

East Herts District Hackney Carriage Unmet Demand Survey

January 2023

Executive Summary

This Hackney Carriage Unmet Demand Survey has been undertaken on behalf of East Herts District following the guidance of the April 2010 DfT Best Practice Guidance document, and all relevant case history in regard to hackney carriage unmet demand. This Executive Summary draws together key points from the main report.

Video cameras were used to record footage over a 72 hour period from 7:00 on Thursday 8th December to 7:00 on Sunday 11th December 2022. The video footage was processed to derive passenger and hackney carriage volumes at ranks. The data processed from footage included all passengers who had to wait for hackney carriages at ranks. The locations observed, included formal ranks and informal rank locations. The volume of hires over the three days of observation are presented below.

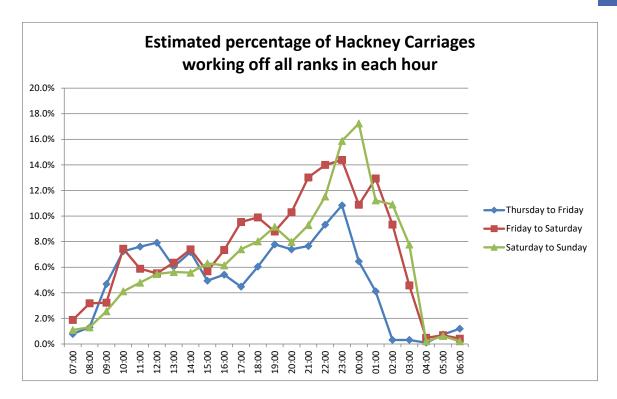
	Total hackney	Total hackney carriages	Total hackney		
	carriages	departing the	carriages	Total passengers	Average
	departing the	ranks with	departing the	departing the	passengers per
Rank location	ranks empty	passengers	ranks	ranks	hackney carriage
Total for all locations	477	2149	2626	3130	1.5
Ware High Street 1	8	7	15	14	2.0
Ware Station	113	186	299	249	1.3
Hertford North Station	49	152	201	212	1.4
Railway Street	133	315	448	434	1.4
Fore Street Hertford	18	591	609	1068	1.8
Riverside (Shopping Centre)	57	163	220	202	1.2
North Street Bishops Stortford	5	3	8	4	1.3
Bishop's Stortford Station	50	717	767	915	1.3
Riverside (Weatherspoons)	38	2	40	4	2.0
Anchor Street	5	10	15	21	2.1
Bull Plain Hertford	1	3	4	7	2.3

Many of the hackney carriages subscribe to a booking circuit, with a private hire operator. The majority of hires undertaken by hackney carriages were pre-booked hires or contract hires. Around a quarter of hackney carriage hires were from ranks.

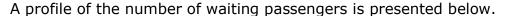
A further feature of the trade in East Herts is that the proportion of hackney carriages working from the ranks appears to be relatively low. The proportion of the fleet either waiting at ranks or having left a rank with a hire, commonly ranged from around 4% to around 17%. These low proportions corroborate evidence that around a quarter of hires were obtained from ranks and the remainder through other means.

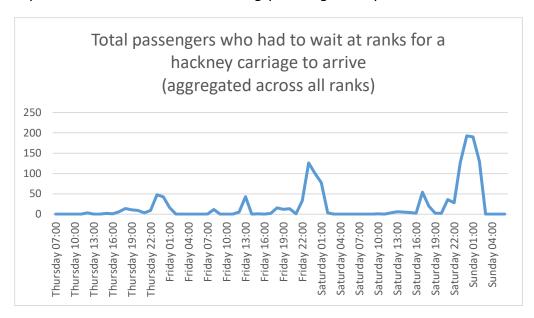
The proportion of the hackney carriage fleet which was observed working from the ranks each hour is presented in the following figure.





Passenger waiting occurred from time to time throughout the day on each day surveyed and at night.





The total number of waiting passengers was 1,412 passengers (45% of all passengers). The passenger waiting was largely concentrated on Bishop's Stortford Station rank and the Fore Street rank in Hertford.

The number of waiting passengers and the duration of waiting is taken into account when assessing whether the level of unmet demand is significant. A



calculation was undertaken, using rank activity data and evidence from public consultation, to determine the Index of Significance of Unmet Demand (ISUD). Where the index value is below 80, this is taken as a good indicator that the level of unmet demand is below the level which is deemed to be significant. The result of the ISUD calculation for East Herts was 498.1. Taking this value and other background factors into account, the findings of this study are the there **is unmet demand which is significant**.

The number of hackney carriages licensed by East Herts is significantly higher than that which would be needed to service the rank based demand, if hackney carriages only obtained hires from ranks. Consequently, many of the hackney carriages rely on a combination of both rank based and pre-booked hires, to generate sufficient income. Across the fleet around three quarters of hires are obtained through pre-booked hires or contract hires and around a quarter of hires are obtained at ranks.

Some of the private hire operators utilise private hire vehicles and hackney carriages licensed by other authorities, to service private hire bookings in East Herts. If competition from vehicles licensed by other authorities were to increase, this would tend to reduce the number of pre-booked hires undertaken by East Herts licensed vehicles, including those undertaken by hackney carriages, by diluting demand amongst more vehicles. This, in turn, could result in increased attendance at ranks, by those vehicles which currently obtain hires through booking circuits and consequently, increased competition at ranks. Such increased competition, could, in turn, lead to more independent drivers joining a booking circuit to boost earnings.

Nationally, there is a shortage of licensed vehicle drivers currently actively working as either private hire or hackney carriage drivers. This shortage appears to affect licensed vehicle operations in East Herts. Passenger capacity of licensed vehicles relates both to the number of vehicles licensed and the number of licensed vehicle drivers actively operating these vehicles. The shortage of drivers in East Herts has affected the level of available capacity.

As the survey has found that there is unmet demand which is significant, it would be prudent for the Council to consider measures which could be applied to address the shortage of hackney carriage provision at ranks.

We have identified three options to be considered along with a recommendation regarding which option is implemented.

Option 1 – wait for driver numbers and private hire operations to increase, to meet pre-booked hire demand and free hackney carriage capacity to meet demand at the taxi ranks.



Option 2 – increase the number of hackney carriage vehicle licences to enable more hackney carriages to meet demand at taxi ranks.

Option 3 – employ alternative measures to encourage the existing hackney carriage fleet to prioritise rank based demand over pre-booked hire demand, in order to reduce passenger waiting at the taxi ranks.

In order to justify option 1, a robust projection of future increases in driver numbers and private hire provision would be required to make this policy a defensible plan. No projections have been developed and it is unlikely that any such robust projection will be developed in the near future.

Potential measures to promote Option 3 are limited and would have limited 'enforceability'. Such measures would be limited to discussions to encourage hackney carriage operators to prioritise rank service rather than pre-booked hires, in the face of commercial pressures to do otherwise.

Option 2 would be a robust and defensible approach. However, it should be acknowledged that additional vehicles would require additional drivers to operate them. There are no reliable measures which may be implemented to ensure that licensing of additional hackney carriages will result in additional drivers operating them, in the short term. For example, some existing drivers of private hire vehicles or second (non owner) drivers of existing hackney carriages may apply for and operate an additional hackney carriage. Such changes would not effectively add capacity to the fleet, as the same drivers would merely switch to operating a different vehicles at the same times that they would otherwise be working.



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1 General introduction and background

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

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

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

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

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

The most recent reviews were by the Office of Fair Trading in 2003, through the production of the BPG in 2010, the Law Commission review which published its results in 2014, the Parliamentary Task and Finish Group which reported in September 2018, the Government Response in February 2019 and the consultation on "Protecting Users" which closed on 22 April 2019. None of these resulted in any material change to the legislation involved in licensing.

In November 2016, the Department of Transport (DfT) undertook a consultation regarding enacting Sections 167 and 165 of the Equality Act 2010. These allowed 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 but continued issues led to pressure for further change (some of which came in the second of two 2022 Acts). These two new 2022 Acts make small but significant changes. The 2022 Acts are the "Taxis and Private Hire Vehicles (Safeguarding and Road Safety Act) (31 March 2022)" and the "Taxis and Private Hire Vehicles (Disabled Persons) (28 June 2022)".

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

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



The Deregulation Act 2015 had two clauses relevant to taxi licensing – relating to length of period covered by licences (Section 10) and allowance of operators to transfer work across borders (Section 11) (both enacted October 2015).

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 licences.

The Law Commission conclusion (Law Commission, Taxi and Private Hire Services, Law Com No 347, May 2014, ref CM8864) 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 interval encouraged for review of unmet demand levels 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 further revisions to legislation. It should be noted that DfT did encourage authorities during the pandemic to delay unmet demand reviews beyond that three-year interval as they did not consider any review in the midst of the pandemic as being sufficiently typical to be of value.

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

The date for publication of the new DfT Best Practice Guidance remains 'imminent' but unknown, nor is the level of actual change that will occur fully known.

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 are now considering if similar changes might be made to encourage greater introduction of a more sustainable vehicle fleet, particularly in light of the suggestion in the Best Practice Guidance revision (Issued March 2022) consultation that alternatives to limiting numbers should be applied if they were felt to achieve the same aims. However, it is concerning that none of the alternatives include any requirement to prove that the policy chosen to replace any restriction on vehicle numbers as a quantity control has actually achieved its aims.

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

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

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

The DfT asked in writing in 2004 for all licensing authorities with quantity restrictions to review them, publish their justification by March 2005, and then



review at least every three years since then. In due course, this led to a summary of the government guidance which was last updated in England and Wales in 2010 (but more recently in Scotland).

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

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

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

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

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

The 2010 Best Practice Guidance stated "Most local licensing authorities do not impose quantity restrictions; the Department regards that as best practice. This is restated in the currently draft new Best Practice Guidance.

This new draft Best Practice Guidance also adds para 9.3 quoting "The Competition and Markets Authority was clear in its 2017 guidance "Regulation of taxis and private hire vehicles: understanding the impact of competition" that "Quantity restrictions are not necessary to ensure the safety of passengers, or to ensure that fares are reasonable."



To summarise, the Department for Transport Best Practice Guidance only references 'quantity restrictions' and that not imposing them is regarded by the Department as 'best practice'.

Conclusion to Chapter

In conclusion, the present legislation in England and Wales sees public farepaying 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 which 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.

In the minds of the travelling public the view of what a taxi is tends to be much more blurred than the formal definitions. The invention of the mobile phone and then the internet have not helped with definitions although this has been going on a long time but with many significant developments in the period of two or so years prior to the pandemic with the take-up of apps both for private hire and hackney carriage vehicle services.

The 'triple lock' licensing rule has also become accepted. A vehicle, driver and operator must all be licensed under the same licensing authority to provide full protection to the passenger and to comply with the legislative requirements.

It is also accepted that a customer can call any private hire company from any location they so choose to provide their transport. Many customers would not realise that if there was an issue it would be hard for a local authority to follow this up, unless the triple lock was in place by the vehicle used and was for the area the customer contacted licensing in. Attempts are being made to minimise this issue with growing liaison between licensing authorities.

Further, introduction of recent methods used by customers of obtaining vehicles for journeys, principally using 'apps' on mobile phones have also led to confusion as to how 'apps' usage sits with present legislation. This continues to be debated with the key issue being if obtaining a vehicle using an app (most of which rely on proximity to choose a vehicle) is a pre-booking or not, given the often minimal time between the person making known their need on the app and a vehicle meeting that need.



2 Local background and context

East Herts District has a current population of 151,786 based on mid 2020 population estimates.

All licensing authorities have full powers over licensing the vehicles, drivers and operators serving people within their area. At the time of writing this report, East Herts District has implemented a limit of 200 hackney carriage licences.



Licensing Statistics from 2013 to date

The provision of hackney carriages and private hire vehicles has varied over recent years. The following table and figures present the historic trends over recent years.



