

# THE NATIONAL PRIVATE HIRE ASSOCIATION



10 May 2012

To: Julian Alison  
Licensing Team Leader  
Oxford City Council  
St Aldate's Chambers, 109 St Aldate's  
Oxford OX1 1DS

REF: Vehicle age restriction and emissions policy

Dear Julian

Further to our conversation, the National Association wanted to put down in writing a couple of comments with reference the above subject matter, for possible consideration during the next General Purposes Licensing Committee on 28 May.

We preface our more specific comments by mentioning – of which we are sure you are aware – the total review of taxi and private hire legislation being undertaken by the Law Commission, and advising any and all local authorities that are conducting their own local reviews to bear in mind the impact of the Law Commission's timetable of action upon local authority licensing powers.

With a view to issuing fresh legislation during the current session of Parliament, the Law Commission has now issued quite a sizeable consultation document (241 pages) for consideration by and input from licence holders, local authority officers and the general public, during a statutory 12-week consultation period. Following on from this, the Law Commission project team is intending to collate suggestions and proposals into a draft Bill to be considered by Parliament some time during 2013, which final Bill would receive Royal assent hopefully in 2014.

Alongside the large consultation document, which can be downloaded from their website [www.lawcom.gov.uk](http://www.lawcom.gov.uk), the Law Commission project team has also provided a 16-page summary document highlighting the major proposals and questions for consideration. We attach a copy of that document for the benefit of yourself and your Committee.

You have kindly sent us the existing vehicle age restrictions and emissions guidelines as ratified by Oxford City Council in 2009, along with proposals to extend further into the future such conditions. As you explained the council's rationale, Oxford is in a Low Emission Zone and striving for a 'Cleaner, Greener Oxford'; therefore your council is adamant that licensed hackney carriages and private hire vehicles adhere to strict emissions bands. You have also informed us that Councillors have stated that, as Oxford taxi and private hire vehicles share the bus lanes, they should also adhere to the same emission requirements.

We would wish to raise several points here:-

1. What are the current emission standards for Oxford buses?
2. Does such bus emission policy restrict the age of buses to the extent that it does for taxis/PHV – ie. not licenseable after three years old. We would doubt that would be the case, and would submit that to rule out licensing taxis/PHVs over three years old is extremely punitive, especially in these recessionary financial times.

3. As you have highlighted yourself, bus companies have far more financial resources behind them to adhere to such emission requirements than do individual hackney carriage or private hire businesses.
4. Is there mention or consideration of taxis and PHVs in Oxford's Local Transport Plan? We ask this because in the majority of council LTPs, little or no mention is ever made of our trade in any context – least of all within eco-considerations.

We would respectfully suggest that, rather than adhering to such strict vehicle age restrictions as set out in 2009, a more relaxed approach is used in relation to the age of the vehicle at first licence application. In our experience, a brand-new taxi or PHV can still fail its compliance test if the proprietor is less than vigilant in their approach to vehicle maintenance. This, we are sure, is why the Department for Transport comes down against vehicle age policies/conditions in their Best Practice guidance.

We have also found that a degree of vicarious liability on the part of private hire operators should be observed, and that a three-strikes-and-out approach can indeed have the desired effect: that is to say, if a particular operator has a vehicle, or several vehicles, on his/her fleet that continually fail the compliance test(s) or roadside swoops, then that operator is brought in front of Committee with a view to revoking his operator's licence, in a test of 'fit and proper' for allowing substandard vehicles to represent his company and endanger the public.

These are all perfectly legitimate restrictive practices that have proven to rid a good many licensing districts of "old bangers" kept on the road by less than scrupulous proprietors who only use the compliance test to find out what needs fixing on the vehicle 'this time'.

We do not have a major problem with setting a maximum age restriction if your council insists on having one; however, the current proposal to not renew the licence of any vehicle that has reached five years of age (that you wish to put into effect from 01.01.2014) would risk severe financial hardship on individual owner/drivers who will not have the means to change vehicles as frequently, and may be forced to become unemployed – or surrender their licence with Oxford and obtain a licence from a less restrictive authority.

You may feel that, having already agreed not to relicence any vehicle built before 01.10.2006 with effect from 01.01.2013 that you have set an eight-year upper age limit (ie. no vehicle will be relicensed should it be eight years old at the time of licence renewal), which is considerably more reasonable from the standpoint of the trade's financial position.

As such, and with consideration of the other points highlighted in this correspondence – which I hasten to add is not simply for the benefit of the trade, but also in keeping with the spirit of working partnership we have developed with your licensing authority – what we would really favour is a more flexible approach to the issue of new vehicle licences by retaining the current five-year entry age limit, and allowing an upper age limit of eight years old for the renewal of licences. This carries forward with clarity what was put into effect on 15<sup>th</sup> June 2009, it meets with the Cleaner Greener Oxford objective, but at the same time shows consideration to the trade in what is a very precarious financial climate.

This formula would also be more likely to safeguard the licensing authority from potential legal challenges, and may well mould more easily with any potential changes introduced in 2013/4 by the Law Commission.

We are also mindful of the fact that to examine and expand the emissions requirements usually gets rid of a lot of older vehicles in any event, without having to have such a stringent entry age restriction. You may be aware that Cambridge City Council is also reviewing its emissions policy/conditions at present, and we are working closely with the hackney carriage association in that district to reach agreement on

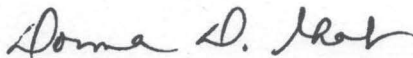
this issue. As our contact on their Committee pointed out, most of their members run quite new and high-standard vehicles, so they would meet reasonable Euro levels in any event.

In summary, we note that the Committee wishes to "look further into the future" in formulating the full set of conditions in Oxford. Once again we would refer you to the Law Commission consultation, and ask your Committee how these proposals will affect local authority licensing powers.

