

TPR1

From: Rogate Cars <[REDACTED]>
Sent: Monday, March 1, 2021 10:31 PM
To: Taxilicensing <Taxilicensing@chichester.gov.uk>
Subject: Mot & Fitness testing

Hi

The only comment I would like to make, is that I believe you should use other garages for fitness and MOTs. (still use your garage as well)

Hampshire and other licensing authorities have quite a few registered garages for the above.

I appreciate it will knock your income, but we struggle with just having fitness tests on certain days not 5 days a week. Perhaps put your services up to a 6 day working week like all other garages.

Thanks Kevin Farren

Rogate & Midhurst Cars [REDACTED]
[REDACTED]

TPR2

From: Sean M (Uber) <[REDACTED]>
Sent: Tuesday, March 2, 2021 8:59 AM
To: Taxilicensing <Taxilicensing@chichester.gov.uk>
Subject: Re: Consultation - Draft revised Hackney Carriage and Private Hire Policy and Conditions



Your request (77323) has been updated. To add additional comments, reply to this email.



Sean M (Uber)

Mar 2, 2021, 8:59 GMT

Hi Licensing Team,

Thank you for bringing this to our attention. We will ensure to take the appropriate action.

If there is anything else we can do to assist in this regard, please don't hesitate to let us know.

Kind regards,

Sean M

TPR3

From: kim mullen <[REDACTED]>
Sent: Wednesday, March 3, 2021 9:55 AM
To: Taxilicensing <Taxilicensing@chichester.gov.uk>
Subject: Re: Consultation - Draft revised Hackney Carriage and Private Hire Policy and Conditions
From Kim Mullen
Badge no [REDACTED]
Station Taxis
Reg no. [REDACTED]

Dear sir/madam

Section. Part D section 20

In reply to your email 1-3-21 regarding vehicles over 10 years old, which have to be replaced when the vehicle is 10 years old.

Vehicles have been given a 5 year term before replacement is necessary, this is unfair to drivers of newer vehicles. There are several vehicles working the rank at the station that are 2008 and 2009 registered vehicles, this means that those vehicles will be 17-18 years old when they will need to be replaced. This seems that driver's of newer vehicles are being penalised for having newer vehicles.

I will need to replace my vehicle when it is 10 years old. This seems totally unfair and discriminatory to those newer vehicles.

Surely staggering this replacement of vehicles should be considered.

Yours Sincerely

Kim Mullen

[Sent from Yahoo Mail for iPhone](#)

TPR4

From: Central Cars <[REDACTED]>
Sent: Wednesday, March 3, 2021 10:14 AM
To: Taxilicensing <Taxilicensing@chichester.gov.uk>
Subject: 'Hackney Carriage/Private Hire Policy Consultation Response
Attn David Knowles-Ley

David,

With reference to the above can you please clarify the following :-

Licence holders will be required to conduct and evidence that Basic DBS Criminal Record checks have been conducted on booking & dispatch staff, and maintain a record of such checks for inspection by this Licensing Authority

At the start of lockdown in March 2020 we vacated our office and all of our operating staff now work remotely from home. They do not have face to face contact with any customers - all their work is carried out on the phone. We do not anticipate returning the staff to an office in the foreseeable future and wonder if and why a DBS check is necessary. All of our operating staff have worked for us in excess of 10 years.

Look forward to hearing from you
Carole Foster
Central Cars

TPR5

From: adrian arnell <[REDACTED]>
Sent: Wednesday, March 3, 2021 1:16 PM
To: Taxilicensing <Taxilicensing@chichester.gov.uk>

Subject: Re: Consultation - Draft revised Hackney Carriage and Private Hire Policy and Conditions

Hi There i could not find section 20 which relates to the text below and was wondering how this effects a 5 year old taxi in the long term thank you.

