



Submission to TFL Pedicabs Consultation

Heart of London Business Alliance (HOLBA) represents over 500 businesses and property owners across London's West End — including Piccadilly, St James's, Haymarket, and Leicester Square.

HOLBA has worked closely with Transport for London over the past year in the development of this regulatory framework, and we warmly welcome both the introduction of the enabling legislation and the positive steps taken through the consultation process.

We support the establishment of a robust and enforceable licensing regime for pedicab vehicles, drivers and operators that raises standards, protects visitors, and safeguards amenities in central London.

We particularly welcome:

- The proposed ban on externally amplified audio, which has long caused nuisance to residents and businesses.
- The annual licensing of all drivers, to include medical and criminal record checks and the requirement to have relevant insurance, to drive up safety and professional standards.
- The introduction of annual licensing inspections, with pedicab vehicle licences to last for up to 12 months.
- The proposal for a more transparent fare structure system.

These are important steps towards a professional, safe and well-managed pedicab sector.

Our specific comments on the detailed licensing requirements are as follows:

Enforcement

TfL's proposed powers to suspend, revoke or impound licences are welcome, as is the ability for TfL Authorised Officers and police officers to carry out inspections. However, the draft regulations do not specify who will lead enforcement, how it will be resourced, or how joint working with the Metropolitan Police and Westminster City Council will operate — particularly for late-night activity in the West End.

There is also uncertainty around enforcement outside the licensing regime, including unlicensed pedicabs or breaches by non-compliant operators. Clear guidance here is essential to ensure a smooth transition from the current unregulated environment and to prevent illegal activity continuing in parallel with licensed operations.

There is a clear case for TfL to set out an enforcement strategy – clarifying roles, funding and priorities – alongside a penalty schedule and escalation system to provide consistency and strengthen on-street management.

Street Management

The proposal for pedicabs to operate primarily through street hailing — without formal ranks or waiting areas — risks leading to the formation of informal ranks in busy West End locations such as Leicester Square, Covent Garden, and Shaftesbury Avenue.

Although pedicabs may be pre-booked, most journeys function as point-to-point trips, with drivers waiting near popular venues until hailed. In practice, this means that true street hailing will remain limited. Even with instructions for drivers to stop only where it is safe and permitted, activity is likely to concentrate in high-footfall areas — as it does currently — creating potential congestion and obstruction within the public realm.

Without designated waiting or pick-up areas, pedicabs will continue to obstruct pavements, since they cannot wait on the carriageway.

To manage this effectively, we urge close collaboration with Westminster City Council to identify safe and practical locations for pedicab pick-up and drop-off, such as existing loading bays or designated kerbside spaces. Strong and consistent enforcement will be required to prevent pavement obstruction and keep pedestrian and traffic flows moving.

Fares Governance

HOLBA welcomes TfL's proposal to regulate pedicab fares based on journey time, including a per-minute rate, minimum fare, and consistent additional passenger charge. These measures will improve transparency and reduce disputes.

To make the system effective and enforceable, there is a clear case for requiring both operators and drivers to maintain verifiable records of all journeys — whether hailed or pre-booked — including journey time and fare charged.

We also urge a commitment to a regular, published review of fare data to monitor compliance, ensure fares reflect real operating conditions, and prevent misuse of the time-based system. The review process must be explicit, data-led, and include checks on individual driver and operator records.

Licensing and Identification

HOLBA strongly supports the introduction of driver licensing, photo ID badges and visible vehicle plates as important steps toward accountability and professionalism.

We are pleased that drivers will have to hold a valid DVSA theory test certificate and ask that consideration be given to drivers also having to secure a practical test certificate.

The inclusion of a driver's photo on ID badges is also particularly welcome, as it will help prevent cases of informal licence or identity swapping.

Licence Checker

The introduction of an online pedicab licence checker is an important step in building transparency and public confidence, particularly for visitors who may be unfamiliar with pedicab operations in the West End.

We encourage TfL to ensure that the checker is simple, mobile-friendly and integrated with vehicle and driver identification plates — for example through a QR code linking directly to the licence record.

Noise and Amenity

The proposed ban on externally amplified audio will significantly reduce disturbance in the West End. While we recognise TfL's openness to considering "alternative proposals" for passenger experience, any such scheme must uphold the ban and maintain strict noise limitations.

While we recognise the need for flexibility, we strongly advocate that any approved alternatives be subject to clear criteria, location-specific controls, and robust enforcement to prevent a return to the historic noise nuisance associated with pedicabs.

Awareness Campaign

The success of the licensing scheme will depend not only on enforcement but also on public understanding and awareness. Without clear communication, visitors and residents may continue to use unlicensed pedicabs or remain unaware of how to identify legitimate, compliant operators.

We urge TfL to lead a comprehensive awareness campaign, delivered through PR and marketing activity and supported by partners to maximise reach. This should include on-street signage, visitor information points, and digital assets across the West End, alongside materials for businesses and hospitality venues to share with customers.

Implementation

A clear and phased implementation plan is essential to manage registration, fees, inspections and enforcement effectively from the outset.

Conclusion

HOLBA supports TfL's direction in creating a fair, safe and regulated pedicab system. To succeed, the scheme must be enforceable, transparent, communicated effectively and actively managed — with clear accountability on fares, compliance and enforcement.

We thank TfL for its extensive engagement over the past two years and look forward to continuing to work together with TfL, Westminster City Council and the Metropolitan Police to ensure that pedicabs can safely operate in the West End experience while maintaining public safety and amenity.