Bath and North East Somerset Council
Taxi unmet demand survey

September 2023

Executive Summary

This report has been undertaken on behalf of B&NES 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 area has continued to see reducing levels of demand at the local ranks. This is in spite of people being happy with the service they receive and from a high level of awareness that hackney carriages are available and are recognisable. The continued impact of national and local apps that mean people do not have to go to ranks to obtain vehicles continues to erode more standard obtaining of vehicles at ranks. The introduction of e-scooters may have also eroded more potential trips. There is some evidence that the continuing trend towards apps is getting some bad press from people experiencing surge pricing, tipping them back towards more traditional offer albeit marginally.

The lack of significant unmet demand means the possibility exists of retaining the current vehicle limit policy, and there is no need for extra vehicles at this time. This time service at the station rank is worse than at council ranks, and their inclusion in the overall level of service takes the level of unmet demand very close to levels that would be counted as significant. However, the issue of the supplementary permit at the station does not appear to be the full explanation rather reduced patronage from reduced rail usage may well have led to less vehicles servicing this location. It is also interesting that overall levels of latent demand are reduced, a national trend counter to increased levels of waiting.

The lack of interest in taking up the spare plates is further evidence that the trade do not appear to see any case for expansion of their numbers.

Retention of the limit implies need for fresh review, with rank surveys no later than three years from the date of this snapshot. This should not occur with rank surveys later than February 2026 unless policy or legal backgrounds change.

Contents

1 General introduction and background

B&NES 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.

The Best Practice Guidance

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".

Background

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

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

The legislation around licensed vehicles and their drivers has been the subject of many attempts at review. The limiting of hackney carriage vehicle numbers has been a particular concern as it is often considered to be a restrictive practice and against natural economic trends. The current BPG in fact says "most local licensing authorities do not impose quantity restrictions, the Department regards that as best practice".

The most recent reviews were by the Office of Fair Trading in 2003, through the production of the BPG in 2010, the Law Commission review which published its results in 2014, the Parliamentary Task and Finish Group which reported in September 2018, the Government Response in February 2019 and the consultation on "Protecting Users" which closed on 22 April 2019 that then resulted in issue of the "Statutory Taxi and Private Hire Vehicle Standards" (STPHVS) on 23rd July 2020. A revised full Best Practice Guidance document was issued and consulted upon during 2022 but despite its final issue being noted as 'imminent' at the time of writing this Report, nothing had been issued, and certainly all our work was undertaken well before any introduction of the revised BPG.

None of these resulted in any material change to the legislation involved in licensing. Other groups have provided their comments (including the Urban Transport Group and the Competition and Markets Authority) but the upshot remains no change in legislation from that already stated above.

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 utilising a public interest test determined by the Secretary of State. It also suggested the three- year horizon also be used for rank reviews and accessibility reviews. It is assumed the Government response to the Task and Finish Group is now effectively the current reaction to this extensive research.

Current Government Policy review status

As noted above, the revised BPG remains awaiting the results of deliberation on the consultation results - the April 2010 BPG therefore remains valid for our review.

The present background to policy

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.

Some authorities are considering using deregulation in favour of more sustainable vehicle types as a further potential option of quality restriction given the urgent need to improve overall vehicle emission standards.

B&NES introduced a clean air zone in March 2021 which applies to any private hire vehicle or hackney carriage that does not meet its standards. There was an exemption for a short while to help the trade adjust but this has now ended.

Industry Standard evaluation of significance of unmet demand

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

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 hailing and telephone bookings, latent and peaked demand, wide consultation and publication of "all the evidence gathered".

The latest STPHVS required a response given to the DfT by the end of January 2021 in terms of consideration of the measures included in that document, principally production of a comprehensive policy document, review of if CCTV might be mandated and documentation of passenger complaints.

Case law and unmet demand

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 that would be 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). After this case, the latent demand questions were added to on street interviews to feed the latent demand factor inserted into the ISUD industry standard calculations.

Recent Challenges

2019 saw three challenges with respect to surveys of unmet demand. All three found in favour of the current methodology being undertaken. A key focus was the need for a robust and up to date independent survey report being available. In one case it was made clear the current guidance is based on the 2010 BPG, whilst in another case having a valid survey meant those challenging had no case for their proposed challenge, and in the final case an authority was clearly told they could not rely on a very old survey which itself could not be produced.

Most recent changes relating to demand

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

The two 2022 Acts make small but significant changes. The 2022 Acts are the "Taxis and Private Hire Vehicles (Safeguarding and Road Safety Act) (31 March 2022)" and the "Taxis and Private Hire Vehicles (Disabled Persons) (28 June 2022)".

The first makes it mandatory for any licensing authority in England that has information about a taxi (hackney carriage) or private hire vehicle (phv) driver licensed by another authority that is relevant to safeguarding or road safety concerns in its area to share that information with the authority that issued that drivers licence.

The second amends the Equality Act 2010 to place duties on taxi and phv drivers and operators such that any disabled person has specific rights and protections to be transported and receive assistance when using a taxi or phv without being charged extra for doing so.

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

The current status regarding unmet demand studies

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

It is also felt important to have consistent treatment of authorities as well as for the same authority over time, although apart from the general guidance of the BPG there is no clear stipulations as to what this means in reality, and certainly no mandatory nor significant court guidance in this regard.

During September 2018 the All-Party Parliamentary Group on taxis produced its long-awaited Final Report. There was a generally accepted call for revision to taxi licensing legislation and practice, including encouragement for local authorities to move towards some of the practical suggestions made within the Report. The Government has broadly supported the recommendations of this Task and Finish Group.

Despite some opposition from members of the group, the right to retain limits on hackney carriage vehicle numbers was supported, with many also supporting adding a tool which would allow private hire numbers to be limited where appropriate, given reasonable explanation of the expected public interest gains. This latter option is now being taken forward in Scotland, with two studies published and the Scottish Government having provided guidance on assessing over provision of private hire vehicles, although the English Government response did not support this option.

As already stated, other groups have provided comments giving their views about licensing matters but the upshot remains no change in legislation from that already stated above. The Scottish Government are moving forward in terms of their application of the potential limiting of private hire vehicle numbers but this is specific to Scottish law and not presently relevant to the English licensing authorities.

Conclusions

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.

Coronavirus

The serious Covid-19 virus took hold in the UK during March 2020. The previous study had been completed just ahead of that onset. By the time this refreshed study was undertaken, maintaining the three year repeat encouraged by the BPG, actions relating to COVID were no longer of significance although its impact and that of other changes remained.

2 Local background and context

Key dates for this report title for B&NES Council are:

- appointed Licensed Vehicle Surveys and Assessment (LVSA) on 1 February 2023
- in accordance with our proposal of August 2022
- as confirmed during the inception meeting for the survey held on 2 February 2023
- this survey was carried out principally in February / early March 2023
- On street pedestrian survey work occurred in mid-February 2023 (on a Tuesday and a Wednesday)
- the video rank observations occurred early February 2023 at a similar period to the observations in 2020
- Licensed vehicle driver opinions and operating practices were canvassed using an electronically available survey during February and March 2023
- Key stakeholders were consulted during February and March, although few responded.
- A draft of this Final Report was reviewed by the client during June 2023
- and reported to the appropriate Council committee following acceptance by the client.

Our previous report for B&NES was reported to the appropriate Council committee in October 2020.

B&NES Council is a unitary authority. It was set up in 1996 amalgamating both Bath City and Wansdyke councils at the point when the higher-level Avon County Council was abolished.

Policy Background

In terms of background council policy B&NES being a unitary authority has all highway, transport and planning policies under its direct control. At the time of the last survey, an new draft Joint Local Transport Plan (JLTP4) had been prepared by the West of England Combined Authority (WECA) and the four constituent authorities including B&NES. It sets out the vision for transport investment covering 2020 to 2036. It was published in January 2019 with a final document now dated March 2020. WECA was established during 2017. The information below is quoted from the latest documentation available as at early June 2023 but is mainly repeating the documents available (and not necessarily the views of the authors of this report). There appears to be no change since the last survey in overall transport policy terms with that policy covering the period 2020 to 2036.

JLTP4 has a banner title of "Connecting people and places for a vibrant, inclusive and carbon neutral West of England". The current fast facts section suggests 29% of B&NES carbon emissions come from transport, with 92% of nitrogen oxide emissions similarly caused. A third of car journeys are made within the city, some 50,000 on a typical weekday. 75% of people driving to work in Bath do so from outside the city. 20,000 residents live and work in Bath with 16,000 further workers coming into the city per day.

Feedback was invited with the Bath Transport Delivery Action Plan consultation report produced in May 2021. It led to update of the JLTP4 document in May 2022.

The stated aim is that the West of England would be a carbon neutral community by 2036, with walking and cycling preferred for shorter journeys, and the vast majority of vehicles on the road decarbonised. The JLTP4 is assisted by the Local Industrial Strategy. It is noted that there is need to change the way travel occurs. This will include reallocation of road space to sustainable transport modes.

To set the background for JLTP4 a Joint Transport Study was undertaken. A wider context has been set within the Western Gateway Sub National Transport Body (SNTB) that includes North Somerset, the Bournemouth Christchurch Poole, Gloucestershire, Dorset and Wiltshire councils. Looking to the past, JLTP3 saw completion of the Bath Transportation Package with expansion of Park and Ride and reconfiguration of parts of the City road network.

Public views on JLTP4 were obtained in early 2019. An important response was that people felt the main priority for transport spending was reallocating highway space, new and improved rail services, developing a comprehensive and safe active travel network, and constructing a mass transit network.

Figure 2.1 in the "Adopted Joint Local Transport Plan 4" document, covering a high-level summary for the West of England. Statistics suggest 66% of commuting was by car, with that level of trips expected to increase by 25% to 2036. Public transport commuting is 9%. 20% of the population are over 65 and over 300 premature deaths per year are linked to NO2 across the West of England. It was accepted that travel demand was still growing and the offer of more sustainable modes need to be improved significantly. High levels of inequality exist linked to high costs of living. Women and older people are particularly less likely to have higher mobility access.

JLTP4 suggests that, amongst other matters, connectivity needs to be increased and transformed, enabling seamless door to door movement of people and goods. Access for those with visible and hidden disabilities needs to be improved, as well as that for those in rural, remote and deprived areas. All this needs better information on travel decisions.

Section 5 begins stating "We will provide a well-connected, sustainable, transport network that offers greater, realistic travel choice". Figure 5.2 suggests that hackney carriage and private hire can improve connectivity at local, within West of England (WoE), and beyond WoE levels.

The impact of tourism on Bath is documented. 5.8 million visitors contribute £432m per annum to the City. Improved parking management is noted as a key element in transport strategy for B&NES.

