

Paul Holliday

Subject: FW: [WARNING EXTERNAL] Feedback on proposed emissions policy for licensed vehicles

From: respondent 1

Sent: Thursday, June 29, 2023 2:59 PM

To: Licensing <licensing@epsom-ewell.gov.uk>

Subject: [WARNING EXTERNAL] Feedback on proposed emissions policy for licensed vehicles

To licensing people

I am not happy your thinking to put ulez in epsom and ewell area am disabled with Adptation to my car and will NOT change or readapt another car just to suit ulez my neighbours on road as diesel car with young family can't afford to change there car we will NOT change our cars to suit the pollution everyone in epsom cars are in good condition I service n mot my car every year and it pass my neighbours service n mot her car every year she 3 young kids there a lot on my road got old cars and on cornet road with classic cars or old diesel cars u putting stress on disabled n young family trying to force us to update our car to suit the coverment it is worse we in epsom imprisonment out of london n inner london now u want us to feel more imprisonment putting ulez camera up I speed on behafe or my neighbours and epsom NOT to take our freedom away by putting the ulez camera up and makeing us pocketless we will not change our car and we all stand agent ulez on Facebook so don't take our freedom away Many thanks

respondent 1

 pdfelement

Paul Holliday

Subject: FW: [WARNING EXTERNAL] Taxi rank

From: respondent 2

Sent: Tuesday, July 11, 2023 11:59 AM

To: Licensing <licensing@epsom-ewell.gov.uk>

Subject: [WARNING EXTERNAL] Taxi rank

Hi just letting you know, not all vehicles will be suitable replacement taxi at Epsom because must wheelchair access vehicles load from the back and this would be no good in a taxi rank for obvious reasons ..

[Sent from Yahoo Mail on Android](#)

 pdfelement

Paul Holliday

Subject: FW: [WARNING EXTERNAL] Taxi meeting

From: respondent 2A
Sent: Monday, July 24, 2023 9:41 PM
To: Licensing <licensing@epsom-ewell.gov.uk>
Subject: [WARNING EXTERNAL] Taxi meeting

The best thing to do for the Epsom taxi service in my experience is to follow T F L ,everything is done to meet the country's clean air policy, if you want to drive a car work for UBER,and what 5 drivers would you let have a car? Would the cars be allowed in bus lanes?they are not London taxi.

As for other wheelchair accessible vehicles most of them only load from the back so this would be no good in a taxi rank...(there is no space between the taxi to load the wheelchair)and again there's the bus lane problem..After the ULEZ ,TFL is going to move to road charging when Epsom council stopped shadowing TFL..a good few years ago,all the drivers kept there old taxis because they could, some of the drivers have bought new taxi to do school runs in,the older drivers in there mid 70s don't want to get new taxi because they ony want to work for a year or so..they are only thinking of themselves not the future of taxi in Epsom...so there you have it in a nut shell... thank you respondent 2A

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Paul Holliday

Subject: FW: [WARNING EXTERNAL] Feedback on proposed emissions policy for licensed vehicles

From: respondent 3

Sent: Tuesday, July 11, 2023 11:53 PM

To: Licensing <licensing@epsom-ewell.gov.uk>

Subject: [WARNING EXTERNAL] Feedback on proposed emissions policy for licensed vehicles

I think the plans look excellent and would be a great step for local health as well as helping in some small way to fight climate change.

respondent 3 (a local resident and taxi user)

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Paul Holliday

Subject: FW: pho consultation: Emissions restrictions for taxis and private hire

From: respondent 4

Sent: Wednesday, July 12, 2023 8:14 AM

To: Licensing <licensing@epsom-ewell.gov.uk>

Cc: Keith Baxter-Russell <keith.baxterrussell@surreycc.gov.uk>

Subject: [WARNING EXTERNAL] RE: pho consultation: Emissions restrictions for taxis and private hire

Hi Paul,

Many thanks for the email.

You did pre-warn me that this proposal was in the pipeline, so appreciate the heads up.

I have also copied Keith Baxter-Russell into this reply, Keith is our contracts Manager at Surrey County Council and this could obviously have a major impact on how Home to School Transport is provided in the Borough.

It potentially has a major impact on our business and also our owner drivers.

We also forwarded this proposal onto all of our drivers, asking for feedback and any points they would also like raised.

We'd appreciate if the below points could be taken into consideration and would ask that we can get some answers to the questions raised please.

Business View

Currently 12 out of 29 of our fleet vehicles aren't compliant (2 are exempt) this is around 32% of our fleet and 50% of these non-compliant vehicles are made up of 7/8 seater buses that are used to transport SEN children on home to school transport contracts.

6 new 7/8 seater buses start in the region of £40,000 plus, this is a potential outlay of at least £240,000.

Not only will this have a major impact of the financial side of the business in replacing these vehicles, it could also impact those children within Surrey in providing transport for them.

6 new vehicles start in the region of £20,000 plus, this is a potential outlay of at least £120,000.

The financial impact this would have on not only our business but also those owner drivers, is frightening.

Surely drivers will give up this job, leading to less licensed vehicles on the road, less revenue for the Borough and those that do purchase vehicles then job prices would have to increase

Owner Drivers View

I'm very worried if i need to purchase any new vehicle. If managed to get hire purchase for a new vehicle it would be another big amount i would have to find monthly and not guaranteed my school run to be returned the following year could put me in a very difficult position.

