

Appendix 3

Consultation on the proposed taxi licensing condition changes - report

1st March 2019

Element Energy Ltd

A study conducted for



RECAP – Questions of the survey

Age limits

1. Do you agree with the proposal to limit the age of hackney carriage vehicles so that they cannot be licensed after the age of 14?
2. Do you agree with the implementation date for this proposal of 1 January 2020?
3. Do you agree with the proposal to limit the age of private hire vehicles so that they cannot be licensed after the age of 8 years?
4. Do you agree with the implementation date for this proposal of 1 January 2020?

Retrofit

5. Do you agree that we should extend the life of hackney carriages with approved CVRAS retrofit technology until 31 December 2025?

2026 ULEV stock condition

6. Do you agree that Birmingham should adopt this policy in order to improve air quality in the city?
7. Do you agree with the date that we have suggested for the implementation of this policy?

2030 BEV licencing condition

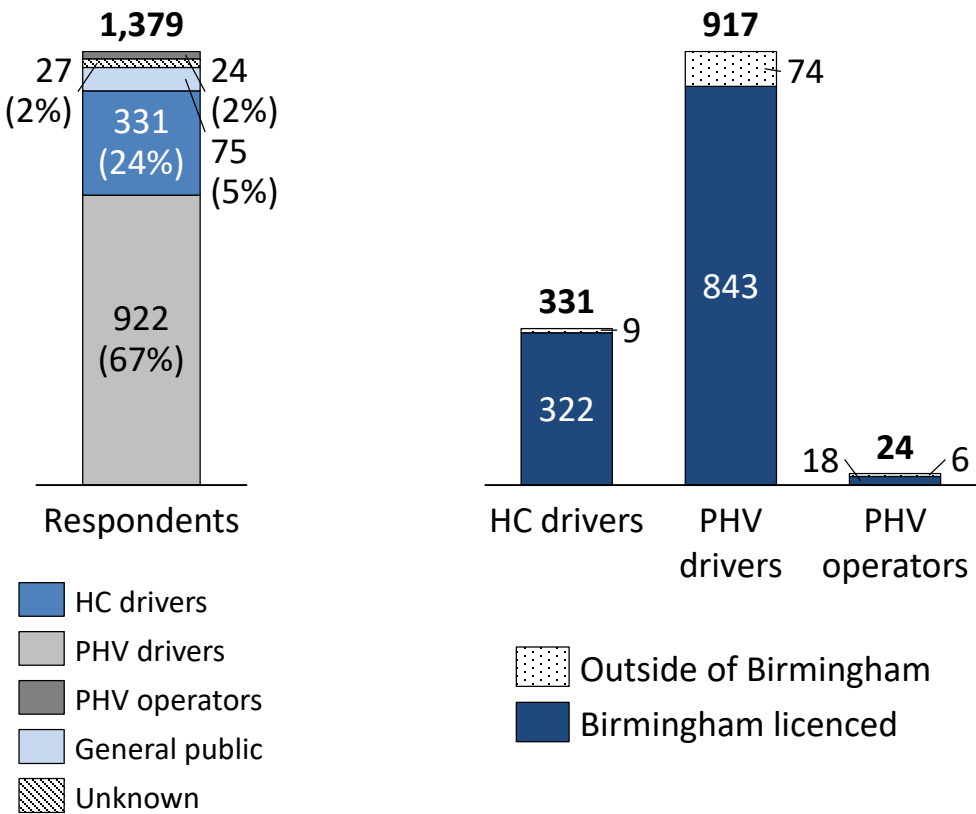
8. Do you agree that Birmingham should adopt this policy in order to improve air quality in the city?
9. Do you agree with the date that we have suggested for the implementation of this policy?

Other comments:

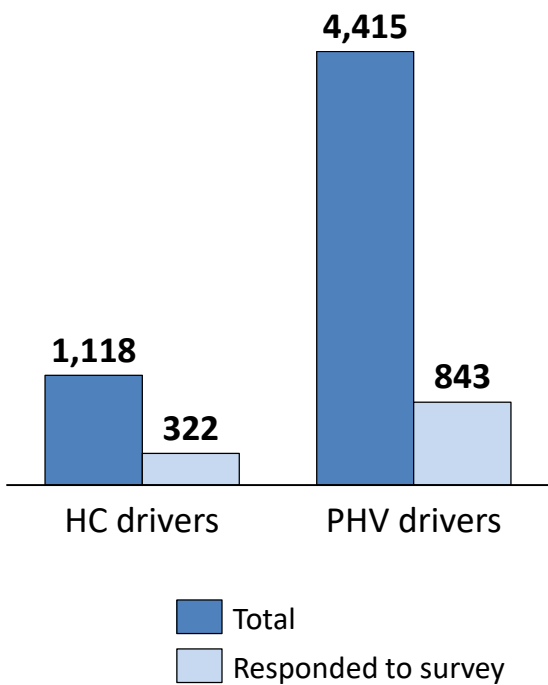
10. Please make any other comments here about our proposals, including alternative ideas or suggestions that you might have for an emissions and vehicle age policy

The survey was taken by 1,379 respondents, the majority of which were Private Hire Vehicles drivers

In total 1,379 respondents took the survey

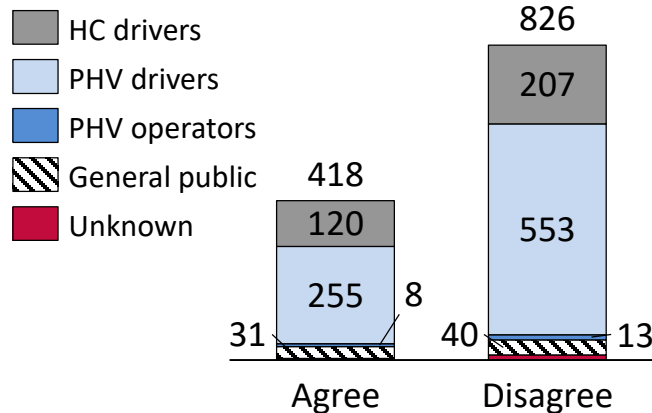


30% of HC drivers and 20% of PHV drivers responded to the survey



1. Do you agree with the proposal to limit the age of hackney carriage vehicles so that they cannot be licensed after the age of 14?

