

Regulatory Committee

9.00am, Friday, 16 March 2018

Consultation Conclusion: Demand for Taxis within the City of Edinburgh

Item number	7.2
Report number	
Executive/routine	
Wards	Citywide
Council Commitments	N/A

Executive Summary

The Council has a policy of limiting the number of taxi licences issued within the City, utilising the powers available to it under Section 10 (3) of the Civic Government (Scotland) Act 1982. This power can only be used if the Council is satisfied that there is no 'significant demand' for taxis which is unmet. The Council is required to keep this position under regular review.

Demand is reviewed regularly, with the results of interim surveys being reported to the Regulatory Committee. Following a procurement exercise, CH2M was commissioned in January 2017 to undertake a comprehensive survey of demand for taxis and undertook the research between March 2017 and June 2017.

At its meeting on 21 August 2017, the Regulatory Committee directed officer to publish the CH2M report on the Consultation Hub, and to invite comment from interested parties on (i) the survey and its conclusions; and (ii) views on whether the Council should maintain the taxi limitation policy; and to report results back to the Committee.

Consultation Conclusion: Survey of Demand for Taxis within the City of Edinburgh

1. Recommendations

The Regulatory Committee is asked to:

- 1.1 note the attached report from CH2M (appendix 2) and note CH2M's conclusion that no significant unmet demand exists;
- 1.2 note the feedback received after the report was published on the Consultation Hub (appendices 2 and 3); and
- 1.3 agree to maintain the limitation policy and therefore determine that the limit of 1316 licences should remain.

2. Background

- 2.1 The Council acts as a Licensing Authority for the purpose of licensing taxis within the City of Edinburgh. In line with the powers contained in the Civic Government (Scotland) Act 1982, the Council has adopted a policy of limiting the number of taxi licences issued where there is no evidence of significant unmet demand. The Council last formally reviewed this position in 2013. At present there are 1316 licences for taxis within the city. All applications for taxi licences are currently referred to the Licensing Sub-Committee for a hearing and decision.
- 2.2 The policy of restricting the number of taxi licences within the city attracts considerable debate. One view, generally held by taxi licence holders, is strongly in favour of retaining the restriction on licence numbers, on the grounds that overprovision would harm the viability of the trade. There are other groups which strongly argue that the policy is a restraint on trade, and seek the removal of the restriction. Typically these will include people who do not currently have a taxi licence, but wish to obtain one, or licensed taxi drivers who wish to operate their own taxi as opposed to driving shifts in taxis licensed by others.
- 2.3 The restriction policy has been challenged. This typically takes the form of appeal to the Sheriff against decisions of the Licensing Sub-Committee to refuse applications for taxi licences based on the committee's assessment that there is

no significant unmet demand. The Committee is asked to note that in late 2016 the Sheriff Court refused an appeal from a licence holder who had been refused a licence based on the absence of unmet demand. A further appeal remains outstanding.

- 2.4 The Scottish Government has issued guidance for licensing authorities which operate a limitation policy. The guidance clearly indicates that the level of unmet demand must be kept under regular review. The guidance also makes clear that authorities should consider any evidence of 'peak demand' and consider the impact of this when considering if there is 'significant unmet demand'. Examples of 'peak demand' may be after pubs and clubs close at weekends. The guidance also makes clear that peak demand should not be considered in isolation, but balanced against the full range of data.
- 2.5 The CH2M report (appendix 1) was published on the Consultation Hub between 5 September and 1 October 2017. There were 87 responses and a summary of these is attached at appendix 2. Demographics questions were included (questions 7 – 12) and these results can be provided if required. Other information provided in response to the consultation is attached at Appendix 3.

3. Main report

- 3.1 The CH2M research provides the Committee with an up to date review of the level of demand for taxis in the City. This will form the basis on which individual licences will be considered until the next formal review, which will be in approximately three years' time. In addition Committee has already approved the procurement of interim demand research at a frequency of six months. This will ensure that the service is operating in line with best practice, and will provide a robust basis for decisions should any legal challenge be made.
- 3.2 The CH2M report concludes that the number of hours where excess passenger demand was observed has increased since the last study, as has passenger delay.
- 3.3 There is no evidence of significant unmet demand for taxis in Edinburgh. This conclusion is based on an assessment of the implications of case law that have emerged since 2000, and the results of CH2M's analysis.
- 3.4 On this basis, the authority has discretion in its taxi licensing policy, and may either:
 - 3.4.1 continue to limit the number of vehicles at 1,316;
 - 3.4.2 issue any number of additional plates as it sees fit, either in one allocation or a series of allocations; or

- 3.4.3 remove the limit on the number of vehicles and allow a free entry policy.
- 3.5 Overall the public were generally satisfied with the taxi service in Edinburgh. Levels of passenger satisfaction with waiting time were high. The key results from the 'public attitude' survey highlight:
 - 3.5.1 Almost a quarter of taxi hires are from a stance;
 - 3.5.2 High levels of satisfaction with delay on most recent trip. Hiring by 'app' provided the highest satisfaction levels
 - 3.5.3 Just under 11% of people surveyed had given up trying to obtain a taxi at a stance or by flagdown and
 - 3.5.4 Just over a third of respondents felt that taxi services could be improved – more taxis provided at peak times and better customer service.
- 3.6 Overall, wheelchair users and other people with disabilities/special needs were satisfied with the current service and range of vehicles licensed. Comment was made as to the need to improve access at Waverley Station.
- 3.7 Taxi trade representatives raised the following issues during the survey. The Committee should consider these as part of its overall review of this policy:
 - 3.7.1 Private hire car numbers had doubled in Edinburgh in the last year. Concerns were raised that the market in Edinburgh cannot sustain increased vehicle numbers on this scale;
 - 3.7.2 job numbers were down, it was difficult to fill night driver shifts and taxis were for sale and attracting no buyers in the current market;
 - 3.7.3 while there is now legislation in place to limit private hire car numbers, they understand that the Council would be reluctant to implement this without further guidance;
 - 3.7.4 licensing fees have increased overall;
 - 3.7.5 private hire cars on various fleets transferring to Uber on Friday and Saturday evenings to benefit from surge pricing; and
 - 3.7.6 illegal operating - proper enforcement needed to prevent illegal private hire cars applying;
- 3.8 With respect to Scottish Government guidance, the Council has had the taxi limitation policy since 1990 and it has been reviewed periodically since then. The recommended assessment of demand and public attitude is provided by the CH2M report. The fieldwork for the most recent interim survey on demand for taxis was carried out in April and May 2017.

- 3.9 As recommended by the Committee at its meeting in [August 2017](#), a short period of consultation was agreed, to allow the taxi trade and other interested parties to comment on the report and its recommendations.
- 3.10 There were 87 responses in total. 71% of respondents were connected with the taxi trade and 29% of respondents were members of the public.
- 3.11 93% of respondents either agreed or strongly agreed that the Council should maintain the taxi limitation policy. 5% disagreed or strongly disagreed.
- 3.12 Respondents were asked for comments and these are attached at appendix 3.
- 3.13 Given (a) a drop in demand; (b) concern about private hire car numbers; and (c) strong support for the limitation policy, it is recommended that members should reaffirm the limitation policy, and accept and implement the CH2M conclusions and recommendations..

4. Measures of success

- 4.1 That the City has sufficient taxis to meet the customer demand placed upon the fleet.

5. Financial impact

- 5.1 The cost of the CH2M research is contained within the income from the taxi licence fees.

6. Risk, policy, compliance and governance impact

- 6.1 The Council's scale of fees for licensing applications was approved with effect from 1 April 2017.
- 6.2 The cost of the survey was contained within the Civic Government (Scotland) Act 1982 licensing budget and was previously reported to the Finance and Resources Committee.

7. Equalities impact

- 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 the report do not deliver any outcomes relating to the ten areas of rights, nor do they enhance or infringe them.

8. Sustainability impact

- 8.1 Any increase in the taxi fleet by increasing the number of licences issued would have an impact on the Environment within the City, potentially including levels of pollution.

9. Consultation and engagement

- 9.1 The tender issued by the Council for the consultants required that the research included specific and extensive consultations with interest groups. Full details are contained in the CH2M report at appendix 1, but these groups included:
- 9.1.1 Representatives of the taxi trade;
 - 9.1.2 The public;
 - 9.1.3 Police Scotland, in particular the Cab Inspector and officers with responsibility for the City Centre;
 - 9.1.4 Council Officers with responsibility for Community Safety, Transport and Economic Development; and
 - 9.1.5 Disability Groups
- 9.2 The CH2M report was posted on the Consultation Hub between 5 September and 1 October 2017.

10. Background reading/external references

- 10.1 [Full survey of taxi demand – Regulatory Committee 21 August 2017](#)
- 10.2 [Interim survey of taxi demand – Regulatory Committee 21 August 2017](#)

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11. Appendices

Appendix 1 - CH2M report dated 31 July 2017

Appendix 2 - Summary report from Consultation Hub

Appendix 3 - Further information via Consultation Hub

Appendix 1

FINAL REPORT

Edinburgh Taxi Unmet Demand Survey

Prepared for

City of Edinburgh
Council

July 2017



CH2M Hill
Park House
Headingley Office Park
Victoria Road
Leeds



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Document History

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This document has been issued and amended as follows:

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2	14.07.2017	Final Report	Katie Dixon	Liz Richardson	Liz Richardson
2.1	31.07.2017	Final Report	Katie Dixon	Liz Richardson	Liz Richardson

Section 0 – Report

In preparing this report, CH2M relied, in whole or in part, on data and information provided by the Client and third parties, which information has not been independently verified by CH2M and which CH2M has assumed to be accurate, complete, reliable, and current. Therefore, while CH2M has utilised reasonable skill and care in preparing this Report, CH2M does not warrant or guarantee the conclusions set forth in this Report which are dependent or based upon data, information, or statements supplied by third parties or the client.

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Introduction

1.1 General

This study has been conducted by CH2M on behalf of City of Edinburgh Council (CEC). The overall objective is to provide a full survey of demand for taxis in Edinburgh and to determine whether significant unmet demand for taxis exists in terms of section 10(3) of the Civic Government (Scotland) Act 1982. Specific objectives of the study are to determine:

- Whether there is any significant unmet demand for taxi services in Edinburgh;
- If significant unmet demand is found, recommend how many licences would be required to meet this;
- To determine public perception of the taxi service provided in Edinburgh;
- To determine perception of the taxi service provided in Edinburgh amongst wheelchair users and other people with disabilities/special needs;
- To comment on any areas within Edinburgh city where there may be concern over the provision of a taxi service; and
- To comment on any peak demand times where there may be concern over the provision of a taxi service in Edinburgh city.

In 2007 the Scottish Government issued Best Practice Guidance for Taxi and Private Hire licensing. The Scottish Government reissued this guidance in April 2012 in recognition of a number of legislative changes. Essentially, the Government stated that the present legal position on quantity restrictions for taxis is set out in section 10(3) of the 1982 Act. The Scottish Government takes the view that decisions as to the case for limiting taxi licences should remain a matter for licensing authorities in the light of local circumstances. The Guidance provides local authorities with assistance in local decision making when they are determining the licensing policies for their local area. Guidance is provided on a range of issues including: flexible taxi services, vehicle licensing, driver licensing and training.

The Equality Act 2010 provides a cross-cutting legislative framework to protect the rights of individuals and advance equality of opportunity for all; to update, simplify and strengthen the previous legislation; and to deliver a simple, modern and accessible framework of discrimination law which protects individuals from unfair treatment and promotes a fair and more equal society. The provisions in the Equality Act have come into force at different times to allow time for the people and organisations affected by the new laws to prepare for them.

Sections 165, 166 and 167 of the Equality Act 2010 are concerned with the provision of wheelchair accessible vehicles and place obligations on drivers of registered vehicles to carry out certain duties unless granted an exemption by the licensing authority on the grounds of medical or physical condition. From 6 April 2017 drivers of taxis and private hire cars (PHCs) designated by the local licensing authority as being wheelchair accessible must

comply with the requirements of Section 165 of the Equality Act 2010, unless they have been issued with an exemption certificate. Section 165 means taxi and private hire car drivers are obliged by law to:

- Transport wheelchair users in their wheelchair
- Provide passengers in wheelchairs with appropriate assistance
- Charge wheelchair users the same as non wheelchair users.

Section 166 allows taxi drivers to apply to their licensing authority for an exemption from Section 165 of the Equality Act 2010.

These rules will affect all vehicles that are designated as wheelchair accessible and will affect both taxis and private hire cars.

Background

2.1 General

This section of the report provides a general background to the taxi market in Edinburgh and the relevant legislation governing the market.

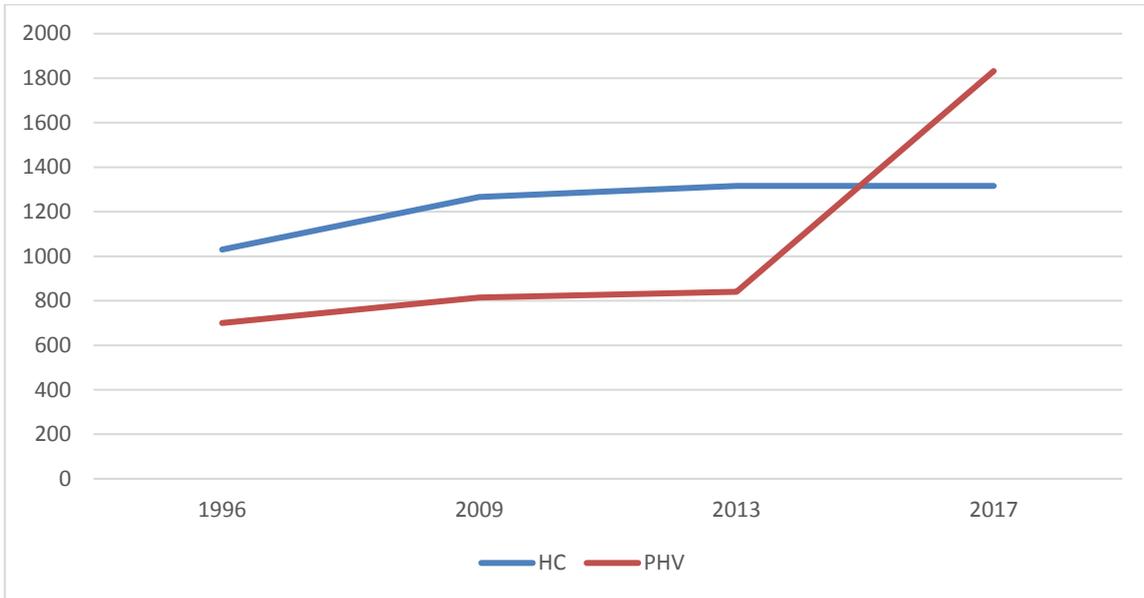
2.2 Background

Edinburgh is the capital city of Scotland and covers some 259 square kilometres. Edinburgh's resident population is 476,600 (Office for National Statistics, 2013). The city has a large student and visitor population and demand for taxis fluctuates across the year.

In recent times, following a period of deregulation, a limit of 1,030 taxi licences was introduced in 1990. This was reviewed in 1993 and 1995 and the limit was raised by 181. In 2001, the limit was increased by a further 49, to 1,260. Following a survey in 2005, the Council concluded that there was no evidence of significant demand for taxis which was unmet and resolved not to issue any new licences at that time. In February 2007, the Council considered an update to the 2005 survey, involving stance surveys and questionnaires to stakeholders, and again concluded that there was no significant demand for taxi services which was unmet. On 25th October 2007, the Council reaffirmed its existing policy to restrict the number of taxi licences issued to 1,260 and instructed the Director of Corporate Services to commission a comprehensive report on taxi demand approximately every three years. An unmet demand study was commissioned in 2008. The report identified that there was evidence of significant unmet demand for taxi services and a recommendation was made for 30 new taxi licences be issued to meet this demand. In addition to these 30 licences a further 20 more taxi licences were issued on appeal. The unmet demand study in 2013 stated that there was no unmet demand and therefore no extra licences were awarded.

City of Edinburgh Council currently licences 1,316 taxis. This provides Edinburgh with a taxi provision of around one taxi per 362 resident population. The Edinburgh taxi fleet consists of approximately two thirds TX's with the remaining third comprised of Vitos and E7s. City of Edinburgh Council also licence approximately 1,800 private hire cars. Vehicle numbers have continued to increase since 1996 as demonstrated in Figure 2.1 The Figure shows a significant increase since the last study in 2013 and that there are now more private hire cars than taxis.

Figure 2.1 Taxi and PHV trends



2.3 Provision of Taxi Stands

There are currently 82 official taxi stances¹ located throughout the Edinburgh licensing area; the locations and times of operation of each of the stances are provided in Appendix 1. Market Street (temporary stance), Haymarket and Waverley Bridge stances are pictured below.

¹ Market Street is a temporary stance

Section 2 – Background



Market Street (Note this is currently a temporary stance while a permanent stance location is sought).



Haymarket



Waverley Bridge

2.4 Taxi Fares and Licence Premiums

Taxi fares are regulated by the Local Authority. There are four tariffs across the following periods;

- Tariff 1– Monday to Friday, 6am until 6pm;
- Tariff 2 – Monday to Friday, 6pm until 6am, Saturday 6am to Monday 6am
- Tariff 3 – Monday to Friday, 6am until 6pm during Christmas and New Year;
- Tariff 4 – Monday to Friday, 6pm until 6am, Saturday 6am to Monday 6am during Christmas and New Year.

The standard charge tariff is made up of two elements: an initial fee (or 'drop') of £2.10 for entering the vehicle, and a fixed price addition of 25p per 184m/213m dependent on the tariff in place, or uncompleted part thereof travelled, plus fixed additions for waiting time. Fixed additional charges are also in place for extra passengers or luggage. A standard two-mile daytime fare undertaken by one individual would therefore be £5.60. The tariffs are outlined in detail in the fare card in Figure 2.2 below.

