

# Regulatory Committee

9.30am, Tuesday, 24 October 2017

## Age Limitation of Taxis and Private Hire Cars (Air Quality) Consultation Update

Item number	6.1
Report number	
Executive/routine	Executive
Wards	

### Executive Summary

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A motion calling for a report on the feasibility of introducing a maximum age limit for taxis and private hire cars licensed by the City of Edinburgh Council was approved at the meeting of the Regulatory Committee on 25 June 2016.

A feasibility report was presented to the Committee on 21 November 2016. The Committee noted the contents of the report. The Committee further agreed in principle that the conditions of licences will be altered to improve the air quality in the city by reducing emissions from taxis and private hire cars, and instructed the Executive Director of Place to consult with relevant officers, the public, and the trade on options to achieve this, and to report back to the Committee in six months' time.

This report updates the Committee on the outcome of that consultation.

## Age Limitation of Taxis and Private Hire Cars (Air Quality) Consultation Update

### 1. Recommendations

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It is recommended that the Committee:

- 1.1 notes the contents of this report;
- 1.2 agrees that the conditions of taxi and private hire car licences will be amended to include specific conditions to require licensed hire cars to progressively meet Euro 6 Emission Standard or any subsequent Euro Emission Standard (or U.K. equivalent);
- 1.3 agrees that the introduction of the emission standard should be incremental;
  - 1.3.1 to implement a Euro 5 emissions standard as the minimum standard for both taxi and PHC applications and renewals with effect from 1 December 2018;
  - 1.3.2 thereafter, to introduce a Euro 6 emissions standard as the minimum standard for taxis and PHC applications and renewals with effect from 1 December 2020; and
  - 1.3.3 from 1 December 2019 to restrict the vehicle age of all new taxi and PHC licence applications or change of vehicle applications, to less than five years from date of first registration.
- 1.4 instructs the Executive Director of Place to establish a working group, consult with relevant Council Officers and representative trade bodies on a proposed timeline, and to report back to the Committee in three months' time, and;
- 1.5 refers this Report to the Transport and Environment Committee for information.

### 2. Background

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#### Licensing

- 2.1 The licensing of taxis and private hire cars (PHCs) is an optional activity in terms of the Civic Government (Scotland) Act 1982 ('the Act'). The City of Edinburgh Council passed a resolution in terms of Section 9 of the Act, to the effect that Sections 10 to 23 of the Act shall have effect throughout the city and that licences shall be required for taxis and PHCs as from 1 July 1984 ('The City of Edinburgh Taxi and Private Hire Car Driving Resolution 1983').

- 2.2 At the meeting on 24 June 2016, the Regulatory Committee ('the Committee') approved a motion by Councillor Burgess as follows:
- 2.2.1 Edinburgh has a large fleet of taxis and PHCs;
  - 2.2.2 these vehicles contribute to air pollution, air quality is poor in some areas of the city and that the age of a vehicle may be a contributory factor to the pollution it emits;
  - 2.2.3 other local authorities require taxis and PHCs to be below a certain age, but there is currently no limit to the age of taxis and PHCs in Edinburgh; and
  - 2.2.4 calling for a report on the feasibility of introducing a maximum age limit for taxis and PHCs in the city.
- 2.3 A feasibility report was presented to the Committee on 21 November 2016. The Committee:
- 2.3.1 Agreed in principle that conditions of licences will be altered to improve the air quality in the city by reducing the emissions from taxis and PHCs and to consult on options to achieve this by either
    - (i) introducing an age limitation in respect of taxis and PHCs, or;
    - (ii) increasing incrementally the minimum emissions standards for the engines in these vehicles, which would improve emissions standards; and
  - 2.3.2 instructed the Executive Director of Place to consult with the relevant officers, the public and the taxi trade and to report back to the Committee in six months' time.
- 2.4 An online consultation was published on the Council's website and responses were invited. The consultation ran from 21 April 2017 until 2 June 2017. For consultation responses see Appendices 3, 4 and 5.
- 2.5 In terms of the Act, when granting or renewing a licence, in addition to any mandatory or standard conditions to which the licence is subject, the licensing authority may (a) disapply or vary any standard conditions so far as is applicable to the licence; and (b) impose conditions. These conditions shall be such reasonable conditions as the licensing authority thinks fit.
- 2.6 The Council currently licenses 1316 taxis and 1776 PHCs. The number of taxi licences is limited to 1316 in accordance with Council policy in respect of unmet demand for taxi services. There is no restriction on the number of PHC licences. The Scottish Government has not yet issued guidelines concerning the overprovision of PHC vehicles, and the Council would therefore be required to consult before adopting an overprovision policy.
- 2.7 Council policy states that taxis are required to comply with the 'General Construction Licensing Conditions Schedule A – Conditions of Fitness of Taxis' and PHCs are required to comply with the 'General Construction Licensing Conditions Schedule B – Conditions of Fitness of Private Hire Cars' (Appendices 1 and 2).

These conditions do not currently limit the age or prescribe the Euro Emission Standard of taxis or PHCs.

### **Hire Car Fleet – Euro Standards**

- 2.7 The Euro Standard of the current hire car fleet is shown below. The figures in brackets show the Euro Standard of the hire car fleet when this matter was first reported to the Committee on 21 November 2016.

<b>Standard</b>	<b>Applicable from</b>	<b>No. licensed taxis</b>	<b>No. licensed PHCs</b>
Euro 6	Sept 2015	324 (619 combined E5/6)	246 (582 combined E5/6)
Euro 5	January 2012	325 (see above)	619 (see above)
Euro 4	January 2006	308 (385)	806 (748)
Euro 3	January 2001	208 (180)	105 (51)
Euro 2	January 1997	151 (138)	0 (0)

- 2.8 A breakdown of Euro 5 and Euro 6 compliant vehicles was not carried out in November 2016 therefore a combined figure is shown for comparison for both taxis and PHCs respectively.
- 2.9 The number of taxis complying with Euro Standard 5/6 has increased by 30 vehicles over the year. The number of taxis at Euro Standard 4 has decreased by 77 vehicles while the number of taxis at Euro Standard 3 and 2, the most polluting vehicles, has increased by 41 vehicles from 318 licensed taxis to 359 licensed taxis. The total number of licensed taxis has remained constant.
- 2.10 The number of licensed PHCs has increased from 1,381 licensed vehicles in November 2016 to 1,776 licensed vehicles. The number of PHCs complying with Euro Standard 5/6 has increased by 283 vehicles over the year. The number of PHCs at Euro Standard 4 has increased by 58 vehicles while the number of PHCs at Euro Standard 3 has increased by 54. There are no licensed PHCs at Euro Standard 2.

### **Air Quality Standards**

- 2.11 Each local authority in the UK is obliged to carry out continuous assessment of air quality in its area by measuring air pollution, in an attempt to predict how it will change in coming years. This is to ensure that the UK air quality objectives (AQO) will be achieved by the relevant deadlines. If the assessment process identifies

areas which fail to meet the objectives, an Air Quality Management Area (AQMA) must be declared.

2.9 AQMAs have been declared at five areas in Edinburgh:

- City centre
- St John's Road (Corstorphine)
- Great Junction Street (Leith)
- Glasgow Road (A8) at Ratho Station
- Inverleith Row/Ferry Road.

2.10 The Council's Sustainable Energy Action Plan (SEAP) aims to reduce carbon emissions across the city by 42% by 2020. Transport emissions in the city accounted for 21% of all emissions in 2012. The Sustainable Transport programme within the SEAP aims to support the work of the Council's Local Transport Strategy 2014–19, by developing initiatives specifically aimed at reducing carbon emissions from transport. The SEAP aims to substantially increase the number of low-emission vehicles in the city.

2.11 The Council has recently proposed that it will take a lead role and work with the Scottish Government towards progressing the creation of Scotland's first Low Emission Zone (LEZ) in Edinburgh. The Scottish Government's current Programme for Government states that "...with the help of local authorities, we will identify and put in place the first LEZ by 2018...". The written representation from the Council's Planning and Transport Spatial Policy Team gives further information (Appendix 5).

2.12 The Council is currently developing the City of Edinburgh Council Electric Vehicle (EV) Framework to highlight its role in developing the electric vehicle agenda in the city and to ensure there is a coordinated approach within the Council. A key aim of the EV Framework is to build upon the significant progress that has been made in Edinburgh in terms of plug-in vehicle adoption and installation of EV charging infrastructure.

2.13 Council strategies and policies, in place or under development, will affect and inform the nature and content of any policy aiming to limit the tailpipe emissions of taxis and private hire cars.

### **3. Main report**

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3.1 A number of other licensing authorities currently restrict the maximum age of a vehicle for which a taxi or PHC licence can be granted (Appendix 7). The previous [Feasibility Report](#) to the Committee dated 21 November 2016 provides a comprehensive summary of other Scottish licensing authorities' policies and practice.

## Consultation

- 3.2 There were a total of 718 responses submitted to the Council's Online Consultation Hub survey (Appendix 3). A number of respondents did not answer all of the questions contained in the survey. Additionally, a further nine written responses were received (Appendix 5). The volume of replies took a significant period to analyse.
- 3.3 The online responders were sub-divided into distinct groups as shown below:

<b>Group</b>	<b>No. responses</b>
Edinburgh Taxi Drivers	151
Edinburgh PHC Drivers	254
Edinburgh Taxi Owners	162
Edinburgh PHC Owners	197
Taxi Driver/Owners from other licensing authorities	4
PHC Drivers/Owners from other licensing authorities	11
Taxi/PHC Associations	7
Training Providers	3
Other businesses	14
Members of the public	134
Other/not answered	14

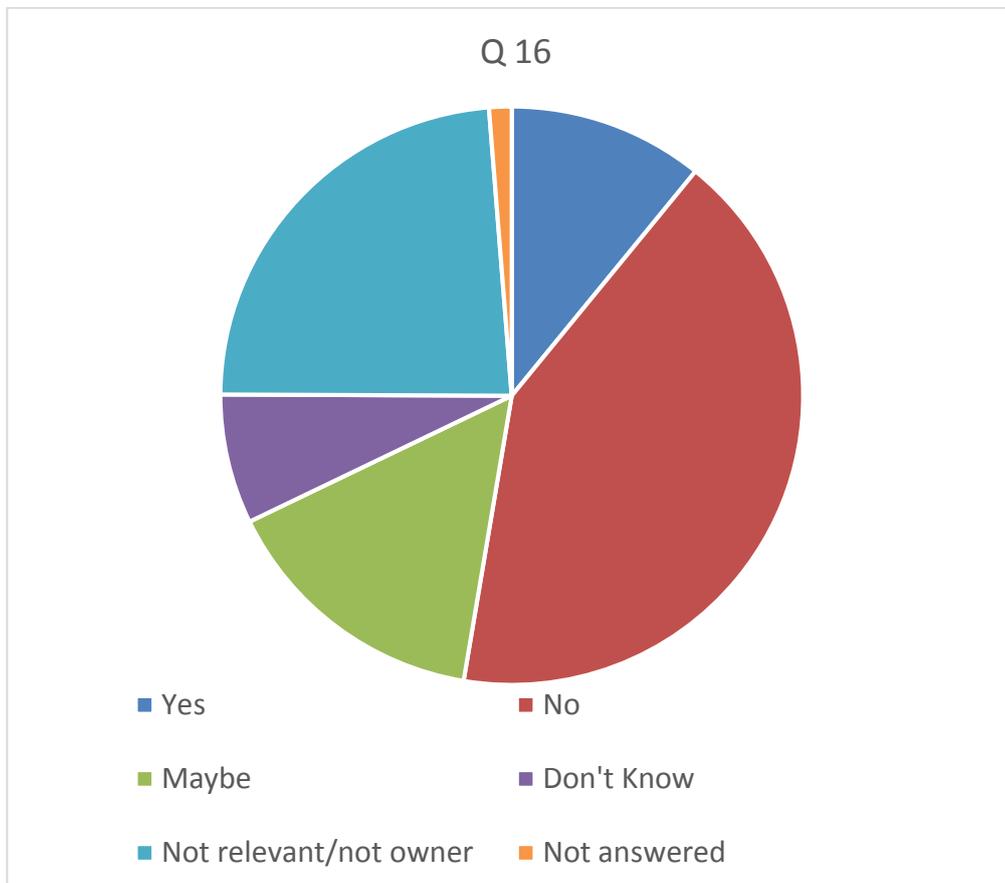
- 3.4 Some respondents have described themselves as belonging to more than one category e.g. as both a taxi driver and as a taxi owner. Full results of the consultation are contained in Appendices 3, 4 and 5.
- 3.5 Written representations (Appendix 5) were received from
- The City of Edinburgh Council – Spatial Policy Team Transport & Planning;
  - The Energy Savings Trust;
  - The London Taxi Company Ltd;
  - Transport for Edinburgh;
  - Uber;

- Scotrail;
- City Cabs (Edinburgh) Ltd;
- Central Taxis (Tollcross) Ltd;
- United Private Hire Drivers (Edinburgh).

- 3.6 The consultation made several suggestions, and respondents were asked to indicate their feelings about each. Where a question was not answered this was also recorded. Questions 1, 2 and 3 recorded the name, email address and organisation of the respondent.
- 3.7 **Question 4:** Do you agree that the City of Edinburgh Council should consider adopting a maximum/minimum age of licensed vehicle policy?
- 413 respondents (58%) disagreed.
- 3.8 **Question 5:** Do you agree that the City of Edinburgh Council should consider setting minimum emissions standards for vehicles to improve air quality?
- 444 respondents (62%) agreed.
- 3.9 **Question 6:** To address concerns about air pollution, should we adopt a maximum age of vehicles, adopt the Euro Emissions Standards, or both?
- In relation to taxis: 358 respondents (49.86%) elected to adopt the Euro Emissions Standards and a further 195 respondents (27.16%) elected to adopt both a maximum age of vehicle and a Euro Emission Standards.
  - In relation to PHCs: 325 respondents (45.26%) elected for the Euro Emissions Standards and a further 243 respondents (33.84%) elected to adopt both a maximum age of vehicle and a Euro Emission Standards.
- 3.10 **Question 7:** Do you agree that we should have the same maximum age policy for both taxis and PHCs?
- A slight majority of respondents (390: 54.32%) agreed that there should be the same maximum age policy for both taxis and PHCs.
- 3.11 **Question 8:** If the maximum age of the vehicle is adopted as a limiting factor – at what age should that be set for existing licensed vehicles?
- Respondents were given options of 3, 5, 7 or 10 years or to suggest another age limit and were given the opportunity to identify at what age that limit should be set.
  - No clear view emerged in relation to this question.
- 3.12 **Question 9:** If Euro Emissions Standards are adopted as a limiting factor – what should be the minimum standard?
- Respondents were given options of Euro 4, Euro 5 or Euro 6 – Euro 6 being the most up-to-date Euro Emissions Standard.

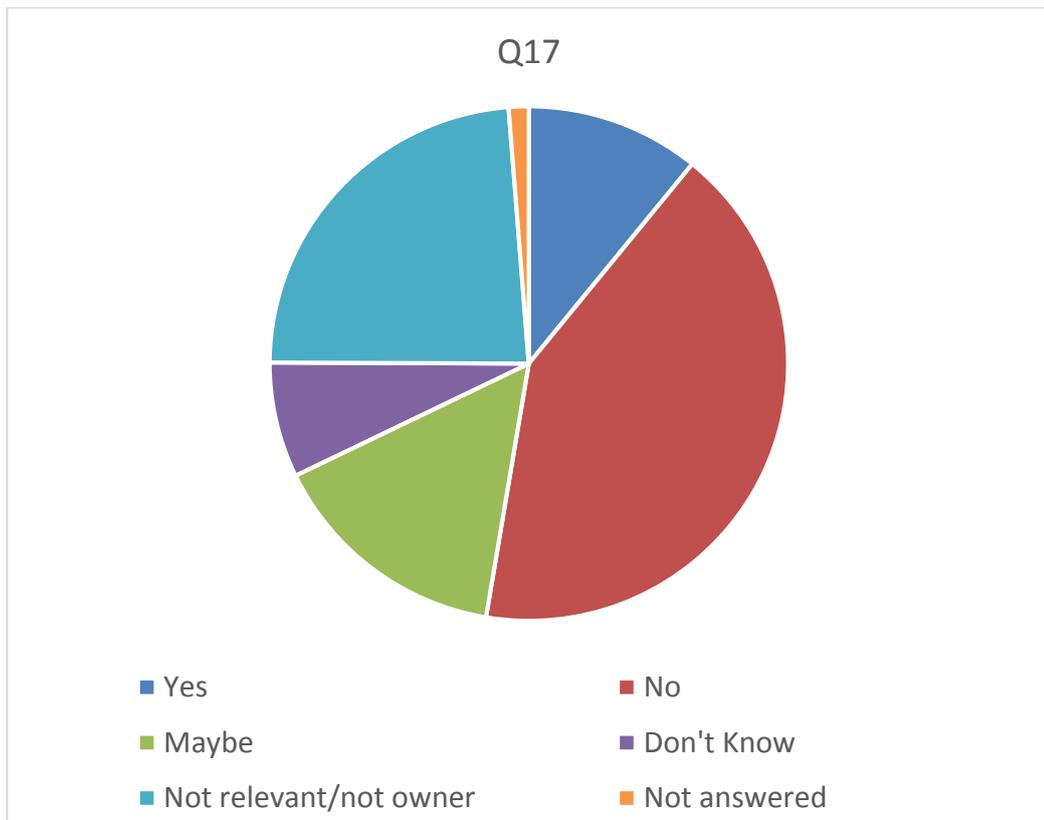
- Most support emerged for Euro 5 in the cases of both Taxis and PHCs
    - Taxis – 282 (39%) favoured Euro 5
    - PHCs – 269 (37%) favoured Euro 5
- 3.13 **Question 10:** Do you agree that all vehicles at time of application for a new vehicle licence, including applications for replacement vehicles, must be less than three years old at the time of application?
- In relation to taxis 479 respondents (66.71%) disagreed
  - In relation to PHCs 396 respondents (55.15%) disagreed.
- 3.14 **Question 11:** Do you agree that the City of Edinburgh Council should allow existing licensed taxis or licensed PHCs to continue to be licensed regardless of age, if the vehicle complies with the conditions of fitness?
- 526 respondents (73%) agreed.
- 3.15 **Question 12:** Do you agree that any changes to the policy should remove the oldest vehicles that emit the highest levels of pollution first?
- 499 respondents (69%) agreed.
- 3.16 **Question 13:** Do you agree that new vehicle licences should only permit an electric vehicle from an approved list (where available)?
- 487 respondents (68%) disagreed.
- 3.17 **Question 14:** Do you agree that older vehicles (5+ yrs) should have to have more than one inspection per year to allow for an increased frequency of emissions and roadworthiness testing?
- In respect of taxis 487 respondents (68%) disagreed.
  - In respect of PHCs 416 respondents (58%) disagreed.
- 3.18 **Question 15:** Do you agree that diesel engine PHCs should be phased out and no replacement diesel engine PHCs should be allowed?
- 416 respondents (58%) disagreed.

3.19 **Question 16:** If you are a vehicle owner, would any of the proposed changes to licensing policy require you to replace your vehicle(s)? If you are not a vehicle owner please select 'Not a vehicle owner'.



- Yes 300
- No 157
- Not a vehicle owner 239
- Not answered 22

3.20 **Question 17:** The cost of buying a new taxi or private hire vehicle is likely to be substantial. If you are a licensed vehicle owner or driver, would you consider renting or hiring a vehicle as an alternative to buying one?



- Yes 78
- No 300
- Maybe 109
- Don't know 52
- Not relevant/not owner 170
- Not answered 9

3.21 **Question 18:** If you answered no to the last question, what was your reason for saying no?

- There were 292 responses to this question. These are included in Appendix 4.

3.22 **Question 19:** Do you agree that Edinburgh should aim for all its licensed taxi and private hire vehicles to be zero-emission vehicles by 2030?

- A total of 360 respondents (50.14%) agreed.

- 3.23 **Question 20:** Is there anything that you think the City of Edinburgh Council or the Scottish Government can do to help vehicle owners to drive cleaner, less polluting vehicles or to reduce levels of air pollution in the city?
- There were 478 responses to this part of the question. These are included in Appendix 4.
- 3.24 **Question 21:** Please use the space below for any additional information, comments or suggestions about the proposed age limitation for taxis and private hire cars that you have not said so far.
- There were 230 responses to this part of the question. These are included in Appendix 4.
- 3.25 Written comments, linked to the online questions 8, 18, 20 and 21 included in Appendix 4 include the concerns and perceived concerns of the respondents, particularly those within the trade.
- 3.26 Within the written comments, the main areas of concern associated with the introduction of the policy include:
- Subsidies and/or financial support to change vehicle.
  - PHCs access to Greenways.
  - Restrictions on the number of PHC licences.
  - Council policies/practices allegedly contributing to congestion/pollution – e.g. 20 mph speed limit, traffic calming measures, etc.
  - Concerns regarding the relative cost, including depreciation, of a purpose built wheelchair accessible taxi versus a PHC.
  - The available charging infrastructure within the city.
  - The use of alternative and public transport.
  - The Council E.V. fleet.
- 3.27 A number of the issues outlined above do not fall within the remit of Licensing but are within the remit of the Council. Some reflect trade concerns regarding cost implications, without appreciating the air quality improvement objective.

#### **Subsidies and/or financial support to change vehicle**

- 3.28 Reference to the need for subsidies or financial support featured in 191 responses. The Scottish Government provides funding in the form of interest free loans of up to £100,000 to replace taxis which are more than eight years old with new, efficient Euro 6 models and to replace diesel taxis, regardless of age, with ULEV taxis. Additionally, grant funding of up to 100% is available to support the introduction of charging infrastructure for electric and plug-in hybrid vehicles. See attached correspondence from the Energy Saving Trust (Appendix 5).

#### **Proposal to allow PHCs access to Greenways**

- 3.29 While this is not a matter for this Committee (it falls within the remit of Transport Planning), it was mentioned in 149 comments. It is recommended that this matter is

referred to officers within Transport Planning for consideration at the conclusion of this process.

### **Requests to restrict the number of PHC licences**

- 3.30 The suggestion that the Council should restrict the number of PHC licences it grants in order to limit the number of licensed vehicles was made in 81 comments. This matter is included elsewhere on the committee work plan. Authority to limit the number of PHC licences was introduced by a recent amendment to the legislation however, licensing authorities are awaiting policy guidance to be issued by the Scottish Government.

### **Concerns regarding other Council policies/practices contributing to congestion /pollution**

- 3.31 67 comments regarding other Council policies and/or practices were made. These included attributing increased pollution due to the introduction of the 20 mph restriction on some roads, the phasing of some traffic signals, road works, speed control bumps and restricted traffic flows.

### **Concerns regarding the relative cost, including depreciation, of a purpose built wheelchair accessible taxi versus a PHC**

- 3.32 51 comments were made regarding the comparative cost of a wheelchair accessible taxi and a saloon car suitable for use as a PHC; the relative depreciation of such vehicles and the second hand resale opportunities for taxis.

### **Concerns regarding the available E.V. charging infrastructure within the city**

- 3.33 29 comments were made regarding the need for or the lack of a comprehensive E.V. charging infrastructure within the city suitable for use by the hire car trade which was seen as an obstacle to the introduction of E.V's as hire cars.

### **Comment regarding the Council E.V. fleet**

- 3.34 Although mentioned in only 16 comments, these referred to the Council proposing to restrict the age and emissions of hire cars while allegedly failing to address emissions by its own fleet and partnership companies (e.g. Transport for Edinburgh buses).

### **Conclusions**

- 3.35 While there is limited support for an age limitation of vehicles, there is support for the introduction of a minimum emission standard for hire cars to improve air quality in the city.
- 3.36 Together with the matters highlighted in paragraphs 3.26 – 3.32 above, Council Officers are aware of the following issues which have been highlighted by the hire car trade: the availability of a serviceable and sustainable electric vehicle charging infrastructure across the city; the impact of the expansion of the licensed PHC fleet leading to more vehicles/drivers seeking hires and; the cost implications of renewing older vehicles to meet any emissions standards set by a new policy, and

the period of time over which any policy would take effect, for consideration in the implementation of any policy.

- 3.37 Responses to these matters and additional information from appropriate Council teams concerning the issues relating to Electric Vehicle Chargers, traffic management including the 20 mph limit, and the Council's electric vehicle fleet; are included in Appendix 6.
- 3.38 The Council is currently developing its Electric Vehicle Framework which will involve collaborative support internally from Transport, Planning, Economic Development, Fleet Services, Parking Services and the Licensing Service. This will help enable a more strategic and co-ordinated network of Rapid and Fast Charging infrastructure across Edinburgh; also, a comprehensive review of demand for taxi services has been undertaken; the matter of overprovision of PHC services will be considered once the Scottish Government has issued its guidance, and subsidies, interest free loans and grant funding are available from the Scottish Government to individuals purchasing electric vehicles or installing charging infrastructure.
- 3.39 The Committee is asked to note the concerns expressed by the trade regarding
- the cost of replacement vehicles;
  - the potential financial impact on fares, and;
  - to factor in any effect on taxi and PHC numbers.
- 3.40 It is recommended that the Committee agrees the following:
- 3.40.1 to implement a Euro 5 emissions standard as the minimum standard for both taxi and PHC licence applications and renewals with effect from 1 December 2018;
- 3.40.2 thereafter, to introduce a Euro 6 emissions standard as the minimum standard for taxis and PHC applications and renewals with effect from 1 December 2020;
- 3.40.3 from 1 December 2019 to restrict the vehicle age of all new taxi and PHC licence applications or change of vehicle applications, to less than three years from date of first registration, and;
- 3.40.4 to instruct officers to engage with relevant bodies on the proposed timeline.
- 3.41 The adoption and implementation of a policy to achieve improvements in the tailpipe emissions of licensed hire cars will require liaison and consultation within the Council between the Licensing Department and relevant departments with responsibility for policy in respect of air quality, traffic management, transport planning and environmental health and, externally between the Council and the wider hire car trade including licence holders, manufacturers and suppliers and it is recommended that a working group is established to implement the recommendations of this report.

## **4. Measures of success**

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- 4.1 That the standard of the licensed hire fleet is maintained at a level that is to be expected in the capital city, delivering improvements that:
- Improve air quality;
  - reduce carbon emissions;
  - contribute to meeting UK air quality objectives (AQO) and;
  - provide safe and efficient transport options for residents and visitors.

## **5. Financial impact**

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- 5.1 None arising from this report. The Council's scale of fees for licensing applications was approved with effect from 1 April 2017. Any costs implementing policy changes will be contained within the current ring-fenced income generated from licence application fees.

## **6. Risk, policy, compliance and governance impact**

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- 6.1 The development of policy in respect of the licensing of taxis and private hire cars is part of the wider policy-making role for the Council. It is essential that all strategic aims of the Council are considered and that where appropriate the taxi and private hire car licensing policy is consistent with these aims.
- 6.2 There is risk that any decision to amend or change existing licence conditions could be subject to legal challenge and may be appealed to the Sheriff.
- 6.3 Air Quality Management Areas have been declared at 5 areas across the city where air quality assessment has identified that UK air quality objectives (AQO) are not being met.

## **7. Equalities impact**

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- 7.1 The contents and recommendations neither contribute to, nor detract from, the delivery of the three Public Sector Equality Duties.
- 7.2 The contents and recommendations described in this report do not deliver any outcomes relating to the ten areas of rights, nor do they enhance or infringe them.

## **8. Sustainability impact**

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- 8.1 This will reduce the carbon footprint of the taxi and private hire car trade within the city and contribute to the Council's Sustainable Energy Action Plan to reduce carbon emissions across the city by 42% by 2020.

## 9. Consultation and engagement

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- 9.1 Representatives from the taxi and private hire car trade were consulted at a meeting of the Hire Car Consultation Group on 4 October 2016 and February 2017.
- 9.2 An online consultation was published on the Council's Consultation Hub between 21 April 2017 and 2 June 2017 during which time 718 online responses were received.
- 9.3 Trade representatives were invited to make such written representations as they saw fit and, where made, these have been included in this report.