Table 1 - Historic profile of licensed vehicles and licensed drivers

	Wheelchair			Wheelchair	Other	Total	Total licensed	Total driver	Total accessible	Ratio of drivers
Year	accessible taxis	Other taxis	Total taxis	accessible PHVs	PHVs	PHVs	vehicles	licences issued	vehicles	to vehicles
2013	3	253	256	3	42	45	301	360	6	1.20
2015	2	255	257	0	54	54	311	341	2	1.10
2017	2	242	244	2	29	31	275	256	4	0.93
2018	2	256	258	2	60	62	320	361	4	1.13
2019	3	250	253	1	64	65	318	374	4	1.18
2020	4	225	229	3	44	47	276	332	7	1.20
2021	6	194	200	2	39	41	241	317	8	1.32
2022	1	197	198	2	47	49	247	284	3	1.15

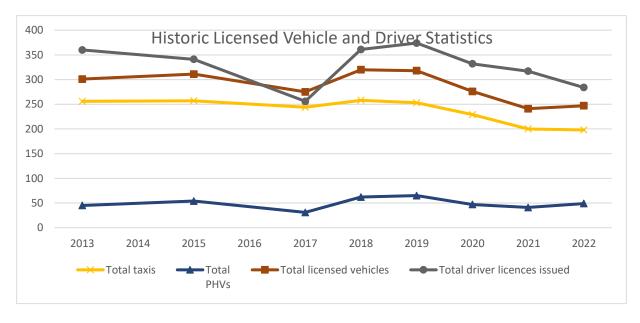
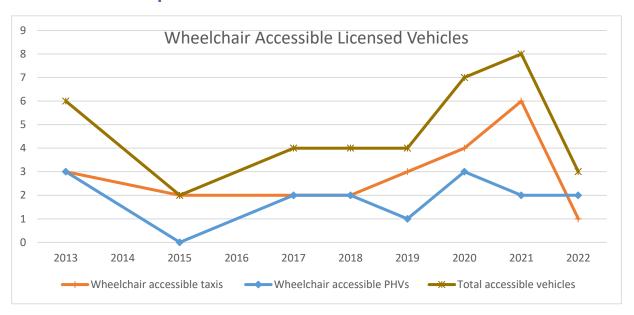


Figure 1 - Historic profile of licensed vehicles and licensed drivers

Table 2 - Historic profile of wheelchair accessible licensed vehicles





Comparative information to other authorities

Table 3 compares recent licensed vehicle numbers for East Herts with other authorities in the DfT East Region. The table is ordered in increasing proportions of total licensed vehicles per 1,000 population. Data was derived from DfT statistics published in 2022, which were the latest statistics available at the time of publication.

It should be noted that the DfT statistics indicate a total of 198 hackney carriages in East Herts. However, at the time of writing, the total hackney carriages licensed was 203 in East Herts.



Table 3 - Licensed vehicle proportions

		ı	1	1	1	1	
					Hackney	Private Hire	Total licenced
	Mid 2020				Carriages per	Vehicles per	vehicles per
	population	Hackney	Private Hire	Total licenced	1,000	1,000	1,000
Licensing Area	estimate	Carriages	Vehicles	vehicles	population	population	population
East Hertfordshire [Limited]	151,786	198	49	247	1.3	0.3	
Braintree [Limited]	153.091	83	227	310	0.5	1.5	
Southend-on-Sea [Limited]	182,773	269	136	405	1.5	0.7	
Colchester [Limited]	197,200	131	408	539	0.7	2.1	
Stevenage [Limited]	88,104	100	148	248	1.1	1.7	
Bedford [Limited]	174,687	63	495	558	0.4	2.8	
Cambridge [Limited]	125,063	305	99	404	2.4	0.8	
Watford [Limited]	96,623	221	114	335	2.3	1.2	
Luton [Limited]	213,528	165	733	898	0.8		
Mid Suffolk [No Limit]	104.857	56	40	96	0.5		
Fenland [No Limit]	102,080	91	39	130	0.9		
Breckland [No Limit]	141,255	118	72	190	0.8		
South Norfolk [No Limit]	143,066	119	74	193	0.8		
Chelmsford [No Limit]	179,549	166	84	250	0.9		
Thurrock [No Limit]	175,531	72	174	246	0.4	1.0	
Welwyn Hatfield [No Limit]	123,893	106	78	184	0.9		
King's Lynn and West Norfolk [No Limit]	151,245	88	143	231	0.6		
Maldon [No Limit]	65,401	83	20	103	1.3		
East Cambridgeshire [No Limit]	90.172	112	32	144	1.2		
East Suffolk [No Limit]	250,373	71	355	426	0.3	1.4	
Central Bedfordshire [No Limit]	294,096	175	329	504	0.6		1.7
Tendring [No Limit]	147,353	230	27	257	1.6		
Basildon [No Limit]	187,558	137	199	336	0.7	1.1	1.8
Hertsmere [No Limit]	105,471	3	191	194	0.0		
Babergh [No Limit]	92,735	79	96	175	0.9		
Dacorum [No Limit]	155,457	184	112	296	1.2	0.7	
North Hertfordshire [No Limit]	133,463	186	74	260	1.4	0.6	
Epping Forest [No Limit]	132,175	216	42	258	1.6		
St Albans [No Limit]	149,317	204	105	309	1.4		
North Norfolk [No Limit]	105,167	144	85	229	1.4	0.7	
Brentwood [No Limit]	77,242	172	27	199	2.2	0.3	
Broxbourne [No Limit]	97.592	194	70	264	2.0		
Harlow [No Limit]	87,280	47	195	242	0.5	2.2	
Three Rivers [No Limit]	93,966	11	258	269	0.1	2.7	
West Suffolk [No Limit]	177,302	181	327	508	1.0		
Broadland [No Limit]	131,931	0	401	401	0.0		
Rochford [No Limit]	87,627	185	89	274	2.1	1.0	
Great Yarmouth [No Limit]	99.198	190	160	350	1.9		
Huntingdonshire [No Limit]	178.985	190	575	676	0.6		
Ipswich [No Limit]	135,979	157	425	582	1.2	3.2	
Norwich [No Limit]	142,177	220	389	609	1.2		
Peterborough [No Limit]	202,626	110	877	987	0.5		
	90.524	110	341	987 458	1.3		
Castle Point [No Limit]			341 857	458 862	1.3		
South Cambridgeshire [No Limit]	160,904	5					
Uttlesford [No Limit]	92,759	47	1,961	2,008	0.5	21.1	21.6



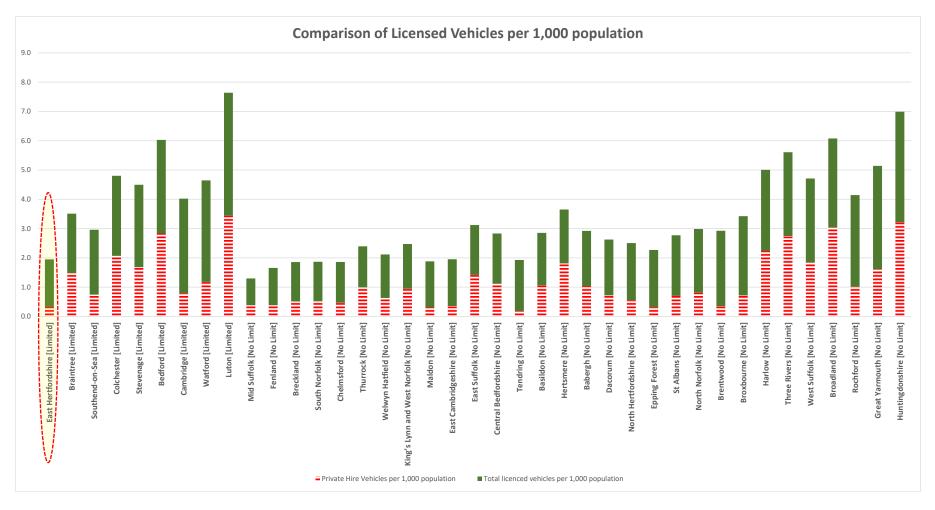


Figure 2 - Comparison of licensed vehicles per 1,000 population



The order in which the data in Table 3 and Figure 2 is presented, is ranked in increasing order of provision of all licensed vehicles. Therefore, the higher the ranking number, the greater the provision per 1,000 population, compared with other authority areas.

In terms of total licensed vehicles, Table 3 indicates that East Herts is ranked 1 out of 9 authority areas in the region, which limit the number of hackney carriages. In terms of all authority areas both limited and non-limited, East Herts is ranked 11 out of 45 authority areas. These statistics suggest that East Herts has a relatively low level of provision of licensed vehicles, compared with other authorities in the region.

When we look at hackney carriages only, East Herts is ranked 32 out of all 45 authorities in terms of hackney carriages per 1,000 population. In terms of those authorities which limit the number of hackney carriages, East Herts is ranked 6 out of the 9 authorities.

The proportion of private hire vehicles per 1,000 population in East Herts is ranked 4 out of all 45 authorities in the region. Of those authorities which limit the number of hackney carriages, East Herts is ranked 1 out of the 9 authorities.

Additional influences on licensed vehicle provision

Amongst some in the licensed vehicle trade, there is a view that in some licensing areas it particularly easy, cheap or quick to become a licensed vehicle driver and to license a hackney carriage or private hire vehicle. Consequently, some licensing areas have particularly high ratios of licensed vehicles to population.

The higher ratios in some licensing areas relate to a proportion of drivers and vehicles operating in other licensing areas as private hire vehicles. In particular, Wolverhampton has developed a reputation as an authority which will license drivers and vehicles quickly, enabling those licensed vehicles to operate around the country in other authority areas. In addition to vehicles licensed by Wolverhampton, vehicles in other licensing areas are also operated in areas outside the licensing authority area. In such cases, 'out of area' vehicles may be seen operating as private hire vehicles hundreds of miles away from the areas in which they are licensed.

When considering the number of private hire vehicles licensed in an area and comparing with hackney carriage numbers, it is prudent to consider the way in which some private hire vehicles are operated. It is perhaps natural to assume that all private hire vehicles are operating as 'public facing' licensed vehicles which may be hired for short trips on an ad hoc basis, either for immediate hire or

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for a future time. However, not all private hire vehicles are operated in this manner. Many private hire vehicles are used primarily or solely to undertake contract hires, or chauffeur or corporate hire services. Premium vehicles are often used for such services. Such services are not generally 'public facing'. For example, these private hire vehicles would rarely operate at peak times such as Friday and Saturday nights, carrying passengers to and from licensed premises.

The proportion of the private hire fleet in a licensing area, which is not public facing, or which is not operating in the licensing area to service the demand for immediate hires, can vary significantly between areas. Larger cities tend to have larger numbers of private hire vehicles which engage in premium corporate hire or chauffeur type work.

In East Herts, there are several firms which specialise in chauffeur type services. However, it is not feasible to estimate the proportion of the private hire fleet in East Herts which is not normally engaged in public facing hire activities.

Feedback from the trade in East Herts suggests that there are some licensed vehicles registered in other licensing areas, which operate in East Herts. It is likely that these vehicles operate either through local private hire operators or through online app based services, such as Uber or Bolt.



Fares

A copy of the taxi fares tariff is presented below:

TABLE OF FARES FOR HACKNEY CARRIAGE VEHICLES from 5th August 2022

Rates 1, 2 and 3 apply to vehicles licensed to carry up to 4 passengers and vehicles licensed to carry up to 8 passengers, but carrying 4 or less passengers.

Rates 2, 3 and 4 apply to vehicles licensed to carry up to 8 passengers when carrying 5 or more passengers, at the times/days which apply to rates 1, 2 and 3 respectively.

If the distance does not exceed 1000 yards, for the whole distance	Fare up to 1000 yards	each additional unit of 190 yards or part thereof	Metric Conversions 1000 yards = 914 metres (approx)
Rate 1 For hirings between 6.30am and 10pm Monday to Saturday inclusive	£4.00	£0.30	190 yards = 174 metres (approx)
Rate2 For hirings begun between 10pm and 6.30am Monday to Friday inclusive and from 10pm on Saturday to 6.30am on Monday, and all day on Bank Holidays	£5.00	£0.40	Fares are charged at both time and distance.
Rate 3 For hirings on Christmas Day, Boxing Day, New Year's Day and after 6pm on Christmas Eve and New Year's Eve.	£7.50	£0.50	Waiting time: Rate 1 - £25 per hour Rates 2, 3 & 4 £30 per hour
Rate 4 For hirings on Christmas Day, Boxing Day, New Year's Day and after 6pm on Christmas Eve and New Year's Eve.	£9.50	£0.70	

(ALL FARES ARE INCLUSIVE OF VAT WHERE APPLICABLE)

Complaints should be made to the Taxi Licensing Officer 01279 655261, extension 1503, quoting the vehicle registration mark/licence number or the driver's badge number.

