

The Mayor's Draft Air Quality Strategy

All sections of **Taxi & Private Hire** will be affected by '**Environmental Demands**' in the coming years, so it is very important that we are pro-active in the discussions that take place in our sector.

It is also vital that **Politicians** embrace the realities and difficulties faced in an industry that actually reduces car ownership and completes the vital function of 'door to door' service **24 hours a day**, when many of the other public transport modes for a variety of reasons are not running.

The **London Mayor's Air Quality Strategy** and the lengthy and thorough consultation process should ensure that unrealistic, 'Politically Correct', solutions that will not work in practice are not inflicted on an unsuspecting industry.

Often what happens in **London** if followed elsewhere so we have a special responsibility to get this right and to embrace the current consultation opportunity that **Boris Johnson** has given the **London** part of our Industry.

Following consultation with the **London Assembly** and functional bodies, which ran from October-November 2009, **London Mayor Boris Johnson** published a second **Draft Air Quality Strategy** for public consultation on 28 March 2010.

The strategy sets out a framework for delivering improvements to **London's Air Quality** and includes measures aimed at reducing emissions from transport, homes, offices and new developments, as well as raising awareness of air quality issues.

Over the last few years, a number of innovative measures have been introduced to help improve air quality in **London**. Nevertheless, air pollution remains a problem in the capital, as is clear from the fact that **European Union** targets for air quality standards that were intended to be met in 2004 and 2005 have still not been achieved.

This public consultation now runs until 23 July 2010, and the final strategy is expected to be published later in 2010, having been extended from late June.

Following agreement at last year's **AGM** at the **Heathrow Marriott Hotel** in **October** the **LPHCA** convened and hosted a **Platinum Members Committee** in **November** to have discussions with the **Mayor's Special Advisor on the Environment – Isabel Dedring**, about how the **Private Hire Industry** in **London** could play its part in reducing emissions.

The **Committee** also invited **Transport for London (TfL) Board Member - Steven Norris**, alongside **Taxi & Private Hire Director John Mason** and their former **Director of Transport Policing and Enforcement, Jeroen Weimar**, to attend.

The consensus from the meeting was that **Private Hire** could play a role in reducing emissions but the **LPHCA** would wait until the **Mayor's Final Draft Strategy** appeared before officially responding.

Trade groups, comprising mainly of **LPHCA Members**, subsequently met at **Penton Street**, in a series of **Mayor's Air Quality Strategy Workshops**, where we had the opportunity to look at possibilities for **Private Hire**.



The primary outcome was that the simplest way to reduce pollution would be to grant 'bus lane' access to Private Hire in London.

It was pointed out that the major traffic polluters of **London** are in fact the **Licensed Hackney Carriage Taxis**.

A major problem put forward by Platinum Chauffeur and Executive Committee Chairman Bill Edwards from Brunel, was in regard to the difficulty that companies and individual Private Hire Drivers are having getting finance for newer and therefore cleaner vehicles since the credit crunch.

The **Mayor** subsequently published plans, which confirmed proposals and measures in a second '**Draft Strategy Air Quality Strategy Consultation Document**'.

During the **Platinum Members Committee Meeting** last year with the **Mayor's Advisor Isabel Dedring** and the other **TfL** representatives, it was put forward **that the simplest way to reduce environmental impact on the road network would be to allow Licensed PHV's access to the bus lanes**.

In fact in a letter to the **Mayor** we wrote in our response to his **Transport Strategy**, we said:

“At a stroke TfL and the Mayor could reduce emissions, improve services and meet several of the key objectives of the Mayor's Transport Strategy by giving licensed PHV's 'bus lane access'. Not only can Private Hire reduce emissions, it can reduce costs and no doubt bring them down further with access to bus lanes'.

The **Mayor** has now outlined a set of tough new standards to make the most polluting users of our road networks, including buses, taxis and vans, play their full part in cleaning up our city. Implementation will require the full cooperation of key organisations like the **LPHCA** to deliver.

Significant sources of PM₁₀ within **Central London** include cars (responsible for 23 percent), with **Taxis (responsible for 20 per cent)** and **Light Good Vehicles** (responsible for 17 per cent).

CONTINUED ON PAGE 34

As with most **European Community, Government** and **Department for Transport** consultations this one assumes the word **Taxi** to include **Private Hire Vehicles** throughout. Care however needs to be taken here so that the **Private Hire Industry** is not perceived to be the problem when it is the **Licensed Hackney Carriage** form of **Taxi** that is the causer of a great deal of **London's Nastiest Emissions**, not the far cleaner and on average younger **Private Hire Vehicles**.

