

# THURROCK COUNCIL

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## TAXI UNMET DEMAND STUDY



September 2010

**TPI**

THE TRANSPORTATION CONSULTANCY

**THURROCK COUNCIL  
TAXI UNMET DEMAND SURVEY**

**FINAL REPORT**

**September 2010**

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## 1.0 CONTEXT OF THE STUDY

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### The licensing framework

- 1.1 Hackney Carriages can ply for hire in the street, at ranks or stands and may take bookings over the telephone. Private Hire Vehicles (PHVs) must be pre-booked through a private hire operator and cannot be hailed in the street or from a rank. The phrase taxi where used in this report refers to both Hackney Carriage and Private Hire Vehicles. In some places the term cab is substituted for Hackney Carriage.
- 1.2 Taxi operating structures can often include:
- Independent (often sole trader) owner drivers who only operate for between 8 and 12 hours a day, at times and on days of their choosing;
  - 'Independents' who share their vehicle with one or occasionally more other licensed drivers, who do not have a vehicle of their own, meaning the one vehicle can be available up to 24 hours a day, 7 days a week;
  - Radio circuits, taking bookings up to 24 hours a day, which they pass on to self employed drivers that sign up to the circuit or sometimes drivers that join as a shareholder, where the circuit operates as a co-operative. The times drivers operate relate to the demands on the circuit. It's also possible that some drivers are members of more than 1 radio circuit;
  - Limited companies operating either Hackney Carriage, PHV based services or both using their own vehicles and employing drivers to operate them on their behalf, for between 16 and 24 hours a day.
- 1.3 Thurrock Council is the licensing authority for Hackney Carriage and private hire operators, drivers and vehicles within their area. They are able to specify the standards they require (over and above the legal minimum) for operators, drivers and vehicles, set Hackney carriage fares and in certain circumstances, can choose to regulate the number of Hackney Carriage licences they issue. There are just over two thirds of licensing authorities in England that do not regulate Hackney licences and just under a third that do. Thurrock are currently one of the authorities that choose to limit the Hackney licences they make available.
- 1.4 Current guidance to licensing authorities was issued by the Department for Transport (DfT) in May 2010 (see Appendix 1). This highlights that DfT regard not imposing quantity restrictions on licences as good practice. However, it also states that the grant of a taxi licence may be refused, for the purpose of limiting the number of licensed hackneys available if the licensing authority is satisfied that there is no significant demand for the services of hackney carriages within the area to which the licence would apply, which is unmet. The DfT's position was first outlined in guidance issued in 2004 following a report in 2003 by the Office of Fair Trading (OFT) that looked at the impacts of the regulatory framework on Hackney Carriage and PHV services in the UK and recommended deregulation of the Hackney sector for its consumer benefits.
- 1.5 The current DfT guidance does not seek to cover the whole range of possible licensing requirements. Instead it concentrates on those issues that have caused difficulty in the past or that are considered of particular significance. In relation to

unmet demand it specifies the need for both quantitative and qualitative analysis to be undertaken, ahead of considering any significant change in licensing rules.

- 1.6 The most recent guidance follows a further OFT report, published in 2007, that looked at the impact of their 2003 study and suggested that it had led to an increase in those authorities that had deregulated. It noted that in these circumstances additional Hackneys normally arise from PHV operators/drivers transferring to Hackney operation, meaning the overall size of the taxi fleet often remains the same. It also found that where fare controls are maintained, alongside deregulation, costs to the passenger also increase. To address this and any excess entry that results from deregulation, OFT suggested fares should be set as a maximum, rather than a fixed rate and passengers should be encouraged to negotiate.

### **Accessibility**

- 1.7 The Disability Discrimination Act (DDA) 2005 amended the DDA 1995 to enable the Government to lift the exemption for public transport services, including taxis and PHVs. The regulations came into force on 4 December 2006 and since then licensing authorities and taxi operators are required to review any practices, policies and procedures that make it impossible or unreasonably difficult for a disabled person to use such services. However, the amendment allowed for the exemption on vehicles to be lifted for different services, at different times and to different extents. The DDA 2005 has subsequently been incorporated into the Single Equalities Bill 2010. This has recently completed its passage through parliament and government announced in July their intention to implement the first wave of the Equality Act on 1 October. However, this does not include provisions about taxi accessibility contained in section 11 of the Bill. Government has said Ministers are considering how to implement this provision in the best way for business and for others with rights and responsibilities under the Act and will announce their proposals in due course.

#### *DDA, Part 5 – Access to Vehicles*

- 1.8 The DfT, in 2009, consulted on proposals to require vehicles used as taxis to be accessible to disabled people. In the consultation they suggested Hackneys could be divided into two types; accessible vehicles, suitable for carrying most disabled people, including people that travelled in a 'standard' wheelchair and fully accessible vehicles suitable for carrying any disabled person, including those using scooters, electric and other large or non standard wheelchairs. They also noted that a vehicle suitable for the latter category was not currently available in the UK. The results of the consultation have been published but were not conclusive and the government at the time decided they would seek 3 demonstration projects to examine the position further. However, to date, no pilot studies have been established and it is not yet clear if the new government will proceed with this approach.
- 1.9 In their most recent guidance to licensing officers, issued in March 2010, the Department for Transport (DfT) state that they will be "taking forward demonstration schemes in three local authority areas to research the needs of people with disabilities in order to produce guidance on the most appropriate provision." In addition DfT state that they recognise, in the meantime, licensing authorities will want to make progress on enhancing accessible taxi provision and to this end highlight a number of considerations:
  - That different accessibility considerations apply between taxis and PHVs and in this context, it is important that a disabled person should be able to hire a taxi on the

spot with the minimum delay or inconvenience, and having accessible taxis available helps to make that possible;

- That for PHVs, it may be more appropriate for a local authority to license any type of saloon car, noting that some PHV operators offer accessible vehicles in their fleet
- That licensing authorities should do what they can to work with operators, drivers and trade bodies to improve drivers' awareness of the needs of disabled people, perhaps by encouraging them to undertake disability awareness training;
- That section 36 of the Disability Discrimination Act 1995 (DDA) requiring drivers to provide assistance to people in wheelchairs, to carry them in safety and not to charge extra for doing so was commenced for drivers of taxibuses (**only**) by enactment of the Local Transport Act 2008;
- That local authorities can take action against non-taxibus drivers who do not abide by their duties under section 36 of the DDA by, for example, using license conditions to implement training requirements or, ultimately, powers to suspend or revoke licenses;
- That the Equality Act would extend the duties under section 36 of the DDA to drivers of taxis and PHVs whilst operating conventional taxi services using wheelchair accessible vehicles.

- 1.10 Prior to this the Department's letter to local licensing authorities of 9 September 2002, the relevant part of which was repeated in the letter of 16 June 2004, gave more detailed guidance. Specifically, that there was recognition that in the less densely populated areas a requirement for an entirely wheelchair accessible Hackney fleet could impact on the marginal economics of operation. However, it was considered that this should not be the case in the major urban areas and these could therefore be expected to seek to achieve this overtime. As a result in October 2003 the Department indicated a phased introduction over 10 years starting with a phase 1 list of named urban areas. This list included Thurrock. The most recent DfT advice on what is required to make a taxi accessible is included in Appendix 2.

#### *DDA Part 3 – Access to services*

- 1.11 Part 3 of the Disability Discrimination Act places a legal duty on all service providers in Britain to make 'reasonable adjustments' to ensure that people are not prevented from using their services because they have a disability. It does not matter whether the services in question are being provided by a sole operator, firm, company or other organisation, or whether the person involved in providing the services is self-employed or an employee, volunteer, contractor or agent. When deciding whether an adjustment is reasonable, service providers can consider issues such as the cost of the adjustment, the practicality of making it, health and safety factors, the size of the organisation, and whether it will achieve the desired effect. All transport providers and authorities have duties, for example, in relation to timetables, websites and infrastructure. Operators are obliged to make reasonable adjustments in the way they deliver their services to remove any barriers for disabled passengers, depending on the type of vehicles and the services they offer to the public. Public authorities have an additional duty to actively promote equality (rather than simply avoid discrimination).
- 1.12 The duty is 'anticipatory'; i.e. transport providers should expect that people with accessibility problems, such as disabled people, will be using their vehicles. They should consider what adjustments might be needed and put the necessary arrangements in place without waiting to be asked. However, they are not required to take any steps which would fundamentally alter the nature of their service, operation, trade, profession or business or where a change may compromise someone's health

or safety. Part 3 of the Disability Discrimination Act requires transport providers to take reasonable steps to:

- Change a policy, practice or procedure which makes it impossible or very difficult for a disabled person to get on or off a vehicle, or to use any services on the vehicle (for example, a buffet car),
- Provide extra help or information to a disabled person so that they can get on, travel on and get off a vehicle or use any services on the vehicle.

#### *Guide Dogs*

- 1.13 In addition, since 31 March 2001 licensed taxi drivers in England and Wales have had a duty under s.37 of the Disability Discrimination Act 1995 to carry guide, hearing and other prescribed assistance dogs in their taxis, without additional charge. Drivers who have a medical condition that is aggravated by exposure to dogs may apply to their licensing authority for exemption from the duty on medical grounds. Any other driver who fails to comply with the duty is guilty of a criminal offence and liable, on summary conviction, to a fine of up to £1,000. Similar duties covering PHV operators and drivers came into force on the 31st March 2004. Enforcement of the duties is the responsibility of local licensing authorities.

#### *Guidance and Training*

- 1.14 The Equality and Human Rights Commission (formerly the Disability Rights Commission) has produced a Code of Practice to explain the DDA Part 3 duties for the transport industry in detail. The duties under Part 3 demand new skills and the government have worked with GoSkills to develop NVQ training for the taxi and PHV industries. There is also the Taxi Driver licence available as developed by the Driving Standards Agency and some licensing authorities have encouraged drivers to undertake Passenger Assistance Training Scheme (PATS), developed by the Community Transport Association.

#### *Equalities Bill*

- 1.15 The proposed Single Equalities Act 2010 draws together a wide range of equality legislation, including the DDA 2005, into a single Act. The Single Equalities Bill outlines the likely content and a Code of Practice has also been drawn up by the Equality and Human Rights Commission. The overall measures in the Bill include:
- Introducing a new public sector duty to consider reducing socio-economic inequalities;
  - Putting a new Equality Duty on public bodies;
  - Using public procurement to improve equality;
  - Banning age discrimination outside the workplace;
  - Introducing gender pay reports in 2013 if employers with over 250 employees do not take action by then;
  - Extending the scope to use positive action;
  - Strengthening the powers of employment tribunals;
  - Protecting carers from discrimination;
  - Offering new mothers stronger protection when breastfeeding;
  - Banning discrimination in private clubs, and
  - Strengthening protection from discrimination for disabled people.
- 1.16 The specific proposals for Taxis (which the new government are in the process of considering) are outlined in section 12, chapter 1 of the Bill. For the most part these

proposals reflect the current legislation as contained in the DDA 2005 and originate from DDA 1995. Clause 159 provides powers for the Secretary of State to make regulations specifying the technical standards applying to licensed taxis and to impose requirements on taxi drivers, to enable disabled people to access taxis safely, even when seated in a wheelchair, and be carried in safety and reasonable comfort. It also makes it an offence, punishable by a fine of up to £1,000, for a driver of a regulated taxi to fail to comply with the requirements of the regulations.

- 1.17 The powers provide for the Secretary of State to make regulations to enable disabled people:
- to get into and out of taxis in safety;
  - to do so while in wheelchairs;
  - to travel in taxis in safety and reasonable comfort; and
  - to do so while in wheelchairs.
- 1.18 The regulations are likely, in particular, to require a regulated taxi to conform with provision as to:
- the size of a door opening for the use of passengers;
  - the floor area of the passenger compartment;
  - the amount of headroom in the passenger compartment;
  - the fitting of restraining devices designed to ensure the stability of a wheelchair while the taxi is moving.
- 1.19 They may also:
- require the driver of a regulated taxi which is plying for hire, or which has been hired, to comply with provisions as to the carrying of ramps or other devices designed to facilitate the loading and unloading of wheelchairs;
  - require the driver of a regulated taxi in which a disabled person is being carried while in a wheelchair to comply with provisions as to the position in which the wheelchair is to be secured.
- 1.20 The Bill provides for a licensing authority to seek an exemption to the regulations where they can demonstrate that the adoption of them will reduce the number of taxis operating to an unacceptable level. Where an exemption is granted the Secretary of State may still place conditions on this; for example that all taxis must be fitted with a swivel seat.
- 1.21 In addition to clause 159 and other clauses adopting DDA part 3 access to transport services an amendment to the Bill by the House of Lords (clause 160) provides for an exception to Section 16 of the Transport Act 1985 (which modifies the provisions of the Town Police Clauses Act 1847 about hackney carriages to allow a license to ply for hire to be refused in order to limit the number of licensed carriages). This will require a license to be issued for a 'wheelchair accessible' taxi regardless of any limit imposed, where the proportion of 'wheelchair accessible' licenses is less than any proportion that is prescribed by the Secretary of State. If government do proceed with implementing the section on taxis in the Bill and the Secretary of State sets a proportion for wheelchair accessible taxis that is greater than that currently in place in Thurrock this clause could have the effect of removing the ability of the licensing authority to limit hackney numbers until that proportion is reached.
- 1.22 Within the Bill a taxi is defined as a vehicle which is licensed under section 37 of the Town Police Clauses Act 1847 or section 6 of the Metropolitan Public Carriage Act 1869 (i.e. a hackney carriage). There is no accessibility regulation of Private Hire Vehicles (PHV) proposed in the Bill, except where these are operating under franchise or as a taxi bus. However, it's possible they may be brought into the



regulatory framework at a later date. It is also the case that the Local Government (Miscellaneous Provisions) Act 1976, the regulatory framework for PHV licensing, provides for licensing authorities to attach conditions “as they may consider reasonably necessary” to either a PHV vehicle or operators licence. This can include conditions relating to vehicle accessibility.

### **The Taxi Market**

- 1.23 The OfT research shows that on average in England and Wales people make 12 trips by taxi per year, and that this is one of the fastest growing transport sectors in UK in recent years. Considerable research has been done both at the local and national level, and it is understood that the level of Hackney Carriage and PHV use is inversely related to income with those on low income making most trips. For example, the disabled make 67% more trips than average and households without a car make on average 30 trips p.a. compared to only 9 taxi trips for those with a car.
- 1.24 Use of taxis is concentrated around the morning peak and late evenings, with 21% of all trips being made on Saturdays. Nationally, almost a third of taxi trips are made from a rank, the majority are pre booked.
- 1.25 Markets typically targeted by Hackneys include:
- Public, private and unofficial ranks;
  - Flag down/on-street;
  - Contract work for statutory authorities such as for education authorities or social services;
  - Commercial contract work;
  - One off/occasional private hire for individuals or organisations;
  - Evening leisure;
  - Daytime shopping/social/business;
  - Tourism
  - Various combinations of the above that ‘fit together’ in time
- 1.26 In some areas almost all of the trade may focus on one particular aspect of the market at the same time (i.e. school contracts) causing there to be unmet demands in other parts of the market at that time.
- 1.27 The market for taxis – both Private Hire Vehicles and Hackneys is therefore influenced by many factors – both on the demand and the supply side. Demand for example is influenced by the overall population, the extent of car ownership, availability of other transport including public, community and private transport, levels of mobility impairment and disability. Seasonality, the extent and hours of the night time economy will affect demand. The market will also be influenced by the supply of Hackney and PHVs, in terms of the quality, affordability and quantity of provision – both perceived and actual.
- 1.28 It is therefore essential that any unmet demand, identified by surveys and consultation, is considered in the light of the capacity of both Hackney and PHV provision for the area. While it should not be the focus of the study, there is also a need to consider unmet demand in the wider context of demand for passenger transport in general and the optimum mix of all modes (bus, rail, community transport, etc and Hackney/PHV) required to respond to this. Vehicle counts alone are not adequate as there is a need to recognise that operations are structured in different ways and this has an impact on the times vehicles are available and which aspects of the market they are targeted towards.

## **Significant Unmet Demand for Hackneys**

- 1.29 Over the last twenty years the need to monitor demand conditions has led to the commissioning of research into the performance of markets by many authorities. Where authorities choose to restrict the number of hackney licences they issue as a result of this research they are required to publish and justify their reasons for restricting the number of licences issued. Each authority maintaining quantity restrictions is also expected to review their local case for such restrictions at least every three years.
- 1.30 In effect, restrictions should only be put in place where there are particular local conditions thought to warrant this, there is demonstrably clear benefit for the consumer, and councils can publicly justify their reasons for the restriction and how decisions on numbers have been reached. Based on their research Councils can therefore choose to:
- Issue a licence to any applicant meeting their local application criteria;
  - Grant at least such number of licences as they consider necessary to ensure there is no significant unmet demand; or
  - Refuse to grant additional licences; provided they are satisfied there is no significant unmet demand.
- 1.31 The Court of Appeal has provided an indication of the way in which an authority should interpret whether there is unmet demand. In the case of *R v Transport Committee Great Yarmouth Borough Council ex parte Sawyer* ILR 14.01.87 it was determined that an authority is entitled to consider the situation in relation to the authority as a whole and also from a temporal view as a whole – so that it does not have to take into detailed consideration what may be the position regarding unmet demand at each particular time of the day. In effect, this accepts there will be some peaks in demand at certain ranks but that the authority can consider the situation taken as a whole throughout the day and across its area.
- 1.32 Reflecting changing guidance, the term unmet is assumed to have a wider application than simply representing those passengers who seek a Hackney on street and are unsuccessful. This requires the application of a number of measures for identifying unmet demand including not only the waiting times of those passengers actually served, but also the absence of a Hackney in the street, or the absence of one at a rank when a passenger arrives. In addition, to determine whether this is significant unmet demand, DfT's current guidance requires local authorities to consult with the general public, those working in the market, consumer and passenger (including disabled) groups, groups which represent passengers with special needs, the police, transport stakeholders (e.g. rail/bus/coach providers, traffic managers, etc), the commercial sector and other stakeholders.

## **Objectives and Methodology for this Study**

- 1.33 Thurrock Council are seeking a taxi unmet demand study, in line with DfT guidance. The study is required to assess current demand and any significant unmet demand (including latent demand) in order to inform the Councils consideration of its approach to Hackney licensing in Thurrock. In addition the study is required to inform the Council of the implications of the licensing choices available to it for addressing the demand that exists, in the context of the demand for taxis as a whole.
- 1.34 TPi understands the main objectives of the study are:

- To provide the Council with clear evidence of whether or not there is any significant unmet demand, including latent demand, for Hackney Carriages in the Borough
- To derive from this, the optimal number of licensed vehicles sufficient to secure an adequate service for all aspects of the taxi market
- To make specific recommendations on the number of taxis required to meet any unmet demand identified
- To provide unambiguous conclusions and clear recommendations on measures to alleviate any unmet demand found
- To take account of Government Guidance and the 2003 OFT report
- To give proper regard to the provisions proposed in the Equality Bill to amend S.16 of the Transport Act 1985 in so far as this will be likely to affect taxi services.
- To provide a narrative report on the predicted effects of delimitation
- To provide a comprehensive report on the available information and research carried out

1.35 The study has used a range of research to establish whether there is unmet demand for taxi provision within Thurrock, including:

- **Review of relevant policies, standards etc:** to understand the authority's aspirations for meeting travel needs and social inclusion and provide context to determining overall demand for travel and how this should be met;
- **Extensive rank observations and audits:** examination of all the ranks in the Authority, including monitoring passengers' waiting time, any illegal plying for hire, use of Hackney Carriages by wheelchair users and rank audits;
- **On street interviews:** a survey of a number of people on street to obtain information about their understanding of the sector, their last taxi journey, their overall levels of taxi use, about quality and barriers to use.
- **Consultation:** including consultation with all relevant stakeholders
- **Benchmarking against other authorities:** to provide a useful comparison as to the quantity and quality criteria used for taxis and Private Hire Vehicles.

## 2.0 BACKGROUND

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- 2.1 Thurrock is located on the north bank of the river Thames, about 25 miles east of London, covering the parishes of Aveley, Bulphan, Chadwell (St Mary), Corringham, East Tilbury, Fobbing, Grays Thurrock, Horndon, Langdon Hills, Little Thurrock, Mucking, Orsett, South Ockendon, Stanford-le-Hope, Stifford, West Thurrock and West Tilbury.
- 2.2 Despite much of the borough being protected Green Belt land, Thurrock provides localised opportunities for further industrial and commercial development. The borough forms part of the Thames Gateway regeneration area, a corridor of opportunity that has been identified by central government as the area with greatest development and commercial potential in the country. A new container port (DP World) is under construction at Shallhaven. This is likely to have substantial impact on transport provision in the district in years to come.
- 2.3 Thurrock has a population of 150,000 living in 63,500 homes. There are 12% and 17% of the population respectively in the age groups found to make the greatest use of taxis nationally, those aged 15 to 24 and those over 60 years old.
- 2.4 People with a limiting long term illness make up 16% of the population, in line with the national average. There are 21.3% of households that have no access to a car or van, compared to the national average of 26.8%.

### **The Taxi Trade in Thurrock**

- 2.5 Thurrock Council practices a policy of 'quantity control' by limiting the number of hackney carriage licenses it grants. The maximum number of available Hackney Carriage plates is presently 100, with all of these licenses currently in use. Of this number approx 20% are wheelchair accessible vehicles.
- 2.6 There are currently (as of February 2010) 169 dual licensed drivers with 227 private hire drivers. The Private Hire market is much more volatile than the Hackney Carriage market, with a relatively high volume of change over of licences each year.
- 2.7 The last survey of unmet demand was carried out in 2006. Both this and the survey prior to it did not detect any unmet demand. However, since 2006, it was decided to issue two new licenses each year.
- 2.8 In order to assist the Council with their decision making and to robustly ascertain the current level of demand for taxis in general and hackneys in particular they are seeking a taxi survey, in line with the current guidance of the Department for Transport. The study should provide a comprehensive review of current demand and identify any significant unmet demand (including latent demand) to provide the Council with the evidence needed to formulate future taxi policy, in the best interests of customers.

### **Hackney Ranks**

- 2.9 The table below summarises details of the official Ranks for Hackney Carriages in Thurrock. Rank locations are illustrated in Appendix 4.

<b>Rank Number</b>	<b>Rank Location</b>	<b>Spaces</b>
1	Crown Road, Grays	8
2	High Street, Aveley	2
3	Daiglen Drive, South Ockendon	2
4	Kings Street, Stanford le Hope	2
5	St. John's Way, Corringham	2
6	Dock Road, Tilbury	2
7	Clarence Road / Cart Lane, Grays	8
8	Lakeside Shopping Centre, Thurrock	6
9	Stanford le Hope Railway Station	1
10	Chafford Hundred Railway Station	7

*Source: Thurrock Council*

### 3.0 RANK OBSERVATIONS

#### Rank Observation Survey

- 3.1 The rank observation programme covered a period of 154 hours spread across 10 official hackney carriage ranks considered by the Council to be those currently used by the trade. The observations were conducted between and May and June 2010. The timing of the rank observations was chosen to ensure that they were undertaken during the school term, to provide a mix of weekend and weekday observations and to be representative of a typical week.
- 3.2 Observations were carried out as detailed in Table 3.1. The hours allocated to each rank were based upon a detailed site visit and discussions between TPi staff and the Client.

**Table 3.1 Allocation of Formal Rank Observations**

Rank Location	Hours Observed
Crown Road, Grays	26
High Street, Aveley	12
Daiglen Drive, South Ockendon	12
Kings Street, Stanford le Hope	12
St. John's Way, Corringham	12
Dock Road, Tilbury	12
Clarence Road / Cart Lane, Grays	18
Lakeside Shopping Centre, Thurrock	12
Stanford le Hope Railway Station	18
Chafford Hundred Railway Station	20
<b>Grand Total</b>	<b>154</b>

Source: TPi

- 3.3 Rank observations were undertaken at all ranks and for every five minute period, the number of Hackneys departing and the number of passengers departing was observed and recorded. At the end of each five minute period, the queue lengths of Hackneys and passengers were also recorded. For each hour the mean delay can then be estimated as being the queue length divided by the throughput per five minute period, multiplied by five minutes. Thus:

$$MeanDelay = \frac{QueueLength}{Throughput} \times RecordingPeriod$$

- 3.4 This method relies on compiling "representative weeks" of activity at each major rank and then using these to estimate overall passenger and Hackney delays and loading. The method has been tried and tested in many previous studies and provides

consistent estimates within the bounds expected for passenger delay. In cases where long Hackney queues coincide with small levels of Hackney throughput the method tends to overestimate delays.

- 3.5 In constructing a representative profile of demand at a rank over the period of a week a number of assumptions are made. Firstly, 'daytime' observations refer to observations made between 0700 and 1800 hours and 'night-time' observations refer to the remaining period of the day. Secondly, observations conducted between Monday and Friday daytime and Monday to Thursday night-time are regarded as similar and therefore referred to as typical weekday observations. Observations conducted on Friday and Saturday night-times and Saturday daytimes are all likewise similar and referred to as typical weekend observations, with Sunday treated separately, based on experience from other studies. These periods are then factored up to provide complete weekly totals.
- 3.6 The results presented in this section set out:
- **The Balance of Supply and Demand.** This indicates the proportion of the time that the market exhibits excess demand, equilibrium and excess supply;
  - **Average Delays and Total Demand.** This indicates the overall level of passenger and Hackney delay and provides estimates of total demand;
  - **The Demand Profile.** This provides the key information required to determine the pattern of demand; and
  - **The Effective Supply of Vehicles.** This indicates the proportion of the fleet that was off/on the road during the survey.

### The Balance of Supply and Demand

- 3.7 The first indicator of the performance of the Hackney trade can be gauged from a general assessment of the market conditions. This is assessed in terms of three broad areas: excess demand, equilibrium and excess supply. If the minimum Hackney queue occurring during one hour was greater than two vehicles the market is considered to be in excess supply in that hour, that is, there were always ample Hackneys to meet the observed level of demand. If the maximum passenger queue exceeded two in an hour then the market is considered to be exhibiting excess demand in that hour, that is, there was at least one occasion during that hour in which the observed level of demand could not be met without passenger delay occurring. If the maximum passenger queue is below three and/or the minimum Hackney queue is less than three then the market is considered to be in equilibrium in that hour, that is, there was broadly speaking just sufficient supply to meet the observed level of demand. The results of the analysis are presented in Table 3.2.

**Table 3.2 The Balance of Supply and Demand in the Thurrock Rank-Based Hackney Carriage Market (Rows Sum to 100%)**

Period		Excess Demand (%)	Equilibrium (%)	Excess Supply (%)
Weekday	Day	0.0	87.5	12.5
	Night	0.0	83.3	16.7
Weekend	Day	7.1	69.0	23.8
	Night	7.1	85.7	7.1
ALL (including Sundays)		4.17	81.25	14.58

Source: TPI

- 3.8 Table 3.2 shows that, overall, the market exhibits equilibrium conditions in almost 81.37% of hours, the predominant market state. Excess Demand is observed, on average, in 4.17% of hours, while excess supply is experienced in 14.58% of hours.
- 3.9 Conditions are worst for the market during the weekend day and night time and at their best during weekday day and night time.
- 3.10 During weekday daytimes the proportion of hours exhibiting excess demand is 0.0%. This is an important element in the consideration of significant unmet demand.

### **Average Delays and Total Demand**

- 3.11 The rank observation programme was designed to allow estimates of a week's activity at each rank. To observe each rank for a complete week would have been costly and unnecessary. Instead the week was divided up into periods and observations designed to sample from these. The periods are "daytime" i.e. 0700-1800, "Night-time" i.e. 1800-0200, "Weekday" (i.e. Monday to Friday 'daytime' and Monday to Thursday 'night-time'), "Weekend" (i.e. Friday 'night-time' and Saturday), and Sunday (not always surveyed), which is treated in isolation.
- 3.12 Using this method the following estimates of average delays and throughput were produced for each of the main ranks in the licensing area as shown in Table 3.3.