Currently, vehicles proposed for licensing must either be compliant with the Euro IV emissions standard or have been previously licensed. The proposal is to require that vehicles the subject of a new vehicle licence application (irrespective of whether or not previously licensed) must comply with the current or immediately preceding Euro emissions standard (or any subsequent standard replacing it) and will only be licensed up to a maximum of ten years from date of first registration. Existing licensed vehicles will benefit from a five year transitional period which will allow licence holders time to prepare to replace their vehicle(s). **(Section 20 of the policy)**

Adrian Arnell

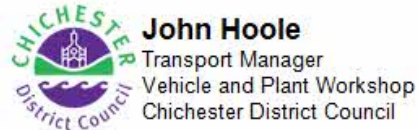
TPR6

From: John Hoole
Sent: 04 March 2021 14:12
To: David Knowles-Ley
Cc: Steve Bingham; Jon Munday
Subject: Drivers

David

Both myself Simon and Andrew are having difficulty now with drivers turning up who can't speak any English, it takes up a lot of our time trying to explain stuff to them which they do not understand. Could you please include an English language qualification into the entrance exam, it would make our lives at the depot a lot easier,

Regards



Ext: 21183 | Tel: 07766206522 | jhoole@chichester.gov.uk | Fax: 01243 532695

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TPR7

From: Katy Fletcher [REDACTED]

Sent: Monday, March 15, 2021 2:39 PM

To: Taxilicensing <Taxilicensing@chichester.gov.uk>

Subject: Consultation response

Dear Sir/ madam

I have read the changes regarding the licensing of private hire/ hackney cabs. I was disappointed to find that there was no change to the requirement that every private hire driver needs a medical every year after the age of 60 years.

I have written to you on this matter before and I was told that when the consultation period arrived this matter would be considered but I have found no mention of it.

At this time with the coronavirus constrictions and having survived three lockdowns I am still in business but there is no work. I am now 62 years old and do not get my pension until I am 66 years old therefore I will have to continue to work maybe until I am 70 years old. To have to pay for a medical each year at the cost of £120 each time when I have no underlying health conditions seems to me to be an unnecessary expense and one at this time that I could do without on an annual basis.

Last year I could not get a medical until October - it was due in July! And I will have to get another one this July which makes it less than a year!

Again I wrote to your department last year about this but received no response.

We have all these expenses to pay - licences from CDC , car tax, insurance, fitness tests MOTs and servicing etc and we can't even work!

I would like to request an exemption from my next medical in view of the current situation and a review of all our expenses already paid for this year with no work. I am sure I am not the only taxi driver who is in this position and it would be great to have your support or a gesture of goodwill towards me and my fellow workers.

Regards

Katy Fletcher

Sent from my iPhone

TPR8

From: The office Rogate and Midhurst Cars [REDACTED]
Sent: Wednesday, March 17, 2021 11:31 AM
To: Taxilicensing <Taxilicensing@chichester.gov.uk>
Cc: David Knowles-Ley <Dknowles-Ley@chichester.gov.uk>
Subject: RE MOT Test advisories ,

Good Morning

Thank you for the last email, is there still time to have my say before this not thought out properly
Legislation becomes legal.

I am not against the idea but I think it needs tweaking, as the last legalisation I campaigned to get it removed, as Chichester district council was putting lives at risk.

I cant see how a Taxi Licencing officer can make a mechanical decision, too in force in Monitor and repair if necessary (advisories) on the MOT if it gets mentioned twice in a yearly period.

If there is a defect which is dangerous or liable to be dangerous it would fail, a high per portion of MOT testers see the advisory sheet and duplicate the wording if they see the part hasn't been replaced. Things like a stone chip in zone b on a windscreen would be a waste of money to replace, but would a local council taxi admin officer have the knowledge to say replace or its structurally ok.

Don't get me wrong I think it is good to raise standards, but it needs to be implemented with common sense and to have qualified vosa approved people making the decision.

Many thanks Kevin Farren

Sent from [Mail](#) for Windows 10

TPR9

From: Enzo Caira [REDACTED]
Sent: Thursday, March 18, 2021 10:59 AM
To: Taxilicensing <Taxilicensing@chichester.gov.uk>
Subject: Subject : Hackney Carriage/Private Hire Policy Consultation Response'
Dear Sir/Madam

I wish to comment with regard to Annex 1, Vehicles, Section 20 of the policy.

