Torridge District Council

Survey of demand for hackney carriages

October 2022

Executive Summary

This survey of demand for hackney carriages has been undertaken on behalf of Torridge District Council 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.

The 2022 survey, the latest in a series of tests of the level of unmet demand, saw the bulk of survey work in May/June 2022 at a similar time to previous data collection. The present relatively small overall licensed vehicle fleet has a complex operating structure. Three of the fleet specifically work the niche Clovelly Taxibus service. Excluding these vehicles, the principal publicly available operating section are the 19% of the total licensed vehicle fleet that operate for five mixed hackney carriage / private hire companies. 18% (was 17%) of the fleet are independent hackney carriages. 28% of the fleet are in pure private hire vehicle only companies. The final 28% (increased from 22% in the previous survey) of the fleet are mainly used on non-public contract work. The upshot of all this is that 52% of the total licensed vehicle fleet are available to the public at the main rank in Bideford whilst 54% of the entire fleet are directly available by phone.

The overall view of the current status of the licensed vehicle trade in Torridge remains generally positive. The pandemic appears to have taken away the relative stability of demand seeing 40% less demand now at the only rank (although a similar drop in demand occurred from 2012 to 2016). It is accepted that the main night demand generator had not re-opened at the time of the survey. Resulting average passenger levels are just nine passengers per hour from the rank although peak demand remains on Friday and Saturday nights. The level of vehicles servicing the rank appears to have reduced from 83% in 2019 to 64% now, with two plates no longer in use the actual number of vehicles is reduced more than that statistic suggests.

Unmet demand for hackney carriages is now occurring more despite the reduced overall level of demand. This is because supply to the rank has reduced more than the demand has particularly on Saturday evenings. Despite this, public views of the service have significantly improved. 14% of respondents said they were dependent on licensed vehicles for trips, with 24% of these people using them for hospital visits, 19% for the weekly shop, 14% for nights out and 10% to visit friends and relatives.

The well-supported driver survey found just three hackney carriages whose principal work was from ranks, most said rank demand provided between ten and 35% of their work. Most drivers now chose when they preferred to work against other reasons. Half the responding hackney carriages said they service the rank. The limit remained supported across the trade and many said it provided a better service with a focussed number of drivers and better remuneration allowing higher vehicle standards and maintenance than a free market situation would predicate.

It appears that the revision of demand has allowed many more to achieve their required level of remuneration during the week compounding the lower Saturday night demand impact seeing even less vehicles active then. The number of hours of very low (thin) demand has also increased and much of the unmet demand occurs at these times when it is very hard to match supply and demand cost-effectively. However, 53% of all observed passenger delay occurs from 17:00 Saturday to 0159 Sunday – despite an estimated peak vehicle need of no more than ten to adequately service that demand.

Taking all evidence into account, the present hackney carriage service seems to be in a relatively healthy position, providing public benefit arising partly from the limit policy. The 'new normal' does not yet seem to have achieved a balance between driver operating practice and passenger demand which leads to the industry standard analysis suggesting significantly poorer public service, yet with actual public views suggesting they are generally happier with the overall service now.

The only recommendations for improvement of the overall service are a possible need to consider higher night fares and a reminder to the hackney carriage trade that their principal objective is serving the rank, even if this is at times when demand there is low. This covers both the Saturday night period but also the early mornings.

There needs to be an honest discussion with drivers whose apparent focus on lifestyle choices is possibly reducing supply at times when demand – although reduced – still needs more vehicle active than are presenting themselves. Were it to become clear there was an unwillingness to service such demand, it may be necessary to either issue more plates or remove the limit to allow others to service the observed demand. However, it should also be remembered that with overall low demand such an action might be counter-productive removing many experienced players who might consider the remuneration insufficient to continue their involvement.

To reiterate, at this time we would not recommend any other action than ensuring any plates not on issue can be reissued and a reminder that hackney carriage plates are issued to service the public ranks available.

It may be that the re-opening of the main night demand generator could draw more drivers and improve the overall situation, but it may also be prudent to test levels of service provided within three months of the re-opening of that venue to identify if a sufficient balance to protect public safety had been achieved. Sufficient service to that venue is important to ensure its future is enhanced by the ability of patrons to get home safely.

Contents

1 General introduction and background

Torridge District 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.

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 (TPCA), 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. This latter Act saw application of regulation to the then growing private hire sector which had not been previously part of the TPCA. 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 vehicle' to refer to both hackney carriage and private hire.

The legislation around licensed vehicles and their 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 current BPG in fact says "most local licensing authorities do not impose quantity restrictions, the Department regards that as best practice".

The most recent reviews were by the Office of Fair Trading in 2003, through the production of the BPG in 2010, the Law Commission review which published its results in 2014, the Parliamentary Task and Finish Group which reported in September 2018, the Government Response in February 2019, the consultation on "Protecting Users" which resulted in the issue of the "Statutory Taxi and Private Hire Vehicle Standards" (STPHVS) on 23rd July 2020, and the most recent consultation on the wider revision of the 2010 Best Practice Guidance, the results of which are due imminently (but with no date yet given).

None of these resulted in any material change to the legislation involved in licensing and specifically with respect to unmet demand and vehicle limits. Other groups have provided their comments (including the Urban Transport Group and the Competition and Markets Authority) but the upshot remains no change in legislation from that already stated above. There have, however, been two new Acts enacted in 2022.

The Taxi and PHV (Disabled Persons Bill) Act 2022 further strengthens the requirement on drivers with regard to the council listing and seeks to ensure disabled people can use taxi and PHV services with confidence they will not be discriminated against. It was made active in April 2022.

The Taxi and PHV (Safeguarding and Road Safety) requires all authorities to share information about drivers and was made active on 31st May 2022.

The STPHVS required update to be provided to the DfT by early 2022 in regard to:

- Production of a comprehensive policy document
- Review of CCTV mandation and value
- Documentation of passenger complaints.

Limitation Policy

With respect to the principal subject of this survey, 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. It is assumed the Government response to the Task and Finish Group and the consultation on the revisions to the BPG 2010 is now effectively the current reaction to this extensive research.

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.

Review of unmet demand

After introduction of the 1985 Transport Act, Leeds University Institute for Transport Studies developed a tool by which 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.

This tool effectively summarises the level of service to the public in the form of an index taking into account various elements including average passenger delay (APD), proportion of non-peak hours with APD a minute or more, proportion of all passengers travelling in hours with APD a minute or more, a seasonal factor, a peakiness factor and a latent demand factor. Where the index result is 80 or more this is taken to denote that the observed unmet demand result is significant. It must be remembered that the index is exponential so it can quickly increase as values deteriorate in the direction of unmet demand growth.

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. However, the three-year survey horizon has become generally accepted given the advice of the BPG and most locations that review regularly do within that timescale.

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).

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". This BPG applied at the time of the undertaking of the surveys for this study.

Recent Changes

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).

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. There remains no confirmation of any timetable for instigating either the remainder of the Equality Act or the Law Commission recommendations, or for the acceptance of the consultation results on the update of the BPG. The two 2022 Acts revising driver records and disability discrimination in more detail were listed above.

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 (but specifically do not mandate in any way) that the determination of conclusions about significance of unmet demand should take into account the practicability of improving the standard of service through the increase of supply of vehicles.

It is also felt 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, and certainly no mandatory nor significant court guidance in this regard.

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. The Government has broadly supported the recommendations of this Task and Finish Group.