We say this on the basis of saving council time, effort and resources by waiting until at least after the public consultation before moving forward with any existing or new proposals on policy/conditions.

I hope this assists.

Yours sincerely  
For **THE NATIONAL PRIVATE HIRE ASSOCIATION**



**(Mrs) DONNA D SHORT**  
**Director/Company Secretary**

COLTA Petition against proposed Oxford City Council Euro Emission and Age limits for Hackney Carriage Vehicles, as stipulated on the Taxi Licensing news letter May/June 2012

Name/Driver/Proprietor	Badge Number	Address
M. A. CHAUDHRY	HP 0085	
Sajid H. Malik	HPD 122	
GHC	HP 18	
M. NAJAL	HPD 067	
M. Nadeem	HPD 79	
Fazal	HPD 21	
B. AHMED	HPD 0090	
A. BUTT	H.P.D 0379	
A REHMAN	HPD 0161	
MUHAMMAD SUNABALI	HP.D.0021	
MUNAWAR HUSSAIN	HPD 0282	
GHAZANFAR ALI	HPD 010	
ZESHAN AHMED	HPD 365	
HUMAYUN REHMAN	HPD 174	
MOHAMMED TASSIB	HPD 202	
SHAHID SARWAR	HPD 201	
Z-A-DOSAR	HP 245	
GHAZANFAR ALI	HPD 192	
Jehangir-ul-HASSAN	HPD 239	
NISAR HUSSAIN	HPD 275	
M. ZAHOR	HP 345	
MR. A. S. DUGAR	HPH 305	
Mohammad Yousaf Bajwa	HPD 014	
SHANQUL AHMED	HPD 182	
ASAD MEHTA	HC 92	
MOHAMMAD YASIN	HC 62	
A. Husain	HC 330	
SRANA	HC 335	
M. GULZAR	HC 118	
OMER	HC 64	
SHAHED	HC 374	
AMER BUI	HC 45	
GULZAR	HIC 070	
MO. KHAN	HPD 0069	
ABTIA HUSSAIN	HPD 288	
TARIQ MIRZA	HPD 280	
USMAN AHMED	HPD 279	
MASOOD AHMED	HPD 259	
NISAR DOGAR	HPD 293	
AMMAR MUSTAFA	244	
MOHSIN BUTI	HPD 238	
ANWAR UL HAQ	HPD 268	
SHEERAZ IQBAL	HPD 0384	
Shakil Nasir	HPD 200	
FATISAL H ICHAN	HPD 0063	
SHAH JAVED KISAN	HIC 143	
ATLAMI S. DOGAR	HIC 308	
A. Saadullah	HIC 28	
ABOUL-GHAFOOR	H.C 0336	





X 80

Oxford City Council  
Taxi Licensing  
Julian Alison –Licensing Team Leader

Date: 12-5-2012

Dear Mr Alison,

**Re: Current Criteria for vehicle age limits**

I write with reference to the latest May /June 2012 newsletter and specifically with the proposal to change the maximum and minimum age of taxi vehicles.

I am deeply concerned at your proposals which are unrealistic, unreasonable and out of touch with the pervading economic climate!

You will contribute to furthering unemployment in Oxford and add to hardship to families already hit by recession if you persist with your proposals. In simple terms drivers will simply not be able to purchase new vehicles every 5 years which will result in hardship for families and also loss of income for the council.

I don't think you have considered the reality of the financial situation experienced by the taxi drivers in Oxford. Any survey will show you that business is in decline and drivers are struggling to keep their heads above water.

I don't think you have taken into account the spiralling cost of fuel, insurance, road tax, council plate, badge, 2 compliance tests and regular ongoing maintenance costs. To compound matters, there has been no tariff increase for 2 years and yet the costs that you impose increase year on year.

As a taxi driver purchasing a vehicle that costs between £15000 & £20000 (private hire) and £35000+ (black Cab) is real money and a burden. How on earth do you think that I would even consider to buy a new vehicle and along side with all the financial burdens mentioned above is beyond me.

I request that you reconsider your proposals on the basis that Euro emissions compliance is applied to new vehicles being registered and any existing registered vehicle that continues to pass the compliance test must legally be deemed fit for taxi purposes.

I urge you to work with the drivers as you regularly claim to do and re-consider your proposals.

Yours sincerely

Name: GUL MOHAMMED.  
Badge No: HPD 0057

Licensing Authority  
Oxford City Council  
Received

X 41

ABC/RADIO TAXIS OXFORD

[REDACTED]

**OBJECTION TO THE PROPOSED AGE LIMIT OF UP TO A MAXIMUM 3 YEARS OLD WHEN PUTTING A NEW CAR ON, AND HAVING TO TAKE THE CAR OFF WHEN IT'S 5 YEARS OLD**

I the undersigned object strongly to the above, as the implementation of this proposal would make it impossible financially to continue as Private Hire Driver.

It is impossible to buy a 2/3 year old car and then replace it at 5 years old, with another 2/3 years old car and make a living.

This proposal should be dropped as the present regulations are adequate.

Signed... [Signature] .....

PHV... 726 .....



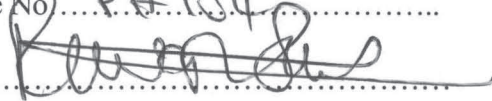
x 43

01 May, 2012

To Whom It May Concern:

In reference to the recent newsletter May 2012 we at Royal Cars Reject the motion to go forward with the new rule of having vehicles older than 5 years taken off the road. A lot of drivers make heavy investment in new vehicles with the intention making a return on the cars, having to renew your vehicle every 5 years is not financially justifiable.

As drivers we need more time on vehicles to make a return, the industry is not profitable for us to be buying new vehicles every 5 years.

Name Rizwan Sultan  
Badge No. PH 134  
Sign. 

