



Bath and North East Somerset Council
Taxi unmet demand survey

August 2020

Executive Summary

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

The area has continued to see reducing levels of demand at the local ranks. This is in spite of people being happy with the service they receive and from a high level of awareness that hackney carriages are available and are recognisable. The continued impact of national and local apps that mean people to not have to go to ranks to obtain vehicles continues to erode more standard obtaining of vehicles at ranks.

However, apps have been a minor benefit to the hackney carriage trade as some people appear to have taken advantage of vehicles at lesser ranks. This suggests business-savvy hackney carriages might benefit from being more generally available across the full central area more.

The lack of significant unmet demand means the possibility exists of retaining the current vehicle limit policy, and there is no need for extra vehicles at this time. There would be value in better marketing of the location of all ranks and in reminding passengers they can use all ranks and can hail vehicles.

Retention of the limit implies need for fresh review, with rank surveys no later than three years from the date of this snapshot. The low ISUD index suggests having these at any time up to October 2023 should be secure.

Further research into the impact of the Covid-19 pandemic on both vehicle supply and demand in the area may be prudent to ensure that emerging trends can be identified early and remediated for by appropriate policy changes where necessary.



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1 General introduction and background

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

The Best Practice Guidance

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

Background

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

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

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

The most recent reviews were by the Office of Fair Trading in 2003, through the production of the BPG in 2010, the Law Commission review which published its results in 2014, the Parliamentary Task and Finish Group which reported in September 2018, the Government Response in February 2019 and the consultation on "Protecting Users" which closed on 22 April 2019 that then resulted in issue of the "Statutory Taxi and Private Hire Vehicle Standards" (STPHVS) on 23rd July 2020. None of these resulted in any material change to the legislation involved in licensing. Other groups have provided their comments (including the Urban Transport Group and the Competition and Markets Authority) but the upshot remains no change in legislation from that already stated above.

With respect to the principal subject of this survey, local authorities retain the right to restrict the number of hackney carriage vehicle licenses. The Law Commission conclusion included retention of the power to limit hackney carriage vehicle numbers but utilizing a public interest test determined by the Secretary of State. It also suggested the three- year horizon also be used for rank reviews and accessibility reviews. It is assumed the Government response to the Task and Finish Group is now effectively the current reaction to this extensive research.

Current Government Policy review status

It is also understood that the revisions resulting from the recently closed Government Consultation will eventually lead to a more comprehensive review of the sections of the BPG not affected by the February 2019 Statutory Guide, as stated in para 1.8 of that document – "A consultation on revised BPG, which focusses on recommendations to licensing authorities to assist them in setting appropriate standards (other than those relating to passenger safety) to enable the provision of services the public demand, will be taken forward once the final Statutory Guidance has been issued."

The "Statutory Taxi and Private Hire Vehicle Standards" (STPHVS) document suggests the taking forward of the wider BPG review will involve a consultation 'later this year (2020)' with the aim of making "clear recommendations on the measures licensing authorities should consider to enable the trade to react to the demands of passengers".

The April 2010 BPG therefore remains valid for our review.

The present background to policy

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

licences are available, which often are given 'grandfather' rights to remain as saloon style.

Within this quality restriction, there are various levels of strength of the types of vehicles allowed. The tightest restriction, now only retained by a few authorities only allows 'London' style wheel chair accessible vehicles, restricted to those with a 25-foot turning circle, and at the present time principally the LTI Tx, the Mercedes Vito special edition with steerable rear axle, and the Metrocab (no longer produced).

Others allow a wider range of van style conversions in their wheel chair accessible fleet, whilst some go as far as also allowing rear-loading conversions. Given the additional price of these vehicles, this often implies a restriction on entry to the hackney carriage trade.

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

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

Industry Standard evaluation of significance of unmet demand

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

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

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

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

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

Case law and unmet demand

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

R v Castle Point considered the issue of latent, or preferably termed, suppressed demand consideration. This clarified that this element relates only to the element which is measurable. Measurable suppressed demand includes inappropriately met demand (taken by private hire vehicles in situations legally hackney carriage opportunities) or those forced to use less satisfactory methods to get home (principally walking, i.e. those observed to walk away from rank locations). After this case, the latent demand questions were added to on street interviews to feed the latent demand factor inserted into the ISUD industry standard calculations.

Recent Challenges

2019 saw three challenges with respect to surveys of unmet demand. All three found in favour of the current methodology being undertaken. A key focus was the need for a robust and up to date independent survey report being available. In one case it was made clear the current guidance is based on the 2010 BPG, whilst in another case having a valid survey meant those challenging had no

case for their proposed challenge, and in the final case an authority was clearly told they could not rely on a very old survey which itself could not be produced.

Most recent changes relating to demand

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

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

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

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

The current status regarding unmet demand studies

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

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

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

Report. The Government has broadly supported the recommendations of this Task and Finish Group.

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

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

Conclusions

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

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

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

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

other companies in other areas if they are unable to fulfil their booking, but the interpretation of this has become quite wide.

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

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

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

Coronavirus

The serious Covid-19 virus took hold in the UK during March 2020. Whilst life carried on almost as normal until mid-March, formal lockdown was applied from Tuesday 24th March 2020 until further notice. Significant reductions in movement had begun to bite from the previous week. The last dates in 2020 when on-street and rank surveys were seen to be typical was Sunday 16th March, 2020.

For this survey, the rank work had been completed in early February, the on-street at a similar time whilst the driver survey was undertaken once the rank work was completed. Whilst some returns were made after the lockdown, request was made (and was complied with) for information regarding operations during February or early March. Key stakeholders had not been contacted and very few of these responded when it was felt contact was reasonable. Four other studies were completed to generally similar levels of input.

All the evidence gathered above will remain valid as a snapshot of the operation of the industry immediately before the lock down and these reports have been produced on that basis, keeping in mind the developing situation as part of our considerations within analysis.



2 Local background and context

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

- appointed Licensed Vehicle Surveys and Assessment (LVSA) on 4 December 2019
- in accordance with our proposal of November 2019
- as confirmed during the inception meeting for the survey held on 23 January 2020
- this survey was carried out principally in February / early March 2020
- On street pedestrian survey work occurred in very early March 2020 (on a Wednesday and a Thursday)
- the video rank observations occurred early February 2020
- Licensed vehicle driver opinions and operating practices were canvassed using an electronically available and posted out survey during March and April 2020 (but with a clear request to complete for the February period)
- Key stakeholders were consulted during July once it was felt reasonable to try to contact them as some element of normality returned, although few responded.
- A draft of this Final Report was reviewed by the client during July 2020
- and reported to the appropriate Council committee following acceptance by the client.

Our previous report for B&NES was reported to the appropriate Council committee in January 2018. It was agreed at inception that the bulk of information for this study should be collected soon after appointment rather than waiting till the October for the rank work. This was a fortuitous decision given following events.

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

Policy Background

In terms of background council policy B&NES being a unitary authority has all highway, transport and planning policies under its direct control. At the present time, a new draft Joint Local Transport Plan (JLTP4) has been prepared by the West of England Combined Authority (WECA) and the four constituent authorities including B&NES. It sets out the vision for transport investment covering 2020 to 2036. It was published in January 2019 with a final document now dated March 2020. WECA was established during 2017, after the previous study had concluded. The information below is quoted from the latest documentation available as at early May 2020 but is mainly repeating the documents available (and not necessarily the views of the authors of this report).

JLTP4 has a banner title of “Connecting people and places for a vibrant, inclusive and carbon neutral West of England”. Within the full area, bus patronage has grown against a national trend of decline, and cycling trips have doubled. Rail passengers have doubled since 2008. It notes that the transport sector in the South West contributes 32% of carbon emissions. With no action, this level is expected to increase a further 22% by the 2036 plan end.

All four authorities, including B&NES have declared climate emergencies. A key aim arising is transport being carbon neutral by 2030.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

The document also references the Bath BREATHE Clean Air Zone project. This has moved forward with significant thought given from within the Licensing team about how to deliver this whilst ensuring public demand remains best met.

Population background

The authority has a current population of 192,437 using the 2020 estimates currently available from the 2011 census, 2016 revision. Whilst there had been a 0.7% increase in population from 180,124 in the 2014 survey to 181,500 in the 2017, this latest figure is 6% more, suggesting a good level of growth in potential demand for licensed vehicles.