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. This latter option is now being taken forward in Scotland, with two studies published and the Scottish Government preparing guidance, although the Government response did not support this option.

As already stated, other groups have provided comments giving their views about licensing matters but the upshot remains no change in legislation from that already stated above.

Policy conclusion

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. Further, the jurisdiction focusses on the vehicles, drivers and operators but rarely extends to the physical infrastructure these use (principally ranks).

The vehicles 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. 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.

Cross border issues

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.

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

2 Local background and context

Key dates for this survey of demand for hackney carriages for Torridge District Council are:

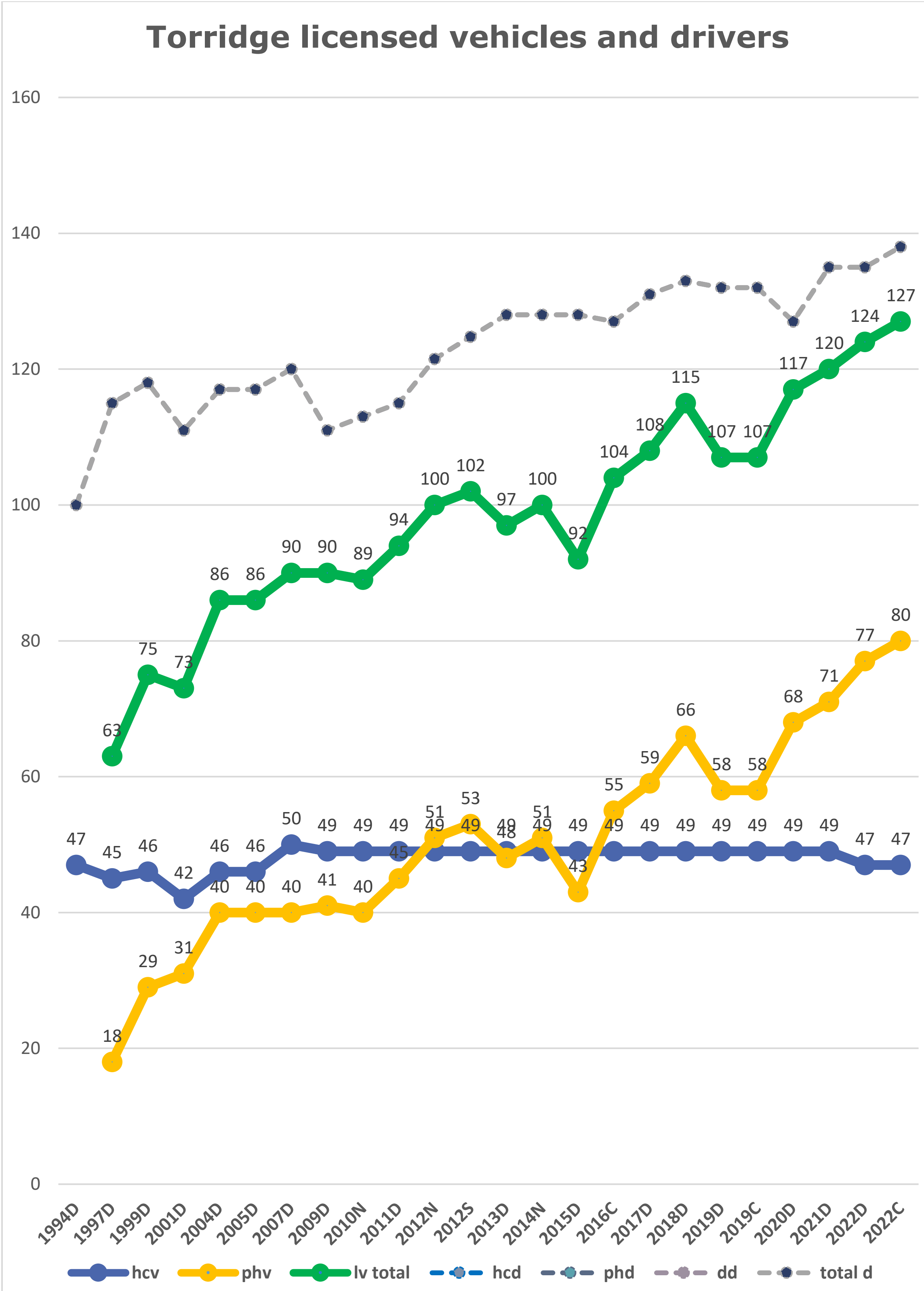
- appointed Licensed Vehicle Surveys and Assessment (LVSA) on 7 April 2022
- in accordance with our proposal of February 2022
- as confirmed during the inception meeting for the survey held on Monday 11th April 2019
- this survey was carried out between May and September 2022
- On street pedestrian survey work occurred in May 2022
- the video rank observations occurred in mid-May 2019 (in a non-bank holiday week)
- Licensed vehicle driver opinions and operating practices were canvassed by an all-driver survey undertaken through June and July 2019
- Key stakeholders were consulted throughout the period of the survey
- A draft of this Final Report was reviewed by the client
- and reported to the appropriate Council committee following acceptance by the client of the report.

Torridge is a District Council, and in terms of background council policy able to provide inputs to the higher-level Devon, County authority. However, it does not have direct authority over either rank provision or transport policy. The authority is part of an informal Licensing Officers Group for the County.

The authority has a current population of 68,100 (2021) using the initial results from the 2021 census. This is lower than the estimated 69,754 for 2021 from the 2011 census projections.

Torridge District Council has chosen to utilize its power to limit hackney carriage vehicle numbers, and as far as we are aware has done so since 2001, with one issue of extra plates. This issue was a very specific three vehicles provided for the operation of the regular service provided by the Clovelly Estates taxi-bus service which partially operates on public roads and therefore was deemed to require hackney carriage licences. These vehicles are very specifically tailored to this service and are very unlikely ever to see usage at the rank in Bideford.

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.



