Appendix 1

From: [redacted]
To:
Cc:
Subject:
Date:

[redacted]

From: Andy Chapman
Sent: 29 March 2025 12:14
To: Petitions
Subject:

Don't forget the reason people can't get a black cab or a private hire car on nights when they are in demand is because black cab drivers and private hire drivers are parking there cars up at points in the city centre to pirate for trade cherrie picking what hire they want and charging over priced fares the proof is in the pudding councilor Wilson and your inforcement know about this and do nothing about it one example queen Street at Royal exchange Square Friday and Saturday night from 11 pm you will find black cabs and private hire cars lined up illegally to pirate for trade I'm a black cab driver and I have resettley came away from the taxi trade because there is know black cabs in Glasgow hiring drivers because they are so many fewer cabs on the road hence the council have the licence plates that were handed back due to the lez rules

[redacted]

From: [redacted]
To: Licensing Enquiries
Subject: Submission: Over provision of Private Hire Cars and Unmet Demand of Taxi Services
Date: 27 May 2025 12:47:28
Attachments: [redacted]

Hi

Please see attached Submission: Over provision of Private Hire Cars and Unmet Demand of Taxi Services

Kind Regards

[redacted]
Glasgow Chamber of Commerce
30 George Square
Glasgow G2 1EQ
[redacted]
www.glasgowchamberofcommerce.com

GLASGOW
CHAMBER OF COMMERCE

24 May 2025

Submission: Over provision of Private Hire Cars and Unmet Demand of Taxi Services

1. Introduction and position

Glasgow Chamber of Commerce (GCOC) has been the voice of business in Glasgow since 1783. Alongside supporting our growing membership, we champion the city region economy and work to create conditions conducive to sustainable economic growth.

We welcome the opportunity to provide a submission to Glasgow City Council's consultation on Over provision of Private Hire Cars and Unmet Demand of Taxi Services. GCOC welcomes this review as a key enabler to support and drive forward the recovery and growth of Glasgow city centre. This review is both necessary and timely given the growing evidence of unmet transport needs, especially in the city centre and during peak demand periods. Glasgow's current cap on the number of licensed taxis and Private Hire Cars (PHCs) is unique across the UK and is increasingly misaligned with the city's ambition for economic recovery, environmental leadership, and a thriving night-time economy.

The city centre is the heartbeat of Glasgow's economy, but it is still facing significant challenges in recovering from the pandemic. Our research shows that the availability of taxis and PHCs is a significant factor in visitor attraction, particularly at peak times. Glasgow is the only city in the UK to operate a cap on PHCs and this is limiting the options for late-night visitors to get home. This is actively deterring people from coming into town, which is something we cannot afford if we want to see growth and vitality return to our city centre.

Glasgow Chamber of Commerce, endorsed by our member businesses and governing Council of Directors, promotes the removal of the taxi and PHC cap as an intervention that will create competition to benefit consumers, reduce waiting times and associated public safety concerns, and offer the ability to meet escalating demand for large events or busy weekends.

The Chief Executive of Glasgow Chamber of Commerce Stuart Patrick is co-chair of the Glasgow City Centre Taskforce and endorses the taskforces consultation submission calling for the removal of the cap.

2. Evidence in Support of Removing the Cap

2.1 Economic Recovery and City Centre Vitality

Glasgow city centre is still facing significant post-pandemic recovery challenges, with footfall remaining 18% below pre-COVID levels. Easy access to transport is essential to encourage residents, visitors, and workers to return to the city centre, particularly at night. Research shows that 45% of night-time economy (NTE) visitors rely on taxis or PHCs to get home, and 28% cite transport difficulties as a key frustration.

Shortages of taxis and PHCs directly deter visits and reduce consumer confidence in spending time in the city centre. Businesses report that this impacts their revenue and limits their growth potential, particularly during evenings and weekends.

30 George Square, Glasgow G2 1EQ
[redacted]

glasgowchamberofcommerce.com

2.2 Event Capacity and Tourism Impact
Major events—including concerts at the OVO Hydro and festivals like Celtic Connections—are crucial to Glasgow's economy. Uber data reveals that in 2024 alone, over 24,500 trips went unfulfilled at key transport hubs due to insufficient PHC availability. One million Uber trips went unfulfilled citywide between April 2024 and March 2025.

Glasgow must ensure that its transport infrastructure, including PHCs, is sufficient to meet visitor demand and enhance the city's reputation as a safe and accessible tourist destination.

2.3 Public Safety
The lack of availability of taxis and PHCs at peak times raises significant public safety concerns. As public transport typically ceases operation by midnight, taxis and PHCs are often the only viable option for night-time travel. Delays and long waiting times put vulnerable people at risk, especially at closing times for bars, clubs, and events. It also impacts people working outwith normal hours and this could be exacerbated by other transport policy, including the Low Emissions Zone and parking charges.

2.4 Comparative City Practice
Other major Scottish cities such as Edinburgh, Aberdeen, and Dundee do not have a cap and instead rely on market dynamics and unmet demand surveys to guide licensing. These cities report thriving taxi and PHC sectors and have greater flexibility to meet demand, including at key periods and major events. Glasgow is now the UK outlier, and this policy risks leaving the city behind in terms of transport innovation, vitality and economic competitiveness.

3. Conclusion and Recommendation

The city centre is the heartbeat of Glasgow's economy, but it is still facing significant challenges in recovering from the pandemic. Our research shows that the availability of taxis and PHCs is a significant factor in visitor attraction, particularly at peak times. Glasgow is the only city in the UK to operate a cap on PHCs and this is limiting the options for late-night visitors to get home. This is actively deterring people from coming into town, which is something we cannot afford if we want to see growth and vitality return to our city centre.

Glasgow Chamber of Commerce, endorsed by our member businesses and governing Council of Directors, promotes the removal of the taxi and PHC cap as an intervention that will create competition to benefit consumers, reduce waiting times and associated public safety concerns, and offer the ability to meet escalating demand for large events or busy weekends.

Regards

[redacted]

Stuart Patrick
Chief Executive

20 May 2025

Dear Mairi

City Centre Task Force: Response to Consultation on Over provision of Private Hire Cars and Unmet Demand of Taxi Services

1. Introduction

1.1 The City Centre Task Force (CCTF) was convened as Glasgow began to recover from the impacts of 2019. The CCTF, a public and private sector partnership, is focused on opportunities for change and improvement within the City Centre. The Night-Time Economy (NTE) including the creative and cultural sectors, is on a trajectory of growth which has brought significant economic advantages and in terms of the share of city centre spend is expected to continue to grow.

1.2 To help support this recovery and growth the CCTF has established four sub-groups: Operations, Night-time Economy (NTE), Development and Transport. The sub-groups each have a specific focus, as well as a role in mutually supporting each other, with the Transport Sub-group supporting the NTE and within that, the wide variety of business, sporting and musical events that the city hosts.

1.3 There is significant negativity of consumer perceptions around reliable transport for getting home, including the assertion that this factor is considered to inhibit the recovery of the NTE. In particular, consumer concern over lower availability and higher costs of taxis and private hire vehicles has increased significantly and the CCTF Transport Sub-group therefore welcomes this opportunity to respond to the consultation on Over-provision of Private Hire Cars and Unmet Demand of Taxi Services which is currently underway.

1.4 Given that consumer survey responses indicate that improvements in transport availability would be an important factor in attracting people into the city centre, for the reasons set out below and particularly in recognition of the assertion that the removal of the limit on taxi and private hire licences is one of a number of transport related actions that would improve the availability of public transport choices to support the NTE, the City Centre Task Force supports the removal of the limit.

2. Growth in the Nigh-time Economy

2.1 The success of the city centre's retail and NTE sectors, along with its internationally recognised creative and cultural offering, does much to underpin investment in Glasgow. Investors and employers see value in the strength of these sectors and how they enhance the attractiveness of the city centre.

2.2 Food & Drink and Entertainment sales in Glasgow have increased by 55% since 2019 and this has increased the size of the market share to over 37% of all sales[1]. Spend data for cities and sectors mentioned only takes card sales into consideration.

2.3 By comparison, although Manchester's sales growth has been noticeably slower than Glasgow's since 2019, their Food & Drink sector still accounts for 44% of total sales[2]. This is considered to be indicative of how growth might continue to develop in Glasgow and of the increasing demand that the NTE will make on all forms of transport serving the city.

2.4 Much of the growth within the Food & Drink sector since 2019 has come from pubs and bars (including established clubs such as the Garage and Sub Club) which have achieved 147% increase and Restaurants at 47%[3].

2.5 While footflow, the measurement of passing pedestrians by stationary counters, is still below 2019 levels, it is clear that there has been a shift in consumer demand and nighttime footfall, which is up against 2019 and has recovered at a faster rate than footfall overall[4]. The table below the change to footflow data since 2019 for the whole of 2024 and the first quarter of 2025.

Per hour (all counters):	2024	2019	Comparison 2024 v 2019	Comparison Q1 2025 v Q1 2019
6pm-10pm	6,950,106	7,098,522	-2.1%	18.3%
10pm-midnight	1,647,345	1,522,487	8.2%	24.7%
midnight-1am	436,119	423,042	3.1%	13.2%
1am-2am	289,377	264,754	9.3%	22.1%

Note: 4 of the 6 stationery counters are on predominately retail streets

3. Consumer Demand and Feedback Perceptions

[1] Beauclair Sales Data
[2] Beauclair Sales Data
[3] Beauclair Sales Data
[4] MRI Footflow Data

3.1 The City Centre Team has commissioned consumer attitude/perception surveys on a five-year cycle, with the results of surveys of most relevance to this consultation being those from 2019 and 2024[5]. The consumers interviewed for these surveys are split into two groups; those who are regular visitors to the city centre and those who are not[6].

3.2 There has been a significant increase in the number of non-regular visitors coming into the city centre since 2019, the figure has risen from 32% to 51%.

3.3 In terms of 'going out' for leisure purposes there has been an increase in the number of people arriving in the city centre before 6pm, with a corresponding dip in people arriving between 7 and 8pm. The numbers arriving after this time are the same as those in 2019.

3.4 The picture in terms of going home shows increases in the number of people going home after 10pm in all time slots except 12 to 1am, which is markedly down from 20% to 12%. Importantly for the taxi/private hire trade, the number leaving after 1am is higher than in 2019.

3.5 Mode of transport choices for the journey home also show some big changes especially in train use for both visitors and non-regular visitors. From 2019 to 2024 access to the city centre by train has increased, bus use for non-regular visitors has dropped significantly and taxi use for both types of visitors has also dropped.

3.6 It should be noted that night bus services were withdrawn in July 2023 however were reinstated as part of a joint agreement by bus operators who recognised the importance to Glasgow's night-time economy. Despite the reintroduction, night bus routes do not cover an extensive network, are priced higher than standard bus fares and out with the Zonecard agreement.

3.7 Additionally, ScotRail services cease operations generally between 2300 and 0030 dependant upon the day and the Glasgow Subway closes at 2340. The lack of regular rail public transport after midnight leaves a gap in accessibility and transport for those who need to travel home from a night out or, for those employed in the night-time economy, home from work.

3.8 It is also important to acknowledge that the cost of using public transport has continued to rise across the UK and Glasgow has not been immune to these factors. After midnight, visitors to the city are faced with a higher cost to travel, on a limited number of modal options.

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5 Progressive Consumer Attitudes and Behaviours 2019 and 2024

6 Visitors are people who visit the city centre at least once every three months and consider it their preferred destination for a night out. Non visitors visit less often and consider another location their preferred destination for a night out.

3.9 For these reasons, public transport in general and taxis specifically have become more of a negative factor for people using the city centre. Between 2019 and 2024 negative sentiment from visitors, specifically around the availability of taxis, increased from 5% to 28% and for non-regular visitors from 16% to 28%.

4. Supply

4.1 There have been significant changes in the number of taxis and private hire vehicles and drivers operating in the city since 2019. The table below shows the changes when these matters were last formally considered by the council[7].

4.2 As can be seen from the table, the capacity of the taxi/private hire fleet has reduced by 11.5% and the number of drivers by 35%. This has reduced the ratio of vehicles per head of population.