**Table 3.3 Total Demand and Average Delays in minutes (estimates per week)**

<b>Rank</b>	<b>Passenger Departures</b>	<b>Hackney Departures</b>	<b>Average Passenger Delay</b>	<b>Average Hackney Delay</b>
Crown Road, Grays	448	429	0.33	98.82
High Street, Aveley	0	8	0	5
Daiglen Drive, South Ockendon	0	0	0	0
Kings Street, Stanford le Hope	31	229	0	0
St. John's Way, Corringham	49	114	5	16.84
Dock Road, Tilbury	15	132	0	16.86
Clarence Road / Cart Lane, Grays	293	251	0	30.89
Lakeside Shopping Centre, Thurrock	522	259	0	0
Stanford le Hope Railway Station	130	166	1.69	10.18
Chafford Hundred Railway Station	255	247	0.48	30.38



<b>Totals</b>	<b>1743</b>	<b>1835</b>	<b>-</b>	<b>-</b>
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Source: TPI

- 3.12 Table 3.3 shows that the busiest rank with respect to passenger departures is Lakeside Shopping Centre, Thurrock but for Hackney departures is the Crown Road, Grays rank. Lakeside Shopping Centre, Thurrock rank is the second busiest rank for Hackney departures. This appears to result from most journeys from Crown Road being for a single individual, whereas those from Lakeside are for more than one person. The cab delay at Crown Road, of over one and a half hours, is notably greater than for any other rank.
- 3.13 The average delays and total demands in the above table are calculated as follows, using Crown Road, Grays as an example.

**Table 3.4 Rank Observations undertaken at the Crown Road**

Rank Name : Rank 1 Day:Thursday Date: 6/5 Time: 10.00 - 18.00

Hourly Time Period	Passenger & Cab Rank		Hourly Queue Totals		Service Performance		Max <sup>m</sup> & Min <sup>m</sup> Queues		Balance of Supply & Demand			>0	> or = 1 Min	> or = 5 Min
	Passenger Throughput	Cab Throughput	Passenger Queue	Cab Queue	Average Passenger Delay	Average Cab Delay	Maximum Passenger Queue	Minimum Cab Queue	Excess Demand	Equilibrium	Excess Supply			
10-11	9	6	0	110	0.00	91.67	0	4	0	0	1	FALSE	FALSE	FALSE
11-12	2	2	0	117	0.00	292.50	0	6	0	0	1	FALSE	FALSE	FALSE
12-13	5	4	0	91	0.00	113.75	0	6	0	0	1	FALSE	FALSE	FALSE
13-14	2	2	0	98	0.00	245.00	0	5	0	0	1	FALSE	FALSE	FALSE
14-15	4	4	0	95	0.00	118.75	0	5	0	0	1	FALSE	FALSE	FALSE
15-16	6	6	3	50	2.50	41.67	1	3	0	0	1	6	6	FALSE
16-17	4	3	0	26	0.00	43.33	0	0	0	1	0	FALSE	FALSE	FALSE
17-18	4	3	0	55	0.00	91.67	0	0	0	1	0	FALSE	FALSE	FALSE
<b>Total</b>	<b>36</b>	<b>30</b>	<b>3</b>	<b>642</b>	<b>0.42</b>	<b>107.00</b>	<b>1</b>	<b>29</b>	<b>0</b>	<b>2</b>	<b>6</b>	<b>6</b>	<b>6</b>	<b>0</b>

Rank Name : Rank 1 Day: Tue Date: 4/5/10 Time: 23:00-

Hourly Time Period	Passenger & Cab Rank		Hourly Queue Totals		Service Performance		Max <sup>m</sup> & Min <sup>m</sup> Queues		Balance of Supply & Demand			>0	> or = 1 Min	> or = 5 Min
	Passenger Throughput	Cab Throughput	Passenger Queue	Cab Queue	Average Passenger Delay	Average Cab Delay	Maximum Passenger Queue	Minimum Cab Queue	Excess Demand	Equilibrium	Excess Supply			
23-00	5	4	0	95	0.00	118.75	0	7	0	0	1	FALSE	FALSE	FALSE
00-01	4	7	0	88	0.00	62.86	0	6	0	0	1	FALSE	FALSE	FALSE
01-02	2	6	0	2	0.00	1.67	0	0	0	1	0	FALSE	FALSE	FALSE
02-03	0	0	0	0	0.00	0.00	0	0	0	1	0	FALSE	FALSE	FALSE
<b>Total</b>	<b>11</b>	<b>17</b>	<b>0</b>	<b>185</b>	<b>0.00</b>	<b>54.41</b>	<b>0</b>	<b>13</b>	<b>0</b>	<b>2</b>	<b>2</b>	<b>0</b>	<b>0</b>	<b>0</b>

Rank Name : Rank 1 Day: Saturday Date: 15/5 Time: 10.00-18.00

Hourly Time Period	Passenger & Cab Rank		Hourly Queue Totals		Service Performance		Max <sup>m</sup> & Min <sup>m</sup> Queues		Balance of Supply & Demand			>0	> or = 1 Min	> or = 5 Min
	Passenger Throughput	Cab Throughput	Passenger Queue	Cab Queue	Average Passenger Delay	Average Cab Delay	Maximum Passenger Queue	Minimum Cab Queue	Excess Demand	Equilibrium	Excess Supply			
10-11	1	1	1	0	5.00	0.00	1	0	0	1	0	1	1	1
11-12	1	2	0	14	0.00	35.00	0	1	0	1	0	FALSE	FALSE	FALSE
12-13	8	6	5	5	3.13	4.17	2	0	0	1	0	8	8	FALSE
13-14	0	0	0	6	0.00	0.00	0	1	0	1	0	FALSE	FALSE	FALSE
14-15	0	0	0	6	0.00	0.00	0	0	0	1	0	FALSE	FALSE	FALSE
15-16	3	5	1	16	1.67	16.00	1	0	0	1	0	3	3	FALSE
16-17	0	0	0	1	0.00	0.00	0	0	0	1	0	FALSE	FALSE	FALSE
17-18	0	1	0	9	0.00	45.00	0	0	0	1	0	FALSE	FALSE	FALSE
<b>Total</b>	<b>13</b>	<b>15</b>	<b>7</b>	<b>57</b>	<b>2.69</b>	<b>19.00</b>	<b>4</b>	<b>2</b>	<b>0</b>	<b>8</b>	<b>0</b>	<b>12</b>	<b>12</b>	<b>1</b>

Rank Name : Rank 1 Day: Fri Date: 7/5 Time: 20:00-02:00

Hourly Time Period	Passenger & Cab Rank		Hourly Queue Totals		Service Performance		Max <sup>m</sup> & Min <sup>m</sup> Queues		Balance of Supply & Demand			>0	> or = 1 Min	> or = 5 Min
	Passenger Throughput	Cab Throughput	Passenger Queue	Cab Queue	Average Passenger Delay	Average Cab Delay	Maximum Passenger Queue	Minimum Cab Queue	Excess Demand	Equilibrium	Excess Supply			
20-21	4	2	0	99	0.00	247.50	0	7	0	0	1	FALSE	FALSE	FALSE
21-22	3	3	0	103	0.00	171.67	0	7	0	0	1	FALSE	FALSE	FALSE
22-23	7	4	0	106	0.00	132.50	0	7	0	0	1	FALSE	FALSE	FALSE
23-00	4	3	0	162	0.00	270.00	0	12	0	0	1	FALSE	FALSE	FALSE
00-01	6	4	0	165	0.00	206.25	0	12	0	0	1	FALSE	FALSE	FALSE
01-02	5	4	0	165	0.00	206.25	0	12	0	0	1	FALSE	FALSE	FALSE
<b>Total</b>	<b>29</b>	<b>20</b>	<b>0</b>	<b>800</b>	<b>0.00</b>	<b>200.00</b>	<b>0</b>	<b>57</b>	<b>0</b>	<b>0</b>	<b>6</b>	<b>0</b>	<b>0</b>	<b>0</b>

3.14 The totals for each survey above can be summarised as follows in Table 3.5:

**Table 3.5 Summary of Rank Observations undertaken at Crown Road**

		Number of Hours	Total Passengers	Average Passenger Delay	Total Hackneys	Average Hackney Delay
Mon-Fri	DAY	8	54	0.42	45	107
Mon-Thu	NIGHT	4	22	0	34	54.41
Sat Day	DAY	8	13	2.69	15	19
Fri-Sat	NIGHT	6	38.67	0	26.67	200
			<b>Est. Weekly Passengers 448</b>		<b>Est. Weekly Hackneys 429</b>	
<b>Overall Weighted Average Passenger Delay</b>						<b>0.33</b>
<b>Overall Weighted Average Hackney Delay</b>						<b>98.82</b>

3.15 The estimated number of weekly passengers are calculated as follows:

54X (5 Days)	=	270
22 X (4 Nights)	=	88
13 X (Sat Day)	=	13
38.67 X (2 W/End Nights)	=	77
Total (1 Week)	=	448

The estimated number of weekly Hackneys is derived in the same fashion.

The overall weighted passenger delay at this rank is then derived as follows:

54 X 5 X (Average Passenger Delay of 0.42)	=	113.4
22 X 4 X (0)	=	0
13 X (2.69)	=	34.97
38.67 X 2 X (0)	=	0

Total = 148.37 and this / 448 = 0.33 minutes weighted average passenger delay at this rank.

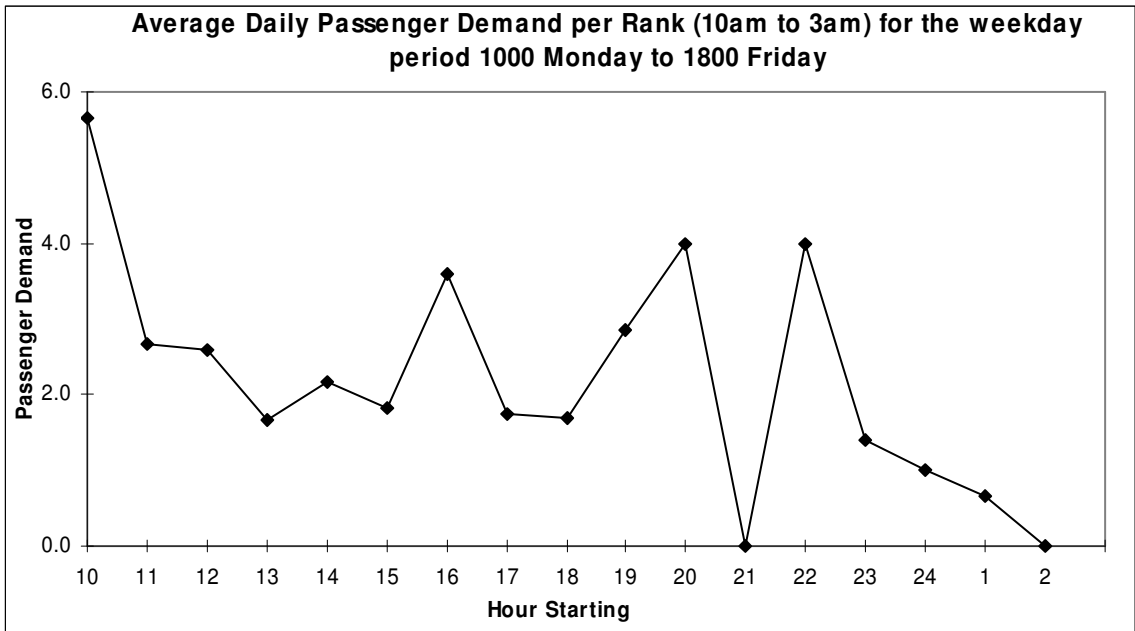
The overall weighted average Hackney delay at this rank is calculated in the same fashion.

3.16 An Average Passenger Delay across all the ranks of 0.42 minutes is then calculated from the sum of multiplying the weekly passenger departures at each rank by the average passenger delays at that rank, (i.e. 448\*0.33 for Crown Road), divided by the total weekly passengers at all ranks. Similarly the average Hackney delay which works out at 34 minutes. Therefore, overall the observations suggest that in total there are approximately 1743 passenger departures and 1835 Hackney departures per week from all the ranks in Thurrock and that on average each passenger waits 0.42 minutes for a Hackney and each Hackney waits an average of 34 minutes for a passenger.

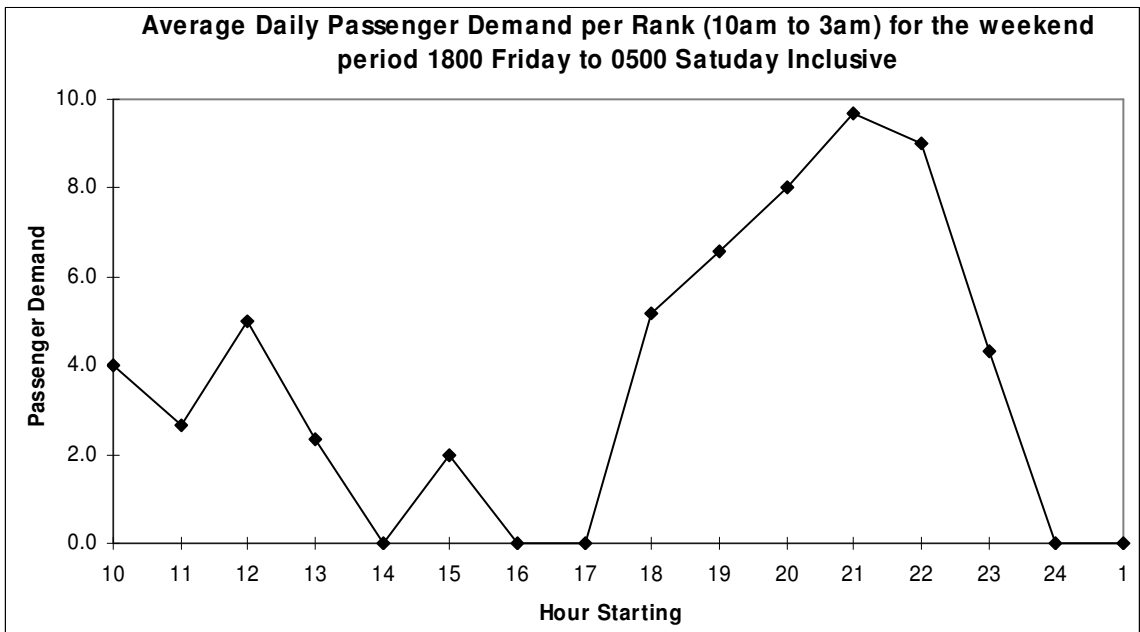
### **The Delay/Demand Profile**

- 3.17 The above analysis can hide variations in service performance at different times of the day and of the week. To investigate the nature of passenger delay at ranks further, analysis has also been conducted by time of day and day of the week.
- 3.18 Figure 3.1 provides a graphical illustration of average daily passenger demand per rank from 10:00 Monday to 18:00 Friday. Figure 3.2 shows the equivalent information for the period 18:00 Friday to 05:00 Saturday.
- 3.19 Figure 3.1 shows passenger demand increases from 15:00-16:00, before dipping at 17:00. Demand then continues rising up until 20:00. After this time demand falls at 21:00 before rising until 22:00.
- 3.20 The situation at the weekend is shown in Figure 3.2. Demand falls between 11:00 and 17:00. From 18:00 demand begins to rise and peak sharply throughout the night at 21:00, after which demand drops off.
- 3.21 The two profiles are combined and factored accordingly to represent average weekly profiles in Figure 3.3. The figure shows that, overall, demand in Thurrock does exhibit a high degree of peaking in the evening and late at night at weekends alone. As such demand can be classed as being highly peaked.
- 3.22 In terms of passenger delays Figure 3.4 and 3.5 provide an illustration by time of day for the 10:00 Monday to 18:00 Friday and 10:00-03:00 weekend periods, respectively.
- 3.23 During the 10:00 Monday to 18:00 Friday period, minimal passenger delay occurs. The peak passenger delay of 1.4 minutes occurs at 15:00 on a weekday afternoon.
- 3.24 During the 18:00 Friday to 03:00 Saturday period passenger delays are experienced between 10:00 and 13:00 and between 20:00 and 01:00. The peak passenger delay of 17 minutes occurs between 11:00-12:00 on a weekend morning.
- 3.25 Figure 3.6 provides an illustration by time of day for the weekday and weekend periods combined.

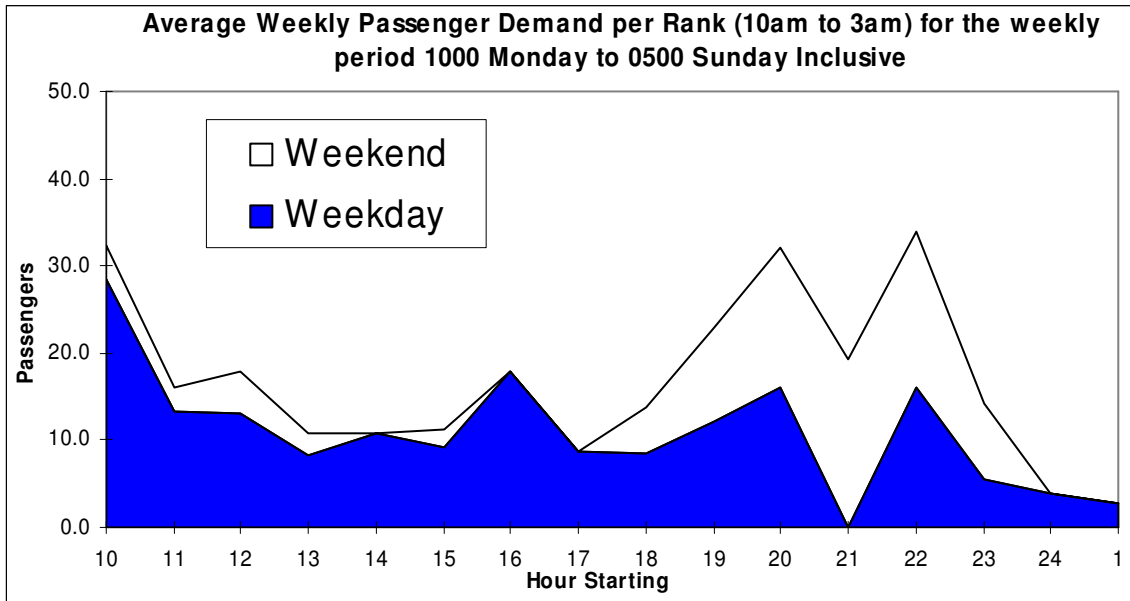
**Figure 3.1 Average Daily Passenger Demand across all Ranks (1000-0300) for the Weekly period 10:00 Monday to 18:00 Friday Inclusive**



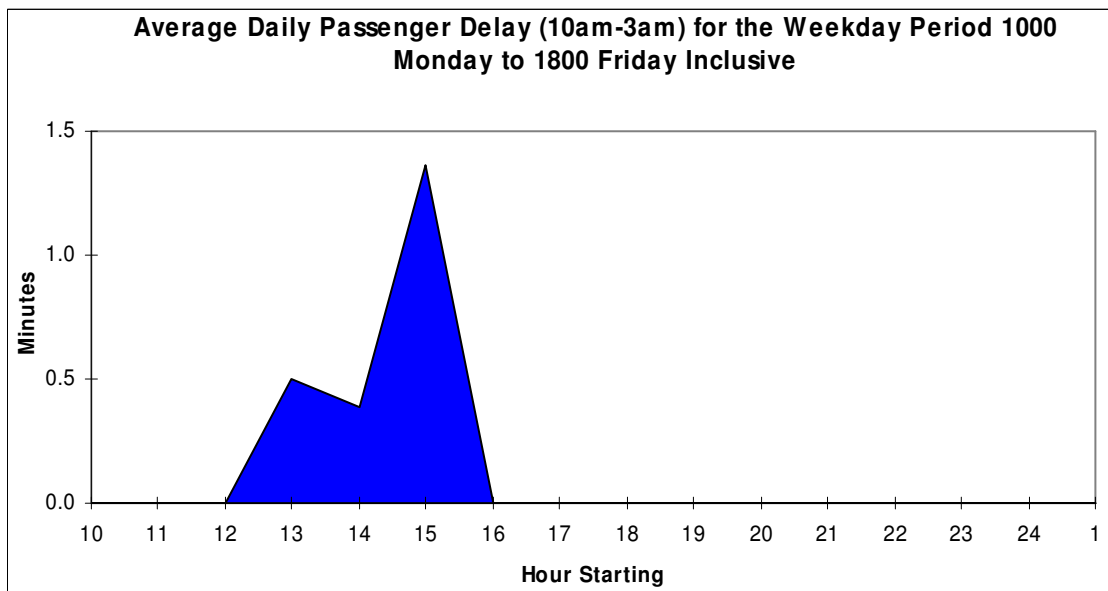
**Figure 3.2 Average Daily Passenger Demand across all Ranks (1000-0300) for the Weekend Period 18:00 Friday to 05:00 Saturday Inclusive**



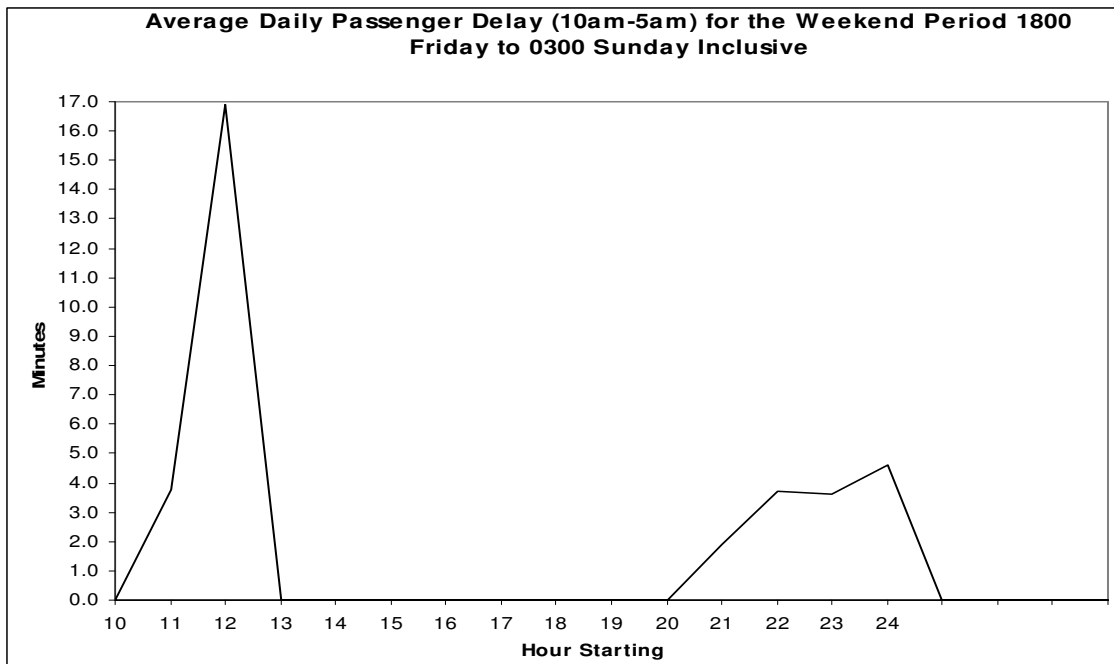
**Figure 3.3 The Average Weekly Passenger Demand per rank for all Ranks (1000-0300) for the weekly period 10:00 Monday to 05:00 Sunday**



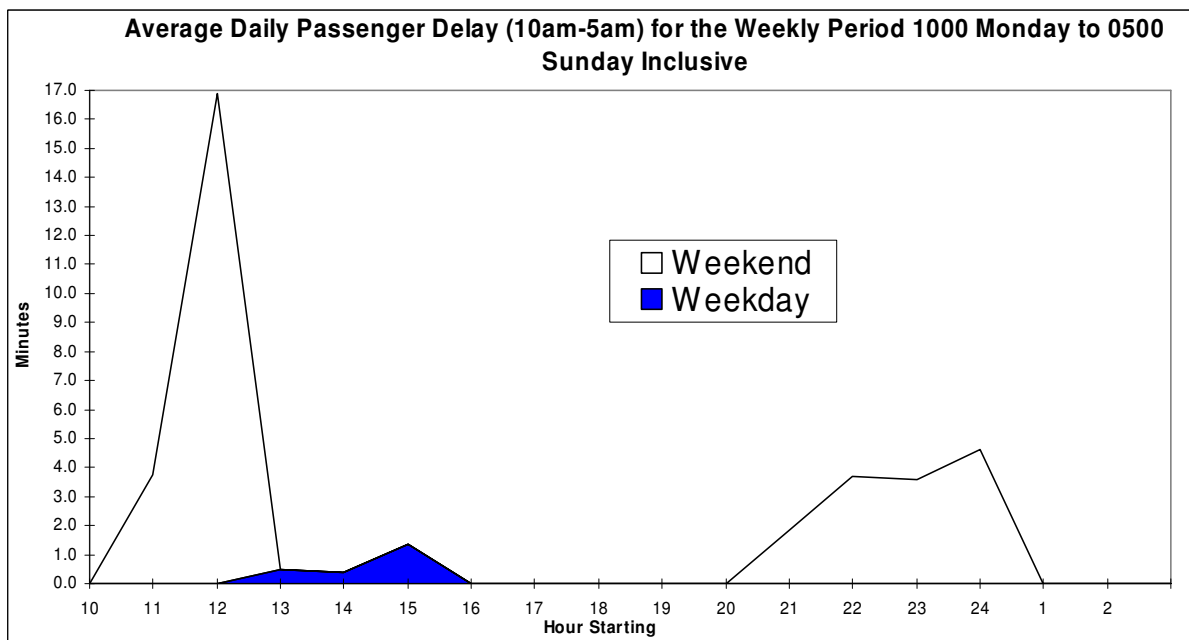
**Figure 3.4 Average Daily Passenger Delay (1000-0300) for the Weekly period 10:00 Monday to 18:00 Friday Inclusive**



**Figure 3.5 Average Daily Passenger Delay (1000-0200) for the Weekend Period**



**Figure 3.6 Average Daily Passenger Delay (1000-0200) for the Week**



### Indicator of Significant Unmet Demand

3.26 A single indicator of unmet demand can be calculated taking into account the size and incident of passenger delay and the effect of peaks in demand. It is defined as the product of the average passenger delay, the percentage of passengers travelling in hours where the average delay is greater than or equal to one minute and the percentage of excess demand. If peaking demand is present the average delay is factored by 0.5 to allow for the disproportionate effect of late night demand on the overall average delay. That is to say, the four main indicators from the rank observations, as follows:-

- 1 the average passenger delay across all time periods (APD);
- 2 the incidence of passenger queues (Excess Demand) during the Monday to Friday daytime period (ED);
- 3 the proportion of Hackney users travelling in hours where the delay at ranks was greater than or equal to one minute (P1); and
- 4 whether the demand profile is highly peaked (HP).

3.27 Using these indicators a simple Index of Significant Unmet Demand (ISUD) has been developed as follows (where HP = 1 if no peaking and 0.5 if peaking is present)

$$\text{ISUD} = \text{APD} \times \text{ED} \times \text{P1} \times \text{HP}$$

The value of this indicator for Thurrock is 0:

$$\begin{aligned} \text{ISUD} &= \text{APD} \times \text{ED} \times \text{P1} \times \text{HP} \\ &= \mathbf{0.42 \times 0 \times 20.64 \times 0.5 = 0} \end{aligned}$$

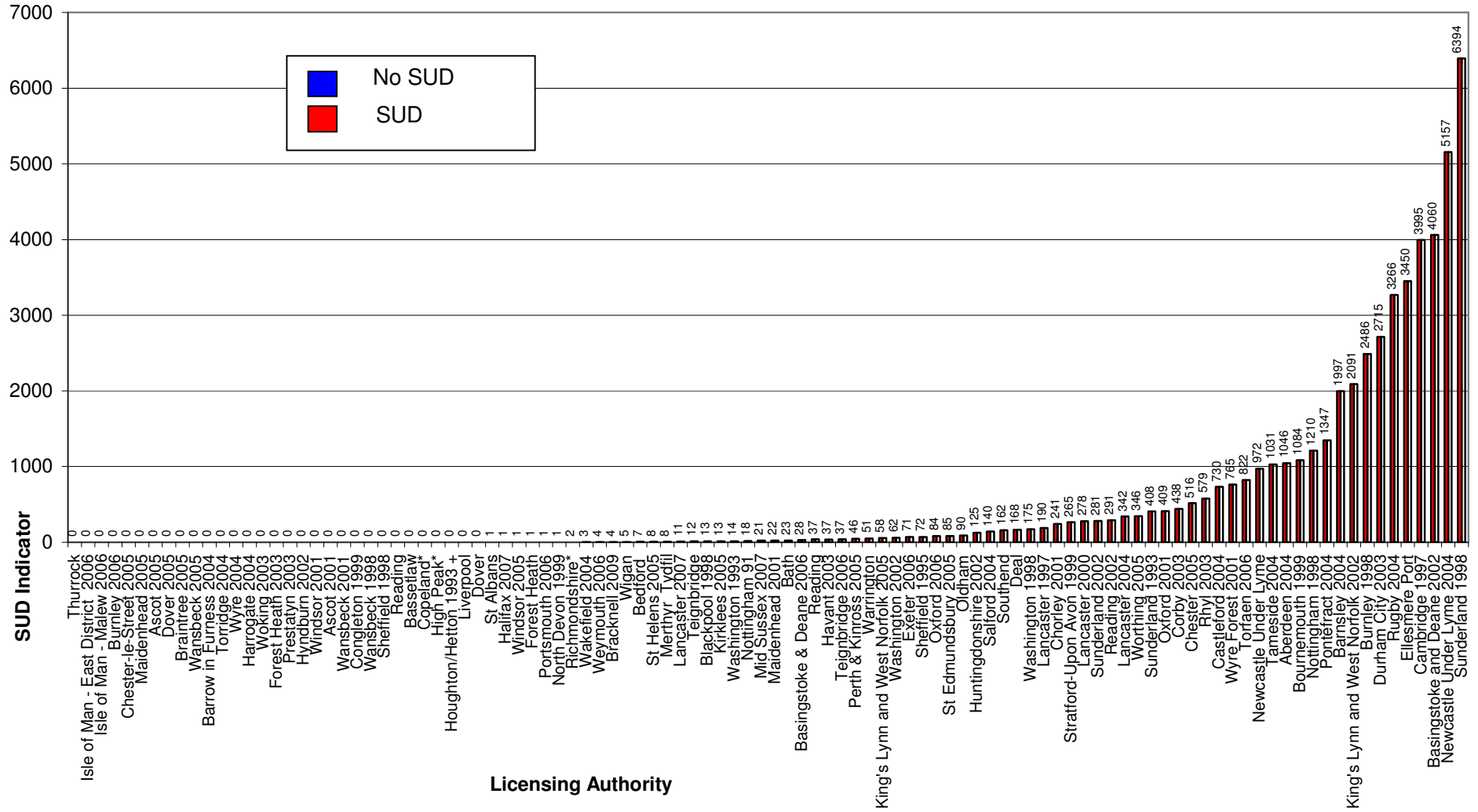
3.28 At the time the method was devised, those authorities where previous studies had resulted in a conclusion of significant unmet demand had produced values of 90, 162, 196, 275, 282, 408 and 972. At that time, the highest value obtained for a study where a conclusion of no significant unmet demand had been reached was 71. This suggests a threshold value of around 80 to use as a benchmark. The value of the indicator for Thurrock is 0 which results in a conclusion of there being no significant unmet demand in the rank based taxi market.

