

CITY OF EDINBURGH COUNCIL

Item No 3

REGULATORY COMMITTEE

17 May 2021

DEPUTATION REQUESTS

Subject	Deputation
3.1 In relation to Item 7.1 on the agenda – Age Limitation and Emissions Standards for Taxis and Private Hire Cars – Annual Update	City Cabs (written submission attached)
3.2 In relation to Item 7.1 on the agenda – Age Limitation and Emissions Standards for Taxis and Private Hire Cars – Annual Update	Edinburgh City Private Hire Ltd and Seven Sevens Cars Ltd
3.3 In relation to Item 9.1 on the agenda – Motion by Councillor Barrie – Street Occupation, Trading, Licenses and Permits (submitted late)	Mercat Tours (written submission attached)

From: Les McVay
Sent: 12 May 2021 12:52
Subject: Euro 6 Retrofit Application

Hi Cathy,

In reply to your email dated 4th May.

City Cabs would sincerely like to thank you and the other Regulatory Committee members for your efforts in assisting our trade during the period of the COVID pandemic. The changes and amendments implemented by the Council since the introduction of the Age and Emission policy on 7th May 2018 have allowed many taxi licence holders to continue to operate throughout the last fifteen months.

As I have stated previously, over the last couple of years, our trade has been hit by a triple whammy of unregulated growth of PHC licences, the not-insignificant refinancing of our business needed to meet the new emission levels and, for the last fifteen months, the disappearance of our earnings due to COVID19.

The help we have received from the City of Edinburgh Council has been very much appreciated.

I am led to believe that there are currently just under one hundred taxi licence-holders in Edinburgh who have benefitted from the LPG conversion. The availability of LPG fuel suppliers remains a concern. Enquiries and representations to potential LG suppliers are ongoing to try and resolve this issue.

This alternative low-emission vehicle conversion has been viewed as an overall success by the many licensed operators who opted for it. Many of these licence holders are in their senior years and did not wish to be burdened by the £40,000 -- £50,000 of financial obligations they would incur as they approach retirement. The few extra years of earnings that this LPG conversion has afforded them and the available grants they took advantage of have worked out well for them.

The retrofit upgrade that the trade is now asking the Regulatory Committee to consider is also a credible alternative. The retrofit option is fully backed by Transport Scotland, which offers a grant of 80% of the cost of each conversion through the Energy Savings Trust.

We recognise that this proposal needs to be thoroughly analysed before approval by the Regulatory Committee, but this is a product that is already fully approved under the Energy Saving Trust CVRAS accreditation (Clean Vehicle Retrofit Approval Scheme).

The link to the main page can be found here:

<https://energysavingtrust.org.uk/service/clean-vehicle-retrofit-accreditation-scheme/>

The whole process has been rigorously tested and approved by the Millbrook Government testing centre.

<https://www.millbrook.co.uk/>

In your last email, you mentioned that the retrofit device has to be fully maintained to be effective and that the Committee had already made a policy decision that such devices are not suitable.

Apart from its normal, regular, required maintenance, the only additional requirement of this device is that it also periodically needs to be topped up with the additive AdBlue.

This is no different from all other Euro 6 vehicles. I am not aware of any other required maintenance, nor are the engineers currently involved in this retrofit process.

Could you please advise me of what maintenance you or your Officers are referring to?

We both seem to be receiving conflicting or confusing information regarding the route taken by Glasgow City Council on this matter.

You state that Glasgow CC have NOT given permission for this retrofit to go ahead and, like the Regulatory Committee, are considering the benefits of this conversion.

The information City Cabs have received from our colleagues in Glasgow is that there are already vehicles on the road in Glasgow with this retrofit successfully fitted.

I have today checked this with my colleagues in Glasgow, and Euro 5 taxis are currently being upgraded to meet all Euro 6 emission requirements through this scheme. Five have been carried out as of 11th May 2021.

These fully approved modifications are being carried out at Kerbside Auto.

<http://www.kerbsideautos.co.uk/>

I also have to emphasise that this retrofit system has been robustly evidenced, to such an extent that it has been widely introduced to the Bus and Commercial vehicle sector throughout Scotland.

