REPORT TITLE: Hackney Carriage Demand Survey
Licensing and Safety Committee – Wednesday 14th February 2024

Cabinet date	**N/A**
Cabinet Member	**Councillor Mussarat Pervaiz**
Key Decision **Eligible for Call In**	**No** **No**
Purpose of Report The purpose of this report is to inform members of the outcome of the survey to measure demand for hackney carriages within the district.	
Recommendations Members are asked to consider the outcome of the study and relevant guidance. The options are: - • Note the report. • Continue to limit the number of hackney carriage vehicle licences to 224. • Release an additional set number of licences (possibly for wheelchair accessible and/or electric vehicles). • Lift Quality Restrictions altogether. **Reasons for Recommendations** • If members are minded to consider to release an additional number of licenses or lift quality restrictions this will require formal consultation and you will be required to instruct officers to carry out a consultation before bringing back the results for a final decision.	
Resource Implications: There will be human resource and cost resource implications if members consider releasing additional licences or lift quality restrictions.	
Date signed off by Strategic Director & name **Is it also signed off by the Service Director for Finance?** **Is it also signed off by the Service Director for Legal Governance and Commissioning?**	Rachel Spencer-Henshall – 26.01.2024 Isabel Brittain – 31.01.2024 Julie Muscroft – 25.01.2024

Electoral wards affected: All

Ward councillors consulted: None

Public or private: Public

Has GDPR been considered? Yes, there is no personal data contained in this report.

1. Executive Summary

1.1 For Members to consider whether the Council should continue to impose quantity restrictions on hackney carriage vehicle licences.

2. Information required to take a decision

2.1 Kirklees Council currently restricts the number of hackney carriage vehicle licences to 224 for the whole of the district. The present legal provision on quantity restrictions for hackney carriage vehicles outside London is set out in Section16 Transport Act 1985.

2.2 Until this Act local authorities had unrestricted discretion to limit the number of hackney carriage vehicles which they would licence, section 16 removed this discretion. In essence, the effect of section 16 means that before a local authority can refuse an application for a hackney carriage vehicle licence, in order to limit the number of licensed taxis, they must be satisfied that there is no significant demand for the services of taxis, within the area to which the licence would apply, which is unmet.

2.2 In accordance with the Department for Transport's Best Practice Guidance issued in December 2023, those authorities who restrict the number of hackney carriage vehicles, should complete a survey at least every 5 years in relation to whether there is any significant unmet demand for hackney carriage vehicles and aligned to the production of Local Transport Plans where possible. This is a change to the previous Best Practice Guidance which required demand surveys to be completed every 3 years.

2.2 The previous survey was carried out in 2020, and at the meeting of the Licensing and Safety Committee on 17th December 2020, members resolved that the report and study conducted by Ian Millership of Licensed Vehicle Surveys and Assessments ("LVSA") be noted and in line with the officer recommendations the number of hackney carriage vehicle licences be limited to 224.

2.3 The 2023 study has again been conducted by Ian Millership from Licensed Vehicle Surveys and Assessment ('LVSA'), a summary of findings of the study will be presented to members of the committee at the meeting by Mr Millership and a full copy of the final report is attached at **Appendix 1.**

<u>Methodology</u>

2.4 The following methodology was used to conduct the study: -

- Review of relevant policies and standards to understand the authority's aspirations for meeting the travel needs of residents, and social inclusion and to provide context to determining the overall demand and how this should be met.
- 395 hours of rank observations were included in the detailed assessment of demand across the area.
- Audit of the ranks, including, monitoring passengers' waiting time, use of hackney carriage vehicles by wheelchair users and rank audits.
- Stakeholder consultation including members of the public, licensed trade, supermarkets, hotels, pub watch / individual pubs / night clubs, other

entertainment venues, restaurants, hospitals, police, disability representatives, rail operators, and other council contacts.

<u>What is unmet demand?</u>

2.5 Unmet demand is where a person turns up at a hackney carriage rank and finds there is no vehicle available for immediate hire.

<u>Overall Conclusion</u>

2.6 In summary the study considers that there is no unmet demand within Kirklees and the recommendation is to retain the limit. Whilst the level of demand suggests some spare/unused plates could be removed, on balance the report concludes that it is better to leave the few available to meet demand if required.

2.7 It is pleasing to see that the report still states that the hackney carriage trade is generally well-known and appreciated across the area, and is active across all main settlements, not just focussed on Huddersfield. The findings of the survey have found the hackney carriage trade is particularly important to the developing night life of Holmfirth, and the trade are working hard to ensure the needs there are met.

3. Implications for the Council

3.1 Working with People

One of the Licensing Services key priorities is to ensure that we maintain our high standards across the private hire and hackney carriage trades in order to protect the travelling public and ensure residents of Kirklees and the whole of West Yorkshire are transported safely and protected from harm and that they experience a high quality, clean, sustainable and green environment, as well as improve the customer experience.

3.2 Working with Partners

In developing its policies, the licensing service works with a number of partners, including but not limited to Kirklees safeguarding children’s board, West Yorkshire Police, Public Health, Environmental Health, Community Safety Partnership, other West Yorkshire licensing authorities, and any other relevant partners.

3.3 Place Based Working

There is no specific impact in the context of this report.

3.4 Climate Change and Air Quality

There is no specific impact in the context of this report.

3.5 Improving outcomes for children

The Council wants to ensure children have the best start in life and to ensure that the people of Kirklees feel safe and are protected from harm. The Council has a duty to protect the travelling public and safeguard children travelling in licensed vehicles, in particular when travelling alone for the purpose of home to school transport.

3.6 **Financial Implications**

There are no financial implications, the cost of the survey and report are covered by the licence fees for the hackney carriage vehicles.

Should members resolve to increase the number of hackney carriage vehicles or remove the limit altogether, there will be financial implications involved in the consultation that will be required.

3.7 **Legal Implications**

The principal legislation that covers Hackney Carriage and Private Hire licensing is the Town Police Clauses Act 1847 and the Local Government (Miscellaneous Provisions) Act 1976.

The role of taxis and private hire vehicles detailed in the Department for Transport "Taxi and Private Hire Licensing Best Practice Guidance" states:

Taxis and private hire vehicles play a vital part in local transport, connecting residents to the local economy and in enabling businesses and residents to reach wider transport networks. All social groups use taxis and private hire vehicles. Groups that use them the most are low-income young women, amongst whom car ownership is low, and those with mobility difficulties.

The taxi and private hire vehicle sector is entirely demand-led. Though these services are most often associated with journeys for leisure, social and business purposes, they are an important part of the transport network and should be considered as part of local transport planning.

Taxis and private hire vehicle services reduce the need for private car ownership, enable key workers to commute when other modes are unavailable, provide door-to-door transport for those that are not able to travel via other modes and assist on meeting the needs for home-to-school transport provision. Taxis and private hire vehicles have a particularly important role in the night-time economy getting people home safely late at night.

The primary and overriding objective of licensing must be to protect the public. It is for licensing authorities to ensure that their licensing policy and requirements are proportionate, so that passengers can choose from a wide range of safe services.

3.8 **Other (eg Risk, Integrated Impact Assessment or Human Resources)**

<u>Human Resources</u>

There are no human resource issues in respect of this report.

<u>IIA</u>

There is no requirement for an IIA in relation to this report.

4. Consultation

4.1 LVSA consulted as noted in paragraph 2.4 of this report and in detail within the final report shown at Appendix 1.

5. Engagement

5.1 This is covered in the final report as shown at Appendix 1.

6. Options

6.1 Options considered

6.1 Members are asked to consider the outcome of the study and relevant guidance.

The options are:

a) Note the report and the study by LVSA

b) Continue to limit the number of hackney carriage vehicle licences to 224

c) Release an additional set number of licences (possibly for wheelchair accessible and/or electric vehicles)

d) Lift quality restrictions altogether

6.2 Members should note that should they be minded to consider options c or d above they can only do so following formal consultation and so should instruct officers to carry out a formal consultation before bringing back the results for a final decision.

6.2 Reasons for recommended option

The results of the survey show there is no unmet demand within Kirklees therefore, it is recommended that members resolve to maintain the existing limit of 224 hackney carriage vehicle licences.

7. Next steps and timelines

7.1 It is recommended that members: -

- Note the report and study completed by LVSA; and
- Resolve to agree to maintain the limit of 224 hackney carriage vehicles in Kirklees

7.2 If members are minded to consider to release an additional number of licenses or lift quality restrictions this will require formal consultation and members will be required to instruct officers to carry out a consultation before bringing back the results for a final decision.

