Brighton and Hove City Council

Hackney Carriage Demand Survey

Final Report

October 2009

Halcrow Group Limited

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Contents Amendment Record

This report has been issued and amended as follows:

Issue	Revision	Description	Date	Signed
1	0	Draft Report	02.09.09	SP
1	1	Final report	01.10.09	KK

Contents

1 Study Objectives and Overview

1.1 General

1.1.1 This study has been conducted by Halcrow on behalf of Brighton and Hove Council in pursuit of the following objectives:

- to identify whether or not there exists a significant unmet demand for hackney carriage services in Brighton and Hove;
- to recommend the increase in licences required to eliminate any significant unmet demand; and
- to assess any significant unmet demand for disabled access hackney carriage vehicles at ranks and telephone booked demand.

1.1.2 In 2006 the DfT produced 'Best Practice Guidance' for taxi licensing. The guidance also restated that the DfT considers it to be best practice not to impose quantity restrictions. However where restrictions are imposed, the Department urges that the matter is regularly reconsidered.

1.1.3 The DfT guidance is just that, guidance. We are unaware of any actual (or proposed) change in legislation that would affect the legal standing of an entry control policy in the context of local hackney carriage markets. The large body of well established case law and precedent should be unaffected by this guidance. Notwithstanding this, the local authority may wish to take this guidance into consideration when determining its policy, particularly given the forthright way in which DfT chooses to express its views on entry control in Paragraph 31:

'Most local licensing authorities do not impose quantity restrictions; the Department regards that as best practice.'

2 Background

2.1 General

2.1.1 This section of the report provides a general background to the taxi market in Brighton and Hove and the relevant legislation governing the market. This section of the report also provides a background to relevant local policy.

2.2 Relevant Entry Control Regulations

2.2.1 Under the Town Police Clauses Act 1847, a licensing authority had an unfettered discretion to limit the number of hackney carriage licences by being able to licence only such numbers as it thought fit. It was a power, which was widely used by many authorities to restrict the numbers of hackney carriages for the purpose of exercising control and supervision over them. Under the Transport Act 1985, the position in law changed and the 1847 Act, as now amended by Section 16, provides as follows:

"That the grant of a licence may be refused for purposes of limiting the number of hackney carriages…, if but only if, the person authorised to grant a licence is satisfied that there is no significant demand for the services of hackney carriages… which is unmet".

2.2.2 The Act also provides for an appeals procedure whereby unsuccessful applicants for hackney carriage licences may call upon an authority to demonstrate that it is satisfied that there exists no significant unmet demand. If, in the eyes of the Court, the Authority fails to meet this requirement, the appeal against the refusal to issue a licence will be successful.

2.3 Brighton and Hove Overview

2.3.1 The City of Brighton and Hove is situated on the south coast of England and has a population of 247,800 (Census 2001). The area is a popular holiday destination and attracts approximately eight million visitors a year. Brighton and Hove has a very healthy night time economy with numerous bars and nightclubs situated in the town centre that have late licences of between 1am and 4am.

2.4 Background to the Hackney Carriage Market in Brighton and Hove

2.4.1 Brighton and Hove limits the number of hackney carriages. At the time of the study commenced the level was set at 523 with an additional five wheelchair accessible licences issued annually. The five licenses for 2009 were released in May 2009 bringing the total provision up to 528. This gives a level of hackney carriage provision of one vehicle per 470 resident population. Hackney carriages in Brighton and Hove are white in colour with a green bonnet and boot. All vehicles have door signs which include the city council logo with the words "Licensed Taxi", and must display a plate on the rear of the vehicle. There are currently 126 wheelchair accessible hackney carriages.

2.4.2 The private hire fleet consists of 454 vehicles although this value fluctuates. A total of 21 vehicles within the fleet are wheelchair accessible. Private hire vehicles have door signs which say "Private Hire" or "Prior Booking Only" along with a telephone number. They must also display a green licence plate on the rear of the vehicle.

2.5 Provision of Hackney Carriage Stands

2.5.1 There are 47 taxi ranks in Brighton and Hove providing space for a total of 208 vehicles (see Appendix 1). All of the ranks are provided by Brighton and Hove City Council with the exception of the Brighton railway station rank which is provided by the Railway Authority. Plates 1 -4 picture four of the ranks.

Plate 1 East Street Rank

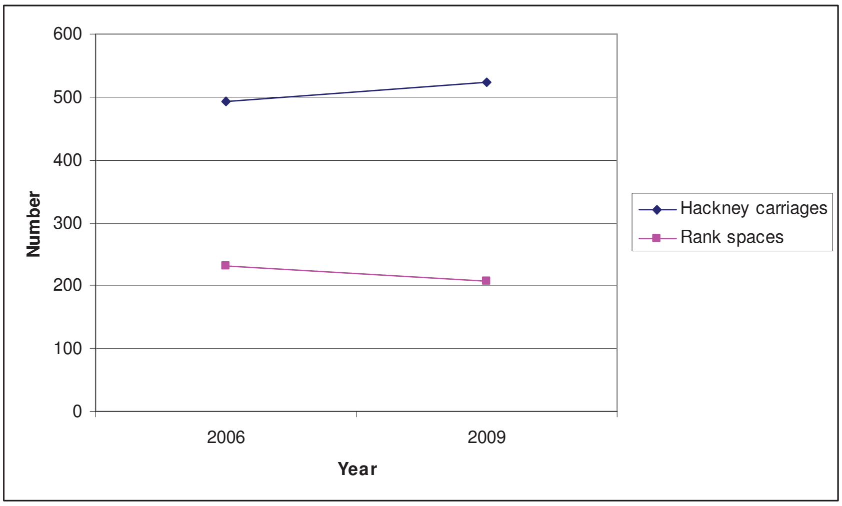
Plate 2 West Street Rank

Plate 3 Railway Station Rank

Plate 4 Queens Square Rank

2.5.2 Figure 2.1 indicates how rank provision has changed in line with hackney carriage numbers.

Figure 2.1 Rank provision v Hackney provision



2.6 Hackney Carriage Fares and Licence Premiums

2.6.1 Hackney carriage fares are regulated by the Local Authority. There are six tariffs. Tariff one consists of Monday to Saturday daytime (6am-10pm), tariff two consists of evenings (10pm-6am), Sundays between 6am and 10pm and Tariff three consists of Friday and Saturday nights between 12am and 6am. Tariffs 4, 5 and 6 are for bank and public holidays.

2.6.2 Tariff 1 is made up of two elements; an initial fee (or "drop") of £2.40 for entering the vehicle and travelling any distance up to 705 yards or 3 minutes 12 seconds of waiting time or a combination of both. For each additional 176 yards travelled or 48 seconds waiting time or a combination of both the fee is 20p. A two-mile fare for tariff 1 would therefore be £5.60. Tariff 2 has an initial fee of £3.20 for entering the vehicle and travelling any distance up to 705 yards or 3 minutes 12 seconds of waiting time or a combination of both. For each additional 176 yards travelled or 48 seconds waiting time or a combination of both the fee is 20p. A two-mile journey for tariff 2 would therefore be £6.40. Table 2.1 outlines the fare structure in more detail.

Table 2.1: Brighton & Hove Hackney Carriage Fare Tariff 2009

	Tariff A	Tariff B
Tariff 1 - Standard Charge **Applies to all hiring's except those mentioned in tariffs** Initial fee for any distance travelled up to 705 yards (645 metres) or 3 minutes 12 or a combination of distance and time. For each subsequent 176 yards (161 metres) or 48 seconds or a combination of distance and time	£2.40 20p	£3.60 30p
Tariff 2 – Late Night **Monday to Saturday between 10pm and 6am other than under tariff 3. Sundays – between 6am and 10pm.** Initial fee for any distance travelled up to 705 yards (approximately 645 metres) or 3 minutes 12 seconds or a combination of distance and time. For each subsequent 176 yards (approximately 161 metres) or 48 seconds waiting time or a combination of distance and time.	£3.20 20p	£4.80 30p
Tariff 3 – Late Night **Friday night and Saturday night only between 12 am and 6am the following day.** Initial fee for any distance travelled up to 705 yards (approximately 645 metres) or 3 minutes 12 seconds or a combination of distance and time. For each subsequent 176 yards (approximately 161 metres) or 48 seconds waiting time or a combination of distance and time.	£4.20 20p	£6.30 30p
Tariff 4 – Bank or Public Holiday **Bank or Public holiday to 6am the following day excluding the times covered by the Christmas and New Year extra charge.**		

	Tariff A	Tariff B
Initial fee for any distance travelled up to 705 yards (approximately 645 metres) or 3 minutes 12 seconds or a combination of distance and time. For each subsequent 176 yards (approximately 161 metres) or 48 seconds waiting time or a combination of distance and time	£3.40 20p	£5.10 30p
Tariff 5 – Christmas Day & Boxing Day **Between 10pm 24 December and 6am 27 December, and 5am and 10pm on 1st January.** Initial fee for any distance travelled up to 705 yards (approximately 645 metres) or 3 minutes 12 seconds or a combination of distance and time. For each subsequent 176 yards (approximately 161 metres) or 48 seconds waiting time or a combination of distance and time	£3.60 30p	£5.40 45p
Tariff 6 – New Year **Between 10pm 31 December and 5am 1st January.** Initial fee for any distance travelled up to 705 yards (approximately 645 metres) or 3 minutes 12 seconds or a combination of distance and time. For each subsequent 176 yards (approximately 161 metres) or 48 seconds waiting time or a combination of distance and time	£3.60 30p	£5.40 45p
Other Charges Fouling Charge Booking fee for telephone and pre-booked hirings The driver may charge road charges or toll's where applicable. This must be agreed with the customer before hire commences)	£50.00 40p	£50.00 60p

Source: Brighton & Hove City Council, July 2009

2.6.3 In the published monthly league table, Brighton and Hove is ranked 58 of the 377 authorities cited (Private Hire and Taxi Monthly, July 2009) which is above the level of fares typical elsewhere across the UK. Table 2.2 provides a comparison of where neighbouring authorities rank in terms of fare levels.

Table 2.2: Comparison of Neighbouring Authorities in Terms of Fares (figures are ranked out of a total of 377 Authorities with 1 being the most expensive)

Local Authority	Rank	Average two-mile journey
Adur	3	£6.60
Arun	7	£6.30
Mid Sussex	10	£6.20
Eastbourne	46	£5.70
Brighton and Hove	**58**	**£5.60**
Horsham	84	£5.50
Lewes District	103	£5.40
Worthing	172	£5.20

Source: Private Hire and Taxi Monthly, July 2009

2.6.4 Where local hackney carriage markets are subject to both price and entry regulation, it has commonly been the case that a rent accrues to the ownership of the vehicle licence. This rent or “premium” is difficult to assess accurately as the re-sale of vehicle licences is not encouraged by the Authority. The Hackney Carriage trade estimates that the resale value of a licence in Brighton and Hove is reported to be in the region of £35,000. This has fallen slightly from the estimate of £40,000 which was the level reported during the 2006 study.

2.6.5 The existence of a licence premium is evidence of “excess” profit; that is, profit that would not exist if the level of supply of hackney carriages was determined by the market rather than by the Regulator. Licence premiums do not exist in Authorities where quantity controls are absent. This does not mean that we judge hackney carriage proprietors in Brighton and Hove to be making too much money. It is not within our remit to comment on what is or is not an appropriate rate of remuneration from hackney carriage operation. The term “excess” profit simply means that earnings from plying for hire are higher at present than they would be if a free entry policy was introduced.

2.6.6 Although a premium is a clear indicator of higher than “market” profits it is not necessarily an indicator of significant unmet demand. Where a premium exists, this may be due to low cab waiting time associated with under-supply, and hence passenger delays. Alternatively, it may be due to a fares level, which is higher than the break-even level for a given supply. Finally, it may simply be a reflection of the absence of alternative means of gaining employment.

2.7 Local Transport Plan

2.7.1 The Final Brighton and Hove Local Transport Plan 2006-2011 was produced in March 2006. Local Authorities are required to produce a Local Transport Plan, which are strategies for developing local integrated transport as part of a longer term vision for the city.

2.7.2 The aim of the plan is to ease congestion, improve accessibility, air quality and safety. Taxis are a key factor in achieving these aims because they are important for accessibility particularly for people who find using public transport difficult for example people with disabilities. Taxis are also essential in maintaining a safe night time economy.

2.8 Local Area Agreement

2.8.1 Brighton & Hove have developed a new Local Area Agreement (LAA) which includes 35 local improvement targets. The specific transport targets are to reduce the number of people killed or seriously injured in road traffic accidents; reduce congestion; and improve access to services and facilities by public transport, walking and cycling. The LAA states that taxis are important in achieving the target to reduce congestion. The LAA states that taxis will be promoted as attractive, convenient and sustainable transport alternatives, particularly for journeys to work and school. This will be done through the continued delivery of the LTP and related investment programmes

3 Definition, Measurement and Removal of Significant Unmet Demand

3.1 Introduction

3.1.1 Section 3 provides a definition of significant unmet demand derived from experience of over 100 unmet demand studies since 1987. This leads to an objective measure of significant unmet demand that allows clear conclusions regarding the presence or absence of this phenomenon to be drawn. Following this, a description is provided of the SUDSIM model which is a tool developed to determine the number of additional hackney licences required to eliminate significant unmet demand, where such unmet demand is found to exist.

3.2 Overview

- Significant Unmet Demand (SUD) has two components:
- patent demand – that which is directly observable; and
- “suppressed” demand – that which is released by additional supply.

3.2.1 Patent demand is measured using rank observation data. Suppressed (or latent) demand is assessed using data from the rank observations and public attitude interview survey. Both are brought together in a single measure of unmet demand, ISUD (Index of Significant Unmet Demand).

3.3 Defining Significant Unmet Demand

3.3.1 The provision of evidence to aid licensing authorities in making decisions about hackney carriage provision requires that surveys of demand be carried out. Results based on observations of activity at hackney ranks have become the generally accepted minimum requirement.

3.3.2 The definition of significant unmet demand is informed by two Court of Appeal judgements:

- R v Great Yarmouth Borough Council ex p Sawyer (1987); and
- R v Castle Point Borough Council ex p Maude (2002).

3.3.3 The Sawyer case provides an indication of the way in which an Authority may interpret the findings of survey work. In the case of Sawyer v. Yarmouth City Council, 16 June

1987, Lord Justice Woolf ruled that an Authority is entitled to consider the situation from a temporal point of view as a whole. It does not have to condescend into a detailed consideration as to what may be the position in every limited area of the Authority in relation to the particular time of day. The area is required to give effect to the language used by the Section (Section 16) and can ask itself with regard to the area as a whole whether or not it is satisfied that there is no significant unmet demand.

3.3.4 The term "suppressed" or "latent" demand has caused some confusion over the years. It should be pointed out that following Maude v Castle Point Borough Council, heard in the Court of Appeal in October 2002, the term is now interpreted to relate purely to that demand that is measurable. Following Maude, there are two components to what Lord Justice Keene prefers to refer to as "suppressed demand":

- what can be termed inappropriately met demand. This is current observable demand that is being met by, for example, private hire cars illegally ranking up; and
- that which arises if people are forced to use some less satisfactory method of travel due to the unavailability of a hackney carriage.

