

**Response to submission made at the end of Taxi Forum 20<sup>th</sup> July 2017- dated 01/07/17.**

**MOT stations.**

*We, the drivers feel that we have been regularly mistreated by the staff at the testing station on Sandy Park Road, often asking us to carry out unnecessary work on the vehicles when the council requirements have already been met. We request that we be allowed to use **independent** MOT testing stations so that the staff do not take advantage of drivers whilst knowing the drivers have no other option.*

**1. MOT Stations**

The allegations made are serious ones, and similar in nature to those made in previous forum meetings. Every time these concerns have been raised, we have consistently asked for specific details of the driver and vehicle and actual complaint to be passed on, so they can be effectively investigated- to date nothing has been passed to the Council. If a complaint is received, we can assure you it will be thoroughly investigated.

It is important that drivers are made aware that the manager on the site is always available to talk to drivers who feel that they have been treated unfairly and to try and resolve the situation immediately.

One of the advantages of Fleet Services conducting the Certificate of Conformity on behalf of the Licensing Services (as you know, an MOT is also provided free as part of that service) is that there is absolutely no incentive for the inspectors to find unnecessary fault with vehicles.

There have actually been no complaints regarding the service provided by Fleet Services since April 2016 *which was not upheld*. If any driver does want to complain they can either:

- Use the internal complaints procedure, which is publicised within Fleet Services and which can also be found on the council website.

[https://www.bristol.gov.uk/en\\_US/complaints-and-feedback/complaints-procedures](https://www.bristol.gov.uk/en_US/complaints-and-feedback/complaints-procedures)

- If the complaint is about an MOT failure, as this is a VOSA MOT testing station, you have a statutory right of appeal via VOSA. This has been no appeal since December 2014.

I would also highlight Fleet Services MOT test station is independently audited annually by the RMI (Retail Motor Industry). We would expect them to find any irregularities. All MOT testers undergo externally provided annual training with an on-line assessment.

The request to use external garages has also been made previously, and has been looked in to. The main reason why we are not considering this at the moment is that we believe the current station allows us to be consistent across all taxis, to make sure we provide a high quality service, and it is easier for us to watch out for any complaints and make sure people are treated fairly. I am sure you will also appreciate the financial difficulties the authority finds itself in and any move away from using Fleet Services will cost the Council a lot of money which would not be helpful in a time of budget cuts.

The authority also conducted a survey amongst private hire and hackney carriage proprietor users of Fleet Services, the results of which were inconclusive as we had a mix of responses.

## **2. Taxi Ranks**

*The Council have been rapidly decreasing the number of taxi rank spaces from key locations around the city centre whilst increasing the number of taxis. We request to have ranks at the BRI, outside the full moon on Stokes Croft, Southmead Hospital, Bristol Hippodrome (which has been removed from the Council's plans) and other such locations in consultation with trade representatives.*

Works have been ongoing to remodel Bristol City Centre and during this time unfortunately it was necessary for some central taxi ranks locations to be suspended, removed or relocated. Whilst the central rank outside the Hippodrome has been removed, 2 new ranks on College Green have been introduced with a net gain of 8 taxi spaces and further to this, a 5 bay evening rank will soon be available outside Boots on St Augustine's Parade.

The main city centre rank has been relocated some 30 metres away from the previous location and once fully complete and visible will provide an increased provision for taxis. This is a net gain of an additional 15 spaces and on Friday and Saturday evenings, this rank extends beyond St Stephens Street allowing up to 24 taxis.

There will also be alternative ranks at Quay Street, Baldwin Street and Victoria Street, these are currently going through the statutory process and will soon be available. However it must always be recognised kerbside space is at a premium within the City Centre and Bristol City Council has to balance the needs of taxis, coaches, loading, parking, disabled bays etc.

All of these changes, which are still ongoing means that there is a net increase in rank space of 27 spaces so far.

Turning to the specific request for taxi ranks, the evening rank outside Boots close to the Hippodrome will be available soon as mentioned previously. The Full Moon and the BRI locations will be investigated, however Southmead Hospital is situated on a private estate. We will approach the hospital trust to see what might be possible, but the roads are not public highway and the local authority does not have jurisdiction over what is located there.

## **3. Uber**

*We request that you revoke the operator's license given to Uber on grounds of Uber employing hundreds of TfL licensed vehicles to work full-time in Bristol and also other out of district Ubers who are working in Bristol full-time with the council powerless to stop them .Uber.*

We are very aware of the TfL /Uber situation and are watching closely the outcome of the appeal to see what the legal decision is. At the moment, there is no legal basis that we could use to consider revoking Uber's operator's licence in Bristol. Our fit and proper standards apply equally to all Operators and no-one operator can be treated differently than others.

It is also worth highlighting, as we have explained in forum meetings, that even if Uber did not have an operator's licence issued by Bristol City Council, Uber could still perfectly legally dispatch vehicles into the Bristol area. What is needed is a review of the national taxi licensing legislation which is badly needed following changes in the market place. All taxi drivers can approach their MPs to ask them to raise this with the Government. The Chair of Public Safety has already asked one of the MPs to ask questions in Parliament and the Mayor has agreed to raise this with other Core Cities.