If purchasing an electric vehicle ,living in a 1st floor flat would be unable to charge the vehicle again costing me money and time

My present vehicle is MOT tested twice a year passing emission requirements serviced every 8000 miles

Remove Watermark Now

Whilst I understand the reasoning behind the emission reduction I think they need to give you/us more time
There just aren't the vehicles available to buy new or used for every non-compliant vehicle to be replaced and the prices are extortionate

The waiting lists for new vehicles is months and there are few suitable vehicles being produced now, none of the mainstream manufacturers build a people carrier anymore, they do make 7 seat SUVs but these don't afford the space required for our additional needs children . This will result in more vehicles being needed to take the ever increasing number of children to school resulting in more vehicles on the road more emissions (although lower per vehicle) more cost, more school parking ,more drivers PA s etc and will the council pay for this and have the infrastructure in place in the proposed time scale ?

In theory what is proposed is a good idea but the practicality of rolling this out in 18 months is unrealistic if not impossible

I certainly cannot afford to purchase a new vehicle and run it in the current situation and I doubt I am alone so this may result in many drivers giving up and seeking alternative employment so where will SCC get drivers from to take our children to school

With the cost of living and council cutbacks I can't see how this proposal is affordable

Questions

1. What is Chris Grayling view on this proposal? Mr Grayling is an advocate supporter of local businesses and must be concerned on how this change will impact all local businesses.
2. Are Epsom & Ewell Borough the only one participating in this or are all other local Borough's looking to do this?
3. What are the current emissions pollution levels in the Borough?
4. Will a scrappage scheme be implemented for those vehicles not compliant? If not, why not.
5. The TFL position was based on statistics regarding air pollution and alleged effects on health. Where is the information that highlights the problem in the Borough, it's full of greenery, has no heavy industry and no excess deaths due to respiratory disease. If it has, where are the figures, what is the source?
6. No one bought these vehicles with the intent of polluting the planet, they were bought in good faith as a means of earning a living. The common denominator between the vehicles and the owners is age, they are both getting on in years. Why not let these vehicles come to the end of their useful work lives, which will more than likely coincide with the owners retirement. In other words the new regulations apply to new owners/drivers or new vehicles, this will enable the current owners to slip into history gracefully.
7. Do they have any data on the number of vehicles affected? If not, why not?
8. Will there be more charging points be put into the Borough?

Look forward to hearing back from you.

Many thanks,

respondent 4

Paul Holliday

Subject: FW: Feedback on proposed emissions policy for licensed vehicles

From: respondent 5

Sent: Saturday, July 15, 2023 7:48 PM

To: Licensing <licensing@epsom-ewell.gov.uk>

Subject: [WARNING EXTERNAL] Feedback on proposed emissions policy for licensed vehicles

Don't agree with this proposal, it'll be the thin end of the wedge. As to political promises not to expand the requirement to all vehicles, I've yet to see any political promise outlast the next election.

respondent 5

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Paul Holliday

Subject:

FW: Response from Surrey Coalition of Disabled People

From: Yasmin Broome <yasmin.broome@surreycoalition.org.uk>

Sent: Monday, July 17, 2023 5:10 PM

To: Paul Holliday <PHolliday@epsom-ewell.gov.uk>

Subject: [WARNING EXTERNAL] Response from Surrey Coalition of Disabled People

Hi Paul

Further to our meeting on Friday here is the response from our members to the consultation.

1. Many wheelchair users prefer rear entry vehicles to side entry due to the gradient of the ramp and wheelchair control.
2. Most councils now ask drivers to pass a BTEC Course before being given a license – this applies across the Board. We think Epsom and Ewell Borough Council should also implement this.
3. Vehicles should take powered wheelchairs but some refuse.
4. Rear entry vehicles available - just a couple of examples Citron Berlingo Peugeot Partner Renault Kangoo Peugeot Van Side entry.
5. The members present felt the proposal for 5 electric vehicles not to be wheelchair accessible is appalling – wheelchair users want to be part of the future and have the right to be. Disabled people are taxpayers too therefore they should be able to access all services.
6. When licencing taxis for wheelchair use, if only a manual wheelchair user can be carried, the rating should be different from a fully accessible vehicle which would carry all types of wheelchairs and especially powered wheelchairs. Only those willing or able to carry powered wheelchairs should be given the All Accessible rating.
7. To find an address by a taxi driver, especially for rural areas, use What 3 Words. It will take you to a 3 metre square either at the end of a driveway or the entrance door, whichever is most appropriate.
8. Clamping points and seat belts in taxis. All chairs must be clamped into the vehicle using the clamping points on the chair. If the driver is unsure of the clamping points as some of the rear clamping points are a single bar to which two clamps are fitted.
9. Only webbing clamps should be used, never metal ones.
10. Assistance Dogs or other assistance animals (as not only dogs are used for assistance) to be carried without a fuss. The passenger should not be left behind and made to either miss an appointment or made to feel humiliated and degraded by the experience. It must be made clear that refusing Assistance animals is against the law.

11. It would be good for a central point for reporting taxi issues, so that these can be addressed as well as seeing if there is a trend in one particular area or another.

Kind regards

Yasmin

Yasmin Broome

Involvement Lead



Mobile: [07455 267424](tel:07455267424)

Office: [01483 456 558](tel:01483456558)

Web: surreycoalition.org.uk

Address: Surrey Coalition of
Disabled People
Astolat, Coniers Way,
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Paul Holliday

Subject: FW: Meeting at Town Hall to discuss proposed emissions policy

From: respondent 7

Sent: Sunday, July 23, 2023 3:51 PM

To: Licensing <licensing@epsom-ewell.gov.uk>

Subject: [WARNING EXTERNAL] Re: Meeting at Town Hall to discuss proposed emissions policy

To Paul Holliday

I attended the meeting regard the changes to the Taxi 's on Epsom rank. You have not given us very much notice, also you have not offered any help to the drivers to update their taxis. At the meeting we were told that Epsom was one of the worst areas for pollution I would like to see proof of this claim. We were also told that all other areas where also bring in theses changes. I have been to Leatherhead Taxi rank at Leatherhead Station and spoken to one of the Hackney Licensed drivers. He has heard nothing about a changes being implicated by Mole Valley Council. This leads me to think you are just railroading these changes with no thought to how the drivers are going to afford them. There have been Black London Taxis n Epsom rank as long as i can remember and I am in my seventies.