8. Contact officer

Fiona Goldsmith

Group Leader – Licensing
Tel: 01484 221000 (ext 79921)
Email: Fiona.goldsmith@kirklees.gov.uk

9. Background Papers and History of Decisions

Agenda for Licensing and Safety Committee on Thursday 17th December 2020, 10.00 am | Kirklees Council

Agenda for Licensing and Safety Committee on Tuesday 18th July 2017, 10.00 am | Kirklees Council

10. Appendices

Appendix 1 – Demand Survey

11. Service Director responsible

Katherine Armitage
Service Director – Environmental Strategy and Climate Change
Tel: 01484 221000
Email: Katherine.armitage@kirklees.gov.uk

Appendix 1

Kirklees Council
Hackney Carriage Unmet Demand Survey
November 2023

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.

Results of this latest survey, whose rank observations were undertaken in late April 2023, found remarkable similarity in the operation of the hackney carriage fleet compared to the situation immediately pre-pandemic (early 2020). Overall observed usage of hackney carriages at ranks across the area is down just 3%, well against the national trend of significant decreases. This is also despite increase in app usage although this seems mainly to have impacted on private hire booked trips.

Though the trend of increasing focus on the larger ranks continues, and some further small ranks have effectively ceased being used, other new ranks observed this time are well-used, with particular growth continuing in Holmfirth albeit only at nights. There is evidence the limit policy has provided stability through a difficult period and that it continues to provide public benefit in terms of levels of service enjoyed by those using ranks in the full area.

The national issue of increased abuse of ranks by private cars is present here and this needs to be communicated to those that can enforce and reduce such abuse, which can lead to unmet demand and public safety issues when vehicles cannot easily service public at specific ranks when needed.

Though the very low level of unmet demand gives the opportunity that the spare plates could be extinguished, balance suggest these should be left to allow for any growth that occurs.

The excellent service evidenced in this survey needs to be applauded and noted particularly how the night life in Holmfirth is being supported in its development.

Plans need to be in place to ensure the repeat of rank work and allied supporting information can be gathered with ranks covered no later than March 2026, including ensuring finances will be in place. This is subject to any change in overall legislation or policy which at this point in time seems unlikely to occur.

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. A revised full Best Practice Guidance document was issued and consulted upon during 2022 but despite its final issue being noted as 'imminent' at the time of writing this Report, nothing had been issued, and certainly all our work was undertaken well before any introduction of the revised BPG.

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 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 wheelchair 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 wheelchair 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 wheelchair 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 see further complication with specific rules by education transport authorities.

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 wheelchair 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 required 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).

Recent Challenges

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 wheelchair 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 wheelchair
- Not make any additional charge for doing so
- If the passenger chooses to sit in a passenger seat to carry the wheelchair
- 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 two 2022 Acts make small but significant changes. The 2022 Acts are the "Taxis and Private Hire Vehicles (Safeguarding and Road Safety Act) (31 March 2022)" and the "Taxis and Private Hire Vehicles (Disabled Persons) (28 June 2022)".

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

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

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

The 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 2020 survey was concluded just as the pandemic took hold in the UK leading to a full lockdown starting on 24 March 2020. Various impacts occurred on the licensed vehicle trade with many second order impacts only now beginning to dissipate. In some cases, such as need for more education contracts pulling on licensed vehicles, or changes to driver focus on life-work balance, impacts are ongoing, whereas in other cases, such as activity of the public at ranks, operations have effectively returned to normal.

The timing of the latest survey saw no formal restrictions remaining in place such that the overall situation of demand should realistically be relatively similar in background terms.

2 Local background and context

Key dates for this report title for Kirklees Council are:

- appointed Licensed Vehicle Surveys and Assessment (LVSA) on 20th February 2023 accordance with our proposal of January 2023
- as confirmed during the inception meeting for the survey held on 28th February 2023
- this survey was carried out between February and June 2023
- On street pedestrian survey work occurred in late-April 2023 (on a Tuesday (46%), Thursday (20%) and Friday (34%))
- the video rank observations occurred in mid-March 2023 (with some repeats due to snow on the first weekend)
- Licensed vehicle driver opinions and operating practices were canvassed using an electronically available and emailed out survey during March to May 2020
- Key stakeholders were consulted later in July
- A draft of this Final Report was reviewed by the client during Autumn 2023
- and reported to the appropriate Council committee following acceptance by the client.

The authority had a current population of 433,300 at the time of the 2021 census (lower than the 443,790 using the 2020 estimates available from the 2011 census, 2016 revision at the time of the 2020 survey). 81% (same as in 2020) of this are estimated to be aged 15 or over and the target population for on-street interviews.

Kirklees Council is a metropolitan borough 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. This document has not changed since the last survey in 2020. 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"

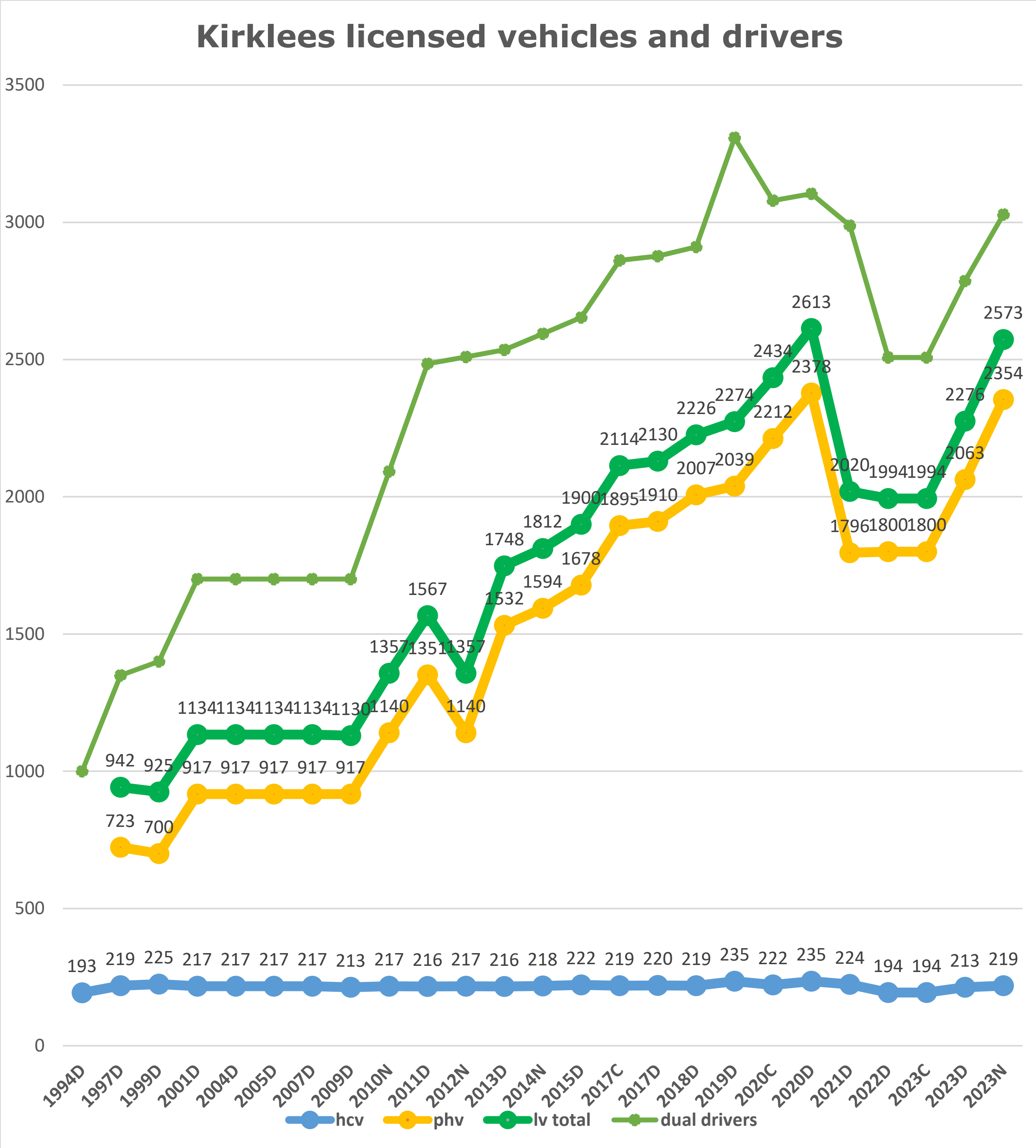
Item A6 encourages a simple through ticketing system for bus, rail and taxi.

The current Local Plan document, which is about to see review in Autumn 2023, 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 2017 survey. 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 that was undertaken 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 and WAV proportion 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 seen up to the last survey was badly hit by the pandemic. The fleet reached its lowest point in the 2022 DfT survey numbers. This is in comparison to the limited number of hackney carriage vehicles who have seen their numbers remain similar since around 1997.