#### 4. Low Emission Zone.

*We request that you remove the proposal of charging any non-euro 6 diesel or post euro 4 petrol public hire taxi a city centre emissions charge, on the grounds that this is a public transport licensed by yourselves, and we have to go where the customers want us to including the city centre, hence it's unfair to charge us for what we have no choice. We also request that you change the rules on replacement vehicles and not insist that they must be euro 6 as it defeats the object of buying a three and half year old car as they do not exist in Euro 6, and by the time Euro 6 cars are three and a half years old you may well bring out a rule for Euro 7 and so on. Please do not make up rules on a daily basis without any thought or consideration for the impact of cost on the drivers.*

Bristol suffers from very poor air quality and this leads to around 300 deaths a year. The Government has said that our air quality is illegal in many areas, and they have a UK Air Quality Action Plan in which they have named Bristol as one of the areas that need to take action. As part of that, councillors voted in Full Council last November for us to look at bringing in a Clean Air Zone. Air pollution particularly affects residents of central areas of the city and those who spend a lot of time on driving on the main roads are suffering even more than those walking on the pavements.

The improvement of air quality is a priority for the Mayor, and it is in his manifesto and in the Council's Corporate Plan. Reducing emissions from taxis and other forms of public transport is a key component to achieve this aim.

The Government has specified that Taxis and Private Hire Vehicles are a priority for Clean Air Zone action and along with buses are the first group of vehicles to which charges are likely apply, followed by HGVs, LGVs and cars in that order. The City Council must operate within what the Government lays down, **but no decisions on actual charges have yet or where the zone will cover have been made.** As soon as further information is available there will be consultation with the Taxi Forum.

Set against this background, the taxi policy changes made in February 2017, following consultation with the council's air quality experts, required diesel vehicles to be Euro 6. This was necessary to improve air quality, and ensures that licensing policy is supporting the national Clean Air Zone requirements.

#### 5. Saloon Cars.

*Since the number of wheelchair accessible taxis heavily outweighs the number of registered wheelchair users we request that the condition of all taxis being wheelchair accessible be removed. This will also help elderly people who find it extremely difficult getting into wheelchair accessible vehicles because of their height from the ground. (elderly passengers considerably outweigh wheelchair users and drivers experience such issues with elderly*

*people on a weekly basis, whereas a wheelchair passenger may come along on average once every year) .If you are not convinced by this please carry out a survey.*

There is no such thing as 'registered wheelchair users'. The Council brought in the accessibility policy over a decade ago as part of our commitment to equality of access.

A meeting was held recently concerning saloon vehicles, attended by trade representatives and users and useful points were raised. Disabled and older people, who are not wheelchair users, have also raised a number of wider concerns about their access to taxis, which need to be resolved. These discussions are still ongoing, and we need to listen to all parties and consider the Government's current consultation on access before any further review of the policy is considered.

## **6. Meter Rate**

*We request that the evening meter rate should begin at 6pm as the current rate is actually lower than the previous rate 2 of a few years ago. Also rate 4 which is currently Saturday and Sunday nights should be Friday and Saturday nights. We also request a fare review as the last review was approximately four years ago.*

On 24<sup>th</sup> May 2017 a meeting was held between trade representatives and officers of the council. The reps present agreed to consult with the trade and submit their formal proposals for fare changes. We haven't seen them yet, and so as soon as we get them we can consider a way forward, and write a paper for the Cabinet who need to make the final decision.

Officers are keen to ensure to work with trade representatives to agree a formula to review fares on an annual basis and drafts of that calculator have been shared with representatives.

## **7. Bristol Blue**

*Manufacturers of vehicles change their shades of blue on a regular basis, to buy a new car in the shade of blue that meets your requirements is almost impossible. So drivers are having to pay for respray of new vehicles on top of the cost of purchasing them. We request a review on the colour, as we feel not enough thought has been given to the financial impact on drivers.*

Standard colours produced by manufacturers do of course change over time. Some are sufficiently close enough to the Bristol Blue standard that they do not require a subsequent repaint or wrap. Others will do, and of course with the ability to buy second hand vehicles, many will require a colour change to be accepted on to the fleet. There are currently 9 colours which we know are acceptable. All the major vehicle converters know Bristol's requirements well, and of course if a new colour becomes available then this will be considered. For example, the authority received a request from Cabs Direct to consider a new colour from Ford which was considered by Committee in February 2016 and approved.

Like many towns and cities, hackney carriages need to stand out from private hire vehicles. This is also important for your business, as customers then recognise them as a key part of the City's public transport. Bristol Blue is now easily recognised as the colour of Hackney Carriages, and we will work with Destination Bristol to further promote them as an important part of the transport system for tourists. A move away from Bristol Blue would be backward

step, and would be likely to impact on the number of customers, and so is not being considered.

We also note the Bristol hackney carriages own 'App' based booking system references Bristol Blue in its name.

## **8. Licensing Office**

*Many drivers are complaining about late arrivals of driver and vehicle licenses. We request a more efficient method of dealing with applications so that drivers are not being forced not to work for considerable periods of time through no fault of their own.*

The Service has made significant investments in more staff and improved systems, which have been well received in some parts of the trade. We always welcome constructive comments as to specific improvements we could make.

As demand across the service sometimes peaks, this has, on rare occasions, led to delays over the published service standards. Again, if you can give us examples we can look into them. It would also be really helpful if messages got out to all drivers about the importance of meeting deadlines, particularly for their DBS and Right to Licence checks, as when some documents are received late, we cannot turn them around in time which will impact on applicants.