3.3.5 If demand remained at a constant level throughout the day and week, the identification and treatment of significant unmet demand would be more straight-forward. If there were more cabs than required to meet the existing demand there would be queues of cabs on ranks throughout the day and night and passenger waiting times would be zero. Conversely, if too few cabs were available there would tend to be queues of passengers throughout the day. In such a case it would, in principle, be a simple matter to estimate the increase in supply of cabs necessary to just eliminate passenger queues.

3.3.6 Demand for hackney carriages varies throughout the day and on different days. The problem, introduced by variable demand, becomes clear when driver earnings are considered. If demand is much higher late at night than it is during the day, an increase in cab supply large enough to eliminate peak delays will have a disproportionate effect on the occupation rate of cabs at all other times. Earnings will fall and fares might have to be increased sharply to sustain the supply of cabs at or near its new level.

3.3.7 The main implication of the present discussion is that it is necessary, when considering whether significant unmet demand exists, to take account of the practicability of improving the standard of service through increasing supply.

3.4 Measuring Patent Significant Unmet Demand

3.4.1 Taking into account the economic, administrative and legal considerations, the identification of this important aspect of significant unmet demand should be treated as a three stage process as follows:

- identify the demand profile;
- estimate passenger and cab delays; and
- compare estimated delays to the demand profile.

3.4.2 The broad interpretation to be given to the results of this comparison are summarised in Table 3.1.

Table 3.1: Existence of Significant Unmet Demand (SUD) Determined by Comparing Demand and Delay Profiles.

	Delays during peak only	**Delays during peak and other times**
Demand is:		
Highly Peaked	No SUD	Possibly a SUD
Not Highly Peaked	Possibly a SUD	Possibly a SUD

3.4.3 It is clear from the content of the table that the simple descriptive approach fails to provide the necessary degree of clarity to support the decision making process in cases where the unambiguous conclusion is not achievable. However, it does provide the basis of a robust assessment of the principal component of significant unmet demand. The analysis is therefore extended to provide a more formal numerical measure of significant unmet demand. This is based on the principles contained in the descriptive approach but provides greater clarity. A description follows.

3.4.4 The measure feeds directly off the results of observations of activity at the ranks and the results of a passenger survey. In particular it takes account of:

- case law that suggests an authority should take a broad view of the market;
- the effect of different levels of supply during different periods at the rank on service quality;
- the need for consistent treatment of different authorities, and the same authority over time.

3.4.5 The Index of Significant Unmet Demand (ISUD) was developed in the early 1990's and is based on the following formula. The SF element was introduced in 2003 and the LDF element was introduced in 2006 to reflect the increased emphasis on latent demand in DfT Guidance

ISUD = APD x PF x GID x SSP x SF x LDF

Where:

APD = Average Passenger Delay calculated across the entire week.

PF = Peaking Factor. If passenger demand is highly peaked at night the factor takes the value of 0.5. If it is not peaked the value is 1. Following case law this provides dispensation for the effects of peaked demand on the ability of the Trade to meet that demand. To identify high peaking we are generally looking for demand at night (at weekends) to be substantially higher than demand at other times.

GID = General Incidence of Delay. This is measured as the proportion of passengers who travel in hours where the delay exceeds one minute.

SSP = Steady State Performance. The corollary of providing dispensation during the peaks in demand is that it is necessary to focus on performance during "normal" hours. This is measured by the proportion of hours during weekday daytimes when the market exhibits excess demand conditions (i.e. passenger queues form at ranks).

SF = Seasonality factor. Due to the nature of these surveys it is not possible to collect information throughout an entire year to assess the effects of seasonality. Experience has suggested that hackney demand does exhibit a degree of seasonality and this is allowed for by the inclusion of a seasonality factor. The factor is set at a level to ensure that a marginal decision either way obtained in an "untypical" month will be reversed. This factor takes a value of 1 for surveys conducted in September to November and March to June, i.e. "typical" months. It takes a value of 1.2 for surveys conducted in January and February and the longer school holidays, where low demand the absence of contract work will bias the results in favour of the hackney trade, and a value of 0.8 for surveys conducted in December during the pre Christmas rush of activity. Generally, surveys in these atypical months, and in school holidays, should be avoided.

LDF = Latent Demand Factor. This is derived from the public attitude survey results an provides a measure of the proportion of the public who have given up trying to obtain a hackney carriage at either a rank or by flagdown during the previous three months. It is measured as 1+ proportion giving up waiting. The inclusion of this factor is a tactical response to the latest DfT guidance.

3.4.6 The product of these six measures provides an index value. The index is exponential and values above the 80 mark have been found to indicate significant unmet demand. This benchmark was defined by applying the factor to the 25 or so studies that had been conducted at the point it was developed. These earlier studies had used the same principles but in a less structured manner. The highest ISUD value for a study where a conclusion of no significant unmet demand had been found was 72. The threshold was therefore set at 80. The ISUD factor has been applied to over 80 studies by Halcrow and has been adopted by others working in the field. It has proved to be a robust, intuitively appealing and reliable measure.

3.4.7 Suppressed/latent demand is explicitly included in the above analysis by the inclusion of the LDF factor and because any known illegal plying for hire by the private hire trade is included in the rank observation data. This covers both elements of suppressed/latent demand resulting from the Maude case referred to above and is intended to provide a 'belt and braces' approach. A consideration of latent demand is also included where there is a need to increase the number of hackney carriage licences following a finding of significant unmet demand. This is discussed in the next section.

3.5 Determining the Number of New Licences Required to Eliminate Significant Unmet Demand

3.5.1 To provide advice on the increase in licences required to eliminate significant unmet demand, Halcrow has developed a predictive model. SUDSIM is a product of 20 years experience of analysing hackney carriage demand. It is a mathematical model, which predicts the number of additional licences required to eliminate significant unmet demand as a function of key market characteristics.

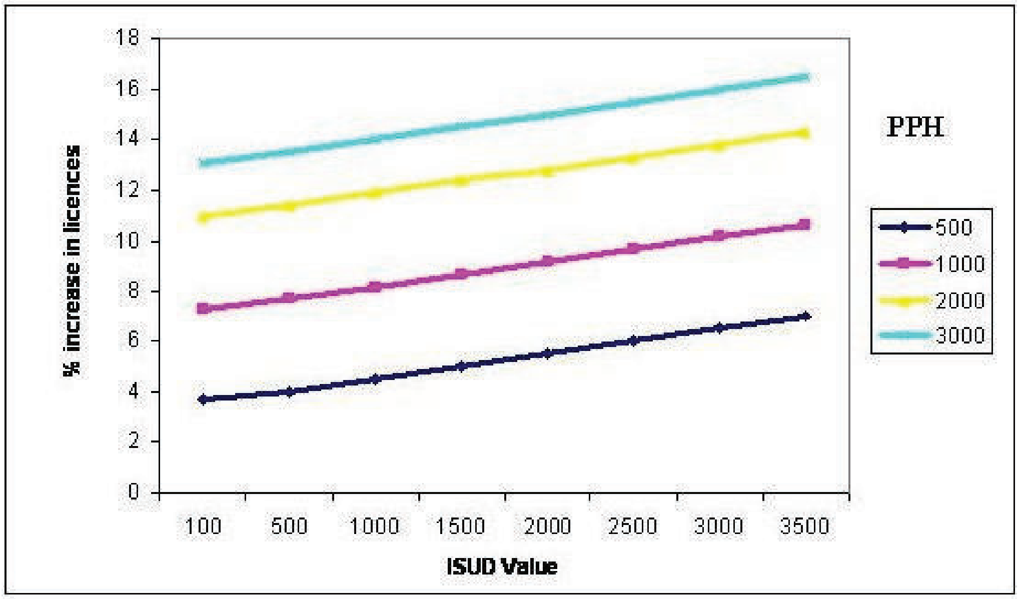
3.5.2 SUDSIM represents a synthesis of a queue simulation work that was previously used (1989 to 2002) to predict the alleviation of significant unmet demand and the ISUD factor described above (hence the term SUDSIM). The benefit of this approach is that it provides a direct relationship between the scale of the ISUD factor and the number of new hackney licences required.

3.5.3 SUDSIM was developed taking the recommendations from 14 studies that resulted in an increase in licences, and using these data to calibrate a simple econometric model. The model provides a relationship between the recommended increase in licences and three key market indicators:

- the population of the licensing Authority;
- the number of hackneys already licensed by the licensing Authority; and
- the size of the ISUD factor.

3.5.4 The main implications of the model are illustrated in Figure 3.1 below. The figure shows that the percentage increase in a hackney fleet required to eliminate significant unmet demand is positively related to the population per hackney (PPH) and the value of the ISUD factor over the expected range of these two variables.

Figure 3.1: Forecast Increase in Hackney Fleet Size as a Function of Population Per Hackney (PPH) and the ISUD Value



3.5.5 Where significant unmet demand is identified, the recommended increase in licences is therefore determined by the following formula:

New Licences = SUDSIM x Latent Demand Factor

Where:

- Latent Demand Factor = (1 + proportion giving up waiting for a hackney at either a rank or via flagdown).

3.6 Note on Scope of Assessing Significant Unmet Demand

3.6.1 It is useful to note the extent to which a licensing authority is required to consider peripheral matters when establishing the existence or otherwise of significant unmet demand. This issue is informed by R v Brighton Borough Council, exp p Bunch 1989[1]. This case set the precedent that it is only those services that are exclusive to hackney carriages that need concern a licensing authority when considering significant unmet demand. Telephone booked trips, trips booked in advance or indeed the provision of bus type services are not exclusive to hackney carriages and have therefore been excluded from consideration.

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[1] See Button JH 'Taxis – Licensing Law and Practice' 2nd edition Tottel 2006 P226-7

4 Evidence of Patent Unmet Demand – Rank Observation Results

4.1 Introduction

4.1.1 This section of the report highlights the results of the rank observation survey. The rank observation programme covered a period of 343 hours. During the hours observed some 52,542 passengers and 38,928 cab departures were recorded. The rank observations were carried out from Tuesday 21st April to Sunday 7th June. A summary of the rank observation programme is provided in Appendix 2.

4.1.2 The results presented in this Section summarise the information and draw out its implications. This is achieved by using five indicators:

- **The Balance of Supply and Demand** – this indicates the proportion of the time that the market exhibits excess demand, equilibrium and excess supply;
- **Average Delays and Total Demand** – this indicates the overall level of passengers and cab delays and provides estimates of total demand;
- **The Demand/Delay Profile** – this provides the key information required to determine the existence or otherwise of significant unmet demand;
- **The Proportions of Passengers Experiencing Given Levels of Delay** – this provides a guide to the generality of passenger delay; and
- **The Effective Supply of Vehicles** – this indicates the proportion of the fleet that was off the road during the survey.

4.2 The Balance of Supply and Demand

4.2.1 The results of the analysis are presented in Table 4.1 below. The predominant market state is one of equilibrium. Excess supply (queues of cabs) was experienced during 25% of the hours observed while excess demand (queues of passengers) was experienced in 12% of hours. Conditions were least favourable to customers on weekend night periods. When compared with the findings from previous studies it is clear that conditions are becoming more favourable to passengers. Excess demand has fallen from 19% of hours in 2003 to 12% of hours in 2009.

Table 4.1: The Balance of Supply and Demand in the Brighton and Hove Rank-Based Hackney Carriage Market (Percentages – Rows Sum to 100)

Period		Excess Demand	Equilibrium	Excess Supply
Weekday	Day	7	66	28
	Night	8	52	41
Weekend	Day	10	78	12
	Night	25	45	30
Sunday	Day	11	77	11
Total 2009		**12**	**63**	**25**
Total 2006		**16**	**73**	**11**
Total 2003		**19**	**57**	**24**

NB – Excess Demand = Maximum Passenger Queue ≥3. Excess Supply = Minimum Cab Queue ≥3 – values derived over 12 time periods within an hour.

4.3 Average Delays and Total Demand

4.3.1 The following estimates of average delays and throughput were produced for each of the main ranks in Brighton & Hove (Table 4.2).

4.3.2 The survey suggests some 52,542 passenger departures occur per week from ranks in Brighton & Hove involving some 38,928 cab departures.

4.3.3 The hackney carriage trade is somewhat concentrated at Brighton Rail Station, accounting for 32% of the total, whilst the rank on East Street accounts for 21% of the total passengers. On average, passengers wait 0.72 minutes for a cab. Passengers experience the greatest delay at the Elm Grove Rank, where an average delay of over 7.14 minutes is experienced.

4.3.4 The data show that over time passengers are waiting for less time for a hackney with the gains in identified in the previous study being maintained. This is at the expense of a small rise in the amount of time hackneys are queuing at the ranks.

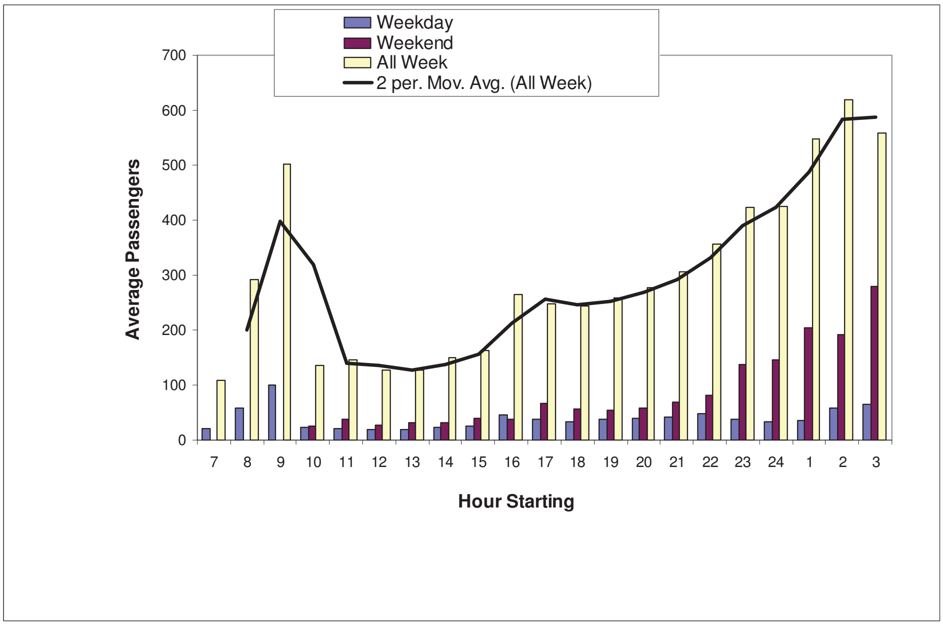
Table 4.2: Average Delays and Total Demand (Delays in Minutes)

Rank	Passenger Departures	Cab Departures	Average Passenger Delay	Average Cab Delay
Brighton Railway	16,634	12,365	0.39	7.41
East Street	11,225	6,582	0.00	9.52
St Peter's Place	2,518	2,124	0.41	8.51
Queen's Square	3,418	2,279	0.99	15.31
Norton Road	1,494	2,419	0.02	11.09
Hove Railway	2,527	2,341	0.11	7.79
Brunswick Place	1,216	1,402	0.71	9.25
Church Road	488	580	0.33	7.49
West Street	6,628	3,330	3.68	7.61
Goldstone Villas	314	671	0.05	9.09
Paston Place	1,268	2,211	0.05	12.10
Elm Grove	39	272	7.14	12.81
Old Ship Hotel	4,773	2,352	0.18	6.65
Total 2009	**52,542**	**38,928**	**0.72**	**8.91**
Total 2006	**46,308**	**32,332**	**0.73**	**7.64**
Total 2003	**37,500**	**28,850**	**1.11**	**8.31**

4.4 The Delay/Demand Profile

4.4.1 Figure 4.1 provides a graphical illustration of passenger demand for the Monday to Saturday period between the hours of 09:00 and 03:00. There is a peak in demand on the weekend night period between the hours of 2400 and beyond 0300. There is also a peak in demand on weekdays between 0800 and 1000.