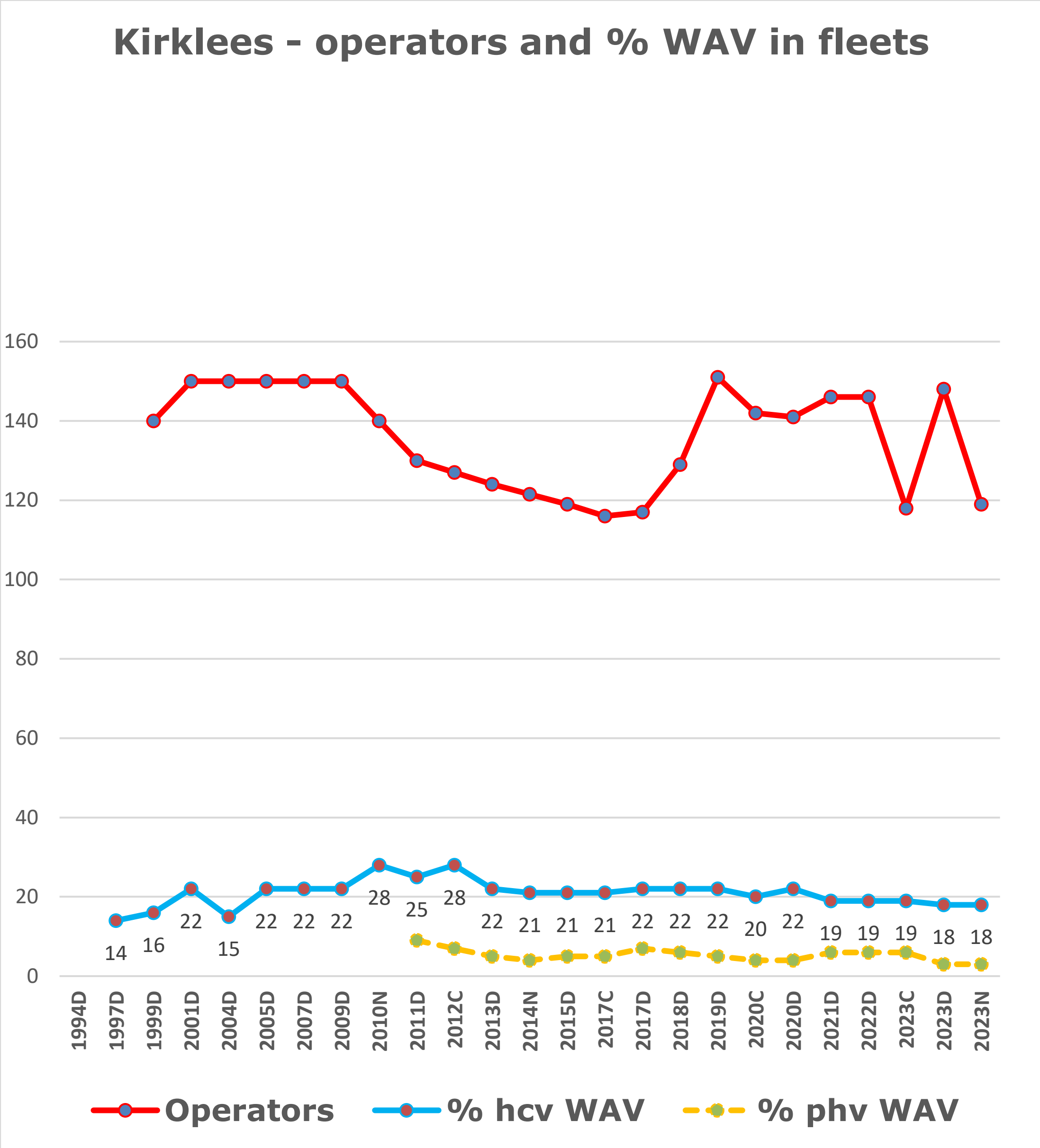
However, the formal statistics show a growth to 235 in the DfT 2019 statistics which had reduced to 222 in the actual active plates at the time of the previous demand survey rank observations in mid-March 2020. The pandemic reduced numbers more slowly than the impact on private hire, with a low of 194 plates. By the time of the survey, numbers were 205, with 213 by the time of the DfT formal survey a short time later and 219 at the time of finalisation of this report.

The actual limit in 2005 was recorded as 224 vehicles in the conclusions of the survey of that date. This was reiterated at the 17th December 2020 meeting following the previous survey. That means there remain some hackney carriage vehicle licences not taken up. In classic terms this implies there is no unmet demand that is significant enough for people to invest in adding vehicles to meet the demand, but there are times we have found unmet demand even with plates available given that it is not only passenger demand that drives the decision to take on commitment of a vehicle.

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 same as at the time of the previous survey. However, during the pandemic the levels did increase to 11% when more private hire vehicles were lost. The DfT 2022 low value for private hire was 76% of the 2020 DfT value whilst that for hackney carriages was 83%. The difference at time of survey was 87% of the hackney carriage fleet level and 83% of the private hire level pre-pandemic. That level was actually the peak of numbers both hackney carriage and private hire, and mirrored the national picture that saw the year pre-pandemic having the highest levels of vehicles and drivers generally since recording numbers began in 1997.

The dual driver licence numbers also dipped to around 2,500 minimum, rising back more recently but still some way from the previous peak of well over 3,300, although the most recent numbers show them once again over 3,000 and still climbing. This shows the trade in Kirklees has bounced back and continues to do so.

Information is also available from these sources to show how the level of wheelchair 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 wheelchair 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 generally climbed steadily from the time of the last survey despite the pandemic, but were still not at the level reached in the early 2000's.

The level of wheelchair 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 although this has reduced since the last survey. The current hackney carriage WAV share is 18%, 2% lower than at the last survey. Their peak proportion was in 2010 and 2012 at 28% with the national trend of the pandemic taking out quite a few also evidenced here.

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) and this number was re-confirmed in December 2020 after the previous survey.

Kirklees undertakes regular review of its policy to limit hackney carriage vehicle numbers in line with the BPG. The previous surveys were in 2020, 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 2017 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 which has evidential backing as quoted above). There remain spare plates available.

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).

For this survey the additional rank near Barclays in Holmfirth was identified and observed, as was the rank in the turning circle at Dewsbury Station. Further, the layout of the rank at Huddersfield Bus Station has been modified. In 2020, the Bus Station rank had two parallel lanes and was directly outside the bus station exit. There was a further rank at the far end of Dundas Street which operated separately. In 2023, there is a smaller rank slightly further back near the Bus Station exit, but the main element of the rank is on Dundas Street but at the end near the Bus Station. The other rank remains in place at the far end of Dundas Street at its junction with Market Street.

Rank observation background

The full programme of rank observations was interrupted by snow on the first set of observations, although impact varied across the area. Further, there were no train services due to strike action on the second Saturday, nor on any late evenings during the survey period due to long-term maintenance works. On this basis, observations for Huddersfield Station were taken from the first weekend (with apparently less impact there than in other locations), with Holmfirth and other non-Huddersfield locations principally covered on the second weekend. John William Street was observed for both weekends to allow some comparison. We believe a robust set of observations were still obtained in the circumstances. A rank on the frontage of Dewsbury Station was identified and added to this set of observations.

Overview of rank observations

Although the detailed hours observed were focussed, they covered mainly periods when the ranks were active. For lighter used ranks, these hours were identified by quick-watch of the full videos to highlight hours to be watched in detail. This means in essence that the observations are a full set of operations for the period covered, although some of the smaller ranks were not covered on all day.

A total of 395 (421 last survey, 350 in 2017) hours of rank observation were included in the detailed assessment of demand across the area. These observations produced 15,294 (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, 11,233 (10,411, 10,531) related to vehicle arrivals or departures (remarkably similar levels between years). The range by site was between 67% and 83% of activities being vehicle arrivals or departures.

There were some 148 observed departures of pedestrian groups from the rank locations on foot. These saw 194 potential passengers leave in this manner, with 45% of the total being at John William Street, 17% at Huddersfield Railway Station 14% at Victoria Street, Holmfirth, 9% at Cross Church Street and 4% or less at all other locations.

Of all the observed vehicle arrivals and departures, 63% (71%, 2020, 78% 2017) were observed as local hackney carriage movements. The next highest proportion, 20% (14%) were private cars, 12% (10%) were private hire vehicles, 2.1% (4%) emergency vehicles and 1.6% (1%) goods vehicles. 1.4% (none last time) out of town taxi style vehicles were recorded. The increase in seeing private cars using ranks is a national phenomenon since the pandemic, a time when those in cars got used to using lesser-used ranks.

In terms of overall activities recorded, 41% (23%) of the total were at John William Street, Huddersfield, 19% (26%) of the total were at the Huddersfield Station rank, 8% (9%) at Victoria Street Holmfirth, 8% (9%) at the two ranks for Huddersfield Bus Station, 6% at Dewsbury Station (added this time) and 5% (8%) for Huddersfield Cross Church Street. This means the top two ranks accounted for 60% (half in 2020) of the overall activity. Some of the reduced level at the Station related to there being no late night trains on any of the three evenings covered, due to long term planned engineering that would have been hard to avoid.