Year	Taxis	PHCs	Total Fleet	Taxi Drivers	PHC Drivers	Total Drivers
2019	1420	3940	5179	2353	5475	7828
Jan 2023	1408	3176	4584	1756	3312	5068

4.3 As part of the report into Unmet Demand and Overprovision, the public survey identified that there had been a drop on the number of people using Taxis/Private Hire for evening or nighttime leisure, from 44% to 37.5%[8].

4.4 The survey also showed that the number of people who experienced no difficulties in securing a taxi, has fallen from 73% in 2018 to 40% in 2022.

4.5 Against the backdrop of an increase in sales in Food & Drink and Entertainment by 55% since 2019, the drop in the number of vehicles and drivers would appear to suggest that the reduced availability of taxi transport plays a part in inhibiting consumer behaviour for the NTE.

5. Conclusion

5.1 It is recognised that, in order to support the growth of the NTE economy and the cultural and creative sectors which it encompasses, it is important to have effective and reliable methods of transport to serve the city centre.

5.2 This opportunity to participate in a consultation, which will inform a decision whether to retain a limit on the number of taxis and private hire cars operating in the city, is considered proportionate and in the public interest and has come at an important time.

[7] Review and Assessment of the Demand for Taxi and Private Hire Cars in Glasgow. April 2023
[8] Review and Assessment of the Demand for Taxi and Private Hire Cars in Glasgow. April 2023

5.2 It is recognised that no single sector can provide all of the solutions. The CCTF Transport Sub-group is therefore seeking commitments to improvements in bus, subway and train availability and is working with transport operators to focus on;

- the availability of a choice of public transport modes;
- changes to the city centre locations where transport services can be accessed;
- ways in which journey ticketing can be improved; and
- addressing the public realm around transport hubs.

5.3 The NTE, including the creative and cultural sectors, is on a trajectory of growth which has brought significant economic advantages and in terms of the share of city centre spend is expected to continue to grow. The consumer perception survey highlights that improvements in transport availability would be an important factor in attracting people into the city centre,

5.4 The negativity of the perceptions around reliable transport for getting home, including the availability and cost of taxis and private hire vehicles has increased significantly and is considered to inhibit the recovery of the NTE.

5.5 For the reasons outlined above and in recognition of the fact that the removal of the limit on taxi and private hire is one of a number of transport related actions that are underway to improve the availability of public transport options to support the NTE, the City Centre Task Force supports the removal of the limit.

Yours sincerely

Councillor Angus Millar	Stuart Patrick
City Convener for Climate, Glasgow Green Deal, Transport and City Centre Recovery.	**Chief Executive Glasgow Chamber of Commerce**

From:
To:
Subject: FW: Evaluating Taxi and Private Hire Operation in Glasgow: A Data Driven Perspective (OFFICIAL - SENSITIVE: Commercial)
Date: 25 March 2025 16:14:14
Attachments: i

OFFICIAL - SENSITIVE: Commercial

From: Dougie McPherson
Sent: 25 March 2025 16:04
To: McDonald, Kenneth
Subject: Evaluating Taxi and Private Hire Operation in Glasgow: A Data Driven Perspective

Dear Mr. McDonald

I am pleased to share with you the attached report, **Evaluating Taxi and Private Hire Operation in Glasgow: A Data Driven Perspective**, which provides a comprehensive, evidence- based assessment of taxi and private hire provision in the City.

Glasgow Taxis undertook this research in advance of Glasgow City Council's intended consultation on taxi and private hire licensing policy. Our report presents crucial findings on fleet capacity, night-time economy challenges and key operational bottleneck. While referencing a range of sources, including the City Council and the Glasgow Chamber of Commerce, our research highlights:

- **Limited evidence of unmet demand** – Observational surveys at key city centre locations indicate that the limited wait times are driven by operational inefficiencies rather than a shortage of vehicles.

- **Broader transport and economic factors** – Declining footfall, gap in late night public transport (i.e., train, buses, subway) and the evolving behaviours of the public play a significant role in shaping demand.

- **Identified Improvements** – Rather than increasing taxi or private hire license numbers, targeted improvements such as enhanced rank infrastructure, better enforcement, and payment modernisation would all be impactful.

Given the significance of these findings, I encourage you to review the report and consider its implications as we navigate the future of Glasgow's transport landscape and the needs of the wider night-time economy.

I would welcome the opportunity to discuss the report with you at your convenience.

Regards,

Dougie

Evaluating Taxi and Private Hire Operations in Glasgow:

A Data Driven Perspective

(March 2025)

Glasgow taxis

Contents

Glasgow taxis

Executive Summary

This report provides an evidence-based assessment of taxi and private hire (PH) provision in Glasgow. It examines whether increasing the number of licensed vehicles is justified by actual demand. In doing so, it contrasts the views of the Glasgow Chamber of Commerce, which supports a removal of the cap on PH licences, with comprehensive analyses by both the City Council (2023) and Glasgow Taxis' own observational survey (2025).

Key Background & Context

- **Regulated Fleet Numbers:**
  Glasgow has maintained a regulated cap on licensed taxis and PH vehicles. Following the most recent increase in PH licences (approved in April 2023), the **total fleet has shown an 8.24% growth since 2008**.

- **Demand Assessment:**
  The report stresses that transport demand is influenced by broader factors. Both the Council's review and a 2022 Public Attitude Survey found **no widespread evidence of unmet demand**. Reported difficulties (approx. 12–13% of respondents) were typically linked to wait times and operational issues rather than a shortage of vehicles.

- **Night-Time Economy Factors:**
  Declining footfall, limitations in public transport during late hours, safety, and the evolving nature of the night-time economy mean that **issues of late-night travel extend beyond the simple availability of taxis or PH vehicles**.

Glasgow Taxis' Survey - Methodology & Findings

- **Observational Study:**
  A targeted Rank Survey was conducted at the Gordon Street taxi rank (Glasgow's busiest location) on four Saturday nights between January and February 2025.

- **Method:**
  Two observers recorded data from approximately 21:30 until 03:00 on nights chosen for varying conditions: severe weather, a pay-day effect, a special event (Valentine's weekend), and a normal Saturday. Continuous video verification was also used.

- **Results:**
  - Across all nights, between **530–570 taxis** served roughly **900–1,050 passengers**.
  - **Maximum wait times** were generally low (around 11 minutes), except during isolated peak periods (28 minutes on one night, 34 minutes on another).
  - Detailed observations confirmed that any **temporary queues were <u>not</u> due to a shortage of vehicles** but were primarily linked to operational factors such as traffic management, payment delays, and loading inefficiencies.

Industry Issues & Operational Challenges

- **Oversupply vs. Demand:**
  There is **<u>no</u> evidence to suggest significant unmet demand**. Instead, the industry is characterised by periods of excess capacity, as highlighted by both local survey data and the Council's review findings.

- **Operational Bottlenecks:**
  Instances of increased wait times were attributed to:
  - Inefficient traffic flow and queue management at key ranks.
  - Payment issues (e.g., some drivers not accepting card payments).
  - Occasional operational missteps, such as taxi driver misconduct.

- **Market & Workforce Concerns:**
  - ‘Flooding the market’ could further reduce driver earnings - a situation already under strain, as demonstrated by recent strikes among private hire drivers.
  - Many drivers are reluctant to work night shifts, meaning that simply increasing licence numbers may not translate to improved late-night service.

- **Environmental & Regulatory Considerations:**
  An uncontrolled increase in vehicle numbers may exacerbate congestion and environmental impacts, undermining initiatives such as the Low Emission Zone (LEZ) and other traffic management measures.

Recommendations

Rather than a blanket increase in licence numbers, the report advocates for a multifaceted, collaborative approach:

- **Taxi Rank Infrastructure Improvements:**
  A joint review (involving the Council, police, and operators) to optimise key taxi ranks, especially at Gordon Street.

- **Enforcement & Operational Efficiency:**
  Enhanced traffic and parking regulation enforcement around taxi ranks to reduce delays, coupled with better management and support from taxi marshals.

- **Payment Modernisation:**
  Mandate that all taxis and PH vehicles carry functioning card payment systems to improve transaction speed and passenger convenience.

- **Targeted Capacity Adjustments:**
  Consider introducing night-time specific licences that can increase capacity only during peak periods without affecting overall market balance.

- **Integrated Public Transport Solutions:**
  Align any transport strategy with broader improvements to late-night public transport services and infrastructure, ensuring a holistic approach to Glasgow’s evolving night-time economy.

Conclusion

The evidence suggests that Glasgow’s current regulated fleet is largely sufficient to meet demand during late-night hours. Short-term issues are largely operational rather than indicative of a structural shortage. The report strongly recommends that stakeholders focus on targeted, system-wide improvements, rather than increasing vehicle numbers, to ensure sustainable, efficient, and safe late-night transport provision.

1. Introduction

In late 2024, the Glasgow Chamber of Commerce advocated removing the cap on private hire car licences, arguing this would improve late-night transport options in the city. This position was put forward despite a comprehensive Glasgow City Council Review and Assessment of the Demand for Taxi and Private Hire Cars in Glasgow (2023), which had recently examined supply and demand for taxis and private hire cars.

In response to the Chamber's concerns and ahead of Glasgow City Council's upcoming consultation on taxi and private hire provision, Glasgow Taxis conducted a detailed analysis of taxi availability at a key city centre location.

This report presents the findings of that analysis, alongside relevant context from the Council's 2023 review and other sources, to provide an evidence-led assessment of whether increasing the number of cars is justified. The goal is to ensure that decisions around Taxi and PH provision are grounded in data and consider the full range of factors affecting Glasgow's night-time economy.

It should be noted that this Report is intended to form the basis of our response to the forthcoming consultation on taxi and private hire provision.

2. Background and Context

Glasgow has historically maintained a regulated limit on the number of licensed taxis (hackney carriages) and private hire cars (PH). ***The Council's most recent Review & Assessment of Demand for Taxi and Private Hire Cars (2023) found that Glasgow enjoys one of the highest levels of Taxi and PH availability per head of population in the UK.*** [1]

As of January 2023, the total combined fleet of taxis and private hires in Glasgow was 4,584 vehicles, up from 4,235 in 2008, an 8.24% increase. [2] This growth occurred even under the cap, ***indicating that fleet numbers have generally kept pace with demand through periodic adjustments.***

The 2023 Council report led to a decision in April 2023 by the Licensing Committee to modestly increase the PH licence cap. An additional 255 PH licences were approved. ***It is noteworthy that the Council's own study had recommended a smaller increase, on the order of 185 licenses, and explicitly advised against a larger expansion.*** [3]

The report concluded there was ***"…no current evidence to support increasing the [PHC] limit to 3,759 as this was previously found to represent an overprovision…"*** [4] In other words, raising the cap to former high levels would likely overshoot demand, undermining the viability of the trade. This conclusion was in line with the Council's duty to ensure an adequate but not excessive supply of vehicles.

Customer feedback gathered in the Council's review also did not indicate a widespread shortage of taxis or PH. In the Council's 2022 Public Attitude Survey (part of the 2023 demand assessment), ***12.1% of respondents reported having had difficulty obtaining a private hire car in Glasgow in the past year – virtually unchanged from 13% in a similar 2018 survey***. [5] This stability suggests that the perceived difficulty in getting a ride had not materially worsened, even before the recent modest increase in PH numbers.

Difficulties that were reported tended to be concentrated at peak weekend night hours and often were attributed to issues like wait times or no-shows, rather than an absolute lack of vehicles. These findings underscore that, on a broad city-wide basis, the supply of Taxis and PH has been sufficient relative to demand in recent years.

The periodic late-night transport challenges in Glasgow likely stem from other factors, which are explored next, rather than a fundamental shortage of licensed vehicles. The context in which Glasgow's night-time transport operates (including public transport availability, city centre conditions, and people's behaviour) is critical to understanding the issue.

3. Night-Time Economy Factors Affecting Transport Demand

Glasgow's night-time economy (NTE) is influenced by a complex interplay of factors beyond the number of taxis or private cars on the road. The Chamber of Commerce's own Glasgow City Centre Night-Time Economy Research (March 2024) emphasises that transport is just one component among many that shape people's decisions on where and when to go out.

While the Chamber's survey noted some public concern about difficulties in getting home late at night, it also referenced and highlighted other significant influences causing a negative perception of the city centre, on a par with transport factors such as overall safety, cleanliness, and the availability of alternative entertainment options.

