

From: RTA
Sent: 02 October 2024 14:32
To: Masson, Clyde
Cc: Abell, Rob
Subject: Hackney Carriage Emissions & Age Policy Consultation

Warning!
For the attention of
RBC, BfC Staff and Councillors

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Dear Clyde,

I am writing on behalf of our members to express our serious concerns regarding the ongoing changes to the Hackney Carriage Vehicle Emission and Age Policy.

Since 2011, numerous adjustments have been made to this policy. However, there have been no equivalent changes for private hire or school transport vehicles. This discrepancy is unfair, and it seems that the focus of these policies is disproportionately directed towards the Hackney Carriage trade. Our members feel that by not addressing private hire and school transport vehicles under the same policy, the Hackney Carriage trade is being unjustly targeted. The current approach implies that emissions problems in Reading are solely due to the Hackney Carriage trade, which is incorrect. Hackney Carriages represent a smaller number of vehicles compared to private hire and school transport fleets.

We also strongly object to the proposed changes to the Hackney Carriage policy, particularly reducing the new to fleet age limit from 8 to 5 years. These changes would make it more difficult for us to comply, even though the existing policy already ensures the replacement of diesel vehicles with Ultra-Low Emission Vehicles (ULEV). The new proposals would impose high costs on the trade, which could have a detrimental impact on many of our members.

In light of the Licensing Committee Chairman's direction at the meeting on 11 July 2024, we propose the following:

- **Alignment with Department for Transport (DfT) Guidance**:** The latest guidance to local authorities suggests that policies should focus on emissions rather than age limits. We believe this should be adopted in Reading as well.
- **Euro 6 Diesel Vehicles**:** We propose an age policy of 15 years for Euro 6 diesel vehicles, similar to London. These vehicles are exempt from ULEZ and CAZ charges, so it is unclear why they would not be acceptable in Reading.
- **ULEV Licensing**:** The available ULEV vehicles have not changed since their introduction. Therefore, whether a ULEV vehicle is 5, 8, or even 10 years old, it should be licensed as long as it meets emissions standards. Any vehicle over 8 years old could be inspected by the Licensing Enforcement Office to ensure it is in good condition.
- **Increase in Maximum Age Limit**:** We propose raising the maximum age limit for ULEV vehicles from 15 to 20 years, provided they remain in good condition. This would bring the policy in line with fully electric vehicle standards.

We believe that these changes would create a fair and balanced policy for the Hackney Carriage trade. Unlike the private hire and school transport trade, which have more vehicle choices, we rely on a single ULEV vehicle, the LEVC model currently priced at £72,500. When interest payments are taken into account, this cost is closer to £100,000.

While we fully support the phasing out of diesel vehicles, the policy should focus on encouraging and assisting the trade to transition to a greener, cleaner fleet rather than pushing us out of business. We urge the Council to consider our proposals to create a fairer policy that is more aligned with industry standards and that supports our members in making sustainable changes.

We look forward a constructive dialogue on these important issues and having a policy that benefits all.

Kind regards,

Asif