Hyndburn Borough Council

Hackney carriage unmet demand survey

September 2018

Executive Summary

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

The survey undertook a wide ranging review, including a high level of rank observations, discussion with people in the streets of the Borough, with key stakeholders and with those providing the operating side of the trade. It found that overall demand for hackney carriages at ranks had reduced by around 33% since 2012, and that this was likely to have fallen further given recent changes to night life.

However, the Union Street shopping centre rank provided a much rosier picture, having seen growth in use since 2012, to the extent that some unmet demand has arisen around lunch time, but not to any significant degree. The rank was also excellent in seeing real use by those with disabilities including those in wheel chairs.

Other than this rank, and some late night demand (some of which may now have gone), some other potentially hackney carriage demand is service by booking offices near to ranks. In these locations passengers ignore hackney carriages waiting without drivers to enter the offices, which is a concern.

Overall, there is no unmet demand in the area which is significant, covering both latent and patent demand, and the current limit can be retained. The option exists to extinguish the two currently unissued hackney carriage plates as our evaluation stands for the level of 60 available plates at the time of the survey.

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1 General introduction and background

Hyndburn Borough Council is responsible for the licensing of hackney carriage and private hire vehicles operating within the Council area and is the licensing authority for this complete area. Further details of the local application of Section 16 of the 1985 Transport Act with regard to limiting hackney carriage vehicle numbers is provided in further Chapters of this report. Hackney carriage vehicle licences are the only part of licensing where such a stipulation occurs and there is no legal means by which either private hire vehicle numbers, private hire or hackney carriage driver numbers, or the number of private hire operators can be limited.

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

Current hackney carriage, private hire and operator licensing is undertaken within the legal frameworks first set by the Town Polices Clause Act 1847 (TPCA), amended and supplemented by various following legislation including the Transport Act 1985, Section 16 in regard to hackney carriage vehicle limits, and by the Local Government Miscellaneous Provisions Act 1976 with reference to private hire vehicles and operations. This latter Act saw application of regulation to the then growing private hire sector which had not been previously part of the TPCA. Many of the aspects of these laws have been tested and refined by other more recent legislation and more importantly through case law.

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

The legislation around licensed vehicles and their drivers has been the subject of many attempts at review. The limiting of hackney carriage vehicle numbers has been a particular concern as it is often considered to be a restrictive practice and against natural economic trends. The current BPG in fact says "most local licensing authorities do not impose quantity restrictions, the Department regards that as best practice". The three most recent reviews were by the Office of Fair Trading in 2003, through the production of the BPG in 2010, and the Law Commission review which published its results in 2014. None of these resulted in any material change to the legislation involved in licensing.

At the time of writing this report an All Party Parliamentary Group is considering taxi policy matters and has produced interim results (July 2017), but the main results are still some way in the future. Other groups have provided comment but the upshot remains no change in legislation from that already stated above.

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

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

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

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

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.

Some of the application has differed between Scottish and English authority's. This is mainly due to some court cases in Scotland taking interpretation of the duty of the licensing authority further than is usual in England and Wales, requiring current knowledge of the status of unmet demand at all times, rather than just at the snap-shot taken every three years. However, the three year survey horizon has become generally accepted given the advice of the BPG and most locations that review regularly do within that timescale.

The DfT asked in writing in 2004 for all licensing authorities with quantity restrictions to review them, publish their justification by March 2005, and then review at least every three years since then. In due course, this led to a summary of the government guidance which was last updated in England and Wales in 2010 (but more recently in Scotland).

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

The most recent changes in legislation regarding licensed vehicles have been enactment of the parts of the Equality Act related to guidance dogs (sections 168 to 171, enacted in October 2010), the two clauses of the Deregulation Act which were successful in proceeding, relating to length of period each license covers and to allowing operators to transfer work across borders (enacted in October 2015), and most recently enactment of Sections 165 and 167 of the Equality Act, albeit on a permissive basis (see below).

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

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

This was enacted from April 2017. There remains no confirmation of any timetable for instigating either the remainder of the Equality Act or the Law Commission recommendations, or for the update of the BPG.

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

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

In general, industry standards suggest (but specifically do not mandate in any way) that the determination of conclusions about significance of unmet demand should take into account the practicability of improving the standard of service through the increase of supply of vehicles. It is also felt important to have consistent treatment of authorities as well as for the same authority over time, although apart from the general guidance of the BPG there is no clear stipulations as to what this means in reality, and certainly no mandatory nor significant court guidance in this regard.

At the present time, there is an active All Party Parliamentary Group considering issues regarding hackney carriage and private hire licensing that are considered to be current and critical. Their discussions are ongoing. 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.

In conclusion, the present legislation in England and Wales sees public fare-paying passenger carrying vehicles firstly split by passenger capacity. All vehicles able to carry nine or more passengers are dealt with under national public service vehicle licensing. Local licensing authorities only have jurisdiction over vehicles carrying eight or less passengers. Further, the jurisdiction focusses on the vehicles, drivers and operators but rarely extends to the physical infrastructure these use (principally ranks).

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

Drivers can either be split between ability to drive either hackney carriage or private hire, or be 'dual', allowed to drive either kind of vehicle. Whilst a private hire driver can only take bookings via an operator, with the 'triple-lock' applying that the vehicle, driver and operator must all be with the same authority, a hackney carriage driver can accept bookings on-street or by phone without the same stipulation required for private hire.

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

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

Further, introduction of recent methods of obtaining vehicles, principally using 'apps' on mobile phones have also led to confusion as to how 'apps' usage sits with present legislation.

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

2 Local background and context

Key dates for this Hackney carriage unmet demand survey for Hyndburn Borough Council are:

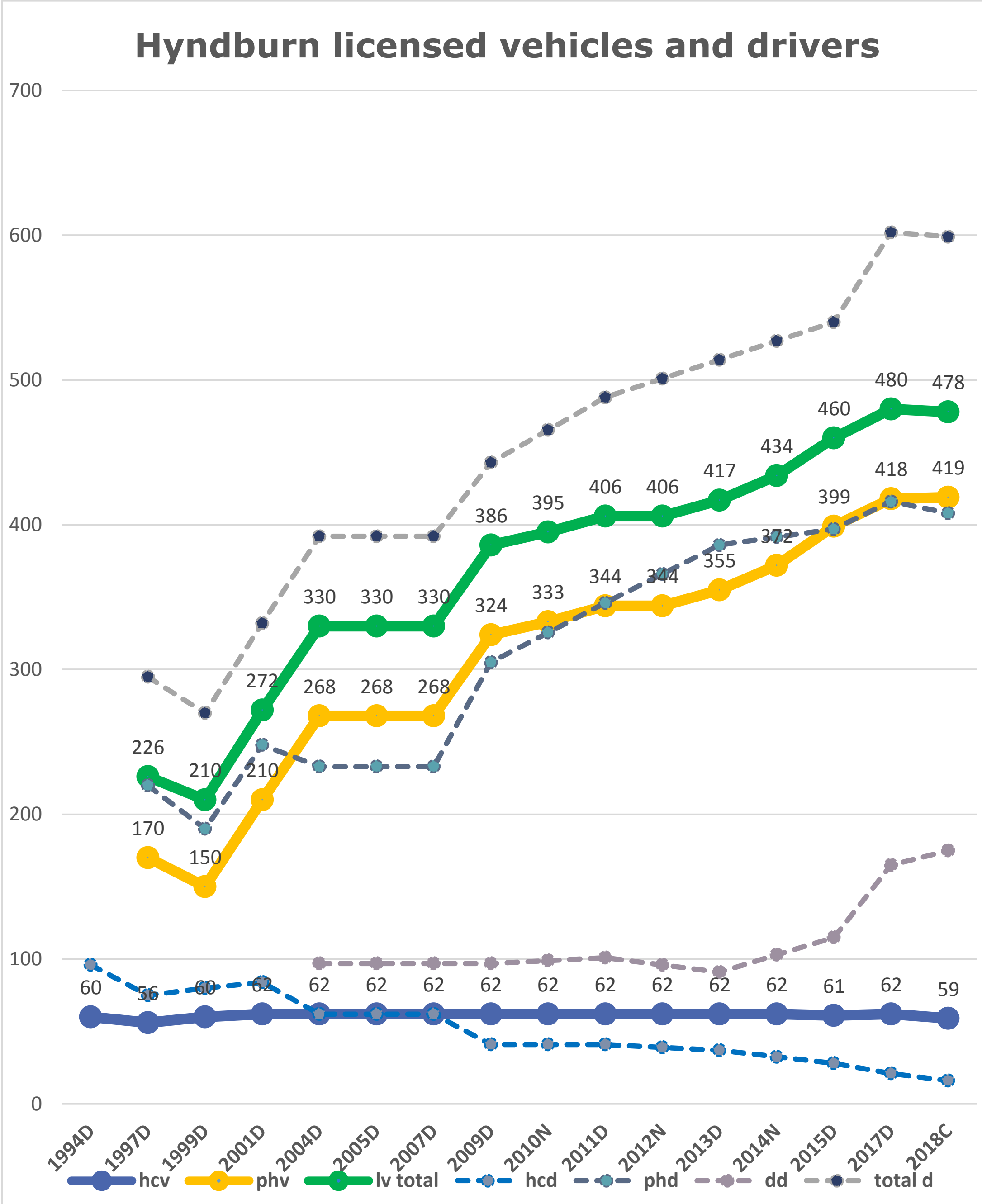
- appointed Licensed Vehicle Surveys and Assessment (LVSA) on 1st May 2018
- in accordance with our proposal of January 2018
- as confirmed during the inception meeting for the survey held on 23rd May 2018
- this survey was carried out between June and September 2018
- On street pedestrian survey work occurred in June 2018
- the video rank observations occurred in mid to late June 2018
- Licensed vehicle driver opinions and operating practices were canvassed using an all-driver survey undertaken throughout July 2018
- Key stakeholders were consulted throughout the period of the survey
- A draft of this Final Report was reviewed by the client during September 2018
- and reported to the appropriate Council committee.

Hyndburn Borough Council is a Borough Council which sees Lancashire County Council as its higher tier authority. The authority has a current population of 79,700 using the 2018 estimates currently available from the 2011 census. This is slightly less than the 80,700 quoted for 2011 for the 2012 survey. Hyndburn was formed in 1974 amalgamating Accrington Borough, five urban districts (Church, Clayton-le-Moors, Great Harwood, Oswaldtwistle and Rishton), and part of the Burnley Rural District. On formation, no zoning was applied to retain any former hackney carriage conditions from the previous authorities.

In terms of background council policy, Hyndburn Borough Council sees transport policy and highway powers provided by the higher tier authority, Lancashire County Council. This means that rank provision is ultimately undertaken by the higher tier Lancashire, except that Hyndburn has special provisions to provide taxi bays, particularly used where bays have daytime limited waiting restrictions but are available for overnight parking, and might therefore be useful to service part time, night, hackney carriage demand. It is understood that Hyndburn has used these powers to promptly provide for new night clubs in the past. Other than under these provisions, Lancashire works in conjunction with recommendations from Hyndburn establishes taxi ranks as part of an overall parking strategy. The special provisions need consent from the higher level authority but this is generally granted unless the County considers there is conflict with established parking restrictions.

All licensing authorities have full powers over licensing the vehicles, drivers and operators serving people within their area. Hyndburn Borough Council has chosen to utilize its power to limit hackney carriage vehicle numbers, and as far as we are aware has done so since 1998 according to dates quoted in the DfT statistics available.

By drawing together published statistics from both the Department for Transport (D) and the National Private Hire Association (N), supplemented by private information from the licensing authority records (C), recent trends in vehicle, driver and operator numbers can be observed. The detailed numbers supporting the picture below are provided in Appendix 1. Due to the comparative size, the operator figures are shown in the second picture.