Figure 2.2 – Farecard for Edinburgh

**THE CITY OF EDINBURGH COUNCIL
CIVIC GOVERNMENT (SCOTLAND) ACT 1982
FARE TABLE FOR TAXIS
With effect from 13 November 2016**

FOR UP TO 2 PASSENGERS

TARIFF 1 Monday - Friday 6am – 6pm	TARIFF 2 Monday - Friday 6pm – 6am the following day 6am Saturday – 6am Monday
TARIFF 3 Monday - Friday 6am – 6pm during Christmas and New Year	TARIFF 4 Monday - Friday 6pm – 6am the following day 6am on Saturday – 6am Monday during Christmas and New Year
CHRISTMAS NEW YEAR	6pm on 24 December to 6am on 27 December 6pm on 31 December to midnight on 2 January

CHARGES	TARIFF 1	TARIFF 2	TARIFF 3	TARIFF 4
<ul style="list-style-type: none"> ▪ Initial hire not exceeding 516m ▪ Initial 105 seconds of waiting time ▪ Combination of initial time and distance 	£2.10	£3.10	£3.10	£4.10
<ul style="list-style-type: none"> ▪ Each additional 184m up until 1968m and thereafter each additional 213m ▪ Each additional 39 seconds of waiting time ▪ Combination of additional time and distance 	£0.25	£0.25	£0.35	£0.45

EXTRA PAYMENTS

When more than 2 passengers	Each	£0.20
Note: Only 2 children under 12 years will be reckoned as one passenger. No extra fare will be charged for one child under 5 years of age.		
Each Passenger must be properly seated		
Hires ending at Edinburgh Airport Inner Drop-off Zone (See Note 4 below)	£1.00	
Call Out Charge	£0.80	Airport Pickup
Applicable when pre-booked		For hires commencing at Edinburgh airport
Cancellation Fee	£2.20	Payment Of Fare By Credit/Debit Card
Applicable when taxi is pre-booked but not used		Extra applicable when fare paid by the above means
Cleaning Fee Applicable when taxi is soiled (by travel sickness)	£50.00	5.0 %

The publication Private Hire and Taxi Monthly issues monthly league tables of the fares for 365 authorities over a two-mile day time journey. Each journey is ranked with one being the most expensive. The June 2017 table shows Edinburgh rated 197th in the table, indicating that Edinburgh has lower than average fares. Table 2.1 provides a comparison of where a selection of other authorities in Scotland, based on population figures and the presence of a large city or town, rank in terms of fares, showing that fares in Edinburgh are mid-range in comparison to other similar authorities.

Section 2 – Background

Table 2.1 - Comparison of neighbouring authorities in terms of fares (Source Private Hire and Taxi Monthly, June 2017)

Local Authority	Rank
East Lothian	19
Midlothian	83
Fife	128
City of Edinburgh	197
West Lothian	214
Falkirk	346

Benchmarking

3.1 Introduction

A benchmarking exercise has been undertaken to compare taxi provision in Edinburgh with that of the Scottish cities and the English core cities. This exercise presents information for the remaining six cities in Scotland, and the eight core cities in England. The core cities comprise those cities that are considered the economically most important cities outside of London in England. Table 3.1 shows the cities used in this benchmarking exercise. The benchmarking exercise has been undertaken using data sourced from the latest edition of the Scottish Transport Statistics, (No 35: 2016 Edition)² and the Department for Transport's Taxi statistics³ therefore the numbers reported here may differ from current licensed numbers if there has been significant change in a particular area since the figures were published.

Table 3.1 – Cities used in benchmarking exercise

Scottish Cities	Core Cities
Aberdeen	Birmingham
Dundee	Bristol
Edinburgh	Leeds
Glasgow	Liverpool
Inverness	Manchester
Perth	Newcastle
Stirling	Nottingham
	Sheffield

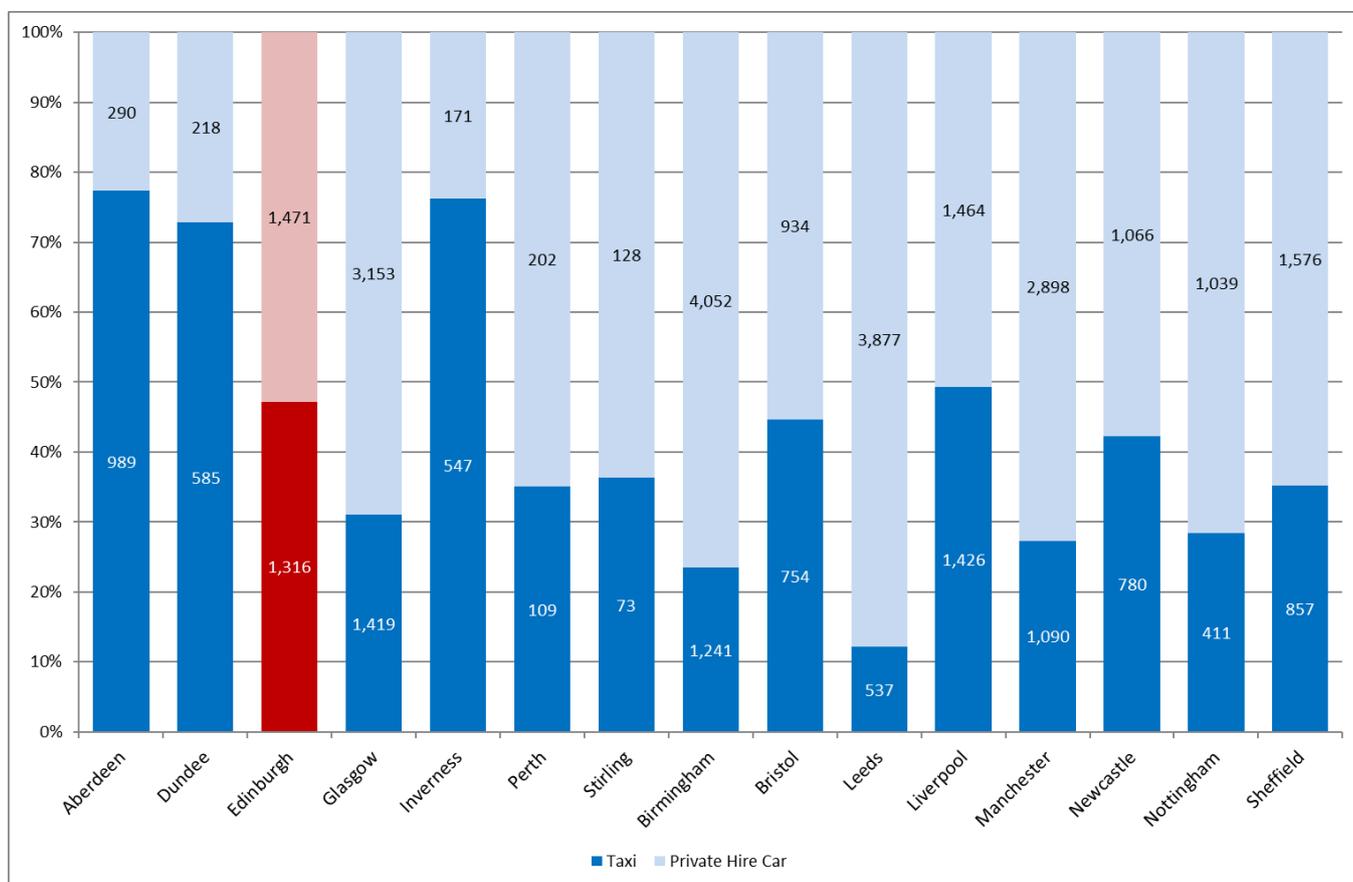
² <https://www.transport.gov.scot/publication/scottish-transport-statistics-no-35-2016-edition/>

³ <https://www.gov.uk/government/collections/taxi-statistics>

3.1 Fleet Composition

Figure 3.1 documents the fleet size for Edinburgh along with the other benchmarked authorities⁴. Liverpool, Glasgow and Edinburgh have the largest fleets of taxis (1,426, 1,419 and 1,316 vehicles respectively), while Birmingham has the largest combined (taxi and private hire car) fleet at 5,293 vehicles. Of the other Scottish cities, Glasgow has the largest combined fleet at 4,251 vehicles. Stirling has the smallest taxi fleet (73 vehicles) whilst Stirling and Inverness have the smallest private hire fleets at 128 and 171 vehicles.

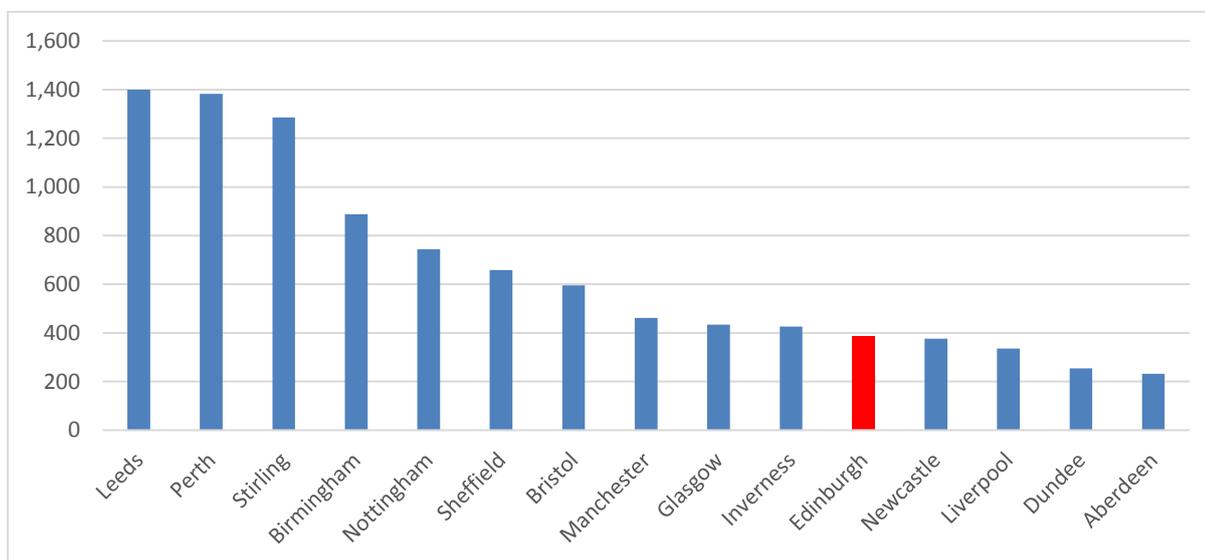
Figure 3.1 Fleet Composition



⁴ Note the figures on fleet composition are the latest published figures therefore may differ to licensed vehicle numbers as of July 2017.

Edinburgh has the third largest taxi fleet and the fifth smallest private hire fleet, placing it in mid-range of the comparable authorities in terms of its overall fleet size. While these figures are based on the latest published figures available, we note that private hire car numbers in Edinburgh have recently increased to approximately 1,800 in July 2017 which has increased the overall fleet size. Figure 3.2 shows taxi per capita provision in each authority. This demonstrates that Aberdeen has the lowest number of people per taxi, thereby indicating that it has the best provision of the authorities shown. Leeds has the highest number of people per taxi, and therefore the worst provision. Edinburgh has the fifth best taxi provision per capita.

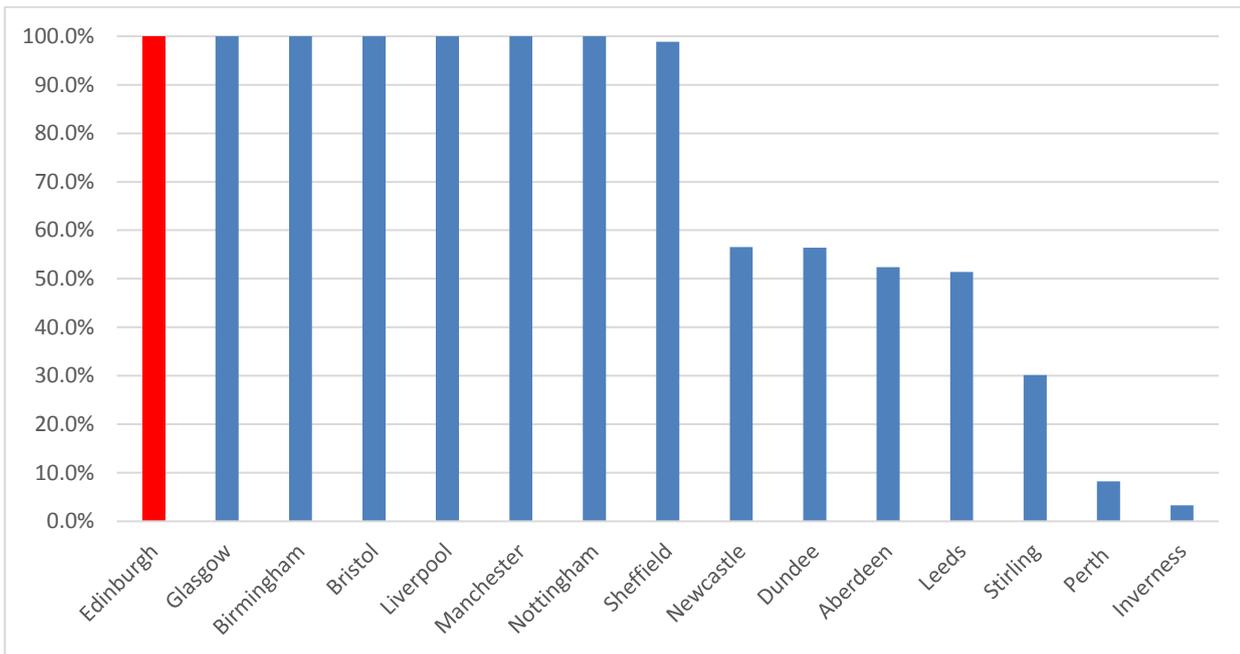
Figure 3.2 Population per taxi across the different licensing authorities



3.2 Wheelchair Accessible Vehicles

With regards to wheelchair accessible vehicles, Edinburgh ranked in joint first position. This is due to all taxis being wheelchair accessible, a move which six other cities have also taken. The remaining eight locations (excluding Sheffield with 98.8% taxi wheelchair accessibility), have around 50% or less of their taxis able to accommodate wheelchairs. Figure 3.4 shows the percentage of taxis in each authority which are wheelchair accessible:

Figure 3.4 Proportion of the taxi fleet that is wheelchair accessible



3.3 Entry Control

Table 3.1 documents the entry control policies for the 15 authorities. Edinburgh is one of the fourteen authorities which impose a numerical limit on the number of taxis licensed.

Table 3.1 Entry Control Policy for the Authorities

Authority	Entry Control Policy
Aberdeen	Restricted
Birmingham	Restricted
Bristol	Restricted
Dundee	Restricted
Edinburgh	Restricted
Glasgow	Restricted
Inverness	Derestricted
Leeds	Restricted
Liverpool	Restricted

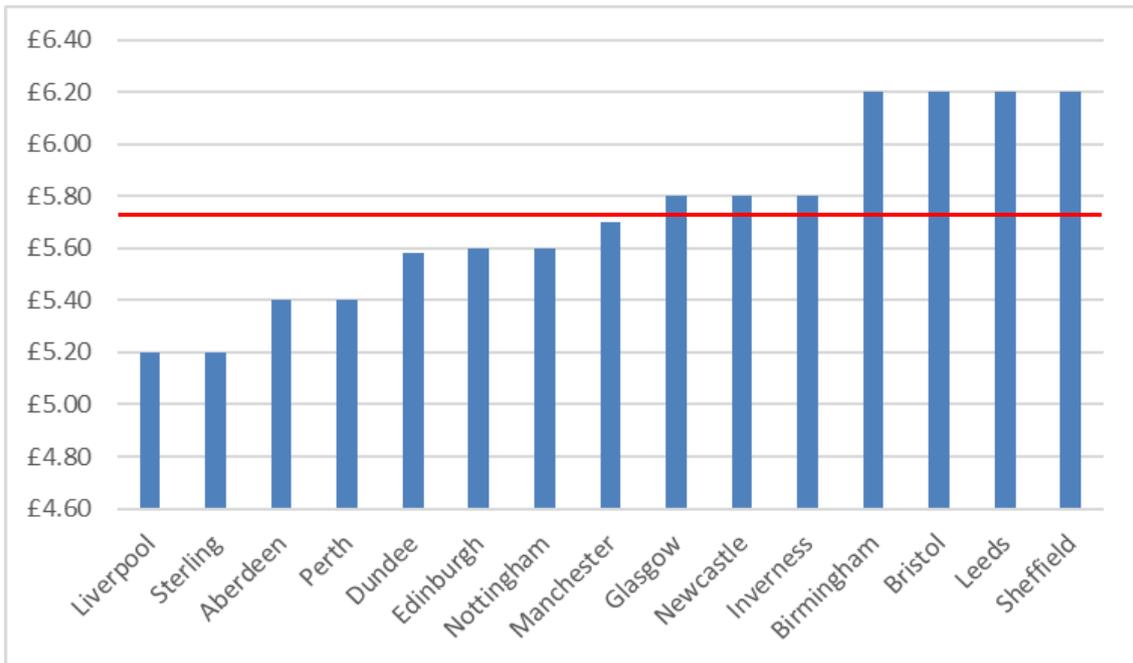
Manchester	Restricted
Newcastle	Restricted
Nottingham	Restricted
Perth	Restricted
Sheffield	Restricted
Stirling	Restricted

3.4 Fares

Figure 3.5 details the average fare for a two-mile journey across the core cities and Scottish cities. The average cost of a two-mile journey in Edinburgh is £5.60, thereby showing that fares in Edinburgh are marginally cheaper than the average which is £5.72. Of the authorities included in this benchmarking exercise, fares are most expensive at £6.20 in Birmingham, Leeds, Bristol and Sheffield, while the lowest fares are found at £5.20 in Stirling and Liverpool.

Figure 3.5 Fare for a two-mile journey

Section 3 – Benchmarking



Source: Derived from Private Hire and Taxi Monthly, June 2017

Definition, Measurement and Removal of Significant Unmet Demand

4.1 Introduction

Section 4 provides a definition of significant unmet demand derived from experience of over 100 unmet demand studies since 1987. This leads to an objective measure of significant unmet demand that allows clear conclusions regarding the presence or absence of this phenomenon to be drawn. Following this, a description is provided of the SUDSIM model which is a tool developed to determine the number of taxi licences required to eliminate significant unmet demand, where such unmet demand is found to exist. This method has been applied to numerous local authorities and has been tested in the courts as a way of determining if there is unmet demand for taxis.

