

05/03/2014

Dear Sir/Madam, at Southampton Council.
RE: Taxi changes.

I recently received a letter from the legal and Democratic services, regarding changes to the legislation.

I totally disagree. They should think twice before changing the legislation.

A few months ago, licencing changed its 7 years policy to 9 years. A few months later, licencing changed again from 9 years back to 7 years. It is making things very difficult for the car owners. Times are very hard - less jobs are coming in for taxi drivers, and everything is expensive, i.e. twice MOT in a year. I look into Eastleigh Council, they're allowed any car as long as it is safe to drive.

Southampton City Council should listen to the opinions of the drivers, who help run the city not only the business community - EU standards should be the same for every borough - not only for Southampton.

Kind Regards

[Redacted signature]

08-03-2014

PLATE

RECEIVED

12 MAR 2014

Mk Bates

Recently all drivers

Licensed with S.C.C. received letter stating that you are considering the revocation of the two years extension for vehicles granted last year.

The grounds for this being the overall look of the vehicles and the emissions levels.

The emissions levels are monitored by your selected representatives Adams Moorey they would determine if the emissions are too high to permit the vehicles to remain in service, Not yourselfs who are not qualified to determine this. If a vehicle remains within the permitted levels of the emissions and in a good state of repair determined by the M.O.T. what

Justification can there be for remaining at
from the circuit it should stay in service
until deemed necessary by your M.O.T.
Service station to come of the road?
Southampton seems to be one of the
few councils that insist upon the change
of the vehicles every seven years,
evidence of which can be seen when
we travel the country to find cars on
the circuit that are many years older
and still work on the circuit. If S.C.C.
the life of the car is about emissions and
the look of the vehicle then the council
should stop the older vehicles coming
into Southampton to drop off and pick
up their customers and stop them from
coming into the cruise terminals and
allow us to do the work.

Yours faithfully

Unite the Union
15-16 The Avenue
Southampton
SO17 1XF

02380 637373 (T)
02380 835 919 (F)

Regional Secretary
John Rowse

Tel: 0845 605 2193
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SOUTH EAST REGION

21 March 2014

Phil Bates
Licensing Manager
Southampton City Council
Civic Centre
Southampton
SO14 7LY



Dear Mr Bates

Licensed Vehicles Age Limits

In September 2013 the licensing committee took a unanimous decision to increase the age limit of its licensed vehicles from 7 to 9 years and from 10 to 12 years for wheelchair accessible vehicles (WAVs).

The committee took into account the effect of the recession on the taxi trade [which results in taxi's doing less mileage] the improvement in taxi standards arising from the decision to impose a 6 monthly MOT on licensed vehicles (vehicles) older than 2 years, the fact that older vehicles are often solely owner driven resulting in greater care taken of the vehicle; amongst other things.

Your Officer's letter mentions emissions from older vehicles and whilst it is true that newer vehicles may be cleaner, emissions are now checked twice a year and, in 2009 you decided that vehicles had to be 80bhp regardless of engine size. In addition you permitted 1.4cc engines, which are also generally cleaner. So the Committee has taken steps in this area and it is interesting to note that your Officers did not mention this in September.

The Committee should also be mindful; that the increase in vehicle age to 9 and 12 years respectively, does not necessarily mean that those vehicles will be licensed for the full window allowed.

Regarding the concerns of the business community we believe that the effect of your decision has not been clearly seen yet and that more time should be given to analyse this. We believe that together with the measures you have already taken to ensure quality control, there should not be a problem for the business community.

As a result of your decision in September many taxi proprietors have made business decisions based on the new circumstances and to withdraw this in haste could lead to unnecessary financial problems for them.

Removal of Subsidies for Cameras

You will be aware that the trade made a strong case at the meeting in September for a voluntary situation with regard to in cab CCTV. This would have been cost free for the council and would also allow every driver who wished to have a camera system to have one that was compliant with the

council standard. After consideration the Committee voted Mandatory Cameras 4, Voluntary Cameras 4. Mandatory being carried on the casting vote of the Chair. We believe that some of those voting for a mandatory camera system may have done so believing that subsidy would remain.

That being the case we believe that the mandatory condition for taxi cameras [the Pageantry system costs £859.56], which a driver would have to pay up front, should be re-visited and further consideration given to a voluntary system. This would be cost free to the council, cost free to drivers struggling to make ends meet, and all drivers wishing to have a compliant camera system would be free to have one.

Yours sincerely

[Redacted signature area]

Sent: 28 February 2014 13:15

To: Licensing

Subject: Consultation on life of licensed vehicles and ending the subsidy for taxi cameras

Following receipt of your letter I would like to put the following points to the committee

1. I am at a loss to understand why a committee agreed to increase the allowable age of vehicles only 5 months ago, and now feel that it is the wrong decision. There surely must have been compelling reasons for the change, as well as consultations prior to implementation. Nothing has changed in 5 months so there can be no reason to revert back to the old scheme, unless the incorrect decision was made in September. If this is the case, it is something that needs to be reported to the full council.

