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**SUBJECT:** Submission to Air Quality Panel: Licensing

**DATE:** 20 November 2014

**RECIPIENT:** Air Quality Scrutiny Panel

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**Does Licensing and its processes take into account air quality?**

The only area where Licensing has a link with air quality are taxis and private hire vehicles. The authority has set conditions to restrict the age of the vehicles that can be licensed. Until last year this was seven years for a normal vehicle and ten years for wheel chair accessible vehicles. However last year the trade asked for the life of vehicles to be extended by two years, their reason was at a time of austerity the trade needed that extra breathing space. There was a concern that older vehicles are likely to be less environmentally friendly and this was raised. The Licensing Committee agreed to the extension requested which means presently the Council will licence vehicles until they are nine years old for saloon type vehicles or 12 years for wheelchair accessible vehicles; so presently this is the only consideration with a link to air quality.

**Would Licensing be supportive of a City-wide Low Emission Strategy?**

In principle the Council's Licensing Manager would be happy to support a City-wide Low Emission strategy. Although it must be noted that such a strategy will need the support of the Licensing Committee. The taxi trade will argue it is difficult enough now to make a living and it would be expected that any changes in policy that has a negative cost implication to them will be resisted vigorously.

In Southampton there is a small increase in the number of hybrid vehicles being licensed and some sections of the trade recognise the financial benefits of these vehicles. However hybrid vehicles are expensive to purchase therefore smaller traders or one person interest vehicles will struggle to fund such purchases. A factor that influences the decisions of type of vehicle to use is the docks trade. To work the Port of Southampton effectively the vehicle needs to be able to cope with large amounts of luggage. The Toyota Prius is the vehicle of choice in the hybrid range but Toyota has not released the estate version in this country and have no plans to in the future. The normal saloon has inadequate boot space to operate in the docks and those that have bought a Prius have decided not work in the docks. The vast majority of the hackney trade rely on docks work to make a living and it is a significant portion of the private hire trade's work as well.

The Council could work towards an emission based policy for vehicles instead of an age based one, however there are difficulties in checking the compliance. Diesel engines are the main issue. This is said because a basic diesel engine is no different now to one of twenty years ago. What assists the engine to be more efficient or cleaner has changed, but unfortunately these 'add ons' go wrong from time to time and are expensive to replace. For example, Diesel Particulate Filter (DPF) only works when the engine is hot and requires a vehicle to go on a long journey regularly to operate, if it does not, it would need replacing costing at least £1,000.

In Southampton, the average journey for a taxi is three miles and in consequence the DPFs fail after a short time. The trade has found a work around by bypassing the DPF, however it would take a mechanic four hours to determine if the DPF has been bypassed making any compliance check costly, inefficient and unlikely to be proportionate or justified. The trade will also compare what is happening to other forms of transport, especially but not restricted to buses to ensure they are treated on equal terms.

One option might be to include in the policy Euro standard 5 or 6 engines. To prevent driving a number of the trade out of business any change in policy will need to be introduced over a number of years, at least three years, to allow effective financial planning by the trade.

Finally, licensing fees can only be used to cover the administration costs of processing and servicing the licence. The fees cannot be used to subsidise other such projects.

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