Figure 4.1 **Passenger Demand by Time of Day in 2009 (Monday to Saturday)**



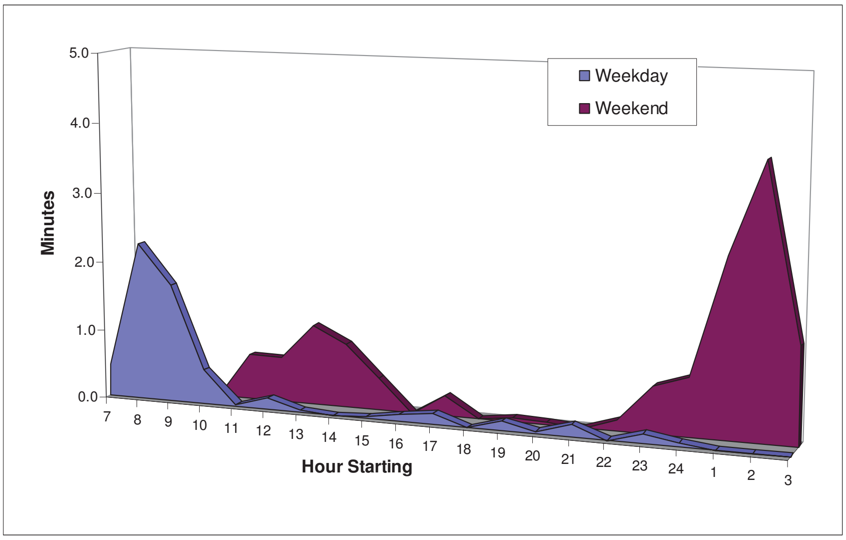
4.4.2 The level of peaking late at night and in the AM peak period relative other times is high; we therefore conclude that this is a 'highly peaked' demand profile. This has implications for the interpretation of the results (see Section 4.6 below).

4.4.3 Recent best practice guidance, issued by the DfT, states that delays associated with peaks in demand (such as morning and evening rush hours, or pub closing times) should be treated as 'significant' as they are often the most popular times for consumers to use taxis. However, in R v Great Yarmouth Borough Council ex p Sawyer (1987) Lord Justice Woolf ruled that an Authority is entitled to consider the situation from a temporal point of view as a whole. It does not have to condescend into a detailed consideration as to what may be the position in every limited area of the Authority in relation to the particular time of day.

4.4.4 It should also be noted that these 'peaks' may not be the direct result of the authority's limitation policy as they can also occur in de-restricted authorities. For example, we observed high passenger delays at ranks during weekend late night peak periods in Leicester in 2000 despite the fact that there had been no numerical limit in place in the hackney carriage market for over 10 years. Similar results were obtained in Bristol, an authority that had been de-restricted for 4 years at the time of the study. Halcrow believes that the DfT is mistaken in its assertion that passenger delay late at night associated with short term peaks in demand is evidence of the detrimental impact of quantity control regulations. Rather, it is an inevitable consequence of the concentration of demand i.e. it is caused by the same fundamental principles that cause queues in banks, post offices and supermarkets.

4.4.5 Figure 4.2 provides an illustration of passenger delay by the time of day for the weekday and weekend periods. It indicates incidences of passenger delay peak on weekdays between 0700 and 0900 and on weekend evenings between 0100 and 0300. The level of passenger delay is greatest at 0200 on weekends where passenger delay can peak to 3.85 minutes.

Figure 4.2 **Passenger Delay by Time of Day in 2009 (Monday to Saturday)**



4.5 The generality of passenger delay

4.5.1 The rank observation data can be used to provide a simple assessment of the likelihood of passengers encountering delay at ranks. The results are presented below in Table 4.3.

Table 4.3 Percentage Passenger Delay

Delay	Passengers Delay
Delay > 0	10.84%
Delay > 1 minute	**5.67%**
Delay > 5 Minutes	1.19%

4.5.2 The results indicate that almost 11% of the passengers observed using a rank travelled in an hour where some delay occurred. The proportion likely to experience more than a minute of delay is estimated at 5.67%. It is this proportion that is used within the ISUD as the 'Generality of Passenger Delay.'

4.6 The Effective Supply of Vehicles

4.6.1 Observers were required to record the hackney carriage license plate number of vehicles departing from ranks. In this way we are able to ascertain the proportion of the fleet that was operating during the survey.

4.6.2 During the daytime period (0700 to 1800) some 440 (84%) of the hackney fleet were observed at least once during the period of the study. During the evening/night-time period (1800 to 0700) some 470 (90%) of the hackney fleet were also observed at least once during the period of the study.

5 Evidence of Suppressed Demand - Public Attitude Pedestrian Survey Results

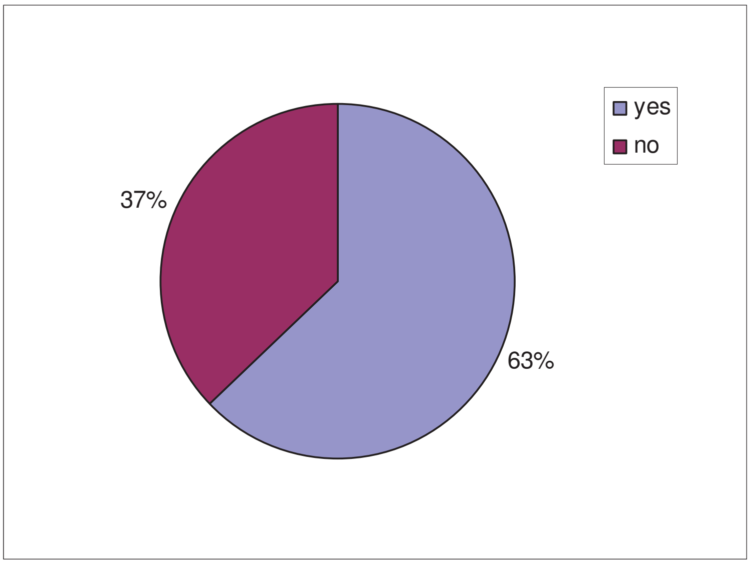
5.1 Introduction

5.1.1 Some 493 on-street public interview surveys were carried out in June 2009. A quota was followed so that the survey reflected the age and gender characteristics of the local community. This, in turn, ensured that broadly representative results were obtained. For the purpose of the survey the generic word 'taxi' was used which incorporated both hackney carriages and private hire vehicles.

5.1.2 A full breakdown and analysis of the results and the survey form is provided in Appendix 3.

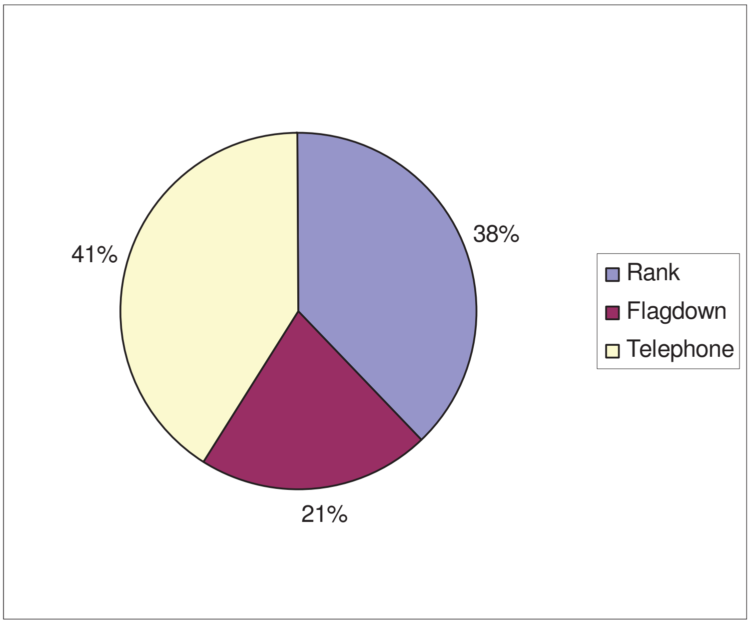
5.1.3 The survey found that 63% of respondents had used a taxi in Brighton & Hove within the last three months. The results are displayed in Figure 5.1 below.

Figure 5.1: Made a trip by taxi in the last 3 months?



5.1.4 Tripmakers were asked how they obtained their taxi. Some 38% of tripmakers stated that they hired their taxi at a rank. Some 41% of hirings were achieved by telephone with 21% of tripmakers obtaining a taxi by on-street flagdowns. Figure 5.2 reveals the pattern of taxi hire.

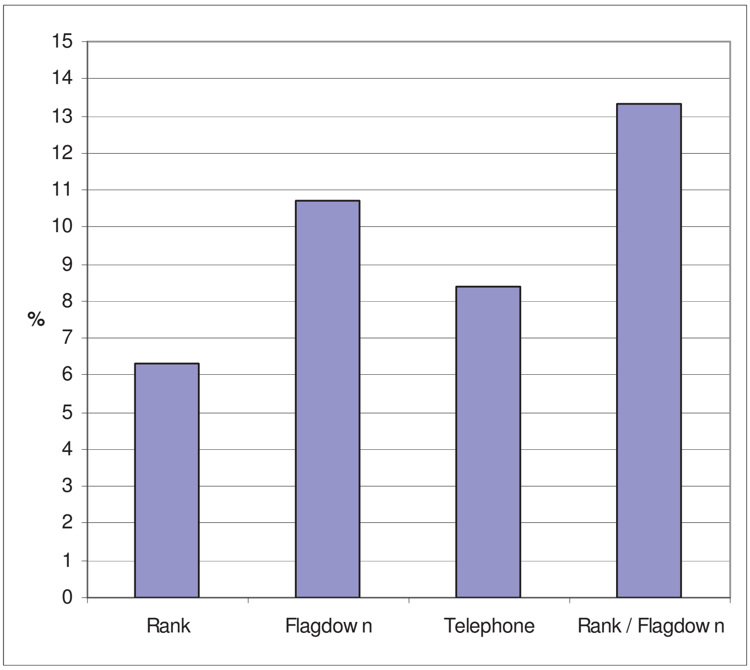
Figure 5.2: Method of Hire for Last Trip



5.1.5 Respondents were asked if they were satisfied with the time taken and the promptness of the taxis arrival. The majority of people were satisfied with the delay on their last taxi journey (92%). The average waiting time was six minutes; however some respondents stated they waited as long as 45 minutes for a taxi.

5.1.6 To provide evidence relating to suppressed/patent demand respondents were asked to identify whether or not they had given up waiting for a taxi at a rank, on the street, or by telephone in Brighton & Hove in the last three months. The results are documented in Figure 5.3.

Figure 5.3: Latent demand by method of hire – % who had given up trying to make a hiring in the last 3 months?



5.1.7 Figure 5.3 highlights that over 6% had given up waiting for a taxi at a rank; almost 11% had given up via flagdown and over 8% via telephone. Some 13.3% had given up waiting for a taxi at a rank or by flagdown in the last three months. This figure is figure used to represent the level of latent (suppressed) demand in Brighton and Hove.

5.1.8 Those who had given up waiting for a vehicle in Brighton and Hove were asked for this location. The locations stated most frequently were:

- Brighton Centre;
- Lewes Road; and
- London Road

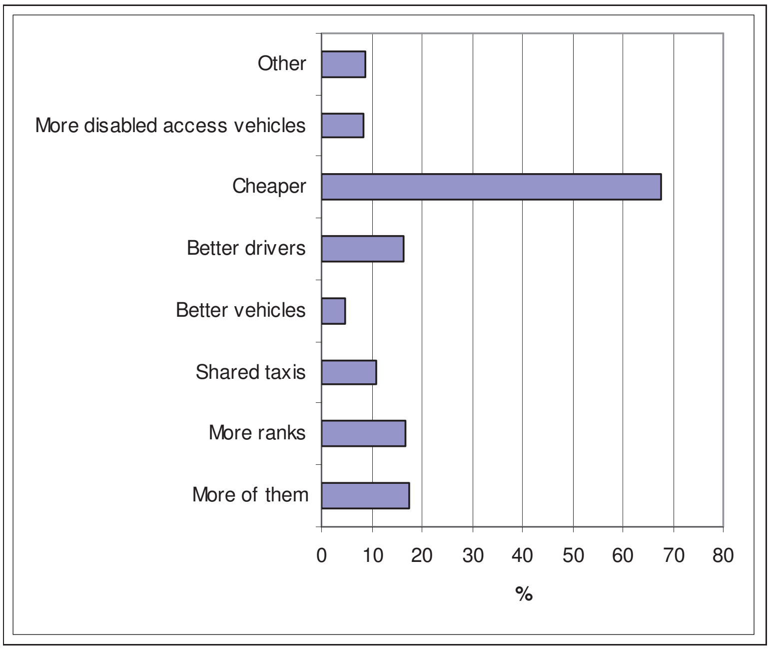
5.1.9 Respondents were asked what type of vehicle they required the last time they gave up waiting. Some 84% of those who answered stated that it did not matter; any vehicle would have been acceptable. Some 7% stated that they required a vehicle that could fit more than four passengers, and 6% stated that they required a wheelchair accessible vehicle.

5.2 Service Improvements

5.2.1 Respondents were asked if they thought the taxi services in the Brighton and Hove area could be improved. The responses indicate that the majority of respondents (55%) thought that taxi services in Brighton and Hove could be improved.

5.2.2 Those who considered that taxi services needed improvement were asked how they could be improved. The results are documented in Figure 5.4.

Figure 5.4 How should taxi services be improved?

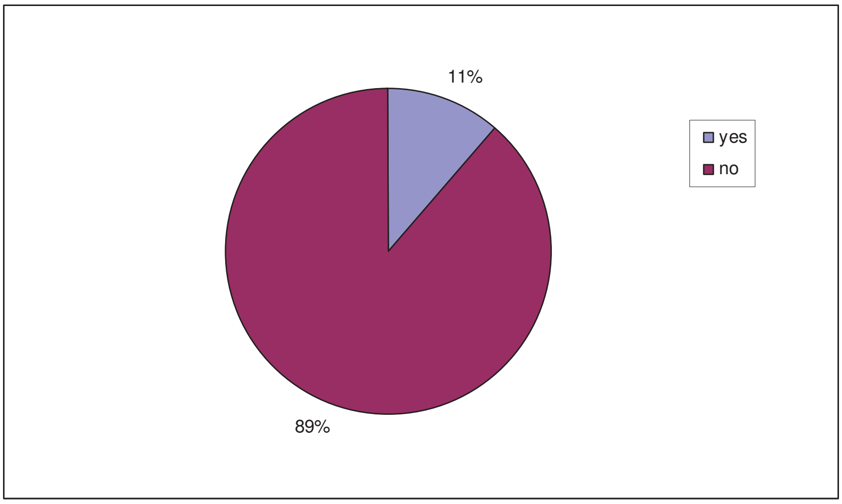


5.2.3 Of those stating that the service could be improved some that 68% of respondents stated that taxis in Brighton and Hove could be improved if they were made cheaper. Some 17% of respondents would like to see more ranks and 17% would like to see more vehicles. For those that stated other, the most common improvement suggested was to provide more vehicles that can carry four or more passengers.

