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MAYOR'S TRANSPORT STRATEGY

The Consultation for the draft Mayor's Transport Strategy (MTS) closed on 12 January 2010. The draft MTS sets out the Mayor's vision for transport in the Capital over the next 20 years. It prepares for London's predicted growth of 1.3 million more people and 0.75 million more jobs by 2031 and supports sustainable growth across central, inner and outer London. A report will give recommendations to the Mayor on the strategy following the results. The final MTS will be published in spring 2010.

The following letter has been sent to Boris Johnson from Steve Wright, MBE, Chairman of the Licensed Private Hire Car Association, setting out the thoughts of his members. Steve is also a member of the TfL Board, representing Private alongside Bob Oddy representing the taxi trade.

11 January 2010

Dear Boris,

I write on behalf of the Licensed Private Hire Car Association (The LPHCA), which represents over 150 of the primary licensed Private Hire Vehicle (PHV) Operators in London, who engage with around 15,000 of London's PHV Drivers who provide services to nearly ½ Million Passengers a day in the Capital.

Firstly, I wish to welcome the opportunity once again to respond to a Mayoral Transport Strategy (MTS). As Chairman of the LPHCA, I did respond to your predecessor's Strategy Document with great effect and the LPHCA is grateful for the opportunity to comment on yours.

Much has changed since then, for example Private Hire in London was virtually an unregulated entity, misunderstood to the extent that it was proposed that the industry would not in fact be entitled to Congestion Charging Exemption in the previous Mayor's Strategy Document. The LPHCA successfully campaigned for a change of policy with your predecessor, his key advisors and the Greater London Authority's (GLA's) Transport Scrutiny Committee; who recognised that an 'about to become licensed industry' needed to enjoy the same concessions as the other Taxi mode - Hackney Carriages (Black Cabs).

You will be aware that the fully licensed Private Hire industry is now double the size of the Hackney Trade and that it provides a range of services for the Capital, via the only guaranteed 24 hour 'Pre Bookable' door to door service in London. The licensed Private Hire trade has moved on tremendously since the last Strategy Document, bringing a high quality of service via a diverse range of vehicles; in particular the industry provides a great range of Accessible Vehicles.

To enable you to realise your objectives, the aspirations of the London Plan and the vision set out in chapter 2 as soon as possible, the licensed Private Hire part of the Taxi industry must play a vital role.

With regard to Section 5.5.2 Private Hire - Proposal 27 - We would like to make the following comments (in italics).

The Mayor, through TfL, and working with the London Boroughs and other stakeholders will support improvements to private hire services (especially minicabs) through the following:

We are delighted that the Mayor, through TfL, will be working closely with London Boroughs and other stakeholders to support improvements to Private Hire services (especially minicabs). We would respectfully point out however that not only minicabs but many other Private Hire Vehicle Services are provided in the delivery of London's 'Door to Door' needs.

a) Initiatives that deliver further the success of the Safer Travel at Night scheme

The LPHCA will continue to support the Safer Travel at Night scheme by working with the Mayor's Office, the Metropolitan Police, the GLA, TfL, London Boroughs and all other agencies to deliver further success.

b) Provision of facilities to pick up as well as drop off passengers where appropriate

The LPHCA welcomes this proposal but would also like to stress the importance of being able to park legally once passengers are set down, without harassment or fear of ticketing. If licensed Private Hire is able to legally park close to set down and pick up points, it will enable greater and quicker service provision, whilst providing a reduction in emissions, so both the travelling public and the environment will benefit.

There is currently some thinking to restrict where Private Hire Vehicles can park, etc., to allegedly prevent touting. It is very important that whilst all methods of eliminating touting are considered, legitimate Private Hire must not be prevented from servicing the needs of Londoners by 'over zealous' restrictions that makes the picking up of passengers in a safe and accessible manner more difficult.

c) Action against plying for hire, touting, unroadworthy vehicles and illegal cabs

The LPHCA will continue to work with the Mayor's Office, the Metropolitan Police, TfL, the GLA, London Boroughs, Government and all other agencies, to deliver further successes in the campaign against touting.

