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THE DATA COLLECTION SPECIALISTS

Bath and North East Somerset Council Taxi unmet demand study 2014 Final Report

April 2015

Contents

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Executive summary

CTS Traffic and Transportation were appointed by Bath and North East Somerset Council (B&NES) to undertake their Taxi Unmet Demand Study 2014 on 6th March 2014. This report presents the results of all investigations undertaken to provide a database of robust information on which a decision can be taken by councillors in regard to the hackney carriage City zone vehicle limitation policy. All research was undertaken in line with the current Department for Transport Best Practice Guidance (April 2010) and taking advantage of the extensive research undertaken by the Law Commission in their recent review of licensing. The report will now be taken through appropriate channels within the Council debating structure.

B&NES is a unitary authority with full highway and transport powers. Its background transport policy seeks that taxis and private hire vehicles should complement and reinforce other public transport services. Licensed vehicle policy and conditions were recently reviewed and ratified in January 2014. Any wheel chair accessible vehicle (WAV) has to be purpose built and such licences can only be replaced with the same vehicle or to a higher standard. The number of vehicles in the Bath city zone has long been limited using the Council powers under the 1985 Transport Act, with regular testing that the limit is at the appropriate level. This study is the latest of these tests.

The city zone currently has 122 hackney carriage vehicle licences supplemented by 31 outer area hackney carriages and 334 all area private hire vehicles (neither of these last two numbers are limited). 627 drivers can drive any of these vehicles with 95 operators in place. Current private hire numbers are presently at their lowest level since 2007 and have been falling since the peak of 2010. City zone licences were last increased in 2008 after the study of that year identified significant unmet demand. Fares appear high although similar to many other tourist areas.

127 hours of rank observation were undertaken – very similar to the level in both previous studies. Just one person was observed using a wheel chair to access a hackney carriage in the area at ranks. The Abbey and the private Bath Spa station rank still see the same proportion of passenger movements as identified in both the previous studies. Between 2011 and 2014 every rank – including lesser used ones – has seen significant passenger growth. This may be related to the new shopping centre opened fully since 2008 although rail passenger traffic has also grown 20% in a similar period. Two new ranks have successfully been introduced. Total annual usage of hackney carriages from ranks and hailing is 915,798 passengers, although this excludes any bookings made through the high proportion operating on radio circuits. The marshal data was used to confirm our survey was at a typical time and to identify growth in the peak levels of passengers.

Less people claimed they had used a hackney carriage in the last three months compared to 2011 (57% now, 90% in 2011), and a quarter confirmed they had used them less compared to in 2011. Licensed vehicles tend to see 2.7 person trips per month whilst for hackney carriages the level is 0.5. 62% of people obtained licensed vehicles by phone methods with the remainder using ranks. Few companies were mentioned overall by those who phoned suggesting relatively low levels of competition between companies in the area. People knew the ranks well but the only need for improvement is in signing of the lesser used locations (where many asked ranks should be introduced).

About one in five people had issues with the service, with a focus on delay getting a licensed vehicle, rank position and driver issues. People would use them more were they cheaper – a usual reaction to these questions, but also if there were an increased number available by phone (principally private hire) and at ranks, . Latent demand was 16% with equal amounts having given up waiting at the Abbey and private rail station ranks.

Stakeholder consultation identified a lot of usage of private hire vehicles through freephones but also several key stakeholders whose customers chose to use ranks. The police view was that the marshals had improved the service at night and that numbers were about balanced at present. The only council department feedback was preference for more WAV style vehicles for their contracts.

A fair response was received from the trade –with average driver experience 10 years and a typical week 50 hours. Overall stated coverage of hours is very good. 81% - including several private hire drivers – said the limit remained relevant and gave reasons why they felt passengers benefitted with concerns that more vehicles would reduce the funds available for maintenance as well as increasing over-ranking that did occur at some periods.

Were the Equality Act ever to be enacted there would be a shortage of WAV in the city hackney carriage fleet. However, there is little that can be done about this at the present time although adding more licences would increase the level although there was little public or stakeholder request other than from the Council transport section for more vehicles.

A review of the Best Practice Guidance found evidence that there is good reason to retain the limit on city zone vehicle numbers – focussing on issues of congestion as well as ensuring passengers benefitted from the current stability the limit brings.

However, on balance, and with two potential values of the industry standard index of significance of unmet demand (ISUD) around the cut-off limit, the technical recommendation of the study is for addition of three extra vehicle licences whilst retaining the limit policy. The need for more licences appears to have arisen from significant growth in passenger numbers since 2011, which was clearly a low point in demand. There may be an element of more hackney carriages having moved to work on private hire circuits as well as an impact of increasing traffic congestion reducing the ability of the hackney carriage fleet to meet passenger need. However, it is important that the Council reacts to meeting passenger need in a tangible way since they have no ability or power to change these other influences.

Even with the extra licences, there may remain a shortage of private hire vehicles available for phone bookings which the market may not currently be providing. This is not related to the hackney carriage Bath zone limit although it can provide similar symptoms to those who generally talk about ‘taxis’ rather than private hire and hackney carriage specifically.

1. Introduction

Bath and North East Somerset Council (B&NES) is responsible for the licensing of hackney carriage and private hire vehicles operating within the council area. The date of the start of a limit on vehicle numbers is not formally known, but it has been in place since at least 1994 when DfT data first began to be collected.

Study timetable

B&NES appointed CTS Traffic and Transportation on 6th March 2014 to undertake this taxi unmet demand study 2014 in line with our quotation dated 12th February 2014.

The review was carried out between March and December 2014, with pedestrian survey work undertaken in May 2014. Licensed vehicle drivers were consulted by a letter sent out during March 2014, with other stakeholder consultation between March and December. To preserve the maximum temporal value of the survey, and ensure results as consistent as practicable, rank surveys were undertaken in October 2014 once the two university sites had become active again after the summer break. A Draft Final report was submitted and this was reviewed in mid-April 2015 to identify any factual or missing issues. The Final Report will be taken through the appropriate reporting procedures within the Council debating structure – presentation to the Council being currently due on 2nd June 2015.

National background and definitions

At the present time, hackney carriage and private hire licensing is carried out under the Town Police Clauses Act 1847 (as amended by various further legislation including the Transport Act 1985, especially Section 16) in regard to hackney carriages and the Local Government (Miscellaneous Provisions) Act 1976 with reference to private hire vehicles. A number of modifications have been made within more recent legislation and through case law.

The issue of limits on hackney carriage vehicle licences (and other potentially restrictive practices) were considered by the Office of Fair Trading (OfT) (and latterly the House of Commons Select Committee on Transport). The Department for Transport most recently published Best Practice Guidance in April 2010 to cover a number of more recent issues and take on board both the recommendations of the OfT and House of Commons Select Committee (HoC SC). More recently a further HoC SC has led to the Law Commission (LC) taking on a wide ranging review of vehicle licensing law to be completed over the next few years. The consultation document from the LC was released in mid-May 2012 and their final recommendations published on 23rd May 2014.

The final LC document was issued on 23rd May 2014. This did not find time to become Law before the next election, although the Government must make an outline statement within six months and provide detailed comment within a year (neither of which had been received by the time of writing of this report).

The LC Report includes 84 recommendations (specific recommendation numbers in brackets below from Report) including:

- Retaining the two-tier system (1)
- A statutory definition of pre-booking (3) and a new offence of anyone other than a locally licensed taxi driver accepting a booking 'there and then' (10)
- That the term "hackney carriage" should be replaced in legislation with the word "taxi" (4)
- New duty on taxi drivers to stop in specified circumstances if so determined by the local licensing authority (12)
- Each licensing authority under a duty to consult on the need to alter rank provision, not exceeding every three years (13)
- Introduction of national standards for taxi and private hire services (30)
- Licensing authorities retain power to set local taxi standards over and above national standards (46)
- A more flexible power to introduce and remove taxi licensing zones (57)
- Licensing authorities continue to have power to limit the number of taxi vehicles licensed in their area (58)
- Subject to a statutory public interest test with how this statutory test should be applied determined by the Secretary of State (59)
- Reviewed every three years and subject to local consultation (60)
- Mandatory disability awareness training for all drivers (62)
- An accessibility review at three year intervals (65)

Other recommendations are included of less relevance to this current report.

The Deregulation Bill, currently awaiting enacting, originally contained three clauses impacting on taxi licensing. These cover unlicensed relatives being able to drive private hire vehicles (now dropped), operators being able to transfer work across borders and length of driver and operator licences. An opportunity was also given for trade representatives to identify conditions of licence that were felt to be unduly restrictive. None of these really impact on the issue of unmet demand directly but could have some impacts on operations which might move demand from hackney carriages towards private hire more than the current situation might.

At the present time, each licensing authority in England supervises the operations of two different kinds of locally licensed vehicle. Firstly, all vehicles able to carry nine or more passengers are dealt with under national public service vehicle licensing and licensing authorities only have jurisdiction over those carrying eight or less passengers. These vehicles are further subdivided into:

- Hackney carriage vehicles (sometimes referred to as 'taxis' in legislation), which alone are able to wait at ranks and pick up people in the street (ply for hire). To operate such a vehicle also requires a driver to be licensed to drive within the area the vehicle is licensed to operate
- Private hire vehicles, which can only be booked through an operating centre and who, otherwise, are not insured for their passengers (often also known as 'taxis' by the public). To operate such a vehicle requires a vehicle and driver licence, and there must also be an affiliation to an operator. Such vehicles can only transport passengers who have made bookings via this operator.

For the sake of clarity, this report will refer to 'licensed vehicles' when meaning hackney carriage and private hire collectively, and to the specific type when referencing either specific type of vehicle. The term 'taxi' will be avoided as far as possible, although it has to be used in its colloquial form when dealing with the public, few of whom are aware of the detailed differences.

There is a further current issue that does impact on demand – the fact that many hackney carriages once properly licensed in an area with a driver then undertake private hire work in other licensing areas, often many miles from their home base. Such vehicles can have cost base advantages and can appear to be available for immediate hire when they are not in fact legally able to do so (eg with stickers saying 'this vehicle can be hired immediately', which only applies within their licensing area).

Review aims and objectives

Bath and North East Somerset Council is seeking a review of their current policy towards hackney carriage quantity control in line with current Department for Transport (DfT) Best Practice guidance as published in April 2010. Further background information about previous policy is contained in Chapter 2 to set the context of the current situation.

The "Best Practice Guidance" paragraph 47 states: "Most licensing authorities do not impose quantity restrictions the Department regards that as best practice. Where restrictions are imposed, the Department would urge that the matter should be regularly reconsidered…." Recent information suggests that some 75% of licensing authorities in England and Wales either have never limited numbers, or have removed their limit since the OfT published its results.

Around 90 authorities currently retain a limit – although a small number have over recent years returned the limit on vehicle licences (notably including Sheffield, Birmingham and Coventry, but also including Slough, Crawley, Derbyshire Dales, Wirral, Watford, Chesterfield, Milton Keynes, Cambridge and most recently Bristol).

The study brief states "The Council are looking for this work to be carried out and completed by the end of December 2014. The final report should be able to specify whether or not the Council can continue to defend its limitation policy and should answer all the questions raised in the DfT's 2010 Best Practice Guidance. If the report does support the continuation of a limitation policy, then there should be evidence that the quantity controls do not:

- Reduce the availability of taxis;
- Increase waiting times for consumers;
- Reduce choice and safety for consumers

In addition, the report should answer the following questions:-

- Are there special circumstances which justify the retention of the policy?
- How does the policy benefit consumers?
- How does the policy benefit the trade?
- How does the policy fit in with the DfT's guidance to local authorities on the provisions in the Equality Act 2010.

Our research focusses on:
- customer need and expectation
- the existence and significance of unmet demand
- service quality
- safety
- vehicle types
- vehicle designs
- accessibility

Target groups include:
- customers
- potential customers
- individuals
- groups
- organisations on whom the hackney carriage service impacts

Methodology
In order to meet Bath and North East Somerset Council's objectives, the following methodology was adopted:

- Review of relevant policies, standards etc: to understand the authority's aspirations for meeting travel needs and social inclusion and provide context to determining overall demand for travel and how this should be met;

- Extensive rank observations and audits of all the ranks in the Authority, including monitoring passengers' waiting time, any illegal plying for hire, use of Hackney Carriages by wheelchair users and rank audits;

- On street interviews: a survey of 201 representative people on street to obtain information about their understanding of the sector, their last taxi journey, their overall levels of taxi use, about quality and barriers to use;

- Consultation: including consultation with all relevant stakeholders – the local authorities, police, trade associations, all drivers, mobility impaired, specific user groups, businesses, and other major generators of taxi trips

- Benchmarking against other authorities: to provide a useful comparison as to the quantity of taxis and private hire vehicles.

In essence, the methodology used follows similar principles to all surveys undertaken by CTS together with all developments of methodology more recently applied to our surveys, particularly including guidance from both the 2004 DfT letter and their 2010 Best Practice Guidance (which includes the 2004 guidance as an appendix), and including the latest knowledge arising from the Law Commission Review and the current status of the Equality Act.

Report structure
This Report provides the following further chapters:

- Chapter 2 – current background to taxi licensing statistics and policy
- Chapter 3 – results from the rank surveys
- Chapter 4 – results from the surveys undertaken with the public
- Chapter 5 – up to date stakeholder consultation
- Chapter 6 – results from consultation with the taxi licensing trade
- Chapter 7 – consideration of the responses to BPG paragraph 47 and Annex A questions
- Chapter 8 – a review of options relating to the Equality Act
- Chapter 9 – summary and conclusions of this review
- Chapter 10 –recommendations for policy arising from this review.

2. Background to taxi licensing in Bath and North East Somerset

The Bath and North East Somerset Council area

Bath and North East Somerset Council (B&NES) is a unitary authority in the former Avon county area of South West England. Interim data from the 2011 census projected suggests the current 2014 population for B&NES is 180,124. B&NES was created on 1 April 1996 and still retains a two zone system for hackney carriage licensing, the Bath zone of which retains a limit on hackney carriage vehicles numbers.

Bath lies on the A4 which runs between Bristol and London, but some way south of the M4 motorway route which now provides the main London to Bristol link. B&NES itself covers a large area including significant rural areas – much of which is green belt land. Other large settlements include Keynsham, Midsomer Norton, Radstock, Westfield and the Chew Valley, all of which are outside the Bath City zone. A large road network links the various parts of the area.

In public transport terms, Bath lies on the Great Western main line between Bristol and London Paddington, and also on the route to Trowbridge and Salisbury. The rail service from Bristol is very frequent and there are local services also calling at Keynsham, Oldfield Park and Freshford, albeit at less frequent intervals. Bath Spa sees between four and six trains per hour to and from Bristol. A network of local and national bus services radiate from Bath, with their main terminus next to Bath Spa railway station, but at the far end of the central area (which has expanded over the last decade).

B&NES has held regular surveys for a number of years with the last survey in 2011 and the previous one to that in 2008.

In terms of rank provision, all ranks are provided by B&NES apart from the Bath Spa station rank which requires a separate permit from the rail operating company and their agents.

Background Council policy

B&NES, being a unitary authority, has all highway and transport policy powers under its control. Transport Policy is summarised in the current Local Transport Plan (LTP). The LTP applicable to B&NES covers the four local councils of Bristol City, North Somerset, South Gloucestershire and B&NES. It seeks a vision of an affordable, low carbon, accessible, integrated, efficient and reliable transport network through which the councils seek to achieve a more competitive and better connected, more active and healthy community. The plan covers 2011 up to 2026 and underwent a refresh in 2013.

Taxis and private hire vehicles have a specific section in the refresh document (Public Transport Supplementary Document, paragraph 1.10). This states: "Our strategy is for taxis and private hire vehicles to complement and reinforce other public transport services. We intend to focus on three main areas:

Infrastructure and information improvements
TPH1 We will continue to review the need for improvements to the location and design of taxi ranks, and well as the delivery of information to passengers.

Licensing controls and working with operators
TPH2 We will work in partnership with organisations to discuss infrastructure, licensing, driver training and other issues of common interest, placing a high priority on public safety. We will also seek the upgrading of vehicle fleets to reduce emissions.

Increasing role as part of integrated transport strategy
TPH3 We will seek ways for taxis and private hire vehicles to play as wide as possible a role in the public transport system, integrating with other modes and areas of travel demand as appropriate."

Policy of restricting hackney carriage vehicle licences
B&NES has a power to restrict the number of hackney carriage vehicle licences it grants when it is satisfied there is no unmet demand for the services of hackney carriages which is deemed to be significant. This power has been in this format since the introduction of the 1985 Transport Act, Section 16 (before which the power to limit was unfettered).

At the present time, overall government taxi policy is under review by the Law Commission (LC) (see Chapter 1, page 1 for more detail). The current status is that the LC recommended that councils are able to retain the option of limiting their number of hackney carriage vehicles, although any change will have to be agreed by Government and then taken through any appropriate legal process. Formal Government encouragement remains towards the minimisation of restrictions, including limit policies.

