



NOTTINGHAM CITY COUNCIL
REGULATORY AND APPEALS COMMITTEE

Date: Monday, 18 December 2017

Time: 10.00 am

Place: LB 31-32 - Loxley House, Station Street, Nottingham, NG2 3NG

Councillors are requested to attend the above meeting to transact the following business

Corporate Director for Strategy and Resources

Governance Officer: Mark Leavesley **Direct Dial:** 0115 876 4302

1 MEMBERSHIP

To note the following membership changes:

- (i) the resignation of Councillors Rosemary Healy and Mick Wildgust:
- (ii) the appointment of Councillors Cheryl Barnard, Georgia Power and Nick Raine.

2 APOLOGIES FOR ABSENCE

3 DECLARATIONS OF INTERESTS

If you need advice on declaring an interest, please contact the Governance Officer above, if possible before the day of the meeting

4 MINUTES

Last meeting held on 25 September 2017 (for confirmation)

3 - 6

5 HACKNEY CARRIAGE AND PRIVATE HIRE VEHICLE AGE POLICY

Report of Regional Licensing and Policy Manager

7 - 18

CITIZENS ATTENDING MEETINGS ARE ASKED TO ARRIVE AT LEAST 15 MINUTES BEFORE THE START OF THE MEETING TO BE ISSUED WITH VISITOR BADGES

CITIZENS ARE ADVISED THAT THIS MEETING MAY BE RECORDED BY MEMBERS OF THE PUBLIC. ANY RECORDING OR REPORTING ON THIS MEETING SHOULD TAKE PLACE IN ACCORDANCE WITH THE COUNCIL'S POLICY ON RECORDING AND REPORTING ON PUBLIC MEETINGS, WHICH IS AVAILABLE AT WWW.NOTTINGHAMCITY.GOV.UK. INDIVIDUALS INTENDING TO RECORD THE MEETING ARE ASKED TO NOTIFY THE GOVERNANCE OFFICER SHOWN ABOVE IN ADVANCE.

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**NOTTINGHAM CITY COUNCIL
REGULATORY AND APPEALS COMMITTEE**

**MINUTES of the meeting held at Loxley House on Monday 25 September 2017
from 10.30 am - 12.05 pm**

Membership

Present

Councillor Brian Grocock (Chair)
Councillor David Smith (Vice Chair)
Councillor Mohammed Ibrahim
Councillor Gul Nawaz Khan
Councillor Dave Liversidge
Councillor Adele Williams
Councillor Linda Woodings
Councillor Jim Armstrong

Absent

Councillor Rosemary Healy
Councillor Carole McCulloch
Councillor Toby Neal
Councillor Mohammed Saghir

Colleagues, partners and others in attendance:

Richard Antcliff	-	Head of Licensing, Trading Standards and ASB)	
Angela Clark	-	Principal Environmental Officer)	Commercial &
Paul Dales	-	Safer Business Manager)	Operations
Angela Rawson	-	Regional Licensing and Policy Manager)	
Catrin Styles	-	Principal Environmental Officer)	
Ann Barrett	-	Solicitor to the Committee)	Strategy &
Mark Leavesley	-	Governance Officer)	Resources

6 APOLOGIES FOR ABSENCE

Councillor Healy - personal
Councillor Neal - other Council business
Councillor Saghir - no reason given

7 DECLARATIONS OF INTERESTS

Councillor Grocock declared an interest in item 7(a), minute 9(a), 'Safety Certificate - Nottingham Racecourse', as a City Council appointed member of the Racecourse Board, which did not preclude him from speaking or voting.

8 MINUTES

The Committee confirmed the minutes of the meeting held on 03 July 2017 as a correct record and they were signed by the Chair.

9 REVIEW OF GENERAL SAFETY CERTIFICATES - REGULATED STANDS

Paul Dales, Safer Business Food and Health and Safety Manager, presented reports of the Director of Community Protection, detailing reviews of the 'General Safety Certificates: Regulated Stands' at Nottingham Racecourse and Harvey Hadden Athletics Stadium.

