

READING BOROUGH COUNCIL

REPORT BY DIRECTOR FOR ECONOMIC DEVELOPMENT AND NEIGHBOURHOODS

TO:	STRATEGIC ENVIRONMENT, PLANNING & TRANSPORT COMMITTEE		
DATE:	20 NOVEMBER 2019	AGENDA ITEM:	10
TITLE:	HACKNEY CARRIAGE VEHICLE EMISSIONS & AGE POLICY		
LEAD COUNCILLOR:	CLLR TONY PAGE	PORTFOLIO:	STRATEGIC ENVIRONMENT, PLANNING & TRANSPORT
SERVICE:	PLANNING, TRANSPORT & REGULATORY SERVICES	WARDS:	BOROUGHWIDE
LEAD OFFICER:	LISA RICHARDS	TEL:	0118 937 2257
JOB TITLE:	LICENSING, FOOD & SAFETY MANAGER	E-MAIL:	Lisa.richards@reading.gov.uk

1. PURPOSE OF REPORT AND EXECUTIVE SUMMARY

- 1.1 The aim of this report is to note the attached Hackney Carriage Vehicle (HCV) emissions & Age Policy, which sets out the Council's requirements until 2030. The report is detailed in full in Appendix 1 and was agreed at Licensing Applications Committee on 23rd October 2019.
- 1.2 The proposed policy is a staged approach with the aim of removing older and more polluting vehicles whose exhaust fumes are harmful to health and detrimental to the environment. The policy was designed in consultation with the Reading Taxi Association (RTA) and the Reading Cab Drivers Association (RCDA) following the declaration of the Climate Change Emergency.
- 1.3 In order to support the introduction of electric vehicles onto the fleet, the Council has recently put in a bid for Government funding which would enhance electric charging infrastructure as well as delivering a number of electric vehicles which would raise awareness and confidence in using the vehicles.

2. RECOMMENDED ACTION

- 2.1 That the Committee note the attached report which sets out a new Hackney Carriage Emissions and Age Policy which aims to deliver an Ultra-Low Emission or Electric Vehicle fleet by 2028.

Appendix 1

READING BOROUGH COUNCIL

REPORT BY DIRECTOR FOR ECONOMIC DEVELOPMENT AND NEIGHBOURHOODS

TO:	LICENSING APPLICATIONS COMMITTEE		
DATE:	23 OCTOBER 2019	AGENDA ITEM:	5
TITLE:	HACKNEY CARRIAGE VEHICLE EMISSIONS & AGE POLICY		
LEAD COUNCILLOR:	CLLR TONY PAGE	PORTFOLIO:	STRATEGIC ENVIRONMENT, PLANNING & TRANSPORT
SERVICE:	PLANNING, TRANSPORT & REGULATORY SERVICES	WARDS:	BOROUGHWIDE
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1. PURPOSE OF REPORT AND EXECUTIVE SUMMARY

1.1 The aim of this report is to adopt a Hackney Carriage Vehicle (HCV) emissions & age policy setting out the Council's requirements until 2030. This will complement the existing Local Transport Plan (LTP) and feed into the new LTP when adopted.

1.2 The purpose of bringing this report now rather than waiting until the LTP version 4 has been adopted is to give HCV owners as much time as possible to prepare for the changes required in order to contribute to the Council's carbon neutral strategy by 2030.

1.3 The proposed policy is a staged approach with the aim of removing older and more polluting vehicles whose exhaust fumes are harmful to health and detrimental to the environment. It has been formulated in consultation with the Reading Taxi Association (RTA) and the Reading Cab Drivers Association (RCDA) following the declaration of the Climate Change Emergency.

1.4 The three staged process is as follows:

- (i) To remove vehicles of European Exhaust Emissions Standard Euro 3, 4 and 5a leaving Euro 5b and Euro 6b or cleaner vehicles by 2024. This will reduce particulate matter and Nitrogen Oxide in the air which is harmful to health. This is in line with the Council's Air Quality Action Plan.
- (ii) To encourage the take up of Ultra Low Emission Vehicles (ULEV) and 100% electric vehicle by providing a free licence for the first year of a brand new and first time new to fleet vehicle. Thereafter a ULEV /100% electric vehicle will be charged at a lower annual fee.
- (iii) From 2025 to favour Ultra Low Emission Vehicles (ULEV) over Euro 5b and 6b vehicles. The reduction in vehicles that use petrol or diesel engines will reduce the amount of CO₂ in the air which will contribute to the Council's strategy of being carbon neutral by 2030. The LTP4 will provide reference to a charging network.