Number of respondents: 1,244



- ✗ "Some taxis (TX) are built to last just like the London buses, they should not be subject to a 14 year rule, because driver's can not recuperate the expense of purchase in that time- a 14 year rule will mean that less of these Iconic taxis are used"
- ✗ "We can't afford new cars, times are hard as too many Wolverhampton drivers in Birmingham "
- ✗ "If it passes the exceptional condition test every year why cant it continue to be licensed and used as a taxi regardless of its age"
- ✓ "I think this policy will help reduce the air pollution in future."
- ✓ "I do agree with this policy as the fleet of taxis are so old. I don't think they are fit for purpose"

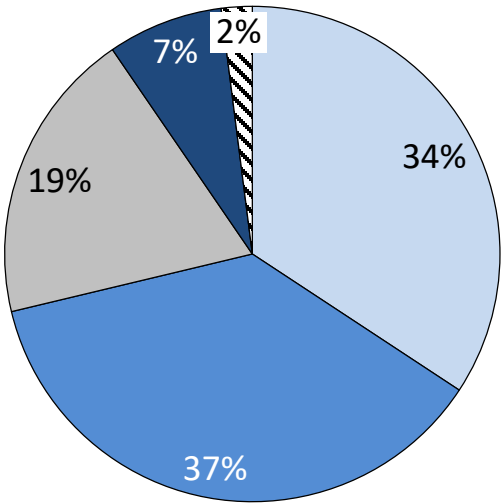
- There were numerous points of contention expressed in the responses. In summary:
 - There was a general question as to why vehicles could no longer be licensed if they had passed an exceptional condition test. This was particularly mentioned in reference to the CAZ emissions conditions with many drivers questioning why a vehicle has to be taken off the road if it passes emissions tests and has been deemed in excellent condition by an independent garage.
 - HC drivers did not feel like 14 years was a sufficient time period to see return on investment from the upfront the vehicle purchase. There were many who stated that being a HC driver within Birmingham would no longer be financially viable under these conditions.
- In contrast those that agreed with the policy mentioned:
 - The current fleet is not fit for purpose, enforcing an age limit ensures that standards of quality will be maintained as vehicles are likely to be of poor quality once they have reached 14 years.
 - Older vehicles are thought of as more polluting and this policy removes them from the road creating health benefits.

1. Do you agree with the proposal to limit the age of hackney carriage vehicles so that they cannot be licensed after the age of 14?

Agree

N= 418 in total, 147 provided comments

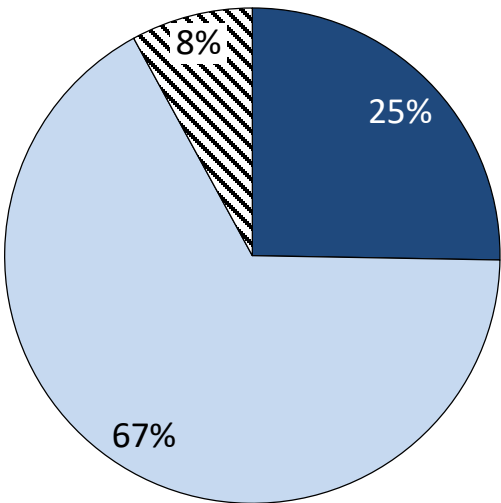
- Current fleet is not fit for purpose
- Vehicles over 14 years of age should not be on the road
- Older vehicles are more poluting so should be taken off the road
- Agree with the principle of an age limit but it should be increased from 14 years
- Other



Disagree

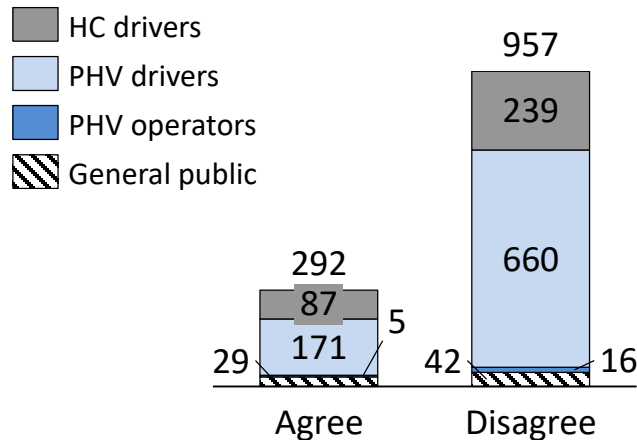
N= 826 in total, 565 provided comments

- If a vehicle is in good condition it should continue to be licenced
- 14 years is not sufficient time to see return on the investment of a new vehicle
- General disagreement or other



2. Do you agree with the implementation date for this proposal of 1 January 2020?

Number of respondents: 1,227









- ✗ "Not enough time given lots of changes happening need more time to reflect on changes and make the correct decision"
- ✗ "how are the drivers able to afford a euro 6 or electric vehicle? And have to make the leap from a tx2 model in such a short time?"
- ✗ "Drivers need more time, It took the council nearly 2 years to make consultations and still we are not sure what is happening?"
- ✗ The notice period is too short. It is unfair for drivers who have invested thousands recently. They should be given at least 3 to 4 years
- ✓ "This should have happened earlier we do need clean taxis in Birmingham."

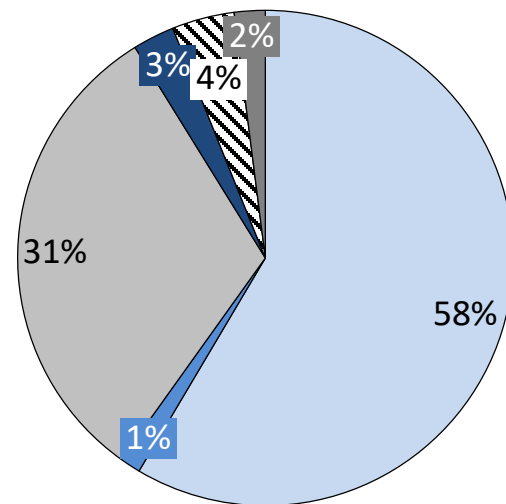
- Response to this policy was overwhelmingly negative and there were two themes that stood out:
 - This is not sufficient time for drivers to adapt to new licence conditions. This is especially true as the CAZ emission requirements have already put the industry under significant pressure. The impact of this has been exaggerated by the poor communication from the council. It was felt that, if this had of been communicated to the driver community earlier then they could have had more time to assess their options. Drivers generally rely on second hand vehicles which will not be available in sufficient volume by 2020
 - The cost of upgrading to a compliant vehicle makes this unfeasible and may drivers stated that they will struggle to continue as a HC driver when this is implemented. There is consensus that the time frame provided is not sufficient to come up with the necessary capital to upgrade vehicle. This is exacerbated by a trade struggling due to the influx of out of town drivers.
- The minority of respondents which did agree with the policy highlighted the critical nature of these changes and the fact that they can not be delayed any further. These respondents generally expressed an opinion that the time frame provided was sufficient for driver to adapt and upgrade their vehicle.