- (a) **RESOLVED** that the thanks of the Committee, to all those involved with public safety at venues in the City, be recorded.

(b) **Nottingham Racecourse**

RESOLVED that

- (1) with effect from 25 September 2017, the existing 'General Safety Certificate: Regulated Stand' at Nottingham Racecourse be replaced by the General Safety Certificate detailed at annex 1 to the report;
- (2) the Committee noted the
 - (i) deviations from the Green Guide, detailed in appendix 4 to the General Safety Certificate:
 - (ii) appointment of James Knox as the Holder of the General Safety Certificate.

(c) **Harvey Hadden Athletics Stadium**

RESOLVED that

- (1) with effect from 25 September 2017, the existing 'General Safety Certificate: Regulated Stand' at Harvey Hadden Athletics Stadium be replaced by the General Safety Certificate detailed at appendix 1 to the report;
- (2) the Committee noted the deviations from the Green Guide, detailed in appendix 5 to the General Safety Certificate.

10 HACKNEY CARRIAGE SPECIFICATION - ADDITIONAL VEHICLES

Angela Rawson, Regional Licensing and Policy Manager, presented the report of the Director of Community Protection, requesting the Committee to amend the Council's existing Hackney Carriage vehicle specification to include 4 additional vehicle types.

RESOLVED that

- (1) the existing Hackney Carriage vehicle specification be amended to include the following vehicles, but only where the vehicle has a first date of registration of no earlier than 25 September 2017:

- Nissan Dynamo Electric Taxi;

and in cases where they have been converted by a specialist to meet the 'Reduced Emission Euro 6 Diesel Standard', as described in appendix 1 to the report, the:

- Ford Tourneo Taxi;
- Vauxhall Vivaro VX8 Taxi;
- Ford Procab.

- (2) the following officers, in consultation with the Chair, Vice Chair and Opposition Spokesperson, individually be permitted to approve the addition of further vehicle types to the Hackney fleet as they become available, provided that they meet the Council's safety specification requirements:

- Director of Community Protection;
- Head of Licensing, Trading Standards and ASB;
- Regional Licensing and Policy Manager.

11 PROPOSED AGE AND SPECIFICATION POLICY FOR HACKNEY CARRIAGE AND PRIVATE HIRE VEHICLES

Angela Rawson, Regional Licensing and Policy Manager, presented the report of the Director of Community Protection, requesting that the Committee approve for consultation a revised 'Age and Specification Policy' for hackney carriage and private hire vehicles.

RESOLVED that the 'Age and Specification Policy' be approved for consultation, for a period of 4 weeks, the results of which to be reported to this Committee at a later date.

12 CROSS-BORDER ENFORCEMENT

Angela Rawson, Regional Licensing and Policy Manager, presented the report of the Director of Community Protection, detailing a proposal to authorise officers from other authorities to carry out enforcement checks on vehicles and drivers licenced by Nottingham City Council.

RESOLVED that

- (1) the enforcement powers of the Council under sections 53(3), 68 and 73 of the Local Government (Miscellaneous Provisions) Act 1976 be discharged by the following councils, pursuant to the provisions of section 101 of the Local Government Act 1972, such enforcement powers only to be exercised in respect of Nottingham City licensed vehicles and drivers whilst operating within the boundary of the respective councils and only to be exercised by the respective councils' Authorised Officers:
- Broxtowe Borough;
 - Gedling Borough;
 - Rushcliffe Borough;
- (2) where considered expedient, and subject to agreeing reciprocal arrangements with the relevant council and to consultation with the Chair, the Regional Licensing and Policy Manager be authorised to add to the list of councils in (1) above;
- (3) the Committee agree to accept a similar transfer of functions from any council listed in (1) above, and any further Council(s) added under the delegated authority agreed in (2) above.

