

Sirs,

I refer to the notice placed in the local newspaper regarding proposals to amend the Taxi Fare Tariffs – Clydebank Zone.

As invited I wish to make representations on those amendments for and on behalf of several Taxi operators who like myself were not consulted prior to the proposals.

Consultation

As reported to you at the previous taxi fare review, neither I nor many others in the trade were invited to take part in the consultation prior to your decision.

The legislation clearly states that before setting fares Council is required to consult with “members of the trade or their representatives”. It does not state “the trade or representatives of some of the trade”. The Council have once more ignored the legislation as it is drafted.

Further, in the written invite to now make representations, received from the Council Officer he writes to specifically prevent Licensed Taxi drivers from making representations in their own Taxi fare review. Mere Taxi drivers received no such letter either.

There is no basis in written legislation nor guidelines for this removal from the process.

It is an offence to of the obligations of the Council to act responsibly and fairly towards the persons whom Taxi fare matters most. Taxi drivers are also the group that pay the greatest amount towards the reviews and all other costs of Licensing.

I note there is no such exclusion on the Council website which invites ‘any persons’ to make representations as the legislation is so drafted.

As for the rest of us and our late inclusion in the process. Being invited to make representations after the decision is made asking Council to change its decision does not satisfy the requirements of the legislation.

However, this representation focuses on the failure to adequately cover drivers’ costs and maintain earnings and the impact of this on the public.

In short drivers are not making enough money and so the public are finding it increasingly difficult to get a Taxi at peak times.

Proposed Alterations

In general terms, despite repeated requests for incremental increases at reviews since at least 2009 crucial elements of the Clydebank fare chart have remained static. incremental increases in previous reviews since at least 2009. Not so the Dumbarton Fare chart.

Clydebank Taxi trade earnings have fallen considerably behind Dumbarton during this period. So much so that where Taxi business in Dumbarton still trade for over £20 000, Clydebank Taxi Licenses have been surrendered.

The highlight of this failure is the charge for waiting time, steadily increased in Dumbarton from £12 to £36 per hour, whilst Clydebank remained at £12 per hour. A rise to £18 per hour is still 100% lower, is wholly inadequate with no cost analysis at all far less anything that stands to scrutiny.

It is noted that the proposals have at last taken some cognisance of the arguments made at previous reviews and there is some adequacy in some of the proposals.

1. The proposal for tariff increases.

Referring to the Council minutes there is no analysis or study of costs provided nor any indication of the basis which the proposed increases are made. No costings nor detail to support what again appears to be a finger in the air stab at it.

Tariff 1 flag fall and running mile are increased again without any detail or explanation. Setting aside any comment, this is the baseline.

Lasting 13 hrs. of each day almost all Taxi drivers work this tariff.

The customer base is generally shoppers, people of partial or no employment and late afternoon workers returning home. The customer base in higher numbers and steadiest flow. It is also supplied by considerably higher numbers of available Taxis. Supply only becomes lower than demand ie regular queues at ranks after 5pm.

Tariff 2

The number of drivers regularly working during Tariff 2 can now be counted in almost single figures even at weekends.

Work is nominal from Sunday to Thursday and probably mostly limited to radio calls.

Friday Saturday and to a lesser extent Sundays demand is low except for 2-3 hrs after 11pm.

The peak demand is 11pm until approx. 2:00 am and customers forever complaining that there are not enough Taxis. These customers are generally people who work and are not using Taxis all week. They are socialising and just want to get home.

The reason there are not enough Taxis is there is not enough incentive or reward for drivers to be available.

The fares are far too low within the Clydebank area, and only negotiated fares outwith Clydebank are adequate.

Drivers are eager for this work but that further diminishes the availability of local supply.

For far too many reviews Council have ignored requests to keep Tariffs 2 and 3 at sufficient levels and have made flat increases across the fare chart.

The proposal of an extra 10p on the running mile appears to acknowledge that increases must maintain the balance. But this is nowhere near adequate to restore the difference after 15 years.

