City of Bradford Council

Unmet Demand Survey for hackney carriages

August 2018

Executive Summary

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

This Report summarises the full body of evidence gathered between March and July 2018. It is the latest in a regular series of reviews of the level of significance of observed unmet demand required as the Council has limited hackney carriage vehicle numbers since at least 1978, with no more than two additional vehicles added during that period. Recent growth in licensed vehicles has seen strong growth in private hire and overall driver numbers, though private hire operator numbers have remained stable.

Using a slightly enhanced level of rank observations, weekly passenger usage is estimated at 19,748, higher than in 2014 but similar to the level of 2011, suggesting decline and resurgence in the rank based market over a six year period, albeit not showing any real growth therefore in six years. This may be a result of the conclusion of Bradford central area building projects, but there are other major changes within the area hidden within this overall pattern.

Since the last survey there has been significant loss of night demand and an increased focus on daytime demand. Bank Street has therefore become the busiest passenger location, followed by the private Interchange rank. Current service finds waiting for a vehicle to arrive at a rank a very rare experience, with average passenger delay over the full survey just six seconds. Only 2% of passengers experienced any delay, and only 4% of all the rank hours saw an average passenger delay in any hour over a minute.

There are a wide range of ranks actively serviced across the entire City area, but overall demand is low. There was only one single hour in the whole of the survey that saw over 100 passengers leaving that rank in an hour, with average passenger flow across the whole area being just 55 passengers per hour.

The surveys show that the trade has moved with changes in the area, particularly marked by the good growth for the new Kirkgate rank, seeing 2% of the overall market since its fairly recent opening.

The public told us their level of usage of licensed vehicles has increased, but there are just 0.4 trips per person per month using hackney carriages compared to 3.4 for all licensed vehicles, i.e., including private hire. The livery means hackney carriages are highly visible, but 60% of people could not remember the last time they used them, even though quoted rank usage is increased from 2014. The level of respondents using an app is 7%, quite a large value given the only recent introduction of these options.

Whilst people told us they were aware of ranks, and used them, there was little clear knowledge of what to call a particular location rank. People told us they would complain if they had an issue, but few reported any issues. As is usual, the main item that would increase hackney carriage usage was lower fares, although 30% did say they would use more hackney carriages if they were available to phone for. Latent demand was low at 1.0285 to 1.034 and much lower than in 2014. A corresponding 96% said they felt there were enough hackney carriages in the City.

Key stakeholders mainly reported good service from private hire, although some were aware of ranks, and no negative views were presented.

Trade representatives provided useful input to the study, mainly concerned about the reduced level of demand for hackney carriages arising from reduced economic activity. Other points were made not directly related to the demand survey.

The index of significance of unmet demand for this survey is higher than in 2014, but remaining far from significant, at between 4.85 and 6.23. Fairly rarely for a private rank, the Interchange rank performance with less vehicles able to service it, has a positive impact on the index, providing the lower of the two values above.

The change in demand has made hackney carriages more dependent on contract work, which has impacted on the off-peak service levels and the ISUD level.

The conclusion of there being no unmet demand which is significant provides the Committee the option of retaining the limit, and at its present level, and evidence able to support this decision if required.

Although not in the gift of the licensing committee or department, focus on improved signing and marketing of ranks and a review of accessibility of these particularly to those in wheel chairs would have significant merit overall.

Contents

1 General introduction and background

The City of Bradford 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 fleet, whilst some go as far as also allowing rear-loading conversions. Given the additional price of these vehicles, this often implies a restriction on entry to the hackney carriage trade.

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

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 Unmet Demand survey for hackney carriages for City of Bradford are:

- appointed Licensed Vehicle Surveys and Assessment (LVSA) on 23 January 2018
- in accordance with our proposal of November, 2017
- as confirmed during the inception meeting for the survey held on 1st March 2018
- this survey was carried out between 1st March 2018 and July 2018
- On street pedestrian survey work occurred in March 2108
- the video rank observations occurred in March and April 2018
- Licensed vehicle driver opinions and operating practices were identified by discussion with key trade stakeholders during the course of the survey
- Key stakeholders were consulted throughout the period of the survey
- A draft of this Final Report was reviewed by the client during August 2018
- and reported to the appropriate Council committee in Autumn 2018.

City of Bradford is a metropolitan borough authority. The authority has a current population of 539,100 using the 2018 estimates currently available from the 2011 census.

In terms of background council policy, the City of Bradford is a unitary authority although it is currently working closely within the West Yorkshire Combined Authority (WYCA). the Local Transport Plan (LTP) for the area is the West Yorkshire LTP, adopted on 1st April 2011 and valid up to 2026, and known as 'My Journey West Yorkshire'. The LTP is supported by the daughter document 'Leeds Local Implementation Plan' last dated 2011 to 2014. Work is currently under way on the West Yorkshire Combined Authority (WYCA) Transport Strategy which will be a 20-year vision updating the LTP (2016 to 2036). This has been through consultation and the current summary document is the 'Transport Strategy Transport Committee Report' of 24th February 2017. The accompanying Leeds City Region Metro Study was completed during 2016 and considered by the Transport Committee of Leeds City on 21st April 2017.

The Strategy document identified that 1% of travel to work in West Yorkshire is by taxi, the same level as by bicycle or motorcycle, and a quarter of the level undertaken by train (4%). Policy RN5 seeks 'to work with the taxi trade to improve taxi facilities and environmental performance. Hackney carriages and private hire vehicles are a valuable part of our transport system, providing more choice for whole or part journeys.

Taxis also provide a valuable service for those people with a disability or mobility impairment. We want to enhance this offer'. 'We will provide enhanced taxi ranks at appropriate key transport hubs, work with the taxi trades to strengthen safeguarding protection for vulnerable users, to achieve a greater take up of low emission electric taxis, working with the Governments Ultra Low Emission Vehicle programme and accelerating the provision of recharging facilities at transport hubs, car parks and on the highway network'.

A further policy including licensed vehicles is SF2 'deliver mobility as a service for an enhanced customer experience. This would provide a mobility account enabling people to use licensed vehicles as part of their mode mix where appropriate'.

The Transport Strategy consultation included various questionnaires, including one of what mode of transport people used, and how often. 1,596 people responded. Of these, 1471 answered the question about frequency of use of taxis. None said they used taxis four or more days per week, 78% said they used them three or less days and 22% said they never used them. This compared to 20% not driving cars, 11% never using buses and 11% never using cars as a passenger. 9% said they had a particular interest in taxis.