2. Do you agree with the implementation date for this proposal of 1 January 2020?

Agree




N= 295 in total, 75 provided comments

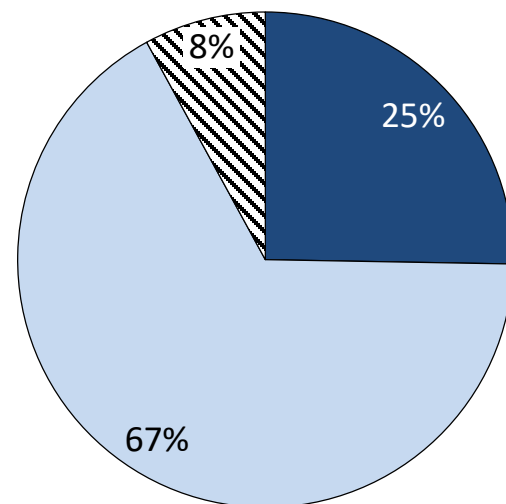
-  The switch to clean vehicles can not be delayed further
-  The driver community is already prepared for the new conditions
-  There is enough time for the driver community to make the necessary changes
-  The driver community will need government support to adapt to these conditions
-  Longer notice is needed to implement this policy
-  Other



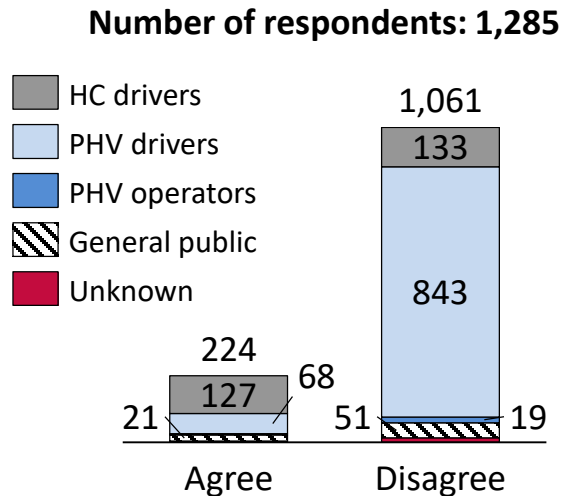
Disagree

N= 973 in total, 586 provided comments

-  There is not enough time for drivers to prepare for this change
-  The costs of adapting to this measure are unrealistic for drivers
-  Other



3. Do you agree with the proposal to limit the age of private hire vehicles so that they cannot be licensed after the age of 8 years?



- ✗ "Exceptional vehicles which meet the condition should be licensed as before, if not age limit should be 14 year's. PHV should not be discriminated by city council by limiting age to 8 years"
- ✗ "Average taxi driver will not buy a new car, so they will have already eaten in to most of the 8 year limit"
- ✗ "It is not fair to impose one set of standard for one type of vehicle then another for another"
- ✗ "Stop the Wolverhampton drivers working in Birmingham and help your drivers instead of forcing them further out of the trade"
- ✓ "Private hire vehicle are not purposely built for taxi service and 8 years is a long service for a normal car"

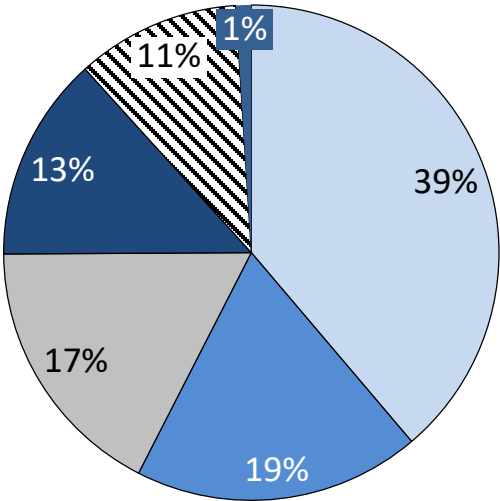
- There was a general disagreement with the principle of applying age limits as a licencing policy. It was felt that:
 - If a vehicle meets the CAZ emission limits then it is not causing public health concerns and therefore should be allowed to stay on the road as a Private Hire Vehicle
 - If a vehicle passes an exceptional condition test as well as an MOT then it should be continued to be licenced.
- It was felt that the cost of upgrading a vehicle will make continuing as a PHV driver unfeasible. Many examples were given, drivers seem to generally purchase cars when they are 3-5 years old. The 8 year age limit means that they must replace their vehicle every 3-5 years. This is seen as unaffordable.
- There was consistent comparison to the Hackney carriage licencing condition allowing vehicles to operate until they are 14 years of age. This was felt to be unfair.
- There were numerous references to policy making Birmingham drivers uncompetitive relative to surrounding councils.
- From the small portion that did agree with the policy, there was consensus that Private Hire Vehicles should not operate beyond 8 years as these are not specialist high mileage vehicles like Hackney Carriages. Therefore, there are concerns that beyond this age the fleet will not be fit for purpose.

3. Do you agree with the proposal to limit the age of private hire vehicles so that they cannot be licensed after the age of 8?

