

# Appendix A - Report on Vehicle Emissions Policy for Taxi and Private Hire Vehicles for adoption

## Stroud District Council

### Results of Consultation on Proposed Taxi and Private Hire Vehicle Emissions Policy

Consultation Period 7th December 2022 to 12th February 2023

Stroud District Council's taxi and private hire vehicle policy is under review with an aim of reducing the number of higher polluting taxi and private hire vehicles. The Council's ambition is that in the long term all licensed vehicles will have zero emissions in line with the Council's Carbon Neutral 2030 objective.

The consultation is on a proposed interim vehicle policy that sets out to move away from the current policy based purely on age and to replace it with a policy based on age for first licensing and Euro 6 emissions compliance to remain licensed.

The taxi and private hire trade have already been consulted with informally earlier in the year

Exemptions are proposed for Ultra Low Emission Vehicles to encourage trade investment in zero and very low emission vehicles.

An exemption from the age policy on first licensing is also proposed for wheelchair accessible vehicles to encourage trade investment in wheelchair accessible vehicles.

#### Breakdown of Respondee

2	Taxi/Private Hire Licence Holder	8
	Ward Councillor	2
	Town or Parish Council	4
	Member of Public/Other	18
	<b>Total</b>	<b>32</b>

Page 2 of this document are the headline yes/no results.  
The remaining pages are the full results with all comments.

## PROPOSED CRITERIA FOR VEHICLES ON FIRST LICENSING

Do you agree, that when a vehicle is first licensed as a taxi or private hire vehicle, it should be no more than 5 years old?

Q4

Yes	16	52%
No	15	48%

Do you agree that wheelchair accessible vehicles should be exempt from a 5 year age policy on first licensing but instead must be Euro 6 compliant or a ultra low emission vehicle?

Q5

Yes	20	67%
No	10	33%

Do you agree that the current exemption for elite vehicles from the 5 year age policy on first licensing should end?

Q6

Yes	13	45%
No	16	55%

## PROPOSED CRITERIA FOR VEHICLES ON RENEWALS

Do you agree with the proposal that a vehicle licence cannot be renewed if a vehicle is not Euro 6 compliant or an ultra low emission vehicle?

Q7

Yes	19	61%
No	12	39%

Do you agree that the current exemption on renewal criteria for elite vehicles should end?

Q8

Yes	16	52%
No	15	48%

Do you agree that on renewal, existing wheelchair accessible vehicles should be exempt from a Euro 6 policy?

Q9

Yes	19	61%
No	12	39%

Do you agree that there should be period of two years to allow existing vehicle licence holders to comply with a new Euro 6 compliance or ultra low emission vehicle proposal on renewal?

Q10

Yes	19	63%
No	11	37%

## AMBITION FOR ZERO EMISSIONS

Do you agree that the proposed policy, if adopted, should be reviewed in 2028 to consider an ambition that from 2030 new vehicle applications will be for ultra low emission vehicles only and that from 2033 renewals will only be permitted for ultra low emission vehicles only

Q11

Yes	17	55%
No	14	45%

ULEVs are currently defined as having less than 75 grams of CO2 per kilometre (g/km) from the tail pipe.

EVs are pure electric vehicles with zero emissions

Source - <https://www.vehicle-certification-agency.gov.uk/fuel-consumption-co2/fuel-consumption-guide/zero-and-ultra-low-emission-vehicles-ulevs/>

# PROPOSED CRITERIA FOR VEHICLES ON FIRST LICENSING

**Q4. Do you agree, that when a vehicle is first licensed as a taxi or private hire vehicle (including a change of vehicle), it should be no more than 5 years old? This is no change from the the Council's current policy**