Date.....

x 4

The Chief Officer  
Taxi Licensing  
City Council  
Oxford

15 May 2012

RE: Your proposal to change the maximum and minimum age of our vehicles.

Dear Sir,

Your current proposal not only impacts every Private Hire and Hackney driver but also the operators and ultimately your office. Drivers will simply not be in a financial position to purchase new vehicles every 5 years, resulting in a loss of income for your office.

With all due respect, you and your advisors are ill-informed. It is becoming increasingly harder to make a living in our trade with the ever spiralling cost of fuel, insurance, road tax, council plate and badge, as well as 2 compliance tests and a host of other expenses. We have been denied a tariff increase for the past 2 years, unlike other public transport services, yet we must absorb the costs you impose and increase year on year!

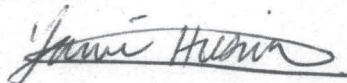
You mention Euro Emissions Compliance; surely this should only affect new vehicles being registered with your office? Any vehicle that is currently registered and continues to pass the compliance test must be legally deemed fit for purpose.

Purchasing a new Hackney Carriage at a cost of £35,000 + interest approximately totals £45,000. Taking into account a monthly payment of £750, maintenance, running costs, insurance and, above all, our own living expenses, purchase of a new vehicle would make it impossible to make ends meet! With this kind of outlay I would expect to be using my vehicle for a far longer period of time than that which you are proposing. It would take the average driver substantially more than 5 years to recuperate the initial cost of the vehicle.

In London itself there are presently Hackney Carriages well over 20 years old still in operation. Therefore I fail to understand why there should be a problem in Oxford, despite there being so much intense regulation.

I strongly urge you to reconsider your proposal as many livelihoods are at risk.

Sincerely



Badge number: HPD 0608

Licensing Authority  
Oxford City Council

Received

X 13

Oxford City Council, Taxi Licensing Office

Dear Julian Alison,

I am writing in response to Oxford City Council's consultation regarding the restrictions on usage of older vehicles for hackney and private hire purposes.

I am very concerned that these 'age limits' being placed on vehicles are particularly onerous and some of my concerns are thus:

1. There is no need for an age limit specific to Taxis, as there is a retrofit system, which enables taxis to comply with Euro 4 emissions standard. The system is manufactured by HJS Emissions Technology, which has been approved by the UK Vehicle Certification Agency, creating a more cost-effective solution to dealing with emissions problems.
2. Vehicles should be tested upon their engine size and other factors, rather than the actual registered age, as each taxi should be licensed on its own individual's merits.
3. The imposition of age limitations as a condition for licensing is an unnecessary burden, it is estimated on average to cost in addition to other costs somewhere in excess of £10,000 each 5 years and that is not sustainable by many, in the current financial climate.


I feel very strongly that these measures being imposed will have a severe detrimental effect on the taxi drivers who strive to provide an effective service to those working, living and visiting Oxfordshire.

As a taxi driver, I provide an exemplary service working in partnership with the Council often under difficult circumstances and thus these measures would be particularly punitive affecting my ability as a self-employed individual. In context with the current financial conditions, these measures being introduced seem particularly harsh, as they will directly impact on those providing this service. I am sure the council is aware that the majority of those working within this service are from the minority communities and there is a legislative framework in place for this.

I sincerely hope that the Council takes my concerns seriously and I look forward to an amicable resolution.

Yours sincerely,

Badge No: PAD 132

  
M. XAQOOB

Licensing Authority  
Oxford City Council  
21 MAY 2012  
Received

x 66

Name : MEHRAN @JANG

Badge no. PHD 0752

Date : 08/05/2012

Dear Julian

I am writing to raise my concerns about the consultation in relation to changes to the age limits to private hire vehicles by the Oxford City Council.

I feel strongly that such a step is going to have a huge impact on the private hire driver's trade and on top of the already tough financial landscape this is something that is not affordable for many of the drivers in Oxford.

The imposition of age limitations as a condition for licensing is an unnecessary burden being brought onto the private hire trade and this will have a huge impact on our financial viability. I hope the council will reconsider their policy in order to consider the lively hoods of the private hire trade in Oxford.

Yours sincerely,



**ALISON Julian**

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**From:** [REDACTED]

**Posted At:** 26 April 2012 21:49

**Conversation:** Vehicle age limits

**Posted To:** VEHICLE AGE LIMITS

**Subject:** Vehicle age limits

**Dear sir or madam**

**I have read your news letter regarding vehicle age limits i just would like to point out few imported points firstly how can the council expect the taxi drivers to exchange their vehicles every four years when it is already difficult to make money. People don't earn enough to feed their families. As before the council has already made the law of not having vehicle that are ten years old on the road which is fair enough because it is the safety of the public.**

**thank for time**

[REDACTED]

**ALISON Julian**

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**From:** [REDACTED]  
**Posted At:** 29 April 2012 15:54  
**Conversation:** Consultation Response: Vehicle Age Proposals  
**Posted To:** VEHICLE AGE LIMITS  
**Subject:** Consultation Response: Vehicle Age Proposals  
To Licensing Team Leader,

This E-mail is in regards to the proposal put forward, by the council, concerning the new age limits for Hackney Carriage vehicles.

I think the existing system is fine and needs no alteration; a system where if a cab passes its MOT it is fine for trade. But this new system of changing cabs every 5 years is extremely unacceptable; firstly because of the costs involved in purchasing a purpose built vehicle can exceed £35,000, this is just the purchase price, the total price can run up to £45,000 once all the interest of loans are paid.

Secondly changing cabs every 5 years is unfair considering that we drivers are facing ever increasing prices for fuel, MOT (twice a year- £500 plus any other work required- alternator, battery, starter motor and water pump- we change these items at least once a year at a cost of over £1000) insurance (£1700 for the year), tax, tyres (each tyre costs over £100) and other taxes imposed on us by you; i.e. the tax for trading in the Train station (which is £630 a year) and the price for renewing my license (£400 a year). Even if we buy a brand new cab every five years we would still incur these costs!

