Brighton and Hove City Council
Survey of demand for hackney carriage services

September 2022

Executive Summary

This Survey of demand for hackney carriage services has been undertaken on behalf of Brighton and Hove following the guidance of the April 2010 DfT Best Practice Guidance document, and all relevant case history in regard to unmet demand. This Executive Summary draws together key points from the main report that are needed to allow a committee to determine from the facts presented their current position in regard to the policy of limiting hackney carriage vehicle licences according to Section 16 of the 1985 Transport Act. It is a summary of the main report which follows and should not be relied upon solely to justify any decisions of a committee but must be read in conjunction with the full report below.

This latest in the regular series of reviews of the level of unmet demand in the Brighton and Hove licensing area was undertaken between February and August 2022. This review has included a test of demand in Spring as well as the main test undertaken at the same time as in the previous survey and has specifically considered the policies of increasing WAV levels and managed plate growth in addition to the more usual standard brief.

The authority continues to support development of the licensed vehicle fleet as an important part of the transport offer of the area. The overall industry structure allows a lot of freedom in operating models but as a result is very complex. The present policies and procedures around the managed growth see the authority in an excellent position to react to growth or decline more appropriately than many other areas around the country.

Estimated weekly passenger demand at ranks continues to decline survey on survey. However, even with the pandemic the current picture suggests a slowing of the decline given there was 28% decline 2015 to 2018 and 25% in the four years to the latest survey. However, as before, the picture is of the larger ranks generally growing and smaller ones declining, with some notable exceptions. The impact of reduced national rail patronage remains noticeable at both stations.

The area continues to see rank activity at some location in nearly every hour of the week. The hackney carriage fleet continues to be active in plying for hire, often covering several quiet locations by passing by regularly. The changes in both demand and supply resulting from the ongoing 'churn' instigated by the pandemic, Brexit and current world political instability have led to unmet demand levels increasing despite falling overall demand.

One notable rank usage increase is at the Hospital rank.

Observed levels of service were found to be provided by around 45% of the fleet on the busiest, Saturday (actually a marginal increase from 2018). The same observations found 69% of observed licensed vehicles being local hackney carriages, 15% local private hire but 16% out of town vehicles. In 2018 75% were local hackney carriages.

A key value from the public interviews is that latent demand levels have reduced despite the increased levels of unmet demand. This, along with excellent reviews of elements of the service provided, suggests confidence in waiting at a rank or continuing to hail, is increased.

The trade remains very responsive to assisting the study, both from the individual and from the trade body / company levels. However, responses were dominated by concerns about the future of the industry and in particular concerns regarding the continued level of out of town operations very visible to them. However, there is some evidence from the public that their shift to app-based operations, particularly national ones, has reduced.

Levels of WAV activity remain higher at ranks than the actual proportion in the fleet. However, the level of observed wheel chair-based passengers remained similar to the levels in the last two surveys and relatively low. This is despite the area having unrivalled levels of WAV in both hackney carriage and private hire fleets for an area that retains a mixed vehicle fleet and does not have a mandatory policy.

The observed levels of unmet demand imply that the managed growth needs to continue at its present level to assist with the re-balancing of supply and demand that is still ongoing after the major shocks of the recent years to what was a well attuned operation.

There is strong need for the demand policy to be assisted by other elements of the authority with specific reference to ensuring zero tolerance of abuse of hackney carriage ranks which is a public safety concern and has an impact on the ability of the trade to adequately meet demand.

Soft elements of the licensed vehicle operation also need developing such as much stronger marketing of the Brighton and Hove licensed vehicle brand and increased focus on honest and open customer feedback and trade liaison in narrowing any gap between public expectation and trade delivery. A large number of good aspects of the present service need to be regularly put in the public domain whilst trade willingness to continually improve service needs to be both developed but also appreciated by those able to do so.

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1 General introduction and background

Brighton and Hove City Council is responsible for the licensing of hackney carriage and private hire vehicles operating within the Council area and is the licensing authority for this complete area. Further details of the local application of Section 16 of the 1985 Transport Act with regard to limiting hackney carriage vehicle numbers is provided in further Chapters of this report. Hackney carriage vehicle licences are the only part of licensing where such a stipulation occurs and there is no legal means by which either private hire vehicle numbers, private hire or hackney carriage driver numbers, or the number of private hire operators can be limited without revision to primary legislation.

This review of current policy is based on the Best Practice Guidance produced by the Department for Transport in April 2010 (BPG). It seeks to provide information to the licensing authority to meet section 16 of the Transport Act 1985 "that the grant of a hackney carriage vehicle licence may be refused if, but only if, the licensing authority is satisfied that there is no significant demand for the services of hackney carriages within its local area, which is unmet." This terminology is typically shortened to "no SUD".

Current hackney carriage, private hire and operator licensing is undertaken within the legal frameworks first set by the Town Polices Clause Act 1847. This has been amended and supplemented by various following legislation including the Transport Act 1985, Section 16 in regard to hackney carriage vehicle limits, and by the Local Government Miscellaneous Provisions Act 1976 with reference to private hire vehicles and operations. Many of the aspects of these laws have been tested and refined by other more recent legislation and more importantly through case law.

Beyond legislation, the experience of the person in the street tends to see both hackney carriage and private hire vehicles both as 'taxis' – a term we will try for the sake of clarity to use only in its generic sense within the report. We will use the term 'licensed vehicles' to refer to both hackney carriage and private hire.

The legislation around licensed vehicles and drivers has been the subject of many attempts at review. The limiting of hackney carriage vehicle numbers has been a particular concern as it is often considered to be a restrictive practice and against natural economic trends. The three most recent reviews were by the Office of Fair Trading in 2003, through the production of the BPG in 2010, and the Law Commission review which published its results in 2014. None of these resulted in any material change to the legislation involved in licensing.

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The upshot of all these reviews in respect of the principal subject of this survey is that local authorities retain the right to restrict the number of hackney carriage vehicle licenses. The Law Commission conclusion included retention of the power to limit hackney carriage vehicle numbers but utilizing a public interest test determined by the Secretary of State. It also suggested the three-year horizon also be used for rank reviews and accessibility reviews. However, there is currently no expected date either for publication of the Government response to the Law Commission, nor indeed any plans for revisions to legislation.

A more recent restriction, often applied to areas where there is no 'quantity' control felt to exist per-se, is that of 'quality control'. This is often a pseudonym for a restriction that any new hackney carriage vehicle licence must be for a wheel chair accessible vehicle, of various kinds as determined locally. In many places this implies a restricted number of saloon style hackney carriage licences are available, which often are given 'grandfather' rights to remain as saloon style.

Within this quality restriction, there are various levels of strength of the types of vehicles allowed. The tightest restriction, now only retained by a few authorities only allows 'London' style wheel chair accessible vehicles, restricted to those with a 25-foot turning circle, and at the present time principally the LTI Tx, the Mercedes Vito special edition with steerable rear axle, and the Metrocab (no longer produced). Others allow a wider range of van style conversions in their wheel chair accessible fleet, whilst some go as far as also allowing rear-loading conversions. Given the additional price of these vehicles, this often implies a restriction on entry to the hackney carriage trade.

Some authorities do not allow vehicles which appear to be hackney carriage, i.e. mainly the London style vehicles, to be within the private hire fleet, whilst others do allow wheel chair vehicles. The most usual method of distinguishing between hackney carriages and private hire is a 'Taxi' roof sign on the vehicle, although again some areas do allow roof signs on private hire as long as they do not say 'Taxi', some turn those signs at right angles, whilst others apply liveries, mainly to hackney carriage fleets, but sometimes also to private hire fleets.

The current Brighton policy provides a 'mixed' hackney carriage vehicle fleet containing a good proportion of both fully wheel chair accessible vehicles of a range of styles as well as saloon vehicles. The fleet is also relatively highly related to company operations as well as the traditional owner-driver hackney carriage operator. Many hackney carriages are therefore also available by telephone links.

Testing for unmet demand

After introduction of the 1985 Transport Act, Leeds University Institute for Transport Studies developed a tool by which the level of 'unmet demand' could be evaluated and a determination made if this was significant or not. The tool was taken forward and developed as more studies were undertaken. Over time this 'index of significance of unmet demand' (ISUD) became accepted as an industry standard tool to be used for this purpose. Some revisions have been made following the few but specific court cases where various parties have challenged the policy of retaining a limit.

Some of the application has differed between Scottish and English authority's. This is mainly due to some court cases in Scotland taking interpretation of the duty of the licensing authority further than is usual in England and Wales, requiring current knowledge of the status of unmet demand at all times, rather than just at the snap-shot taken every three years.

The DfT asked in writing in 2004 for all licensing authorities with quantity restrictions to review them, publish their justification by March 2005, and then review at least every three years since then. In due course, this led to a summary of the government guidance which was last updated in England and Wales in 2010 (but more recently in Scotland). During the pandemic the DfT suggested that the three year period could be relaxed to avoid obtaining information which was too severely skewed but did not provide any rationale or explanation of this guidance.

The BPG in 2010 also provided additional suggestions of how these surveys should be undertaken, albeit in general but fairly extensive terms. A key encouragement within the BPG is that "an interval of three years is commonly regarded as the maximum reasonable period between surveys". BPG suggests key points in consideration are passenger waiting times at ranks, for street hailings and telephone bookings, latent and peaked demand, wide consultation and publication of "all the evidence gathered".

The most recent changes in legislation regarding licensed vehicles have been enactment of the parts of the Equality Act related to guidance dogs (sections 168 to 171, enacted in October 2010), the two clauses of the Deregulation Act which were successful in proceeding, relating to length of period each license covers and to allowing operators to transfer work across borders (enacted in October 2015), and most recently enactment of Sections 165 and 167 of the Equality Act, albeit on a permissive basis (see below). 2022 also saw two further Acts added to Royal Assent – the "Taxis and Private Hire Vehicles (Safeguarding and Road Safety Act) (31 March 2022)" and the "Taxis and Private Hire Vehicles (Disabled Persons) (28 June 2022)".

In November 2016, the DfT undertook a consultation regarding enacting Sections 167 and 165 of the Equality Act. These allow for all vehicles capable of carrying a wheel chair to be placed on a list by the local council (section 167). Any driver using a vehicle on this list then has a duty under section 165 to:

- Carry the passenger while in the wheel chair
- Not make any additional charge for doing so
- If the passenger chooses to sit in a passenger seat to carry the wheel chair
- To take such steps as are necessary to ensure that the passenger is carried in safety and reasonable comfort
- To give the passenger such mobility assistance as is reasonably required

This was enacted from April 2017.

The two new 2022 Acts make small but significant changes. The first makes it mandatory for any licensing authority in England that has information about a taxi or phv driver licensed by another authority that is relevant to safeguarding or road safety concerns in its area to share that information with the authority that issued that drivers licence, whilst the second amends the Equality Act to place duties on taxi and phv drivers and operators such that any disabled person has specific rights and protections to be transported and receive assistance when using a taxi or phv without being charged extra.

Unmet Demand Case History

In respect to case law impinging on unmet demand, the two most recent cases were in 1987 and 2002. The first case (R v Great Yarmouth) concluded authorities must consider the view of significant unmet demand as a whole, not condescending to detailed consideration of the position in every limited area, i.e. to consider significance of unmet demand over the area as a whole.

R v Castle Point considered the issue of latent, or preferably termed, suppressed demand consideration. This clarified that this element relates only to the element which is measurable. Measurable suppressed demand includes inappropriately met demand (taken by private hire vehicles in situations legally hackney carriage opportunities) or those forced to use less satisfactory methods to get home (principally walking, i.e. those observed to walk away from rank locations).

In general, industry standards suggest that the determination of conclusions about significance of unmet demand must take into account the practicability of improving the standard of service through the increase of supply of vehicles. It is also important to have consistent treatment of authorities as well as for the same authority over time, although apart from the general guidance of the BPG there is no clear stipulations as to what this means in reality.

Deliberation of overall taxi policy

During September 2018 the All-Party Parliamentary Group on taxis produced its long-awaited Final Report. There was a generally accepted call for revision to taxi licensing legislation and practice, including encouragement for local authorities to move towards some of the practical suggestions made within the Report. However, the Report has no legislative backing and the key conclusion was that the Government needed to act firstly to revise the 2010 BPG but then to move to revisions to primary legislation as soon as practicable. Despite some opposition from members of the group, the right to retain limits on hackney carriage vehicle numbers was supported, with many also supporting adding a tool which would allow private hire numbers to be limited where appropriate, given reasonable explanation of the expected public interest gains.

During the early part of 2022, the Department for Transport opened a consultation on revising the remainder of the Best Practice Guidance 2010 not amended by the issue of the "Statutory Taxi and Private Hire Vehicle Standards" (STPHVS) in July 2020. This consultation ran through April, May and June 2022 but has not yet seen any response from the DfT. It included suggestion of need for rank review and accessibility review on a similar three-year time frame to that retained for demand surveys. However, apart from general comments again discouraging regulation, no change to the requirements for or regarding unmet demand studies was envisaged.

Conclusion to chapter

In conclusion, the present legislation in England and Wales sees public fare-paying passenger carrying vehicles firstly split by passenger capacity. All vehicles able to carry nine or more passengers are dealt with under national public service vehicle licensing. Local licensing authorities only have jurisdiction over vehicles carrying eight or less passengers.

These are split between hackney carriages which are alone able to wait at ranks or pick up people in the streets without a booking, and private hire who can only be used with a booking made through an operator. If any passenger uses a private hire vehicle without such a properly made booking, they are not generally considered to be insured for their journey.

Drivers can either be split between ability to drive either hackney carriage or private hire, or be 'dual', allowed to drive either kind of vehicle (or in some cases a mixed set of conditions, e.g. hackney carriage drivers being able to drive either whilst private hire cannot drive hackney carriage). Whilst a private hire driver can only take bookings via an operator, with the 'triple-lock' applying that the vehicle, driver and operator must all be with the same authority, a hackney carriage driver can accept bookings on-street or by phone without the same stipulation required for private hire.

For Brighton and Hove, drivers can choose either to have a private hire only driving licence or one that allows them to drive both hackney carriage and private hire (although not termed a dual licence per se). This structure mirrors the vehicle in that a hackney carriage can be used for bookings whereas private hire can only be hired with a pre-booking.

Recent legislation needing clarification has some operators believing they can use vehicles from any authority as long as they are legally licensed as private hire. At first, under the 'Stockton' case, this was hackney carriages operating as private hire in other areas (cross-border hiring). More recently, under the Deregulation Act, private hire companies are able to subcontract bookings to other companies in other areas if they are unable to fulfil their booking, but the interpretation of this has become quite wide.

The 'triple lock' licensing rule has also become accepted. A vehicle, driver and operator must all be under the same licensing authority to provide full protection to the passenger. However, it is also accepted that a customer can call any private hire company anywhere to provide their transport although many would not realise that if there was an issue it would be hard for a local authority to follow this up unless the triple lock was in place by the vehicle used and was for the area the customer contacted licensing.

Further, introduction of recent methods of obtaining vehicles, principally using 'apps' on mobile phones have also led to confusion as to how 'apps' usage sits with present legislation. This continues to be debated with the key issue being if obtaining a vehicle using an app (most of which rely on proximity to choose a vehicle) is a pre-booking or not, given the often minimal time between the person making known their need on the app and a vehicle meeting that need.

There is also strong current pressure on licensing authorities to work with the environmental sections of their authorities in order to assist in the reduction of vehicle emission issues within Government guidelines.

Whilst there are a number of authorities now mandated to introduce Clean Air Zones, other authorities presently do not have such stipulation although there remains strong pressure on health grounds to take action. Given that many hackney carriages, and particularly the larger ones including those that are wheelchair accessible, were encouraged to use diesel vehicles, which are now seen as the more critical contributors to the worst elements of air pollution, often there is strong pressure to see reduced emissions from the overall licensed vehicle fleet. A Greater-Manchester wide review of clean air is currently on hold, pending agreement of a new Direction by Government and it appears that other clean air developments are also being put back.

All these matters can impact on hackney carriage services, their usage, and therefore on unmet demand and its significance.

Coronavirus

The serious Covid-19 virus took hold in the UK during March 2020. Whilst life carried on almost as normal until mid-March, formal lockdown was applied from Tuesday 24th March 2020 until further notice. Significant reductions in movement had begun to bite from the previous week. The last dates in 2020 when on-street and rank surveys occurred were effectively Sunday 16th March 2020.

The lockdown began to be eased on 13th May 2020 with people encouraged to return to work if they were not able to work from home. Restrictions on outdoor exercise, golf courses, tennis courses and socialising at distance, with restart of construction also allowed. From 15th June, bars, restaurants and hairdressers were allowed to return to a 'new normal'. The next wave of easement occurred on 4th July 2020.