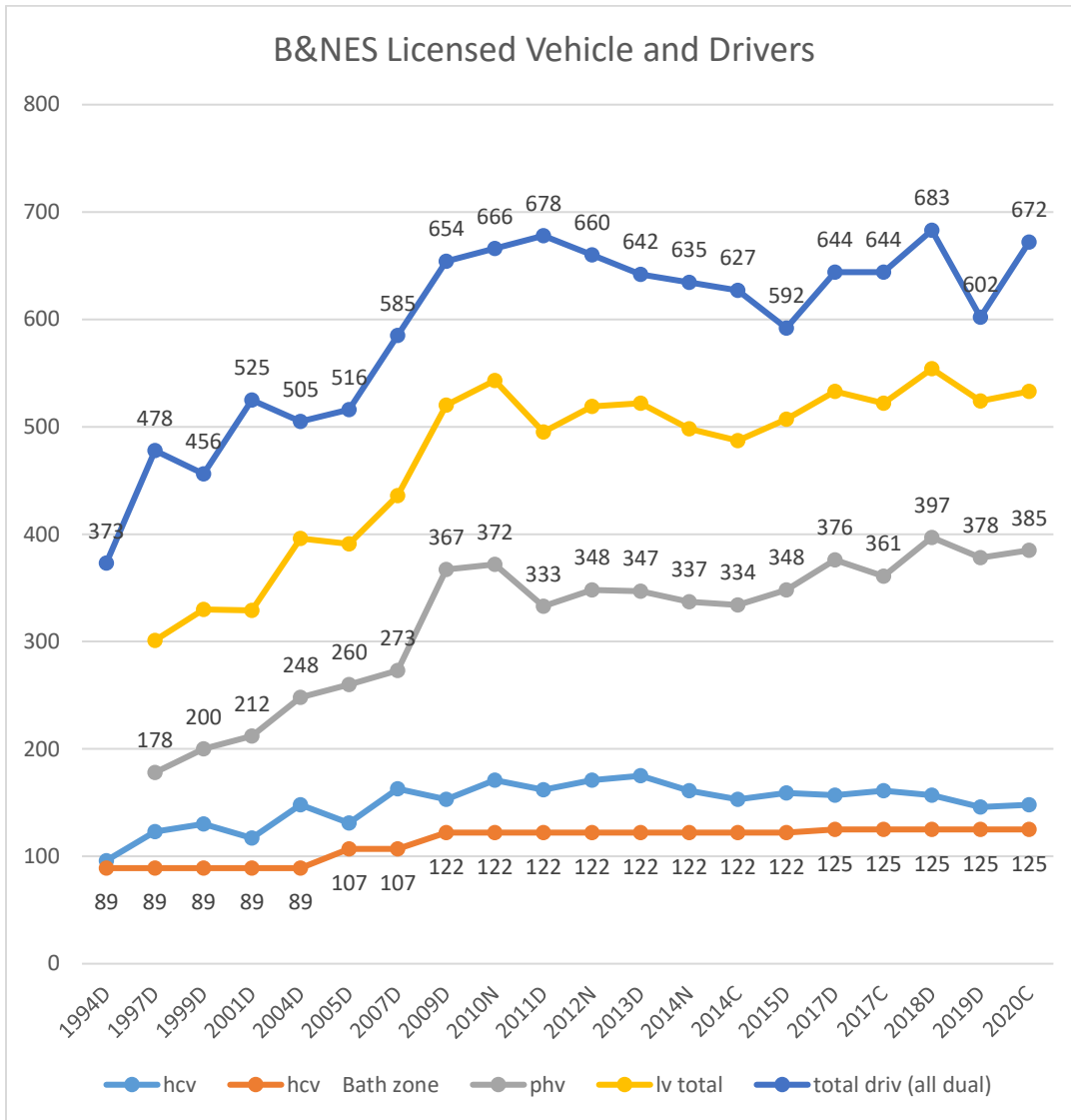
Limit Policy Historical Background

B&NES Council has chosen to utilize its power to limit hackney carriage vehicle numbers, and as far as we are aware has done so since at least 1994. Prior to this survey, previous tests of the validity of the limit and the level of the number of vehicle licences were undertaken in 2017, 2014, 2011, 2008 and on several occasions prior to that.

B&NES is also one of the few remaining authorities operating a zoning system. The Bath City zone, equating to the former City Boundary, retains a limit on hackney carriage vehicle numbers, whilst the outer zone, the remainder of the more rural area agglomerated into the new authority, has no limit on hackney carriage vehicle numbers.

Statistical Background

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



Key: hcv – hackney carriage vehicles
 Phv – private hire vehicles
 Lv – total licensed vehicles, hackney carriage and private hire
 Driv - drivers

Licensing Statistics from 1994 to date

The graph shows the three issues of plates in the Bath limited vehicle number zone. The actual number of motorised vehicle plates active in the Bath zone at the time of the survey (with the horse-drawn vehicle not appearing to be trading and one motorised vehicle not available for service at the time due to mechanical issues) was in fact 123. The overall trend in the outer zone hackney carriages is a gentle decline in numbers, compared to the steady state of these at the time of the last survey (shown above by the 2015 and 2017 observations)

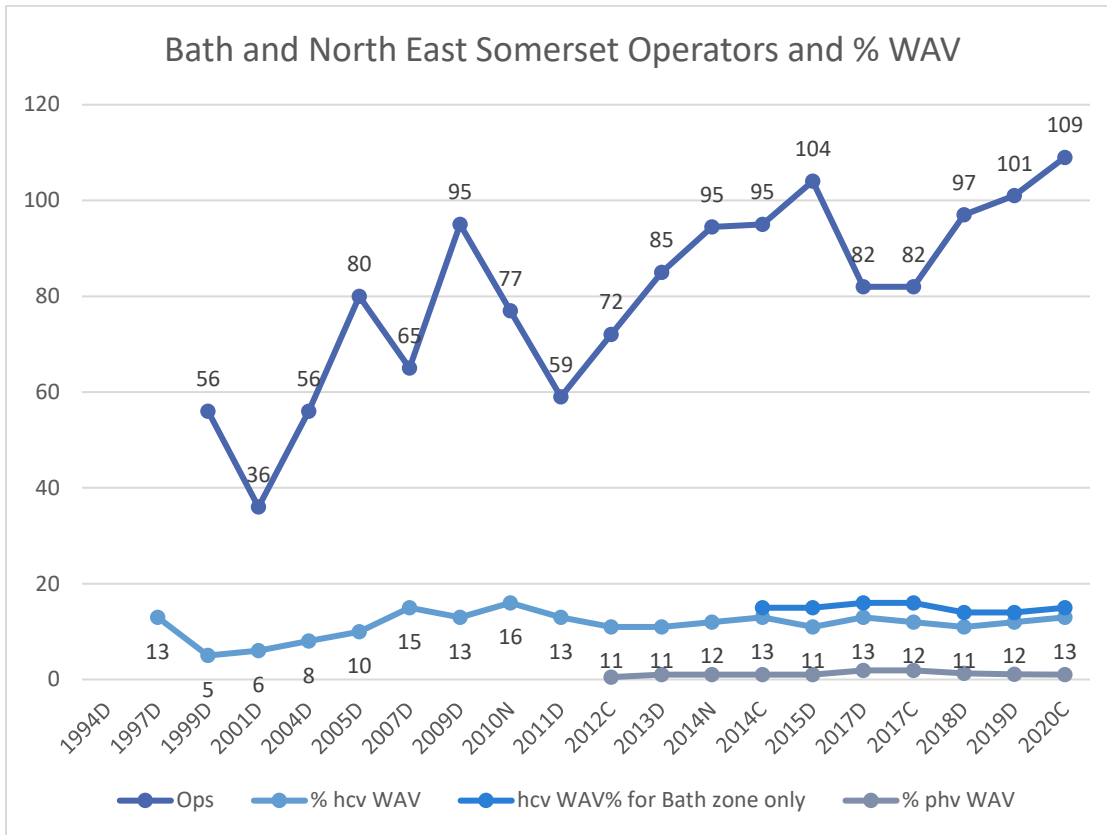
Private hire vehicles continue to see a gentle increase, with their level now 116% higher than when statistics were first collected, compared to the maximum 40% growth of hackney carriage vehicle numbers in that time (or 54% if the full hackney carriage fleet is considered).

The authority has long had dual driver licences, allowing people to choose the best kind of vehicle to use, and allowing transfer between vehicle types without hindrance. After a period of decline in driver numbers to a low around the time of the last survey, the period since has seen overall driver numbers grow, by about 14% since the low, although there was also a high at the time of the March 2019 DfT statistic gathering.

We understand that following the pandemic, as at August 2020, all zone 1 hackney carriage vehicles have renewed their licences albeit with some taking payment holidays on the fee. The private hire industry suffered more, and has steadily returned, but numbers of actual vehicles (that cannot be limited in any event) will not truly be known until after the renewal process is completed over the next few months.

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





Key: Ops – Operators; % hcv WAV – percentage of hackney carriage vehicles which are Wheel Chair Accessible style

Operator numbers and levels of WAV provision in the fleet

This graph shows an overall and general increase in the level of private hire operators in the area. Some decline was observed around the time of the last survey, albeit more sharp and lagged to that in vehicle numbers, but since that time the growth in overall operator numbers has continued.

This suggests continuing levels of competition in the industry and a very clear increase in the number of operators available giving drivers more choice in who they might work for.

The picture for WAV style vehicles remains similar – with the current zone 1 level being 13%, with just one hackney carriage WAV for zone 2, and a very small proportion in the private hire fleet.

Compared to the national situation for WAV style vehicles from the March 2019 DfT statistics, Bath has around 4% of its total licensed fleet of WAV style and in this respect is 222nd equal out of the 292 authorities compared with 11 other licensing areas including Torridge and Wakefield that both retain limits, plus nearby Stroud. The national average is that 14% of licensed vehicles in English licensing authorities (both hackney carriage and private hire) are WAV style.

These figures exclude London but do include some 100% WAV hackney carriage fleets.

Split by hackney carriage and private hire, the 2019 national average, again excluding London, was 42% WAV in the hackney carriage and 3% WAV in the private hire fleets. There were 122 licensing authorities with lower proportions of WAV in their hackney carriage fleet than B&NES – 41% of all licensing authorities. Of the other authorities with higher levels, 60 have fully WAV fleets. This implies there are 110 authorities that do not have fully WAV fleets that have more WAV proportionately in their hackney carriage fleet than B&NES, suggesting B&NES is more average than the figures suggest.

App usage

In recent years more people have been using 'apps' (and other increasingly 'modern') methods of obtaining licensed vehicles. These have both national (two international operators) and local examples, with both national apps active in Bath (although one began two years prior to the other). There is at least one locally-based app, operated by the major company which operates under two different names (one with a hackney carriage focus and the other private hire). Whilst these are not direct hackney carriage demand, usually undertaken on private hire operating platforms, many can confuse this option with 'hailing' a vehicle which is a hackney carriage only option.