When considering only hackney carriage activity in terms of total movements, John William Street 40% (23%), Huddersfield Station provided 26% (34%), Holmfirth Victoria Street 10% (same as last time) and Huddersfield Bus Station 8% (11%). Dundas Street at Market Street was next with 5% (7%) of hackney carriage movements. No other site gained more than 3% of observations.

For this survey, the highest level of usage by private cars was at Holmfirth Bus Station where 52% of vehicle movements were cars; next was Cross Church Street Huddersfield, then South Street Dewsbury with 46% and Dewsbury Station with 44%. All are areas with high demand for pick up and set down by private vehicles as well as being designated ranks, the first two being part time locations which never helps with issues of people understanding when the rank is legally available for other vehicles. Other rank use by private cars ranged from 21% of movements to 2%, with Huddersfield station rank seeing the least other vehicle usage (2% this time, 1% in 2020). The latter rank has a more protected design.

The worst level of private hire pick-ups at a rank were different this time. Worst for this survey was the newly observed rank at Dewsbury Station (42%), then Holmfirth Bus Station with 31%, the revised rank at Upperhead Row, near the Bus Station in Huddersfield with 23%, then Cross Church St, 18% and John William Street with 36% of vehicles being identified as local private hire. All of these are located at points of high demand for all kinds of pick-ups and set-downs so very vulnerable to issues. Dundas Street at the Bus Station rank saw 11%. Last surveys top scorer, Holmfirth Bus Station, this time saw 31% of vehicles being private hire, as noted in 2020 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. Again, there is high demand for all kinds of people to be set down at this location.

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 previous surveys.

Rank	2023		2020		2017		2013	
	Flow	%	Flow	%	Flow	%	Flow	%
Railway Station	2,335	29	2,928	32	3,025	29	2,489	27
John William St	1,970	25	1,783	19	2,358	23	1,441	14
Victoria St, Holmfirth	1,386	17	1,312	14.1	898	9	402	4
Dundas St at BS	644	8						
Upperhead Row at BS	254	3	1,041	11.2	995	10	636	7
Dundas St at Mkt St	493	6	549	5.9	449	4	636	7
Market Place, Birstall	234	3	210	2.3	540	5	548	6
South St, Dewsbury	230	3	310	3.3	255	2	727	8
Cross Church St	194	2.5	772	8.3	652	6	924	10
Barclays, Holmfirth	157	2						
Dewsbury Station	80	1						
Bus Station, Holmfirth	53	0.5	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	***8,958***		***9,271***		***10,447***		***9,426***	
Growth since previous	***-3%***		***-11%***		***+13%***			
Growth since 2017	***-14%***							
Growth since 2013	***-5%***		***-2%***					

Overall estimated weekly passenger numbers are only marginally reduced from 2020, seeing about a 3% reduction overall. Flows are down around 5% from 2013, but 14% down from the peak recorded in 2017. These are against national trends that have seen much larger reductions in most places.

The table shows that the top two ranks in the area remain that at the Station and in John William Street, both in Huddersfield. In 2023, these two now provide 54% of all estimated passengers, up from 51% last time.

Actual use and share of the station rank have marginally reduced, though this may reflect the reduced night service in this survey due to long term rail engineering that could not be avoided. However, the share is about the same as in the 2017 survey and still higher than the share in 2013.

Levels at John William Street were up in actual terms and in share. This rank is now seeing the most use in any survey for which we have information.

Use of the night rank at Victoria Street in Holmfirth continues to grow – for yet another survey. This rank retains its third busiest in passenger terms status and has grown in both numbers and share since consistently. It now has 17% of total passenger demand, particularly high considering the relatively limited hours of operation. This is supplemented by a further 0.5% of total demand at the Bus Station rank there, plus a further 2% at a feeder rank to Victoria Street previously not included near Barclays. The night Holmfirth operation therefore this survey provides just under a fifth of total passenger demand – a good news story for the economy there and the trade, although more difficult to service well given the distances and short periods of operation.

Taking both ranks near the Bus Station together, flows are relatively similar in share although down in actual numbers.

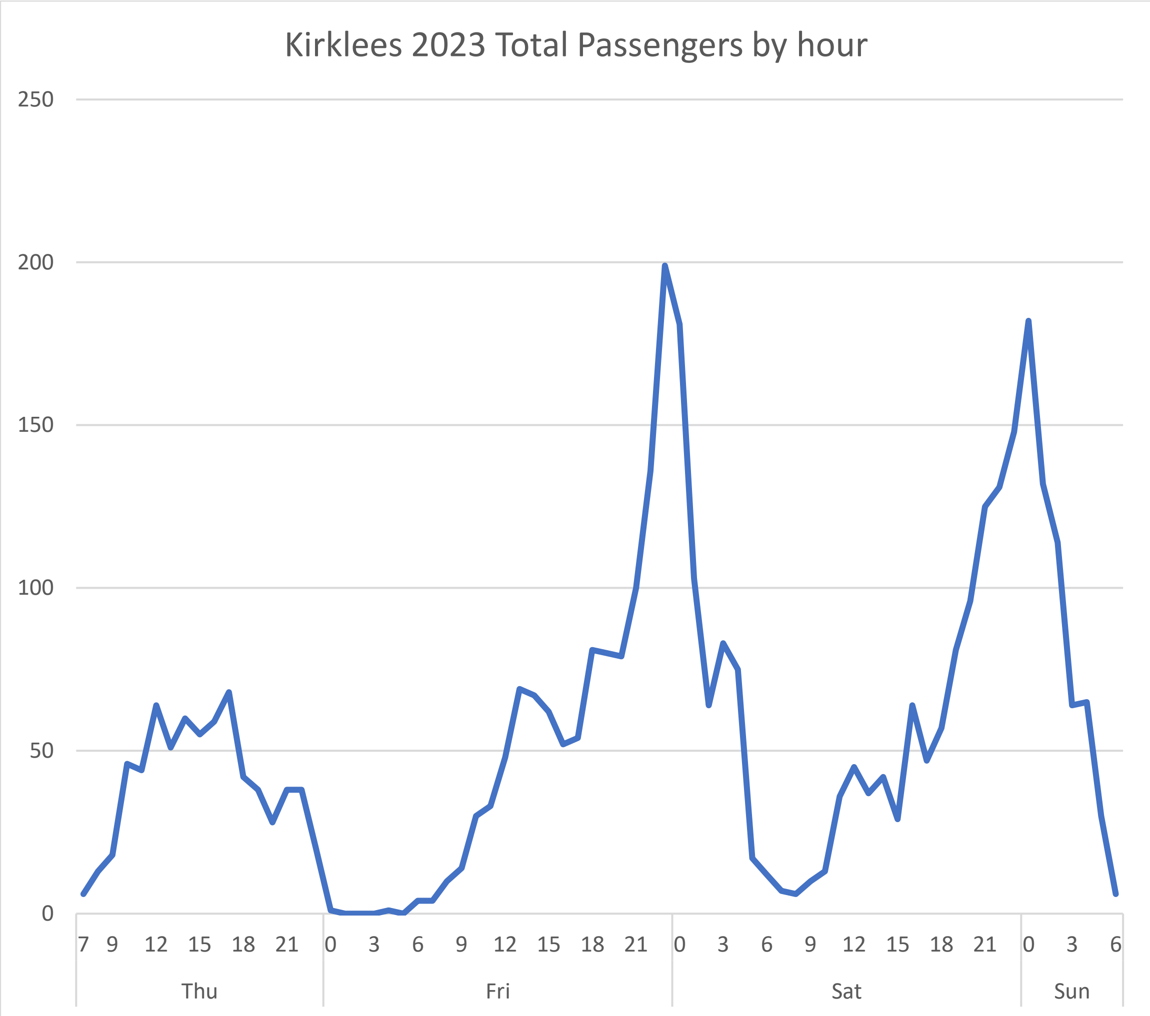
The above top five ranks are the only ones with over 6% of passenger demand at this time. This is a similar pattern to 2017, although they now take 82% of all passengers compared to 71% in 2017, suggesting a focus of rank-based demand increasing at these sites. This is a typical national trend with drivers focussing work on where they can get most remuneration.

Dundas Street at Market Street has retained share but lost in actual numbers a little. Market Place, Birstall saw some increase in numbers and share, but not making up for the 5/6% it saw in 2017 and 2013.

South Street, Dewsbury retained share but lost in actual passenger numbers, whilst Cross Church Street saw a large decline in both passenger numbers and share.

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 2023 with agreement of the Council, with several others added since 2020.

