Kirklees Council

# Hackney Carriage Unmet Demand Survey

August 2020

# Executive Summary

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

The level of observed unmet demand is a long way from the level that is counted as significant in terms of Section 16 of the 1985 Transport Act. The limit on vehicle numbers can therefore be retained, and there is no need to add any further plates.

The overall picture of hackney carriage demand and operations at the start of 2020 was optimistic and positive. There is evidence of increased usage of both licensed vehicles overall and specifically of hackney carriages at some ranks. However, the overall average weekly demand reduction since the last survey of around 11% appears to relate to closure of specific demand generators.

The hackney carriage trade is well-known and appreciated across the complete area, and is active in all main settlements despite there being no zoning policy in place. The hackney carriages trade is especially important to the developing night life of Holmfirth, and there is evidence the trade were working very hard to ensure that demand was met effectively.

The overall hackney carriage vehicle fleet size for this area is always likely to be higher than levels of population might suggest because there are several niche operating areas all of whom seem to have sufficient work keeping their need to move towards 'honeypot' demand to a minimum. The only exception is Holmfirth where various vehicles work together to meet the requirement there which would not otherwise be sustainable.

The present good level of service was provided with the 223 vehicles available at the time of the survey, and the option exists that the limit could be clearly set at that level, which did not result in any unmet demand that was significant.

Fresh surveys of demand would be required no later than March 2023, although consideration should also be given to early understanding of the impacts of the pandemic to ensure continued availability of vehicles to help the recovery of the industry into the 'new normal'.

# Contents

# 1 General introduction and background

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

***The Best Practice Guidance***

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

***Legal Background***

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

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

***Review of Policy and Legislation***

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

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

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

It is also understood that the revisions resulting from the recently closed Government Consultation will eventually lead to a more comprehensive review of the sections of the BPG not affected by the February 2019 Statutory Guide, as stated in para 1.8 of that document – "A consultation on revised BPG, which focusses on recommendations to licensing authorities to assist them in setting appropriate standards (other than those relating to passenger safety) to enable the provision of services the public demand, will be taken forward once the final Statutory Guidance has been issued." The "Statutory Taxi and Private Hire Vehicle Standards" (STPHVS) document suggests the taking forward of the wider BPG review will involve a consultation 'later this year (2020)' with the aim of making "clear recommendations on the measures licensing authorities should consider to enable the trade to react to the demands of passengers". The April 2010 BPG therefore remains valid for our review.

***The present background to policy***

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

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

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

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

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

***Industry standard evaluation of significance of unmet demand***

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

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

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

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

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

***Case law and unmet demand***

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

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

2019 saw three challenges with respect to surveys of unmet demand. All three found in favour of the current methodology being undertaken. A key focus was the need for a robust and up to date independent survey report being available.

In one case it was made clear the current guidance is based on the 2010 BPG, whilst in another case having a valid survey meant those challenging had no case for their proposed challenge, and in the final case an authority was clearly told they could not rely on a very old survey which itself could not be produced.

***Most recent changes relating to demand***

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

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

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

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

***The current status regarding unmet demand studies***

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

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

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

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

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

***Conclusions***

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

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

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

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

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

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

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

***Coronavirus***

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

This study had all work apart from the driver surveys (that were modified and remained running till May) and key stakeholders (which could not reasonably be undertaken now) safely completed.

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

# 2 Local background and context

Key dates for this report title for Kirklees Council are:

- appointed Licensed Vehicle Surveys and Assessment (LVSA) on 9th January 2020
- in accordance with our proposal of November 2020
- as confirmed during the inception meeting for the survey held on 16th January 2020
- this survey was carried out between January and March 2020
- On street pedestrian survey work occurred in mid-March 2020 (on a Wednesday, Thursday and Friday)
- the video rank observations occurred in mid-March 2020
- both the above were before significant impact of the pandemic affected potential responses
- Licensed vehicle driver opinions and operating practices were canvassed using an electronically available and posted out survey during March to May 2020 (but modified to obtain results for pre-lockdown operations)
- Key stakeholders were consulted later in July due to the impacts of the Coronavirus pandemic on their availability but provided no response and it was not felt appropriate to push more than normal for response
- A draft of this Final Report was reviewed by the client during August 2020
- and reported to the appropriate Council committee following acceptance by the client.

The authority has a current population of 443,790 using the 2020 estimates currently available from the 2011 census, 2016 revision. 81% of this are estimated to be aged 15 or over and the target population for on-street interviews.

Kirklees Council is a unitary authority, and in terms of background council policy able to determine its own ranks and transport policy.

The Council currently has a “2025 Kirklees Transport Vision”, an ambitious 20 year transport vision focussed on allowing sustainable transport systems to flourish. The aim is to provide improved wellbeing for its citizens and environment whilst providing the building blocks for a thriving local economy. This vision is to be reviewed regularly against changing travel patterns, technology improvements and funding opportunities. It provides:

A – a top class public transport system for everyone

B – a sustainable transport system that encourages healthy citizens, promotes social inclusion and preserves and enhances the local environment

C – a transport network that promotes a sustainable thriving economy for businesses to invest in.

Item A5 states "fully integrated hub and spoke public transport system, with feeder services linking into core routes for bus, rail and taxi"

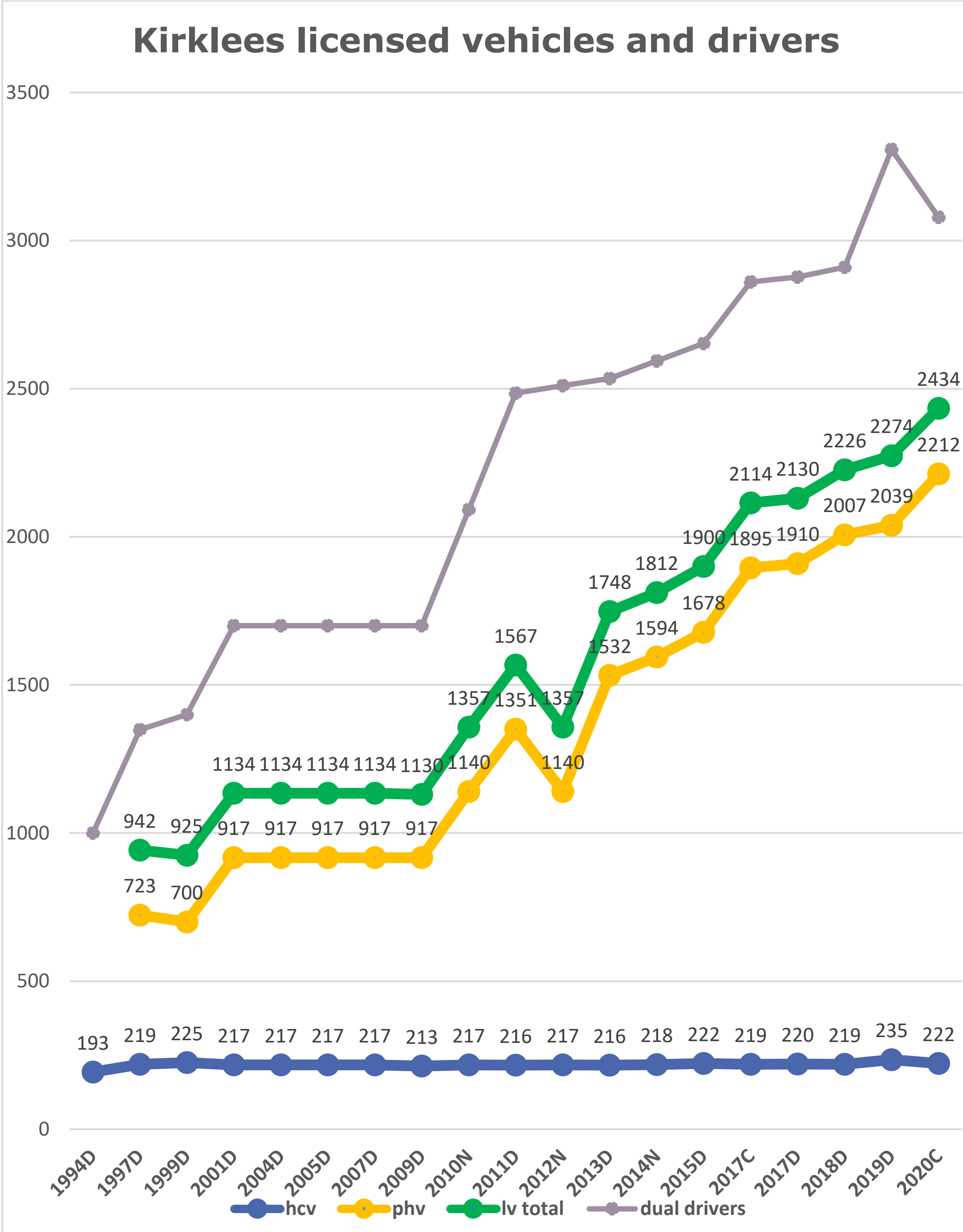
Item A6 encourages a simple through ticketing system for bus, rail and taxi.

The current Local Plan document, Chapter 10, confirms that the West Yorkshire Local Transport Plan 2011-2026 'My Journey' was replaced by a Transport Strategy which is a 20-year vision. This uses the West Yorkshire Draft Transport Strategy Evidence Base of July 2016 which was already available at the time of the last Survey in 2017. LP paragraph 10.68 states "this policy is balanced in favour of sustainable transport modes by ensuring that the requirements of users are met to reduce the need to travel in private cars". Para 10.71 confirms that the Council will work with all agencies that have responsibility for differing types of transport within the district".

The Strategy document identified 1% of travel to work across West Yorkshire was by taxi, a quarter of the level by train and at the same level as bicycle and motorcycle. That document sought improved taxi facilities and environmental performance, noting that "hackney carriages and private hire vehicles are a valuable part of our transport system, providing more choice for whole or part journeys … and a valuable service for those with a disability or mobility impairment". Enhanced taxi ranks, strengthened safeguarding protection and greater take-up of low emission vehicles, together with delivery of mobility as a service to enhance customer experience are encouraged.