1.5 If this report is agreed by the licence committee it will be forwarded to Strategic Environment Planning and Transport committee in November 2019 for information.

2. RECOMMENDED ACTION

2.1 That committee adopt the emissions & age policy for HCVs until 2030 which is set out as follows:

Date	Proposed Standard
23 Oct 2019	Vehicle Age policy 15 years for all vehicles, 100% electric 20 year Vehicle Age Policy
23 Oct 2019	All Replacement vehicles will be a min of Euro 5b and less than 8 years old. This rule will apply regardless of whether the vehicle is new to fleet or an existing vehicle.
1 Oct 2021	Vehicle Age Policy 14 years for vehicles up to and including Euro 5a (vehicles aged over 1/10/07 only)
1 Oct 2022	Vehicle Age Policy 13 years for vehicles up to and including Euro 5a (vehicles aged over 1/10/09 only)
1 Oct 2023	Vehicle Age Policy 12 years for vehicles up to and including Euro 5a (vehicles aged over 1/10/11 only)
1 Oct 2025	All Replacement vehicles are minimum ULEV and less than 8 years old. This rule will apply regardless of whether the vehicle is new to fleet or an existing vehicle.
1 Oct 2028	All vehicles to be minimum ULEV

Date	Incentives
Currently	All 100% electric vehicles pay 41% of the standard vehicle fee.
From 1 April 2020	All ULEV (CO ₂ <50g/km emissions) pay a 25% reduction in the annual standard vehicle fee. 100% electric vehicles will receive a 50% reduction in the annual standard vehicle fee.
1 Oct 2021 -1 Oct 2022	Any ULEV/100% electric vehicle that has never been on the fleet before receives a free licence for its first year on the fleet.

- 2.2 The committee agree a definition of an Ultra Low Emission Vehicle (ULEV) as a vehicle emitting a maximum of 50g/km of CO₂ from the tailpipe as detailed in the DVLA vehicle specification. This brings forward the national standard definition which is due to come into force from 2021.**
- 2.3 That committee agree that the HCV emissions & age policy will compliment LTP4, which will acknowledge the greater electric charging infrastructure required to achieve the air quality standards and carbon neutral strategy by 2030.**
- 2.4 A further report will be brought to full Licensing Committee in Autumn 2020 to review the vehicle fees and charges for Hackney Carriages to ensure that any incentives given above are maintained within the current advances of technology and within the overall budget.**
- 2.5 Where Government grant money or incentives become available in the future, the Council may bring about a revision of the policy to accelerate the move to zero emissions.**

