Brighton and Hove City Council
Survey of demand for hackney carriage services

October 2018

Executive Summary

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

This latest in the regular series of reviews of the level of unmet demand in the Brighton and Hove licensing area was undertaken between February and October 2018. This review has included a test of demand in Spring as well as the main test undertaken at the same time as in the previous survey and has specifically considered the policies of increasing WAV levels and managed plate growth in addition to the more usual standard brief.

The authority continues to support development of the licensed vehicle fleet as an important part of the transport offer of the area. The managed growth of vehicle plates on the hackney carriage side appears to have mirrored private hire growth which is in theory purely provided by the market. The overall industry structure allows a lot of freedom in operating models but as a result is very complex. Recent changes to see drivers having licences allowing them to drive either private hire or hackney carriage has reduced some of this complexity.

The early period rank observations suggested lower demand levels at the two key council ranks and no evidence that demand might have increased to provide any option for unmet demand in the area to have become significant. A wider review of rank activity in May found some 27% less demand observed at ranks now compared to the similar period in 2015. Even this picture, however, was complex since some ranks had seen growth whilst the main decline was at the station rank. There had also been national reduction in usage figures for passengers at Brighton station although not to the level the main rank itself had shown decline.

The area continues to see rank activity at some location in nearly every hour of the week. The hackney carriage fleet continues to be active in plying for hire, often covering several quiet locations by passing by regularly. Unmet demand measured in various different ways was always low, with just 2% of observed hours seeing average passenger delays a minute or more, with just 20 passengers during the survey period waiting 11 minutes or more for a vehicle to arrive.

Observed levels of service were found to be provided by around 43% of the fleet on the busiest, Saturday. Within these observations, 17% were other than Brighton and Hove hackney carriages, although in effect just 4% were out of town vehicles. However, it is hard to capture all out of town activity since many find other locations to be active. This would have required much more extensive surveys.

Public interviews found a reduced level of usage of licensed vehicles, but a more marked decline for hackney carriages despite people finding them very obvious. The level of people not remembering using hackney carriages had significantly increased. Whilst app-based options had become the third highest way of 'booking' a vehicle, the top two booking companies still retain high levels of hackney carriages operating on their circuits. Peoples' knowledge of ranks appeared to have reduced. Latent demand had increased although so had levels of satisfaction with the service provided. It may be that increased latent demand is a result of higher levels of expectation.

The trade remains very responsive to assisting the study, both from the individual and from the trade body / company levels. Of those responding, few were entirely dependent on ranks. Levels of accepting pre-bookings, and of hailing were both high.

53% of all trade respondents in the driver survey supported the present managed growth policy. Private hire supported the policy most strongly, followed by owner-drivers and then those that rented, although the latter support was not much less than the overall levels. A key concern was trade being taken by non-Brighton vehicles.

The level of unmet demand and the index of significance of unmet demand itself were both the lowest seen in recent surveys.

Levels of WAV activity were higher at ranks than the actual proportion in the fleet. However, the level of observed wheel chair-based passengers remained similar to the levels in the last two surveys.

Overall, this survey suggests the rank-based market has reduced, although hailing has remained strong and the introduction of apps has also seen demand switch from various sources to their use. Recent introduction of a hackney carriage app has been positive although this remains in its early days. At this time, the level of confidence that unmet demand is unlikely to become significant is higher than ever. It also appears that continually improved levels of service have also increased user expectations.

The hackney carriage fleet at this time is less dependent on rank-based hires than it ever has been. While a case could be made that the extra five plates per year could be switched off, wider views suggest this level of plate issue continues to keep a reasonable balance between the hackney carriage and private hire sides of the trade. There is also scope for work levels to be increased with further reduction in the levels of inappropriately met demand that is tolerated.

Further, there is need to consider the upcoming issues of vehicle emissions within the mix of policies being used. It appears that the 'best' level of WAV for this area might be 50%, a level the fleet is now currently at, so that the focus of fleet change could now switch to encouraging improved vehicle emissions whilst ensuring the level of achievement on the WAV side remains.

Contents

1 General introduction and background

Brighton and Hove City 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 without revision to primary legislation.

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

Current hackney carriage, private hire and operator licensing is undertaken within the legal frameworks first set by the Town Polices Clause Act 1847. This has been 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. 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 vehicles' to refer to both hackney carriage and private hire.

The legislation around licensed vehicles and 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 three most recent reviews were by the Office of Fair Trading in 2003, through the production of the BPG in 2010, and the Law Commission review which published its results in 2014. None of these resulted in any material change to the legislation involved in licensing.

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

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

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

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

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

Some of the application has differed between Scottish and English authority's. This is mainly due to some court cases in Scotland taking interpretation of the duty of the licensing authority further than is usual in England and Wales, requiring current knowledge of the status of unmet demand at all times, rather than just at the snap-shot taken every three years.

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

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

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

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

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

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

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

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

In general, industry standards suggest that the determination of conclusions about significance of unmet demand must take into account the practicability of improving the standard of service through the increase of supply of vehicles. It is also 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.

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. However, the Report has no legislative backing and the key conclusion was that the Government needed to act firstly to revise the 2010 BPG but then to move to revisions to primary legislation as soon as practicable. 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.

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.

These 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.

2 Local background and context

Key dates for this Survey of demand for hackney carriage services for Brighton and Hove are:

- appointed LVSA on 22 January 2018
- in accordance with our proposal of January 2018
- as confirmed during the inception meeting for the survey held on 27th February 2018
- this survey was carried out between February and October 2018
- On street pedestrian survey work occurred in March and April 2018
- the video rank observations occurred in March and May 2018
- Licensed vehicle driver opinions and operating practices were canvassed by discussion with trade representatives (and an invite to all trade groups to provide input), and an all-driver questionnaire issued by the Council in paper format but returned to us either in paper or by use of an on-line portal
- Key stakeholders were consulted throughout the period of the survey
- A draft of this Final Report was reviewed by the client during October 2018
- and reported to the appropriate Council committee towards the end of 2018.

For the sake of clarity, it should be noted that LVSA – Licensed Vehicle Surveys and Assessment is a joint trading name for CTS Traffic and Transportation Ltd (CTS) and Vector Transport Consultancy, a name used since early 2017. The 2015 survey was undertaken by the same Project Manager as this study, but with CTS working as sub-contractors to Peter Brett and Associates (PBA) due to contractual arrangements by the Council at that time.

Brighton and Hove City Council is a unitary authority formed in 1997 and granted City status in 2001. It is within the former East Sussex county area of Southern England. The authority has a current population of 291,200 using the 2018 estimates currently available from the 2011 census. This is an increase from the 281,100 quoted during the last survey in 2015.

In terms of background council policy, Brighton and Hove City Council, with its unitary status has full control over background planning, transport and highway policy and activities. This means the council retains full control over provision of ranks, albeit within the highways section of the Council.

The LTP adopted by the City in March 2015, known as LTP4, remains current, as it was in 2015, providing a long-term strategy for delivering transport improvements ahead to 2030. The short-term delivery plan focussing up to 2018/19 is still being implemented.

The preparatory surveys for LTP4 sought identification of aspects important to people. 2.4% of respondents said that local taxis were the most important service to them. Less than 1% suggested they were most in need of improvement, suggesting a valued and appreciated service. During the course of this survey no evidence has been found to doubt this conclusion.