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REGULATORY & APPEALS COMMITTEE – 18 DECEMBER 2017

Title of paper:	Hackney Carriage & Private Hire Vehicles Proposed Age & Specification Policy	
Director(s)/ Corporate Director(s):	Andrew Errington	Wards affected: ALL
Report author(s) and contact details:	Angela Rawson – Regional Licensing & Policy Manager Angela.rawson@nottinghamcity.gov.uk 0115 8761749	
Other colleagues who have provided input:	Ann Barrett – Team Leader, Legal Services Ann.barrett@nottinghamcity.gov.uk Richard Antcliff Richard.antcliff@nottinghamshire.pnn.police.uk	
Date of consultation with Portfolio Holder(s) (if relevant)	N/A	
Relevant Council Plan Key Theme:		
Strategic Regeneration and Development		<input checked="" type="checkbox"/>
Schools		<input type="checkbox"/>
Planning and Housing		<input type="checkbox"/>
Community Services		<input type="checkbox"/>
Energy, Sustainability and Customer		<input type="checkbox"/>
Jobs, Growth and Transport		<input checked="" type="checkbox"/>
Adults, Health and Community Sector		<input checked="" type="checkbox"/>
Children, Early Intervention and Early Years		<input type="checkbox"/>
Leisure and Culture		<input type="checkbox"/>
Resources and Neighbourhood Regeneration		<input type="checkbox"/>
Summary of issues (including benefits to citizens/service users):		
The report asks members to consider a proposal for the introduction of a revised Hackney Carriage & Private Hire Vehicles Age & Specification Policy taking into account the responses to consultation together and any amendments to the proposals made as a result of them.		
Recommendation(s):		
1	That the Hackney Carriage and Private Hire Age & Specifications Policy at Appendix 1 be approved to take effect from 1 January 2020	

1 REASONS FOR RECOMMENDATIONS

- 1.1 The current specification for the Hackney Carriage fleet is now over 20 years old. The Council has various statutory requirements and targets in relation to air quality which sit alongside its licensing duties to ensure that hackney carriage and private hire vehicles are safe and of a suitable size, type, mechanical construction and design. The existing Hackney Carriage specification has not kept pace with significant advances in design and technology since it was first adopted. The current Hackney Carriage fleet is aging and showing signs of deterioration on a mechanical level.

- 1.2 Whilst the Private Hire fleet is younger due to the requirement that no Private Hire Vehicle is licensed after the age of 10 years from first registration, it is envisaged that with the increase in technology there is still scope for improvement.
- 1.3 The revision of the existing age policy and further amendments to vehicle specifications are necessary to not only introduce new technological advances to the aging fleets but also to support the Councils responsibility in relation to the lowering of emissions and the reduction in pollution levels from inefficient diesel cars.
- 1.4 Section 47 and 48 of the Local Government (Miscellaneous Provisions) Act 1976 allows a council to prescribe the design and appearance of both Hackney Carriage and Private Hire vehicles with the aim to ensure the safety of the travelling passenger. By amending the age policy and vehicle specifications, the customer will be provided with an identifiable method of transportation which is safe, comfortable and takes into account the technological improvements in the range of vehicle now available

2 BACKGROUND (INCLUDING OUTCOMES OF CONSULTATION)

- 2.1 Section 47 and 48 of the Local Government (Miscellaneous Provisions) Act 1976 allows a council to prescribe the design and appearance of both Hackney Carriage and Private Hire vehicles with the aim to ensure the safety of the travelling passenger.
- 2.2 Nottingham City Council (The Council) is required to ensure that all vehicles licensed by them adhere to minimum standards which are applied in a consistent and transparent manner. The standards concerned are defined by legislation, licence conditions and byelaws adopted by the Council. Together they identify what is expected and required of the trade and help to ensure a consistent approach is taken to reach those expectations.
- 2.3 As a City, Nottingham already has a responsibility to maintain a transport system which not only facilitates the needs of its users but which also contributes to meeting the Council's wider duties and responsibilities. The Hackney Carriage and Private Hire vehicles licensed by Nottingham City Council form an important part of that system.
- 2.4 The proposals for change were first raised at this Committee on 25 September 2017 and are set against the context of the Council's Hackney Carriage & Private Hire Vehicle Strategy 2017-2020 and the DEFRA Clean Air Zone Framework. An analysis of the age of the current fleets and their emission levels were also included in that report.
- 2.5 The Committee approved the release of the proposed policy for a 4 week consultation which commenced on 2 October 2017 and closed at midnight on 29 October 2017. The consultation documents were circulated to all drivers, vehicles owners, private hire operators and also relevant trade representatives.
- 2.6 Responses were received from 16 individuals and 3 responses from trade representatives of UNITE and NLTOLDA, on representing 225 signature in support. A summary of the consultation responses is attached at Appendix 2.

