


## APPENDIX 2

Allan .Nugent



15 July 2025

Dear Susanne Millar

I wish to make a representation/ objection regarding the 2025 taxi tariff review, which is as follows.

1. Reinstate the Extras per person after 2 , updated to 30p which falls in line with the economic climate and in tune with the 30 pence increments on the tariff card, alternatively go back to 1987 and recalibrate them on the same percentage basis as the soiling charge
  - The extras p/p were removed from the tariff card without research
  - Trade reps did not consult or ballot their members regarding extras p/p
  - Not all trade reps approved the extras p/p were to be removed apparently,
  - The extras p/p were not allegedly agreed upon or discussed by the Licence and Regularity Committee (no proposal documents lodged)
  - The extras p/p were allegedly removed based on a simple opinion.
2. Revert all comparison elements to silver coin values in order to calculate a true and accurate economic based value .Dr Coopers method of adding and subtracting individual element percentages deliberately depresses the true annual total collective cost of all elements when calculated in a silver coin basis
3. Insurance has increased, not decreased (14.38%) Unite and G.T.O.F have confirmed the average increase is 8% The ONS figure as no bearing on actual insurance real time quotes
4. The taxi price used is a special order basic vehicle and is not readily available, falling short of the readily available vehicle at £71,207 after £4,000 grant

It should be noted that Dr Coopers reports are handed to trade reps with strict instructions to not discuss with their members, Trade reps are unable to get input and direction from their members in other words taxi operators are kept in the dark

***The second edition of the Scottish Government's Licensing of Taxis and Private Hire Car Best Practice Guidance for Licensing Authorities, published in April 2012, provides that Councils.***

*Carrying out taxi fare scale reviews should pay particular regard to the following advice set out in paragraphs 2.34 to 2.37 of the Scottish Development Department Circular 25/1986: "The Secretary of State expects that in fixing fares, authorities will want to pay primary regard to the costs incurred by the trade, having regard to the capital costs (including interest payments) of the vehicles, the costs of maintaining and replacing them to the standards required of the licensing authority of employing drivers and prevailing level of wages and costs in related road transport industries. In the Secretary of State's view, the public interest is better served by ensuring the maintenance of an adequate taxi service by giving the trade a fair return than by depressing fares for social reasons, however understandable.*

Dr Cooper removed the extras per person after two in 2020, without any mention, discussion, research, notification nor referenced in the 2020 report about the extras per person after two.

**Dr Cooper stated at the MS zoom meeting** on the 2nd December 2020, when presenting the 2020 review, *"the passenger extras levy was essentially redundant as the added fuel cost of additional passengers was 'insignificant'".*

It is not the cost of carrying extra passengers it's the potential earning capability , and most U.K cities recognise this and allow extras per person, confirmed by Dr Cooper ,Glasgow did up until 2020

Is this Council protocol, legislation or practice to depress taxi drivers' earnings capability by denying taxi drivers a fair return on their investment without credible research .

To date, no credible research has been carried out to justify their removal.

Tariff reviews are supposed to be set on accurate and reliable mathematical data and credible research, not based on an off the cuff remark made at presentation meeting

Two years later, after the extras had been removed .Dr Cooper stated, *"While we do not oppose the use of extras for additional passengers, we contend the rate of any such supplemental fee would significantly exceed the actual costs.....* Dr Cooper does not oppose the use of extras. Despite saying they were redundant, so why did he remove them, and why did he not reinstate them.

A possible equality issue has allegedly been created by depressing taxi drivers potential earnings, based on a simple opinion with no credible research to justify such action.

Passenger extras are widely used in tariff structures across Scotland and the United Kingdom.

Rather than submit 60 pages of data, I ask that the Licence and Regularity Committee use the 2020 review and the 2021 review, both editions, for reference and have them to hand

Yours Sincerely

Allan Nugent