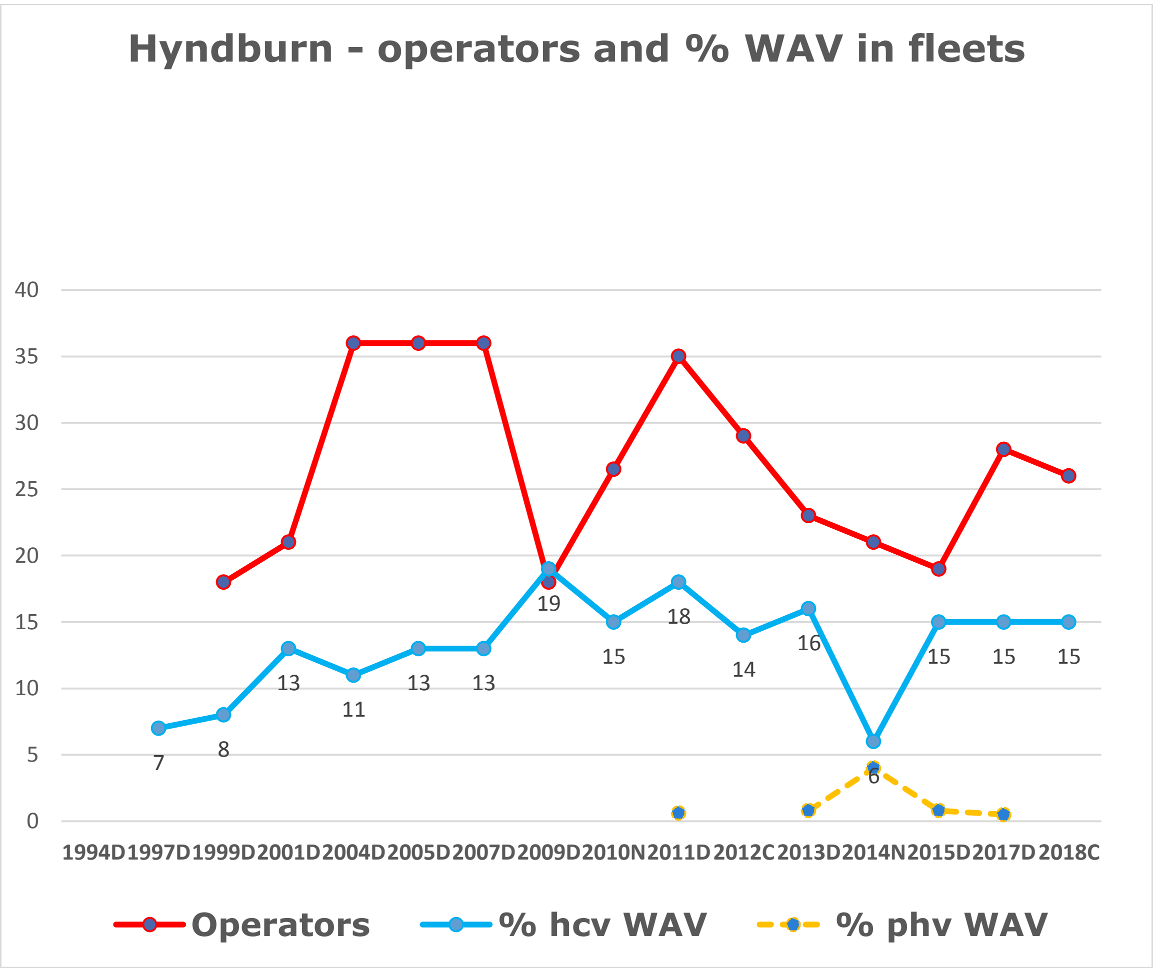
Licensing Statistics from 1994 to date

The graph above demonstrates how hackney carriage vehicle numbers have been restricted over the period considered. No additional plates have been added, with the current total being the level active at the time of the survey, with the limit still set at 62 vehicles.

Private hire vehicles have shown steady growth throughout the period for which statistics are available. However, this growth has been slightly reversed in the most recent information, with just a marginal increase of numbers seen in the last year.

Hackney carriage driver numbers have reduced on the basis of the introduction of dual driver licences, the take-up of which has been higher in recent years after the initial level of take-up early on. Similarly to vehicle numbers, overall driver numbers have increased year on year apart from in the last year, when there has been a slight decline.

Information is also available from these sources to show how the level of wheel chair accessible vehicles (WAV) has varied. It must be noted that in most cases the values for the private hire side tend to be much more approximate than those on the hackney carriage side, as there is no option to mandate for private hire being wheel chair accessible. In some areas, to strengthen the ability of the public to differentiate between the two parts of the licensed vehicle trade, licensing authorities might not allow any WAV in the private hire fleet at all.



Operator numbers and levels of WAV provision in the fleet

Operator numbers have fluctuated over time, but are presently reducing, and at a lower level than for many years, albeit there was a relatively large increase between 2015 and 2017, now partly reversed.

In terms of wheel chair accessible vehicles, there have been a few in the private hire element of the trade, but at a very low level, with the hackney carriage wheel chair element recently remaining constant at around 15% of the fleet. There have been some higher levels but not to any significant degree and this proportion seems to be relatively stable.

Hyndburn Borough Council undertakes regular review of its policy to limit hackney carriage vehicle numbers in line with the BPG. The previous survey was undertaken in 2012. There is no record of any previous surveys undertaken.

The Council produced a "Rules Regulations and Procedures for hackney carriage and private hire licensing" during 2017. This is a policy document adopted by the council to draw together information about how the service operates. It also includes the hackney carriage Byelaws. This requires a vehicle to wait at a hackney carriage rank when in service. It also makes clear that hackney carriages cannot charge more than the amount shown on the meter for journeys within Hyndburn, even if undertaken under private hire booking arrangements. Private hire fares should either be those agreed with the operator at time of booking, or from any fitted taximeter.

In terms of permitted vehicles, plates 54 to 62 must be either a London type hackney carriage or a suitable wheelchair accessible vehicle as approved by the Council. Plates 1 to 53 can be saloons, but must have swivel seats fitted. Any hackney carriage fulfilling a booking by a private hire operator must have company signs on the rear passenger doors for the relevant company. Private hire vehicles have additional stickers on the front doors clearly stating "Private hire vehicle – insurance invalid unless you pre-book this vehicle with a private hire firm" as well as the company stickers on the rear doors. No roof signs are allowed. There are exemptions available for executive and corporate account vehicles.

3 Patent demand measurement (rank surveys)

As already recorded in Chapter 2, control of provision of on-street ranks in Hyndburn Borough Council is mainly under the control of the higher tier, Lancashire County Council authority, although Hyndburn has used its delegated powers to arrange revised provision for night clubs in the past.

Our methodology involves a current review both in advance of submitting our proposal to undertake this Hackney carriage unmet demand survey and at the study inception meeting, together with site visits where considered necessary. This provides a valid and appropriate sample of rank coverage which is important to feed the numeric evaluation of the level of unmet demand, and its significance (see discussion in Chapter 7). The detailed specification of the hours included in the sample is provided in Appendix 2.

There is a map of ranks provided on the Hyndburn web site, which is best practice, and rare amongst licensing authorities. There is also a list of ranks within the current listed Licensing Policy, again best practice. However, a review at inception identified that the map does not show all ranks and that current detail is greater than shown on the list. The situation observed at inception was as follows (listed based on usage observed as described later):

Union Street – two parts around exit from Arndale Shopping Centre
Church Street – main section 24-hour, recently re-marked, plus 1800-0600 extension at southern end effectively covering most of this Street between Blackburn Road and Oak Street on the eastern side. (not on map)
Paxton Street – 24-hour rank near to northern foot exit from railway station (but see further below)
Willow Street – 1800-0800 rank near to (former) Voodoo night club (active on the Friday and Saturday of our survey) – revised rank at Eastern end replacing former long rank partly still marked to western end of street. (not on map)
Holme Street – 1800-0800 rank on almost full length of southern side of street.
Blackburn Road – 1800-0800 rank 43m East of Birch Street centreline for 38m easterly, on southern side of road – original rank but now under June 2017 powers following road re-surfacing
Peel Street – 24-hour rank well-marked near to Arndale Shopping Centre secondary exit (not on map)

Our visit confirmed that the former Cannon Street night club rank at the western end, southern side of the Street, though still marked, is effectively redundant as the club it served is not only closed, but has also become derelict.

We also identified a single space marked on the new Accrington station car park, which is Lancashire County Council land.

There are no ranks in any other part of the Borough.

