

# KIRKLEES COUNCIL

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## TAXI UNMET DEMAND STUDY



**April 2010**

**TPI**

THE TRANSPORTATION CONSULTANCY

**KIRKLEES COUNCIL**  
**TAXI UNMET DEMAND SURVEY**

**FINAL REPORT**

**APRIL 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 Kirklees 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. Kirklees 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 2006 (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. Draft guidance issued in 2009 did not suggest any change to this but a final version of this guidance has not yet been published. There is also a proposal included in the Single Equalities Bill currently before Parliament, that suggests there may be a requirement, if this Bill becomes law, to accept a license application for an accessible taxis where quantity controls are in place but the proportion of wheelchair accessible vehicles does not meet a standard set by the Secretary of State. The DfT's current 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. The DfT has indicated their intention to publish revised guidance in late 2009 and to this end has recently issued a consultation document. This document highlights the changes to the current guidance DfT is proposing. There are no changes proposed to guidance on quantity restrictions or how unmet demand is measured.
- 1.6 The consultation 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 suggest 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 regulations currently in place through the DDA will be subsumed by the Single Equalities Act if this becomes law, as proposed by the present government, in late 2010.

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

- 1.8 The DfT recently consulted on proposals to require vehicles used as taxis to be accessible to disabled people (see Appendix 3). 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. In the case of PHVs they suggested regulation was less likely citing the need for saloon style vehicles to be available to some disabled and older people, especially for door to door transport usually arranged by telephone booking. The result of this consultation is not expected to be published until 2010.
- 1.9 Currently, licensing authorities are encouraged to introduce taxi accessibility policies for their areas. 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. The Department's guidance emphasises that 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 Hackneys available helps make that possible. However, for PHVs, it is considered that it may be more appropriate for a local authority to licence any type of saloon car, noting that some PHV operators offer accessible vehicles in their fleet.

- 1.10 In March 2007 the standing conference of European Ministers of Transport (ECMT) issued guidance suggesting that there may be a case for considering a mixed fleet of: Type One: Wheelchair Accessible Taxis: accessible vehicles capable of carrying the majority, but not all, passengers who travel in their wheelchair as well as people with other disabilities; and Type Two: Standard Accessible Taxis: vehicles with features designed to make use by disabled people easier, but which would only be able to carry a wheelchair user who can transfer to a seat. They recommended that fleets used for regular services should be composed of a combination of these two types of vehicle and that the proportion of each type is likely to vary from place to place. This was followed in November 2007 by a note issued by the DfT's Mobility and Inclusion Unit (now defunct), which also appeared to support this approach. Current DfT guidance 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.
- 1.15 The consultation on DfT guidance to licensing authorities issued in May 2009 suggested there are likely to be changes to its guidance on accessibility, as a result of its recent accessibility consultation exercise. However what these changes might be are not specified.

### **The Taxi Market**

- 1.16 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.
- 1.17 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.
- 1.18 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

- 1.19 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.
- 1.20 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.
- 1.21 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**

- 1.22 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.
- 1.23 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.
- 1.24 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.



- 1.25 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**

- 1.26 Kirklees 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 Council's consideration of its approach to Hackney licensing in Kirklees. 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.
- 1.27 TPi understands the main objectives of the study are:
- to provide a profile of the taxi trade in Kirklees
  - to consider current demand and any latent demand for taxis, including demand for wheelchair accessible vehicles
  - to identify if any additional vehicles are required to eliminate any significant unmet demand
- 1.28 The study has used a range of research to establish whether there is unmet demand for taxi provision within Kirklees, 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 Kirklees is a Metropolitan Borough in West Yorkshire made up of both urban and rural communities. It sits between South Yorkshire and Greater Manchester. Each town and valley region have strong and distinct identities and contain a rich and diverse mixture of cultures and faiths.
- 2.2 Local towns include Batley, Dewsbury and Huddersfield (former pre-1974 local authority areas - Huddersfield County Borough, Dewsbury County Borough and Batley Municipal Borough). There are also eight Urban Districts. Some Urban Districts are also classed as Civil Parishes and two Civil Parishes share the same boundaries as electoral wards (Denby Dale and Mirfield)
- 2.3 At the last census Kirklees had a population of 403,900 living in 159,031 households. There are 13% and 19% 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 18% of the population, in line with the national average. There are 29.6% of households that have no access to a car or van, compared to the national average of 26.8%.

### **The Taxi Trade in Kirklees**

- 2.5 Kirklees Council currently restricts the number of Hackney Carriage licences to 249 for the whole of the district, 55 of these wheelchair accessible vehicles. Since de-zoning in 1993, a Hackney Carriage driver may ply for hire or stand on a 'taxi rank' anywhere in Kirklees. The Council is aware that Hackney Carriages are not evenly spread across the main population centres; for example there are some 50 to 60 vehicles regularly in use in the Batley area and only some 100+ in Huddersfield. The Council is aware that there is a grey-market value of around £30,000 for a 'plate' (Hackney Carriage licence).
- 2.6 At present there are some 1,520 licensed Private Hire vehicles in Kirklees, 120 of these being wheelchair accessible vehicles. It is estimated that around 50 to 100 vehicles are being added to the Private Hire fleet annually. 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 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

2.8 The table below summarises details of the official Ranks for Hackney Carriages in Kirklees. Rank locations are illustrated in Appendix 3.

(Please note; rank numbers are not consecutive as some ranks have been removed since the numbering system was established)

### a. Official Hackney Carriage Ranks

Rank Number	Rank Location	Spaces
1	Towngate, Holmfirth	2
3	Cross Church Street	3
4	Queens Street	5
5	Queens Gate, Huddersfield	2
6	Southgate, Huddersfield	4
7	Dundas Street. Outside Bus Station, Huddersfield	14
8	Lower Dundas Street, Huddersfield	2
9	Byram Street, Huddersfield	2
10	Lord Street, Huddersfield	6
11	John William Street, Huddersfield	7
12	Venn Street, Huddersfield	10
13	Ramsden Street, Huddersfield	2
14	St. Georges Square, Huddersfield	7
16	Zetland Street, Huddersfield	6
17	Railway Street, outside Estate Buildings, Huddersfield	8
19	Market Street, Outside Music Shop, Huddersfield	12
20	Market Square, Batley	12hr
21	Market Street, Huddersfield	12
22	New North Parade, Huddersfield	6
23	Foundry Street, Dewsbury	24hr
24	Mill Street East, Asda, Dewsbury	24hr
25	Longcause Way & Town Hall Way	5
26	North Gate, Dewsbury	?

27	South Street, Dewsbury	8
28	Wellington Street, Dewsbury	2
29	Ward Hill, Batley	2
30	Henrietta Street, Batley	4
31	Bradford Road, LaLas, Batley	2
32	Bradford Road, Frontier, Batley	17
33	Ludgate Hill, Heckmondwike	3
34	Queen Street, Mirfield	2
35	Greenside, Cleckheaton	13
36	Station Road, Batley	3
37	Station Road Batley (across from Auction Rooms)	8
38	St Tomas Road, Huddersfield	8
39	Market Place, Birstall	5

2.9 Source: *Kirklees Council*

### 3.0 RANK OBSERVATIONS

#### Rank Observation Survey

- 3.1 The rank observation programme covered a period of 567 hours spread across 36 official hackney carriage ranks considered by the Council to be those currently used by the trade. The observations were conducted between November and January 2009. 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
Towngate, Holmfirth	8
Cross Church Street	12
Queens Street	4
Queens Gate, Huddersfield	14
Southgate, Huddersfield	15
Dundas Street. Outside Bus Station, Huddersfield	24
Lower Dundas Street, Huddersfield	19
Byram Street, Huddersfield	10
Lord Street, Huddersfield	6
John William Street, Huddersfield	32
Venn Street, Huddersfield	16
Ramsden Street, Huddersfield	8
St. Georges Square, Huddersfield	32
Zetland Street, Huddersfield	26
Railway Street, outside Estate Buildings, Huddersfield	32
Market Street, Outside Music Shop, Huddersfield	7
Market Square, Batley	8
Market Street, Huddersfield	24
New North Parade, Huddersfield	26

Foundry Street, Dewsbury	24
Mill Street East, Asda, Dewsbury	12
Longcause Way & Town Hall Way	6
North Gate, Dewsbury	6
South Street, Dewsbury	30
Wellington Street, Dewsbury	5
Ward Hill, Batley	15
Henrietta Street, Batley	24
Bradford Road, LaLas, Batley	8
Bradford Road, Frontier, Batley	16
Ludgate Hill, Heckmondwike	11
Queen Street, Mirfield	6
Greenside, Cleckheaton	14
Station Road, Batley	12
Station Road Batley (across from Auction Rooms)	13
St Tomas Road, Huddersfield	16
Market Place, Birstall	21
<b>Grand Total</b>	<b>567</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 Kirklees Rank-Based Hackney Carriage Market (Rows Sum to 100%)**

Period		Excess Demand (%)	Equilibrium (%)	Excess Supply (%)
Weekday	Day	15.3	57.6	27.1
	Night	7.7	75.6	16.7
Weekend	Day	3.9	66.7	29.4
	Night	13	74	13
ALL (including Sundays)		10	69.7	20.3

Source: TPI

- 3.8 Table 3.2 shows that, overall, the market exhibits equilibrium conditions in almost 70% of hours, the predominant market state. Excess Demand is observed, on average, in 10% of hours, while excess supply is experienced in 20.3% of hours.
- 3.9 Conditions are worst for the market during the weekday daytime and at their best during weekend daytime.
- 3.10 During weekday daytimes the proportion of hours exhibiting excess demand is 15.3%. 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)**

Rank	Passenger Departures	Hackney Departures	Average Passenger Delay	Average Hackney Delay
Towngate, Holmfirth	3	1	5	0
Cross Church Street	254	124	0	5377
Queens Street	0	13	0	6
Queens Gate, Huddersfield	0	0	0	0
Southgate, Huddersfield	2	10	105	6
Dundas Street. Outside Bus Station, Huddersfield	328	274	0	22
Lower Dundas Street, Huddersfield	576	467	0	7
Byram Street, Huddersfield	0	0	0	0
Lord Street, Huddersfield	139	83	4	5



Rank	Passenger Departures	Hackney Departures	Average Passenger Delay	Average Hackney Delay
John William Street, Huddersfield	1353	857	0	27
Venn Street, Huddersfield	0	2	0	0
Ramsden Street, Huddersfield	8	3	0	0
St. Georges Square, Huddersfield	1588	1205	0	29
Zetland Street, Huddersfield	133	274	0	2
Railway Street, outside Estate Buildings, Huddersfield	534	947	0	19
Market Square, Batley	0	0	0	0
Market Street, Huddersfield	700	457	0	16
New North Parade, Huddersfield	618	336	1	19
Foundry Street, Dewsbury	74	68	0	11
Mill Street East, Asda, Dewsbury	41	26	0	0
Longcause Way & Town Hall Way	5	8	0	4
North Gate, Dewsbury	28	49	0	4
South Street, Dewsbury	1897	1911	0	14
Wellington Street, Dewsbury	0	0	0	0
Ward Hill, Batley	257	285	0	49
Henrietta Street, Batley	240	99	0	0

Rank	Passenger Departures	Hackney Departures	Average Passenger Delay	Average Hackney Delay
Bradford Road, LaLas, Batley	3	4	0	5
Bradford Road, Frontier, Batley	800	362	0	6
Ludgate Hill, Heckmondwike	0	5	0	5
Queen Street, Mirfield	0	0	0	0
Greenside, Cleckheaton	36	48	0	12
Station Road, Batley	90	62	0	2
Station Road Batley (across from Auction Rooms)	118	88	2	1
St Tomas Road, Huddersfield	52	48	5	4
Market Place, Birstall	401	389	0	16
<b>Totals</b>	<b>10,278</b>	<b>8505</b>	<b>0.24</b>	<b>17.89</b>

Source: TPI

- 3.12 Table 3.3 shows that the busiest rank with respect to passenger and Hackney departures is the South Street, Dewsbury rank. The second busiest rank is the St Georges Square rank, which operates at 83% of this passenger demand and the third busiest the John William Street rank with passenger activity being 71% that of the South Street rank.
- 3.13 The average delays and total demands in the above table are calculated as follows, using St Georges Square, Huddersfield as an example.

**Table 3.4 Rank Observations undertaken at the Train Station**

Rank Name : St Georges Square Day: Thursday Date: 26/11 Time: 10:00-18:00

Hourly Time Period	Passenger & Cab Rank		Hourly Queue		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	6	6	0	33	0.00	27.50	0	2	0	1	0	FALSE	FALSE	FALSE
11-12	13	12	0	35	0.00	14.58	0	3	0	0	1	FALSE	FALSE	FALSE
12-13	0	0	0	27	0.00	0.00	0	3	0	0	1	FALSE	FALSE	FALSE
13-14	13	10	0	29	0.00	14.50	0	2	0	1	0	FALSE	FALSE	FALSE
14-15	24	14	0	34	0.00	12.14	0	2	0	1	0	FALSE	FALSE	FALSE
15-16	9	4	0	27	0.00	33.75	0	3	0	0	1	FALSE	FALSE	FALSE
16-17	27	20	0	36	0.00	9.00	0	3	0	0	1	FALSE	FALSE	FALSE
17-18	5	5	0	36	0.00	36.00	0	3	0	0	1	FALSE	FALSE	FALSE
<b>Total</b>	<b>97</b>	<b>71</b>	<b>0</b>	<b>257</b>	<b>0.00</b>	<b>18.10</b>	<b>0</b>	<b>21</b>	<b>0</b>	<b>3</b>	<b>5</b>	<b>0</b>	<b>0</b>	<b>0</b>

Rank Name : St Georges Square Day: Wednesday Date: 25/11 Time: 19:00-03:00

Hourly Time Period	Passenger & Cab Rank		Hourly Queue		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			
19-20	16	14	0	145	0.00	51.79	0	8	0	0	1	FALSE	FALSE	FALSE
20-21	23	19	0	159	0.00	41.84	0	11	0	0	1	FALSE	FALSE	FALSE
21-22	13	13	0	172	0.00	66.15	0	11	0	0	1	FALSE	FALSE	FALSE
22-23	29	22	0	185	0.00	42.05	0	13	0	0	1	FALSE	FALSE	FALSE
23-24	30	20	0	181	0.00	45.25	0	8	0	0	1	FALSE	FALSE	FALSE
24-01	9	4	0	51	0.00	63.75	0	3	0	0	1	FALSE	FALSE	FALSE
01-02	0	0	0	30	0.00	0.00	0	2	0	1	0	FALSE	FALSE	FALSE
02-03	0	0	0	15	0.00	0.00	0	3	0	0	1	FALSE	FALSE	FALSE
<b>Total</b>	<b>120</b>	<b>92</b>	<b>0</b>	<b>938</b>	<b>0.00</b>	<b>50.98</b>	<b>0</b>	<b>59</b>	<b>0</b>	<b>1</b>	<b>7</b>	<b>0</b>	<b>0</b>	<b>0</b>

Rank Name : St Georges Square Day: Saturday Date: 5/12 Time: 10:00-18:00

Hourly Time Period	Passenger & Cab Rank		Hourly Queue		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	8	7	0	72	0.00	51.43	0	3	0	0	1	FALSE	FALSE	FALSE
11-12	10	6	0	84	0.00	70.00	0	3	0	0	1	FALSE	FALSE	FALSE
12-13	1	1	0	57	0.00	285.00	0	9	0	0	1	FALSE	FALSE	FALSE
13-14	10	7	0	101	0.00	72.14	0	9	0	0	1	FALSE	FALSE	FALSE
14-15	7	3	0	90	0.00	150.00	0	8	0	0	1	FALSE	FALSE	FALSE
15-16	19	11	3	119	0.79	54.09	3	8	1	0	1	19	FALSE	FALSE
16-17	30	19	0	129	0.00	33.95	0	9	0	0	1	FALSE	FALSE	FALSE
17-18	30	14	0	75	0.00	26.79	0	8	0	0	1	FALSE	FALSE	FALSE
<b>Total</b>	<b>115</b>	<b>68</b>	<b>3</b>	<b>727</b>	<b>0.13</b>	<b>53.46</b>	<b>3</b>	<b>57</b>	<b>1</b>	<b>0</b>	<b>8</b>	<b>19</b>	<b>0</b>	<b>0</b>

Rank Name : St Georges Square Day: Friday Date: 27/11 Time: 19:00-03:00

Hourly Time Period	Passenger & Cab Rank		Hourly Queue		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			
19-20	38	30	0	105	0.00	17.50	0	6	0	0	1	FALSE	FALSE	FALSE
20-21	27	26	0	115	0.00	22.12	0	6	0	0	1	FALSE	FALSE	FALSE
21-22	30	25	0	123	0.00	24.60	0	10	0	0	1	FALSE	FALSE	FALSE
22-23	18	14	0	103	0.00	36.79	0	10	0	0	1	FALSE	FALSE	FALSE
23-24	70	58	0	97	0.00	8.36	0	5	0	0	1	FALSE	FALSE	FALSE
24-01	51	37	0	26	0.00	3.51	0	0	0	1	0	FALSE	FALSE	FALSE
01-02	4	4	0	0	0.00	0.00	0	0	0	1	0	FALSE	FALSE	FALSE
02-03	16	13	7	28	2.19	10.77	4	0	1	0	0	16	16	FALSE
<b>Total</b>	<b>254</b>	<b>207</b>	<b>7</b>	<b>597</b>	<b>0.14</b>	<b>14.42</b>	<b>4</b>	<b>37</b>	<b>1</b>	<b>2</b>	<b>5</b>	<b>16</b>	<b>16</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 Train Station**

		Number of Hours	Total Passengers	Average Passenger Delay	Total Hackneys	Average Hackney Delay
Mon-Fri	DAY	12	97	0	71	18.10
Mon-Thu	NIGHT	8	120	0	92	50.98
Sat Day	DAY	8	115	0.13	68	53.46
Fri-Sat	NIGHT	8	254	0.14	207	14.42
			<b>Est. Weekly Passengers 1588</b>		<b>Est. Weekly Hackneys 1205</b>	
<b>Overall Weighted Average Passenger Delay</b>						<b>0.05</b>
<b>Overall Weighted Average Hackney Delay</b>						<b>28.87</b>

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

97 X (5 Days)	=	485
120 X (4 Nights)	=	480
115 X (Sat Day)	=	115
254 X (2 W/End Nights)	=	508
Total (1 Week)	=	1588

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:

97 X 5 X (Average Passenger Delay of 0)	=	0
120 X 4 X (0)	=	0
115 X (0.13)	=	14.95
254 X 2 X (0.14)	=	71.12

Total = 86.07 and this / 1588 = 0.05 minutes weighted average passenger delay at this rank.