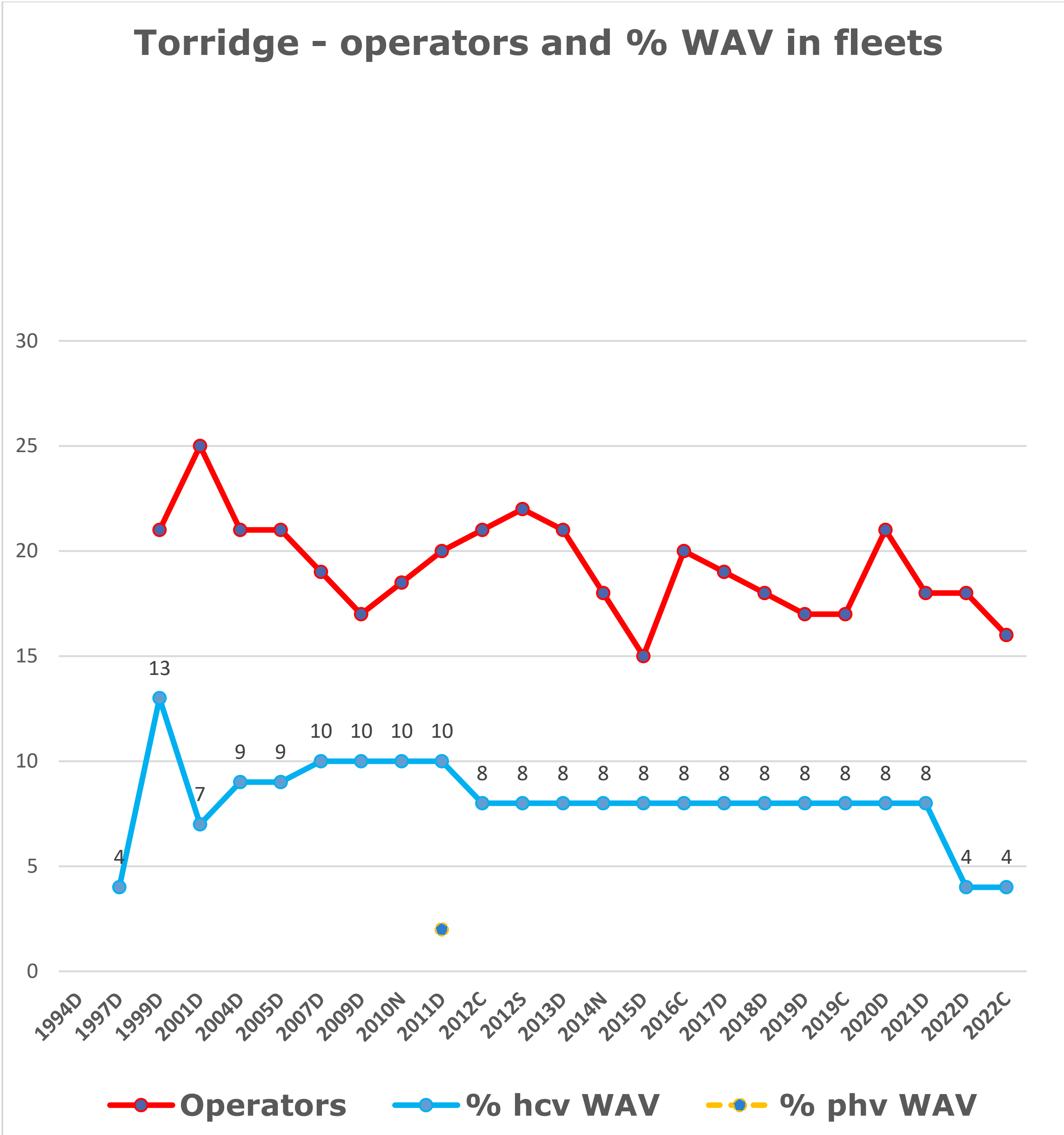
Licensing Statistics from 1994 to date

The graph above shows a general increase in the level of private hire vehicles in the area with a dip around the time of the last survey but continued growth since then. This is understood to be related to vehicles working on education contracts. For the first time since 2007 there have been two hackney carriage plates no longer actively on issue.

It is only really since 2015 that there has been more private hire in Torridge than hackney carriages. That difference in numbers has now become significant and seems to reflect the principally rural nature of the area where a high proportion of trips are almost certainly booked – and with the experience of attempting to generate other ranks – seems to be confirmed that the hackney carriages principally meet the Bideford urban demand. However, other evidence presented below suggests that the bulk of at least Bideford licensed vehicle demand is met by hackney carriages or private hire companies with a mix of both hackney carriage and private hire vehicles in their fleets.

Drivers in the area have held 'dual' licences since statistics were first made available, meaning they can drive either hackney carriage or private hire and the general trend in numbers continues to be upwards, albeit with a slight drop around the last survey. However, it is not possible to compare driver numbers to specific vehicle types given their dual status.

Information is also available from these sources to show how the level of wheelchair 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 wheelchair 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.



Operator numbers and levels of WAV provision in the fleet

This graph shows the level of wheelchair accessible vehicles (WAV) reduced around 2011, remained static at 8% but most recently has dropped to just 4% (the two hackney carriage vehicles whose plates were handed back were WAV style).

To put this value in context, in the DfT 2022 statistics there were 280 English licensing authorities excluding London. For these, the average level of hcv WAV is 40%. However, of these, 58 had 100% WAV hackney carriage fleets. A further 16 had no hackney carriage WAV in their fleets at all. If these are excluded, the average WAV level reduces to 22% for those with mixed WAV / non-WAV fleets.

From this sub-set, 21% of authorities have 3% or less WAV; 6% have 4% (same as Torridge), 73% have 5% or more WAV in their hackney carriage fleets. The DfT action level targeting encouraging increased WAV percentages is at present 5%. All these suggest Torridge in a more favourable position in regard to WAV levels than at first sight, though the halving to just two vehicles is of concern.

Private hire operator numbers have been showing a general decline since a peak in 2012, although there was a larger drop to 2015, an increase but then steady decline since. However, overall numbers of operators are low given the small size of the total fleet. This still provides significant levels of competition albeit between the relatively small companies, many of which have mixed hackney carriage and private hire vehicles.

Torridge undertakes regular review of its policy to limit hackney carriage vehicle numbers in line with the BPG. The previous surveys were in 2019, 2016, 2012 and 2008, with a rank demand review only undertaken in December 2017.

Fleet structure

Details were obtained of the overall structure of the licensed vehicle fleet in the District. The statistics below ignore the very specific three hackney carriage vehicles operating the Clovelly taxi bus service.

There are 16 private hire companies covering the 80 private hire vehicles. 44% (40% in 2019) of the private hire fleet is allied to a company which undertakes principally contracts and which also operates psv sized vehicles, and has none of its vehicles readily available to the public for direct public hire.

15% (14% in 2019) of the private hire fleet are one or two vehicle companies who are therefore limited in their operations. There are two other pure private hire companies that account for 17% and 14% of the fleet (was 15% and 5% 2019).

The remaining 10% of the private hire fleet operate for five (was six in 2019) companies all of whom also operate hackney carriage vehicles, i.e. mixed fleets. These companies range from two to 12 vehicles, with the top two having eight and 12 vehicles in total respectively, both of whom also have booking offices in Bideford centre, one very close to the rank and the other a little further away.

These mixed vehicle fleets account for 32% of the hackney carriage fleet. There are three hackney carriage only fleet agglomerations accounting for 17% of the hackney carriage fleet. This leaves 51% of the hackney carriage vehicle fleet operating fully independently.

Overall, 17% of the total licensed vehicle fleet can operate at ranks, but if the large non-public fleet is removed from the overall total, this proportion rises to 52% of the public available fleet (and would be higher if all on-publicly available vehicles were excluded). Again, this strengthens the potential for the public to see principally hackney carriages when using licensed vehicles.

In summary (of the full licensed vehicle fleet):

- 28% (was 22%) of licensed vehicles are contract only
- 19% are in mixed private hire / hackney carriage companies
- 7% are in pure hackney carriage only agglomerations
- 28% are in pure private hire companies
- 18% are independent hackney carriages
- At least 52% of the publicly available licensed vehicle fleet are hackney carriages

Further discussion of the implications of this relatively complex fleet structure are provided in the synthesis section of this Report.

3 Patent demand measurement (rank surveys)

As already recorded in Chapter 2, control of provision of on-street ranks in Torridge is the responsibility of Devon County Council, who typically work with the District to implement or modify ranks.

Our methodology involves a current review both in advance of submitting our proposal to undertake this survey of demand for hackney carriages 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). Detailed results by rank, day and hour are in Appendix 2.

Since the last survey, rank provision has remained focussed completely on the main rank in central Bideford on the quay side, which is supplemented from midnight to 06:00 by additional spaces on the town side of the road. The extra provision along the Harbourside is no longer available.