***Taxi Statistics***

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



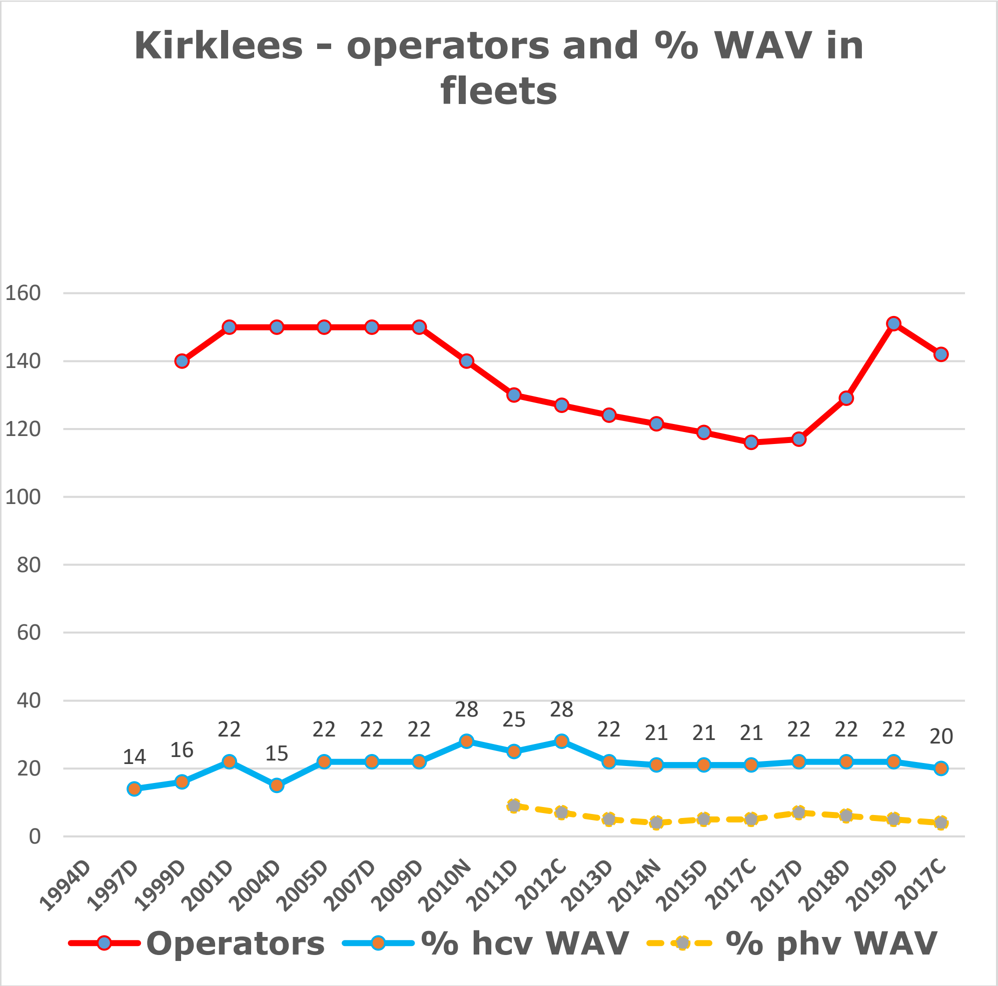

**Licensing Statistics from 1994 to date**

The graph shows the continued strong growth of private hire vehicle numbers. This is in comparison to the limited number of hackney carriage vehicles who have seen their numbers remain similar since around 1997. However, the formal statistics show a growth to 235 in the DfT 2019 statistics which had reduced to 222 in the actual active plates at the time of the demand survey rank observations in mid-March 2020. The actual limit in 2005 was recorded as 224 vehicles in the conclusions of the survey of that date.

These values suggest the share of the fleet that is hackney carriage continues to reduce. In 1999, the highest share for hackney carriages, the level was 24%. It is presently 9%.

The dual driver licence numbers show continued growth since the last survey, although the latest formal council numbers around the time of the rank work suggested some reduction, but still remaining at over 3,000.

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




**Operator numbers and levels of WAV provision in the fleet**

Operator numbers, having shown a decline before the last survey, have grown since that time but like driver numbers, showed a reduction in the most recent information.

The level of wheel chair accessible vehicles (WAV) in both fleets has remained similar for some while. However, there is a trend of reducing numbers, particularly in the latest information, although there has also been a review of information to ensure accuracy, which we understand may have meant some previous over-reporting of the level of such vehicles which implies the apparent reduction in the recent figures may not in fact be an actual reduction, rather a reflection towards accuracy of the numbers presented. There are a small number of WAV in the private hire element of the fleet.

Kirklees Council has chosen to utilize its power to limit hackney carriage vehicle numbers, and as far as we are aware has done so since 1974, according to records within the DfT statistical information. This was the date that Kirklees was set up as a Council within West Yorkshire. It is understood that, unlike some other Yorkshire authorities, there was no adoption of zones retaining any prior structure or limits on hackney carriages from the previous administrations. There were eleven previous districts – County Boroughs of Huddersfield and Dewsbury, municipal boroughs of Batley and Spenborough, and the urban districts of Colne Valley, Denby Dale, Heckmondwike, Holme Valley, Kirkburton, Meltham and Mirfield. There is mention in the 2005 demand survey summary that the vehicle limit was 224 at that time (see below).

Kirklees undertakes regular review of its policy to limit hackney carriage vehicle numbers in line with the BPG. The previous surveys were in 2017, 2013, 2010 and 2005. None resulted in any identification of unmet demand nor any need for additional plates to be added. The statistics, however, suggest some plates were added in 1996 or thereabouts. The summary chapter of the 2005 report suggests the limit was 224 at the time of that survey.

At the time of the last survey we were advised that there had been recent re-issue of a number of plates which had been returned but not re-issued. Whilst this appeared to add about four vehicles, within a short period the actual number on issue had returned to 219. The DfT statistics in 2019 suggested 235 licences but it is not clear if that was an active number of a quote of what was believed to be the limit at that time (but we have found no other evidence than the number of 224).

# 3 Patent demand measurement (rank surveys)

As already recorded in Chapter 2, control of provision of on-street ranks in Kirklees is under the full control of the highway section of the Kirklees Council itself. Appendix 2 provides a list of ranks at the time of this current survey.

Our methodology involves a current review both in advance of submitting our proposal to undertake this survey and at the study inception meeting, together with site visits where considered necessary. This provides a valid and appropriate sample of rank coverage which is important to feed the numeric evaluation of the level of unmet demand, and its significance (see discussion in Chapter 7). The detailed specification of the hours included in the sample is provided in Appendix 3. Detailed results by rank, day and hour are in Appendix 4. We do not believe there have been any changes in rank provision since the last survey apart from the possible addition of the rank in the Bus Station in Holmfirth.

***Overview of rank observations***

A total of 421 hours of rank observation were included in the detailed assessment of demand across the area. This was slightly increased from the 350 of the 2017 survey but did also involve some 'quick watch' observations to ensure actual usage hours of the Bus Station rank in Holmfirth were known compared to the legal hours.

These observations produced 14,155 different observations including vehicle arrivals, passenger arrivals, vehicle and passenger departures and activity of other vehicles that might impact on the rank activity. Of these observations, 10,411 related to vehicle arrivals or departures (remarkably similar to the 10,531 in 2017).

Of all the observed vehicle arrivals and departures, 71% were observed as local hackney carriage movements. The next highest proportion, 14%, were private cars, followed by 10% private hire vehicles, 4% emergency vehicles and 1% goods vehicles. No out of town taxi style vehicles were recorded in the rank observations. The level of hackney carriage observations was reduced from the 78% in 2017 with the increase shared between adding 2% each to private cars and private hire vehicles but a major increase in the level of emergency vehicles observed at ranks from a small number to 4%.

In terms of overall activities recorded, 26% of the total were at the Huddersfield Station rank, 23% at John William Street in Huddersfield, 9% each for Huddersfield Bus Station and Holmfirth Victoria Street and 8% for Huddersfield Cross Church Street. This means the top two ranks accounted for nearly half the overall activity.

When considering only hackney carriage activity in terms of total movements, Huddersfield Station provided 34%, John William Street 23%, Huddersfield Bus Station 11% and Holmfirth Victoria Street 10%. Lower Dundas Street was next with 7% of hackney carriage movements.

The highest level of usage by private cars was at Ramsden Street, Huddersfield, where 58% of vehicle movements were by private car. This rank only operates from 20:00 to 06:00 and is otherwise either loading or disabled badge holders. It is in a layby marked with white dashed lines and the usage is only defined by the single sign located in the middle of the rank. However, the rank is often used during the daytime by hackney carriages although waiting times by vehicles are not long, but never resulted in empty departures suggesting they might be booked vehicles. This suggests, as is common for mixed use ranks, there is some confusion about who can use this rank when both for the licensed vehicle fleet and for the general public.

Foundry Street, Dewsbury also saw a high percentage of cars using it, at 55% of all vehicle observations. This rank saw more hackney carriage usage but also saw a relatively high level of private hire usage as well. This rank is located near the Market and is marked by feint dashed yellow lines, a lamp post plate and a 'Taxis' sign, with the rank surface being bricks compared to the tarmac of the main road. It is a relatively long area and has parking opposite. Hackney carriages serviced the location in all hours from 09:00 with the last vehicle leaving in the 16:00 hour. Two thirds of vehicles left empty. The high level of car usage possibly arises from the fact there is high pressure on kerb space and no full-time presence of hackney carriages. Again, the relatively poor marking status may not help although it is unlikely the abuse caused much serious issue to the rank itself. The private hire usage could relate to legitimate pick-ups that probably have nowhere better to collect their passengers, again given the high pressure on kerb space.

Other rank use by private cars ranged from 38% of movements to 1%, with Huddersfield station rank seeing the least other vehicle usage.

The worst level of private hire pick-ups at a rank related to Holmfirth Bus Station although again this rank is part time, used by both hackney carriage and private hire at most times, and only marked by lamp column signs, albeit being fairly large. Cross Church Street Huddersfield also had issues, but these appeared to be related to the nearby private hire booking office and the issue of high pressure for kerb space nearby. There appeared to be a very high level of emergency vehicles using the Cleckheaton Greenside rank. This is a very long rank and is opposite a health centre which only has limited space for vehicle service along the main road.