On the subject of cameras, you say that you have spoken to HMRC who confirm the full costs can be recovered in the 1st year as legitimate costs.

You are wrong !

Perhaps you could inform every driver, who you spoke to at HMRC, and why you believe this to be the case. It has never been the case that HMRC reimburse business expenses. What in fact happens is that self employed drivers are able to offset the full cost of purchase and fitting against any tax liability they may have. This means that currently if they make a profit in excess of £10,000 they can reclaim 20% of the cost. If there profit is less then they can reclaim nothing, and have to stand the full cost themselves.

In your discussions with HMRC perhaps you could ask for some general figures on how many self employed taxi drivers currently earn less than the personal allowance and how many are currently claiming tax credits.

It is completely unacceptable that the committee increases the cost of running a vehicle, at a time when all drivers are struggling to earn a living wage.

I am personally in favour of cameras, however when cameras were introduced it was on the basis that they would be subsidised, if the subsidy is no longer there, then the requirement to fit a camera should be removed.

I hope that you find these comments helpful

Many Thanks

Steele

From: [redacted]
[redacted]

Sent: 28 February 2014 16:45

To: Licensing

Subject: Re: Life of licensed vehicles

I have just received your letter regarding the consultation on the life of private hire vehicles in Southampton. I can appreciate the concern of the business community that the cars should be presentable and not look too tatty. My solution would be to include bodywork and interior trim in the taxi compliance test. If a car has scratched or dented panels, and the seats and carpets are threadbare or torn, of course the taxi will not be of the required standard.

On the other hand, if the private hire driver has always looked after his/her car, and kept the bodywork and trim to a high standard there would be no reason for the business community or customers to worry. We already have to do two MOTs each year so the cars are definitely mechanically sound.

If the bodywork and trim was more stringently regulated, i'm sure a driver would much rather spend money on some new seats or paintwork rather than invest in a new vehicle. Remember some people actually take pride in their cars. You can have a 3 year old car that is dirty and tatty. All customers will appreciate smart clean cars regardless of their age.

Yours faithfully

Steele, Lynda

From: Richard Bates
Sent: 28 February 2014 17:07
To: Licensing
Subject: Life of licensed vehicles

Dear Mr Bates

Thank you for the letter dated 24th February 2014, I see from the letter that the council are considering reverting the life of vehicles back to 7 years due to in my opinion unfounded concerns that older vehicles will have a negative impact on the image of the city, a 3 year old car with dents looks worse than an immaculate well maintained 8 year old car.

As you are aware other licensing authorities around the country have different regulations as regards to age of vehicles , I previously worked in Lewes East Sussex where the life of the vehicle was permitted to be TEN years , however unlike Southampton the vehicle had to be a maximum age at first licensing, in their case FIVE yrs old,would it not be acceptable for Southampton adopting a similar system thereby ensuring the Vehicle is of respectable appearance.

Furthermore when I first arrived in the city I was informed that the compliance test took into account the appearance of the vehicle before a pass certificate would be issued , is this still the case ? if so the concerns about vehicle appearance becomes irrelevant . As regards to image of the city I would like to direct the committees attention to the appearance of the drivers (not their vehicles)representing the city !!!! I understand there is a dress code in place but in the four years I have been licensed by Southampton I have neither heard of or seen a licensing officer patrolling the ranks or random checks on phv drivers as regards to dress,that in my opinion will have a far greater impact on both revenue and image of the city and not the age of a RESPONSIBLY licensed vehicle.

Kind Regards

Step

From: [redacted]
Sent: 28 February 2014 18:26
To: Licensing
Subject: Fwd:Consultation on life of licensed vehicles

My apologies if you have received surplus similar emails.

----- Original message -----

Subject: Consultation on life of licensed vehicles
From: safimunsifmj2000@yahoo.com
To: licensing@southampton.gov.uk
CC:

Dear Mr.Phil Bates

Re:Your Letter 24th Feb 2014

Thank you for giving me the opportunity to have a say on the life of licensed vehicles and ending of the subsidy for taxi cameras.Having read the contents of your letter,I respectfully disagree with the idea of curtailing the life of Private Hire or Hackney vehicles on the grounds of the negative impact the vehicles might have, and the idea of emissions improvement if younger medium of transport was introduced.

I would like to express my opposition to both of them,firstly,the taxis in southampton,particularly the Private Hire ones are regularly checked for roadworthy through qualified MOT garages twice a year, making themselves sure the emission volume of each vehicle does not exceed the required limit, and secondly, taxi drivers here tend to keep their vehicles well-maintained,though there may have been some non-compliances around since several taxi businesses have been operating in and around Southampton.

The other impact it will have would have been the financial aspect as a driver whose car,though in good condition,would have to purchase a new one at any cost once the expiry date was approached,plus the concomitant costs of replacing and fitting.