Yours Sincerely

respondent 7

 pdfelement

Paul Holliday

Subject: FW: [WARNING EXTERNAL] Epsom Council Taxi Proposals

From: respondent 8
Sent: Wednesday, July 26, 2023 4:45 PM
To: Licensing <licensing@epsom-ewell.gov.uk>
Subject: [WARNING EXTERNAL] Epsom Council Taxi Proposals

Paul

Thank you for instigating the consultation at Epsom Town Hall on Friday 21st July 2023 regarding the proposed alterations to the qualifying status of PHV and HC vehicles, hopefully it will be constructive and be given due consideration, unlike the ULEZ debacle under the auspices of TFL.

Firstly the information that the council have used as a criteria was not readily available unless requested, I would like to think that this is an oversight, not a deliberated attempt at obfuscation, not everyone is computer literate or has English as a first language.

Early on in the meeting the question was raised on the amount of emissions regarding the number of affected PHV & HC in proportion to the amount of privately owned or commercial vehicles in the borough. The answer was 'insignificant'. Let me emphasise that again, emissions proportionally 'insignificant'.

It was brought to our attention that other Surrey boroughs had more stringent environmental standards than EEBC, but nothing was verbally mentioned about the four boroughs, two of which border ours, that have no emissions guideline, these could continue to operate in the borough with impunity I imagine? In fact I could register my vehicle, get an operators and drivers licence in Runnymede and Tandridge and carry on as usual, which would mean that EEBC received zero income from me, but my capacity to operate was unhindered. I would be astonished if I was the only one in this position.

There is a general feeling that we are the subject of victimisation. No proposals for restrictions of privately owned vehicles (one way to lose an election), businesses of all types from florists to builders to distribution, all gleefully go about their business day to day totally unaffected by this, so the inevitable question is 'why us', and the glaring obvious answer is, 'because we can'.

So what we have is a relatively small number of people within the borough will have their livelihoods compromised to achieve an 'insignificant' effect on the overall well being of the borough's population to appease the councils wish to be seen to be Green. It is noted that no scrappage scheme is envisaged and no restrictions are to be imposed on vehicles entering the borough so 'Why us?' Is a more than relevant point.

I appreciate that EEBC wishes to emulate sister boroughs in having a similar climate friendly agenda, but surely the framework should be spread to encompass more than one small part of the local economy? If need be, perhaps Surrey County Council should instigate a generic code, but they are a bit busy challenging ULEZ in the High Court, never the less, worth thinking about.

Nobody bought their vehicles with the intention of polluting the planet or endangering children's lives, in fact we were actively encouraged by the government of the day to purchase diesels as they were deemed to be more environmentally friendly. To replace my Vito as an electric car with the same specification as I have now would be in the region of £55,000, we won't go into range limitations or charging points. Petrol and Euro 6 variants are a premium price wise and availability is meagre, the rules of supply and demand have seen to that. Please let me know how someone with a high mortgage or extortionate rent, with two kids, in the middle

of a cost of living crisis is going to be commit to that level of finance? Giving a grace period would be seen as a hollow gesture, unless it's accompanied by a general economic upturn.

I shall state at this point that these circumstances are not my own, I am in the twilight of my working life, but that does not stop me being concerned for future generations.

The impact of these measures being implemented in their present form would see an increase in unlicensed vehicles, a not inconsiderable reduction in licensed PHV and more out of borough vehicles operating within the confines of Epsom and Ewell. This will reflect in a lack of service to borough residents and that blame will be placed squarely at the councils feet. Naturally, if there are less vehicles to license, it will mean less income, which could result in examination of staffing levels within the appropriate departments.

Having made my points as succinctly as possible, I appreciate that the council needs to be seen to be aware of the climate situation, so therefore I would respectfully suggest that instead of the current proposals, which I believe I have highlighted the drawbacks, the following criteria was used as a framework for discussion.

From 1st January 2024, all vehicles newly registered as PHV must be Euro Six Compliant

From 1st January 2024 any new driver shall not be permitted to work past the age of 76.

From 1st January 2024, no vehicle registered as a PHV will be able to operate more than 15 years after its initial registration date at the DVLA.

Any drivers or vehicles currently registered operate as they do currently until one or the other retires. Any current driver who upgrades/changes his vehicle has to adhere to the new guidelines.

What this would achieve would be clarity for any new driver and a condition for current drivers and vehicles to be accommodated until they retire or the car does, it also give companies some leeway in planning for the future.

It's a proposal, date and numbers can be changed, caveats may be needed to be introduced, but hopefully I have managed to convey the depth of concern this has caused and offer a suitable alternative for debate?

Await your reply with interest, we may only be taxi drivers, but we provide an essential service within the borough and are resentful at being picked on, just because we can!