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

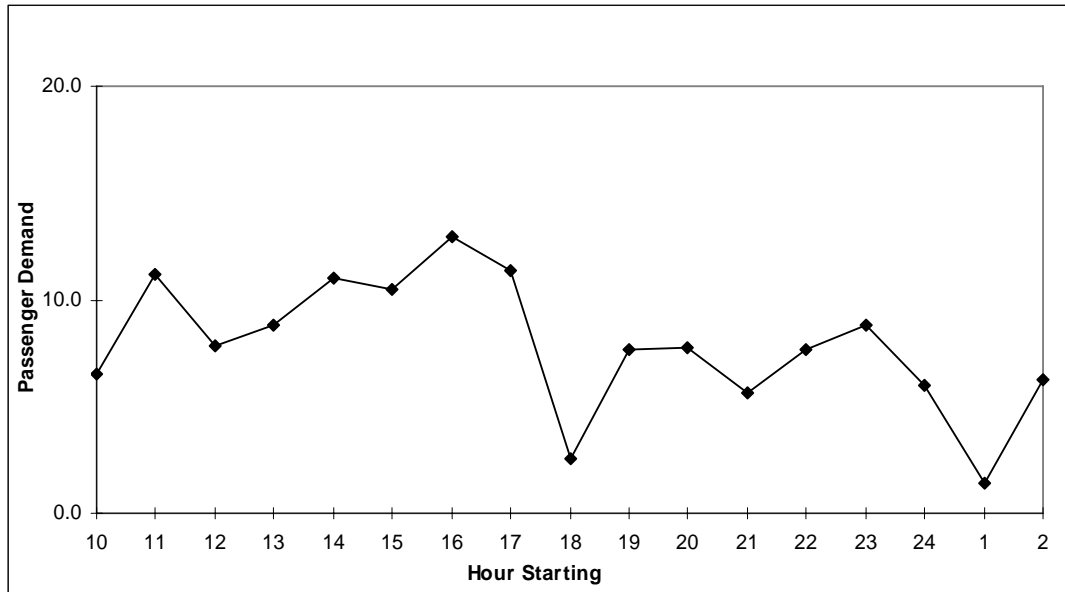
3.16 An Average Passenger Delay across all the ranks of 0.25 minutes is then calculated from the sum of multiplying the weekly passenger departures at each rank by the average passenger delays at that rank, (i.e. 1588\*0.05 for St Georges Square), divided by the total weekly passengers at all ranks.

3.17 Overall the observations suggest that in total there are approximately 10024 passenger departures and 8381 Hackney departures per week from all the ranks in Kirklees and that on average each passenger waits 0.25 minutes for a Hackney. Hackneys wait for an average of 18.07 minutes for a passenger.

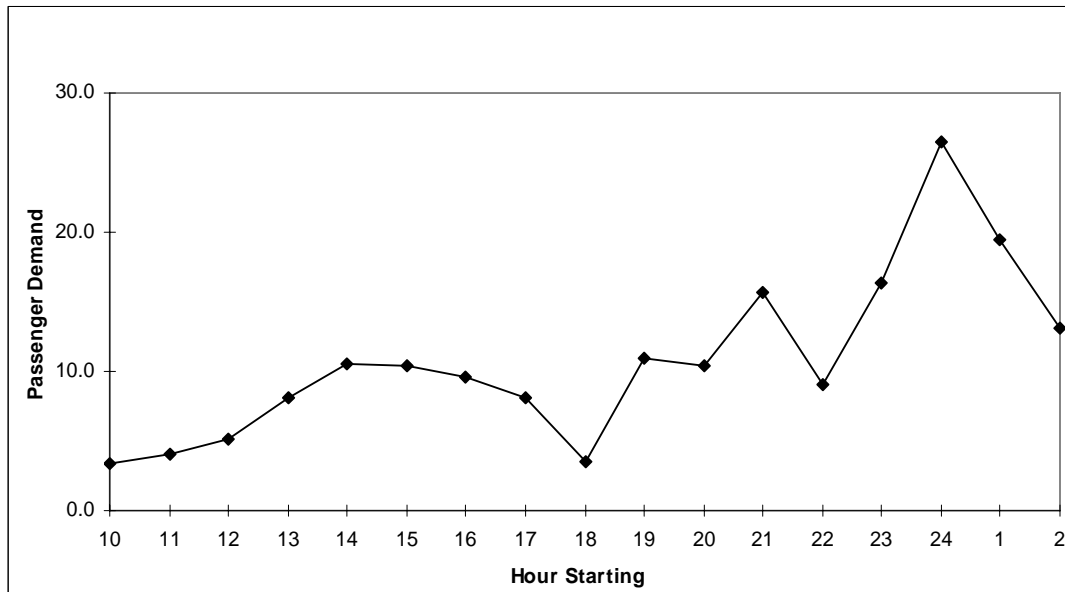
### **The Delay/Demand Profile**

- 3.18 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.
- 3.19 Figure 3.1 provides a graphical illustration of average daily passenger demand per rank from 07:00 Monday to 18:00 Friday. Figure 3.2 shows the equivalent information for the period 18:00 Friday to 02:00 Saturday.
- 3.20 Figure 3.1 shows passenger demand increases from 10:00-11:00, before dipping at midday. Demand then continues rising up until 16:00. After this time demand falls to before rising gradually until 23:00.
- 3.21 The situation at the weekend is shown in Figure 3.2. Demand rises gradually until 14:00 where it begins to slowly decline. From 18:00 demand begins to rise and peak sharply throughout the night at 21:00 and 00:00, after which demand drops off.
- 3.22 The two profiles are combined and factored accordingly to represent average weekly profiles in Figure 3.3. The figure shows that, overall, demand in Kirklees 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.
- 3.23 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 10:00-02:00 weekend periods, respectively.
- 3.24 During the 10:00 Monday to 18:00 Friday period, minimal passenger delay occurs. The peak passenger delay of 18 occurs at 21:00 on a weekday night.
- 3.25 During the 18:00 Friday to 02:00 Saturday period passenger delays are experienced between 12:00 and 14:00 and at 16:00, 19:00 and midnight. The peak passenger delay of over 20 minutes occurs between 15:00-16:00 on a weekend evening.
- 3.26 Figure 3.6 provides an illustration by time of day for the weekday and weekend periods combined.

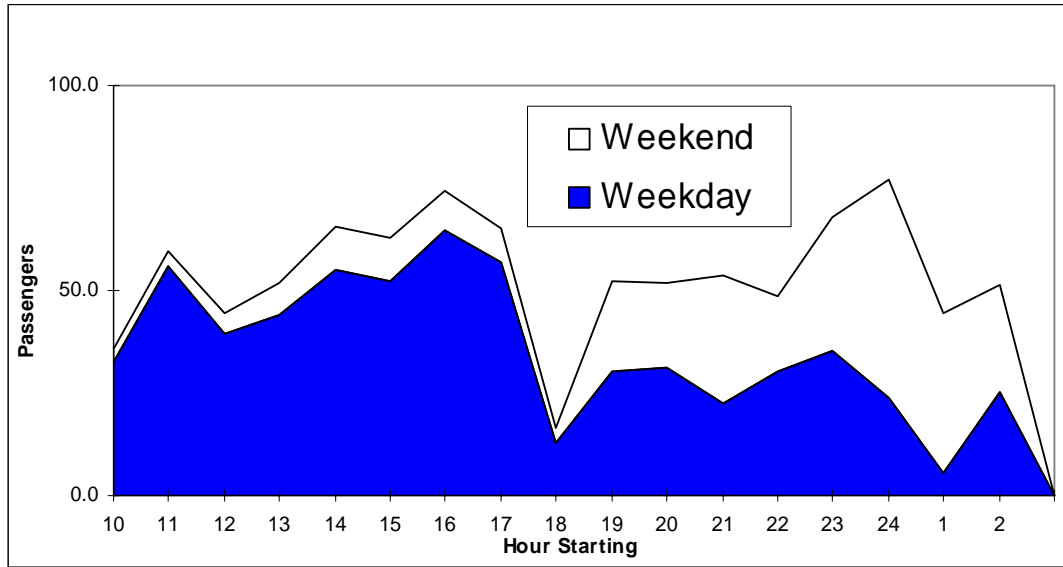
**Figure 3.1 Average Daily Passenger Demand across all Ranks (1000-0200) for the Weekly period (Mon-Fri Inclusive)**



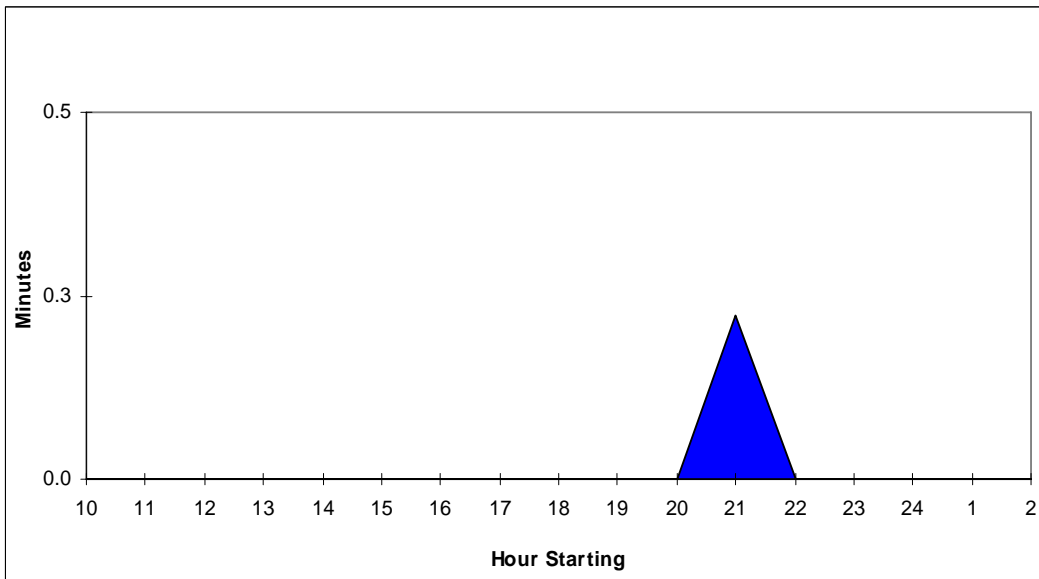
**Figure 3.2 Average Daily Passenger Demand across all Ranks (1000-0200) for the Weekend Period**



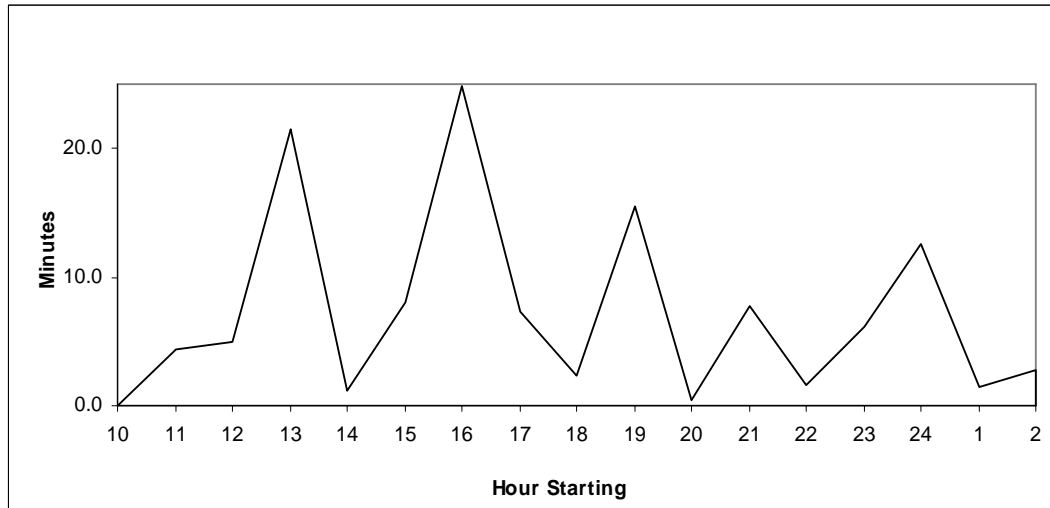
**Figure 3.3 The Average Week, Passenger Demand for all Ranks (1000-0200)**



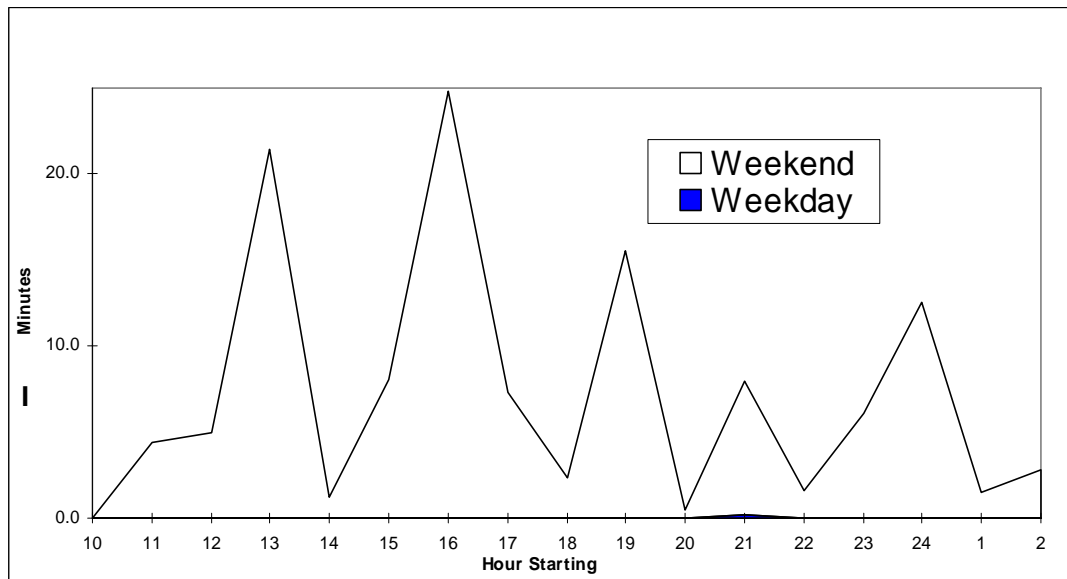
**Figure 3.4 Average Daily Passenger Delay (1000-0200) or the Weekly period (Mon-Fri Inclusive)**



**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

3.27 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 the rank in question was greater than or equal to one minute (P1); and
- 4 whether the demand profile is highly peaked (HP).

3.28 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 Kirklees is 22:

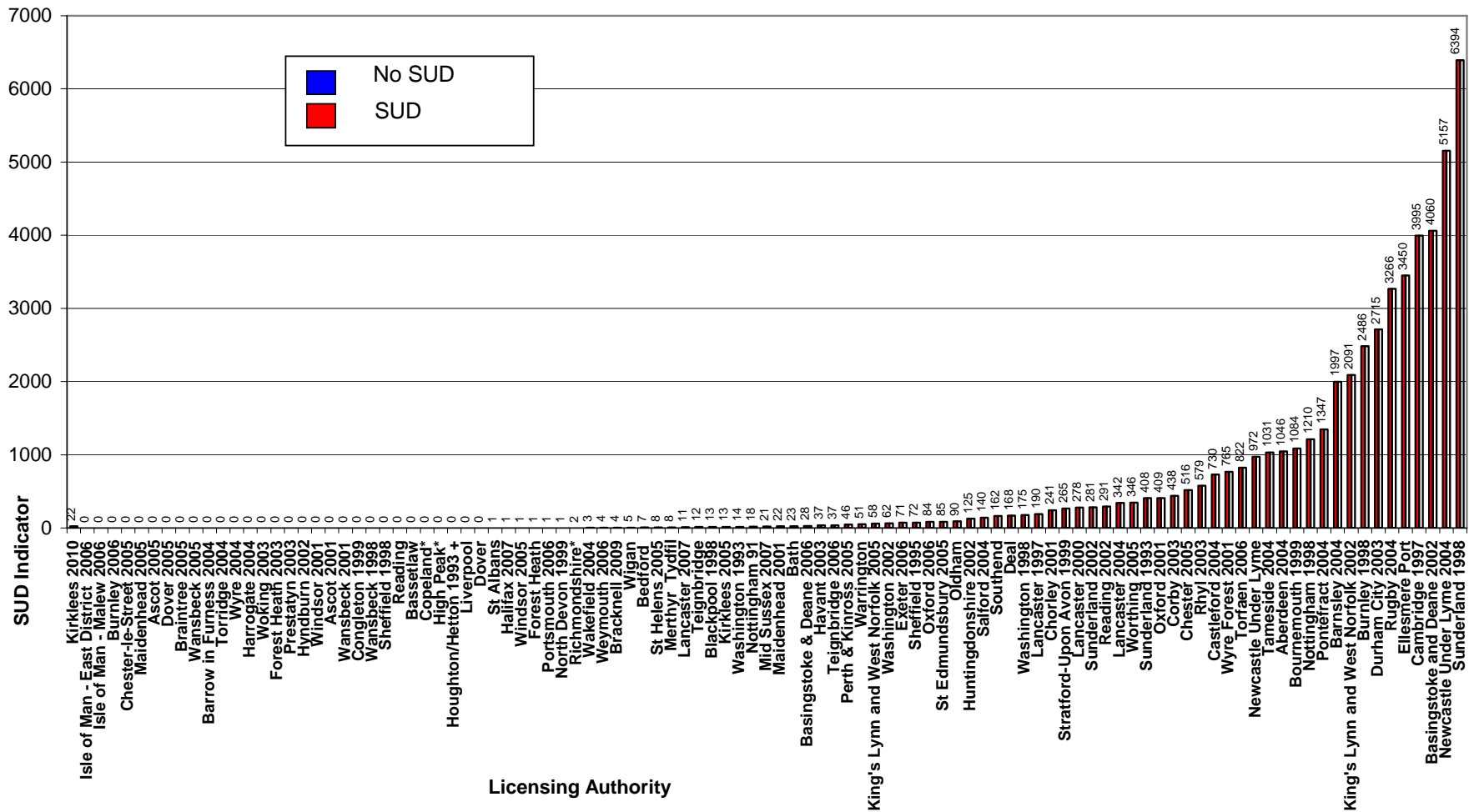
$$\begin{aligned} \text{ISUD} &= \text{APD} \times \text{ED} \times \text{P1} \times \text{HP} \\ &= \mathbf{0.78 \times 15.3 \times 23.6 \times 0.5 = 22} \end{aligned}$$

3.29 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 Kirklees is 22 which results in a conclusion of there being no significant unmet demand in the rank based taxi market.

