

# Agenda

## Scrutiny Committee

This meeting will be held on:

Date: **Tuesday 11 November 2025**

Time: **6.00 pm**

Place: **Long Room - Oxford Town Hall**

**For further information** please contact:

Celeste Reyeslao, Scrutiny and Governance Advisor

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## Committee Membership

Councillors: Membership 12: Quorum 4 substitutes are permitted.

Councillor Alex Powell (Chair)

Councillor Mike Rowley (Vice-Chair)

Councillor Mohammed Altaf-Khan

Councillor Mohammed Azad

Councillor Tiago Corais

Councillor Chris Jarvis

Councillor Dr Amar Latif

Councillor Katherine Miles

Councillor Edward Mundy

Councillor Simon Ottino

Councillor Asima Qayyum

Councillor Anne Stares

Apologies and notification of substitutes received before the publication are shown under *Apologies for absence* in the agenda. Those sent after publication will be reported at the meeting. Substitutes for the Chair and Vice-chair do not take on these roles.

# Agenda

		Pages
1	<b>Apologies for absence</b>	
2	<b>Declarations of interest</b>	
3	<b>Chair's Announcements</b>	
4	<b>Minutes of the previous meeting</b>  The Committee is asked to approve the minutes of the ordinary meeting held on 14 October 2025 and special meeting held on 5 November 2025 as true and accurate records.  <i>Minutes of the Special meeting on 5 November 2025 will be published as a late supplement.</i>	9 - 18
5	<b>Addresses by members of the public</b>  Public addresses relating to matters of business for this agenda. Up to five minutes is available for each public address.  <b>The request to speak accompanied by the full text of the address must be received by the <a href="#">Director of Law, Governance and Strategy</a> by 5.00 pm on Wednesday, 5 November 2025.</b>	
6	<b>Councillor addresses on any item for discussion on the Scrutiny agenda</b>  Councillor addresses relating to matters of business for this agenda. Up to five minutes is available for each address.  <b>The request should be received by the <a href="#">Director of Law, Governance and Strategy</a> by 5.00 pm on Wednesday, 5 November 2025.</b>	
7	<b>Scrutiny Work Plan</b>  The Work Plan is driven to a very large extent by the <a href="#">Cabinet Forward Plan</a> . The Scrutiny Committee agrees its priorities for items coming onto the Forward Plan, which then form part of its Work Plan.	

The Committee is recommended to confirm its agreement to the Work Plan, or agree any amendments as required.

*The Work Plan will be published as a late supplement.*

## **8 Hackney Carriage Vehicle Emission Standards Amendment**

19 - 116

Cabinet, at its meeting on 19 November 2025, will consider a report to consider a delay to the final phase of emission standards for Hackney Carriage Vehicles licensed by this Authority.

Councillor Anna Railton, Deputy Leader and Cabinet Member for a Zero Carbon Oxford, Richard Adams, Community Safety Service Manager, Anna Dumitru, General Licensing Team Manager, and Joshua Curnow, Supervising Senior Licensing Officer have been invited to attend and respond to questions.

The Committee is asked to consider the report and agree any recommendations.

## **9 Cabinet responses to Scrutiny recommendations**

117 -  
122

At its meeting on 22 October 2025, Cabinet considered the following reports from Scrutiny and made responses to the recommendations:

- Anti-Social Behaviour Policy
- Annual Safeguarding Report

The Committee is asked to note Cabinet's responses to its recommendations.

## **10 Endorsement of Recommendations from Working Groups**

123 -  
126

Since the Scrutiny Committee's previous meeting, the following Working Groups have met:

- Finance and Performance Working Group (29 October 2025)

Under the delegated authority granted to the Scrutiny and Governance Advisor, the recommendations made by the Finance and Performance Working Group have been forwarded to the Shareholder and Joint Venture Group at their meeting on 6 November 2025, in consultation with the Chair of the Scrutiny Committee.

The Committee is asked to **note** the recommendations from Finance

and Performance Working Group.

## **11 Dates of future meetings**

### **Scrutiny Committee**

- 2 December 2025
- 13 January 2026
- 3 February 2026
- 10 March 2026
- 7 April 2026

**All meetings start at 6:00 pm.**

## **Information for those attending**

### **Recording and reporting on meetings held in public**

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The Chair of the meeting has absolute discretion to suspend or terminate any activities that in his or her opinion are disruptive.

### **Councillors declaring interests**

#### **General duty**

You must declare any disclosable pecuniary interests when the meeting reaches the item on the agenda headed "Declarations of Interest" or as soon as it becomes apparent to you.

#### **What is a disclosable pecuniary interest?**

Disclosable pecuniary interests relate to your\* employment; sponsorship (ie payment for expenses incurred by you in carrying out your duties as a councillor or towards your election expenses); contracts; land in the Council's area; licenses for land in the Council's area; corporate tenancies; and securities. These declarations must be recorded in each councillor's Register of Interests which is publicly available on the Council's website.

#### **Declaring an interest**

Where any matter disclosed in your Register of Interests is being considered at a meeting, you must declare that you have an interest. You should also disclose the nature as well as the existence of the interest. If you have a disclosable pecuniary interest, after having declared it at the meeting you must not participate in discussion or voting on the item and must withdraw from the meeting whilst the matter is discussed.

#### **Members' Code of Conduct and public perception**

Even if you do not have a disclosable pecuniary interest in a matter, the Members' Code of Conduct says that a member "must serve only the public interest and must never improperly confer an advantage or disadvantage on any person including yourself" and that "you must not place yourself in situations where your honesty and integrity may be questioned". The matter of interests must be viewed within the context of the Code as a whole and regard should continue to be paid to the perception of the public.

#### **Members Code – Other Registrable Interests**

Where a matter arises at a meeting which directly relates to the financial interest or wellbeing\*\* of one of your Other Registrable Interests\*\*\* then you must declare an

interest. You must not participate in discussion or voting on the item and you must withdraw from the meeting whilst the matter is discussed.

### **Members Code – Non Registrable Interests**

Where a matter arises at a meeting which ***directly relates*** to your financial interest or wellbeing (and does not fall under disclosable pecuniary interests), or the financial interest or wellbeing of a relative or close associate, you must declare the interest.

Where a matter arises at a meeting which affects your own financial interest or wellbeing, a financial interest or wellbeing of a relative or close associate or a financial interest or wellbeing of a body included under Other Registrable Interests, then you must declare the interest.

You must not take part in any discussion or vote on the matter and must not remain in the room, if you answer in the affirmative to this test:

“Where a matter affects the financial interest or well-being:

- a. to a greater extent than it affects the financial interests of the majority of inhabitants of the ward affected by the decision and;
- b. a reasonable member of the public knowing all the facts would believe that it would affect your view of the wider public interest You may speak on the matter only if members of the public are also allowed to speak at the meeting.”

Otherwise, you may stay in the room, take part in the discussion and vote.

\*Disclosable pecuniary interests that must be declared are not only those of the member her or himself but also those member’s spouse, civil partner or person they are living with as husband or wife or as if they were civil partners.

\*\* Wellbeing can be described as a condition of contentedness, healthiness and happiness; anything that could be said to affect a person’s quality of life, either positively or negatively, is likely to affect their wellbeing.

\*\*\* Other Registrable Interests: a) any unpaid directorships b) any Body of which you are a member or are in a position of general control or management and to which you are nominated or appointed by your authority c) any Body (i) exercising functions of a public nature (ii) directed to charitable purposes or (iii) one of whose principal purposes includes the influence of public opinion or policy (including any political party or trade union) of which you are a member or in a position of general control or management.

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## **Minutes of a meeting of the Scrutiny Committee on Tuesday 14 October 2025**



### **Committee members present:**

Councillor Powell (Chair)

Councillor Altaf-Khan

Councillor Corais

Councillor Miles

Councillor Ottino

Councillor Rowley (Vice-Chair)

Councillor Azad

Councillor Jarvis

Councillor Mundy

### **Officers present for all or part of the meeting:**

Celeste Reyeslao, Scrutiny and Governance Advisor

Hannah Carmody-Brown, Committee and Member Services Officer

Richard Adams, Community Safety Service Manager

Laura Jones, Safeguarding Coordinator

Simon Manton, Community Response Team Supervisor

Dave Scholes, Affordable Housing Supply Corporate Lead

### **Also present:**

Councillor Linda Smith, Cabinet Member for Housing and Communities

Councillor Lubna Arshad, Cabinet Member for A Safer Oxford

### **Apologies:**

Councillor(s) Qayyum and Stares sent apologies.

Councillor Powell submitted apologies for the first 30 minutes of the meeting and was substituted as Chair by Councillor Rowley at the commencement of proceedings.

### **43. Declarations of interest**

There were no declarations of interest made.

### **44. Chair's Announcements**

There were none.

### **45. Minutes of the previous meeting**

The Committee resolved to **approve** the minutes of the meeting held on 9 September 2025 as a true and accurate record.

#### **46. Addresses by members of the public**

There were none.

#### **47. Councillor addresses on any item for discussion on the Scrutiny agenda**

There were none.

#### **48. Project Approval and Delegations for Westlands Drive and Halliday Hill affordable housing scheme**

Cabinet, at its meeting on 22 October 2025, will consider a report to seek project approvals and delegations for Westland Drive and Halliday Hill affordable housing scheme.

The Committee is asked to consider the report and agree any recommendations.

Councillor Linda Smith, Cabinet Member for Housing and Communities and Dave Scholes, Affordable Housing Supply Corporate Lead, were present to respond to questions.

Councillor Smith presented the report to the Committee, noting that the scheme pertains to land already owned by the housing revenue account and has achieved planning permission. The Committee heard that the scheme is affordable and will include six units for social rent, five for affordable rent, and four for shared ownership; this spread reflects the relative priority given to each of those tenures by the Council. Councillor Smith emphasised that the scheme also responds to the local housing need. Finally, it was noted that the Council has set a target of 1600 new affordable homes in the next four years, of which at least 850 will be for social rent.

The Affordable Housing Supply Corporate Lead informed the Committee that the scheme is currently finalising its tender process, and the contract will be awarded in the coming weeks. The Committee heard that the build stage is expected to commence in April 2026 and will be completed within around 12 months from this date.

The Chair thanked Councillor Smith and the Affordable Housing Supply Corporate Lead and reminded the Committee that should they wish to discuss any information enclosed within the confidential appendix to this item, it would be required to enter private session.

Councillor Miles requested clarification between the distinction of 'low car development' and 'car free development' referenced in the report. The Affordable Housing Supply Corporate Lead noted that only a small number of parking spaces had been designed into the scheme and committed to providing relevant data following the meeting.

Councillor Miles also asked what provision there would be for resident bike parking, recommending that this be considered from the start of the scheme, rather than built in at a later date. The Affordable Housing Supply Corporate Lead noted confidence that bike spaces had been included within the plans and committed to providing this information following the meeting.

Councillor Altaf-Khan clarified the timing of the tendering process with the Affordable Housing Supply Corporate Lead who confirmed the scheme was progressing on time.

Councillor Smith confirmed that two disabled parking spaces were included within the plans, and also an increase in cycling provisions.

The Chair invited the Committee to discuss possible recommendations.

The Committee made no recommendations to Cabinet.

*The Affordable Housing Supply Corporate Lead left the meeting and did not return.*

Following the meeting, the Affordable Housing Supply Corporate Lead provided the Committee with the following information:

- Car parking: There will be two parking spaces available, both designated for disabled users.
- Bike parking: The bike store will provide 28 spaces for the flats (two-tier rack system). The houses will each have a bike shed located in their yard.

## **49. Anti-Social Behaviour Policy**

Cabinet, at its meeting on 22 October 2025, will consider a report to seek approval for the Anti-Social Behaviour Policy.

The Committee is asked to consider the report and agree any recommendations.

Councillor Lubna Arshad, Cabinet Member for A Safer Oxford, Richard Adams, Community Safety Service Manager, and Simon Manton, Community Response Team Manager, were present to respond to questions.

Councillor Arshad presented the report to the Committee, noting that the policy put forward is for approval from 2026 to 2029. The policy supports the Council's efforts to tackle all forms of antisocial behaviour and to fulfil its duties under Section 218A of the Housing Act 1996, as amended by the Antisocial Behaviour Act 2003. It was explained that as a housing provider, the council is required to formulate and publish antisocial behaviour policies and procedures, liaise with local partners, and support tenants to live in safe, clean and well-maintained conditions. Councillor Arshad explained that the policy is reviewed every three years, and the current iteration expires in December 2025. The Committee heard a detailed summary of the Council's principles and service standards in relation to ASB and learned that the policy has been taken through consultation with local communities.

*Councillor Mundy joined the meeting.*

The Community Safety Service Manager clarified that the consultation process began around 12 months ago and noted the useful recommendations it produced which are helping to amend the policy or used to implement it. A broad summary of the consultation response was delivered, and the Community Response Team Manager was introduced.

The Chair invited questions from the Committee.

Councillor Altaf-Khan requested clarity on how the percentages within the report were calculated and asked how action to tackle ASB could be taken more swiftly and directly. He also queried how feedback is obtained.

Councillor Ottino firstly asked how confident the Council is that Registered Providers uphold their responsibilities and perform to expectation in terms of tackling ASB. He also queried how strong the Council's relationship is with the registered providers. It was requested that relevant contact details for the housing associations be shared with councillors. Secondly, Councillor Ottino asked what the Council is doing to coordinate actions against fly tipping with housing associations and ODS. And finally, it was observed that whilst the report focuses on responses to ASB, there needs to be more proactive action taken to decreasing ASB. Therefore, Councillor Ottino asked what more could be done to this end, including considering how to design areas more considerately.

Councillor Corais thanked the officers and asked several questions:

- In reference to the response time targets set out in the report, it was asked what happens when these are not met.
- It was queried what the average duration of an ASB case is, and how these are resolved in a timely manner without compromise.
- Information on mechanisms for escalating unresolved ASB cases was requested.
- Information on how residents are kept informed about ongoing ASB cases was requested.
- It was asked how data is used to identify ASB hotspots and how this is shared with other councils and the community.
- Finally, clarity on how the council publicises the policy and educates residents on reporting and feedback options.

The Community Safety Service Manager responded to the questions. In relation to the duration of ABS cases, the staged process was outlined in detail and the Committee heard that around 2500 cases are reported annually, most of which result from environmental ASB issues. It was explained that around 300 neighbourhood nuisance cases are reported a year, and these are often more complex to investigate; therefore, cases take longer. In response to queries regarding performance, it was explained that all cases are logged, and actions are managed and monitored via an interactive dashboard. Performance and case duration can also depend on evidence and whether a matter must be taken to Court or not. In regard hotspots, the Community Safety Service Manager explained that the Council uses a database to map regions of ASB activity and works closely with other partners and ODS on this intelligence; they also have access to police and CCTV data. The Committee heard that these multiple data sets can then be overlayed to support analysis of hotspots. The Committee also heard extensive detail of other metrics needed to report on the Social Housing (Regulation) Act 2023 Consumer Standards. In response to Councillor Ottino, it was noted that contacts for the registered providers can be provided to councillors, however these bodies do not have the same local capacity as the Council for tackling ASB. It was emphasised that building relationships with other parties such as social landlords, is an ongoing process. In regards coordination with ODS around fly tipping, the Community Safety Service Manager confirmed that this does take place and recognised that work to designing-out related hotspots could be expanded, but that officer time is already designated to this. The Community Safety Service Manager also recognised the Council's work with the Targeted Youth Support Service and Youth Ambition Team as

means of discouraging ASB. The Committee also learned that regular liaison with the police is ongoing. In regards timely closure of cases, the Community Safety Service Manager explained that supervisors monitor this, however in order to close a case, the Council liaises with the complainant and seek a resolution.

In relation to the length of ASB cases, the Community Response Team Manager explained that many factors influence this, and the Council does aim to keep each case to no more than 3 months. He also reiterated that this can be more complex in some cases and supported the ongoing work with ODS regarding fly tipping and data collection.

The Community Safety Service Manager, in relation to how the public can report ASB, outlined the multiple options which exist and explained that these are publicised via the internet, social media, leaflets, and newsletters, for example. It was also recognised that internal officers must be aware of reporting mechanisms and that a generic email inbox is available for ASB reports: [saferoxford@oxford.gov.uk](mailto:saferoxford@oxford.gov.uk). Finally, the process that a complaint follows after being reported was outlined in detail.

*Councillor Powell joined the meeting.*

Councillor Miles requested clarification around the reporting of ASB between the Council and housing associations and asked where the responsibility lies. It was asked whether the Council could be more proactive in addressing housing associations which are failing their duties to residents. Secondly, Councillor Miles asked what the obligations are for the Council and housing associations to advertise their complaints processes, and whether there is an issue with double reporting when residents do not know where to send their concerns. Finally, regarding fly tipping, Councillor Miles queried whether data from ODS is overlayed with HMO licensing data in order to address occurrences of ASB, and also asked what liaison occurs with universities regarding ASB.

Councillor Jarvis, in recognition of the demographics of Oxford and the populations which speak English as a second language, asked what information regarding ASB is currently publicised in different languages, and what languages these are. Secondly, it was asked why the Equalities Impact Assessment suggested no adverse impacts of the policy when much of the evidence shows that certain demographics are more likely to be accused of ABS and face sanctions. Councillor Jarvis asked how the council reflects this and mitigates against institutional racism in the way they handle ASB complaints and reporting.

The Community Safety Service Manager responded to questions. In relation to registered providers, the Committee heard that the Council works closely with them to manage complaints and can investigate where a complaint is best directed upon receipt. Extensive detail was outlined regarding processes relevant to this, and the importance of ongoing multi-agency work was emphasised. The Committee also learned of the detail regarding an ongoing review into the use of a noise reporting app, and that an officer is dedicated to this workstream. In response to queries regarding the use of HMO data, the Community Safety Service Manager confirmed that this is used to connect complaints to individuals. In regards working relationships with the universities, the Committee were informed that the Community Safety Service Manager meets with relevant security teams every Monday morning to discuss any issues affecting students and the local communities. It was also noted that contact details for

these staff could be obtained for councillors. In response to Councillor Jarvis' question, the Committee learned that work is done to ensure that language provisions are in place for ASB systems, including the translation of letters and notices. However, it was also acknowledged that more could be done. In regards the Equality Impact Assessment, the Community Safety Service Manager noted that he is not aware of evidence to suggest that certain groups are being unduly targeted, however he committed to checking this.

The Community Response Team Manager noted that in addition to weekly meetings with the universities, he also attends monthly sessions with Oxford University's crime prevention officers and weekly sessions with Oxford Brookes University.

Councillor Powell, in response to Councillor Jarvis' earlier question, also queried what is being done to tackle the issue of ASB complaints being made against those from the LGBTQ community, and other communities disproportionately affected by homelessness as a result of their social positionality. In regards the Equalities Impact Assessment, Councillor Powell requested clarification around category two listed on page 40 in relation to sex working and sexual acts; clarification of the phrase 'sex acts' was requested.

Councillor Ottino queried what is being done to ensure ODS workers report ASB when they witness it, and to ensure that ODS staff exhibit a zero-tolerance approach to matters such as fly tipping.

In response to Councillor Powell, the Community Safety Service Manager explained that it is challenging for the Council to gather sufficient data on personal and protected characteristics as people often do not disclose such details. The Community Safety Service Manager assured the Committee of his confidence in supervisors amongst the team in raising these issues if they perceived it necessary. Information regarding support for homeless persons was also detailed to the Committee. In response to Councillor Ottino, the process for reporting fly-tipping was explained and the Community Safety Service Manager committed to discussing the matter of zero-tolerance with ODS.

The Chair invited the Committee to consider possible recommendations.

The Committee resolved to make the following recommendations to Cabinet:

- 1) For Officers to explore the feasibility of gathering and analysis of data on protected characteristics of both: individuals complained about through the ASB service, and individuals making complaints through the ASB service. Recognising that some data may be limited in validity, that findings from the collected and analysed data be reported back to the Scrutiny Committee at an appropriate time within the next two years.
- 2) That officers set out within the Policy the work the Council is currently undertaking and plans to undertake in relation to proactive prevention of ASB, including actions such as working with youth groups, redesigning areas, and improving coordination between council services.
- 3) That there is a clear commitment within the ASB Policy to work collaboratively with Registered Providers in addressing anti-social behaviour, including requesting information from local RPs on levels and types of ASB reports received within their housing stock. This information can then be used to identify



patterns, overlaps and gaps between council and RP data, and reporting back on the efficacy of this partnership working and health of relationships with RPs as part of the Council's wider multi-agency approach to ASB management.

The Chair thanked the Community Safety Service Manager, the Community Response Team Manager, and Councillor Arshad.

*On the conclusion of this item, Councillor Powell took over as Chair for the remainder of the meeting.*

## **50. Annual Safeguarding Report**

The Community Safety Service Manager has submitted the Annual Safeguarding Report to note the key achievements of the Safeguarding work delivered through Oxford City Council during 2024/25.

The Committee is asked to consider the report and agree any recommendations.

Councillor Lubna Arshad, Cabinet Member for A Safer Oxford, Richard Adams, Community Safety Service Manager, and Laura Jones, Safeguarding Coordinator, were present to respond to questions.

Councillor Arshad presented the report to the Committee, noting that it outlined the work which has occurred across the Council over the last year. She also emphasised that in response to the corporate leadership team's recognition of the potential impact on staff welfare of managing safeguarding concerns, a training package is being developed to support staff. Furthermore, Councillor Arshad noted that the staff safeguarding questionnaire saw another year of high responses rates and this was used to inform the action plan. Details of ongoing partnership and multi-agency workstreams were summarised. Finally, the Committee heard that My Concern reports have doubled in the last year and the quality of reporting and recording has increased significantly, demonstrating continued improvement to the safeguarding services at Oxford City Council.

