



Torridge District Council  
Survey of demand for hackney carriages

December 2025



## **Executive Summary**

This survey of demand for hackney carriages has been undertaken on behalf of Torridge District Council following the guidance of the November 2023 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 2025 survey, the latest in a series of tests of the level of unmet demand, saw rank work undertaken in September 2025, later than that for the previous two surveys principally due to road works at the preferred survey time. Estimated weekly passenger demand has reduced 23% more since the last survey in 2022 and is just 39% of the peak level recorded in 2016.

Flow profiles are similar to 2022 although Thursday flows have reduced the most since 2022. The peak to average flow has increased, making adequate servicing of demand more difficult. Overall demand is very low at just seven passengers per hour on average, compared to 19 in 2016. Whilst public views of the service have improved from it being very good to even more so, performance statistics using the industry standard tools have worsened.

49% of all delay time is for hours with 'thin' demand when it is hard for a fleet to meet demand effectively. However, the conclusion that the unmet demand is significant requires action.

Our view is that the normal option of adding extra plates would be counter-productive and a preferred solution would be working with the hackney carriage trade to attempt to ensure gaps in rank service are filled by present vehicles. It must be remembered that the prime reason for issue of hackney carriage plates is to serve the public at ranks, and the identification that a number of plates never service ranks is a major concern.

If unmet demand levels remain significant and the trade are not able to sufficiently cover the rank to provide appropriate levels of service, then the Committee will need to seriously consider either an increase in plate numbers or removal of the limit altogether.

It is accepted that either option, and particularly the latter, would likely cause significant disruption to the trade whilst new operating models are established. The fact the limit is currently supported by both hackney carriage and private hire shows its overall benefit in terms of providing stability but there needs to be reciprocal action to ensure that adequate service levels are provided.



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## **1 General introduction and background**

Licensed Vehicle Surveys and Assessment (LVSA) is a joint venture between CTS Traffic and Transportation Ltd (CTS) and Vector Transport Consultancy. These two companies have hitherto been the two leading practitioners of hackney carriage unmet demand surveys in recent years and who joined forces in early 2017. The combined experience of this joint venture covers in the order of 280 similar studies undertaken since 1999. The contracting company for this survey, CTS, also undertook the previous three surveys for this authority, in 2022, 2018 and 2015, and is aware of earlier surveys, therefore having unrivalled knowledge of the operation of licensed vehicles in the area.

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.

### **Best Practice Guidance**

This review of current policy is based on the Best Practice Guidance produced by the Department for Transport in November 2023 (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".

The revised and updated version of the BPG published in November 2023 made significant revisions and additions to the overall guidance to licensing authorities and followed a wide (and lengthy) consultation and even lengthier wait for issue of the Final version following the draft publication.

It supplements and complements the introduction of the "Statutory Taxi and Private Hire Vehicle Standards" (STPHVS) document on 23<sup>rd</sup> July 2020 (see further detail below). None of these resulted in any material change to the elements regarding unmet demand and its review. In essence the new BPG retains much of the material content regarding unmet demand from its 2010 predecessor.

## **Overarching Background**

Current hackney carriage, private hire and operator licensing is undertaken within the legal frameworks first set by the Town Police Clauses 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 (LGMPA) with reference to private hire vehicles and operations. The LGMPA 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.

## **Public Experience**

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.

We accept this is at odds with the current Government strict definition that 'taxis' are hackney carriages (a term they prefer not to use) and all other vehicles are either private hire or minicabs, but a good part of the content of unmet demand work is with those using the service, not those regulating it so we have to ensure those we are consulting with understand exactly what we are discussing with them. There are very few persons outside the licensed vehicle trade who wish to have the exact definitions explained to them.

## **Taxi Licensing Review**

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 retains the long-quoted comment "most local licensing authorities do not impose quantity restrictions, the Department regards that as best practice" (but continues not to provide any statistical backing for that comment).

The most recent reviews of overall taxi licensing 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 All-Party Parliamentary Task and Finish Group which reported in September 2018, the Government Response in February 2019, the consultation on "Protecting Users" which closed on 22 April 2019, which resulted in the issue of the "Statutory Taxi and Private Hire Vehicle Standards" (STPHVS) on 23<sup>rd</sup> July 2020.

A fully revised Best Practice Guidance document draft was issued in November 2023 although for the purposes of this Report there is little difference from the content and requirements of the 2010 document. Planned local government reorganisation as well as continued concern over safety and 'out of town' operations are currently under discussion with plans to issue more consultation documents on future licensing imminently.

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 and most recently the International Association of Transport Regulators) but the upshot remains no significant change in legislation from that already stated above.

BPG encourages a focus on minimal regulation where that is practicable and policies that will achieve the aims of the licensing authority. It does clearly state that local licensing policy and action is for local licensing authorities and their councillors to determine and drive forward.

### ***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 time horizon found useful for these studies should also be used for rank reviews and accessibility reviews.

The current BPG seeks to align the timeline for refreshing demand surveys with Local Transport Plan revisions, although these are not actually as frequent nor consistent in their timelines as the BPG assumes. The BPG does however clearly state that five years should be the absolute maximum time between a range of surveys including those for unmet demand. It does not preclude earlier undertaking of such surveys if necessary. It would seem prudent for example to repeat surveys in a shorter timeframe were the levels of unmet demand close to becoming significant, or in the case where the level was significant at the survey snapshot.

The latest Government thinking is to move taxi licensing to the around 70 either existing or to be created Local Transport Authorities, but the application of this will be some while away.

### ***Present background to licensing trends***

A trend occurred which saw a good number of authorities remove their limits on hackney carriage vehicle numbers in favour of 'quality control', essentially requiring all new hackney carriages to be wheelchair accessible. This led to saloon style vehicles effectively having a limit and also gaining 'grandfather' rights to remain as such, although various developments and changes have been applied. Such requiring of WAV style vehicles is currently more difficult given the pressure on operating costs in conjunction with most WAV tending to be the higher polluting diesel vehicles.

More recent choices have seen authorities wishing to encourage more electric or sustainable fuel vehicles into both the private hire and hackney carriage fleets, although for some this has seen a strong reduction in the hackney carriage fleet numbers, including in London, where many of the remaining non-electric fleet are no longer being replaced when their current limit on age expires.

The latest BPG now encourages distinction between hackney carriage and private hire vehicles to focus on private hire only being distinguished from private cars by having their rear licensing plate, although not all authorities agree with this stance. In general, hackney carriages have roof signs although some authorities do allow roof signs on private hire, some as long as they only advertise the company and do not say 'Taxi' and others by having the sign at right angles.

For Torridge at this time, all hackney carriages have a red rear plate and must have a roof sign; private hire have a green rear plate and must show 'pre-book only' signage.

**Legislative Additions**

There have been some actual changes to legislation (not guidance) put in place over recent years.

The Deregulation Act 2015 had two clauses relevant to taxi licensing – relating to length of period covered by licences (Section 10) and allowance of operators to transfer work across borders (Section 11) (both enacted October 2015).

