

Licensing Authority
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3rd Floor, St. Aldate's Chambers
109 St. Aldate's
Oxford
OX1 1DS

Central Number: 01865 249811

APPENDIX ONE



Date: 23rd April 2013
Our Ref: Taxi Licensing
Your Ref: Consultation

Dear

HACKNEY CARRIAGE & PRIVATE HIRE: CONSULTATION

EURO EMISSIONS & VEHICLE AGE LIMITS

The General Purposes Licensing Committee requested that the Head of Environmental Development carry out consultation with the Hackney Carriage and Private Hire trade on proposed changes to the criteria for all Hackney Carriage & Private Hire Vehicles licensed by Oxford City Council.

These proposed changes are being considered by the City Council in order to reduce carbon emissions in keeping with other forms of public transport, to enhance the quality of vehicle safety offered to the public, and to promote Oxford as a world class city.

The Council is seeking your views as a stakeholder within the licensed taxi trade to the proposals put forward in this letter. Your responses will inform the decision on any changes to the criteria for Vehicle Age Limits, and will be considered alongside the wider financial climate and circumstances faced by licence holders. The decision as to whether to introduce new vehicle age limits will be considered by the Committee following the close of the consultation period in Summer 2013, so it is important that you make your views known.

The proposals are:-

a) New Vehicle Licence:

- **From 1st January 2014 a licence will not be granted if the vehicle is 5 years of age or more from the date of its first registration.**

b) Renewal of Vehicle Licence:

- **From 1st January 2014 no licence will be renewed if the vehicle is 8 years of age or more from the date of its first registration.**

The introduction of the upper age limit is intended to ensure that the vehicles operated as Taxis and Private Hire produce lower exhaust emissions, uphold the safety of the travelling public, and lead to a gradual modernisation of the operating fleet.

The consultation asks you:

1. Do you agree or disagree that Oxford City Council should have a plan to reduce carbon emissions and improve vehicle safety?
2. Do you agree or disagree that this can be achieved by putting an upper age limit on hackney carriages and private hire vehicles?
3. Do you agree or disagree with the proposals for an upper age limit of “under 5 years of age” for any vehicle submitted for a new licence?
4. Do you agree or disagree with the proposals for an upper age limit of “under 8 years of age” for any vehicle submitted for the renewal of an existing licence?
5. If you disagree with these proposals, please let us know how you would suggest we achieve our carbon emissions reduction and improvements in vehicle safety.

You can respond to this consultation in the following ways:

1. **In writing to: Licensing Authority, Oxford City Council, 3rd Floor St Aldate's Chambers, 109 St Aldate's, Oxford, OX1 1DS.**
2. **By email to: licensing@oxford.gov.uk**
3. **By submitting an online response via: [insert online consultation weblink](#)**

If you submit your response either in writing or by email, please put “Euro Emissions & Vehicle Age Limits” as the subject of your correspondence.

This consultation will run from 1st May 2013 until 12th June 2013.

The outcome from this consultation will be reported to the General Purposes Licensing Committee in Summer 2013 so that members are aware of your views when making their decisions.

Yours sincerely,



John Copley
Head of Environmental Development

APPENDIX TWO

From: COLTA OXFORD
Posted At: 10 June 2013 12:19
Posted To: licensing@oxford.gov.uk
Conversation: Age limits and Euro Emissions consultation
Subject: Age limits and Euro Emissions consultation
Dear Taxi Licensing team,

Thankyou for the opportunity to respond to the consultation document you sent out in relation to the afore-mentioned heading.

In relation to the age limits COLTA agrees a limit needs to be set in place around vehicle age and we would like to propose 10 and 15 years upper age limit respectivley.

This would reflect vehicle shelf life and durability in line with regular maintenance and MOT'S.

We firmly believe that the Black Cab's are designed to last a decent life span spanning into a couple of decades as long as they are looked after and serviced regularly including upkeep of the body and coach work.

With regards to the Euro Emission limits all of the Black Cab's pass the test level regularly and it is proven the TX1 LTI vehicle is less polluting than the TX4 and 5. With this in mind there is a clear corolation between the age limits we have requested as the vehicles meet the emissions standards, even at TX1 model standards.

However due to wear, tear and in some cases neglect, some Black Cab's may fall by the wayside in regards to looking and performing within the prescribed technical limits as set by local authoroty. For this reason there needs to be regulation of age limits etc, however a realistic set of reulations though which we have proposed as 10 and 15 years.

Please do not hesitate to contact me if any futher information is required.

Kind Regards,
n the behalf of COLTA.

The Licensing Authority
Oxford City Council

14 JUN 2013

Licensing Authority
Oxford City Council
Mr John Copley
3rd Floor, St Aldate's Chambers
Oxford, OX1 1DS

Dear Mr Copley,

Re: Euro Emissions & Vehicle Age Limits

I write with reference to the letter dated 23rd April 2013.

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

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 believe you are acting in haste and being unreasonable by pre-empting the final findings of the Taxi Law Commission Reform and you have given no valid legitimate reasons for doing so.

In your consultation letter you have asked 5 questions and my response is as follows:

1. I have no problem with the Council having a plan to reduce carbon emissions and improve vehicle safety. However, I fail to understand how my vehicle and my colleague's vehicles are deemed unsuitable and unsafe if they are 8 years or over of age, when our taxi vehicles undergo stringent twice yearly compliance tests. Perhaps the council would like to explain this to me and other taxi drivers?
2. I strongly disagree with your assertion that carbon emissions can be reduced and vehicle safety can be improved by imposing an upper age limit on Hackney carriages and Private Hire Vehicles.

I copy a quote from DFT Taxi and Private Hire Vehicle Licensing: Best Practice Guide; Para 32

"AGE LIMITS. It is perfectly possible for an older vehicle to be in good condition. So setting of an age limit beyond which a local authority will not license vehicles may be arbitrary and inappropriate. But a greater frequency of testing may be appropriate for older vehicles – for example twice – yearly tests for vehicles over 5 years old"

3. I have no objections for an upper age limit of "under 5 years of age" for any vehicle submitted for a new licence.
4. I strongly disagree with the proposal for an upper age limit of "under 8 years of age" for any vehicle submitted for a renewal of an existing licence. See my reply to No's 1 and 2.
5. I refer you to my reply to No's 1 and 2. Perhaps the council should consider targeting the real gas guzzlers that are causing emissions problems in Oxford and stop discriminating against the Taxi business who are subjected to stringent twice yearly compliance tests. I am referring to buses and coaches.

I would like the council to present evidence of how the quality of vehicle safety offered to the public has been in any way compromised by taxi vehicles that are 8 years or over of age to come to an arbitrary 8 year age cut off point.

I urge you to re-consider your proposals.

Yours sincerely

Licensing Authority
Oxford City Council
Mr John Copley
3rd Floor, St Aldate's Chambers
Oxford, OX1 1DS

Dear Mr Copley,

Re: Euro Emissions & Vehicle Age Limits

I write with reference to the letter dated 23rd April 2013.

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

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.

My response to your consultation letter is as follows:

1. I have no problem with the Council having a plan to reduce carbon emissions and improve vehicle safety.
2. I strongly disagree with your assertion that carbon emissions can be reduced and vehicle safety can be improved by imposing an upper age limit on Hackney carriages and Private Hire Vehicles.
3. I have no objections for an upper age limit of "under 5 years of age" for any vehicle submitted for a new licence.
4. I strongly disagree with the proposal for an upper age limit of "under 8 years of age" for any vehicle submitted for a renewal of an existing licence. I think an **upper age limit of 12 years** would be fair and reasonable.

I urge you to re-consider your proposals.

Yours sincerely

The Licensing Authority
Oxford City Council

11 JUN 2013

1st May 2013

Licensing Authority
Oxford City Council
Mr John Copley
3rd Floor, St Aldate's Chambers
Oxford, OX1 1DS

Dear Mr Copley,

Re: Euro Emissions & Vehicle Age Limits

I write with reference to the letter dated 23rd April 2013.

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

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.

It is evident that you have not taken into account the spiralling cost of fuel, insurance, road tax, council plate, badge, 2 compliance tests and regular ongoing maintenance costs.

I believe you are being hasty and unreasonable by pre-empting the final findings of the Taxi Law Commission Reform and you have given no valid legitimate reasons for doing so.

In your consultation letter you have asked 5 questions and my response is as follows:

1. I have no problem with the Council having a plan to reduce carbon emissions and improve vehicle safety. However, I fail to understand how my vehicle and my colleague's vehicles are deemed unsuitable and unsafe if they are 8 years or over of age, when our taxi vehicles undergo stringent twice yearly compliance tests. Perhaps the council would like to explain this to me and other taxi drivers?
2. I strongly disagree with your assertion that carbon emissions can be reduced and vehicle safety can be improved by imposing an upper age limit on Hackney carriages and Private Hire Vehicles.

I copy a quote from DFT Taxi and Private Hire Vehicle Licensing: Best Practice Guide; Para 32

"AGE LIMITS. It is perfectly possible for an older vehicle to be in good condition. So setting of an age limit beyond which a local authority will not license vehicles may be arbitrary and inappropriate. But a greater frequency of testing may be appropriate for older vehicles – for example twice – yearly tests for vehicles over 5 years old"

3. I have no objections for an upper age limit of "under 5 years of age" for any vehicle submitted for a new licence.
4. I strongly disagree with the proposal for an upper age limit of "under 8 years of age" for any vehicle submitted for a renewal of an existing licence. See my reply to No's 1 and 2.
5. I refer you to my reply to No's 1 and 2. Perhaps the council should consider targeting the real gas guzzlers that are causing emissions problems in Oxford and stop discriminating against the Taxi business who are subjected to stringent twice yearly compliance tests. I am referring to buses and coaches.

I take strong issue with paragraph 2 of the letter dated 23.04.2013. It is an established fact that Oxford is a world class city due to its history and reputation. I would like to understand how its status will be further enhanced by imposing arbitrary age limits on taxis operating in Oxford.

I would like the council to present evidence of how the quality of vehicle safety offered to the public has been in any way compromised by taxi vehicles that are 8 years or over of age to come to an arbitrary 8 year age cut off point. I am open to persuasion if compelling evidence is provided as requested.

I urge you to re-consider your proposals.

Yours sincerely

The Licensing Authority
Oxford City Council

12 JUN 2013

Licensing Authority
Oxford City Council
Mr John Copley
3rd Floor, St Aldate's Chambers
Oxford, OX1 1DS

Dear Mr Copley,

Re: Euro Emissions & Vehicle Age Limits

I write with reference to the letter dated 23rd April 2013.

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

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.

In your consultation letter you have asked 5 questions and my response is as follows:

1. I have no problem with the Council having a plan to reduce carbon emissions and improve vehicle safety. However, I fail to understand how my vehicle and my colleague's vehicles are deemed unsuitable and unsafe if they are 8 years or over of age, when our taxi vehicles undergo stringent twice yearly compliance tests. Perhaps the council would like to explain this to me and other taxi drivers?
2. I strongly disagree with your assertion that carbon emissions can be reduced and vehicle safety can be improved by imposing an upper age limit on Hackney carriages and Private Hire Vehicles.

I copy a quote from DFT Taxi and Private Hire Vehicle Licensing: Best Practice Guide; Para 32

"AGE LIMITS. It is perfectly possible for an older vehicle to be in good condition. So setting of an age limit beyond which a local authority will not license vehicles may be arbitrary and inappropriate. But a greater frequency of testing may be appropriate for older vehicles – for example twice – yearly tests for vehicles over 5 years old"

3. I have no objections for an upper age limit of "under 5 years of age" for any vehicle submitted for a new licence.

4. I strongly disagree with the proposal for an upper age limit of "under 8 years of age" for any vehicle submitted for a renewal of an existing licence. See my reply to No's 1 and 2.
5. I refer you to my reply to No's 1 and 2. Perhaps the council should consider targeting the real gas guzzlers that are causing emissions problems in Oxford and stop discriminating against the Taxi business who are subjected to stringent twice yearly compliance tests. I am referring to buses and coaches.