***Overall rank usage estimates***

The rank observations were used to produce estimated weekly rank-based demand across the area. These estimates were compared to those from the two previous surveys.

| Rank | 2020 | | 2017 | | 2013 | |
|---|---|---|---|---|---|---|
| | Flow | % | Flow | % | Flow | % |
| Railway Station | 2,928 | 32 | 3,025 | 29 | 2,489 | 27 |
| John William St | 1,783 | 19 | 2,358 | 23 | 1,441 | 14 |
| Victoria St, Holmfirth | 1,312 | 14.1 | 898 | 9 | 402 | 4 |
| Bus Station | 1,041 | 11.2 | 995 | 10 | 636 | 7 |
| Cross Church St | 772 | 8.3 | 652 | 6 | 924 | 10 |
| Lower Dundas St | 549 | 5.9 | 449 | 4 | 636 | 7 |
| South St, Dewsbury | 310 | 3.3 | 255 | 2 | 727 | 8 |
| Market Place, Birstall | 210 | 2.3 | 540 | 5 | 548 | 6 |
| Bus Station, Holmfirth | 137 | 1.5 | n/a | | n/a | |
| Wards Hill, Batley | 95 | 1 | 105 | 1 | 353 | 4 |
| Foundry St, Dewsbury | 50 | 0.5 | 230 | 2 | 120 | 1 |
| Ramsden St | 39 | 0.4 | 66 | 1 | 5 | 0.0 |
| Greenside, Cleckheaton | 30 | 0.3 | 60 | 1 | 121 | 1 |
| Henrietta St, Batley | 10 | 0.1 | 235 | 2 | 143 | 2 |
| Bradford Rd, Bar St, Batley | 5 | 0.1 | 0 | 0 | 55 | 1 |
| Zetland St | 0 | 0 | 0 | 0 | 0 | 0 |
| Queen St | | | 576 | 6 | 180 | 2 |
| St Thomas Road | | | 4 | 0.0 | 0 | 0 |
| Bradford Rd, Frontier, Batley | | | | | 646 | 7 |
| Bradford Rd, La La's, Batley | | | | | 0 | 0 |
| Towngate, Holmfirth | | | | | 0 | 0 |
| Queensgate | | | | | 0 | 0 |
| Southgate | | | | | 0 | 0 |
| Byram St | | | | | 0 | 0 |
| Lord St | | | | | 0 | 0 |
| Venn St | | | | | 0 | 0 |
| Market St outside music shop | | | | | 0 | 0 |
| Market Sq, Batley | | | | | 0 | 0 |
| New North Parade | | | | | 0 | 0 |
| Mill St E, Asda, Dewsbury | | | | | 0 | 0 |
| Longcause Way and Town Hall Way, Dewsbury | | | | | 0 | 0 |
| North Gate, Dewsbury | | | | | 0 | 0 |
| Wellington St, Dewsbury | | | | | 0 | 0 |
| Ludgate Hill, Heckmondwike | | | | | 0 | 0 |
| Station Rd, Batley | | | | | 0 | 0 |
| Station Rd, Batley across from auction rooms | | | | | 0 | 0 |
| New St, Huddersfield | | | | | | |
| ***Total*** | ***9,271*** | | ***10,447*** | | ***9,426*** | |
| ***Growth since previous*** | ***-11%*** | | ***+13%*** | | | |
| ***Growth since 2013*** | ***-2%*** | | | | | |

The table shows that the top two ranks in the area remain that at the Station and in John William Street, both in Huddersfield. Compared to 2017, they retain the total of just over half of all rank-based demand estimated. However, both have lost patronage although the Railway Station has lost less and therefore become more dominant, with nearly a third of all demand compared to the nearly a fifth for John William Street. These two remained the top two ranks in 2013 but only had 41% of demand.

Use of the night rank at Victoria Street in Holmfirth continues to grow. This rank is now third busiest in passenger terms and has grown in both numbers and share since both 2013 and 2017. It now has just over 14% of total passenger demand, particularly high considering the relatively limited hours of operation. This is supplemented by a further 1.5% of total demand at the Bus Station rank there (a site not previously included).

The Bus Station rank in Huddersfield has also continued to grow in usage, with the current level just over 11% of the total. Cross Church St rank has also seen growth.

The above top five ranks are the only ones with over 8.3% of passenger demand at this time. This is a similar pattern to 2017, although the top four now take 76% of all passengers compared to 71% in 2017, suggesting a focus of rank-based demand increasing at these sites.

The next two ranks in patronage level terms have all gained both passenger numbers and in share. All saw reductions from 2013 to 2017 but have now regained some of the lost passengers, but have not returned to the 2013 levels.

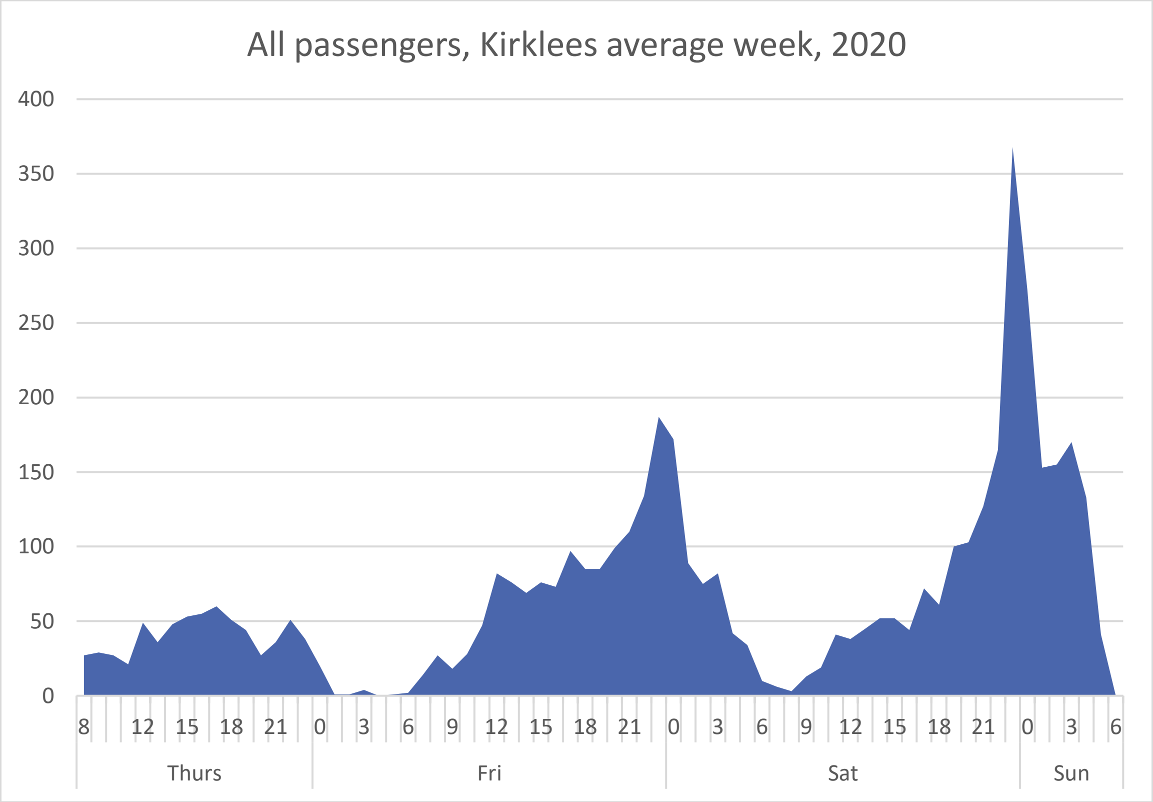
Market Place, Birstall continues to lose passengers and now has just 2.3% of demand compared to 6% in 2013. All the remaining ranks have seen quite significant reductions apart from Bar Street in Batley which saw no passengers in 2017 but a few in 2020, although this is only 0.1% of the total.

Two other ranks used in 2017 no longer see any real usage, St Thomas Road and Queen Street, the latter seeing closure of its related club and no replacement making the location redundant. Loss of clubs continues to be the main reason that rank sites cease usage. Many of those closing had long histories and long relationships to the vehicles servicing the ranks there.

Compared to 2017 (surveys at almost exactly the same weekend in March), overall passenger levels have reduced by 11% and are also 2% lower than that observed in 2013 (when surveys were in July). The increase experienced from 2013 to 2017 seems to have been reversed, although as noted above the picture is not all downwards, with some significant increases. The changes observed generally accord with expectations, with a major loss resulting from one club closure. The minor reduction at Huddersfield station might have been the beginnings of the impact of the pandemic (with rail tending to be hit first as people were encouraged to work from home when they could).

The remainder of ranks shown above have long been known to be unused, mainly arising from closure of a network of night venues many years ago. They have been included in the table for historic comparison and record. They were excluded from observation in 2017 with agreement of the Council.

