Nottingham City Council

Unmet Demand Survey for hackney carriages

April 2023

Executive Summary

This Unmet Demand survey for hackney carriages has been undertaken on behalf of Nottingham City Council following the guidance of the April 2010 DfT Best Practice Guidance document, and all relevant case history with reference 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.

This Report summarises the full body of evidence gathered between September 2022 and February 2023 following the DfT Guidance in place at the time of undertaking and writing (early April 2023, but for the sake of clarity before the new DfT BPG was formally confirmed).

The current fleet of hackney carriages is much depleted from the level pre-pandemic. However, this fleet still covers eight ranks across the city very well and very effectively. This is despite the fleet being around half its maximum size. The level of unmet demand is very low and a long way from being significant.

Main opportunities to develop the service focus around informing people where ranks are and when they are active. It is also important to advertise the difference between hackney carriage and private hire given the high levels of out of town and app-based hires that are occurring. This is a matter of public safety as people in general are unaware of the pitfalls of using any vehicle not licensed by the City and also not particularly well versed in understanding the actual difference between bookings, hailings, taking vehicles from ranks, and use of apps.

The principal conclusion is there is no evidence of any unmet demand that could be counted as significant in terms of Section 16 of the 1985 Transport Act, allowing the Committee to retain the current limit. The limit is currently providing public benefit.

Contents

1 General introduction and background

Licensed Vehicle Surveys and Assessment (LVSA) is a joint venture between CTS Traffic and Transportation Ltd (CTS) and Vector Transport Consultancy. These two companies have hitherto been the two leading practitioners of hackney carriage unmet demand surveys in recent years and who joined forces in early 2017. The combined experience of this joint venture covers in the order of 250 similar studies undertaken since 1999. This is our first survey for Nottingham City Council although we are aware of a number of previous surveys undertaken by other contractors.

Nottingham City 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".

Several sections of the BPG were revised by the introduction of the "Statutory Taxi and Private Hire Vehicle Standards" (STPHVS) document on 23rd July 2020 (see further detail below). None of these resulted in any material change to the elements regarding unmet demand and its review. At the end of March 2022, consultation began on a fully revised version of the BPG, with responses due back by 20th June 2022 but no final date for acceptance of the revised document. An initial review suggested again no material change in the elements regarding unmet demand and its review.

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.

Public Experience

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.

Legislative Developments

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 five most recent reviews were by the Office of Fair Trading in 2003, through the production of the Best Practice Guidance in 2010 (BPG 2010), the Law Commission review which published its results in 2014, the All-Party Parliamentary Task and Finish Group which reported in September 2018, the Government Response in February 2019 leading to a part revision of BPG 2010, and the 2022 consultation on a more comprehensive BPG 2010 review (BG 22). None of these resulted in any material change to the legislation involved in licensing.

Legislative Additions

There have been some actual changes to legislation (not guidance) put in place over recent years.

The Deregulation Act 2015 had two clauses relevant to taxi licensing – relating to length of period covered by licences (Section 10) and allowance of operators to transfer work across borders (Section 11) (both enacted October 2015).

In November 2016, the Department of Transport (DfT) undertook its consultation regarding enacting Sections 165 and 167 of the Equality Act 2010. These allowed for all vehicles capable of carrying a wheel chair being placed on a list by the Council (Section 167) leading to any driver that uses a vehicle on this list having a duty under Section 165 to:

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

Since enactment in April 2017 issues with discrimination have not reduced as much as expected and further change occurred with one of two 2022 Acts put in place (see below).

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.

At the time of writing of this report, no date had still been given for formal publication of the new DfT Best Practice Guidance following the close of the consultation period.

Alternatives to limiting vehicle numbers

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

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

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

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

It must be noted that in many cases application of 'new hackney carriage to be wheel chair accessible' can be used as an alternative to limit policies but one characteristic is that such quality controls have no legal requirement for testing with regard to their impacts.

More recent considerations have added how greater and speedier introduction of more sustainable vehicle propulsion might be encouraged in the licensed vehicle fleets. Air quality zones have also had significant impacts, and in many areas more recently agglomeration of councils has modified overall policies towards licensed vehicles.

Nottingham has had a 'mandatory order' requiring all hackney carriages to be wheelchair accessible (WAV) style since 1995.

Index of significance of unmet demand (ISUD)

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 Authorities. 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 hailing and telephone bookings, latent and peaked demand, wide consultation and publication of "all the evidence gathered".

Unmet Demand Case History

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

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

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

In one case it was made clear the current guidance is based on the 2010 BPG, which supercedes previous notes and DfT advice, 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. In the end a fresh survey was undertaken, finding no unmet demand, but undertaken on the established standards only.

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 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.

The 2010 Best Practice Guidance stated "Most local licensing authorities do not impose quantity restrictions; the Department regards that as best practice." This is restated in the currently draft new Best Practice Guidance.

This new draft Best Practice Guidance also adds para 9.3 quoting "The Competition and Markets Authority was clear in its 2017 guidance "Regulation of taxis and private hire vehicles: understanding the impact of competition" that "Quantity restrictions are not necessary to ensure the safety of passengers, or to ensure that fares are reasonable."

To summarise, the Department for Transport Best Practice Guidance only references 'quantity restrictions' and that not imposing them is regarded by the Department as 'best practice'.

Cross Border and Sub Contracting Implications

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.

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.

The “Protecting Users Statutory Guidance” (now the “Statutory Taxi and Private Hire Vehicle Standards” (STPHVS) was issued in July 2020 for application and advice of such application to DfT by the end of January 2021. Whilst again the taking forward of the wider BPG review is mentioned in terms of a further consultation, exact times for this nor the likely implementation date for this are not given. The April 2010 BPG therefore remains valid for our review.

For completeness, STPHVS seems to require by the end of January 2021 (subject to the continued impact on time resources of the COVID-19 pandemic) the following:

- Making publicly available a cohesive taxi licensing policy document
- Clearly documented ways the licensing authority will share information between relevant stakeholders
- Provision of a robust system for recording complaints that is clearly made known to passengers
- Sufficient training for those making decisions about licence issue
- Clear assessment of option of mandating CCTV in vehicles
- Specific requirements for private hire company records

Coronavirus

The serious Covid-19 virus took hold in the UK during March 2020. Whilst life carried on almost as normal until mid-March of the same year, formal lockdown was applied from Tuesday 24th March 2020 until 24th February 2022 when final restrictions were removed. Significant reductions in movement had begun to bite from the previous week. The last dates in 2020 when on-street and rank surveys occurred in other areas were effectively Sunday 16th March 2020. Up to that point regular review on the three-year timetable had begun to be much more widely accepted.

The licensed vehicle trade was one of a few industries permitted to continue to operate throughout the pandemic and various lockdowns, albeit in a range of different ways due to reduced demand.

The lockdown began to be eased on 13th May 2020 in some sectors, with people encouraged to return to work if they were not able to work from home. Restrictions on outdoor exercise, golf courses, tennis courses and socialising at distance, with restart of construction also allowed. From 15th June 2020, bars, restaurants and hairdressers were allowed to return to a ‘new normal’. The next wave of easement occurred on 4th July 2020.

However, a range of different re-restrictions were applied in various locations as cases began to rise again. Schools were re-opened in September, but a new 'rule of six' was introduced shortly after reducing the ability of people to socialise as rates of infection rose again, together with a 22:00 hours close time for all hospitality venues. In general, new restrictions tended to be introduced with a few days lead in but this ended with a new lockdown from Thursday 5th November2020 ending on Wednesday 2nd December 2020 that year.

After that, new Tiers were introduced (to try to minimise restrictions in parts of the country where the virus was less dominant) and then again another national lockdown was applied from early January 2021 but with the start of vaccinations providing some hope of an eventual overcoming of the impacts of the virus.

As levels of vaccination increased and infection / hospitalisations and deaths reduced, a new road out of lockdown was announced and implemented. The final stage, removal of most English restrictions, was delayed about a month but was finally instigated towards the end of July 2021. The Government focus has since then been on 'coping with the virus' although as Winter 2021 progressed infection levels tended to move upwards.

Later in Winter 2021 appearance of a new variant led to further concern and encouragement to partake in a booster vaccination programme as well as taking further care about interaction. Mask wearing was returned to being a legal requirement at the start of December 2021 in many, but not all of the previous circumstances. The situation around Christmas 2021 was very tense. Working from home was reinstated towards the end of 2021.

Early 2022 saw more confidence that the 'omicron wave' could be survived although in early January 2022 there was pressure on many industries arising from staff isolating. Various methods were being considered to minimise the impact of need to self-isolate. On 24th February 2022 all legal restrictions in England were removed with the focus clearly moving to 'living with the virus' although unintended consequences of rising fuel and other prices from the reopening of the economy were also exacerbated by the current issue of the Ukraine occupation.

During Autumn 2022 there was a high level of COVID infection but the link between infection and serious illness appeared to have been broken, although the need to keep levels of immunity to severe disease may well lead to further immunisation as time proceeds. Another booster injection was starting to be rolled out as part of the vaccination strategy.