Also my current vehicle has been in trade in Oxford for the last six years; each year it has passed its stringent MOT that is required thus why would I need to change cabs? I have just spent over a £1000 getting my taxi resprayed and I have always spent money on keeping my cab in an excellent condition. If these proposals are put in place then why I and any other driver, bother with keeping our cabs in good condition if we have to sell them every 5 years? Surely this will lead to unkempt, unclean and mechanically poor cabs; which will discourage and soil the name of our city in front of tourists. Cities like London, Birmingham, Manchester and Edinburgh are still full of old cabs if they don't see a problem with these twenty year old plus cabs then why does our council see a problem with cabs that are only 6 years old?

I hope that you will re-consider these proposals because they will only increase the burden put upon us. I look forward to receiving your response.

Regards

[REDACTED]

**ALISON Julian**

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**From:** [REDACTED]  
**Posted At:** 01 May 2012 20:13  
**Conversation:** Taxi licensing Newsletter  
**Posted To:** VEHICLE AGE LIMITS  
**Subject:** Taxi licensing Newsletter

Hi there,

Regarding to the current criteria for vehicle age limits this article should be longer than what is mentioned in the newsletter because a lot of taxi drivers like myself can not afford to buy another vehicle so soon because of recession and i have bought my vehicle two years ago for £8000 so it cost me a lot to have it on the road. Also i have spoken to the license office when i was buying this vehicle two years ago and they told me my car will be allowed on the road for the next five years or more. According to this letter e euro 4 immision my vehicle is reg 55 which is 2005 december i am not happy with this because it states vehicles like mine will be off the road. Please could you look into this matter and get back to me.

Thanks

[REDACTED]  
[REDACTED]

Sent from my iPhone

**ALISON Julian**

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**From:** [REDACTED]  
**Sent:** 30 April 2012 18:36  
**To:** ALISON Julian  
**Subject:** Re: MINUTES FROM TAXI TRADE MEETING 17.04.12

Dear Julian

I would like to express my concern at the recent proposal to exclude vehicles of more than 5 years of age from private hire licence renewal. The simplest way for me to do this is to quote you some approximate earnings figures.

Over the last 3 years I have averaged earnings of between 22k and 25k before tax. During this period I have relied on quality used cars that cost in the region of 8k-9k. If the new guidelines are introduced, I will be expected to provide a new vehicle costing approximately 30k-35k, to run for 5 years or a used vehicle costing approximately 15k-18k to run for 2-3 years. It is apparent that I am going to struggle to make the figures tally. I can't imagine, in these times of cuts, ever-increasing fuel prices and austerity measures, that I am going to be the only private hire driver who finds himself in this position.

May I suggest increasing the vehicle age limit to 7 years, a not unrealistic figure in my opinion, but of course carry on with the proviso that no vehicle be licenced initially, if it is more than 3 years old. This will enable me to run my car for 4-5 years with an investment of 15k-18k, figures that will certainly make it far easier for me to continue trading.

Yours sincerely

[REDACTED]

(Licenced operator carrying out chauffeur work with an exempt vehicle)

On Sat, Apr 21, 2012 at 3:57 PM, ALISON Julian <[JALISON@oxford.gov.uk](mailto:JALISON@oxford.gov.uk)> wrote:  
Dear All,

Please find attached the minutes from our last Trade Meeting.

In addition to the Trade Minutes, the success of the Taxi Marshalling Scheme has led to it being a permanent fixture in the City every weekend.

**Kindest regards**

**Julian Alison**

**Licensing Team Leader  
Oxford City Council  
St. Aldate's Chambers  
109 St. Aldate's  
Oxford  
Oxfordshire**



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**(Office: Monday - Wednesday)**

**(Mobile Working: Thursday - Friday)**

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To

Oxford City Council,  
Taxi Lic. Dept. Oxford.

Dear Sir/Madam,

I am writing in response to your letter  
May/June 2012 regarding "Age of the vehicle"

I believe that you are fully aware of  
'Economic situation' in Britain. Country is in  
double dip recession. 'The Taxi Business' is the most  
affected in this situation. Mind you the Oxford city  
boundary is maximum of 4 miles from the Oxford  
train Station towards East, West is less than one and  
half mile North is 3 miles. There's hardly a job that  
is worth £10.

In this situation putting a 'age limit'  
on Taxis is ridiculous. New Taxi costs about £45000 - just  
to buy it, at the top maintenance cost, Insurance  
cost, City Council Lic. fees and badge fees costs  
enormous amount of money.

Briefly, I can explain the cost per day will be as follows

£45000 For 5 years Plan - i.e. £9000 a year -  
it makes £24.65 per day Plus maintenance, Insurance  
other expenses will be about £15 a day.

It makes £40 a day cost just to run it.

Fuel cost at the moment is £1.47 a litre  
I need £65 average a day before I make any profit  
for my self.

Do you really believe in a 4 miles  
boundary city it will be possible for me to afford  
this 'white elephant'

P.T.O

once it comes to fair rise, the formula of 4 miles come into force. I am always told the inflation rate on 4 miles, which is about 3% on average.

Last 3 years I had pay rise of 0.15 P on a journey. while the cost of fuel is doubled, Council put the licence fee up, badge from £99 to £123.

Insurance £800 to £1400 Taxi Tyre from £55 to £99. Nothing above mentioned are gone up with inflation rate.

At the same time we have 6 months MOT. System. If the Taxes are not road worthy MOTs are not issued.

In London the old Ex's are still running without any hitch.

Why Oxford City Council is putting this extra burden on us is un-understandable.

