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22 July 2019

Dear Ms Millar,

**THE GLASGOW CITY COUNCIL,
Consultation on future policy development of taxi and private hire car licensing**

GoBike is pleased to have the opportunity to comment on the proposals for the future policy of taxi and private hire car licensing. Those of us who cycle frequently find ourselves sharing road space with these vehicles and sometimes, because of the high number of private motor vehicles on the city's roads and the pressure on taxi and private hire car drivers to deliver the service they offer, find ourselves in conflict. However, many of us, particularly if we do not own a private car, will use taxis and private hire cars for journeys where travel by bike would be inappropriate. Thus we have a vested interest in such vehicles and our responses to your questions are below.

1. Whether a policy is adopted that in determining the suitability of a taxi or private hire car in terms of section 10(2) of the Civic Government (Scotland) Act 1982 Act, all such vehicles to be used as a taxi or private hire car will require to meet the emissions standard Euro IV for petrol vehicles and Euro VI for diesel vehicles by 31 December 2022?

GoBike: Yes, it is our view that all such vehicles must reach this standard by 31 December 2022, but why do we need to wait so long? Taxis and private hire cars provide a public service, as do buses, but, in addition, are on our streets 24 hours a day. We understand that very few taxis meet Euro 6 requirements, but most taxis are waiting in stances for long periods and many private hire cars are waiting for customers for some time and it sometimes seems that it is only the minority of these vehicles turn their engine off while stationary. Taxis should certainly be working to the same timescale as buses; in fact, since buses carry so many more people than taxis and private hire vehicles, there is a strong argument that taxis should be subject to more rigorous requirements than buses. The health risks to people in the city must be a prime concern and efforts must be made to reduce pollution as soon as we can

2. Whether from 1 January 2020, the policy requiring that taxi vehicles be no more than five years of age at the date of lodging an application for a new licence or the substitution of a vehicle is removed for all applications for new and substitute taxi vehicles, subject to the replacement vehicle being a newer vehicle than that currently licensed?

GoBike: This proposal seems sensible but should be risk based, with all vehicles being subject to road and carriage worthiness tests on a regular basis. The efficiency of the internal combustion engines must be checked on a regular basis, but we feel there could be some relaxation of this rule for zero emission vehicles.

3. The suitability of implementing a risk based inspection program as from 1 January 2023, which would reduce the number of inspections required for newer vehicles and increase them for older vehicles; and

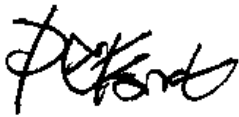
GoBike: We agree with this proposal as it works in favour of those operators who keep their vehicles in good condition and/or replace them at regular intervals. However, the inspection frequency should be higher for internal combustion vehicles than for electric vehicles.

4. From 1 January 2020, whether all advertising livery should be removed from the bodywork of a taxi aged 10 years or more prior to the annual inspection?

GoBike: Absolutely; the inspection of such vehicles must be extremely rigorous and a good case for having such vehicles on the road must be made. Appropriate modification must have been made to bring such vehicles up to current standards.

Overall, GoBike is very much in favour of Low Emission Zones. While people who cycle tend to be healthier than those who take little exercise, it is us who can frequently be stuck in traffic queues in all the pollution and unable to reach the advanced cycle boxes. We were very disappointed with the very slow timetable of the current Low Emission Zone in Glasgow and wish to see all vehicles that come into the city, particularly the city centre, meet the requirements as soon as possible.

Yours sincerely



Tricia Fort
for Consultations, GoBike