

The Highland Licensing Committee

Meeting - 1 April 2014

Agenda Item	6
Report No	HLC/016/14

Review of Taxi Tariff 2014

Report by the Legal Manager

Summary

This report provides the Committee with details of the responses received following public advertisement of the proposed revised scale of the maximum fares that can be charged by taxis and private hire cars fitted with taxi meters.

1.0 Background

1.1 At the meeting of the Highland Licensing Committee held on 4 February 2014, Members undertook a review of the current scale of maximum fares and charges for taxis and private hire cars fitted with taxi meters. The Committee agreed the following draft changes to the tariff:

- Increase the cost of the initial yardages for Tariffs 1, 2 and 3 by 30p. The effect of this would be a 30p increase on all fares regardless of the distance travelled.
- The charge applied to compensate for the cost of the outward journey for hires which commence 3 miles or more away from the taxi or taxi base (whichever is the nearer) and where the customer wishes to travel further to be increased from a maximum of £6.50 to a maximum of £7.50.

1.2 A copy of the current tariff is attached as Appendix 1 of the report.

1.3 A copy of the proposed tariff as agreed by the Committee on 4 February 2014 is attached as Appendix 2.

1.4 In accordance with the Civic Government (Scotland) Act 1982, the proposed scale was advertised with responses requested to be submitted to the Council by 11 March 2014.

2.0 Representations received

2.1 A total of 3 responses have been received from:

- Lochaber taxi operators/drivers
- Mr Chris Campbell
- Inverness Taxi Alliance

2.2 A copy of the responses are attached in Appendix 3.

3.0 Further Information

- 3.1 Appendix 4 attached details the average cost per litre of unleaded petrol and diesel throughout the Highland Area, as detailed on the website www.petrolprices.com.
- 3.2 Appendix 5 details the cost of fares for other Scottish Local Authorities and provides a comparison with Highland.
- 3.3 Appendix 6 details the effect of the tariff proposed by the Inverness Taxi Alliance which was circulated with the report to the last Committee meeting in February 2014.
- 3.4 Members will be aware that the taxi tariff only sets a maximum fare structure. Operators are entitled to charge any fare, provided it does not exceed the maximum provided for in the tariff.
- 3.5 The Council when fixing the tariff is exercising a balancing function between the legitimate expectations of taxi operators to earn sufficient income to make a living and the public expectation to be able to hire a taxi of reasonable quality at a reasonable cost.

4.0 Implementation

- 4.1 The next step in this process will be for the Committee to consider the representations received and thereafter agree a final tariff. In accordance with the Act, a letter will be sent to the Taxi Operators advising them of the outcome and of their right of Appeal to the Traffic Commissioners within 14 days of the date of the meeting. If no appeal is lodged an advert will be inserted in a local paper informing the public of the new tariff and its commencement date.
- 4.2 Should an appeal be submitted to the Traffic Commissioner this will have the effect of suspending the decision of the Council and the tariff will effectively be on hold, with the original tariff remaining in operation meantime.

5.0 Implementation Date

- 5.1 As previously intimated the proposed implementation date would be 26 May 2014. This is to ensure that the advert which requires to be placed in the press (at least 7 days prior to the tariff coming into effect) can be done following confirmation of no Appeal (if this is the case). It will also afford the taxi operators time in which to arrange for their meters to be recalibrated, if required.

6.0 Recommendation

6.1 The Committee are invited to:

- (i) consider the representations received following advertisement of the proposed tariff and thereafter agree a final tariff
- (ii) note that any revised tariff will take effect from 26 May 2014, subject of any appeal being lodged as per 4.1 of the report.

Designation: Legal Manager (Regulatory Services)

Date: 17 March 2014

Author/Reference: Michael Elsey: 12/2/5

Appendix 1: Copy of current tariff.

Appendix 2: Copy of proposed tariff as agreed by HLC on 4th February 2014.

Appendix 3: Copy of representations received.

Appendix 4: Details of average cost of fuel in Highland

Appendix 5: Details of fares for other Scottish Local Authorities

Appendix 6: Note of proposed effect on existing tariff

THE HIGHLAND COUNCIL

TAXI FARES

With effect from midnight 21st January 2013, the maximum fares will be as follows:-

Tariff 1:

- For the first 785 yards or part £2.50
- For each additional 130 yards or part .10p

General effect – the price of a hire £3.30 for the first mile plus £1.40p per mile thereafter plus extras*

Tariff 2: applies on Good Friday, Easter Monday and May Day and between **9.00pm and 7.00am on any day**, all day on Saturday and Sunday **and when 5 or more** passengers are being carried **at any time** of any day or night, for example, by a "London" style taxi or by a "people carrier" or by a minibus, except where Tariff 3 applies.

- For the first 560 yards or part £3.00
- For each additional 92 yards or part .10p

General effect – the price of a hire: £4.40 for the first mile plus £1.90 per mile thereafter plus extras*

Tariff 3: applies on Christmas Day, Boxing Day, New Years Day and 2nd January. It also applies when 5 or more passengers are being carried between **9.00pm and 7.00am**, all day on Saturday and Sunday and on Good Friday, Easter Monday and May Day for example, by a "London" style taxi or by a "people carrier" or by a minibus.

- For the first 444 yards or part £3.60
- For each additional 74 yards or part .10p

General effect – the price of a hire: £5.40 for the first mile plus £2.40 per mile thereafter plus extras*

*Extra Charges

- Waiting time for first 2 minutes 10p
- For each additional period of 20 seconds or part thereafter 10p
- Booking ahead e.g. by telephone 50p
- Any bridge tolls or ferry charges, where applicable.

In addition, provision has been made for a supplementary booking charge of up to a maximum of £6.50 to compensate for the cost of the outward journey for hires which commence 3 miles or more away from the taxi or taxi base (whichever is the nearer) and the customer wishes to travel further away. This charge may only be demanded if the customer is informed of the amount of the charge at the time of booking.

When a taxi (or a private hire car fitted with a taxi meter) is called but not used, a charge shall be allowed as if it had been occupied from the time it left the stance or garage.