In this city Buses are running with public money. Most of their routes are subsidised, still

twice a year their fares are gone up, why they are paid subsidies while we are not getting any thing but the 'Hassle and Pain' by legislators.

I hope the council will think twice before they put 'Last nail on the Coffin'.

Thanks.

**ALISON Julian**

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**From:** CRAMER Jill  
**Sent:** 02 May 2012 10:55  
**To:** ALISON Julian  
**Subject:** FW: re newsletter

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**From:** [REDACTED]  
**Posted At:** 02 May 2012 10:05  
**Posted To:** licensing@oxford.gov.uk  
**Conversation:** re newsletter  
**Subject:** re newsletter

In response to your friendly may/June newsletter :

1) 100% against CCTV ( HOWEVER YOU TRY TO NAME IT ie black box.... chocolate frog etc , **don't change the words for legal compliance** ) the only solution to this make this OPTIONAL for the vehicle owner , we are still contacting local and uk M.P's for support including P.M DAVID CAMERON MP WITNEY ,NICOLA BLACKWOOD MP ABINGDON, ANDREW SMITH MP OXFORD, and we have capacity to take this to European court can we have a copy of the GENERAL PURPOSES LICENSING COMMITTEE LETTER PLEASE ?

THE VERY STRONG FEELINGS WE HAVE REGARDING THE C.C.T.V CAMERA ARE : PRIVACY ( OUR CLIENTS AND OURS INC OUR FAMILIES ) does nothing for safety !!!

PUBLIC FUNDS ) COSTS ( OURS AND

2) YOU HAVE NOT POINTED OUT THE EMISSION STANDARD CO2 LIMITS IN VEHICLES ( EURO 4/5/6 ) WHAT IS THE TECHNICAL LIMIT OF THESE EURO STANDARDS IN KG/CO2

AND I TAKE IT THESE WILL APPLY TO HACKNEY LICENSE VEHICLES ALSO ( I WOULD HATE TO THINK THAT YOU ARE DISCRIMINATING AGAINST PHV ONLY ) I TAKE IT THESE EMISSIONS AND AGE OF VEHICLE WILL APPLY TO ALL PUBLIC TRANSPORT IN OXFORD INC BUSES ,TOUR BUSES , COACHES ETC... ( WE WILL BE SEEKING LEGAL ADVICE ON THIS AS THE DISCRIMINATION LOOKS LIKE ITS MORE THAN JUST VEHICLE DISCRIMINATION ..... ! )

3) **WE ARE NOT REPRESENTED BY COLTA OR PRIVATE HIRE OPERATORS ASSOCIATIONS ( WE ARE SELF EMPLOYED DRIVERS ) SO PLEASE STOP ASKING THEM AND CONSULT THE DRIVERS BY POST/PHONE EMAIL ( YOU HAVE THE COMPLETE DETAILS OF ALL THE DRIVERS SO THAT SHOULDN'T BE TOO DIFFICULT )**

4) **THESE NEW PROPOSALS REGARDING AGE OF VEHICLE ARE TOTALLY PREPOSTEROUS ( LONDON HAS BLACK CABS THAT ARE OVER 30 +YEARS OLD !!! WE ARE TESTED 2 TIMES A YEAR AND OUR VEHICLES ARE KEPT IN A SAFE**

**AND ROADWORTHY CONDITION , I COULD UNDERSTAND IF YOU WERE GOING TO TAKE PRE 2001 VEHICLES OFF THE ROAD AS THERE IS NO DATA REGARDING EMISSIONS PRIOR TO THIS , BUT YOU HAVE ALL THE DATA OF ALL THE VEHICLES AFTER THIS DATE .**

**THESE PROPOSALS BY YOU WILL ACHIEVE NOTHING APART FROM PUTTING MORE PEOPLE ON THE UNEMPLOYMENT LIST**

**We are in a recession and our trade has dried up enough without you thrusting more and more expenses on the drivers who are having a hard enough time trying to support families, try to work with us and not against us .  
we do our best to provide a safe and decent public service  
thank you for your time**

Mr Allison

Re: Proposed changes for age limits for future vehicles

I represent the views of approximately 25 hackney proprietors. We have had the opportunity to study your May/June 12 newsletter. We have a number of concerns with the proposed changes to the age limits for future vehicles, we would be grateful if you could clarify the following points:

- What is the legal basis for the introduction of these Euro emission standards
- COLTA members have not been consulted on these proposals so I am shocked to hear that the COLTA representatives agreed to the proposals. I recognise that this is not an issue for you per se but I wish to make the point that COLTA members are not being consulted. This matter is being dealt with separately.
- In your newsletter relating to the renewal of existing vehicle licenses from 1<sup>st</sup> of January 2014 can you clarify the intent of the requirement. You state that no vehicle shall be licensed if it is 5 years old from the date of first registration. However in the second part of that sentence you state that if it is 5 years of age or older when it come to renew the licence you will be able to renew it. This is confusing since the first part of the sentence states a specific requirement whereas the second part contradicts the earlier part. Can you clarify this.
- The proposed standards to be achieved for renewal of existing vehicle licenses from 1<sup>st</sup> of January 2016 onwards relates to meeting Euro 5 Emissions and likewise from 1<sup>st</sup> of January 2021 onwards relates to meeting Euro 6 Emissions. As long as these standards are met the age of the vehicle is immaterial. Can you confirm that this is the intent.
- Having consulted with approximately 25 Hackney proprietors who have clearly expressed dismay with the proposals in your newsletter. The overwhelming view of essentially requiring the purchasing cabs that are not older than 5 years old is that this is not economically viable and is a financial disaster. This will introduce an extra £7000 - £9000 increase in costs per annum which for many is completely out of the question. What impact analysis has been undertaken of introducing this additional burden on small businesses at the time of a double dip recession. This is completely contradictory of the government's approach of assisting small businesses.

