

STROUD DISTRICT COUNCIL

COMMUNITY SERVICES AND LICENSING COMMITTEE

THURSDAY, 1 DECEMBER 2022

Report Title	VEHICLE EMISSIONS POLICY FOR TAXI AND PRIVATE HIRE VEHICLES FOR CONSULTATION			
Purpose of Report	Committee to consider an Interim Taxi and Private Hire Vehicle Emissions Policy as proposed by the Taxi Emissions Task and Finish Group and to approve it prior to formal consultation.			
Decision(s)	The Committee RESOLVES to: a) Approve the Interim Taxi and Private Hire Vehicle Emissions policy for formal consultation as laid out in paragraph 6.1 of this report. b) Approve the timetable for consultation and adoption as laid in paragraph 6.2 of this report.			
Consultation and Feedback	Task and Finish Group invited trade representatives to a meeting to discuss proposal Informal consultation with taxi trade 11th - 31st October 2022			
Report Author	Rachel Andrew, Licensing Manager Email: rachel.andrew@stroud.gov.uk			
Options	None			
Background Papers	The Council Plan 2021-2026 Outcome of Government Consultation on ending sale of diesel and petrol vehicles			
Appendices	Appendix A - Informal Consultation Responses Appendix B – Equality Impact Assessment			
Implications (further details at the end of the report)	Financial	Legal	Equality	Environmental
	No	Yes	Yes	Yes

1. INTRODUCTION / BACKGROUND

1.1 Stroud District Council's Council Plan for 2021-2026 has the following action:

EC4.4 'Review taxi and private hire licensing conditions to consider moving from an 'age' condition to an 'emissions'-based condition to encourage an increase in the percentage of low and Ultra Low Emission Vehicles.

1.2 This action links to the Council's priority on Environment and Climate Change with the aim of protecting our environment and leading the district to carbon neutrality in 2030.

2. STROUD DISTRICT COUNCIL'S CURRENT AGE POLICY

2.1 The current vehicle age policy for taxi and private hire vehicles was adopted in 2017. It provides:

- A new application for a vehicle licence or an application to change the vehicle will be refused if a vehicle is more than 5 years old from date of first registration
- An application to renew a vehicle licence will be refused if the vehicle is more than 10 years old from date of first registration
- Wheelchair accessible vehicles (WAVS) are exempt from the above age policy
- Electric Vehicles (EVs) are exempt from the above age policy
- Licensing Officers have the discretion to exempt elite vehicles from the above age policy such as BMW, Mercedes, Rolls Royce or similar provided the vehicle is in excellent condition.

2.2 Stroud District Council currently has 145 licensed taxi and private hire vehicles. (November 2022). There are currently only two electric vehicles. A Tesla registered in 2014 and a KIA EV6 registered in 2022. Currently 55 vehicles are below Euro 6 or EV compliance levels for emissions. Of those 55 vehicles, 17 are classed as elite and 7 are wheelchair accessible so 24 are currently exempted from the Council's vehicle age policy plus one electric vehicle. The remaining 30 vehicles will be over 10 years old by September 2025 and so could not be renewed after that date under the current age policy. There are 11 wheelchair accessible taxis (WAVs) of which only 3 are Euro 6 compliant.

2.3 In summary, currently 62% of all licensed vehicles are currently Euro 6 or EV compliant and only 27% of the wheelchair accessible taxis are currently Euro 6 or EV compliant.

3 DEFINITIONS EURO 6, ULEV AND EV

3.1 The euro emissions standards are regulations that define the acceptable amount of exhaust emissions vehicles can release. Euro 6 is the current compliance level for petrol and diesel vehicles and applies to all vehicles registered from 1st September 2015.

3.2 Older vehicles which are not Euro 6 compliant generate higher emissions and pollutants. Older diesel vehicles in particular produce higher levels of nitrogen oxides and particulates which can have serious health implications.