Agree

N= 224 in total, 75 provided comments

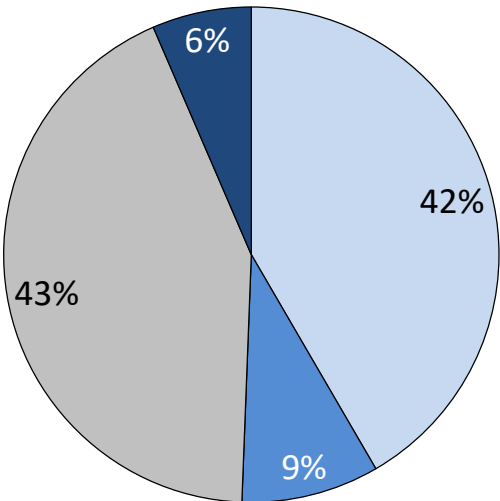
- Private Hire Vehicles should not be on the road after 8 years
- Private Hire Vehicles drivers have a wider range of affordable vehicle choices so should have areduced operating life time
- General agreement or other
- Current fleet is not fit for purpose
- Older vehicles are more polluting and should be removed from the fleet
- Age limit should be reduced to less than 8 years



Disagree

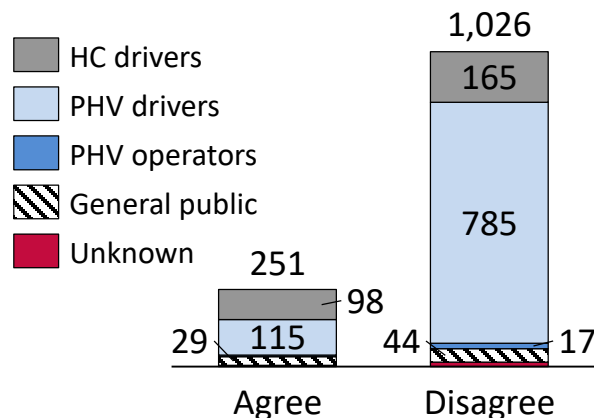
N= 1,061 in total, 787 provided comments

- There are major affordability issues as result of having to regularly upgrade vehicle
- Agreement in principle with an age limit though it should be more than 8 years
- Licence renewal should be based purely on emissions and vehicle condition as opposed to age
- This policy unfairly penalises PHV relative to HC drivers who get a 14 year age limit



4. Do you agree with the implementation date for this proposal of 1 January 2020?

Number of respondents: 1,258









- ✗ "Not enough time, Council have not been clear with this process, so how can you justify telling drivers at this late point.... it is not easy to save up for a new car"
- ✗ "With finance to pay for three or four years, how are you going to buy another car until he going to clear debt finance?"
- ✗ cap the amount of drivers allowed and stop cross border driving
- ✓ "private hire drivers will be able to upgrade their vehicle if needed in this time"
- ✓ "It will make Birmingham Licensed the nicest and cleanest looking private hire vehicles in the country"

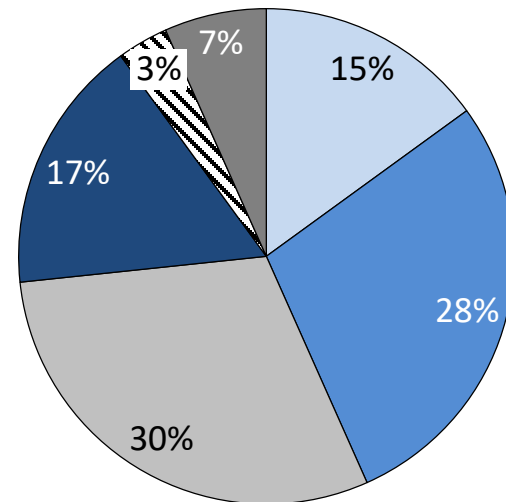
- There was an overriding feeling that this does not provide sufficient time to adapt to the new age limit:
 - Many drivers have already purchased vehicles to comply with the new emissions standards, this age limit means they will have to upgrade again soon after 2020.
 - Drivers do not feel that the council communicated this well meaning many are stuck in finance agreements with vehicles that will no longer be eligible.
 - The time frame is not adequate to save the capital to upgrade vehicle.
- The costs involved in vehicle upgrade mean many drivers will not be able to adapt in time and so will be forced out of the trade.
- Again, numerous reference to out of town drivers putting financial pressure on drivers.
- Those that did agree with the policy mentioned;
 - The need to cut emissions meaning older vehicles need to be removed from the fleet at the earliest opportunity.
 - The timeframe provided should be adequate to upgrade a PHV as they are more affordable and have a wider vehicle choice relative to HC drivers.
 - This policy needs to be enacted as soon as possible as the current fleet is not fit for purpose.

4. Do you agree with the implementation date for this proposal of 1 January 2020?

Agree




N= 251 in total, 62 provided comments

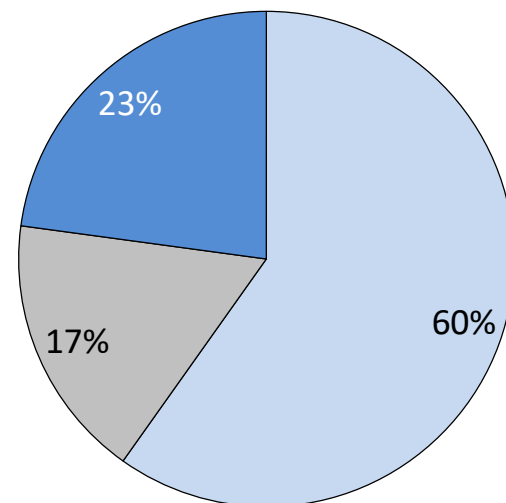
-  Emissions within Birmingham need to be reduced as a matter of urgency
-  This gives drivers sufficient time to adapt
-  General agreement or other
-  This policy needs to be implemented as soon as possible
-  This policy needs to be enacted so that Birmingham is consistent with the rest of the UK
-  PHVs are generally more affordable than Hackney carriages so drivers should be able to adapt in time.



Disagree

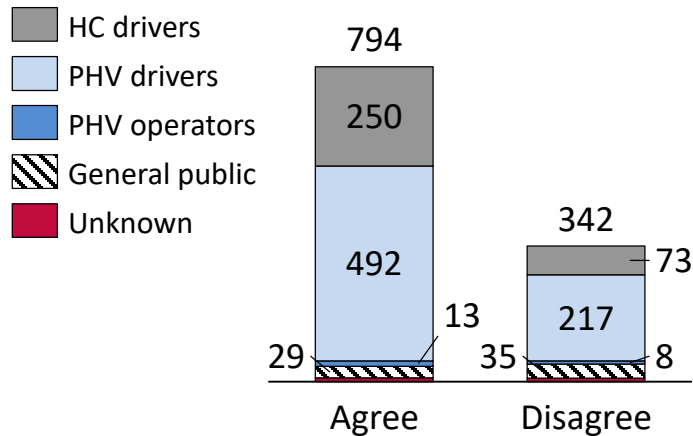
N= 1,026 in total, 566 provided comments

-  This does not leave enough time for drivers to adapt to the policy.
-  General disagreement with the policy
-  The cost of upgrading vehicles means that this timeframe is not sufficient.