Soiling Charge – maximum of £60.00, payable by an offending passenger, where a vehicle requires to be removed from service for cleaning in order for it to be restored to a usable state and condition.

The fare demanded for the hire of a taxi (or a private hire car fitted with a taximeter) for a journey within the Council area must be no more than an amount according to the Council tariff which applies when the journey begins and should include any extra charges incurred.

IF YOU HAVE ANY COMMENTS OR COMPLAINTS ABOUT THIS TAXI OR THE DRIVER PLEASE CALL **THE HIGHLAND COUNCIL** ON

0845 600 4 222 CALLS WILL BE CHARGED AT A LOCAL-CALL RATE

THE HIGHLAND COUNCIL

TAXI FARES

In accordance with the requirements of the Civic Government (Scotland) Act 1982, the Highland Council is reviewing the maximum level of charges for the hire of Taxis or Private Hire Cars fitted with Taxi Meters.

It is proposed that with effect from midnight on 26th May 2014, the maximum fares will be as follows:-

Tariff 1;

- For the first 785 yards or part £ 2.80
- For each additional 130 yards or part .10p

General effect – the price of a hire £3.60 for the first mile plus £1.40p per mile thereafter plus extras*

Tariff 2; applies on Good Friday, Easter Monday and May Day and between **9.00pm and 7.00 a.m. on any day**, all day on Saturday and Sunday **and when 5 or more** passengers are being carried **at any time** of any day or night, for example, by a “London” style taxi or by a “people carrier” or by a minibus, except where Tariff 3 applies.

- For the first 560 yards or part £ 3.30
- For each additional 92 yards or part £ .10p

General effect – the price of a hire £4.70 for the first mile plus £1.90 per mile thereafter plus extras*

Tariff 3; applies on Christmas Day, Boxing Day, New Years Day and 2nd January. It also applies when 5 or more passengers are being carried between **9.00pm and 7.00am**, all day on Saturday and Sunday and on Good Friday, Easter Monday and May Day for example, by a “London” style taxi or by a “people carrier” or by a minibus.

- For the first 444 yards or part £ 3.90
- For each additional 74 yards or part .10p

General effect – the price of a hire £5.70 for the first mile plus £2.40 per mile thereafter plus extras*

*Extra Charges

- Waiting time for first 2 minutes .10p
- For each additional period of 20 seconds or part thereafter .10p
- Booking ahead e.g. by telephone .50p
- Any bridge tolls or ferry charges, where applicable.

In addition, provision has been made for a supplementary booking charge of up to a maximum of £7.50 to compensate for the cost of the outward journey for hires which commence 3 miles or more away from the taxi or taxi base (whichever is the nearer) and the customer wishes to travel further away. This charge may only be demanded if the customer is informed of the amount of the charge at the time of booking.

When a taxi (or a private hire car fitted with a taxi meter) is called but not used, a charge shall be allowed as if it had been occupied from the time it left the stance or garage.

Soiling Charge – maximum of £60.00 payable by an offending passenger, where a vehicle requires to be removed from service for cleaning in order for it to be restored to a usable state and condition.

Michael Elsey

From:
Sent: 18 February 2014 13:26
To: Licensing
Subject: re Objection to Lochaber Tariff Increases

Hello

We wish to lodge an objection to the increases being proposed for the taxi fares. I am speaking on behalf of the driver/operators listed below. We as Taxi driver/operators in Lochaber feel that an increase however small at this time is not in anyone's interest. We are very quiet and struggling to get customers in our cars as it is just now, before an increase is made to the main flag plus the cost of getting our meters changed £88.68 per car £30 to the meter calibrators and £58.68 to the council (pre 1st of April price increase) these price increases may be alright for a city like Inverness but not for rural Taxis which should be licensed separately.

We have read in the Press and Journal that the drivers wanted an increase of 50p to the flag! We the drivers listed below in Lochaber were not consulted and do not want any increase. I am not speaking for all the taxi drivers/operators in Lochaber just the ones I have had a chance to meet and ask to sign our petition,

George MacDougall

Thomas Blyth

Manuel Costa's

Dion Gibb

Ronnie Wilson

George Band

D Stewart

Ron Cameron

Colin MacLean

David ballantyne

Gordon Ballantyne

David Mitchell

D MacLeod

Karyl Thomson

John Keane

David King

Jim McCourt

Hugh Hutton

John Cowie

Nairn McArthur

William Clark

Bob Tait

J MacDonald

Peter Macintyre

Jusef Ahmed

Al MacDonald

James Blackburn

James Milne

T MacCartney

Jim Rennie

Mary Bush

Thomas Kane

Raymond Munro

Jason Diegunio

Peter MacLean

Donald MacLean

Victor King

Cameron Stewart

Colin D

E MacDonald

Innis Wood

Gordon Clark

Pedro Narvaez

Licensing

From:
Sent: 08 March 2014 17:41
To: Licensing
Subject: Regarding taxi fares

I think the price of taxis in Inverness is behind the times. Far too cheap.

I got a taxi from Aberdeen to Inverness last Friday, it cost exactly £217.20 tariff 2.

I was surprised because 2 weeks before I did the exact same journey, setting off from Inverness to Aberdeen with similar traffic and on tariff 2 again - it only cost me £180.

It's no wonder cabbies are complaining about being skint, they are earning less than minimum wage once costs are factored.

I think an increase would be welcomed by the majority of struggling drivers.