## 10. Background reading/external references

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- 10.1 None

### **Andrew Mitchell**

Regulatory Services Manager

Andrew Mitchell, Regulatory Services Manager

E-mail: [Andrew.mitchell@edinburgh.gov.uk](mailto:Andrew.mitchell@edinburgh.gov.uk) | Tel: 0131 469 5822

Terry Higgins, Licensing Regulatory Officer

E-mail: [Terence.higgins@edinburgh.gov.uk](mailto:Terence.higgins@edinburgh.gov.uk) | Tel: 0131 529 4250

## 11. Appendices

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- 11.1 Appendix 1 – Licence Conditions Schedule A: Fitness of Taxis
- 11.2 Appendix 2 – Licence Conditions Schedule B: Fitness of PHCs
- 11.3 Appendix 3 – Online Consultation Results
- 11.4 Appendix 4 – Respondent's Online Comments
- 11.5 Appendix 5 – Written Consultation Responses
- 11.6 Appendix 6 - Additional Information – E.V. Chargers, Traffic Control & Council E.V. Fleet
- 11.7 Appendix 7 – Other Local Authority Taxi/PHC Age Limitations

## Appendix 1- Extract of Taxi Licence Conditions

### SCHEDULE A

#### CONDITIONS OF FITNESS OF TAXIS

##### General Construction

- 184 Taxis in Edinburgh must be a motor vehicle of a type or model which holds a valid European Whole Vehicle Type Approval as an M1 vehicle, is purpose built for use as a taxi and must comply in all respects with the requirements of any Acts and Regulations relating to motor vehicles.
- 185 All taxis in Edinburgh must be readily wheelchair accessible.
- 186 The bodywork, bonnet and wings must be free from any dents or other irregularities, properly painted or cellulosed and the paintwork properly smoothed down and polished.
- 187 There must be carried on every vehicle:
- (a) A spare wheel fitted with a pneumatic tyre of the same type and size as the other tyres on the vehicle and in efficient condition and ready instantly to replace any wheel on which the tyre has become damaged, or any damaged wheel; and
  - (b) A suitable lifting jack; and
  - (c) A suitable wheel brace.
- 186 As an alternative to a spare wheel the Council will accept breakdown cover. Evidence that such cover is in place must be produced to the Council or Cab Inspector.
- 202A Subject to inspection and testing by the Taxi Examination Centre, taxis may use electricity as a means of propulsion including its use with any hybrid engine.

## **Appendix 2 – Extract of Private Hire Car Licence Conditions**

### **SCHEDULE B**

#### **CONDITIONS OF FITNESS OF PRIVATE HIRE CARS**

##### **General Construction**

- 241 Every private hire car must comply in all respects with the requirements of any Acts or Regulations relating to motor vehicles in force at the time of licensing.
- 242 The vehicle, including all bodywork, upholstery and fittings must be in good and serviceable condition.
- 243 The vehicle must be of suitable size and design so that it is capable of withstanding the loads and stresses likely to be met within service.
- 244 The vehicle must have an engine capacity with a 'power to weight' ratio equal to or greater than 0.0648 hp per kg.
- 245 The bodywork, bonnet and wings must be free from any dents or other irregularities, properly painted or cellulosed and the paintwork properly smoothed down and polished. As an alternative to paintwork, a single colour vinyl wrap may be applied and the materials used must be of a quality not easily defaced or detached. Where a vehicle is finished in this way it shall not be used as a private hire car until the final finish has been examined and approved by the Cab Inspector.
- 246 The vehicle must have not less than 4 wheels.
- 247 There must be carried on every vehicle:
- (a) A spare wheel fitted with a pneumatic tyre of the same type and size as the other tyres on the vehicle or a vehicle manufacturer's supplied space saver spare wheel in efficient condition and ready instantly to replace any wheel on which the tyre has become damaged, or any damaged wheel; and
  - (b) A suitable lifting jack; and
  - (c) A suitable wheel brace.
- 248 As an alternative to a spare wheel the Council will accept breakdown cover. Evidence that such cover is in place must be produced to the Cab Inspector or Authorised Officer.
- 256A Subject to inspection and testing by the Taxi Examination Centre, Private Hire Cars may use electricity as a means of propulsion including its use within any hybrid engine.

## **Appendix 3 – Online Consultation Results**

## Age Limitation of Taxis and Private Hire Cars (Air Quality): Summary report

This report was created on Tuesday 06 June 2017 at 12:54.

The consultation ran from 21/04/2017 to 02/06/2017.

### Contents

<b>Question 1: What is your name?</b>	<b>2</b>
Name	2
<b>Question 2: What is your email address?</b>	<b>2</b>
Email	2
<b>Question 3: What is your organisation?</b>	<b>2</b>
Organisation	2
<b>Question 4: Do you agree that the City of Edinburgh Council should consider adopting a maximum/minimum age of licensed vehicle policy?</b>	<b>3</b>
adopt age policy?	3
<b>Question 5: Do you agree that the City of Edinburgh Council should consider setting minimum emissions standards for vehicles to improve air quality ?</b>	<b>3</b>
set minimum standard?	3
<b>Question 6: To address concerns about air pollution, should we adopt a maximum age of vehicles, adopt the Euro Emission Standards, or both?</b>	<b>4</b>
max age or Euro emissions - Taxis	4
max age or Euro emissions - PHCs	4
<b>Question 7: Do you agree that we should have the same maximum age policy for both taxis and PHCs?</b>	<b>5</b>
same max age for taxis and phcs	5
<b>Question 8: If the maximum age of the vehicle is adopted as a limiting factor – at what age should that be set for existing licensed vehicles?</b>	<b>5</b>
what age? - Taxis	5
what age? - PHCs	6
Please enter text	6
<b>Question 9: If Euro Emissions Standards are adopted as a limiting factor - what should be the minimum standard?</b>	<b>6</b>
Which Euro standard? - Taxis	6
Which Euro standard? - PHCs	7
<b>Question 10: Do you agree that all vehicles at time of application for a new vehicle licence, including applications for replacement vehicles, must be less than three years old at the time of application?</b>	<b>7</b>
new app- must be less than 3 - Taxis	7
new app- must be less than 3 - PHCs	8
<b>Question 11: Do you agree that the City of Edinburgh Council should allow existing licensed taxis or licensed PHCs to continue to be licensed regardless of age, if the vehicle complies with the conditions of fitness?</b>	<b>8</b>
existing can continue if complies with CoP	8
<b>Question 12: Do you agree that any changes to the policy should remove the oldest vehicles that emit the highest levels of pollution first?</b>	<b>9</b>
oldest first?	9
<b>Question 13: Do you agree that new vehicle licences should only permit an electric vehicle from an approved list (where available)?</b>	<b>9</b>
Taxis/PHCs new electric only? - Taxis	9
Taxis/PHCs new electric only? - PHCs	10
<b>Question 14: Do you agree that older vehicles (5+ yrs) should have to have more than one inspection per year, to allow for an increased frequency of emissions and roadworthiness testing?</b>	<b>10</b>
more inspections for older - Taxis	10
more inspections for older - PHCs	11
<b>Question 15: Do you agree that diesel engine PHCs should be phased out and no replacement diesel engine PHCs should be allowed?</b>	<b>11</b>
Phase out diesel PHCs	11
<b>Question 16: If you are a vehicle owner, would any of the proposed changes to licensing policy require you to replace your vehicle(s)? If you are not a vehicle owner please select 'Not a vehicle owner'.</b>	<b>12</b>
Vehicle update needed?	12
<b>Question 17: The cost of buying a new taxi or private hire vehicle is likely to be substantial. If you are a licensed vehicle owner or driver, would you consider renting or hiring a vehicle as an alternative to buying one?</b>	<b>12</b>

Hire?	12
<b>Question 18: If you answered no to the last question, what was your reason for saying no?</b>	<b>13</b>
why not hire?	13
<b>Question 19: Do you agree that Edinburgh should aim for all of its licensed taxi and private hire vehicles to be zero-emission vehicles by 2030?</b>	<b>13</b>
zero by 2030?	13
<b>Question 20: Is there anything that you think the City of Edinburgh Council or the Scottish Government can do to help vehicle owners to drive cleaner, less polluting vehicles or to reduce levels of air pollution in the city?</b>	<b>13</b>
anything else to help reduce pollution?	13
<b>Question 21: Please use the space below for any additional information, comments or suggestions about the proposed age limitation for licensed taxis and private hire cars that you have not said so far.</b>	<b>13</b>
Additional information, comments or suggestions	13
<b>Question 22: Are you:</b>	<b>14</b>
Who are you?	14
More information about respondent	14
<b>Question 23: Which age group applies to you?</b>	<b>15</b>
Age bracket	15
<b>Question 24: What is your gender?</b>	<b>16</b>
Gender	16
<b>Question 25: What religion, religious denomination or body do you belong to?</b>	<b>17</b>
Religion	17
if you answered 'Other' please specify	17
<b>Question 26: What is your sexual orientation?</b>	<b>18</b>
Sexuality	18
<b>Question 27: What is your ethnic group? (Choose ONE section from A to E, then tick ONE box which best describes your ethnic group or background)</b>	<b>18</b>
Ethnicity (A - White)	18
Other white ethnic group, please write in	18
Ethnicity (Mixed or multiple ethnic group)	19
Any mixed or multiple ethnic groups, please write in	19
Ethnicity (Asian, Asian Scottish, Asian British)	19
Other, please write in	19
Ethnicity (D - African, Caribbean or Black)	20
Other, please write in	20
Ethnicity (E - Other)	20
Other, please write in	20

**Question 1: What is your name?**

**Name**

There were 760 responses to this part of the question.

**Question 2: What is your email address?**

**Email**

There were 677 responses to this part of the question.

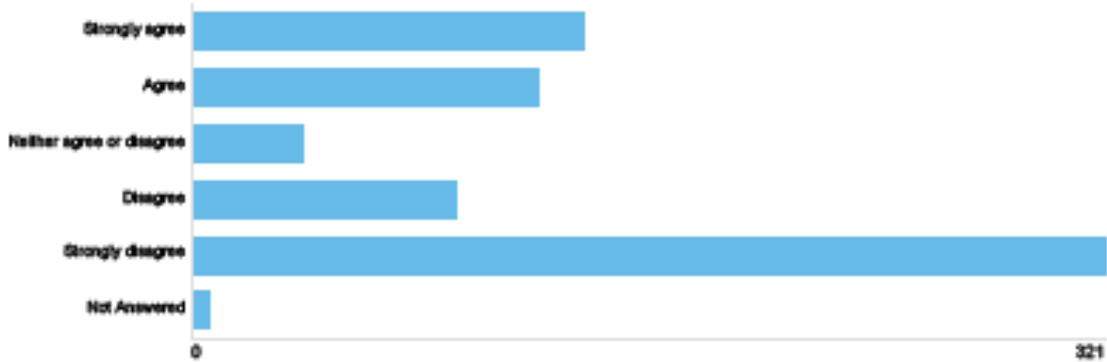
**Question 3: What is your organisation?**

**Organisation**

There were 671 responses to this part of the question.

**Question 4: Do you agree that the City of Edinburgh Council should consider adopting a maximum/minimum age of licensed vehicle policy?**

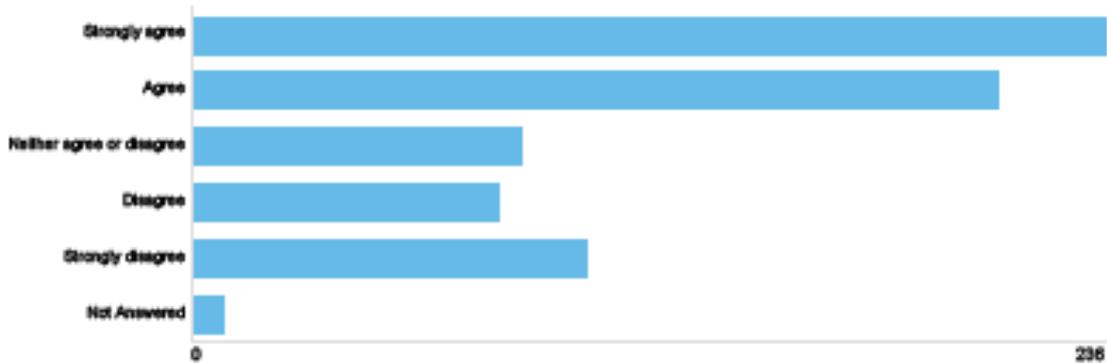
*adopt age policy?*



Option	Total	Percent
Strongly agree	138	19.22%
Agree	122	16.99%
Neither agree or disagree	39	5.43%
Disagree	92	12.81%
Strongly disagree	321	44.71%
Not Answered	6	0.84%

**Question 5: Do you agree that the City of Edinburgh Council should consider setting minimum emissions standards for vehicles to improve air quality?**

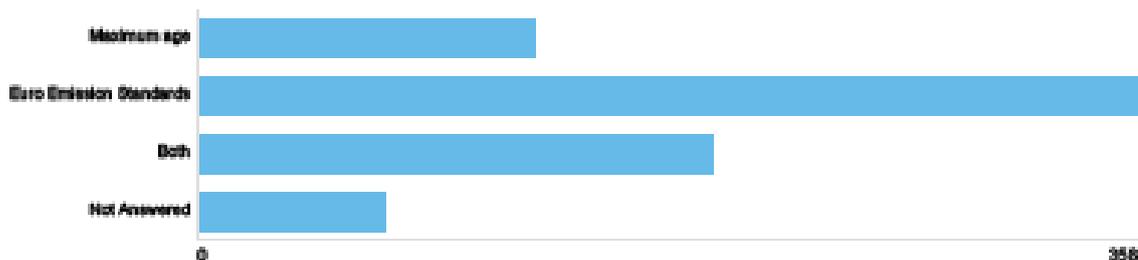
*set minimum standard?*



Option	Total	Percent
Strongly agree	236	32.87%
Agree	208	28.97%
Neither agree or disagree	65	11.84%
Disagree	79	11.00%
Strongly disagree	102	14.21%
Not Answered	8	1.11%

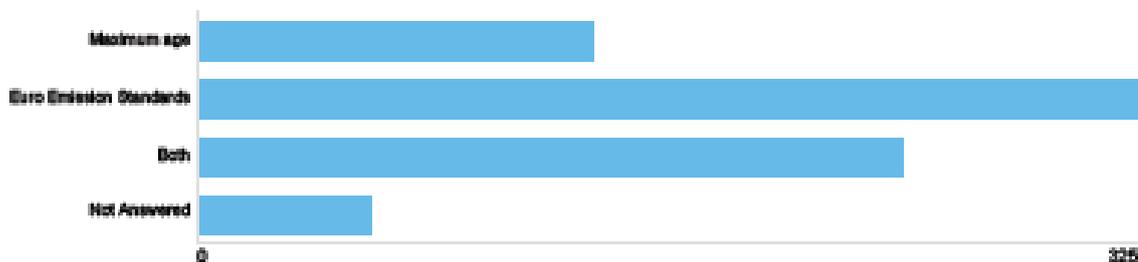
Question 6: To address concerns about air pollution, should we adopt a maximum age of vehicles, adopt the Euro Emission Standards, or both?

max age or Euro emissions - Taxis



Option	Total	Percent
Maximum age	128	17.83%
Euro Emission Standards	356	49.86%
Both	195	27.18%
Not Answered	71	9.83%

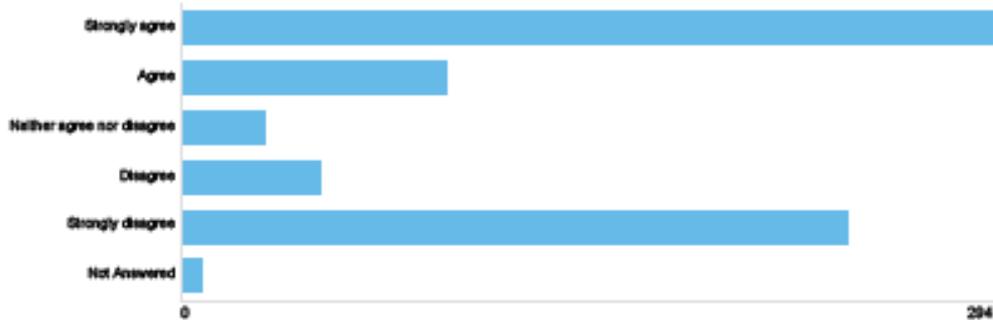
max age or Euro emissions - PHCs



Option	Total	Percent
Maximum age	138	18.94%
Euro Emission Standards	325	45.26%
Both	243	33.84%
Not Answered	59	8.22%

Question 7: Do you agree that we should have the same maximum age policy for both taxis and PHCs?

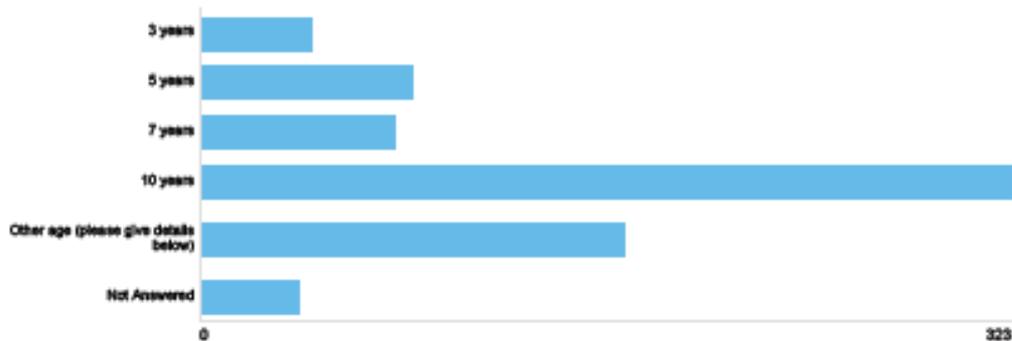
same max age for taxis and phcs



Option	Total	Percent
Strongly agree	294	40.95%
Agree	96	13.37%
Neither agree nor disagree	30	4.18%
Disagree	50	6.96%
Strongly disagree	241	33.57%
Not Answered	7	0.97%

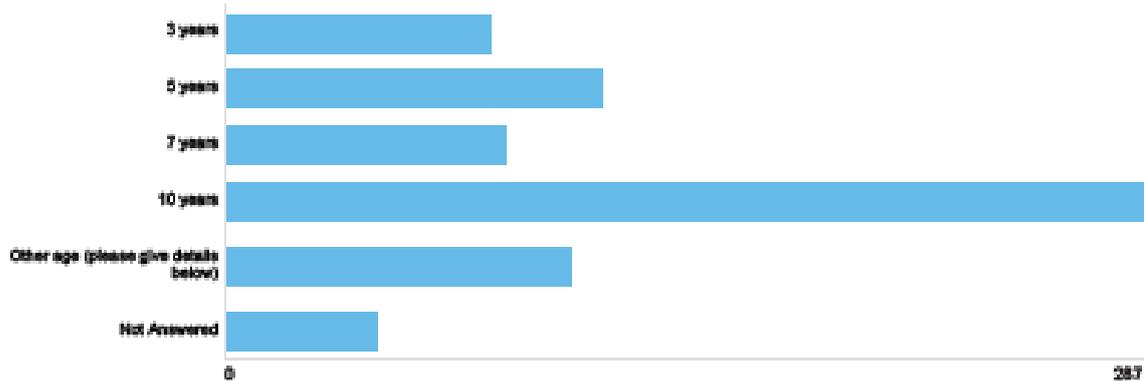
Question 8: If the maximum age of the vehicle is adopted as a limiting factor – at what age should that be set for existing licensed vehicles?

what age? - Taxis



Option	Total	Percent
3 years	44	6.13%
5 years	64	11.70%
7 years	77	10.72%
10 years	325	44.99%
Other age (please give details below)	168	23.40%
Not Answered	39	5.43%

what age? - PHCs



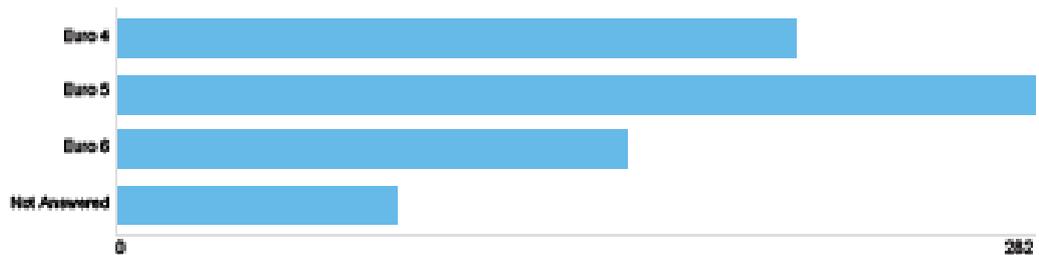
Option	Total	Percent
3 years	63	11.56%
5 years	117	18.30%
7 years	67	12.12%
10 years	287	39.97%
Other age (please give details below)	108	15.04%
Not Answered	47	6.55%

Please enter text

There were 188 responses to this part of the question.

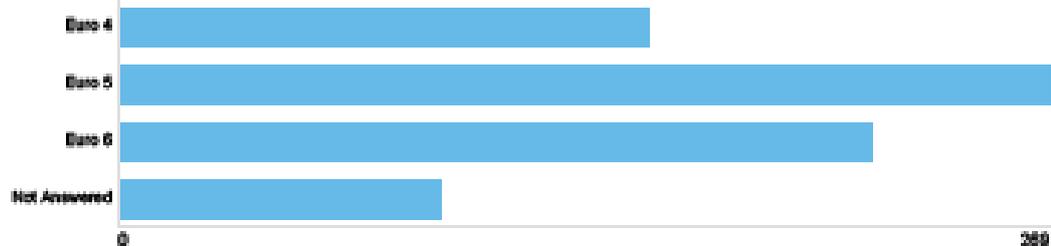
Question 3: If Euro Emissions Standards are adopted as a limiting factor - what should be the minimum standard?

Which Euro standard? - Taxis



Option	Total	Percent
Euro 4	208	28.97%
Euro 5	282	39.28%
Euro 6	157	21.87%
Not Answered	66	11.98%

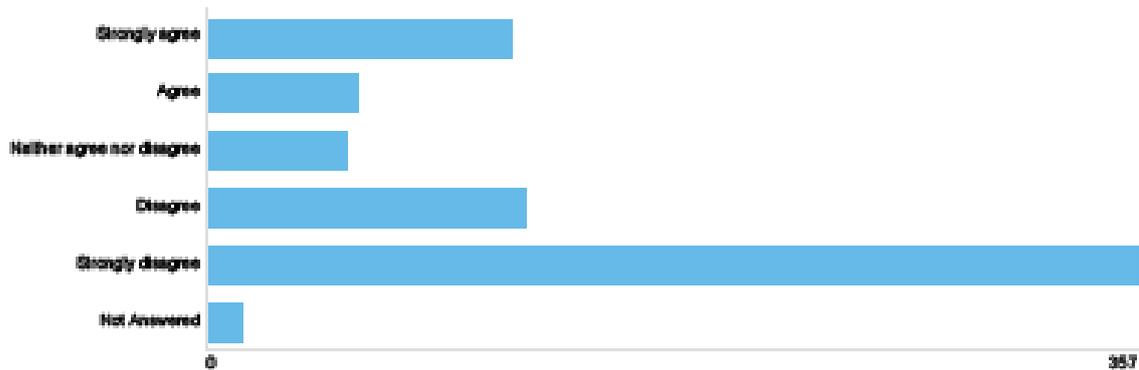
Which Euro standard? - PHCs



Option	Total	Percent
Euro 4	153	21.31%
Euro 5	269	37.47%
Euro 6	217	30.22%
Not Answered	93	12.95%

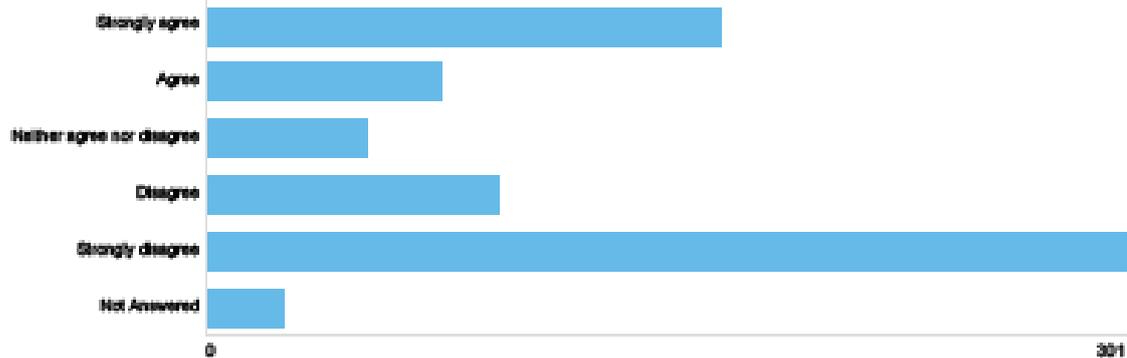
**Question 10: Do you agree that all vehicles at time of application for a new vehicle licence, including applications for replacement vehicles, must be less than three years old at the time of application?**

new app - must be less than 3 - Taxis



Option	Total	Percent
Strongly agree	118	18.16%
Agree	58	8.88%
Neither agree nor disagree	53	7.98%
Disagree	122	18.99%
Strongly disagree	357	49.72%
Not Answered	13	1.81%

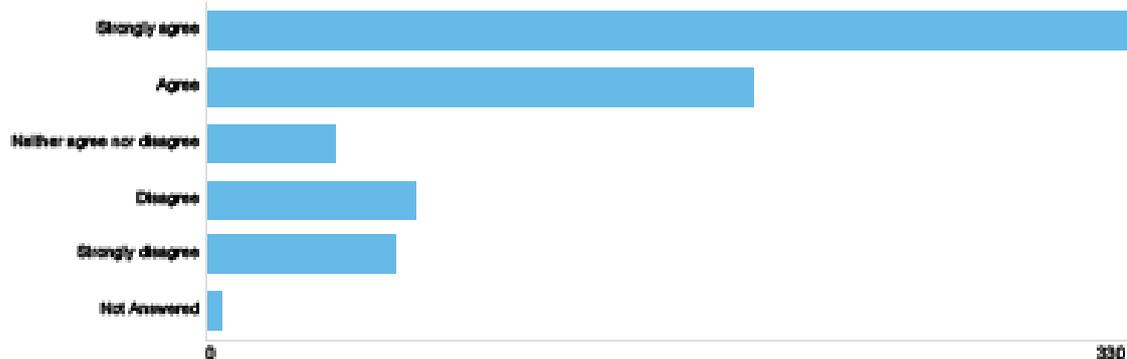
new app - must be less than 3 - PHCs



Option	Total	Percent
Strongly agree	168	23.40%
Agree	77	10.72%
Neither agree nor disagree	53	7.38%
Disagree	95	13.23%
Strongly disagree	301	41.92%
Not Answered	25	3.48%

Question 11: Do you agree that the City of Edinburgh Council should allow existing licensed taxis or licensed PHCs to continue to be licensed regardless of age, if the vehicle complies with the conditions of fitness?

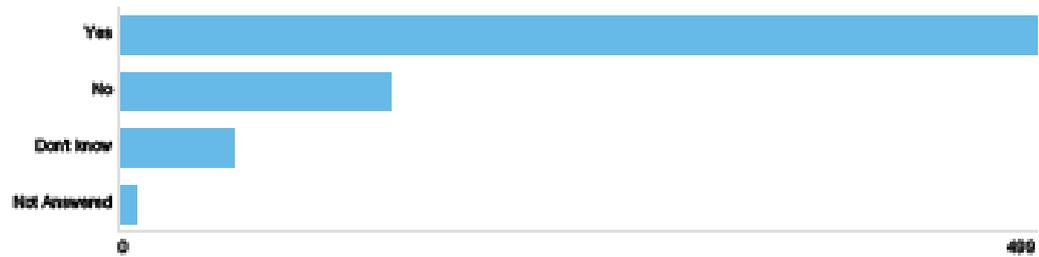
existing can continue if complies with CoF



Option	Total	Percent
Strongly agree	330	45.96%
Agree	198	27.30%
Neither agree nor disagree	48	6.41%
Disagree	74	10.21%
Strongly disagree	87	11.89%
Not Answered	5	0.70%

**Question 12: Do you agree that any changes to the policy should remove the oldest vehicles that emit the highest levels of pollution first?**

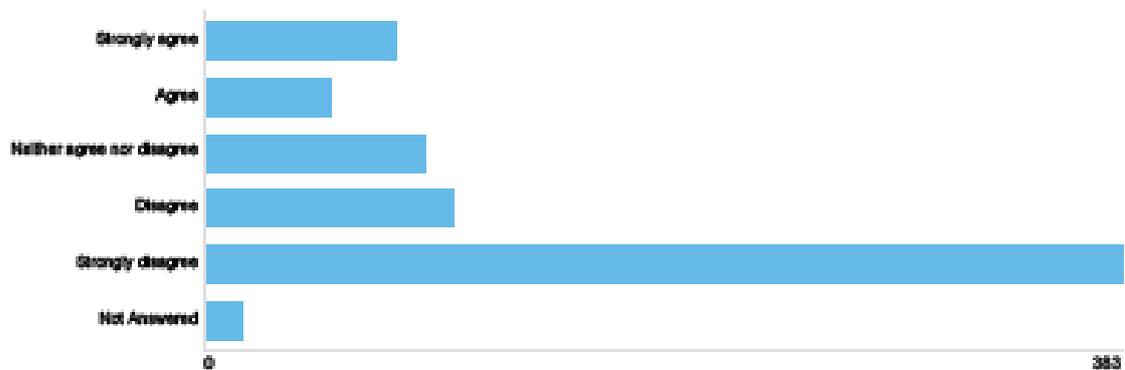
oldest first?