01279 655261





Extras

For luggage carried outside passenger compartment	. 20p per item (max £1.00)
Trained dogs to assist the blind or hard of hearing	no charge
Other dogs (carried at driver's discretion)	20p

The driver may recover from the hirer a cost not to exceed £150 if fouling/soiling occurs leading to the vehicle being taken out of service

For each additional passenger (other than the first passenger), a charge of £0.20 per passenger up to a maximum of £0.60 for any one journey

The driver may require the hirer, or the passenger, to pay the congestion or toll charge if the journey includes roads that are subject to that charge.

TAXIS MUST USE THE METER ON ALL JOURNEYS WHICH START AND END WITHIN EAST HERTS. The meter need not be used on journeys which terminate beyond East Herts District boundary, and when the hirer and the driver have agreed the price before the journey commences.

INSTRUCTIONS for when plying for hire

DOGS trained to assist the blind or hard of hearing **MUST** be carried unless the driver is medically exempt. Other animals are carried at the driver's discretion.

FOR HIRE lights must be extinguished when the vehicle is booked. When the hire lights are lighted the driver cannot refuse a hiring, without a reasonable excuse and the 'For Hire' light can only be switched on within the area of East Herts.

NOT

It is an offence to dishonestly make off without payment for goods or services, knowing the payment on the spot was required and expected. Contrary to Section 3 Theft Act 1978



Figure 3 - Maximum table of fares

Private Hire and Taxi Monthly magazine publish monthly league tables of the fares in Licensing Authorities in the UK. The Tariff 1 fares for a two mile journey (distance costs only) are compared and ranked. The lower the ranking number, the more expensive the journey, compared with other authorities. The December 2022 table indicated that the fares in East Herts were ranked 24 out of 345 authorities listed. This ranking suggests that hackney carriage fares in East Herts are more expensive than average.



Rail passenger growth

There are several railway stations in East Herts, which are served by taxi ranks or a private hire booking offices. The busiest rank is in Bishop's Stortford. The taxi rank outside Bishop's Stortford station is located within the railway station property. The rank at Bishop's Stortford station is operated under a franchise agreement with a single operator. Only hackney carriages affiliated with that operator are permitted to operate from the rank at Bishop's Stortford station.

Hackney carriage activity was monitored at four of the railway stations in East Herts. The level of rail passenger volumes at each station is likely to influence the level of licensed vehicle hires associated with each location.

Table 4 and Figure 4 illustrate historic passenger numbers passing through the four monitored railway stations. Passenger numbers during the year 2020 – 21 reduced significantly, compared with earlier years, owing to the impact of Covid-19 mitigation measures and travel restrictions. The data for 2021-22 indicates some recovery. However, the number of passengers using the stations has not recovered to pre-Covid-19 levels.

Passenger volumes during 2021 – 22 were between 39% to 49% less than those in 2018-2019, when the last hackney carriage unmet demand survey was undertaken.

Table 4 - Annual passenger entries and exits through selected East Herts railway stations

Year	Bishops Stortford	Ware (Herts)	Hertford East	Hertford North
2009 - 10	2,346,220	792,180	657,574	1,284,168
2010 - 11	2,464,026	838,360	718,590	1,260,999
2011 - 12	2,660,140	871,904	666,550	1,292,690
2012 - 13	2,820,376	970,726	774,547	1,338,227
2013 - 14	2,920,187	1,053,174	794,857	1,373,316
2014 - 15	3,030,210	1,083,188	827,167	1,429,143
2015 - 16	3,104,298	1,131,318	880,042	1,520,498
2016 - 17	3,165,150	1,154,290	935,471	1,616,265
2017 - 18	3,179,796	1,062,048	965,862	1,668,774
2018 - 19	3,259,594	1,074,608	1,313,442	1,258,570
2019 - 20	3,074,350	1,047,118	1,286,402	1,232,658
2020 - 21	712,050	234,248	242,688	232,546
2021 - 22	2,003,538	651,464	674,184	646,018



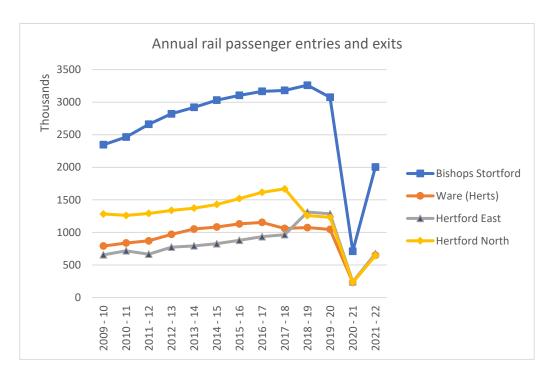


Figure 4 - Annual passenger entries and exits through selected East Herts Railway Stations



3 Patent demand measurement (rank surveys)

Our methodology involved obtaining video footage of activity at all ranks in the licensing area. The video footage was then analysed to identify hours at each rank for which each rank was active.

Video footage was collected from 7:00 on a Thursday morning through to 7:00 on the following Sunday morning. This coverage ensured that weekday and weekend activity was represented.

In addition to formal marked ranks, some additional locations were included in the video footage, as informal rank locations which may be used from time to time.

The formal ranks surveyed were:

- Bishop's Stortford Railway Station
- Fore Street, Hertford
- Hertford North Station
- North Street, Bishop's Stortford
- Railway Street, Hertford
- Riverside, Bishop's Stortford Shopping Centre
- Riverside, Bishop's Stortford Wetherspoons
- Ware High Street 1 (West end of High Street near Burgage Lane)
- Ware High Street 2 (near the junction with New Road)
- Ware Station

Informal rank locations were:

- · Bull Plain, Hertford
- Anchor Street, Bishop's Stortford
- Hertford East Station

The ranks at Bishop's Stortford Railway Station and Hertford North Station are not on public land. These ranks requires vehicles waiting on the ranks to have a permit to operate there. Consequently, not all of the hackney carriage fleet may operate from these ranks.

The informal rank locations were located close to active night time economy premises, or an active railway station.

The following figures illustrate the levels of usage observed at each of the ranks observed.



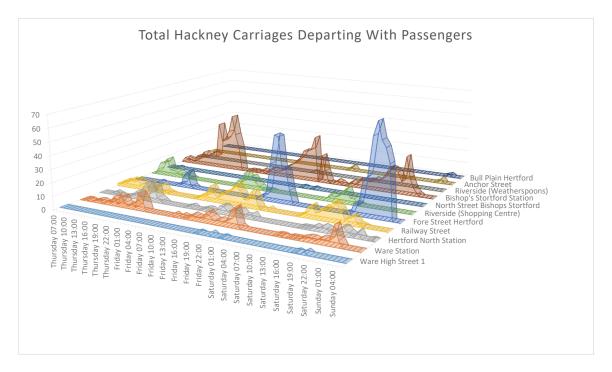


Figure 5 – Hourly volume of hackney carriages departing each rank, with passengers

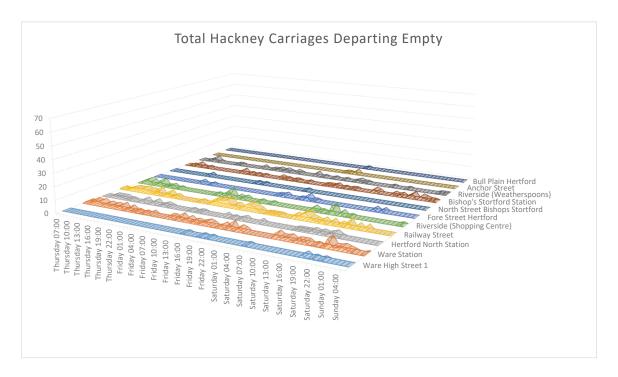
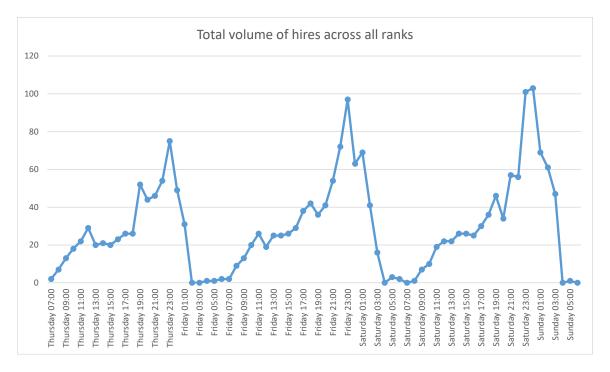


Figure 6 - Hourly volume of hackney carriages departing each rank, without passengers





Daily summary data

The observed data at each rank is summarised in the following tables, for each day of observation and as aggregate values for all 3 days surveyed.

Table 5 - Daily rank statistics Thursday to Friday

		Total hackney			
	Total hackney	carriages	Total hackney		
	carriages	departing the	carriages	Total passengers	Average
	departing the	ranks with	departing the	departing the	passengers per
Rank location	ranks empty	passengers	ranks	ranks	hackney carriage
Total for all locations	149	582	731	737	1.3
Ware High Street 1	0	0	0	0	0.0
Ware Station	38	65	103	85	1.3
Hertford North Station	22	66	88	87	1.3
Railway Street	38	70	108	97	1.4
Fore Street Hertford	3	30	33	42	1.4
Riverside (Shopping Centre)	23	62	85	75	1.2
North Street Bishops Stortford	2	1	3	1	1.0
Bishop's Stortford Station	11	288	299	350	1.2
Riverside (Weatherspoons)	12	0	12	0	0.0
Anchor Street	0	0	0	0	0.0
Bull Plain Hertford	0	0	0	0	0.0



Table 6 - Daily rank statistics Friday to Saturday

Rank location	Total hackney carriages departing the ranks empty	Total hackney carriages departing the ranks with passengers	Total hackney carriages departing the ranks	Total passengers departing the ranks	Average passengers per hackney carriage
Total for all locations	172	768		1066	
Ware High Street 1	3	4	7	8	2.0
Ware Station	37	74	111	97	1.3
Hertford North Station	11	47	58	63	1.3
Railway Street	54	139	193	173	1.2
Fore Street Hertford	11	207	218	346	1.7
Riverside (Shopping Centre)	16	52	68	61	1.2
North Street Bishops Stortford	3	2	5	3	1.5
Bishop's Stortford Station	14	237	251	305	1.3
Riverside (Weatherspoons)	17	1	18	1	1.0
Anchor Street	5	5	10	9	1.8
Bull Plain Hertford	1	0	1	0	0.0

Table 7 - Daily rank statistics Saturday to Sunday

Rank location	Total hackney carriages departing the ranks empty	Total hackney carriages departing the ranks with passengers	Total hackney carriages departing the ranks		Average passengers per hackney carriage
Total for all locations	156		955	1327	1.7
Ware High Street 1	5	3	8	6	2.0
Ware Station	38	47	85	67	1.4
Hertford North Station	16	39	55	62	1.6
Railway Street	41	106	147	164	1.5
Fore Street Hertford	4	354	358	680	1.9
Riverside (Shopping Centre)	18	49	67	66	1.3
North Street Bishops Stortford	0	0	0	0	0.0
Bishop's Stortford Station	25	192	217	260	1.4
Riverside (Weatherspoons)	9	1	10	3	3.0
Anchor Street	0	5	5	12	2.4
Bull Plain Hertford	0	3	3	7	2.3



Table 8 - Aggregate rank statistics Thursday to Sunday

		Total hackney			
	Total hackney	carriages	Total hackney		
	carriages	departing the	carriages	Total passengers	Average
	departing the	ranks with	departing the	departing the	passengers per
Rank location	ranks empty	passengers	ranks	ranks	hackney carriage
Total for all locations	477	2149	2626	3130	1.5
Ware High Street 1	8	7	15	14	2.0
Ware Station	113	186	299	249	1.3
Hertford North Station	49	152	201	212	1.4
Railway Street	133	315	448	434	1.4
Fore Street Hertford	18	591	609	1068	1.8
Riverside (Shopping Centre)	57	163	220	202	1.2
North Street Bishops Stortford	5	3	8	4	1.3
Bishop's Stortford Station	50	717	767	915	1.3
Riverside (Weatherspoons)	38	2	40	4	2.0
Anchor Street	5	10	15	21	2.1
Bull Plain Hertford	1	3	4	7	2.3

During the 2022 survey 2,149 hires from ranks (hackney carriages departing with passengers) were observed. The equivalent number of hires observed during the 2019 survey was 2,645. Therefore, the number of hires observed has dropped by approximately 19%.

