Community Protection Committee

DATE	01/09/2020
REPORT OF	Clive Tritton - Interim Director for Economy and Growth
SUBJECT	North East Lincolnshire Council Hackney Carriage Unmet Demand Survey - Final Report
STATUS	Open

CONTRIBUTION TO OUR AIM

Stronger Community:

- Ensuring adequate Hackney Carriage Provision within North East Lincolnshire.

Stronger Economy:

- Ensuring support for the Hackney Carriage trade with reference to quantitative control measures.

EXECUTIVE SUMMARY

- This report outlines the findings of a survey carried out to ascertain whether there is any unmet demand for hackney carriages in North East Lincolnshire. The survey was undertaken at the request of the Licensing & Community Protection Committee to provide a legal basis on which to base future decision on licensing policy. The survey concluded there is currently no significant unmet demand.

- The reports also provides some additional information about the operation of the Hackney Carriage fleet which we intend to factor into future plans relation to potential policies.

RECOMMENDATIONS

- That Committee considers the findings of the survey and determines which of the options set out in section 8.1 to adopt.

- That this decision be reviewed after a maximum of 3 years – as recommended by the Department for Transport.

REASONS FOR DECISION

To ensure adequate Hackney Carriage Provision within North East Lincolnshire and to support the Hackney Carriage trade through with appropriate use of available quantitative control measures and additional associated initiatives.

1. BACKGROUND AND ISSUES

1.1. Under the Town Police Clauses Act 1847, a licensing authority could previously limit the number of hackney carriage licences as it thought fit. Under the Transport Act 1985, the position in law changed and the 1847 Act, as now amended by Section 16, provides as follows: *"That the grant of a licence may be refused for purposes of limiting the number of hackney carriages…, if but only if, the person authorised to grant a licence is satisfied that there is no significant demand for the services of hackney carriages… which is unmet".*

1.2. The Act also provides for an appeals procedure whereby unsuccessful applicants for hackney carriage licences may call upon an authority to demonstrate that it is satisfied that there exists no significant unmet demand. If, in the eyes of the Court, an authority fails to meet this requirement, the appeal against the refusal to issue a licence will be successful

1.3. The Local Government (Miscellaneous Provisions) Act 1976 allows for the Licensing Authority to charge fees to cover the reasonable cost of the service provided. This includes any reasonable administrative costs and costs relating to the control and supervision of hackney carriages.

Following the last survey in 2017 The Community Protection Committee resolved:

RESOLVED – That the Status Quo option to retain the limit at the current level be adopted.

1.4. On the 11th September 2019, The Community Protection Committee resolved that a further unmet demand survey be carried out in order to provide a basis for future policy decisions. This decision was supported by North East Lincolnshire Hackney Carriage Association.

1.5. The survey has now been completed by CTS Traffic and Transportation. A copy of the report is attached as Appendix 1.

2. TIMELINES

Some key points from the report are set out below:

- This survey was carried out between November 2019 and mid-March 2020
- On street pedestrian survey work occurred in February 2020 (on a Tuesday and a Wednesday)
- The video rank observations occurred in mid-February 2020
- Licensed vehicle, driver and operator opinions were canvassed electronically and surveys were posted out from mid-February to mid-March 2020
- Key stakeholders were consulted throughout the period of the survey (but not all responses were received)

3. LOCAL BACKGROUND AND CONTEXT

3.1 After the 2012 survey the Council reduced its limit from 235 to 220 and made arrangements that the spare 10 licences be issued as wheelchair accessible style.

The authority has a current population of 159,507 using the 2020 estimates currently available from the 2011 census, 2016 revision. For those aged 15 or more (those available for on-street interviews), the census suggested there were 49% males, 20% under 30, 38% 31-55 and 42% over 55 in the local population of the district.

3.2 North East Lincolnshire Council has chosen to utilize its power to limit hackney carriage vehicle numbers. The limit was removed in 2005 but restored at the level of 235 in 2009, then reset again to 220 in 2012. Surveys were undertaken last in 2016, 2012 and 2009.

