Response by the London Cycling Campaign to the consultation on reducing the maximum age limits for taxis

April 2019

About the London Cycling Campaign

London Cycling Campaign (LCC) is a charity with more than 20,000 supporters of whom 11,500 are fully paid-up members. We speak up on behalf of everyone who cycles or wants to cycle in Greater London; and we speak up for a greener, healthier, happier and better-connected capital.

LCC is a member of the Healthy Air Campaign (www.healthyair.org.uk), a coalition of household-name health, environment and transport organisations co-ordinated by Client Earth, that campaigns to clean up London's and the UK's air.

General comments

LCC welcomes the opportunity to comment on reducing the maximum age limits for taxis.

We strongly support plans to improve air quality in London by accelerating, from 15 to 12 years, the process of switching black cabs to Zero Emission Capable (ZEC) vehicles to forestall the Tfl forecast that black cabs could become the ' the biggest source of road transport NOx (nitrous oxide) emissions' in London. We trust that owners of a mode of transport that has been described as iconic have no wish to be best known for being a leading cause of air pollution.

Air quality is a serious matter for the capital with the majority of main roads in central London exceeding WHO (World Health Organisation) annual emission guidelines and an estimated 9,000 annual deaths related to air pollution. Air pollution affects not only pedestrians and cyclists but also drivers and their passengers. Professional drivers, such as black taxi owners, who spend all day in traffic are more exposed to harmful emissions than other Londoners.

We note with concern the data provided by Transport for London in the documents accompanying this consultation:

"We estimate that taxis currently contribute a quarter of all harmful road transport NOx emissions in central London. This is expected to increase further, and by 2020 taxis are likely to be the biggest source of road transport NOx emissions if we do not take additional action to clean the fleet. Taxis also currently produce 33 kilotonnes of Carbon Dioxide and 2.8 tonnes of harmful PM10 emissions (this information was taken from the London Atmospheric Emissions Inventory (LAEI) and TfL Taxi fleet data."

TfL also says:

"It is clear now that the target of 9,000 ZEC taxis or a 45 per cent reduction in harmful taxi NOx emissions will not be reached. In fact, we are on track to reduce taxi NOx emissions by less than 10 per cent by 2025, in breach of our legal obligations."

We note that TfL and central government are providing incentives for drivers to make the switch to ZEC vehicles and to install charging points at the homes or workplaces. It is well known that the cost of electricity to power electric vehicles is significantly lower than costs of fuelling similar sized vehicles with petrol or diesel.

Progress with other vehicle types

We note that both public service vehicles (PSVs), such as buses, and public hire vehicles (PHVs), such as Uber, have declared near term targets for switching to Zero Emission Capable (ZEC) vehicles.

Uber say that almost half their 40,000 drivers already use ZEC vehicles and it has a target of all vehicles to be ZEC or fully electric by 2020.

All double-deck buses in central London will be of the hybrid type this year and single deck buses will be fully electric or hydrogen powered by 2020. By 2037 all buses in London are expected to be zero emission.

Private vehicles, with the notable exception of black cabs, are already encouraged to switch to ZEC or other types of less polluting vehicles by the Ultra Low Emission Zone in central London and this is due to be extended to inner London by 2021.

For more detailed comments on our position in regards to the ULEZ, please see our previous submissions on this issue:

- Response from London Cycling Campaign to the proposed Ultra Low Emission Zone, January 2015 (http://bit.ly/ULEZ2015)
- Response by the London Cycling Campaign to the Mayor's Consultation the central London Ultra-Low Emission Zone, June 2017 (http://bit.ly/ULEZ2017).