Overall, the pandemic led to a significant period of lack of business for both hackney carriage and private hire vehicles, in various ways as the pandemic developed. Some of the impacts of this are discussed in public and driver attitude chapters below, as well as review of impact on demand in the rank chapter. More significant was the reappraisal of many as to their involvement with the taxi industry, and the general job market churn that was instigated not just in the taxi arena. In many areas there is clear knowledge that many who planned to retire brought that date forward whilst others found that the certainty of income from delivery driving was preferable to the vagaries of taxi passenger demand.

Various contract work appears to have remained a constant during the pandemic however (school transport, health transport and so on). However, airports were particularly badly hit resulting in many private hire vehicles being unusable, whilst rail patronage remains reduced with patterns of travel strongly revised towards off-peak travel.

Yet others found the shortage of private hire drivers meant more requirement on hackney carriages in the daytime, in turn meaning they could earn more in the week, and not be reliant on servicing less-preferable customers in the early hours of Saturday and Sunday morning.

A further issue we have observed is that even pubs, restaurants and night venues are now reducing their opening hours or days in reaction to rising costs and staff shortages. This can lead to taxi demand in an area becoming peaky or peakier with such change. This means spikes in passenger demand for licensed vehicles, which is always harder to meet in a timely manner for a given level of vehicles particularly in the later and night-time economy hours?

Further, the impacts of the developing war in Ukraine and other economic changes partly arising from Brexit is again putting pressure on costs of providing licensed vehicle services. Rising fuel prices have also added to the issues, albeit counter-balanced with an increase in fare charges for some authorities. A further knock-on has been change to how those involved in the trade interact with their licensing authorities, with most face-to-face contact effectively removed.

The days when the main aim of a demand survey was checking if passenger demand had changed to see if supply remained sufficient have now been replaced by a much wider research need to identify both demand and supply side changes (such as drivers working shorter weeks, more time by drivers undertaking contracts or diversifying as delivery driverschanged passenger use of ranks and locations arising from matters such as reduced rail travel, etc).

Even long-standing areas with limited hackney carriage vehicle numbers have been impacted by having spare hackney carriage vehicle licences available for the first time in decades. However, our experience suggests that even spare plates and reduced demand can still result in unmet demand increasing as a result of change in the range of elements that need to balance to provide better public service.

Conclusions to this Chapter

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.

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2 Local background and context

Key dates for this Unmet Demand survey for hackney carriages for Nottingham City are:

- appointed Licensed Vehicle Surveys and Assessment (LVSA) in July 2022
- in accordance with our confirmed methodology of August 2022
- as confirmed during the inception meeting for the survey held on 3rd August 2022
- this survey was carried out between September 2022 and February 2023
- On street pedestrian survey work occurred in November 2022
- the video rank observations occurred in mid-October 2022 once the universities were back in full term-time operation
- Licensed vehicle driver opinions and operating practices were obtained by an all-driver on-line survey available from August 2022 to the end of October 2022 (with an extension requested by the Trade provided)
- Key stakeholders were consulted throughout the period of the survey
- A draft of this Final Report was reviewed by the client
- and reported to the appropriate Council committee.

Nottingham City is a unitary City authority. The authority had a population of 323,700 using the 2021 estimates currently available from the 2021 census, just marginally less (3%) than the level from 2018 estimates based on 2011 census data updated, suggesting no real growth in the area in those four years.

In terms of background council policy, Nottingham City is a unitary authority but has a tightly drawn boundary that excludes several suburbs and towns considered part of Greater Nottingham. These are all lower tier authorities with Nottinghamshire County Council the upper tier for those. However, as a unitary, the City is responsible for all transport and highway powers as well as licensing ones although these are split between different departments.

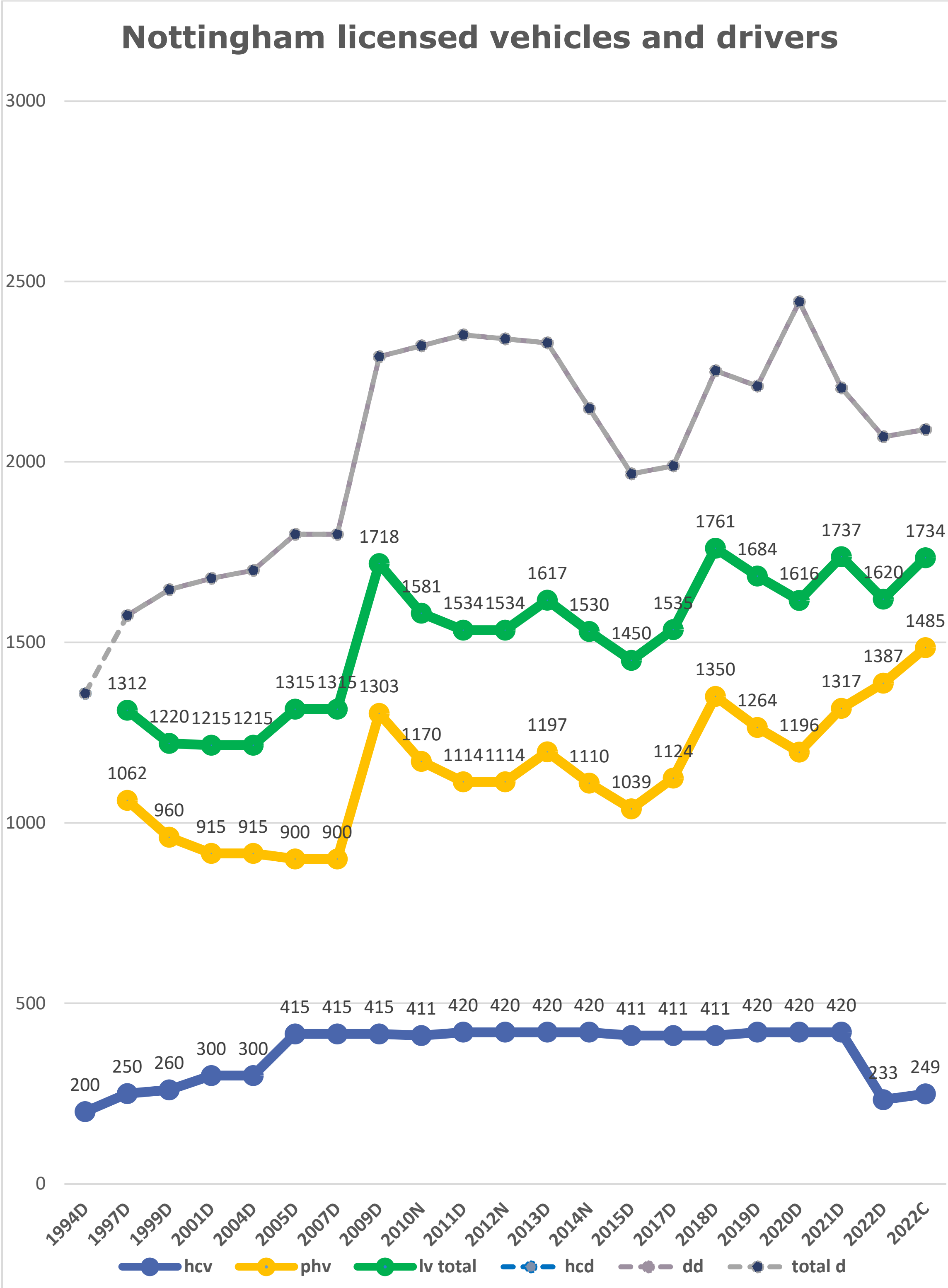
The latest Transport Plan for the City is dated 2011-2026 and though dated April 2011 has seen update last in April 2020, with a set of implementation plans, the latest of which is dated 2019-2022. The City also works with the County authority as necessary.

The nature of the authority means that rank provision is under the jurisdiction of the Council, albeit within the highways section rather than directly within licensing. This should provide better links between licensing needs and provision of the infrastructure in terms of ranks and other highway related needs for licensed vehicles.

The limit on numbers of hackney carriages

However, all licensing authorities have full powers over licensing the vehicles, drivers and operators serving people within their area. The Nottingham City has chosen to utilize its power to limit hackney carriage vehicle numbers, and as far as we are aware has done so since before the introduction of the 1985 Transport Act.

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. Due to the comparative size, the operator figures are shown in the second picture.



Licensing Statistics from 1994 to date

The graph shows that hackney carriages grew in number to reach a level of 415/420 that was maintained from 2004 through to the end of the first year of the pandemic. During that year, numbers dropped to just over half the previous level, and not much more than the lowest ever level. From the date of the latest DfT statistics to the figures at the time of the rank survey, numbers had recovered slightly but were still well suppressed from the previous stable high level.