5. Do you agree that we should extend the life of Hackney carriages with approved CVRAS retrofit technology until 31 December 2025?

Number of respondents: 1,136












- ✓ "This will give us time to decide about our future in taxi trade"
- ✓ "The prohibitive cost of new electric and Euro 6 vehicles mean retrofit approved technology is a must."
- ✓ "Alternative options should equally be available for other models and I am aware that there are options for alternative models that could be explored further"
- ✗ This should be the same for private hire
- ✗ "20 year old vehicles seems like a backwards step in terms of improving the standard of taxis in Birmingham."

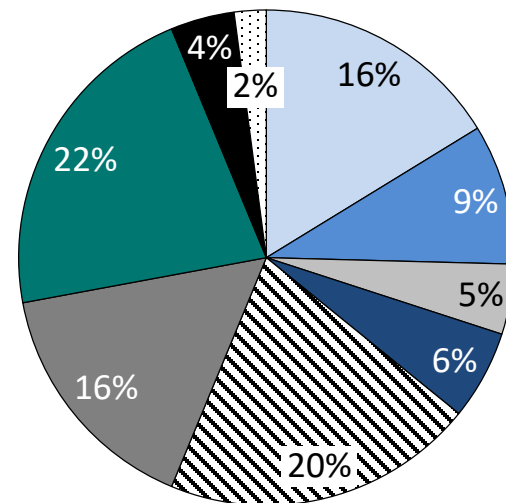
- The response was generally positive, especially from HC drivers. Most commented that a retrofit solution is seen as the only affordable option open to taxi drivers. The 5 year extension allows more time for drivers to save capital for a new vehicle and also consider the future of the taxi trade.
- Although there was general agreement there were concerns expressed:
 - Needs to be available to all HCs regardless of age and model.
 - Technology options needs to be expanded so drivers can organise the installation themselves on the open market.
 - The timeframe is not long enough and should be extended to 2030.
 - The measure should be extended to PHVs as they are currently be discriminated against vis there exclusion from this option.
 - There needs to be financial support to drivers, they should not be expected to cover the full cost of the technology.
- Of those that disagreed with the policy completely, many mentioned the unreliability of the technology as well as stating the taxis over the 14 year age limit should not be permitted to be on the road.

5. Do you agree that we should extend the life of hackney carriages with approved CVRAS retrofit technology until 31 December 2025?

Agree









-  This gives more time to drivers to adapt to the licence conditions and consider the future taxi market
-  This policy needs to be extended to all HC so not to discriminate against those with older non-eligible vehicles
-  This policy needs to be extended to 2030
-  The policy needs to be expanded to include other technology so drivers can go to the market themselves and install it.
-  This is a way by which drivers will be able to stay in business
-  This is a good policy to ensure that emissions are reduced and standards of quality remain high
-  General agreement with the policy
-  This policy should be extended to PHVs
-  The council should provide grants to pay for the installation

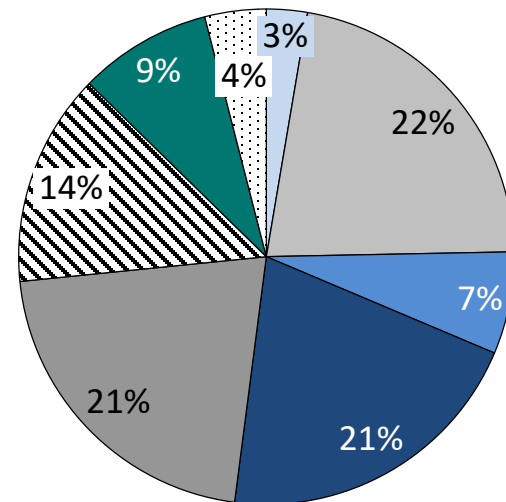
N= 794, n total, 241 provided comments



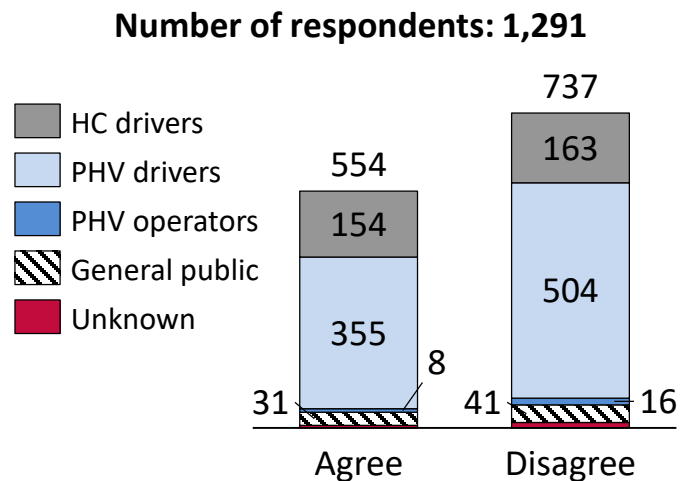
Disagree

N= 342 in total, 149 provided comments

-  Higher emissions than other technologies
-  Vehicles should not be allowed to operate beyond their age limit
-  The cost of the technology is too high
-  This policy should be extended beyond 2025
-  This policy should be extended to Private Hire Vehicles.
-  General Disagreement or other
-  The retrofit technology offered is not fit for purpose
-  This should be available to all Hackney carriages regardless of age or model



6. 2026 ULEV stock condition: Do you agree that Birmingham should adopt this policy in order to improve air quality in the city?