Ref L4, support opportunities for all sectors of the population to access the services they require, wherever they live, confirms support for the role of hackney carriage and private hire vehicles. It goes on to state (these sections are copied in full and may not reflect our views with reference to the relevance or otherwise of these statements):

"Taxis (hackney carriages) and private hire vehicles have a role to play in providing accessibility to different sectors of the population. They can be cheaper than car ownership and play a role as part of a longer journey using public transport, for example by providing links to or from rail stations, as well as some complex home to school transport journeys. Taxis and private hire vehicles provide a necessary service to those who are physically unable to access public transport and require a door-to-door service.

We will work with taxi operators to review charging policies, ensuring taxis are fair, competitive and accessible for all. We will work to ensure the provision of adequate centralised taxi waiting and drop off facilities in city and town centres, and work with taxi operators to ensure that services are available to all as an alternative to the private car.

The emergence of on-demand taxi services illustrates how traditional provision may be unappealing to some segments of the population, as more demand responsive transport becomes increasingly popular. Mobile phone and web communications are enabling individuals to link with cars for specific journeys, providing a reliable and affordable alternative to traditional taxi or bus use.

Shared taxis can bolster existing public transport provision during busy periods such as the morning and evening peak hours, filling gaps in the public transport network by serving remote locations that are currently not served by public transport. By encouraging the use of electric vehicles as part of taxi fleets, taxis can not only contribute to removing traffic from our roads and reducing congestion, but also improve air quality.

We will continue to support the introduction of shared use taxi schemes that support the local bus network and provide flexible attractive alternatives to those who would otherwise drive.

We will continue to work with local taxi operators to encourage them to look at adopting on-demand services through smartphone technology."

The document also references the Bath BREATHE Clean Air Zone project. This has moved forward with significant thought given from within the Licensing team about how to deliver this whilst ensuring public demand remains best met. It was one of the first schemes to be implemented and has generally been well received and seems to have been successful. An exemption was offered to 15 March 2023 for WAV hackney carriage and private hire vehicles but is now no longer in place.

E-scooters

Bath was one of several areas where e-scooter trials were put in place. A national DfT review found that the West of England schemes here and in Bristol were the locations seeing most rides by a significant margin, leading to commissioning of local review published in May 2023. This more detailed study found 19,552 trips in Bath using 363 e-scooters. There were 5,325 users identified with 75% of trips under 2.5km. 28% of rides were in the 1600-1900 period and 14% 0700-1000. 85% were 18-35 year olds. The Summer 2021 survey found 8% of e-scooter trips were formerly by either taxi or ride-hail, with a later survey finding this value 9%. The Bath area was extended in 2022 and continues to be successful. This study therefore suggests e-scooters would have reduced licensed vehicle usage in Bath at the time of our survey, although it is not clear given the age group if the main impact would be on private hire or hackney carriage.

Population background

The authority has a 2021 population of 193,400 using the initial estimates from the 2021 census (very similar to the 193,456 in 2021 using the 2021 estimates currently available from the 2011 census, 2016 revision, estimating 195,704 for 2023). Whilst there had been a 0.7% increase in population from 180,124 in the 2014 survey to 181,500 in the 2017, and 6% more to the 192,437 expected around the last survey, growth was 1.6% to 2023 suggesting moderate growth in potential demand for licensed vehicles.

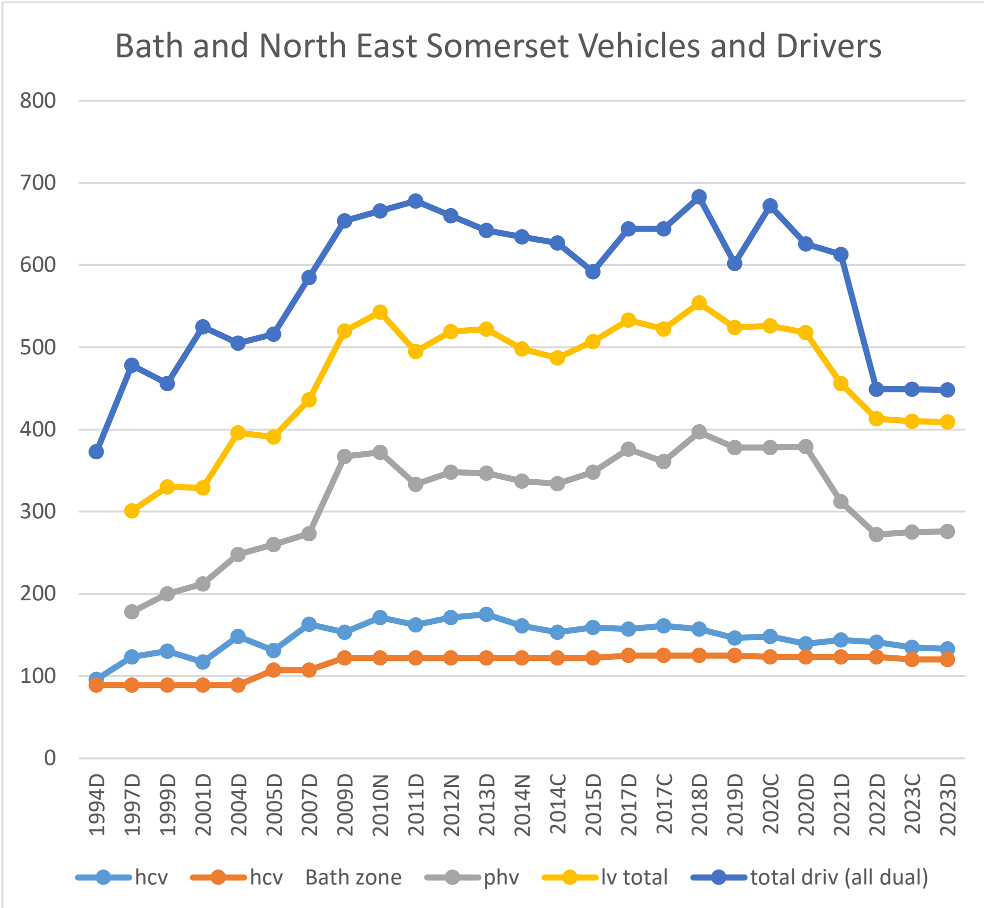
Limit Policy Historical Background

B&NES Council has chosen to utilise its power to limit hackney carriage vehicle numbers, and as far as we are aware has done so since at least 1994. Prior to this survey, previous tests of the validity of the limit and the level of the number of vehicle licences were undertaken in 2020, 2017, 2014, 2011, 2008 and on several occasions prior to that. This is one of the most regular reviews of demand, following the Best Practice Guidance exactly.

B&NES is also one of the few remaining authorities operating a zoning system. The Bath City zone, equating to the former City Boundary, retains a limit on hackney carriage vehicle numbers, whilst the outer zone, the remainder of the more rural area agglomerated into the new authority, has no limit on hackney carriage vehicle numbers. Cornwall retains a zoning system, but most other similar systems are in the North East, primarily West Yorkshire.

Statistical Background

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. This figure includes the DfT March 2023 recently released data for completeness but makes no reference to this otherwise.



Key: hcv – hackney carriage vehicles
Phv – private hire vehicles
Lv – total licensed vehicles, hackney carriage and private hire
Driv – drivers
D=DfT source, N=National Private Hire Association Source, C=council source

Licensing Statistics from 1994 to date

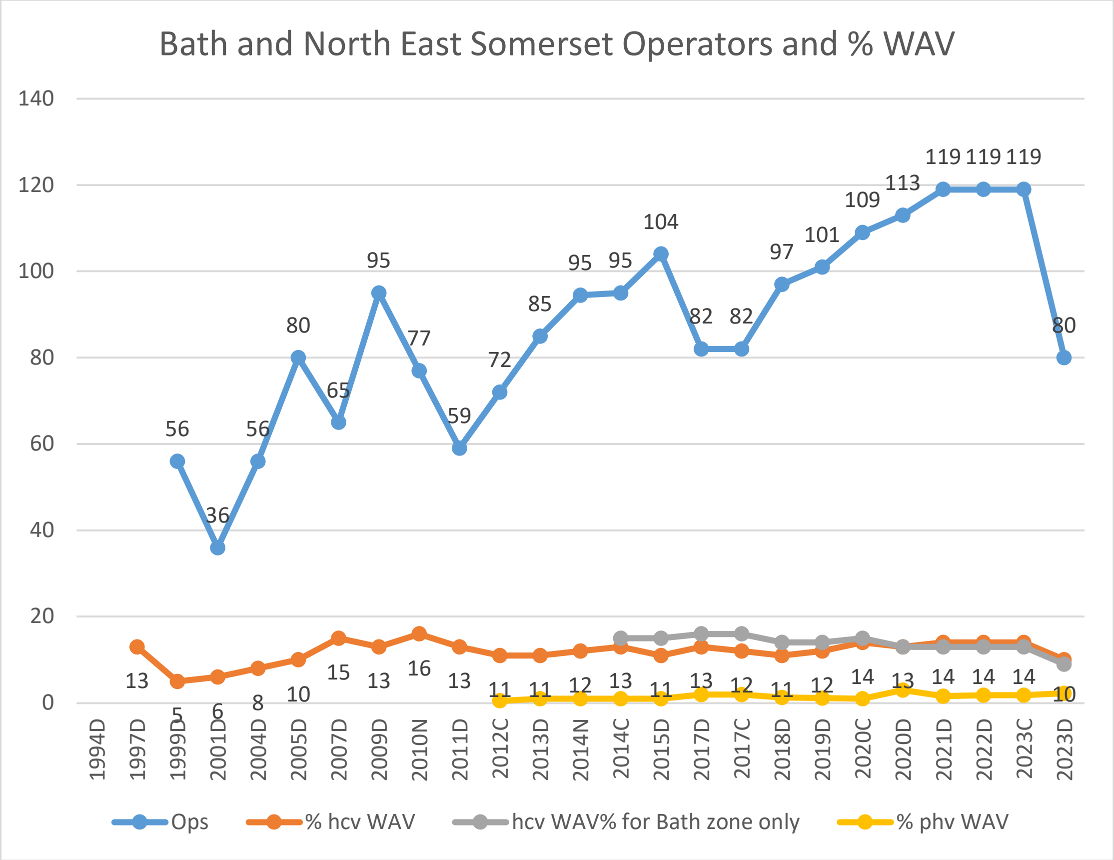
The graph shows the three issues of plates in the Bath limited vehicle number zone. The actual number of motorised vehicle plates active in the Bath zone at the time of the survey (with the horse-drawn vehicle not appearing to be trading and three motorised vehicles not available for service at the time) was in fact 120. The overall trend in the outer zone hackney carriages is a gentle decline in numbers, with a smaller decline in the limited central zone numbers. We were advised there did not appear to be any interest in taking up the spare plates by the time this Report was written.