Chris Campbell

Sent from my iPhone

INVERNESS TAXI ALLIANCE

Representation of tariff review proposal

Inverness Taxi Alliance taxi tariff review:
Representation of proposal for 2014

Prepared by Helena Macleod, Secretary and Treasurer

9th March 2014

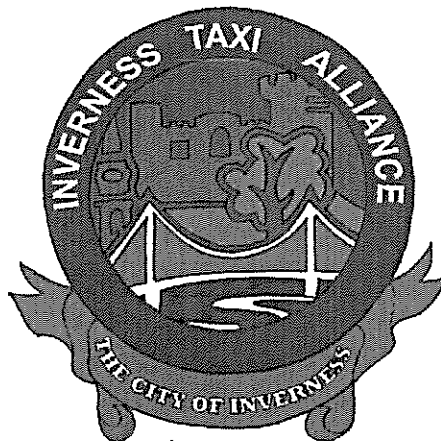


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Inverness Taxi Alliance

Representation of the tariff review proposal 2014

1.0 Introduction

The Inverness Taxi Alliance would like to thank the Highland Licensing Committee for their consideration of the proposals submitted by the Trade and the draft amendments to the taxi tariff in Highland as set out in their letter dated 10th February 2014.

A meeting of the Inverness Taxi Alliance was held on 25th February to provide a consultation forum for members to discuss the outcome of the tariff review as contained in the draft amendments proposed by the Highland Licensing Committee.

The meeting was well attended from a cross section of drivers representing the main taxi companies and independent taxi drivers, all of whom wished their views to be fairly represented.

The main purpose of the meeting was as follows:

- To gather the opinion of all the members present towards the Highland Licensing Committee draft amendments of 10th February made in response to the Trade tariff proposal for 2014-2016 submitted by Inverness Taxi Alliance
- To decide what action, if any, the Alliance members wish to pursue on behalf of the wider Trade, either in the form of an acceptance of the terms contained within the HLC draft amendments, or in the form of an representation against said draft amendments to be submitted by 11th March 2014
- To evaluate the original proposal submitted by Inverness Taxis Alliance and determine the relative strengths and weaknesses of the case with the purpose of creating a more robust line of argument in favour of the proposal to create equilibrium with Perth & Kinross Council tariffs applied in May 2012 (almost 2 years ago)
- To request a formal consultation with the Chair of the Highland Licensing Committee, Councillor Maxine Smith, to discuss the subject matter and related issues identified in the original proposal document which were not addressed in the Council's draft amendments of 10th February

1.1 Decision to submit a representation by the Inverness Taxi Alliance

1. The committee approved a unanimous decision to submit a representation of the original Trade proposal to the Highland Licensing Committee in an attempt to present a more robust argument in favour of said proposal and oppose the draft amendments offering an increase of 30p to the initial flag for Tariffs 1, 2 and 3.
2. The committee also approved a unanimous decision to reject the increase of £1 added to the supplementary booking charge of up to a maximum of £6.50 to compensate for the cost of the outward journey for hires which commence 3 miles or more away from the taxi or taxi base.
3. The committee approved a significant majority decision to continue to pursue the original proposal submitted by the Inverness Taxi Alliance to align the current tariff scale with Perth & Kinross Council.

1.2 Original proposal: achieving equilibrium with Perth & Kinross Council tariff scales

The main driver to negotiate an increase of 50p to the initial flag falls in Tariff 1, 2 and 3, along with an *increase* in the yardage across all 3 tariffs flags and a *decrease* in the yardage for each additional mile, or part thereof, for tariffs 1 and 2, is to achieve equilibrium with the current Perth & Kinross tariff scale as detailed below:

1. **Tariff 1** – An increase of 50p from £2.50 to £3.00, while also incorporating a 95 yard increase from 785 to 880 yards in the initial flag, and a decrease of 20 yards from 130 to 110 yards for each additional 110 yards or part thereof
2. **Tariff 2** – An increase of 80p from £3.00 to £3.80, while also incorporating a 320 yard increase from 560 to 880 yards in the initial flag, and a decrease of 4 yards from 92 to 88 yards for each additional 88 yards or part thereof.
3. **Tariff 3** – An increase of 90p from £3.60 to £4.50, while also incorporating a 436 yard increase from 444 to 880 yards in the initial flag, with no change to the yardage of 74 yards for each additional mile or part thereof

1.2.1 Differences between Highland Council & Perth Kinross tariff 2 scales

There are, however, extenuating circumstances regarding the Tariff 2 rate that need to be considered along with this proposal as follows:

- The Tariff 2 rate at Perth & Kinross Council does not take effect until 23:00hrs and ends at 06:30hrs, unlike with the Highland Council scale, where the Tariff 2 rate takes effect at 21:00hrs and ends at 07:00hrs
- The Tariff 2 rate for Perth & Kinross does not apply on a normal Saturday of each week, unlike the Highland Council tariff 2 rate which applies from 21:00hrs on Friday evenings through to 07:00hrs on Monday mornings each weekend, apart from when tariff 3 applies for public holidays

In view of the fact that the purpose is to create equilibrium between the tariff scales with Perth & Kinross Council and the Highland Council, it is evident that the misalignment of the current application of tariff 2 scales produces an impediment to achieving this aim.

The Trade would therefore seek the advice and guidance of the Highland Licensing Committee in determining the best outcome to overcome this issue, thus ensuring the desired effect of equilibrium is achieved for both the Trade and in guaranteeing the fare-paying public receive a good quality of service at a reasonable cost.

This we believe can be achieved through a formal consultation process with the Highland Licensing Committee where the Council would engage with Trade as their appointed representatives to ensure the best interests of all parties concerned.

2.0 Formal consultation

The Code of Practice on Consultation (2008)¹ by HM Government states that 'formal consultation should take place at a stage when there is scope to influence the policy outcome' and this should form an important stage in the policymaking process.