It has also been rigorously tested at a Government Transport facility (Millbrook) and has been given the full support of Transport Scotland.

Please see the link below:

<https://www.intelligenttransport.com/transport-news/106235/9-75-million-awarded-to-retrofit-cleaner-exhausts-for-scotlands-buses/>

Our request is in no way intended to dilute the current Council's policy on climate change and low emissions. We are only asking that the Edinburgh Taxi Trade be given the same consideration and opportunities that have recently been afforded to other services in Edinburgh and other cities.

One final consideration that might encourage the Committee to look favourably on this request is the recent announcement by Mercedes Benz of its intention to launch a new "Electric Taxi" vehicle with a range of 250 miles. See below:

[New Mercedes-Benz eVito Tourer ALL ELECTRIC eVito Tourer Select L3 FWD \(100kw\) Offers | Western Commercial | Edinburgh | Glasgow | Bellshill \(easternwestern.co.uk\)](#)

[The New Mercedes-Benz e-Vito Tourer - Mercedes-Benz Commercial Scotland](#)

Sustainable. Ideal for taxi services, airport drop-offs or even longer journeys, the eVito Tourer has an impressive 245 mile combined WLTP range[^], DC rapid charging – which boosts battery life from 10-

80% in just 40 minutes* and comes with a 8-year/160,000km battery guarantee, keeping your customers moving both today and well into tomorrow.

www.easternwestern.co.uk

This range is a possible game changer for our trade, and, although it is not available at the moment as an approved Taxi in Edinburgh, it is anticipated that it could be fully compliant in two to three years.

This would fall into line with Edinburgh's zero-emissions policy and could be a natural transfer from our current Euro6 vehicles.

As we emerge from the pandemic, our trade, like many others, faces an uncertain future due to various factors, one of which is how to finance our vehicles in the short term. Due to the uncertainty of how our trade will go forward, lending institutions are now drawing back from financing any new taxi ventures. However, as we move out of lockdown, we hope that the confidence to lend to our trade will be restored pretty quickly.

Allowing this retrofit upgrade, which is fully Euro6 compliant, would greatly help many of our current licensed operators in the City by giving them time to get back on their feet financially as well as continuing to move towards the ultimate objective of a zero-emissions service by 2030.

Kindest Regards

Les McVay

Company Secretary

1 Atholl Place, Edinburgh, EH3 8HP



Context

Mercat Tours Ltd is a private family business which has operated history walks and ghost tours since 1985.

Our business aligns with the Council's strategic agenda for Edinburgh's growth;

- **Fair work;** Living Wage employer with profit-share structure
- **Fair city;** Gold award Green Tourism Business promoting ethical supply chain
- **Net zero city;** walking tours are a low carbon experience
- **Health & wellbeing;** walking tour promoting active lifestyle

Annual Economic Impact (based on 2019);

- Rate payer for 2 city centre properties
- Living Wage employer of 76 staff
- Local economy purchases: (95% Scottish supply base) = £1m +
- Local living wage for better jobs = £1m +
- CEC taxes and fees = £10k
- Taxes going to the Scottish Government = £114k

Barriers;

- Street Trader's License;
 - Not compulsory for all companies.
 - Creates very low cost to market entry without
 - No regulation of quality, health or safety
 - Fees charged for period Nov – April where trading was prohibited. No refund or extension offered.
- No on-street advertising;
 - All advertising structures were removed in 2017 to promote 'accessibility' and Health & Safety
- Inconsistent waiving/extension of permits to apply only to hospitality businesses with 'tables & chairs'

Solutions;

- Short term;
 - Waive all license and permit fees
 - Allow onstreet advertising with guidelines on application and use
- Long term;
 - Mandatory registration for walking tour companies using existing licensing mechanism to raise cost of entry and ensure Health & Safety of residents, staff and visitors;
 - Maximum numbers
 - Public liability insurance
 - First Aid training
 - VisitScotland Quality Assurance rating

Outcomes;

- Create/support sustainable jobs
- Support recovery of local economy
- Drive up standards of experience
- Protect local landmarks by managing foot traffic
- Avoid dangerous behaviour blocking pedestrian highway
- Raise revenue for Council