In November 2016, the Department of Transport (DfT) undertook its consultation regarding enacting Sections 165 and 167 of the Equality Act 2010. These allowed for all vehicles capable of carrying a wheel chair being placed on a list by the Council (Section 167) leading to any driver that uses a vehicle on this list having 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 so chooses to travel in a seat to make provision for proper and safe carriage of the wheel chair
- To take such steps as are necessary to ensure the passenger is carried in safety and reasonable comfort
- To give the passenger such mobility assistance as is reasonably required

Since enactment in April 2017 issues with discrimination have not reduced as much as expected and further change occurred with one of two 2022 Acts put in place (see below).

The two 2022 Acts make small but significant changes. The 2022 Acts are 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)".

The first makes it mandatory for any licensing authority in England that has information about a taxi (hackney carriage) or private hire vehicle (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.

The second amends the Equality Act 2010 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 for doing so.

Regard has also been had to the Statutory Taxi and Private Standards July 2020 which were published on 21 July 2020 and represented a milestone in transportation regulation, because for the first time the safeguarding of children and vulnerable people were put right at the heart of the taxi licensing system. This publication also noted that a more complete review of all sections of the 2010 Best Practice Guidance would occur in due course and consultation on a draft of this new document ran from March to June 2022.

The "Protecting Users Statutory Guidance" (now the "Statutory Taxi and Private Hire Vehicle Standards" (STPHVS) was issued in July 2020 for application and advice of such application to DfT by the end of January 2021.

For completeness, STPHVS seemed to require by the end of January 2021 the following:

- Making publicly available a cohesive taxi licensing policy document
- Clearly documented ways the licensing authority will share information between relevant stakeholders
- Provision of a robust system for recording complaints that is clearly made known to passengers
- Sufficient training for those making decisions about licence issue
- Clear assessment of option of mandating CCTV in vehicles
- Specific requirements for private hire company records

However, no clear enforcement of this was ever observed and even the focus on the new BPG is now being overshadowed by discussion about local authority reorganisation and the potential shift of licensing not only to the new authorities but also often further up to the relevant transport authority (which are often overarching over large areas).

Further, the plans to introduce Section 161, and the determination of a proportion of WAV that any fleet must have by the Secretary of State (a quota), are a long way from even any consultation being undertaken. This issue was considered by the Law Commission but they stated 'we did not consider quotas of wheel chair accessible vehicles to be a suitable issue for treatment within a national licensing framework' (Law Commission Final Report para 12.60), nonetheless they reiterated that any such quotas should be decided by individual licensing authorities in response to local needs. They also quoted DPTAC suggestion the quota should be over 30% and that the Joint Committee on Mobility for Disabled People had suggested a minimum of 50% (Law Commission Final Report para 12.61). The often quoted 35% quota was from an earlier European Research document – "Economic Aspects of Taxi Accessibility" (International Road Transport Union, 2001).

A much earlier Government plan that all hackney carriages would become wheelchair accessible style also failed to see the required consultation about this occur, and that plan never moved forward. The European Research was one outcome from that proposal, but as already noted its conclusion was that full wheelchair style fleets would rarely be economic in the situation where the provision made was by individuals.

***Review of unmet demand using industry standard tool***

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, notably the addition of the latent demand factor with respect to the measurable part of that demand.

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. The reaction of many authorities to that request was to remove limits.

The current BPG confirms again the additional suggestions of how these surveys should be undertaken, albeit in general but fairly extensive terms. A key encouragement within the BPG is that vehicle licensing policy should be aligned with the overarching Local Transport Plan process. BPG suggests for unmet demand review key points in consideration are passenger waiting times at ranks, for street hailing and telephone bookings, latent and peaked demand, wide consultation and publication of “all the evidence gathered”.

### **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).

2019 saw three challenges with respect to surveys of unmet demand. All three found in favour of the current methodology being undertaken. A key focus was the need for a robust and up to date independent survey report being available.

In one case it was made clear the current guidance is based on the 2010 BPG, which supersedes previous notes and DfT advice, whilst in another case having a valid survey meant those challenging had no case for their proposed challenge, and in the final case an authority was clearly told they could not rely on a very old survey which itself could not be produced. In the end a fresh survey was undertaken, finding no unmet demand, but undertaken on the established standards only.

A 2023 case which sought to add a non WAV vehicle to a fleet that has a mandatory policy failed, seeing the WAV policy maintenance being supported, but this was in advance of the new BPG which now focusses on wider accessibility albeit ensuring sufficient WAV are provided, but also encouraging a check what the real need of vehicle characteristics is in a licensing area. Again, the focus remains on local provision for local need.

As is usual in a diverse industry, other formal and informal groups continue to suggest potential changes to licensing that might be applied – but none of these, however strongly presented, have any legal weight and must be taken fully in context. This includes various changes arising from need to consider pollution and air quality issues although some elements of this will legally apply, but at a much higher level than specific licensing legislation, which may imply clashes with established legislation and more so present practice.

### ***Cross Border and Sub Contracting Implications***

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.

### ***Current Operating Situations***

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 (such as drivers working shorter weeks, more time by drivers undertaking contracts or diversifying as delivery drivers, changed passenger use of ranks and locations arising from matters such as reduced rail travel, etc).

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. However, our experience suggests that even spare plates and reduced demand can still result in unmet demand increasing as a result of change in the range of elements that need to balance to provide better public service.

The upshot of all the changes in legislation with respect to the principal subject of this survey, local authorities retain the right to restrict the number of hackney carriage vehicle licenses.

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

For Torridge, drivers have long had a single licence allowing them to drive both private hire and hackney carriage vehicles, which means it is hard to identify those who drive one kind of vehicle or the other without asking them directly.

## 2 Local background and context

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

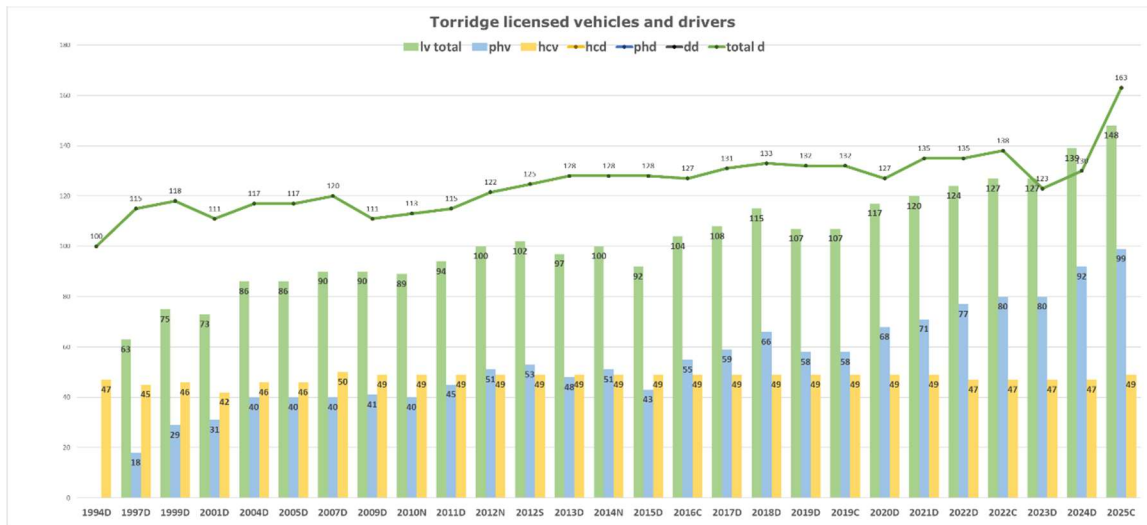
- appointed Licensed Vehicle Surveys and Assessment (LVSA) on 16<sup>th</sup> June 2025
- in accordance with our proposal of May 2025
- as confirmed during the inception meeting for the survey held on 18<sup>th</sup> June 2025
- this survey was carried out between July and October 2025
- On street pedestrian survey work occurred in September 2025
- the video rank observations occurred in mid-September 2025
- Licensed vehicle driver opinions and operating practices were canvassed by an all-driver survey undertaken through September and October 2025
- 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 68,830 (2023 estimate from 2021 census) (68,100 (2021) using the initial results from the 2021 census, which was 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 number of hackney carriages in the area saw a slight dip between 2022 and 2024, although the number is now back to the limited number of 49, in place since the addition of specific plates in 2005 for the Clovelly taxi bus operation.