The graph below shows the total flows at all ranks for all observed hours. Some ranks were not covered on all days but the overall picture shows the general trends at the ranks:

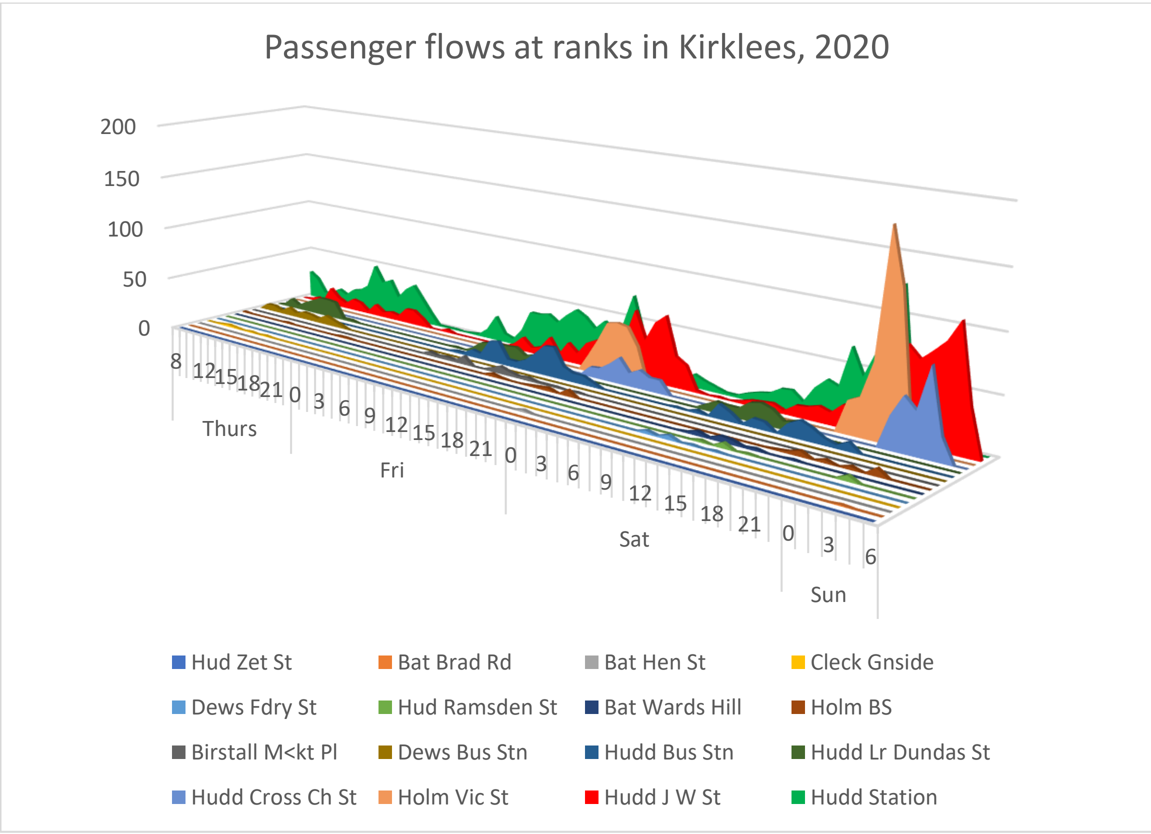


As is typical in most places, demand in total rises from Thursday to Friday to Saturday. There is very little hackney carriage rank demand through the early morning of Friday. Flows on Fridays tend to be higher than Thursday, with a peak at late night, and flows right through to Saturday. On the Saturday, flows rise more gently than on the Friday, but then rise very steeply to a peak, after which they subside more slowly and continue right through to the early hours of Sunday.

The peak flow was nearly six times the average hourly passenger flow of some 67 passengers. This was a very strong rise for the 23:00 hour on the Saturday even from the previous hour. Flows then reduced through to the 05:00 hour on the Sunday morning. The Friday night peak hour, at the same time as that on Saturday, 23:00 was half the level of the peak flows. Further, the peak flows of 110 or more were for four hours over the Friday / Saturday but 100 or more from 19:00 on the Saturday through to 04:00 on the Sunday. This suggests the area has very peaky demand (see later).

***Rank usage by location and time***

The further graph below considers the spread of demand over all ranks.



This graph shows that the Station rank at Huddersfield provides demand for the bulk of the working day with some overnight demand. John William Street rank also provides good levels of demand at most times and provides significant demand for relatively long periods in the early hours of Saturday and Sunday. Huddersfield Bus Station tends to provide good levels of daytime demand but reduced on Saturdays. The main Holmfirth rank provides very significant levels of passenger numbers on both Friday and Saturdays, with the Saturday through to Sunday being much higher and being the busiest rank on the Saturday in the area. Cross Church Street also provides significant late evening / early morning flows.

Other ranks across the area add to the mix of patronage albeit at very low levels.

***Surveyed hours with observed unmet demand***

The rank data was sorted to identify the hours with any passenger delay, listing this from the highest average passenger delay in an hour to the smallest. Just 2% of all observed hours saw an average passenger delay in that hour of a minute or more. A further 4% had average passenger delays that were under a minute.

The longest passenger delay observed was 12 minutes. There were only four passengers who experienced delays of 11 or 12 minutes. Just 13, or 0.3% of the total of all passengers, had delays of six to ten minutes. 2% had delays between one and five minutes. Over all passengers, the study average passenger delay was just five seconds, very small.

Of the eight hours when average passenger delay was a minute or more, five were at the Holmfirth ranks, with four of these at the bus station. However, most of these were in hours that were not at the peak and when flows were generally low. They may therefore be booked hackney carriage trips rather than people waiting for a vehicle on spec. There was, however, one hour at the main Victoria Street rank there that did see true unmet demand, but as the demand was reducing in the 02:00 hour on the Sunday morning.

Three other hours with over a minute of average passenger delay were at Huddersfield Bus Station and Lower Dundas Street ranks at 12:00 and 13:00 on the Friday. One of these, at Lower Dundas Street, saw the longest passenger wait of 12 minutes in the survey.

The other lesser average passenger delay hours were spread across many different ranks and times. However, the two peak hours at Holmfirth Victoria Street did see people having to wait, albeit never more than five minutes. This affected 30 people in the peak hour and 27 in the hour previous, but amazingly the resulting average passenger delay over all passengers was just 20 seconds for the busiest hour and 23 seconds for the second busiest hour. This shows excellent levels of service to this demand.

***Frequency of vehicle operation during rank survey***

A survey was undertaken considering the hackney carriage vehicles observed at or near ranks covering a sample of 20 hours on the expected busiest day of the survey (Saturday 14th March, 2020). The hours were split between Huddersfield, Cleckheaton, Birstall, Batley, Dewsbury and Holmfirth, all covering locations near to ranks at time it was understood those locations would see hackney carriage vehicles. All taxi-like vehicles were recorded and checked against the current valid vehicles at the time of the survey.

581 different vehicle movements were observed across the 20 sample hours of survey. 81% of the movements observed were identified to be valid local hackney carriages. 13% were identified as valid local private hire, with the remainder being plate references that did not match current vehicles in the local fleet. These vehicles were possibly misread or mistyped but were definitely identified as local vehicles rather than out of town. Just one vehicle was observed as an out of town vehicle.

When checked to the total current number of vehicles, the private hire vehicles observed amounted to just 3% of the very large local fleet. Most were seen just once, with a few seen twice. For the hackney carriage observations, 58% of the current fleet was observed, a much higher proportion than for other vehicle types but expected given the focus of the observations was at the busiest ranks at their busiest times. This is slightly reduced from the 62% of 2017.

Our sample was also designed to capture vehicles across the area, not just in Huddersfield. The average number of times each vehicle was seen was four, with the most frequent vehicle seen ten times across the sample hours.

With respect to the different periods / locations vehicles were observed, one vehicle was seen in five different periods / locations – various locations in Huddersfield plus the later observation in Holmfirth. 35% of all hackney carriage plates observed were seen in both one and two sets, 20% in three and 10% in four.

The location where least vehicles were seen was Cleckheaton. However, of the four vehicles observed, only one was only seen exclusively there. The other three had different spreads over the area, with one seen there and at both Holmfirth observations, one seen there, at the later Holmfirth and at Dundas Street, Huddersfield and the final vehicle seen there and in the late sample at Huddersfield Station.

Whilst Birstall saw the same number of vehicles as Cleckheaton (four), they were seen more often (eight times in total). However, of these, only one was seen elsewhere (in Batley). Batley saw one more vehicle but, apart from the vehicle shared with Birstall, none were seen elsewhere. This suggests the Birstall and Batley fleets are much more insular than for the other locations.

Dewsbury saw eleven different vehicles. Of these, eight were only seen there. Two were seen in Dewsbury and at Huddersfield station, with the final vehicle seen at Dewsbury and the later observations at Holmfirth. This fleet is also relatively insular, but not as strongly so as for Birstall and Batley.

This suggests more individual small fleets servicing four of the smaller locations more exclusively. This characteristic of supply implies a larger fleet would be required across the whole area than if vehicles were focussed on one location, as many seem to be getting enough custom locally and would not therefore be generally available to supplement local fleets under pressure.

However, the picture for Holmfirth was much different. Firstly, the fleet observed here was much larger, some 38 different vehicles (of which 27 were seen in both periods observed), but secondly, 24 were also seen in other locations, mainly in Huddersfield ranks. This is consistent with there being little demand other than at night, which means vehicles generally need other work.

With respect to total hackney carriage observations, 24% of all the observations were during the late night period at Huddersfield Station (remarkably similar to the 25% in 2017). The next highest proportion, 18% were the later observation at Holmfirth (increased from 16% in 2017). Next was John William Street, Huddersfield with 16%, then Holmfirth early evening with 13%. Lower proportions were seen in earlier periods whilst the smaller locations saw much smaller proportions, with 4% observed in Dewsbury, 2% in Birstall and 1% each in Cleckheaton and Batley.

The overall view in terms of vehicle activity is quite varied. Whilst there are small fleets focussed on the smaller locations, many vehicles do cover beyond Huddersfield whilst there is also clearly a high level of focus on night demand even within Huddersfield. As is typical with hackney carriage fleets, it demonstrates reaction to demand. It also demonstrates the area has hackney carriage demand not just focussed in the main central area of Huddersfield – more remarkable given there is no zoning system meaning vehicles could choose to all work in the 'honey pot' but are clearly not doing so. Yet some also choose to remain in their own local area.

This provides confidence that the current policies seem to be providing a district wide service provided by careful sensitivity of the fleet to passenger demand.

***Observed usage for those with disabilities***

From the detailed rank observations, 30% of the observed hackney carriage vehicles appeared to be wheel chair accessible style vehicles (increased from the 25% of 2017). When considered by total vehicle movements by hackney carriage, 69% were WAV style at John William Street, 63% at Cross Church Street, 52% at the Bus Station, 50% at Lower Dundas Street and 38% at Huddersfield station. There were very few WAV apparently active in the smaller centres, apart from at Holmfirth Bus Station which saw a third of the hackney carriages apparently WAV style.

There were seven people observed accessing ranks in wheel chairs during this survey. The largest number, three, were at Huddersfield station rank, followed by two at Lower Dundas Street, one at Ramsden Street and one at Foundry Street in Dewsbury. This is higher than the total of two users observed in 2017.