3. POLICY CONTEXT

- 3.1 In the UK, road transport is now the largest source of carbon dioxide (CO₂) pollution. In July 2018, the government set-out its 'Our road to Zero' strategy to meet both short and longer term reductions in CO₂ and air quality emissions including ending the sale of conventional petrol and diesel vehicles by 2040. See reference footnote no. 11.1
- 3.2 The emissions strategy is more complex than just the reduction of CO₂ and involves the reduction of nitrogen oxide (NO_x) and particulate matter namely particulate matter of size 0.01 mm (PM₁₀) and particulate matter of size of 0.0025 mmm (PM_{2.5}). Both NO_x and particulate matter are found in diesel fuel. Particulate matter is also associated with tyre, brake and road wear.
- 3.3 The European Exhaust Emissions Standard (known as the "Euro" standard) was introduced in the 1970s. Limits on CO₂, NO_x and particulate matter emissions form part of these standards. The introduction of each new Euro level brings about a reduction in carbon, hydrocarbon emissions, NO_x and particulate matter from the engines.
- 3.4 The most significant reduction in emissions is with the latest Euro 6 engine.
- 3.5 Significant further reduction in carbon emissions can be achieved by converting to ULEV. An ULEV as defined by the Vehicle Certification Agency is currently a vehicle that emits less than 75 g/km of CO₂ from the tailpipe. The definition of ULEV will be reduced to 50g/km of CO₂ from the tailpipe from 2021. These vehicles will be either 100% electric or a hybrid model which uses electric in conjunction with either a diesel or petrol engine.
- 3.6 Reading Borough Council declared a 'Climate Emergency' and set an objective to be carbon neutral by 2030 at its Strategic Environment Planning and Transport (SEPT) Committee on 18 March 2019 following a motion to Full Council on the 26th February 2019. In order to achieve this, consideration will need to be given to ensure that forthcoming revisions to the Local Transport Plan and Climate Change Strategy (and any other relevant policy statements) reflect the urgency of this resolution.
- 3.7 The Office for Low Emission Vehicles (OLEV) has made grant available to dealerships specifically for taxis via a 'plug in taxi grant'. The dealerships can claim between £3000 and £7500 depending on the vehicle type. This amount is deducted from the price of a new vehicle at the dealership so there is no paperwork to complete by the customer. For instance the Dynamo Moto Company taxi which is 100% electric has a range of 174 miles and a price of £52,995 Inc VAT less £7,500 Government grants leaving £45,495 to pay. The London Electric Vehicle Company which has lower emission than a standard taxi but is not 100% electric and is likely be awarded a lower grant of £3000 grant at the dealership.
- 3.8 The Department for Transport (DfT) plans to reduce the annual vehicle road tax for ULEV vehicles to between £0 - £145 depending on if the vehicle is 100% electric or if there is a fuel powered range extender on the vehicle.
- 3.9 The Council currently charges a reduced fee of £145 per year to licence a 100% electric vehicle compared to £346 (not including unmet demand fee) for a 100% petrol/diesel vehicle. There has been no take up of this offer to date in the hackney carriage fleet but there is 1 private hire vehicle.
- 3.10 The Air Quality (Taxis and Private Hire Vehicles Database) (England and Wales) Regulations 2019 makes provision of information relating to taxis and private hire vehicles a requirement in order to secure air quality compliance. Licensing Authorities in England and Wales will be required to upload weekly details from October 2019 of the vehicles licensed by the Council to a central database held by Department of Environment Farming

and Rural Affairs (DEFRA). The DEFRA database will contribute to local air quality action plans and Clean Air zones.

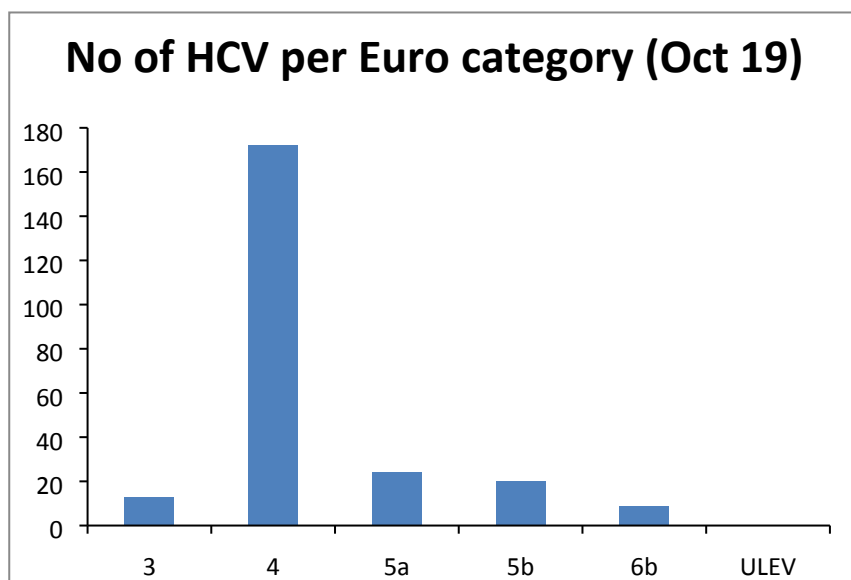
4.0 THE PROPOSAL

4.1 Current Position:

4.1.1 At September 2011 Licensing Committee it was resolved that from 1 October 2013 all Hackney Carriage Vehicles must have an engine which is Euro 3 compliant or better or have been retrofitted with an emission abatement system to achieve Euro 3 standard or higher.

4.1.2 In November 2016 the Licensing Committee resolved to change the emissions policy to an age policy and resolved that a 15 year age policy for all HCVs be introduced from 1st October 2018. Any new to fleet vehicles would be a maximum of 8 years old.

