



The Licensed Taxi Drivers' Association

Taxi House
Woodfield Road
London
W9 2BA

To whom it may concern,

Merton: Draft Third Local Implementation Plan (LIP3) Consultation Response

We are writing to you to in response to the public consultation on the London Borough of Merton's Draft Third Local Implementation Plan (LIP3): Transport Plan.

The Licensed Taxi Drivers' Association is the professional and authoritative voice of London taxi drivers, representing over 10,500 members. We are committed to ensuring that our member's voices are heard and to maintaining the high professional standards that have become synonymous with London taxi drivers.

The importance of licensed taxis as a means of public transport

The LTDA is pleased to state that it agrees with many of Merton's proposals, and commends Merton for pledging to take a proactive approach to facilitating the use of taxis in the Borough and to supporting improved taxi facilities (Policy 5.51). This will help achieve the Mayor of London's Transport Strategy (MTS) Policy 20, which has a stated aim of having a world class taxi service that will 'flourish'.

As the only part of the transport network that is 100% wheelchair accessible, providing a door-to-door service for passengers, taxis prioritise the safety and comfort of their customers above all else. This is why they provide a not only popular, but crucial service to passengers who are disabled or with restricted mobility. In a report authored by EO Consulting, on behalf of London Councils, it was confirmed that the number of Taxi Card trips in the borough has continually grown for the past two years.

Taxi Ranks

Consequently, the sufficient provision of taxi ranks are paramount to reduce congestion. Expanding the number of taxi ranks will dramatically decrease the necessity for drivers to 'idle' and 'ply for hire' in moving taxis, reducing air pollution and congestion and making it far easier for passengers to locate and board taxis. Particularly with the arrival of more night-time tube services and a wider evening economy, locations should be obvious and fully accessible.

We note with approval MTS Policy 10, Proposal 50, which identifies that over ranking by taxis is a problem in the borough, particularly at Wimbledon Station. The LTDA believes that this issue has been caused by TfL releasing excessive licenses without accurate consideration of local needs and existing ranking provisions.



We hope that LO27's pledge, to "review and upgrade taxi standing facilities by 2021", is fulfilled. We would appreciate the ability to consult on deciding a sufficient number of taxi ranks and where they will be located, to ensure they are fully accessible.

Air Quality, Ultra-Low Emission Zones & Charging Infrastructure

We welcome efforts which to enhance air quality as, after all, taxi drivers are some of the worst impacted by poor air quality, as they are exposed to dangerous levels of air pollution every day whilst driving across our city. Consequently, London's taxi trade are leading the way in efforts to clean up London's air and transition to zero emission vehicles. Since January 2018, all new taxis licensed in London have been Zero Emission Capable, and the taxi trade has invested over £50 million in this new technology, with numbers of the new cabs only being limited by supply issues, and an inability to meet demand.

We are pleased that Merton intends to assist this transition, by "facilitating a network of rapid chargers to target high mileage users, taxis and freight users at busier industrial locations" (Policy 3.76). Ensuring widespread accessible, affordable and dependable rapid electric charging points are in place will reassure our members of the value of making the significant financial investment in a new vehicle. We would welcome the opportunity to engage with key stakeholders regarding the location of the outlets.

After the Ultra-Low Emission Zone (ULEZ) is implemented, there will also be a greater number of electric vehicles on the capital's roads, meaning a huge strain on charging points. This is an additional reason why there needs to be additional charging infrastructure.

Furthermore, it should be noted that if any 'mini' Ultra-Low Emission Zones are "introduced in the areas of the borough identified as having the poorest air quality" (Policy 3.81), should reflect the Mayor of London's Central London ULEZ. The Zone will exempt taxis in recognition of the action the trade is already taking to combat poor air. Thus, any Zones in Merton should mirror this approach. Before London's taxi fleet fully transition to ULEVs, it's critical that taxis are allowed maximum possible access to all roads. Any access restrictions proposed need to be carefully consulted over with the LTDA.

To conclude, the LTDA looks forward to the fulfilment of the Plan's policies and to being consulted on the following issues, to ensure the views of the taxi industry are accommodated:

- **Taxi Ranks**
- **Electric Vehicle Charging Points**
- **Access under any proposed 'mini' Ultra-Low Emission Zones**

Please do let me know if you would like to discuss our response in any further detail, or if you have any questions.

Yours sincerely,

A handwritten signature in black ink, which appears to read "Richard Massett".

Richard Massett - Chairman of the Licensed Taxi Drivers' Association