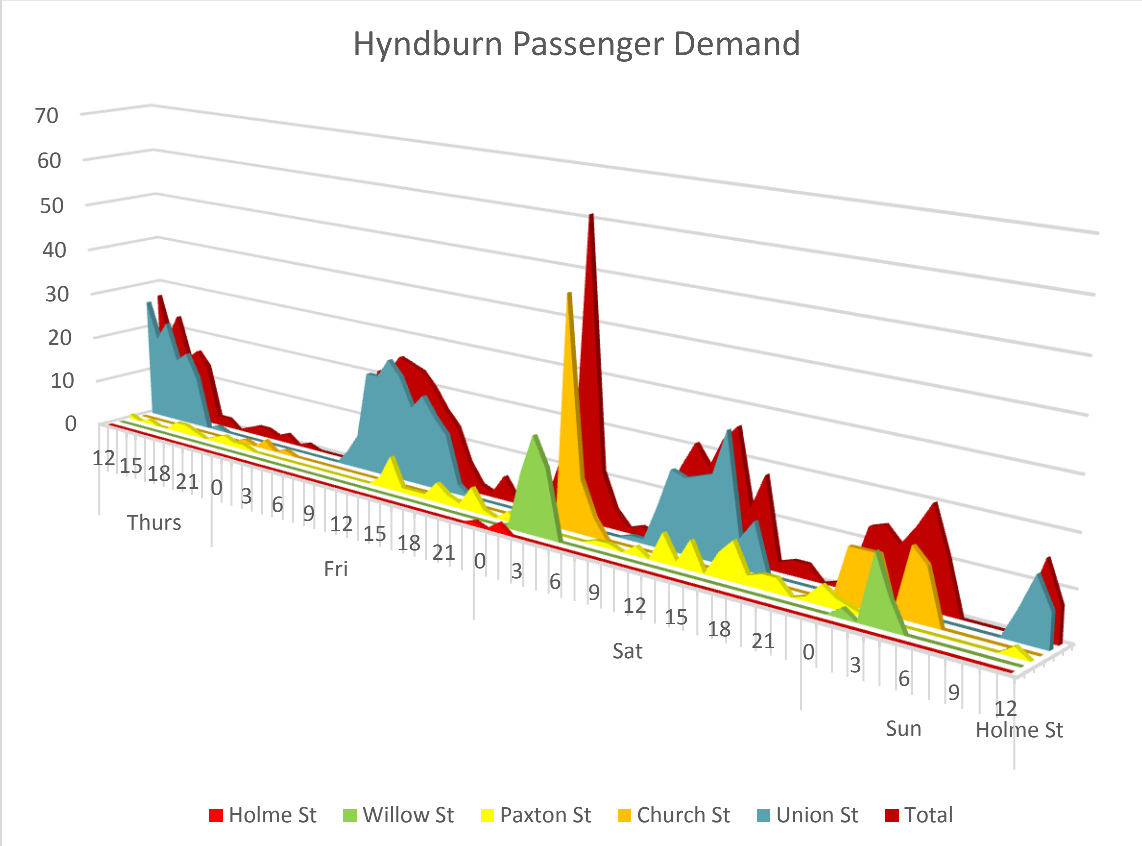
Overall rank usage in 2018

Our observations of rank usage covered each of the known active ranks as well as outline observation of some of the other ranks to ensure we fully understood how hackney carriages service Accrington. Our observations were then factored to provide estimates of weekly typical rank usage in the Hyndburn Borough area as shown in the Table below (and compared to results from 2012 for validation purposes).

Rank	**2018**		**2012**	
	Passengers	**Proportion**	**Passengers**	**Proportion**
Union Street	849	69.8%	569	32%
Church Street	165	13.6%	Not there	
Paxton Street	131	10.7%	108	6%
Willow Street	69	5.7%	177	10%
Holme Street	3	0.2%	917	50%
Blackburn Road	Out of use		34	2%
TOTAL	1,217		1,805	
Decline since 2012	-33%			

It should be noted that we are aware that the night club serviced by Willow Street rank closed permanently since the surveys were undertaken, which would imply a further reduction in observable hackney carriage usage. Further, all of the observations at Paxton Street, and many of those at Church Street, were actually undertaken effectively as private hire bookings given the proximity of the two booking offices to these locations, albeit some being by hackney carriage vehicles from the nearby rank. Further discussion of this occurs within the separate rank descriptions.

Before considering the results rank by rank, a graph was produced of the actual observations by rank by day, shown below:



The graph is based on full observations at each of the ranks so gives a full and true picture of variation over the three days covered by the survey. It shows that daytime demand is dominated by Union Street rank. There is no real night demand other than on Friday and Saturday nights, with the peak being the early hours of Saturday morning, with a very high one-hour total shown based on flows at the far end of Church Street. The early hours of Sunday morning saw more constant flows at Church Street over several hours, but a lower flow from Willow Street. The Paxton Street rank was well-used from Friday lunch time onwards, but used more on the Saturday. Further detailed discussion follows.

Compared to 2012, flows are down by around a third. However, usage of the main daytime rank at Union Street has shown growth of nearly 50% compared to the 2012 level. Further, there appears to be 21% growth at the Paxton Street site. The major reduction is the switch of use from Holme Street to Church Street and Willow Street, where there has been a very significant overall reduction, related to changes in the night economy. As already noted, this will have worsened more since the closure of the club allied to Willow Street rank.

Peak flows
The early Saturday morning peak – in the hour ending at 04:59 – of some 61 passengers, was a very marked peak over twice the level of the next highest total flow in any hour across all ranks. This implies that the ISUD evaluation should utilised the 'peaky flow' factor.

Unmet demand
All the data collected was sorted by the average passenger waiting time in any hour at any location. There was just one hour where average passenger delay was over a minute – and this was just for one passenger at 03:00 in the early hours of Friday morning. There were just five further instances when the average passenger delay ranged from 3 to 24 seconds in any hour, all of which occurred at Union Street, all but one of which occurred in the hours beginning either 13:00 or 14:00 on each of the days of the survey. The highest amount of delay in these five instances was at 13:00 on the Friday when four people experienced a wait, but of no more than 2.5 minutes. The maximum passenger wait for any passenger observed was just under five minutes.

This suggests that, though there is unmet demand, it is at a very low level and further discussion of this occurs in the section where the significance of this observed unmet demand is discussed further.

Overall hackney carriage operations in Hyndburn
The main hackney carriage activity in Hyndburn is that in Accrington, and is that related to the main shopping centre and its rank in Union Street. However, even there demand is low and sees no more than 15-26 passenger departures per hour for no more than seven hours in any day, and possibly less on some days (such as Sundays and Saturday afternoons). When using the typical occupancy of around 1.25 people per journey, this results in a maximum number of vehicle trips per hour of 21 related to Union Street. Based on a relatively high return to rank time of 30 minutes, this provides work for no more than a total of 11 hackney carriages, quite a lot less than the current total allowed.

The situation related to the other daytime and night ranks is complicated further. Daytime demand at Church Street and Paxton Street are both very low. However, both these ranks are located directly outside private hire offices. Observation at both locations suggested the current operations are effectively private hire, just happening to occasionally utilise hackney carriages. During all daytime hours, and many night hours with lower demand, any hackney carriages operating from these locations are parked

with drivers proceeding to leave the vehicles unattended while they wait in the booking office.
Passengers seemed to be used to this and rarely if ever sought to take a hackney carriage from either rank. Only at Church Street – and then often only from the area on the opposite side of the road to the part time rank – did people tend to approach or hail hackney carriages and then only when several vehicles were waiting in the early hours. In many cases we observed passengers pass a hackney carriage on the ranks to enter the office, and then be escorted to a waiting private hire vehicle nearby but not on the rank.

The operation at Church Street saw different areas of the rank used at different times, with the largest demand actually met as stated above on the opposite side of the road at the furthest end of Church Street, not from the rank itself.

From our site visit, it was clear that the ranks at Peel Street and Blackburn Road were very unlikely to see any hackney carriage usage, nor that they could be potential locations for unmet demand, so they were omitted from any further consideration. The Peel Street rank is close to the alternative exit to the shopping centre, but this exit sees much less footfall than the main exit near to the rank. Blackburn Road was under road works during our survey period, and is just now being re-appointed, although the potential demand sources near it are currently unlikely to produce significant levels of hackney carriage trade.

Observation was made of the single space in the Accrington Station car park, but it was principally used as a pick-up point by booked private hire vehicles. We are not aware of any extra permit or charge being required to use, but there is also no apparent hackney carriage usage here either.

