

TOA TAXIS RADIO SYSTEMS LTD

OBJECTION/COUNTER PROPOSAL TO THE EMISSIONS DRAFT POLICY 15TH FEBRUARY 2017

On 15th February 2017 Head of licencing Mr Chris Neville presented a proposed draft document for the committee to adopt a CAZ policy with 4 weeks consultation.

We would like to emphasise why we believe that the introduction of any reduction in the age limit on taxis is the wrong approach in both ensuring Birmingham's air quality meets E.U standards and ensuring a viable and sustainable taxi service to the city of Birmingham.

It is clear that the only reason that Birmingham are considering a reduction to the taxi fleet is a belief that it will enable them to meet their air quality targets by the year 2020. We believe it is a wrong assumption.

A reduced fleet will have a detrimental effect on residual values, which is acknowledged by everybody. It will not cause any uplift in the sales of new cleaner/electric taxis as it will not address the major barrier to sales which will be increased upfront purchase costs over that of an existing diesel model.

Owners of all vehicles will suffer an immediate loss of value of their assets the moment any reduction in the fleet is announced. This means that whatever the agreed loss to the fleet is, it will be owed and should be paid on day one to the affected. In effect a fleet limit strategy punishes drivers immediately, and from what we can gather, without any plans to compensate.

The only sensible, practical and logistically possible route is to retain the current fleet with the aid of a retrofit solution to achieve the reduction in emissions. There will no immediate loss of current residuals and no complicated calculations to assess each individual claim of loss. The drivers can have confidence in knowing and planning around a stable market. When cleaner vehicles are introduced in the future drivers will be able to plan knowing their existing residual values have not changed from the business plans they made when they invested in their current vehicle.

The DEFRA document titled "UK plan for tackling roadside Nitrogen Dioxide concentrations" (an overview) page 9 paragraph.22 reads: *Government will assess local plans to ensure they are effective, fair, good value and deliver the necessary air quality compliance.*

The current draft policy is neither fair nor good value, it won't necessarily achieve the emission goals/targets set.

GOVERNMENT DIRECTIVE

Birmingham licencing Committee has argued that it has been asked to prepare a draft policy so that by year 2020 Birmingham City has to have zero emission. **What the Government did not say was**

that Birmingham City Council to force Black cabs off the road from December 2017. This policy was the brainchild of the Licencing department. The only mandate Birmingham City Council and licensing department have over this is to provide facts/ information and prepare the trade for transition in 2020. To proceed with in this “text” the proposed policy would have a devastating effect on the Hackney Carriage trade.

Trade reps are of the opinion that Birmingham City Council left it very late to bring this to the trade’s attention. This should have been discussed years before and not just to spring it on the trade with full might and expect the trade to embrace it at drop of a hat.

This is totally unacceptable and the trade rejects Birmingham licensing’s proposed policy.

Toa’s opinion of the Draft proposed policy

The February draft document is full of gaps. It is a clear indication that no consideration was given on how this will affect the Hackney Carriage trade and how it will have a devastating effect on the drivers’ livelihoods.

There was no meaningful dialogue between the licencing department and the trade reps. At the bi-monthly liaison meetings very little time was given to this topic. At no stage this proposed draft policy was discussed at the trade meetings or was even given slightest hint that this was in the pipe line.

All the discussions that took place were around “how conversions will take place and how many vehicles were to be converted” The funding was only for 63 vehicles out of 1200 plus licensed vehicles. There is only one garage in Birmingham who are authorised to carry out these conversions. These 63 cab conversion took 2 years.

When questions were raised as “what about rest of the vehicles” the answer was we don’t know, we will have to “BID” for more funding but we don’t know if we will be successful.

Mr Neville stated at one meeting that “we will seek more funding for TX1, Tx2 and TX4 vehicles. He further stated that there was no solution as yet for EURO cab vehicles this is because we have yet to identify a suitable engine that can be installed and converted to LPG.

A week before 14th of February the trade was sent this bombshell which sent shock waves across the trade.

There is no one in the trade that says no to cleaner air to breath. The drivers themselves are victims to this pollution and not to mention their families.

The trade is in agreement with this council that they have to tackle this problem. But there must be a procedures/assistance put in place to achieve this target.