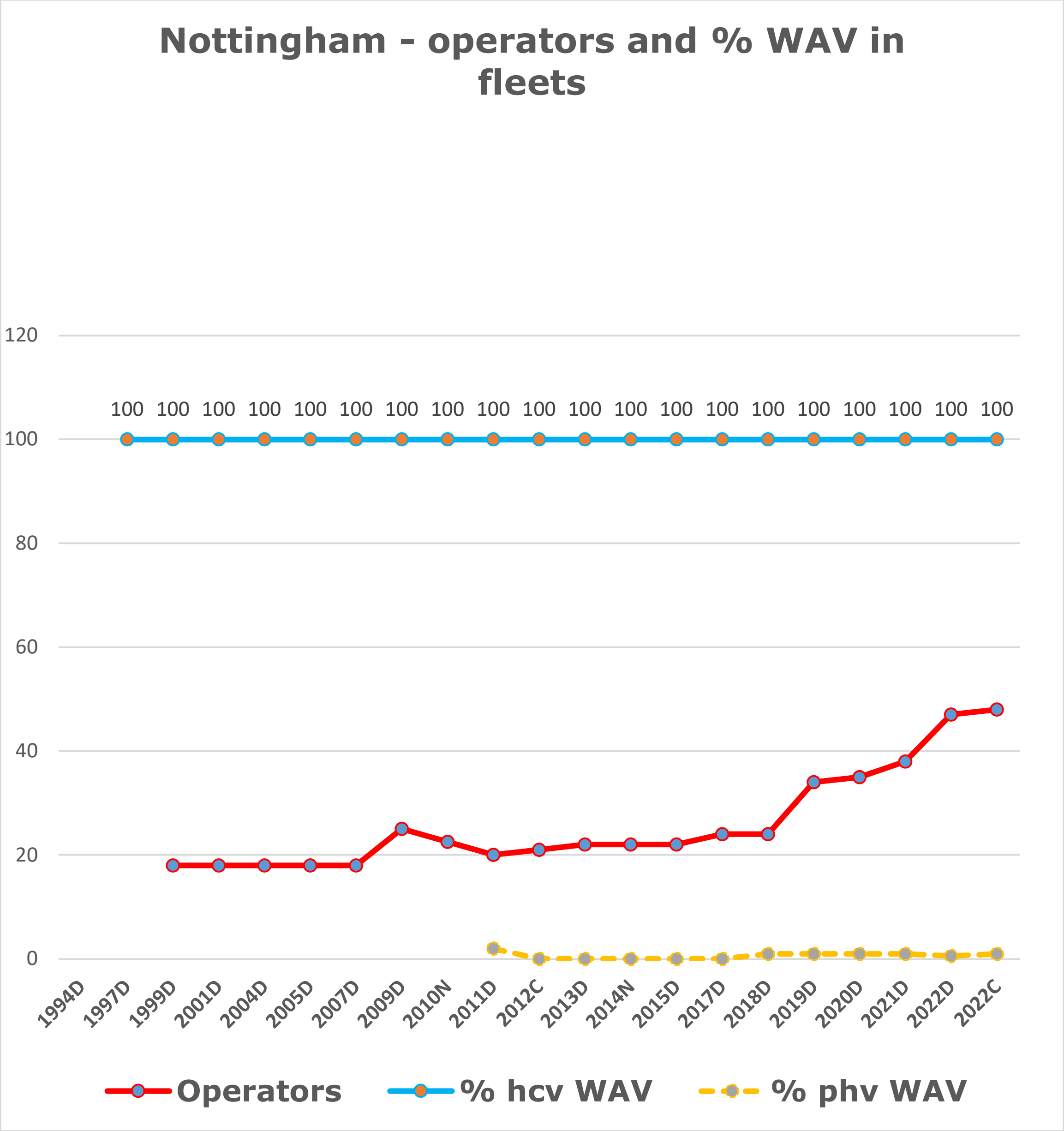
The classic reduction of private hire vehicle numbers appears to match the increase of hackney carriage numbers from 1997 to 2007. There was then a rapid increase after which numbers have tended to see-saw on a four year cycle. The present trend is fairly strongly upwards despite the pandemic, counter to national trends.

There is only one category of driver for Nottingham City, who can therefore drive both kinds of vehicle as suits their needs at the time. Driver numbers had dropped from 2018 to 2019 (before the pandemic) and were rising when the pandemic hit, getting to the highest number on record (2,444). The next two years saw decline of about 200 per year although again the numbers have begun to increase between the formal DfT survey date and the time of the survey.

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. This is not the case for Nottingham.

As already noted, all Nottingham hackney carriages are wheelchair accessible style. The level of WAV in the private hire fleet is minimal, no more than 1%, mainly due to the high level of hackney carriage WAV.

The number of private hire operators has been growing steadily since 2018 with most growth between 2021 and 2022.



Operator numbers and levels of WAV provision in the fleet

National Statistics

In March 2022, DfT published their latest statistics of licensed vehicle numbers by licensing authority. Excluding London, England had 280 taxi licensing authorities. 58, or 21% of these, have 100% fully wheelchair accessible fleets, with Nottingham being one of these authorities. In other words, in terms of wheelchair accessibility, Nottingham is in the top 21% of authorities.

16 authorities had no wheelchair accessible vehicles with the remaining authorities having a 22% average wheelchair accessible fleet level, significantly less than 100%.

Review of limits on hackney vehicle numbers and policy

Nottingham City has maintained a limit on its hackney carriage vehicle numbers and surveyed this on a number of occasions. Records suggest 1988, 1991, 1998, 2001 and 2005 provided formal reports. From that time onwards the authority held the view it was clear there was no unmet demand and did not undertake further formal surveys given its satisfaction on that score.

Vehicle Types

A review was provided identifying the different types of vehicle within the hackney carriage fleet. There were just six different vehicle types at the time of the survey. The largest provided 53% of the fleet. Next largest share was 19%, then 19% (across two models), 4%, 3% and 2%. Of all vehicles, 23% were purpose built electric vehicles (albeit one with a petrol range extender). All vehicles are purpose-built or modified and represent the larger WAV style vehicles. There are five different manufacturers represented.

3 Patent demand measurement (rank surveys)

As already recorded in Chapter 2, control of provision of on-street ranks in Nottingham City is directly under the control of the authority, albeit by the highways section of the Council. Overarching transport policy is also under the council aegis but shared with the Nottinghamshire County authority.

Our methodology involves a current review of ranks both in advance of submitting our proposal to undertake this Unmet Demand survey for hackney carriages 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).

There has been little recent change to City ranks although these have changed since the last recorded formal survey. The pandemic, however, has revised demand and usage of ranks over the period and the results presented demonstrate some of these changes.

Overall survey results

The observations from the rank surveys were analysed and overall estimated weekly levels of demand estimated for each of the ranks. To validate the information and understand current levels against those from the past, information from the previous surveys have also been drawn together and compared where available. The overall results are shown in the Table below with detailed hourly results from the rank surveys available on request if needed.

It should be noted that the previous survey results were principally a sample of the ranks considered to be the main active ranks at the time of each survey. Further, it is accepted that these are much older figures, with the 1988 methodology and results presented different to those presented for 1991 and 1998. The pair of 1998 flows are tests before and after Christmas in 1998. Other flows are from sums of observations in Autumn of the years noted.

The quoted 1988 flows are the total passengers observed during the sample data collection hours for each location; 1991 and 1998 use the same methodology but move forward to taking the total observed passengers and factoring them to an average weekly value.

These were used to drive the decisions regarding levels of hackney carriages based on the ISUD estimates also quoted later in this Report. The information is mainly given to provide an historical record and compare current with at least an appreciation of activity in the past.

Rank	2022		2005	1998		1991	1988
	Pass	%		BC	AC		
Trent St, Station	3856	38					
Midland St, Station				7250	4050	5600	601
Carrington St				3100	2150	2000	169
Wheeler Gate	1554	15.4					
South Parade				11450	8100	9200	1140
Cairns Street						2300	214
Long Row, McDonalds	1550	15.4					
Milton St, Victoria Centre	1428	14.2					
Milton St, KFC / John Lewis	824	8.3					
Milton St (unclear which)				10400	5950	1000	
South Sherwood St, Royal Centre Complex	552	5.5					
Talbot St, Rock City	167	1.7					
Lower Parliament St, Vintage / NG1	150	1.5					
Lower Parliament St, unknown				3500	3000	700	
Friar Lane, Beer Keller	0	0					
Lower Parliament St, Pryzm	0	0					
Burton St, Genting Casino	0	0					
Wollaton St						700	
Night ranks							392
Queens Medical Centre				600	500	800	100
Total estimate weekly	10079	100		36300	23750	22300	2616
From previous survey							

The table suggests that in 2022 there were an estimated 10,079 passengers picked up from hackney carriage ranks across the full licensing area of the City. This came from eight active ranks. There were three ranks expected to see some activity which saw no hackney carriage passengers at all.

This level of passengers is significantly less than the last available values from previous surveys, the most recent available being from 1998, some 24 years previous. There had been apparent growth from 1991 to 1998 and the 1998 survey also included an estimate of seasonal variation by undertaking surveys before and after Christmas. The listing of ranks also suggests significant change since that time so that values are no more than indicative.