The Chair invited questions from the Committee.

Councillor Altaf-Khan expressed concern over the effectiveness of so many multiagency workstreams and therefore asked how confident the Council is that it is dealing efficiently with the voluntary sector. It was asked how much control the Council has in these relationships.

Councillor Jarvis asked, in relation to pages 110 and 111 of the report, whether there is more detail available which would enable comparison to previous years in order to allow the Committee to assess progress. It was requested that this be included within future reports.

Councillor Miles queried the data relating to heat alerts and emergency accommodation to ask whether some data could be made available to enable comparisons of this over time. She also queried whether this could be linked to the budget that the Council makes available. Secondly, it was asked whether any ward specific data was available in relation to youth ambition interventions to demonstrate where these are occurring.

Finally, Councillor Miles noted concern with issues being passed between County and City Council and therefore asked whether officers are aware of any feedback loops.

In regards to ensuring the voluntary sector play their role in safeguarding, the Community Safety Service Manager explained that the legal structures which exist to work with relevant organisations in the voluntary sector, and Members were assured that whilst not every aspect is within the Council's control, they do as much as possible. It was also clarified that previous concerns raised by the Committee in relation to the lack of safeguarding policies within voluntary organisations grant funded by the Council has now been addressed.

The Safeguarding Coordinator also confirmed that now, every grant-funded organisation has a safeguarding policy in place but also acknowledged the scenarios in which the Council has no control. The Committee also learned that as part of the Oxfordshire Safeguarding Adults Board, subgroups meet, and voluntary organisations are encouraged to attend these meetings. It was emphasised that safeguarding is everyone's responsibility and staff are encouraged to report matters should they arise.

In response to Councillor Jarvis, the Community Safety Service Manager also noted that data can be brought forward from previous years to enable comparison and explanation of why reporting statistics can fluctuate was provided. In response to Councillor Miles, it was also confirmed that information on the funding for SWEP could be obtained and reported back to the Committee.

*Councillor Jarvis left the meeting and did not return.*

Councillor Miles emphasised that residents must be reassured that reports are managed adequately and do not disappear. In response, the Community Safety Service Manager clarified the referrals process, and the Safeguarding Coordinator noted that the Council may not receive a response from the Adult Social Care department at Oxfordshire County Council for a number of reasons. Members were assured that these are followed up on and if a response indicates that the threshold for a referral has not been met, then the Council explores other options through its multi-agency risk assessment process. If the threshold for a referral is met, then an inquiry is opened, and the case is allocated to a social worker. The Committee were assured that Council officers are encouraged to follow up and escalate matters when necessary.

The Chair asked, in reference to page 109 and recent local political context, whether safeguarding support services for asylum seekers, refugees and migrants have been impacted. The Community Safety Service Manager noted his observation of the multi-agency meetings which support the Holiday Inn in Oxford currently housing these groups, and the conversations which have been ongoing. The Committee heard that it is high on the Council's agenda to ensure service users are supported and assurance was provided that the necessary processes are in place.

The Chair offered his anecdotal understanding of the situation, and Councillor Arshad provided further information on actions recently taken by the Council.

The Chair emphasised the need for the Council to provide support for these vulnerable communities and thanked officers for their work continued towards this.

The Chair invited the Committee to discuss possible recommendations.



The Committee resolved to make the following recommendations to Cabinet:

- 1) That future Safeguarding reports provide comparisons with previous years data to allow monitoring of trends and assessment progress, particularly data in relation to modern slavery and exploitation, and severe weather emergency protocol (SWEP). Where the data allows for trend analysis, that previous statistics be included to enable a year-on-year comparison and evaluation of changes overtime.

The Chair thanked Councillor Arshad, the Safeguarding Coordinator, and the Community Safety Service Manager.

*Councillor Arshad, the Safeguarding Coordinator, the Community Safety Service Manager, and the Community Response Team Manager left the meeting.*

## **51. Scrutiny Work Plan**

The Scrutiny and Governance Advisor informed the Committee that the upcoming special meeting on 5th November will consider the Council's Local Government Reorganisation proposal, and the ordinary meeting on 11 November will consider the Hackney Carriage Emissions Standards Reports. The Committee were invited to make suggestions for other items they may wish to consider, including the introduction of Uber which had been previously suggested. The Committee were reminded that it would be necessary to consider the scope of any possible discussion.

The Chair reminded the Committee that any item brought forward in relation to Uber would be for information only. It was clarified that the Committee would not be able to make any recommendations on the topic as Uber is a private company.

Councillor Miles noted that the General Purposes Licensing Committee had considered these issues recently, and therefore recommended that a briefing, as opposed to formal report, may be more useful.

Councillor Altaf-Khan requested that information on Uber and private hire vehicles be brought forward as a formal report alongside the Hackney Carriage Emissions Standards report to the meeting on 11 November.

The Chair, Councillor Miles, Councillor Altaf-Khan, and Councillor Ottino debated this matter.

The Chair recommended that a formal report on Uber not be requested, but that the Committee may be provided the same information on the matter that had already been presented to the General Purposes Licensing Committee

Councillor Ottino queried why the content of the 5 November meeting was not an all-member briefing instead, to which the Chair explained that the report would be going to Cabinet the following week and therefore the Scrutiny Committee was invited to consider it as part of the usual governance chain.

Councillor Mundy suggested that the Scrutiny Committee consider the Council's debt recovery procedure as a future item. The Scrutiny and Governance Advisor noted this.

The Committee **agreed** the work plan.

**52. Cabinet responses to Scrutiny recommendations**

The Chair presented the report on recommendations.

The Chair referred the Committee to the responses enclosed within the report and noted that 9 recommendations had been taken to Cabinet, 6 of which were agreed, 2 of which were partially agreed, and 1 which was commented on.

The Chair requested any questions or comments from the Committee; there were none.

The Committee **noted** Cabinet's responses to its recommendation.

All recommendations from the last meeting were agreed.

The Committee noted the report.

**53. Endorsement of Recommendations from Working Groups**

The Chair informed the Committee that since their lasting meeting, only the Finance and Performance Working Group had met.

The Scrutiny and Governance Advisor noted that the Finance and Performance Working Group met for the first time on 11 September 2025 and discussed three items but made no recommendations.

The Chair noted that there were no recommendations to endorse.

**54. Dates of future meetings**

The Chair reminded the Committee that the next special meeting of the Committee will take place on 5 November 2025.

The Committee **noted** the dates of future meetings.

**The meeting started at 6.00 pm and ended at 8.08 pm**

**Chair .....**

**Date: Wednesday 5 November 2025**

*When decisions take effect:*  
*Cabinet: after the call-in and review period has expired*  
*Planning Committees: after the call-in and review period has expired and the formal decision notice is issued*  
*All other committees: immediately.*  
*Details are in the Council's Constitution.*

**To:** Cabinet  
**Date:** 19<sup>th</sup> November 2025  
**Report of:** Deputy Chief Executive, Citizen and City Services  
**Title of Report:** Hackney Carriage Vehicle Emission Standards Amendment

Summary and recommendations	
<b>Decision being taken:</b>	To consider a delay to the final phase of emission standards for Hackney Carriage Vehicles licensed by this Authority.
<b>Key decision:</b>	Yes  <a href="#">Issue details - Hackney Carriage Vehicle Emission Standards   Oxford City Council</a>
<b>Cabinet Member:</b>	Councillor Anna Railton. Deputy Leader, and Cabinet Member for a Zero Carbon Oxford
<b>Corporate Priority:</b>	Strong, Fair Economy; Thriving Communities; Zero Carbon Oxford.
<b>Policy Framework:</b>	

Recommendation(s): That Cabinet resolves to:	
1.	Approve the removal of the current hackney carriage emissions standards requirement that all new and renewal HCV applications must meet the Ultra-Low Emissions Vehicle standard by 1st January 2026.

Appendix No.	Appendix Title	Exempt from Publication
Appendix One	2019 GPL Committee Report	No
Appendix Two	2024 GPL Committee Report	No
Appendix Three	COLTA request for policy delay	No
Appendix Four	2025 Affordability and Emissions Report	No
Appendix Five	Equality Impact Assessment	No

## Introduction and background

1. On 23<sup>rd</sup> January 2019 the General Purposes Licensing (GPL) Committee approved the recommendation to introduce new emission standards for hackney carriage vehicles (HCV) licenced by this Authority, to reduce emissions in the taxi fleet and improve air quality in the City.
2. It was acknowledged that Oxford City centre has high levels of toxic nitrogen dioxide, which contributes to diseases including cancer, asthma, stroke and heart disease; and, to around 40,000 deaths in the UK every year.

The 2019 GPL Committee report can be found at **Appendix One**.

3. On 5<sup>th</sup> February 2024 the GPL Committee approved an amendment to the emission standards for HCVs, by extending the final phase of the standards, requiring all new and renewal HCV applications to meet ultra-low emission vehicle (ULEV) standards from 1<sup>st</sup> January 2026 (previously 1<sup>st</sup> January 2025). This report included a public consultation.
4. On 18<sup>th</sup> March 2025, the recommended extension was further debated at full Council, who subsequently voted to approve it.

The 2024 GPL Committee report can be found at **Appendix Two**.

5. The current HCV emission standards, as adopted by the Council are:

Date From	Renewal HCV Applications	New HCV Applications
Renewal – 1st January 2020  New – Immediately	All HCV must meet EURO 4 emission standard	All HCV must meet EURO4, EURO 6 or ULEV emission standard.(EURO 5 vehicles will not be considered to meet this standard)
1st January 2022	All HCV must meet EURO 4 emission standard	All HCV must meet ULEV standard, *or at least Euro 4 if replacing an existing Euro 4, Euro 5 or Euro 6 due to the vehicle being written off by an insurance company or is a temporary courtesy vehicle due to repairs
1st January 2026	All HCV must meet ULEV standard	All HCV must meet ULEV standard

6. As of September 2025, 40 out of 107 licensed hackney carriage vehicles have transitioned to meet the ULEV standard, along with 3 out of 4 currently licenced temporary vehicles. This means 67 licensed HCVs and 1 temporary vehicle still need to upgrade to meet the ULEV standard from the 1<sup>st</sup> January 2026.

### **General Purposes Licensing Committee – September 2025**

7. On 22nd September 2025, a report on this matter was presented to the GPL Committee who asked questions and considered answers from Officers in the Licensing Team. In addition, there were two public addresses to the Committee and these were also considered.
8. After considering everything before them the GPL committee agreed a postponement of the final phase until the establishment of a new unitary council under the Local Government Review, aligning the policy with wider structural changes and enabling consistent standards across the new licensing authority.
9. The full recording of the Committee can be found at <https://www.youtube.com/watch?v=l3cHDNrRRWk> 1:17:55 – 2:23:50

### **City of Oxford Licensed Taxicab Association (COLTA) request**

10. On 11th April and 22nd July 2025, the City of Oxford Licensed Taxicab Association (COLTA) formally requested that the Council postpone the final phase of the Hackney Carriage Vehicle (HCV) emission standards, currently set for implementation on 1st January 2026, by an additional two years, extending the deadline to 2028. COLTA cited the following reasons in support of their request:
  - Financial hardship.
  - Impact of the evolving private hire trade.
  - Uncertainty regarding hackney carriage quantity control.
  - Local infrastructure challenges, including road closures and delays to the Zero Emission Zone.
  - Uncertainty regarding local government reorganisation.

A copy of this request can be found at **Appendix Three**.

### **Affordability and Emissions**

11. To support making an informed decision, the Environmental Sustainability Team produced an updated report examining key factors affecting the hackney carriage market. The report explores:
  - The affordability of electric hackney carriages, including ownership and running costs.
  - The impact of reduced government grants, rising energy, and borrowing costs.

- Comparative cost scenarios between electric and diesel vehicles.
- Emissions reductions achieved since the introduction of licensing standards.
- Implications of Zero Emission Zone (ZEZ) charges and delays to its expansion.

A copy of this report can be found at **Appendix Four**.

### **Oxfordshire policy comparison**

12. Oxford City Council is leading the way for low emission hackney carriage vehicles, with the current requirement of ULEV standard from 2026.

South Oxfordshire District Council & Vale of White Horse District Council aim for zero-carbon by 2030 but currently only require Euro 6 by 2026.

Cherwell District Council sets a later ULEV deadline of 2030 for new applications, and 2033 for renewals.

West Oxfordshire District Council has no formal ULEV requirement at present.

### **Local Government Reorganisation**

13. The Local Government Reorganisation (LGR) will reshape Oxfordshire's council structure, with implementation expected in 2028 following a shadow authority period, with three unitary models proposed.
14. Based on March 2025 County wide data, a single Oxfordshire-wide authority would license approximately 1,068 hackney carriages, an increase of 898% compared to Oxford City alone. A two-unitary model would create one authority with around 332 vehicles (Oxford City, Cherwell, West Oxfordshire), an increase of 210%. A three-unitary model is less precise due to the boundary proposal, but estimates suggest a Greater Oxford fleet of 300–350 vehicles, an increase of 180–227%.

### **Conclusion**

15. Cabinet is asked to consider the future implementation of the final phase of the Hackney Carriage Vehicle (HCV) emission standards in light of several key factors.
16. The City of Oxford Licensed Taxicab Association (COLTA) has formally requested a two-year extension to the current policy deadline, citing financial hardship, market change from the private hire trade, infrastructure challenges, and uncertainty surrounding future regulation. COLTA emphasises that while many vehicle owners have already transitioned, further time is needed to ensure a fair and sustainable shift for the remaining fleet.
17. The Environmental Sustainability Team has provided an updated assessment of the hackney carriage market, exploring affordability, emissions reductions, and the impact of government grants and energy costs. Their findings confirm that significant progress has been made in reducing emissions, but also highlight the increasing financial pressures faced by vehicle owners, particularly those without access to home charging.

18. The Local Government Reorganisation adds further complexity. Regardless of which unitary model is adopted, there will be a significant increase in the number of vehicles within the new licensing areas that do not currently and will not meet Oxford City's ULEV standard. Aligning these standards will be a priority for the shadow authority, and any decision taken now will have implications for the future policy alignment.

19. Cabinet is invited to consider the alternative options:

**A. Maintain the current policy**

Retain the existing implementation date of 1st January 2026, requiring all new and renewal HCV applications to meet the Ultra-Low Emissions Vehicle standard.

**B. Extend the deadline by one year**

Amend the policy to defer the final phase by 12 months, setting a new implementation date of 1st January 2027, allowing additional time for transition while maintaining momentum towards the Council's environmental objectives.

**C. Remove the current hackney carriage emissions standards requirement that all new and renewal HCV applications must meet the Ultra-Low Emissions Vehicle standard by 1st January 2026. This matter would be considered by a new unitary council set up under the Local Government Review.**

Officers recommend option **C**.

### **Financial implications**

20. The updated financial implications on the hackney carriage trade are outlined in the affordability and emissions report found at **Appendix Four**.

### **Legal issues**

21. The Local Government (Miscellaneous Provisions) Act 1976 at sections 47, 48 and 51 allows the Licensing Authority to attach to vehicle licences such conditions as it considers 'reasonably necessary'. Improving standards in vehicle safety, and air quality are relevant factors in this respect.

### **Equalities impact**

22. The equality impact assessment identifies that the current Hackney Carriage Vehicle (HCV) emissions policy will primarily affect vehicle owners and licence holders. Any extension to the implementation date would provide financial relief to those who have not yet upgraded their vehicles to meet the Ultra-Low Emissions Vehicle (ULEV) standard, currently 67 vehicles. However, such an extension may result in a financial disadvantage for early adopters of ULEV vehicles, currently 40 vehicles, who have already made significant investment in compliance.

A copy of the equality impact assessment can be found at **Appendix Five**.

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**To:** General Purposes Licensing Committee  
**Date:** 23<sup>rd</sup> January 2019  
**Report of:** Head of Community Services  
**Title of Report:** Licensed Vehicles Emission Standards

Summary and recommendations	
<b>Purpose of report:</b>	To recommend introduction of emission standards for Hackney Carriage Vehicles and amend the vehicle age limit for Private Hire Vehicles licensed by this Authority
<b>Corporate Priority</b>	Vibrant Sustainable Economy, A Clean and Green Oxford
<b>Policy Framework</b>	Air Quality Action Plan, Low Emission Strategy, Sustainability Strategy
<b>Recommendations:</b> That the General Purposes Licensing Committee resolves to:	
1. <b>Approve</b> the recommended option for introduction of new emission standards for Hackney Carriage Vehicles licensed by this Authority; 2. <b>Approve</b> the recommended amendment to vehicle age criteria for licensing of new Low and Ultra Low Emission Private Hire Vehicles; 3. <b>Agree</b> that such proposals be recommended to Council for adoption.	

Appendices	
Appendix 1	Supporting Measures
Appendix 2	Full Analysis

### Introduction and background

- Oxford City centre currently has high levels of toxic nitrogen dioxide, which contributes to diseases including cancer, asthma, stroke and heart disease; and, to around 40,000 deaths in the UK every year. Emissions from licensed vehicles contribute to these high levels.
- Oxford has the potential for a great offer to its visitors, residents and businesses: a world class, clean, modern fleet of Hackney Carriage and Private Hire Vehicles.
- Currently Oxford licensed Hackney Carriage fleet has an old age, polluting profile - the fleet consists 100% of diesel vehicles: 51% are older than 15 years, with the six oldest vehicles being 19 years old. Over half of the fleet are Euro standard 3 and lower.

4. 81% of the fleet would not meet the current Oxford Low Emission Zone standards (Euro 5 for buses), if it were extended to include taxis.
5. Trip patterns indicate that taxi emissions are largely generated within the central areas of Oxford.
6. None of the existing licensed vehicles are zero-emissions capable and none meet the proposed Zero Emission Zone (ZEZ) standards. Reducing emissions in the taxi fleet presents an opportunity not only to improve air quality, but to showcase electric vehicles to our residents, businesses and visitors.
7. Oxford is not alone in taking these steps. For example: Coventry already require all newly licensed vehicles to be EURO 6 and will have a fully ULEV fleet by 2024; London have required all new applicants to be ULEV since January 2018; and, Dundee already has 94 pure electric (private hire) taxis operating in the city.
8. The overarching goals of the proposals in this report are:
  - That the economic impact on the Hackney Carriage trade respects their livelihood and builds resilience to global trends in mobility.
  - Achieving the urgent air quality improvement needed to meet Council targets for clean, safe air.
  - That Oxford City Council be a leader in sustainability, helping to attract investment and funding.

### **Go Ultra Low Oxford: Taxi scheme**

9. The Hackney Carriage trade provides an important service, within our wider transport system, to meet the diverse needs of the residents, businesses and visitors to Oxford.
10. The global trend in mobility is towards rapid adoption of electric vehicles, especially in cities where new forms of mobility are concentrated and infrastructure investment is needed. Oxford City Council has been working to support the trade to build capacity and resilience to the forthcoming changes to our mobility to ensure the valuable services it provides are preserved for the future.
11. These measures include raising awareness of the benefits of low emissions vehicles, bringing the manufacturers to Oxford, capacity building workshops, financial incentives and investigation of the local investment case for ultra-low emissions purpose-built taxis. The summary of those measures can be found in **Appendix 1**. The Council continues to actively explore other sources of finance and support for the local trade.

### **Recommended option of emission standards for Hackney Carriage Vehicles (HCV) licensed by this Authority**

12. To help address the high levels of toxic nitrogen dioxide in some city centre streets, options for an emissions standard were developed in consultation with the City of Oxford Licensed Taxi Association (COLTA) and feedback from drivers and owners that have attended the Council's capacity building workshops.

13. The proposals are based on the latest study of real world emissions by taxis<sup>1</sup> which show that EURO 5<sup>2</sup> models perform worse than EURO 4 and EURO 3 models, and are comparable to EURO 2 models. The proposals are therefore designed to avoid new EURO 5 vehicles applications, in order to ensure a real world emissions improvement is achieved in the journey towards a fully zero emissions capable fleet. **Appendix 2** describes and assesses the options, accounting for the overarching goals described above.

14. The recommended requirement:

- A. From 1<sup>st</sup> January 2020 remove the current requirement for new Hackney Carriage Vehicle (HCV) applications where the maximum age for a new vehicle to obtain a licence is “less than five years of age”
- B. From 1<sup>st</sup> January 2020 all renewal HCV applications must meet the EURO 4 standard as minimum; and, all new HCV applications must meet either the EURO 4, EURO 6 or ULEV standard as a minimum (EURO 5 vehicles are not considered to meet that standard);
- C. From 1<sup>st</sup> January 2022 all new HCV applications must meet ULEV standard or at least Euro 4 if replacing an existing Euro 4, Euro 5 or Euro 6 due to the vehicle being written off by an insurance company or is a temporary courtesy vehicle due to repairs;
- D. From 1<sup>st</sup> January 2025 all new and renewal HCV applications must meet the Ultra-Low Emissions Vehicle standard

Date From	<u>Renewal</u> HCV Applications	<u>New</u> HCV Applications:
1 <sup>st</sup> January 2020	All HCV must meet EURO 4 emission standard	All HCV must meet EURO4, EURO 6 or ULEV emission standard (EURO 5 vehicles will not be considered to meet this standard)
1 <sup>st</sup> January 2022	All HCV must meet EURO 4 emission standard	All HCV must meet ULEV standard, or at least Euro 4 if replacing an existing Euro 4, Euro 5 or Euro 6 due to the vehicle being written off by an insurance company or is a temporary courtesy vehicle due to repairs
1 <sup>st</sup> January 2025	All HCV must meet ULEV standard	All HCV must meet ULEV standard

15. The dates that EURO standards come into effect can vary: e.g. a manufacturer may be producing EURO 4 qualifying vehicles for a “transition period” before the official date that the standard comes into effect. For the purposes of this emission standard the following table describes how the emission standard of a vehicle will be assessed. Where there are “transition periods” the table assumes the highest Euro standard possible.