The main local company with an app told us the proportion of their bookings that have been using their app has been increasing. In October 2018, 12.6% of all their bookings were on their app. This rose to 17.9% in February 2019, 23.6% in October 2019 and 27.9% for February 2020. Comparing October 2019 with February 2019, total bookings were 16% down in February whilst for the same comparison ending in February 2020, the difference was 11%. Interestingly comparing year on year, the February values were about 1% higher in 2020 whilst the October were 5% lower for the latest value.

3 Patent demand measurement (rank surveys)

As already recorded in Chapter 2, control of provision of on-street ranks in B&NES is directly under the control of the authority, albeit another part and not directly licensing. Appendix 2 provides a list of ranks in B&NES at the time of this current survey. No changes have occurred since the 2017 survey.

Our methodology involves a current review both in advance of submitting our proposal to undertake this taxi unmet demand survey and at the study inception meeting, together with site visits where considered necessary. This provides a valid and appropriate sample of rank coverage which is important to feed the numeric evaluation of the level of unmet demand, and its significance (see discussion in Chapter 7). The detailed specification of the hours included in the sample is provided in Appendix 3. Detailed results by rank, day and hour are in Appendix 4.

Compared to the previous 2017 survey, opportunity was taken to add quick-watch viewing of the Henry Street rank to understand how this is utilised, with a further day added to the observations at the private station rank location. This latter observation would also give a better idea of the level of WAV vehicles and their usage at the station, understood to be a key location both for such usage, and also for a place people sometimes claim they are unable to obtain a WAV when needed.

Overview of rank observations

The rank observations were analysed to understand the level of vehicle and passenger activity at or around the ranks (in any manner felt to affect the operation of the rank itself). During the course of the survey, 9,935 different occurrences were noted, ranging from vehicle arrivals and departures to passenger arrivals, walk-aways, vehicle and passenger departures, activity of other vehicles at or near the ranks, and general notes about operation. A total of 286 hours of observations were covered.

In terms of the overall activity as recorded above, 38% were at the private Bath Spa station rank, 36% at the Abbey Rank, 10% at Westgate Buildings, 8% at Southgate Street, 7% at George Street and just 1% at the Henry Street rank near Marks and Spencer. There were 3,460 vehicle arrivals and departures, 4,508 passenger arrivals, 61 apparent walk-aways and 4,447 people leaving the locations in vehicles. Over half of the apparent walk-aways were from the private Bath Spa station rank. There were just two walk-aways from the Abbey rank.

Considering the records of vehicle arrivals and departures, similar proportions were found to the above, with 37% of all vehicles seen at the Abbey rank, 36% at the private Bath Spa Station rank, 10% at Westgate Buildings, 8% each at Southgate Street and George Street and again just 1% at Henry Street.

With respect to private cars, the overall level was 8% of all vehicles, with hackney carriages being 86%. Goods vehicles were 1%, private hire 4% and just a handful of emergency vehicles. In terms of the worst rank location for cars, this was Southgate Street where 45% of observed vehicles were cars. George Street had 32% cars and Westgate Buildings 13%. All are ranks within the main street where the ranks are rarely full of hackney carriages. Both the station and Abbey only saw 1% of vehicles as private cars given the nature of these locations and the relatively high usage by hackney carriages at all times of day. It must be noted that the observations only cover the periods the ranks are actually active legally as ranks. Where ranks are part-time there is often over-spill of private parking into the early hours of rank usage, which appears to be the case at Southgate Street.

Overall rank usage estimates

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

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

The table above shows the estimated weekly number of passengers for all active ranks in the B&NES central zone is 10,737. This is 27% less than that observed in 2017, although the 2020 observations are in February rather than in October, so they would be expected to be lower. However, the levels remain higher than those observed in 2008.

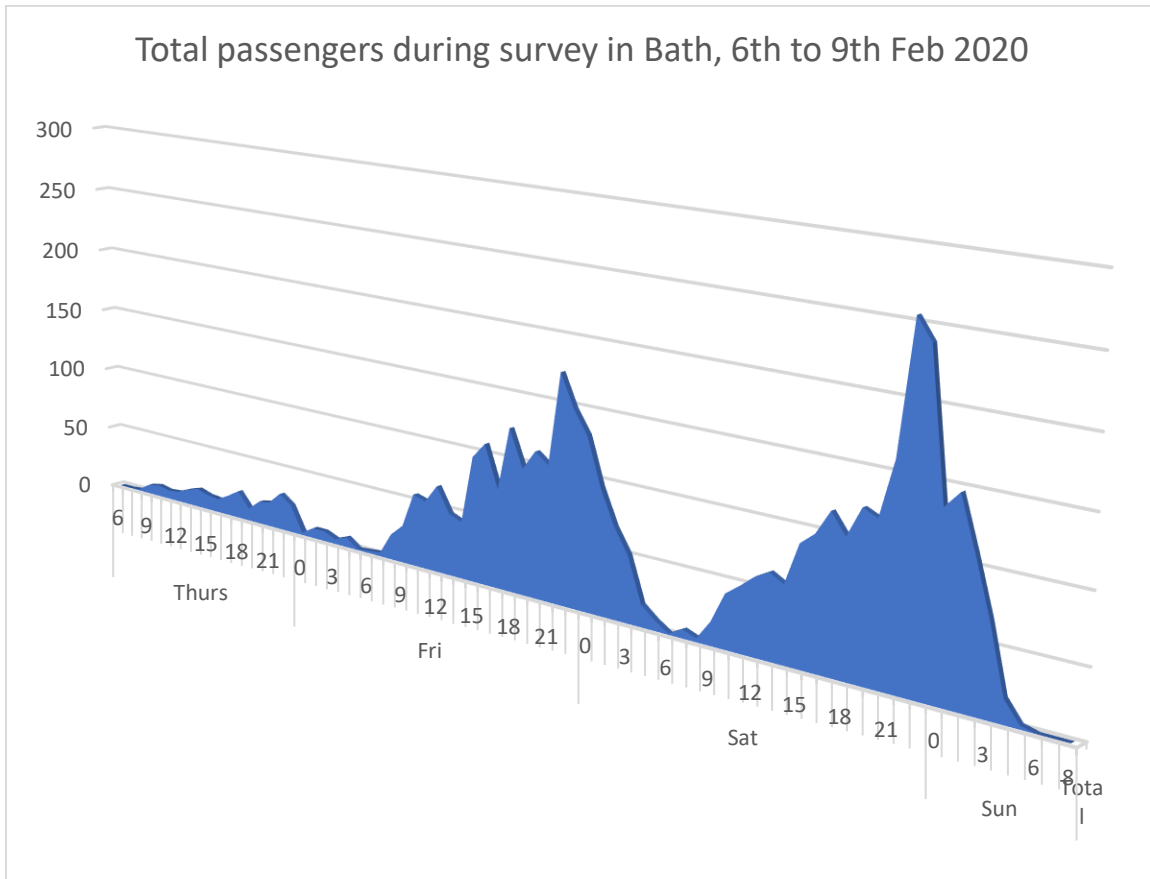
For this set of observations, the order of levels of usage remains essentially the same as in 2017. The private rank at Bath Spa station remains the most important rank, with increased share of the market in this survey. The Abbey rank remains second, but seems to have lost a lot of its share (which may be related to reduced tourist flows).

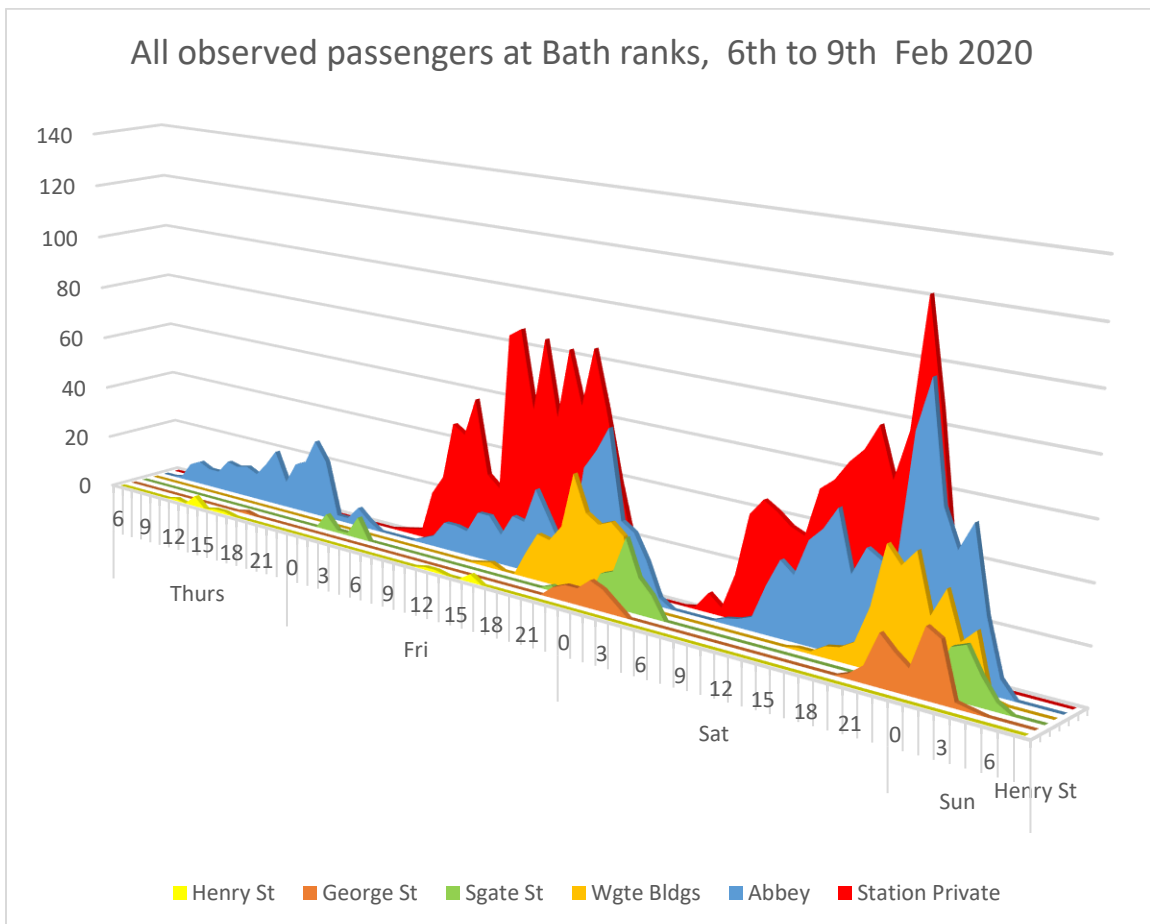
Interestingly, the Westgate rank this time saw 15% of the overall passengers during the survey period, over double the number from 2017 although still only moderate compared to the top two ranks. Southgate Street and George Street have also increased their level of usage and share, but again only contribute minor levels of usage and little stock should be taken of these changes although it is worthy of note.

