

Eastbourne Borough Council

Study of Hackney Carriage Services

Final Report – August 2006

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1. INTRODUCTION

Terms of Reference

1.1 MCL were appointed by Eastbourne Borough Council in February 2006 to investigate the provision and use of taxi services in the Borough. We were specifically asked to assess:

- The overall demand for Hackney Carriage services in the Borough
- Periods or locations giving rise to significant unmet demand, and therefore the case for the present limit on the numbers of licensed Hackney Carriages in the Borough.
- The suitability and location of taxi ranks, and of services for disabled people.

Scope of the Study

1.2 Following discussions about the current situation in the area with Council Officers, we undertook fieldwork and consultations in June 2006, with some consultations continuing into July 2006. The elements were:

- Observations at Hackney Carriage ranks.
- Consultation with organisations having relevant requirements or interests, including those representing or involved with disabled people or people who may experience difficulty in using taxis.
- Consultation with representatives of the taxi trade.
- A market research of residents, conducted in town centre locations.
- Assessment of taxi rank space and location in the context of planned future development in and around the town.

Format of Report

1.3 We review the background to the present situation in Eastbourne Borough in Section 2, and the interpretation of current legislation in respect of “unmet demand” in Section 3. We then describe the work undertaken in the course of the study and the methodologies employed, in section 4.

1.4 In Section 5 we present a review of the taxi trade (Hackney and Private Hire) in Eastbourne Borough and the substance of the consultation findings. In section 6 we present the analysis of the surveys and develop conclusions with reference to legislation. Finally, in section 7 we set out our recommendations and consider the policy options available to the Council.

Terminology

- 1.5 The services provided by private hire vehicles and those provided by Hackney Carriages are, in many respects, identical or very similar. To many members of the public, the two are synonymous, and throughout this report we use the word "taxi" as an all-embracing term, to refer to both Hackney Carriages and private hire vehicles.
- 1.6 It is, however, essential to differentiate between the two types of vehicle and the forms of hiring which they are permitted, by law, to accept. It is also important to understand how the two trades interact. These principles are considered in Section 3. When referring to a specific type of taxi, we use the terms "Hackney Carriage" and "Private Hire"; otherwise we use the general term "taxi" to mean both.

2 BACKGROUND

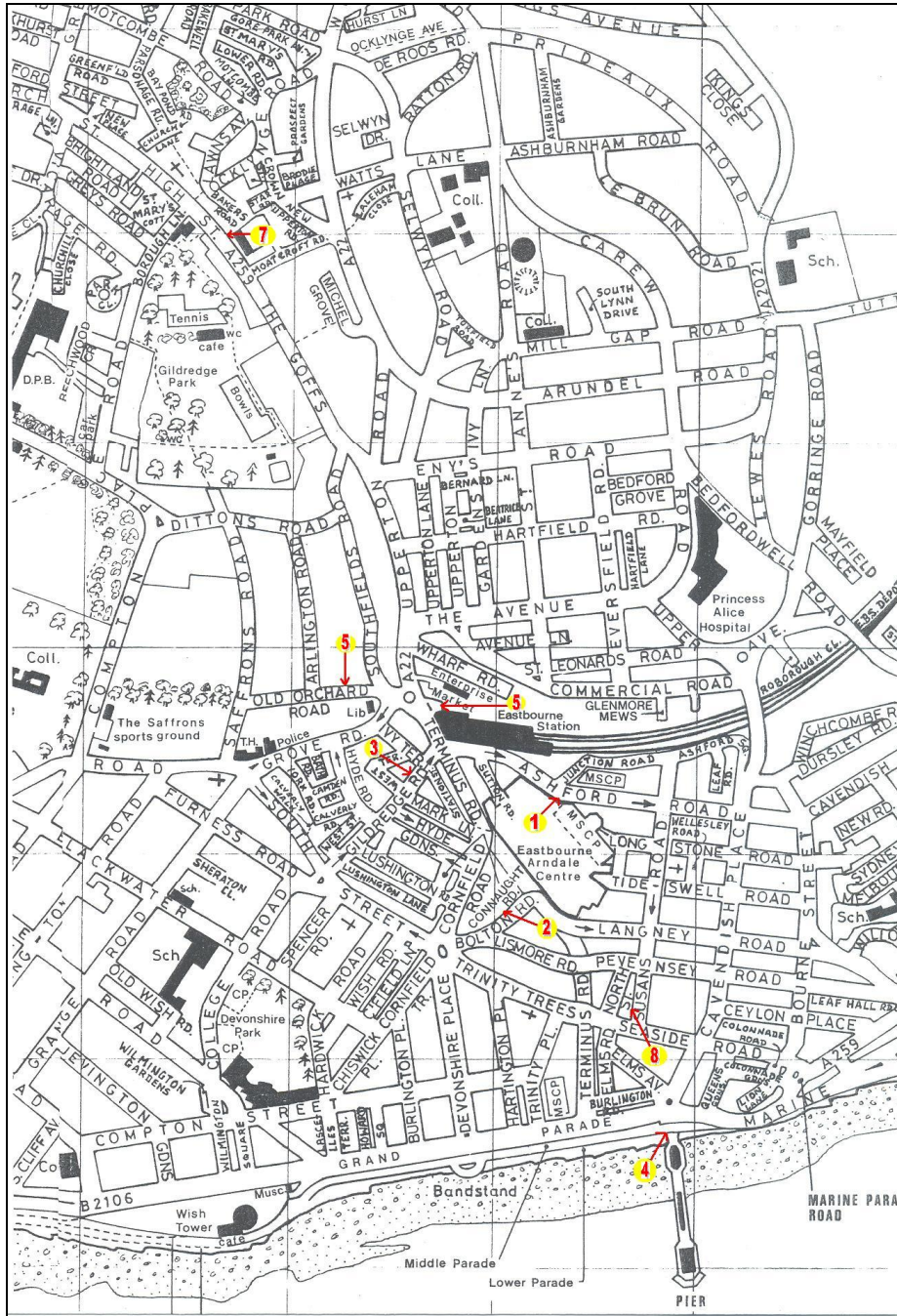
Description of Area

- 2.1 Eastbourne Borough covers an area of just under 46 square kilometres with a total population of around 91,400 (mid 2003 estimates based on 2001 census). The Borough is predominantly urban in nature, and the built up area also includes places such as Polegate, Stone Cross, and Westham/Pevensey that are outside the Borough boundary. Retail and leisure facilities are widespread, and in addition to the main, central shopping area, there are some significant neighbourhood shopping/leisure centres in areas such as Langney, Hampden Park and Sovereign Harbour.
- 2.2 The town is a popular seaside resort, and also has a number of English Language schools, so that there is a significant increase in population during the Summer months, particularly during the school Summer holiday period.
- 2.3 Rail services are provided by Southern Railways, with frequent services connecting Eastbourne to London and South Coast destinations to East and West. The main railway station is Eastbourne Town, with many services also serving Hampden Park Station.
- 2.4 Buses provide extensive public transport facilities for travel within and around the Borough. The main bus operator in the area is Eastbourne Buses. Other services are provided by Stagecoach and recently by a new operator, Cavendish Motor Services. Main corridors are served by Eastbourne Buses until between 11pm and midnight on weekdays and Saturdays.
- 2.5 Nightlife in the Borough is considerable, with several late-licensed premises in Eastbourne. This tends to mean there is a peak of demand for taxis very late at night, when these premises close, particularly but not only on Friday and Saturday nights. Notably, however, this peak has spread in recent years due to revisions to licensing legislation; in practice there is no single time at which late-licensed premises close their doors.
- 2.6 Almost all of the late night activity is concentrated within the area of the town centre. As no bus services operate later than about 11.30pm, the Hackney Carriage and Private Hire fleet provide most of the late night transport services in the Borough.

Taxi Ranks

- 2.7 At the time of the study we understood there to be 8 Hackney Carriage ranks within the Borough. The locations of the ranks are shown on Figure 2.1.

Figure 2.1
Taxi Rank Locations



Plan reproduced by permission of Eastbourne Borough Council

- | | | | |
|---|----------------------|---|------------------|
| 1 | Ashford Road | 2 | Bolton Road |
| 3 | Gildredge Road | 4 | Pier Head |
| 5 | Railway Station | 6 | Old Orchard Road |
| 7 | Old Town High Street | 8 | Susans Road |

Licensed Vehicles and Drivers

- 2.8 The Borough Council licenses both Hackney Carriage and private hire vehicles and drivers. In February 2006, the number of licensed vehicles and drivers *was* as shown below in Table 2.1. Further details of actual current fleet size and turnout are given in Section 5.

Table 2.1 - Number of Current Licences – Spring 2006

	Driver	Vehicle
Hackney Carriage	128	84
Private Hire	315	257

- 2.9 The Hackney Carriage fleet is made up of a mixture of purpose built taxis and saloon / estate cars and MPVs. Restrictions on the numbers of licensed Hackney Carriages have been in place for many years, and we understand that no new licences have been issued for some 30 years. Just over half of the licensed Hackney Carriages are associated with the Eastbourne & Country radio circuit, one of the principal private hire companies in the Town.
- 2.10 The private hire fleet also comprises a mix of vehicles, working through radio circuits. Eastbourne & Country also control a number of Private Hire Cars, and there are a number of significant operators in addition, the largest of which we understand to be Radio Cars and Sussex Cars.