I would be grateful if you could clarify the points raised above by the 4<sup>th</sup> of May 2012 so that we may meaningfully contribute to the consultation process. We recognise the importance of improving standards in the taxi trade however this has to be economically viable and sustainable. We wish to be involved in any discussions, negotiations that may affect the outcome of our livelihoods. I wish to be invited to any future meetings on these issues.

Yours sincerely



**ALISON Julian**

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**From:** [REDACTED]  
**Sent:** 07 May 2012 18:42  
**To:** ALISON Julian  
**Subject:** consultation news letter/private hire

Dear Julian,

I hope you are well.

I am writing to raise my concerns in response to the plans highlighted in the consultation document to introduce changes to the vehicle age limit in Oxford for private hire vehicles.

There are many reasons why this is a wrong step at the wrong time and the main one would have to be the fact that in such difficult financial times the council is applying a huge increase in cost burden to the drivers, whereby the minimum costs for a newer car is anything over and above £10,000 for each driver on top of all the other expenses. For most of them these kind of sums are simply unaffordable and it would be wrong of the council to impose such huge financial penalties at a period where many drivers are already stretched to their maximum and need help not further financial penalties.

I have already raised these issues with you at the trade meetings but I strongly feel that I have to reinforce my opposition to this policy as it is unfair and unworkable for many. The council needs to look at alternative options and I would also strongly recommend doing a more comprehensive consultation on this policy including taking into consideration the impact of this policy on the cities private hire driver network.

I look forward to hearing from you with your response.

Regards  
[REDACTED]



**ALISON Julian**

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**From:** [REDACTED]  
**Posted At:** 26 April 2012 22:13  
**Conversation:** VEHICLE EXCHANGE  
**Posted To:** VEHICLE AGE LIMITS  
**Subject:** VEHICLE EXCHANGE

**Dear sir or madam**

**I have just read you up to date news letter about changing private hire vehicle every 4 years how can you expect this to happen every four year's when driver like us don't make enough money. In point of view if you look on the other when the black cab are still running their old vehicle's that are more than 10 year's old, are the council making it fair in my point of view its not fair because black cab are making more money than private hire. At weekend's we are sitting waiting for jobs awhile the others are making money. At least let the private hire pick up from anywhere on saturday night. If you think about it how can private hire exchange their vehicles?. I hope you will give me an answer**

**ALISON Julian**

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**From:** THOMPSON Emma  
**Sent:** 02 May 2012 12:40  
**To:** ALISON Julian  
**Cc:** CRAMER Jill  
**Subject:** FW: Taxi age restriction

-----Original Message-----

**From:** [REDACTED] **Posted At:** 02 May 2012 12:13 **Posted To:** licensing@oxford.gov.uk  
**Conversation:** Taxi age restriction  
**Subject:** Taxi age restriction

Hi there

Writing you a Emile regarding the letter I received about 5 year age restriction in Oxford its very easy to come out with idea like this if you are siting in office not living in real world WHY Oxford not any where else in England prime example is city of London where you can still see old fairway on the roads These black cab are very expensive to run they are not like normal cars we don't have a local service dealer each time we have to go London are birmingham to get a service which is all ready way to expensive running cost of for new vehicle idea even is going to be more harder then you going to live rest off life in debt?

As long your vehicle compliance with MOT by law should be ok to stay on the road don't you think so?

Sent from my iPhone

Thank you  
[REDACTED]

**ALISON Julian**

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**Subject:** FW: Consultation proposals for future vehicle age limits

-----Original Message-----

From: [REDACTED] Posted At: Sat 28/04/2012 11:16

To: licensing@oxford.gov.uk

Posted To: licensing@oxford.gov.uk

Conversation: Consultation proposals for future vehicle age limits

Subject: Consultation proposals for future vehicle age limits

Hi my name is mr [REDACTED] and I'm a hackney carriage driver [REDACTED]

I received the newsletter from yourselves regarding the vehicle age limits and I wasn't happy with the proposed plan, financially this does not benefit me at all as it will introduce extra debt and loans into my life.

It's hard enough having a mortgage and a family to look after, then having to worry about an additional unnecessary £30,000 every 5 years.

I believe I'm speaking for 95% of the hackney drivers.

Thank you

Sent from my iPhone

**ALISON Julian**

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**From:** THOMPSON Emma  
**Sent:** 08 May 2012 13:17  
**To:** ALISON Julian  
**Subject:** FW: TAXI AGE LIMIT CHANGE PROPOSALS

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**From:** [REDACTED]  
**Posted At:** 08 May 2012 13:12  
**Posted To:** licensing@oxford.gov.uk  
**Conversation:** TAXI AGE LIMIT CHANGE PROPOSALS  
**Subject:** TAXI AGE LIMIT CHANGE PROPOSALS

TO THE TAXI LICENSING DEPT

I would like to register my strongest objections to the proposal to change the current regulations, and implement an upper age limit when putting a **new car on of, up to 3 years old**

and being made to **take the car off when its 5 years old.**

At the moment I can buy a 2007 Ford Mondeo for approximately **£3000**, license it and work it for 4 years and then sell it to a starter driver for about **£500**.

Under your proposals I would have to buy a 2009 Ford Mondeo for approximately **£10,000**, and then have to replace it 2 years later when its 5 years old, with no chance of selling it, as its outside the age limit.

I then have to replace it with another car costing **£10,000**.

Of the 57 cars working on ABC/RADIO CARS at the present, 50 of them would have to replace their cars, they would also because they are putting a new car on have to pay for the CCTV equipment to be installed at a further cost of £400/500.

Having talked to the 50 drivers concerned 75% have said they couldn't afford to change and would leave the trade, this would mean that ABC/RADIO TAXIS that has been trading in Oxford for over 40 years would be forced to close to avoid bankruptcy.

