

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

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

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 23rd 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 29th 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'*

- 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

- 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.
- 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 1st 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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