People were also asked if they supported specific policies. 54% said they would support policy RN5, improvement of taxi facilities and their environmental impact, although this was amongst the lowest support for any of the proposed policies.

The present vision is the 'LCR Metro' a way by which connectivity will be provided between the principal towns, cities and transport hubs across the City Region. It is not a mode of transport or a brand. It focusses on quality, frequent, reliable, resilient, integrated transport from all modes. However, its focus is on higher capacity transport and as such currently ignores licensed vehicles (and many other modes such as cycling and walking).

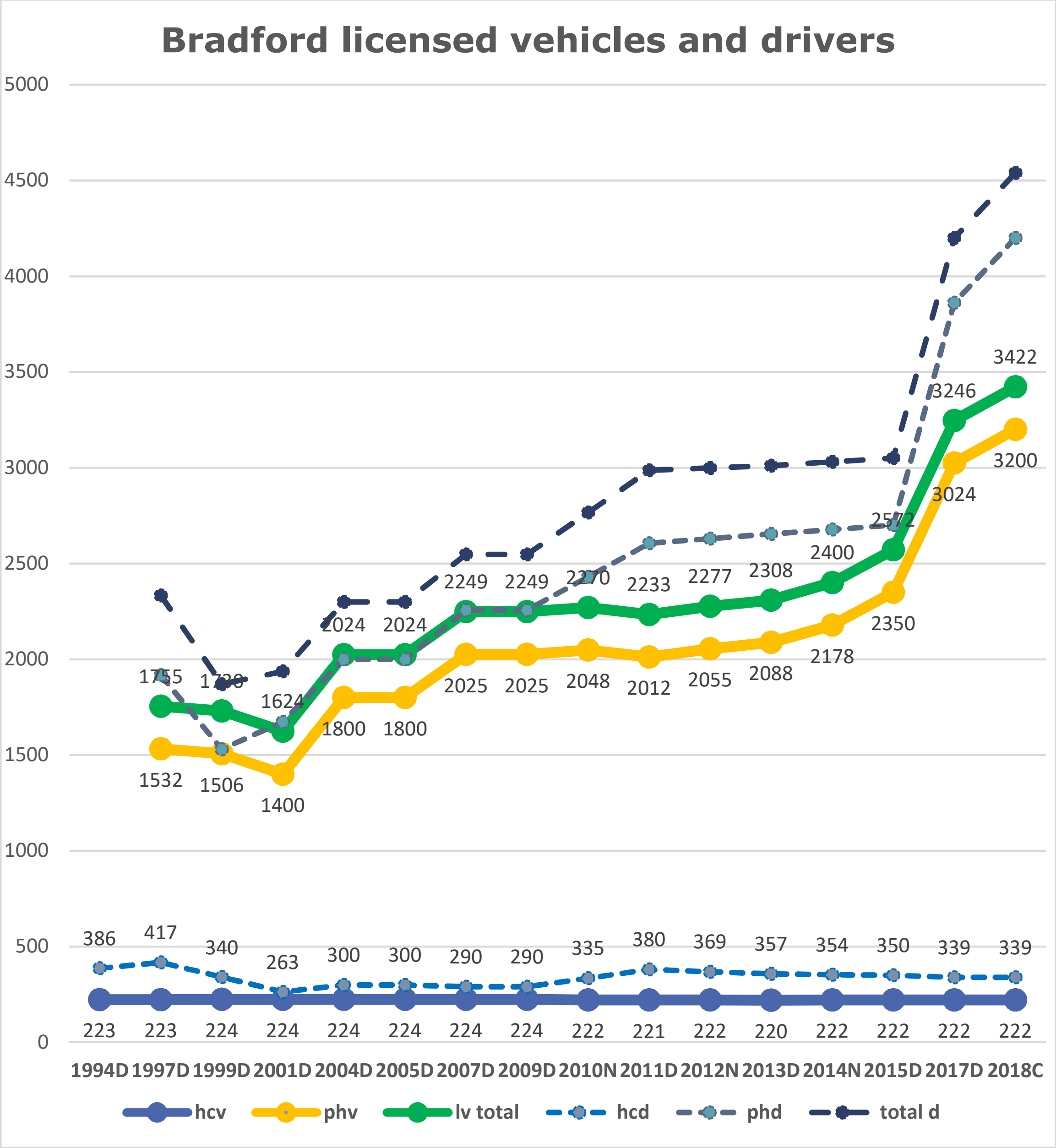
The nature of the authority means that rank provision is under the jurisdiction of the Council, albeit within the highways section rather than directly within licensing. This should provide better links between licensing needs and provision of the infrastructure in terms of ranks and other highway related needs for licensed vehicles.

However, all licensing authorities have full powers over licensing the vehicles, drivers and operators serving people within their area. The City of Bradford has chosen to utilize its power to limit hackney carriage vehicle numbers, and as far as we are aware has done so since 1978, with no more than two plates added in more recent years.

Further, a recent change has been ensuring all hackney carriages were wheel chair accessible, although the range of vehicles allowed is quite wide compared to other areas (although similar to many other West Yorkshire authorities). In essence, the bulk of the WAV style vehicles chosen have focussed on the smaller style vehicles, coincidentally also a significant part of the Halifax central zone hackney carriage fleet.

There has been a recent peer review of taxi licensing policies and procedures undertaken by Leeds City Council for Bradford licensing. This reported in Autumn 2017 and has been widely circulated amongst the trade and led to an Action Plan which is moving forward and has been clearly appreciated by the trade. However, the focus of this Report is testing for unmet demand, an element not part of the peer review, although some impacts from that review may feed into operating practices that might impact on the levels of service provided in a positive way.