Private hire vehicles reduced strongly during the pandemic with just a marginal increase between the March 2022 DfT figures and those at the time of the survey in early February 2023, and again to the latest DfT statistics for end of March 2023. This puts private hire vehicle numbers at a similar level to which they were last in 2007, but still higher than at the start of records in 1997 but well down on the peak of 2017.

The authority has long had dual driver licences, allowing people to choose the best kind of vehicle to use, and allowing transfer between vehicle types without hindrance. From March 2020 when the office closed due to COVID, no new driver applications were accepted until November 2021, meaning that the number of new driver applications was stunted. There were 59 in 2017, 46 in 2018, 74 in 2019 (the peak in recent times), 14 in 2020 (but only for January / February), 3 in 2021 (effectively only in December), 26 in 2022 and 19 to date (end of July) 2023, with the 2022 value likely to be exceeded.

There is now almost parity between the total number of licensed vehicles and the number of drivers.

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 legal 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.



Key: Ops – Operators; % hcv WAV – percentage of hackney carriage vehicles which are Wheel Chair Accessible style D,N,C – see key above for source of data

Operator numbers and levels of WAV provision in the fleet

This graph shows an overall and general increase in the level of private hire operators in the area which has now continued since 2017 consistently. This suggests continuing levels of competition in the industry and a very clear increase in the number of operators available giving drivers more choice in who they might work for.

The picture for WAV style vehicles remains similar – with the current zone 1 level being 12%, with just one hackney carriage WAV for zone 2, and a very small proportion in the private hire fleet.

Compared to the national situation for WAV style vehicles from the March 2023 DfT statistics, Bath has around 9% of its total licensed fleet of WAV style and in this respect is 164th equal out of the 267 authorities compared with five other licensing areas including Barnsley that retains a limit and Newark, South Lakeland, Rochford and Fylde that do not.

The national average is that 11% of licensed vehicles in English licensing authorities (both hackney carriage and private hire) are WAV style (a number that has fallen from 13% since 2022). These figures exclude London and are the same with or without the 100% hcv WAV fleets.

Split by hackney carriage and private hire, the 2023 national average, again excluding London, was 39% (40% 2022 and 42% in 2019) WAV in the hackney carriage and 3% (was 4% 2022 and 3% 2019) WAV in the private hire fleets. There were 101 (122 in 2022) licensing authorities with lower proportions of WAV in their hackney carriage fleet than B&NES – 38% of all licensing authorities (this was 42% in 2022 and 41% in 2019).

Of the other authorities with higher levels, 55 have fully WAV fleets. This implies there are 110 authorities that do not have fully WAV fleets that have more WAV proportionately in their hackney carriage fleet than B&NES, suggesting B&NES is more average than the figures suggest (this number was 110 in 2019, showing the situation has not improved). Three of those are very close to being fully WAV.

National application of limit policies

The Department for Transport publish new data pertaining to the end of March each year in July of that year. At the time of writing this report, data was available for 2022. We also keep up to date with revisions as far as is possible although not all authorities necessarily keep us up to date.

At the end of March 2022, before various authorities became unitary on 1 April that year, there were 281 separate licensing authorities in England. The 2023 data became available while this report was being finalised but does not give significantly different answers so the 2022 review has been retained.

After updating with changes known, 69 retain a limit on the number of hackney carriage vehicles. This is 25% of the total. A further 1.4% (one of which is B&NES) limit but only a part of their area. The others in this category are Dorset, Bournemouth/Christchurch/Poole and Calderdale. A further 1.1% limited at the time of the DfT data collection but due to becoming unitaries the day after chose to either remove all zones or to remove the limit if they retained zones.

A further 1.4% stated that they limited numbers but only of particular types, but this is in reality 'quality' not quantity restriction and there are many other authorities that have similar policies but do not report them in this section, meaning this is an underestimate, but is not really true Section 16 limitation.

Remarkably, although the number of limited authorities continues to reduce, the overall decline is not particularly rapid, and many of those retaining limits remain very certain that they have good reasons to do so.

App usage

In recent years more people have been using ‘apps’ (and other increasingly ‘modern’) methods of obtaining licensed vehicles. These have both international and national forms, with two international apps active in Bath (although one began two years prior to the other). There is one national app which is a national company that began by taking over the largest local company since the last survey. Whilst these are not direct hackney carriage demand, usually undertaken on private hire operating platforms, many can confuse this option with ‘hailing’ a vehicle which is a hackney carriage only option.

The national app told us at the time of the 2020 survey that the proportion of their bookings that have been using their app has been increasing. In October 2018, 12.6% of all their bookings were on their app. This rose to 17.9% in February 2019, 23.6% in October 2019 and 27.9% for February 2020. Comparing October 2019 with February 2019, total bookings were 16% down in February whilst for the same comparison ending in February 2020, the difference was 11%. Interestingly comparing year on year, the February values were about 1% higher in 2020 whilst the October were 5% lower for the latest value. That company has now become a more national app operation, but not any of the international apps.

It is understood that an electric scooter scheme (Voi) is being introduced to the City, which may lead to reduced usage of local licensed vehicles. Further detail of this was provided above – the report from May 2023 suggests that up to 9% of e-scooter trips replaced trips by ‘taxi or ride/hail’.

3 Patent demand measurement (rank surveys)

As already recorded in Chapter 2, control of provision of on-street ranks in B&NES is directly under the control of the authority, albeit another part and not directly licensing. No changes have occurred since the 2020 survey. One unused location in Milsom Street was removed some time ago (and is last seen on internet pictures in 2014).

Our methodology involves a current review both in advance of submitting our proposal to undertake this taxi 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).

Overview of rank observations

The rank observations were analysed to understand the level of vehicle and passenger activity at or around the ranks (in any manner felt to affect the operation of the rank itself). During the course of the survey, 8,127 (9,935 in 2020) different occurrences were noted, ranging from vehicle arrivals and departures to passenger arrivals, walk-aways, vehicle and passenger departures, activity of other vehicles at or near the ranks, and general notes about operation. A total of 178 hours of observations were included in the detailed set.

In terms of the overall activity as recorded above, 51% (38% 2020) were at the private Bath Spa station rank, 39% (36%) at the Abbey Rank, 1.2% (10%) at Westgate Buildings, 8.4% (8%) at Southgate Street, 0.5% (7%) at George Street and just 0.4% (1%) at the Henry Street rank near Marks and Spencer. This demonstrates strong reductions in activity at Westgate Buildings and George Street in general.

There were 2,816 (3,460 in 2020) vehicle arrivals and departures, 2,477 (4,508 in 2020) passenger arrivals, 32 (61) apparent walk-aways and 2,801 (4,447) instances of people leaving the locations in vehicles (this does not count multi-occupancy so is not the total passengers).

For this survey, 69% (last time over half) of the apparent walk-aways were from the private Bath Spa station rank. 28% (last time just two) walk-aways from the Abbey rank. The other walk-away was from Southgate.

Considering the records of total vehicle arrivals and departures, similar proportions were found to the above, with 49% (36%) at the private Bath Spa station rank, 39% (37%) seen at the Abbey rank, 1.4% (10%) at Westgate Buildings, 10% (8%) at Southgate Street, 0.7% (8%) at George Street and just 0.5% (1%) at Henry Street.

With respect to private cars, the overall level was 9% (8%) of all vehicles, with hackney carriages being 88% (86%). Goods vehicles were 0.9% (1%), private hire 2% (4%) and just a handful of emergency vehicles. In terms of the worst rank location for cars, this was Westgate Buildings where 87% of vehicles observed at or near the rank were cars (13% last time), George St 74% (32%), Southgate Street 55% (45%) and M and S 41% of observed vehicles were cars. All are ranks within the main street where the ranks are rarely full of hackney carriages. For this survey, the Abbey saw 4% of vehicles being cars (1% last time), whilst for the station the level was the same 1% of vehicles as private cars given the nature of these locations and the relatively high usage by hackney carriages at all times of day. It must be noted that the observations only cover the periods the ranks are actually active legally as ranks. Where ranks are part-time there is often over-spill of private parking into the early hours of rank usage.

Overall rank usage estimates

The detailed rank observations were used to produce average weekly estimates of demand for hackney carriages. This information was also compared to previous estimates undertaken using the same basis.

Rank	2023	2020	2017	2014	2011	2008
Bath Spa Station	3,794 (59%)	6,308 (59%)	7,303 (50%)	7,982 (45%)	4,877 (50%)	3,705 (41%)
Abbey	2,568 (40%)	2,370 (22%)	6,323 (43%)	8,212 (47%)	4,085 (42%)	5,092 (51%)
Southgate St	80 (1.2%)	225 (2%)	115 (1%)	140 (1%)	n/a	n/a
George St	4 (0.1%)	186 (1.7%)	176 (1%)	222 (1%)	96 (1%)	217 (2%)
Henry St	1 (0.00%)	33 (0.3%)	n/a	Not surv	Not used	Not surv
Westgate	0 (0%)	1,615 (15%)	757 (5%)	1,044 (6%)	669 (7%)	972 (8%)
Queen Square	n/a	n/a	n/a	12 (0.0%)	n/a	n/a
Walcot St	n/a	n/a	Not surv	Not avail	Not used	94 (1%)
South Parade	Gone	Gone	Gone	Not surv	Not used	Not surv
Total	***6,446***	***10,737***	***14,673***	***17,612***	***9,727***	***10,080***
Growth from previous	***-40%***	***-27%***	***-17%***	***+81%***	***-4%***	***n/a***
Growth from 2008	***-68%***	***+7%***	***+46%***	***+75%***	***-4%***	***n/a***