Four of the eight active ranks produce 14% or more of total demand. Trent Street, the rank servicing the station, is by far the busiest, with 38% of total estimated passenger demand in a week. Wheeler Gate and Long Row, McDonalds both see very similar numbers in an estimated week, both providing 15.4% of the total. The final rank in this group sees 14.2% of estimated flows, and is the Milton Street rank servicing the Victoria Centre.

The Milton Street rank near KFC / John Lewis sees 8.2% of demand and the South Sherwood Street, Royal Centre Complex ranks some 5.5%. The other two ranks seeing usage are related to night venues, with the Talbot Street Rock City rank seeing 1.7% and the Lower Parliament Street Vintage / NG1 rank 1.5%.

Friar Lane Beer Keller, Lower Parliament St Pryzm and Burton Street, Genting Casino saw no hackney carriage passenger activity in our survey period. Our quick-watch of the Pryzm rank suggested most licensed vehicle activity tended to be away from the rank, into King Edward Street, but this appeared to be mainly booked private hire vehicles. The Burton Street rank appeared mainly to service people being dropped off to clubs in this area, with the main pick-ups here being round the corner in South Sherwood Street.

The graph below shows the overall total passengers across all active ranks in Nottingham over the survey weekend:

This graph shows good levels of demand at most times. Thursday has the overall lowest flows and only moderate levels beyond the 15:00 hour. Friday is busier, both overall but also in terms of seeing a longer period of demand. Saturday grows from a slightly later start and reaches its peak in the 23:00 hour on the Saturday. Only the two hours before this peak also see flows of

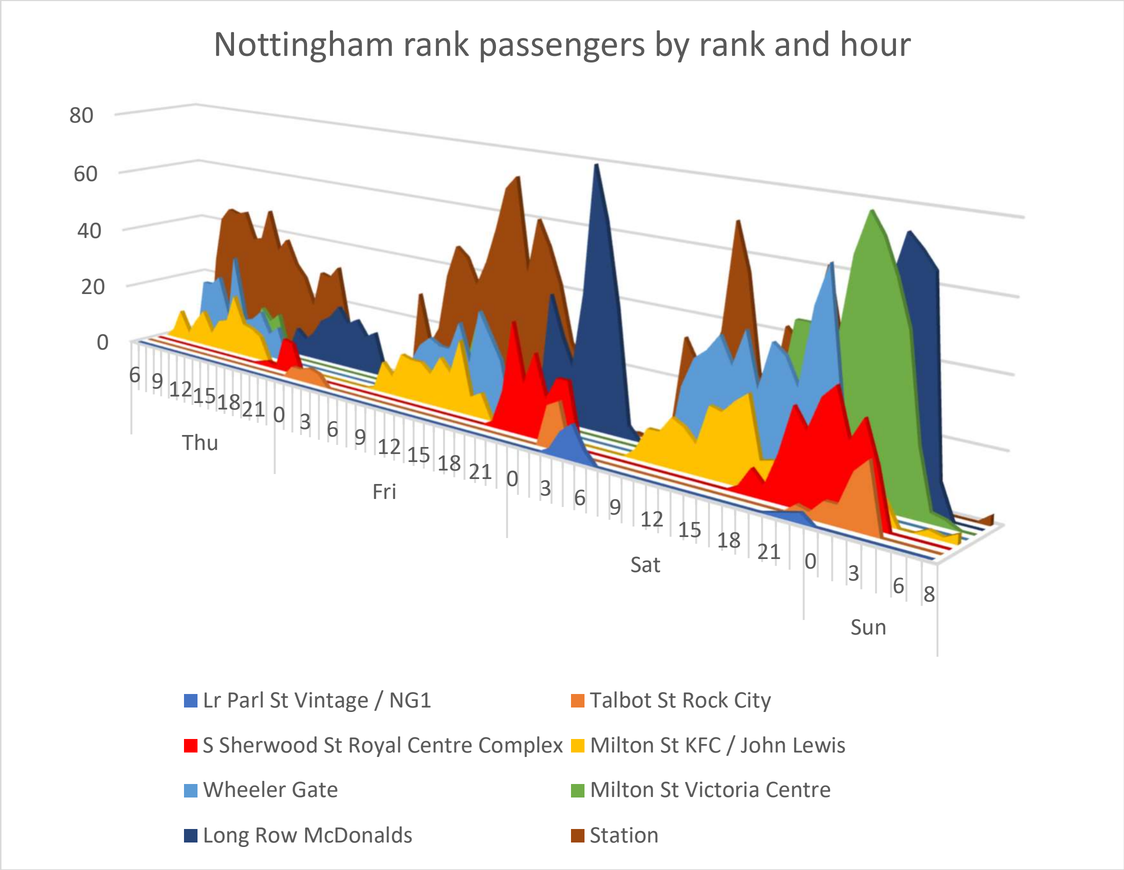
200 or more passengers. There is a second peak in the 02:00 hour although flows continue into the start of Sunday when flows again pick up.

Average passenger flows over 24-hours are 46 Thursday, 71 Friday and 115 Saturday. The overall average flow including the small number of Sunday hours covered beyond 72-hours is 75 passengers per hour. The peak hour flow is just under three times that average.

The values above and the overall graph demonstrate that Nottingham City has a peaky demand profile.

There were just two hours when there were no passengers at ranks across the City – 06:00 Thursday and 06:00 Friday, with no other hour with less than one passenger (Sunday 07:00 saw just one person leaving from a rank).

The all-rank graph is shown below:



The station rank is clearly dominant on Thursdays and Fridays in terms of providing overall passenger numbers to the ranks. It appears much less busy later on Saturday and has no passengers after the 01:00 hour on Sunday morning.

Milton Street KFC appears a mainly daytime rank apart from having some small level of usage later Saturday night into Sunday morning. Wheeler Gate is also mainly daytime but sees much more usage on Saturday and much later.

South Sherwood Street builds usage from Thursdays to Fridays with significant flows on Saturday/Sunday. The Milton Street Victoria Centre rank is very busy Saturday night / Sunday morning whilst Long Row McDonalds rank is busy on Thursdays but much more so on Fridays and grows again for the Saturday/Sunday flows.

The Vintage / NG1 rank contributes some flow on Fridays and Saturdays but a much smaller amount than other locations. Rock City saw flows on all three nights but again grows from Thursday through to the peak on Saturday.

Interestingly the peak flow at 23:00 on the Saturday night is comprised of four almost equal rank location flows plus the larges flow from Milton Street Victoria Centre, although the peak flow there is actually in the midnight hour.

Despite high total flows, the highest number of passengers in any hour at any single rank was 80 people – at the Long Row McDonalds rank in the 02:00 hour in the early hours of Saturday morning. Next highest flow (by just one passenger) was the midnight hour on the Saturday at Milton Street, Victoria Centre.

In terms of the actual observed flows over the surveyed period, the station contributed 34% of all passengers. However, its importance on Thursday was much greater, never providing less than 44% of flows in any hour from 07:00 Thursday through to 23:00 that day. As already noted, on a weekly basis the station provides 38% of estimated demand. Using the latest data, for the year ending March 2022, this is 7% of all passengers leaving the station in a typical week.

Variation of demand

For the observed ranks, the average Thursday flow was 46 passengers, on the Friday this increased 54% to 71, with a further 62% increase to the average of 115 for the Saturday. The highest flow in total was some 223 passengers in the 23:00 hour on the Saturday night. Flows were above 200 for the two hours before.

The Friday peak hour was the 18:00 hour and the Thursday peak the 17:00 hour. The ratio of the overall average flow per hour to the peak is just over three. Overall we would conclude the demand to be peaky, compounded by the spread of demand over a wide set of geographic locations.

Incidence of passenger delay

Taking all the actually observed hours (many with zero flows), there were 324 hours of ranks observed across the survey period. Of these, 10.5% had delays for passengers. Just 2.5% of hours saw average passenger delay of a minute or more (the measure of unmet demand that is significant).

The overall average passenger delay across the full survey period was just four seconds.

The largest average passenger delay value was just under 15 minutes with the actual longest wait for any passenger in that hour 15 minutes. That passenger arrived before vehicles were servicing the Wheeler Gate rank and left on foot. The next highest APD was just under seven minutes with a maximum passenger wait just under 21 minutes. This occurred in the 01:00 hour on Sunday morning at the station. This was at the end of operations at the station and was in an hour when overall passenger flows were very low. The third highest APD was just under 3 minutes, with this and the next two highest APD occurring at Milton St KFC rank. Again they appeared to be related to low flows. Inspecting all the delay hours only two of those APD 1 minute or more were when there were high passenger flows.

For the full survey, there were just four passengers that waited more than 11 minutes (0.07% of all passengers observed), two waited six to ten minutes (0.04%), and 2.3% waited between one and five minutes. This is very low levels of passenger delay.

Further discussion in regard to unmet demand and its significance is discussed in the later chapter.

