

## Halcrow Group Limited

Arndale House Otley Road Headingley Leeds LS6 2UL  
Tel +44 (0)113 220 8220 Fax +44 (0)113 274 2924  
www.halcrow.com



## Technical note

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<b>Project</b>	Brighton and Hove Hackney Carriage Unmet Demand Study	<b>Date</b>	3 <sup>rd</sup> August 2009
<b>Note</b>	Consultation Technical Note	<b>Ref</b>	CTLCWH000
<b>Author</b>	Nikki Callaghan		

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### 1.1

#### Introduction

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.

### 1.2

#### Direct Consultation

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.

The comments received are detailed below.

#### Hackney Carriage Trade

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.

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.

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.

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.

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.

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.

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.

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.

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.

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

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.

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.

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.

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.

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.

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.

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.

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.

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

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.

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.

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.

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.

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.

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

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.

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.

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*

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

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.

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.

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.

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?

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.

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.

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.

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.

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.

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.

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

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.

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.

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.

### 1.3

#### **Indirect Consultation**

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.

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.

The comments received are outlined below.

#### Sussex Deaf Association

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.



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.

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

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.

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.

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.

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*

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.

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.

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 led to people being late for appointments but generally there are enough taxis.

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.

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.

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.

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.

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

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.

The representative commented that the best way to overcome 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

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

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.

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*

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.

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

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.

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.

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

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.

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

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.