3.29 Figure 3.7 shows the Significant Unmet Demand (SUD) Indicator Value in Thurrock compared with over 100 other Authorities. It can be clearly seen that the location of the Thurrock ISUD is in the range suggesting that there is No Significant Unmet Demand.



Figure 3.7

Significant Unmet Demand (SUD) Indicator Value in Reading Compared with Other Authorities



### Comparison with other authorities

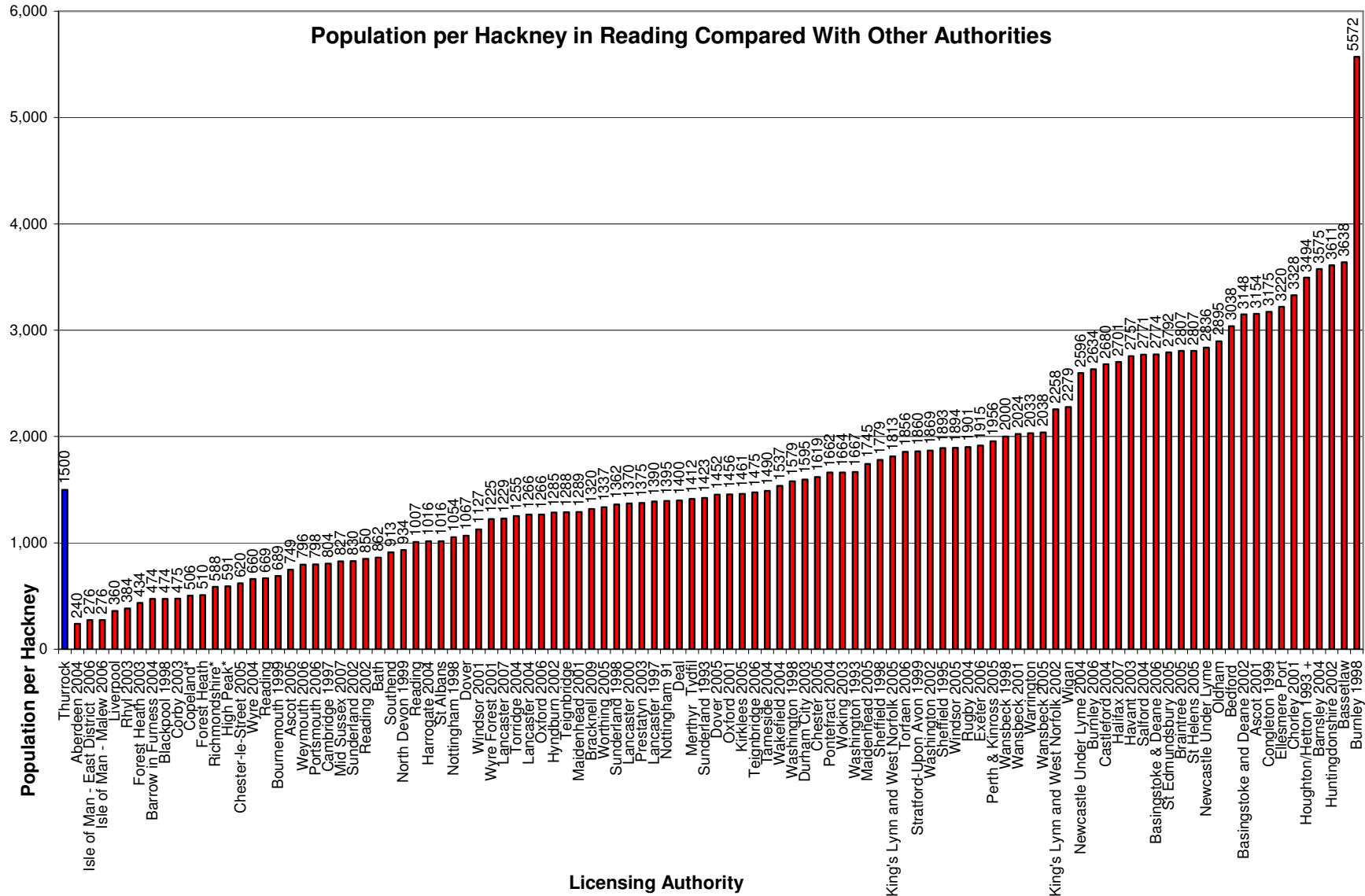
- 3.30 Any comparisons between authority areas should be treated with some caution. Areas vary widely according to population density, total population, public transport provision, car ownership and many other socio-economic and physical characteristics. However, previous studies undertaken over time can provide useful comparators. The following main points can be made about the results in Thurrock compared to other districts:

**Table 3.6 Key indicators compared to average of 100 previous studies**

	<b>Population per Hackney</b>	<b>Average Passenger Delay in min</b>	<b>Average Hackney Delay in min</b>	<b>% Excess Demand</b>
<b>Thurrock</b>	1,561	0.42	34	4.17
<b>Average for 100 others</b>	1,669	1	12.47	8.77

- 3.31 The population supplied by each Hackney in Thurrock is 1,561, compared to the average of 1,699 for the 100 other districts cited.
- 3.32 Other key indicators also demonstrate Thurrock in a better than average position compared to the average for other licensing authorities, except in terms of the delay experienced by Hackneys waiting for a passenger, which for Thurrock is 34 minutes compared to an average of 12.47 minutes for the other 100 authorities .
- 3.33 Figure 3.8 overleaf shows the Population per Hackney in Thurrock compared to other Authorities.

Figure 3.8



## 4.0 ON STREET SURVEY

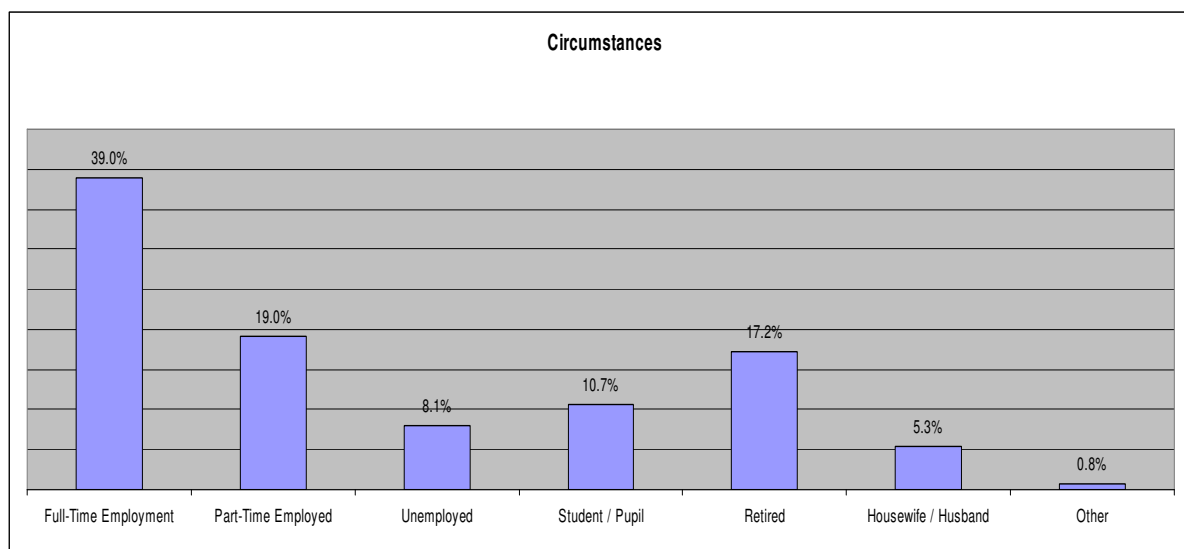
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### Introduction

- 4.1 A public attitude survey was undertaken in key town centre locations across Thurrock to assess Hackney Carriage and PHV use, flag down and telephone delays, and levels of satisfaction. The survey also provided information on the views of frequent, infrequent and non-users of taxis throughout different parts of Thurrock. The survey structure comprised two elements. The first part identified the specific characteristics of a person's most recent taxi trip undertaken in the last three months. The second part analysed respondents, longer term, Hackney Carriage requirements and factors influencing their amount of Hackney Carriage use.
- 4.2 A total of 700 valid surveys were obtained. It should be noted that in the tables that follow the totals do not always add up to the same amount. This is due to either not all respondents being required to answer all questions, some respondents failing to answer some questions or some questions allowing multiple responses. Where the latter applies this is highlighted in the title of the table.

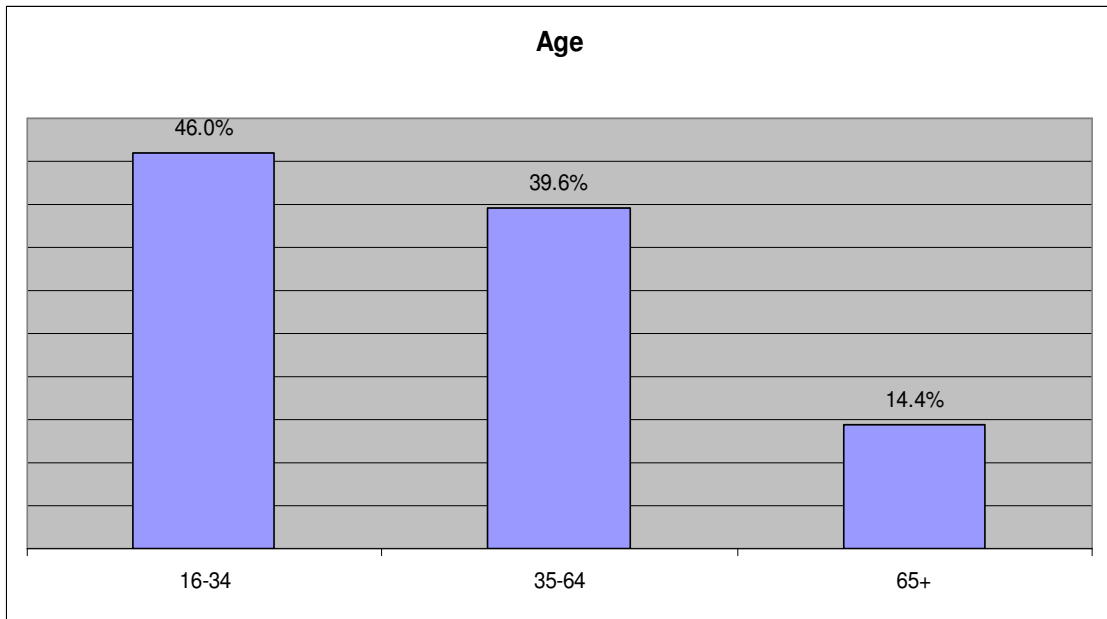
### Demographics

- 4.3 Of the respondents 39% were employed on a full time basis, with 19% in part-time employment. 10.7% of those who were questioned were students/pupils, 17.2% were retired and 8.1% were currently unemployed.



Source: TPI

- 4.4 Of the respondents 46% were in the 16-34 year age group, 39.6% in the 34-65 year age group and 14.4% who were over 60 years of age.



Source: TPI

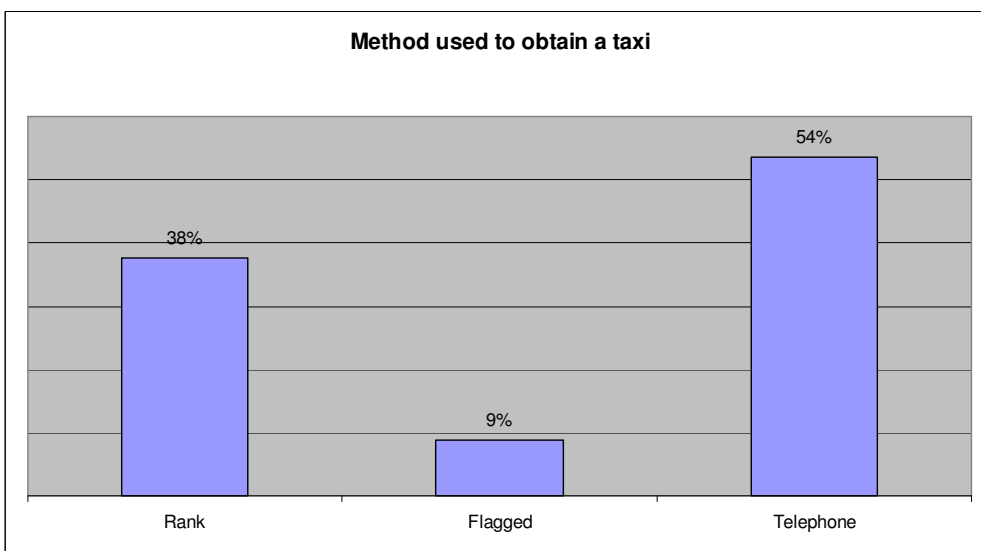
4.5 There were 49.5% of respondents that were male and 50.5% female.

**Characteristics of the most recent trip made within the last three month period**

4.6 Asked if they had made a journey by taxi in the last three months, 48.7% of respondents said they had, while the remaining 51.3% of respondents stated that they had not used a taxi within the last three months.

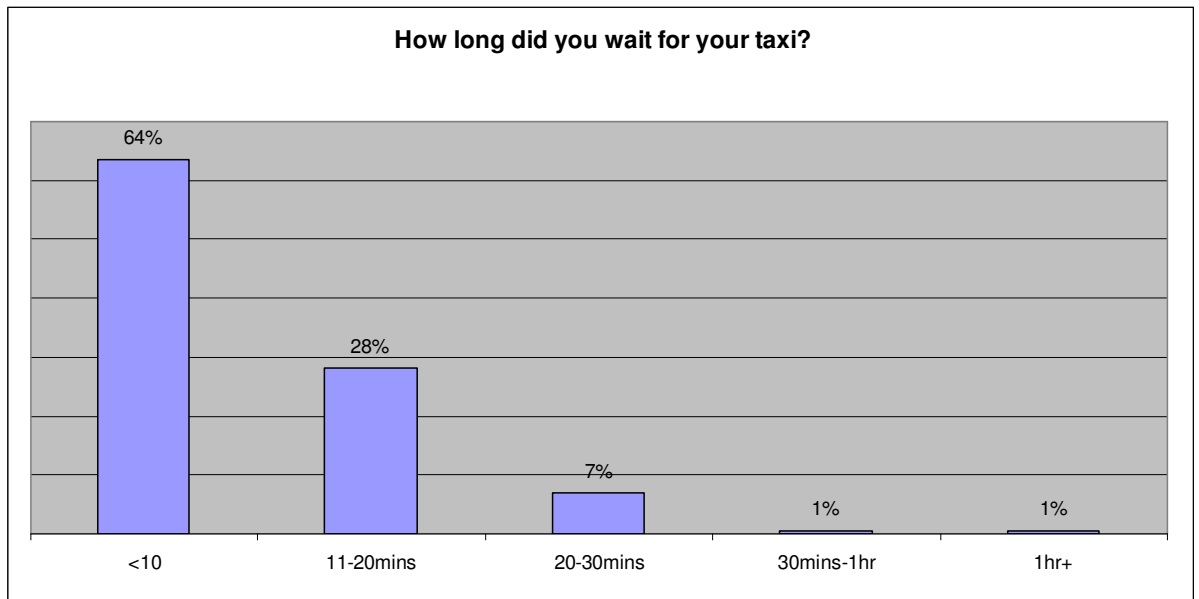
4.7 Those who had made a recent taxi journey were asked how they made their last trip. There were 39.2% of respondents that had made the trip in a Hackney Carriage whilst 60.8% of respondents stated that they had used another type of vehicle, usually a PHV.

4.8 Of those who indicated that they had used a taxi in the last three months 37.7% obtained a taxi at a rank, 8.8% flagged down a vehicle and 53.5% booked a taxi by phone



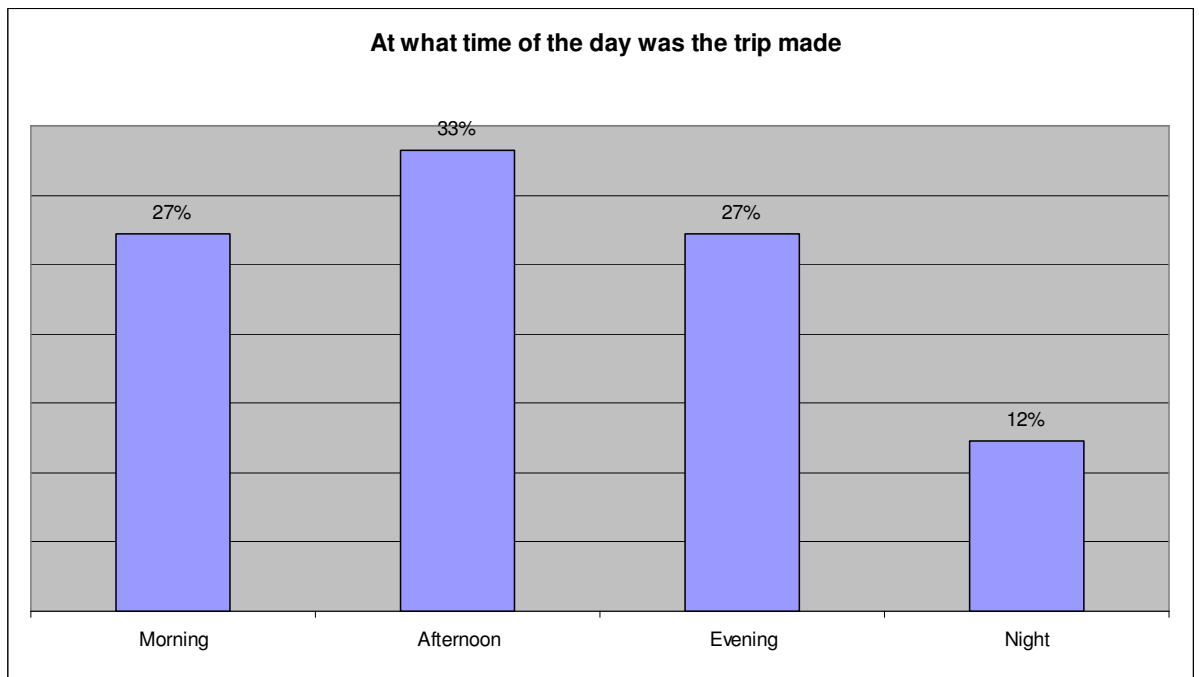
Source: TPI

4.9 63.6% of the respondents stated that they waited less than 10 minutes for their taxi to arrive. 28.1% said that they waited between 11 and 20 minutes for the taxi. 6% of respondents waited more than an hour for their vehicle.



Source: TPI

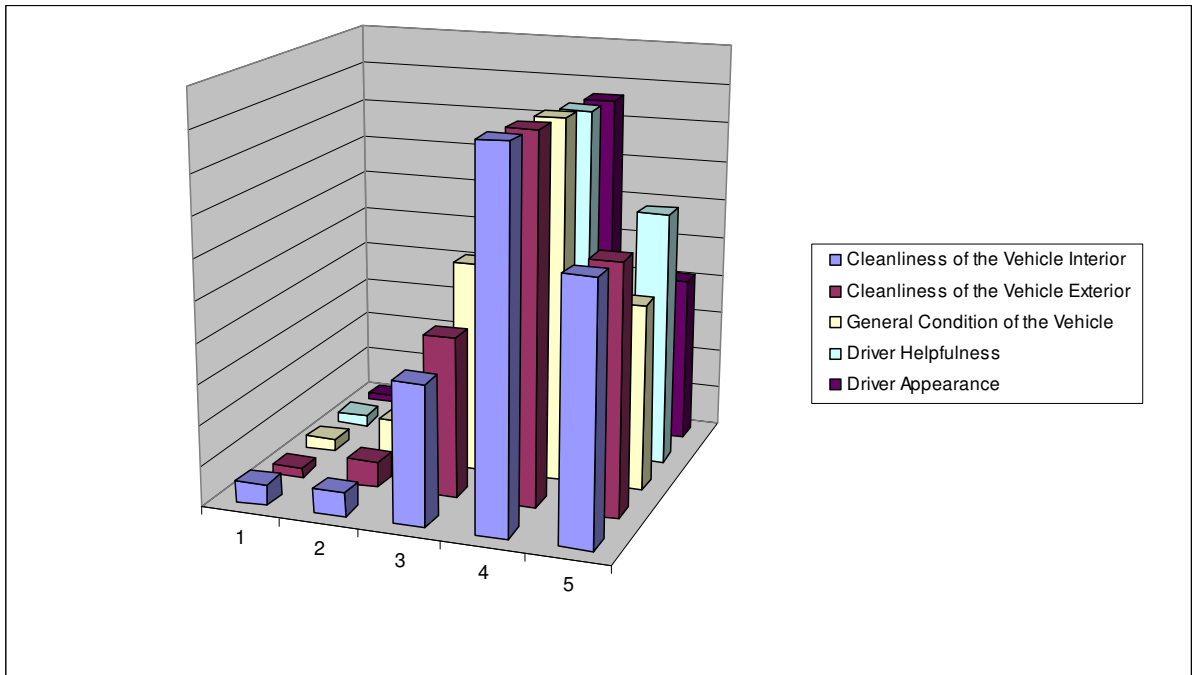
4.10 The spread across the times of the day taxis were used was fairly even, with 27.2% using taxis in the morning, 33.2% using taxis in the afternoon and 27.2% using taxis for journeys in the evening. The remaining 12.3% used taxis for journeys at night.



Source: TPI

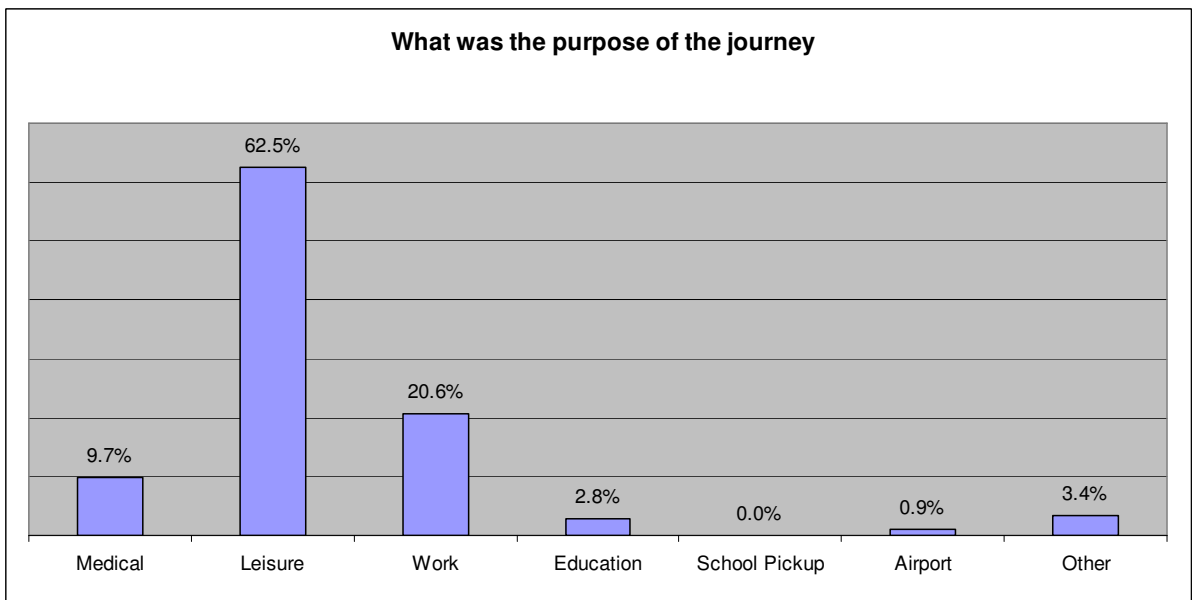
4.11 Respondents were asked to rate their trip for cleanliness of the vehicle both inside and out, the general condition of the vehicle, and the taxi drivers helpfulness and appearance. A scale of 1 to 5 was used with 1 being very poor, 3 being average, and 5 being very good. The results are shown on the chart below. The majority of

respondents rated the taxi and its driver as good or very good. Across all five aspects.



Source: TPI

4.12 Of the respondents that recently used a taxi, 62.5% had done so for the purpose of Leisure. Journeys for work purposes were cited by 20.6% with a further 9.7% stating they used a taxi for Medical reasons.