4.2 Overview

Significant Unmet Demand (SUD) has two components:

- Patent demand – that which is directly observable; and
- ‘Suppressed’ demand – that which is released by additional supply.

Patent demand is measured using stance observation data. Suppressed (or latent) demand is assessed using data from the stance observations and public attitude interview survey. Both are brought together in a single measure of unmet demand, ISUD (Indicator of Significant Unmet Demand).

4.3 Defining Significant Unmet Demand

The provision of evidence to aid licensing authorities in making decisions about taxi provision requires that surveys of demand be carried out. Results based on observations of activity at taxi stances have become the generally accepted minimum requirement.

The definition of significant unmet demand is informed by two Court of Appeal judgements:

- R v Great Yarmouth Borough Council ex p Sawyer (1987); and
- R v Great Castle Point Borough Council ex p Maude (2002).

The Sawyer case provides an indication of the way in which an Authority may interpret the findings of survey work. In the case of Sawyer v Yarmouth City Council, 16 June 1987, Lord Justice Woolf ruled that an Authority is entitled to consider the situation from a temporal point of view as a whole. It does not have to condescend into a detailed consideration as to what may be the position in every limited part of the Authority in relation to the time of day. The authority is required to give effect to the language used by the Section (Section 16) and

can ask itself with regard to the area as a whole whether or not it is satisfied that there is no significant unmet demand.

The term ‘suppressed’ or ‘latent’ demand has caused some confusion over the years. It should be pointed out that following *Maude v Castle Point Borough Council*, heard in the Court of Appeal in October 2002, the term is now interpreted to relate purely to that demand that is measurable. Following *Maude*, there are two components to what Lord Justice Keene prefers to refer to as ‘suppressed demand’:

- What can be determined inappropriately met demand. This is current observable demand that is being met by, for example, private hire cars illegally ranking up; and
- That which arises if people are forced to use some less satisfactory method of travel due to the unavailability of a taxi.

If demand remained at a constant level throughout the day and week, the identification and treatment of significant unmet demand would be more straight-forward. If there were more cabs than required to meet the existing demand there would be queues of cabs on stances throughout the day and night and passenger waiting times would be zero. Conversely, if too few cabs were available there would tend to be queues of passengers throughout the day. In such a case it would, in principle, be a simple matter to estimate the increase in supply of cabs necessary to just eliminate passenger queues.

Demand for taxis varies throughout the day and on different days. The problem, introduced by variable demand, becomes clear when driver earnings are considered. If demand is much higher late at night than it is during the day, an increase in cab supply large enough to eliminate peak delays will have a disproportionate effect on the occupation rate of cabs at all other times. Earnings will fall and fares might have to be increased sharply to sustain the supply of cabs at or near its new level.

The main implication of the present discussion is that it is necessary, when considering whether significant unmet demand exists, to take account of the practicability of improving the standard of service through increasing supply.

4.4 Measuring Patent Significant Unmet Demand

Considering the economic, administrative and legal considerations, the identification of this important aspect of significant unmet demand should be treated as a three stage process as follows:

- Identify the demand profile;
- Estimate the passenger and cab delays; and
- Compare estimated delays to the demand profile.

The broad interpretation to be given to the results of this comparison are summarised in Table 4.1.

Table 4.1 – Existing of SUD determined by comparing demand and delay profiles

Demand is:	Delays during peak only	Delays during peak and other times
Highly peaked	No SUD	Possibly a SUD
Not highly peaked	Possibly a SUD	Possible a SUD

It is clear from the content of the table that the simple descriptive approach fails to provide the necessary degree of clarity to support the decision-making process in cases where the unambiguous conclusion is not achievable. However, it does provide the basis of a robust assessment of the principal component of significant unmet demand. The analysis is therefore extended to provide a more formal numerical measure of significant unmet demand. This is based on the principles contained in the descriptive approach but provides greater clarity. A description follows.

The measure feeds directly off the results of observations of activity at the stances. In particular, it takes account of:

- Case law that suggests an authority should take a broad view of the market;
- The effect of different levels of supply during different periods at the stance on service quality; and
- The need for consistent treatment of different authorities, and the same authority over time.

The Index of Significant Unmet Demand (ISUD) was developed in the early 1990’s and is based on the following formula. The SF element was introduced in 2003 and the LDF element was introduced in 2006 to reflect the increased emphasis on latent demand in DfT Guidance.

$$ISUD = APD \times PF \times GID \times SSP \times SF \times LDF$$

Where:

APD = Average Passenger Delay calculated across the entire week in minutes.

PF = Peaking Factor. If passenger demand is highly peaked at night the factor takes the value of 0.5. If it is not peaked the value is 1. Following case law this provides dispensation for the effects of peaked demand on the ability of the Trade to meet that demand. To identify high peaking we are generally looking for demand at night (at weekends) to be substantially higher than demand at other times.

GID = General Incidence of Delay. This is measured as the proportion of passengers who travel in hours where the delay exceeds one minute.

SSP = Steady State Performance. The corollary of providing dispensation during the peaks in demand is that it is necessary to focus on performance during “normal” hours. This is measured by the proportion of hours during weekday daytimes when the market exhibits excess demand conditions (i.e. passenger queues form at stances).

SF = Seasonality Factor. Due to the nature of these surveys it is not possible to collect information throughout an entire year to assess the effects of seasonality. Experience has suggested that taxi demand does exhibit a degree of seasonality and this is allowed for by the inclusion of a seasonality factor. The factor is set at a level to ensure that a marginal decision either way obtained in an “untypical” month will be reversed. This factor takes a value of 1 for surveys conducted in September to November and March to June, i.e. “typical” months. It takes a value of 1.2 for surveys conducted in January and February and the longer school holidays, where low demand the absence of contract work will bias the results in favour of the taxi trade, and a value of 0.8 for surveys conducted in December during the pre-Christmas rush of activity. Generally, surveys in these atypical months, and in school holidays, should be avoided.

LDF = Latent Demand Factor. This is derived from the public attitude survey results and provides a measure of the proportion of the public who have given up trying to obtain a taxi at either a stance or by flagdown during the previous three months. It is measured as 1+ proportion giving up waiting. The inclusion of this factor is a tactical response to the latest guidance.

The product of these six measures provides an index value. The index is exponential and values above the 80 mark have been found to indicate significant unmet demand. This benchmark was defined by applying the factor to the 25 or so studies that had been conducted at the point it was developed. These earlier studies had used the same principles but in a less structured manner. The highest ISUD value for a study where a conclusion of

no significant unmet demand had been found was 72. The threshold was therefore set at 80. The ISUD factor has been applied to over 80 studies by CH2M and has been adopted by others working in the field. It has proved to be a robust, intuitively appealing and reliable measure.

Suppressed/latent demand is explicitly included in the above analysis by the inclusion of the LDF factor and because any known illegal plying for hire by the private hire trade is included in the stance observation data. This covers both elements of suppressed/latent demand resulting from the Maude case referred to above and is intended to provide a ‘belt and braces’ approach. A consideration of latent demand is also included where there is a need to increase the number of taxi licences following a finding of significant unmet demand. This is discussed in the next section.

4.5 Determining the Number of New Licences Required to Eliminate Significant Unmet Demand

To provide advice on the increase in licences required to eliminate significant unmet demand, CH2M has developed a predictive model. SUDSIM is a product of 20 years’ experience of analysing taxi demand. It is a mathematical model, which predicts the number of additional licences required to eliminate significant unmet demand as a function of key market characteristics.

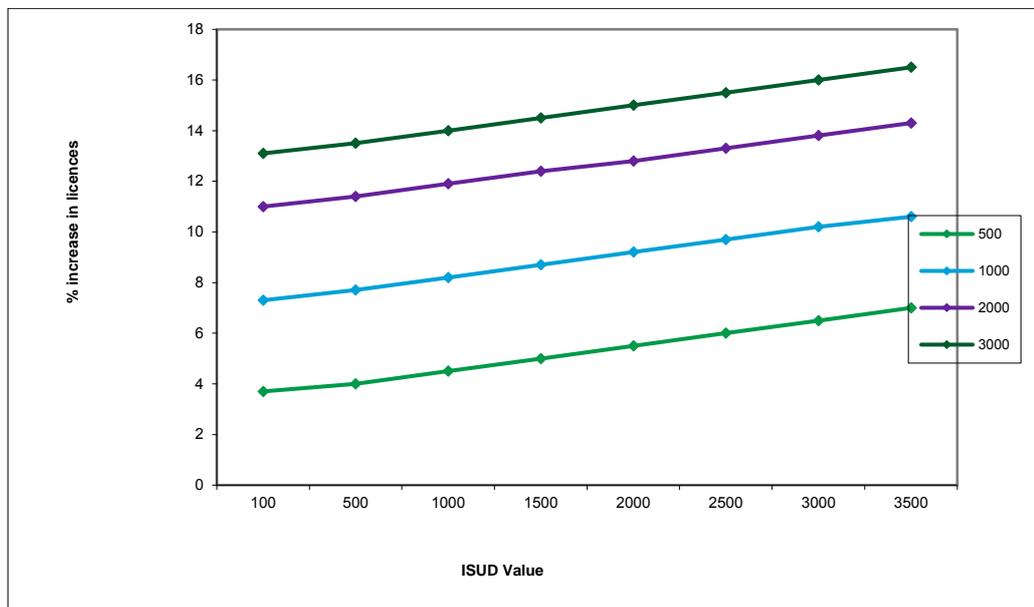
SUDSIM represents a synthesis of a queue simulation work that was previously used (1989 to 2002) to predict the alleviation of significant unmet demand and the ISUD factor described above (hence the term SUDSIM). The benefit of this approach is that it provides a direct relationship between the scale of the ISUD factor and the number of new hackney licences required.

SUDSIM was developed taking the recommendations from 14 previous studies that resulted in an increase in licences, and using these data to calibrate an econometric model. The model provides a relationship between the recommended increase in licences and three key market indicators:

- The population of the licensing authority;
- The number of taxis already licensed by the licensing authority; and
- The size of the SUD factor.

The main implications of the model are illustrated in Figure 4.1 below. The figure shows that the percentage increase in a taxi fleet required to eliminate significant unmet demand is positively related to the population per taxi (PPT) and the value of the ISUD factor over the expected range of these two variables.

Figure 4.1 – Forecast increase in taxi fleet size as a function of population per taxi (PPT) and the ISUD value



Where significant unmet demand is identified, the recommended increase in licences is therefore determined by the following formula:

$$\text{New Licences} = \text{SUDSIM} \times \text{Latent Demand Factor}$$

Where:

Latent Demand Factor = (1 + proportion giving up waiting for a taxi at either a stance or via flagdown).

4.6 Note on Scope of Assessing Significant Unmet Demand

It is useful to note the extent to which a licensing authority is required to consider peripheral matters when establishing the existence or otherwise of significant unmet demand. This issue is informed by *R v Brighton Borough Council, exp p Bunch 1989*⁵. This case set the precedent that it is only those services that are exclusive to taxis that need concern a licensing authority when considering significant unmet demand. Telephone booked trips, trips booked in advance or indeed the provision of bus type services are not exclusive to taxis and have therefore been excluded from consideration.

⁵ See Button JH 'Taxis – Licensing Law and Practice' 2nd edition Tottel 2006 P226-7

Evidence of Patent Unmet Demand – Stance Observation Results

5.1 Introduction

This section of the report highlights the results of the stance observation survey. The stance observation programme covered a period of 511 hours during March to June 2017. Some 53,043 passengers and 34,340 departures were recorded across 17 stances. A summary of the stance observation programme is provided in Appendix 2.

The results presented in this section summarise the information and draw out its implications. This is achieved by using five indicators:

- The Balance of Supply and Demand – this indicates the proportion of the time that the market exhibits excess demand, equilibrium and excess supply;
- Average Delays and Total Demand – this indicates the overall level of passengers and cab delays and provides estimates of total demand;
- The Demand/Delay Profile – this provides the key information required to determine the existence or otherwise of significant unmet demand;
- The Proportions of Passengers Experiencing Given Levels of Delay – this provides a guide to the generality of passenger delay.

5.2 The Balance of Supply and Demand

The results of the analysis are presented in Table 5.1 below. The predominant market state is one of equilibrium. Excess supply (queues of cabs) was experienced during 16% of the hours observed while excess demand (queues of passengers) was experienced 13% of the hours observed. Conditions are generally favourable to customers at all times of the day.

Table 5.2 – The balance of supply and demand in the Edinburgh stance-based taxi market (percentage of hours observed)

Period		Excess Demand (Max Passenger Queue ≥ 3)	Equilibrium	Excess Supply (Min Cab Queue ≥ 3)
Weekday	Day	5	68	26
	Night	9	71	19
Weekend	Day	9	77	13
	Night	30	63	7
Sunday	Day	8	76	15
Total 2017		13	71	16
Total 2013		6	42	52

NB – Excess Demand = Maximum passenger queue ≥ 3 . Excess Supply = Minimum Cab Queue ≥ 3 – values derived over 12 time periods within an hour.

As detailed in Table 5.1 conditions have changed for passengers since the previous study in 2013. The number of hours where excess demand was observed has increased to 13% while the hours the market is in equilibrium has increased from 42% to 71%.

5.3 Average Delays and Total Demand

The following estimates of average delays and throughput were produced for each selected stance in Edinburgh (Table 5.2).

The survey suggests some 53,043 passenger departures occur per week from stances in Edinburgh involving some 34,340 cab departures. The taxi trade is concentrated at the stances at Edinburgh Airport and Market Street accounting for 36% of the total passenger departures. On average cabs wait 9.27 minutes for a passenger. On average passengers wait 1.13 minutes for a cab which is higher than recorded in 2013. The highest level of passenger delay were recorded at Lothian Road (3.45 minutes) and the Omni Centre (2.77 minutes) at night time predominately at the weekend. Passengers encountered little of no delay at the majority of stance locations observed.

The previous study in 2013 was undertaken during the tram works. City of Edinburgh Council also requested additional stances to be observed as part of this study and for the purposes of comparison with the previous study we have totalled them separately.

Since the previous study in 2013 when comparing like for like passenger demand has remained static however passenger delay has increased. Cab departures have also

decreased. When looking at stances on an individual basis passenger demand has increased at the stances at Rutland St, Hannover St and Edinburgh Airport. Passenger demand has decreased at Queensferry St and Wester Hailes.

Table 5.2 Average Delays and Total Demand (Delays in Minutes)

Stance	Passenger Departures	Cab Departures	Average Passenger Delay in Minutes	Average Cab Delay in Minutes
Edinburgh Airport	10,116	6,538	0.53	8.01
Market Street	9,130	5,740	0.71	11.51
Waverley Bridge	4,855	2,716	1.66	9.47
Rutland Street	3,040	1,900	1.38	7.77
High Street	5,572	3,180	0.82	8.08
Hannover Street	1,406	832	0.03	15.97
Queensferry Street	513	594	0.72	7.77
Haymarket*	5,052	3,731	0.13	8.83
Little France (ERI)	671	705	0.00	12.74
Cameron Toll	1,539	1,157	0.13	12.70
Wester Hailes	542	434	0.79	8.96
Omni Centre, Leith Walk	5,029	2,768	2.77	7.52
Lothian Road (Festival Sq)*	4,544	2,823	3.45	7.86
Casselbank Street*	269	281	0.56	12.24
Holyrood Road*	380	374	0.00	5.20
Teviot Place*	94	175	0.00	5.99
Nicholson Square*	290	394	0.00	14.83
Total 2017 – like for like stances	42,414	26,563	1.03	9.45
Total 2017 all stances	53,043	34,340	1.13	9.27

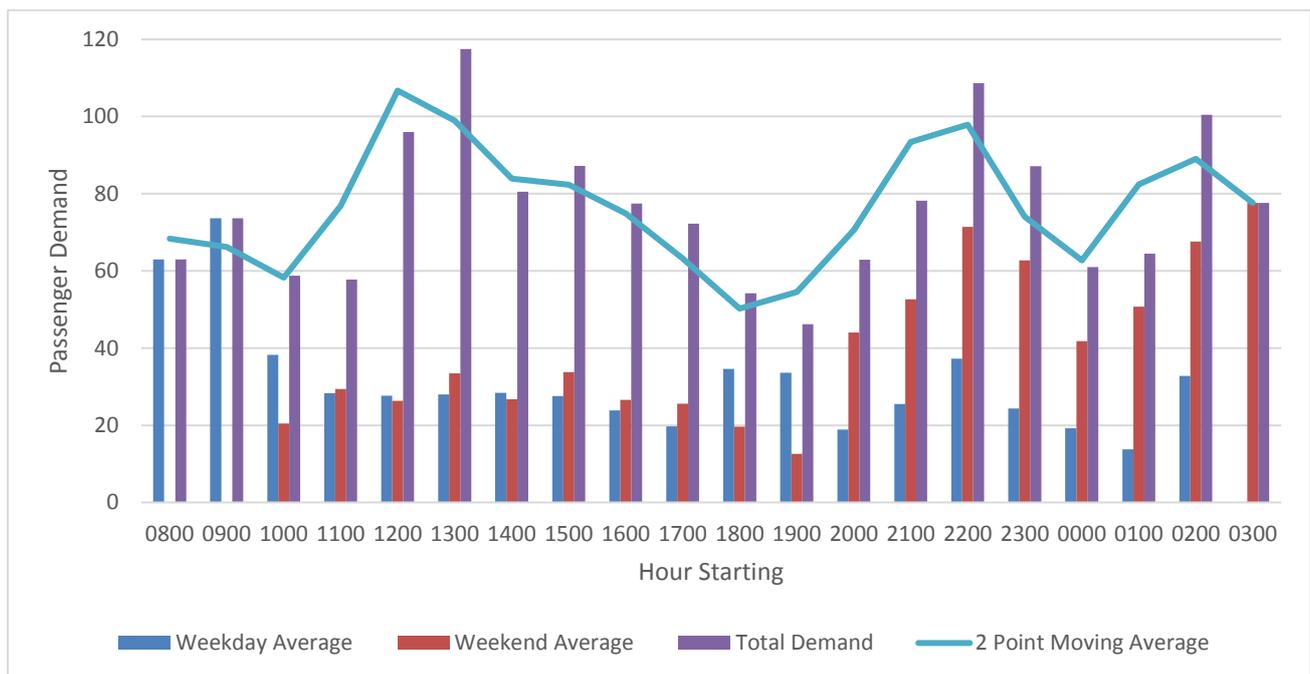
Stance	Passenger Departures	Cab Departures	Average Passenger Delay in Minutes	Average Cab Delay in Minutes
Total 2013	42,228	27,697	0.32	12.07
Total 2008/2009	37,518	23,411	1.27	12.64

*Not observed in 2013

5.4 The Delay/Demand Profile

Figure 5.1 provides a graphical illustration of passenger demand for the Monday to Saturday period between the hours of 08:00 and 04:00.

