

# CAA Consultation (CAP 1364)

## HEATHROW

### Heathrow express (HEX)

We believe the Heathrow express (HEX) has a dominant position, and engages in anti-competitive behaviour at Heathrow Airport. HEX has several points of interaction with passenger's airside before they reach the arrivals hall let alone the taxi rank. Most seriously, there are screens in baggage halls providing misleading comparative information regarding Licensed Taxi journey times and prices as compared with those of HEX. Furthermore, HEX employs personnel to man desks, again airside, advertising and incentivising their directly competing service. This is a clear abuse of 'upstream' dominance. They use these opportunities to sell their product to the detriment of other onward travel providers. They also use misleading advertising to portray their product as the best choice when often that is not the case. This we believe, has been allowed to happen because HEX is wholly owned by LHR airport Ltd.

### Heathrow ambassadors

HAL's information staff more commonly called Heathrow ambassadors are often found to be unqualified when it comes to giving impartial advice to passengers for onward travel. This could have something to do with financial inducements being offered to them by some providers. On many occasions members of the licensed London taxi trade have found them to be giving misleading information which is to the detriment of London's taxi trade. This we believe is caused by inadequate training given to them, this leads to them quoting a Taxi fare to Marble Arch at £150 instead of the actual fare of £63. Moreover, Licensed Taxi prices and information are clearly posted on all ranks.

### Hotel reservation/tourist information desks

The hotel reservation desks which also act as tourist information are biased in the advice they give to passengers. They will often exaggerate the cost of a London black taxi and offer their own car service as a cheaper option even though it is often more expensive.

### Taxi/private hire competition

Passengers arriving at Heathrow have an abundance of choice from London's world famous black taxis, who clearly display their prices on every rank, two HAL preferred private hire firms as well as two chauffeur car service & a price comparison website for private hire. The Law Commission recommendations (LAW COM no347) Airports 4.106 .....Taxis should have guaranteed, equal access to airports.....nor should taxi drivers have to pay to work in these areas. At present London taxis do have to pay to work at Heathrow.

## **Terminal forecourts**

Heathrow's forecourts are absolutely lawless. Insufficient enforcement of them has led to an anarchic & unruly situation with private hire drivers breaking byelaws by waiting and picking up passengers on the forecourts. This is in breach of bye law

### [3.29 Loading of private hire vehicles](#)

No person shall cause or permit a Private Hire Vehicle to load passengers at the Airport other than in an official car park.

This gives them an unfair cost advantage by avoiding car park charges. This contumacious behaviour also leads to difficulties to safely drop off passengers (especially wheelchair users) due to private hire cars waiting to pick up. It is not unusual for others to have to double park when dropping passengers off. Heathrow airport ltd have seriously let down passengers when it comes to forecourt enforcement, this problem needs to be tackled as a high priority.

## **Authorised Vehicle Area (AVA)**

Heathrow airport ltd has recently announced their intention to open an AVA, which is a car park for private hire vehicles to wait for work. When it was first mentioned, its intention was to be a waiting area for private hire cars who already had a booking. HAL has now decided that it will also be for those who are hoping to receive a booking. This is an open invitation to private hire drivers to come to the airport in the hope that they may get a booking that possibly will not materialise. This will mean thousands of extra empty cars coming to the airport which will not only cause extra congestion but also greater pollution.

HAL are doing this at a time when they are supposed to be dissuading traffic from the airport and all for quick easy money. We believe that if HAL is allowed to open up the provision of onward travel to all comers it will very quickly lead to chaos in the form of sharp practice, touting, dangerously poor standards and poor customer service. We believe the Licensed London Taxi service provides a high quality, safe and competent service for customers but is in danger of being undermined by misleading advertising and anti-competitive behaviour by HAL.

PHV waiting anywhere on Heathrow airport without a pre-arranged booking are plying for hire, and it is the opinion of the Licensed Taxi service that HAL are encouraging and facilitating Private Hire drivers to do just that.

Paul Brennan

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Licensed Taxi Drivers Association