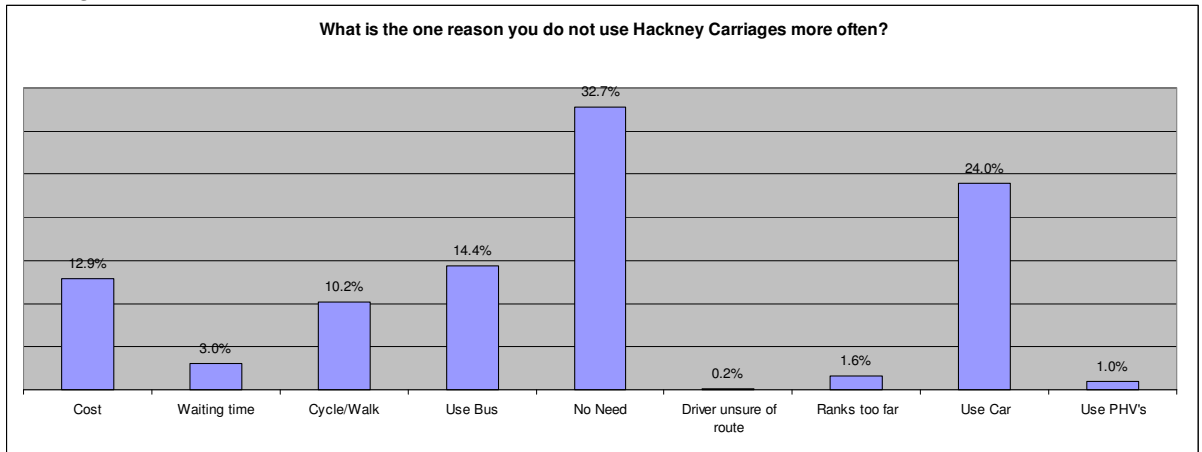


Source: TPI

### Hackney Carriage Use

4.13 To determine overall opinions toward the use of Hackneys, all respondents were asked to identify the principal factors which limit their use. Of the 626 valid responses, results suggested the main limitation was the lack of need (32.7% of responses). 24% of responses stated that they used a car, 14.4% preferred to use

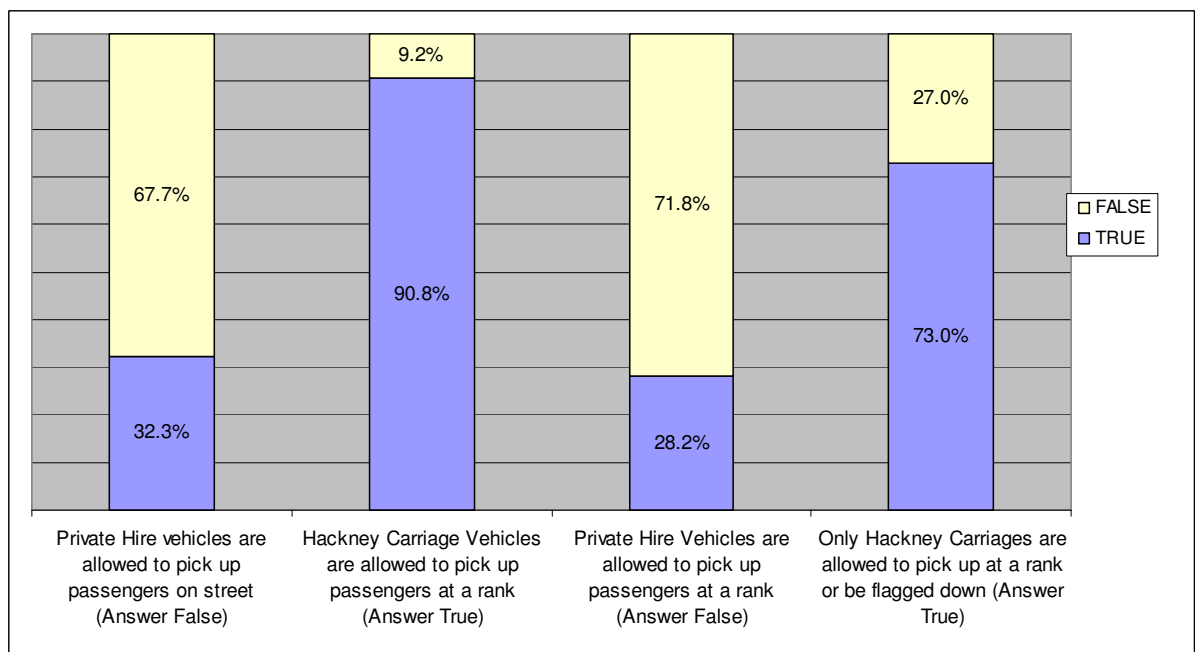
travel by bus. Other significant deterrents were the cost (12.9%) the respondents' preference to walk or cycle (10.2%) and 3% said that taxi use was limited by the waiting time.



Source: TPI

### Knowledge of Hackney Carriage

4.14 Respondents were asked about their knowledge of the legality of obtaining a taxi at a rank or on street by answering true or false to the following four statements.



Source: TPI

4.15 The results show that approx 7 out of 10 people knew it was illegal to for a PHV to pick up fares at ranks or be flagged down in the street. Approximately 9 out of 10 people knew that Hackney Carriages could pick up from a rank, and 7 out of 10 that only Hackney Carriages could be flagged down on the street.

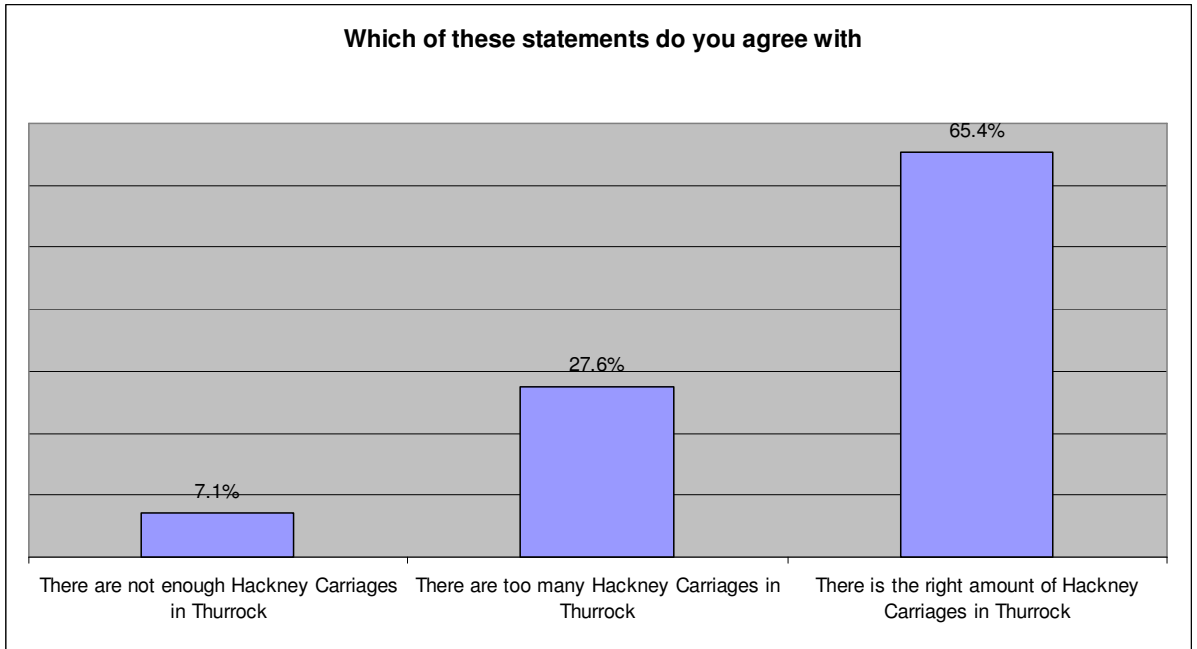
### Hackney Carriage Provision

4.16 All respondents were asked whether they thought the level of Hackney Carriages in Thurrock was satisfactory. Of the 528 valid responses to the question, only 16.5%



said the level was unsatisfactory with 47.9% stating that the level was satisfactory and 35.6% having no opinion.

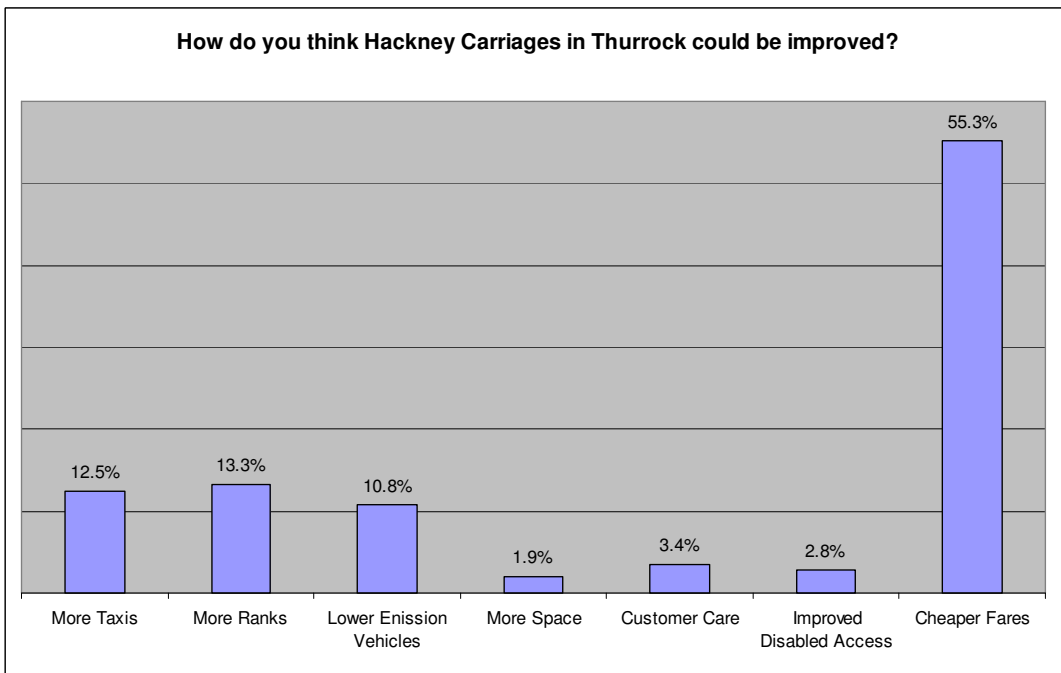
- 4.17 When asked if there were enough hackneys in Thurrock, 65.4% of respondents said that in their opinion there were the right amount of vehicles, 27.6% said there were too many and only 7.1% thought there were not enough.



Source: TPI

### Potential for improvement

- 4.18 The survey asked respondents what improvements they would like to see to Hackney Carriage services in Thurrock.



Source: TPI

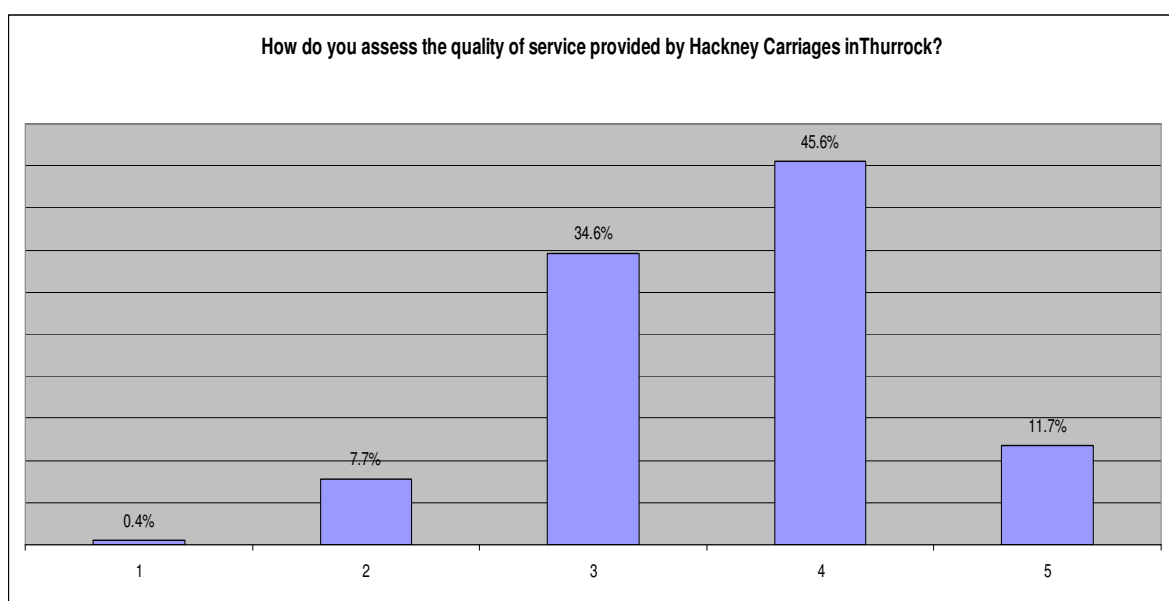
- 4.19 By far the most often cited improvement was cheaper fares (55.3%). Other significant suggestions for improvement were more taxi ranks (13.3%), more taxis (12.5%) and the use of lower emission vehicles (10.8%).
- 4.20 Respondents were also asked whether there were any locations where they would like new ranks introduced. Only 10% of respondents made suggestions as follows, with Morrisons being the most popular (6 respondents):

**Table 4.3 Suggested Locations for New Ranks**

Location	Frequency	Location	Frequency
Morrisons	6	Romford	1
Lakeside Retail Park	5	Fobbing	1
Chafford Hundred Railway Station	5	London Road	1
Purfleet Station	5	Sand Martins Pub	3
Aveley	3	Clarence Road, Grays	1
Shopping Centres	3	Hathaway Road, Grays	1
Barking and Dagenham	2	Brook Road Clinic	1
Socketts Heath	2	Ockendon	1
Bus Station	1	West Thurrock	1
Train Station	1	Derwent Road, South Ockendon	1
Little Thurrock	1		

Source: TPI

- 4.21 Respondents were asked to rate the quality of the service provided on a scale of 1 to 5 (with 1 being very poor, and 5 being very good). Of the 454 valid replies, 11.7% assessed the service to be very good, 45.6% rated the service as good with 34.6% thought the service was average. 7.7% of respondents said the service was poor or very poor.



Source: TPI

## 5.0 CONSULTATION

### Trade Consultation

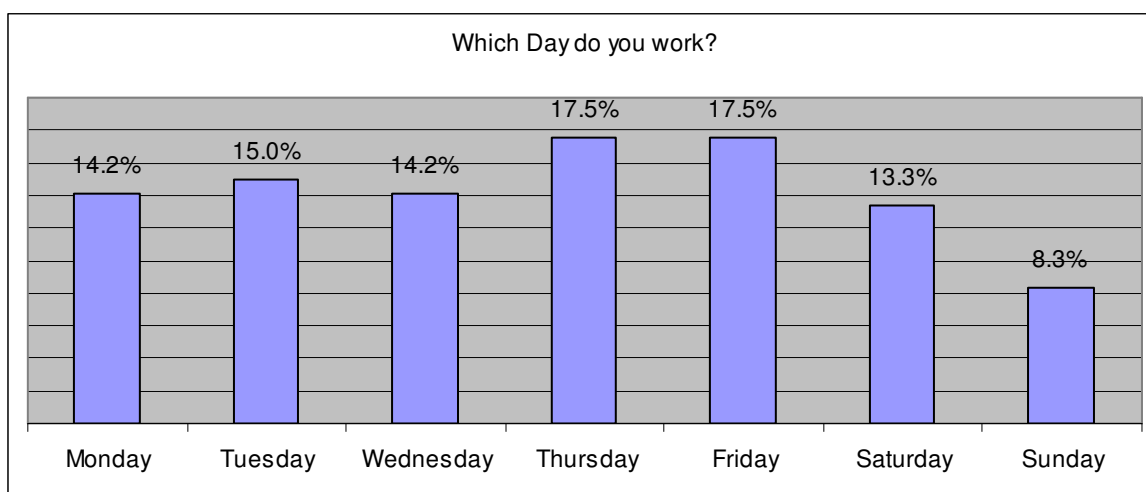
- 5.1 A consultation letter and pro-forma was circulated by the council to licensed hackney carriage drivers in the Thurrock Area. This encouraged responses in writing, by telephone, by e-mail or to a series of questions using the pro-forma. A total of 26 pro-forma responses were received the answers to which are collated below. Of these 93% stated that they were from drivers of Hackney Carriages and of these 86% stated that they owned their vehicles.
- 5.2 35% of respondents shared a vehicle with another driver with 65% of respondents stating that they were the only driver. There were 27% of respondents who drove vehicles that were wheelchair accessible with the remaining 63% of valid respondents stating that their vehicles were not adapted to take wheelchairs.
- 5.3 Respondents were asked to estimate the average number of journeys (per taxi) they undertake, each week.

**Table 5.1 Journeys per week**

Average Journeys...	%
From Ranks	36
From Contracts	26
From Telephones	33
From Flag Downs	5
<b>Total</b>	<b>100</b>

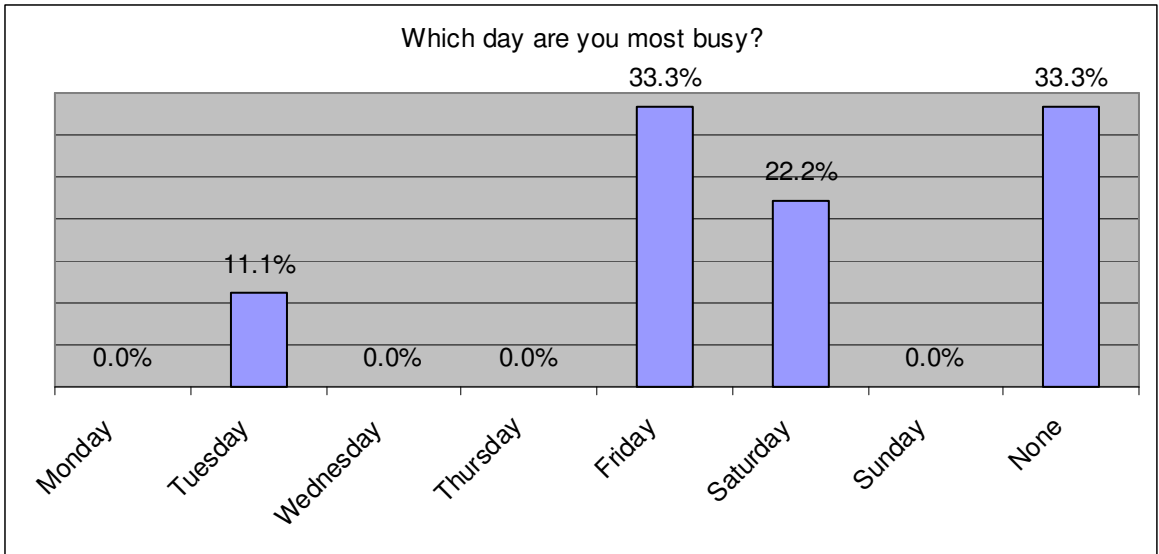
Source: TPI

- 5.4 Amongst hackney carriage drivers, 36% of journeys each week originate from the rank, 5% from flag downs, 33% from telephone bookings and 26% from contract work. Most drive on at least 6 days and a number on 7 days a week. The least number of drivers operate on Sundays.

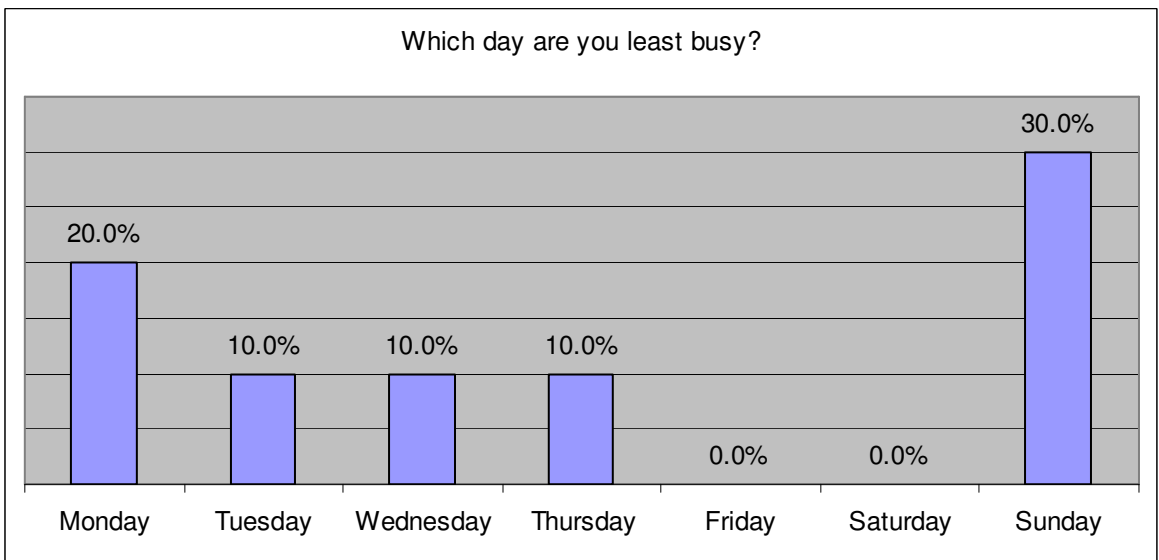


Source: TPI

- 5.5 The busiest day for taxi drivers was Friday (33.3%). With a further 33.3% of respondents stating that none of their days were busy

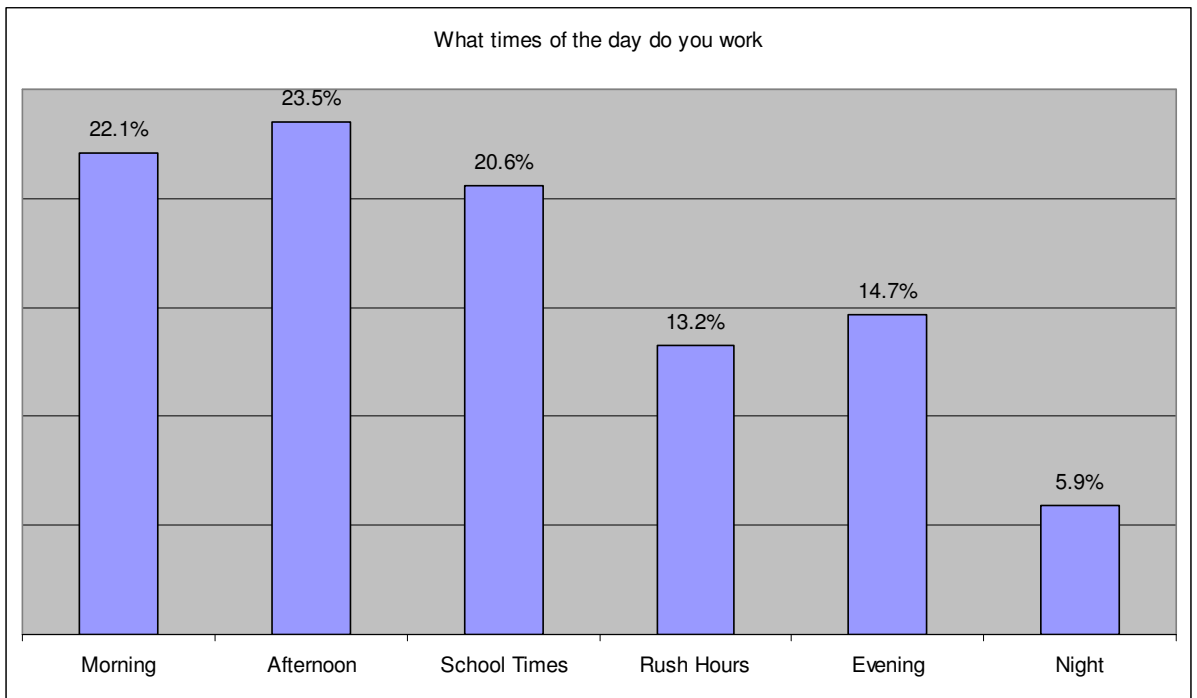


Source: TPI



Source: TPI

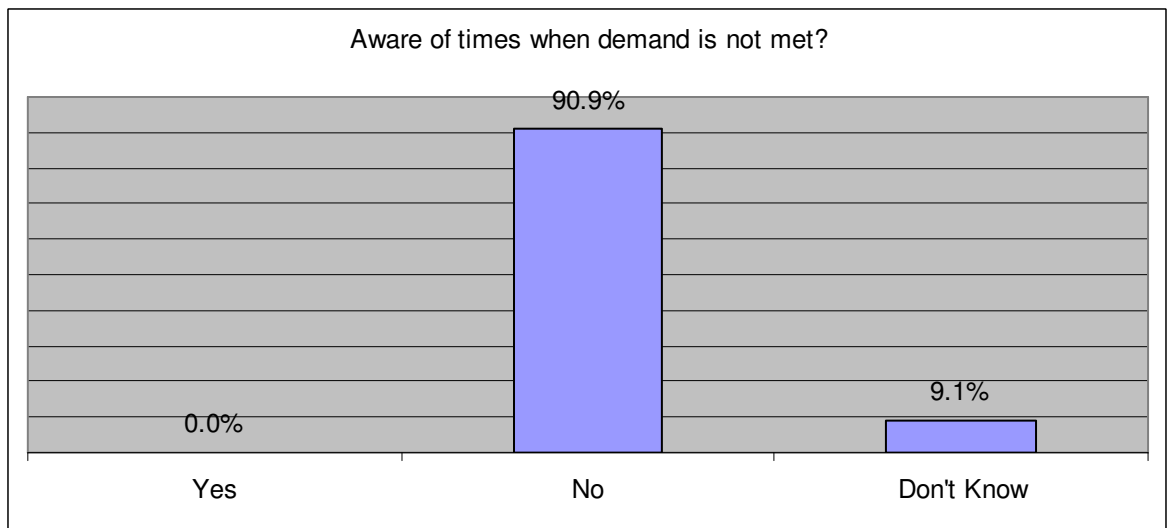
- 5.6 30% of respondents said that Sundays were their least busy day, although there were drivers that indicated that most days of the week were quiet.
- 5.7 Most drivers stated that they worked during the afternoon (23.5%) and in the morning (22.1%). Respondents were allowed multiple responses to this question.



Source: TPI

5.8 Asked about the supply of Hackneys in Thurrock 95.7% of respondents felt that it was adequate. Similarly 86.7% of respondents thought PHV supply was adequate.

5.9 Asked if they were aware of any times when demand is not met for taxis in Thurrock, 90.9% of respondents said they were not and 0% stated that they were, and 9.1% respondents did not know.

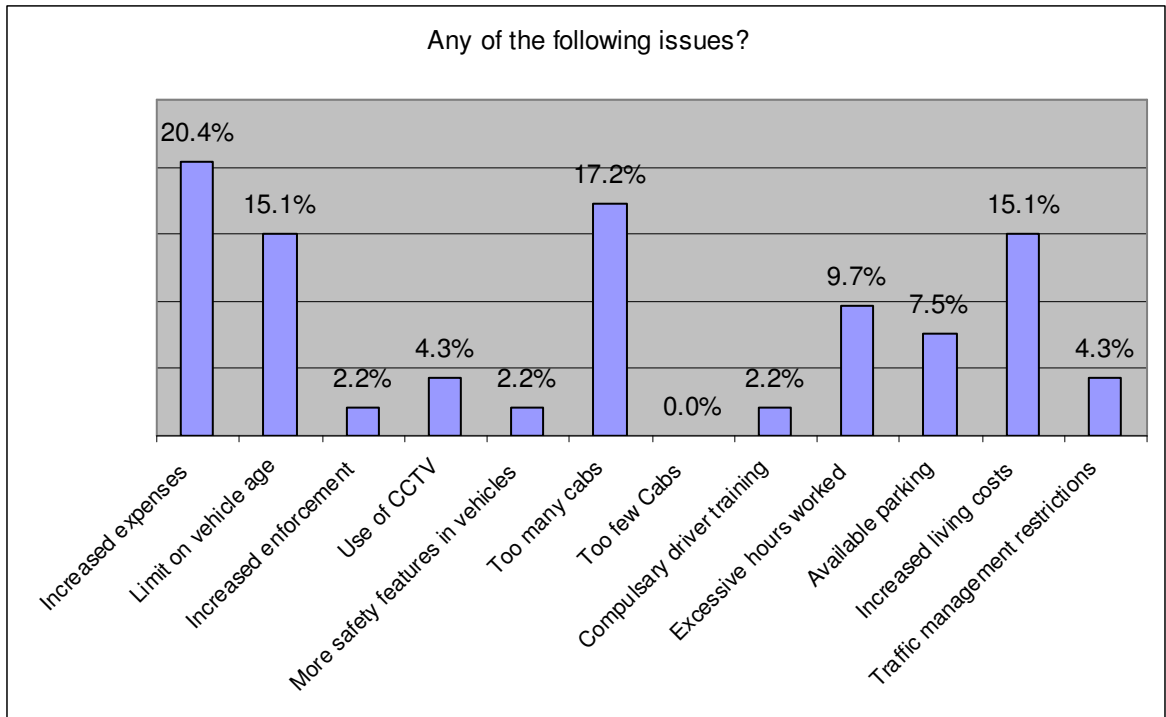


Source: TPI

5.10 Drivers were asked if they believed any of the following posed an issue to them (respondents were allowed multiple responses):

- Increasing expense of vehicles and fuel
- A limit of age on the vehicles
- Increased enforcement
- Use of CCTV
- Use of more Safety Measures
- Too many Cabs
- Too Few cabs available
- Compulsory driver training
- Excessive hours worked
- Available Parking
- Increased cost of living
- Traffic management schemes

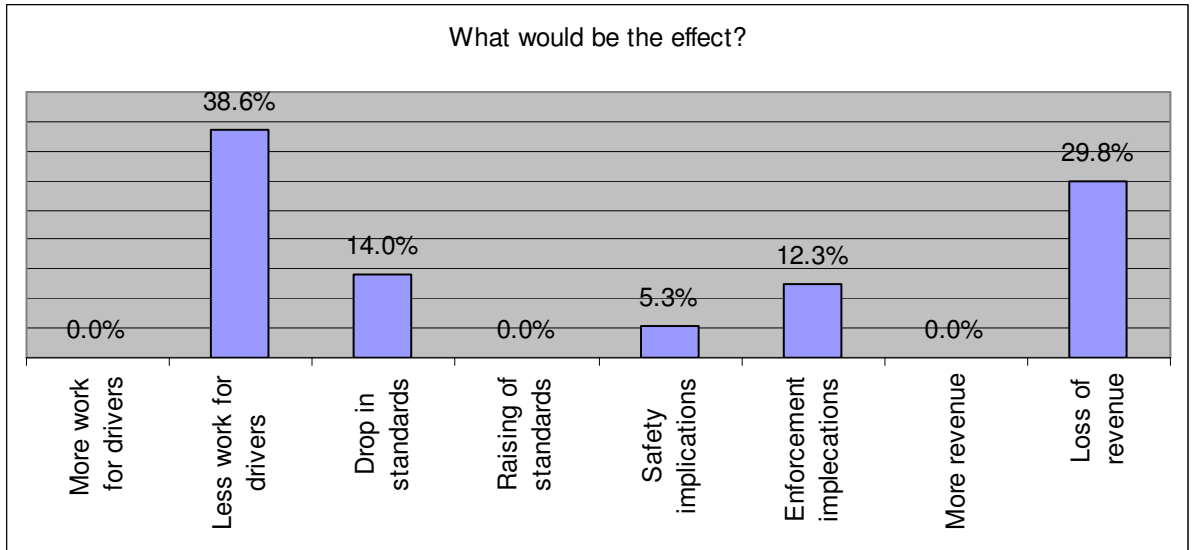
5.11 Drivers thought that increasing vehicle and fuel expenses (20.4% of respondents) and too many taxis (17.2% of respondents) were the main issues they faced. The next most significant issue was, the increased cost of living (15.1%), limit on vehicle age (15.1%), excessive hours worked (9.7%) and available parking (7.5%). Respondents were allowed multiple answers to this question.