Option	Total	Percent
Yes	499	69.50%
No	148	20.61%
Don't know	62	8.64%
Not Answered	9	1.25%

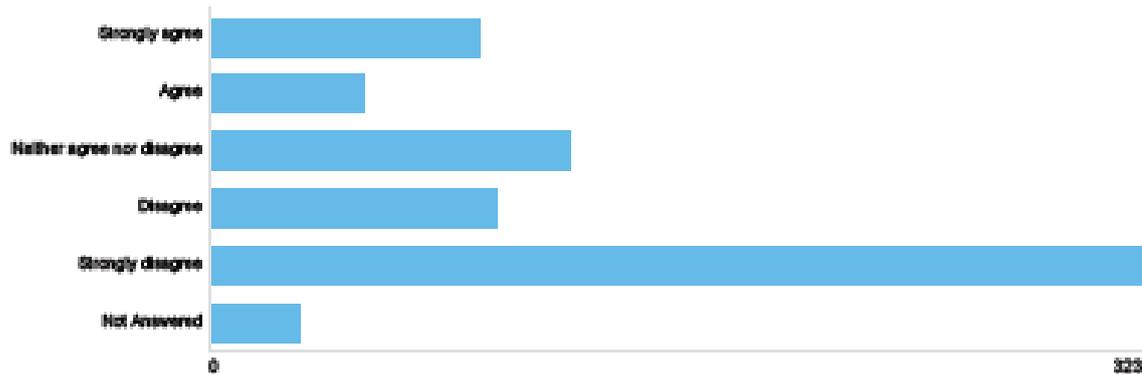
**Question 13: Do you agree that new vehicle licences should only permit an electric vehicle from an approved list (where available)?**

Taxis/PNCs new electric only? - Taxis



Option	Total	Percent
Strongly agree	80	11.14%
Agree	53	7.30%
Neither agree nor disagree	91	12.67%
Disagree	104	14.48%
Strongly disagree	383	53.34%
Not Answered	15	2.09%

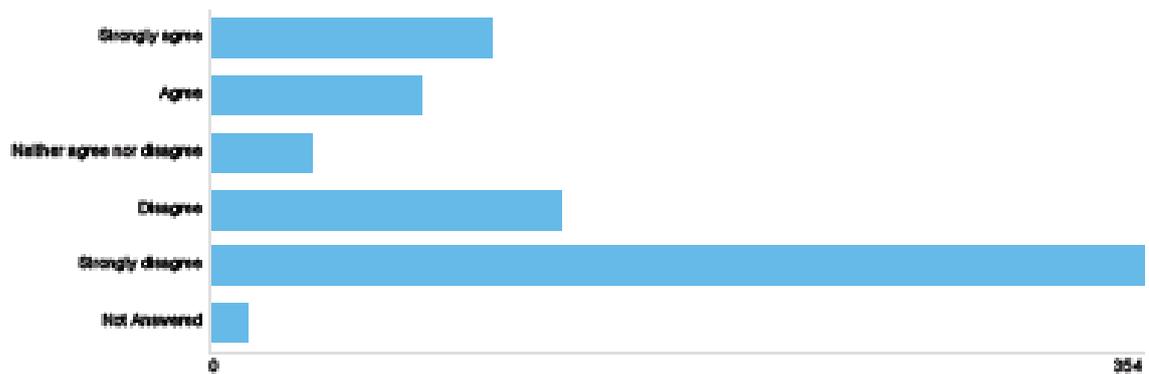
Taxis/PHCs new electric only? - PHCs



Option	Total	Percent
Strongly agree	93	12.95%
Agree	53	7.30%
Neither agree nor disagree	124	17.27%
Disagree	99	13.75%
Strongly disagree	323	44.99%
Not Answered	31	4.32%

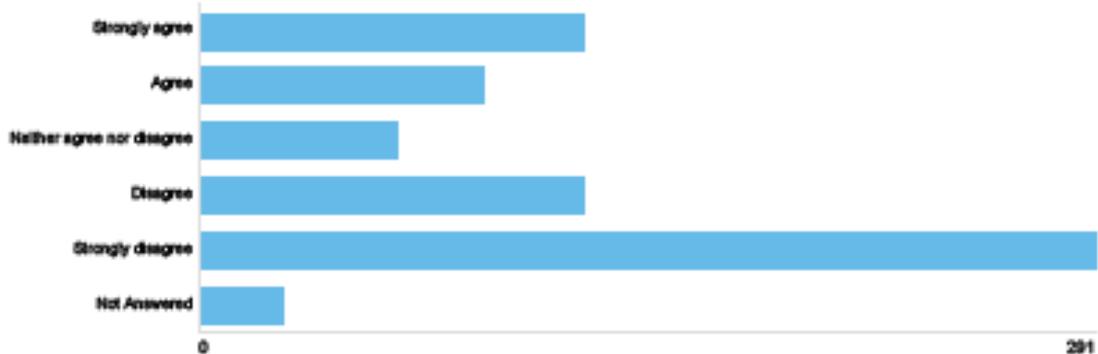
Question 14: Do you agree that older vehicles (5+ yrs) should have to have more than one inspection per year, to allow for an increased frequency of emissions and roadworthiness testing?

more inspections for older - Taxis



Option	Total	Percent
Strongly agree	108	14.76%
Agree	80	11.14%
Neither agree nor disagree	39	5.43%
Disagree	133	18.52%
Strongly disagree	354	49.30%
Not Answered	14	1.95%

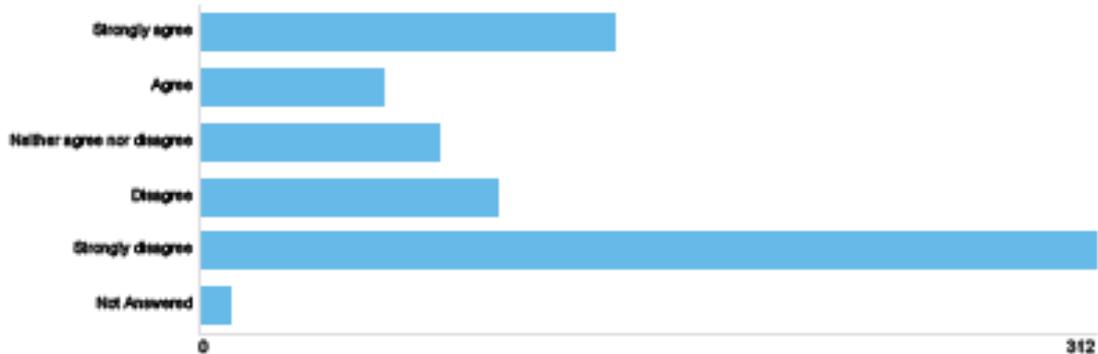
more inspections for older - PHCs



Option	Total	Percent
Strongly agree	125	17.41%
Agree	92	12.81%
Neither agree nor disagree	64	8.91%
Disagree	125	17.41%
Strongly disagree	291	40.53%
Not Answered	27	3.76%

Question 15: Do you agree that diesel engine PHCs should be phased out and no replacement diesel engine PHCs should be allowed?

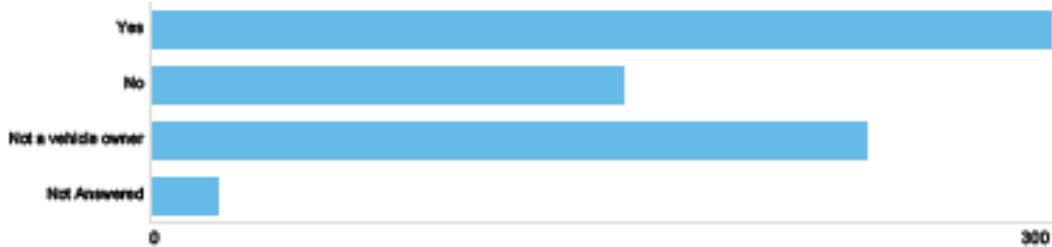
Phase out diesel PHCs



Option	Total	Percent
Strongly agree	144	20.05%
Agree	64	8.91%
Neither agree nor disagree	63	11.56%
Disagree	104	14.48%
Strongly disagree	312	43.45%
Not Answered	11	1.53%

**Question 16: If you are a vehicle owner, would any of the proposed changes to licensing policy require you to replace your vehicle(s)? If you are not a vehicle owner please select 'Not a vehicle owner'.**

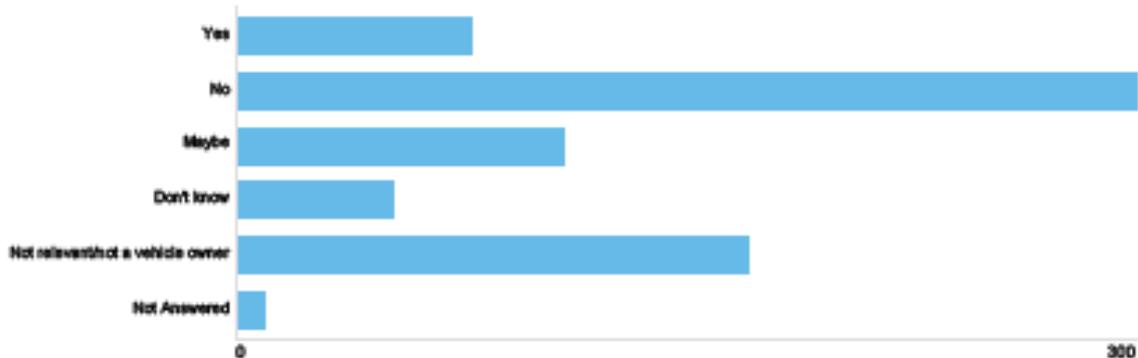
Vehicle update needed?



Option	Total	Percent
Yes	300	41.78%
No	157	21.87%
Not a vehicle owner	239	33.29%
Not Answered	22	3.06%

**Question 17: The cost of buying a new taxi or private hire vehicle is likely to be substantial. If you are a licensed vehicle owner or driver, would you consider renting or hiring a vehicle as an alternative to buying one?**

Hire?



Option	Total	Percent
Yes	78	10.86%
No	300	41.78%
Maybe	109	15.18%
Don't know	52	7.24%
Not relevant/not a vehicle owner	170	23.68%
Not Answered	9	1.25%

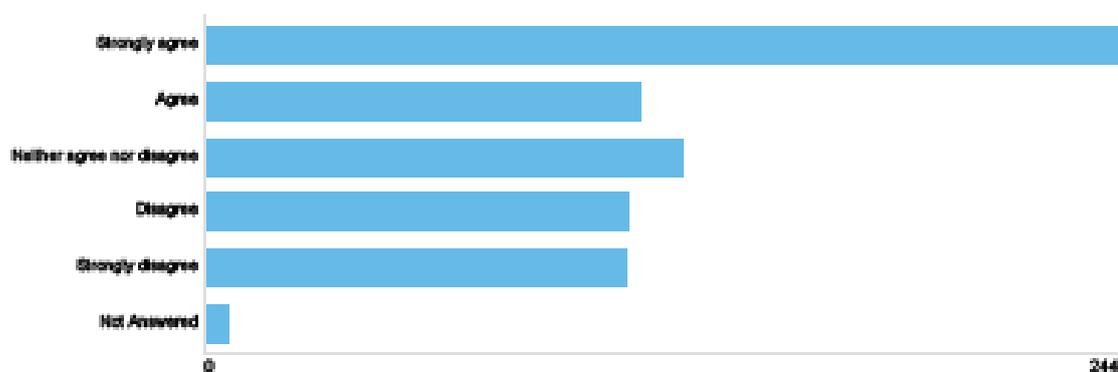
**Question 18: If you answered no to the last question, what was your reason for saying no?**

*why not hire?*

There were 282 responses to this part of the question.

**Question 19: Do you agree that Edinburgh should aim for all of its licensed taxi and private hire vehicles to be zero-emission vehicles by 2030?**

*zero by 2030?*



Option	Total	Percent
Strongly agree	244	33.98%
Agree	118	16.16%
Neither agree nor disagree	127	17.69%
Disagree	113	15.74%
Strongly disagree	112	15.60%
Not Answered	6	0.84%

**Question 20: Is there anything that you think the City of Edinburgh Council or the Scottish Government can do to help vehicle owners to drive cleaner, less polluting vehicles or to reduce levels of air pollution in the city?**

*anything else to help reduce pollution?*

There were 478 responses to this part of the question.

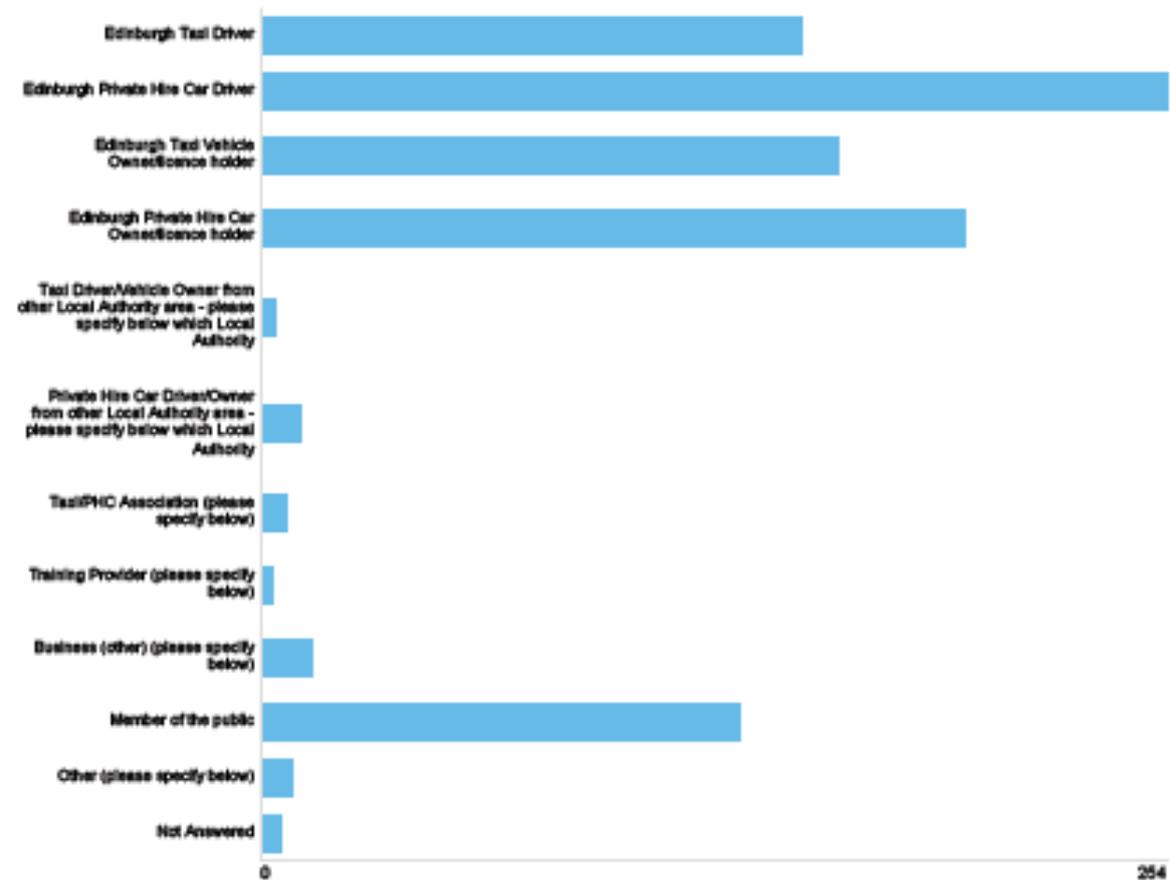
**Question 21: Please use the space below for any additional information, comments or suggestions about the proposed age limitation for licensed taxis and private hire cars that you have not said so far.**

*Additional information, comments or suggestions*

There were 230 responses to this part of the question.

**Question 22: Are you:**

Who are you?



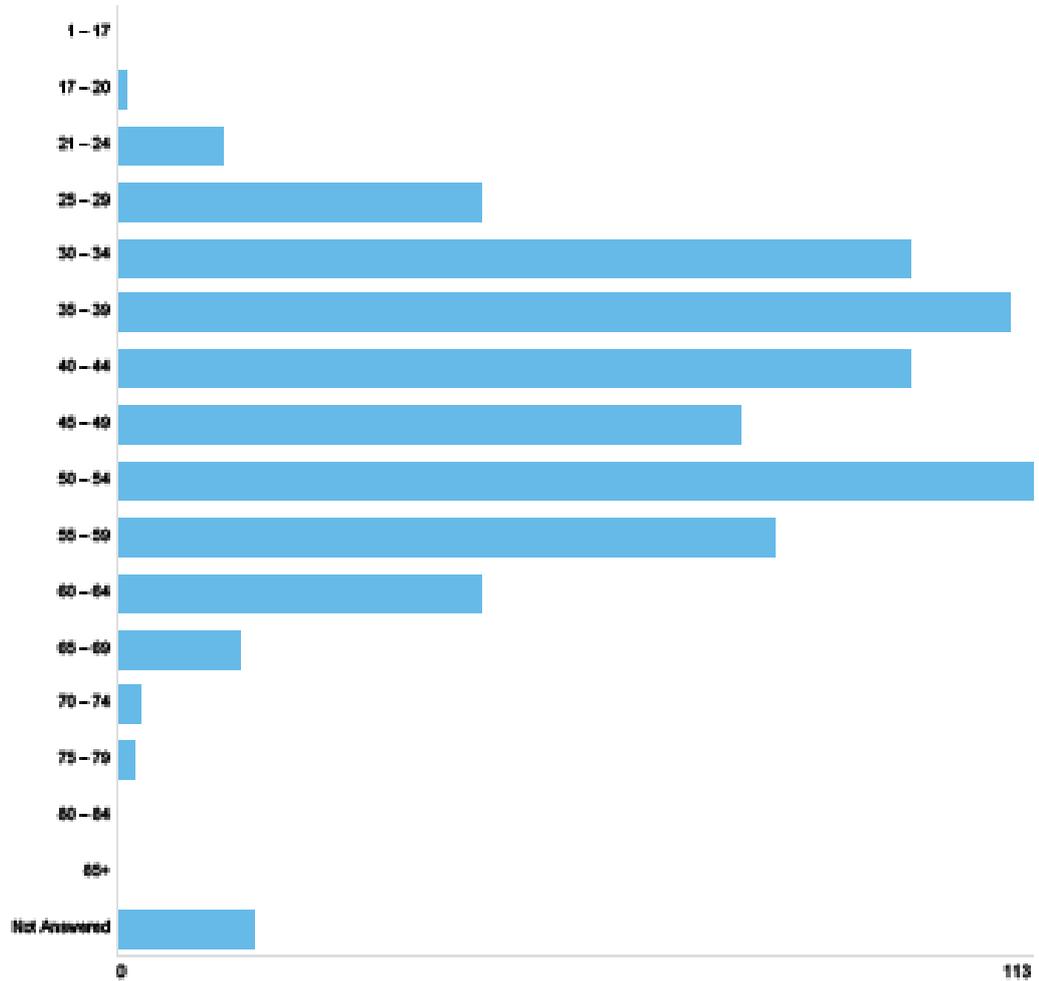
Option	Total	Percent
Edinburgh Taxi Driver	151	21.03%
Edinburgh Private Hire Car Driver	254	35.38%
Edinburgh Taxi Vehicle Ownership holder	162	22.56%
Edinburgh Private Hire Car Ownership holder	197	27.44%
Taxi Driver/Vehicle Owner from other Local Authority area - please specify below which Local Authority	4	0.56%
Private Hire Car Driver/Owner from other Local Authority area - please specify below which Local Authority	11	1.53%
Taxi/PHC Association (please specify below)	7	0.97%
Training Provider (please specify below)	3	0.42%
Business (other) (please specify below)	14	1.95%
Member of the public	134	18.88%
Other (please specify below)	9	1.25%
Not Answered	5	0.70%

**More information about respondent**

There were 52 responses to this part of the question.

Question 23: Which age group applies to you?

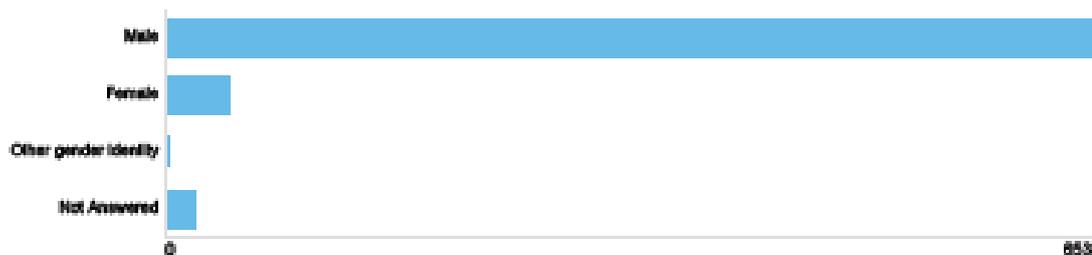
Age bracket



Option	Total	Percent
1 - 17	0	0%
17 - 20	1	0.14%
21 - 24	13	1.81%
25 - 29	45	6.27%
30 - 34	98	13.65%
35 - 39	110	15.32%
40 - 44	98	13.65%
45 - 49	77	10.72%
50 - 54	113	15.74%
55 - 59	61	8.46%
60 - 64	45	6.27%
65 - 69	15	2.09%
70 - 74	3	0.42%
75 - 79	2	0.28%
80 - 84	0	0%
85+	0	0%
Not Answered	17	2.37%

Question 24: What is your gender?

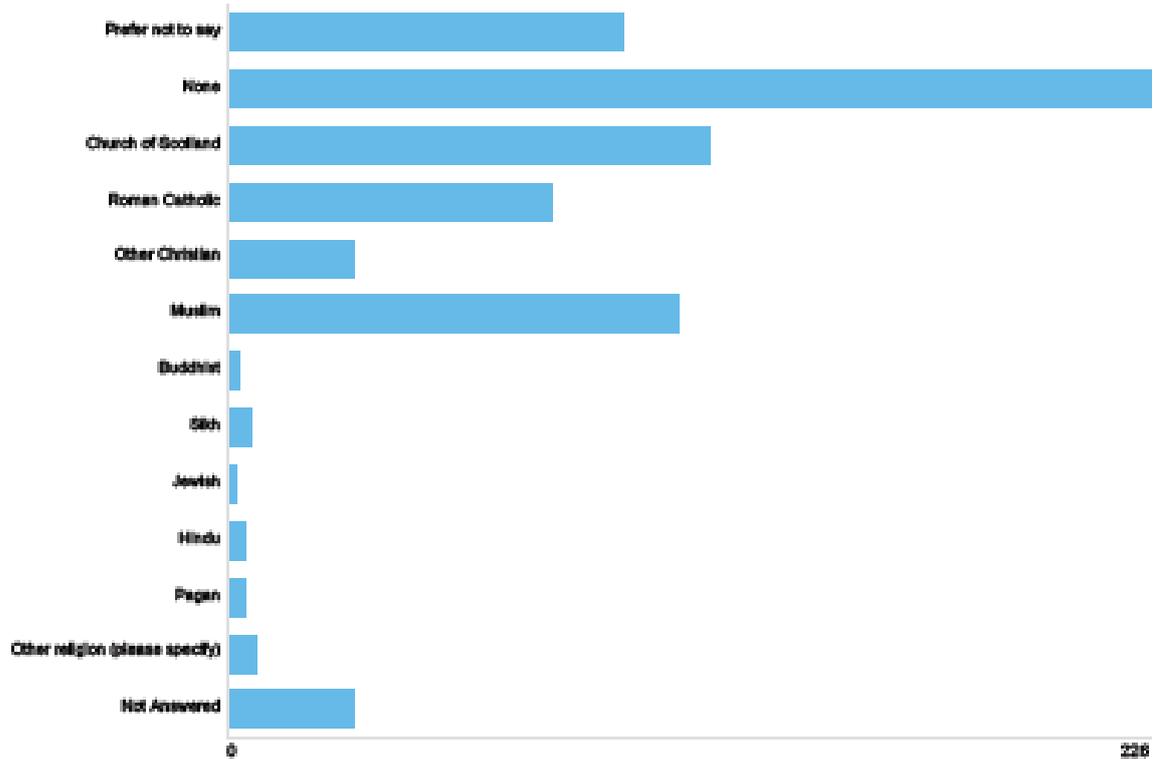
Gender



Option	Total	Percent
Male	663	90.95%
Female	43	5.90%
Other gender identity	2	0.28%
Not Answered	20	2.79%

**Question 25: What religion, religious denomination or body do you belong to?**

**Religion**



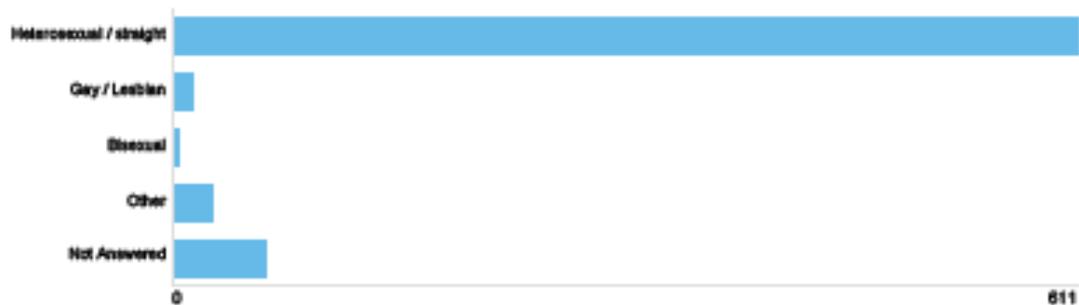
Option	Total	Percent
Prefer not to say	97	13.51%
None	228	31.48%
Church of Scotland	118	16.43%
Roman Catholic	79	11.00%
Other Christian	31	4.32%
Muslim	110	15.32%
Buddhist	3	0.42%
Sikh	6	0.84%
Jewish	2	0.28%
Hindu	4	0.56%
Pagan	4	0.56%
Other religion (please specify)	7	0.97%
Not Answered	31	4.32%

**If you answered 'Other' please specify**

There were 15 responses to this part of the question.