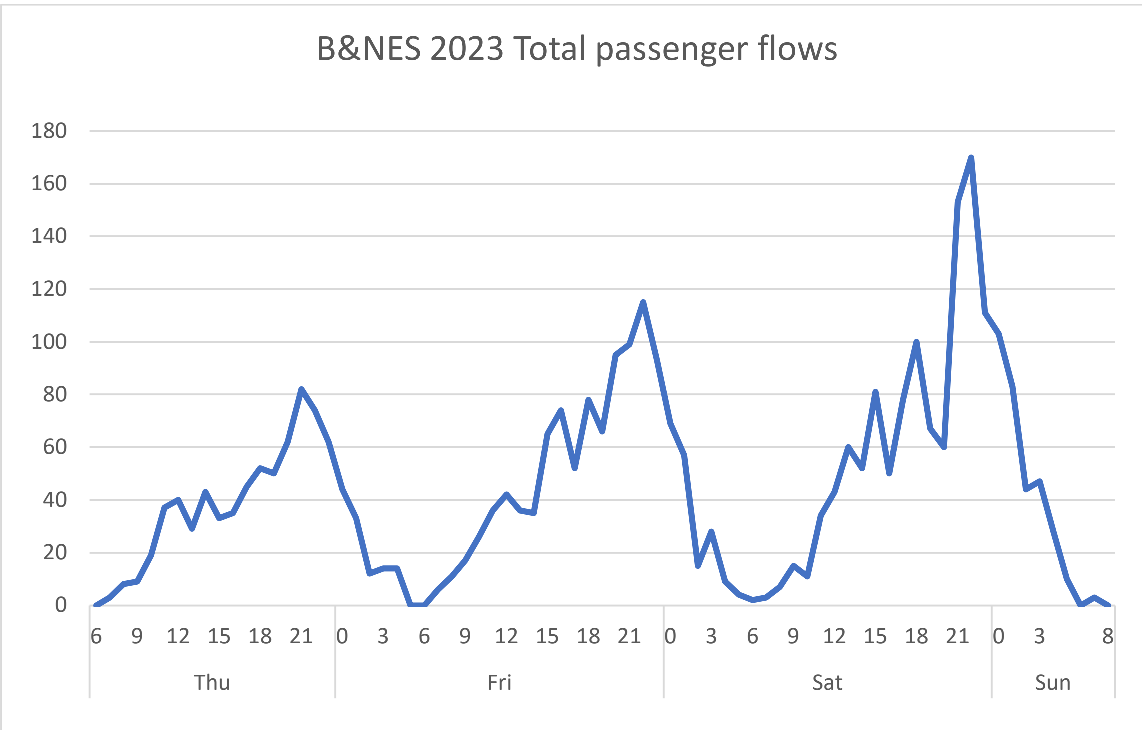
The table above shows the estimated weekly number of passengers for all active ranks in the B&NES central zone is 6,446. This is 40% less than that observed in 2020, a true decline given that the observations were undertaken at almost the same time of year as those in 2020.

For this set of observations, the order of levels of usage remains essentially the same as in 2020 and 2017. The private rank at Bath Spa station remains the most important rank, with exactly the same share of usage now as in 2020. However, the flows at the Abbey actually were 8% higher this time, moving its share up to 40%. Westgate Buildings did not see any usage at all this time, falling from third place to sixth, whilst both George St and Henry St are effectively unused. Southgate Street fell in usage and share.

These changes mean that the hackney carriage rank-based usage is now almost exclusively focussed on the two main ranks, one of which requires a permit.

Rank usage by location and time

The graph below shows total passenger flows using the data from each rank and day of the survey. For this survey all ranks were covered on all days providing a full picture of demand over the three days of observations.

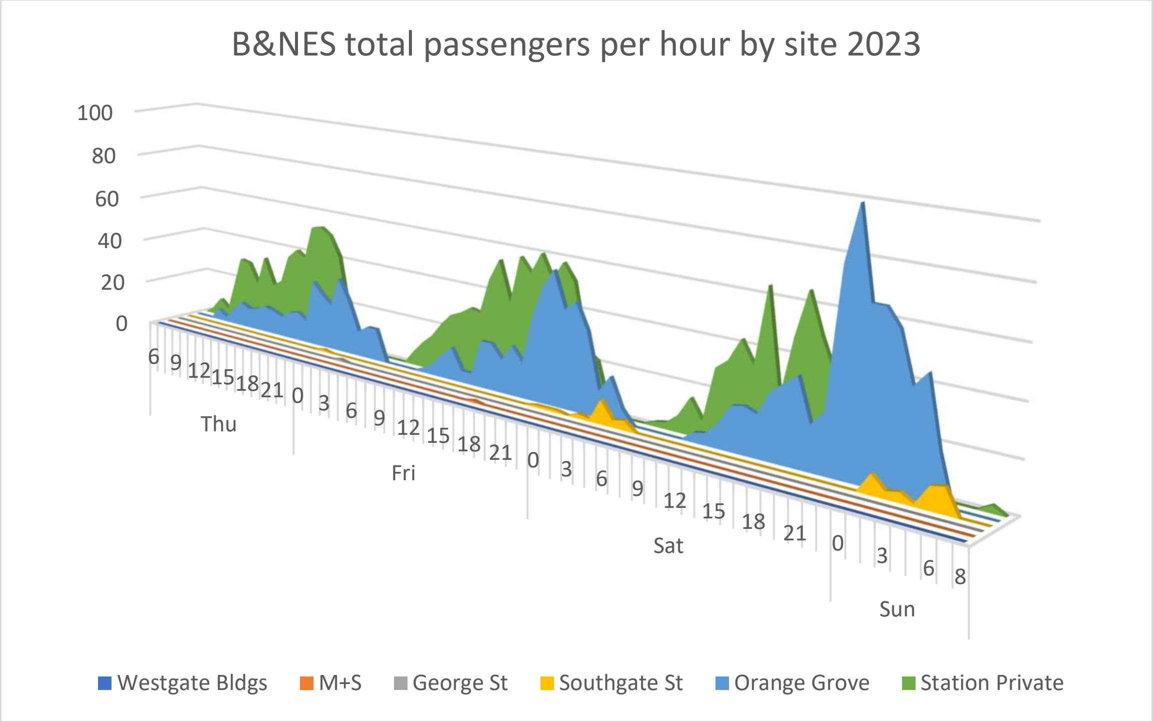


The graph demonstrates growth of demand from Thursday through Friday to Saturday. Inspection confirms that from the 07:00 hour on the Thursday, right through to the 08:00 hour on the Sunday morning there are just two hours early Friday morning (05:00 and 06:00) and two hours on Sunday morning (06:00 and 08:00) with no passengers at any rank – last time there were no such hours.

As in 2020, the peak flow observed was on the Saturday night in the 22:00 hour. Average passengers per hour are 45 (54 in 2020), with the peak flow 3.8 times this level, less than that in 2020 (just under five times). Again the Friday night peak was in the same 22:00 hour as in 2020, and was again about two thirds the level of the Saturday night. This suggests that patterns of demand are very similar despite the overall reduction in level.

Comparing average flows per hour for each day, Thursday sees 33, Friday 47 and Saturday 59. It should be remembered that these flows are total passengers, not journeys, with average vehicle occupancy over the survey being 1.5 persons per vehicle.

The graph below compares individual sites over the study observation period. This clearly demonstrates the importance of the private Bath Spa Station rank to overall hackney carriage rank-based demand although the Abbey (Orange Grove) rank is clearly critical to the night life of the area, on all nights.



Friday levels of demand at the Bath Spa Station rank tend to remain relatively stable from late afternoon, as in 2020, although Thursday afternoon sees almost similar levels of demand but for a shorter period. On Saturdays, the Abbey rank (Orange Grove) dominates from late evening. Southgate Street flows are only in a few late night / early morning cases on Friday/Saturday and Saturday/Sunday.

Weekday and Saturday morning flows are generally dominated by flows at the station rank, with the Abbey rank only really dominant in this survey later on the Saturday night into Sunday morning. On the Friday the station and Abbey peaks coincide much more, which makes servicing such demand difficult.

Surveyed hours with observed unmet demand

Information collected was revised to identify hours by the level of average passenger delay. Of the 297 (286 in 2020) hours observed, 18% (10% in 2020) had some average passenger delay identified. 45% of hours had no activity at all, mainly at the smaller ranks, with the remaining 37% being active but seeing no passenger delay.

Of the hours with delay, just over a third had average delays in that hour of over a minute, and the remainder had delays less than a minute. In 2020 just three hours (1% of the total) had delay averaging over a minute – a very low total, so despite 40% less passengers, overall delay has increased.

Of all the hours with an average passenger delay, 64% were at the station, 28% at the Abbey and 8% at Southgate. All delays at Southgate related to hours with low numbers of passengers, or times of 'thin' demand, hard to meet effectively.

The longest observed passenger wait was 15 minutes (14 in 2020). This hour, 21:00 at the station on the Saturday, also saw 5 others wait between one and five minutes, 18 6-10 minutes and a total of three over 11 minutes. This resulted in the third highest average passenger delay in an hour, 2 minutes and 42 seconds.

The longest average passenger delay in an hour was just over five minutes. This was at the Abbey rank but when overall passenger numbers were low (04:00 Saturday morning). The maximum wait was 11 minutes with two people experiencing this delay and another waiting between six and ten minutes. However, there were no other average passenger delays in any hour greater than three minutes.

The second and fourth largest average passenger hourly delays, of 2 minutes 44 seconds and 2 minutes 26 seconds, both occurred at the Southgate Street location. Both were at times when overall demand was low and therefore vehicles were not necessarily expecting demand. This is termed 'thin demand' and is not usually considered to be unmet demand that could be reacted to by need for further vehicles.

The third largest delay did arise from a larger number of passengers resulting in an average delay of 2 minutes 42 seconds, and a worst-case delay of just under 15 minutes. There were three people waiting over 11 minutes, 18 between six and ten and five one to five minutes. This accounted for 26 of the 39 people travelling in the 21:00 hour on the Saturday. This was approaching the peak hour in the survey, with the following hour also seeing average passenger delay, but of two minutes.

The worst delay of all those that were under a minute on average was from the private Station rank at 10:00 on the Saturday morning (57 seconds). Two people waited one to five minutes whilst five waited – mostly for around six minutes. Notably there were no average passenger delays at the station of a minute or more in this survey, despite our covering two days.

Further discussion occurs of the significance of the observed unmet demand in the later Chapter.

Persons walking away from ranks

There were 32 occurrences of people being recorded walking away from ranks. Of these, 22, or 69% were from the station rank. 28% were from the Abbey and just one from Southgate. These are small levels although the number of passengers involved (46) is greater than the number of occurrences. There was one group of five that left the station rank but otherwise groups were either a single person or two people.

Frequency of vehicle operation during rank survey

A test was undertaken on the Saturday identifying the hackney carriage plates active at or near the two main ranks in central Bath, Abbey and the Station. During the ten hours observed, some 418 (429 in 2020) different movements by only local B&NES hackney carriages were observed in total.

During the six periods observed in total, a reduced level of 61% (was 73%) of all the available zone 1 hackney carriage plates were observed active. However, the largest proportion in any period was 41% (59% same period in 2020) of the fleet seen in the 22:00 to midnight period at or near Abbey rank. Across the three periods at the Abbey rank, 51% (68% in 2020) of the available hackney carriage fleet was observed. For Bath Spa Station, the proportion of the fleet seen over the three periods there was 34% (lower, but not so much lower than the 37% of 2020).

Looking at the periods separately, the peak activity level at the Station in terms of different plates seen was the 19:00 to 21:00 period, when 24% (26%) of available plates were seen. 14:00 to 16:00 saw 20% (19%) and 00:30 to 01:30 8% (15%). At the Abbey rank values tended to be higher as already noted, with 16:30 to 18:30 seeing 24% (31%) and 02:00 to 03:00 23% (24%). Although this suggests that many were active during the time of the survey, it still shows available headroom within the fleet to meet more demand than was observed. The reduced levels of activity for the same periods is a current national observation, and explains in part why reduced demand from passengers is resulting in increased levels of delay – the reduction in vehicle activity is greater than the reduction in passengers.