Thanks for your time and please confirm receipt of this email by return.

respondent 8

Paul Holliday

Subject: FW: [WARNING EXTERNAL] Taxi Emissions

-----Original Message-----

From: respondent 8A
Sent: Sunday, July 30, 2023 8:53 PM
To: Licensing <licensing@epsom-ewell.gov.uk>
Subject: [WARNING EXTERNAL] Taxi Emissions

Paul, I am having a problem with my iPad, for some reason it keeps crashing the keyboard, no doubt I am doing something wrong, but could you please ignore the last email I sent as a reply to yours and just use this one as a reference? That's if you received it, I'm not sure what happened to be honest!

Paul

Thank you for replying and apologies for the delay in getting back to you, I have just returned from a family holiday.

The context in which it was spoken was in direct reference to the amount of CO2 emissions generated by the general public to that generated by EEBC PHV's. The answer was 'insignificant', I am sure that's in the minutes of the meeting or you can always seek clarification from others present. I know it's not easy speaking to an audience from personal experience and total recall is a rare gift, but I think in this instance I am correct.

You asked for suggestions and alternatives and I have tried to form a basis for discussion, not a series of hard and fast rules, the suggestion that the higher standard was instituted on vehicle compliance was earlier than in your proposals was to horse trade for the longevity increase in vehicles presently.

Perhaps I am missing a trick, but I fail to see how our vehicles going into an area of another local authority has any relevance to the standards that are being proposed for Epsom.

I am aware that it is illegal to discriminate on the basis of age, you did mention in your address that some drivers continued into their nineties, this I would imagine is a very small number and in my proposals the vehicles would cease to function years before then and cost considerations would make vehicle purchase highly unlikely.

Let me state at this point that there is no personal advancement for me on these proposals, in fact the first point would move things forward a year for me, it's the overall injustice, lack of meaningful consultation and lack of thought that concerns me most.

If you find yourself unable to present any of the proposals to the relevant council committee I am more than willing to do it myself.

Once again, thanks for the opportunity and apologies for the delay in replying, but it is still within the deadlines stipulated.

respondent 8A

Paul Holliday

Subject: FW: Meeting at Town Hall to discuss proposed emissions policy

From: respondent 9

Sent: Thursday, July 27, 2023 11:34 AM

To: Licensing <licensing@epsom-ewell.gov.uk>

Subject: [WARNING EXTERNAL] FW: Meeting at Town Hall to discuss proposed emissions policy

To whom it may concern,

I am writing in response to the recent proposals regarding changes to emissions standards for vehicles licensed by Epsom and Ewell Council.

We at x are committed to improving the emissions produced by our vehicles both through more efficient transport planning and renewing our fleet of older vehicles.

We have successfully operated our first EV minibus on a regular school route, something we are investigating more proactively now to assess operational viability. Unfortunately EV minibuses are not suitable for many of our routes currently due to distances involved and drivers having suitable charging facilities. With this in mind, we are still heavily reliant on traditional diesel combustion engine minibuses.

Having assessed our current fleet of vehicles, numbering 288, we have produced a list of vehicles based on category, that would not meet the new Euro 6 standard. I am sorry to say that it is a rather large list, mostly as a result of difficulties in the supply chain "post Brexit" and "post COVID". As an example, we placed an order for 10 brand new, standard spec, Renault Traffic 8 seater MPV minibuses last November (2022) which we still have not received. In fact, we are not likely to see the first one until this September and the rest from October onwards.

What I am pleased to report however is that the majority of our vehicles in the relevant category are Euro 5 and above. We are currently prioritising replacement of the older Euro 4 models.

Based on currently identified vehicles (52) not meeting the Euro 6 standard I can confirm the following:

1. Total replacement cost to new like for like models – approx. £1.5 million – this is simply not affordable given the multitude of financial challenges facing businesses in the UK and in particular transport operators.
2. Even if we were able to fund these new vehicles, there simply is not enough time given delays in manufacturing and supply.

In short, we are committed to improving vehicle emissions but would kindly ask for longer timescales to be considered.

Please do not hesitate to contact me if you would like to discuss these points further.

Kind regards

respondent 9

Paul Holliday

Subject: FW: Meeting at Town Hall to discuss proposed emissions policy

From: respondent 9

Sent: Thursday, July 27, 2023 3:32 PM

To: Licensing <licensing@epsom-ewell.gov.uk>

Subject: RE: Meeting at Town Hall to discuss proposed emissions policy

Dear Paul,

With regards to the replacing the Euro 4 vehicles in the relevant category; fortunately we only have 8 of these left on fleet, and plan to replace them all by the end of 2024 at the latest, which is only 6 months beyond your proposed July 2024 target.

As for replacing the remaining vehicles with Euro 6; this is slightly more difficult to pin a definite timeline to. There would be a further 44 in total to replace; the issue we have is that many are still in very good working order, a large number (approx. 25) are from the last year of Euro 5 production. Another big issue is what to do with these vehicles when they are replaced. There is a measurable environmental impact in scrapping vehicles in place of newly produced ones.

In order to answer your question, I can only offer a broad estimate of needing a minimum of 3 – 4 years to replace all relevant vehicles to Euro 6 spec.

Many thanks

respondent 9

Paul Holliday

Subject: FW: Emissions restrictions for taxis and private hire

From: respondent 10

Sent: Thursday, July 27, 2023 4:21 PM

To: Licensing <licensing@epsom-ewell.gov.uk>

Subject: [WARNING EXTERNAL] Emissions restrictions for taxis and private hire

I object to this proposal. Anything that aligns with the London ULEZ is a ridiculous position for the council to take. The impact of the ULEZ on local people and businesses is immense, particularly when it is coupled with the punitive changes to rail fares. To seek to match ULEZ with licensed vehicles is to tacitly agree with and support the ULEZ expansion itself. The 'deaths from pollution' figure is grossly overstated.