Source: TPI

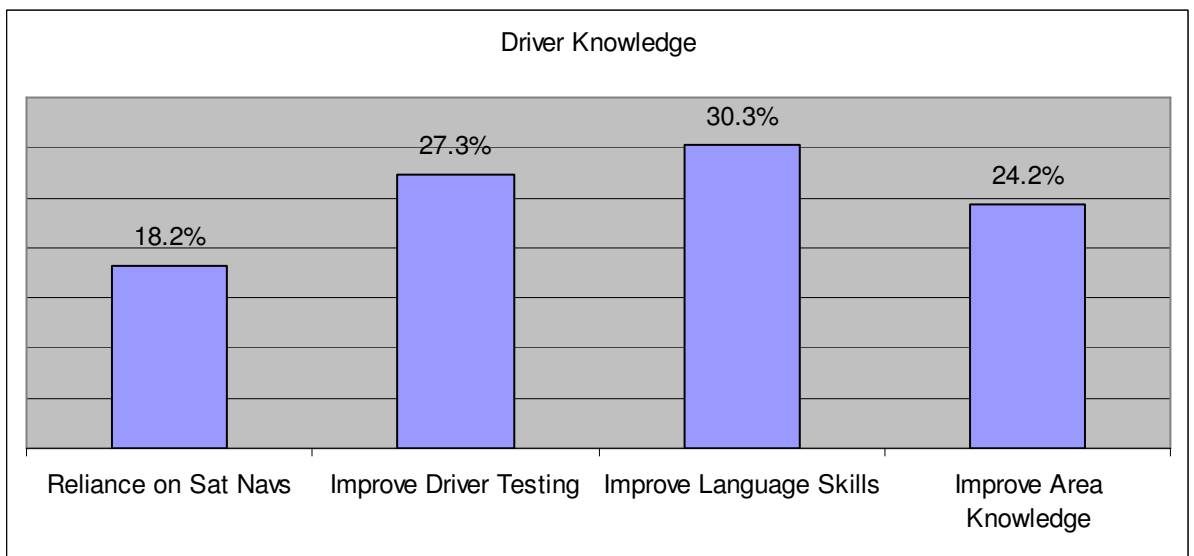
5.12 Asked if there would be an impact if there was an increase in the number of taxis, 95.7% of respondents said that there would, with only 4.3% stating that in their opinion there would be no effect.

5.13 Of those respondents who thought there would be an effect on the taxi trade in the local area, the majority thought that there would be with less work for drivers (cited by 38.6% of respondents). Other significant affects suggested was the loss of revenue (by 29.8% of respondents) and a drop in standards (by 14% of respondents). Respondents were allowed multiple answers to this question.



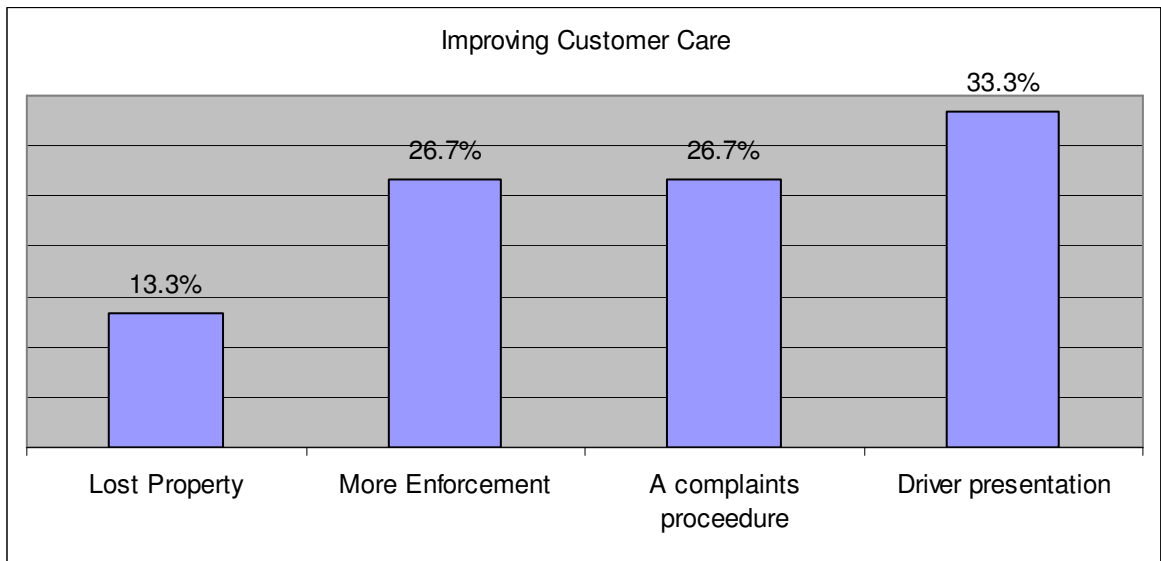
Source: TPI

- 5.14 Drivers were asked about driver knowledge of the Thurrock area. Asked if they were satisfied with most taxi driver's local knowledge 50% of respondents said that they were, 45.5% stated that they weren't, with 4.5% stating that they had no opinion.
- 5.15 When asked which issues should be addressed 25.2% of respondents that thought drivers knowledge of the area could be improved 30.3% thought language skills could be improved and 18.2% also thought that drivers relied too much on satellite navigation systems. 27.3% of respondents thought that driver testing should be improved. Respondents were allowed multiple answers to this question.



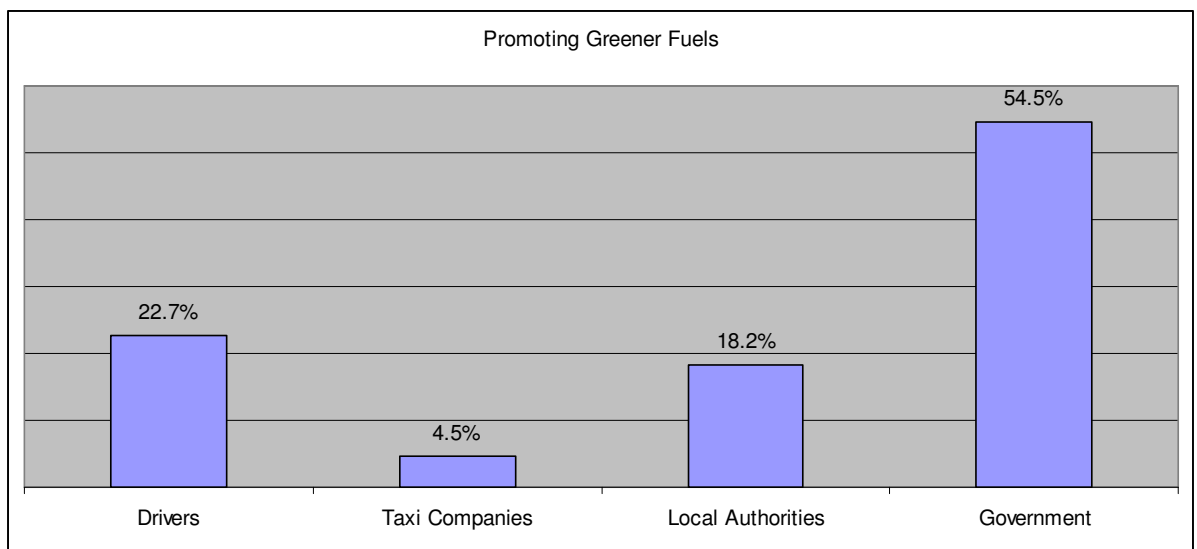
Source: TPI

- 5.16 When asked if customer care was adequate 73.9% of respondents said that in their opinion it was, with 17.4% thinking that it could be improved.
- 5.17 There were 33.3% who would like to see improvements to general driver presentation, 26.7% wanted improvements to the complaints procedures and 26.7% wanted more enforcement of regulations. Drivers were allowed multiple responses to this question



Source: TPI

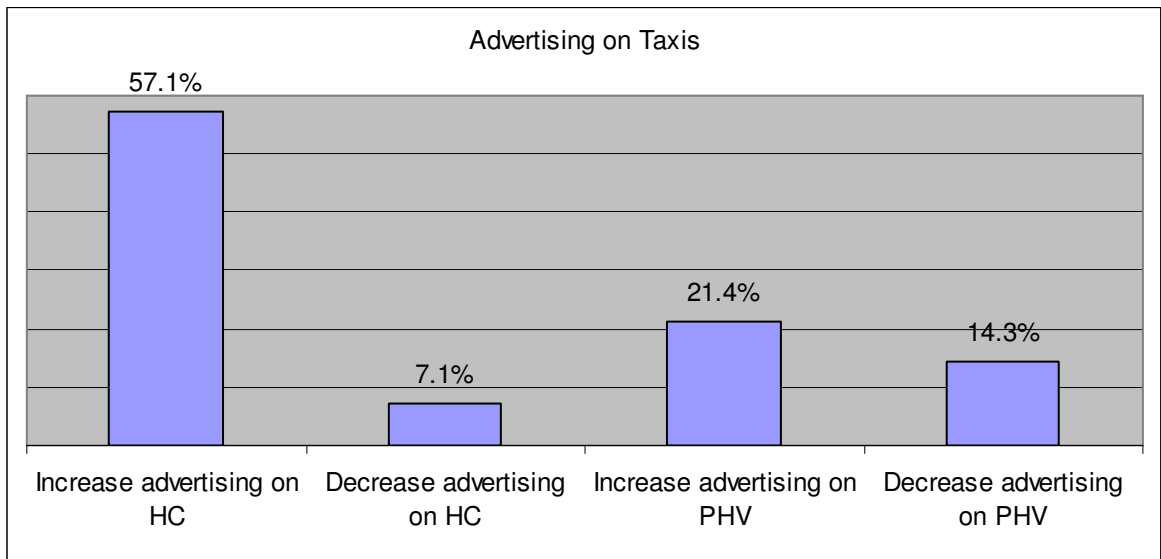
- 5.18 Drivers were asked about the promotion of greener fuels. 81.8% of respondents said that they agreed with green fuel promotion with 9.1% disagreeing with promotion and 9.1% of respondents unsure
- 5.19 54.5% of respondents thought that it was the governments responsibility to promote greener fuels, 22.7% believed it should be the drivers, 18.2% thought the promotion should be done be the Licensing Authority and 4.5% that thought it should be promoted by taxi operators.



Source: TPI

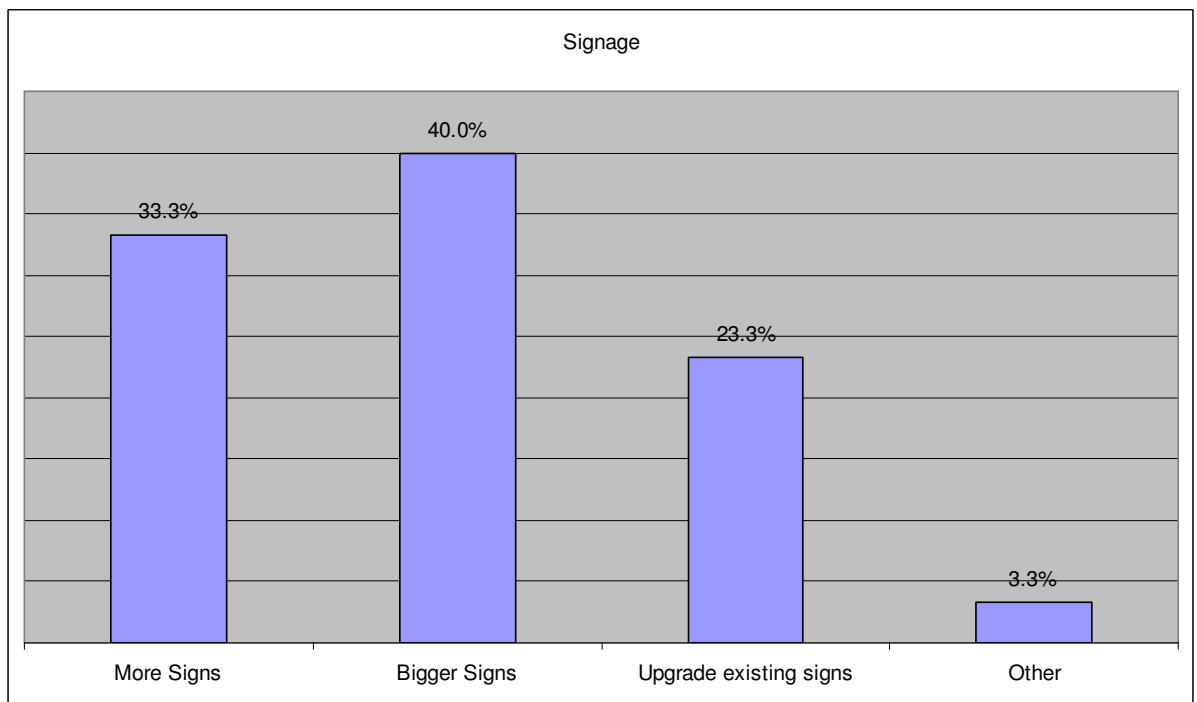
- 5.20 47.8% of drivers were happy with the provision for advertising on vehicles, 39.1% were not with 13% stating that they had no opinion.
- 5.21 Of the respondents stating a opinion, 14.3% wanted to see a decrease of advertising in PHV's, 57.1% would like to see advertising on hackney carriages increased, with 7.7% of respondents wanting to see advertising on hackneys reduced.21.4% of respondent stated a preference to increasing advertising on PHV's





Source: TPI

- 5.22 Drivers were also asked if they were happy with the signage provision at ranks. Of those who responded 26.1% were happy with the majority (69.6%) unhappy.
- 5.23 23.3% of respondents would like to see an upgrade to the signs at ranks, with 40% preferring bigger signs and 33.3% wanting more signs to ranks.



Source: TPI

- 5.24 Drivers were asked if they were aware of locations where ranks could be improved. 73.9% said that in their opinion there were locations where ranks could be improved, 13% said that there were no locations where ranks could be improved and 13% stated that they did not know. Locations included:

**Table 5.2 Locations for taxi rank improvements**

Location	Frequency
Grays (Station)	4
Lakeside Retail Park	8
Trine (Station)	1
Chafford Hundred (Station)	4
Market	1
Stanford Le Hope	1

Source: TPI

- 5.25 Drivers stated that better access, more signs and more spaces would improve the ranks at Lakeside and Grays, with drivers stating that the rank should be re-located outside the station at Chafford Hundred.
- 5.26 Drivers were asked if they were aware of locations where new taxi ranks were needed. 29.7% said yes, with 54.1% saying that they did not know of any locations where new ranks were needed and 16.2% stated that they did not know, or had no opinion. Locations included:

**Table 5.3 Locations for taxi ranks**

Location	Frequency
Morrisons – Grays	1
Stanford Le Hope	4
Ockendon	2
Tilbury	3
West Horndon	2
New Croydon Terminal	2
Lakeside Bus Station	3
Chafford Hundred	2
Lakeside Retail Park	4
All Stations (Bus and Rail)	2
All major supermarkets	3

Source: TPI

### **Key Stakeholder Consultation**

- 5.27 To inform the study of the views of the Hackney Carriage trade, private hire trade and other organisations, consultation was undertaken with a range of key stakeholders using by letter, emails, and phone.
- 5.28 The following individuals and organisations were contacted in writing for their views and given a questionnaire to complete and return.
- The departments for Strategic Planning – Transportation, Strategic Transport and Engineering and Transportation
  - Thurrock Council Passenger Transport Unit (transport)
  - The Local Constabulary
  - Thurrock Licensed Drivers Association
  - Groups representing Retail Associations, Business and Commerce in the City, i.e. the local Chamber of Commerce
  - Educational establishment
  - A range of transport stakeholders, e.g. rail/bus/coach providers and traffic managers

- Thurrock Residents Action Group
- Thurrock Local Enterprise Agency
- Student bodies/unions from universities and institutions of higher education in the Authority
- Groups representing people with disabilities in the Thurrock area.

5.29 Responses were received by

- Thurrock Council Passenger Transport Team
- Thurrock Enterprise Agency Ltd.
- Thameside Theatre, Grays

5.30 To gain further insight in to the trade emails were sent to councillors, but there were no responses.

5.31 Phone consultation was undertaken with

- The Local Constabulary
- Thurrock Council's Strategic Transport team with responsibility for the LTP
- Thurrock Council's Passenger Transport Team

#### **Community Safety Officer, Essex Police**

5.32 At present the community safety officer is not aware of any outstanding issues regarding the taxi trade in the area. PC Greener pointed out that the lack of a night club economy in the area has lead to little taxi demand after 9pm.

5.33 PC Greener did highlight unlicensed taxis as a potential problem for the future. He is aware of the increase of unlicensed taxis within the London area, and the close proximity of the Thurrock taxi trade. A suggestion of a distinctive bonnet colour has been made, but he understands that any discussion towards this is at a very early stage.

5.34 Although at present he is unaware of any unmet demand in the area he did highlighted the upcoming Olympic Games as a time when the demand for taxis in the Thurrock area may well increase.

#### **Team Leader, Passenger Transport Team, Thurrock Council**

5.35 Ms Ashwell mentioned that in her opinion there were no outstanding issues with taxis in the area. She mentioned that most of the taxis were operated as "one man bands" and that most of the drivers were on call much of the time.

5.36 Some of the bigger taxi operators had contracts for school transport. The passenger transport team has a select list of taxi operators which they can call on. Ms Ashwell stated "Passenger transport finds more students requiring transport, we find not always enough capacity to fulfil contracts. To delimit numbers would see my team not being able to transport pupils to school. "

5.37 Ms Ashwell also stated that she thought there were not enough wheelchair accessible vehicles in the area.

5.38 Ms Ashwell also mentioned that all taxi drivers were undergoing PATS training, and that, in her opinion, approximately 50% have already undergone some training. She

stated “Quality of drivers need improving, to ensure this a more stringent entrant test is required”

**Manager, Thameside Theatre, Orsett Rd, Grays**

- 5.39 Mr Mark Allinson stated that his customers use taxis, usually booking their journeys from the taxi operators office next door to the Theatre
- 5.40 He said “I don’t think theatre customers are comfortable going to the rather dubious looking office and shouting up the stairs. It would be better if there was a rank closer to the theatre but I can understand it would not pay. A phone system would be best”
- 5.41 He also said “I would like to see a proper space for parking taxis outside the theatre and I would prefer taxi drivers not to park in disabled parking bays.”

**Integrated Transport Officer, Strategic Transport, Sustainable Communities, Thurrock Council**

- 5.42 Mat Kiely mentioned that his department has been collating best value key performance indicators for Hackney Carriage and wheelchair accessible vehicles, with grants of up to £5000 being made available for drivers to convert to wheelchair accessible vehicles. Uptake of the scheme was very poor.
- 5.43 The work on KPI’s is not being continued with the introduction of their Long Term Transport Strategy (LTP3). Covering the next 3 years Mr. Kiely stated that although the LPT is looking to improve wheelchair accessibility in vehicles by looking to address improvement to access at taxi ranks and driver training, the strategy uses a scoring system to prioritise each scheme and determine how funding should be spent. In his views funding for the next trench of improvements through the LTP are likely to be allocated to road maintenance and safety schemes.
- 5.44 Mr. Kiely highlighted some sections of the LPT3 which mention the taxi trade for information

**Policy TTS8: Transport Interchange**

- 5.45 Improved connections between modes will be delivered at key interchanges, with priority given to improvements that facilitate better access to Strategic Employment Sites.
- 5.46 It is essential that this infrastructure is in place in order to promote sustainable growth and improve accessibility to key services and employment areas within the Borough. Rail stations in particular serve not just a local need, but function as gateways to the national rail network. High quality improvements will be a priority at interchanges critical for delivering sustainable growth, such as the rail stations at Grays Tilbury, Purfleet and Chafford Hundred.
- 5.47 A high priority will be further to improve interchange at Stanford Le Hope to improve access to London Gateway as the development is brought forward. At rail stations the Council will continue to work with the Train Operating Companies and Network Rail to deliver accessibility improvements both on the approach to and within stations. At key interchanges identified at rail stations there will be an emphasis on ensuring adequate facilities for those wishing to change mode. This means

provision of secure cycle storage, car parking facilities and taxi ranks, as well as high quality connecting bus services.

5.48 Improvements at interchanges will be delivered by:

- Enhancing personal security, particularly for people travelling after dark, by ensuring there is adequate lighting, good vista, provision of telephones, CCTV and the use of materials such as Perspex rather than glass, where necessary
- Improving the quality of infrastructure like timetables, provision of real-time passenger information, shelters and the availability of seating
- Ensuring facilities are fully accessible in accordance with the Disability Discrimination Act, for example by providing tactile paving, handrails and raised kerbs at boarding points
- Providing improved facilities such as cycle storage and lockers for those wishing to cycle to interchanges
- Upgrading walking and cycling routes from interchanges to the surrounding residential and employment areas to ensure they are safe and convenient for pedestrians and cyclists.
- Enhancing car parking at interchanges such as rail stations where necessary, with an emphasis on short term parking for dropping off or taxis
- Working to improve the coordination between bus and rail services
- Integrating transport improvements with wider developments and improvements to public space, such as the proposed Station Square development at Grays. This should help to create vibrant areas that provide a greater degree of informal surveillance and improve personal safety.

5.49 In the first instance an audit of interchanges will be carried out. This will enable us to develop a better understanding of the standard of current interchanges and the facilities provided. The Council will aim for all interchanges to be of a high standard and will produce a set of standards in order to develop a programme for delivery. These standards may include the provision of real-time information, cycle storage and the type of shelter or waiting facilities expected.

### **Policy TTS12: Travel Plans**

5.50 Travel plans will be required for all development in accordance with Government guidance. Large existing employers, employment areas and visitor attractions will also be encouraged and supported to develop travel plans. Where travel plans have been adopted, the Council will require an annual review to analyse effectiveness of delivery and overall contribution towards travel conditions.

### **Station Travel Plans**

5.51 Stations are major generators of travel and their impact on the surrounding road network can be large. Historically, there has been a strong emphasis in the rail industry on catering for car trips to stations through increasing station car parking and in some cases through parkway stations. In accordance with the Rail White Paper 2007, we will encourage Thurrock's rail stations to develop travel plans with a view to reducing congestion and encouraging more sustainable journeys to rail stations. As a result, we will work closely with our rail partners to deliver improvements required at rail stations to implement station travel plans, such as:

- Secure cycle storage and cycle hire
- Better pedestrian and cycle access to stations
- Better signing, information and waiting areas for buses and taxis

- New or improved bus services
- Car sharing and car clubs, with reserved and priority parking spaces
- Shared taxis
- Better managed station car parking to give priority to car sharing and where appropriate short-term drop-off parking rather than all-day

**Policy TTS21: Reducing Emissions from Transport**

5.52 The Council will work to deliver transport improvements aimed at reducing emissions from transport. To increase value for money, transport measures that reduce both greenhouse gas and air pollution emissions will be prioritised for action.

**Taxis**

5.53 The Council will work with taxi companies to encourage the use of low emission taxis throughout the Borough. This will include the investigation of financial incentives for taxi operators through licensing and business rates to promote:

- Alternative fuel use/conversion
- Replacement of vehicles with low carbon vehicles (in accordance with government classification)
- Retrofit pollution reduction equipment
- Eco-driving training for taxi drivers
- Engine switch off whilst waiting to pick up passengers

## 6.0 CONCLUSIONS

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### *Unmet Demand*

- 6.1 Based on rank observations the ISUD model shows a value of 0. As this is the lowest possible score and well below the threshold of 80, it is concluded that significant unmet demand for hackney carriages clearly does not exist in the Thurrock rank based market. This finding is supported by the relatively low level of excess demand to be found at ranks (4.1%) and that demand and supply is in equilibrium most (81%) of the time. Even at weekends excess demand occurs at most only 7% of time.
- 6.2 It is also supported by the on street survey of the general public, consultation with the trade and consultation with the majority of stakeholders undertaken, not only in terms of the rank based market but also in terms of the taxi market as a whole.
- 6.3 In the case of the former 84% of the general public considered the overall level of provision satisfactory and only around 7% considered there were not enough Hackneys. There were also just over a quarter (27.6%) of on street survey respondents that thought there were actually too many hackneys. Most respondents also considered the quality of services on offer to be good or very good.
- 6.4 Nearly 96% of trade respondents considered the supply of Hackneys and 87% the supply of PHVs was adequate. No taxi operators believed there was unmet demand at any time.
- 6.5 Only one stakeholder consulted suggested that they occasionally experienced a shortage of taxis, especially wheelchair accessible vehicles. This was in particular in relation to the contract market. None of the other stakeholders consulted had any concerns about unmet demand currently, although the Police did flag up the potential for a significant increase in demand around the time of the Olympics.
- 6.6 Asked specifically about the potential implications of increasing the number of taxis most operators were concerned that it would reduce their share of the market and consequently their income. Also that it may bring about a reduction in standards.

### *Other Significant Issues*

- 6.7 On average passengers waiting at a rank in Thurrock do so for only 0.45 minutes while the average waiting time for a hackney to pick up a passenger from a rank is 34 minutes. The longest average passenger waiting time for a hackney is 5 minutes at the St Johns Way rank in Corringham, a rank that is used on average by only 49 passengers a week. The longest average waiting time for a hackney to pick up a passenger is 98.82 minutes at the Crown Rd (station) rank in Grays, which is the second busiest rank in the area, serving on average 448 passengers a week.
- 6.8 The nature of the taxi market in Thurrock, in general, reflects that found nationally, apart from flagdowns. Based on feedback from operators 36% of demand is said to come from ranks, 33% from telephone bookings and 26% from contract work. Only 5% of the demand comes from people flagging down the taxi in the street. Most drivers say they need to work 6 days a week and some 7 days. Fridays appear to be the busiest day and Sundays and Mondays the least busy. Most drivers consulted were owner operators, while a third shared their vehicle with another driver. Currently only 20% of the hackney fleet is made up of wheelchair accessible vehicles.

- 6.9 In Thurrock by far the majority of taxi journeys undertaken by respondents to the on street survey were for leisure purposes (62.5%). When asked what improvements in provision they would like to see survey respondents highlighted cheaper fares (55.3%), and more ranks (13.3%). Asked what limited their use of taxis, most respondents said they preferred to use other modes (49%) or had no need for them (33%). In this case cost was identified as a factor by only 13% of respondents.
- 6.10 Asked where they would like to see new ranks the most common suggestion of on street survey respondents was outside Morrisons. There were also some who suggested a rank was needed at Chafford Hundred rail station, despite there already being a rank located there. Taxi Operators sought new ranks at Stanford le Hope (4) and Lakeside Retail Park (4). Improvements to ranks were sought by the trade at Lakeside Retail Park (8), Grays Station (4) and Chafford Hundred Station (4), with signage being the most important consideration. The Integrated Transport Unit of the Council identified a desire to use LTP3 to improve access to taxi infrastructure, especially at transport interchanges, although indicated that this may not be regarded as a high priority.
- 6.11 The on street survey highlighted some misunderstanding or lack of knowledge amongst the general public about which type of taxi could undertake what functions, with nearly a third of respondents believing it was legal for PHVs to pick up at a rank or respond to flag downs in the street. The police also highlighted their concerns that the number of unlicensed taxis operating in the area could increase in the future as this is happening now in London and could spread.
- 6.12 The taxi operators consulted identified concerns about drivers knowledge, in particular the need for improved language skills (30%), to improve testing (27%) and to improve geographic knowledge (24%). They would also like to see increased opportunities for advertising (57%), enforcement activity (33%) and an improved complaints procedure (27%). There were over 81% of operators that believed greener fuel promotion should be undertaken. However, most saw this as the responsibility of government (55%) with only 5% believing it to be the responsibility of operators themselves.