Further consideration of these issues follows in the synthesis section when other evidence from alternative survey sources has been considered.

Wheel chair usage and other usage of ranks
During the course of our survey period at the ranks, two people were observed using a wheel chair to access a hackney carriage, and a further 20 people were seen to have other visible disabilities. All of these observations were at the Union Street rank.

Considering vehicle types, 18% of the hackney carriages observed across the rank survey were wheel chair accessible style, a slightly higher percentage than that suggested in the overall fleet. The bulk of these were in fact concentrated on the Union Street rank, where the percentage rose to 21% of the vehicles observed.

In terms of total vehicle types observed at or near ranks, 73% were local hackney carriages. 16% were local private hire vehicles. 10% were private cars and just 1% were goods vehicles. These figures exclude information for the Paxton Street rank where although the rank was almost exclusively only used by hackney carriages, most bookings left using private hire parked near to the rank. Despite Union Street being a clear dedicated rank, there was high abuse of it by cars, although private hire mainly picked up in an area just ahead of the rank.

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, 150 interviews were undertaken in the Accrington central area and a further 50 in Great Harwood, the only two locations that would easily substantiate collection of information from the public in a cost effective manner. A larger sample of 393 had been collected in 2012.

Across the full sample, 65% said they had used a licensed vehicle in the Hyndburn area in the last three months, slightly lower than the 70% from 2012. However, the value for Accrington itself was 70% with that for Great Harwood much lower at 48%.

When combined with frequency of use information, it was estimated that those interviewed in Accrington tended to make around four licensed vehicle journeys per person per month, compared to 1.4 for Great Harwood (and 3.3 overall). When compared to similar figures but for hackney carriages only, the level falls to 0.4 trips per month in Accrington and 0.2 in Great Harwood (where there are few if any hackney carriages active as such), giving a hackney carriage usage percentage of 11% for Accrington.

In terms of how people normally obtained licensed vehicles, overall 45% said they phoned a company, 28% said rank, 18% used an app, 4% used a freephone and 3% hailed. The rank level is much higher than in 2012 (8%) whilst the hailing is marginally higher (2%). The rank percentage for Accrington was higher at 29%, although the value for Great Harwood suggests many respondents were those who travelled back from Accrington as there are no ranks in Great Harwood. The proportion using an app was the most similar across both areas.

55% of people told us what companies they used. Of this number, 7% provide three names and a further 40% provided two. This suggests a fair satisfaction with companies and some competition, although there is also clear dominance by these two companies. The largest company is much more dominant in Accrington than in Great Harwood. Though two 'apps' were quoted, the main one was that provided by the largest company.

In terms of hackney carriage usage, a very high 72% overall (slightly higher in Great Harwood) could not remember their last usage of a hackney carriage, whilst the level who could not remember seeing a hackney carriage was very low, an encouraging level of recognition. This suggests the current ways of distinguishing hackney carriages in the area are appropriate and working for the public.

Eight different rank locations were cited by people. The main rank people were aware of was Church Street, with 56% of responses overall, and a fairly equal view between the two areas. Three general locations were given which might be considered to be Union Street, otherwise the citation of Union Street, at 4%, was very low, and interestingly all from the Great Harwood sample. The next highest quoted rank in both areas was 'station' but it was not clear if this was the Paxton Street rank or the main car park location.

Overall, 37% said they used the rank they cited, 63% said they did not. All of those saying Broadway (which could be a term for Union Street) said they did not use it. Those saying Eagle Street could mean the new station rank. Overall, this suggests poor knowledge of ranks, and little overall use of them, despite the relatively high proportion saying they did use ranks earlier. This could relate to the regular usage of hackney carriages on private hire circuits, and the usage of booking offices near to ranks.

This view of ranks is reinforced by there being five suggestions about new ranks, all from people in Accrington, none of which gained more than a single quote each, despite all saying they would use the new rank suggested. Two of these were supermarket locations, and one was the Bus Station, all sensible suggestions but very unlikely to see significant use in context.

13 different company names or descriptions were provided. As might be expected, one company was dominant in Great Harwood and another in Accrington, with the top two companies taking 72% of all mentions by people. Three companies took between five and seven % of mentions, although all of these were mainly in Great Harwood.

26% of respondents provided a scoring of eight aspects of their most recent taxi trip. Those in the Accrington interviews tended to score between average and very good, whilst those in the Great Harwood interviews were all either average or good. None scored any aspect any less than average. Driver professionalism and more so driver area knowledge were the two aspects most tending towards being seen as being very good. Price was the aspect found to be most average.

26% also said if they were satisfied with the service they received in their last trip, in terms of time to arrive and journey time. All were satisfied.

Of the responses regarding items that might increase peoples' use of hackney carriages the overwhelming one was if fares were cheaper. This was similar to the response in 2012. The next largest item was if more hackney carriages could be phoned for.

89% across the area did not, nor did they know anyone who did need an adapted vehicle. For those needing an adapted vehicle, almost all said they, or those they knew, would need a wheel chair accessible vehicle.

The latent demand questions found just three people overall who had given up waiting for a hackney carriage at a rank. However, only one of these related to a rank. The hailing value saw two people, both in Union Street. This provides rank latent demand values of 1.005 and hailing of 1.01, and a combined latent demand factor of 1.0075. This is much lower than the value of 1.0636 from 2012.

95% of those responding felt there were enough wheel chair accessible hackney carriages in Hyndburn.

With regards to feeling safe in hackney carriages, 98% felt safe before 6pm and 93% after 6 pm. This question was answered by nearly all respondents. Of the very small number saying they did not feel safe, an even smaller number (three for each category) told us what would make them feel safer. A third said female drivers, a third safer drivers and the final third having a travelling companion.

89% said they had no preference with reference to choosing use of an electric powered vehicle. Of those saying they would choose such a vehicle, all said they would only do so if it did not cost any more.

57% had regular access to a car whilst 90% of respondents lived in the Hyndburn area.

In terms of comparison of the sample collected to the census values, there were more females interviewed than in the census statistics (69% interviewed, 51% in census). The level of people aged 31-55 matched the census exactly with less of the younger group (15% compared to 22% in census), and correspondingly more of the older group. These two factors combined might tend to give a result more favourable to usage of licensed vehicles, but only marginally so.

5 Key stakeholder consultation

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

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

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

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

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

Where the statistical analyses in Chapter 2 demonstrate low levels of wheelchair accessible vehicle (WAV) provision, an increased emphasis will be given to the issue in terms of the focus of stakeholders but also in specific efforts to contact disabled users and their representatives. However, it must be remembered that none of our consultation is statutory and for cost effective and fixed budget reasons we limit our attempts to contact people generally to a first attempt and reminder.

Supermarkets

Three supermarkets across the area told us their customers do use licensed vehicles. One advised us they had a freephone to a company whilst the other two said that customers wanting licensed vehicles would make their own arrangements to obtain them.

Two were not aware of any ranks, whilst the third advised us people would phone one private hire company. Two had not had any reports of issues with the service, whilst the one with the freephone said it had been advised of poor service by licensed vehicles, focussing on rudeness from those servicing their customers. Three other supermarkets or shopping centres made no comment.