There were 58 people observed to have some other form of disability, not a wheel chair. 23 of these were at Lower Dundas Street, 16 at Huddersfield Bus Station, 7 at Huddersfield rail station, 6 at John William Street, three at Ramsden St and one each at Holmfirth Victoria Street, Cross Church Street and Wards Hill, Batley. This is also very much higher than the level of six in 2017.

# 4 General public views

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

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

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

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

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

More details of the results of the on-street responses are included in Appendix 5.

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

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

For this survey, 200 people were interviewed in the streets of Huddersfield, Dewsbury and Holmfirth, with the focus in the latter place later in the afternoon / early evening. The interviews were undertaken on a Wednesday (Birstall, Dewsbury and Batley)(corporately referred to as Dewsbury below), Thursday (Huddersfield) and Friday (Holmfirth, between 20:00 and 22:40) in mid-March 2020 (before any significant influence of the COVID-19 pandemic).

The general nature of those interviewed was checked against the 2020 estimates based on the 2011 census, 2016 update. For the full area, males were underrepresented by 12%, the lower and upper age groups were also underrepresented by 4% and 3% respectively whilst the middle group of age was over-estimated by 7%.

By area, Holmfirth had the best match to the gender profile with Dewsbury with the largest deficit of males; in age terms all locations followed the same difference profile although the Dewsbury sample almost matched the census whilst the Holmfirth sample was most biased to the middle group for age. None of these variations are expected to affect the overall results but are worth bearing in mind in interpretation.

Huddersfield and Dewsbury interviewees were 90-92% local whilst this level dropped to 64% for Holmfirth, as might be expected (even though this was March). For the Dewsbury area, those not from Kirklees were from Leeds, Wakefield and Bradford area postcodes. For Huddersfield they covered Leeds and Wakefield whilst for Holmfirth they were Sheffield and Wakefield.

51% in Dewsbury, 56% in Huddersfield and 84% in Holmfirth had access to a car suggesting more potential for use of licensed vehicles in Huddersfield and Dewsbury compared to Holmfirth. Again, these values are as might be expected.

All those interviewed told us their use of licensed vehicles in this area in the last three months. Across the area, 71% had used a local licensed vehicle in the last three months. This is slightly higher than the 68% in 2017. As might be expected, recent use in Dewsbury at 68% and Huddersfield at 78% is higher than that for Holmfirth at 48%.

Taking actual usage and transforming this to average monthly usage suggests 2.5 licensed vehicle trips per person per month for Dewsbury, 2.7 for Huddersfield, 0.8 for Holmfirth and an average of 2.4 across the full sample – marginally higher than the 2.3 found in 2017.

The profile of usage in each area was different. 32% of Dewsbury respondents said they used licensed vehicles one or twice weekly. But 21% of this sample said they never used them. For Huddersfield only 7% said they never used them with the peak of 28% saying once or twice monthly. For Holmfirth, the highest proportion, 40% said they never used licensed vehicles with the next highest being 24% for once or twice monthly.

People then told us how they normally obtained licensed vehicles. 93% of Huddersfield respondents gave at least one reason, with 79% of Dewsbury and 64% of Holmfirth interviewees responding. Most provided multiple responses. 1% said they used all five quoted methods, 4% gave four, 7% three, 30% two and the remaining 58% just named one single main method.

On average, half of those responses were that people got licensed vehicles by phoning. 22% said ranks, 4% hailing, 10% freephone and 13% an app. The hailing and rank values have increased from the 15% and zero respectively in 2017 whilst freephone has also gone up from 3% with the direct answer phone reducing, mainly by the impact of apps, but also from the increased level of freephone usage.

For the Dewsbury interviewees, 58% of methods used were telephone, 20% freephone and 16% an app – with none using ranks and 6% hailing. In Holmfirth, 61% phoned, 35% used ranks and 4% used an app (the first two being the highest proportions in any area). Huddersfield provided a more typical response with 44% telephone, 31% using ranks, 13% an app, 7% a freephone and 4% hailing.

These are all completely different profiles within the one licensing area. Apps have been more predominant in more urban areas as might be expected given their need for a vehicle presence in an area.

When people were asked the level of use of hackney carriages, 59% in Dewsbury and 58% in Holmfirth could not remember when they had last used a hackney carriage. This was lower in Huddersfield at 38%. The overall level averaged over the area was 48%. This is much reduced from the 61% average overall of 2017 suggesting hackney carriages have become more obvious to people more recently. There is no clear reason for this.

17% in Dewsbury could not remember seeing a hackney carriage in the area, but this value was zero for both Huddersfield and Holmfirth. The resulting usage per month was relatively low – 0.2 trips per person per month for both Dewsbury and Holmfirth but a larger (but still quite low) value of 1.1 for Huddersfield, and 0.6 overall, higher than the value of 0.3 overall from 2017.

When compared to total licensed vehicle trips, Dewsbury hackney carriage trips were about 7% of the total, Holmfirth 23% and Huddersfield 39%. For both Dewsbury and Huddersfield these proportions are similar to the 6% and 35% respectively from the "methods used" question. For Holmfirth the quoted value of 39% is much higher than the stated usage from frequencies at 23%. This matches the very low frequencies quoted for usage there, with the most often usage quoted being once or twice monthly.

People told us the companies they phoned for licensed vehicles. Very few companies saw quotes other than in one single location. 40 different companies were named in total (even more than the 34 of 2017). Seven of these were mentioned in Holmfirth (two of which were also named in other areas). 17 were mentioned only in Huddersfield with four others also named elsewhere. 13 were only mentioned in Dewsbury with a further three named elsewhere as well.

The largest overall company took 40% of the Huddersfield mentions. The next largest saw slightly fewer mentions but was 67% of the Dewsbury mentions. These were the only two companies with over 50 mentions each. All other companies were mentioned 18 or less times, with just four companies having 10 or more mentions. Many companies only got a single mention. This suggests high competition yet also with one dominant company in each of the three questionnaire sub-areas.

The two largest companies also used apps. The national app was only mentioned in Huddersfield, as might be expected. One other app was mentioned once in each of the other areas providing three additional but small apps mentioned across the area – providing six different app names for this survey.

People were asked about use of ranks. Again, most mentions were specific to each of the three different areas. The only location actually mentioned in all three areas was Holmfirth. However, in Holmfirth's respondents knowledge of ranks was restricted to the two ranks in Holmfirth only.

For the full sample, 57% of interviewees named at least one rank. 30% named three, 27% two and 43% just one. This suggests good knowledge of ranks overall.

Across the area, the station or various mentions of it obtained 27% of all mentions, followed by John William Street with 16% and Sainsbury's (not a rank) 12%. In 2017 the station and John William Street both obtained 14%, but there was a vote of 12% for 'bus and train station' which if added to the station value bring it close to the current value.

As might be expected, the largest quoted ranks were in Huddersfield. The station rank obtained 38% of all Huddersfield mentions. John William Street gained 23%, the Bus Station 9% with 17% saying they used a rank at Sainsbury's. Three other ranks saw minor mention plus a general 'town centre'. 5% of mentions from those interviewed in Huddersfield were of Holmfirth.

For Holmfirth, Victoria Street gained 53% of mentions and the Bus Station 47%. The largest mentions in Dewsbury only totalled six – accounting for 21% of all mentions there. A general 'Batley' and the Wards Hill rank in Batley both obtained 14%. 11 other locations were mentioned, many of which were general (and one of which was in a town outside Kirklees).

For Huddersfield, 48% of those naming locations said they used them. In Holmfirth this proportion fell to 32%, with that in Dewsbury being even lower at just 18% (but consistent with other questions).

A very small number of interviewees told us why they did not use ranks. Dewsbury respondents gave the most responses, 55% of which were that people did not use ranks at all, 41% said they were too expensive (presumably meaning use of hackney carriages) and the remaining person (4% of the response) said they normally phoned a company. Five responses were given for Huddersfield, the largest overall concern being insecurity at the Bus Station rank. There were no responses from Holmfirth interviewees.

Interviewees were asked about various aspects of their last licensed vehicle trip. Just under half those interviewed in Dewsbury provided a response, 69% of those in Huddersfield and 32% in Holmfirth. Views in the three areas were completely different.

The Dewsbury interviewees tended to have the least favourable response, with most top proportion scores being for 'average', with all factors scoring some 'very poor' responses. The only factor that had the top proportion as 'very good' was driver hygiene. Driver appearance had the top proportion for 'good', as did price, though the 'very poor' level for price was 27%, the highest score in that category. This suggests in general vehicles and drivers in the Dewsbury area tend to be more average. This was the only issue quoted for the same area in 2017, suggesting some issue with the drivers of Dewsbury, although not significant, but still worthy of note with respect to being aware of peoples' views.

In Holmfirth, there were only two areas that had any 'very poor' score, and that was minimal – being vehicle cleanliness and repair. All but price had the highest proportion saying 'good'. The most positive scores for 'very good' were 25% each for driver appearance and driver knowledge. Although price had the top score of 63% as 'average', for this area there were no 'very poor' scores for price, suggesting people here were less worried about price than elsewhere, and much more satisfied with overall service levels.

For Huddersfield, as for Holmfirth, the highest scores were 'good' with only price scoring highest for 'average' (59%). Driver knowledge again scored best in terms of levels of the 'very good' scores. The typical score for Huddersfield suggests the fleet there is generally 'good' in peoples' views.

A small number of interviewees provided further comment for areas they had scored poor or very poor. For Holmfirth there seemed to be a concern about expense of journeys but also problems with driver standards, despite the otherwise generally higher views of the fleet there. The few poor or very poor score comments for Holmfirth (all four of them) related to price, again despite the general good scores otherwise. For Huddersfield, the major concern seemed to be price, but mainly related to passengers feeling that drivers were taking them longer routes to generate higher fares.

When asked what might encourage people to use hackney carriages or to use them more often, the strongest response came from the Dewsbury set of interviews. 47% gave views. For Huddersfield, 22% provided comment and for Holmfirth 20% did. In Holmfirth, the three matters that might increase usage were better drivers (50%), price (40%) and better hygiene (10%).

