

Appendix 3: Summary of stakeholder responses

This appendix provides summaries of the feedback we received from stakeholders. We condense detailed responses into brief summaries. The full stakeholder responses are always used for analysis purposes.

We sought views from a wide range of stakeholders using our stakeholder database, including stakeholder groups representing the interests of those with disabilities, those with a focus on women's safety and older people. We also sought the views of taxi driver groups. Responses were submitted by the following stakeholders:

1. Hackney Disability BackUp
2. London TravelWatch
3. Transport for All
4. Licensed Taxi Drivers' Association
5. Taxi Trade Tariff Group
6. Unite the Union
7. United Cabbies Group
8. Bolt
9. FREENOW
10. Cabvision
11. Hale Taximeters
12. Heathrow Airport Limited
13. Stop Killing Cyclists
14. CHAPRA
15. London Borough of Hammersmith and Fulham
16. Westminster City Council

Hackney Disability BackUp

Hackney Disability BackUp said:

- Taxi fares in London are very poor value for money
- The minimum fare should be frozen at £3.80
- Tariffs 1, 2 and 3 should be frozen
- The Heathrow extra should be reduced to £1.60

They said that their members report that the Taxicard scheme has to all intents collapsed, and they are informed that there are no drivers available when they call.

Hackney Disability BackUp said that when drivers do agree to come they frequently fail to turn up.

They also said that the extra charges are astronomical and some drivers refuse to accept credit card payments, even though it can be difficult for many disabled people to handle cash.

London TravelWatch

London TravelWatch (LTW) said that despite taxis making up a relatively small proportion of journeys, they play an important part in London's public transport network and can help people get around when other options are not available.

LTW said taxis can be particularly important in outer London where public transport options are more limited, and can be vital when travelling at night.

They said that most importantly taxis can provide door-to-door transport for people who face barriers to using other types of transport and have no access to private transport, and in light of this taxis can be particularly important to disabled and older people.

LTW said they understand the need to increase taxi fares given the rise in taxi drivers' costs and the falling number of taxis and taxi drivers. They said it was important to protect the number of remaining taxis but also said it was important to strike a balance between drivers being fairly paid and people getting fair and affordable fares. They also said that it is important that people are not priced out of using the service.

LTW said high fares and fare increases are likely to disproportionately disadvantage people who rely on taxis for accessibility or safety reasons, and if taxis are unaffordable people may choose less safe but cheaper options, or not travel at all. They said this adds more barriers to accessing things such as healthcare, employment and education. LTW would like to see mitigations put in place to reduce any negative impact on these groups.

LTW said mitigations should be considered in the structure of fare increases and called for Tariff 3 to be protected from high increases. LTW's research found that 31 per cent of people who reported feeling unsafe when travelling in London used taxis or private hire vehicles (PHVs). They did recognise that some differential between the tariffs provides an incentive for taxi drivers to work at night.

The mitigations LTW would like to see in place are:

- TfL to explore ways to make being a taxi driver a more attractive profession, and by doing so increase the number of licensed taxi drivers. While fare levels are an important part of this, other factors should be explored that do not add further costs on to passengers
- Extra support for Taxicard members. This could include freezing member contributions, allowing triple swiping and increasing the number of taxi drivers who can access Taxicard bookings
- Protecting night services, including the Night Tube and Night Bus
- Continuing to make other modes accessible
- Increasing the number of accessible PHVs

Transport for All

Transport for All (TfA) said:

- The minimum fare should be frozen
- Tariffs 1, 2 and 3 should be frozen
- The Heathrow extra should be reduced to £1.60

TfA said they were deeply concerned about the proposed increases to taxi fares and the disproportionate impact on disabled people.

They said disabled people are already facing significantly higher living and transport costs, and rely on taxis as a vital service due to the inaccessibility of much of London's public transport. They said that raising fares will exacerbate existing inequalities, further isolating disabled people and restricting their access to employment, education, healthcare and other essential services.

TfA said the cost of living crisis has hit disabled people particularly hard. While they recognised that taxi drivers face increasing operating expenses, passing these costs on to disabled passengers, who already face significant barriers, is unacceptable and risks compounding existing inequalities.

TfA also said that disabled people already face discriminatory practices when using taxis, such as running the meter for the time it takes to load a mobility aid. They said that any changes to fares should be paired with the strengthened enforcement of driver obligations to ensure fair and equitable treatment.

TfA said their research highlights that cost is the most frequently experienced, and disabling barrier to using taxis for disabled people. Many respondents to TfA's research called for reducing taxi costs or expanding concessions such as the Taxicard scheme.