As such, an effective and informed dialogue on the issues is sought through a formal consultation process with the Chair of the Highland Licensing Committee, Councillor Maxine Smith, to take place at a time, date and location mutually agreeable by the Highland Licensing Committee and the Inverness Taxi Alliance. It goes without saying that there is no point in the Licensing Committee consulting with the Trade unless their representatives are willing to provide the following conditions to establish effective dialogue and discussion throughout the process:

¹ HM Government (2008) *Code of Practice on Consultation* available online at <<http://www.berr.gov.uk/files/file47158.pdf>> Accessed 24 February 2014

- Be prepared to consult with the Trade in an open-minded, reasonable, transparent and impartial manner
- Provide a full justification for the reasons pertaining to the unacceptability of the original proposal and supporting case submitted by the Inverness Taxi Alliance
- Provide a full justification for the rationale that led to the decision making process reflected in the HLC draft amendments which proposes an increase of 30p for each flag fall and a £1 increase on the supplementary booking fee
- Provide a detailed response, or arrange for a further consultation, to discuss the additional supporting evidence contained in the representation which ratifies the original proposal by Inverness Taxi Alliance and which has not been addressed in the Licensing Committee's draft amendments of 10th February 2014

2.1 Responsiveness of the Trade to the consultation process

Sufficient evidence has been provided by the Inverness Taxi Alliance in their original proposal of 9th January to ensure that the preliminary analysis of the case to support equilibrium of Highland Council taxi tariff scales with Perth & Kinross Council was made available for local government and public scrutiny. Additional evidence is now contained within this representation so as to inform the development of the taxi tariff policy review and its subsequent implementation.

2.2 Clarity of scope and impact of the Trade proposal

The Inverness Taxi Alliance has been clear about the scope of their original proposal submitted on 9th January, wherein, a wide range of issues faced by the Trade were presented and a response to those issues was requested from, and on behalf of, the Highland Licensing Committee. The subject matter discussed highlighted where there is room to influence taxi tariff policy development and to build upon what has already been proposed in the Council's draft amendments.

2.2.1 Scope of proposal

The Trade has clearly demonstrated the source from where the information presented in their original proposal was obtained and how these credible references contribute to the evidence-base to provide additional justification of the subject matter. The references provided that were sourced from the Automobile Association, Perth & Kinross Council and the Highland Council substantiated the following data:

1. National statistical data comparisons for unleaded fuel & diesel costs and vehicle running costs which emphasised an increase in costs from last year
2. Comparisons of fuel prices based in the Highlands compared to the Scottish national average, which proved that fuel costs are more expensive in the Highlands
3. Comparisons of the cost of living between the Council Tax bands set by Perth & Kinross Council and the Highland Council, which confirmed that the cost of living is more expensive in the Highland Council area
4. Comparisons of the Taxi and PHC licence fee scales set by Perth & Kinross Council and the Highland Council, which verified that, as a licensing authority, the Highland Council charges considerably more for their licensing fees to the local Trade than those charged by Perth & Kinross Council
 - o The drivers have also considered the individual financial cost required to ensure the meter is reset by RM Brown (£23.50) and then recalibrated by Trading Standards (£58.68). The proposed increase of 30p per journey contained in the draft amendments would take a significant number of journeys over a lengthy period of time to offset these costs.
 - o Members of the Inverness Taxi Alliance suggest that an equilibrium of fee scales should be sought across Scottish Local Authorities to align with the comparative tariff scales of each authority so that the Highland Council Taxi and PHC licence payers do not face a significant increase in the variation of fee charges
5. An analysis of the average number of taxi journeys consumed by customers who live within the city of Inverness recognises that the majority of trips are of a short distance, ranging between 1½ to 1¾ miles. During these short journeys car engines use more fuel than normal to warm up and the exhaust catalyst is also less efficient when cold, therefore not so effective at reducing emissions
6. The last initial flag tariff increase for Tariff 1 took place seven years ago in September 2006 when it increased from £2.00 to £2.50. The last initial flag tariff increase for Tariff 2 took place in January 2007 when it increased from £2.50 to £3.00 and for Tariff 3 when it increased from £3.10 to £3.60

2.2.2 Impact of proposal

The underlying aim of the Inverness Taxi Alliance proposal is to support a fair and equitable tariff review outcome that will provide a reasonable standard of living for the Trade and also one that guarantees a reasonable standard of service at a reasonable cost to the fare paying public.

An Impact Assessment was duly considered at the time of drafting the original Trade proposal to ensure that an inclusive approach was adopted throughout the process to identify the impacts that would adversely affect disadvantaged groups of people who frequent taxi services.

Consideration of the relevant parties who might be disproportionately affected by an incremental increase to the taxi tariffs proposed by the Trade would include those who are in receipt of state benefits such as elderly passengers who receive OAP benefit and passengers with disabilities who receive the Disability Living Allowance or other incapacity benefits.

2.3 Responses to the consultation

Members of the Inverness Taxi Alliance respectfully request that all the responses, both written responses and those fed in through other channels, such as discussions held with the Trade by the Licensing Administration team, Traffic Wardens, Trading Standards Officers and members of the public, should be analysed carefully, using the expertise, relevant experience and views of above mentioned respondents to develop a more effective amendment to the current taxi tariff.

The Alliance would appreciate your diligent input to ensure that appropriate focus is given to the evidence and supporting argumentation provided by the Trade, and that any other consultation responses are examined primarily through a qualitative, rather than a quantitative, approach. It should be noted that the responses contained within this representation were discussed with a wide cross section of the Trade at the time of drafting the original proposal, paying particular attention to the public views and potential impact on other interested parties when expecting to hire a taxi of reasonable quality and cost.

2.4 Consultation with the Trade

Members of the Trade operate for long hours on a day-to-day basis to provide a professional, helpful and friendly service to the general public and to business customers. Drivers engage with customers from all forms of background, which in turn, places them in an advantageous position to accurately gauge the views and opinions of their customers. These same drivers recognise that it is in their best interests to provide a good quality of service at a reasonable cost and with the available resources, by acting upon customer feedback, thus ensuring that good relations are maintained between the Trade and the general public.

2.4.1 Local Authority consultation: example of best practice

The process of building and maintaining good relations between the general public and the Trade can be facilitated by the local licensing authority. An example of best practice is demonstrated through the consultation process adopted by Perth & Kinross Council, where, for some years, the Licensing authority has engaged in regular face-to-face communications with the Taxi Trade to develop a collaborative working partnership. The Council has created a discussion platform to enable members of the Trade to have their voice heard and to hopefully address their issues. The Annual Open Forum is therefore designed to gather views, opinions and feedback from the Trade and intended to inform effective strategies for Street Scape planning and forthcoming tariff reviews.

