

APPENDIX 2

Private Hire Vehicle Age, MOT and Retrofit Requirements

Current Policy	Consultation Proposal	Recommended Policy	Commentary
<p>1. Emissions</p> <p>Birmingham City Council will not license or permit the use of any vehicle as a private hire vehicle 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The emission standard that is applicable to vehicles from 1st January 2020 will be repealed. In its place we will apply a strict age policy for private hire vehicles which will be a maximum of 12 years (see section 2 below). This policy will apply from 1st 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 private hire vehicles are still working after 1st January 2020. Under the proposed policy 3,621 vehicles would need to be replaced, under the recommended policy only 1,442 will need to be replaced which are the oldest and most polluting vehicles .</p> <p>To exempt vehicles from the CAZ charge would remove any incentive for owners to replace their vehicles with cleaner vehicles.</p>
2. Age / Vehicle Licence Grant	From 1 st January 2020 no private hire	From 1 st January 2020 no private hire	This is a significant change from

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<p>No vehicle over the age of 8 years will be granted a licence.</p>	<p>vehicle may remain licensed after it reaches the age of 8 years.</p>	<p>vehicle may remain licensed after it reaches the age of 12 years.</p>	<p>our proposed policy, increasing the age limit for private hire vehicles from 8 to 12 years.</p> <p>This change has been recommended to make our policy consistent with that of Wolverhampton City Council which has an age policy of 12 years for private hire vehicles. If Birmingham introduces a lower age limit it would be creating an incentive for Birmingham drivers to acquire licences in Wolverhampton. They would be able to continue to work in Birmingham under a Wolverhampton operator.</p>
<p>3. Vehicle Licence Renewal</p>	<p>This was not an aspect of the original proposals and has arisen out of discussions with trade representatives.</p>	<p>No licences will be renewed after 1st January 2020 for any vehicle that is more than 12 years old.</p> <p>Any vehicle that is more than 12 years old on 1st January 2020 will remain licensed until the expiry of its vehicle licence before 1st January 2021.</p>	<p>This is a significant change from the proposal. Under the proposal any vehicle that did not meet the CAZ emissions standard on 1st January 2020 would have to stop work on that day. The recommended policy will see a gradual reduction in the number of vehicles that can continue to</p>

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		Vehicles that do not meet the CAZ emission standards for their type of fuel will not be exempted from paying the daily CAZ charge	work throughout 2020 instead of a sudden loss of vehicles on 1 st January 2020.
<p>4. Supplementary Test Plus / Exceptional Condition Test</p> <p>No vehicle over the age of 8 years will have its licence renewed unless the vehicle is able to pass the Supplementary Test Plus*, in which case the vehicle licence may be renewed on a year by year basis, subject to passing the Supplementary Test Plus on each occasion.</p> <p>*Also referred to as the 'Exceptional Condition Test'</p>	We will discontinue the Supplementary Test Plus.	From 1 st January 2020 we will discontinue the Supplementary Test Plus (exceptional condition test) except for the case of CVRAS retrofitted vehicles that are allowed to go over the 12 year age limit.	The recommendation is the same as the proposal with the addition of the provision for CVRAS retrofitted vehicles. This will require all vehicles to be replaced when they reach the 12- year age limit (subject to the exemption for CVRAS approved retrofitted technology) and will help to future-proof the fleet of licensed vehicles in relation to compliance with more stringent emission standards.
<p>5. Licence Transfer</p> <p>A licensed private hire vehicle can only be replaced, swapped or changed with a vehicle that is less than 8 years old.</p>		A licensed private hire vehicle can only be replaced, swapped or changed with a vehicle that is less than 12 years old.	This ensures that the licence transfer requirement is consistent with the new recommended age limit.

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<p>6. MOT Test</p> <p>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.</p>		<p>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.</p>	<p>We do not propose to change the requirement for MOT testing vehicles that are not more than 12 years old.</p>
<p>7. Approved CVRAS Retrofit Conversions</p>		<p>With immediate effect we will allow any private hire vehicle to be fitted with approved CVRAS technology before 1st 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 retrofitting the vehicle 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</p>	<p>This has been introduced to make our private hire vehicle policy consistent with our hackney carriage policy. However it should be noted that at the time of writing the CVRAS has not approved any technical solution for private hire vehicles.</p> <p>The requirement for vehicles over 12 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>

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		<p>priority to the youngest vehicles.</p> <p>Once a vehicle passes 12 years old it would be subject to two MOTs a year and our Supplementary Test Plus (exceptional condition test).</p>	
8. Availability of CVRAS Approved Retrofit Technology	This was not an aspect of the original proposals.	A private hire vehicle that has been accepted by a CVRAS approved garage as being suitable for retrofit technology may continue to be licensed after 1 st January 2020, despite not having been converted and despite the vehicle being over 12 years old, provided the owner can evidence that they have a binding contract with a CVRAS approved garage for the conversion. This exemption will not go beyond 31 st December 2020.	This has been introduced to be consistent with the hackney carriage policy recommendation in the event that lengthy waiting lists might develop if a suitable technical solution is approved.
9. Payment of the CAZ Daily Charge	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 st January 2020 will be exempt from the daily CAZ charge provided the owner has entered into a binding contract with a CVRAS approved garage for an	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. The 6 months limitation is to protect

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		approved conversion, until such time that the conversion is completed, subject to a maximum limit of 6 months from 1 st January 2020.	against continued delays in installation.
10. Owner Conversions	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 the CAZ.
11. 2026 ULEV Requirement	That from 1 January 2026 all licensed vehicles (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 ₂ /km and able to travel at least 70 miles without any emissions at all.	That from 1st January 2021 all newly licensed vehicles (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 ₂ /km and able to travel at least 70 miles without any emissions at all.	This is a significant change. Under the original proposal all vehicles would have to be ULEV or ZEC from 1 st 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 vehicles being licensed for the first time to be

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			<p>ULEV or ZEC capable, but would allow vehicles that we already license to continue until the expiry of their age limit (which would be 12 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 private hire vehicles until approximately 2035.</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>
12. 2030 ULEV Requirement	From 2030 we will only grant new licences to fully electric vehicles	From 2030, if technology options are on the market, to only grant new licences to fully electric vehicles and zero emission vehicles (e.g. battery electric or hydrogen fuel cell vehicles).	This change recognises that so much might change between now and 2030 in terms of technological development that we would only seek to set out

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		To be reviewed before 2025.	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.