TfA said the consequences of fare increases for Taxicard members would be particularly severe. Members would reach the capped fare limit more quickly, forcing many to make fewer journeys or travel shorter distances. They said that with driver availability already a significant issue, this could further reduce the willingness of drivers to accept Taxicard jobs. TfA also said that some of their members report that return journeys are being treated as two swipes, halving their travel allowance. They said that without further funding for the Taxicard scheme disabled users risk losing vital access to transport.

To mitigate the potential negative impacts on disabled people TfA made the following recommendations:

- Increase funding for the Taxicard scheme
- Address Taxicard issues such as return journeys being treated as two swipes
- Invest in accessible and affordable public transport options to reduce the reliance on taxis
- Implement targeted financial support for disabled passengers (e.g. subsidies or capped fares for accessible journeys)
- Strengthen enforcement against discriminatory practices (e.g. starting the taximeter early and overcharging disabled passengers)
- Engage directly with Londoners to co-design and implement solutions that address affordability and ensure taxi services meet their needs

Licensed Taxi Drivers' Association

The Licensed Taxi Drivers' Association (LTDA) submitted a separate response about the fixed-fare, shared-taxi scheme that operates during the Wimbledon Tennis Championships. They requested that the fixed-fares from the tennis to central London are increased by £1.50.

They said this would be in the best interests of passengers and drivers in 2025, in order to maintain a balance between supply of taxis and customer value.

Taxi Trade Tariff Group

The Taxi Trade Tariff Group (TTTG) said their preference was for option 3 – this would be a 40 pence increase to the minimum fare and 5.05 per cent increase to Tariffs 1, 2 and 3.

The TTTG also said:

- Option 3 reflects the total Cost Index figure of 7.48 per cent, and any departure from the figure indicated by the Cost Index would result in disequilibrium and unfairly penalise either drivers or passengers
- Changes lower than the Cost Index would mean drivers were unfairly penalised and for this reason only options 1, 2 and 3 would produce equilibrium between driver income and passenger fares, and maintain the tariff at a just level to maintain drivers' income
- They said that option 4 would result in a fall in drivers' real income, and options 5, 6 and 7 would reduce drivers' real and nominal income
- The TTTG said that anything less than a 7.48 per cent increase would exacerbate the existential problem of falling taxi driver and vehicle numbers

The TTTG made the following comments on balance and ability to pay:

- The TTTG said that while the Finance Committee rightly considers the balance between drivers' ability to earn a fair return and passengers' ability to pay, equilibrium is found by the outcome of the Cost Index
- They also said that the Finance Committee rightly consider that those passengers least able to withstand increases are the ones who are most dependant on the taxi service (elderly and disabled passengers). While the taxi trade is not uncaring about these passengers, restricting the tariff to less than the total Cost Index figure would not solve any problems for these people
- The TTTG said the Taxicard scheme consistently suffers year-on-year service deterioration due to drivers being forced to give a 10 per cent fare discount to Taxicard members, and this is evidence that a general fare discount would have a negative effect on service levels
- They said that if a decision was taken to restrict a tariff increase it would not be equitable, as this would mean taxi drivers subsidising not only the least able to pay but also those most able to pay. The TTTG said as an example if option 6 was implemented taxi drivers would be subsidising low-income passengers by 3.31 per cent but also high earning passengers and this cannot be fair

The TTTG made the following comments on alternatives to assist those least able to pay:

- There are two basic ways fares can be reduced without reducing tariff increases
- There could be a direct subsidy for those least able to pay, this already exists as the Taxicard service and this could be expanded or increased. This could be financed by society at large. It could also be financed by taxi drivers but

this would be inequitable and could also create problems with regards to taxi drivers accepting these jobs

- Another option would be to consider the cost of congestion on taxi fares in general. Traffic flows in London have worsened over the last decade and the longer a taxi journey takes the more expensive the taxi fare
- The congestion part of taxi fares could be reduced by allowing 'taxis to go where buses go' and this would reduce the overall fare
- The creation of low traffic neighbourhoods (LTNs) has a disproportionately negative impact on taxi fares for old and disabled passengers. An example is the journey from Moorfield's Eye Hospital into the Islington LTN which can be 50 per cent more if the passenger is not able to walk from the edge of the LTN to their destination
- Increased access for taxis would negate the impact of a 7.48 per cent tariff increase, and in the case of access to LTNs would target the fares of old and disabled passengers
- This offers an alternative to an increase below the Cost Index figure

Unite the Union

Unite the Union (Unite) said:

- Taxi fares in London are very good value for money
- The minimum fare should be increased by 40 pence to £4.20
- Tariffs 1, 2 and 3 should be increased with the total Cost Index figure (+7.48 per cent) used
- The Heathrow extra should be left at £2.00
- The Heathrow drop off charge should be increased to £6.00

Unite also made the same comments as the TTTG.