5.3 Public Awareness

5.3.1 Respondents were asked whether they were aware that Brighton and Hove Council limit the number of Hackney Carriages at 523. Only 11% of those who answered were aware of this limit. There results are shown in Figure 5.5.

Figure 5.5 Where you aware of the numerical limit on taxi studies?

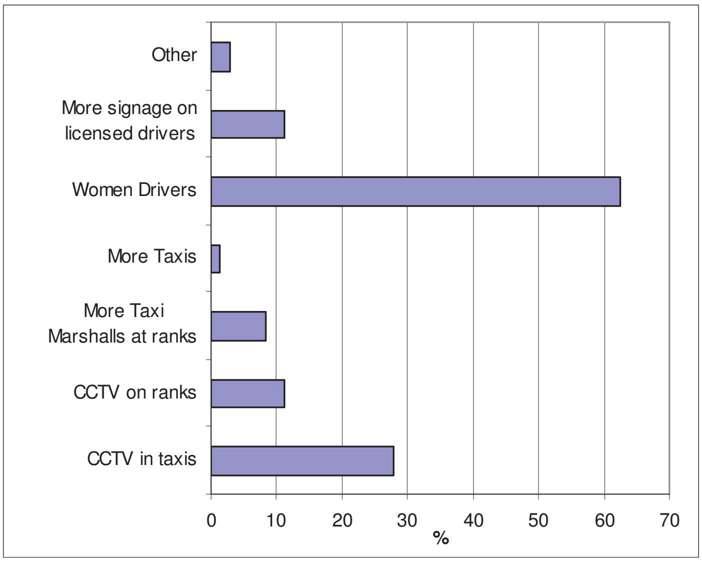


5.4 Safety & Security

5.4.1 Respondents were asked whether they felt safe when using taxis in Brighton and Hove. The majority of respondents felt safe using taxis during the day (98%), however some 15% stated that they felt unsafe using taxis at night in Brighton and Hove.

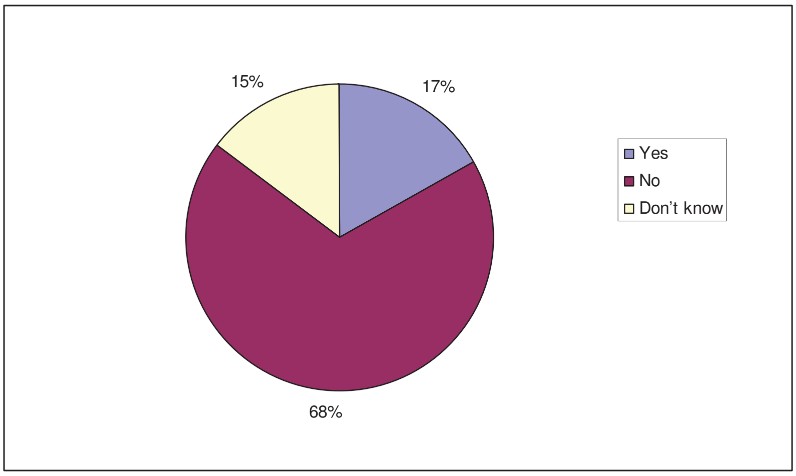
5.4.2 Respondents who did not feel safe during the day or at night were asked what needed to be done to improve safety and security when using taxis in Brighton and Hove. Some 63% of respondents stated that they would feel safer with women drivers whilst 28% of respondents stated that CCTV in taxis would improve safety when using taxis in Brighton and Hove. The results are shown in Figure 5.6.

Figure 5.6 Improvements to safety and security



5.4.3 Respondents were asked whether they would be willing for a small surcharge to be added to their fares in order to fund taxi marshals. Some 68% of respondents said that they would not be willing to pay a surcharge for this reason, while 17% of respondents replied that they wouldn't mind. The remaining 15% stated that they were unsure.

Figure 5.6 Pay a surcharge to fund marshals



5.5 Pedicabs

5.5.1 The public were asked whether they would use rickshaws (pedicabs) if they were present in Brighton and Hove. The results are detailed in Table 16. Some 44% of respondents stated that they would use pedicabs with 35% stating they would not. Those who stated that they would not use pedicabs were asked why. The most common answers were that they were too slow, too expensive and too dangerous.

5.5.2 Those who stated they would use pedicabs were asked how often they think they would use them. Almost 50% of respondents stated that they would only use pedicabs once or twice a year.

5.5.3 Those who stated that they would not use pedicabs were asked why. The most common answers were that they were too slow, too expensive and too dangerous. Others said that they do not use taxis often anyway, or that they just wouldn't want to use pedicabs.

Summary

Key results from the Public Attitude Survey can be summarised as:

- Some 63% of respondents had used a taxi in Brighton & Hove within the last three months;
- High levels of satisfaction with delay on last trip;
- Some 13% of respondents had given up trying to obtain a vehicle by rank or flagdown;
- Some 55% of respondents feel that taxi services in Brighton & Hove could be improved (need to be cheaper);
- Majority of respondents felt safe using taxis during the day and night;
- Some 68% of respondents said that they would not be willing to pay a surcharge to fund marshals; and
- Some 44% of respondents stated that they would use pedicabs.

6 Deriving the Significant Unmet Demand Index value

6.1 *Introduction*

6.1.1 The data above can be summarised using Halcrow's ISUD factor described in Section 3. The component parts of the index, their source and their values are given below:

• Average Passenger Delay (Table 4.2)	0.72
• Peak Factor (Figure 4.1)	0.5
• General Incidence of Delay (Table 4.3)	5.67
• Steady State Performance (Table 4.1)	7
• Seasonality Factor (paragraph 3.4.5)	1
• Latent Demand Factor (paragraph 5.1.7)	1.133

ISUD (0.72*0.5*5.67*7*1*1.133) **16.2**

6.1.2 The cut off level for significant unmet demand is 80. It is clear that Brighton & Hove is well below this cut off point, indicating that there is NO significant unmet demand. This conclusion covers both patent and latent/suppressed demand.

6.2 *Brighton & Hove Compared to Other Districts*

6.2.1 Comparable statistics are available from 48 local authorities and these are listed in Table 4.4. The table highlights a number of key results including:

- population per hackney carriage at the time of the study (column one);
- the proportion of rank users travelling in hours in which delays of greater than zero, greater than one minute and greater than five minutes occurred (columns two to four);

- average passenger and cab delay calculated from the rank observations (columns five to six);
- the proportion of Monday to Thursday daytime hours in which excess demand was observed (column seven);
- the judgement on whether rank demand is highly peaked (column eleven); and
- a numerical indicator of significant unmet demand.

6.3 Results of the Comparison with Previous Studies

6.3.1 The following points (obtained from the rank observations) may be made about the results in Brighton & Hove compared to other areas studied:

- population per hackney carriage is lower than the average overall value i.e. Brighton & Hove has a higher than average provision;
- the proportion of passengers, who travel in hours where some delay occurs, is 10.84%, which is lower than the average (27%) for the districts analysed. The proportion of passengers travelling in hours where the delay equals or exceeds one minute (5.67%) is also below the average of 14% for all the authorities;
- overall average passenger delay at 0.72 minutes is lower than the average value;
- overall average cab delay is lower than the average for all the districts shown;
- the proportion of weekday daytime hours is which excess demand conditions are observed is 7% which is slightly less than the average of 8% for all authorities shown; and
- demand in Brighton & Hove is considered to exhibit a high degree of peaking late at night compared to the rest of the day..

Table 4.4 A Comparison of Brighton & Hove with Other Authorities Studied (values in italics make up ISUD)									
District and Year of Survey	**Population per Hackney**	**Proportion Waiting at Ranks**	***Proportion Waiting >= 1 Min***	**Proportion Waiting >= 5 Mins**	***Average Passenger Delay***	**Average Cab Delay**	**% Excess Demand**	**Demand Peaked, Yes=0.5 No=1**	**ISUD Indicator Value**
Brighton & Hove 09	**474**	**10.84**	**5.67**	**1.19**	**0.72**	**8.91**	**7**	**0.5**	**16.2**
Brighton & Hove 06	508	52	23	6	0.73	7.64	6	0.5	50
Brighton & Hove 03	540	60	35	12	1.11	8.31	5	0.5	97
Hull 09	1,465	12.15	*8.54*	0.99	*1.72*	9.34	2	0.5	18
Rochdale 09	1,937	3.1	*1.18*	0	*0.14*	12.92	5	1	1
North Tyneside 2008	971	15.68	1.18	0.03	0.38	10.72	8	0.5	2
Rotherham 2008	5,192	0.09	0.09	0	0.01	27.29	0	1	0
Preston 08	677	11.85	5.28	0	0.61	11.13	7	1.0	21
Scarborough 08	1,111	11.75	5	1.06	0.49	7.74	7	0.5	0
Barrow 2008	474	13.97	12.52	0	0.5	6.85	0	0.5	0
York 08	1,146	31	11.5	6.74	3.21	5.42	31	0.5	645
Stirling 08	1,265	25	18	0.3	0.7	10.94	2	0.5	38
Torridge 08	1,202	7	0.94	0	0.12	14.99	0	1	0
Richmondshire 08	723	5	1	0.07	0.22	34.32	1	0.5	0.4
Exeter 2007/08	1,883	7	4	0.6	0.33	15.27	6	1	9
Manchester 07	394	21	6	2.28	1.59	10.24	14	1	174
Bradford 07	1,630	18	2	0.03	0.23	17.64	5	1	2
Barnsley 07	3,254	5	8	0.22	1.32	11.93	5	1	58
Broadstairs 06	1,000	13	13	10	3.25	23.97	4	1	177
Margate 06	1,622	4	1	0	0.05	33.14	0	1	0
Ramsgate 06	1,026	2	2	2	0.49	19.57	13	1	13
Plymouth 06	669	7	3	1	0.52	11.58	1	1	2
Thurrock 06	1,590	32	13	1	0.22	15.27	0	1	0
Trafford 06	2,039	55	38	6	1.09	13.15	5	1	249
Hull 06	1,433	45	23	4	0.68	12.52	5	0.5	38
Leicester 05	880	20.8	11	1.15	0.35	19.36	3	1	12
Bournemouth 05	656	20	11	2	0.37	12.25	1	0.5	2
Bradford 03	2,171	19	6	0.77	0.25	14.89	6	1.0	9
Oldham 03	2,558	30	12	0.79	0.48	14.8	7	1.0	40
Blackpool 03	556	21	4	0.3	0.13	12.4	6	1.0	3
Thurrock 03	1,607	43	14	1.01	0.50	12.5	2	1.0	14
Wolverhampton 03	3,113	50	31	7.39	1.49	11.18	14	1.0	647
Bournemouth 02	702	25	15	2	0.67	9.97	1	0.5	5
Exeter 02	2,353	47	18	3	0.71	10.12	20	1.0	256
Wigan 02	2,279	28	10	0	1.17	11.98	6	1.0	70
Cardiff 01	656	51	29	6	0.83	8.77	14	0.5	168
Edinburgh 01	373	47	29	9	1.27	8.77	13	1.0	479
Torridge 01	1,298	25	21	0	0.51	9.32	8	0.5	43
Worcester 01*	941	40	4	1	0.46	12.3	8	0.5	7
Ellesmere Port 01	2,527	80	48	17	2.49	4.23	49	0.5	2,928
Southend 00	895	46	29	8	1.92	8.08	4	1.0	223
South Ribble 00 *	485	12	0.25	0.25	0.07	11.27	0	1.0	0
Leicester 00 *	956	10	7	3	1.17	20.19	1	1.0	8
Leeds 00	1,693	83	61	33	5.03	7.92	36	1.0	11,046
Sefton 00	1,069	18	8	0.6	0.28	12.95	6	1.0	13
Castle Point 00	2,286	28	12	3	0.74	8.6	2	0.5	9
Bedford 00	2,931	25	15	10	0.86	6.86	4	1.0	52
Thurrock 00	1,406	28	14	2	0.63	10.66	6	1.0	53
Manchester 00	569	59	40	13	1.78	6.79	23	1.0	1,638
AVERAGE	**1,412**	**27**	**14**	**4**	**0.91**	**13**	**8**		

7 Consultation

7.1 Introduction

7.1.1 Guidelines issued by the Department for Transport state that consultation should be undertaken with the following;

- all those working in the market;
- consumer and passenger (including disabled) groups;
- groups which represent those passengers with special needs;
- the Police;
- local interest groups such as hospitals or visitor attractions; and
- a wide range of transport stakeholders such as rail/bus/coach operators and transport managers.

7.2 Direct Consultation

7.2.1 A series of focus groups were held in July 2009 with a range of stakeholders to glean their views regarding the taxi and private hire service across Brighton & Hove. Separate meetings were organised with the following:

- Hackney Carriage trade representatives;
- Private hire trade representatives;
- Taxi operators;
- Disability representatives and Social Services; and
- Police and Community Safety Partnership.

7.2.2 The comments received are detailed below.

Hackney Carriage Trade

7.2.3 The hackney carriage representatives felt that Brighton and Hove is well supplied with taxis, even at night and the current limit seems to be working well. The Hackney Carriage trade feel that there are queues of hackneys late at night and there are no passenger queues. They feel that the Licensing Act has flattened the peak.

7.2.4 It is felt that there are enough wheelchair accessible vehicles in Brighton & Hove however availability can be limited at school contract time as this restricts the number of wheelchair accessible vehicles for general hire.

7.2.5 According to the Hackney trade, vehicles tend to concentrate on central ranks. The Hackney Carriage trade stated that they are not consulted when ranks are taken away. It is accepted that there are some locations where ranks are not being used but some are being removed for other reasons and not being replaced. Ranks on New Road, North Street and St James Street have been taken away and not replaced and the rank by the Old Ship Hotel and the rank on the seafront are also under threat of being removed. The rank on New Road and the rank by the Old Ship Hotel were cited as being particularly busy and the hackney trade are strongly against the removal of the rank on the seafront.

7.2.6 The trade stated that there was a need for new ranks by the Thistle Hotel and the Queen's Hotel, and another rank near the rail station, because there is no rank between the Station and Queen's Square. It is felt that lengthening ranks would not be feasible, as it would cause accidents due to the road layout. There are some locations where ranks are not regularly used because of their location, for example the back of the station is not used often because passengers tend to come from the South.

7.2.7 It was also noted that one of the taxi firms has just signed a new contract with the station, paying £410 to use the station rank.

7.2.8 At night drivers generally avoid West Street as there is often trouble with passengers under the influence of alcohol queue jumping, spilling food and drink in taxis, anti-social behaviour and fare-dodging. Crimes on taxi drivers often go unreported due to the time taken to report incidents meaning the loss of fares.