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

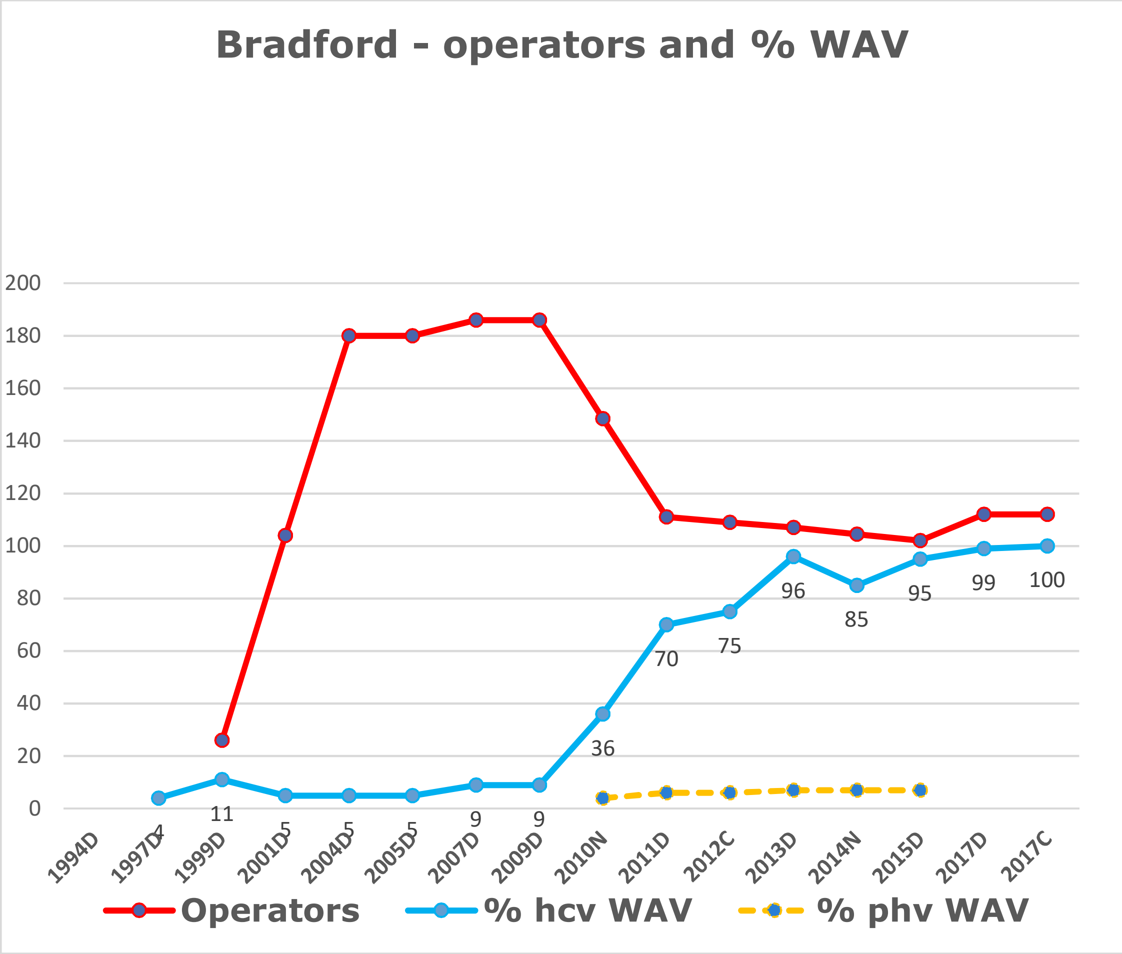
The graph shows constant numbers for hackney carriage vehicles and drivers over a long period, although there was some increase in drivers around the time of the last survey, and the level is still higher now suggesting quite a potential for some double-shifting of hackney carriage vehicles.

Since the last survey, private hire vehicle and driver numbers have both significantly increased although it is not clear if there are specific reasons for this. Even excluding any out-of-town vehicles, this suggests much stronger competition against hackney carriages in the area over the last three years.

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.

For Bradford, the still fairly recent change to a fully wheel chair accessible hackney carriage fleet dominates the graph. There are, however, some WAV style vehicles provided in the private hire element of the trade, although numbers are not large and may principally relate to those operators preferring to have their own provision rather than having to make arrangements with the hackney carriage trade to meet phoned for demand seeking adapted vehicles.

The number of private hire operators has recently remained fairly stable after a period when there were a lot more, again there is no clear reason to explain this.



Operator numbers and levels of WAV provision in the fleet

City of Bradford undertakes regular review of its policy to limit hackney carriage vehicle numbers in line with the BPG. The previous surveys were reported in 2014 and 2011, although most survey work in both cases was undertaken in the previous years to the report date.

3 Patent demand measurement (rank surveys)

As already recorded in Chapter 2, control of provision of on-street ranks in City of Bradford is directly under the control of the authority, albeit by the highways section of the Council. Overarching transport policy is also under the council aegis but shared with the West Yorkshire Combined Authorities.

Appendix 2 provides a list of ranks in City of Bradford at the time of this current survey. Our methodology involves a current review both in advance of submitting our proposal to undertake this Unmet Demand survey 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). The detailed specification of the hours included in the sample is provided in Appendix 3.

There has been relatively little change in rank provision since the last survey, although a key change has been reduction in use of several ranks related to closure of night venues that provided their custom. This has been particularly severe in the area around Great Horton Road and Morley Street, where several clubs and a major public house have all closed. However, one establishment on Great Horton Road has seen growth, with the impact of changing the rank used at this location to the one nearest to this venue.

The Broadway shopping centre has also been developed significantly since the last survey. It has two ranks introduced to service demand, one of which (on Lower Kirkgate) was observed to be in reasonable usage in our streetview review before appointment. Further site reviews were undertaken of central Bradford ranks during the course of our study.

Overall survey results

The observations from the rank surveys were analysed and overall estimated weekly levels of demand estimated for each of the ranks. To validate the information and understand current levels against those from the past, information from the two previous surveys have also been drawn together and compared. The overall results are shown in the Table below with detailed hourly results from the rank surveys in Appendix 4.

Rank	**2018**			**2014**			**2011**		
(Bradford unless stated)	Est pass	order	%	Est pass	order	%	Est pass	order	%
Bank Street	4088	1	21	1436	4	10	1801	5	9
Bradford Interchange, private	4047	2	20	2551	1	18	3363	2	17
Brook St, Ilkley	3168	3	16	531	11	4	922	8	5
Westgate	1789	4	9	1213	6	9	3137	3	16
Bingley, Wellington St	1511	5	8	2018	2	14	3650	1	18
Rawson Square	1271	6	6	815	8	6	1053	7	5
Forster Square Station	1248	7	6	1315	5	9	1884	4	9
Norfolk Gardens	957	8	5	1451	3	10	1333	6	7
Kirkgate, Shipley	504	15	3	404	12	3	504	11	3
Cooke St, Keighley	400	9	2	293	13	2	754	10	4
Lower Kirkgate	366	10	2	Not existent					
Great Horton Rd, Wetherspoons	Pub and clubs closed			738	9	5	496	12	2
Great Horton St, Lahore	282	11	1						
Morley Street	109	12	1	554	10	4	810	9	4
Hall Ings	7	13	0.						
Chester St, former Revolution	2	14	0.	909	7	6			
High St, K2 Club, Keighley	0	16	0	9	14	0.			
Northgate, Baildon	0	17	0						
Chapel Walk, Bingley							198	13	1
Drake Street	Closed, roadworks						84	14	0.
Sackville Street							36	15	0.
Godwin Street							0	16	
Total estimate weekly	19748			14237			20025		
From previous survey	+39%			-29%					
From 2011	-1%								

The table suggests that in 2018 there were some 19,748 passengers picked up from hackney carriage ranks across the full licensing area of the City. This is 1% less than the level observed in 2011, but 39% more than the level observed in 2014, suggesting some element of return to levels seen at that time.