The present regulations which themselves were reduced recently from 6 years to 5 years when putting a car on are quite adequate, and hold the balance between ensuring the quality of the cars beeing licensed are met, and the ability of ordinary working drivers to afford and make a living.

This proposal will ruin the taxi trade in Oxford and force hundreds into hardship.

Having been in the Taxi trade for over 20 years, and attended the meetings between yourself and the trade, where you state that you want to work with the trade over matters such as these, I urge you consider the points I have made and drop this proposal.

[REDACTED]  
Proprietor  
ABC/RADIO CARS

**ALISON Julian**

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**From:** [REDACTED]  
**Posted At:** 12 May 2012 16:53  
**Conversation:** Age of cabs.  
**Posted To:** VEHICLE AGE LIMITS

**Subject:** Age of cabs.

I write with my deep concern in regards to your proposals to change the maximum and minimum age limit of our taxi vehicles and the euro emission compliance outlined in the taxi licensing newsletter.

Any current registered vehicle which continues to pass the compliance test ( M.O.T ) has been and should be legally deemed fit for purpose. After all the six monthly M.O.T tests carried out by the Oxford City Council engineers / mechanics are very stringent and ensures that the cabs are up to very high standards.

The L.T.I's cabs (London style taxis) are indeed built to last well over fifteen to twenty years and this why they cost lot more money to buy than ordinary cars.

Most if not all of the parts are bolted on and bolted off. Any part that needs replacing once replaced it's like having a new cab, that is the nature of the design. The proof of this is that P reg. and H reg. I believe are still going strong in the city of London.

Vehicles that are good enough to be licensed and plated as taxis in the city of New York and city of London should also be good enough to be licensed and plated as taxis in Oxford but they are NOT.

Under the Oxford's criteria for fitness of vehicle for taxis. To license and plate a vehicle as a taxi the vehicle on top of being wheelchair accessible also has to have a step plus a swivel seat, this is narrowing our choice to only one or perhaps two choice of vehicles.

Maybe we need to renegotiate about going back to saloon type cars as taxis as they were before 1999 and getting rid of this wheelchair, swivel seat and the step type of vehicles.

The taxis are not the only thing we have to run, most if not all of us have families to support and mortgages to pay and there are many other expenses.

At time of recession when the taxi trade is in decline and with ever increase in insurance premiums, fuel prices, road tax, regular repair bills, tyres, council plate fees, badge fees, two M.O.T's, to propose a change of vehicle every five years is unrealistic, unreasonable, unpractical, unaffordable and beyond belief.

It seems to me that the proposals have not been thought through and therefore should be scrapped.

[REDACTED]  
Sent from my iPhone

Name: FIAT ARSLAW

Address:

Badge N

Date: 15.05.2012

Dear Julian,

I am writing to raise my concerns about the current proposal to change the age limits to private hire vehicles by Oxford City Council.

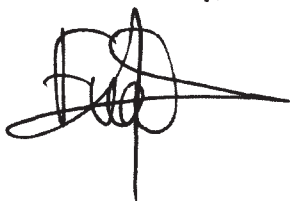
I feel strongly that such a step would have a huge impact on the private hire driver's trade and on top of the already tough financial landscape this proposal is neither affordable nor financially viable for many of the private hire drivers.

The proposal to decrease the age limits for vehicles as a condition for licensing is an unnecessary burden being bought onto the private hire trade and this will have a huge impact on our financial viability.

Also the decision passed by the committee last year to lower the age limit for new registrations from 5 years to 3 years from 2013. This will lower the standard of vehicles that will be registered as new drivers will inevitably purchase cheaper vehicles. so instead of buying a 5 year old Mercedes or Toyota Prius the driver will be forced to purchase a vehicle less suited for the private hire trade.

I hope the council will reconsider its policy and have consideration for the livelihood of the private hire trade in Oxford.

Yours Sincerely,

A handwritten signature in black ink, appearing to be 'Julian', written over a horizontal line.

**ALISON Julian**

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**From:** THOMPSON Emma  
**Sent:** 11 May 2012 08:08  
**To:** ALISON Julian  
**Subject:** FW: Vehicle age

-----Original Message-----

**From:** [REDACTED] **Posted At:** 10 May 2012 19:48 **Posted To:**  
licensing@oxford.gov.uk  
**Conversation:** Vehicle age  
**Subject:** Vehicle age

Hi there my badge number [REDACTED] iam against the proposal of age limit i like the old system

Sent from my iPad

**ALISON Julian**

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**From:** THOMPSON Emma  
**Sent:** 08 May 2012 08:15  
**To:** ALISON Julian  
**Subject:** FW: Vehicle Age Limits

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**From:** [REDACTED]  
**Posted At:** 07 May 2012 14:42  
**Posted To:** licensing@oxford.gov.uk  
**Conversation:** Vehicle Age Limits  
**Subject:** Vehicle Age Limits

Dear Mr Alison,

In response to your proposal to change the minimum and maximum age of our vehicles

If you persist with these proposals all you are going to achieve is increasing the length of the unemployment line in George St.

Your current proposal not only impacts every private hire and hackney driver but also the operators and ultimately your office, drivers simply will not be able to purchase new vehicles every 5 years which will result in a loss of income for your office.

It is becoming harder and harder to make a living in our trade with the ever spiralling cost of fuel , insurance ,road tax, council plate and badge as well 2 compliance tests plus a host of other expenses.  
We have not had a tariff increase for 2 years yet the costs that you impose increase year on year!!.

You mention the euro emissions compliance this should only affect new vehicles being registered with your office.  
As any vehicle that is currently registered will be compliant with the emissions regulations that were in force at the time of their manufacture.  
And so long as they continues to pass the compliance test must legally be deemed fit for purpose.