7.2.9 The Hackney trade feel that having marshals on ranks is a good idea. There was a pilot funded by the Sudanese Taxi Forum and the police. This found that passengers do listen to the marshals. Ranks that have been cited as needing marshals on a Friday and Saturday night are West Street, East Street, Queen's Square, and at the Station and Old Ship Hotel. It is felt that marshals are needed for driver safety as marshals would help prevent driver abuse and queue jumping and driver 'cherry picking' would stop. It was suggested that Community Support Officers could be used as marshals.

7.2.10 It is felt that the image of Hackneys has improved over the years as the standards have improved. However, it is felt that the age limits on both Hackney Carriages and Private Hire vehicles should be reviewed. It was suggested that the age limit should be changed to seven years for Hackney Carriages and 10 years for Private Hire vehicles and wheelchair accessible Hackney vehicles. It is felt that there should also be exceptions for purpose built cabs.

7.2.11 With regards to training, the representative felt that retrospective training is unnecessary because experience is more important; however it should be a requirement for new drivers. They felt that first aid training should be offered, and a customer services course which was funded in the past for drivers should be reinstated.

7.2.12 The level of Hackney Carriage fares are regarded as about right. The trade approach the council annually to set the process for an increase in fares. It was highlighted that the normal three tariffs can confuse passengers and it could work better if there were only two tariffs. The Hackney representative stated that the premium is currently around £35,000 depending on the vehicle.

Private Hire Trade

7.2.13 In contrast to the views of the Hackney trade representatives the private hire representatives felt that the limit on plates should be removed. Instead, the private hire trade feel that there should be quality restrictions rather than quantity restrictions. The representatives do feel that the waiting list criteria in Brighton & Hove are acceptable.

7.2.14 The representatives stated that the trade wanted to add a taxi marshal cost to fares, but the councillors rejected the idea. They cited ranks on West Street, East Street and Ship Street as being ones that would require marshals, and especially during Friday and Saturday nights, from 10pm to 5am the next morning. Perhaps there could be 2 marshals on each of the cited ranks, using a licensed security firm. Adding a surcharge onto customers' fares should help fund the marshals and it would only cost 1-2p per mile they travel.

7.2.15 It is felt that there are not enough Hackney Carriages; however demand is currently being met due to the recent economic climate. The daytime trade has not suffered, but the night time trade has and vehicles now double shift regularly. However, it is also felt that the taxi trade in Brighton and Hove will not suffer from the recession as much as elsewhere due to tourism during the summer months and the large student population.

7.2.16 It is felt that there are not enough wheelchair accessible vehicles. The availability problems are made worse as some drivers have been known to refuse to take wheelchair passengers, especially at the station.

7.2.17 The private hire trade felt that vehicle standards are acceptable however it would be good to improve them, by having two tests per year. They feel that the type of vehicle that is allowed is acceptable.

7.2.18 The representatives felt that there is a big problem with driver quality and standards have dropped since the last study in 2006. It was also felt that overcharging fares has increased in both Hackney Carriage and Private Hire drivers, while customer service and the knowledge of the area has worsened. It was felt that a BTEC should be aimed at new drivers only. It was felt that the knowledge test should be harder for new drivers as they can rely too much on their Satellite Navigation system. It was felt that if there is a complaint made against a driver, they should be subjected to additional tests.

7.2.19 The private hire trade feel that customers do not know the procedure if they want to complain about the service as they will generally ring the operator and not the council. There should be more information available on the complaint procedure. It was highlighted that if complaints are made, the council do investigate.

7.2.20 The private hire trade feel that ranks that are regularly used need to be longer, in contrast to the feelings of the Hackney trade. They feel that the Licensing Team at the council are good, but the Highways Team often take away ranks or replace ranks without consultation with the trade. They feel there should be a joint rank review with the Licensing team and the Highways team. The private hire trade feel that a rank at the Marina could be beneficial, however the land owner would object to it.

7.2.21 The representatives stated that the trade would not take up any taxibus options as the bus services in Brighton and Hove are good.

Taxi Operators

7.2.22 Taxi operators do not want the limit on plates to be removed. It was stated the five plates that were issued this year had been taken up and they all joined operators. They feel that the managed growth policy should be paused during the recession. They also feel there is a lack of rank space so no plates should be issued until this is resolved.

7.2.23 The operators feel that there are more than enough vehicles at the moment, as all areas and all times of the day are covered. There are traffic management problems meaning cabs find it difficult to gain access to some ranks at certain times of day rather than there being insufficient vehicles. Reasons for this are said to include; congestion at certain times of day, major road works and bus stops and drop offs blocking access to the station.

7.2.24 The taxi operators would like to see a rank on Terminus Road if the road was made one-way as buses frequently use the road. Taxi operators and the rail station are in favour of a £3 charge for access to the back of the station however, the Highways team have not responded to the proposal as of yet.

7.2.25 The last study stated that there was no unmet demand in Brighton and Hove, yet the council issued more plates. The last report was used to justify extra wheelchair accessible licences although there was no unmet demand. Operators use both private hire vehicles and Hackney Carriages and most of the time customers do not care which type of vehicle they receive, but if an accessible vehicle is requested the operator can send either an accessible hackney carriage or private hire vehicle depending on what is available. The operators stated that drivers from a particular taxi firm get credited an extra £5 if they have to go out of an area that they are in to cover a wheelchair fare.

7.2.26 Operators feel that there are enough wheelchair accessible vehicles as the 5 plates that are issued every year are required to be wheelchair accessible. Private hire vehicles that can carry over four passengers are also required to be wheelchair accessible.

7.2.27 Operators feel that drivers are quite safe, as they are streetwise and there is not much trouble in Brighton and Hove.

7.2.28 It is felt that vehicle quality has increased during recent years. Operators would like to see a verbal test detailing routes, similar to the training for London taxi drivers. Operators also felt that the council's dress code is beneficial to the trade, and they would like to see a formal one put in place.

7.2.29 With regards to ranks, operators feel that there is a lack of rank space, especially at the Ship Street rank and the fact that ranks have been removed such as the rank on North Street rank adds to the overall lack of rank space in Brighton & Hove. It is felt that ranks are not always in the most appropriate location.

7.2.30 Operators have identified three main ranks that are reputable for anti social behaviour. These are the ranks on West Street, East Street and at the Old Ship Hotel. It is felt that the marshal trial was successful, and operators would like to see it in operation again on a Thursday, Friday and Saturday night. However, they feel that the trade should not have to meet the whole cost and clubs should contribute too along with the police.

Disability Representatives and Social Services

7.2.31 Two focus groups were held to consult with disability representatives and social services. The findings from both meetings are summarised here.

7.2.32 The representative for disability groups states that there is an issue trying to book wheelchair accessible vehicles. It is considered wheelchair accessible vehicles tend to be independent and don't always use a circuit. They tend to work from the rank and 'cherry pick' jobs. During term time between 08:10 – 09:30 and 14:30 – 15:45 it was felt that it was incredibly hard, and sometimes impossible, to secure a booking as the vehicles were being used for school runs. Other times that are difficult to get a taxi were Saturday and Sunday mornings as many drivers will have worked late the night before. Later on in the evening when larger taxis are requested by those travelling in groups for nights out was also cited as a difficult period to secure a booking over the phone. Companies tend to pay drivers £5 per job to take on wheelchair jobs, which is not enough as wheelchair accessible vehicles are expensive to run. Wheelchair users will stop using taxi services if it is too difficult to book and will make other arrangements instead.

7.2.33 The problems with availability were most common when travelling from home and having to book over the phone. At present when trying to pre-book customers are generally told to ring back 15 minutes before they need to leave as the taxi companies are never sure which vehicles will be in their area at the time. This can then result in them being told close to when they need to leave that there are no vehicles in the area. It may be the case that there are accessible vehicles working that day but the company's only radio within a certain radius. As most drivers work for taxi companies it is not permitted to take an individual driver's number in order to call them to book them directly.

7.2.34 Some representatives felt that overall there are enough vehicles and there is no need for more vehicles. The ranks in the city centre tend to have plenty of wheelchair accessible hackney carriages. It was suggested that the existing ones just need to be on radio circuits so they can be booked more easily. There is also a need to ensure some work at night and also operate outside of the city centre.

7.2.35 It was felt that there was a general lack of adequate information on taxi services. Two representatives which had their own vehicles commented that they did not feel they were well informed and would find it hard to book a taxi. For those that use taxis regularly they felt that there was no way of knowing whether or not when you ring there will be a taxi in operation which will accommodate you. There is no information on which taxi companies have what types of vehicles working for them at any one time and this raises uncertainty about whether or not you will be able to undertake a particular journey at a particular time. It would also be important for any information provided to not be solely web-based as there were many people who did not have access to information presented in this way. Some of the disability representatives felt uninformed and were interested to know the following:

- What training do drivers have to undertake in order to qualify for their licence?
- Whether taxi drivers as part of their licence agreement are contracted to do school runs?

7.2.36 With regards to vehicle quality, representatives felt that the Hackney Carriages in Brighton and Hove look one of the best in the country. There were no problems raised with regards to the cleanliness or upkeep of vehicles. The only issues raised with regards to vehicles were the physical specifications of some of them:

- Headroom – those taller members with larger chairs were simply not able to fit in a standard hackney carriage
- Clamps – If a chair has non-uniform wheels/frames etc, it is not able to be attached to the vehicle with straps or other mechanisms and in this case the drivers would not be keen to take wheelchair passengers as their insurance is not valid.
- Ramps – Problems were found when ramps were not one single plate e.g. two tracks are not appropriate if a chair's wheels are not inline at the front and back.

7.2.37 It is felt that drivers' awareness of disabilities is not great; for example mobility impaired people are not helped with luggage. Driver attitude was felt to be a deterrent to using taxis as a number of those attending had had bad experiences in the past mainly due to driver ignorance. The main frustration was that there are lots of highly capable and helpful drivers with good vehicles but it is not possible to book particular drivers with the way the system works at present. Several occasions were cited when the vehicle which turned up after booking was not appropriate or the driver was not equipped to take them because of his/her own capabilities. Other occasions where individuals have had problems regarding taxi drivers were cited as:

- Drivers starting meter before wheelchair user has been loaded in or out of the taxi
- Drivers arriving in vehicle they share or have borrowed and thus do not know how to use the ramp, clips etc
- Drivers not understanding the need to get out of the taxi for blind or visually impaired individuals to let them know they have arrived
- Drivers generally being unwilling to help you, trying to charge you extra or not displaying good manners
- Drivers driving off when they see the user has a guide dog
- Drivers not being able to take a guide dog because of asthma (this should be established at the booking stage)
- Drivers not knowing the specifications of their own fleet vehicles when asked at the time of booking
- Drivers not being able to help a wheelchair user up the ramp due to a bad back.

7.2.38 In terms of social services contracts feedback on driver performance is generally positive. It is felt that driver continuity is good and the only odd problems are with new drivers.

7.2.39 With regard to training, representatives feel that it should be updated and refresher training is needed after obtaining driving experience. Laws are changing and so training standards should be updated to fit in with new standards as necessary. It is felt that drivers for the educational transport fleet should have the NVQ driver qualification. Training should be given on how to use wheelchair accessible vehicles when they are bought new and when they are resold. Free training could be offered with 'Train to Gain'. As Brighton is a tourist town, the representatives felt having a good wheelchair accessible service would be beneficial to the town and the economy, as it will attract more people.

7.2.40 Representatives state that the council give £65 worth of taxi vouchers if a bus pass is not taken up. However, this does not go very far in comparison to other areas. It is not uncommon for a journey in to Brighton to cost between £15 and £30, depending on where the individual lived, so the £65 a year voucher is seen as little compensation. As not all buses in Brighton and Hove are accessible by wheelchair, but some are, it was not seen as fair that some individuals had to sacrifice their bus passes in order to get the taxi vouchers and that these two concessions should not be mutually exclusive.

7.2.41 It was also mentioned that there was inconsistency between fares charged and that it was nearly always cheaper to use a local company and the return journey from a rank in Brighton/Hove would always be more expensive.

7.2.42 Possible solutions put forward by the representatives to address the issues highlighted included:

- Driver refresher training to instil in them how to deal with people with mobility impairments and communicate any updates
- Changes to the booking system
- Allowing pre-booking of accessible vehicles
- Thorough standardised questioning at the time of booking to avoid confusion
- More vouchers should be given as compensation for not taking up a bus pass, or fares should be made cheaper.

Police

7.2.43 A representative from the police took part in the consultation. The police representative said that Brighton & Hove is served by very good public transport and there is a good supply of taxis. It was identified that there can be an issue of congestion at the rail station rank when the rank is full. It was also noted that there are too many taxi permits in Brighton & Hove.

7.2.44 Since the Old Ship rank was removed taxis have been parking on the carriageway causing congestion and safety issues. The representative felt that the rank should be reinstated.

7.2.45 There have also been discussions of a new rank on Queens Road opposite the old casino. This would be used as a feeder rank to the rail station and help address the congestion and safety issues which effect this area.

7.3 Indirect Consultation

7.3.1 In addition to the face to face consultation undertaken a number of stakeholders were contacted by letter. This in turn assured the DfT guidelines were fulfilled and all relevant organisations and bodies were provided with an opportunity to comment. Copies of all the replies are included in Appendix 4.

7.3.2 In accordance with guidance issued by the DfT the following stakeholders were contacted:

- Brighton and Hove City Council;
- Police;
- Schools and Colleges;
- Charitable organisations;
- Disability organisations;
- Business Representatives;
- Licensed Premises; and
- Hotels.

7.3.3 The comments received are outlined below.

Sussex Deaf Association

7.3.4 A representative from the Sussex Deaf Association responded to the letter of written consultation. It was felt that the adequacy of both hackney carriages and private hire vehicles is adequate across all times of the day and across all areas in Brighton and Hove.

7.3.5 With regard to the image of the trade the representative felt that the quality and type of the vehicles are 'ok'. It was commented upon that drivers are often asking for payment from loan females before they get into the cab or refusing to take them. Drivers can also be unclear of destinations and are taking longer routes; it was felt that additional training would be beneficial with regard to area knowledge.

7.3.6 The representative did not feel that any additional ranks are required in Brighton and Hove and no improvements are needed at existing ranks.

7.3.7 It was felt that additional wheelchair accessible vehicles are needed in Brighton and Hove as users at the Deaf Association find it very difficult to access one; when pre booking wheelchair accessible vehicles users have to wait approximately 45 minutes. The representative would also like to see an improvement to taxis to make them more accessible to deaf people as they are often unable to communicate with the driver.

7.3.8 The fare structure in Brighton and Hove was considered high at all times and it was felt that there is sufficient advertising of both private hire and hackney carriage services.

7.3.9 A comment was made about some drivers driving too fast and going through red lights, making the representative feel unsafe. They would also like to see marshals at ranks to make them feel safer whilst waiting at ranks.

7.3.10 Finally, the representative felt that taxis complement other types of public transport in Brighton and Hove and that they are often better than buses.

Children and Young People's Trust Transport

7.3.11 A representative from the CYPT Transport responded to the written consultation. It was felt that the supply of vehicles is generally adequate, however when the weather is bad taxis are often late, even though they have been pre booked. It was thought that drivers try and fit in extra jobs before the school journeys.

7.3.12 With regard to the image of the trade, the representative commented that overall the hackney carriage trade in Brighton and Hove is reasonably well regarded. The cars are easily recognisable as taxis. The majority of drivers are friendly and polite; some have good relationships with the children and assist them far beyond their duty, which on occasion has become a problem if they become too close.

