

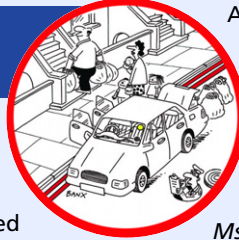
LONDON PLAN

ENOUGH!

The LPHCA has responded to the Mayor's proposed amendments to the London Plan, which is a strategy document and blueprint for the capital. The response has in summary the following points.

- 1). The constant use of the word 'Minicab' as opposed to 'Private Hire'.
- 2). Poor Local Authority Transport & Travel Plans *including pick up and set down problems*
- 3). Poor Local Authority Unitary Development Plan's including planning considerations for 'Licensed Private Hire'

Re: Revisions to the London Plan



As always we are delighted to respond to consultations that affect our Industry and Londoners.

As an Association that lobbied for, and recognised the value of a London Wide Authority The LPHCA is pleased to see the proposed amendments and revision to the London Plan. As with the Mayor's Transport Strategy document, the London Plan gives us all an opportunity to look forward and this consultation lets us have a say, so your team can study any reflect on any constructive comments.

Throughout the document the importance of Public Transport is emphasised and now with Private Hire Licensing nearing completion Private Hire now needs to be more seriously considered and included as it is **the only completely pre-bookable 'door to door' public transport mode.**

Our first comment is that in places the document refers to 'Minicabs' in some sections and elsewhere to 'Private Hire'. Whilst we are very proud of our now 'licensed' Minicab Companies and the vital services that they provide, the word Minicab is only applicable to around half of the newly licensed sector. Chauffeur, executive, hospital, school and community transportation in our estimation will make up around half of the Licensed Industry, so we wish to request that we are referred to as 'Private Hire', with vehicles, drivers or operators used as applicable.

Our next comment is on the area of 'travel plans' and 'planning' within Local Authority 'Unitary Development Plans' (UDPs). It is our view that we have, in the main, been disregarded prior to licensing in areas of town planning, travel planning, parking, picking up and setting down.

Some Primary Legislation and Local Traffic Regulations have **failed spectacularly** to 'future proof' their legislation with regard to these areas and you will be aware of the great difficulties our sector has recently had legitimately providing safe and legitimate 'door to door' travel.

The current reality is that cameras have brought to the fore the fact that little or no transport planning or future proofing of regulations took place prior to the Greater London Authority and Transport for London (TfL). The cameras have exposed the fact that the only way Private Hire can deliver the service demanded and required by the travelling public, is unacceptably to **'take a chance' when dropping passengers off.**

Whilst this is being addressed in part by your goodself and TfL, the London Boroughs, in the main, have demonstrated a total malaise and lack of planning in these areas. We would like the London Plan to **reflect and shape Local Authority thinking** for the provision of **sensible pick up and set down points** with appropriate regulations on yellow lines and red routes to support and facilitate true inter-modal transport interchanges. Furthermore **this should be reflected in Local Authority transport plans and UDP's.**

To this end section 3.207 of the proposed revised London Plan says **'Appropriate parking and / or drop-offs for disabled people should always be provided to ensure that developments are accessible for all. All large developments should provide for appropriate taxi ranks and coach / bus parking / stands. Appropriate provision should also be made for cycle and motor cycle parking'.**

As this misses 'Private Hire' out completely, we would like the document to take the example of former Transport Minister, Glenda Jackson when asked the following Parliamentary question by Linda Perham in 1999.

Ms Perham: To ask the Secretary of State for the Environment, Transport and the Regions what plans he has to provide taxi ranks at the Millennium Dome site.

Ms Glenda Jackson: The New Millennium Experience Company will be providing appropriate facilities for both taxis and minicabs at the Millennium Dome site.

The Minister was spot on when she said **'appropriate facilities for both taxis and minicabs'** and we would like to see **'appropriate facilities for both taxis and private hire'** embraced into London Plan wording.

We would also draw the Mayor's attention to fact that certain London Boroughs are 'out of touch' and have 'prejudiced views' when granting planning consents in town centres with regard to licensed Private Hire premises. These views are reflected in UDP's that cascade down into **poor planning policy.**

It is our view that such Local Authorities are inhibiting the potential service provision and the associated benefits of what by the end of the year will be a **fully licensed transport mode.**

The London Plan emphasises time and time again the need for **'local provision of public transport'** for local communities that draws its labour force from the local area. The Private Hire Industry **where located in sensible High Street or Interchange locations**, not only provides a service to compliment other modes but **often facilitates a 24/7 secure waiting area / safe haven.** Such premises are predominantly staffed by local labour.

Some Borough UDP's are at best **discriminatory** to our industry and in our view are completely ignoring local needs. At worst they are bigoted and stereotyped in their thinking towards the Private Hire sector, and this is 'in direct contradiction' to the goals set out in the London Plan.

Good Boroughs provide sensible planning rules and considerations, whilst others are out of sync with 'London wide' requirements. We hope that the London Plan will reflect the need to have Licensed Private Hire Offices given appropriate planning consents in Town Centres and at Transport Interchanges, **especially where public safety, transport requirements and demand reflects the need for positive attitudes on planning consents.**

Planning consent has in one recent case been refused in a London Borough where the premises are in a perfect location. Many nearby shops are empty and the Licensed Operator and the safe haven they provide to the public are ideally located to serve the local community.

This particular site has been refused planning consent on the basis that it is not within the local Borough's UDP, hopefully the London Plan can help to remove such outdated thinking. The case is now under appeal.

As you know Public Transport needs to be available where there is demand and ideally where there are appropriate provisions made to pick up and set down safely. We hope the London Plan's approved revisions will reflect this thinking and we are grateful for the opportunity to respond to this consultation.

Steve Wright MBE,
Chairman LPHCA