

29<sup>th</sup> November 2023

Dear Anna Dumitru (Licensing Team Leader)

On behalf of Oxford's Hackney carriage (black cab) trade, I write to you formally urging you to delay the Emission Standards policy and the requirement to change to zero emissions capable taxis to 2028.

It is absolutely vital that you have a clear understanding of the background of the difficulties that the trade has experienced since early 2020 such as medical emergencies, financial crises, industrial action and disruptions to the rail network. It is for these reasons which I will explain in more detail is why we are urging you to delay this policy for a further three years from 2025.

### **Impact of Covid-19**

Oxford's Hackney Carriage trade has endured its most challenging period in living memory. The Covid-19 pandemic hit our taxi trade hard – with lockdowns introduced in March 2020 till December 2021 seeing business completely decimate as we experienced a drop in work by as much as 80-90%. Taxi drivers had faced a real danger every day risking their lives. At least 4 of our colleagues died of Covid-19, with others no doubt still suffering from the aftereffects of Covid. Taxi drivers as an occupation had raised rates of death of 65.3 deaths per 100,000 (The office of National Statistics). But our drivers were still out there courageously providing a public service in literally life-threatening circumstances.

### **Impact of financial crises.**

Just as we were seeing the tail end of the impact of Covid, the financial crises unfolded as the cost of living increased sharply across the UK during 2021 and 2022. The annual rate of inflation reached 11.1% in October 2022, a 41-year high, before easing in subsequent months. This put a huge strain on our trade and drivers were and still are feeling the financial strain and trying to make ends meet by struggling to provide for their family. It continues to impact those that were already struggling. Fuel prices continue to be unstable and are higher to what they were before the onset of Covid.

The financial strain of high levels of costs has had a huge impact on our drivers throughout this year and it'll take time for our drivers to recover.

Through the rise of home working, the loss of local nightlife and the wider effect of the cost of living on consumers themselves, how and why people use taxi services has changed.

### **Impact of industrial action.**

The industrial action which began around May 2022 further contributed to our woes as a trade. It caused a significant disruption to holidaymakers and commuters right through to April 2023 but the aftereffects are still felt with no end insight for industrial action and more particular, further rail strikes planned in December 2023.

The strike action had crippled many parts of the rail and bus networks, postal workers, civil servants, teaching staff and NHS staff. With fewer trains running, there are more people working from home, less people needing to come home at the end of the day, or in the middle of the day. So this is further impacting our earnings as we witness less people coming out of Oxford station. There was and still is a lot of sitting around on the ranks.

### **Botley Road closure and disruption to rail network.**

To add to this, we cannot avoid the further disruption to our livelihood due to the circumstances surrounding Oxford rail station. With the closure of Botley road, this means 40% less jobs for drivers heading west of city as almost all of those passengers are now no longer hiring cabs due to the long detour we have to make to get to the west of the city adding time and money to passenger journey. Where a journey would cost around £7-8 from Oxford train station to the Premier Inn in Botley, is now costing around £25-£30 as we have to go around the ring road and whilst doing so, getting stuck in the traffic both ways caused due to Botley road closure.

This closure and the works on Botley road will continue till October 2024 as we've been informed which will mean a continuous disruption to our operations and a further impact on our livelihoods for a further year from now. A total of 18 months of disruption.

### **ZEZ – The requirement to change current cabs to EV in 2025 needs to be delayed.**

The introduction of the Zero Emissions Zone (ZEZ) in Oxford is certainly a positive move. Our trade has had many communications and discussions about this policy when it was in its planning stage and consequently introduced in Oxford. As a trade, around 30% of our cabs are now zero emission capable, significantly reducing our carbon footprint. We are doing our bit.

However, in the current climate, change must be bridged with affordability. It requires careful thought and a balanced approach. Because of all the issues I have explained above, this change needs to be gradual as drivers now more than ever, need breathing space. The requirement on owners to change the remaining cabs to those that are zero emissions capable by 2025 has now become unrealistic and not achievable. We have lost out on what should have been almost 4 productive years from 2020 to current times and this will no doubt continue with a gloomy financial forecast until the end of next year 2024 due to the works on Botley road and the rail station.

As explained, around 30% of our drivers have made that switch from diesel to electric and had done so at the tail end of Covid when the situation started to improve, but just before the initiation of the industrial action in the U.K.

I'm sure you don't need reminding or see evidence of the fact that in terms of switching our diesel cabs to electric, we fair better than both our City Council and County Council whilst they transition from diesel to electric vehicles. They are far behind with many more vehicles that still run on diesel. You would think that they lead by example. Forcing our trade to be

100% electric, without recognising the huge financial burden that each Proprietor will face is totally unjust.