Epsom has a reasonable nightlife. This will hit people in the pockets. The cost of new vehicles will be reflected in fare prices and people will go out less or not at all. If you want a ghost of Christmas future take a look at Sutton. Sutton once had small and large nightclubs, a cinema and a range of both independent and chain pubs and restaurants. Epsom isn't booming, but it is starting to recover and is a great place to go out. It won't take much to ruin that. You have already done your best to destroy it with the ridiculous Epsom Station redevelopment and the banishment of black cabs in favour of app-operated big business from out of the area.

Your timeline indicates that, much like the ULEZ, the decision has already been made and the consultation is nothing more than performative art. I would urge you to be really careful as this will lead to a town centre than is anything but 'vibrant' which is, ironically, contrary to the council's own stated key priorities.

respondent 10

Paul Holliday

Subject: FW: [WARNING EXTERNAL] Re: pho consultation: Emissions restrictions for taxis and private hire

From: respondent 11

Sent: Friday, July 28, 2023 1:51 PM

To: Licensing <licensing@epsom-ewell.gov.uk>

Subject: [WARNING EXTERNAL] Re: pho consultation: Emissions restrictions for taxis and private hire

Hi Paul,

I hope you're well.

Thanks for sending this over in regards to emissions.

my industry fits in a unique category being a novelty vehicle. Limousines in this country are all around 14+ years old. Most councils and TFL allow us to be exempt from age related policies and emission related policies.

TFL make exemptions for all existing licensed vehicles and I hope you would adapt the same policy.

My Chrysler limousine is Ulez compliant and does not have to pay but the Lincoln does pay Ulez.

I'm a small business and heavily rely on being able to trade to pay my mortgage, childcare fees and every other bill I have which is quite substantial.

If the policy excluded me from trading it would have a detrimental impact on me and my family's life.

We are a service in high demand, so it would also have an impact on the public who want to use our service for their special occasions.

I look forward to hearing back from you in due course.

Thank you.

Kind regards,

respondent 11

Paul Holliday

Subject: FW: [WARNING EXTERNAL] ULEZ

From: respondent 12

Sent: Friday, July 28, 2023 4:16 PM

To: Licensing <licensing@epsom-ewell.gov.uk>

Subject: [WARNING EXTERNAL] ULEZ

I object wholeheartedly to a ULEZ style policing of taxis and private hire vehicles in the Epsom and Ewell area. This will only be the beginning to your expanding this to include every vehicle moving in our area.

For Gods sake. We've got Epsom Downs less than a couple miles away. Look to you positions come the next round of local elections.

 pdfelement

Paul Holliday

Subject: FW: Objection to the Ulez PHV vehicles 29.07.23
Attachments: Consultataion.odt

From: respondent 13
Sent: Saturday, July 29, 2023 8:42 AM
To: Licensing <licensing@epsom-ewell.gov.uk>
Subject: [WARNING EXTERNAL] Objection to the Ulez PHV vehicles 29.07.23

Dear Licensing,

I must object to the ulez for PHV.

My objections are in the word document.

Please take these into consideration now surrey cc has lost their Ulez contest in the high court

Kind regards

respondent 13

 pdfelement

1. No Public consultation you have to write to licencing so not being able to put a yes or no answer if you agree with it.
2. The consultation was done at the council in the middle of the day when most people were working so I would imagine it was a poor turnout.
3. A few hundred vehicles being removed will not make a difference to air quality or the climate.
4. Why not make all vehicles subject of Ulez not just PHV.
5. If my car will be stopped being registered for Private Hire, I can still drive my car in Epsom which makes no sense.
6. By 2025 more vehicles will be Ulez compliant so just give the older vehicles an exemption until they are replaced.
7. Allow all of the private Hire vehicles that do school runs for Surrey County Council an Exemption.
8. Additional needs children will have no access to school transport.
9. Lost Revenue to the council.
10. No scrappage scheme.
11. Less vehicles to take older people to Hospital's etc.
12. Drivers and Passenger assistant's out of work.
13. Who makes these decision's.
14. Cost of living crisis
15. People can't afford to replace their vehicles.
16. Epsom and Ewell are against Ulez as in their statement.
17. Epsom is run by the resident's association so it's the public that have the decision in the consultation.
18. Manchester Scrapped Ulez due to the public anger and that is a city not a council trying to get a few hundred vehicles off the road.
19. The U.k is second in the world for meeting target's due to emissions.
20. In Epsom we have clean air, Ulez was brought in to clean up the air in central London.
21. If more people object to the consultation it then needs to be scrapped.
22. As most of the vehicles are registered in Epsom they will still be used if the emissions comes into force.

Paul Holliday

Subject: FW: [WARNING EXTERNAL] ULEZ Expansion for Taxi and Private Hire : Consultation on Proposed Taxi and Private Hire Emissions Policy.

From: respondent 14

Sent: Saturday, July 29, 2023 12:52 PM

To: Licensing <licensing@epsom-ewell.gov.uk>

Subject: [WARNING EXTERNAL] ULEZ Expansion for Taxi and Private Hire : Consultation on Proposed Taxi and Private Hire Emissions Policy.

Dear Sirs

My first concern is that this consultation paper, to the best of my knowledge, was never *really* made public, despite updates from time to time from our local MP. Most of these documents either arrive with just a few days to comment, or, as in this case, is shared by a member of the public who only discovered it at the eleventh hour.