2.7 The responses were considered individually following which it is proposed that the following changes are made:

1. Allow a 2 year lead in period for the imposition of the policy requirements for private hire vehicles. This will take into account the financial costs involved to both trades whilst awaiting more commercial options to become available and means that the new age policy will now be introduced with effect from 1 January 2020.
2. Amend the age of introduction of a new or replacement private hire vehicle to 4 years instead of the proposed 3 years (currently 5 years) to take into account the financial implications. Private hire vehicles transit from the trade at 10 years old.
3. Removal of the proposed 16 year upper age limit for existing Hackney Carriage vehicles provided they successfully pass an Exceptional Condition Vehicle Check carried out by an authorised officer – this will allow the older vehicles to be replaced for more efficient cars by 2020.
4. Exceptional Condition Vehicle Checks for Hackney Carriages to be removed from 2020 to be replaced with 14 year age limit reducing to 12 years in 2025 for ZEC ULEV Hackney Carriage Vehicles.

3 OTHER OPTIONS CONSIDERED IN MAKING RECOMMENDATIONS

- 3.1 Retention of existing age policy – this would result in the existing fleets becoming unfit for the purpose due to their age and condition and consequently contribute to the CO2 emissions in the City.

4 FINANCE COLLEAGUE COMMENTS (INCLUDING IMPLICATIONS AND VALUE FOR MONEY/VAT)

None to the Council however there may be a financial implication to a proportion of existing proprietors and owners.

5 LEGAL AND PROCUREMENT COLLEAGUE COMMENTS (INCLUDING RISK MANAGEMENT ISSUES, AND LEGAL, CRIME AND DISORDER ACT AND PROCUREMENT IMPLICATIONS)

- 5.1 Before the Council may grant a Private Hire or Hackney Carriage Vehicle Licence it is required to be satisfied of certain statutory criteria regarding its type, size, design, condition and safety and it is lawful for a Council to adopt policies relating to such matters. This Policy appears to have been prepared taking into account the statutory criteria for vehicle licensing and in the context of the Council's own strategies and the Governmental agenda in respect of clean air standards. The draft Policy has been amended having regard to consultation responses even though there is no legal obligation to consult on such matters.
- 5.2 The adoption of a Policy is potentially challengeable by way of judicial review on public law grounds. Individual licensing decisions are open to challenge by way of appeal. As with all policies the Council is permitted to depart from its policy if exceptional reasons can be demonstrated as to why the policy should not be applied. Applications will need to continue to be determined on a case by case basis against the Policy should it be adopted.

6 STRATEGIC ASSETS & PROPERTY COLLEAGUE COMMENTS (FOR DECISION RELATING TO ALL PROPERTY ASSETS AND ASSOCIATED INFRASTRUCTURE) (AREA COMMITTEE REPORTS ONLY)

6.1 Not applicable

7 EQUALITY IMPACT ASSESSMENT

7.1 Has the equality impact of the proposals in this report been assessed?

No – not required as the vehicle specification defined by the Council takes into consideration all areas of the travelling public.