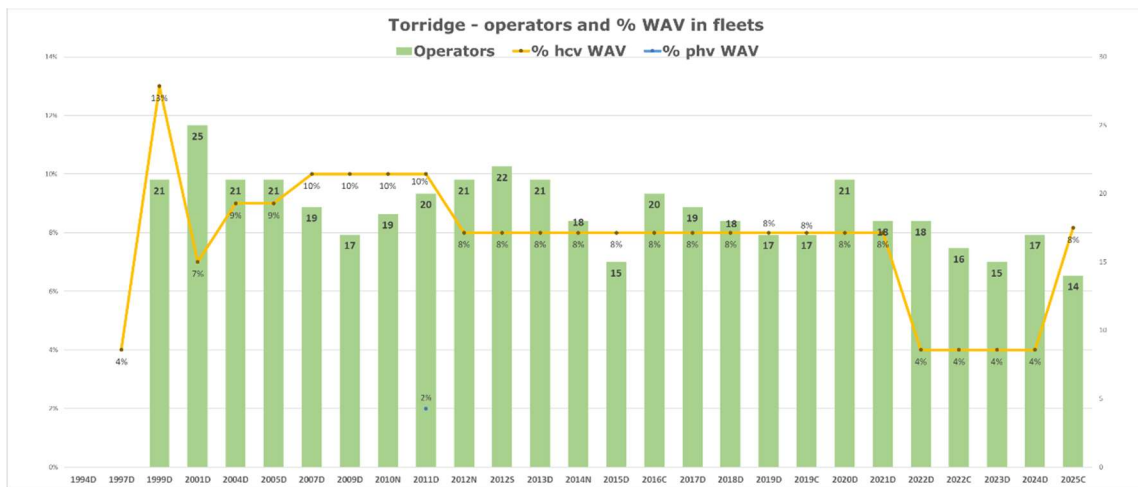
The graph above shows a general increase in the level of private hire vehicles in the area with a dip around the time of the last survey but continued growth since then (and unlike most other authorities no reduction following the pandemic). This is understood to be related to vehicles working on education contracts.

It is only really since 2015 that there has been more private hire in Torrige 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 from 2022 to 2023. However, it is not possible to compare driver numbers to specific vehicle types given their dual status, but there are now again more drivers than total vehicle numbers (this was not the case in 2023 and 2024).

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 hackney carriage wheelchair accessible vehicles (WAV) reduced around 2011, then remained static at 8%, dropped to just 4% (the two hackney carriage vehicles whose plates were handed back were WAV style) but has now reverted to the 8% of the fleet with those two vehicles now replaced.

In contrast to vehicle and driver numbers, the number of operators dropped from 2022 to 2023, rose and then dropped back to see its lowest ever level in the statistics provided by the council for the time of the survey.

To put the WAV value in context, in the DfT 2024 statistics there were 267 English licensing authorities excluding London. For these, the average level of hcv WAV is 38%. However, of these, 52 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, 41% of authorities have 8% or less WAV; 59% have 9% 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. The previous loss of two vehicles, now returned, is a valuable change.

### ***Demand Surveys***

Torridge undertakes regular review of its policy to limit hackney carriage vehicle numbers in line with the BPG. The previous surveys were in 2022, 2019, 2016, 2012 and 2008, with a rank demand review only undertaken in December 2017.

### **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).

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.

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. For 2025, the observations were undertaken in mid-September as the planned July observation slot was not possible due to the impact of emergency road works that were put in place just before the proposed survey work occurred.

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	2025	2022	2019	2017 (Dec)	2016	2012	2008
Bideford	914	1,180	1,958	2,032	2,339	1,652	2,013
Quayside Café	Gone	Unobserved			7	Not there	Not there
Holsworthy Square	Gone					10	Unused
Total Demand	914	1,180	1,958	2,032	2,346	1,662	2,013
Comparison to previous year	-23%	-40%	-4%	-13%	+41%	-17%	

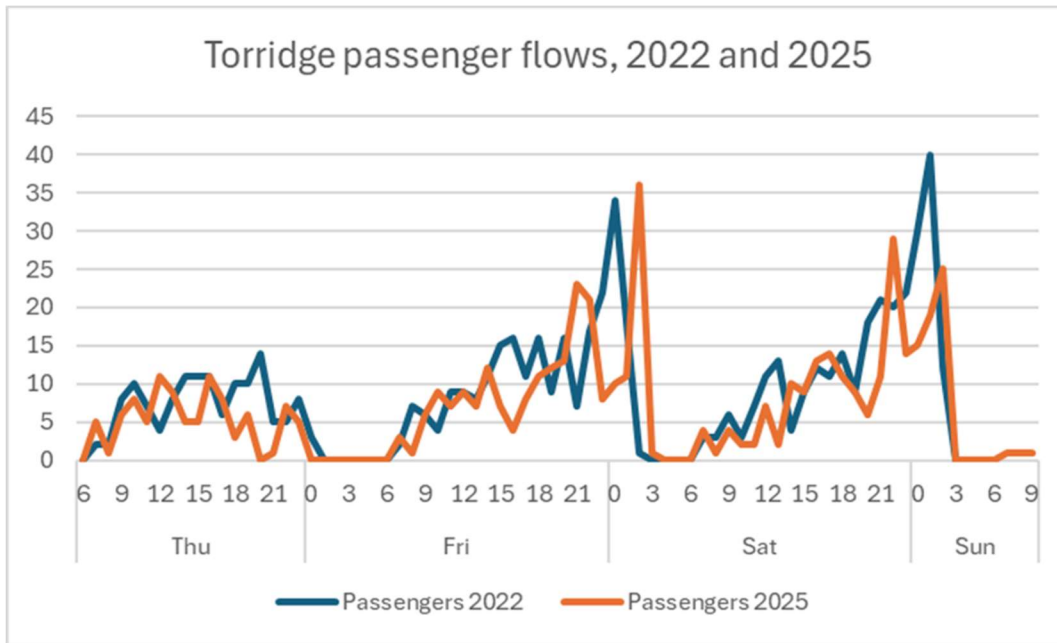
The table shows there are an estimated 914 (1,180 in 2022) passengers per week leaving the Torridge rank provision in a typical week. This is 23% (40% in 2022) less than the information gathered three years ago.