Toa’s Proposal

- 1. No vehicle should be taken off the road until year 2020 as long as the vehicle meets an “exceptional test” with the aid of a retrofit solution to reduce emissions.**
- 2. All LPG converted vehicles must have extensions until year 2026. To take them off in year 2021 would be deemed to have been wasted £500,000 tax payer’s money.**
- 3. Meaningful discussions at length with the trade.**
- 4. Provide fully documented evidence of effected CAZ hotspots through surveys conducted.**

5. Surveys to be done to ascertain what percentage of pollution the taxis are contributing to this pollution.
6. We should discourage congregation of vehicles in the CAZ hotspots by providing more rank spaces.
7. Not to remove any taxis until there are affordable replacement vehicles.
8. More funds/grants need to be made available to the taxi trade to transit over to newer cleaner vehicles.
9. Steps need to be put into place to safe guard the Hackney Trade if the drivers were to invest in new expensive vehicles. I.e. enforcement, rank spaces and out of town vehicles operating in Birmingham should be stopped.
10. Not to remove any vehicles until 2020 as the DEFRA document titled "UK plan for tackling roadside Nitrogen Dioxide concentrations" shows on page 7 a pie chart (figure 3) which shows that taxis only contribute to 2% of the pollution. Therefore removing taxis will probably not reduce the pollution problem in it's entirely but by removing the taxis it will cause the consumer and supplier a lot of problems.
11. Birmingham should carry out their own environment pollution study as the onus has been put on local authorities by Defra to make plans to combat pollution. The DEFRA document titled "UK plan for tackling roadside Nitrogen Dioxide concentrations" (an overview) page 7, paragraph 16 states *"given the local nature of the problem, local action is needed to achieve improvements in air quality. As the UK improves air quality nationally, air quality hotspots are going to become even more localised and the importance of action at a local level will increase. Local knowledge is vital to finding solutions for air quality problems that are suited to local areas and the communities and businesses affected. A leading role for local authorities is therefore essential."*

IMPACT

The impact on the disabled users has not even been taken into consideration in the February report. At TOA taxis we carry out 50,000 wheelchair journeys per year. This does not include the unaccountable wheelchair journeys that NON-TOA drivers carry out. By reducing the number of cabs proposed over the next two years will leave the disabled community without a viable form of transport. As will other members of the public who rely daily on our service. The hackney drivers are usually the first point of contact when foreign dignitaries arrive in Birmingham and are the ambassadors of Birmingham. The taxi trade provides a 24 hour public service where no other transport does. The Taxi trade also contributes a great deal towards Birmingham's economy and much more. All which under these proposals will be lost by the end of 2018.

These proposed changes will also have a detrimental effect on drivers and their families. Taxi drivers in Birmingham are mainly from ethnic back ground. It is a very complicated back ground where families are interconnected with communities which can be huge burden to most of the families. Many drivers have to support family members beyond their own families such as parents, grandparents or uncles/aunties. This is imbedded in Asian culture and has been practise by generation after generation.

No financial impact report has been done on the drivers. Will the drivers have enough funds to buy a new cab? If they need finance will they be able to get finance due to their age or their credit ratings? Some drivers have already got finance on a vehicle that they recently purchased. To some drivers this will mean taking out another mortgage.

How many drivers will be made to go on the dole? Adding to unemployment?

Highlighted are extracts from proposed policy in February 2017

5.1 “Work has already begun in Birmingham to address emissions from hackney carriages and private hire vehicles. We have been successful in obtaining £0.5m from the Department for Transport’s Clean Vehicle Technology Fund to pay for conversion of 63 hackney carriages to run on LPG. The funding has paid for a solution that involves new Vauxhall engines that are converted to run on LPG being put into hackney carriages. LPG has zero NO2 emissions”

In year 2021 these vehicles will be taken off the road. This is a clear indication that this proposed policy was not thought out properly and other consciences were not taken into consideration. Our goal has to be a long term solution to this problem. Other affordable solutions are available as “retrofits” to achieve our goals.

The buses have received over £30 million in bursaries but the taxi trade “nil”.

In the licencing’s draft proposal in paragraph 3.5 it reads as follows

“ To inform this process (DEFRA) and DFT undertook a consultation with local authorities to build up an understanding of COMMITTED INTERVENTIONS which would address air quality together with an understanding of other potential interventions which were planned or might be required to reach compliance. This included a discussion around what additional support might be needed from Government to enable these changes to happen”

So the question arises.

1. What type of support was asked for, from the Government?
2. Has the Government and licencing department provided affordable alternative replacement vehicles available to drivers to purchase?
3. Has the Government provided any finance incentives in form of grants?