The following findings in respect of public transport are noteworthy:

Visitors		
Transport	**Travel In**	**Travel Out**
Train	44%	30%
Bus	22%	15%
Taxi	8%	32%

Non-Visitors		
Transport	**Travel In**	**Travel Out**
Train	34%	20%
Bus	26%	11%
Taxi	10%	45%

One major factor is the availability of public transport at late hours. ***The Chamber's 2024 research found that a large share of people relies on trains and buses for evening travel, but these services wind down before the peak club and bar closing times.***

For example, in that survey, ***80% of city centre visitors (and 82% of non-visitors) expressed a desire for improved late-night train service, and extended operating hours for trains and buses*** was the most cited improvement that would encourage more visits (mentioned by 58% of visitors and 59% of non-visitors).

Many respondents who resorted to Taxis or PHs late at night did so simply because their preferred mode of travel (e.g. a train or bus) was unavailable at the time they needed it. Taxis and PH often fill the gap created by limited late-night public transport, rather than being the first-choice mode for most people leaving the city centre.

Overall demand for nightlife in the city centre has also been under pressure. According to the Council's 2023 review, ***"…footfall in Glasgow City Centre was at approximately 81% of levels experienced before COVID".*** [6] This corroborates other data: ***it was widely reported in mid-2024 that there were about 410,000 fewer visitors to Glasgow city centre in May 2024 compared to the same month in 2023.*** [7]

Such drops in footfall inevitably translate to fewer people seeking transport home in the late evening. Thus, ***while some argue that people are discouraged from coming into town because they worry about getting a taxi home, it is equally plausible that fewer people are out late at night due to broader trends in activity and preferences.***

- **<u>Societal and behavioural shifts are indeed playing a role.</u>**

  The after-effects of the COVID-19 pandemic, coupled with the ongoing cost-of-living crisis, have changed many individuals' habits. There is evidence of an emerging preference for different social patterns. For example, some people now go out earlier and return home before midnight, and a growing portion of especially younger adults are abstaining from alcohol-focused nightlife.

  A recent national survey ***by the Portman Group/YouGov found that 38% of UK drinkers now regularly consume low or no-alcohol beverages, and 39% of 18–24 year-olds report that they do not drink alcohol at all.*** [8] This was the subject of an STV news report on 16 January 2025. [9]

  It is also stated in discussions on the challenges in NTE that there is the need to 'return' the City Centre to previous levels. ***Perhaps it is necessary for us all to have an honest debate on whether City Centre's NTE continues to be "fit for purpose"*** and reflects the needs and expectations of all Glaswegians, especially the increasing proportion of the population who choose not to partake in the traditional experiences often inferred in in such discussions. ***In summary, the NTE may be evolving in ways that naturally reduce the strain on late-night transport as compared to years past.***

- **<u>Council policies and the competitive landscape also influence Glasgow's night scene.</u>**

  In recent years, Glasgow City Council has implemented measures such as the Low Emission Zone (LEZ) in the City Centre, increased parking charges, and extensive public realm works (e.g. the "Avenues" project). These initiatives have important long-term benefits but in the short term, they can make travelling into and around the City Centre less convenient, potentially pushing people toward other, more convenient locales.

- **<u>Other areas offer attractive evening destinations.</u>**

  For example, Glasgow's West End, Shawlands, and suburban centres like Braehead or Silverburn have become popular for dining and entertainment. Many of these areas are well-served by public transport or have ample parking, and they may draw would-be visitors away from the city centre. The Chamber's own research noted that respondents often cited positive experiences in these other localities, suggesting that Glasgow city centre is competing with both its own suburbs and other cities (like Edinburgh) for evening footfall.

Considering these broader factors, it becomes clear that simply increasing the number of taxis or private hire cars is not a panacea for the challenges of the night-time economy. Late-night transport issues must be viewed in context: demand is partly a function of how many people are out late, which in turn depends on public confidence in safety, the appeal of the city centre, and availability of other transport modes.

The next section turns to Glasgow Taxis' direct observational study, which provides data on how well the existing taxi fleet is currently serving the peak-period demand that does exist.

Glasgow taxis

4. Glasgow Taxis Rank Survey (2025)

To gather up-to-date, empirical evidence on taxi availability during peak night-time hours, Glasgow Taxis. undertook a focused Rank Survey in early 2025. This survey aimed to observe first-hand the level of service being provided by the existing fleet at one of the busiest locations and times for taxi demand.

4.1 Methodology

The study concentrated on the Gordon Street taxi rank at Central Station – widely recognised as the busiest taxi rank in Glasgow's city centre. This rank experiences heavy usage, especially on weekends, making it an ideal barometer for any supply shortages or excessive waiting times.

Four survey nights were selected:

Saturday 25 January, 1 February, 15 February, and 22 February 2025.

On each of these Saturdays, a team of two observers monitored the Gordon Street rank continuously from approx. 21:30 until 03:00 the next morning (Two of the nights began observation slightly earlier, around 21:00, to capture any early build-up in demand.)

These dates were chosen to cover a range of typical late-night scenarios: one followed a day of severe weather that shut down rail services (likely increasing taxi demand), one was the first payday weekend after the holidays, one coincided with a major event/holiday (Valentine's weekend), and one was a normal weekend with no special factors.

For verification, a continuous video recording was also made of the rank activity, allowing cross-checking of the manual observations. The data recorded included: the number of taxis departing the rank with passengers, the total number of passengers picked up, and the maximum passenger queue wait time observed during each half-hour interval.

4.2 Summary of Results

Table 1 below summarises the key metrics recorded on each of the four survey nights.

As shown, the volume of taxis servicing the rank and the number of passengers transported were high and relatively consistent across the nights, with only short-lived periods of notable waiting on two of the nights.

4.3 Observation Periods

The data obtained for analysis was collated from the observation of the Rank on the following days and times:

- **Saturday 25 January 2025, between 21.30 and 03:00**
- **Saturday 01 February 2025, between 21.30 and 03:00**
- **Saturday 15 February 2025, between 21.30 and 03:00**
- **Saturday 22 February 2025, between 21.30 and 03:00**

4.4 Data Analysis

The recorded data is summarised in the table below (see **Appendix A** for full data)

Date	Total Taxis Departing	Total Passengers	Max Passenger Wait Time	Notes
25 Jan 2025	558	897	11 mins	This date followed a significant storm, and all rail transport was cancelled.
1 Feb 2025	543	1047	28 mins (01:30 – 02:00)	This date represented the first 'pay day' post-Christmas weekend.
15 Feb 2025	566	1016	34 mins (00:30am – 01:00)	This date represented a special event weekend (Valentines Day) which is a key hospitality event day.
22 Feb 2025	529	1002	11 mins (00:00 – 00:30am)	This date represented a mid-month weekend night

As shown above, on all four nights the rank handled on the order of 530–570 taxis and around 900–1,050 passengers over the roughly 5.5-hour observation period. The busiest single night in terms of passenger pickups was 1 February (1,047 passengers), although 15 February saw slightly more taxi movements.

Notably, ***in three of the four samples, the maximum observed wait time for passengers was around 11 minutes or less,*** which indicates that for most of the night, passengers were able to get a taxi with minimal delay. The exception was 15 February, where a peak wait of approximately 34 minutes was recorded shortly after midnight. On 1 February, a wait of around 28 minutes was observed at its peak. These longer waits were very limited in duration, confined to specific 30-minute windows as noted. Even on those nights, once past the peak surge, waiting times dropped back to 5–10 minutes or less.

It should also be emphasised that zero passenger waiting was recorded for significant portions of each night **(denoted by "N/A" or 0 in the detailed logs)**, and on 22 February in particular, the queue cleared completely at one point – observers noted the rank was entirely empty of waiting passengers around 01:40, meaning supply temporarily exceeded demand.

4.5 Key Findings

The detailed observations from the Gordon Street rank survey reveal several important findings:

- <u>**Taxis generally met demand:**</u>

  At no time was there an absence of taxis available at or near the rank.

  Even during the periods when a passenger queue formed, there were taxis present on the rank or waiting in the feeder lane on Hope Street. The instances of passenger waiting were not due to a lack of taxis in the vicinity, but rather the speed at which those taxis could be processed and loaded.

- **<u>Causes of peak wait times were operational:</u>**

  Investigations into the two nights with notable wait periods (1 Feb and 15 Feb) showed that the maximum wait times were caused by factors other than an insufficient number of taxis. Specifically, observers noted bottlenecks such as poor traffic management around the rank (e.g., clogged lanes preventing taxis from moving up), delays due to some drivers not accepting card payment (leading passengers to skip the first taxi in line), fare negotiations between drivers and groups of passengers, and occasional instances of taxi driver misconduct (e.g. leaving the rank out-of-turn). These issues sometimes slowed down the loading of taxis, allowing a queue to build despite plenty of taxis being nearby and willing to pick up passengers.

- **<u>Rank capacity, not fleet size, was the limiting factor:</u>**

  The consistency in the numbers across all four nights (each night delivered roughly the same passenger throughput despite differing external conditions) indicates that the capacity of the rank itself (and the street/network conditions around it) largely determined performance, rather than the absolute number of taxis available. In other words, adding more taxis beyond the numbers already in circulation would likely not have increased the number of trips provided in those hours, because the rank and road constraints were the governing factor.

- **<u>Role of Taxi Marshalls</u>:**

  The presence of Taxi Marshals on Gordon Street was noted as a positive influence. Marshalls helped manage the queue and direct passengers, contributing to safety and order. However, the surveyors saw significant scope for improvement in marshal operations and overall rank management. More proactive coordination could have reduced delays (such as guiding taxis promptly from the feeder rank or assisting with quick loading of large groups).

- **<u>External disruptions</u>**:

  Non-transport issues also affected the rank environment. On 22 February (a comparatively quieter night in terms of wait times), there were three separate incidents of street fighting and disorder in the immediate vicinity of the rank, along with a generally rowdier, younger crowd that night.

  Disturbances can dissuade some taxi drivers from staying in the area or can slow operations, and they also highlight that improving the late-night city centre experience involves more than just transport provision.

- **<u>Alignment with city-wide data:</u>**

  The survey's findings align closely with the Council's 2023 city-wide taxi supply analysis. The Council's study found that across Glasgow, ***"… for 90.2% of the time, the balance and demand for taxis in Glasgow is either at equilibrium (72.6%) or in a state of excess supply (17.6%)"*** [1]

  Our rank observations reflect this: most of the night there was equilibrium or surplus taxis (no queue), with only short periods where demand transiently exceeded supply. ***This localised study reinforces the broader conclusion that there is no persistent unmet demand for taxis under current fleet levels.***

In summary, ***the rank survey provided clear evidence that the current number of taxis in Glasgow is generally adequate even at peak weekend times***, and that the occasional issues observed are largely due to situational factors (traffic flow, payment processes, and passenger behaviour) rather than an inherent shortage of vehicles. With targeted improvements (discussed later in this report), even those brief waiting periods could potentially be reduced.

5. Industry Issues Impacting Taxi & PH Service

While the data indicates that adding more taxis or private hires is not a silver-bullet solution, it is also important to recognise the challenges and dynamics within the Taxi and PH industry that affect service levels. Any policy changes must account for these factors:

- **Market Saturation:**

  There is no clear evidence of significant unmet demand city-wide; if anything, the evidence points to sufficient or excess supply most of the time. ***Glasgow already has one of the largest Taxi and PH fleets per capita in the country.*** [11] Introducing many additional licences could oversaturate the market, leading to oversupply which would likely result in diminishing returns for drivers and vehicles spending more time idle.

- **Driver Earnings and Industrial Action:**

  When the supply of cars outstrips passenger demand, driver incomes fall. This is not just a theoretical concern – it is happening in practice. Recently, private hire drivers across the UK (including Glasgow) have engaged in strikes and protests over low pay. For example, ***on 14 February 2025, hundreds of app-based private hire drivers staged a coordinated strike, with their union noting that many must work 70–80 hours a week under current conditions to make ends meet.*** [12]

  This kind of industrial action ("It's hard to survive," as one campaign put it) underscores that drivers are already struggling financially. Flooding the market with even more vehicles could exacerbate this situation, forcing drivers to endure brutal hours or abandon the trade entirely. In short, what might look like an increase in supply on paper could reduce the availability of experienced drivers (if earnings drop too low to retain them).