I do not consent to these proposals you have raised in the above proposal, because:

- 1) From impartial reports, it appears that TFL data, from which these proposals have arisen, was misleading and in some cases erroneously represented, based on challenges to ULEZ policies by members of the public.
- 2) The data is not circulated adequately. Why was a notice not sent to every household from early June? I only heard today, and have no time to read the documents.
- 3) The number of businesses which will be forced to close because of the need to buy new vehicles will likely have a severe impact on the economy of the town, as well as on the owners of the vehicles in question and their families.
- 4) This may be an attempt to open the ULEZ tax to privately owned vehicles in the near future. The public is already suffering. Who is really on THEIR side? Who really benefits from these changes?
- 5) What guarantee is there that fares will not rise, to further compromise Taxi and Private Car Hire? The public is wary of U turns. There is little confidence in situations like these. Corporations always seem to take precedence over people.
- 6) We know that electric vehicles are not the answer, in that they are unstable, short lived and have been seen to explode unexpectedly; additionally, some components are very costly, involve illegal child labour and Earth's resources.
- 7) The **stealth** with which these decisions are made, long before there is any public consultation (which invariably misses most of the population by accident or deliberation), is a concern. It is undemocratic and unacceptable.

In hope of betterment, and trusting each of you to look into your hearts, and into the eyes of your much loved children, before you pledge to do your best for the population of Epsom and Ewell, in acting in utmost honour in bestowing the finest legacy of honest, civic representation and a more ethical and open world. Your children will inherit the results of the efforts you make for the people of Epsom and Ewell. Make them the best you can.

Yours faithfully,

respondent 14

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Paul Holliday

Subject: FW: [WARNING EXTERNAL] Response to Consultation on Proposed Taxi and Private Hire Emissions Policy

From: respondent 15

Sent: Saturday, July 29, 2023 4:30 PM

To: Licensing <licensing@epsom-ewell.gov.uk>

Subject: [WARNING EXTERNAL] Response to Consultation on Proposed Taxi and Private Hire Emissions Policy

Dear Sir or Madam

As council taxpayers, we wish to make the following response to the above consultation.

- This appears to be a covert attempt to impose ULEZ policies and conditions by the back door. There are multiple grounds on which to subject these policies to significant challenge, including the highly questionable data on which they have been based, and the fact that the mayor of London disgracefully ignored the results of the poll in which the majority of respondents disagreed with the expansion of the ULEZ zone.
- We have no reason to be confident that identical conditions will not be imposed by EEBC on private vehicles at any point, regardless of whether the ULEZ zone officially expands to encompass surrounding counties or not. In other words, we see this as potentially the 'thin end of the wedge'.
- There is a serious risk that these measures will prove unaffordable for taxi and private hire operators, resulting in a raft of negative repercussions such as business closures, fewer vehicles being available and the ultimate inevitability of fare hikes that would be unaffordable to the average user. This will affect pensioners, the disabled, late night train passengers and have a detrimental, possibly terminal, effect on Epsom's pubs, restaurants and clubs.
- What risk assessments regarding the above at-risk groups have been carried out prior to these proposals? We are not informed.
- In no way are we reassured by the answer to the final question in the Q+As, that there are 'no additional increases to the fare chart planned'.
- We are concerned about any coercion of taxi and private hire operators to rely increasingly on electric vehicles. We fundamentally disagree with the notion that electric vehicles are 'green', notwithstanding any issue of emissions. We are still heavily reliant on fossil fuels for electricity and any serious investigation into this issue leads to the inescapable conclusion that this is not likely to change any time soon, regardless of the government's net zero goals. In addition, the government's goals for establishment of electric charging points are fully ten years behind schedule. We do not currently have the grid capacity to service a significantly expanded network of charging points, even if this were not the case. Electric vehicles also carry a risk of combustion and there are extremely concerning ethical and humanitarian issues regarding the mining of lithium for batteries.
- Finally, we find extremely disturbing the secretive and underhanded manner in which this consultation has been launched and run with absolutely no publicity whatsoever. This is wholly unacceptable. Consultation on new policies that affect a town's population is a council's **statutory duty** and under these conditions it has **not** been adequately or appropriately carried out. This falls woefully short of the standards required from publicly funded and accountable bodies.

Yours faithfully
respondent 15

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Paul Holliday

Subject: FW: [WARNING EXTERNAL] Feedback on proposed emissions policy for licensed vehicles

Importance: High

From: respondent 16
Sent: Saturday, July 29, 2023 4:30 PM
To: Licensing <licensing@epsom-ewell.gov.uk>
Subject: [WARNING EXTERNAL] Feedback on proposed emissions policy for licensed vehicles
Importance: High

Dear Sir/Madam,

I had not heard about this consultation until late yesterday when three friends separately informed me of it by email. All three had also not heard of the proposal until yesterday. I've heard nothing about it at all from EEBC. No email, no leaflet, no letter through the post and no public notices as far as I can see. Two people I spoke to in my building this morning had heard nothing about it either. I imagine there are many more. I do not have time today or tomorrow to write a properly considered objection. I demand that the deadline is extended by at least another 30 days so that everyone in the borough has time to consider and respond. Considering the public uproar caused by the ULEZ it is essential that everyone in the borough is fully and properly informed asap preferably by all four methods described above. And why not host a public debate on local radio! In the meantime I have read the proposal and object to it.

I look forward to hearing from you that the extension has been granted!

Regards,

respondent 16

Paul Holliday

Subject: FW: [WARNING EXTERNAL] Licensing consultation

From: respondent 17
Sent: Saturday, July 29, 2023 11:19 PM
To: Licensing <licensing@epsom-ewell.gov.uk>
Subject: [WARNING EXTERNAL] Licensing consultation

I discovered this consultation paper through a friend, who knows that I am against the ULEZ expansion for many reasons. I am wondering why it has not been made more publicly visible? As it is for the residents of Epsom and Ewell to give their views, surely a bit more advance warning would be useful so there are a greater range of views to consider. A leaflet delivered to all residents with the details of this proposal would have been a better idea so people can deliberate and have time to share their views.