4.1.3 The following graph details the Euro Emission Standard and the number of vehicles currently licensed by the Council at October 2019. The vehicle age and vehicle emission produced at each Euro standard is provided in Appendix 1.



4.1.4 The current 15 year age policy means that Euro 4 vehicles will start to be removed from the fleet in a graduated manner from January 2021 but all of the Euro 4 vehicles will not be removed from the fleet until August 2026. Furthermore, Euro 5b and Euro 6b vehicles will not come off the fleet until after the 2030 deadline.

4.1.5 There are no ULEV HCVs on the fleet including LPG, electric or hybrid vehicles.

4.2 Option Proposed

4.2.1 The Council proposes the introduction of a new emissions policy that has been agreed by the RTA (see Appendix 2) and sets out a staged approach to remove the older and more polluting vehicles and to actively encourage the take up of ULEV vehicles by 2030. This is detailed in the table below.

Date	Proposed Standard	Vehicles Removed
23 Oct 2019	Vehicle Age policy 15 years for all vehicles, 100% electric 20 year age policy	
23 Oct 2019	All Replacement vehicles will be a min of Euro 5b and less than 8 years old. This rule will apply	

	regardless of whether the vehicle is new to fleet or an existing vehicle.	
1 Oct 2020	15 year Vehicle Age policy	8 Euro 3
30 Sept 2021	15 year Vehicle Age policy	20 Euro 3/ Euro 4
1 Oct 2021	Vehicle Age Policy 14 years for vehicles up to and including Euro 5a (vehicles aged over 1/10/07 only)	51 vehicles -all Euro 4 (1/10/06-30/9/07)
1 Oct 2022	Vehicle Age Policy 13 years for vehicles up to and including Euro 5a (vehicles aged over 1/10/09 only)	77 all Euro 4 (1/10/07-30/9/09)
1 Oct 2023	Vehicle Age Policy 12 years for vehicles up to and including Euro 5a (vehicles aged over 1/10/11 only)	32 Euro 4 / 5a (1/10/09-30/9/11)
28 Dec 2024	Vehicle Age Policy 12 years ends	9 Euro 5a
1 Oct 2025	All Replacement vehicles are minimum ULEV and less than 8 years old. This rule will apply regardless of whether the vehicle is new to fleet or an existing vehicle.	
1 Oct 2028	All vehicles to be minimum ULEV	

4.2.2 The Council will implement the following incentives to HCV owners in order to encourage the take up of the ULEV. The annual standard vehicle fee is to be determined each year. Any incentives given below will be regularly reviewed to determine whether they are within budget and reflect the advances in technology.

Date	Incentives
Currently	All 100% electric vehicles pay 41% of the standard vehicle fee.
From 1 April 2020	All ULEV (CO ₂ <50g/km emissions) pay a 25% reduction in the annual standard vehicle fee. 100% electric vehicles will receive a 50% reduction in the annual standard vehicle fee.
1 Oct 2021 -1 Oct 2022	Any ULEV/100% electric vehicle that has never been on the fleet before receives a free licence for its first year on the fleet.

4.3 Other Options Considered

4.3.1 The Council have proposed a change back to an Euro emissions standard policy which will remove more polluting vehicles quickly.

Date	Proposed Standard	Vehicles to be removed
1 April 2020	Minimum of Euro 4	Euro 3 and older
1 Oct 2021	Minimum of Euro 5	Euro 4
1 Oct 2022	Minimum of Euro 6	Euro 5a and 5b
1 Oct 2026	All new vehicles are ULEV	
1 Oct 2029	All vehicles to be ULEV	Euro 6
1 Oct 2026	Any vehicle with petrol/diesel element to their engine will have a max age policy of 12 years and 8 years at brand new to fleet	

4.3.2 The RTA sent a representation on 30th September 2019 as follows. See also Appendix 2:

Date	Proposed Standard	Vehicles to be removed
Age limit of 15 years for all Euro 4,5,6		
1 April 2021	Minimum of Euro 4	Euro 3
1 Oct 2022	All new vehicles Euro 5 or	

	above	
1 Oct 2024	All new vehicles Euro 6 or above	
1 Oct 2026	All new vehicles are ULEV	
1 Oct 2029	All vehicles to be ULEV	Euro 6b
Age limit of 20 years for ULEV		

4.3.3 The RCDA sent a representation as follows on 10th October 2019 and Appendix 3.

Date	Proposed Standard
1 st October 2019-1 Oct 2020	Minimum Euro 3 TXII 1 year policy
Existing 15 years policy	All other models including TX4, Mercedes Vito models
Minimum 20 years policy	All new vehicles ULEV

4.3.4 A response has been received by a hackney carriage driver asking for more plates to be issued. He has made a commitment to bring ULEV vehicles to the fleet if new plates are issued. His email is in Appendix 4.