Given the above, I hope the Council will seek an alternative option or continue to hold onto the decision it took on the 19th September 2013 on both catagories,A and B.

Yours sincerely,

Sent from Samsung tablet

24/03/2014

Steel *Cynda*

From: *cynda.steel@city.southampton.gov.uk*
Sent: 28 February 2014 20:26
To: Licensing
Subject: life of licensed vehicles

Dear Sir or Madam,

Regarding the proposal to reduce the age of vehicles back to 7 years, I totally disagree with this argument about the negative impact the extra 2 years on taxis would make on standards and emissions, as you are aware taxis have to pass 2 mots a year now and the appearance is checked by the taxi companies, modern cars built in the last 10 years are built to a high standard and built to last, the cost to replace a 7 year old car is astronomical and when that 7 year old car is still like new in appearance and performance, it really is disheartening, in this time of recession trying to find the funds to purchase a vehicle is very difficult and causes a lot of hardship.

When you look at Eastleigh Council they have no age limit on there taxis, so for Southampton Council to have a 9 year limit is more sensible then a 7 year limit when a vehicle still has a lot of life left in it.

I *cynda.steel@city.southampton.gov.uk*
I *cynda.steel@city.southampton.gov.uk* **xis**

Steele, Lynda

From: Lynda Steele [mailto:lynda.steele@hampshire.gov.uk]
Sent: 03 March 2014 21:20
To: Licensing
Subject: Hackney Carriage 097.

Dear Sir or Madam.

I think we are still struggling with recession, and this has more effect on a single citizen than a business community, This is a very lame excuse that the age of cars will have a negative impact on the image of southampton, i want to ask you is southampton is a better city or Winchester, why they don't think that the age of the car has negative impact on their city and Eastleigh as well, All cars doing twice OMT every year they all in good conditions, we want the life of vehicle 12 years for M1 and 9 years for B.
Thank you.

Lynda Steele

Steele, Lynda

From: Lynda Steele

Sent: 04 March 2014 12:17

To: Licensing

Subject: Taxi consultation

In response to your letter of the 24th February I do not agree with the proposals set out.

Firstly it is difficult to make a living as it is as an owner of a private hire vehicle. To re-introduce 9 years would make it harder to survive. As you know we have also had increases in diesel and cameras and renewal of MOTs and licenses. I live in Kennedy Road and the roads around me are in a dreadful state yet you say you are concerned about the 'image' of the city. If you cutback on the hierarchy in the Council then there would be more money available without looking at slicing more off us taxi drivers. A 9 year old is acceptable in many other Cities in England and often longer lifespans. Could you inform us of what businesses are concerned about this?

Secondly regarding the cameras I would like to know how the full costs of camera installation can be recovered in the first year?

Yours

Lynda Steele | Owner

Steele, [redacted]

From: [redacted]
Sent: 05 March 2014 18:59
To: Licensing
Subject: Consultation on life of licensed vehicles

Dear Sirs

With reference to your letter 24th February 2014 regarding the life of a Licensed Vehicle which was extended by the licencing committee by 2 years - after requests from various parties I respond as follows:

I note the Business Community and the Council are concerned about the 2 year extension making a negative impact on the image of the city. All licenced vehicles have to undergo inspection twice a year by V O S A REGISTERED INSPECTORATE. Are the Business Community and the Council suggesting that V O S A are not up to EU standards? On both occasions vehicles have to pass an EMISSIONS TEST: surely this alone should ensure these vehicles are fit for purpose otherwise someone is not doing their job regarding emissions? It is also the job for council licencing officers to visually inspect these vehicles... so where is the problem re: the image of the city?

I personally think they, i.e. the Business Community and the Council, should be more concerned about the condition of Southampton roads and the damage sustained to taxis by the lack of road maintenance, not to mention the endless traffic jams and the high number of unnecessary traffic lights which operate throughout the night when not needed contributing towards pollution.

The business community should be more concerned why Cruise liner passengers arriving and disembarking in Southampton disappear almost instantly: it is not the condition of the taxis causing this. The general public, including cruise liner passengers, are more concerned by the fact that they have never seen so many taxis at one time all sat doing nothing brought to its knees by costs and recession. I will add that I personally suffered costs of £37000 plus annual running costs over 2 Years as a sole trader operating Hackney plate number 281 disable capable vehicle. Please note I have responded to this letter at my expense and getting tired of wasted business time for this council .

[redacted]

Steele, I

From: [redacted]
Sent: 06 March 2014 12:09
To: Licensing
Subject: consultation on life of licensed vehicles and ending the subsidy for taxi cameras

Dear Sirs,

With regard to the above subject.

