

## Hackney Carriage Vehicle Age, MOT and Retrofit Requirements

Current Policy	Consultation Proposal	Recommended Policy	Commentary
<p><b>1. Emissions</b></p> <p>Birmingham City Council will not license or permit the use of any vehicle as a hackney carriage after 31 December 2019 that does not meet the minimum emission standards of Euro 4 for petrol engines, Euro 6 for diesel engines or is Ultra Low Emission or a Zero Emission Capable Vehicle.</p>	No Change from current policy	<p>The emission standard that is applicable to vehicles from 1<sup>st</sup> January 2020 will be repealed. In its place we will apply a strict age policy for hackney carriage vehicles which will be a maximum of 15 years (see section 2 below). This policy will apply from 1<sup>st</sup> January 2020.</p> <p>Vehicles that do not meet the CAZ emission standards for their type of fuel will not be exempted from paying the daily CAZ charge.</p>	<p>This is a significant change from the consultation proposal. The recommendation is to remove the emissions standard as the criteria for licensing vehicles and to replace it with a strict age policy. This will ensure that significantly more hackney carriages are still working after 1<sup>st</sup> January 2020. Whereas the proposed policy might result in only 31 hackney carriages able to work from that date (plus 65 that have already converted to LPG), the recommended policy would enable up to 493 vehicles (plus the 65 LPG conversions) to work after 1<sup>st</sup> January. It will however remove 625 of the oldest and most polluting vehicles from the road</p> <p>To exempt vehicles from the CAZ charge would remove any</p>

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			incentive for owners to replace their vehicles with cleaner vehicles.
<b>2. Age / Vehicle Licence Grant</b>  No vehicle over the age of 14 years will be granted a licence.	From 1 <sup>st</sup> January 2020 no hackney carriage vehicle may remain licensed after it reaches the age of 14 years unless it has already been converted under Birmingham's LPG pilot scheme, in which case it can remain licensed until 31 December 2025, regardless of its age.	From 1 <sup>st</sup> January 2020 no diesel hackney carriage vehicle will be granted a licence after it reaches the age of 15 years unless it has already been converted under Birmingham's LPG pilot scheme, in which case it can remain licensed until 31 December 2025, regardless of its age.  With immediate effect a ULEV vehicle will have an age limit of 18 years.	We have increased the age limit for diesels from 14 years to 15 years which has the effect of aligning our policy to London and increasing the number of vehicles eligible to carry on working after 1 <sup>st</sup> January 2020.  Allowing ULEV vehicles an additional 3 years acts as an incentive for drivers to buy them and recognises that a longer period is required for drivers to recover their investment given the higher purchase price of ULEVs.
<b>3. Vehicle Licence Renewal</b>	This was not an aspect of the original proposals and has arisen out of discussions with trade representatives.	No licences will be renewed after 1 <sup>st</sup> January 2020 for any vehicle that is more than 15 years old.  Any vehicle that is more than 15 years old on 1 <sup>st</sup> January 2020 will remain licensed until the expiry of its vehicle	This is a significant change from the proposal. Under the proposal any vehicle that did not meet the CAZ emissions standard on 1 <sup>st</sup> January 2020 would have to stop work on that day. The recommended policy will see a

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		<p>licence before 1<sup>st</sup> January 2021.</p> <p>Vehicles that do not meet the CAZ emission standards for their type of fuel will not be exempted from paying the daily CAZ charge</p>	<p>gradual reduction in the number of vehicles that can continue to work throughout 2020 instead of a sudden loss of vehicles on 1<sup>st</sup> January 2020.</p>
<p><b>4. Supplementary Test Plus / Exceptional Condition Test</b></p> <p>No vehicle over the age of 14 years will have its licence renewed unless the vehicle is able to pass the <u>Supplementary Test Plus*</u>, in which case the vehicle licence may be renewed on a year by year basis, subject to passing the <u>Supplementary Test Plus</u> on each occasion.</p> <p>*Also referred to as the 'Exceptional Condition Test'</p>	<p>We will discontinue the Supplementary Test Plus.</p>	<p>From 1<sup>st</sup> January 2020 we will discontinue the Supplementary Test Plus (exceptional condition test) except for the case of CVRAS retrofitted hackney carriages that are allowed to go over the 15 year age limit.</p>	<p>The recommendation is the same as the proposal with the addition of the provision for CVRAS retrofitted hackney carriages. This will require all vehicles to be replaced when they reach the 15- year age limit (subject to the exemption for CVRAS approved retrofitted technology and the higher age limit for ULEV vehicles) and will help to future-proof the fleet of licensed vehicles in relation to compliance with more stringent emission standards.</p>
<p><b>5. Licence Transfer</b></p> <p>A hackney carriage vehicle licence may only be transferred to another</p>		<p>A hackney carriage vehicle licence may only be transferred to another vehicle (that is to say separated from</p>	<p>We do not propose to change this policy. Maintaining this requirement means that each</p>