It's difficult to understand how the quality of vehicle safety offered to the public has been in any way compromised by taxi vehicles that are 8 years or over of age to come to an arbitrary 8 year age cut off point.

I urge you to re-consider your proposals.

Yours sincerely

Badge No:

Name
Badge

Date 25.05.13

Dear, Sir/Madam

I have read the letter that the General Purposes Licensing Committee has requested that the Head of Environmental Development carry out this consultation.

I would like to put my views on the Hackney Carriage & Private Hire Consultation.

Euro Emission & Age Limits.

Financially I believe this proposals should not go through.

I would disagree with this Consultation on the grounds of no to Age Limit & Euro Emission far to costly.

Economy has taken a big Drop & people are being more wisely in choice.

Kind Regards

The Licensing Authority
Oxford City Council

Licensing Authority

109 St. Aldates

Oxford OX1 1DS.

The Licensing Authority
Oxford City Council

Dear Sir Madam.

RE. HACKNEY CARRIAGE + Private Hire Hire CONSULTATION
EURO EMISSIONS + VEHICLE AGE LIMITS.

I AM WRITING TO YOU RE THE ABOVE AND YOUR PROPOSALS.

①: NEW VEHICLE LICENSE WILL NOT BE GRANTED IF THE VEHICLE IS 5 YEARS & OF AGE OR MORE FROM THE DATE OF FIRST REGISTRATION.
= I AGREE WITH THIS PROPOSAL. =

②: RENEWAL OF VEHICLE LICENSE. (JANUARY 2014)
NO LICENSE WILL BE RENEWED IF THE VEHICLE IS 8 YEARS OF AGE OR MORE FROM THE DATE OF FIRST REGISTRATION.
= I DO NOT AGREE WITH THIS PROPOSAL.

THE REASONS BEING IT IS TOO SEVERE DUE TO THE INITIAL HIGH COST OF THE VEHICLE AND THE EXPENSIVE UP KEEP OF THESE VEHICLES.
I THEREFORE FEEL A MORE REALISTIC AND FAIRER AGE LIMIT WOULD BE 10 YEARS.

I GENERALLY AGREE WITH THE PROPOSALS 1 TO 5 REGARDING LOWER EMISSIONS AND OF COURSE UPHOLDING THE SAFETY OF THE TRAVELLING PUBLIC LEADING TO A GRADUAL MODERNISATION OF THE FLEET.
MY ONLY OBJECTION IS AS I HAVE STATED ABOVE IS ITEM FOUR THE UPPER AGE LIMIT WHICH I FEEL SHOULD BE 10 YEARS INSTEAD OF 8 YEARS.

Yours Faithfully.

30-09-13

Dear Sir

I am writing to you regarding the age limit and Euro emissions exercise. It would be very damaging if this goes to fruition. My our taxis are MOT'd twice a year and the emission test are passed as well as the taxis's are keep in excellent condition. Business has also dropped due to the recession we are in. Other cities such as London and Reading have to change their taxis every 20 years, I feel this standard should also be applied to us in the city of Oxford as well.

The cost of a taxi is between £35 000 to £40 000 so changing a taxi every 5 or 8 years would have a serious affect on our lively hood.

I urge the council to help us oppose this proposal and set a 20 year limit like other cities.

In Summary

I agree that carbon emissions should be reduced using a cost affective strategy

I disagree that an upper age limit on hackney carriages and private hire vehicles will help this (reasons stated above)

I disagree for an upper age limit of "under 5 years" for new licence

I disagree for an upper age limit of "under 8 years of age" for renewal existing licence.

I disagree with both proposals as this will question the viability of the taxi business in Oxford, Also the proposal does not offer a subsidy to assist the proposal as it has with bus companies in Oxford which is unfair.

Regards

Ref.: Euro Emissions & Vehicle Age Limits

Dear Taxi Licensing team member,

I am writing in response to your letter dated 23rd April 2013 with reference to Consultation. With regard to point

1. I think it would be great if Oxford City Council would have a plan to reduce carbon emissions and to improve vehicle safety
2. Both these points could be achieved by putting an upper age limit on "taxis". Additionally, stricter guidelines with regard to emissions could be enforced at the six monthly MOT test. Maybe the council could introduce a reduced licence price for electric/hybrid cars?
3. I strongly agree with the proposals for an upper age limit of under 5 years for newly submitted vehicles for licensing
4. I strongly agree with the proposals for an upper age limit of under 8 years for any vehicle submitted for licence renewal

Further, with regard to safety, I believe that it is as important for a driver to be driving safely as it is for the vehicle to be safe. Hence I would like to repeat my suggestion of introducing a compulsory 'Advanced Driving Course' for hackney- and private hire badge holders. Since the council would be sending 100s of drivers to undertake the course, I am sure it could negotiate a favourable price with OAGAM or WSM. If the council took a percentage of the discount for administrative purposes, it's additional costs would be accounted for [e.g. the course costs £140, the council negotiates a 30% discount (the course would effectively then cost £98), the council keeps 5% (£7) for administration fees, the driver would be getting a 25% discount (and pay £105 for the course)]. Drivers should, and hopefully would be thankful for the opportunity to take a discounted advanced driving course and, more importantly, Oxford's roads would be safer.

I hope this has been useful to the Licensing Authority.

With kind regards and best wishes,

Hackney Carriage and Private Hire: Consultation

The consultation asks you:

1. Do you agree or disagree that Oxford City Council should have a plan to reduce carbon emissions and improve vehicle safety?

1. Please enlighten me as to how I can reduce my emissions

And make my vehicle safer.

EMISSIONS: I currently drive an 09 Toyota Avensis which according to Cowley Marsh testing equipment gives off emissions so low that the test sensors fail to register them.

SAFETY: My vehicle has an M.O.T (Certificate of Compliance) Twice a year which it continually passes, please feel free to tell me how this vehicle in your opinion is not safe and how you think it can be made safer?

2. Do you agree or disagree that this can be achieved by putting an upper age limit on hackney carriages and private hire vehicles?

2. Direct Quote from the DFT Taxi And Private Hire Vehicle Licensing: Best Practice Guide; Para 32

"AGE LIMITS. It is perfectly possible for an older vehicle to be in good condition. So setting of an age limit beyond which a local authority will not license vehicles may be arbitrary and inappropriate. But a greater frequency of testing may be appropriate for older vehicles – for example twice-yearly tests for vehicles over 5 years old."

3. Do you agree or disagree with the proposals for an upper age limit of "under 5 years of age" for any vehicle submitted for a new licence?

3. I agree there should be an upper age limit of 5 years for first registration.

4. Do you agree or disagree with the proposals for an upper age limit of "under 8 years of age" for any vehicle submitted for the renewal of an existing licence?

4. I strongly disagree with a renewal age limit of 8 years.

My vehicle's brand new on the road price is £24100. To be able to purchase a like for like vehicle every 8 years I would need a minimum of £58 per week

disposable income (£58x416=£24128). I don't have £58 a week disposable income, unless you would like me to work about 16 hours a day 7 days a week to make up the shortfall in my income? Why should I financially burden myself when I have a vehicle that produces near zero emissions and continues to pass a certificate of compliance?

5. If you disagree with these proposals, please let us know how you would suggest we achieve our carbon emissions reduction and improvements in vehicle safety.

5. Unless Oxford City Council is planning to start manufacturing vehicles to their own safety standards there is absolutely no way you can make a vehicle that passes a certificate of compliance any safer. As regard to the emissions, try removing about 50% of the empty busses and coaches that trundle through Oxford on an hourly basis. An empty private hire vehicle is only moving when it is on its way to pick up a fare.

Extract from Taxi Licensing response to the new law commission

"The Council also believes that age limits should be permitted to be imposed on all vehicles to ensure a continual improvement in line with safety standards, emission levels and the image of the City."

So having deduced that my vehicle has extremely low emissions and a high standard of safety I guess the only other thing would be the image? So would I be correct in assuming that what you are really saying is that a vehicle over 8 years old in your opinion no longer fits in with "The image of the city"

Dear Sir/Madam,

I am writing in response to your letter regarding age limit on Taxis.

I believe that you are fully aware of economic situation of the country. There is no much work for Taxis any where. A new Taxi costs about £43000 for 5 years plan i.e. about £25 per day. maintenance is about £15 a day plus insurance, council Lic. fee and badge fee etc. Fuel is about £1.45 a litre it needs about £25 a day for fuel. It makes about £65 a day cost to run a new Taxi - before we make any profit. The city is too small our average fare is about £6/50 and sometimes we have to wait forty five minutes or more for a job.

Practically it is not possible for us to change the vehicles every 8 years.

Reading has ²⁰15 years limit London got 15 years now we can have 8 years.

I believe that age limit should be minimum of 20 years.

As far as other transport (buses) are concerned they are subsidised, while we get nothing.

We get M.O.T. every 6 months - if a Taxi is not road worthy, how it passes the M.O.T.

I strongly oppose the idea of 8 years - it should be at least 20 years.

Licensing Authority
Oxford City Council

Thanks.

Oxford City Council
Licensing Authority
3rd floor ST. Aldate's Chambers
109 ST. Aldate's
Oxford
OX1 1DS

The Licensing Authority
Oxford City Council

- 5 JUN 2013

Dear sir/madam,

Reg. Euro Emissions & Vehicle Age Limits

1. I disagree that Oxford City Council should have a plan to reduce carbon emissions and improve vehicle safety.
2. I disagree that this can be achieved by putting an upper age limit on hackney carriages and P.H.V.
3. I disagree with the proposals for an upper age limit of fewer than 5 years of age for any vehicle submitted for a new licence.
4. I disagree with the proposals for an upper age limit of fewer than 8 years of age for any vehicle submitted for renewal of an existing licence.
5. You already do M.O.T. every six months for these checks, but I believe these questions should go to companies got financials of money.
6. As we know this business is self-employment so that earning is not guarantee and secured especially when

the earning comes from the operators who do their own business first. For example I borrowed £10,000 to buy my car and I made it a taxi also the car before I borrowed the same amount of money to buy the car and I also made it a taxi.

Finally, it always depends on the circumstances of each driver if can afford to buy or cannot.

Yours sincerely

From:
Posted At: 11 June 2013 16:07
Posted To: licensing@oxford.gov.uk
Conversation: Euro Emissions & Vehicle Age Limits
Subject: Euro Emissions & Vehicle Age Limits
Dear Sir/Madam

I, [redacted] as a hackney carriage driver [redacted] would like to put forward my views on the euro emissions and vehicle age limits. I do not agree that by putting up an upper age limit on hackney carriages will make a difference. This is because our vehicles have an MOT check twice a year, which ensures our maintenance in our vehicles and that they are in good working condition. Although, I do agree that new license holders should have an upper age limit of under 5 years of age. However, I strongly disagree with the proposal for an upper age limit of under 8 years of age for any vehicle submitted for the renewal of an existing license. This is because our vehicles are in good condition and they are consistently passing the MOT twice a year and are running efficiently, and they should still be on the road whilst they are doing so, which highlights that there's no need for an age limit. The council should also consider how the older cars, lorries and vans in the city that affect the carbon emissions as well.

Best Regards

From:
16:20 Posted To: licensing@oxford.gov.uk
Conversation: Age limit consultation
Subject: Age limit consultation

Posted At: 11 June 2013

Dear licensing officer

Regarding the age limit of Hackney carriage and private hire vehicle's there are many issues we can discuss but some are very important like Hackney carriages are purpose built cars they have no other use in public sector their safety features .they also built for long serving to the trade. In Oxford we have two MOTs plus time to time spot checks that gives more assurances that cars are up to a good standard.

