



Karol Jakubczyk
Planning Service
Epsom & Ewell Borough Council
Town Hall, The Parade
Epsom KT18 5BY

2 February 2018

Dear Mr Jakubczyk,

REPRESENTATION ON BEHALF OF THE LICENSED TAXI DRIVERS' ASSOCIATION- APPOINTMENT AND REVOCATION OF HACKNEY CARRIAGE STANDS, EPSOM HIGH STREET

I am writing on behalf of the Licensed Taxi Drivers' Association (LTDA) to register an objection to the measures stated above, as advertised in the Sutton & Epsom Guardian. Our comments on the measures are stated in further detail below.

The LTDA has served as the professional and authoritative voice of licensed taxi drivers for 50 years. We are committed to ensuring that our member's voices are heard, protecting trade and maintaining the high professional standards that have become synonymous with taxi drivers. We look forward to fostering a positive working relationship with Epsom and Ewell Borough Council going forward.

Lack of consultation

The LTDA believes that measures such as these involving the relocation of taxi ranks ought to be justified through transparent and publicly-accessible rationale, following thorough consultation with affected stakeholders. Regrettably, this does not appear to have taken place prior to the enactment of the measures in question. The LTDA did not receive advance notice of the relocation, despite being the major representative body for licensed taxi drivers. Moreover, the documents made available to the public following the meeting of the Epsom and Ewell Local Committee in which the relocation was approved provides no accompanying rationale for the relocation of the taxi rank. It is unclear how, if at all, the relocation of the rank to the new location has been justified.

Additionally, it is the LTDA's understanding that, when the broader scheme of the Epsom Plan E Highway Improvements, under whose auspices the measures in question fall, were enacted, the list of stakeholders who were notified was based upon a previous list of consultees drawn up during the development of Surrey County Council's Local Plan. The LTDA is not included in this list, again despite being the major representative body for the licensed taxi trade, and as a result was not given an opportunity to provide feedback on the original plans. In sum, both the consultation and rationale for the relocation of the taxi rank were insufficient.

Accessibility

The LTDA is concerned that the relocation of the taxi rank to the section of the street between 112 and 122 High Street (hereafter referred to as "the new location") will result in the loss of a convenient, safe and accessible means of transportation around Epsom and Ewell. Taxis play a crucial role in the local public transportation system, as the only fully accessible form of transportation available. Black cabs are 100% wheelchair-accessible and guide dog-friendly – the only form of public transport that is. However, the relocation of the taxi rank to the new location on the opposite side of



street means that wheelchair-using passengers will have to cross a busy road in order to access the rank. This poses significant danger, in addition to being less convenient and comfortable. The LTDA does not consider this to be an equitable or desirable situation, which could have been avoided if thorough consultation with the trade had been undertaken prior to the enactment of the measures.

In addition, the relocation of the rank further away from the central amenities of the nearby shops and clock tower market imposes additional inconvenience on disabled passengers and makes it harder to travel along the High Street. The location must be reconsidered in light of this.

Safety

Licensed taxis are amongst the safest transport modes on the streets of Epsom and Ewell, providing a convenient door-to-door service for passengers. However, the relocation of the taxi rank to the new location puts passengers at increased risk of involvement in a collision with a vehicle by moving it to a less accessible and desirable location. The previous location of the rank, being segregated from the traffic movements of the busy A24 road, was preferable as it significantly reduces the risk of collision between vehicles and pedestrians. Additionally, although the new location is relatively well-served by pedestrian crossings, this crossing will be relocated several metres away to opposite Café Rouge, imposing additional inconvenience on access to the taxi rank. This is likely to result in pedestrians attempting to cross the road on parts of the street that are not designated for crossings, putting themselves at risk of danger and increasing risk of collision with vehicles.

Impact on trade

The taxi rank in its previous location was well-frequented and provided a convenient drop-off and pick-up point for passengers, being in close proximity to amenities such as NatWest Bank, the clock tower and surrounding market, as well as numerous shops. It was well-placed to serve the needs of passengers and visitors, and as a result was a source of significant trade and fares for local licensed taxi drivers. The relocation of the rank to an area with reduced footfall which is less accessible will result in taxi drivers losing potential fares and will harm the taxi trade. The location also suffers from a loss of visibility, with the new rank obscured behind a large hedge alongside the market which means that taxis will not be in view of people leaving the shopping centre and market. The LTDA's members locally fear that the resulting loss of trade will mean that providing a service in Epsom Town Centre may not continue to be viable. In addition to the troubling implications to the trade, this reduces the range of options available to passengers and decreases the attractiveness of Epsom High Street as a retail destination.

It has been suggested to the LTDA that the relocation of the rank will further the interests of the trade because the rank in its previous location was often wrongly used by local private hire vehicle operators. However, the issue of taxi ranks being used by private hire vehicles is a failure on the part of Epsom and Ewell Borough Council to enforce existing restrictions. This issue is likely to be worsened under the existing measures. The LTDA does not, therefore, consider this to be a sufficient response.

Air quality

The LTDA commends the ambition of the Council to improve air quality along Epsom High Street by reducing emissions and harmful gas particulates. The LTDA has been at the forefront of efforts to reduce pollution and fundamentally supports this ambition. New models of zero-emissions capable taxis were officially launched earlier this year and will support the ambition of local, regional and national government to improve air quality. However, measures such as these which threaten the viability of the taxi trade by resulting in a loss of fares threaten the roll-out of zero-emissions capable taxis: since the new models cost £56,000 after subsidies, take-up will be limited by a lack of business



confidence amongst drivers who face a loss of fares. In the long-term, therefore, the “greening” of the local taxi fleet, and improvements in air quality, will be delayed.

Conclusion

The LTDA has chosen to object to the measures on the following grounds: the lack of consultation with the taxi trade; the impact on accessibility; the impact on safety; and the impact on trade. It looks forward to continued working with Epsom and Ewell Borough Council in order to develop a solution which better serves the interests of taxi drivers, passengers and the wider public.

Please do let me know if you have any questions about the response, or wish to discuss in further detail the issues raised therein.

Yours Sincerely,

A handwritten signature in black ink, which appears to read "Richard Massett". The signature is fluid and cursive, with a long horizontal stroke extending from the end.

Richard Massett

Chairman of the Licensed Taxi Drivers' Association