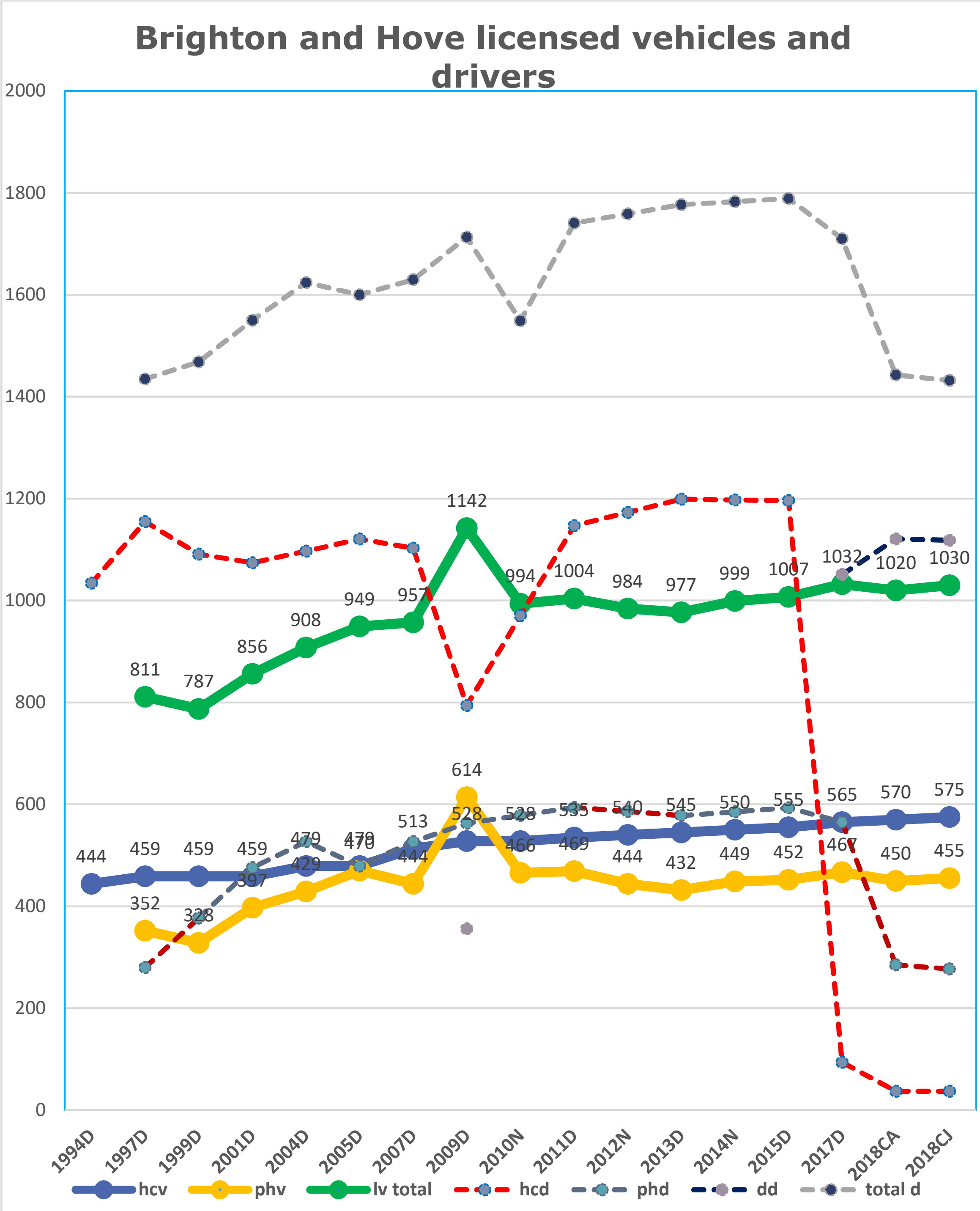
The City considers taxi ranks as one of a number of key vehicle/people interchanges which need investment to enhance neighbourhoods and destinations for people for whom there are key delivery programmes.

Brighton and Hove City has full powers over licensing the vehicles, drivers and operators serving people within their area. Brighton and Hove has chosen to utilize its power to limit hackney carriage vehicle numbers, and as far as we are aware has done so since 1986. It is one of the most rigorous councils with respect to undertaking reviews of its unmet demand policy, with previous tests undertaken and available from 2015 right back to 2003.

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. The current managed growth policy sees five extra hackney carriage licences issued each year, with the latest tranche having been issued and put on the road after our rank and on-street interviews had been completed.

The graph demonstrates the steady growth of hackney carriage vehicle numbers under the managed growth policy. This has seen an increase in the fleet of some 25% from 1997 to date. During that same period, private hire vehicle numbers, which cannot be limited and in theory should represent the market have grown 29%, although they did have a possible peak much higher in 2009, although that might be a statistical error. Private hire vehicle numbers had grown since the last survey, but then fell back, but have grown in the period since the survey was undertaken.

The major change since 2015 has been the introduction of dual licensing for drivers of vehicles. This is shown by the graph with sharp drops for the single options but with the overall impact being a drop in the total number on issue as duplication has now generally been removed. This therefore gives a much better reflection of the actual number of people available to drive the vehicles, since before there could be people with two licences, who of course could not drive both vehicles at the same time.

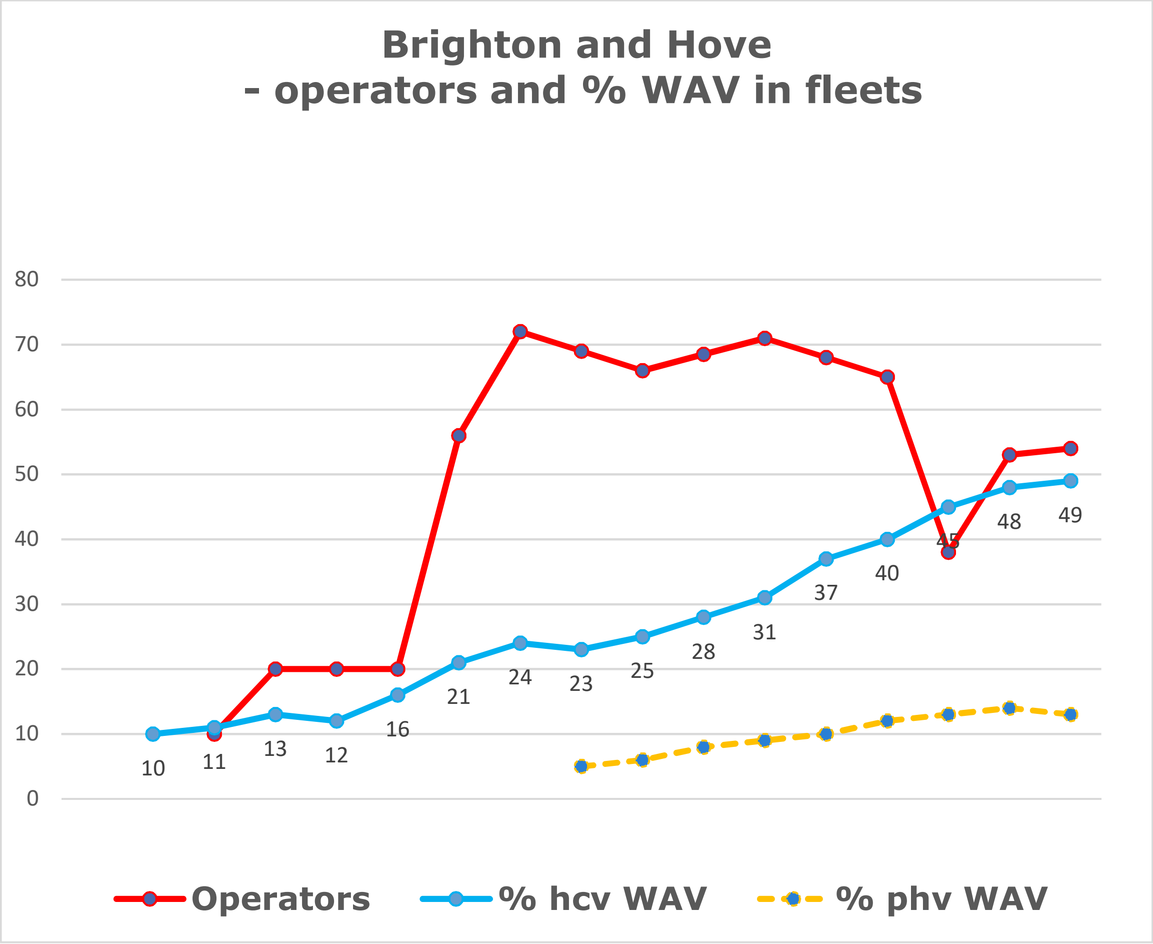


Licensing Statistics from 1994 to date

Information is also available from these sources to show how the level of wheel chair accessible vehicles (WAV) has varied. It must be noted that in most cases the values for the private hire side tend to be much more approximate than those on the hackney carriage side, as there is no option to mandate for private hire being wheel chair accessible.

In some areas, to strengthen the ability of the public to differentiate between the two parts of the licensed vehicle trade, licensing authorities might not allow any WAV in the private hire fleet at all. Many authorities with fully wheel chair accessible vehicles in the hackney carriage fleet either do not have any such vehicles in the private hire fleet, or do not record them, even if they are allowed.

The graph below demonstrates the continued growth of WAV within the hackney carriage fleet, arising not only from the extra five plates having to be WAV but also from the continuing policy that replacement vehicles must also become WAV style. Interestingly, the level of WAV in the private hire fleet, having shown steady increase, reduced in the period after the latest survey, suggesting these vehicles might have transferred to the hackney carriage new plates. Operator numbers had reduced, but are now growing again yet remain less than the very high level seen between 2007 and the last survey.



Operator numbers and levels of WAV provision in the fleet

Brighton and Hove undertake regular review of its policy to limit hackney carriage vehicle numbers in line with the BPG. The previous surveys were in 2015, 2012, 2009, 2006 and 2003, one of the best and most rigorous reviews of policy across English licensing areas. This rigour is enhanced by the fact that all of these reports remain available so that evidence of why the limit was retained is at a maximum.