The doubling of the number of police officers by the Mayor and the work of the 'Safer Transport Command' has already impacted positively in the war against touts but much more needs to be done.

With an Olympic Games in just 2 years time, all illegal activity must be eradicated and this must not be restricted solely to 'street touts'. There are clearly many forms of illegal activity in particular companies and individuals making the illegal invitation for the provision of drivers, vehicles and services on the internet.

The LPHCA wants, and in fact is demanding, ongoing action against all forms of illegal activity followed by prosecution in the courts. We also want the relationship between Drivers, Operators and Vehicles to be 'joined up' to prevent 'Licensed Drivers' who work illegally and independently of

'Licensed Operators' being given a licence in the first place. Similarly we need to ensure that once in possession of a licence they actually work with a 'Licensed Operator'.

The 'joining up' of Drivers, Operators and Vehicles will also help to prevent and prosecute those who commit 'Congestion Charge' fraud and eliminate illegal touts.

d) Continuous process improvements to provide a modern and cost effective Licensing service

The LPHCA warmly welcomes this proposal. With the benefit of having had a Licensing System in place for several years, the industry now needs a modern and cost effective licensing service based on lessons learned from that system, which must incorporate the utilisation of modern technology, in particular the internet.

We would like to see TfL encourage (if necessary by licence fee reduction incentives) the use of internet based Licensing Management Systems like CabOperator™ in conjunction with new 'environmentally friendly' TfL online Licensing Systems. Where CabOperator™ has been introduced, compliance has improved and thousands of paper documents have been eradicated in the 'licensed operating centres' that have adopted it.

Such systems will also lead to other environmentally friendly benefits including - the ability to inspect remotely without travelling to licensed Private Hire operating centres. This saves cost and releases valuable time to do more enforcement.

The joining up of the relationship between Drivers, Operators and Vehicles will become possible via such systems, which are essential in the campaign against illegal activity.

e) Lower emissions from PHVs

Licensed Private Hire is of course already the least polluting mode of Taxi in London with vehicles on average being younger and more Euro Compliant on emissions than London's Hackney Carriages (Black Cabs).

The Private Hire Industry is not complacent and wants to commit to becoming even more compliant with a desire to exceed the draft requirements as set out in your 'Mayor's Air Quality Strategy' consultation.

The LPHCA has already engaged in this process with TfL and has also had a meeting with your Mayoral Advisor Isabel Dedring regarding what the industry can potentially do. Alongside LPHCA representatives I have also attended the 'Air Quality Strategy' workshops at the PCO.

There is however a very simple way to reduce emissions from PHV's, whilst at the same time improving PHV service provision and availability in London.

Before the proposals on Page 145 in Chapter 5, the Draft MTS states:- 'As the licensed industry matures, there may be opportunities to review the contribution such services play and reappraise the restrictions in force'.

The LPHCA would comment that the time is now right and the industry is now mature enough to remove a restriction that it was reasonably expected would be removed at the completion of licensing

'ACCESS TO BUS LANES'

At a stroke TfL and the Mayor could reduce emissions, improve services and meet several of the key objectives of the MTS by giving licensed PHV's 'bus lane access'.

London Councils, consumers and Londoners have responded very positively to the initial proposals of this happening and hopefully the Mayor and TfL will do so too. Giving PHV's access to bus lanes will also bring London in line with other parts of the UK and Europe. As TfL and London Councils are major users of Private Hire Vehicles, in particular specialist 'Accessible Vehicles' for Dial a Ride and TaxiCard, it is timely that the GLA are looking at their provision and the Mayor's Transport Strategy consultation is happening.

Not only can Private Hire reduce emissions, it can reduce costs and no doubt bring them down further with access to bus lanes. The LPHCA and others will be lobbying hard for access to bus lanes and I am sure that you will be hearing from the industry in the near future in this regard.

On behalf of our members I would like to thank you for giving the LPHCA the opportunity to comment on all of your excellent proposals in the MTS and I have responded with specific regard to our industry on this occasion.

Yours sincerely
Steve Wright MBE, Chairman LPHCA