- ✓ "It may be better for the environment in the long term"
- ✓ "should not use taxi drivers as a scapegoat when other sectors give off much more emissions."
- ✓ "Alternative options should equally be available for other models and I am aware that there are options for alternative models that could be explored further"
- ✗ "If I were to get a brand new car in 2020 then in 2026 I would need raise more money to get ULEV."
- ✗ "There are currently no alternatives to the Euro 6 diesel apart from the LEVC vehicle Not affordable"
- ✗ "There are far more out of town drivers then Birmingham drivers"

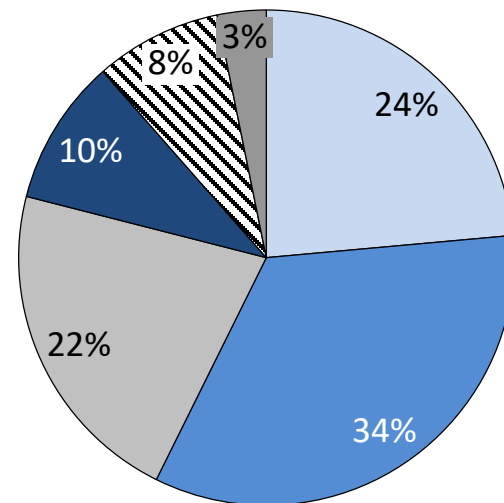
- There was a general consensus that emissions needed to be reduced. Those that agreed with the policy described it as a good balance between cutting emissions and helping drivers adapt to the new conditions. However, this group was in the minority with many respondents stating that although reductions are important, this was not the correct way to achieve it.
 - Drivers felt that taxis only contribute to a small proportion of total emissions but are hardest hit by the CAZ measures. They expressed a desire for the burden to be shared more equally between other emitters (e.g. trains, private vehicle drivers etc.).
 - Considering this there were requests for new licence condition to be delayed to give adequate time for drivers to prepare
- There was generally a negative response to the 2026 ULEV stock condition:
 - They felt this was very unfair to expect drivers to upgrade now and then again before 2026.
 - It was not felt that there is sufficient choice on the market for ULEV taxis and charging infrastructure within the city is not adequate.
- There was also frequent reference to drivers from other Councils making operating a taxi in Birmingham financially very difficult.

6. 2026 ULEV stock condition: Do you agree that Birmingham should adopt this policy in order to improve air quality in the city?

Agree

N= 554 in total, 159 provided comments

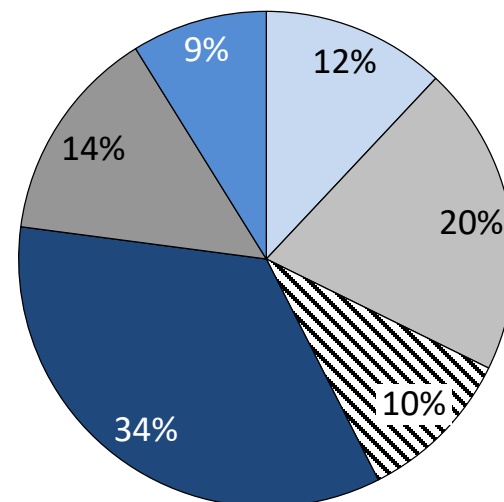
- General agreement or other
- This policy will help reduce emissions within the city
- Agreement with the policy, but funding support should be provided by the council.
- Agreement that Air Quality needs to be improved, but the timescales of implementation needs to be extended
- Agreement that Air Quality needs to be improved, but think drivers are being unfairly targeted when there are other larger source of pollution.
- This is a good policy to ensure that emissions are reduced and standards of quality remain high



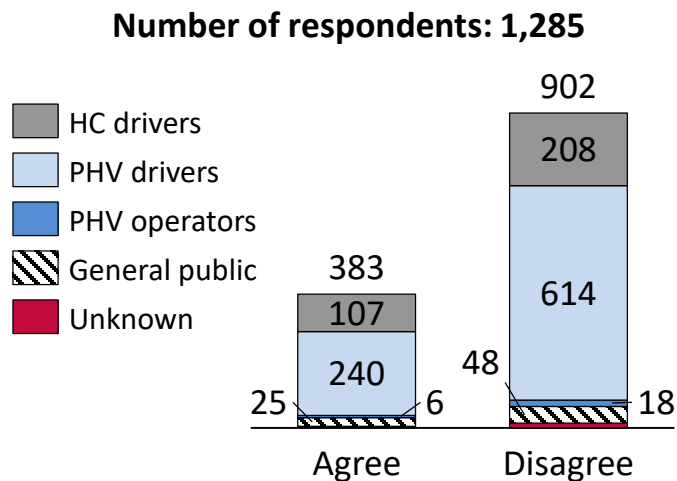
Disagree

N= 737 in total, 352 provided comments

- Drivers need longer to adapt to these measures
- Taxis only contribute a small proportion of total emissions, other sources can be targeted with a lesser negative financial impact on the community.
- General disagreement
- Drivers cannot afford to upgrade vehicle in this timeframe
- Disagreement with the ULEV stock condition in 2026. ULEVs are too expensive and there is not a large enough vehicle choice.
- The retrofit technology offered is not fit for purpose



7. 2026 ULEV stock condition: Do you agree with the date that we have suggested for the implementation of this policy?



- ✗ "euro 6 compliant taxis should be allowed to continue until 2030"
- ✗ "electric taxi is not proven. In winter it's giving you less than 50 miles on battery."
- ✗ "Age limiting with such a short notice....is a joke"
- ✗ "Financial impacts will make this date unreasonable."
- ✗ "Where are the charging points? Birmingham has no infrastructure in place"
- ✗ "The range of vehicles currently being produced are unreliable and until there is a vast improvementdate specified is far too early"
- ✓ "2026 is more than enough time for the drivers to make plans to adjust to the policy".
- ✓ "Clean environment, healthy living"