3.30 Figure 3.7 shows the Significant Unmet Demand (SUD) Indicator Value in Kirklees compared with over 100 other Authorities. It can be clearly seen that the location of the Kirklees ISUD is in the range suggesting that there is **not Significant Unmet Demand for Hackney Carriages at ranks in the Kirklees Metropolitan Borough.**

Figure 3.7

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



## Comparison with other authorities

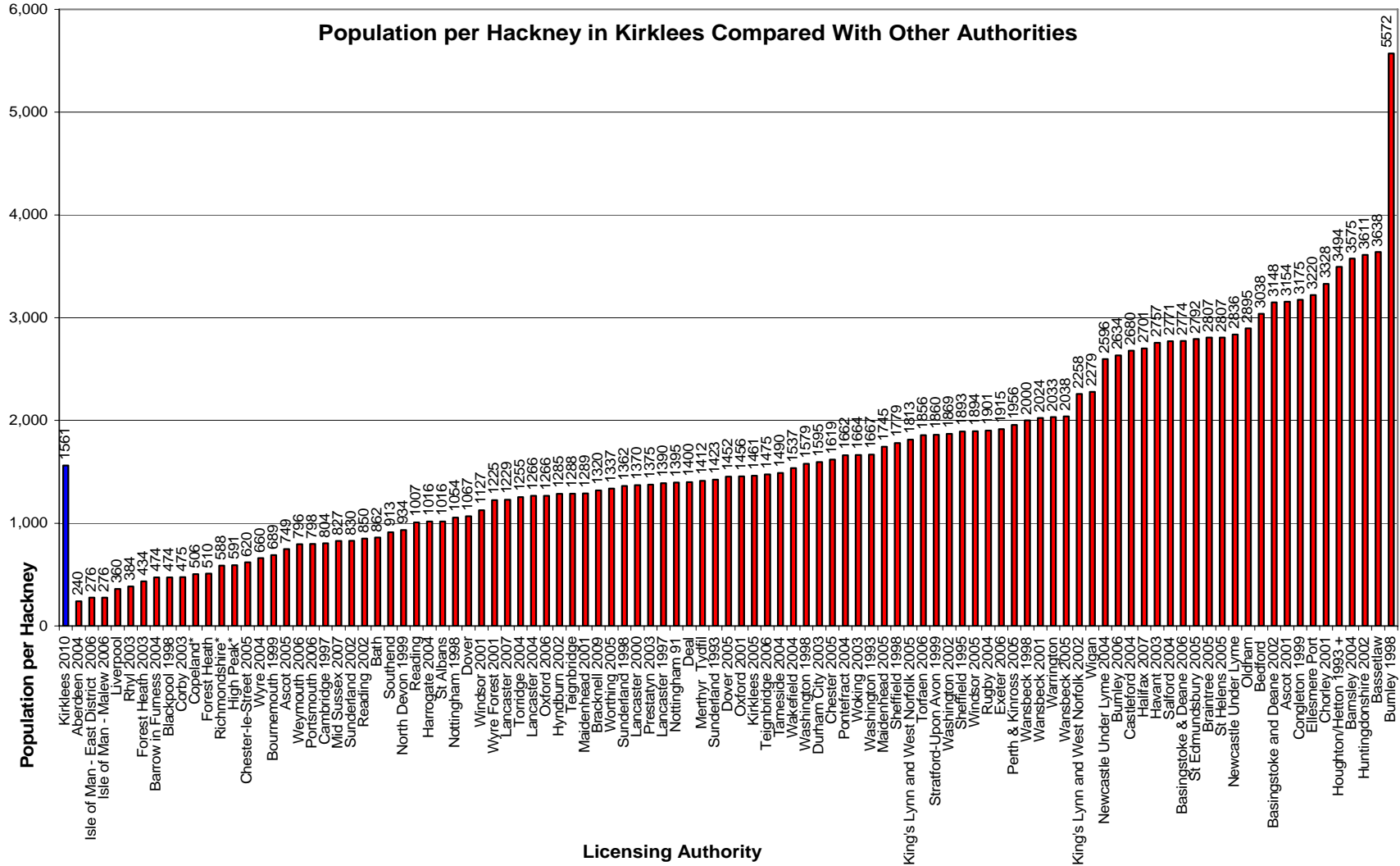
- 3.31 Any comparisons between authority areas should be treated with some caution. Areas vary widely according to population density, total population, public transport provision, car ownership and many other socio-economic and physical characteristics. However, previous studies undertaken over time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

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

	Population per Hackney	% pax waiting at ranks	% pax waiting <sup>3</sup> 1 minute	% pax waiting <sup>3</sup> 5 minutes	Average Passenger Delay in min	Average Hackney Delay in min	% Excess Demand
<b>Kirklees</b>	1,561	12.67	11.56	1.51	0.25	18.07	10
<b>Average for 100 others</b>	1,669	39.09	23.04	5.88	1	12.47	8.77

- 3.32 The population supplied by each Hackney in Kirklees is 1,561, compared to the average of 1,699 for the 100 other districts cited.
- 3.33 All other indicators also demonstrate Kirklees 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 Kirklees is just under 6 minutes above average and percent of excess demand which is almost 2% above the average.
- 3.34 Figure 3.8 overleaf shows the Population per Hackney in Kirklees compared to other Authorities.

Figure 3.8



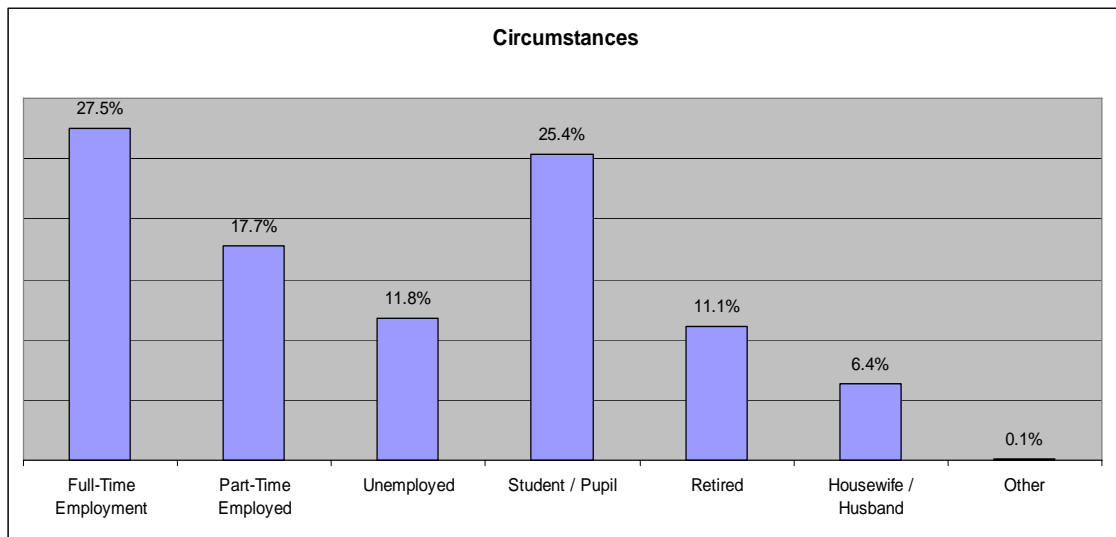
## 4.0 ON STREET SURVEY

### Introduction

- 4.1 A public attitude survey was undertaken in key town centre locations across Kirklees 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 users and non-users throughout different parts of Kirklees. The survey structure comprised three 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 identified peoples' views on the Taxi Marshals used in Kirklees and the third 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.

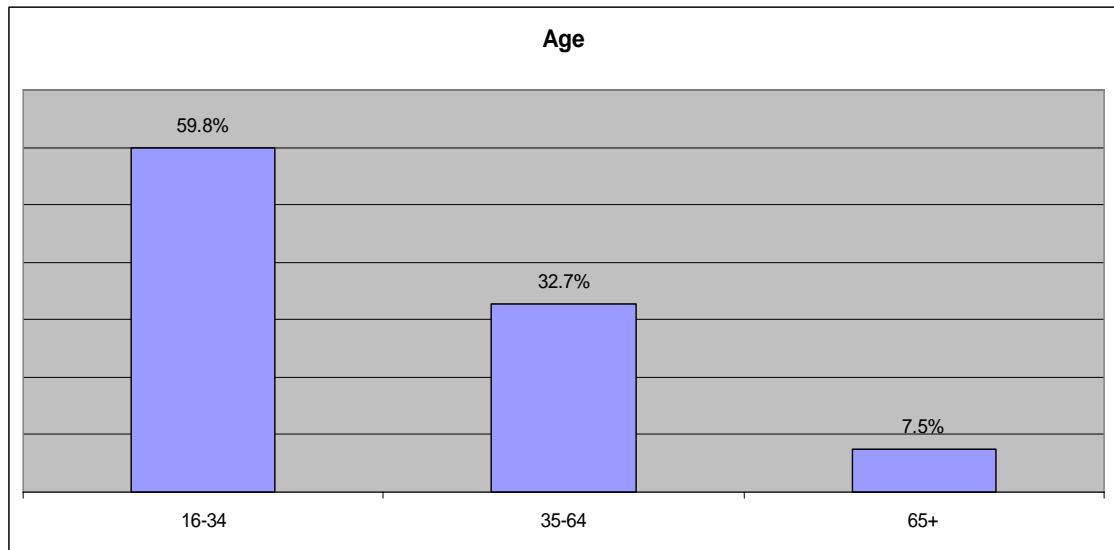
### Demographics

- 4.3 Of the respondents 27.5% were employed on a full time basis, with 17.7% in part-time employment. 25.4% of those who were questioned were students/pupils, 11.1% were retired and 7% were currently unemployed.



Source: TPI

- 4.4 Of the respondents 59.8% were in the 16-34 year age group, with 32.7% in the 34-65 year age group. 7.5% of those who were questioned stated that they were retired.

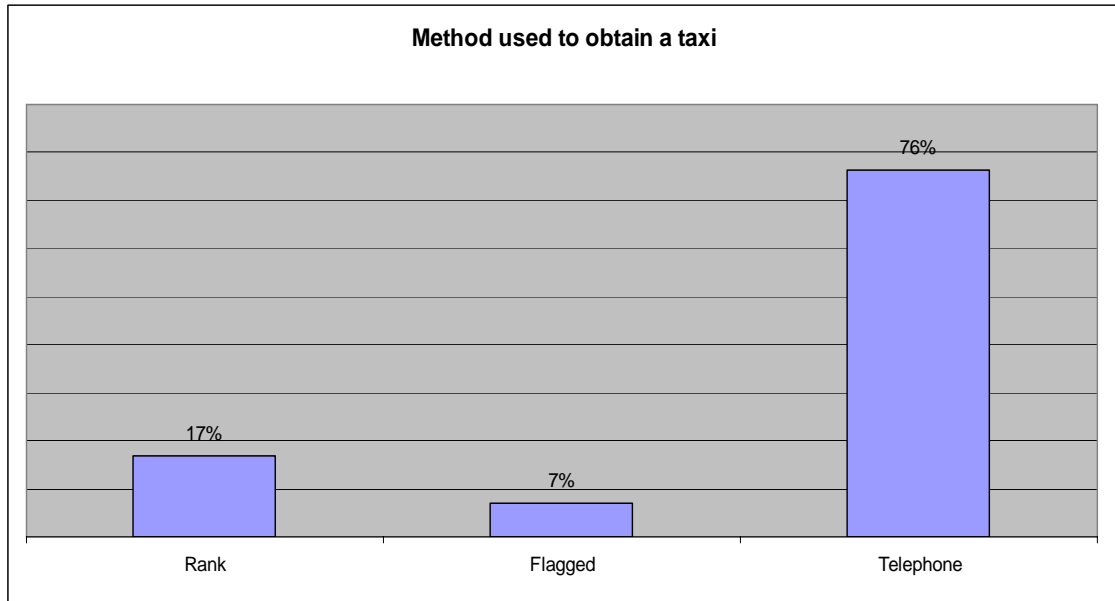


Source: TPI

- 4.5 37% of respondents were male and 63% female. The majority of survey respondents, (88%), were permanent residents in the local area, whilst 12% were visitors to the town.

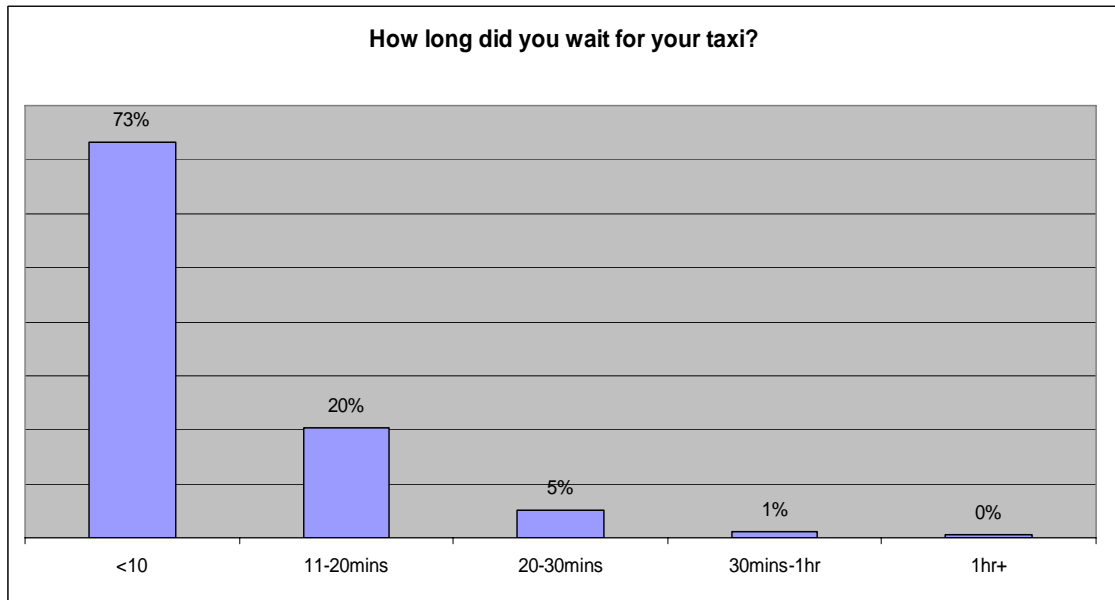
**Characteristics of the most recent trip made within the last three month period**

- 4.6 Asked if the respondent had made a journey by taxi in the last three months, 99% said they had, with the remaining 1% of respondents stated that they had not used a taxi within the last three months.
- 4.7 Respondents were asked how they made their last taxi journey. There were 8% of respondents who made the trip in a Hackney Carriage whilst 92% of respondents stated that they had used a PHV.
- 4.8 Of those who indicated that they had used a taxi in the last three months 17% obtained a taxi at a rank, 7% flagged down a vehicle and 76% booked a taxi by phone



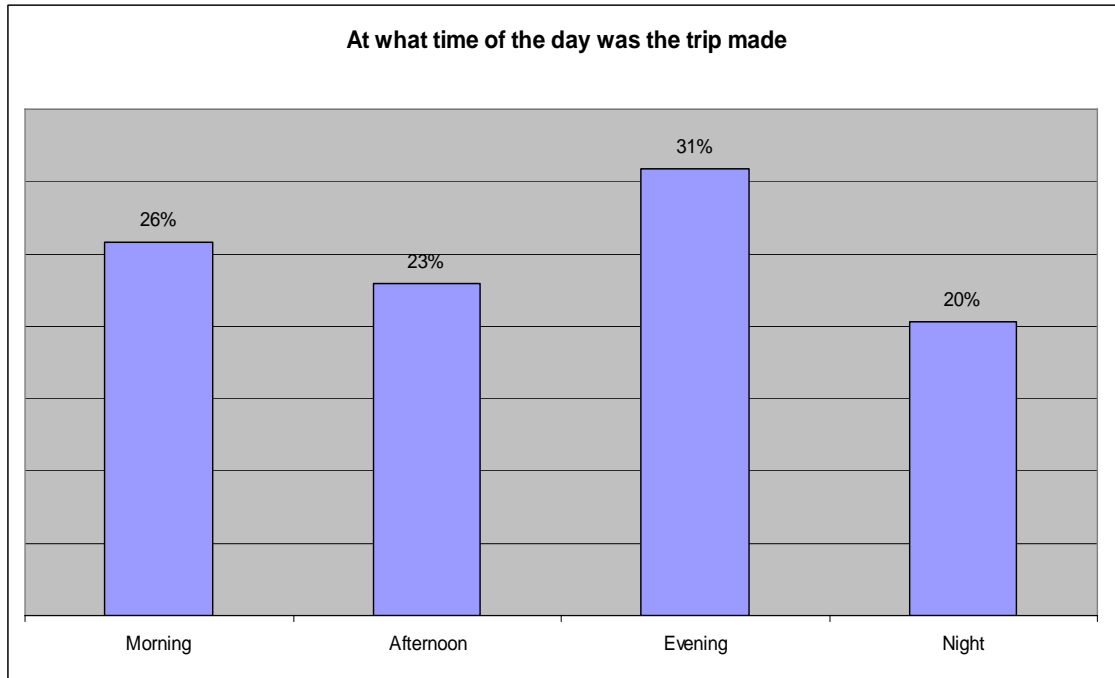
Source: TPI

4.9 73% of the respondents stated they they waited less than 10 minutes for their taxi to arrive. 20% said that they waited between 11 and 20 minutes for the taxi. No respondents waited more than an hour for their vehicle.



