

**To:** Cabinet

**Date:** 19 November 2025

**Report of:** Deputy Chief Executive, Citizen and City Services

**Title of Report:** Deferral of the commencement of the Hackney Carriage Vehicle Emission Standards

Summary and recommendations	
<b>Decision being taken:</b>	To consider a delay to the final phase of emission standards for Hackney Carriage Vehicles licensed by this Authority.
<b>Key decision:</b>	Yes  <a href="#">Issue details - Hackney Carriage Vehicle Emission Standards   Oxford City Council</a>
<b>Cabinet Member:</b>	Councillor Anna Railton. Deputy Leader, and Cabinet Member for a Zero Carbon Oxford
<b>Corporate Priority:</b>	Strong, Fair Economy; Thriving Communities; Zero Carbon Oxford.
<b>Policy Framework:</b>	No

<b>Recommendation(s):</b> That Cabinet resolves to:
1. <b>Approve</b> the delay to the implementation on the 1 January 2026 of the Ultra-Low Emissions Vehicle Standards for hackney carriage vehicles, to be revisited by such successor organisation that results from Local Government Reorganisation

Information Exempt From Publication	
<b>Appendix 1 – Advice from Counsel</b>	<p>This information is exempted from publication under Schedule 12A to the Local Government Act 1972:</p> <p>This is Information that could be considered legally privileged Information in respect of which a claim to legal professional privilege could be maintained in legal proceedings</p>

<b>Appendix No.</b>	<b>Appendix Title</b>	<b>Exempt from Publication</b>
<b>Appendix 1</b>	Advice from Counsel	Yes  This information is exempted from publication under Schedule 12A to the Local Government Act 1972 on the following basis:  Information that could be considered legally privileged Information in respect of which a claim to legal professional privilege could be maintained in legal proceedings
<b>Appendix 2</b>	Report to the GLPC on 22 September 2025	No
<b>Appendix 3</b>	COLTA delay request	No
<b>Appendix 4</b>	2025 Affordability and Emissions Report	No
<b>Appendix 5</b>	Equality Impact Assessment	No

## **Introduction and background**

1. This report is before Cabinet because of external Counsel advice that was sought in relation to the proper decision-making path for the Ultra-Low Vehicle Emissions Standards for hackney carriage vehicles ("Emissions Standards"). A copy of the advice summary can be found at confidential Appendix 1 to this report.
2. Historically such policies have been recommended by the General Purposes Licensing Committee ("GPLC") to Full Council for approval in line with Part 5.6 of the Constitution.
3. Under the Local Authorities (Functions and Responsibilities) (England) Regulations 2000 ("the Regulations") it lists in Schedule 1, paragraph b the matters which should not be a decision of an authority's executive (Cabinet). These are:
  - a. Licensing hackney carriages and Private Hire Vehicles ("PHVs")
  - b. Licensing drivers of hackney carriages and PHVs
  - c. Licensing operators of hackney carriages and PHVs
4. All other decisions concerning taxi licensing can either be a Cabinet function or a function of Full Council, however the default position is that they fall to Cabinet unless Full Council make a positive and explicit decision to keep the decision making with Full Council.

5. Historically, since its first adoption, Oxford City Council has approved in its Constitution at Part 5.6 that decisions on taxi licensing (including hackney carriage vehicles are for Full Council. This has been consistently adopted by Council with each amendment to the Constitution.
6. Officers have therefore dealt with decision making on policies such as the Emissions Standards since by ensuring their referral from GPLC to Full Council in line with the Constitution.
7. Owing to confusion on the part of officers at the recent GPLC on the 22 September 2025 advice was sought from Counsel on Councils provision for decision making in the Constitution.
8. That advice has confirmed that, owing to there being no explicit recommendation of Full Council which can be located in historic minutes that the function remain with Full Council, under the operation of the Regulations the function properly rests in default with Cabinet.
9. The intention is that at the next meeting of Full Council an explicit ratification of the approval by Full Council of all Taxi licensing policies. In the meantime however time constraints require this report to come to Cabinet to ask it to take a decision as to the delay of the commencement of the Emissions Standards, due to take effect in January 2026.
10. Whilst it would be possible to take the matter to Full Council at the same time as the Constitutional changes it will lead to further uncertainty for the hackney carriage sector who will, if not approved, need to be taking steps to comply. As such it is considered appropriate to bring this to Cabinet for consideration as the proper identified decision maker following the Counsel's advice provided.
11. Officers apologise to both Cabinet and Members of the GLPC for the issues this has caused. The advice raises very technical points of law and, in good faith, officers had considered that the power was properly reserved to Full Council.

### **Ultra Low Vehicle Emissions Standards for Hackney Carriages**

12. On the 22 July 2019 the Emissions Standards for hackney carriage vehicles was formally adopted by the Council following recommendation for approval by the General Purposes Licensing (GPL) Committee on 23 January 2019. The purpose of the standard was to reduce emissions in the taxi fleet and improve air quality in the City.
13. On 18 March 2024 Full Council approved an amendment to the Emission Standards for HCVs, by extending the final phase for compliance from 1 January 2025 to 1 January 2026. This was based on a recommendation from the GPLC on the 5 February 2024. The 2024 GPLC report can be found at Appendix Two.
14. The current HCV emission standards, as adopted by the Council are:

<b>Date From</b>	<b>Renewal HCV Applications</b>	<b>New HCV Applications</b>

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

15. As of September 2025, 40 out of 107 licensed hackney carriage vehicles have transitioned to meet the ULEV standard, along with 3 out of 4 currently licenced temporary vehicles. This means 67 licensed HCVs and 1 temporary vehicle still need to upgrade to meet the ULEV standard from the 1<sup>st</sup> January 2026.
16. On 11th April and 22nd July 2025, the City of Oxford Licensed Taxicab Association (COLTA) formally requested that the Council postpone the final phase of the Hackney Carriage Vehicle (HCV) emission standards, currently set for implementation on 1st January 2026, by an additional two years, extending the deadline to 2028. This can be found at Appendix 3. In that COLTA cited the following reasons in support of their request:
  - Financial hardship.
  - Impact of the evolving private hire trade.
  - Uncertainty regarding hackney carriage quantity control.
  - Local infrastructure challenges, including road closures and delays to the Zero Emission Zone.
  - Uncertainty regarding local government reorganisation.
17. On 22nd September 2025, GLPC agreed to recommend to Council a postponement of the final phase until the establishment of a new unitary council under the Local Government Review, aligning the policy with wider structural changes and enabling consistent standards across the new licensing authority.
18. To support making an informed decision, the Environmental Sustainability Team produced an updated report examining key factors affecting the hackney carriage market. The report explores:

- The affordability of electric hackney carriages, including ownership and running costs.
- The impact of reduced government grants, rising energy, and borrowing costs.
- Comparative cost scenarios between electric and diesel vehicles.
- Emissions reductions achieved since the introduction of licensing standards.
- Implications of Zero Emission Zone (ZEZ) charges and delays to its expansion.

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

19. By comparison to neighbouring authorities Oxford City Council is leading the way for low emission hackney carriage vehicles, with the current requirement of ULEV standard from 2026:
  - South Oxfordshire District Council & Vale of White Horse District Council aim for zero-carbon by 2030 but currently only require Euro 6 by 2026.
  - Cherwell District Council sets a later ULEV deadline of 2030 for new applications, and 2033 for renewals.
  - West Oxfordshire District Council has no formal ULEV requirement at present.
20. Since the adoption and amendment of the Emissions Standards, government have launched a national Local Government Reorganisation programme (“LGR”). Implementation is expected by 2028 and will result in a reshaping of Oxfordshire’s council structure. In all three proposals put forward there will be a significant increase in the hackney carriage from that which is currently in each authority, as they will be combined across either one, two or three new authorities, as opposed to the 5 current constituent licensing authorities (including West Berkshire who are involved in the reorganisation as set out in two of the three proposals).
21. Based on March 2025 County wide data, a single Oxfordshire-wide authority would license approximately 1,068 hackney carriages, an increase of 898% compared to Oxford City alone. A two-unitary model would create one authority with around 332 vehicles (Oxford City, Cherwell, West Oxfordshire), an increase of 210%. A three-unitary model is less precise due to the boundary proposal, but estimates suggest a Greater Oxford fleet of 300–350 vehicles, an increase of 180–227%.

## **Conclusion**

22. Cabinet is asked to consider deferring the 1 January 2026 implementation of the final phase of the Hackney Carriage Vehicle (HCV) emission standards in light of several key factors:
  - a. The City of Oxford Licensed Taxicab Association (COLTA) request for a two-year extension to the current policy deadline as outlined above.
  - b. The Environmental Sustainability Team’s updated assessment of the hackney carriage market, confirming that significant progress has been made in reducing emissions, but also highlighting the increasing financial

pressures faced by vehicle owners, particularly those without access to home charging.

- c. The further complexity brought about as a result of the ongoing Local Government Reorganisation, which will result in a significant increase in the number of vehicles within the new licensing areas that do not currently and will not meet Oxford City's ULEV standard. Aligning these standards will be a priority for the shadow authority, and any decision taken now will have implications for the future policy alignment.

- 23. Any future decision on an emissions policy for hackney carriages would be a matter for the newly formed authorities resulting from LGR.

### **Alternative Options Considered**

#### **A. Maintain the current policy**

Retain the existing implementation date of 1st January 2026, requiring all new and renewal HCV applications to meet the Ultra-Low Emissions Vehicle standard. This is not proposed due to the complexities as set out in the report.

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

Amend the policy to defer the final phase by 12 months, setting a new implementation date of 1st January 2027, allowing additional time for transition while maintaining momentum towards the Council's environmental objectives. This will not remove the complexities of LGR.

### **Other implications**

#### **Financial implications**

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

#### **Legal issues**

- 25. Though the decision is still stated as a matter for Full Council in the Constitution Part 2.1 states that the Council will follow the Constitution unless it conflicts with the law. As set out in the report that is currently the case as advised by Counsel. As such it is considered that in this case the Constitution does not apply and Cabinet is able to take the decision in line with the Regulations.
- 26. All other legal implications are contained within the report.

#### **Level of risk**

- 27. This decision presents several key risks: potential emissions impacts as detailed in the 'Affordability and Emissions Report', which may conflict with the Council's environmental objectives; financial implications for existing hackney carriage proprietors, potentially affecting their viability and competitiveness; and misalignment with the Local Government Reorganisation policy timetable, where acting prematurely could necessitate future reversal or adjustment of decisions,

undermining policy coherence. Additionally, this decision may create a perception of unfairness among proprietors who have already invested in ULEV standard hackney carriage vehicles.

### **Equalities impact**

28. This is considered in the attached Equalities Impact Assessment at Appendix 5 of this report.

### **Carbon and Environmental Considerations**

29. These are set out in the report and appendices.

### **Conclusion**

30. In conclusion Cabinet is asked to consider delaying the implementation of the Emissions Standards as set out in the recommendations. Based on advice this is to be taken by Cabinet to provide a decision and certainty sooner, before the governance and decision making issues are resolved by Full Council later this month.

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<b>Background Papers:</b>	
1	<a href="#">Council Approval July 2019</a>
2	<a href="#">Council Approval March 2024</a>
3	<a href="#">Agenda for General Purposes Licensing Committee on Wednesday 23 January 2019, 6.15 pm   Oxford City Council</a>

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