B&NES last commissioned for an unmet demand survey to be completed in 2011. The results from this were that there was no significant unmet demand at that time and that the numbers for HCV's should remain the same.

This Report is undertaken within the context of these requirements. It also cross references with previous survey data where comparison is possible.

At the present time, any WAV added to the fleet needs to be purpose built and cater for the full range of disabilities, ambulant, auditory and visual. All are subject to a special condition that any replacement vehicles are of the same or higher standard.

Overall hackney carriage and private hire policy and conditions were reviewed and ratified in January 2014 and are not due for review for some while.

Background statistics

Information was obtained to demonstrate the current make-up of the licensed vehicle fleet in the B&NES area, including current vehicle trends. The table below shows the historic level of vehicle numbers in this area including the split between the two zones where this information is known.

	Total hackney carriage vehicles (%WAV)	No of limited zone HCV (%WAV)	Private hire vehicles (%WAV)	Total licensed vehicle fleet	Driver numbers				Operators
					hcd	Phd	Dual	Total	
No formal DfT date for introduction of limit, but in place when statistics began 1994 B&NES formed of previous authorities of Bath City and Wansdyke when Avon County abolished in 1996. Formal statistics do not differentiate between numbers in the two zones.									
1994	96	89	unknown	n/k	373 (360 +13)	n/k	n/k	n/k	n/k
1997	123 (16)	89	178	301	0	0	478	478	n/k
1999	130 (8)	89	200	330	0	0	456	456	56
2001	117	89	212	329	0	0	525	525	36
2004	148 (11)	89	248	396	0	0	505	505	56
2005	131	107	260	391	0	0	516	516	60
2007	163 (15)	107	273	436	0	0	585	585	65
2009	153	122	367	520	0	0	654	654	95
2010 NPHA	171 (16)	122	372	543	Not collected				
2011	162	122	333	495	0	0	678	678	59
2012 NPHA	171 (11)	122	348	519	Not collected				
2013	175 (11)	122	347 (3)	522	0	0	642	642	85
2014 NPHA	161 (12)	122	337 (0)	498	Not collected				
2014 (Co, Brief)	153 (13)	122 (15)	334 (6)	487	0	0	627	627	95

Note: DfT statistics used from 1994 to 2009, 2011 and 2013.
National Private Hire Association survey for 2010 / 2012/ 2014.
Council statistics for time of survey (October 2014)

Since 1994 when DfT statistics were first published, Bath city zone hackney carriage numbers have increased from 89 to the current level of 122, some 37% growth. This occurred with two releases of licences, 18 in 2005 and 15 in 2008.

For the whole area, total hackney carriage vehicle numbers have increased 59% - suggesting the limit may have restrained background levels of growth although this also needs to be seen in the light of changes in private hire vehicle numbers discussed below.

From 1997 to the council brief figures, private hire numbers have increased by 88%, although numbers have fallen from the peak of 372 reported in 2010 (which was a more than doubling of the level). Current private hire vehicle numbers are at their lowest level since 2007 at which point it appears that all fleets grew alongside the issue of more City zone licences.

Overall licensed vehicle numbers in B&NES are 62% higher than in 1997 although again the maximum growth in the total fleet saw 80% growth to the 2010 high of 543 vehicles. The current overall fleet level is now some 10% lower than this peak.

B&NES has long had licensed vehicle drivers able to drive either hackney carriage or private hire with no distinction between them (in fact the formal statistics never show any other than dual licences). Current driver numbers are 31% higher than in 1997, although about 8% below the peak reached in 2011 of some 678.

In terms of operators, there has been a large increase between 2007 and 2009, mainly arising (as in other authorities) from changes in legislation particularly regarding contracts. However, most of the additional operators are those which are less likely to be public facing (further discussion of this occurs below). There has been a reasonable increase in operator numbers even between 2013 and December 2014.

Comparative information to other authorities

The Table below compares recent licensed vehicle numbers for other authorities in the former Avon county area, adding other similar areas mainly with significant tourist inputs.

The table is listed with the lowest provision of hackney carriages (hcv) per thousand of population at the top of the table within each of the two groups of the local Avon councils and the other areas.

Area	Popn (2014 000)	No of HCV (% WAV)	HCV per 1000 popn	No of PHV (% WAV)	PHV per 1000 popn	Total veh	Total veh per 1000 popn
North Somerset	212	129 (3)	0.6	443 (2)	2.1	572	2.7
Bath and North East Somerset (L)	***180***	***161 (13-15)***	***0.9***	***337 (6)***	***1.9***	***498***	***2.8***
South Gloucestershire	272	271 (7)	1.0	126 (6)	0.5	397	1.5
Bristol (D)	444	750 (100)	1.7	923 (0)	2.1	1673	3.8
Other areas:							
Tunbridge Wells (L)	*119*	*97 (19)*	*0.8*	*126 (2)*	*1.1*	*223*	*1.9*
Scarborough (L)	*109*	*105 (12)*	*1.0*	*211 (9)*	*1.9*	*316*	*2.9*
Warwick (Leamington Spa)	*141*	*194 (68)*	*1.4*	*360 (7)*	*2.6*	*554*	*4.0*
Chesterfield (R)	*105*	*157 (77)*	*1.5*	*349 (9)*	*3.3*	*506*	*4.8*
Cheltenham	*118*	*202 (8)*	*1.7*	*216 (0)*	*1.8*	*418*	*3.5*
Average (four local)	*277*	*328 (30)*	*1.0*	*457 (2)*	*1.6*	*785*	*2.7*
Average (all above)	189	230 (34)	1.2	343 (4)	1.9	573	3.1
England average (excl London)		***n/a(42)***	***1.1***	***n/a(3)***	***2.2***	***n/a***	***3.3***

Note: Population values are 2014 estimates from the 2011 new census in thousands. Hackney carriage vehicle (HCV) and private hire vehicle (PHV) numbers are from NPHA 2014 survey WAV = wheelchair accessible vehicle L = limits retained on vehicle numbers, R=limit returned after period of no limit. D=Originally had limit but removed some while ago.

In terms of hackney carriage vehicles (albeit for both zones), B&NES provision is just less than the average for the four former Avon authorities and slightly further less than the English average excluding London. Non-regulated North Somerset has much less hackneys per thousand population whilst the largest provision is in Bristol which removed its limit some while ago but which has a strict colour policy more recently applied. The two limited other tourist areas of Tunbridge Wells and Scarborough have levels very similar to B&NES (and both have recently reviewed their levels and found them to remain appropriate).

Private hire vehicle levels are also just below the English average but well above the Avon level, and equal to the average for the set of authorities being compared. This results in a similar response for the overall licensed vehicle level – with B&NES only being beaten by Bristol within Avon and being very similar to equally restricted Scarborough, though much less than either Warwick or Chesterfield (the latter town having returned its limit some four years ago).

Overall, the level of hackney carriage and private hire is reasonable in B&NES and though clearly restrained by the limit is not too severely restrained compared to other areas, some of which have no limit.

Vehicle Accessibility

At the present time, we estimate there are 18 wheel chair accessible vehicles in the City fleet and about two in the rural fleet. This means there are currently 15% of the city zone wheel chair accessible and 13% of the total fleet (based on our analysis of the May 2014 vehicle fleet). From a review of vehicles there could be up to 6% of the private hire fleet which may be wheel chair accessible. At the present time any new licences which were introduced would have to be fully wheel chair accessible.

The average English percentage of wheel chair accessible vehicles excluding London (but including other 100% WAV fleets) is 42%. Within Avon, B&NES has the highest level apart from Bristol which is fully WAV. The level is similar to that for both Scarborough (12%) and Tunbridge Wells (19%) but still less than the potential 35% which was being suggested by those considering the Equality Act implementation (although it is unclear how this will now proceed). The figures, however, suggest B&NES is in a reasonable position compared to other similar authorities and to the area, apart from the issue that Bath is a City and many cities tend to have fully WAV style fleets (with Bradford most recently joining the fully WAV (or almost fully WAV) fleet status).

Driver ratios

At the present time, there are 627 drivers for 487 vehicles. This driver ratio of 1.29 suggests some possible double shifting of vehicles. It is not possible to compare the values for hackney carriage and private hire separately.

Fleet ownership structure

There are 95 registered private hire operators in the B&NES licensing authority at the time of this survey. We understand that one large private hire operator dominates most of the public facing vehicles and that there are quite a few executive or airport style operators although we have not undertaken a detailed review at this time.

Fares

The table below summarises Bath and North East Somerset Borough Council hackney carriage fares, as last set:

Period Applicable	Monday to Saturday (except public holidays) 06:01 hrs to 20:00 hrs	Monday to Saturday (except public holidays) 20:01 hrs to 24:00 hrs Sundays 06:01 hrs to 24:00 hrs	Daily (except public holidays) 00:01 hrs to 06:00 hrs	Public holidays and Easter Sunday, Xmas Eve, New Year's Eve (except New Year's Day, Christmas Day and Boxing Day) 00:01 hrs to 24:00 hrs	New Year's Day, Christmas Day & Boxing Day 00:01 hrs to 24:00 hrs
Tariff Rate	1	2	3	4	5
Initial distance 340 yards (approx. 311 meters) or initial time of 1 minute 38 seconds or a combination of both	£2.60	£3.10	£3.60	£3.60	£4.80
Each additional 168 yards (approx. 154 meters)	£0.20	£0.20	£0.20	£0.30	£0.40
Or each additional minute of waiting time or a combination of both	£0.30	£0.30	£0.30	£0.30	£0.30
Until the fare reaches 5 miles then					
Each additional 138 yards (approx. 126 meters) or each additional	£0.20	£0.20	£0.20		
Or each additional minute of waiting time or a combination of both	£0.30	£0.30	£0.30	£0.30	£0.30
Additional charges: Passengers over initial 2 persons £0-50 Each large item of luggage £0-20 All hackney carriage fares are clock-calendar controlled. All charges shown inclusive of VAT where applicable					

Dogs – for every dog carried (except assistance dogs) 50p Children – for the purpose of charging two children under the age of 12 shall be regarded as one person, and children under the age of three shall not be reckoned Fouling charge – for each fouling of the interior of the vehicle eg by vomiting, urinating, defecating or spilling food or drink a charge at the drivers discretion of up to £100 Wheelchairs free of charge Credit/debit card 10% surcharge to a maximum of £1-00					
PHTM calculations for a 2 mile journey T1 (Nov 2014):					
Bath and North East Somerset		£6-40			35=
National		£5-62			
South West		£6-15	Avon av	£6-18	
Group average		£5-97			

The current Bath and North East Somerset fare of £6-40 (as shown for 2014 on the B&NES web) is 14% higher than the national average, 7% higher than the wider group and 4% higher than the Avon group comparisons. Overall, the fare is 35^{th} equal where the highest fare is 1^{st} and the lowest 365^{th} (UK comparison including Scotland and Channel Islands)(NPHA November 2014 source). 19 other authorities, including another Avon authority, have the same fare.

Within Avon, Bath and South Gloucestershire share the same highest fare with Bristol marginally lower and North Somerset the lowest. Apart from Tunbridge Wells, which is marginally higher, all fares in the group comparison are lower than those for B&NES.

Overall, this level of fare seems high although most tourist locations appear to be above average, particularly those in the South of England.

3. Results from rank surveys

The Table below shows the result of our review of the ranks available in the B&NES licensing area. Since the 2011 survey the Southgate Street rank has been added and is seeing trade developing – with more new shopping coming on stream in that area – and the Queen Square rank has also been added. Milsom Street has not been used was removed during 2014, as was South Parade (which was near a private hire booking office). We were advised that Henry Street is not used either (it was surveyed in 2011 but found unused).

During our research we did not find evidence of any other ranks within the B&NES area and understand our rank coverage is therefore comprehensive as required by the Department for Transport's Best Practice Guidance on taxi and private hire licensing (BPG). The rank at Bath Spa station is a private rank administered by an agent on behalf of the rail company, First Great Western, and requires a supplementary permit the cost and conditions of which are beyond the control of the B&NES authority.

Rank / operating hours	**Spaces** (approx)	**Comments**
24-hour Ranks		
Abbey (Orange Grove)	7	Main rank near to Abbey
Westgate Buildings	4	Rank mainly used in evenings but available all day
Walcot Street	3	
George Street	3	
Southgate Street	3	Operates 21:45 to 06:00, bus stop in daytime, near to recent shopping development and added in 2013.
Queen Square	2	Added in 2013
Milsom Street		Removed 2014
Henry Street		Not used in 2011 and remains unused
South Parade		Removed 2014. Always near a private hire office and never recently used by the public as rank.
Private Rank		
Bath Spa Station	20	Reduced in size and rebuilt since 2011 but administered for First Great Western with supplementary permit / charge.

Surveys were proposed during the tender stage of the project (as informed by the previous survey), and were modified at the inception meeting to take account of current expectation of times of use of ranks and informal rank locations. The proposed level of rank observations was retained at 130, compared to 140 in 2011 (apart from 16 at informal locations), with some 48 of the 2011 hours at ranks found to be unused at that time. The 2008 survey included 120 hours. Both previous surveys were undertaken around October / November with the 2008 observations reported in March 2009, and the 2011 ones reported in December 2011.

The Table below shows the actual hours observed, using video methods with the recordings observed by trained staff, and analysed to provide details of the usage and waiting times for both passengers and vehicles. Passenger waiting time was kept to that which was true unmet demand, ie when passengers were waiting but no hackney carriage vehicle was there. The only exception was at the private station rank where we did not observe vehicles waiting in the rear car park area, which we also understand can be restrained in providing feeder services by the route between the two locations being controlled by traffic lights.

Further comparison is provided later in regard to how the 2014 hours compare to those undertaken in 2011 and 2008 together with discussion of how demand has developed since that time.

The Walcot Street rank was not available due to roadworks on the planned evening for review, although other observations at some sites were increased partly to cover the hours that would otherwise be lost. The final survey hours covered was 127.

Location	**Day / date (all 2014)**	**Time observed**	**Total hours observed**
24 hr ranks			
Abbey	Friday 10th October	08:00 to 05:00	21
	Saturday 11th October	05:00 to 05:00	24
Westgate	Friday 10th October	16:00 to 05:00	13
	Saturday 11th October	05:00 to 06:00	25
Walcot St	Saturday 11th October	(Rank closed)	0
George St	Saturday 11th October	22:00 to 02:00	4
Queen Square	Friday 10th October	09:00 to 21:00	12
Night only rank			
Southgate St	Friday 10th October	22:00 to 03:00	5
	Saturday 11th October	23:00 to 03:00	4
Private Rank			
Bath Spa Station	Friday 10th October	08:00 to 03:00	19
TOTAL HOURS			**127**

Full details of the observed volumes of passenger and vehicle traffic are included in **Appendix 1**. The survey comprised some 127 hours of observation. Our observations took account of feeder ranks where necessary to ensure true estimation of the hackney carriage waiting times at ranks for passengers (although there were no such locations amongst the ranks observed in Bath). The Table below summarises the time periods observed at each locations as well as providing overall operational statistics for each location during each period of observation. A detailed description of the observations follows below.

For each rank, we conclude with an overall qualitative appreciation of the performance of the rank over the days observed:

- Poor – major issues with service to rank resulting in long passenger queues;
- Fair – rank deals with high volumes but sees some passenger queueing at times;
- Good – no passenger queueing observed but nothing else of note in way rank operates;
- Excellent – very high turnover with no passenger queueing and clear examples of drivers helping passengers use rank;
- Developing – rank of recent origin but clearly growing in use

Rank	Period (2014)	Total passengers observed	Total loaded vehicle departures	Passengers per loaded vehicle	Empty vehicle departures	% of vehicles leaving empty	No. of passengers having to wait for vehicle to arrive
24 hr ranks							
Abbey	Friday 10th October 08:00 to 05:00	1132	653	1.7	61	9	106
	Saturday 11th October 05:00 to 05:00	1701	842	2.0	50	6	598
Westgate	Friday 10th October 16:00 to 05:00	165	96	1.7	7	7	26
	Saturday 11th October 05:00 to 06:00	186	108	1.7	12	10	49
George St	Saturday 11th October 22:00 to 02:00	74	29	2.6	22	43	5
Queen Square	Friday 10th October 09:00 to 21:00	2	2	1.0	3	60	0
Night only rank							
Southgate St	Friday 10th October 22:00 to 03:00	53	24	2.2	11	31	9
	Saturday 11th October 23:00 to 03:00	34	14	2.4	6	30	2

Private Rank							
Bath Spa Station	Friday 10th October 08:00 to 03:00	1228	827	1.5	5	1	268

Overall comments on ranks

During the course of the survey, just one passenger was observed accessing the hackney carriage fleet at the Abbey Rank (at 15:50 on the Friday) in a wheel chair.

There were 36 other noted instances where the vehicle driver provided assistance to those entering vehicles, although there were no other visibly disabled persons noted during the course of our observations.

