

Proposals to introduce Emission Standards for Taxi and Private Hire Vehicles Response of 24 7 Carz

5. Do you understand that the reason for the proposed policy is because of the impact that pollution is having on the health of people who live and work in Birmingham?

**Yes and 24 7 Carz agrees that this issue needs addressing. The complicating factor is that the government is only now consulting on “Improving air quality in the UK: tackling nitrogen dioxide in our towns and cities Draft UK Air Quality Plan for tackling nitrogen dioxide”<sup>1</sup>. The consultation period on this document ends on the 15<sup>th</sup> of June 2017 and the final Air Quality Plan will not be published until the 31<sup>st</sup> of July 2017. There are a number of proposals set out in that document, which will impact upon this consultation and the proposals set out within it. Those proposals, most importantly retrofitting devices which reduce harmful emissions ought to be able to implemented, as part of the proposals for hackney carriages and private hire vehicles.**

6. If you are a vehicle owner, would the proposed changes to licensing policy require you to update your vehicle(s)? If you are not a vehicle owner please select 'Not a vehicle owner'

**Whilst 24 7 Carz does not own vehicles itself, the vast majority of our drivers do own their own vehicles. Discussions with those drivers have informed us that, in line with the council’s own research, that the large majority will have to replace their vehicles as part of these proposals.**

7. The draft policy sets out proposals to remove the oldest vehicles that emit the highest levels of pollution first. Do you agree that this is the right approach?

**24 7 Carz agree that those vehicles which are most polluting will need to be replaced first, unless modifications can be made to ensure that the vehicles emit substantially less pollutants.**

**Yes but why does the council propose to set standards for hackney carriages and private hire vehicles, which exceed the minimum standards required by a Clean Air Zone, that the vehicles be Euro 4 for petrol and Euro 6 for diesel.**

**The requirements for new or replacement vehicles from December 2017 and onwards far exceed the requirements of hackney carriages and private hire vehicles for a Clean Air Zone. From December 2018, the requirement for petrol private hire vehicles will also exceed that of a Clean Air Zone. The requirement is that the vehicle be Euro 4 petrol, yet the requirement will be that the vehicle is Euro 5.**

**24 7 Carz submit that setting the requirement above the minimum requirement set by the government is not justified in Birmingham. The reason for this is that the government research indicates that taxis are not minimal contributors to NOx concentrations, see table 3 c, at page 14**

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<sup>1</sup> <https://www.gov.uk/government/consultations/improving-air-quality-reducing-nitrogen-dioxide-in-our-towns-and-cities>

of the Draft Air Quality Plan.<sup>2</sup> The report does not define taxis, though it would seem that it is referring to hackney carriages, rather than including private hire vehicles.

9. Do you think that the proposals allow sufficient time for vehicle owners to update their vehicles to meet the emission standards?

**24 7 Carz do not believe that the policy, with the current time limits will give vehicle owners sufficient time to change vehicles. There is a large amount of confusion amongst drivers as to what the requirements will be. 24 7 Carz have provided information to drivers in an easier to understand format, but this has not dealt with the concerns that drivers have.**

**The times scales for implementation will be very tight, given the fact that the consultation ends on the 9<sup>th</sup> of June and that the matter will then have to be considered by the Committee. The lead in time will be very short to implementation. Only once the policy has been agreed will drivers know what the requirements will actually be. Once that has been done then the drivers will have to: work out a budget, agree finance and purchase a vehicle in a relatively short space of time, for those vehicles where the licence expires in December or January.**

**The issue is further complicated by the fact that the DEFRA Draft Air Quality Plan at paragraphs 167 to 169 discusses the Clean Vehicle Technology Fund, which Birmingham City Council accessed in relation to modifying hackney carriages to LPG. The plan states that there will be a series of workshops aimed at Local Authorities to share experience and evidence. The plan indicates that Clean Vehicle Retrofit Accreditation Scheme (CVRAS) will commence in 2017, see paragraph 169. 24 7 Carz believes that it would be premature to bring in the changes proposed before the scope of the CVRAS is known.**

**The modification of existing vehicles is of great interest to our drivers. The capital investment is much less than in purchasing a new car. Modified vehicles are also likely to have a better resale price in due course than current vehicles, as such vehicles will be more attractive to private buyers on a tight budget.**

**A high proportion of 24 7 Carz drivers do not work full time. Those drivers who do not work full time, in particular, have indicated that: 1) they may well leave the trade, or 2) look to licence with an alternative local authority, should the policy be put into effect without amendment.**

10. If you answered no to the last question, what deadlines do you think we should apply in order to ensure that Birmingham meets the minimum Clean Air Zone standards of Euro 4 for petrol vehicles and Euro 6 for diesel vehicles by 2019?