4.3.5 A response from the Council's Environmental Protection Team on the proposal in 4.2.1 is as follows.

“The policy is an improvement on what is currently in place, but I would like it to be stronger to bring emissions down more quickly. I suggest:

- Replacement vehicles being less than 5 years old rather than 8
- 12 year age policy to continue after 2023 so that vehicles over 12 years old are removed from the fleet annually between 2023 and 2028 before all vehicles have to be ULEV.

That said, this proposal is a more balanced compromise between RBCs original proposal and the RTAs as it speeds up the removal over the oldest dirtiest vehicles and encourages replacement with ULEV vehicles.”

4.3.6 The Council is also exploring with London Electric Vehicle Company (LEVC) whether it would be viable to provide a number of ULEV vehicles for short term rent so that drivers can become familiar with the ULEV before purchase.

4.3.7 In July 2019 Transport for London released a staged approach age policy for their HCV fleet whereby ultimately no vehicle will be older than 12 years by 2022.

4.3.8 Manchester and Southampton councils currently have a maximum age policy of 12 years. Whereas Birmingham Council has a maximum age policy of 15 years and Milton Keynes has a maximum age policy of 10 years.

4.3.9 Oxford City Council require all Hackney Carriage Vehicles to be a minimum of Euro 4 from 1 January 2020, all new vehicles must be ULEV from 1 January 2022 and all vehicles must be ULEV by 1 January 2025.

5. CONTRIBUTION TO STRATEGIC AIMS

5.1 The proposals in the report meet the overall direction of the Council by meeting the Corporate Plan priorities as follows:

1. Securing the economic success of Reading and provision of job opportunities - the Council understands that HCVs are an important part of the overall transport strategy for the town
2. Keeping Reading's environment clean, green and safe - ensuring the reduction in emissions from HCVs and improving the overall air quality within the town.
3. Ensuring the Council is fit for the future - implementing the Government and Council objectives of a less polluting and lower carbon environment.

5.2 The decision contributes to the Council's strategic aims by:

- Developing Reading as a Green City with a sustainable environment and economy at the heart of the Thames Valley - reducing the emissions from the HCV fleet will contribute to a lower carbon footprint for the town.
- Promoting equality, social inclusion and a safe and healthy environment for all - reducing the emissions from the HCV fleet will reduce the NOx and particulate matter in the air which is associated with poor health outcomes.

6. COMMUNITY ENGAGEMENT AND INFORMATION

6.1 The HCV trade were consulted as the group of individuals who are most affected. The Reading Taxi Association gave their views on the proposal detailed in 4.3.2 and Appendix 2.

6.2 The RCDA have been consulted on this proposal. Their responses to our proposal are detailed in 4.3.3 and Appendix 3.

6.3 Several meetings were held with the RTA to come up with a further proposal that would be acceptable to all parties.

6.4 A meeting was held with the RCDA on 9th October 2019 to hear their views and encourage them to put forward a proposal.

6.5 The Licensing Team have received two communications from Councillors, one from Councillor Daya Pal Singh and the other from Councillor Rob White asking for comments and requesting that the Council consider tackling climate change but in a fair way respectively.

7. ENVIRONMENTAL IMPLICATIONS

7.1 The emissions strategy involves the reduction of carbon dioxide and the reduction of nitrogen oxide (NOx) and particulate matter namely particulate matter of size 0.01 mm (PM₁₀) and particulate matter of size of 0.0025 mmm (PM_{2.5}). Both NOx and particulate matter are found in diesel fuel. Particulate matter is also associated with tyre, brake and road wear.