<sup>1</sup> Dallmann et al (2018). Available from: <https://www.trueinitiative.org/media/597524/true-london-rs-report-fv-20181214.pdf>

<sup>2</sup> Euro Standards are increasingly stringent exhaust pollution limits for new car models, introduced by the European Union in the early 1990s, starting with Euro 1. The current Euro Standard is Euro 6.

First DVLA Vehicle Registration Date	Standard assumed
From 1 <sup>st</sup> July 1992	Euro 1
From 1 <sup>st</sup> January 1996	Euro 2
From 1 <sup>st</sup> January 2000	Euro 3
From 1 <sup>st</sup> January 2005	Euro 4
From 1 <sup>st</sup> September 2009	Euro 5
From 1 <sup>st</sup> September 2014	Euro 6

16. A vehicle will be considered to meet the Ultra Low Emissions Vehicle standard if it meets the UK government's definition of an Ultra Low Emission Taxi (as of November 2018) "Taxis - These vehicles are purpose-built taxis and have CO2 emissions of less than 50g/km and can travel at least 112km (70 miles) without any emissions at all."<sup>2</sup>
17. Any applicant who believes that their vehicle meets a higher emissions standard than indicated by the requirements, as set out in the table above, may submit evidence to the Council. Where reasonable evidence is provided, officers may agree the appropriate emissions standard for that vehicle and issue a licence.

### **Amendment of vehicle age limit for first licensing of new Low and Ultra Low Emission Private Hire Vehicles**

18. Oxford City Council licensed Private Hire fleet is currently considerably younger and less polluting than licensed Hackney Carriage fleet. However, the Authority desires to further encourage licensed Private Hire trade in supporting the Council vision in improving the air quality.
19. Current licensing age limit criteria for all new Private Hire Vehicles to obtain a licence are *"The maximum age for a new vehicle to obtain a licence is "less than five years of age" when it is licensed"*.
20. To support the trade further in investing and switching to Low and Ultra Low Emission Vehicles it is proposed to amend the current criteria to the following *"The maximum age for a new Private Hire Vehicle to obtain a license is "less than five years of age" or "less than seven years of age for Alternative Fuel Type Vehicles (Tax Code TC59 definition), OR petrol vehicles (TC 48 definition) OR diesel vehicles (TC 49 definition AND meeting the RDE2 standard), that also produce CO2 emission figures of 110g/km or less as displayed in the DVLA V5 Vehicle Registration Certificate."*

### **Financial implications**

21. A study of local Hackney Carriage duty cycles was carried out. The study modelled the payback on investments in ultra-low emissions purpose-built taxis. It showed that ultra-low emissions purpose-built taxis, including the LEVC eTX and the Dynamo models, are a viable investment in Oxford due to the lower running costs compared to conventional vehicles. This is particularly pronounced for the Dynamo,

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<sup>2</sup>See <https://www.gov.uk/plug-in-car-van-grants> - eligible taxis. Government ULEV definitions are expected to adapt to a developing market. Updated definitions might be considered for NEW applications post 2025.

which could generate a saving of £19,000 over 6 years of ownership at an average mileage of 25,000 per year. In comparison the LEVC eTX could generate a saving of £1,500 after six years based on the same mileage.

22. Access to capital may be a challenge for potential investors in the vehicles and is a key concern for the trade. The council has committed to subsidising the Certificate of Compliance test and Licensing Application fees for the first ten “early adopters” to invest in and license an ultra-low emissions Hackney Carriage Vehicle in Oxford.
23. It is expected that over the five year period of transition to the ULEV standard that the cost of new vehicles and models will become more affordable and that a second hand market will develop. As above, the Council continues to actively explore other sources of finance and support for the local trade.

### **Legal issues**

24. In order to be enforceable the application of new emission standards and amendment of age limits would require the attachment of additional conditions to vehicles licences. The Local Government (Miscellaneous Provisions) Act 1976 at sections 47, 48 and 51 allows the Licensing Authority to attach to vehicle licences such conditions as it considers ‘reasonably necessary’. Improving standards in vehicle safety and air quality are relevant factors in this respect.
25. Improving air quality is in the interests of all persons and therefore no separate equalities assessment is considered necessary.

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**To:** General Purposes Licensing Committee  
**Date:** 5<sup>th</sup> February 2024  
**Report of:** Executive Director for Communities and People  
**Title of Report:** Licensed Vehicles Emission Standards Amendment

Summary and recommendations	
<b>Purpose of report:</b>	To consider a delay to the introduction of new emission standards for Hackney Carriage Vehicles licensed by this Authority
<b>Corporate Priority</b>	Enable Inclusive Economy, Pursue a Zero Carbon Oxford
<b>Policy Framework</b>	Air Quality Action Plan, Low Emission Strategy, Sustainability Strategy
<b>Recommendations:</b> That the General Purposes Licensing Committee resolves to:	
<ol style="list-style-type: none"> <li>1. <b>Consider</b> the request made by City of Oxford Licenced Taxicab Association to delay the introduction of ultra-low emission standards for Hackney Carriage Vehicles licensed by this Authority.</li> <li>2. <b>Consider</b> the results of a public consultation and statements submitted</li> <li>3. <b>Consider</b> the contents of this report and options set out in it</li> <li>4. <b>Agree</b> any amendments to the current emission standards for Hackney Carriage Vehicles licensed by this Authority;</li> <li>5. <b>Agree</b> that any such amendments be recommended to Council for adoption.</li> </ol>	

Appendices	
Appendix 1	GPL Committee Report January 2019
Appendix 2	COLTA request to delay the current HCV emission standards
Appendix 3	Responses to a Public Consultation
Appendix 4	Oxfordshire County Council representation
Appendix 5	Oxford City Council Sustainable Team representation

## Introduction and background

1. On 23<sup>rd</sup> January 2019 the General Purposes Licensing (GPL) Committee approved the recommendation to introduce new emission standards for Hackney Carriage

Vehicles (HCV) licensed by this Authority to reduce emissions in the taxi fleet and to improve air quality in the City.

2. It was acknowledged that Oxford City centre has high levels of toxic nitrogen dioxide, which contributes to diseases including cancer, asthma, stroke and heart disease; and, to around 40,000 deaths in the UK every year.

The GPL Committee report can be found in **Appendix 1**.

3. The current HCV emission standards, as adopted by the Council, are:

A. From 1st January 2020 all renewal HCV applications must meet the EURO 4 standard as minimum; and, with immediate effect all new HCV applications must meet either the EURO 4, EURO 6 or ULEV standard as a minimum (EURO 5 vehicles are not considered to meet that standard);

B. From 1st January 2022 all new HCV applications must meet ULEV standard or at least Euro 4 if replacing an existing Euro 4, Euro 5 or Euro 6 due to the vehicle being written off by an insurance company or is a temporary courtesy vehicle due to repairs;

C. From 1st January 2025 all new and renewal HCV applications must meet the Ultra-Low Emissions Vehicle standard

Date From	Renewal HCV Applications	New HCV Applications:
Renewal – 1st January 2020 New – Immediately	All HCV must meet EURO 4 emission standard	All HCV must meet EURO4, EURO 6 or ULEV emission standard (EURO 5 vehicles will not be considered to meet this standard)
1st January 2022	All HCV must meet EURO 4 emission standard	All HCV must meet ULEV standard, *or at least Euro 4 if replacing an existing Euro 4, Euro 5 or Euro 6 due to the vehicle being written off by an insurance company or is a temporary courtesy vehicle due to repairs
1st January 2025	All HCV must meet ULEV standard	All HCV must meet ULEV standard

4. The Authority can confirm that first two phases of the agreed emission standards in points A and B have been complied with. As a result, 71 HCV's with Euro standards 1,2 and 3 were upgraded to Euro 4. Currently the Taxi fleet is a combination of 73 vehicles with Euro 4 standards, 2 vehicles with Euro 6 and 34 vehicles which meet the ULEV standard.

#### **City of Oxford Licensed Taxicab Association (COLTA) request**

5. On 29<sup>th</sup> November 2023 City of Oxford Licensed Taxicab Association (COLTA) submitted a formal request to the Licensing Authority requesting for the final phase of the Council HCV emission standards to be extended by three (3) years. The current Council standard sets out that *'From 1st January 2025 all new and renewal HCV applications must meet the Ultra-Low Emissions Vehicle standard'*

6. COLTA provided various explanations in their request to consider delaying the final stage of the current emission standards implemented in 2019. The main reasons point to a financial and economic difficulties within the taxi trade

The final formal request can be found in **Appendix 2**.

## Public Consultation

7. Consideration of any substantial changes regarding the licenced trade provisions should be consulted at a local level in a form of public consultation, involving the trade, members of public, stakeholders and any other interested groups and individuals.
8. The Authority conducted a public consultation regarding the proposed extension of the last phase of the HCV emission standards as requested by COLTA to provide members with the outcome prior to determination. The public survey was live for consultation for two weeks. It was aimed at all members of public, trade, customers, stakeholders, who could respond and make a comment. The consultation was based online. It was advertised on Council website and various social media. Participants would have submitted their responses online.

Total responses to the survey: **426**

Do you support the current requirement? Or would you support delaying the ULEV Taxi requirement?

Option	Total	Percent
I support the current requirement for all Taxis to be ULEV by January 2025	45	10.56%
I support delaying the requirement for all Taxis to be ULEV by one year (January 2026)	21	4.93%
I support delaying the requirement for all Taxis to be ULEV by two years (January 2027)	7	1.64%
I support delaying the requirement for all Taxis to be ULEV by three years (January 2028)	350	82.16%
Not Answered	3	0.70%

What is the main reason for you choosing the above answer?

Option	Total	Percent
Financial	227	53.29%
Emissions	62	14.55%
Personal	47	11.03%
Vehicle	32	7.51%
Supporting Taxi Trade	299	70.19%
Not Answered	3	0.70%



9. The majority of respondents who supported the current emission standards or one year delay provided 'emissions' as the main reason. Respondents who supported a three-year delay mainly provided 'financial' or 'personal' as a reason.

The full responses can be found in **Appendix 3**.

### **Stakeholders' representations**

10. Oxfordshire County Council Transport and Infrastructure Officer provided a statement in relation to the public consultation in response to the question of whether they support the current HCV emission standard requirements or if they would support delaying the final phase of the requirements for up to three years.
11. The statement said that *'The County Council appreciates there is a balance to be struck between emissions standards and the financial realities facing the HCV and PHV trades... However, air quality remains a pressing public health concern, so we encourage the city council to be as ambitious as possible in setting emissions standards and would **urge the shortest possible delay to the "zero-emission capable" requirement**, especially after the planned implementation date for the wider ZEZ (if the scheme is approved following consultation).'*

The full statement can be found in **Appendix 4**.

12. Oxford City Council Environmental Sustainability Team also provided a statement and a set of data for consideration.
13. Whilst providing data comparison relating to vehicle costs and emissions, the statement noted that *'Consideration for the licensing decision should include finding the right balance to continue to deliver cleaner air, taking into account the overall emissions contribution that is made by Hackney trade, in the context of the service they provide and the current economic climate.'*

Full statement including the data can be found in **Appendix 5**.

14. Additional joint statement has been provided by Councillor Anna Railton, the Cabinet Member for Zero Carbon Oxford and Climate Justice and Councillor Louise Upton, Taxi Licensing Portfolio Holder stating the following:

*"The purpose of the current licencing requirements is to both improve air quality in the city (especially the city centre) and to decarbonise Oxford's transport. We appreciate that the increase in charging costs and of interest rates makes it harder to afford an electric HC, but our expectation that non-electric HCs will have to pay charges to enter the ZEZ from 2025/26 (and we all hope the cost of electricity is going to drop).*

*COLTA have asked for a three-year extension, we recommend a compromise position of a 1 year extension over the recommendation from 2019, in light of the current elevated charging prices."*

## Recommendations and option of emission standards for Hackney Carriage Vehicles (HCV) licensed by this Authority

15. To help address the high levels of toxic nitrogen dioxide in some city centre streets, HCV emissions standard were introduced by the Council in 2019 in consultation with the City of Oxford Licensed Taxi Association (COLTA) and feedback from drivers and owners that have attended the Council's capacity building workshops.
16. The first two phases of the emission standards (paragraph 3) were implemented successfully. These standards have been very effective, reducing emissions from the HC trade by approximately 50%. This is a significant achievement and shows the general commitment by the trade to electrify their vehicles.
17. The last phase of the current emission standards is due to commence on 1<sup>st</sup> January 2025, requiring all new and renewal HCV to meet the Ultra-Low Emissions Vehicle standard.
18. In light of the request received from COLTA, the Committee members are requested to consider the following options having in mind details contained in this report and appendices:
  - A. Retaining the current requirement for all Taxis to be ULEV by January 2025.
  - B. Delaying the requirement for all Taxis to be ULEV by **one year** (January 2026)  
\*Recommended by Oxford City Council Environmental Sustainability Officers and City Cllrs for Cabinet Member for Zero Carbon Oxford and Climate Justice and Taxi Licensing Portfolio Holder
  - C. Delaying the requirement for all Taxis to be ULEV by **two years** (January 2027)
  - D. Delaying the requirement for all Taxis to be ULEV by **three years** (January 2028)  
\*As requested by the Taxi trade Oxford Licensed Taxicab Association (COLTA)

## Financial implications

19. Since the implementation of the HCV emission standards in 2019 the affordability of the ULEV Taxis has worsened recently, with the cost for power and interest rates increasing. The cheapest way to electrify is to purchase a second-hand LEVC e-TX. Costs of operation are estimated to be approx. £2k higher than operating a diesel fuelled Euro 4 (TX4) per annum.
20. The original Emissions Pathway anticipated ZEZ cost implications for HCVs and PHVs fuelled conventionally. Based on a ZEZ access cost in 2025 of £8 per day and 250 journeys into the ZEZ per annum, this would offset the price differential between the second hand TX4, and a second hand LEVC TX of approx. £2k per annum. Meaning that proprietors who purchase second hand LEVC taxi would benefit financially for not having to pay the daily ZEZ charge of £8, against conventionally fuelled taxis.

## Legal issues

21. The Local Government (Miscellaneous Provisions) Act 1976 at sections 47, 48 and 51 allows the Licensing Authority to attach to vehicle licences such conditions as it considers 'reasonably necessary'. Improving standards in vehicle safety and air quality are relevant factors in this respect.
22. Improving air quality is in the interests of all persons and therefore no separate equalities assessment is considered necessary.

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**To:** General Purposes Licensing Committee  
**Date:** 23<sup>rd</sup> January 2019  
**Report of:** Head of Community Services  
**Title of Report:** Licensed Vehicles Emission Standards

<b>Summary and recommendations</b>	
<b>Purpose of report:</b>	To recommend introduction of emission standards for Hackney Carriage Vehicles and amend the vehicle age limit for Private Hire Vehicles licensed by this Authority
<b>Corporate Priority</b>	Vibrant Sustainable Economy, A Clean and Green Oxford
<b>Policy Framework</b>	Air Quality Action Plan, Low Emission Strategy, Sustainability Strategy
<b>Recommendations:</b> That the General Purposes Licensing Committee resolves to:	
1. <b>Approve</b> the recommended option for introduction of new emission standards for Hackney Carriage Vehicles licensed by this Authority; 2. <b>Approve</b> the recommended amendment to vehicle age criteria for licensing of new Low and Ultra Low Emission Private Hire Vehicles; 3. <b>Agree</b> that such proposals be recommended to Council for adoption.	

<b>Appendices</b>	
Appendix 1	Supporting Measures
Appendix 2	Full Analysis

### **Introduction and background**

1. Oxford City centre currently has high levels of toxic nitrogen dioxide, which contributes to diseases including cancer, asthma, stroke and heart disease; and, to around 40,000 deaths in the UK every year. Emissions from licensed vehicles contribute to these high levels.
2. Oxford has the potential for a great offer to its visitors, residents and businesses: a world class, clean, modern fleet of Hackney Carriage and Private Hire Vehicles.
3. Currently Oxford licensed Hackney Carriage fleet has an old age, polluting profile - the fleet consists 100% of diesel vehicles: 51% are older than 15 years, with the six oldest vehicles being 19 years old. Over half of the fleet are Euro standard 3 and lower.

4. 81% of the fleet would not meet the current Oxford Low Emission Zone standards (Euro 5 for buses), if it were extended to include taxis.
5. Trip patterns indicate that taxi emissions are largely generated within the central areas of Oxford.
6. None of the existing licensed vehicles are zero-emissions capable and none meet the proposed Zero Emission Zone (ZEZ) standards. Reducing emissions in the taxi fleet presents an opportunity not only to improve air quality, but to showcase electric vehicles to our residents, businesses and visitors.
7. Oxford is not alone in taking these steps. For example: Coventry already require all newly licensed vehicles to be EURO 6 and will have a fully ULEV fleet by 2024; London have required all new applicants to be ULEV since January 2018; and, Dundee already has 94 pure electric (private hire) taxis operating in the city.
8. The overarching goals of the proposals in this report are:
  - That the economic impact on the Hackney Carriage trade respects their livelihood and builds resilience to global trends in mobility.
  - Achieving the urgent air quality improvement needed to meet Council targets for clean, safe air.
  - That Oxford City Council be a leader in sustainability, helping to attract investment and funding.

### **Go Ultra Low Oxford: Taxi scheme**

9. The Hackney Carriage trade provides an important service, within our wider transport system, to meet the diverse needs of the residents, businesses and visitors to Oxford.
10. The global trend in mobility is towards rapid adoption of electric vehicles, especially in cities where new forms of mobility are concentrated and infrastructure investment is needed. Oxford City Council has been working to support the trade to build capacity and resilience to the forthcoming changes to our mobility to ensure the valuable services it provides are preserved for the future.
11. These measures include raising awareness of the benefits of low emissions vehicles, bringing the manufacturers to Oxford, capacity building workshops, financial incentives and investigation of the local investment case for ultra-low emissions purpose-built taxis. The summary of those measures can be found in **Appendix 1**. The Council continues to actively explore other sources of finance and support for the local trade.

### **Recommended option of emission standards for Hackney Carriage Vehicles (HCV) licensed by this Authority**

12. To help address the high levels of toxic nitrogen dioxide in some city centre streets, options for an emissions standard were developed in consultation with the City of Oxford Licensed Taxi Association (COLTA) and feedback from drivers and owners that have attended the Council's capacity building workshops.

13. The proposals are based on the latest study of real world emissions by taxis<sup>1</sup> which show that EURO 5<sup>2</sup> models perform worse than EURO 4 and EURO 3 models, and are comparable to EURO 2 models. The proposals are therefore designed to avoid new EURO 5 vehicles applications, in order to ensure a real world emissions improvement is achieved in the journey towards a fully zero emissions capable fleet. **Appendix 2** describes and assesses the options, accounting for the overarching goals described above.

14. The recommended requirement:

- A. From 1<sup>st</sup> January 2020 remove the current requirement for new Hackney Carriage Vehicle (HCV) applications where the maximum age for a new vehicle to obtain a licence is “less than five years of age”
- B. From 1<sup>st</sup> January 2020 all renewal HCV applications must meet the EURO 4 standard as minimum; and, all new HCV applications must meet either the EURO 4, EURO 6 or ULEV standard as a minimum (EURO 5 vehicles are not considered to meet that standard);
- C. From 1<sup>st</sup> January 2022 all new HCV applications must meet ULEV standard or at least Euro 4 if replacing an existing Euro 4, Euro 5 or Euro 6 due to the vehicle being written off by an insurance company or is a temporary courtesy vehicle due to repairs;
- D. From 1<sup>st</sup> January 2025 all new and renewal HCV applications must meet the Ultra-Low Emissions Vehicle standard

Date From	<u>Renewal</u> HCV Applications	<u>New</u> HCV Applications:
1 <sup>st</sup> January 2020	All HCV must meet EURO 4 emission standard	All HCV must meet EURO4, EURO 6 or ULEV emission standard (EURO 5 vehicles will not be considered to meet this standard)
1 <sup>st</sup> January 2022	All HCV must meet EURO 4 emission standard	All HCV must meet ULEV standard, or at least Euro 4 if replacing an existing Euro 4, Euro 5 or Euro 6 due to the vehicle being written off by an insurance company or is a temporary courtesy vehicle due to repairs
1 <sup>st</sup> January 2025	All HCV must meet ULEV standard	All HCV must meet ULEV standard

15. The dates that EURO standards come into effect can vary: e.g. a manufacturer may be producing EURO 4 qualifying vehicles for a “transition period” before the official date that the standard comes into effect. For the purposes of this emission standard the following table describes how the emission standard of a vehicle will be assessed. Where there are “transition periods” the table assumes the highest Euro standard possible.

<sup>1</sup> Dallmann et al (2018). Available from: <https://www.trueinitiative.org/media/597524/true-london-rs-report-fv-20181214.pdf>

<sup>2</sup> Euro Standards are increasingly stringent exhaust pollution limits for new car models, introduced by the European Union in the early 1990s, starting with Euro 1. The current Euro Standard is Euro 6.