Hotels

Very few hotels were identified in the Hyndburn area. One of those identified told us their customers did use licensed vehicles, and that reception would make arrangements for any customer who asked for a vehicle. They also made use of one private hire company, and had not had any issues with the service provided. The other hotel made no comment.

Public houses

Two pubs said their customers did use licensed vehicles. Both said customers would either call for a vehicle themselves, or staff would contact a company for them. Both quoted the same company when asked about places people might go, rather than quoting ranks. Neither had heard any negative feedback about the service provided. Five other locations made no comment whilst another could not be contacted.

Night clubs

Attempt was made to contact four night clubs. Two had closed down and one was not contactable. The other venue which was contactable refused to make any comment about licensed vehicle services.

Other entertainment venues

Three entertainment venues were contacted. All said their customers did use licensed vehicles. Two said customers would make their own arrangements for obtaining a vehicle, whilst another said that customers might usually make their own arrangements, but that they would also contact if asked by a customer. All would use the same private hire company, and again there had been no issues reported regarding the service provided. One venue refused to make any comment and another did not provide any feedback during the time available.

Restaurants

Two restaurants and cafes responded to advise us that their customers did make use of licensed vehicles. Either people would make their own arrangements, or staff would if customers asked them. One mainly used a private hire company, whilst the other was unaware of ranks or places people might go. Neither had any issues reported about the service provided. Two others provided no comment, whilst one proved impossible to find a correct phone number for. A further four establishments refused to make any contribution to comment.

Hospitals

A local hospital had no comment about licensed vehicle services.

Police

No comment was provided by the police.

Disability

No comment was made by any disability groups or contacts.

Other key stakeholders

A contact responsible for ranks was identified at Lancashire County Council, after some difficulty where responsibility was pointed back at Hyndburn licensing. Their comments have been added into the rank chapter. In essence, there is an allowance for Hyndburn to specify limited period ranks particularly night ranks where there is an existing parking regulation in the daytime. More significant changes have to be negotiated with the County authority. As already confirmed, the County believe that Hyndburn have regularly used their allowance regarding night ranks to good effect (presumably in regard to the Voodoo Club rank).

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.

Our agreed questionnaire was issued by email by the Council, together with printed copies made available on the taxi counter and to booking offices. The response was possible either by returning paper copies at the expense of those returning them, or by use of the on-line form. Of the approximately 600 potential respondents, 19 replied (just over 3%), a low but fair level of response.

Of those responding, 79% said they drove hackney carriages, with the remainder being private hire drivers. The hackney carriage drivers provided an average length of service of 15 years compared to the 11 years from those responding on the private hire side. Hackney driver service length ranged from three to thirty years, whilst that for private hire was five to 17 years.

Considering the quoted days worked, for the full sample, 53% said they worked six days, with 5% saying seven days. 26% said five days and 11% four days, with one saying they only worked on one day. The average calculated for days worked was actually just over five days.

The average total hours worked was 39, with a maximum of 55 quoted, relatively low. Although the number of private hire respondents was low, the averages suggest slightly less hours worked for private hire than for hackney carriage, a typical result given the tendency for private hire drivers seeing less waiting time for jobs given the telephone demand profile.

A range of reasons were given for drivers working the shifts that they did work. However, none were dominant, with just one factor gaining more than one person stating it, that being avoiding heavy traffic or rush hours.

All said they owned and drove their own vehicles. However, there were a small proportion, 17% who said that someone else drove their vehicle as well.

42% overall accepted pre-bookings. This covered all the private hire respondents who answered plus several hackney carriages. From all respondents, 50% said they obtained most fares from phone bookings, which included four hackney carriages. There were 38% who said their main way of getting fares was from ranks, plus one person saying school contracts and another saying ‘other’ but not confirming what.

One private hire driver obtained 60% of fares from schools contracts, another was principally an airport journey operator. Another did not confirm how they obtained fares with the final private hire getting all his work from office bookings.

The hackney carriages that advised us of their main way of bookings were equally split between mainly getting fares from phone bookings and from the rank, although only half those getting most work from ranks said that 99-100% of work came from that source. For those mainly getting work from the phone, 20-40% was actually from ranks and 2-10% from hailing. Many quoted hailing as providing a small but not zero contribution. This confirms that very few of the hackney carriage fleet actually focus on ranks.

In terms of ranks used, three named only Union Street. Three did not name any rank. Three named Union Street and Church Street whilst one named Union Street and Peel Street. Two named Union Street, Church Street and Willow Street, two Union Street, Church Street and Paxton Street, and one Union Street, Church Street and Peel Street. When all mentions were totalled, of all mentions, 46% were Union Street, 31% Church Street with 8% each for Paxton Street, Willow Street and Peel Street.

Of those responding, 89% said the limit policy remained appropriate. This was just two respondents who disagreed, one hackney carriage and one private hire (this being someone who focussed on contract work). In terms of reaction to removal or increase of the limit a high level of 68% said they would leave the trade – including the person who disagreed with the limit! One said they would get a hackney plate and work the ranks whilst none suggested working longer hours, the usual reaction provided.

Only a very small number provided reasons they thought the limit benefitted the public, with most saying it ensured cars were always available at ranks, and another saying it reduced congestion and pollution that would otherwise ensue.

83% said they felt there were enough hackney carriages licensed. The only dissenters to this view were one private hire and two hackney carriages.

Some comments were made, two saying there were too many taxis in the area, one pointing out the lack of trade in the area due to closure of many shops, pubs and clubs, one saying there was not enough work to justify more plates, one asking for more space at Union Street, and the final person saying more hackney carriage plates were needed (but not giving any further reason why).

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.

From the on-street surveys, the pure rank-based latent demand value is 1.005. The hailing latent demand value was 1.01, providing a combined latent demand factor of 1.0075.

The table below provides the values of the components of the ISUD index for this survey, and for completeness, those from the 2012 survey:

ISUD component	2018 values	2012 values	Comment
Average passenger delay	0.033	0.12	Reduced
% Off peak hours with any delay	11.11	0	Increased
% Passengers travelling in hours with average delay a minute or more	0.142	0.38	Reduced
Seasonality	1	1	Same
Peakiness	0.5	1	Changed
Latent demand	1.0075	1.0636	Reduced
ISUD value	0.026	Zero	Increased

The overall value of the index has become non-zero in the current survey. However, comparing each element of the index, all have in fact changed in a positive manner (reducing the significance of the observed unmet demand) apart from the factor measuring the level of off peak hours that show delay. This value has increased from zero to 11%. This has resulted from the increase in patronage identified at the main Union Street rank, where some off peak delays have now occurred.

All other indices, average passenger delay, the numbers travelling in hours when there is over a minute average passenger delay, the peakiness factor and latent demand have all moved in positive directions towards suggesting reduced significance of the observed unmet demand. Further, the instances of average passenger delay over a minute are actually in just a single hour, and for a small number of passengers.

The cut-off for the index where unmet demand should be considered significant is 80 – with the value of almost zero being a very long way from that point.

The ISUD index therefore guides a conclusion that there is no unmet demand in the Hyndburn licensing area, either patent (measurable) or latent (the measurable element of this), that is significant at this point in time. This conclusion has to be taken forward to the overall evaluation, but is a strong guide that it will be very unlikely that other evidence will change the overall study conclusion to being one that there is any unmet demand that could be counted significant in terms of Section 16 of the 1985 Transport Act. Further discussion of the implications of this follow in the synthesis section below.