From:
Posted
Posted To: licensing@oxford.gov.uk
Conversation: Taxi age limits
Subject: Taxi age limits
Licensing Authority
Oxford City Council
Mr John Copley
3rd Floor, St Aldate's Chambers
Oxford, OX1 1DS

Dear Mr Copley,

Re: Euro Emissions & Vehicle Age Limits

I write with reference to the letter dated 23rd April 2013.

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

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.

It is evident that you have not taken into account the spiralling cost of fuel, insurance, road tax, council plate, badge, 2 compliance tests and regular ongoing maintenance costs.

In your consultation letter you have asked 5 questions and my response is as follows:

I have no problem with the Council having a plan to reduce carbon emissions and improve vehicle safety. However, I fail to understand how my vehicle and my colleague's vehicles are deemed unsuitable and unsafe if they are 8 years or over of age, when our taxi vehicles undergo stringent twice yearly compliance tests. Perhaps the council would like to explain this to me and other taxi drivers?

I strongly disagree with your assertion that carbon emissions can be reduced and vehicle safety can be improved by imposing an upper age limit on Hackney carriages and Private Hire Vehicles.

I copy a quote from DFT Taxi and Private Hire Vehicle Licensing: Best Practice Guide; Para 32

"AGE LIMITS. It is perfectly possible for an older vehicle to be in good condition. So setting of an age limit beyond which a local authority will not license vehicles may be arbitrary and inappropriate. But a greater frequency of testing may be appropriate for older vehicles – for example twice – yearly tests for vehicles over 5 years old"

I have no objections for an upper age limit of "under 5 years of age" for any vehicle submitted for a new licence.

I strongly disagree with the proposal for an upper age limit of "under 8 years of age" for any vehicle submitted for a renewal of an existing licence. See my reply to No's 1 and 2.

I refer you to my reply to No's 1 and 2. Perhaps the council should consider targeting the real gas

guzzlers that are causing emissions problems in Oxford and stop discriminating against the Taxi business who are subjected to stringent twice yearly compliance tests. I am referring to buses and coaches.

I take strong issue with paragraph 2 of the letter dated 23rd April, 2013. It is an established fact that Oxford is a world class city due to its history and reputation. I would like to understand how its status will be further enhanced by imposing arbitrary age limits on taxis operating in Oxford.

I urge you to re-consider your proposals.

Yours sincerely

Sent from Samsung Mobile

From:

Posted At: 10 June 2013 15:52

Posted To: licensing@oxford.gov.uk

Conversation: Taxi license

Subject: Taxi license

Dear sir/Madam,

I am writing in regards to the age limit of Hackney carriage and private hire vehicle. In regards to this my opinion is that the purpose build taxis like tx1, tx2, tx4 are all built for the long servicing to trade their public safety. We will not find any other car/taxis like LTI. Oxford city council already keeps an eye on all the vehicles having MOT twice a year and spot checks are made regularly time to time. In regards with buying a taxi every 8-10 years will be impossible as i cannot afford it as they are too expensive. I hope you understand and hope to hear from you soon.

Many thanks,

From: _____ Posted At: 30 April 2013 15:51
Posted To: licensing@oxford.gov.uk
Conversation: Euro emissions and vehicle age limits
Subject: Euro emissions and vehicle age limits

In relation to the proposal of not allowing drivers to renew there vehicles if they are 8 years old, i would like to say this is highly unfair!!!! I purchased my car in 2009 and am Still paying for it (installment plan) , you are going to be putting me at risk of being unemployed as i would no longer have a vehicle to drive!, and how many other drivers would be in the same predicament, i would urge you to reconsider even proposing such a proposal, your sincerely,|

Sent from my iPhone

From:
Posted At: 27 April 2013 21:03
Posted To: licensing@oxford.gov.uk
Conversation: Hackney Carriage Consultation
Subject: Hackney Carriage Consultation

Date 01.05.2013

Carbon emissions of Oxford City.

You the Oxford City Council, The General Purpose Licensing Committee, Head of Environmental Development & Taxi Licensing Office should be working with the Hackney Carriage trade. By funding and finding a less cost effective way (more cheaper way) in reducing the Carbon emission in the Hackney Carriages of Oxford City.

The amount of income and growth in which our Oxford City Council , Local authorities & Taxi Licensing office has made. I can only hope that you put it back into the Hackney Trade only and help it grow once again.

How would you feel even though your Vehicle meets all the standard set by the local authorities In it's Safety checks for road worthy and it passed all the test. But you still had to change that vehicles because there is a age limit set on it now?

Special news the Hackney Carriage trade forecast of work is down and growth is unlikely to rise for the next 5 to 8 years from 2013, even with the pay rise which we got this year.

The Hackney Carriage trade of Oxford City is not what it was in work wise 20 to 50 Years ago.

The Hackney Carriage trade is completely dying out.

Why because our local city council and other authorities are more happy in developing the Private Hire and the buses sector.

From my point of view I disagree with the age limit and if the City of Oxford Council can't help in funding then I would disagree with everything that is put forward by the local authorities for the Hackney Carriage Consultation.

Kind Regards

From:|
Posted At: 03 May 2013 21:01
Posted To: licensing@oxford.gov.uk
Conversation: Consultation
Subject: Fwd: Consultation

Subject: Consultation

Licensing Authority
Oxford City Council
Mr John Copley
3rd Floor, St Aldate's Chambers
Oxford, OX1 1DS

Dear Mr Copley,

Re: Euro Emissions & Vehicle Age Limits

I write with reference to the letter dated 23rd April 2013.

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

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.

It is evident that you have not taken into account the spiralling cost of fuel, insurance, road tax, council plate, badge, 2 compliance tests and regular ongoing maintenance costs.

I believe you are being hasty and unreasonable by pre-empting the final findings of the law commission and you have given no valid legitimate reasons for doing so.

In your consultation letter you have asked 5 questions and my response is as follows:

1.

I have no problem with the Council having a plan to reduce carbon emissions and improve vehicle safety. However, I fail to understand how my vehicle and my colleague's vehicles

are deemed unsuitable and unsafe if they are 8 years or over of age, when our taxi vehicles undergo stringent twice yearly compliance tests. Perhaps the council would like to explain this to me and other taxi drivers?

2.

I strongly disagree with your assertion that carbon emissions can be reduced and vehicle safety can be improved by imposing an upper age limit on Hackney carriages and Private Hire Vehicles.

I copy a quote from DFT Taxi and Private Hire Vehicle Licensing: Best Practice Guide; Para 32

“AGE LIMITS. It is perfectly possible for an older vehicle to be in good condition. So setting of an age limit beyond which a local authority will not license vehicles may be arbitrary and inappropriate. But a greater frequency of testing may be appropriate for older vehicles – for example twice – yearly tests for vehicles over 5 years old”

3.

I have no objections for an upper age limit of “under 5 years of age” for any vehicle submitted for a new licence.

4.

I strongly disagree with the proposal for an upper age limit of “under 8 years of age” for any vehicle submitted for a renewal of an existing licence. See my reply to No’s 1 and 2.

5.

I refer you to my reply to No’s 1 and 2. Perhaps the council should consider targeting the real gas guzzlers that are causing emissions problems in Oxford and stop discriminating against the Taxi business who are subjected to stringent twice yearly compliance tests. I am referring to buses and coaches.

I take strong issue with paragraph 2 of the letter dated 23.04.2013. It is an established fact that Oxford is a world class city due to its history and reputation. I would like to understand how its status will be further enhanced by imposing arbitrary age limits on taxis operating in Oxford.

I would like the council to present evidence of how the quality of vehicle safety offered to the public has been in any way compromised by taxi vehicles that are 8 years or over of age to come to an arbitrary 8 year age cut off point. I am open to persuasion if compelling evidence is provided as requested.

I urge you to re-consider your proposals.

Yours sincerely

From:
Date: 12 June 2013 19:54:27
Posted At: VEHICLE AGE LIMITS
Conversation: Euro emission & vehicle age limits.
Subject: Euro emission & vehicle age limits.

I write with my deep concerns regarding the above subject, as you are aware there is a world wide recession even some of the European countries are in a serious financial mess and are asking for a bail out.

In Oxford unofficial deregulation has taken place. There are over seven hundred to one thousand hackney carriages and private hire cars working in Oxford. It seems that our licensing department have never been able to control illegal plying for hire since the days of Bill Scott, I say bring back Bill Scott, to make matters worse even out of town taxis and private hires are now running around and some times sitting around waiting to pick people when they have no right to.

It amazes me that once in a while when ever there is going to be an enforcement by the licensing department the private hires know this already.

The licensing department and the private hire bases make good money so they are not too bothered.

As regards to age limits surely the cars should not be considered in the same light as the purpose built and built to last London style taxis. I drive a London style taxi it is in a very good condition, most parts are bolted on and bolted off I have even changed the passenger seats, in my view as long as it passes the M.O.T it is deemed good for purpose. In any case our six monthly test are very stringent and of high standards and ensures that very high standards are maintained in cabs.

I believe there is no need to introduce age limits on taxis.

I have never claimed of the government.

I'm sure the last thing you want is every one to claim low income, income support, housing benefits etc. of government.

From:
Date: 11 June 2013 21:32:04
Posted At: VEHICLE AGE LIMITS
Conversation: Euro emissions & age limit
Subject: Euro emissions & age limit

The vehicles in oxford are in good repair and are safe for public use. The emissions on some cabs are great some not. To tackle it by brining in new vehicles is not the solution people should have a choice.

The new vehicles are not great for hackney carriages they carry a lot of faults and the engine does not last after, 150000 miles or they emissions ain't the good. To tackle emissions if vehicles are in bad conditions we can have 3 mots a year for older vehicles.

The maintenance cost of new hackneys is very expensive. The age limit if it is necessary I would say 20years. I don't think that is the solution.

Sent from my iPhone

From:
Date: 07 June 2013 10:11:55
Posted At: VEHICLE AGE LIMITS
Conversation: Euro Emissions & Vehicle Age Limits
Subject: Euro Emissions & Vehicle Age Limits

In response to your proposed changes I agree that the Council should have a plan to reduce emissions however putting an upper age limit of 5/8 years is unacceptable. Hackney carriages are work horses! designed to last, most if not all Hackneys in Oxford are in good if not excellent cosmetic condition/mechanical condition and as for the emissions produced by the cabs the current MOT is more than sufficient to monitor emissions and to remove any cabs from service that don't meet those requirements.

Expecting proprietors to spend anything up to £30,000 every 5/8 years replacing the cabs is not only unreasonable but is something that COLTA will undoubtedly challenge with the full backing of all proprietors.

As for suggestions as to how to reduce carbon emissions and improve vehicle safety I don't think any major changes are needed, the current MOT is more than sufficient to monitor Hackney Carriages for Emissions, Safety and Cosmetic looks.

Subject: FW: Euro Emissions & vechile a e limits
Date: 13 June 2013 21:06:47

-----Or

From: |

Posted

To: licensing@oxford.gov.uk

Posted To: licensing@oxford.gov.uk

Conversation: Euro Emissions & vechile age limits

Subject: Euro Emissions & vechile age limits

QUESTION 1 : YES

QUESTION 2 : NO

QUESTION 3 : YES

QUESTION 4 : THERE SHOULD BE NO UPPER AGE LIMIT OF 8 YEARS.

QUESTION 5 : AS LONG AS THE VECHILE PASSES THE COUNCIL'S OWN MOT THEN THE AGE OF THE VECHILE SHOULD NOT BE AN ISSUE.