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:

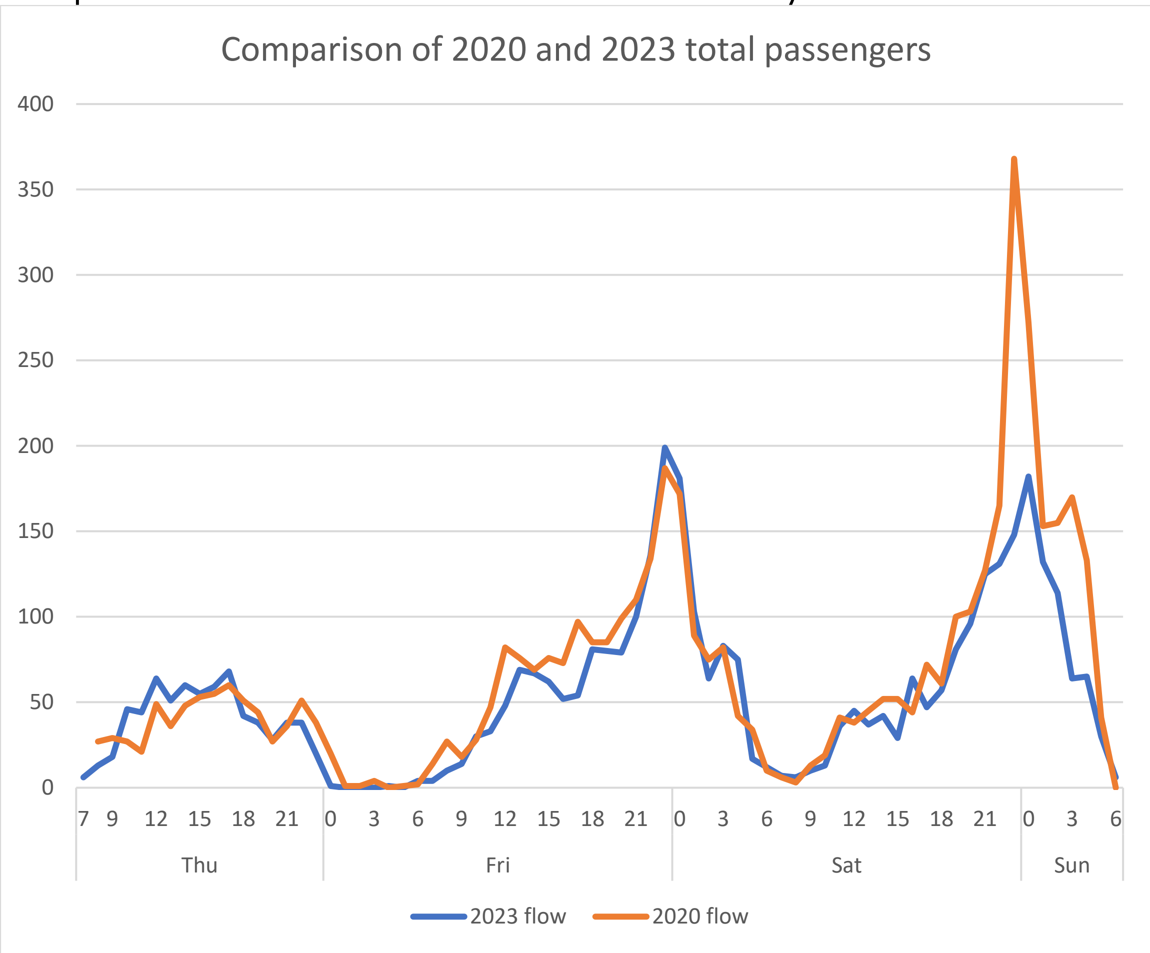


As is typical in most places, demand in total rises from Thursday to Friday to Saturday. There is very little hackney carriage rank demand through the early morning of Friday. Flows on Fridays tend to be higher than Thursday, with a peak at late night, and flows right through to Saturday. On the Saturday, 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. This profile is very similar to 2020 (further comparison is shown below).

The peak flow was just under four (nearly six times in 2020) the average hourly passenger flow of some 54 (67 in 2020) passengers. The peak for this Survey was 23:00 on the Friday, with the second highest flow in the Saturday midnight hour. This is a change from 2020.

Average Thursday hourly flows were 29, 69 on Friday and 65 on Saturday (all for the period from 06:00 on each day to 05:59 the next day).

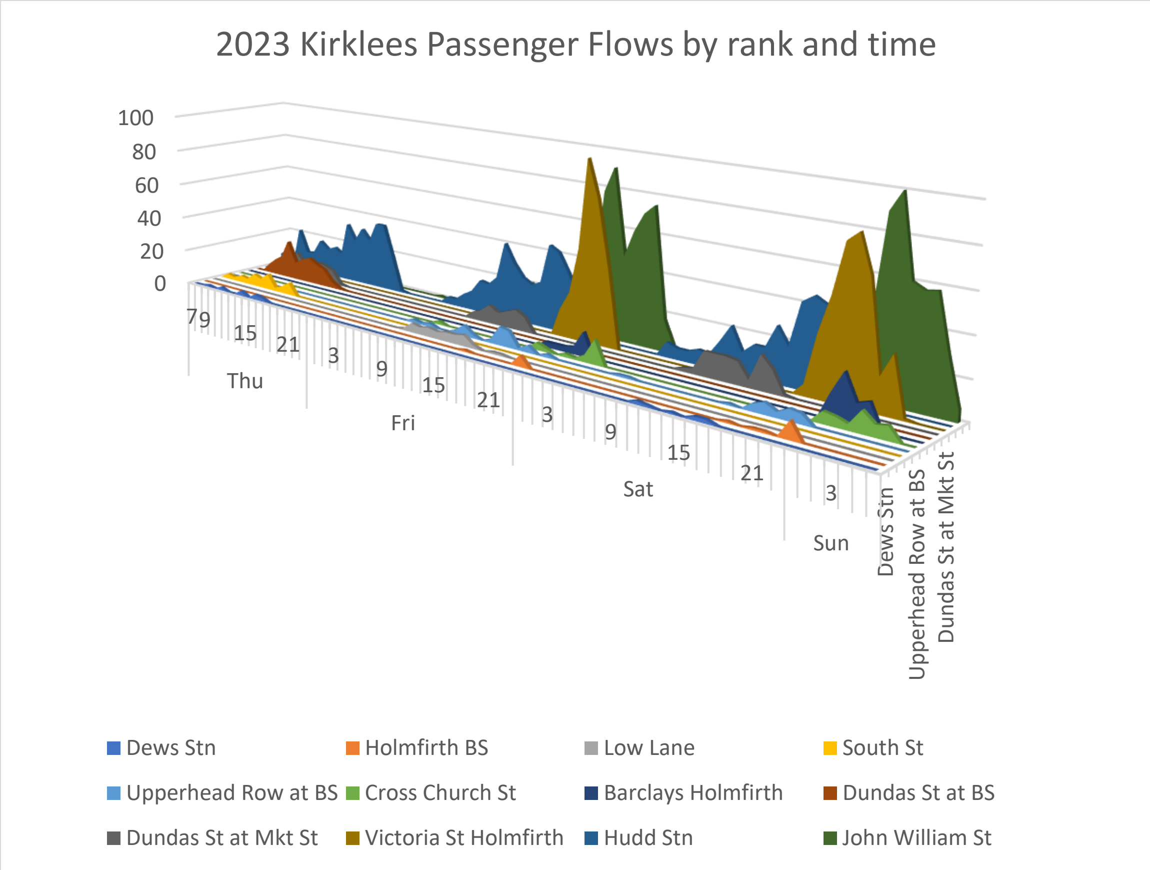
Comparison was also made to 2020 total flows by hour:



This shows a broad similarity between 2020 and 2023 hourly total passenger flows. Thursday weekday flows were higher in 2023, but evening flows lower. Friday flows appear very similar, as do Saturday, but in the last case, the peak on the Saturday is much lower now than in 2020. The profiles are however remarkably similar.

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 – albeit less than in 2020 (due to the engineering work impact noted earlier). John William Street rank seems to provide its main impact now at night. The most notable demand is that for Holmfirth, particularly at Victoria Street.

Despite its small size, the Dundas Street rank at Market Street provide daytime flows on all three days. 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 (same as in 2020). A further 6% (4%) had average passenger delays that were under a minute.

The longest passenger delay observed was just two minutes (12 in 2020) minutes. There were only two (four) passengers who experienced delays of 11 or 12 minutes. Just five (13), or 0.1% (0.3%) of the total of all passengers, had delays of six to ten minutes. 3.8% (2%) had delays between one and five minutes. Over all passengers, the study average passenger delay was just six (five in 2020) seconds, very small.

Of the seven (eight, 2020) hours when average passenger delay was a minute or more, three were at Huddersfield Railway Station with the others at four different ranks. Two were at times of low flow. There was only lower level issues at Holmfirth this time, compared to the issues observed in 2020 there.

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 (Friday 17th March, 2023)(the Saturday was covered in 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.

722 (581) different vehicle movements were observed across the 20 sample hours of survey. 60% (81% 2020) of the movements observed were identified to be valid local hackney carriages. 28% (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. There were no obvious out of town vehicles although this was more difficult to prove in Kirklees due to the large range of potential correct fleet numbers particularly for the large private hire fleet.