Outline of proposals and key points from the consultation

Promoting more efficient 'eco-driving'

The Mayor will reduce emissions from the vehicles within his authority by implementing eco-driving training for bus, **Taxi** and **GLA** group drivers.

TfL will implement emissions efficient driver training for vehicles under the **Mayor's** control. **For Taxi and Private Hire Vehicle (PHV) Drivers, TfL** will identify suitable courses that existing drivers and applicants wishing to become drivers will be required to take in order for their application or renewal of licences to be granted.

London No-idling Zone

The Mayor will make **London** a 'no idling zone' with a particular focus on buses, coaches, **Taxis** and delivery vehicles and working with the boroughs, bus operators and other organisations will establish a No-Idling Zone throughout London.

Providing the right information to the public

The Mayor will provide clear information about emissions from transport and the public transport fleet, including **taxis**, to enable people and businesses to make **more informed transport choices**.

For example, identifying, in a simple way, the **Taxis** and **PHV's** with **lower emission ratings** will enable **members of the public** and **businesses** to actively choose to use **cleaner vehicles**. **New York City** has already adopted this approach with their '**Green NYC**' symbol and associated information campaign.

In order to promote the use of cleaner vehicles such as **Hybrids**, the **NYC Taxi** and **Limousine Commission** allows certain types of **Taxi** to use the '**Green NYC**' logo.

This is part of a wider public information campaign raising awareness about the environmental impact of an individual's travel choices.



Scrapping or retrofitting older, more-polluting vehicles

The Mayor will encourage **Central Government** to extend its '**scrappage scheme**' to target particular vehicles such as **Taxis** / **PHVs**, as well as introducing a grant scheme for retrofitting vehicles with pollution abatement equipment.

Proposals – the Mayor's complete proposals for Taxis & PHV's are below

Taxis

- The Mayor will seek ways to accelerate the take up of cleaner, new vehicles into the taxi fleet including introducing age-based limits for taxis. It is proposed that from 2012 no licence will be issued for a taxi over 15 years old. From 2015 it is proposed that this age limit will tighten to ten years.
- The Mayor will introduce a requirement for all new taxis entering the fleet to meet a minimum Euro 5 standard from 2012.
- The Mayor will encourage central Government and the industry to develop approaches that would mitigate as far as possible any costs of these measures, for example through extensions to the Government's vehicle scrappage scheme.
- The Mayor will work with the taxi manufacturing industry to develop an affordable zero-emission taxi such that all new taxis entering the fleet are zero emission by 2020 and 60 per cent more fuel efficient than today by 2015.
- The Mayor, through TfL and working with the taxi industry and boroughs, will reduce idling and empty running by exploring the potential for additional taxi ranks and suspension of stopping and waiting restrictions where appropriate. The Mayor will also support the development of new technologies which encourage taxi sharing and enable electronic hailing.
- The Mayor, through TfL, will work with the taxi industry to introduce eco-driving training from 2012 to promote efficient driving techniques to reduce emissions.

Private Hire Vehicles (PHVs)

- The Mayor will introduce into the licensing regime age-based limits for PHVs. A ten year rolling age limit will be applied for vehicles being re-licensed from 2012 onwards.
- The Mayor will introduce a requirement for all new PHVs entering the fleet to meet a minimum Euro 4 standard from 2012.
- The Mayor, through TfL, will work with the PHV industry to introduce eco-driving training from 2012 to promote efficient driving techniques to reduce emissions.
- The Mayor, through TfL, will seek to provide incentives for the use of low-emission vehicles through variable or reduced licence fees.
- The Mayor will work with vehicle manufacturers to develop zero-emission vehicles that will be suitable as PHVs by 2020.

What needs to be done?

By improving emissions from buses, taxis, PHVs and the GLA and boroughs' own vehicle fleets, overall levels of emissions, particularly of PM and NOx, can be reduced. To do this it will be necessary to introduce new requirements for the vehicles used as buses, taxis and PHVs and to promote new technologies which will help achieve long-term improvements in air quality.

Taxis and PHVs

TfL, working with the industry and stakeholders, will develop a detailed plan for reducing emissions from taxis and PHVs in the course of 2010, which will set out more detailed actions, timescales and costs and an implementation plan to 2020.