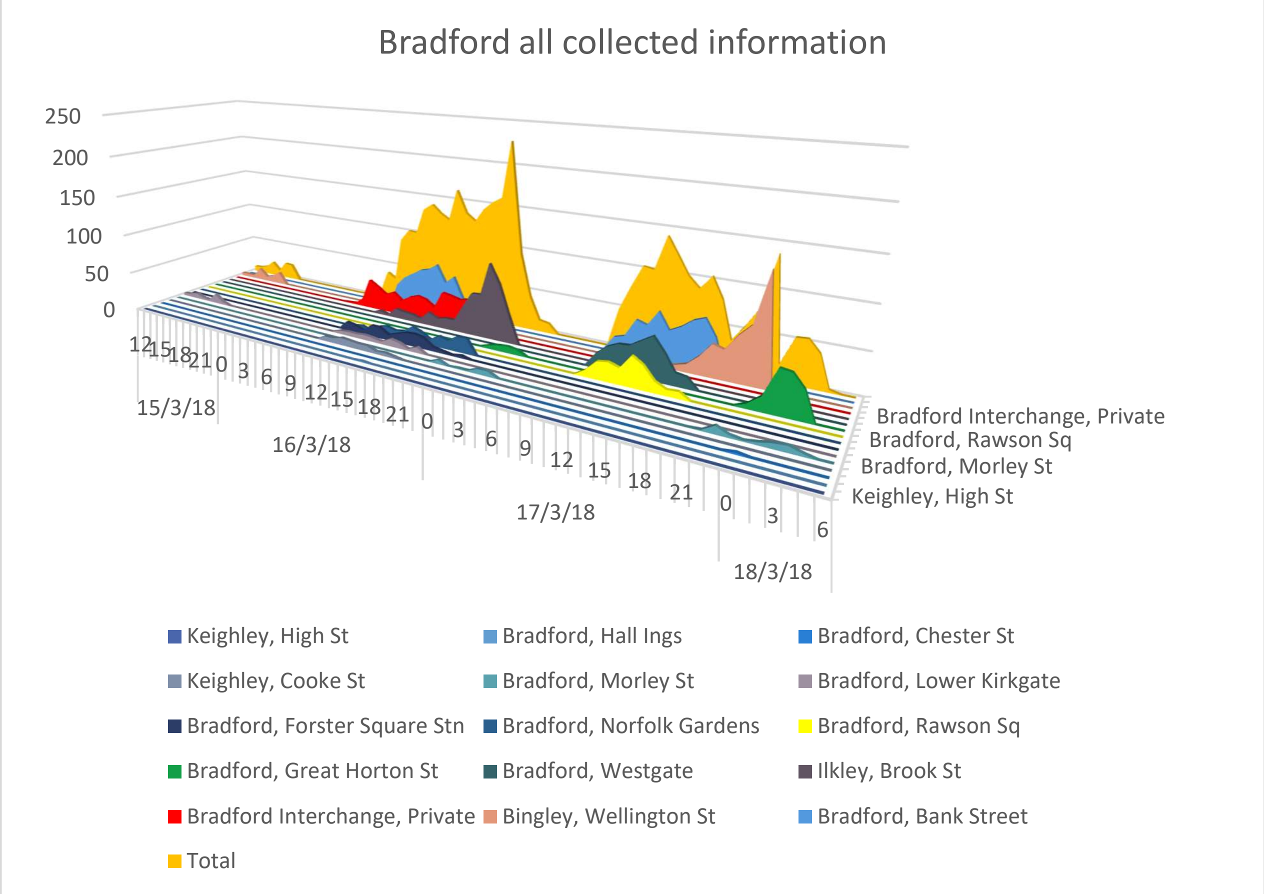
Unlike many other surveyed areas, there has been a significant amount of change in the order of importance of locations, which may be a result of the development in the City, much of which was under way during the last survey and is mainly completed now. Bradford Interchange has been consistently in the top two locations in all surveys.

Bank Street was fifth in 2011, fourth in 2014 and is the busiest passenger location now. This may partly be due to the full opening of the new central shopping area, which also tends to see more activity over longer periods than was the case before. Some of the restaurant provision of the City has also moved to this location.

The remaining picture is very changeable. Brook Street, Ilkley has increased whilst Wellington Street, Bingley has reduced. Kirkgate, Shipley, has remained remarkably consistent in overall usage levels. The impact of club closures around Great Horton Street and Morley Street is also evident, with over 2,200 passengers between them in 2014 now reduced to less than 400 in 2018. The new Lower Kirkgate rank has provided 2% of the 2018 flow, further evidence of the positive impact of this shopping area on the City.

Contribution of individual ranks over time

The graph below shows each set of information collected, only for the days when each site was collected. It provides an outline view of the contribution of particular sites, but is not a comprehensive picture as it only shows the sample of sites, not an estimate of all sites on every day.



The graph shows there are a lot of sites that all contribute together to the overall usage, with about half the sites providing larger contributions to the totals. There are no real all-day all-night sites, with the Interchange having the longest spread of usage. Several sites are principally used during shopping hours, whilst there are others that only service night trade.

It is also clear that there is very little overnight usage of hackney carriages from ranks – with hardly any usage at all on Thursday evenings, and most on Saturday evenings, but not to the extent that the overall demand pattern could be called peaky at all. Some of the largest demand spikes tend to be in the suburban areas, particularly at Wellington Street, Bingley and at Brook Street, Ilkley.

Incidence of passenger delay

From all the information gathered, totalling some 235 hours of rank operational data, there were just nine hours (4%) when there was average passenger delay of a minute or more, with only one hour having a value over five minutes. There were 17 hours (7% of hours) with delay up to but less than a minute. This suggests very good overall service. Just 2% of all observed passengers had any wait at all, with only six having waits of 11 minutes or more, just eight with waits between six and ten minutes and 69 between one and five minutes.