Abbey (Orange Grove) rank

This rank is the main central rank located very close to the Abbey and within a road loop which is also used by tour buses but is principally used to provide the rank spaces including some feeder. When there are excess vehicles, these wait in other parts of this turning area in some cases causing issues with buses and other vehicles servicing the area.

The rank was observed from 08:00 on Friday 10th October 2014 through to 05:00 on Sunday 12th October 2014.

This rank has marshals from Thursday to Saturday and records were obtained from the company responsible to identify overall demand over an extended period of time (see further below).

Friday observations

During the observations on the Friday 1132 passengers were observed leaving in 653 vehicles, giving vehicle occupancy of 1.7 persons per vehicle – moderate. 61 vehicles left empty (just 9%). 106 passengers in total were observed having to wait for vehicles to arrive, in the 10:00, 16:00, 17:00, 19:00, midnight and 01:00 hours, although the longest wait was no more than five minutes. The average wait shared between all those experiencing a wait was just under two minutes, but between all passengers the average wait is just 10 seconds.

In passenger terms, the rank was relatively quiet between the start of observations and 14:00 with the largest number of passengers being 21 at 13:00, and the lowest just five persons. There were between 33 and 51 passengers in each and every hour between 15:00 and 20:00, after which passenger numbers rose to a peak of 176 in the midnight hour. From 23:00 until 02:00 every hour had over 121 passengers. The 03:00 hours saw 73 passengers and the area became quiet after the 04:00 hour (with no passengers or vehicles from 04:46 until 06:35).

Average vehicle waiting times for fares were between eight and 25 minutes in the quieter morning period. In the next period the average vehicle wait was five to eight minutes, and after 20:00 vehicle waits fell to between one and eight minutes. Longest recorded vehicle waits were rarely longer than 25 minutes apart from two occasions in the morning period, when one vehicle was observed to wait 49 minutes for a fare.

The rank does demonstrate peaky demand – with the busiest four hours (146) having nearly fifteen times more passengers than the quietest four hours (10)

Saturday observations
During the observations on the Saturday 1701 passengers were observed leaving in 842 vehicles, giving vehicle occupancy of 2.0 persons per vehicle – relatively high. 50 vehicles left empty (6%), and 598 passengers were observed to wait for a vehicle to arrive. People had to wait in every hour from 10:00 to 13:00, between 15:00 and 18:00 and in every hour from 22:00 onwards until the area became quiet after 04:47. The longest recorded passenger wait was seven minutes. Average passenger waits for those experiencing a wait were just over two minutes, with the average wait shared over all passengers being 43 seconds – higher than on Friday.

In passenger terms, the rank saw 3-9 passengers between 09:00 and 11:00. From 12:00 to 14:00 there were 33-47 passengers. Between 15:00 and 21:00 flows varied from 41 to 85. From 22:00 to 03:00 there were never less than 126 passengers in any hour – with the peak of 207 in the midnight hour (the same hour as on the Friday night) – but 18% busier.

Average vehicle waiting times for fares were between one and nine minutes, with the longest vehicle wait for a fare recorded being 21 minutes for a vehicle arriving in the 18:00 hour. Vehicle waits were much lower after 23:00 with most being two minutes or less. In fact, after just before 04:00 vehicles were waiting for passengers and several left after waiting, although a passenger did then arrive when no vehicles were present, ending up waiting six minutes for a vehicle to arrive.

Saturday saw even peakier flows – with the busiest four hours (average of 199 passengers) some 50 times busier than the quietest four (just 4 passengers).

Overall, service to this rank is **fair**.

Westgate Buildings rank
This rank has four spaces and is within the main central area, albeit some distance from the Abbey and some of the main shops. It is located on the driver side of the road and there may be issues with loading of passengers from the passenger side as there is a reasonable amount of traffic adjacent to the rank. The rank was observed from Friday 10th October 2014 at 16:00 through to 06:00 on the morning of Sunday 12th October 2014.

Friday observations
During the observations 165 passengers were observed leaving in 96 vehicles, giving vehicle occupancy of 1.7 persons per vehicle – moderate. Seven vehicles left empty (7%), with 26 passengers having to wait for a vehicle to arrive. Waits occurred in the 18:00, 19:00 and then every hour from 21:00 through to 01:00. The longest a person waited was 10 minutes, with the average wait of nearly 4.5 minutes for those who ended up waiting. However, when shared over all passengers the average wait reduced to 42 seconds.

In passenger terms, demand was negligible (one to seven passengers) before 20:00 and after 03:00. Between these hours demand varied from 14 to 32 passengers per hour with the peak being in the 22:00 hour.

Average vehicle waiting times for fares were between two and 18 minutes, with the longest vehicle wait for a fare recorded being 21 minutes. In three of the busier hours, vehicle waits were lower than 1.5 minutes – in two cases less than a minute.

Saturday observations
During the Saturday observations 186 passengers were observed leaving in 108 vehicles, giving vehicle occupancy of 1.7 persons per vehicle – moderate. 12 vehicles left empty (10%), with 49 passengers having to wait for a vehicle to arrive. Those waiting were in the 19:00, all hours 22:00 to 01:00 and 03:00 hours although only in the 03:00 hour did all passengers wait for a vehicle to arrive. Again the longest wait was 10 minutes. For those waiting, the average wait was just over four minutes. The average wait shared out between all passengers was just over 1 minute.

In passenger terms, the rank was principally used after 19:00. Before that there were a handful of passengers at 15:00, 17:00 and 18:00 and passenger levels reduced again for the 02:00 and 03:00 hours (five and two passengers respectively). Between 21:00 and midnight hours flows ranges from 14 to 26 with 22:00 and 23:00 the joint highest. Although the Saturday was busier than the Friday, passenger levels fell earlier on the Saturday and the peak was extended.

Average vehicle waiting times for fares were between zero and six minutes when the rank was busy. During the lower use hours, vehicles did wait longer for fares – although the longest observed wait was 19 minutes in the 21:00 hour, and six to nine minutes in the busier periods.

Summary
Overall, service to this rank is **fair** despite demand being low even at peak times.

Walcot Street rank
This location is located near to a bus stop adjacent to the Hilton Hotel and not far from a major supermarket (although relatively far from any entrance to the store) Although well-marked the location is poorly signed and can also be hard to get to from a vehicle point of view as well as not being obvious to passengers. It was planned to be observed on Saturday 11th October 2014 from 22:00 onwards but road works meant it was not available and no repeat was undertaken as the location was not expected to see any usage.

George St rank
This rank, with three spaces, loads from the passenger side but is located on a very busy street with steps up from the rank to any origin or destination. Vehicles waiting here would be very obvious to passengers although they may feel unsafe waiting since any vehicle waiting here would partially obstruct capacity, particularly if another vehicle is waiting to turn right into nearby Milsom Street. The location was observed on Saturday 11th October 2014 from 22:00 through to 02:00 on the Sunday morning.

During the observations 74 passengers were observed leaving in 29 vehicles, giving vehicle occupancy of 2.6 persons per vehicle – very high. 22 vehicles left empty (43%), and five passengers were observed to wait for a vehicle to arrive – the longest wait being six minutes. Waits occurred in the midnight and 01:00 hours, but only affected a small percentage of those arriving at this location. For those waiting the average was just under four minutes, but shared over all those using this rank the wait averages just 15 seconds.

In passenger terms, demand was relatively low with the range of passenger numbers between eight and 27, with three of the four hours seeing 19 or more. The peak hour was 01:00

Average vehicle waiting times for fares were between one and two minutes, with the longest vehicle wait for a fare recorded being seven minutes in the 23:00 hour.

Overall, service to this rank is **good** given the relatively low demand.

Queen Square rank
This rank has been added to the provision of waiting spaces for hackney carriages since the 2011 survey. The two space rank on the side of the square nearest to the shopping area was introduced in 2013. It was observed on Friday 10th October 2014 from 09:00 to 21:00.

During the observations just two passengers were observed leaving in two vehicles, giving vehicle occupancy of 1 person per vehicle – very low. Three vehicles left empty (60%), but no passengers were observed to wait for a vehicle to arrive. One vehicle did wait at this location for ten minutes but did not obtain any custom. The only passengers were in the 09:00 hour and in the 18:00 hour.

Overall, this rank is at best developing, and at worst not really likely to be used, although it is not clear at the present if it might develop further.

Southgate Street rank
This rank has also been added to the provision of waiting places for hackney carriages in 2013. During the daytime the location is an active bus stop, but from 21:45 to 06:00 it is available for hackney carriages. It is located in a layby with passengers entering from the passenger side and near to the more recent shopping centre at the lower end of Bath city centre. There are three spaces available. The location was observed on two evenings, Friday 10th October 2014 from 22:00 to 03:00, and the following evening, Saturday 11th October 2014 through from 23:00 to 03:00.

Friday observations
During the Friday observations 53 passengers were observed leaving in 24 vehicles, giving vehicle occupancy of 2.2 persons per vehicle – relatively high. 11 vehicles left empty (31%), and nine passengers were observed to wait for a vehicle to arrive. The longest wait was 12 minutes – the only location and day in the survey where there was any waiting of 11 minutes or more. For those waiting, their average wait was nearly four minutes, but when shared out over the full usage of the rank we observed, the average wait was 38 seconds.

In passenger terms, the level of passengers was low before the midnight hour and not much greater after – with 11 to 21 passengers in each hour between midnight and the 02:00 hour. The rank was busiest in the 02:00 hour and a vehicle was still waiting at the rank at the end of our observations.

Average vehicle waiting times for fares were very low – usually around 1.5 minutes, although in the 02:00 hour a vehicle did wait ten minutes and the average wait had increased to around four minutes.

Saturday observations
During the Saturday observations 34 passengers were observed leaving in 14 vehicles, giving vehicle occupancy of 2.4 persons per vehicle – very high. Six vehicles left empty (30%), and two passengers were observed to wait for a vehicle to arrive. Neither of these waited more than a minute in the midnight hour.

In passenger terms, demand was low – with two hours with four passengers followed by 14 and 12 passengers with the peak at 01:00. Demand was generally lower than on the Friday.
Average vehicle waiting times for fares were between one and three minutes with no vehicle waiting more than four minutes possibly suggesting the rank is more served by passing vehicles or those pausing briefly than vehicles actively waiting for passengers.

Abuse by other vehicles
On the Friday 14 other vehicles used the rank, some waiting there for up to 20 minutes, which would hamper the potential effectiveness of this rank.

There were 17 such occurrences on the Saturday although seven of these were emergency vehicles using the rank.

Summary
Overall, with very low demand, service to this rank is **good**. There would be value in ensuring the rank was kept clear from other vehicles to allow it to develop further, although use by emergency service vehicles could not be prevented.

Bath Spa station private rank
This rank is a separate area on the forecourt of the station providing in the order of 19 spaces for hackney carriages to wait for passengers. The rank requires a separate permit from the rail station operator, available at a cost from their agents. When more vehicles arrive than can be fitted on the forecourt, the excess wait at the rear of the station and gain access to the front through the tunnel, although this can cause delay as the route is controlled by traffic lights. The location was observed from 08:00 on Friday 10th October until 03:00 on the Saturday morning. The last train was due from London at 01:15 on that morning.

During the observations 1228 passengers were observed leaving in 827 vehicles, giving vehicle occupancy of 1.5 persons per vehicle – moderate. Just five vehicles left empty (1%), with 268 passengers observed to wait for a vehicle to arrive, in the 13:00 hour, and every hour from 15:00 to 18:00, 20:00, 21:00 and 23:00 to 01:00. It is possible that some of these waits may have been while vehicles transferred from the rear car park to the frontage.

Just 12 passengers waited between six and seven minutes with the longest wait being seven minutes. The worst waiting was for the busiest hour of 21:00 although in that hour no-one waited more than five minutes.

The last passengers left at 02:12 but none of the later passengers had to wait for any vehicle to arrive.

In passenger terms, usage increased every hour from a low of 20 in the 08:00 hour to 56 in the 12:00 hour. The next six hours all saw between 56 and 60 passengers. From 18:00 to 23:00 there were between 86 and 163 passengers in each hour with a peak at 21:00. After 22:00, passenger flows dropped from 94 to 56 in the 01:00 hour.

Average vehicle waiting times for fares were between four and 20 minutes from the 08:00 to the 13:00 hour after which vehicle waits ranged from three to eight minutes. All these values exclude any waiting time in the rear car park or any transfer time from the feeder to the main rank. In the early part of the day the maximum wait on the forecourt ranged from 18 to 33 minutes whilst later in the day the maximum wait (excluding rear car park) was nine to 19 minutes.

Overall service to this rank is **fair**. With the need for a supplementary (paid for) permit out of the council control, none of the unmet demand at this location can be included within any estimate of significance of unmet demand for the area.

Comparison of overall supply and demand

The Table below provides a slightly different summary of supply and demand, comparing average vehicle arrivals per hour with average loaded departures per hour, ie seeing how supply and demand match on average.

Rank	Period	No of hours rank active	Average vehicle arrivals / hr	Average loaded departures / hr	Overall judgment of service provided
24 hr ranks					
Abbey	Friday 10th October 08:00 to 05:00	20	36	33	Fair
	Saturday 11th October 05:00 to 05:00	21	42	40	
Westgate	Friday 10th October 16:00 to 05:00	12	9	8	Fair
	Saturday 11th October 05:00 to 06:00	12	10	9	
George St	Saturday 11th October 22:00 to 02:00	4	13	7	Good
Queen Square	Friday 10th October 09:00 to 21:00	2	3	1	Developing??
Night only ranks					
Southgate St	Friday 10th October 22:00 to 03:00	5	7	5	Good
	Saturday 11th October 23:00 to 03:00	4	5	4	
Private Ranks					
Bath Spa Station	Friday 10th October 08:00 to 03:00	19	44	44	Fair

In terms of active use of ranks, the Abbey sees the most active rank followed by the private rail station location. Westgate sees mainly night usage as do George St and Southgate St, although all of these ranks have much lower levels of patronage than the principal two ranks.

In terms of loaded vehicle departures, the busiest rank is the private rail station rank, closely followed by the Abbey rank (which is busiest on Saturdays). These three locations / days see around 40 vehicle arrivals per hour on average with a similar level of passenger departures at the station and a marginally lower level at the Abbey rank (and more so on the Friday). None of the other ranks see more than 13 average vehicle arrivals per hour and the highest loaded vehicle departure average is just 9 (for Westgate, Saturday). Southgate St rank is clearly becoming established though with low usage, whilst it is not yet clear if Queen Square will develop or not.

In terms of service, the relatively high levels of demand at the Abbey and rail station mean there is a lot of passenger waiting for vehicles which means the service level can only be counted as 'fair'. At George St and Southgate St the lower levels of demand tend to be well met, resulting in a conclusion of 'good' service. Westgate only sees 'fair' service and it is unfair to give Queen Square any rating due to the low usage.

Comparison of total demand with previous survey

The table below calculates a typical week from the observations undertaken in 2014 and compared to information from the two previous surveys. Ranks or pick-up locations are listed in descending order of passenger usage in 2014.

Rank	Passengers per week, 2008 survey	Passengers per week 2011 survey	2014 survey (approx. wkly est)
Abbey	5,092 (51%)	4,085 (42%)	8,212 (47%)
Bath Spa Station	3,705 (41%)	4,877 (50%)	7,982 (45%)
Westgate	972 (8%)	669 (7%)	1,044 (6%)
George St	217 (2%)	96 (1%)	222 (1%)
Southgate St	n/a	n/a	140 (1%)
Queen Square	n/a	n/a	12 (0.0%)
Walcot St	94 (1%)	Not used	Not available
Henry St	Not surveyed	Not used	Not surveyed
South Parade	Not surveyed	Not used	Not surveyed
Total	***10,080 (100%)***	***9,727 (100%)***	***17,612 (100%)***
Growth from previous	***n/a***	***-4%***	***+81%***
Growth from 2008	***n/a***	***-4%***	***+75%***

Note – Total includes all observations at relevant points as available, both sets factored to full week from detail available.

Total rank-based usage of hackney carriages in B&NES fell by 4% between 2008 and 2011, but has seen significant growth since 2011, and a net 75% growth since 2008. Whilst the two new ranks have added some of the growth, the principal growth in usage has been at the two main ranks.

However, in terms of share between locations the two main ranks remain those that take 92% of demand in all three surveys – remarkably consistent. However, these two ranks are now more equal in demand than they have been in the past, with the station being dominant in 2011 (but not in 2008 or now). The growth does seem very high – although the new shopping centre near the station is now fully operational and severe traffic congestion is both hampering the ability of the fleet to meet demand and increasing demand through people choosing to come to Bath sometimes by public transport and then returning by licensed vehicle (particularly with the unreliability of public transport with the congestion).

In annual terms, the patronage (including hailing) saw only marginal growth from 2008 to 2011 (mainly related to high hailing estimates in 2011), but between both 2008 and 2011 and 2014 the annual figures suggest 65% growth – with some 915,798 passengers using hackney carriages in B&NES city zone from ranks and hailing based on the current survey estimates.