Other information regarding rank demand

For all the observed hours, the average hourly flow at all sites in total was 75 passengers. There were just two hours with zero flows, the 06:00 Thursday and the 06:00 Friday.

As already noted, the peak flow was 223 passengers in the 23:00 hour on Saturday night, with the peak flow at any rank 80 passengers (04:00 hour Saturday), followed by a flow of 79 in the Saturday midnight hour.

There were three flows of 200 or more, all around the peak flow; and a good number of hours with 100 or more passengers – although the first occurrence of this level was not till the 16:00 hour on the Friday. Flows were 93 passengers per hour or more from 12:00 Saturday right through to the 03:00 hour on Sunday, a sustained period of 16 hours.

Active Plates

A survey was undertaken of active licensed vehicles at five different locations for 1.5 hour periods on each of the three days of the survey. Some 2,628 licensed vehicle plate references were recorded. The sample locations chosen sought to maximise the number of vehicles operating observed and included Trent Stret, Milton street and Lower Parliament Street.

The observations were reviewed and checked to see if they were legitimate Nottingham City hackney carriages, private hire or Rushcliffe vehicles. The hackney carriage and private hire plates for the City both begin from 1 with hackney carriages ending at 618 and private hire at 2161. If a number was noted as hackney carriage but was not a current number, but existed as a private hire, its vehicle type record was amended to PHV. If recorded but not listed as current (but in valid ranges) it was noted as incorrect recording. If beyond the values, it was checked with Rushcliffe numbers and also against Wolverhampton numbers and recoded accordingly.

Due to the busy nature of the locations, in the end 32% of plates could not be recorded and a further 22% could not be confirmed as local legitimate numbers. The remaining plates were 19% Nottingham hackney carriage, 26% Nottingham private hire and small numbers of Rushcliffe and Wolverhampton plates.

The spread of the hackney carriages was reviewed. During the full period covered by the 24 sample hours, 68% of the hackney carriage fleet was observed. 17% were seen on the Thursday (six sample hours), 44% Friday and 38% Saturday (note – the early hours sample for Saturday was included with the Friday total). The table below summarises the proportion of plates seen in each time period (not removing duplicates across periods).

	1300/1430	1500/1630	1700/1830	2000/2130	2200/2330	0000/0130
Thursday	5	6	4	2		
Friday	11	8	22	10	14	8
Saturday	13	7	14	5	11	4

The data shows there are less vehicles active on Thursdays and most on Fridays. During daytime hours, the proportion of the fleet out increases from Thursday to Saturday for the lunch time period. However, moving later on the Saturday, the level of vehicles out later is reduced on the Saturday compared to the Friday. This follows the pattern we are seeing nationally of vehicles and drivers reducing their level of work towards the end of the working week.

It is notable that the level of active vehicles in the early hours of Sunday morning is half the value for the early hours of Saturday. The highest level of activity is Friday evening – although this does partly match one of the peak periods for passenger demand. The lower levels late afternoon may be symptomatic of vehicles servicing school contracts.

It must also be remembered the above are for sample hours and locations but they do seem to provide a realistic picture.

Other vehicles at or near ranks

Some 15,426 different arrivals, departures or comments were identified during the observation of the videos. 73% of these were identified as vehicle arrivals or departures. Of these vehicle observations, 65% were wheelchair accessible hackney carriage movements. There were 7% of the movements identified as private hire vehicles, with 1.6% goods vehicles, 0.6% emergency vehicles and 23% private cars. 2.8% were identified as being out of town licensed vehicles of some description.

The highest proportion of vehicle movements were identified at the station rank (28%) followed by Rock City (14%), Long Row McDonalds (13%), Milton Street Victoria Centre (12%), Sherwood Street (12%) Wheeler Gate (10%), Milton Street KFC (10%) and finally Lower Parliament St NG1, just 3%.

In terms of private car abuse, the worst locations were Rock City (57%) – which also had a high level of private hire and out of town licensed vehicles (13%), Sherwood Street (39%) and the Station (23%). All others saw 14% or less of vehicle movements being private cars. This does suggest people, as around the country, had got used to parking in ranks during the pandemic when less used, which now needs action for public safety. However, the Rock City location is a very busy site when the club is operating, with the rank tending to take almost one of the two available lanes, with people generally entering all kinds of vehicles in that vicinity.

Use of ranks by those with disabilities

During the period of observation, there were 9 observations of people in wheelchairs accessing hackney carriages. Six of these were at Wheeler Gate, two at the Station and one at Milton Street Victoria Centre rank.

There were 71 other observations of people with disabilities being assisted into vehicles – 39 at Milton Street KFC, 14 at the Station, 10 at Wheeler Gate, six at Milton Street Victoria Centre and one each at Long Row and Sherwood Street.

These are good levels of usage of licensed vehicles by those with visible disabilities.

Summary

Hackney carriages are providing a good level of service across the city centre rank locations although night demand generally seems to see higher levels of competition from private hire, out of town vehicles and people using their own vehicles or getting lifts from friends.

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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. We interviewed more males than the census suggested (49% compared to 51% in 2021 census), less under 30's (24% compared to 37% census) and over 55's (20% compared to 26% census) and correspondingly more 31-55's (55% compared to 37%). However, the variation should not bias the sample unnecessarily.

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, 196 people were interviewed in various parts of the city centre. 36% were near the railway station, 33% near the bus station and the remainder spread between Market Square, Clumber Street, Lower Parliament Street and Milton Street. 90% of those interviewed said they lived in the area. Of those not from the area there was no particular place with a large share of those named.

Of those interviewed, 79% said they had used a licensed vehicle in the last three months in the area. However, when considered in terms of which type of vehicle, just 3% overall said hackney carriage only, 11% by both hackney carriage and private hire and 65% by private hire only.

Most people told us how often they used licensed vehicles, providing an estimate of 1.0 trips per person per month. However, when the question was asked about hackney carriage usage, as is normal the overall value was much lower, 0.2, or 20% of the total of trips made by licensed vehicles overall.

In terms of visibility, the hackney carriage fleet was well known, with just 2% of those responding to the question saying they could not remember seeing a hackney carriage in the Nottingham area. However, a higher 73% of people said they could not remember when they last used a hackney carriage, a matter of choice.

For all licensed vehicles, the most frequent quoted level of usage was once or twice a month, for 29% of those responding. 15% said they never used licensed vehicles. For hackney carriages the most frequent usage levels were equally shared between once or twice a month and once or twice a year.

Across all those who responded (with some multiple responses), 43% said they got a licensed vehicle by telephone, followed by 33% using an app, 14% using a rank, 6% using a freephone, 3% hailing and 1% 'googling'. The 17% attributed directly to hackney carriage are similar to the estimate of 20% from the frequency of usage.

When asked about companies they phoned for licensed vehicles, 71% of people gave at least one company. 54% named two companies, 31% three and 15% just a single company. There were 12 different names given. The top company gained 31% of votes, the second 23%, third 14% and fourth 12%. The others gained 7%, 4%, 3%, 2% (twice) 1% (twice) and one with just one quote. The second and fourth were national app companies who between them took 35% of mentions. That level is consistent with the 33% of responses that were people getting vehicles by app.

The top four companies named accounted for 80% of all mentions made of company names by respondents.

31 different names were provided regarding locations of ranks in the area by 67% of those interviewed. Many people mentioned multiple suggestions, with a total of 221 different mentions provided. Of these, 24% stated that they used the location and 76% that they did not. 10% told us three locations, 48% two and 42% just one.

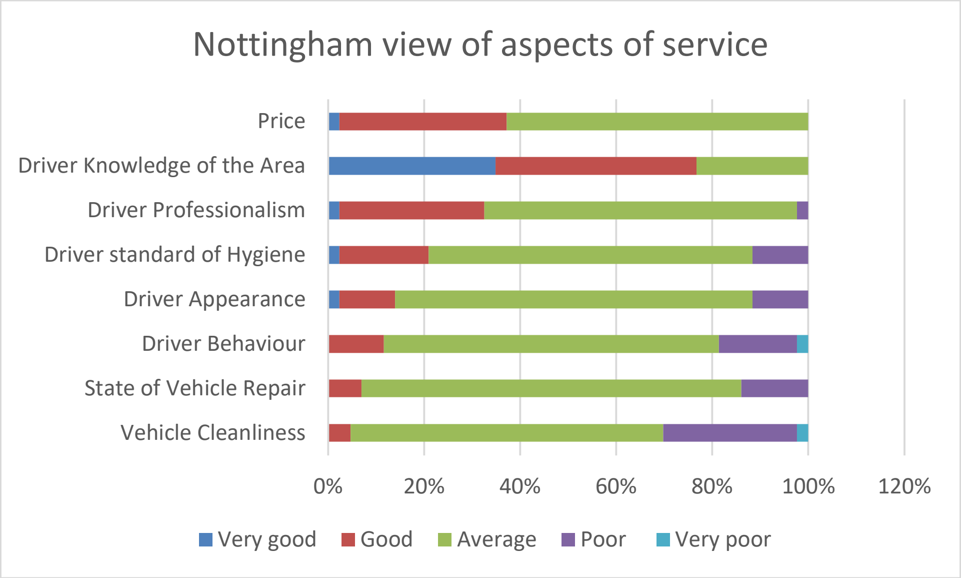
Only the station rank gained more than 9% of total mentions – gaining some 47% including a small proportion calling it Trent Street. 9% said Parliament Street but it was not clear which of the ranks that referred to. 7% said Victoria Centre, which could be either of the Milton Street ranks, with 3% more saying Milton Street or the Halifax rank. 5% said bus station, but again this is not clear as there are two bus stations and neither directly has a rank. 4% said Market Square which is Long Row West. 3% named Talbot Street (Rock City). Pryzm gained 2% and Victoria St 2%.