For completeness, over the years there have been a number of attempts to encourage further rank provision both across the District and within Bideford but none of these have been successful. The Holsworthy Square rank was removed by the County authority for lack of use some years ago. Bideford locations in Bridgeland Street and more recently near the Quayside Café have not seen any usage. Much of this relates to the level of demand required to encourage development of active ranks which is supplemented by lower demand locations seeing service in response to customers calling for vehicles, many of which are actually hackney carriages operating for private hire. This tends to be a much more business effective way of operating both for the driver and the customer, although the typical response time for a passenger will tend to be longer than just turning up at a rank that is active.

Our observation of the Bideford rank takes account of both the 24-hour and night location, and follows any change in operation that occurs between the two different layouts.

The rank was observed using video methods with fully trained staff and analysis tailored to provide details of the usage of the rank with waiting times summarised by hour for both vehicles and passengers. Passenger waiting times relate to true unmet demand, i.e. when passengers arrive to find no hackney carriage vehicle available for immediate hire or any queues built up following such incidents.

Daily data was used to produce an estimated weekly demand level as shown in the Table below:

Rank	2022	2019	2017 (Dec)	2016	2012	2008
Bideford	1,180	1,958	2,032	2,339	1,652	2,013
Quayside Café	Unobserved	Unobserved	Unobserved	7	Not there	Not there
Holsworthy Square	Gone	Gone	Gone	Gone	10	Unused
Total Demand	1,180	1,958	2,032	2,346	1,662	2,013
Comparison to previous year	-40%	-4%	-13%	+41%	-17%	

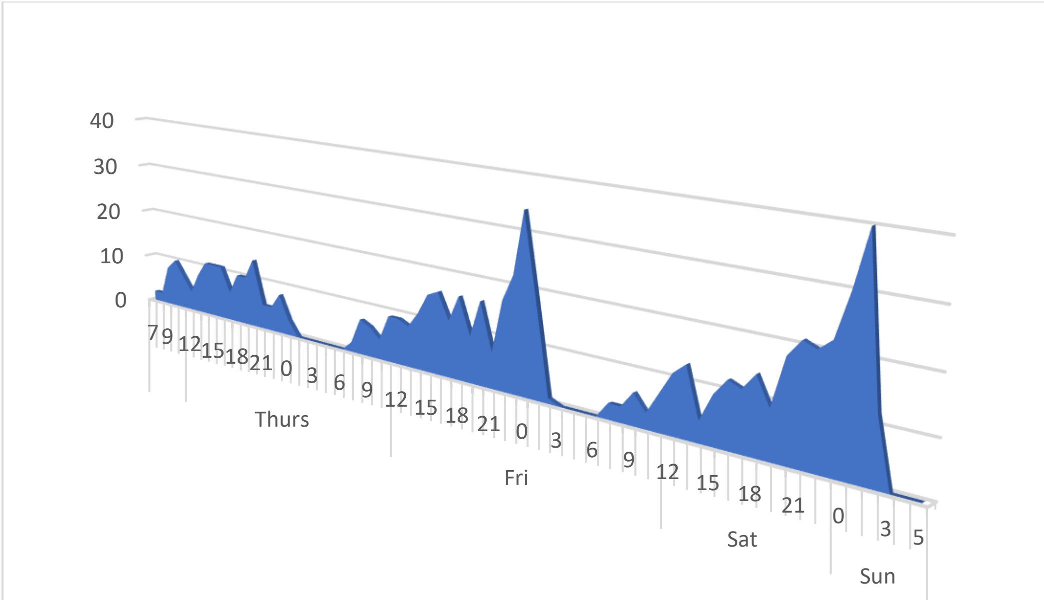
The table shows there are an estimated 1,180 passengers per week leaving the Torridge rank provision in a typical week. This is 40% less than the information gathered in a similar month three years ago.

The table below considers passenger numbers for each of the days actually observed.

	2020	2019	2017 (Dec)	2016
Thursday	135	218	230	Not observed
Friday	238	306	435	289
Saturday	268	520	451	533
3-day total	641	1,044	1,116	n/a

The table shows the general trend of a 40% reduction does vary by day. Thursday is closest to the average whilst Friday flows are down 22% and Saturday 48%.

The hourly flows for the 2022 survey are shown graphically below:



This graph shows that the overall demand at the rank remains with a sharp peak on both Friday and Saturday nights, after both demand drops to a very low level. There is no usage of the rank in the 01:00 to 05:00 hours on Friday, 03:00 to 06:00 on Saturday and 04:00 to 05:00 on Sunday, further confirming the concentration of rank usage towards the weekend days. Compared to 2016 when the peak flow was about four times greater than the average, 2019 at over 4.5 times, the 2022 peak flow is 4.4 times the average. Average rank demand now, at 9 (down from 19 in 2016 and 14.5 in 2019) passengers per hour. The peak flow of 40 in the 01:00 hour on the Sunday is much lower than the 67 observed in 2019.

Rank usage by other vehicles

Some 1,229 different vehicle movements were observed at the rank during the three days of observation. Given that the main rank is regularly full of hackney carriages and on the opposite side of the road from the main shopping area the very low levels of abuse by other vehicles (just 3% of observations were private cars) is not surprising (same level as in 2019). Some emergency vehicles did use the rank, but overall 95% of the vehicles observed were hackney carriages (just slightly less than the 96% of 2019).

Plate activity levels

To understand the level of vehicles active from the hackney carriage fleet, sample observations were undertaken to identify the proportion of plates active at three different times on all three different survey days. The proportion was taken of the 44 plates available for rank service, excluding the three specific plates.

Over all three days and each period within each day 64% (83% in 2019, 81% 2012, 90% 2008) of the fleet was observed active. This is a marked reduction from previous operating practice.

However, the overall value masks variation by day and time of day. The table below summarises the proportion of plates observed for the different sample periods and days, contrasting this with the previous 2019 results shown in brackets.

	Thursday	Friday	Saturday
Morning	20 (24)	20 (41)	14 (37)
Afternoon	20 (28)	18 (41)	18 (39)
Midnight hour	2 (37)	11 (46)	5 (57)

The profile shows how night demand in 2022 has plummeted with active vehicles significantly reduced at those times. It also shows when compared to the peak hour that the level of vehicles servicing that demand has dropped which will have led to increased levels of passenger waiting and hence unmet demand (see below).

Considering the activity level of specific vehicles, the most frequent vehicle was only seen in six of the nine periods. This vehicle was seen ten times overall (same as in 2019 for frequency of times seen). Three vehicles were seen in four time periods and two in three. All others were seen either twice or once only. The next most frequent total level of observation was eight times (one vehicle), seven times (one vehicle) six times (two vehicles) and five times (one vehicle). Overall, there are less vehicles active and those that are active seem to be active for less periods.

Existence of unmet demand

The observed rank data was reviewed to identify the hours when unmet demand occurred. Of the 72 hours of rank observation, 40% (31% in 2019) saw one or more passengers in the hour arriving when no vehicle was there for them to hire immediately. The range of waiting times saw the maximum wait for any person of nearly 20.5 minutes – a large increase on the under 9.5 minutes of 2019. The length of passenger waits has also tended to spread out with 14 waiting 11 minutes or more (compared to none in 2019), 28 six to 10 (was just five in 2019) and 56 between one and five minutes (reduced from the 84 of 2019).