8 LIST OF BACKGROUND PAPERS OTHER THAN PUBLISHED WORKS OR THOSE DISCLOSING CONFIDENTIAL OR EXEMPT INFORMATION

8.1 None

9 PUBLISHED DOCUMENTS REFERRED TO IN COMPILING THIS REPORT

- Report to Regulatory and Appeals Committee of 25 September 2017
- Local Government (Miscellaneous Provisions) Act 1976
- Police & Town Clauses Act 1947
- Hackney Carriage & Private Hire Vehicle Strategy

CITY OF NOTTINGHAM



Nottingham
City Council

AGE AND SPECIFICATION POLICIES RELATING TO HACKNEY CARRIAGE AND PRIVATE HIRE VEHICLES

GENERAL

1. This policy will have effect from 1 January 2018
2. No Hackney Carriage or Private Hire vehicle shall be granted a licence unless it meets the City Council's approved vehicle specification and in accordance with the Council's earlier Policy it will still be the case that no licence will be granted for a Hackney Carriage Vehicle Licence unless that Vehicle is wheelchair accessible.
3. Nottingham City Council will refuse to renew a licence for a vehicle for use as a Hackney Carriage or Private Hire vehicle once the respective upper age limit has been reached.
4. **From 01/01/2020 additional vehicle specifications will be required for all vehicles.** Vehicle owners are encouraged to contact the Licensing Office for advice at least 2 years before the vehicle is due to reach the upper age limit or purchasing a new vehicle.
5. **From 01/01/2025**, any vehicle being licensed for the first time as a Hackney Carriage or Private Hire vehicle will be required to be ZEC ULEV
6. **From 01/01/2030**, no vehicle shall be licensed as a Hackney Carriage or Private Hire vehicle unless it is a Zero Emissions Capable Ultra Low Emission Vehicle

PRIVATE HIRE VEHICLES

From 01/01/2020

1. Only Private Hire vehicles FOUR (4) years of age and under from the date of first DVLA registration will be considered for first licensing or as a replacement vehicle.
2. Private Hire vehicles over the age of TEN (10) years from the date of first DVLA registration will ordinarily be REFUSED a licence
3. Private Hire vehicles over the age of THREE (3) years from the date of first DVLA registration will be subject to SIX (6) monthly MOT inspections carried out by Nottingham City Council testers

WHEELCHAIR ACCESSIBLE HACKNEY CARRIAGE VEHICLES

From 01/01/18

1. All applications for replacement Hackney Carriage vehicles will be ordinarily REFUSED unless the vehicle to be licenced is newer than the existing vehicle and is no more than SIX (6) years of age from the date of first DVLA registration
2. All Hackney Carriage vehicles over the age of THREE (3) years from the date of first DVLA registration will be subject to SIX (6) monthly MOT inspections carried out by Nottingham City Council testers.
3. Hackney Carriage vehicles over the age of TEN (10) years from the date of first DVLA registration will ordinarily be REFUSED a licence UNLESS the vehicle is in exceptionally good road-worthy condition and approved for use following an Exceptional Condition Vehicle Check carried out by an authorised officer.

From 01/01/2020

1. All Hackney Carriage vehicles will be required to be a minimum of Euro 6 Diesel or ZEC ULEV.
2. No Euro 6 Diesel vehicle will ordinarily be licensed as a hackney carriage if it over the age of TEN (10) years.
3. No ZEC ULEV vehicle will ordinarily be licensed as a hackney carriage if it over the age of FOURTEEN (14) years

From 01/01/2025

1. No ZEC ULEV vehicle will ordinarily be licensed as a hackney carriage if it over the age of TWELVE (12) years

* Euro 6 diesel relates to the engine AND vehicle both being manufactured after September 2015.

** ZEC ULEV definition – emit up to 50g/km CO₂ with a minimum of 30 mile emission range. A ZEC Hackney Carriage MUST be petrol if an internal combustion engine is used