And why not the flagfall also?

10 years ago drivers who worked late on Tariff 2 midweek were asking for £5 flagfall.

£5 flag fall and 10p each 1/24th of a mile not unreasonable expectation, for customers who want to find taxis available to them at night. (same per mile as Dumbarton)

Tariff 3

Should be similarly increased to £6 and 10 p each 1/28th of a mile. (20p per mile less than Dumbarton)

Bringing the flagfall into line with Dumbarton at this time to ½ mile instead of 5/11ths would make it easier for both drivers and public to understand. And lessen the burden on short journey passengers.

2. Elements other than Flag Fall and Running Mile.

We again bring to the Council attention several elements of the fare chart where Clydebank drivers are disadvantaged compared to those in Dumbarton.

Christmas and New Year Tariff.

The Clydebank Zone Tariffs drop down at 12:00 midnight whereas Dumbarton tariffs continue until 6:00am.

When public demand is increasing as licensed premises etc are closing, Clydebank fares decrease.

This matter was addressed in Dumbarton area a few years ago and should be relatively simple to address. And without opposition as the public just want to get home and not find a shortage of taxis because drivers have gone home.

Please bring the Christmas and New Year timescale in line with Dumbarton.

Fares for Waiting

No increase since before 2008 in Clydebank. Steady increments over the last 12 years in Dumbarton increased to £36 per hour last November the proposed increase to £18 means **Dumbarton drivers remain at double the Clydebank tariff**. There is no reason a Clydebank driver should earn less than a Dumbarton counterpart on this very measurable and equal element of the fares.

It is difficult to find any difference between a Clydebank driver and a Dumbarton driver on waiting time. Each pays the same licence fees. Drivers in both areas should have the same take home earnings.

Cost examples:

Clydebank average 'weigh in' at £180/ wk. Based on 40-hour week is a cost of £4.50/hr.
Proposal to amend to 10p per 20 secs or £18 /hr gross.

£13.50 per hour gross whether it is midday Monday or Saturday midnight.

From this the driver must set aside Holiday pay, Sickness Pay, Pensions etc.

Unlike otherwise self-employed persons this rate is **set by West Dunbartonshire Council**. And in real terms is well below the national living wage and WDC policy.

This rate is not the what the driver earns, the charge is approximately 50% of true per hour earning after non passenger time is accounted for.

The council proposed increase for Tariff 1 charge is £6.80 for a 2 mile journey. At a modest 20 miles per hour 2 miles would take 6 minutes. Ie the charge is equivalent to £68 per hour. Increased fuel is nominal part of that.

Can there be any justification for drivers dropping from £68 to £18 per hour? Even £36 is a nominal charge.

Tariff 2 where waiting time matters most it is £75 per hour or more as traffic is less congested and average time to do 2 miles is much less.

Please bring waiting time in line and to the same level as Dumbarton.

Fares for additional passengers.

Increased number of passengers (sharing taxis) with multiple drop offs is most frequent and most burdensome during Tariff 2.

Unamended in Clydebank for at least 20 years, the additional 10p per passenger more than 2 is derisory and long overdue addressing.

Dumbarton tariff is approximately 25% increase for 5 or more passengers with Tariffs 4, 5 and 6.

There is no reason why Clydebank drivers should not have similar fare tariffs.

However a flat £7.50 extra charge for more than 5 passengers is a possible alternative at this time.

For 5 passengers, this amounts to only £1.25 per journey. A nominal charge when saving the cost of another Taxi.

Christmas and New Year Tariff.

The proposed changes to timing of the application of Tariff 3, as requested at many previews reviews, is welcomed but does not address a significant failing.

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When public demand is increasing as licensed premises etc are closing, Clydebank fares decrease.

This matter was addressed in Dumbarton area a few years ago and should be relatively simple to address. And without opposition as the public just want to get home and not find a shortage of taxis because drivers have gone home due to the drop in Tariff.