3.3 Ultra-Low Emission Vehicles (ULEVs) have very low emissions and emit less than [75g] of CO₂ per km. They include pure electric vehicles and plug in hybrid vehicles. Plug in hybrids can travel longer distances on electric power only than a non plug in hybrid vehicles.

3.4 Electric Vehicles (EVs) are pure electric vehicles and have no emissions.

- 3.5 The Government's intention is that the sale of new petrol and diesel cars and vans will end by 2030, with all new cars and vans being fully zero emission from 2035. There is information about this on the [Government website](#).

4 OTHER AUTHORITIES

- 4.1 There is no national guidance for local authorities on standards for taxi and private hire vehicle age and emissions. Each authority has different local conditions based on local needs.
- 4.2 Some large urban cities such as London have a policy of EVs only, others have policies based on Euro 6 compliance and many still have just an age policy or no policy at all.
- 4.3 Some inner-city areas, with high pollution levels, have introduced Clean Air Zones where a charge is made to enter for vehicles, including taxi and private hire vehicles, which are below Euro 6 compliance for diesel vehicles or below Euro 4 compliance for petrol vehicles.
- 4.4 In Gloucestershire most of the local authorities currently have or are planning to have a combined age/emissions policy based on Euro 6 compliance. All have an ambition for all EV fleets but none have set any timescales so far.

5 TAXI EMISSIONS TASK AND FINISH GROUP

- 5.1 The Community Services and Licensing Committee agreed in June 2022 to set up a Task and Finish Group made up of Councillors Jonathon Edmunds, John Jones and Nigel Prenter to develop a taxi and private hire vehicle emissions policy. The group has been supported by the Licensing Manager and Licensing Officers.
- 5.2 The group has met 4 times to consider the matter and to agree a proposal to report to this Committee. Trade representatives were invited to one of those meetings to seek their views.
- 5.3 Additionally, once an initial proposal was agreed by the group, an informal consultation was undertaken in October 2022 asking all taxi and private hire licence holders for their views on a draft proposal.
- 5.4 The Task and Finish group made the following observations and conclusions.
- 5.5 **EV charging infrastructure** - An EV charging infrastructure is starting to be developed both nationally and in Stroud District. Gloucestershire County Council is focusing on kerb side residential charging points. Stroud District Council is developing a roll out of chargers in Stroud District Council car parks which should take place in stages over the next 1-3 years. The chargers installed in car parks are initially going to be fast chargers (97-25KW AC) which take 4-6 hours for a full charge. Taxi and private hire businesses with EVs are

likely to do their main charge from home but would need locations to top up between jobs. Those that undertake airport runs are likely to take advantage of the rapid and ultra rapid chargers at motorway service stations and airports. These can take between 30 minutes and 1 hour for a full charge. It has been suggested that any chargers in Stroud District Council car parks for taxis should be rapid chargers (50-120 KW DC) and these may be considered in later phases of the charger roll out.

5.6 **Grants** – there are no local grants currently available for the taxi and private hire trade to invest in ULEVs or Euro 6 vehicles. The only national grant is for new purpose-built ULEV taxis. The grant is up to £7,500 which is taken off at the point of sale. The only vehicles that meet these criteria currently are London cab style vehicles which are very expensive to buy new.

5.7 **Views of the Taxi Representatives** - early discussions with representatives of the trade showed that the trade did not feel the time was right for investment in EVs. Concerns they raised included:

- cost of investing in EV
- limitations in the range of vehicles available,
- the distances that they can complete on a single charge,
- lack of availability of second hand EVs
- long wait times for new EVs
- charging infrastructure still limited
- concerns about battery life
- financial struggles due to cost-of-living crisis and inflation.

The trade representatives did however support an interim policy based on Euro 6 emissions and suggested retaining the age policy for new applications. This would ensure the condition of vehicles is good on first licensing and that vehicles are Euro 6 compliant. An exemption from the age policy could be made for ULEVs to encourage take up of vehicles with no or very low emissions. Removing the 10-year age limit on renewal and replacing it with a Euro 6 criteria would result in the removing the older higher polluting vehicles. It would also mean that in due course vehicles can stay licensed for longer so giving the trade confidence to invest more on first licensing or when a vehicle needs changing.