This is summarised in the overall average passenger delay for observed hours being just six seconds, which is minimal.

In terms of locations, the longest average delay was in the 15:00 hour at Brook Street, Ilkley. Two of the over a minute values were at Bank Street (19:00 and 20:00 on the Saturday night), with most, four hours, at Lower Kirkgate – tending to be over the lunchtime period on the Friday.

Other information regarding rank demand

For all the observed hours, the average hourly flow at all sites in total was 55 passengers, with a maximum of 227 in the 23:00 hour on the Friday evening. Across individual sites, there was only one instance of over 100 passengers in an hour, which was at Wellington Street, Bingley at 23:00 on the Saturday night. The average hourly flow over all sites is just 15 passengers in any hour at any site. Many hours see no passengers at all, even at the busiest sites.

Summary

Hackney carriages are active at a wide range of ranks across the full licensing area, but overall flows are not high and there are many hours with very little if any demand for hackney carriages at ranks. Demand is well met by the current fleet and the level of waiting by passengers at ranks is very low. What peaks that do occur are well met by the available vehicles.

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. For the Bradford sample, we interviewed less males than the census suggested, less under 30’s and correspondingly more 31-55’s. However, the variation should not bias the sample unnecessarily.

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.

A total of 351 people were interviewed across the area, with 101 in central Bradford and 50 in each of Shipley, Keighley, Bingley, Ilkley and Baildon. With active ranks in all but Baildon, this should provide a good set of views from those in the area. Detailed results are in Appendix 5.

Of those interviewed, 67% said they had used a licensed vehicle in the last three months in the area, marginally higher than the 63% that said that in the previous survey. Most people told us how often they used licensed vehicles, providing an estimate of 3.4 trips per person per month. This varied from 1.6 in central Bradford and 1.8 in Ilkley to a high of 6.1 in Bingley, with the central area value for Bradford being the lowest. However, when the question was asked about hackney carriage usage, as is normal the overall value was much lower, 0.4 (or 12% of the total), but the Bradford value was the highest (0.7, giving a 44% of total licensed vehicle usage by hackney carriages there). This suggest higher usage of private hire in the suburban areas.

In terms of visibility, the hackney carriage fleet was well known, with just 5% of those responding to the question saying they could not remember seeing a hackney carriage in the Bradford area, with most of these being in Bingley and Keighley, with no-one in Bradford, Shipley or Ilkley giving this response. However, a higher 60% of people said they could not remember when they last used a hackney carriage, a matter of choice.

Over all those who responded, 59% said they got a taxi by telephone, followed by 28% saying they got one at a rank, again higher than the value given in the last survey (23%). A relatively high 7% said they used an app. Just one percent said they hailed, much less than the value from before, possibly an impact of people who would hail using app-based services. Freephone use was relatively low at 4%.

When asked about companies they phoned for licensed vehicles, there were 57 different names given, some of which may be colloquial or different names for some companies. 18 of these were just one person naming that company.

However, the top seven companies named accounted for 49% of all mentions made, accounting for between five and 11 % for each company. This suggests no dominant company across the area. It also suggests a very high level of competition between the private hire segment of the market.

43 different names were provided regarding locations of ranks in the area. Some were outside of the Bradford area, e.g. Leeds station, whilst others were similar or colloquial names for the same rank, e.g. Bradford Station, Bradford Interchange. Ranks were named both within the central area of Bradford and in the outer areas. Many people mentioned multiple suggestions, with a total of 377 different mentions provided. Of these, there was an equal split between people saying they used the location and that they did not.

55% of the mentions were for eight locations that each obtained 5% of more of the total mentions given. The most frequent rank obtained 20%, although this was equally split between people saying 'Bradford Interchange' and those saying 'Bradford Station' (assumed not to be Forster Square, which was separately named in 2% of mentions). The next largest mention, but mainly by people from Keighley, was 'Keighley station', with 8%. This is most likely the private hire office at this location as there is no formal rank here. Bradford Town Hall was next with 7% - which would be Norfolk Gardens which also received three direct mentions. Bank Street obtained 6%, Shipley Station 5% (mainly by Shipley respondents) (not quite clear what this could be), Bingley Station 5% (which would be Wellington Street), and 'Bradford Market' 5%.

This suggests a good usage and knowledge of where ranks are, although it is also clear that good and ready marketing of the main rank locations could be helpful to potential customers. However, most key ranks are obvious by having vehicles there when customers are nearby, so the main focus would be signposting from places distant from ranks to the nearest location. Examples in City control might be from outside the new shopping centre to the Kirkgate rank, or from various central locations towards the Bank Street rank, although many other ranks need signposting from within the private locations which they serve (e.g. within the two stations and within the shopping centres).

There were 17 different locations suggested for new ranks, but none obtained more than a handful of mentions each (maximum of three mentions). This suggests the presentation of where current ranks are more clearly, perhaps on a leaflet and also on the City web, might be more effective than considering other new locations at this time.

People were asked if they had problems with the hackney carriage service in the Bradford area. There were a total of 21 responses provided by 16 people, not significant. Bingley had the highest number of complainants and responses, with six people giving eight responses.

The principal response, with 38% of all responses, was driver communication, followed by 24% saying driver knowledge of area. There were no issues with vehicle cleanliness or conditions quoted.

A high number responded to the question if they had a problem, would they complain. A resounding 98% said they would, with 42% saying they would complain to the Council licensing, 35% to the driver and 22% to the company named on the vehicle.

As is usual for these surveys, a much higher proportion were willing to tell us matters that might encourage them to use hackney carriages, or use them more often. Some 199 responses were obtained, many being multiple responses by one person. Of the total responses, the top reason was cheaper fares (45%), followed by more hackney carriages that people could phone for (30%). Preference for more hackney carriages at a rank came third, but with just 13% of responses. Better drivers and vehicles both obtained just 5% of responses each.

90% of those responding said they did not need, nor know any one who needed a wheel chair or other adapted vehicle. Of those needing, or knowing someone that needed a vehicle, 70% favoured other adaptations, not WAV and 30% suggested WAV, although the numbers were not overall high (just 32 responses).

The latent demand factor, identified by asking if people had ever given up waiting for a hackney carriage at a rank in the City, obtained 11 people saying they had. Most responses were from Bradford and were legitimate hackney carriage rank locations, although one was 'Baildon station', which is not a rank. Hence the actual latent demand value, assuming all other respondents had never given up waiting for a hackney carriage, is 2.85%, or a factor of 1.0285, much lower than the 13% quoted in the previous survey. This mirrors the very low queue levels observed in the rank survey.