Current fleet structure

Whilst generally the overall structure of the local licensing industry is fairly straight forward, the actual number of specific restrictions on activity are kept to a reasonable minimum to allow flexibility of business models for those in the licensed vehicle trade. This, however, does lead to significantly complex overall structures within the Brighton and Hove City operation. This section has used the current driver, vehicle and operator statistics to seek to identify present structures, partly to understand the levels of sharing of vehicles.

Brighton and Hove has a mixed hackney carriage vehicle fleet, with both saloon and WAV style vehicles allowed. A wide range of WAV styles are allowed, including some rear loading vehicles. Further, there are no restrictions on the number of vehicles a person or company can own, and till recently a person could hold both a hackney carriage and a private hire driver licence (and at the present time some people still do, in fact a small number have an overlap between their new dual licence and their old pair of licences).

The key reason for including this analysis in this report is that drivers without their own vehicle can often be a high pressure point for wanting their own vehicle, which can put pressure on plates where there is a limit policy. This may not relate to classic unmet demand, but more a wish for a person to be able to avoid rental fees (but these are replaced by having to take on the full costs of vehicle ownership, which are not trivial).

The database used from July 2018 showed the following:

- 1,117 dual drivers
- 38 hackney only drivers
- 286 private hire drivers
- 575 hackney carriage vehicles with 516 owners
- 452 private hire vehicles with 424 owners
- Nine operators with three or more vehicles
- Between 67 and 75 operators with just one or two vehicles (with some duplication between names giving the variation)

As already mooted above, the current English licensed vehicle trade operates under a wide range of business models. Brighton and Hove City seeks to provide freedom to as many of these models as possible although other licensing areas may not be so tolerant, for various reasons. The range includes:

- Single owner/driver hackney carriage operations
- Single owner/driver private hire operations who also must have an operator licence
- Small companies who may or may not own vehicles
- Larger companies who may or may not own vehicles, or may have a mix, or may operate as a co-operative of owner/drivers

At the present time in Brighton and Hove City our evaluation of the database suggests:

- Nine people with hackney carriage vehicles and driver badges
- 353 people with hackney carriage vehicles and dual driver badges
- 172 people with private hire vehicles and private hire driver badges
- 137 people with private hire vehicles and dual driver badges
- 21 people with a private hire vehicle, a private hire drivers' badge and an operator licence
- 20 hackney carriage drivers without vehicles
- 63 private hire drivers without vehicles
- 578 dual drivers without vehicles
- A range of other mixtures of the above

There are on paper 59 hackney carriages and 28 private hire vehicles in multiple ownership (additional to allowing one vehicle each that they drive), and therefore clearly available for rent as no-one can physically drive two vehicles at the same time (although some people may own two vehicles to use at different times for different purposes). However, there are around 150 hackney carriages and 115 private hire owned by people who do not have their own driver licence. Further, any vehicle already owned and driven can also be made available for rent. This should imply more than enough choice for people wishing to rent a vehicle. Our figures suggest there are in the order of 660 drivers who do not own their own vehicle, although this may include some people who only drive occasionally, such as business owners who like to retain flexibility, or people who have left the trade but have not cancelled their licence.

Further discussion of these figures occurs in the synthesis section of the report.

3 Patent demand measurement (rank surveys)

As already recorded in Chapter 2, control of provision of on-street ranks in Brighton and Hove is in the control of the highway section of the City Council itself, which should maximise flexibility in change, although in actuality being part of a different part of the Council may still leave issues in getting new ranks, particularly as the highway section has the responsibility to oversee the full transport requirements of the City.

Appendix 2 provides a list of ranks in Brighton and Hove at the time of this current survey. Discussions were held with the licensing section and trade, internet checks were made and some site visits undertaken to identify the current active ranks, and to select a suitable sample for the review of unmet demand and its significance. Our methodology involves a current review both in advance of submitting our proposal to undertake this 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.

Further, for this study, an initial review was undertaken at the two busiest local authority ranks to test if there was any suggestion that levels of unmet demand might have become significant since the previous survey. This excluded the station rank which needs a separate permit as any unmet demand there cannot be easily influenced by the council adding new licences due to the additional restrictions and cost. The rationale was that the two busiest ranks would be the most likely places that unmet demand might be observed. The comparison also covered the two busiest 24-hour periods expected, i.e. from early Friday morning through to early Sunday morning.

This initial test, undertaken during March 2018, found expected weekly estimated flows which were 13% less at the busiest location, and 10% less at the second location tested. During the 96 hours covered over the two sites, just one hour had an average passenger delay in the hour over a minute, with just two passengers having waits of around six minutes for a vehicle to arrive. Overall, 1% of passengers experienced a wait, with overall average passenger delay at these two sites over the two days of just a second. Overall, this suggested any propensity towards unmet demand being significant in the area was very likely to have reduced, and also provided suggestion that hackney carriage demand overall would be reduced in this survey.

The full rank survey work was undertaken at a similar time to the previous survey, during May 2018. An agreed set of observations were undertaken, although to add comfort additional observations were undertaken at sites on a 'quick watch' basis with some of those hours having passenger data included into the evaluation to ensure the results were even more robust. The overall result reduced estimated weekly flows using the extra detail by around 3%, suggesting our factors being used to generate the full week were slightly more optimistic than in reality, a further robust assumption in our estimates.

The table below presents the 2018 results and compares them to available information from previous surveys.

Rank	Passengers per week, 2018 survey	% of total demand at location, 2018	Passengers per week, 2015 survey	% of total demand at location	Passengers per week 2012 survey
Station (private)	14,872	37	21,915	40	15,115 (41)
East Street	10,722	27	14,696	27	6,043 (16)
St Peter's Place	3,760	9	4,093	7.5	1,957 (5)
Queen Square	2,644	7	2,595	5	2,777 (7)
Hove Station	2,143	5	1,717	3	2,093 (6)
West Street	1,800	5	2,710	5	3,370 (9)
Norton Road	1,321	3	1,460	2.5	1,202 (3)
Church Street (informal)	1,085	3	2,626	5	n/a
Paston Place	438	1.1	1,402	2.5	1,090 (3)
Brunswick Place	432	1.1	469	0.9	692 (2)
Old Ship	398	1	445	0.8	2,254 (6)
Church Road	330	0.8	450	0.8	451 (1)
Elm Grove	4	0.0	22	0.0	27 (0.0)
Goldstone Villas	n/a		n/a		145 (0.0)
Total	***39,949***		***54,600***		
Growth from 2015			***-27%***		
Comparison to previous surveys					
		From 2003	***From previous***		
2018		***+7%***	***-27%***		***39,949***
2015		***+46%***	***+47%***		***54,600***
2012		***-1%***	***-29%***		***37,216***
2009		***+40%***	***+13%***		***52,542***
2006			***+23%***		***46,308***
2003					***37,500***

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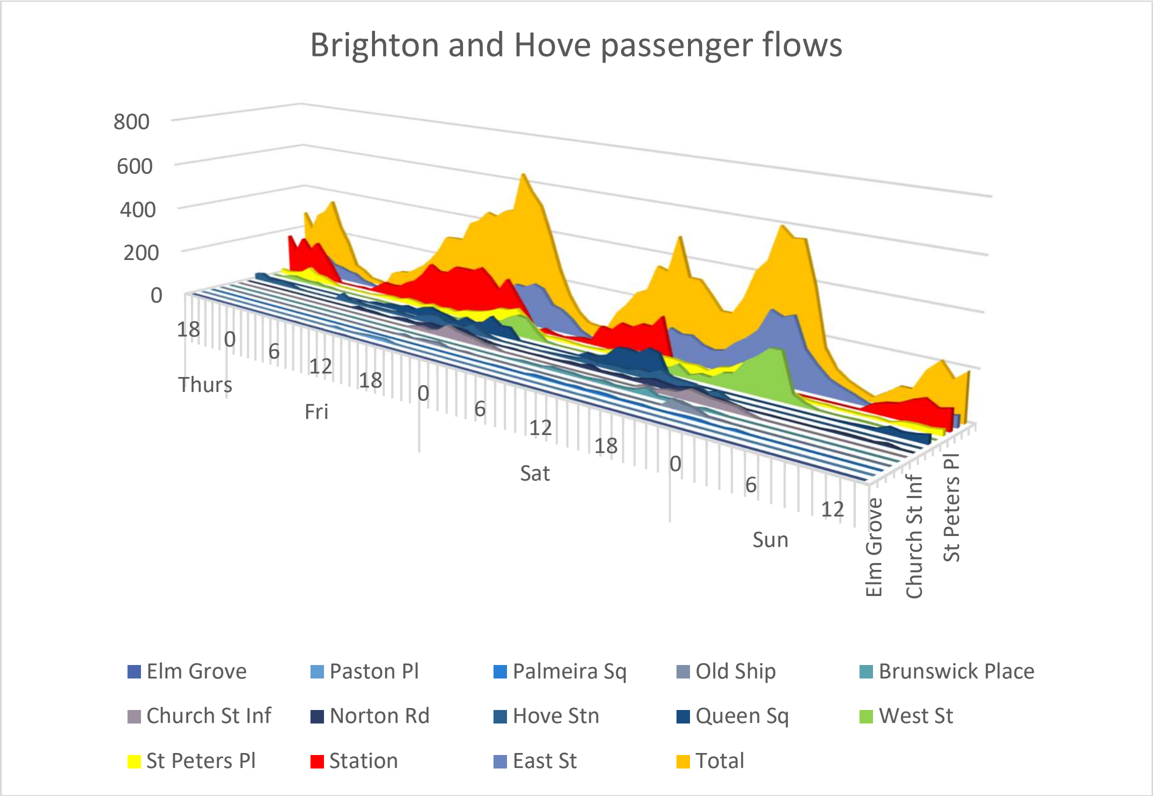
The key result from this table suggests a clear reduction in usage of hackney carriages at ranks of some 27% since the last survey in 2015. This takes observed usage levels to just 7% more than the level in 2003. However, this is not the first such reduction, with a similar effect occurring between 2009 and 2012.