Of the hours when there was average passenger delay (APD), two thirds saw APD of a minute or more. However, only one hour saw APD over five minutes – the 08:00 hour on the Thursday morning. Every hour from 21:00 to 02:00 on Saturday / Sunday saw passengers waiting.

Nearly 36% (7% in 2019) of all passengers travelled in hours when there was an average passenger delay – and there was unmet demand in 56% (50% in 2019) of surveyed off peak hours. This included all Friday afternoon as in 2019, with 26 waiting then (eight in 2019). The longest wait was in the 18:00 hour on the Saturday applying to two people, ironically the only ones to wait in that hour.

The overall picture is of a much worsened service to the public in 2022 even though there are less people seeking rank service.

Further discussion of the significance of the unmet demand occurs in the later chapter specifically considering this issue.

Disability usage of rank

Of all the hackney carriage movements observed, 30% appeared to be wheelchair accessible style vehicles (WAV). This is much higher than the 4% that exists in the fleet. Even allowing for there to be some vehicles which appear to be WAV but are not in reality WAV-capable (e.g. larger vehicles not converted to take wheelchairs), this suggests a focus of the small number of WAV on rank service. This appears much stronger than it was in 2019.

However, a counter observation to this is that, as in 2016, there were no persons observed accessing hackney carriages at the rank in wheelchairs during the full survey. However, there were six passengers observed with other apparent disabilities accessing vehicles at the 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 (e.g. of students, or a sub-centre), although conclusions from these separate samples can only be indicative taken alone. For some authorities with multiple centres this can imply value in using a higher sample size, such as 250 if there are two large and one moderate sized centre.

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, interviews were undertaken in the centre of Bideford, in Torrington, Holsworthy and Westward Ho! A total of 203 persons took part in the survey. All interviews were undertaken on Tuesdays or Thursdays in May 2022, very similar to dates in both 2019 and 2016. However, as in 2019, the smaller nature of Holsworthy and Westward Ho! restricted the number of people available making it hard to meet the target 50 from each of those two locations.

The present response sample obtained was compared to the latest national estimate of 2021 population structure (from the new census initial information). Slightly less males were interviewed than in the population figures (46% compared to 48% for the local census population). Our sample included more under 30's (17% compared to 15%) and a lot more mid group persons (42% compared to 32%), with correspondingly less of the upper age group (41% compared to 53% in the population values). This was a fairly similar sample and comparison to that undertaken in both 2019 and 2016.

83% said they lived in the Torridge Council area (exactly as in 2019, but less than the 96% of 2016. and may explain some of the slight extra discrepancy to the local values. Most, however, were from within the West Country though there were a handful of people from the east Midlands represented, again as in 2019.

24% said they had used a local licensed vehicle in the last three months. This is lower than either the 37% (2019) 46% (2016), or 34% (2012) and consistent with the trend in reduced levels of rank usage. For this survey, this share was split between 4% saying they had used hackney carriage only, 14% private hire only and 5% by either kind of vehicle.

People told us how often they used a local licensed vehicle. The largest proportion, 57% (44% 2019), said never, followed by 22% (23% 2019) saying once or twice yearly. The resulting estimate of trips per person per month is just 0.3 (0.8 in 2019). The hackney carriage specific value of 0.2 suggests that 81% of licensed vehicle usage is by hackney carriage. This is very much higher than either the 2019 value of 58% or the estimated 2016 level of 55%.

This is supported by just one of those responding regarding hackney carriages saying they could not remember seeing a hackney carriage in the area, very good given the lack of any livery policy or black cab style of fleet. However, 58% (52% in 2019) of the hackney carriage question respondents did say they could not remember when they last used one. Most frequent actual hackney carriage quoted usage was once or twice a year (23% of those responding).

Most people told us how they got licensed vehicles in the area. The highest option with 58% (60% in 2019) of responses was phone. 33% (31%, 2019, 39% 2016) said at a rank, none (8%, 2019) said a freephone and none (1% in 2019) said hailing. In this survey 3% suggested they used apps and 6% other methods (most of which were visiting a taxi office). These are relatively similar responses with the quoting of use of a taxi office the most notable difference from 2019.

One third of all respondents named one or more companies they used if they booked a vehicle. Of these, 4% named three, 51% two and 45% one company.

In terms of companies named, the number continues to reduce. The number quoted has fallen from 15 in 2016 to 12 in 2019 and just seven now in 2022.

However, of the seven quoted now, four were constant over the last three surveys, and the top three were all mixed hcv / phv companies. The top company took the highest level of mentions in all three surveys with just slightly less mention now than in 2016 (but more than in 2019). The second company had grown in mentions from 1% to 8% to 19% now. The third company saw 1%, 20% and 15% now. The fourth largest company mentions were for a hackney carriage only company that saw 2% in 2016, and 9% both in 2019 and now. One other (unknown) company saw 11% in 2016, nothing in 2019 but 3% now. The fifth company now gained 4% and the seventh 2% but had not been mentioned in either previous two surveys.

One private hire only company which gained 16% of mentions and third highest in 2019 was not mentioned at all this time.

This suggests a good range of companies, albeit a shrinking number, available and reasonable competition in the area, although it is clear there is a dominance of hackney carriages within most of the most active companies, with the possibility that many private hire service niche markets and are used by specific people who would not always be interviewed in different years. It suggests a good level of stability from the company side.

58% (32% in 2019) of those interviewed were aware of the Bideford Quay rank . Of these, a much lower 31% said they used it (74% in 2019). No other ranks were mentioned.

With regard to various aspects of peoples last trip by licensed vehicle, 41% (23% in 2019) of those interviewed provided a range of answers and provided answers for all aspects requested.

Not only have more people been willing to respond, but the overall level of responses have improved significantly. In all cases in 2022 the very good score level has increased. In all but price and driver appearance, the most common answer, ranging from 47 to 78% was that they were very good. The best score, with 78% saying very good, was for driver knowledge of the area. Driver appearance saw 41% very good, 49% good and 10% average. Price, however, scored worst (albeit much better than in 2019) with most saying either 'average' or 'good' (41%) and 13% saying very good (was just 2% then). This suggests price remains the key factor where people are less happy with the service provided, although this is a normal, national response. The only specific comments made were that people felt licensed vehicles were expensive – as in 2019.

In terms of matters that might encourage more use of hackney carriages, the highest score, in 2022 was 38% saying if they were more affordable (21% cheaper fares in 2019). The only other strong response was an increase to 53% saying nothing (14% in 2019). The level of those saying they would use more if there were more hackney carriages that could be obtained by phone has dropped away from 31% to 2%. However, the 2016 responses had been dominated by price.

Respondents told us if they, or anyone they knew, needed a vehicle adapted for a disability. The response was an increased 90% (85% in 2019) saying no, compared to 81% in 2016, suggesting less need for such vehicles. Where a vehicle was needed, the strong balance (10% compared to nothing, 13% compared to 2% in 2019) was in favour of fully wheelchair accessible style vehicles. This is continued vote in favour of such vehicles than in 2016.

With reference to giving up waiting at a rank, two people said they had, giving a latent demand at rank factor of just 1.1% (double the 0.5% of 2019).

In another manner, 54% said they felt there were enough hackney carriages in Torridge, with just 3% saying there were not. 43% said they did not know.

83% of those interviewed told us how their use of both hackney carriage and private hire had changed from before COVID and how they expected it to change moving forward. From before COVID, none said they used hackney carriages more but 4% said they would use them less (net decrease of 4%), for private hire the values were 4% up but 7% down, a net 3% reduction. 31% said they used both about the same.