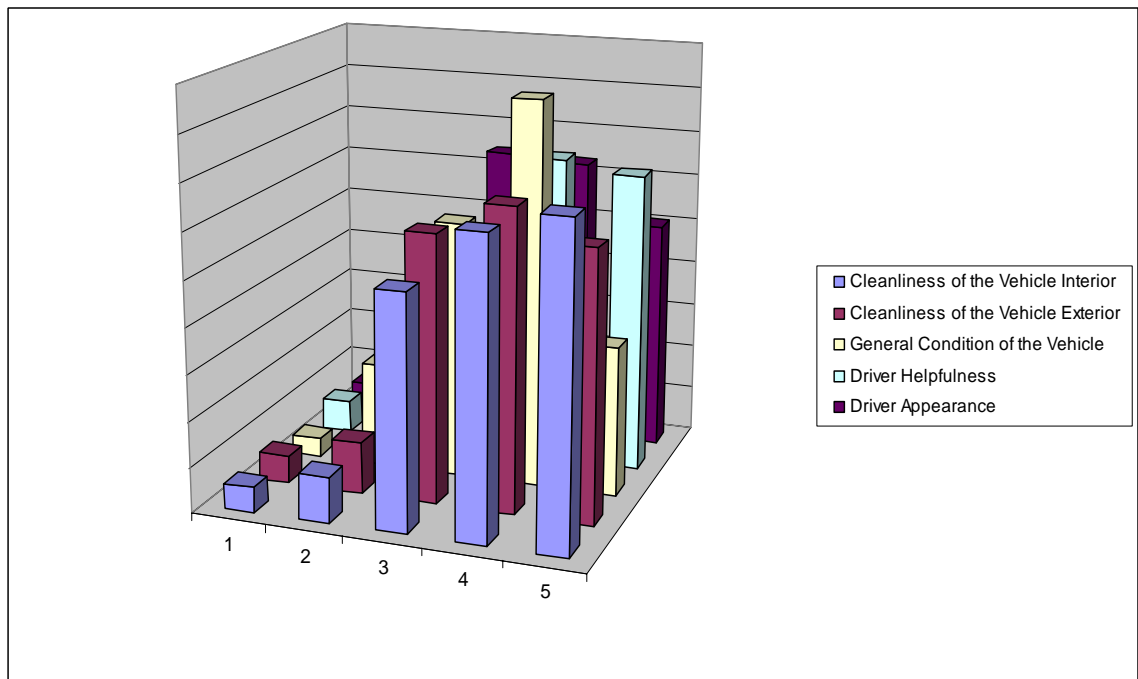
Source: TPI

4.10 The spread across the times of the day taxis were used for journeys was fairly even, with 26% using taxis in the morning, 23% using taxis in the afternoon and 31% using taxis for journeys in the evening. The remaining 20% used taxis for journeys at night.



Source: TPI

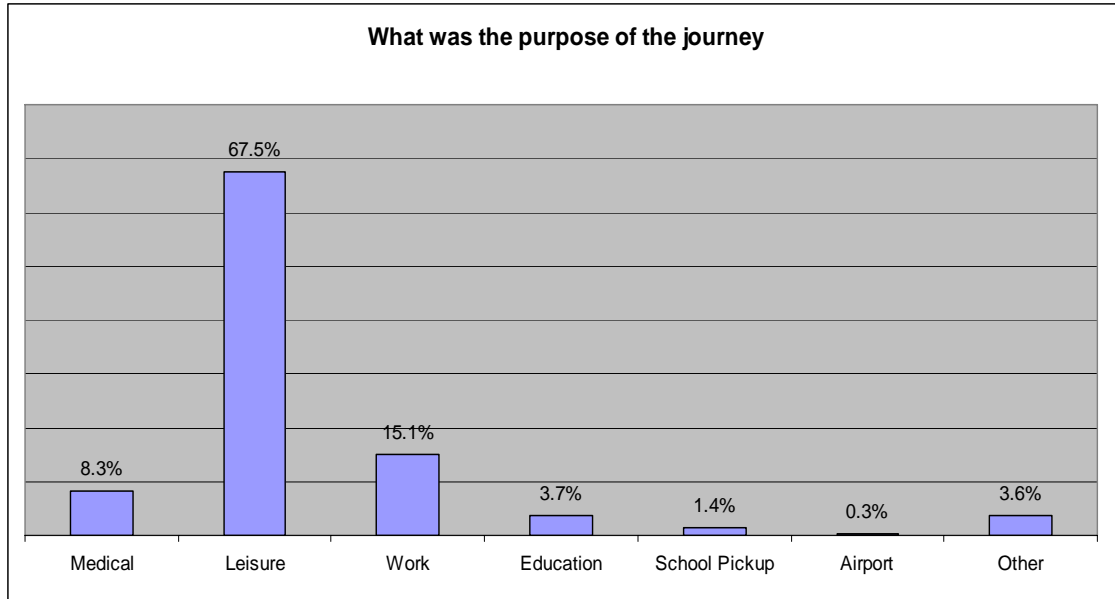
4.11 Respondents were asked to rate their trip for cleanliness of the vehicle both inside and out, the general condition of the vehicle, and the taxi drivers helpfulness and appearance. A scale of 1 to 5 was used with 1 being very poor, 3 being average, and 5 being very good. The results are shown on 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 hackney, 67.5% had done so for the purpose of Leisure. Work was cited as the second most popular reason to use a taxi. Journeys for medical purposes were cited by 8.3% with a further 3.7% stating they used a taxi for Education.

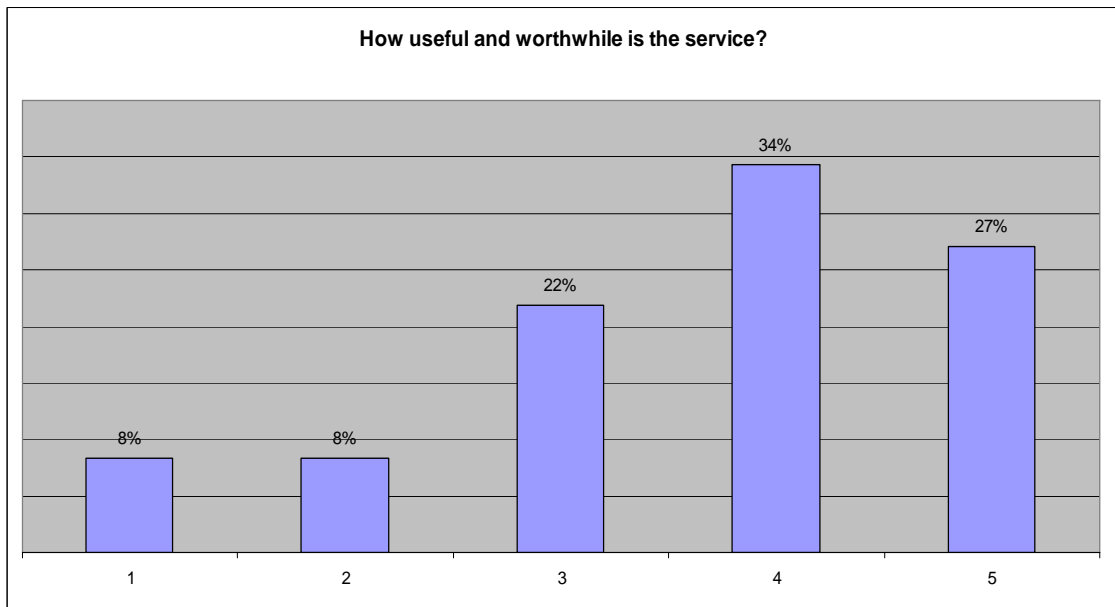


Source: TPI

**Taxi Marshalls**

4.13 As part of the public attitude survey respondents were asked if they were aware of the Taxi Marshal Service. Of the 690 valid replies only 13% stated that they had and the remaining 87% said they had not heard of the service.

4.14 96 respondents rated the service, with 34% saying the service was good and 27% saying the service was very good. 16% thought the service was poor or very poor.

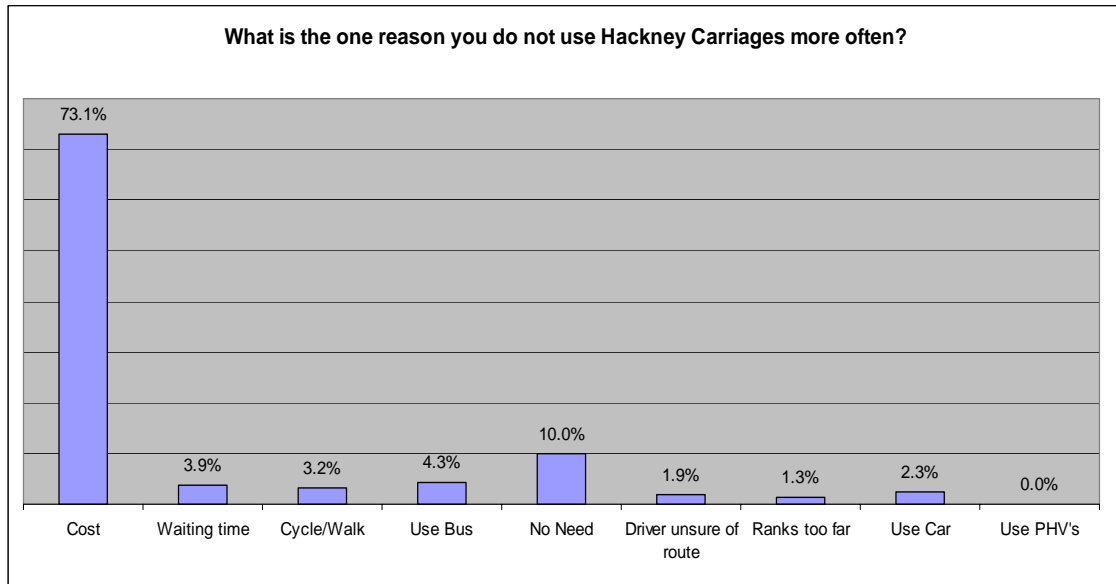


Source: TPI

4.15 Of the respondents who replied only 13% had used the service, the remaining 87% had not.

### Hackney Carriage Use

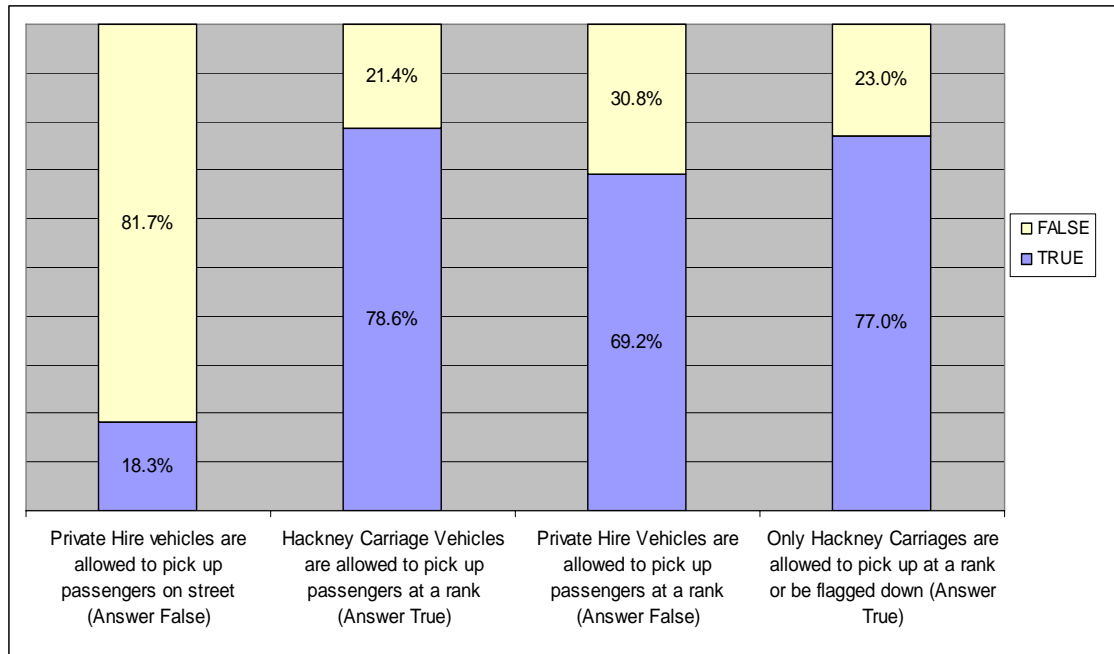
4.16 To determine overall opinions toward the use of Hackneys, all respondents were asked to identify the principal factors which limit their use of taxis. Of the 520 valid responses, results suggested the main limitation was cost (73.1% of responses). 10% of responses stated that they had no need to use a taxi, 4.3% preferred to use travel by bus. Other significant deterrents were the respondents' preference to walk or cycle 3.2%) and 3.9% said that taxi use was limited by the waiting time. 2.3% of respondents preferred to use a car and 1.3% of people surveyed said that their taxi use was limited by the drivers knowledge of the local area.



Source: TPI

## Knowledge of Hackney Carriage

- 4.17 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.

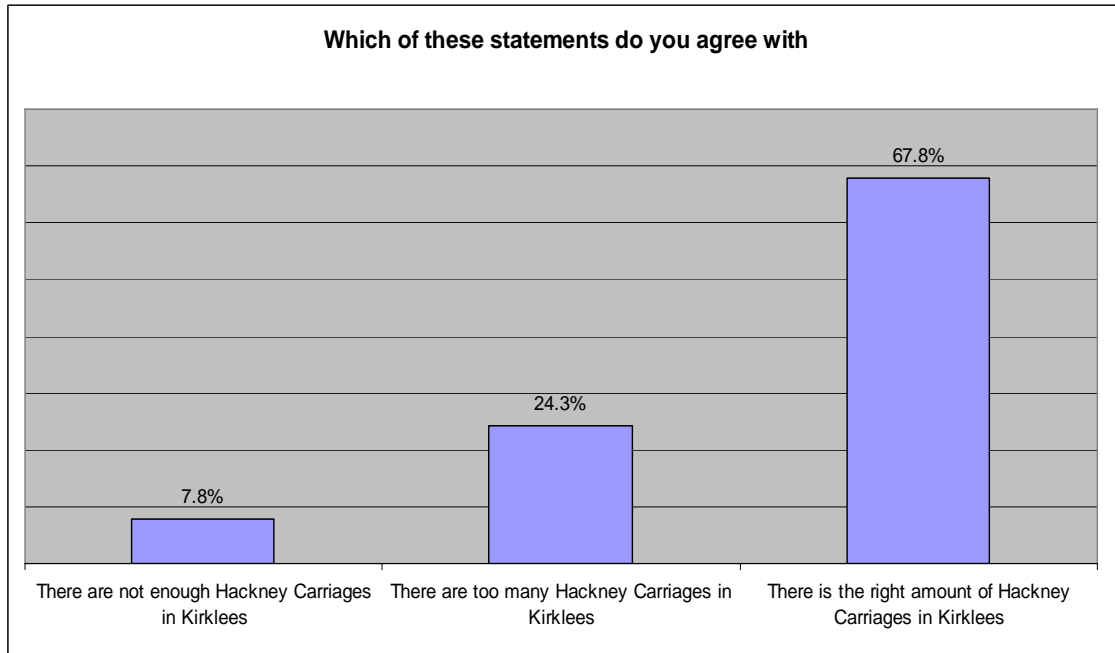


Source: TPI

- 4.18 The results show that approx 8 out of 10 people knew it was illegal to use a PHV drivers to pick up fares on the street. Approximately 8 out of 10 people knew that Hackney Carriages could pick up from a rank, but only 3 out of 10 people knew it was illegal for PHV drivers to pick up people from ranks. However, contradicting the above, approximately 8 out of 10 people said they knew that only Hackney Carriages could pick up fares at a rank or be flagged down on the street.

## Hackney Carriage Provision

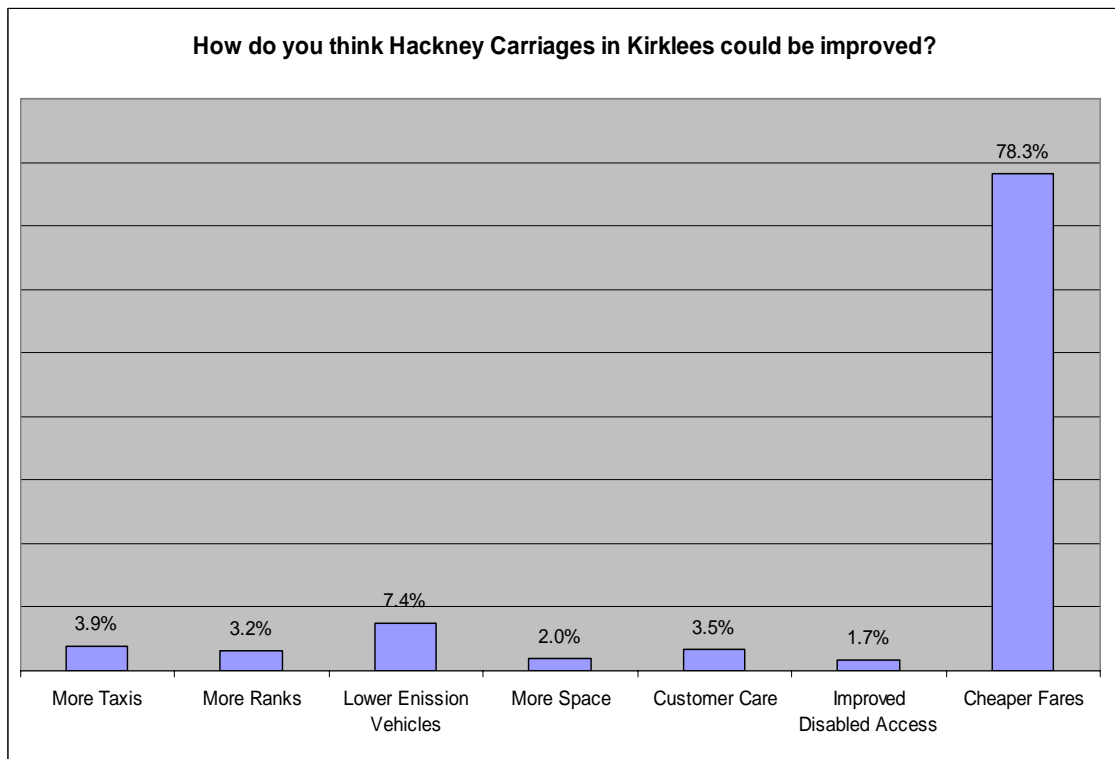
- 4.19 All respondents were asked whether they thought the level of Hackney Carriages in Kirklees was satisfactory. Of the 695 valid responses to the question, only 14% said the level was unsatisfactory with 58% stating that the level was satisfactory and 29% having no opinion.
- 4.20 When asked if there were enough hackneys in Kirklees, 67.8% of respondents said that in their opinion there were the right amount of vehicles, 24.3% said there were too many and only 7.8% thought there were not enough.