**Question 26: What is your sexual orientation?**

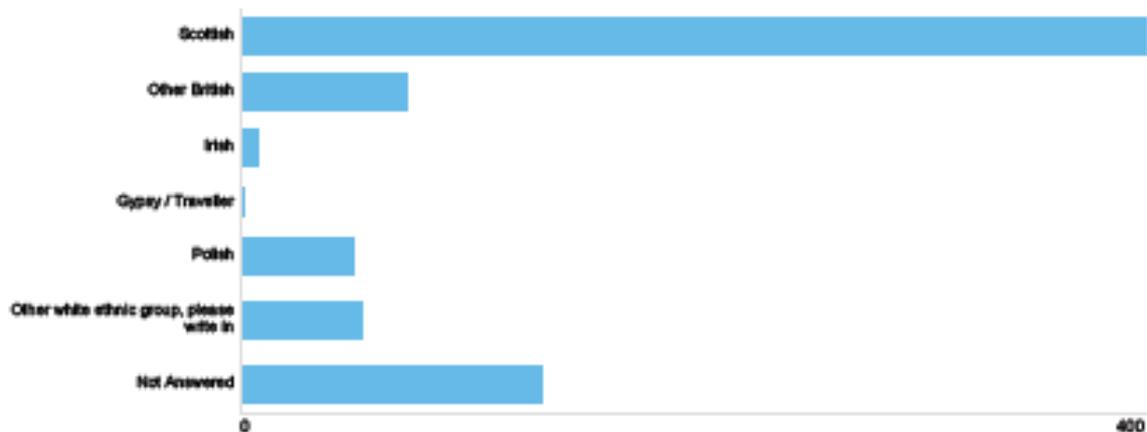
**Sexuality**



Option	Total	Percent
Heterosexual / straight	561	85.10%
Gay / Lesbian	13	1.81%
Bisexual	4	0.56%
Other	27	3.76%
Not Answered	63	8.77%

**Question 27: What is your ethnic group? (Choose ONE section from A to E, then tick ONE box which best describes your ethnic group or background)**

**Ethnicity (A - White)**



Option	Total	Percent
Scottish	224	56.71%
Other British	74	10.31%
Irish	7	0.97%
Gypsy / Traveller	1	0.14%
Polish	50	6.98%
Other white ethnic group, please write in	53	7.50%
Not Answered	133	18.52%

**Other white ethnic group, please write in**

There were 56 responses to this part of the question.

**Ethnicity (Mixed or multiple ethnic group)**



Option	Total	Percent
Any mixed or multiple ethnic groups, please write in	6	1.11%
Not Answered	710	98.89%

**Any mixed or multiple ethnic groups, please write in**

There were 6 responses to this part of the question.

**Ethnicity (Asian, Asian Scottish, Asian British)**



Option	Total	Percent
Pakistani, Pakistani Scottish or Pakistani British	92	12.81%
Indian, Indian Scottish or Indian British	12	1.67%
Bangladeshi, Bangladeshi Scottish or Bangladeshi British	26	3.62%
Chinese, Chinese Scottish or Chinese British	3	0.42%
Other, please write in	3	0.42%
Not Answered	582	81.06%

**Other, please write in**

There were 6 responses to this part of the question.

**Ethnicity (D - African, Caribbean or Black)**



Option	Total	Percent
African, African Scottish or African British	9	1.29%
Caribbean, Caribbean Scottish or Caribbean British	0	0%
Black, Black Scottish or Black British	1	0.14%
Other, please write in	3	0.42%
Not Answered	705	99.15%

**Other, please write in**

There were 3 responses to this part of the question.

**Ethnicity (E - Other)**



Option	Total	Percent
Arab	5	1.11%
Other, please write in	4	0.56%
Not Answered	705	99.33%

**Other, please write in**

There were 8 responses to this part of the question.

**Appendix 4 – Respondent’s Online Comments**

<p><b>Q.20</b></p> <p><b>Q.21</b></p>	<p><b>Is there anything that you think the City of Edinburgh Council or the Scottish Government can do to help vehicle owners to drive cleaner, less polluting vehicles or to reduce levels of air pollution in the city?</b></p> <p><b>Please use the space below for any additional information, comments or suggestions about the proposed age limitation for licensed taxis and private hire cars that you have not said so far.</b></p>
1	Invest in renewable energy. Provide incentives for purchase of 'green' vehicles.
2	Reduce the number of PHC's and limit areas of the city centre to buses, taxis and emergency vehicles only.
3	Cap private hire cars as they are causing more pollution and heavy traffic problems as there are too many on the road also put the price back to what it was for phc plates
4	Keep a test centre and if reported to it ur vehicle must get spot check
5	<p>Taxi/private hire numbers are rising.</p> <p>Vehicle purchase and running costs are rising.</p> <p>Driver earnings are falling due to oversaturation in the private hire sector.</p> <p>Massive Government subsidies will be required to meet any targets imposed, as the cost of new taxis are now approaching the 'unaffordable' level.</p> <p>So much work has been lost to private hire that the taxi trade is now struggling to re-invest in itself as a tragic result.</p>
6	<p>Reducing pollution - the largest single polluter, by the CEC's "Local Transport Strategy", page 24 diagram. Is buses. So stop the queuing of buses to even get to the Bus Stops particularly at Waverley Steps and along Princes Street by having all smart payment preferably by chip enabled contactless bank cards - London's Oyster Card is on the way out. Swipe on entry and exit - maximum fare on next use if not swiped out double beep for concessions to reduce cheating, 2 doors, one in and one out. This reduces dwell time at stops. It also give Lothian Buses data to optimise services and fare structure. I suggest a high fare for 2 stops along Princes Street. Congestion charging, More off street car parking near the city centre, Queen Street Gardens, the Meadows - underground of course. This is done in many continental cities to good effect - eg the central plaza in Maastricht AND then more pedestrianisation and car no go streets. There could be small electric driven buses between these car parks and the shops.</p> <p>Continuous not discontinuous cycle ways</p>
7	Subsidies would be nice but won't happen. There are all ready too many taxis on the road and no one in their right mind is going to invest up to £50000 on a new vehicle if the return isn't there. Not going to happen.

8	Just recently the council have allowed more than 1000 phc on our roads by dropping the price by 60% and they want to put an age limit on taxi/phc maybe they should look at limiting phc at this time and think about what strategies they can put in for electric (tx5) stations around Edinburgh before this consultation goes ahead or set out about electric stations on a draft. I would like to know this personally as im waiting on an electric cab to come out first before I purchase another vehicle (diesel) it would give great in sight and I might have answered this consultation better if I had know about the electric station in advance
9	Before do anything, the taxi proprietors need more money as earnings drop year on in, with ever increasing phc numbers stealing all the work. Cut phc numbers and we automatically end up with a newer fleet of taxis
10	More electrical supercharger fitted around the city and in taxi waiting areas
11	<p>There's a lot of belching diesel vehicles mostly black cabs with circa 600,000 miles on the clock . Most phc cars are fitted with catalytic converters and DPF their emissions are much lower than older taxis .</p> <p>London have adopted a 15 year rule which I think is acceptable for both vehicle types</p> <p>The new tx5 is all electric and will be priced to reflect zero diesel costs this vehicle requires charged sporadically throughout the day if there's a policy in place requiring such vehicles to be mandatory is the council willing to provide electric charge points at taxi ranks to accommodate the 1300+ taxis and 1700+ phc cars ?</p>
12	Re-widen roads which have been narrowed, remove speed humps, regularly check and realign traffic light changes to better manage traffic flow esp junctions where traffic waits too long due to trams approaching i.e. Waverley bridge.
13	Perhaps if the Edinburgh council didn't introduce another 400 PHC plates and pretty much destroy the Edinburgh taxi trade people would of had more money in there pocket and be more open to replacing there vehicles, as it turns out the taxi trade is now ruined with owners and drivers making less money which in turn would make it nearly impossible for people to afford new vehicles
14	Poulton charge to enter city centre
15	Increase in fares to allow owners to finance any vehicle change as was the case when all taxis made wheelchair accessible.

16	<p>Financial incentives tend to be aimed at the owners of very old vehicles. I can see the logic to some extent but it means that owners who keep relatively new vehicles and update them regularly are effectively penalised financially for doing so. Not only is their finance more expensive (people trading in 8 year old vehicles can access 0% finance but people trading in 3 year old vehicles cannot) but CEC charges more to test a new vehicle than an old one.</p> <p>Regulating the number of PHC cars is the best way to assist vehicle owners. With PHC numbers almost doubling in one year, everyone's income has taken a substantial hit and financing new vehicles is becoming out-of-reach financially. As older vehicle become unsaleable, residual values (which have been very poor for some years anyway due to the high mileage we do in Edinburgh) will become zero. This is because other major cities are introducing age and emission restrictions so we soon wont be able to sell our taxis anywhere else when they reach the age limit here. Imagine writing off a £50,000 vehicle over 5 years.</p> <p>If the number of vehicle is maintained at a sensible level, financing newer, low-emission vehicles and writing them off over shorter period becomes more viable. With an infinite number of PHCs and every decreasing incomes available to owners in the trade, there is no prospect of maintaining a fleet of 3-5 year old vehicles. The financial infrastructure of the trade can't sustain that and will reach a point of collapse.</p>
17	<p>You are trying to reduce emissions in the city then why have we almost doubled the amount of PHC in the last year seems to contradict your own policy and still to this day you allow a free for all in PHC vehicles but you can't get a Taxi licence because we have over provision of taxis pretty strange</p>
18	<p>Reduce VAT on new vehicles and provide interest free loans.</p>
19	<p>Financial incentives would encourage owners to buy or lease new vehicles.</p> <p>To reduce congestion and air pollution restricting the number of PHC cars on the road would help as is the situation with black cabs.</p> <p>Also, introducing a basic English language test and a basic knowledge test would help PHC drivers find their way around the city and therefore reduce congestion and pollution.</p>
20	<p>Help with research into development of zero or low emissions vehicles that are capable of doing the job of a taxi.</p> <p>Duel fuel would be best.</p>
21	<p>I think the council should stop the issuing of PHV plates. The additional vehicles on the road are not helping key pollution areas, St Johns road for example. I think the Scottish Government or the Council should supply low emission vehicles for taxi drivers to rent as the cost of running a taxi at the moment is very expensive. I would not even consider the purchase of a new Taxi because the amount of Uber cars the council have put on the road.</p>
22	<p>Offer financial support to transition to new vehicles</p>

23	Reduce the instances of traffic hold ups to keep a flow of vehicles. The air pollution spots are the places where vehicles are forced to stop or move very slowly for periods. Concentrate on the renewal of older buses, which pollute far more than vehicles.
24	Allow older Cabs to be converted to LPG, Birmingham city council has done so successfully.
25	Costs for running a taxi business are increasing and the main costs are charges implemented by the council and their failure to control licensing in a fair and correct manner coupled with traffic measures that induce congestion rather than ease. The entire traffic system in Edinburgh requires to be overhauled with particular attention required to the number of buses within the city centre and the positioning of bus stances which hinder traffic at busiest times.
26	If Edinburgh council stop stopped putting on Phc cars it would mean less cars sitting about in the city centre having to work longer to make a living. Also if drivers were making a decent living then they might be able to buy newer cars that are less polluting their is only so much business in Edinburgh!
27	Cut the costs and start being a bit more honest with the public.
28	The Edinburgh licenced cab trade (Not the PHC) are controlled by the makers of the purpose built London taxi. If the TX4 or the new TX5 vehicle that they produce, comes only in pink, then that is what we have to buy. If it comes with Euro 4 emission, then that is what we have to buy. The cab trade have no say in what the manufacturers do.
29	Yes there are  1, limit the phc to below 1200  2, if the the trade is in good health then so the air
30	You could raise the 20 mph limit that covers a large proportion of the city back to 30mph. Emmieions would be lowered massively from all vehicles.  You could also subsidise the cost of a new vehicle to meet your emmisions targets.
31	Have a good look at the roads in Edinburgh, instead of looking at vehicles on the roads !! Who the hell in this city does the traffic management? ? Cause they ain't got a clue,!! I.E. with more and more cars coming on the roads, we the CEC make the roads smaller,, put in a Tram line that causes more pollution by clogging up the traffic !!  Bring in a traffic committee  2 police officers, Bus and taxi drivers and two environmental people!!! Because the CEC sitting in a office ain't got a clue , try driving around and around our city day by day !!
32	Don't put over 1000 extra private hire/uber cars in the road in the space of 3 years. Obviously going to cause more congestion and pollution.
33	Stop supplying licence s to P H C cars and Taxis over Three years old
34	tax the emitting vehicles

35	<p>Offer discounts for purchase of/replacement to environmentally friendly vehicles.</p> <p>Offer reduced rate discounts for vehicles which already are environmentally friendly.</p>
36	<p>Not target one trade</p> <p>Target all road vehicles</p> <p>Buses trains cars everything is pollution so my question is why are the council or government aiming at a minority rather than the majority</p>
37	<p>remove all contributory factors in road congestion</p> <p>ie trams in city centre regularly stop traffic for longer than necessary.</p> <p>remove widened pavements where there is not the demand.</p>
38	<p>Provide more taxi ranks with more spaces on each rank in the city centre area, especially around the train stations. This would drastically reduce the carbon emitted by taxis circling the streets looking to rank.</p> <p>Electric vehicles may work in some cities where the vehicles only work 12 hours out of 24 and have time to charge however in Edinburgh most taxis work 24/7 and are not in one location long enough to be fully charged for several hours a day.</p> <p>Although Edinburgh's black cab fleet is ageing I still believe it has a bigger environmental impact to scrap older, perfectly safe and functioning vehicles than it is to bring in a whole new fleet of taxis.</p>
39	<p>Put the speed limit back up to 30mph that would reduce emissions (fact).</p> <p>Get more taxi ranks or larger ranks as taxis are driving round the city up and down streets looking for fares as the can't get on ranks to park up. You've only got yourselves to blame.</p> <p>Now that you have put on almost 2000 phc plates they are driving round our wonderful city polluting our streets. It's the councils fault for allowing this to happen you reduced the phc plate price to £500 and every man and there dog has bought one. How can you possibly complain that there is a emission problem in Edinburgh it's self inflicted.</p>
40	<p>Put a emission converter on the exhaust. So that the emissions are harmless.</p>
41	<p>Get the phc cut by 35% .improve ranking space in city less driving about looking for work.</p>
42	<p>Offer the same grants that are given to bus operators.</p> <p>They receive substantial finance help in running their business.</p>

43	<p>Less poluting YES</p> <p>Zero poluting NO</p> <p>A lot of excessive polution is caused by dreadful traffic management experiments drummed up by the Driver Haters.</p> <p>Make traffic flow better, all left turns at lights to be giveways and the unnecessarily long periods for pedestrian crossing shortened to what is nessary for an elderly person to cross not a tortoise.</p> <p>Government could put pressure on manufacturers to develop a range of LOW vehicles and give financial support for disabled access taxi purchase.</p>
44	<p>Subsidies for new vehicles.</p> <p>Encourage Edinburgh airport to allow access to all vehicles so nobody drives back to town empty.</p>
45	<p>Reduce congestion. Make taking a car through the centre of the city less attractive. More park and rides, higher parking fees. Its still cheaper to take a family of 4 into town in the car pay for parking than it is to do the same on a bus.</p>
46	<p>How about looking at the city of Edinburgh hop on hop off buses first</p>
47	<p>1) Offer no interest loans to taxi owners to buy a more efficient taxi.</p> <p>2) cut out road tax for taxi's</p> <p>3) Allow taxi's to use red diesel</p> <p>4) Cheaper diesel at the pump for taxis</p>
48	<p>Yes - remove speed bumps and the hypocritical 20mph speed limit - so as to REDUCE emissions from vehicles, which the cooncil ignorantly insists on despite the evidence to the contrary of the NICE Guidelines.</p> <p>For example, the only reason St. Johns Rd at Corstorphine features on the green lobbyists' list of 'hot spots' is because it is such a congestion bottleneck.</p> <p>And like dog mess, the Scottish weather rapidly resolves the problem by diluting and removing emissions by operation of wind/ rain.</p>
49	<p>Make sure rules are enforced</p>
50	<p>Introduce a Low Emission Zone that applies to all vehicles, including taxi's, PHCs. This is a serious matter and with the volume if taxis in our city centre it is something that needs addresses asap.</p>
51	<p>Provide us with grants or financial subsidies to help us continue operating. The costs of brand new vehicles is now so expensive and the amount of work available is heavily diluted by the amount of phc vehicles on the road that very soon, no taxi operators will be able to justify buying a new vehicle. Over time, the trade will just die off. IT IS THAT BAD OUT THERE NOW BEING AN OPERATOR OF A BLACK TAXI. Many drivers</p>

	and owners are on their knees financially and you want to add further restrictions to trade. What is it that the trade has done to upset the council so much?
52	<p>Lobby central government to promote a vehicle exchange grant to remove diesels from the roads - perhaps requiring a swap to electric or hybrid vehicles.</p> <p>Encourage filling stations to provide charging points for electric vehicles.</p> <p>Encourage housebuilders to include charging points in the spec for new homes.</p>
53	<p>Perhaps the City of Edinburgh Council should have thought more carefully before allowing hundreds of new PHC vehicles onto the streets in the last year and therefore increasing the city's omissions output.</p> <p>One the one hand you are happy to rake in as much licence fees as possible with no regards to the impact on the Black Taxi trade who invest a sustantial amount of money on both the purchase and upkeep of their vehicles, not to mention the time and work involved in actually obtaining their brief so they can do the job properly.</p>
54	Encourage subsidies or corporate/public sponsorship of Zero emission taxis to influence owners behaviours and purchases of said vehicles, perchance on a sliding scale over a number of years between 2018 to 2030 with greater subsidy/sponsorship rates at 2018 to encourage change
55	Cut the costs of renewing a licence at yearly test to the same as what owners in other licencing areas pay. Edinburgh charges are utterly ridiculous.
56	Yes give us a grant to pay for it.
57	Any new licence for taxi or Phc should only be permitted if a brand new vehicle is put on with latest emission limits.
58	<p>Before introducing restrictions there should be an affordable, clean taxi solution on the market. Currently a new taxi is out of reach of most operators at circa £45k for a new vehicle. The electric TX5 is likely to be even more expensive.</p> <p>0% loans might be a help, but some form of subsidy would be preferable.</p> <p>Perhaps the council should approach several taxi manufacturers to bid for exclusive supply to the trade in Edinburgh. In return, the price of the vehicle should be affordable to buy or rent and maintain.</p> <p>There are other methods the council could adopt to reduce air pollution such as congestion charging, making it compulsory for vehicles registered outwith he Edinburgh to use designated park and ride facilities and encourage more frequent use of train, tram and bus.</p>
59	yes abolish the 20mph as i am using more fuel.

60	A financial incentive to change the vehicle may help or an additional tariff to help cover the cost of the new vehicles.
61	There would need to be greater funding to allow the change as vehicle prices are now at their highest ever, over £43k for a new hackney spec vehicle. Also the fact that earnings have dropped make owning an older vehicle an attractive option to some drivers. The mass issuing of PH plates in Edinburgh is having a negative effect on both trades and not allowing changes of vehicles on either side as easy as it used to be.
62	<p>The first thing the Scottish Government must do is stop over-provision of licensed vehicles across Scotland.</p> <p>The cap on private hire numbers available in May is arbitrary and ineffective at local level given the different stances of various neighbouring councils. The Scottish Government should look at population, business and tourism numbers for each local authority and set a cap on private hire vehicles accordingly. Over provision is destroying livelihoods and undermining the ability to provide capital investment in new vehicles.</p> <p>There should also be more rank spaces for hackney vehicles, which improves efficiency by reducing driving miles and so emissions.</p>
63	improve public transport across the city
64	I feel some financial incentive should be given to owners and possibly further training. Education and understanding is key in any area as awareness and knowledge can help greatly.
65	Give grants to cabbies, who need substantial help to buy a new taxi. The current cost of a new taxi is in the extremities of plus £40,000.
66	Laughable , saturated ph market as council desperate for money . What does this extra 1000 motors license money go towards ????? Edinburgh had the highest standard of TAXIS in Britain bar none about 5 years ago , but due to the councils pathetic failure to sort pot hole ridden streets that are akin to a third world country And you expect the motors that are on the rd about 150 hrs a week to be in great condition ,??? Also the whole emissions idea is a bit of a joke when you consider the blanket ban on motors going over 20mph thus everyone driving in lower gear . Also the 1000 extra ph motors on rd driven by clueless clowns who have no idea where they are going means that drivers who have taken out what would be the equivalent of a small mortgage to get a black cab on the rd are now driving about more and more to try and get a fare thus creating more pollution. Why wasn't there a cap on ph numbers the same as black cabs have had for years ? Or were the council coffers running so low ? It's no wonder guys that have owned or driven taxis for years are now leaving the trade in droves as the trade is dying on its feet now but no one will give a monkeys at council hq. To summarise the council make me sick .
67	<p>Stop issuing new PHC licenses. There is no unmet demand, and issuing new licenses only encourages hundreds more vehicles into the city centre.</p> <p>A review of age limits on buses would be more appropriate.</p>
68	Introduce ranks where taxis can sit rather than continue to circulate looking for work ,

69	<p>encourage new vehicle replacements by offering a scrappage scheme and provide a more rewarding environment by reducing the overall size of the PHC with restrictions on the numbers of street taxis to prevent cruising for work and excessive use of taxi ranks.</p> <p>Modern digital communications technology should be a licensing condition to be used in the allocation of work to taxis to eliminate unnecessary vehicle mileages.</p>
70	<p>We have very few charging points in the town. Help to buy/rent electric vehicles. Cap the amount of Phc licences being issued</p>
71	<p>Edinburgh council have recently added over 500 PHC vehicle's thus causing much more congestion added pollution and more competition to make a living, in the future drivers won't be able to afford the new electric cars</p> <p>The council could help by making traffic flow easier by lengthening the time of traffic lights on green a few seconds longer, bringing back more roundabouts at junctions and adjusting the time settings on button pedded pedestrian crossings which change to red instantly, they would be better with a longer delay</p>
72	<p>Offer £5000 grant</p>
73	<p>The council could stop releasing PHC plates as they have not implemented a cap so the numbers continue to grow. If they want to reduce emissions stop putting more vehicles on the road that are going to be mostly in the town centre</p>
74	<p>The council should start by limiting the PHC cars. The ECC talk of wanting a cleaner city but have more than doubled the PHC operating within a year, total hypocrisy. There should be more ranks at Waverly Station so Taxis can actually rank without fear of being moved on. When Taxi's can't rank they have to drive around, thus causing more pollution.</p>
75	<p>- enforcement of engine idling restrictions on taxis waiting in ranks</p>
76	<p>Implement and enforce a 'no idling' policy.</p> <p>Introduce additional electric vehicle charging points.</p> <p>Improve responsiveness of traffic signals to presence of vehicles (i.e. change to green when vehicles stopped at lights)</p>
77	<p>More of the city should be closed to private cars but remain open to cabs and PHV to allow the latter to move quickly and provide an efficient and profitable service, but only if cabs and PHV are low emission and preferably not diesel.</p>
78	<p>Introduce tolls on most major roads plus city perimeters.</p>
79	<p>Introduce congestion charging for licences cabs and taxis</p>
80	<p>Create more onstreet charging facilities, such facilities should have time limits to prevent people using them as all day parking spaces. Make it compulsory for private car parking facilities - such as hotels, shopping centres, retail parks - to have adequate charging facilities too.</p>

81	Yes offer a scrapage scheme that will give grants to taxi owners encouraging them to switch vehicles. For this to work it would have to be a substantial grant equal to the cost of a new vehicle, as most taxi owners could not afford to change vehicle
82	How about not handing out PH licenses to any one who wishes a PH car and cap the number on the road as the licenses are spiralling out of control and constantly rising
83	Subsidise the new vehicles as these are very expensive.
84	Pollution is not only caused by older diesel cars  There are dangerous gases from newer Mercedes taxis also  The council would need to help owners to pay for newer taxis
85	Scrap this stupid 20mph limit. In my opinion, vehicles are not designed to have engines labouring at low speed. This in itself causes more pollution.
86	The City of Edinburgh Council should make active travel far more attractive and safer by investing in quality infrastructure that makes it an easy and natural choice for most journeys.  HGV use in the city should also be reduced and alternatives used for city wide deliveries.
87	promote public transport (subsidising where advantageous); consider traffic bans; encourage cycling and walking.
88	That's a very difficult to answer in only a few words
89	To reduce levels of air pollution in the city - make it harder for people to drive private cars into the city and encourage them to use modes of transport such as walking, bicycles, buses and trams instead.
90	Yes they could make more interest free loans available for people like me who have older vehicles and are being forced to buy something for no other reason than city council vanity
91	Provide a subsidy or grant or interest free loans over the lifespan of the new vehicle. Offer a scrapage scheme. Look at the current suppliers of taxi manufacturers and see if they can provide a vehicle suitable for purpose at a more affordable price.
92	I personally think natural wastage of vehicles is quite adequate considering the level of the cab testing, considering all the traffic on our roads I think we are being picked on as a political scapegoat,also licensed taxis are public transport providing invaluable transportation for disabled and we get no help from government or subsidies,and the trade is nearing breaking point because of lack of work,we are losing customers every day who are now using cheap PHC's

93	<p>As a cab driver for the past 24 years in Edinburgh I can tell you that it is the council that causes the pollution congestion in the city, the council's traffic calming measures is one cause.</p> <p>giving the useless trams the right of way is another congestion problem in the city side streets.</p> <p>widening pavements so buses have to stop on main road for example Ferry Road at Drylaw shops the bus stops are a joke.</p> <p>the list is endless, the council has to look at their own traffic calming &amp; road policy's before picking on the taxi trade.</p> <p>i am willing to come into your office to explain in great detail about council pollution congestion</p>
94	Invest in electric.
95	Put in charging points for electric cars- time and time again this comes up in discussion. "Want to buy one but there's nowhere to charge them!"
96	More infrastructure and tax breaks for electric vehicles
97	Ban single occupancy non-commercial vehicles from city centre during peak hours.
99	<p>Short term:</p> <p>Find a way to encourage uptake of electric cars and prevent people buying diesel cars.</p> <p>Medium term:</p> <p>Strongly encourage cycling and public transport as alternative means of transport. Edinburgh is perfect for this as it is already substantially quicker to travel by bike than car/taxi/bus even over a long journey say from the shore to Colinton. (30 min bike, 40 min drive, 1 hour bus)</p> <p>Long term:</p> <p>publicly owned fleet of electric self driving taxis with a complete ban on all human driven vehicles in the city. Such vehicles could be funded through a new Scottish tax and remove the need for almost all car ownership. This would facilitate the removal of traffic lights and almost all roads could be 20 MPH and one way.</p> <p>This, combined with there no longer needing to be parking available for anyone would lead to a huge reclamation of green space in the city and drastically improve air quality.</p>

100	<p>Licensing standards must mandate the cleanest of vehicles to be used in built up urban areas.</p> <p>In the USA, 'Smog checks' are carried out annually for all vehicles, with real time sampling of tailpipe emissions.</p> <p>Ensuring this is part of the license process (perhaps with 10k miles checks rather than time for heavily used vehicles) will remove cars that are starting to fail and emit disproportionate pollution into our city.</p>
101	Encourage cycling and in the longer term promote self driving car legislation in the city.
102	We need a lot more incentives for EVs, charging pints, parking incentives etc.
103	CEC should resign en-masse and stop being anti car. Abominations of city planning which deliberately bring junctions to a halt with vehicles idling for excessive times purely by the mis-management of the council are unforgivable - South St David Street is an obvious example, where a bus could be sat waiting to turn right on to Princes St, and cannot move for two cycles of the lights because of traffic and the trambomination.
104	Congestion charge which applies to all vehicles. Or an outright ban of non electric cars from a certain central area.
105	Congestion charge and extra tax for high emitters
106	<p>Electric/super low emissions zones/roads within the city</p> <p>Electric only parking areas</p>
107	<p>Increase speed limit to 50mph.</p> <p>Faster cars means less time driving in town.</p> <p>Actual cycle lanes.</p>
108	Combine these initiatives will fuel efficient driving, and make emissions/pollution measures very visible to the general public.
109	<p>Roll back 20mph. This stupidity is increasing carbon vehicle emissions because cars built in UK were not built to be consistently driven at 20mph. There's also the feature of charging stations, and the ability to buy cars in an affordable way for today's youth that don't have savings.</p> <p>The reason savings matter, is whenever you go to buy a car, they usually take a deposit, couple years of monthlies, and a final payment, which is often twice the amount of deposit. None of that money will you see again, and it's not something that people can afford.</p> <p>What needs to happen, is car dealers need to start offering payment plans where you pay deposit, and then only pay monthly installments, and NOT have a final payment. This is especially important on electric and hybrid vehicles.</p>
110	<p>Increase electric car charging infrastructure.</p> <p>Provide free trial electric vehicles for both short and long periods to taxi firms to gain buy-in from drivers.</p>

	Do a deal with Telsa.
111	<p>The Private Car should not be allowed within city limits, with the exception of vehicles needed for medical reasons.</p> <p>Improved public transport links should be introduced to make up the gap in mobility.</p> <p>In the face of the air pollution crisis, public health issues from inactivity and not forgetting climate change, there is a need for bold action.</p>
112	Increase the speed limits during off peak hours.
113	<p>Make all buses ultra low emissions / electric / hydrogen</p> <p>Make active travel the primary mode of transport in the city, and make polluting road users work around that; not the other way round as it currently is.</p> <p>Provide very cheap / free cycle hire</p> <p>Provide additional funding for people to buy electric cars, over and above the government support.</p>
114	<p>Some kind of grant to encourage owners to purchase a new vehicle as costs have exceeded affordable limits for most of us.</p> <p>Unrealistic to expect owners to pay £50,000 for a new Taxi</p>
115	Make the LRT bus fleet all electric. It is viable but you won't do it because of the fantastic fuel subsidies
116	Gradually phase out all internal combustion engine vehicles over a couple of decades, (at least in city centres) to electric vehicles.
117	Scrappage scheme
118	<p>Put a Cap on the number of PHC.</p> <p>800+ new licences going on in the last year is only adding to any pollution issues.</p> <p>Also are council vehicles and buses etc going to have the same restrictions/limits put on them?</p>
119	Restrict PHC numbers and have exam for PHC or it's a race to the bottom
120	Reduce reliability on cars and diesel vehicles by improving walking, cycling and public transport connectivity. Make it socially unacceptable for cars to be used for short journeys and make it difficult for people to use the car in the city. Remove parking and give street spaces back to people. Provide tax breaks for the purchase of electric bikes.