5.8 **Informal Consultation with all licence holders** – At the beginning of October 2022 an email was sent to all taxi and private hire licence holders for their views on a draft interim emissions policy based on 5 year or less age criteria for new vehicles and a Euro 6 criteria for renewal. The policy proposed that the current exemption for elite vehicles be removed but the exemption for WAVs and EVs to remain. There were 6 responses and generally there was support for the proposal. There were some comments that the criteria would not encourage new applicants and points were raised about ways to support the trade. There were also several comments about it not being fair that WAVs or EVs are exempted from any policy and it should be a level playing field. A schedule of responses is Appendix A.

- 5.9 **Interim Euro 6 policy** - As an interim measure, an emission policy based on age and Euro 6 compliance would ensure that older, higher polluting vehicles are phased out over the next few years whilst still maintaining a good standard of vehicle condition. Care needs to be taken that a policy based on Euro 6 compliance does not result in the long term with an ageing fleet of licensed vehicles and there should be a review to ensure that standards and quality of vehicles is maintained.
- 5.10 **Grandfather rights** - Consideration should be given to the fact that many of the current licence holders will have invested in a vehicle based on the current age policy. It is recommended that any proposed change should have a 'grandfather rights' time period built in for existing licence holders as a period of grace. This will give them time to replace their current vehicles in line with a new policy and reduce any unexpected financial impact. A policy that gives grandfather rights to existing non Euro 6 vehicles up until 2025 would cause the least hardship as those vehicles would have reached the end of their licensed life under the current age policy any way.
- 5.11 **Elite Vehicles** - Elite vehicles are exempt from the current age policy. This exemption was originally introduced because they can be higher investment vehicles. However, the older models usually have big diesel engines with higher emissions. The exemption is often used by the trade to buy a cheaper vehicle as older elite vehicles can cost less to buy than a vehicle which is less than 5 years old. It is felt that the exemption should no longer continue and that existing elite vehicles which are not Euro 6 compliant are phased out.
- 5.12 **Wheelchair Accessible Vehicles** – Careful consideration should be given to wheelchair accessible vehicles (WAVs). The Council has only 11 licensed WAVs and only three of these are Euro 6 compliant. Concern was raised by the trade that it would be unfair to exempt WAVs from any age and Euro 6 rules applying to other vehicles. There was also concern that if WAVs are exempt the trade may opt to buy an older higher polluting WAV as a cheaper option than a vehicle that is less than 5 years old. The group was mindful of equality issues and the fact that the Council in the past has not been able to encourage the trade to invest in WAVs. Not allowing an exemption for WAVs could result in a further reduction in the number of WAVs available for wheelchair users including for home to school contracts through Gloucestershire County Council. The group considered this carefully and concluded that emissions could be balanced with equality by exempting new applications for a WAV from the 5-year age policy but instead require that new WAV applications must be Euro 6 or above. This would give the trade wanting to invest in a WAV more flexibility in choosing a suitable vehicle but still remove the higher polluting WAVs.
- 5.13 **Long term aims** - The ambition for Stroud District Council is ultimately for all taxi and private hire vehicles to be EV with zero emissions. Laying out a Council's long-term aims and potential timescales will give the trade opportunity to make choices as to the most appropriate vehicles to buy and will encourage them to begin investing in EVs as we move towards 2030. An interim policy based on age and emissions will enable the district to move in the right direction towards reducing emissions. This can then be reviewed in 5 years' time taking account of the situation, including the Government's direction in relation to EVs. At that time consideration will also need to be made whether the plug in hybrids

that have very low emissions will be continue to be permitted or whether only EVs with zero emissions are to be permitted.

6 POLICY RECOMMENDED BY THE TASK AND FINISH GROUP FOR CONSULTATION

- 6.1 Below is the Task and Finish Groups proposed policy, with time scales. The Group recommend that the Committee approve the policy for formal consultation. At the end of the consultation period the group will review all comments before bringing back a final proposal to Committee for adoption.