For the hackney carriage observations, 59% (58% in 2020 and 62% in 2017) of the current fleet was observed.

The highest share of the hackney carriage fleet observed was 24% (16% 2020) of all plates at John William Street, followed by 22% (24% in 2020 and 25% 2017) at Huddersfield Station in the later observation period there. Over the three periods covered at the Station, 39% of the total fleet was observed.

This does suggest a similar level of activity between 2023 and 2020 by plates, remarkable given the changes since that time. This may also help explain the stability in unmet demand levels and in overall patronage compared to other places.

Observed usage for those with disabilities

From the detailed rank observations, 27% (30% 2020, 25% 2017) of the observed hackney carriage vehicles appeared to be wheelchair accessible style vehicles. When considered by total vehicle movements by hackney carriage, 34% (69%) were WAV style at John William Street, 40% (63%) at Cross Church Street, 14-20% (52%) at the Bus Station, 15% (50%) Dundas Street at Market Street and 29% (38%) at Huddersfield station. There were very few WAV apparently active in the smaller centres, apart from at Holmfirth Bus Station which saw 61% (a third in 2020) of the hackney carriages apparently WAV style.

There were five (seven in 2020 and 2 in 2017) people observed accessing ranks in wheelchairs during this survey. The largest number, three, were at Huddersfield station rank (same as in 2020), followed by two at John William Street.

There were 22 (58 2020, 6 2017) people observed to have some other form of disability, not a wheelchair. 6 (23) of these were at Dundas Street at Market Street, 5 (16) at Huddersfield Bus Station, 1 (7) at Huddersfield rail station, and 9 (6) at John William Street.

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 Thursday and Friday (Birstall, Dewsbury and Batley)(corporately referred to as Dewsbury below), Tuesday (Huddersfield) and Friday (Holmfirth, between 20:00 and 22:40) in late March 2023.

The general nature of those interviewed was checked against the 2021 estimates from the new 2021 census. For the full area, males were underrepresented by just 1%, the lower and mid age groups were over-represented by 7% and 8% respectively whilst the older group of age was under-estimated by 15%.

86% said they lived in the area. 19 postcode areas were given for those not from the area with most from surrounding areas.

Almost all those interviewed told us their use of licensed vehicles in this area in the last three months. Across the area, 80% (71% last time and 68% in 2017) had used a local licensed vehicle in the last three months.

61% said they had used private hire only, 12% both kinds of vehicles and 7% hackney carriage only.

Taking actual usage and transforming this to average monthly usage suggests an average of 1.9 (2.4 last time and 2.3 in 2017) across the full sample – a reduction but not significant.

22% said once or twice a month whilst 20% said once or twice a week. 18% however, said they never used them and 16% only once or twice a year.

People then told us how they normally obtained licensed vehicles. 81% gave at least one reason, with 79% of Dewsbury and 64% of Holmfirth interviewees responding. 39% provided multiple responses. 1% said they used all five quoted methods (as in 2020), 1% (4%) gave four, 6% (7%) three, 31% (30%) two and the remaining 61% (58%) just named one single main method.

On average, 45% (half in 2020) of those responses were that people got licensed vehicles by phoning. 18% (22%, 15% 2017) said ranks, 5% (4%, 0% 2017) hailing, 5% (10%, 3% 2017) freephone and 20% (13%) an app. Interestingly, hailing seems to be increasing, rank staying around the same, but with the main increase being apps taking from freephone and phone. This suggests a tip towards people being keen to get vehicles more immediately.

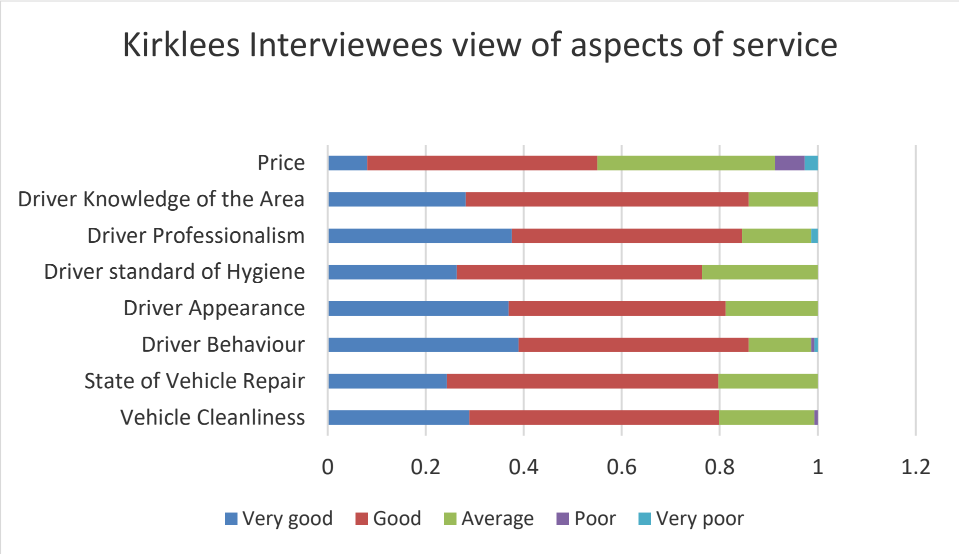
When people were asked the level of use of hackney carriages, 72% across the area (48% in 2020 and 61% in 2017) could not remember when they had last used a hackney carriage. This suggests reduced usage of hackney carriages.

Just 3% could not remember seeing a hackney carriage in the area.
The resulting usage per month was relatively low – 0.2 trips per person per month compared to 0.6 overall in 2020 and 0.3 in 2017.
When compared to total licensed vehicle trips, 11% are made by hackney carriage compared to the 18% from ranks and 5% from hailing quoted previously, in the same order of magnitude.
People told us the companies they phoned for licensed vehicles. 56% of people gave a response. Of these, 8% named three, 35% two and 57% one company. In total there were some 168 mentions of names. There were 22 different names given, but nine of these only gained one mention each and another three gained two, and three more three, and one other four. This left the top six companies taking 83% of all mentions.
The largest overall company took 27% of mentions. The next largest saw slightly fewer mentions at 26%, the third saw 14%, the fourth 8% and fifth and sixth just 4% each. Though this suggests high numbers of companies used, the bulk of work appears to be focussed on the top three.
The two largest companies also used apps. The national app took 77% of mentions, but of the quarter of respondents saying they used an app, 12% (split equally) said they used a local and a national. One local app saw 10% of those using apps and the other 4% (in both cases this was sole use of that app).

People were asked about use of ranks. For the full sample, 60% (57% last time) of interviewees named at least one rank. 1% knew of 10, 10% nine, 3% five, 10% four, 18% (30% last time) named three, 45% (27%) two and 13% (43%) just one. This suggests good knowledge of ranks overall.
Across the area, the station obtained 24% (27% last time and 14% 2017) of all mentions, followed by the Bus Station (19%), John William Street with 6% (16%, 14%), Wards Hill Batley with 12% and Dewsbury Rail station with 11%. Victoria Street Holmfirth gained 8% and its bus station 7%.
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.
Overall, 73% of those responding that they knew a rank said in fact they did not use it. This ranged from 87% at the Bus Station, 85% at Huddersfield Station and 81% for John Williams Street to Victoria Street Holmfirth where 32% did not use this, but the remainder said they did. Half

those aware of the bus station rank in Holmfirth said they used it, with 74% not using Dewsbury bus station and a two thirds not using the rail station rank. 79% knew of Wards Hill Batley but did not use it.

People were asked their views about the service provided. 64% gave us views. The results are shown below:



As is usual, price tends to score worst but even for that there was a 7% very good score, but 2% said very poor. There were no other very poor scores but most factors scored some 'poor'. Best score was for driver knowledge where 44% said good and 31% average with no poor or very poor scores at all. Next highest was vehicle cleanliness, then state of vehicle repair and driver behaviour. Overall, this suggests a generally average view of the service provided by all licensed vehicles in the area.

When asked what might encourage people to use hackney carriages or to use them more often, the strongest response came for 'if they were more affordable', with 36% of total responses, followed by 26% if people could pay electronically and 21% were there more hackney carriages that could be phoned for. None said more hackney carriages they could get at a rank.

In terms of need of adapted licensed vehicles, overall 86% said they did not nor did they know anyone needing adapted vehicles. 10% favoured WAV and 5% other adapted styles.

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).

13 said they had given up waiting for hackney carriages, but when inspected only two of these related to rank issues in Kirklees. That provides a latent demand factor of 1%. This is less that the 9% of last time or the 0.5% of 2017.