If I understand this correctly, these proposals mean that the 65 Plate Vehicle I bought in 2019 will have its final licence in 2024 when it will be 9 years old. I will finish paying the finance in 2024, at which time I will be required to finance another vehicle less than 10 years old to continue operating as a Hackney vehicle in Chichester.

In the meantime there will be a substantial number of vehicles that are currently over 10 years old having the benefit of a further 5 year "transitional period" in order to make provisions to replace their vehicles.

If these proposals come into force this year (2021), it means that whilst I am unable to Licence a 10 year old vehicle after 2024, there will be vehicles over 15 years old being allowed to renew their current Hackney Licence up until 2026.

These proposals are heavily weighted in favour of Drivers who have made no significant investment in recent years, and are punitive towards those of us who have made recent major financial commitments to our trade.

Regards

Enzo Caira
Tel [REDACTED]

TPR10

DRAFT HACKNEY CARRIAGE AND PRIVATE HIRE

POLICY AND CONDITIONS 2021 – CDC Climate Change Officer Response

Introduction

This response concerns Section 20 of the consultation document. The draft policy in Section 20 has been modelled to assess if it would aid meeting CDC's district wide target to reduce greenhouse gas emissions.

Background

To provide some background to the target, in July 2019 CDC declared a Climate Emergency. This led to the production of an initial action plan that was approved by full council in January 2020. The action plan contained a target of reducing greenhouse gas emissions in the district by 10% year on year until 2025. Taking the year in which the emergency was declared (2018-2019) as the base year, this would lead to cumulative reductions of 47% by 2020-2021.

Section 20 states that all vehicles must comply with the current or immediately preceding Euro emissions standard (or any subsequent standard replacing it) at the point of application to be licensed for the first time. The draft policy would also apply to vehicles whose registration is being renewed (see Section 20 for specifically how it would apply) after a five year transition period.

Modelling

In the modelling it is assumed that the draft policy is implemented on October 2021. The transition period would therefore end in October 2026. The model only tests whether the new policy will lead to a 47% annual reduction in emissions from the base year. This is because it is not known when taxi-drivers will change their vehicles in response to the new policy. So the model assumes that they wait until the deadline before complying. Therefore it does not test whether the policy will lead to the 10 % year-on-year reduction in emissions which is better for reducing climate change. This is a weakness due to one of many pieces of missing information. The key data gaps are outlined next.

By 2026, it is expected that a new Euro emissions standard (Euro 7) will be in place replacing the current latest standard Euro 6. A difficulty with modelling the effect of the policy is that the carbon dioxide emission ceiling for Euro 7 vehicles is not yet known and expert advice has had to be sought for a prediction. Hence it is assumed Euro 7 will be 50gCO₂/km.

A second point to make is that the number of taxis, specifically Private Hire Vehicles, licensed by CDC grew significantly in pre-Covid years. The reason this is important is that a growth in the number of vehicles licensed as taxis will reduce or even possibly eliminate any emission reductions due to higher emission standards.

Based on discussions with the Licensing team, this growth has been attributed to Uber selecting Chichester District Council as one of the councils at which gets its vehicles licensed. This decision by Uber took effect in December 2016. In the following year, the number of taxis licensed by CDC grew by 9%, and subsequently 13% growth (2018), and 13% (2019). Prior to Uber joining growth was 3-4% pa. It has been assumed that in future growth will return to a pre-Covid average rate of 12% a year. However, Uber will have to decide in December 2021 whether to renew its use of CDC as a licensing hub.

As Uber does not use every local authority as a licensing hub, this raised the question of whether more vehicles with addresses outside of Chichester district were being licensed by CDC. This is important because vehicles with addresses some distance from Chichester district are unlikely to do much mileage in Chichester and therefore their emissions would not count towards our target. Available data suggests that CDC has been licensing a greater percentage of vehicles in non-neighbouring local authorities e.g. Southampton, Portsmouth, even Walsall. However, the percentage of vehicles in neighbouring authorities has reduced by a commensurate amount. The initial conclusion is that pre-Covid there was roughly equal percentage increase in the numbers of taxis with addresses inside and outside of the district.