In terms of share between different ranks, the station has slightly reduced its dominance, being the rank seeing the largest reduction in passengers of nearly a third. East Street has the same share, but the next three ranks have all seen proportional increases in their usage levels (with both Queens Square and Hove station ranks actually seeing an increase in passenger usage). Paston Place and the informal Church Street location both saw significant reductions in usage (the latter might relate to the impact of construction works in that location in 2018).

All the passenger rank usage information was drawn together to present the observed flows in the picture below:



It should be noted that this represents only hours actually observed and recorded, hence the gap in the Station data for Saturday. It further confirms that whilst there are a lot of active ranks in the Brighton and Hove licensing area, the main contribution to hackney carriage rank usage comes from the Station, East Street, St Peter's Place and West Street.

Whilst there is clearly higher levels of usage on Fridays and then more on Saturdays, even allowing for adding in the Station flows on the Saturday afternoon, the Saturday level is not significantly higher than Friday. Even weekday flows are not as low as in many other places.

Review of the hour by hour total flows across the authority area found no period when there was not use of a hackney carriage from a rank at one point or another. The picture also clearly shows that most of the smaller-used locations are providing more than a nominal contribution, demonstrating hackney carriages to be available across the area and over time wherever demand exists.

From the general watching of other information not actually included in full detail (e.g. the other hours at the Station and other days at the smaller ranks), most active ranks tend to have one or two vehicles there nearly covering all hours. In the cases where demand is very low, vehicles may not actually wait but we clearly observed any vehicle that was out and about regularly checking ranks in case any passenger was waiting. For some locations more on the main traffic routes, such as Palmeira Square, the focus was much more on passing vehicles ensuring the rank was covered, with many examples of passengers hailing a moving vehicle from such locations.

We also identified that the Station rank, requiring an extra permit, does have a period when it is physically closed, from 01:30 to 03:30 each and every day. This includes very clear barring of access, at which point cleaning is undertaken by the Station staff.

Overall passenger service

The overall delay information was also reviewed. Of the 548 hours included in the passenger usage rank information, just 11 (2%) saw hours with average passenger delay of a minute or more. This covered 365 passengers, 2% of the overall total travelling in those hours. A further 36 hours making in total just under 9% of observed hours saw average passenger delay that was not zero. This saw a further 12% of travelling passengers. Just 20 passengers, in five different hours, experienced a wait of 11 minutes or more for a hackney carriage to arrive at a rank. Given the overall high volumes travelling, this is a very good service, and far from any potential for unmet demand to be significant (further information regarding this is provided in the specific chapter about unmet demand below.)

Vehicle activity

A test was undertaken on the Saturday to identify the level of hackney carriage vehicle activity which equated to the service levels provided. During the course of our sample observations, some 444 separate different vehicle movements were identified. Of these, 17% were not hackney carriages. Of these, 75% were actually local Brighton and Hove private hire vehicles. The remaining identifiable vehicles were split between various out of town authorities, although it was not always possible to discriminate from where.

Some 367 different Brighton and Hove hackney carriage movements were recorded in our sample. These accounted for some 43% of the current valid hackney carriage plates on issue at the present time. This suggests that the service provided on the Saturday afternoon and evening was covered by less than half the fleet. Even allowing for our observations being a sample, this still implies there is spare capacity available in the fleet to meet higher demand.

Disability Usage

For all rank hours for which detailed observations were undertaken, a record was made if the vehicle appeared to be a saloon or a wheel chair accessible style. 59% of all vehicles recorded as local hackney carriages appeared to be WAV style – a higher proportion than the 48% in the fleet at the time of the survey. This suggests the WAV style fleet tends to be more active at ranks than the saloon style fleet.

During our survey, six people accessed hackney carriages at ranks in wheel chairs. This is a moderate level of usage – about the same as seen in 2012 and 2015 surveys. These 2018 examples were at five different rank locations, including one of the lesser used ranks. A further 16 people were observed to have some sort of disability, but not a wheel chair. These people were observed at seven different rank locations. This suggests a good spread of actual usage of hackney carriages by those needing either WAV or assistance into vehicles.

Rank usage by other vehicles

A review was also undertaken of other vehicle types observed at or near the ranks which were watched in detail. During our survey, some 28,665 different vehicle movements were logged. Of this total, 96% were actually hackney carriage vehicles, suggesting a generally high level of compliance with ranks by other vehicles. Cars abused ranks about 2% of the time, with some small levels of abuse by goods vehicles, emergency services and local private hire, but not too much overall. The highest proportion, the remaining 2% was in fact vehicles identified as ‘out of town’ licensed vehicles at or near the ranks. Whilst relatively small, this number is clearly recording the known issue regarding such vehicles.

Interestingly, the worst location for these out of town vehicles appeared to the the private station rank. This was followed by West Street, East Street, the Old Ship hotel location and the informal Church Street location.

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 (eg of students, or a sub-centre), although conclusions from these separate samples can only be indicative taken alone.

It is normal practice to compare the resulting gender and age structure to the latest available local and national census proportions to identify if the sample has become biased in any way.

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

Finally, some recent surveys have placed an electronic copy of the questionnaire on their web site to allow interested persons to respond, although again there needs to be an element of care with such results as people choosing to take part may have a vested interest.

For this survey, 350 interviews were obtained with 150 in the Brighton shopping area, 150 in the Hove shopping area, and 50 in London Road near to Brighton station. The sample said 49% had access to a car (very similar to 2015), with 72% saying the lived in the area. The sample exactly matched the expected gender profile to the 2018 census information, but interviewed a slightly larger proportion of the lowest age group (33% compared to 30% in the census), with a lot more of the central age interviewed (56% compared to 42% in the census), and a lot less, 11% compared to the census 27%, for the older group. Interestingly, this was a similar profile to 2015 in comparison terms.

A very low 16% told us they had used a licensed vehicle in the last three months in the area, compared to 33% in 2015. The resulting level of trips per person per month was also low, at just 0.49 (compared to 1.5 in 2015), with an even lower value for the sample at London Road (just 0.15). The average reduced to 0.16 trips for hackney carriage specific, or 34% of the overall total, a much lower proportion than the 87% in 2015.

21% of people responding said they could not remember the last time they used a hackney carriage, but a very encouraging none said they could not remember seeing one – a result of the livery policy in the area. The value not remembering when they had used one was higher than the 5% of 2015.

For the small number responding, 32% got a licensed vehicle from a rank (similar to the level noted above identified as hackney carriage usage, and only marginally less than the 36% of 2015) and 40% telephoned a company. 19% said they used an 'app'. 6% said they hailed and 3% said they used a freephone.

In terms of companies phoned, the top company obtained 49% of mentions. The next two companies obtained 18% and 13%, one of which was an app based company. Eight other names were given but none obtained more than a single response.

22 separate names were given of rank locations that people were aware of. 27% said Brighton Station, 17% said Churchill Square, 9% George Street Hove and 7% North Street. Two other locations obtained 5% of mentions, East Street and Hove Station, the former getting a lot less mention than in 2015. Three others obtained 4% each and the remaining locations 2%.

Compared to other items, an encouraging 60% said they would use the ranks they had named.

There were very few responses when people were asked if they had any problems with the hackney carriage service in Brighton. There were more – but still not significant numbers – telling us the matters that might encourage them to use hackney carriages or use them more. As is usual, the top scoring matter was if the vehicles were cheaper. The next highest score was for more hackney carriages which could be phoned for. Availability of an 'app' was important to one person, as was rank location and having larger hackney carriages. All results for this question were lower again than in 2015, suggesting service levels have improved.

