



City of Oxford Licensed Taxicab Association *(Est. 1952)*

15 Belvedere Road,
Oxford, OX4 2AZ
coltaoxford@outlook.com
Tel: 07702031372

11th April 2025

To Oxford City Taxi Licensing,

RE: Emmisions Standards policy for Hackney Carriages

I am writing to formally request an extension to the Emission Standards policy that is scheduled to be implemented from January 2026.

As you are aware our taxi trade has been navigating through an exceptionally challenging period since Covid. The cumulative impact of challenges (further explained) has strained our resources and capabilities, making it incredibly tough for us to comply with the impending emissions standards within the given timeframe.

The taxi trade of Oxford has faced unprecedented challenges, from significant drops in passenger numbers particularly at the train station due to people working from home and the lack of a daytime taxi rank in the heart of the city centre (Queen street). The permanent shutdown of nightclubs is another major blow, including the continued closure of Botley Road. The uncertainty about a Unitary Council and how that would impact our taxi trade. Also, the introduction of Uber in Oxford and how that's significantly impacted our operations with Uber's unfair pricing structure which no locally licensed operators can match.

These issues have created financial hardships that has left our drivers struggling to stay afloat including those who are currently struggling to pay monthly instalments on their electric taxi.

An attempt to deregulate our trade

This issue is connected to all the difficulties we are currently experiencing, it is important that I explain how this development has sent shockwaves to the trade.

A cloud of uncertainty had been forced upon us by our licensing department where in their recent report which was scheduled to be presented to the GPLC on 10th February

2025 but withdrawn prior to the meeting, the licensing officer responsible recommended to deregulate the Hackney Carriage trade. This recommendation was very alarming and our drivers were in a state of shock, especially given the significant investment we have been asked to make in purchasing the electric taxi which costs above £102,000 for a new one to purchase.

Our trade requires assurances. On one hand we are being pushed to invest heavily in electric taxis, which is a considerable financial commitment, on the other hand, there are ongoing discussions about deregulating the trade, which are contradictory and nonsensical. We need clarity and assurance that our investments will be protected and that the trade regulation will remain.

It is crucial for the readers to understand the full implications of deregulation and how it will impact our business and future investments. As has been the case in previous years, an independent met/unmet demand survey ought to be carried out which in previous years has provided the licensing office with valuable data.

Uber granted a licence

The trade was astonished to learn that Uber were granted a license towards the end of 2024 to operate in Oxford. There was no prior discussions with any licensing officer informing us that Uber had applied and this development seemed obscure. We were informed by a telephone conversation by taxi licensing the day Uber was granted the license to operate.

Uber's introduction to Oxford is already having an impact on our trade. They are a billions of pounds multinational entity currently offering up to 50% discount to passengers during a promotional period. Uber then pay extra to their drivers (top up) during the surcharge period throughout the day. As one example, the passenger may pay £5 (discounted) from the train station to the John Radcliffe Hospital. The driver will get paid £25 by Uber because it's a surcharge period. No taxi operator can compete with this pricing structure and it's unfair competition with unregulated practices.

Uber have a lot of money and they can pump millions of pounds into their business model in any particular city like Oxford and in the process, put the local taxi trade and the private hire operators out of business.

Another concern is Uber drivers licensed outside of Oxford but coming and operating in Oxford. We have seen licensed vehicles arriving from Reading, Portsmouth and Wolverhampton operating in our city. If the floodgates are allowed to be left open like this, we will see an unbearable level of vehicles operating for Uber and flooding our city.

We have no idea what discussions had taken place between Uber and our licensing department and whether concerns were raised about the increased levels of vehicles

licensed to work in Oxford. We believe that the committee needs clarification including the full details of the discussions had between Uber and the licensing department.

On a final point here, up until the licensing of Uber in November 2024, in Oxford there were 772 private hires plus 400 out of town taxis making it a total of 1172 vehicles operating in Oxford. In light of Uber's introduction to Oxford, it is most likely that this number will increase significantly as more drivers gain a license in Oxford (who may not live in the city) and others travelling from outside of Oxford but operating within the city. This will prove problematic in the very near future as the plans to reduce the number of vehicles in the city centre will be difficult to keep in check and it will have a negative impact on the level of emissions when it is this very issue we are forced to invest even though the level of emissions we are seen to be responsible for is insignificant. The report on this is available.

Botley Road closure

The prolonged closure of Botley Road is continuing to have a huge impact on our operations. The road has been closed since March 2023. The proposed reopening date in October 2026 is uncertain in light of the previous deadlines that have been missed. This continued closure is significantly impacting our movements and livelihoods. We have lost all of our work going and returning from the west of the city centre.

Delay to ZEZ

The introduction of the expanded Zero Emissions Zone (ZEZ) is also delayed. As you are aware, the introduction of the expanded ZEZ was initially planned to begin in 2025 but due to setbacks because of other issues including the Botley Road closure, this planned zone is now facing further delays and we are told it will be introduced in late 2027 or beginning of 2028. This is uncertain as the introduction of the ZEZ is dependent on the opening of the Botley Road.

The whole reason for the push to change our diesel taxi to electric ones was tied in with the plans for a zero emission zone. As we know, the introduction of an expanded ZEZ is not happening until at least 2028. Therefore, our trade cannot be forced into complying to an expanded ZEZ which will not be introduced for another 2 to 3 years from now. In fact, this now gives all of us the opportunity to work towards an expanded ZEZ and allowing the trade up until 2028 to gradually change our remaining diesel vehicles to electric cabs. A gradual change is a positive move and has worked over the previous five years where drivers have been able to change their cabs during this whole process.

Unitary council

The discussions based around the plans for a unitary council is another major development which has created anxiety within the trade. There are many unanswered questions at the moment and no one is sure how the plans for a unitary council will impact Oxford businesses as a whole but more importantly, the impact on our taxi trade.

If a single licensing authority was to be introduced incorporating a larger area for Oxford, undoubtedly those vehicles licensed outside of Oxford will then be operating freely within the current boundary lines of Oxford and this will have a significant impact on many aspects not only impacting our trade, but the whole of Oxford city.

In light of the above difficulties described and the potential introduction of a unitary council, currently we strongly feel that it would be highly unreasonable and unjust that we are forced in to making a huge investment in purchasing the electric taxi so soon from January 2026 onwards. We are seeking your understanding and support in granting us additional time to make the switch to meet the emission standards. This extension would not only provide much-needed relief but also ensure that we can transition more smoothly and sustainably towards the new regulations. This would also enable our Licensing department to consider how best to deal with other factors which are upon us and described in this letter and then make a balanced decision.

Given the above circumstances, we request additional time to transition our remaining diesel taxis to electric taxis. Out of a fleet of 107 Hackney carriages, thirty eight (38) owners have already transitioned to electric cabs. License holders have always been committed to the emission standards policy and other requirements that our licensing department have instructed us to do.

The above issues described are certainly valid and undoubtedly impacted the timeline for transitioning to electric taxis in 2026. We believe that with extra time to switch, the remaining license holders can ensure a smooth and successful transition to electric taxis, aligning with the goals of the ZEZ in 2028.

We are committed to adhering to the environmental goals outlined in the policy and believe that with more time, we can effectively align our operations to meet the required standards. Your support in this matter would be much appreciated.

Yours sincerely,

A handwritten signature in black ink, consisting of several overlapping loops and a final flourish.

Sajad Khan
Secretary of C. O. L. T. A.

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