

Rt Hon Sadiq Khan
Mayor of London
City Hall
The Queen's Walk
London
SE1 2AA



12 June 2019

Dear Sadiq,

I understand that you are shortly to make a final decision on reducing the age limit of London black cabs and write to express the gravest concern on this matter of behalf of the LTDA's 11,000 members across London and the trade as a whole.

Since your initial announcement, we have had significant concerns around the consultation process. We have reason to believe that senior staff at Transport for London have pre-judged the results of the consultation on this proposal and were briefing that twelve years would be the revised time limit to the private hire trade in December 2019. I also understand that TfL / City Hall staff have actively encouraged individuals and organisations to respond to the consultation in support of your plans when it became clear that the majority of respondents opposed it. We have no confidence that the consultation was conducted in a fair and open manner and believe that it was a tick-box exercise designed to allow you to push forward with your proposals without real consideration of the impact on the trade, or even the effectiveness of alternative proposals to reduce emissions.

As you know, the LTDA has proposed an alternative solution, which would deliver emissions savings and better value for London taxpayers without disproportionately penalising the cab trade. The solution that we propose utilises identical retrofitting technology to that supported and funded by Transport for London when applied to buses. The suppliers of this technology have indicated to us that the emissions reductions deliverable in practice on London roads through using this technology will be significantly greater than the figures used by TfL in assessing this.

In 2015, we predicted that it would be possible to have 9,000 zero-emission-capable (ZEC) cabs on London roads by the end of 2020, and you adopted this as a target. This prediction was based on information at the time that the LEVC-built vehicle would be available eighteen months earlier than it actually came to market, that it would be around £10,000 cheaper than its eventual market price, and that there would be a choice of ZEC vehicles available from different manufacturers making it easier for more cabbies to switch.

Despite these significant hurdles, the cab trade has made strong progress in working towards your target, with nearly 1,800 ZEC vehicles currently operating. We expect to reach 2,000 vehicles by the end of August and 2,600 by the end of 2019. With increased vehicle availability, it is feasible to deliver between 5,500 and 6,000 ZEC taxis on our streets by the end of 2020.

Your proposal to reduce the taxi age limit will seriously jeopardise this progress. In the months following your consultation announcement, sales of ZEC cabs plummeted, as drivers' loss of confidence crashed the second-hand vehicle market, with a collapse in residual values of older vehicles wiping out tens of millions in equity. This is making it even harder for cabbies to afford new ZEC cabs. Sales have only recovered over the past two to three months, driven precisely by the cab trade's support for the LTDA's alternative proposals. If you choose to ignore our proposals and continue with your plans to penalise the cab trade, it will become harder and harder to encourage drivers who have no confidence in your vision for the future of the trade to invest in clean vehicles.

London's iconic cab trade is in a precarious position, but we remain the only 100% accessible form of public transport in the capital. It is not an exaggeration to suggest that your plans to reduce the taxi age limits could wipe out the trade over the next ten years, putting thousands of self-employed Londoners out of work and making it harder for businesses and individuals to move around the city.

My members drive on London roads every day, breathing in polluted air. I regularly engage with organisations and campaign groups on air quality. We understand more than anyone the need to reduce emissions and are committed to doing our part to improve London's air quality. Your out-of-the-blue decision to penalise the trade, without putting in place any support to help us switch, is not the way to go about this.

In the strongest terms, I urge you to reconsider and meet with me as soon as possible to discuss how together we can meet your objectives of reducing vehicle emissions and safeguard the future of the taxi trade.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Steve McNamara', with a stylized flourish above the name.

Steve McNamara

General Secretary, The Licensed Taxi Drivers' Association (LTDA)