## 7.0 OPTIONS & RECOMMENDATIONS

### Options

7.1 In the absence of any significant unmet demand the Council can currently choose to:

- maintain its limit at the current level of Hackney Carriage licences;
- issue that number of Hackney Carriage licences as it sees fit (in one or in stages); or
- remove the current limit on Hackney Carriages (de-limitation)

7.2 The choice of policy is ultimately a political decision and TPi therefore, does not make any specific recommendations in this report on which option the Council should choose. However, for information we provide below a summary of some of the key positive and negative impacts that need to be taken into account when making the choices available:

Option	Positives	Negatives
Maintain the current limit on hackney licenses	<p>Most closely meets the preference of local consultation</p> <p>Most likely to sustain operator viability</p> <p>Most likely to maintain service quality</p> <p>No disruption in provision</p>	<p>Little scope for increased provision</p> <p>Least likely to encourage improvements in service provision</p> <p>Sustains the current 'premium' on hackney licenses</p>
Increase the current limit on hackney licenses (in one)	<p>Closely meets thrust of regional policy</p> <p>Provides for the impact on operator viability to be limited</p> <p>Can maintain or improve service quality through entry standards and controls</p> <p>Can address demand for more accessible taxis</p> <p>Can meet some demands for increased vehicle provision and market entry</p> <p>Can allow specific entry requirements to be placed alongside the new licenses available</p> <p>Continues regulation while allowing for growth in operations</p>	<p>Requires operators to incur costs of changing or obtaining new vehicles</p> <p>Offers neither the benefits of retaining a limit or of deregulating</p> <p>Maintains the possibility of a court challenge by both those who do not think there should be a limit and those that do not wish to see it removed</p> <p>Increasing the limit requires further study to establish by how much it should be raised. This will require modelling of the elasticity of demand for new ranks and calculating the extent of other latent demand.</p> <p>Increasing the limit in one go risks introducing too many hackneys if the above calculations prove inaccurate</p>
Increase the current limit on hackney licenses (in stages)	<p>Most closely meets thrust of regional policy</p> <p>Provides for a controlled increase in hackney numbers</p> <p>Can maintain or improve</p>	<p>Requires operators to incur costs of changing or obtaining new vehicles</p> <p>Offers neither the benefits of retaining a limit or of deregulating</p> <p>Maintains the possibility of a court challenge by both those who do not think</p>

Option	Positives	Negatives
	<p>service quality through entry standards and controls</p> <p>Can address demand for more accessible taxis</p> <p>Can meet some demands for increased vehicle provision and market entry, over time</p> <p>Can allow specific entry requirements to be placed alongside the new licenses available and improved/ changed at each issue</p> <p>Continues regulation while allowing for controlled growth in operations</p> <p>Increasing the limit in stages negates the need for detailed further study to establish by how much it should be raised, as long as impacts of each increase are monitored</p> <p>Avoids the risk of over supply to the market</p> <p>Can be used as a 'stepping stone' towards deregulation</p>	<p>there should be a limit and those that do not wish to see it removed</p> <p>Will take time to bring about any service improvements and market growth.</p>
<p>Remove the limit on hackney licenses</p>	<p>Most closely meets thrust of national policy</p> <p>Most likely to bring consumer benefits</p> <p>Assuming transfer of PHVs to hackneys, most likely to increase hackney and reduce PHV numbers bringing vehicle mix more in line with the national average</p> <p>Most likely to meet the demands of those consulted who sought increased numbers of taxis or opportunities for market entry (ie drivers on the waiting list, 50% of drivers leasing a vehicle)</p> <p>No need for costly unmet demand surveys to be undertaken every 3 years</p> <p>Can lead to reduced fares</p>	<p>May generate excessive competition for prime demand (ie as the 'bus wars' that developed following the 1985 transport ACT)</p> <p>May cause a reduction in service quality</p> <p>Can be disruptive to markets until new arrangements are understood</p> <p>Can require substantial administration and enforcement effort until markets and the trade settle</p> <p>New licence holders cannot easily be required to serve particular or new aspects of the taxi market</p> <p>Can lead to a reduction in the viability/sustainability of operators</p>

## **Recommendations**

### **It is recommended that:**

- Based on our analyses, Thurrock Council has the discretion to either:
  - i) maintain the limit at the current level of Hackney licences;
  - ii) issue that number of Hackney Carriage licences as it sees fit; or
  - iii) remove the current limit on Hackney Carriages (de-limitation)
- If there is to be any change, to the current policy, this should be considered in the light of the latest DfT guidance to licensing authorities and the outcome of government considerations of the section on taxis in the Single Equalities Act, once this becomes available.
- That consideration is given to the desire of on-street survey respondents for a new rank to be located by Morrisons, and of taxi operators for improvements to signage at ranks, especially at Station ranks. The opportunity to obtain support for this through LTP3 should be discussed with the Council Integrated Transport Unit.
- The Council should consider, in conjunction with the Police, organising a campaign to raise awareness of the difference between the respective roles of hackney carriages and PHV's and of the potential dangers of use of unlicensed taxis.
- There should be further detailed consultation with taxi operators to examine how it might be possible to increase opportunities for advertising, greener fuel promotion, enforcement, the provision of accessible vehicles and improve entry testing, in particular in relation to language skills and geographic knowledge.
- The anticipated useful life of the current survey is three years and we would recommend a further survey in Autumn 2013, in line with current Government guidance
- Future Transport Strategies and policy documents should take account of this report.

**APPENDIX 1**

**DfT Guidance 2006**

## **TAXI AND PRIVATE HIRE VEHICLE LICENSING: BEST PRACTICE GUIDANCE**

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**Annex A - Useful questions when assessing quantity controls**

**Annex B - Sample notice between taxi/PHV driver and passenger**

**Annex C – Assessing applicants for a taxi or PHV driver licence in accordance with C1 standard**

## **INTRODUCTION**

1. The Department first issued Best Practice Guidance in October 2006 to assist those local authorities in England and Wales that have responsibility for the regulation of the taxi and private hire vehicle (PHV) trades.
2. It is clear that many licensing authorities considered their licensing policies in the context of the Guidance. That is most encouraging.
3. However, in order to keep our Guidance relevant and up to date, we embarked on a revision. We took account of feedback from the initial version and we consulted stakeholders in producing this revised version.
4. The key premise remains the same - it is for individual licensing authorities to reach their own decisions both on overall policies and on individual licensing matters, in the light of their own views of the relevant considerations. This Guidance is intended to assist licensing authorities but it is only guidance and decisions on any matters remain a matter for the authority concerned.
5. We have not introduced changes simply for the sake of it. Accordingly, the bulk of the Guidance is unchanged. What we have done is focus on issues involving a new policy (for example trailing the introduction of the Safeguarding Vulnerable Groups legislation); or where we consider that the advice could be elaborated (eg enforcement); or where progress has been made since October 2006 (eg the stretched limousine guidance note has now been published).

### **THE ROLE OF TAXIS AND PHVs**

6. Taxis (more formally known as hackney carriages) and PHVs (or minicabs as some of them are known) play an important part in local transport. In 2008, the average person made 11 trips in taxis or private hire vehicles. Taxis and PHVs are used by all social groups; low-income young women (amongst whom car ownership is low) are one of the largest groups of users.
7. Taxis and PHVs are also increasingly used in innovative ways - for example as taxi-buses - to provide innovative local transport services (see paras 92-95)

### **THE ROLE OF LICENSING: POLICY JUSTIFICATION**

8. The aim of local authority licensing of the taxi and PHV trades is to protect the public. Local licensing authorities will also be aware that the public should have reasonable access to taxi and PHV services, because of the part they play in local transport provision. Licensing requirements which are unduly stringent will tend unreasonably to restrict the supply of taxi and PHV services, by putting up the cost of operation or otherwise restricting entry to the trade. Local licensing authorities should recognise that too restrictive an approach can work against the public interest – and can, indeed, have safety implications.

9. For example, it is clearly important that somebody using a taxi or PHV to go home alone late at night should be confident that the driver does not have a criminal record for assault and that the vehicle is safe. But on the other hand, if the supply of taxis or PHVs has been unduly constrained by onerous licensing conditions, then that person's safety might be put at risk by having to wait on late-night streets for a taxi or PHV to arrive; he or she might even be tempted to enter an unlicensed vehicle with an unlicensed driver illegally plying for hire.

10. Local licensing authorities will, therefore, want to be sure that each of their various licensing requirements is in proportion to the risk it aims to address; or, to put it another way, whether the cost of a requirement in terms of its effect on the availability of transport to the public is at least matched by the benefit to the public, for example through increased safety. This is not to propose that a detailed, quantitative, cost-benefit assessment should be made in each case; but it is to urge local licensing authorities to look carefully at the costs – financial or otherwise – imposed by each of their licensing policies. It is suggested they should ask themselves whether those costs are really commensurate with the benefits a policy is meant to achieve.

### **SCOPE OF THE GUIDANCE**

11. This guidance deliberately does not seek to cover the whole range of possible licensing requirements. Instead it seeks to concentrate only on those issues that have caused difficulty in the past or that seem of particular significance. Nor for the most part does the guidance seek to set out the law on taxi and PHV licensing, which for England and Wales contains many complexities. Local licensing authorities will appreciate that it is for them to seek their own legal advice.

### **CONSULTATION AT THE LOCAL LEVEL**

12. It is good practice for local authorities to consult about any significant proposed changes in licensing rules. Such consultation should include not only the taxi and PHV trades but also groups likely to be the trades' customers. Examples are groups representing disabled people, or Chambers of Commerce, organisations with a wider transport interest (eg the Campaign for Better Transport and other transport providers), womens' groups or local traders.

### **ACCESSIBILITY**

13. The Minister of State for Transport has now announced the way forward on accessibility for taxis and PHVs. His statement can be viewed on the Department's web-site at: <http://www.dft.gov.uk/press/speechesstatements/statements/accesstotaxis>. The Department will be taking forward demonstration schemes in three local authority areas to research the needs of people with disabilities in order to produce guidance about the most appropriate provision. In the meantime, the Department recognises that some local licensing authorities will want to make progress on enhancing accessible taxi provision and the guidance outlined below constitutes the Department's advice on how this might be achieved in advance of the comprehensive and dedicated guidance which will arise from the demonstration schemes.

14. Different accessibility considerations apply between taxis and PHVs. Taxis can be hired on the spot, in the street or at a rank, by the customer dealing directly with a driver. PHVs can only be booked through an operator. It is important that a disabled person should be able to hire a taxi on the spot with the minimum delay or inconvenience, and having accessible taxis available helps to make that possible. For PHVs, it may be more appropriate for a local authority to license any type of saloon car, noting that some PHV operators offer accessible vehicles in their fleet. The Department has produced a leaflet on the ergonomic requirements for accessible taxis that is available from: <http://www.dft.gov.uk/transportforyou/access/taxis/pubs/research>

15. The Department is aware that, in some cases, taxi drivers are reluctant to pick up disabled people. This may be because drivers are unsure about how to deal with disabled people, they believe it will take longer for disabled people to get in and out of the taxi and so they may lose other fares, or they are unsure about insurance arrangements if anything goes wrong. It should be remembered that this is no excuse for refusing to pick up disabled people and that the taxi industry has a duty to provide a service to disabled people in the same way as it provides a service to any other passenger. Licensing authorities should do what they can to work with operators, drivers and trade bodies in their area to improve drivers' awareness of the needs of disabled people, encourage them to overcome any reluctance or bad practice, and to improve their abilities and confidence. Local licensing authorities should also encourage their drivers to undertake disability awareness training, perhaps as part of the course mentioned in the training section of this guidance that is available through Go-Skills.

16. In relation to enforcement, licensing authorities will know that section 36 of the Disability Discrimination Act 1995 (DDA) was partially commenced by enactment of the Local Transport Act 2008. The duties contained in this section of the DDA apply only to those vehicles deemed accessible by the local authority being used on "taxibus" services. This applies to both hackney carriages and private hire vehicles.

17. Section 36 imposes certain duties on drivers of "taxibuses" to provide assistance to people in wheelchairs, to carry them in safety and not to charge extra for doing so. Failure to abide by these duties could lead to prosecution through a Magistrates' court and a maximum fine of £1,000.

18. Local authorities can take action against non-taxibus drivers who do not abide by their duties under section 36 of the DDA (see below). This could involve for example using licence conditions to implement training requirements or, ultimately, powers to suspend or revoke licences. Some local authorities use points systems and will take certain enforcement actions should drivers accumulate a certain number of points

19. There are plans to modify section 36 of the DDA. The Local Transport Act 2008 applied the duties to assist disabled passengers to drivers of taxis and PHVs whilst being used to provide local services. The Equality Bill which is currently on its passage through Parliament would extend the duties to drivers of taxis and PHVs whilst operating conventional services using wheelchair accessible vehicles. Licensing authorities will be informed if the change is enacted and Regulations will have to be made to deal with exemptions from the duties for drivers who are unable, on medical grounds to fulfil the duties.



### **Duties to carry assistance dogs**

20. Since 31 March 2001, licensed taxi drivers in England and Wales have been under a duty (under section 37 of the DDA) to carry guide, hearing and other prescribed assistance dogs in their taxis without additional charge. Drivers who have a medical condition that is aggravated by exposure to dogs may apply to their licensing authority for an exemption from the duty on medical grounds. Any other driver who fails to comply with the duty could be prosecuted through a Magistrates' court and is liable to a fine of up to £1,000. Similar duties covering PHV operators and drivers have been in force since 31 March 2004.

21. Enforcement of this duty is the responsibility of local licensing authorities. It is therefore for authorities to decide whether breaches should be pursued through the courts or considered as part of the licensing enforcement regime, having regard to guidance issued by the Department.

<http://www.dft.gov.uk/transportforyou/access/taxis/pubs/taxis/carriageofassistancedogsinta6154?page=2>

### **Duties under the Part 3 of the DDA**

22. The Disability Discrimination Act 2005 amended the DDA 1995 and lifted the exemption in Part 3 of that Act for operators of transport vehicles. Regulations applying Part 3 to vehicles used to provide public transport services, including taxis and PHVs, hire services and breakdown services came into force on 4 December 2006. Taxi drivers now have a duty to ensure disabled people are not discriminated against or treated less favourably. In order to meet these new duties, licensing authorities are required to review any practices, policies and procedures that make it impossible or unreasonably difficult for a disabled person to use their services.

23. The Disability Rights Commission, before it was incorporated into the Equality and Human Rights Commission, produced a Code of Practice to explain the Part 3 duties for the transport industry; this is available at <http://drc.uat.room.net/PDF/4008-517-provisionanduseoftransportvehiclesscop.pdf>. There is an expectation that Part 3 duties also now demand new skills and training; this is available through GoSkills, the sector skills council for road passenger transport. Go-Skills has also produced a DVD about assisting disabled passengers. Further details are provided in the training section of this guidance.

24. Local Authorities may wish to consider how to use available courses to re-enforce the duties drivers are required to discharge under section 3 of DDA, and also to promote customer service standards for example through GoSkills.

25. In addition recognition has been made of a requirement of basic skills prior to undertaking any formal training. On-line tools are available to assess this requirement prior to undertaking formal training.

## **VEHICLES**

### **Specification Of Vehicle Types That May Be Licensed**

26. The legislation gives local authorities a wide range of discretion over the types of vehicle that they can license as taxis or PHVs. Some authorities specify conditions that in practice can only be met by purpose-built vehicles but the majority license a range of vehicles.

27. Normally, the best practice is for local licensing authorities to adopt the principle of specifying as many different types of vehicle as possible. Indeed, local authorities might usefully set down a range of general criteria, leaving it open to the taxi and PHV trades to put forward vehicles of their own choice which can be shown to meet those criteria. In that way there can be flexibility for new vehicle types to be readily taken into account.

28. It is suggested that local licensing authorities should give very careful consideration to a policy which automatically rules out particular types of vehicle or prescribes only one type or a small number of types of vehicle. For example, the Department believes authorities should be particularly cautious about specifying only purpose-built taxis, with the strict constraint on supply that that implies. But of course the purpose-built vehicles are amongst those which a local authority could be expected to license. Similarly, it may be too restrictive to automatically rule out considering Multi-Purpose Vehicles, or to license them for fewer passengers than their seating capacity (provided of course that the capacity of the vehicle is not more than eight passengers).

29. The owners and drivers of vehicles may want to make appropriate adaptations to their vehicles to help improve the personal security of the drivers. Licensing authorities should look favourably on such adaptations, but, as mentioned in paragraph 35 below, they may wish to ensure that modifications are present when the vehicle is tested and not made after the testing stage.

#### **Tinted windows**

30. The minimum light transmission for glass in front of, and to the side of, the driver is 70%. Vehicles may be manufactured with glass that is darker than this fitted to windows rearward of the driver, especially in estate and people carrier style vehicles. When licensing vehicles, authorities should be mindful of this as well as the large costs and inconvenience associated with changing glass that conforms to both Type Approval and Construction and Use Regulations.

#### **Imported vehicles: type approval (see also “stretched limousines”, paras 40-44 below)**

31. It may be that from time to time a local authority will be asked to license as a taxi or PHV a vehicle that has been imported independently (that is, by somebody other than the manufacturer). Such a vehicle might meet the local authority's criteria for licensing, but the local authority may nonetheless be uncertain about the wider rules for foreign vehicles being used in the UK. Such vehicles will be subject to the 'type approval' rules. For

passenger cars up to 10 years old at the time of first GB registration, this means meeting the technical standards of either:

- a European Whole Vehicle Type approval;
- a British National Type approval; or
- a Individual Vehicle Approval.

Most registration certificates issued since late 1998 should indicate the approval status of the vehicle. The technical standards applied (and the safety and environmental risks covered) under each of the above are proportionate to the number of vehicles entering service. Further information about these requirements and the procedures for licensing and registering imported vehicles can be seen at [www.businesslink.gov.uk/vehicleapprovalschemes](http://www.businesslink.gov.uk/vehicleapprovalschemes)

### **Vehicle Testing**

32. There is considerable variation between local licensing authorities on vehicle testing, including the related question of age limits. The following can be regarded as best practice:

**Frequency Of Tests.** The legal requirement is that all taxis should be subject to an MOT test or its equivalent once a year. For PHVs the requirement is for an annual test after the vehicle is three years old. An annual test for licensed vehicles of whatever age (that is, including vehicles that are less than three years old) seems appropriate in most cases, unless local conditions suggest that more frequent tests are necessary. However, more frequent tests may be appropriate for older vehicles (see 'age limits' below). Local licensing authorities may wish to note that a review carried out by the National Society for Cleaner Air in 2005 found that taxis were more likely than other vehicles to fail an emissions test. This finding, perhaps suggests that emissions testing should be carried out on ad hoc basis and more frequently than the full vehicle test.

**Criteria For Tests.** Similarly, for mechanical matters it seems appropriate to apply the same criteria as those for the MOT test to taxis and PHVs\*. The MOT test on vehicles first used after 31 March 1987 includes checking of all seat belts. However, taxis and PHVs provide a service to the public, so it is also appropriate to set criteria for the internal condition of the vehicle, though these should not be unreasonably onerous.

\*A manual outlining the method of testing and reasons for failure of all MOT tested items can be obtained from the Stationary Office see <http://www.tsoshop.co.uk/bookstore.asp?FO=1159966&Action=Book&From=SearchResults&ProductID=0115525726>

**Age Limits.** It is perfectly possible for an older vehicle to be in good condition. So the setting of an age limit beyond which a local authority will not license vehicles may be arbitrary and inappropriate. But a greater frequency of testing may be appropriate for older vehicles - for example, twice-yearly tests for vehicles more than five years old.

Number Of Testing Stations. There is sometimes criticism that local authorities provide only one testing centre for their area (which may be geographically extensive). So it is good practice for local authorities to consider having more than one testing station. There could be an advantage in contracting out the testing work, and to different garages. In that way the licensing authority can benefit from competition in costs. (The Vehicle Operators and Standards Agency – VOSA – may be able to assist where there are local difficulties in provision of testing stations.)

33. The Technical Officer Group of the Public Authority Transport Network has produced Best Practice Guidance which focuses on national inspection standards for taxis and PHVs. Local licensing authorities might find it helpful to refer to the testing standards set out in this guidance in carrying out their licensing responsibilities. The PATN can be accessed via the Freight Transport Association.

### **Personal security**

34. The personal security of taxi and PHV drivers and staff needs to be considered. The Crime and Disorder Act 1998 requires local authorities and others to consider crime and disorder reduction while exercising all of their duties. Crime and Disorder Reduction Partnerships are also required to invite public transport providers and operators to participate in the partnerships. Research has shown that anti-social behaviour and crime affects taxi and PHV drivers and control centre staff. It is therefore important that the personal security of these people is considered.

35. The owners and drivers of vehicles will often want to install security measures to protect the driver. Local licensing authorities may not want to insist on such measures, on the grounds that they are best left to the judgement of the owners and drivers themselves. But it is good practice for licensing authorities to look sympathetically on - or actively to encourage - their installation. They could include a screen between driver and passengers, or CCTV. Care however should be taken that security measures within the vehicle do not impede a disabled passenger's ability to communicate with the driver. In addition, licensing authorities may wish to ensure that such modifications are present when the vehicle is tested and not made after the testing stage.

36. There is extensive information on the use of CCTV, including as part of measures to reduce crime, on the Home Office website (e.g. [www.crimereduction.homeoffice.gov.uk/cctv/cctvminisite25.htm](http://www.crimereduction.homeoffice.gov.uk/cctv/cctvminisite25.htm), and <http://scienceandresearch.homeoffice.gov.uk/hosdb/cctv-imaging-technology/CCTV-and-imaging-publications>) and on the Information Commission's Office website ([www.ico.gov.uk](http://www.ico.gov.uk)). CCTV can be both a deterrent to would-be trouble makers and be a source of evidence in the case of disputes between drivers and passengers and other incidents. There is a variety of funding sources being used for the implementation of security measures for example, from community safety partnerships, local authorities and drivers themselves.

37. Other security measures include guidance, talks by the local police and conflict avoidance training. The Department has recently issued guidance for taxi and PHV drivers to help them improve their personal security. These can be accessed on the Department's website at: <http://www.dft.gov.uk/pgr/crime/taxiphv/>.

In order to emphasise the reciprocal aspect of the taxi/PHV service, licensing authorities might consider drawing up signs or notices which set out not only what passengers can expect from drivers, but also what drivers can expect from passengers who use their service. Annex B contains two samples which are included for illustrative purposes but local authorities are encouraged to formulate their own, in the light of local conditions and circumstances. Licensing authorities may want to encourage the taxi and PHV trades to build good links with the local police force, including participation in any Crime and Disorder Reduction Partnerships.

### **Vehicle Identification**

38. Members of the public can often confuse PHVs with taxis, failing to realise that PHVs are not available for immediate hire and that a PHV driver cannot be hailed. So it is important to distinguish between the two types of vehicle. Possible approaches might be:

a licence condition that prohibits PHVs from displaying any identification at all apart from the local authority licence plate or disc. The licence plate is a helpful indicator of licensed status and, as such, it helps identification if licence plates are displayed on the front as well as the rear of vehicles. However, requiring some additional clearer form of identification can be seen as best practice. This is for two reasons: firstly, to ensure a more positive statement that the vehicle cannot be hired immediately through the driver; and secondly because it is quite reasonable, and in the interests of the travelling public, for a PHV operator to be able to state on the vehicle the contact details for hiring;

a licence condition which requires a sign on the vehicle in a specified form. This will often be a sign of a specified size and shape which identifies the operator (with a telephone number for bookings) and the local licensing authority, and which also has some words such as 'pre-booked only'. This approach seems the best practice; it identifies the vehicle as private hire and helps to avoid confusion with a taxi, but also gives useful information to the public wishing to make a booking. It is good practice for vehicle identification for PHVs to include the contact details of the operator.

Another approach, possibly in conjunction with the previous option, is a requirement for a roof-mounted, permanently illuminated sign with words such as 'pre-booked only'. But it can be argued that any roof-mounted sign, however unambiguous its words, is liable to create confusion with a taxi. So roof-mounted signs on PHVs are not seen as best practice.

### **Environmental Considerations**

39. Local licensing authorities, in discussion with those responsible for environmental health issues, will wish to consider how far their vehicle licensing policies can and should support any local environmental policies that the local authority may have adopted. This will be of particular importance in designated Air Quality Management Areas (AQMAs), Local authorities may, for example, wish to consider setting vehicle emissions standards for taxis and PHVs. However, local authorities would need to carefully and thoroughly

assess the impact of introducing such a policy; for example, the effect on the supply of taxis and PHVs in the area would be an important consideration in deciding the standards, if any, to be set. They should also bear in mind the need to ensure that the benefits of any policies outweigh the costs (in whatever form).

### **Stretched Limousines**

40. Local licensing authorities are sometimes asked to license stretched limousines as PHVs. It is suggested that local authorities should approach such requests on the basis that these vehicles – where they have fewer than nine passenger seats - have a legitimate role to play in the private hire trade, meeting a public demand. Indeed, the Department's view is that it is not a legitimate course of action for licensing authorities to adopt policies that exclude limousines as a matter of principle and that any authorities which do adopt such practices are leaving themselves open to legal challenge. A policy of excluding limousines creates an unacceptable risk to the travelling public, as it would inevitably lead to higher levels of unlawful operation. Public safety considerations are best supported by policies that allow respectable, safe operators to obtain licences on the same basis as other private hire vehicle operators. The Department has now issued guidance on the licensing arrangements for stretched limousines. This can be accessed on the Department's web-site at <http://www.dft.gov.uk/pgr/regional/taxis/stretchlimousines.pdf>.

41. The limousine guidance makes it clear that most operations are likely to fall within the PHV licensing category and not into the small bus category. VOSA will be advising limousine owners that if they intend to provide a private hire service then they should go to the local authority for PHV licences. The Department would expect licensing authorities to assess applications on their merits; and, as necessary, to be proactive in ascertaining whether any limousine operators might already be providing an unlicensed service within their district.

42. Imported stretched limousines were historically checked for compliance with regulations under the Single Vehicle Approval (SVA) inspection regime before they were registered. This is now the Individual Vehicle Approval (IVA) scheme. The IVA test verifies that the converted vehicle is built to certain safety and environmental standards. A licensing authority might wish to confirm that an imported vehicle was indeed tested by VOSA for IVA before being registered and licensed (taxed) by DVLA. This can be done either by checking the V5C (Registration Certificate) of the vehicle, which may refer to IVA under the "Special Note" section; or by writing to VOSA, Ellipse, Padley Road, Swansea, SA1 8AN, including details of the vehicle's make and model, registration number and VIN number.

43. Stretched limousines which clearly have more than 8 passenger seats should not of course be licensed as PHVs because they are outside the licensing regime for PHVs. However, under some circumstances the SVA regime accepted vehicles with space for more than 8 passengers, particularly where the precise number of passenger seats was hard to determine. In these circumstances, if the vehicle had obtained an SVA certificate, the authority should consider the case on its merits in deciding whether to license the vehicle under the strict condition that the vehicle will not be used to carry more than 8 passengers, bearing in mind that refusal may encourage illegal private hire operation.

44. Many councils are concerned that the size of limousines prevents them being tested in conventional MoT garages. If there is not a suitable MoT testing station in the area then it would be possible to test the vehicle at the local VOSA test stations. The local enforcement office may be able to advise (contact details on <http://www.vosa.gov.uk/vosa/vosalocations/vosaenforcementoffices.htm>).

#### **QUANTITY RESTRICTIONS OF TAXI LICENCES OUTSIDE LONDON**

45. The present legal provision on quantity restrictions for taxis outside London is set out in section 16 of the Transport Act 1985. This provides that the grant of a taxi licence may be refused, for the purpose of limiting the number of licensed taxis 'if, but only if, the [local licensing authority] is satisfied that there is no significant demand for the services of hackney carriages (within the area to which the licence would apply) which is unmet'.

46. Local licensing authorities will be aware that, in the event of a challenge to a decision to refuse a licence, the local authority concerned would have to establish that it had, reasonably, been satisfied that there was no significant unmet demand.

