

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

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

Appendices	
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 taxis¹ which show that EURO 5² 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 1st 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 1st 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 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;
- D. From 1st 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 st 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 st 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 st 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.

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

² 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 st July 1992	Euro 1
From 1 st January 1996	Euro 2
From 1 st January 2000	Euro 3
From 1 st January 2005	Euro 4
From 1 st September 2009	Euro 5
From 1 st 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."²
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,

²See <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: 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:	
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'*

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 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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Summary and recommendations	
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14. The recommended requirement:

- A. From 1st 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”
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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.

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29th 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
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial					2023-11-14 13:40:42
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
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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		Personal			2023-11-14 14:21:06
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial					2023-11-14 14:36:16
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial				Supporting Taxi Trade	2023-11-14 14:38:06
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial		Personal	Vehicle	Supporting Taxi Trade	2023-11-14 14:57:15
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial					2023-11-14 15:02:33

I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial					2023-11-14 15:20:39
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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 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
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial					2023-11-14 16:13:16
I support delaying the requirement for all Taxis to be ULEV by three years (January				Vehicle	Supporting Taxi Trade	2023-11-14 16:59:22
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
I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial	Emissions	Personal	Vehicle	Supporting Taxi Trade	2023-11-14 17:49:16
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I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial					2023-11-14 22:50:28
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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 10:45:24
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I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial				Supporting Taxi Trade	2023-11-18 16:46:23
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I support delaying the requirement for all Taxis to be ULEV by three years (January	Financial				Supporting Taxi Trade	2023-11-18 20:48:37
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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>	Option 1	Option 2	Option 3	Option 2
	New LEVC-TX Leased	New LEVC-TX Bought	2019 LEVC-TX Bought	2013 Euro 4 Bought
Net purchase price (after grants)		£ 64,842	£ 42,500	£3,000
Purchase/lease	Lease	Purchase	Purchase	Purchase
Total cost per annum using 30% petrol	£18,191	£14,009	£11,449	£10,578
Total cost per annum 100% electric	£19,229	£15,047	£12,487	£10,578
Cost per mile	£0.73	£0.56	£0.46	£0.42
NOx Emissions g/per mile	0.13	0.13	0.13	0.62
PM Emisisions 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 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)

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

ANNEX1: Comparative Costs of Hackney Ownership.

Vehicle	Option 1	Option 2	Option 3	Option 2
	New LEVC-TX Leased	New LEVC-TX Bought	2019 LEVC-TX Bought	2013 Euro 4 Bought
Net purchase price (after grants)		£ 64,842	£ 42,500	£ 3,000
Purchase/lease	Lease	Purchase	Purchase	Purchase
Running Costs (annual)				
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
Lease cost (annual)/Interest	£12,482	£3,891	£2,550	£180
Depreciation		£4,409	£2,890	£450
Total Cost	£12,482	£8,300	£5,440	£630
Total cost per annum using 30% petrol	£18,191	£14,009	£11,449	£10,578
Total cost per annum 100% electric	£19,229	£15,047	£12,487	£10,578
Cost per mile	£0.73	£0.56	£0.46	£0.42
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

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



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

15 Belvedere Road,
Oxford, OX4 2AZ
coltaoxford@outlook.com
Tel: 07702031372

11th 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 10th 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 flourish.

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_x, HCNO_x 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_x 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_x emissions to PHV and considerably lower particle emissions. Overall, Hackney NO_x 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
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 Emisisions g/per mile	0.008	0.008	0.008	0.096

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)

https://dieselnet.com/standards/eu/ld.php																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								
Age of Vehicle (First registration)	<2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	Grand Total	NOx Commercial Vehicle	HCNOx	PM	NOx Commercial Vehicle	HCNOx	PM	Nox g/km	NOx Total per annum kg/km						
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						
																														kg
2023/24 Data for Hackney Cabs Licenced in Oxford																g/ km per annum Standards classification Euro engines			Total kg/km per annum			Real World								
Age of Vehicle (First registration)	2006	2007	2008	2009	2010	2011	2012	2014	2015	2018	2019	2020	2021	2022	2023	Grand Total	NOx Commercial Vehicle	HCNOx	PM	NOx	HCNOx	PM	Nox g/km	Total NOx kg/km per annum						
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																	0.082	0.082	0.005	107.256	107.256	6.54	0.25	0						
Emission Saved through 100% electrification																	% electrification				1075	1286.6	171.1		3976.4					
																														No real world data - this is estimated
2024/25 Data for Hackney Cabs Licenced in Oxford																g/ km per annum Standards classification Euro engines			Total kg/km per annum			Real World								
Age of Vehicle (First registration)	2007	2008	2009	2010	2011	2012	2014	2015	2018	2019	2020	2021	2022	2023	2024	Grand Total	NOx Commercial Vehicle	HCNOx	PM	NOx	HCNOx	PM	Nox g/km	Total NOx kg/km per annum						
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																	0.082	0.082	0.005	107.256	107.256	6.54	0.25	0						
Emission Saved through 100% electrification																	% electrification				942.472	1128.87	149.98		3532.0					
																														No real world data - this is estimated

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