- **Shift Patterns and Staffing:**

  Late-night taxi availability is not the number of vehicles licensed, but how they are operated. Historically, many Glasgow taxis (and PH) were double shifted. However, post-pandemic realities, an aging driver workforce, and increased operating costs (such as those due to LEZ compliance) have led to more vehicles being single shifted.

  Fewer cars are on the road late at night than the licence figures alone would suggest. Simply issuing new licences may not solve this if the industry cannot attract drivers for night shifts. Many new licensees might also choose to work only during profitable daytime or early evening hours. The constraint, therefore, is partly one of labour supply and preferences, not just vehicle count.

- **Environmental Considerations:**

  Introducing additional vehicles into the city carries environmental and traffic implications. Glasgow City Council's introduction of the Low Emission Zone has rightly aimed to improve air quality, but compliance has been costly and detrimental to every taxi operator in the City, especially on account of the increased cost of running the vehicles while investing heavily to upgrade or retrofit vehicles (note: the cost of a new LEZ-compliant taxi is approx. £74,000).

  Adding more taxis or PH could increase congestion and emissions, counteracting the goals of policies like the LEZ. Moreover, the city is actively exploring measures to reduce traffic in the centre – for instance, ***proposals for a congestion charge and even tolls on the Clyde Tunnel have been floated in early 2025 as ways to curb traffic and raise revenue***. [13]

In summary, the Taxi and PH trade in Glasgow is a delicate ecosystem. Overloading it with new licenses could undermine driver livelihoods and service quality. The operational reality is that when and how drivers choose to work is as important as how many vehicles are licensed. Any strategy to improve late-night transport should therefore focus not only on numbers but also on optimising conditions for the existing fleet to be used effectively.

6. Recommendations

Both the data and broader analysis in this report indicate that simply increasing the number of Taxi or PH cars is not the appropriate solution to Glasgow's late-night transport challenges. The current cap on licences, recently adjusted in 2023, appears to be grounded in evidence and aligns with the observed demand levels. ***The comprehensive 2023 Council review found no significant unmet demand, and Glasgow Taxis' own rank survey in 2025 further confirmed that, most of the time, supply meets demand well*** – and when it doesn't, the causes are remediable through management and infrastructure improvements rather than just vehicle count.

Removing or substantially raising the cap at this time could lead to unintended negative consequences: driver incomes could fall, service could deteriorate due to inexperienced or part-time entrants, and increased congestion could hamper the very goal of faster dispersal of people from the city centre. Moreover, if the fundamental issue is that people cannot find a means to get home at 02:00. adding more vehicles is only one way (and arguably not the most sustainable way) to address that.

A holistic approach is required, involving later public transport options, better rank management, and collaborative solutions that make better use of the resources we already have. With that in mind, this report puts forward the following recommendations to improve late-night transport efficiency and safety in Glasgow, without resorting to uncontrolled increases in taxi or PH numbers:

- **<u>Review and Improve Taxi Rank Infrastructure:</u>** Conduct a joint review (involving the Council, police, and taxi operators) of key city centre taxi ranks. The aim would be to identify physical or operational improvements to enable taxis to load and depart more efficiently during peak periods, e.g. optimising the Gordon Street rank flow, given its strategic importance,

- **<u>Strengthen Enforcement of Traffic and Parking Regulations</u>:** Ensure strict enforcement against illegal parking or stopping in the vicinity of taxi ranks, especially during weekend night peaks. Dedicating enforcement officers to keep crucial pick-up points clear during peak hours can greatly improve access and reduce delays. Likewise, continued enforcement against unlicensed or touting drivers protects legitimate trade and public safety.

- **<u>Mandate Card Payment Facilities in All Taxis and PH</u>:** Introduce a requirement that all licensed taxis and private hire cars in Glasgow must carry a functioning credit/debit card payment device. Lack of a card option was noted as a factor causing delays and frustration at the rank. This move would bring Glasgow in line with best practices in other major cities and improve customer confidence in using taxis.

- **<u>Enhance Signage and Public Awareness:</u>** Improve the visibility and awareness of late-night transport options through better signage, information campaigns, and technology. Physical signage in the city centre should clearly direct people to the nearest taxi ranks.

- **<u>Introduce Night-Time Specific Licences if Needed:</u>** These would be special licences that could inject additional capacity only when and where it's needed, without oversaturating daytime operation or the overall market. This approach would attract operators specifically interested in serving the late-night market and ensure that any increase in numbers directly targets the problem times.

- **<u>Align Policy Changes with Trade Recovery:</u>** Ensure any major decision on licence numbers carefully considers the current state of the trade and recent investments by operators. Glasgow's taxi fleet has just undergone significant turnover to meet LEZ requirements, incurring substantial costs. The trade should be allowed to stabilise and recover In essence, avoid drastic changes during a period when the industry is adapting to other mandated changes, to not undermine the viability of operators who have shown commitment to providing a compliant and quality service.

7. Conclusion

Glasgow's late-night transport challenges can be most effectively addressed through a combination of targeted improvements and collaborative efforts rather than a blanket increase in vehicle numbers. Glasgow Taxis. urges all stakeholders; the City Council, the Chamber of Commerce, police and transport authorities, and the Taxi and PH trade itself, to work together on the above recommendations.

By doing so, the city can enhance the safety, reliability, and convenience of late-night travel for the public, while also ensuring that the Taxi and PH industry remains sustainable, and drivers can earn a reasonable livelihood. This balanced approach will support Glasgow's night-time economy and hospitality sector as it continues to recover and evolve in the coming years.

Appendix A: Detailed Rank Observation Data

The following tables present the detailed half-hourly data collected during the Glasgow Taxis Gordon Street rank observations.

Each table corresponds to one Saturday night, showing the number of taxis that departed with passengers, the total number who boarded taxis, and the maximum wait time observed. Intervals where no significant queue formed are denoted as N/A (not applicable) for wait time.

Observation Night 1 | Saturday 25 January 2025 (9:30 PM – 3:00 AM)

Conditions: Severe weather earlier
(All train services were cancelled, likely increasing taxi demand)

TIME	TOTALS	WAIT TIME
2100 - 2130	Taxis	0 mins
	Pass	
2130 - 2200	Taxis 27	0 mins
	Pass 60	
2200 - 2230	Taxis 48	0 mins
	Pass 77	
2230 - 2300	Taxis 52	0 mins
	Pass 92	
2300 - 2330	Taxis 51	5 mins
	Pass 103	
2330 - 0000	Taxis 54	0 mins
	Pass 68	
0000 - 0030	Taxis 56	7 mins
	Pass 90	
0030 - 0100	Taxis 51	8 mins
	Pass 92	
0100 - 0130	Taxis 63	11 mins
	Pass 85	
0130 - 0200	Taxis 47	0 mins
	Pass 82	
0200 - 0230	Taxis 59	0 mins
	Pass 71	

0230 - 0300	Taxis 50	0 mins
	Pass 77	
Totals	**Taxis**	**558**
	Passengers	**897**

Totals: *558 taxis, 897 passengers. The longest waiting time observed was approx. 11 minutes.*

Glasgow taxis

Observation Night 2 | Saturday 1 February 2025 (9:00 PM–3:00 AM)

Conditions: *First payday weekend after the Christmas/New Year period (Higher patronage expected).*

TIME	TOTALS	WAIT TIME
2100 - 2130	Taxis 23	0 mins
	Pass 29	
2130 - 2200	Taxis 40	0 mins
	Pass 77	
2200 - 2230	Taxis 55	0 mins
	Pass 127	
2230 - 2300	Taxis 46	0 mins
	Pass 108	
2300 - 2330	Taxis 53	9 mins
	Pass 111	
2330 - 0000	Taxis 53	9 mins
	Pass 96	
0000 - 0030	Taxis 59	10 mins
	Pass 115	
0030 - 0100	Taxis 43	14 mins
	Pass 107	
0100 - 0130	Taxis 46	14 mins
	Pass 76	
0130 - 0200	Taxis 38	28 mins
	Pass 58	
0200 - 0230	Taxis 37	15 mins
	Pass 57	
0230 - 0300	Taxis 50	13 mins
	Pass 86	
Totals	**Taxis**	**543**
	Passengers	**1047**

Totals: *543 taxis, 1,047 passengers. The longest waiting time (approx. 28 minutes) occurred between 01:30–02:00, after which the queue cleared rapidly.*

Observation Night 3 | Saturday 15 February 2025 (9:00 PM–3:00 AM)

Conditions: *Valentine's Day weekend*
(Key hospitality event: high activity at restaurants, events, etc.)

TIME	TOTALS	WAIT TIME
2100 - 2130	Taxis 39	0 mins
	Pass 73	
2130 - 2200	Taxis 55	0 mins
	Pass 102	
2200 - 2230	Taxis 50	0 mins
	Pass 100	
2230 - 2300	Taxis 36	0 mins
	Pass 71	
2300 - 2330	Taxis 66	0 mins
	Pass 122	
2330 - 0000	Taxis 61	5 Mins
	Pass 107	
0000 - 0030	Taxis58	7 – 17 mins
	Pass 91	
0030 - 0100	Taxis 59	34 mins
	Pass 111	
0100 - 0130	Taxis 53	4 mins
	Pass 97	
0130 - 0200	Taxis 32	2 mins
	Pass 48	
0200 - 0230	Taxis 36	0 mins
	Pass 51	
0230 - 0300	Taxis 21	0 mins
	Pass 43	
Totals	**Taxis**	**566**
	Passengers	**1016**

Totals: *566 taxis, 1,016 passengers. A maximum wait of ~34 minutes was observed just after midnight when demand peaked sharply; the queue then diminished. (During the 00:00–00:30 interval, waits started around 7 minutes and briefly grew longer, up to ~17 minutes, before the peak at 00:30–01:00.)*

Glasgow taxis

Observation Night 4 | Saturday 22 February 2025 (9:00 PM–3:00 AM)

***Conditions**: Typical mid-month Saturday night.*
(No special events/characteristics)

TIME	TOTALS	WAIT TIME
2100 - 2130	Taxis 43	0 mins
	Pass 89	
2130 - 2200	Taxis 46	0 mins
	Pass 94	
2200 - 2230	Taxis 49	3 mins
	Pass 89	
2230 - 2300	Taxis 53	3 mins
	Pass 93	
2300 - 2330	Taxis 44	5 mins
	Pass 91	
2330 - 0000	Taxis 53	5 mins
	Pass 94	
0000 - 0030	Taxis 50	11 mins
	Pass 87	
0030 - 0100	Taxis 48	10 mins
	Pass 92	
0100 - 0130	Taxis 46	9mins
	Pass 97	
0130 - 0200	Taxis 32	0 mins (01:40 rank totally empty)
	Pass 50	
0200 - 0230	Taxis 30	9 mins
	Pass 76	
0230 - 0300	Taxis 35	6mins
	Pass 50	
Totals	**Taxis**	**529**
	Passengers	**1002**

***Totals:** 529 taxis, 1,002 passengers. The longest wait at any point was about 11 minutes. Notably, at around 1:40 AM the passenger queue dropped to zero (no wait), indicating supply exceeded demand at that moment despite the busy night.*

Appendix B: References & Citations

Glasgow City Council: Review & Assessment of Demand for Taxi and Private Hire Cars (2023):

1. Section 2.1.17 – Impact assessment of taxi demand.
2. Section 2.1.2 – Key findings on taxi and PHC service provision.
3. Section 9.2.6 – Policy recommendations and market regulation.
4. Section 8.4.9 – Licensing cap review and overprovision considerations.
5. Section 4.3.1 (Q21) – Public Attitude Survey: Difficulty obtaining a taxi or PHC.
6. Section 3.1.5 – City Centre Recovery Dashboard: Footfall analysis.
10. Section 3.3.1 – Supply and demand balance over surveyed periods.

News & Industry Reports:

7. BBC News Scotland (2 July 2024) – *Significant challenges for Glasgow as footfall drops by 400,000*.
9. STV News Report – *Glasgow night-time economy challenges* (Available upon request).
12. The Guardian (14 February 2025) – *UK Private Hire Drivers are Striking on Valentine's Day*.
13. Glasgow Times (19 February 2025) – *Toll charge for Clyde Tunnel being considered by council*.