First DVLA Vehicle Registration Date	Standard assumed
From 1 <sup>st</sup> July 1992	Euro 1
From 1 <sup>st</sup> January 1996	Euro 2
From 1 <sup>st</sup> January 2000	Euro 3
From 1 <sup>st</sup> January 2005	Euro 4
From 1 <sup>st</sup> September 2009	Euro 5
From 1 <sup>st</sup> September 2014	Euro 6

16. A vehicle will be considered to meet the Ultra Low Emissions Vehicle standard if it meets the UK government's definition of an Ultra Low Emission Taxi (as of November 2018) "Taxis - These vehicles are purpose-built taxis and have CO2 emissions of less than 50g/km and can travel at least 112km (70 miles) without any emissions at all."<sup>2</sup>
17. Any applicant who believes that their vehicle meets a higher emissions standard than indicated by the requirements, as set out in the table above, may submit evidence to the Council. Where reasonable evidence is provided, officers may agree the appropriate emissions standard for that vehicle and issue a licence.

### **Amendment of vehicle age limit for first licensing of new Low and Ultra Low Emission Private Hire Vehicles**

18. Oxford City Council licensed Private Hire fleet is currently considerably younger and less polluting than licensed Hackney Carriage fleet. However, the Authority desires to further encourage licensed Private Hire trade in supporting the Council vision in improving the air quality.
19. Current licensing age limit criteria for all new Private Hire Vehicles to obtain a licence are *"The maximum age for a new vehicle to obtain a licence is "less than five years of age" when it is licensed"*.
20. To support the trade further in investing and switching to Low and Ultra Low Emission Vehicles it is proposed to amend the current criteria to the following *"The maximum age for a new Private Hire Vehicle to obtain a license is "less than five years of age" or "less than seven years of age for Alternative Fuel Type Vehicles (Tax Code TC59 definition), OR petrol vehicles (TC 48 definition) OR diesel vehicles (TC 49 definition AND meeting the RDE2 standard), that also produce CO2 emission figures of 110g/km or less as displayed in the DVLA V5 Vehicle Registration Certificate."*

### **Financial implications**

21. A study of local Hackney Carriage duty cycles was carried out. The study modelled the payback on investments in ultra-low emissions purpose-built taxis. It showed that ultra-low emissions purpose-built taxis, including the LEVC eTX and the Dynamo models, are a viable investment in Oxford due to the lower running costs compared to conventional vehicles. This is particularly pronounced for the Dynamo,

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<sup>2</sup>See <https://www.gov.uk/plug-in-car-van-grants> - eligible taxis. Government ULEV definitions are expected to adapt to a developing market. Updated definitions might be considered for NEW applications post 2025.

which could generate a saving of £19,000 over 6 years of ownership at an average mileage of 25,000 per year. In comparison the LEVC eTX could generate a saving of £1,500 after six years based on the same mileage.

22. Access to capital may be a challenge for potential investors in the vehicles and is a key concern for the trade. The council has committed to subsidising the Certificate of Compliance test and Licensing Application fees for the first ten “early adopters” to invest in and license an ultra-low emissions Hackney Carriage Vehicle in Oxford.
23. It is expected that over the five year period of transition to the ULEV standard that the cost of new vehicles and models will become more affordable and that a second hand market will develop. As above, the Council continues to actively explore other sources of finance and support for the local trade.

### **Legal issues**

24. In order to be enforceable the application of new emission standards and amendment of age limits would require the attachment of additional conditions to vehicles licences. The Local Government (Miscellaneous Provisions) Act 1976 at sections 47, 48 and 51 allows the Licensing Authority to attach to vehicle licences such conditions as it considers ‘reasonably necessary’. Improving standards in vehicle safety and air quality are relevant factors in this respect.
25. Improving air quality is in the interests of all persons and therefore no separate equalities assessment is considered necessary.

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Service area or department	Community Services
Telephone	01865 252565
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29<sup>th</sup> November 2023

Dear Anna Dumitru (Licensing Team Leader)

On behalf of Oxford's Hackney carriage (black cab) trade, I write to you formally urging you to delay the Emission Standards policy and the requirement to change to zero emissions capable taxis to 2028.

It is absolutely vital that you have a clear understanding of the background of the difficulties that the trade has experienced since early 2020 such as medical emergencies, financial crises, industrial action and disruptions to the rail network. It is for these reasons which I will explain in more detail is why we are urging you to delay this policy for a further three years from 2025.

### **Impact of Covid-19**

Oxford's Hackney Carriage trade has endured its most challenging period in living memory. The Covid-19 pandemic hit our taxi trade hard – with lockdowns introduced in March 2020 till December 2021 seeing business completely decimate as we experienced a drop in work by as much as 80-90%. Taxi drivers had faced a real danger every day risking their lives. At least 4 of our colleagues died of Covid-19, with others no doubt still suffering from the aftereffects of Covid. Taxi drivers as an occupation had raised rates of death of 65.3 deaths per 100,000 (The office of National Statistics). But our drivers were still out there courageously providing a public service in literally life-threatening circumstances.

### **Impact of financial crises.**

Just as we were seeing the tail end of the impact of Covid, the financial crises unfolded as the cost of living increased sharply across the UK during 2021 and 2022. The annual rate of inflation reached 11.1% in October 2022, a 41-year high, before easing in subsequent months. This put a huge strain on our trade and drivers were and still are feeling the financial strain and trying to make ends meet by struggling to provide for their family. It continues to impact those that were already struggling. Fuel prices continue to be unstable and are higher to what they were before the onset of Covid.

The financial strain of high levels of costs has had a huge impact on our drivers throughout this year and it'll take time for our drivers to recover.

Through the rise of home working, the loss of local nightlife and the wider effect of the cost of living on consumers themselves, how and why people use taxi services has changed.

### **Impact of industrial action.**

The industrial action which began around May 2022 further contributed to our woes as a trade. It caused a significant disruption to holidaymakers and commuters right through to April 2023 but the aftereffects are still felt with no end insight for industrial action and more particular, further rail strikes planned in December 2023.

The strike action had crippled many parts of the rail and bus networks, postal workers, civil servants, teaching staff and NHS staff. With fewer trains running, there are more people working from home, less people needing to come home at the end of the day, or in the middle of the day. So this is further impacting our earnings as we witness less people coming out of Oxford station. There was and still is a lot of sitting around on the ranks.

### **Botley Road closure and disruption to rail network.**

To add to this, we cannot avoid the further disruption to our livelihood due to the circumstances surrounding Oxford rail station. With the closure of Botley road, this means 40% less jobs for drivers heading west of city as almost all of those passengers are now no longer hiring cabs due to the long detour we have to make to get to the west of the city adding time and money to passenger journey. Where a journey would cost around £7-8 from Oxford train station to the Premier Inn in Botley, is now costing around £25-£30 as we have to go around the ring road and whilst doing so, getting stuck in the traffic both ways caused due to Botley road closure.

This closure and the works on Botley road will continue till October 2024 as we've been informed which will mean a continuous disruption to our operations and a further impact on our livelihoods for a further year from now. A total of 18 months of disruption.

### **ZEZ – The requirement to change current cabs to EV in 2025 needs to be delayed.**

The introduction of the Zero Emissions Zone (ZEZ) in Oxford is certainly a positive move. Our trade has had many communications and discussions about this policy when it was in its planning stage and consequently introduced in Oxford. As a trade, around 30% of our cabs are now zero emission capable, significantly reducing our carbon footprint. We are doing our bit.

However, in the current climate, change must be bridged with affordability. It requires careful thought and a balanced approach. Because of all the issues I have explained above, this change needs to be gradual as drivers now more than ever, need breathing space. The requirement on owners to change the remaining cabs to those that are zero emissions capable by 2025 has now become unrealistic and not achievable. We have lost out on what should have been almost 4 productive years from 2020 to current times and this will no doubt continue with a gloomy financial forecast until the end of next year 2024 due to the works on Botley road and the rail station.

As explained, around 30% of our drivers have made that switch from diesel to electric and had done so at the tail end of Covid when the situation started to improve, but just before the initiation of the industrial action in the U.K.

I'm sure you don't need reminding or see evidence of the fact that in terms of switching our diesel cabs to electric, we fair better than both our City Council and County Council whilst they transition from diesel to electric vehicles. They are far behind with many more vehicles that still run on diesel. You would think that they lead by example. Forcing our trade to be

100% electric, without recognising the huge financial burden that each Proprietor will face is totally unjust.

A grant of £5000 was provided then by the Environmental Sustainability team towards the end of 2021 to help owners make that switch. But even if a further grant was made available, it would have to be significantly more than the last amount for any owner to give it some consideration but very unlikely that any investment would be made.

Currently, owners are simply not financially secure in this volatile financial climate to invest in an electric cab which cost £65,000 cash price and over £70,000 on a loan agreement. On an initial deposit of £5000 for a new EV Cab, the owner of the cab would be paying over £800 a month instalments for the Cab over 5 years. This is a second mortgage. It is simply not affordable nor a viable option in the current climate. Its simply suicidal.

Many other factors need to be considered now when buying and owning an electric cab. The financial situation is undoubtedly different to what it was in 2018/19. Also, owners being accepted for a loan will be a factor as banks are not willing to lend. It is also important to highlight the fact that the price of energy has increased significantly to a higher rate when charging the electric cab. The cost difference to charge a cab or fill one with diesel is insignificant. So, drivers who are yet to invest are doing a cost comparison and are very concerned as there is no clear evidence of any benefit. Many of the electric cab owners are now running their cabs on petrol rather than electric because it's cheaper. There are currently no savings because the cost of charging has doubled.

The financial consequences for drivers forced to change in 2025 will be disastrous especially knowing the fact that each of those owners including myself are currently paying higher rates and double the amount in most cases on everything including mortgage, energy, food, clothing and maintenance on their current cabs. Taxi drivers can't work from home as many people are doing in many industries. Since the onset of Covid to current times, the trade has been impacted unimaginably and we are still suffering as a consequence.

### **An urgent need to improve our working conditions.**

Those of us in the trade are hopeful the economy can bounce back. I emphasise the importance of revisiting the emission standards policy and allowing the trade a further three years beyond 2025, giving us some breathing space so that we may regroup, reevaluate and hope our situation improves. It is equally important that our authority understands how it can help the trade to recover from the difficulties we have experienced almost over the last 4 years at least.

Our working conditions must be improved and this can be achieved by granting us access through the routes in Oxford which we are currently restricted to access. This includes allowing us 24-hour access through the 'link route' (Norfolk Street) which runs alongside the Westgate shopping Centre. Secondly, allowing our trade access through those roads which have been blocked due to the creation of low traffic neighbourhoods (LTNs). Since the introduction of LTNs which were introduced during the time the trade was suffering due to the above difficulties, road closures quite frankly was rubbing the salt in the wounds. Our

movements are currently limited, and we are regularly getting trapped in traffic jams. We pride ourselves in providing a door-to-door service but are forced to settle for bollard to bollard. We can't get to the vulnerable passengers, especially those that are disabled and in a wheelchair. We are having to refuse bookings if it means we have to go the long way round to get to the passenger. As an example, a passenger we pick up from the train station going to Headington during traffic time now takes 1 hour 45 minutes as a round trip. Where is the sense in that? This means passengers are having to wait longer at the ranks because it takes longer for us to get back to the ranks.

Queen street/Carfax rank - As I have mentioned previously, to have a 24-hour rank on the Queen Street/Carfax will give the trade a massive boost and help the drivers begin to recover from the challenges we have had and are currently experiencing. Furthermore, as the Carfax rank being in an area quite central to Oxford city and a focal point where drivers can operate from during the day, will certainly put us on the path of recovery and we will begin to make back some of the losses incurred due to the difficulties I have explained. This will gradually improve our situation. This is absolutely vital in light of the circumstances we are up against at Oxford rail station which will continue throughout next year also.

I hope that our concerns are truly understood and the fact that we have been through a very difficult patch, and we continue to do so as currently the future looks bleak. Without your support, we cannot be on the path to recovery.

We urge you to allow the trade a further three years until owners are required to change their current cab to an electric one which will give us till 2028. This doesn't mean that owners will wait till 2028. If our working conditions improve, then as has been the case previously, owners will begin to invest. But our working conditions need to improve, and we need to see action rather than words. Access through the 'link route' beyond 7pm is vital in order for us to get round to our ranks quicker. Allowing our trade access through where the bollards are installed in places of LTNs. Most importantly, to support our desire to have a 24-hour rank on Carfax.

Thank you to everyone for reading my letter. I apologise if it's taken up a considerable amount of your time, but it was necessary that all of our immediate concerns were raised. I am confident that yourself and those officers that are working with you in relation to the emissions standards policy will take our concerns on board and fully appreciate our plight.

We have always had an amicable relationship with our Councillors and Officers throughout the years and you have always been prepared to help and have helped when the trade has asked. I am confident that you will once again help the trade as we've been through and are still experiencing serious challenges.

We look forward to receiving a positive outcome.  
Yours sincerely,

Mr. Sajad Khan  
Secretary of C. O. L. T. A  
(City of Oxford Licensed Taxicab Association; est. 1952)



Do you support the current requirement? Or would you support delaying the ULEV Tax requirement? - Support current or delay	What is the main reason for you choosing the above answer? - Reasoning - Financial	What is the main reason for you choosing the above answer? - Reasoning -	What is the main reason for you choosing the above answer? - Reasoning -	What is the main reason for you choosing the above answer? - Reasoning - Vehicle	What is the main reason for you choosing the above answer? - Reasoning -	Submitted Date
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial		Personal		Supporting Taxi Trade	2023-11-14 13:33:42
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I support the current requirement for all Taxis to be ULEV by January 2025			Personal			2023-11-14 13:43:53
I support the current requirement for all Taxis to be ULEV by January 2025		Emissions				2023-11-14 13:44:47
I support delaying the requirement for all Taxis to be ULEV by three years (January					Supporting Taxi Trade	2023-11-14 13:49:20
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial		Personal		Supporting Taxi Trade	2023-11-14 13:51:35
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial			Vehicle	Supporting Taxi Trade	2023-11-14 13:53:08
I support the current requirement for all Taxis to be ULEV by January 2025		Emissions				2023-11-14 13:56:29
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial				Supporting Taxi Trade	2023-11-14 13:56:47

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I support the current requirement for all Taxis to be ULEV by January 2025		Emissions				2023-11-14 14:01:27
I support delaying the requirement for all Taxis to be ULEV by one year (January 2026)	Financial	Emissions		Vehicle	Supporting Taxi Trade	2023-11-14 14:02:09
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial		Personal		Supporting Taxi Trade	2023-11-14 14:03:34
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial					2023-11-14 14:11:25
I support the current requirement for all Taxis to be ULEV by January 2025			Personal			2023-11-14 14:12:45
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I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial					2023-11-14 14:36:16
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I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial					2023-11-14 15:20:39
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial					2023-11-14 15:40:11
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial				Supporting Taxi Trade	2023-11-14 15:46:09
I support delaying the requirement for all Taxis to be ULEV by three years (January				Vehicle		2023-11-14 15:49:50
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial					2023-11-14 15:50:40
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I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial		Personal	Vehicle	Supporting Taxi Trade	2023-11-14 17:01:00
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I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial				Supporting Taxi Trade	2023-11-14 17:15:14



I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial				Supporting Taxi Trade	2023-11-14 17:45:05
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I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial				Supporting Taxi Trade	2023-11-14 17:52:50
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I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial				Supporting Taxi Trade	2023-11-14 18:04:07
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial				Supporting Taxi Trade	2023-11-14 18:05:33
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I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial					2023-11-14 19:18:22

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I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial					2023-11-14 22:57:33
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial					2023-11-14 22:58:27
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I support delaying the requirement for all Taxis to be ULEV by three years (January					Supporting Taxi Trade	2023-11-15 03:08:27
Not Answered						2023-11-15 03:44:33
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial					2023-11-15 03:45:58
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial					2023-11-15 09:09:54

I support delaying the requirement for all Taxis to be ULEV by three years (January					Supporting Taxi Trade	2023-11-15 09:43:22
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial					2023-11-15 10:38:10
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial					2023-11-15 10:41:59
I support delaying the requirement for all Taxis to be ULEV by three years (January					Supporting Taxi Trade	2023-11-15 10:44:12
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I support delaying the requirement for all Taxis to be ULEV by three years (January		Emissions			Supporting Taxi Trade	2023-11-15 15:34:32
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial					2023-11-15 16:32:50
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial		Personal	Vehicle	Supporting Taxi Trade	2023-11-15 17:02:53
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial				Supporting Taxi Trade	2023-11-15 17:23:44
Not Answered						2023-11-15 19:05:25

I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial					2023-11-15 20:05:43
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial			Vehicle		2023-11-15 20:11:30
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial					2023-11-15 21:00:28
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial					2023-11-15 21:42:22
I support the current requirement for all Taxis to be ULEV by January 2025		Emissions				2023-11-16 01:25:08
I support the current requirement for all Taxis to be ULEV by January 2025		Emissions				2023-11-16 01:26:00
I support the current requirement for all Taxis to be ULEV by January 2025		Emissions				2023-11-16 01:26:27
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial				Supporting Taxi Trade	2023-11-16 10:48:53
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial				Supporting Taxi Trade	2023-11-16 11:48:16
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial				Supporting Taxi Trade	2023-11-16 12:38:49
I support delaying the requirement for all Taxis to be ULEV by three years (January					Supporting Taxi Trade	2023-11-16 12:42:16

I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial				Supporting Taxi Trade	2023-11-16 12:45:52
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial				Supporting Taxi Trade	2023-11-16 12:45:52
I support delaying the requirement for all Taxis to be ULEV by one year (January 2026)	Financial	Emissions			Supporting Taxi Trade	2023-11-16 16:32:09
I support delaying the requirement for all Taxis to be ULEV by one year (January 2026)	Financial					2023-11-16 20:32:00
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial				Supporting Taxi Trade	2023-11-16 20:57:06
I support delaying the requirement for all Taxis to be ULEV by three years (January					Supporting Taxi Trade	2023-11-16 22:14:22
I support delaying the requirement for all Taxis to be ULEV by three years (January					Supporting Taxi Trade	2023-11-16 22:14:23
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial				Supporting Taxi Trade	2023-11-16 23:11:44
I support delaying the requirement for all Taxis to be ULEV by three years (January					Supporting Taxi Trade	2023-11-17 00:27:54
I support delaying the requirement for all Taxis to be ULEV by three years (January					Supporting Taxi Trade	2023-11-17 00:28:09
I support delaying the requirement for all Taxis to be ULEV by three years (January					Supporting Taxi Trade	2023-11-17 00:31:50

I support delaying the requirement for all Taxis to be ULEV by three years (January					Supporting Taxi Trade	2023-11-17 00:34:23
I support delaying the requirement for all Taxis to be ULEV by three years (January					Supporting Taxi Trade	2023-11-17 00:51:50
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial					2023-11-17 00:53:35
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial				Supporting Taxi Trade	2023-11-17 00:57:50
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial				Supporting Taxi Trade	2023-11-17 06:44:43
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial					2023-11-17 11:44:30
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial				Supporting Taxi Trade	2023-11-17 13:21:40
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial					2023-11-17 14:05:31
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial					2023-11-17 15:59:51
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial					2023-11-17 20:04:33
I support delaying the requirement for all Taxis to be ULEV by three years (January					Supporting Taxi Trade	2023-11-17 20:23:28

I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial				Supporting Taxi Trade	2023-11-17 20:24:21
I support delaying the requirement for all Taxis to be ULEV by three years (January					Supporting Taxi Trade	2023-11-17 20:51:51
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial				Supporting Taxi Trade	2023-11-17 20:52:32
I support delaying the requirement for all Taxis to be ULEV by three years (January					Supporting Taxi Trade	2023-11-17 20:53:12
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial				Supporting Taxi Trade	2023-11-17 21:47:45
I support delaying the requirement for all Taxis to be ULEV by three years (January					Supporting Taxi Trade	2023-11-17 21:54:36
I support delaying the requirement for all Taxis to be ULEV by three years (January					Supporting Taxi Trade	2023-11-17 23:16:05
I support delaying the requirement for all Taxis to be ULEV by three years (January					Supporting Taxi Trade	2023-11-18 00:17:47
I support delaying the requirement for all Taxis to be ULEV by one year (January 2026)		Emissions				2023-11-18 04:22:02
I support delaying the requirement for all Taxis to be ULEV by one year (January 2026)		Emissions				2023-11-18 04:23:03
I support delaying the requirement for all Taxis to be ULEV by one year (January 2026)		Emissions				2023-11-18 04:23:44



I support delaying the requirement for all Taxis to be ULEV by one year (January 2026)		Emissions				2023-11-18 04:24:12
I support delaying the requirement for all Taxis to be ULEV by one year (January 2026)		Emissions				2023-11-18 04:24:43
I support delaying the requirement for all Taxis to be ULEV by one year (January 2026)		Emissions	Personal			2023-11-18 04:25:36
I support delaying the requirement for all Taxis to be ULEV by one year (January 2026)	Financial	Emissions				2023-11-18 04:26:18
I support delaying the requirement for all Taxis to be ULEV by one year (January 2026)	Financial	Emissions				2023-11-18 04:26:50
I support delaying the requirement for all Taxis to be ULEV by one year (January 2026)	Financial	Emissions				2023-11-18 04:27:18
I support delaying the requirement for all Taxis to be ULEV by three years (January					Supporting Taxi Trade	2023-11-18 08:11:25
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial				Supporting Taxi Trade	2023-11-18 08:11:55
I support delaying the requirement for all Taxis to be ULEV by one year (January 2026)	Financial	Emissions		Vehicle		2023-11-18 15:26:33
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial				Supporting Taxi Trade	2023-11-18 15:56:46
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial				Supporting Taxi Trade	2023-11-18 16:09:19