Plate activity levels

A sample of plate numbers were collected during the rank surveys to identify the level of activity of the fleet during the survey. Some 565 vehicle movements were recorded at locations near to the ranks – all but five of which were Bath city hackney carriages.

91 of the Bath city hackney carriages were observed (75%) – a good level given the sample was just on one of the survey days. Of those licences observed, 40% were seen at the Abbey only, 23% at the Station only and 37% equally between both locations. The vehicles servicing both locations accounted for nearly half of all observations. 48% of observations were in the evening to late evening period, with 22% in the early hours (after midnight) and 30% during daytime hours.

Of all the hackney carriages observed, one was seen 16 times, another 15, two more 14 – with in total 14 different vehicles seen 10 times or more within the ten surveyed hours. 38 were seen between six and nine times and just seven only once.

This suggests a very active fleet overall both in terms of the number of vehicles serving and the frequency that they operate.

Demand at Abbey Rank over time

The Abbey rank currently sees marshals servicing the rank from 23:00 to 03:00 usually commencing on Thursdays, Fridays and Saturdays (ie early hours of Friday, Saturday and Sunday mornings). Notes of the number of people having passed through the rank are taken at midnight, 01:00, 02:00 and 03:00 (a running total tally). Over the time in place, the marshals have revised queueing arrangements to maximise the number of passengers that can be taken away by given numbers of vehicles.

Comments include issues with servicing larger groups of people, need for their services to continue to 04:00, and the need for a clear notice saying that people must finish eating food before entering vehicles (a common reason that drivers ask people to wait for another vehicle). They felt issues arose if vehicles ended up going longer distances as this reduced the effectiveness of those available.

The marshals told us that Saturday (early hours of Sunday morning) is the busiest, followed by Friday (Saturday early hours) and that the main issue occurs in the 02:00 to 03:00 hour after many clubs close.

Data was made available from August 2012, including for the weekend of our surveys, up to the last but one weekend of November 2014. Comparing our data with that for the marshal data shows a good comparison (656 passengers in the same period on the Friday compared to 670 marshal count, 946 on the Saturday compared to a marshal count of 1,055). This confirms our data was correct from an independent source and that the marshal data is also reliable.

Comparing the survey weekend with the rest of October 2014, the survey weekend was 95% of the October average level over the three days. The survey weekend was about 25% higher than the average for the full year between November 2013 and October 2014. This suggests our analysis has not reviewed the peak and is reasonable for making decisions about the current policy and its impact on passengers.

Further checks were undertaken – October 2014 average passenger numbers were some 31% higher than those for October 2013 but 11% below those for October 2012. Comparing November 2013 and November 2014 also saw a growth of 37% between 2013 and now. This tends to corroborate our overall survey review that there has been growth in passengers of a significant nature more recently. This helps to explain the growth in queues at ranks and growth in unmet demand.

Application of the ISUD index

The industry standard index of significant unmet demand (ISUD) has been used and developed since the initial Government guidance that limits could only apply if there was no significant unmet demand for the service of hackney carriage vehicles. Initially developed by a university, it was then adopted by one of the consultant groups undertaking surveys, developed further by them in the light of various court challenges, and most recently adopted as an 'industry standard' test utilised by most current practitioners of unmet demand studies.

The index is principally used to identify a statistical guide if observed unmet demand is in fact significant. Early in the process of developing the index, a cut-off point of 80 was identified beneath which no conclusion of unmet demand being significant had been drawn, and over which all studies had concluded there was significant unmet demand. This level has become accepted as the guide. Once unmet demand has been identified as significant it is usual for a calculation to be undertaken to identify the exact number of new licences needed in order to reduce the significance of the unmet demand below the threshold – although this cannot be an exact science in terms of outcomes due to the high number of parameters involved in determining where new licences actually end up working – there is no way to guarantee that licences will focus on reducing the unmet demand at all.

In the case of B&NES, the private rail station rank should be excluded from the ISUD calculations as with the need for a supplementary permit and being on private land it is a location out of the Council control. Hence in such cases, even if more licences were issued the Council has absolutely no way to ensure they will be available hence the exclusion from the calculations in all our studies – although it remains important to review operation at these sites as the public rarely differentiate between ranks in a Council area.

The ISUD calculations draw from various elements of the work, reflecting statistics which seek to capture components of 'significant unmet demand' although principal inputs are from the rank surveys, factored to produce a typical week of observations based on the knowledge available to us.

The current index has two elements which can negate the need for use of the index by setting the value to zero. The first test relates to if there are any daytime hours (Monday to Friday 1000 to 1800) where people are observed to queue for hackney carriages. Using the direct outputs from the survey a value of 16.7% is estimated. However, the survey also found that there is effectively only the Abbey rank amongst the council ranks operating during the daytime, and that peak hours here can be affected by traffic congestion. A further test expanding our observations to focus on the active daytime rank provision and the full week reduces this value to 7.5%. We recommend that the two different levels be used as either ends of a sensitivity test to indicate the level of significance of unmet demand (see below).

The other index that could be zero – proportion of passengers in hours in which waits occurred which was over 1 minute – was 23% for the council rank sample. We do not consider any need to review this particular value.

The seasonality index is 1.0 since the surveys were undertaken in October 2014.

The area exhibits peaked demand, so this factor is 0.5.

Average passenger delay in minutes across the whole survey is 0.53 minutes for Council only ranks.

From the public attitude work, the latent demand factor is 1.16, assuming all who did not give an answer had not ever given up waiting – ie there were no hackney carriage relevant responses.

The ISUD index for the full survey therefore ranges from 118, above the value of 80 used to suggest significance of unmet demand, to 53 using the sensitivity test, which is below the index level. This therefore suggests there is a susceptibility to the observed unmet demand tending towards being significant. This needs to be considered with other evidence to understand the right course of action with plate numbers.

Comparison to previous studies
The ISUD index was used in the last two previous studies. The Table below shows the change in specific indices between years to give an indication of the movement of the market during this six year spell. The surveys were all undertaken at the same time of year, so the seasonality index was 1.0 in all cases and has not been reported. There will be some differences arising from the specific sample hours used but in general an outline comparison is informative on the state of the hackney carriage market in B&NES Bath zone over the last six years.

Element	2008	2011	2014
Average wait (mins)	1.01	0.65	0.53
Peak factor	1.0	0.5	0.5
% Queues in weekday daytime hours	13	0	16.7 (7.5)
% pass in hours with waiting over 1 minute	8	34	23
Latent demand	1.31	n/a	1.16
Overall index	138	0	118 (53)

The principal change that has occurred since 2011 is the incidence of waiting observed during the weekday daytime hours, although the current maximum level is only marginally higher than that in 2008. A major shift from 2008 to 2011 was the change from the demand being non-peaky to peaky, a change that has remained the same in 2011. Interestingly, since 2011 both the overall average wait time and the percentage of passengers in hours when there was an average queue time of over a minute have reduced – there is better service at busy times. Latent demand was not included in 2011 for some reason (but would not have made any difference given the zero value involved in the estimation).

Further discussion occurs below to make use of this information in the decision regarding the significance or otherwise of unmet demand.

4. Public Consultation results

An eighteen question survey was undertaken with 201 persons in the Bath and North East Somerset Council area (500 were obtained in 2011). Surveys were undertaken within the main central area of Bath on Friday 16th and Saturday 17th May 2014. Responses were mainly from those available during the day time, following standard practise for these interviews. In agreement with the Council, we screened out any non-local respondents as these were mainly likely to be tourists who might only use licensed vehicles for specific purposes very occasionally and who were felt would skew the results, or more likely simply not answer many questions and effectively deny local people the chance to provide relevant views. The Table below summarises the overall responses.

Question	Response	(%)
Do you live in the Bath and North East Somerset (B&NES) area?	Yes	100
Have you used a taxi in the last three months in the B&NES area?	Yes	**57**
How often do you use a taxi within this area?	Almost daily	3
	Once a week	22
	A few times a month	27
	Once a month	11
	Less than once a month	**36**
	Trips per person per month	2.7
	% responding	*75*
How do you normally get a taxi within this area?	At a taxi rank	38
	Hail in the street	0
	Telephone a taxi company	**57**
	Use a Freephone	2
	Use my mobile or smart phone	3
	% responding	*77*
If you book a taxi by phone, please tell us the three companies you phone most	*See discussion below*	
How often do you use a hackney carriage within the B&NES area? (% of those giving a response)	Almost daily	1
	Once a week	17
	A few times a month	25
	Once a month	14
	Less than once a month	**42**
	Trips per person per month	0.5
	I can’t remember when I last used a hackney carriage	17
	I can’t remember seeing a hackney carriage in B&NES	9
	No response at all (% of all)	*36*

Please tell me the ranks you are aware of in B&NES and for each if you use them	*See discussion below*	
Is there any location in B&NES where you would like to see a rank, and if it was there and vehicles were available, would you use it?	*See discussion below*	
Have you had any problem with the local hackney carriage service? (indicate as many as apply)	Total problems cited	58
	By no of people=	43
	Of total problems %=	
	Design of vehicle	7
	Driver issues	21
	Position of ranks	22
	Delay in getting a taxi	30
	Cleanliness	3
	Other –various	17
	Total for above	100
	Other – none - % of all interviews	32
What would encourage you to use hackney carriages or use them more often	People responding	133 (66% of all)
	No of responses	175
	% of all responses:	
	Nothing	10
	Better vehicles	3
	More hackney carriages I could phone for	22
	Better drivers	3
	More hackney carriages I could hail or get at a rank	16
	Better located ranks (please state where)	11
	Other – various	5
	Other - cheaper	30
	Total of above	100

Question	Response	
Do you consider you, or anyone you know, to have a disability that means you need an adapted vehicle?	% who responded	100
	No	84
	Yes - I need a wheelchair accessible vehicle	2
	Yes – someone I know needs a wheelchair accessible vehicle	10
	Yes– I need an adapted vehicle but not a wheel chair accessible	3
	Yes – someone I knows needs an adapted vehicle but not wheel chair accessible	2
	Other	0
If you arrived at a rank and there were saloon and wheel chair accessible vehicles there, which vehicle would you choose?	First available	65
	Saloon	31
	Wheel chair accessible	4
If you chose a vehicle type in the question above, why did you chose that specific vehicle type?	*See discussion below*	
Have you ever given up waiting for a hackney carriage at a rank in Bath?	No	20
(amended to remove non-rank responses)	No (not at a rank)	16
If you have an issue with a taxi journey, how would you complain?	Complain to driver	23
	Phone council	30
	Report on council web site	17
	Would not complain	22
	Other	9
	% responding	75
Do you have regular access to a car?	Yes	60
Do you use taxis less now than you did three years ago?	Yes	25
	Reasons given:	
	cost	50
	Changed circumstances	39
	Use bus	8
	Use car	3

Please tell us for what journeys you have used taxis in the last three months in B&NES	Business	15
	Pleasure	51
	Connect to other transport	14
	Other	20
Gender (value in bracket from census, 2011 est of 2014)	Male	49 (49)
Age (value in brackets from census, 2011 est of 2014)	Under 30 (16-29)	28 (27)
	31-55 (30-54)	43 (37)
	Over 55	29 (36)

We ensured that those interviewed were those living in the Bath and North East Somerset area. This was done in agreement with the Council since it was considered that tourists would have specific needs of the licensed vehicle service but that their use tended to be very specific and very occasional and that this survey needed to focus on the more regular needs of local people. This arose because of the high level of international and longer distance tourists in central Bath. Such tourists might not have very many opinions and it was felt important to maximise feedback from those most likely to use local licensed vehicle services the most.

57% of those interviewed had used a licensed vehicle in the Bath and North East Somerset Council (B&NES) area in the last three months, a high level of recent usage. However, in 2011, the recent user proportion was 90%, suggesting a fall in usage.

Of the respondents who told us they had used a licensed vehicle recently, many said how often they used a licensed vehicle. We have assumed the remaining non-respondents do not use licensed vehicles and calculated the average level of licensed vehicle trips per month per person below. On average, there are 2.7 person trips by licensed vehicle per month based on these assumptions, a high level.

77% of interviewees told us how they obtained licensed vehicles in the Council area. By far the highest percentage got taxis by booking them by telephone (57%), followed by mobile or smart phone (3%), with the total by phone methods being 62%. 38% said they got them from ranks and none said their normal method was hailing.

The use of phones was queried further, seeking to understand the companies that people used. 49% of respondents listed the companies they contacted. Of these, 23% gave two companies and the rest just named a single company. None provided three companies.

Only five companies were named, with one person saying they would use ‘any’ company. The largest company took 70% of all mentions, very dominant – and also took 63% of those where they were the only company named. This company has an office near to a little used but well-marked rank, and has a good proportion of hackney carriages operating on its circuit. The next largest company took 27% of all mentions, with the three others only taking 1% each. This suggests little competition in the area.

A set of questions were then asked relating specifically to use of hackney carriages. 38% of those questioned provided hackney carriage usage frequencies. A further 17% said they could not remember when they had last used a hackney carriage in the area, and 9% said they could not remember seeing one in the area – which suggests the hackney carriage fleet might not be as obvious as in some other locations. This could be related to the fleet being a mixed saloon / wheel chair accessible style and without a specific livery.

The first question asked how often people used them. Based on the 38% who gave an answer, and assuming everyone else did not use them, there are 0.5 hackney carriage trips per person per month in the B&NES area. Compared to the 2.7 licensed vehicle trips, this is around 18% of licensed vehicle usage – about half the estimate of those who said they used ranks to obtain licensed vehicles. This relates to the relative infrequency of usage by those obtaining hackney carriages from ranks.

People were asked to name all the rank locations they were aware of in the Council area and if they used the locations they named or not. Several ranks were given 'colloquial' names, or by places they were near (eg 'near Sainbury's Local', near Police station), which were allocated to the rank nearby. There was an equal mix of people calling Orange Grove 'Abbey rank'. 68% of people gave at least one location, a high value.

54% of those answering gave three locations, 28% gave two and the remaining 18% gave a single location. Although the most frequent three sites mentioned together were the Abbey, the railway station and Westgate Street, people often mentioned the Abbey, the railway station and a lesser used rank.

61% of those giving ranks said they used the locations they quoted, whilst 38% said they did not use them, with 1% not saying if they used the location or not. In total, there were 288 mentions of rank locations by all those interviewed. Of these, the most frequent used was the railway station (44%) followed closely by the Abbey (40%). 9% quoted Westgate Buildings, split almost evenly by those using it and those not. 3% said South Parade (which is the base of a hackney radio company), 2% said Henry Street (all claimed to use it), and 2% said Queen Square (but most did not use that location). One person mentioned Walcot Street indirectly but did not use it.

This shows good knowledge of ranks, and although the two main ranks dominate, there remains relatively good apparent usage of Westgate Buildings, South Parade and Henry Street, although the latter two may well be from visits to the adjacent office or telephone bookings from a nearby shop.

When asked about new locations, 56 people (28%) gave at least one location. 51% gave a single suggestion, 45% suggested two places and 4% (two people) suggested three locations. This is a relatively high level of comment about need for new ranks. A total of 85 suggestions were made, and all but two of these said they would use the new rank were it used by vehicles. However, when reviewed, three of the top five requests already have ranks located there (George Street, Walcot Street and Milsom Street, albeit lesser or little used ranks), and the two other top locations are requests for ranks at the two more recent supermarkets (who we understand have private hire phone links). All other city centre locations mentioned (eight) were also near to current ranks. Six out of central locations were mentioned by one person each, including at the University and at the hospital.

The conclusion from these answers is that current ranks need to be better advertised and that more use would most likely occur if vehicles regularly were available at them (which would also help advertise them more).

Just under a third of all respondents took time to say they had no issue with the hackney carriage service at all. Some 43 (21%) of respondents told us issues they had with the hackney carriage service in B&NES. Of these, just 2% had three issues, 30% had two issues and the remaining 68% had just a single issue. This is a stronger response to there being issues than in other recent studies, but still represents four fifths of those interviewed either saying they had no issue, did not use them, or were not concerned enough to state any issue.

When the frequency of issues is considered, delay in getting a taxi was the largest issue with 29% of responses. Position of ranks was next (22%) followed by driver issues (21%) and other (varied) 17%. 7% had issue with vehicle design and 3% had issue with cleanliness. Taken alongside the overall level of response, these issues are not significant but are still worthy of consideration at least by the trade as feedback from customers or potential customers.

More people responded to what might encourage them to use hackney carriages or use them more, totalling some two thirds of those interviewed. Of these, just 2% gave three reasons, 27% gave two reasons and the remaining 71% gave a single reason they would use hackney carriages more.

A total of 175 different responses were provided. Of these, as usual in this type of survey, the largest response was more use if they were cheaper (30%) (although this was not specified in the question and people had to say 'other'). 10% said nothing would make them use hackney carriages more – quite a low level. 22% said they would use more if there were more hackney carriages they could phone, 16% more at a rank and 11% were ranks located better.