7.2 Reduction in carbon emissions can be achieved by converting to Ultra Low Emission Vehicles (ULEV). These vehicles will be either 100% electric which will emit no CO₂, NOx or particulate matter or a hybrid model which uses electric in conjunction with either a diesel or petrol engine. The diesel or petrol engine will emit some CO₂, NOx or particulates

7.3 Reading has an Air Quality Management Strategy which covers NOx but also considers PM₁₀ and PM_{2.5}. There is a current 2015/16 action plan which identifies as one of its commitments to 'explore and implement ways to improve emissions from Reading's taxi fleet'. The 2015/16 action plan is in the process of being updated.

7.4 Furthermore Reading has been identified by the Department For Transport as failing to meet the National objective level for NOx of 40µg/m³. The site adjacent to the Hackney Carriage Vehicle rank at the South West Interchange was one of those sites.

7.5 Health - an improvement in air quality will improve health outcomes for people who work, live or socialise in Reading. The Reading's Joint Strategic Needs Assessment estimated that there were 63 deaths in 2017 of all-cause mortality attributable to anthropogenic particulate air pollution. Whilst levels in Reading do not breach the national level of particulate PM10 of 40µg/m³, average levels over the monitoring sites show 21µg/m³ with 2 of the 3 monitoring sites that have rising annual levels.

8. EQUALITY IMPACT ASSESSMENT

8.1 The decision will impact hackney carriage owners more than any other group of people.

9. LEGAL IMPLICATIONS

9.1 The Local Government (Miscellaneous Provisions) Act 1976, section 47(1) states that a District Council may attach to the grant of a licence of a HCV under the Town Clauses Act 1847 such conditions as the district Council may consider reasonably necessary. Section 47(2) states that without prejudice to the generality of the foregoing subsection, a district council may require any HCV licensed by them under the 1847 Act to be of such a design or appearance or bear such distinguishing marks as shall clearly identify it as a HCV. Section 47 (3) states that any person aggrieved by any conditions attached to such a licence may appeal to a Magistrates' Court.

10. FINANCIAL IMPLICATIONS

10.1 All HCVs must be licensed annually and will require a similar amount of staffing in order to process the licence and carry out the enforcement action. The amount of enforcement action will be similar for ULEV as for 100% fuel vehicles. The Council will receive a lower income from owners who purchase a ULEV. It is anticipated this will happen gradually between 2021 and 2029 but will peak in the years where a free licence is offered.

10.2 The financial implications arising from the proposals set out in this report are set out below. The running costs will reduce slightly with processing efficiencies.

It should be noted that officers are currently conducting further analysis of fees which is likely to change the income. These figures will need to be re-profiled once new fees have been set.

1. Revenue Implications

	2019/20 £000	2020/21 £000	2021/22 £000
Employee costs	£69,000	£70,500	£72,000
Other running costs	£12,000	£10,000	£8,000
Capital financings costs			
Expenditure	£81,000	£80,500	£80,000
Income from: Fees and charges Based on 231 annual HCV licences Estimate no of HCV converting to ULEV	-£80,388	-£76,039	-£70731

2019/21 - 0 ULEV			
2020/21 - 50 ULEV			
2021/22 - 111 ULEV			
2022/23 - 5 ULEV			
2023/24 - 5 ULEV			
2024/25 - 5 ULEV			
2025/26 - 5 ULEV			
2026/27 - 50 ULEV			
Total Income	- £80,388	-£76,039	-£70731
Net Cost(+)/saving (-)	£612	£3,961	£9,269

The net cost of the proposal can be funded from Licensing budget.

11. BACKGROUND PAPERS

11.1 Vehicle Certification Agency (Sept 2018) New Car Fuel Consumption and Emission Figures

Appendix 1 - The emission standard compared to the age of the vehicle is given below.

Euro Emission Std	Registration Date	Emission levels
3	Jan 01 - Dec 05	CO- 0.64 g/km NOx - 0.5 g/km PM -0.05 g/km
4	Jan 06- Dec 10	CO- 0.5 g/km NOx - 0.25 g/km PM -0.025 g/km
5a	Jan 11-Dec 12	CO- 0.5 g/km NOx - 0.18 g/km PM -0.025 g/km
5b	Jan 13-Aug 15	CO- 0.5 g/km NOx - 0.18 g/km PM -0.005 g/km
6	Sep 15- 2017	CO- 0.5 g/km CO ₂ - 130 g/km NOx - 0.08 g/km PM -0.005 g/km
ULEV	2017	CO ₂ - 50 g/km

RTA — READING TAXI ASSOCIATION

26th September 2019

Dear Lisa

Thank you for your email of 20 September outlining the Council's proposal for the new HCV Emissions Policy.