When the actual active hackney carriage plates are considered, about 44% (half in 2020) the fleet was seen at or near the Abbey Rank only, 40% (43%) were seen at or near both Abbey and the Station whilst 16% (just 7% in 2020) were seen only at the Station. This suggests there is an impact of the extra permit on plate activity but that even those with permits do not see the Station as a place to get all their fares from. It is interesting, however, that the main change for this 2023 survey has been a more than doubling of the share that worked only at the station.

The figures also suggest that the hackney carriage fleet overall sees most vehicles and most activity in evenings, followed by the next highest levels in the afternoon, with late night / early hours demand seeing the lowest proportions of vehicles and also the lowest numbers of trips. This suggests a relatively low level of night activity in the B&NES economy at the time of these surveys. This could have been influenced by the survey being at the start of February.

Observed usage for those with disabilities

Within the vehicle observations, 14% (18% in 2020) of all those hackney carriages observed at the ranks were identified as appearing to be WAV style vehicles. This is just marginally higher than the 13% in the fleet suggesting such vehicles tend to service ranks more than the typical vehicle. However, some caution is needed as there are some vehicles that appear to be WAV style but may not actually be WAV capable and hard to differentiate.

However, the actual level of usage by people in wheelchairs was very low, with just one passenger observed at the Abbey rank (same as in 2020) and two (one in 2020) at the private Bath Spa Station rank during our survey. The level of people who appeared to be disabled but not needing wheelchairs was slightly higher. There were 20 (19) such observations at the Bath Spa Station rank, eight (five) at the Abbey and none (one in 2020) at Westgate Buildings.

Marshal data for rank usage

B&NES had a long-standing marshal arrangement covering the Abbey rank. In the past data was available from their records to help validate the rank observations. The specific rank marshals funding ended over three years ago and any marshal provision is now part of the wider night time economy, with no data collected of value to this study.

Comparison to national rail information

Statistics are published nationally for all of the 2,645 rail stations in Great Britain. They provide estimated entries and exit totals for the year ending March of the years quoted based on ticket sales and various other assumptions (not direct counts). However, they are accepted as valid levels of station usage and are generally consistent between stations in given years, although the data does vary over the years as methodology and understanding of the data sets increases.

Bath annual patronage position has gone up from 78th to 73rd since the last survey (having declined from 65th in the previous survey). This is despite the impact of the pandemic which using the national annual statistics saw flows down by 81% comparing the year before and the year after the pandemic began. Current annual flows are 36% down, i.e. at 64% of their previous although there has been more return to rail since March 2022 although the rail strikes have reduced the bounce back in the months since Autumn 2022.

For the last available year, there were just under 4.1 million entries and exits from the station. This implies about 40,857 people leaving the station on average per week. Given there were 3,794 estimated passenger departures in a typical week from the station, this implies about 9% leave the station in a hackney carriage from the rank.

The authority includes three other stations, Keynsham, 910th (was 900th) with 298,478 (was 511,642) (192%, was 400% growth since start of statistics), Oldfield Park, 1,034th (was 1,149th) with 238,768 (was 322,654 (114%, was 190%) and Freshford, 2,004th (was 1,971st, with 34,112 (53,368) (87%, was 192%). All have less services than Bath and none have specific licensed vehicle services, although Keynsham and Oldfield Park do possibly have sufficient demand to justify need for at least private hire links although these would need to be demand led as there is no legislation that allows any council to direct where private hire services can or cannot be provided. Further, access points to these may or may not be on railway land, which could add further complications to any arrangements, more so any that involved hackney carriage rank provision.

Rail year (ends March in last year noted)	Entries / exits	Growth / decline
Bath Spa (73rd)		
1997 / 1998	2,681,441	n/a
1998 / 1999	2,760,990	3%
1999 / 2000	2,933,619	6%
2000 / 2001	3,009,640	3%
2001 / 2002	3,108,318	3%
2002 / 2003	3,332,671	7%
2003 / 2004	Not collected	
2004 / 2005	3,726,900	12%
2005 / 2006	3,905,144	5%
2006 / 2007	4,244,776	9%
2007 / 2008	4,478,305	6%
2008 / 2009	4,757,904	6%
2009 / 2010	4,779,480	0%
2010 / 2011	5,217,954	9%
2011 / 2012	5,681,252	9%
2012 / 2013	5,757,880	1%
2013 / 2014	5,990,274	4%
2014 / 2015	6,222,126	4%
2015 / 2016	6,134,318	-1%
2016 / 2017	6,432,334	5%
2017 / 2018	6,395,694	-1%
2018 / 2019	6,538,056	2%
2019 / 2020	6,432,812	-2%
2020 / 2021	1,198,504	-81%
2021 / 2022	4,085,704	+241%
Last three years (19/20 to 21/22)		-36%
Start of statistics to date		+52%

Rail year (ends March in last year noted)	Entries / exits	Growth / decline
Keynsham (910th)		
1997 / 1998	102,253	n/a
1998 / 1999	101,850	-0.4%
1999 / 2000	112,055	10%
2000 / 2001	118,047	5%
2001 / 2002	130,148	10%
2002 / 2003	138,685	7%
2003 / 2004	Not collected	
2004 / 2005	169,101	22%
2005 / 2006	187,693	11%
2006 / 2007	209,593	12%
2007 / 2008	231,326	10%
2008 / 2009	257,110	11%
2009 / 2010	249,842	-3%
2010 / 2011	278,850	12%
2011 / 2012	306,276	10%
2012 / 2013	329,274	8%
2013 / 2014	358,186	9%
2014 / 2015	412,602	15%
2015 / 2016	424,032	3%
2016 / 2017	472,630	11%
2017 / 2018	454,164	-4%
2018 / 2019	511,642	13%
2019 / 2020	532,966	+4%
2020 / 2021	87,304	-84%
2021/ 2022	298,478	+242%
Last three years (19/20 to 21/22)		+21%
Start of statistics to date		+192%

Rail year (ends March in last year noted)	Entries / exits	Growth / decline
Oldfield Park (1,034th)		
1997 / 1998	111,442	n/a
1998 / 1999	120,705	8%
1999 / 2000	120,074	-1%
2000 / 2001	127,783	6%
2001 / 2002	137,593	8%
2002 / 2003	143,090	4%
2003 / 2004	Not collected	
2004 / 2005	150,225	5%
2005 / 2006	156,753	4%
2006 / 2007	177,275	13%
2007 / 2008	191,647	8%
2008 / 2009	217,400	13%
2009 / 2010	216,750	0%
2010 / 2011	239,576	11%
2011 / 2012	252,934	6%
2012 / 2013	281,622	11%
2013 / 2014	305,984	9%
2014 / 2015	312,946	2%
2015 / 2016	315,070	1%
2016 / 2017	313,236	-1%
2017 / 2018	305,390	-3%
2018 / 2019	322,654	+6%
2019 / 2020	359,846	+12%
2020 / 2021	90,958	-75%
2021 / 2022	238,768	+163%
Last three years (19/20 to 21/22)		-34%
Start of statistics to date		+114%

Rail year (ends March in last year noted)	Entries / exits	Growth / decline
Freshford (2,004th)		
1997 / 1998	18,255	n/a
1998 / 1999	17,182	-6%
1999 / 2000	15,626	-9%
2000 / 2001	19,549	25%
2001 / 2002	19,073	-2%
2002 / 2003	18,757	-2%
2003 / 2004	Not collected	
2004 / 2005	20,711	10%
2005 / 2006	20,779	0%
2006 / 2007	23,448	13%
2007 / 2008	25,552	9%
2008 / 2009	31,604	24%
2009 / 2010	30,796	-3%
2010 / 2011	33,456	9%
2011 / 2012	37,280	11%
2012 / 2013	39,160	5%
2013 / 2014	40,148	3%
2014 / 2015	44,414	11%
2015 / 2016	43,160	-3%
2016 / 2017	45,468	5%
2017 / 2018	44,732	-2%
2018 / 2019	53,368	+19%
2019 / 2020	55,454	+4%
2020 / 2021	13,218	-76%
2021 / 2022	34,112	+158%
Last three years (13/14 to 16/17)		-38%
Start of statistics to date		+87%

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. Neither of these options were used for the B&NES survey (either previously or in this 2023 survey).

In previous years, the questions began with a screening question seeking to focus the questionnaires only on those that live in the B&NES area. This is principally to screen out the large number of tourists whose opinions on licensed vehicles are not relevant to this study which focusses more on day to day usage. With the interviews undertaken in mid-February and with continued reticence of people to stop to be interviewed following the pandemic, it was decided not to screen this time.

The survey was undertaken on Tuesday and Wednesday 14th and 15th February 2023 in the central area of Bath. A wide range of locations were used including locations near the active ranks and around the main shopping areas. In total, 199 interviews were obtained, sufficient to provide a robust indicative view of public attitudes towards the licensed vehicle service experienced. This was more than the 158 of 2020 or the 122 of 2017. This suggests the removal of the screen was helpful in achieving a higher sample size.

However, a check was made to identify the proportion of people who said they lived in the area. 58% said they did. Those that did not provided their postcode information. Many postcodes were just given by one respondent. Whilst there were two from overseas, most were relatively nearby. Of those not directly from B&NES, 7% each were from Trowbridge, Bristol East and Melksham. 5% were from Bristol South West, 4% from Keynsham and 2% each from Devizes, Chippenham, Redland, Weymouth, Crediton, Warmley, Bradford on Avon and Hove. Many of these are within the direct B&NES hinterland and many could be licensed vehicle users. This will be borne in mind as the analysis proceeds.

The interviewed sample saw more females interviewed than the local estimate of 2021 population suggests. 40% (45% in 2020/2017) of those interviewed were male compared to an expected 48% (49%) in the population estimates. The higher sample of females may increase potential licensed vehicle usage in these results.

In terms of age structure, the sample saw more mid-age group than the census estimate, with just 13% (20%) of the lower age group (27%, was 29% in census), 52% (45%) of the mid (compared to 35% (33%)) but a very similar level to that expected for the older group, 36% (same as 2020) compared to 38% (37%). In 2017 it had been the older group that was over-represented with the younger group even further under-represented than this time. Again, this is likely to increase the potential use of licensed vehicles in our responses.

Of those interviewed, all those interviewed told us if they had used a licensed vehicle in the last three months in the B&NES area or not. 4% said they had used hackney carriage only, 14% that they had used both hackney carriage and private hire and 16% that they had used licensed vehicles, but private hire only. This is a total of a third saying they have recently used local licensed vehicles. This is reduced from the 60% who said they had in 2020, which had been very similar to the 62% three years ago. This is a strong reduction in quoted usage.