People were asked if they felt there were enough hackney carriages in the Kirklees area. 93% felt there were, with the remainder not knowing.
85% felt they knew the difference between a Kirklees hackney carriage and a private hire vehicle. People were then asked to confirm various statements, the correct answers being provided by licensing as:
"White coloured vehicles can be either HCV or PHV in Kirklees"
Responses came back with all but one person suggesting only HCV would be white.
Roof sign saying taxi – yes for HCV no for PHV
Response was 100% from all that only HCV could have roof signs.
Door sticker giving company name – both have door stickers but it would be no for HCV and yes for PHV (although under deregulation act HCV can work for PH operators and could therefore have an operator door sign)
Response was that 10% said could be HCV only, 35% said it could be true for both and 54% that it was private hire only, as expected
Hail one it would be yes for HCV and no for PHV
90% responded correctly, hcv only, but 4% thought phv could be hailed and 6% thought both could be.
Phone and book one can be yes for both but it is a requirement by law to prebook PHV
97% said this was only true for a phv with 2% saying both and 1% hcv only.
I can get one using an app I'd say could be yes for both but again the pre-booking legal requirement for PHV"
98% said this was true for phv only, with 2% for both and 1% for hcv.
In general this suggests people are well able to distinguish vehicles with only small levels of incorrect knowledge, although it is clear hackney carriages are perhaps missing potential to be booked or use apps.

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 email. 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.

As is typical for this kind of consultation, which is entirely voluntary, just a single response was received. They told us their customers used licensed vehicles, mainly using their own mobile phones. They were not aware of any ranks customers could use and received no complaints. This was from a Bingo club.

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.

The authority has 15 rail stations. The largest is Huddersfield, operated by the Government owned Trans Pennine Trains Ltd (since it replaced the former private company in 2023) is 106th (104th in 2020) largest in terms of the volumes of people entering and leaving up to March 2022 (the latest year for which statistics are available). In that year there were just over 3.04 (under 4.9 million in 2020) passenger entries and exits. Passenger numbers have gone up 81% since the start of collection of data in 1997/8, but the years since the last survey, over the pandemic, have seen flows down 36%.

The next largest station is Dewsbury, which was 351st (365th) with just over a million (1.7m, 2020) passenger entries and exits. Growth was similar with 96% since the start of information and -35% since the last survey. All other stations are operated by Northern (also Government controlled) and have annual passenger numbers ranging from just under 323,000 (871st, was 955th, Mirfield) to just under 20,000 (2,165th, was 2,225th out of 2,630 stations), with recent growth of -6% and no growth since statistics began. Eight stations had less than 53,000 passengers per year, or 530 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 issued towards the end of March 2023.

Just 41 (132 last time) responses were received. This is around a 1.5% (6% last survey) response rate from the entire driving population, a poor 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 remans a better response that that in 2017, which was just 11 and only considered as indicative, but obviously not as robust as the 2020.

80% of those responding said the licensed vehicle trade was their main or only source of income. 12% said they were working part time but with no other sources of income. 7% were part time but with other sources of income. No respondents said they were not currently working.

Of the response, 83% (69% last survey, 64% 2017) said they drove private hire vehicles, 10% (22%) hackney carriage, 7% (3%) said they drove either vehicle and none (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. This appears to be a typical response for this area given the high levels over the last three surveys.

For all respondents, the average quoted level of service in the trade in the area was 11 years (showing a continued reduction from the 13 of 2017 and the 12 of 2020). However, the hackney carriage sample had a much higher average of 25 years with the private hire lower at 10 years. The longest level of service of 40 years was higher than the level of 30 years quoted by those from the private hire side. However, the hackney carriage sample was just four. In terms of overall spread, 34% said between one and five years, 29% six to ten and 12% 11-15 years. Just 6% responded 26 or more years.

All but one (86% last time) told us how many days they had worked in the period around the rank surveys. 43% (33% last time) said five days, 35% (33% last time) six days, 13% (11%) said seven days, 8% (10%) four days, 3% (5%) three days, and none (3% each) two or no days, and none (1%) said a single day. The level of hackney carriage response was too low to compare and contrast their working profile with private hire.

The average days worked was 5.5. The value was marginally higher for private hire compared to hackney carriage, although again the small hackney carriage numbers suggest this can only be noted as indicative.

Average hours worked were 36.2 (similar to the 35 of 2022 and the 31 quoted in 2017), with a value slightly higher for hackney carriage only at 38.8. The quoted longest hours worked for hackney carriage was 45 (70) hours compared to 70 (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 31% (25% last time) for family commitments. 22% (19%) said they worked busy times, but 17% said their hours were chosen to avoid disruptive passengers (same as in 2020). 21% this time avoided heavy traffic (not mentioned in 2020). This is a significant increase from the none saying this in 2020. 1% (10%) had their hours affected by sharing a vehicle.

98% (79% in 2020) said they owned their own vehicle and 8% (13%) said that someone else also drove the vehicle they drove. Times vehicles were used by others were equally split between weeks and weekends.

85% (55% in 2020) overall of all those responding (including those who said they drove both kinds of vehicle) said they accepted pre-bookings. 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 (14%) through use of apps (31%) and via companies (49%). The hackney carriage responses had two that made the booking direct with the driver asking for a return trip. One of the four hackney carriages said they got bookings through a company. Two of the four said they mainly obtained work from immediate hire from ranks and then confirmed this was 90-95% of their work. One obtained the other 5% from phone bookings, the other gained their final 10% from hailing. One said 75% rank, 5% hailing and 20% bookings. Two confirmed they undertook immediate work either from ranks or bookings.

Only three of the four hackney carriages, and none of those saying they drove both kinds of vehicle, gave ranks they used. One said South Street Dewbury plus Batley. One said most Huddersfield ranks and Victoria Street, Holmfirth plus two smaller town centres. One said just Huddersfield Station and another Huddersfield Station and South Street Dewsbury.

Several private hire suggested ranks they used, but this appeared to be a misunderstanding as none then gave any proportion for how much of their work came from ranks, generally confirming most work was from office bookings.

With reference to usage of vehicles by those in wheelchairs, 54% to 87% said they never obtained any such passengers. However, 10% said they got such fares daily at ranks and a further 10% daily through bookings. 15% got daily pre-bookings and 13% got contracts needing a WAV. Otherwise, there was little usage quoted nor for people transferring.

When asked if there were enough hackney carriages now in Kirklees, 78% said yes and 22% said no. All four hackney carriages and all three dual users felt there were enough. 73% of the private hire also agreed there were enough.

Drivers were asked if the number of hackney carriages should continue to be limited. 62% (74% in 2020) said yes. Again all four hackney carriages responding agreed, with two of the three dual users also agreeing. 56% of private hire also agreed, a slight reduction from the 62% of 2020.

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.

When asked how the limit benefitted the public the four hackney carriages basically reiterated there were already enough vehicles and that more would cause issues with them making ends meet. Private hire drivers in favour also reiterated there being too many vehicles, with some pointing out there were also too many private hire, many from out of town areas. Some of those that said the limit should not remain also had doubts if removing it was a good idea. Few gave any indication of benefits of either keeping or removing the limit.

The question of benefits were the limit removed saw five say it would provide more choice and one that people would be better able to use licensed vehicles. Two used this question to say they thought there would be no benefit of removing the limit whilst all hackney carriages used the question to reiterate there would be no benefit and that there remained too many hackney carriage vehicles in any event.

Additional comments amounted to one hackney carriage seeking better enforcement of ranks against private cars parking in them, one person saying they had been waiting for a hackney carriage plate for 16-17 years and were unwilling to buy one for £15k, another that said all licensed vehicles should be hackney carriages and another saying hackney carriages were ‘something of the past’.

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	2023	2020	2017	2013
Average passenger delay	0.1	0.08	0.017	0.87
Prop travelling in hours with over 1 min APD	2.43	1.88	0.06	Zero
Off peak hours with any delay	7.48	10.10	10.26	12.12
Seasonality	1	1	1	1
Peakiness	1	0.5	0.5	1.0
Latent	1.01	1.115	1.005	1.003
Overall ISUD index estimate	1.81	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 in 2020 and 1.81now. 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 and the proportion of passengers travelling in hours with over a minute average passenger delay

have both increased. Off peak hours with delay have reduced more significantly and peakiness has been set back to 1 (not peaky) whilst all other factors have remained the same. 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 February and June 2023 over a similar timeframe to the previous work in both 2017 and 2020. On street interviews and rank observations were undertaken in late April. Licensed vehicle driver and other trade opinions were obtained between March and May.

Local council policy towards transport remains 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. This policy has been consistent since the last survey.

Private hire vehicle numbers continue to show strong growth whilst the level of hackney carriages has remained stable with the limit policy. Hackney carriages remain 9% of the fleet compared to being 24% in 1999. Dual driver numbers remain generally growing. The pandemic had a strong impact on all elements of the service although hackney carriage numbers, with the limit, were much less badly impacted. At the time of writing this report, all numbers were heading back towards the peak levels immediately before the pandemic, which shows a very resilient trade that has bounced back very well and relatively quickly.