In terms of disability, 89% said neither they, nor anyone they knew, needed any form of adapted licensed vehicle. This was a reduction from the 96% of 2015. Of those responding of need for an adapted vehicle, twice as many needed a WAV compared to those needing a different adaptation.

The latent demand factor based on people giving up waiting at ranks was 8.6%, much increased from the low level of 1.5% in 2015. The similar value for hailing was 8.3%, giving a relatively high combined latent demand value of 16.9%.

73% of people said they would always choose the first vehicle available when arriving at a rank. 10% would choose a wheel chair accessible style with the remainder choosing a saloon. Most of those choosing the saloon said they would do so to leave the WAV style available for those that required that sort of vehicle.

77% said their last hackney carriage journey was in a saloon, with 13% saying they travelled in a WAV and 10% not being sure of the vehicle style.

70% felt there were enough WAV in the Brighton and Hove area, with 90% considering there were enough hackney carriages overall.

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 one stakeholder but we have tried 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.

Supermarkets

All the responding supermarkets told us their customers did use licensed vehicles. Two confirmed they had direct phones to taxi companies. Three had direct phones but also said customers often made their own arrangements to obtain a vehicle when necessary. Two said people would usually make their own arrangements, but that staff would contact if customers asked them to do so.

Two were aware of nearby ranks that their customers might use. None had received any complaints or negative comments about the service their customers obtained. One took time to say that vehicles arrived very promptly, with no distinction between company performance in that respect.

Hotels

Every hotel that responded to our request for information about customer licensed vehicle usage said their customers made use of them. All said that either reception would get a vehicle if customers asked, or customers made their own arrangements. Two were aware of ranks which customers might use. Two had not received any complaints about the service provided whilst two others took time to say the service provided was good.

Public houses

Every public house told us their customers made use of licensed vehicles. One said staff would arrange vehicles, whilst five said customers usually made their own arrangements, but that staff would help if asked. One said there was a rank directly outside, with two others also well aware of ranks nearby. Two had not received any complaints, three said the service provided was very good but one suggested local knowledge needed to be improved on behalf of drivers.

Night clubs

As is usual for this type of survey, obtaining comment from night clubs proved difficult. However, the club which responded told us their customers did use licensed vehicles, making use of a rank directly outside the club. Their main concern was a need for consistency in the prices charged to their customers, and some reticence of the trade to take customers longer distances.

Other entertainment venues

One entertainment venue said their customers used local licensed vehicles, but said customers usually made their own arrangements. This was partly since they had an issue with a preferred company supplier who had failed to provide vehicles in a timely manner. However, the site was also aware of a nearby rank. Two other venues said they did not think their customers specifically used licensed vehicles to leave their sites.

Restaurants

Every restaurant that responded confirmed their customers did use local licensed vehicles. They all said that staff would get a vehicle for any customer that asked. One was aware of a nearby rank. One said the service was very reliable. However, one said that they had reports of drivers being rude and unfriendly to their customers.

Hospitals

One hospital confirmed its patients and staff did make use of licensed vehicle services. They said that people usually made their own arrangements, or sometimes made use of direct phones that were provided at their sites. They were aware of the nearby rank – and took time to confirm that they believed patients and staff got a very good service.

Police

No police concerns were raised.

Disability

One group met with us and shared their concerns although they also regularly made their points to the regular forum meetings. Issues were:

- Long booking times for people needing larger vehicles to fit them
- Refusals arising from drivers saying they are not adequately trained
- Confusion about the complaints procedure
- Regular missed appointments arising from lack of vehicle availability
- Difficulty in getting vehicles when school contracts are being serviced
- Concern about phone refusals when customers mention needing to travel with assistance dogs
- They were no longer seeking a fully WAV fleet

Another group spoke to us by phone due to poor weather conditions on the consultation day. They were pleased how proactive Brighton was in regard to disability issues that arose. They felt there were enough vehicles, and reiterated that when issues arose, they were dealt with quickly and effectively. This meant there had been no recent specific complaints.

Rail and other transport operators

National rail statistics are available that summarise total entries and exits from each station in the national rail network. The busiest station is identified as 1st, with each successive station seeing less patronage. In the latest data available, which considers the year ending in March 2017, Brighton has moved down the table to be the 28th busiest station in the national network. Other stations within the Brighton and Hove area are further down the list (Hove is 286th, Falmer 477th, Portslade 577th, Preston Park 855th, London Road Brighton 1029th, Moulsecoomb 1,109th and Aldrington 5,279th with around 185,000 departures and arrivals).

Rail year (ends March in last year noted)	Entries / exits	Growth / decline
Brighton (28th)		
1997 / 1998	7,376,192	n/a
1998 / 1999	8,309,344	+13%
1999 / 2000	8,930,344	+7%
2000 / 2001	9,282,656	+4%
2001 / 2002	10,153,601	+9%
2002 / 2003	10,368,208	+2%
2003 / 2004	Not collected	
2004 / 2005	11,295,080	+9%
2005 / 2006	11,854,512	+5%
2006 / 2007	12,853,442	+8%
2007 / 2008	13,474,555	+5%
2008 / 2009	13,806,628	+2%
2009 / 2010	13,741,582	-0.5%
2010 / 2011	14,493,010	+5%
2011 / 2012	16,052,520	+11%
2012 / 2013	16,187,024	+1%
2013 / 2014	16,940,764	+5%
2014 / 2015	17,170,740	+1%
2015 / 2016	17,333,326	+1%
2016 / 2017	15,993,072	-8%
Last three years (13/14 to 16/17)		-6%

The table shows that the last three years showed slight growth in the first two years, but strong decline in the most recent year available. This may have been due to the impact of long term strike action, and it is unlikely that figures covering the next two years will show any improvement, since the impact of the very poor timetable change of May 2018 will be evident even into the data that summarises the information which will not be available until about another year from now.

Brighton Transport Policy

A representative from the Transport Policy section of the Council met with us. They confirmed the trade are regularly kept in touch both using the Forum and via trade representatives and the Unions. They felt the trade worked together with them very well on new proposals, such as the Valley Gardens rank revisions that were upcoming. They felt the transport partnership had been very effective in overcoming previous blanket opposition to new ideas. The Council continues to aim to keep the number of ranks spaces at the current level. They get strong support for the licensed vehicle trade from Labour politicians. A key change in the near future relates to the need to reduce Nox.

A key future development expected is fresh thinking about how to provide better licensed vehicle access to the railway station. This could involve movement of the present rank to a location that was easier to get to rather than the current location which is poor in terms of congestion around its entrance.

6 Trade stakeholder views

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

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

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. A letter was issued to all drivers, with the option to return by post or complete on-line. A total of 149 responses were received, in the order of a 10% response, very good for this kind of survey. This was also 50% more than the response in 2015, encouraging.

81% of respondents said they drove hackney carriages and 19% said private hire (a higher proportion of hackney carriage response than in 2015). Overall, the average length of service was 19.5 years, although for the hackney element this was marginally higher at 21 years, with a maximum length of service quoted of 49 years.

39% of respondents said they worked six days in the previous week, 34% said five days, 10% four, 8% seven, 6% three and 2% one day. One person, or 1% of the response said they had not worked the previous week. The average actually worked out at just over five days.

The average hours quoted for working the previous week were just over 43 for hackney carriage and 41 for the private hire respondents. This is similar to 2015. The maximum hours worked, interestingly for a private hire driver, was 74 hours.

27% said they worked when they preferred to. 22% worked around family commitments (both increased from 2015). 17% serviced busy times but 14% avoided heavy traffic. 11% said their working hours were determined by their sharing a vehicle (the same as in 2015). Various other reasons were given but none amounted to more than 2% of the responses.

74% said they owned and drove their own vehicle. 52% said someone else drove the vehicle they used. Both these values are slightly higher than in 2015. 41% said the vehicle was also used by others in the daytime, 22% at night, 11% in evenings, and 8% simply when they were not using it. Various other choices were also given, none of which accounted for more than 4% each.

Two thirds said they accepted pre-bookings, with 45% of these via an office radio, and 34% through one named company. 5% said phone, with ten other methods stated, none of which received more than 3% of responses.

48 locations were quoted for use of ranks. Many were colloquial or slightly different names. 3% of responses said they serviced 'all' ranks. The top rank mentioned was East Street, with 21% of responses, followed by Brighton Station with 15%, St Peter's Church with 8% and Hove Station also with 8%. The Hospital and West Street both obtained 5% of responses. Queen's Square / Clock Tower obtained 5%. The other locations received between 4% and just a single mention. Overall, this suggests a good service to a wide range of ranks, with no obvious omissions although there were also quite a few strange responses which were hard to interpret. Compared to 2015 the top three were the same but West Street and Queen's Square had both reduced in proportion.