From:
Date: 11 June 2013 20:31:21
Posted At: VEHICLE AGE LIMITS
Conversation: Taxi age limit
Subject: Taxi age limit

Hi,
There is no age limit of taxis anywhere in UK so why Oxford Taxi Licensing is thinking about this. As long as a taxi pass its MOT there should not be any problem. In my opinion there should not be any age limit of taxis. Thanks

Sent from Samsung Mobile

From:
Date: 12 June 2013 20:44:19
Posted At: VEHICLE AGE LIMITS
Conversation: Euro emission & age limits
Subject: Euro emission & age limits

As a owner of hackney carriage I write in response and of a concern to your letter dated 23rd April,2013.

Our standards in cabs I believe are higher than that of London.

We have M.O.T every six month to ensure that cabs are of the very high standards.

We have wheel chair accessible cabs.

We have swivel seat in our cabs.

We have built in step in our cabs.

We have built in child booster seat in our cabs.

We have five and six passenger carrier with ample luggage and leg room.

These London style taxis are built for this purpose and built to last therefore the minimum age limit on these cabs should be twenty (20) years or more.

From:
Posted At: 10 May 2013 14:47
Posted To: licensing@oxford.gov.uk
Conversation: Euro Emissions and Vehicle age limits
Subject: Euro Emissions and Vehicle age limits
Hi,

Reply to letter received.

1) I agree Oxford City council should take into consideration a plan to reduce carbon emissions and improve safety but then this should be something that applies to the whole of the UK not just Oxford.

2) I agree that Hackney carriages should have something done with regards to age limit because these vehicles are very heavy on emissions but with regards to private hire I think Oxford has a very good quality and to apply an 8 year rule from date of registration will cause an issue to drivers.

3) The 5 year from registration is fine.

4) The 8 year rule is not acceptable should increase to 10 years or if the 8 years goes ahead current drivers on the road should have the option to keep them up to 10 years as this is unfair. Or alter the time allowed dependent on the emissions as the new Toyota Prius from 08 plate and above are excellent obviously you are trying to achieve less emissions some of these models you don't have to pay tax as they are so efficient.

5) 5 Years from registration and 10 years from registration before they should be taken off the road is acceptable. As you will be fully aware the emissions of any vehicle up to 5 years are very good so in time this will reduce any emissions.

If you go ahead with the proposals I believe in my own personal opinion the Oxford Licensing department will lose huge revenue by drivers being forced to get licensed in another district that do not have the same rules.

From: _____
Date: 16 May 2013 15:58
Subject: Proposed Changes due to Emissions
To:
Cc:

Dear Sirs

Thank you for your letter in relation to the Euro Emissions and Vehicle Age Limits to Hackney and Private Hire Taxis.

I am writing to advise I strongly object to the proposed suggestions and raise my concerns below for both your points:

- a) With regard to new licences and the 3 year proposed limit, a 3 year old TX4 will have the same Euro Emissions as a 5 or 6 year old TX4 therefore this is unfair and unreasonable when an older vehicle can provide the same Emissions level. The limit should remain as it is.
- b) With regards to renewing licences, an 8 Year age limit is very unrealistic as there are several problems with this. This is highly unfair for people who have recently purchased a new vehicle who will have to replace this again in a shorter period of time. It is highly expensive to purchase a new taxi every 8 years taking depreciation into account and other factors into account. Also, with the high costs of Fuel and insurance being considered, it will be very difficult for most drivers to replace their vehicles resulting in people ending up without a job.

I hope you take my concerns into consideration and do not make the proposed changes.

Yours Faithfully

From:
Posted At: 09 May 2013 17:22
Posted To: licensing@oxford.gov.uk
Conversation: Euro Emissions & Vehicle Age Limits
Subject: Euro Emissions & Vehicle Age Limits

9th May 2013

Licensing Authority
Oxford City Council
Mr John Copley
3rd Floor, St Aldate's Chambers
Oxford, OX1 1DS

Dear Mr Copley,

Re: Euro Emissions & Vehicle Age Limits

I write with reference to the letter dated 23rd April 2013.

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

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.

It is evident that you have not taken into account the spiralling cost of fuel, insurance, road tax, council plate, badge, 2 compliance tests and regular ongoing maintenance costs.

I believe you are being hasty and unreasonable by pre-empting the final findings of the law commission and you have given no valid legitimate reasons for doing so.

In your consultation letter you have asked 5 questions and my response is as follows:

1. I have no problem with the Council having a plan to reduce carbon emissions and improve vehicle safety. However, I fail to understand how my vehicle and my colleague's vehicles are deemed unsuitable and unsafe if they are 8 years or over of age, when our taxi vehicles undergo stringent twice yearly compliance tests. Perhaps the council would like to explain this to me and other taxi drivers?

2. I strongly disagree with your assertion that carbon emissions can be reduced and vehicle safety can be improved by imposing an upper age limit on Hackney carriages and Private Hire Vehicles.

I copy a quote from DFT Taxi and Private Hire Vehicle Licensing: Best Practice Guide; Para 32

“AGE LIMITS. It is perfectly possible for an older vehicle to be in good condition. So setting of an age limit beyond which a local authority will not license vehicles may be arbitrary and inappropriate. But a greater frequency of testing may be appropriate for older vehicles – for example twice – yearly tests for vehicles over 5 years old”

3. I have no objections for an upper age limit of “under 5 years of age” for any vehicle submitted for a new licence.

4. I strongly disagree with the proposal for an upper age limit of “under 8 years of age” for any vehicle submitted for a renewal of an existing licence. See my reply to No’s 1 and 2.

5. I refer you to my reply to No’s 1 and 2. Perhaps the council should consider targeting the real gas guzzlers that are causing emissions problems in Oxford and stop discriminating against the Taxi business who are subjected to stringent twice yearly compliance tests. I am referring to buses and coaches.

I take strong issue with paragraph 2 of the letter dated 23.04.2013. It is an established fact that Oxford is a world class city due to its history and reputation. I would like to understand how its status will be further enhanced by imposing arbitrary age limits on taxis operating in Oxford.

I would like the council to present evidence of how the quality of vehicle safety offered to the public has been in any way compromised by taxi vehicles that are 8 years or over of age to come to an arbitrary 8 year age cut off point. I am open to persuasion if compelling evidence is provided as requested.

I urge you to re-consider your proposals.

Yours sincerely

From:|
Posted At: 03 May 2013 21:50
Posted To: licensing@oxford.gov.uk
Conversation: Consultation
Subject: Fwd: Consultation

Licensing Authority
Oxford City Council
Mr John Copley
3rd Floor, St Aldate's Chambers
Oxford, OX1 1DS

Dear Mr Copley,

Re: Euro Emissions & Vehicle Age Limits

I write with reference to the letter dated 23rd April 2013.

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

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.

It is evident that you have not taken into account the spiralling cost of fuel, insurance, road tax, council plate, badge, 2 compliance tests and regular ongoing maintenance costs.

I believe you are being hasty and unreasonable by pre-empting the final findings of the law commission and you have given no valid legitimate reasons for doing so.

In your consultation letter you have asked 5 questions and my response is as follows:

1.

I have no problem with the Council having a plan to reduce carbon emissions and improve vehicle safety. However, I fail to understand how my vehicle and my colleague's vehicles

are deemed unsuitable and unsafe if they are 8 years or over of age, when our taxi vehicles undergo stringent twice yearly compliance tests. Perhaps the council would like to explain this to me and other taxi drivers?

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3.

I have no objections for an upper age limit of “under 5 years of age” for any vehicle submitted for a new licence.

4.

I strongly disagree with the proposal for an upper age limit of “under 8 years of age” for any vehicle submitted for a renewal of an existing licence. See my reply to No’s 1 and 2.

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I refer you to my reply to No’s 1 and 2. Perhaps the council should consider targeting the real gas guzzlers that are causing emissions problems in Oxford and stop discriminating against the Taxi business who are subjected to stringent twice yearly compliance tests. I am referring to buses and coaches.

I take strong issue with paragraph 2 of the letter dated 23.04.2013. It is an established fact that Oxford is a world class city due to its history and reputation. I would like to understand how its status will be further enhanced by imposing arbitrary age limits on taxis operating in Oxford.

I would like the council to present evidence of how the quality of vehicle safety offered to the public has been in any way compromised by taxi vehicles that are 8 years or over of age to come to an arbitrary 8 year age cut off point. I am open to persuasion if compelling evidence is provided as requested.

I urge you to re-consider your proposals.

Yours sincerely

Sent from my iPhone

From:
Posted At: 29 May 2013 20:52
Posted To: licensing@oxford.gov.uk
Conversation: Euro Emissions & Vehicle Age Limits
Subject: Euro Emissions & Vehicle Age Limits
Dear Taxi Licensing Authority,

Re:

We do not agree with the age limits on the vehicle, as it is not viable to buy a new Hackney Cab every eight years, they are very expensive it takes us five years to pay the hire purchase off.

I completely understand the purpose behind this but it just isnt viable.

Many Thanks

From:

Posted At: 06 June 2015 23:16

Posted To: licensing@oxford.gov.uk

Conversation: HACKNEY CARRIAGE & PRIVATE HIRE: CONSULTATION

Subject: RE:HACKNEY CARRIAGE & PRIVATE HIRE: CONSULTATION

Ref: Taxi Licensing

Dear Sirs/Madams

I am emailing you with regards to the Vehicle age limits. I am a Hackney Carriage driver, and would like to suggest that the limit for a hackney carriage licence should be at least 15 years for the below reasons:

1. A Hackney costs £40,000 (hence it is unfair to compare it to a private hire vehicle, as they only cost around £10,000-£12,000, which is 3 times less than the price of a Hackney).
2. We have to go through 2 MOT tests within a year, so Hackney's are mostly up to date in meeting the required standards.

In order to make sure all Hackneys are meeting the required standards you should do spot checks more often. And those that are not up to their standards should be taken off road / suspended until they meet the standards.

On average the weekly maintenance costs for a Hackney is £250-£300, which is very hard to manage especially in this financial climate/recession, and also business is currently down by 30%. I hope you will take the above points into your consideration, so we could come to a agreement. I look forward to hearing from you soon. Many thanks.

Best Regards

From

Posted At: 28 April 2013 10:44

Posted To: licensing@oxford.gov.uk

Conversation: Euro Emissions @ Vehicle Age Limits

Subject: Euro Emissions @ Vehicle Age Limits

i agree with your proposals for the upper age limit of under 5 years for any vehicle submitted for a new licence and also the upper age limit of under 8 years for vehicle submitted for a renewal of an existing license i think the it would be good for keeping the carbon emissions at a lower level and also for keeping the taxis and private hire in a more up to date condition for the general public to travel in safety and comfort thank you

From:

Posted At: 15 May 2013 12:48

Posted To: licensing@oxford.gov.uk

Conversation: EURO Emissions & Vehicle Age Limits

Subject: EURO Emissions & Vehicle Age Limits

Subject: EURO Emissions & Vehicle Age Limits

Please find my response to the hackney carriage & private hire consultation and thank you for allowing me the opportunity to respond.

1. I do agree that Oxford City Council should have a plan to reduce carbon emissions and improve vehicle safety.
2. I do not think that adding these age limits will improve vehicle safety and reduce carbon emissions.
3. I do not agree with the proposal for an upper age limit of “under 5 years of age” for any vehicle submitted for a new licence.
4. I do not agree with the proposals for an upper age limit of “under 8 years of age” for any vehicle submitted for the renewal of an existing licence.
5. In principle I am not against an age limit for vehicles as per the proposal but do not think it should be as proposed. For example the upper age limit for the renewal of an existing license should be under 14 years rather than under 8 years.

In addition to this the TX4 model of the London Taxi has brought further improvements during the years to the London taxi. The VM Motori diesel engine meets the Euro IV emission standard which means a much improved environmental performance. ABS brakes provide increased safety, while the passengers benefit from reduced noise levels.