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vehicle (that is to say separated from its related vehicle and moved to another vehicle) that is younger/newer than the age of the vehicle currently licensed.		its related vehicle and moved to another vehicle) that is younger/newer than the age of the vehicle currently licensed.	time that a vehicle is replaced it is always replaced with a newer vehicle.
<b>6. MOT Test</b>  All vehicles are subject to a standard MOT test to determine its mechanical fitness and a more stringent supplementary test dealing with the vehicle's condition, appearance and suitability prior to licensing.		All vehicles are subject to a standard MOT test to determine its mechanical fitness and a more stringent supplementary test dealing with the vehicle's condition, appearance and suitability prior to licensing. Any vehicle that is licensed after the age of 15 will be subject to 2 MOT tests per year.	We have increased the frequency of MOT tests to 2 per year for all vehicles that are older than 15 years. This will include ULEV vehicles and retrofit conversions.
<b>7. LPG Retrofit Conversions</b>  65 vehicles have been converted under the Birmingham pilot project, conducted with the Department of Transport and DEFRA. They have been approved to be licensed until 31 December 2025 irrespective of their age.	We will allow hackney carriage vehicles that are under 14 years old at 1 <sup>st</sup> January 2020 to be converted to LPG by an approved CVRAS garage and those vehicles may remain licensed until 31 December 2025, regardless of whether the cost of conversion is paid for by a government grant or privately by the vehicle owner.	With immediate effect we will allow any hackney carriage vehicles to be converted to LPG before 1 <sup>st</sup> January 2024 by an approved CVRAS garage, (regardless of the age of the vehicle) provided the garage is satisfied that the mechanical and structural condition of the vehicle is of a high enough standard that the vehicle is safe, and those vehicles may remain licensed until 31 December 2025, regardless of whether the cost of	This is a significant change from the proposal. Under our proposal the 14 year-age limitation would have restricted the pool of potential conversions to only 113. The recommendation will enable the owner of any TX type hackney carriage (i.e. the traditional London taxi cab shape) to put their vehicle forward for conversion, subject to it being in good enough

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		<p>conversion is paid for by a government grant or privately by the vehicle owner. If it becomes necessary to prioritise applications for government grant assistance towards the cost of conversion we will give priority to the youngest vehicles.</p> <p>Once a vehicle passes 15 years old it would be subject to two MOTs a year and our Supplementary Test Plus (exceptional condition test).</p>	<p>condition to last until 31 December 2025.</p> <p>At the time of writing there are no CVRAS approved retrofit conversions for non-TX type hackney carriages ('van conversions', such as Mercedes, Peugeot or Citroen).</p> <p>The requirement for vehicles over 15 to have two MOT tests and pass the Supplementary Test Plus will offer the Committee reassurance that these older vehicles are being maintained to a good standard.</p>
<b>8. Availability of LPG Retrofit Conversions</b>	This was not an aspect of the original proposals and has arisen out of discussions with trade representatives.	A hackney carriage that has been accepted by a CVRAS approved garage as being suitable for conversion may continue to be licensed after 1 <sup>st</sup> January 2020, despite not having been converted to LPG, and despite being more than 15 years old, provided the owner can evidence that they have entered into a binding contract with a CVRAS approved garage for an LPG	There is only one company approved by the CVRAS to convert TX hackney carriages to LPG in the Midlands. The garage is based in Alcester. The company in Alcester is carrying out conversions on taxis from London and has limited capacity to deal with the level of demand that may come from