- 3.6 Refers to EU could be levied against UK Government to the amount of £300 million. This is a false statement when we are no longer in the EU.
- 3.7 Under the Environment Act 1995. Has Birmingham complied with the emission obligation? Has Birmingham been fined under Act 1995
- 3.8 Refers to Birmingham being fined if “not fully comply with limit value” In paragraph 3.5 refers to “what additional support from Government” This is translated as far as the trade is concerned is “how can Government fine you when it is offering additional support” The only logical possibility of being fined would be if the additional support was not used towards to achieve this goal.

4. FLAWS IN BIRMINGHAM LICENSING PROPOSAL

- 4.1 CAZs haven’t been identified yet but the vehicles have.
- 4.2 Refers to a charge being applied if offending vehicles enter “THE ZONE”.
- 4.3 “Exact location of CAZ has yet to be determined”.
- 4.4 Refers to propose changes under “CONSIDERATION” This is interpreted as they may or may not happen. If these changes were to be adopted by Birmingham City Council, what would the cost be? Where will the funds come from for “Park and Ride”? Where will these “PARKS” will be situated?

5.2 The City has also put in a bid to the DFT for a scheme to install 197 electric charging points at key locations around the city to enable ULEV and electric hackney carriages and private hire vehicles to recharge. There are several different type of electrically powered vehicles.

Please note: There are no “ELECTRIC” vehicles available to the hackney trade. The new TX5 due to be rolling of the production line in September 2017. Even then it will first be offer to London drivers. We have not been given a date when it will be offered to Birmingham. The price tag is staggering £55,000

a.

No vehicles meet the most recent Euro VI/6 emissions standard and only 4% meet the Euro 5 standard introduced on 01.01.11. 21% meet Euro 4; 33% Euro 3; 2% Euro 2; 16% Euro 1 and 25% predate the Euro standards completely. The taxi fleet is, therefore, likely to be a major source of Particulate Matter and NOx emission in Birmingham.

Please note

- The DEFRA document titled “UK plan for tackling roadside Nitrogen Dioxide concentrations”(detailed plan) page 7 figure 3 shows that in London taxi contribution to the emissions is only 2%.
 1. The biggest pollution takes place when the city gets grid locked and traffic is at stand still and tails back for miles.
 2. A38 runs through the middle of the city and is the heaviest pollution generator caused mainly by commuters in their cars travelling to/from work.
 3. No evidence has been provided that the taxi fleet to be major source of pollution. Another reason not to remove taxis at the end of 2017.
 4. Better freight management (where goods vehicles who pollute the most in a traffic situation by stop and start, should only be allowed into the city at off-peak times).

8.3 We have such an old fleet of licensed vehicles because our lenient policy decisions in the past have been influenced by a wish to support the economic welfare of the drivers.

FACTS

In actual fact the economic welfare has been totally ignored.

The real reasons are, lack of enforcement for illegal plying for hire by out of town Private Hire. This resulted in hackney drivers fare counts being drastically reduced which meant the drivers earnings declined. The cost of fuel, living, and the insurance went through the roof. The country went into deep recession in 2007 which made it very difficult for drivers to achieve even the basic minimum wage hence the end result was that drivers simply could not afford to upgrade their vehicles.

Our licencing committee are failing in their “Duty of care” to Birmingham Hackney drivers; Even now we have more out of area cross border influx of drivers coming into Birmingham and hackney drivers see day in and day out their fares are being taken through illegal acts of plying for

hire. The hackney drivers are helpless and powerless to do anything. The lack of enforcement further increases the problem. Birmingham licensing could use its licensing conditions to restrict out of towners working in Birmingham as other councils like Knowsley are proposing to do. (*Liverpool echo newspaper 28/02/2017*).

The DEFRA document titled “UK plan for tackling roadside Nitrogen Dioxide concentrations” (detailed plan) page 12 paragraph 34 states “*local authorities in Great Britain also have powers to tackle local air pollution via the clean air act 1993*” therefore if the de-regulation act allows for out of town private hire to operate cross-border then the clean air act can restrict this behaviour as out of town private hire will be causing congestion and pollution.

We will now see even more P.H drivers in our city due to the relaxing of the private hire knowledge test.

Uber has been allowed to operate at will without vetting drivers. They are under cutting with ridiculous fare charges to drive the competition out. This makes it impossible to compete through unfair competition.