There are a number of other refinements, such as improved ventilation (with the option of air conditioning), improved intercom system and an interior redesign to give a lighter, brighter ambience.

Therefore by having an existing model you are likely to conform to high standards of vehicle safety and have an environment friendly vehicle.

I take pride in my taxi and make sure it is maintained upto a high standard both in terms of vehicle safety, the environment and my customers. If there are taxi's not upto certain standards maybe they should be targeted by the City Council (e.g. spot checks) rather than general proposals which are costly for taxi drivers.

From:
Posted At: 30 April 2013 12:08
Posted To: licensing@oxford.gov.uk
Conversation: Taxi Age Limit
Subject: Taxi Age Limit

I will keep this brief as I am sure that you will have many hundreds of letters to consider. I personally as a driver am against the proposal. Although The EU are forcing you to reduce emissions in line with their own policy (which again I disagree with, and hopefully the government is not lying to us this time and give us our referendum so that we can pull out of the EU and be free of all these loony schemes, but that is for another day) in point 1 I fail to see how the OCC plan would improve vehicle safety because the TX1 which you wish to ban from the roads is a far better built and sturdier vehicle than the TX4 that you favour, and as such offers better safety for the passenger and driver. point 2 No. Point 3 Yes. Point 4 No. Point 5. A simple answer for the Carfax area, which is the main cause of pollution in The City Centre, would be to remove the loading bays along the North side of High Street, and to move the bus dropping off points further East away from Carfax, this would alleviate the all day long traffic jams caused by the 2 above very badly designed bays. The longer action needed is for the London and Airport buses to be routed either North or South from Gloucester Green, and NOT down the High Street which has already suffered enormous damage caused by the weight of The Oxford Tube, and fully laded airport buses only a few years after £millions was spent rebuilding the road. In Queen Street a new bus stop is needed East of Bonn Square to take away the pressure on St Aldates which now resembles Cornmarket Street of old with buses blocking the road all day and sometimes all night long. Their are very few Black Cab movements through Carfax as we use the North or South routes to avoid the congestion. Now to the Taxi Trade. The entire world looks up to the London Taxi Trade as the model that all licensing authorities aspire to. But as usual Oxford has to be different and be the guinea Pig for all Harebrained schemes, from the Rubber Road in Cornmarket Street in the 50s right up to the modern day, with cornmarket voted 2nd worst street in Britain, my point being that it seems that all decisions made solely by O.C.C. are not only wrong but financially lead to bankruptcy. I feel that the London Model should be followed, where you can still find FX'S on the road. The main challenge to your proposal (and maybe a costly legal one) will come from your decision to grant The L.T.C. a monopoly on Taxi sales in Oxford. Their vehicle is the most unreliable on the road, having had recalls, and an awful record in Oxford for the proprietors forced to buy one, not to mention the financial problems of the parent company. You will need to licence the Mercedes as well if you were to bring in an age limit. As you know it is good enough for London, so should be good enough for the rest of the World let alone Oxford. One last thing for you to contemplate, the Multi-national bus companies that clog up our streets get subsidies to buy their buses, subsidies to run certain services, and are just implementing their 7th fare increase in just over 5 years. The Taxi trade enjoys none of the above privileges, and also over the last 3 years until last month had only had 1 fare increase of 1.5% on a £10 journey, whilst having to suffer a near 50% rise in fuel costs. If your proposal is implemented you will be looking at another 10% rise in fares to cover the £140 a week loan repayments on a new cab. And my last gripe is aimed directly at licensing who provide only 14 working rank spaces for 107 licensed taxis. I.E. Gloucester Green. The ranks at St Giles and The High Street are useless as people will not walk to them and instead flag down a cab either by Waterstones or Carfax. You need to provide a daytime rank in Broad Street in the space currently occupied by the Tour Bus sales booth, and make Carfax at 24 Hour Rank, it works perfectly well on a Sunday, so what is your objection to a 24/7 rank?. I hope you take these points on board, as you are not likely to get anything as constructive from the COLTA secretary who is about as much use as an ashtray on a motorbike, but he makes your life easier.

From:
Posted At: 02 May 2013 19:34
Posted To: licensing@oxford.gov.uk
Conversation: Taxi Licensing
Subject: ref: Taxi Licensing
To John Copley

In reply to your letter sent to me i would like to point say that i do not agree with reducing the age limit of taxis to 5 years. i feel it should be 15. As our vehicles have 2 MOT every year to ensure they are safe, as part of those MOTs emissions and the general look of the vehicle is apart of the test. so as long as we are passing it shouldn't be a issue. however i understand you would like the vehicles to look presentable which is why i recommend a 15 year age limit as i feel there is no reason a 14 year old vehicle can still well presentable and if there are any issues in its looks or emissions efficacy this will be flagged up in the MOT.

kind regards

From:
Posted At: 11 June 2013 22:00
Conversation: Euro Emissions&Vehicle Age Limits
Posted To: VEHICLE AGE LIMITS

Subject: Euro Emissions&Vehicle Age Limits

Dear Sir madam

First of all thank you very much for asking my point of view on euro emission & vehicle age limits. I agree with the proposals for an upper age limit of " under 5 years of age". But i disagree with the proposals for an upper age limit " under 8 years of age" if it is possible please could you keep 10 year limit because it difficult to save money to buy another taxi in three years.

Some cars come from other city councils but there cars are very old and they work with same city, same company, how could you improve to reduce carbon in oxford. I know some local taxi drivers even when the oxford city council stop to renew their vehicle these driver then take there taxis to other city council to renew there taxi plates and start to work back in oxford again. I am advising you to leave the age limit to 10 years. please try stop other city council drivers working back in oxford.If oxford city council don't take any action then oxford city workers will join other city councils to get vehicle plates and work back in oxford.

thank you for taking your time for reading this.

From:
Posted At: 12 June 2013 12:08
Posted To: licensing@oxford.gov.uk
Conversation: 2013 Oxford City Council Hackney Consultation
Subject: 2013 Oxford City Council Hackney Consultation
Date 12.06.2013

Dear Sir/Madam

I have read your letter regarding the consultation letter on the Age Limit and Euro Emission on Hackney Carriages.

I myself disagree with the whole proposals because this age limit would put a big effect on me in buying a new cab which cost £40000

Or by me to arrange for a loan which i believe would financially make it unworkable.

Then to claim or make the money back would mean meter fare price would have to go up again.

Already its unfair because cost have gone up in every section.

So i am not happy at all.

I would like to discuss a plan to reduce Carbon Emission because i feel and for others around me to breathe fresh air.

And for the Safety issue i would say there is not much we can change

Yours Sincerely

Sent from my Samsung Galaxy Note II LTE on Three

From:
Posted At: 29 April 2013 17:11
Posted To: licensing@oxford.gov.uk
Conversation: Cab age
Subject: Cab age

I am writing to you in regards to the age limit of taxis. I believe as far as the vehicles are up to standard engine wise and body wise or otherwise the cabs should not have to be changed. The council has a great team of M.O.T. staff which also goes along with the M.O.T. of taxis twice a year to make sure the taxis are up to date, so with this in place i believe there should not be an age limit on taxis as we are or remain up to date with vehicles.

Thank you and regards

Sent from my iPhone

From:|
Posted At: 12 June 2013 08:50
Posted To: licensing@oxford.gov.uk
Conversation: Consul
Subject: Consultation

Dear Sir/Madam

Further to the above Consultation, my response is, as follows:-

1. Yes, I agree to the reduction of emissions, but believe the existing safety criteria is sufficient.
2. Yes, I agree the upper age limit should be capped, but only in consultation with the drivers on a voting basis.
3. No, I do not agree to the upper age limit of 5 years. Any proposals should be done by a vote of the current license holders.
4. No, I do not agree with the upper age limit of 8 years for renewal, I believe it should be between 10-15 years.
5. The council should part subsidise any exhaust changes to enable vehicles to be compliant with Euro emissions. Also, the current thorough process of MOT testing is sufficient to ensure vehicle safety.

Regards,

From:
Posted At: 12 June 2013 13:42
Posted To: licensing@oxford.gov.uk
Conversation: euro emissions and vehicle age limits
Subject: euro emissions and vehicle age limits

Licensing Authority,

I am responding to the letter I received dated 23/04/2013 with regards to the consultation on emissions and vehicle age limits for hackney carriage and private hire vehicles.

I do not agree with the proposals put forward by the head of environmental development for climate change mitigation. I believe that the proposals are a knee jerk reaction and do not believe that they have been properly thought through as to how much difference they would make. Some stats to show what difference these proposals would make would have been appreciated.

At the moment hackney carriage vehicles go through a very stringent MOT every six months. Very close detail is paid to conditions of vehicle including mechanical, interior and exterior to make sure vehicles are in good condition and appearance to represent Oxford city gracefully. I disagree that the upper age limits of 5 and 8 years would improve vehicle safety because the current set up is more than adequate to make sure the vehicles are upholding the safety of the travelling public well.

At the moment there are older vehicles in service in London (the top destination for tourists in 2012, ref conde nast traveller) representing the borough well.

And what about the financial implication to the licence holders in the current financial climate, which I believe has not been thought through at all when the proposal suggests that the changes should be brought in from Jan 2014- approximately 5 to 6 months after the end of consultation. For your information a 5 year old LTI costs in the region of £15 to £20000. How would a licence holder look to finance for this amount in the current climate when banks are not lending so openly. In such a short period of time a licence holder may have to look elsewhere for employment.

Therefore, I disagree with these proposals in current form and believe they have not been thought through properly taking all aspects into consideration.

I would suggest;

- : making more roads traffic free

- : reduce busses on the road at certain times of the day. I have lost count of the number of busses I see on a daily basis that are travelling with only a few passengers on board. There are so many busses about at off peak times that the congestion they cause and ultimately how much pollution they cause from vehicles that are jammed up behind them. The roads in Oxford are narrower than in some towns because of which we have so much congestion. Maybe we need to look at parking bays for busses cut into the pavements to keep other traffic flowing.

- : When a new vehicle is licenced, Only allow vehicles to be licenced under certain engine size. The trend from manufacturers is to reduce the engine capacity of their vehicles to bring down their emissions.

- : put a ceiling on maximum CO2 PER G/KM for vehicles to emit, encouraging licence holders to bring in cleaner vehicles when replacing their vehicles.

- : LTI vehicles (ie black cabs) do not have the most efficient vehicles on the market in terms of CO2 or fuel efficiency. Why not allow Lti vehicles to be

replaced by passenger cars to be hackney carriage licensed vehicles. That would significantly reduce the carbon footprint.

:put a ceiling on maximum number of private hire vehicle licences.

:Educate all vehicle users on how to use their vehicles more efficiently, therefore reducing emissions and improving economy of their vehicles.

:Any proposal should give a good notice of time. I would suggest 2 to 4 years depending on the proposal. This would then give everybody a good opportunity to evaluate their own circumstances and make their decision.

I hope my views are taken in to consideration when making any changes.

Kind regards.

From:|
Posted At: 29 May 2013 10:48
Posted To: licensing@oxford.gov.uk
Conversation: Hackney Carriage & Private Hire: Consultation
Subject: RE: Hackney Carriage & Private Hire: Consultation

To Whom It May Concern,

I am writing to discuss my views on the 'Euro emissions & vehicle age limit' consultation. I, as a Hackney driver of 24 years, strongly disagree with the proposals listed. I believe that the proposals are ill thought and are detrimental to the livelihoods of hundreds of drivers across Oxfordshire.

The following are my views on the proposals suggested;

New Vehicle Licence:

From 1st January 2014 a licence will not be granted if the vehicle is 5 years or of age or more from the date of its first registration.