Yes	16	52%
No	15	48%
If a car is ulez compliant from 2015 it should be allowed to be licensed, it would save me a lot of money on having a lower registration car- i.e. Euro 4 for petrol cars and Euro 6 for diesel cars		
I think a car needs to be a good standard. However, you can get a lot of nice cars up to 8 years old at a reasonable price, and with good emissions(ulez euro 6 came in 2015). Due to the state of the roads		
Car prices are too expensive		
There are vehicles that are over 5 years old that have very low mileage and are in better condition than a 4 year old car. So what is the difference as long as the older car meets the Euro6.		
The cost of vehicles under 5years old makes it quite restricted. With a newer vehicle, come added costs of higher insurance etc. It will certainly put "more luxurious " vehicles out of reach/too expensive to register at 5 years old.		
It must be difficult for small businesses with the increasing costs of fuel and cost of living crisis.		
Whilst I support this I overall, Taxi drivers often have low incomes, or this is a second job. If you specify this you may well price some people out of being able to make a living.		
Placing a restriction on the age of the vehicle is not a sustainable policy both in terms of economic and environmental sustainability although there should be an aim to introduce higher standards of vehicles including ULEV/ Euro compliant. Generally though, the key policy issue for the Council to address is not the age of the vehicle but the safety and upkeep of the vehicle, this can be addressed, for instance by a planned programme of vehicle inspections for roadworthiness and vehicle condition including, for example, undertaking inspections independently at the Council's depot managed by UbiCo, rather than rely on private garages to undertake inspections. Additionally, the Council's existing teams (eg neighbourhood wardens and Civil Enforcement Officers) roles could be extended to include monitoring of the taxi trade including undertaking test journeys.		
Cn2030 is about reducing co2. Most co2 is created in manufacturing the car not using it. The best, most economical and co2 efficient is to use a car until it is no longer viable to maintain. Renewing a car just because it reaches a certain age artificially increases co2.		

**Q5. Do you agree that wheelchair accessible vehicles should be exempt from a 5 year age policy on first licensing (including a change of vehicle) but instead must be Euro 6 compliant or an ultra low emission vehicle?**

Yes	20	67%
No	10	33%

However, I believe the 5 year age exemption should be reviewed in 2026 to ascertain whether there has been sufficient trade investment in these vehicles and, if so, whether they are primarily older vehicles. If neither, then bring them into line with others.
Have any of you looked at the prices of these vehicles
Relaxing the rules for WAV's would hopefully give drivers more of an initiative to invest in these vehicles.
As above, if you price taxi drivers out of making a living, it defeats the object.
As part of this review the Council needs to consider what aspects of policy promotion are legitimate to pursue. For instance the current published registration fees are £422 for three years (£160 first registration and £131 subsequently) and it might be appropriate to reduce this for wheelchair accessible vehicles to say £50 per year for ULEV vehicles. Equally, fees for non wheelchair vehicles which do not meet ULEV/ Euro 6 compliance could have their fees increased by an escalator of 10% per annum.
the cost is a major factor
I think we need to take a more balanced view and address why there are so few accessible taxi options available in our District. The unintended consequences of focusing solely on 2030 targets is to further impact some of those in our community who need the most help. What is SDC doing to encourage Accessible vehicles? What support are they giving to ensure there is a service available to those who need it in the District? What study has SDC carried out in relation to the level of accessible taxi provision weighted against need? In my discussions with some of the taxi drivers, they note the number that have left the business and how they feel SDC is not supportive and simply seeks to use them as a revenue stream. I don't necessarily see this as being the case, but I do think SDC will benefit from making more of the positive work they do to support and enable this valuable and vital resource within this rural
I do not agree with the existing 5 year age policy on first licensing (including a change of vehicle) whether for wheelchair accessible ones or any other dndvi do not agree they must be Euro 6 compliant or an ultra low emission vehicle.
If its going to be compliant for ALL vehicles, then it should be ALL vehicles!!
I do not agree with change any licensing policy relating to taxis for emissions.
No, I disagree with the 5 year policy exemption and the policy. I do not agree that there should be a time limit or new requirements.

**Q6. Do you agree that the current exemption for elite vehicles from the 5 year age policy on first licensing (including a change of vehicle) should end**

<b>Yes</b>	<b>13</b>	<b>45%</b>
<b>No</b>	<b>16</b>	<b>55%</b>
It makes no sense that any vehicle be exempt when we are wholly concerned emissions.		
Why should it be any different to a normal taxi, it's a car the same as the rest		
Who decides what an elite vehicle is? A Volkswagen can cost the same as a bmw these days...		
I feel this should end. If the vehicle is Euro6 like everyone else that's fine. A vehicle could be deemed elite by one person but not another.		

What difference does it make what make or model of car is involved? It is absolutely ridiculous. I thought this was about co2 not envy and jealousy.

This policy doesn't seem balanced and simply singling out a manufacturer does not sent a clear message. I believe this should be revisited to make it clearer what the intention of the special allowances for two German manufacturers may be, then look to ensure the protected vehicles remain protected whilst ensuring it's the overall vehicle attributes (rather than a blanket manufacturer allowance) that is the focus.

Some of these venicie have an extra long life expectancy and offer a service that is need by some people. Therefore a vehicle of this calibre can be very serviceable for many more years than others. The owners should not be penalise. When combustion vehicles can no longer be made in 2030, there is no requirement on the books that all others should be scrapped, they will go through their expected lives, owners cannot automatically be expected to expend thousands of pounds to replace perfectly serviceable vehicle, that have to pass an MOT test as it happens anyway, that includes emissions

Are the council going to give Taxi Drivers and companies grant to help pay for the new vehicles

as long as they are well maintained

It will take most of these cars off the road. I am specifically used as a private hire vehicle on some occasions because I have an "elite" vehicle. My clients like the comfort, the "badge" and prestige of the vehicle. I could not afford to buy and register this type of vehicle 5 years old or under!