I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial				Supporting Taxi Trade	2023-11-18 16:10:59
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial				Supporting Taxi Trade	2023-11-18 16:16:30
I support delaying the requirement for all Taxis to be ULEV by one year (January 2026)	Financial	Emissions				2023-11-18 16:43:52
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial				Supporting Taxi Trade	2023-11-18 16:46:23
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial				Supporting Taxi Trade	2023-11-18 17:40:41
I support delaying the requirement for all Taxis to be ULEV by three years (January					Supporting Taxi Trade	2023-11-18 17:42:16
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial				Supporting Taxi Trade	2023-11-18 20:43:38
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial				Supporting Taxi Trade	2023-11-18 20:44:56
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial				Supporting Taxi Trade	2023-11-18 20:47:34
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial				Supporting Taxi Trade	2023-11-18 20:48:37
I support delaying the requirement for all Taxis to be ULEV by three years (January					Supporting Taxi Trade	2023-11-18 21:20:02

I support delaying the requirement for all Taxis to be ULEV by three years (January					Supporting Taxi Trade	2023-11-18 21:20:52
I support delaying the requirement for all Taxis to be ULEV by three years (January					Supporting Taxi Trade	2023-11-18 21:21:58
I support delaying the requirement for all Taxis to be ULEV by three years (January					Supporting Taxi Trade	2023-11-18 21:23:03
I support delaying the requirement for all Taxis to be ULEV by three years (January					Supporting Taxi Trade	2023-11-18 21:48:09
I support delaying the requirement for all Taxis to be ULEV by three years (January					Supporting Taxi Trade	2023-11-18 21:53:18
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial		Personal		Supporting Taxi Trade	2023-11-18 22:14:58
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial		Personal		Supporting Taxi Trade	2023-11-18 22:17:00
I support delaying the requirement for all Taxis to be ULEV by three years (January					Supporting Taxi Trade	2023-11-18 22:29:12
I support delaying the requirement for all Taxis to be ULEV by three years (January			Personal			2023-11-18 22:30:58
I support delaying the requirement for all Taxis to be ULEV by three years (January					Supporting Taxi Trade	2023-11-18 22:42:13
I support delaying the requirement for all Taxis to be ULEV by three years (January					Supporting Taxi Trade	2023-11-18 22:43:26

I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial					2023-11-18 22:51:19
I support delaying the requirement for all Taxis to be ULEV by three years (January					Supporting Taxi Trade	2023-11-18 23:40:44
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial				Supporting Taxi Trade	2023-11-19 12:50:24
I support delaying the requirement for all Taxis to be ULEV by three years (January					Supporting Taxi Trade	2023-11-19 14:29:13
I support delaying the requirement for all Taxis to be ULEV by three years (January					Supporting Taxi Trade	2023-11-19 14:52:29
I support delaying the requirement for all Taxis to be ULEV by three years (January					Supporting Taxi Trade	2023-11-19 16:13:58
I support delaying the requirement for all Taxis to be ULEV by three years (January					Supporting Taxi Trade	2023-11-19 16:16:30
I support delaying the requirement for all Taxis to be ULEV by three years (January					Supporting Taxi Trade	2023-11-19 18:37:36
I support delaying the requirement for all Taxis to be ULEV by three years (January					Supporting Taxi Trade	2023-11-19 21:11:07
I support delaying the requirement for all Taxis to be ULEV by three years (January					Supporting Taxi Trade	2023-11-19 21:44:10
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial					2023-11-19 22:48:52

I support delaying the requirement for all Taxis to be ULEV by three years (January					Supporting Taxi Trade	2023-11-19 22:51:55
I support delaying the requirement for all Taxis to be ULEV by three years (January					Supporting Taxi Trade	2023-11-19 23:08:45
I support delaying the requirement for all Taxis to be ULEV by three years (January					Supporting Taxi Trade	2023-11-19 23:09:43
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial					2023-11-19 23:11:21
I support delaying the requirement for all Taxis to be ULEV by three years (January					Supporting Taxi Trade	2023-11-19 23:12:59
I support delaying the requirement for all Taxis to be ULEV by three years (January					Supporting Taxi Trade	2023-11-19 23:13:50
I support delaying the requirement for all Taxis to be ULEV by three years (January					Supporting Taxi Trade	2023-11-19 23:15:02
I support delaying the requirement for all Taxis to be ULEV by three years (January					Supporting Taxi Trade	2023-11-19 23:17:19
I support delaying the requirement for all Taxis to be ULEV by three years (January					Supporting Taxi Trade	2023-11-19 23:27:50
I support delaying the requirement for all Taxis to be ULEV by three years (January					Supporting Taxi Trade	2023-11-19 23:28:40
I support delaying the requirement for all Taxis to be ULEV by three years (January					Supporting Taxi Trade	2023-11-19 23:29:22

I support delaying the requirement for all Taxis to be ULEV by three years (January					Supporting Taxi Trade	2023-11-19 23:29:58
I support delaying the requirement for all Taxis to be ULEV by three years (January					Supporting Taxi Trade	2023-11-19 23:30:42
I support delaying the requirement for all Taxis to be ULEV by three years (January					Supporting Taxi Trade	2023-11-19 23:31:27
I support delaying the requirement for all Taxis to be ULEV by three years (January					Supporting Taxi Trade	2023-11-19 23:32:11
I support delaying the requirement for all Taxis to be ULEV by three years (January					Supporting Taxi Trade	2023-11-19 23:32:55
I support delaying the requirement for all Taxis to be ULEV by three years (January					Supporting Taxi Trade	2023-11-19 23:33:31
I support delaying the requirement for all Taxis to be ULEV by three years (January					Supporting Taxi Trade	2023-11-19 23:34:04
I support delaying the requirement for all Taxis to be ULEV by three years (January					Supporting Taxi Trade	2023-11-19 23:34:41
I support delaying the requirement for all Taxis to be ULEV by three years (January					Supporting Taxi Trade	2023-11-19 23:36:14
I support delaying the requirement for all Taxis to be ULEV by three years (January					Supporting Taxi Trade	2023-11-19 23:36:45
I support delaying the requirement for all Taxis to be ULEV by three years (January					Supporting Taxi Trade	2023-11-19 23:37:19

I support delaying the requirement for all Taxis to be ULEV by three years (January					Supporting Taxi Trade	2023-11-19 23:37:54
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial		Personal	Vehicle	Supporting Taxi Trade	2023-11-20 01:08:05
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial			Vehicle	Supporting Taxi Trade	2023-11-20 01:15:18
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial					2023-11-20 02:29:47
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial		Personal	Vehicle	Supporting Taxi Trade	2023-11-20 06:29:11
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial				Supporting Taxi Trade	2023-11-20 08:21:30
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial				Supporting Taxi Trade	2023-11-20 09:01:46
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial					2023-11-20 09:03:33
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial					2023-11-20 09:04:33
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial				Supporting Taxi Trade	2023-11-20 09:05:24
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial				Supporting Taxi Trade	2023-11-20 09:06:29

I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial				Supporting Taxi Trade	2023-11-20 09:29:24
I support delaying the requirement for all Taxis to be ULEV by three years (January					Supporting Taxi Trade	2023-11-20 12:49:57
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial				Supporting Taxi Trade	2023-11-20 12:51:38
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial				Supporting Taxi Trade	2023-11-20 12:54:09
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial				Supporting Taxi Trade	2023-11-20 13:09:29
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial				Supporting Taxi Trade	2023-11-20 13:13:15
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial		Personal		Supporting Taxi Trade	2023-11-20 13:25:01
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial				Supporting Taxi Trade	2023-11-20 13:29:39
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial					2023-11-20 13:31:16
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial		Personal		Supporting Taxi Trade	2023-11-20 13:34:32
I support delaying the requirement for all Taxis to be ULEV by three years (January					Supporting Taxi Trade	2023-11-20 13:40:11



I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial		Personal		Supporting Taxi Trade	2023-11-20 13:41:41
I support delaying the requirement for all Taxis to be ULEV by three years (January					Supporting Taxi Trade	2023-11-20 13:42:17
I support delaying the requirement for all Taxis to be ULEV by three years (January					Supporting Taxi Trade	2023-11-20 13:46:42
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial					2023-11-20 13:49:09
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial		Personal		Supporting Taxi Trade	2023-11-20 13:51:38
I support delaying the requirement for all Taxis to be ULEV by one year (January 2026)	Financial					2023-11-20 13:52:15
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial				Supporting Taxi Trade	2023-11-20 13:59:16
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial		Personal		Supporting Taxi Trade	2023-11-20 14:06:56
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial				Supporting Taxi Trade	2023-11-20 14:08:19
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial		Personal		Supporting Taxi Trade	2023-11-20 14:10:14
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial					2023-11-20 14:23:02

I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial				Supporting Taxi Trade	2023-11-20 14:26:37
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial				Supporting Taxi Trade	2023-11-20 15:16:07
I support delaying the requirement for all Taxis to be ULEV by three years (January					Supporting Taxi Trade	2023-11-20 15:41:00
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial		Personal	Vehicle		2023-11-20 15:45:57
I support delaying the requirement for all Taxis to be ULEV by three years (January					Supporting Taxi Trade	2023-11-20 15:49:23
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial		Personal		Supporting Taxi Trade	2023-11-20 16:05:39
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial					2023-11-20 16:25:21
I support delaying the requirement for all Taxis to be ULEV by three years (January					Supporting Taxi Trade	2023-11-20 16:26:39
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial				Supporting Taxi Trade	2023-11-20 16:26:57
I support the current requirement for all Taxis to be ULEV by January 2025			Personal	Vehicle	Supporting Taxi Trade	2023-11-20 16:28:39
I support delaying the requirement for all Taxis to be ULEV by three years (January					Supporting Taxi Trade	2023-11-20 16:29:54

I support delaying the requirement for all Taxis to be ULEV by three years (January					Supporting Taxi Trade	2023-11-20 16:30:55
I support delaying the requirement for all Taxis to be ULEV by three years (January					Supporting Taxi Trade	2023-11-20 16:34:18
I support delaying the requirement for all Taxis to be ULEV by three years (January					Supporting Taxi Trade	2023-11-20 19:57:37
I support delaying the requirement for all Taxis to be ULEV by three years (January					Supporting Taxi Trade	2023-11-20 20:00:17
I support delaying the requirement for all Taxis to be ULEV by three years (January					Supporting Taxi Trade	2023-11-20 20:01:11
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial				Supporting Taxi Trade	2023-11-20 20:27:58
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial				Supporting Taxi Trade	2023-11-20 20:29:22
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial				Supporting Taxi Trade	2023-11-20 20:30:57
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial				Supporting Taxi Trade	2023-11-20 20:32:03
I support the current requirement for all Taxis to be ULEV by January 2025		Emissions				2023-11-20 20:33:12
I support delaying the requirement for all Taxis to be ULEV by three years (January					Supporting Taxi Trade	2023-11-20 21:28:00

I support delaying the requirement for all Taxis to be ULEV by three years (January					Supporting Taxi Trade	2023-11-20 21:32:32
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial				Supporting Taxi Trade	2023-11-20 23:00:44
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial				Supporting Taxi Trade	2023-11-21 08:58:54
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial				Supporting Taxi Trade	2023-11-21 09:01:01
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial				Supporting Taxi Trade	2023-11-21 09:02:31
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial				Supporting Taxi Trade	2023-11-21 09:06:30
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial				Supporting Taxi Trade	2023-11-21 09:10:51
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial				Supporting Taxi Trade	2023-11-21 09:57:52
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial				Supporting Taxi Trade	2023-11-21 10:00:32
I support delaying the requirement for all Taxis to be ULEV by three years (January					Supporting Taxi Trade	2023-11-21 16:22:03
I support delaying the requirement for all Taxis to be ULEV by three years (January					Supporting Taxi Trade	2023-11-21 17:39:34

I support delaying the requirement for all Taxis to be ULEV by three years (January					Supporting Taxi Trade	2023-11-21 17:41:36
I support delaying the requirement for all Taxis to be ULEV by three years (January					Supporting Taxi Trade	2023-11-21 17:42:26
I support delaying the requirement for all Taxis to be ULEV by three years (January					Supporting Taxi Trade	2023-11-21 17:43:13
I support delaying the requirement for all Taxis to be ULEV by three years (January					Supporting Taxi Trade	2023-11-21 17:44:08
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial					2023-11-21 18:36:45
I support delaying the requirement for all Taxis to be ULEV by three years (January					Supporting Taxi Trade	2023-11-21 18:59:13
Not Answered					Supporting Taxi	2023-11-21 23:31:07
I support delaying the requirement for all Taxis to be ULEV by three years (January					Supporting Taxi Trade	2023-11-22 01:01:20
I support delaying the requirement for all Taxis to be ULEV by three years (January					Supporting Taxi Trade	2023-11-22 01:03:16
I support delaying the requirement for all Taxis to be ULEV by two years (January 2027)					Supporting Taxi Trade	2023-11-22 01:05:07
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial					2023-11-22 01:40:57

I support delaying the requirement for all Taxis to be ULEV by three years (January					Supporting Taxi Trade	2023-11-22 01:42:18
I support delaying the requirement for all Taxis to be ULEV by three years (January					Supporting Taxi Trade	2023-11-22 01:43:57
I support delaying the requirement for all Taxis to be ULEV by one year (January 2026)	Financial	Emissions				2023-11-22 08:54:03
I support the current requirement for all Taxis to be ULEV by January 2025		Emissions				2023-11-22 08:54:48
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial				Supporting Taxi Trade	2023-11-22 11:47:07
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial				Supporting Taxi Trade	2023-11-22 12:38:04
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial				Supporting Taxi Trade	2023-11-22 12:38:56
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial				Supporting Taxi Trade	2023-11-22 12:39:32
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial				Supporting Taxi Trade	2023-11-22 12:40:12
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial			Vehicle		2023-11-22 12:40:38
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial				Supporting Taxi Trade	2023-11-22 12:41:16

I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial		Personal		Supporting Taxi Trade	2023-11-22 12:41:41
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial				Supporting Taxi Trade	2023-11-22 12:42:15
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial				Supporting Taxi Trade	2023-11-22 12:42:40
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial				Supporting Taxi Trade	2023-11-22 12:43:09
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial				Supporting Taxi Trade	2023-11-22 12:43:38
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial				Supporting Taxi Trade	2023-11-22 12:44:05
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial				Supporting Taxi Trade	2023-11-22 12:44:48
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial				Supporting Taxi Trade	2023-11-22 12:45:11
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial				Supporting Taxi Trade	2023-11-22 12:45:37
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial					2023-11-22 15:48:31
I support delaying the requirement for all Taxis to be ULEV by one year (January 2026)	Financial	Emissions				2023-11-22 16:42:58

I support the current requirement for all Taxis to be ULEV by January 2025		Emissions				2023-11-22 16:43:34
I support the current requirement for all Taxis to be ULEV by January 2025		Emissions				2023-11-22 23:17:05
I support the current requirement for all Taxis to be ULEV by January 2025		Emissions				2023-11-23 09:06:42
I support delaying the requirement for all Taxis to be ULEV by three years (January			Personal		Supporting Taxi Trade	2023-11-23 16:12:04
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial	Emissions	Personal	Vehicle	Supporting Taxi Trade	2023-11-23 16:13:50
I support delaying the requirement for all Taxis to be ULEV by one year (January 2026)	Financial					2023-11-23 16:16:28
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial	Emissions	Personal	Vehicle	Supporting Taxi Trade	2023-11-23 16:23:37
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial					2023-11-23 16:31:53
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial				Supporting Taxi Trade	2023-11-23 16:32:28
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial			Vehicle	Supporting Taxi Trade	2023-11-23 16:36:10
I support delaying the requirement for all Taxis to be ULEV by one year (January 2026)	Financial	Emissions				2023-11-23 16:37:43



I support delaying the requirement for all Taxis to be ULEV by three years (January					Supporting Taxi Trade	2023-11-23 16:49:21
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial				Supporting Taxi Trade	2023-11-23 16:55:24
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial				Supporting Taxi Trade	2023-11-23 17:42:25
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial					2023-11-23 17:42:27
I support the current requirement for all Taxis to be ULEV by January 2025		Emissions				2023-11-23 20:05:33
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial				Supporting Taxi Trade	2023-11-23 20:56:59
I support delaying the requirement for all Taxis to be ULEV by three years (January					Supporting Taxi Trade	2023-11-23 22:51:47
I support delaying the requirement for all Taxis to be ULEV by three years (January					Supporting Taxi Trade	2023-11-23 22:52:27
I support delaying the requirement for all Taxis to be ULEV by three years (January					Supporting Taxi Trade	2023-11-23 22:53:04
I support delaying the requirement for all Taxis to be ULEV by three years (January					Supporting Taxi Trade	2023-11-23 22:53:43
I support delaying the requirement for all Taxis to be ULEV by three years (January					Supporting Taxi Trade	2023-11-23 22:55:42

I support delaying the requirement for all Taxis to be ULEV by three years (January					Supporting Taxi Trade	2023-11-23 22:56:26
I support delaying the requirement for all Taxis to be ULEV by three years (January					Supporting Taxi Trade	2023-11-23 22:57:04
I support delaying the requirement for all Taxis to be ULEV by three years (January					Supporting Taxi Trade	2023-11-23 22:57:38
I support delaying the requirement for all Taxis to be ULEV by three years (January					Supporting Taxi Trade	2023-11-23 22:58:15
I support delaying the requirement for all Taxis to be ULEV by three years (January					Supporting Taxi Trade	2023-11-23 22:58:51
I support delaying the requirement for all Taxis to be ULEV by three years (January					Supporting Taxi Trade	2023-11-23 22:59:23
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial				Supporting Taxi Trade	2023-11-23 23:00:22
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial				Supporting Taxi Trade	2023-11-23 23:00:57
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial				Supporting Taxi Trade	2023-11-23 23:01:32
I support delaying the requirement for all Taxis to be ULEV by three years (January					Supporting Taxi Trade	2023-11-23 23:02:23
I support delaying the requirement for all Taxis to be ULEV by three years (January					Supporting Taxi Trade	2023-11-23 23:02:55

I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial				Supporting Taxi Trade	2023-11-24 21:43:37
I support delaying the requirement for all Taxis to be ULEV by three years (January					Supporting Taxi Trade	2023-11-25 11:20:28
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial				Supporting Taxi Trade	2023-11-25 12:47:53
I support delaying the requirement for all Taxis to be ULEV by one year (January 2026)	Financial	Emissions				2023-11-25 15:16:25
I support the current requirement for all Taxis to be ULEV by January 2025		Emissions				2023-11-25 15:17:00
I support the current requirement for all Taxis to be ULEV by January 2025		Emissions				2023-11-25 15:17:30
I support the current requirement for all Taxis to be ULEV by January 2025		Emissions				2023-11-25 15:17:56
I support the current requirement for all Taxis to be ULEV by January 2025		Emissions				2023-11-25 15:18:35
I support the current requirement for all Taxis to be ULEV by January 2025		Emissions				2023-11-25 15:19:16
I support the current requirement for all Taxis to be ULEV by January 2025		Emissions				2023-11-25 15:19:42
I support the current requirement for all Taxis to be ULEV by January 2025		Emissions				2023-11-25 15:20:07

I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial				Supporting Taxi Trade	2023-11-25 18:34:28
I support delaying the requirement for all Taxis to be ULEV by two years (January 2027)	Financial				Supporting Taxi Trade	2023-11-25 18:34:33
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial					2023-11-26 19:58:01
I support delaying the requirement for all Taxis to be ULEV by one year (January 2026)	Financial	Emissions				2023-11-26 21:41:43
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial		Personal	Vehicle		2023-11-26 21:42:28
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial				Supporting Taxi Trade	2023-11-26 21:42:38
I support delaying the requirement for all Taxis to be ULEV by three years (January			Personal			2023-11-26 21:43:03
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial					2023-11-26 21:43:19
I support delaying the requirement for all Taxis to be ULEV by three years (January			Personal			2023-11-26 21:44:36
I support delaying the requirement for all Taxis to be ULEV by three years (January					Supporting Taxi Trade	2023-11-26 21:52:19
I support delaying the requirement for all Taxis to be ULEV by three years (January					Supporting Taxi Trade	2023-11-26 22:06:57

I support delaying the requirement for all Taxis to be ULEV by three years (January					Supporting Taxi Trade	2023-11-26 22:08:15
I support delaying the requirement for all Taxis to be ULEV by three years (January					Supporting Taxi Trade	2023-11-26 22:10:51
I support the current requirement for all Taxis to be ULEV by January 2025		Emissions				2023-11-26 22:12:10
I support delaying the requirement for all Taxis to be ULEV by three years (January					Supporting Taxi Trade	2023-11-26 22:12:39
I support the current requirement for all Taxis to be ULEV by January 2025		Emissions				2023-11-26 22:12:47
I support the current requirement for all Taxis to be ULEV by January 2025		Emissions				2023-11-26 22:13:17
I support the current requirement for all Taxis to be ULEV by January 2025		Emissions				2023-11-26 22:13:42
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial					2023-11-26 22:13:58
I support the current requirement for all Taxis to be ULEV by January 2025		Emissions				2023-11-26 22:14:07
I support the current requirement for all Taxis to be ULEV by January 2025		Emissions				2023-11-26 22:14:32
I support the current requirement for all Taxis to be ULEV by January 2025		Emissions				2023-11-26 22:14:52