In estimating the carbon dioxide emissions from the draft policy, I have assumed:

- 75% of the mileage of those taxis registered in Chichester district takes place in the district.
- 25% of the mileage of those registered in adjacent local authorities (Havant, Arun, Horsham, Waverley, East Hants) takes place in the district.
- 0% of the mileage of those registered in non-adjacent local authorities takes place in the district.

This assumption on mileage has been applied in a model that goes to 2027, a year after the transition period has ended.

It has already been agreed with the Licensing Manager that this modelling will be repeated annually, progressively reducing the data gaps and that the Climate Change Officer will contact the University of Chichester to see if a student/s are interested in improving the model as a research project.

Results

Looking at 2027, emissions will hardly be reduced (-4%) if vehicles switch to Euro 6. If they switch to Euro 7, emissions will be reduced by 34%. This is considerably better, but the target is for emissions to have reduced by 47% by 2025.

Conclusions

These numbers show that other actions in the district will have to make up for a shortfall in emissions reductions if vehicles are replaced by Euro 6 vehicles rather than vehicles with emissions at 50gCO₂/km, the assumed rate for Euro 7. That will be difficult as the scale of change required in all sectors is already very challenging.

It is therefore vital that CDC encourages vehicles to be switched for vehicles with emissions at 50gCO₂/km or lower. This will also be difficult because taxi-drivers are expected to buy second-hand vehicles rather than new and the second-hand market in vehicles with emissions of 50gCO₂/km or lower is small. Therefore the following paragraphs outline some suggestions in trying to make it more feasible for taxi-drivers to make the switch.

Recommendations

The suggestions draw heavily on a comprehensive report which was produced by Uber in 2020. Uber – the largest mobility platform in the world - has made the following commitment: by 2040, all rides on its platform across all global markets will be in vehicles without any exhaust emissions - whether it is a car, bike or scooter - or on public transport. In Europe specifically it is attempting to make faster progress. Its focus is battery electric vehicles (BEV) with no exhaust emissions i.e. it excludes hybrid EVs.

Proposal 1: Reduced fees for lower emitting vehicles

Have a differentiated set of charges for licensing and renewal depending on gCO₂/km of the vehicle. The average emissions of CDC licensed taxis is 139g CO₂/km (2 September 2020). All vehicles with emissions above the mean average could pay more offsetting reduced rates for those below the mean average.

Proposal 2: Install EV chargers near homes of EV taxi drivers

West Sussex County Council is responsible for rolling out roadside electric vehicle charge points. The council could prioritise the installation of charge-points near the homes of taxi-drivers interested in using electric. The recommendation is to resume the discussion with WSCC on this proposal.

Drivers prefer charge-points located where they park their vehicles overnight. Uber identifies the lack of appropriate charging as one of its three key barriers to BEV adoption. Uber makes the point that high-kilometre commercial drivers usually do not live in homes with their own driveway enabling them to install their own EV charge-point, so they are reliant on public infrastructure. Furthermore the charge-point needs to be located close to their home or they lose earning time in travelling to and from the charge-point.

A system could be set up so that these drivers could request that a charge-point is located near their home if they have committed to switching to an EV. While it would not be possible to guarantee them access to a public resource, setting up EV charge-points in groups of two would increase their chances of getting access when they need to and installing two at the same time would offer economies of scale. Prioritising high-kilometre commercial drivers over domestic car users makes environmental sense as they drive more. Furthermore, **providing charging at the request of a driver (or group of drivers) guarantees the**

demand needed to make the case for investment (Uber 2020). Uber has said it can provide aggregated data on where charging for its drivers may be required.

Proposal 3: A “try before you buy” day

Brighton & Hove City Council surveyed taxi drivers and found that their biggest concern about switching to EVs was that they would be low or sluggish to drive followed by them being expensive to run. This could be addressed by a “try before you buy day”. Taxi drivers would be invited to test out EVs. CDC could have laptops on hand to calculate the Whole Life Costing of the vehicles to drivers using the software that is already available on the CDC website.