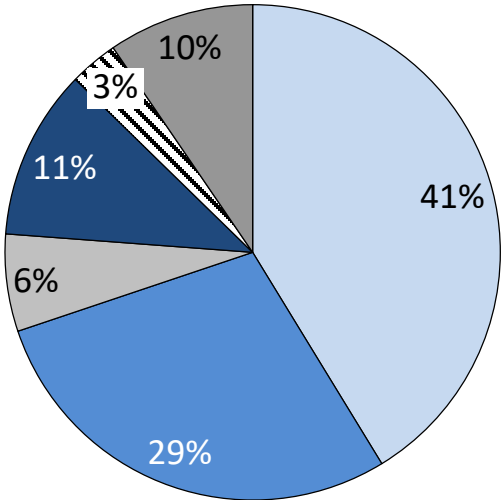
- The majority of respondents disagreed with this policy and there were common themes that appeared in numerous comments:
 - The date is too early and does not provide the driver community with enough time to adapt financially.
 - This date would mean that any Euro 6 purchased in 2020 would not be operated for its full life of 14 years. There can be no return on investment in such a short timeframe.
 - The costs involved in upgrading to a ULEV mean this move is not feasible. If drivers were forced to upgrade, significant government support would be required to prevent a large number of drivers going out of business.
 - The choice of vehicles is not expected to improve and drivers are limited in their choice.
 - There is little confidence in the technical readiness of ULEV taxis to perform the day to day duty cycle and a general concern over the lack of charging infrastructure in Birmingham.
- The minority of respondents who did support the policy cited:
 - The length of time being sufficient for drivers to adapt.
 - The resulting emission reductions.
 - The need to switch to ULEVs in as short a timeframe as possible.

7. 2026 ULEV stock condition: Do you agree with the date that we have suggested for the implementation of this policy?

Agree

N=383 in total, 63 provided comments

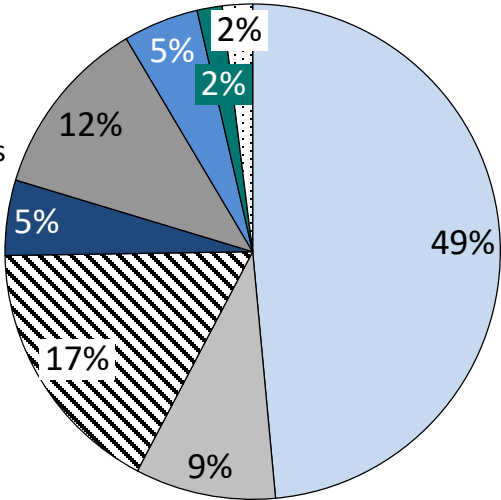
- The timeframe proposed is sufficient for drivers to organise an upgrade for their vehicle
- General agreement or other
- This policy will reduce harmful emissions and make the city's air cleaner
- The policy should be enacted as soon as possible
- Agreement with the policy timeframe but drivers must be supported to help adapt to the new conditions
- The timeframe should be extended to give drivers more time to adapt



Disagree

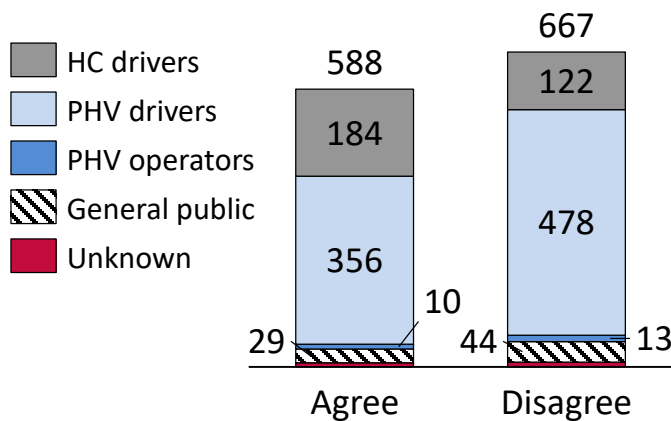
N= 902 in total, 305 provided comments

- The proposed implementation date is too early and does not give driver sufficient time to adapt to the new conditions
- Any vehicle bought new should be allowed to operate for a full life cycle, this policy contradicts this
- General or other
- If this is to be implemented, drivers will need significant financial support
- The cost of ULEVs make this timeframe unfeasible
- There is not sufficient vehicle choice. This combined with the uncertainty over technology and lack of public charging infrastructure make the implementation date unrealistic
- The process should be delayed until the market offering of vehicles becomes more clear
- The date should be brought forward



8. 2030 ZEV condition: Do you agree that Birmingham should adopt this policy in order to improve air quality in the city?

Number of respondents: 1,255



- ✗ "No infrastructure available for these vehicles and they cannot be used as taxis because they are only capable of doing 70 miles"
- ✗ "I think this should come into place at 2035 "
- ✗ "If a driver can't afford the new car he is effectively out of a job."
- ✗ "Long distance driving would not be practical"
- ✗ "Discriminatory action, penalizing one section of Birmingham's workforce"
- ✓ "Agree because it gives sufficient notice to drivers".
- ✓ Yes, only make the changes in 2030 and give drivers 10 years to adapt no changes until then."
- ✓ "Yes fully agree for the sake of environment"

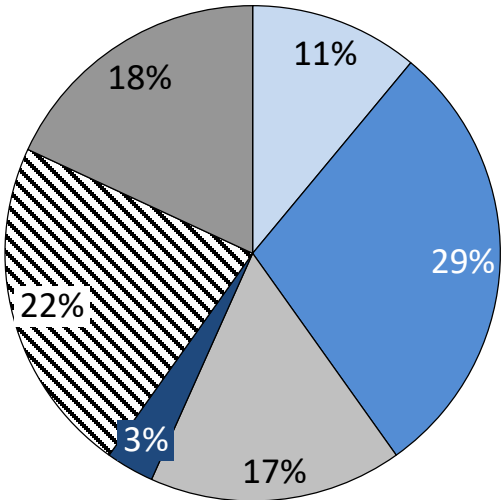
- In comparison to other policy proposals, this was more favourable received. This was in recognition that by 2030:
 - There will be a wider range of electric vehicles on the market.
 - The technology will have improved and be more suitable to day to day usage.
 - Large emission reductions must have been achieved.
 - Drivers will have had sufficient notice to prepare for a vehicle upgrade.
- There was emphasis that this policy should replace completely the condition requiring all vehicles to be ULEV by 2026.
- Despite this, the majority of the respondents still disagreed with the policy stating:
 - Concerns over the technology being suitable for the duty cycle of a taxi (range, lack of charging infrastructure etc.)
 - The limited effectiveness of such a policy compared to other emissions reducing policy options. Especially if similar standards are not enforced by neighbouring councils
 - The high cost and limited vehicle choice involved with upgrading to an electric vehicle with no financial support.
 - The time period not being sufficient

8. 2030 ZEV condition: Do you agree that Birmingham should adopt this policy in order to improve air quality in the city?