47. Most local licensing authorities do not impose quantity restrictions; the Department regards that as best practice. Where restrictions are imposed, the Department would urge that the matter should be regularly reconsidered. The Department further urges that the issue to be addressed first in each reconsideration is whether the restrictions should continue at all. It is suggested that the matter should be approached in terms of the interests of the travelling public - that is to say, the people who use taxi services. What benefits or disadvantages arise for them as a result of the continuation of controls; and what benefits or disadvantages would result for the public if the controls were removed? Is there evidence that removal of the controls would result in a deterioration in the amount or quality of taxi service provision?

48. In most cases where quantity restrictions are imposed, vehicle licence plates command a premium, often of tens of thousands of pounds. This indicates that there are people who want to enter the taxi market and provide a service to the public, but who are being prevented from doing so by the quantity restrictions. This seems very hard to justify.

49. If a local authority does nonetheless take the view that a quantity restriction can be justified in principle, there remains the question of the level at which it should be set, bearing in mind the need to demonstrate that there is no significant unmet demand. This issue is usually addressed by means of a survey; it will be necessary for the local licensing authority to carry out a survey sufficiently frequently to be able to respond to any challenge to the satisfaction of a court. An interval of three years is commonly regarded as the maximum reasonable period between surveys.

50. As to the conduct of the survey, the Department's letter of 16 June 2004 set out a range of considerations. But key points are:

**the length of time that would-be customers have to wait at ranks.** However, this alone is an inadequate indicator of demand; also taken into account should be...

**waiting times for street hailings and for telephone bookings.** But waiting times at ranks or elsewhere do not in themselves satisfactorily resolve the question of unmet demand. It is also desirable to address...

**latent demand,** for example people who have responded to long waiting times by not even trying to travel by taxi. This can be assessed by surveys of people who do not use taxis, perhaps using stated preference survey techniques.

**peaked demand.** It is sometimes argued that delays associated only with peaks in demand (such as morning and evening rush hours, or pub closing times) are not 'significant' for the purpose of the Transport Act 1985. The Department does not share that view. Since the peaks in demand are by definition the most popular times for consumers to use taxis, it can be strongly argued that unmet demand at these times should not be ignored. Local authorities might wish to consider when the peaks occur and who is being disadvantaged through restrictions on provision of taxi services.

**consultation.** As well as statistical surveys, assessment of quantity restrictions should include consultation with all those concerned, including user groups (which should include groups representing people with disabilities, and people such as students or women), the police, hoteliers, operators of pubs and clubs and visitor attractions, and providers of other transport modes (such as train operators, who want taxis available to take passengers to and from stations);

**publication.** All the evidence gathered in a survey should be published, together with an explanation of what conclusions have been drawn from it and why. If quantity restrictions are to be continued, their benefits to consumers and the reason for the particular level at which the number is set should be set out.

**financing of surveys.** It is not good practice for surveys to be paid for by the local taxi trade (except through general revenues from licence fees). To do so can call in question the impartiality and objectivity of the survey process.

51. Quite apart from the requirement of the 1985 Act, the Department's letter of 16 June 2004 asked all local licensing authorities that operate quantity restrictions to review their policy and justify it publicly by 31 March 2005 and at least every three years thereafter. The Department also expects the justification for any policy of quantity restrictions to be included in the Local Transport Plan process. A recommended list of questions for local authorities to address when considering quantity controls was attached to the Department's letter. (The questions are listed in Annex A to this Guidance.)

## **TAXI FARES**

52. Local licensing authorities have the power to set taxi fares for journeys within their area, and most do so. (There is no power to set PHV fares.) Fare scales should be designed with a view to practicality. The Department sees it as good practice to review the fare scales at regular intervals, including any graduation of the fare scale by time of



day or day of the week. Authorities may wish to consider adopting a simple formula for deciding on fare revisions as this will increase understanding and improve the transparency of the process. The Department also suggests that in reviewing fares authorities should pay particular regard to the needs of the travelling public, with reference both to what it is reasonable to expect people to pay but also to the need to give taxi drivers sufficient incentive to provide a service when it is needed. There may well be a case for higher fares at times of higher demand.

53. Taxi fares are a maximum, and in principle are open to downward negotiation between passenger and driver. It is not good practice to encourage such negotiations at ranks, or for on-street hailings; there would be risks of confusion and security problems. But local licensing authorities can usefully make it clear that published fares are a maximum, especially in the context of telephone bookings, where the customer benefits from competition. There is more likely to be a choice of taxi operators for telephone bookings, and there is scope for differentiation of services to the customer's advantage (for example, lower fares off-peak or for pensioners).

54. There is a case for allowing any taxi operators who wish to do so to make it clear – perhaps by advertising on the vehicle – that they charge less than the maximum fare; publicity such as '5% below the metered fare' might be an example.

## **DRIVERS**

### **Duration Of Licences**

55. It is obviously important for safety reasons that drivers should be licensed. But it is not necessarily good practice to require licences to be renewed annually. That can impose an undue burden on drivers and licensing authorities alike. Three years is the legal maximum period and is in general the best approach. One argument against 3-year licences has been that a criminal offence may be committed, and not notified, during the duration of the licence. But this can of course also be the case during the duration of a shorter licence. In relation to this, authorities will wish to note that the Home Office in April 2006 issued revised guidance for police forces on the Notifiable Occupations Scheme. Paragraphs 62-65 below provide further information about this scheme.

56. However, an annual licence may be preferred by some drivers. That may be because they have plans to move to a different job or a different area, or because they cannot easily pay the fee for a three-year licence, if it is larger than the fee for an annual one. So it can be good practice to offer drivers the choice of an annual licence or a three-year licence.

### **Acceptance of driving licences from other EU member states**

57. Sections 51 and 59 of the Local Government (Miscellaneous Provisions) Act 1976 as enacted stated that an applicant for a taxi or private hire vehicle (PHV) driver's licence must have held a full ordinary GB driving licence for at least 12 months in order to be granted a taxi or PHV driver's licence. This requirement has subsequently been amended since the 1976 Act was passed. The Driving Licences (Community Driving Licence) Regulations 1996 (SI 1996 No 1974) amended sections 51 and 59 of the 1976 Act to

allow full driving licences issued by EEA states to count towards the qualification requirements for the grant of taxi and PHV driver's licences. Since that time, a number of central and eastern European states have joined the EU and the EEA and the Department takes the view that drivers from the Accession States are eligible to acquire a taxi or PHV driver's licence under the 1976 Act if they have held an ordinary driving licence for 12 months which was issued by an acceding State (see section 99A(i) of the Road Traffic Act 1988). To complete the picture, the Deregulation (Taxis and Private Hire Vehicles) Order 1998 (SI 1998 No 1946) gave equal recognition to Northern Ireland driving licences for the purposes of taxi and PHV driver licensing under the 1976 Act (see section 109(i) of the Road Traffic Act 1988, as amended).

### **Criminal Record Checks**

58. A criminal record check is an important safety measure particularly for those working closely with children and the vulnerable. Taxi and PHV drivers can be subject to a Standard Disclosure (and for those working in "Regulated Activity" to an Enhanced Disclosure) through the Criminal Records Bureau. Both levels of Disclosure include details of spent and unspent convictions, cautions reprimands and final warnings. An Enhanced Disclosure may also include any other information held in police records that is considered relevant by the police, for example, details of minor offences, non-conviction information on the Police National Computer such as Fixed Penalty Notices and, in some cases, allegations. An Enhanced Disclosure is for those working in Regulated Activity<sup>1</sup> and the Government has produced guidance in relation to this and the new "Vetting and Barring Scheme" which is available at [www.isa.gov.org.uk/default.aspx?page=402](http://www.isa.gov.org.uk/default.aspx?page=402). [*The Department will issue further advice as the new SVG scheme develops.*]

59. In considering an individual's criminal record, local licensing authorities will want to consider each case on its merits, but they should take a particularly cautious view of any offences involving violence, and especially sexual attack. In order to achieve consistency, and thus avoid the risk of successful legal challenge, local authorities will doubtless want to have a clear policy for the consideration of criminal records, for example the number of years they will require to have elapsed since the commission of particular kinds of offences before they will grant a licence.

60. Local licensing authorities will also want to have a policy on background checks for applicants from elsewhere in the EU and other overseas countries. One approach is to require a certificate of good conduct authenticated by the relevant embassy. The Criminal Records Bureau website ([www.crb.gov.uk](http://www.crb.gov.uk)) gives information about obtaining certificates of good conduct, or similar documents, from a number of countries.

61. It would seem best practice for Criminal Records Bureau disclosures to be sought when a licence is first applied for and then every three years, even if a licence is renewed annually, provided drivers are obliged to report all new convictions and cautions to the licensing authority.

<sup>1</sup> "Regulated Activity" is defined in The Safeguarding Vulnerable Groups Act 2006 (Miscellaneous Provisions) Regulations 2009

### **Notifiable Occupations Scheme**

62. Under this Scheme, when an individual comes to the notice of the police and identifies their occupation as a taxi or PHV driver, the police are requested to notify the appropriate local licensing authority of convictions and any other relevant information that indicates that a person poses a risk to public safety. Most notifications will be made once an individual is convicted however, if there is a sufficient risk, the police will notify the authority immediately.

63. In the absence of a national licensing body for taxi and PHV drivers, notifications are made to the local licensing authority identified on the licence or following interview. However, it is expected that all licensing authorities work together should they ascertain that an individual is operating under a different authority or with a fraudulent licence.

64. The police may occasionally notify licensing authorities of offences committed abroad by an individual however it may not be possible to provide full information.

65. The Notifiable Occupations Scheme is described in Home Office Circular 6/2006 which is available at <http://www.knowledgenetwork.gov.uk/HO/circular.nsf>. Further information can also be obtained from the Criminal Records Team, Joint Public Protection Information Unit, Fifth Floor, Fry Building, 2 Marsham Street, London SW1P 4DF; e-mail [Samuel.Wray@homeoffice.gsi.gov.uk](mailto:Samuel.Wray@homeoffice.gsi.gov.uk).

### **Immigration checks**

66. The Department considers it appropriate for licensing authorities to check on an applicant's right to work before granting a taxi or PHV driver's licence. It is important to note that a Criminal Records Bureau check is not a Right to Work check and any enquires about the immigration status of an individual should be addressed to the Border and Immigration Agency. Further information can be found at [www.bia.homeoffice.gov.uk/employingmigrants](http://www.bia.homeoffice.gov.uk/employingmigrants). More generally, the Border and Immigration Agency's Employers' Helpline (0845 010 6677) can be used by licensing staff to obtain general guidance on immigration documentation, although this Helpline is not able to advise on individual cases. The authority can obtain case specific immigration status information, including whether a licensing applicant is permitted to work or details of work restrictions, from the Evidence and Enquiry Unit, Floor 12, Lunar House, Wellesley Road, Croydon CR9 2BY . Further details on the procedures involved can be obtained by contacting the Unit (020 8196 3011).

### **Medical fitness**

67. It is clearly good practice for medical checks to be made on each driver before the initial grant of a licence and thereafter for each renewal. There is general recognition that it is appropriate for taxi/PHV drivers to have more stringent medical standards than those applicable to normal car drivers because:

they carry members of the general public who have expectations of a safe journey;

they are on the road for longer hours than most car drivers; and

they may have to assist disabled passengers and handle luggage.

68. It is common for licensing authorities to apply the “Group 2” medical standards – applied by DVLA to the licensing of lorry and bus drivers – to taxi and PHV drivers. This seems best practice. The Group 2 standards preclude the licensing of drivers with insulin treated diabetes. However, exceptional arrangements do exist for drivers with insulin treated diabetes, who can meet a series of medical criteria, to obtain a licence to drive category C1 vehicles (ie 3500-7500 kgs lorries); the position is summarised at Annex C to the Guidance. It is suggested that the best practice is to apply the C1 standards to taxi and PHV drivers with insulin treated diabetes.

#### **Age Limits**

69. It does not seem necessary to set a maximum age limit for drivers provided that regular medical checks are made. Nor do minimum age limits, beyond the statutory periods for holding a full driver licence, seem appropriate. Applicants should be assessed on their merits.

#### **Driving Proficiency**

70. Many local authorities rely on the standard car driving licence as evidence of driving proficiency. Others require some further driving test to be taken. Local authorities will want to consider carefully whether this produces benefits which are commensurate with the costs involved for would-be drivers, the costs being in terms of both money and broader obstacles to entry to the trade. However, they will note that the Driving Standards Agency provides a driving assessment specifically designed for taxis.

#### **Language proficiency**

71. Authorities may also wish to consider whether an applicant would have any problems in communicating with customers because of language difficulties.

#### **Other training**

72. Whilst the Department has no plans to make training courses or qualifications mandatory, there may well be advantage in encouraging drivers to obtain one of the nationally-recognised vocational qualifications for the taxi and PHV trades. These will cover customer care, including how best to meet the needs of people with disabilities. More information about these qualifications can be obtained from *GoSkills*, the Sector Skills Council for Passenger Transport. *GoSkills* is working on a project funded by the Department to raise standards in the industry and *GoSkills* whilst not a direct training provider, can guide and support licensing authorities through its regional network of Regional Managers.

73. Some licensing authorities have already established training initiatives and others are being developed; it is seen as important to do this in consultation with the local taxi

and PHV trades. Training can cover customer care, including how best to meet the needs of people with disabilities and other sections of the community, and also topics such as the relevant legislation, road safety, the use of maps and GPS, the handling of emergencies, and how to defuse difficult situations and manage conflict. Training may also be considered for applicants to enable them to reach an appropriate standard of comprehension, literacy and numeracy. Authorities may wish to note that nationally recognised qualifications and training programmes sometimes have advantages over purely local arrangements (for example, in that the qualification will be more widely recognised).

Contact details are:

*GoSkills*, Concorde House, Trinity Park, Solihull, Birmingham, B37 7UQ.

Tel: 0121-635-5520

Fax: 0121-635-5521

Website: [www.goskills.org](http://www.goskills.org)

e-mail: [info@goskills.org](mailto:info@goskills.org)

74. It is also relevant to consider driver training in the context of the 2012 Olympic and Paralympic Games which will take place at a number of venues across the country. One of the key aims of the Games is to “change the experience disabled people have when using public transport during the Games and to leave a legacy of more accessible transport”. The Games provide a unique opportunity for taxi/PHV drivers’ to demonstrate their disability awareness training, and to ensure all passengers experience the highest quality of service.

### **Topographical Knowledge**

75. Taxi drivers need a good working knowledge of the area for which they are licensed, because taxis can be hired immediately, directly with the driver, at ranks or on the street. So most licensing authorities require would-be taxi-drivers to pass a test of local topographical knowledge as a pre-requisite to the first grant of a licence (though the stringency of the test should reflect the complexity or otherwise of the local geography, in accordance with the principle of ensuring that barriers to entry are not unnecessarily high).

76. However, PHVs are not legally available for immediate hiring in the same way as taxis. To hire a PHV the would-be passenger has to go through an operator, so the driver will have an opportunity to check the details of a route before starting a journey. So it may be unnecessarily burdensome to require a would-be PHV driver to pass the same ‘knowledge’ test as a taxi driver, though it may be thought appropriate to test candidates’ ability to read a map and their knowledge of key places such as main roads and railway stations. The Department is aware of circumstances where, as a result of the repeal of the PHV contract exemption, some people who drive children on school contracts are being deterred from continuing to do so on account of overly burdensome topographical tests. Local authorities should bear this in mind when assessing applicants’ suitability for PHV licences.

## **PHV OPERATORS**

77. The objective in licensing PHV operators is, again, the safety of the public, who will be using operators' premises and vehicles and drivers arranged through them.

### **Criminal Record Checks**

78. PHV operators (as opposed to PHV drivers) are not exceptions to the Rehabilitation of Offenders Act 1974, so Standard or Enhanced disclosures cannot be required as a condition of grant of an operator's licence. But a Basic Disclosure, which will provide details of unspent convictions only, could be seen as appropriate, after such a system has been introduced by the Criminal Records Bureau. No firm date for introduction has yet been set; however, a feasibility study has been completed; the Criminal Records Bureau is undertaking further work in this regard. Overseas applicants may be required to provide a certificate of good conduct from the relevant embassy if they have not been long in this country. Local licensing authorities may want to require a reference, covering for example the applicant's financial record, as well as the checks outlined above.

### **Record Keeping**

79. It is good practice to require operators to keep records of each booking, including the name of the passenger, the destination, the name of the driver, the number of the vehicle and any fare quoted at the time of booking. This information will enable the passenger to be traced if this becomes necessary and should improve driver security and facilitate enforcement. It is suggested that 6 months is generally appropriate as the length of time that records should be kept.

### **Insurance**

80 It is appropriate for a licensing authority to check that appropriate public liability insurance has been taken out for premises that are open to the public.

### **Licence Duration**

81. A requirement for annual licence renewal does not seem necessary or appropriate for PHV operators, whose involvement with the public is less direct than a driver (who will be alone with passengers). Indeed, a licence period of five years may well be appropriate in the average case. Although the authority may wish to offer operators the option of a licence for a shorter period if requested.

### **Repeal of the PHV contract exemption**

82. Section 53 of the Road Safety Act 2006 repealed the exemption from PHV licensing for vehicles which were used on contracts lasting not less than seven days. The

change came into effect in January 2008. A similar change was introduced in respect of London in March 2008. As a result of this change, local licensing authorities are considering a range of vehicles and services in the context of PHV licensing which they had not previously licensed because of the contract exemption.

83. The Department produced a guidance note in November 2007 to assist local licensing authorities, and other stakeholders, in deciding which vehicles should be licensed in the PHV regime and which vehicles fell outside the PHV definition. The note stressed that it was a matter for local licensing authorities to make decisions in the first instance and that, ultimately, the courts were responsible for interpreting the law. However, the guidance was published as a way of assisting people who needed to consider these issues. A copy of the guidance note can be found on the Department's web-site at: <http://www.dft.gov.uk/pgr/regional/taxis/rsa06privatehirevehicles>. As a result of a recent report on the impact of the repeal of the PHV contract exemption, the Department will be revising its guidance note to offer a more definite view about which vehicles should be licensed as PHVs. The report is also on the Department's web-site at: <http://www.dft.gov.uk/pgr/regional/taxis/phvcontractexemption/>.

## **ENFORCEMENT**

84. Well-directed enforcement activity by the local licensing authority benefits not only the public but also the responsible people in the taxi and PHV trades. Indeed, it could be argued that the safety of the public depends upon licensing authorities having an effective enforcement mechanism in place. This includes actively seeking out those operators who are evading the licensing system, not just licensing those who come forward seeking the appropriate licences. The resources devoted by licensing authorities to enforcement will vary according to local circumstances, including for example any difficulties with touting by unlicensed drivers and vehicles (a problem in some urban areas). Local authorities will also wish to liaise closely with the police. Multi-agency enforcement exercises (involving, for example, the Benefits Agency) have proved beneficial in some areas.

85. Local licensing authorities often use enforcement staff to check a range of licensed activities (such as market traders) as well as the taxi and PHV trades, to make the best use of staff time. But it is desirable to ensure that taxi and PHV enforcement effort is at least partly directed to the late-night period, when problems such as touting tend most often to arise. In formulating policies to deal with taxi touts, local licensing authorities might wish to be aware that the Sentencing Guidelines Council have, for the first time, included guidance about taxi touting in their latest Guidelines for Magistrates. The Guidelines, which came into effect in August 2008, can be accessed through the SGC's web-site - [www.sentencing-guidelines.gov.uk](http://www.sentencing-guidelines.gov.uk).

86. Some local licensing authorities employ taxi marshals in busy city centres where there are lots of hirings, again perhaps late at night, to help taxi drivers picking up, and would-be passengers queuing for taxis.

87. As part of enforcement, local licensing authorities will often make spot checks, which can lead to their suspending or revoking licences. They will wish to consider carefully which power should best be used for this purpose. They will note, among other things, that section 60 of the Local Government (Miscellaneous Provisions) Act 1976

provides a right of appeal for the licence-holder, whereas section 68, which is also sometimes used, does not; this can complicate any challenge by the licence-holder.

88. Section 52 of the Road Safety Act 2006 amended the Local Government (Miscellaneous Provisions) Act 1976 such that local authorities can now suspend or revoke a taxi or PHV driver's licence with immediate effect on safety grounds. It should be stressed that this power can only be used where safety is the principal reason for suspending or revoking and where the risk justifies such an approach. It is expected that in the majority of cases drivers will continue to work pending appeal and that this power will be used in one-off cases. But the key point is that the law says that the power must be used in cases which can be justified in terms of safety. The Department is not proposing to issue any specific guidance on this issue, preferring to leave it to the discretion of licensing authorities as to when the power should be used.

### **TAXI ZONES**

89. The areas of some local licensing authorities are divided into two or more zones for taxi licensing purposes. Drivers may be licensed to ply for hire in one zone only. Zones may exist for historical reasons, perhaps because of local authority boundary changes.

90. The Department recommends the abolition of zones. That is chiefly for the benefit of the travelling public. Zoning tends to diminish the supply of taxis and the scope for customer choice - for example, if fifty taxis were licensed overall by a local authority, but with only twenty five of them entitled to ply for hire in each of two zones. It can be confusing and frustrating for people wishing to hire a taxi to find that a vehicle licensed by the relevant local authority is nonetheless unable to pick them up (unless pre-booked) because they are in the wrong part of the local authority area. Abolition of zones can also reduce costs for the local authority, for example through simpler administration and enforcement. It can also promote fuel efficiency, because taxis can pick up a passenger anywhere in the local authority area, rather than having to return empty to their licensed zone after dropping a passenger in another zone.

91. It should be noted that the Government has now made a Legislative Reform Order which removed the need for the Secretary of State to approve amalgamation resolutions made by local licensing authorities. The Legislative Reform (Local Authority Consent Requirements)(England and Wales) Order 2008 came into force in October 2008. Although these resolutions no longer require the approval of the Secretary of State, the statutory procedure for making them – in paragraph 25 of schedule 14 to the Local Government Act 1972- remains the same.

### **FLEXIBLE TRANSPORT SERVICES**

92. It is possible for taxis and PHVs to provide flexible transport services in a number of different ways. Such services can play a valuable role in meeting a range of transport needs, especially in rural areas – though potentially in many other places as well. In recent years there has been a significant increase in the provision of flexible services, due partly to the availability of Rural Bus Subsidy Grant and Rural Bus Challenge Support from the Department.



93. The Department encourages local licensing authorities, as a matter of best practice, to play their part in promoting flexible services, so as to increase the availability of transport to the travelling public. This can be done partly by drawing the possibilities to the attention of taxi and PHV trade. It also should be borne in mind that vehicles with a higher seating capacity than the vehicles typically licensed as taxis (for example those with 6, 7 or 8 passenger seats) may be used for flexible services and should be considered for licensing in this context.

94. The main legal provisions under which flexible services can be operated are:

**Shared taxis and PHVs – advance bookings (section 11, Transport Act 1985):** licensed taxis and PHVs can provide a service at separate fares for up to eight passengers sharing the vehicle. The operator takes the initiative to match up passengers who book in advance and agree to share the vehicle at separate fares (lower than for a single hiring). An example could be passengers being picked up at home to go to a shopping centre, or returning from the shops to their homes. The operator benefits through increased passenger loadings and total revenues.

**Shared taxis – immediate hirings (section 10, Transport Act 1985):** such a scheme is at the initiative of the local licensing authority, which can set up schemes whereby licensed taxis (not PHVs) can be hired at separate fares by up to eight people from ranks or other places that have been designated by the authority. (The authority is required to set up such a scheme if holders of 10% or more of the taxi licences in the area ask for one.) The passengers pay only part of the metered fare, for example in going home after a trip to the local town, and without pre-booking, but the driver receives more than the metered fare.

**Taxibuses (section 12, Transport Act 1985):** owners of licensed taxis can apply to the Traffic Commissioner for a 'restricted public service vehicle (PSV) operator licence'. The taxi owner can then use the vehicle to run a bus service for up to eight passengers. The route must be registered with the Traffic Commissioner and must have at least one stopping place in the area of the local authority that licensed the taxi, though it can go beyond it. The bus service will be eligible for Bus Service Operators Grant (subject to certain conditions) and taxibuses can be used for local authority subsidised bus services. The travelling public have another transport opportunity opened for them, and taxi owners have another business opportunity. The Local Transport Act 2008 contains a provision which allows the owners of PHVs to acquire a special PSV operator licence and register a route with the traffic commissioner. A dedicated leaflet has been sent to licensing authorities to distribute to PHV owners in their area alerting them to this new provision.

95. The Department is very keen to encourage the use of these types of services. More details can be found in the Department's publication 'Flexible Transport Services' which can be accessed at: [www.dft.gov.uk/stellent/groups/dft\\_localtrans/documents/page/dft\\_localtrans\\_504004.hcsp](http://www.dft.gov.uk/stellent/groups/dft_localtrans/documents/page/dft_localtrans_504004.hcsp).

## **LOCAL TRANSPORT PLANS**

96. The Transport Act 2000 as amended by the Transport Act 2008, requires local transport authorities in England outside London to produce and maintain a Local Transport Plan (LTP), having regard to any guidance issued by the Secretary of State. The latest guidance published in July 2009 will cover the next round of LTPs from 2011. LTPs set out the authority's local transport strategies and policies for transport in their area, and an implementation programme. 82 LTPs covering all of England outside London have been produced and cover the period up to 2011. From 2011 local authorities will have greater freedom to prepare their LTPs to align with wider local objectives.

97. All modes of transport including taxi and PHV services have a valuable part to play in overall transport provision, and so local licensing authorities have an input to delivering the LTPs. The key policy themes for such services could be availability and accessibility. LTPs can cover:

quantity controls, if any, and plans for their review;

licensing conditions, with a view to safety but also to good supply of taxi and PHV services;

fares;

on-street availability, especially through provision of taxi ranks;

vehicle accessibility for people with disabilities;

encouragement of flexible services.

**TAXI AND PRIVATE HIRE VEHICLE LICENSING: BEST PRACTICE GUIDANCE**  
**Useful questions when assessing quantity controls of taxi licences**

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

Questions relating to the policy of controlling numbers

Have you recently reviewed the need for your policy of quantity controls?

What form did the review of your policy of quantity controls take?

Who was involved in the review?

What decision was reached about retaining or removing quantity controls?

Are you satisfied that your policy justifies restricting entry to the trade?

Are you satisfied that quantity controls do not:

- reduce the availability of taxis;
- increase waiting times for consumers;
- reduce choice and safety for consumers?

What special circumstances justify retention of quantity controls?

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

How does your policy benefit the trade?

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

Questions relating to setting the number of taxi licences

When last did you assess unmet demand?

How is your taxi limit assessed?

Have you considered latent demand, ie potential consumers who would use taxis if more were available, but currently do not?

Are you satisfied that your limit is set at the correct level?

How does the need for adequate taxi ranks affect your policy of quantity controls?

Questions relating to consultation and other public transport service provision

When consulting, have you included etc

- all those working in the market;
- consumer and passenger (including disabled) groups;
- groups which represent those passengers with special needs;
- local interest groups, eg hospitals or visitor attractions;
- the police;
- a wide range of transport stakeholders eg rail/bus/coach providers and traffic managers?

Do you receive representations about taxi availability?

What is the level of service currently available to consumers (including other public transport modes)?