Rank usage by location and time

The graph below shows total passenger flows using the data from each rank and day of the survey. It does not take account of the impacts of ranks not surveyed on particular days, principally therefore understating the share of flows on Thursday given the Bath Spa Station rank was not observed on that day.







Friday levels of demand at the Bath Spa Station rank tend to remain relatively stable from late afternoon, after an over-lunch dip. The Saturday station flows generally rise steadily, then rapidly to the overall peak.

The Abbey rank tends to be more peaked than the Bath Spa Station rank, and the overall passenger peak is contributed to by both locations almost equally, splitting the fleet between these two locations at the highest demand period. The Westgate Buildings, Southgate Street and George Street ranks all provide some additional patronage most of which is at night or in the early hours, although Westgate Buildings demand begins mid-afternoon.

Overall, Bath tends to be a two-rank operation till early afternoon, when Westgate Buildings starts to see more usage. As the night progresses, Southgate Street and George Street supplement the other three ranks, with the Bath Spa Station rank tending to cease operation once the main bulk of trains services cease.

Surveyed hours with observed unmet demand

Information collected was revised to identify hours by the level of average passenger delay. Of the 286 hours observed, 10% had some average passenger delay identified. However, just three hours (1% of the total) had delay averaging over a minute – a very low total.

The longest observed passenger wait was 14 minutes for one person. This hour, 23:00 at Westgate Buildings on the Saturday, also saw 12 others wait between one and five minutes, and resulted in the third highest average passenger delay in an hour, just under 1.5 minutes.

The top two average passenger hourly delays, of over 8 minutes and over 2 minutes, both occurred at the Southgate Street location. Both were at times when overall demand was low and therefore vehicles were not necessarily expecting demand. This is termed 'thin demand' and is not usually considered to be unmet demand that could be reacted to by need for further vehicles.

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

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

Persons walking away from ranks

The number of people observed to arrive at a rank and then leave without taking a hackney carriage (or any other vehicle) was very small at just 1% of the total passengers observed. As already noted, the bulk of these were at the Bath Spa station rank. There was just one such walk-away at the Abbey rank, which tends to see more vehicles, whilst there was an almost equal level at Southgate Street and Westgate Buildings. None were significant.

Frequency of vehicle operation during rank survey

A test was undertaken on the Saturday identifying the hackney carriage plates active at or near the two main ranks in central Bath, Abbey and the Station. During the ten hours observed, some 500 different movements were observed. These were reviewed to identify only local B&NES hackney carriages with a total of 429 such hackney carriage movements observed in total.

During the six periods observed in total, 73% of all the available zone 1 hackney carriage plates were observed active. However, the largest proportion in any period was 59% of the fleet seen in the 22:00 to midnight period at or near Abbey rank. Across the three periods at the Abbey rank, 68% of the available hackney carriage fleet was observed. For Bath Spa Station, the proportion of the fleet seen over the three periods there was 37%.

Looking at the periods separately, the peak activity level at the Station in terms of different plates seen was the 19:00 to 21:00 period, when 26% of available plates were seen. 14:00 to 16:00 saw 31% and 00:30 to 01:30 15%. At the Abbey rank values tended to be higher as already noted, with 16:30 to 18:30 seeing 31% and 02:00 to 03:00 24%. Although this suggests that many were out active during the time of the survey, it still shows available headroom within the fleet to meet more demand than was observed.

When the actual active hackney carriage plates are considered, about half the fleet was seen at or near the Abbey Rank only, 43% were seen at or near both Abbey and the Station whilst just 7% were seen only at the Station. This suggests there is an impact of the extra permit on plate activity but that even those with permits do not see the Station as a place to get all their fares from.

Comparing active plates and level of activity for all hackney carriages, the station tended to see vehicles more highly active (i.e. returning several times in the period) compared to the Abbey rank where return frequencies tended to be lower, apart from the peak sample of 22:00 to midnight when there was a much higher frequency of turnround than in other periods. The observed 59% of active plates servicing that period produced 66% of the total number of observations from all observations at or near the Abbey.

The figures also suggest that the hackney carriage fleet overall sees most vehicles and most activity in evenings, followed by the next highest levels in the afternoon, with late night / early hours demand seeing the lowest proportions of vehicles and also the lowest numbers of trips. This suggests a relatively low level of night activity in the B&NES economy at the time of these surveys. This could have been influenced by the survey being at the start of February, and possibly also by the impact of heavy rain that may have reduced further the wish to go out that night. However, high rain can often increase usage of licensed vehicles with people less willing to walk home.

Observed usage for those with disabilities

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

However, the actual level of usage by people in wheelchairs was very low, with just one passenger observed at the Abbey rank and one at the private Bath Spa Station rank during our survey. The level of people who appeared to be disabled but not needing wheelchairs was slightly higher. There were 19 such observations at the Bath Spa Station rank, five at the Abbey and one at Westgate Buildings.

Marshal data for rank usage

B&NES has a long-standing marshal arrangement covering the Abbey rank. In the last study data was compared between August 2012 and October 2017. Comparison between the two sets of observations found fairly good comparison between total passenger numbers. No new information was available for this study.

However, the data was used to compare the average difference between February flows and October flows. For the five years available (2013 to 2017) the average February passenger flow from marshal data was 1,525. For October this value was marginally higher at 1,575. This suggests on average little difference between flows in these two months although the data showed much larger variation week on week.

Comparison to national rail information

Statistics are published nationally for all of the 2,567 rail stations in Great Britain. They provide estimated entries and exit totals for the year ending March of the years quoted based on ticket sales and various other assumptions (not direct counts). However, they are accepted as valid levels of station usage and are generally consistent between stations in given years, although the data does vary over the years as methodology and understanding of the data sets increases.

Bath annual patronage position has gone down from 65th to 78th since last survey. This is despite flows having risen by 7%, although the bulk of that growth was in the first year after the last survey. Flows have been impacted by the engineering work providing the electrification of the route, and will be impacted by the introduction of the new trains (and of course now, the coronavirus, although given the statistical time series, the impact of this will probably only be seen in the information published in December 2022).

For the last available year, there were just over 6.5 million entries and exits from the station. This implies about 65,380 people leaving the station on average per week. Given there are 6,308 estimated passenger departures in a typical week from the station, this implies about 10% leave the station in a hackney carriage from the rank.

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



Rail year (ends March in last year noted)	Entries / exits	Growth / decline
Bath Spa (78th)		
1997 / 1998	2,681,441	n/a
1998 / 1999	2,760,990	3%
1999 / 2000	2,933,619	6%
2000 / 2001	3,009,640	3%
2001 / 2002	3,108,318	3%
2002 / 2003	3,332,671	7%
2003 / 2004	Not collected	
2004 / 2005	3,726,900	12%
2005 / 2006	3,905,144	5%
2006 / 2007	4,244,776	9%
2007 / 2008	4,478,305	6%
2008 / 2009	4,757,904	6%
2009 / 2010	4,779,480	0%
2010 / 2011	5,217,954	9%
2011 / 2012	5,681,252	9%
2012 / 2013	5,757,880	1%
2013 / 2014	5,990,274	4%
2014 / 2015	6,222,126	4%
2015 / 2016	6,134,318	-1%
2016 / 2017	6,432,334	5%
2017 / 2018	6,395,694	-1%
2018 / 2019	6,538,056	2%
Last three years (13/14 to 16/17)		+7%
Start of statistics to date		+144%

Rail year (ends March in last year noted)	Entries / exits	Growth / decline
Keynsham (900th)		
1997 / 1998	102,253	n/a
1998 / 1999	101,850	-0.4%
1999 / 2000	112,055	10%
2000 / 2001	118,047	5%
2001 / 2002	130,148	10%
2002 / 2003	138,685	7%
2003 / 2004	Not collected	
2004 / 2005	169,101	22%
2005 / 2006	187,693	11%
2006 / 2007	209,593	12%
2007 / 2008	231,326	10%
2008 / 2009	257,110	11%
2009 / 2010	249,842	-3%
2010 / 2011	278,850	12%
2011 / 2012	306,276	10%
2012 / 2013	329,274	8%
2013 / 2014	358,186	9%
2014 / 2015	412,602	15%
2015 / 2016	424,032	3%
2016 / 2017	472,630	11%
2017 / 2018	454,164	-4%
2018 / 2019	511,642	13%
Last three years (13/14 to 16/17)		+21%
Start of statistics to date		+400%