The pattern of change varied by location. Differences between the 2019 and 2022 observations at the most active ranks are presented in Table 9.

Table 9 - Differences in observed rank hires, comparing 2019 with 2022 survey results at key ranks

			Relative change
			compared with 2019
Rank	Hires observed 2019	Hires observed 2022	observations
Bishop's Stortford railway station	969	717	-26.0%
Riverside (shopping centre), Bishop's			
Stortford	243	163	-32.9%
Fore Street, Hertford	542	591	9.0%
Hertford North railway station	367	152	-58.6%
Railway Street, Hertford	342	315	-7.9%
Ware railway station	90	186	106.7%

Passenger waiting

Passenger waiting occurred from time to time throughout the day on each day surveyed and at night.

A profile of the number of waiting passengers is presented in Figure 7.



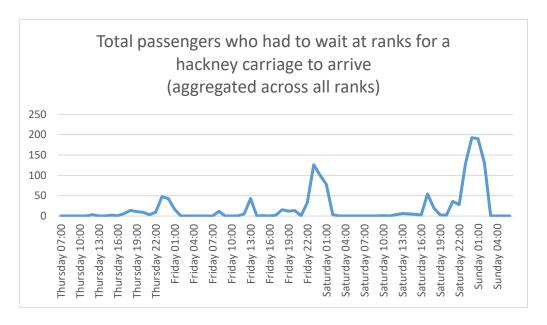


Figure 7 - Profile of waiting passengers per hour

The total number of waiting passengers was 1,412 passengers (45% of all passengers). The passenger waiting was largely concentrated on Bishop's Stortford Station rank and the Fore Street rank in Hertford.

The number of waiting passengers and the duration of waiting is taken into account when assessing whether the level of unmet demand is significant.

Hertford Ranks

The ranks in Hertford included Fore Street, Hertford East Station, Hertford North Station, Railway Street and Bull Plain.

The rank on Fore Street is a night time only rank. The rank operated intensively on Friday and Saturday nights. Some passenger waiting was observed at this rank on Friday and Saturday nights. Passenger waiting was more extensive on Saturday night than on Friday night. A taxi marshal was present late at night to help with passenger queue control. At times, passengers approaching the rank late on Saturday night, attempted to approach hackney carriages which were driving towards the rank, in order to avoid having to wait amongst people already waiting at the rank. However, generally drivers rejected these approaches and drove to the taxi rank to pick up waiting passengers. For much of the operational period of the rank on Fore Street, parked vehicles used up most or all of the rank space. The hackney carriage drivers generally formed a rank from the bus stop space, ahead of the rank, in order to form a rank using space available, whilst the formal rank was occupied by parked vehicles.

The Fore Street rank was used during the daytime and into late evening. Passenger waiting was rare at this rank.



At the rank at Hertford North railway station passenger waiting was observed occasionally. Passengers who had to wait were generally those who arrived by train but reached the rank after other passengers had hired the waiting hackney carriages. The wait times for passengers at this rank were generally less than 5 minutes. The rank space at the station was often used by other vehicles waiting for arriving passengers.

No hackney carriages were observed waiting at Hertford East railway station and a handful of hackney carriages were observed waiting late on Friday and Saturday nights at Bull Plain.

Ware Ranks

The rank at Ware Station, on Station Road, was active throughout each day. However, the level of activity was variable and generally low. The rank is adjacent to a private hire booking office and there were often hackney carriages servicing the rank which appeared to be associated with the booking office.

Two ranks were marked on High Street in Ware. The western rank (High Street 1) is a night time rank. During the daytime, the rank space may be used for short term parking. The rank was generally fully occupied by parked vehicles at night. Hackney carriages were occasionally observed waiting on the rank, when a space became available between parked vehicles. The number of observed hires was low.

The eastern rank on the High Street, Ware, was also a night time rank. This rank also had parked vehicles occupying the rank space at night. No hackney carriages were observed waiting at this rank.

Bishop's Stortford Ranks

The ranks in Bishop's Stortford included Riverside at the Shopping Centre, Riverside at Wetherspoons, Bishop's Stortford Station, North Street and an informal rank on Anchor Street.

The rank at Bishop's Stortford station was active from morning until late at night. At night, this rank accounted for the majority of hires in Bishop's Stortford. Passenger waiting was frequently observed at this rank on Thursday, Friday and Saturday, from early evening to late at night.

The rank on Riverside, outside the entrance to the shopping centre, was active throughout the opening time of the shopping centre. Passenger waiting at this rank was infrequent.

The rank on Riverside at Wetherspoons is a full time rank. The location of the rank means that it would be most likely to be used at night. However, the rank was normally occupied by parked vehicles from early evening to late at night.



Consequently there was often no space for hackney carriages to wait on the rank. Whilst hackney carriages were observed at various times, most of these hackney carriages left the rank without passengers.

The informal rank space on Anchor Street was generally not attended by hackney carriages. However, a handful of hires were observed during the early hours of Saturday and Sunday mornings.

The rank on North Street is a night time rank. This rank was generally occupied by parked cars in the evenings, limiting the opportunity for hackney carriages to wait on this rank. A very few hires were observed at this rank.

Hackney carriages working from ranks profile

During the ranks surveys, the time taken for a hackney carriage to return to the rank, having picked up a fare, was recorded for a sample of hackney carriages. This information provides an estimate for the time hackney carriages spend on rank based hires. When this information is coupled with the vehicle queue lengths at the ranks, we can estimate how many hackney carriages are working from the ranks at any given time, (i.e. those waiting on the ranks and those which are engaged on hires and returning to the ranks.)

Based on a hackney carriage fleet size of 203, the following graph indicates our estimate of the profile of the proportion of the fleet which is engaged on rank based hires during each hour.



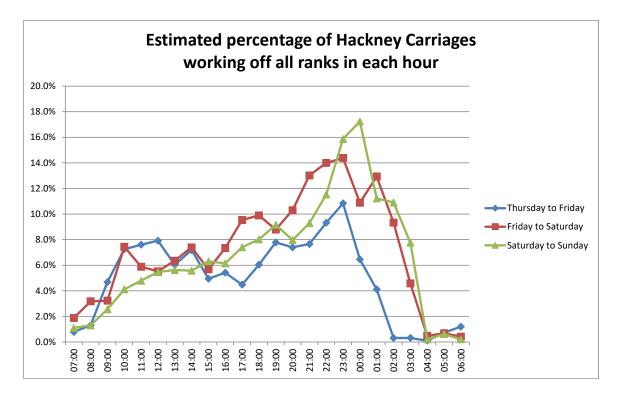


Figure 8 - Proportion of hackney carriages working off ranks

Normally one would expect to see between 25% and 60% of the fleet in operation (depending on time of day and day of the week), in locations where the trade predominantly focus on rank hire work. However, where much of the trade is engaged in pre-booked hires obtained either through booking circuits or direct telephone bookings, then the proportion of the hackney carriage fleet operating from the ranks would be expected to be lower. The low levels of deployment in East Herts indicate that some of the trade are likely to be engaged on pre-booked hires, reducing the numbers operating from ranks.



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.

An online survey was developed and links to the survey distributed by website and social media. A total of 208 responses were received.

East Hertfordshire Public Attitude survey results

When analysing the results obtained from the survey data, we need to consider factors which may influence the results of the survey. Online surveys are often used by people who have particular issues to raise with respect to the subject under consultation. Whereas, people with no strong views or who have not experienced any problems or particular benefits, are less likely to participate. Consequently, issues identified may be over represented.

The results from the online survey are presented in the following table.

Table 1 - Public consultation survey results

Question	Response	Respondents
In the last three months, have you made one or more trips by	Yes	83%
taxi or private hire vehicle in East Hertfordshire?	No	17%
For your most recent trip by	Private Hire Vehicle	49%
licensed vehicle, what kind of	Hackney Carriage	35%
licensed vehicle did you use?	Don't recall	16%
How do you normally obtain a	At a taxi rank	29%
How do you normally obtain a hackney carriage within this area?	Book by telephoning a company	43%
arear	Book online or via a mobile app	28%



Question	Response	Respondents
Respondents were asked to identify valid means of hiring a private hire vehicle. This question was asked to check the	Identified only correct means of hiring a private hire vehicle	67%
level of understanding of the differences between how private hire and hackney carriage vehicles may operate	Identified one or more incorrect means, or didn't know.	33%
For what reasons have you used	Medical	8%
hackney carriages or private hire	Personal business	2%
vehicles in the East Herts area?	Leisure	78%
(please list all reasons in the last	Work	34%
3 months)	Education	6%
,	Shopping	14%
	Morning	17%
What was the approximate time	Afternoon	13%
of day of your last licensed	Evening	35%
vehicle trip?	Night	30%
	Don't recall / not applicable	5%
 Regarding your last trip in a	Aspect	Average rating
licensed vehicle, could you rate	Cleanliness of interior	3.98
the following aspects of the trip	Cleanliness of exterior	3.93
with a rating of 1 to 5? (1 being	General condition	3.95
poor and 5 being very good)	Driver helpfulness	3.88
poor and a semigree, good,	Driver appearance	3.81
	Up to £5.00	1%
	£5.01 to £10.00	27%
 Regarding your last taxi trip,	£10.01 to £15.00	31%
could you tell us how much was	£15.01 to £20.00	11%
the fare paid? Please choose the	£20.01 to £25.00	5%
price range most applicable.	£25.01 to £30.00	7%
price range most applicable.	£30.01 to £40.00	9%
	£40.01 to £50.00	3%
	Over £50	6%
	Not enough	63%
Regarding the number of hackney carriages in East Herts,	About the right number	13%
do you feel there are:	Too many	3%
	No opinion/ Don't know	21%



Question	Response	Respond	dents
What improvements (if any) would you like to see to hackney carriages services in East Herts?	Responses incl representative state Cheaper fares More regulated There needs especially at waget home Shorter waiting Consistently hanorth I would like to standards of oprivate hire vertown late at appalling. The bother to indoptional and poptional and	d charging. to be more taxis veekends it is often g times/more available ave them available a see the council enforcements. I often driving for licensed ehicles. I often driving had their ey show no courte icate, see road make ark in the middle of the ea system of regul of reporting bad driving turday evening for perform London as other than just tow	following a available difficult to bility at Hertford orce better taxis and re through driving is esy, don't arkings as f the road. ar re-tests ving to the station on beople that we centre
	 I don't really of just want more should be encounted in the area as app based served. More available ready at station. More private Stortford and private of stortford an	care if I get a cab or re access to more buraging more Ubers they provide the movice e on Sunday mornions hire cabs needed i particularly at Stansform outside houses, you wailable, it's danger at night with the hu	an Uber I units. We to operate ost flexible ngs, more n Bishop's ted Airport, this helps rous as a uge lack of w the local axi rank tiside Ware in Bishops