Renewal of Vehicle Licence:

From 1st January 2014 no licence will be renewed if the vehicle is 8 years of age or more from the date of its first registration.

These proposals will mean that me, and hundreds of other drivers, will have to spend a circa £40, 000, every 8 years, in order to gain a licence to earn our livelihoods; after paying the 5 year loan the total will be around £47,000. This money will come from our own pockets and will reduce our living standards. Will the Council help us in purchasing our vehicles through subsidies? I probably don't think so because it would be unfair on the tax payer. Bus companies can pay to introduce new buses because they are one business therefore can use their size to negotiate better rates of price whereas our taxis are bought by individuals thus reducing our bargaining power. This will also lead to a glut of working, and in good order, taxis on the second hand marketing leading to a loss of value when it comes to the point of sale after 8 years.

Work for us driver has already gone down because of cross border Private Hire working in Oxford pinching our trade; our enforcement team is not doing enough because these cars are increasing in number each day.

Financially it will make sense for us Hackney drivers to purchase Private Hire vehicles as they tend to be cheaper (about £15,000 v £40,000) This will mean that Oxford will lose an iconic vehicle. A city as iconic as Oxford deserves a Hackney Taxi.

Another point I want to make is regards to carbon emissions. Our taxis are MOT'd every 6 months and are subjected to strict emission tests, already, therefore the fleet of taxis are in good working conditions. Surely emission costs of building a brand new taxi outweigh the emission cost of running a taxi older than 8 years? It is unfair to just look at the emissions when the taxis are working but the entire life emission of the taxis should be considered; and in that sense these proposals make absolute no sense and stink of proposals for the sake of proposals.

My final point is Oxford is a small city compared to London, Manchester,

Glasgow etc, those cities have a much larger taxi fleet but their taxis wouldn't be subjected to such strict emissions controls then why should ours be? Surely action must be taken in larger cities before it is stemmed down to smaller cities like ours?

In conclusion these proposals are ill thought and will strike the very livelihoods of a hundred drivers and hundreds of families depending upon them. Our taxis are already tested, twice a year, against strict emissions tests and most tend to pass so why have these emissions rules now? Also one must look at the entire emissions life span of a taxi, from manufacture to disposal and not just the emissions that come from the exhaust pipe; and in that sense these proposals are in complete contradiction to your aims behind them.

Regards

From:

Posted At: 28 May 2013 12:28

Posted To: licensing@oxford.gov.uk

Conversation: Taxi licensing

Subject: Taxi licensing

1) Do you agree or disagree that Oxford city council should have plan to reduce carbon emissions and improve vehicle safety.....Agree

2) Do you agree or disagree that this can be achieved by putting an upper age limit on hackney carriages and private hire vehicles? Disagree

3) Do you agree or disagree with the proposals for an upper age limit of "under 5 years of age" for any vehicle submitted for new licence? Agree

5) Do you agree or disagree with the proposals for an upper age limit of "under 8 years of age" for any vehicle submitted for the renewal of an existing licence? Disagree

6) 5) If you disagree with these proposals, Please let us know how you would suggest we achieve our carbon emissions reduction and improvements in vehicle safety..

P.S Sorry to say this but the way things are going in the business not many people will be able to afford all these expenses.

All I can say is if vehicle owner maintain the vehicle I don't see the need to keep changing them, I'm sure you have read about what is going with LTI. So how will the owner of LTI cab be able to keep changing from old to new???

From:
Posted At: 07 May 2013 19:35
Posted To: licensing@oxford.gov.uk

Conversation: Totally disagree because tx1 have better cleaner emissions than tx4s and there's not enough business too fork out forty thousand pounds every eight years
Subject: Totally disagree because tx1 have better cleaner emissions than tx4s and there's not enough business too fork out forty thousand pounds every eight years

Sent from my iPhone

Subject: FW: HACKNEY CARRIAGE & PRIVATE HIRE: CONSULTATION
Date: 07 June 2013 08:22:02

From:
Posted At: 06 June 2013 23:16
Posted To: licensing@oxford.gov.uk
Conversation: HACKNEY CARRIAGE & PRIVATE HIRE: CONSULTATION
Subject: RE:HACKNEY CARRIAGE & PRIVATE HIRE: CONSULTATION

Ref: Taxi Licensing

Dear Sirs/Madams

I am emailing you with regards to the Vehicle age limits. I am a Hackney Carriage driver, and would like to suggest that the limit for a hackney carriage licence should be at least 15 years for the below reasons:

1. A Hackney costs £40,000 (hence it is unfair to compare it to a private hire vehicle, as they only cost around £10,000-£12,000, which is 3 times less than the price of a Hackney).
2. We have to go through 2 MOT tests within a year, so Hackney's are mostly up to date in meeting the required standards.

In order to make sure all Hackneys are meeting the required standards you should do spot checks more often. And those that are not up to their standards should be taken off road / suspended until they meet the standards.

On average the weekly maintenance costs for a Hackney is £250-£300, which is very hard to manage especially in this financial climate/recession, and also business is currently down by 30%. I hope you will take the above points into your consideration, so we could come to a agreement. I look forward to hearing from you soon. Many thanks.

Best Regards

From:
Posted At: 11 June 2013 22:30
Conversation: Hackney Carriage & Private Hire vehicle 2013 Consultation Oxford City Council
Posted To: VEHICLE AGE LIMITS

Subject: Hackney Carriage & Private Hire vehicle 2013 Consultation Oxford City Council

Date 11.06.2013

Dear Sir/Madam

I have read your letter that the General Purposes Licensing Committee has requested that the Head of Environmental Development carry out this Hackney Carriage & Private Hire Vehicle Consultation in the Summer of 2013.

I would like to make my views known regarding the Hackney Carriages Consultation and on the following Euro Emission & Age Limits.

With the New Vehicle Licence I agree that the vehicle should not be more than 5 years old because that's what we're doing at the moment.

The Renewal Of The Vehicle License I would Disagree because we feel there should not be an age limit set.

I would Agree if there could be a plan to reduce Carbon Emissions and Improve Vehicle Safety By having inner comfort areas of the vehicle more improved on and by looking at Catalytic Converter Systems or another type of alternative idea rather than an age limit set on the Hackney Carriage Vehicles.

I would Disagree because this can not be achieved by putting an upper age limit on Hackney Carriages nor it will achieve a limit of under age of 8 years.

I could Agree with a proposal if we really need an age limit of such vehicle that would submit a vehicle license to be renewed for an existing license.

Oxford city and its council authorities have the best system in place already for these public services vehicles for they Safety check and Emission Tests. Which these public service vehicle are meeting the Standard Set.

We feel our Oxford City Council Authorities have improved more on Vehicle Safety and on Road Safety than any other Big City In The UK.

Financially we believe in business wise the Proposals put forward by the General Purposes Licensing Committee to request that the Head Of Environmental Development have a look in to is Unworkable and unaffordable.

We have agreed and disagreed on some question because we feel we and the local council authorities need to look at the long term effects and the wider picture on where the Taxi Trade is going at the Moment and its future coming.

Yours Sincerely

Sent from my iPad

30-09-13

Dear Sir

I am writing to you regarding the age limit and Euro emissions exercise. It would be very damaging if this goes to fruition. My our taxis are MOT'd twice a year and the emission test are passed as well as the taxis's are keep in excellent condition. Business has also dropped due to the recession we are in. Other cities such as London and Reading have to change their taxis every 20 years, I feel this standard should also be applied to us in the city of Oxford as well.

The cost of a taxi is between £35 000 to £40 000 so changing a taxi every 5 or 8 years would have a serious affect on our lively hood.

I urge the council to help us oppose this proposal and set a 20 year limit like other cities.

In Summary

I agree that carbon emissions should be reduced using a cost affective strategy

I disagree that an upper age limit on hackney carriages and private hire vehicles will help this (reasons stated above)

I disagree for an upper age limit of “under 5 years” for new licence

I disagree for an upper age limit of “under 8 years of age” for renewal existing licence.

I disagree with both proposals as this will question the viability of the taxi business in Oxford, Also the proposal does not offer a subsidy to assist the proposal as it has with bus companies in Oxford which is unfair.

Regards

From:
Posted At: 05 June 2013 05:51
Posted To: licensing@oxford.gov.uk
Conversation: Age limit
Subject: Age limit

Dear sir/madam

I am writing to you to request an age limit should not be put on taxis as this would put great burden on many taxi drivers and the cost of running these taxis are very expensive as it is.

Thank you

Sent from my iPhone

From: www-data [mailto:www-data@occ2.oxil.co.uk] Posted At: 04 June 2013 12:51
Posted To: licensing@oxford.gov.uk
Conversation: Contact Via Website
Subject: Contact Via Website

You have received a contact message from the Oxford City Council Website as follows:

Address:

Telephone N _____

Comments: Regarding age limit off Hackney carriages. I would like to put my point of view by saying a 15 year age limit should be implented. In london this has been implemented with no problems. As long as the cab is capable of passing mot every 6months then there shouldn't be an issue. We as a family have spent £27000 on a new cab and the only way for us to make most off the vehicle financially would be to put a 15 year age limit on the Hackney carriage.

Customer reference number: Hackney carriage age limit

From:
Posted At: 07 May 2013 18:03
Posted To: licensing@oxford.gov.uk
Conversation:
Subject:
To whom this may concern,

Upon reading your letter to introduce a New Vehicle Age Limit I have considered it not to be such a good decision, I agree that the Oxford City Council should take up a sense of responsibility trying to reduce the carbon emission but this new idea proposed will be extremely costly and much of a burden for us taxi drivers as currently work levels have reduced massively.

Taxis go through MOT every 6 months to check the suitability for the roads and for the public and this increases road safety. I have also noticed the newer generation of taxi makes are causing more mechanical problems and are becoming increasingly expensive to run.

The age of the taxi should not be something that needs to be looked on as a problem to be changed. In London you see Taxis of ages more than 20 and this is evidence that older vehicles are safe to drive. I agree that carbon emission is an on going problem for the world but if this decision is carried out it will cause much stress and financial burden on the taxi drivers.

I hope you can consider my view point and will be looking forward to see what action you take,

yours sincerely,

From:
Posted At: 28 May 2013 12:28
Posted To: licensing@oxford.gov.uk
Conversation: Taxi licensing
Subject: Taxi licensing

- 1) Do you agree or disagree that Oxford city council should have plan to reduce carbon emissions and improve vehicle safety.....Agree
- 2) Do you agree or disagree that this can be achieved by putting an upper age limit on hackney carriages and private hire vehicles? Disagree
- 3) Do you agree or disagree with the proposals for "an upper age limit of" under 5 years of age" for any vehicle submitted for new licence? Agree
- 5) Do you agree or disagree with the proposals for "an upper age limit of" under 8 years of age" for any vehicle submitted for the renewal of an existing licence? Disagree
- 6) 5) If you disagree with these proposals, Please let us know how you would suggest we achieve our carbon emissions reduction and improvements in vehicle safety..

P.S Sorry to say this but the way things are going in the business not many people will be able to afford all these expenses.

All I can say is if vehicle owner maintain the vehicle I don't see the need to keep changing them, I'm sure you have read about what is going with LTI. So how will the owner of lti cab be able to keep changing from old to new???

From
21:43 Posted To: licensing@oxford.gov.uk
Conversation: Consultation
Subject: Consultation

Posted At: 07 May 2013

1. I agree when the O.C.C modernization plan includes swap of classic PHVs for hybrid ones.
2. I disagree.
3. I disagree.
4. I disagree.
5. By introducing more hybrid vehicles as PHVs, cancellation for instance: road signs of obligatory turn in only one direction for PHVs and Hackney Carriages, all PHVs and HCs should be provided with codes enabling to cross over hydraulic road blocks, focusing attention on swap of all fashioned buses on hybrid ones, traffic lights modernization to introduce new ones provided with approaching sensors.