7.3.13 The representative did not feel that additional wheelchair accessible vehicles are needed. On the education contract wheelchair taxis are booked in September and cars are allocated for the school year. However if an additional wheelchair accessible vehicle is needed the CYPT is required to ring up one hour before the vehicle is needed to determine how many vehicles will be available. This system has lead to people being late for appointments but generally there are enough taxis.

7.3.14 There are many different types of wheelchair and with regard to the type of taxi vehicle, it would be virtually impossible to cover all disabilities, even people without a noticeable disability cannot access some of the vehicles. There is a particular problem with powered wheelchairs as they are often heavy and some vehicles may not be able to take them.

7.3.15 It was considered that the level and structure of the fares is quite expensive in comparison to other areas. Contracts for both education and social care are run on a pre-negotiated contract; however the hackney fare rate does have an effect on contract prices.

7.3.16 With regard to publicity, there appears to be plenty of advertising for various companies however it is not really relevant to social care and transport business.

7.3.17 The representative commented that they would like to see taxi marshals at ranks and also thought it would be of benefit for them to carry out spot checks on drivers on behalf of the public as, on occasion, it has been suggested that unqualified drivers have been driving hackney cabs although the representative has seen no evidence of this. A PIN system could help prevent this, although it could easily be abused.

7.3.18 It was felt that taxis complement other types of public transport in Brighton and Hove reasonably well. Both taxis and buses have moved towards increased numbers of accessible vehicles. Not everyone lives on a direct bus route and given the good taxi services to and from the railway stations, the overall transport coverage and access is reasonable

Sussex Police

7.3.19 A representative from the Sussex Police responded to the letter of written consultation. It was stated that the taxi rank outside the Old Ship Hotel has been lost due to the widening of the pavement. It is now very dangerous as taxis are queuing up on the inside lane of the dual carriage way. The situation is exacerbated by taxis then doing u-turns in the road.

7.3.20 The representative commented that the best way to over come this problem would be to have Security Industry Authority (SIA) trained taxi marshals at the ranks. However, it was acknowledged that financing this would be an issue.

Community Base

7.3.21 A representative from Community Base provided comments on the provision on taxi ranks in Brighton and Hove.

7.3.22 It was felt that the lights on taxis in Brighton are confusing as they are lit when the taxi is not currently charging a customer, this is regardless of whether they are on the way to pick up a passenger or not. In other areas, the light is on if the vehicle is available for hire which is what many people assume in Brighton.

7.3.23 The representative stated that this is becoming an issue as she has witnessed many people run for taxis which they are then turned away from. The light should tell the public something about the taxi, they want to know whether or not it is available for hire, not if it is making money. The representative would like to see the meaning of the lights changed in Brighton to the same as other places to avoid confusion.

Culture and Economy Department, Brighton and Hove City Council

7.3.24 A representative from the Culture and Economy Department at Brighton and Hove City Council responded to the consultation. It was felt that the supply of hackney carriages is adequate across the city at all times, although more effort could be made to signpost directions to the nearest taxi rank.

7.3.25 The representative was unaware that there are private hire vehicles in Brighton and Hove.

7.3.26 It was felt that the majority of vehicles are in good condition, although with regard to a minority of vehicles it is questionable how they passed their MOT. The representative commented that driver attitudes can vary but generally avoids conversation with them as they only want to discuss how rubbish the council is. The representative has also witnessed drivers going through red lights, smoking in their vehicles and talking on their mobile phones.

7.3.27 The representative commented that many drivers rely on satellite navigation systems and often take a longer route or be unaware of the trend of traffic in the City. It is clear to see which drivers have been in the trade longer.

7.3.28 With regard to ranks, it was felt that there could be more in Kemptown and better signposting to ranks is needed.

7.3.29 The representative stated that fares are definitely too high, the representative has complained on several occasions that drivers start the meter before they pick you up. They also add a fee for calling a taxi as they class this as 'pre booked' although you are unable to flag them down.

7.3.30 It was felt that there is sufficient publicity about taxi contact numbers but not about the rank locations.

7.3.31 The representative has never felt unsafe whilst using taxis in Brighton and Hove but generally would not wait at a rank late at night, especially in the town centre areas.

8 Trade Survey

8.1 *Introduction*

8.1.1 A trade survey was designed with the aim of collecting information and views from both trades. In particular the survey allowed an assessment of operational issues and views of the hackney carriage market to supplement the rank observations, as well as covering enforcement and disability issues. The following Section summarises the results of the trade survey and full results are presented in Appendix 5.

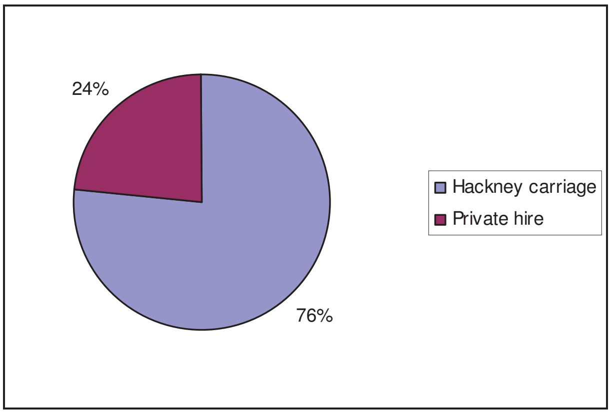
8.2 *Survey Administration*

8.2.1 The survey was conducted through a self completion questionnaire. These were sent to 2,800 licensed public and private hire drivers in Brighton and Hove. A total of 506 questionnaire forms were completed and returned, giving a response rate of 18%. It should be noted that not all totals sum to the total number of respondents per trade group as some respondents failed to answer all questions.

8.3 *General Operational Issues*

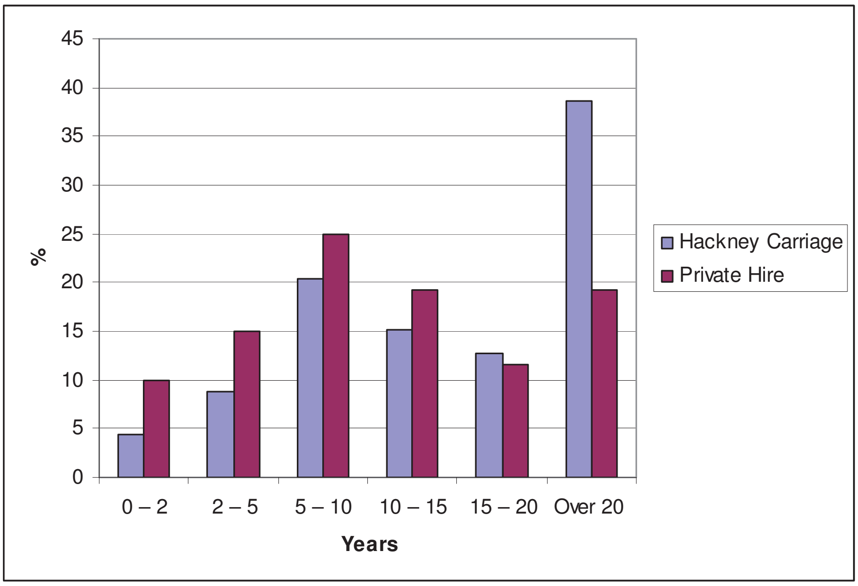
8.3.1 The responses provided have been disaggregated to show the variations in hackney carriage and private hire trade responses. Over three quarters of responses were from those in the hackney carriage trade as shown in Figure 8.1 below.

Figure 8.1: Breakdown of Responses between Trades



8.3.2 Figure 8.2 indicates that 39% of the hackney carriage trade have been involved in the Brighton and Hove taxi trade for more than 20 years as have 19% of the private hire trade.

Figure 8.2: Duration of the respondents' involvement in the hackney carriage trade/private hire trade.



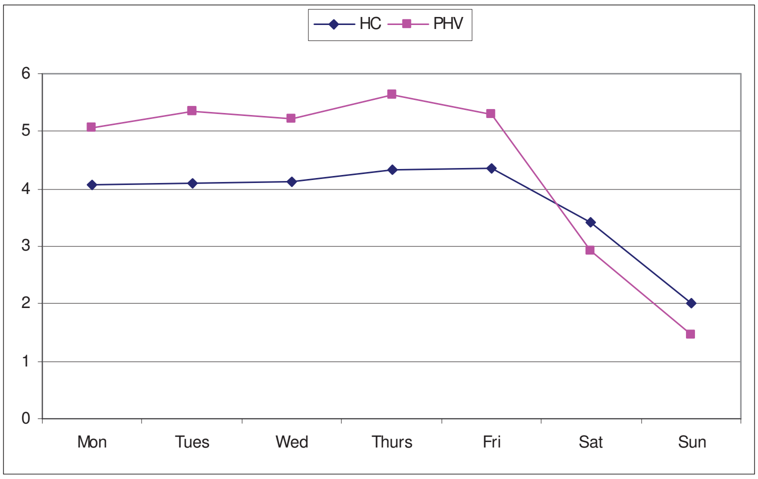
8.4 Driving

8.4.1 Respondents were asked what type of vehicle they drive most frequently. The majority of hackney carriage drivers (74%) and private hire drivers (85%) drive a saloon car.

8.4.2 Respondents were asked on average the number of hours they worked in a typical week. The hackney carriage trade cited an average of 46.2 hours per week compared with an average of 48.4hours per week for the private hire trade.

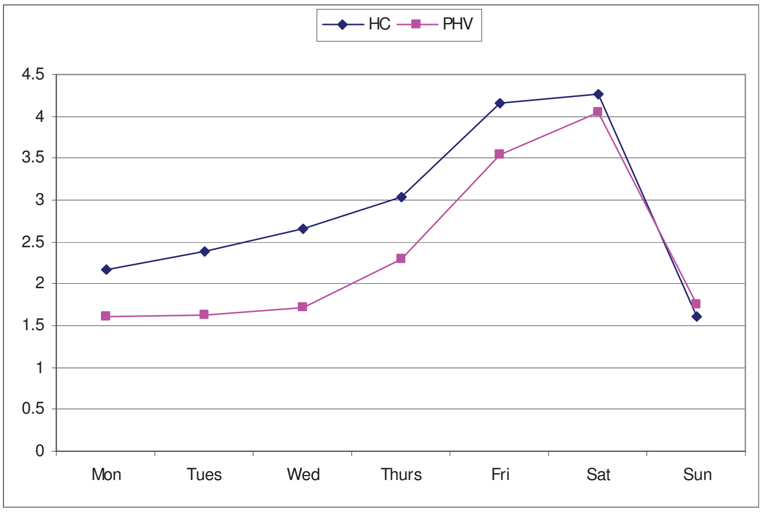
8.4.3 Respondents were asked to state how many hours they worked at different times of day during a typical week. Figure 8.3 documents the average hours worked during the daytime period (06:00-18:00) for each day of the week. On average, hackney carriage trade work a similar amount of hours to the private hire trade. It shows that the hackney carriage trade work less hours during the weekday daytime, whilst the private hire trade work less hours on a weekend daytime. Additionally, both trades work more during the week daytimes than the weekends.

Figure 8.3: Average daytime hours worked



8.4.4 Figure 8.4 shows the average number of hours worked during the evening/night period (18:00-06:00). The hackney carriage trade work, on average, longer hours on every night except Sunday, both trades work longer on Monday and Friday evenings.

Figure 8.4: Average night time hours worked



8.4.5 The trade were asked whether the Licensing Act 2003 had had an effect on their typical working week. Half of hackney carriage respondents stated that it had had an effect on them compared with 31% of private hire respondents.

8.4.6 Those who replied that it had had an effect on their typical working week were then asked in what way it had affected them. The results are shown below in Table 8.1.

Table 8.1: Effects of the 2003 Licensing Act (Multiple responses)

	Hackney Carriage Trade		Private Hire Trade	
	Frequency	Percent	Frequency	Percent
Work later in the evening	117	64.3	18	51.4
Work for longer hours	112	61.5	21	60.0
Other	22	12.1	6	17.1

8.4.7 Some 64% of hackney carriage respondents and 51% of private hire drivers stated that they work later in the evening.

8.4.8 Respondents were asked to state the number of times they carry disabled passengers on a weekly basis. Table 8.2 provides the results. Some 60% of hackney respondents and 57% of Private Hire respondents stated that they carry disabled passengers 1 to 5 times a week.

Table 8.2: Frequency of Transport of Disabled Persons

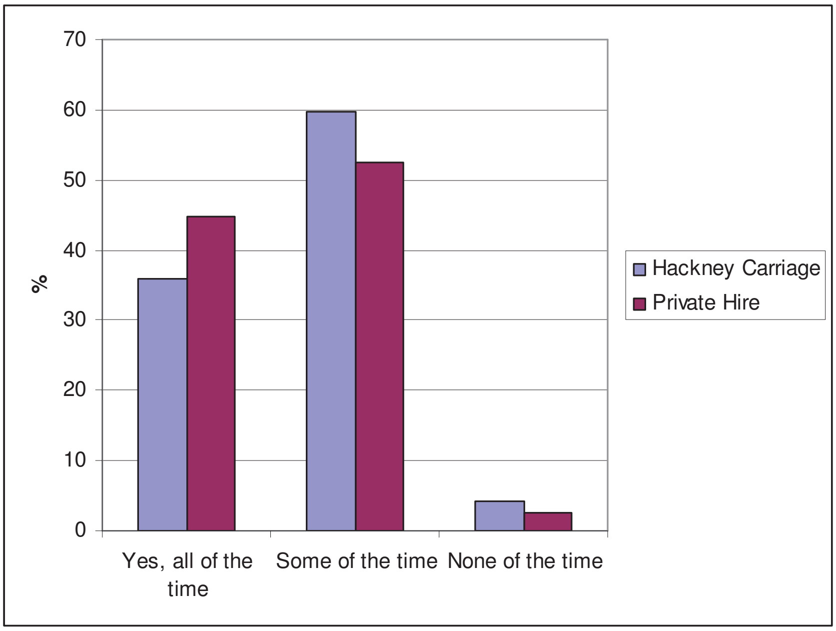
	Hackney Carriage Trade		Private Hire Trade	
	Frequency	Percent	Frequency	Percent
Never	84	22.5	23	20.0
1 to 5	222	59.5	66	57.4
5 to 10	44	11.8	20	17.4
10 to 20	19	5.1	5	4.3
More than 20	4	1.1	1	0.9
Total	**373**	**100.0**	**115**	**100.0**

8.5 Safety & Security

8.5.1 The questionnaire asked if drivers had been attacked by a passenger within the last year. Some 10% of hackney carriage drivers and 7% of private hire drivers stated that they had been physically attacked in the last year. Whilst 42% of hackney carriage respondents and 22% of private hire respondents had been verbally attacked.