Nottingham City Council

Responses to consultation

REVIEW OF AGE POLICY FOR HACKNEY CARRIAGE & PRIVATE HIRE VEHICLES

PH – Private Hire

HC = Hackney Carriage

NK – Not Known

ALL – relevant to all vehicles

Ref No.	Private Hire Hackney Carriage Not Known ALL	Summary of Respondents Comments	Authorities Appraisal of Comments	Authority's Response with regard to Proposed Policy
1	PH	Concern regarding increased cost of purchasing replacement car under three years by 2018. Advise possible change of Authority	PHV currently under 5 years as replacement, consider retention as would go off at 10 anyway	Compromise decision – new and replacement private hire vehicles to be under 4 years. Currently 5 years and the proposed age was under 3 years
2	ALL	Supports proposal in general Concerns re 5 year age for PHV	PHV currently under 5 years as replacement, consider retention as would go off at 10 anyway	Compromise decision – new and replacement private hire vehicles to be under 4 years to allow better choice. Currently 5 years and the proposed age was under 3 years.
3	HC	Concern with limited time to arrange finance and change car – could take up to a year Not enough charging point to go all electric	Valid time limit concern – consider removing 2018 limit to allow 2 year lead in period	Remove reference to 2018 and replace with 1/1/2020 implementation date
4	HC	Concern about being able to get/afford new vehicle by 2018	Valid time limit concern – consider removing 2018 limit to allow 2 year lead in period	Remove reference to 2018 and replace with 1/1/2020 implementation date
5	HC	Concern about being able to get/afford new vehicle	Valid time limit concern – consider removing 2018 limit to allow 2 year	Remove reference to 2018 and replace with 1/1/2020

		by 2018	lead in period	implementation date
6	HC	Concern re 2018 implementation relating to vehicles over 16 years being refused and the impact on drivers and families. Concerns re not enough new ULEV/Euro 6 vehicles wants Euro 5 retention. Request consideration of bio-gas option	Valid time limit concern – consider removing 2018 limit to allow 2 year lead in period Reasonable concern over availability of vehicles Question option of ‘bio-gas’ vehicles for future	Remove reference to 2018 and replace with 1/1/2020 implementation date Bio-gas not considered a suitable option taking into consideration the Clean Air Zone and would not address the problems of aging fleets.
7	HC	Concerns – removal of ECVC for vehicles purchased in 2009; zonal charge; cross border enforcement; loss of revenue due to cross border hiring; willingness to upgrade to Euro 5; request start 2020	Removal of ECVC necessary, change to minimum of Euro 5 Diesel; change implementation date to 2020 irrelevant matters = zonal charges & cross border enforcement/hiring	No consideration given to the Euro 5 diesel – would not comply with requirements of the clean Air Zone Did not consider ancillary relevant to the age policy
8	HC	Concerns regarding funding new vehicle now – request delay until 2020	Valid time limit concern – consider removing 2018 limit to allow 2 year lead in period	Remove reference to 2018 and replace with 1/1/2020 implementation date Council will explore funding options
9	HC	Concerns re buying new vehicle – just purchased 2014 plate – request 2025-2030 implementation. Concerns re enforcement of out of borough; want horse & carriage back	Consider moving to 2020 implementation and retaining ECVC provision until vehicle 12 years old	Remove reference to 2018 and replace with 1/1/2020 implementation date
10	HC	Object to 2018 proposal	Consider moving to 2020	Remove reference to 2018 and

		<p>Want scrap ECVC and 15 year age limit for existing cars</p> <p>Want 5 year annual MOT</p> <p>Raise CAZ & Zonal issues</p> <p>Want Euro 5 upgrades</p> <p>Financial burden</p> <p>Request vehicle change 2020</p> <p>No electric charging infrastructure</p> <p>225 signatures in support</p>	<p>implementation and retaining ECVC provision until vehicle 12 years old</p> <p>Taking step backwards – retain as existing</p> <p>Not relevant to age policy</p> <p>Will not ensure CAZ compliance</p> <p>Agreed possible</p> <p>Consider removal of 2018 implementation date</p> <p>Infrastructure planned to be in place</p>	<p>replace with 1/1/2020 implementation date</p> <p>Retention of ECVC not appropriate to ensure fleet is upgraded and meets the requirements of the Clean Air Zone</p> <p>Council will explore funding options</p> <p>Chargemaster have been designated the approved installer and will install 230 charging points during 2018</p>
11	HC	<p>Concerns regarding infrastructure availability; suggesting retaining Euro 4/5 cars until 12 years and exempt from congestions charge</p>	<p>Valid time limit and infrastructure concerns – consider removing 2018 limit to allow 2 year lead in period – congestion charge not relevant for this policy</p>	<p>Chargemaster have been designated the approved installer and will install 230 charging points during 2018</p> <p>Remove reference to 2018 and replace with 1/1/2020 implementation date</p>
12	HC	<p>Concern re 2018 implementation relating to vehicles over 16 years being refused and the impact on drivers and families. Concerns re not enough new ULEV/Euro 6 vehicles wants Euro 5 retention. Request consideration of bio-gas option</p>	<p>Copy letter of number 6</p> <p>Valid time limit concern – consider removing 2018 limit to allow 2 year lead in period</p> <p>Reasonable concern over availability of vehicles</p> <p>Question option of #bio-gas' vehicles</p>	<p>Remove reference to 2018 and replace with 1/1/2020 implementation date</p> <p>Bio-gas not considered a suitable option taking into consideration the Clean Air Zone and would not address the problems of aging fleets.</p>
13	HC	<p>Concern re 2018 implementation relating to vehicles over 16 years being refused and the</p>	<p>Copy letter of number 6</p> <p>Valid time limit concern – consider removing 2018 limit to allow 2 year lead in period</p>	<p>Remove reference to 2018 and replace with 1/1/2020 implementation date</p> <p>Bio-gas not considered a suitable option</p>