Proposal 4: Look at ways to reduce the capital cost of EV

The Government has a [plug-in grant scheme](#) to incentivise electric vehicle purchase. It varies according to the vehicle and ranges from £2,500 to £7,500. It covers purpose built taxis as well as passenger cars and vans. However, electric vehicles are still more expensive than their petrol and diesel alternatives. So four options have been presented, all of which would require development to assess their feasibility.

Some councils (Southampton City Council and Eastleigh Borough Council) have offered cash back for replacement of a more polluting taxis with a low emission alternative. The amount of cash back varies between £1,500 and £3,000 depending on the alternative (Low Emission Taxi Guide p16). The reduction in greenhouse gases per pound spent could be estimated to see if this represented value for money. An alternative would be to work with a regulated financial intermediary to offer no-interest loans underwritten by the council.

A third option would be to introduce EV leasing businesses to taxi-drivers by organising a workshop at which leasing businesses can present their offers and taxi-drivers can have help in assessing the running costs of EV versus petrol/diesel vehicles.

A fourth option would be to look at an initiative of Oxford City Council. It has helped drivers offset the cost of switching to an EV by helping them to secure on car advertising.

Proposal 5: EV rapid charger at Chichester rail station taxi rank

It might reassure driver anxieties about being caught short of battery power if a rapid charger was available at the train station taxi rank. A rapid charger is much more expensive than slow or fast chargers at £20k-40k. Oxford City Council was proposing to install four across the city with priority for taxis. We could ask how this priority works and how the initiative has gone.

Sources

- [Uber report](#) “Spark! Partnering to Electrify in Europe” published in September 2020 in which Uber committed itself to assisting with the substantial electrification of vehicles in Europe on the Uber app. See Executive Summary p11-19.

- [“The Low Emission Taxi Guide - Helping local authorities implement low emission taxi and private hire vehicle schemes”](#) from the Low Carbon Vehicle Partnership and Energy Saving Trust. Published in 2018. Particularly p16-25.
- “Engaging with the taxi trade - the switch to electric vehicles” a presentation by Paul Nicholls of Brighton & Hove City Council in January 2019. All relevant
- [“Taxi and Private Hire Action Plan 2016”](#) from Mayor for London and Transport for London. See page 11.

TPR11

From: Owen Watkins [REDACTED]
Sent: Thursday, April 29, 2021 10:34 AM
To: Taxilicensing <Taxilicensing@chichester.gov.uk>
Subject: Hackney Carriage/Private Hire Policy Consultation Response

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O.J. WATKINS

[REDACTED] ACE,

DATE : 29/04/2021

Tel: [REDACTED]

Section 20

Only allowing a Hackney Carriage to be licensed up to an age of 10 years could detrimental to the trade for the following reasons.

1) The cost of a brand new Hackney Carriage including interest on a five year finance plan plus a £1000 deposit is about £43,600.00. Thus on a 10 year lifespan this equates to £4,360 per annum just for the vehicle. A lot of current and prospective drivers would find these costs excessive and quite possibly totally unworkable by the time you add in the other standing costs such as Insurance, Road Tax, Rank Permit, Licensing Fees, Tyres and Servicing.

2) With reference to the above there is a real possibility that the Taxi Fleet will shrink. The knock on effect of this would be lack of availability and a lack of WAV vehicles wether they be off the rank or off the phone.

In conclusion I would rather see a London type of system whereby Euro 6, Electric and LPG Conversions have a 15 year lifespan. This would make it more workable for the Trade and keep the supply of taxis and WAV's at a higher level.

[Sent from Yahoo Mail for iPad](#)

LEGAL DISCLAIMER

TPR12

From: Farshad Ahmadian [REDACTED]
Sent: Sunday, May 2, 2021 6:19 PM
To: Taxilicensing <Taxilicensing@chichester.gov.uk>
Subject: Hackney Carriage/Private Hire Policy Consultation Response
Farshad Ahmadian
Tel: [REDACTED]
[REDACTED]

Dear sir

Reference your email of March 1st concerning the changes to the current licensing standards for Hackney Carriage and Private Hire, I have the following comment for your consideration.