HOW COULD DRIVERS THEN GO AND BUY NEW REPLACEMENT VEHICLES WITH THE LACK OF SUPPORT AVAILABLE FROM THE GOVERNMENT AND BIRMINGHAM CITY COUNCIL IN MONETARY AND IN THE FORMS OF BETTER ENFORCEMENT TO UPGRADE THEIR VEHICLES. IT IS SIMPLY NOT AFFORDABLE SINCE THEIR EARNINGS HAVE DWINDLED, WHILST COMPETITION GROWS THE AMOUNT OF CUSTOMERS HAVE NOT GROWN AS THE LATEST UNMET DEMAND SURVEY SHOWS THAT BIRMINGHAM IS NOW ONLY AT 1% RATE FOR PASSENGERS HAILING A TAXI IN THE STREET.

We ask that you consider the following:

The trade has now fully realised that by 2020 they have to meet vehicles emissions standards. We have 3 years to plan as how best we are going to replace our vehicles/meet our vehicles emissions with assistance from the Government and Birmingham City Council.

- Not to impose restrictions on vehicles in December 2017 but wait as close as we can to 2020. The DEFRA document titled “UK plan for tackling roadside Nitrogen Dioxide concentrations” (an overview) states on page 10 paragraph 24 “*This package of measures will support delivery of our obligations on air quality in the shortest time possible. We are clear, however, that this must be done in a way that does not unfairly penalise ordinary working families who bought diesel vehicles in good faith.* By removing vehicles at the end of 2017 will be deemed as penalising the drivers and their families as there is no real affordable solution/vehicle to turn to as yet.
- Identify the pollution HOT SPOTS and work with the trade to de-congest pollution hotspots with hackney vehicles. (TOA TAXIS RADIO SYSTEM will work with licencing department if asked on achieving this).
- Secure realistic scrappage grants and grants towards new vehicles from the government. The trade requests that Birmingham City Council matches the Government’s grant. This funding can be achieved from the revenue generated through “emission zone charges”. The DEFRA document titled “UK plan for tackling roadside Nitrogen Dioxide concentrations” (detailed plan) page 38 reads “*the aim of a scrappage scheme would be to target support at those who are most likely to be most significantly impacted by measures to improve air quality*”.
- As new and used vehicles readily become available, the oldest cabs are then immediately replaced with new ones.

- The trade also asks that Birmingham City Council considers the impact this will have on Disabled people and of course the public at large.
- TOA carries over 50,000 wheelchairs per year. This does not include countless numbers that non-Toa drivers carry.
- Taxis are a form of 24 hour public hire service to take people home safely. Don't take this away the public who desperately depend on us.
- To look at alternative technology to reduce emissions on existing vehicles (retrofits)
- An independent report to be done on the air quality in Birmingham (showing how much taxis are contributing to the pollution and whether the proposed changes will actually improve the air quality to the desired standard)
- The DEFRA document titled "UK plan for tackling roadside Nitrogen Dioxide concentrations" (detailed plan) also states in paragraph 96;
"Government will assess plans to ensure they deliver the necessary air quality compliance, are fair, cost effective and where possible deliver wider benefits. Government will provide feedback on local Authorities' initial plans and will decide whether or not to approve final plans. A plan will only be approved by government and thus be considered for appropriate support if it can show that:
 - A. it is likely to cause NO2 levels in the area to reach legal compliance within the shortest time possible*
 - B. the effects and impacts on local residents and businesses have been assessed, including on disadvantaged groups, and there are no unintended consequences "*

The letter sent to the Prime Minister from the combined authorities highlighting issues are quite rightly asking the Government for help to tackle inner city pollution. The taxi trade is extremely disappointed in the licensing department that they have failed to take these issues into consideration when they decided to put this Policy forward for adoption

The City Council Committee on 15th Feb showed tremendous compassion towards the drivers' plight. The dead line is in 2020. We believe this deadline can be achieved even beyond 2020 by taking meaningful steps and working in unison with the Trade.

The trade is looking to their Council for their life changing support and saving the Iconic Black Cab from disappearing into the history books.

Please support our proposal.

These are some of the extracts taken from THE LONDON ASSEMBLY report for your consideration.

LONDON ASSEMBLY Environment Committee

DRIVING AWAY FROM DIESELS 2015

The ULEZ therefore will rightly penalise diesel vehicles older than the new Euro 6 standard entering central London. But even with the newest standard, the testing is inadequate and some certified Euro 6 diesel cars emit several times more pollution than the standard allows in real urban driving. The Mayor should press for effective new tests to be brought in soon. The Mayor

should also consider further tightening the ULEZ standard as circumstances allow. With a government scrappage scheme, the Mayor should consider removing all diesel cars from ULEZ exemption – other European cities are considering diesel bans. And, supported by effective charging infrastructure, the Mayor should bring forward from 2025 the date by which he proposes to restrict the exemption to zero-tailpipe-emission cars.