Rail year (ends March in last year noted)	Entries / exits	Growth / decline
Oldfield Park (1,149th)		
1997 / 1998	111,442	n/a
1998 / 1999	120,705	8%
1999 / 2000	120,074	-1%
2000 / 2001	127,783	6%
2001 / 2002	137,593	8%
2002 / 2003	143,090	4%
2003 / 2004	Not collected	
2004 / 2005	150,225	5%
2005 / 2006	156,753	4%
2006 / 2007	177,275	13%
2007 / 2008	191,647	8%
2008 / 2009	217,400	13%
2009 / 2010	216,750	0%
2010 / 2011	239,576	11%
2011 / 2012	252,934	6%
2012 / 2013	281,622	11%
2013 / 2014	305,984	9%
2014 / 2015	312,946	2%
2015 / 2016	315,070	1%
2016 / 2017	313,236	-1%
2017 / 2018	305,390	-3%
2018 / 2019	322,654	6%
Last three years (13/14 to 16/17)		+2%
Start of statistics to date		+190%

Rail year (ends March in last year noted)	Entries / exits	Growth / decline
Freshford (1,971st)		
1997 / 1998	18,255	n/a
1998 / 1999	17,182	-6%
1999 / 2000	15,626	-9%
2000 / 2001	19,549	25%
2001 / 2002	19,073	-2%
2002 / 2003	18,757	-2%
2003 / 2004	Not collected	
2004 / 2005	20,711	10%
2005 / 2006	20,779	0%
2006 / 2007	23,448	13%
2007 / 2008	25,552	9%
2008 / 2009	31,604	24%
2009 / 2010	30,796	-3%
2010 / 2011	33,456	9%
2011 / 2012	37,280	11%
2012 / 2013	39,160	5%
2013 / 2014	40,148	3%
2014 / 2015	44,414	11%
2015 / 2016	43,160	-3%
2016 / 2017	45,468	5%
2017 / 2018	44,732	-2%
2018 / 2019	53,368	19%
Last three years (13/14 to 16/17)		+24%
Start of statistics to date		+192%



4 General public views

It is very important that the views of people within the area are obtained about the service provided by hackney carriage and private hire. A key element which these surveys seek to discover is specifically if people have given up waiting for hackney carriages at ranks (the most readily available measure of latent demand). However, the opportunity is also taken with these surveys to identify the overall usage and views of hackney carriage and private hire vehicles within the study area, and to give chance for people to identify current issues and factors which may encourage them to use licensed vehicles more.

Such surveys can also be key in identifying variation of demand for licensed vehicles across an area, particularly if there are significant areas of potential demand without ranks, albeit in the context that many areas do not have places apart from their central area with sufficient demand to justify hackney carriages waiting at ranks.

These surveys tend to be undertaken during the daytime period when more people are available, and when survey staff safety can be guaranteed. Further, interviews with groups of people or with those affected by alcohol consumption may not necessarily provide accurate responses, despite the potential value in speaking with people more likely to use hackney carriages at times of higher demand and then more likely unmet demand. Where possible, extension of interviews to the early evening may capture some of this group, as well as some studies where careful choice of night samples can be undertaken.

Our basic methodology requires a sample size of at least 200 to ensure stable responses. Trained and experienced interviewers are also important as this ensures respondents are guided through the questions carefully and consistently. A minimum sample of 50 interviews is generally possible by a trained interviewer in a day meaning that sample sizes are best incremented by 50, usually if there is targeting of a specific area or group (e.g. of students, or a sub-centre), although conclusions from these separate samples can only be indicative taken alone. For some authorities with multiple centres this can imply value in using a higher sample size, such as 250 if there are two large and one moderate sized centre.

It is normal practice to compare the resulting gender and age structure to the latest available local and national census proportions to identify if the sample has become biased in any way. More details of the results of the on-street responses are included in Appendix 5.

More recently, general public views have been enlisted from the use of council citizens' panels although the issue with these is that return numbers cannot be guaranteed. The other issue is that the structure of the sample responding cannot be guaranteed either, and it is also true that those on the panel have chosen to be there such that they may tend to be people willing to have stronger opinions than the general public randomly approached.

Finally, some recent surveys have placed an electronic copy of the questionnaire on their web site to allow interested persons to respond, although again there needs to be an element of care with such results as people choosing to take part may have a vested interest. Neither of these options were used for the B&NES survey (either previously or in this 2020 survey).

As in previous years, the question began with a screening question seeking to focus the questionnaires only on those that live in the B&NES area. This is principally to screen out the large number of tourists whose opinions on licensed vehicles are not relevant to this study which focusses more on day to day usage.

The survey was undertaken on Wednesday and Thursday 4th and 5th March 2020 in the central area of Bath. A wide range of locations were used including locations near the active ranks and around the main shopping areas. In total, 158 interviews were obtained, slightly short of the target of 200 partly related to the usage of the screen question which reduced the overall number of interviews that can be achieved, but still sufficient to provide a robust indicative view of local public attitudes towards the licensed vehicle service experienced by the local B&NES population. However, this was higher than the 122 completed in the last survey.

The interviewed sample saw more females interviewed than the local estimate of 2020 population suggests. 45% of those interviewed were male compared to an expected 49% in the population estimates. This was the same as in 2017. In terms of age structure, the sample saw more mid-age group than the census estimate, with 20% of the lower age group (29% in census), 45% of the mid (compared to 33%) but a very similar level to that expected for the older group, 36% compared to 37%. In 2017 it was the older group that was over-represented but the younger group even more under-represented than this time.

Confirming the impact of the screen question, everyone confirmed that they lived in the B&NES council area.

51% of the sample said they had regular access to a car. In 2017 this was 62%.

Of those interviewed, all those interviewed told us if they had used a licensed vehicle in the last three months in the B&NES area or not. 60% said they had. This was very similar to the 62% three years ago.

Of these, the largest proportion, 23% said they had used them once or twice yearly, followed by 22% less than once a month but more than twice a year. 13% said once or twice weekly, although 17% said they never used them at all.

Allowing for average usage for each category above, it is estimated that each person makes 1.3 licensed vehicle trips per month. When the similar question was asked, but focussed on hackney carriages only, the similar estimate is 0.5 hackney carriage vehicle trips per person per month, 41% of the total for licensed vehicles in total (see further below). Both values are lower than in 2017 when the respective levels were 2.2 and 1.2 with proportionate reduction in the share of hackney carriage usage from 55%. This suggests overall reduced levels of total licensed vehicle usage, but a larger hit for the hackney carriage trade, potentially from increased competition from other sources.

Almost all interviewees told us how they normally got a licensed vehicle in the B&NES area. 47% said telephone, 5% a freephone and 13% an app, giving a total of 65% by potentially non hackney carriage methods. 35% said rank (reduced from the 42% of 2017) whilst 1% - about the national average - said they got one by hailing (reduced from 4% in 2017). The total of 36% directly by hackney carriage is relatively similar to the 41% estimate based on the stated frequencies of usage. Both are reduced from the previous survey.

A key change since the last survey has been the strong rise in use of apps, further comment about which is made below.

People were then asked to say which companies they used when booking a licensed vehicle by phone. Two thirds of those interviewed told us at least one company they phoned (the same level as in 2017). Some also said they used apps, with some people telling us they exclusively used apps when obtaining a vehicle. One person said they used three different phone numbers or an app. One other person gave three phone company names. Of those giving company names, 28% gave two names with the remainder giving just one. This suggests only modest levels of competition in terms of number of companies, and reasonable satisfaction with the company used meaning people mainly name just one company.

In terms of companies named, just two take 93% of all mentions (slightly down from the 97% of 2017), although both have long been under one umbrella (though the most commonly named is not the main company name). Seven other companies were named, but the most for any in terms of mentions was just 2% of the total. In effect, this shows a very strong private hire company and only minor competition.

People were also asked if they used an app or website. 22% of those interviewed said they did, with 91% of these saying they used a large national app. The other 9% of mentions were for the two, now merged major companies.

In terms of specific use of hackney carriages, most people provided a response. Just 3% of these said they could not remember seeing a hackney carriage vehicle in the area, a good response suggesting hackney carriages are distinctive to those interviewed. This was exactly the same as in 2017. However, a further 44% (45% in 2017) said they could not remember when they had last used a hackney carriage in the area, although this is lower than in many places. The highest score for actual usage frequencies was 25% saying they used them once or twice yearly. However, 8% did say once or twice weekly, but no-one said they used hackney carriages three times or more per week.

88% of those interviewed told us at least one rank they were aware of, and if they used it or not. Again, this was very similar to 2017 (89%). Several did not say if they used the rank or not, in which case it was assumed they did not use it. 14% of those giving answers named three locations. 55% named two and 31% named just a single location.

There were two main locations named. Orange Grove gained 43% of mentions (effectively the same as 2017) whilst the station gained 41% (was 44% for the last survey). Many places gained several different names although the top next location was a private hire office (gaining 7% in total and three different names). One other actual rank named had possibly five other names and took in total 5% - the Westgate Buildings location, although not correctly named at all (but at a similar level to 2017). Henry Street was also named once as the Marks and Spencer rank although that person said they knew of it but did not use it.

Of all the mentions made, 47% of the mentions were also confirmed as being locations that the person both knew of and used. This was reduced from the 52% saying they used them in 2017, which partly accounts for the reduced overall usage mentioned above in the number of trips made.

There were just nine people who told us of reasons they did not use ranks, although there were a number of reasons given. In total the most regular reason for not using ranks was because people phoned or pre-booked vehicles.

People were asked to give their views on the last licensed vehicle trip which they made either by hailing or taking a vehicle from a rank, i.e. gaining specific views about use of hackney carriages. 54% of all those interviewed chose to provide answers for these questions. A similar set of questions were asked, but about vehicles people had phoned for or used an app for, in which case 68% of those interviewed responded.

For both questions, the overarching response was 'very good' scores across the board. In both cases, the lowest response for very good (but still the overall highest response) was for price. Interestingly the result for both types of hire was very similar, although the booked trip had some 'very poor' whilst the hailed or rank-based trips had no very poor but a higher number of 'poor' scores. The only area in which hackney carriages scored better than booked trips was for driver knowledge, where the rank or hail hire score was marginally higher for very good than that for the booked trip.