		impact on drivers and families. Concerns re not enough new ULEV/Euro 6 vehicles wants Euro 5 retention. Request consideration of bio-gas option	Reasonable concern over availability of vehicles Question option of #bio-gas' vehicles	taking into consideration the Clean Air Zone and would not address the problems of aging fleets.
14	HC	Concern re 2018 implementation relating to vehicles over 16 years being refused and the impact on drivers and families. Concerns re not enough new ULEV/Euro 6 vehicles wants Euro 5 retention. Request consideration of bio-gas option	Copy letter of number 6 Valid time limit concern – consider removing 2018 limit to allow 2 year lead in period Reasonable concern over availability of vehicles Question option of #bio-gas' vehicles	Remove reference to 2018 and replace with 1/1/2020 implementation date Bio-gas not considered a suitable option taking into consideration the Clean Air Zone and would not address the problems of aging fleets.
Page 16	HC	Concern re 2018 implementation relating to vehicles over 16 years being refused and the impact on drivers and families. Concerns re not enough new ULEV/Euro 6 vehicles wants Euro 5 retention. Request consideration of bio-gas option	Copy letter of number 6 Valid time limit concern – consider removing 2018 limit to allow 2 year lead in period Reasonable concern over availability of vehicles Question option of #bio-gas' vehicles	Remove reference to 2018 and replace with 1/1/2020 implementation date Bio-gas not considered a suitable option taking into consideration the Clean Air Zone and would not address the problems of aging fleets.
16	HC	Concern re 2018 implementation relating to vehicles over 16 years being refused and the impact on drivers and families. Concerns re not enough new ULEV/Euro 6	Copy letter of number 6 Valid time limit concern – consider removing 2018 limit to allow 2 year lead in period Reasonable concern over availability of vehicles Question option of #bio-gas' vehicles	Remove reference to 2018 and replace with 1/1/2020 implementation date Bio-gas not considered a suitable option taking into consideration the Clean Air Zone and would not address the problems of aging

		vehicles wants Euro 5 retention. Request consideration of bio-gas option		fleets.
17	HC	Concerned regarding retaining a 12 year age policy not financially sound for him as already suffering from lack of enforcement and may challenge the policy if adopted	Consider moving to 2020 implementation and retaining ECVC provision until vehicle 12 years old	Remove reference to 2018 and replace with 1/1/2020 implementation date and retention of proposals for age limits
18	HC	Concerns re own age and cannot take on additional financial burden. Comparison to London and believes should be licensed whilst passing MOT	Valid time limit concern – consider removing 2018 limit to allow 2 year lead in period	Remove reference to 2018 and replace with 1/1/2020
19	NK	Supports policy changes to reduce emissions particularly in HCs as PHVs can run greener cars so why not HCs	Valid comments – consider no changes	Considered as a whole and some amendments made whilst retaining integrity of the policy

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