United Cabbies Group

The United Cabbies Group (UCG) said:

- Taxi fares in London are good value for money
- The minimum fare should be increased by 40 pence to £4.20
- Tariffs 1, 2 and 3 should be increased with the total Cost Index figure (+7.48 per cent) used
- The Heathrow extra should be left at £2.00
- The Heathrow drop off charge should be increased to £6.00

The UCG also made the following comments:

- Disabled passengers tell the UCG they are constantly being designed out of urban environments and this has accelerated at pace since a number of road schemes were implemented during the coronavirus pandemic and then retained to enable the Mayor to achieve net zero targets for 2030
- The consultation says that TfL tries to try to strike a balance between drivers being fairly paid and passengers being charged a fair and affordable fare. Fares are measured on time and distance so restrictions on access for taxis extends journey times and this impact is not taken into consideration in the UCG's view

- Road access currently denied to taxis needs to be reviewed as a matter of priority as this goes hand in hand with keeping taxi fares affordable for passengers
- The number of taxis and taxi drivers in London is falling at an unsustainable rate, with a loss of around 1,000 drivers per year between 2012 and 2024, and a 37 per cent fall in the number of taxis
- Licensed taxis are the capital's only door-to-door, fully accessible service. One third of Tube stations and half of Overground stations are currently step-free. This is why so many passengers with mobility issues rely on taxis for crucial journeys
- Since the pandemic a number of TfL and borough road schemes have restricted road space for taxis or removed appropriate kerbside access. The UCG do not share the view that licensed taxis should be removed from roads that buses can use. They said this has consequences for those who rely on licensed taxis
- The UCG said there is currently a situation where three of the mainline stations have restrictions on the surrounding roads impacting taxis getting to waiting passengers or leaving the station and ensuring the journey time and cost is not increased due to unnecessary circuitous routes which increase fares but which could be avoided. They said it is essential that the tariffs are not looked at in isolation
- The UCG said that a number of key journeys are made from London's mainline stations, as passengers with booked assistance are accompanied to the taxi rank for their onward travel. They said that when a passenger is returning to a mainline station to meet their booked assistance the additional time to undertake the journey to the station due to the restrictions on access for taxis has consequences and if passengers miss their train they also have to buy a new ticket. They said this can be avoided by an inclusive approach to transport planning
- The UCG added that there are restrictions on Bishopsgate, Bank Junction and Tottenham Court Road in key through-routes where Tube stations are not step free or where the route has journeys from mainline stations to hospitals (e.g. UCH, Macmillan Cancer Centre and Guy's). They also said the journey times and increased costs disproportionately impact disabled passengers, older passengers, pregnant passengers and those who are vulnerable
- The UCG said that cycling infrastructure and encouraging active travel should not be at the expense of accessibility. They said the same zeal should be used to ensure those inequalities do not exist, and barriers should be removed for passengers. This should include making road infrastructure and access for those delivering services fit for purpose and keeping costs affordable

Bolt

BOLT said:

- The minimum fare should be increased by 20 pence to £4.00
- Tariffs 1, 2 and 3 should be increased with the change in taxi drivers' operating costs figure (+4.17%) used
- The Heathrow extra should be left at £2.00
- The Heathrow drop off charge should be increased to £6.00

Bolt said that if taxi fares are increased they support a corresponding increase in Taxicard member allowances to ensure users can continue accessing the programme at the same level as in 2024. Bolt said without this adjustment Taxicard members would face a reduction in the number of subsidised journeys they can make, and this could negatively impact their mobility and independence.

FREENOW

FREENOW said:

- Taxi fares in London are very good value for money
- The minimum fare should be frozen at £3.80
- Tariffs 1, 2 and 3 should be increased with the total Cost Index figure (+7.48 per cent) used
- The Heathrow extra should be left at £2.00
- The Heathrow drop off charge should be increased to £6.00

They also made the following comments:

- Taxi fares provide truly excellent value for money in London, given the high quality of service drivers offer via their specialist vehicles, all of which are wheelchair-accessible, which is particularly important for those who may face physical or other barriers (e.g. those with disabilities, the elderly and parents with small children) when accessing alternative forms of transport
- They agreed that taxis provide a reliable and trusted service to Londoners and visitors, offering passengers a safe and convenient service, aided by drivers' extensive knowledge of the capital's streets, and said they also play a crucial role late at night while many other modes may stop running or there may be long waits for them
- They said passengers' perceptions of taxis may be negatively impacted by the effects of increased congestion, delays, detours and increases in journey times. They said this can lead to passengers being charged higher fares than might have been the case previously, and these experiences may deter some prospective passengers from using taxis
- They said the principal causes of these issues include:
 - Reductions in road capacity, but this might increase if taxis were allowed to use all bus lanes
 - Speed restrictions
 - Road closures, traffic restrictions and access for taxis. They added that LTNs were introduced during the pandemic and remain in place but undermine the value of the wheelchair accessible nature of London's taxis
 - The huge number of roadworks
- FREENOW said that despite these challenges taxi passengers consider taxis offer value for money, they referred to the 2023/24 TfL Taxi and Minicab Passenger Customer Satisfaction Survey (CSS) in which passenger gave a score of 73 out of 100 for value for money, which equates to 'fairly good'

On the taxi fare and tariff options FREENOW said:

- They support option one and increasing Tariffs 1, 2 and 3 by 7.48 per cent

- Limiting the increase to the change in taxi drivers' operating costs (+4.17 per cent) would not be fair to taxi drivers. They noted that the TTTG arrived at the same conclusion
- They support Tariff 2 applying to all journeys of six miles or more and in effect dispensing with Tariff 4. They noted that the TTTG supported Tariff 4 increasing by 7.48 per cent and FREENOW said there was a strong case for Tariff 4 becoming permanently subsumed within Tariff 2 as it would simplify the taxi fare system
- FREENOW said that applying Tariff 3 to Saturday and Sunday between 20:00 and 22:00 should be considered. They said the objective of this would be to ensure a better remuneration for drivers and also motivate them to work during periods of higher demand. They said that this change and the increase in the number of taxis during weekend evenings should support TfL's safer travel at night initiative. They thought it may also help retain existing taxi drivers, encourage those who have recently left the taxi trade to return and serve as a recruitment tool for new taxi drivers
- FREENOW said they did not consider the minimum fare appropriate. They would like to see a minimum fare introduced that apps and radio circuits would be permitted (but not mandated) to charge on behalf of taxi drivers. The reason for this is that taxi drivers may have to drive 10-15 minutes to pick up a passenger when they accept a job via an app or radio circuit and drivers may be less likely to accept some of these jobs. FREENOW suggested £10 tends to be a tipping point for taxi drivers. They said that introducing this could improve acceptance rates

On the booked taxi extra FREENOW said:

- This should be increased to £5.20 and then reviewed annually
- They anticipated that for most booked taxi journeys less than £5.20 would be charged
- They said it was important that businesses such as FREENOW had the ability to vary the amount of the extra as not all bookings are equal, and some may be more complex
- £2.00 does not cover the cost of the more complex bookings
- They said the booked taxi extra was an important component in allowing FREENOW to provide a fast, safe and high-quality service
- They also said that taxi drivers being able to charge the booked taxi extra is problematic with passengers being charged it twice and this should be looked at as a matter of urgency

On cancellation fees FREENOW said:

- They were disappointed that introducing a cancellation fee was not considered in the annual fare review
- They said a passenger who booked a taxi could currently be charged £5.80 (£3.80 minimum fare plus £2.00 booked taxi extra) and it seems reasonable that when a booked taxi is cancelled that there should be some recompense amounting to but not exceeding the sum of the minimum fare and booked taxi extra
- FREENOW said the introduction of a cancellation fee would be fairer to drivers and would improve the supply situation

- FREENOW is strongly in favour of the explicit inclusion of a cancellation fee in the Cab Order and applied when a passenger:
 - Decides to cancel the order two or more minutes after the taxi driver has accepted the request
 - Does not arrive within five minutes of the taxi arriving, and the taxi driver having to cancel the request
- They said cancellation fees constructed in this way are a market standard worldwide in the private hire sector and should apply to London taxis
- The fees are a minor source of earnings but play a critical role in maximising utility rates of drivers and vehicles, and minimising dead mileage
- They said cancelled rides create congestion, unnecessary emissions and reduce drivers' earnings
- FREENOW shared suggested text on a cancellation fee for the Cab Order

FREENOW also said increasing the soiling charge to somewhere between £80 to £150 seems reasonable.

Cabvision

Cabvision provides taximeters and card payment devices to taxi drivers, and also rents taxis to taxi drivers.

Cabvision said none of the seven options reflected their views.

They thought that making the Tarif 4 rates the same as the Tariff 2 rates last year was a mistake. They were concerned that applying a 7.5 per cent increase across all tariffs could be an error.