Some of the quoted levels of usage of places named were low. Only 16% said they used the station rank. Other larger proportions were for lesser quoted locations, such as 'Wellington Circus' (North Circus St) which was quoted by three people, two of whom said they used it. Eleven of the locations quoted saw people say they did not use them, including some active rank locations (e.g. Market Square)(Long Row West).

All other references were three or less people. Some were not rank locations, such as the Hospital or University, whilst others were colloquial names or names of where the rank was near.

This suggests a lack of clarity of both where ranks are, and what they are really called.

People were asked to rate their views of the licensed vehicle service provided. Overall, of all those interviewed, just 22% provided their views. The graph below summarises their views:



The overall pictures suggests people view the service provided as average. The only exception was driver knowledge which saw its top score 'good' with 35% saying 'very good'. Price notably obtained no poor or very poor scores and 35% good, with 2% saying 'very good'.

However, there are very few 'very poor' scores. These were just two single votes, one concerning vehicle cleanliness and the other driver behaviour. On the other hand, 'poor' scores were relatively high, particularly for vehicle cleanliness, state of vehicle repair, and the three aspects related to drivers.

Eleven people provided negative comments, which in essence quoted poor experience of drivers, several wanting more environmentally friendly vehicles and one complaining that 'some taxis were too stinky at weekends'.

As is usual for these surveys, a much higher proportion were willing to tell us matters that might encourage them to use hackney carriages, or use them more often. Some 184 responses were obtained, many being multiple responses.

Of the total responses, the top reason was “if they were more affordable” – 46%, followed by more hackney carriages that people could phone for (28%). Vehicle quality scored 11%, driver quality 10%, a screen between passenger and driver 4% and more hackney carriages at ranks or to hail just 1%.

69% of those responding said they did not need, nor know anyone who needed a wheelchair or other adapted vehicle. This suggests relatively high need for adapted vehicles. Of those needing, or knowing someone that needed an adapted vehicle, all favoured WAV.

The latent demand factor, identified by asking if people had ever given up waiting for a hackney carriage at a rank in the City, obtained just six people saying they had given up waiting. Five of these were actual active ranks giving a rank latent demand value of 2.6%, not high. Further, most said this had been some while ago with only one stating ‘last month’. Half said they walked away and hailed with the other half phoning for a vehicle.

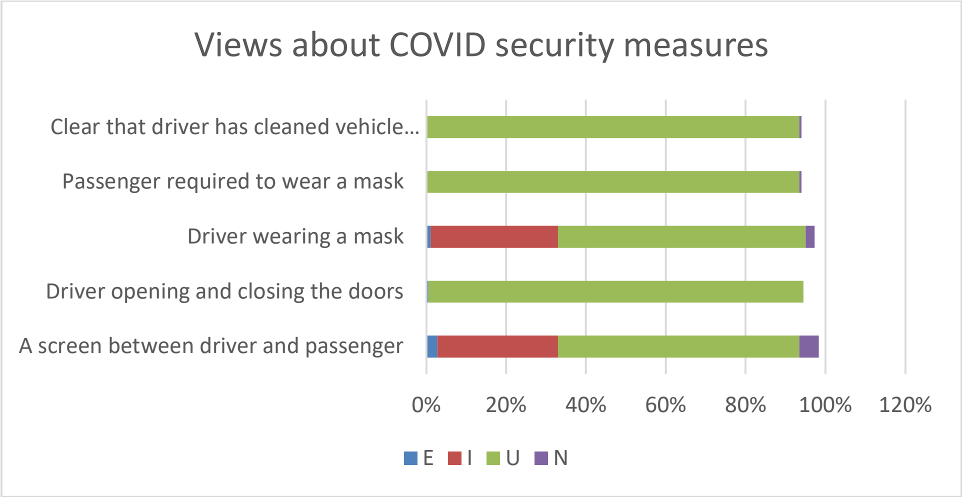
When asked what they did after leaving the rank, 57% said they went on to book a vehicle whilst 43% said they walked away from the rank and hailed a vehicle on their route home.

When asked if they felt there were enough hackney carriages across the area, 94% said there were and just 6% said they felt there were not. No-one said they did not know and nearly all answered this question.

People were asked how they felt their use of licensed vehicles would change from the time of the interview to the same time a year hence (i.e. by November 2023). 64% said they expected to use both vehicles about the same. 31% said they would use private hire vehicles more, but 1% said less. 4% said they would use hackney carriages more, and 1% less. This suggests some marginal growth in hackney carriage usage, but a lot more usage of private hire.

Covid impacts

People told us the measures they felt were important to them with reference to the pandemic. The graph below shows the responses: (it should be remembered this was asked before final relaxation of all restrictions occurred)



Key: N – not important, U – Useful, I – Important, E- Essential

These results suggest COVID security measures are now almost forgotten about. Only a screen and drivers wearing a mask are anything other than useful, with drivers wearing masks having the highest important score, but at only 33%. Need for a screen was counted as essential by the highest proportion – but just 3% of respondents. However, the focus is that the issues remain 'useful' not completely unimportant.

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. Appendix 6 lists those consulted.

Our information was obtained by telephone, email, or letter as appropriate. The list contacted includes those suggested by the Council, those drawn from previous similar surveys, and from general internet trawls for information. Our target stakeholders are as far as possible drawn from across the entire licensing area to ensure the review covers the full area and not just specific parts or areas. An on-line survey form was circulated by Facebook and by direct email where possible. It was also included in several contacts made using on-line forms from different locations.

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.

Further, the element of key stakeholder contact has become much more difficult following the pandemic, with many not providing phone access and others advising only personal contacts will be dealt with, and then only if directly meeting sales-based questions and those from actual customers not general groups. In many cases, only Facebook general contact is possible.

However, it must be remembered that none of our consultation is statutory and for cost effective and fixed budget reasons we limit our attempts to contact people generally to a first attempt and reminder. Further, if there are issues, key stakeholders would generally contact the council and if there were issues would avail themselves of opportunity to comment.

Online responses
One response was received, from a night club (see below).

Supermarkets
No comment was obtained from any supermarket.

Hotels
No hotel responses were received.

Public houses
Several pubs were contacted but had no comment.

Night clubs
One night club told us their customers or staff used local licensed vehicles, contacting them using their own mobile phones. They were aware of ranks that could be used. However, they told us most of their customers used a large app company. They did not get any complaints from customers.

Other entertainment venues
No response was received.

Restaurants
Several restaurants were contacted but had no comment

Hospitals
One hospital contacted provided no comment about the service.

Police
The police made no comment regarding the service.

Disability
A more detailed questionnaire for those needing assistance in using licensed vehicles was undertaken and results are provided in a separate chapter below.

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.

Some contact was made by drivers seeking extra time to complete, but in the end no additional responses were received from either source.

A check was made to ensure there were no duplicate entries or any evidence of attempting to skew the survey. No duplicate entries or concerns were raised about the responses. For this survey, there was a 14% response rate from hackney carriage drivers, a large 71% response from private hire, 11% from those saying they did not drive and one person (3%) saying they drove both hackney carriage and private hire.

However, the 35 responses are less than 2% of the total driver population for the City.

69% of those responding said the licensed vehicle trade was their only or main source of income. 11% said they worked part time with no other sources of income, 9% were part time workers but with other sources of income and a similar 9% (three people) said they were not currently working in the licensed vehicle trade but would be returning when demand increased. There was one response (3% of the total) who said they were not currently working and did not plan to return.

When asked about the kind of work normally undertaken, some gave more than one response. Of the total, 19% of the respondents said they normally undertook immediate hire work from ranks. 40% undertook immediate hire via bookings and 30% advanced hire work. 2% (one respondent) undertook chauffer or corporate and 9% principally undertook contracts.

In terms of how long respondents had been driving or operating a licensed vehicle in Nottingham, the average was just over 8 years with a maximum quoted of 33 years. On average those responding had worked just under five days, and 36 hours; with maximums quoted of seven days and 90 hours. The most frequent number of days worked was six (29%) followed by seven (23%) and five (17%).

85% said they owned their own vehicle. 12% said someone else drove the vehicle they drove at some other time. This was mainly in the daytime (50%), in mornings (25%), or other times (25%). For those saying no-one shared their vehicle, 3% said this had changed from pre-COVID times, suggesting little increase in sole use of vehicles.