However, a range of different re-restrictions were applied in various locations as cases began to rise again. Schools were re-opened in September, but a new 'rule of six' was introduced shortly after reducing the ability of people to socialise as rates of infection rose again, together with a 22:00 close time for all hospitality venues. In general, new restrictions tended to be introduced with a few days lead in but this ended with a new lockdown from Thursday 5th November ending on Wednesday 2nd December that year.

After that, new Tiers were introduced and then again another national lockdown from early January 2021 but with the start of vaccinations providing some hope of an eventual overcoming of the impacts of the virus.

As levels of vaccination increased and infection / hospitalisations and deaths reduced, a new road out of lockdown was announced and implemented. The final stage, removal of most English restrictions, was delayed about a month but was finally instigated towards the end of July 2021. The Government focus has since then been on 'coping with the virus' although as Winter has progressed infection levels have tended to move upwards.

Later in Winter 2021 appearance of a new variant led to further concern and encouragement to partake in a booster vaccination programme as well as taking further care about interaction. Mask wearing was returned to being a legal requirement at the start of December 2021 in many, but not all of the previous circumstances. The situation around Christmas 2021 was very tense. Working from home was reinstated towards the end of 2021.

Early 2021 saw more confidence that the 'omicron wave' could be survived although in early January there was pressure on many industries arising from staff isolating. Various methods were being considered to minimise the impact of need to self-isolate. By the end of February all legal restrictions in England were removed with the focus clearly moving to 'living with the virus' although unintended consequences of rising fuel and other prices from the reopening of the economy were also exacerbated by the current issue of the Ukraine occupation. At the time of writing this report (early September 2022) there was a high level of infection but the link between infection and serious illness appeared to have been broken, although the need to keep levels of immunity to severe disease may well lead to further immunisation as time proceeds. Another booster injection was starting to be rolled out.

Overall, the pandemic led to a significant period of lack of business for both hackney carriage and private hire vehicles, in various ways as the pandemic developed. Some of the impacts of this are discussed in public and driver attitude chapters below, as well as review of impact on demand in the rank chapter. More significant was the reappraisal of many as to their involvement with the industry, and the general job market churn that was instigated not just in the taxi arena. In many areas there is clear knowledge that many who planned to retire brought that date forward whilst others found that the certainty of income from delivery driving was preferable to the vagaries of taxi passenger demand. Yet others found the shortage of private hire drivers meant more requirement on hackney carriages in the daytime, in turn meaning they could earn more in the week, and not be reliant on servicing less-preferable customers in the early hours of Saturday and Sunday.

A further issue we have observed is that even pubs, restaurants and night venues are now reducing their opening hours or days in reaction to rising costs and staff shortages. This can lead to taxi demand in an area becoming peaky or peakier with such change.

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Further, the impacts of the developing war in Ukraine and other economic changes partly arising from Brexit is again putting pressure on costs of providing licensed vehicle services. Rising fuel prices have also added to the issues. The days when the main aim of a demand survey was checking if passenger demand had changed to see if supply remained sufficient have now been replaced by a much wider research need to identify both demand and supply side changes. Even long-standing areas with limited hackney carriage vehicle numbers have been impacted by having spare hackney carriage vehicle licences available for the first time in decades.

2 Local background and context

Key dates for this Survey of demand for hackney carriage services for Brighton and Hove are:

- appointed LVSA in November 2021
- in accordance with our proposal of October 2021
- as confirmed during the inception meeting for the survey held on 16th November 2021
- this survey was carried out between December 2021 and September 2022 (to allow for extended public consultation)
- On street pedestrian survey work occurred in July / August 2022
- the video rank observations occurred in March and May 2022
- Licensed vehicle driver opinions and operating practices were canvassed by discussion with trade representatives (and an invite to all trade groups to provide input), and an all-driver questionnaire issued by the Council in paper format but returned to us either in paper or by use of an on-line portal (done well in advance of the main rank survey to allow revision of rank coverage if necessary)
- Key stakeholders were consulted throughout the period of the survey
- A much more detailed WAV-user survey (as already used for several other authorities recently) was circulated by council representatives in July and reiterated in late August)
- A draft of this Final Report was reviewed by the client during September 2022
- and reported to the appropriate Council committee following acceptance of the full Report.

For the sake of clarity, it should be noted that LVSA – Licensed Vehicle Surveys and Assessment is a joint trading name for CTS Traffic and Transportation Ltd (CTS) and Vector Transport Consultancy, a name used since early 2017. The 2015 survey was undertaken by the same Project Manager as this study, but with CTS working as sub-contractors to Peter Brett and Associates (PBA) due to contractual arrangements by the Council at that time. The 2018 survey was undertaken directly by CTS alongside rebuttals for a challenge of the limit policy. The 2022 survey was delayed a year from the usual three-year Best Practice Guidance horizon to allow for settling down after the worst ravages of the pandemic.

Brighton and Hove City Council is a unitary authority formed in 1997 and granted City status in 2001. It is within the former East Sussex county area of Southern England. The authority has a current population of 277,200 from the initial results of the 2021 census (raw 2021 values).

This is lower than the 296,729 estimate for 2021 based on 2011, the 291,200 using the 2018 estimates currently available from the 2011 census and the 281,100 quoted during the 2015 survey. It is not clear why this fall in population has been recorded.

In terms of background council policy, Brighton and Hove City Council, with its unitary status has full control over background planning, transport and highway policy and activities. This means the council retains full control over provision of ranks, albeit within the highways section of the Council.

The LTP adopted by the City in March 2015, known as LTP4, remains current, as it was in 2015/2018, providing a long-term strategy for delivering transport improvements ahead to 2030. At this time, the fifth LTP (LTP5) is being developed but not yet approved. Consultation on LTP5 was undertaken in Autumn 2021 but there is no reference to when the document will be formally taken on board.

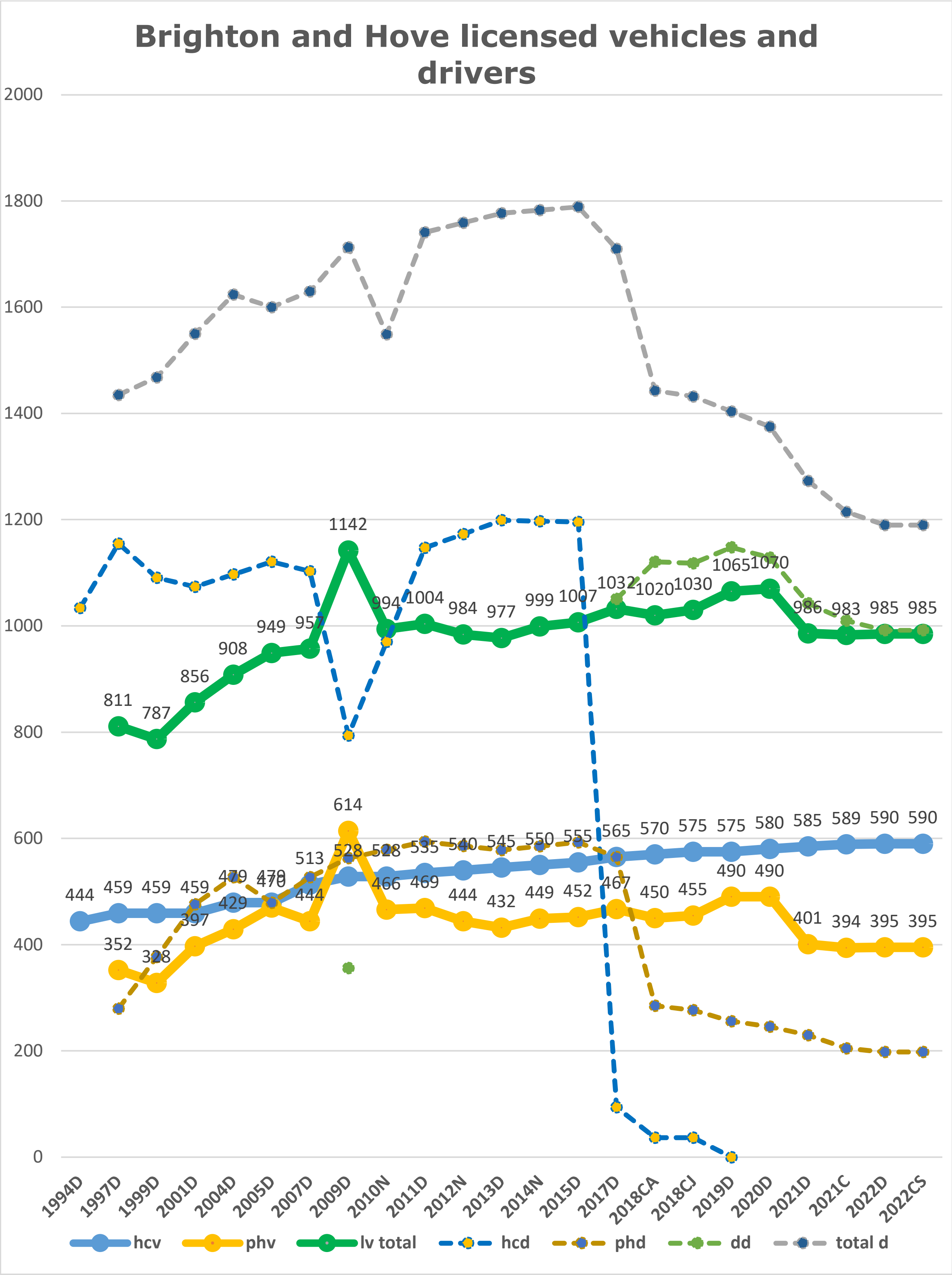
The preparatory surveys for LTP4 sought identification of aspects important to people. 2.4% of respondents said that local taxis were the most important service to them. Less than 1% suggested they were most in need of improvement, suggesting a valued and appreciated service. During the course of this survey no evidence has been found to doubt this conclusion.

The City considers taxi ranks as one of a number of key vehicle/people interchanges which need investment to enhance neighbourhoods and destinations for people for whom there are key delivery programmes.

The LTP4 reference pages have a taxi link which points the reader to the main Council taxi website and the various documents allied to that operation. This includes reference to the Hackney Carriage Accessibility Policy as well as other information pages about the full licensed vehicle operations of the Council.

Brighton and Hove City has full powers over licensing the vehicles, drivers and operators serving people within their area. Brighton and Hove Council has chosen to utilize its power to limit hackney carriage vehicle numbers, and as far as we are aware has done so since 1986. It is one of the most rigorous councils with respect to undertaking reviews of its unmet demand policy, with previous tests undertaken and available from 2018 right back to 2003.

By drawing together published statistics from both the Department for Transport (D) and the National Private Hire Association (N), supplemented by private information from the licensing authority records (C), recent trends in vehicle, driver and operator numbers can be observed. The detailed numbers supporting the picture below are provided in Appendix 1. Due to the comparative size, the operator figures are shown in the second picture. The current managed growth policy sees five extra hackney carriage licences issued each year, with the latest tranche apparently taking longer to be added to the fleet than in previous years.



Licensing Statistics from 1994 to date

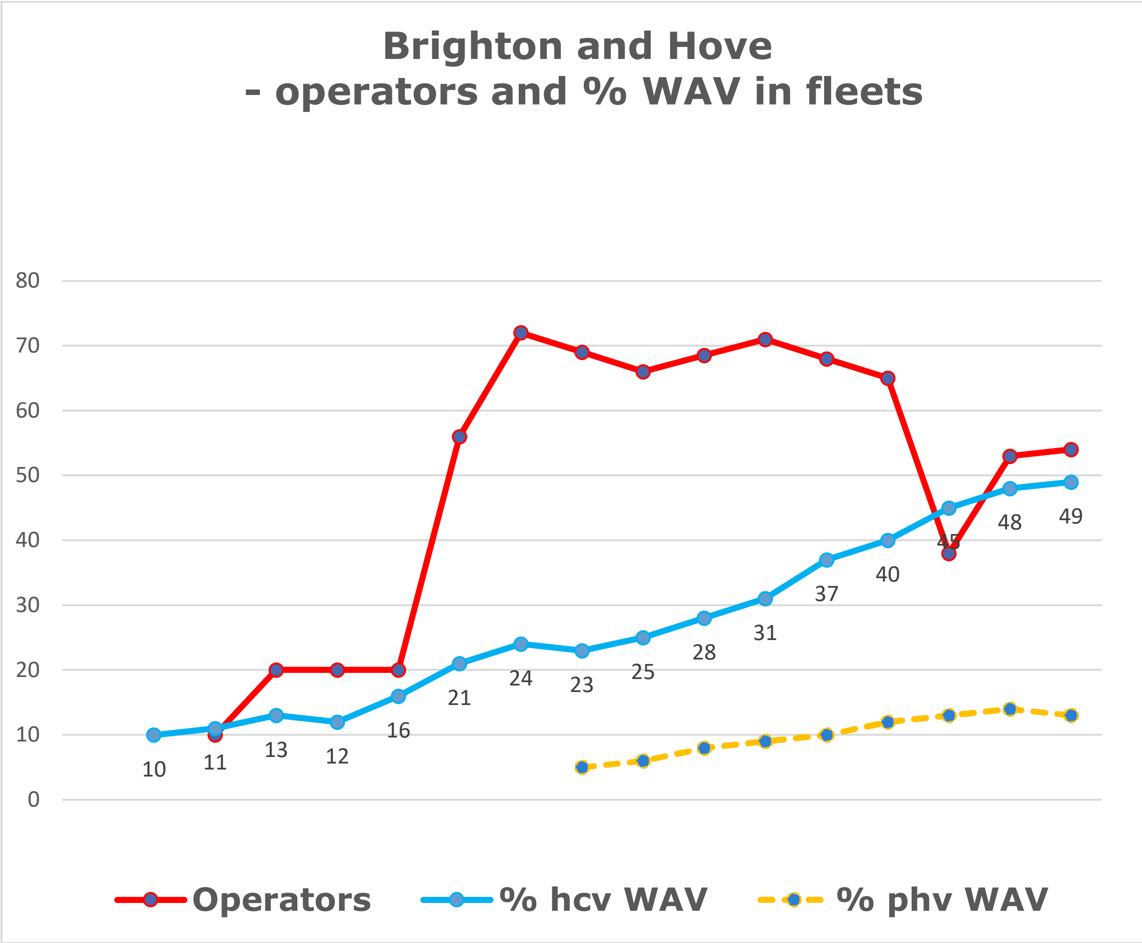
The graph demonstrates the steady growth of hackney carriage vehicle numbers under the managed growth policy. This has seen an increase in the fleet of some 29% from 1997 to date. During that same period, private hire vehicle numbers, which cannot be limited and in theory should represent the market have grown 12%, although they did have a possible peak much higher in 2009, although that might be a statistical error (but that had seen 74% growth, the next highest value reached, in 2019 saw 39%). Private hire vehicle numbers had grown since the last survey, but then fell back with pandemic impacts, but have more recently remained stable. However, their numbers are now very similar to the level in 2001 meaning hackney carriages are now 60% of the total Brighton and Hove licensed vehicle fleet.

However, it is also true that a good number of private hire vehicles operating in the area actually are vehicles and drivers from other areas, some working on app circuits but others where the local operator also has a base in the other area and uses its total fleet to service their total operating area. There is no easy way to identify this style of operation given that some trips made by these vehicles may be legitimate given the wide geographic impact the City has.

The major change since 2015 has been the introduction of dual licensing for drivers of vehicles. This is shown by the graph with sharp drops for the single options but with the overall impact being a drop in the total number on issue as duplication has now generally been removed. This therefore gives a much better reflection of the actual number of people available to drive the vehicles, since before there could be people with two licences, who of course could not drive both vehicles at the same time. This change is now complete with no hackney carriage only driver licences left on issue (since just after the last survey in late 2018).

Information is also available from these sources to show how the level of wheel chair accessible vehicles (WAV) has varied. It must be noted that in most cases the values for the private hire side tend to be much more approximate than those on the hackney carriage side, as there is no option to mandate for private hire being wheel chair accessible.

In some areas, to strengthen the ability of the public to differentiate between the two parts of the licensed vehicle trade, licensing authorities might not allow any WAV in the private hire fleet at all. Many authorities with fully wheel chair accessible vehicles in the hackney carriage fleet either do not have any such vehicles in the private hire fleet, or do not record them, even if they are allowed. This is not the case for Brighton and Hove whose records of WAV on both sides of the trade are accurate.



Operator numbers and levels of WAV provision in the fleet

The graph above demonstrates a steady decline in the proportion of the hackney carriage fleet that are fully wheel chair accessible since the peak of 51% shown in the 2020 values. However, given the numerical growth in plates the actual number of such vehicles has not changed much, being 290 at the time of the DfT survey of March 2022. Further information about how this fits with national information is provided below.