I do not agree with the age limits for Hackney Carriage and Private Hire Vehicles as the 10 year limit does not reduce pollution or improve on any safety. An effective and responsible organisation would implement the latest Euro standards for all vehicles especially Euro 6 for diesel vehicles to reduce pollution and improve safety.

An upto 10 year old vehicle could have very high mileage (over 500k) and be unsafe due to the lack of unscheduled testing or inspection. Some Private Hire Vehicles Licenced by CDC are driven in other cities outside CDC area without any regards to conditions or standards set by CDC. They exchange or borrow safety equipments to get through the CDC test and then the are not seen for another year to 6 month depending on their next test schedule.

I also object to the 5 year time limit you have given to all Hackney Carriage Vehicles despite their age or condition. This will have the highest financial impact on some of us especially as our vehicles have recently been purchased to comply with the latest standards set by Transport for London which is higher than CDC. Basically my £25,000 investment is getting the same limit as the £700 investment recently someone purchased from London.

I personally feel that the CDC should have more none schedule road testing, improve on their inspection (no rust, no dent, good paint, no internal tear or defects, ext) or taking a ride in the vehicles instead of a 10 year old age limits across the board. The perfect example of bad cars and drivers under 10 years old are Arun District Council vehicles.

Clean and well presented Cabs and drivers should also be your drive for further improvements like what it used to be in Chichester.

I hope someone will take note of my comments and this email will not be field under "B" for bin!

Kind regards
Farshad Ahmadian
Tel: [REDACTED]

TPR13

From: Jim Rendall [REDACTED]
Sent: Sunday, May 2, 2021 7:48 PM
To: Taxilicensing <Taxilicensing@chichester.gov.uk>
Subject: Hackney Carriage/Private Hire Policy Consultation Response
J Rendall.

[Next](#) [Last](#)

Tel: [REDACTED]

DATE 2/4/21

Section 20

The decision of only allowing a Hackney Carriage vehicle to reach 10 years of age before it can no longer work in Chichester will, in my opinion, be detrimental to the Hackney Carriage trade in the district and, more than likely, bring about an end to "black cabs" in this city. My main 2 reasons for believing this are set out below.

The cost.

To purchase a brand new purpose built taxi, over 5 years with interest payments, would cost somewhere around £43,500.

On a 10 year lifespan, just for the vehicle and NOT including insurance, MOTS, fitness tests, servicing, fuel and tyres, you'll be looking at around £4,350 per year. Add to that the listed items above and driving a black cab becomes VERY expensive, to the point where a new driver joining the trade would have to seriously think whether it is worth it, or have some major cash behind them to start with. And thats not to mention current drivers who will have to upgrade to a new vehicle when theirs reaches the age limit.

The loss of vehicles and drivers and wheelchair access.

With these new regulations in place I believe the number of drivers and vehicles on the road will diminish greatly and will, thusly diminish the number of wheelchair accessible vehicles in the district available for disabled passengers as private hire are not generally "wheelchair friendly." By that I mean there are not many private hire vehicles that a wheelchair can fit into, either with the disabled person still in it or just the wheelchair in the boot. And there are some disabled people who are unable to get out their chairs so these people will be effectively barred from taxis in Chichester.

Conclusion.

In conclusion I believe a better system would be to adopt a London style system whereby Euro 6, Electric and LPG conversions have at least a 15 year lifespan. After that time frame has passed I believe vehicles should be judged individually on their suitability to continue working ie. bodywork, chassis, interior condition. There is no rule that states a driver must stop working at a certain age, as long as he/she can still pass the necessary medical requirements. Why can't a vehicle be treated in the same way? As long as it can pass the necessary mechanical tests, national emission laws and looks neat and tide, no big rust patches etc, why can't it keep working?

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