Two people had given up when trying to hail, both in central Bradford, if these are added to the rank latent demand value, the index rises to 1.034, still significantly reduced from the previous quoted level. To corroborate this, 96% of those responding said they felt there were enough hackney carriages in the City of Bradford.

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. Appendix 6 lists those consulted.

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

Six supermarkets told us their customers used local licensed vehicles. All said they had freephones, but one also said their customers would often make contact with a company themselves. None were aware of any ranks that customers might use.

Three had no issues, whilst two gave positive comments about the service received. One said the company used was very friendly and reliable whilst another told us one company took very good care of vulnerable customers, particularly with two who were suffering with dementia. Two other supermarkets did not respond despite several attempts to contact them. One supermarket did raise an issue with licensed vehicles sometimes being a nuisance in their car park.

Hotels

Seven hotels replied to advise us their customers did use local licensed vehicles. Three said reception would call a vehicle if people asked, whilst four said although reception or staff would call, often people made their own arrangements. All those responding about where people could get taxis actually named private hire companies rather than rank locations. Three had no issues whilst four took time to praise the service provided by the companies they phoned.

Public houses

Three pubs responded and advised us their customers did use local licensed vehicles. All said people tended to make their own arrangements although one would contact companies if customers asked. One suggested there was a rank in the centre of the town they were in, whilst another named a central rank also in the location they were. Another named a company. Four did not provide any comment in the time available. Two of those responding took time to say the vehicles always arrived promptly with the other saying the service provided was cheap and reliable.

Night clubs

One night club did not prove possible to contact as it no longer existed. One club refused to provide any response whilst the remaining five made no comment during the course of our consultation period.

Other entertainment venues

One site contacted had closed down, and none of the other four locations made any comment within the time available.

Restaurants

Two restaurants and cafes responded but advised us their customers did not use licensed vehicles at all. One refused to provide any response whilst five others did not reply within the time available.

Hospitals

One hospital contacted provided no comment about the service.

Police

The police made no comment regarding the service.

Disability

One disability group contacted refused to provide comment whilst no comment was received from any other groups contacted.

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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 study, trade consultation was through the active trade representatives. All were provided opportunity to contact us, with the following inputs provided:

One representative felt there were enough hackney carriages, so much so that there was often over-ranking, particularly in off-peak periods. They felt that price competition was strong from private hire companies, and would prefer regulation of both hackney carriage and private hire fares.

Another told us there were several locations where parked private vehicles prevented hackney carriages using ranks when they needed to. In general there are low levels of rank work. The most important rank is at the Interchange, but it carries a supplementary fee of £100 per driver per week, felt to be high. This is paid to the local passenger transport executive, Metro. Of the drivers, just 25 choose to do this, which may restrain the ability of the trade to service this location.

A visit to this rank identified drivers concerned that many private hire were able to pick up closer to the station exit than their rank allowed.

Bank Street is the main council rank, and is usually full, but fed by spaces in Nelson Street and Lower Kirkgate when necessary, using cb radio contact. There is a similar link between Sackville Street and the Westgate rank.

There are many examples of demand generators closing since the last survey. A key one is the original Morrison’s, with many other stores around it also closing down, leading to the disuse of the rank there.

At night, Sackville Street is not accessible and passengers from the clubs there tend to be picked up along both main roads nearby.

Shipley has a large daytime rank for eight or nine vehicles, but nothing suitable to service night trade.

Bingley can be very busy at night, but present times see very little night activity in central Bradford itself compared to previous years. The Bingley rank would benefit from being located closer to the main night demand, but currently sees up to 30 vehicles waiting in a nearby car park to feed the main rank.

Keighley tends to close down after 20:00 with very little demand there after that time on any night.

Ilkley has an active rank, which is frequented by people needing wheel chair vehicles, but its location is felt to be awkward for such people to use safely. This arises from the large amount of immovable street furniture near to the rank, compounded by the slight hill nature and also by the fact that feeding of vehicles occurs from round the corner. This rank is also distant from the railway station, where there is little pick-up space available for customers.

The representative concluded by advising us that a lot of hackney carriage drivers were highly dependent on school contract work to guarantee income.

One driver told us they were concerned that many passengers preferred the saloon provision within the private hire part of the industry and often avoided using their WAV style vehicles for difficulty of access to them.

Another told us they thought the survey had concluded more vehicles were needed, but that they disagreed. They suggested vehicles used to change hands for around £55k but that this value was now down to around £20k. They also confirmed the fee required at the Interchange. They also were concerned that disability training encouraged them never to load wheel chair passengers on hills, but that ranks in both Ilkley and Bradford were located on hills and on this basis should not be used for wheel chair loading.

Another driver raised their concern that they felt we could not undertake a study properly because we were not locally based. They also voiced concern that there was little demand for wheel chair accessible vehicles, and that many with disabilities could not in any event get into the local style of wheel chair accessible vehicle. They pointed out that the Leeds fleet remained mixed vehicle style. They also made the same point regarding ranks on hills where they according to training should not load wheel chairs – although they did suggest they had to refuse some wheel chair jobs in Ilkley for this reason.

No other inputs were provided, with the private hire trade having no comment.

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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.

ISUD values

The values from the ISUD calculations from the current survey, and for that undertaken in 2014 are provided below, including (brackets) values where the private station rank at the Interchange is excluded from the considerations, given that if there is any unmet demand there, the Council cannot directly increase the number of vehicles available as they are subject to the additional charge which drivers can choose to pay or not.

ISUD component	2018	2014
Average passenger delay (mins)	0.1 (0.12)	0.1
Off peak queues	19.05 (21.05)	4
Overall delay proportion	2.46	0.24
Peakiness factor	1	1
Seasonality	1	1
Latent demand factor	1.034 (1.031)	1.128
Overall ISUD factor	4.85 (6.23)	0.1
ISUD is value of 80 or more		

The table shows overall average passenger delay is very low, just 0.1 minutes, and interestingly exactly the same as the value estimated in 2014.

The proportion of off peak hours when there were any passenger queues at all is 19.05%, which is relatively high. However, this often occurs when off peak demand at ranks is relatively low and hackney carriages choose to work from private hire circuits and also choose not to wait at quieter ranks, reducing service to them. This is quite an increase since the 2014 value.

The overall proportion of passengers travelling in hours when there is average passenger delay a minute or more has also increased albeit to a fairly small level of 2.46%, compared to the almost negligible value of 0.24 estimated in 2014.