You just end up scrapping perfectly good vehicles. Has the environmental impact of scrapping a vehicle and making a new one been taken into account?

Placing a restriction on the age of the vehicle is not a sustainable policy both in terms of economic and environmental sustainability although there should be an aim to introduce higher standards of vehicles including ULEV/ Euro compliant. Generally though, the key policy issue for the Council to address is not the age of the vehicle but the safety and upkeep of the vehicle, this can be addressed, for instance by a planned programme of vehicle inspections for roadworthiness and vehicle condition including, for example, undertaking inspections independently at the Council's depot manged by UbiCo rather than relying on private garages to undertake inspections.

No I do not. However, I do not agree with the existing 5 year age policy on first licensing (including a change of vehicle) for any type of manufacturer of vehicles.

I do not agree with change any licensing policy relating to taxis for emissions.

# Vehicle Criteria on Renewal

**Q7 Do you agree with the proposal that a vehicle licence cannot be renewed if a vehicle is not Euro 6 compliant or an ultra low emission vehicle? The current policy is that vehicle licences cannot be renewed once a vehicle is over 10 years old. Vehicles manufactured after September 2015 are Euro 6 compliant for emissions. 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**

Yes	19	61%
No	12	39%
But only based on the proposed grace period to 1 April 2025.		
This is critical. It makes no sense that we continue to allow high emission vehicles to renew.		
I think as long as it's euro 6 compliant, why does there need to be an age limit? As long as the car still meets certain standards.		
Polluting vehicles should be phased out by 2025 All the new clean air zones in the country are all targeted towards Euro6 compliant vehicles so maybe use this as guidance on licensing new vehicles.		
Without support, what is the risk assessment on the further loss of Taxi availability within the District? How is SDC planning on addressing any further loss, or providing a service to the public themselves (or through a chosen set of contractors) should the level of service drop further? What analysis and research is there on the number of vehicles within the available fleet this will impact? I suggest that, in order to ensure SDC do not bring about an exodus of taxi drivers, this impact and risk management is essential. Who benefits from there being less taxis on the road to serve those in our communities who rely upon them and those who visit our District? Are you aware that, for example, hotels and venues are often struggling to arrange transport for their customers? Are you also aware that a lack of transport options is impacting our local economy as people can't access the transport they need to attend events and gatherings? Not everyone has the benefit of being able to walk and cycle everywhere they need to access and there is often a need to travel distances across the District.		
My view is that on renewal the criteria should be the same as ULEZ standards i.e Euro 4 for petrol cars, vans and minibuses and Euro 6 for diesel cars, vans and minibuses		
The choice of vehicle (as we are all self employed) should be down to Driver choice. This is generally taking into account our clients preference. If the client isn't happy with the vehicle or the driver, then they don't return for repeat business. There are enough added taxes to cities for higher emission vehicles, which I explain to clients at time of booking, and EVERYONE is willing to pay the extra taxes to use me and my vehicle for their journey.		
Are you going to install electric charging points at taxi stands?		
Will there be incentives, or financial help, or loans? If it means people can't make a living it won't help, much as I agree with the idea of it.		
I agree with the 10 year policy & it should not change.		
Less co2 is emitted by saving on the manufacture of a new vehicle. Keep the existing stock going as long as possible.		
I do not agree with proposed changes to licensing policy relating to taxis for emissions.		

**Q8. Do you agree that the current exemption on renewal criteria for elite vehicles should end? Elite vehicles are luxury vehicles such as certain models of Mercedes and BMW**

<b>Yes</b>	<b>16</b>	<b>52%</b>
<b>No</b>	<b>15</b>	<b>48%</b>

But only based on the proposed grace period to 1 April 2025.

Please see earlier comments on (6) relating to reviewing to not single out two manufacturers and focus more on the aim of the policy and how this can be more balanced in its application.

No.. As explained before, these vehicles are of a higher spec and therefore have a higher price tag. It costs more to replace that takes a longer period of time to save up for. I, and other drivers I speak to with this type of vehicle, all take pride in their vehicle and keep it clean, tidy and serviced regularly. A lot of these vehicles are the pride and joy of the driver and some look better and better maintained than some of the newer vehicles being used!