Comparison of levels of WAV with national information

The DfT statistics provide as consistent as possible information about the number of WAV style vehicles in both hackney carriage and private hire fleets across England and Wales. Information from the latest available survey (end of March 2022) was obtained for the following authorities and compared to the available information for Brighton and Hove:

- Liverpool
- Manchester
- Plymouth
- Newcastle upon Tune
- Bristol
- Blackpool
- Cheltenham
- Oxford
- Southend on Sea
- Portsmouth
- Southampton
- Eastbourne
- Bournemouth Christchurch Poole

Both the numbers of vehicles and the proportion to each 1,000 persons (using information from the latest initial 2021 census population values) were compared. These statistics show that Brighton and Hove licensing area at the end of March 2022 had one wheel chair accessible hackney carriage for each 1,000 persons (total) in the authority area. Of the 14 total authorities compared, as agreed with the Council, only three others had higher levels of hackney carriage WAV, Liverpool (2.9), Manchester (2.0) and Plymouth (1.1) being the only ones higher. The average English level was 0.6 wheel chair accessible vehicles per thousand population. There were ten others whose level of wheel chair accessible (WA) hackney carriages was less – ranging from 0.9 WA hackney carriages per thousand for both Newcastle upon Tyne and Bristol to 0.2 for Eastbourne and the recent Bournemouth, Christchurch Poole combined authority. It is interesting that in this comparison, Brighton and Hove is the highest ranked authority that has a mixed vehicle style hackney carriage fleet, the three above all having 100% WA hackney carriage fleets (as does Bristol).

The regular result of high levels of WA vehicles in the hackney carriage fleet can be none in the private hire sector. Liverpool, Plymouth , Newcastle upon Tyne and Bristol for example all have very low levels of private hire WA, which can be an issue if few hackney carriages ally to private hire booking circuits, significant as many people needing adapted vehicles tend to phone to book them.

In the list compared, Brighton and Hove has the highest level of private hire WA at 0.32 per thousand population; four times the English average of 0.08 and eight times the values for Liverpool and Plymouth. The next highest value in the list of 14 compared is Manchester with 0.15.

This all suggests that Brighton and Hove is well-ahead of other authorities both in its current provision of WA hackney carriages and private hire vehicles, which suggests per se those needing such vehicles in the area should have a better than average provision. In fact, the private hire levels of WA move Brighton to third in the quoted list in terms of overall provision of WA in the total licensed vehicle fleet (1.4 WA per thousand population).

However, the total level of licensed vehicles per thousand population for Brighton and Hove is 3.6 vehicles, lower than the English average of 4.6 vehicles. This places Brighton and Hove 9th equal in overall provision. Newcastle upon Tyne has the highest level of licensed vehicle provision overall, with some 9.2 vehicles. Manchester is second with 7.3 and Liverpool third with 6.3. All these retain limits on hackney carriage vehicle numbers, with only Eastbourne having a higher level overall not having a limit in those authorities with better provision than Brighton and Hove.

Review of limit policy

Brighton and Hove undertake regular review of its policy to limit hackney carriage vehicle numbers in line with the BPG. The previous surveys were in 2018, 2015, 2012, 2009, 2006 and 2003, one of the best and most rigorous reviews of policy across English licensing areas. This rigour is enhanced by the fact that all of these reports remain available so that evidence of why the limit was retained is fully available to all for their scrutiny and understanding.

Current fleet structure

Whilst generally the overall structure of the local licensing industry is fairly straight forward, the actual number of specific restrictions on activity are kept to a reasonable minimum to allow flexibility of business models for those in the licensed vehicle trade. This, however, does lead to significantly complex overall structures within the Brighton and Hove City operation. This section has used the current driver, vehicle and operator statistics to seek to identify present structures, partly to understand the levels of sharing of vehicles.

Brighton and Hove policy provides a mixed hackney carriage vehicle fleet, with both saloon and WAV style vehicles allowed. A wide range of WAV styles are allowed, including some rear loading vehicles. Further, there are no restrictions on the number of vehicles a person or company can own. Since the last survey all hackney carriage driver licences have become effectively dual, whilst some retain a pure private hire driver licence that only allows them to drive private hire vehicles.

The key reason for including this analysis in this report is that drivers without their own vehicle can often be a high-pressure point for wanting their own vehicle, which can put pressure on plates where there is a limit policy. This may not relate to classic unmet demand, but more a wish for a person to be able to avoid rental fees (but these are replaced by having to take on the full costs of vehicle ownership, which are not trivial). It can, however, be purported as a reason to remove hackney carriage vehicle limits. It is also important to understand the level of vehicles available to those without their own vehicle, and to understand how many hackney carriage drivers are pure single vehicle owner-drivers.

The database used from early December 2021 showed the following (compared where relevant to July 2018 analysis):

- 1,010 hackney carriage driver licences also allowing driving of private hire vehicles, compared to 1,117 dual drivers in 2018
- (The 2018 number of 38 hackney only drivers category no longer exists)
- 205 private hire drivers (down from 286 in 2018)
- 589 hackney carriage vehicles with 511 owners (no. of vehicles increased from 575 in line with managed growth, number of owners reduced from 516 in 2018)
- 394 private hire vehicles with 372 owners (reduced from 452 and 424 respectively in 2018)
- 15 operators with three or more vehicles (up from 9 in 2018)
- A much reduced number of 40 operators with just one or two vehicles (was 65-75 in 2018)
- 57 hackney carriage owners with more than one vehicle (largest three have five vehicles)
- 18 private hire vehicle owners with more than one vehicle (one has nine, one 5 and the remainder three or two vehicles).

As already mooted above, the current English licensed vehicle trade operates under a wide range of business models. Brighton and Hove City seeks to provide freedom to as many of these models as possible although other licensing areas may not be so tolerant, for various reasons. The range includes:

- Single owner/driver hackney carriage operations
- Some of whom operate for companies or groups or use apps
- Single owner/driver private hire operations who also must have an operator licence
- Small companies who may or may not own vehicles
- Larger companies who may or may not own vehicles, or may have a mix, or may operate as a co-operative of owner/drivers

At the present time in Brighton and Hove City our evaluation of the database suggests some 1,380 different people (or companies) with licences in Brighton and Hove related to the licensed vehicle industry (numbers in brackets are from the 2018 analysis):

- 348 people with hackney carriage vehicles and dual driver badges (353)
- 131 people with private hire vehicles and private hire driver badges (172)
- 176 people with private hire vehicles and dual driver badges (137)
- 17 people with a private hire vehicle, a private hire drivers' badge and an operator licence, one of whom has a larger operator licence (21)
- 446 dual drivers without vehicles (578)
- 54 private hire drivers without vehicles (63)
- A range of other mixtures of ownership, driver and operator groupings
- (the category of hackney carriage vehicle and hackney carriage driver badge which had nine in 2018 no longer exists, there were 20 hackney carriage drivers without vehicles in 2018, another category that no longer exists)

There are on paper 78 (was 59 in 2018) hackney carriages and 22 (was 28) private hire vehicles in multiple ownership (additional to allowing one vehicle each that they drive), and therefore clearly available for rent as no-one can physically drive two vehicles at the same time (although some people may own two vehicles to use at different times for different purposes).

However, there are around a total of 217 hackney carriages (150 in 2018) and 41 private hire (115) owned by people who do not have their own driver licence. Further, any vehicle already owned and driven can also be made available for others to drive.

This should imply more than enough choice for people wishing to drive a vehicle owned by someone else. Our figures suggest there are in the order of 503 drivers (a big drop from the 660 of 2018) who have a licence to drive but who do not own their own vehicle, although this may include some people who only drive occasionally, such as business owners who like to retain flexibility, or people who have left the trade but have not cancelled their licence.

Plate issues

At the present time, Brighton and Hove retains its managed growth policy. This means there is an established principle for issue of these plates (and an associated waiting list). For the sake of clarity, the outlines of this are provided below.

The waiting list criteria and procedure document was last reviewed in April 2002. It is an annual list requiring application during the month of March for each effective year running from 1st May to 30th April. The draft list is published in April for people to review. The principal criteria is a person must have held a Brighton and Hove driver licence. Each application each year will be counted as one credit, such that those having applied for longest will have generally the highest number of credits. Offer of plates is made to those with the most credits with a ballot undertaken if there are more with the highest number of credits than the licences on offer.

If offers are not accepted, the offers proceed down the list to the next highest. Each driver has two weeks to accept the offer and reasonable time then to licence a vehicle. At present this appears to take around two months from offer to plate issue.

Further discussion of these figures occurs in the synthesis section of the report.

3 Patent demand measurement (rank surveys)

As already recorded in Chapter 2, control of provision of on-street ranks in Brighton and Hove is in the control of the highway section of the City Council itself, which should maximise flexibility in change, although in actuality being part of a different part of the Council may still leave issues in getting new ranks, particularly as the highway section has the responsibility to oversee the full transport requirements of the City.

With reference to rank provision, discussions were held with the licensing section, internet checks were made and the all-driver survey reviewed to identify the current active ranks, and to select a suitable sample for the review of unmet demand and its significance. Our methodology involves a current review both in advance of submitting our proposal to undertake this Survey and at the study inception meeting, together with site visits where considered necessary. This provides a valid and appropriate sample of rank coverage which is important to feed the numeric evaluation of the level of unmet demand, and its significance (see discussion in Chapter 7).

Further, for this study, an initial review was undertaken at the two busiest local authority ranks to test if there was any suggestion that levels of unmet demand might have become significant since the previous survey. This excluded the station rank which needs a separate permit as any unmet demand there cannot be easily influenced by the council adding new licences due to the additional restrictions and cost. The rationale was that the two busiest ranks would be the most likely places that unmet demand might be observed. The comparison also covered the two busiest 24-hour periods expected, i.e. from early Friday morning through to early Sunday morning. For 2022, East Street was included as before, but the second rank chosen was West Street due to the changes to the St Peter's rank that had occurred since 2018 and an initial view that usage of that location may have fallen.

In terms of revisions to rank provision since the last survey, the St Peter's Place rank has moved from the location on the gyratory to the north to a purpose-built separated area on the A23 Gloucester Place immediately adjacent to St Peter's Church and much more accessible by pedestrians from the nearby shopping area on the western side of the A23.

Further, the private Station rank is now located at the southern end of Stroudley Road, still requiring a private permit, and out from the previous location inside the station roof accessed off Queens Road. This change was undertaken to provide extra pedestrian circulation space for passengers on the main route from the station southwards to central Brighton.

When rail replacement bus services operate, the rank is moved into the bottom end of the adjacent station car park given that buses need a much larger turning circle than hackney carriages. This location is also the point that most private hire and private vehicles pick up.

Initial rank activity test

This initial test, undertaken during March 2022, found expected weekly estimated weekly flows which were 16% less at the busiest location. During the 119 hours covered over the two sites, just four hours had an average passenger delay in the hour over a minute. Overall, just 0.29% of passengers experienced a wait, with overall average passenger delay at these two sites over the two days of just two seconds. Overall, this suggested any propensity towards unmet demand being significant in the area was very likely to have reduced, and also provided suggestion that hackney carriage demand overall would be reduced in this survey.

However, more detailed comparison at East Street showed that whilst Friday 24-hour flows (covering 07:00 Friday to 06:59 Saturday) had reduced 9%, Saturday equivalents were actually up 81%. The weekly reduction estimates uses five times the Friday value hence the overall reduction. This suggests that demand for hackney carriages in the area may have trended towards being more peaky in 2022 than in 2018. This is further tested and discussed below.

Full rank surveys

The full rank survey work was undertaken at a similar time to the previous survey, during May 2022. An agreed set of observations were undertaken, although to add comfort additional observations were undertaken at sites on a 'quick watch' basis with some of those hours having passenger data included into the evaluation to ensure the results were even more robust.

The table below presents the 2022 results and compares them to available information from previous surveys.

Rank	Passengers per week, 2022 urvey		Passengers per week, 2018 survey	% of total demand at location, 2018	Passengers per week, 2015 survey	% of total demand at location	Passengers per week 2012 survey
East Street	12,687	43	10,722	27	14,696	27	6,043 (16)
Station (private)	6,114	20	14,872	37	21,915	40	15,115 (41)
Queen Square	2,737	9	2,644	7	2,595	5	2,777 (7)
West Street	2,221	7	1,800	5	2,710	5	3,370 (9)
Hove Station	1,888	6	2,143	5	1,717	3	2,093 (6)
Paston Place	1,548	5	438	1.1	1,402	2.5	1,090 (3)
St Peter's Place	1,025	3	3,760	9	4,093	7.5	1,957 (5)
Norton Road	Not included		1,321	3	1,460	2.5	1,202 (3)
Church Street (informal) / Mash Tun (2022)	729	2	1,085	3	2,626	5	n/a
Blatchington Road	283	0.9	Not included				
Old Ship	271	0.8	398	1	445	0.8	2,254 (6)
Brunswick Place	216	0.7	432	1.1	469	0.9	692 (2)
Palmeira Sq (Church Road)	131	0.2	330	0.8	450	0.8	451 (1)
Elm Grove	Not included		4	0.0	22	0.0	27 (0.0)
Goldstone Villas	Not included		n/a		n/a		145 (0.0)
Total	***29,849***		***39,949***		***54,600***		
Growth from 2018	***-25%***						
Comparison to previous surveys							
	From 2015	***From 2012***	***From 2006***	***From 2003***			
2022	***-45%***	***-20%***	***-35%***	***-20%***			***29,849***
2018	***-27%***			***+7%***			***39,949***
2015				***+46%***	***+47%***		***54,600***
2012				***-1%***	***-29%***		***37,216***
2009				***+40%***	***+13%***		***52,542***
2006					***+23%***		***46,308***
2003							***37,500***

The key result from this table suggests a clear reduction in usage of hackney carriages at ranks of some 25% since the last survey in 2018 (27% for 2018 from 2015). This takes observed usage levels to their lowest level ever recorded. Interestingly, the survey on survey decline since 2015 has been very similar between the last two surveys. This sees the golden survey in demand terms as that undertaken in 2015.

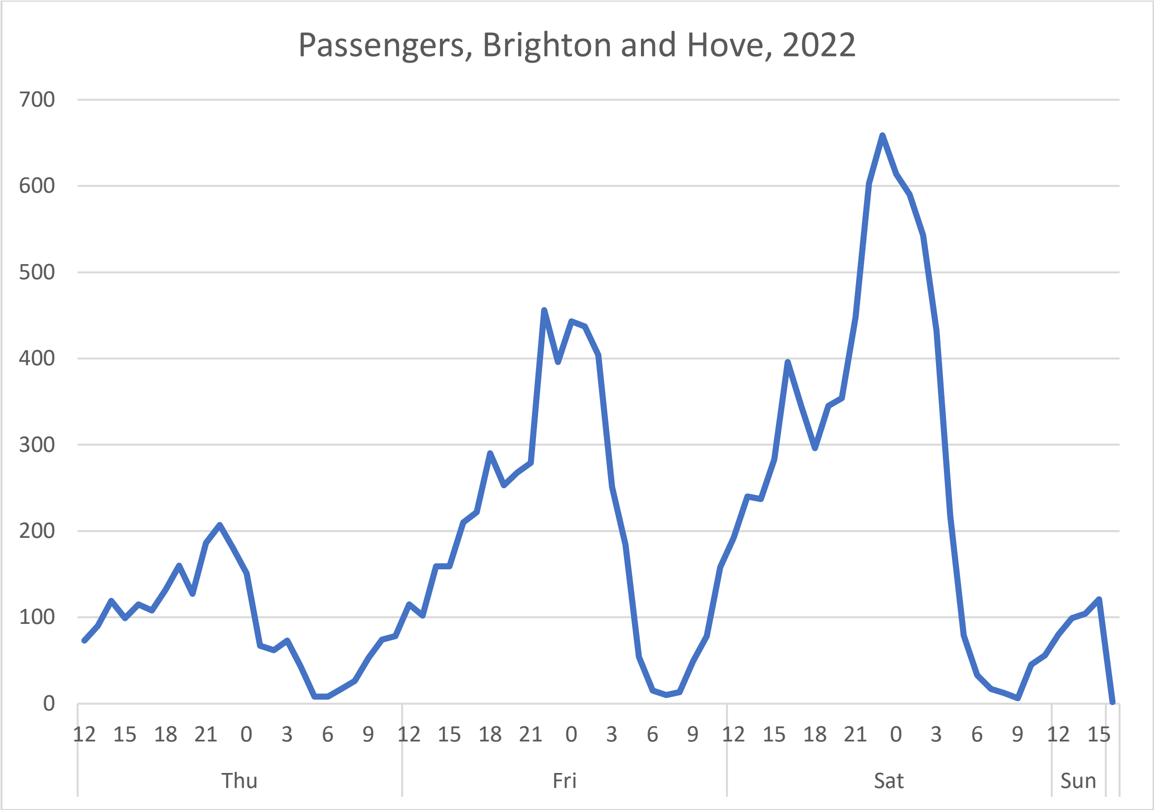
In terms of share between different ranks, the main change has been that East Street has actually seen passenger and share growth – now seeing 43% of all estimated weekly demand. It has overtaken the station, which has seen a drop of some 60% since 2018, although it remains the second largest patronage rank with about a fifth of all passengers estimated.