Surveys & Industry Studies:

8. Portman Group / YouGov Survey Report (2024) – Consumer trends in alcohol consumption.

END

From: [redacted]
To: Licensing Enquiries
Subject: Taxis
Date: 28 March 2025 10:39:14

In my view the numbers of Uber taxis should be limited
Traditional black cabs cater for the disabled, those with luggage, groups in ways that Uber and other ordinary cars cannot .
Black cabs cost c.£70k . They are reliable and generally safer. They should be encouraged

.on the occasion when I had to take an Uber taxi from the QE hospital the driver was not a licensed taxi driver, did not know the route and ignored my instructions.

J m h Charsley
[redacted]

From: [redacted]
To: Licensing Enquiries
Subject: Private hire under provisions at night
Date: 21 March 2025 17:33:45

How do I submit an idea to the consultation process for the unmet demand at night within the city centre given that no new licences are available.
I'd like to suggest a night time coloured plate(say lilac) to stand alone from the traditional yellow 24 hour plate.
Taxi apps can be reconfigured to only allow lilac plates to operate between 6pm to 6am.
This would mean the council could issue licences to those who only wanted to work during those times.
Given that taxi apps can change fare structures to reflect the time of hire I'm sure it would be very simple to get companies to set time limits.
It's just an idea. It'll probably be ignored but at least I'm trying.
Regards
Matthew Cotter
Glasgow resident

From: [redacted]
To: Licensing Enquiries
Subject: Over provision of Private Hire Cars and Unmet Demand of Taxi Services
Date: 22 March 2025 19:05:55

Dear Sir

I live in amenity flats in the Woodlands end of Glasgow City. I am elderly disabled and regularly use Black Cabs if Glasgow Taxi Association.

There are not enough Black Cabs available for hire, and I frequently wait 30-50 minutes for a taxi. I can no longer plan medical appointments before 10am as I cannot get a hire, even when I book in advance. The same can be said for trying to use cabs between 3pm-5pm. I use Black Cabs as they are able to accommodate my walking frame and driver's more than happy to help me in and out of cab. I no longer go out in the evening as I have frequently been stuck on street corners for over an hour trying to get a black cab. There are just not enough of them.

I no longer use private hire taxis as I have repeatedly found them unwilling to help with drivers keeping live phone conversations going, not getting out of cab to deposit my folding walking frame to car boot, or bags of shopping, they open the boot but want me to fold and lift the walking frame myself.

Please increase the number of black cabs to the City of Glasgow. They are a company whose driver's I trust.

Kind regards

Morag Lau
[redacted]

Yahoo Mail – Email Simplified

From: [redacted]
To: Licensing Enquiries
Subject: Removal of the cap on Private Hire Cars in Glasgow
Date: 22 May 2025 16:54:30

To whom it may concern,

Otto Car has the largest fleet of private hire vehicles in the UK.

We support the removal of the cap on Private Hire Cars in Glasgow to support the city centre economy, businesses, cultural assets and public safety. If the cap was removed, Otto Car would feel more confident in establishing operations in Glasgow to support local private hire drivers.

Thank you

Phill Burton
Co-CEO, Otto Car

[redacted]

[redacted]

From:	[redacted]
To:	Licensing Enquiries
Subject:	Letter FAO Licensing Enquiries - Submission on consultation on overprovision of private hire cars and unmet demand of taxi services
Date:	27 May 2025 16:52:51
Attachments:	[redacted]

Dear Licensing
Please find attached letter from Cllr Susan Aitken, for your attention.
Regards
Pauline

On behalf of Councillor Susan Aitken
Scottish National Party (SNP)
Leader of the Council
Ward 7 Langside
[redacted]

Councillor Susan Aitken
Scottish National Party
LANGSIDE - WARD 7
Leader of the Council
Phone: [redacted]
E-mail: [redacted]

Our Ref: SA/PS/0527/LICE
27 May 2025

Licensing Enquiries
Glasgow City Council
City Chambers
George Square
Glasgow G2 1DU
By email only: LicensingEnquiries@glasgow.gov.uk

Dear Licensing Enquiries,

Please consider the following submission to the Licensing Committee's consultation on overprovision of private hire cars and unmet demand of taxi services.

Glasgow city centre and its night-time economy provision are critical to Glasgow's prosperity, vibrancy and identity. Indeed, the recent reports by international consultants Resonance which ranked Glasgow prominently in the list of the world's best cities explicitly referenced our nightlife and music scenes.

However, changing consumer patterns, the lasting impact of the global pandemic and the inflationary and cost-of-living crises have had a profound impact on the city centre and night-time economy.

Recent studies commissioned by the City Centre Taskforce highlighted a lack of public confidence around the reliability and availability of late-night transport. The reports have also indicated that improvements in transport availability could attract more people into the city centre and encourage them to remain in town until later in the evening.

While Glasgow City Council has limited influence on late-night public transport provision, there is a perception, supported by the evidence within the commissioned reports, that the authority's policy limiting the number of taxi and private hire licences operating in the city since 2019 has contributed to the lack of availability of transport options and, as a result, detrimentally impacts on city centre evening footfall.

It is my view that in order to support the revitalisation of Glasgow city centre and its evening and night-time economies, we must not only have a spread of reliable transport options but that we must also address public concerns around unreliability and unavailability.

It is also my view that the City Council should prioritise actions which are in its gift to address and to use all available levers to improve reliability and availability within the taxi and private hire fleets, particularly in the later part of the evening.

To that end, I support the removal of the current limits on taxi and private hire licences operating within the city.

/…

It is my belief that the changes that have taken place within the sector and across our economy since the introduction of the policy limiting the number of private hire car licences mean that the policy is no longer appropriate and should be withdrawn.

It is my understanding that a significant number of private hire car drivers will have obtained licences to allow for additional sources of income and employment flexibility but that this does not mean that they are currently operating as drivers and contributing to the needs of the city.

I would further support the exploration of conditions which could require a sufficient level of evening, late night and weekend taxi and private hire provision to meet the city centre's needs.

Furthermore, where the relationship between taxi or private hire firms and licence holders is that of employee and employer, there may be scope within that relationship to encourage increased and improved late night availability.

In conclusion, while it is evident that a number of complimentary transport-related actions are required to improve the availability of city centre public transport choices, I am of the view that the removal of the limit on private hire licences is one of actions.

Yours sincerely

[redacted]

Councillor Susan Aitken
Leader of the Council

From:	[redacted]
To:	Licensing Enquiries
Subject:	Uber / Response to the Overprovision of Private Hire Cars and Unmet Demand of Taxi Services 2025
Date:	27 May 2025 16:18:39
Attachments:	[redacted]

Dear Glasgow Licensing Team

Please find attached Uber's response to the Overprovision of Private Hire Cars and Unmet Demand of Taxi Services.

Please kindly confirm receipt of this email and attachment.

Yours sincerely.

--
Matthew Freckelton
Head of Cities, UK
[redacted]

Uber

Uber

Uber Britannia Ltd
First Floor
Aldgate Tower
2 Leman Street
London, E1 8FA
United Kingdom

27 May 2025

Response to Overprovision of Private Hire Cars and Unmet Demand of Taxi Services

Submitted by email to LicensingEnquiries@glasgow.gov.uk

Dear Glasgow City Council

Thank you for the opportunity to contribute to the Council's review of its overprovision policy for taxis and private hire cars in Glasgow. Uber welcomes this consultation and wishes to **formally advise against the continuation of the cap on Private Hire Car (PHC) licences. We firmly believe that removing the cap in its entirety will better serve Glasgow's residents, visitors, drivers, and businesses.** In this response, we outline the cap's negative impacts on riders and drivers – including the night-time economy and public safety – and present evidence from other cities that have thrived without such caps. We also highlight Uber's data on the effects of Glasgow's cap (e.g. increased wait times and unfulfilled trips, especially at transport hubs and events) and address common misconceptions about congestion and air quality. We urge the Council to **remove the cap** in order to improve service, enhance competition, and support broader city goals.

Impact of the PHC Cap on Riders, Drivers, and the City

Glasgow is currently the **only city in the United Kingdom** that imposes a hard limit on the number of PHCs that are licensed. The cap (3,450 PHCs, alongside 1,420 taxis) has resulted in a well-documented **shortage of vehicles during peak times**[1]. This shortage harms riders, drivers, and the vitality of the city in several ways:

Longer Wait Times and Unmet Demand: With PHC licences artificially capped, there are not enough cars to meet growing demand, especially at busy periods. **Uber's data shows that passengers in Glasgow now wait on average 300% longer for a PHC at peak night-time hours compared to Edinburgh or Manchester (cities with no cap).** Riders frequently face extended waits or cannot get a car at all during weekend evenings and other high-demand

[1] Glasgow taxi and private hire limit to be reviewed amid late-night transport concerns | STV News

periods. In 2024, over **6,000 trip requests went unfulfilled during major events** (e.g. concerts at the Scottish Events Campus/OVO Hydro) because no PHC was available to meet the demand. Such outcomes may leave customers stranded, frustrated and unsafe.

Uber's data also shows growing demand for the Uber product displacing myths from other local operators that there is decreasing demand. Demand for the Uber product was **47% higher in Q1 2025** when compared with **Q1 2019**. When the last review of the cap was conducted in 2022, demand for the Uber product was up **19% YTD in 2022**. This is in stark contrast to the number of the PHCs available with the cap **increasing by only 7.81%** (the vehicle cap increasing to 3,450 in April 2023). Regularly; demand is outstripping supply in Glasgow.

Graph 1: Glasgow: Cumulative trip requests 1st January

Public Safety and the Night-Time Economy: The cap is undermining Glasgow's night-time economy by making it difficult for people to get home safely after an evening out. Late-night visitors – who fuel Glasgow's hospitality, music, and entertainment sectors – **struggle to find available rides home due to the lack of PHCs and taxis at night**. Academic research commissioned by the Council itself found that anxieties over securing a ride home are deterring people from visiting the city centre in the evening[2]. This is not just an inconvenience but a **public safety concern**: when legitimate transport is unavailable, people may take risks such as walking alone at night or resorting to unlicensed (and unsafe) operators. Indeed, evidence submitted to Parliament has warned that using licensing caps to restrict supply can drive demand to illegal taxis, **exposing consumers to greater safety threats**. Removing the cap will help ensure those enjoying Glasgow's night-life can reliably get a safe ride home, which in turn

[2] Glasgow taxi and private hire limit to be reviewed amid late-night transport concerns | STV News

encourages more patronage of bars, restaurants, theatres and other venues[3]. In short, plentiful late-night transport is essential to a thriving, safe night-time economy.