3. INTERPRETATION OF CURRENT LICENSING REGIME

Statutory Basis

- 3.1 Taxi Licensing dates back to the Town Police Clauses Act of 1847. Private Hire vehicles may also be licensed, under the Local Government (Miscellaneous Provisions) Act of 1976. Under the legislation, local authorities are empowered to licence vehicles and drivers for both Hackney Carriage and Private Hire operation. Each licensed vehicle may be driven by the holder of the vehicle licence or by a separately licensed driver.
- 3.2 Hackney Carriages may be licensed to "ply for hire" - to be hired at a rank or hailed in the street - but Private Hire cars may not. Both Private Hire cars and Hackney Carriages are entitled to carry passengers who have pre-booked but it is the entitlement to take immediate hirings from ranks or by hailing in the street which distinguishes a Hackney Carriage.
- 3.3 A Hackney Carriage licence also entitles the holder to apply for, and to be certain of being granted, a special restricted PCV licence which permits the operation of a limited local stage carriage (bus) service.
- 3.4 Section 16 of the Transport Act 1985 requires a licensing authority to grant a Hackney Carriage licence to any valid applicant unless satisfied that there is no significant unmet demand for such a service.
- 3.5 Wider consideration of taxi services was set out in the 1998 White Paper "A New Deal for Transport: Better for Everyone". The subsequent Transport Act 2000 requires local authorities to recognise the importance of taxis in an integrated transport system, and consider them in local transport plans, with particular reference to the provision of sufficient and suitable taxi ranks, and the priority given to different modes of transport in allocating road space.
- 3.6 Further *guidance* from Government in 2004 requires licensing authorities to review their policies in regard to quantity control regularly, and publish the findings of such review, if they intend to refuse the grant of further licences. This guidance suggests the licensing authority must address the issue of "consumer detriment". That is to say, if the number of licences is limited, what evidence is there that consumers benefit from this limit, and conversely, how will it be to the *detriment* of consumers to remove a limit?
- 3.7 Finally, Government has indicated that it intends to apply regulations relating to the 1995 Disability discrimination Act to taxis licensed from 2010 in many local authority areas, to include Eastbourne. This will require any new vehicle to comply to standards yet to be fully determined, but with a view to wheelchair access and other features to assist disabled people.

Interpretation of "Significant Unmet Demand"

- 3.8 A key issue arises in the interpretation of the phrase "significant unmet demand". This clearly must refer to and be confined to the distinctive entitlement associated with a Hackney Carriage licence. A number of court judgements have upheld this view. It is clear, therefore, that "pre-booked" hirings fall outside the scope of the demand which must be addressed.
- 3.9 In practice, there is a wide overlap between the demand for hiring at ranks or by hailing (which we refer to as the Hackney Carriage market) and the demand for hiring made by telephone or in similar ways (which we refer to as the Private Hire market). Most hiring in the Private Hire market is made on an "as soon as possible" basis and, from the customer's point of view, is indistinguishable from hiring in the Hackney Carriage market. The only difference relates to the means of the hiring.
- 3.10 In circumstances where both Hackney Carriage and Private Hire vehicles and drivers are licensed by a local authority to the same or similar standards, somebody seeking to hire a taxi is unlikely to differentiate, in principle, between a Hackney Carriage and a Private Hire vehicle. Many people do not even know that there are two types of vehicle.
- 3.11 Most people will be concerned only about the means of hiring and will, in practice, hire in the way most convenient to them on a particular occasion. If it is possible and most convenient to hire at a rank or by hailing, they will often do so. If there is not a convenient rank or if they judge, on the basis of past experience, that they are likely to have to wait, they are likely to telephone.
- 3.12 It is also important to recognise that, as well as accepting hiring at ranks or by hailing, Hackney Carriages can and often do accept telephone hiring in the same way as Private Hire vehicles. Similarly, they may also take on contract obligations, for the local education authority, social services or other agencies.
- 3.13 In some cases, this private hire work can constitute a significant part of the workload of Hackney Carriages. The activity of Hackney Carriages in the Private Hire market, therefore, can affect their availability to meet demand in the Hackney Carriage market.
- 3.14 With demand to some extent transferable between the Hackney Carriage and Private Hire markets and with the Private Hire market being by far the larger, the Private Hire fleet can act as a "reservoir" of capacity, partially absorbing variations in demand in the Hackney Carriage market.
- 3.15 Both the level of demand in the Hackney Carriage market and the capacity of the Hackney Carriage fleet adequately to service that demand are, therefore, subject to outside influences which can disturb the balance between them. Such influences include the availability or absence of ranks in particular areas;

developments in communications which make telephone hiring easier, and variations in the capacity or pattern of deployment of the Private Hire fleet.

- 3.16 There is, therefore, no simple, direct and permanent relationship between the number of licensed Hackney Carriages and the incidence of unmet demand. In such circumstances, it is the situation of supply and demand as it actually exists which must be assessed, rather than some theoretical consideration of potential demand or potential supply capacity.

Relevant Demand

- 3.17 In the context of Section 16 of the Transport Act (1985), it is the current demand in the Hackney Carriage market which must be considered. Distinction is often drawn between what is called "patent" (ie. that which can be seen) and "latent" (ie. hidden) demand.
- 3.18 Patent demand typically involves a passenger actually hiring a Hackney Carriage in the street or at a rank or an intending passenger waiting in the street for a Hackney Carriage. However, it might be that the level of service from taxi ranks was so poor or unsuitable that people knew that it was not worth waiting and queuing, or that Hackney Carriages were not equipped to carry certain significant types of passenger (such as people in wheelchairs). In this event it would be wrong to conclude that there was no unmet demand simply because there were no queues in the streets.
- 3.19 Having said this, latent demand should not be taken into account without strong justification. Before interpreting latent demand as evidence of unmet demand, there would need to be evidence that the Hackney Carriage service was widely held to be seriously inadequate or unsuitable. Evidence would also be needed that the service as a whole was, in fact, seriously inadequate or unsuitable and that people genuinely wanted a Hackney Carriage service rather than a Private Hire service if an adequate service of this type had been available.

Reasonableness of Waiting

- 3.20 Unmet demand for a hackney carriage will seldom mean that somebody is totally unable to make a journey. The characteristic which distinguishes the hiring of a Hackney Carriage at a rank from other forms of public transport is its "immediate" availability. In our interpretation, therefore, unmet demand may arise if a passenger is not able to make an immediate hiring.
- 3.21 Hailing (except in London and some other large cities) usually accounts for a very small proportion of Hackney Carriage hirings. As reported later, few people in Eastbourne hire hackney carriages by hailing so it is reasonable in assessing unmet demand for Hackney Carriages in the Borough, to base the judgement about direct demand for Hackney Carriages on hiring from ranks.

- 3.22 The law clearly recognises that Hackney Carriages cannot be available for immediate hire at all times and in all places in such numbers as to cater for the maximum number of passengers who might wish to travel. The required criterion is that the extent to which Hackney Carriages are not always immediately available, and, thus, the extent to which passengers have to wait, should not be significant.
- 3.23 In our view, there can be no hard and fast rule as to what level of waiting should be regarded as significant. The incidence of waiting, the average and peak duration of wait, and the number and length of peaks in waiting may all clearly be indicators of unmet demand. Also important in this context is the number of customers waiting in busy periods, as a proportion of the overall level of custom in the area.
- 3.24 We set thresholds for different measurements of waiting, and the values of these are as follows:
- *Proportion of the time passengers were waiting when there was passenger activity at the rank – 10%*
 - *Those who wait more than 5 minutes as a proportion of those who wait at all – 25%*
 - *Those who wait more than 10 minutes as a proportion of those who wait at all – 5%*
- 3.25 If *any two or all three of these three* measures are exceeded, the extent of unmet demand would almost certainly, in our opinion, be significant.
- 3.26 It is, however, essential to interpret waiting in terms of what would be reasonable in the context of local custom and practice. We would not accept the position as indicated by these mathematical measures, without considering the context in which they were made. Circumstances could arise in which only one of the above measures was met and yet unmet demand were regarded as significant due to particular circumstances.
- 3.27 Demand should be assessed across the whole area, the whole day and the whole week - not on the basis of an isolated rank or untypical circumstances. Consideration should also be given to seasonal factors and relatively short, but intense, peak periods of demand, if appropriate. This view has been upheld in a number of court judgements.

4. THE STUDY METHODOLOGY

Rank Survey Methodology

4.1 The methodology used is tried and tested and has been employed in other similar surveys we have conducted in recent years. In a series of "snapshots", we recorded:

- the number of passengers or Hackney Carriages waiting
- the number of passengers hiring a Hackney Carriage
- the number of passengers with disabilities, using wheelchairs or otherwise
- the number of Hackney Carriages picking up jobs at the site.

4.2 To limit any opportunity for the trade to influence the results of the survey, and for reasons of personal safety and security, some observations were carried out from pre-determined covert surveillance points. Surveyors were instructed to act discreetly and not to disclose their schedule of work.

4.3 The taxi trade was aware that a survey was to be undertaken but did not know dates or locations. We are satisfied that there were no events or circumstances which have influenced the results, and therefore the reliability, of the survey results we have used. Following a review of the fieldwork, we did repeat one period of survey which had originally been undertaken on a date when the principal local bus company failed to operate most of its services due to strike action.

4.4 All ranks were included in the survey, at all times when demand could reasonably be expected. At the main ranks the schedule was designed so that all times of day were represented on weekdays and weekends, though not on each individual day of the week. The detailed schedule of surveys at these ranks is summarised in Figure 4.1.

Data Collection and Quality Control

4.5 Surveyors recorded the details of movements and queues at five minute intervals. If any passengers were waiting, the surveyors noted a brief description of them in order to establish whether they were still waiting at the time of subsequent observation(s). Any incidents or circumstances which might have affected the supply of or demand for Hackney Carriages were also noted, and are considered in our conclusions.

4.6 Supervisory checks were made during the course of the survey, when a member of the professional project team visited surveyors on site to check that work was undertaken as scheduled and in accordance with instructions. Surveyors were not told of these checks in advance.