Agree

N=588 in total, 138 provided comments

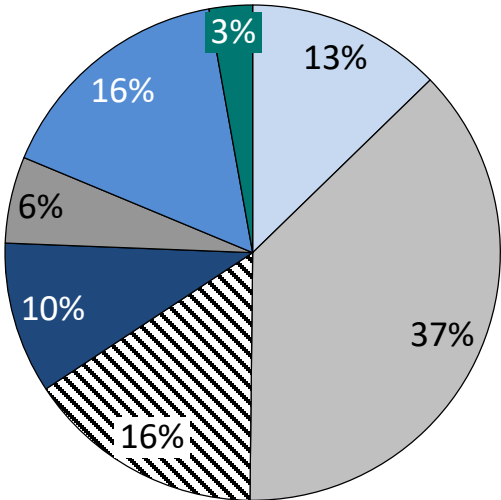
- By 2030 there will be a wide range of vehicles on the market
- Emissions need to be reduced
- Drivers have sufficient notice to prepare for this condition
- This condition should only be enacted if the 2026 ULEV stock condition is removed
- General or other
- The taxi community will need financial support to adapt to this condition



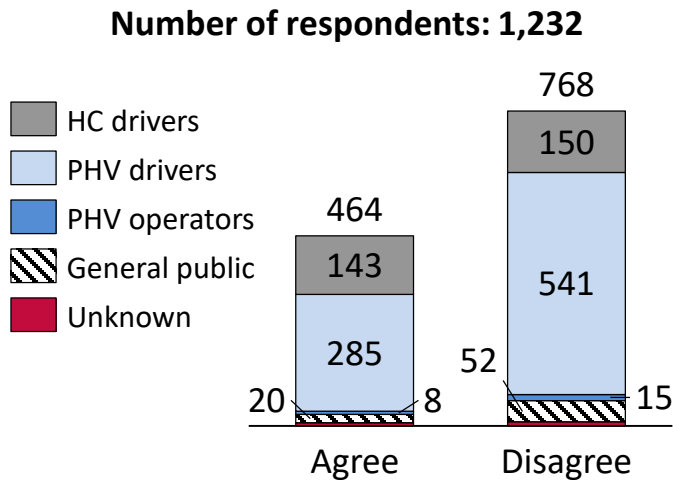
Disagree

N= 667 in total, 283 provided comments

- Electric vehicles are unsuitable to the duty cycle of a taxi, particularly and charging options for those without off-street parking
- The cost of electric vehicles makes upgrading unaffordable
- The taxi community is being unfairly discriminated against when there are other larger sources of emissions
- There is not a large enough range of electric vehicles options
- The timeframe proposed is too short, drivers need longer to adapt
- General or other
- Drivers will need financial support to upgrade to electric vehicles



9. 2030 ZEV stock condition: Do you agree with the date that we have suggested for the implementation of this policy?



- ✗ "It doesn't solve the problems of drivers, there should just be only age limit."
- ✗ "Electric vehicle technology may not be widely developed by date."
- ✗ "decision should be made nearer the time or it should be reviewed in 2025"
- ✗ "not viable because you need to understand the costs are not suitable on a driver's salary"
- ✓ "It's 11 years away and I'm assuming that by then electric cars will be more readily available and more common to buy. Therefore reducing purchase prices".
- ✓ "Sooner would be better."
- ✓ "providing there are viable and economical vehicles available..."

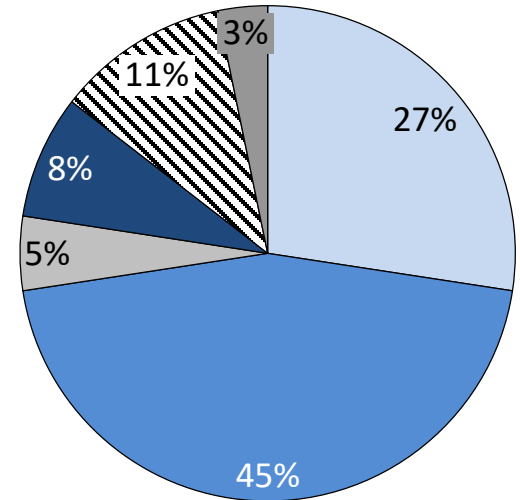
- Those respondents that did agree with this policy generally focused on:
 - The 2030 date meaning that drivers had a 10 year period after the CAZ charges being introduced. This was seen as ample time to prepare.
 - The advancements in electric vehicle technology which are expected by 2030.
- Again the majority of respondents disagreed with the policy. There did seem to be misunderstanding of the policy, with many thinking that it applied to the vehicle stock as a whole rather than just newly registered vehicles. Other objections included:
 - The 2030 date is too early to enforce a switch to electric vehicles. There was a belief stated that the technology will not be sufficient by then to make electric vehicles a feasible vehicle choice, especially considering the very high capital cost involved in purchasing electric vehicles. This was made worse by an uncertain provision of infrastructure within Birmingham.
 - A feeling that this was not an effective solution to air quality issues. Particularly that hybrid or Euro 6 vehicles presented an environmentally friendly option. By enforcing stricter regulations, drivers are being unfairly discriminated against.
 - A need for further consultation on this measure.

9. 2030 ZEV stock condition: Do you agree with the date that we have suggested for the implementation of this policy?

Agree

N=464 in total, 69 provided comments

- General or other
- There is sufficient time for drivers to prepare to upgrade their vehicle
- Drivers will need financial support to adapt to this measure
- This should happen as soon as possible
- By 2030, technology improvements mean electric vehicles will be viable choice for drivers
- Air quality needs to be improved significantly by 2030



Disagree

N= 768 in total, 195 provided comments

- This measure is only viable if all other prior conditions are removed
- The implementation date is too early and does not give drivers sufficient time to prepare
- Other measures will be more effective in reducing emissions and the taxi community is being unfairly discriminated against
- Electric vehicles will not be able to fulfil the day to day requirements of taxis
- This measure requires further consultation and any decision should be delayed until more information is available
- Drivers will need significant financial support to adapt to this measure in the proposed timeframe
- The cost of vehicles make this timeframe unrealistic
- This should be implemented before 2030

