

Dear Secretary of State

As you will know, hackney and private hire services are a crucial part of our transport network. The journeys they provide are a lifeline for many, they underpin our evening and night time economies and not least, the sector provides a significant number of jobs, both directly and through the wider supply chain.

We are increasingly concerned however about the consequential effects of Government directed policies and guidance, particularly on the hackney carriage sector. Without further consideration and support, the trade is clear that current policy may well threaten livelihoods and the sector as a whole and impoverish convenient and wheelchair accessible hackney carriage provision.

We fully endorse the case for improving air quality, reducing carbon emissions and improving standards for our locally licensed fleets. Locally, we are putting in place measures and policies that directly support these shared goals.

And of course, it is vital that taxi and private hire services that operate in our communities reduce their NO2 emissions, but it is concerning that by focusing almost exclusively on that important but narrow objective, JAQU to have not appreciated the predictable and consequential policy effects.

In many urban areas, hackney vehicles have been licensed to a higher standards than private hire, typically requiring them to operate wheelchair accessible, 'London' style black cabs. Hitherto, this provided drivers and owners with a predictable business model, and the wider public with access to a versatile and accessible fleet.

However, in the context of JAQU's guidance relating to Clean Air Zones (CAZ), hackneys and private hire are included in all CAZ definitions. This, combined with the current legislative loophole that permits local regulatory evasion by private hire drivers and vehicle owners, means it is difficult to achieve the same high standards across the private hire sector through licensing policy even as they directly compete for a similar market as hackney carriages. It is for example effectively impossible to require wheelchair accessible vehicles across the local private hire fleet, as anyone who chose not to could simply seek a driver and vehicle licence elsewhere and continue to serve the local market using a standard saloon car.

The hackney trade was already seeing reduced demand, to some extent as a result of new app-based private hire business models, and both sectors are clear that they have been hugely impacted by the economic consequences of COVID-19. Whilst the acceleration of Government's policy to reduce transport-related carbon emissions is welcomed, as per Green Industrial Revolution, together these pressures are combining in such a way as to place the trade in an unsustainable position, not least as wheelchair accessible, and zero emission capable vehicles suitable for hackney services require a very high initial capital outlay.

It is in this dynamic context that we believe that the current Government approach needs serious review, if it is to properly support the sector.

We would propose the following approach from Government.

- In assessing the case for funding support to help renew hackney and private hire fleets in the context of a local Clean Air Zone, considering wider implications, for example:
  - the likely effects on the provision of wheelchair accessible vehicles and other adapted vehicles (for example for SEND transport), and local authorities equalities responsibilities

- the likely effects on supporting the shift to ZEC vehicles
- Closing the loophole which permits out of area operation for private hire. This practice allows fair and democratically determined local safety and environmental standards to be undercut, threatening the achievement of local and national policy objectives.

This approach would then give local authorities the regulatory and funding tools to achieve our shared goals, by providing adequate support for hackney owners to renew their vehicles in a way that met both environmental and accessibility requirements, and ensured that local private hire fleets were also subject to local regulation.

We would be keen to pick up a dialogue on the matters raised with you and your officials at the earliest opportunity.

Yours sincerely,

CC – Joint Air Quality Unit