I support delaying the requirement for all Taxis to be ULEV by three years (January					Supporting Taxi Trade	2023-11-26 22:15:07
I support the current requirement for all Taxis to be ULEV by January 2025		Emissions				2023-11-26 22:15:15
I support the current requirement for all Taxis to be ULEV by January 2025		Emissions				2023-11-26 22:15:37
I support the current requirement for all Taxis to be ULEV by January 2025		Emissions				2023-11-26 22:15:58
I support delaying the requirement for all Taxis to be ULEV by three years (January					Supporting Taxi Trade	2023-11-26 22:16:14
I support the current requirement for all Taxis to be ULEV by January 2025		Emissions				2023-11-26 22:16:25
I support the current requirement for all Taxis to be ULEV by January 2025		Emissions				2023-11-26 22:17:28
I support delaying the requirement for all Taxis to be ULEV by three years (January					Supporting Taxi Trade	2023-11-26 22:17:33
I support the current requirement for all Taxis to be ULEV by January 2025		Emissions				2023-11-26 22:18:44
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial				Supporting Taxi Trade	2023-11-26 22:35:41
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial				Supporting Taxi Trade	2023-11-27 02:32:42

I support delaying the requirement for all Taxis to be ULEV by three years (January					Supporting Taxi Trade	2023-11-27 08:16:31
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial					2023-11-27 08:16:53
I support delaying the requirement for all Taxis to be ULEV by three years (January			Personal		Supporting Taxi Trade	2023-11-27 08:17:12
I support delaying the requirement for all Taxis to be ULEV by three years (January				Vehicle	Supporting Taxi Trade	2023-11-27 08:17:32
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial		Personal		Supporting Taxi Trade	2023-11-27 08:17:51
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial		Personal	Vehicle	Supporting Taxi Trade	2023-11-27 08:18:12
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial				Supporting Taxi Trade	2023-11-27 08:37:03
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial		Personal		Supporting Taxi Trade	2023-11-27 09:42:44
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial				Supporting Taxi Trade	2023-11-27 09:55:08
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial				Supporting Taxi Trade	2023-11-27 09:57:09
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial				Supporting Taxi Trade	2023-11-27 10:27:47

I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial		Personal	Vehicle	Supporting Taxi Trade	2023-11-27 10:28:22
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial		Personal		Supporting Taxi Trade	2023-11-27 10:28:40
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial			Vehicle		2023-11-27 10:29:02
I support delaying the requirement for all Taxis to be ULEV by three years (January					Supporting Taxi Trade	2023-11-27 10:39:27
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial		Personal		Supporting Taxi Trade	2023-11-27 10:39:53
I support delaying the requirement for all Taxis to be ULEV by two years (January 2027)	Financial		Personal		Supporting Taxi Trade	2023-11-27 10:40:27
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial				Supporting Taxi Trade	2023-11-27 10:47:08
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial					2023-11-27 10:47:45
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial					2023-11-27 10:50:29
I support delaying the requirement for all Taxis to be ULEV by three years (January					Supporting Taxi Trade	2023-11-27 11:20:49
I support delaying the requirement for all Taxis to be ULEV by three years (January					Supporting Taxi Trade	2023-11-27 11:23:37



I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial				Supporting Taxi Trade	2023-11-27 11:27:34
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial				Supporting Taxi Trade	2023-11-27 11:29:27
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial				Supporting Taxi Trade	2023-11-27 12:28:55
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial				Supporting Taxi Trade	2023-11-27 12:41:09
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial				Supporting Taxi Trade	2023-11-27 12:45:28
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial			Vehicle	Supporting Taxi Trade	2023-11-27 13:10:19
I support the current requirement for all Taxis to be ULEV by January 2025				Vehicle		2023-11-27 13:49:30
I support delaying the requirement for all Taxis to be ULEV by three years (January					Supporting Taxi Trade	2023-11-27 13:50:30
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial				Supporting Taxi Trade	2023-11-27 14:03:41
I support delaying the requirement for all Taxis to be ULEV by two years (January 2027)					Supporting Taxi Trade	2023-11-27 14:23:28
I support delaying the requirement for all Taxis to be ULEV by two years (January 2027)					Supporting Taxi Trade	2023-11-27 14:24:24

I support delaying the requirement for all Taxis to be ULEV by two years (January 2027)					Supporting Taxi Trade	2023-11-27 14:25:21
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial				Supporting Taxi Trade	2023-11-27 14:26:02
I support delaying the requirement for all Taxis to be ULEV by three years (January					Supporting Taxi Trade	2023-11-27 14:26:39
I support delaying the requirement for all Taxis to be ULEV by three years (January					Supporting Taxi Trade	2023-11-27 14:27:20
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial				Supporting Taxi Trade	2023-11-27 14:27:55
I support delaying the requirement for all Taxis to be ULEV by three years (January					Supporting Taxi Trade	2023-11-27 14:28:30
I support delaying the requirement for all Taxis to be ULEV by two years (January 2027)						2023-11-27 14:29:15
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial				Supporting Taxi Trade	2023-11-27 16:19:09
I support delaying the requirement for all Taxis to be ULEV by three years (January					Supporting Taxi Trade	2023-11-27 16:22:44
I support delaying the requirement for all Taxis to be ULEV by three years (January					Supporting Taxi Trade	2023-11-27 16:27:17
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial				Supporting Taxi Trade	2023-11-27 17:08:21

I support the current requirement for all Taxis to be ULEV by January 2025		Emissions				2023-11-27 17:13:29
I support the current requirement for all Taxis to be ULEV by January 2025		Emissions				2023-11-27 17:13:51
I support the current requirement for all Taxis to be ULEV by January 2025		Emissions				2023-11-27 17:26:20
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial				Supporting Taxi Trade	2023-11-27 17:28:11
I support the current requirement for all Taxis to be ULEV by January 2025		Emissions				2023-11-27 18:58:33
I support delaying the requirement for all Taxis to be ULEV by three years (January					Supporting Taxi Trade	2023-11-27 19:13:59
I support delaying the requirement for all Taxis to be ULEV by three years (January					Supporting Taxi Trade	2023-11-27 19:14:33
I support delaying the requirement for all Taxis to be ULEV by three years (January					Supporting Taxi Trade	2023-11-27 19:15:21
I support delaying the requirement for all Taxis to be ULEV by three years (January					Supporting Taxi Trade	2023-11-27 19:15:47
I support delaying the requirement for all Taxis to be ULEV by three years (January					Supporting Taxi Trade	2023-11-27 19:16:15
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial				Supporting Taxi Trade	2023-11-27 19:16:42

I support delaying the requirement for all Taxis to be ULEV by three years (January					Supporting Taxi Trade	2023-11-27 19:28:19
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial				Supporting Taxi Trade	2023-11-27 19:48:37
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial				Supporting Taxi Trade	2023-11-27 20:47:46
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial				Supporting Taxi Trade	2023-11-27 20:48:29
I support delaying the requirement for all Taxis to be ULEV by three years (January					Supporting Taxi Trade	2023-11-27 20:48:57
I support delaying the requirement for all Taxis to be ULEV by three years (January					Supporting Taxi Trade	2023-11-27 20:49:45
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial				Supporting Taxi Trade	2023-11-27 20:50:24
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial				Supporting Taxi Trade	2023-11-27 21:46:47
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial				Supporting Taxi Trade	2023-11-27 22:12:49
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial					2023-11-27 22:13:24

Dear Anna

*Thank you for consulting the county council on options to change the deadline date for Hackney carriage vehicles (HCVs) licensed in Oxford to meet your 'ULEV taxi' standard, which requires vehicles to be zero-emission capable, with a minimum 70 miles zero-emission range and CO2 emissions below 50g/km.*

*Along with most of the other district councils in Oxfordshire, the city council regulates HCV and private hire vehicle (PHV) emissions through the licensing process.*

*All PHVs, and HCVs licensed outside Oxford, are charged a daily fee to enter the Oxford the Oxford zero-emission zone (ZEZ) pilot unless they are fully zero-emission. HCVs licensed in Oxford are exempt from charges in the ZEZ pilot, on the basis that they will need to meet the city council's ULEV taxi standard to operate anywhere in the city.*

***The county council strongly supports the continued regulation of HCV and PHV emissions by the city and district councils through the taxi licensing process as this supports the aims of the Oxford zero-emission zone and the county council's broader aims to reduce transport emissions.*** *The city council's approach is already delivering results, with around 30 zero emission capable HCVs already in operation and a steadily improving fleet of PHVs with a high proportion of hybrid-electric vehicles.*

*The county council appreciates there is a balance to be struck between emissions standards and the financial realities facing the HCV and PHV trades, with changing travel habits and increased operating costs. However, air quality remains a pressing public health concern, so we encourage the city council to be as ambitious as possible in setting emissions standards and would **urge the shortest possible delay to the "zero-emission capable" requirement**, especially after the planned implementation date for the wider ZEZ (if the scheme is approved following consultation).*

Many thanks

Martin

Martin Kraftl  
Technical Lead (Transport Planning) - Central

Transport and Infrastructure  
Oxfordshire County Council

## HC Fleet Affordability and Emissions Update 2024

There are a few key differences between 2019 and 2024, both regarding, the affordability of electric Hackney Carriages (HC) and regarding the Emissions benefit from the investment in such vehicles that should be considered in the context of this paper.

In summary, in 2018/19, over 50% of HC's licenced in Oxford had Euro 3 or lower standard engines, emitting up to 8.7tonnes of NOx pa. The Zero-Emission Capable Licensing Standards brought in, in 2019, required a minimum of Euro 4 standard engines, with all HC's to be zero-emission capable by 2025. These standards have been very effective, reducing emissions from the HC trade by over 50%. This is a significant achievement and shows the general commitment by the trade to electrify.

However, the affordability of the electric HC vehicles has significantly worsened recently, with the cost for power and interest rates more than tripling. This is unlikely to significantly improve within the next 12 months.

Consideration for the Licensing decision should include finding the right balance to continue to deliver cleaner air, taking into account the overall emissions contribution that is made by Hackney trade, in the context of the service they provide and the current economic climate.

### **1. Financial Implications**

In 2019, investment in an electric LEVC eTX showed a small return on investment at 6 years (see GPLC Paper 23/01/2019, Emissions Standards, §21). The business case for the trade at that time, based on a Feasibility study conducted by Cenex, was aligned with the Council's ambition to reduce emissions. In 2023/24 this business case has declined substantially:

By 2023/24 the energy and cost of living crisis have had a significant impact on electricity cost (3 to 4 times higher) and borrowing costs (3 times higher). Costs used in calculations by Cenex in 2018 are shown in the table below versus the costs in 2023/24 and % increase.

**Table 1 - Fuel & Electricity Costs Comparator (2018 vs 2023/24)**

Fuel	2018	2023/24	% Increase
Diesel p/l	121	145	20%
Petrol p/l	119	135	13%
Electricity Home Charging p/kWh	10.7	34	219%
Electricity Public Rapid Charging p/kWh	18	69	283%

Taking into account the total cost of ownership per annum, the cheapest type of HCV to own is now a second-hand conventional fuel TX4.

The cheapest way to electrify is to purchase a second-hand LEVC e-TX. Costs of operation are estimated to be approx. £2k higher than operating a diesel fuelled Euro 4 (TX4) per annum. This is based on a ratio of 70% home charging and 30% public rapid charging. The higher cost of public rapid charging also means that drivers and operators without access to a home charger face additional cost increases.

**Table 2 – Costs of Ownership in 2024**

<i>Vehicle</i>	<b>Option 1</b>	<b>Option 2</b>	<b>Option 3</b>	<b>Option 2</b>
	<b>New LEVC-TX Leased</b>	<b>New LEVC-TX Bought</b>	<b>2019 LEVC-TX Bought</b>	<b>2013 Euro 4 Bought</b>
<b>Net purchase price (after grants)</b>		£ 64,842	£ 42,500	£3,000
<b>Purchase/lease</b>	Lease	Purchase	Purchase	Purchase
<b>Total cost per annum using 30% petrol</b>	<b>£18,191</b>	<b>£14,009</b>	<b>£11,449</b>	<b>£10,578</b>
<b>Total cost per annum 100% electric</b>	<b>£19,229</b>	<b>£15,047</b>	<b>£12,487</b>	<b>£10,578</b>
<b>Cost per mile</b>	<b>£0.73</b>	<b>£0.56</b>	<b>£0.46</b>	<b>£0.42</b>
<b>NOx Emissions g/per mile</b>	0.13	0.13	0.13	0.62
<b>PM Emisisions g/per mile</b>	0.008	0.008	0.008	0.096

A more detailed estimate of costs of ownership between an LEVC eTX and Diesel (Euro 4) TX4 are shown in Annex 1.

## **2. Expanding ZEZ Implications & Charges**

The original Emissions Pathway anticipated ZEZ cost implications for HCVs and PHVs fuelled conventionally: Based on a ZEZ access cost in 2025 of £8 per day and 250 journeys into the ZEZ per annum this would offset the price differential between the second hand TX4, and a second hand LEVC TX of approx. £2k per annum, giving zero emission taxi's a competitive advantage over conventionally fuelled vehicles, supporting the overall business case.

However, if ZEZ access is free for all HCs and PHs, then this advantage is lost, adding risk to the investment into an electric HC or PH vehicle. This is challenging for HC operators which face nearly twice the up-front cost for their accessible electric vehicles than PH operators do.

## **3. Emissions**

The difference between HCV fleet emissions in 2018/19 and 2023/24 is shown in Annex 2 below. The investment of the Operators and the Council (via grant funding) in new vehicles has had a marked effect: In 23/24 one third of the Oxford HC fleet are ULEV compliant, emissions from the HC fleet have more than halved. The remainder of the fleet are operating Euro 4 Diesel Cabs (London Cab -TX4) and a few Euro 6 Diesel HCs.

There are two different data sources for calculating emissions, both of which are summarised below;

1. EU Euro standard calculations show that NOx, HCNOx and PM have reduced by 73% of original emissions. LEVC eTX are range extended vehicles and it is cost effective to run on petrol, so these assumptions include 30% of mileage in these vehicles is petrol fuelled.
2. Real World data (used for calculations in 2018/19). The comparison between 2018/19 and today, shows NOx have reduced to 54% of the original total. Note – we do not have accurate data for Real World petrol extended emissions, so an estimate for real world petrol emissions has been used.

The Air Quality Source Apportionment report (2020) for road transport only emissions, shows that NOx and PM emissions from Taxis are generally low (less than 1%) on a city-wide basis. The same report identified that in areas of higher taxi density, Hackney and Diesel taxis, have a more significant impact. Unfortunately, we do not have the same report for 23/24, so we are not able to confirm how apportionment has changed via the current electrification numbers, other than to confirm that overall Hackney NOx and PM emissions have reduced by over 50% and up to 73%.

Table 3 - Apportionment of Taxis as part of overall Transport emissions in Oxford (Report 2020, Data 2018)

<b>City Wide (2020)</b>	<b>NOx</b>	<b>PM2.5</b>	<b>PM10</b>
Hackney Cabs	0.07%	0.10%	0.07%
Petrol Taxis	0.01%	0.14%	0.16%
Diesel Taxis	0.11%		
<b>Taxis Total (City-Wide)</b>	<b>0.19%</b>	<b>0.25%</b>	<b>0.23%</b>
<b>Worcester Street (2020)</b>	<b>NOx</b>	<b>PM2.5</b>	<b>PM10</b>
Hackney Cabs	1.7%	2.2%	1.6%
Petrol Taxis	0.4%	3.0%	3.5%
Diesel Taxis	3.0%		
<b>Taxis Total (Worcester St)</b>	<b>5.1%</b>	<b>5.2%</b>	<b>5.1%</b>



ANNEX1: Comparative Costs of Hackney Ownership.

<b>Vehicle</b>	<b>Option 1</b>	<b>Option 2</b>	<b>Option 3</b>	<b>Option 2</b>
	<b>New LEVC-TX Leased</b>	<b>New LEVC-TX Bought</b>	<b>2019 LEVC-TX Bought</b>	<b>2013 Euro 4 Bought</b>
<b>Net purchase price (after grants)</b>		£ 64,842	£ 42,500	£ 3,000
<b>Purchase/lease</b>	Lease	Purchase	Purchase	Purchase
<b>Running Costs (annual)</b>				
Fuel/Charging 70% home, 30% fuel	£3,889	£3,889	£ 3,889	£4,768
Servicing & Maintenance	£620	£620	£920	£3,425
Insurance	£1,200	£1,200	£ 1,200	£1,200
Road Tax (annual)	£0	£0	£ -	£555
Congestion/ULEZ charges	£0			£0
<b>Lease cost (annual)/Interest</b>	<b>£12,482</b>	<b>£3,891</b>	<b>£2,550</b>	<b>£180</b>
<b>Depreciation</b>		<b>£4,409</b>	<b>£2,890</b>	<b>£450</b>
<b>Total Cost</b>	<b>£12,482</b>	<b>£8,300</b>	<b>£5,440</b>	<b>£630</b>
<b>Total cost per annum using 30% petrol</b>	<b>£18,191</b>	<b>£14,009</b>	<b>£11,449</b>	<b>£10,578</b>
<b>Total cost per annum 100% electric</b>	<b>£19,229</b>	<b>£15,047</b>	<b>£12,487</b>	<b>£10,578</b>
<b>Cost per mile</b>	<b>£0.73</b>	<b>£0.56</b>	<b>£0.46</b>	<b>£0.42</b>
<b>NOx Emissions g/per mile</b>	<b>0.13</b>	<b>0.13</b>	<b>0.13</b>	<b>0.62</b>
<b>PM Emisions g/per mile</b>	<b>0.008</b>	<b>0.008</b>	<b>0.008</b>	<b>0.096</b>

Please note: The average Hackney cab mileage used for calculations is 25,000 miles per year.

## ANNEX 2: Emissions Impact (2018 vs 2023/24)

<a href="https://dieselnet.com/standards/eu/ld.php">https://dieselnet.com/standards/eu/ld.php</a>																	Average km Per Annum			Average km using fuel (if electric)									
																	40000			12000									
2018/19 Data for Hackney Cabs Licenced in Oxford																	g/ km per annum Standards classification Euro engines			Total kg/km per annum			Real World						
																	NOx Commercial Vehicle	HCNOx	PM	NOx Commercial Vehicle	HCNOx	PM	Nox g/km	NOx Total Total per annum kg/km					
Age of Vehicle (First registration)	<2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	Grand Total													
Engine Type																													
E0	19	1														20	1.8	2	0.25	1440	1600	200	2.7	2160					
E1	23	4	2													29	1.5	1.7	0.25	1740	1972	290	2.4	2784					
E3	6		5	1	3											15	0.78	0.86	0.1	468	516	60	1.5	900					
E4						1	7	9	9	6	8					40	0.39	0.46	0.06	624	736	96	1.3	2080					
E5												3	2	3		8	0.28	0.35	0.05	90	112	16	2.4	768					
Grand Total	48	5	7	1	3	1	7	9	9	6	8	3	2	3	0	112				4362	4936	662		8692					
2023/24 Data for Hackney Cabs Licenced in Oxford																	g/ km per annum Standards classification Euro engines			Total kg/km per annum			Real World						
																	NOx Commerc	HCNOx	PM	NOx	HCNOx	PM	NOx g/km	Total NOx kg/km per annum					
Age of Vehicle (First registration)	2006	2007	2008	2009	2010	2011	2012	2014	2015	2018	2019	2020	2021	2022	2023	Grand Total													
Engine Type																													
Euro 4 - TX4 (Diesel)	1	10	11	22	12	13	3	1								73	0.39	0.46	0.06	1138.80	1343.20	175.20	1.30	3796.00					
Euro 6 (Diesel)								1	1							2	0.125	0.215	0.005	10.00	17.20	0.40	1.00	80.00					
ULEV compliant - LEVC-TX - Euro 6 (petrol)										4	4	7	5	13	1	34	0.082	0.082	0.005	33.46	33.46	2.04	0.25	100.37					
Grand Total	1	10	11	22	12	13	3	2	1	4	4	7	5	13	1	109				1182.3	1393.9	177.6		3976.4					
Emissions Reduction %																				73%	72%	73%		54%					
100% ULEV COMPLIANT - EURO 6																107	0.082	0.082	0.005	107.256	107.256	6.54	0.25	321					
Emission Saved through 100% electrification																				1075	1286.6	171.1		3655.4					

No real world data - this is estimated

No real world data - this is estimated



## City of Oxford Licensed Taxicab Association *(Est. 1952)*

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15 Belvedere Road,  
Oxford, OX4 2AZ  
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Tel: 07702031372

11<sup>th</sup> April 2025

To Oxford City Taxi Licensing,

### **RE: Emmisions Standards policy for Hackney Carriages**

I am writing to formally request an extension to the Emission Standards policy that is scheduled to be implemented from January 2026.

As you are aware our taxi trade has been navigating through an exceptionally challenging period since Covid. The cumulative impact of challenges (further explained) has strained our resources and capabilities, making it incredibly tough for us to comply with the impending emissions standards within the given timeframe.