Moving forward, people 1% felt they might use hackney carriages more and 4% less whilst 3% said they would use private hire more but 7% less, a net reduction for both of 3% and 4% respectively.

People were asked what COVID security measures were essential, important, useful or not important. None were counted principally as essential, with the highest score being 64% important to having a screen, 47% important a driver wears a face mask, 40% important the vehicle had been cleaned and 30% passengers wore face masks. These questions may have reduced in important since the questionnaire was undertaken with the further move towards less focus on the pandemic.

All those interviewed told us if they relied on licensed vehicles for any particular elements of life. 14% said there were specific elements. 24% of responses were for hospital visits, 19% the weekly shop, 14% for nights out and 10% for visiting friends and relatives.

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 given stakeholders, but we try 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, or letter 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.

Despite obtaining current key stakeholder details from the council and a range of internet sources, and inviting some 21 specific contacts to respond, no comments were made. Nor have the council received any recent complaints or compliments. This suggests there are no major issues people wish to draw to the attention of this Study at this time.

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. However, it is also rare for there to be high levels of response, with 5% typically felt to be good and reasonable.

For this survey, 134 letters were sent out on our behalf by the Council. There were a total of 21 responses, 16%, which is an excellent level for this kind of survey. This is the same level of response as in 2019, which itself was a slightly higher level of response than in 2016, but still less than the number that came back in 2012.

62% of those responding told us their main source of income was the licensed vehicle trade. 29% were part time and had other additional income with the final 9% being part time with no other income.

Of the responses provided, 67% (same as in 2019) were from hackney carriage drivers, 14% (down from 24% in 2019) from those that said they drove both kinds of vehicle, and 19% (was 10%) from those driving only private hire.

Taking all responses, the average level of service was 13 years (was 14 in 2019), ranging from one to 35 years (33 in 2019). When considered in terms of blocks of five years, the most common block saw 19% quoting between 26 and 30 years, the second highest level.

In terms of working weeks, the highest proportion of hackney carriage drivers worked either five or six days (32% for each, compared to 42% for six days in 2019) with a range of two to seven days (3-7 in 2019), with an average of five days (6 in 2019) and 36 hours (43 in 2019) (range 7.5 to 98 (30-60 2019). This suggests a reduction in the overall working week for those that remained working in the industry. However, it was felt in 2019 that the results were on the high side compared to previous, but the current numbers are still a clear reduction.

In terms of kinds of work undertaken, 76% of those that drove either hackney carriage or both kinds of vehicle said they serviced immediate hire work at ranks. Of the remainder, one hackney carriage (6% of total hackney carriage or both respondents) provided no responses, another said only immediate work bookings and two others (13%) only school contracts. 29% of the pure hackney carriage respondents said their only source of trade was from the ranks (although this was qualified in a further question below).

All four private hire responding said they principally undertook school contract work only. Of the three saying they drove both kind of vehicle, all said they undertook immediate hire from both ranks and bookings and advanced hire work. Two added school contracts, one of whom also added chauffer or corporate and business contracts.

This suggests the majority of public-facing work including private hire bookings appears to be undertaken principally by the hackney carriage fleet, including those who use both types of vehicle. 57% of respondents undertake school contract work, including 29% of the pure hackney carriages responding. It also suggests that rank work is not sufficient to support the industry in full.

More detail was provided by several about the proportions of work from different sources. 21% of the hackney carriages got 90, 97 and 98% of their work from the ranks. One obtained the rest from hailing, another 10% from phone bookings and the other 1% from hailing and 2% from bookings. One other hackney carriage obtained 50% from ranks, 40% from bookings and 10% from school contracts. This person said they had started working on Devon school contracts during the pandemic. Other hackney carriages only obtained 10-35% of their business from the ranks, with the bulk usually from bookings. This confirms the conclusions above that rank work is insufficient and needs to be supplemented.

The main issue affecting when people worked was 'preference' (43% (33% 2019) of those responding), followed by family commitments (21%, was 27%). 14% (two) said this was determined by when they needed to service school contracts. A further one person (7%) each said they worked evenings / nights, when there was space at the rank or when not working in their other job. In 2019, busy times scored 15%, with 9% saying they avoided times of traffic congestion and 6% avoiding times that passengers were more likely to be disruptive. None of these reasons were mentioned in 2022.

71% (81% in 2019) of those responding owned their own vehicle, (lower than 2019) but 43% (57%) said someone else also drove the vehicle they used, a relatively high level of shared usage of vehicles, but lower than in either 2019 or 2016. Half of the four telling us when someone else drove said in daytimes, a quarter said evenings and the remaining quarter said when they were not using it.

Pre-bookings were accepted by 52% (was 86% in 2019) of those responding, much lower than the level quoted in 2019. 45% (60% in 2019) of these came by phone, with the remainder seeing one say radio, one operator and the remainder by phone but with other options as well such as email, text, website or social media.

Half of the hackney carriages said they principally serviced the Bideford rank with another saying 'Torridge'. One added 'Barnstaple area' and another both Westward Ho! and Appledore. All three dual vehicle users mentioned Bideford rank with one also adding Westward Ho! and Barnstaple.

Of all those responding (which was most), all but one said there were sufficient hackney carriages in the area now.

13 of the respondents including two (half) the private hire gave reasons the limit benefitted the public. Half said it ensured a better service with a focussed number of drivers with the other saying it kept driver remuneration more in control which meant better vehicles and standards. One said restricted vehicle numbers benefitted the environment and prevented potentially much higher numbers.

With regards to COVID impacts, just 22% said they knew of drivers who had given up due to the impacts of the pandemic. These four responses were that people knew one, three, eight and fifteen people respectively.

Three respondents said rank trips in 2022 were about the same as three years previously. Five said less with values ranging from 15% down to 60% down and others not feeling able to estimate the proportion. More felt bookings were about the same, with one saying 15% less and another saying more.

Respondents were asked how often they had customers needing to travel in a wheel chair either from the rank or from a booking. Most responded. From a rank people responded monthly (55%) rarely (14%), yearly 9% with the remaining responses spread over a range of frequencies. Just one person said weekly, and none said daily. For those in a wheel chair transferring, the monthly response was 58%, weekly 11% with the rest spread equally – suggesting higher levels for transfers.

For bookings. 38% said monthly (46% for transfers); 13% each said rarely (same for transfers), daily or weekly with the remainder spread over the remaining frequencies. For transferring, 8% said there were daily trips.

These results suggest more wheel chair passengers make bookings than go to the rank, with more tending to transfer than travel in their chairs, and that those booking are those using the facility more frequently. There were just four responses for those saying wheel chair passengers were part of contracts – with these split between two per week, weekly, monthly and rarely.

In 2019, this question was posed differently and 68% of drivers said they had received no requests for wheel chair work in any form, with 16% saying one to five, and 11% six to 10. One other person advised us they had received 16-20 such requests in the last year.

Other comments were made. One said early evening trade was increased arising from reduced bus services, but that overall demand was strongly reduced given that two pubs and one nightclub had not yet reopened since the first lockdown. They said they believed one of the two pubs had now reopened and they retained their focus on the rank despite pickings being light. They did not agree with any review at this time and certainly felt there was no need for removal or increase of the limit. Another pointed out the need for a shelter at the rank and concentration on improving standards of the fleet. A further person suggested need for ranks in both Westward Ho! and Torrington and more spaces at the main Bideford rank. They strongly opposed any removal of the limit and confirmed many made a living by working on school contracts.