I do not consent to these proposals you have raised in the consultation document because:

- 1) There is some doubt over the data taken from TFL for this proposal as there are legal challenges going through the courts with conflicting data given by impartial sources.
- 2) The number of taxis which could be forced to close because of the need to buy new vehicles will likely have a severe impact on the economy of the town, as well as on the owners of the vehicles in question and their families. It seems to me to be an easy way to raise income. To benefit whom?
- 3) The proposal states that there are no plans to raise fares. What guarantee is there that this will be the case? The public is wary of U turns. There is little confidence in situations like these. Corporations always seem to take precedence over people.
- 4) We know that electric vehicles are not the answer, in that they are unstable, short lived and have been seen to explode unexpectedly, causing dangerous fires. The components are very costly, involve illegal child labour and are not easily recycled/not recyclable.
- 5) These decisions seem to be made with little regard to the public/electorate. It is undemocratic and unacceptable. I am concerned that this is a precursor to adopting the ULEZ within our borough. This will damage already struggling businesses and trade in the town and therefore the public.

I hope you will consider the above points raised. The people of Epsom and Ewell deserve better from their council. Transparency, honesty and the best, ethically made decisions for the benefit of the whole borough, not the coffers of the council.

Yours

respondent 17

Paul Holliday

Subject: FW: [WARNING EXTERNAL] ULEZ Expansion for Taxi and Private Hire : Consultation on Proposed Taxi and Private Hire Emissions Policy.

From: respondent 18

Sent: Sunday, July 30, 2023 1:41 PM

To: Licensing <licensing@epsom-ewell.gov.uk>

Subject: [WARNING EXTERNAL] ULEZ Expansion for Taxi and Private Hire : Consultation on Proposed Taxi and Private Hire Emissions Policy.

Dear Sir/Madam

I was only made aware of this consultation by chance on Friday and I am surprised that there has been so little publicity about it. ULEZ is a highly contentious issue and there are many ways this expansion proposal could have been brought to local people's attention - yet I don't know of anyone else in the area who was aware of the consultation either! Which makes me question the integrity of the process. Have you really had a chance to find out what local people think? Or has the decision already been made and this exercise is just a whitewash to give the appearance of the public's involvement, with an artificially created, inevitably low response rate appearing to show apathy and lack of interest which are then taken to imply consent?

Either way, please register my **opposition to these proposals** to introduce new emissions' standards for taxis and licensed vehicles in Epsom and Ewell, for the following reasons:

1. Where are the studies to show that air quality in Epsom and Ewell are of concern? I have not seen any that prove this to be the case. I have lived in the Epsom area for over 16 years without ever hearing about or experiencing air pollution at dangerous levels. Who has provided these details? Have they been checked by an impartial third party and confirmed as accurate? I would like to see evidence to support your assertions that these measures are needed at all. It seems to me that the suggestions you propose may relate to a different situation, being rolled out through stealth.
2. There is no scientifically credible evidence to show that forcing 'non-ULEZ-compliant' cars off the road will have any impact on improving local air quality or the health of local residents
3. There is no evidence that has been made public which shows that cars and taxis of a certain age produce any significant impact on the air quality in Epsom and Ewell (while there is plenty of evidence to show that the air quality is consistently good without such proposed draconian measures).
4. Most people whose cars do not meet the ULEZ criteria are at the lower end of the income scale. These are the people least able to afford to upgrade their vehicles - particularly in the current financial climate where mortgages, utilities and general cost of living have all sky-rocketed in the last year. These unjustifiable proposals will be the final straw for many local people and could see them go out of business, thus causing severe financial, emotional and mental hardship. I do not agree that it is worth risking the well-being of such people in order to allegedly 'improve the health' of other local residents - there really needs to be an honest cost/benefit analysis undertaken here.
5. Those driving 'non-compliant' taxis or private hire vehicles who cannot, or choose not to, scrap them (a hideously wasteful exercise in itself and not at all 'environmentally friendly', wouldn't you say?) will potentially be forced to drive further out to get work, thus cancelling out the so called benefits of banning them from the Epsom and Ewell area. Or is it OK to 'pollute' other areas?
6. In the same way that many people oppose the ULEZ being extended to the entire outer London area, the evidence to justify banning older vehicles, purely based on ULEZ 'standards', is lacking credibility and at best has been manipulated to force the most vulnerable and financially challenged out of their cars and onto an unfit-for-purpose public transport system.
7. I am extremely concerned, despite your reassurances, that this is a thinly disguised attempt to introduce ULEZ to all motorists who drive into and out of the local area, by stealth.

This whole process is deeply flawed and anti-human. I find it incredible that no concern is being given to the impact it will have on the lives and livelihoods of hard-working taxi and private car hire drivers and businesses, whose vehicles are perfectly viable, MOT-certified and well maintained. Larger companies can swallow costs of regularly upgrading their vehicles and typically have fleets of new, leased cars. Your proposal targets small businesses and sole traders, making it virtually impossible for them to compete with larger organisations, and threatening their survival. How many local people right now can afford the additional cost of a 'new' car? We should be encouraging, not penalising, small businesses. They make up a vital aspect of our community and should be supported to compete with large corporations, particularly since they are much more likely to contribute to the local economy than bigger companies.