For the hackney carriage trade respondents, just 2% said they got all their fares from ranks. The highest proportion, 40% said they got between 26 and 50% of work from ranks. 71% said they obtained between 1 and 25% of work from hailing, with 25% saying between 26 and 50% from phone bookings. Very few obtained school bookings or other work.

71% of private hire got all their work from phone bookings. It was not clear exactly where the other work came from for the other 29% of private hire, although there was a single mention of work from hailing and another of work from ranks.

53% felt the current policy of managed growth remained the correct policy. About 23% of drivers said if this changed, they would react by working longer hours to keep income the same. 45% of those responding said they would leave the trade. This level of support is much lower than in 2015 when 90% agreed.

With respect to levels of support for the current policy, interestingly, the highest level of support was from private hire, where 62% supported the current policy. On the hackney carriage side, 53% of those that are owner-drivers supported the policy, but a slightly lower 47% of those who are drivers only supported. This identifies the group of people who rent a vehicle on the hackney carriage side who would prefer to have their own plate – about 20 of those responding.

When asked to give reasons that the limit benefitted the public, 30% said it helps keep congestion and pollution under control, 29% said it helps maintain a safe and efficient service and 20% said it ensured supply and demand were kept in balance. 9% said it helped maintain vehicle standards, 7% that it reduced over-ranking, and 5% that it maintained driver standards.

88% felt there were enough hackney carriages licensed where they worked.

Other discussions were held on the key stakeholder day with representatives from the trade. Two different groups, one representing principally companies and the other principally the trades unions, met us.

Both made similar points, with the most important concern being the high level of out of town vehicles many of which formed ranks near to main ranks, some of which was in order to ensure bookings from 'apps'. There was an estimate of some 200-300 vehicles at weekends which were from a range of other areas, although at the time we met the impact of one company's 'geographic lock' had not yet been seen as it was not long in place. There were concerns about a lack of adequate rank spaces, particularly at the station. The station permit restricts service there to about 320 vehicles, whilst there are presently about 250 purely independent hackney carriages and about 340 with the largest company. There was also concern that some out of town vehicles are very hard to distinguish from normal saloon vehicles. Also, it was felt that a lot of disabled customers were now tending to choose saloon style vehicles if they did not specifically need a WAV style.

7 Evaluation of unmet demand and its significance

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

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

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

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

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

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

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

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

If both of these components are non-zero, then the remaining components of the index come into play. These are the peakiness factor, the seasonality factor, average passenger delay, and the latent demand factor.

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

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

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

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.

Element	2018	2015	2012	2009	2006	2003
Average wait (mins)	0.07	0.05	0.18	0.72	0.73	1.11
Peak factor	1	1	0.5	0.5	0.5	0.5
% Queues in weekday daytime hours	3.17	14.9	2	7	6	5
% pass in hours with waiting one minute or more	0.80	0.88	1.44	5.67	23	35
Latent demand	1.169	1.074	1.224	n/a	n/a	n/a
Overall index	0.20	0.71	0.32	16	50	97

The table above demonstrates that levels of unmet demand have reduced since 2015, with the levels lower than any previous survey. The total value has also remained resolutely beneath 1 over the last three surveys, covering some nine years. This suggests a very stable level of service provision by hackney carriages at ranks.

Compared to 2015, average passenger delay has marginally increased, with quite a large increase in latent demand. However, this has been more than balanced by a very high reduction in the off peak component of the index and a small but significant reduction in the level of passengers travelling in hours when there is waiting of a minute or more.

Given there is clearly no evidence of any unmet demand which at this time can be deemed to be anywhere near significant, there is no value in undertaking other tests such as by removal of the private or informal ranks from the information used as this is very unlikely to change the overall conclusion from the ISUD estimate. Further discussion of this result in context follows below.

8 Disability Considerations

Recent surveys for Brighton and Hove have always included additional research to test if there needs to be a further manged increase in the number of WAV style vehicles in the fleet. Since the survey, the next tranche of five WAV plates have been issued. This takes the current level of hackney carriages to 575, with the proportion now at 49% of the hackney carriage fleet. In addition about 13% of the private hire vehicle fleet are wheel chair accessible by choice, although we understand there has been a recent significant addition to this element since the statistics were provided for this Report. Both proportions are much higher than in 2012 when hcv WAV were 31% and phv WAV 8% (which suggests new WAV come from the saloon side of the phv fleet not the WAV side). The increase has continued since 2015 when the hcv WAV fleet was 40.5% and the phv element 12%. Apart from the more recent phv increase, this suggested the increase on the phv side had slowed in more recent years.

Brighton has seen an impressive rise in the level of WAV style vehicles in the hackney carriage (and private hire) fleets. In 1997, just 10% of the hackney carriage fleet was WAV. By 2011, this had risen to 25%. It is currently 49%. This is an almost 3% per year increase, mainly achieved by the requirement that all vehicles being replaced must now be WAV style. However, apart from the very recent counter change, the last three years has not seen very much increase on the private hire side, which may be an impact of the high level of change in the hackney carriage fleet, with potentially some owners transferring from hackney carriage to private hire to avoid the need to switch to a WAV.

As in 2015, 40 test phone-calls were made to phone numbers in Brighton which those with disabilities might call if they needed an adapted vehicle. This includes both hackney carriage radio circuits and large private hire companies as in 2015. Whilst we confirm that this test is clearly more ‘private hire’ focussed being by phone, it is also useful to compare how things have changed over time and one way by which peoples’ options to travel can be reviewed. There is an important rider on the 2018 data however, in that since 2015 more ‘app-based’ options have appeared which together with reduced numbers of private hire companies readily available to the public has changed the options for those wishing to make bookings for WAV specialist vehicles.

In the discussion below, we have used the same terminology as in 2015 for the sake of comparison. Whilst this may not be the most preferable way of explaining or terming the test, the focus needs to be on the results and not simply any implications from specific wording.

In 2012, the minimum and maximum quoted wait time for both standard and accessible vehicles was five to 60 minutes. In 2015, whilst the minimum of five minutes remained the same, the maximum reduced to 20 minutes for standard and 30 minutes for accessible vehicles. In 2018, the minimum quoted wait for non WAV was reduced to just two minutes, but the maximum quoted has again increased for both standard and WAV vehicles to 30 minutes, standard, and 45 minutes WAV.

The average wait time was 15 minutes (standard) and 32 minutes (accessible) in 2012. This measure saw improvement for both groups in 2015, with more significant reduction to 19 minutes for accessible (40% decrease) and 12 minutes for standard (20% decrease). However, the 2018 information found that the average for standard had returned to the 2012 level of 15 minutes whilst the accessible average has also increased to 24 minutes, but not back to the levels of 2012. This is counter intuitive given the large increase in available vehicle numbers for accessible customers.

When considering the differences between the four time periods, although overall wait times are longer at night for phoned bookings, the disparity between accessible and standard in proportionate terms is actually lowest at that time. The most disproportionate wait was in fact for those wanting an accessible vehicle during the morning period, when accessible quoted times tended to be three times those of standard vehicles.

The longer 'post 22:00' wait times quoted might suggest that overall there are a lot of hackney carriages who work for private hire circuits who choose to work from hailing or ranks during this period rather than remaining with the radio networks.

The calculation for extra vehicles needed in 2012 suggested the discrepancy was an additional 230 WAV. Undertaking the same calculation in 2015 suggested an extra 139. The 2018 calculation suggests 190 are needed which again seems counter-intuitive given there has been a 22% increase since the last survey in the number of available WAV style vehicles.

Were these additional vehicles all added to the hcv fleet immediately to attain parity of service, this would mean that fleet would be 82% WAV style. However, our observations above suggest that this would not appear to be a sensible option, and that it may in fact not achieve the desired aims.

Further discussion of this in context of other responses and information collected occurs in the following Chapter.

9 Summary, synthesis and study conclusions

This Survey of demand for hackney carriage services 2018 on behalf of Brighton and Hove has been undertaken following the guidance of the BPG and other recent case history regarding unmet demand and its significance. It is the latest in a regular series of reviews of unmet demand, its level and significance and other related issues.

Background and context

This current survey of the level of demand for hackney carriages in the Brighton and Hove City Council area has been undertaken between February and October 2018. The scope of the study has been extended from that undertaken in 2015 to further increase the level of robusticity of the information provided to Councillors, and also to cover the specific issue regarding issue of five plates per year as well as the aim of continuing to increase the level of WAV style plates in the fleet further.