The other two areas had generally similar responses although the price response was strongest for Dewsbury. Price was the highest response in both areas, with the remainder split between better vehicles, more hackney carriages available by phone, more available at ranks and better drivers. Huddersfield had a higher level of people wishing to see more hackney carriages available by phone than Dewsbury.

Most felt safe using hackney carriages in the daytime, rising from 94% in Dewsbury to 99% in Huddersfield and everyone in Holmfirth felt safe in the daytime. For nights, the values were quite a bit lower, 81%, 86% and 94% perhaps suggesting some issue with night safety concerns. A lot of these seemed to relate to an often-quoted (by those responding) incident in 2019 (more information available on request from the licensing officer). Few suggested actions but amongst them was need for lighting around the Bus Station rank and a feeling that perhaps people might be better to use booked private hire vehicles.

The dominant area response (63%) was that fares were cheap or at least fair, with few saying they were expensive. The lowest score for 'cheap' was in Holmfirth with the highest, 74% in Dewsbury.

66% across the area had no preference in regard to electric vehicles. 33% would use them as long as it did not adversely affect price and just 1% said they would use them and pay more. The highest proportion in favour was in Huddersfield, with 42% saying they would use them as long as it did not increase cost.

In terms of having opportunity to pay fares by card, those in Dewsbury and Huddersfield would both tend to still pay cash (65% and 59%). In Holmfirth, 69% would be happy to use as long as it did not increase prices.

In terms of need of adapted licensed vehicles, none in Holmfirth interviewees needed or knew anyone that needed any form of adapted vehicle. Huddersfield had 71% without need with Dewsbury 81%. This was lower than the overall value of 92% in 2017 suggesting need may have increased. In Dewsbury, the main need is for WAV style whereas in Huddersfield the split is more even though still in favour of WAV style vehicles.

When asked if they thought people in Kirklees with disabilities got a good service from hackney carriages, 42% said they did in Dewsbury, 65% said they did in the Huddersfield sample, and just 20% felt they did in Holmfirth. All others said they did not know.

Many interviewees told us their views about if there were enough hackney carriages in the area overnight. 72% said yes in Huddersfield, 78% in Dewsbury and 95% of those interviewed in Holmfirth. In 2017, the slightly different question if people could get hackney carriages when they needed them provided a response of 50% saying yes in the daytime and 47% at night. The current responses again suggest hackney carriages seem to be more available now than they were in 2017 in public views.

The issue of latent demand was investigated using the industry standard, court approved method. This invites people to say if they had ever given up either waiting for a hackney carriage at a rank, or when hailing, and if they have invites them to say where to confirm they are actually referring to hackney carriages (despite careful questioning, many often still quote giving up when having booked a private hire or hackney carriage, or name places that are not ranks, or ranks in other areas).

In Dewsbury there were six valid responses within Kirklees, suggesting a value of 1.08. In Huddersfield there were 11 valid responses, suggesting 1.11. For Holmfirth, all responded but only one said they had given up waiting at a rank, in Holmfirth Victoria Street, giving a value of 1.04. The combined area rank latent demand factor is therefore 1.09.

Only Huddersfield saw latent demand for hailing a hackney carriage, with all five responses valid, giving a factor of 1.025. The combined area latent demand factor is therefore is 1.115

These values are higher than the 1.005 estimated in 2017, albeit only for rank-based latent demand.

# 5 Key stakeholder consultation

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

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

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

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

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

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

Further listing of who has responded and how is normally provided in Appendix 6 but ensuring privacy where appropriate for those contacted.

Unfortunately, this element of work was victim to the coronavirus epidemic. Once the lockdown occurred, it was not felt reasonable that we should try to consult those who might be strongly engaged in supporting people through the pandemic, or whose businesses were presently closed down or severely restricted. When in early July attempt was made to cover the supermarket group, their phone systems made it clear they were still focussing on customer need in store so would not be able to respond to other questions. Other groups were only just returning to normal so it was not felt sensible to contact them at this time. However, where email contact details were found, two attempts were made to contact such stakeholders. Whilst some confirmed receipt of emails, none made any other response.

The impact of this on the results are not likely to be significant, as it is very rare that input from key stakeholders is vastly different to the responses provided by the general public and from the rank observations. Further, the 2017 set of key stakeholder responses had generally provided positive feedback on the service with no real negative issues raised.

Appendix 7 contains the details of passenger numbers for all rail stations in the Kirklees area. The authority has 15 rail stations. The largest is Huddersfield, operated by Trans Pennine Express and 104th largest in terms of the volumes of people entering and leaving up to March 2019 (the latest year for which statistics are available). In that year there were just under 4.9 million passenger entries and exits. While this has increased by 191% since the start of collection of data in 1997/8, the last three years saw a reduction of 3% potentially following the impact of operating issues and problems with both new timetable introduction and that of new trains.

The next largest station is Dewsbury, which was 365th with just under 1.7m passenger entries and exits. Growth was similar with 207% since the start of information and -2% since the last survey. All other stations are operated by Northern and have annual passenger numbers ranging from just under 452,000 (955th, Mirfield) to just under 20,000 (2,225th out of 2,630 stations), with recent growth of -6% and no growth since statistics began. Eight stations had less than 80,000 passengers per year, or 800 leaving per week, very unlikely to generate any hackney carriage-based demand.

# 6 Trade stakeholder views

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

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

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

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

In all cases, we believe it is essential we document the method used clearly and measure response levels. However, it is also rare for there to be high levels of response, with 5% typically felt to be good and reasonable.

As is the usual practice, it was planned to issue this driver survey following successful completion of the rank work, to ensure there were no undue alerts to the trade that might have led to 'playing up' to the rank work being undertaken. This was ready to be issued by Friday 20th March but in the end was not issued on that date.

However, on Monday 23rd March England was placed into full lockdown starting that evening. The questionnaire was amended to encourage drivers to complete the survey for the situation during February 2020 and issued in early April giving till mid-May for responses to be returned. Many came by the on-line link, others were returned to the licensing office, scanned and forwarded, or scanned and emailed direct to us by drivers, and a limited number were posted.

In the end, some 132 responses were received. This is around a 6% response rate from the entire driving population, a very good level for a total driver response. The responses were reviewed for any multiple responses by checking quoted driver references and no obvious duplicates were identified. This is a very much better response that that in 2017, which was just 11 and only considered as indicative.

Of the response, 69% said they drove private hire vehicles, 22% hackney carriage, 3% said they drove either vehicle and 6% said they did not drive a vehicle. This is a very strong representation from the private hire element of the trade, unusual for this kind of survey that is often believed to only be relevant to hackney carriages by those in the private hire element. However, even the indicative response from 2017 was similar with 64% of those responding saying they drove private hire.

For all respondents, the average quoted level of service in the trade in the area was 12 years (similar to the 13 of 2017). However, the hackney carriage sample had a much higher average of 20 years with the private hire lower at 10 years. However, the longest level of service of 44 years was only marginally more than the level of 39 years quoted by those from the private hire side.

86% told us how many days they had worked in the period around the rank surveys. 33% each said five and six days. 11% said seven days, 10% four days, 5% three days, 3% each two or no days, and 1% said a single day. Comparing hackney carriage and private hire working profiles, the level working six days was very similar, but more hackney carriage said they worked seven and less said they did not work, or only worked one day.

The average days worked was five. The value was marginally higher for hackney carriage compared to private hire.

Average hours worked were 35 (fairly similar to the 31 quoted in 2017), with a value slightly higher for hackney carriage only, and higher again for private hire only, but not to a significant level (36 and 37 hours respectively). The quoted longest hours worked for hackney carriage was 70 hours compared to 78 for private hire.

Most gave at least one issue that affected when they worked. Some provide multiple responses. Of all the responses received, the top value was 25% for family commitments. 19% said they worked busy times, but 17% said their hours were chosen to avoid disruptive passengers. This is a significant increase from the none saying this in 2017. 10% had their hours affected by sharing a vehicle.

79% said they owned their own vehicle and 13% said that someone else also drove the vehicle they drove. Times vehicles were used by others were equally split three ways between days, nights and weekends.

68% of private hire and 52% of hackney carriage said they accepted pre-bookings. This amounted to 55% overall of all those responding (including those who said they drove both kinds of vehicle). A range of different methods were named for how these pre-bookings were actually obtained. These ranged from passengers making a return booking when leaving a vehicle through use of diaries, PDA's and offices to online and apps. The hackney carriage responses had two that made the booking direct with the driver, and another that said most pre-bookings were people asking for a return trip. It was clear that several took bookings – many from private hire companies but others from hackney carriage only booking operations. One private hire said they had chosen to work on a private hire operation as there was not enough work to justify hackney carriage style operation.

29 different companies were named. Only eight were named more than once. The top quoted company, with 24% of mentions, was a national app-based operation. The next two highest companies obtained 18% and 13% of mentions, with another getting 4% and four others 3%, with all others just gaining a single mention, about 1% of the response. Three of the singly named companies appeared to be hackney carriage radio operations, with most others being private hire companies.

Interestingly, many of the companies had been mentioned in the on-street questions, with the top companies used by vehicles matching the top two companies quoted by the public, however with the exception of the app-based company which was less mentioned by the public than by the trade.

Drivers confirmed the ranks they made use of. Most gave more than one. There were around 11 private hire who also named ranks, many of which were in the outer areas although some quoted use of central Huddersfield ranks. Of all the mentions made, the most popular location stated to be used was Huddersfield Station, with 21% of the mentions. John William Street had 18% and the bus station 13%. Batley and Dewsbury got 6% of mentions each, with Birstall 4%, and Dewsbury Market and George Square 3% each. Four other locations, only one of which was recognisable (Cross Church Street) obtained 2% and the remainder, many of which were either out of town or unknown, obtained just 1% each. This suggests a wide range of rank usage by hackney carriages across the area.

Just one driver said they used the rank in Holmfirth. Ranks made up about a fifth of their work, but they commented that there was insufficient rank work so they worked for two private hire companies. One of the companies named was based in Huddersfield but was one of those mentioned by the public response to companies used in Holmfirth.