We are disappointed that the Council has decided to change the proposals put forward by us, which would have worked for both the Council and the trade.

We are not in agreement with this proposal in its current form, as this is not viable but instead puts a financial burden on us beyond what we could cope with. An unmet demand survey was undertaken less than a year ago which showed that our work had decreased by some 15% when compared to three years ago. As well as this we are in the midst of a Brexit crisis which no one knows the outcome of.

As you are no doubt aware the current emissions policy has been operational for less than a year now. Owners changed their vehicles before 1 October 2018 but many have subsequently, in good faith upgraded their vehicles in last six months at great expense. Under the proposed policy they will have a need to replace their vehicles by 1 October 2022, yet many will still have hire purchase agreements ongoing after this date. They will then be forced to take out further hire purchase agreements for the new vehicles. How can this be justified in any way especially as many have spent £20,000-£30,000 on replacing their vehicles?

Why is the Council removing the current 15 year age limit on HCV's? The Council follows TfL's fitness conditions for HCV's, and TfL has a 15 year age limit for HCV's. Why can we not continue with the 15 year age limit in Reading? The number of HCV's in Reading compared to London is minute. It must be remembered that the HCV's in Reading are purpose built for this job. Once they are removed from the fleet we are unable to sell them in the second hand car market and they end up being scrapped.

Under the Council's proposal we will be required to purchase either Euro 6 or ULEV. At the present time a Euro 6 vehicle costs in excess of £40,000 when hire purchase payments are taken into account and ULEV in excess of £70,000. There is also a big shortage of Euro 6 HCV's. Currently we have three Euro 6 vehicles in Reading, and another 213 would need to be purchased within the next three years. This will drive the price of Euro 6 vehicles through the roof putting these vehicles out of reach for many. Furthermore there is no infrastructure in place in Reading for ULEV's. Many drivers rely on on-street parking near their homes and would be unable to charge them due to a lack of charging points. Also the majority of HCV's in Reading operate on a double shift basis, so do drivers lose several hours of their working day as they will need to find charging points and charge their vehicles? Surely the infrastructure needs to be in place before we are buy these vehicles?

The council cannot keep battering the HC trade with emission policies. This will be the third such policy in the last six years. Private Hire Vehicle's (PHV) outnumber HCV's by more than three to one, yet we have not seen any emissions policy forthcoming from the Council for them? Is it because the Council knows that we cannot leave Reading but PHV's can go and be licensed by neighbouring Councils?

We are fully aware that the Council has made a public commitment to be carbon neutral by 2030 and the HC trade is prepared to work with the Council to meet this target. However this should not be done where it becomes financially impossible for us to continue working as taxi drivers. Is the Council prepared to offer an incentive to decommission HCV's like TfL has done and pay owners £10,000 - £15,000 to remove our vehicles from the fleet?

Taking the above into account we would like to propose the following:

1. Age limit of 15 years for Euro 4, 5 and 6 vehicles.
2. Euro 3 to be removed by 1 April 2021.
3. All new vehicles from 1 October 2022 onwards Euro 5.
4. All new vehicles from 1 October 2024 onwards Euro 6.
5. All new vehicles 1 October 2026 onwards ULEV.
6. All vehicles 1 October 2029 ULEV.
7. Age limit of 20 years for ULEV.

We truly believe that the above is the best way forward as it enables owners to meet the new emissions standards without extreme hardship as well as meeting the Council's 2030 carbon neutral commitment. We are totally committed to playing our part in this fight against climate change and pollution.

It must also be remembered that HCV's are only a very small part of the transport pyramid when compared with other road users in Reading.

Last but not least, this needs to be the final such policy for HCV's in Reading. We cannot and must not have another policy change.

Best wishes

Asif

Email from Asif Rashid, Chair of RTA on Thu 10/10/2019 19:41

Dear Lisa

Thank you for your email.