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

	2025	2020	2019	2017 (Dec)	2016
Thursday	96	135	218	230	Not observed
Friday	219	238	306	435	289
Saturday	207	268	520	451	533
3-day total	522	641	1,044	1,116	n/a

The table shows the general trend of a 23% reduction does vary by day. In 2025, Friday saw least reduction (8%) with Thursday seeing most (29%) and Saturday marginally less (23%).

The hourly flows for the 2025 and 2022 surveys are shown graphically below:



There is a remarkable similarity between the overall profiles of 2025 and 2022 demand, but also key differences. 2025 is generally, but not always, lower than 2022 but also appears peakier, with two peaks on both Friday and Saturday rather than the single peak on each of these in 2022.

The 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 00:00 to 05:00 hours on Friday (one hour longer than in 2022), 04:00 to 06:00 on Saturday (one hour less than in 2022) and 03:00 to 06:00 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, 2022 at 4.4 times the average, the ratio in 2025 is 5.2. Average rank demand is now at 7 (down from 19 in 2016, 14.5 in 2019 and 9 in 2022) passengers per hour. The peak flow of 36 now is not much lower than that of 2022, with 40 then, but very much lower than the 67 observed in 2019. Further, the peak hour in 2025 was 02:00 in the early hours of Saturday rather than 01:00 in the early hours of Sunday in 2022. In 2022 the second highest flow was Saturday midnight, in 2025 this is Saturday 22:00.

**Rank usage**

Some 1,677 different activities were observed at the rank during the course of the three days' observations in September 2025. 30% of the events were pedestrian arrivals, 1% pedestrians apparently leaving the rank without taking a hackney carriage (28 people in total), and 69% related to vehicles observed.

In terms of vehicles observed, of the 1,154 observations (1,229 in 2022) 83% were hackney carriages (95% 2022 and 96% 2019), 10% emergency vehicles, 5% private cars (3% in 2022), 2% goods and just two vehicles were private hire. This suggests the rank is fairly well-observed by other vehicles, although perhaps a little less than in 2022, although the level of use by emergency vehicles appears high.

**Plate activity levels**

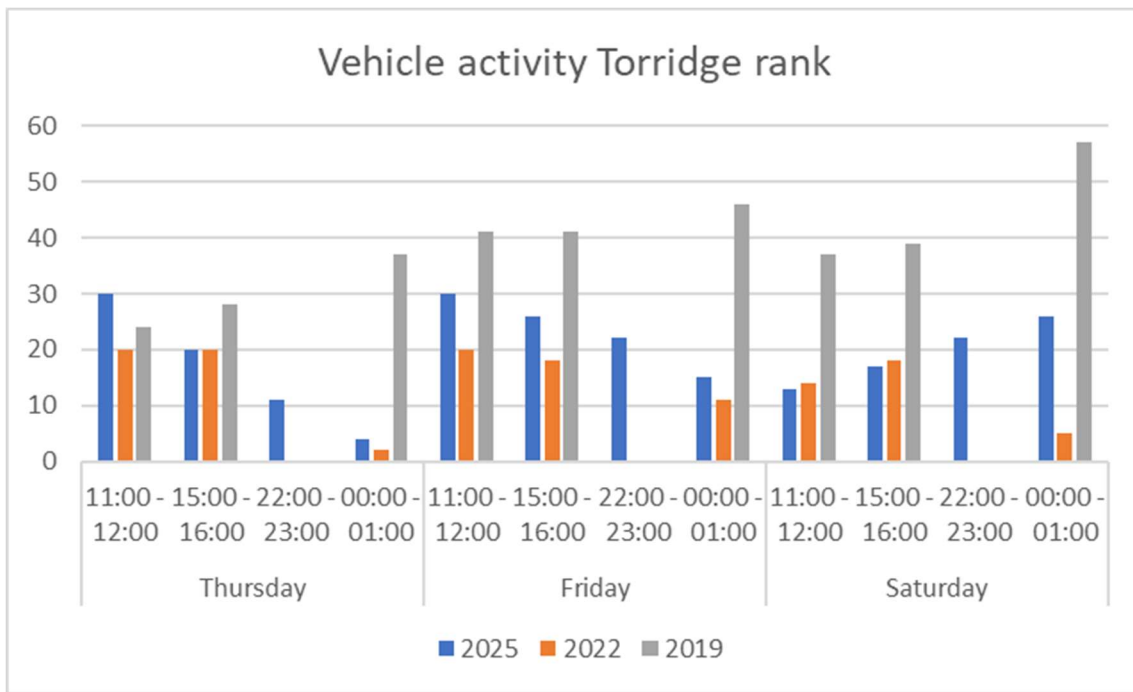
To understand the level of vehicles active from the hackney carriage fleet, sample observations were undertaken to identify the proportion of plates active at three different times on all three different survey days. The proportion was taken of the 46 plates available for rank service, excluding the three specific plates unlikely to ever see use at the rank.

Of the 304 observations made, 87% were identified as Torridge hackney carriages, 9% Torridge Private hire and 4% were other registration plates not identified. Attempts were made to match to other nearby areas but information was not available at a sufficient level to allow any certain identification of these plates.

Over all three days and each period within each day 70% (64% 2022, 83% 2019, 81% 2012, 90% 2008) of the fleet was observed active. This is an increase from 2022 but still less than proportions seen in the three earlier surveys.

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 results.

	Year	Thursday	Friday	Saturday
Morning	2025	30	30	13
	2022	20	20	14
	2019	24	41	37
Afternoon	2025	20	26	17
	2022	20	18	18
	2019	28	41	39
Night	2025	11	22	22
Midnight hour	2025	4	15	26
	2022	2	11	5
	2019	37	46	57



The profile of active plates shows that 2025 is a strong improvement over the levels in 2022. However, this still does not match levels observed in 2019. In 2025, Thursday and Friday see reducing levels of activity as the day progresses. This is reversed on the Saturday, with the most notable change from 2022 being much more activity in the hour after midnight on the Saturday. However, the highest levels of plate activity are mornings, although Friday afternoon and Saturday after midnight see the second highest levels of activity.

Considering the activity level of specific vehicles, the most frequent vehicle was seen in eight of the twelve periods, including all Friday and Saturday periods apart from the night period on the Saturday. In 2022 the most frequent vehicle was seen in six of the nine periods.

The most frequent vehicle was seen 20 times; another 18, three 15 times. The highest share, 13% of the fleet, were seen 11 times over the three days. Nine plates (19% of the fleet) were seen in both of the two later periods on the Saturday. This compared to 13% seen both Friday late periods and just 4% the two later periods on Thursday.