8 Summary, synthesis and study conclusions

This Hackney carriage unmet demand survey on behalf of Hyndburn Borough 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, synthesis and conclusions for the Study.

Background and context

This survey was carried out between June and September 2018 on behalf of the Hyndburn Borough Council licensing department. Hyndburn is the licensing authority for hackney carriage and private hire, but most transport policy is undertaken at the Lancashire County Council level. However, there is an agreement in place that allows some appointment of ranks by the Borough in a limited range of situations. This was last used to effect with the now-closed Voodoo club and rank provision for this site.

With regards to the licensed vehicle trade in the area, hackney carriage vehicle numbers have been limited for some while, with no extra plates added. However, recently several plates have not been renewed meaning that the survey was undertaken when no more than 60 plates were potentially active. This failure to renew licences is mirrored by a recent reversal of the trend of growing private hire vehicle numbers, which is also shown in a marginal reduction in overall driver numbers in the latest statistics available, and a drop in operator numbers.

The level of wheel chair accessible vehicles (WAV) has recently remained stable at some 15% of the fleet. Some introduction of similar vehicles in the private hire element of the trade occurred around 2014, but these vehicles did not remain long and the principal provision of WAV remains in the hackney carriage part of the trade.

Recent developments have seen a refreshing of the local taxi licensing policy document (adopted in 2017). This reaffirms that the last nine plates must be replaced with WAV style, whilst the first 53 plates retain ability to be saloon style.

Rank observations

Rank surveys were informed by pre-tender on-line reviews, evidence from the previous survey, and a walk-round on the day of the inception meeting,

together with information from licensing enforcement officers about known usage. Recent methodological developments meant that a wide range of the available ranks were observed to provide comfort that the Survey would be fully aware of how the ranks in Accrington worked. There are no provisions for hackney carriages other than in central Accrington.
The results of the surveys found that nearly 70% of present demand for hackney carriages at ranks was focussed at the Union Street rank, which services the main shopping centre in Accrington. The principal night life for the area was also serviced by a rank which provided nearly 6% of hackney carriage demand, although this also saw some private hire bookings servicing the location. Since our survey, this night club has closed, which will have further reduced overall demand for hackney carriages in the area.

The main night rank actually used has changed since the last survey in 2012 but even without the club closure night demand has reduced. However, the level of peakiness of night demand has increased to provide a high spike for one hour in the early hours of Saturday morning during our survey work. The Church Street rank saw about 14% of overall weekly estimated demand. However, this location had a very complex operation, with some departures from an area not actually the rank but nearby it, and a mix of private hire and hackney carriage operation arising from a private hire office located adjacent to this rank.

The only other rank to see significant usage is Paxton Street, which in the current situation is effectively a private hire booking office that happens to have a rank outside, but is often serviced by the hackney carriage fleet that works for that operator. All observed customers walked past parked hackney carriages to enter the office before being escorted to the next available vehicle – which might have been either a hackney carriage or a private hire, dependent on arrival times.

Since 2012, overall hackney carriage demand at ranks appears to have fallen by about a third. This is complicated by the fact that demand at Union Street appears to have increased by about half, with demand at Paxton Street up 20% (but only on the assumption all demand observed should in fact be hackney carriage). The key drop has been in night demand, which will have worsened with the recent main club closure.

Night demand focusses on the early hours of Saturday and Sunday mornings, with very little at any other time. Daytime demand is almost exclusively at Union Street apart from minor amounts at Paxton Street.

In terms of service to customers, only one hour in the full survey saw an average passenger wait time of over a minute, and this was only for one passenger in the early hours of Friday morning, quite unusual. However, the increased demand at Union Street appeared to provide small elements of unmet demand mainly towards lunch time on each day at this location. However, this only accounted for five hours of all those reviewed.
In overall terms, the main daytime rank could operate with no more than 11 vehicles without leading to any unmet demand. If Paxton Street was purely hackney carriage operated, it might need up to four vehicles to meet demand over an extended period. This will be further discussed in the synthesis section.

Two people were seen accessing hackney carriages in wheel chairs at the Union Street rank, a very encouraging level given the overall low levels of demand. Further, 20 others were well served for their apparent disabilities. Further, the survey found a higher level of usage of WAV at 18% than the proportion of 15% in the overall fleet. At Union Street the proportion serving was even higher at 21%, something that is best practice and needs to be valued highly.

Ranks were generally well observed and little abused, although there were a high level of private hire active at or around the active ranks, though mainly keeping away from the actual rank area. A larger concern was the regular habit of parking hackney carriages on ranks with drivers waiting in their respective nearby private hire offices. This was an issue at both Paxton Street and Church Street. This seemed to be normal practice as all customers ignored the vehicles and entered the offices.

On street public views

Recent usage of licensed vehicles at 65% was only marginally reduced from the level in 2012. The level of estimated monthly trips by licensed vehicle was relatively high for Accrington (4 per person per month), but lower in Great Harwood. Hackney carriage usage was about 11% of this. However, 28% said they used ranks to obtain licensed vehicles, a higher level than in 2012, and the hailing level had also increased a little. A key change was that 18% of people now said they used one of two apps, with one dominating use.

Private hire saw two dominant companies, but also other competition whilst there was a reasonable level of satisfaction shown by 53% of people only naming one company. Great Harwood had its local company reducing the impact of the largest company in that location, whereas it was almost totally dominant in Accrington.

However, nearly everyone was aware of hackney carriages, the issue being that 72% could not remember the last time they used one. Differentiation is therefore very good in the area.

Rank usage and knowledge was generally poor, with the main rank known about being Church Street. Comparing this with the level people said they used ranks perhaps confirms that people think booking offices are the same as ranks.
For all aspects of usage of hackney carriages there was between average and very good ratings provided. Driver professionalism and particularly driver knowledge were counted as very good. Price was the aspect found to be most average – despite the fact that at September 2018 Accrington's fares were 347th= out of the 370 British fare levels, and at 4-70 for an average two miles well less than the average of 5-83. Not surprisingly lower fares were the main item that people said might encourage them to use hackney carriages or use them more.

Most people did not need, nor know anyone that needed a wheel chair accessible vehicle. All those needing such a vehicle said it would be a fully wheel chair accessible style. 95% felt there were enough such vehicles in the area.

Latent demand was very low, at 1.005 for ranks, 1.01 for hailing giving a combined latent demand factor based on giving up waiting of 1.0075, much lower than in 2012.

People also felt generally safe in hackney carriages, with only a small reduction in the high values for night travel. They were generally indifferent to use of electric vehicles, and unwilling to pay any more to use them.

Key stakeholder views

Attempting to obtain key stakeholder views confirmed the difficult economic conditions, with many attempted calls thwarted by closures. Most key stakeholders and their customers used private hire bookings with very little knowledge of ranks. No major issues were raised apart from a few comments about poor service from drivers.