	Electric vehicles will help with air pollution but will do little to improve congestion, improve the street environment or encourage people to be more physically active.
121	<p>Immediate cessation of PHC licenses. Over 800 extra vehicles on the road just adds to congestion and pollution.</p> <p>A new purpose built ZERO EMISSION London Taxi Will be launched in January 2018 with a price tag of £50,000.</p> <p>Great idea but with so much extra competition from PHC sector how does one pay for such a vehicle?</p> <p>Unfortunately there is not enough choice of vehicle available to the Taxi Trade unlike PHC.</p> <p>In an ever- decreasing market, hell bent on a race to the bottom, I think the Council will have to abandon the requirement for purpose- built Taxis and let the Trade enter the Electric saloon car market if Council or the Scottish Government want less polluting Taxis.</p>
122	As stated there must be an investigation into the types of vehicles than can be used as Taxis. Currently only two vehicles can be bought at a cost of £44 and £45k and the differential in costs compared with a PHC is too great. The current Taxi Test is not allowing sufficient new drivers to come into the Trade and perhaps the greatest anomaly is the PHC have no test at all!! It is therefore not surprising to take both these factors into account and realise there must be change and this must be made soon.
123	Allow the end of life of all vehicles (including buses, coaches, trucks, vans, private cars and motor cycles) to naturally reduce the age of vehicles on the road.
124	Loans interest free over 10 year periods to make it affordable .
125	When there is need to reduce emissions, Edinburgh city council has no limits on PHC licences, they have now increased to around 1800 that completely contradicts there position, they have had no surveys th see if there is a need. Some of the proposals put forward would make it very difficult to operate a hackney taxi due to the financial cost and the uneven playing field created by issuing so many PhD licences
126	Is it only taxis the council is picking on? As they are a very small percentage of The vehicles in Edinburgh.
127	<p>To help drivers: grants/subsidies to assist drivers that choose to replace their cars with the most environmentally friendly alternatives</p> <p>To help reduce air pollution: low emission zones</p>
128	Cost is a main factor so subsidies of some kind.Also traffic light management to avoid ticking over particularly at junctions involving trams could be better. Also management of cab numbers because if you can't make a living you can't pay for the latest vehicles.

129	<p>I strongly disagree with this proposal of singling out taxi/phc vehicles. We are all part of the problem so proposal should include</p> <p>Buses,lorries,classic cars,motorbikes,</p>
130	<p>For electric vehicles, ensure more charging points provided in eg supermarket car parks. For non-electric vehicles, lift the 20mph limit as most engines are inefficient at low speeds.</p> <p>Subsidise replacement of the bus fleet to allow Lothian Busses to accelerate their move to hybrid vehicles.</p>
131	Build Rapid Charging and Induction Charging infrastructure.
132	<p>Let private hire vehicles into the green ways</p> <p>Provide grants or interest free loans for drivers purchasing electric cars , Euro 6 emission vehicles .</p>
133	If PHCs were allowed in the bus lanes they would move more quickly at peak times, thus reducing air pollution
134	<p>Let private hire vehicles onto GreenWays as passengers feel cheated they are being left in traffic and Taxis are being able to use the GreenWays.</p> <p>Provide grants or interest free loans for drivers purchasing electric cars, Euro 6 emissions vehicles. I would certainly consider an electric car for my PH driving.</p> <p>Driving in low gears because of the 20mph is perhaps another cause of higher emissions, thus needs to be looked at.</p> <p>Perhaps a 30mph should be allowed after a certain time.</p>
135	Reduce regulation and cost. Allow for normal insurance costs like other countries but stipulate the vehicle must be electric. Allow electric only PHCS and taxis in the bus lanes. Have orange flashing junctions at night to reduce needless braking and acceleration. Install roundabouts instead of traffic lights at minor junctions.
136	<ul style="list-style-type: none"> <li>- Subsidising for the desired vehicles to be bought;</li> <li>- more free charging points.</li> </ul>
137	I would like Edinburgh Council to consider allowing PHC's to use the Greenways as equal to Taxis, as PHC's have more vehicles on the road than Taxis and carry more passengers. PHC passengers all complain to drivers on why they are not using greenways during peak times and costing them more using longer routes. Also the enforcement of 20mph zones around Edinburgh does not help the environment. I believe that Edinburgh Council must look at the 20mph zone again before implementing the next phase next year.
138	LIMIT New PHC licences for a start
139	some sort or subsidised help if buying electric car etc as at the moment they are very expensive and they don't have very large ranges.

	Incentivise zero emissions vehicles. Priority licencing process, (next day), lower/zero licencing fee for zero emissions?
140	Reduce licensing costs to compensate
141	Allowing Private hires to use the greenways would cut down air pollution.
142	Phase out diesels
143	Allow PHC access to green ways as not fair for customers. We are bigger than black taxis and carry more passengers than them. Customers complain that it cost them extra to use private hire as we can't use green ways and can't turn right at certain junctions! Also by excluding us from green ways then we are adding more emissions by not taking the most economical route! Also 20mph limit is silly and adding more emissions. Maybe keep it 20mph during the day and evening say 7pm-7am make it 30mph.
144	Let private hire into green ways  Provide grants for drivers or interest free loans for electric cars.
145	Increase grants and incentives for cleaner vehicles.
146	Let private hire taxis use greenway lanes. Give interest free loans and grants for electric cars
147	Allow PHC's to use the bus lanes to keeping PHC traffic to keep moving and therefore reduce inefficient diesels ticking over in slow traffic causing excessive pollution.  There is significantly increase of pollution as the PHC number of vehicles grows.  I may purchase an EV if incentives are available. These could be: grants, interest free loans and some kind of guarantee of work being available due to the vehicle specification, i.e. 100% EV not hybrid.  Edinburgh might be able to fund grants by charging customers a small fee which could give them carbon credits to make them feel good? Anything is possible with the apps now used by Taxi and PHC companies. Must be loads of ideas out there!
148	Provide interest free loans to buy zero emissions vehicles .
149	Access to green/bus lanes for phcs would have a huge beneficial impact on air pollution levels in the worst areas of the city... the reason being that it would allow traffic to move much more freely in the very busy parts of the city. .... in exactly the same way the Bkacj Taxis do.  More electric charging points for evs would encourage more drivers to change.
150	Allowing PHC onto greenways will certainly reduce emissions not only from those PHCs going along the greenway, as they're not stationary, but it will also reduce an overall congestion in the city (by taking these cars out of traffic queues).  Electric cars are really expensive, often way over the budget of the driver. Grants or interest free loans would certainly encourage more people to go electric.

151	<p>Let private hire vehicles in to the green way.</p> <p>Provide Interest free loans for buying electric cars.</p>
152	<p>I think bigger problem is with Black Cabs then with Private Hire. There is a lot very old Black Cabs or there is 4 drivers on one Black Cab. It cause problems with them. I can see lots of them with black cloud behind. They are in fatal condition. I have no idea how they can pass Cab Test.</p>
153	<p>Emissions can be partly reduced through better driving; accelerate gently; brake gently; anticipate the need to brake; keep within the speed limits. Taxis should be fitted with GPS and 'black boxes' to record and monitor driver behaviour in relation to location.</p> <p>Vehicle emissions should be monitored on the basis of performance 'on the road', which is often widely different from performance as claimed by manufacturers.</p>
154	<p>Design transport with active travel as the priority and as it the most inefficient, cars last.</p> <p>Make cycling safe. It has zero emissions and unlike electric vehicles, does not contribute to congestion.</p> <p>Make it more convenient to walk and use public transport. More space given for pedestrians.</p> <p>Make it illegal for any vehicle to have its engine on when stationary.</p> <p>Make 20mph default urban speed limit.</p> <p>Ban HGV's during rush hour periods.</p> <p>Enforce parking restrictions.</p> <p>Enforce speeding, mobile use and other dangerous driving offences</p>
155	<p>Phasing out diesel vehicles must be a priority. I do think hybrid petrol-electric and LPG options should be made available to taxi operators as electric may not have sufficient range for a day's use on a single charge.</p> <p>Euro 6 diesel is a bit of a white elephant as research shows the majority of compliant vehicles can't meet the required standard in real-world tests. Any scrappage discount funded by the SG should only be available against a new electric, hybrid or LPG vehicle and not a new diesel.</p> <p>My final point is that a diesel vehicle will be on the road for 10 to 15 years before it is scrapped. Emissions from these vehicles will increase with wear and tear. I would like to see a city-wide ban on older diesel vehicles and a parking charge regime based on real-world pollution, size and weight for newer vehicles.</p>

156	<p>Council could encourage and promote zero emission vehicles, for example by highlighting and encouraging people to prefer to book zero emission taxis.</p> <p>There should be greater enforcement of policies / legislation relating to air pollution, including prosecutions - as such air pollution is killing more people in the city than most other external factors combined.</p>
157	<p>At this stage, clean EV technology is NOT available or far too expensive but the City of Edinburgh Council might consider giving grants for the right vehicles.</p> <p>Also, proving free and plentiful charging stands will always help more EV/PHEV vehicles to be adopted.</p>
158	Let's look at a congestion charge for vehicles again
159	Get rid of 20mph zones and traffic will flow better.
160	more than 10 year olds car can remove from steer
161	<p>Checkk black xabs which are 30years old and emit black smokes all time</p> <p>But police and xouncil dont do anything against them .....why ??? You are after poor people and black cabs xan do what they want ....wonderful no?</p> <p>Sorry but by this action council will increase more job seekers...</p> <p>Moreover control phc vehicle and driver license as thousands of people are coming to edinburgh from bradford brimingham and londn to.drive here and there family back home cliaming benefits too.....</p>
162	<p>30.....10 miles per h les emission</p> <p>I don't think so</p> <p>Or LPG no diesel car but lpg</p>
163	Get rid of all the problems with the roads traffic jams road works etc
164	<p>Let private hire vehicles into the green ways.Provide grants or interest free loans for drivers purchasing electric cars , Euro 6 emission vehicles.</p> <p>Thanks</p>
165	Treat all taxi the same
166	<p>Leave the EU nonsense alone .</p> <p>Sack the council.</p> <p>Vote out the SNP</p> <p>Stop handing out phc badges and plates to every Mohammed, singh and jankovitch</p>
167	Allowing PHC cars on green lanes.

168	<p>Allow phc vehicles to use greenways to help reduce emissions as a matter of urgency.</p> <p>There are far too many sets of traffic lights within yards of each other that don't seem to work to keep traffic flowing. You get a green light at one and next set 50 yards away change to red straight away. We need to look to keep traffic flowing wherever it is possible.</p>
169	<p>We should all work to reduce emissions but at the same time car owners should be given enough time to replace old vehicles.</p>
170	<p>Allow Private Hire vehicles to use Green Ways to reduce emissions and speed up the transportation of citizens and visitors throughout the City.</p>
171	<p>PHC should use green ways.</p>
172	<p>Allow Private Hire Vehicles into the green ways.</p> <p>Provide grants/interest free loans to allow drivers to purchase electric cars and cars that met Euro 6 emission standards.</p>
173	<p>PHC should have access to green lanes.</p> <p>Many PHC are 8 seaters and can work out cheaper than a bus journey so should be encouraged.</p> <p>All PHC are regularly serviced and maintained if they pass an CAB test then they are fit for use. Phasing out diesel cars is a priority but the livelihood of PHC drivers and owners need to be taken into consideration. Edinburgh could not afford a collapse in numbers of PHC vehicles on the road.</p> <p>Grants for electric cars should be available , but only the Tesla does enough miles between charges and current models are over £60,000. A smaller cheaper Tesla will be on the market in 2018 at a cost of nearer £40,000 which would carry 4 passengers plus luggage with a range of at least 200 miles per charge.</p>
174	<p>Let private hire vehicles into the greenways. Provide grants or interest free loans for drivers purchasing electric cars (euro 6 emission vehicles)</p>
175	<p>Allow phc to use green ways</p>
176	<p>Let private hire vehicles drive in green ways</p> <p>Provide grants or interest free loans for drivers purchasing electric cars , Euro 6 emission vehicles .</p>
177	<p>PHC DRIVERS SHOULD BE ALLOWED TO USE BUS LANES AND GREEN WAYS</p>
178	<p>You did 20mph in town and know you worry about pollution sometimes I think that people working in council are on drugs or just no brainers. What about police cars ? Would they still be disels ?</p> <p>What about the buses that making much more pollution?</p>

179	Yes as we provide a public service council and government should let private hire vehicles in to greenways. Provide grants for changing vehicle or an interest free loan for drivers purchasing electric cars euro 6
180	Let private hire vehicles into greenways , provide grants or interest free loans for drivers purchasing electric cars ,Euro 6 emission vehicles .
181	I feel allowing private hire to use same routes as 'black' cabs,such as greenways.(i have driven them for 15years),would reduce congestion.and therefor,reducing pollution levels!
182	Let private hire vehicles into the green ways.  Provide grands or interest free loans for drivers purchasing electric cars, Euro 6 Emission vehicles.  Stop spreading 20 MPH zones, it makes more traffics and more consumption and also higher pollution.
183	PHC SHOULD BE ALLOWED TO USE BUS LANES AND GREEN WAYS
184	let phc into green ways ,euro 6 emission
185	Allow PHC cars to use Greenways. Ban all diesel vehicles excluding PHC and Licenced Taxis from city centre, this includes buses and delivery vehicles.
186	0 emissions is not possible for any type o vehicle. To produce electricity you still need to burn fuel so you must produce c02 so make no sense 0 emissions vehicle. Nasty diesel emissions with nox get out of city. Only petrol and petrol hybrid cars are good. Electric cars make no sense for next 30 years same as tram in Edinburgh. Waste of money. Also safety futures of modern vehicles our must. Hope I help
187	that phc's be allowed to use greenways we are doing the same job as taxis why should put customers suffer
188	Let Private hire vehicles use green ways / bus lanes . The Scottish government to assist with interest free loans for drivers to purchase electric Vehicles/Euro 6 emissions vehicles.
189	let private hire vehicles into the green ways provide grants or interest free loans for drivers purchasing elecric cars , euro 6 emission vehicles
190	Edinburgh council should allow phc on the bus lines that reduce traffic and co2 emission.
191	How about looking at the 20mph speed limit Vechicles traveling at this pace spews out pollution
192	Taxi's and PH vehicles make a contribution to the transport infrastructure the world over, maybe looking at best practice from elsewhere would be a starting point rather than introducing a penalty to owners who bought cars that were low polluting according to government policies at the time.
193	Allow private hire and taxi in bus lanes only the ones with Zero emmitions
194	Let PHV use bus lanes so we can reduce congestion and pollution in Edinburgh.

195	government incentives to buy electric vehicles, use of the greenways to reduces congestions and pollution, compulsory driver training, Basic Edinburgh knowledge a must, More electric charging stations
196	Let's do some deal with Tesla Cars to buy one cheaper or reduce cab test fee to £50 187
197	There should b no different rules for taxis and phc they should b the same rules
198	Maybe we should let private hire vehicles to drive on bus lines?
199	Allow private hire vehicles into the green ways.  Provide grants or interest free loans for drivers purchasing electric cars or Euro 6 emission vehicles.
200	N/A
201	Reduce the amount of buses that currently use streets at same time ie princess street. Spread the routes through other streets. Ie queen st or George st
202	Allow private hire vehicles to access the green ways.  Make grants or interest free loans available to drivers who are required to buy electric cars, euro 6 emission vehicles.
203	Help drivers to buy electric cars as giving them intrest free easy loans.
204	Please let PHC into greenway & taxi & bus only ways provide grants & intrest free loans for buying new low emission car & electric cars etc
205	Make funds available for people to loan for the purchase of new vehicles.
206	Give grants to buy new taxi or ph
207	let private hire into the greeways supply grants or intrest free loans for driver purchasing electric cars or euro 6 emissons
208	Allow all taxis and private hire vehicles access to the greenways. The longer a vehicle is idling in traffic the more pollution will be caused. If you are serious about cutting down pollution in the city then you would do it without hesitation.
209	A reasonable cap on vehicles of an older age (10+ years)
210	They should stop all vehicles from running and make town for just cyclist.
211	Give us grants to get electric cars
212	You can either limit the number of liscence
213	Reduce alll licence fees.
214	I think that PHCs should be allowed to use the greenways along with taxis & buses. This would help towards reducing the emissions
215	Yeah get rid of 10 plus years old black cabs.you driving behind it and you think you in the smoke room.

216	<p>The City of Edinburgh Council should make operating a new vehicle more affordable. Before the Licensing Fees restructure, Taxi and PHC operators would only pay the 'Annual License Fee' if they decided to do a 'Change of Vehicle' at the vehicles 'Annual Test Date'. This saved both C.E.C Administration time and expense and the Cab Office vehicle testing man hours and therefore money. This was changed and the incentive to change your vehicle for new at test time was removed.</p> <p>As a first step the C.E.C should remove the 'Annual' and 'Change of Vehicle' license cost when an operator decides to replace a vehicle for a new one at 'Annual Test Date', as an incentive to replace an older car for new and help save the operator money at a costly time. The Scottish Government should subsidise this cost to meet their Green Targets.</p> <p>In conjunction with this, and in answer to question 14, vehicles that exceed 15 years of age or Euro 4, could be tested twice a year to make sure they comply with emission tests and road worthiness. Thus ensuring only the best older vehicles are licenced and the cost of two tests could sway these operators to replace older vehicles with new ones.</p> <p>Only zero emission capable vehicles should be approved for use in any NEW [not existing] Taxi and PHC Licence applications that EXCEED the current vehicle licence numbers. This would address the emissions issues at source and would hopefully reduce the amount of applications for New PHC and Taxi licences. A slow down of new licences will help ease the rising congestion and pollution in the city and make sure that New Licenced vehicles are not adding to pollution.</p> <p>A cap on PHC licences should be introduced, for two reasons. Firstly Increased numbers of licenced PH vehicles is adding considerably to congestion and therefore pollution in the city. Secondly increased vehicle licences is diluting the amount of work per vehicle which reduces operators income, as income drops, new, less polluting vehicles become even less affordable.</p> <p>Edinburgh Taxi Tariff is currently down in 178th place in the UK although Edinburgh has the UK's 9th most expensive cost of living . The Tariff needs to be greatly increased to help with the ever increasing costs felt by taxi and PHC operators and the rising purchase prices for purpose built Licenced Taxis.</p> <p>If Edinburgh Council aim to have a fully carbon neutral Taxi and PHC fleet by 2030, the Taxi trade must be supported both financially and with the required charging infrastructure needed to comply with new legislation. The C.E.C can't blindly change legislation and put the full onus on Taxi and PHC operators to comply without assistance.</p>
217	Plz repair the hols and bumps on the road to save our cars suspenstion we r paing to much road tax and roads r verry bad thanks
218	Allow PHC drivers to use greenways.
219	Put a cap or limitation on private plates and licenses as there are too many private hired on road now instead of earning more n more money think for existing people please

220	I think you should think of all vehicles not just taxis or PHCs
221	Ali
223	By introducing 0 percent Apr on easy and affordable scheme for owners.
224	Interest free cars or help of buying
225	introducing the new 20 mph in the city is increasing pollution levels as everyone is having to drive in 2/3 gear hence increasing levels, are the council aware of this so setting about the taxi trade to try and help the situation of which you are creating by introducing the 20mph
226	Yes by allowing the phc drivers to enjoy the same privileges as the hackney fleet i.e green ways.
227	Ph vehicles to be allowed to use bus lanes as taxis as we do the same job. Get car manufacture's to make electric cars go longer distance and have more charge points
228	Get the roads sorted out as there is congestion in Edinburgh all the time which doesn't help pollution in Edinburgh.
229	Let private hire vehicles into the green ways , provide grants or interest free loans for drivers purchasing electric cars and euro 6 emission vehicles.
230	It is all down to the upkeep of your vehicle if you're car is service and clean as they should be the car will run cleaner.
231	Increased public electric charge points. However driving range for entry electric vehicles is limited to 100 miles per charge approximately. This would limit taxi drivers ability to earn money and reduce long fare journeys. Hybrid cars may be a better solution.
232	The council need to accept that the biggest polluters on the roads are buses and trucks by far. The 4000 taxis and PHC are well maintained and serviced . Buses and trucks are a lot noisier than taxis and PHC
233	Let private hire vehicles into green ways.
234	I would suggest that phc and black cabs have regular services and be able to show proof of this
235	The government can increase grants to purchase electric vehicles as at the moment they are too expensive and don't make financial sense to have as PHC.
236	Let PH vehicles use greenlanes
237	Let private hire vehicles into the green ways Provide grants or interest free loans for drivers purchasing electric cars , Euro 6 emission vehicles .
238	Stop issuing more phc plates
239	Let private hire vehicles into the green ways Provide grants or interest free loans for drivers purchasing electric cars , Euro 6 emission vehicles .
240	Limit the amount of vehicles in the worst polluted places to certain times of the day. I/e st johns rd. Limit cars and lorries along that stretch by using times they can use it. Similar to bus lanes

241	we need to be realistic to circumstances surrounding by the taxi driver along with environmental factor. agreed to age limit but in middle of 7-10 years. not too harsh
242	Treat phc and black taxi the same.
243	Electric cars.
244	Private hire vehicles should be allowed to use green ways .... Provide interest free loans for purchasing Euro 6 emissions vehicles and hybrid cars.
245	I thinks they should start limiting the number of private vehicles in the city centre during the day as they cause too much conjection . Only allowed after 6pm
246	Allow phc to use bus lanes to help congestion
247	Work with car dealerships to help to reduce price of new cars for taxi/phc owner drivers.
248	If you are going to put age limits on taxi/phcs it has to be the same limits for both. there would have to be some kind of scrapege payment sceme to help drivers affected by age limits.
249	Scrap the 20 mph limit so you dont drive in a lower gear higher revs putting out more polution
250	Let private hire vehicles into greenways. Provide grants or interest free loans for drivers purchasing electric cars.euro 6 emission cars.
251	Stand at the roadside and you will see the smelly exhausts of old taxis and other vehicles. And sort them first.
252	Let private hire vehicles into the green ways Provide grants or interest free loans for drivers purchasing electric cars , Euro 6 emission vehicles
253	Let private hire and black cabs use green lanes on the same rules
254	Remove B taxis cars off the road that are old then 5 years , servicing history for exciting taxis should be presented at the cab office inspection to make sure cars have been services on time to minimise emission that caused by non looked after engines.
256	Yes I strongly feel that older taxis and cars should be tested more often Private hire cars should have access to bus lanes as they are currently sitting in long lines of traffic emitting diesel fumes and creating more pollution Customers in phc cars are also being disadvantaged as journeys take longer I believe that in Glasgow phc cars are allowed to use the bus lanes Access to princes street would also be welcomed by customers and drivers alike Customers are having to be dropped in side streets and then carry cases to hotel receptions In many cases this is a visitors first impression of our city and I am sure that you wil agree that this is not ideal particularly if the visitor is elderly or indeed had a disability

257	Cap private hire plates
258	<p>1. Give priority status to applications for EVs.</p> <p>2. Give PHC full access to bus gates and greenways; the cost of EVs represent a significant investment which can be incentivised by the increased earning opportunity that access will bring.</p> <p>3. Establish congestion zone in the City, impose a small charge for PHC &amp; Taxis, but give free access to EVs.</p> <p>4. Quickly improve Rapid Charging points infrastructure around City centre.</p> <p>Impose parking fines or removal of vehicles parked in EV recharging bays (not recharging).</p> <p>5. Provide financial support towards purchasing EVs and Euro 6 emission vehicles.</p>
259	get rid of the 20mph zones and allow private hire cars to use greenways
260	Encourage cycling and invest in more cyclist infrastructure.
261	Use greeways
262	<p>Let the phc drivers use green ways, bus lanes 24 hours.</p> <p>And give interest free loans or grants on purchasing electric vehicles.</p>
263	<p>I think there are many private hire vehicles and taxis that are really bad at polluting our city. I think many are good, but some are terrible. Hard to answer these questions since I am in the industry</p> <p>This vehicle, a van registration [REDACTED] I saw spewing out thick smoke from beneath it. The owner was not happy when I made him aware of it. Plus telling me basically to go back where I came from.</p> <p>I think it's an issue I see on vans, buses and even personal cars. We can't just target the taxi business alone.</p>
264	<p>The number of PHC's on the streets of Edinburgh has doubled in the last 2 years increasing the levels of air pollution. The reduction to 20mph has also had a negative effect on air pollution as have all the other road narrowing and bus stops extending into the road schemes the council have implemented in the last few years.</p> <p>Traffic flow within the city desperately need to be addressed. Lessons can be learned from many cities across Europe.</p>
265	Build few underpass and flyover to ease the conjunctions during peak time. Due to bus lane there is always traffic jam. This is what cause the pollution more.... and stop digging up all the Edinburgh if it necessary then builder must be working day Time and night time to finish as quick as they can.
266	Get rid of 20m zone as causes more pollution.

267	<p>City of Edinburgh - stop persecuting car ownership, remove speed bumps and stop the 20MPH limit, all of which increase pollution.</p> <p>Scottish Government to apply European/UK/Gobal Standards</p>
268	Let private hire vehicles into the greenways. Provide grants or interest free loans for drivers purchasing electric cars, Euro 6 emission vehicles
269	Make same rules for black cabs and private hire about using bus lanes to lover emissions in Edinburgh
270	provide finance to help us change vehicles
271	You already do an emissions test
272	Allow PHC,s to use bus lanes which will cut down on journey times, therefor less emissions per journey. Provide incentives for drivers buying electric vehicles.
273	Let private hire vehicles into the green ways. Provide grants or interest free loans for drivers purchasing electric cars , Euro 6 emission vehicles .
274	Stop increasing vehicles on road that should stop pollution.. 2 many car available at moment... Stop others operators getting operators licencing
275	I think targeting the age of a vehicle is pointless.. they all have to pass emission tests as part of there MOT.. regardless of age.. I think we should go with the Euro emissions option .. all vehicles are progressing towards hybrids and fully electric cars in the next few years anyway... the new tx5 taxi out next year is a hybrid.. and so I believe targeting the age of vehicles.. either taxi or private hire is just going to cause mass agrivation to many hard working drivers and owners... I think there will be an introduction of a congestion charge in Edinburgh soon anyway.. so I would urge you to please not target the age of vehicles. Thanks sy
276	Allowing PHC in greenway zones the same rule as hackney many have the same view regardless what's driven, will cut down emissions and also help congestion which in itself creates more emissions when greenways are empty. Provide grants or loan opportunities for drivers purchasing low or zero emission vehicles
277	Alow ph to use green way
278	The problem of air pollutants are: old buses and old trucks, old vans.
279	Let private hires vehicles use green ways
280	Let privet hire vehicles into green ways provide grants or interest free loans for drivers purchasing electric cars, euro 6 emission vehicles .
281	<p>Allow Private Hire Cars to use the green ways</p> <p>Provide grants or interest free loans to buy electric cars or Euro 6 emission cars</p> <p>Stop allowing as many companies to dig up the roads at the same time.</p>
282	

283	Other measure should be reconsider that reducing speed all over the city making congestion and cause more time on the road, it doesn't mean the national speed limit within the town but 30mph is more appropriate to control the flow of traffic
284	Yes .stop digging up roads ALL OVER THE CITY.it causes more pollution with roads full off traffic.and cars and buses in the city polluting the Air !not just taxis and PHC Vehicles.
285	discount for drivers if they want buy new 0 emission vehicle
286	Change Bus lanes to lanes for multiple occupied vehicles and allow PHC drivers to use these lanes, said lanes would operate 24 hours a day seven days a week. Reducing emissions and benefiting passengers alike. Too many vehicles using bus lanes when they are empty.
287	Get rid of 10+ year taxi and phc
288	Let private hire vehicles into the green ways provide grants or interest free loans for drivers purchasing electric cars , Euro 6 emission vehicles.
289	Reduce the number of buses going through the city centre and ammend traffic lights to better suit emissions
290	Grants for purchasing electric vehicles.  PHC able to go in greenways.
291	Encourage taxi driver to go for electric or hybrid car by giving some finance schemes by councils..
292	Allow phc vehicles to use bus and greenway . Also allow them same priority as taxis.
293	Provide more taxi rank spaces so that they can be parked instead of driving aimlessly about the city centre looking for a space to sit.
294	Abandon 20 mph limit
295	Allow phc to use the bus lanes, getting to the there destination sooner, and more economical, and not caught up in congestion and adding unnecessary pollutants into the community
296	Let phone use greenaway.
297	Reduce fees, give financial support and interest free loans to drivers for buying low emissions vehicles, let Phc use bus lanes.  The council allowing a parallel fare structure like uber in the city has not just greatly affected all taxis private or otherwise . It also has an environmental impact that these drivers do double the miles to make a reasonable wage hence DOUBLE THE EMISSIONS
298	Allow PRIVATE HIRE vehicles to use the GREENWAYS.