Figure 4.1
Schedule of Rank Surveys

Ashford Road

Day	Hour Commencing																							
	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	0	1	2	3		
Friday				X	X			X	X	X						X	X							
Saturday					X	X				X	X				X	X								
Sunday							X	X																
Monday											X													
Tuesday				X	X				X															
Wednesday						X	X																	
Thursday										X		X	X		X	X								

Bolton Road

Day	Hour Commencing																							
	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	0	1	2	3		
Friday															X			X	X	X	X	X		
Saturday						X	X				X	X		X			X	X	X					
Sunday				X				X	X			X												
Monday					X	X																		
Tuesday						X	X																	
Wednesday			X					X	X		X	X	X		X	X								
Thursday										X														

Gildredge Road

Day	Hour Commencing																							
	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	0	1	2	3		
Friday													X	X	X	X			X	X	X	X		
Saturday							X	X		X	X			X	X	X	X		X	X	X	X		
Sunday						X								X		X	X							
Monday																								
Tuesday			X				X		X	X														
Wednesday				X						X	X			X	X									
Thursday					X												X	X						

Pier Head

Day	Hour Commencing																							
	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	0	1	2	3		
Friday																X	X				X	X		
Saturday						X	X									X	X				X	X		
Sunday						X	X							X		X	X							
Monday									X	X														
Tuesday																								
Wednesday												X	X											
Thursday																								

Railway Station / OOR

Day	Hour Commencing																							
	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	0	1	2	3		
Friday											X	X	X					X	X	X				
Saturday				X	X		X	X	X	X	X		X	X		X	X	X	X	X	X	X		
Sunday					X	X	X				X	X	X											
Monday			X	X																				
Tuesday					X	X																		
Wednesday						X	X																	
Thursday							X	X						X	X									

Old Town High St

Day	Hour Commencing																							
	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	0	1	2	3		
Friday				X	X									X	X			X	X	X	X	X		
Saturday																								
Sunday																								
Monday												X	X											
Tuesday										X	X													
Wednesday						X	X																	
Thursday					X	X									X	X								

Susans Road

Day	Hour Commencing																							
	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	0	1	2	3		
Friday					X	X																		
Saturday																	X	X	X	X	X	X		
Sunday																								
Monday							X																	
Tuesday							X	X																
Wednesday				X																				
Thursday										X	X													

- 4.7 A full record of all observations made during the survey at ranks is presented in Appendix A. Some short periods of observation were duplicated - that is to say that two surveyors or one surveyor and one supervisor undertook recordings independently for the same place at the same time - as a further quality control check.

Market research Methodology

- 4.8 In total, 391 interviews were conducted at four different locations within the Borough:
- [The Arndale Centre / Terminus Road](#)
 - [Eastbourne Central Railway Station](#)
 - [Old Town High Street, Morrisons](#)
 - [Crumbles, ASDA](#)
- 4.9 The purpose of the surveys was to establish the frequency with which people hire taxis in particular ways; their views about what constitutes a reasonable time to have to wait for a taxi and their experience of having to wait or being unable to effect a hiring. Additional questions addressed other perceptions in relation to the service, and the specific issue of whether there are places in Eastbourne where additional taxi ranks would be valued.
- 4.10 Our questionnaire is designed to avoid the respondent needing to know or understand the difference between a Hackney Carriage and a private hire vehicle. The core questions are carried over from previous surveys to allow comparison, and some additional questions have been added to assess some other measures of general satisfaction.
- 4.11 Full interviews were generally conducted with respondents who were residents of Eastbourne Borough and who had used taxis at least once in the last year. We allowed for a small number of interviews with residents of areas forming part of "Greater Eastbourne" (Polegate, Stone Cross, Willingdon) given that some of their demand for taxis is likely to be serviced from Eastbourne. The interviewers kept a record of people who were resident in the area but claimed never to use taxis, but did not proceed to a full interview with such people.
- 4.12 For each assignment, quotas were set so that all age groups as defined on the questionnaire were reasonably evenly represented. We also set quota requirements for gender.

Conduct of Survey

- 4.13 The questionnaires were completed by the *interviewer* in all cases. A copy of the form is reproduced in Appendix D.
- 4.14 Respondents were asked to indicate their age (range), sex and whether they had access to a car. Replies were anonymous, but some people declined to reveal some items of information, so that the results for some sub-groupings

ignore or show separately those people who did not, for example, state their gender or age group.

- 4.15 Analysis was carried out to compare the characteristics of the people who had responded with those of the general population as identified from the 2001 OPCS census, updated where available.
- 4.16 Details of the characteristics of the respondent group, in comparison with the total population of the Borough, are shown in the various analyses in the Appendices. Appropriate adjustments have been made in presenting the data, so that each age group is, as far as possible, given its due weighting.

Data Verification and Analysis

- 4.17 Various minor adjustments were made to the data to eliminate logical inconsistencies as follows:
- (i) where the frequency of hiring by one individual method was higher than the overall frequency of hiring, the latter was assumed to be equal to the most frequent form of hiring by an individual method.
 - (ii) where no frequency of hiring by an individual method was given, it was assumed that no hirings were made using that method.
 - (iii) answers relating to experience of waiting in respect of methods of hiring which were never used by the respondent were discarded.
- 4.18 A detailed analysis of the data is presented in the Appendices. Analyses are shown separately for a number of different groups within the sample.

Consultations

- 4.19 As an integral part of the study we consulted with various organisations and individuals in order to obtain factual information and views. The main consultees were:
- (i) Council officers
 - (ii) Representatives of people with disabilities
 - (iii) The Hackney Carriage trade
 - (iv) Local Business and leisure facility managers
 - (v) Police and Town Centre Management
- 4.20 The purpose of the various consultations is briefly set out below. The opinions put forward and our analysis of them are presented in Section 5. Those we approached were co-operative and helpful, and their assistance is gratefully acknowledged.
- 4.21 Before the surveys began, we met officers of the Council, to update our understanding of the taxi trade and the circumstances in which it operates. These discussions also helped in reviewing the issues which lead to studies of

this nature, and the organisations which might be consulted regarding their particular experiences and requirements from a taxi service.

Disabled People

- 4.22 We need to consider the specific demands and experiences of disabled people in developing our conclusions, particularly in view of the 1995 Disability Discrimination Act, which put in place a framework for making public transport, including taxis, more accessible in the future.
- 4.23 Telephone discussions were conducted with the Chairman of the local Access Group, and representatives of the Eastbourne Association of Voluntary Services (EAVS), The Middle of the Road Club (MORE), East Sussex Disability Association (ESDA) and The MS Society, amongst others.

The Taxi Trade

- 4.24 We met with representatives of the Eastbourne Hackney Carriage Association, and had additional conversations with some individual licensees, following completion of most of the survey fieldwork. We asked for views about the current situation from the trade perspective and attitudes to possible policy developments and other options for change, either connected with the study or more generally.
- 4.25 The discussions took place after the main rank survey period in order to minimise the risk of the trade modifying their normal pattern of working in an attempt to influence the results of the rank survey (or any accusation that this had happened).
- 4.26 The trade were given the opportunity to raise any matter they considered relevant. The representatives were invited specifically to comment on the likely consequences of any move to remove or relax restrictions on obtaining Hackney Carriage licences, and their perception of changes to the level and pattern of the business over the last two years. Discussion also focussed on the likely impact of the Disability Discrimination Act on the taxi trade, and the Hackney Carriage trade in particular.

5. THE RESULTS OF CONSULTATIONS

Introduction

- 5.1 This section of the report summarises the discussions and consultations undertaken, and considers the current and future state of the taxi market in Eastbourne, and the way this might be expected to influence the results of the survey.
- 5.2 Transcripts or summaries of the meetings held during the consultation exercise are reproduced in appendix D, together with any written responses received from consultees.

Organisation of the Hackney Carriage Trade

- 5.3 There are 84 licensed Hackney Carriages and around 257 licensed private hire vehicles currently working in Eastbourne Borough. This represents one Hackney Carriage for every 1088 residents of Eastbourne, or in the broader sense, a taxi for every 268. This is a better provision than for other areas we have surveyed in recent years (currently averaging a Hackney Carriage for every 1733 residents, and a taxi for every 472), but this may be partly offset by the role of Eastbourne as an attractant for residents living outside the Borough.
- 5.4 Many drivers are attached to one or other of the radio circuits operating in the area, generally the “Eastbourne & Country” circuit. Such vehicles can take hirings directly from passengers at ranks or when hailed, and also through the circuit. A number of others advertise their services and take telephone bookings as a result, but there are also still a number of licence holders who rely solely or very largely on the work they get by plying for hire at taxi ranks.
- 5.5 Some in the trade also work on contract to social services and education authorities, among others. The demand for vehicles to fulfil such contracts peaks at the start of the morning and in the mid to late afternoon on schooldays, when many of the licensed Hackney Carriages in the Borough (and most of the wheelchair accessible vehicles) are committed to this work.
- 5.6 Contractors use taxis in combination with other more specialist transport facilities, to reduce costs, and taxi operators generally find this a useful source of basic guaranteed income to supplement earnings from ad-hoc hirings at ranks or through circuits.

Views of the Hackney Carriage Trade

- 5.7 The hackney trade representatives we spoke to generally:
- [Support current policy in relation to quantity control](#)

- Support the current policy to license a mixed fleet of vehicles with voluntary option to acquire “accessible” vehicles
- Have concerns about traffic management in the town centre, and in particular have lobbied authorities consistently over their wish to be granted access to the bus only parts of Terminus Road.
- Have concerns also about the enforcement of parking restrictions in the town centre, particularly at night.

5.8 They feel that there is unlikely to be significant unmet demand in the area, based on the level of business experienced in particular by independent plateholders not associated with any of the private hire circuits in the town. If there are to be more Hackney Carriages in the town their concerns would include the availability of rank space for those vehicles.

5.9 Those few licensees with vehicles accessible for wheelchairs (the number of these has actually diminished in recent years) report that the amount of specialist work they get does not justify the additional investment in a suitable vehicle, but they do at least benefit from the larger carrying capacity of such vehicles (being licensed to carry 5 or 6 passengers) for some more general work, particularly at night.

5.10 We discussed with the trade the absence of vehicles for hire at some of the taxi ranks in the main central areas at night – principally Bolton Road, Gildredge Road and the Pier Head.

- At Bolton Road the trade’s concern is the lack of effective Police action in enforcing parking restrictions at night. Given that the rank is within a one-way system, finding the rank blocked is not a risk many drivers are prepared to take.
- Gildredge Road is not used due to its proximity to the Station
- The Pier Head rank is also often blocked by private cars, and is not used for this reason, and because the trade do not agree with the design. They have asked for a more traditional queuing rank as part of any redesign of the space in this area.

5.11 In addition to the use of Terminus Road, trade representatives spoke of the desirability of establishing a night only rank at the point in Langney Road that is currently reserved for loading, that would be more or less visible to customers both of Kings and TJs nightclubs.