**No changes should occur until we know what the final DEFRA Air Quality Plan states and also what is the scope of the CVRAS, so that drivers can research whether or not such modifications are available for their vehicle and/or financially viable.**

**As an alternative, the requirements should be that renewals of vehicles be allowed as long as they meet Euro 4 for petrol and Euro 6 for diesel until at least December 2019. Newly licensed vehicles and renewals which have been fitted with a CVARS accredited modification be allowed to be licensed.**

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<sup>2</sup> [https://consult.defra.gov.uk/airquality/air-quality-plan-for-tackling-nitrogen-dioxide/supporting\\_documents/Draft%20Revised%20AQ%20Plan.pdf](https://consult.defra.gov.uk/airquality/air-quality-plan-for-tackling-nitrogen-dioxide/supporting_documents/Draft%20Revised%20AQ%20Plan.pdf)

11. Do you agree with the age policy that we have proposed that would take effect in 2021 of 14 years for hackney carriages and 8 years for private hire vehicles?

**No. Vehicles over 14 and 8 years respectively can, if well maintained and driven in an eco-friendly manner, work perfectly well beyond 14 and 8 years. The traditional hackney vehicle is built to last, given the cost of purchase, as are most modern cars. The possibility of retro-fitting mechanisms by which emissions can be reduced, shows that the useful working age of all hackney and private hire vehicles can be prolonged. Imposing a fixed terminal age on hackney and private hire vehicles is not good for the environment. Vehicles consume a large amount of energy during the production process, what needs to be encouraged is the extension of the working life of a vehicle, provided that harmful emissions of older vehicles can be kept at the appropriate level.**

12. If you answered the last question to say that there should be different age limits, what age limits would you suggest?

**That there be no age limit for vehicles which are classed as ULEV, including those where accredited modifications are made to vehicles so that they become ULEV. This would then encourage drivers to purchase a ULEV or modify a non-ULEV vehicle so that it becomes ULEV.**

13. The most significant impact of the proposals is likely to be felt by hackney carriage owners due to the limited choice of suitable ultra-low emission vehicles on the market and the cost of buying a new hackney carriage. One option that has been put forward is that Birmingham should consider licensing a mixed fleet of wheelchair accessible 'London style' cabs and saloon vehicles as hackney carriages? Would you be in favour of this proposal?

**No.**

14. If you have answered no to the last question, what are your reasons for opposing a mixed fleet of hackney carriages?

**The hackney fleet in Birmingham is distinctive and this is a positive factor which enhances the status of the city and the hackney fleet. Hackney vehicles work predominantly in the city centre, when compared with the private hire fleet.**

**Those hackneys which are 'London style' would face the fact that the cost of purchase and running such a vehicle would be uncompetitive when compared the saloon hackney carriages.**

15. Do you agree that Birmingham should aim for all of its licensed hackney carriages and private hire vehicles to be zero-emission vehicles by 2030?

**Yes.**

16. How significant do you think the impact on disabled passengers would be if there were fewer wheelchair accessible hackney carriages licensed by Birmingham? Can you support your answer with any data?

**We are not in a position to be able to comment on this.**

17. The cost of buying a new hackney carriage or private hire vehicle is likely to be substantial. If you are a licensed vehicle owner or driver would you consider renting or hiring a vehicle as an alternative to buying one?

**24 7 Carz do not own vehicles or rent them to drivers. It does not fit within our business model. This is because our drivers much prefer to own their own vehicle. When discussing the issue with our drivers, they have made the following 2 points: 1) they are reluctant to enter into the commitment of long term rental agreements, which are necessary to obtain a lower rent charge, 2) many drivers work part-time and find that the short-term rental agreements are prohibitively expensive.**

19. Is there anything that you think the City Council or the Government can do to help vehicle owners to drive cleaner, less polluting vehicles or to reduce levels of air pollution in the city?

**Postpone adopting a definitive policy until the government have agreed upon criteria for retrofitting which is compatible with the Clean Air Zone requirements under CVARS.**

**Provide similar assistance to private hire drivers as is provided to hackney carriage owners who are converting their vehicles to LPG.**

**Introduce charging for all non-compliant vehicles who enter the Clean Air Zone, that way the public will be encouraged to reduce unnecessary journeys into the zone. The public would then be given an incentive to use public transport, the private hire and hackney trade.**

20. Is there anything else that you would like to say about the proposals that you have not said so far?

**The statistics which set out the source of NO<sub>x</sub> pollution as provided in the Draft Air Quality Plan at figure 3c on page 14 of the document, indicate that diesel 'taxis' cause a very small amount of the NO<sub>x</sub> roadside concentrations outside of London. The conclusion to be drawn from this is that the wholesale changes to the hackney and private hire vehicle fleet will have limited effect in reducing the harmful emissions of NO<sub>x</sub>.**

**24 7 Carz estimate that fewer than 20% of our bookings enter the area of the proposed Clean Air Zone. The figures for hackney vehicles, will be higher, because hackney vehicles traditionally serve the city centre through the ranks. 24 7 Carz private hire vehicles do not enter and remain in the Clean Air Zone a great deal. Our vehicles do not therefore contribute significantly to the NO<sub>x</sub> pollution in the city centre, especially when compared to ordinary car journeys into the Clean Air Zone.**

**The result is that the changes proposed will impose a heavy cost burden onto the private hire trade with little or no improvement through reduced NO<sub>x</sub> emissions within the Clean Air Zone.**