Present at the recent Open Forum are the Convenor of the Licensing Committee, the Legal Manager, Licensing Administrative Officer, the Enforcement Officer and any other personnel so requested to attend by the Trade, for example the Traffic Warden.

By engaging with members of the Trade in an environment of respect and cooperation, the recent outcome from the Perth & Kinross tariff review established that the Trade had '**no appetite**' for a tariff increase and were content to continue with the existing scales. The positive effect from a collaboration of this nature is that the Trade are satisfied that they have had their voice heard, they believe that after taking into consideration the costs of providing their service they are receiving a 'fair wage' and just as importantly to them, they are pleased that no additional cost is imposed on the customer.

2.4.2 Adopting best practice in the Highlands

Acting on behalf of the best interests of the Trade, the general public and the Highland Council, the Inverness Taxi Alliance wish to pursue a similar collaborative arrangement with the Licensing Committee in the hope of creating a more sustainable future and a better legacy for the Trade in the Highlands.

Evidence of poor decision making which was implemented throughout more recent tariff reviews has become more apparent over time in the changing trends and behaviours of customers. The Trade is all-too aware of the negative feedback regarding decisions which continue to remain unpopular among drivers and the general public, yet did not form part of a majority representative view from within the Trade.

Despite several appeals submitted to the Traffic Commissioner by individual taxi operators and taxi booking offices in protest to the last review in January 2013, the amendment to the

Tariff 2 rate was put into effect from 9pm, brought forward from 10pm. This amendment to the tariff scale did not yield any benefits to the vast majority of day time drivers, yet the amendment was nonetheless implemented to ensure the review did not exceed a period of 18 months since the previous process. As a result, there is a noticeable change in the number of people using taxis to come into the town during this period, thus affecting not only the taxi trade, but also the Liquor Licensing and hotel/restaurant trade.

Similarly, the implication of Tariff 2 rates on Saturdays has affected the behaviour of old age pensioners who would generally come into town to do their shopping at the weekend, but who have now changed to midweek days.

Through regular and effective communication with the Council, members of the Inverness Taxi Alliance wish to avoid any ill-informed future decision making either by the Trade or by the Council, and instead to endeavour to evaluate the bigger picture associated with consumer behaviour and the impact that any decision may have on changing trends. These communications would inform:

- The impact of future tariff increases
- The availability of sufficient and accessible taxi parking spaces
- Clear road markings to identify taxi rank spaces for use by the Trade only and intervention by enforcement officers for public offenders
- Illuminated signage for taxi stances

3.0 Additional issues affecting the Trade

The Trade feels strongly that their views have not been fairly addressed by those who are placed in the position of office to properly represent their interests. As such they would appreciate a formal process of democratic representation with the Council in particular to discuss potential solutions relating to the under-provision of rank spaces on the main taxi stances in Inverness. Previously these consultations/meetings took place between the Trade and the Licensing Committee in the Inverness Bunker.

3.1 Under-provision of taxi rank spaces

Currently and for some time now, issues that are being faced by the drivers primarily include the lack of rank spaces, along with the associated risks and problems with the following:

- Increased fuel consumption caused by the need to circle the inner city environs up to 7 times at busy periods before locating an available rank space

- Increased CO₂ emissions and pollution leading to the environmental degradation of historical buildings and unpleasant air-polluted conditions for pedestrians and shop keepers
- Increased traffic congestion in Union Street, Queensgate and Academy Street
- Frustration caused to drivers and to the traffic wardens

Specific problems relating to the latter point have are increasingly becoming more intensified as the number of taxi operators and PHC drivers increases within Inverness, leading to the following recent incidents and areas of concern:

- There is the threat of prosecution by Traffic Wardens if taxis turn right across Academy Street into Station Square. This situation has arisen due to the lack of rank spaces on Academy Street. Previously the Traffic Wardens would not prosecute if the vehicle undertaking a U-turn did not cause an obstruction to oncoming traffic or if the driver needed to face the vehicle in the other direction for a passenger on board
- On 18th February Traffic Wardens were asked by the Trade to take action on two illegally parked private cars parked in the taxi rank spaces on Queensgate to no avail, despite there being a lack of spaces for drivers to park
- Currently there are 27 rank spaces which is not a sufficient number to serve the needs of the Trade. A driver with the largest company in Inverness referred last week to this same number of taxis from his own company alone showing as 'cleared in town' on the datahead, regardless of all the other cleared drivers waiting around the town centre from other companies, independent operators and PHC drivers.
- Shane Manning has previously addressed the issue of the lack of rank spaces and proposed the creation of 6 ranks spaces by potentially constructing a 'cut-out' from the entrance to Station Square down to the entrance of Sports Direct. This would be possible at Rohan where the Council could 'shrink the island' from a double to single
- Furthermore, the height of the curb at the front of the Filling Station in rank position 1 is approx. 4" - 5" and poses a health and safety risk to the elderly, infirm & disabled people in wheelchairs. The excessive height also knocks against the bottom of taxi doors. This was brought to the attention of Morrison Construction during the building phase of Eastgate 2
- The 5th space on the Filling Station rank is not safe to operate from and carry out the legitimate pursuits of the taxi trade
- The lack of rank spaces is exacerbated due to drivers from out of town zones ranking in Inverness. The Trade feels strongly that if a driver applies to be examined on the knowledge test in an area, for example Caithness, then he/she is entitled to drop off in another zone, but not to sit on the rank waiting for new business.

- There is a strongly held view that the knowledge test should be enforced among PHC drivers to protect the reputation and livelihood of taxi drivers operating in the city, as well protecting the interests of the public.
- The notion of a Highland-wide licence for taxi drivers contradicts the enforcement of zoned knowledge tests with taxi plates showing area codes across the Highlands (the Trade refers to the Assistant Chief Executive's report to the TECS Committee of 19 January 2012 re Taxi Licensing) and would like to discuss this matter further
- The poor condition of some Highland roads is adding to the increased burden of repair & maintenance costs due to broken springs (£120) or hydraulic engine mounts (£240). Malcolm Ross at Clava Garage claims that every second vehicle he services has breakages as a result of the poor condition of the roads

3.2 Taxi services provided at Invergordon cruise ships

The Trade would also invite the Chair, Ms Maxine Smith, to attend Admiralty Pier in Invergordon during the height of the summer season when approx. 3,000 passengers disembark one of the large cruise ships to enjoy the benefits of a bespoke Highland taxi tour experience. Outstanding feedback can be provided from Captain Dunderdale and Bannermans regarding the vast logistical operation of Highland Classique Tours managed by the trained and dedicated staff and approx. 30-40 drivers who meet a huge demand in the market for professionally organised taxi tours that are unable to be serviced by local Invergordon operators alone.