Use of Taxis by Disabled People

5.12 We sought the views of people with disabilities through various representative bodies as outlined in Section 4 above. We also ensured that we had spoken to individuals with relevant disabilities or sensory impairments, so that direct views were in some cases obtained.

- 5.13 Disabled people tend to identify operators they are happy to contact for their travel needs, and in this respect their demand is predominantly for a private hire service. Nevertheless, many need or prefer to use Hackney Carriages for the greater accessibility of some of the vehicles, and so their needs may be met from the Hackney Carriage domain.
- 5.14 In Eastbourne, we understand that less than 10% of the currently licensed Hackney Carriages are wheelchair accessible. A small number of Private Hire Cars are also accessible, but in overall terms these vehicles are a very small minority in the fleet. Given that these vehicles are in demand on a daily basis for Education / Social Services Departments of East Sussex County Council, to convey clients morning and afternoon, it is not surprising that we hear reported difficulties in hiring an accessible vehicle at relevant times.
- 5.15 Whilst the Disability Discrimination Act will ultimately produce new standards for vehicle design, and Licensing Authorities may justifiably await regulation before imposing any new standards in local areas, it may be that policy adjustments can in the meantime be made that will encourage greater general provision of accessible vehicles. Driver awareness and training is also a matter which could be addressed; comments have been made to the effect that the standard of care and consideration is extremely variable between and within the main operating companies. We believe this could ultimately be to the benefit of all concerned, and will comment further in setting out recommendations.

Other Consultees and Contacts

- 5.16 Records of a number of discussions that took place are contained within the separate Appendix to this report. Some key points to emerge from our conversations and meetings, and our own consideration of the operation of taxis in the area, which may be considered in our recommendations and in the Council's review of policy, are as follows:
- The concentration of late night business onto a single rank is unsatisfactory from a number of viewpoints, primarily related to public order and safety, and to the efficiency of the taxi service delivered.
 - The fact that this rank is in an area of limited space at the Station, and that there is another area at the Station reserved for the use of taxis, which is not used at all, only adds to the sense that vehicles could be better deployed.
 - The number of accessible vehicles at certain times of day on weekdays is a clear obstacle to the mobility of those people who rely on those vehicles.
- 5.17 We also obtained a useful response (50 in total) to a questionnaire circulated to all consultees, which represents the view of the local business community in addition to organisations representing disabled people's interests. Some of the key findings from this exercise are as follows:

- The trade is rated highly in terms of vehicles, their presentation and the helpfulness of drivers, but less so in terms of value for money and reliability and timekeeping. The overall rating in the view of the vast majority is either “good” or “satisfactory”.
- Views as to the numbers of taxis available are shown in the following section, by way of comparison with the view of the public in general. Most people did not seem to think the quality of service was significantly better or worse in comparison with the position 2 years ago. In this respect the response was very similar to that of the general public, detailed in Section 6.
- The majority of consultees seem to be in favour of the Council retaining its policy of quantity control, 44% giving this unqualified support, and a further 17% supporting control to avoid extreme under or over-supply.

Taxis in the Transport Planning Context

- 5.18 Transport and public transport planning in the area is the responsibility of East Sussex County Council, through an area based in Eastbourne. We have discussed past concerns, and current and future projects, with Council officers, to try to identify matters of possible significance to the trade.
- 5.19 Although there has been some discussion regarding taxi ranks, the Council has no firm proposals to establish new ranks at present. We understand that plans are under way for some town centre redevelopment centred on an expansion of the Arndale Centre, subject to planning approval. This is clearly a long term matter, and no firm plans exist at the present time, but it is quite likely that the overall movement of traffic around the centre will alter in the longer term.
- 5.20 In the meantime, the main issue raised by the taxi trade, being the potential for use of Terminus Road by taxis for access and to ply for hire, has been specifically considered in recent months by the Council, and we understand there is no basis for a change to the Council position at present.
- 5.21 There has also been discussion about the possibility of a night rank in Langney Road to serve customers of night clubs in the area, utilising space currently reserved for loading. Whilst the principle is accepted by the Council that this could be useful, there are problems in making such dual purpose spaces work, and the specific area in question has also been “reserved”, albeit not officially, by the Police so that patrol vehicles can be available on standby for incidents within the town centre late at night.

6. THE SURVEY RESULTS

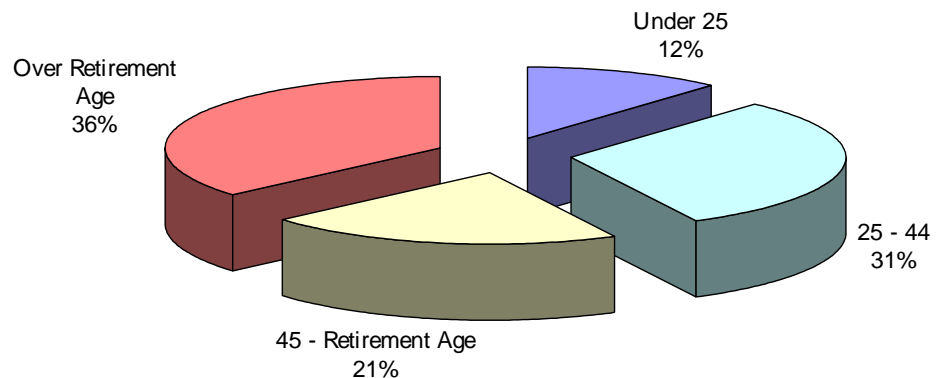
Introduction

- 6.1 This section sets out the findings from the market research and rank surveys. Taking these and the results of the consultations, we then make recommendations and consider options in relation to Hackney Carriage licensing in the Borough. These take account of current legislation, anticipated future regulation and developments, and the guidance given by Government to Licensing Authorities in recent years.

Market research – Overall Service Ratings

- 6.2 The respondents were reasonably well balanced between the genders and age groups, with the latter breakdown shown below in Figure 6.1. Response from the wards defined as “Central” (Devonshire and Upperton) was slightly disappointing, but the overall response was in excess of what we had planned for, so results are robust.

Figure 6.1
Age Profile of Respondents

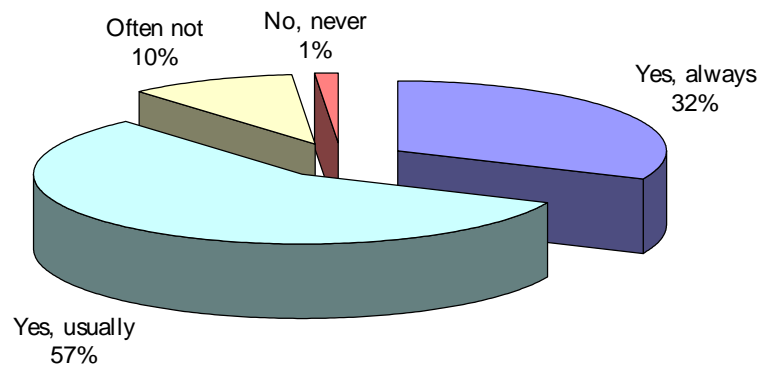


- 6.3 The on-street survey actually involved speaking to 828 people, 437 (or 53%) of whom claimed never to use taxis at all. In analysis this value has been adjusted to reflect the lower proportion reported by *postal* surveys in our past experience, in which respondents are likely to reflect the population more accurately (in on-street surveys this response can be used as a means of avoiding the interview).

- 6.4 In addition to the questions asked in past surveys to test for possible frustrated demand, we made use of the questionnaire to ask local people their opinions of the taxi service, the type of service they prefer to use, and the perceived improvement or otherwise in the service over the past two years. Responses to some of these questions are shown in Figures 6.2 to 6.4. In the first of these, the same question was put to groups and individuals involved in the consultation process, and their responses are also shown for comparison. Although the sample here is much smaller, it seems clear that the experience of these people differs from the population as a whole.
- 6.5 64% of those who expressed an opinion said they thought the service was excellent or good overall. This is a good result in our experience, better than average looking at other recent studies.

Figure 6.2

Do you think there are enough taxis in Eastbourne Borough?



Responses to the same question from consultees (local businesses and people with disabilities)

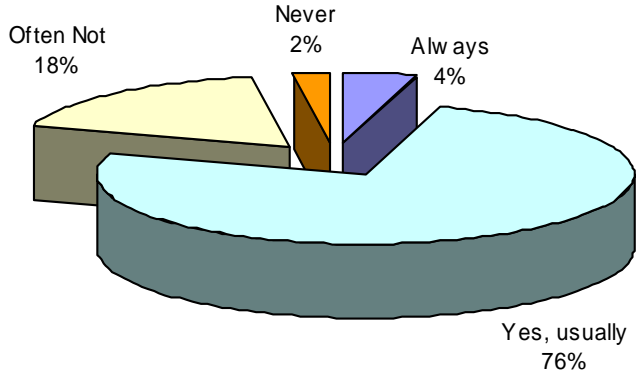


Figure 6.3
When you hire a taxi in Eastbourne is it usually a Hackney Carriage or a Private Hire Car?