However, of these, the largest proportion, 18%, said they used them once or twice month, higher usage than the 23% that said they had used them once or twice yearly in 2020 (reduced to 19% this time), followed by 5% (22%) less than once a month but more than twice a year. 5% (13% 2020) said once or twice weekly, although a much higher 47% (17%) said they never used them at all.

Allowing for average usage for each category above, it is estimated that each person makes 0.7 (1.3 in 2020) licensed vehicle trips per month. When the similar question was asked, but focussed on hackney carriages only, the similar estimate is 0.3 (0.5) hackney carriage vehicle trips per person per month, 43% (41% 2020 - remarkably similar) of the total for licensed vehicles in total (see further below). Both values are lower again than in 2017 when the respective levels were 2.2 and 1.2 with proportionate reduction in the share of hackney carriage usage from 55%. This suggests continued overall reduced levels of total licensed vehicle usage, but with the share taken by hackney carriages actually improved this time, albeit marginally.

Almost all interviewees told us how they normally got a licensed vehicle in the B&NES area. 5% said they never used licensed vehicles. A further 7% said other but did not state their supplementary reason, apart from one that said 'google'. 52% (47% 2020) said telephone, none (5%) a freephone and 15% (13%) an app, giving a total of 67% (65%) by potentially non hackney carriage methods. 19% (35%) said rank (reduced again from the 42% of 2017) whilst 2% (1%) - about twice the national average – said they got one by hailing (reduced from 4% in 2017). The total of 22% (36%) directly by hackney carriage is relatively much lower than the 43% (41%) estimate based on the stated frequencies of usage.

A key change since the last survey has seen the major and most established former local company now become part of what is an English national (not international) app, although values above suggest not a great increase in quoted use of apps.

People were then asked to say which companies they used when booking a licensed vehicle by phone. Just 38% this time told us (two thirds last time) us at least one company they phoned (2020 had been the same level as in 2017). As in 2020, just one person gave three companies. 20% named two (28% in 2020) and the remaining 79% a single company.

Since the last survey, the largest company, which itself had long seen two company names under one umbrella, has become part of a large national app-based group. In 2020, that group took 93% of all company mentions with the remainder spread over seven smaller names. For this survey, that group took 85% of all quotes (using all three names but with the app name dominant (64%))(in reality the old names are no longer formally used). Second was a national app with 10%, with the remaining 5% spread between four smaller companies, only one of which had been named in 2020. This means that in 2023, Bath licensed vehicle bookings are 95% to either apps directly or to companies that have an app. This is the highest level of app domination we have seen in any study.

In terms of specific use of hackney carriages, most people provided a response. Just 5% (3% in 2020 and 2017) of these said they could not remember seeing a hackney carriage vehicle in the area, a good response suggesting hackney carriages are distinctive to those interviewed. However, a further 58% (44% in 2020 and 45% in 2017) said they could not remember when they had last used a hackney carriage in the area.

The highest score for actual usage frequencies was 15% (25% in 2020) saying they used them once or twice yearly. However, 3% (8%) did say once or twice weekly, but no-one said they used hackney carriages three times or more per week, as in 2020.

70% (88% in 2020, 89% in 2017) of those interviewed told us at least one rank they were aware of, and if they used it or not. All said if they used the rank or not. 10% (14% 2020) of those giving answers named three locations. 51% (55%) named two and 39% (31%) named just a single location.

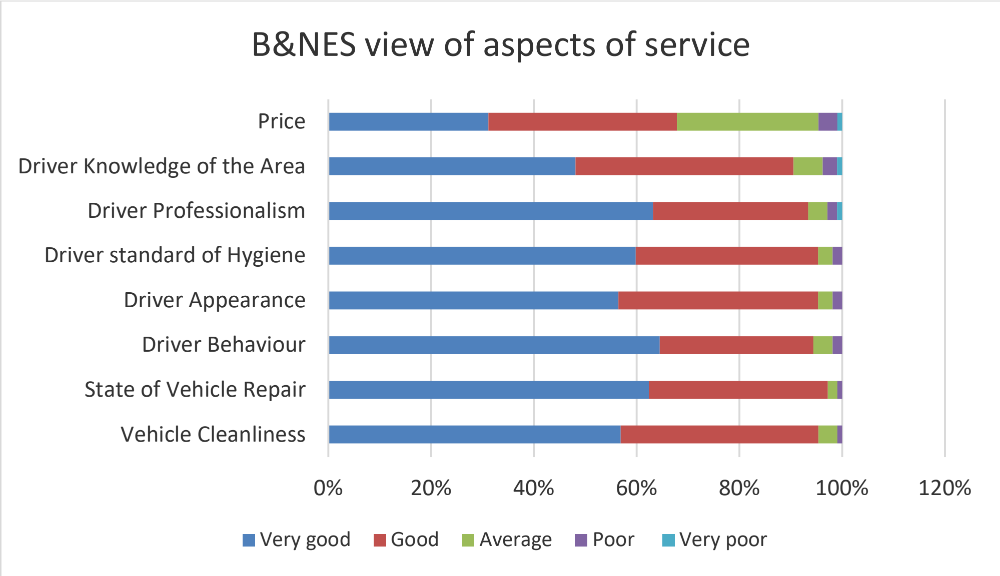
There were two main locations named. For this survey the station was top with 48% (41% in 2020 and 44% 2017), with Orange Grove / Abbey second with 40% (43% 2020 and 2017)

Some places were quoted by people using several different names although the top next location was a private hire office (gaining 3% (7% 2020) in total but with the public using three different names for that location).

The Westgate Buildings rank was mentioned by the public using three other names that totalled some 3% of mentions (possibly 5% in 2020 and 2017). There was one mention of the former rank in Milsom Street (person said they did not use it). Checks on internet photographs show this was last clearly marked in 2014 and the licensing section advised us it was decommissioned as it was never used by passengers, with any hackney carriage usage only being for their personal business.

Of all the mentions made, 43% (47% in 2020 and 52% in 2017) of the mentions were also confirmed as being locations that the person both knew of and used. This shows a continuing trend of reducing knowledge of rank locations and even more so usage of them, although as in 2020 there were a wide range of minor names given although it was hard to identify their link to actual ranks as it had been in 2020.

People were asked to give their views on the last licensed vehicle trip which they made either by hailing or taking a vehicle from a rank, i.e. gaining specific views about use of hackney carriages. Between 53% and 55% of all those interviewed chose to provide answers for these questions.



The overarching response was 'very good' scores across the board, apart from the usual response regarding price. There were only three elements that scored very poor, and in each case this was just 1% of responses. They were for driver professionalism, driver knowledge and price.

Most aspects scored between 1% and 3% as poor, with price gaining 4% of responses 'poor'. Most very good scores ranged from 48% to 64% with driver behaviour scoring the highest followed by driver professionalism, state of vehicle repair and driver standard of hygiene.

Overall this suggest very high standards and experience for users of both hackney carriage and private hire in the B&NES area.

There were a very few comments provided. One said they had a very helpful and friendly lady driver. Others, all single complaints, said the driver complained about the short distance fare, standards had dropped, vehicles were late or expensive, one that a longer route had been taken, and another that their journey had been the most expensive ever. However, these were all single issues and no further details were provided.

A further question was asked identifying things that might encourage people to use hackney carriages or increase their usage of them. The top proportion of responses was 32% for people who said if they were more affordable – exactly the same proportion as in 2020 (41% in 2017). 39% said other and then gave various versions of 'nothing would make me use them or use them more' (13% in 2020). Other shares were very small, starting from 6% for more hackney carriages that could be hailed or obtained at ranks (11% in 2020), 5% saying if they could pay by electronic means and 4% if there were more hackney carriages people could phone for (this element was 9% in 2017 and 15% in 2020).

Most people told us if they, or anyone they knew, needed an adapted licensed vehicle. 82% said they, or someone they knew, did not – exactly the same value as in 2020. This is relatively low compared to other areas, suggesting relatively high potential need for adapted licensed vehicles – with 18% suggesting they need them or know someone that does. Often this value is below 10%. It is also a higher level of need than in 2017 (87% had no need then). In terms of split between wheelchair accessible style and other adaptations, the bulk of response was in favour of WAV, mainly for people they knew.

People were asked questions to identify, using industry standard and court-agreed methods, their level of latent demand for use of hackney carriages in the B&NES area. They were invited to say if they had given up waiting for a hackney carriage either at a rank or by hailing, and if they had, where this had occurred. 86% (75% in 2020) of people responded to this question with just 6% (21% in 2020) saying they had given up waiting at a rank. Of these, there were 7 (10 in 2020) responses at the station and just 3 (11 in 2020) at Orange Grove with one place not an actual rank locations.

This implies latent demand is a factor of 1.05, lower than the 1.15 of 2020. For the council ranks the value is 1.015 and for the station 1.035. (1.08 and 1.07 in 2020, 1.057 and 1.2 in 2017).

These figures are supplemented by all (53% in 2020) of those interviewed telling us that 50% (80% in 2020) of them considered there were enough hackney carriages.

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.

This survey like all others saw very little interest in responding to any request for feedback. Despite many attempts to contact – principally by electronic means as phone response remained impossible to obtain – just one night club responded. They told us their customers and staff used local licensed vehicles. They told us all used their own mobile phones to book although the club was also aware of a rank nearby. They provided the following feedback:

"We get complaints all of the time about taxis. Not taking intox customers… cancelling from the app because they can force the prices up. Not enough hail and ride cabs. No provision for a rank with a controlled marshall. People saying that they don't feel safe getting to a taxi.

We provide a "Here2help" marshall to walk people over to the ranks or to the bus stop and also we have a paramedic on to assist where we can do. BUT... there should be more taxis in my opinion and at a controlled cost. The apps the other day were £28 for a usual £7 run! It was abhorrent!!"

It must be noted that the bulk of the above comment is relating to issues with private hire, booked or app-based services and not hackney carriages, although they did wonder if people might use hackney carriages if more were available, but did not explain if they thought people would make that choice.

6 Trade stakeholder views

The department for Transport Best Practice Guidance (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. B&NES keep in touch with their drivers by text and issued just under 450 texts with the link to the on-line survey. After checking for duplicate responses, of which there did not appear to be any, there were 58 valid responses, some 13%. This was marginally lower than the 16% response from the last survey in 2020 but higher than the previous two surveys that saw 7% and 4% respectively.

The survey was issued in the first week of February 2020, with the survey left open until 20th March 2023.