The coordinated efforts of both the local taxi service providers and those from Inverness who are experienced tour operators is a testament to the joined up thinking and enterprising approach that the business men and women from the taxi trade have created to offer a unique Scottish experience to visitors entering the country via our Ports.

Many drivers take a great deal of pride in their role and show the initiative to impress tourists by adorning Highland Dress. They can be seen standing by their clean vehicles, smartly dressed in the kilt, wearing tartan ties or tartan trousers. Many will play Scottish music in their vehicles and some have been known to sing songs or recite Scots poetry. With years of driving experience, those who attend the cruise ships know the lay of the land like the back of their hand and are able to take tourists to nostalgic and romantic places they have only dreamt of in the movies. As a result, our international visitors show their gratitude for the uniqueness and pleasure of their Scottish experience by rewarding our customer-centric drivers.

3.3 Support initiatives for Wheelchair Accessible Vehicles

Drivers who operate Wheelchair Accessible Vehicles (WAVs) are fully committed to the service they provide for their disabled customers, despite placing themselves at a comparative disadvantage with their colleagues in the Trade. The Inverness Taxi Alliance engages with local MSPs, Leonard Cheshire House, Shopmobility, Local and National Access Panels and the WAV drivers to discuss options to improve the service for our customers who are facing issues of accessibility so that they can engage with normal, everyday activities, such as attending a doctor's appointment, going to the shops or visiting the cinema late at night.

The WAV drivers are also faced with the additional burden of manoeuvring heavy manual wheelchairs supporting large passengers, increased vehicle purchase/leasing costs and vehicle running costs, additional time constraints spent loading/unloading the ramps and wheelchairs, and the increased responsibility of providing general support to the customer with their access requirements. This brings additional costs and risks for the driver.

The WAV drivers would appreciate the opportunity for further dialogue with the Licensing Committee on the many issues that arise for both parties and to enlist their support in providing a workable solution. They would also appreciate feedback from the Council on the WAV survey from last August 2013.

4.0 Conclusion

In conclusion, the Inverness Taxi Alliance has consulted with their members to gather a fair and representative view from the Trade to determine their decision to either, submit a representation of the original Trade proposal, or, to fully accept the draft amendments of 10th February 2014 proposed by the Highland Licensing Committee.

A unanimous decision by those present was approved by the committee to:

1. Submit a representation of the original Trade proposal to achieve equilibrium with the tariff scale applied by Perth & Kinross Council in May 2012;
2. To oppose the draft amendments offering an increase of 30p to the initial flag for Tariffs 1, 2 and 3; and
3. To reject the increase of £1 added to the supplementary booking charge of up to a maximum of £6.50 to compensate for the cost of the outward journey for hires which commence 3 miles or more away from the taxi or taxi base.

Furthermore, the Trade has requested an opportunity to engage with the Council in an open-minded, formal consultation process in an attempt to have their voice heard and discuss their views, opinions and issues. The Trade also requests a full justification for the reasons pertaining to the unacceptability of the original proposal and supporting case submitted by the Inverness Taxi Alliance; a full justification for the rationale for the Highland Licensing Committee's draft amendments of 10th February; and, a detailed response to the additional supporting evidence & issues which ratify the original proposal by Inverness Taxi Alliance and which were not addressed in the draft amendments. The Trade would also wish to discuss a workable solution to achieve equilibrium with Perth & Kinross tariffs, given the added complication of the Tariff 2 issues.

In accordance with the BERR Code of Practice on Consultation, the Inverness Taxi Alliance has proven the following:

- Sufficient evidence has been made available for local government and public scrutiny to support their original proposal of 9th January;
- Appropriate clarity has been provided to define the scope and impact of their proposal, particularly in respect of disadvantaged groups of people;
- A clear request to ensure that all consultation responses fed into the process from various channels are examined through a qualitative approach
- Requested that a formal consultation approach is adopted with the Trade, similar to the example of best practice set by Perth & Kinross Council.

By introducing the mechanism of an Annual Open Forum, there is an opportunity to facilitate a collaborative working partnership between the Trade and the Highland Licensing Committee which would inform the strategic decision making process regarding the following areas:

- Street Scape planning
- Forthcoming tariff reviews
- The impact of consumer attitudes to the Trade and changing trends/behaviours
- Other issues impacting the sustainable future of the Trade

The Open Forum would ideally present an environment wherein respectful and cooperative discussions might influence the potential to create innovative, workable solutions to alleviate issues affecting the Trade such as:

- The frustration experienced by drivers and traffic wardens, as well as the undesired effect of increased pollution caused by the under-provision of taxi rank spaces

- Effective enforcement of zoning at weekends and the taxi knowledge test for PHC operators
- A joined up thinking approach to promote enterprising tourism initiatives which offer a unique Scottish experience to visitors and enhance the delivery of a customer-centric taxi transportation service throughout the Highlands
- Evidence of local government support initiatives to encourage the Trade to introduce more WAVs, thus providing an accessible 24/7 taxi service to passengers with disabilities

Members of the Inverness Taxi Alliance should be grateful if the Highland Licensing Committee would consider the above representation of their original proposal at their meeting on 1st April 2014 and provide an opportunity to engage with the Trade through a formal consultation process to respond to the evidence-base outlining their issues and in support of the proposal.