Source: TPI

**Potential for improvement**

4.21 The survey asked respondents what improvements they would like to see to Hackney Carriage services in Kirklees.



Source: TPI

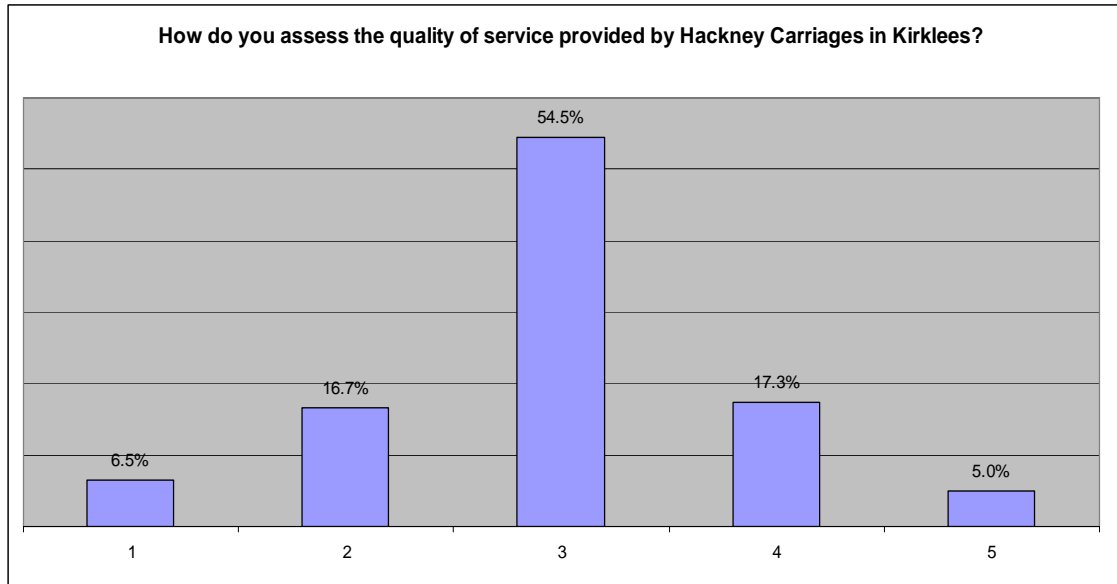
- 4.22 The most often cited improvement was cheaper fares (78.3%). The only other significant suggestion for improvement were the increased use of lower emission vehicles (7.4%).
- 4.23 Respondents were also asked whether there were any locations where they would like new ranks introduced. Of the 700 who replied to the survey 13% stated that they would like a new rank to be introduced. Below is a list of the places suggested.

**Table 4.3 Suggested Locations for New Ranks**

Location	Frequency
By the Yorkshire and HSBC Banks	1
Fartown	1
Fixby	2
Birkby	3
Market Place	10
University	10
College	3
Kings Gate Centre	7
Cross Church Street	1
Tescos	4
Sainsburys	4
Fitzwilliam Street	1
Town centre in general by Town Hall, pubs and clubs	15
Leeds Road	2
Bradford Road	3
Netherton	1
Kings Mill Lane	1
Cambridge Road	1
Train Station	3
Lockwood	2
Queens Road	1
Marsden	3
By the Stadium	1
Almondbury	1
Ainley Top	1
Zetland Street	1
Paddock	1
Ashenhurst	1
Thornton Lodge	1
Other Supermarkets	2
Kings Bridge Road	4
Cowlersley Village	1
Brighouse	1
Greenhead Park	1

Source: TPI

4.24 Respondents were asked to rate the quality of the service provided by taxis on a scale of 1 to 5 (with 1 being very poor, and 5 being very good). Of the 664 valid replies, 5% assessed the service to be very good, 17.5% rated the service as good with 54.5% thought the service was average. 23.2% of respondents said the service was poor or very poor.



Source: TPI

## 5.0 CONSULTATION

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- 5.1 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 by letter, emails, telephone and through arranged meetings
- 5.2 The following individuals and organisations were contacted for their views by telephone.
- The Department of Education, Department of Education and Social Services, Department of Highways and Transportation/Traffic Management and Council Planning Officers;
  - Gloucestershire County Council School Education Team (transport) ;
  - the Local Constabulary;
  - groups representing Retail Associations, Business and Commerce in the City, i.e. the local Chamber of Commerce;
  - groups representing tourism and marketing in the City, i.e. the local Tourist Information;
  - a wide range of transport stakeholders, e.g. rail/bus/coach providers and traffic managers;
  - local transport groups:- i.e. Transport 2000 etc.;
  - the Community Transport Partnership ;
  - student bodies/unions from universities and institutions of higher education in the Authority;
  - local residents groups of the City;
  - groups representing the retired and elderly in the City;
  - the health authorities including the local NHS Trust; and
  - groups representing people with disabilities in the City.

5.3 Responses were received from:

- Huddersfield Guild for the Disabled
- Mencap Day Centres in Kirklees
- Gloucestershire County Council's School Education Team
- Huddersfield South Community Police Officer
- West Yorkshire Travel Plan Network
- Mr John Beaumont, JRT
- Mr Jamil Mukhtar, Taxi Association Representative
- Mr. Makhau Singh, PHV Association Representative
- Tourist Information Centre

### **Mark Beswick, West Yorkshire Passenger Executive (WYPTE)**

- 5.4 Mark Beswick is a member of the team whose remit is to formulate Local Transport Plans (LTP). The LTP, which includes the Kirklees area, seeks greater integration of taxi provision with public transport networks in broad terms, but does not provide a specific strategy for taxis. Mark mentioned that this was being considered for the LTP3 to be published during 2010.
- 5.5 The WYPTE are represented on a taxi liaison group which meets every six months and includes local officers and political members, but Mr Beswick mentioned so far initial targets for the group had not been met. The liaison group advocated a promotional approach towards taxi operators, drivers, and passengers alike, with incentives around

safety and security issues. A grant of up to 50% was made available for drivers wanting to install CCTV equipment into their vehicles. Mr. Beswick said that the WYPTE were disappointed that currently, to his knowledge, there had been no take up of the scheme by taxi drivers or operators.

- 5.6 Leeds had been highlighted as the only area mentioned at the liaison group meetings, where excess cab numbers have been noted, with too few ranks and over ranking becoming a problem causing a negative effect on bus lanes and bus stops. He did not recall any over ranking or other issues mentioned relating to the Kirklees area.
- 5.7 Mr Beswick also mentioned that taxis would be included as a part of an integrated public transport approach to be set out in the new Local Transport Plan (LTP3) currently being compiled by Andy Chymera.

**Judith Anderson, Kirklees Council School Transport Team**

- 5.8 Ms Anderson outlined the departments' aims to provide school transport for children with special needs. Currently they use PSV, PHV and Hackney Carriages from a list of approved operators. Of this list approximately 10 to 15 are Hackney Carriage vehicles.
- 5.9 The department tenders for the contracts on average every 3 years. The last tender rounds were during summer 2006. The contracts were extended in 2009 for an extra year, and the department intend to re-tender the contracts from June 2010 onwards.
- 5.10 At the time of this survey the contracted driver rates are those confirmed in the 2006 contracts plus a 1 or 2% per year increase which is decided upon by the department on an annual basis dependant on the departments available funding.

**Mr John Beaumont, JRT**

- 5.11 Mr Beaumont is a PHV driver of 27yrs experience who usually works long distance fares to and from airports including Heathrow.
- 5.12 He is of the opinion that the amount of work for the trade, in general, has decreased, partially due to the closure of a large number of the pubs in the area, and also due to the increased number of out of town supermarkets promoting only one taxi operator to their customers.
- 5.13 Mr Beaumont is passionate about offering hackney carriage licenses to some PHV drivers who have or are able to drive buses or coaches. He says that this would allow them to provide a more demand responsive service similar to that operated in Greater Manchester
- 5.14 Mr Beaumont does not know of any locations where new ranks are needed. He would also like to see the license for some ranks re-issued to drivers who want to work from those locations, especially the rank at Holmes Firth. He stated that in his view the majority of drivers from outlying areas of Kirklees go to Huddersfield to work, where there are more fares readily available. Mr. Beaumont does not think that there are any security issues for taxis at the moment.
- 5.15 Mr Beaumont states that in his opinion there are enough wheelchair accessible vehicles in the Kirklees area, but that he feels that it is important for wheel chair users to have up to date information, on a regular basis, as to which taxi operators have wheelchair accessible vehicles.



### **Sergeant John McFadzean, Huddersfield South Community Police Officer**

- 5.16 Sergeant McFadzean stated that, in the Kirklees area, supply has been outstripping demand over the last twelve months. He stated that in his opinion the number of Hackney Carriages is adequate and that there are plenty, if not too many, PHV taxis currently working in the area.
- 5.17 The effects of the reduction in demand have been keenly felt, especially on Friday nights, where the demand has all but died off, Wednesdays and Saturday nights are still reasonably busy in Huddersfield, but there is still a noticeable decrease in demand in those days to.
- 5.18 Sgt McFadzean mentioned that PHV drivers are illegally plying for hire on street which can cause friction with Hackney Carriage drivers. He said that the police are working closely with the licensing department on an initiative to combat this.
- 5.19 When asked about security, Sgt McFadzean mentioned a very recent mugging in Huddersfield where a taxi driver was assaulted, but he said that overall violent crime has reduced significantly in the area.
- 5.20 Sgt McFadzean singles out Cross Church Street in Huddersfield as the main hot spot for trouble, including the taxi trade, in Huddersfield. The police would ultimately like this area to become pedestrian only from the hours of 8pm until 3pm, and the taxi rank on Cross Church Street to be moved to Kergate.
- 5.21 He mentioned the success of the barrier manned by the police on a Saturday night and during other busy periods. This barrier reduces the number of vehicles on that section of road. The barrier will only allow the PHV firm whose offices are currently located on Cross Church Street to enter the area.
- 5.22 Sgt McFadzean mentioned an incident where a hole closed off Cross Church Street to all vehicles for a two week period during 2009. With no vehicles and pedestrians walking just a little further to get a taxi at a rank located on Kergate, a significant reduction in violence in the area was noted.
- 5.23 Sgt McFadzean feels that CCTV cameras in cabs are a good idea, providing reassurance for drivers and a deterrent to reduce violence by taxi users. He would like to see a scheme put in place to help drivers cover the costs. He also mentioned that the fitting of screens in taxis can be beneficial.
- 5.24 Sgt McFadzean also mentioned that there was ongoing concern with over ranking at the rank outside the McDonalds restaurant, which is situated next to a build out for a pedestrian crossing. He said that drivers waiting for fares can, in some cases, interfere with bus flow.
- 5.25 He also raised concerns with the conduct of the drivers waiting outside the nightclub in Huddersfield, which is situated on the ring road. On Saturday nights Sgt McFadzean said that the police are constantly moving on taxis waiting on the ring road outside the club and blocking the ring road itself. He also mentioned the lack of adherence to road signs in that area, as drivers at right hand only turns, turn left to save time.
- 5.26 Sergeant McFadzean also mentioned that the PHVs were very expensive during peak hours, and he had heard of the prices being increased significantly on several occasions.

**Jackie Murray, Waverley Hall Day Centre, Huddersfield**

5.27 Ms Murray is very pleased with the service provided by taxis for the service users of the day centre. The service users arrange their own taxis to and from their residence. At present 6 of their users regularly use taxis to reach the day centre, all of which do not have any specific mobility issues. The service is very good, drivers are very pleasant and on time. There have not been any issues reported to the day centre regarding the taxi service provided to the day centre.

**Elaine Richardson, Branches Day Centre, Batley**

5.28 Ms. Richardson is very pleased, on the whole, with the service provided by the taxi companies contracted to the day centre and those booked privately by their service users. She states that the drivers are very polite and courteous, are happy to wait if they arrive earlier than their allocated time, and are patient with users with mobility issues.

5.29 The day centre use approximately 10 taxi companies to cover the transport needs of approx 6 to 8 people a day, who travel to the centre, and who do not have an allocated place on the day centres own 8 seater mini bus. The demand for taxis has increased at the centre due to the increase in service users after a nearby day centre was closed.

5.30 One of the service users presently books and pays for taxis privately to get to the centre. The service is provided by Dewsbury cars whose regular drivers provide good customer care. Ms Richardson mentioned that, when only relief drivers are available, some issues can occur as the service user needs a walking frame. On some occasions, the frame will not fit into the boot of saloon PHV cars and must be put on the back seat. On these occasions inexperienced drivers have become impatient and, in some cases, rude to the user. Ms Richardson would like to see more training for drivers around the needs of mobility impaired users, especially for inexperienced drivers, although she admits that these occasions are rare.

**Ann Peaker, Huddersfield Disabled Guild**

5.31 The Disability Guild use Mount Taxis for their users. Mrs Peaker is pleased with the service provided by the firm. She provides the firm with clear instructions for each user, explaining their mobility issues, and the help that will be required. The firm send drivers with experience and appropriate vehicles and she says that the drivers are polite and courteous.

5.32 She feels that some of the drivers may be charging their users higher fees than she would expect them to charge a normal user. This could be down to the extra time taken by mobility impaired users to enter and exit a taxi.

**Huddersfield Tourist Information Centre**

5.33 Huddersfield Tourist Information Centre said that they had no views on the taxi trade in the local area.

## **Consultation with local councillors**

5.34 The following councillors were contacted by email to gauge their views on the local taxi trade in their wards and the Kirklees area as a whole.

- Cllr Kath Pinnock
- Cllr John Smithson
- Cllr Christine Smith
- Cllr Molly Walton

5.35 Responses from Cllr Christine Smith and Cllr Kath Pinnock are shown below

### **Councillor Christine Smith, Kirklees Council, Kirkburton Ward,**

5.36 Cllr Smith commented that she thought the number of taxi licenses should be restricted and that she had been told by others that there were more than enough taxis available for the demand in the area and new applications should not be considered at this time.

5.37 Cllr Smith thinks that despite the high number of elderly or mobility impaired people living within her ward, that there were enough wheelchair accessible vehicles in the area to meet demand.

5.38 Cllr Smith feels that security issues around providing CCTV in taxi vehicles should be paid for by the drivers themselves, and that the cost should not be down to the local authority. She also thinks there are enough ranks across the Authority at the moment and has never received complaints to the contrary.

5.39 Cllr Smith would like to see more stringent spot checks of vehicles and the identification of the person driving the vehicles. She had been told of cases where when stopped, the Hackney Carriage driver was not identified as the licensed driver of that vehicle, and so would not be authorised by the local authority to drive the vehicle at any time. She was concerned about the safety for passengers and the invalidation of vehicle insurances in such cases.

5.40 Cllr Smith is also concerned about the numbers of hours each Hackney Carriage vehicle is used, and to their overall condition to be on the road. She would like to see any taxi driver immediately disqualified from driving for any road traffic violation.

### **Cllr Kath Pinnock, Kirkless Council, Cleckheaton Ward**

5.41 When asked for her views on the taxi trade in her ward Cllr Kath Pinnock consulted with the current Chair of the Kirklees Licensing and Safety Committee, and also ex members of the Committee to gather their views also

5.42 The general consensus of those who provided information to her, was the perception that there are too many Hackney and Private Hire vehicles in the Kirklees area. Some additional information was provided as follows

5.43 Around security issues, it was mentioned that taxi drivers had requested that the council fund CCTV for the taxis. A sum of £28,000 has been allocated from the Safer Stronger Communities budget to deal with this request. However, it has been agreed that priority will be given to those drivers who have been attacked and then those drivers who transport children in their vehicles.

- 5.44 Regarding provision of wheelchair accessible vehicles, it was suggested that there were currently approximately 50 hackney carriage available that are wheelchair accessible. There was no information provided about the number of private hire vehicles that can carry wheelchair users, although there were some. The thoughts were that this facility was not being advertised widely.
- 5.45 Ranks (improvements and locations) - This is currently being looked into by Kirklees Highways section at the request of taxi drivers.
- 5.46 Other comments included that from 1<sup>st</sup> January 2010, local taxis will be plated when they go for their MOT, and that from the same date a more rigorous driving test will be in place which will be carried out by the Driving Standard Agency rather than the in-house driving test as done previously. In order to obtain a badge, drivers will now be required to do a full days' written test at the college and half days training on wheelchair access issues.

### **Consultation with Taxi Association Representatives**

- 5.47 The taxi association representatives listed below were contacted by phone for an in depth discussion on a variety of issues.

- Mr Jamil Mukhtar
- Mr Makhau Singh
- Mr Amzad Nadeem
- Mr Mohammed Rajah
- Mr Akmel Hussain

- 5.48 Mr Mohammed Rajah requested to speak to a member of TPi staff personally. Two meetings were arranged for Mr. Rajah and three of his colleagues to speak to a senior member of TPi staff, to discuss issues relevant to the trade, at the Leeds Office. A variety of dates (up to six) were put forward on two occasions, along with contact details to confirm or alter meeting arrangements, but on both occasions this option was not taken up.

- 5.49 Mr Rajah also asked for questionnaires to hand out to other interested taxi trade association representatives. These questionnaires were provided on two occasions but no replies were received.

- 5.50 Verbal responses were received from:

#### **Mr Jamil Mukhtar, Taxi Association Representative**

- 5.51 Mr Mukhtar mentioned that he was under the impression that some of the observations were taken during Ede, and would not depict the normal day on the ranks.

- 5.52 He also pointed out that there were cases of over ranking at most ranks in Huddersfield, particularly around the bus station and rail station, where ranks are always full. Police regularly ticket drivers for over ranking in Huddersfield especially when taxis park in bus stops due to the lack of space at the ranks. Mr Mukhtar also mentioned that drivers finding that there is no work in north Kirklees come into Huddersfield to work, especially since de-zoning occurred

5.53 Mr Mukhtar is of the opinion there are enough wheelchair accessible taxis in the Kirklees area

**Mr. Makhau Singh, Association Representative, Huddersfield**

5.54 Mr Singh was very concerned about the increase in violence towards taxi drivers, citing the very recent mugging of a driver (also mentioned by Sgt Fadzean), and the high rate of none payers during the early hours.