No I do not agree to having a time limit or new requirements

I do not agree with the proposed changes to licensing policy relating for taxis for emissions.

**Q9. Do you agree that on renewal, existing wheelchair accessible vehicles should be exempt from a Euro 6 policy? Vehicles manufactured after September 2015 are Euro 6 compliant for emissions.**

<b>Yes</b>	<b>19</b>	<b>61%</b>
<b>No</b>	<b>12</b>	<b>39%</b>

To promote improved equality for passengers the Council should be actively encouraging the provision of more wheelchair accessible taxis and should have a clearly stated policy ambition that the whole fleet is wheelchair accessible by a specified date in the future. 2035 appears reasonable to

We need to ensure we have sufficient accessible vehicles available within the District. It seems contrary to the public interest to make moves to reduce something that is already at a very low point - it would be better for SDC to make the public and business more aware of how they are supporting taxi businesses to increase the number of accessible vehicles - so moving us further away from an ableist society.

But I do not agree with change any licensing policy relating to taxis for emissions.

Yes as I think they should not be Euro 6 compliant.

I agree this should be the policy for all vehicles not just wheelchair accessible ones.

But allow the proposed grace period to 1 April 2025.  
With the goal of reducing emissions it does make sense that these should also be Euro 6. However due to the additional investment required in such vehicles a longer period should be allowed for Euro 6 compliance.

Not sure why these vehicles should be exempt if others aren't! If its down to cost, or limited availability, then the same will apply to the elite vehicles.

No I disagree with any time limit or new requirements

**Q10. Do you agree that there should be period of two years to allow existing vehicle licence holders to comply with a new Euro 6 compliance or ultra low emission vehicle proposal on renewal? This would mean that existing taxi and private hire vehicles that are not Euro 6 compliant, or an ultra low emissions vehicle, or a wheelchair accessible vehicle, will be able to remain licensed until 1st April 2025. After this date renewals of non compliant vehicles will not be permitted.**

<b>Yes</b>	<b>19</b>	<b>63%</b>
<b>No</b>	<b>11</b>	<b>37%</b>

Yes, as this will allow time for the impact to be better understood and allow SDC time to get in place any remedial plans that will plug the gap between need and available taxi provision. SDC should also be open to extending this further should they find that they cannot provide an alternative provision within the 2 year timescale they set - it may take some time to either source funding or find contractors that will provide a taxi service to replace those who feel forced out of the business.

A two year notice period would help.

This is too short a period

2 years isn't enough time. The electric vehicles do not have the range or quick enough charge (or charging stations) for these vehicles to be used by regular private hire drivers who can often cover 500-600 miles a day if running to Heathrow/London 3 times a day - happens more often than you'd think, and certainly without enough time to charge between runs!

No I do not agree. There should not be any time limits imposed or new requirements for vehicles.

No. I do not fundamentally agree with the policy to restrict taxi business to align with idealist views of this council. The policy should be based on evidence that it would reduce emissions. Producing news cats based on flawed ideas of being more environmentally friendly does not support the Stroud area. If the council is concerns about emissions in specific areas in Stroud (based on air quality testing) then it would be more appropriate to look at restricting any vehicles.

This proposed policy should not be implemented therefore no need for this exemption.

I do not agree with change any licensing policy relating to taxis for emissions.

As I think they should not be Euro 6 compliant.

Keep the policy the same



# Ambition for Zero Emissions

**Q11. Do you agree that the proposed policy, if adopted, should be reviewed in 2028 to consider an ambition that from 2030 new vehicle applications (including change of vehicle) will be for ultra low emission vehicles only and that from 2023 renewals will only be permitted for ultra low emission vehicles only? 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**

<b>Yes</b>	<b>17</b>	<b>55%</b>
<b>No</b>	<b>14</b>	<b>45%</b>
I don't think anybody can predict what will happen over the next 5 years so this would be fair.		
The policy should be clearly established NOW, with provision for a further review if specific events have not been achieved within national policy (eg delay in ULEV implementation.		
Only if you help and support people to do this. Otherwise it's all stick and no carrot		
if not sooner, to give applicants as much notice as possible of any changes		
2023 IS MUCH TOO SOON FOR RENEWALS AND THE SECOND PART OF THIS QUESTION APPEARS TO BE INCORRECT.		
Without the details of the risk assessments and evaluations that SDC are carrying out to better model the impacts of their choices, it's impossible to agree to this policy, I suggest. Should SDC find a way that rather than further reducing taxi availability, it bolsters it and rejuvenates this vital service to those in our towns and surrounds, then this policy review may be a good idea.		
There just isn't the range, chargers, incentives to go Electric. Hybrids could work, but why is a 4 litre vehicle any cleaner just because it can do 20miles on electric when it's switched over from petrol. I'm not sure how any of these changes are going to help or enhance my clients use of my service. If I'm asked at booking what vehicle I drive, I have NEVER had a booking refused because of the vehicle I'm using - in fact, quite the opposite, after "ooo, sounds lovely and prestige and would make our occasion seem extra special to arrive in style!"		
I do not agree the policy should be adopted.		
No. Keep existing stock going as long as possible. No need for a review. No need for a new policy.		
No as I think they should not be Euro 6 compliant.		
I do not agree with any change to licensing policy relating to taxis for emissions.		