Question	Response	Respondents
	last few months. A More Marshalled ta More taxis available rank. 1 exclusive of enough. Taxis outside treating the Hertford North Improved access women Opening up the expensive taxi fare of the safe for traffic jams in the expensive taxi fare of the safe for t	e at the Bishop's Stortford company using this is not rain stations, especially for rural areas for lone road between Parliament eet would aid the ridiculous dertford and mean less es. have been turned down by times when it's dark and or me to walk ess for booking never had any issues with ning and at night it is a ale I often get a taxi home 15min walk from town but safe walking home on my 't get taxis later in the ugh facilities to get a taxi fter an evening out. Hertford North Station for rom Stevenage. But, the where the money is. et fares for local/ short rank from Fore Street in ok to save disappointment few and far. The taxi coned off area) at Bishops cion is absolutely ridiculous design someone has made



Question		Response	Respondents
	•	Proper accessible whee electric chairs do not fit Stortford nearest fully a ramp is Stevenage. There needs to be more a train home from London, as a woman is anxiety proconfident there will b available at the station an hire means I've had to which is frightening Taxi rank at stations - station has awarded a company who have no avis no other option. Need a rank at Sawbridge Ability to use the exit from London Rd. Taxi office within the prospace for girls particularly cab. More availability for local decline compared to pre-cavailability. Hertford to companies seem to want The short journeys for shore ally difficult to book. Also charge a set fee instead discovered this is not legative.	so living Bishop's accessible with rear available. Getting a especially at night voking as I'm never e sufficient taxis d the lack of private walk home alone Bishops Stortford monopoly to one vailability and there eworth station in the Sextons Rd to oper town centre. A to safely wait for a l trips - significant covid availability axi and minicab to airport runs only. Opping and work are so had a taxi driver of the meter, since
		Design of vehicle	2% 9%
Have you experienced	anv	Driver issues Position of ranks	10%
Have you experienced any			
problems with the local hackney		Delay in getting a taxi /	53%
carriage service? (indicate as		lack of availability	F0/
many as apply)		Cleanliness	5%
		No problems	33%
		experienced	



Responses included the following representative statements:

- Refuse to drive from Stevenage station to Walkern. Multiple times have been refused carriage due to taking a small dog that can sit on my lap. Religious reasons given which are not acceptable.
- If I know I am going to need one I usually book in advance. It can be very difficult getting one last minute and I will only use licensed Hackney cabs.
- Got off train at Hertford north in the dark, early evening no taxis
- Driver had no clue of area and took me opposite direction & then became rude
- None at rank when raining
- Hertford North taxi rank not always well served
- Long wait at rank in Hertford
- None at the station on several occasions when I came off the train
- There are not enough vehicles at peak times. Resulting in long waits or inability to get a taxi.
- Lack of taxis in Stortford particularly late at night
- Not enough taxis available at Bishops Stortford station taxi rank at night. The wait is appalling.
- Couldn't get a taxi from Hertford East so had to walk to rank however last one drove off so walked to other rank and waited till one turned up
- Waiting outside at the station queues of over 10 people numerous times late at night in horrible weather conditions
- At Bishop's Stortford station there is not enough taxis
- Coming back around 10pm from London last month - no cabs at station, when one did turn up, no functioning seatbelt and dirty
- The fares post Covid became so much more expensive. Particularly when they are surcharged where hackney carriage fares are around double a private hire charge
- When covid restrictions were in place Metro taxis ignored them. They never take card only cash always making you stop at a cashpoint because they don't want to declare it. Drivers smoke so cars stink.
- Drivers frequently obstruct Riverside in Bishops Stortford, to talk to each other. Although they

If you have had any problems with the local hackney carriage service, please tell us more, perhaps providing an example with a time and place where a problem occurred.



Question	Response	Respondents
	usually move they sometime on the pavement to get and I arrived at Hertford East 7.30pm) no taxis outside staxi ranks in the town (For Old Cross) all empty! Driver had been smoking cigarette smoke Refused to come to Wall station. Too dangerous! (clear of ice and snow and route, so well gritted anyward 15th Dec.). Also many refusing a rural area where there this year I phoned for a tax had only one driver that we Impossible to get taxis in me booked for school kids! Cab availability, drivers touching phones during when using service. The rank at Stortford stationand laid out. Not clear who often a free for all. Also space so nowhere for private Lack of availability and can minute, arriving around requested time, car interslept in, stained seating/intilike they haven't washed.	on 29th Nov (around tation and walked to 3 re St, Railway St and in the car, it stunk of kern from Stevenage All Main roads were this is on a school bus by! Thursday afternoon se to take dogs: this is are many dogs. Earlier xi, company said they would take a dog! It is nid afternoon as all are chatting on phones, journey, most times on is poorly organised ere to queue from so takes up most of the te hire vehicles to wait celling fares at the last 10 minutes after the iors smelling like it's
	Better vehicles More hackney carriages I	6% 56%
What would encourage you	could phone for	00/
		9% 58%
use them more often (top two reasons)	More hackney carriages I could hail or get at a rank	J0%0
two reasons)	Better located ranks 37%	
		1%
	Cheaper	1 70



Question	Response	Respondents
	No Yes – I need a wheelchair accessible vehicle	87% 3%
Do you consider you, or anyone	Yes – Someone I know needs a wheelchair accessible vehicle	5%
you know, to have a disability that means you need an adapted vehicle? (Not necessarily a licensed vehicle)	Yes –I need an adapted vehicle but not a wheelchair accessible vehicle	1%
	Yes – Someone I know needs an adapted vehicle but not a wheelchair accessible vehicle	4%
Are there any locations where	Yes	40%
you would like to see new taxi ranks?	No	22%
	Don't know / no opinion	38%
If you would like to see new taxi ranks, where would these ranks be?	station (where all In the middle of high street Hertford East stati Parliament Sq Walkern Sawbridgeworth Rear of train static Northgate and Tho By Dough and Co Buntingford On the west side north side of ware Bridge Street [Bish Sele Farm shops. St Andrews St	g the day. 4 Stortford railway taxis can wait) town, such as the on orley [Bishop's Stortford] of Hertford and the hop's Stortford] permarkets out of y center



Question		Response	Respondents
How would you rate service provided locarriages in East H rate from 1 to 5. (2 poor and 5 being ver	oy hackney erts? Please I being very	The average rating value	was 3.10
		Seating	10%
Please choose wh	ich of the	Lighting	10%
following features wo		Shelter	33%
to improve ranks in I	East Herts?	Signage	21%
		Don't know / no opinion	26%
In the past three mo to take a hackney of taxi rank in East Her • Given up or	carriage (taxi) ts and:		43.3%
arrangements for tra You didn't expect when you needed so	vel; and/or t any to be		56.7%
	Weekday day	time (7.00 to 18.00)	17%
	Weekday eve	ening (18.00 to 22.00)	26%
	Weekday nig	ht (22.00 to 7.00)	13%
Please tell us when you gave up and	Friday or Sat 18.00)	curday daytime (7.00 to	4%
made alternative arrangements?	Friday or Sat 22.00)	curday evening (18.00 to	9%
	Friday or Sat 7.00)	curday night (22.00 to	26%
	Sunday dayt 22.00)	ime or evening (7.00 to	3%
	Sunday night	t (22.00 to 7.00)	2%
		Up to 10 minutes	18%
		10 to 20 minutes	21%
Have large was the times that you		20 to 30 minutes	18%
		30 to 60 minutes	12%
		60 to 90 minutes More than 90 minutes	3%
waited?	How long was the time that you		2% 26%
waiteu:		I knew that it was unlikely any taxis would	ZU70
		be available, so I didn't	
		even bother trying the	
		rank	



Question	Response	Respondents
Have you wanted to hire a hackney carriage by flagging down (immediately hiring the vehicle in the street without prebooking or being at a rank), in	Yes	18%
the last three months, and: Given up or made alternative arrangements for travel; and/or You didn't expect any to be available when you needed so you didn't try. 	No	82%
	No difference	66%
Thinking back to before the pandemic do you think that your use of east Herts licensed	I use licensed vehicles less now, compared with prior to Covid-19	22%
vehicles is different now to then?	I use licensed vehicles more now, compared with prior to Covid-19	12%

Reasons given for increased use included the following, in decreasing order of frequency:

- I go out more for work to the station or to go out with the girls more
- Don't use buses since pandemic, only taxis, at least eight times per week.
- I use Uber more
- Health reasons after having covid
- Less parking in towns easier to get taxis
- Travel to and from work
- I use them sometimes to go shopping as parking in Hertford is bad
- As I don't drive I rely on taxis to help me get about when need to for work or appointments or shopping where I cannot walk sometimes
- No car

Reasons given for reduced use included the following, in decreasing order of frequency:

- Less available [so used less often]
- I go out less in the evening especially at weekends as I'm not confident about how I'm getting home
- Lifestyle changes so less need
- It's too expensive now
- Fewer business trips in person. They are now being done online
- Family are more likely to pick me up. Cost of parking in town greatly increased. Would use more for leisure reasons ie drinking



Question		Response	Respondents
		Yes and I would pay up to 20% more in fares to select that kind of vehicle	13%
		Yes, but I would not pay any more for that kind of vehicle	29%
Would you support E Council introducing (bef stricter low emission for hackney carriages a	ore 2030) standards	Yes, if there is financial support for the investment	29%
for hackney carriages and Private Hire Vehicles, to allow ONLY low emission vehicles, in line with these policies?		Yes for use in specified lower emission zones like in London and Watford	3%
		No – drivers should be able to choose their vehicles regardless of the impact on the environment and air quality	26%
lower em		se my car less, and use a nission taxi more often a the daytime	10%
	I would u lower en	ise my car less and use a nission taxi more often in the night time	12%
		onsider owning one fewer I currently do	3%
How could lower emission hackney carriages and Private	•	roved air quality would e me to cycle or walk	9%
Hire Vehicles change your travelling ranks wo behaviour: (choose a hackne		roved air quality around uld encourage me to use y carriage more often	7%
as many as relevant)	encourag	these kinds of cars would e me to purchase a lower vehicle myself	6%
	No change to my driving or riding behaviour		74%



Question Response		Response		Respondents		
	Benefit		First Choice	Second Choice	Third Choice	
	Better air q community	uality for wider	46%	47%	2%	
	Better air vehicle) for passengers	quality (in the r drivers and	17%	17%	38%	
What are the top that three benefits (in chearyour opinion) for con-	(WLC) analy that best in c		7%	15%	33%	
emission vehicle? (choose 3)	mission vehicle? Customer		3%	4%	7%	
	that offer fi	existing grants inancial support tion of ULEVs as	2%	9%	7%	
		pact on climate er carbon dioxide missions)	25%	9%	13%	
Do you have regular (whether owned or	borrowed)		Yes		89%	
another form of transport?	of motorise	ed No	No		11%	
		Yes		2%		
Are you a student?		No	No 98%		98%	
Are you a permanent resident in			Yes		96%	
East Herts?		No			4%	
		Male		34% 63%		
What gender are you	1?		Female			
		Prefer not to		3%		
Which of the followi	ing age group	1C	16 - 30 Years old 8%			
do you fall into?		31 - 33 years	31 – 55 years old Over 55 years old		53% 39%	
,		Over 55 years	Over 55 years old			

Thank you for your patience and cooperation completing this survey. Are there any other comments that you would like to make?

Responses included the following comments:

• If buses ran frequently to Walkern and in the evenings wouldn't need taxis but pathetic 4 buses during day and afternoon and none at weekend or evenings means taxi had to be used to access trains. Herts lynx impossible to book unless days ahead.