Better drivers and better vehicles both scored 3% each, suggesting the standard of the fleet is already very good. This generally suggests that more people would use the hackney carriage fleet if it was more readily available to people. Only one person said they would use more were vehicles wheel chair accessible.

People were asked if they or anyone they knew had a disability needing either a wheel chair accessible licensed vehicle, or a vehicle adapted in some other way. All those interviewed responded – quite unusual. On average 84% said they did not themselves need, or know anyone who did need an adapted vehicle (a typical response). Of the total respondents, 12% said they would need, or someone they knew would need a wheel chair accessible vehicle and 5% said a differently adapted vehicle, not wheel chair accessible. This confirms the mixed vehicle policy that is current remains reasonable, although the proportion should perhaps favour the wheel chair accessible style.

Just under two thirds of those responding would take the first available vehicles, whilst just under a third would take the saloon style. Just 4% would choose a wheel chair accessible vehicle.

Some 16% said why they chose a particular vehicle type. Of these, 62% said they would leave the wheel chair style for those that might need it, 16% said they used wheel chairs and therefore chose that sort of vehicle, and 9% said they simply preferred saloons. 13% gave a variety of other reasons, none of which were significant.

Of those answering if they had ever given up waiting for a hackney carriage, 20% said they had. This was 16% of all those interviewed. Equal amounts had given up at the station and at the Abbey rank (just over a third for each option). A sixth had given up at Westgate Buildings. Four of the other five locations quoted were lesser used ranks or near such ranks, and just one was a location without a rank. The latent demand factor for this survey should therefore be 1.16.

People were asked if they had an issue with a taxi journey, how they would complain. Three quarters of respondents gave an answer. Of those responding, the highest proportion, 30% would phone the council, 23% would complain to the driver, 22% would not complain and 17% would report the issue on the council website. Of the 9% saying 'other' 63% said they would phone the company (or write in) and 21% said they did not feel there was any point in complaining. This seems to be an overall healthy attitude to reporting issues and a reasonable spread of methods used to do so.

60% said they had regular access to a car. 25% said they now used licensed vehicles less than they did three years ago. Of the total interviewees 19% said why they now used licensed vehicles less. 50% said due to cost, 39% said their circumstances had changed reducing their need for their use, and 8% said they used the bus. 3% said they used a car.

73% gave reasons they had used licensed vehicles in the last three months in the B&NES area. A total of 178 replies were received. Of these, 51% used vehicles for leisure journeys, 15% for business trips and 14% to connect to other transport. The main 'other' reason given was for shopping (10%) followed by medical trips (2%). The remaining 8% were mainly those who reiterated they had not used licensed vehicles, although one person said their trip was while their car was being repaired.

Our gender sample saw the right proportion of men (49% compared to 49% in the 2014 census estimate). Our age sample saw under-representation of the older group (29% compared to 36%), with an over-representation of the middle group – 43% compared to 37% in the census. We saw about the right level for the younger group surveyed (28% compared to 27%. This is a generally representative sample.

Conclusion

The on street surveys demonstrated there is still a high level of recent usage of licensed vehicles in Bath, although reduced from that in 2011, which was a very high level. The comment that 25% of people responding now use taxis less, to save money or because their circumstances have changed, is consistent with this. A high proportion still use ranks – 39% - and the level using hackney carriages is also increased by the fact the main company phoned has a good proportion of hackney carriages within its fleet. Hailing is not important at all.

Ranks are well known about, although those wanting new ranks mainly name locations where lesser used ranks already exist. Together with the comments about more use being made were more vehicles available, this suggests more usage of the lesser used ranks might lead to increased overall usage of hackney carriages in the area, particularly if other means of advertising the services available were used. The main company is also very active in encouraging electronic booking of their services.

People generally know how to complain if there are issues, and use a wide range of methods to do so. However, there is a concern that one in five say they do not feel any value in complaining – which suggests there could be suppressed feelings about issues people have although the general opinion of the overall service provided is very good.

5. Stakeholder Consultation

The following key stakeholders were contacted in line with the DfT Best Practice Guidance 2010:

- Supermarkets
- Hotels
- Hospital
- Pubwatch / night clubs
- Disability representatives
- Police
- Rail operators
- Other council contacts
- County council contacts

Specific comments have been aggregated below to provide an overall appreciation of the current situation, although in some cases comments are specific to the needs of a particular stakeholder. It should be noted that the comments contained in this Chapter are the views of those consulted, and not that of the authors of this Report. **Appendix 2** provides further details of those consulted.

The licensed vehicle trade consultation is the subject of the following chapter.

Supermarkets

Three supermarkets were contacted. All confirmed that there was significant use of licensed vehicles by their customers, with all having freephones to a company. Some said that customers used their own mobile phones to contact their preferred company, or that they used the payphone at the store exit to phone. None had received any complaints, and apart from busy periods vehicles always seemed to be available when needed.

Hotels

Six hotels were contacted. All said their customers used taxis – some said they used them "quite a lot". All hotels would phone for a vehicle, and most had their preferred provider, although one hotel was near a rank and would send customers there if they could see a vehicle waiting. Another was opposite a rank but would phone for customers if they could see none waiting at the rank. None had any issue with the service provided and most said that vehicles were generally available unless the City was busy, but that people tended to expect to wait at such times in any event. One commented how poor the traffic conditions were around their building – and by default the rank. This did mean they often saw queues of people waiting there for taxis to arrive – hence why they then phoned a company for their customers.

Restaurants / Night venues

Eight restaurants were contacted. Four were not available. Two said customers used taxis and they contacted one company for their customers – in one case the owner had a good personal relationship with the company used and they always obtained good service. One other said customers made a little use of taxis and that the ones they phoned were always available. One other said they did not think their customers used taxis and had no provision in any event.

Three night clubs were contacted. One was currently out of use but said they had never been aware of any issues when they were operating. Another was near a rank and said customers nearly always were able to get a taxi to take them home from the rank. The third club did not respond.

Hospital

The Royal United Hospital told us they have a Freephone to a specific operator in reception, or that staff would call another company if a visitor asked them to. There had been no reported issues or problems with availability or the service provided.

Police

A representative of Avon and Somerset Police told us that the overall view was that current vehicle numbers were generally balanced. There were some officers who suggested there was need for more vehicles whilst others said there were too many. They also confirmed that Manvers Street was very congested most days from 15:00 to 18:30, and particularly hindering egress from the railway station. They also felt that the marshals had improved the level of service at the Abbey rank, potentially increasing the number of people that could be handled there with the same number of vehicles.

A British Transport Police contact was approached but did not provide any response.

Disability representatives

Seven groups representing various societies including disability groups were contacted. One contact was no longer available whilst no other response was received despite a number of attempts being made to encourage input to the consultation.

University representatives

Contact was made with both universities in the B&NES area. A representative from Bath University obtained comments from students and provided a summary of common themes from their responses. They told us a concern was that prices for extra baggage varied massively 'based on the drivers' mood'. Most also felt it would be useful to have taxis available on the campus by the main bus stop at peak times (5-7 pm Monday, Tuesday, Thursday and Friday and 9-11 pm some evenings) – for when the buses are too crowded and groups of students are in a hurry. No response was obtained from Bath Spa University.

Other Council representatives

A representative from the Passenger Transport Team told us that to date they had not experienced problems with finding sufficient taxi availability for their home to school and social services work. The only exception is there are not enough wheel chair accessible vehicles available. They asked that the limit be increased to allow more such vehicles, or some other way be found to encourage the trade to make such provision within their fleets.

A representative from the B&NES spatial planning policy team told us they felt there was nothing with relation to hackney carriage and private hire policy within their area of responsibility. The current Core Strategy provides broad proposals for floorspace developments over the next 15 years whilst more detail is provided in the Placemaking Plan (see further detail in Chapter 2 under the policy section).

A member of the Public Transport Team had no views regarding hackney carriage and private hire services.

Input from the taxi marshals appointed by B&NES is provided in Chapter 3 above.

Other representatives

A representative from the Bath Business Improvement District (BID) told us they felt that taxis were integral to the visitor experience. They believe that differentiation and good customer service play a large part in consumer impression of a place. Their view was that despite Bath being a world heritage city they felt the local taxis had no brand. They told us 'when you go to London you know a hackney carriage is black, in Bristol they are blue, and in New York yellow".

The Federation of Small Businesses told us they felt there was little need or ability to hail hackney carriages in Bath, with the ranks being a good place for people to meet vehicles. They would welcome an increase in the number of private hire companies, finding it easier to get a 'taxi' from a rank rather than from making a phonecall. Recently they had received some comments about poor customer service from drivers, particularly at the station, although this was not their personal view.

Some 27 Bath Resident Association representatives were contacted. One was no longer available and two representatives responded saying they would ask their groups for response. No further response was obtained.

Bath Tourism Plus were contacted but did not respond.

Rail Operators

National statistics are publicly available showing the total number of entries and exits at each rail station in the United Kingdom. These numbers are calculated using ticket barrier and ticket issue information from ticket sales. The Table below shows information from 1997/1998 to date. The figures after the station name show the position in rank in terms of usage of English, Welsh and Scottish railway stations, with the smallest usage being the 2,533rd station and the highest being 1st in the list (Waterloo, London). Within the B&NES area there are four stations. Bath Spa is by far the busiest, with over 5.7m passengers in the last available year of statistics (ending April 2013). This places it the 65th busiest station.
Keynsham is the 1,076th busiest station with some 329,274 entries and exits, followed by Oldfield Park (1,156th with 281,622) and finally Freshford at 2,003rd with 39,160. The train taxi internet guide suggests that Bath Spa is the only one with a rank, but also giving three operators who could be phoned – one of whom claims wheel chair accessible vehicles. None of the other three stations are suggested as having ranks or booking offices, with the operator list for Oldfield Park the same as that for Bath Spa. Keynsham has three operators suggested whilst Freshford passengers needing a link are advised to used Bradford on Avon instead.

Rail year (ends March in last year noted)	Entries / exits	Growth / decline
Bath Spa (65th)		
1997 / 1998	2,681,441	n/a
2009 / 2010	4,779,480	
2010 / 2011	5,217,954	
2011 / 2012	5,681,252	
2012 / 2013	5,757,880	+1% (+115% overall)
Last three years (09/10 to 12/13)		+20%

Rail year (ends March in last year noted)	Entries / exits	Growth / decline
Keynsham (1,076th)		
1997 / 1998	102,253	n/a
2009 / 2010	249,842	
2010 / 2011	278,850	
2011 / 2012	306,276	
2012 / 2013	329,274	+8% (+222% overall)
Last three years (09/10 to 12/13)		+32%

Rail year (ends March in last year noted)	Entries / exits	Growth / decline
Oldfield Park (1,156th)		
1997 / 1998	111,442	n/a
2009 / 2010	216,750	
2010 / 2011	239,576	
2011 / 2012	252,934	
2012 / 2013	281,622	+11% (+153% overall)
Last three years (09/10 to 12/13)		+30%

Rail year (ends March in last year noted)	Entries / exits	Growth / decline
Freshford (2003rd)		
1997 / 1998	18,255	n/a
2009 / 2010	30,796	
2010 / 2011	33,456	
2011 / 2012	37,280	
2012 / 2013	39,160	+5% (+114% overall)
Last three years (09/10 to 12/13)		+27%

Since the 2011 survey Bath Spa has seen around 20% growth in a three year period, although growth in the last year available was less (just 1%). Since records began (a period equal to the statistics for private hire numbers) entries and exits at Bath Spa have increased by 115%, ie more than doubled.

Freshford has seen similar growth to Bath Spa overall, Oldfield Park has seen more growth (153%) and Keynsham some 222%. All saw growth last year of 5-11% and last three year growth of around 30%. None have seen any move to having active ranks with such relatively low flows.

6. Licensed Vehicle Trade Consultation

Trade consultation

A letter was issued to all licensed drivers by the Council inviting them to complete a questionnaire about their current service to the public, and their views on the policy of limiting hackney carriage numbers. This letter was issued to all current drivers (including those in the private hire trade to cover Best Practise Guidance requirements). B&NES operates a 'dual driver' licensing system, so it is not possible to differentiate those using hackney carriage vehicles, nor is it clear which area people operate in if they are hackney carriage owners. We were however advised that issue to all drivers would cover all owners as well, with no owners who did not also have a driving licence. All responses were returned to CTS using a freepost address provided by CTS.

Some 27 responses were received (4%), a fair response for this type of survey. 52% were from hackney carriage drivers and the remaining 48% from those who said they drove private hire vehicles. 81% owned and drove their own vehicles. 30% said someone else drove their vehicle. 56% of respondents said they operated on a radio circuit whilst 44% did not. This appears to be an increase from 2008 when the driver survey suggested 45% of journeys from bookings (albeit a slightly different question).

60% of those responding told us which companies they operated for. Of these, 44% were for the same largest company most people quoted, the next largest company had 25%, another company had 19% and two other companies 6% each.

Those responding had, on average, been involved with the licensed vehicle trade as drivers for 10 years (but ranging from six months to 30 years). They tended to work 6 days per week for an average of 50 hours per week. The range of days worked was between 4 and 7. The range of hours was from 10 to 80.

Drivers provided the days and hours that they operated. Both hackney carriage and private hire cover all periods of the week between the responses received. From the responses, most vehicles are operating between 1300 and 2000, with Wednesday, Thursday and Friday being the busiest days for that period. Few vehicles operate overnight in the early hours of Tuesday and Wednesday, with the highest number operating the early hours of Sunday morning. There appear to be more hackney carriages generally active in the daytime period than private hire, but otherwise activity levels are fairly similar. The main exception appears to be a much higher activity level for hackney carriages over Saturday night / Sunday morning. Overall, this coverage is very good.

Those operating hackney carriages told us the ranks they used. 13 drivers responded to this question (those that were hackney carriage). One responded 'Midsomer Norton'. One only served the station, and one only served the Abbey. Of those giving us ranks, 69% served both the Abbey and the station, 38% serviced the Abbey, station and at least one other rank. Westgate Buildings was mentioned by 23%, George Street by 15% and Southgate by a single driver. This confirms the continued focus on the two main ranks, but that some other ranks are actively serviced by the fleet.

In terms of the limit policy, 81% said the current policy of limiting remained relevant and 15% said it did not. Just one person (4%) did not respond. 26% did not respond to the question of what their reaction to removal of the limit would be and a further 26% said they would not have any reaction were the limit removed. 30% would leave the trade, 11% would work longer hours and 7% would transfer to hackney carriage operation. One person made it clear they would leave the trade if they could but felt there were no other suitable jobs for them.

Many comments were made. In terms of retaining the limit, many felt this improved the service to the public by keeping standards higher than they would be were more vehicles to exist. Were there more vehicles, the money available for maintenance, etc would further reduce. There were concerns about the impact of congestion were more hackney carriages available. There were contrary views from some in the private hire trade – and as usual for these studies some calls for restraining the number of private hire vehicles as well. One person pointed out that some passengers had to wait at the station when the vehicles with the additional permit were all engaged whilst other vehicles were unable to stop to collect people left waiting there – there was no reasonable place near the station they could safely stop in such circumstances, but they did not feel able to afford the additional fee.

The person from the outer (unlimited) zone took time to explain their need for a number of ranks in that area, including better enforcement of the ranks that do exist but are abused by private vehicles. They were concerned that more zone 1 vehicles would impact on their area additionally but did not explain how this might occur.

7. Responses to DfT Best Practice Guidance 2010

Annex A of the Best Practice Guidance (BPG) provides a list of useful questions to help assess the issue of quantity controls of hackney carriage licences.

This chapter takes the form of a response to each question based on the evidence identified earlier in this report. BPG questions are shown in ***bold italic*** with responses following in normal type.

Have you considered the Government's view that quantity control should be removed unless a specific case that such controls benefit the consumer can be made?

Yes, this report is the independent input to this consideration on behalf of B&NES.

Questions relating to the policy of controlling numbers:
Have you recently reviewed the need for your policy of quantity controls?
Yes, this report forms a current review of the need for the policy of quantity control of hackney carriages at this point in time in the Council area.

What form did the review of your policy of quantity controls take?
This current review follows the DfT Best Practise Guidance April 2010 in undertaking a full review of the current situation in regard to the policy towards hackney carriage vehicle limits. It includes:

- A review of the background policies of the Council
- A rank survey program to identify current demand and supply
- Public consultation with people in the streets of Bath
- Stakeholder consultation with all groups recommended by the DfT Best Practice Guidance as far as people were available
- consultation by email or phone with several key stakeholders
- a questionnaire posted to all licensed drivers in the area by the Council (to cover data protection issues)
- Consideration of the relevant section of the Equality Act

Who was involved in the review?
This review was undertaken by an independent consultant and included direct discussion with the following respondents:

- Local supermarkets
- Hotels in the area
- restaurants
- Night venues
- The police
- Some other key stakeholders as listed above

What decision was reached about retaining or removing quantity controls?
The decision regarding quantity controls is the subject of the final chapter, but is also a matter for decision by the committee appointed to make such decisions on behalf of the Council.