Average Fuel Prices – February 2011

	Unleaded Petrol	Diesel
Aviemore	130.9p	138.4p
Dingwall	131.2p	135.3p
Dornoch	135.9p	137.1p
Fort William	130.1p	135.2p
Inverness	128.1p	132.6p
Portree	134.9p	138.9p
Thurso	133.4p	138.9p

Figures obtained from www.petroprices.com – February 2011

Average Fuel Prices – August 2012

	Unleaded Petrol	Diesel
Aviemore	136.9p	141.9p
Dingwall	133.9p	135.9p
Dornoch	136.9p	141.4p
Fort William	136.7p	140.7p
Inverness	131.2p	135.9p
Nairn	135.2p	138.9p
Portree	139.4p	143.4p
Thurso	142.6p	146.6p

Figures obtained from www.petroprices.com – August 2012

Average Fuel Prices – January 2014

	Unleaded Petrol	Diesel
Aviemore	133.9p	140.9p
Dingwall	129.9p	137.4p
Dornoch	132.9p	140.9p
Fort William	132.9p	139.7p
Inverness	129.1p	136.9p
Nairn	135.6p	141.2p
Portree	134.4p	140.9p
Thurso	135.9p	143.2p

Figures obtained from www.petroprices.com – January 2014

TARIFF 1

COUNCIL					
	FLAG	1 MILE	2 MILES	5 MILES	10 MILES
ABERDEENSHIRE	£2.60	£3.80	£6.00	£12.60	£23.60
FIFE	£3.00	£3.80	£5.80	£12.00	£22.40
MIDLOTHIAN	£2.20	£3.80	£5.80	£11.40	£21.00
EAST LOTHIAN	£2.50	£3.70	£5.70	£11.90	£22.30
RENFREWSHIRE	£3.25	£4.05	£5.65	£10.05	£17.25
EDINBURGH	£2.10	£3.60	£5.60	£11.10	£20.35
SOUTH AYRSHIRE	£2.80	£3.60	£5.60	£11.60	£21.60
ARGYLE & BUTE	£2.70	£3.70	£5.50	£10.70	£19.50
DUMFRIES & GALLOWAY	£4.50	£4.50	£5.50	£11.50	£21.50
MORAY	£3.30	£3.30	£5.50	£12.10	£23.10
SHETLAND ISLANDS	£3.50	£3.90	£5.50	£10.30	£18.30
SCOTTISH BORDERS	£2.15	£3.75	£5.45	£10.55	£18.95
ABERDEEN	£2.40	£3.40	£5.40	£11.20	£21.00
ANGUS	£3.30	£3.30	£5.40	£11.30	£21.10
CLACKMANNAN	£2.00	£3.36	£5.40	£11.52	£21.72
PERTH & KINROSS	£3.00	£3.80	£5.40	£10.20	£18.20
WEST LOTHIAN	£2.60	£4.00	£5.40	£9.80	£17.20
DUNDEE	£2.87	£3.77	£5.27	£9.77	£17.27
ORKNEY ISLANDS	£3.50	£3.50	£5.20	£10.30	£18.80
GLASGOW	£2.40	£3.40	£5.00	£10.00	£18.20
SOUTH LANARKSHIRE	£3.00	£3.00	£5.00	£11.00	£21.00
EAST AYRSHIRE	£2.75	£2.75	£4.70	£10.40	£19.85
FALKIRK	£2.00	£2.90	£4.70	£10.00	£18.90
HIGHLAND	£2.50	£3.30	£4.70	£8.70	£15.50
INVERCLYDE	£2.40	£3.10	£4.70	£9.30	£17.10
STIRLING	£2.00	£2.90	£4.70	£10.10	£19.10
EAST DUNBARTONSHIRE	£2.20	£3.00	£4.60	£9.40	£17.40
EAST RENFREW	£3.10	£3.10	£4.60	£9.10	£16.60
NORTH AYRSHIRE	£2.50	£2.90	£4.40	£8.90	£15.20
NORTH LANARKSHIRE	£2.00	£2.80	£4.40	£9.20	£17.20
WESTERN ISLES	£2.60	£2.92	£4.20	£8.04	£14.44
SCOTTISH AVERAGE	£2.70	£3.44	£5.19	£10.45	£19.21
HIGHLAND	£2.50	£3.30	£4.70	£8.70	£15.50

TARIFF 2

COUNCIL					
	FLAG	1 MILE	2 MILES	5 MILES	10 MILES
ABERDEENSHIRE	£3.60	£4.80	£7.00	£13.60	£24.60
FIFE	£3.75	£4.75	£7.35	£14.95	£27.95
MIDLOTHIAN	£2.70	£4.30	£6.30	£11.90	£21.50
EAST LOTHIAN	£3.00	£4.20	£6.20	£12.40	£22.80
RENFREWSHIRE	£3.85	£4.65	£6.25	£10.65	£17.85
EDINBURGH	£3.10	£4.60	£6.60	£12.10	£21.35
SOUTH AYRSHIRE	£3.80	£4.60	£6.60	£12.60	£21.60
ARGYLE & BUTE	£3.20	£4.40	£6.40	£12.60	£23.00
DUMFRIES & GALLOWAY	£5.50	£5.50	£6.50	£12.50	£22.50
MORAY	£4.80	£4.80	£7.00	£13.60	£24.60
SHETLAND ISLANDS	£4.00	£4.50	£6.50	£12.50	£22.50
SCOTTISH BORDERS	£2.70	£4.70	£6.80	£13.10	£23.60
ABERDEEN	£3.40	£4.40	£6.40	£12.20	£22.00
ANGUS	£3.50	£4.20	£6.40	£13.00	£24.00
CLACKMANNAN	£2.66	£4.50	£7.26	£15.54	£29.11
PERTH & KINROSS	£3.80	£4.80	£6.80	£12.80	£22.80
WEST LOTHIAN	£3.00	£4.40	£5.80	£10.20	£17.60
DUNDEE	£3.44	£4.52	£6.32	£11.72	£20.72
ORKNEY ISLANDS	£4.50	£4.50	£6.50	£12.50	£22.50
GLASGOW	£3.40	£4.40	£6.00	£11.00	£19.20
SOUTH LANARKSHIRE	£4.00	£4.00	£6.70	£14.70	£28.00
EAST AYRSHIRE	£3.75	£3.75	£5.70	£11.40	£20.85
FALKIRK	£2.50	£3.70	£5.90	£12.50	£23.70
HIGHLAND	£3.00	£4.40	£6.30	£12.00	£21.60
INVERCLYDE	£2.50	£3.30	£4.90	£9.70	£17.70
STIRLING	£2.50	£3.70	£5.90	£12.70	£23.90
EAST DUNBARTONSHIRE	£3.70	£4.50	£6.10	£10.90	£18.90
EAST RENFREW	£3.65	£3.65	£5.15	£9.65	£17.15
NORTH AYRSHIRE	£3.00	£3.50	£5.30	£10.70	£19.70
NORTH LANARKSHIRE	£3.00	£3.80	£5.40	£10.20	£17.20
WESTERN ISLES	£3.25	£3.65	£5.25	£10.05	£18.05
SCOTTISH AVERAGE	£3.44	£4.31	£6.24	£12.13	£21.89
HIGHLAND	£3.00	£4.40	£6.30	£12.00	£21.60