Both Queen Square and West Street have also seen both actual and share growth, though to a lesser extent than East Street. Hove Station has also seen decline, but only by 12% which is closer to the level of reduction of rail passenger numbers generally following the pandemic.

The hospital rank has seen significant growth, nearly fourfold, and has moved up the rankings to be the sixth highest compared to around ninth place in 2018. On the contrary, St Peter's Place has dropped to a third of its 2018 value with its share now 3%, rather than 9% in the last survey.

Consistent with other experience around the country, the three smaller ranks have continued to contract in levels of usage. All three (Old Ship, Brunswick Place and Palmeira Square) have actually continued decline in each of the last three surveys – although the latest levels of reduction are greater possibly due to the pandemic.

All the passenger rank usage information was drawn together to present the observed flows in the pictures below:

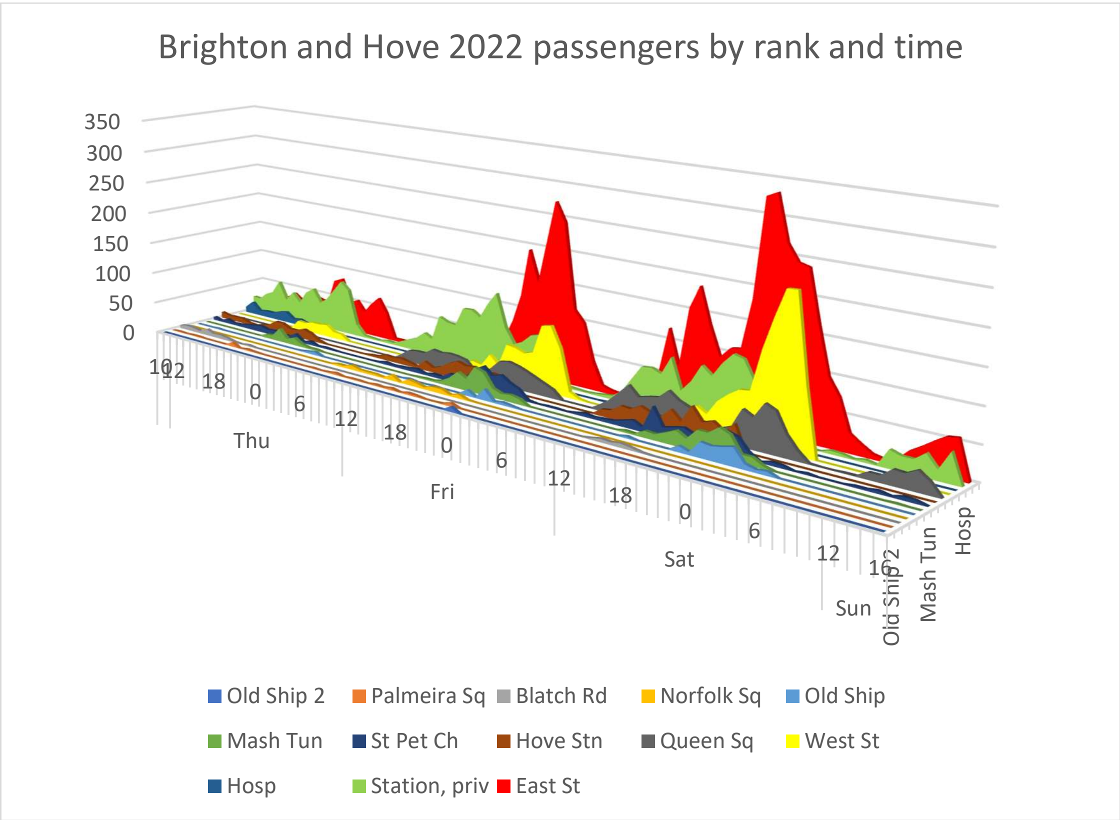


It should be noted that this represents only hours actually observed and recorded. However, the top five ranks were all observed in full and all ranks were observed at least at outline level to understand if they were active or not during the Thursday to Sunday observation period.

The total flow graph shows how flows build up each day but with Saturday the busiest overall, Friday second and Thursday the lowest in terms of overall flows. The peak total passenger numbers were 659 in the 23:00 hour on the Saturday, with previous day peaks being 456 in the 22:00 hour on the Friday and just 207 in the same hour on the Thursday. There was also no hour at all during our observations from 10:00 Thursday through to the 15:00 hour Sunday when there was no passenger flow from a rank somewhere in the Brighton and Hove area. The profile above also suggests that the demand for hackney carriages in the area is now peaky – with the highest hourly flow being 3.6 times the average flow over the observed period. This differs from the previous survey with Saturday now being significantly busier and Thursday much less busy – in the last survey the overall demand profile was not considered to be peaky.

When reviewed, the busiest five ranks account for 89% of the passengers observed during the survey period. The earlier table, using factors to produce average weekday estimates, suggested the busiest five ranks saw 85% of average weekly flows. This arises from one of the ranks seeing most of its flows at the weekends and some other ranks providing more regular custom through the week albeit at lower levels.

The graph below presents information from all ranks observed:



Whilst it demonstrates clearly the dominance of East Street for this survey, it also shows the Station makes a good contribution despite its declining usage, but that West Street provides significant flows, albeit mainly at weekends and in overnight hours (although it does see some daytime flows). All the other ranks make some contribution to the total, some focussing on more specific hours but most generally having a long period of activity.

Review of the hour by hour total flows across the authority area found no period when there was not use of a hackney carriage from a rank at one point or another. The picture also clearly shows that most of the smaller-used locations are providing more than a nominal contribution, demonstrating hackney carriages to be available across the area and over time wherever demand exists.

The station rank no longer has an ability to be shut off when the station is closed, although it can be taken out of use (as occurred on the Sunday) to allow rail replacement buses to service the station with the rank moved into the car park which is often less busy at such times.

Overall passenger service

The overall delay information was also reviewed. Of the 714 hours included in the passenger usage rank information (analysed in detail), 9% (2% in 2018) saw hours with average passenger delay of a minute or more. This covered 822 passengers, 45% of the overall total travelling in those hours. A further 16% (7% in 2018) saw average passenger delay that was not zero.

However, just 33 passengers, in 14 different hours, experienced a wait of 11 minutes or more for a hackney carriage to arrive at a rank. Given the overall high volumes travelling, this is a good service.

Vehicle activity

A test was undertaken on the Saturday to identify the level of hackney carriage vehicle activity which equated to the service levels provided. During the course of our sample observations, some 899 (more than the 444 from 2018) separate different vehicle movements were identified. Of these, 69% (75% in 2018) were actually local Brighton and Hove hackney carriage vehicles. A further 15% were local private hire. The remaining identifiable vehicles were split between various out of town authorities, although it was not always possible to discriminate from where. An approximate split (based on plate numbers beyond the local ranges) suggested 3% primarily identified as Uber (actual licensing area not identified, but could be locally registered), 7% from Lewes and 6% from Chichester.

Some 620 different Brighton and Hove hackney carriage movements were recorded in our sample. These accounted for some 45% of the current valid hackney carriage plates on issue at the present time. This suggests that the service provided on the Saturday afternoon and evening was covered by less than half the fleet. Even allowing for our observations being a sample, this still implies there is spare capacity available in the fleet to meet higher demand.

The level of vehicles active was also reviewed by time period. The table below compares the proportion of the fleet observed for each time period, comparing this with 2018:

Time Period	2022 % of fleet	2018 % of fleet
1415-1515	8	6
1530-1630	9	8
1730-1830	10	8
1900-2000	10	8
2045-2145	10	10
2200-2330	7	10
0000-0100	16	7
0130-0300	12	
Full periods covered	45	43

This shows that for most periods apart from the 2200 to 2330 that more plates were active in 2022 than in 2018. For the 0000 to 0100 period the number was significantly increased, although the previous period saw a slight reduction in 2022.

Disability Usage

For all rank hours for which detailed observations were undertaken, a record was made if the vehicle appeared to be a saloon or a wheel chair accessible style. 54% (59% in 2018) of all vehicles recorded as local hackney carriages appeared to be WAV style – a higher proportion than the 49% in the fleet at the time of the survey (up from 48% in 2018). This suggests the WAV style fleet tends to be marginally more active at ranks than the saloon style fleet.

During our survey, just three (six in 2018) people accessed hackney carriages at ranks in wheel chairs. This is a moderate level of usage – but lower than that seen in 2012 and 2015 surveys. These 2022 examples were at East Street and the Station. A further 53 (only 16 in 2018) people were observed to have some sort of disability, but not a wheel chair. These people were observed at 11 different rank locations. This suggests a very good spread of actual usage of hackney carriages by those needing either WAV or assistance into vehicles.

Rank usage by other vehicles

A review was also undertaken of other vehicle types observed at or near the ranks which were watched in detail. During our survey, some 24,321 different vehicle movements were logged. Of this total, 87% were actually hackney carriage vehicles, suggesting a generally high level of compliance with ranks by other vehicles (but lower than the 96% of 2018). Cars abused ranks about 8% of the time, with some small levels of abuse by goods vehicles, emergency services, out of town and local private hire, but not too much overall. The increase in car abuse is being seen around the country at the moment given that during the pandemic ranks tended to be less-used whilst more people used their own private vehicles, finding ranks good places to stop.

We observed a good number of cases where hackney carriage drivers did move private vehicles on when they found them blocking the ranks. This was particularly true at the Mash Tun and Old Ship locations, although in the latter location there was clear abuse by people parking for longer periods on the rank and heading towards the seafront.

In this survey, the worst location for seeing out of town vehicles principally setting down at or close to ranks was at the Mash Tun location, followed by St Peter’s Church, the Old Ship and East Street ranks.

4 General public views

It is very important that the views of people within the area are obtained about the service provided by hackney carriage and private hire. A key element which these surveys seek to discover is specifically if people have given up waiting for hackney carriages at ranks (the most readily available measure of latent demand). However, the opportunity is also taken with these surveys to identify the overall usage and views of hackney carriage and private hire vehicles within the study area, and to give chance for people to identify current issues and factors which may encourage them to use licensed vehicles more.

Such surveys can also be key in identifying variation of demand for licensed vehicles across an area, particularly if there are significant areas of potential demand without ranks, albeit in the context that many areas do not have places apart from their central area with sufficient demand to justify hackney carriages waiting at ranks.

These surveys tend to be undertaken during the daytime period when more people are available, and when survey staff safety can be guaranteed. Further, interviews with groups of people or with those affected by alcohol consumption may not necessarily provide accurate responses, despite the potential value in speaking with people more likely to use hackney carriages at times of higher demand and then more likely unmet demand. Where possible, extension of interviews to the early evening may capture some of this group, as well as some studies where careful choice of night samples can be undertaken.

Our basic methodology requires a sample size of at least 200 to ensure stable responses. Trained and experienced interviewers are also important as this ensures respondents are guided through the questions carefully and consistently. A minimum sample of 50 interviews is generally possible by a trained interviewer in a day meaning that sample sizes are best incremented by 50, usually if there is targeting of a specific area or group (eg of students, or a sub-centre), although conclusions from these separate samples can only be indicative taken alone.

It is normal practice to compare the resulting gender and age structure to the latest available local and national census proportions to identify if the sample has become biased in any way.

More recently, general public views have been enlisted from the use of council citizens' panels although the issue with these is that return numbers cannot be guaranteed. The other issue is that the structure of the sample responding cannot be guaranteed either, and it is also true that those on the panel have chosen to be there such that they may tend to be people willing to have stronger opinions than the general public randomly approached.

Finally, some recent surveys have placed an electronic copy of the questionnaire on their web site to allow interested persons to respond, although again there needs to be an element of care with such results as people choosing to take part may have a vested interest.

For this survey, 287 of the target of 300 interviews were obtained. 143 were undertaken on a Tuesday in July with the balance of 144 on a Wednesday in August. 93 of these were undertaken near Brighton Station. 75 were undertaken in Queens Road, 58 in Churchill Square and the remaining 61 in George St, Hove.

The sample contained slightly more males than the latest 2021 census proportions suggest (51% compared to 49%) (in 2018 the match to gender was exact). The level of the mid-age group in the sample matched the census but the lower age group was under-represented (22% compared to 28%) with a corresponding over-representation of the older group (37% compared to 39%). This was reverse to that from 2018 which itself had been similar to 2015. The strong over-emphasis (56% sample compared to 42% census) for the mid-group in 2018 had therefore been rectified, with a better older sample also obtained.

88% (72% in 2018) said they lived in the area – another improvement in this latest sample. Those not from the area were mainly BN postcodes, with a few further away (one Newcastle and one Australia!)

For this sample, 32% said they had used a hackney carriage (only) in the past three months, with 21% private hire only and 9% saying they had used both private hire and hackney carriage. This left 38% who had not used either type of vehicle in the last three months. Again, this is a better sample than in 2018 when a very low 16% told us they had used a licensed vehicle in the last three months in the area, compared to 33% in 2015 (62% in 2022).

The resulting level of trips per person per month was moderate at 1.8 (compared to 0.49 in 2018 and 1.5 in 2015). The average reduced to 1.4 (0.16 2018) trips for hackney carriage specific, or 78% (34% in 2018) of the overall total, higher than 2018 but still lower than the 87% in 2015.

The most frequent usage level, with 18% of respondents was once or twice a year – for hackney carriages this value was 12% but tempered by the inclusion of the 'can't remember when I last used' or 'can't remember seeing a hcv in this area' to the hackney carriage element (47%).

The 47% of people responding who said they could not remember the last time they used a hackney carriage (compared to 21% in 2018 and 5% in 2015), but a very encouraging just one person (none in 2018) said they could not remember seeing one – potentially a result of the livery policy in the area.

77% of those interviewed told us how they normally got a licensed vehicle in the Brighton and Hove area. 45% (40% 2018) telephoned, 43% (32% 2018, 36% 2015) used a rank, 9% (19% in 2018) used an app and 3% (6% in 2018) hailed. In this survey no-one said they used a freephone (3% in 2018).

People were asked who they phoned for a licensed vehicle. Of the total answers provided, the top two companies both obtained 33% each (in 2018 the top company obtained 49%, second 18%, suggesting an evening out of these two performances). The next two companies obtained 11% (up from 3% in 2018) and 10%, the latter being a national app company (value down from 13% in 2018). Three other companies obtained 4%, 3% and 2% with two others just getting a single mention. This provides more named companies now than in 2018 with more than a single mention and suggests there has been some improvement in peoples' knowledge and usage of two of the top four named since 2018.

The reduction in quoted use of apps as well as reduction in the company level of quoted usage is notable (and should be an encouragement to the local trade). The responses suggest only one app company is active.

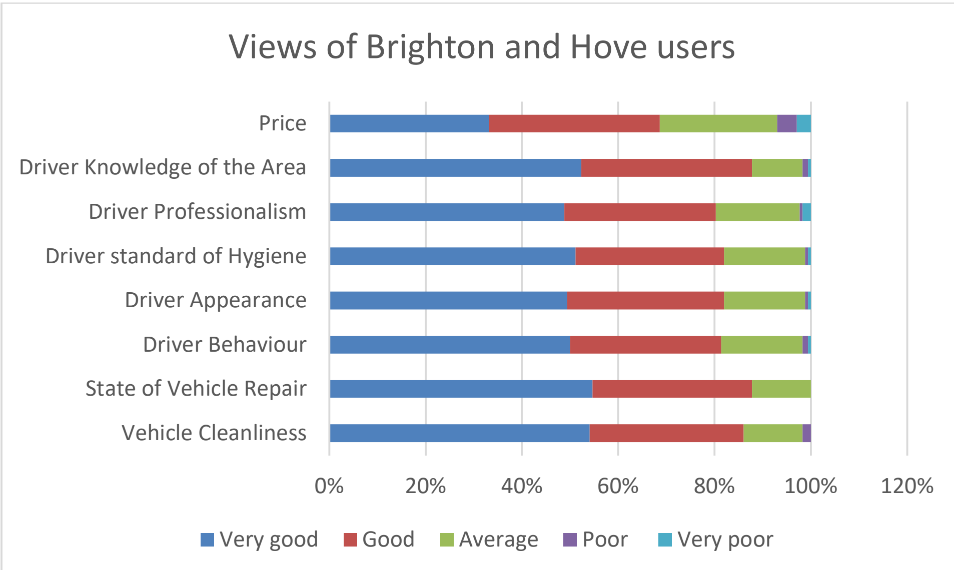
63% of those responding provided between one and three rank location names they were aware of. 22% named three locations, 21% two and 57% just a single location.