Are you satisfied that your policy justifies restricting entry to the trade?
Please see the summary and conclusions section for guidance on conclusions from our review – ultimately this decision is for the local council to make.

Are you satisfied that quantity controls do not:
- ***Reduce the availability of taxis***
- ***Increase waiting times for consumers***
- ***Reduce choice and safety for consumers***

There appears to be some evidence that there is a current shortage of vehicles given recent growth in passenger numbers across the City. However, the survey statistics also demonstrate that overall passenger waiting times have reduced since the last survey despite this increase in demand. The proportion of passengers in hours with delays over a minute has also reduced since 2011 though this value has increased since 2008.

What special circumstances justify retention of quantity controls?

This issue is ultimately for the Councillors to conclude. However, there is very limited space to increase provision at the two main ranks which see both passengers and vehicles and with congestion issues already severe any additional vehicles could exacerbate this and have severe impacts on the historic core and potentially affect visitor numbers as people find it harder to get to the City. With the present apparent surge in the local economy, any wholesale removal of the limit could encourage many to choose to obtain hackney carriages which almost certainly would lead to congestion issues.

How does your policy benefit consumers, particularly in remote rural areas?

The present limit policy also sees a zoning policy retained which encourages provision of hackney carriages in the smaller urban areas of B&NES. City vehicles focus on providing for those wishing to travel from the main urban centre, allowing private hire companies to be available for those needing services in more rural areas. Between these two policies a better provision is made for rural areas than if all vehicles were allowed full access to the honey pot city centre ranks.

How does your policy benefit the trade?

Retention of a limit on hackney carriage vehicle numbers provides some additional value to a hackney carriage plate which enables more to be invested in the vehicle and the service it provides than if the vehicle had no additional value. It also keeps the fleet stable and encourages drivers to build relationships with regular customers as well as enabling them to keep their vehicles well maintained from a more guaranteed level of income than if vehicle numbers were variable.

If you have a local accessibility policy, how does this fit with restricting taxi licences?

At present, any new vehicles would have to be wheel chair accessible and the present policy reduces the potential for people to seek to cut costs by replacing more expensive WAV style vehicles with less costly saloon style.

Questions relating to setting the number of taxi licences:

When did you last assess unmet demand?

This study was preceded by regular earlier ones. Some studies have identified unmet demand which was found to be significant with new licences added (such as in 2008) whilst others (2005 and 2011) determined there was no significant unmet demand and no more licences were required.

How is your taxi limit assessed?

In all previous studies, and in this one, the limit has been assessed using industry standard techniques.

Have you considered latent demand, ie potential customers who would use taxis if more were available, but currently do not?
Yes, latent demand was considered by several methods, with the key method being through interviews with members of the public. Latent demand levels were found to be moderate with a factor of 1.16 for those having given up waiting for hackney carriages at City ranks.

Are you satisfied that your limit is set at the correct level?
This is a matter for decision by the Council committee based on evidence following in our summary. With various pointers suggesting there may be unmet demand which is significant at this time, further licences are needed and the estimation of numbers needed is outlined below.

How does the need for adequate taxi ranks affect your policy of quantity controls?
As discussed above, the two most popular ranks are in locations where it would be very hard to provide additional rank space. Other ranks are provided, some of which are developing and others of which are not used by vehicles or passengers. Some of these are being removed with the high pressure on roadspace in the historic City core. Other ranks which are developing or used to lesser extents also have the most spaces already provided. It is therefore unlikely that more spaces can be provided but there are also no potential locations that customers would like to see ranks at present.

Questions relating to consultation and other public transport service provision:

When consulting, have you included all those working in the market, consumer and passenger (including disabled groups), groups which represent those passengers with special needs, local interest groups, e.g. hospitals or visitor attractions, the police, a wide range of transport stakeholders, e.g. rail/bus/coach providers and traffic managers?
See above, yes, all appropriate consultees have been taken into account.

Do you receive representations about taxi availability?
No

What is the level of service currently available to consumers including other public transport modes?
Local bus and rail services are very good, including park and ride services around the boundaries of the City to reduce pressure on city parking, which is very high. However, whilst there are night bus services most are run on commercial lines and are therefore restricted.

8. The Equality Act 2010

Whilst several sections of the Equality Act (EA) affect licensed vehicle operations, the key provision relevant to this report is the requirement under section 161 that any authority with a limit on the number of hackney carriage vehicle licences should issue licences to wheel chair accessible vehicles (WAV) until an agreed percentage of the fleet were such WAV style. The last guidance in regard to timescales for introduction of this regulation saw consultation occurring around this point in time – although nothing has yet been issued by the Department for Transport. B&NES currently has a limit on the city zone and this section of the Act would apply if ever enacted.

The Equality Act is national legislation which cannot be amended by the Council or its officers. Current thought suggests that the required proportion of WAV style vehicles expected for the Council area might be of the order of 35%. At the present time, the city zone has about 15% of its vehicles wheel chair accessible. Much of this provision has come from plate issues, with any new licences having to be wheel chair accessible (with a fairly wide range of vehicles allowed).

The table below presents some of the options available based on these figures.

Option	Total number of vehicles	Number of wheel chair accessible vehicles (WAV)	Percentage of fleet that are WAV
Current	122	18	15%
EA requirement	122	43	35%
Meet EA by removing limit but no WAV stipulation	122 upwards	Uncertain – might reduce	Uncertain
Meet EA by removing limit but with all new vehicles having to be WAV	122 upwards	18 upwards with each new vehicles adding to number	At least 15%- an extra 0.8% for each new vehicle added
Meet EA by retaining limit at present no. of vehicles, those currently informally WAV become formal and 25 current vehicles converting	122	43	35%
Meet EA by granting plate to any WAV, with none of present converting under limited scenario.	160 (+31%)	56	35%

At the present time, there is a small level of significant unmet demand. However, the level of new licences is not yet confirmed and we have undertaken our estimates for EA based on the current level of 122 vehicles in the city zone.

The worst case scenario would be if none of the vehicles were willing to become WAV style. In this case, 38 further licences could be issued before the expected criteria was met. These additional vehicles increase the fleet by some 31% which would almost certainly lead to significant reduction in income for the current fleet and would more than extinguish any present significance of unmet demand.

Further discussion of this issue is included in the final chapters in context of the full survey.

9. Summary and conclusions

Policy Background

B&NES is a unitary authority and has full transport and highway powers alongside those for licensed vehicles. The latest Local Transport Plan is, however, joint with three other nearby local councils, was refreshed in 2013 and currently runs from 2011 up to 2026. The Public Transport Supplementary Document covers taxi strategy (para 1.10) and seeks that "taxis and private hire vehicles complement and reinforce other public transport services". Rank location, design and information are important, together with upgrading fleets and training and integration with other modes.

B&NES has long restricted hackney carriage vehicle numbers, but only for the Bath City zone. All licensed vehicle policy and conditions were reviewed recently with the new set ratified in January 2014. Any WAV has to be purpose built and any such licences have a special condition that any replacement vehicle must be of the same or higher standard.

Statistical Background

At the time of writing this report there were 122 hackney carriages in the Bath city zone and 31 in the outer area. These were supplemented by 334 private hire vehicles covering the full licensing area. There were 627 drivers all able to drive any of the vehicles in the area and 95 private hire operators registered.

Vehicle numbers have grown by 88% since 1997 (private hire), 59% for total hackney carriages (since 1994) and 37% for the City zone hackney carriages (from 1994). Current private hire numbers are at their lowest level since 2007 and have been falling since the peak reached in 2010.

Current hackney carriage vehicle numbers for the total area are just less than the average for the Avon authorities and slightly further less than the English average excluding London. Two other similar tourist areas also with limited vehicle numbers have very similar levels to B&NES. The level of WAV in the City fleet is around 15% and sees B&NES with the highest Avon level of such vehicles apart from Bristol which is fully WAV.

The current fleet driver ratio is 1.29 suggesting some double shifting although it is not possible to present this number split by hackney carriage and private hire. Fares appear high although this also appears to be partly a characteristic of hackney carriage services in tourist areas.

Rank Survey results

127 hours of observation were undertaken at all active ranks in the B&NES city zone, including some lesser used ranks. Ranks soon to be removed as well as some proven to be unused were not observed directly, although all sites were visited during the course of the survey.

Just one person was observed accessing a hackney carriage at a rank in a wheel chair, although a good number of others were clearly assisted into vehicles by drivers.

In 2014 the principal two ranks remain those at Abbey and at Bath Spa Station. The Abbey was most active in terms of active use and hours operated although the Station had marginally the highest average per hour usage. Westgate, George St and Southgate St all were mainly used at night.

Overall service to ranks was counted as 'good' at George St and Southgate St where lower levels of demand were well met. The two main ranks are so busy that queueing occurred such that service could only be defined as 'fair' and vehicle service seemed to see regular mismatch to passenger requirements.

Compared to between 2008 and 2011 when there was apparently a fall in overall rank demand, the period from 2011 to 2014 appears to have seen significant growth at every rank. Two new ranks have successfully been introduced although the top two ranks have retained their same share of passengers from 2008 to date (92%). Since 2008 the new shopping centre near the rail and bus station has fully opened, which may account for some of the growth. In 2014 (as in 2011, but not as in 2008), demand in the area is peaky.

The current estimate of annual usage of hackney carriages from ranks and hailing is 915,798 passengers per year.

75% of all city vehicles were observed during a sample survey with 23% only seen near the station, 37% near both locations and 40% only near the Abbey. Of the observations 30% were daytime, 48% evening and 22% in early hours.

A review of the marshal data confirmed that our rank data provided similar levels of patronage to the independently collected marshal data. The marshals also told us the 02:00 to 03:00 hour on a Saturday is the busiest and the one with longest waiting times by passengers.

A review of the marshal data since it began to be collected demonstrated our survey weekend to have seen 95% of the October average passenger flows at the Abbey rank between 23:00 and 04:00 on Thursdays, Fridays and Saturdays. For these hours, the survey weekend was about 25% higher than the all-year average. Comparing data for each October available, 2012 had the highest flows followed by 2013 and then this year with 31% growth between 2013 and 2014. The two November averages saw 37% growth from 2013 to 2014.

The ISUD index suggests there is unmet demand for hackney carriages which is significant based on the survey data collected in 2014, with a value of 118, beyond the accepted cut-off value of 80, although a sensitivity test suggests a value of 53, below the cut-off.

Public Consultation

The public consultation focussed on those living in the B&NES area since it was considered that tourist views would preclude understanding the needs of local people who made much more regular use of the hackney carriage service. 57% had used a licensed vehicle in B&NES in the last three months – a fall from the 90% in 2011. Estimates of usage of licensed vehicles are 2.7 person trips per month, falling to 0.5 for hackney carriages.

62% got licensed vehicles by phone with 38% from ranks and at this time none from hailing. Of those phoning, just five companies were named with the largest company taking 70% of mentions and the second largest company 27%. This suggests little competition in the area for those booking by phone. Westgate and Henry St were also mentioned, as was Queen Square although none said they used that location.

A good knowledge of ranks was found, with the most frequent quoted being the Station followed by the Abbey rank. There was a relatively high requirement for new ranks but all actually have ranks there – suggesting need for better advertisement of the lesser used ranks.

Whilst just under a third told us they had no issue with the hackney carriage service, 21% told us the issues they had. The highest level of response was delay getting a taxi followed by rank position and driver issues (almost equal). In terms of what would make people use licensed vehicles more, lower cost as usual came out highest. 22% said they would use more were more available by phone and 16% said more available at ranks.

When asked about need for WAV style vehicles most had no requirement but those that did (or who knew someone who did) split between those needing WAV style and those needing other adaptations, giving support to the current policy of a mixed fleet.

Latent demand for the survey was 16% with equal amounts of people giving up waiting at the Abbey and Station ranks.

People generally knew how to complain about issues – with 30% saying they would contact the council and 23% contacting the driver.

25% of people said they used licensed vehicles less in 2014 than in 2011 – half of these due to cost and 39% because their circumstances had reduced their need for car usage. 51% of users of licensed vehicles did so for leisure purposes, 15% for business and 14% to connect to other transport.

In summary there remains a high level of recent usage of licensed vehicles in Bath although reduced from 2011. 39% use ranks and the proportion of trips made by hackney carriages is increased by the fact many are part of the larger private hire company fleets. Better advertising of lesser used ranks might increase overall hackney carriage usage.

Stakeholder Consultation

A good range of stakeholder response was obtained. Supermarkets were effectively serviced by private hire company links and saw significant use of licensed vehicles by customers. All hotels also said their customers used a lot of taxis, with two seeing customers use the nearby rank. Most restaurants phoned taxis for customers when required. One night clubs said its customers used the nearby rank and always managed to get home from there. The hospital is serviced by private hire.

The police view was that current vehicle numbers were balanced. They felt the marshals had improved the night service and increased the level of people who could be taken away by the same number of vehicles.

There was no input from disability organisations despite significant attempts to obtain feedback. One of the two universities reported issues with varying charges and said a rank near the main university bus stop might be used.

Those from the Council needing to use licensed vehicles generally could get enough for contracts but struggled to get sufficient WAV style vehicles. Other council departments responded that they had no relevant comment to make.

Bath BID would prefer vehicles to have a stronger brand but made no other comment. The Federation of Small Businesses would prefer to see more private hire companies and more vehicles available by phone but felt rank provision was sufficient. Other groups did not respond despite some acknowledging the request and promising to gather response.

Bath Spa is the 65th largest station in the latest national station usage figures – with some 5.7m entries and exits in the year to April 2013. None of the other three stations in the BNES area support ranks and one has no recommended private hire links available in the Traintaxi guide.

Bath Spa station patronage has grown 20% over the last three periods available, and by 115% since records began in 1997.

Trade Consultation

All drivers were sent a letter and questionnaire. 4% responded – a fair response. There was an almost even split between hackney carriage and private hire responses. 56% operated on a radio circuit and 81% owned and drove their own vehicles.

Average driver experience was 10 years, working six days and an average of 50 hours per week. Most vehicles operate 1300-2000 Wednesdays, Thursdays and Fridays. The highest number operates the early hours of Sunday morning, when more hackney carriages tend to be active. The overall coverage is very good.

69% served both Abbey and Station ranks. Westgate, George St and Southgate St were all mentioned as being serviced by those responding. 81% said the limit remained relevant. Less responded to their reaction were the limit to be removed – with 30% saying they would leave the trade and 11% would work longer. Many gave reasons the limit should be retained in terms of benefits to passengers. There were concerns that more vehicles would reduce the funds available for maintenance and that increase over-ranking would result.

Equality Act

The Equality Act is already on the statute books. There is a requirement that any authority with a limit on its number of hackney carriages should ensure no new entrant is refused entry if they are offering a wheel chair accessible vehicle if a given proportion of vehicles has not been achieved. At the present time, the level of WAV required in a fixed fleet has not been determined, and there is still no confirmed date for the consultation required to allow this to move forward.

The recent Law Commission Review may reduce any desire by Government to spend time resolving this Act. There is no way set out in legislation that any Council can require a particular level of WAV within the private hire fleet. We do not believe there are any other statutory requirements on national or local government beyond the Equality Act which require present action.

At the present time, there is no way that any authority without a limit on hackney carriage vehicle numbers can encourage an increase in the number of WAV style hackney carriages, apart perhaps from the introduction of a mandatory order requiring all vehicles to be wheel chair accessible (which would most likely be opposed by those seeking the spirit of the EA since current thinking is a mixed fleet is generally better for those with a range of disabilities).

A range of options are open to Bath and North East Somerset were this section of the Act to be put in place. The preferable option, if required, would be for current vehicles to change to wheel chair accessible style, not requiring any addition to the fleet size.

This is preferable to the worst case scenario where some 38 new licences would have to be issued to meet the expected proportion, inflating the overall fleet numbers by 31%, which would have an impact on current vehicles and would almost certainly lead to over-ranking issues.

Best Practice Guidance

A review of the questions posed in the BPG was undertaken and is presented in an earlier Chapter. This review has been consistent with the requirements of the BPG.

Synthesis and Conclusions

There is a significant determined background context to this current review which seeks to conclude if the council can continue to defend its policy of limiting the number of hackney carriage vehicles in the City zone. Taxis are clearly accepted as a key part of public transport in the area and much of the detail of hackney carriage and private hire licensing policy was recently reviewed and accepted in January 2014. This policy includes continuing the two zone system and also sets the parameters for when and what wheel chair accessible vehicles are accepted within the fleet. Such vehicles can be added to both the private hire and the non-City zone fleet at any time, but once added must remain equivalent or more accessible vehicles.

It appears from our research that 2011 was a low point in demand for hackney carriages from ranks in the City zone which has now been more than overturned. This more recent growth appears to be related to the completion of the Southgate shopping centre and full opening of the facilities there. The national rail statistics also show 20% growth between the latest year and three years prior in entries and exits at the station. Marshal data suggests 31-37% growth since 2013 for the peak weekend hours between 2013 and 2014. This growth has applied at all active ranks although the dominance of the two main ranks has not changed at all between any of the last three studies. Our survey appeared to be around about average for the time of year and not at an extreme peak within that month. It appears that a good proportion of the fleet were working at the time of the survey – suggesting there is relatively little spare capacity in the current fleet. Further, traffic congestion is reducing the current ability of the present fleet to operate as effectively, particularly at times when demand increases.