1st April 2023	New vehicles and change of vehicle applications (except WAVs and ULEVs) WAV new vehicle and change of vehicle applications <ul style="list-style-type: none"> The current exemption for new applications for elite vehicles will end ULEVs will continue to be exempt Renewal applications will continue under 10 year age policy 	Vehicle must be 5 years old or less Vehicle must be Euro 6 compliant or ULEV
1st April 2025	Renewal vehicle applications <ul style="list-style-type: none"> The current exemption for renewal applications for Elite vehicles will end It will take 12 months from 1st April 2025 until all vehicles become due for renewal and have to comply 	Vehicle must be Euro 6 or ULEV
1st April 2028	Review of Interim policy and consider whether a move to ULEV (or EV only) is appropriate	
1st April 2030 (Provisional)	New and change of vehicle applications	Ambition that they must be ULEV
1st April 2023 (Provisional)	Renewal vehicle applications	Ambition that they must be ULEV

- 6.2 If Committee approve the above proposal the timetable for consultation and adoption will be as follows

- 7th December 2022 to 12th February 2023 - public consultation
- Mid-February – Task and Finish Group meeting to consider consultation results
- 23rd March 2023 - Community Services and Licensing Committee to adopt a final policy
- 1st April 2023 - Implementation of new policy.

6.3 The consultation will include

- Taxi and private hire licence holders
- Ward Councillors
- Town and Parish Councils
- Ward Councillors
- Community Safety Partnership
- Equality, Diversity and Inclusion Working Group
- Health and Wellbeing
- Gloucestershire County Council Integrated Transport Unit
- Police
- Bodies representing taxi users including Gloucestershire Sight Loss Council, Allsorts, CAB, Youth Council, Community Hubs
- Gloucestershire Licensing Officers Group
- Web notice.

7. CONCLUSION

- 7.1 There is an ambition that ultimately all taxi and private hire vehicles will be EV in line with the Councils Carbon Neutral 2030 target. However, the conclusion of the Task and Finish Group is that at the current time there is not the availability of suitable EV vehicles that would be affordable for the trade. Additionally, the charging infrastructure is not in place yet.
- 7.2 The Task and Finish Group are recommending that an interim policy based on age and Euro 6 compliance is approved by Committee for formal consultation. This proposed policy will ensure that older, higher polluting taxi and private hire vehicles are phased out whilst still giving the trade time and scope to invest in euro 6 compliant vehicles or ULEVs.

8 IMPLICATIONS

8.1 Financial Implications

There are no direct financial implications related to this report.

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8.2 Legal Implications

The Council will need to carefully and thoroughly assess the impact of introducing the proposed policy, including the effect on the supply of taxis and PHVs in the area. They should also bear in mind the need for a proportionate approach, ensuring that those licence holders that would not meet the criteria have the opportunity to adapt or change their vehicle within a reasonable time.

Consultation on the interim policy should include not only the taxi and private hire vehicle trades, but also groups likely to be the trades' customers.

Further legal implications will be provided once the Task and Finish Group bring back a final proposal to Committee for adoption.

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8.3 Equality Implications

An EIA has been carried out by Officers in relation to the decision made in this report and due regard will be given to any implications identified in it. This is Appendix B.

8.4 Environmental Implications

The Government's website reports that cars and vans represent 19% of all domestic emissions. In Stroud District there are 145 licensed taxi and private hire vehicles, so they are only a small percent of the total number of vehicles within the district. However, any reduction in emissions from taxis and private hire vehicles will be a move to improving air quality and help reduce impact on the environment. An all-electric fleet with zero emission is the ultimate aim but this has to be balanced against cost and impact on the trade. The policy proposed in this report seeks to improve emissions by introducing an interim policy which will result in all taxis and private hire vehicles being Euro 6 emissions or ULEV by 2025 and will see a phasing out of older, higher polluting vehicles up to that date.