Posted At: 03 June 2013 19:40

Posted To: licensing@oxford.gov.uk

Conversation: EURO EMISSIONS & VEHICLE AGE LIMITS

Subject: EURO EMISSIONS & VEHICLE AGE LIMITS

1. I disagree

2. I disagree

3. I disagree

4. I disagree - There should be an age limit of 15 years for any vehicle submitted for a new license.

5. At the moment economic climate is not good therefore people are struggling with finances and people like myself are unable to afford new vehicles which cost around £35,000.

Concerning vehicle safety there is already 6 months MOT service in place, therefore there will any issues will be picked up in this.

Oxford is a small city and has limited business for taxi drivers as the busy days are only Friday's and Saturdays. Also many of the bus services are now 24 hours.

From:
Posted At: 02 May 2013 23:03
Posted To: licensing@oxford.gov.uk
Conversation: Consultation
Subject: Consultation

Licensing Authority
Oxford City Council
Mr John Copley
3rd Floor, St Aldate's Chambers
Oxford, OX1 1DS

Dear Mr Copley,

Re: Euro Emissions & Vehicle Age Limits

I write with reference to the letter dated 23rd April 2013.

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

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.

It is evident that you have not taken into account the spiralling cost of fuel, insurance, road tax, council plate, badge, 2 compliance tests and regular ongoing maintenance costs.

I believe you are being hasty and unreasonable by pre-empting the final findings of the law commission and you have given no valid legitimate reasons for doing so.

In your consultation letter you have asked 5 questions and my response is as follows:

1.

I have no problem with the Council having a plan to reduce carbon emissions and improve vehicle safety. However, I fail to understand how my vehicle and my colleague's vehicles are deemed unsuitable and unsafe if they are 8 years or over of age, when our taxi vehicles undergo stringent twice yearly compliance tests. Perhaps the council would like to explain this to me and other taxi drivers?

2.

I strongly disagree with your assertion that carbon emissions can be reduced and vehicle safety can be improved by imposing an upper age limit on Hackney carriages and Private Hire Vehicles.

I copy a quote from DFT Taxi and Private Hire Vehicle Licensing: Best Practice Guide; Para 32

“AGE LIMITS. It is perfectly possible for an older vehicle to be in good condition. So setting of an age limit beyond which a local authority will not license vehicles may be arbitrary and inappropriate. But a greater frequency of testing may be appropriate for older vehicles – for example twice – yearly tests for vehicles over 5 years old”

3.

I have no objections for an upper age limit of “under 5 years of age” for any vehicle submitted for a new licence.

4.

I strongly disagree with the proposal for an upper age limit of “under 8 years of age” for any vehicle submitted for a renewal of an existing licence. See my reply to No’s 1 and 2.

5.

I refer you to my reply to No’s 1 and 2. Perhaps the council should consider targeting the real gas guzzlers that are causing emissions problems in Oxford and stop discriminating against the Taxi business who are subjected to stringent twice yearly compliance tests. I am referring to buses and coaches.

I take strong issue with paragraph 2 of the letter dated 23.04.2013. It is an established fact that Oxford is a world class city due to its history and reputation. I would like to understand how its status will be further enhanced by imposing arbitrary age limits on taxis operating in Oxford.

I would like the council to present evidence of how the quality of vehicle safety offered to the public has been in any way compromised by taxi vehicles that are 8 years or over of age to come to an arbitrary 8 year age cut off point. I am open to persuasion if compelling evidence is provided as requested.

I urge you to re-consider your proposals.

Yours sincerely

From:
Posted At: 15 May 2013 15:11
Posted To: licensing@oxford.gov.uk
Conversation: consultation
Subject: consultation

dear john copley,

we have already reduced business cause plenty of taxi drivers, operator and honestly you guys making lot of money, i am sure you will forgive me for this, for the subjected matter i simply dis agree.

manv thanks

From:
Posted To: licensing@oxford.gov.uk
Conversation: Contact Via Website
Subject: Contact Via Website

Posted At: 26 April 2013 12:34

You have received a contact message from the Oxford City Council Website as follows:

Comments: Hi my plate I think age limit should be 10 year if age limit is 8 year
than u have change car every three years That will be that will be not easy Thanks.

Customer reference number:

From:
Posted At: 29 May 2013 10:48
Posted To: licensing@oxford.gov.uk
Conversation: Hackney Carriage & Private Hire: Consultation
Subject: RE: Hackney Carriage & Private Hire: Consultation

To Whom It May Concern,

I am writing to discuss my views on the 'Euro emissions & vehicle age limit' consultation. I, as a Hackney driver of 24 years, strongly disagree with the proposals listed. I believe that the proposals are ill thought and are detrimental to the livelihoods of hundreds of drivers across Oxfordshire.

The following are my views on the proposals suggested;

New Vehicle Licence:

From 1st January 2014 a licence will not be granted if the vehicle is 5 years or of age or more from the date of its first registration.

Renewal of Vehicle Licence:

From 1st January 2014 no licence will be renewed if the vehicle is 8 years of age or more from the date of its first registration.

These proposals will mean that me, and hundreds of other drivers, will have to spend a circa £40, 000, every 8 years, in order to gain a licence to earn our livelihoods; after paying the 5 year loan the total will be around £47,000. This money will come from our own pockets and will reduce our living standards. Will the Council help us in purchasing our vehicles through subsidies? I probably don't think so because it would be unfair on the tax payer. Bus companies can pay to introduce new buses because they are one business therefore can use their size to negotiate better rates of price whereas our taxis are bought by individuals thus reducing our bargaining power. This will also lead to a glut of working, and in good order, taxis on the second hand marketing leading to a loss of value when it comes to the point of sale after 8 years.

Work for us driver has already gone down because of cross border Private Hire working in Oxford pinching our trade; our enforcement team is not doing enough because these cars are increasing in number each day.

Financially it will make sense for us Hackney drivers to purchase Private Hire vehicles as they tend to be cheaper (about £15,000 v £40,000) This will mean that Oxford will lose an iconic vehicle. A city as iconic as Oxford deserves a Hackney Taxi.

Another point I want to make is regards to carbon emissions. Our taxis are MOT'd every 6 months and are subjected to strict emission tests, already, therefore the fleet of taxis are in good working conditions. Surely emission costs of building a brand new taxi outweigh the emission cost of running a taxi older than 8 years? It is unfair to just look at the emissions when the taxis are working but the entire life emission of the taxis should be considered; and in that sense these proposals make absolute no sense and stink of proposals for the sake of proposals.

My final point is Oxford is a small city compared to London, Manchester,

Glasgow etc, those cities have a much larger taxi fleet but their taxis wouldn't be subjected to such strict emissions controls then why should ours be? Surely action must be taken in larger cities before it is stemmed down to smaller cities like ours?

In conclusion these proposals are ill thought and will strike the very livelihoods of a hundred drivers and hundreds of families depending upon them. Our taxis are already tested, twice a year, against strict emissions tests and most tend to pass so why have these emissions rules now? Also one must look at the entire emissions life span of a taxi, from manufacture to disposal and not just the emissions that come from the exhaust pipe; and in that sense these proposals are in complete contradiction to your aims behind them.

Regards

To the Head of Environmental Development
Oxford City Council
Oxford

Thursday 6th June 2013

RE: Euro Emissions & Vehicle age limits

Dear Sir,

In response to your letter regarding consultation for Hackney Carriage & Vehicles.
My opinion is as follows:

- 1) I believe there should be a national policy in place to reduce CO2 emissions and improve vehicle safety. This policy should apply to all vehicles nationwide.
- 2) I disagree that this can be achieved by enforcing an upper vehicle age limit on existing licences. If imposed there will be a huge unfair discrepancy between vehicle ages in Oxford compared to vehicles in other areas e.g. London, Reading.
- 3) I agree with proposals for an upper vehicle age limit of under 5 years for new licenses. This will ensure that the operating fleet will be gradually modernised.
- 4) I strongly disagree with an upper age limit of 8 years for renewal of existing licenses. As an owner driver of a Hackney Carriage Vehicle I believe an outlay of £45 000 every 8 years is not economically viable in this trade.
- 5) The present twice annual M.O.T ensures that vehicles are safe, road worthy and aesthetically suitable. In my opinion an upper age limit of a vehicle should be in line with places like London, and set at 15 years. This would ensure emissions are kept under control.

Yours sincerely,

From
Posted At: 03 June 2013 18:25
Posted To: licensing@oxford.gov.uk
Conversation: Euro Emissions & Vehicle Age Limits
Subject: Euro Emissions & Vehicle Age Limits

Licensing Authority
Oxford City Council
Mr John Copley
3rd Floor, St Aldate's Chambers
Oxford, OX1 1DS

Dear Mr Copley,

Re: Euro Emissions & Vehicle Age Limits

I write with reference to the letter dated 23rd April 2013.

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

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 believe you are being hasty and unreasonable by pre-empting the final findings of the Taxi Law Commission Reform and you have given no valid legitimate reasons for doing so.

In your consultation letter you have asked 5 questions and my response is as follows:

1. I have no problem with the Council having a plan to reduce carbon emissions and improve vehicle safety. However, I fail to understand how my vehicle and my colleague's vehicles are deemed unsuitable and unsafe if they are 8 years or over of age, when our taxi vehicles undergo stringent twice yearly compliance tests. Perhaps the council would like to explain this to me and other taxi drivers?
2. I strongly disagree with your assertion that carbon emissions can be reduced and vehicle safety can be improved by imposing an upper age limit on Hackney carriages and Private Hire Vehicles.

I copy a quote from DFT Taxi and Private Hire Vehicle Licensing: Best Practice Guide; Para 32

"AGE LIMITS. It is perfectly possible for an older vehicle to be in good condition. So

setting of an age limit beyond which a local authority will not license vehicles may be arbitrary and inappropriate. But a greater frequency of testing may be appropriate for older vehicles – for example twice – yearly tests for vehicles over 5 years old”

3. I have no objections for an upper age limit of “under 5 years of age” for any vehicle submitted for a new licence.

4. I strongly disagree with the proposal for an upper age limit of “under 8 years of age” for any vehicle submitted for a renewal of an existing licence. See my reply to No’s 1 and 2.

5. I refer you to my reply to No’s 1 and 2. Perhaps the council should consider targeting the real gas guzzlers that are causing emissions problems in Oxford and stop discriminating against the Taxi business who are subjected to stringent twice yearly compliance tests. I am referring to buses and coaches.

I would like the council to present evidence of how the quality of vehicle safety offered to the public has been in any way compromised by taxi vehicles that are 8 years or over of age to come to an arbitrary 8 year age cut off point.

I urge you to re-consider your proposals.
Yours sincerely

From:

Posted At: 13 May 2013 13:15

Posted To: licensing@oxford.gov.uk

Conversation: EURO EMISSIONS & AGE LIMITS

Subject: EURO EMISSIONS & AGE LIMITS

To whom this may concern

I think that your new vehicle licenses are both unworkable and very unreasonable

a) And b) i personally think that they should be left to the government to decide when they release findings of their consultations , i think you are jumping the gun a bit too quickly , as no one has that kind of money to replace cars that quickly due to the economic climate of the country (the cars that are cross bordering work will cement themselves in to Oxford city and you will not be able to govern the age of the vehicles from cross bordering hackney vehicles therefore impacting on the quality cars that we have in Oxford by being overrun by Lots of older vehicles from outside the oxford city borders

1) Regarding the question on consultation on whether oxford city should have a plan to reduce carbon emissions (i think oxford city should look at the sheer amount of buses which pollute far more than our PHV cars , and as regards to safety can you produce REAL figures which show how many passengers or public have been injured by PHV /HC , and at same time for BUSES and COACHES) also how many MOT'S do the buses and coach companies go through every year ??AGREE ACROSS ALL PUBLIC HIRE NOT JUST TAXIS

2) DISAGREE that this can be achieved by putting an upper limit on age , as we have two MOT'S a year and all the vehicles that are made for use as motor vehicles in Europe pass the best and most stringent SAFETY (FOR PASSENGERS AND ROAD USERS) the most strictest EMISSIONS tests before they are manufactured)

3) AGREE with the current 5 year limit for new vehicle license (works perfectly)

4) DISAGREE

THERE IS NOTHING WRONG WITH THE WAY THAT TAXIS/PHV ARE RUN AT THE MOMENT

BY MAKING THE WHOLE TAXI/PHV CHANGE VEHICLES BECAUSE YOU PERSONALLY DON'T LIKE OLDER YET PERFECTLY RUNNING TAXIS/PHV WILL NOT SOLVE ANYTHING!!