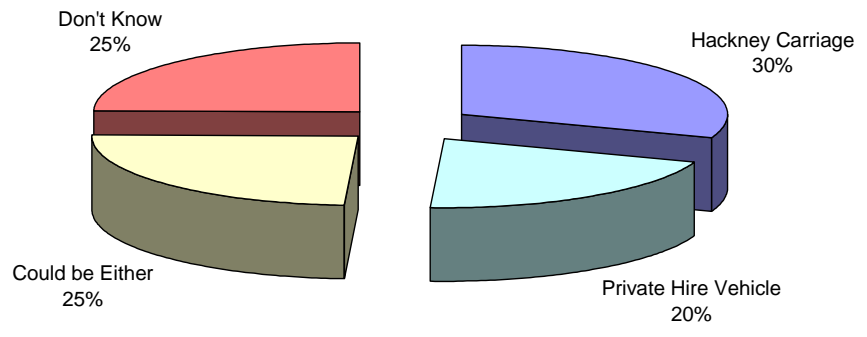
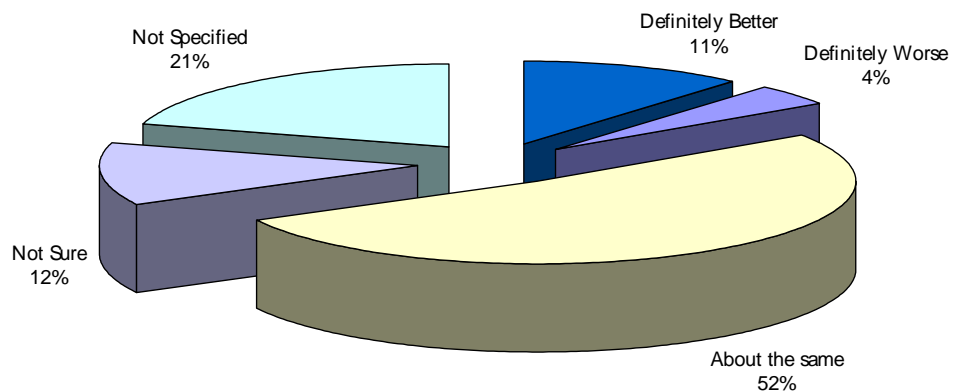


Figure 6.4
How do you think the taxi service in Eastbourne has changed in the last two years?



6.6 As to whether or not the service to the public is better or worse in recent years, Figure 6.4 suggests opinions are mixed, but on balance respondents think the position is slightly improved.

6.7 When figures are interpreted, we must remember that 70% suggested when they hire a taxi, it will normally be a private hire car or might be either a Hackney Carriage or a private hire car, indicating that most of these people normally hire in the private hire domain. This indicates to us a strong private hire culture in Eastbourne, and we must be careful not to interpret views about the overall market as being views of the Hackney Carriage trade.

Characteristics of the Market

6.8 Table 6.1 shows a summary analysis of the market research. Full and sub-group analyses are included in the separate Appendix. Some of the main conclusions that can be drawn from the analysis are that:

- Hailing is a very uncommon means of hiring, as is often the case outside London and other large conurbations
- The majority (we estimate 66%) of all hirings are made by telephone, whilst just under 25% of all hirings are estimated to be from taxi ranks
- This research points to an overall **3.81 million** taxi hirings annually in Eastbourne. We determine this from each respondent's estimate of their hiring by each method and with reference to the overall population in each of the age groups surveyed. This total figure comes to 5.71 million annually, but must be adjusted to take account of the fact that there are on average 1.5 people in each taxi when it is hired.

6.9 Around 17% of all respondents, and 15.4% of those who use taxis from ranks, reported experience of being unable to hire a taxi within a reasonable time on

an occasion when they wanted one (this compares favourably with 22% and 25% of all respondents in other surveys conducted by us in the last 5 years). Some of the more common comments concerned Christmas/New Year periods, or late nights. Schooltimes were also mentioned by several, and the difficulty of finding suitable vehicles for buggies and small children.

Taxi Rank Locations

6.10 Respondents were asked to suggest locations where they felt additional taxi rank could usefully be established. A full list of responses received is included in the appendix, but the most suggested, in order of frequency, were as follows:

- ASDA / Crumbles
- By or near the Pier
- On the Seafront
- At Morrisons
- At the other side of the Station
- At Supermarkets generally
- Terminus Road
- By Theatres
- At DGH
- Sovereign Harbour

6.11 It is recognised that in two of these there is already a rank in place – we must assume the presence of these on the list implies a public perception that these ranks are not used by the trade. Views will be considered in developing our final conclusions, but it must be remembered that these views cannot be taken as implying a demand for a service in practice.

Differences between Respondent Groups

6.12 The analysis of the market research demonstrates a number of differences in behaviour for different respondent groups. Conclusions can be drawn with less reliability from smaller sub-samples of the respondents, and caution is required in drawing conclusions. Nevertheless, *younger* people (16-24) claim to use taxis most overall, particularly from ranks. Other comparisons include:

- Women are slightly more likely to hire taxis overall, particularly in the youngest and oldest age groups.
- More *rank* hiring, however, is likely from young men – young women are more likely to telephone.
- Women tend to be more tolerant of waiting at ranks, except in the youngest age group.

- Central area residents tend to use taxis from ranks more often than those living further out – they are of course more likely to have a rank accessible to them near their home - and to telephone for taxis less often.
- Those without access to a car use taxis more, with the exception of young people (16-24) for whom there appeared to be no significant difference. This effect is more marked in relation to telephone hiring.

Table 6.1

Questionnaire Survey Analysis Summary

Overall Rating of Taxi Services in Eastbourne

Rating	Sample	
	No	%
Excellent	75	15.60%
Good	233	48.60%
Fair	63	13.10%
Poor	7	1.50%
Don't Know	3	0.70%
Not Specified	98	20.50%

Frequency of Taxi Use

Frequency	Sample	
	No	%
Never	97	20.90%
Hardly ever	77	16.10%
Several Times a Year	115	23.90%
Several Times a Month	98	20.30%
Several Times a Week	79	16.40%
Most Days	14	3.00%

How do you think the taxi service in Eastbourne has changed in the last two years?

Rating	Sample	
	No	%
Definitely Better	54	11.20%
Definitely Worse	20	4.10%
About the Same	249	52.00%
Not Sure	58	12.00%
Not Specified	99	20.60%

Are there enough taxis available in the area?

Rating	Sample	
	No	%
Yes, always	120	25.10%
Yes, usually	217	45.20%
Often not	38	8.00%
No, never	5	1.00%
Not Specified	99	20.70%

When you use a taxi locally, is it usually a Hackney Carriage or a Private Hire Car?

Rating	Sample	
	No	%
Hackney Carriage	117	24.40%
Private Hire Car	77	16.10%
Could be Either	94	19.60%
Don't Know	94	19.60%
Not Specified	97	20.30%

Incidence of Having to Hire in a Different Way from that Preferred

	Sample	
	No	%
No	330	86.40%
Yes	52	13.60%

Incidence of Hire Being Impossible

	Sample	
	No	%
No	315	82.90%
Yes	65	17.10%

Frequency of Hiring by Different Methods

Frequency	Method of Hiring									
	Rank		Hailing		Booking Off		Telephone		By Another	
	No	%	No	%	No	%	No	%	No	%
Never	322	67.10%	465	97.00%	441	92.00%	151	31.60%	454	94.80%
Hardly ever	51	10.70%	10	2.10%	17	3.60%	65	13.60%	16	3.30%
Several Times a Year	35	7.30%	1	0.10%	4	0.80%	93	19.50%	4	0.80%
Several Times a Month	39	8.10%	2	0.40%	9	1.80%	83	17.40%	3	0.70%
Several Times a Week	31	6.40%	2	0.40%	7	1.40%	76	15.90%	2	0.40%
Most Days	2	0.40%	0	0.00%	1	0.20%	11	2.20%	0	0.00%

Duration of Wait Regarded as Reasonable for Different Methods of Hiring

Duration	Method of Hiring									
	Rank		Hailing		Booking Off		Telephone		By Another	
	No	%	No	%	No	%	No	%	No	%
No Time at All	183	60.70%	230	91.40%	196	75.20%	49	13.10%	194	75.50%
Up to 5 minutes	59	19.80%	19	7.50%	36	13.90%	91	24.50%	29	11.40%
5+ to 10 minutes	49	16.40%	2	0.80%	20	7.70%	137	36.60%	19	7.50%
10+ to 15 minutes	8	2.60%	1	0.30%	6	2.40%	70	18.70%	10	3.90%
15+ to 20 minutes	2	0.60%	0	0.00%	1	0.40%	22	5.90%	3	1.10%
Over 20 minutes	0	0.00%	0	0.00%	1	0.30%	4	1.20%	1	0.50%

Frequency of Having to Wait Longer than Reasonable by Different Methods of Hiring

Frequency	Method of Hiring									
	Rank		Hailing		Booking Off		Telephone		By Another	
	No	%	No	%	No	%	No	%	No	%
Never or Hardly ever	248	82.40%	246	97.70%	250	95.90%	272	72.90%	254	98.90%
Sometimes	46	15.20%	4	1.60%	7	2.90%	87	23.30%	3	1.10%
Often	7	2.50%	2	0.70%	3	1.30%	14	3.80%	0	0.00%

The Rank Survey - Pattern of hiring from Ranks

- 6.13 A total of 1984 "snapshot" observations were made of the availability of hackneys at ranks and any passengers who were waiting. There was passenger activity on 607 occasions, with Hackney Carriages available for hire on 583 occasions.
- 6.14 A series of Tables present an analysis of the incidence of Hackney availability and passenger waiting and of the level of hiring at each rank (Tables 6.2 to 6.6). Analyses cover the whole day and, separately, four periods of the day:
- Morning (before noon)
 - Afternoon (before 6pm)

- Evening (before midnight)
- Late Night (after midnight)

6.15 Each tabulation covers:

- Availability of Hackney Carriages and incidence of passenger waiting
- Duration of passenger wait
- Level of hiring
- Level of use by people with mobility difficulty

6.16 A number of statistics are shown in these Tables, including the average passenger loading per job. The average loading throughout the Borough is 1.5 for the ranks and times we have observed, consistent with the average in our recent experience. The average loading is higher for late night hirings where ranks service demand from clubs and other places of entertainment. After midnight, an average of 1.9 people left in every loaded Hackney Carriage from ranks. Again this is consistent with averages elsewhere.

6.17 Of the active ranks, the Railway Station was the busiest – results are combined with the Old Orchard Road rank, given that we established that, with very few exceptions, the latter serves solely as a “feeder” for the former. We recorded 33.3 hirings per hour of observation here, with a peak of 46.9 per hour in the period after midnight when it serves people travelling to and from night clubs and other places of entertainment. Over the whole area and the whole day, there were 9.44 hirings per survey hour.

6.18 This is not the full story, given that the times we surveyed included more of what we anticipated would be the busiest periods. We have however used the results from survey periods to estimate the overall numbers of rank hirings in the Borough. A summary of this analysis is shown in Table 6.7. If these estimates are correct, they represent an average of 63 jobs per week from ranks, for each of the 84 licensed Hackney Carriages.