5.55 He stated that he would encourage uptake from drivers for a proposed scheme where by the local authority provides a small grant towards the purchase of CCTV for taxi drivers. Mr Singh thinks that the uptake of drivers for such a scheme would be high after the recent incidents.

5.56 Mr Singh would also like to see an overhaul of the CCTV cameras in Huddersfield, especially around the Cross Church Street area, as in some cases the cameras have not been operational when incidents occur, resulting in no prosecutions.

5.57 Mr Singh would also like to see all clubs, bars and takeaways with in the area of Cross Church Street, closed by 3am, rather than the current closing time of 6am, to help reduce violence towards taxi drivers by passengers under the influence of alcohol.

5.58 He also acknowledges the good work done by the enforcement officers in the area, and commented that the level of incidents occurring, since enforcement officers extended their time on the ranks (from 2am to 4am), had greatly reduced.

5.59 Mr Singh said that in his opinion there are too many cabs in the Huddersfield area, with many taxi drivers travelling in from Dewsbury and Batley to work in Huddersfield, where there is a perception of more work. He would also like to see only one plate issued to one person. He stated that, in his opinion, the level of wheelchair accessible taxis in the area easily meets demand, and that he does not see driver training as a concern at the moment.

5.60 Mr Singh said that over the last twelve months his level of take home pay on the busiest Saturday nights, has decreased from £100 to approx £70 due to a decrease in demand. He would like to see PHV vehicles metered and use the same fare scale as the Hackney Carriages as there have been numerous occasions of over pricing by PHV drivers.

## 6.0 CONCLUSIONS

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### *Unmet Demand*

- 6.1 Based on Kirklees's rank observations the ISUD model shows a value of 22, as this is well below the threshold of 80 it is concluded that significant unmet demand for hackney carriages does not exist in the Kirklees rank based market.
- 6.2 The trade Associations consulted believe that demand in Kirklees has been reducing for some time and that the recession had compounded this. They also highlighted the trend for drivers based in smaller towns or the more rural parts of Kirklees, to go to Huddersfield looking for work.
- 6.3 A number of those consulted raised concerns about an incident where a taxi driver was attacked just prior to the study being undertaken and as a result were looking to recommend to drivers that they expect financial help from the council to install CCTV cameras in their vehicles. Mark Beswick, WYPTE, as a member of the Taxi Liaison Group would also like to see the trade take up this offer.
- 6.4 The one driver that responded to consultation expressed similar views. Asked why he thought the demand for taxis had reduced he cited the significant reduction in the number of pubs and clubs in the area. When asked about the accessibility on Kirklees for disabled access vehicles he stated that in his opinion there were enough, but would like to see more information given to the public about where and who to contact to obtain one.
- 6.5 This was also one of the points noted by Cllr Kath Pinnock when asked her views. Both Councillors mentioned that they thought there were too many taxis in the local area, had concerns about taxi drivers and their vehicles. Cllr Christine Smith would like more stringent spot checks for both drivers and their vehicles and Cllr Kath Pinnock welcomes the more rigorous driving tests to be introduced by the Driving Standards Agency.
- 6.6 Overall consultation with individuals and organisations, who book taxis on a regular basis, shows the trade in a very positive light. Some concerns arise with a perception of increased fares due to the time taken to allow mobility impaired users to enter or exit a vehicle, but it is noted that the more information a driver has regarding any special needs at the time of booking, the more pleasant the experience is for the driver and the fare paying passenger.
- 6.7 The findings of the consultation regarding the level of taxis in Kirklees were also highlighted by the results of the on street survey. Respondents were asked whether they thought the level of Hackney Carriages in Kirklees was satisfactory. Of the 695 valid responses to the question, only 7.8% said the level was unsatisfactory with 58% stating that the level was satisfactory and 29% not expressing an opinion. When asked if there were enough hackneys in Kirklees, 67.8% of respondents said that in their opinion there were the right amount of vehicles, 24.3% said there were too many and only 7.8% thought there were not enough.

### *Other Significant Issues*

- 6.8 In Kirklees the majority of taxi journeys undertaken by respondents to the survey was for leisure purposes (67.5%). When asked what improvements in provision they would like to see survey respondents highlighted cheaper fares (78.3%), and lower emission vehicles (7.4%). The cost of fares was also regarded as main factor limiting further use of taxis by respondents (73.1%).
- 6.9 The survey highlighted that, although the majority of the public know that it is illegal for a PHV driver to pick up fares on street (flag downs), they are under the perception that obtaining a PHV vehicle from a rank is legal.
- 6.10 Respondents to the on street survey were asked whether there were any locations where they would like new ranks introduced. Of those who replied the areas cited as the most popular for new rank locations were the town centre in general, by the market place and university.
- 6.11 Of the 664 respondents asked to rate the quality of service 22.5% stated the service was good or very good, 54.5% thought the service was average and 23.2% thought the service was poor or very poor. The value of the ISUD indicator for Kirklees is 22 which results in a conclusion of there being no significant unmet demand in the rank based taxi market.
- 6.12 The population supplied by each Hackney in Kirklees is 1,561, slightly better compared to the average of 1,699 for the 100 other districts cited.
- 6.13 All other indicators also demonstrate Kirklees 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 Kirklees is just under 6 minutes above average and percent of excess demand which is almost 2% above the average.

## 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	Most closely meets the preference of local consultation Most likely to sustain operator viability Most likely to maintain service quality No disruption in provision	Little scope for increased provision Least likely to encourage improvements in service provision Sustains the current 'premium' on hackney licenses
Increase the current limit on hackney licenses (in one)	Closely meets thrust of regional policy Provides for the impact on operator viability to be limited Can maintain or improve service quality through entry standards and controls Can address demand for more accessible taxis Can meet some demands for increased vehicle provision and market entry Can allow specific entry requirements to be placed alongside the new licenses available Continues regulation while allowing for growth in operations	Requires operators to incur costs of changing or obtaining new vehicles Offers neither the benefits of retaining a limit or of deregulating 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 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. Increasing the limit in one go risks introducing too many hackneys if the above calculations prove inaccurate
Increase the current limit on hackney licenses (in stages)	Most closely meets thrust of regional policy Provides for a controlled increase in hackney numbers Can maintain or improve	Requires operators to incur costs of changing or obtaining new vehicles Offers neither the benefits of retaining a limit or of deregulating Maintains the possibility of a court challenge by both those who do not think



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>
Remove the limit on hackney licenses	<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, Kirklees 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 following the issue of the latest DfT guidance to licensing authorities expected shortly.
- That consideration is given to the desire of on-street survey respondents for a new rank to be located by in Huddersfield Town Centre, by the University or by the market place in Huddersfield
- To address issues of cost, marketing, driver knowledge and standards consideration should be given to:
  - In the short term*
    - Establishing a shared taxi scheme
    - providing information on the difference between Hackneys and PHVs and promoting the use of legitimate vehicles
    - encouraging joint marketing between taxi operators
    - encouraging the take up of training opportunities available for taxi drivers
    - monitoring the impacts of this through customer surveys and random mystery passengers
  - In the longer term*
    - consideration of a more comprehensive quality taxi partnership (QTP) approach to increase liaison between the licensing authority, transport authority, police, passengers, other stakeholders and operators.
    - QTP can provide a framework for bringing about mutually beneficial improvements across the taxi sector, joint working and a quality mark to participating operators.
    - it can provide a vehicle to link the taxi sector more closely with the wider transport planning process and in particular at this time, the drafting of the next Local Transport Plan (2011 to 2016)
    - it can also be useful for facilitating discussion on how best to optimise supply to address peaks in demand, delays, congestion issues at ranks, environmental issues, the markets available and driver standards, etc.
- The anticipated useful life of the current survey is three years and we would recommend a further survey in Autumn 2012, in line with current Government guidance
- Future Transport Strategies and policy documents should take account of this report.

**APPENDIX 1**

**DfT Guidance 2006**

## **October 2006**

### **Introduction**

1. This Guidance is issued with the aim of assisting those local authorities in England and Wales that have responsibility for the regulation of the taxi and private hire vehicle (PHV) trades.
2. The Guidance follows the publication in November 2003 by the Office of Fair Trading of a market study of the regulation of taxis and PHVs in the UK. One of the recommendations of that study was that the Department for Transport (DfT) should produce guidance on best practice for the local licensing authorities concerned. The Guidance is issued in fulfilment of that recommendation.
3. However, it will be appreciated that 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.
4. The Department consulted on a draft version of the guidance in the autumn of 2005. We are grateful for all the views expressed on that draft. A summary of the consultation responses and our reaction to them is available on the DfT web-site. Some respondents to the consultation draft felt that the document should be made more prescriptive whilst others felt that the draft struck the right balance in this respect. Taxi and private hire vehicle legislation makes it clear that it is primarily for local licensing authorities to make decisions on the matters covered in this guidance. Furthermore, it is right that local circumstances and requirements are taken into account in making these decisions in each licensing area. So we have in general resisted the calls for the guidance to be more prescriptive. The key purpose of the guidance remains, as proposed in the draft version, to assist local decision-making by setting out the main considerations authorities might wish to take into account in reaching the right balance between costs and benefits in determining the licensing policies for their area.

### **The Role of Taxis and PHVs**

5. 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 2003 some 650 million journeys were made by taxi and PHV in Great Britain, and households spent around £3 billion on taxi and PHV journeys; spending by businesses and foreign visitors was a substantial extra figure. 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.
6. Taxis and PHVs are also increasingly used in innovative ways - for example as taxi-buses - to provide innovative local transport services (see paras 63-66).

### **The Role of Licensing: Policy Justification**

7. 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.
8. 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.
9. 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**

10. 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**

11. 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 Transport 2000 and other transport providers), womens' groups or local traders.

### **Accessibility**

12. Local licensing authorities will want to consider how accessible the vehicles they license as taxis are for disabled people (which includes - but is not limited to - people who need to travel in a wheelchair).

13. Licensing authorities will know that the Department has for some years now been working on proposals which would substantially improve taxi provision for people with disabilities. This work is continuing and an announcement will be made in due course. In the meantime licensing authorities are encouraged to introduce taxi accessibility policies for their areas. 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.

14. Different accessibility considerations apply as 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; but 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 makes 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.

### **Existing duties under the Disability Discrimination Act 1995 (DDA)**

15. Since 31 March 2001 licensed taxi drivers in England and Wales have been under 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 have been in force since 31 March 2004.

16. Enforcement of the duties 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.

## **Duties under the DDA , as amended by the Disability Discrimination Act 2005**

17. The Disability Discrimination Act 2005 amended the DDA 1995 to enable the Government to lift the exemption in Part 3 of that Act for operators of transport vehicles. The amendment allowed for the exemption to be lifted for different services, at different times and to different extents. Regulations have been made to lift the exemption in relation to vehicles used to provide public transport services, including taxis and PHVs, as well as for vehicle hire services and breakdown services. These Regulations come into force on 4 December 2006 and will effectively apply certain duties in Part 3 of the DDA 1995 to providers of transport services who provide such services through the use of specified vehicles. In order to meet these new duties, licensing authorities will be required to review any practices, policies and procedures that make it impossible or unreasonably difficult for a disabled person to use their services. The Disability Rights Commission (DRC) has produced a Code of Practice to explain the new Part 3 duties for the transport industry. This is on the DRC's website at [www.drc-gb.org](http://www.drc-gb.org). The Code is a supplement to, and should be read in conjunction with, the Code of Practice for Part 3 of the Act: Rights of Access to Services and Premises, which is also on the website. An example of responding to these new duties would be providing - for use in informing passengers - Braille cards to those drivers exempted from the duty to carry prescribed assistance dogs.

### **Vehicles**

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

18. 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.

19. 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.

20. 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. (There are at present only two designs of purpose-built taxi.) 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).

#### ***Imported vehicles: type approval (see also "stretched limousines", paras 26-28 below)***

21. 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 British Single 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.dft.gov.uk/stellent/groups/dft\\_roads/documents/page/dft\\_roads\\_506867.hcsp](http://www.dft.gov.uk/stellent/groups/dft_roads/documents/page/dft_roads_506867.hcsp).

### **Vehicle Testing**

22. 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 [www.tsoshop.co.uk/bookstore.asp?FO=1159966&Action=Book&From=SearchResults&ProductID=0115525726](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.)

### **Security**

23. 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. 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. There is extensive information on the use of CCTV, including as part of measures to reduce crime, on the Home Office web-site, [www.homeoffice.gov.uk](http://www.homeoffice.gov.uk) (and see for instance, [www.crimereduction.gov.uk/cctv/cctvminisite4.htm](http://www.crimereduction.gov.uk/cctv/cctvminisite4.htm)).

### ***Vehicle Identification***

24. 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***

25. 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, bearing in mind the need to ensure that the benefits of any policies outweigh the costs (in whatever form). 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.

### ***Stretched Limousines***

26. 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 have a legitimate role to play in the private hire trade, meeting a public demand. Consistent with this view licence applications involving use of these limousines should not be automatically rejected (for example just because the vehicles may be left-hand drive). The Department is currently revising its guidance on the licensing arrangements for stretched limousines.



27. Imported stretched limousines are normally checked for compliance with British regulations under the Single Vehicle Approval (SVA) inspection regime, before they are registered. A licensing authority might wish to request sight of the SVA certificate to ensure that the vehicle was tested by VOSA before being registered and licensed (taxed) by DVLA. The SVA test verifies that the converted vehicle is built to certain safety and environmental standards (there are some vehicles that have gained registration without an SVA and these may not comply with British regulations).

28. 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 accepts vehicles with space for more than 8 passengers, particularly where the precise number of passenger seats is hard to determine. In these circumstances, if the vehicle has 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. Authorities should check with local MOT testing stations to find out if the station has the facilities to test such vehicles. If there is difficulty in finding a suitable station, the local enforcement office may be able to advise (contact details on [www.vosa.gov.uk/vosacorp/contactus/vosalocations/vosaenforcementoffices.htm](http://www.vosa.gov.uk/vosacorp/contactus/vosalocations/vosaenforcementoffices.htm) ).

#### **Quantity Restrictions of Taxi Licences outside London**

29. 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'.

30. 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.

31. 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?

32. 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.

33. 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.

34. 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.

35. 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 five-yearly 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***

36. 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.

37. 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).

38. 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**

39. 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. Under this new guidance the police are requested to notify the appropriate local licensing authority of convictions and other relevant information when it comes to their attention that an individual is working as a Taxi or PHV driver. (Further details are contained in Home Office Circular 6/2006. Further information can be obtained from the Criminal Records Section, Safeguarding Vulnerable Persons Team, Police Leadership and Powers Unit, Home Office, Fourth Floor, Peel Building, 2 Marsham Street, London SW1P 4DF; e-mail [Robin.Manson@homeoffice.gsi.gov.uk](mailto:Robin.Manson@homeoffice.gsi.gov.uk))

40. 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**

41. 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 take 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. 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.

#### **Criminal Record Checks**

42. A criminal record check is an important safety measure and is widely required. Taxi and PHV drivers can be subject to an Enhanced Disclosure through the Criminal Records Bureau; this level of disclosure includes details of spent convictions and police cautions. In considering an individual's criminal record, local licensing authorities will want to consider each case on its merits, but they will

doubtless 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.

43. 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. More generally, the Home Office'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).

44. 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.

#### ***Medical Criteria***

45. 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. 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 (i.e. 3500-7500 kgs lorries); the position is summarised at Annex B to the Guidance. It is suggested that best practice is to apply the C1 standards to taxi and PHV drivers with insulin treated diabetes.

#### ***Age Limits***

46. 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.

#### ***Enforcement***

56. 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. 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.

57. 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.

58. 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.

59. 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.

### ***Taxi Zones***

60. 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.

61. 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.

62. It should be noted that the Government intends to make a Regulatory Reform Order which will remove the need for the Secretary of State to approve amalgamation resolutions made by local licensing authorities. It is intended that the RRO should be introduced for Parliamentary scrutiny during 2006.

### ***Flexible Transport Services***

63. 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.

64. 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.

65. 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.

66. 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' (available from [dft@twoten.press.net](mailto:dft@twoten.press.net)). The document itself 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**

67. The Transport Act 2000 requires most local transport authorities in England (not London) to produce and maintain a Local Transport Plan (LTP), having regard to any guidance issued by the Secretary of State. The latest guidance was published in December 2004 asking for a provisional LTP by 29 July 2005 and a final one by 31 March 2006. LTPs set out the authority's local transport strategies and policies, and an implementation programme over a five year period. Authorities report each year on their delivery of policies and programmes in Annual Progress Reports.

68. 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 make to the LTP process. The key policy themes for such services could be availability and accessibility. LTP input could include statements of policy on:

- 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.

69. There should also be a statement of changes in policy since the last LTP and changes that are intended. It would be useful to provide statistics of changes in the number of licences for vehicles, drivers and operators, so that trends in availability can be identified.

### **Annex A: 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)?

**Annex B: 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 either case.

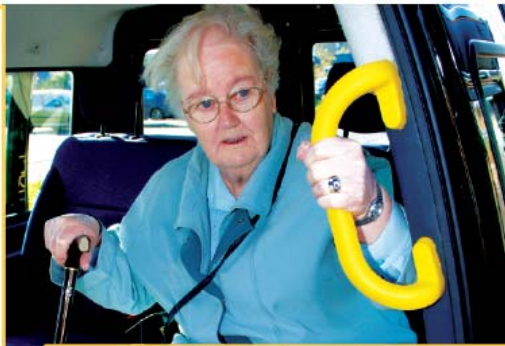
Manoeuvring space measuring to identify that this research is referring to manoeuvring space only and has not

## 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**

**SUMMARY OF DfT CONSULTATION: ACCESSIBLE TAXIS**

## **APPENDIX 3**

### Department of Transport Accessibility Consultation Exercise

The Department for Transport has issued a consultation paper on accessible vehicles, intending to publish guidance to local authorities later in 2009.

This consultation is about improving access by disabled people to Public Hire Vehicles or PHVs. There is evidence that there are not enough licensed taxis available in the locations and at the times needed by disabled people, including wheelchair users and people with an ambulatory disability. Although around half of the current taxi fleet is classed as being wheelchair accessible, these are more often found in major cities. The Government remains committed to improving access to taxis. It has published this consultation package, including an Impact Assessment and two draft technical specifications with the 4 aims of:

- Improving access to taxis so that people with different types of impairment or disability can receive an equal level of service provision and improved access ;
- Agreeing draft technical standards for accessibility in taxis, seeking agreement on whether they should be introduced as guidance or introduced as regulation ;
- Identifying the costs and benefits of potential options through the Impact Assessment ; and
- Exploring issues and options in relation to enforcement, driver training and links with other local transport policies and initiatives.