Occasion	Glasgow	Edinburgh	Manchester
Night (00:00>06:00)	27%	24%	15%
Morning (06:00>12:00)	10%	12%	4%
Afternoon (12:00>18:00)	14%	14%	7%
Evening (18:00>00:00)	18%	13%	11%

Table 1: % of non-completed trip requests. 1 April 2024 > 31 March 2025

Occasion	Glasgow	Edinburgh	Manchester
Night (00:00>06:00)	7%	8%	3%
Morning (06:00>12:00)	10%	11%	3%
Afternoon (12:00>18:00)	12%	11%	4%
Evening (18:00>00:00)	8%	16%	3%

Table 2: % of trips actual time of arrival of over 10 minutes. 1 April 2024 > 31 March 2025

Event / Venue	% non completed trips
Halloween Club Nights	
AXM / 3-4 Nov 2024	37%
Garage / 27-28 October 2024	46%
SWG3 / 27-28 October 2024	57%
Events at the Hydro	
Hydro / 8-9 March 2025	30%
Hydro / 11-12 March 2025	30%
Pay Day Weekends	
Finnieston / 11 No - 1 Dec 2024	27%
Royal Exchange Square / 11 Nov - 1 Dec 2024	34%

[3] Glasgow taxi and private hire limit to be reviewed amid late-night transport concerns | STV News

West End Ashton Lane Square / 28 Feb - 2 March 2025	25%

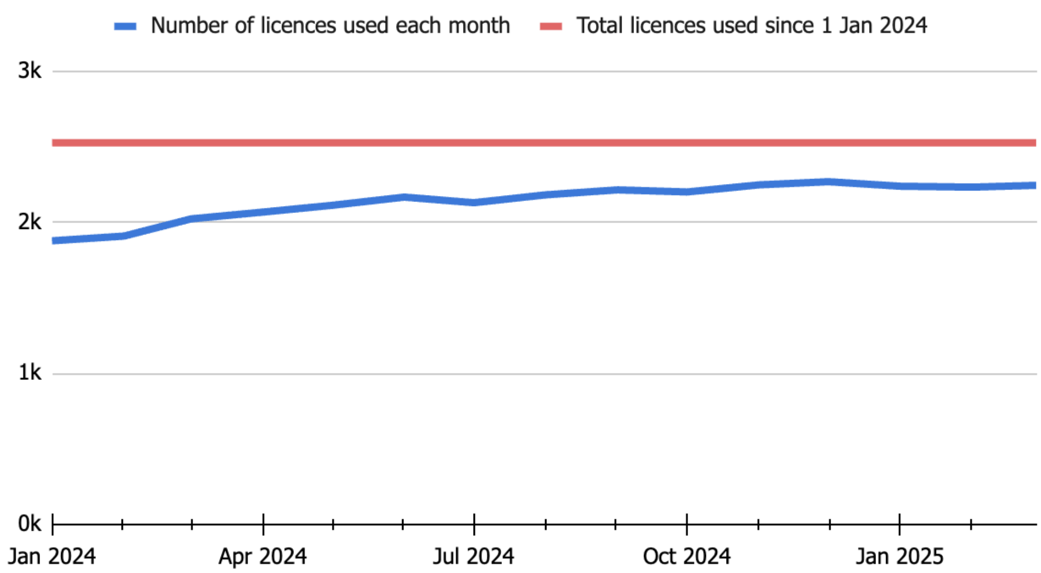
Table 3: % of non completed trips at key venues in Glasgow. 1 April 2024 > 31 March 2025

Underserved Communities and Outlying Areas: Caps disproportionately hurt **underserved communities**. When vehicle numbers are limited, drivers naturally gravitate toward the busiest, most profitable areas (city centre and major transport hubs) to find fares. This leaves outlying residential areas and smaller communities with poor service – the very neighborhoods that often lack alternatives and rely most on affordable PHC options. The arrival of app-based PHC services helped address gaps in taxi coverage across certain parts of cities, a situation that improved when Uber and others increased supply and broadened coverage. Maintaining a capped-supply status quo means those outside the city core face longer wait times or no service at all. A supply cap effectively **penalises late-night workers and residents in peripheral districts**, who may finish work or social engagements after public transit has stopped and depend on PHCs for their commute. In Glasgow, one-third of all PHC trips involve a transport hub (like a railway station, bus terminus or the airport) – demonstrating how crucial PHCs are in connecting communities to key transit points. Yet in 2024 alone, **24,500 ride requests at Glasgow's railway stations went unfulfilled due to insufficient PHC supply**. Such gaps leave shift workers and travellers with limited options. Removing the cap will allow more drivers to serve these needs, improving equitable access to transportation across all parts of the city.

Location	Total unfulfilled trips
Railway Stations	
Glasgow Central Station	23,300
Edinburgh Waverley Station	4,600
Manchester Piccadilly Station	8,100
Airports	
Glasgow Airport	21,400
Edinburgh Airport	14,600
Manchester Airport	700
Major Venues	
Glasgow SEC + OVO Hydro	8,100
Edinburgh Corn Exchange (O2)	400
Manchester AO Arena	2,500

Table 4: Total number of unfulfilled trip requests. 1 April 2024 > 31 March 2025

Driver Opportunities and Welfare: The cap also negatively impacts licensed drivers (and those who wish to become drivers). With a fixed number of vehicle licences, new drivers who could be appropriately licensed and ready to work are **shut out of the market**. This creates a barrier to entry and artificially favours incumbent operators. In some cities, strict caps have led to costly "medallion" systems where a licence itself becomes exorbitantly expensive, saddling drivers with heavy debts or lease fees. While Glasgow's PHC cap has not created a full medallion trading system, the principle is similar – restricting supply tends to drive up the value (or cost) of a licence on the secondary market, which ultimately means higher costs for working drivers and fewer individuals able to afford to enter the trade. By lifting the cap, the Council would **enable more aspiring drivers to enter** the sector, bringing new job opportunities. Importantly, increased competition for trips would not necessarily hurt driver earnings: as detailed below, evidence from numerous jurisdictions finds **no evidence that drivers earn more in capped markets** – instead they often work longer, less flexible hours for only marginally better returns. Uber's experience shows that demand grows in response to the growth in supply of PHCs (the flywheel) and more supply picks up latent demand, **drivers benefit from more trip opportunities and can choose more flexible schedules**, rather than being constrained by an artificially scarce pool of licences. We also see no evidence of drivers sitting on licences; i.e. being a licensed driver but then conducting little to no work. We in fact see the opposite with almost all licensed drivers being active on the road in Glasgow each month.



Graph 2: Glasgow: How many licences are used by drivers each month

In summary, the current cap has led to **longer wait times, unmet rides, and reduced mobility** for the public. It harms the very people it was meant to protect (drivers and riders) by constraining supply and competition. Glasgow's own review last year already found **"unmet**

demand" for taxis and evidence of "potential underprovision" of PHCs at peak times [4], prompting a modest increase of 255 PHC licences. Those measures, however, fell short of what is needed – a full removal of the cap – to resolve the chronic shortage. The Chamber of Commerce and city centre stakeholders such as night-time economy leaders have called for scrapping the cap in order to boost the night-time economy. Uber strongly agrees: **the cap's unintended consequences are undermining rider experience, public safety, and economic recovery**. Lifting this cap will allow supply to adjust dynamically to demand, ensuring people can get a ride when and where they need one. This is even more important now it is confirmed that Glasgow will host the **2026 Commonwealth Games** where there will be a significant spike in demand during the daytime and nighttime.

Evidence from Other Cities Without Caps

Glasgow's situation is not unique – cities around the world have grappled with whether to limit taxi and PHC numbers. The overwhelming trend has been **toward removing or avoiding caps** in favour of open entry, given the proven benefits to consumers. **Where caps have been lifted or not imposed, riders enjoy better access (shorter wait times, more availability), and drivers enjoy greater flexibility and earning opportunities**. We urge Glasgow to consider the experiences of peer cities:

- **Edinburgh and Other Scottish Cities:** Glasgow stands out in Scotland for its restrictive policy. **Every other major Scottish city – including Edinburgh, Aberdeen, and Dundee – has examined this issue and chosen *not* to cap PHC numbers, and these cities maintain thriving taxi and private hire sectors.** Edinburgh City Council, for example, recently studied PHC supply and concluded there was *insufficient evidence* to justify any cap. In fact, consultants found significant unmet demand in Edinburgh's PHC market and advised that supply should be driven by demand, not an arbitrary limit. The Edinburgh licensing committee ultimately **rejected a cap on PHCs** (despite some calls for one), recognising that **the market had contracted and a cap would not serve the public interest**. Instead, Edinburgh continues to license new PHCs as needed – ensuring residents and visitors have ample transport options. There is no evidence of any ill effects from Edinburgh's decision; on the contrary, riders benefit from more choice, and drivers can enter the trade without costly barriers. Glasgow should follow the lead of its Scottish peers by allowing competition to flourish rather than artificially constraining it.

- **Manchester and Other UK Cities:** In English cities like Manchester, Birmingham, and Leeds, where regulators are unable to impose caps, have focused instead on stringent safety and quality standards for operators. The result has seen sustainable growth in ride-hailing and minicab services alongside traditional taxis, greatly improving customer service levels. For instance, **Manchester (with no cap) sees substantially lower average wait times than Glasgow** – as noted above, a Glasgow rider may wait 300% longer for a car at peak hours compared to a Manchester rider. This reflects the greater

[4] Glasgow taxi and private hire limit to be reviewed amid late-night transport concerns | STV News

supply available to meet demand in Manchester. The city benefits from a well-served public that can rely on PHC transport at all hours. London is another instructive example: Transport for London has never imposed an absolute cap on PHV licences (though considered at times), and at one point London's PHV fleet grew to over 80,000 vehicles serving the capital. That expansion in supply coincided with enormous uptake of services like Uber, **dramatically improving coverage in outer boroughs and for late-night travel**. The UK Competition and Markets Authority (CMA) observed in 2015 that many proposed restrictions on PHVs in London would **"artificially restrict competition, curbing developments that stand to benefit the paying passenger"**[5]. Instead, the focus has been on compliance, insurance, and driver standards – allowing consumers to enjoy the benefits of ample vehicle availability. Glasgow, as the largest city in Scotland, can likewise reap the benefits of a competitive, expanded PHC sector by removing entry barriers.

- **New York City:** The case of New York illustrates the pitfalls of strict caps and the benefits once they are loosened. For decades, New York's taxi industry was governed by a hard cap on yellow cab medallions (around 13,500 medallions) – a classic example of a closed market. The result was predictable: medallion values skyrocketed reaching a peak of $1m each, **transferring wealth to incumbent owners at the expense of drivers and riders**. By 2014, a medallion cost over $1 million, pricing out ordinary drivers and constraining supply even as demand grew. Riders, especially outside Manhattan, struggled to find taxis, and drivers who did not own a medallion had to lease shifts at high prices, often starting their day **"in debt" for the lease fee and having to work long hours just to break even.** The rigid cap thus led to poor service coverage and driver hardship. The emergence of Uber and other ride-hail services in New York (which initially were not subject to a cap) transformed this situation. Between 2012 and 2015, tens of thousands of drivers joined ride-hailing platforms, greatly expanding transportation availability in boroughs like Brooklyn, Queens, and the Bronx that were previously underserved. **Riders benefited through shorter waits and the ability to get a car in areas or times where taxis were rarely available**, and many drivers found they could work with more autonomy and no need to rent an expensive medallion. When New York City considered re-imposing a freeze on new PHV licenses in 2015 due to congestion concerns, it first commissioned a study to examine the impact. **That January 2016 study found that Uber and other FHVs were *not* a major contributor to Manhattan congestion** – the drop in traffic speeds was largely due to increased freight deliveries, construction, and general economic/population growth. E-dispatch (ride-hail) vehicles were **not** driving the increase in congestion in the Central Business District. This evidence led NYC to hold off on a cap at that time. (NYC eventually did impose a cap on ride-hail vehicles in 2018, but this remains a subject of ongoing debate and legal challenges, with critics noting the policy has reduced service availability without solving gridlock). The key takeaway from New York is that **open entry vastly improved service quality and equity** (especially in transit-poor areas), and many of the supposed benefits

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[5] Uber backed by competition watchdog in TfL regulation battle | Competition and Markets Authority | The Guardian

of caps – like congestion relief – did not materialize when studied. New York's long history shows that strict caps tend to benefit a few incumbents while harming consumers and drivers, whereas embracing innovation and growth can expand transport supply for the public.

- **Stockholm:** Stockholm is frequently cited as a model for taxi market liberalization. Sweden removed taxi quantity controls in the 1990s, leading to a much higher availability of vehicles per capita than in cities with caps. Stockholm today has about **7 taxis/FHVs per 1,000 inhabitants, compared to roughly 3 per 1,000 in heavily regulated cities like Paris, Rome, or Berlin.** Both riders and drivers in Stockholm experienced **immediate gains** from liberalization. Riders enjoy short wait times, broad coverage, and competitive pricing due to ample supply, while drivers have far more opportunity to enter the market and work flexibly. Notably, Stockholm's approach did not result in runaway congestion – instead, it fostered a healthy, competitive taxi and PHC industry responsive to passenger demand. The OECD's analysis[6] Sweden's reform found it increased service efficiency and customer satisfaction. The lesson from Stockholm (and other open-entry markets) is that **cities can successfully manage quality and safety through regulations *without* capping numbers**, thereby securing the benefits of competition. Glasgow's current ratio of PHCs per population is far below Stockholm's; lifting the cap would allow the market to move closer to an optimal supply, improving service for Glaswegians.