6.19 These figures, and the analysis for Table 6.7, confirm that the Station rank is the most heavily used, with an unusually high concentration of business focussed here. Our *overall* estimated breakdown of hirings is as follows:

- 73% at the Station
- 13% at Bolton Road
- 6% at Ashford Road
- 4% at the Pier Head
- 4% at all other ranks combined.

Table 6.2

Rank Survey - Results for Whole Day

(a) Hackney Availability and Incidence of Waiting

Rank	Number of Obsn's	Occasions of Activity	Occasions Taxi Available		Occasions Passengers Waiting		
			Obsn's	% of All Obsn's	Obsn's	% of All Obsn's	% of Active Occasions
Ashford Road	310	85	102	32.90%	28	9.03%	32.94%
Bolton Road	361	109	104	28.81%	20	5.54%	18.35%
Gildredge Road	382	0	15	3.93%	0	0.00%	0.00%
Pier Head	152	29	12	7.89%	12	7.89%	41.38%
Railway Station / OOR	409	346	304	74.33%	74	18.09%	21.39%
Old Town High St	221	28	24	10.86%	6	2.71%	21.43%
Susans Road	149	10	22	14.77%	0	0.00%	0.00%
All Ranks	1984	607	583	29.39%	140	7.06%	23.06%

(b) Analysis of Duration of Passenger Wait

Rank	Number of Pass'rs Waiting	Duration of Wait					
		Up to 5 mins	5 mins to 10 mins	10 mins to 15 mins	15 mins to 20mins	20 mins to 25 mins	Over 25 mins
Ashford Road	62	56	6	0	0	0	0
Bolton Road	24	12	8	0	0	4	0
Gildredge Road	0	0	0	0	0	0	0
Pier Head	53	43	0	0	2	8	0
Railway Station / OOR	249	208	33	4	1	3	0
Old Town High St	6	2	4	0	0	0	0
Susans Road	0	0	0	0	0	0	0
All Ranks	394	321	51	4	3	15	0

(c) Level of Hirings

Rank	Period of Obsn's (Minutes)	Jobs (Taxis) From Rank		Passengers From Rank		Average Loading per Job
		Total	Per Hour	Total	Per Hour	
Ashford Road	1550	90	3.5	124	4.8	1.4
Bolton Road	1805	158	5.3	228	7.6	1.4
Gildredge Road	1910	0	0.0	0	0.0	0.0
Pier Head	760	38	3.0	77	6.1	2.0
Railway Station / OOR	2045	1134	33.3	1752	51.4	1.5
Old Town High St	1105	24	1.3	35	1.9	1.5
Susans Road	745	10	0.8	13	1.0	1.3
All Ranks	9175	1444	9.44	2216	14.49	1.5

(d) Level of Use by People with Mobility Difficulty

Rank	Number of Pass'rs Total	Passengers with Mobility Difficulty			
		Wheelchair	Other	Total	%
Ashford Road	124	1	12	13	10.5%
Bolton Road	228	3	7	10	4.4%
Gildredge Road	0	0	0	0	0.0%
Pier Head	77	0	0	0	0.0%
Railway Station / OOR	1752	8	31	39	2.2%
Old Town High St	35	0	0	0	0.0%
Susans Road	13	0	0	0	0.0%
All Ranks	2216	12	50	62	2.8%

Table 6.3

Rank Survey - Results for Morning (07:00-11:59) Only

(a) Hackney Availability and Incidence of Waiting

Rank	Number of Obsn's	Occasions of Activity	Occasions Taxi Available		Occasions Passengers Waiting		
			Obsn's	% of All Obsn's	Obsn's	% of All Obsn's	% of Active Occasions
Ashford Road	82	30	60	73.17%	6	7.32%	20.00%
Bolton Road	59	19	35	59.32%	0	0.00%	0.00%
Gildredge Road	36	0	2	5.56%	0	0.00%	0.00%
Pier Head	0	0	0	0.00%	0	0.00%	0.00%
Railway Station / OOR	59	38	46	77.97%	2	3.39%	5.26%
Old Town High St	35	6	7	20.00%	1	2.86%	16.67%
Susans Road	22	1	1	4.55%	0	0.00%	0.00%
All Ranks	293	94	151	51.54%	9	3.07%	9.57%

(b) Analysis of Duration of Passenger Wait

Rank	Number of Pass'srs Waiting	Duration of Wait					
		Up to 5 mins	5 mins to 10 mins	10 mins to 15 mins	15 mins to 20mins	20 mins to 25 mins	Over 25 mins
Ashford Road	8	7	1	0	0	0	0
Bolton Road	0	0	0	0	0	0	0
Gildredge Road	0	0	0	0	0	0	0
Pier Head	0	0	0	0	0	0	0
Railway Station / OOR	8	8	0	0	0	0	0
Old Town High St	1	1	0	0	0	0	0
Susans Road	0	0	0	0	0	0	0
All Ranks	17	16	1	0	0	0	0

(c) Level of Hirings

Rank	Period of Obsn's (Minutes)	Jobs (Taxis) From Rank		Passengers From Rank		Average Loading per Job
		Total	Per Hour	Total	Per Hour	
Ashford Road	410	40	5.9	49	7.2	1.2
Bolton Road	295	35	7.1	44	8.9	1.3
Gildredge Road	180	0	0.0	0	0.0	0.0
Pier Head	0	0	0.0	0	0.0	0.0
Railway Station / OOR	295	81	16.5	97	19.7	1.2
Old Town High St	175	6	2.1	6	2.1	1.0
Susans Road	110	1	0.5	1	0.5	1.0
All Ranks	1355	162	7.17	196	8.68	1.2

(d) Level of Use by People with Mobility Difficulty

Rank	Number of Pass'srs Total	Passengers with Mobility Difficulty			
		Wheelchair	Other	Total	%
Ashford Road	49	1	8	9	18.4%
Bolton Road	44	1	0	1	2.3%
Gildredge Road	0	0	0	0	0.0%
Pier Head	0	0	0	0	0.0%
Railway Station / OOR	97	0	18	18	18.6%
Old Town High St	6	0	0	0	0.0%
Susans Road	1	0	0	0	0.0%
All Ranks	196	2	26	28	14.3%

Table 6.4

Rank Survey - Results for Afternoon (12:00-17:59) Only

(a) Hackney Availability and Incidence of Waiting

Rank	Number of Obsn's	Occasions of Activity	Occasions Taxi Available		Occasions Passengers Waiting		
			Obsn's	% of All Obsn's	Obsn's	% of All Obsn's	% of Active Occasions
Ashford Road	142	54	42	29.58%	21	14.79%	38.89%
Bolton Road	131	83	64	48.85%	20	15.27%	24.10%
Gildredge Road	73	0	13	17.81%	0	0.00%	0.00%
Pier Head	57	7	1	1.75%	5	8.77%	71.43%
Railway Station / OOR	151	126	100	66.23%	35	23.18%	27.78%
Old Town High St	70	7	1	1.43%	1	1.43%	14.29%
Susans Road	73	5	21	28.77%	0	0.00%	0.00%
All Ranks	697	282	242	34.72%	82	11.76%	29.08%

(b) Analysis of Duration of Passenger Wait

Rank	Number of Pass'rs Waiting	Duration of Wait					
		Up to 5 mins	5 mins to 10 mins	10 mins to 15 mins	15 mins to 20mins	20 mins to 25 mins	Over 25 mins
Ashford Road	52	47	5	0	0	0	0
Bolton Road	24	12	8	0	0	4	0
Gildredge Road	0	0	0	0	0	0	0
Pier Head	16	6	0	0	2	8	0
Railway Station / OOR	94	57	29	4	1	3	0
Old Town High St	1	1	0	0	0	0	0
Susans Road	0	0	0	0	0	0	0
All Ranks	187	123	42	4	3	15	0

(c) Level of Hirings

Rank	Period of Obsn's (Minutes)	Jobs (Taxis) From Rank		Passengers From Rank		Average Loading per Job
		Total	Per Hour	Total	Per Hour	
Ashford Road	710	50	4.2	75	6.3	1.5
Bolton Road	655	116	10.6	171	15.7	1.5
Gildredge Road	365	0	0.0	0	0.0	0.0
Pier Head	285	2	0.4	4	0.8	2.0
Railway Station / OOR	755	356	28.3	512	40.7	1.4
Old Town High St	350	6	1.0	6	1.0	1.0
Susans Road	365	5	0.8	6	1.0	1.2
All Ranks	3120	530	10.19	768	14.77	1.4

(d) Level of Use by People with Mobility Difficulty

Rank	Number of Pass'rs Total	Passengers with Mobility Difficulty			
		Wheelchair	Other	Total	%
Ashford Road	75	0	4	4	5.3%
Bolton Road	171	2	7	9	5.3%
Gildredge Road	0	0	0	0	0.0%
Pier Head	4	0	0	0	0.0%
Railway Station / OOR	512	8	7	15	2.9%
Old Town High St	6	0	0	0	0.0%
Susans Road	6	0	0	0	0.0%
All Ranks	768	10	18	28	3.6%

Table 6.5

Rank Survey - Results for Evening (18:00-23:59) Only

(a) Hackney Availability and Incidence of Waiting

Rank	Number of Obsn's	Occasions of Activity	Occasions Taxi Available		Occasions Passengers Waiting		
			Obsn's	% of All Obsn's	Obsn's	% of All Obsn's	% of Active Occasions
Ashford Road	86	1	0	0.00%	1	1.16%	100.00%
Bolton Road	107	6	5	4.67%	0	0.00%	0.00%
Gildredge Road	191	0	0	0.00%	0	0.00%	0.00%
Pier Head	59	1	0	0.00%	0	0.00%	0.00%
Railway Station / OOR	135	122	116	85.93%	20	14.81%	16.39%
Old Town High St	75	9	13	17.33%	4	5.33%	44.44%
Susans Road	13	1	0	0.00%	0	0.00%	0.00%
All Ranks	666	140	134	20.12%	25	3.75%	17.86%