The taxi trade of Oxford has faced unprecedented challenges, from significant drops in passenger numbers particularly at the train station due to people working from home and the lack of a daytime taxi rank in the heart of the city centre (Queen street). The permanent shutdown of nightclubs is another major blow, including the continued closure of Botley Road. The uncertainty about a Unitary Council and how that would impact our taxi trade. Also, the introduction of Uber in Oxford and how that's significantly impacted our operations with Uber's unfair pricing structure which no locally licensed operators can match.

These issues have created financial hardships that has left our drivers struggling to stay afloat including those who are currently struggling to pay monthly instalments on their electric taxi.

### **An attempt to deregulate our trade**

This issue is connected to all the difficulties we are currently experiencing, it is important that I explain how this development has sent shockwaves to the trade.

A cloud of uncertainty had been forced upon us by our licensing department where in their recent report which was scheduled to be presented to the GPLC on 10<sup>th</sup> February

2025 but withdrawn prior to the meeting, the licensing officer responsible recommended to deregulate the Hackney Carriage trade. This recommendation was very alarming and our drivers were in a state of shock, especially given the significant investment we have been asked to make in purchasing the electric taxi which costs above £102,000 for a new one to purchase.

Our trade requires assurances. On one hand we are being pushed to invest heavily in electric taxis, which is a considerable financial commitment, on the other hand, there are ongoing discussions about deregulating the trade, which are contradictory and nonsensical. We need clarity and assurance that our investments will be protected and that the trade regulation will remain.

It is crucial for the readers to understand the full implications of deregulation and how it will impact our business and future investments. As has been the case in previous years, an independent met/unmet demand survey ought to be carried out which in previous years has provided the licensing office with valuable data.

### **Uber granted a licence**

The trade was astonished to learn that Uber were granted a license towards the end of 2024 to operate in Oxford. There was no prior discussions with any licensing officer informing us that Uber had applied and this development seemed obscure. We were informed by a telephone conversation by taxi licensing the day Uber was granted the license to operate.

Uber's introduction to Oxford is already having an impact on our trade. They are a billions of pounds multinational entity currently offering up to 50% discount to passengers during a promotional period. Uber then pay extra to their drivers (top up) during the surcharge period throughout the day. As one example, the passenger may pay £5 (discounted) from the train station to the John Radcliffe Hospital. The driver will get paid £25 by Uber because it's a surcharge period. No taxi operator can compete with this pricing structure and it's unfair competition with unregulated practices.

Uber have a lot of money and they can pump millions of pounds into their business model in any particular city like Oxford and in the process, put the local taxi trade and the private hire operators out of business.

Another concern is Uber drivers licensed outside of Oxford but coming and operating in Oxford. We have seen licensed vehicles arriving from Reading, Portsmouth and Wolverhampton operating in our city. If the floodgates are allowed to be left open like this, we will see an unbearable level of vehicles operating for Uber and flooding our city.

We have no idea what discussions had taken place between Uber and our licensing department and whether concerns were raised about the increased levels of vehicles

licensed to work in Oxford. We believe that the committee needs clarification including the full details of the discussions had between Uber and the licensing department.

On a final point here, up until the licensing of Uber in November 2024, in Oxford there were 772 private hires plus 400 out of town taxis making it a total of 1172 vehicles operating in Oxford. In light of Uber's introduction to Oxford, it is most likely that this number will increase significantly as more drivers gain a license in Oxford (who may not live in the city) and others travelling from outside of Oxford but operating within the city. This will prove problematic in the very near future as the plans to reduce the number of vehicles in the city centre will be difficult to keep in check and it will have a negative impact on the level of emissions when it is this very issue we are forced to invest even though the level of emissions we are seen to be responsible for is insignificant. The report on this is available.

### **Botley Road closure**

The prolonged closure of Botley Road is continuing to have a huge impact on our operations. The road has been closed since March 2023. The proposed reopening date in October 2026 is uncertain in light of the previous deadlines that have been missed. This continued closure is significantly impacting our movements and livelihoods. We have lost all of our work going and returning from the west of the city centre.

### **Delay to ZEZ**

The introduction of the expanded Zero Emissions Zone (ZEZ) is also delayed. As you are aware, the introduction of the expanded ZEZ was initially planned to begin in 2025 but due to setbacks because of other issues including the Botley Road closure, this planned zone is now facing further delays and we are told it will be introduced in late 2027 or beginning of 2028. This is uncertain as the introduction of the ZEZ is dependent on the opening of the Botley Road.

The whole reason for the push to change our diesel taxi to electric ones was tied in with the plans for a zero emission zone. As we know, the introduction of an expanded ZEZ is not happening until at least 2028. Therefore, our trade cannot be forced into complying to an expanded ZEZ which will not be introduced for another 2 to 3 years from now. In fact, this now gives all of us the opportunity to work towards an expanded ZEZ and allowing the trade up until 2028 to gradually change our remaining diesel vehicles to electric cabs. A gradual change is a positive move and has worked over the previous five years where drivers have been able to change their cabs during this whole process.

## **Unitary council**

The discussions based around the plans for a unitary council is another major development which has created anxiety within the trade. There are many unanswered questions at the moment and no one is sure how the plans for a unitary council will impact Oxford businesses as a whole but more importantly, the impact on our taxi trade.

If a single licensing authority was to be introduced incorporating a larger area for Oxford, undoubtedly those vehicles licensed outside of Oxford will then be operating freely within the current boundary lines of Oxford and this will have a significant impact on many aspects not only impacting our trade, but the whole of Oxford city.

In light of the above difficulties described and the potential introduction of a unitary council, currently we strongly feel that it would be highly unreasonable and unjust that we are forced in to making a huge investment in purchasing the electric taxi so soon from January 2026 onwards. We are seeking your understanding and support in granting us additional time to make the switch to meet the emission standards. This extension would not only provide much-needed relief but also ensure that we can transition more smoothly and sustainably towards the new regulations. This would also enable our Licensing department to consider how best to deal with other factors which are upon us and described in this letter and then make a balanced decision.

Given the above circumstances, we request additional time to transition our remaining diesel taxis to electric taxis. Out of a fleet of 107 Hackney carriages, thirty eight (38) owners have already transitioned to electric cabs. License holders have always been committed to the emission standards policy and other requirements that our licensing department have instructed us to do.

The above issues described are certainly valid and undoubtedly impacted the timeline for transitioning to electric taxis in 2026. We believe that with extra time to switch, the remaining license holders can ensure a smooth and successful transition to electric taxis, aligning with the goals of the ZEZ in 2028.

We are committed to adhering to the environmental goals outlined in the policy and believe that with more time, we can effectively align our operations to meet the required standards. Your support in this matter would be much appreciated.

Yours sincerely,

A handwritten signature in black ink, consisting of several overlapping loops and a final downward stroke.

Sajad Khan  
Secretary of C. O. L. T. A.

### **HC Fleet Affordability and Emissions Update 2025**

There are a few key differences between 2019, 2024 and 2025, both regarding, the affordability of electric Hackney Carriages (HC) and regarding the Emissions benefit from the investment in such vehicles that should be considered in the context of this paper.

In summary, in 2018/19, over 50% of HC's licenced in Oxford had Euro 3 or lower standard engines, emitting up to 8.7tonnes of NOx pa. The Zero-Emission Capable Licensing Standards brought in, in 2019, required at the time a minimum of Euro 4 standard engines, with all HC's to be zero-emission capable by 2025, (now 2026). These standards have been very effective, reducing real world emissions from the HC trade by almost 60%. This is a significant achievement and shows the commitment by the trade to reducing emissions.

The Plug-in Taxi Grant was introduced in 2017 offering £7500 off the price of new E-Taxis. In quarter 1 of 2024, the grant was reduced to £6,000 and in April 2025 it was further reduced to a maximum of £4000.

As reported in 2024, the affordability of new electric HC vehicles has significantly worsened since 2019, with the cost for power and interest rates more than tripling from 2018/19 to 2023/24. In the last 12 months this has worsened, by the reduction of the Plug-in Taxi Grant (PiTG) from £7500 in 2017 to £4000 in April 2025.

Consideration for the Licensing decision should include finding the right balance to continue to deliver cleaner air, taking into account the overall emissions contribution that is made by Hackney trade, in the context of the service they provide and the current economic climate.

It should also be noted that this report is based on average data and comparators.

#### **1. Financial Implications**

In 2019, investment in a new electric LEVC eTX showed a small return on investment at 6 years (see GPLC Paper 23/01/2019, Emissions Standards, §21). GULO funding and low electricity pricing supported an electricity price of 18p/kWh for home and public charging. The business case for the trade at that time, based on a Feasibility study conducted by Cenex, was aligned with the Council's ambition to reduce emissions.

Today energy and cost of living crisis have had a significant impact on electricity cost (public charging is now 3 to 4 times higher) and borrowing costs (3 times higher). In 2025 the average cost of UK public rapid charging has increased by 7p/kWh to 76p/kWh.

Oxford City Council has worked to support the hackney trade by securing reduced charging at 46p/kWh for Taxi drivers at Blink Rapid charge points within the city until at least January 2026. Fastned at Redbridge also offer 0.52p/kWh using a £120 pa gold card subscription. Newish smart electric vehicle home charging tariffs, via Octopus and EON energy amongst others, offer exceptional rates for overnight charging (@8p/kWh).

A new electric London Taxi (LEVC e-TX) as in 2024, remains more expensive to own and run than a second-diesel London Taxi. However, a second-hand (assumed average £42.5k) electric London Taxi, if majority charged at home (average 21p/kWh), can be more economical than a second-hand diesel Euro 4. Costs of operation become less viable compared to diesel equivalents, if Hackney Cab Owners do not have access to home charging and rely on public charging as the main source of electricity.



Costs used in calculations by Cenex in 2018 are shown in the table below versus the costs in 2023/24, 2024/25 and % increases.

**Table 1 - Fuel & Electricity Costs Comparator (2018 vs 2023/24 vs 2024/25)**

Fuel	2018	2023/24	2024/25	% Increase 2018 to 2023/24	% Increase 2018 to 2024/25
Diesel p/l	121	145	143	20%	18%
Petrol p/l	119	135	135	13%	13%
Electricity Home Charging p/kWh	10.7	34	21	219%	97%
Electricity Public Rapid Charging p/kWh	18	69	76	283%	322%
Electricity Taxi Blink Rapid Charging p/kWh	18	69	46	283%	156%
Electricity Taxi Fastned Rapid Charging p/kWh	18	49	52	172%	189%

**Table 2 – Costs of Ownership in 2025**

Vehicle	Option 1 New LEVC-TX Leased	Option 2 New LEVC-TX Bought	Option 3 2019 LEVC-TX Bought (home charge)	Option 4 2013 Euro 4 Bought
Net purchase price (after grants)		£ 68,342	£ 42,500	£ 3,000
Purchase/lease	Lease	Purchase	Purchase	Purchase
TCO 100% home charging	£16,386	£13,130	£9,941	£10,708
TCO pa 70% home, 30% fuel	£17,015	£13,759	£10,570	£10,708
TCO pa - Fully electric 100% electric - 70% home , 30% rapid	£17,309	£14,053	£10,864	£10,708
TCO pa Public charging only + 30% petrol	£19,168	£15,912	£12,724	£10,708
Cost per mile	£0.68	£0.55	£0.42	£0.43
NOx Emissions g/per mile	0.13	0.13	0.13	0.62
PM Emisions g/per mile	0.008	0.008	0.008	0.096

A more detailed estimate of costs of ownership between an LEVC eTX and Diesel (Euro 4) TX4 is shown in Annex 1, including all assumptions.

## 2. Expanding ZEZ Implications & Charges

The original Emissions Pathway anticipated ZEZ cost implications for HCVs and PHVs fuelled conventionally:

Fees for ZEZ access (as of August 2025) will be £10 per day for Euro 4 Diesel Hackney cabs. Assuming 250 journeys into the ZEZ per annum, there is an additional £2.5k pa cost to running a Diesel TX4. This additional £2.5k, gives zero emission taxi's a competitive advantage over conventionally fuelled vehicles, hugely supporting the overall business case and supporting alignment with purchase of even a new electric hackney (assuming borrowing at 7%).

If ZEZ access becomes free for all HCs and PHs, then this advantage is lost, adding risk to the investment into an electric HC or PH vehicle, especially as HC operators face nearly twice the up-front cost for their accessible electric vehicles than PH operators do.

*It should be noted that any expansion to the ZEZ will not happen until earliest autumn 2027 and currently ZEZ charges only apply to a few roads in the city centre, therefore this price differential has not currently been included in the calculations. If charges remain as currently set out then the business case for electrification will significantly improve.*

## 3. Emissions

The difference between HCV fleet emissions in 2018/19 and 2023/24 and 2024/25 is shown in Annex 2 below. In 24/25 nearly 40% of the fleet are ULEV compliant, real world emissions from the HC fleet have reduced by almost 60%. The majority remainder of the fleet are operating Euro 4 Diesel Cabs (London Cab -TX4).

There are two different data sources for calculating emissions, both of which are summarised below:

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1. EU Euro standard calculations show that NO<sub>x</sub>, HCNO<sub>x</sub> and PM have reduced by 76%, 75% and 76% respectively of original emissions. LEVC eTX are range extended vehicles and it is more cost effective for Operators to run on or top up petrol for longer journeys, if they cannot charge at home. Public charging is 25% more expensive than using petrol via the range extender. Assumptions, therefore include 30% of mileage in these vehicles as petrol fuelled.
2. Real World data (used for calculations in 2018/19). The comparison between 2018/19 and today, shows NO<sub>x</sub> emissions have reduced to 59% of the original total. Note – we do not have accurate data for Real World petrol extended emissions, so an estimate for real world petrol emissions has been used.

The 2025 Air Quality Source Apportionment report for road transport emissions (based on 2022 data), provided more detail on the differences in emissions between Private Hire (PHV) and Hackney Cabs (HC). It's modelling includes the recent 69% electrification of bus fleet in Oxford, which has resulted in almost 30% reduction in bus emissions and thereby a rebalanced transport emissions sector.

Overall emissions from Taxis, in relation to all transport emissions, have increased in proportion to overall vehicle emissions by just over 1%, albeit Taxi emissions remain generally low, @2% on a city-wide basis. Private Hire vehicles contribute more emissions than HCV's and diesel taxi's (HCV and PHV) contribute more than petrol. The same report identified that in areas of higher taxi density, Hackney taxis have comparable NO<sub>x</sub> emissions to PHV and considerably lower particle emissions. Overall, Hackney NO<sub>x</sub> and PM emissions have reduced by over 59% and up to 74%.

Table 3 - Apportionment of Taxis as part of overall Transport emissions in Oxford (Report 2025, Data 2022) in key city locations.

	Hackney				Private Hire				Other Taxi		
	NOx %	PM2.5 %	PM10 %		NOx %	PM2.5 %	PM10 %		NOx %	PM2.5 %	PM10 %
St Clements/ The Plain	1.1	1	0.9		1.2	3	3.2		0.2	0.2	0.2
Headington	0.8	0.9	0.7		0.9	2.6	2.7		0.1	0.2	0.1
Botley road	1.0	0.9	0.8		1	2.8	3.0		0.2	0.1	0.2
Worcester Street	0.9	0.8	0.9		1.0	2.7	2.9		0.1	0.2	0.1

ANNEX1: Comparative Costs of Hackney Ownership.

	Option 1	Option 2	Option 3	Option 4
<i>Vehicle</i>	New LEVC-TX Leased	New LEVC-TX Bought	2019 LEVC-TX Bought (home charge)	2013 Euro 4 Bought
Net purchase price (after grants)		£ 68,342	£ 42,500	£ 3,000
Purchase/lease	Lease	Purchase	Purchase	Purchase
Running Costs (annual)				
Fuel/Charging 70% home, 30% fuel	£2,713	£2,713	£ 2,713	£4,898
Servicing & Maintenance	£620	£620	£920	£3,425
Insurance	£1,200	£1,200	£ 1,200	£1,200
Road Tax (annual)	£0	£0	£ -	£555
Congestion/ULEZ charges	£0			£0
Lease cost (annual)/Interest	£12,482	£4,579	£2,848	£180
Depreciation		£4,647	£2,890	£450
Total Cost	£14,302	£11,046	£7,858	£10,708
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TCO pa - Fully electric 100% electric - 70% home , 30% rapid	£17,309	£14,053	£10,864	£10,708
TCO pa Public charging only + 30% petrol	£19,168	£15,912	£12,724	£10,708
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Please note: The average Hackney cab mileage used for calculations is 25,000 miles per year.

ANNEX 2: Emissions Impact (2018 vs 2023/24 vs 2024/25)

<a href="https://dieselnet.com/standards/eu/ld.php">https://dieselnet.com/standards/eu/ld.php</a>																Average km Per Annum			Average km using fuel (if electric)											
																40000			12000											
																g/ km per annum Standards classification Euro engines			Total kg/km per annum			Real World								
2018/19 Data for Hackney Cabs Licenced in Oxford																NOx Commercial Vehicle	HCNOx	PM	NOx Commercial Vehicle	HCNOx	PM	Nox g/km	NOx Total per annum kg/km							
Age of Vehicle (First registration)	<2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	Grand Total														
Engine Type																														
E0	19	1														20	1.8	2	0.25	1440	1600	200	2.7	2160						
E1	23	4	2													29	1.5	1.7	0.25	1740	1972	290	2.4	2784						
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E4						1	7	9	9	6	8					40	0.39	0.46	0.06	624	736	96	1.3	2080						
E5												3	2	3		8	0.28	0.35	0.05	90	112	16	2.4	768						
Grand Total	48	5	7	1	3	1	7	9	9	6	8	3	2	3	0	112				4362	4936	662		8692						
																														kg
																g/ km per annum Standards classification Euro engines			Total kg/km per annum			Real World								
2023/24 Data for Hackney Cabs Licenced in Oxford																NOx Commercial Vehicle	HCNOx	PM	NOx	HCNOx	PM	NOx g/km	Total NOx kg/km per annum							
Age of Vehicle (First registration)	2006	2007	2008	2009	2010	2011	2012	2014	2015	2018	2019	2020	2021	2022	2023	Grand Total														
Engine Type																														
Euro 4 - TX4 (Diesel)	1	10	11	22	12	13	3	1								73	0.39	0.46	0.06	1138.80	1343.20	175.20	1.30	3796.00						
Euro 6 (Diesel)									1	1						2	0.125	0.215	0.005	10.00	17.20	0.40	1.00	80.00						
ULEV compliant - LEVC-TX - Euro 6 (petrol)										4		4	7	5	13	1	34	0.082	0.082	0.005	33.46	33.46	2.04	0.25	100.37					
Grand Total	1	10	11	22	12	13	3	2	1	4		4	7	5	13	1	109				1182.3	1393.9	177.6		3976.4					
Emissions Reduction %																				73%	72%	73%		54%						
100% ULEV COMPLIANT - EURO 6																	31%				107.256	107.256	6.54	0.25	0					
Emission Saved through 100% electrification																	% electrification				1075	1286.6	171.1		3976.4					
																g/ km per annum Standards classification Euro engines			Total kg/km per annum			Real World								
2024/25 Data for Hackney Cabs Licenced in Oxford																NOx Commercial Vehicle	HCNOx	PM	NOx	HCNOx	PM	NOx g/km	Total NOx kg/km per annum							
Age of Vehicle (First registration)	2007	2008	2009	2010	2011	2012	2014	2015	2018	2019	2020	2021	2022	2023	2024	Grand Total														
Engine Type																														
Euro 4 - TX4 (Diesel)	9	8	22	9	11	4	1									64	0.39	0.46	0.06	998.40	1177.60	153.60	1.30	3328.00						
Euro 6 (Diesel)									1					1		2	0.125	0.215	0.005	10.00	17.20	0.40	1.00	80.00						
ULEV compliant - LEVC-TX - Euro 6 (petrol)										4	6	7	6	13	4	2	42	0.082	0.082	0.005	41.33	41.33	2.52	0.25	123.98					
Grand Total	9	8	22	9	11	4	1	1	4	6		7	6	14	4	2	108				1049.7	1236.1	156.5		3532.0					
Emissions Reduction % 2023 to 2024																				11%	11%	12%		11%						
Emissions Reduction % 2018 to 2024																				76%	75%	76%		59%						
100% ULEV COMPLIANT - EURO 6																	39%				107.256	107.256	6.54	0.25	0					
Emission Saved through 100% electrification																	% electrification				942.472	1128.87	149.98		3532.0					

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## Why do an Equalities Impact Assessment (EqIA)?

1. Equalities Impact Assessment (EqIA) is part of Oxford City Council's **Public Sector Equality Duty (PSED) (Equality Act 2010)**.

The General PSED enables Oxford City Council to:

- a. **identify and remove discrimination,**
  - b. **identify ways to advance equality of opportunity,**
  - c. **foster good relations.**
2. An EqIA must be done before making any decision(s) that may have an impact on people and/or services that people use and depend on.
  3. An EqIA form is one of many tools that can simplify and structure your equalities assessment.
  4. We are passionate about equalities, and we highly recommend that [Corporate Management Team \(CMT\) reports and all projects must attach an EqIA.](#)

For questions, queries, and a chat about how to do your EqIA, please email your EDI officers:

1. Sobia Afridi- [safриди@oxford.gov.uk](mailto:safриди@oxford.gov.uk)

Please do refer to our [SharePoint Page](#) for support such as FAQs and Examples, etc.