The types of vehicles being considered, in terms of their characteristics are as follows:

#### **Saloon Car Vehicle**

- saloons, hatchbacks or estates ;
- not wheelchair accessible ;
- meet needs of many users including ambulatory disabled ;
- licensed as Public Hire Vehicles in some areas depending on policy ; and
- PHV fleet almost entirely made up of saloon cars

#### **Wheelchair Accessible Vehicles**

- purpose built i.e. LT1 or Metrocab ;
- can also be converted multi-purpose e.g. Peugeot or Mercedes ;
- some of these would not meet DfT's draft interim standard for wheelchair accessible taxis, e.g. the Fairway and Metrocab vehicles ; and
- mostly licensed as Public Hire Vehicles but increasing use by PH drivers.

#### **Fully Accessible Vehicles**

- a vehicle meeting needs of disabled people including wheelchair users and people with an ambulatory disability ; and
- at present there are no vehicles on the market that would meet all the requirements that are included in the DFT's draft enhanced specification.

### **DfT's Draft Interim Standard**

- draft standard that the DfT proposes putting forward ;
- technical specification would improve accessibility of licensed taxis for some wheelchair users and people with ambulatory disability ;
- majority of vehicles currently available on market would meet standard ; and
- significant minority would not.

### **DfT's Draft Enhanced Standard**

- a draft standard that the DfT proposes putting forward as an aspirational technical specification ;
- technical specification would improve accessibility of licensed taxis for all wheelchair users and people with ambulatory disability ;
- vehicles would need to be designed or redesigned to meet some of the specification ; and
- at present there are no vehicles available which would meet all of the requirements of the proposed specification.

The options being considered are:

- A 'do nothing' option, leaving the market, the trade and local licensing authorities to continue to make local decisions on the make-up of the taxi and private hire fleet and levels of accessibility, without any additional Government guidance or intervention;
- Implementing a pro-active programme of DfT led initiatives that would involve measures such as issuing technical standards as an advisory note, guidance to local licensing authorities, a demonstration scheme, additional enforcement provisions and making best use of other Government policy levers; and
- Regulation: either using the regulation-making powers that are currently in part 5 of the Disability Discrimination Act 1995, or seeking new or amended regulatory-making powers at the next legislative opportunity.

**APPENDIX 4**

**RANK LOCATION FIGURES**

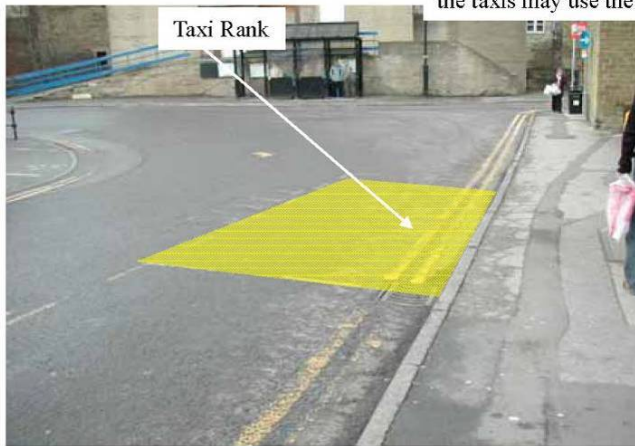




Note that the rank is only 1 space but the taxis may use the disabled space also



Disabled parking space



Taxi Rank

TPI 21681  
January 2005

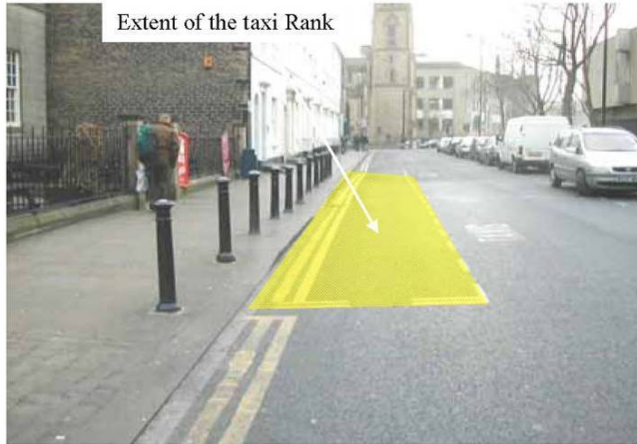
Rank 1 – Towngate, Holmfirth, by the Post Office

Figure 1.1



TPI

Rank 3 – Cross Church St, Huddersfield outside Burger King & Dixons



TPI 21681  
January 2005

Rank 4 – Queen St, Huddersfield outside the Courthouse pub

Figure 1.4

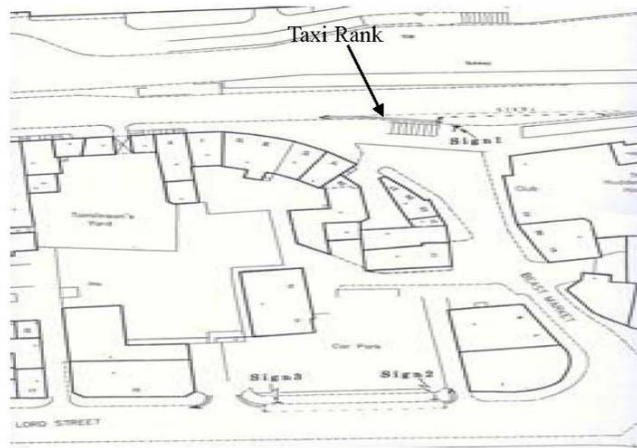




TPI 21681  
January 2005

Rank 5 – Queensgate, Huddersfield, by the Blob Shop

Figure 1.5



TPI 21681  
January 2005

Rank 6 – Southgate, Huddersfield, by Johnnys

Figure 1.6



Survey everything that leaves this doubled parked rank

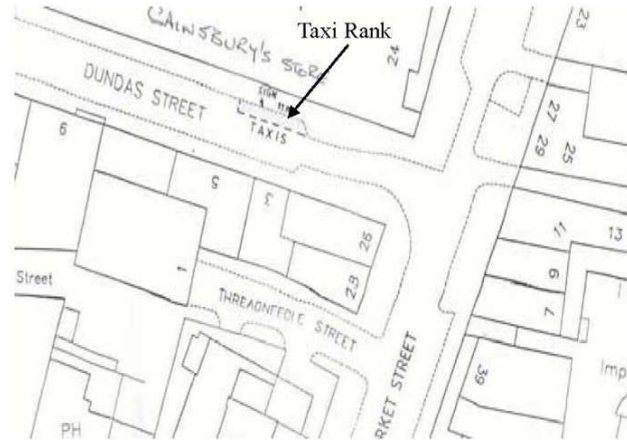


TPI 21681  
January 2005

Rank 7 – Dundas St, Huddersfield outside the bus station

Figure 1.7

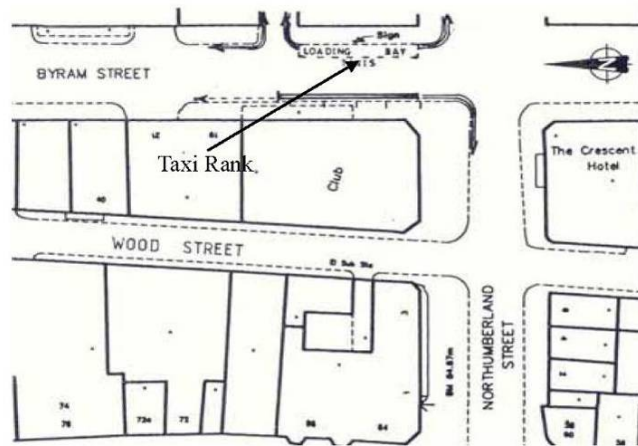




TPI 21681  
January 2005

Rank 8 – Lower Dundas St, Huddersfield next to Sainsburys

Figure 1.8



TPI 21681  
January 2005

Rank 9 – Byram St, Huddersfield, across from the Post Office

Figure 1.9

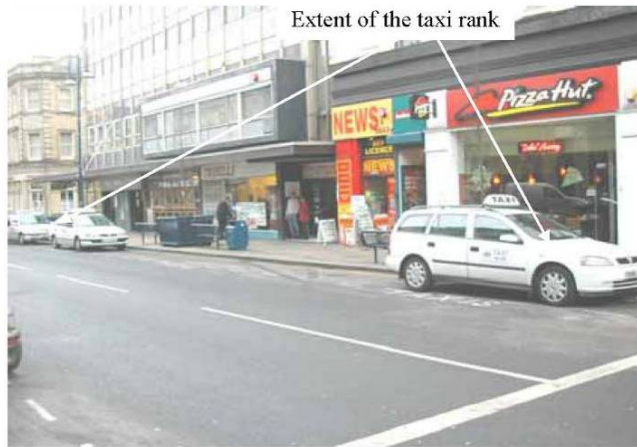




TPI 21681  
January 2005

Rank 10 – Lord St, Huddersfield, outside the Methodist Mission

Figure 1.10



TPI 21681  
January 2005

Rank 11 – John William St, Huddersfield, outside McDonalds

Figure 1.11

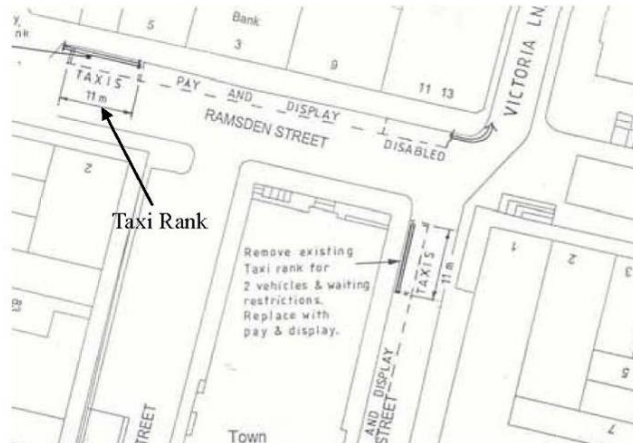


TPI 21681  
January 2005

Rank 12 – Venn St, Huddersfield, at the side Shout and the Corner House

Figure 1.12





TPI 21681  
January 2005

Rank 13 – Ramsden St, Huddersfield across from Max Spielman

Figure 1.13



Just survey the front of this rank



Front of the taxi rank



TPI 21681  
January 2005

Rank 14 – St Georges Square, Huddersfield

Figure 1.14



Survey everything in this area

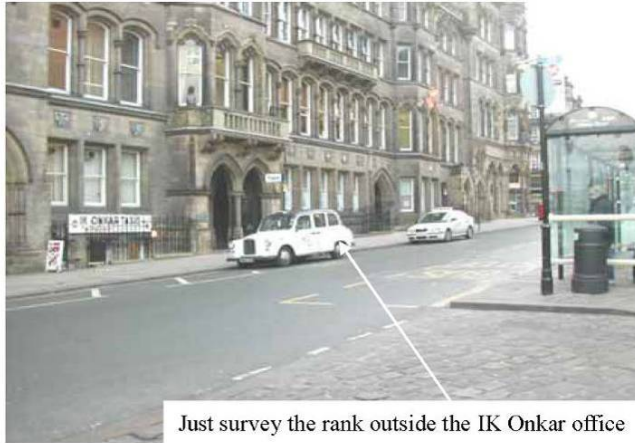


TPI 21681  
January 2005

Rank 16 – Zetland St, Huddersfield, outside the Warehouse

Figure 1.16





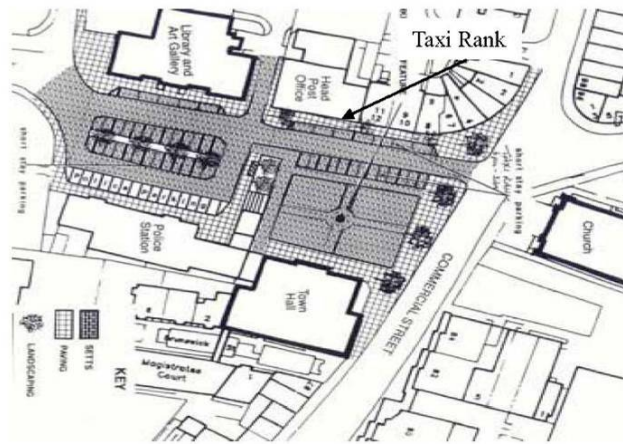
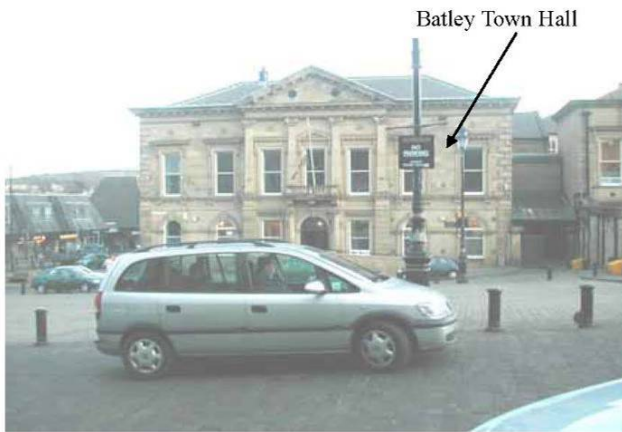
Just survey the rank outside the IK Onkar office