They thought that the 'back end' of the meter was excessively expensive, and increases should be concentrated on the 'front end'.

They think the tariffs should be simplified and submitted a proposal with two tariffs.

Hale Taximeters

Hale is a taximeter company and they said:

- Taxi fares in London are good value for money
- The minimum fare should be increased by 20 pence to £4.00
- Tariffs 1, 2 and 3 should be increased with the change in taxi drivers' operating costs figure (+4.17%) used
- The Heathrow extra should be reduced to £1.60
- The Heathrow drop off charge should be reduced so it is less than £5.20

Heathrow Airport Limited

Heathrow Airport Limited (HAL) said taxi drivers should be able to pass on the full cost of the taxi feeder park fee to passengers. HAL are reviewing the taxi feeder park and will keep TfL updated on this process.

HAL also said taxi drivers should be able to pass on the full cost of the terminal drop-off charge to passengers and supported the drop off charge being increased to £6.00.

Stop Killing Cyclists

Stop Killing Cyclists wanted the exemption from the Congestion Charge to be removed from taxis, apart from for registered disabled passengers.

They said it was unfair that working class drivers have to pay the charge, but rich executives using private transport for hire are exempt.

Stop Killing Cyclists said that taxis are one of the single largest sources of central London congestion, disproportionately impacting negatively on the 99 per cent of people using other transport each day in London.

They said taxi congestion impacts negatively on working people, pensioners, disabled people and low waged people who walk, use the bus or cycle in central London.

They also said that the funds raised could be used to fund fare cuts for people on Universal Credit, and the faster rollout of protected cycle lanes and LTNs.

CHAPRA

CHAPRA is a residents' association in the London borough of Sutton. They said:

- Taxi fares in London are OK value for money
- The minimum fare should be frozen
- Tariffs 1, 2 and 3 should be increased with the change in taxi drivers' operating costs figure (+4.17%) used
- The Heathrow extra should be reduced to £1.60
- The Heathrow drop off charge should be increased to £6.00

They also asked if TfL had considered having a card for regular taxi users which gives them a five or 10 per cent reduction on taxis fares, and also as a way of increasing the use of taxis.

London Borough of Hammersmith Fulham

Hammersmith & Fulham Council said:

- Taxi fares in London are OK value for money
- The minimum fare should be frozen
- Tariffs 1, 2 and 3 should be frozen
- The Heathrow extra should be reduced to £1.60
- The Heathrow drop off charge should be removed

London Borough of Hammersmith and Fulham said that they believe regulated taxi fares are too high in relation to competitors.

They do not believe the current regulations serve taxi drivers or other operators very well and that regulatory change should do three things:

1. Create a level playing field
2. Support employment rights
3. Incentivise fleet electrification

They said that lowering the charge when taking a taxi from Heathrow Airport directly benefits passengers by reducing the overall cost. This is particularly important for frequent travellers and those on a smaller budget, and reducing the surcharge aligns with the council's commitment to minimising fare increases and ensuring taxis remain a viable and safe transport option.

London Borough of Hammersmith & Fulham said the Heathrow drop off charge raises concerns, particularly for vulnerable groups who rely on taxis as an increase could exacerbate the financial burden on them. They said it was crucial to consider the additional cost implications for disabled passengers who may already face higher living expenses. They also said that a higher drop off charge could deter women from using taxis, potentially compromising their safety, and that it is important that transportation remains accessible and affordable for women.

London Borough of Hammersmith & Fulham said consideration should be given to the subsidy rates that apply to each tariff through the Taxicard scheme, and extending the availability of taxis for Taxicard members.

London Borough of Hammersmith & Fulham said the disproportionate impact on disabled and vulnerable people who rely on taxis was of particular concern. The council was concerned about the difficulties local disabled people experience using taxis and requested that TfL review and improve this. They said there were also concerns about the disproportionate impact on women who may feel less safe using other modes or walking, particularly late at night. The council were therefore more supportive of the options that minimise fare increases.

They also mentioned how the fare review aligns with the council's strategic objectives and climate change strategy.

London Borough of Westminster

London Borough of Westminster said:

- The minimum fare should be increased by 40 pence to £4.20
- Tariffs 1, 2 and 3 should be increased with the total Cost Index figure (+7.48 per cent) used
- The Heathrow extra should be left at £2.00
- The Heathrow drop off charge should be increased to £6.00

London Borough of Westminster pressed TfL to ensure support continued for vulnerable residents who depend on taxis through the Taxicard scheme.

They said all recognise that Taxicard is vital for less mobile residents on lower incomes. They welcomed there being no proposed changes to Taxicard.