299	<p>*Allow PHC vehicles access to greenways - whether the plate on a vehicle is a Taxi license or Private Hire license, the fact remains that a customer has opted to pay to get to their required destination, in the quickest and most efficient way.</p> <p>*Absorb at least 30% of low or zero emission vehicle cost.</p> <p>*Encourage businesses to take delivery at night where possible to reduce HGVs slowing the road network and causing slow traffic</p> <p>*Address some of the unnessecarily slow traffic lights, or lights where only 3 cars or 1 bus can get through per cycle.</p> <p>*I suspect the real reason for our air pollution lies within the some 180,000 vehicles navigating the city everyday, and not the mere 4,000 vehicles plying for hire. Our road network is struggling. Relentless road works, temporary traffic lights and the new 20mph limits have all contributed to the worst road congestion and air pollution of recent times.</p> <p>*Limit the number of Taxi &amp; PHC plates.</p> <p>*Congestion is the real problem here...</p>
300	<p>Had to change the vehicle is not that easy .other thing council can do emmisiin test when that need if is pass then drive other wise change bit not 2 years</p> <p>Our house hold based on this job we strongly say that is not fair for driver</p>
301	<p>The same policy whatever they introduce should apply to all vehicles and not just taxis and PHC</p>
302	<p>Give permission to private hire to use greenway</p>
303	<p>Let private hire vehicles into the green ways provide grants interest free loans for drivers purchasing electronic cars Euro 6 emission vehicles</p>
304	<p>Currently, PHC vehicles in Edinburgh are disadvantaged by not having the same dispensations as Hackney Cabs, e. g. not allowed on bus lanes, entry through bus gates or other such "privileges". This leads to increased stationery traffic and a greater build-up of pollutants. As such, bearing in mind that there are nearly 2000 PHC vehicles in Edinburgh compared with approx 1300 Hackneys, it is obvious that current policies are contributing greatly to p[ollution levels.</p>
305	<p>Why is the coucil not looking at there own vehicles like all the council owned bin motors or all the let buses that are driving around the city which are all diesel</p>
306	<p>Allow the PHC in the bus lanes to ease traffic congestion</p>
307	<p>Let PHC into green ways?</p> <p>Help with funding grants for people to afford newer cars?</p>
308	<p>Let private hire vehicles into the green ways Provide grants or interest free loans for drivers purchasing electric cars , Euro 6 emission vehicles</p> <p>Also limit the number of private hire licences allowed at any time</p>

309	Electric cars are the future for Edinburgh but Council need to build the infrastructure of charging points for those vehicles.
310	Let private hire vehicles into the green ways Provide grants or interest free loans for drivers purchasing electric cars , Euro 6 emission vehicles .
311	Edinburgh council should do their maths better. Issuing plates like hot roles to uber has not and will not encourage greener taxis and dropping the price of PH licences 'coincidentally' when uber came along. A 15 year old taxi does not pollute more than a 5 year old one - it's the same technology.
312	Let private hire vehicles into the green ways
313	Offer them a vehicle buying scheme where any phc or taxi driver would be accepted regardless of credit status. Vehicle would have to be offered at good price with low interest rates.
314	Let private hire vehicles into the green ways and provide grants or interest free loans for drivers purchasing electric cars, Euro 6 emission vehicles.
315	Allowing Private Hire Cars access to the green ways would reduce emissions from queuing in traffic at peak time.
316	To make it easier to buy low emission cars by setting up some type of a scheme or interest free loans. To put a limit on issuing more licenses on both drivers and cars.
317	Subsidise electric vehicles.
318	Let private hire vehicles into the green ways Provide grants or interest free loans for drivers purchasing electric cars , Euro 6 emission vehicles .
319	Let private hire vehicles into the green ways, provide grants or interest free loans for drivers purchasing electric cars, euro 6 emission vehicles.
320	To provide interest free loan for buy environment friendly new cars and bit high taxi fare for cover car price every month.
321	Actively promote hybrid cars and electrical cars.
322	Provide drivers with support in making their vehicles more compliant or assist in getting newer compliant vehicles. Same rules should apply to both black cab taxis and PHC.
323	Council can part exchange all the vehicle when it is absolutely necessary to replace the vehicle. If and when it will be obvious.
324	Allow phc drivers to use the green ways , council could give grants or loans to help with purchase of electric euro 6 standard vehicles
325	Get old cars/taxis off the road if emissions are too high especially when they are clearly blown black smoke out of exhaust pipes visible to police public and taxi inspectors please look at what a man from Mumbai has come up with a filter on tail pipe which catches carbon and makes black ink for art BBC news program
326	Allowing phc cars to use the bus lanes would vastly reduce emissions during rush hours

327	<p>Significant investment in safe, direct, attractive routes for active travel to encourage people to walk or cycle rather than driving or taking a taxi. And of course, associated bicycle parking and improved capacity for taking bicycles on trains and also buses.</p> <p>Reorganisation of bus routes to reduce numbers of empty buses queuing along city centre streets and radial routes.</p> <p>Presumed liability for accidents, this will help to ensure that those driving vehicles are more aware and more respectful of cyclists and pedestrians and therefore more people are likely to switch to active travel.</p> <p>Congestion charging for all private cars and vans entering city centre, including residents of the city centre.</p> <p>Sectorisation of parts of the city (widespread installation of bus gates) to discourage use of cars for short journeys especially across and near to city centre.</p> <p>Land Value Taxation to replace the Council Tax; this will make it easier for businesses to open closer to where people live, and also will lower house prices, making it easier for people to move close to their work - both will serve to reduce the need for frequent vehicle journeys.</p>
328	<p>Phase out motor vehicles. Stand up to the motor and oil industries who continue to benefit from continued motor vehicle use despite the well-known disastrous effects on the environment.</p> <p>Stop housing developments that encourage vehicle commuting (eg. Midlothian to Edinburgh). If people need to get in their cars to get a litre of milk, or have to travel five miles by car because there's no bus service, that's poor planning. Local services, eg. shops, cafe's, pubs etc. should be reachable without needing a car.</p> <p>Make cycling much safer - it's wrong to encourage it if it's going to put cyclists in danger.</p> <p>Penalise motor vehicle use and incentivise active and public travel. Hold private-car-free days and watch those particulate levels plummet.</p>
329	<p>Let PHC's use the greenway. Possible start a government funding scheme where owners can trade in their PHC's/Taxi's for an electric vehicle so it won't be so expensive for the individual.</p> <p>Make the roads 30 mph again (except by schools, hospitals, ect.)</p>
330	<p>Let private hire vehicles to use bus lanes in Edinburgh</p>
331	<p>Let private hire Vehicles in to the green ways Provide grants of interest free loans for drivers purchasing electric cars, Euro 6 emission vehicles .</p>

332	<p>PHCs should be permitted access to the Greenways at all times. It seems bizarre that these licensed vehicles are forced to drive longer routes when Greenways traffic restrictions are in operation. Longer routes means greater fuel use which automatically leads to increased emissions. Access to the Greenways for the very many hundreds of licensed PHCs in the city would significantly reduce the overall level and impact of emissions.</p> <p>All PHCs are now liveried with council and company stickers as well as PHC plates front and rear and are therefore highly visible and easily identifiable. The issue of other drivers following PHCs into the Green ways no longer exists. The Greenways restrictions also financially penalises the thousands of passengers with mobility difficulties and Taxi Card holders in general that cannot physically access Taxi cabs due to the particular nature of their mobility difficulty. It is also galling that non Hackney cab taxis from outwith the City of Edinburgh are permitted full and unhindered access to the city's Green ways.</p>
333	Yes
334	By encouraging drivers to buy low emission vehicle.by bring down the cost of the of the badge if say your vehicle is a 0 %emission vehicle
345	Allow private hire to use greenway will help
346	<p>metro cabs are too old....</p> <p>ghosts tour bus spits out more emissions than the whole taxi trade</p> <p>too many Uber (PHC) causing more emissions and a lot of Uber cars are that old i wouldnt even sit inside them.</p>
347	No more new licenses
348	Increase the speed limit back to 30 mph , let phc vehicles into the green ways , provide grants or interest free loans for drivers purchasing electric vehicles.
349	The cost of a zero emissions taxi is near £50k I'm not sure what it is for a phc. Also most taxis are double shifted.on the road 24h. How do the vehicles get charged? This will lead to taxi drivers unable to work.
350	Give financial help to owners. Years ago, the govt told us to ditch petrol & buy diesel. Better for environment. Because of companies falsifying emission figures, we are in this position. Owners have been guided by their lies.
351	not sure here but i know that we are being priced out of the market by the companies that we buy our vehicles from. we are now over run by phc and the not needed uber. it has got harder to run a cab and doing more hours which in long run affects our health.
352	Full statistics on the most polluting vehicles in Edinburgh are essential in this debate otherwise all comments regarding taxis and PHC are meaningless. What are the comparative pollutions emanating from buses/delivery vehicles/private cars/taxis&PHCs?
353	Remove the 20 mph currently active by a council that obviously needs attention

354	Yes - stop issuing new PHC licences when it was proven by CEC's own commissioned report by Halcrow that there was no significant unmet demand. The issue of approx 600 licenses to predominately older private cars significantly increased emissions in the city contradicting their own stated policy.
355	Council should help people by providing loans and grants for electric vehicles or low emission vehicles.
356	If the government where to subsidise taxi owners to switch to electric that would help
357	<p>Stop the scatter gun approach to road works in recent weeks we had leith st / Saint Mary's st and holyrood rd closed at the same time MADNESS ,get more cameras at lights to stop vehicles blocking junctions ,reduce the amount of tour buses at peak rush hour times , out with rush hour stop the tram -usually empty- getting priority at lights ,see princes st at south Saint David st ,Waverley bridge and Haymarket junctions</p> <p>There are now more Phc cars on the road than black cabs perhaps the total should be capped</p>
358	Let private hire vehicles into the greenways,Provide grants or interest free loans for drivers purchasing electric cars,Euro 6 emission vehicles.
359	<p>The Scottish Government could provide subsidies/scrappage schemes to help people convert from petrol/diesel engines to electric vehicles (cars and electric bicycles). More emphasis and incentives should be given on leaving the car at home for short journeys of up to 5km; currently around 70% of journeys in Edinburgh are 5km or less - distances that can easily be walked or cycled.</p> <p>The city should continue to invest in high quality walking and cycling infrastructure, and focus on separation of pedestrians, cyclists and motor vehicles to ensure that all transport users experience a minimal level of conflict.</p> <p>It is also important to maintain the accessibility and affordability of public transport for the city. Edinburgh's one of few cities seeing car use drop and public transport use increase so it is critical that new greenbelt housing developments are built with public transport in mind rather than car use dominating the developments - pavements are key to safe routes to school.</p> <p>In order to cut traffic on St John's Road we would also like to see more development/use of the Edinburgh Gateway station. This would be ideal to be developed as a bus interchange removing many of the long distance buses/coaches from the congested and polluted St John's Road.</p>
360	Are there grants available to help purchase the new electric LTI taxi as this is likely to cost somewhere in the region of £60k making it a false economy to do so?
361	<p>Let private hire vehicles in to green ways.</p> <p>Provide grants or interest-free loan for a drivers who wanted to purchase electric vehicles.</p>
362	Cease the amount of PHC and cap the amount of licences of PHC straight away then you will reduce the amount of vehicles on the street
363	Give subsidies for lower emission hybrid or electric vehicles

364	Engine replacement / scrappage scheme for engines failing emissions. To replace an engine costs approximately £5,000. A 20% Scottish government grant at a cost of £1000 per vehicle. Money would be partially recouped by greater tax revenues on the businesses which would be carrying out engine replacements.
365	The cost of a new taxi and phc are poles apart therefore different rules should be applied ie a new taxi can be up to four times more expensive than a phc .Please remember the rules were set by the council and it should fall on them to introduce legislation that reflects the cost of replacement vehicles in a fair manner and not as it is at the moment; heavily biased in favour of cheap phc vehicles
366	There is not only taxi and phc using out roads. Other ways of reducing emissions should be looked at before putting stricter rules in place for taxi owners. We are finding it hard to make ends meet and more expensive rules will eliminate the the taxi trade in a few years.
367	The only feasible way of making these changes fast would be to subsidise the replacement of old Taxis.  Unlike PHC's, Taxis are public transport assets that cannot be easily sold into the public domain, and abrupt changes could render many expensive Taxis useless.  As a public health concern, the cost of these changes should be largely met by the Country's authorities.
368	Phase in cleaner less polluting vehicles. It will need to be over a long period of time
369	If this what they want to do they should give us a grant for a new car
370	Make the drivers turn off their engines when on rank. Random tests on the street for emissions.
371	Let private hire vehicles onto the green ways, provide grants or interest free loans for drivers purchasing electric cars, Euro 6 emission vehicles.
372	Reduce the prices for new taxis maybe council should look at selling new taxis instead of cab direct who have no competition and just rip us off with inflated prices
373	Reduce the amount of PHC in Edinburgh,Edinburgh does not need this amount of PHC.  The sudden increase in the amount of licences issued to PHC has congested the city,this happened at a time when we were trying to REDUCE emissions.
374	Allow use of green ways for PHC vehicles
375	Provide subsidies to enable more business owners the opportunity to purchase cleaner greener vehicles more regularly
376	Stop putting on new phc every week
377	More control for old vehicles and not allow for bed.
378	Let private hire vehicles into the green ways.  Provide grants and interest free loans for drivers purchasing Electric cars.  Euro 6 emission vehicles.

379	Let private hire vehicles into the green way provide grants or interest free loan for drivers purchasing electric cars euro 6 emission vehicles.
380	In reducing the time that there is roadworks and temporary traffic lights in the city will reduce emissions - streamline the services that need to be carried out at any one time in high traffic areas.  Introduce days in the week when only certain vehicles are allowed to drive.  Switch off non essential traffic lights after 10pm to help with the flow of traffic and raise driver awareness.
381	The cost of replacing a black cab is already causing hardship to many owners
382	As taxi drivers we can not afford new cars to buy. Council should also consider subsidies towards taxi drivers as they are struggling now in competition.
383	If zero Emissions are the stated aim of the authority then more positive steps need to be taken to support the taxi trade to convert. The provision of fast charging points throughout the city either subsidies on the cost or lease of electric vehicles as the projected cost of the new London Taxi will place it beyond the reach of most current taxi owners. The move has to cover all forms of public transport . Other major contributors are commercial vehicles which should also be targeted.
384	As taxi driver we cannot afford to buy brand new car and going to pay high tax and other expensive
385	More spot checks on popular ranks at busy times from Taxi Examination inspectors and Council representatives would serve as a very powerful deterrent in getting owners and drivers alike to keep their vehicles cleaner and better presented there forcing more pride to be taken in their vehicle's presentation.
386	Whilst the rest of the industrialised world like China/India/USA carry on as normal does Edinburgh city council really think that all this nonsense will actually make any difference? Edinburgh is a small city in a tiny country at the back edge of beyond.
387	Car manufacturers are continually working on reducing the emissions for vehicles year on year. In West Lothian the PHCs have a limit of 150 g co2 which has in turn has worked well for them. Taxis are exactly the same manufacturers work to have these vehicles working to strict euro guidelines reducing their emissions also year on year.
388	Look at reducing the numbers of phc drastically, refuse to subsidise uber and subsidise the cost of electric taxis when they become available and are viable.  The council needs to seriously listen to the taxi trade as using a "big stick" and bringing unviable policies will not bring the result they are hoping for, it will just be the final nail in the coffin for the taxi trade in Edinburgh.
389	Introduce a wider policy of Parking Priority Schemes throughout City Centre and enhance existing ones to prevent commuters from bringing their cars into City Centre and Parking for free. i.e. enforce them to use sustainable transport such as bikes and buses or zero emission taxis.
390	The City of Edinburgh Council wishes to reduce air pollution, but increases the PHC fleet to 2000 vehicles within months thus making a mockery of their environmental credentials! Stop increasing licences that would be the first step.

391	<p>To reduce levels of air pollution the council could consider restricting more city centre streets to buses and taxis only. Also by extending parking restrictions to seven days instead of encouraging the public to bring cars into the city on a Sunday.</p> <p>As the number of PHC vehicles now outnumber taxis and given that they can be more easily sold on, the council should concentrate on limiting the age and emissions of PHC vehicles.</p>
392	<p>Allow Private Hire cars drive in green ways.</p> <p>Provide grants or interest free loans for drivers buying electric car or Euro 6 emission car.</p>
394	<p>You have to make sure there are sufficient charging/gas stations in Garages, the vehicles must give you the same as the owners get from the cars they own now. Every housing estate that is being built should have a charging station, if you did then more people may look to change cars.</p>
395	<p>I think all car should be eclectic and this could help for less pollution</p>
396	<p>A limit in PHC is essential, taxi licensing is limited and doesn't bring any further pollution to our city but a 40% increase in PHC licences has without doubt and will continue to do so until the first step is made!</p>
397	<p>stop the issue of new PHC plates and cap it at the current number which is far too high.</p>
398	<p>Apply the same rules to private hire cars that apply to black cabs regarding bus lanes and access to certain streets to cut journey times and also emissions.</p>
399	<p>The capital cost to replace a taxi is between £35-£45k. On top of this you have servicing costs, licensing costs, substantial road tax costs (as from March this year) as well as fuel and other incidental costs.</p> <p>Given the unprecedented rise in PHC vehicles over the last 2 years and the licensing of Uber as a company it is extremely difficult to make a living wage from the black cab trade, as the market is oversaturated. This can be witnessed by the over crowding at ranks with drivers forced to drive from rank to rank looking for a space. This in itself is creating unnecessary pollution, a problem that CEC could sort out. As an example, the busiest station in Scotland (Waverley) probably has the most inadequate taxi provision in the whole of Europe.</p> <p>In order for me to afford a new taxi the initial capital cost would have to be heavily subsidised by a scrappage scheme or grant. Also, as it is comparatively cheaper to purchase a PHC vehicle, the continued over licensing of the PHC trade will lead to more taxi owners being unable to purchase and run a new taxi.</p>

400	<p>Stop the 20 mile speed limit. It has been proven in many cities in England that it actually creates more pollution driving about in 2nd gear with your engine revving.</p> <p>For the safety of cyclists in Edinburgh it would have been more appropriate spending the £5 million on fixing the roads rather than wasting it on Signs &amp; Road paintings.</p> <p>The Black Taxis in Edinburgh are of a very good quality thanks to a very strong Police examination.</p> <p>As for the PHC car &amp; driver they leave an awful lot more to be desired. Causing many accidents from driving the wrong way &amp; not being able to understand basic English!!</p>
401	<p>If the council would give the taxi industry a fair playing field and stop putting more phc on the road, why can an ordinary person apply for a phc driving license and work the next day and pick up passengers when they do not know where they are going!!! But my daughter has just spent over a £1000 obtaining her taxi license, so she can do a proper job taking people from a to b.</p>
402	<p>Yes issue less PHC licences especially when there is no clear indicator that the number of PHCs needed to increase by so much.</p> <p>Secondly offer interest free loans to anyone replacing or buying a TAXI for the first time. Not for PHC as cost to put new car on road considerably less. Although would be unfair to not offer something to the PHC trade.</p>
403	<p>if you implemented to rid the city of older taxis what help cost wise would the council be willing to give with the costs as these new taxis are really expensive and with the council not putting a cap on phc licenses will it be cost effective for the black cab owners to afford new taxis???</p>
404	<p>Provide an affordable leasing option for electric or hybrid vehicles</p>
405	<p>Termination of further PHC licensing therefore allowing Black Cab drivers earn enough to replace vehicle when necessary.</p>
406	<p>Although this survey focuses on the polluting roles of taxis/PH vehicles, it is evident through driving a taxi (in my own case) that part of the pollution problem is caused by stationary traffic because of poor traffic flow management (notwithstanding the horrendous amount and frequency of roadworks). For instance, at certain points in the city centre there are so many busses concentrating at certain points that queues of idling vehicles are inevitable.</p> <p>Secondly, again when it comes to traffic flow, some junctions are terrible. Many need right filter arrows that allow right-turning traffic to actually operate effectively. Similarly, the seemingly inexhaustible mania for widening pavements beyond seeming need, has robbed many streets of left filters. Thus, where you have no right filter and no left filter, any vehicle at the front of a queue wanting to turn right holds back everything behind it - adding to pollution levels. The junction from Lawnmarket into George 1V Bridge is terrible at times with right-turning busses causing all sorts of jams.</p> <p>Thirdly - as with the filtering system, bus-stops extended so that all traffic behind a bus has to stop when the bus stops, also causes standstill, idling traffic. Morningside Road &amp; Grassmarket being cases in point.</p>

	<p>Edinburgh has at its disposal one of the best traffic management tools available to it, in my opinion, that simply isn't being used. That tool is its fleet of taxi drivers, who day in, day out see traffic flow issues first hand. I mentioned to a councillor years ago that the council should be utilising that continuously updated knowledge to manage traffic flows and volumes better by setting up a forum whereby drivers could highlight places, junctions etc where there are problems. I was told that as we weren't 'elected' people, we wouldn't be listened to.</p> <p>I still maintain that an official CEC forum whereby taxi (and bus drivers) can highlight traffic flow issues and have them read and acted upon by officials to put before councillors for consideration is one way to see where problems are arising and possibly head off more serious pollution problems before they happen. It may be a small measure, but it would be cheap and effective, I believe - and help pollution levels, as traffic would flow better and break up hanging pollution.</p>
407	<p>The grants would need to be of a reasonable amount as the vehicles will become more expensive to purchase, also what about charging points for 1330 taxis that need to be on the road 24/7 to pay. Air pollution levels scrap the 20mph now.</p>
408	<p>I as a owner have invested money over the years in purchasing a plate and cab and maintaining it to the highest standards as expected, been through several cabs from TX2, TX4 to Metrocab to even the new Mercedes and eventually back to the TX1 as i have found it to be the most reliable cab out of all and perfect for the streets of Edinburgh especially for the new speed limits put in place as it doesn't have the speedy initial take off of the new motors, if the government was to aid us in replacing the vehicle as we have ploughed so much into it over the years, they are not cheap to maintain to a high standard would be an incentive to change as it stands just now i think the majority would not be able to afford a new one as the work is not there like it used to be become saturated with PHC and UBER which i am not against as i believe competition is always good for business but at the moment the black cab trade is suffering so to to buy at the moment without any help is very difficult and because of the high amount of older cabs which are being used in Edinburgh if they were all to go then to find a rental would be difficult to find as well, a good number of cabs in Edinburgh are TX1s which have been regarded as bulletproof as they are made for the job easy to maintain so always ready for work, i would like to make my cab presentable as an example of what i think an iconic cab should look like, if you can keep them to a high standard then why let them go.</p> <p>Maybe in the somewhat future we can all move to electric as more electric cabs being brought into the market but still be a while yet.</p> <p>Also maybe allow buses taxis and cycles only in city centre as it is becoming increasingly busy in peak hot spots this would aid in reducing the pollution.</p>
409	<p>Remove all phc,taxis,buses and private vehicles more than 10 years old</p>
410	<p>Get rid of 20 mph and ease congestion by co ordinating roadworks far too many needless tailbacks caused by lack of consultation more and bigger black cab ranks as driving around only to find no space to stop</p>
411	<p>Let private hire vehicles into green ways, provide grants or interest free credit loans for drivers purchasing electric cars, euro 6 emission vehicles</p>

412	At the moment Birmingham city council is looking at an LPG project .I feel it would be positive if Edinburgh Council could look into this also.
413	Allow private hire vehicles onto the green way's also provide grants and interest free loans for drivers purchasing electric or hybrid euro emission 6 vehicles.
414	Let private hire vehicles into the green ways , provide grants or interest free loans for drivers purchasing electric cars, euro 6 emission vehicles.
415	let private hire cars use green ways and or interest free loans for driver to buy electric cars euro 6 emission vehicle
416	Regardless of the age of the private hire car as long as the emissions are low they should be allowed similarly with Taxi.
417	Let private hire vehicles into the green ways Provide grants or interest free loans for drivers purchasing electric cars, Euro 6 emission vehicles.
418	Reduce the number of PHC's
419	Let private hire vehicles into the green ways  Provide grants or interest free loans for drivers/owners to purchase electric cars, euro 6 emission vehicles
420	Let Private Hire Vehicles access to Greenways
421	Lift the 20mph limits
422	Allow phc vehicle's onto the green ways also provide grants and interest free loans to driver's purchasing electric or hybrid euro 6 emission vehicle's.
423	Council road policy in keeping the city running is appalling. Bus stops out in the carriage way,narrowing of streets,speed humps,road closures and now 20mph restrictions. Has the council ever thought it could actually be their policies that cause not only congestion but poorer air quality.  Also council licensing another 800 !! PHC cars to satisfy Uber smacks of something very dodgy. 800 !! How on earth does that help our city ? The cost to get a phc plate was even dropped just as the American tax dodging lot came to town. How about that for coincidence ??  Council must have a long hard look at their own road policies before hammering hard working Cabbies.
424	Let private hire vehicles into the green ways Provide grants or interest free loans to purchase electric vehicles Euro 6 emission vehicles
425	Private hire vehicles allowed onto green ways and drivers purchasing new hybrid and electric vehicles should be given grants and interest free loans
426	Let private hire vehicles into the green ways. Provide grants or interest free loans for drivers purchasing electric cars , Euro 6 emission vehicles .

427	Scrap the 20mph zones. Install more taxi ranks to stop taxis driving around needlessly burning fuel and adding to pollution. Remove/impound cars parking on ranks - same reason as above.
428	Let PHC into the greenways to reduce emissions and help with shorter journeys .Provide grants or interest free loans for drivers purchasing new or electric cars, euro 6 emission vehicles.
429	Allow PHC to use Greenways to help traffic flow and reduce omissions
430	Well, increasing the speed limit back to 30mph would help. Having traffic flowing better around the city would also help rather than stopping it at every opportunity.
431	Can't explain
432	To try hard to keep pollution low
433	Remove 20mph speed limit to reduce pollution and congestion in city. Traffic filtering should be checked and redesign. During Summer Time in City there should be no Road Works . Its cause of high density pollution. Interest free loan for PHC drivers to buy electric cars and maintain euro standards.
434	If forced to change vehicle the council/Scottish gov should provide low cost finance to all that have to change their vehicle
435	Less polluting vehicles
436	Let private hire vehicle into the green ways provide grant or interest free loan for drivers purchasing electric cars, Euro 6 emission vehicle
437	Edinburgh should move towards the same model as London and introduce electric taxis, with appropriate infrastructure, as soon as possible
438	Let private hire vehicle into green ways provide grants or interest free loans for drivers purchasing electric cars Euro 6 emission vehicle
439	let private hire vehicles into the greenways provide grants or interest free loans for drivers purchasing electric cars, euro 6 emissions vehicles.
440	Let private hire vehicles into the green ways Provide grants or interest free loans for drivers purchasing electric cars , Euro 6 emission vehicles .
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445	Let private hire vehicles into the green ways Provide grants or interest free loans for drivers purchasing electric cars , Euro 6 emission vehicles .