The proposal to revert back to 7 years life expectancy of the vehicle is not logical for the following reasons:

1. We have 2 MOT's a year, which control emissions and maintenance of the vehicle.
2. The vehicles manufactured over the last 7 years their engines have set new standards for cleanliness EU directives.
3. Financially, withdrawing the subsidies for cameras, 2 MOT's, and all the vehicles white, with the economic recession, is asking drivers to work longer hours to make the vehicle pay.
Drivers working longer hours on the roads creates more emissions and traffic congestion.
4. The surrounding councils have unlimited replacement life of vehicles.
5. Most of the committee who make these proposals for the standard of the Southampton licence trade have no understanding of the economics of the licensed hackney carriage and private hire trade.

Regards,

Steele, Lynda

From: Lynda Steele
Sent: 07 March 2014 09:09
To: Licensing
Subject: Taxi

Dear Mr Bates

I've been a taxi for 13 years now. And there's been a lot of changes since then. We was forced to have cameras which was wrong. I don't mind having a camera in the taxi at a respectable price witch we can afford. When I first started it was a hard taxi test to pass. But now seems very easy to pass when you get drivers come up to you asking where the docks or the hospital are and there Standard of driving is bad. The extra two years was a good idea but once again you take it away from us. We have 2 mots a year and as long as it pass them and the car looks good there should not be a problem. It cost a lot of money to put a vehicle on. Please can you send me a copy of the business community that have expressed concern. Because I pick up working class and older people and family's all there concerns are drivers don't no where they are going and not about the life of the vehicles. You could make the image in southampton by filling in all the pot holes. The damage it does to vehicles. And there's so many traffic problems in southampton then 10 years ago because of to many traffic lights and no common sense when people close roads off and no left or right turn anymore. Your making southampton a hard place to drive around in a bus or taxi and for the public.

Steel

From: [redacted]
Sent: 12 March 2014 10:49
To: Licensing; Bates, Phil
Subject: Consultation on life of licensed vehicles and ending the subsidy for taxi cameras

Dear Phil

I am writing with regards to your consultation letter regarding life of licensed vehicles and ending the subsidy of taxi cameras. I would like to respond to both points.

- 1) Life of licensed vehicles. On the 19th September 2013 you wrote to inform us that the renewal age for the vehicle had been extended by two years. This was a move that we welcomed. As you are aware neighbouring councils of Eastleigh, Fareham and New Forest do not have restrictions on the age of their vehicles meaning that an unfair market locally has been created as Southampton registered and licensed operators have had to have a younger vehicles in their fleet compared to operators registered in the neighbouring borough and yet private hire vehicles from these boroughs carry out a large percentage of their work in the City of Southampton. Essentially they are therefore able to keep their costs lower in tender situations due to the vehicles being on the road for a longer lifetime. Unfortunately the business community who you refer to as concerned about the negative impact the older vehicles have on the city are the same business community who ultimately go with the cheapest provider. Southampton City Council being one of these members. On the Southampton City Council Transport framework under which SCC car and minibus routes are tendered everything comes down to price. The quality and age of the vehicle counts for nothing and therefore operators who are registered in neighbouring boroughs who are on the framework are able to submit cheaper prices because they do not have to replace their vehicles as frequently. I would also suggest to you that the business community who have commented will include a number of car dealerships who no doubt look forward to the taxi and private hire companies having to renew their vehicles But these dealerships are generally part of regional, national and global companies. Ford have already ditched Southampton as a place of manufacture. If SCC is serious about reducing emissions then they should ban or place a tax on vehicles registered with neighbouring boroughs that are over a certain age from entering the city a bit like the low emissions zone in London. **I therefore request that you kindly keep the vehicle age increase you implemented on the 19th September 2013.**
- 2) Taxi Camera subsidy we understand the councils need to make budget cuts but again I refer you to my argument about private hire vehicles registered in neighbouring boroughs again they do not have to meet this criteria to have them fitted which in tender situations gives them an advantage. I happen to think the cameras are a very good idea can SCCs licensing team influence the neighbouring borough councils in introducing cameras into their vehicles?

Yours Sincerely

Steel
From:
Sent: 13 March 2014 20:10
To: Licensing
Subject: Life of Licensed Vehicles

Dear Sirs

I wish to object to the proposal that vehicles revert back to the 7 year life.

Its bad enough that there isn't enough work in the city, due to the allocation of too many private hire vehicles, on some days we struggle to do 8 jobs a day. Therefore not earning enough to keep replacing our cars. That extra 2 year life has given a lot of us a much needed life line. The cars have 2 mots a year to ensure they are fit to be on the road in the City of Southampton. You go to any other towns around Southampton and you will find their cars can be up to 10, 11 or even 12 years old, and these cars are coming in to our city and probably picking up from the same businesses that want us to revert back to younger vehicles.

There is quite an easy solution to check the condition of the cars, every mot on a car over 7 years old, should go to Adams Morey for every mot and not just the yearly one. Common sense on their part should tell them whether the car is suitable for private hire or not.

I agree there are cars that shouldn't be on the road after 7 years, but normally because they are running 18 / 24 hrs a day, due to being double / triple banked. Perhaps this should be taken into account.