Private hire vehicle numbers (not limited and therefore governed by market forces) are presently reducing although their growth since 2007 is still higher than that for city-zone hackney carriage numbers which have seen several plate number increases over the years of limitation. There is some evidence that more hackney carriages are working on private hire circuits than in 2008, which may be balancing up the reduction in private hire licences (and increasing their flexibility in being able to work ranks if needed). Further, public perception of what is a hackney carriage and what is private hire is eroded by the fact that most publicly facing private hire vehicles also operate on meters.

Public response suggests that people feel there is a shortage of private hire and hackney carriage and that better advertised ranks might increase usage – though in counter to this a quarter of people (who were mainly local residents) had reduced their used of licensed vehicles since 2011. One council department would prefer more wheel chair accessible vehicles to meet contracts but there is no similar requirement from the general public. Were the Equality Act section ever to be applied, the level of WAV is too low although the actual level is higher than any other non-fully-WAV authority in the Avon area.

It is also appreciated that most people with disabilities either tend to have their own provision (often through motability schemes) or if able will use the relatively highly accessible local bus transport system. Even if people use licensed vehicles, they tend to make phone calls rather than risk turning up at ranks. This national situation tends to a relatively low usage of hackney carriages by those with disabilities unless the fleet is fully wheel chair accessible or highly available by telephone, neither being true for the Bath fleet. Neither is likely to occur for Bath.

Since 2008 demand at night has increased and become peakier. The introduction of the marshals has improved service at peak times, but may have also perversely increased the demand further. There is some evidence that more vehicles would improve service further at this time although it is also true that the ISUD components suggest overall there is better service at peak times (whenever they occur) than there was in 2011. The change which has pushed the index over the threshold relates to incidences of queueing during the daytime.

On balance, the evidence suggests that there is significant unmet demand for the service of hackney carriages in the Bath city zone at this current time although this at a relatively low level. The key driver towards need for more vehicles from the index is the shortage during the working week Monday to Friday, which may be partly related to congestion impacts on the ability of the fleet to meet need. However, there remains need to keep levels of service to customers high to ensure the continued viability of the hackney carriage industry itself as well as ensuring the economy of Bath is not restrained by any lack of available transport.

There are a number of ways that the number of extra licences needed to restore a level where there is no unmet demand which is significant. This depends on the parts of the index where there is indication there is the main impact. In this survey the pointer suggests that the issue is not focussed on any of the peaks in demand, although there is some contribution from the level of passengers waiting over a minute on average. It is therefore more difficult to identify the overall level required although it is clear the significance of the unmet demand is not far beyond that which is viewed as the cut-off, and that the sensitivity test brings the value below the cut-off level.

In 2008 9 licences were recommended based on an index of 138 – our survey suggests a value no more than 118 and perhaps below the level of significance at 53 – so on balance our judgement suggests that a further three licences would cover the identified issues of increased demand and reduced ability to service through congestion. This would allow the committee to retain the limit on vehicle numbers for the Bath city zone and defend this in court with the extra licences if challenged. The current reduction in the private hire fleet suggests demand in Bath is not particularly buoyant hence the conservative suggestion on the increase.

10. Recommendations

Limits on the number of hackney carriage vehicles

With there being evidence for there being unmet demand which is significant at this point in time, we would recommend a further three Bath City licences be issued. This would allow the Council to retain the limit on vehicle numbers and withstand any challenge forthcoming, although with the extra licences needing time to be issued and take effect, it would not be clear for around a year if the additional licences had provided the desired effect or not. There will also be a spin off that the extra licences will increase the Bath city zone level of WAV to 17% and allow more to be available for contracts.

At the present time, it would not be tenable to retain the current limit without issuing further licences as the maximum ISUD calculation is beyond the accepted cut-off limit, and even the sensitivity test is not too far below that limit.

The Council also has the option of removing the limit on numbers of licences in the Bath city zone. However, we would advise that this would not be a choice in the current public interest since:

- With the current suggestion of some level of recovery in Bath, any more than the limited issue of licences would encourage a high take-up of new licences on the speculation that there was demand to be met
- The public would be strongly inconvenienced by the impact of additional vehicles on congestion around all ranks in the city which could be severe and could not be controlled easily
- There is benefit to the public from the current stability provided by the presence of a long term limit on vehicle numbers
- The issue of more licences would reduce the current trade focus on customers as they sought to maintain their earning levels by focussing on taking as much custom as possible
- Removal of the limit would mean many of those with significant levels of passenger expertise and knowledge could leave the trade – which may even reduce the level of wheel chair accessible vehicles if an owner of one of these chose to leave.

Rank provision

There is no need for any further rank provision in the Bath city zone at this time. However, there is need to consider if the appropriate sections of the Council could improve signing and advertising of the lesser used ranks. This may need discussion between the licensing section and the council department responsible for both highways and for information both on the ground and on the internet.

Future review of hackney carriage demand

The marshal data is a good source for observing future growth of hackney carriage demand at the point where unmet demand would usually become significant. The licensing section should continue to receive information from the marshals on a monthly basis and review growth to identify if there is further evidence of significant growth. Were there to be 40% or more average growth comparing a current month with the same month in the previous year, or if the moving average from the three day statistics were to grow by more than 50%, a further limited test of demand and supply should be considered.

Other than this, the next survey of demand should occur with rank surveys in October 2017, unless any revision of law or practise should occur before that time.

Appendix 1 – Rank Observation Details

Survey	Date	Hour	No of Vehicle Arrivals	Total Passenger Departures	Loaded Vehicle Departures	Empty Vehicle Departures	% of vehicles leaving empty	Total Vehicle Departures	Average Vehicle Waiting Time	Average Vehicle Waiting Time (for a fare)	Maximum Vehicle Waiting Time (for a fare)	Average Passenger Waiting Time in Hour	Average Passenger Waiting Time, those waiting only	Number of people waiting 1-5 mins	Number of people waiting 6-10 mins	Number waiting 11 mins or more	Maximum passenger wait time
Abbey Fri	10/10/2014	8	3	0	0	0	0%	0	00:19:00	00:22:00	00:37:00						
Abbey Fri	10/10/2014	9	10	5	5	6	55%	11	00:14:24	00:11:00	00:23:00						
Abbey Fri	10/10/2014	10	16	15	12	5	29%	17	00:02:11	00:01:55	00:12:00	00:01:48	00:03:51	7	0	0	00:05:00
Abbey Fri	10/10/2014	11	10	8	8	3	27%	11	00:24:54	00:29:08	00:49:00						
Abbey Fri	10/10/2014	12	17	14	11	2	15%	13	00:12:07	00:12:24	00:25:00						
Abbey Fri	10/10/2014	13	16	21	17	1	6%	18	00:08:45	00:08:40	00:17:00						
Abbey Fri	10/10/2014	14	20	11	8	6	43%	14	00:17:09	00:19:49	00:33:00						
Abbey Fri	10/10/2014	15	32	33	26	6	19%	32	00:12:01	00:12:47	00:17:00						
Abbey Fri	10/10/2014	16	29	44	29	6	17%	35	00:06:45	00:06:57	00:16:00	00:00:12	00:01:48	5	0	0	00:02:00
Abbey Fri	10/10/2014	17	38	51	35	2	5%	37	00:05:41	00:05:48	00:12:00	00:00:05	00:01:40	3	0	0	00:02:00
Abbey Fri	10/10/2014	18	31	40	29	2	6%	31	00:04:58	00:05:16	00:11:00						
Abbey Fri	10/10/2014	19	27	33	23	3	12%	26	00:08:04	00:08:00	00:22:00	00:00:14	00:02:00	4	0	0	00:02:00
Abbey Fri	10/10/2014	20	30	48	27	2	7%	29	00:08:04	00:08:18	00:15:00						
Abbey Fri	10/10/2014	21	45	69	42	4	9%	46	00:08:14	00:08:36	00:17:00						
Abbey Fri	10/10/2014	22	44	79	44	0	0%	44	00:08:24	00:08:24	00:17:00						
Abbey Fri	10/10/2014	23	74	142	73	3	4%	76	00:03:32	00:03:35	00:09:00						
Abbey Fri	11/10/2014	0	96	176	92	0	0%	92	00:01:34	00:01:34	00:07:00	00:00:33	00:01:27	68	0	0	00:03:00
Abbey Fri	11/10/2014	1	76	144	74	1	1%	75	00:03:21	00:03:23	00:09:00	00:00:15	00:01:56	19	0	0	00:04:00
Abbey Fri	11/10/2014	2	61	121	61	2	3%	63	00:05:31	00:05:37	00:12:00						
Abbey Fri	11/10/2014	3	35	73	33	2	6%	35	00:07:56	00:06:10	00:23:00						
Abbey Fri	11/10/2014	4	4	5	4	5	56%	9	00:06:30	00:02:00	00:05:00						
Abbey Fri	**10/10/2014**		**714**	**1132**	**653**	**61**	**9%**	**714**				**00:00:10**	**00:01:44**	**106**	**0**	**0**	**00:05:00**

Survey	Date	Hour	No of Vehicle Arrivals	Total Passenger Departures	Loaded Vehicle Departures	Empty Vehicle Departures	% of vehicles leaving empty	Total Vehicle Departures	Average Vehicle Waiting Time	Average Vehicle Waiting Time (for a fare)	Maximum Vehicle Waiting Time (for a fare)	Average Passenger Waiting Time in Hour	Average Passenger Waiting Time, those waiting only	Number of people waiting 1-5 mins	Number of people waiting 6-10 mins	Number waiting 11 mins or more	Maximum passenger wait time
Abbey Sat	11/10/2014	5	0	1	1	0	0%	1	00:00:00	00:00:00	00:00:00						
Abbey Sat	11/10/2014	6	1	0	0	1	100%	1	00:01:00	00:00:00	00:00:00						
Abbey Sat	11/10/2014	7	0	0	0	0	0%	0	00:00:00	00:00:00	00:00:00						
Abbey Sat	11/10/2014	8	2	0	0	2	100%	2	00:01:30	00:00:00	00:00:00						
Abbey Sat	11/10/2014	9	3	3	3	0	0%	3	00:04:00	00:04:00	00:06:00	00:00:40	00:02:00	1	0	0	00:02:00
Abbey Sat	11/10/2014	10	10	8	6	3	33%	9	00:05:00	00:06:00	00:19:00	00:00:15	00:02:00	1	0	0	00:02:00
Abbey Sat	11/10/2014	11	10	9	7	2	22%	9	00:02:48	00:02:40	00:10:00	00:02:33	00:03:50	4	2	0	00:07:00
Abbey Sat	11/10/2014	12	19	33	20	1	5%	21	00:02:31	00:02:23	00:11:00	00:00:45	00:02:16	11	0	0	00:05:00
Abbey Sat	11/10/2014	13	26	36	23	2	8%	25	00:02:25	00:02:30	00:06:00	00:00:10	00:01:30	4	0	0	00:02:00
Abbey Sat	11/10/2014	14	28	47	24	3	11%	27	00:04:00	00:04:09	00:08:00						
Abbey Sat	11/10/2014	15	38	80	39	1	3%	40	00:01:25	00:01:24	00:07:00	00:01:16	00:03:08	27	7	0	00:06:00
Abbey Sat	11/10/2014	16	44	85	41	1	2%	42	00:01:53	00:01:51	00:12:00	00:01:10	00:02:19	41	0	0	00:04:00
Abbey Sat	11/10/2014	17	35	81	36	1	3%	37	00:02:44	00:02:35	00:11:00	00:00:26	00:01:39	23	0	0	00:04:00
Abbey Sat	11/10/2014	18	31	55	27	4	13%	31	00:05:29	00:05:11	00:21:00	00:00:30	00:05:00	5	0	0	00:05:00
Abbey Sat	11/10/2014	19	36	41	25	4	14%	29	00:08:40	00:09:14	00:19:00						
Abbey Sat	11/10/2014	20	35	62	30	6	17%	36	00:07:42	00:08:05	00:18:00						
Abbey Sat	11/10/2014	21	45	82	42	1	2%	43	00:08:46	00:09:01	00:15:00						
Abbey Sat	11/10/2014	22	63	126	66	5	7%	71	00:04:35	00:04:42	00:12:00	00:00:04	00:01:40	6	0	0	00:02:00
Abbey Sat	11/10/2014	23	91	196	91	0	0%	91	00:00:06	00:00:06	00:01:00	00:01:13	00:01:43	142	0	0	00:05:00
Abbey Sat	12/10/2014	0	109	207	105	0	0%	105	00:00:52	00:00:52	00:05:00	00:01:28	00:01:54	154	0	0	00:04:00
Abbey Sat	12/10/2014	1	94	178	89	2	2%	91	00:02:22	00:02:21	00:07:00	00:00:37	00:01:52	60	0	0	00:04:00
Abbey Sat	12/10/2014	2	95	215	95	2	2%	97	00:01:42	00:01:41	00:06:00	00:00:35	00:02:24	52	0	0	00:04:00
Abbey Sat	12/10/2014	3	68	150	68	1	1%	69	00:01:48	00:00:55	00:03:00	00:00:54	00:02:24	56	1	0	00:06:00
Abbey Sat	12/10/2014	4	9	6	4	8	67%	12	00:13:20	00:17:12	00:26:00	00:01:00	00:06:00	0	1	0	00:06:00
Abbey Sat	**11/10/2014**		**892**	**1701**	**842**	**50**	**6%**	**892**				**00:00:43**	**00:02:03**	**587**	**11**	**0**	**00:07:00**

Survey	Date	Hour	No of Vehicle Arrivals	Total Passenger Departures	Loaded Vehicle Departures	Empty Vehicle Departures	% of vehicles leaving empty	Total Vehicle Departures	Average Vehicle Waiting Time	Average Vehicle Waiting Time (for a fare)	Maximum Vehicle Waiting Time (for a fare)	Average Passenger Waiting Time in Hour	Average Passenger Waiting Time, those waiting only	Number of people waiting 1-5 mins	Number of people waiting 6-10 mins	Number waiting 11 mins or more	Maximum passenger wait time
Westgate Fri	10/10/2014	16	1	0	0	0	0%	0	00:04:00	00:00:00	00:00:00						
Westgate Fri	10/10/2014	17	2	3	2	1	33%	3	00:18:30	00:18:30	00:19:00						
Westgate Fri	10/10/2014	18	4	6	4	0	0%	4	00:11:00	00:11:00	00:21:00	00:00:20	00:01:00	2	0	0	00:01:00
Westgate Fri	10/10/2014	19	3	2	2	1	33%	3	00:05:40	00:04:00	00:07:00	00:02:00	00:04:00	1	0	0	00:04:00
Westgate Fri	10/10/2014	20	11	18	10	1	9%	11	00:07:21	00:06:30	00:15:00						
Westgate Fri	10/10/2014	21	12	14	9	0	0%	9	00:02:35	00:02:35	00:07:00	00:01:34	00:05:30	2	2	0	00:07:00
Westgate Fri	10/10/2014	22	18	32	20	1	5%	21	00:02:43	00:02:49	00:07:00	00:00:16	00:02:15	3	1	0	00:06:00
Westgate Fri	10/10/2014	23	14	21	14	0	0%	14	00:00:21	00:00:21	00:02:00	00:03:02	00:05:35	4	8	0	00:09:00
Westgate Fri	11/10/2014	0	12	21	10	1	9%	11	00:02:25	00:02:27	00:09:00	00:00:30	00:10:00	0	1	0	00:10:00
Westgate Fri	11/10/2014	1	10	26	11	0	0%	11	00:00:42	00:00:42	00:02:00	00:00:04	00:01:00	2	0	0	00:01:00
Westgate Fri	11/10/2014	2	11	14	10	0	0%	10	00:01:16	00:01:16	00:05:00						
Westgate Fri	11/10/2014	3	5	7	3	2	40%	5	00:03:48	00:05:20	00:12:00						
Westgate Fri	11/10/2014	4	0	1	1	0	0%	1	00:00:00	00:00:00	00:00:00						
Westgate Fri	**10/10/2014**		**103**	**165**	**96**	**7**	**7%**	**103**				**00:00:42**	**00:04:28**	**14**	**12**	**0**	**00:10:00**