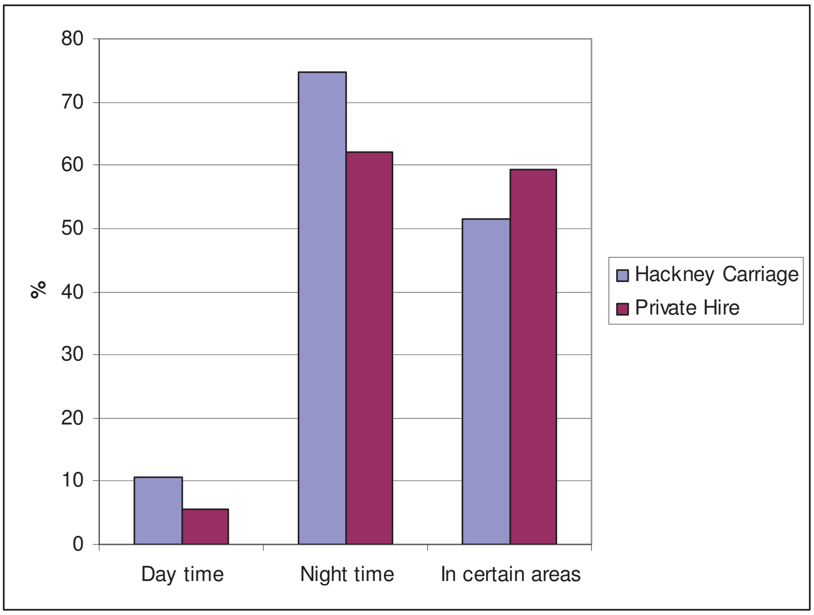
8.5.2 Respondents were then asked if they felt safe whilst working as a taxi driver in Brighton and Hove, the results of which are shown below in Figure 8.5. The majority of all hackney carriage respondents stated that they felt safe some of the time (60%), as did the majority of the private hire respondents (53%).

Figure 8.5: Do you feel safe whilst working as a Taxi Driver in Brighton and Hove?



8.5.3 Of those stating that they felt unsafe, 75% of hackney carriage and 62% of private hire respondents stated that they felt unsafe whilst working at night in Brighton and Hove.

Figure 8.6: When do you feel unsafe as a taxi driver in Brighton and Hove?



8.5.4 Some 52% of the hackney carriage trade stated that they feel unsafe in certain areas of Brighton and Hove, as did 59% of the private hire trade. The areas most commonly reported as being unsafe were;

- Whitehawk; and
- Moulsecoomb

8.6 Ranks

8.6.1 Members of both trades were asked whether they believe there is sufficient rank space in Brighton and Hove. Some 89% of hackney carriage respondents stated that there was not sufficient rank space in Brighton and Hove, as did 64% of the private hire trade.

8.6.2 Respondents were then asked if there were any areas in Brighton and Hove where new ranks should be introduced. Some 60% of private hire respondents said there were no areas where new ranks were required, whilst 76% of hackney carriage respondents said there were areas where new ranks were needed.

8.6.3 Respondents were then asked in what locations the new ranks were required. The most popular locations suggested were;

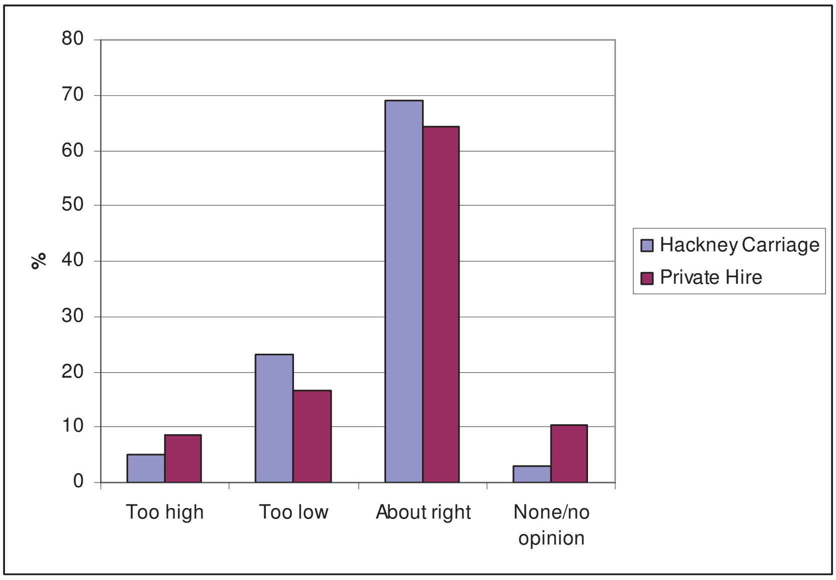
- Brighton Station, Queens Road; and
- Old Ship Hotel, Kings Road

8.7 Fares

8.7.1 Members of both trades were asked for their opinions regarding the current level of hackney carriage fares, the results are documented in Figure 8.7.

8.7.2 Some 69% of hackney carriage respondents considered hackney carriage fares to be 'about right'.

Figure 8.7: View of Hackney Carriage Fares



8.8 Training

8.8.1 Both trades were asked if they felt that taxi drivers receive enough training before being granted a licence. Two thirds of the hackney carriage trade (66%) and 73% of the private hire trade were of the opinion that training was insufficient. Those respondents who stated that they didn't think they received sufficient training were then asked what training they would like to see offered to drivers. The results are shown in Table 8.3 below.

Table 8.3 What additional training is necessary? (Multiple Responses)

	Hackney Carriage Trade		Private Hire Trade	
	Frequency	**Percent**	**Frequency**	**Percent**
BTEC/NVQ	40	11.2	16	18.0
English Language	224	62.6	82	92.1
Disability Awareness	100	27.9	32	36.0
Knowledge Test	179	50.0	62	69.7
Customer Care	161	45.0	68	76.4
Driving Ability Test	168	46.9	54	60.7
Other	34	9.5	6	6.7

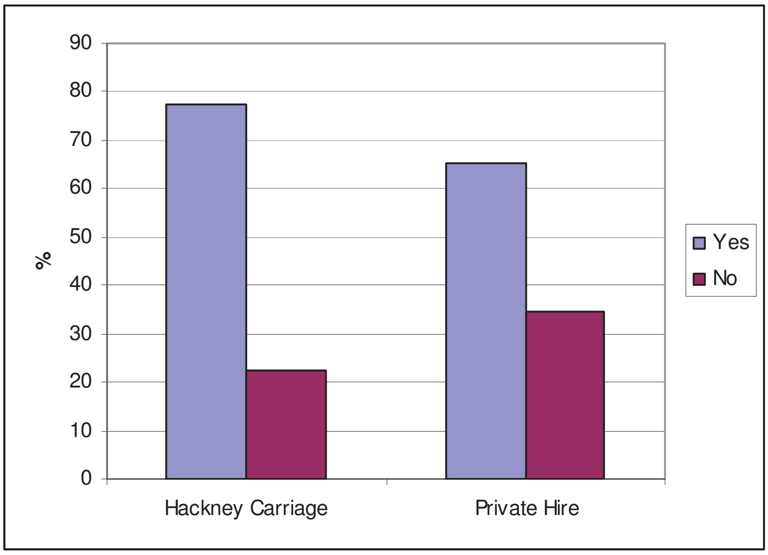
8.8.2 The majority of the hackney carriage trade (92%) felt that English language is the most important training they would like to see offered to drivers as did 63% of private hire respondents. The next most popular training requests were a knowledge test, customer care and a driving ability test.

8.8.3 Respondents were then asked whether this training should be compulsory or voluntary. Of those who answered this question, some 99% of the private hire trade said that the training should be compulsory as did 97% of the hackney carriage respondents.

8.9 Taxi Market in Brighton and Hove

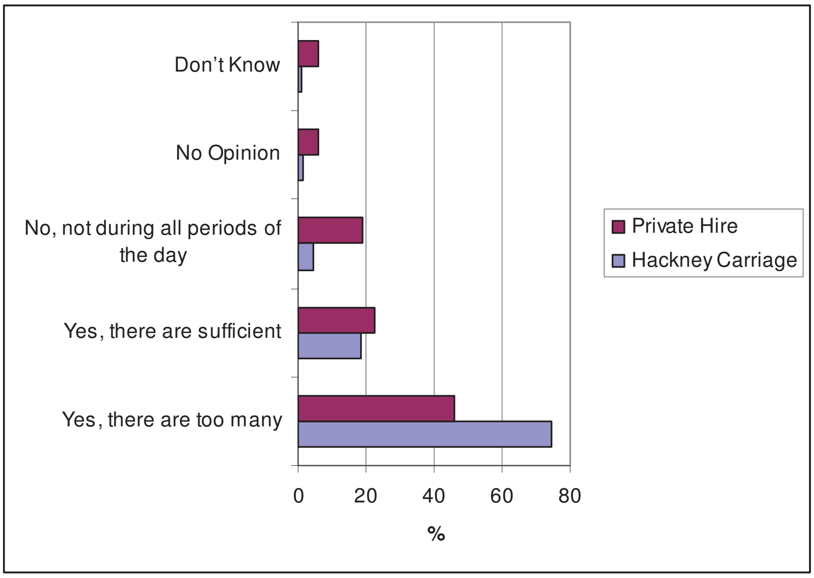
8.9.1 Members of both trades were asked if they were aware that Brighton and Hove City Council enforces a numerical limit of 523 on the number of hackney carriage vehicle licences in the city. The results are outlined in Figure 8.8.

Figure 8.8: Were you aware that there is a numerical limit on the number of hackney carriage vehicle licences in Brighton and Hove?



8.9.2 The majority of the hackney carriage respondents were aware about the numerical limit (78%), 65% of private hire respondents were aware of the restrictions. Members of both trades were asked whether they consider there to be sufficient hackney carriages to meet the current level of demand in Brighton and Hove. Figure 8.9 indicates that the majority of respondents from the hackney carriage trade (75%) consider there to be too many hackney carriages, compared to 46% of private hire drivers. Some 19% of hackney carriage respondents and 23% of private hire respondents felt that there were sufficient hackney carriages in Brighton and Hove.

Figure 8.9: Do you consider there to be sufficient hackney carriages to meet the current level of demand in Brighton and Hove?



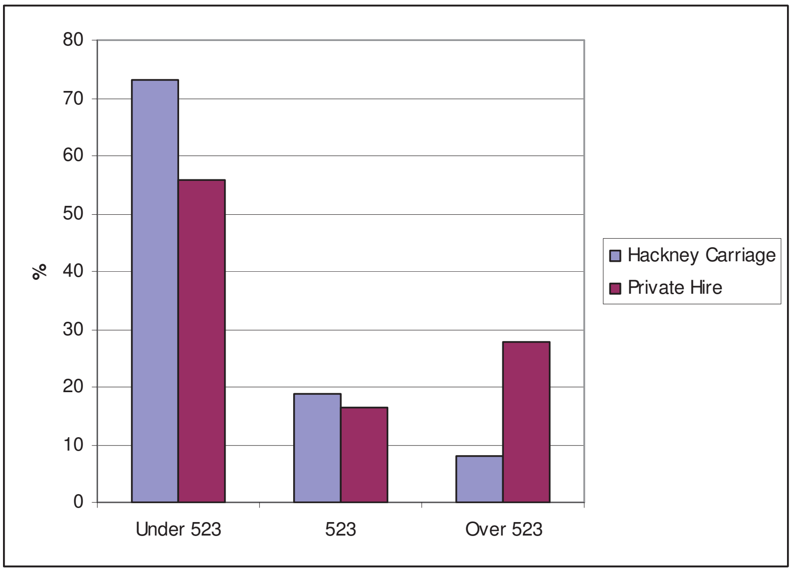
8.9.3 Those respondents stating that there were insufficient hackney carriages operating in Brighton and Hove were asked what times of day additional carriages are required. The results are summarised in Table 8.4. Of those respondents that felt there was an insufficient supply of hackney carriages operating in Brighton and Hove, 69% of the hackney carriage and 62% of private hire respondents stated that more hackney carriages were required in Brighton and Hove during the evening and night.

Table 8.4: If insufficient, when are more hackneys carriages required?

	Hackney Carriage Trade		Private Hire Trade	
	Frequency	Percent	Frequency	Percent
During the daytime	0	0.0	1	4.8
During the evening/night	11	68.8	13	61.9
All day and night	5	31.2	7	33.3
Total	**16**	**100.0**	**21**	**100.0**

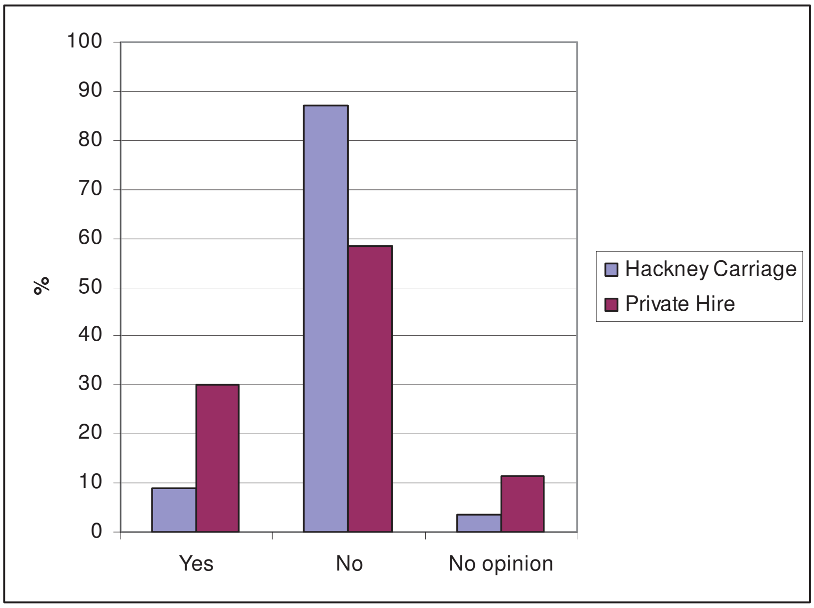
8.9.4 All respondents were asked to state the ideal fleet size for hackney carriages in Brighton and Hove. The results are detailed in Figure 8.10. Of those drivers who responded, 19% of the hackney carriage trade felt that the fleet size should stay at the current number, as did 16% of the private hire trade. The majority of the private hire trade (73%) felt that the fleet should be lower than 523 as did 56% of hackney carriage respondents.

Figure 8.10: Opinion of the Ideal Hackney Carriage Fleet Size.



8.9.5 All respondents were asked to state if they thought that Brighton and Hove City Council should remove the numerical limit on the number of hackney carriage vehicle licences. The responses are detailed in Figure 8.11.

Figure 8.11: Should Brighton and Hove City Council remove the numerical limit?



8.9.6 The majority of respondents from the hackney carriage trade (87%) felt that the numerical limit should not be removed compared with 58% of the private hire respondents. Some 30% of the private hire respondents thought the limit should be removed.

8.9.7 Views were sought regarding the likely impact on a series of factors if Brighton and Hove City Council were to remove the existing limit on hackney carriage licences. The findings are summarised below and are presented in Table 8.5. .

<u>Congestion</u>

8.9.8 Some 83% of respondents from the hackney carriage trade felt congestion would increase, compared with 46% of the private hire trade who that felt this would be the case.

<u>Fares</u>

8.9.9 Some 24% of hackney carriage respondents considered that there would be an increase in fares following de-restriction, compared with 19% of the private hire trade.

Passenger Waiting Times

8.9.10 The majority of respondents from both trades believed that passenger waiting times at ranks, when flagged or when booked by telephone, would decrease or not be affected.

Vehicle Quality

8.9.11 The majority of hackney carriage respondents believe that hackney carriage and private hire vehicle quality would decrease, whereas the majority of private hire respondents believe that there would be no effect on vehicle quality.