20 separate names were given for the rank locations that people were aware of – similar in number to the 22 of 2018. 54% (27%) said Brighton Station, 20% (17%) said Churchill Square (actually Queen Square), but also called it the Clock Tower or Churchill Shopping Centre, 18% East Street (mainly called The Lanes but also Castle Square)(well up from the 5% of 2018). 2% of mentions were for Hove Town Hall and 2% for the Royal Sussex Hospital / Paston Place. 1% mentioned Old Steine and a further 1% Tesco Queens Road. Seven other locations gained one mention each, including Hove Station, West Street and the Hilton, but also some other uncertain locations such as Brighton Town Hall. Some locations mentioned in 2018 (9% for George Street Hove and 7% for North Street saw no mentions this time.

A slightly reduced level of 53% (from 60% in 2018) said they would use the ranks they had named. Interestingly, 56% of those aware of the railway station rank said they did not use it. Only Hove Town Hall rank (60% not using) had a higher value for non-use by those quoting it. 41% did not use Queen Square and 36% did not use East Street though quoting these. Many of the uncertain ranks quoted saw people say they did not use them. On this basis they could be places people had seen hackney carriages waiting.

All those quoting Paston Place, Hove Station, West Street, Old Steine and the Hilton rank said they used these ranks. Lack of mention of many night ranks may reflect the daytime nature of the interviews.

Those interviewed were asked to provide their rating of various aspects of the service provided on their most recent licensed vehicle trip. 60% provided their views. The graph below provides the results:



As is typical, for all but price, the dominant response was that the service received was 'very good'. There are very few 'very poor' responses at all, with price being the aspect with the most for both 'very poor' and 'poor', and the least 'very good' (although even for this 33% felt price was 'very good' and a further 35% felt 'good'). These responses are consistent with those in 2018 where there were very few responses when people were asked if they had any problems with the hackney carriage service in Brighton.

The only significant comment for those providing further information about poor experiences related to the trip being too expensive, with several other more specific comments also relating in part to issues of the cost. One person said they had an issue that their driver did not appear to like dogs but no further information was provided.

A slightly lower proportion – 57% of those interviewed – told us the matters that might encourage them to use hackney carriages or use them more. As is usual, the top scoring matter was if the vehicles were more affordable (73%). Given this was a stated item people could choose, very few other items were then named. The next highest score was for better driver quality (12%) followed by more hackney carriages which could be hailed or obtained at a rank.

In the other comments, two people said they would increase usage were the vehicles clearly more environmentally friendly. One said if more took card payments and one said if the rank was returned to the front of Brighton station.

In terms of disability, 80% (89% in 2018) said neither they, nor anyone they knew, needed any form of adapted licensed vehicle. This was a further reduction from the 96% of 2015. Of those responding of need for an adapted vehicle, nearly all needed a WAV compared to those needing a different adaptation. This is a much stronger request for WAV styles than in 2018.

The latent demand factor based on people giving up waiting at ranks was 8% - much increased from the low level of 1.5% in 2015, but lower than the 8.6% of 2018. Checking when people had given up, most had done so recently although some were quoting pre-covid experiences.

The station was the main place people had given up waiting, followed by Queen Square. For those giving a response, two thirds said if they failed to get a vehicle at a rank they walked away and hailed a vehicle.

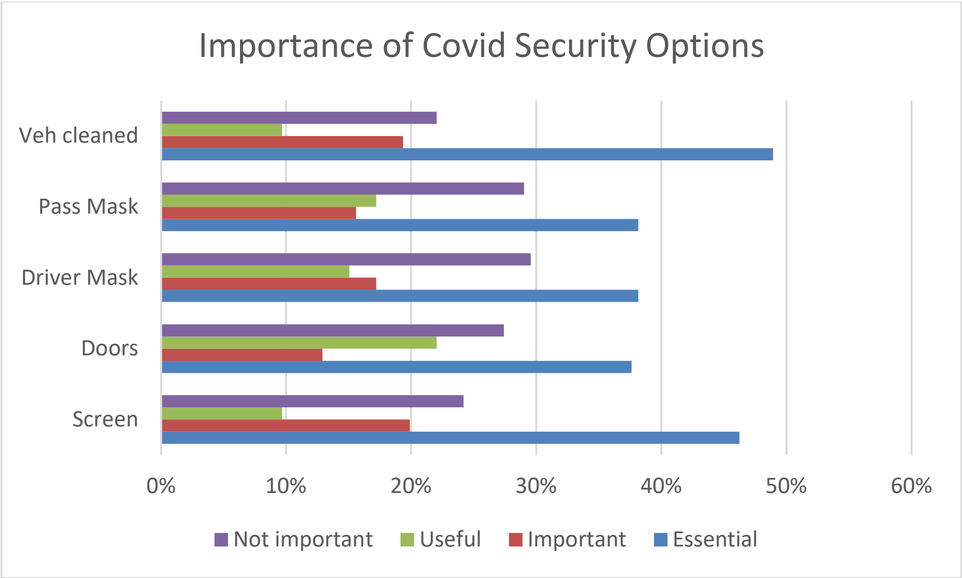
People were asked what activities for which they were totally reliant on use of a licensed vehicle. Just 18% responded, although 55% of these said there were no such activities. The top response from those giving a specific response was a third saying for nights out. 21% said hospital visits, 13% holidays an 8% for airport trips. Single mentions were given for musical events, out of town events, station journeys, when buses did not turn up or for work.

78% (70% in 2018) felt there were enough WAV in the Brighton and Hove area.

People were asked how they thought their use of licensed vehicles had changed from pre-Covid times. 72% said they used licensed vehicles about the same. Whilst 16% said they used hackney carriages less, 3% said they used them more, giving a net reduction of 13%. For private hire the values were 3%, 5% and plus 2%.

In terms of looking forward, a higher 77% said their current patterns of usage would remain similar. 10% said they expected to use hackney carriages more and 4% said less (net 6% gain), whilst for private hire the values were 2%, 7% and therefore a net 5% gain.

People were asked what level of importance they gave to various Covid security options. Given these responses were in Summer 2022, these remain important to people despite the general return to more normality. 65% of those interviewed provided response, again confirming these issues remain important to people. The graph below presents the results:



Vehicles being cleaned are seen as essential by 49%; followed by the need for a screen. Masks for both passenger and driver, and door opening are all equally essential for 38% of those responding. However, the not important response is always the second highest value suggesting some polarisation of views.

5 Key stakeholder consultation

The following key stakeholders were contacted in line with the recommendations of the BPG:

- Supermarkets
- Hotels
- Pubwatch / individual pubs / night clubs
- Other entertainment venues
- Restaurants
- Hospitals
- Police
- Disability representatives
- Rail operators
- Other council contacts within all relevant local councils

Comments received have been aggregated below to provide an overall appreciation of the situation at the time of this survey. In some cases there are very specific comments from one stakeholder but we have tried to maintain their confidentiality as far as is possible. The comments provided in the remainder of this Chapter are the views of those consulted, and not that of the authors of this report.

Our information was obtained by telephone, email, letter or face to face meeting as appropriate. The list contacted includes those suggested by the Council, those drawn from previous similar surveys, and from general internet trawls for information. Our target stakeholders are as far as possible drawn from across the entire licensing area to ensure the review covers the full area and not just specific parts or areas.

For the sake of clarity, we cover key stakeholders from the public side separately to those from the licensed vehicle trade element, whose views are summarized separately in the following Chapter.

Unfortunately, since Covid, the responsiveness of nearly all key stakeholders to non-statutory requests for information has reduced significantly. This is particularly true of supermarkets, but also covers most other potential stakeholders. However, we have still presented people with the option of response as far as practicable, and a none-response might suggest there are no pressing issues otherwise people would take their opportunity. Further, key stakeholders could also contact licensing sections or the council in general about issues but this only very rarely occurs.

The only responses received came via the on-line response. Three respondents told us all their customers used local taxis. A third asked staff to book a vehicle, a third phoned using the premises phone, and a third phoned using their own private mobile phones. None of those responding said their customers used ranks despite two of the three being aware of ranks they could use.

Two of the three said they did not get complaints although the other respondent said they did, but they did not explain what that was.

A total of 60 key stakeholders were contacted by email with just one responding directly and the three noted above using the on-line form. Whilst this level of response is disappointing this is more the new normal. Several major stakeholders did not respond at all nor give any reason why they did not respond.

Disability

One respondent told us their wife was a wheelchair user and that as a couple they relied on licensed vehicles to travel to and from central Brighton. The two most recent uses saw vehicles arriving 40 minutes late, leading to missing a hospital appointment and part of a key family wedding. These two trips had both been booked the day before and included phone chasing to the company whilst waiting. They have also had significant issues in having to persuade the drivers of wheel chair adapted vehicles on ranks to take them – with a good number quoting they had medical exemptions from loading wheelchairs into their adapted vehicles.

Despite contact being made, and in some cases acknowledged as received, no other response returned from any key disability organisation or representative. Further contact was made in late August but nothing specific resulted other than one claim we had not provided sufficient time nor appropriate ways they could respond.

Rail and other transport operators

National rail statistics are available that summarise total entries and exits from each station in the national rail network. The busiest station is identified as 1st, with each successive station seeing less patronage. In the latest data available, which considers the year ending in March 2021, Brighton has moved up the table to be the 22nd (was 28th in the 2017 data) busiest station in the national network. Other stations within the Brighton and Hove area are further down the list (Hove is 241st, Portslade 482nd (577th), Falmer 527th (477th), Preston Park 609th (855th), Moulsecoomb 935th (1,109th) London Road Brighton 937th (1029th) and Aldrington 1,227th with around 58,200 departures and arrivals).

Notably, there are only active ranks at the top two stations.

The table below shows Brighton station growth over the years the information has been available.

Rail year (ends March in last year noted)	Entries / exits	Growth / decline
Brighton (28th)		
1997 / 1998	7,376,192	n/a
1998 / 1999	8,309,344	+13%
1999 / 2000	8,930,344	+7%
2000 / 2001	9,282,656	+4%
2001 / 2002	10,153,601	+9%
2002 / 2003	10,368,208	+2%
2003 / 2004	Not collected	
2004 / 2005	11,295,080	+9%
2005 / 2006	11,854,512	+5%
2006 / 2007	12,853,442	+8%
2007 / 2008	13,474,555	+5%
2008 / 2009	13,806,628	+2%
2009 / 2010	13,741,582	-0.5%
2010 / 2011	14,493,010	+5%
2011 / 2012	16,052,520	+11%
2012 / 2013	16,187,024	+1%
2013 / 2014	16,940,764	+5%
2014 / 2015	17,170,740	+1%
2015 / 2016	17,333,326	+1%
2016 / 2017	15,993,072	-8%
2017 / 2018	16,928,728	+6%
2018 / 2019	17,384,634	+3%
2019 / 2020	17,355,572	-0.2%
2020 / 2021	4,149,082	-76%

Not surprisingly, the first full year after the onset of the pandemic saw levels of patronage significantly reduced – by some 76%. Years prior to this had seen mixtures of decline and growth, with the final year including the first few weeks of the pandemic seeing a slight reduction in overall flows. We understand that flows nationally are now more like 90% of pre-pandemic but new data specifically by location will not be available till November 2022 (for the year ending March 2022).

Brighton Transport Policy

A representative from the Transport Policy section of the Council provided the following comment:

"*The Taxi Trade continues to be engaged with the council's work on transport policy and projects primarily through its Forum and representation on the city's Transport Partnership. More focused engagement on individual projects takes place when required, including locations with taxi ranks. In particular, in 2021 the trade was engaged directly as a key stakeholder during the council's consultation on its Local Cycling and Walking Infrastructure Plan and its emerging Local Transport Plan.*

Since the relocation of Brighton station's taxi rank to the rear in 2019, NO2 levels have also improved substantially around Queen's Road. In seeking to reduce emissions to improve air quality and achieve net-zero carbon by 2030, there has been a particular emphasis on working with the trade to enable the uptake of electric vehicles. This has included a significant increase in the overall provision of electric vehicle charging points in the city generally, and in particular rapid charging points for taxis ".

6 Trade stakeholder views

The BPG encourages all studies to include 'all those involved in the trade'. There are a number of different ways felt to be valid in meeting this requirement, partly dependent on what the licensing authority feel is reasonable and possible given the specifics of those involved in the trade in their area.

The most direct and least costly route is to obtain comment from trade representatives. This can be undertaken by email, phone call or face to face meeting by the consultant undertaking the study. In some cases to ensure validity of the work being undertaken it may be best for the consultation to occur after the main work has been undertaken. This avoids anyone being able to claim that the survey work was influenced by any change in behaviour.

Most current studies tend to issue a letter and questionnaire to all hackney carriage and private hire owners, drivers and operators. This is best issued by the council on behalf of the independent consultant. Usual return is now using an on-line form of the questionnaire, with the option of postal return still being provided, albeit in some cases without use of a freepost return. Returns can be encouraged by email or direct contact via representatives. Some authorities cover private hire by issuing the letter and questionnaire to operators seeking they pass them on when drivers book on or off, or via vehicle data head communications.

In all cases, we believe it is essential we document the method used clearly and measure response levels. A letter was issued to all drivers, with the option to return by post or complete on-line. A total of 261 (149 in 2018) responses were received, in the order of a 19% (10% in 2018) response, excellent for this kind of survey. This shows a continual increase in the level of response from drivers initially shown with a doubling of responses between 2015 and 2018. Nearly all the responses were via the on-line portal although some were printed and posted back to us for manual entry. The responses were provided mainly during February 2022, ahead of the main survey work, in order to allow some feedback into the design of the main survey work, specifically with reference to the rank surveys.

A check was made of responses to identify any duplication or test comments, and just one response was removed. There did not appear to be any duplicates or repeated entries.

Of those responding, 85% said the licenced vehicle trade was their only or main source of income. 6% said they worked part time with other sources of income, 5% worked part time with no other source of income, 4% said they were not currently working but would return when demand did, and just one person said they were not presently working in the licensed vehicle industry and had no intention of returning.

60% (81% in 2018) of respondents said they drove hackney carriages and 34% (19%, 2018) said private hire (a lower proportion of hackney carriage response than in 2015). A further 5% said they drove both hackney carriage and private hire with 2% saying they did not drive vehicles.

48% said their normal work was immediate hire from ranks, 39% immediate hire from bookings, 11% from advanced bookings and 2% from chauffer or corporate work.

Overall, the average length of service was 16.6 years (19.5 in 2018), although for the hackney element this was marginally higher at 18.1 years (21 in 2018), with private hire quoting 14.0 years. Those not driving and those driving both were exclude from these specific calculations. These figures suggest that many of those with longer experience may have retired now.

The maximum length of service quoted overall was 47 years (49 in 2018). For private hire respondents, the maximum quoted was 35 years. There was at least one person who confirmed they had just started working in the industry.

The number of days worked is shown below:

No. of days worked	% in 2022	% in 2018
None	11	1
7	12	8
6	24	39
5	33	34
4	10	10
3	6	6
2	3	2
1	1	
Average	4.6	5

This shows the major change being more now working six days (almost doubled) and more not working, with the proportion working seven days up by a half. Interestingly, the proportion working 5,4,3 and two days has remained remarkably similar. However, overall the average no. of days worked has gone down marginally, principally a result of 11% saying they had not worked.

The average hours quoted for working the previous week were just over 39 (43, 2018) for hackney carriage and 32 (41) for the private hire respondents. This is similar to 2015. The maximum hours worked, interestingly for a private hire driver, was 74 hours, the same as in 2018 whilst hackney carriages maximum was 80 hours. This confirms the previous figures that working hours have reduced overall, more so for the private hire sector.

For 2022, two thirds provided comment about what affected when they worked. The top matter was 'family' (37% now, 22% in 2018, and increased again from 2015 levels). 9% avoided heavy traffic (14% in 2018). 10% (17% 2018) worked when there was higher demand. 8% said contracts determined their shifts whilst 7% said they preferred daytimes. 5% avoided difficult passengers, usually avoiding late nights. 3% had times they worked impacted by sharing a vehicle (reduced from the 11% of both 2018 and 2015). The remaining reasons did not exceed 2% of the total response each (but made up 12% in total).