This is already underway, including extensive discussions with drivers, trade bodies and manufacturers. This approach will reflect changes taking place in the taxi industry, for example, increasing use of leasing arrangements. In the meantime, a number of measures are being proposed to take early action to address and reduce these emissions.

To further promote the use of newer, cleaner taxis, the Mayor will use the licensing regime to remove the oldest vehicles from the fleet. The Mayor will introduce age-based limits for taxis and PHVs.

From 2012 a rolling fifteen year age limit will be set for taxis so that no taxis over fifteen years old could be licensed to operate in London unless by a special exemption. From 2015, it has been proposed that this would tighten to ten years. For PHVs, a ten year rolling age limit will be introduced from 2012.

This reflects the differential values of the vehicles used for private hire and taxis and the broader structures and licensing requirements of the two industries. As part of the ongoing discussion on these proposals, possible incentives to reward lower-emission taxis are being explored.

The Mayor strongly believes that London's famous taxi trade can and should lead the world in moving towards a zero emission future. He will work with the trade and manufacturers to create a viable road map to this end. The taxi must be affordable for drivers and enhance the passenger experience. The aim is to produce a taxi which has 60 per cent lower fuel consumption by 2015 (based on current levels) and zero tail pipe emissions by 2020, which will deliver significant air quality benefits.

The Mayor will also work with the vehicle manufacturing industry to develop zero emitting vehicles that are suitable as PHVs by 2020. The Mayor and TfL will assist the industry in identifying funding opportunities to help cover the costs of development from EU, central Government, industry investment and sponsorship sources. As part of this, the GLA is working with partners to deliver 20 fuel cell taxis on London's streets by 2012. To promote the use of cleaner taxis, the Mayor will

provide information on the air quality emissions from taxis, potentially through a symbol or colour code.

For PHVs, the licensing regime will be amended to incentivise the use of lower emissions vehicles. Further steps will be taken to promote the use of the cleanest vehicles, potentially by branding these vehicles and giving their operators additional benefits.

For both taxis and PHVs, the Mayor will seek to eliminate situations where drivers are effectively forced to keep engines running – for example at taxi ranks at stations. A number of boroughs have indicated that they would be supportive of this approach if it would reduce the amount of empty running by taxis and private hire vehicles and that they may be able to provide additional space for taxi ranks and private hire stands, especially at stations.

Given the large number of kilometres driven by taxi and private hire vehicle drivers there are particular benefits to be had from optimising driving style and the way a vehicle is generally operated. For this reason the Mayor will introduce eco-driving training for taxi and private hire vehicle drivers. This can also deliver very significant fuel costs savings to drivers, with no expense to them.

The Mayor will work with the industry to mitigate any potential negative economic impacts of these measures as far as possible; for example, by pressing central Government to extend the size and scope of the vehicle scrappage scheme to include taxis and PHVs.

Clearing the air

It should also be noted that there are considerable potential savings in terms of reduced fuel and running costs which will benefit taxi drivers adopting newer, cleaner taxis, financially.

There are also opportunities to work with organisations such as the Olympic Delivery Authority and the London Organising Committee for the Olympic Games to ensure that the transport vehicles used in the Games are fuel efficient. The GLA is already in active discussions with both organisations to ensure that the cleanest possible vehicles are used in the over 4,000 strong vehicle automotive sponsor fleet and the similarly sized fixed support fleet.

Turn to page 38 to read the proposed LPHCA Draft response...



OUR PROPOSED DRAFT RESPONSE

The **LPHCA** welcomes the opportunity to respond to the **Mayor's Draft Air Quality Strategy Consultation** and recognises the importance of protecting the environment and meeting **European Union** targets for 'air quality standards' in **London** and elsewhere.

BUS LANE ACCESS

- As a '**fully regulated and licensed industry**' we believe there are opportunities for us to play a part with the assistance of **TfL**, the **Mayor** and **London Boroughs**.

As previously put to the **Mayor – the simplest way to reduce environmental impact on the London Road network would be to allow Licensed PHV's access to the bus lanes.**

Following the very successful experiment to allow **Motorcycles** to use the **Transport for London Road Network (TLRN)** there is now a great case for **TfL** to start a series of experiments for 'bus lane usage' for **Licensed Private Hire Vehicles** in **London**.

