
Cooke, Lesley

Subject: FW: Proposed License Changes - response to proposed TL policy consultation**From:** John**Sent:** 13 April 2016 22:47**To:** taxi.licensing@york.gov.uk**Subject:** Proposed License Changes

Dear Sirs/Madams

My apologies for the lateness of this letter, your initial letter concerning the proposed licensing changes was never sent out and the replacement letter I had to request via phone was received late. I am aware this letter is been sent after the deadline, I would appreciate if this letter was included for consideration before or in the meeting, if the letters aren't able to be presented, please can you make me aware via a phone call so I can seek legal advice concerning the points below.

I have read the proposed changes to the license conditions online which unfortunately took a lot of finding and many attempts to download and open. My interest was on the environmental aspects of the changes and also section 7.5. I would like clarification on this section as to why an "insurance write off" vehicle would not be suitable to be a licensed Private Hire or Hackney Carriage. This section is important to me and my son as we both run a fleet of vehicles.

It is to myself and my sons understanding that if a vehicle is "written off", but deemed repairable, then the vehicle can be repaired and used again. If the vehicle is too badly damaged to be returned to the road then it is classified as a category 'A' or 'B' and is solely used for spares or total destruction. All of the other categories e.g 'C' 'D' are all repairable. The categorization does not realistically reflect the actual damage to the vehicle, it is reflected on vehicle age and residual value - i.e a 2007 Mondeo requiring two doors can be classified as a Cat 'C' but a 2014 Mondeo with more damage would be repaired by the insurance company. It is deemed viable even though the actual damage would be more severe. A vehicle maybe damaged - but not subject to a claim i.e Third Party. The vehicle would not be recorded as a "write off" but still could be easily repaired and put back on the road.

I currently have a 2009 vehicle with full service history and just over 50,000 miles which is a Cat 'C'. It only requires a replacement engine. Structurally the vehicle is as it left the factory. I've had licensed vehicles that have required an engine change which if taken to a main dealer could be classed as an equivalent insurance write off. Likewise, if an owner/driver damages his or her car and doesn't submit an insurance claim but still repairs it themselves, would you know if the vehicle had been repaired to the standards required or at all?

If an insurance write off is fully repaired, taken for an MOT, passes, is then inspected by the council testers (like many cars have been before), this surely meets the levels of safety for a vehicle to be legally used on the road and licensed?

As has become apparent, I have particular interest on these changes as I run a fleet of plated vehicles, most of which are insurance written off vehicles. This proposed change is of huge concern to my son David, who runs a smaller fleet of vehicles along side me and I fear that with this change we would not be able to afford to replace the cars as frequently as we would like to. This would ultimately affect the emission standards that are proposed, as the vehicles would now be kept on longer. These proposed changes would surely affect numerous drivers who may not be able to afford to change vehicles to meet the new standards.

My apologies again for the lateness of this reply, due to having difficulty in actually finding and downloading the proposed changes.

Yours faithfully

John Hay

Cooke, Lesley

Subject: FW: Proposed changes to PH and HC VL - response to proposed TL policy consultation

From: David Hay

Sent: 13 April 2016 23:02

To: taxi.licensing@york.gov.uk

Subject: Proposed changes to PH and HC VL.

To whom it may concern.

First of all, I wish to apologise for the late reply, my Father and I did not receive the initial letter dated back in February, I had to ring and request a replacement which was delivered late. If these points are able to be included in the consultation meeting, I would be very grateful, if not then please can I request a phone call along with a call to my Father to say they aren't going to be included so we can make enquirers with a solicitor.

I write regarding the recent amendment to the Hackney Carriage & Private Hire Licensing Policy, particularly Section 7.5, which excludes vehicles declared an "insurance write off" from becoming licensed vehicles.

I have built up my business, York Private Hire Rentals, over the past 10 years, offering mechanical services, including general repairs and sales of restored vehicles. However, the bread and butter of my business is the hiring of vehicles to be used as taxis. My fleet of 20 cars is almost exclusively made up of former Category C & D insurance write offs. The proposed changes to the policy would cripple my business.

The vehicles I provide are restored to a high standard in terms of appearance, roadworthiness and safety; my wife drives our 17 month old daughter in such a vehicle. My cars have all been put through MOT and taxi testing and are maintained with regular servicing every 2-3 months. I can assure you, based on my time in the mechanic profession and on my intimate knowledge of each of these vehicles, that they are safe, if not safer, than most cars currently on the road.

There exist many misconceptions about vehicles declared "insurance write offs". Often these vehicles are only very slightly damaged. Categorisation of such vehicles reflects relative costs and not necessarily the degree of damage. A new expensive car with dents to two doors may be assessed as being worthy of repair, whereas an older less expensive car with identical damage might be written off, purely because the residual value in the vehicle doesn't warrant the cost of repair. These categories are not a fair reflection of the final roadworthiness of a restored vehicle. Furthermore, if a driver chooses not to claim on his insurance following a collision, his car is left uncategorised and may be repaired and resold without declaring damage. Such vehicles would not be captured by your proposed changes.

If you have concerns relating to the environment, please consider the sustainable credentials of my business model. Viable cars are restored and reused rather than scrapped, saving on waste and the production of new vehicles. By using Category C and D vehicles I am able to offer newer, lower mileage, less polluting cars than I might otherwise be able to afford, reducing both emissions and uptake of parts, as newer vehicles require less input to maintain. All of this adds up to a greener, less polluted and more environmentally conscientious York.

Additionally, my business model benefits the city of York by keeping costs low. I purchase less expensive vehicles, restore them at cost, and pass on the savings to my customers, the taxi drivers. These reduced overheads make it possible for taxi drivers to subsist on low rates set by their companies. Lower taxi rates are better for their customers, especially tourists, and what helps to boost tourism helps boost our city.

York Private Hire Rentals is a small, family firm. We provide vital automotive services to the people of York and are proud to be part of the economy of this city. Without taxi rentals, the backbone of this business – and disallowing written off vehicles would make the future of that enterprise cost prohibitive – my business will most certainly fold.

I therefore write in hopes to persuade you to please reconsider the proposed changes to this policy.

Thank you very much for your time.

Yours sincerely,

David Hay