Survey	Date	Hour	No of Vehicle Arrivals	Total Passenger Departures	Loaded Vehicle Departures	Empty Vehicle Departures	% of vehicles leaving empty	Total Vehicle Departures	Average Vehicle Waiting Time	Average Vehicle Waiting Time (for a fare)	Maximum Vehicle Waiting Time (for a fare)	Average Passenger Waiting Time in Hour	Average Passenger Waiting Time, those waiting only	Number of people waiting 1-5 mins	Number of people waiting 6-10 mins	Number waiting 11 mins or more	Maximum passenger wait time
Westgate Sat	11/10/2014	6	1	0	0	0	0%	0	00:12:00	00:00:00	00:00:00						
Westgate Sat	11/10/2014	7	0	0	0	1	100%	1	00:00:00	00:00:00	00:00:00						
Westgate Sat	11/10/2014	8	0	0	0	0	0%	0	00:00:00	00:00:00	00:00:00						
Westgate Sat	11/10/2014	9	1	0	0	1	100%	1	00:01:00	00:00:00	00:00:00						
Westgate Sat	11/10/2014	10	1	0	0	1	100%	1	00:01:00	00:00:00	00:00:00						
Westgate Sat	11/10/2014	13	1	0	0	1	100%	1	00:00:00	00:00:00	00:00:00						
Westgate Sat	11/10/2014	15	3	3	2	1	33%	3	00:06:20	00:09:30	00:12:00						
Westgate Sat	11/10/2014	16	1	0	0	1	100%	1	00:01:00	00:00:00	00:00:00						
Westgate Sat	11/10/2014	17	5	3	3	1	25%	4	00:06:00	00:07:15	00:14:00						
Westgate Sat	11/10/2014	18	2	2	1	2	67%	3	00:00:30	00:00:00	00:00:00						
Westgate Sat	11/10/2014	19	8	14	6	1	14%	7	00:03:52	00:04:00	00:15:00	00:00:04	00:01:00	1	0	0	00:01:00
Westgate Sat	11/10/2014	20	11	12	6	1	14%	7	00:12:16	00:12:30	00:19:00						
Westgate Sat	11/10/2014	21	12	22	14	0	0%	14	00:06:15	00:06:15	00:14:00						
Westgate Sat	11/10/2014	22	23	43	26	0	0%	26	00:02:02	00:02:02	00:09:00	00:01:27	00:04:00	16	3	0	00:07:00
Westgate Sat	11/10/2014	23	27	42	26	1	4%	27	00:01:08	00:01:11	00:06:00	00:01:50	00:06:00	3	8	0	00:10:00
Westgate Sat	12/10/2014	0	16	28	16	0	0%	16	00:00:52	00:00:52	00:06:00	00:01:26	00:03:36	8	2	0	00:09:00
Westgate Sat	12/10/2014	1	5	10	5	0	0%	5	00:01:24	00:01:24	00:07:00	00:01:50	00:03:40	4	2	0	00:07:00
Westgate Sat	12/10/2014	2	2	5	2	0	0%	2	00:00:00	00:00:00	00:00:00						
Westgate Sat	12/10/2014	3	1	2	1	0	0%	1	00:01:00	00:01:00	00:01:00	00:03:00	00:03:00	2	0	0	00:03:00
Westgate Sat	**11/10/2014**		**120**	**186**	**108**	**12**	**10%**	**120**				**00:01:07**	**00:04:13**	**34**	**15**	**0**	**00:10:00**

Survey	Date	Hour	No of Vehicle Arrivals	Total Passenger Departures	Loaded Vehicle Departures	Empty Vehicle Departures	% of vehicles leaving empty	Total Vehicle Departures	Average Vehicle Waiting Time	Average Vehicle Waiting Time (for a fare)	Maximum Vehicle Waiting Time (for a fare)	Average Passenger Waiting Time in Hour	Average Passenger Waiting Time, those waiting only	Number of people waiting 1-5 mins	Number of people waiting 6-10 mins	Number waiting 11 mins or more	Maximum passenger wait time
George St Sat	11/10/2014	22	20	19	7	12	63%	19	00:02:06	00:01:42	00:04:00						
George St Sat	11/10/2014	23	12	8	5	7	58%	12	00:01:55	00:02:20	00:07:00						
George St Sat	12/10/2014	0	9	20	7	2	22%	9	00:01:06	00:01:10	00:04:00	00:00:18	00:02:00	3	0	0	00:02:00
George St Sat	12/10/2014	1	10	27	10	1	9%	11	00:01:06	00:01:06	00:06:00	00:00:26	00:06:00	0	2	0	00:06:00
George St Sat	**11/10/2014**		**51**	**74**	**29**	**22**	**43%**	**51**				**00:00:15**	**00:03:36**	**3**	**2**	**0**	**00:06:00**

Survey	Date	Hour	No of Vehicle Arrivals	Total Passenger Departures	Loaded Vehicle Departures	Empty Vehicle Departures	% of vehicles leaving empty	Total Vehicle Departures	Average Vehicle Waiting Time	Average Vehicle Waiting Time (for a fare)	Maximum Vehicle Waiting Time (for a fare)	Average Passenger Waiting Time in Hour	Average Passenger Waiting Time, those waiting only	Number of people waiting 1-5 mins	Number of people waiting 6-10 mins	Number waiting 11 mins or more	Maximum passenger wait time
Southgate St Fri	10/10/2014	22	4	3	3	1	25%	4	00:01:45	00:02:20	00:06:00	00:00:20	00:01:00	1	0	0	00:01:00
Southgate St Fri	10/10/2014	23	2	1	1	1	50%	2	00:01:30	00:02:00	00:02:00						
Southgate St Fri	11/10/2014	0	9	11	5	4	44%	9	00:01:40	00:01:12	00:03:00	00:02:10	00:12:00	0	0	2	00:12:00
Southgate St Fri	11/10/2014	1	9	17	7	2	22%	9	00:01:26	00:01:17	00:05:00	00:00:24	00:01:45	4	0	0	00:02:00
Southgate St Fri	11/10/2014	2	11	21	8	3	27%	11	00:03:49	00:04:30	00:10:00	00:00:05	00:01:00	2	0	0	00:01:00
Southgate St Fri	**10/10/2014**		**35**	**53**	**24**	**11**	**31%**	**35**				**00:00:38**	**00:03:47**	**7**	**0**	**2**	**00:12:00**

Survey	Date	Hour	No of Vehicle Arrivals	Total Passenger Departures	Loaded Vehicle Departures	Empty Vehicle Departures	% of vehicles leaving empty	Total Vehicle Departures	Average Vehicle Waiting Time	Average Vehicle Waiting Time (for a fare)	Maximum Vehicle Waiting Time (for a fare)	Average Passenger Waiting Time in Hour	Average Passenger Waiting Time, those waiting only	Number of people waiting 1-5 mins	Number of people waiting 6-10 mins	Number waiting 11 mins or more	Maximum passenger wait time
Southgate St Sat	11/10/2014	23	2	4	1	1	50%	2	00:00:00	00:00:00	00:00:00						
Southgate St Sat	12/10/2014	0	5	4	3	2	40%	5	00:01:36	00:00:20	00:01:00	00:00:30	00:01:00	2	0	0	00:01:00
Southgate St Sat	12/10/2014	1	8	14	5	3	38%	8	00:02:45	00:01:36	00:04:00						
Southgate St Sat	12/10/2014	2	5	12	5	0	0%	5	00:01:36	00:01:36	00:04:00						
Southgate St Sat	**11/10/2014**		**20**	**34**	**14**	**6**	**30%**	**20**				**00:00:04**	**00:01:00**	**2**	**0**	**0**	**00:01:00**

Survey	Date	Hour	No of Vehicle Arrivals	Total Passenger Departures	Loaded Vehicle Departures	Empty Vehicle Departures	% of vehicles leaving empty	Total Vehicle Departures	Average Vehicle Waiting Time	Average Vehicle Waiting Time (for a fare)	Maximum Vehicle Waiting Time (for a fare)	Average Passenger Waiting Time in Hour	Average Passenger Waiting Time, those waiting only	Number of people waiting 1-5 mins	Number of people waiting 6-10 mins	Number waiting 11 mins or more	Maximum passenger wait time
Queen Sq Fri	10/10/2014	9	1	1	1	0	0%	1	00:01:00	00:01:00	00:01:00						
Queen Sq Fri	10/10/2014	10	0	0	0	0	0%	0	00:00:00	00:00:00	00:00:00						
Queen Sq Fri	10/10/2014	11	0	0	0	0	0%	0	00:00:00	00:00:00	00:00:00						
Queen Sq Fri	10/10/2014	12	0	0	0	0	0%	0	00:00:00	00:00:00	00:00:00						
Queen Sq Fri	10/10/2014	13	0	0	0	0	0%	0	00:00:00	00:00:00	00:00:00						
Queen Sq Fri	10/10/2014	14	0	0	0	0	0%	0	00:00:00	00:00:00	00:00:00						
Queen Sq Fri	10/10/2014	15	1	0	0	1	100%	1	00:04:00	00:00:00	00:00:00						
Queen Sq Fri	10/10/2014	16	1	0	0	1	100%	1	00:10:00	00:00:00	00:00:00						
Queen Sq Fri	10/10/2014	17	0	0	0	0	0%	0	00:00:00	00:00:00	00:00:00						
Queen Sq Fri	10/10/2014	18	1	1	1	0	0%	1	00:00:00	00:00:00	00:00:00						
Queen Sq Fri	10/10/2014	19	1	0	0	1	100%	1	00:01:00	00:00:00	00:00:00						
Queen Sq Fri	**10/10/2014**		**5**	**2**	**2**	**3**	**60%**	**5**									
												00:03:39					
												00:03:39					

Survey	Date	Hour	No of Vehicle Arrivals	Total Passenger Departures	Loaded Vehicle Departures	Empty Vehicle Departures	% of vehicles leaving empty	Total Vehicle Departures	Average Vehicle Waiting Time	Average Vehicle Waiting Time (for a fare)	Maximum Vehicle Waiting Time (for a fare)	Average Passenger Waiting Time in Hour	Average Passenger Waiting Time, those waiting only	Number of people waiting 1-5 mins	Number of people waiting 6-10 mins	Number waiting 11 mins or more	Maximum passenger wait time
Bath Spa Fri	10/10/2014	7	4	0	0	0	0%	0	00:04:45	00:04:45	00:06:00						
Bath Spa Fri	10/10/2014	8	20	20	17	0	0%	17	00:14:33	00:14:33	00:22:00						
Bath Spa Fri	10/10/2014	9	26	26	25	0	0%	25	00:20:13	00:20:13	00:33:00						
Bath Spa Fri	10/10/2014	10	26	34	26	0	0%	26	00:14:09	00:14:09	00:25:00						
Bath Spa Fri	10/10/2014	11	32	43	29	0	0%	29	00:15:37	00:15:37	00:25:00						
Bath Spa Fri	10/10/2014	12	33	56	36	0	0%	36	00:10:52	00:10:52	00:25:00						
Bath Spa Fri	10/10/2014	13	36	56	35	0	0%	35	00:10:05	00:10:05	00:24:00	00:00:02	00:02:00	1	0	0	00:02:00
Bath Spa Fri	10/10/2014	14	40	60	40	0	0%	40	00:08:54	00:08:54	00:18:00						
Bath Spa Fri	10/10/2014	15	44	60	42	0	0%	42	00:03:39	00:03:39	00:14:00	00:01:48	00:04:00	26	1	0	00:06:00
Bath Spa Fri	10/10/2014	16	37	56	41	0	0%	41	00:03:38	00:03:38	00:12:00	00:01:21	00:04:00	15	4	0	00:07:00
Bath Spa Fri	10/10/2014	17	42	60	44	0	0%	44	00:07:00	00:07:00	00:13:00	00:00:02	00:01:00	2	0	0	00:01:00
Bath Spa Fri	10/10/2014	18	65	88	60	0	0%	60	00:04:16	00:04:16	00:14:00	00:01:25	00:03:40	30	4	0	00:07:00
Bath Spa Fri	10/10/2014	19	65	101	64	0	0%	64	00:06:26	00:06:26	00:14:00						
Bath Spa Fri	10/10/2014	20	67	96	67	0	0%	67	00:05:23	00:05:23	00:13:00	00:01:02	00:02:46	33	3	0	00:06:00
Bath Spa Fri	10/10/2014	21	101	163	105	0	0%	105	00:01:37	00:01:37	00:09:00	00:01:33	00:02:34	99	0	0	00:05:00
Bath Spa Fri	10/10/2014	22	62	94	59	1	2%	60	00:07:28	00:07:34	00:19:00						
Bath Spa Fri	10/10/2014	23	51	86	59	0	0%	59	00:05:24	00:05:24	00:14:00	00:00:18	00:02:20	12	0	0	00:04:00
Bath Spa Fri	11/10/2014	0	42	68	40	2	5%	42	00:01:30	00:01:30	00:06:00	00:00:40	00:01:54	22	0	0	00:04:00
Bath Spa Fri	11/10/2014	1	36	56	35	1	3%	36	00:04:20	00:04:24	00:12:00	00:00:52	00:03:03	16	0	0	00:05:00
Bath Spa Fri	11/10/2014	2	3	5	3	1	25%	4	00:03:00	00:01:30	00:02:00						
Bath Spa Fri	**10/10/2014**		**832**	**1228**	**827**	**5**	**1%**	**832**				**00:00:38**	**00:02:56**	**256**	**12**	**0**	**00:07:00**

Appendix 2 Stakeholder Feedback Diary

Chapter	Stakeholder Group / Person	Date	Views returned?
5	**Supermarkets**		
	Sainsbury's Green Park	3/12/14	Y
	Waitrose, Podium	3/12/14	Y
	Morrison's London Road	3/12/14	Y
5	**Hotels**		
	Abbey Hotel	3/12/14	Y
	Halcyon Hotel and Circo Bar	3/12/14	Y
	Harrington Hotel	3/12/14	Y
	Hilton National Hotel	3/12/14	Y
	Queensbury Hotel	3/12/14	Y
	Royal Hotel	3/12/14	Y
	Restaurants		
	Café rouge, Milsom Street	3/12/14	N
	Carluccio's, Milsom Place	3/12/14	Y
	Frankie and Benny's, Kingsmead Leisure Complex	3/12/14	N
	Garfunkel's Orange Grove	3/12/14	N
	Jimmy's World Grill and Bar	3/12/14	Y
	Wagamama	3/12/14	Y
	Wetherspoon King of Wessex	3/12/14	Y
5	**Night clubs**		
	Taxi Marshals	Various	Y
	Club XL	3/12/14	N
	Moles (not currently open)	3/12/14	N
	Po Na Na	3/12/14	N
	Second Bridge Nightclub	3/12/14	Y
	Universities		
	Bath Spa University Students Union	13/5/14	N
	University of Bath Students Union	27/5/14	Y
5	**Hospital**		
	Bath Royal United	3/12/14	Y

5	**Disability, equality and other local group representatives**		
	B&NES Corporate Black and minority ethnic workers group	13/5/14	N – email unknown
	B&NES Corporate lesbian, gay, bisexual, transgender workers group	13/5/14	N
	BNES Corporate disabled workers group	13/5/14	N
	Black families education support group	13/5/14	N
	Bath Ethnic Minority Senior Citizens Association	13/5/14	N
	Bath Tourism Plus	13/5/14	N
	Bath Business Improvement District	26/5/14	Y
	Bath Chamber of Commerce	13/5/14	N
	Federation of Small Businesses	5/12/14	Y
	Federation of Bath Residents Associations and The Bath Abbey Residents Association	13/5/14	N
	GWE Business West - Bath	13/5/14	N
	Pubwatch	13/5/14	N
	Age Uk Bath	20/5/14	Y
	Bathwick Estates Residents Association	13/5/14	N
	Bathwick Hill Association	13/5/14	N
	Bear Flat Association	13/5/14	N
	Beech Avenue Association	13/5/14	N
	Camden Association	13/5/14	N
	Catharine Place Association	13/5/14	N
	Cavendish Crescent Association	16/5/14	Y
	Circus Area Residents Association	13/5/14	N
	Forum Residents Association	13/5/14	N
	Green Park Residents Association	13/5/14	N
	Greenway Lane Area Residents Association	13/5/14	N
	Henrietta Park Association	13/5/14	Y
	Hensley and Egerton Road Association	13/5/14	N
	Lansdown Crescent Association	13/5/14	N
	Macaulay Buildings / Prospect Road Association	13/5/14	N
	Marlborough Lane and Marlborough Buildings Association	13/5/14	N
	Pulteney Estate Residents Association	13/5/14	N
	Richmond Road Association	13/5/14	N
	The Royal Crescent Society	13/5/14	N
	Sion Hill Place Association	13/5/14	N
	St James Square Bath Ltd	13/5/14	N
	St James Park Residents Association	13/5/14	N

5	**Rail Operator**		
	Bath Spa Railway Station (FGW)	20/5/14	Y
5	**Police**		
	Avon and Somerset Police – Clive Summerill	18/7/14	Y
	British Transport Police	13/5/14	N
	Council representatives		
	Simon De Beer, Planning Policy and Environment Manager	15/5/14	Y
	Adrian Clarke, Transportation Planning Manager	14/5/14	Y
	Andy Strong, Public Transport Manager	20/5/14	Y
	Karen Giles, School Contracts	26/6/14	Y
	Community Safety	13/5/14	N
6	**Hackney carriage and private hire trade**		
	Via survey to all drivers		Y