### ***Existence of unmet demand***

The observed rank data was reviewed to identify the hours when unmet demand occurred. Of the 78 (72 in 2022) hours of rank observation, 38% (40% 2022 and 31% 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 23 (20.5 in 2022 and 9.5 in 2019) minutes. The length of passenger waits has also tended to spread out with 15 (14 2022 and none 2019) waiting 11 minutes or more, 24 (28 2022 and 5 2019) six to 10 and 71 (56 2022 and 84 2019) between one and five minutes.

Of the hours when there was average passenger delay (APD), 70% (66% 2022) saw APD of a minute or more. Four hours (one in 2022) saw APD over five minutes. There were two cases when four consecutive hours saw APD – the 15:00 to 18:00 hours on the Thursday and the 17:00 to 20:00 hours on the Friday. Saturday saw just three consecutive hours at worst, from the midnight hour to the 02:00 hour.

62% (36% 2022 and 7% 2019) of all passengers travelled in hours when there was an average passenger delay – and there was unmet demand in 63% (56% 2022 and 50% in 2019) of surveyed off peak hours.

Friday/Saturday accounted for 45% of total delay, Saturday/Sunday 42% and Thursday/Friday 13%.

A further test was undertaken to identify the level of unmet demand arising from periods when passenger numbers in the hour were low – nine or less total passengers. These hours accounted for 49% of all delay. Such hours are often termed ‘thin demand’ and can be much harder to serve. Further, a review of these journeys found just 91 vehicle departures resulted, with an occupancy of 1.3 persons, further reducing the income provided by these hours.

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, 33% (30% 2022) appeared to be wheelchair accessible style vehicles (WAV). This is much higher than the 8% (4% 2022) 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 and a little more also than in 2022.

However, a counter observation to this is that, as in 2016 and 2022, there were no persons observed accessing hackney carriages at the rank in wheelchairs during the full survey. However, there were three (six in 2022) 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!, as in previous surveys. In 2025 a total of 226 interviews were completed, compared to 203 in 2022. A third of interviews were on a Monday, 43% on a Tuesday and the remaining 24% on a Wednesday (May 2022 saw interviews on Tuesdays and Thursdays). In 2019 and 2022 it proved hard to obtain a sample of 50 in Holsworthy and Westward Ho!, in 2025 the difficulty remained with Holsworthy but Torrington also proved difficult whilst a larger sample was obtained in Westward Ho! For 2025, 41% of surveys were at Bideford Quay, 24% on the Sea Front at Westward Ho!, 19% near Torrington Church and 15% near Holsworthy Library.

The present response sample obtained was compared to the latest national estimate of 2023 population structure (from the new census initial information)(at 2023). Less males were interviewed than in the population figures (40% (46% 2022) compared to 48% for the local census population). Our sample included marginally more under 30's (17% compared to 15%, as in 2022), but this time less mid group (21% compared to 33%, with 42% compared to 32% in 2022, the opposite way round), with correspondingly more (less in 2022) of the upper age group (62% compared to 52%, with 41% compared to 53% in 2022). This was a fairly similar sample and comparison to that undertaken in both 2019 and 2016.

79% (83% 2022 and 2019 but 96% 2016) said they lived in the Torridge Council area. The highest proportion not from the area were those in Westward Ho!, where 45% were not from the area. Whilst many were from the West Country the 2025 sample did include quite a few more distant persons, including several from Glasgow and one from America.

33% (24% 2022, 37% 2019, 46% 2016 and 34% 2012) said they had used a local licensed vehicle in the last three months. For this survey, this share was split between 7% (4% 2022) saying they had used hackney carriage only, 19% (14% 2022) private hire only and 7% (5% 2022) by either kind of vehicle. Levels of all licensed vehicle quoted usage were higher in Bideford (11%, 29% and 14% respectively) than in Holsworthy, Torrington or Westward Ho! as might be expected. Use of hackney carriages only was 2% in Westward Ho!, 3% in Holsworthy and 7% in Torrington.

People told us how often they used a local licensed vehicle. The largest proportion, 42% (22% 2022 and 23% 2019) said once or twice yearly (and this was the largest share for all areas in 2025), followed by 28% (57% 2022 and 44% 2019), saying never.

The resulting estimate of trips per person per month is 1.0 (0.3 2022 and 0.8 in 2019). The hackney carriage specific value of 0.4 (0.2 2022) suggests that 36% (81% 2022, 58% 2019 and 55% 2016) of licensed vehicle usage is by hackney carriage. As with the previous question, Bideford's value was 2.0 and 44% compared to values between 0.2 and 0.5 for the other three locations.

For 2025, 8% could not remember seeing a hackney carriage in the area (19% in Torrington, 5-6% in the other areas). 53% (58% 2022 and 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 (21% (23% 2022) of those responding).

Most people told us how they got licensed vehicles in the area. The highest option with 80% (58% 2022 and 60% 2019) of responses was phone. This value was lowest in Bideford (72%), higher at 84% in both Holsworthy and Torrington and highest in Westward Ho! at 97%.

14% (33% 2022, 31% 2019 and 39% 2016) said at a rank, none (none, 2022 and 8% 2019) said a freephone and 2% (none 2022 and 1% 2019) said hailing – although this was only mentioned in Bideford (4%). In this survey 3% (as in 2022) suggested they used apps and 1% (6% 2022) other methods (visiting a taxi office). The use of ranks overall seems much diminished compared to 2022 and earlier.

34% (33% 2022) of all respondents named one or more companies they used if they booked a vehicle. Of these, 8% (4% 2022) named three, 21% (51% 2022) two and 71% (45%) one company.

In terms of companies named, the number in 2025 was the highest ever, at some 26 different companies. The previous numbers were 7, 2022, 15 in 2016 and 12 in 2019.

Across the area, the top company gained 36% of all mentions, although this was much lower than its 49% share in 2022 (which was less than in 2016 but more than in 2019). It was also dominant in Westward Ho! and Bideford. The second company overall gained 12% of mentions, also less than in 2022. All other companies gained 6% or less of current mentions. The third company gained from its level of mention in 2022. The next two highest mentioned companies were two that were North Devon based, gaining 6% and 5% overall.

The company with highest scores (but equal with another) in Torrington which gained just 3% this time was one that we were advised had ceased to trade. It had scored much higher in 2022 (19%). Two Cornwall and one Exeter companies were named, but just by one person. Two informal taxi operations were mentioned by one person each, one in Holsworthy and one in Torrington.

The numbers suggest relatively high levels of competition but also continued variation amongst the area, with more local provision remaining but the largest company remaining dominant, albeit not as much.

The only app mentioned was an international one, and this was only mentioned by three people.