## A good EqIA has the following attributes:

1. Comprehensively considers the **9 protected characteristics**.

1. Age	6. Race & Ethnicity
2. Disability	7. Religion or Belief
3. Gender Reassignment	8. Sex
4. Marriage & Civil Partnership	9. Sexual Orientation
5. Pregnancy & Maternity	<b>NEW-</b> Socio-economic inequalities (voluntary adoption)

2. It has **considered equality of treatment** towards service users, residents, employees, partners, council suppliers & contractors, and Council Members
3. Sufficiently considered **potential and real impact** of proposal or policy on service users, residents, employees, partners, council suppliers & contractors, and Council Members.
4. **Systematically recorded and reported** any potential and real impact of your proposal or policy on service users, residents, employees, partners, council suppliers & contractors, and Council Members
5. **Collected, recorded, & reported sufficient information and data** on how your policy or proposal will have an impact.
6. Offers **mitigations or adjustments** if a PSED has been impacted.
7. Provides clear **justifications** for your decisions.
8. It is written in **plain English** with simple short sentence structures.

## Section 1: General overview of the activity under consideration

1.	<b>Name of activity being assessed.</b>  <b>For example:</b> -New policy, -Review of existing policy, -Changes in service(s), -New project(s), etc.	Review of Hackney Carriage Emission standards, and consideration of delays to final phase.	2.	<b>The implementation date of the activity under consideration:</b>	22 <sup>nd</sup> September 2025
3.	<b>Directorate/Department(s):</b>	General Licensing	4.	<b>Service Area(s):</b>	Community Safety
5.	<b>Who is (are) the assessment lead(s):</b> <b>Please provide:</b> -Name -Email address	Joshua Curnow <a href="mailto:jcurnow@oxford.gov.uk">jcurnow@oxford.gov.uk</a>	6.	<b>Contact details, in case there are queries:</b> <b>Please provide:</b> -Name -Email address	Joshua Curnow <a href="mailto:jcurnow@oxford.gov.uk">jcurnow@oxford.gov.uk</a>
7.	<b>Is this a new or ongoing EqlA?</b>	New <input checked="" type="checkbox"/> Extension to existing EqlA <input type="checkbox"/>	8.	If this is an extension of a previous EqlA, please indicate where the previous EqlA is located and share the link to the said EqlA.	
9.	<b>Date this EqlA started:</b>	1 <sup>st</sup> September 2025			
10.	<b>Will this EqlA be attached to <a href="#">Corporate Management Team (CMT)</a> reports/updates, which will be published online?</b>	This EqlA will be attached to a report for the General Purposes Licensing Committee and then attached for full Council.	11.	<b>Give a date (tentative or otherwise) when this assessment will be taken to the CMT.</b>	22 <sup>nd</sup> September 2025



## Section 2: About the activity, change, or policy that is being assessed.

12.	<b>Type of activity being considered:</b>  Check the most appropriate.	<input type="checkbox"/> Budget	<input type="checkbox"/> Decommissioning	<input type="checkbox"/> Commissioning	<input checked="" type="checkbox"/> Change to an existing activity.	
		<input type="checkbox"/> New Activity	<input type="checkbox"/> Others. Please specify:			
13.	<b>Which priority area(s) <u>within Oxford City Council's Corporate strategy (2024-2028)</u> does this activity fulfil?</b>  Please check as needed.	<input type="checkbox"/> Good, affordable homes	<input checked="" type="checkbox"/> Strong, fair economy	<input checked="" type="checkbox"/> Thriving Communities	<input checked="" type="checkbox"/> Zero Carbon Oxford	<input type="checkbox"/> Well run council
14.	<b>Which priority area(s) within <u>Oxford City Council's Equality, Diversity &amp; Inclusion Strategy (2022)</u> does this activity fulfil?</b>  Please check as needed.	<input type="checkbox"/> Responsive services and customer care.	<input type="checkbox"/> Diverse and engaged workforce.	<input type="checkbox"/> Leadership & organisational commitment.	<input checked="" type="checkbox"/> Understanding and working with our communities.	
15.	<b>Outline the aims, objectives, &amp; priorities of the activity being considered.</b>	Consideration of a request to delay the final phase of the hackney carriage vehicle (HCV) emission standards, requiring all new and renewal HCV applications to meet Ultra-low emission standards (ULEV): The aim is for members of the General Purposes Licensing Committee to make an informed decision regarding the request and any amendment to the Policy.				

<p><b>16. Please outline the consequences of not implementing this activity.</b></p> <p><b>For example,</b></p> <ul style="list-style-type: none"> <li>-Existing activity does not fulfill Corporate Objectives,</li> <li>-existing activity is discriminatory and not fulfilling Council's PSED, ... to name a few.</li> </ul>	<p>It could be seen as unreasonable for the local authority to provide no additional consideration to the policy in light of the formal request for extension and additional report regarding affordability and emissions produced by the environmental sustainability team.</p>
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### Section 3: Understanding service users, residents, staff and any other impacted parties.

<p><b>17. Have you undertaken any consultations in the form of surveys, interviews, and/or focus groups?</b></p> <p><b>Please provide details—</b></p> <ul style="list-style-type: none"> <li>-when,</li> <li>-how many, and</li> <li>-the approach taken.</li> </ul>	<p><b>Public Consultation</b> took place for the February 2024 report that also considered a request to delay the emission standards for hackney carriage vehicles. Additional consultation has not taken place, as the options available to the committee have not changed.</p>
<p><b>18. List information and data used to understand who your residents or staff are and how they will be impacted.</b></p> <p><b>These could be-</b></p> <ul style="list-style-type: none"> <li>-third-party research,</li> <li>-census data,</li> <li>-legislation,</li> <li>-articles,</li> <li>-reports,</li> <li>-briefs.</li> </ul>	<ul style="list-style-type: none"> <li>• Consultation results</li> <li>• Licensing data</li> <li>• Guidance from the Equality and Human Rights Commission</li> <li>• 2021 ONS Census Data</li> <li>• Equality Act 2010</li> <li>• 'Justfair' Guidance regarding Socio-Economic Duty</li> </ul>

19.	<p><b>If you have not done any consultations or collected data &amp; information, are you planning to do so in the future?</b></p> <p><b>Please list the details –</b>          -when,          -with whom, and          -how long will you collect the relevant data.</p>	N/A
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## Section 4: Impact analysis.

20.	<b>Who does the activity impact?</b>	<b>Service Users</b>	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	Don't Know <input type="checkbox"/>
	<b>Check as needed.</b>  The impact may be positive, negative or unknown.	<b>Members of staff</b>	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	Don't Know <input type="checkbox"/>
		<b>General public</b>	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	Don't Know <input type="checkbox"/>
		<b>Partner / Community Organisation</b>	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	Don't Know <input type="checkbox"/>
		<b>City Councillors</b>	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	Don't Know <input type="checkbox"/>
		<b>Council suppliers and contractors</b>	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	Don't Know <input type="checkbox"/>

21.

Does the activity impact positively or negatively on any protected characteristics as stated within Equality (Act 2010)?

Check as needed and provide evidence-driven conclusions.

**Good Practice** is to keep it simple and list your, evidence, insights, and mitigations.

Protected Characteristic	Positive	Negative	Neutral	Don't know	Data/information/evidence supporting your assessment	Analysis & insight Mitigations
Age	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<ul style="list-style-type: none"> <li>Recorded age of proprietors.</li> <li>Equality and Human Rights Commission: Age Discrimination</li> <li>Equality and Human Rights Commission: Direct and Indirect Discrimination</li> </ul>	<p>The majority of current Hackney Carriage Vehicle proprietors fall evenly into the three age brackets 40-49, 50-59, and 60-69.</p> <p>Therefore, the emissions policy (requiring the transition to an ultra-low emission vehicle), and any amendments to it, may impact those aged 40 – 69 disproportionately.</p>
Disability (Visible and invisible)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<ul style="list-style-type: none"> <li>Equality and Human Rights Commission: Direct and Indirect Discrimination</li> </ul>	Any amendment to this policy has no direct or indirect impact on this protected characteristic.
Gender re-assignment	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<ul style="list-style-type: none"> <li>Equality and Human Rights Commission: Gender Reassignment discrimination</li> <li>2021 Gender Identity Census Data</li> </ul>	Any amendment to this policy has no direct or indirect impact on this protected characteristic.

					<ul style="list-style-type: none"> <li>Equality and Human Rights Commission: Direct and Indirect Discrimination</li> </ul>	
<b>Marriage &amp; Civil Partnership</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<ul style="list-style-type: none"> <li>Equality and Human Rights Commission: Marriage and civil partnership</li> <li>Equality and Human Rights Commission: Direct and Indirect Discrimination</li> </ul>	Any amendment to this policy has no direct or indirect impact on this protected characteristic.
<b>Race, Ethnicity and/or Citizenship</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<ul style="list-style-type: none"> <li>Vehicle owner and Driver data.</li> <li>Equality and Human Rights Commission: Direct and Indirect Discrimination</li> <li>Equality and Human Rights Commission: Race Discrimination</li> <li>ONS Census data 2021</li> </ul>	<p>Nearly all the hackney carriage vehicles licensed by Oxford City Council are owned by people of Pakistani heritage. Those from a Pakistani heritage represent 1.5% of the Oxfordshire population.</p> <p>Therefore, the emissions policy (requiring the transition to an ultra-low emission vehicle), and any amendments to it, may impact those of a Pakistani heritage disproportionately.</p>
<b>Pregnancy &amp; Maternity</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<ul style="list-style-type: none"> <li>Equality and Human Rights Commission: Pregnancy and maternity Discrimination</li> <li>Equality and Human Rights Commission: Direct and Indirect Discrimination</li> </ul>	Any amendment to this policy has no direct or indirect impact on this protected characteristic.
<b>Religion or Belief</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<ul style="list-style-type: none"> <li>Equality and Human Rights Commission:</li> </ul>	Any amendment to this policy has no direct or indirect impact on this protected characteristic.

					Religion or belief Discrimination <ul style="list-style-type: none"> <li>Equality and Human Rights Commission: Direct and Indirect Discrimination</li> </ul>	
<b>Sex</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<ul style="list-style-type: none"> <li>Equality and Human Rights Commission: Sex Discrimination</li> <li>Equality and Human Rights Commission: Direct and Indirect Discrimination</li> </ul>	Any amendment to this policy has no direct or indirect impact on this protected characteristic.
<b>Sexual Orientation</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<ul style="list-style-type: none"> <li>Equality and Human Rights Commission: Sexual Orientation Discrimination</li> <li>Equality and Human Rights Commission: Direct and Indirect Discrimination</li> </ul>	Any amendment to this policy has no direct or indirect impact on this protected characteristic.

<b>Socio-economic inequalities such as:</b>  - income and factors that impact income. -access to jobs  This was voluntarily adopted by <a href="#">Oxford City Council on the 13<sup>th</sup> of March 2024.</a>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<ul style="list-style-type: none"> <li>• 'Justfair' Guidance: Socio-Economic Duty</li> <li>• Licensing Data</li> </ul>	<p>The hackney carriage emission policy requires those with lower emission vehicles to upgrade to ultra-low emission vehicles from 1<sup>st</sup> January 2026.</p> <p>This is a significant investment for vehicle owners, of the 107 vehicles licenced, there are 67 that will require upgrading from 2026.</p> <p>Any extension to the policy will positively impact vehicle owners who have not upgraded but may negatively impact those that transitioned their vehicles before the deadline.</p>
<b>Other (voluntary consideration)</b>  <b>For example:</b>  Migrant, refugee, or asylum seekers.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	N/A	N/A
<b>Other</b> <b>For example:</b> <ul style="list-style-type: none"> <li>- Unpaid carers</li> <li>- Prison population</li> <li>- Homeless population</li> <li>-Council suppliers &amp; contractors</li> <li>-Cabinet Members</li> </ul>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	N/A	N/A

## Section 5: Conclusion(s) of your Full Impact Assessment

22.	<b>Conclusions.</b> Check as needed.			
	<input type="checkbox"/> Stop and reconsider the activity.	<input type="checkbox"/> Adjust activity before beginning the activity and continue to monitor.	<input checked="" type="checkbox"/> No major change(s) or adjustments and continue with activity but continue to monitor.	<input type="checkbox"/> No major change(s) or adjustments and continue with the activity. No need to monitor in the future.
23.	<p><b>Please explain how you have reached your conclusions above.</b></p> <p>This assessment identifies that the current Hackney Carriage Vehicle (HCV) emissions policy will primarily affect vehicle owners and licence holders. Any extension to the implementation date would provide financial relief to those who have not yet upgraded their vehicles to meet the Ultra-Low Emissions Vehicle (ULEV) standard, currently 67 vehicles. However, such an extension may result in a financial disadvantage for early adopters of ULEV vehicles, currently 40 vehicles, who have already made significant investment in compliance.</p>			

## Section 6: Monitoring and review plan.

The responsibility for maintaining a monitoring arrangement of the EqIA action plan lies with the service/team completing the EqIA. These arrangements must be built into the performance management framework such as KPIs or Risk Registers.

24.	<p><b>Who or which team or service area will be responsible for monitoring equalities impact?</b></p> <p>For example-</p>	<p>General Licensing Team, Community Safety</p>
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	<ul style="list-style-type: none"> <li>- team,</li> <li>-directorate,</li> <li>-service area,</li> <li>-Equalities Steering Group,etc.</li> </ul>				
25.	<b>Who (individual, team, or service area) will be responsible for carrying out the EqlA review?</b>	General Licensing Team			
26.	<b>How often will the equality impact be reviewed for this activity?</b> <b>For example-</b> <ul style="list-style-type: none"> <li>-quarterly,</li> <li>-yearly, etc.</li> </ul>	<table> <tr> <td data-bbox="647 507 1196 727">This policy will form part of the wider policy alignment for Local Government Reorganisation, review of the equality impact of the policy will take place as part of that process.</td><td data-bbox="1196 507 1697 727"> <b>27. Date when the EqlA will be reviewed again.</b> </td><td data-bbox="1697 507 2168 727">~2028</td></tr> </table>	This policy will form part of the wider policy alignment for Local Government Reorganisation, review of the equality impact of the policy will take place as part of that process.	<b>27. Date when the EqlA will be reviewed again.</b>	~2028
This policy will form part of the wider policy alignment for Local Government Reorganisation, review of the equality impact of the policy will take place as part of that process.	<b>27. Date when the EqlA will be reviewed again.</b>	~2028			

## Section 7: Sign-off

Name: Joshua Curnow

Job Title: Licensing Team Manager

Signature:



Name: Tom Hook

Job Title: Deputy Chief Executive

Signature:



Name: Full Name

Job Title: Type here

Signature:

Name: Abby Abrahams

Job Title: Solicitor

Signature: Abby Abrahams

Name: Full Name

Job Title: Type here

Signature:

Name: Full Name

Job Title: Type here

Signature:

Name:

Job Title:

Signature:

Name: Full Name

Job Title: Type here

Signature:

Name: Full Name

Job Title: Type here

Signature:

### Suggested list of people to include are:

- 1) Project lead/manager.
- 2) Head of service area or team.
- 3) Person who completed the EqIA.
- 4) EDI Lead.
- 5) EDI Specialist.
- 6) For joint projects, please consider the following:
  1. Other project leads
  2. Other service area and/or team lead/managers.

**This is not an exhaustive list.**

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**You have now reached the end of the assessment.**

 Please appended this to any reports and project files for reference.



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**To:** Cabinet  
**Date:** 22 October 2025  
**Report of:** Scrutiny Committee  
**Title of Report:** Recommendations from the Scrutiny Committee

Summary and recommendations	
<b>Decision being taken:</b>	To submit the recommendations of the Scrutiny Committee for Cabinet's consideration.
<b>Key decision:</b>	No
<b>Lead Member:</b>	Councillor Alex Powell, Chair of the Scrutiny Committee
<b>Corporate Priority:</b>	A Well-Run Council
<b>Policy Framework:</b>	None

<b>Recommendation(s): That Cabinet:</b>
1. <b>Considers and responds</b> to the recommendations made by the Scrutiny Committee as set out in the report.

Information Exempt From Publication	
N/A	N/A

Appendix No.	Appendix Title	Exempt from Publication
N/A	N/A	N/A

## Overview and Summary

- The Scrutiny Committee met on 14 October 2025 and reviewed the following items:
  - Project Approval and Delegations for Westlands Drive and Halliday Hill affordable housing scheme
  - Anti-Social Behaviour Policy
  - Annual Safeguarding Report

2. Working Group meetings were also held to consider a range of reports:

**Finance and Performance Working Group on 11 September 2025**

- Optimism bias on sizeable commercial properties in the city centre
  - Performance Integrated Report Q4 2024/25
  - Performance Integrated Report Q1 2025/26
3. Following the meetings, Cabinet Members, in consultation with the relevant Officers were asked to agree, agree in-part, or disagree with the recommendations.
4. The tables below detail the recommendations made by the Committee for each report, which Cabinet will consider at their meeting on 22 October 2025. Cabinet has provided a commentary on each recommendation to inform the Committee of the rationale behind its decision. No table was produced for items where no recommendations were suggested.
5. Minutes of the Scrutiny meeting on 14 October 2025 is available [here](#).
6. The Scrutiny Committee would like to thank Cabinet Members Cllr Linda Smith (Housing and Communities), Cllr Lubna Arshad (A Safer Oxford) and Cllr Ed Turner (Deputy Leader (Statutory) – Finance and Asset Management) for their contributions. The Committee was also grateful to Dave Scholes (Affordable Housing Supply Corporate Lead), Richard Adams (Community Safety Service Manager), Laura Jones (Safeguarding Coordinator), Emma Gubbins (Corporate Assets Lead), Jane Winfield (Director of Property and Assets), Nigel Kennedy (Group Finance Director) and Clare Paterson (Strategic Finance Manager) for presenting reports and responding to questions.

**Financial implications**

7. Financial implications for the reports listed above were outlined within the reports presented at Scrutiny Committee or Working Group.
8. Where appropriate, any further financial implications were reviewed when considering the recommendations.

**Legal issues**

9. Legal implications for the reports listed above were outlined within the reports presented at Scrutiny Committee or Working Group.
10. Where appropriate, any further legal implications were reviewed when considering the recommendations.

**Level of risk**

11. Risk Registers, where appropriate, were linked to the reports presented at Scrutiny Committee or Working Groups.
12. Where appropriate, the risk register was reviewed when considering the recommendations.

**Equalities impact**

13. Equalities Impact Assessments, where appropriate, were linked to the reports presented at Scrutiny Committee or Working Groups.

14. Where appropriate, the Equalities Impact Assessments was reviewed when considering the recommendations.

### **Carbon and Environmental Considerations**

15. Consideration for Carbon and Environmental impacts, where appropriate, were linked to the reports presented at Scrutiny Committee or Working Groups.

16. Where appropriate, the Carbon and Environmental impacts were reviewed when considering the recommendations.

<b>Report author</b>	Celeste Reyeslao
Job title	Scrutiny and Governance Advisor
Service area or department	Law, Governance and Strategy
Telephone	01865 252946
e-mail	<a href="mailto:creyeslao@oxford.gov.uk">creyeslao@oxford.gov.uk</a>

**Table 1 – Draft Cabinet response to recommendations of the Scrutiny Committee –  
Anti-Social Behaviour Policy**

The table below sets out the draft response of the Cabinet Member to recommendations made by the Scrutiny Committee on 14 October 2025 concerning the Anti-Social Behaviour Policy. The Cabinet is asked to amend and agree a formal response as appropriate.

<b>Recommendation</b>	<b>Agree?</b>	<b>Comment</b>
1) For Officers to explore the feasibility of gathering and analysis of data on protected characteristics of both: individuals complained about through the ASB service, and individuals making complaints through the ASB service. Recognising that some data may be limited in validity, that findings from the collected and analysed data be reported back to the Scrutiny Committee at an appropriate time within the next two years.	Yes	We accept this recommendation.
2) That officers set out within the Policy the work the Council is currently undertaking and plans to undertake in relation to proactive prevention of ASB, including actions such as working with youth groups, redesigning areas, and improving coordination between council services.	Yes	The policy will include a broad policy statement on prevention activities, working in partnership to achieve these goals. It won't give details of specific interventions that could change during the life of policy.
3) That there is a clear commitment within the ASB Policy to work collaboratively with Registered Providers in addressing anti-social behaviour, including requesting information from local RPs on levels and types of ASB reports received within their housing stock. This information can then be used to identify patterns, overlaps and gaps between council and RP data, and	Yes	We accept this recommendation.



reporting back on the efficacy of this partnership working and health of relationships with RPs as part of the Council' wider multi-agency approach to ASB management.		
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**Table 2 – Draft Cabinet response to recommendations of the Scrutiny Committee –  
Annual Safeguarding Report**

The table below sets out the draft response of the Cabinet Member to recommendations made by the Scrutiny Committee on 14 October 2025 concerning the Annual Safeguarding Report. The Cabinet is asked to amend and agree a formal response as appropriate.

<b><i>Recommendation</i></b>	<b><i>Agree?</i></b>	<b><i>Comment</i></b>
1) That future Safeguarding reports provide comparisons with previous years data to allow monitoring of trends and assessment progress, particularly data in relation to modern slavery and exploitation, and severe weather emergency protocol (SWEP). Where the data allows for trend analysis, that previous statistics be included to enable a year-on-year comparison and evaluation of changes overtime.	Yes	Previous years' data to be included in future safeguarding reports to allow for year-on-year trend analysis.

By virtue of paragraph(s) 3 of Part 1 of Schedule 12A  
of the Local Government Act 1972.

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