73% (74% in 2018) said they owned and drove their own vehicle.

A much reduced 20% (was 52% in 2018) said someone else drove the vehicle they used. Further, 24% of those saying no-one else drove the vehicle said this had changed since pre-Covid times, overall showing that sharing of vehicles had reduced due to Covid.

32% (41% in 2018) said the vehicle was also used by others in the daytime, 14% (22%) at night, 6% (11%) in evenings, and 28% (8%) simply when they were not using it. Various other choices were also given, none of which accounted for more than 4% each.

77% (up from two thirds in 2018) said they accepted pre-bookings, with 24% naming one company, 12% another and 23% 'via office'. 9% used a named app and 8% a national app. 3% said 'app' but did not name which. Many other smaller companies or methods were named, but none accounting for over 2% of the total (albeit making 14% of overall responses).

When asked how people most frequently got their fares, 53% said phone bookings, 35% rank, 7% other, 4% school contracts and just 1% hailing.

44 (slightly less than the 48 of 2018) locations were quoted for use of ranks. Many were colloquial or slightly different names. This time 'town centre' 'any in town' or 'all' comprised just 1% of responses, compared to 3% saying 'all' ranks in 2018. The top rank mentioned was East Street, with 20% (21% in 2018) of responses, followed by Paston Place (hospital) with 10% (5% in 2018). Queen Square obtained 9% (5% 2018). 8% each said Hove Town Hall, Hove Station or St Peters (the latter two the same shares as in 2018).

Brighton Station reduced from 15% in 2018 to 7% now. West Street saw increased quoted level of 7% compared to 5% in 2018. The other locations received between 2% and just a single mention. Overall, this suggests a good service to a wide range of ranks. Compared to 2018 Paston Place and Queen Square both moved up whilst the station lost share (halving). West Street also saw some increase.

86% (88% in 2018) felt there were enough hackney carriages and 90% felt there were enough wheel chair accessible vehicles. This covered all respondents.

In 2018, the question was posed if those trade persons responding supported the limit (overall) and the managed growth of five plates per year. The answer available was yes or no. The results from this in 2018 were generally inconclusive and possibly confused given the way the question was worded. In 2018 53% supported the overall policy and 47% did not with the detailed split shown in the table below:

2018 policy question	Agree %	Disagree %
HC Drivers Only	12	14
HC Owner and Driver	30	25
Private Hire Driver Only		1
Private Hire Owner Driver	11	7
Totals	53	47

As might be expected, those that were hackney carriage drivers only were marginally more against whilst hackney carriage owner drivers were more in favour, as were private hire owner drivers. The results are not really significant either way.

However, for this survey it was agreed that other issues were both easier to obtain views about clearly and more important to understand, whilst re-wording the question and splitting the limit and managed growth policies in separate questions was unlikely to obtain robust answers. There was option for any driver to add a comment at any point regarding either element and though lots of points were made that the limit prevented further dilution of trade, only one comment was received seeking the managed growth be switched off. Further discussion of the responses to the question focussing on what respondents felt the benefit of the limit was, is given below.

Respondents were asked how they thought having a limit on the number of hackney carriages benefitted the public. This question is offered in free format to give people their opportunity to provide their specific views without being led. This does, however, lead to issues in summarising what can be a very large range of comments, but overall this is considered better than suggesting responses.

Whilst a good number gave reasons they thought the limit benefitted the public, of the 261 respondents, 21% gave no response. This left 205 responses. Of these 205, 5% said they had no view or the question was not relevant (either to them or overall). 24% made comments suggesting they disagreed that limits provided any benefit to the public. A further 6% said they were not sure what their view was. This leaves 65% of those responding considering the limit had a public benefit.

However, some just reiterated they thought there was a public benefit but could not say what (8% of total). One of the strongest points made, in various different ways, was that the limit prevented further uncontrolled hackney carriage plate growth which they felt would be of harm to the public as it would make it harder for those in the trade to make a living and hence service the public well.

7% said the principal public benefit was ensuring congestion did not get any worse. The remainder quoted various aspects of service provided – vehicle standards, better driver state of mind, provision of a better maintained fleet, provision of WAV, keeping fares lower, restraining pollution and not least ensuring there was a fixed group of drivers who would therefore have better chance of knowing customers or being known by them.

Whilst 70% of those in favour were hackney carriage drivers, 26% were private hire and 4% were those saying they drove both kinds of vehicle. Interestingly, within those clearly saying there is no benefit to the public, half were hackney carriage, 42% private hire, 4% those that drove both and 4% those that did not drive. Some of the hackney carriage drivers saying there were no limits made other suggestions which have no legal backing in England, such as limiting private hire numbers, or out of town vehicles. One of those saying there was no public benefit was a hackney carriage driver who wanted to own their own plate but felt they were a long way from the top of the waiting list to be able to do so.

Questions were posed about how drivers felt the pandemic had impacted on their businesses. It was clear the impact had been significant and that many remained sceptical about the future, though some were more positive.

Drivers were asked what challenges or barriers they considered there were with respect to moving the overall licensed vehicle fleet towards more sustainable styles. Again this was a free-format question. 25% provided no response. A further 12% responded that they were unsure of their views or on what challenges or barriers there might be. A further 8% made various comments partly unrelated to the issue – with the largest proportion of those being 5% of the total who said that the issue of operation of out of town plates needed to be resolved more urgently.

By far the largest barrier quoted by 43% of those giving an answer was concern about the cost. 17% were concerned that the various issues related implied reduced viability for the trade. 5% said they felt sustainable vehicles, particularly electric ones, were not really practicable for use as taxis, and 4% were concerned of the lack of infrastructure.

For this question, 62% of responses came from hackney carriage, 32% from private hire, 5% from those driving both and 1% from those not driving. This suggests the issue feels more urgent to hackney carriages.

Drivers were then asked if they could suggest any support or incentives the council could use to overcome those barriers. Again, the response was allowed to be free-format to ensure no novel ideas were suppressed.

Of all respondents, 27% provided no response. A further 13% said they had no ideas and 7% that they did not know. 3% gave responses suggesting the change was coming too early or was never going to be practicable. Another 11% gave a range of reasons not making positive suggestions re sustainable vehicle introductions but making other comments. In similar vein were 6% whose suggestion was that out of town vehicles needed to be stopped first.

The remaining third made positive suggestions. From the total respondents, 11% suggested grants whilst 12% said subsidies. 2% suggested more charge points, 2% a council EV testing programme and 2% said giving anyone offering to put on an EV a hackney carriage plate. The remaining 4% made other positive suggestions but that were made by mainly a single person or at most two respondents.

This overall suggests some support, but not strong support, for moving to sustainable vehicles.

A question then sought the views of drivers how others could be encouraged to seek licences from Brighton and Hove rather than other authorities. 74% of those responding provided a response. Many restated the issue; few could suggest appropriate changes. Many thought national legislation would be needed whilst some said simplify the process and others thought the main issue was the knowledge test.

Many said Brighton standards, though amongst the highest around the country, were appropriate and should not be diluted. One suggestion was that use of bus lanes should be for 'local' vehicles only but none said how this could be enforced. A handful did not feel there was any issue.

Respondents were allowed to provide final other comments. Just over 51% made some form of comment, although 13% of the total said 'no' or 'none' (reducing the actual responses therefore to 38%). Many reiterated views already given, although there were two who were complimentary about the licensing service and their work. Two mentioned need to resolve the issue of the station rank being moved to what they felt was a much less serviceable location.

Overall, the free-format questions demonstrated a wide range of views from the current trade. Whilst some were critical and others supportive of the overall licensing function, the clear and strong view was that whatever action that could be taken re out-of-town vehicles needed to be actioned.

With reference to changes since the pandemic, 48% of those responding said they were aware of drivers that had given up due to the impacts of the pandemic. Two drivers said they were aware of 100 who had given up, but most responses were between one and five drivers (each getting 14% to 16% of the total responses).

Representatives

The Brighton and Hove Cab Trade Association provided a written statement.

They began with a statement confirming that, with the streets and ranks clearly well-served, there were enough hackney carriages to serve the city, which they pointed out was the main question for any unmet demand survey.

However, they did recognise the issue of need for more plates was an emotive subject particularly for those on the waiting list for a plate compared to those that were already proprietors.

They felt that the current level of 50% WAV style vehicles provided for an equal provision for all abilities.

They pointed out the five plates per year had continued to be issued despite many plates being handed back or recorded as 'off road' during the pandemic.

They pointed out that Uber operations were a major impact on both hackney carriage and private hire operations in the City. The key issue to BHCTA was the continued practice of Uber using out of town registered vehicles and drivers. They pointed out this implies these vehicles are beyond their local enforcement.

They also consider these vehicles are not to the standard required for operating in Brighton. They confirm they have reported their concerns and issues to the out of town licensing authorities. A further concern is that they believe that the condition of having a minimum level of WAV within an operators fleet is being thwarted by that element of the app being turned off by some operators. They asked for this point to be made in this report.

They also were concerned about surge pricing being applied by app-based private hire. There were concerns about the change of location of the rank at the station. They felt the continued issue of managed growth plates should be clearly reviewed.

Further information was provided outlining discussions that were occurring regarding how customer service might be improved and the overall concerns for the future particularly with reference to some revisions that might reduce the potential for impact of out of town vehicles moving forward. These were ongoing at the time of writing the report and may be further informed as the full content of the report is taken on board.

7 Evaluation of unmet demand and its significance

It is first important to define our specific view about what constitutes unmet demand. Our definition is when a person turns up at a hackney carriage rank and finds there is no vehicle there available for immediate hire. This normally leads to a queue of people building up, some of who may walk off (taken to be latent demand), whilst others will wait till a vehicle collects them. Later passengers may well arrive when there are vehicles there, but because of the queue will not obtain a vehicle immediately.

There are other instances where queues of passengers can be observed at hackney carriage ranks. This can occur when the level of demand is such that it takes longer for vehicles to move up to waiting passengers than passengers can board and move away. This often occurs at railway stations, but can also occur at other ranks where high levels of passenger arrivals occur. We do not consider this is unmet demand, but geometric delay and although we note this, it is not counted towards unmet demand being significant.

The industry standard index of the significance of unmet demand (ISUD) was initiated at the time of the introduction of section 16 of the 1985 Transport Act as a numeric and consistent way of evaluating unmet demand and its significance. The ISUD methodology was initially developed by a university and then adopted by one of the leading consultant groups undertaking the surveys made necessary to enable authorities to retain their limit on hackney carriage vehicle numbers. The index has been developed and deepened over time to take into account various court challenges. It has now become accepted as the industry standard test of if identified unmet demand is significant.

The index is a statistical guide derived to evaluate if observed unmet demand is in fact significant. However, its basis is that early tests using first principles identified based on a moderate sample suggested that the level of index of 80 was the cut-off above which the index was in fact significant, and that unmet demand therefore was such that action was needed in terms of additional issue of plates to reduce the demand below this level, or a complete change of policy if it was felt appropriate. This level has been accepted as part of the industry standard. However, the index is not a strict determinant and care is needed in providing the input samples as well as interpreting the result provided. However, the index has various components which can also be used to understand what is happening in the rank-based and overall licensed vehicle market.

ISUD draws from several different parts of the study data. Each separate component of the index is designed to capture a part of the operation of the demand for hackney carriages and reflect this numerically. Whilst the principal inputs are from the rank surveys, the measure of latent demand comes from the public on-street surveys, and any final decision about if identified unmet demand is significant, or in fact about the value of continuing the current policy of restricting vehicle numbers, must be taken fully in the context of a careful balance of all the evidence gathered during the survey process.

The present ISUD calculation has two components which both could be zero. In the case that either are zero, the overall index result is zero, which means they clearly demonstrate there is no unmet demand which is significant, even if other values are high.

The first component which can be zero is the proportion of daytime hours where people are observed to have to wait for a hackney carriage to arrive. The level of wait used is ANY average wait at all within any hour. The industry definition of these hours varies, the main index user counts from 10:00 to 18:00 (i.e. eight hours ending at 17:59). The present index is clear that unmet demand cannot be significant if there are no such hours. The only rider on this component is that the sample of hours collected must include a fair element of such hours, and that if the value is non-zero, review of the potential effect of a wider sample needs to be considered.

The other component which could be zero is the test identifying the proportion of passengers which are travelling in any hour when the average passenger wait in that hour is greater than one minute.

If both of these components are non-zero, then the remaining components of the index come into play. These are the peakiness factor, the seasonality factor, average passenger delay, and the latent demand factor.

Average passenger delay is the total amount of time waited by all passengers in the sample, divided by the total number of passengers observed who entered hackney carriages.

The seasonality factor allows for the undertaking of rank survey work in periods which are not typical, although guidance is that such periods should normally be avoided if possible particularly as the impact of seasons may not just be on the level of passenger demand, but may also impact on the level of supply. This is particularly true in regard to if surveys are undertaken when schools are active or not.

Periods when schools are not active can lead to more hackney carriage vehicles being available whilst they are not required for school contract work. Such periods can also reduce hackney carriage demand with people away on holiday from the area. Generally, use of hackney carriages is higher in December in the run-up to Christmas, but much lower in January, February and the parts of July and August when more people are likely to be on holiday. The factor tends to range from 0.8 for December to 1.2 for January / February.

There can be special cases where summer demand needs to be covered, although high peaks for tourist traffic use of hackney carriages tend not to be so dominant at the current time, apart from in a few key tourist authorities.

The peakiness factor is generally either 1 (level demand generally) or 0.5 (demand has a high peak at one point during the week). This is used to allow for the difficulty of any transport system being able to meet high levels of peaking. It is rarely possible or practicable for example for any public transport system, or any road capacity, to be provided to cover a few hours a week.

The latent demand factor was added following a court case. It comes from asking people in the on-street questionnaires if they have ever given up waiting for a hackney carriage at a rank in any part of the area. This factor generally only affects the level of the index as it only ranges from 1.0 (no-one has given up) to 2.0 (everyone says they have). It is also important to check that people are quoting legitimate hackney carriage rank waits as some, despite careful questioning, quote giving up waiting at home, which must be for a private hire vehicle (even if in hackney carriage guise as there are few private homes with taxi ranks outside).

The issue of private ranks also has to be considered. If there are supplementary conditions restraining levels of plates that can be active at any rank which are not under the control of the local authority the question of if they should be within the ISUD evaluation arises. The key is that if a location cannot be directly impacted by the council adding more plates, i.e. when there is a third party limit that prevents extra plates servicing that location, then on the basis adding plates would make no difference, this site should be taken out of consideration. However, performance of that rank (which is often a major if not the most important rank in an area) colours the views of the public so it does need to be evaluated in some way.

The ISUD index is the result of multiplying each of the components together and benchmarking this against the cut-off value of 80. Changes in the individual components of the index can also be illustrative. For example, the growth of daytime hour queueing can be an earlier sign of unmet demand developing than might be apparent from the proportion of people experiencing a queue particularly as the former element is based on any wait and not just that averaging over a minute. The change to a peaky demand profile can tend towards reducing the potential for unmet demand to be significant.

Finally, any ISUD value must be interpreted in the light of the sample used to feed it, as well as completely in the context of all other information gathered. Generally, the guide of the index will tend not to be overturned in regard to significant unmet demand being identified, but this cannot be assumed to be the case – the index is a guide and a part of the evidence.

For Brighton and Hove the latest results are shown below, compared to previous years:

Element	2022		2018	2015	2012	2009	2006	2003
	Council only	With station						
Average wait (mins)	0.22	0.25	0.07	0.05	0.18	0.72	0.73	1.11
Peak factor	0.5	0.5	1	1	0.5	0.5	0.5	0.5
% Queues in weekday daytime hours	12	14.9	3.17	14.9	2	7	6	5
% pass in hours with waiting one minute or more	5.1	13.1	0.80	0.88	1.44	5.67	23	35
Latent demand	1.06	1.08	1.169	1.074	1.224	n/a	n/a	n/a
Overall index	6.98	43.82	0.20	0.71	0.32	16	50	97

The table above demonstrates that levels of unmet demand have increased since the last survey although the worst case index (including the station) still lower than values from 2006 or 2003. However, in common with other results around England, latent demand has reduced although people are experiencing longer waits (up to 0.22 minutes for the council only sample, and 0.25 with the station included). Interestingly, demand has now returned to being peaky after not being thus in 2018.

This increase in levels of unmet demand has occurred despite a significant fall in overall levels of passengers using hackney carriages at ranks. This can partly be explained by less vehicles being available arising from driver shortages, but there has also been an impact from the apparent shift of demand to focus on Saturday night – Sunday morning demand. Such peaks are harder to meet with the same level of vehicles.