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		conversion. This exemption will not go beyond 31 <sup>st</sup> December 2020.	Birmingham. Lengthy waiting lists are likely to develop. In order not to disqualify suitable vehicles from conversion because they cannot meet the 1 <sup>st</sup> January 2020 deadline due to the lack of supply, we are recommending that a hackney carriage that has been accepted by a CVRAS approved garage as being suitable for conversion may continue to be licensed after 1 <sup>st</sup> January 2020, despite not having been converted to LPG or being more than 15 years old, provided the owner can evidence that they have entered into a binding contract with a CVRAS approved garage for an LPG conversion.
<b>9. Payment of the CAZ Daily Charge</b>	This was not an aspect of the original proposals and has arisen out of discussions with trade representatives.	Vehicles that are waiting for an approved CVRAS retrofit conversion that have not been converted by 1 <sup>st</sup> January 2020 will be exempt from the daily CAZ charge provided the owner has entered into a binding contract	Allowing drivers an exemption from the daily CAZ charge recognises the fact that the inability of an owner to convert a vehicle may be due to factors beyond their control.

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		with a CVRAS approved garage for an LPG conversion, until such time that the conversion is completed.	
<b>10. Owner Conversions</b>	Any attempts by drivers to carry out their own conversions (such as by putting petrol engines into diesel vehicles) can only be done with the specific approval of Licensing and they will still be subject to the age rules	Any attempts by drivers to carry out their own conversions (such as by putting petrol engines into diesel vehicles) can only be done with the specific approval of Licensing and they will still be subject to the age rules. Only a CVRAS approved conversion gives the right to operate until December 2025 and an owner conversion will not be financially supported by the council.	The recommendation is the same as the proposal, but we have emphasised that owners own conversions do not provide the same benefits as a CVRAS approved conversion. The council does not guarantee that an owner conversion will be recognised for the purposes of a CAZ.
<b>11. 2026 ULEV Requirement</b>	<b>That from 1 January 2026 all licensed vehicles</b> (hackney carriage and private hire) must be Ultra Low Emission or Zero Emission Capable (ZEC) Vehicles. An Ultra-Low Emission Vehicle is defined by the Office for Low Emission Vehicles as emitting less than 50g CO <sub>2</sub> /km and able to travel at least 70 miles without any emissions at all.	<b>That from 1<sup>st</sup> January 2021 all newly licensed vehicles</b> (vehicles licensed by Birmingham for the first time) must be Ultra Low Emission or Zero Emission Capable Vehicles. An Ultra-Low Emission Vehicle is defined by the Office for Low Emission Vehicles as emitting less than 50g CO <sub>2</sub> /km and able to travel at least 70 miles without any emissions at all.	This is a significant change. Under the original proposal <b>all</b> vehicles would have to be ULEV or ZEC from 1 <sup>st</sup> January 2026, regardless of their age or of the fact that they would already be compliant with the minimum emission standards for the CAZ. The new recommendation would only require <b>vehicles being licensed for the first time</b> to be ULEV or ZEC capable, but would

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			<p>allow vehicles that we already license to continue until the expiry of their age limit (which would be 15 years).</p> <p>A 2026 ULEV condition for new vehicles would have meant that there would be very low uptake of ULEVs up to 2025, at which point the majority of the fleet will have been replaced meaning there would probably not be significant deployment of ULEV hackney carriages until approximately 2040.</p> <p>By bringing forward the ULEV requirement on new vehicles from 2026 to 2021 ensures a reasonable level of ULEV deployment by 2025.</p>
<b>12. 2030 ULEV Requirement</b>	From 2030 we will only grant <b>new</b> licences to fully electric vehicles	From 2030, if technology options are on the market, to only grant <b>new</b> licences to fully electric vehicles and zero emission vehicles (e.g. battery	This change recognises that so much might change between now and 2030 in terms of technological development that



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		electric or hydrogen fuel cell vehicles). To be reviewed before 2025.	we would only seek to set out our direction of travel at this stage, and that a firmer policy should be developed before 2025 when we will have better knowledge about the availability of vehicles with alternative fuels.