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

A further question was asked identifying things that might encourage people to use hackney carriages or increase their usage of them. The top proportion of responses was 32% for people who said 'other' but then said if the price was cheaper. This proportion had been 41% in 2017. 15% said more hackney carriages they could get by phone (increased from the 9% of 2017). 11% said more hackney carriages they could hail or get at a rank, reduced from the 2017 level of 17%. However, 13% said other – nothing would encourage me to use them or use them more, not high but third highest in the list.

There were seventeen other suggestions given, few with high scores, but amongst them 5% did say if they could pay for hackney carriages using an app. This scored slightly higher than having more helpful drivers (4%).

Just over a third told us how either they, or people they knew, obtained a licensed vehicle if it needed to be adapted in some way. A resounding 96% said they would pre-book the vehicle, with just 2% saying they would get it at a rank and 2% by using an app.

Most people told us if they, or anyone they knew, needed an adapted licensed vehicle. 82% said they, or someone they knew, did not. This is relatively low compared to other areas, suggesting relatively high potential need for adapted licensed vehicles. It is also a higher level of need than in 2017 (87% then). In terms of split between wheelchair accessible style and other adaptations, the bulk of response was in favour of WAV, mainly for people they knew.

46% of those interviewed told us their views about if people in B&NES that had disabilities got a good service from hackney carriage vehicles and drivers. 42% felt they did. However, 49% said they did not know.

People were asked questions to identify, using industry standard and court-agreed methods, their level of latent demand for use of hackney carriages in the B&NES area. They were invited to say if they had given up waiting for a hackney carriage either at a rank or by hailing, and if they had, where this had occurred. Three quarters of people responded to this question with 21% saying they had given up waiting at a rank. Of these, there were 10 responses at the station and 11 at Orange Grove with the remainder of places not actual rank locations. For hailing, just 3% said they had given up, with one general response and one each for the two main active ranks.

Assuming all that did not respond had not given up waiting either at a rank or to hail, the overall latent demand value for rank and hail is 15%, or a value of 1.15. If the station value is taken separately, the council rank value is 8% and the station 7%, 1.08 and 1.07 respectively. The council level is higher than the 5.7% of 2017 but the station level is significantly reduced from the 20% of 2017, again suggesting improvement for some reason of service at the station.

These figures are supplemented by 53% of those interviewed telling us that 80% of them considered there were enough hackney carriages overnight, between 19:00 and 07:00.

Most responded to if they felt safe using licensed vehicles. 96% did in the daytime falling to 88% at night. The key matter that might make people feel safer was female drivers. Eleven other suggestions were made many of which involved travelling with someone else or ways by which their trust of the driver could be increased, such as information who the driver was in advance and confirmation they had been checked by the Council.

All responded to the question how people rated local hackney carriage fares. 46% felt them fair and 35% felt them expensive. 15% did not have any opinion.

Nearly all told us about their reaction to being able to use an electric hackney carriage. 66% had no preference, 20% said they would use it as long as it did not raise costs, and 13% would use it and consider paying more to do so.

Again, nearly all told us their views of card machines to pay fares. 40% said they would still pay cash whilst 39% said they would use this option for every journey. A further 20% would use, again as long as it did not somehow inflate fares.

Nearly all told us how their use of licensed vehicles had changed in the last three years. 24% said they used them more, 19% said they used them less (29% in 2017) and 57% said usage was about the same.



5 Key stakeholder consultation

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

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

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

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

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

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

Further listing of who has responded and how is provided in Appendix 6 but ensuring privacy where appropriate for those contacted. An attempt to contact most during July 2020 found very few feeling able to make any comment.



6 Trade stakeholder views

The department for Transport Best Practice Guidance (BPG) encourages all studies to include 'all those involved in the trade'. There are a number of different ways felt to be valid in meeting this requirement, partly dependent on what the licensing authority feel is reasonable and possible given the specifics of those involved in the trade in their area.

The most direct and least costly route is to obtain comment from trade representatives. This can be undertaken by email, phone call or face to face meeting by the consultant undertaking the study. In some cases, to ensure validity of the work being undertaken it may be best for the consultation to occur after the main work has been undertaken. This avoids anyone being able to claim that the survey work was influenced by any change in behaviour.

Most current studies tend to issue a letter and questionnaire to all hackney carriage and private hire owners, drivers and operators. This is best issued by the council on behalf of the independent consultant. Usual return is now using an on-line form of the questionnaire, with the option of postal return still being provided, albeit in some cases without use of a freepost return. Returns can be encouraged by email or direct contact via representatives.

Some authorities cover private hire by issuing the letter and questionnaire to operators seeking they pass them on when drivers book on or off, or via vehicle data head communications.

In all cases, we believe it is essential we document the method used clearly and measure response levels. However, it is also rare for there to be high levels of response, with 5% typically felt to be good and reasonable. B&NES keep in touch with their drivers by text and issued 672 texts with the link to the on-line survey. After removing some duplicate responses there were 111 valid responses, a high response of over 16%. This was higher than the 7% from last time and the 4% from the previous survey to that, showing a trend of increasing inputs.

The survey was issued in the last week of February 2020, with the survey left open until 4th May. When the Covid-19 pandemic led to a full lockdown, the questionnaire was amended to ask drivers to provide information about their work during a typical week in mid-February to mid-March, i.e. before the impact of the lockdown.

The present licensed vehicle fleet is made up of 23% zone 1 hackney carriages, 5% zone 2 hackney carriages and 72% private hire. All drivers can drive whichever vehicle is appropriate to them. Of the responses, 62% were private hire and 38% hackney carriage. This is a good response from all parts of the trade with only a marginally increased level from hackney carriages. Often private hire drivers tend to ignore such surveys, so this is a positive result. The private hire response has strengthened since the last survey.

General statistics were reviewed for those responding. For the hackney carriage respondents, the average length of service with the B&NES trade was 16 years, for private hire this was 11 years. The average was 13 years, again an increase on the last survey albeit of one year. This time there is a stronger difference between private hire and hackney carriage compared to the little difference three years ago.

For the full sample, the most frequent number of days worked was six (41% of respondents) (very similar to the previous 44%), although 23% said they had not worked in the week previous. Average days worked were five for hackney carriage and four for private hire. Similarly, average hackney carriage working hours were 42 compared to 34 for private hire, and 37 for the full sample. This is again a reduction from the previous survey, showing a continuing trend of reducing hours worked.

86% of all those responding owned their own vehicle (very similar to the 87% of the last survey). This proportion was slightly higher for private hire (88% compared to 83% for hackney carriage) but not significantly so. Just 14% said someone else drove their vehicle, a reduction from the 20% of last time.

The split between those operating on a radio circuit and those not was 50/50. 79% of all responses were for one large private hire company, followed by 12% for another, 4% for a large national organisation, 4% for another company and 2% for a zone 2 company. This proportion was increased strongly from the last survey suggesting the main company is now even more dominant.

However, as might be expected, when reviewed considering the two separate trades, 70% of the hackney carriages did not work on a circuit, although the split between companies was very similar between the two fleets. The level of hackney carriages on circuits had reduced from the 52% of last time to 30% now. 36% of private hire said they did not operate on any circuit. Two of these said they were chauffeur operations whilst one said they principally worked via an app.

All the hackney carriage respondents told us the ranks they used. Many gave multiple responses. The top directly named rank was Bath Spa station with 23% of responses. However, 20% said 'Abbey' with a further 14% saying Orange Grove making the total for that rank 34%. 14% said George Street and 13% Westgate Buildings. 9% simply said 'all'. 4% said Kingsmead Square where there is no active rank. 4% said Midsomer Norton. The two main ranks saw more people quoting them than in the previous survey.

80% felt the limit on hackney carriage vehicle numbers remained correct (a marginal increase from the 78% of the previous). 22% said if the limit was removed, they would leave the trade altogether. 33% said they would have no reaction. 5% said their reaction to removal of the limit would be working longer hours. 11% said they would transfer from a private hire vehicle to owning their own hackney carriage.

23% gave reasons they thought the limit benefitted the public. Of these, 39% felt it limited public waiting times, 35% felt it ensured customer service and standards were maintained and 22% felt it reduced potential pollution and congestion. 4% said it meant better local knowledge in the more stable set of drivers.

Many provided other comments, mainly that there were too many hackney carriages. Several mentioned out of town or competition from apps further eroding work levels. One said their income had gone down since the further plates had been added. Many were concerned about apps and out of town appearing to take a lot of work. One suggested the limit should be removed, but many more confirmed there were more than enough vehicles. Two mentioned the issue of high rents they felt were made possible by the vehicle limit. A large number effectively told us they felt the current system worked well.

Again, the driver survey supports the view that work for local hackney carriage and private hire has continued to reduce, with it felt that external competition has increased further.

Review of the periods worked found that the overall fleet saw 39% of periods worked being the afternoon, 29% the morning, 21% the evening and 11% the early hours. The trend was that hackney carriages tended to work more periods than private hire whilst within our sample, private hire provided a higher proportion of the overall cover with some evidence that more private hire tended to service overnight periods than hackney carriage from our responses.



7 Evaluation of unmet demand and its significance

It is first important to define our specific view about what constitutes unmet demand. Our definition is when a person arrives at a hackney carriage rank and finds there is no vehicle there available for immediate hire. This normally leads to a queue of people building up, some of whom may walk off (taken to be latent demand), whilst others will wait till a vehicle collects them. Later passengers may well arrive when there are vehicles there, but because of the queue will not obtain a vehicle immediately.