77% said they accepted pre-bookings. 36% of those responding said this was from a private hire company. 14% said by phone, with 50% through an app.

The top rank drivers said they serviced was Trent Street / Station with 30% saying this location. 24% said Milton Street, 18% Wheeler Gate and 12% Angel Row – with three others naming locations we were not able to find.

39% said their most frequent way of getting fares was from phone, 29% from an app, 20% from rank, 10% from hailing and 2% from school contracts. This reflects the higher level of response from private hire.

The most frequent issue affecting when people worked was 35% saying they worked around family commitments, 29% worked when most passengers were around, 18% around 'traffic' (but not saying if this was avoiding traffic or working when it was busiest), 12% said they did not work nights but 6% said they focussed on night work.

36% felt rank work at the time of the survey compared to three years previous was reduced, with 29% suggesting levels were the same and 36% feeling it had increased.

The level of bookings response suggested 43% felt this had reduced, 30% that it was about the same and 26% that it had increased. These responses suggest ranks have been more resilient in Nottingham, not the national trend.

47% were aware of drivers that had given up due to the pandemic. Half of the responses were saying they knew of between 1 and 5 drivers, with a further 14% between six and ten. One person said they were aware of about 300 that had given up.

Most said that the pandemic had reduced demand significantly although a few said demand had returned by the time of the survey. Several said customers were still not going out as much.

Thoughts for the future were generally pessimistic. Some mentioned the large number of out of town vehicles.

70% felt there were more than enough hackney carriages in Nottingham at this time. 7% felt there were not and 23% were not sure.

64% felt the limit on hackney carriage vehicle numbers should be retained, with the remaining 36% disagreeing.

In terms of reasons for retaining the limit on hackney carriage vehicle numbers a few gave reasons including minimising congestion and pollution, more work for the current drivers and safer drivers. Several said they did not think there was a benefit.

Many took time to make extra comments, the bulk of which commented about out of town vehicle volumes. Another said one night club area no longer provided much trade for hackney carriages as most was taken by private hire, mostly out of town. They pointed out that private hire used the rank and did not allow hackney carriages to use it at all.

The questionnaire offered the opportunity for respondents to tell us how often they got customers needing to travel in wheelchairs from a rank, bookings and contracts. The results are shown in the table below (in chair first / transfer second):

	Never	Once a year	Once a month	Weekly	Daily
Rank	38/22	15/11	31/44	8/0	8/22
Bookings	18/24	18/24	32/19	14/19	18/14
Contracts	80/33	0	0/33	0	20/33

18% said they never had any wheel chair trips from a rank with 22% not having transfer trips from a rank. Generally higher percentages obtained wheel chair fares from bookings, although the level transferring tended to be lower. 8% said they got daily wheel chair jobs at a rank, but 22% said similar jobs that transferred. 31% of wheel chair trips at a rank were monthly, with 44% at ranks for those transferring. These figures appear unusual given the fleet is fully wheel chair accessible.

7 Disability Review

For this survey, a questionnaire regarding passenger need for people considering they had a disability or were regularly helping someone with need for adapted vehicles was made available for the council to distribute to relevant persons. Just one response was received.

The 20-39 year old person said they used hackney carriages once or twice a year and private hire once or twice a month. Their principal conditions were autism, communication and long standing health issues. They said they would need a text message to confirm vehicle arrival, require the vehicle to arrive exactly on time and not be late. They did not feel that hackney carriage or private hire drivers took any reasonable steps to assist them when travelling and that some vehicles had too high steps for them to use easily.

They were most likely to call a friend or family member for help if they were not able to find a suitable hackney carriage when needed. They were generally unable to get a private hire vehicle when they needed one. If a booked private hire did not turn up, they would not attend their activity or appointment. They said they had been made to feel uncomfortable by a taxi driver due to their disability. Positive suggestions were need for disability awareness, better use of smartphone apps, higher levels of council enforcement.

Despite their comments, they felt that the overall level of service provided by Nottingham City licensed vehicles was satisfactory.

Although only a single response this does provide some insight and clearly shows need for further work in this regard.

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8 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.

ISUD values

The values from the ISUD calculations from the current survey are provided below.

ISUD component	2022	2005	1998	1991	1988
Average passenger delay (mins)	0.07		1.6	0.55	
Off peak queues	13.64		36	8	
Overall delay proportion	1.61		21	8	
Peakiness factor	0.5		1	0.5	
Seasonality	1		1	1	
Latent demand factor	1.026		n/a	n/a	
Overall ISUD factor	0.75		1210	18	
ISUD is value of 80 or more		Halcrow	TPi	*TPi*	*(Leeds)*

The 2022 estimate of the significance of unmet demand shows a very low level of unmet demand, which is a long way from being significant. This is very telling given that the fleet is now much smaller than it has been for many years.

Average passenger delay is just four seconds, 0.07 minutes. The largest component of unmet demand is queues of people in the off peak. The level of delay when there is a minute or more average passenger delay is small, at just 1.61% of hours. Latent demand is also low.

Comparison to much earlier surveys shows the current situation is much better service levels than in previous surveys for which results exist. Only off peak queues are worse than the 1991 result. This is normally due to hackney carriages working on private hire circuits.

What is clear, however, is that there is no unmet demand that can be counted as significant at this point in time.

9 Summary, synthesis and study conclusions

This Unmet Demand survey for hackney carriages on behalf of Nottingham City has been undertaken following the guidance of the BPG and other recent case history regarding unmet demand and its significance. This Chapter provides a summary of each of the previous chapters, draws the key facts together and then provides conclusions regarding the study. Recommendations follow in a separate Chapter. It has been written in early March 2022 under the various requirements and background as at that point in time.

Background and context

This report summarises the body of evidence gathered between September 2022 and February 2023, following our proposal of August 2022. Nottingham City is a unitary authority but also works closely with Nottinghamshire County Council given that the authority serves a much wider hinterland than that purely contained in the City boundaries itself.

The latest Local Transport Plan was updated last in April 2020 with implementation plan dated 2019 to 2022.

Hackney carriage vehicle numbers were just 200 when the first DfT survey of numbers was published. Identification of unmet demand led to numbers growing to around 415-420, a level maintained from 2004 to the start of the pandemic. The first pandemic year saw a dramatic fall, halving the number of hackney carriage vehicles, with only modest recovery to the time of this survey.

Private hire vehicle numbers followed the classic pattern of reduction as hackney carriage plates grew from 1997 to 2007. Current growth appears to be on a four year cycle with growth appearing to continue despite the pandemic with growth still occurring up to the time of the survey. It should be noted that these figures exclude any out-of-town vehicles which are believed to operate in modest numbers in the area.

The area has long had a dual-driver only category so that any driver can drive any vehicle as they see fit. Driver numbers were reducing ahead of the pandemic but then rose, but saw two years of decline through the pandemic but more recent increase.

Operator numbers have been growing since 2011.

The hackney carriage fleet has long been fully wheel chair accessible whilst the very small number of WAV vehicles in the private hire fleet is very slowly increasing. This places Nottingham amongst the 21% of licensing authorities that have such fully WAV fleets (as at March 2022 DfT statistics).

Nottingham City Council last formally had an independent unmet demand survey in 2005, with previous revies in 2001, 1998, 1991 and 1988. Between the latest survey and now the authority believed there was clearly no unmet demand and did not consider any requirement for testing that independently.

A review of the type of vehicle in the hackney carriage fleet found the largest vehicle type made up 53% of the fleet. Next largest type saw two vehicles with 19% each. 23% were purpose built electric vehicles. All vehicles are larger WAV style and see five different manufacturers and just seven different models.

Rank observations

The city centre has seen significant change in recent years, not least the total revision of the provision of hackney carriages to the rail station location. Further, there are no known ranks beyond the confines of the city centre and several long disused ranks in the outer parts of the city centre area.

Our current estimate of the total number of passengers boarding hackney carriages at ranks in the City from the surveys undertaken is 10,079 for a typical week. The surveys were undertaken when the University was in full operation and therefore should provide a typical level. The average occupancy over the surveyed hours was 1.7, suggesting around 5,900 actual fares represented.

Passengers were spread over eight ranks. Trent Street, servicing the station, has the highest share at 38%. Wheeler Gate and Long Row are next with just over 15% of passengers each, with Milton Street Victoria Centre rank having 14%. This means the top four ranks provide 82% of passengers. The next two busiest ranks are Milton Street KFC (8.2%) and South Sherwood Street with 5.5%. Two night ranks remain used by hackney carriages with Talbot Street Rock City with 17% and Vintage / NG1 1.5%. Three other ranks expected to see custom were not used in our observation period. In one case the main demand appeared to be met by private hire pick-ups in a different location to the rank, but closer to the exit.