Figure 5.1 Passenger Demand by Time of Day in 2017 (Monday to Saturday)



The profile of demand shows peaks in demand throughout the day and night.

Figure 5.2 Passenger Delay by Time of Day in 2017(Monday to Saturday)

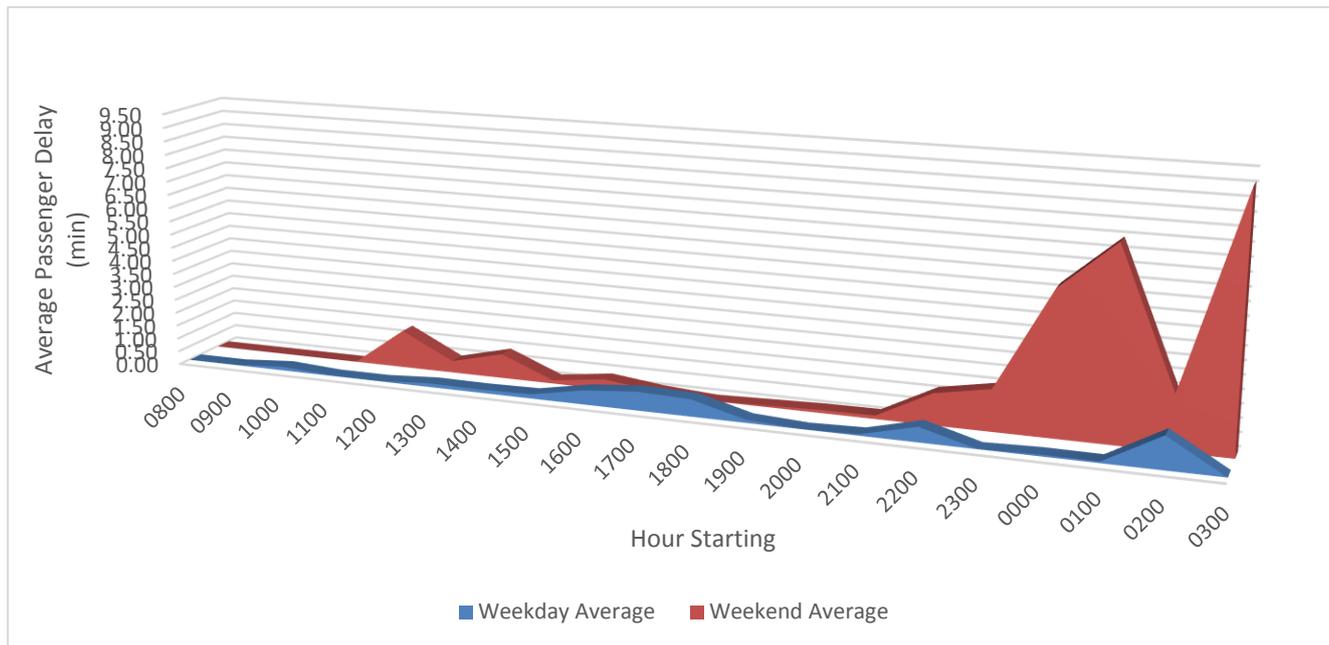


Figure 5.2 provides an illustration of passenger delay by the time of day for the weekday and weekend periods. It shows that delay peaks on weekdays early evening, and late at night at both weekdays and weekends.

5.5 The General Incidence of Passenger Delay

The stance observations data can be used to provide a simple assessment of the likelihood of passengers encountering delay at stances. The results are presented in Table 5.3 below.

Table 5.3 – General incidence of passenger delay (percentage of passengers travelling in hours where delay exceeds one minute)

Year	Delay > 0	Delay > 1 min	Delay > 5 min
2017	13.11	7.31	3.09
2013	5.66	2.73	0.17
2008/2009	12.27	7.35	2.60

In 2017, 7.31% of passengers are likely to experience more than a minute of delay. It is this proportion (7.31%) that is used within the ISUD as the ‘Generality of Passenger Delay’.

5.6 The Effective Supply of Vehicles

Observers were required to record the taxi licence plate number of vehicles departing from stances⁶. In this way we are able to ascertain the proportion of the fleet that was operating during the survey. During the daytime period (0700 to 1800) some 1026 (78%) of the taxi fleet were observed at least once during the period of the study. During the evening/night-time period (1800 to 0700) some 962 (73.1%) of the taxi fleet were also observed at least once during the stance observations. In total 92.2% of the trade was observed at least once.

⁶ This does not include the airport as we observed activity by video camera

Evidence of Suppressed Demand – Public Attitude Pedestrian Survey Results

6.1 Introduction

A public attitude survey was designed with the aim of collecting information regarding opinions on the taxi market in Edinburgh. The survey allowed an assessment of flagdown, telephone and stance delays, the satisfaction with delays and general use information.

Public attitude surveys were carried out in May and June 2017 through an online survey hosted on City of Edinburgh Council's Consultation Hub, as well as face to face surveys on street in Edinburgh and via telephone. The face to face surveys were conducted across a range of locations within the Edinburgh licensing area. Some 573 responses were received online with a further 382 undertaken face to face providing a total of 955 surveys.

Following our verification procedures some 107 responses were discounted from the results for a variety of reasons. It was clear a number of the online surveys had been completed by taxi trade members rather than genuine members of the public while other surveys were incomplete or incorrectly filled in. This provided a total of 848 surveys taken forward for analysis.

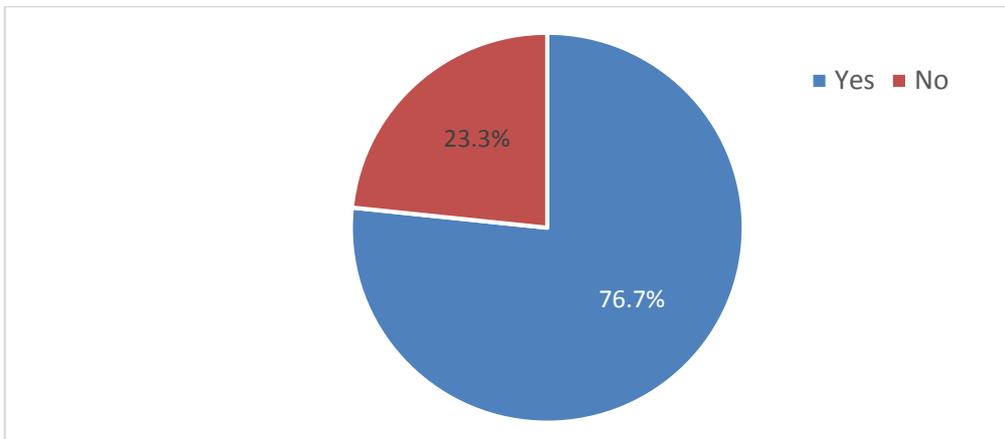
It should be noted that in the tables and figures that follow the totals do not always add up to the same amount which is due to one of two reasons. First, not all respondents were required to answer all questions; and second, some respondents failed to answer some questions that were asked.

6.2 General Information

Some 61% of respondents identified themselves as male and 39% female. Thirteen percent of respondents were over 65 years old, 27% were under 34 years old, with 60% of respondents 35 – 64 years old. Of the responses received 79% were from residents with 18% from visitors and 3% from students.

Respondents were asked whether they had made a trip by taxi or private hire car in the past three months. Figure 6.1 shows that 76.7% (650) of the 848 people surveyed had made a trip by taxi or private hire car in the last three months.

Figure 6.1 – Have you made a trip by taxi or private hire car in the last three months?



Those respondents who had made a trip by taxi or private hire car were asked how they obtained their vehicle. Some 24.7% of trip makers (160) stated that they hired their taxi at a stance while 19.6% (127) of taxi hirings were obtained by on-street flagdown. The results for stance hire are similar to the previous survey undertaken in 2013 (27.1%) but the on street flagdown has reduced from 35.6% to 19.6%. Some 35.5% (230) of trips were achieved by telephone and 20.1% (130) online via an app. The online and telephone bookings relate to both taxi and private hire car bookings. Figure 6.2 reveals the pattern of hire.

Those who obtained their vehicle using an app were asked which app they used. Respondents used a variety of apps including Uber, Capital, Central, City Cabs, ECPH and Gett. The method of hire varied by age group with 32% of those under 34 obtaining their vehicle by an online app compared to just 6% of those aged 65 or over. Table 6.1 shows the method of hire by age group.

Figure 6.2 – Method of hire for last trip

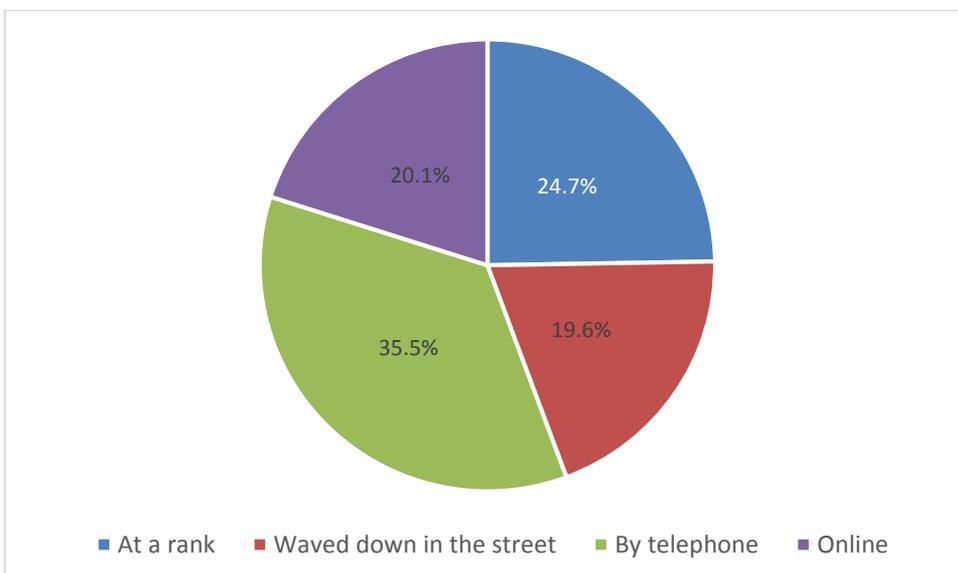


Table 6.1 Method of hire by age group

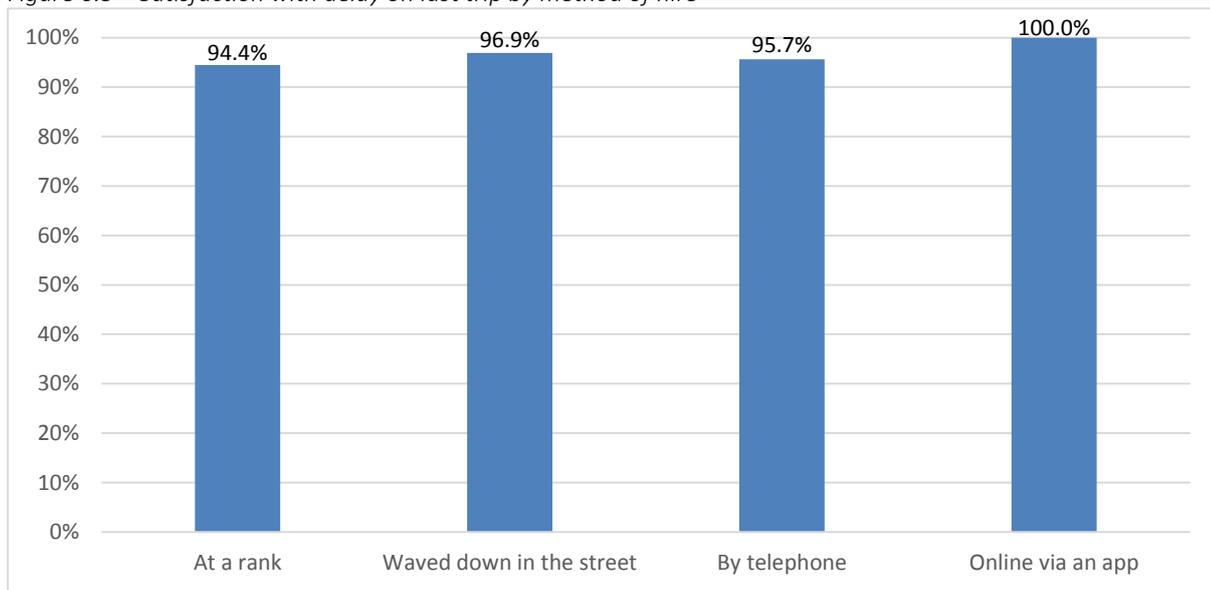
Method of hire	16-34 years	35 - 64 years	65+ years	Overall
Rank	16.0%	30.3%	11.3%	24.7%
Flag	16.7%	20.3%	16.1%	19.6%
Phone	35.3%	31.3%	66.1%	35.5%
Online	32.0%	18.2%	6.5%	20.1%

Respondents were asked what time of day and day of the week they obtained their taxi or private hire car. Some 54% of trips were taken on a Friday or Saturday. Overall 36% of trips were in the daytime before 6pm, 34% were in the evening between 6pm-8pm, and 30% were at night after 10pm. When considering only online or app bookings some 47% were in the evening with 19% at night and the remaining 34% in the daytime.

Respondents were asked what type of vehicle they had obtained on their last trip. Some 66.6% (431) were wheelchair accessible vehicles and 29.2% (189) were saloon vehicles (ie private hire cars). They were then asked if they were satisfied with the time taken and the promptness of the vehicles arrival. When considering all hirings, most customers (96.3%) were satisfied with their last taxi or private hire car journey.

Figure 6.3 shows that for each method of obtaining a vehicle, the majority were satisfied with the length of time they had to wait. Those obtaining their taxi or private hire car via an online app provided the highest levels of satisfaction. In the 2013 report, satisfaction was greatest for hires by prebooking by telephone (96%).

Figure 6.3 – Satisfaction with delay on last trip by method of hire

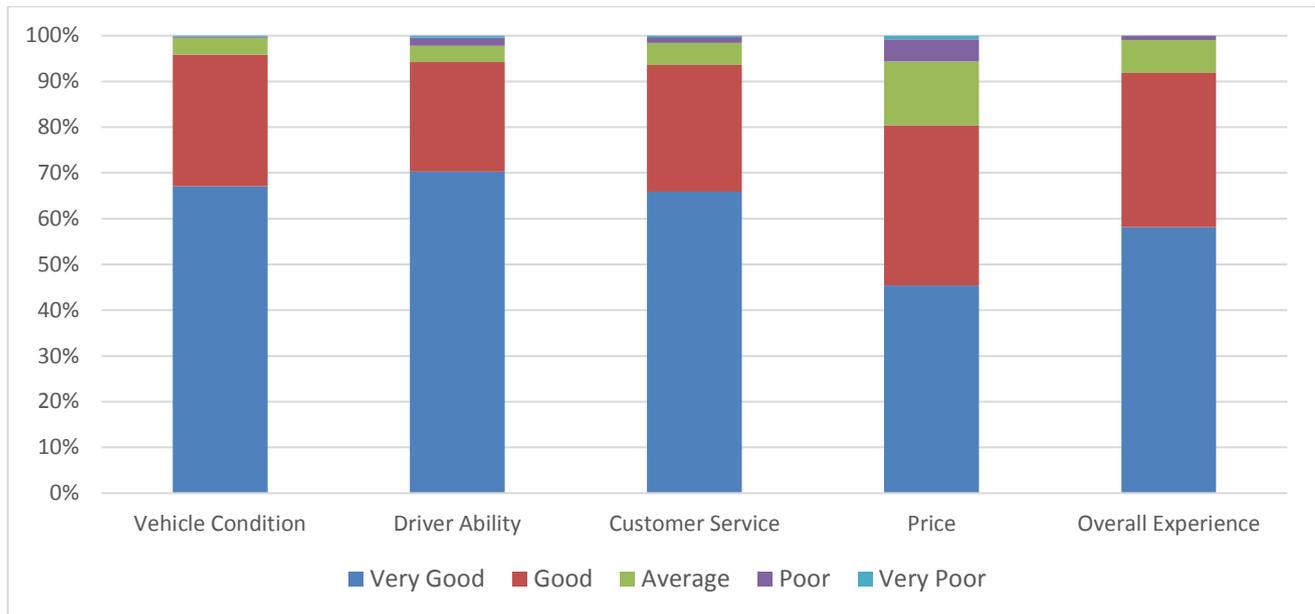


Respondents were also asked if they had received any discount on their last trip, with 10.3% (66) of trip makers stating that they had.