A grant of £5000 was provided then by the Environmental Sustainability team towards the end of 2021 to help owners make that switch. But even if a further grant was made available, it would have to be significantly more than the last amount for any owner to give it some consideration but very unlikely that any investment would be made.

Currently, owners are simply not financially secure in this volatile financial climate to invest in an electric cab which cost £65,000 cash price and over £70,000 on a loan agreement. On an initial deposit of £5000 for a new EV Cab, the owner of the cab would be paying over £800 a month instalments for the Cab over 5 years. This is a second mortgage. It is simply not affordable nor a viable option in the current climate. Its simply suicidal.

Many other factors need to be considered now when buying and owning an electric cab. The financial situation is undoubtedly different to what it was in 2018/19. Also, owners being accepted for a loan will be a factor as banks are not willing to lend. It is also important to highlight the fact that the price of energy has increased significantly to a higher rate when charging the electric cab. The cost difference to charge a cab or fill one with diesel is insignificant. So, drivers who are yet to invest are doing a cost comparison and are very concerned as there is no clear evidence of any benefit. Many of the electric cab owners are now running their cabs on petrol rather than electric because it's cheaper. There are currently no savings because the cost of charging has doubled.

The financial consequences for drivers forced to change in 2025 will be disastrous especially knowing the fact that each of those owners including myself are currently paying higher rates and double the amount in most cases on everything including mortgage, energy, food, clothing and maintenance on their current cabs. Taxi drivers can't work from home as many people are doing in many industries. Since the onset of Covid to current times, the trade has been impacted unimaginably and we are still suffering as a consequence.

### **An urgent need to improve our working conditions.**

Those of us in the trade are hopeful the economy can bounce back. I emphasise the importance of revisiting the emission standards policy and allowing the trade a further three years beyond 2025, giving us some breathing space so that we may regroup, reevaluate and hope our situation improves. It is equally important that our authority understands how it can help the trade to recover from the difficulties we have experienced almost over the last 4 years at least.

Our working conditions must be improved and this can be achieved by granting us access through the routes in Oxford which we are currently restricted to access. This includes allowing us 24-hour access through the 'link route' (Norfolk Street) which runs alongside the Westgate shopping Centre. Secondly, allowing our trade access through those roads which have been blocked due to the creation of low traffic neighbourhoods (LTNs). Since the introduction of LTNs which were introduced during the time the trade was suffering due to the above difficulties, road closures quite frankly was rubbing the salt in the wounds. Our

movements are currently limited, and we are regularly getting trapped in traffic jams. We pride ourselves in providing a door-to-door service but are forced to settle for bollard to bollard. We can't get to the vulnerable passengers, especially those that are disabled and in a wheelchair. We are having to refuse bookings if it means we have to go the long way round to get to the passenger. As an example, a passenger we pick up from the train station going to Headington during traffic time now takes 1 hour 45 minutes as a round trip. Where is the sense in that? This means passengers are having to wait longer at the ranks because it takes longer for us to get back to the ranks.

Queen street/Carfax rank - As I have mentioned previously, to have a 24-hour rank on the Queen Street/Carfax will give the trade a massive boost and help the drivers begin to recover from the challenges we have had and are currently experiencing. Furthermore, as the Carfax rank being in an area quite central to Oxford city and a focal point where drivers can operate from during the day, will certainly put us on the path of recovery and we will begin to make back some of the losses incurred due to the difficulties I have explained. This will gradually improve our situation. This is absolutely vital in light of the circumstances we are up against at Oxford rail station which will continue throughout next year also.

I hope that our concerns are truly understood and the fact that we have been through a very difficult patch, and we continue to do so as currently the future looks bleak. Without your support, we cannot be on the path to recovery.

We urge you to allow the trade a further three years until owners are required to change their current cab to an electric one which will give us till 2028. This doesn't mean that owners will wait till 2028. If our working conditions improve, then as has been the case previously, owners will begin to invest. But our working conditions need to improve, and we need to see action rather than words. Access through the 'link route' beyond 7pm is vital in order for us to get round to our ranks quicker. Allowing our trade access through where the bollards are installed in places of LTNs. Most importantly, to support our desire to have a 24-hour rank on Carfax.

Thank you to everyone for reading my letter. I apologise if it's taken up a considerable amount of your time, but it was necessary that all of our immediate concerns were raised. I am confident that yourself and those officers that are working with you in relation to the emissions standards policy will take our concerns on board and fully appreciate our plight.

We have always had an amicable relationship with our Councillors and Officers throughout the years and you have always been prepared to help and have helped when the trade has asked. I am confident that you will once again help the trade as we've been through and are still experiencing serious challenges.

We look forward to receiving a positive outcome.

Yours sincerely,

Mr. Sajad Khan  
Secretary of C. O. L. T. A  
(City of Oxford Licensed Taxicab Association; est. 1952)



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