The City sees good level of hackney carriage rank-based demand at most times. As is typical around the country, Thursday flows (average 46 per hour) increase to Friday (71) and again to Saturday (115). The ratio of peak flow to overall average is just under 3 and this together with the profile suggest demand in Nottingham is ‘peaky’ (which militates against ability of the fleet to meet demand). During our survey period just two hours saw no passenger leaving any rank across the City.

Both Milton Street KFC and Wheeler Gate are mainly daytime ranks. Apart from the station, all other ranks focus on night time demand. The peak hour for demand in our survey was 23:00 Saturday with 223 passengers. However, the peak flow in any hour at any rank was 80 passengers. The Saturday late peak was made up of almost equal flows from four ranks. Friday peak was the 18:00 hour and Thursdays 17:00.

With respect to passenger delay, there were 10.5% of observed rank hours with average passenger delay, reducing to 2.5% for those travelling in hours when average passenger delay is over a minute. Overall average passenger delay was just four seconds. Many of the hours with delay were when the overall level of passenger demand was low.

Our plate sample survey covered five locations on all three days of the survey. All vehicles that appeared to be hackney carriage or private hire were recorded and the numbers validated against the current Nottingham City plate list. Any invalid plates were then cross-checked against both Rushcliffe and Wolverhampton vehicles, two authorities known to have significant number of vehicles observed in Nottingham. The locations chosen were near but not at ranks and designed to minimise chance of the observer being noticed. However, this also meant it was harder to read values, and in the end 32% of vehicles were not observable. A further 22% were not confirmed as being legitimate plates of any kind.

Of the total observations, 19% were Nottingham hackney carriages, 26% Nottingham private hire, plus small percentages of both Rushcliffe and Wolverhampton plates. As already noted, observations were not at ranks so some of the Rushcliffe vehicles particularly could be on legitimate jobs.

68% of the active hackney carriage fleet was observed over the three days. In terms of proportions of the fleet seen, most plates were observed on the Friday (44%). When specific periods were reviewed, the most plates were seen on the Friday around evening peak – 22%. Apart from the early afternoon Saturday there were always more plates out and about on the Friday compared to the Saturday.

A review was undertaken covering all the rank-based observations. Of all the observations made, 73% were vehicle arrivals and departures. Of the vehicle movements 65% were hackney carriages. 7% were private hire but 23% private cars. Just under 3% were out of town licensed vehicles of some description.

28% of all vehicle movements were observed at the Station rank. Six other rank locations saw between 10% and 14% of movements with the final rank just 3%. The location with the worst level of non-hackney carriage use was at Rock City where 57% of movements were private cars plus 13% out of town private hire. Sherwood Street saw 39% cars and the station 23%. This mirrors the national issue with private parking using ranks that people often found empty in the early part of the pandemic and have continued to assume they can now use.

Nine people were observed over the three-day observation period accessing hackney carriages in wheel chairs, two thirds being at Wheeler Gate. There were 71 cases of people observed being assisted into vehicles mainly due to their disabilities.

The rank work confirms that hackney carriages are providing a good level of service across the city centre rank locations although night demand particularly is seeing higher levels of competition from both private hire and out of town private hire.

On street public views

On street interviews were undertaken with some 196 total responses. The sample was compared to general information from the initial results of the 2021 census and found to contain marginally more males, less under 30's and over 55's and more of the intermediate age group than the census. 90% said they were from the area.

This survey found a quoted level of recent usage of licensed vehicles at 79%. Of these just 3% said they used hackney carriage only, 11% by both and 65% by private hire only. The remaining 21% said they did not use licensed vehicles at all.

An estimated 1.0 total licensed vehicle trips are made per person per month, falling to just 0.2 trips per person per month by hackney carriage. These are both low values.

The hackney carriage fleet remains highly visible to respondents (just two percent of those responding could not remember seeing a hackney carriage in the area, although some 73% could not remember when they last used a hackney carriage.

Quoted rank usage at 14% together with stated hail levels of 3% were in the same order as the 20% share for hackney carriages based on quoted usage. A third said they got vehicles using an app and 43% by phone.

In terms of quoted private hire companies contacted, 54% named two companies. There were 12 different company names given with the top one gaining 31% of votes and the second 23%. The second and fourth largest percentages, totalling 35% between them were national app companies – a value that matches closely the quote of 33% of people getting a vehicle using an app. The top four quoted companies took 80% of all mentions between them.

People were aware of a lot of ranks (some 31 different names), but only 24% of those mentioning ranks saying they did use the ones they had named. 48% named two ranks. Only the station rank gained more than 9% of mentions, gaining some 47% - but only 16% of these said they used it. There appears to be a lack of clarity in the public view of where ranks are and what they should be called.

22% of people responding gave us their views of the licensed vehicle service provided. The overall picture is that the service is viewed as average. Driver knowledge however saw 35% saying this was very good. On the opposite side there were very few very poor scores.

The top reason, as usual, that would encourage more use of hackney carriages was if they were more affordable (46% of responses), with 28% saying if they could phone for hackney carriages. Having more hackney carriages at a rank only scored 1% of all mentions – insignificant.

The level of demand for wheelchair or adapted vehicles appeared to be fairly high, with the focus being on WAV style.

The formal latent demand factor of 1.026 is low. The score for there being enough hackney carriages was 96%.

Key stakeholder views

As with most recent surveys, obtaining views from key stakeholders proved unfruitful despite increasing effort to obtain response. The only response was from a night club who said most customers used an app to get home.

Trade views

An all-driver survey undertaken for the first time for this area received just 35 responses, about 2% of the total. 71% of respondents were private hire and just 14% hackney carriage. 69% said the licensed vehicle trade was their only or main source of income. 19% principally got their work from ranks.

85% owned their own vehicle. 77% said they accepted pre-bookings. 20% said they got work from ranks but 10% said from hailing.

36% felt rank work was reduced now. 70% felt there were more than enough hackney carriages in Nottingham. 64% felt the limit on hackney carriage vehicle numbers should be retained. Reasons the limit benefitted the public included minimising congestion and pollution.

In other comments the most dominant point made was the high level of out-of-town vehicles drivers were aware of.

Disability review

A disability user survey was issued on our behalf by the council but received just a single response. They felt the overall service provided was satisfactory but also had major concerns on the way drivers treated them.

Formal evaluation of significance of unmet demand

The overall level of average passenger delay remains very low, at just 0.07 minutes. Latent demand levels are low, just 2.6%, and overall ISUD factor is low at just 0.75 (where 80 is the level where this would be said to be significant). The biggest element of the index is off peak passenger queues.

Synthesis

Using the latest (to end of March 2022) rail statistics, there are in the order of 52,000 passengers leaving Nottingham station in a typical week. the 3,856 hackney carriage passengers observed at the rank near the station implies 7.4% of all arriving station passengers leave using a hackney carriage from the rank – not a small proportion and relatively typical around the country.

Although the number of active ranks has declined and it is clear many markets have been eroded by the use of apps and private hire vehicles, the current fleet of hackney carriages still covers eight ranks across the city centre very well and effectively. Despite the fleet being around half of its maximum size it provides a level of service to the public with hardly any unmet demand existing at all. Although overall demand for rank-based vehicles is clearly reduced the service covers a wide range of central areas and needs.

Main opportunities to develop the service are focussed around public information – particularly informing people where ranks are, which are active when – but also ensuring people are aware of the difference between hackney carriage and private hire, and the pitfalls of using any vehicle that is not clearly from Nottingham City. The hackney carriage trade may need to consider use of the hackney carriage based apps to recover some of its lost ground.

Conclusion

Drawing on all the evidence within this report, there is **no evidence of any unmet demand which could be counted significant in terms of Section 16 of the 1985 Transport Act.**

The fleet is providing a good level of service to the public and covers the city centre well both spatially and temporally.

Key actions require public information about ranks and how they can access the licensed vehicle service safely and effectively.

Unless legislation changes, there would be strong merit in undertaking a further demand survey three years hence, meaning rank work would be during October 2025 once University students had returned.

10 Recommendations

The conclusion that there is no evidence of any unmet demand being significant provides the Council the option of retaining its current limit policy and keeping the level of vehicles at the present level.

There is merit in improving signing and marketing of rank locations across the area, although this is not directly in the gift of the licensing section.

Clear consideration of rank locations, particularly in terms of how they might service those in wheelchairs would also be a benefit.

The debate about what a 'fully accessible' hackney carriage might be needs to be held with trade and public alike. Despite significant national debate there is no clear definition of what this could be, and a growing understanding in the mind of professionals that such a vehicle cannot exist. What can exist, however, is documentation of what both trade and public consider they need, and comment following explaining what and why various standards might be achieved.

The potential for training and other adaptations to the range of fleet needs detailed discussion and liaison between trade, licensing and the public users of the service. This may need a living and developing user/provider/regulator action group. However, we strongly recommend that all scenarios considered must include fully wheel chair accessible hackney carriages.

The issue of the negative impact of the Interchange supplementary permit has now gone away, with the focus now being need to ensure that the proposed development of the area around the interchange focusses on ensuring hackney carriage service to this location is also developed further and improved.