**TPI** 21681  
January 2005

Rank 17 – Railway St, Huddersfield, outside Estate Buildings

Figure 1.17

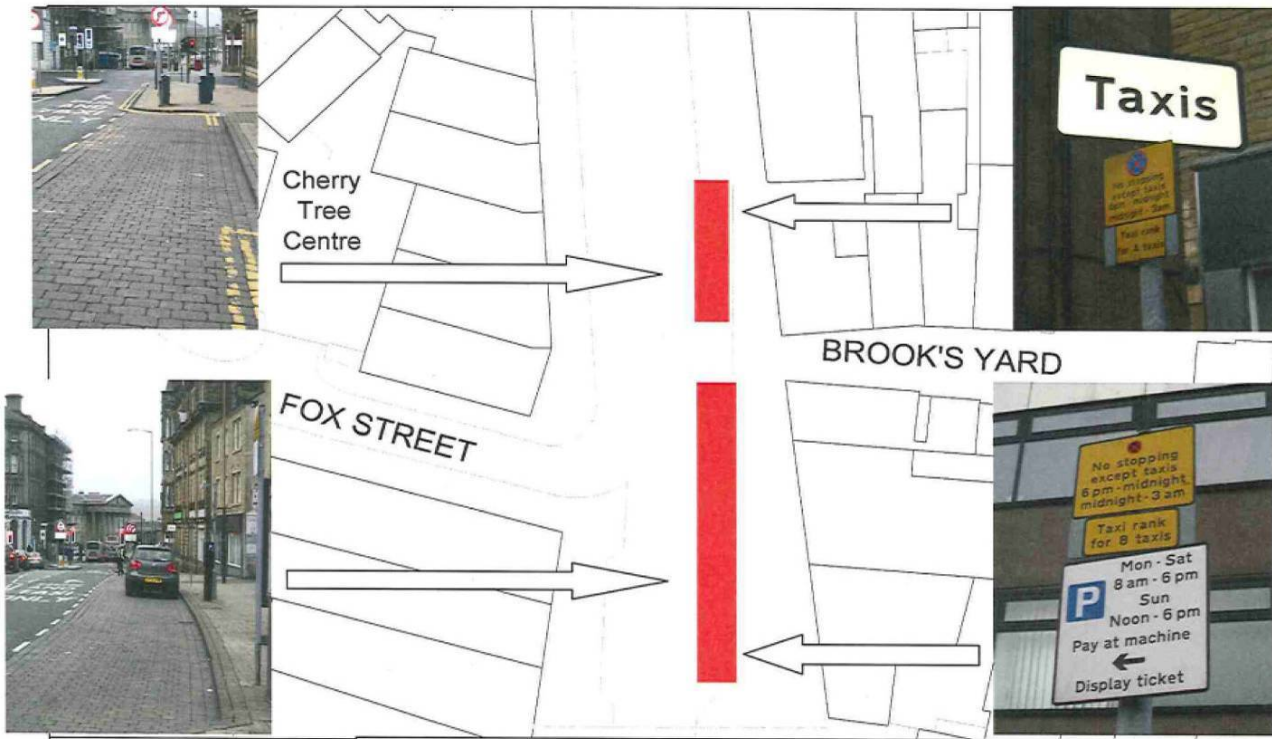


TPI 21681  
January 2005

Rank 20 – Market Sq, Batley, outside the Town Hall & Library

Figure 1.20





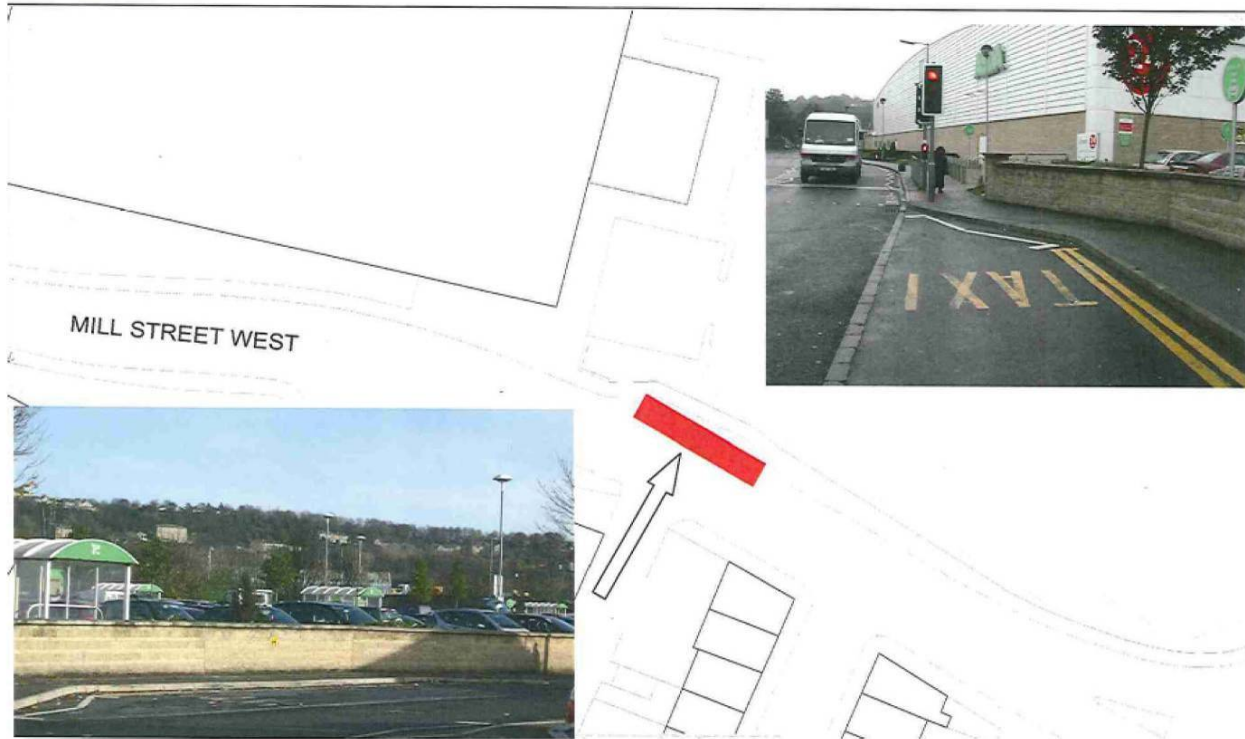
Rank 21: Market St, Huddersfield



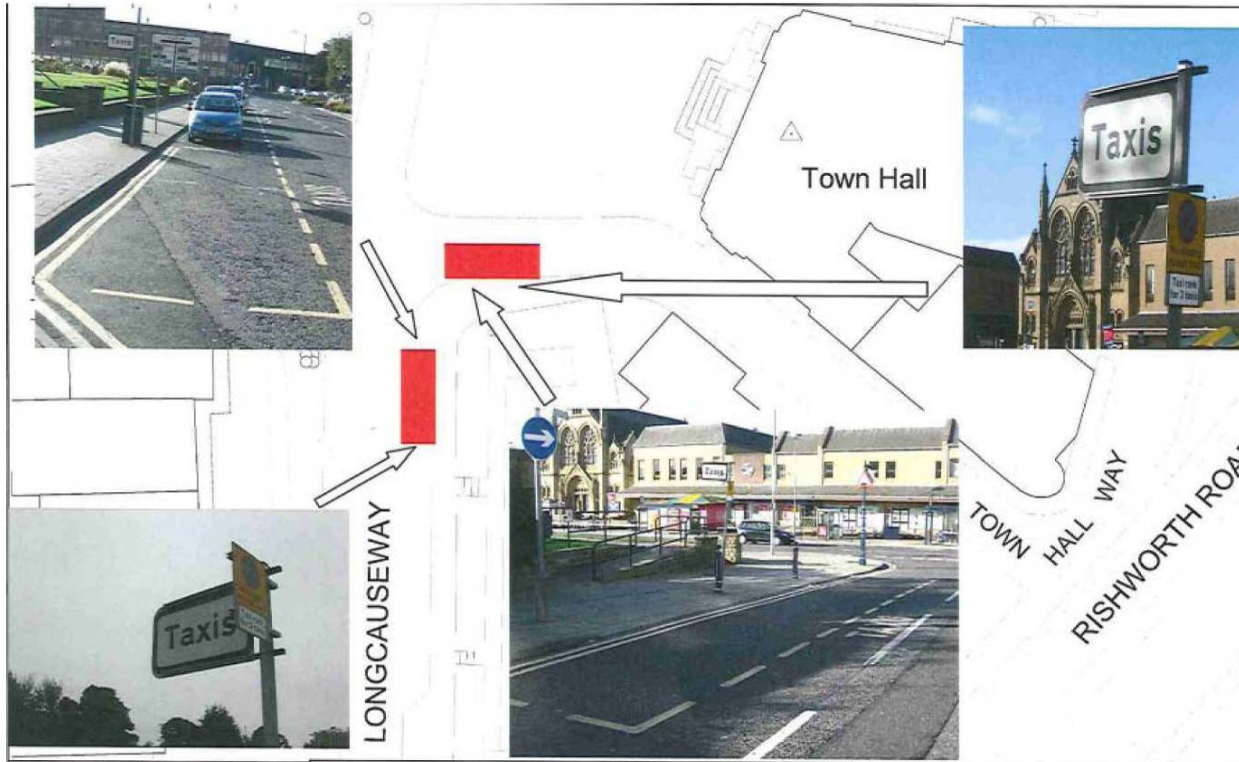
Rank 22: New North Parade (Brian Jackson Centre)



Rank 23: Foundry St, Dewsbury



Rank 24: Asda, Dewsbury



Rank 25: Longcause Way & Town Hall Way  
(Dewsbury Town Hall)





Rank 26: North Gate, Dewsbury

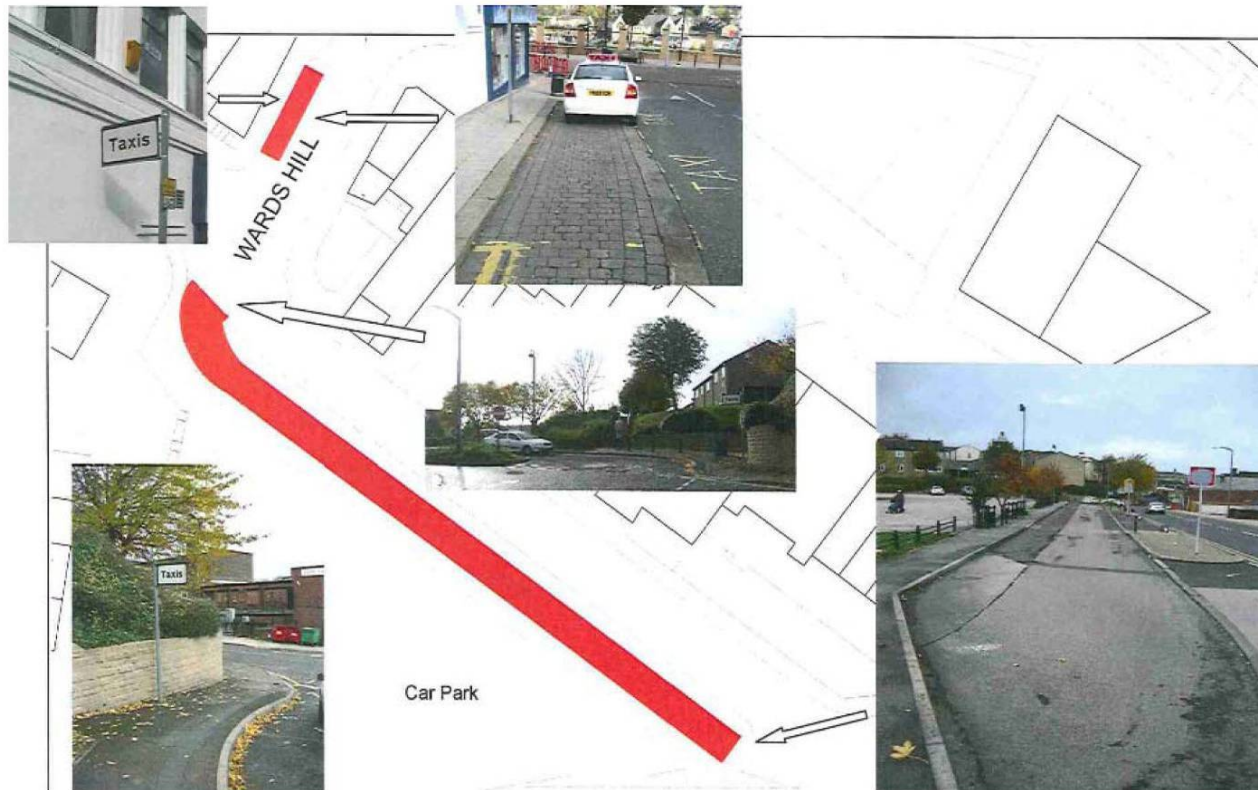


Rank 27: South St, Dewsbury (next to Bus Stations)



Rank 28: Wellington Rd, Dewsbury (by Trains Station)





Rank 29: Ward Hill, Batley (by car park @ Jobcentre)



Rank 30: Henrietta St, Batley (outside Irish Democratic League Club)



Rank 31: Bradford Road, Batley (Lalas)



Rank 32: Bradford Road (Frontier)

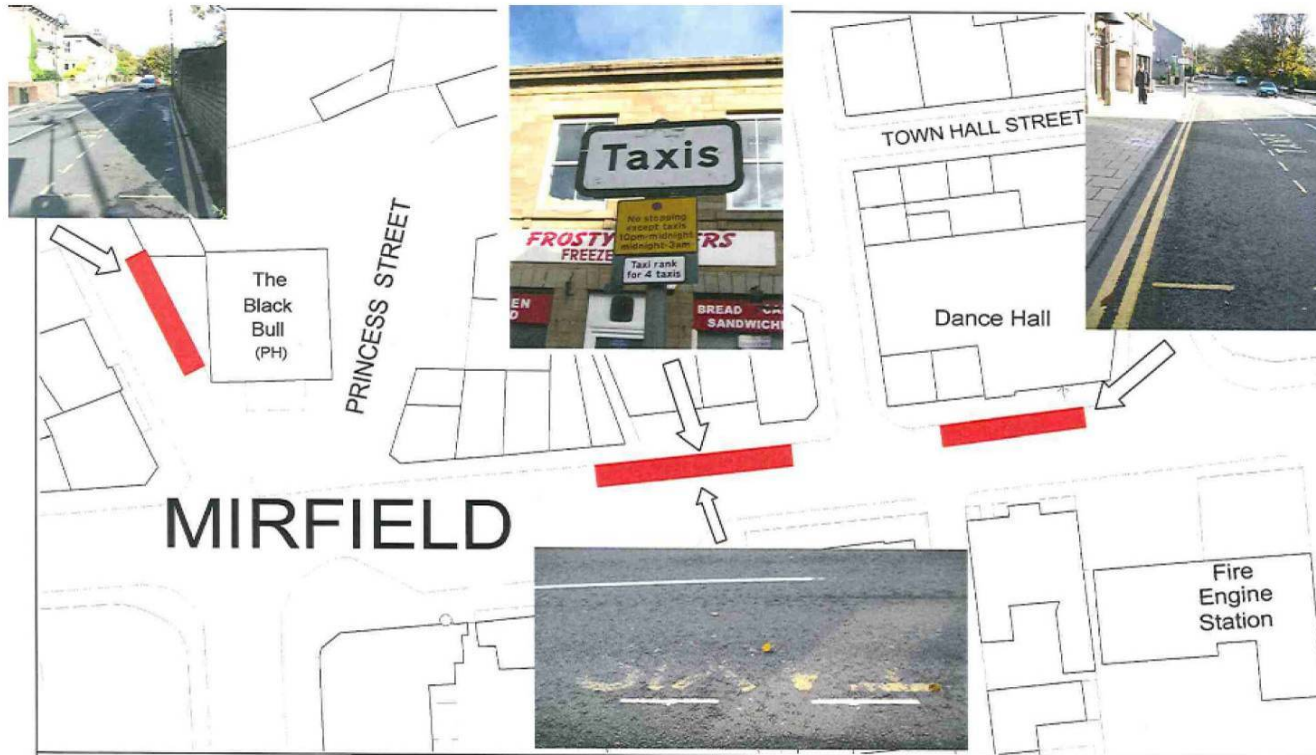




Rank 33: Ludgate Hill, Hecknondwike



Rank 33: Ludgate Hill, Hecknondwike



Rank 34: Mirfield, Queen St (next to The Black Bull & Huddersfield Road)



Rank 35: Greenside, Cleckheaton (next to bus station)

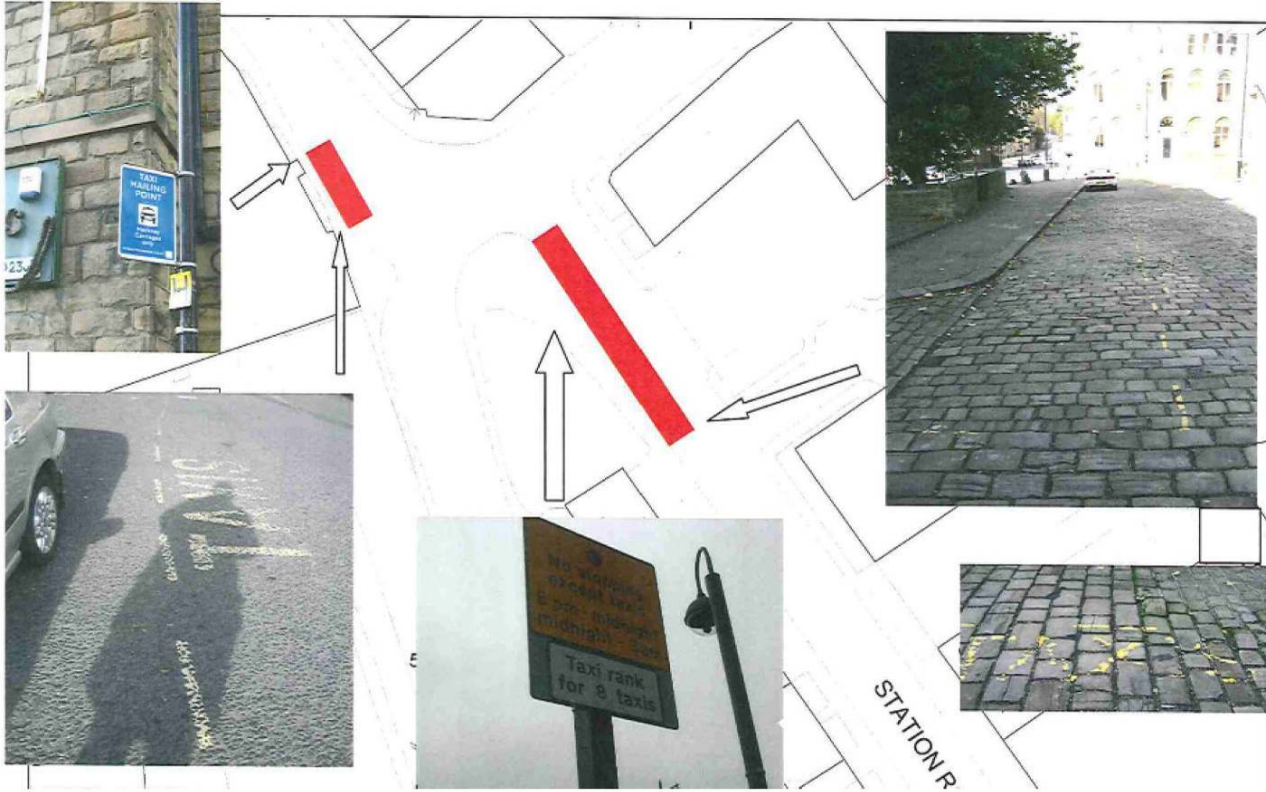




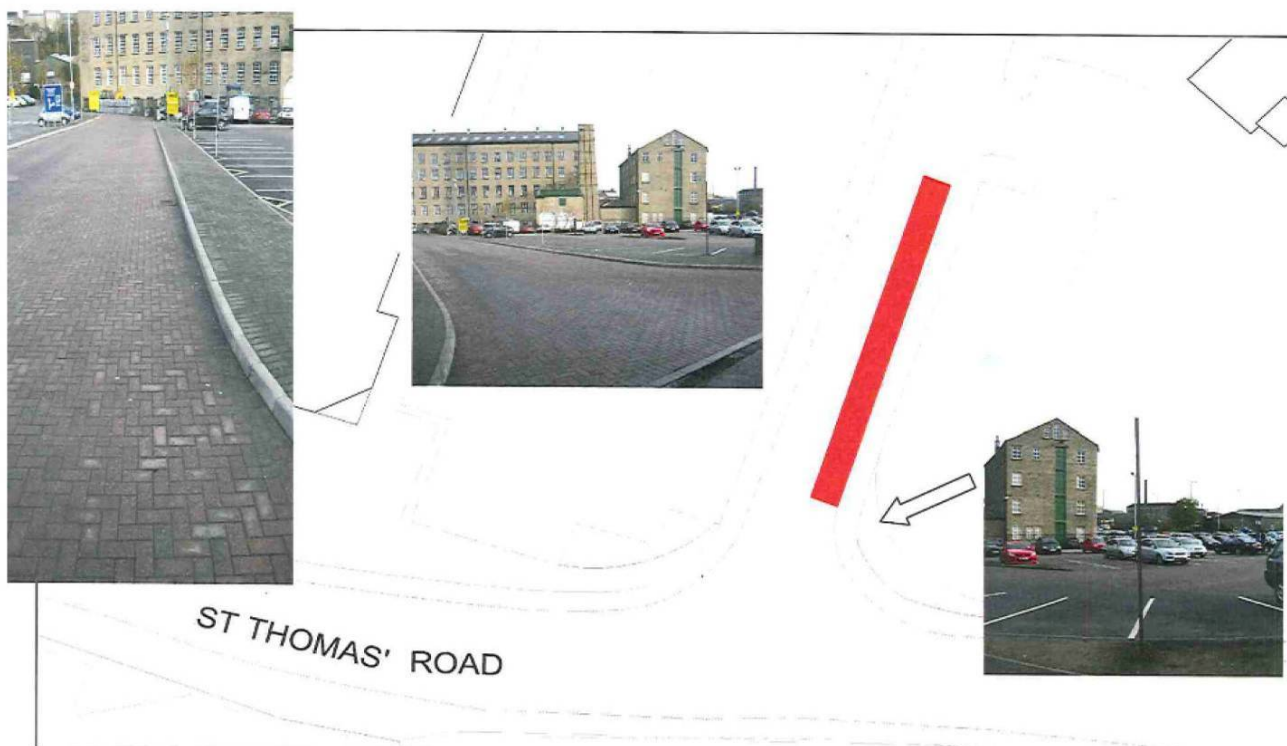
Rank 35: Greenside, Cleckheaton (next to bus station)



Rank 36: Station Road, Batley (outside train stations)



Rank 37: Station Rd, Batley (across from Auction Rooms)



Rank 38: St Tomas Rd (next to casino & bingo hall)





Rank 39: Birstall, Market Place