The study is held in the context that overall background transport policy strongly supports development of the licensed vehicle fleet as an important part of the transport offer of the area. Ranks remain seen as key vehicle / people interchanges that enhance neighbourhoods and destinations. Further, the hackney carriage element of the licensed vehicle trade has seen managed growth of some 25% since 1997, a very similar level to the 29% of growth observed in the, in theory, market-led private hire element. A key change in statistics from the last survey is the widespread take-up of driver licences that allow people to drive either hackney carriage or private hire, which has reduced, but not yet eliminated, the duplication of licences held by a single individual in some cases.

The level of WAV in the hackney carriage side has continued to increase, mainly through the policy of new vehicles now having to be WAV style, with the level at last review being some 49%. The parallel growth of vehicles in the private hire side in WAV levels has faltered slightly in the statistics, but we understand this may now have been reversed with a recent investment in such vehicles by one private hire company.

A very important point for this study is that Brighton and Hove remains one of the most regular survey repeaters, with copies of previous surveys every three years back to 2009 remaining available, providing an excellent best practice review of the limit policy and its impacts. This places the area in an excellent place for Councillors to have full information regarding their decisions about the limit policy and related matters.

This study also added a review of the detailed make-up of the overall industry structure in terms of how it actually works. The industry structure presently allows a wide range of operating models demonstrating plenty of active competition and relatively low levels of restraint in terms of allowing people to make the industry work for them. For example, there are single owner/driver operations both on the hackney carriage and private hire side. There are a range of company sizes, with and without vehicles, some on the hackney carriage side (without need for operator licences) and others working under operator licences, both with allied hackney carriages and without. There are also plenty of vehicles on both sides available for those not wishing to own a vehicle to rent. This occurs on both private hire and hackney carriage sides of the trade even though anyone can add a private hire vehicle as long as it meets Council standards. At the time of writing this report, new hackney carriage vehicles can be added to the fleet, but with a limit of five vehicles per year.

Rank observations

For this survey, an initial test was undertaken at the top two council ranks to see if there was any evidence that unmet demand levels might have tended towards becoming significant since the last survey. They also provided a test of demand early in the calendar year. These surveys suggested demand was 10-13% lower in the March of 2018 than had been found at these sites in the May 2015 surveys. It also clearly found that there was no evidence that levels of unmet demand had increased at all.

The full surveys were undertaken in May 2018 using a similar sample to that in 2015, but with added comfort provided by several sites being watched on an extended basis albeit in a less detailed manner (i.e. principally by observing when the rank was active, and simply recording passenger numbers rather than full detail for these additional hours).

Overall results found a reduction of observation of passengers at ranks in the area since 2015 amounting to some 27%. However, it also must be noted that this is not the first ever similar reduction level noted between surveys.

The largest reduction in usage arose at the private rail station rank. East Street remained the second busiest rank, albeit at a lower level of usage. Queens Square and Hove Station however both saw increased levels of actual passenger usage. Two ranks, Paston Place and the informal Church Street location, saw significant reductions.

Brighton and Hove remains a location where there is always some hackney carriage activity at ranks through the week. Our present survey found highest flows on Saturday, with marginally lower levels on Friday, and lower, but still significant levels of usage on Thursdays. Further, additional cover is provided in many locations from vehicles passing by, although any rank just off any main through route always sees regular vehicle pass-throughs even at the quietest times, suggesting the area is well-served by hackney carriages making themselves available for hire. This is a key, important and best practice factor of the local hackney carriage trade.

In terms of service to passengers, just 2% of observed hours saw average passenger delays in that hour of a minute or more, a very good level of service to the public. There were just 20 passengers in just five different hours seeing an actual wait for a hackney carriage at a rank of 11 minutes or more.

During the busiest survey day, 43% of the fleet was observed meeting the demand surveyed. This leaves plenty of spare capacity available to meet increasing demand levels.

The overall surveyed level of abuse of ranks by other vehicles in the area was very low. The largest group abusing rank locations, but only for 2% of observations, was out of town taxi style vehicles. This was at a similar level to private car abuse of ranks. The station was the worst location for this – a value that will be increased given there are other near-station locations known to be pick-up points a short distance from the ranks.

The Saturday plate observations provided another evaluation of active licensed vehicles in the area. At these key sites observed, 17% of such vehicles were other than Brighton and Hove hackney carriages. However 75% of the ‘other’ vehicles were identified as local private hire. This gives an estimate of out of town vehicles as about 4% of the overall mix at these key locations.

On street public views

The generally census-consistent sample of people interviewed in the streets across the area suggested a much lower overall usage of licensed vehicles now than three years ago, reducing from 33% in 2015 to 16% now. Overall licensed vehicle trips per month were estimated at just 0.49 per person per month, with the level just 0.16 for hackney carriages, showing just one in three trips were now made by hackney carriage, compared to nearly nine out of ten in 2015. Even though this might result from a different set of people responding now, this shows a decline in overall licensed vehicle usage with an even greater decline for the hackney carriage element.

The hackney carriage fleet remains very visible, although the level of those not remembering when they had last used a hackney carriage had increased from 5% to 21% this time. However, a very similar proportion claimed they principally got licensed vehicles from ranks, with the key growth area being 19% who said they now used an 'app'. An app-based company obtained some 13% of mentions when people were asked what companies they contacted. This was the third highest level of mention, with one company taking 49% and the second 18%, with few other companies of significance in the area. The top two companies were operators of mixed hackney carriage and private hire fleets.

Whilst 60% of respondents named ranks they said they used, the overall knowledge of ranks appeared to be reduced. 27% named the Station rank, 17% Churchill Square, 9% George St Hove and 7% North Street. Despite the observed growth in usage of Hove station rank, less people now said they knew about it or used it.

The level of satisfaction with the hackney carriage service was very high and suggested overall service improvement since 2015 – although this of course would occur with lower demand serviced by the same number of vehicles.

Latent demand had increased from 1.5 to 8.6% at ranks, with the newly added measure for hailing of 8.3% giving a relatively high latent demand factor of some 16.9%. Whilst at first seeming inconsistent with other information, this may result from higher expectations arising given the actual better service provided – people are less willing to wait as long.

70% felt there were enough WAV hackney carriages and 90% felt there were enough hackney carriages overall.

Key stakeholder views

Key stakeholders provided a positive view about the service provided by licensed vehicles, with most saying their customers did use them. There was some knowledge of ranks and their usage, although as is usual much of the key stakeholder usage was using private hire, or booked, vehicles.

Those within the council transport policy section remained very pleased with the provision of licensed vehicles services and their positive impact on transport provision in the area.

The rail station national flows showed a 6% decline over the last available three year period, with other more recent events likely to see further decline in overall rail usage in the next two sets of published information.

Trade views

A very good, 10% level of response was obtained to the main all-driver survey. Further, the two main representing bodies for the trade also made positive and good contributions to this Report. This is an encouraging level of engagement across the industry.

The working week averaged at five days and 43 hours (hackney carriage) or 41 hours (private hire), very similar to that in 2015. Nearly three quarters of those responding were owner-drivers although half said someone else also used their vehicle. About two thirds accepted pre-bookings, mostly via a company.

In terms of how people obtained work, few were entirely dependent on rank bookings. 71% said they got up to a quarter of their work from hailing.

The present managed growth policy was supported by 53% of the total of all trade respondents. The highest proportional support was from private hire, a very unusual response. There was slightly less support for the policy from those that did not own their own vehicles compared to those that were owner drivers, but not a significantly lower level (53% compared to 47%).

The major present concern from within the trade was the level of work taken by those who were not from the Brighton and Hove area. Many were concerned about how the public perceived these vehicles, and the safety implications that they may consider them to be hackney carriage when they were not actually local hackney carriages, and therefore more directly accountable to the local council were issues to arise. There remained concerns about rank provision.

Formal evaluation of significance of unmet demand

The present ISUD index is now at the lowest level it has ever been in the currently listed set of surveys. The main negative change in the index has been the increase in latent demand.

Disability issues

Rank observations found 59% of observed movements at ranks were apparently WAV style, a much higher proportion than the 48% in the fleet at the time of the surveys. The level of observed usage of people in wheel chairs using hackney carriages at ranks was very similar to that in 2012 and 2015, being this time some six people. There was a much higher level of apparent disabled usage for those with non wheel-chair required disabilities.

In terms of being aware of others needing adapted vehicles, the level has increased from 2015, when 96% said they did not need a vehicle, this is now some 89% suggesting more people now need such style of vehicle. The level needing a WAV in this proportion saw about two thirds needing WAV style with the remainder needing other types of adaptation.

Disability stakeholders were generally pleased with the ongoing developments and service provided. However, there were detailed concerns mainly about those needing larger vehicles in order to travel.

The 'telephone' test found an increased level of WAV vehicles would be needed within the fleet to achieve parity in demand now, which seemed to be counter intuitive given the high level of increase of such vehicles since 2015.