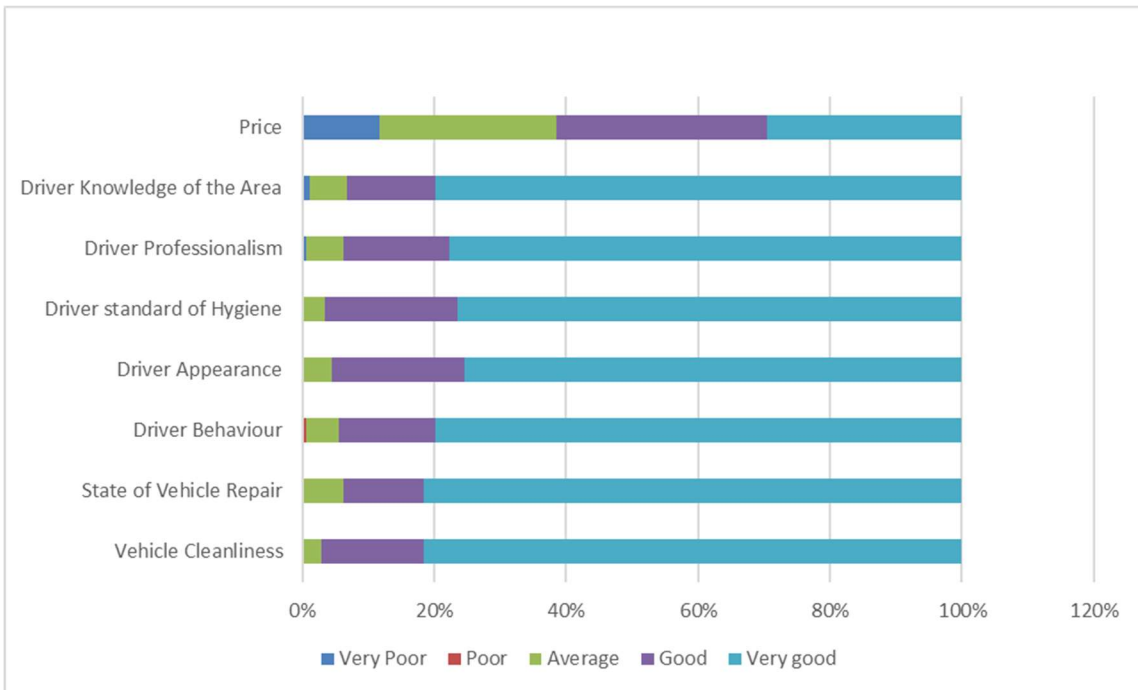
94% (58% 2022 and 32% in 2019) of those interviewed were aware of the Bideford Quay rank. Of these, 50% (31% 2022, 74% 2019) said they used it. This time, 98% of those in Bideford correctly named the rank as The Quay, but other places termed it 'Bideford'. A third mentioned The Square in Holsworthy in the sample for that location.

With regard to various aspects of peoples last trip by licensed vehicle, 80% (41% 2022 and 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 (again). The continued upward scores for service levels continue from 2022. Now only price has any scores where 'very good' is not dominant.

In all cases in 2025 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. Vehicle cleanliness and vehicle repair now scored 82% very good overall, with driver appearance lowest at 75% very good.

The overall picture for the full response is shown below graphically:



There were just 23 responses giving more information for areas scored very poor. Most referenced them being too expensive.

In terms of matters that might encourage more use of hackney carriages, the highest score, in 2025 was 77% (38% 2022, 21% cheaper fares 2019) saying if they were more affordable. More hackney carriages to phone for was the next highest – but just 6% said this – shared between Torrington and Westward Ho!. One person sought more WAV style vehicles and one more deaf-friendly services. Eleven said they would use hackney carriages if their current transport was not available.

Respondents told us if they, or anyone they knew, needed a vehicle adapted for a disability. The response was a reduced 79% (90% 2022, 85% in 2019 and 81% 2016) saying no, suggesting more need for such vehicles at the present time. Where a vehicle was needed, the strong balance (19% compared to 1% in 2025, 10% compared to nothing 2022, 13% compared to 2% in 2019) was in favour of fully wheelchair accessible style vehicles.

With reference to giving up waiting at a rank, 30 said they had, much higher than the two of 2022. Of these, half named the Quay rank as the location, with a further 18% saying 'Bideford'. Other places were not current rank locations. This suggests a latent demand value of 9%, more than the 1.1% of 2022 and the 0.5% of 2019).

In another manner, 44% (54% 2022) said they felt there were enough hackney carriages in Torridge, with 56% (3%) saying there were not. None (43% 2022) said they did not know.

All those interviewed told us if they relied on licensed vehicles for any particular elements of life. 16% (14% 2022) said there were specific elements. 54% (24% 2022) of responses were for hospital visits, 14% work (none 2022), and 6% each for school run or shopping (latter was 19% 2022). No mention was made re nights out (14% 2022 nor visiting friends and relatives (10%) but single mentions were given for family activity, hairdresser/dentist, clubbing, mobility centre, bingo, social club and football.

## 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

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 received.

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.

This is a normal current reaction to these consultations.



## 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, 163 invitations (134 letters in 2022) were sent out on our behalf by the Council. There were a total of 28 (21 in 2022) responses, 17% (16% 2022 and 2019, less 2016 but higher in 2012), which is an excellent level for this kind of survey.

39% (62% 2022) of those responding told us their main source of income was the licensed vehicle trade. 32% (29% 2022) were part time and had other additional income with the final 29% (9% 2022) being part time with no other income. This is a big change towards part-time working for 2025 results.

Of the responses provided, 46% (67% 2022 and 2019) were from hackney carriage drivers, 4% (14% 2022 and 24% 2019) from those that said they drove both kinds of vehicle, and 50% (19% 2022 and 10% 2019) from those driving only private hire.

Taking all responses, the average level of service was 11 (13 2022 and 14 2019) years, ranging from one to 38 (35 2022 and 33 2019) years (showing an ageing driver cohort). When considered in terms of blocks of five years, the most common block saw 46% quoting between one and five years, 14% between six and ten and 11% each for 36-40 and 16-20 years. The hackney carriage respondents had an average level of service of 20 years compared to the 3 years for those saying they drove private hire only. There was only one 'drive both' response.

In terms of working weeks, all the private hire said five days. Hackney carriage drivers were more variable, with a quarter each working four, five or six days (32% each for five and six for 2022, and 42% for six days in 2019) with a range of two to seven days (as in 2022, but 3-7 in 2019), with an average of five days (as in 2022, with 6 in 2019) and 34 (36 2022 and 43 2019 ) hours (up to 60 range, 98 in 2022). This suggests a continued reduction in the overall working week. The average private hire week was just under 21 hours with a maximum quoted of 30 this time.

The periods worked confirmed that the private hire respondents all worked Monday to Friday days only. Hackney carriages shared their time out more equitably, with 21% of quoted periods in the morning, 34% afternoon, 25% evening and 20% overnight. In terms of days, lowest was 10% for Sundays, then 12% for Wednesday, 13% for Monday, 14% for Tuesday and Thursday, 17% for Saturday with a fifth of quoted periods being on a Friday.

Of those telling us reasons why they worked when they did, 53% said they worked when their school contracts required. This covered all the private hire respondents, the dual driver and five of the 13 (38%) of the hackney carriage respondents.

One person (5%) said they worked when needed at the rank or from customer feedback of main times hackney carriages were needed; 11% said 'personal choice' and a further 11% to avoid busy traffic.