Yours faithfully

To the licensing team

I'd like to express my views and concerns about the proposed sudden u turn on the age limit of hackney and private hire vehicles within the city.

In your letter dated 24th February 2014 you mention local companies express concerns but you fail to name the companies that opposed the changes! Surely we have a right to know the name of the opposing companies, also if the views of those companies were so important maybe you should have contacted these companies with the proposed 19th September 2013 before you put the changes into motion! Also do these companies know of the strict council guidelines & 6 monthly mot & emission test we abide by?

My own private hire vehicle is a 08 plate which I have serviced regularly in a Southampton licensed mot Garage & also cleaned inside and outside weekly, I can honestly say that I have never had a single customer express concern about my car but everyday I receive numerous complimentary comments from customers about how well kept and clean my car is, also when hackney & private hire vehicles have there mot tests at Adam Moreys I would hope that they liaise with you and would contact you with concerns of any vehicles with numerous failures or advices, I feel you should take action against the owners of these vehicles not punishing the owners of who look after their vehicles and keep them roadworthy, surely a better way would be to make any car with numerous failures or advices from Adams Morey to have 3 monthly mot tests at Adams Morey for 1 or 2 years, that way you are taking action against owners who neglect their duties to the council & the public.

I'd also be interested in the legality of such a sudden u turn in your proposed changes?

For instance if I bought a car from a garage with a 3 yr warranty then 18 months later I took the car back to the same garage for repairs to a fault and the garage told me that 6 months after I bought the car they changed the warranty from 3 yrs to 1 yr! It seems to me that your proposed changes equate to the same!

If you bring these changes into effect it should only effect new & change hackney and private hire vehicles from the date of the 24th February 2014 letter.

I personally paid out a substantial amount of money on my private hire vehicle at the end of December 2013 on a new clutch and flywheel on the understanding of the extra 2 years plate life on my 08 vehicle! Without the extra 2 years I may have decided not to pay for the expensive repairs & looked around for a newer replacement vehicle & I should imagine a lot of owners have had similar expensive repairs done on the promise of the extra 2 years.



Finally modern cars these days are built far better than cars in the past & last a lot longer when well maintained so I think the extra 2 yrs reflects fairly on this.

Yours sincerely

Philip [unclear]

Steele, | v1000

From: [redacted] [mailto: [redacted]@southampton.gov.uk]
 Sent: 18 March 2014 21:40
 To: Licensing
 Subject: Re: Consultation on life of licensed vehicles and ending camera subsidy for taxi cameras

From: [redacted] [mailto: [redacted]@southampton.gov.uk]
 Date: Tue, 18 Mar 2014 21:40:00 GMT
 Subject: Consultation on life of licensed vehicles and ending camera subsidy for taxi cameras
 To: Licensing@southampton.gov.uk

My comments are as follows :-

LIFE OF LICENSED VEHICLES

The two year extension to vehicles was given to ease the burden on proprietors at a time of recession. This decision was taken 19/9/2014 which is exactly 5 months since you wrote to us regarding wanting to revert to the old age limits. To my knowledge the recession within the Taxi trade is still very much with us to which I will come to in a minute. You cite the reasons to revert to the old limit are 1) the business communities concerns on the image of the city and business in general and 2) in addition EU improved standards on newer vehicles and the councils desire to reduce emissions within the city. My response to these points are as follows- Firstly all licensed taxis and private hire vehicles in the city are subject to a strict hackney or private hire mechanical test which also covers the bodywork and interior once a year. In addition they are subject to a normal MOT test six months later. Should we lobby for a ban on all private vehicles over seven years old within the city, I wonder what the business community and public would make of that?!!! Secondly 99% of the present fleet of taxis and private hire vehicles already meet EU standards and in fact are taxed at a reduced rate because of low emissions. Reducing the the life of the fleet by two years will do nothing when Buses Hgvs and the general public vehicles are taken into account. The Licensing Committee very rightly made their decision 5months ago to ease the burden on hard pressed taxi drivers by extending the lifetime to a quite reasonable 2 years in line with many other Authorities in the UK. For Gods sake there has been no time to test that decision FIVE MONTHS!!!

Going back to point on the recession in your letter regarding the taxi camera subsidy you state that there is an average of 100 new private hire vehicles being licensed every year this equates to £2000000 coming out of the earnings of the present fleet of drivers every year. Our income has fallen in real terms by 40% WE ARE ON OUR KNEES. If things carry on the way they are going there will be no trade. Drivers working longer and longer hours servicing being neglected and illegal minicabs all over the place. Please work with us not against us a good trade is in all our interests.