One final comment was made that the driver felt the Council was a good council that cared for those under its jurisdiction.

Overall the viewpoint was that retaining the limit, and at its present level, was essential to retain hackney carriages in the area.

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 (factoring high demand level impacts down) to 1.2 for January / February (inflating the values from low demand levels upwards).

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 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 and needs to be taken fully in context.

The table below presents the results from the analysis for the current 2022 information alongside the results from previous surveys.

Element	2022	2019	Test	2017	2016	2012	2008
Average wait (mins)	0.97	0.27	0.27	0.23	0.23	0.11	0.12
Peak factor	0.5	0.5	0.5	0.5	0.5	1	1
% Queues in weekday daytime hours	56.3	50	12.5	25	50	0	0
% pass in hours with waiting over 1 minute	35.6	7.28	7.28	7.874	6	0	0.94
Latent demand	1.011	1.005	1.005	1.055	1.055	1.038	n/k
Overall index	978	48.77	12.19	24.23	37	0	0

Apart from the peak factor, which has remained the same with a peaky demand profile in place all other elements of the index of significance of unmet demand have increased for this survey. Average passenger waiting time has increased from just under half a minute to just under a minute. The level of off-peak waiting has increased but the proportion of passengers travelling in hours when there is a minute or more average passenger delay in that hour has increased more than fourfold. Latent demand is marginally increased.

All these result in an overall index well beyond the normal cut-off value of 80 taken to suggest the observed unmet demand is significant. However, given that the index is not linear, the change from 2019 is not unexpected, although service levels are generally much worse.

The main driver of the level of significance is the proportion of people travelling in hours with a minute or more average passenger delay.

Further discussion of this occurs in the synthesis section below.

8 Summary, synthesis and study conclusions

This survey of demand for hackney carriages on behalf of Torridge District Council has been undertaken following the guidance of the BPG and other recent case history regarding unmet demand and its significance. This chapter provides a summary of the earlier chapters, a synthesis of how and what these mean in conjunction with each other and provides the study conclusions. The recommendations are provided separately in Chapter 9 which follows.

Background and context

The latest full review of demand for hackney carriages in the District was undertaken with most survey work during mid-May at a similar time to the last full survey in 2019. The authority has restricted hackney carriage vehicle numbers since 2001 and regularly tests the impact of this policy on service levels since that time. An issue of three plates was allowed in 2005 to provide a very specific niche service that is very unlikely ever to impact on the main hackney carriage service provided.

Until 2015, hackney carriage vehicles dominated the overall licensed vehicle fleet in this area. Private hire numbers have increased after a small dip since the last survey against the national trend which is believed to be related to a growth in vehicles servicing school contracts.

All drivers are able to drive all vehicles available to them in the area, with 'dual' driver licences in place for a substantial period. The current driver numbers are within a continued level of growth. Operator numbers are showing a clear but steady decline, with their peak having been in 2012 and are generally low.

The fleet now has just two wheelchair accessible style vehicles both of which are in the hackney carriage fleet. Given the small overall fleet size, this face value of 4% of the hackney carriage fleet puts Torridge just below the Government action target of 5%, but also places it just above the lowest 21% of all authorities that have mixed saloon / WAV fleets, and below the average level of 22% that exists for these kinds of fleet. In reality the proportion should be quoted of the 45 hackney carriage available fleet, although when rounded this would not change the value of 4%.

The operating structure of the fleet is relatively complex. In essence 19% of the total licensed vehicle fleet are within five mixed fleet companies and 18% are independent hackney carriages. More than 28% of the fleet are not publicly available with a further 28% in pure private hire companies. There is a high chance, particularly in Bideford, of a phoned-for vehicle turning up as a hackney carriage.

Rank observations

There is now in reality only the central rank in Bideford that sees passenger and vehicle usage. This is not for want of attempting to encourage other ranks not only around central Bideford but also in other areas – but it is clear that there is simply not sufficient demand for them to be worth anyone waiting at. The main rank has now settled down to operating with the main river-ward section for the main daytime hours, supplemented by allowing use of the bus stops on the town side from midnight onwards, providing extra capacity at the time there is more passenger demand.

Observation of this rank now covers a full 72 hours from early Thursday to the early hours of Sunday, which also compares directly with the interim survey undertaken in December 2017. For 2022, the estimate weekly patronage of the rank is 1,180 passengers. This is 40% lower than in 2019 and half of the (peak) 2016 level. The pandemic seems to have taken away the relative stability of demand that had been observed since 2016, although 2012 to 2016 had also seen a 41% drop, so this is not totally atypical.

Comparing day totals Saturday has seen the largest decrease, an almost halving since 2019. Friday flows were only 22% reduced. The area retains a sharp peak on the Saturday night although the Friday also has an almost similar peak in 2022. This survey Saturday peak was 60% of the level observed in 2019 albeit in the same hour, 01:00 on the Sunday.

The average flow level over all hours has reduced from 19 in 2016, 14.5 in 2019 to just 9 passengers per hour. When divided by the average occupancy of 1.5, and shared between all rank-available vehicles, this is just 0.1 paying trips per vehicle per hour – incredibly low.

The early hour period with no flows continues to reduce in size from Friday (5) to Saturday (4) to Sunday (2).

The rank remains very little abused by other vehicles, with 95% of all observed vehicle movements being hackney carriages.

Tests of fleet activity levels across the survey days suggest a marked reduction in 2022 of the level of fleet active – down to 64% now compared to 83% in 2019 and 90% in 2008. This is further worsened by the loss of two from the hackney carriage fleet.

The comparison is much starker when reviewed by period with night activity of vehicles very strongly reduced. In summary there are less vehicles overall active and those that are active tend to be active at or near ranks for less time.

Even with reduced demand for vehicles, reduced activity of available vehicles and reduced vehicle numbers have compounded to see an increase in the number of hours observed when unmet demand occurred (31% to 40%). The maximum passenger wait has risen from 9.5 to 20.5 minutes and compared to 2019 when no-one waited 11 minutes or more there were now 14 people that waited in the 11 minutes or more category in 2022.

The overall picture is a much worsened service to the reduced level of public demand at the rank.

Although 30% of vehicles observed at the rank appeared to be wheelchair accessible, much higher than the 4% in the real rank fleet, no-one was seen using a wheelchair to access any vehicle at the rank, although there were six people with other observable disabilities noted being assisted into vehicles at the rank. These values were exactly as in 2019.

On street public views

A generally representative sample of 203 persons was interviewed in four locations across the District, with 83% saying they were from the area (as in 2019). 24% (reduced from 37% in 2019) said they had used a local licensed vehicle in the last three months. 4% said they had used hackney carriage only, 14% private hire only and 5% had used either kind of vehicle.

It was estimated that there are 0.3 (was 0.8 in 2019) licensed vehicle trips per person per month with 81% (was 58%) of these undertaken in hackney carriages. Just one of those interviewed said they could not remember when they last saw a hackney carriage in the area, very encouraging, although a higher 58% (52% in 2019) of the hackney carriage respondents said they could not remember when they last used one.

58% (60% 2019) said they got licensed vehicles by phone and 33% (31%) said rank. None (8%) said freephone and none (1%) hailing. For this 2022 survey, 3% said they used apps and 6% other methods, principally visiting a taxi office.