Neither peakiness nor seasonality factors have varied since 2014, with the surveys both undertaken in a time of typical demand, and with no change to the lack of a ‘peaky’ profile to demand in the area.

However, latent demand has reduced from 1.128 in 2014 to 1.034 now, a reasonable improvement and suggesting at periods of peak demand there appear to be more vehicles available, reducing peoples’ temptation to walk away.

The overall estimated ISUD value, based on all ranks in the City and the sample undertaken, is 4.85. Whilst this is increased since 2014, this value is still a very long way short of the industry standard cut-off value of 80 which is taken to signify that the observed unmet demand is significant.

It must be stated that the calculation undertaken included the private Interchange rank observations, and is also dependent on the actual sample undertaken.

Even if the Interchange performance is taken out of the equation, the values only rise marginally to 6.23 (which suggests that the performance of the rank at that location is better than average, which is unusual for a further restricted rank). Interestingly, by taking out that location, the level of latent demand is reduced, but the off peak performance worsens given that no passenger ever experienced any wait at that point.

In summary, the area does have unmet demand. Its scope and level has increased since the 2014 survey, but, at this point in time, the industry standard evaluation tool suggests the level of this is far from being significant. Further, our test has been a robust one and

This conclusion has to be taken in context of the other evidence gathered and will be discussed further in the synthesis section of the report below.

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8 Summary, synthesis and study conclusions

This Unmet Demand survey for hackney carriages on behalf of City of Bradford 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 each of the previous chapters, draws the key facts together and then provides conclusions regarding the study. Recommendations follow in a separate Chapter. It has been written in late July 2018 under the various requirements and background as at that point in time.

Background and context

This report summarises the body of evidence gathered between March and July 2018, following our proposal of November 2017. The City of Bradford is a unitary authority working within the West Yorkshire Combined Authority (WYCA). WYCA supports development of the licensed vehicle fleet, but focusses on providing an enhanced customer experience for those with reduced mobility, and improving the air quality impact of the overall fleet.

The City has recently reviewed background overall policies and conditions via a peer review by nearby Leeds City Council. The policy of limiting vehicle numbers for hackney carriages has been in places since at least 1978, with no more than two plates added in recent years.

Whilst hackney carriage vehicle numbers have remained about the same, there have been increases in driver numbers, although these have been reducing over the last few years. Since the last survey, there has been strong growth in both private hire vehicle and driver numbers, suggesting increased potential competition from that sector of the market with the hackney carriages.

Operator numbers remain relatively stable, with some recent increase.

This review is one of a regular set of reviews, with the last undertaken in 2014 and 2011, with a generally three-yearly cycle adhered to following the BPG.

Rank observations

A marginally enhanced level of rank observations were undertaken for this survey. Results suggest an estimated 19,748 passengers in a typical week from ranks across the full City area. This level is higher than that from the previous survey, but very similar to the level observed in the 2011 survey.

Despite little change to rank provision, apart from adding one new rank which is active linked to the new central shopping centre, there has been a significant amount of change in the importance of different ranks across the area.

However, the Bradford Interchange, private, rank remains within the top two providing the most custom. In this survey, Bank Street is now the busiest passenger location. Many locations have reduced significantly as the club provision has changed and generally reduced in central Bradford.

The area continues to see a lot of ranks in use contributing to the overall demand. The focus of demand now is much more to daytime, with very little rank usage on weekday nights, and not a great amount more at weekends either. Peaks are related to active clubs and locations, and are very susceptible to the fortunes of the venues they relate to.

There were just 4% of observed rank hours with average passenger delay over a minute, and only 2% of all passengers experienced any wait at all. Overall average passenger delay reflects this, at just six seconds. The conclusion therefore is that people get a good service, and rarely would experience waiting for a vehicle at a rank. Despite the large number of ranks and good number of vehicles, there was only one hour at one site that had over 100 passengers in an hour, with the average observed flow per hour per rank being very low at just 15; with the overall average passenger flow across the surveyed hours being just a total of 55 passengers per hour.

The rank work confirms that demand is well met by the current fleet, which also has an ability to meet any peak demands that occur very effectively. There is also evidence that the trade has moved with changes in the area, particularly with the new rank in Kirkgate gaining some 2% of all estimated passengers during its relatively short period of development.

On street public views

Area-wide on street interviews found a slightly increased quoted level of recent usage of licensed vehicles at 67%. An estimated 3.4 total licensed vehicle trips are made per person per month, falling to just 0.4 trips per person per month by hackney carriage. The information confirms higher usage of hackney carriage in central Bradford and higher use of private hire in the other centres.

The hackney carriage fleet remains highly visible to respondents, although some 60% suggested they could not remember when they last used a hackney carriage. Quoted rank usage at 28% was higher than the last survey, but the biggest increase has been 7% who say they get licensed vehicles by using an app.

There was no evidence for any dominant private hire or phoned-for licensed vehicle company in the area, suggesting competition remains high.

People were aware of a lot of ranks, and about half of those mentioning ranks said they did use the ones they had named. A concern was lack of clear knowledge of what to call ranks, with many colloquial names being used. There was little call for new rank locations.

Few people had issues with the hackney carriage service, strengthened by the fact that nearly everyone said they would complain if they had an issue. 42% would complain to the licensing section, 35% to the driver and 22% to a company named on the vehicle.

The top reason, as usual, that would encourage more use of hackney carriages was if they were cheaper (45% of responses), with 30% saying if they could phone for hackney carriages. Having more hackney carriages at a rank was the third reason, but only scored 13% of all mentions.

The formal latent demand factor of between 1.0285 and 1.034 is low, and much lower that estimated in the previous survey. This was corroborated by 96% of those responding saying they felt there were enough hackney carriages in the City of Bradford area.

Key stakeholder views

Most key stakeholders whose customers used licensed vehicles suggested they used private hire provision. Only some locations, mainly pubs, were aware of ranks. There were quite a number of positive affirmations of the good level of service provided (albeit probably by private hire companies). There were no significant negative views put forward.

Trade views

A number of hackney carriage trade representatives provided useful input to the survey. Most were concerned about reducing levels of usage of their vehicles by customers. The impact of change in the economy was also made clear to us. Many had become dependent on school contracts for guaranteeing their income.

Some other concerns were raised not directly related to the demand survey, mainly concerns about rank locations and their accessibility to those in wheel chairs, given the hilly nature of many of the centres.