Trip makers were asked to rate five elements from their last taxi journey on a scale from very poor to very good. The results in Figure 6.4 show that all elements were generally good. When poor ratings were given, respondents were asked to provide a reason for their rating. Negative ratings included reasons such as:

- Fares considered to be too expensive (40% of responses)
- Lack of driver knowledge, including reliance on Sat Nav and poor route choice (38% of responses)
- Driver behaviour, including poor driving (10% of responses)
- Driver language difficulties (5% of responses)
- Vehicle cleanliness (3% of responses)
- Excessive traffic in Edinburgh (3% of responses)

Figure 6.4 – Rating of last journey



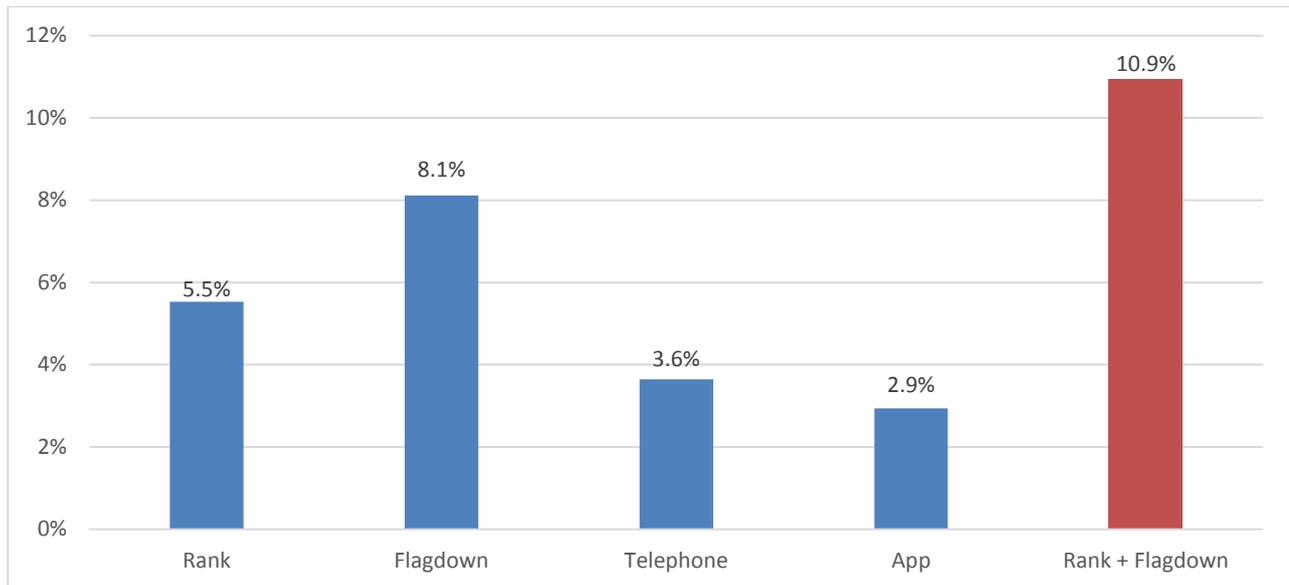
Respondents who gave poor ratings were also asked if they felt any further driver training was required, with some 12.8% agreeing and 75.5% disagreeing. Suggestions for further training included the following:

- Better local area knowledge, including tourism (57% of responses)
- English language training (14% of responses)
- Customer service skills (11% of responses)
- Advanced driving qualifications (7% of responses)
- PHC regulations (4% of responses)
- Disability awareness, including wheelchair handling procedures (4% of responses)
- Cycling awareness (4% of responses)

6.3 Attempted method of hire

In order to measure demand suppression, all respondents were asked to identify whether or not they had given up waiting for a taxi at a stance or on the street, or given up waiting for a taxi or private hire car booked by telephone, or through an online app in Edinburgh in the last three months. The results are summarised in Figure 6.5.

Figure 6.5 – Latent demand by method of hire – Given up trying to make a hiring?



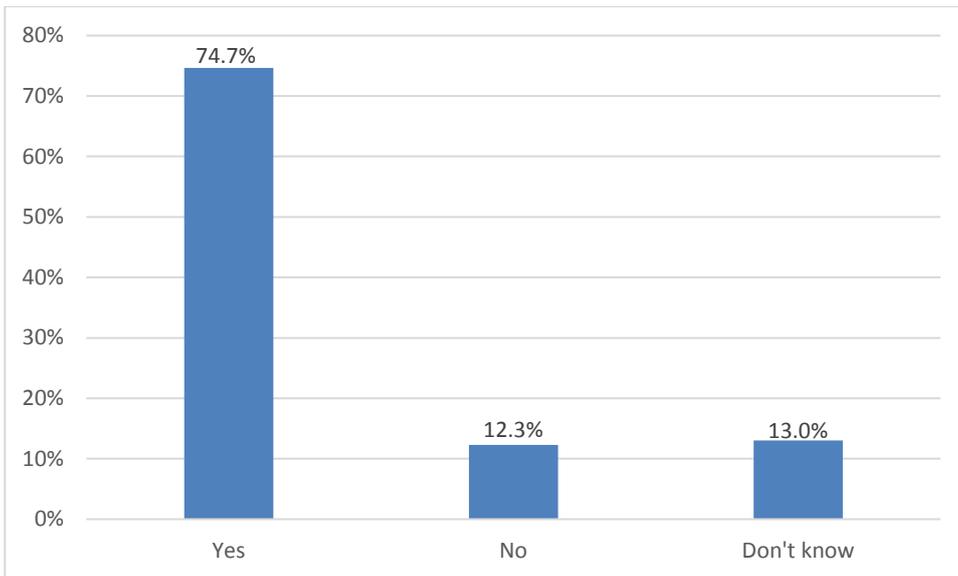
As indicated in Figure 6.5, some 10.9% of respondents had given up waiting for a taxi at a stance and/or by flagdown in the last three months. This has implications for the interpretation of the results (see Chapter 8 below). This is a decrease to the figure identified in 2013 (15.1%).

Respondents who had given up trying to obtain a taxi or private hire car in the last three months were asked the location where they had given up waiting. The most common areas respondents gave were the City centre, Airport and Leith. In addition, the majority of respondents giving up (55%) had given up waiting at night.

6.4 Service Provision

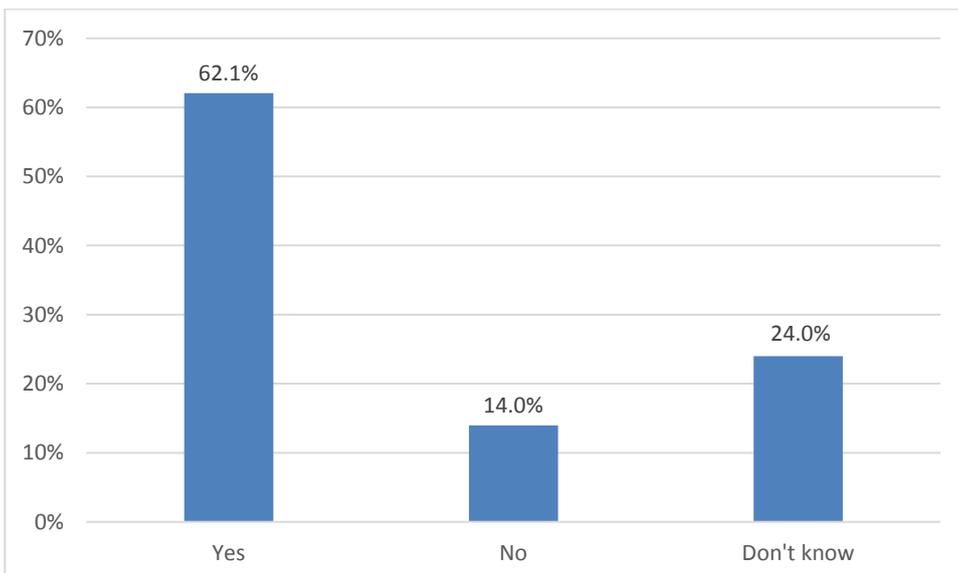
The difference between a taxi and private hire car was explained to each respondent prior to asking participants whether they feel there are enough purpose built taxis in Edinburgh at the current time. Some 74.7% (625) commented that there are sufficient taxis in Edinburgh (see Figure 6.6).

Figure 6.6 – Are there sufficient taxis in Edinburgh?



The survey then asked respondents whether they supported the policy of restricting the number of taxis licensed to work in Edinburgh to 1,316 licences. Some 62.1% (520) of respondents supported the policy (see Figure 6.7).

Figure 6.7 – City of Edinburgh Council currently follows a policy which restricts the number of taxis licensed to work in Edinburgh to 1,316 licences. Do you support this policy?



The survey then asked respondents whether taxi or private hire car services in Edinburgh could be improved. Some 36.8% (308) felt that they could be improved while 38.1% (319)

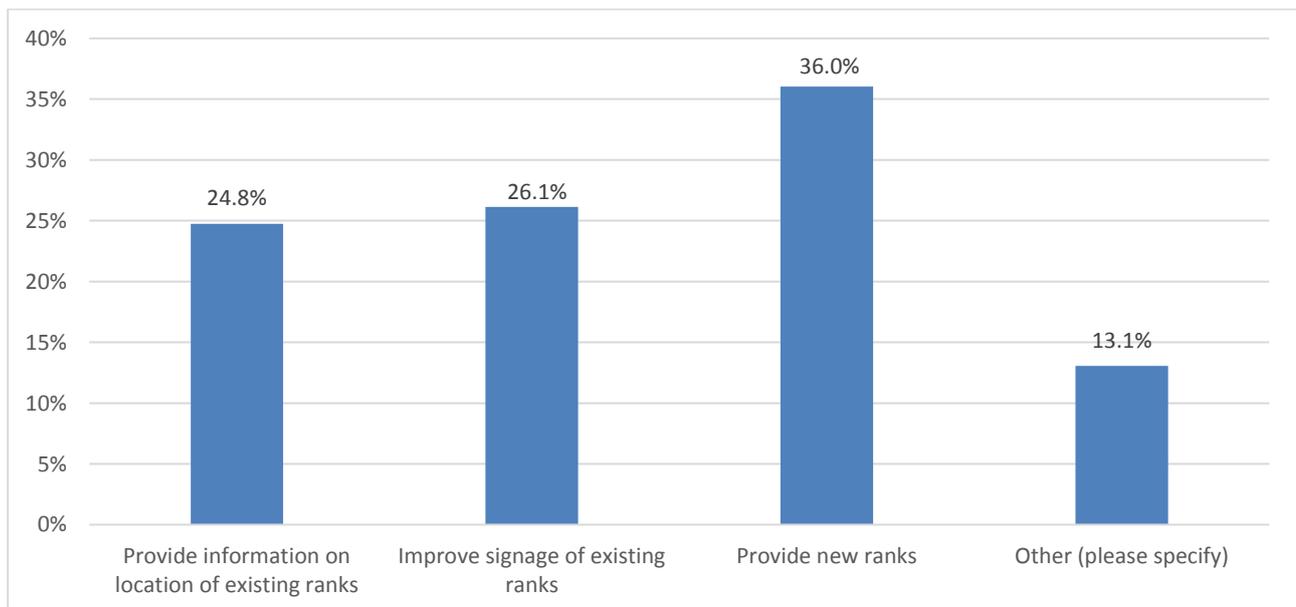
thought no improvements were needed and 25.2% (211) were unsure. Suggested improvements included:

- Cheaper taxis
- Increased taxi numbers
- Better quality vehicles
- More vehicles at peak times
- Improved driver attitudes

6.5 Stances

Respondents were asked if they felt there was sufficient provision of taxi stances in Edinburgh. Some 50.1% (420) of respondents felt that there are currently enough stances in Edinburgh, 35% stated that there wasn't sufficient with 15% unsure. Suggested improvements from the 34.9% (290) of respondents who answered 'no' are listed in Figure 6.8.

Figure 6.8 – What needs to be done to improve the provision of taxi ranks / stances in Edinburgh? (multiple responses)



Other suggestions made on improving the provision of taxi stances were as follows:

- Improvements to Waverley Station (30% of responses)
- Prevent PHCs, private cars and vans from parking in stances (19% of responses)
- Larger / improved stances in existing areas (14% of responses)
- Better station stances beyond Waverley Station (10% of responses)
- More taxi marshals (10% of responses)
- Reduce number and size of stances (6% of responses)

Provision of sheltered stances, better disability access, and improved stance occupancy were also mentioned as potential improvements.

Respondents were asked if there were any locations in Edinburgh where new stances were needed. A total of 20.1% (70) said that no new stances were needed in Edinburgh whilst 32.5% (113) stated they did not know. The remaining 47.4% (165) of respondents who stated that they would like to see a new stance were asked to provide a location. The most common locations cited included:

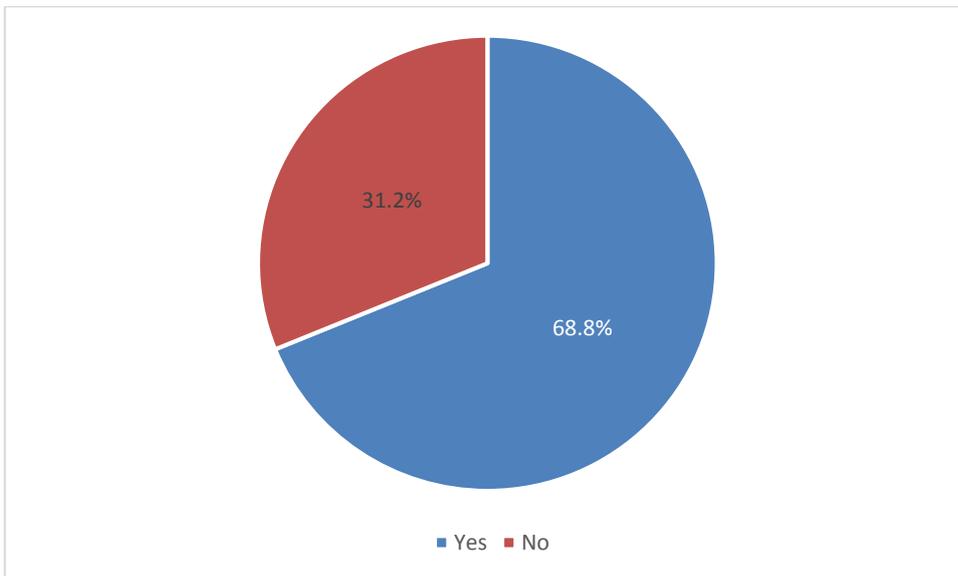
- General City Centre
- George St
- Waverley Station

Respondents were asked if they had a preference between taxis or private hire cars when ordering a licensed vehicle, with some 61.8% (506) preferring taxis, 17.9% preferring PHC (147), and 20.3% (166) expressing no preference. Reasons for preference included the following:

- Black cabs have better geographical knowledge;
- Uber are cheaper;
- Easy to secure vehicle via an app
- Prefer black cabs as feel secure due to partition;
- Black cabs are too expensive;
- Black cabs have better driving standards.

Respondents were finally asked if they were aware that Edinburgh Airport offered a choice of taxis and private hire cars, with some 68.8% (563) of respondents aware of this.

Figure 6.9 – Did you know that at Edinburgh airport you have the choice of a taxi or a private hire car?



6.6 Summary

Key points from the public attitude survey can be summarised as:

- Some 24.7% of hiring's are from a stance;
- High levels of satisfaction with delay on last trip – hiring by app providing the highest levels;
- Some 10.9% of people had given up trying to obtain a taxi at a stance or by flagdown;
- Some 36.8% of people felt that taxi services could be improved – more provided at peak times and better customer service; and
- Some 47.4% of people believe that new stances are needed.

Consultation

7.1 Introduction

Guidelines issued by the Scottish Government state that consultation should be undertaken with the following organisations and stakeholders:

- All those working in the market;
- Consumer and passenger (include disabled) groups;
- Groups which represent those passengers with special needs;
- The Police;
- Local interest groups such as hospitals or visitor attractions; and
- A wide range of transport stakeholders such as rail/bus/coach providers and transport managers.

In order to consult with relevant stakeholders across Edinburgh, written consultation was undertaken.

7.2 Direct (face to face) Consultation

Several stakeholders were invited to attend a series of focus groups. This assured the Scottish Government guidelines were fulfilled and all relevant organisations and bodies were provided with an opportunity to comment. Following the focus groups the written minutes were circulated for comment to the attendees. A summary of the responses received are provided below

7.2.1 Hackney Trade

All attendees felt the key current issue for the trade was that private hire car numbers had doubled in Edinburgh in the last year. They felt this was due to CEC reducing the cost of a vehicle licence for PHCs by two thirds. It was felt that CEC implemented this price change with no trade consultation. Following the price drop the trade reported that there were over 800 applications submitted for PHC licences. The representatives at the meeting raised concerns that the market in Edinburgh cannot sustain increased vehicle numbers on this scale.

Attendees noted that job numbers were down, it was difficult to fill night driver shifts and that taxis were for sale and attracting no buyers in the current market.

They noted that while there was now legislation in place to theoretically limit private hire car numbers it is not possible to measure demand at stances so they understand that CEC would be reluctant to implement this without further guidance.

It was felt that licensing fees have increased overall and it is only the PHC and the Taxi vehicle licence which fell in price (which attendees said CEC stated was due to a surplus).

Inspection fee, driver plates and overall costs are felt to have increased from 1 year ago. They state that CEC have plans to increase the fees again.

The attendees felt there was some illegal operating happening in Edinburgh with private hire cars on various fleets transferring to Uber on Friday and Saturday evenings to benefit from surge pricing. They also felt that PHCs illegally ply for hire on the street in the city centre at peak times. It was considered this was a particular issue at Cowgate, Hanover Street and Grassmarket/George Street.

The attendees stated they rely on the peaks in demand to make a living and they need proper enforcement to prevent illegal PHC plying. They state that CEC have said they do not have budget to undertake any further enforcement and feel that if this is the case why were vehicle licence fees reduced due to a budget surplus. Edinburgh Taxi Association noted that as CEC were unable to undertake the enforcement they had requested, the association had organised their own mystery shopping tests to catch those illegally plying for hire at peak times.

They felt that the public do not always perceive a difference between PHCs and taxis, particularly younger generations.

Training

The attendees noted that new training was being implemented for new and existing drivers. They felt that replacing the old training (of a series of modules where attendance resulted in a pass), with a requirement to undertake a City and Guilds qualification could increase quality. However, there was concern that whilst any recent consultation with the council had been around training, one year on they still did not have firm details on the content and cost of the proposals from the Council.