Older buses, like older HGVs, are heavy polluters. We support the Mayor's policy that, by 2020, double-deckers operating in central London should be Euro VI hybrids and that single-decker buses should be zero-emissions. TfL does not propose to retrofit its first 300 New Routemaster buses to make them Euro VI compliant, but instead to allow them to operate in the ULEZ without meeting the standards of other diesel vehicles. We are concerned that this undermines the credibility of the ULEZ, and sends out the wrong signal.

Reducing emissions from taxis and minicabs will require support and investment from the Mayor and Government. There is currently a shortage of zero-emission-capable taxi models on the market. On top of this, London doesn't have enough rapid charging points – a problem that affects taxis, minicabs and other vehicles. However, 2033 is too late a date for all taxis and minicabs to be zero-emission capable

Non-Road Mobile Machinery: 14%
Industry: 7%
Gas - Non-domestic: 9%
Gas - Domestic : 7%
Other: 1%
Ground-based Aviation: 8%
Motorcycle: <1%
Petrol Car: 7%
Diesel Car: 11%
Light Goods Vehicle (eg van): 5%
Rigid Heavy Goods Vehicle: 8%
Artic Heavy Goods Vehicle: 4%

TfL Bus NOX emissions¹⁷

London Atmospheric Emissions Inventory and Transport Emissions Road Map
Road diesel emissions are in red, other diesel in orange, and other or mixed fuels in blue

1.15 Recent statements by the Mayor and his environment adviser have indicated that compliance could be achieved by 2020, if there is sufficient support from national government. The measures the Mayor is asking for include a national scrappage scheme for older diesels and the reform of Vehicle Excise Duty to reflect emissions of local pollutants as well as CO₂.²³

There are still problems with Euro 6 diesel cars. Because of inadequate testing, some certified Euro 6 models emit several times more pollution than the standard permits in real urban driving. The Mayor should press for effective new tests to be brought in soon. The Mayor should also consider further tightening the ULEZ standard as circumstances allow. The Government should bring in a scrappage scheme for replacing a polluting vehicle with a cleaner one. With such a scheme, the Mayor should consider removing all diesel cars from ULEZ exemption. And, supported by effective charging infrastructure, the Mayor should restrict the exemption to zero-tailpipe-emission cars sooner than the proposed 2025.

3.7 Every vehicle, apart from taxis, entering the ULEZ from September 2020 will need to comply with a set of exhaust emission standards (Euro 4 for petrol and Euro 6 for diesel) or pay an additional daily charge (£12.50 for cars and vans, £100 for lorries and buses).

3.13 Even with the new Euro 6 standard, diesel cars and vans remain a problem. These vehicles (coming in now and compulsory from September) are considerably cleaner than earlier diesel models, but – as Appendix 2 shows – their NO_x emissions, realistically-tested, are still about six times higher than those of Euro 5 or 6 petrol's. For this reason, we heard from professors of air pollution and public health at Kings College London that no diesels – even Euro 6 vehicles – should be exempt from the ULEZ charge.

3.16 The Mayor has called for national funding for a scrappage scheme. People would be offered grants when scrapping a polluting diesel vehicle and purchasing a low-emission vehicle, such as a plug-in hybrid. A similar scheme in 2009-10 saw 392,000 cars removed from the road.²⁹ The Mayor's adviser argued that this could be close to fiscally-neutral, if VAT receipts on the new purchase and the stimulus to UK manufacturing were considered.³⁰ Some older petrol vehicles, not complying with Euro 4, would also need to be replaced. A scrappage scheme or similar support may be particularly important to ease the compliance of the light goods and commercial fleet.

3.18 There are currently few alternatives to diesel-powered HGVs, and we therefore agree that Euro VI heavy vehicles should be exempt from the ULEZ charge until lower emission alternatives are widely available. Over the longer term, lower emissions from HGVs will be possible with new technology (such as hybrid, plug-in electric or hydrogen fuel cell) and better freight management (reducing the use of HGVs by planning deliveries better and making more use of smaller vehicles for smaller deliveries)

Reducing emissions from taxis and minicabs will require support and investment from the Mayor and Government. There is currently a shortage of zero-emission-capable taxi models on the market. On top of this, London doesn't have enough rapid charging points – a problem that affects taxis, minicabs and other vehicles

4.7 Taxis (black cabs) are a significant source of pollution in central London and are rightly subject to regulatory action to reduce this. However, past and current regulation is responsible for the emissions of the current taxi fleet, and it is not feasible to expect the trade to implement radical changes without sufficient support or viable alternatives to diesel engines.