In conclusion, I am wholeheartedly opposed to the imposition of any coercion on taxi and private hire vehicles to conform to these unrealistic and unreasonable measures. I believe they will have extremely adverse consequences for sole traders, small businesses, local residents, and the local economy. Your proposals will also threaten the survival of private transport both locally and across the country. I have no doubt that if this proposal is adopted, it will be a stepping stone to rolling out ULEZ-type measures onto the wider population, impacting not only the poorest among us, but also the most entrepreneurial, on whom our local community depends. Without sole traders and local small businesses who may well be forced out of the area or put out of business entirely, larger corporations will corner the local taxi and private car hire market and will be able to dictate prices, potentially raising them out of the range of local people, thus affecting shoppers, children needing to get to and from school, patients needing to get to the hospital, women travelling safely late at night, people attending family gatherings, social functions and more. This is contrary to the council's duty to safeguard the best interests of the local community, and is totally unacceptable for a so-called inclusive society.

Yours faithfully
respondent 18

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Paul Holliday

Subject: FW: ULEZ Expansion for Taxi and Private Hire : Consultation on Proposed Taxi and Private Hire Emissions Policy.

From: respondent 18A
Sent: Tuesday, August 1, 2023 11:56 PM
To: Licensing <licensing@epsom-ewell.gov.uk>
Subject: Re: ULEZ Expansion for Taxi and Private Hire : Consultation on Proposed Taxi and Private Hire Emissions Policy.

Dear Paul Holliday

Thank you for your reply.

Even if the 6% figure is correct (which is far from conclusive) where are the studies that prove any causation by non-ULEZ compliant cars specifically? We should question everything associated with these figures and make sure they have been independently verified before rolling out draconian measures such as those suggested in this consultation.

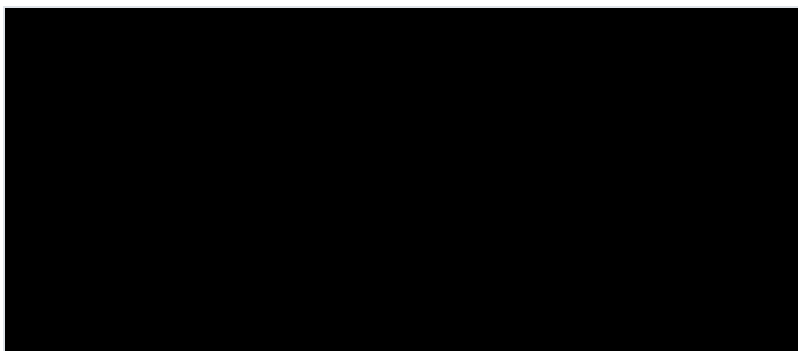
As you have noted, the (alleged) mortality attributed to 'particulate air pollution' does not specify how much, if any of this, pollution is due to the incredibly small number of older taxis and hire cars in the borough. I would challenge the assumption that they are 'obviously a significant contributor' - again I would want to see how these conclusions have been drawn as they relate to EEBC directly. It is worth noting that cause of death attributed to particulate air pollution would be a very difficult thing to prove - particularly, I suspect, in cases where the deceased likely had one or more co-morbidities.

FYI there are some interesting points made [here](#) about PM2.5 levels decreasing significantly over the last 10+ years which would seem to indicate there is currently no crisis to be averted.

As for the second point you reference, I would say it is greatly to EEBC's credit that you/they have thus far resisted the pressure to comply to measures being enforced by other local councils. Councillors are representatives of their immediate community and not beholden to the policies implemented by other boroughs. I believe that if you encourage more people to give their opinion on this matter and publicise the consultation properly and effectively, with actual data, you would find a large number of local residents would be strongly opposed to taxi drivers and small car hire businesses being held responsible, and carrying the burden, for any alleged air pollution in the area. We should stand with councils like Sutton who are opposed to any forced ULEZ expansion as they understand the severe ramifications it will have on the poorest among them.

At the very least, I believe more time should be allowed for the consultation to be conducted and an honest representation of local people's views sought. No coercion should be applied to taxi drivers or car hire firms to upgrade their cars so long as they are MOT compliant in line with all other road users.

regards
respondent 18A



Particulate matter (PM10/PM2.5)

On Monday, 31 July 2023 at 16:16:29 BST, Licensing <licensing@epsom-ewell.gov.uk> wrote:

To scapegoat and penalise the relatively tiny number of taxi drivers whose cars are not emissions compliant is insanely unfair and disproportionate



Paul Holliday

Subject: FW: [WARNING EXTERNAL] Feedback on proposed emissions policy for licensed vehicles

-----Original Message-----

From: respondent 19

Sent: Sunday, July 30, 2023 3:51 PM

To: Licensing <licensing@epsom-ewell.gov.uk>

Subject: [WARNING EXTERNAL] Feedback on proposed emissions policy for licensed vehicles

As a resident of Epsom and Ewell I find the proposal of making licensed vehicles ULEZ compliant unacceptable. Many taxi firms in the area will not be able to afford new vehicles. They will go out of business leaving it even more difficult for the vulnerable to access transport within the borough.

Fares will inevitably go up as it is always the customer who has to foot the bill in the end. Many of the elderly and disabled who could afford one or two trips out a week will no longer be able to budget for this. They will become prisoners in their own homes. I doubt any council members are living from hand to mouth and have no concept of how difficult life can be for those who are.

Taxis outside the borough will refuse fares that take them into the borough if their vehicle is not ULEZ compliant making it difficult for residents to get home from hospital visits etc.

I do not think taxis and licensed vehicles being compliant with ULEZ is going to make much, if any, impact on traffic pollution in our borough. Has there been studies to investigate this? Please may any studies you may have done be made public the residents.

Yours sincerely respondent 19

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