Question	Response	Respondents

- Stop Uber and illegal private hire drivers touting for work and killing the hackney carriage drivers work.
- I approve of the strict regulations East Herts imposes on licensed taxi drivers and that's why I only use them.
- Free/cheap late night shuttle buses between town centres and local train stations.
- Associated are the only taxis I would use I have answered my questions based on this.
- Wheel chair access vehicles desperately needed in Bishops Stortford
- Uber are much less reliable
- I would prefer a greater access to more private hire vehicles and drivers than hackney carriage. It is much easier to book online/app than trying to hail or go to a rank. Your discriminatory test has had much more impact than focusing on one part of the taxi industry.
- Improve private hire compliance and safety
- I don't really care if I get a cab or an Uber I just want more access to more units. We should be encouraging more Ubers to operate in the area as they provide the most flexible app based service - we should not be focusing on a rank based system it's outdated and not flexible - app based services is what's required
- One day you set yourself the rules that you don't follow! You also give a license for cars that are older than 5 years at the time of first registration and a maximum of 10 years at the extension of the license, then here in Bishops Stortford taxis that are 15 years old and older drive. You only have to follow the rules that you have determined yourself!!
- Regularly have to call three or four cab firms to be able to book a car for the same day.
- Please just get more taxis available to us
- Have found it much harder to book a licensed mini cab locally in Sawbridgeworth with often nothing available. The two firms I use have said they are struggling to find drivers
- There is a huge lack of taxis in bishops Stortford, it's really frustrating and also unsafe
- We need more cabs in East Herts (Bishops Stortford and Sawbridgeworth especially)
- My Husband and I depend on our local Taxes use my local one First.
- Living in a village it's almost impossible to get a taxi from either Ware or Bishops Stortford. Also to be noted the cost of same journey before and after Covid has doubled - from £11 to £22
- Why are long standing trusted & reliable local drivers who need assistance to pass / take a written test, but can drive safely, not being helped to continue with their jobs.
- On numerous occasions there have been no taxis to book or hail. Long wait time.
- We need to support local firms and encourage drivers. Associated Taxis
 run a fantastic service and have an amazing app which could be supported
 by east Herts. I've had many occasions where there are no Metro cabs at



the station. Based out of Harlow they aren't able to serve the community adequately.

- Cabs and taxi are just to expensive now for short local trip
- It is unacceptable for there to be no taxis available late at night in Bishops Stortford. My daughter was stranded at Stortford station at 10pm at night, pouring with rain, no shelter and unsafe to walk home alone. If Metro can not provide the service then they shouldn't have the contract.
- The recent increase in fares implemented by East Herts council on the taxi companies are now making it questionable to use. Instead of sharing a taxi we now drive several cars and park in residential streets perhaps leaving them overnight.
- There is a distinct shortage of taxis in Bishops Stortford and as a result the charges are extortionate. Previously living in London, where reasonable priced taxis are easily available, I find the lack of taxis seriously restricts my usage of the town's shops, restaurants and bars as getting a taxi home is difficult.
- Just need more taxis
- Please abolish the exclusivity of Metro Taxis at Bishops Stortford station.
 The service is poor as there are not enough taxis to meet the demand in
 the evenings, resulting in long waits or giving up on being able to get a
 taxi.
- The taxi rank at Bishops Stortford station is poorly designed causing congestion and delay.
- The service and taxi rank lets Bishops Stortford residents and visitors down.
- The cost is so high that we won't be using them any more.
- Due to the lack of Taxis I have had to start using a company called uber who come from London where I can hail a cab through the app in about 5-10 minutes.
- Cost of taxis and lack of availability has meant that recently I've used taxis from Essex rather than East Herts. Pricing of Bishops Stortford taxis seems ridiculous
- Taxis are harder to book and are more unreliable due to lack of cars and or drivers
- Definitely not enough hackney carriages around Ware and Hertford. Had
 issues with private hire cancelling before being picked up which has left
 me stranded. Luckily flagged a hackney carriage and made it home safely.
 They have always been reliable and we need more of them.
- Clear that useless metro cars off the train station rank they are unreliable and simply cannot serve the demand open it back up to all the taxis
- Waste of time survey, I want cheaper more affordable frequent transport and will guarantee this will not be implemented
- As before, get rid of Metro Cars and use a professional company that actual serves BS not Harlow as it's main town.
- Forcing Taxis to have certain cars, could limit access to legitimate work for some people. We are in an economic crisis.
- I use a private hire driver as he is very helpful with my disability.



- Taxi drivers/operators need some form of relief to offset the rising costs of operating their vehicles and to provide for their families. I honestly cannot see how they make a living.
- Licenced drivers are grumpier than private hire, rarely seem happy to have fares. Often don't know the new estates in north Bishops Stortford well, despite some having been around for 4+ years. Prebooking is often useless as they dispatch around departure time and sometimes vehicles unavailable making prebooking pointless/hazardous for necessary journeys
- Please sort out Bishops Stortford railway station. No shelter. No queue. And metro Cabs are beyond incompetent.
- Awful questionnaire many questions dont apply and yet have no option to that effect.
- You need licensing officer out more night and day to catch unregulated vehicles working in East Herts
- Stop the practice of double and treble rate charging for Sundays and holidays
- More advertisement of carriages from the council, phone numbers, location of taxi ranks
- Taxis provide a vital service in the Hertfordshire towns and need more support and the ability to attract more customer. So many drivers left during and after the pandemic to do other jobs. I need to be able to reliably book a taxi for my dad who is 90 so he can go out. I need to know I can book a taxi home from Hertford North or Broxbourne. I used taxis about 10 times a week before the pandemic. Now it's usually impossible to get them. You need to encourage drivers back to the profession and support this vital service for the community. Essential for the elderly and for women to get home safely at night
- There are not enough wheelchair accessible vehicles. Those that are available, charge EXTORTIONATE amounts of money. This really must be investigated, it's blatent discrimination!
- Public transport (Buses, taxis etc are very very poor in East Herts especially in villages)
- The cost to the villages is prohibitive and there are no evening bus services.
- There are no point in hackney carriage vehicles in East Herts
- Increase the taxi availability at Bishop's Stortford station
- Never enough taxis at the station late at night,
- Far too expensive!
- Nearest wheelchair accessible taxis with rear access come from Stevenage or St Albans is none in East Herts
- In general, it has become nearly impossible to get a cab in East Herts, whether at a rank or booking in advance. The ranks used always to have cabs pre-pandemic and now never seem to. Booking in advance little better and I've often simply not been able to book one (either nobody answers or they're fully-booked already, even days in advance) or been told to ring back when I need it to see if there is availability then, but



that's too big a risk because it could leave me stranded somewhere or having to walk alone late at night which is unsafe. The lack of cabs has put me off going out at all, or I've had to cancel plans, so has knock on effect to hospitality industry.

- Associated Taxis have a very good app but unfortunately recently they
 decided to inflate prices on the app by 50% so people have to either call
 the office and book over the phone or pay an inflated price. I was quoted
 £21 on the app recently so called their office instead and paid £13 on the
 meter. Their drivers always get the meter rate so this is blatant
 profiteering by the firm.
- There has been a noticeable decline in the number of taxis available and the situation at the train station is horrendously laid out taxis have to do three point turns to exit and there is also a number of people in private cars picking up. Situation could be much improved if better laid out
- Please vet drivers very carefully, the selection up to now has been very poor especially with non English drivers.. .they can be rude, aggressive and have criminal records in previous countries they've lived in !
- Metro Taxis in Bishop's Stortrord/Harlow are very good at taking books via the app then changing the price and not telling you till you are in the car and leaving. The app still shows the original price but magically the drivers app shows a different price. When you speak to them they say you entered the wrong post code and we corrected it. Which is a lie as you can see it's correct in the original booking. I will no longer use this company. They promise to call you back to talk about it but never do.
- The town [Bishop's Stortford] badly needs more taxis. There are not enough and current fares are too expensive.
- Availability for local trips in Hertford and surrounding area by pre booking is now very poor and bus services infrequent so it is much harder for those who don't drive to get around independently
- Have more licenced and Hackneyed vehicles available, especially at weekends and early mornings for work.

Pre-booking of licensed vehicles was the most popular method employed.

Frustration regarding availability of hackney carriages, especially at night, was a common issue identified.

Some respondents commented on lack of availability of wheelchair accessible licensed vehicles.



5 Key stakeholder consultation

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

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

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

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

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

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



Supermarkets

All of the supermarkets contacted indicated that they were not aware of any issues with availability of licensed vehicles. Some respondents at information desks were aware of limited availability at night, through personal experience, but didn't feel that supermarket customers were affected during normal shopping hours.

Hotels

None of the hotels contacted felt that there was any particular issue with availability of licensed vehicles during the daytime. Most customers make their own arrangements for a licensed vehicle if required. There can occasionally be some delay in availability in the mornings during 'school run times'. Availability at night could be an issue, but not necessarily affecting hotel guests as a major factor.

Public houses

Opinions of public house representatives varied. Some had no particular awareness of availability. Customers made their own arrangements and availability wasn't a common topic which arose. However, others indicated that they were aware that late at night, the wait times for a licensed vehicle can be longer.

Night clubs

Night clubs in Hertford and Bishop's Stortford were contacted for their views on provision. Responses were limited with few offering any views on availability. Of those who expressed any views, late night availability was the only issue identified.

Restaurants

Restaurants contacted rarely ordered a licensed vehicle for customers. If required, customers often made their own arrangements. No consultees were aware of any issues.

Hospitals

The Herts and Essex Hospital in Bishop's Stortford and the Hertford County Hospital were contacted to discuss whether they were aware of any issues with availability of licensed vehicles. Neither hospital was aware of any issue with availability. Licensed vehicles arrived from time to time at each of the hospitals to drop off and pick up patients. Generally patients or visitors made their own travel arrangements. The hospitals have travel advice pages on their web pages which indicate availability of car parking and charges together with public transport options by bus and train.

Police

The area teams for Hertford, Ware and Bishop's Stortford were contacted. No issues with availability were raised.



Disability and minority interests

Disability and minority groups were contacted, including those representing interests of elderly, visually impaired, mobility impaired and with learning difficulties. Regular suppliers were generally used by those represented. Virtually all travel would be likely to be pre-booked. Wheelchair accessible vehicle provision tended to be provided by specialist providers who target the wheelchair user market.

Rail and other transport operators

Staff at Hertford North and Bishop's Stortford Railway Stations were contacted. The level of usage at both stations was probably lower than pre-covid times, but generally still fairly busy. At Hertford North, there were generally taxis which arrived to meet trains. At Bishop's Stortford, there were generally taxis which arrived to meet trains. However, passengers sometimes had to wait for hackney carriages to arrive. No view was offered about whether passengers were more likely to have to wait at night or during the daytime.

Arriva buses were contacted for any views on licensed vehicle provision and interchange with bus services. No issues were noted with interchange.



6 Trade stakeholder views

The BPG encourages all studies to include 'all those involved in the trade'. An online survey was created and the link to the survey distributed to members of the licensed vehicle trades in East Hertfordshire.

Operators were also contacted for their views on the trade and to obtain information on how rank based hires relate to pre-booked hires of both hackney carriages and private hire vehicles. However, no operators engaged with the consultation approaches.

Online survey results

Members of the licensed vehicle trades were asked a series of questions. The responses to these questions are summarised in this section.

A total of 17 responses were received.

77% of respondents indicated that they normally drove a hackney carriage. A further 18% indicated that they normally drove both hackney carriage and private hire vehicles and 6% didn't normally drive.

All respondents indicated that they were licensed vehicle owners.

13% of respondents indicated that their vehicles were driven by more than one driver.

Respondents were asked how long they had been involved in the licensed vehicle trade in East Herts. 50% had been involved for over 20 years. 25% had been involved for between 3 and 5 years. The remainder had been involved for between 6 and 20 years.

Respondents were asked how many hours they operated each day. The responses varied from 33 hours per week to 127 hours per week. The respondent who claimed to work 127 hours per week indicated that they had one day off per week and all other days they worked between 20 to 24 hours per day. Some other respondents indicated that they worked 7 days per week up to 20 hours per day, for 80 or more hours per week. The average number of hours worked by respondents who didn't claim to work these extended hours was 57 hours per week.

Drivers were asked approximately how many journeys were undertaken during a typical week, which required the carriage of a wheelchair? 72% of respondents indicated none. 20% indicated from 1 to 5 per week and 8% indicated more than 20 per week. This feedback suggests that the carriage of wheelchair passengers is concentrated amongst a small number of providers.



Drivers were asked approximately how many journeys on average each week they pick up from ranks.

	Yes, I normally drive a Hackney Carriage	Yes, I drive both types of vehicles
None	8%	33%
Up to 10 per week	42%	0%
11 to 20 per week	8%	0%
21 to 30 per week	8%	33%
31 to 40 per week	0%	0%
41 to 50 per week	8%	0%
51 to 60 per week	8%	0%
61 to 70 per week	8%	0%
71 to 80 per week	0%	0%
81 to 90 per week	0%	0%
91 to 100 per week	0%	0%
101 or more per week	8%	33%

Respondents were asked how many hires they pick up each week from hailing.