The impact of adding in the station rank is significant and worsens overall service. However, it must be remembered the extra permit is not in the Council control and other than by making representations, there is little that can be done in this respect.

8 Disability Considerations

Recent surveys for Brighton and Hove have always included additional research to test if there needs to be a further manged increase in the number of WAV style vehicles in the fleet. This is not specifically required as part of the Best Practice Guidance and assessments for Section 16 of the 1985 Transport Act although it is clearly an important element of review of demand, particularly as hackney carriages are the only element of the licensed vehicle fleet that can have stipulations added legitimately.

Since the last survey, more tranches of five WAV plates have been issued. This takes the current level of hackney carriage licences available to 590, with the actual proportion now at 49% of the hackney carriage fleet – some 290 vehicles. In addition about 23% of the private hire vehicle fleet (89 vehicles) are wheel chair accessible by choice.

Brighton has seen an impressive rise in the level of WAV style vehicles in the hackney carriage (and private hire) fleets. In 1997, just 10% of the hackney carriage fleet was WAV. By 2011, this had risen to 25%. It is currently 49%. This is an almost 3% per year increase, mainly achieved by the requirement that all vehicles being replaced must now be WAV style. Since 2019 the private hire level has risen, to a peak of 26% in 2021, although it is now marginally less at 23%.

For this survey, an additional on-line questionnaire was circulated by the Council to people known to have views regarding disability and the licensed vehicle service. This was based on a survey developed by another authority and further developed by LVSA with use in several other recent studies. It has involved change from feedback both from respondents and from each council that we have undertaken the review for.

It is accepted that on-line responses may not be as accessible to all as is preferable, but this survey does provide at least an opportunity for some to respond and give the general flavour. As with all these surveys, the principal promotion of the survey has been from current council sources, which seems to work much more effectively than any other method of identifying appropriate samples of people.

This survey was issued during July and closed in early September. During that period various attempts were made to encourage further response, with a total of 30 responses eventually received. It is acknowledged that this is only one way of seeking response, but it is a clear attempt to engage some views by a relatively direct method currently seeing usage and though the level of response has not been high, each response has been valuable in its own right as a viewpoint that needs consideration.

It must also be pointed out that the small level of response received has to be taken in context of the almost total lack of any regular or sizeable feedback to the licensing section or companies that we are aware of in terms of the significant issues and comments received. However, the comments have been made and there is also a view that any issues or poor service to any customer is a future threat and weakness that needs always to be taken seriously and considered further.

A range of conditions and / or disabilities applied to those responding. 97% identified a mobility issue. Of all those responding, 17% simply stated their prime issue was mobility. 40% of respondents gave two responses, 17% three, 13% four and 7% each gave five or six. After mobility, the next highest score was for 'long standing health condition', followed by 27% each for communication issues and learning difficulties. 17% each said mental health and vision, 10% hearing, with 20% stating six other issues.

Seven possible means of assistance were quoted. All but two respondents gave between one and four responses. 43% gave a single response, 39% two, 14% three and 4% four. The top two quoted was 'a carer with you all of the time when travelling' (43%) followed by 'a wheelchair some or all of the time' (40%) and the same proportion for walking sticks or crutches. 30% said a wheel chair all of the time. 10% said hearing aids and 3% sight aids. None said an assistance dog.

Of those needing a wheelchair all of the time, 44% also had a carer with them. 58% of those in a wheelchair some or all of the time also stated they used crutches or walking sticks. The one person using four assistance aids used a wheel chair some or all of the time, hearing aids, walking sticks and had a carer with them.

For the responses, 67% were occasional users, 20% rare users and 13% regular users of hackney carriages. For private hire the equivalent values were 43%, 27% and 27%. This suggests more from our sample use private hire than use hackney carriages although it is interesting that both the regular and the rare user shares are higher for private hire. This needs to be borne in mind in interpreting the results.

When choosing from four different statements regarding how hackney carriage drivers met respondents current needs, 40% (same for private hire) said they did enough to enable people to travel. One person (3% of total respondents, 10% for private hire) said taxi drivers usually went above and beyond to assist them. However, a third (23% for private hire) felt that hackney carriage drivers did not seem to understand their disability or travel needs.

A further 10% said taxi drivers did not take any reasonable steps to assist them when travelling (7% for private hire).

Six specific comments were added (all quoted verbatim and are therefore the specific views of those quoting):

- Some drivers are very good, others are rude and make things very difficult for me
- It would be helpful if they opened and closed the door for me
- Often drivers try to avoid my job, claiming there is a problem with their ramp. If they do take my job, the often don't seem to be particularly confident with securing my wheelchair so the journey becomes dangerous
- Several have been unsure how to securely restrain my wheelchair
- Sometimes drivers seem unwilling to help and make it obvious they would prefer to be taking an able-bodied person
- Some drivers do not like picking up wheelchair users when flagged at night or at city events
- (for private hire) two said when they obtained a WAV when booking they were usually very good
- (for private hire) one said they were never sure with a booking if the vehicle would be WAV or if it was if the driver would properly fit the wheel chair
- (for private hire) one had an issue with not feeling COVID secure (but they said they rarely used hackney carriage so this is a private hire issue)

People were asked what they thought about the present balance between the availability of WAV and demand for them. Two thirds said there were too few WAV to meet demand. 27% were not sure. The remaining 3% - one person – said the balance was about right. When the same question was asked re private hire the same responses were provided.

People were then asked what they would do if they could not find a suitable hackney carriage when needed. Six options were given plus an open response. One person gave four responses, 10% (three) gave three and 14% gave two, with the remainder giving a single response.

Of those responding, the most frequent said they would wait till a suitable vehicle was available (47%). Next was calling a private hire (30%), then using a less suitable vehicle for which they needed more assistance (20%), use other public transport (13%), calling a friend (7%), and finally getting there under their own steam by walking or using their wheel chair (3%). The 'other' responses were avoiding such situations, feeling stuck and unable to go out, ending up in a panic when out, and three who effectively said they would cancel their plans.

People were asked if private hire operators were meeting their needs. Eight answers were offered, plus the opportunity to say how long people felt they had to book in advance to get the right vehicle. 43% of people said they found that private hire operators were never or rarely able to provide a vehicle suitable for them. 30% said operators usually told them if they did not have a suitable vehicle.

23% (each) said that if people advised operators of their needs they usually found appropriate transport, they were usually able to book a private hire instantly or they did not believe private hire operators made reasonable adjustments. 20% said if they booked sufficiently in advance, their needs were met. These people said they had to book between the day before, a few or two days before, a week, several weeks or a month. However, one said they had been advised that the vehicle was only allocated half an hour before so had been dissuaded from booking. 17% said the service they received was good and the final 7% (two people) said they did not tell operators about their needs for fear of discrimination.

Half just gave one single viewpoint above, but 18% (each) gave two or three, 11% four and one (4%) gave five answers.

If people did not find themselves able to book a private hire, 57% said they would not go to the planned activity or appointment. 30% said they would use a less suitable vehicle meaning they needed more assistance. 27% would wait for a suitable vehicle. 13% would use other public transport. 7% (each) would either call a friend or get there walking or in a wheel chair using their own efforts. Two thirds just gave a single answer with 23% two, 3% three and 7% four.

People were offered choice of eight statements and asked if any applied to them. 42% of those responding gave a single answer, 19% (each) two or four, 12% three and 8% five. 53% of respondents said they had been made to feel uncomfortable by a driver due to their disability. 37% booked through an operator but the driver refused to take them when the vehicle arrived at their pick-up point.

A third said they had been refused travel because they were in a wheel chair. 23% said the operator or driver refused them a journey for reasons they felt were related to their disability. 17% said they were charged extra because of their disability. 13% said a driver refused to take them but not because of their wheel chair or having a dog, but something else related to their disability. None said they had been refused because of an assistance dog travelling with them (although none claimed to have a dog in the initial points).

80% agreed with the current policy that all new and replacement hackney carriages should be wheel chair accessible.

With respect to changes people felt might improve the current provision in Brighton and Hove, all agreed with at least one suggestion (77%), 7% made two, 13% seven and one person (3%) all eight. In terms of overall response by people, 53% said more WAV, 30% (each) said either disability awareness or training, or that any driver found to actively discriminate should have their licence revoked. 23% wanted a wider range of vehicles including those that were not so high off the ground. 20% suggested disability awareness for operators. 17% (each) said both better use of apps or more enforcement action. As noted above, effectively 16% of those responding said all of these, although only one included the loss of licence.

All provided an overall view – 13% said good, 53% satisfactory, 20% bad and 10% dreadful. None said excellent.

Seven (23%) responded to the question seeking positive experiences in other places. One used this to say they had not had a good experience anywhere. They used an electric chair which would not fit into many of the full London WAV fleet, and did not feel safe using a manual chair. Three on the contrary said London was a good example. Others said they had a good relationship with one operator (one was out of town, the other being Uber). The final response was that they felt other places had more private providers, more competition and a better service, but did not explain where.

Others used this question to reiterate need for training whilst another expressed their preference to be able to get a vehicle without having to pre book.

Responses for eleven had been provided by someone else on the persons' behalf. Of those specifically responding, 45% said they were carers, 36% members, 4% unspecified other and 5% a carer and family member.

Other comments added included:

- Feeling that medical exemption certificates were applied to vehicles and not one specific driver of that vehicle
- Concern that if drivers had an exemption they did not then find another vehicle that could help
- Concern about level of wheel chair refusals
- One person explained they felt it hard to ask drivers to wear masks or to close doors they were unable to operate
- Another was trying to use licensed vehicles rather than mass public transport but had received poor experiences from all companies
- One pointed out they felt the questionnaire did not include issues that could be dealt with by training
- One pleaded that more WAV were needed otherwise they felt they were being discriminated against
- One stated everyone should be able to turn up and get a suitable vehicle
- Another explained their recent frustrations with bookings they had made either not coming or being late. They had spoken with drivers and felt they regularly had to plead with drivers to take them, with many claiming exemptions.

Unlike in surveys for 2018 and prior, test phone-calls were not made during this survey. This was principally because it is hard now to obtain a sufficient sample without the survey being identified, given the small number of key players involved particularly in terms of telephone calls. Also, app usage has grown such that phone bookings are no longer necessarily entirely representative.

For completeness, the 2018 paragraphs have been copied as a record of the situation at that time. In 2012, the minimum and maximum quoted wait time for both standard and accessible vehicles was five to 60 minutes. In 2015, whilst the minimum of five minutes remained the same, the maximum reduced to 20 minutes for standard and 30 minutes for accessible vehicles. In 2018, the minimum quoted wait for non WAV was reduced to just two minutes, but the maximum quoted has again increased for both standard and WAV vehicles to 30 minutes, standard, and 45 minutes WAV.

The average wait time was 15 minutes (standard) and 32 minutes (accessible) in 2012. This measure saw improvement for both groups in 2015, with more significant reduction to 19 minutes for accessible (40% decrease) and 12 minutes for standard (20% decrease). However, the 2018 information found that the average for standard had returned to the 2012 level of 15 minutes whilst the accessible average has also increased to 24 minutes, but not back to the levels of 2012. This is counter intuitive given the large increase in available vehicle numbers for accessible customers.

When considering the differences between the four time periods, although overall wait times are longer at night for phoned bookings, the disparity between accessible and standard in proportionate terms is actually lowest at that time. The most disproportionate wait was in fact for those wanting an accessible vehicle during the morning period, when accessible quoted times tended to be three times those of standard vehicles.

The longer 'post 22:00' wait times quoted might suggest that overall there are a lot of hackney carriages who work for private hire circuits who choose to work from hailing or ranks during this period rather than remaining with the radio networks.

The calculation for extra vehicles needed in 2012 suggested the discrepancy was an additional 230 WAV. Undertaking the same calculation in 2015 suggested an extra 139. The 2018 calculation suggests 190 are needed which again seems counter-intuitive given there has been a 22% increase since the last survey in the number of available WAV style vehicles.

Were these additional vehicles all added to the hcv fleet immediately to attain parity of service, this would mean that fleet would be 82% WAV style. However, our observations above suggest that this would not appear to be a sensible option, and that it may in fact not achieve the desired aims.

Further discussion of this in context of other responses and information collected occurs in the following Chapter.

9 Summary, synthesis and study conclusions

This Survey of demand for hackney carriage services 2022 on behalf of Brighton and Hove has been undertaken following the guidance of the BPG and other recent case history regarding unmet demand and its significance. It is the latest in a regular series of reviews of unmet demand, its level and significance and other related issues.

Background and context

This current survey of the level of demand for hackney carriages in the Brighton and Hove City Council area has been undertaken between February and September 2022. The scope of the study has been extended from that undertaken in 2018 to further increase the level of robusticity of the information provided to Councillors, and also (as usual) covers the specific issue regarding issue of five plates per year as well as the aims of how the fleet expansion will be encouraged to occur.

The study is held in the context that overall background transport policy strongly supports development of the licensed vehicle fleet as an important part of the transport offer of the area. Ranks remain seen as key vehicle / people interchanges that enhance neighbourhoods and destinations. Further, the hackney carriage element of the licensed vehicle trade has seen managed growth of some 29% since 1997. At the time of the previous survey, the 25% growth was very similar level to the 29% of growth observed in the, in theory, market-led private hire element. However, the peak of 1,070 private hire vehicles reached in 2020 just before the pandemic has now reduced to 985 vehicles although this now appears steady compared to the first pandemic year decline of 8% in that year alone. This means the comparison of growth from 1997 for private hire now shows just 12% growth in that period compared to the 29% of hackney carriage – implying the increase in the share of the fleet that are now hackney carriage (60% now compared to 57% in 1997).

However, it must be stated that it is known that a lot of out-of-town private hire vehicles operate principally within the Brighton and Hove area albeit for locally based operators appearing to rely on their services.

This survey is the first where there are no hackney carriage only driver licences operating, with the choice being specific private hire only and dual drivers (with the number of the former also having reduced strongly).

The level of WAV in the hackney carriage side has continued to increase, mainly through the policy of new vehicles now having to be WAV style, with the level at last review being some 49%.

The parallel growth of wheel chair accessible vehicles in the private hire side rose from 14% at time of the last survey to 26% before the pandemic, this proportion has now dropped back to 23% with some reduction in the number of such vehicles.

A very important point for this study is that Brighton and Hove remains one of the most regular survey repeaters, with copies of previous surveys every three years back to 2009 remaining available, providing an excellent best practice review of the limit policy and its impacts. This places the area in an excellent place for Councillors to have full information regarding their decisions about the limit policy and related matters. The impact of the pandemic delayed the latest survey by one year such that the gap between the last survey and this has been four years.

National comparison

For this study, the latest national Department for Transport (DfT) statistics for 14 other authorities, as agreed with the council, were compared with specific reference to the level of WAV provision. At the end of March 2022, DfT figures show Brighton and Hove had one WAV for every 1,000 resident population. From the list of 14, only three authorities had higher levels of provision – two of which were very large cities (Liverpool at 2.9 and Manchester at 2.0), both of whom have fully WAV hackney carriage fleets. Plymouth had just marginally more (1.1), also until recently having a fully WAV fleet. The average English value was 0.6 vehicles.

When considering private hire WAV the comparison is even more favourable. Brighton and Hove has the highest provision at 0.32 phv per thousand resident population; four times the English average and over twice the next highest level of 0.15 in Manchester. When considered as a total licensed vehicle fleet, Brighton and Hove is third in the list of 14 with 1.4 WAV per thousand resident population.

This means the total fleet of Brighton and Hove has unrivalled levels of WAV even with no mandatory policy in place. This is a truly remarkable achievement.

Industry Structure

This study also repeats the review of the detailed make-up of the overall industry structure in terms of how it actually works. The industry structure presently allows a wide range of operating models demonstrating plenty of active competition and relatively low levels of restraint in terms of allowing people to make the industry work for them. For example, there are single owner/driver operations both on the hackney carriage and private hire side.

There are a range of company sizes, with and without vehicles, some on the hackney carriage side (without need for operator licences) and others working under operator licences, both with allied hackney carriages and without. There are also plenty of vehicles on both sides available for those not wishing to own a vehicle to rent. This occurs on both private hire and hackney carriage sides of the trade even though anyone can add a private hire vehicle as long as it meets Council standards. At the time of writing this report, new hackney carriage vehicles can be added to the fleet, but with a limit of five vehicles per year.

Comparison to the 2018 survey shows a reduction of 13% in the number of drivers licences to March 2022. In 2022 there were 1,380 different people active in the industry with licences of some kind. Of this around 36% have a driver licence but do not own a vehicle.

Rank observations

Since the last survey, the rail station rank has been moved to the rear of the station, leaving the covered forecourt available for pedestrian footfall only. Further, the St Peter’s Church rank has been moved to be adjacent to the church rather than on the gyratory to the north.