THE MASSIVE CARBON FOOTPRINT BURDEN YOU WILL PUT ON OXFORD BY CHANGING VEHICLES THAT ARE ALREADY RUNNING SAFELY AND EFFICIENTLY WILL BE IMMENSE AND WILL TAKE DECADES TO NULLIFY

THE GOVERNMENT HAS ALREADY A CONSULTATION IN PROGRESS, I THINK IT'S SENSIBLE TO WAIT FOR THE OUTCOME BEFORE YOU TRY AND MAKE A LOT OF PEOPLE SPEND MONEY THAT THEY DON'T HAVE ON CARS WHICH WILL CREATE A MASSIVE CARBON FOOTPRINT AND OUTPUT THE SAME AMOUNT OF EMISSIONS THAT YOU HAVE AT THE MOMENT WHICH WILL DO ABSOLUTELY NOTHING TO ENHANCE OXFORD AS A WORLD CLASS CITY (YOU COULD FIX THE ROADS IN OXFORD WHICH ARE WORSE THAN SOME THIRD WORLD COUNTRIES , AND STOP ROADWORKS IN SUMMER WHEN WE HAVE THE MOST AMOUNT OF TOURISTS THAT VISIT THIS GREAT CITY) THAT WOULD HELP TO ENHANCE THE CITY

From
Posted At: 03 June 2013 18:27
Posted To: licensing@oxford.gov.uk
Conversation: Euro Emissions & Vehicle Age Limits
Subject: Euro Emissions & Vehicle Age Limits

Licensing Authority
Oxford City Council
Mr John Copley
3rd Floor, St Aldate's Chambers
Oxford, OX1 1DS

Dear Mr Copley,

Re: Euro Emissions & Vehicle Age Limits

I write with reference to the letter dated 23rd April 2013.

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

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 believe you are being hasty and unreasonable by pre-empting the final findings of the Taxi Law Commission Reform and you have given no valid legitimate reasons for doing so.

In your consultation letter you have asked 5 questions and my response is as follows:

1. I have no problem with the Council having a plan to reduce carbon emissions and improve vehicle safety. However, I fail to understand how my vehicle and my colleague's vehicles are deemed unsuitable and unsafe if they are 8 years or over of age, when our taxi vehicles undergo stringent twice yearly compliance tests. Perhaps the council would like to explain this to me and other taxi drivers?
2. I strongly disagree with your assertion that carbon emissions can be reduced and vehicle safety can be improved by imposing an upper age limit on Hackney carriages and Private Hire Vehicles.

I copy a quote from DFT Taxi and Private Hire Vehicle Licensing: Best Practice Guide; Para 32

"AGE LIMITS. It is perfectly possible for an older vehicle to be in good condition. So

setting of an age limit beyond which a local authority will not license vehicles may be arbitrary and inappropriate. But a greater frequency of testing may be appropriate for older vehicles – for example twice – yearly tests for vehicles over 5 years old”

3. I have no objections for an upper age limit of “under 5 years of age” for any vehicle submitted for a new licence.

4. I strongly disagree with the proposal for an upper age limit of “under 8 years of age” for any vehicle submitted for a renewal of an existing licence. See my reply to No’s 1 and 2.

5. I refer you to my reply to No’s 1 and 2. Perhaps the council should consider targeting the real gas guzzlers that are causing emissions problems in Oxford and stop discriminating against the Taxi business who are subjected to stringent twice yearly compliance tests. I am referring to buses and coaches.

I would like the council to present evidence of how the quality of vehicle safety offered to the public has been in any way compromised by taxi vehicles that are 8 years or over of age to come to an arbitrary 8 year age cut off point.

I urge you to re-consider your proposals.
Yours sincerely

From:
Posted At: 13 May 2013 19:20
Posted To: licensing@oxford.gov.uk
Conversation: Euro Emissions & vehicle age limits
Subject: Euro Emissions & vehicle age limits

Dear Mr Copley

I agree Oxford City Council should plan to reduce carbon emissions and improve vehicle safety; however as owners of these vehicles it is not finically feasible for us to replace a vehicle every 8 years as proposed.

We have already suffered a loss of earnings (up to 30%) as a result of the recession and spiralling cost of maintaining the vehicles such as; insurance, fuel and repairs. We are already finding it increasingly difficult to keep our heads above water.

I would welcome OCC to adopt certain polices from councils such as Reading and allow vehicles to be in service up to 15 to 20 years providing they change the emission systems and are well maintained and road worthy.

In regards to safety, we are already complying with 2 M.O.T inspections every year. In my opinion this is adequate to ensure vehicles are in good condition.

Reading council have approved an emissions system which would be supplied and fitted by authorised persons, who will provide a 3 year warranty. The system costs approximately £1,500.

We would be willing to consider similar proposals in Oxford.

I disagree with an 'upper age limit' on hackney carriages due to the fact hackney vehicles are more expensive to buy and run compared to private hire vehicles. Also hackney carriages are purpose built to be long lasting as well as having swivel seats and easy and convenient disabled access. It would therefore be unfair to put these vehicles in the same category.

I feel the 8 year limit would damage the trade even further and may lead to drivers not maintaing there vehicles probably, due to the financial strains of making payments on the new vehicles, rising costs and decrease in earnings. Which may also result in owners giving up the trade altogether, this would be sad to see as many of the drivers have been in this profession over 20/30 years.

In relation to 'new vehicle licence' I agree with this proposal and agree vehicles should be relatively new when getting a new licence.

From:
Posted At: 16 May 2013 12:19
Posted To: licensing@oxford.gov.uk
Conversation: " Euro Emissions & Vehicle Age Limits"
Subject: " Euro Emissions & Vehicle Age Limits"

I'm writing off my concerns of Age limits of taxi hire cabs I been thinking long and hard on your proposal and find it hard to agree.I Don't find it financial worth it and would be very hard to coup with all the expentetures
I propose a NO limited on age of vehicles and would be accepted on as long as the mot passes the vehicle would be in very Good condition
. Thank you

From:
Posted At: 16 May 2013 01:04
Posted To: licensing@oxford.gov.uk
Conversation: Euro emissions & Vehicle age limits
Subject: Euro emissions & Vehicle age limits

Hi I have received the letter regarding age limits for vehicles and I am against the proposal as the current rules are fine. We should have 10 years for renewal of an existing license & the the upper age limit to license a new vehicle should be six years.

The consultation asks

1. Carbon emission is already low on any vehicles after the year 2000. The mot in Oxford is every six months which is more than enough for vehicle safety. As in Oxford mot station is already very strict compared to other parts of the uk. That is why a lot of drivers are coming- from other parts of uk to drive in oxford as they have it easy at the mot station in there city & can drive in oxford this should be stopped we have an age limit but if you put the age limits up all the drivers will go to other council & plate the vehicles there & drive in Oxford meaning a loss for Oxford city council.
2. No this cannot be achieved as stated above. All the drivers that cannot afford new cars & are still paying the finances on there cars like myself will either have to go unemployed & loose there cars for which they have not payed for in full, or go to another city & plate the cars there & drive in Oxford.
3. I disagree with the upper age limit of 5 years for a vehicle for a new license as stated above drivers will go elsewhere to plate vehicles & still drive in Oxford. I think it should remain 6 years to plate a new car for a new license.
4. I disagree with this upper age limit of 8 years & it should remain as it is as long as the vehicle passes the mot & is running fine why take it off the road. Like I said the mot in Oxford is very strict & owners spend time & money to maintain their vehicles to the highest standards as it is there car to drive & there own safety. Drivers are still paying there finances or loans they have taken to buy their cars. It would put them in a situation where they would loose there cars n become unemployed.
5. All cars made are build to safety standards which are required by law to have safety & low emissions to a certain standard. Otherwise the government would have a system in place were they would have to scrap every car which they thought was causing safety issues or poor emissions in the UK.

I would urge that this proposal should not be put through by the licensing department after all it is the employment of drivers you would be putting on the line. Drivers will be without a job not being able to afford there house rent going on unemployment benefits & the council would have to pay there rent, or people would not be able to afford the morgages taken out on the and in this time of recession that is the last thing we need.

From:
Posted At: 05 June 2013 13:41
Posted To: licensing@oxford.gov.uk
Conversation: "EURO EMISSIONS & VEHICLE AGE LIMITS"
Subject: "EURO EMISSIONS & VEHICLE AGE LIMITS"
Dear

EURO EMISSIONS & VEHICLE AGE LIMITS

Q 1 agree

Q 2disagree

Q 3.....agree

Q 4.....disagree (potential to increase to ten years)

Q 5 I agree with Co2 emission control in Oxford but i think this can be achieved by some other ways instead of just putting vehicle age limit up, for example the flow-thru filter is easily attached to the tailpipe of the

vehicle. The filter matrix is treated with a basic chemical compound. The vehicle exhaust is then diverted into the carbon-capture filter, which traps CO2 in a flow-by chemical reaction. The filter matrix acts as a carbon

sink, capturing harmful CO2. Once the filter is saturated with carbon, it can be easily removed from the device and exchanged for a new filter or rinsed and recharged with base material for reuse. Expect to capture

7% or about one half of the total 14% CO2 by volume coming out of the pipe. A typical 2 litre diesel vehicle less than five year old emits co2 136/139 g/km and similar ten years old vehicle emits co2 153/155 g/km, I

think this can be achieved more efficiently/economically and it will give some breathing space to most hard working cabbies in Oxford in current difficult financial climate.

Yours Sincerely.

From:
Posted At: 26 April 2013 17:02
Posted To: licensing@oxford.gov.uk
Conversation: Hackney Carriage Oxford City
Subject: Hackney Carriage Oxford City

I have read your letter date 23.04.2013
Regarding the New Licence and Renewal of Vehicle Licence.

As a Day Shift driver my point of view I disagree with the new ideas, which our taxi licensing Oxford & City Council is pushing forward from the date 01.01.2014.

Firstly buses are not owned by a individual person who drives them?
Cost Oxford County Council covers most of them?

Secondly Our City Council Public Service Vehicles are not owned by a individual person who drives them in they working day shift? and the cost of payment to safety does not come from the individual person.

Tax as a public business for bus company and other transport register with City Council & County Council get away with it by paying a low fee & Most of our buses are not to the high standard by age or emissions nor are our City Council Public service Vehicles????

Income for bus company is why more than we earn.

When you say in your letter, These proposed changes are being considered by the City Council in Oxford ? in order to reduce carbon emissions in keeping with other forms of public transport, which one do you mean? To enhance the quality of vehicle safety offered to the public, and to promote Oxford as a world Class City.....?

What our council of Oxford should be doing is checking vehicle safety and emissions test for vehicle that come in to Oxford city itself like other Taxi, Private Hire, buses & coaches Making money from them and please don't ask for more money from the Taxi Trade in the Oxford City.

There should be no age limit on Hackney Carriages as long as they pass they M.O.T and other city council safety test.

Sent from my iPad