TAXI CAMERA SUBSIDY

I have no problem with the removal of the above subsidy. Proprietors have had enough time to have cameras fitted .
 (owner/driver)

24/03/2014

Steele, [\[redacted\]](#)

From: David Billinghurst [mailto:billingsd22@btopenworld.co.uk]

Sent: 18 March 2014 21:32

To: Licensing

Subject: life of vehicles

Dear Mr Bates

I think it would be unfair to reduce the age of vehicles back to 7 years and 10 years as some owners have replaced vehicles thinking they have a set number of years left for that to be reduced by 2 years would mean more expense for them not only for the vehicle but the cost for fitting meter camera and radio .

I know of one driver who spent about £900 on clutch and dual mass fly wheel because he had 3 years left but if he had to change his car next year he has wasted £900.

If one of the reasons was to help proprietors at a time of recession we are still in a recession but the news will tell you different.

May be you could make it any vehicle replaced from the date of the meeting will be 7/10 years but 9/12 for all other vehicles

As for the cameras I thought funding ended a long time ago

Steel, Lynne

From: Lynne Steel
Sent: 19 March 2014 20:11
To: Bates, Phil
Subject: Age of Vehicles, Taxi Camera Subsidy

Good Evening Phil,

This is the Southampton Hackney Association's (SHA's) response to the lowering of age of vehicles and subsidy of camera's.

We would of course like to see the correspondence from the business community who express their concern of having older vehicles working as taxis in Southampton because of a negative impact they will have on the image of the City.

Category A Vehicles M1 Classification

These vehicles can range in price from approx. £16,00 to £40,000, depending on the size of disabled ramps and how many seats the vehicle has. There does not appear at the present time for an electric vehicle to have been produced that has been approved by the necessary bodies and has passed beyond doubt the M1 Specification, although we believe that there are some in the early stages of manufacture.

Category B Vehicles

If there is a case for a saloon car having an extended life because of it's electric capabilities, we would say that there should be no discrimination between the electric one/normal engine type.

Taking all this into consideration with regards to Category A and B Vehicles, we would like to make two suggestions :-

1. We feel it would be appropriate for members of the Licensing team to spend a bit more time observing taxis, parked on ranks. The exterior and interior of these vehicles should be checked on a more regular basis. For example, when we used to have the annual fare increase, it was conducted within the Docks. Vehicles were at least checked by the licensing team for faults. This does not happen now in any shape or form, at any time. We would suggest that if vehicles have torn seats, are generally dirty, have dents, etc., they should be taken off the road, repaired accordingly and presented to the Licensing Office before they are allowed to resume their job description as a taxi.
2. Taxis that have one driver on the vehicle, whether they be rented or driven by an owner driver are generally looked after far better than a vehicle that has multi-drivers. We would suggest that when a particular vehicle has reached it's so-called age of removal as a licensed taxi, an appointment should be made at VOSA situated at the Industrial Estate at Bitterne Manor for the vehicle to be thoroughly checked over to ascertain if an extension of one year can be approved? We must take into consideration that when a vehicle is over a certain age, it has to have, apart from the yearly compliance test, another MOT carried out throughout the year.

Subsidy of Camera's

It would appear that unfortunately due to the Council's budget, the subsidy for the camera's is to be taken away. The SHA committee has investigated as best as we can this contentious subject of in-car cameras and the three camera makes we have at the moment that are approved by this council are - Brigade, Pageantry and Verifeye. Because of the so-called fixed storage unit that these camera's

have, they are ideally suited for their purpose, especially if the film is required to do with a Court Hearing. But if the £250 subsidy is taken away, these become an expensive item, so we would suggest that the camera becomes voluntary?