In summary, **cities that have lifted or avoided caps report better outcomes for consumers and drivers**. From Edinburgh to New York, the evidence is consistent: **more reliable and convenient access to ridesharing (subject to proper safety standards) means lower passenger wait times, better geographic coverage, and more flexible earning possibilities for drivers.** By contrast, imposing caps tends to freeze the market in an inefficient state – driving up wait times and fares, and often creating windfall gains for a limited pool of operators at the expense of the public. No city has "capped its way" to a more efficient or equitable transport network. Glasgow has an opportunity now to join the ranks of forward-looking cities that trust supply and demand to find the right balance, intervening with targeted measures on safety, emissions, or congestion *without* arbitrarily constraining the number of vehicles. The experiences of other cities show that **removing the PHC cap is not a leap into the unknown, but a step already taken successfully elsewhere**.

Competition and Regulatory Perspectives on Caps

Regulators and economists across the world have studied taxi/PHV caps extensively, and the consensus is clear: **artificial supply caps are anti-competitive and harmful to consumer welfare**. Numerous competition authorities and expert bodies have warned of the negative effects of such caps and recommended against them:

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[6] https://one.oecd.org/document/DAF/COMP/WP2(2018)1/en/pdf

- **International Association of Transportation Regulators (IATR):**[7] In March 2025, the IATR released a comprehensive report titled *"Vehicle Licensing Caps: Modernizing the Regulatory Framework."* It critically examines the impact of caps on taxis and PHCs worldwide. The IATR found that caps often lead to **"greater waiting times and lower customer satisfaction" for riders, along with increased costs for drivers**. Notably, the report debunks the rationale that caps are needed for environmental reasons – pointing out that with strict caps in place, incumbent operators feel little pressure to adopt cleaner vehicles (since no new competitors can enter with greener fleets). The IATR's **top recommendation** is to **"avoid licensing caps"** altogether, as caps can **exacerbate congestion and pollution** while increasing driver costs. Instead, the IATR suggests regulators focus on meeting local demand and adopt other strategies to achieve environmental or traffic goals. The IATR further recommends eliminating existing caps or at least **gradually increasing cap limits** to promote competition and innovation in the industry. Uber fully echoes the IATR's expert conclusion: **caps are a blunt tool that create more problems than they solve**, and modern regulatory goals are better met through flexible, data-driven approaches rather than fixed vehicle quotas.

- **OECD and Economic Analysis:** The Organisation for Economic Co-operation and Development (OECD) has studied taxi regulations as part of its competition reviews. In its seminal 2007 cross-country report, the OECD concluded that **"restrictions on entry to the taxi industry…lead to large transfers from consumers to producers, economic distortions and deadweight losses"**. In other words, caps cause passengers to pay higher prices or suffer poorer service (a wealth transfer to operators), and they introduce inefficiencies into the market. Crucially, the OECD found **"no evidence that drivers fare better in restricted markets."** This directly undercuts one argument sometimes made for caps – that limiting vehicles boosts driver incomes. In fact, drivers in open markets can do as well or better, especially when not burdened by expensive license costs. The UK's own Office of Fair Trading (OFT, a predecessor to the CMA) came to a similar conclusion in its 2003 market study: it recommended lifting quantity restrictions because caps **"reduced availability and lowered the quality of service to the public."**[8] The OFT's analysis suggested overall taxi service quality would be enhanced by removing entry limits, which would increase availability and spur operators to compete on quality. The economic evidence is overwhelming that **freeing up supply leads to better outcomes**, whereas constraining it tends to benefit a small group (license holders) at the expense of consumers and new entrants.

- **Competition and Markets Authority (CMA) – United Kingdom:** The CMA (and formerly the OFT) has consistently advocated for pro-competitive approaches in taxi/PHV regulation. In various consultations, the CMA has cautioned local authorities

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7 https://iatr.global/wp-content/uploads/2025/03/IATR-Vehicle-Licensing-Caps-Modernizing-the-Regulatory-Framework-March-2025-12421981-3.pdf

8 https://researchbriefings.files.parliament.uk/documents/SN02005/SN02005.pdf#:~:text=match%20at%20L1610%20concluded%20that,92

against measures that unnecessarily restrict competition. For instance, in a 2017 submission, the CMA stated **"the market works better without quantity restrictions on taxis and PHVs… [quantity restrictions] can actually have an adverse impact on both choice and price for consumers"**. The CMA further noted that any claimed consumer benefits of caps are unproven, whereas the **"long term benefit to society of lifting"** such caps is likely positive. Likewise, the CMA's responses to consultations in London and Sheffield argued that new rules should **"not favour certain groups or business models over others"**, warning that regulation should not entrench incumbents or stifle new services[9]. In London's case, as noted, the CMA opposed proposals it saw as aimed at limiting PHV operations, calling them **"excessive and unnecessary"** and **"to the overall detriment of users"[10]**. In Scotland, the CMA's principles are equally applicable: using competition law terminology, a cap on PHC licences is effectively a **quantity-fixing mechanism** that limits supply in the market. This runs counter to the general presumption in favor of open markets. We also note that the Scottish Government's own evidence gathering (e.g. the 2016 consultation by the Local Government and Regeneration Committee) included warnings that **license limits can drive up illegal taxis and should be a last resort**, and that **"markets work better without supply caps"** on taxis/PHCs. In line with these authoritative views, Uber submits that Glasgow's cap represents an **anti-competitive policy** that is not justified by consumer benefit. Removing it would stimulate competition on price and service quality, aligning with the CMA's guidance that regulation should be **"proportionate"** and not **"act as a barrier to competition and new entry"**. Healthy competition will drive operators (Uber included) to improve – whether through lower wait times, innovative services, or better driver incentives – all to the **benefit of passengers**.[11]

- **The Canadian Government** found that "placing an absolute limit on the number of taxis that can operate in an area is the most restrictive approach regulators can take, with associated negative impacts on competition and its benefits."[12]

- In January 2016, **Spain's Comisión Nacional de Mercados y Competencia** ("CNMC") challenged regional taxi regulations in Málaga and Córdoba, arguing they reinforced taxi

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9 https://localgovernmentlawyer.co.uk/licensing/399-licensing-news/31880-cma-warns-council-on-anti-competitive-taxi-policy#:~:text=She%20said%20the%20CMA%20recognised,innovation%20that%20competition%20can%20bring%E2%80%9D

10 https://www.theguardian.com/business/2015/dec/02/uber-competition-watchdog-tfl-regulation-battle#:~:text=In%20a%20response%20lodged%20to,private%20hire%20services%20in%20London%E2%80%9D

11 https://www.gov.uk/government/publications/private-hire-and-hackney-carriage-licensing-open-letter-to-local-authorities/regulation-of-taxis-and-private-hire-vehicles-understanding-the-impact-on-competition

12 https://competition-bureau.canada.ca/en/how-we-foster-competition/promotion-and-advocacy/regulatory-adviceinterventions-competition-bureau/modernizing-regulation-canadian-taxi-industry#sec05

drivers' monopolies and harmed consumer welfare. According to the CNMC, laws restricting the number of taxi drivers limit market entry for new players and reduce competition, and this resulted in higher consumer costs, with estimated annual overcharges of EUR 4.4 million in Málaga and EUR 2.5 million in Córdoba.

- In March 2015, the **Australian Government's Harper Report** reviewed competition policy regarding taxis. It highlighted that license restrictions contribute to higher taxi fares, which disproportionately affect elderly and low-income consumers and hinder innovation.[13]

- The **Hong Kong Competition Commission** recommended in 2019 that, to facilitate more competition on price and quality, the market could be left to decide the number of taxis each franchisee holds.[14]

In summary, **expert opinion strongly counsels against caps**. The IATR urges regulators to refrain from caps and eliminate existing ones. The OECD and CMA have found that caps harm consumers (through reduced availability or higher fares) and offer no clear gains to drivers. Competition authorities worldwide view caps as a distortion of the market that typically **reduces incentives for service improvement and innovation**. We concur with these findings. Glasgow City Council should not maintain a policy that effectively "picks winners" by protecting certain operators to the detriment of the travelling public. Instead, by removing the cap, the Council will be aligning with best practices endorsed by competition and regulatory experts, ensuring that **passengers, drivers, and the city economy reap the rewards of a vibrant, competitive PHC sector**.

Addressing Congestion and Air Quality Concerns

One of the common arguments made in favour of caps is that limiting the number of PHCs on the road will reduce traffic congestion or improve air quality. We understand these concerns – Glasgow, like all major cities, seeks to manage congestion and meet air quality targets. **However, evidence shows that caps are an ineffective and even counterproductive tool for these goals.** Glasgow can better address congestion and emissions through **innovation and incentives (such as ride-pooling and electric vehicles) rather than blunt supply restrictions.**

Firstly, as noted in the New York case, independent studies found **ride-hail vehicles were not the primary cause of congestion** in city centres. Urban congestion is a complex issue driven by many factors (commercial delivery trucks, private cars, roadworks, etc.). A few thousand additional PHCs, which spend much of their time replacing trips that might otherwise be taken by personal cars, have a marginal impact on overall traffic flow. In downtown Glasgow, private

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[13] https://treasury.gov.au/sites/default/files/2019-03/Competition-policy-review-report_online.pdf

[14] https://web.archive.org/web/20240525001504/https://www.chinadailyhk.com/hk/article/382294

cars and delivery trucks constitute the bulk of traffic; PHCs are a relatively small share. It is far more effective to target private car usage (through measures like congestion charges, improved transit, or parking policies) than to restrict PHCs. Indeed, **if riders cannot get a PHC due to lack of supply, they may resort to driving their own cars, which *increases* congestion and emissions** – exactly the opposite of the policy intent[15]. A robust PHC network can actually complement public transport and reduce car ownership; many studies have found that people use services like Uber as a feeder to transit and in some cases choose not to buy a personal car because on-demand rides are available. Artificially choking off that option via a cap could push more cars on the road.

Secondly, **new mobility models like ride-pooling (shared rides) offer a real solution to congestion**, but caps would stifle them. For example, an MIT study of New York City found that optimal ride-pooling could cut the number of vehicles on the road by 30% or more without significantly impacting travel time for passengers. Uber has developed and deployed car-pooling options (such as UberX Share and Route Share) in many cities to enable riders headed the same direction to share a car. These services have demonstrably reduced vehicle miles travelled and emissions where implemented. However, a supply cap prevents the market from having the "critical mass" of drivers needed to make pooling viable. The **Australian Productivity Commission** put it well: *"limiting the number of taxi licences and preventing other services from competing with taxis has raised costs for consumers… and hindered the emergence of innovative passenger transport services."*

Thirdly, on air quality: The key to cleaner air is **vehicle electrification** and increased use of lower impact modes including walking, biking, share trips and public transport, not suppressing the number of vehicles. Whether Glasgow has 3,000 or 4,000 PHCs, if they are gasoline/diesel, they will pollute; if they are electric, they will not. Caps do nothing to incentivize a transition to electric vehicles (EVs) – in fact, they can **discourage it**. The IATR report noted that under a strict cap regime, operators have less incentive to upgrade to low-emission vehicles because they face no threat of a new entrant undercutting them with a greener fleet. By contrast, in a competitive market, there is pressure for operators to modernize and differentiate – for example, offering electric or hybrid options to appeal to eco-conscious riders. Uber has seen this dynamic in action: in London (no PHC cap), we launched a Clean Air Plan[16] in 2019 which has since helped **tens of thousands of drivers switch to electric vehicles**, resulting in London now having over 7,000 EVs on the Uber platform (the largest EV fleet of any Uber city). If a cap had been in place stifling market entry, it's unlikely we would have seen such rapid EV adoption. Furthermore, **Glasgow's current cap could slow the replacement of older, more polluting cars**. With only a fixed number of licences, an individual who holds a PHC licence has less competitive pressure to retire an aging diesel vehicle in favour of an EV – they know that new competitors are capped out. Conversely, without a cap, there is greater turnover and incentive to invest in newer, cleaner vehicles to remain attractive to riders (and to meet any evolving licensing standards the Council may set, such as emissions requirements).