	Yes, I normally drive a Hackney Carriage	Yes, I drive both types of vehicles
None	15%	33%
Up to 10 per week	46%	33%
11 to 20 per week	8%	0%
21 to 30 per week	23%	0%
31 to 40 per week	0%	0%
41 to 50 per week	0%	0%
51 to 60 per week	8%	0%
61 to 70 per week	0%	33%
71 to 80 per week	0%	0%
81 to 90 per week	0%	0%
91 to 100 per week	0%	0%
101 or more per week	0%	0%

Respondents were asked how many hires they pick up each week from pre-booked hires.

	Yes, I normally drive a Hackney Carriage	Yes, I drive both types of vehicles
	Yes, I Hack	Yes, I dr vehicles
None	0%	0%
Up to 10 per week	8%	0%
11 to 20 per week	0%	0%
21 to 30 per week	8%	67%
31 to 40 per week	8%	33%
41 to 50 per week	8%	0%
51 to 60 per week	17%	0%
61 to 70 per week	8%	0%
71 to 80 per week	8%	0%
81 to 90 per week	25%	0%
91 to 100 per week	8%	0%
101 or more per week	0%	0%



Respondents were asked how many hires they pick up each week from regular contracts.

	Yes, I normally drive a Hackney Carriage	Yes, I drive both types of vehicles
None	42%	33%
Up to 10 per week	17%	33%
11 to 20 per week	0%	33%
21 to 30 per week	8%	0%
31 to 40 per week	0%	0%
41 to 50 per week	8%	0%
51 to 60 per week	8%	0%
61 to 70 per week	8%	0%
71 to 80 per week	0%	0%
81 to 90 per week	8%	0%
91 to 100 per week	0%	0%
101 or more per week	0%	0%

Taking all of the responses into account, rank hires accounted for around 26% of all hires.

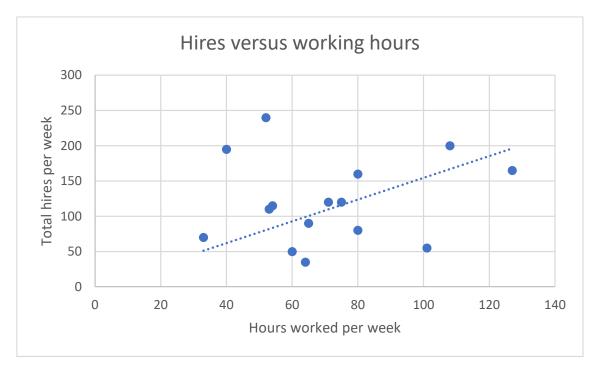
When we compare the total hires per week with the hours worked per week, we would expect to see a relationship around a linear trend line. The number of hires has been plotted against hires, for each respondent, in the following figure.

Whilst some of the results are clustered around the trend line, as one may expect, some of the outliers are less plausible. For example, the highest number of hires per week (aggregated over all types of hire) was 240. The same respondent indicated that they generally worked 52 hours per week. This would imply a rate of hires of 4.6 hires per hour (one every 13 minutes). This rate is significantly higher than the trend line which indicates a rate of 1.6 hires per hour (one every 37 minutes).

The time associated with each hire, includes the time taking passengers to their destination, wait times between hires and dead heading time (time either travelling to the next pre-booked hire, or time spent travelling back to a taxi rank). At peak times, such as Saturday night, the wait time between hires are likely to be shorter. However, most drivers also work during periods of lower demand when there can



be more extensive wait times between hires. The average rate or hires per hour covers both busy and quiet periods.



Respondents were asked if they undertook school contract work and if so, for how many days per week. 75% of respondents undertook school contract work and all of those who undertook school contracts, undertook these contracts 5 days per week.

Respondents were asked if there is sufficient rank space in East Herts District. 82% of respondents felt that there was not sufficient rank space.

When asked if new ranks were required, 77% said yes.

Locations suggested for new ranks included the following:

- Outside Woolpack
- Hertford east railway station
- Bridge Street, next to Council Offices and Market Square

When asked if any existing ranks need more spaces, responses included the following:

- Bishop's Stortford railway station
- Fore Street Hertford
- Railway street
- Riverside Bishop's Stortford
- Sainsbury's Bishop's Stortford
- Riverside Road



All drivers indicated that they had driven licensed vehicles prior to the outbreak of Covid-19. They were asked how demand for hires now compares with demand prior to Covid-19. The majority of respondents felt that demand was similar during the daytime and during the night time hours.

When asked how working hours compared with those prior to Covid-19, 56% felt that they worked more daytime hours (6:00 to 18:00) now. 25% felt that their hours where about the same and 19% felt that they worked fewer daytime hours. Regarding night time hours, 43% of respondents felt that they worked more night time hours, 36% felt they worked similar hours at night and 21% felt they worked fewer hours.

Respondents were asked to compare the hours they worked each week now, with those worked prior to Covid-19.

Change to working hours	Proportion of respondents
Over 20 hours LESS per week now,	6%
compared with pre-Covid	
10 to 20 hours LESS per week now,	0%
compared with pre-Covid	
Up to 10 hours LESS per week now,	0%
compared with pre-Covid	
About the same as pre-Covid	37%
Up to 10 hours MORE per week now,	19%
compared with pre-Covid	
10 to 20 hours MORE per week now,	19%
compared with pre-Covid	
Over 20 hours MORE per week now,	19%
compared with pre-Covid	

94% of respondents were aware of the policy to limit hackney carriage vehicle licences.

Respondents were asked if there are sufficient hackney carriages in East Herts to meet current levels of demand. Responses were as follows:

Yes, too many	24%
Yes, generally sufficient	47%
No, not during all periods	23%
No opinion	6%

Respondents who felt that there are not sufficient hackney carriages at certain times, were asked at which periods are more hackney carriages required. 75% of respondents felt that more hackney carriages were required both during the day and at night. 25% felt that more were required during the evening and at night.



Respondent were told that there are currently 203 hackney carriages licensed by East Herts District and asked how many they felt there should be in the fleet. 12% of respondents felt that the number of hackney carriages should remain at 203. 41% felt there should be more, including 28% who felt that the total number should be 250 or more. 41% of respondents felt that there should be fewer hackney carriages.

When respondents were asked whether the numerical limit on the number of hackney carriages should be removed, 18% of respondents said Yes.

When asked why the numerical limit of hackney carriages should be removed, responses included the following:

- To let new drivers join the trade
- As a multi licence plate owner I need to expand my company
- Because I can only recruit new private hire drivers



When the drivers were asked 'If the limit on the number of hackney carriages in East Herts were removed, what do you think the effect would be on the following features?', the responses were as follows.

	Increase	No effect	Decrease
A Traffic congestion	63%	37%	0%
B Fares	8%	42%	50%
C Passenger waiting times at ranks	7%	73%	20%
D Passenger waiting times at flag down	0%	85%	15%
E Passenger waiting time for telephone bookings	10%	60%	30%
F Hackney carriage vehicle quality	23%	47%	30%
G Private hire vehicle quality	23%	47%	30%
H Effectiveness of enforcement	21%	50%	29%
I Illegal plying for hire by Private Hire vehicles	56%	44%	0%
J Illegal plying for hire by unlicensed vehicles	40%	27%	33%
K Over ranking	71%	8%	21%
L Customer satisfaction	27%	60%	13%

Respondents were asked whether they agreed or disagreed with a range of statements. The results are summarised as follows:



How do you rate the following statements	Strongly Disagree	Disagree	Neither Agree or Disagree	Agree	Strongly Agree
There is not enough work to support the current number of hackney carriages	0%	13%	33%	47%	7%
Removing the limit on the number of hackney carriages would benefit the public by reducing waiting times at ranks	7%	27%	40%	27%	0%
There are special circumstances that make the retention of the numerical limit essential	7%	27%	20%	27%	20%



Respondents were asked to select all of the effects which would apply to them if the Council were to remove the numerical limit on the number of hackney carriages.

Effect	Proportion of respondents
No change	13%
Work more hours	33%
Work fewer hours	4%
Acquire a hackney carriage vehicle licence	0%
Acquire more than one hackney carriage vehicle licence	8%
Switch from hackney carriages to private hire vehicles	0%
Switch from Private Hire Vehicles to hackney carriages	13%
Leave the trade	29%

Government policies and guidance support operation of lower emission vehicles and banning the sale of new fossil fuel vehicles 2030. Respondents were asked if they would support the introduction (before 2030) of more stringent emission standards for hackney carriages, to allow ONLY low emission vehicles, in line with these policies?

Responses were as follows:

Response				Proportion
Yes				23%
No				59%
	depending were applied	on	what	18%

Those who did not support the introduction of tighter emissions standards were invited to provide reasons. Responses included the following:

• Can't afford a new taxi especially after 2-3 years with no income during covid



- Electric only vehicles are too expensive and don't have a long enough range
- Cost
- Costs and that most electrical vehicles do not have the range or reliability to become a useful hackney carriage vehicle there fore the la by introducing more stringent regulations could cause many drivers to leave the trade then causing more unexpected unemployment and hardships
- Also I feel by 2030 electric vehicles will have probably fallen by the wayside due to reliability and cost to the consumer . And possibly replaced by the new kid on the block which is hydrogen
- After covid we are still recovering and we can't all afford new cars
- Large electric vehicle is very expensive.
- Not enough charging points.
- I think is tight already, it's difficult already how it is and new rules won't make life easier. I think all cars have to be euro 6.
- Increased vehicle capital costs and running costs but would help if fares rise accordingly

Respondents were asked, If a policy of licensing lower emission vehicles were to be considered, what type of low emission vehicles would you favour, for licensing as hackney carriages?

Responses were as follows:

Response	Proportion
Electric vehicles only	14%
Petrol hybrid or fully electric vehicles	14%
Petrol or diesel hybrid	44%
Petrol of diesel hybrid or fully electric vehicles.	14%
Plug-in hybrid or fully electric vehicles only	0%
Anything Euro 6 or above.	14%

Respondents were invited to identify benefits which would be associated with licensing the type of vehicles identified. Responses included the following:

- Euro 6 blue tec less emissions than a petrol hybrid and less Road tax
- Cleaner air to breathe especially for the younger peoples future of the planet.
- No benefits at all just a massive government con to get more money out of Taxi Drivers to buy car we can't afford.
- Hybrid is an option that you can rely on milage, where the milage on an electric car may be influenced a lot more by the weather conditions.



Respondents were invited to provide their views of the top three barriers to drivers opting to use lower emission vehicles. In order of descending popularity, the reasons given were:

- Cost
- Range limitations
- Time taken to charge vehicles
- Reliability
- Dangerous in town centres owing to low noise

Respondents were asked to identify the top three benefits of moving to a lower emission vehicle. In order of descending popularity, the benefits identified were:

- Better air quality for the wider community
- Better air quality in the vehicle
- Eligibility for lower emission zones, road tax etc ie on road benefits
- Applying a whole life cost (WLC) analysis often shows that best in class vehicles are cheaper to operate than conventional and older technology vehicles
- Customer demand (customers preferentially select or request low emission vehicles)
- Lower licensing fees
- Eligibility for preferential app membership

Respondents were asked where in the district they predominantly worked. Responses were:

Area	Proportion of respondents
Bishop's Stortford	53%
Hereford & Ware	41%
Puckeridge and surrounding	6%

Respondents were asked if there were any other comments that they would like to make. Responses included the following comments:

- Do more to stop uber
- I would like to see more East Herts taxi marshals out and about catching unlicensed vehicles in our area
- Regarding the insufficient rank space. Please get rid of the unnecessary planters in Fore St. It has been a taxi rank for years it's in the perfect place all the public know where it is and now it's blocked by half a dozen hideous pointless planters that just block the road causing traffic problems. We've lost about 10 rank spaces. Parking is such a problem in Hertford it seems to



me criminal that one side of the road in our busiest street should be blocked off like this. It's madness and there is no logical reason for it. Where else in Hertfordshire has this happened?