(b) Analysis of Duration of Passenger Wait

Rank	Number of Pass'rs Waiting	Duration of Wait					
		Up to 5 mins	5 mins to 10 mins	10 mins to 15 mins	15 mins to 20mins	20 mins to 25 mins	Over 25 mins
Ashford Road	2	2	0	0	0	0	0
Bolton Road	0	0	0	0	0	0	0
Gildredge Road	0	0	0	0	0	0	0
Pier Head	0	0	0	0	0	0	0
Railway Station / OOR	72	70	2	0	0	0	0
Old Town High St	4	0	4	0	0	0	0
Susans Road	0	0	0	0	0	0	0
All Ranks	78	72	6	0	0	0	0

(c) Level of Hirings

Rank	Period of Obsn's (Minutes)	Jobs (Taxis) From Rank		Passengers From Rank		Average Loading per Job
		Total	Per Hour	Total	Per Hour	
Ashford Road	430	0	0.0	0	0.0	0.0
Bolton Road	535	6	0.7	9	1.0	1.5
Gildredge Road	955	0	0.0	0	0.0	0.0
Pier Head	295	1	0.2	3	0.6	3.0
Railway Station / OOR	675	447	39.7	687	61.1	1.5
Old Town High St	375	6	1.0	8	1.3	1.3
Susans Road	65	1	0.9	1	0.9	1.0
All Ranks	3265	460	8.45	707	12.99	1.5

(d) Level of Use by People with Mobility Difficulty

Rank	Number of Pass'rs Total	Passengers with Mobility Difficulty			
		Wheelchair	Other	Total	%
Ashford Road	0	0	0	0	0.0%
Bolton Road	9	0	0	0	0.0%
Gildredge Road	0	0	0	0	0.0%
Pier Head	3	0	0	0	0.0%
Railway Station / OOR	687	0	6	6	0.9%
Old Town High St	8	0	0	0	0.0%
Susans Road	1	0	0	0	0.0%
All Ranks	707	0	6	6	0.8%

Table 6.6

Rank Survey - Results for Late Night (00:00-03:00) Only

(a) Hackney Availability and Incidence of Waiting

Rank	Number of Obsn's	Occasions of Activity	Occasions Taxi Available		Occasions Passengers Waiting		
			Obsn's	% of All Obsn's	Obsn's	% of All Obsn's	% of Active Occasions
Ashford Road	0	0	0	0.00%	0	0.00%	0.00%
Bolton Road	64	1	0	0.00%	0	0.00%	0.00%
Gildredge Road	82	0	0	0.00%	0	0.00%	0.00%
Pier Head	36	21	11	30.56%	7	19.44%	33.33%
Railway Station / OOR	64	60	42	65.63%	17	26.56%	28.33%
Old Town High St	41	6	3	7.32%	0	0.00%	0.00%
Susans Road	41	3	0	0.00%	0	0.00%	0.00%
All Ranks	328	91	56	17.07%	24	7.32%	26.37%

(b) Analysis of Duration of Passenger Wait

Rank	Number of Pass'rs Waiting	Duration of Wait					
		Up to 5 mins	5 mins to 10 mins	10 mins to 15 mins	15 mins to 20mins	20 mins to 25 mins	Over 25 mins
Ashford Road	0	0	0	0	0	0	0
Bolton Road	0	0	0	0	0	0	0
Gildredge Road	0	0	0	0	0	0	0
Pier Head	37	37	0	0	0	0	0
Railway Station / OOR	75	73	2	0	0	0	0
Old Town High St	0	0	0	0	0	0	0
Susans Road	0	0	0	0	0	0	0
All Ranks	112	110	2	0	0	0	0

(c) Level of Hirings

Rank	Period of Obsn's (Minutes)	Jobs (Taxis) From Rank		Passengers From Rank		Average Loading per Job
		Total	Per Hour	Total	Per Hour	
Ashford Road	0	0	0.0	0	0.0	0.0
Bolton Road	320	1	0.2	4	0.8	4.0
Gildredge Road	410	0	0.0	0	0.0	0.0
Pier Head	180	35	11.7	70	23.3	2.0
Railway Station / OOR	320	250	46.9	456	85.5	1.8
Old Town High St	205	6	1.8	15	4.4	2.5
Susans Road	205	3	0.9	5	1.5	1.7
All Ranks	1435	292	12.21	545	22.79	1.9

(d) Level of Use by People with Mobility Difficulty

Rank	Number of Pass'rs Total	Passengers with Mobility Difficulty			
		Wheelchair	Other	Total	%
Ashford Road	0	0	0	0	0.0%
Bolton Road	4	0	0	0	0.0%
Gildredge Road	0	0	0	0	0.0%
Pier Head	70	0	0	0	0.0%
Railway Station / OOR	456	0	0	0	0.0%
Old Town High St	15	0	0	0	0.0%
Susans Road	5	0	0	0	0.0%
All Ranks	545	0	0	0	0.0%

Table 6.7
Estimated Rank Hiring based on Observed Activity

Hour	Rank							
	Ashford Road	Bolton Road	Gildredge Road	Old Town	Pier Head	Railway Station	Susans Road	All Ranks Total
0500 - 1159	21	4	0	3	0	60	1	88
1200 - 1759	24	77	0	8	4	172	5	290
1800 - 2159	0	18	0	4	0	138	3	162
2200 - 0459	0	1	0	6	26	180	2	215
Average Daily Total	44	100	0	21	29	550	11	755
Estimated Weekly Total	310	702	0	145	206	3852	74	5288

6.20 Though in no sense a key measurement in the determination of whether or not significant unmet demand exists for services, this level of business in isolation from the business which most licenses obtain through telephone or other pre-booking is quite healthy, and a little higher than we have measured in other recent studies.

Passenger Waiting in the context of the 1985 Transport Act

6.20 Passengers were observed waiting at a rank on 140 occasions out of the 607 when passenger activity was recorded. The incidence or chance of having to wait for a Hackney Carriage was therefore 23.06%, significantly above the 10% guide which we suggested in section 3 would be an indicator of significance.

6.21 The *number* of passengers recorded by our sample surveys who had to wait was 394, representing 17.7% of the total number of people hiring Hackney Carriages at ranks during the survey. Of these 394 people:

- 321 (81.5%) waited up to 5 minutes
- 51 (13%) waited between 5 and 10 minutes
- 22 (5.5%) waited for more than 10 minutes

6.22 Of those waiting, therefore, 18.5% had to do so for more than 5 minutes, and 5.5% for more than 10 minutes. The first of these is within the guide value set for significance in section 3 of the report, but the second exceeds the value set.

6.23 Most of the extended passenger waiting occurred during the afternoon, where we would have expected it to happen late at night. In terms of *length* of wait, the relatively small number of occasions when passengers were observed to wait for more than 10 minutes was not concentrated at any one rank.

Level of Confidence in Results

6.24 With any sample survey there is the possibility of random variations in what is being measured. From the rank survey, unmet demand can be measured

either in terms of the *number of occasions* on which passengers wait or in terms of the *proportion* of passengers who have to wait.

6.25 Both are relevant. However, because the latter reflects variations in both the pattern of passenger arrivals and vehicle availability, it is more susceptible to distortion by untypical short fluctuations. Our analysis therefore concentrates on the number of occasions on which passengers had to wait. This is a direct measure of the likelihood of any passenger having to wait.

6.26 Given the size of the survey sample, we can be 95% confident that the values relating to the guidelines we set for significance were in ranges as follows. This is a stringent statistical test and we feel confident, therefore, that the true values lie in this range.

- *Proportion of the time passengers were waiting when there was passenger activity at the rank – 19.7% to 26.4%*
- *Those who wait more than 5 minutes as a proportion of those who wait at all – 14.7% to 22.4%*
- *Those who wait more than 10 minutes as a proportion of those who wait at all – 3.3% to 7.85%*

Conclusion Regarding Direct Demand at Ranks

6.27 In Section 3, we set out guidelines that if two or more of the following were exceeded, the extent of unmet demand would almost certainly, in our opinion, be significant in the terms of the 1985 Transport Act. If the measured values are near to these, we consider the particular circumstances in an area in detail before reaching any conclusion:

- *Proportion of the time passengers were waiting when there was passenger activity at the rank – 10%*
- *Those who wait more than 5 minutes as a proportion of those who wait at all – 25%*
- *Those who wait more than 10 minutes as a proportion of those who wait at all – 5%*

6.28 In this case, two of the measured values exceed the guidelines and this leads towards a conclusion that there is significant unmet demand for the services of Hackney Carriages in the Borough. We must now consider whether or not other factors influence the overall conclusion.

Use of Hackney carriages by People with Disabilities

6.29 During the entire survey, 12 passengers in wheelchairs were seen hiring a Hackney Carriage at a rank. A total of 50 ambulant disabled people made hirings at ranks. This would suggest the demand for Hackney Carriages at ranks to supply specialist services to disabled people is relatively small, but

not as small as for most other studies we have undertaken in recent years. This should be seen in the context that few Hackney Carriages in the town are presently “accessible”.

- 6.30 Our discussions make it clear that the overwhelming majority of demand from disabled people is for a private hire service. Nevertheless, the Council must operate within a legislative and regulatory framework which dictates that Hackney Carriages will normally satisfy this demand. Also, if there is a level of unmet demand more generally, it may be prudent to take what opportunities arise in order to improve the mix of the fleet to meet these particular demands.
- 6.31 Several consultees have made it clear to us that those who require a wheelchair accessible vehicle are sometimes at a clear disadvantage by comparison with the general public in the availability of service to them. At least one of these has specifically raised the point that they would not consider attempting to hire a taxi from a rank in view of the limited chance of there being a suitable vehicle available for hire. These considerations provide further indication of some level of unmet demand, albeit for specialist services, that the Council need to address in its review of policy.