Reducing the age of diesel taxis

4.8 The Mayor had proposed that, from 2020, the age limit on taxis would be reduced from 15 to 10 years. However, this proposal has been withdrawn in the face of opposition from the trade (and questioning by this Committee). Instead, the new proposal is to supplement the existing 15-year limit with a subsidy of up to £5,000 for voluntary decommissioning of taxis over 10 years old.

Introducing zero-emission capable taxis

4.9 From 2018, all newly registered taxis will have to be 'zero-emission capable' (plug-in petrol-electric hybrid, fully electric or similar). While we support this move, we also have concerns about how this will be implemented and the impact on the taxi trade.

4.10 Until there are enough zero-emission capable taxis on the market, and enough rapid charging points in central London, it will be difficult for the taxi trade to switch away from diesel vehicles. Indeed, the two issues are related; the London Taxi Drivers' Association (LTDA) told us that manufacturers are not launching new electric taxis because of the lack of rapid charging points in central London. And Nissan has also cited the zero-emission requirement as a reason for suspending the launch of its planned petrol London taxi, which would have been cleaner than existing commercial models and was to have been the precursor to an all-electric model.³³ TfL is confident that suitable vehicles will be on the market from 2017, on the basis of undisclosed 'working with a number of manufacturers'. It has announced a grant scheme with a £3,000 supplement to the £5,000 available from the government's Office for Low Emission Vehicles to support the purchase of plug-in taxis. This, and the voluntary decommissioning grant, are to be paid for by a fund of £65 million secured by TfL with government support.³⁴ The Government has also recently confirmed £10 million of additional funding for a rapid-charging network in London.³⁵

Timetable

4.11 Under current plans with the 15-year age limit, London's taxi fleet may not be fully zero-emission capable until 2033. Some, heavily polluting, Euro 5 diesel vehicles will not qualify for the voluntary decommissioning grant until 2025 and could still be operating in London until 2030, and Euro 6 diesels (many inadequately tested) for three years after that (whereas it is proposed that by 2025 private cars and minicabs will all be subject to the ULEZ charge unless they are fully zero-emission). The Mayor should therefore encourage the rapid phasing out of Euro 4 and 5 taxis from 2018 and their replacement with zero-emission capable models.

4.14 Questions were raised during our investigation, but not answered, as to how electric and plug-in hybrid minicabs will charge up. Many minicab (and taxi) drivers keep their vehicles at home and do not have access to off-street parking, which would enable them to charge a vehicle outside of working hours. There will increasingly be a need for a network of rapid charging points available for minicabs and other vehicles across London.³⁶

5. Minority opinion from the GLA Conservatives

5.1 The GLA Conservatives are unable to support the findings of this report. We are particularly concerned about the recommendations to bring forward the ULEZ from 2020 and to impose additional restrictions from the outset, such as an increased daily charge for vehicles, a further tightening of ULEZ standards, and to widen the ULEZ area beyond the Congestion Charge Zone.

5.2 We do not feel that there would be sufficient benefit to justify the additional restrictions and costs to vehicle owners, or the impact on London's economy that these measures are likely to bring.

5.3 We strongly feel that a far better approach to tackling diesel is through a focus on incentives, including a diesel scrappage scheme, as well as the taxi incentives recently announced by the Mayor.

5.4 We would therefore request that our opposition to this report be noted.

Recommendation 9

The Mayor should, in his response to this report, set out (following further consultation with the taxi industry where necessary) how:

- Sufficient zero-emission capable taxis will be available from 2018 to support the requirement that all new taxis must meet this standard
- The necessary infrastructure (rapid charging network and/or hydrogen stations) will be delivered to enable a large fleet of zero-emission capable taxis, and another of minicabs, to operate across London from 2018
- The heavily-polluting pre-Euro 6 taxis will be phased out before 2025, rather than between then and 2030

The trade has not been given the full facts as to how the licencing committee seek to put this into practise without jeopardising drivers' livelihoods and the service the trade provides to the public at large.

Thank you for taking your time to consider this proposal.



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