The present licensed vehicle fleet is made up of 29% (was 23%) zone 1 hackney carriages, 4% (5%) zone 2 hackney carriages and 67% (72%) private hire. All drivers can drive whichever vehicle is appropriate to them. Of the responses, 43% (62%) were private hire and 50% (38%) hackney carriage. This is a good response from all parts of the trade. Often private hire drivers tend to ignore such surveys, so this is a positive result. The private hire response has reduced since the last survey.

Of the responses, 91% were from those who said the licensed vehicle trade was their only or main source of income. There were 3% working part time with no other sources of income, 3% part time with other income sources and 2% (one person) that was not currently working in the licensed vehicle trade and told us they did not plan to return.

General statistics were reviewed for those responding. For the hackney carriage respondents, the average length of service with the B&NES trade was 11 (16 in 2020) years, for private hire this was 11 (11) years. The average was 11 (13) years, a clear reduction this time (compared to the repeated increase for the last two surveys). This suggests several hackney carriage drivers have retired since the last survey. Maximum quoted times of service were 30 and 35 years respectively – unusual in that hackney carriage is usually longer.

For the full sample, the most frequent number of days worked was six (51% (41% 2020, 44% 2017) of respondents), although in 2020 23% said they had not worked in the week previous. This value was the highest for all types of vehicles with hackney carriage 45%, private hire 52% and those driving both 75%. Average days worked were 5.7 for hackney carriage and 5.4 for private hire. Similarly, average hackney carriage working hours were 45 (42) compared to 42 (34) for private hire, and 45.5 (37) for the full sample. This is an increase from the previous survey, reversing the previous trend of reducing hours worked.

91% (86% 2020, 87% 2017) of all those responding owned their own vehicle. This proportion was higher for private hire (96% (88%) compared to 86% (83%) for hackney carriage). Overall, just 7% (14% in 2020 and 20% in 2017) said someone else drove their vehicle, a reducing trend. 9% said they had changed their sharing since COVID, although in B&NES this trend was already in place.

86% of hackney carriage accepted pre-bookings, with private hire 96% and those driving both 67%. The range of how this was done was quite wide but app-based options were highly mentioned as were office bookings and direct customer requests. Many used several methods.

Most of the hackney carriage respondents told us the ranks they used. Many gave multiple responses. The top directly named rank was Bath Spa station with 31% (23% in 2020) of responses. However, 29% (20%) said 'Abbey' with a further 14% (same as 2020) saying Orange Grove making the total for that rank 43% (34% 2020). This continues the trend of these top two ranks being quoted more survey on survey – i.e. a focus towards servicing the main ranks.

7% (14%) said George Street and 7% (13%) Westgate Buildings. None this time (9% in 2020) said 'all'. 10% (4% in 2020) said Kingsmead Square where there is no active rank. One respondent, 2% said Southgate and another said Bath University. None (4% in 2020) said Midsomer Norton.

Drivers told us why they worked particular times. The top reason for hackney carriages was child care or family reasons (27%) – this accounted for 15% for private hire and was third equal for them. Second equal for hackney carriages with 20% was avoiding busy traffic – this was also third equal with 15% for private hire. The other second equal score for hackney carriages was avoiding awkward customers (again 20%), this was first equal for private hire with a score of 23%. The other first equal for private hire was fulfilling contracts. Fourth equal with 17% for hackney carriage was working when there was high demand – this was fifth equal for private hire with a score of 8%. The other two fifth equal scores for private hire were convenience / preference and meeting people from the airport. Convenience and preference were fourth equal for hackney carriages (score 7%) alongside preferring to work days. Lowest scored for hackney carriages, at 3% was working when the fares set were higher.

75% (80% in 2020 and 78% in 2017) felt the limit on hackney carriage vehicle numbers remained correct. This suggests no real change.

For this survey, 43% of all drivers responding gave valid reasons how the limit benefitted the public (23% last time). Of these, 28% (22% in 2020) felt it reduced potential pollution and congestion, 20% equally felt it kept better overall standards (35% 2020) or kept vehicles servicing ranks, 12% said it ensured better viability. 8% (4%) said it meant better local knowledge in the more stable set of drivers. 4% each said it meant better drivers or better service.

In addition to the ones giving clear valid reasons for retaining the limit, two further drivers (3%) simply commented that the limit currently works. Seven (12%) made comments about lack of work. One (1.5%) said that waiting was normal if demand was high. Six (10%) used this question to doubt the value of the limit saying they felt it did not benefit the public but did not say why.

When given opportunity to say how removing the limit might benefit the public, to which 69% of drivers gave an answer, 21 (53% of those answering) drivers took opportunity to doubt that it would, and reiterate need to retain the limit. 16 (40% of those answering) gave valid reasons to remove the limit, mainly saying it meant there would be higher availability to the public, that it would increase overall demand and provide more choice. Three others (7%) either said they did not know or gave answers that were unclear if they were suggesting benefits of delimitation or not.

76% felt there were enough hackney carriages in the area at the present time.

The overall comment about people needing to travel in wheel chairs or travelling with them but transferring, was that drivers never got such customers. The levels of 'never' were 57% rank, 48% booking, 86% contract and 37%, 34% and 89% respectively for transferring. However, 7% said they obtained a daily rank wheelchair passenger, 3% fortnightly, 7% monthly, 3% three monthly and 20% yearly. For bookings, 7% again had daily passengers, 16% had such a passenger weekly, 9% monthly, 2% six monthly, 14% yearly and 5% rarely. For contracts, 10% had daily passengers and 5% yearly.

With reference to people in wheel chairs wishing to transfer, from a rank 3% said weekly, 3% fortnightly, 20% monthly, 10% six monthly, 23% yearly and 3% rarely. For booked transfers 7% said daily, 18% weekly, 20% monthly, 16% yearly and 5% rarely whilst for contracts 6% said daily and 6% yearly.

All these show some, but relatively minor, usage although those transferring seem to provide higher usage.

Other comments were provided of various kinds. All below are the views of the individuals reported as stated, and not the view of the writer of this report nor are they necessarily verified (and in no particular order)(but excluding any comment about the limit, and some drawn from being put on the limit questions pages):

- There is less travel still, no University meetings, much less corporate travel
- too many Bristol and South Gloucester private hire work for an app company in Bath (at least six reported this)
- their focus of operation is Bog Island on Friday and Saturday nights
- the revised layout at Westgate Buildings made the rank there unusable
- like there is one driver type, there should be only one vehicle type (this is not legally possible)
- the private hire roof sign is confusing
- it costs too much to enter the trade
- demand is already well enough met
- charge private vehicles to enter clean air zone
- cannot earn enough
- a WAV operator said they had not had more than 10 WAV users approach them in 15 years
- remember the traffic issues affect supply
- please tell me when you issue more hackney carriage licences as I want one
- please add more hackneys and reduce the plate value from 15-20k to zero

- introduce managed growth
- put up fares
- make card machines mandatory
- replace unmet demand surveys with surveys of how drivers can be assisted more

As is normal for any unmet demand survey, there are several valid comments, several that are hard to verify and several that demonstrate misunderstanding. A key misunderstanding is the possibility of having one vehicle type like there is one driver type – this is not legally possible.

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 arrives 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 whom 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 the time it takes for passengers to board and vehicles to 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 caveat 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 not -zero, then the remaining components of the index come into play. These are the peakiness factor, the seasonality factor, average passenger delay, and the latent demand factor.

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

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

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

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

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

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

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

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

The table below shows each specific element of the index of significance of unmet demand (ISUD) and the values identified in the current and previous surveys for which information is available. All these values shown relate to the review of B&NES ranks undertaken as a snapshot for each year shown.

Element	2023			2020		2017		2014	2011	2008
Ranks included	All	All (full)	Council	All	Council	All	Council	All	All	All
Average wait (mins)	0.35	0.35	0.17	0.10	0.12	0.25	0.12	0.53	0.65	1.01
Peak factor	0.5	0.5	0.5	1.0	1.0	1.0	1.0	0.5	0.5	1.0
% Queues in weekday daytime hours	44.74	32.69	27.27	4.55	5.56	24	6	7.5 – 16.7	0	13
% pass in hours with waiting over 1 minute	10.20	10.20	4.83	1.16	2.22	6.26	0.91	23	34	8
Latent demand	1.05	1.05	1.015	1.15	1.08	1.2	1.057	1.16	n/a	1.31
Seasonal	1.2	1.2	1.2	1.2	1.2	1	1	1	1	1
Overall ISUD index	100.6	73.53	13.18	0.73	1.86	45	0.69	53 – 118	0	138

Note: Overall ISUD index is the product of multiplying each value in the columns by each other. The resulting curve is exponential. When the average wait (average passenger delay) is a minute or more, all other elements are effective in full. The only other factor that can 'dampen' impacts is the peak factor which can halve all results if demand is seen to be 'peaky'.

The initial test excluded one minor rank that sees a small amount of usage but no unmet demand. This result suggested unmet demand that was significant mainly due the levels of off-peak queues. Putting the final rank into the equation meant values of off peak delay were reduced, and the index fell just below the 80 cut-off. However, this information retains the private station rank, which adding extra plates cannot necessarily improve given the further restrictions out of council control applied by the rank owner and operator.

Removing the station rank sees the ISUD index reduce significantly to just over 13, much lower. This implies that the bulk of both off peak and general delay is coming from the station rank, potentially because the number of vehicles able to service that location is doubly limited. This value is the more valid one to use to evaluate the present hackney carriage fleet for B&NES because it represents the locations that the authority are able to influence with addition of more plates if needed.

In 2020, removing the station rank actually improved the overall performance, albeit marginally. Given the number of station permits has remained the same since that time, the explanation for the significantly worsened service to the station rank must lie in some other change such as more of the hackney carriages that have permits undertaking home to school contracts or working for private hire companies undertaking bookings and therefore reducing the level of vehicles servicing this location. The drop in potential earnings from this location through the pandemic and since due to reduced passenger flow from the trains will not have helped with drivers moving to where they can obtain passengers.

Further discussion of the implication of these results follows in context below.

8 Summary, synthesis and study conclusions

This taxi unmet demand survey on behalf of B&NES Council has been undertaken following the guidance of the BPG and other recent case history regarding unmet demand and its significance. This summary draws out the key findings, puts them together and then provides the overall conclusion and recommendations arising from this study.

Background and context

This survey began with appointment on the basis of our August 2022 proposal with an inception on 2 February 2023. All the survey work was undertaken in February and early March 2023. The report was reviewed by the licensing officer during July 2023 on two occasions.

Bath and North East Somerset (B&NES) is a unitary authority with all relevant licensing and transport powers fully under its auspices. However, it has chosen to work within the wider West of England Combined Authority (WECA) in terms of wider policy, including the Joint Local Transport Plan 4 and related documents. The constituent authorities are seeking to be carbon neutral by 2030. Actions are planned to reallocate road space towards sustainable modes and to decarbonise as many remaining vehicles as possible. Specific actions were agreed during the process of BREATHE in regard to licensed vehicles to ensure their contribution to change is a positive one.