Other Considerations

- 6.32 Before reaching a final conclusion and setting out recommendations, we should consider whether the observations at the time of the study were in any way untypical. Also, are there any indications from the market research surveys that an element of latent or frustrated demand exists due to a perception of poor service?
- 6.33 There are a number of seasonal factors to consider in the pattern of demand for travel in Eastbourne, not only because of the fact that it is a holiday destination, but also because of the large numbers of EFL students attending courses in the town during the summer months. We have taken the view that the study should take place neither when demand is likely to be at its lowest nor during the main summer peak period, and are happy that the results of surveys undertaken during June could not be viewed as untypical.
- 6.34 Most of the rank survey fieldwork was undertaken before the 2006 World Cup commenced, and we are therefore confident that this did not affect the results in any significant way. One survey was done one the day of an England Group match in the competition which coincided with strike action which meant that most of the local buses were not operating, and this was repeated so that the original results were not used.
- 6.35 The hackney trade was aware that a survey was due to be carried out, but the partly covert surveillance, and the pattern of scheduling, mean that we are confident the surveys represent an objective picture of supply and demand at ranks, and we believe that the behaviour of the trade was not abnormal.

- 6.36 It is of course possible that, once word spread that the survey was under way, the overall presence of Hackney Carriages was maximised and was in excess of the norm, but our own supervisory checks and observation do not bear this out. Moreover, the trade representatives we spoke to said they had not been aware that the surveys had been done.
- 6.37 The market research reported some level of service failure in the experience of respondents. 20 respondents said they had sought an alternative having not been able to get a taxi from a rank, though in most cases this related to the late night peak period of demand. Instances of complete service failure were recorded far more in relation to the private hire domain, but again primarily in relation to late night and Bank holiday periods.

Overall Conclusion – Unmet Demand

- 6.38 Overall, we consider that circumstances at the time of the study were reasonably typical and representative. **Our central conclusion is that, in considering the area as a whole, there was *significant unmet demand* in the context of section 16 of the 1985 Transport Act.**
- 6.39 The question may arise as to the **number** of additional Hackney Carriages which would, given reasonable expectations of their pattern of work, cause there to be no significant unmet demand. This would be a *minimum* number, and would not preclude a larger number of licences being issued if the Council were so minded.
- 6.40 Our recommendation, based on the capacity needed to eliminate observed instances of waiting in excess of 5 minutes, is that **6 additional Hackney Carriages** licensed to ply for hire in the Borough would provide the resource required. This assessment does *not* take into account any assumptions regarding future growth in leisure facilities.
- 6.41 In judging the potential impact of an additional licence on the balance of supply and demand, and therefore in arriving at this recommendation, it would be unreasonable to expect that the holder of a new licence would act any more or less effectively than existing licence holders in meeting demand. Our judgement is made given the assumption that holders of new licences operate to the same extent and pattern as existing licence holders. This is a reasonable assumption for the Council to make in determining its policy, but it is not guaranteed that these or any number of additional licences would eliminate or reduce unmet demand at the times or places where we have identified problems.
- 6.42 To produce our recommendation, we use a model which simulates the likely effect, given these constraints, of the operation of additional Hackney Carriages in a given area. In some circumstances this analysis may be referred to as “queue simulation”.

- 6.43 Calibrating the model with vehicle hiring and loading data from the survey, we calculate that to reduce *all* the significant percentage measures of passenger waiting (as shown in tables 6.3 to 6.7) below the yardstick measures we use to indicate significant unmet demand, a very significant number of additional Hackney Carriages would be required.
- 6.44 We would not, however, recommend this as the basis for determining *required* action. As we have said, a fair assessment should consider the licensing area as a whole, rather than individual ranks and times, and recognise the inevitability that some people will always have to wait for taxis at the absolute peak periods of demand.
- 6.45 Given the issues raised by consultees, and the general direction of Government guidance and regulation, there is a strong case for conditions to be applied to new licences so as to improve the mix of vehicles available to serve the needs of people with different requirements, and particularly those with disabilities.

7 CONCLUSIONS AND RECOMMENDATIONS

Introduction

- 7.1 In this section we summarise the key recommendations, and consider how the study results affect the key questions that the Council needs to address in reviewing its policies. The central question relates to the policy of quantity control, but we also consider rank provision and fleet mix.

Quantity Control

- 7.2 In Section 6 we have determined that the study results, if accepted, cannot be used to defend a policy of quantity control under the narrow terms of the 1985 Transport Act, and on the basis of the number of licences currently in circulation. In those terms, the Council is not entitled to refuse applications for new Hackney Carriage licences on the basis that there is no significant demand in the licensing area which is unmet.
- 7.3 The study results indicate, and support the view that **a minimum of 6 new Hackney Carriage licences** should be issued in this context. We consider that this action taken now, assuming no significant unforeseen development in economic activity in the area and subject to monitoring of the position, would allow the Council to justify a policy of quantity control over a period of several years. Comment in relation to the *types* of vehicle that might be licensed follows, from para 7.13.
- 7.4 If the Council wishes to retain a limit on the number of licences, its reasons for so doing should address the *consumer detriment* thought likely to arise from the alternative (that is to say with no limit on licence numbers). As we have said, this requirement arises from guidance given by Government in the wake of the 2003 OFT Market Study.
- 7.5 Possible justifications from this point of view relate to overcrowding at ranks, and problems associated with the economic well-being in the trade and consequent effect on investment levels. To these we can add the possibility that freedom of entry to the Hackney Carriage market could dampen the continued development of the private hire industry. For those who prefer to hire by telephone, or if the charges made in the private hire sector are significantly lower, this could be seen as a detrimental effect.
- 7.6 Trade representatives provided some additional perspective on this issue, citing the possible promotion of a part time culture of operation, as private hire drivers convert to Hackney operation and then come to realise that this does not enable them to earn sufficient income other than at certain peak times of the day and/or week. This could, it is argued, reduce overall availability at other times, and risk compromising standards of operation and vehicles.

7.7 None of the consultees we asked have put forward any arguments in this connection that are essentially any different to these. The key issues that we would put forward, if the Council wishes to retain the principle of quantity control, and to show that it is satisfied that this position is adopted with due reference to the issue of “consumer detriment”, would be:

- The need to maintain a thriving private hire vehicle industry in the town for those who presently derive greater benefit from that service;
- The need to ensure that taxi rank space is sufficient for licensed vehicles to stand when not hired
- The possibility that completely open access to the trade, other than by quality control standards, could reduce or eliminate the practice of double-manning of vehicles, which generally acts to ensure that the vehicles run in this way, at least, are available for hire at almost all times of day.

Taxi Rank Provision

7.8 The research and consultation elements of the study indicate there is no strong justification for new ranks – there is ample rank space in the town at present, and much of it seems under-utilised at present, for one reason or another. Although members of the public have nominated shopping and seafront areas, we are conscious of the fact that ranks that are not in practice used is of no help to anyone, would be an unnecessary cost to the Council, and may well then attract criticism from members of the public.

7.9 As and when the town centre is subject to re-development, the position could and should be viewed differently. Assuming wider Council objectives to encourage less use of private cars for local travel in the area, and assuming that re-generation of facilities will radically increase the attraction of them to local people, it would be a sensible strategy to plan for taxi ranks at that time.

7.10 In the meantime we believe that consideration should be given to the following practical matters:

- An effort on the part of relevant parties, *including the taxi trade*, to “reclaim” the Bolton Road taxi rank for the use of the trade at night;
- Similarly, renewed efforts to establish the trade at the Pier Head for users of the Pier / Seafront. We recognise, however, that the present “head-on” parking design is far from ideal. A two-car “queuing” rank would probably be more effective than the existing arrangement for four vehicles.
- If the rank at Gildredge Road is not going to be used then this rank probably ought to be decommissioned.

- 7.11 In relation to this last, however, we have some concerns at the concentration of business at the Railway Station long after Railway business has ceased at night, and consideration could be given to retaining the Gildredge Road facility as a part time (say 6pm to 6am) rank, coupled to the closure of the west end of the Station rank from midnight to 6am. In the same way that the Old Orchard Road rank is an effective feeder for the west end of the Station rank, Gildredge Road could be an effective feeder for the other Station rank, in the event that there is significant business from very late train arrivals in the town.
- 7.12 Linked to all of this activity, there is scope for improved signing of taxi ranks around the town, particularly with visitors' interests in mind. There is nothing to be gained from directing people to a disused taxi rank, but if some or all of these measures can be addressed convincingly, then signage could help to improve the prospects for trade around the town in the longer term.

Fleet Mix and Services for People with Mobility Difficulties

- 7.13 There are two other specific matters, attention to which could be of benefit to customers in ongoing policy review, being Hackney Carriage vehicle standards and Disability Awareness Training. We have already stated that there is a good case for an increase in the number of "accessible" vehicles available for hire, which could be achieved at least in part through conditions placed on new licences now issued.
- 7.14 Other than this, these matters may not be central to the study brief. Nevertheless, they are issues the Council may wish to address in reviewing policy in the light of the study, or are issues that licensees may themselves wish to consider, from the viewpoint of service improvement and development of taxi businesses. Our views on these, shaped to some extent by the opinions expressed by local residents and other consultees, may be summarised as follows:
- A. There is clear evidence that those who require to use a taxi at certain times of day are unable to do so, particularly if they require that vehicle to accommodate a wheelchair. Vehicle design standards for compliance with the requirements of the Disability Discrimination Act are uncertain, and it is understandable that Councils may not wish to define detailed standards in this respect pending resolution. There have been developments in the design and choice of alternative "accessible" taxis in recent years, however, and we understand that some of these vehicles can bridge the gap between saloon cars and "London" taxis in purchase and running costs. Disabled people generally benefit from a *variety* of vehicle designs within the fleet. This should at least be considered in reviewing vehicle requirements, particularly as we have said for licences issued in the future. Some of these vehicles – a variant of Peugeot Eurobus being just one example - provide capacity for *two* wheelchairs to be accommodated at once, a feature which would improve variety in the fleet still further.

- B. Given the role of the Hackney Carriage trade in providing a service to people with disabilities, we suggest the Council should facilitate and encourage, but probably not require, those in the trade to undertake a reasonable level of basic disability awareness training. For those that have undertaken suitable training, a system of certification could be applied so that organisations and individuals requiring the specialist service would have a point of reference.