Formal evaluation of significance of unmet demand

The overall level of average passenger delay remains low, at just 0.1 minutes, and the same as in the previous survey. Latent demand levels have also reduced, but the other two key performance indicators have increased, giving a higher (but still far from significant) ISUD index of between 4.85 and 6.23.

Unusually, the private rank at Interchange actually has a positive impact on the ISUD indicator, suggesting that location gets a very good service compared to other places despite the additional restriction on numbers able to service that location.

Synthesis

Hackney carriages remain generally available across the full area of the City, capably servicing a wide range of ranks. They are able to meet various peak demands readily, and have reacted positively to new opportunities in terms of rank activity. The livery continues to ensure people are very aware of their existence, although as in most places, usage often comes down to people choosing on perceived price.

Current demand focusses mainly on daytime usage, with suggestion that contracts are becoming more important to individual livelihoods. It is possible that this has led to some of the few passenger waits observed when people want hackney carriages at ranks at times many are servicing such contracts. However, the overall impact is far from significant.

The hackney carriage trade of Bradford remains one which is worth being highly valued, and one that clearly contributes to transport across the area in a positive manner.

Conclusion

Drawing on all the evidence within this report, there is **no evidence of any unmet demand which could be counted significant in terms of Section 16 of the 1985 Transport Act.**

9 Recommendations

The conclusion that there is no evidence of any unmet demand being significant provides the Council the option of retaining its current limit policy, and keeping the level of vehicles at the present level.

There is merit in improving signing and marketing of rank locations across the area, although this is not directly in the gift of the licensing section.

Clear consideration of rank locations, particularly in terms of how they might service those in wheel chairs would also be a benefit.

Appendix 1 – Industry statistics

Bradford

Limit in place since 1978 (DfT 2005 information)

	hcv	phv	lv total	hcd	phd	total d		Operators	% hcv WAV	% phv WAV
1994D	223			386			**1994D**			
1997D	223	1532	1755	417	1916	2333	**1997D**		4	
1999D	224	1506	1730	_340_	_1530_	1870	**1999D**	26	11	
2001D	224	1400	1624	263	1674	1937	**2001D**	104	5	
2004D	224	1800	2024	300	2000	2300	**2004D**	180	5	
2005D	224	1800	2024	300	2000	2300	**2005D**	180	5	
2007D	224	2025	2249	290	2257	2547	**2007D**	186	9	
2009D	224	2025	2249	290	2257	2547	**2009D**	186	9	
2010N	222	2048	2270	_335_	_2432_	_2767_	**2010N**	_149_	36	_4_
2011D	221	2012	2233	380	2606	2986	**2011D**	111	70	6
2012N	222	2055	2277	_369_	_2630_	2999	**2012C**	_109_	75	6
2013D	220	2088	2308	357	2654	3011	**2013D**	107	96	7
2014N	222	2178	2400	_354_	_2677_	3031	**2014N**	_105_	85	7
2015D	222	2350	2572	350	2700	3050	**2015D**	102	95	7
2017D	222	3024	3246	339	3861	4200	**2017D**	112	99	
2018C	222	3200	3422	339	4200	4539	**2017C**	112	100	

Appendix 2 – List of ranks

Location Name	Operating Period	No. spaces
Bradford Interchange	24	9
Bingley, Wellington St	24	5
Norfolk Gardens	24	10
Bank St	24	8
Forster Sq Station	24	8
Westgate	24	10
Westtgate, Oastler Centre	24	1
Chester St	20:00-03:00	4
Rawson Square	24	9 in 3 blocks
Great Horton Rd	23:00 - 03:00 Lahore, 18:00-04:00 Weth	8+8
Morley St	12:00 to midnight and 24 hr	10+4
Ilkley, Brook St	24	2
Ilkley, Railway Road	24	6
Shipley, Kirkgate	24	7+1
Keighley, Cooke St	24	8
Keighley, High St	22:00-05:00	2
Drake St, Courts	24 hrs	2+3
Sackville St	18:00-04:00	6
Bingley, Chapel Lane	24	7
Rawson Road	24	3
Bridge St	24	4
Bridge St, Rimmingtons	18:00-08:00	3
Cheapside	23:00-03:00	1+1+? (says total = 4)
Infirmary St	24	6
Nelson St	24	10
Vicar Lane, Hollywood Bowl	24	12
Shipley, Market St	23:00-03:00	3
Keighley, North St	23:00-05:00	16
Keighley, Hanover St	24	3
Baildon, Northgate	24	1

Appendix 3 – Timetable of rank observations

Please see separate document

Appendix 4 – Detailed rank observation results

Please see separate document

Appendix 5 – Detailed on street interview results

Please see separate document

Appendix 6 List of Stakeholders consulted

Key consultee	Response
Supermarkets	
Booths, Ilkley	Y
Asda, Keighley	Y
Asda, Shipley	Y
Co-op, Baildon	N
Morrisons, Ingleby Road	N
Tesco Superstore, Bradford	Y
Asda Little Horton	Y
Asda Superstore Bradford	Y
Hotels	
Five Rise Locks Hotel	Y
Mercure Bradford	Y
Kings Head Hotel Keighley	Y
The Crescent Inn, Ilkley	Y
Ford House Farm, Baildon	Y
The Westleigh Hotel, Bradford	Y
Great Victoria Hotel, Bradford	Y
Castle Hotel Bradford	N
Restaurants / Cafes	
Jaynes Sandwich Bar, Ilkley	Y
Banjos, Shipley	Y
Ponte Vechhio, Keighley	N
Filmore and Union, Ilkley	N
Verona Pizza, Baildon	N
Sweet Centre Restaurant, Bradford	N
Omah Khans Bradford	N
Cyrus Persian, Bradford	N
Entertainment	
Bingley Little Theatre	N
Go Bowling, Keighley	N
Keighley Picture House	Gone?
Manor House Museum, Ilkley	N
Bradford Alhambra	N
Public Houses	
The Brown Cow, Bingley	Y
The Boathouse, Shipley	Y
The Dickie Bird, Keighley	Y
Friends of Ham, Ilkley	N
The Corn Dolly, Bradford	N
The Fighting Cock, Bradford	N
Shoulder of Mutton, Bradford	N

Night Clubs	
K2, Keighley	N
Flares and Reflex, Bradford	N
NE2 Nightclub, Bradford	Gone?
Blaze Nightclub, Bradford	N
Club Railway, Bradford	N
Candy, Bradford	N
Déjà vu, Bradford	N
Other key stakeholder groups	
People First	N
Bradford Network	R
West Yorkshire Police	N
Guide Dogs	Y
Hospitals	N