Operator numbers are more stable although recent numbers suggest volatility or recording errors.

WAV fleet share of the total in both fleets continue to decline but only marginally so.

This current survey is the latest in a series believed to cover at least 2005, 2010, 2013, 2017 and 2020 together with this 2023 survey. The formal level of the limit remains at 224 with some therefore available for issue.

Rank observations

Since 2020 the layout of the rank provision at Huddersfield Bus Station has been amended. The former two parallel lanes directly outside have been replaced by a smaller feeder rank near the bus station exit with the head of the rank located at the bus station end of Dundas Street. The rank at the Market Street end of Dundas Street remains. Further, a feeder rank was identified near Barclays Bank in Holmfirth together with a rank in the drop-off circle of Dewsbury Station.

There were some impacts of snow on the observations with some repeats the following week. Rail services were impacted by long term overnight maintenance work and the repeat weekend saw a national rail strike but the principal rail ranks had already been covered without snow impact in the initial observations.

63% (71% last time) of the observations at or near ranks related to local hackney carriage movements, with 20% (14%) being private cars and 12% (10%) private hire vehicles. This follows the national trend seeing more abuse of ranks by cars that have got used to less hackney carriages being around and more rank space being available near key locations where people wish to stop.

This time 1.4% of the total vehicle observations were out of town licensed vehicles whereas none had been observed in 2020. This is tiny compared to other places.

For this survey, 60% of overall vehicle activity was near either John William Street or the Huddersfield Station rank, increased from the half of the total in 2020. This time 41% (26% last time) were at John William Street and 19% (26%) at the Station.

With reference to hackney carriage vehicles, 40% (23%) were at John William Street, 26% at the station (34% last time), 10% at Victoria Street Holmfirth (same as in 2020), Huddersfield Bus Station 8% (11%) and Dundas Street at Market Street 5% (7%). Whilst other sites were used, none saw more than 3% of the hackney carriage observations.

The worst level of potential misuse by private vehicles was at four ranks located where high demand for private vehicle pick up and set down was evident, with the top two being part time locations whose markings do not help differentiate the rank usage times (Holmfirth Bus Station and Cross Church Street, Huddersfield). Cars were between 52% and 44% of total movements.
Apparent private hire misuse of ranks saw five ranks with between 18% and 42% of movements made up of local private hire, much higher than in 2020. The worst location last time (Holmfirth Bus Station) was third this time, with John William Street second with 36%.

Compared to many other places around England, overall estimated weekly patronage levels are only marginally reduced from those observed in 2020, being around 3% less. This is still 14% less than the peak of 2017.

As already noted, the top two active rank locations are Huddersfield Railway Station and John William Street, Huddersfield. This survey they provided 54% of all estimated passengers, compared to 51% in 2020. Station share and usage was reduced but John William Street was the busiest it has been seen since the 2017 survey.

Holmfirth Victoria Street night rank saw continued growth remaining third busiest overall with just over 17% of total passengers estimated in a typical week. Levels in Holmfirth are also supplemented by the feeder and the bus station locations. The new arrangement at the bus station saw about the same share of passengers (11%) but Cross Church Street saw significant reduction from just over 8% last time to 2.5% now.

The top four ranks now provide 82% of all estimated passenger demand compared to 76% in 2020 and 71% in 2017. This continues to be at the expense of the lesser-used rank locations.

The demand profile continues to see growth from Thursday to Friday to Saturday, with the latter two days remaining most similar. However, Saturday sees a very sharp peak which defines the area as having 'peaky demand' although the level of this is reduced, having been six times the average hourly value in 2020 and just under four times now.

Specific comparison of the two total flow profiles shows remarkably similar profiles apart from the reduced Saturday peak.

The same level, 2%, as in 2020, of observed hours saw average passenger delay in that hour a minute or more. The longest average passenger delay was just two minutes, compared to the 12 in 2020. Just two specific passengers had actual waits of 11 or 12 minutes compared to the four that experienced this in 2020. Overall average passenger delay was increased from 2020, but only from five seconds to six, very minimal.

During sample observations, 59% (58% in 2020 and 62% in 2017) of the hackney carriage plates were seen. The top two rank saw most share of the fleet, with 39% of the fleet seen over the three Station observations. In general the overall level of activity was very similar to 2020, very encouraging and referenced further later in regard to performance of the service to the public.

There appeared to be a focus of WAV style vehicle servicing ranks, with a higher proportion seen than actually within the fleet. An similar level of five (seven in 2020) people were observed using wheelchairs to get hackney carriages at ranks in the area, with over 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, with 84% saying they were from the Borough.

On average, 80% (71% last time and 68% in 2017) had used a local licensed vehicle in the last three months. The average level of trips per person per month had reduced slightly overall since 2020/2017 (now 1.9 trips per person per month).

Across the area, 18% (22% 2020) got licensed vehicles from ranks, 20% (13%) used an app and 5% (4%) hailed. Standard phone reduced to 45% from 50%, showing the key item being growth of app usage. The increase in hailing is also notable which we are finding can be a result from people increasing use of apps.

An increased 72% could not remember when they last used a hackney carriage although this was more similar to the 61% of 2017 than the 48% of 2020. This could demonstrate that the issue of shortages of private hire in the pandemic may now being overcome. Just 3% however could not remember seeing a hackney carriage, a good level of awareness.

The overall per person per month usage of hackney carriages was much reduced at 0.2 compared to 0.6 in 2020 but again more similar to the 0.3 of 2017.

The top six companies phoned took 83% of all mentions with the largest 27%, second 26% and third 14%, with others 8% or less. The two largest companies also used apps seeing good competition for a national app.

The top known rank remained Huddersfield Station (24% (27%2020)) and then the Bus Station with 19%. John William Street quotation was reduced from 16% in 2020 to 6% now.

Views about the service provided suggested a generally average view of the overall service with the best score for driver knowledge and price worst, but not as negative as in many places. However, higher usage remained ‘if they were more affordable’.

The estimate of overall latent demand was 1.01.

93% felt there were enough hackney carriages in the area with the remainder saying they did not know. 85% felt they knew the difference between a local hackney carriage and private hire with detailed responses suggesting only a minority having misunderstandings. The key area where hackney carriages appear to be losing out is that people are not aware they can get them as bookings or with use of apps.

Key stakeholder views

Despite attempts being made, there was just a single response who said people used licensed vehicles but obtained them on their own mobile phones. 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.

Statistics for the local 15 rail stations found Huddersfield patronage down 36% since the last survey although its rank overall was marginally higher. Dewsbury was second and had similar levels of reduced patronage.

Trade views

The much poorer 1.5% (6% in 2020, but still better than in 2017) response, found most drivers tended to work five days and 36 (35 in 2020) hours. 17% - the same as in 2020 - said they chose working hours to avoid disruptive passengers, which had been a strong increase from no response saying this in 2017. Vehicle ownership levels were even higher than 2020 at 98% (79% 2020). 85% overall accepted pre-bookings.

Few responses were given about ranks used.

62% (74% in 2020) supported retention of the vehicle limit. This included 56% of responding 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 (as in 2020).

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 1.81 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. Off peak hours with delay reduced although the growth is inflated by the suggestion that the peakiness factor has changed from being peaky to not, which could be argued, in which case the current value would be 0.9.

In any event, public service is clearly being met by the present fleet and therefore the limit policy is providing benefit.

Synthesis

The current survey shows remarkable similarity in the operation of hackney carriages in Kirklees compared to the pre-pandemic situation observed in early 2020. Overall patronage is just 3% lower now. This is despite evidence of increased use of apps, which seems to have mainly impacted on phone usage of private hire, but also seems as in other places to have led to some increase in hailing.

The trend towards increased use of the larger ranks and reduction in numbers of other ranks used continues, although there are two ranks first observed this time that do provide good levels of passenger flow. Holmfirth continues to be an excellent area of hackney carriage usage albeit at weekends and at nights.

All the information continues to point 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.

During the pandemic, it kept many more hackney carriages on the road compared to the dire impact on private hire vehicle and driver numbers. However, as private hire numbers returned, some people returned to their use against otherwise having used hackney carriages.

The national issue of abuse of ranks by private vehicles is also notable here. This could increase unmet demand opportunity if vehicles cannot service ranks when they need to meet passenger demand.

Conclusions

The most important conclusion is that the level of observed unmet demand remains 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.

Whilst the level of unmet demand suggests the spare plates could be removed the recent take-up of some suggests on balance it is better to leave the few available to meet demand if needed.

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 remains 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 224 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 fleet of 219 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. However, on balance with recent take-up of some spare plates this option should not be taken at this time.

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 2026. This target should be retained. It should be noted that due to Ramadan in 2

Consideration should be given, however, to alerting relevant authorities to the issue of abuse of some ranks by private cars to ensure the ranks are always available to hackney carriages when needed to service customers. This may need much better signing at part time ranks.