In terms of phoned-for vehicles, less companies were again named this time, continuing the reducing trend that suggests ongoing agglomeration of companies. The top three (two in 2019) were mixed fleet companies. The fourth was a hackney carriage only company suggesting that even those that phone for vehicles are very likely to have a hackney carriage collect them.

58% (32%) of those interviewed were aware of the Bideford Quay rank and but a lower 31% this time (was 74% in 2019) of these said they used it.

A significant point for this survey was that not only have more people been willing to respond, but the overall level of responses has improved significantly with great improvements in the 'very good' score levels across the board. The best score overall was for driver knowledge of the area.

In terms of matters that might increase hackney carriage usage the main one was if they were more affordable. However, the other strong response this time was to 53% saying nothing would increase their usage of licensed vehicles, from 14% in 2019.

There appeared to be even less need for wheelchair accessible vehicles in this sample than in 2019, although this might be related to the lower proportion of the older group interviewed. Those needing such vehicles showed a very strong requirement for a fully wheelchair accessible style.

Latent demand was increased to 1.1%, double the 0.5% of 2019, but still very low, and particularly so given the increase in waiting times noted in the rank surveys.

Trends from before COVID to now, and in three years hence, suggested a continued slow decline in usage of both hackney carriage and private hire vehicles, at 3-4% in both cases.

The most important COVID security measure quoted was 64% saying it was important to have a screen, with none quoting any items as being essential (possibly as the interviews were at a time formal restrictions had been removed and COVID rates were reducing generally).

Of the 14% of respondents who said they relied on licensed vehicles 24% said hospital visits, 19% the weekly shop, 14% for nights out and 10% for visiting friends and relatives.

Key stakeholder views

As seems to be the case post pandemic, no feedback was provided by any key stakeholder despite effort being made to provide them opportunity.

Trade views

Trade response at 16% (the same as in 2019) was an excellent level. 62% were from those whose main source of income was the licensed vehicle trade, 29% part time with other income and 9% part time with no other income.

67% (same as in 2019) of those responding said they drove hackney carriages. Average level of service was 13 (14 in 2019) years on average.

The average working week was five days and 36 hours (six days and 43 hours in 2019) for hackney carriages with a range of between 7.5 and 98 hours (30 and 60, 2019).

Interestingly, all the private hire response was from those saying they focussed on school contracts. In total, 57% of respondents said they undertook school contract work.

There were three hackney carriages whose principal work was from ranks, but the remainder suggested the share from ranks was between 10 and 35% with the bulk from bookings. The main focus of why people worked when they did was now on preference (43% compared to 33% before).

A lower 71% (81% in 2019) owned their own vehicle and again a lower 43% (57% in 2019) said someone also drove the vehicle they used. A reduced 52% (86%, 2019) said they accepted pre-bookings.

Half the hackney carriages said they mainly serviced the Bideford rank although Westward Ho! and Appledore (and Barnstaple) were also mentioned as places serviced. The feeling was almost exclusively that there were sufficient hackney carriages in the area at this time.

Wheel chair usage tended to be marginally higher for bookings than for ranks and similarly so for transferring compared to travelling in the chair. This is particularly interesting given there are now only two such vehicles in the entire fleet.

The benefit of the limit was split between ensuring better service given a focussed number of drivers and keeping remuneration higher enabling better vehicles and standards maintenance.

Just over a fifth were aware of people having given up due to the pandemic.

There was a range of views about how rank trip demand had changed. The views were same or reduced, whereas bookings were felt to have been more similar.

Many other comments were made including pointing out that many venues had still not reopened including the main night club (only just reopening around October 2022).

Formal evaluation of significance of unmet demand

The overall result of the index of significance of unmet demand is that the level is above that counted to indicate significance of the observed unmet demand.

Apart from the peak factor that has remained the same, all other elements have worsened, with the average passenger wait doubling to just under a minute and the main other change being the increase in the proportion of passengers waiting over a minute fro 7% to nearly 36%.

This is against a background of reduced overall demand of some 40%, which normally would see performance statistics improve. The context and conclusion from this is discussed below.

Synthesis of results

This survey was undertaken at a similar time three years on from the previous, but with the pandemic covering much of the period in between. Despite much more normality returning, it is known that the main night club had not reopened at the time of survey nor was it clear if it would do so. One of the clear pointers from the information gathered is that the public are very impressed with the overall service provided despite the rank work advising us that average waiting times and maximum waiting times at the rank have increased.

It is also very clear that a good proportion of people in Torridge using licensed vehicles will receive a hackney carriage even if they make a booking given the dominance of companies used by mixed fleet operations. This is good as it would also enable people to hail vehicles from those companies if it suited them although the mixed fleet format could cause confusion if people were unaware of the distinction between the two types of vehicle.

Overall estimated demand is down 40%, with a key loss in the Saturday night peak clearly evident from the rank observations. However, overall Saturday flows are lower whilst Friday flows have actually increased. With the overall average level of rank usage having fallen, and a focus towards mixed fleet companies, more hackney carriages will be servicing bookings. This implies they can be more confident of earning a given level of remuneration within the week.

With the pandemic encouraging people to think about lifestyles, there has tended to be a focus on people generally working more when it suits them than when service might be needed. Our review of available vehicles shows that the number of vehicles working later has reduced significantly for a mix of reasons.

The increased Friday overall levels of demand have also meant the time at which adequate remuneration might be received will also have been drawn back earlier leading to again less vehicles needing to operate.

Review of the delay times find several occurring when passenger demand is very low – an issue known as 'thin' demand – which is very difficult for fleets to meet without incurring waiting that brings insufficient remuneration.

The amount of passenger delay from 17:00 Saturday to 01:59 Sunday accounts for 53% of total passenger delay. In terms of demand levels, the actual observed number of departures suggest no more than eight to ten vehicles should be able to meet this without significant delay being incurred by passengers. This is less than a quarter of the current fleet that should be available.

Conclusions

The present hackney carriage service in the Torridge District seems to be in a relatively healthy position and the limit policy appears to provide public benefit within this. The 'new normal' does not yet seem to have achieved a balance between driver operating practice and passenger demand which has led to an observed significantly poorer public service – although perversely views about this from the public have in their eyes seen strong improvement.

9 Recommendations

On the basis of the evidence gathered in this survey of demand for hackney carriage for Torridge District, 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 Torridge District licensing area that at present would require issue of more licences. The committee is therefore able to retain the limit at its present level and defend this if required.

The only issue arising is the need to consider encouraging more vehicles to service the apparently growing weekend night economy, which might require higher fares at that time.

There is also an issue that care needs to be taken where vehicles are supplementing their income in lower demand periods by working from telephone bookings that the level of vehicles at the rank is not reduced to the point that passengers find gaps in service at the ranks, particularly in the mornings.

Further, the focus on lifestyle choices by drivers that is possibly reducing weekend supply of vehicles together with an ability to achieve desired remuneration without this, needs to be discussed and reviewed. Were it to become clear that there was an unwillingness to service such demand, more plates or even removal of the limit might be necessary. However, this would generally be a negative step as the stability the limit gives might reduce those willing to continue hackney carriage service even further, which would be against the public interest that is presently developing more of a one-tier licensed vehicle operation in the area.

A test of levels of service in both terms of passenger delays and numbers of vehicles operating may be needed within three months of the date of the re-opening of the main night venue to ensure there has been a significant and appropriate response by the current trade to meeting that need. That is doubly important to ensure that the future of the night club is enhanced by the ability of its patrons to get home safely.