Synthesis

The overall current picture for the traditional hackney carriage rank-based market appears to be a marked decline in usage. Part of this relates to issues at the station that have seen its actual number of passengers reduce over the last three years, although the hackney carriage reduction is worsened by the increased levels of competition from private hire, both within the area and from out of town at this point. This particular market has been further complicated by the additional, less easy to observe, spread of demand from the former main single point of pick-up to a wide range of alternative points that people go to around the station to make onward licensed vehicle trips. With the introduction of hackney carriage app-style options, not all of this demand has been lost to the hackney carriage per se.

The level of confidence that there is no unmet demand which is significant is higher than ever. The only issue that arises is that improved levels of service seem to have given people an even higher expectation of what they expect of the service, hence the increased level of latent demand. The large take-up of app-based methods of getting vehicles will also have increased expectation significantly, as these methods tend to minimise passenger wait times for vehicles.

This implies that the current policy of managed growth, adding five plates per year, could in fact be switched off at this time. However, in the past, this level of addition seems to have kept fleet numbers in line with both passenger growth but also ensured the balance between private hire and hackney carriages in the area was also maintained.

The full level of usage of hackney carriages includes elements not measured directly by this survey. These include hailing (6% stated by the public interviews), bookings through radio circuits using hackney carriage vehicles, any contracts met by hackney carriage and the most recent introduction of a purely hackney carriage 'app'. All of these are legitimate additional patronage for hackney carriages for which the only current evidence we have is from the driver survey, which suggests they are non-trivial. It is possible, but hard to know fully, that some of the loss of usage at ranks may have not actually been lost to the hackney carriage per se, but may just have transferred. We believe this is highly likely. On this basis, continuing the managed growth at its current level would seem sensible to ensure the hackney carriage trade remains able to provide demand where and when needed.

It would appear that the further value of adding more WAV to the hackney carriage fleet is now be limited. The public view possibly suggests that the maximum level might be at most 65%, whereas the current tests seem to suggest the further increases since 2015 have not continued the improvement seen in the previous period. On balance, we would consider that a level of 50% WAV hackney carriages would continue the present benefits and be a sensible target to keep to in the future.

On the contrary, compared to policies favouring growth in WAV levels, around the traffic world, much more emphasis is being given to attempting to reduce air quality concerns, with many locations seeking to encourage the licensed vehicle fleet to set a good example by moving towards lower or zero emission options. Many authorities have had mandatory level targets set and many are seeking to achieve this through changes to requirements for both hackney carriage and private hire.

It is also clear that the additional five plates per year managed growth have ensured that any tendency toward unmet demand that might be seen as significant have been kept clearly in control. It seems prudent that this policy should continue, at the same level, but that the focus on fleet change now move to these plates being allocated to low or zero emission vehicles. Given the small number, this might best be set as fully zero emission, wheelchair accessible vehicle styles.

However, such a small number would not achieve as large a change in emission impact as is needed, but given the fall in rank-based demand, there is no real justification for increasing the number of plates. Discussion and consultation should occur with the trade to identify the best way to encourage the fleet towards better emission capability. This might replace the present policy whereby all replacement hackney carriages have to be wheel chair accessible.

There is one concern that must be kept in mind – the current expected zero emission wheel chair accessible hackney carriage range focusses on the medium size range of vehicle whereas there is concern from the disability inputs about need for more larger vehicles, none of which are currently expected to be low emission for some while.

In terms of potential quick-wins on emissions, hybrid, particularly petrol hybrid style vehicles, are currently well-appreciated and trusted by drivers, and although they do not give the full benefit of ultra-low emission options, because they are accepted and trusted, and of relatively lower cost compared to ultra low emission options, could be taken up more promptly. There could be significant value in encouraging this within both hackney carriage and private hire fleets. This policy would have to be continually reviewed to keep up with industry developments, which we consider may move quite quickly in the coming years, but not necessarily over the next year or two.

10 Recommendations

On the basis of the evidence gathered in this Survey of demand for hackney carriages services for Brighton and Hove, 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 Brighton and Hove licensing area. The committee is therefore able to consider retaining its present limit on hackney carriage vehicle numbers and to be able to support this against any challenge if required.

The options open to the committee therefore include the following:

- Retain limit at current level, removing the managed growth
- Continue managed growth for WAV
- Revise managed growth to switch to focus on environmental matters rather than WAV
- Remove the limit altogether (with various possible options from with no further restriction to quality controls such as in favour of environmentally friendly vehicle options).

At the same time the related policy regarding all replacement vehicles having to become WAV also needs reconsideration.

Further thoughts are provided in the previous chapter giving reasons why particular options might be preferable at this time. Further discussion can occur at the presentation of this report if necessary.

Brighton and Hove

DfT states limit began in 1986

	hcv	phv	lv total	hcd	phd	dd	total d	Operators	% hcv WAV	% phv WAV
1994D	444			1034						
1997D	459	352	811	1155	280		1435		10	
1999D	459	328	787	1091	377		1468	10	11	
2001D	459	397	856	1074	476		1550	20	13	
2004D	479	429	908	1097	527		1624	20	12	
2005D	479	470	949	1121	479		1600	20	16	
2007D	513	444	957	1103	527		1630	56	21	
2009D	528	614	1142	794	563	356	1713	72	24	
2010N	528	466	994	*971*	*579*	_	*1549*	*69*	23	*5*
2011D	535	469	1004	1147	594		1741	66	25	6
2012N	540	444	984	*1173*	*586*	_	1759	*69*	28	*8*
2013D	545	432	977	1199	578		1777	71	31	9
2014N	550	449	999	*1198*	*586*	_	1783	*68*	37	*10*
2015D	555	452	1007	1196	593		1789	65	40	12
2017D	565	467	1032	94	565	1051	1710	38	45	13
2018CA	570	450	1020	37	285	1121	1443	53	48	14
2018CJ	575	455	1030	37	277	1118	1432	54	49	13

Notes: Brighton and Hove authorities merged to form the new unitary authority in 1996.
In 1994 the separate authorities had 277 and 167 hcv and 701 and 333 hcd separately

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Appendix 2 – List of ranks

See separate document

Appendix 3 – Hours observed at ranks

See separate document

Appendix 4 – Detailed rank observation results

See separate document

Appendix 5 – On Street interview results

See separate document

Appendix 6 List of Stakeholders consulted

Key consultee	Response
Supermarkets	
Sainsbury's, Lewes Road	Y
Morrison's, St James' Street	Y
Waitrose, Western Road	Y
Waitrose, Nevill Road, Hove	N
Asda, Brighton Marina	Y
hiSBE, York Place	Y
Aldi, London Road	R
Iceland, London Road	Y
Tesco, Western Road	Y
Tesco, Church Road	N
Hotels	
Adastral Hotel, Hove	N
Brunswick Square Hotel, Brighton	Y
Myhotel Brighton	Y
Preston Park Hotel	Y
Artist Residence, Brighton	N
Royal Pavillion Townhouse	N
Hotel Una	Y
Restaurants / Cafes	
Graze Restaurant, Hove	C
Terre a Terre, Brighton	Y
Alfresco, Brighton	Y
St Georges Restaurant, Brighton	C
Indian Summer, Brighton	N
The Urchin	N
Six, Brighton and Hove	Y
Entertainment	
Bohemia, Brighton	N
The Old Market Theatre	Y
The Marlborough Pub and Theatre	N
Komedia	N
Sea Life Brighton	Y
Duke of York Picture House	Y
Public Houses	
Charles Street Envy Bar and Club	Y
Revolution Bar	Y
The Ancient Mariner	Y
The Prestonville	Y
Revelator	Y
The Farm Tavern	Y

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Night Clubs	
The Funky Fish Club	R
The Haunt	C
Volks	N
Club Revenge	N
Coalition	Y
Concorde 2	N
On The Rocks	R
Other key stakeholder groups	
Age UK Brighton and Hove	N
Royal Sussex County Hospital	Y
Brighton General Hospital	N
Brighton and Sussex University Hospital	N
The Montefiore Hospital	Y
Blind Veterans	N
Possability People	F
Guide Dogs	Y
Impetus	N
Scope	N
Pavillions	N
Martlets	N
YMCA	N
Sussex Police	N
Southern Railway	N
Council key stakeholders	
Transport, Mark Prior	F
Trade Representatives	
Afghan Taxis Association	N
Arab Taxis Association	N
Brighton and Hove Radio Cabs	N
Brighton and Hove Streamline	F
Brighton and Hove Uber Drivers	N
Cab Express	N
Independent Drivers Association	F
Private Hire Association	N
Southern Taxis Ltd	F
Taxi Link	N
Uber Britannia Ltd	N
United Taxi Drivers' Association	N
GMB	F
Unite The Union	F
All Driver consultation (by letter)	See Report

Key:

F – face to face

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Y – Response provided
N – no response received
R – refused to respond
C – location closed down or not contactable