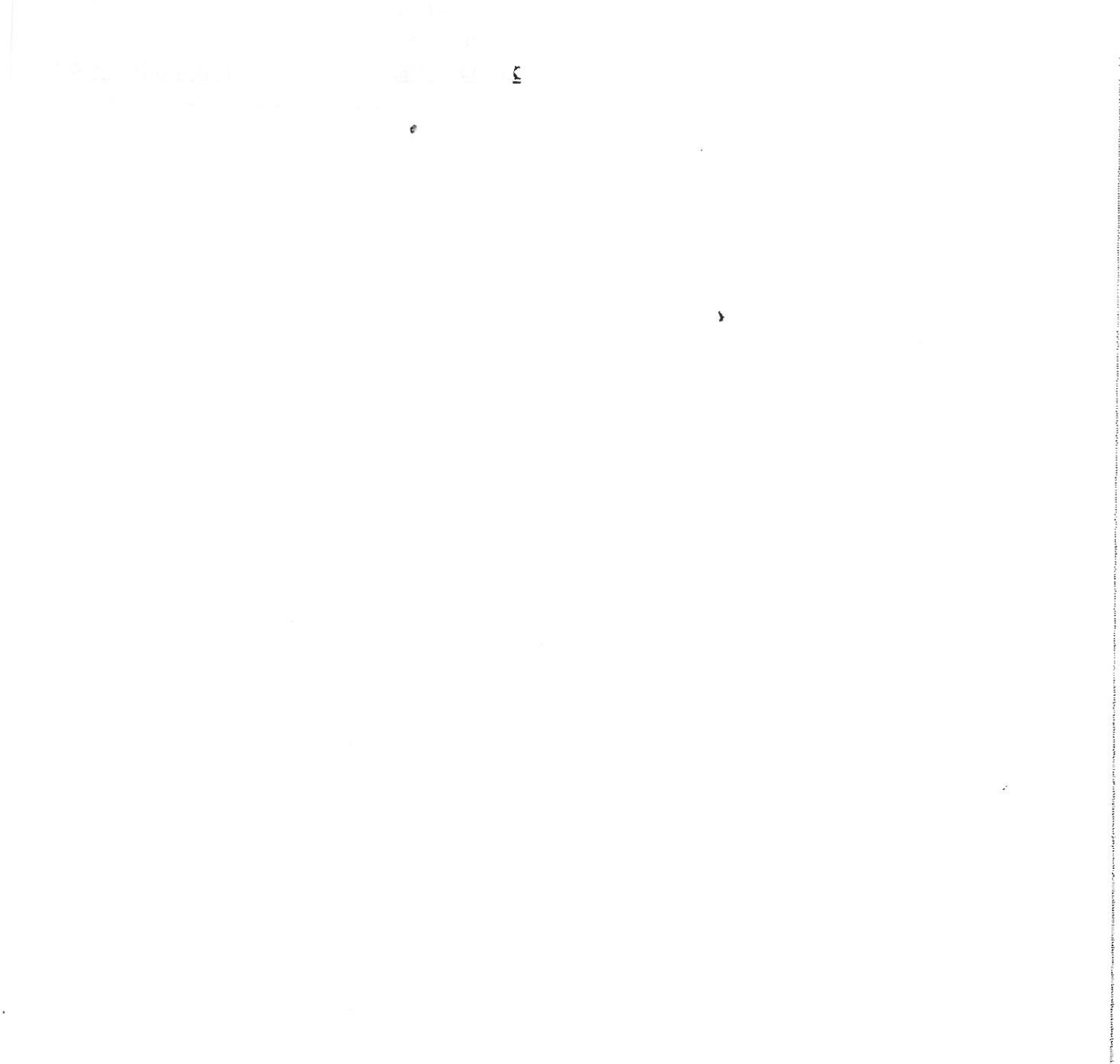
We now have the situation that although there are cheaper models on the market, they have a SD Card, instead of a fixed storage unit. Our suggestion, if the camera's cannot be voluntary, we need these cheaper models that could be fitted with a seal so that the camera is not tampered with. Can this possibility be looked into?

Looking forward to hearing from you.

Regards,

Tom Hall

COO/BM



Steel

From: [redacted]
Sent: 20 March 2014 16:34
To: Licensing
Subject: Fwd: Delivery Status Notification (Failure)

Forwarded conversation

Subject: Life of licensed vehicles

From: Steven King <[redacted]>
Date: Fri, Mar 20, 2014 at 1:28 PM
To: [redacted]

Dear Mr. Bates,

I would like to give my views on the proposed life reduction for licensed vehicles to 7 years. The original argument to increase the life was to ease the burden on drivers. I'm not sure what has changed in this respect. It is extremely difficult to make a decent living in the trade today. There is a limit on Hackney Carriages in Southampton but not on Private Hire Vehicles. I would be interested to know the number of vehicles year by year as there does seem to be too many vehicles for the amount of work in the city. Also because Hackney Carriages do not seem to be policed there is less work from certain nightspots in the city for Private Hire Vehicles, due to the drivers sitting right outside these bars. These include Revolution (even though they have been repeatedly told not to), The Edge, For Your Eyes Only and Cargo (even though there is a rank round the corner so cheating their own colleagues).

With regard to the arguments concerning the actual vehicles I cannot see that 2 years is going to make any difference. Modern vehicles are extremely reliable and 95% of drivers keep them up together mechanically and with respect to cleanliness. Also because we have 2 MOTs a year any fault is soon found and I personally always have a full service before both my MOTs. Within these MOTs is an emissions test which has to be passed so I'm not sure what the argument there is. In order to reduce emissions perhaps the council should stop putting up unnecessary traffic lights and make sure that they operate more efficiently.

Finally I'm sure there are more safety issues with some drivers working in excess of 14 hours a day in order to make a living than there is with vehicles being 2 years older. After visiting many areas around the country I'm can see that Southampton Licensing Dept. is one of the strictest in regard to the age and condition of vehicles. This in itself is a good policy but again reducing it back to 7 years will only have the effect of penalising drivers in these tough times.

I hope you will take into account these points and keep it as it is.

Yours sincerely

21/03/2014
Bitterne Cars Ltd
10 Dean Lane Road
SO14 7TY

21/03/2014

Response to consultation letter of 24/02/2014

Life of licensed vehicles:

We are surprised that the business community have expressed concern about the negative impact of the change.

