

Comment

Response

The clause 3.3.1 have an engine producing 50KW or greater is unnecessarily restrictive. The KW of the vehicle affects the range of the vehicle. I would suggest removing clause 3.3.1 completely as for example the latest top of the range Nissan leaf is only 40 KW but previous models of electric vehicles and many others still available are 25KW. Also as a note in true electric vehicles there is no engine as its an electric motor.

Consider 50kw engine output to be adequate. This does not exclude any of the main makes of electric vehicles and believe the author may be confused with the power of the battery.

In clause 3.4.1 the range for the electric vehicle is a minimum range of 112km but in clause 15.1 you are talking about a range of 120 miles. There is some difference between 112km and 120 miles. The range of 112km would be more likely to encourage electric vehicles to be introduced.

Agree this is a sensible change. The range of 112km is as per the Category 1 list of vehicles eligible for government grants.

I understand that licencing are investigating licencing the all-electric Nissan Leaf. Why you are even thinking about this I just cannot fathom. The range on a Nissan Leaf renders it impractical to use as a licenced vehicle. In the winter you will be lucky to get 100 mile range. Maybe they could be licenced for school runs only. P.S. my electric vehicle has a range according to manufactures of 290 miles, in the summer I get maximum of 220, and in winter 190/200 .

If this change is taken up by school run drivers then it demonstrates it is a worthwhile chage to encourage such users to have a vehicle that reduces the impact on air quality.

If they are licenced for only 3 people, how do taxi companies know when a booking is made that there might be 4 passengers. Imagine a Nissan Leaf turning up for a booking with 4 angry passengers expecting to get in the vehicle, I hope the drivers carry plasters.

This change is for Private hire vehicles only and these bookings are managed through an operator that should be able to ensure appropriate vehiocles are sent to bookings.

2.2.2 The current set up in accordance with the council's scheme of delegated officers, we would like to see some changes? The old tried and tested scheme of variations to conditions and other business was firmly placed under the auspices of licensing councillors who at a licensing meeting would either revoke or amend conditions and would cross examine licensing officers with trade representatives present and sometimes members of the public, before a decision was agreed on. This methodology of working whereby dialogue amongst licensing councillors, officers and trade representatives is what consultation is all about. Nowadays decisions seem to be rubber stamped by licensing officers and yet trade representatives and perhaps even councillors can see pitfalls in this way of working. There is definitely a need for some old methods to return.

This is separate to the policy and conditions in relation to taixs and private hire vehicles

3.3.1 We do not know enough about electric vehicles to approve 50kw or greater. At the low emissions taxi incentive meeting on December 12th 2017, questions were raised to Councillor Hammond and SCC officers who could not answer relevant topics connected with electric/hybrid vehicles. For example, particulate matter which could be rubber coming off a tyre, brake dust from asbestos linings - what harm do these have on the general public? - they did not want to answer this question. All they wanted to discuss was hybrid and electric vehicles and how much damage diesel is contributing to Southampton. We of course as an association want the best for the City but we need to understand more before we can approve electric vehicles. So far the information given has not been satisfactory and the infrastructure is not in place.

3.4.1 The licensing department appear to have crossed wires, they seem to know about M1 specification vehicles under category A, but they have failed to mention an IVA test carried out by VOSA. IVA is an Individual Vehicle Approval, it concerns rear loading vehicles that have a ramp for the disabled. This test can cost as much as £300 and the vehicle has to be booked in at a Vehicle and Operator Services Agency (VOSA) approved building by VOSA certificated officers.

Also under category 3.4.1 and 3.4.2, our opinion is although these categories should remain, there should be no age limit on any vehicle. When a vehicle is over two years of age, we have to have two MOT's (Ministry of Transport) One carried out by a MOT Garage and the other is the Annual Compliance Test undertaken by Adams Morey. We feel that this is sufficient, especially as we have vehicles working in Southampton from different areas with none of the requirements we as operators have to undertake.

The use of asbestos in UK vehicles was outlawed in 1999. Wear from vehicle tyres and brake linings can generate particulates but emissions from exhausts are far more significant in terms of the volumes generated and their nature i.e. it's the combustion process which is responsible for generating the very small particles associated with health impacts. In addition, because of the regenerative braking technology and automatic gearbox used on EV's their emissions from wear and tear will be relatively lower than that generated by traditional combustion powered vehicles.

The IVA is one and often the only route to demonstrate a vehicle is M1 compliant.

To remove the age limits would in our opinion be a backward step and counter productive with regards air quality. Vehicle testing records show older vehicles are more likely to fail the mechanical inspection.

We also want for the hackney carriages to have any colour and internal vehicle CCTV should be voluntary and not part of our conditions and certainly not at the price we have to pay. With the advent of Uber vehicles working in our City, as I have already stated (from other areas) this corporate colour of white has no significance whatsoever. The safety factor that comes with this colour ruling set in the year 2000 under the Local Transport Plan no longer exists. We are as a trade self funding. Our licensing department is also in charge of the Eastleigh private hire and taxi trade who also have the colour white. There is now no need for us to wait weeks for the colour white, certainly when a vehicle is brand new and a different colour is available on the forecourt.

6.1 We would like to be allowed to advertise on the full size of the complete rear window of our vehicle. The advert could be for a third party or a taxi company. This type of advertising is called contra vision, where you can still see out of the rear window.

12.1 We have not had a fare increase since 2014, so why should we have an annual test on the meter, as written in our conditions? Enforcement should check meters when they enforce?

20.1 The licensing office need to be more diligent who is the owner of vehicle and whose name is on the Identification Plate?

Uber have changed how they operate and we have changed the knowledge test for private hire drivers. Both of these changes have reduced the number of out of area vehicles. There is still evidence the cameras are necessary with 3 drivers in 2016 losing their licence on the strength of evidence from the cameras. The corporate colours and markings provide safeguards for the public and were used by the Mayor of London in his report to the Transport minister.

Suggest wording in 6.1.2 is changed to "Advertising, including third party products and services, etc. shall be permitted (subject to conditions and law) on any part of the body of the licensed vehicle. Advertising on vehicle windows is restricted to the rear and side rear non opening windows and must either be evenly perforated over 50% of the film to allow vision out of the vehicle or comply with 6.1.1

Agreed and is what the change proposes

This change requires the relevant people to make contact before any transfer is completed so licensing officers are aware of who has an interest in licensed vehicles

Much the same as hackney carriage conditions, age limit to be abolished, IVA certification and we would vehemently disagree to a private hire vehicle to carry three passengers as suggested in the letter dated 17th January 2018.

As above regards age and IVA. Market forces and practicality of a three seater vehicle will determine if and how many are licensed.