The attendees felt that driver standards were currently good and had not recently changed. There were concerns raised about the justification for changes to the training requirements. They noted the Council had told them the changes were to address an increase in the number of complaints but they were unable to provide evidence on the complaints figures when requested through an FOI (rejected). The attendees believed that only 0.6% of jobs they completed resulted in a complaint and felt that misleading figures had been presented to CEC committee.

There was a general feeling that while there was no objection to training in general any further barrier to entry would be a concern given the current driver recruitment problems. They felt several the proposed modules (such as first aid) were not necessarily relevant to their role.

There were varied opinions over the proposal that the Council will deliver the new training themselves with concerns raised that it was a Council revenue generation exercise. Some attendees noted that whilst the current Telford College offering was poor, having varied seats of learning involved in the training could improve the standing of the training implemented.

Several of the attendees noted they had concerns over the numeracy and literacy standards of some drivers and they hoped that the new training would address these.

Vehicle quality

Attendees felt that the range of vehicles available to them was ok though costs are increasing. The E7 has gone out of production and the new version is not wheelchair convertible. This will mean drivers looking for a new vehicle will need to consider the Ford Transit conversion which is currently £5k more than an E7. They also note that the TX4 is over £40k and being discontinued at the end of 2017 and the TX5 is due to be a hybrid vehicle with a price point expected to be around £53k.

They note that there is currently no age limit in place for taxis although CEC have gone out to consultation on vehicle age limits and emissions levels. A number of representatives expressed concern that an age limit being introduced would mean their vehicle would be worthless on reaching the limit and they would need to write off their £45-50k investment. This concerned those at the meeting as they note that vehicle owners are increasingly unable to keep up with finance payments on vehicles due to the current market. They cited examples of vehicle owners selling their newer vehicles and buying old TX1s that had been used in London before they were banned there. They feel the age of the fleet has been increasing significantly.

Stances

Since the previous unmet demand survey many stances have been shortened due to the tram being implemented and there is a reduction in overall stance space. The stance within Waverley Station was also closed for security reasons. The attendees noted informal ranking was in operation at Waverley Steps (Balmoral hotel Princess Street) as this is where people exit the station and look around for a taxi. They would like to see a permanent stance in this location perhaps consisting of a 2 space stance with a feeder around the corner.

There was consensus that the Waverley Station drop off and pick up point at Calton Road was not in a useful location and passengers did not use this facility.

Trade representatives have met with Waverley Station management and note there are plans to implement a stance in the New Street Car Park. There are concerns this location is at the wrong side of the station and unless a passenger is travelling East it will result in an increased fare. The representative at the meeting noted that there are land ownership issues to overcome in the development of this stance as some of the land belongs to Network Rail (NR) and some to CEC. They are concerned that the planned stance will be subject to a fee for drivers wishing to use it and feel a fee should not be implemented in this location and that CEC should not lease the land to NR in order for NR to charge a fee to drivers.

The trade wished to see the Market Street stance outside the station relocated to under North Bridge.

The attendees expressed disappointment that the Haymarket Station stance (which took three years to agree and involved the relocation of a number of bus stops) will be removed to allow a new east/west cycleway to be implemented. They believe the council have proposed a small 3 car stance in the current drop off point with a feeder stance (operated with cameras) located separately round the corner. However the land is owned by NR and they have yet to agree the proposal.

In general the attendees noted that there is a lack of consultation from CEC on changes to stances and changes often do not take into account the one way system. They felt that CEC make decisions and inform the trade rather than engaging and consulting with them.

It was felt that the enforcement of current stances was an ongoing issue. There are instances of construction workers using stances for the loading/unloading/storage of materials including recently on Frederick Street and George Street. They felt that a number of stance markings were also very faded which did not help in enforcement. They want to define, repaint and enforce their existing stances prior to requesting stances in new locations. They noted that the stance at Baxter Place was in urgent need of repainting. The issue has been raised by attendees at the Councils Taxi Stance Working Group but at this time they had been unable to progress repainting due to the budget responsibility for this activity being unclear.

Wheelchair access

A number of attendees stated they thought too many drivers (18%) had medical exemptions to not take wheelchair passengers and noted that those over age 65 have an automatic exemption. They felt that as the age profile of drivers in the trade increases and new drivers are not attracted into the industry this percentage will only increase further. Exemption certificates must be displayed in the cab.

They reported that even drivers without an exemption are entitled to undertake individual risk assessments at each job to reflect the particular situation and they can decline to load a wheel chair passenger if it is a risk to themselves.

It was reported that during a recent tender process for the taxi card in Edinburgh, CEC wrote to 70 organisations representing those with disabilities and only four responses were received. Attendees at the meeting felt this indicated there is not an issue with the provision of services for those with disabilities.

Consultation

The trade noted there are two groups which should meet quarterly. The Taxi Stance Working Group (TSWG) is for the taxi trade only and has not met in over two years at this time. There is also a hire car consultation group which is for both the taxi and private hire car trades. Until recently this group had not met in over three years but there have recently been three quarterly meetings.

Fares

Some attendees felt Tariff 1 was too low at £2.10 (and tariff 2, £3.10 from 6pm). They stated they wanted to focus on this in the next fares review as they were too low considering the vehicle and driver standards in place. It was noted by another attendee that increasing fares in line with CPI is not sufficient at this time and that the cost of living in the city should be considered with a fares increase implemented on the 1st April annually.

Attendees generally felt that Uber fares were not too different to taxi fares in the city once the introductory discounts had been used by customers, though they noted that surge pricing at peak times was more expensive than taxi fares.

Other issues

Attendees raised concern over the CH2M methodology for calculating Significant Unmet Demand. They raised concerns over the measurement of activity and influence of stances where fees are paid to allow access or where a permit is required, particularly noting the airport stance. LR explained that the measurement of SUD takes account of influences such as the effect of permitting at particular stances and also issues such as traffic management in order to ensure the measure is accurate.

7.2.2 Private Hire Trade

Demand and limitation

One respondent felt that the level of demand overall had remained at a consistent level but that he expects the demand survey to show that stance hirings have fallen. He noted that there are currently 75 taxi licenses for sale in Edinburgh. In February 2016, he believed licences would sell for £40k + the vehicle cost while now asking prices are around £22k and they are not selling.

It was felt that the bulk of work in Edinburgh was pre booked private hire cars in comparison to taxis.

From a business point of view the representative from ECPH noted that they did not have a strong opinion on the policy of CEC to limit the number of taxis however the power recently given to limit the number of private hire cars was more relevant. As numbers of PHC licences had risen from 900 – 1800 within 18 months they would understand CEC considering limitation. He felt that if a cap were introduced operators and drivers would “up their game” to provide a good service to customers and increase/retain their market share.

The representative from Uber disagreed with this and felt that capping taxi or private hire car numbers may stifle innovation in the market and lead to worse outcomes for consumers, such as higher prices.

The ECPH representative felt that Uber entering the hire car market in Edinburgh was positive as it brought more publicity to the trade in general, however they do not want to see Uber (or other operators) creating a monopoly in the market. ECPH take 35% of their bookings online rather than by phone.

The Civic Government Act was felt to be unfit for purpose by the ECPH representative and he noted the law needed reform.

It was felt that the PHC trade could be treated more equitably with the taxi trade in some regards. For example, both respondents felt that private hire cars should also be able to access the cities’ bus lanes. ECPH added that either both trades should be provided with access or neither trade. It was also noted by ECPH that the PHC trade provided CEC licensing department with two thirds of its income and therefore the PHC trade should be treated more equitably.

The representative from Uber noted that in parts of the UK they are seeing people driving less, giving up their own cars and connecting with PHC’s, which save people the hassle of parking, upkeep and costs such as insurance and fuel. Uber added that if PHC numbers were limited, then this trend may be stifled and a city would only be adding to the many challenges they face including congestion and air quality.

Vehicle and driver quality

One of the respondents felt the overall quality of the PHC fleet in Edinburgh was falling though this was not felt to be the fault of Uber entering the market.

Uber noted an example of how they help to maintain driver and vehicle quality, namely through their two-way driver/customer rating system. At the end of every trip, both passenger and driver rate the experience. Uber then makes it easy in the app for drivers to see how riders have rated their service – which may include vehicle maintenance and driver conduct - and tips for how to deliver a 5-star rating for passengers. Uber says this helps to ensure standards stay high.

Training

Both representatives had not seen details of the new CEC training proposals for PHC drivers and wanted to have sight of the up to date requirements. They felt the scope of the training needed to be carefully considered. For example, if drivers were trained in first aid the training should consider issues around liability and responsibilities should first aid go wrong. They felt that any training introduced needed to be about raising overall standards and not creating barriers to enter the market or a revenue generation opportunity for the council. It was felt that a recognised educational body should deliver the training and running it in house within the Council could be an opportunity to generate revenue.

The EPHC representative felt that driver quality was falling and said that 90% of the complaints he saw were in relation to drivers rather than fares or vehicle quality. They felt that English language and communication skills were sometimes a problem but hoped these would be addressed in any new training.

The representative from Uber felt driver and vehicle standards were good and it was not in their interest for them to fall. They feel their onboarding process makes clear the standards of conduct expected – not to mention the licensing process that includes rigorous background checks - and helps maintains a high quality service.

Uber feel they play a key role in tourism in the city as tourists simply open up their app and can obtain a vehicle without finding out local numbers or finding taxi stances and there is no requirement to have local currency. When accessing the demand for hire cars in Edinburgh we must consider the key role of tourism and the extra demands this places on the industry.

7.2.3 City of Edinburgh Council and Police Representatives

Numerical limit and legislation

Legislation has been introduced allowing the authority to limit PHC numbers but there has been no guidance on how to implement this. The representatives considered that if there were overprovision license applications would be likely to stop. They noted that the Council will consider matters of overprovision of PHCs when the Scottish Government issues its guidance however, unless the guidance is robust, then the practical application of such a policy could prove problematic and will require careful consideration.

Regarding the limitation on taxis, the Council note that they will be guided by the evidence of the latest unmet demand survey. They noted that there appears to be empirical evidence of a surplus of taxis available at some times of the day and a shortage at others. i.e. night time and this would not necessarily be addressed simply by the issue of additional licences and increasing overall numbers. The representatives noted that the stances are often full during the day and there is over ranking at several locations while they receive reports of not enough drivers working at night.

Uber are now operating in Edinburgh and are only permitted to use Edinburgh licensed drivers and cars in contrast to other parts of the UK. There is no evidence that they do not comply with this condition.

Driver quality

The representatives stated that trade members had voiced concerns over the topographical test. CEC representatives confirmed that the scope of the test and the pass mark have not changed. The only difference has been in relation to the test papers themselves with each new test being generated from a set bank of questions rather than rotating a small number of fixed test papers. The test can now be sat as often as applicants want and even without an application in place. This has led to more repeated tests which make the pass rate artificially low.

There are around 50 complaints per month and more complaints are received about taxis than private hire cars. Some of the complaints are driver against driver and relate to perceived seagulling (illegal plying for hire by private hire cars). The volume of complaints are not high but some of the complaints are serious. The representatives feel that any complaints are too many. There are some complaints regarding drivers not accepting wheel chair passengers and some regarding ramps not working and missing straps meaning wheelchair users cannot be transported.

CEC state there are 263 taxi drivers holding Wheelchair Exemption Certificates on medical grounds. It is felt the figure is too high but now all medical exemptions must be reviewed on license renewal.

There is a driver dress code in place and the representatives noted that the two main taxi companies (and the two main PHC companies) have their own corporate clothing and

require a standard of dress from their drivers. However, they noted that there can be a lack of adherence to the dress code among other drivers (predominately, though not exclusively, amongst 'street cars') and that this is not always enforced sufficiently.

Vehicle quality

The representatives did not have any observations on vehicle quality and felt that Pat Trainer in Fleet services at the Vehicle Examination Centre would have a view on if the overall standard of vehicles was changing in any way.

Stance / rank locations

The representatives noted that an illegal stance at Waverley steps has become an issue. CEC Highways have investigated the possibility of introducing a stance in this location but have concluded it is not possible due to the requirements for bus stops and a loading bay in this area along with the road layout and nearby signalised junction. Recent enforcement action at this location led to 20-30 drivers charges.

There have also been over ranking issues at Waverley Bridge which has led to the introduction of planters by CEC at the end of the stance to avoid over ranking and the blocking of an access road.

There is a temporary stance in East Market Street which is a logical location to implement a permanent stance. The temporary stance was originally under the bridge close to the station entrance but it had to be moved due to maintenance issues with the bridge above. The Electric Club Circus would be likely to object to a permanent TRO in this location.

Network Rail are also considering a station stance in the New Street Car Park. Taxis are already permitted to drop off and pick up in this location.

It was noted that all licensed taxis can use the stance at the airport but because it is operated by one company other companies have a self-imposed ban on using the stance and have instructed their drivers not to use it.

Fares

There has been no increase in fares since 2013 due to the involvement of the traffic commissioner in the last review carried out.

It was noted that Uber standard fares were around 30% cheaper than the current taxi fare card while Edinburgh Private Hire were around 20% cheaper. Fares will be reviewed later in the year.

7.2.4 Access Panel

Vehicles and Availability

The representatives attending were all regular taxi users and had varying preferences for the type of vehicle, companies used and booking. An attendee who is visually impaired noted they preferred saloon vehicles rather than stepping up into a black taxi. One attendee noted they preferred City Cars and found them very reliable. Another attendee held a contract with a taxi firm to ensure he always had taxis available when he needed them and had a convenient way to pay. The group noted that E7 vehicles are very spacious but they are not suitable for passengers that need to hold on. The height of the step in purpose built cabs is also an issue for some non-disabled people including the elderly and shorter passengers. They felt that maintaining a mixed fleet in Edinburgh was critical as there is no single design of taxi that is suitable for all needs.

It was felt that availability was generally OK though there could be a shortage at the weekend, public holidays and during events. The group commented that availability was generally better near the centre and while the availability of wheelchair accessible vehicles was OK, if you request a particular type of vehicle, for example E7 then there could be a longer wait. Some members of the group felt that booking in advance was useful and ensured a reliable service. However, another group member noted that when booking in advance the taxi can be late and sometimes the operator puts out a call that is not picked up by a driver and the booking is lost with no driver allocated to the call. It was generally felt shorter advance bookings were more reliable, (for example 1-2 hours in advance).

The group felt that the vehicles they used were usually clean and tidy. It was noted by one attendee that the vehicle did not need to be new and smart but being clean was very important.

Attendees felt that they became familiar with the companies they used and tended to stick with them. They generally only considered changing companies once they had an issue.

Drivers

The group felt that drivers were usually very polite and cheerful. An attendee noted that visually impaired customers need the driver to deliver them to their final destination. Some drivers don't describe the route when doing this, for example telling them when a step is coming up. Customers tend to ask drivers to do what they need rather than drivers knowing what is needed.

The group felt that overall training was good and black cab drivers are more consistently trained. They noted that training is carried out by Lothian Community Transport Services. It was felt by some members of the group that training could be improved by using disabled people to help deliver the training. If this were trialled it could be evaluated by asking the drivers if they found it useful.

The group noted that a large proportion of drivers of accessible vehicles were medically exempt from loading wheelchairs. They said that taxis are sometimes sent out to calls and the drivers are unable to assist them. This should be picked up during the booking process and allocation of the job. They felt around 2% of journeys were affected.

Fares

The group agreed that PHC fares were lower than taxi fares. One attendee noted that if private hire car operators published their prices and carried out some publicity this may encourage them to shift between companies but otherwise passengers stay with whoever has offered them a good service until they have a reason to move.

The group discussed the taxi card scheme that is in operation in Edinburgh which allows those with disabilities that make using public transport difficult the option of discounted taxi trips instead of a bus pass. The scheme offers 1 return trip per week (104 per year) with discounts on the metered fare available of £2 for a short journey and £3 for longer journeys. This can currently be used with various operators but the group were concerned that when the new contract came in they would be limited to using Central which are a taxi firm operating black cabs. They understand that the firm need to obtain some saloon vehicles in order to offer taxi card customers choice but they are concerned it will restrict them.

Ranks / Stances

A wheel chair user noted that at stances vehicles sometimes disappear from the stance with no passengers when they see the electric chair in the queue in order to avoid having to take a wheel chair passenger.

The group felt that stances across Edinburgh were generally alright in daylight hours and where passengers were familiar with the location but otherwise they would avoid obtaining a taxi at a stance.

The group noted there was currently a problem at Waverley Station as there was no consolidated stance which was confusing for people not familiar with the area as well as locals. They felt that the publicity around changes to drop off, pick up and taxi stances around the station were insufficient and people were unaware. The group wanted to see a stance within Waverley Station but noted that they were aware of plans to implement a stance in the New Street Car Park which would be operated by a taxi marshall. The group thought this may work if the marshall was allowed to collect people from the access assistants helping passengers on and off trains.

The group noted the current drop off point at Calton road was unreliable and people did not like waiting for taxis here. They noted that taxi drivers were in a poor situation due to the lack of drop off points. They either leave their car illegally to help frail or disabled people out of the car and into the station, or they abandon passengers in unsafe areas without assisting them into the Station. One attendee noted they were now unable to use this station anymore

due to drop off issues and the poor pick up provision. They felt this would also be an issue for many other people.

The group would like to look at using the northern ramps to access the station and the group are working with MSP's and transport ministers in an effort to resolve the stance issues at Waverley.

The group noted that taxis were permitted to use bus lanes and PHCs were not. They said this could lead to passengers choosing a taxi over a PHC for particular journeys at busy times when they would really prefer a saloon vehicle. They noted that Handycabs and Community Transport Services use the bus lanes too.

Other

The group noted that the 20mph areas in the city had slowed taxis down and as the taxis were slower the cost increased.

It was noted that none of the group had used Uber. They said they were reluctant to move away from companies already offering a good service and that Uber does not include information on accessible vehicles.

The group had heard no reports of people with guide dogs or hearing dogs encountering issues when using taxis.