As a driver purchasing a vehicle with a cost of between£15000 and £20000 (private hire) £35000+ (Black Cab), being properly maintained I would expect to be using that vehicle for longer than the 5 years that you are proposing.  
Taking into account the expenses I have mentioned along with general living expenses alone it would take the average driver over 5 years to get back the initial cost of the vehicle.

You mention in the news letter that these new age limits had been proposed/agreed with colta and the private hire operators ?

I have since been told that the colta representative actually works for the council , (conflict of interest if this is true) and that the only operators that were present at the trade meeting were

[REDACTED] of 001 and [REDACTED] of royals neither of whom have agreed with the proposal.

So I urge you to rethink your proposals.

Sincerely

[REDACTED]



**ALISON Julian**

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**From:** THOMPSON Emma  
**Sent:** 18 May 2012 08:18  
**To:** ALISON Julian  
**Subject:** FW: vehicle age limits

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**From:** [REDACTED]  
**Posted At:** 17 May 2012 22:41  
**Posted To:** [licensing@oxford.gov.uk](mailto:licensing@oxford.gov.uk)  
**Conversation:** vehicle age limits  
**Subject:** vehicle age limits

Dear Sir

Regarding the may/june 2012 newsletter: the age limits on vehicles

As a hackney carriage proprietor it is not financially viable to buy a new vehicle every five years. If you buy a new vehicle(Tx4 )which approximately costs £35000 on finance, by the time you have payed the vehicle off over a five year period, it will cost an extra £8000 plus you will have your day to day maintenance, running costs, insurance, extra.

In Oxford, we have two compliance tests per year, which shows the vehicle at a high standard. Surely if the vehicle goes through this procedure, then the vehicle in question is of a high standard.

My proposal is that I suggest the age limit becomes 'ten years'. Another question which has arisen, why aren't we allowed to license any another vehicle other than Tx4(black cab) eg 'mercedes vito'. The council states you cannot license this vehicle because it doesn't have a swivel seat. I spoke to Mercedes dealership and they told me that no other council in England asks for a swivel seat. There answer to this was that they have an automatic step to assist elderly passengers if need be.

It is my understanding that from 1st January 2013 all renewal of existing vehicle licenses will have to be Euro4 compliance. My renewal of my existing vehicle license expires in August 2012. My question is will I continue to have my current license until August 2013 and when renewed it will be Euro4 compliant ?

The government policy states to help small businesses but your proposals does not for example bus companies have been given public subsidy, we are providing a public service so why aren't we entitled to subsidy from the government ?

The cost of living is increasing day by day whereas my work is decreasing.

If I have to change the vehicle every five years to meet current legislation, therefore I will be working for the finance companies.

I hope you are understand this is a very stressful time for me and my family.

I look forward to recieving your comments in this pressing matter.

Many Thanks.

[REDACTED]

**ALISON Julian**

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**From:** THOMPSON Emma  
**Sent:** 08 May 2012 14:06  
**To:** ALISON Julian  
**Subject:** FW: Consultation Response: Vehicle Age proposals

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**From:** [REDACTED]  
**Posted At:** 08 May 2012 13:58  
**Posted To:** licensing@oxford.gov.uk  
**Conversation:** Consultation Response: Vehicle Age proposals  
**Subject:** Consultation Response: Vehicle Age proposals

Dear Sir/Madam,

Re: Vehicle Age limit (Taxi)

I wanted to say, I feel strongly about the new age limit proposals. I think its rather unfair to set an age limit on vehicles of five years old in Oxfordshire, this does not seem to be the case in other cities. It is very expensive to change a vehicle every five years, especially a Hackney Cab, we would be paying vehicle loans forever, it takes five years to complete a loan and this will become a never ending story. Why the rule only for Oxfordshire? Will we be given grants towards the cost of the vehicles?

Many Thanks

[REDACTED]

**ALISON Julian**

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**From:** [REDACTED]

**Posted At:** 02 May 2012 01:11

**Conversation:** I am against the Vehicle licenses changes

**Posted To:** VEHICLE AGE LIMITS

**Subject:** I am against the Vehicle licenses changes

I am responding to the newsletter regarding the changes to vehicle licensing and I am strictly against it. I am not happy with the new proposals as it is impossible for myself and other drivers to afford new vehicles every year because when you changed the rules last time it was hard for us and the present rule is just on the limits to affordability and it should stay as it is because we have our taxi not done twice a year and the vehicles are inspected with great care and attention. The fact that we are taking out large loans to buy these cars and have still not paid for them and being told by the licensing that no more changes would be made now only two years later the rules are being reviewed again. These changes would make it impossible for us to drive taxis and go on unemployment benefits and claim housing benefits and in this time of reseton with fuel prices going up insurances going up and the cost of wear and tear on the car and living expences going up the last thing we need is changing cars every two years. The low emission should therefore not be a factor for us to keep on changing vehicles as it is unaffordable to do this. The buses in oxford are still (R reg 1997) and are on the road as with our taxis we had to change them 3 years ago so why the differnent rules and in London they have 15 years old taxis and buses buses. Why do we have to follow the

**ALISON Julian**

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**From:** [REDACTED]

**Posted At:** 15 May 2012 16:35

**Posted To:** VEHICLE AGE LIMITS

Dear licensing officer

Thank you for informing me on your vehicle proposal. However, I totally disagree with it for a number of reasons. Firstly, the current taxis are reliable and last longer than some of the newer taxis. Another reason being the cost of buying a new vehicle every 5 years is going to leave us in more debt. As our income is not high enough to be able to afford a new vehicle without having to get a loan to cover the costs. Also the majority of taxis in oxford are TX1 or TX4 which are newer than the FX fairway taxis which are still being used throughout the country and are much older than the taxis we are using in oxford. Thank you for your time.

Your sincerely [REDACTED] [REDACTED]