Following our discussions, I can confirm that the RTA is in agreement with the emissions proposal as outlined in your email which was agreed between us earlier today

If you need anything else please do not hesitate to contact me.

Best wishes

Asif

Sent from Samsung Galaxy S10+

On Thu, 10 Oct 2019, 17:45 Richards, Lisa, <lisa.richards@reading.gov.uk> wrote:

Dear Asif

Here is the proposal that we agreed today. I have amended 1/10/25 replacement ULEV to be clearer.

Date

Proposed Standard

23 Oct 2019

Age policy 15 years for all vehicles, 100% electric 20 year age policy

23 Oct 2019

All Replacement vehicles will be a min of Euro 5b and less than 8 years old. This rule will apply regardless of whether the vehicle is new to fleet or an existing vehicle.

1 Oct 2021

Age limit 14 years for vehicles up to and including Euro 5a (vehicles aged over 1/10/07 only)

1 Oct 2022

Age limit 13 years for vehicles up to and including Euro 5a (vehicles aged over 1/10/09 only)

1 Oct 2023

Age limit 12 years for vehicles up to and including Euro 5a (vehicles aged over 1/10/11 only)

1 Oct 2025

All Replacement vehicles are minimum ULEV and less than 8 years old. This rule will apply regardless of whether the vehicle is new to fleet or an existing vehicle.

1 Oct 2028

All vehicles to be ULEV

Best Wishes

Lisa

Lisa Richards MCIEH CEnvH

Licensing, Food & Safety Manager

Regulatory Services | Directorate for Economic Growth and Neighbourhood Services

Reading Borough Council

Civic Offices

Bridge Street

Reading

RG1 2LU

Appendix 3 - representations from RCDA

Email dated 6th October 2019

Dear Ms Richards

Further to your email regarding the emissions policy which are being proposed by RBC for the Hackney Carriage trade. We regret to inform you that these changes are not acceptable to the trade and we believe that this matter hasn't been given careful consideration I would request that you look into this matter again taking our points and views to consideration.

We strongly believe that the 15 year rule which was only passed year or so ago by the committee should continue as it stands and owners will have enough time to arrange for an electric vehicle when the age limit is over on their current taxis. I would also like to add that not enough is being done to protect our hackney carriage trade, you have apps like Ola, Uber and the local private hire who continuously illegally ply for hire and taking away our work, this puts a huge pressure on our earning and therefore we cannot afford to keep changing our taxis.

This new policy will put a huge financial burden on our trade and we cannot see how the trade will be able to meet the new requirements. Owners have recently purchased new taxis just over a year ago (and or) less than a year ago at considerable costs. Under the current proposals the trade will be required to purchase either a Euro 6 taxi which will cost between £40,000 to £60,000 to buy, the new electric taxi which will cost over £60,000 when hire purchase payments are taken into account. This is simply not affordable especially when not knowing what will happen with Brexit.

The current policy has been in force for less than a year, and a new policy will be the third such policy to come into operation for the taxi trade in Reading in the last six years. RBC cannot keep changing emissions policies which keep on affecting us, also the numbers of taxis in Reading is a very small compared to all other road users when taken into account.

We realise that currently there is a big emphasis on climate change and pollution and we all need to play our part in reducing this and we are prepared to do this. However this should not be done where it becomes impossible for us to continue working as taxi drivers.

I hope that you will take our concerns into account and we hope that a new policy will be one that is mutually acceptable to both the council and to the taxi owners. We would urge you to give our proposal serious consideration.

Thank you and I look forward hearing from you.

Regards
RCDA

Further email on 10th October 2019

Dear Ms Lisa Richards

Please find attached our proposal that we would like to put forward.

Tx2

1 year from 1st October 2019 to 1st October 2020

Tx4 Euro 4 Existing 15 year policy

Mercedes Vito Euro 5 and euro 6 tx4 euro 5 and euro 6 Existing 15 year policy.

All new electric taxis ULEV Minimum of 20 year policy.

The trade have just recently updated and purchased newer cabs because of the 15 year rule which you implemented over a year ago. You should honour this rule which would give us time to adjust, its totally unreasonable to expect the trade to invest £70,000 plus in such a short period time when they have not even had time to clear there current vehicle finances.

Please take our views to consideration and hope to here from you. Please do get in touch if you would like like to discuss anything further.

Regards.
RCDA