Trade views

The all-trade questionnaire gained a 3% response, low but fair for this type of survey. 79% were hackney carriage drivers. The average working week was five days and 39 hours, quite modest, with a maximum of 55 hours quoted, which is very low. Most were owner-drivers but some vehicles were used by others at times. 42% accepted pre-bookings with just 38% saying their main fare source was ranks. The hackney carriages that advised us of their main way of obtaining bookings were evenly split between the main way being phone and rank, although only half those saying ranks gave most fares said they got 99-100% of fares from the rank.

Ranks used saw three naming only Union Street. Church Street, Willow Street and Paxton Street were all named by some drivers. There were two mentioning Paxton Street and 12 Union Street overall.
89% supported retention of the limit, with one opposer from the hackney carriage trade and one from the private hire (although their main work was contracts). Comment was made suggesting there were too many taxis and too little trade at present.

Synthesis
It is interesting to note that the estimate of the number of hackney carriages needed to service observed demand at Union Street is around 11 vehicles. From our driver survey, albeit with a low response rate, 12 hackney carriages said they serviced this rank, a very similar number although there must be more who do service this location but did not reply to the driver survey.

Further, our observations at Paxton Street observed no more than four different hackney carriages servicing this location. The driver survey identified two drivers who claimed to service this rank, both of whom obtained 60-75% of their work from a booking office and 20-30% from ranks. Both also claimed to service Union Street and Church Street.

Given the above, a key question arising is what are all the hackney carriages actually doing? It is clear that many work for private hire operators and rarely if ever service ranks. Further, even those that service ranks often do so only as part of the company that is near the rank, with very few hackney carriages remaining attended on ranks other than at Union Street or late at night in Church Street and Willow Street.

Overall demand for licensed vehicles, yet alone hackney carriages in the area is low. However, demand has increased at the main daytime rank, Union Street, and it sees excellent levels of usage by those with disabilities and those in wheel chairs. This is unusual and requires being valued.

There is clearly a significant issue related to booking offices and ranks, and how people get licensed vehicles other than at Union Street in the day and in Church Street later at night. In the end this boils down to if the booking offices near ranks should be closed, or the ranks taken away from these locations? The low level of demand suggests that it would be very unlikely that hackney carriages would ever find enough demand simply sitting at these ranks, but the current practice has clearly devalued the public view of what a hackney carriage is – apart from at Union Street.

Formal evaluation of significance of unmet demand

In essence, the ISUD value, even though marginally higher than the zero of last time, is effectively zero compared to the cut-off value of 80 that would indicate observed unmet demand was significant. In fact, the level of unmet demand is practically zero. This is despite the fact that two plates of the limited level of 62 are no longer active.

The only element of the index that has increased since 2012 is related to off peak delay, which in this case appears to relate to the impact of growth in patronage at the Union Street rank.

Conclusions

There is very distinctively no unmet demand at this point in time in the Hyndburn Borough Council area that could be counted as significant in any way, either patent or latent.

This conclusion has been drawn on the basis of a fleet of 60 vehicles being available, rather than the limit of 62. Further, outline estimates of pure hackney carriage demand in the area suggest current daytime pure hackney carriage demand could be met by 11 vehicles, possibly rising to a maximum of 15 if booking office based demand at ranks was switched back to hackney carriage.

Night demand – which is likely to have fallen further – accounts for no more than 30% of demand and so could probably be met by at most 10 vehicles even allowing for the high one hour peak to continue occurring.

A key question is what around half the current hackney carriage fleet are actually doing.

9 Recommendations

On the basis of the evidence gathered in this Hackney carriage unmet demand survey for Hyndburn Borough Council, 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 Hyndburn Borough Council licensing area.

The committee therefore has the possibility of being able to retain the current limit and defend this decision if necessary.

Further, given that the estimate saw just 60 plates active, the Committee can also agree that the limit of 62 be reduced to 60 without any concern.

A case could also be made that any further hackney carriage licences not renewed could also be extinguished, which might encourage compliance, and may encourage those choosing to remain in the industry by giving them marginally increased trade opportunities.

Appendix 1 – Industry statistics

Hyndburn

Dft Stats suggest limit began in 1998

	hcv	phv	lv total	hcd	phd	dd	total d		Operators	% hcv WAV	% phv WAV
1994D	60			96				**1994D**			
1997D	56	170	226	75	220		295	**1997D**		7	
1999D	60	150	210	80	190		270	**1999D**	18	8	
2001D	62	210	272	84	248		332	**2001D**	21	13	
2004D	62	268	330	62	233	97	392	**2004D**	36	11	
2005D	62	268	330	62	233	97	392	**2005D**	36	13	
2007D	62	268	330	62	233	97	392	**2007D**	36	13	
2009D	62	324	386	41	305	97	443	**2009D**	18	19	
2010N	62	333	395	*41*	*326*	*99*	*466*	**2010N**	*27*	15	
2011D	62	344	406	41	346	101	488	**2011D**	35	18	1
2012N	62	344	406	*39*	*366*	*96*	501	**2012C**	*29*	14	
2013D	62	355	417	37	386	91	514	**2013D**	23	16	0.8
2014N	62	372	434	*33*	*392*	*103*	527	**2014N**	*21*	6	*4*
2015D	61	399	460	28	397	115	540	**2015D**	19	15	0.8
2017D	62	418	480	21	416	165	602	**2017D**	28	15	0.5
2018C	59	419	478	16	408	175	599	**2018C**	26	15	

Note – yellow cells amended values from DfT, DfT believe to be in error
Underlined, italic values are estimates based on average of years before and after.

LVSA

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Appendix 2 – Timetable of rank observations

Please see separate document

Appendix 3 – Detailed rank observation results

Please see separate document

Appendix 4 – Detailed on street interview results

Please see separate document

Appendix 5 List of Stakeholders consulted

Key consultee	Response
Supermarkets	
Arndale Shopping Centre, Accrington	N
Asda, Hyndburn Road	Y
Aldi, Argyle St	N
Lidl, Hyndburn Road	N
Mc Colls, Union Road	Y
The Food Warehouse by Iceland	Y
Hotels	
Sparth Hotel, Clayton-le-Moors	N
Mercure Blackburn Dunkenhalgh Hotel, Clayton-le-Moors	Y
Restaurants / Cafes	
Francos Ristorante Pizzeria, Oswaldtwistle	N
Monte Cristo, Accrington	R
Th'Old Stables, Accrington	Y
Balti Stan, Clayton-le-Moors	Y
Oriental Delight, Clayton-le-Moors	R
Imposta, Accrington	U
Broadwalk Café, Accrington	N
Menga, Great Harwood	R
Entertainment	
Vue Cinema	R
Space Centre	N
Halo Kids Dance and Fitness	Y
Accrington Stanley Football Club	Y
Hyndburn Leisure Centre	Y
Public Houses	
Duckworth Inn, Oswaldtwistle	N
Park Inn, Accrington	Y
Dog and Otter, Great Harwood	N
Plough, Great Harwood	N
Black Dog, Oswaldtwistle	N
Forts Arms, Clayton-le-Moors	N
Albion, Clayton-le-Moors	N
Brickworks, Accrington	Y
Night Clubs	
Voodoo Lounge	Gone
Platinum Nightclub	Gone
The Attic	U
Ibar	R

Other key stakeholder groups	
Accrington Victoria Community Hospital	N
Highway, Lancashire	Y

Key : Y – comment obtained
R – refused to provide comment
N – no response received
U – no contact possible