There are other instances where queues of passengers can be observed at hackney carriage ranks. This can occur when the level of demand is such that it takes longer for vehicles to move up to waiting passengers than the time it takes for passengers to board and vehicles to move away. This often occurs at railway stations but can also occur at other ranks where high levels of passenger arrivals occur. We do not consider this is unmet demand, but geometric delay and although we note this, it is not counted towards unmet demand being significant.

The industry standard index of the significance of unmet demand (ISUD) was initiated at the time of the introduction of section 16 of the 1985 Transport Act as a numeric and consistent way of evaluating unmet demand and its significance. The ISUD methodology was initially developed by a university and then adopted by one of the leading consultant groups undertaking the surveys made necessary to enable authorities to retain their limit on hackney carriage vehicle numbers. The index has been developed and deepened over time to take into account various court challenges. It has now become accepted as the industry standard test of if identified unmet demand is significant.

The index is a statistical guide derived to evaluate if observed unmet demand is in fact significant. However, its basis is that early tests using first principles identified based on a moderate sample suggested that the level of index of 80 was the cut-off above which the index was in fact significant, and that unmet demand therefore was such that action was needed in terms of additional issue of plates to reduce the demand below this level, or a complete change of policy if it was felt appropriate. This level has been accepted as part of the industry standard. However, the index is not a strict determinant and care is needed in providing the input samples as well as interpreting the result provided. However, the index has various components which can also be used to understand what is happening in the rank-based and overall licensed vehicle market.

ISUD draws from several different parts of the study data. Each separate component of the index is designed to capture a part of the operation of the demand for hackney carriages and reflect this numerically. Whilst the principal inputs are from the rank surveys, the measure of latent demand comes from the public on-street surveys, and any final decision about if identified unmet demand is significant, or in fact about the value of continuing the current policy of restricting vehicle numbers, must be taken fully in the context of a careful balance of all the evidence gathered during the survey process.

The present ISUD calculation has two components which both could be zero. In the case that either are zero, the overall index result is zero, which means they clearly demonstrate there is no unmet demand which is significant, even if other values are high.

The first component which can be zero is the proportion of daytime hours where people are observed to have to wait for a hackney carriage to arrive. The level of wait used is ANY average wait at all within any hour. The industry definition of these hours varies, the main index user counts from 10:00 to 18:00 (i.e. eight hours ending at 17:59). The present index is clear that unmet demand cannot be significant if there are no such hours. The only caveat on this component is that the sample of hours collected must include a fair element of such hours, and that if the value is non-zero, review of the potential effect of a wider sample needs to be considered.

The other component which could be zero is the test identifying the proportion of passengers which are travelling in any hour when the average passenger wait in that hour is greater than one minute.

If both of these components are not -zero, then the remaining components of the index come into play. These are the peakiness factor, the seasonality factor, average passenger delay, and the latent demand factor.

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

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

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

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

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

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

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

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

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

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

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

A further test was undertaken for the Bath Spa station rank alone. Interestingly, there were no passengers at the station observed to have any average passenger delay longer than a minute. This means the ISUD value for the station on its own for this survey would be zero. The average passenger delay for the station is 0.07 minutes, or just four seconds. This is a large difference to that from previous surveys, perhaps resulting from the lower February demand likely at the station.

Apart from the seasonal value, which needs to be 1.2 to allow for the rank data being collected in a low demand month, i.e. February, all elements of the index have reduced consistent with the reduction in overall demand for hackney carriage services observed. The index is now the lowest it has been apart from 2011 when no off-peak queues set the index to zero.

This confirms that the limit policy can be retained, and that the level of licences is set at an appropriate level that does not need any review.

8 Summary, synthesis and study conclusions

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

Background and context

This survey began with appointment on the basis of our November 2019 proposal with an inception on 23 January 2020. At that meeting the decision was made to collect all information as far as practicable during February 2020, with driver and key stakeholder consultation following the on-the-ground survey work. The key observations were therefore undertaken during February and very early March 2020. This was fortuitous given the onset of the Coronavirus pandemic which brought a halt to all on-ground survey work at the end of March 2020.

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

A key focus is increasing and transforming connectivity, enabling seamless door to door journeys, especially for those with mobility needs. It is acknowledged that hackney carriage and private hire can improve connectivity at all levels of transport need. They can be a critical part of longer journeys as well as being ideal in providing complex journeys. The policy is aware of developing on-demand services and the opportunities for improving air quality.

All this occurs against a background of some 6% growth in population levels in the years since the last survey.

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

In the period since 1994 there have been three plate issues (18, 2004, 15 in 2007 and three after the 2014 survey). Compared to this, outer zone hackney carriages are reducing steadily but private hire vehicle numbers continue to increase gently.

All drivers can drive either hackney carriage or private hire vehicles. After decline of driver numbers to the point of the 2017 survey, they have since been growing steadily. Private hire operator numbers have also seen growth recently suggesting continued competition within private hire, which has a knock-on effect towards hackney carriage usage.

Levels of wheelchair accessible vehicles are 13% within the zone 1 hackney carriage fleet and 4% across the full vehicle fleet, compared to 14% for the national average for all vehicles (but including many fully WAV style hackney carriage fleets). The overall level of provision is towards average but slightly below.

Recent local app usage had risen to 27.9% for the major local app company for February 2020, consistent with our rank and on street surveys. The actual number of bookings for that company had risen by 1% comparing February 2020 with February 2019.

Rank observations

Ranks in February 2020 were the same as in the previous survey. Adding the benefit of more recent improvements in methodology saw observed hours increased to 286 hours of observation across the ranks in the City. In terms of overall actions observed at each rank, the top two ranks saw 38% and 36% of all activity respectively, with Bath Spa station having the highest followed by the Abbey rank. The four other ranks observed saw 10% at Westgate Buildings, 8% Southgate Street, 7% George Street and 1% at the Henry Street rank. Most apparent passenger walk-aways occurred at the Bath Spa station rank. In terms of total vehicle movements, similar proportions were identified although the Abbey rank had marginally higher levels of vehicle activity.

Although there was some private car abuse of ranks, this focussed on the smaller ranks with Southgate Street and George Street suffering worst. The effect is heightened by the difficulty in accurately marking part time ranks.

Estimates of average weekly demand for all ranks suggest some 10,737 passengers at this time. This is 27% less than in 2017, but still more than levels observed in 2008. Bath Spa Station rank now provides 50% of estimated weekly passengers. The Abbey rank is second, but with a lot less share now (22%) than in any previous survey. The Westgate rank, however, appeared to see more passengers, some 15% share compared to 5% in 2017, with Southgate Street and George Street also gaining actual usage and share, albeit at very low overall levels (225 passengers at Southgate Street).

As is typical, Friday and Saturday passenger levels are higher than on Thursdays. However, there were always passengers at a rank at some location in the area throughout our observed times. The Saturday peak hour is five times the average hourly passenger flow with the Friday night peak about two thirds of the Saturday level. Both peaks are in the 22:00 hour. Bath Spa station rank has generally high flows most of the afternoon and evening on the Friday with Saturday demand tending to rise through the day to a peak late evening.

The Abbey rank sees more demand at night compared to the Bath Spa station location. This rank sees several peaks on all three days, with the most pronounced usage in the Saturday night peak hour. Interestingly, the peak demand on Saturday seems to be shared between several locations which implies a larger fleet being required to meet the same level of demand. Westgate Buildings rank tends to begin usage early afternoon whilst the other two ranks at Southgate Street and George Street are used in their night operational hours.

With respect to average passenger delay, just 10% of all observed hours had any observed delay. The existence of average passenger delay levels of a minute or more applied to just 1% of all observed hours. The longest observed passenger wait was 14 minutes, with that hour being the third highest level of average passenger delay (at Westgate Street rank). The other over a minute average passenger delays were at Southgate Street but at times when overall demand was low, termed 'thin demand'. Overall, this demonstrates that existence of unmet demand in the area is very low.

Interestingly, for this survey, there was no average passenger delay of a minute or more at the private Bath Spa station rank. This may reflect the lower levels of tourist demand occurring in February. However, this location saw the most passengers appearing to walk away from the rank although in total the walk-aways were no more than 1% of total passenger movements.

The sample vehicle activity surveys found 73% of all available hackney carriages observed on the busiest day of the survey. The highest level in any period was 59% in the 22:00 to midnight period. Considering the Abbey rank, 68% of the fleet was seen there whilst 37% was observed at the station rank. 7% of the fleet were only seen at the station whilst 43% were seen at or near both locations. Plates at the Station seemed to be more active. Very late night activity of vehicles tends to be the lowest with focus of most vehicles on the busiest rank hours as might be expected.

There appears to be headroom available in the fleet for vehicles to provide for higher levels of flow if needed.

18% of the vehicles observed appeared to be WAV style compared to the 13% actually in the fleet. The level of actual WAV usage at ranks was very low with just one person at each of the Abbey and Station ranks during the course of the survey. The level of visibly disabled usage (but not wheel chair using) was higher.

No new marshal data was available, although inspection of the previous data suggested the difference in overall flows at the Abbey rank between February and October was minimal.

Using the national station passenger statistics suggests that about 10% of Bath Spa station passengers leave the station in a hackney carriage from the rank there. Bath has the 78th highest passenger flows in UK stations.

On street public views

A robust and broadly census comparable set of interviews in the streets of Bath covering only people living in the B&NES area found 60% saying they had used a local licensed vehicle in the last three months, very similar to the 2017 level of 62%. Frequencies quoted suggest 1.3 licensed vehicle trips per person per month compared to 0.5 for hackney carriages. Overall usage is reduced from the levels of 2.2 and 1.2 from 2017 with decline in hackney carriage usage strongest. This is confirmed by people saying 35% used ranks (42% in 2017). Hailing had also reduced from 4% to 1%. In terms of companies used, the top two names that are the same company obtained 93% of all mentions.