A key focus is increasing and transforming connectivity, enabling seamless door to door journeys, especially for those with mobility needs. It is acknowledged that hackney carriage and private hire can improve connectivity at all levels of transport need. They can be a critical part of longer journeys as well as being ideal in providing complex journeys. The policy is aware of developing on-demand services and the opportunities for improving air quality. In essence overall transport policy, nor the quoted role of licensed vehicles within this, has not changed since the last survey.

All this occurs against a background of lower growth in population levels in the years since the last survey.

There has been a limit on the number of hackney carriages vehicles in the Bath central zone since at least 1994, when the new authority was established. Surveys of demand have occurred every three years at least back as far as 2008. These have only covered the central Bath area which equates to the former City boundary, with the zone system established and retained since the new authority was instigated.

In the period since 1994 there have been three plate issues (18, 2004, 15 in 2007 and three after the 2014 survey). For the first time, there are some central zone hackney carriage plates not on issue but with no interest in them being taken up. Compared to this, outer zone hackney carriages are reducing steadily with private hire vehicle numbers more volatile.

All drivers can drive either hackney carriage or private hire vehicles. The pandemic strongly reduced driver numbers and there is no sign as yet of return – with the number of vehicles and drivers now much closer to each other than ever before. Operator numbers have gone against the trend although the latest DfT value seems in error.

Levels of wheelchair accessible vehicles (based on the latest DfT 2023 survey) are 9% within the zone 1 hackney carriage fleet and 4% across the full vehicle fleet, compared to 11% for the national average for all vehicles (but including many fully WAV style hackney carriage fleets). The overall level of provision is towards average but slightly below.

A major change in the operating structure of the industry since the last survey has been the take-over of a large local company and its replacement by a national company.

Furthermore, the overall transport background in the area has seen a successful e-scooter operation begin with estimates that up to 9% of its trips were by those who say they would otherwise have used some form of licensed vehicle, although the demographic suggests the reduction might be steeper for private hire / app-based licensed vehicle trips than perhaps for rank-based trips although there is no detailed data available.

Rank observations

Ranks in February 2023 were essentially the same as in the previous survey. In terms of overall actions observed at each rank, the top two ranks saw 51% and 39% of all activity respectively, with Bath Spa station having the highest followed by the Abbey rank. The four other ranks observed saw significant drops, with only Southgate Street seeing real use (at about a similar level as last time in vehicle movements). Total movements were reduced from the last survey, although groups walking away from ranks were also reduced.

Although there was some private car abuse of ranks, marginally up on the last survey, the dramatic changes were strong increases in abuse at Westgate Buildings and George Street, two ranks that lost patronage heavily in vehicle terms (see below for passenger losses).

Estimates of average weekly demand for all ranks suggest some 6,446 passengers at this time. This is 40% less than in 2020 (which was itself 27% down on the previous). Bath Spa Station rank now provides 59% of estimated weekly passengers (same as in 2020). The Abbey rank is second, but with increased share now (40%), 22% in the previous survey. All other smaller ranks saw significant passenger reductions with the Westgate Buildings rank no longer seeing any passengers, having taken 15% last survey.

As is typical, Friday and Saturday passenger levels are higher than on Thursdays, but not perhaps as much as in other areas where weekday flows tend to be a lot less. Whereas in 2020 there were no hours without passengers, this time there were four such hours (early Friday and early Sunday).

The Saturday peak hour is 3.8 times the average hourly passenger flow with the Friday night peak about two thirds of the Saturday level. Both peaks are in the 22:00 hour on each day, remarkably just as in 2020. Average flows per hour are now 33 Thursday, 47 Friday and 59 Saturday which when divided by the 1.5 average passengers per vehicle is not high demand per vehicle.

For this survey, weekday flows are more dominated by the Station rank whilst the Abbey / Orange Grove rank sees night peaks, but markedly so on the Saturday night. Southgate Street only sees usage late night Fridays and Saturdays.

With respect to average passenger delay, this has almost doubled from 10% to 18% of hours observed. A third of hours that saw delay saw average passenger delay in that hour over a minute. 64% of delay hours were at the Station rank, 28% at the Abbey and 8% at Southgate (although these were all the results of 'thin' demand not passenger volumes).

The sample vehicle activity surveys found a reduced 61% (73% in 2020) of all available hackney carriages observed on the busiest day of the survey. The highest level in any period was 41% (59% in 2020) in the 22:00 to midnight period. Considering the Abbey rank, 51% of the fleet was seen there whilst 34% was observed at the station rank. 16% (up from 7% in 2020) of the fleet were only seen at the station whilst 40% were seen at or near both locations. Plates at the Station seemed to be more active. Very late night activity of vehicles tends to be the lowest with focus of most vehicles on the busiest rank hours as might be expected.

14% of the vehicles observed appeared to be WAV style compared to the 13% actually in the fleet (at the time of survey). The level of actual WAV usage at ranks was very low with just one person at the Abbey and two at the Station ranks during the course of the survey (one more than in 2020). The level of visibly disabled usage (but not wheel chair using) was higher.

Using the national station passenger statistics suggests that about 9% of Bath Spa station passengers leave the station in a hackney carriage from the rank there. Bath has the 73rd highest passenger flows in UK stations, having moved up five places since the last survey, albeit with only 64% of previous flows of passengers.

On street public views

A robust and broadly census comparable set of interviews in the streets of Bath found a third (60% in 2020 and 62% in 2017) saying they had used a local licensed vehicle in the last three months. 4% said they had used hackney carriage only, 14% both hackney carriage and private hire and 16% only private hire.

Frequencies quoted suggest 0.7 (1.3 2020) licensed vehicle trips per person per month compared to 0.3 (0.5) for hackney carriages. This suggests 43% of licensed vehicle trips are by hackney carriage. This compares to 19% saying they normally got licensed vehicles at ranks and 2% hailed. App proportions were slightly higher at 15% compared to 13% last time. Overall phone methods were only marginally higher at 67% compared to 65% in 2020. The biggest loss was no mention this time of free phones (was 5%).

For this survey, the top company mentioned took less mentions, reducing from 93% to 85%, with 10% to a national app suggesting Bath licensed vehicle usage is highly dominated by people using apps.

Whilst a very low percentage could not remember seeing a hackney carriage vehicle in the area (5% now, 3% in the previous two surveys), suggesting very good appreciation and distinctiveness, 58% now (44% 2020, 45% 2017) could not remember when they had last used them.

People mainly knew the two main ranks, with 43% saying they used the location they mentioned.

Responses to questions about the last trip made by licensed vehicles suggested very high standards and appreciation of the service provided.

Price was a key determinant that might increase hackney carriage usage.

The level of need for adapted vehicles appeared to have increased but mainly for WAV style vehicles.

Latent demand was lower than in 2020 (1.05 compared to 1.15). The value was 1.015 for council ranks and 1.035 for the station. 50% (80% in 2020) felt there were sufficient hackney carriages now.

Key stakeholder views
Only one key stakeholder made any comments, basically issues with private hire services and principally issues with app surge charging.

Trade views
The trade survey was issued by the council using their proven method to contact all drivers. It was issued in the first week of February with reminders. 13% (16% 202) of drivers responded.

43% (62% 2020) of response was from those saying they drove private hire, and half from hackney carriages. One person responded saying they no longer worked in the industry and did not plan to return. 91% said the trade was their main or only source of income with 6% part time workers.

Average length of service was lower than at the last survey with suggestion there had been many retire. Hackney carriage average days worked were 5.7 with 5.4 for private hire, with hours being 45 (42) and 42 (34) respectively, suggesting longer working hours now.

A higher 91% (86% 2020) of respondents to the previous survey owned their own vehicle. A reduced level of 7% (14% 2020 and 20% 2017) said someone else also drove their vehicle.

31% (23% 2020) of drivers used Bath Spa station rank with 29% (20%) saying the Abbey rank and an additional 14% Orange Grove (making 43% (34% 2020) in total for that rank). George Street and Westgate Buildings obtained 7% (14%) and 7% (13%) respectively.

It was clear that drivers now focussed more on quality of life than on working, with avoiding busy traffic and awkward customers joint second with 20% each from hackney carriage respondents.

A marginally reduced 75% (80% in 2020) felt the limit remained correct. Those responding gave the main benefit of the limit that it reduced pollution and congestion (28%, 22% 2020), 20% each said better standards or ensured vehicles serviced ranks.

Formal evaluation of significance of unmet demand

Information from the rank observations and the on-street surveys were used to provide estimates of the various components of the index of significance of unmet demand.

Initial tests using all data found the level of unmet demand was just below the level of 80 that is counted as significant. However, taking out the private station observations significantly reduced the level to 13. It is interesting to note that a similar test in 2020 found performance at the station was better than that to the council ranks, suggesting it is not the supplementary limit but the reduced level of activity that is leading to this change.

Synthesis

The area has seen the continued trend towards reducing levels of demand for hackney carriages at ranks. This is despite people being happy with service they receive from hackney carriages, and from people being aware that they exist. The principal change appears to be the impact of both national and local apps providing a more accessible service in that people do not have to go to ranks to obtain vehicles. This conclusion from 2020 remains the same apart from some evidence that the issue of app surge pricing is now beginning to tarnish their growth in usage.

There is a clear focus of both passengers and vehicles to the two main ranks, with only one other rank seeing a little usage. It is interesting to note that increased levels of passenger delay are occurring alongside significantly reduced levels of latent demand – suggesting people have more confidence to wait now than in 2020.

Conclusions

The lack of any unmet demand which is significant means that the policy retaining a limit on hackney carriage vehicle numbers can be retained. Further, there is no evidence of any need for further plates and the current level can be retained. The fact there are spare plates than no-one appears to wish to take up confirms this.

The hackney carriage rank at the station does allow 9% of passengers to leave by that means. This is not trivial but the worsening levels of service at the station are a concern given how important this demand remains to the trade. However, the overall very low levels of demand mean that survival by service of ranks alone is impossible. Conversely, bookings, app-work and contracts provide stability and more guaranteed work.

9 Recommendations

On the basis of the evidence gathered in this taxi unmet demand survey for the Bath and North East Somerset central Bath zone, 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 licensing area.

This permits the committee to determine to retain the limit and be able to defend this if required. The level of vehicles is also sufficient to meet demand and there is no need to add any further plates at this time. It may be worth considering how the spare plates might be encouraged into use, although there could also be benefit of extinguishing these given the lack of demand for them and the very low levels of demand for hackney carriages at ranks or by hailing.

Retention of the limit requires repeat of this survey with fresh surveys no later than three years from the date of this snapshot.