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[15] https://uber.app.box.com/s/3jk1u387p9q38jp4phmvaxdkq9buemp7

[16] https://www.uber.com/gb/en/u/ride-journey-to-electric/

It's also worth noting that **Glasgow can pursue environmental and congestion objectives directly** through targeted policies, rather than indirectly through a cap. For instance, if congestion in the city centre is a concern, the Council could explore congestion pricing or dedicated pickup/drop-off zones for PHCs to minimize circling. To improve air quality, the Council could implement stricter emission standards for PHCs (e.g. requiring new licensed PHCs to be low-emission or EV by a certain date) – an approach already taken with the taxi fleet moving toward zero-emission capable vehicles. These measures would tackle the issues head-on **without denying consumers transport options**. The blunt instrument of a cap does not distinguish between a high-polluting vehicle and a zero-emission one, nor between a vehicle contributing to congestion and one alleviating it via shared rides. In fact, **the IATR cautions that caps can "exacerbate traffic congestion [and] pollution" rather than reduce them**. We agree: a cap is a very limited tool that risks unintended side effects, whereas more nuanced policies can achieve the desired outcomes (for example, incentivizing trips at off-peak times or promoting pooling to reduce downtown traffic).

In conclusion, **concerns about congestion and air quality, while legitimate, are not solved by capping PHC numbers**. Empirical evidence all indicates that smart, flexible, comprehensive strategies outperform static caps in addressing these challenges. Uber is committed to being part of the solution on both fronts – through innovations like Uber Green (electric vehicle options) and UberX Share (pooled rides) – working in partnership with cities. We encourage Glasgow to tackle congestion and pollution **directly via modern transport policies**, rather than maintaining a cap that sacrifices rider and driver welfare for little gain.

Uber's commitment to EVs and working with Glasgow

Uber understands that simply removing the cap is not the end of the discussion – it is also about **what comes next** in building a sustainable, efficient transport network. We are fully committed to working with Glasgow City Council to ensure that a post-cap environment accelerates progress toward the city's goals, especially the transition to electric vehicles (EVs) and reduction of transport emissions. Uber has made ambitious commitments globally to sustainability, and we want to bring those benefits to Glasgow. Concretely, **if the cap is lifted, Uber will work with the Council to invest in and incentivise a greener PHC fleet for Glasgow.** Key initiatives we propose include:

- **Accelerating EV Adoption:** Uber will leverage its resources and experience from other cities to help **rapidly increase the share of electric PHCs in Glasgow**. We have learned that financial incentives and support for drivers are crucial. Uber is prepared to introduce **EV incentive schemes for drivers**, and we can look to expand access to our existing **Clean Air Fund** (which in London has provided grants to drivers switching to EVs). By removing the cap, new entrants who have invested in EVs can join the market, and existing drivers will also have more confidence to switch knowing the market is growing. This organic growth, combined with Uber's incentives, can outpace what a capped fleet could achieve in EV penetration. **In a capped scenario, we estimate EV adoption would plateau lower, as the fleet cannot expand or renew as**

dynamically.[17]

- **Charging Infrastructure Partnerships:** We recognise that one barrier to EV adoption is charging availability. Uber has **partnered with charging providers to expand charging infrastructure** accessible to drivers. For example, we would seek to collaborate on installing fast chargers at key locations (such as near Glasgow Airport, central rail stations, and popular nightlife areas) where PHC drivers can conveniently charge between trips. Uber has experience working with companies like BP Pulse, Shell Recharge, and others to set up dedicated charging hubs for drivers in cities like London. We can bring similar partnerships to Glasgow, potentially identifying Council-owned car parks or vacant lots that could host new fast charging stations. Additionally, we will explore volume discounts or subsidy programs for our drivers to use existing chargers. By improving charging access, we aim to eliminate "range anxiety" and downtime concerns for PHC drivers, thereby removing a major hurdle to full electrification.

- **Ongoing Collaboration and Data Sharing:** Uber is committed to being a transparent and cooperative stakeholder in Glasgow's transport ecosystem. We can add Glasgow to our online EV charging demand heatmapping tool allowing city officials and utility decision makers involved in EV charging deployment on where to locate new charging sites. Our aim is to ensure the Council has confidence that lifting the cap is yielding positive results, and if any unintended effects arise, they can be managed in partnership with operators. Uber brings analytical capabilities and a willingness to adapt our operations in response to city priorities.

- **Investing in Safety and Standards:** Alongside EV and congestion goals, Uber will maintain a focus on safety and quality in an open-entry environment. We will continue to support rigorous background checks and licensing standards for PHC drivers in Glasgow, working closely with the licensing authority. Uber has introduced new safety features in our app (such as an in-app emergency assistance button, rider and driver identity verification, and trip recording options) and will ensure Glasgow benefits from the latest safety innovations.

- We can look to share insights on how dynamic pricing and driver incentives help regulate supply to match demand in real-time, preventing an oversupply from causing congestion. Essentially, **Uber's technology acts as a self-regulating mechanism** far more nimble than a fixed cap, dispatching drivers when and where they are needed and discouraging clustering where they are not.

The no-cap scenario enables a higher and faster adoption of EVs. Without a numerical limit, any driver (incumbent or new) who acquires an EV can get a licence and start servicing demand – thus the pool of EVs grows more rapidly. In contrast, under the cap, the number of vehicles is fixed; even if an incumbent driver switches to an EV, it doesn't increase the total EV share as

[17] https://www.uber.com/en-EG/newsroom/gogetzero-2024/

quickly, and new EV drivers are turned away once the cap is hit. Furthermore, a no-cap market encourages competition on having the "greenest" fleet, whereas a capped market has fewer competitive pressures to invest in EVs.

Uber is excited about the prospect of a **growing, greener PHC sector in Glasgow**, and we are prepared to contribute resources to make it a reality. We want to ensure that the benefits of lifting the cap – improved service and competition – also align with Glasgow's environmental and social objectives. Uber's vision is that **Glasgow can have both**: **a higher quantity of PHCs *and* higher quality (cleaner, safer) service**. By working together on initiatives like those above, we can turn that vision into a reality. We reiterate: a cap is not needed to achieve policy goals; cooperation and innovation are the better path.

Conclusion: A Call to Remove Glasgow's PHC Cap

In conclusion, Uber strongly recommends that Glasgow City Council **remove the cap on Private Hire Car licences**. The evidence is compelling that the cap's continuation would do more harm than good:

- It would perpetuate **long wait times, trip shortages, and poor service** for riders, especially at night and during events.
- It would continue to **hurt the night-time economy and public safety**, by discouraging people from coming into the city and potentially pushing those who do not feel they can rely on outbound transport options.
- It would **exclude new drivers** who are ready to work, denying them economic opportunities and constraining competition that benefits consumers.
- It would **disproportionately impact vulnerable communities and late-night workers** who rely on PHCs when other transport is unavailable.
- It is **anti-competitive**, flying in the face of advice from the IATR, OECD, CMA and others who warn that caps reduce consumer welfare and protect incumbents at the expense of innovation[18].
- It is **not an effective tool for congestion or air quality** – those aims can be better achieved through promoting EVs, shared rides and comprehensive congestion policies which Uber is committed to advancing.

18 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/360631/SP_call_for_evidence_response_on_Air_Weapons___Licensing_Bill.pdf

Removing the cap, on the other hand, will bring **tangible benefits**: shorter wait times, better coverage across Glasgow, and more flexibility for riders and drivers alike. It will allow market forces and technology to meet the demand that clearly exists, rather than suppressing that demand to the detriment of the city's reputation as a vibrant place to live, work and visit.

Uber envisions a Glasgow where **everyone who needs a ride can get one within minutes**, where **drivers can join the industry and earn a decent living without undue barriers**, and where the **PHC fleet rapidly modernises to electric zero-emission vehicles** – all of which is achievable in a no-cap environment.

Ultimately, the purpose of Glasgow's taxi and PHC licensing policy should be to serve the **public interest** – ensuring safe, efficient, and accessible transportation for the community. The current cap does not meet that purpose in light of changed circumstances and growing demand. As Cllr. Alex Wilson noted, it is right to ask whether existing policies are **"still proportionate and necessary" in a shifting landscape**.

We respectfully submit that the PHC cap is neither proportionate nor necessary in 2025. Uber appreciates the Council's careful consideration of this issue. We are confident that by removing the PHC cap, Glasgow will see a **positive impact on mobility, economic activity, and resident satisfaction**. Uber stands ready to support the city in implementing this change and ensuring it is a resounding success for all stakeholders.

Thank you for your attention to our submission. We remain at your disposal to provide further data or clarification as needed.

Yours sincerely,

[redacted]

Matthew Freckelton
Head of Cities, UK
Uber

From:	[redacted]
To:	Licensing Enquiries
Cc:	[redacted]
Subject:	Overprovision of Private Hire Cars and Unmet Demand of Taxi Services
Date:	28 May 2025 12:02:27
Attachments:	[redacted]

Good Afternoon,

Please find attached Unite's formal response to the consultation *"Overprovision of Private Hire Cars and Unmet Demand of Taxi Services."*

We appreciate the opportunity to contribute to this important discussion, and trust that our submission will assist the committee in its assessment and decision-making. Should any further clarification or engagement be required, we would be pleased to provide additional input.

Yours sincerely,

Andrew Brown
Unite Regional Officer
145-165 West Regent Street
Glasgow
G2 4RZ

[redacted]

John Smith House
145-165 West Regent Street
Glasgow
G2 4RZ

[redacted]

REGION: SCOTLAND

Our Ref: AB/JC

Send by email - 28th May 2025 to LicensingEnquiries@glasgow.gov.uk [redacted]

Licensing Section
Glasgow City Council
Glasgow City Chambers,
Glasgow
G2 1DU

GCC Consultation - Over provision of Private Hire Cars and Unmet Demand of Taxi Services

We are contacting you regarding the above. The Cab Section Branch of Unite has consulted with their members, other trade groups, and has also undertaken various surveys to monitor supply and demand.

We are of the view that the number of Private Hire should be maintained at 3,450 and there is not sufficient evidence to support removing the current cap.

We are concerned that removing the cap and flooding the market with unlimited numbers would not be in the public interest. The very reason for a regulated cap is to prevent a race to the bottom where vehicle and passenger safety is at risk.
This cap ensures that every vehicle and driver on the road meets proper standards. Without it, the market could be overwhelmed, leading to more traffic, pollution, and unregulated operators.

Glasgow's Hackney Fleet proudly remains 100% accessible, meaning our disabled customers from Glasgow and beyond will always have transport they can rely on. If the number of private hire vehicles increases without limit (and most are not accessible) it will make it harder for disabled passengers to get the transport they need.

Some will argue that more vehicles are needed, but we already have an under capacity in the city. As of April 2025, over 200 Taxi cab plates were available from Glasgow City Council.

We believe that the reality is a shortage of opportunity, with the need for the Council to remove barriers to enter the trade.

Failure to recognise this, and act accordingly, will not increase vehicle numbers but do the opposite resulting in lost vehicles, lost accessibility and ultimately loss of a green ULEZ compliant service in favour of a race to the bottom, lining the pockets and profitability of conglomerates and systematically dismantling an already under pressure service.

We're also very concerned about the influence of companies like Uber. Uber has a long record of avoiding local rules, lobbying councils, and putting profits first. Uber doesn't own cars or employ drivers - they just run an app. Their goal is to make money for shareholders, not to provide public transport or keep people safe.

This isn't just about business. It's about protecting a fair, safe, and accessible transport system for everyone in Glasgow.

Yours sincerely,

[redacted]

Andrew Brown
REGIONAL OFFICER
On behalf of Unite the Union – Glasgow Cab Section

[redacted]

From: [redacted]
To: Licensing Enquiries
Subject: Taxi Consultation..
Date: 20 March 2025 18:16:44

Dear Sir/Madam,
I think there is enough taxis both private and Hackney, as a former Hackney driver of 37years I can tell you that the problem isn't the number of taxis in the town the problem is out of town taxis from neighbouring districts coming into the city and picking up and dropping within the city which is outwith their licences area. Poor enforcement and parked cars on taxi ranks makes it nigh on impossible to get near a taxi rank at times within the city centre. A crack down on Private hire companies who have cars not licensed in Glasgow but dispatch cars a to pick up in Glasgow and drop in Glasgow should be looked at. If this was stopped it may encourage more legitimate glasgow licensed cabs work at night.

William Sawers….
Sent from my iPad