Effectiveness of Enforcement

8.9.12 With regard to effectiveness of enforcement, 67% of the hackney carriage trade were of the opinion that removing existing licence restrictions would result in a decrease, with 41% of the private hire trade being of the same opinion.

Illegal Plying for Hire

8.9.13 In terms of illegal plying for hire by private hire vehicles, 55% of the hackney carriage trade were of the opinion that a change in licence restriction conditions would increase this activity, compared to 31% of private hire drivers. Some 55% of the hackney carriage trade felt that illegal plying for hire by unlicensed vehicles would increase compared with 38% of the private hire trade.

Over Ranking

8.9.14 Both the hackney carriage and private hire trade felt over ranking would increase, with a response rate of 89% and 70% respectively.

Customer Satisfaction

8.9.15 Some 10% of hackney carriage drivers were of the opinion that customer satisfaction would increase as a result of the removal of the licence limit, compared to 35% of the private hire trade.

Table 8.5: What would happen should Brighton and Hove City Council remove the limit?

	Hackney Carriage Trade (%)			Private Hire Trade (%)		
	Increase	No Effect	Decrease	Increase	No Effect	Decrease
Traffic Congestion	82.7	15.6	1.6	46.2	43.4	10.4
Fares	23.8	51.3	24.9	18.9	64.2	17.0
Passenger waiting times at ranks	6.0	74.8	19.2	3.8	41.5	54.7
Passenger waiting time when flagdown	5.2	71.1	23.6	4.6	39.4	56.0
Passenger waiting time by telephone	13.7	69.2	17.2	9.5	55.2	35.2
Hackney carriage vehicle quality	6.1	27.8	66.1	4.7	57.0	38.3
Private hire vehicle quality	5.8	30.1	64.0	8.3	58.7	33.0
Effectiveness of enforcement	9.1	23.5	67.4	8.5	50.9	40.6
Illegal plying for hire – private hire	54.7	26.1	19.2	30.9	38.2	30.9
Illegal plying for hire – unlicensed	55.1	31.5	13.4	37.7	39.6	22.6
Over ranking	89.2	6.8	4.1	69.7	22.0	8.3
Customer satisfaction	10.0	40.2	49.9	34.9	41.3	23.9

8.9.16 Respondents were then asked their opinion on a series of statements. The first statement was ***'There is not enough work to support the current number of hackney carriages'***. The results are shown in Table 8.6.

Table 8.6 'There is not enough work to support the current number of hackney carriages'

	Hackney Carriage Trade		Private Hire Trade	
	Frequency	Percent	Frequency	Percent
Strongly disagree	19	5.2	14	13.3
Disagree	12	3.3	11	10.5
Neither agree nor disagree	24	6.6	20	19.0
Agree	88	24.0	24	22.9
Strongly agree	223	60.9	36	34.3
Total	**366**	**100.0**	**105**	**100.0**

8.9.17 Over half of hackney carriage respondents (61%) strongly agree with the statement that there is not enough work to support the current number of hackney carriages. Some 34% of private hire strongly agree that there is not enough work.

8.9.18 The following comments were recorded:

- 'Hackney carriage drivers wait up to one hour for a job'
- 'Too many taxis at present' and
- Ranks are full of taxis all the time.

8.9.19 The second statement was 'Removing the limit on the number of hackney carriages in Brighton and Hove would benefit the public by reducing the waiting time at ranks'. The results are outlined in Table 8.7.

Table 8.7: 'Removing the limit on the number of hackney carriages in Brighton and Hove would benefit the public by reducing the waiting time at ranks'

	Hackney Carriage Trade		**Private Hire Trade**	
	Frequency	**Percent**	**Frequency**	**Percent**
Strongly disagree	193	54.8	30	28.6
Disagree	69	19.6	21	20.0
Neither agree nor disagree	27	7.7	11	10.5
Agree	29	8.2	20	19.0
Strongly agree	34	9.7	23	21.9
Total	**352**	**100.0**	**105**	**100.0**

8.9.20 Some 74% of hackney carriage drivers strongly disagreed or disagreed that removing the limit on the number of hackney carriages in Brighton and Hove would benefit the public by reducing waiting times at ranks, compared to 49% of Private Hire respondents.

8.9.21 The following comments were recorded:

- 'Ranks are always full of taxis' and
- 'Customers do not have to wait at ranks'

8.9.22 The third statement was ***'There are special circumstances in Brighton and Hove that make the retention of the numerical limit essential'***. The results are shown in Table 8.8 below.

Table 8.8: 'There are special circumstances in Brighton and Hove that make the retention of the numerical limit essential'

	Hackney Carriage Trade		Private Hire Trade	
	Frequency	**Percent**	**Frequency**	**Percent**
Strongly disagree	36	10.9	29	28.7
Disagree	16	4.8	11	10.9
Neither agree nor disagree	28	8.5	17	16.8
Agree	61	18.4	16	15.8
Strongly agree	190	57.4	28	27.7
Total	**331**	**100.0**	**101**	**100.0**

8.9.23 Some 76% of hackney carriage trade agree or strongly agree that there are special circumstances in Brighton and Hove that make the retention of the numerical limit essential, compared to 44% of the private hire trade.

8.9.24 The following comments were recorded:

- 'Seasonal Trade'
- 'To maintain a good quality of service' and
- 'Too many taxis already'

8.9.25 All respondents were asked what the effect on themselves would be if the numerical limit was removed. The results are outlined below in Table 8.9.

8.9.26 Finally the trade were asked what effect they thought it would have on them if the authority removed the numerical limit. The results show that 70% of hackney carriage respondents cited they would work more hours if the numerical limit on hackney carriages was removed in comparison to 49% of private hire respondents. Some 33% of private hire drivers said they would not change if the limit was removed. Some 41% of hackney carriage respondents would leave the trade, as would 15% of private hire respondents. However some 42% of private hire respondents would switch from private hire to hackney carriage.

Table 8.9: Effects of removing limit (Multiple Responses)

	Hackney Carriage Trade		Private Hire Trade	
	Frequency	**Percent**	**Frequency**	**Percent**
I would continue as normal	47	12.3	38	33.3
I would expect to work more hours	267	70.1	56	49.1
I would expect to work fewer hours	6	1.6	0	0.0
I would acquire a hackney carriage licence	24	6.3	36	31.6
I would acquire multiple hackney carriage licences	14	3.7	6	5.3
I would switch from hackney to private hire	12	3.1	1	0.9
I would switch from private hire to hackney	7	1.8	48	42.1
I would leave the trade	155	40.7	17	14.9
Other	34	8.9	4	3.5

8.9.27 Key results from the Trade Survey can be summarised as;

Summary

Key findings from the survey can be summarised as follows:

- The majority of the hackney carriage trade and private hire trade thought training was not sufficient and English language training in particular was required.
- Majority of drivers feel safe some of the time whilst working in Brighton and Hove
- Some 88.7 of hackney carriage respondents stated that there was not sufficient rank space in Brighton and Hove
- Some 40.7% of hackney respondents stated that they would leave the trade should the authority de-restrict.

9 Disabled Access

9.1 Introduction

9.1.1 In line with a request from Brighton & Hove City Council an assessment of the level of supply across the hackney and private hire car fleets in Brighton & Hove was undertaken.

9.2 Current Provision

9.2.1 Brighton and Hove Council currently license 126 wheelchair accessible taxis. This equates to 24% of the fleet. There are also 21 wheelchair accessible private hire vehicles licensed equating to less than 5% of the fleet.

9.3 Observed demand

9.3.1 During the rank observation programme ten wheelchair users were observed hiring a taxi. Four were observed at Brighton Station rank, three at the East Street rank, two at St Peters Place rank and one at the Paston Place rank. In total there were 52,542 observed passenger departures indicating there is not a significant demand for wheelchair accessible vehicles from ranks in Brighton.

9.3.2 Some 493 on-street public interview surveys were carried out in June 2009. Of these respondents 25 (5%) stated that they considered themselves to have a mobility impairment. Of those using a taxi in the last three months (14), seven people obtained their vehicle at a rank and one obtained a vehicle by flagdown. The remaining six users booked their vehicle by telephone.

9.3.3 To provide evidence relating to suppressed demand in the event of a finding of significant patent unmet demand, respondents were asked to identify whether or not they had given up waiting for a taxi at a rank, on the street, or by telephone in Brighton and Hove in the last three months. Of those citing mobility impairment three respondents had given up waiting for a taxi by either rank or flag down (12%). This is lower than cited by people without a mobility impairment, (13%). Just two respondents (8%) had given up by telephone – the same proportion cited by people without a mobility impairment.

9.4 *Mystery Shopper Survey*

9.4.1 A telephone based mystery shopper survey was carried out to assess the level of supply of hackney and private hire vehicles in Brighton & Hove. The survey determined the average waiting times for a standard vehicle of any type and the waiting times for a wheelchair accessible vehicle to allow an assessment of waiting times for vehicles.

9.4.2 Some forty enquires were undertaken with a range of hackney carriage and private hire taxi operators within Brighton & Hove, half of which asked for an estimate of waiting times for any type of vehicle, and the other half asking for an estimate of waiting times for an accessible vehicle. Table 9.1 summarises the results.

Table 9.1 Waiting Times for Accessible and Standard Vehicles (minutes)

	Minimum Wait Time	Maximum Wait Time	Average Wait Time
Standard Vehicle	5	60	11
Accessible Vehicle	5	60	43

9.4.3 The results indicate that when booking a taxi via the telephone, passengers experience a difference in waiting time for an accessible vehicle than they do for a standard vehicle. The average waiting time for a standard vehicle is low in comparison to the waiting time for wheelchair accessible vehicles.

9.5 *Customer Service*

9.5.1 The customer service was assessed when attempting to book a taxi in Brighton & Hove. The majority of phone operators were polite and helpful. If they did not have a wheelchair accessible vehicle available they would often give the number of another taxi firm who were likely to have one available. There was just one instance where the phone operator was not helpful and was quite rude to the customer.

9.6 *Gauging the need for wheelchair accessible cabs*

9.6.1 From the point of view of significant unmet demand, demand from disabled customers is not relevant. This is because the demand is almost exclusively via telephone bookings and therefore falls beyond the remit of hackney carriages (Brighton ruling).

9.6.2 Given that, at the time of the surveys, the number of accessible vehicles within the entire hackney and private hire car fleet was 147 the following formula provides an estimate of the number of accessible vehicles required to eliminate this discrepancy in waiting times:

$$Q_2 = \frac{D_1}{D_2} \, x \, Q_1$$

9.6.3 Where:

- **D_1** is the average delay for accessible vehicles = 43 minutes;
- **D_2** is the delay for any type of vehicle = 11 minutes;
- **Q_1** is the current number of accessible vehicles in the entire fleet (hackneys plus private hire cars) =147; and
- **Q_2** is the total required number of accessible vehicles required to eliminate this discrepancy in waiting times.

$$Q_2 = \frac{43}{11} \, x \, 147 \; = 574$$

9.6.4 The formula indicates that an **additional 428 accessible vehicles linked to a radio circuit** are required to eliminate the discrepancy in telephone booking waiting times between accessible and non accessible vehicles. It should be noted that this demand for additional vehicles is **private hire demand** and therefore not relevant to the issue of significant unmet demand. This value is also high due to there being only 21 wheelchair accessible vehicles in the private hire fleet. It is also the case that the requirement for additional accessible vehicles is not necessarily a requirement for more licensed vehicles. The discrepancy in waiting times could be alleviated by replacing standard vehicles with accessible vehicles or connecting current accessible vehicles to radio circuits. Nevertheless, it remains the case that it is possible to improve the level of service to disabled people via increasing the number of accessible vehicles available significantly.

10 Summary and Conclusions

10.1 Introduction

10.1.1 Halcrow has conducted a study of the hackney carriage market on behalf of Brighton & Hove City Council.

10.1.2 The present study has been conducted in pursuit of the following objectives:

- to identify whether or not there exists a significant unmet demand for hackney carriage services in Brighton and Hove;
- to recommend the increase in licences required to eliminate any significant unmet demand; and
- to assess any significant unmet demand for disabled access hackney carriage vehicles at ranks and telephone booked demand.

10.1.3 This section provides a brief description of the work undertaken and summarises the conclusions and implications for regulatory policy.

10.2 Significant Unmet Demand

10.2.1 The 2009 study has identified that there is NO evidence of significant unmet demand for hackney carriages in Brighton & Hove. This conclusion is based on an assessment of the implications of case law that has emerged since 2000, and the results of Halcrow's analysis.

10.2.2 On this basis the authority has discretion in its hackney licensing policy and may either:

- continue to limit the number of vehicles at 528 with additional wheelchair accessible licences issued annually as the authority sees fit;
- issue any number of additional plates as it sees fit, either in one allocation or a series of allocations; or
- remove the limit on the number of vehicles and allow a free entry policy.

10.3 *Summary of Consultation – Interested Parties*

10.3.1 The Department for Transport had requested that licensing authorities consult widely to inform their policy making in respect of continued entry control to the hackney carriage market. In addition to the consultation that has routinely been included in previous market studies (correspondence with interested parties), Halcrow has followed the prescribed approach and sought the views of all those involved in the taxi trade.

10.3.2 Stakeholders were generally happy with the numbers of hackney carriages but highlighted more wheelchair accessible vehicles should be made available. Particular problems were highlighted with regard to the availability of accessible vehicles at school contract times. Reference was made to the need to improve driver training opportunities. Rank availability was the other key issue highlighted. It is clear stakeholders do not all consider ranks are sufficient or in the right location.

10.4 *Summary of Consultation – General Public*

10.4.1 Some 493 interviews were carried in June 2009. The key results are as follows:

- Some 63% of respondents had used a taxi in Brighton & Hove within the last three months;
- High levels of satisfaction with delay on last trip
- Some 13% of respondents had given up trying to obtain a vehicle by rank or flagdown;
- Some 55% of respondents feel that taxi services in Brighton & Hove could be improved (need to be cheaper); and
- Majority of respondents felt safe using taxis during the day and night;
- Some 68% of respondents said that they would not be willing to pay a surcharge to fund marshals; and
- Some 44% of respondents stated that they would use pedicabs.

10.5 *Summary of Consultation – Trade*

10.5.1 Some 506 members of the trade responded to a trade survey. The key results are as follows:

- The majority of the hackney carriage trade and private hire trade thought training was not sufficient and English language training in particular was required;
- Majority of drivers feel safe some of the time whilst working in Brighton and Hove;
- Some 89% of hackney carriage respondents stated that there was not sufficient rank space in Brighton and Hove; and
- Some 41% of hackney respondents stated that they would leave the trade should the authority de-restrict.

10.6 Conclusions

10.6.1 The 2009 study has identified that there is NO evidence of significant unmet demand for hackney carriages in Brighton & Hove. This conclusion is based on an assessment of the implications of case law that has emerged since 2000, and the results of Halcrow's analysis.

10.6.2 On this basis the authority has discretion in its hackney licensing policy and may either:

- continue to limit the number of vehicles at 528 with additional wheelchair accessible licences issued annually as the authority sees fit;
- issue any number of additional plates as it sees fit, either in one allocation or a series of allocations; or
- remove the limit on the number of vehicles and allow a free entry policy.

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