The survey identified a strong rise in app usage. This accounted for 13% of the ways people obtained licensed vehicles. 91% said they used national apps and 9% the local ones.

Whilst a very low percentage could not remember seeing a hackney carriage vehicle in the area, suggesting very good appreciation and distinctiveness, 44% could not remember when they had last used them. Both statistics were almost the same as in the previous survey.

People mainly knew the two main ranks, with just under half saying they used the location they mentioned. Other ranks were known about but less precisely and with varying names. The level saying they used ranks they were aware of was reduced from 2017.

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

Price was a key determinant that might increase hackney carriage usage although some said if they could get a hackney carriages using an app.

96% said if they needed a WAV they would pre-book it. The level of those needing a WAV was higher than in many places. 42% of people felt that those with disabilities got a good service from hackney carriages in the area.

Latent demand was higher than in 2017 for the council ranks (8% compared to 5.7%) but lower for the station (7% not 20%). 80% felt there were enough hackney carriages overnight. 96% in the day and 88% at night felt safe using hackney carriages.

46% felt fares were 'fair' and 35% felt them expensive.

20% would use an electric vehicle as long as it did not cost more whilst 13% would use one even if they had to pay up to 10% more.

39% would use card machines to pay their fares, with a further 20% using as long as it did not increase fares, whilst 40% would still pay cash.

24% said they now use licensed vehicles more, 19% said less with 57% feeling use was about the same. This implies overall increase in usage.

Key stakeholder views

No key stakeholders made any comments.

Trade views

The trade survey was issued by the council using their proven method to contact all drivers. It was issued in the last week of February with a reminder issued once the pandemic lockdown occurred that people should respond for their operation before that time. 16% of drivers responded, higher than the return level of 7% in 2017.

62% of response was from those saying they drove private hire. Average length of service was slightly greater than at the last survey. Hackney carriage average days worked were five with four for private hire, with hours being 42 and 34 respectively.

A similar 86% of respondents to the previous survey owned their own vehicle. A reduced level of 14% (from 20% last time) said someone else also drove their vehicle.

70% of hackney carriage respondents were independent, with the level of hackney carriages saying they worked with bookings reducing from 52% to 30%. 36% of private hire did not use bookings with several chauffeur operations responding together with a number saying they worked by app only.

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

A marginally increased 80% felt the limit remained correct. 5% said if the limit was removed they would work longer hours, but 22% said they would leave the trade in that situation. 11% however would get a hackney carriage plate transferring from private hire.

Those responding gave the main benefit of the limit that it limited public waiting times (39%) whilst 35% felt it ensured customer service and high standards with 22% saying it reduced pollution and congestion. 4% felt it gave better local knowledge for the more stable driver levels.

Overall other views were concerning there being too many hackney carriages and continued increase in competition, particularly from apps.

Formal evaluation of significance of unmet demand

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

In general, all elements of the index compared to 2017 have reduced, apart from the change of the seasonal factor to 1.2 to reflect surveys in February. The council rank-only latent demand has increased whilst the overall and station values have reduced. Overall, the current council only ISUD index has increased, but only to 1.86, whilst the overall value including the private station operation has reduced from 45 to 0.73.

These values all confirm that the limit policy has the option of being retained, and confirms that the level of vehicle licences is at an appropriate level that does not require review. The overall trend – logical given the reduced level of demand – is away from the level trending towards becoming significant.

Synthesis

The area has seen the continued trend towards reducing levels of demand for hackney carriages at ranks. This is despite people being happy with service they receive from hackney carriages, and from people being aware that they exist. The principal change appears to be the impact of both national and local apps providing a more accessible service in that people do not have to go to ranks to obtain vehicles.

However, there has been a minor benefit to the hackney carriages in that, with people being more aware they can get a licensed vehicle nearer where they are, lesser-used ranks have seen some increase in usage, albeit modest. This suggests that business-savvy hackney carriage operators can gain both from direct introduction of apps but also from making themselves more available for hire by waiting at ranks and being available for hailing. This would allow them to gain from the uplift in usage implied by the convenience of app-style operations.

Conclusions

The lack of any unmet demand which is significant means that the policy retaining a limit on hackney carriage vehicle numbers can be retained. Further, there is no evidence of any need for further plates and the current level can be retained.

The popularity of apps, and slight increases in use of the smaller ranks suggests there would be value in better marketing of the location of these ranks, and encouragement to passengers that they can also hail hackney carriages. However, the hackney carriage trade would also do well to seek opportunities to be allied to app systems to give them the best opportunities for hire.

9 Recommendations

On the basis of the evidence gathered in this taxi unmet demand survey for the Bath and North East Somerset central Bath zone, our key conclusion is that there is no evidence of any unmet demand for the services of hackney carriages either patent or latent which is significant at this point in time in the licensing area.

This permits the committee to determine to retain the limit and be able to defend this if required. The level of vehicles is also sufficient to meet demand and there is no need to add any further plates at this time.

Retention of the limit requires repeat of this survey with fresh surveys no later than three years from the date of this snapshot. However, given the very low level of unmet demand and the very low ISUD index, the option of having repeat surveys at any time up to October 2023 should be secure, unless any significant changes occur.

Given the significant change implied by the Coronavirus pandemic, leading to a 'new normal' it would be prudent for further research to identify the likely impact of this on both vehicle supply as well as demand. For example, a recent study identified that 58% of people asked about their future use of licensed vehicles said they would use them about the same amount. 23% said they would use them less and 14% said they would use them more, with 5% uncertain. This would suggest about a 10% reduction in licensed vehicle usage (although based on a location with a fully WAV accessible hackney carriage fleet).

The latest information suggests that whereas shopping-based demand is resurging fairly swiftly, and night-demand based more slowly (and night club based unlikely to return for some while), demand linked to rail connections is most likely hardest hit and the slowest to return, with some suggesting it may be several years before rail demand returns to its previous heights. This relates to both concern over the risk of exposure to the virus (although evidence is mounting that rail-based infection rates are very low), but more to the strong life-style change towards reduction in commuting flows and to a lesser extent business meetings. Tourist and shopping-based demand are however, likely to resurge more rapidly.

For Bath, with half the hackney carriage estimated demand being from the station, this is likely to be the most severe future demand change moving forward.

A further negative impact on hackney carriages might be the gain of extra private hire drivers choosing to try serving the public in private hire vehicles arising from them being made available for work. Many of these might choose to work for apps to provide them with flexible working.



Appendix 1 – Industry statistics

Bath and North East Somerset

	hcv	hcv Bath zone	phv	lv total	total driv (all dual)		Ops	% hcv WAV	hcv WAV% for Bath zone only	% phv WAV
1994D	96	89			373	1994D				
1997D	123	89	178	301	478	1997D		13		
1999D	130	89	200	330	456	1999D	56	5		
2001D	117	89	212	329	525	2001D	36	6		
2004D	148	89	248	396	505	2004D	56	8		
2005D	131	107	260	391	516	2005D	80	10		
2007D	163	107	273	436	585	2007D	65	15		
2009D	153	122	367	520	654	2009D	95	13		
2010N	171	122	372	543	<u>666</u>	2010N	<u>77</u>	16		-
2011D	162	122	333	495	678	2011D	59	13		
2012N	171	122	348	519	<u>660</u>	2012C	<u>72</u>	11		<u>1</u>
2013D	175	122	347	522	642	2013D	85	11		1
2014N	161	122	337	498	<u>635</u>	2014N	<u>95</u>	12		<u>1</u>
2014C	153	122	334	487	627	2014C	<u>95</u>	13	15	<u>1</u>
2015D	159	122	348	507	592	2015D	104	11	15	1
2017D	157	125	376	533	644	2017D	82	13	16	1.9
2017C	161	125	361	522	644	2017C	82	12	16	1.9
2018D	157	125	397	554	683	2018D	97	11	14	1.3
2019D	146	125	378	524	602	2019D	101	12	14	1.1
2020C	148	123	385	533	672	2020C	109	13	15	1



Appendix 2 – List of ranks



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		Near Marks and Spencer but rarely used
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	Administered for rail company with supplementary permit / charge.



Appendix 3 – Timetable of rank observations

Please see separate document

Appendix 4 – Detailed rank observation results

Please see separate document

Appendix 5 – Detailed on street interview results

Please see separate document



Appendix 6 List of Stakeholders consulted

Key consultee	Response
Supermarkets	
Sainsbury's Green Park	U
Waitrose, Podium	U
Morrison's London Road	U
M&S Weston Lock Bath Foodhall	U
Iceland Foods	U
M and S Central Bath	E
Hotels	
Abbey Hotel Bath	R
Halcyon Bar and Circo Bar	E
Harrington Hotel	E
Hilton National Hotel	U
Queensbury Hotel	E
Royal Hotel	A
Francis Hotel Bath	E
The Bath Priory	E
The Gainsborough Hotel Spa	E
Restaurants / Cafes	
Café Rouge	E
Wagamama	U
Wetherspoon King of Wessex	U
The Oven Pizzeria	E
Vino Vino Wine Bar	E
Carluccio's	Gone
Franky and Bennies	Gone
Garfunkels	Gone
Jimmys World	Gone
Entertainment	
Chapel Arts Centre	U
The Forum	U
Public Houses	
The Raven	E
The Bath Brew House	E
The Star Inn	U
Hall and Woodhouse	A
The Salamander	E
The Huntsman	E
Night Clubs	
Club XL	E
Moles	A

Po Na Na	A
Second Bridge Nightclub	E
Sub 13	E
The Common Room	E

Key:

U – no means to contact due to pandemic changed communication policy or lack of contact email or contact form (no phones were being answered)

E – email sent but no response received despite chasing

A – email sent and acknowledged but no other response

R – refusal, due to national policy on not providing local feedback