VEHICLE AGE LIMITS

- The **LPHCA** has traditionally been against arbitrary age limits for vehicles, however at our **AGM** a 'straw pole' was taken of **London Members** and not a single operator had a vehicle over 10 years of age on their fleet. We estimate that many thousands of vehicles would have been covered by this vote, so such a limit would not appear to affect the **Licensed Private Hire Industry** in **London**.

It must be pointed out that any age limit set for **PHVs** in **London** must have a robust exemption mechanism for '**Specialist Provision**' vehicles, especially for high value and low mileage vehicles.

VEHICLE SCRAPPAGE SCHEME FOR TAXIS & PHVS

- We are delighted the **Mayor** will work with the industry to mitigate any potential negative economic impacts of measures as far as possible and we look forward to assisting the **Mayor** in pressing **Central Government** to extend the size and scope of the old vehicle scrappage scheme to include **Taxis** and **PHVs**.

OTHER NEW VEHICLE ASSISTANCE

- The **LPHCA**, in working with **TfL** and the **Mayor**, would like his kind assistance in pressing **Government** to do something about the '**finance of vehicles blockage**' that has been in place since the '**Credit Crunch**'. Until this artificial inhibiting factor is removed from the marketplace, vehicles will be retained longer and fleet stock will age, which will not help the **Mayor's Air Quality Strategy** or the **Environment**.

PROMOTING MORE EFFICIENT 'ECO-DRIVING'

- We are pleased that the **Mayor** will reduce emissions from the vehicles within his authority by implementing eco-driving training for **Licensed Taxi** and **PHV Drivers** and once again we look forward to assisting the **Mayor** in identifying suitable courses that existing drivers and applicants wishing to become drivers will be required to take.

LONDON NO-IDLING ZONE

- We look forward to seeing proposals on a **London No-idling Zone** but wish to state at this early juncture that enforcement activity should take into account the nature of 'pick up and drop' services, with appropriate and not over-zealous enforcement.

PROVIDING THE RIGHT INFORMATION TO THE PUBLIC

- We are happy that the **Mayor** will provide clear information about emissions from transport and the public transport fleet, including **Taxis** and **PHVs**, to enable people and businesses to make **more informed transport choices**.

In principle, identifying, in a simple way, **Taxis** and **PHV's** with **lower emission ratings** to enable **members of the public** and **businesses** to *actively choose* to use **cleaner vehicles** is sound. This does however need to be considered in the more wider context of **Private Hire Licensing** and should form part of a **Major Review** the **TfL Taxi & Private Hire Directorate** are about to embark on, which will include future signage requirements.

PRIVATE HIRE VEHICLES – SPECIFIC PROPOSALS

- The **Mayor** will introduce into the licensing regime age-based limits for **PHVs**. A ten year rolling age limit will be applied for vehicles being re-licensed from **2012** onwards.
- The **Mayor** will introduce a requirement for all new PHVs entering the fleet to meet a minimum **Euro 4** standard from 2012.
- The **Mayor**, through **TfL**, will work with the **PHV** industry to introduce eco-driving training from 2012 to promote efficient driving techniques to reduce emissions.
- The **Mayor**, through **TfL**, will seek to provide incentives for the use of low-emission vehicles through variable or reduced licence fees.
- The **Mayor** will work with vehicle manufacturers to develop zero-emission vehicles that will be suitable as **PHVs** by **2020**.

COMMENT & SUMMARY

The **LPHCA** is pleased to work closely with **TfL** and the **Mayor** on his **Draft Air Quality Strategy and Policy** and we broadly welcome the proposals.

It is **LPHCA Policy** not to generally comment about the **Hackney Carriage Industry** as they like to speak for themselves, however *many of our Members* have raised the question as to why this generally far more polluting form of **Taxi** has a far more lenient set of requirements in the draft policy?

If we are to seriously reduce noxious emissions in **London** we wish to state that all forms of **Public Transport** should be treated equally. This position we expect to be ratified at our **AGM** in the **Autumn** and in particular we look forward to the reasoning behind this disparity.

It is our intention as a responsible **Trade Association** to encourage our members to over exceed the 10 year Age Limit requirements by proposing an 8 year or less voluntary target.

Thank you for the opportunity to provide feedback on your consultation.

Steve Wright MBE, Chairman

LPHCA London Members

Please feedback any further thoughts to us by email, fax, telephone or in writing **before Friday 16th July 2010** to enable us to forward to the **Mayor**.

You can also feedback directly any thoughts electronically to the **Mayor** via a link in the **Members Area** of our website www.lphca.co.uk