446	<p>I think that licence fees should be lower for lower emission vehicles and clearly higher for diesels of any sort.</p> <p>Convenient charging points should be provided and these should prioritise those drivers getting fares</p> <p>Maybe some sort of transitional fund - say interest free loans on new vehicles by drivers swapping to EVs and decommissioning diesels. Or help with leasing new tech while it is still early adoption.</p>
447	<p>For a start stop creating publications, questionnaires and briefing documents which seems to class Taxi and PHC as the same when they are totally different. In fact you should help educating the public of the differences. If anything you seem to be encouraging the blurring of the lines between the both. If you want to class them as similar make ever PHC to have meter. See how you get on with that with one of the "Technology" companies. Create a level playing field.</p> <p>To be honest if you wanted curb air pollution within the trade you should have capped the unprecedented rise in PHC which would totally wipe out any incremental difference between Euro 4, 5 or 6</p>
448	<p>Let private hire vehicles into the green ways Provide grants or interest free loans for drivers purchasing electric cars , Euro 6 emission vehicles .</p>
449	<p>Let private hire vehicles into the green ways Provide grants or interest free loans for drivers purchasing electric cars , Euro 6 emission vehicles .</p>
450	<p>Let private hire vehicles into the green ways Provide grants or interest free loans for drivers purchasing electric cars , Euro 6 emission vehicles .</p>
451	<p>Interest free loans to by newer cars.</p>
452	<p>Does the new law would apply to hybrid cars as well? I drive Toyota Prius hybrid car.pleae reply to this quarry at [REDACTED]@yahoo.com</p>
453	<p>They should help people who have bad credit in the past and issue interest free loans and make them cheaper.or hep the cab black trade move to electronic cabs.</p>
454	<p>limit the number of PHC.</p>
456	<p>Let private hire vehicles into the green ways Provide grants or interest free loans for drivers purchasing electric cars , Euro 6 emission vehicles .</p>
457	<p>There's not an electric taxi made that can do enough miles per shift my taxi is double shifted both drivers doing at least 130 miles per shift</p>

458	<p>There are approximately 1800 PHCs on Edinburgh's streets, some of them driving around plying for hire, others sitting with the engine at tickover to keep the heater or aircon going. Taxi ranks are overflowing because there is not enough work for them. This apparently causes obstructions, I am serious by suggesting these statements are linked. The oldest taxis on the streets are the LTI TX1, a reliable &amp; tough cab. Many owners have found out to their cost when they got an "environmentally friendly" Peugeot that, not only did they spend thousands buying it, that they then spent more time off the road because the engine, clutch, gearbox &amp; electrics were not up to the job.</p> <p>CEC would do well to realise that closing off side streets, (Leith Walk to Iona Street is one of them) &amp; all the street closures in the New Town since 1991 causes congestion. A frequent journey I get is Queensferry St to Stockbridge. This ought to be Charlotte Square, Glenfinlas St, Great Stuart St, Moray Pl, Doune Terrace, but no, we are forced onto Queen St &amp; Howe St, or across the Dean Bridge. More unnecessary restrictions are the Cowgate from 10pm which is widely ignored by all motor vehicles apart from black cab drivers, so we are forced to use Victoria St, Geo IV Bridge, Chambers St, Infirmary St. I could go on.</p>
459	Yes you could provide us with zero emission cars that will cost 41000.
460	PHC vehicles be let in the green ways . Loans and grants be put in place for drivers to purchase electric cars like Euro 6 emission vehicles
461	Allowing PHC cars on greenway
462	<p>Only in the period of a year CEC has added more than 500 private hire vehicles, which you continually keep printing and adding.. yet you are asking of opinion how to reduce pollution? Are you serious?</p> <p>If you don't cap the number of PH and keep going in line with Uber nasty politics of flooding and destroying taxi trades you are directly responsible for all the consequences which include higher level of pollution.</p>
463	Promote hybrid vehicles
464	One of the main sources of pollution in any town or city in the UK is from service busses . Electric busses are available now !They are a great application for electric vehicles with the size of the floor pan area enabling a substantial amount of batteries to be stored . They would be capable of working all day without charge. The only reason they are not used extensively is because a fuel rebate from the government makes them financially more expensive to operate . It is only because of the substantial subsidy from the government that we don't have Electric busses now !!
465	<p>The taxi test , does a emissions test, ! So if it passes the test what's the problem??</p> <p>The council is to blame for the high pollution in our city ,,!!</p> <p>If you would like to talk to me about the problem, phone me 07708459341,, I could highlight the problems in our city.!!!</p>
466	put the speed limit back to 30m.p.h. lower gears at 20m.p.h, produces more pollution and cause more wear and tare.

467	Let private hire vehicles into the green ways Provide grants or interest free loans for drivers purchasing electric cars , Euro 6 emission vehicles .
468	Reduce traffic lights, stop narrowing roads especially main arteries out of the city. Stop giving trams priority leaving huge tailbacks of traffic emitting fumes Prioritise cleaning up all the buses that are which are belching smoke into the atmosphere first, review bus routes taking them from the Royal Mile and any narrow streets that causes tailbacks . In short make Edinburgh move again.
469	Stop the 20MPH limit
470	Let private hire vehicle into the green ways provides grants or interest free loans for drivers purchasing electric cars ; euro 6 emission vehicles.
471	Let private hire vehicles into the green ways Provide grants or interest free loans for drivers  purchasing electric cars , Euro 6 emission vehicles .
472	Reduce Lothian buses
473	We need to consider the owners coz they create job and the cost of living is getting higher and new vehicle may result to many not in jobs but if we use technology can help to reduce emissions .Cost of renting is more than owning one yet Diesel engine can be added ad- blue to lower the emissions .this will be fair for both owner and lower emissions
474	Increase speed limits and congestion by improving infrastructure rather than putting more burden on the working class.
475	YES,STOP GIVING OUT PRIVATE HIRE PLATES LIKE CONFETTI.  MORE PLATES ISSUED MORE POLLUTION.
476	Get rid of the 20 mile an hour zones as these increase pollution.
477	Reduce private hire numbers and add more public hire plates !!!! PHC vehicles are sometimes very old and also some taxis as well so by adding to public hire and new plates being allowed on taxis 3 years old or newer we can reduce pollution because taxis are allowed on. Us lanes etc
478	Hybrid cars will be mandatory
479	For CEC to urgently implement a strong Low Emission Zone covering the city centre and other areas where air quality standards have been failed.  For the Scottish Government to financially incentivise CEC towards implementing said LEZ.

480	<p>Question 19 is nonsense as you are assuming that there will be a new generation of electric cars capable of doing the job, that you will have provided a full backup infrastructure to support such vehicles and that the price of conversion is affordable for the trade to pickup.</p> <p>Just as Taxi owners have to field approved vehicles for their business it follows that the Council could recognise certain cars deemed suitable for the PHC trade, so at a stroke you would have low emission cars or even zero emerging and over a reasonable period all cars would ultimately be fully compliant with the desired revised pollution levels, and of course the rationalisation of the PHC fleet would be a welcome product of such an initiative.</p> <p>A light touch on regulation desirable as technology is driving the change we all seek to push matters at this point will ruin businesses and place owner/drivers in financial straits.</p>
480	Install electric vehicle charging points in publicly accessible areas, which while not necessarily providing free electricity, would incentivise greater adoption of electric or plug-in hybrid vehicles.
481	Yes drop the 20mph zones would be great help
482	Ban sitting stopped with the engine running.
483	Let private hire vehicles into the green ways Provide grants or interest free loans for drivers purchasing electric cars , Euro 6 emission vehicles .
484	Raise speed limit. Stop congestion. Keep vehicles moving. Reduce number of unnecessary vehicles on the road.
485	Drivers need help from city council to by new car .. Long terms loan
486	Pedestrianise most city centre streets. Prevent motor vehicles from driving through the city centre, with the exception of buses (AKA filtered permeability). Taxis and PHCs to be fitted with mandatory GPS controlled speed limiters (to ensure adherence to 20mph limits). Taxis and PHCs to mandatorily attend eco-driving and cyclist-awareness courses.
487	It is easy to sit back and suggest such things with the best of intentions, but to maintain a taxi fleet under financial pressures, coatings must be part of the consultation, I do not see any costings here.
488	Let private hire vehicles into the green ways, provide grants or interest free loans for drivers purchasing electric cars , euro 6 emissions vehicles.
489	Re charging points, and access to priority ranks for zero Emission vehicles, eg at the train station
490	Get rid off 20 mile speed, because it's burn more fuel, mean more carbon foot print. Stop giving more new license. All the bus need to control the emission because they are five times more polluted than other vehicle.
491	Let private hire vehicles into the green ways Provide grants or interest free loans for drivers  purchasing electric cars ,

	Euro 6 emission vehicles .
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**Appendix 5 – Written Responses/Submissions**  
**Energy Saving Trust**

Terry Higgins  
Edinburgh City Council  
City Chambers Business Centre  
High Street Edinburgh  
EH1 1YJ

**energy**  
saving  
trust

14 June 2017

**City of Edinburgh Council consultation on an age limitation for licenced taxis and private hire vehicles**

Dear Mr Higgins,

I am writing to affirm the Energy Saving Trust's support for the City of Edinburgh Council's (CEC's) proposal to introduce an age limitation on the taxi and private hire cars (PHCs) licenced in the city.

It is now well understood that air pollution is a major health issue in towns and cities throughout the UK, with some estimates suggesting it causes tens of thousands of premature deaths in the UK each year. As you will already be aware, a number of roads in Edinburgh have been identified where pollution levels are particularly high and so pose a considerable health concern. As fossil fuel petrol and diesel road vehicles are major contributors to urban air pollution, concerted efforts need to be made to manage and reduce their harmful emissions.

In recognition of this issue, since 1992 European Union regulations have been imposed on new cars and light commercial vehicles, with the aim of improving emissions. These standards have been getting increasingly stringent over time to affect an incremental improvement in the emissions of new vehicles.

This means that older vehicles that comply with earlier Euro emission standards are more polluting than newer vehicles. Therefore, introducing an age limitation for licenced taxis and private hire vehicles has the potential to make an important contribution to managing and improving air quality. However, as Euro emission standards have been introduced at different times for different vehicle classes, and vehicle weights within vehicle classes, CEC should consider looking at different restrictions for licenced taxi and private hire vehicles based on when Euro emission standards came into force for different vehicle types.

For example, limiting taxis and private hire vehicles licenced in the city to vehicles registered after September 2009 would ensure that passenger cars licenced as private hire vehicles in the city complied with Euro 5 and Euro 6 emission standards. However



Energy Saving Trust  
Limited  
Registered in England  
and Wales No.02622374

Registered Office:  
21 Dartmouth Street  
London SW1H 9BP  
WT No.123 9638 27

there Euro 5 emission standard did not come into force for Hackney carriages until September 2010 (light commercial vehicles weighing 1760 to 3500 kg.) so some taxis licenced in the city would still only comply with Euro 4 emission standards, as would larger private hire vehicles.

It is therefore recommend that CEC look at introducing age limits for licenced taxis and private hire vehicles which take into account the dates when Euro emission standards came into force.

It is also important to note that there is significant variance in the extent to which different vehicles comply with Euro emission standards in real world driving conditions and therefore, whilst introducing age limits for licenced taxis and private hire vehicles can play a role in reducing road transport emissions, CEC should view an age limit as the first step towards facilitating the introduction of electric and plug-in hybrid ultra-low emission taxis and PHC.

It is likely that some taxi and PHC operators in Edinburgh will be less than supportive of CEC proposals to introduce an age limit; however it is important that CEC are aware of the support already available to operators to introduce new lower emission vehicles.

With funding from Transport Scotland, Energy Saving Trust provides interest-free loans of up to £100,000 to enable owners and operators of Hackney cabs to replace cabs that are more than 8 years old with new, efficient Euro 6 models.<sup>1</sup> Once ULEV hackney cabs become commercially available, Energy Saving Trust will provide interest-free loans up to £100,000 to replace diesel Hackney cabs regardless of age.

With funding from Transport Scotland, Energy Saving Trust also provides interest-free loans up to £100,000 to cover the cost of purchasing new pure electric and plug-in hybrid vehicles which could potentially be used by operators as PHCs.<sup>2</sup>

On the 13 June 2017 Minister for Transport and the Islands, Humza Yousaf announced an additional £8.2m of loan funding in 2017-18 and there is also Scottish Government commitment to continue to fund the loan scheme at least until 2020.

With funding from Transport Scotland, Energy Saving Trust also provides grant funding of up to 100% to support the introduction of charging infrastructure for electric and plug-in hybrid vehicles.<sup>3</sup>

<sup>1</sup> For more details see: <http://www.energysavingtrust.org.uk/scotland/grants-loans/low-carbon-hackney-cab-loan>

<sup>2</sup> For more information see: <http://www.energysavingtrust.org.uk/scotland/grants-loans/low-carbon-transport-business-loan>

<sup>3</sup> For more information see: <http://www.energysavingtrust.org.uk/scotland/businesses-organisations/transport/electric-vehicles-chargeplace-scotland>

There is therefore significant financial support in place to facilitate fleet renewal by operators in response to the introduction of an age limit by CEC and Energy Saving Trust can provide free advice and support to assist operators in managing this transition.

In summary Energy Saving Trust supports CEC's proposal to introduce an age limitation on the taxis and PHCs licensed in the city as a positive measure in managing a reduction in road transport emissions in the city of Edinburgh.

Yours sincerely,



Matthew Eastwood  
Head of Transport, Scotland

## Age Limitation of Taxis and Private Hire Cars Consultation Response

To: Licensing

From: Spatial Policy Team  
Planning & Transport

Date: 14 June 2017

### 1. Background

- 1.1. The City has five Air Quality Management Areas designated due to exceedance of legal standards of Nitrogen Dioxide, predominately a road traffic pollutant. There is one AQMA in respect to exceedances of PM10. European air quality standards are also being breached at certain location in the City.
- 1.2. Reducing the need to travel and promoting the use of sustainable modes of transport are key principles identified in the Council's Air Quality Action Plan to deal with these exceedances.
- 1.3. The Local Development Plan acknowledges that growth of the city based on car dependency for travel would have serious consequences in terms of congestion and air quality. So, an improved transport system, based on sustainable alternatives to the car is therefore a high priority and continued investment in public transport, walking and cycling are central tenets of the City of Edinburgh Council's Local Transport Strategy 2014-19. The Local Transport Strategy (LTS) also explains how Edinburgh's ~1,300 taxis are an important element of the public transport system, particularly for people who do not have access to a private car, and for people with disabilities.

### 2. Low Emission Zones (LEZ)

- 2.1. The Council has recently proposed to take a lead and work with the Scottish Government towards progressing Scotland's first Low Emission Zone in Edinburgh. The Scottish Government's current Programme for Government states that '...with the help of local authorities, we will identify and put in place the first LEZ by 2018...'
- 2.2. In Edinburgh, several different vehicle types will need to be considered including taxis and cars. This makes adoption of a Low Emission Zone complex; therefore, a phased approach is likely.
- 2.3. Currently it is not possible to define the timescales involved for these vehicles. Although it is not expected to be in 2018, it is recommended that the licensing regime takes cognisance of these plans and formulates a programme of taxi fleet improvement in this context.

### 3. Emission Standards

- 3.1. The Cleaner Air for Scotland (C<sub>A</sub>S) strategy working group whose members include Scottish Government, Transport Scotland, SEPA, NGOs and local authorities, is currently considering a national low emission zone framework. This framework will prescribe minimum emission standards for each vehicle

class that might be restricted within a defined geographical area, such as a low emission zone.

- 3.2. It is intended that these emission standards will be consistent across Scotland and with other such schemes in the UK. This will give greater certainty to fleet operators which operate across the UK and it will also hopefully ensure that older vehicles from other parts of the UK are not simply displaced to Scotland as a result of restrictions in other places.
- 3.3. It is likely that the emission standards for taxis and private hire vehicles will be Euro 6 diesel and Euro 4 petrol for both vehicle types.
- 3.4. These are consistent with the (minimum requirements for) UK Clean Air Zone Framework and the London Ultra-Low Emission Zone.
- 3.5. The emission standards would be the minimum that should be achieved. Local authorities could set stricter emission standards if deemed appropriate.
- 3.6. It is therefore recommended that the licensing regime in Edinburgh focuses on the Euro emissions standards to regulate vehicles, rather than the age of vehicles. It is also recommended that standards are set in line with the national approach.

#### 4. Diesel and Zero Emission Vehicles

- 4.1. Reducing levels of air pollution, especially from transport, will have positive impacts on health and lessen health inequalities. This will also reduce the cost burden on health and other services.
- 4.2. Some sources of air pollution cannot be easily controlled locally due to their transboundary nature, but traffic related air pollution is a major source that can be reduced through local action.
- 4.3. Specifically, in terms of diesel, evidence of its harmful effects is accumulating. The World Health Organisation International Agency for Research on Cancer concluded that particulate matter from diesel engine exhausts can be classified as carcinogenic to humans. Also identified was an increasing risk of lung cancer with increasing levels of exposure to particulate matter.
- 4.4. The Scottish Government has several existing commitments in respect to the national fleet, such as;
  - almost complete decarbonisation of road transport by 2050,
  - from 2040 almost all new vehicles sold will be near zero emission at the tailpipe, and;
  - by 2030 half of all fossil-fuelled vehicles will be phased-out of urban environments across Scotland.
- 4.5. In respect to the above evidence, we would support the phasing-out of the diesel engine from the taxi fleet as soon as reasonably practicable. We would also support plans to ensure all licensed taxi and private hire vehicles are zero-emission vehicles by 2030.

## 5. Recommendations

- 5.1. Although it is unlikely that taxis and cars will be affected by plans to have the first Low Emission Zone operational in Scotland in 2018, the licensing regime should take cognisance of the proposals to restrict these types of vehicles in the urban environment.
- 5.2. The licensing regime in Edinburgh should focus on the Euro emissions standards to regulate vehicles, rather than the age of vehicles in line with national policies to control vehicle tailpipe emissions. The Euro emissions standards set should also be in line with the national approach, as a minimum.
- 5.3. The phasing-out of the diesel engine from the taxi fleet should be undertaken as soon as reasonably practicable.
- 5.4. Plans to ensure all licensed taxi and private hire vehicles are zero-emission vehicles by 2030 are welcome and are consistent with national policy.

End/...

## **RESPONSE FROM THE LONDON TAXI COMPANY (LTC)**

### **INTRODUCTION**

LTC is the manufacturer of the world's only purpose-built mass market electric taxi. The company draws upon decades of UK automotive heritage, having built the iconic London taxi in the West Midlands for almost 70 years. Edinburgh is current one of our largest markets outside London, particularly for used diesel vehicles.

LTC's electric taxi is manufactured at a new purpose-built facility at Ansty. The facility is the result of a commitment to motor manufacturing in the Midlands and a £325m investment by LTC's parent company Geely. Ansty will also be home to Geely's global R&D function for EV technology, exporting innovation worldwide.

LTC's taxi is built at Ansty on an adaptable platform which will in due course pave the way for LTC to manufacture other electric commercial vehicles following the taxi's UK launch, the first of which will be a zero emissions-capable van.

These new LTC's vehicles have been designed not just for London, but cities around the rest of the UK and the world. LTC's new electric taxi will meet the global demand for a safe, clean, accessible taxi – as well as dramatically reduce operating costs for drivers.

We are keen to work closely with taxi drivers and passengers, as well as local governments to tackle the air quality crisis and bring pollution down to safe levels as soon as possible.

### **RESPONSE**

LTC welcomes Edinburgh City Council's intention to address air quality in the city by revising the taxi and private hire licensing policy. We agree that there is a real danger to the health and wellbeing of people in Edinburgh caused by poor air quality, and that this danger can be mitigated by taking the oldest taxis and private hire vehicles off the road. This means removing vehicles with lower emission standards from the road. We also believe that to encourage investment in vehicles, the Council need to set a long-term path way for drivers – gradually supporting them to move from more polluting vehicles to the latest ultra-low emission vehicles. This will reduce emissions whilst being mindful of the pressures that the taxi trade faces.

We would note that a significant proportion of Edinburgh's taxis are Euro 4 or earlier. So, to start to realise dramatic improvements in air quality in Edinburgh, the city will need to start getting these high polluting, vehicles off the road. We believe that conditions which focus on the emission standard would be more effective than the age limit, which is paired to the vehicle's date of registration and not its date of production. A measure linked to age limit could impact drivers who upgraded to cleaner vehicles some time ago and potentially leave polluting vehicles that were bought later on the road.

As such, in the near term, the city needs to place a requirement on operators to run Euro 5 standard vehicles or above. It should also set out a timeline for mandatory adoption of Euro 6 and then zero emission-capable vehicles – a policy mechanism adopted by a number of cities around the UK. This encourages drivers to invest in new, cleaner vehicles when their finance deals end allowing them to affordably upgrade their vehicles.

The consultation document also refers to the potential to retrofit older vehicles. From our experience from cities around the UK and around the world, we would advise against this approach in the strongest possible terms. We have yet to be consulted by a single firm offering conversions for our vehicles. As such, we can offer no guarantees about the safety of these converted vehicles, nor the quality and reliability of the conversion.

Finally, we would note that Edinburgh will need to make significant infrastructure investment before it is able to host an electric taxi parc of any scale. As such, it was a shame to see that the city did not apply for funding during the last OLEV taxi infrastructure fund competition round. With this near-term challenge facing electric vehicles, we believe that Edinburgh will have to focus on getting older, more polluting taxis off the road sooner, and walking drivers up through the various emission standards will be key.

### **Transport for Edinburgh**

**From:** George Lowder

**Sent:** 07 June 2017 12:36

**To:** Terry Higgins

**Cc:** [REDACTED]

**Subject:** TfE: Age Limitation of Taxis & PHCs (Air Quality)

Afternoon Terry;

As discussed, TfE would make 3 observations in relation to the consultation:

- 1.1• Taxis and private hire vehicles should be a component of the world class, integrated, environmentally-friendly and socially inclusive transport network that we are developing for the Edinburgh City Region. It therefore follows, that taxis and private hire vehicles should be world class, environmentally friendly and socially inclusive. Taxis and private hire vehicles provide complementarity, where the existing network ends or to fill gaps in the existing network and further customer choice.
  
- 2.1• To be a worthy partners in this, TfE would expect taxis and private hire vehicles to be; accessible, socially inclusive, healthy and sustainable. The plans of some taxi operators to move towards an electric fleet to serve city contracts is to be applauded. Significant fleet investment is being undertaken by Lothian Buses to meet 2020 emissions targets with a totally Euro 6 fleet and similar efforts by taxi and private hire vehicles should be encouraged by policy and quality partnerships.
  
- 3.1• There is ongoing work to better integrate taxis and private hire vehicles into existing and future transport interchanges, hubs and nodes. This is an area that is recognised for improvement.

Regards

*George*

George Lowder MBE | Chief Executive

Transport for Edinburgh Ltd

Chief Executive's Suite, 5th Floor, City Chambers, High Street, Edinburgh, EH1 1YJ

**UBER**

# UBER

## **Uber Response: Edinburgh City Council Age Limitation of Taxis and Private Hire Cars (Air Quality)**

Poor urban air quality poses a significant public health risk in cities like Edinburgh and undermines the overall livability of cities across the United Kingdom.

We therefore welcome Edinburgh Council's proposed aim of achieving a 100% zero emission licensed taxi and private hire fleet by 2030. We believe this aim is achievable and represents a strong long term commitment to improving air quality in the City.

In order to achieve this goal, the Council should implement a phased policy of vehicle improvement - beginning by removing the very oldest and most polluting vehicles from the City's roads.

As old diesel vehicles are disproportionately polluting in terms of NOx emissions, the short term focus of any new policy should be transitioning drivers in these vehicles into newer, cleaner models. In the medium term, a new policy could then seek to move drivers of all Internal Combustion Engine (ICE) vehicles into highly efficient conventional hybrids or Ultra Low Emission Vehicles (ULEV). Using this step-by-step approach, the Council's long-term target of achieving a 100% zero emission fleet of taxis and private hire vehicles by 2030 is highly attainable.

The key barrier to achieving a large reduction in harmful emissions is that newer, low emission vehicles (particularly ULEVs) are far more expensive to buy, lease or rent than their older ICE counterparts. It is therefore vital that the Council's phased approach gives drivers significant notice of when they will be required to replace their vehicle for a more efficient model, and offers incentives where possible for drivers to move into the most efficient vehicles. It is also crucial that the Council examines ways in which additional costs can be stripped out of the licensing process - helping to offset the additional higher costs of drivers moving to a lower emission vehicle.

In particular, the Council should examine its current vehicle licensing process in detail and propose ways in which the plating of newer, more efficient, vehicles can be accelerated. Based on recent experience, it can take up to six months for a new vehicle to be licensed by the Council - a clear disincentive to any driver considering replacing their existing vehicle. Current plans to increase the number of test ramps at the Taxi Examination Centre should help to improve this situation, but there is still room to go further.

If the Council's proposed policy is too stringent on emissions standards - or moves too fast for the supply of affordable low-emission vehicles to become available to private hire drivers - then the livelihoods of many drivers could be threatened.

It is also important that the installation of rapid charging infrastructure in the city keeps pace with regulation requiring private hire drivers to licence ULEVs. Without a comprehensive network of rapid chargers, the economics of driving a ULEV for private hire use are unviable. In a recent study of Electric Vehicle use for private hire conducted by Uber and Energy Saving Trust, well over 50% of drivers reported losing at least 10 hours a week of driving time through the inconvenience of having to recharge their vehicle.<sup>1</sup>

<sup>1</sup> [www.energysavingtrust.org.uk/uberEVtrial](http://www.energysavingtrust.org.uk/uberEVtrial)

Whilst Edinburgh is ahead of many cities with regard to the installation of a supporting rapid charge network for electric PHVs and Taxis, much improvement is still required before the network can support running large numbers of ULEVs.

Given this existing lack of charging infrastructure, it would therefore be inequitable to introduce a policy in the near future which only permits new/replacement licences to be issued to electric vehicles.

Taking these factors into account, if the Council wishes to introduce a new vehicle policy, we recommend it be phased in over time and centre around Euro emissions standards. The policy should focus on removing the oldest diesels first - and build incrementally towards 100% ULEV by 2030.

As petrol vehicles emit far less NOx than diesel models, they are treated as cleaner options, and should be accepted for licence for a longer time period.

Petrol-Hybrid vehicles are treated in similar fashion to ULEVs as NOx emissions from these two types of vehicle are comparable - with some petrol-hybrid models actually emitting less grams/KM of NOx than recognised ULEV models<sup>2</sup>. In the long term it is recognised that ULEVs provide other marginal environmental benefits over hybrids - for example lower CO2 emissions - leading the proposed policy to eventual phase out of hybrids. These marginal environmental benefits are however unrelated to localised air quality.

#### *Suggested Vehicle Emissions Policy*

##### *Existing Vehicles*

- Require all existing licensed vehicles to be at least Euro 4 petrol/Euro 5 diesel from December 2019.
- Require all existing licensed vehicles to be at least Euro 4 petrol or Euro 5 diesel from December 2021.
- Phase out all existing licensed diesel vehicles by December 2025. All remaining vehicles to be at least Euro 5 petrol, Hybrid or ULEV.
- Require all existing licensed vehicles to be ULEV by December 2029.

##### *Newly Licensed/Replacement Vehicles*

- Require all newly licensed/replacement vehicles to be Euro 4 Petrol/Euro 6 Diesel or Hybrid from January 2021.
- Require all newly licensed/replacement vehicles to be Euro 5 Petrol, Hybrid or ULEV from January 2022.
- Require all newly licensed/replacement vehicles to be Hybrid or ULEV from January 2025.
- Require all newly licensed/replacement vehicles to be ULEV from January 2028.