7.2.5 ECAS

Vehicle availability

This voluntary organisation assist physically disabled people offering befriending and running classes for disabled people. The organisation generally use taxis and private hire cars between 9am and 3pm when their services are running and do not usually have any issues obtaining vehicles. They note that sometimes waiting times are longer on a Friday afternoon when taxi services are subject to higher demands. If a specific vehicle model is required the waiting time can also be longer, particularly when an E7 or M8 is requested to transport a passenger in a larger chair.

They reported that prebooking makes no difference in the level of delay encountered when waiting for a vehicle and felt that prebooking should provide some priority and ensure a taxi was there when required.

Vehicle type and quality

The representative felt the current mix of vehicles available in Edinburgh was good and it was important to keep the current vehicle choice as no one vehicle was suitable for all people. Some of their users prefer saloons while others prefer or require purpose built black cabs.

The standard of vehicles is generally felt to be good and the organisation had encountered no issues with cleanliness.

Driver quality

The organisation feel that generally the quality of drivers and the level of customer service offered is of a good quality and few issues have been encountered. When there are issues these are fed back to the taxi and private hire car operators who are very effective in dealing with problems quickly. They noted that positive feedback is also provided where drivers go above and beyond the usual level of service required.

Several examples of problems encountered were provided. Occasionally the wrong type of vehicle can be sent when a particular model is requested.

An anecdotal story was provided of a service user who was in a wheelchair but preferred travelling by saloon vehicle and usually encountered no problems. Recently one saloon driver refused to take her and did not communicate what the issue was and why she could not travel in his cab. While there may have been an issue, effective communication may have prevented any ill feeling and misunderstanding.

Another passenger asked a driver not to take a particularly bumpy route due to some health concerns and how the vehicle bumping would affect them. While several route choices were available the driver ignored the passenger request and took the route he had been asked to avoid. Ecas complained to the operator on this occasion and were told the driver would be spoken to.

While most drivers are very good a few seem to lack common sense and there may be some training required. There have been instances of drivers who appear to have forgotten their training and seem unsure how to correctly secure wheelchairs into their vehicles. This can lead to passengers feeling unsafe. It was noted disabled passengers can generally feel more secure when drivers are chatty and interact with them. In terms of additional training requirements, it was felt that it would be useful for all drivers to undertake disability awareness training in order that they were aware of issues, had knowledge of common conditions and knew how to interact with disabled people.

Accessibility

The representative felt that to improve vehicles, access ramps could be made lighter on new vehicles as many drivers appear to struggle with these and new technology could make this easier.

Fares

The representative felt that while fares always seem high they don't appear to have increased significantly recently and the representative understands that vehicle and fuel costs have been increasing so these justify the current fares.

In the past there has been confusion from drivers over when to start the meter and some have started this before loading a disabled passenger rather than when they are ready to depart. This does not happen so much now but has been an issue occasionally.

Safety

While most service users do not use taxis at night, the representative felt that the taxi marshals at stances were positive and helped keep the queue order and people feel safe and secure at night.

7.3 Indirect (Written) Consultation

Several stakeholders were contacted by letter and email. This assured the Scottish Government guidelines were fulfilled and all relevant organisations and bodies were provided with an opportunity to comment.

In accordance with advice issued by the Scottish Government the following organisations were contacted:

- City of Edinburgh Council;
- Trade representatives;
- User/disability groups representing those passengers with special needs;

- Local interest groups including hospitals, visitor attractions, entertainment outlets and education establishments; and
- Rail bus and coach operators.

A summary of the responses received are provided below.

Robin Wickes, Edinburgh Access Panel

Robin felt that there should be a greater quantity of readily available information on where taxi stances are located in Edinburgh, especially in the city centre. He also expressed concern regarding the provision of taxis at Waverley Station and that they were in urgent need of improvement. He felt that there is a strong requirement for a main consolidated stance with clear signage for passengers arriving by train as the current ban on vehicles at the station itself has resulted in taxis dotted about the surrounding side streets in a fragmented way. He also felt that there is also a requirement for drop-off and pick-up to take place at the same consolidated stance.

Rose Rodent

Rose felt the taxi supply seems overly concentrated in central areas and that drivers are often unwilling to pick up wheelchair users. She has also encountered difficulties when attempting to set up a contract journey with a private hire company. When asking for a quote for contract fares, massive premiums are added.

In relation to the image of the taxi trade, she would like to see more of the Peugeot E7 vehicles as she finds them the most accessible as a wheelchair user and does not feel safe traveling in a TXII vehicle. She feels taxis need to be made more accessible, including ramp access to the vehicle, and driver behaviour improved to increase ride quality for disabled passengers.

Rose felt that taxi locations near to Waverley station are insufficient, especially for passengers who are sight or mobility impaired. She also felt it should be easier to find the location of taxi stances in general.

Regarding pricing, she objects to taxis costing more during the festival, whether the journey has anything to do with the festival. Fare supplements for the festival should affect festival goers only.

Rose does not feel safe at the Market Street Waverley stance due to cabs approaching from multiple directions and difficulties in telling which car you should approach if someone is getting into the front one. She also feels that facilities need improving to allow easier access by disabled passengers.

Transport integration would be improved by having taxis in a more usable, tidy location for Waverley Station. There are also currently no taxi stances to integrate with the trams between Haymarket and the airport.

John Ballantine, Edinburgh Access Panel / Handicabs Lothian

John felt the supply of taxis and private hire cars is generally adequate but that there can be shortages at busy times of day and public holidays. He felt that the restriction imposed on the number of taxis does not benefit disabled people.

There are regular complaints about the poor driver attitudes towards disabled passengers, especially wheelchair users, emphasizing the need for better disability awareness training.

John states that it is impossible to know where all the taxi stances are as they are not always in the most suitable places and it is not easy to find out this information as many disabled people are unable to use apps. There is a need for better taxi stances at Waverley and Haymarket stations; he also feels that the presence of Taxi Marshals can be beneficial.

John highlighted the need for a diverse fleet to accommodate as many needs as possible as no taxi is equally accessible to wheelchair users, mobility impaired, and partially sighted people.

The Taxicard scheme is underfunded and cards are difficult to obtain because the city council have severely cash limited the scheme to restrict its use. There is no shortage of publicity information about services being available but fare levels are sometimes difficult to compare.

John felt that safety whilst a passenger in a vehicle is generally good but less so whilst waiting for taxis at stances or in the street and the presence of taxi marshals is to be encouraged. Persons should report any instance where they feel threatened or unsafe to the authorities (e.g city council or the Police) as soon as possible after the incident.

Robert Gormley (responding as a member of the public)

Robert has had no issues with obtaining a taxi anywhere in Edinburgh but does however tend to pre-book taxis rather than hail them. He supports restricting the number of licences as he feels the market could be flooded with taxis without a cap, forcing some out of business and reducing the availability of taxis (or the creation of a monopoly) after the "crash".

Vehicle conditions appear adequate as few dirty, tatty or damaged vehicles are seen on the road. Driver appearance and quality also seems fine. However, there is a persistent minority of drivers who consider themselves beyond the rules for "ordinary" drivers, and consequently ignore the rules of the road, including speeding and bullying vulnerable road users. This could be addressed by regular road safety training.

Robert feels the stances he is aware of are well distributed. He is not sure if additional stances are required but regularly sees stances that are over-flowing - notably on the Royal Mile (High Street) and Market Street. He attributes this to them being profitable stances, with drivers opting to wait on single or double yellow lines instead of going to other nearby stances.

Taxi fares seem appropriate and drivers have been professional to fares at all time. Robert is not very conscious of advertising for either taxi or private hire services, beyond seeing the vehicles themselves.

Robert has felt safe using Edinburgh taxis but has felt threatened by the behaviour of a minority of drivers when not in the taxi, due to the nature of the driving, sounding of horns and aggressive threats by the driver. These have almost exclusively arisen when the driver has taken exception at vulnerable road users "getting in their way".

Taxi integration with trains and flights seems good but could be improved with buses. The exclusion of taxis from Waverley Station does seem to have been a backward step though.

George Lowder, Transport for Edinburgh

Taxis and private hire cars 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 cars should be world class, environmentally friendly and socially inclusive. Taxis and private hire cars provide complementarity, where the existing network ends or to fill gaps in the existing network and further customer choice.

To be a worthy partner in this, TfE would expect taxis and private hire cars 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 cars should be encouraged by policy and quality partnerships.

There is ongoing work to better integrate taxis and private hire cars into existing and future transport interchanges, hubs and nodes. This is an area that is recognised for improvement.

Jennifer Moir, Deaf Action

Deaf British Sign Language users who have taxi cards to help with the cost of travel are excluded from benefiting from these fully due to the rules of use, specifically that to use the card you must either book a taxi or ask at a stance for a Taxicard booking (taxis cannot be hailed in the street). BSL users cannot phone and book; getting to a taxi stance is not always possible due to mobility issues. The lack of flexibility is not helpful and companies have generally been resistant to operating a service via a simple text message, preferring apps or

online. Although taxis are not public services as such they should be accessible due to Edinburgh Council managing the Taxicard scheme.

Superintendent Richard Horan, Police Scotland (Edinburgh Division)

Police Scotland are content with City of Edinburgh’s assessment of supply and restriction of taxis and private hire cars.

Police Scotland support City of Edinburgh Council’s standards on vehicles and drivers, and play an active role in the investigation of complaints in relation to standards of driving. We would support additional training in this area if required.

Police Scotland works closely and the City of Edinburgh Council on all issues relating to safety. There are robust procedures in place that enable Police Scotland to proactively deal with or raise safety issues with City of Edinburgh Council. City of Edinburgh Council consistently show a willingness to listen to and act on Police concerns. With regards, specifically to taxi marshals, Police Scotland recognise the excellent role the marshals play in preventing anti-social behaviour and violence. There is clear evidence of the benefits of taxi marshals, particularly at stances in the city centre, and their use is strongly supported.

Alan Dean, City of Edinburgh Council (Public Transport Officer)

We recognise the importance of the licensed taxi trade, as part of the wider public transport network, in providing a wide range of customers with 24 hour, reliable, safe, secure connections to any destination in the city and surrounding areas. It is essential that vehicles have access to stances that are in the correct, preferably high visibility, locations to satisfy passenger demand and enhance good connectivity and integration with other transport modes in the city such as train, tram, air and bus. It is also essential that these stances are properly maintained with regards to effective and enforceable lines and signs. Recent feedback from taxi operators indicates that the industry is feeling under significant pressure as a result of competition from increasing numbers of licensed PHCs and the introduction of the Uber App to the city in 2015. Given this, their view is that it has become more important that stances are located in the most appropriate locations that offer proper capacity, ease of access and convenience to transport hubs and retail, business, culture, entertainment locations.

We are aware that a number of drivers are unhappy with the positioning and capacity of the stances adjacent to the main rail hubs at Waverley and Haymarket Stations. Design options for stance provision at both stations are currently being worked on but it is proving problematic to find solutions that taxi drivers are happy with. We have been informed anecdotally by taxi representatives that Network Rail are looking at higher capacity stance provision within the current car park area adjacent to Waverley Station but that they would expect drivers to pay an annual fee to use this facility.

It is our understanding that taxi drivers perceive that their needs/requirements with regards to stance provision during the design phases of several ongoing public realm projects and property developments are not given high enough priority and provision is sometimes seen as an afterthought.

With regards to traffic integration and prioritising specific transport modes, the Council allows taxis to use the city's bus lanes during operational hours. There are regular requests from PHC drivers that they also be allowed to use the bus lane network during operational hours however the Council has no plans to change current policy and this is not a change that would be supported by the Public Transport section as we are aware of their importance not only to bus operators in terms of smoother traffic flow, helping to lessen congestion and pollution, and enhancing the passenger experience, but also to the similar benefits the lanes provide the taxi trade.

Peter Hawkins, Spokes Planning Group

Peter's main concerns include unpredictable taxi driver behaviour, especially from PHVs, towards pedestrians and cyclists. Both taxis and PHVs are regularly observed exceeding the 20mph speed limit. Taxis and PHVs should be fitted with GPS and recording devices, so that their speeds could be related to their location; violations could thus be recorded and monitored. This would likely have a profound effect on behaviour.

Deriving the Significant Unmet Demand Index Value

8.1 Introduction

The data provided in the previous chapters can be summarised using CH2M’s ISUD factor as described in Chapter 4.

The component parts of the index, their source and their values are given below;

Average Passenger Delay (Table 5.2)	1.13
Peak Factor (Figure 5.2)	1
General Incidence of Delay (Table 5.3)	7.31
Steady State Performance (Table 5.1)	5
Seasonality Factor (Section 4)	1
Latent Demand Factor (Section 6)	1.109
ISUD (1.13*0.5*7.31*5*1*1.109)	46

The cut off level for a significant unmet demand is 80. It is clear that Edinburgh is below this cut off point as the ISUD is 46, indicating that there is **NO significant unmet demand**. This conclusion covers both patent and latent/suppressed demand.

Summary and Conclusions

9.1 Introduction

This study has been conducted by CH2M on behalf of City of Edinburgh Council (CEC). The overall objective is to provide a full survey of demand for taxis in Edinburgh and to determine whether or not significant unmet demand for taxis exists in terms of section 10(3) of the Civic Government (Scotland) Act 1982. Specific objectives are:

- Determine whether there is any significant unmet demand for taxi services in Edinburgh;
- If significant unmet demand is found, recommend how many licences would be required to meet this.
- To determine public perception of the taxi service provided in Edinburgh
- To determine perception of the taxi service provided in Edinburgh amongst wheelchair users and other people with disabilities/special needs;
- To comment on any areas within Edinburgh city where there may be concern over the provision of a taxi service; and
- To comment on any peak demand times where there may be concern over the provision of a taxi service in Edinburgh city

Objective 1: To measure demand, including latent demand, for any taxi services to the general public in order to determine whether there is any significant unmet demand in Edinburgh city as a whole, or any part thereof.

The 2017 study has identified that there is NO evidence of significant unmet demand for taxis in Edinburgh. This conclusion is based on an assessment of the implications of case law that has emerged since 2000, and the results of CH2M's analysis. On this basis the authority has discretion in its taxi licensing policy and may either:

- continue to limit the number of vehicles at 1,316;
- issue any number of additional plates as it sees fit, either in one allocation or a series of allocations; or
- remove the limit on the number of vehicles and allow a free entry policy.

The number of hours where excess demand was observed has increased since the last study as has passenger delay. However public satisfaction remains high.

Objective 2: To determine public perception of the taxi service provided in Edinburgh.

Public perception of the taxi service in Edinburgh has been obtained through the undertaking of face to face surveys and an online survey. The key results from the survey highlight that

- Some 24.7% of hiring's are from a stance;
- High levels of satisfaction with delay on last trip – hiring by app providing the highest levels;
- Some 10.9% of people had given up trying to obtain a taxi at a stance or by flagdown;
- Some 36.8% of people felt that taxi services could be improved – more provided at peak times and better customer service; and
- Some 47.4% of people believe that new stances are needed.

Overall the public were generally satisfied with the taxi service in Edinburgh. Levels of satisfaction with delay were high.

Just over a third of respondents (36.8%) consider that taxi services could be improved. These improvements related to improving the attitude of drivers and cheaper taxi fares.

Objective 3: To determine perception of the taxi service provided in Edinburgh amongst wheelchair users and other people with disabilities and/or special needs

The views of wheelchair users and other people with disabilities/special needs were determined through focus groups and written consultation.

Overall respondents were satisfied with the current service and range of vehicles licenced. Comment was made as to the need to improve access at Waverley Station.

Objective 4: To comment on any areas within Edinburgh city where there may be concern over the provision of a taxi service

Some 10.9% of respondents to the public consultation indicated that they had given up waiting for a taxi at a stance or by flag down in the last three months. The public consultation highlighted a number of areas across Edinburgh where people had given up waiting for a taxi. These included City Centre, George St and Leith. However there was limited concern with availability of vehicles in general.

Objective 5: To comment on any peak demand times where there may be concern over the provision of a taxi service in Edinburgh city

Case law states that delays associated with peaks in demand are not significant. However, guidance from the Scottish Government states that unmet demand at times of peaked demand should not be ignored. Local authorities should consider when the peaks occur and who is being disadvantaged through restrictions on provision of taxi services.

The stance observations show that demand in Edinburgh exhibits a number of peaks across the day and night time. When these peaks occur at night this correlates to peaks in passenger delay – however passenger delay is generally just over one minute on average.

The observations did identify periods of significant passenger delay – this was all observed during the early hours. Observations undertaken at Leith Walk (Omni Centre) identified periods where passenger delay averaged 20 minutes between 0100 and 0200 on a weekend and 24 minutes at Lothian Road.

9.2 Recommendations

The 2017 study has identified that there is NO evidence of significant unmet demand for taxis in Edinburgh. This conclusion is based on an assessment of the implications of case law that has emerged since 2000, and the results of CH2M's analysis. On this basis, the authority has discretion in its taxi licensing policy and may either:

- continue to limit the number of vehicles at 1,316;
- issue any number of additional plates as it sees fit, either in one allocation or a series of allocations; or
- remove the limit on the number of vehicles and allow a free entry policy.
-

Appendix 2



Edinburgh Taxi Unmet Demand Survey 2017: Summary report

This report was created on Friday 26 January 2018 at 11:36.

The consultation ran from 05/09/2017 to 01/10/2017.

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Question 1: What is your name?

Name

There were 82 responses to this part of the question.

Question 2: What is your email address?

Email

There were 74 responses to this part of the question.