Taxi Alliance Proposal 1

Tariff 1

Distance	Proposed	Current	Increase
1 Mile	£3.90	£3.30	15.4%
2 Miles	£5.50	£4.70	14.5%
3 Miles	£7.10	£6.00	15.5%
4 Miles	£8.70	£7.40	14.9%
5 Miles	£10.30	£8.70	15.5%
10 Miles	£18.30	£15.50	15.3%
15 Miles	£26.30	£22.30	15.2%
20 Miles	£34.30	£29.00	15.5%
30 Miles	£50.30	£42.60	15.3%
40 Miles	£66.30	£56.10	15.4%
50 Miles	£82.30	£69.60	15.4%
100 Miles	£162.30	£137.30	15.4%

Tariff 2

Distance	Proposed	Current	Increase
1 Mile	£4.90	£4.40	10.2%
2 Miles	£6.90	£6.30	8.7%
3 Miles	£8.90	£8.20	7.9%
4 Miles	£10.90	£10.10	7.3%
5 Miles	£12.90	£12.00	7.0%
10 Miles	£22.90	£21.60	5.7%
15 Miles	£32.90	£31.10	5.5%
20 Miles	£42.90	£40.70	5.1%
30 Miles	£62.90	£59.80	4.9%
40 Miles	£82.90	£79.00	4.7%
50 Miles	£102.90	£98.10	4.7%
100 Miles	£202.90	£193.70	4.5%

Tariff 3

Distance	Proposed	Current	Increase
1 Mile	£5.70	£5.40	5.3%
2 Miles	£8.10	£7.80	3.7%
3 Miles	£10.50	£10.20	2.9%
4 Miles	£12.90	£12.60	2.3%
5 Miles	£15.30	£14.90	2.6%
10 Miles	£27.10	£26.80	1.1%
15 Miles	£39.00	£38.70	0.8%
20 Miles	£50.90	£50.60	0.6%
30 Miles	£74.70	£74.40	0.4%
40 Miles	£98.50	£98.20	0.3%
50 Miles	£122.30	£122.00	0.2%
100 Miles	£241.20	£240.90	0.1%

Appendix 6

Taxi Alliance Proposal 2

	Proposed	Current	Increase
1 Mile	£3.80	£3.30	13.2%
2 Miles	£5.20	£4.70	9.6%
3 Miles	£6.50	£6.00	7.7%
4 Miles	£7.90	£7.40	6.3%
5 Miles	£9.20	£8.70	5.4%
10 Miles	£16.00	£15.50	3.1%
15 Miles	£22.80	£22.30	2.2%
20 Miles	£29.50	£29.00	1.7%
30 Miles	£43.10	£42.60	1.2%
40 Miles	£56.60	£56.10	0.9%
50 Miles	£70.10	£69.60	0.7%
100 Miles	£137.80	£137.30	0.4%

Highland Driver's Association

	Proposed	Current	Increase
1 Mile	£3.80	£3.30	13.2%
2 Miles	£5.20	£4.70	9.6%
3 Miles	£6.50	£6.00	7.7%
4 Miles	£7.90	£7.40	6.3%
5 Miles	£9.20	£8.70	5.4%
10 Miles	£16.00	£15.50	3.1%
15 Miles	£22.80	£22.30	2.2%
20 Miles	£29.50	£29.00	1.7%
30 Miles	£43.10	£42.60	1.2%
40 Miles	£56.60	£56.10	0.9%
50 Miles	£70.10	£69.60	0.7%
100 Miles	£137.80	£137.30	0.4%

Distance	Proposed	Current	Increase
1 Mile	£4.90	£4.40	10.2%
2 Miles	£6.80	£6.30	7.4%
3 Miles	£8.70	£8.20	5.7%
4 Miles	£10.60	£10.10	4.7%
5 Miles	£12.50	£12.00	4.0%
10 Miles	£22.10	£21.60	2.3%
15 Miles	£31.60	£31.10	1.6%
20 Miles	£41.20	£40.70	1.2%
30 Miles	£60.30	£59.80	0.8%
40 Miles	£79.50	£79.00	0.6%
50 Miles	£98.60	£98.10	0.5%
100 Miles	£194.20	£193.70	0.3%

Distance	Proposed	Current	Increase
1 Mile	£5.80	£5.40	6.9%
2 Miles	£8.20	£7.80	4.9%
3 Miles	£10.60	£10.20	3.8%
4 Miles	£13.00	£12.60	3.1%
5 Miles	£15.30	£14.90	2.6%
10 Miles	£27.20	£26.80	1.5%
15 Miles	£39.10	£38.70	1.0%
20 Miles	£51.00	£50.60	0.8%
30 Miles	£74.80	£74.40	0.5%
40 Miles	£98.60	£98.20	0.4%
50 Miles	£122.40	£122.00	0.3%
100 Miles	£241.30	£240.90	0.2%