We believe this proposed policy presents the fairest and quickest way for the licensed private hire industry in Edinburgh to become 100% zero emission. It also provides significant short-term air quality improvements by phasing out the oldest and most polluting diesel vehicles in a short space of time. The longer term goal of moving towards large numbers of licensed ULEVs is dependent on the installation of adequate rapid charging infrastructure.

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<sup>2</sup> Mark III 2009 Toyota Prius Petrol Hybrid (which does not qualify as a ULEV) emits 6mg/KM of NOx. Volkswagen Golf 1.4 GTE Plug-In Hybrid (which qualifies as a ULEV) emits 17mg/KM of NOx.

Although this timeline will propose a significant financial challenge for some drivers being asked to change their vehicle for a newer, cleaner, and more expensive model, we believe this type of phased approach gives reasonable notice and opportunity to prepare for vehicle replacement. If timelines were shorter, the risk of causing financial hardship for drivers - even depriving some of their livelihood - would be significant.

In addition to addressing vehicle emissions standards, the Council should also consider the potential of new technologies - such as smartphone apps like Uber - to encourage more efficient use of vehicles. Through products like uberPOOL - Uber's licensed carpooling service - significant environmental savings have already been made by users choosing to share their car with another passenger for a cheaper fare.

As these types of services develop - together with greater numbers of people choosing to walk, cycle and take public transport - they have significant potential to reduce private car ownership in cities like Edinburgh. In the medium to long term, this type of modal shift offers a great deal of environmental benefit and should therefore be supported by the City Council.

## **ScotRail**

**From:** Michael Hall  
**Sent:** 07 June 2017 12:46  
**To:** Terry Higgins  
**Subject:** Scotrail: Consultation: Age Limitation of Taxis & PHCs (Air Quality)

Terry,

Thanks for the message.

ScotRail are happy to be involved with this issue as taxi's do form one of many mechanisms our customers use to access stations and thus trains.

We are implementing 50 electric vehicle charge points within station car parks between July and November 2017 and these will be free to use by any EV vehicle, whether it is a taxi or not.

If the car park is charged then the usual parking fee will apply.

ScotRail has ambitions to create a better environment; which includes clear air and less toxic emissions within our station environments.

Anything we can do help and support less emissions is being looked at and idling/waiting taxi's form a part of this equation and we would strongly support a regulatory taxi regime by Edinburgh council which promotes low or zero emission taxi's.

I believe Dundee council have had success in this area and are pioneers across Scotland and the UK and I am sure they would be keen to share best practice.

Regards,

Michael Hall BA Hons PGCE  
Transformation Manager - Car Parking

ScotRail  
50 Waterloo Street  
Glasgow  
G2 6HQ



**City Cabs (Edinburgh) Ltd**



## CITY CABS (EDINBURGH) LTD

1A ATHOLL PLACE – EDINBURGH – EH3 8HP

Taxi Booking: 0131 228 1211

Accounts Office: 0131 228 5349

Fax: 0131 228 7939

e-mail: [enquiries@citycabs.co.uk](mailto:enquiries@citycabs.co.uk)

To Whom it may concern.

City Cabs (Edinburgh) Ltd would like to put forward this submission with regard to the City of Edinburgh's consultation process, which is looking at the prospect of introducing an Age Limitation of Taxis and Private Hire vehicles.

The Transport 2030 Vision, published by the City of Edinburgh Council, and the commitment made by the Westminster Government to ban all new petrol and diesel cars with effect from 2040 suggests that the sooner we start tackling this issue, the easier the transition will be.

City Cabs recently joined with the City of Edinburgh Council, OLEV and Edinburgh University in looking at the feasibility of growing the number of charging stations throughout the City, as well as the viability of introducing electric vehicles into our fleet. City Cabs are currently in the process of installing two rapid chargers in our car park at Atholl Place, EH3 8HP. The London Taxi Company has also recently launched a range extender electric vehicle, and we intend to monitor its success. However, the starting price of £55,000 plus is not sustainable in the present Edinburgh taxi market place.

One key development in the field of measuring emissions is the new equipment that is being used to accurately measure not just Carbon Monoxide (CO) but also Nitrogen Oxide (NO<sub>2</sub>). This has brought about a desire for general change to improve the air quality in our city centres. Interestingly, recent reports suggest that it is not necessarily older vehicles that pollute the most.\* <http://bit.ly/2vRqT1M>

No one can argue that change must come about, but the main challenge will lie in how this change is implemented, how to move traditional services into new ways of thinking and how to work with minimum disruption to the present service provided. The target should be to change things naturally as opposed to forcefully pushing through overly heavy legislation. Major factors in all of this change will be the advancement in battery technology and the development of the charging infrastructure.

The City of Edinburgh has, traditionally, had an excellent reputation for having a first class taxi fleet, where 75% of the fleet is less than five years old. This has been achieved through inward investment and commitment by the individual taxi operator. As the move to cut down emissions has moved forward over the last 10 – 15 years so has the cost of the vehicles available for this purpose. They now range in cost from £44,000 to £55,000. As you would expect, this level of investment from a sole trader can only be justified if there are both reasonable expectations of being able to run such a vehicle as well as the ability to earn a living wage from it.

It is regrettable that inward investment levels by individual Edinburgh taxi-licence holders has fallen significantly in recent times due to a drop in overall job totals, as well as the recent introduction, from a sector of the trade to the low-level GIG economy, with up to 25% of the Trade's overall revenue disappearing to overseas investors. It appears that the Trade is moving towards a part-time transient work force with little scope for the inward investment required to sustain a modern day low-emission fleet of vehicles. The main cause of this is the rapid and insatiable growth of the private-hire element within Edinburgh, which appears to be encouraged by the City of Edinburgh Council.



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[www.citycabs.co.uk](http://www.citycabs.co.uk)



The fairly recent decision by the Licensing Sub-Committee to substantially cut the cost of applying for a Private Hire licence, which, incidentally, seemed to coincide with the arrival of these now familiar Transportation Platform type services, has meant that more and more Public Hire licence holders are looking to cut their costs in order to survive. It is simply just not economically viable to consider investing £44,000 - £55,000 in a business that is failing.

There has always been an understanding that if the City of Edinburgh is to enjoy a taxi service that is of a reasonably high standard, certain restrictions and regulations should be in place. The introduction of a low-level entrance fee plus the option of putting on an aged vehicle within the Private Hire sector of our trade has meant, along with the huge increase in numbers, that the Public Hire Taxi sector is being forced to seek options other than purchasing new vehicles. We are sourcing low-mileage, well-maintained ex-London privately operated TX1 cabs, sometimes 16-20 years old. This choice is not a preference but is a practical one if we are to remain competitive.

For some time now the taxi representatives have been asking that the Licensing Department consider the current fee structure, which was changed only a relatively short time ago. This structure places a penalty on any licence-holder who puts on a new, low-emission vehicle. When a new low emission vehicle is presented at the Cab Office for its inspection, it has to pay the full inspection fee of £338 plus an additional £54 fee for a variation of licence..... £392 in total. The actual examination process for a new low emission vehicle, when presented at the Cab Office, takes 20 minutes to complete, including the processing of the Variation Licence. The normal inspection for an existing, older vehicle takes a full hour and costs £338. It is areas like this that should perhaps be reviewed by the City of Edinburgh Council if it wants to promote a low emission fleet. The Scottish Civic Government Licensing Act states that "differing levels of fees should bear an obvious relationship to costs incurred" ( Page 40 Section 12). The example above clearly does not follow this directive.

The Taxi Trade, unlike almost all other forms of public transport, is not subsidised in any way, while almost all bus companies enjoy heavily-subsidised fuel grants. If the Taxi Trade is to remain a quality, viable business, able to stand on its own two feet, retain the ability to invest in new low-emission vehicles and embrace the new challenges that the City of Edinburgh Council's 2030 vision poses, it is obvious that some balance in numbers is required.

The prospect of having no-go, low emission zones imposed throughout the City, that the majority of both Public and Private Hire vehicles will be prohibited from accessing it is in no one's interest. The Public Hire Trade does not seek any form of protection, but we would like Elected Members to consider the overall effect of the current free for all strategy.

To transit from the present existing fleet of diesel taxis over to low-emission hybrid or electric vehicles, would require either subsidisation by the Government or Local Authorities or self-financing by the individual licence-holder. As we all know, in the present financial climate, subsidies are not available, so self-financing by individual licence-holders is the only option. For this option to be viable, the City of Edinburgh Council will have to review both their current policy for licensing new vehicles and the current fee structure.

As already mentioned, the vast majority of public transport providers are subsidised, but the Edinburgh Taxi Trade receives no subsidies whatsoever. The level of service provided by operators within individual local authority areas varies widely. The quality of both vehicle and driver is determined by the standards set down by these local authorities, and it is generally accepted that the taxi trade plays an important part in promoting the vibrancy and accessibility within any City.

In this particular case, it will also have an important part to play in improving the quality of air in our City if we are given a chance to survive!

Yours sincerely,

Les McVay  
Company Secretary

**Central Radio Taxis (Tollcross) Ltd**

**From:** Keith McCall [mailto: [REDACTED]]  
**Sent:** 24 August 2017 14:22  
**To:** Terry Higgins  
**Subject:** Age Limits, Final submission

Terry,

Thanks for allowing Central the opportunity to present a written response to the recent age limits consultation for taxis and private hire vehicles.

#### 1. Cost of Vehicles.

A new TX4 was £30,485 in 2011, today it is £45,945. The new TX5 is £56,995 with government grant A new Peugeot E7 was £30,495 in 2016 but is no longer available. The replacement Ford Procab will be £35,495 when(if) passed by examination centre.

The Mercedes taxi was £38,495 in 2016 and is now £43,495.

These prices show a dramatic rise in the cost of a new vehicle in recent years and represent a significant investment for owner operators. Given the current climate in the industry I would very much doubt that anyone will be prepared to purchase the new TX5 at that price considering that Edinburgh is currently 198 in the PHTM table of taxi fares throughout the U.K, and the uncertainty which surrounds the trade currently.

Until there is a low cost, low emission vehicle available for use as a taxi, we are of the opinion that any restriction on age/emissions is unworkable in Edinburgh, because replacement vehicle cost is so high.

If CEC are to adopt an age limit on vehicles, we would like CEC to consider how operators are supposed to dispose of these vehicles at the end of their working lives given that other councils are likely to follow with a similar approach to restrictions, rendering the vehicles redundant.

Further to this, there appears to be no action being taken by CEC to stop the relentless licensing of Private hire Vehicles which has seen numbers more than double to almost 2,000 in the space of 18 months. Operators are rightly sceptical of what the future holds for the trade and are reluctant to make such massive outlays as detailed above.

Central Taxis are proud of the high standard of taxis we offer and are willing to work with CEC and The Scottish Government to improve these standards further, however we need the assistance of regulatory bodies to secure a prosperous future for the trade.

To encourage drivers to change to cleaner vehicles, annual licensing costs should be reduced as a first step in conjunction with 0% loans and government grants.

#### 2. Private Hire

Taxi drivers do not have the same choice of vehicles as PHC operators do. A brand new low emission PH can be purchased for a fraction of the price of an M1 taxi. It will also be easier for operators to dispose of these vehicles at the end of their working lives into the used car market.

The increase in PHC number detailed above will be contributing significantly to pollution in the city. By restricting new license applications for PHC to Ultra low emission vehicles(ULEV's) and license renewals to vehicles less than 5 years old this would help air quality hugely in the city.

Operators such as Uber have benefited hugely from the council policy to reduce the price of a PHC license so perhaps now is the time to ask them to improve their fleet of vehicles to meet strict conditions.

Because the entry level for a PH license is so low, the traditional taxi trade has seen a drop in the number of drivers available to cover shifts. Most new drivers will prefer to work for Uber because the price of a vehicle license and the ease with which they can acquire a driver's license compared to the rigorous taxi application process. This has resulted in a significant drop in rental income for operators, which is another factor when considering replacing a vehicle. Taxis need to be on the road 24 hours a day, 7 days a week if it's full potential is to be realised.

As the number of PHC vehicles continue to rise, the pool of work per vehicles reduces which results in a lower income per car, making affordability of cleaner replacement cars less likely.

We are not suggesting that taxi operators are allowed to continue to run older polluting vehicles forever as we would like to see an improvement in the city's fleet overall, but as we are so restricted in affordable vehicle choice currently, the trade needs time to seek viable alternatives from manufacturers.

Other licensing areas recognise the cost of putting on a purpose built taxi as opposed to a saloon car and have introduced a system whereby the age restriction of a taxi is higher than that of a PHC.

The Scottish Government should also be assisting public hire taxi drivers to achieve their air quality targets by incentivising drivers to replace vehicles. We are aware that The Government currently offer 0% loans on vehicles over 8 years old and if limits are introduced we suggest that this age should be lowered, along with higher grants for the cleanest available vehicles.

### 3. Alternative Strategies to improve air quality.

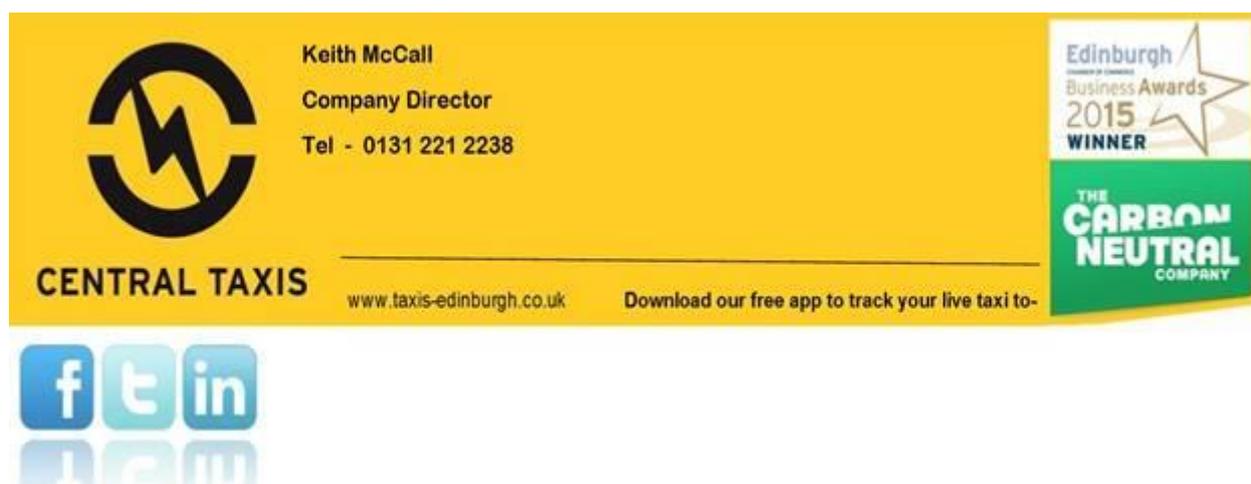
Park and rides, congestion charging, a ban on general traffic in the city centre, daytime parking restrictions in suburbs to encourage greater use of P&R and public transport.

Edinburgh sees an influx of vehicles into the city every day from outlying areas such as West Lothian, Fife, East Lothian, Midlothian and further afield. A congestion charge could help to ease this problem in conjunction with limited time on street parking in the suburbs. Commuters can easily drive their car into areas such as Portobello, Corstorphine, Gilmerton and others to dump their cars for days at a time if they want and hop on a local bus into town. These should be using Park and Ride facilities and a congestion charge might well encourage them to make better use of them.

Finally, our submission may seem like we are opposed to this consultation. We are broadly supportive of a phased introduction as and when affordable vehicles become available.

Keith McCall

Company Standards Director



The banner features a yellow background with a black circular logo containing a lightning bolt. To the right of the logo, the text reads: Keith McCall, Company Director, Tel - 0131 221 2238. Below the logo is the text 'CENTRAL TAXIS'. At the bottom left of the banner are social media icons for Facebook, Twitter, and LinkedIn. At the bottom right, there is a green box with the text 'Edinburgh Business Awards 2015 WINNER' and 'THE CARBON NEUTRAL COMPANY'. The website address 'www.taxis-edinburgh.co.uk' and a call to action 'Download our free app to track your live taxi to-' are also present.

### United Private Hire Drivers (Edinburgh)

**From:** Edinburgh PHDA [REDACTED]

**Sent:** 23 August 2017 21:56

**To:** Terry Higgins

**Subject:** Vehicle Age/Emission Restrictions

Dear Terry,

Further to the recent consultation regarding vehicle age and/or emissions limits. I wanted to write to clearly state our views on this consultation.

There are a large number of vehicles within both the Private Hire and Hackney trades that fall short of our recommendations; these vehicles however continue to be licensed as they meet the current conditions of fitness.

We agree that the conditions of fitness need to be reviewed and updated to recognise the advancements in vehicle technology and the availability of Low Emission Vehicles (LEV) and Zero Emission Vehicles (ZEV).

We acknowledge the benefits an improved hire car fleet would bring to the City and the significant reduction in harmful emissions which could be attributed to the current fleet. Private Hire Operators have already been investing in Hybrid Vehicles, PHEV and full Electric Vehicles (EV) for a number of years and there is growing interest in EV's. I have been driving an Electric PHC for the last 4 months to evaluate the vehicle and discover issues that drivers might encounter when they begin to operate an EV; and to gauge the public's reaction to these vehicles. I'm bound to say that EVERY SINGLE passenger has been very impressed with the vehicle and the ride experience. It's also worth noting that not only will these vehicles contribute a significant reduction in harmful pollutants but also the welcomed reduction in noise pollution, especially during the early hours.

Whilst the current capital cost of an EV is higher than diesel/petrol models it is not restrictive. The cost of ownership is greatly reduced in maintenance and servicing costs not to mention volatile fuel costs. The removal of deisel/petrol costs could also result in a lowering of tariffs, or at least the tariffs will have more resilience to external external fuel price fluctuations.

We would support an age restriction of 10 years but this was historically challenged by a hackney operator arguing that his vehicle was single shifted and had done half the mileage of a double shifted vehicle and regardless of that, it was able to meet the established conditions of fitness and cab test.

We feel it would be better to go down the emissions route and reccomend that no vehicle below the Euro 5 standard should be licensed

Yours sincerely,

Mark Greenhalgh

(Chairman)

United Private Hire Drivers (UPHD)

**Appendix 6 – Additional Information – E.V. Chargers, Traffic Control & Council Fleet**

**The City of Edinburgh Council – Environmental Health**

**From:** Andrew Campbell  
**Sent:** 09 August 2017 16:52  
**To:** Terry Higgins  
**Subject:** RE: EV Chargers

Dear Terry,

The Council recognises the need to both encourage the uptake of electric vehicles across the city as well as ensuring that appropriate charging infrastructure is in place for a range of users. The Council is currently in the process of developing its first Electric Vehicle Strategy aiming to take this to Committee in the autumn. The new Strategy will have actions designed to address a range of technical issues. These include the criteria and guidance to apply when selecting chargers, the appropriate strategic locations across the city for charging hubs, maintenance and operation of chargers and the linkages with other key partners such as the city car club. Currently there are (as of December 2016) 141 electric vehicle charge points sited across 60 locations for a mix of public and non-public use. However, to date all of these charge points have been installed in off-street locations. The need to significantly increase the number of on street charging points is fully acknowledged as a key to the significant uptake of electric cars. You can access the map which shows the location of all the charging points in the city at [Charge Your Car](#).

The EV Strategy will also outline the reasons why electric vehicles should be promoted and encouraged, such as the positive impact it will have on Edinburgh in terms of meeting it's CO2 emission targets and improving the city's air quality.

The Marchmont and Sciennes pilot of on-street charging infrastructure will be the first on-street trial in Edinburgh and will help to define the future roll-out of on-street charging infrastructure in the city. In support of the on-street pilot project the Council was required to promote Traffic Regulation Order (TRO) changes. This statutory process has taken around nine months to deliver but is now complete enabling the Council to proceed with the advanced site works and the procurement and installation of the five EV charger units. The information from the pilot will be invaluable in developing the work further. The Council is also developing a new procurement contract for the supply, installation and maintenance of EV chargers. This will streamline the Council's delivery approach and in the future help expedite any further charging infrastructure rollouts. As the framework is expected to be in place soon, the intention is to utilise it as part of the Marchmont and Sciennes Pilot rollout.

We have had an increased number of similar enquires throughout the city, but especially in areas of high population with no access to private car parking. We have a database recording the locations where people want chargers installed, this will assist with prioritising the future roll out of chargers.

Kind regards

Andrew Campbell | Environmental Health Officer | Environmental Protection | Housing and Regulatory Services | Directorate of Place | The City of Edinburgh Council | East Neighbourhood Centre 2.03, 101 Niddrie Mains Road, Edinburgh, EH16 4DS | 0131 [REDACTED]  
[REDACTED]

**The City of Edinburgh Council - Planning & Transport**

**From:** Andrew Easson

**Sent:** 10 August 2017 09:46

**To:** Terry Higgins

**Cc:** [REDACTED]

**Subject:** RE: Question re traffic measures

Hi Terry,

I am responsible for the ongoing citywide roll out of 20mph speed limits and the impact of this on air pollution is a subject that regularly comes up. I will ask one of the 20mph team to provide you with some text that we use to respond to these enquiries.

The use of speed humps in residential areas is historical, because this used to be required by legislation before you could introduce a 20mph speed limit. Legislation has now

changed so that this is no longer necessary and the current roll out does not involve any new speed humps, being achieved by signs and road markings only.

Speed humps would only now generally be installed by the Council in streets where there is a demonstrated speed related safety issue (i.e. where there is a record of people being injured in speed related accidents). I cannot think of any examples of this happening in recent years.

There are, however, no plans to remove existing speed humps.

The impacts of the 20mph roll out are being monitored and will be reported to Committee a year after the completion of the roll out (which is expected to be early in 2018). It is possible that Committee may then (i.e. in early 2019) decide that additional measures need to be taken in some streets, if there is evidence of a high rate of non-compliance with the new 20mph limits, and one of the possible measures that could be considered at this stage would be speed humps.

Andrew

## **The City of Edinburgh Council – Road Safety & Active Travel**

**From:** Eileen Hewitt

**Sent:** 09 August 2017 17:04

**To:** Terry Higgins

**Cc:** [REDACTED]

**Subject:** 20mph - Emissions

Hi Terry

Studies have so far not conclusively proven either a positive or negative effect on emissions: driving at 20mph causes some emissions to rise slightly and some to fall. Research indicates that at slower speeds, vehicles flow more smoothly through junctions. As such, within an urban environment, 20mph may help to improve traffic flow. In addition, as a result of reduced acceleration and braking, 20mph may help to reduce fuel consumption and associated emissions. Some environmental benefit from the change is expected from helping to unlock the potential for walking or cycling short distances instead of driving.

A [report](#) on the environmental impact of 20mph speed limits in central London provides further details of research that has been carried out.

Regards

Eileen



Eileen Hewitt | Professional Officer | 20mph Programme | Active Travel and Road Safety | Place | City of Edinburgh Council | C:2 Waverley Court | 4 East Market Street | Edinburgh | EH8 8BG | 0131 [REDACTED] | [20mph@edinburgh.gov.uk](mailto:20mph@edinburgh.gov.uk) | [www.edinburgh.gov.uk/20mph](http://www.edinburgh.gov.uk/20mph)

## **The City of Edinburgh Council – Fleet Services**

**From:** Pat Traynor  
**Sent:** 10 August 2017 08:01  
**To:** Terry Higgins  
**Subject:** RE: Council Electric Vehicle Fleet

Hi Terry

We currently operate 27 electric powered vehicles and aim to have our car and light van fleet on a 5 year replacement cycle going forward.

Regards

*Pat Traynor | Fleet Maintenance Manager | Environment | The City of Edinburgh Council | Fleet Service 38  
Russell Road | Edinburgh | EH11 2LP | Tel: 0131 [REDACTED]*

**The City of Edinburgh Council – Planning – Spacial Policy**

**From:** Shauna Clarke  
**Sent:** 23 August 2017 16:12  
**To:** Terry Higgins  
**Subject:** RE: Question re traffic measures

Hello Terry

The Council, has an Air Quality Action Plan to address areas of poor air quality which have been identified though our statutory duties of reviewing and assessment air quality (Local Air Quality Management). The Action Plan sets out measures to be put in place in pursuit of bringing pollution levels within legal standards.

One of the main elements of this Action Plan is to improve traffic flow and ease congestion by using intelligent traffic signals in areas of poor air quality.

Additionally, the Action Plan alongside the Local Transport Strategy, aims to promote model shift away from car use, predominately by means of an Active Travel Action Plan (ATAP), which is also supported by other policies such as the 20mph, improving public transport etc.

The Council's Air Quality Annual Progress Report summarises all the work being undertaken by the Council to improve air quality and details the progress that has been made. This report can be found here; [www.edinburgh.gov.uk/airquality](http://www.edinburgh.gov.uk/airquality)

Hope you find this useful.

Please let me know if you want to discuss any further.

Kind regards,

Shauna

Shauna Clarke | Environmental Health Officer | Place Directorate | The City of Edinburgh Council | Tel 0131 [REDACTED] | [www.edinburgh.gov.uk/airquality](http://www.edinburgh.gov.uk/airquality)

## **Appendix 7 - Summary of Local Authority Vehicle Age Limitations**

### **Transport for London**

London will introduce the world's first Ultra Low Emission Zone (ULEZ) in 2020.

- From 1 January 2018 all taxis licensed for the first time must be zero emission capable, while new diesel taxis will not be allowed in London.
- From 1 January 2023 all vehicles granted a private hire vehicle licence for the first time will be zero emission capable regardless of age. To achieve this
  - In advance of the ULEZ requirements, all private hire vehicles licensed for the first time between 1 January 2018 and 31 December 2019 must feature a Euro 6 petrol or diesel engine, or a Euro 4 petrol-hybrid engine.
  - From 1 January 2020 all new private hire vehicles – defined as those under 18 months old –when licensed for the first time will have to have to be zero emission capable.
  - Older private hire vehicles – those over 18 months old – will need to feature a Euro 6 engine when licensed for the first time between 1 January 2010 and 31 December 2022. They will also need to be zero emission capable from 2023.

### **Birmingham City Council**

- New Hackney carriage licences will only be granted in respect of brand new vehicles.
- Hackney carriage vehicle licences may only be transferred to another vehicle that is younger/newer than the age of the vehicle currently licensed.
- PHV licences will only be granted in respect of vehicles which are less than 8 years old.

This policy is subject to review. The UK Government was taken to court by the environmental pressure group called Client Earth. The Supreme Court ruled that the government's plans to improve air quality were inadequate. Birmingham, together with other English cities, has been told by the Government that it must introduce Clean Air Zones (CAZ) to improve air quality in the city centre by 2020. Birmingham is aiming to have a CAZ in place by 2019 and recently conducted a consultation seeking views on proposals to introduce emission standards for licensed vehicles.

### **Aberdeen City Council**

- Accessible taxi vehicles must be 10 years old or less at first licensing and at substitution. All other taxi vehicles must be 5 years old or less at substitution.
- Private hire car vehicles must be 5 years old or less at first licensing and at substitution.
- There will be a general exemption from the age limit for any vehicle presented as a private hire car at first licensing prior to 6 June 2018 which, immediately prior to the date of application, operated as a licensed taxi vehicle in the city of Aberdeen. (Note – this exemption is to assist with the transition of hire cars to wheelchair accessible vehicles).

### **Dundee City Council**

- Applicable from 1 September 2016 all new licences granted for taxis and PHCs will have a condition that only an electric vehicle from an approved list of vehicles can be placed on service and any subsequent replacement vehicle must also be from the approved list of electric vehicles.
- Applicants operating as airport transfer ONLY vehicles may apply for a variation to dis-apply the electric vehicle condition.

### **Glasgow City Council**

- No taxi licence will be issued in respect of vehicles whose first date of registration was greater than 5 years before the date on which the vehicle details for an application for a licence or substitution of a vehicle were declared unless that vehicle had been licensed by the Council within the previous 12 months.
- PHCs must be not more than 5 years old from the date of first registration when first licensed by the licensing authority with the further restriction that when the vehicle is 7 years old from the date of first registration it must be taken out of service and replaced.

### **West Lothian Council**

- There is no age limitation in respect of taxis or PHCs.
- Since 23 November 2009 all PHCs must have a maximum CO2 emission level of 150 g/km for diesel vehicles or a maximum CO2 emission level of 165 g/km for petrol vehicles (with the exception of tail lift vehicles which must have a maximum CO2 emission level of 225 g/km for diesel or petrol vehicles).