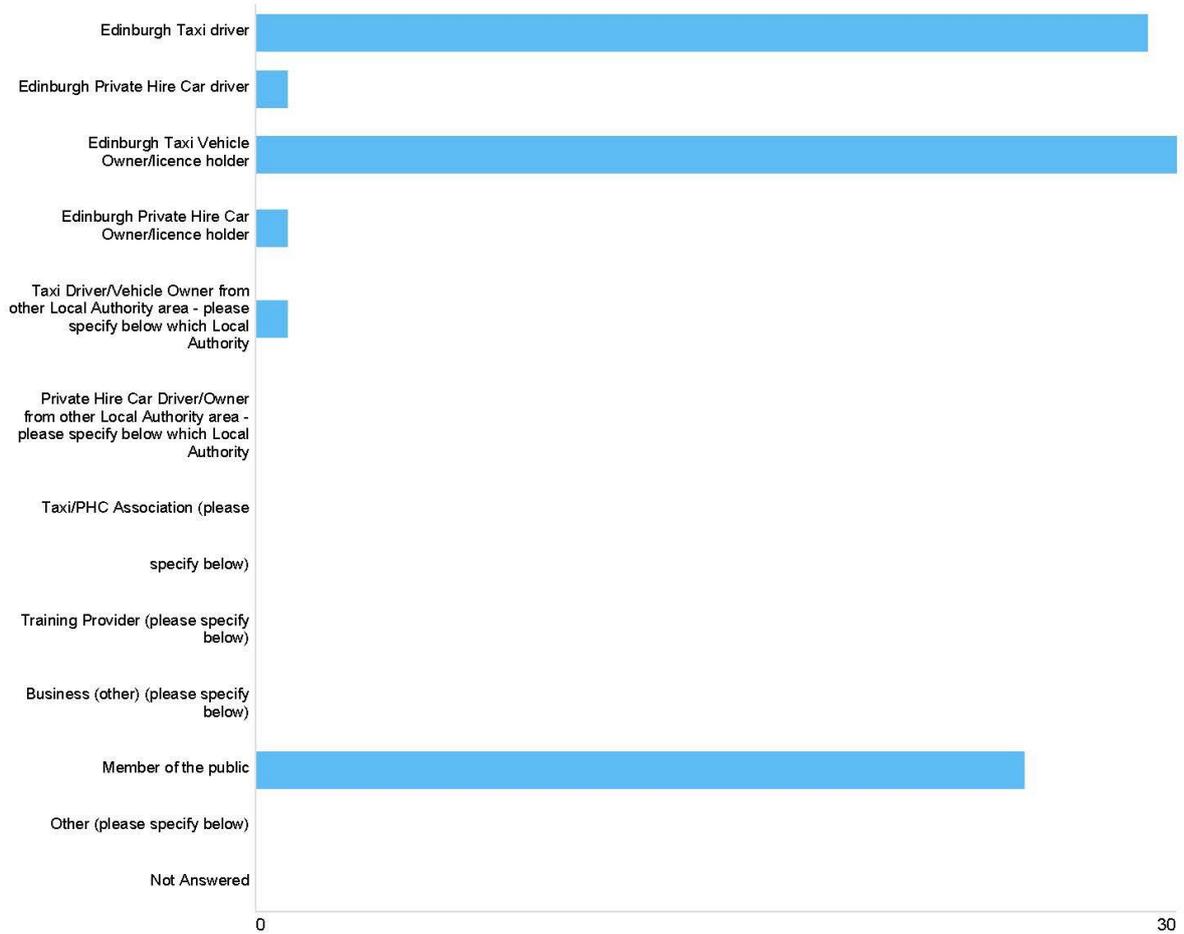
Question 3: What is your organisation?

Organisation

There were 58 responses to this part of the question.

Question 4: Are you:

Who are you



Option	Total	Percent
Edinburgh Taxi driver	29	33.33%
Edinburgh Private Hire Car driver	1	1.15%
Edinburgh Taxi Vehicle Owner/licence holder	30	34.48%
Edinburgh Private Hire Car Owner/licence holder	1	1.15%
Taxi Driver/Vehicle Owner from other Local Authority area - please specify below which Local Authority	1	1.15%
Private Hire Car Driver/Owner from other Local Authority area - please specify below which Local Authority	0	0%
Taxi/PHC Association (please specify below)	0	0%
Training Provider (please specify below)	0	0%
Business (other) (please specify below)	0	0%
Member of the public	25	28.74%
Other (please specify below)	0	0%
Not Answered	0	0%

Who are you (more info)

There were 3 responses to this part of the question.

Question 5: To what extent do you support the Council maintaining the taxi limitation policy?

Support limitation policy



Option	Total	Percent
Strongly agree	72	82.76%
Agree	9	10.34%
Neither agree nor disagree	2	2.30%
Disagree	2	2.30%
Strongly disagree	2	2.30%
Not Answered	0	0%

Question 6: Please use the space below for any comments on any important issues that have not already been highlighted by the survey findings.

Text box

There were 46 responses to this part of the question.

Appendix 3

Please use the space below for any comments on any important issues that have not already been highlighted by the survey findings. -

- Congestion, the amount of proposed transport/roadwork projects including the long term closure of a main traffic artery as in Leith St, adding to that the proposed 2nd Tram route and the fact our city is now saturated with nearly 2000 gas guzzling PH vehicles, it would be madness to add more taxis.
- No safe drop of point at waverley station
- Keeps the standard high and offers everyone a living in quite periods. De regulating the licences would dilute the quality in the trade and ultimately compromise safety.
- Other than the festival Edinburgh has enough black cabs to supply the people of Edinburgh.
- There are more than enough taxis and even more than enough private hire vehicles.
- Cap phc as they are out of control.
- Should also cap phc numbers
- De limiting taxis will cause a flooding of the market where nobody will make a living wage, the cost of a new vehicle is now £55,000 plus, if the limitation was opened up there would be a rapid decline in age and standard of vehicles as nobody could afford them, even at the moment there are drivers doing 17/18 hour shifts to make ends meet with the status quo kept, look at the figures, a new cab, £55,000 payments £1,000 per month, insurance around £200 per month fees to companies like City or Central £600 per month then the service up keep of the cab, then fuel which is around £600 per month, you are looking in excess of £2,500 before you make a penny
- The taxi numbers at present are adequate the service public demand. If anything the private hire numbers should be limited as there has been a massive increase in phc numbers
- Already too many phc vehicles on the road which has severely diluted the available work for both the licenced black taxis and existing phc vehicles. Also, the streets of Edinburgh are bursting at the seams with the existing volume of traffic.

- There is no unmet demand due to the unlimited Phc licences being issued
 1. The high fees charged but Council for black cab tests, licence renewals in comparison with Phc costs
 2. The lack from of Licencing enforcement with regard to Phc,
 - illegally picking up uninsured
 - Attempting to rank on taxi ranks
 - Background checks on drivers
 - Standards of dress of some Phc drivers
 - Phc vehicles without plates or proper signage
 - Illegally using green wave road system
 This is not helped by the lack of proper support given to the cab office, staff etc
 3. There needs to be a dedicated enforcement team working 24/7 to stamp out the wilful breaching of licencing conditions , black cabs too

Sadly We have already had instances of young girls been attacked late at night a major factor has always been the general public have no idea the dangers of illegal pickups

- As CEC have gone to the trouble of commissioning an independent report which states that there is no significant unmet demand and advises the retention of taxi licences at 1,316 there can be no justifiable reason for any increase in the number of taxi licences. It should also be borne in mind the substantial rise in Private Hire licences issued within the past 18 months effectively reducing the potential market place for taxis within traditional "radio" companies via telephone and App's.
- It's a great service in Edinburgh. Keep it as it is.
- The continued issuing of PHC licenses is causing major problems in Edinburgh
- Disappointed that TX models seem to be dying out - they're the most accessible for me
- We need to limit the amount of taxis and private hire vehicles so as we can keep up the good standard of taxis we have and allow us a decent living wage
- few taxis at night. taxi drivers choosing not to work nights but complain about profits. taxi companies not answering calls and disabling online apps at night. safety risk for public walking home as no option except nightbuses

- In the last 2-3 years I used PHCs a few times and was shocked at how bad the driving was - cars drifting out of lanes, nearly hitting the car in front etc... I have a friend who briefly worked for a PHC company and it was clear there was insufficient work for all their drivers who thus tended to work very long hours. I went back to using black cabs even though they appeared more expensive. But then I noticed cab drivers using street knowledge could get me somewhere quicker than the sat-nav following PHC drivers, so the price difference was not as great as it first seemed.

When I've been in a cab with several other people the fare, once split per person, has seemed quite ok, but the same fare for a single passenger still feels a lot too much. I realise the driver's expenses are pretty much the same regardless of head-count, but maybe making solo trips cheaper and multi-passenger trips more expensive would help? I've mobility issues and generally use taxis, by myself, because I have to, not because I want to...

- I only use black cabs. I want to see more black cabs and fewer private hire taxis which I think would make taxi travel safer
- too much pollution from old tech machines
- Phasing out old diesel taxis in favour of electric would make a big difference to the air quality in Edinburgh.
- There should be a free trade. Economics will rule the level needed.
- Many taxis are selfishly, aggressively & badly driven, stop & turn in dangerous situations etc. It should be easier to report bad taxi driving & it should affect the issue of licenses.
- limiting the amount of phc on the road
- It is important so that a professional and adequate standards are met. Deregulation would mean a drop in taxi standards and the end to one of the best taxi fleets in the UK.
- The issues surrounding vehicle emissions in Edinburgh surely make allowing unlimited taxis in Edinburgh a non starter.

For the same reason as above, it's an absolute moral disgrace that 1700 phc cars have been allowed onto Edinburgh's streets.

There are not enough taxi drivers to drive the current amount of taxis and if we are ever to see £63000 electric taxis in Edinburgh, then we need all Edinburgh's taxis double shifted. Unlimited taxis could only result in single shifted taxis, and with earnings from a pie that's already been sliced into so many pieces with the introduction of a further 1000 phc this year. Result, no money for wages never mind electric taxis. End result, a city full of bucket taxis and phc polluting our air.

Look at how Edinburgh taxi fleet has aged since phc numbers increased to 1700. Proof of the pudding.

- Too many cars on the road as it is, great bus service, lots of taxis and even more private hire cars, lots of room on a tram, cycling and walking is easy in a small city as Edinburgh is
Putting even more taxis on the road would only add to congestion, air pollution and having more of them sitting idle. It would also make it harder for a taxi

driver to make a living and afford a new vehicle

- Due to the substantial increase in phc licences being granted, I feel there is less work out there already for the black cab trade. This in turn makes the designated black cab ranks harder to get on as they are regularly full up. As a result I find myself driving around more, burning more fuel which affects my fuel bills and is detrimental to the city centre pollution levels.
- Simply because there is not enough work to satisfy the current number of taxis and private hire, uber and even Rickshaws??? Taxi driving is full time job from which we need to earn enough through the whole week and whole year to keep our homes and families. A black cab is very expensive to buy, maintain and insure and overall earnings have dropped year on year in the last decade.

If there is unmet demand, this requires careful analysis as simply flooding the market with vehicles does not ensure that vehicles will be working where these odd spikes occur.....e.g.

Between 1 and 3 am may be busy on a Saturday night but unmet demand could be alleviated if customers are educated to book their return journeys. Essentially to expect 100% uplift with no queues is unrealistic, when did you last walk into a Council Office without a queue? And if there isn't one wouldn't you think that they were overstaffed?

- Simply there is not enough business to keep the number of black cabs, private hire vehicles, Uber, and even rickshaws on the road at present. A full time taxi driver requires work for the whole week all year round and cannot rely on just working the business "spikes" A taxi driver's family depend on regular work for an income it isn't a part time hobby. The costs of running maintaining and insuring custom built black cabs with trained licensed PVG checked drivers is rising all the time.
Any unmet demand must be carefully analysed, the market cannot simply be flooded because there are a few periods where it is felt that there are not enough taxis. An example would perhaps be where taxis are required between 1am and 3 am on a Saturday night.....perhaps the public need to be encouraged to think ahead and where possible be booking their return journey, the expectation that hundreds of taxis should queue on the off chance of one trip is frankly unrealistic. If one visits a Council Office regularly and there are never any queues, is this not indicative of overstaffing?
- As far as I know lots of people invested significant amount of money to own taxi
- Too many PHC clogging up the streets. Too many operating illegally. Plying for hire on official TAXI ranks. Illegal street pick ups. Speeding . Driving dangerously
- Operating a taxi in Edinburgh has never been tougher. The huge increase in PHV and the arrival of Uber has created a very unstable and unclear environment in which to own and run a black cab in Edinburgh. It is very difficult to find drivers to cover shifts for example. The cost of owning a new cab is basically at the point of being unaffordable with a new ETX5 costing 55k.

- I tried to view the survey on line but could not find or get the link. Being a taxi owner and full driver I know for a fact that the taxi numbers are ok at the present especially with all the private hire vehicles and uber cars on the streets. The taxi owners at present are unsure about the trade and are holding onto their vehicles for longer than they used to and is lowering the standard of cab out on the streets. We have had quite a bad year this year and lot of talk of drivers leaving the trade because the money has not been there to be made. I hope this helps you
- As a driver and owner for 31 years the trade has changed dramatically in recent years with private hire and now uber making it so much harder to make a living . It is very difficult to get on the ranks and the Waverley ranks are a joke , where any extra taxis would find to rank is beyond me . One final thought , I am glad I am nearer retirement age than starting again as I feel the increasing numbers of private hire (uber) is reaching saturation point where everybody black cabs and private hire will suffer big time.
- There are still long queue for taxi during busy hours in town...
- I am unable to find the survey's findings on the council web site.
I would draw to your attention the shortage of taxi drivers. more are leaving the trade for better job prospects elsewhere and retiring, than are joining the trade. A wholly inadequate enforcement of the illegal picking up (plying for hire) of PHCs and a failure by the council to bring in the promised improvements to the standard required of applicants for PHC driver licenses means that it is not worthwhile, the cost and effort studying for the Knowledge to become a taxi driver.
All you need to do is get a PHC license and Seagull the streets.
It would not have the nickname Seagulling if it was not a prolific practice.
Any time a PHC driver attacks a passenger the newspapers and TV refer to it as a Taxi Driver incident. This is offensive to taxi drivers who have studied hard to win their license.
- The work has been diluted due to the amount of phc applications in recent times. We do not need more taxis on the road however we do need more drivers covering the shifts. Too many taxis are parked up at the side of the road due to the number of qualified taxi drivers dwindling. A significant factor is the ease with which a phc licence can be obtained and potential drivers are willing to settle for phc licence as the barriers to entry are so much lower.
- The rapid rise in PHC has greatly affected taxis earning potential and subsequently the number of drivers looking to become taxi drivers. Taxis are not working as often as they could be because of a lack of qualified drivers

- As a Edinburgh taxi license holder for 15 years I strongly agree with a limit on the number of taxis in Edinburgh, in my opinion there's too many, I used to own my own cab and plate but sold out as I couldn't afford to run the taxi as there was not enough "work" for me, I now work night shift Sunday-Thursday and I spend a lot of time sitting on ranks but when it comes to 3am closing time I've got to compete with private hire cars sitting in taxi ranks waiting for so called pre booked jobs, and when we complain about this nothing gets done. The council should be looking to limit the number of private hire licenses issued and police them better. I.e when a p/hire car picks up a outside a club etc nobody checks to see if they are genuinely booked, therefore uninsured and putting public at risk and as for them driving in green ways or driving through bus/taxi/cycle lanes is incredible, the majority of private hire drivers believe they are taxi drivers and flout the law. It's about time the council and police step in and do something to help the taxi drivers as we feel we are constantly undermined, as for unmet demand surveys what a joke that is, this is our livelihood and needs protected. One thing that needs looked at is private hire advertising, radio, tv, advert etc the word TAXI is always listed there, why? Anyway this is my rant over now and I'll go work in my taxi tonight and make sure the public and myself are getting home safely, that's when I've dodged umpteen private hire cars coming out cow gate and grassmarket entrances which are closed 10pm-5am or share a lane with private hire on princes st. Just a normal night though and nothing will get done.
- As a Council I think we need to do something to restrict/ prevent the spread of Uber. Anecdotally, I've heard some pretty scary stories about Uber charges.
- More taxis more pollution

- Deregulation has been tried and failed already in Edinburgh. After detailed consultation with the Trade and CEC the current method of Incorporation was adopted whereby the Taxi Licences were allowed to be transferred to a Company or Partnership basis. This system was developed by the CEC Solicitors and the Taxi Operators at the time were given the choice to change their Taxi Licence. This would allow them to transfer their business at a future date. CEC charged a fee, as I recall, of £1000 for this transfer and it was deemed that this system would meet all legal challenges and allow for a future vibrant Trade based on restricted numbers and regular surveys of unmet demand.

Not enough has been noted about the price differential between the cost of Taxis and PHC vehicles. The very large difference in price cannot be ignored and unless this is addressed it will inevitably cause even more problems in the future.

The shortage of Taxi Drivers is now acute. I have been driving Taxis for nearly 40 years and have never seen a shortage like this. I note the comments regarding the Taxi test but I believe there should be an in depth investigation into who is running this and how they are managing this very important task. I have spoken to a number of potential drivers who have failed the test but achieved a mark in excess of 80%. There is not a University degree requiring this level of pass mark. Investigation of the numbers sitting, passing, repeat sittings, and failures should be analysed and reported to the Trade. Joint discussions should proceed as soon as possible with a remit to address these failings. Having discussed this issue with potential Taxi Drivers I feel there has been a major change to the way this system is operated. Candidates should be advised of the questions they have failed and the answer they gave in order to assist in their education. It does seem like the test papers have some incorrect answers and the candidates have no means of contesting their results.

I note the amount of drivers excused from wheelchair pickups and the apparent age restriction of 65 which must be a factor in this number increasing. There does seem to be an real shortage of younger drivers between the ages of 25 and 50. Vacancies are being advertised every shift and it is alarming to note that these vacancies are not being filled.

Quite a number of years ago I assisted with Driver Placement and gave a talk at the Cab Office, Murrayburn Road, to all new Taxi Drivers as they were being issued with their new taxi driving licence. The numbers of new drivers, both full and part time, was very considerably higher than it is today. Why have these numbers decreased so much?

- I find there are too many private hire cabs in Edinburgh and the standard of driving is poor. Also it seems that due to variable pricing of online services people are using cars instead of public transport adding to congestion. Private hire prices should be fixed/metered.

- I think there are adequate black taxis but too many private hire and worse still, Uber's in this city
There needs to be clearer distinction between black taxis and private hires and what the differences are.
I find it astonishing the standard expected for black taxis but the standard of the vehicles and often understanding of basic English in basic private hire deplorable. Standards are too low.