**Q12 Any Other Comments**

These proposals seem fair at the moment. I think the scrapping of the age restriction is a good idea and should have been done previously.
This rural area should be a later adopter of green policy than urban ones to allow cheaper public transport. Otherwise we will rely more on private vehicles

Overall, I support these aims, but I know how hard the cost of green crisis is for some people. I only agree if you find ways to help and support people to do this.

Whilst SDC may find itself in funding difficulties, it's important to note we are currently in a Economic Emergency and Local Economy Crisis. The timing of extra restrictions and costs could not have been timed poorer, I would suggest. My consultations with Taxi Drivers made me acutely aware and informed about their challenges, the reasons why so many have left the industry, and the tight margins involved whilst circumstances conspire against them. If tariffs are raised, this will impact the existing cost of living challenges being felt by our communities; if they are not, where will the money come from to support this initiative? What supporting financing arrangements are planned? If those were included in this proposal, it would help me to have been able to give you the responses you wanted, rather than the ones that (in all conscience) I could give. Is SDC planning to lead the way in a new format of taxi provision for rural areas? Something that positively supports the industry to purchase and use the vehicles that it deems best for the council and its own environmental goals? This would be great news, ensuring that it is economically viable for the drivers and operators, avoids further reducing a service that is struggling and essential in our rural setting with an ageing population, whilst saving the planet and meeting the targets it has set itself.

Stroud Town Council considered the consultation recently and supported the ambition for Euro 6 and ULEZ vehicles, but it was clear there is very little support for existing drivers and to attract new drivers into a rather sparse environment. With an ageing population, remote areas, few taxis available in the evening to take people home and a failing bus service, there is a need for more taxi drivers working here and to understand and enable them to perform their jobs before this is implemented. Taxi drivers are vital to the mix of vehicles in Stroud.

Electric Vehicles have not got the range (mileage between charges ) and this country will not have the infrastructure by 2030, You go to any garage and there is people waiting for electric charging points

I think the Councils proposal is going to put a lot of taxi drivers out of Business

My biggest concern is this is a "tick box" exercise. Until a much greater distance can be achieved, more chargers are available, charging can be done in 30mins, then unfortunately changing to Electric is impractical and too restrictive and could easily end with loss of potential earnings. No client has ever asked me if I would change to Electric to become green. As most clients are travelling by car or plane, then I can't believe again, that they would worry too much about emissions. We are charged for emissions on road tax, City charging and parking, and yet none of these have put off my clients. My vehicle is always serviced and cleaned regularly and kept in good/excellent condition. It's Council MOT twice a year which it passes regularly. The public will find that there is very limited choice in elite vehicles for those "special/specific runs" and so will encourage for "Joe public" to volunteer their car for the occasion even though it may well not be insured or driver checked. I personally don't have an issue using or getting in a car whatever the age or emissions, as long as its road worthy, clean and in general good condition- like what most of the public drive!

I disagree with the changes proposed by the council. This is a rural district and you are penalising those who need to use taxis and will lead to taxi owners going out of business. The proposal for "clean" vehicles is simply not true. Electric cars are significantly more polluting (total lifecycle) than other forms of fuelled vehicles. It's virtue signalling!

Question 3 shows clear evidence of a sham consultation with it being targeted at the taxi trade, District councils and parish councils and anyone else treated as "other". The Council needs to actively encourage all sections of the community to participate in consultation exercises and specific consideration should have been given to how this survey can be targeted at wider range of people including green groups, transport groups and public transport users.

I would like to see the evidence of why this is being progressed. Concerned Coaley resident

I do not agree with proposed changes to licensing policy relating to taxis for emissions.

Please do not change the licensing process as this will lead to taxi business owners going bust as it will no longer be viable. There are other ways to reduce emissions for example solar panels on commercial property roofs not using agricultural land.

Whilst this is a useful thing to do, taxis make up a very small percentage of road vehicles in Stroud. How about putting some effort in to supporting walking and cycling, EV chargers and supporting public transport too?