

Scottish Taxi Federation submission of 1 December 2022

PE1856/S: Support the taxi trade

You requested that I follow up my evidence on 26 October 2022 with a written submission.

Civic Government (Scotland) Act 1982

The **Civic Government (Scotland) Act 1982** is outdated and fails to represent the significant changes in provision of taxis and private hire vehicles, especially the advance of technology. In the absence of legislative clarity, technologists, such as Uber, continue to exploit the disruption in the trading practices of public hire taxis in their favour.

The instances of private hire vehicles illegally picking up members of the public without prior bookings is now commonplace, with nightly observations of non-licensed vehicles blatantly presenting themselves for 'hire' at prominent locations. However, rather than addressing the issue, it appears to have become an accepted practice by the police and enforcement officers either due to a genuine lack of awareness or on account of deliberate decisions based upon perceived greater priorities.

The Scottish Taxi Federation draws attention to the public safety dangers of tacit acceptance of such illegal practices, with journeys being unlicensed and uninsured, and providing a greater risk to the travelling public of 'being ripped off' in unregulated journeys.

Low Emission Zone

Cost of New Vehicles

Our support for a Low Emission Zone (LEZ) is with consideration that compliance comes at a cost, with an **entry-level LEZ compatible vehicle is around £40,000 rising to £72,000 for an electric range extended hybrid (LEVC Hybrid)**. A solely EV option is yet to be launched in the UK.

The only real option available for a new vehicle is the LEVC Hybrid but at a significant cost. With the application of the UK Government Grant, **the current cost of a new LEVC Hybrid is £64,500**; with finance

arrangements, this equates to **£888 per month over a six years term**. Questionable whether this a cost-effective option, especially without guarantees that councils will not proceed towards “Zero Emissions”.

A further consideration for LEVC owners is the increasing electricity costs, which offsets the potential benefits on fuel. Indeed, **EV charge costs are noted as being up to 80p kw** in some parts of Scotland.

2nd Hand Vehicle Market

The availability of second-hand compliant taxis is limited.

Retrofit Options

Based upon a recent survey conducted by Glasgow Taxis, the conversion of existing vehicles to achieve compliance is the preference of most owners; undoubtedly based upon cost and the availability of Government grant support.

The Scottish Taxi Federation notes that such low-cost options are typically decommissioned from the London market and are already a minimum of 10 years old, subject of circa. 150,000 miles and many have already benefited from £10,000 of public funding.

The current retrofit options are:

LPG Conversion

Conversion of TX4 to LPG cost circa. £13,000 with Energy Savings Trust providing circa. £12,000 support. A point of note has been the challenge of obtaining LPG sources.

Cybrand Conversion

Costing an estimated to be around £5,500 / £6,000, the retrofit of Euro VI exhaust system and AdBlue system to TX4, Mercedes Vito and Peugeot E7 provides LEZ compliance. This is cost effective for the owner, paying circa. £1,500. It should be noted there are currently issues in accessing the necessary telematics software is proving impossible to obtain, causing an inherent delays.

Better Funding Option – Grant Funding for New Vehicles

In our opinion, any available financial support would be better directed towards replacing ageing vehicles with LEVC and other Euro VI vehicles rather than committing up to £25,000 - £35,000 of public money to maintaining old vehicles.

Greater Manchester (GM) are in the process of introducing a Clean Air Plan (CAP). During early 2020 they had put forward a proposal to support Taxi operators buying an LEVC Hybrid Taxi, to receive £20,000 grant towards the cost of replacing a non-compliant vehicle with the aforementioned Hybrid.

However, as you will see from the minutes (see link), they have recognised, and taken cognisance of the CoVid-19 Pandemic and the current cost of living crisis, coupled with the impending recession. To that end, I include a link to their most recent meeting, Economic Development (greatermanchester-ca.gov.uk) of the GM Air Quality Administration Committee from 17th August 2022.

You will note the current proposed figure for supporting the Hackney Carriage trade at Paragraph 1.6. You will note from the attached screen shot of the GM CAP website, a recognition that some operators, had planned to take advantage of the initial offering, which is currently paused (as outlined), but GM do not want operators to be disadvantaged.

The Scottish Taxi Federation recommends the approach of Manchester City Council in supporting owners through the provision of a grant towards the purchase of LEVC instead, alongside other specific support for owners. We recognise this also stimulates the second-hand market for Euro VI compliant vehicles.

Drivers Shortages

The average age of taxi owners is **59 years of age**, with drivers currently **54 years**. **The Scottish Taxi Federation observes that if the supply chain of new drivers cannot be re-established then the trade will cease to exist over the coming the decade.**

Taxi owners across Scotland report they are unable to secure drivers for their vehicles, which has a direct impact on the service provision especially in respect of the night-time economy.

Driver Recruitment

The Scottish Taxi Federation has supported its members to initiate campaigns to encourage new entrants into the taxi trade but such multi-faceted recruitment campaigns have only gathered limited interest.

Topographical Test

The topographical test, where applicable by a local council, has been deemed to be the largest singular barrier preventing people from entering the taxi trade, with potential candidates deterred by the scope and level of relevance. A successful candidate still requires navigate the outdated rote learning requirements, which is clearly obsolete and largely irrelevant to actual provision of service.

In Glasgow, the Leader of the Council intimated her support for the temporary withdrawal of the Topographical Test to support the identification of new drivers but the Council's Licensing and Regulatory Committee refused the request to relax the Test.

SVQ Professional Taxi Driver Qualification

A further prerequisite for a new taxi driver licence is any applicant must have gained the **SVQ Professional Taxi Driver Qualification**.

Scottish Taxi Federation accepts that the content of the new Course and the learning outcomes, and moreover, believes it will impact positively on the taxis trade. However, it is acknowledged that attaining this new qualification does incur an additional time and cost, estimated at **£400 per person**.

"Support for Taxi Trade" - Request of Parliament

In conclusion, sadly, we concur with Alexander Stewart MSP's comments during the Session that the "(taxi) industry is in crisis" when all these factors are considered together (i.e., death by 1,000 cuts).

Without intervention, put simply, there will be no taxi trade (Public Hire) in its current form by the end of the next decade. However, with the support of Scottish Government, Councils, and partners, this is entirely avoidable and we make the following key requests, namely:

- **Maintaining & enforcing the legal distinction between Public Hire and Private Hire, as part of a wider revision of the Licensing (Scotland) Act 1982.**
- **Promoting taxis as a key component of Scotland's Public Transport and as a viable solution to reducing private car usage.**
- **Consider the wider implications for the taxi trade in respect of the implementation timeline of Low Emission Zones and any future planning for 'Ultra Low' / 'Net Zero' Emission Zone.**

I would be delighted to provide the Committee with clarification on any of the points raised in this submission or provide any further information sought in its considerations.