

# Confederation of Passenger Transport (CPT) Scotland submission of 16 December 2022

## PE1960/B: Formally recognise private hire cars and taxis as modes of public transport

Thank you for your letter of 9 December 2022 seeking the views of the Confederation of Passenger Transport on the above petition, considered by the Committee on 7 December.

The Confederation of Passenger Transport (CPT) Scotland is the trade association for the bus and coach sectors. CPT facilitates and represents a dynamic bus and coach industry in Scotland to provide better journeys for all, creating greener communities and delivering economic growth. We do this by representing over 100 members in Scotland from across the industry be they large or small, bus or coach, operator or supplier. We campaign for a supportive policy environment, give our members practical advice and support to run their businesses safely, compliantly, and efficiently and bring the industry together to share ideas and best practice.

At both Scottish and UK level CPT decision making is led by Committees comprised of representatives from our membership of operators and suppliers. In addition to this we are members of, and lead, various stakeholder groups in the bus and coach sphere (for example the Scottish Government's current Bus Taskforce and its accompanying subgroups), in the wider public transport space, and in other connected policy areas including climate change and public health.

Your letter asks how the views of the taxi and private hire trade are included in our decision-making processes; what scope there is to include the taxi and private hire trade in public transport stakeholder groups; and how engagement and consultation on decisions that affect the services provided by taxi and private hire industry could be improved.

On the first question, CPT Scotland looks to understand the views and concerns of those who share the roads with buses and coaches, but there is no formal role for taxi and private hire in our organisational structure, as we only represent the coach and bus sector.

In terms of the scope to include the taxi and private hire trade in public transport stakeholder groups, given that they are by name a 'private' vehicle it may be more appropriate that the trade is represented in wider transport groups and forums at national and local level consulting on and making decisions about the roads and vehicles they use.

Finally, on improving engagement and consultation on decisions that affect the services provided by the taxi and private hire industry, the petitioner does not specify which issues, but the solution is more likely to lie in building and maintaining relationships with the planning and policy colleagues they mention, at local and national level through representative groups, in the same way that CPT does on behalf of our members.

We are sympathetic to the petitioner's concern that their sector is not being fully engaged with and consulted with on transport issues which affect their members, and appreciate they provide a valuable service. However, we do not agree that classifying individual, private, cars as modes of public transport in policy and planning discussions will help achieve the Scottish Government's stated desire to reduce car kilometres. For example, treating services such as the private cars used by Uber and Lyft as a form of public transport and allowing them to, for example, utilise bus lanes while carrying a small number of passengers would negatively impact any benefits to reliability and reduced emissions associated with bus priority measures.

I hope this is helpful to you – please let me know if we can provide any further information.