In terms of kinds of work undertaken, 15% of the hackney carriages said they only undertook schools work and confirmed this saying all their work was from this source. 23% (29% 2022) worked the ranks only, with one totally rank-based and two others getting small amounts from either hailing or from hailing and bookings. Two others (15%) said they worked from ranks, took immediate bookings and advanced bookings; three others also added schools work for between 25% and 60% of their work. Two said they undertook immediate hire bookings only but in the statistics said they obtained 60-75% of work from ranks. There was a response from one of the Clovelly land rover taxi service drivers.

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.

None of the private hire drivers owned their own vehicle. 36% said someone else also drove their vehicle but none said when.

Of the hackney carriages, two thirds owned their vehicle. One of these said someone else drove it as well. For those not owning, two said others drove that same vehicle.

83% of the hackney carriage respondents that replied said they felt there were enough hackney carriages now. 60% of private hire agreed, 40% did not although the question was not really relevant to their work.

Seven of the private hire were in favour of retaining the limit, with two saying this kept their quality high and also reduced congestion at ranks. 83% of the hackney carriages were in favour, with five giving reasons including it encouraged drivers to service the rank, ensured known drivers and three saying it maintained service standards. One driver opposing limits said they felt there were not enough drivers but they also only undertook schools work.

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. Nearly all said 'never'; with the only exceptions being yearly for both wheelchair bound and wheelchair transferring customers at ranks.

The main other comments were two hackney carriages asking for ranks in Westward Ho! and Appledore and restoration of those removed from Torrington and Holsworthy without explanation. One suggested need for temporary ranks for events, and another pointed out that the Quay rank was often closed when the road was closed for an event, which seemed to becoming more regular.

Two mentioned a need for better enforcement against other vehicles that used the ranks when a hackney carriage was not there.



## **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 2025 information alongside the results from previous surveys.

Element	2025	2022	2019	Test	2017	2016	2012	2008
Average wait (mins)	1.2	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	0.5	1	1
% Queues in weekday daytime hours	62.5	56.3	50	12.5	25	50	0	0
% pass in hours with waiting over 1 minute	38.1	35.6	7.28	7.28	7.874	6	0	0.94
Latent demand	1.09	1.011	1.005	1.005	1.055	1.055	1.038	n/k
Overall index	1557	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, for the second survey running. Average passenger waiting time has increased from just under half a minute in 2019 to just under a minute in 2022 to 1.2 minutes now. The level of off-peak waiting has increased again as has the proportion of passengers travelling in hours when there is a minute or more average passenger delay. Latent demand is 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.

The main driver of the level of significance is the proportion of people travelling in weekday daytime hours with unmet demand.

Additional review found that 45% of total delay was on a Friday and 42% on a Saturday (counting from morning to morning, e.g. 06:00 Friday to 05:59 Saturday).

49% of total delay occurred in hours where there were nine or less passengers – times of ‘thin demand’ where it is hard for a vehicle fleet to meet demand – this covered 19 of the survey hours. In terms of total number of hours in 2025 with passenger flows nine or less, there are now 39 such hours, with this increased from the 29 of 2022, making the opportunity for such thin demand to lead to unmet demand that much greater.

The worst delay hour was Friday at 20:00 which saw 13 passengers travelling of which 11 experienced waits, with the worst wait being over 19 minutes, totalling nearly 1.5 hours of delay. However, there were other hours with higher passenger flows that saw less total delay, e.g. Saturday 02:00 with 36 passengers saw just 51 minutes delay in total (this was the peak passenger flow hour).

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 undertaken in September 2025. This was at a different time to the two previous surveys which saw rank work in May each year. This change arose due to procurement delays and then issues with temporary roadworks preventing earlier rank surveys. 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 increased before the last survey after a small dip against the national trend which is believed to be related to a growth in vehicles servicing school contracts. Since the last survey, a small number of hackney carriages ceased to operate, but for the time of this survey the fleet was back to its full strength of 49 (including three plates rarely if ever likely to service ranks, the Clovelly Taxi Bus vehicles).

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 now at the lowest level since when statistics were first published.

The fleet now has four wheelchair accessible style vehicles all of which are in the hackney carriage fleet. Given the small overall fleet size, this face value of 8% of the hackney carriage fleet puts Torridge above the Government action target of 5%, but also places it with 41% of authorities having less hackney carriage WAV than Torridge when considering only 'mixed' fleet hackney carriage WAV proportions.

**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. This has not changed since the previous survey.

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 2025, the estimated weekly patronage of the rank is 914 passengers. This is 23% lower than in 2022 and 39% of the (peak) 2016 level. The reduction is less than that between the last two surveys but still implies rank patronage levels very hard to provide any fleet with sufficient demand.

The 2025 rank survey saw most reduction on Thursdays (29% less), followed by Saturday down 23% and Friday just 8%. Notwithstanding this, there remains an overall remarkable similarity between the 2022 and 2025 flow profiles. The notable difference is that both Friday and Saturday profiles show two peaks compared to the one on each day in 2022. This means the peak to average flow is now the highest ever at 5.2.

The average flow level over all hours has reduced from 19 in 2016, 14.5 in 2019, 9 in 2022 to just 7 passengers per hour in 2025. 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 rank remains very little abused by other vehicles, with 83% (was 95% in 2022) of all observed vehicle movements being hackney carriages. For 2025, the main 'other' vehicle usage was 10% by emergency vehicles, which seems a very high level.

Tests of fleet activity levels across the survey days show the proportion of vehicles active at the rank to have increased to 70% from 64% in 2022, but still remaining short of the higher levels seen in previous surveys (between 81% and 90%).

There has been a fairly strong improvement of activity levels since 2022 particularly more activity in the hour after midnight in the Saturday / Sunday observations this time.

The reduced demand for vehicles but the increase in activity has reduced the level of hours when unmet demand occurred, but only from 40% to 38%. However, the maximum wait by a passenger increased, and the length of passenger waits also widened, together with 70% of hours with average passenger delay (APD) being ones that had APD of 1 or more. The share of passenger travelling in hours with APD of any size was strongly increased from 36% in 2022 to 62% now.

The overall picture is a further much worsened service to the reduced level of public demand at the rank even than in 2022, despite more vehicles appearing to be active.

Although 33% of vehicles observed at the rank appeared to be wheelchair accessible, much higher than the 8% in the real rank fleet, no-one was seen using a wheelchair to access any vehicle at the rank, although there were three (reduced from six in 2022) people with other observable disabilities noted being assisted into vehicles at the rank.

### ***On street public views***

A generally representative sample of 226 persons was interviewed in four locations across the District, with 79% saying they were from the area (marginally lower than in 2022). 33% (increased from 24% in 2022) said they had used a local licensed vehicle in the last three months. 7% said they had used hackney carriage only, 19% private hire only and 7% had used either kind of vehicle, all increased from 2022 with the reduction in those saying they had not used licensed vehicles.

It was estimated that there are 1.0 (was 0.3 in 2022) licensed vehicle trips per person per month with 36% (was 81%) of these undertaken in hackney carriages. 8% of those interviewed said they could not remember when they last saw a hackney carriage in the area, a strong increase from 2022, with 53% (58% in 2022) of the hackney carriage respondents saying they could not remember when they last used one.

