

**CITY OF EDINBURGH COUNCIL**

**Item No 3**

**REGULATORY COMMITTEE**

**21 NOVEMBER 2022**

**DEPUTATION REQUESTS**

<b>Subject</b>	<b>Deputation</b>
<b>3.1</b> In relation to Item 7.1 on the agenda - Assessment of Overprovision of Private Hire Cars within the City of Edinburgh	Edinburgh City Private Hire and Sevenses Cars

**Deputation to Regulatory Committee Item 7.1 PHC  
Overprovision Report.**

Thank you, Convenor and Committee, for allowing my Deputation today.

Item 7.1 refers to the Overprovision Report on Licensed PHC Vehicles in Edinburgh conducted by Jacobs. Normally my Deputation to this committee would be in relation to objections to a Report, today however I am not here to object to this Report from Jacobs, more I am here to ask the Committee to reflect on some points, and suggestions I would like to make on the reporting for the future, and to the recommendations made by Jacobs for the ongoing survey situation.

The fact that the findings from Jacobs on this Report are very much reflective of the current aftermath of the Covid Pandemic cannot be underestimated, and I think we can all agree that the probability of even having this Report would have been nil if this had been decided after the Pandemic started. Obviously, the results contained within the Report are very much reflective of the decimation the Trade suffered at the hands of the Pandemic.

We have no objection to the overall findings and the summary that no overprovision of PHC Vehicles exists currently. However, we would like to point out a few things that perhaps the Committee could consider when it comes to other areas contained within the recommendations from Jacobs, and suggestions that could perhaps allow for a more cost-effective solution to the reporting and surveys of demand for both the PHC and Hackney sectors of the trade in future.

Our first point is with reference to the overall reporting on both the PHC provision and the Hackney provision. It seems appropriate that there should be one report on both sectors of the Trade with specific areas of specialty being looked at per licensed vehicle type.

In essence, currently in Edinburgh you have pre-booked hire work and street work. Pre-booked hire work is traditionally looked at as the PHC sector, and street work (ranks, stances and hailing in the street) as Hackney work. However, with the rise in apps and consumer changes to the way in which both Hackney Taxis and PHC vehicles are used, this has become more of a mixed bag and the majority of consumer usage is by way of pre-booked hires for both sectors. This will only increase over the next few years as consumers become more and more discerning and want hired vehicles to come and pick them up at their location rather than wandering about and looking to flag down. With that trend in mind, it is imperative that when looking specifically at overprovision within the PHC sector we must look at the “pre-booked hire bookings” made by consumers, regardless of which sector of the trade that the consumer uses to book.

The PHC sector can only be pre-booked and therefore 100% of the work within the sector is of that type. However, the pre-booked hire customer is also within the hackney sector, and that is fine, but if we are looking at pre-booked hires as Private Hire work, we must look at the entire pre-booked hire marketplace, regardless of the vehicle type being booked. A perfect example of this consumer behavior is around busy nights at the weekend, Edinburgh festival time, rugby internationals and other major events. At this point the PHC sector does not change, customers still book as normal, however when the streets are busy there is more work available to the hackney sector

from the street, this in turn means less availability for pre-booked hires within that sector. The result is more than normal numbers turn to PHC booking offices for a service, in other words greater demand for services when the streets are busy.

In our opinion it is imperative when looking at the pre-booked hire sector we must have data from ALL pre-booked hire operators, regardless of licensed vehicle type.

I must add at this time that there has been a degree of empathy from within the PHC sector in this regard, and a lack of engagement with both Licensing and Jacobs in order to gain the relevant data required, and we take some responsibility for that.

We also feel that there are many relevant factors that would be available from this Booking Office Licence holder's data driven policy. Examples of that are Full-time and Part Time driving, the data available could determine hours worked and give a far more accurate data stream to enable more informed decisions. Differences between those drivers who are not on any booking system but hold licenses to cover contract and council schoolwork only, the entire trade is not out there covering bookings from the public all the time. The toolkit of data available to help make these informed decisions could also include Licensed Vehicle mileage data. Vehicles are tested annually, and mileages are taken regarding MOT data, this data is readily available and would be an extremely useful tool in determining if there have been increases or decreases overall and therefore determining an indicator of supply and demand.