39% of those responding felt there were issues with operation of the ranks. Most simply suggested there were not enough spaces and too many hackney carriage vehicles. There were no real suggestions of how spaces could be added nor specification of where the shortages were, apart from one comment about the Station rank. Two private hire said there needed to be places for private hire to wait between jobs.

Many told us where they went if the rank they first went to was full. The largest proportion (23%) said they kept driving round till a space became available. One said this was preferable to getting a parking ticket. However, 19% said they went to a rank where there was space. 15% said they gave up and went home. A small number said they would go and wait at their base, with many others giving other answers. The remaining answers were hard to allocate to specific categories, being very individual to those quoting them.

Drivers were asked if the number of hackney carriages should continue to be limited. 74% said yes. This included all but one hackney carriage (who did not answer the question), 75% of those that drove both hackney carriage and private hire, and 62% of private hire. This suggests a good cross section support the limit.

People were asked how having the limit benefitted the public. Some used this question to say they did not think it did benefit. However, several said it provided a better service, that it reduced congestion and that it helped passengers be more likely to recognised their drivers.

When asked if drivers thought there were enough hackney carriages licensed in Kirklees, 84% said they thought there were.

In terms of how drivers obtained their fares, whilst 27% said they got fares exclusively from the rank, half said they got up to 25% from hailing. Most of the hackney carriages were significantly dependent on ranks, often with hailing making up the remainder.

However, for private hire only 14% got all their work from phone bookings although it was not clear what other sources they used. There were 5% that said they obtained all their bookings from ranks, but it was not clear if they had somehow misunderstood this question as there was no evidence if they actually meant this. Not many seemed to have school contracts, although these were spread between hackney carriage and private hire. One hackney carriage said they got 80% of their fares from school contract and the remainder from the rank.

Most of the additional comments reflected that drivers thought there were too many hackney carriages and certainly no need for more. However, as always, there were a few private hire who would have liked a hackney carriage plate, and some wanting private hire vehicle numbers limited.

# 7 Evaluation of unmet demand and its significance

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

| Element | 2020 | 2017 | 2013 |
|---|---|---|---|
| Average passenger delay | 0.08 | 0.017 | 0.87 |
| Prop travelling in hours with over 1 min APD | 1.88 | 0.06 | Zero |
| Off peak hours with any delay | 10.10 | 10.26 | 12.12 |
| Seasonality | 1 | 1 | 1 |
| Peakiness | 0.5 | 0.5 | 1.0 |
| Latent | 1.115 | 1.005 | 1.003 |
| Overall ISUD index estimate | 0.88 | 0.01 | Zero |

The table shows the ISUD index has increased survey on survey, from a level of zero in 2013 to 0.01 in 2017 to 0.88 now. However, given the cut-off value is 80, this level remains insignificant and demonstrates no unmet demand that is significant at this point in time, and therefore no need to review either the limit, nor the level it is set at in terms of extra licences. The trend towards significance of observed unmet demand is also only very marginal.

The overall level of average passenger delay, the proportion of passengers travelling in hours with over a minute average passenger delay, and the latent demand factors have all increased. Off peak hours with delay have reduced slightly whilst all other factors have remained the same. These impacts come from the increased demand observed at Holmfirth Victoria Street, and seem logical.

Even without the impact of the coronavirus on the trade, the results give no cause for concern and provide evidence that the present limit policy is possible to be retained. Further discussion in context is provided below.

# 8 Summary, synthesis and study conclusions

This hackney carriage unmet demand survey on behalf of Kirklees has been undertaken following the guidance of the BPG and other recent case history regarding unmet demand and its significance. This chapter first summarises the salient points from each previous chapter, then draws the separate sources of information together and completes with a study conclusion. Specific recommendations are provided in the subsequent chapter.

***Background and context***

This study was undertaken principally between mid-January and mid-March 2020 over a similar timeframe to the previous work in 2017. On street interviews and rank observations were undertaken in mid-March but in advance of the main impacts of the Coronavirus epidemic resulting in the 23rd March national lockdown. Licensed vehicle driver and other trade opinions were obtained during the early part of the lockdown, but with a specific request that was generally complied with that responses were for the period in March consistent with the rank surveys. The only element that suffered strongly was the key stakeholder consultation which has not yielded any result, although this is not a significant shortfall (discussed further below).

Local council policy towards transport is within the gift of the local authority and in summary states that "hackney carriages and private hire vehicles are a valuable part of our transport system, providing more choice for whole or part journeys…and a valuable service for those with disability or mobility impairments". There is a strong encouragement to enhance rank provision whilst encouraging take-up of low emission vehicles whilst promoting mobility as a service aspects.

Private hire vehicle numbers continue to show strong growth whilst the level of hackney carriages has remained stable with the limit policy. Hackney carriages are now 9% of the fleet compared to being 24% in 1999. Dual driver numbers remain generally growing.

There has been recent growth in the number of private hire operators based in the areas.

WAV fleet share of the total have been stable for a while but show recent slight reduction, in both fleets, although this may be catching up with reality rather than showing a real reduction given some issues with recording of which vehicles were actually WAV in the past.

This current survey is the latest in a series believed to cover at least 2005, 2010, 2013 and 2017 together with this 2020 survey. Although there is some uncertainty it is believed the formal level of the limit remains at 224 in the records available to us.

***Rank observations***

Rank provision has remained similar to that in 2017 although some locations have seen their principal demand generator disappear. The only possible extra location put in place was the night provision in Holmfirth Bus Station.

An element of 'quick-watch' rank data collection was added to provide confidence in operating hours current at Holmfirth Bus Station rank. This also reviewed the operation with reference to actual against legally defined hours. 71% of the observations at or near ranks related to local hackney carriage movements, with 14% being private cars and 10% private hire vehicles.

Over a quarter of observed rank activities were at Huddersfield Station and slightly less at John William Street, Huddersfield. Levels of hackney carriage vehicle recordings followed a similar pattern but with a stronger emphasis on the Station volumes. The worst level of potential misuse by private vehicles was at a rank that is part time with relatively poor marking in terms of discouraging other usage. The next worst location was in an area with high pressure on kerb space and lower levels of hackney carriage service, rarely using the relatively high capacity of rank spaces.

Apparent private hire misuse focussed on one part time rank and another rank where a private hire office is nearby, with little other locations nearby for vehicles to collect passengers.

As already noted, the top two active rank locations are Huddersfield Railway Station and John William Street, Huddersfield. The station has about a third of total passenger demand whilst John William Street has around a fifth. In 2017 these two provided half the passengers, in the current survey this total is now 41% of the total.

Holmfirth Victoria Street night rank saw continued growth taking it to being third busiest overall with just over 14% of total passengers estimated in a typical week. Both Huddersfield Bus Station and Cross Church Street rank have also seen growth in usage. The top four ranks now provide 76% of all estimated passenger demand compared to 71% in 2017. This has been at the expense of the lesser-used rank locations. Two further ranks are now redundant compared to the 2017 list, one the result of closure of its associated night life.

Net average passenger levels are estimated to be 11% lower now than in 2017 overall. Much of this was the impact of the loss of night life.

The demand profile sees growth from Thursday to Friday to Saturday, with the latter two days being most similar. However, Saturday sees a very sharp peak which defines the area as having 'peaky demand'.

The top two ranks provide all day and night demand, with the central rank operating longer hours than the station location. The bus station rank in Huddersfield focusses on daytime service whilst the Holmfirth ranks only see night demand. Despite reductions in use, the range of other ranks across the area remain important and valuable.

Just 6% of the observed rank hours saw any average passenger delay, with two thirds of this having an average over all passengers less than a minute. Across all hours there were just four examples of passenger waits of 11 or 12 minutes. 0.3% of the total experienced delays of 6-10 minutes. Average passenger delay across the full survey was just five seconds, almost nothing.

During sample observations, 58% of the hackney carriage plates were seen, compared to 62% three years ago. The results found that Birstall and Batley, and to a lesser extent Dewsbury hackney carriage fleets tended to work only in their specific areas. Holmfirth drew its vehicles in from other locations, ableit mainly Huddersfield.

24% of observations were late night at Huddersfield Railway Station rank. 18% were at Holmfirth.

Overall, the rank work suggested that hackney carriages remain providing a borough-wide service despite having freedom to service any point within the area.

There appeared to be a focus of WAV style vehicle servicing ranks, with a higher proportion seen than actually within the fleet. An increased level of seven people were observed using wheel chairs to get hackney carriages at ranks in the area, with nearly half of these at Huddersfield rail station rank.

***On street public views***

A robust and valid on street set of interviews essentially capture local people in the streets, although for Holmfirth just 64% said they were from the Borough, with others from Sheffield and Wakefield postcodes. Access to a car was relatively high in most places and very high in Holmfirth.

On average, 71% had used a local licensed vehicle in the last three months. This is marginally increased from 2017. Huddersfield had the highest usage at 78% with Holmfirth the lowest at 48%. The average level of trips per person per month had gone up very slightly overall since 2017. Different areas had different profiles of usage. Across the area, 22% got licensed vehicles from ranks, 13% used and app and 4% hailed. These show an increase in all values since 2017, with apps mainly taking from standard phone usage. Again specific area profiles were very different.

The smaller locations generally had more people not able to remember their last use of a hackney carriage, with the area average of 48% still a reduced level compared to the previous survey, again consistent with increased usage of hackney carriages at ranks.

Apart from Dewsbury, where a high proportion could not remember seeing a hackney carriage, there was good awareness of hackney carriages. However, overall usage levels in terms of trips per person per month were low, with even Huddersfield only producing 1.1 trips per person per month for hackney carriages.

Similarly to the hackney carriage fleet disposition, each main area tended to have its own private hire company dominant, although there were also a very high number of operators overall quoted. The two largest companies also used apps. The one national app quoted was only mentioned in Huddersfield. People also tended to keep to their own areas in terms of rank knowledge, although most people knew about the Holmfirth rank irrespective of where they were interviewed.

The top known rank was Huddersfield Station (27%) and then John William Street (16%).

Views about the service provided varied across the area, with Dewsbury interviewees having the least favourable response to their last trip.

Feelings of being safe were higher in the daytime and quite a bit lower for night – with much impacted by an apparently well-known violent attack at Huddersfield Bus Station during 2019.