**TAXI AND PRIVATE HIRE VEHICLE LICENSING: BEST PRACTICE GUIDANCE**

*Notice for taxi passengers - what you can expect from the taxi trade and what the taxi trade can expect from you*

*The driver will:*

*Drive with due care and courtesy towards the passenger and other road users.*

*Use the meter within the licensed area, unless the passenger has agreed to hire by time.*

*If using the meter, not start the meter until the passenger is seated in the vehicle.*

*If travelling outside the licensed area, agree the fare in advance. If no fare has been negotiated in advance for a journey going beyond the licensing area then the driver must adhere to the meter.*

*Take the most time-efficient route, bearing in mind likely traffic problems and known diversions, and explain any diversion from the most direct route.*

*The passenger will:*

*Treat the vehicle and driver with respect and obey any notices (e.g. in relation to eating in the vehicle).*

*Ensure they have enough money to pay the fare before travelling. If wishing to pay by credit card or to stop on route to use a cash machine, check with the driver before setting off.*

*Be aware of the fare on the meter and make the driver aware if it is approaching the limit of their financial resources.*

*Be aware that the driver is likely to be restricted by traffic regulations in relation to where s/he can stop the vehicle.*

*Notice for PHV passengers - what you can expect from the PHV trade and what the PHV trade can expect from you*

*The driver will:*

*Ensure that the passenger has pre-booked and agrees the fare before setting off.*

*Drive with due care and courtesy towards the passenger and other road users.*

*Take the most time-efficient route, bearing in mind likely traffic problems and known diversions, and explain any diversion from the most direct route.*

*The passenger will:*

*Treat the vehicle and driver with respect and obey any notices (eg. in relation to eating in the vehicle).*

*Ensure they have enough money to pay the fare before travelling. If wishing to pay by credit card or to stop on route to use a cash machine, check with the driver before setting off.*

*Be aware that the driver is likely to be restricted by traffic regulations in relation to where s/he can stop the vehicle.*

**TAXI AND PRIVATE HIRE VEHICLE LICENSING: BEST PRACTICE GUIDANCE****Assessing applicants for a taxi or PHV driver licence in accordance with C1 standard****Exceptional circumstances under which DVLA will consider granting licences for vehicles over 3.5 tonnes or with more than 8 passenger seats.**

Insulin treated diabetes is a legal bar to driving these vehicles. The exceptional arrangements that were introduced in September 1998 were only in respect of drivers who were employed to drive small lorries between 3.5 tonnes and 7.5 tonnes (category C1). The arrangements mean that those with good diabetic control and who have no significant complications can be treated as "exceptional cases" and may have their application for a licence for category C1 considered. The criteria are

To have been taking insulin for at least 4 weeks;

Not to have suffered an episode of hypoglycaemia requiring the assistance of another person whilst driving in the last 12 months;

To attend an examination by a hospital consultant specialising in the treatment of diabetes at intervals of not more than 12 months and to provide a report from such a consultant in support of the application which confirms a history of responsible diabetic control with a minimal risk of incapacity due to hypoglycaemia;

To provide evidence of at least twice daily blood glucose monitoring at times when C1 vehicles are being driven (those that have not held C1 entitlement in the preceding 12 months may provide evidence of blood glucose monitoring while driving other vehicles);

To have no other condition which would render the driver a danger when driving C1 vehicles; and

To sign an undertaking to comply with the directions of the doctor(s) treating the diabetes and to report immediately to DVLA any significant change in condition.

## **APPENDIX 2**

### **Ergonomic requirements DfT**



## Ergonomic requirements for accessible taxis

Increasing availability, comfort and safety for all passengers



Department for  
**Transport**

**Ricability**

**esri**

**Loughborough  
University**





## introduction

By 2020 close to half the adult population of the UK will be over 50 years old and the majority of Europeans can now look forward to 30 years of active life after 50. However, one in five of the adult population has a disability and nearly half (48%) of the disabled population is aged 65 or older with some 29% of the disabled population being aged 75 or more.

Almost all of us will suffer some disabling mobility impairment at some time in our lives and transport related regulations introduced under the DDA(1995) are intended to ensure that safe and convenient mobility is available to as many people as possible. Taxis play a critical role in the transport chain. They often provide the links between other forms of transport (rail, air, coach etc); modes which may now be accessible for those with mobility impairments. In many cases they may represent the only form of transport that can provide a door to door service. An improvement in the accessibility of taxis can therefore be expected to offer significant benefit to disabled travellers making a wide range of journey types.

The principal barriers to using taxis for many people with mobility impairments are connected with the need to step up to and into the passenger compartment, negotiate a door with low head clearance and then access a seat which may be either low or set some distance back from the door. Physical frailty and stiff or painful joints may make all of these formidable challenges. Wheelchair users face a different set of challenges associated with the widespread use of ramps.

The recommendations summarised in this leaflet are intended to lead to taxi designs which are more accessible by reducing the difficulties of getting in and out and using the seats comfortably and conveniently.

The advice provided in this guide is based on a programme of ergonomic research undertaken to provide a definition of the requirements of a taxi designed to be fully accessible.



## ramps

A steep ramp can make accessing a taxi difficult for wheelchair users, it may also represent a hazard for their assistants and taxi drivers. An ideal design would involve level entry from the kerb. If a gradient is required it should be less than 7°. Ramps should not provide an obstacle for pedestrians on the pavement and their length should be restricted to 1000mm. It is also important that ramps have a safety lip (50mm), are the same width as the door opening and comprise a single non-slip surface. Their edges should be highlighted to reduce the risk of trips.



## steps

Some people cannot manage even a single step and may need a ramp with a gentle gradient if level entry isn't possible. If steps are necessary they should be restricted to a single step that is 100mm high. The steps should be the width of the door entry and be closed at the back without an overhang to reduce the risk of tripping.



## doors and door apertures

Narrow doors and a low head clearance can cause significant difficulties for ambulant passengers and wheelchair users. A door width of at least 850mm will provide adequate clearance for wider wheelchairs and walking frames. A door height of 1595mm is required to prevent painful stooping and to minimise the risk of a head strike for passengers with visual impairments.

While hinged doors can provide a valuable form of support for passengers entering or leaving a vehicle, opening and closing them from the inside can be difficult for seated passengers and larger doors become a potential hazard for pedestrians on the pavement. Sliding doors can provide a large opening but secure latching must be ensured. Powered closure is now available in some vehicles and, if under the driver's supervision, this may provide an effective solution. Sliding doors are often associated with more

generous door apertures but care must be taken to ensure that opening and closing efforts are kept below 70N. Again, powered closure may provide an effective solution.

There are advantages and disadvantages associated with wheelchair access from the side and rear of a vehicle. Side access does not require wheelchairs to negotiate a kerb or enter the carriage way and enables shallower ramp angles from the pavement. Rear access may be the most practicable means of access in non-urban environments. It may also enable simpler manoeuvres to a secure travelling position inside the vehicle but may not be possible from a taxi rank or kerbside. The requirements outlined above (ramps and door size) are applicable in both cases.

## passenger compartment

An interior roof height of at least 1625mm (ideally 1825) is required. If internal space is limited then it is important that passengers can access seats as directly as possible from an entrance. If there is a more generous provision (as when wheelchairs can also be accommodated in front of the passenger seats) it is important that there is sufficient internal height to prevent the need to stoop. Adequate provision of grab handles is an important requirement in other cases.

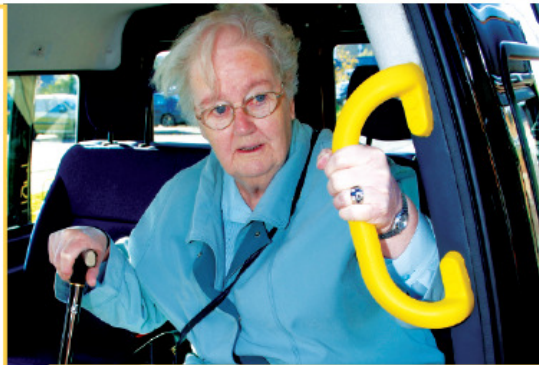
Manoeuvring space measuring\* to identify that this research is referring to manoeuvring space only and has not

## seating

As low seats can be difficult for passengers with stiff or painful joints to use seat heights need to be between 430mm - 460mm from the floor and the squab should not have a pronounced angle. In order to accommodate passengers with limited leg flexibility a space of at least 1176mm between the seat back and any forward obstruction is required. A swivel seat (preferably powered) can provide a valuable

considered the kinematics of a wheelchair occupant during a vehicle impact at least 1300mm by 1340mm is required. This assumes that the wheelchair will be carried facing backwards and there is a side entrance. If the wheelchair is to face forwards then a slightly larger manoeuvring space is required. The position of the side door affects the manoeuvring space required and for forward facing carriage the manoeuvring space is minimised if the door way is set back from the main bulkhead.

alternate means of entry for passengers who find even a low single step difficult to negotiate. It is important that such seats provide a sense of security for the passenger while they are in operation and that they are large enough to provide a secure and comfortable ride.



## handles and grab handles

Door handles that allow the passenger to use their whole hand to exert leverage and a range of opening strategies are preferable. Handle operation and latching efforts should be minimised to assist passengers who have limited upper body strength.

Grab handles play an important role in supporting access and providing stability support whilst passengers are inside a vehicle. The precise location will be dependent on the design of the vehicle and, in particular, the means of entry (i.e. step, ramp, swivel seat etc). Handles should have a diameter of 40mm and surface clearance of 45mm. For standing passengers (travelling in other modes of public transport) a height of around 900mm is recommended. However, lower positioning is more appropriate for handles in taxis intended to assist passengers getting up from seats or children climbing into a vehicle. Horizontal handles are more helpful inside a vehicle but vertical handles are recommended for doorways.



## visibility and lighting

For passengers with impaired vision feature and edge high-lighting can provide important assistance. The following features should be visually emphasised: exterior and interior door handles, step and ramp edges, door edges and door apertures, grab handles, seat edges and facilities provided to allow communication with the driver.



Ambient lighting within the passenger compartment should be at least 150lux but higher levels of illumination may cause distraction for the driver and adaptation problems for some passengers alighting into a dark street. Brighter feature lighting (>200lux) is recommended for steps, the meter display and the communication window. In all cases lighting sources should be positioned so as to prevent shadowing.

**For further information please contact:**

**Mobility and Inclusion Unit, Department for Transport, Great Minster House**  
76 Marsham Street, London. SW1P 4DR Tel: 020 7944 8021  
Minicom: Tel: 020 7944 3277 Fax: 020 7944 6102

## **APPENDIX 3**

### **Rank Observations**

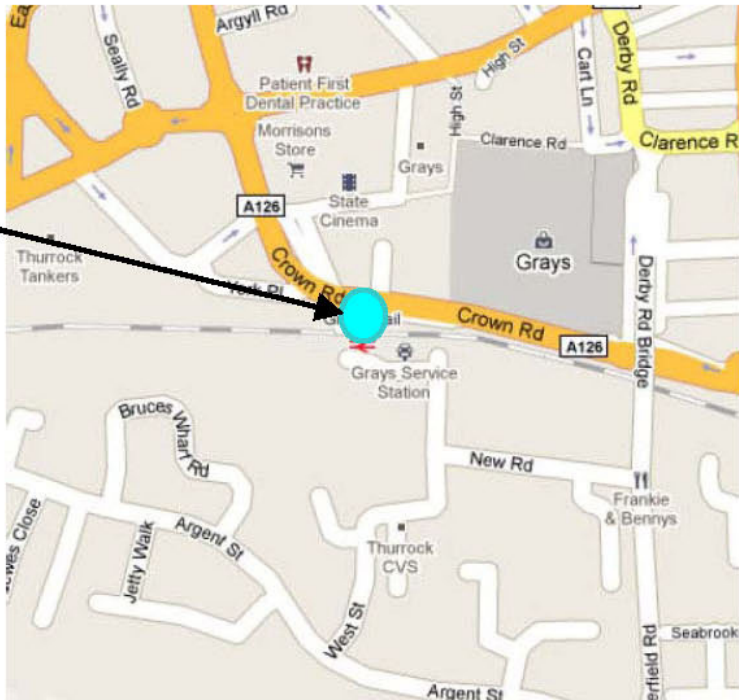
## **APPENDIX 4**

### **RANK LOCATION FIGURES**



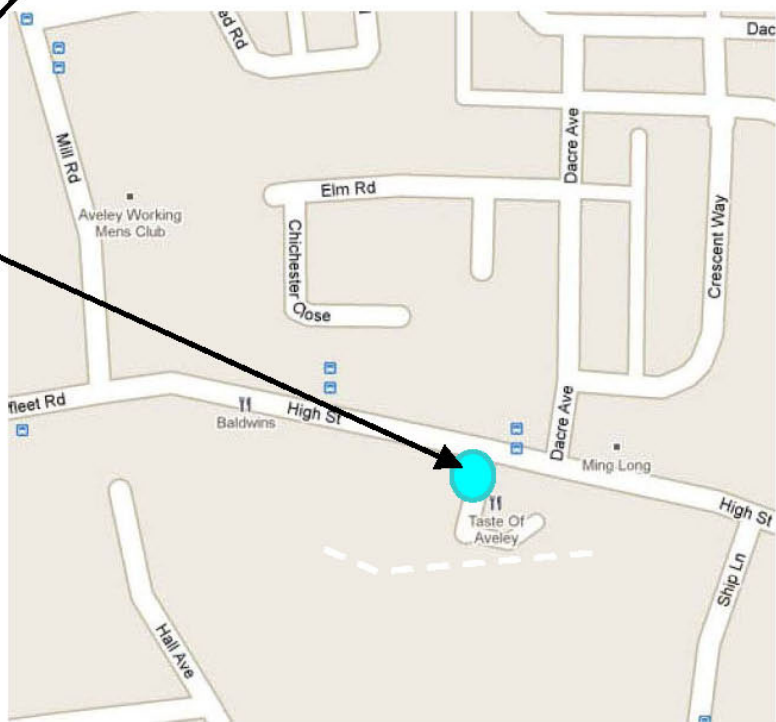


Taxi Rank  
Location



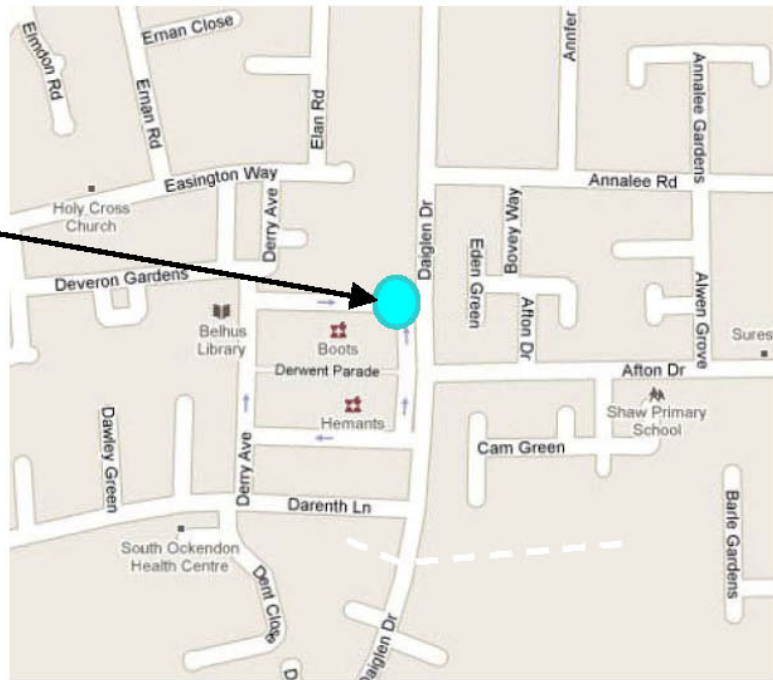


Taxi Rank Location

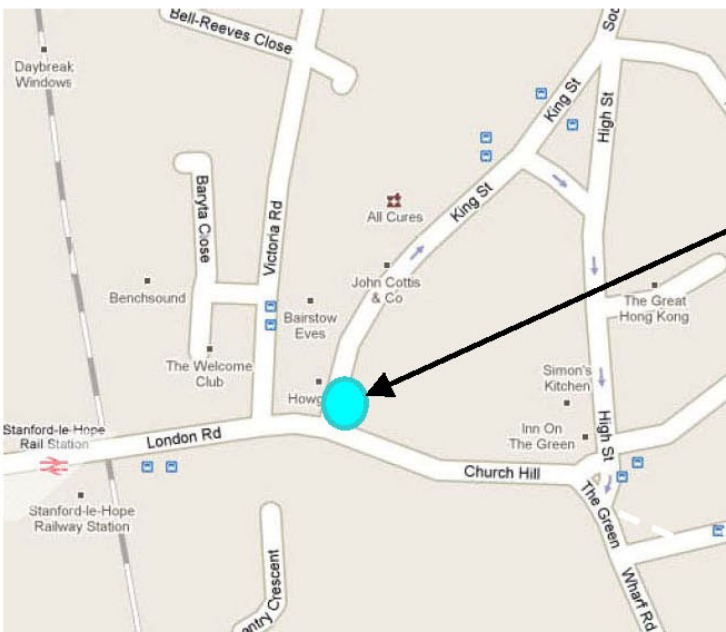




Taxi Rank Location

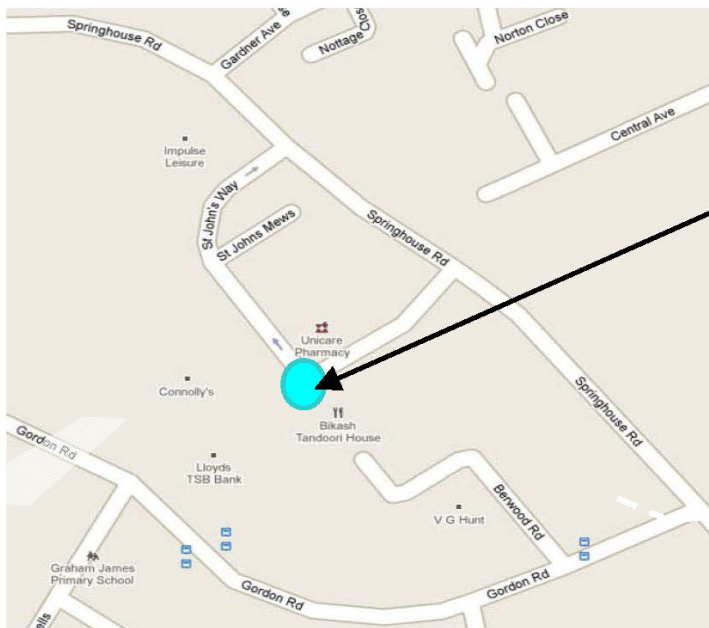






Taxi Rank Location





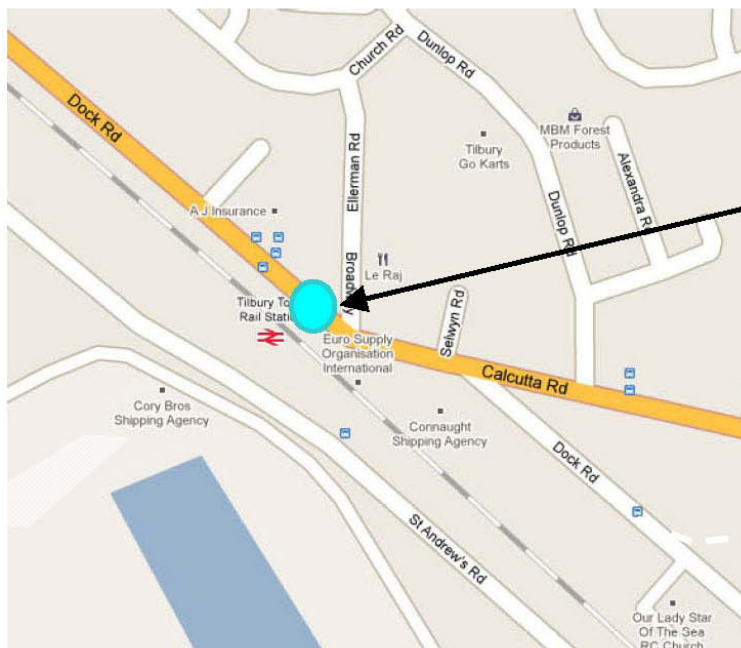
Taxi Rank Location



22321  
April 2010

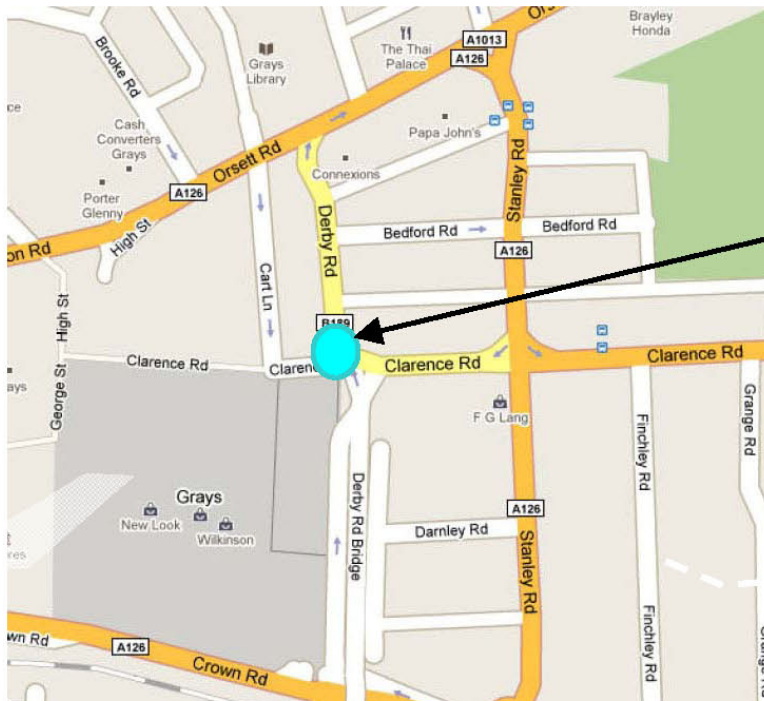
Rank 5 – St. John's Way, Corringham

Figure 5

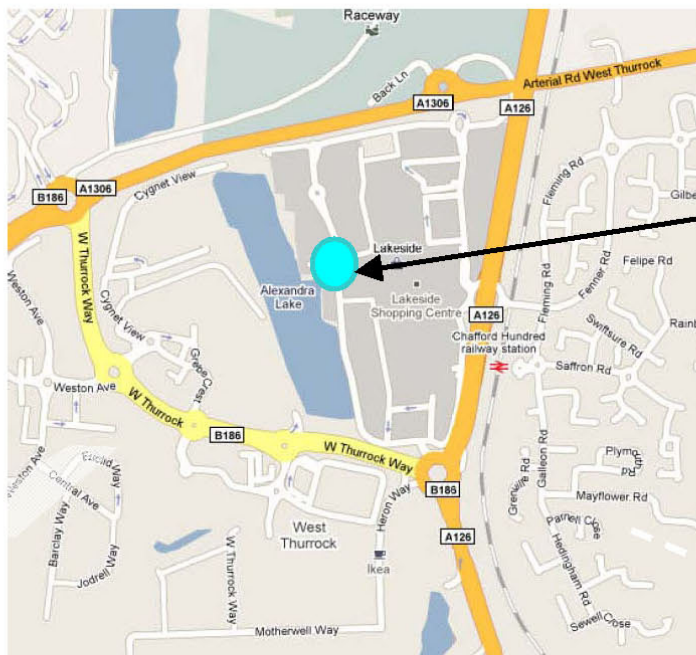
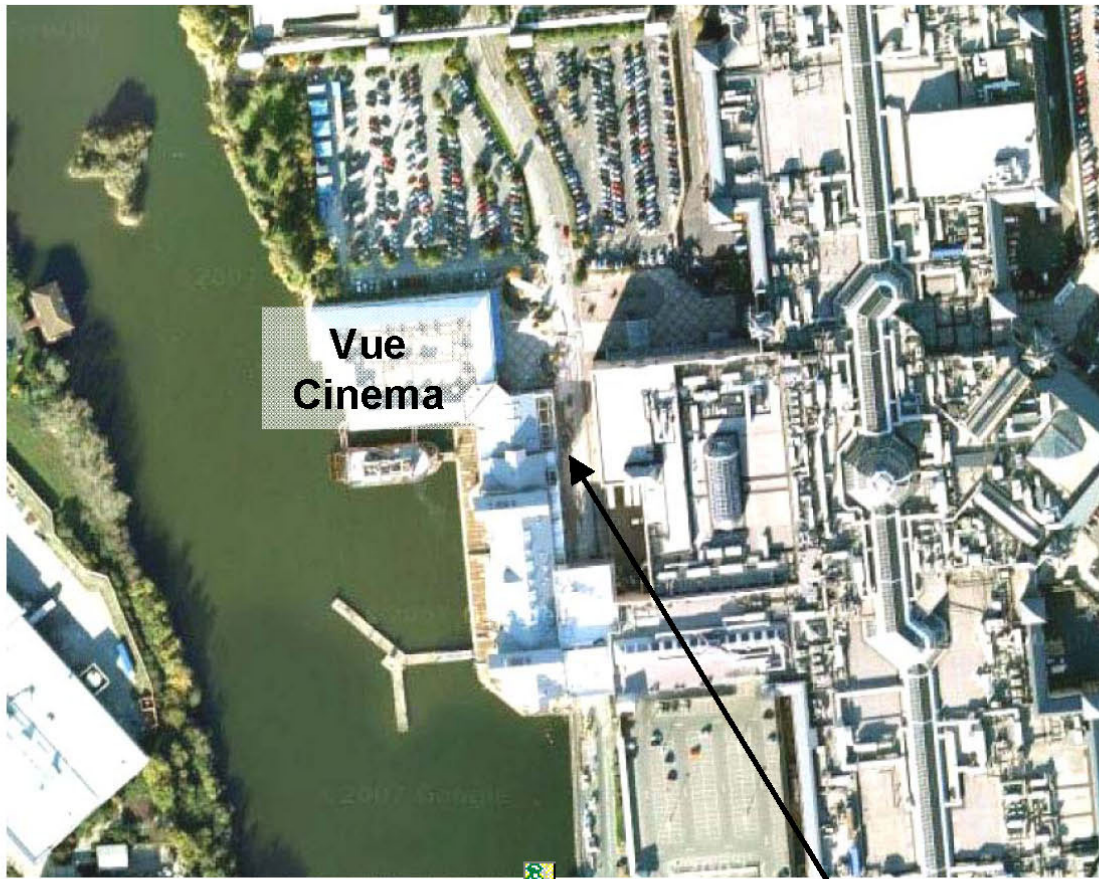


Taxi Rank Location



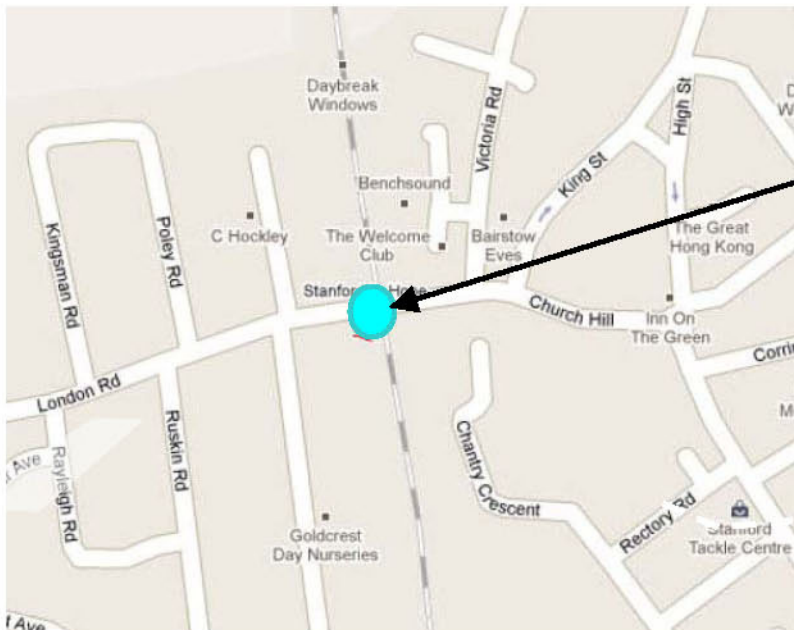


Taxi Rank Location

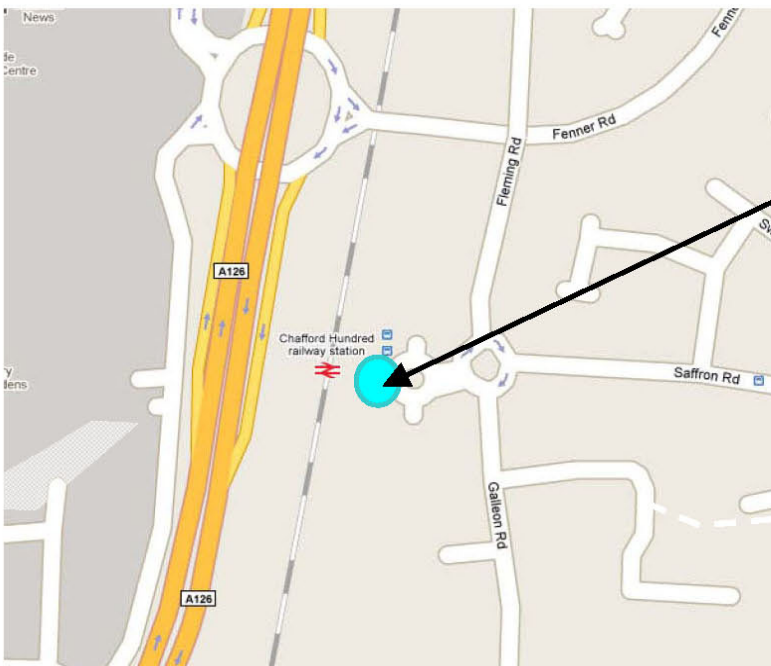


**Taxi Rank  
Location**





Taxi Rank Location



Taxi Rank Location