For this survey, an initial test was undertaken at the top two council ranks to see if there was any evidence that unmet demand levels might have tended towards becoming significant since the last survey. They also provided a test of demand early in the calendar year. These surveys suggested demand was 16% lower in the March of 2022 than had been found at the top site in March 2018. Neither site saw much unmet demand, giving suggestion both that high unmet demand was unlikely but that reduced overall patronage of ranks was now also highly likely to be identified by the main surveys.

However, detailed review also found that Friday flows were down but that Saturday flows at the main rank had increased by 81%. This also implies that local passenger demand may have moved to being more peaky now than in 2018 (when the overall conclusion had been that demand was no longer peaky).

The full surveys were undertaken in May 2022 using a similar sample to that in 2015, but with added comfort, as in 2018, provided by several sites being watched on an extended basis albeit in a less detailed manner (i.e. principally by observing when the rank was active, and simply recording passenger numbers rather than full detail for these additional hours).

Overall results found a reduction of observation of passengers at ranks in the area since 2018 amounting to some 25% (over four years). The reduction from 2015 had been 27% (over three years) suggesting that despite the pandemic ravages, overall passenger decline had in fact been marginally slower which is in fact remarkable.

The largest reduction in usage arose at the private rail station rank, again for the second survey running. The table in the earlier chapter shows estimated rail passenger numbers using hackney carriages have reduced 59% from last survey to this, but on top of 32% between the previous two surveys (net reduction of 72%). This reduction accounts for the bulk (87%) of the overall reduction in patronage.

East Street is now the busiest rank, providing 43% of the total estimated weekly passenger demand. Queens Square and West Street also both saw increased levels of actual passenger usage and share. The hospital rank has seen nearly fourfold growth and has risen from ninth to sixth in the rankings.

Hove Station rank saw 12% decline (more consistent with drops in national rail usage) (see further below) whilst St Peter's Place share dropped to 3% from a previous 9%. Following national trends, the three smallest ranks continued their survey on survey decline.

Consideration of the total passenger demand profile now suggests the Saturday evening / Sunday morning flows imply the overall profile is now (once again) peaky after not being so in 2018.

Present flows see the busiest five ranks now accounting for 89% of all passenger demand during the survey period and 85% of the estimated weekly demand.

Brighton and Hove remains a location where there is always some hackney carriage activity at ranks through the week. Our present survey found highest flows on Saturday, with marginally lower levels on Friday, and lower, but still significant levels of usage on Thursdays. Further, additional cover is provided in many locations from vehicles passing by, although any rank just off any main through route always sees regular vehicle pass-throughs even at the quietest times, suggesting the area is well-served by hackney carriages making themselves available for hire. This is a key, important and best practice factor of the local hackney carriage trade.

In terms of service to passengers, the 2022 survey sees 9% of observed hours with average passenger delay of a minute or more (just 2% in 2018). A further 16% of the observed hours (7% in 2018) saw average passenger delay that was not zero.

However, in context, even with this generally increased level of delay to passengers observed, only 33 people in 14 different hours actually experienced a wait of 11 minutes or more for a hackney carriage to arrive at a rank. There were only three recorded passenger waits over 20 minutes, the longest being 26 minutes in the 01:00 hour on the Sunday (but at what is now a relatively quiet rank). The shortest of these three (just over 21 minutes) was at the station.

During the busiest survey day, 45% of the fleet was observed meeting the demand surveyed. This leaves plenty of spare capacity available to meet increasing demand levels and is marginally higher than in 2018, although we did add an extra observation period. A test by time period found generally more vehicles from the fleet active in 2022 compared to 2018 apart from the 22:00 to 23:30 period which saw reduced levels of activity.

These observations also suggested that of all registration plates / plate numbers observed, 69% were local hackney carriages, 15% local private hire, 3% Uber, 7% Lewes and 6% Chichester. This 13% out of town is a large increase from the estimated 4% in 2018.

The overall surveyed level of abuse of ranks by other vehicles in the area was low but increased from 2018. The largest group abusing rank locations, for 8% of observations, was cars. This is a national trend possibly arising from people getting used to using their private vehicles more during the pandemic and at the same time finding less hackney carriages using ranks. This is particularly true for smaller ranks, with the Old Ship and Mash Tun locations worst affected. There is a linked issue that overnight enforcement of parking tends to have strongly reduced but it is clear that a zero tolerance approach needs to be followed and encouraged with the Council enforcement teams as a significant matter of public safety.

Observed use by people in wheel chairs was just three in this survey (six in 2018). However, 54% of vehicles observed at ranks were understood to be WAV style, higher than the 49% in the fleet.

On street public views

The generally census-consistent sample of people interviewed in the streets across the area suggested a similar overall usage of licensed vehicles to seven years ago, 32% (33% in 2015 but 16% in 2018). Of all respondents 32% also said they had used hackney carriage only, 21% private hire and 9% both types of vehicle in the last three months. A higher proportion, 88% (72% in 2018) were from the area.

Overall licensed vehicle trips per month were estimated at 1.8 (0.49 in 2018) per person per month, with the level 1.4 (0.16) for hackney carriages, showing 78% (33%) of trips were now made by hackney carriage, compared to nearly nine out of ten in 2015. This suggests overall usage of licensed vehicles and particularly hackney carriages is up from four years ago in the minds of people.

The hackney carriage fleet remains very visible, although the level of those not remembering when they had last used a hackney carriage had continued to increase from 5% (2015) to 21% (2018) to 47% this time. The level of people saying they could not remember seeing a hackney carriage remained almost everyone (this time one person said they could not remember, none said this in 2018).

45% claimed they principally got licensed vehicles from ranks (32% 2018, 36% 2015), with 9% (19%, 2018) who said they now used an 'app'. Telephone use was up (45% compared to 40% in 2018) but hailing reduced to 3% (6%) and no-one said they used a freephone at all this time (3%).

The top two companies were operators of mixed hackney carriage and private hire fleets and this time obtained equal mention (33%) whereas in 2018 they had received 49% and 18%. The next two companies obtained 11% and 10%, the latter being a national app company who had received 13% of contacts in 2018 (so marginally reduced this time). It is interesting app usage both in absolute share and in terms of use of the app company appears to have reduced, albeit marginally.

Whilst 63% of respondents quoted ranks they knew, 53% said they would use the named ranks. A similar number of names were given to 2018 (20 compared to 22), with a much larger percentage naming the Station Rank (54% compared to 27%, but 56% said they did not use it). 20% (17%) named Churchill Square in various guises, 18% East Street (much increased from the 5% of 2018). Neither the 9% for George St Hove or the 7% for North Street were mentioned at all in 2022.

The ratings given for the various aspects of the service focussed on 'very good'. Even price saw 33% of response that it was 'very good' despite having the highest level of 'very poor' response. The key item that would increase usage was if hackney carriages were more affordable.

Latent demand had marginally decreased from 8.6% to 8% at ranks.

The statistic regarding need for WAV had changed from a level of 89% not needing them in 2018 to 80% now not needing them, meaning 20% had some kind of need or knowledge of those needing WAV (i.e, an increased need for adapted vehicles). The result focussed on WAV styles rather than other adaptations.

78% (70% 2018) felt there were enough WAV hackney carriages.

For the small 18% of respondents giving an answer to activities they were totally reliant on hackney carriages to undertake, 55% confirmed there were no such activities. Top response with 33% was nights out, then 21% hospital visits, 13% holidays and 8% airport trips.

When asked about changes in usage of licensed vehicles from before the pandemic to now, and now to three years hence, the balance from pre-COVID to now was 13% down for hackney carriage but 2% up for private hire, looking forward 6% would in future expect to use more hackney carriages and 5% private hire.

With respect to COVID security, the 65% response rate suggested this remained of importance. Top were that the vehicle had been visibly cleaned followed by having a screen.

Key stakeholder views

Key stakeholders provide much less response nationally now than pre-Covid. Three responded despite more effort being made – none said customers used ranks and just one said there were issued but provided no more information.

National information suggested Brighton rail passenger flows were 76% down for the first year including the pandemic impact.

Trade views

An excellent 19% level of response was obtained to the main all-driver survey. Further, one representing body for the trade also made positive and good contributions to this Report. This is an encouraging level of engagement across the industry. Normal responses are significantly lower and 5% is usually counted as good.

85% of those responding said the licensed vehicle trade was their only or main source of income. The split between hackney carriage and private hire saw 60% this time from hackney carriage, reduced from the 81% of 2018.

The working week was reduced in number of hours (39% from 43% in 2018 for hackney carriage and 32% from 41% for private hire). However, more worked six or seven days though more had not worked, resulting in a corresponding reduction in average days worked.

The level of those responding who were owner-drivers reduced very marginally to 73%. A much reduced 20% (from 52%) said they shared a vehicle.

Most people said they now worked mainly around family needs, up to 37% from the 22% of 2018. Other factors reduced accordingly. 5% said they avoided disruptive passenger operating times.

The level of use of pre-bookings was up from 66% to 77% now.

The top rank quoted as used was East Street with a similar level of 20% of responses. Use of the station rank fell from 15% in 2018 to 7% now. A wide range of ranks were quoted, about the same as in 2018.

Just one respondent took time to request that the current managed growth policy level of increase was switched off until the next survey although it is accepted that the specific question regarding managed growth and support of the limit was not directly asked this time given that the previous responses were not decisive.

65% of those responding to the question considered the limit had public benefit but the range of points was wide. A key focus was that more plates would make it harder for them to make a living leading to worse public service. A key specific (7%) was ensuring congestion did not worsen through more vehicles being added. Others said it ensured more chance that people would know their drivers. 70% of those in favour were hackney carriage drivers with 26% of private hire also in favour. One hackney carriage driver opposed the limit because they wanted their own plate.

86% felt there were enough hackney carriages including many private hire and 90% felt there were sufficient wheel chair accessible style vehicles in the fleet.

There was very strong agreement the pandemic had been a major issue to their businesses. Some, however, did feel things were returning to normal although they were a minority.

When asked about barriers to moving to more sustainable vehicles a key element quoted was cost (43%) followed by 17% saying it reduced trade viability. 5% were of the view sustainable vehicles were not suitable for service as licensed vehicles and 4% were concerned about lack of infrastructure. Some did make positive suggestions how this move could be eased including grants, subsidies and other ideas.

With regard to how the council could encourage more drivers to return to local licences most agreed it was necessary but few had practical ideas how it could be encouraged.

The general comments focussed on need to reduce the level of out of town vehicles active, and in many cases other development of the industry was felt to be dependent on this being resolved first.

The formal trade response confirmed they felt the present level of WAV in the hackney carriage fleet was now correct. Out of town vehicle activities were a major concern, and they felt this was an impact on public safety. They were aware the wish of drivers to own plates was an emotive issue.

Formal evaluation of significance of unmet demand

The present ISUD index suggests that the level of service to the public has declined since the last survey. However, the level of unmet demand is not significant but the change in trends has generally been towards worse service – in 2018 the index was 0.20 (80 suggest significance of unmet demand that should see more plates), it is now just under 7 (or just under 44 if service to the private station rank is included).

Disability issues

Rank observations found 54% of observed movements at ranks were apparently WAV style, a much higher proportion than the 49% in the fleet at the time of the surveys. The level of observed usage of people in wheel chairs using hackney carriages at ranks was very similar to that in 2012 and 2015, being this time some three people. There was a much higher level of apparent disabled usage for those with non wheel-chair required disabilities.

In terms of being aware of others needing adapted vehicles, the level has increased from both 2015 and 2018, when 96% said they did not need a vehicle, this is now some 80% suggesting more people now need such style of vehicle. The level needing a WAV in this proportion however was now almost all for WAV rather than other adaptations.

A very detailed questionnaire found response from some 30 people with a range of quoted disabilities. A lot of summary detail is provided in the chapter above for future thought and consideration.

However, only 13% were regular users of hackney carriages and 27% regular users of private hire.

For both hackney carriage and private hire 40% said they felt drivers did enough to enable them to travel. However, 23% for private hire and 33% for hackney carriage felt drivers did not understand their needs. Few suggested any other places that provided better service apart from some saying London (but one person disagreed strongly re London service).

There were some concerning comments arising, particularly related to use of exemptions as a reason to refuse their journey even if the vehicle was wheel chair accessible. However, private hire bookings often fared as badly with refusals made on arrival, or lack of fulfilment for bookings made. However, there were many positive comments also made within the responses.

What is concerning is that none of these issues have ever been reported to the Council licensing team directly.

Synthesis

Although it is clear that the pandemic has impacted both demand and supply sides of the service to the public, the general trend of reduced demand for hackney carriages at ranks has remained at about the same pace as before the pandemic. However, there are very heartening changes within this apparent decline, and a high proportion of the loss for this survey comes from the reduction in usage by rail station passengers at Brighton station. Whilst some of this may be due to continued depressed rail travel levels, some is also due to the move of the rank from the front of the station. This impact is further highlighted by the strong difference in service level resulting if the station is included in the ISUD value.

The other issue contributing to the worsening ISUD passenger service statistic in this survey is reduced service to some of the quieter ranks; matters have also worsened as demand in 2022 has returned to being 'peaky' which makes serving the public harder for the same level of fleet size. It is also clear that some drivers have not returned to the industry, either retiring or finding preferable work, and that others have chose to focus on a better lifestyle – work balance.

The issue of out-of-town vehicles remains a strong perceived negative impact on the current trade and means many feel this issue needs to be solved before other potential improvements (such as move to more sustainable vehicles) can be taken forward seriously. We have found evidence that the level of such vehicles is probably similar to the level of local private hire. However, the public do not appear aware of the issue. In fact, the public have improved their views of the worth of waiting for a hackney carriage at a rank if one is not there – a national response we are seeing in many surveys (latent demand factors are reducing, despite longer waits).

Part of the issue with the lesser used ranks is their abuse by significant numbers of private vehicles. A zero tolerance policy is needed for non-Brighton hackney carriage vehicles using ranks, even for short periods. This however is beyond the remit of the licensing authority and needs strong joint action from the traffic enforcement sections of the Council. This is important because abuse of ranks has strong safety implications around those ranks, with passengers and other public put at risk from poor and dangerous traffic operations.

Evidence of poor experience was found from the detailed WAV user survey but this is partly countered by the fact that very few if any complaints get through to the licensing section.

The fact that all aspects of the passenger service index (Index of significance of unmet demand, ISUD) apart from the peakiness factor and latent demand factor have worsened strongly suggests the managed growth of plates needs to continue to ensure that stronger action (increased new plate numbers) are not needed further forward. However, there is concern that the new plates are now taking longer to bring forward possibly because of the cost of bringing either new WAV or sustainable vehicles into the fleet. This may need further thought on both process and requirements.

There is need for strong review of what legal and other options exist for the licensing authority to oppose service to the public of Brighton by those with no ready ability to be enforced against. This is not, however, a simple matter and might be best tackled by promoting the high quality of both local hackney carriage and private hire service whilst highlighting the negative aspects of non-local services. This may need to draw on the resources of the authorities who appear to allow their vehicles to benefit from such operations.

Whilst the issue of moving to more sustainable vehicles is clearly one that must be moving forward, the overall context of this for the current trade must be carefully understood and focus put on encouragement towards change, but also on education and real experience sharing of what can and cannot be achieved and when.

10 Recommendations

On the basis of the evidence gathered in this Survey of demand for hackney carriages services for Brighton and Hove, our key conclusion is that there is no evidence of any unmet demand for the services of hackney carriages either patent or latent which is significant at this point in time in the Brighton and Hove licensing area. The committee is therefore able to consider retaining its present limit on hackney carriage vehicle numbers and to be able to support this against any challenge if required. The strong negative changes in the ISUD index imply the managed growth remains important.

The options open to the committee therefore include the following:

- Retain limit at current level, removing the managed growth
- Continue managed growth for WAV
- Revise managed growth to switch to focus on environmental matters rather than WAV
- Remove the limit altogether (with various possible options from with no further restriction to quality controls such as in favour of environmentally friendly vehicle options).

At the same time the related policy regarding all replacement vehicles having to become WAV also needs reconsideration.

Further thoughts are provided in the previous chapter giving reasons why particular options might be preferable at this time. Further discussion can occur at the presentation of this report if necessary.

There needs to be much more public and trade debate about the issue of disability service across the licensed vehicle service. The trade needs to identify clearly what they consider to be good service to those with disabilities and ensure this is communicated to the public and those contravening the code of practice see strong discipline applied preferably from within the trade as well as by the licensing authority.

This could perhaps be led by a marketing campaign encouraging both negative and positive feedback regarding the full licensed trade operation to be regularly shared by people. This could also draw in the issue of non-local vehicle service to the public.