80% (58% 2019) said they got licensed vehicles by phone and 14% (33%) said rank. None (as in 2022) said freephone and 2% (none) hailing. For this 2025 survey, 3% said they used apps (similar to 2022) and 1% other methods, principally visiting a taxi office (reduced from 6% in 2022).

In terms of phoned-for vehicles, the highest number of companies were named this time, reversing the reducing trend from previous surveys. Shares for each company were reduced with five non-Torridge companies and two informal taxi operations mentioned.

94% (58%) of those interviewed were aware of the Bideford Quay rank with a higher 50% this time (was 31% in 2022) of these saying that 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. This is even when measured against the significant improvement found in 2022.

In terms of matters that might increase hackney carriage usage the main one was if they were more affordable – strongly increased from 38% in 2022 to 77% in 2025.

There appeared to be greater need for wheelchair accessible vehicles in this sample than in 2022, with the percentage saying they, or someone they knew, needed an adapted vehicle the highest level since records of surveys exist. Those needing such vehicles showed a very strong requirement for a fully wheelchair accessible style, and twice the level of 2022.

Latent demand was increased to 9%, vastly higher than the 1.1% of 2022 or the 0.5% of 2019.

The proportion feeling there were enough hackney carriage in Torridge had reduced from 54% in 2022 to 44% now, although part of this increase was that this time there were none that did not know (that had been 43% in 2022).

Of the 16% (14% 2022) of respondents who said they relied on licensed vehicles 54% (24% 2022) said hospital visits, 14% work (none, 2022), 6% (19% 2022) the weekly shop, and 6% for the school run. In 2025, none mentioned nights out (was 14%) or visiting friends and relatives (10%) although there were seven very specific activities mentioned that fell into those two categories.

### ***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 17% (marginally higher than in 2022) was an excellent level. 39% (62% 2022) were from those whose main source of income was the licensed vehicle trade, 32% (29% 2022) part time with other income and 29% (9% 2022) part time with no other income. This was partly explained by a reduced 46% (67% 2022) being from hackney carriage drivers and an increased 50% from private hire (was just 19%).

Average level of service was 11 (reduced from 13 in 2022 and 14 in 2019) years on average but the longest serving driver now had 38 years (35 in 2022). There was a sharp contrast between the 20 years average service of hackney carriage drivers and the three years of those that only drove private hire.

The average working week was five days and 34 hours (reduced again from the five days and 36 hours in 2022 and six days and 43 hours in 2019) for hackney carriages with a range up to 60 hours (98 hours, 2022, 60, 2019). The private hire drivers all worked five days with an average working week under 21 hours and a maximum of 30 (these were all school contract drivers, as in 2022). The one dual driver and 38% of the hackney carriages also worked on school contracts. In terms of work undertaken, 15% of the hackney carriages only worked on school contracts.

23% (29% 2022) only worked the ranks. The remainder added other work to rank work apart from those only undertaking school contracts. This survey saw a response from one of the drivers of the Clovelly land rover taxi bus service.

Unusually for private hire, none of the respondents said they owned their own vehicle, with two thirds of hackney carriage drivers saying they owned the vehicle they drove.

83% of hackney carriage and 60% of private hire felt there were enough hackney carriages in the area now. 83% of hackney carriage and seven of the private hire supported the limit on hackney carriage vehicle numbers.

Benefits of the limit included:

- Keeping quality high
- Reducing potential congestion at the rank
- Encouraging drivers to service the rank
- Ensures known drivers
- Maintained service standards

One hackney carriage opposed the limit, but also stated they only undertook schools contracts.

Two hackney carriage respondents sought ranks in Westward Ho! and Appledore and return of those removed from Torrington and Holsworthy. In this regard, the Council advised that limited space was available and that other elements of the council opposed the loss of parking revenue with the low likelihood of use implying a poor value for money decision. The issue of the present unmet demand at the main rank could also be worsened were vehicles drawn to serve these other areas.

Suggestion was made for temporary ranks when events occurred, and concern raised about the more regular closure of the main Bideford rank on such occasions. The Council advised us there are about four major events, and that for three of these a temporary rank is provided at the Post Office end of the Quay area. The other event is the Carnival which covers the full length of the Quay, but also only sees closure for the afternoon and evening.

Two drivers asked for better enforcement of the rank against other vehicles that tended to use it if a hackney carriage was not present.

### ***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 (again, since 2022), with the average passenger wait now 1.2 minutes with all the other factors increasing, with the highest change being the latent demand factor rising from 1.011 to 1.09.

Review found that 49% of total delay time was attributed to the 19 hours when passenger flows were nine or less that had delay (thin demand).

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 with rank work in September 2025, later than that for the previous two surveys. Estimated weekly passenger demand has reduced a further 23% since 2022 and is now just 39% of the peak recorded level in 2016. Despite the reduction, flow profiles remain similar to 2022, but with greatest reductions this time for Thursday flows. The peak to average flow ratio is now the highest ever observed, at some 5.2, which makes adequate servicing of demand for a given fleet more difficult.

Average passenger flows per hour are now just seven per hour compared to 19 in 2016, with the same size fleet. This is very low demand. Fleet activity in this survey was higher than in 2022 in terms of the number of different vehicles from the fleet observed. Despite the increased level of significance of unmet demand, the public view of the service, which was generally very good, is now even more so. The main issue that would increase use more would be if they were more affordable.

Apparent need for WAV style vehicles as well as latent demand were both increased. Less people felt there were enough hackney carriages now. Some of the hackney carriage respondents only worked the rank, whilst there were some that only undertook school contracts. 83% of hackney carriages and seven of the private hire respondents supported the limit on hackney carriage vehicle numbers and gave valid reasons for its benefit.

Review of the delay times found 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. This type of delay accounted for 49% of all delay time.

### ***Conclusions***

Public views of the overall service continue to strengthen although formal levels of service indicators have again worsened. The rank continues to see good levels of usage, although again reduced. This has meant that more of the operating hours now see ‘thin’ demand which is hard for vehicles to meet cost-effectively as their waiting times increase with such demand, reducing supply.

The rank also appears to see much disruption, which makes focussing a living on the rank much more difficult.

Although the classic response to high and increasing levels of significance of unmet demand is to add more licences, in this case we consider any such action would be counter-productive as new plates would seek to maximise their return by servicing busy times which could discourage current vehicles from continuing to serve quieter periods.



## 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. This conclusion remains true although levels of unmet demand have increased since 2022, the prime reason perversely being reduction in the level of passengers, and the consequent increase in hours of 'thin demand' for which providing service is increasingly challenging.

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. It may be necessary to encourage companies that use hackney carriages to encourage more vehicles to wait at the ranks but giving them first call for bookings whilst ensuring the next available vehicle is sent to the rank to replace that vehicle.

The Council also needs to discuss with the trade possible methods by which priority can be given by hackney carriages to servicing the rank, the prime reason that hackney carriage plates are granted. More detailed information from the survey could be used to inform these discussions.