Are we to assume that the business community only use Southampton licensed vehicles as many other licensed vehicles from adjoining councils who have far different regulations to Southampton service these business's.

We believe that with a compliance test once a year and an M.O.T. six months later Southampton's licensed vehicles are well regulated and we believe the age is not an issue.

We also believe that we are discriminated against in respect of vehicles from other local council's not having age limits as stringent as Southampton's.

Why does this council operate anti competitive rules against their own vehicles?

We have driver's who have made business decisions based on the 19th September's resolution and any change now will have a detrimental effect on their continuing finances.

On the point of emissions, whilst we accept that it is desirable to try and reduce them, is it only taxi's that are being targeted as this council subsidises other public transport i.e. buses, SCA mini buses and the like without imposing age limits.

Our considered view is that the resolution passed by councillors on the 19th September should not be reviewed or changed back to the previous ruling.

Taxi Camera subsidy:

We accept that the subsidy cannot be maintained in the current economic climate.

However, our view has always been that we are totally opposed to all vehicles having to have a camera and surely there must be cheaper alternatives available.

Observations:

It is our considered opinion that this consultation letter has been produced by the licensing department and falls outside the democratic process of the licensing sub committee.

For and on behalf of Bitterne Cars Ltd.

Steele,

From: [redacted]
Sent: 23 March 2014 22:48
To: Bates, Phil
Subject: Re consultation on age and cameras

Mr Bates,

Before I begin may I emphasise that I am making my response as an individual and not as a trade rep.

Re Age of vehicles:

On 19th September 2013 the vehicle age increase by 2 years was one of the welcomed of all the items put to the licensing committee but the same could not be said of certain parties.

To try to revert this before any ample time has been given to trial and monitor fleet quality is a grossly *hostile* move, 5 months have passed but the number of vehicles replaced in this period have been minimal hence to jump to the unsubstantiated conclusion that image of fleet has and will hinder that of the city is *farcical*.

The arguments used against the age increase are weak:

Polluting vehicles : this is weak, many vehicles have Euro 4,5 & 6 diesel engines which are fully compliant with current E.U standards and of those welcomed in London.

It is once again weak as in August 2009 the then licensing manager found that smaller engines were capable of higher b.h.p hence he changed the engine requirement from 1600cc to 80 b.h.p with engine cc irrelevant, the change was based on the fact that smaller cc engines could be introduced into the trade.

So how can such vehicles can suddenly become more polluting ? Most Euro 5 & 6 use low ash engine oil which creates less carbon than mineral oils and ordinary semi & fully synthetic oils.

Fleet quality:

9 or 12 year limit is a window in which anyone can put vehicles on that though they maybe 5 years old but could have lower miles than one which is 3 years old they mostly only stay on for 4 years average. But, if any vehicle can last longer and still look good while being more than 7 years old then credit should be given to owner for looking after it. The theory of Darwinism springs to mind, the weak will die and the strong will go the distance, the vehicle itself will prompt the owner to change it. Age is a number.

Other parties being "*concerned*" about the city's image: to these people/businesses I would say that they should get and keep their own houses in order.

If it's hotels allegedly complaining then they should firstly shake off their Blackpool guest house image fit only for cheap stag weekends, if it's retail segment allegedly complaining then they should try to discover some individuality, if it's eateries allegedly complaining then they should try their hand at culinary hand aimed at man and not beast, if it's an entrepreneur allegedly complaining then let us have a say in *his* business and finally if it's a public servant

then let us choose *his* suits so he looks like a member of the *bar*.

The most compelling reason for an age increase was the fact that the financial downturn was biting hard & is still very much alive and present with no end in sight which then leads to the point that vehicles are subject to much less wear and tear than 4 years ago.

So far in countering the weak case for reversing the age limit has been academic as I feel I am not contending with a case but a personality or maybe two but not very challenging ones to say the least.

Whatever force is behind this "*coup*" are deeply insensitive to how some of my colleagues are going to be affected it is to this effect that determined me to speak up in the hope that some of their thoughts will be aired in my response to this very much unnecessary consultation prompted by a vendetta to hurt individuals whose budget plans and decision forecasts are being hampered creating an period of severe uncertainty.

One should be also mindful that the second hand car market is currently very strong in prices, I can give you a personal example : April 2009 I bought my Mercedes Vito for £16500, it was 4.5 months old with 5553 miles it is a 58 plate. 4 weeks ago I enquired about the same vehicle the dealer had a 58 plate with 70k circa miles the price was £13999+ vat @ 20% =£16798 - older but dearer than 5 years ago!!

Re cameras, as the powers that be are so in favour of this they will keep it all costs. This was brought in as compulsory with the premise of subsidy : if no subsidy as promised then this should be voluntary.

To end may I say that those who have stirred up this furore are insensitive tyrants hurting and hindering my colleagues especially those who are migrants hence afraid to express their worry and hurt as they feel they have no right of voice in foreign lands.

Kind Regards

Kind Regards,
John