- A taxi rank at bishops Stortford train station that is free at source for all licensed East Herts taxis.
- I think that drivers should be allowed to join the licensing committee
- I think not just taxi cars has to be euro 6, but all public transport, in Bishop's Stortford is so many old buses driving and nobody cares.
- Thanks so much for the survey. Obviously we will all be using EV in the next few years but vehicle costs will rise and so fares will have to rise accordingly. That said I believe that most taxi users in East Herts would be prepared to pay
- Perhaps Ranks should have charging points close by for Taxi use only
- On the point of ranks I find that the one in North Street and Riverside is regularly used by non taxi vehicles and they are rarely ticketed by the Wardens.
- Bishop's Stortford Station is a huge problem in evening rush hour
- There really needs to be dedicated taxi wait area to pick up bookings for all taxis not on the Metro rank
- The developer next to the Station has utterly failed to make sensible provision for Taxi, bus and kiss and ride and turning
- Please visit and witness from 6 30PM
- Hope my answers are taken seriously in this survey
- Safety of night drivers and racism is becoming more problematic
- I have more vehicles that I need as a do quite a few schools runs for HCC and need to make sure I have at least one spare in case of break downs etc, I cannot afford to replace 2x euro 5 that I have. They are both private hire vehicle and do not sit on a taxi rank with engines running, they are both looked after nice vehicles and I feel I should not have to replace them, just because I'm told too, I would like to replace when I feel the time is right.
- I also did not agree with limiting the number of hackneys as my business does not do the taxi ranks and I don't use the taxi ranks. However, I want to be able to be hailed down when out and about in the rural area that I mainly work. Now I cannot licence any additional hackney vehicles and recruit more drivers to drive them. I can only go down the road of private hire, which means if people are booking a taxi for a random pickup, they are looking out for a taxi with a roof light, not a private hire car which just blends in with all other cars.



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 cutoff 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 onstreet 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. This coefficient is referred to as the Steady State Performance (SSP) coefficient.

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. This coefficient is referred to as General Incidence of Delay (GID).

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

Periods when schools are not active can lead to more hackney carriage vehicles being available whilst they are not required for school contract work. Such periods can also reduce hackney carriage demand with people away on holiday from the area. Generally, use of hackney carriages is higher in December in the run-up to



Christmas, but much lower in January, February and the parts of July and August when more people are likely to be on holiday. The factor tends to range from 0.8 for December (factoring high demand level impacts down) to 1.2 for January / February (inflating the values from low demand levels upwards).

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

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

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

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

We have calculated a factor for the Incidence of Significant Unmet Taxi Demand (ISUD) using the following standard formula:

 $ISUD = APD \times PF \times SSP \times GID \times SF \times LDF$

where:



ISUD = Incidence of Significant Unmet Demand

APD = Average passenger delay across all time periods

PF = whether the demand is highly peaked. This will equal 1 if there is no peaking and 0.5 if peaking is present

SSP = Steady State Performance - Percentage of weekday daytime hours in which passenger queues are observed

GID = General Incidence of Delay - Proportion of hackney carriage users travelling in hours where average passenger delay exceeds one minute

SF = Seasonality Factor

LDF = Latent Demand Factor. Takes into account trips not made owing to perceived poor quality of service.

Calculation of ISUD variables

APD: Passenger delays occurred primarily during peak demand times. The average delay was determined by calculating the total passenger delay as aggregate passenger delay minutes, then dividing by the total number of passengers, including those who did not suffer any delay.

The Average Passenger Delay was = 1.36 minutes (1 minute 22 seconds).

PF There was a sharp peak in demand across all of the taxi ranks surveyed on Friday and Saturday. Therefore, the PF value is 0.5.

SSP Week day, daytime hours are deemed to be between 10.00 am and 6.00 pm. The proportion of active rank hours when waiting passengers had an average wait of more than one minute is taken at the SSP coefficient. The SSP proportion is 15.0%.

GID The percentage of hackney carriage users travelling in hours where the average passenger delay exceeds one minute was 42.6%.

SF For this study, the rank surveys were undertaken during December. The level of demand was likely to be higher than average, therefore a factor of 0.8 is assumed.

LDF Latent Demand Factor. This is derived from the public attitude survey results and the proportion of passengers observed waiting at the ranks, who gave up waiting before a hackney carriage arrived. It is measured as 1+ proportion giving up waiting. The inclusion of this factor is a response to the latest DfT guidance requiring an estimate of latent demand.



The public consultation survey results indicate that 43.3% of respondents have given up trying to hire a taxi by hailing or at a rank. Therefore, the LDF factor is 1.433.

The ISUD value was calculated as follows, using the variables derived for this study.

 $ISUD = APD \times PF \times SSP \times GID \times SF \times LDF$

ISUD = $1.36 \times 0.5 \times 15.0 \times 42.6 \times 0.8 \times 1.433 = 498.1$

Where the ISUD value is less than 80, it is generally considered to be an indicator that there is no unmet demand which is significant.

Consideration of wider factors

The ISUD value of 498.1 is a strong indication that unmet demand is above a level which would be considered to be significant. However, it is prudent to consider other aspects of the trade in East Herts to determine whether there are any other factors to be taken into account.

There was consistent frustration expressed by members of the public regarding late night availability. This was especially prevalent with respect to hackney carriage availability at Bishop's Stortford railway station.

A significant proportion of passenger waiting occurred at Bishop's Stortford Railway Station rank. This rank is on private land and subject to restriction by concession. As such, access to the rank is not open to all East Herts licensed hackney carriages. It could be argued that passenger waiting is at least in part, due to the constraints limiting access to the ranks by hackney carriages. Hence, any increase in general availability of hackney carriage vehicles would not necessarily increase provision at these restricted ranks. A sensitivity test was undertaken to calculate the ISUD value, excluding the rank at Bishop's Stortford railway station. The ISUD value, across all ranks, but excluding the rank at Bishop's Stortford Railway Station was calculated to be **275.3**. This value is lower than the value calculated for all ranks including Bishop's Stortford station. However, the value is still significantly higher than the value of 80 which is commonly held to be the threshold value to indicate that unmet demand is higher than the level which is significant.



Passenger waiting has been observed at various times throughout the survey period, the level of waiting, compared with the volume of passengers which did not have to wait, was significant. Consequently, we conclude that there **is significant unmet demand**.



8 Summary, synthesis and study conclusions

This hackney carriage Unmet Demand Survey on behalf of East Herts District has been undertaken following the guidance of the BPG and other recent case history regarding unmet demand and its significance.

Vehicles parked on ranks is a significant issue on the ranks on the High Street in Ware, North Street and Riverside in Bishop's Stortford and Fore Street in Hertford in particular. These constraints limit the ability of hackney carriages to attend the ranks and wait on the ranks. Consequently, visibility of available hackney carriages is reduced and the establishment of an active rank in the minds of the travelling public may be diminished.

Pre-booked hire of licensed vehicles in East Herts is the most popular means of hiring a licensed vehicle. Unlike many licensing areas, the number of hackney carriages is higher than the number of private hire vehicles licensed in the area. Perhaps as a consequence of this feature, many pre-booked hires are fulfilled by hackney carriages.

Since the last unmet demand survey was undertaken the number of licensed vehicles and the number of licensed vehicle drivers licensed by East Herts Council has dropped. The capacity of the licensed vehicle fleet to carry passengers is dependent on both the number of licensed vehicles and the number of licensed vehicle drivers.

The number of licensed vehicle drivers currently licensed is lower than in 2019. Anecdotal feedback suggests that some drivers have left the trade, reducing capacity. Licensed vehicle drivers are licensed for 3 years. Some of the inactive drivers may still hold the balance of their 3 year licence and remain on the licensing register. If so, this would provide a false impression of how many drivers are actively driving licensed vehicles.

Hires obtained from taxi ranks form a minor proportion of hires obtained by hackney carriages in East Herts. Taking the total number of hires observed from the rank surveys (2,149) and dividing this by the 203 hackney carriages currently licensed, results in an average of 10.5 hires per vehicle over the 3 days. The existing hackney carriage fleet could not survive purely on rank based hires, with 3 to 4 hires per day.

Feedback from the trade indicates that rank hires account for around a quarter of all hires. The trade feedback information indicated that an average of around 16 hires per day were undertaken by hackney carriage drivers. A quarter of this volume corroborates the average of 3 to 4 rank hires per day.

Not all hackney carriage drivers undertake the same mix of hire types. Some focus more on rank hires and some undertake few or no rank hires.



The level of capacity available at taxi ranks was clearly not sufficient to cater for passenger demand at all times. Occasions when passengers have to wait at taxi rank for hackney carriages to arrive, are normal, even when there is an oversupply of hackney carriages. However, at the taxi ranks in East Herts, there were prolonged periods when passengers had to wait at ranks, both at peak demand times and at other times of day.

Some frustration was expressed by the public regarding lack of availability of licensed vehicles to be pre-booked. It is likely that this has driven some passengers, who would otherwise pre-book a hire, to use the ranks. Consequently, if the level of availability of licensed vehicles for pre-booked hires were to increase, then this would ease demand at the taxi ranks. Similarly, if capacity on private hire circuits were to increase, this would be likely to displace hackney carriages from servicing pre-booked hires towards attending ranks.

This survey is primarily intended to assess whether the level of unmet demand at taxi ranks or through hailing is significant. There were excessive levels of passenger waiting observed at taxi ranks. A quarter of hackney carriage hires were servicing taxi rank demand, which would imply that there is sufficient theoretical capacity for the existing hackney carriage fleet to meet the existing levels of demand. However, current working practices ensured that capacity was deployed on other types of hire. Consequently, the level of passenger waiting was above that which would be considered significant.

There is unmet demand which is significant.



9 Recommendations

On the basis of the evidence gathered in this hackney carriage unmet demand survey for East Herts District, our key conclusion is that there is evidence of unmet demand for the services of hackney carriages both patent and latent which is significant, at this point in time in the East Herts District licensing area.

There are some options which may be considered in order to address the level of unmet demand.

Option 1 – wait for driver numbers and private hire operations to increase, to meet pre-booked hire demand and free hackney carriage capacity to meet demand at the taxi ranks.

Option 2 – increase the number of hackney carriage vehicle licences to enable more hackney carriages to meet demand at taxi ranks.

Option 3 – employ alternative measures to encourage the existing hackney carriage fleet to prioritise rank based demand over pre-booked hire demand, in order to reduce passenger waiting at the taxi ranks.

In order to justify option 1, a robust projection of future increases in driver numbers and private hire provision would be required to make this policy a defensible plan. No projections have been developed and it is unlikely that any such robust projection will be developed in the near future.

Potential measures to promote Option 3 are limited and would have limited 'enforceability'. Such measures would be limited to discussions to encourage hackney carriage operators to prioritise rank service rather than pre-booked hires, in the face of commercial pressures to do otherwise.

Option 2 would be a robust and defensible approach. However, it should be acknowledged that additional vehicles would require additional drivers to operate them. There are no reliable measures which may be implemented to ensure that licensing of additional hackney carriages will result in additional drivers operating them, in the short term. For example, some existing drivers of private hire vehicles or second (non owner) drivers of existing hackney carriages may apply for and operate an additional hackney carriage. Such changes would not effectively add capacity to the fleet, as the same drivers would merely switch to operating a different vehicles at the same times that they would otherwise be working.

Despite potential limitations regarding effectiveness in the short term, **Option 2** is the recommended option for implementation. Measures would take time to become effective. Over time, option 2 would be the most effective option as this would provide the greatest opportunity to encourage new drivers into the trade to take up opportunities as additional drivers of existing licensed vehicles or to take up a new hackney carriage licence. A relatively small increase in provision would make



a significant difference to the level of passenger waiting at ranks. Around 5% increase (10 hackney carriages) would be assumed to result in a commensurate increase of 5% in capacity, during both peak and off peak periods. This level of increase would not fully eliminate all peak period passenger waiting on Friday and Saturday nights, but would bring down unmet demand to a level below that which is significant, whilst maintaining the operational viability of hackney carriages at other times during the week.