To that end it is our assertion that data driven decision making must form part of the surveys of demand on both sectors, and therefore we would request that it become mandatory that all licensed booking office holders should disclose the relevant information to Licensing for

use in the reporting mechanisms for these surveys. We know that this information is important in making data driven decisions rather than opinions, and that some of this information may be commercially sensitive, but if we use the relevant data in numerical terms and not names address etc, there are no confidentiality issues. Booked vehicles, late bookings, cancelled bookings, customer no shows, number of vehicles working at different times and days, all this data is required to give a relevant picture of the state of the market at any given time. A voluntary approach may work, but given the current response in this Report, we feel that the data must be provided by all involved in the pre-booked sector. We understand this would require a small change to the local Booking Office License conditions, but in our opinion, why should that not be a requirement for those taking bookings in Edinburgh. It can only be in everyone's interests that we have better data driven decisions taken for the future of our collective Trade's.

It is an extremely interesting time within the Trade, and within Edinburgh in general. We are in a climate crisis and the Council has many policy commitments in relation to climate and emissions. The LEZ proposals, George Street and First New Town policies, Net Zero on a national level. At a time when these policies are at the forefront of the members' thinking we should also take cognizance of the fact both PHC and Hackney vehicles form a major part of the Public Transport provision now and in the future of Edinburgh. At a time when the emphasis from Councils around the country is to get citizens away from car use and more active and public transport use it is important that the role of both PHC and Hackney vehicles in helping to achieve that end should be utilized in an informed fashion. Our proposals will give the Council the benefit of a data driven policy that feeds into the Public Transport infrastructure in helping us all to get car use down, and PHC and Hackney Taxi being a transport of choice for the general public

alongside walking, cycling and Bus transportation. We as a Trade welcome the opportunity to be a major part of the infrastructure, you can already see some of the changes being made in electric and hybrid vehicles with more to follow, more choice on those types of vehicles, and not less should be the way forward, our data driven policy change will go a long way to achieving that ambition, and it costs nothing as the data already exists.

In respect of cost effectiveness, we feel that there are so many similarities given the pre-booked status of both sectors that one report covering both sectors of the trade, albeit with consideration taken of rank and street work etc, should be the way forward. The financial consideration given to this report by Jacobs with a budget assessment of £50,000, and presumably similar for the unmet demand survey, we feel a singular report will have substantial savings. We would welcome the opportunity to discuss this with officials and committee members to pursue this opportunity further.

An additional point on this specifically refers to the point made by Jacobs that this Report should be addressed again in 12 months' time, however the unmet demand assessment should be looked at again in 3 years' time. Given our suggestion of one overall report then this may be looked at differently, and obviously financial consideration would also apply if we looked again in 12 months at a similar cost. Again, this is something we would welcome the opportunity to discuss in more detail before a final decision on time scales is taken.

Edinburgh Council has always been seen as one of the leading Councils in the country in the Licensing Arena, we have been at the forefront of

much of the Regulatory changes over the years, our proposal offers the Council the opportunity to once again set the standard in reporting of Licensing policy, setting a gold standard on this and other areas of Licensing with data that is already there and readily available at no real cost to the Council represents exactly that golden opportunity that should be grasped with both hands, setting the standards that other LA's would surely follow.

I could go into other aspects of this report and Items 7.2 and 8.2, both of which have relevance to the PHC and hackney trade. However, given the shortage of time and other very important items on this Agenda with regards to Prevention of Drug Deaths, I thank the committee for its time today, and request that perhaps we can have a more in-depth discussion on the format and timing of any future reports with officials and with Members at their convenience. I am happy to answer any questions that the members may have.