There was no strong support for move to electric vehicles nor for introduction of card payment facilities.

There seemed to be a good appreciation that people with disabilities obtained a good service in the area, and some evidence that there might be relatively higher numbers needing WAV than is often the case.

The questions suggested people were more confident there were enough vehicles available at night now compared to the response three years earlier.

The estimate of overall latent demand was 1.115 with only Huddersfield seeing any latent demand for hailing.

***Key stakeholder views***

Despite attempts being made, the current Coronavirus situation precluded any response being made. This element of the survey rarely tends to find major issues with the service provided, and the lack of response does not reduce the robustness of the conclusions made given the strength and consistency of other evidence.

***Trade views***

The very good 6% response, also found to be comprehensive in terms of types of driven vehicle, found most drivers tended to work five days and 35 hours. 17% said they chose working hours to avoid disruptive passengers, a strong increase from no response saying this in 2017. Vehicle ownership levels were very high at 79%. Just over half of the hackney carriage fleet accepted pre-bookings.

The main company named as providing bookings was a national-based app company (24% of mentions), with the next two highest companies scoring 18% and 13% respectively. Some hackney carriage radio operations were named.

The ranks quoted as used were the railway station, John William Street and the bus station as the top three. Respondents also mentioned ranks in the smaller locations.

23% said if the first rank they got to was full they would drive round and find a space elsewhere. 15% said they would give up and go home.

74% supported retention of the vehicle limit. This included many private hire drivers. The trade suggested the public benefitted from this by it providing a better service for them, reducing congestion and increasing the potential for passenger to recognise drivers.

27% said they got fares exclusively from ranks, but half said they got up to 25% from hailing. There was a suggestion that many private hire servicing an app considered their pick-ups to be 'rank' based. This is a response we have found in other locations.

***Formal evaluation of significance of unmet demand***

Although most elements and the index of significance of unmet demand (ISUD) have increased in successive surveys, the overall value of 0.88 remains a very long way from ever suggesting the level of unmet demand is significant (at a value of 80). The trend toward significance is itself very marginal.

***Synthesis***

There is a consistent picture suggesting an overall general increase in usage of hackney carriages in many places in Kirklees. However, the overall picture is very dependent on several very specific sources of rank patronage, which make them very vulnerable to this source of usage. This is consistent with an increase in the level of the ISUD value although the overall level remains a long way from being significant.

Whilst a high proportion of the trade respondents were related to a national company, the public gave more precedence to local companies quite strongly. This went to the extent that they named two local apps almost to the exclusion of any national ones. Whilst there was clearly a local element both to trade operation and to public views, the overall trend was a positive view of the service provided.

Huddersfield station saw some 48,976 passengers leave the station in an average week for the latest year available. The rank passenger numbers suggests that 6% of these left in hackney carriages, assuming all the station rank passengers were from rail services. Interestingly, the growth of rank passengers at -3% was the same as the rail statistic reduction of 3% in overall patronage. This corroborates our data collection and suggests the concern that the slight reduction here might be due to the upcoming pandemic is unfounded.

All the information points clearly towards the vehicle limit policy providing public benefit across the whole of the Kirklees area. Despite the overall hackney carriage fleet level being a small proportion, it clearly provides a high level of value to people and their travel needs. It is very important to the developing Holmfirth night economy.

With reference to Holmfirth, the rank / vehicle observations, the driver survey and the public interviews all painted the same picture. Daytime demand for licensed vehicles there is very low and generally met by people booking private hire vehicles. At night a good range of hackney carriages very ably meet the specific demand there although this is almost exclusively via standard rank operation rather than through any other methods. This may relate to the night clientele being from different places around the area (supported by the public interviews there having the highest level of out of area interviewee, and also covering a wide range of postcodes). This location is also a great example of how flexible the local licensed vehicle trade are to specific demand requirements.

***Conclusions***

The most important conclusion is that the level of observed unmet demand is a long way from being significant in terms of Section 16 of the 1985 Transport Act. The limit on vehicle numbers can therefore be retained and there is no need to add any further plates.

The overall picture of the hackney carriage demand in Kirklees at the start of 2020 was relatively optimistic and positive. While there is evidence of increased usage both of licensed vehicles overall, and also of hackney carriages at some ranks, the overall conclusion of about 11% reduced demand compared to three years ago seems mainly to arise from specific closure of key demand generators.

The hackney carriage trade is generally well-known and appreciated across the area, and is active across all main settlements, not just focussed in Huddersfield. The hackney carriage trade is particularly important to the developing night life of Holmfirth, and the trade are working hard to ensure needs there are met.

The vehicle fleet size in the area is always likely to tend to be higher than the level of population might suggest because there are several specific niche operating areas who have sufficient work in some manner to avoid them needing to work in busier areas at any time. The exception is Holmfirth, where various vehicles work together to service that requirement, providing what is a critical and essential support to a key developing part of the economy.

# 9 Recommendations

On the basis of the evidence gathered in this hackney carriage unmet demand survey for Kirklees Council, our key conclusion is that there is no evidence of any unmet demand for the services of hackney carriages either patent or latent which is significant at this point in time in the licensing area. The committee is therefore able to choose to retain the present vehicle limit policy, and to do so at the present level of 228 vehicles.

Given that the level of unmet demand was far from being significant, in fact almost negligible (albeit increasing marginally), and this was obtained with the current fleet of 223 vehicles, it would be possible to reset the limit to that level and be sure this would remain sufficient to meet observed demand at least over the current life of this survey of three years.

In normal circumstances, fresh observations at ranks and new collection of a database of information to support the limit policy, would be required no later than March 2023. This target should be retained.

Consideration should be given, however, to policies and measures that ensure that the viability and supply of hackney carriages up to the current level should be encouraged and maintained to support the development of the local economy. The challenges of the current pandemic need to be faced in such a way to help the hackney carriage trade remain in a place that it will be able to support and supplement development of the economy into the new normal.

## Appendix 1 – Industry statistics

**Kirklees**

DfT stats say limit began in 1974

| | hcv | phv | lv total | dual drivers | | Operators | % hcv WAV | % phv WAV |
|---|---|---|---|---|---|---|---|---|
| **1994D** | 193 | | | 1000 | **1994D** | | | |
| **1997D** | 219 | 723 | 942 | 1349 | **1997D** | | 14 | |
| **1999D** | 225 | 700 | 925 | 1400 | **1999D** | 140 | 16 | |
| **2001D** | 217 | 917 | 1134 | 1700 | **2001D** | 150 | 22 | |
| **2004D** | 217 | 917 | 1134 | 1700 | **2004D** | 150 | 15 | |
| **2005D** | 217 | 917 | 1134 | 1700 | **2005D** | 150 | 22 | |
| **2007D** | 217 | 917 | 1134 | 1700 | **2007D** | 150 | 22 | |
| **2009D** | 213 | 917 | 1130 | 1700 | **2009D** | 150 | 22 | |
| **2010N** | 217 | 1140 | 1357 | *2093* | **2010N** | *140* | 28 | _ |
| **2011D** | 216 | 1351 | 1567 | 2485 | **2011D** | 130 | 25 | 9 |
| **2012N** | 217 | 1140 | 1357 | *2510* | **2012C** | *127* | 28 | *7* |
| **2013D** | 216 | 1532 | 1748 | 2535 | **2013D** | 124 | 22 | *5* |
| **2014N** | 218 | 1594 | 1812 | *2594* | **2014N** | *122* | 21 | *4* |
| **2015D** | 222 | 1678 | 1900 | 2653 | **2015D** | 119 | 21 | 5 |
| **2017C** | 219 | 1895 | 2114 | 2861 | **2017C** | 116 | 21 | 5 |
| **2017D** | 220 | 1910 | 2130 | 2877 | **2017D** | 117 | 22 | 7 |
| **2018D** | 219 | 2007 | 2226 | 2910 | **2018D** | 129 | 22 | 6 |
| **2019D** | 235 | 2039 | 2274 | 3308 | **2019D** | 151 | 22 | 5 |
| **2020C** | 222 | 2212 | 2434 | 3079 | **2017C** | 142 | 20 | 4 |

## Appendix 2 – List of ranks

See table within Rank Chapter for full current list.

## Appendix 3 – Timetable of rank observations

***Please see separate document***

## Appendix 4 – Detailed rank observation results

***Please see separate document***

## Appendix 5 – Detailed on street interview results

***Please see separate document***

## Appendix 6 List of Stakeholders consulted

| Key consultee | Response |
|---|---|
| **Supermarkets** | |
| Asda Longhill Road | U |
| Tesco Viaduct Street | U |
| Asda Aspley | U |
| Morrisons Penistone Road | U |
| Sainsburys Southgate | U |
| Iceland, Carpitt Road | U |
| Aldi, Wakefield Road | R |
| Sainsburys, Market St | U |
| | |
| **Hotels** | |
| The New Huddersfield Hotel | E |
| Cambridge Hotel | E |
| Heath Cottage Hotel | U |
| Briar Court Hotel | E |
| The Ashfield Hotel | E |
| Cedar Court Hotel | E |
| | |
| **Restaurants / Cafes** | |
| The Canton Chef, Huddersfield | U |
| De Sandro Pizzeria Ristorante | E |
| Zucchinis Restaurant Batley | U |
| The Sheaf | U |
| Poppa Piccolinos | U |
| | |
| **Entertainment** | |
| Lawrence Batley Theatre | U |
| Mecca Bingo | E |
| | |
| **Public Houses** | |
| Silver Birch, Cleckheaton | E |
| The George, Cleckheaton | Gone |
| The Dandy Lion | U |
| Horse and Jockey Birstall | U |
| Legends, Batley | U |
| Frontier, Batley | Gone |
| Old Turk, Dewsbury | E |
| Should of Mutton, Holmfirth | E |
| The Bridge, Holmfirth | E |
| The Nook | E |
| The Cherry Tree Wetherspoons | U |
| Rat and Ratchet | E |
| | |
| **Night Clubs** | |
| None had reopened or had contact details available. | |

**Key:**

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

E – email sent but no response received despite chasing

A – email sent and acknowledged but no other response

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