4. RANK SURVEYS

4.1 The observations of activity at and around the ranks provided some 211 hours of observation over the period covering Thursday 13th to the early hours of Sunday 16th February 2020.

4.2 The main location with cars using the rank, or nearby, in a way that might affect rank operation, was St Peter's Avenue in Cleethorpes (80% of all activity), followed by Freeman Street Market in Grimsby (56% of all observations). The rank near Cleethorpes Station saw 43% private cars, Victoria Street Grimsby 36%, Sea Road Cleethorpes 21%, and High Street Cleethorpes 18%. Some of these see very little if any hackney carriage activity. The low level of abuse at High Street may be related to the more recent increased usage of those ranks as well as more modern marking, whilst markings in St Peter's Avenue are present but very worn, with even the sign having been vandalised with a sticker obscuring it, although this location also rarely sees hackney carriage vehicles.

4.3 In terms of hackney carriage usage, the overall records suggest 55% of all observations were at the Station at Grimsby, 29% at High Street, Cleethorpes, 7% at Victoria Street Grimsby, 5% at Market Street Cleethorpes, 3% at Freeman Street Market and 1% at Cleethorpes Station. Both St Peters Avenue and Sea Road did see hackney carriage movements, but only at a very minimal level.

4.4 From the current observations, there are 8,430 passenger departures in a typical week from all ranks in the NEL licensing area. The bulk of these, some 58% are from the station rank at Grimsby. 21% are from High Street Cleethorpes, 10% from Market Street Cleethorpes, 7% from Victoria St Grimsby, 4% from Freeman Street Market and 1% from the Cleethorpes Station rank. A very small number of passengers were seen at the St Peter's Avenue rank in Cleethorpes. Sea Road saw no passengers.

4.5 The main change since 2016 appears to be significantly more usage of the ranks in Cleethorpes at night. Both Market Street, and more so High Street, have both increased their numbers of passengers. Victoria Street Grimsby saw reduced passenger levels, meaning High Street Cleethorpes was now the second busiest rank, with 21% of total estimated flows.

4.6 Freeman Street Market saw reduced flows, as did the ranks near the Station in Cleethorpes, whilst no passenger demand was observed at Sea Road this time although some small usage was observed at St Peter's Avenue during this survey.

5. GENERAL PUBLIC VIEWS

5.1 For this survey, a robust total of 200 interviews were obtained. The resulting sample in 2020 was checked against the current 2020 estimates from the 2011 census, 2016 revision.

5.2 In terms of overall use of licensed vehicles, the largest proportion, 37% said they never used them. 22% said once or twice yearly with just 4% saying three or more times weekly. This resulted in an estimated usage level of 1.4 licensed vehicle trips per person per month – not high. In 2016 41% had said 'less than once a month', suggesting perhaps a reduction in usage since that time.

5.3 In terms of local differences, 42% never used licensed vehicles in Cleethorpes with 35% in Grimsby. Trip estimates ranged from 0.5 for Cleethorpes to 1.7 for Grimsby. Once or twice-yearly values were consistent with this pattern – 28% in Cleethorpes and 19% in Grimsby.

For hackney carriages, the top value was that 40% could not remember when they had last used a hackney carriage (marginally reduced from the 44% of 2016), with the highest actual percentage usage being 14% for once or twice yearly, and just 3% saying three or more times weekly. The resulting estimate of usage is again low at 1.0, but this value does suggest high relative usage of hackney carriages, being 68% of the total usage of licensed vehicles.

Again, the local pattern of higher usage in Grimsby is supported – Cleethorpes respondents said 63% could not remember when they last used a hackney carriage but this in Grimsby was 32%. This was also reflected in the 0.1 usage estimate for Cleethorpes for hackney carriages with a much stronger value of 1.3 for Grimsby.

5.4 Eight people said why they would not use ranks. 75% said they used the bus instead, whilst the remaining 25% said using ranks was too expensive.

People were asked to rate various aspects of their recent trip 'in a taxi' (having been asked to focus on hackney carriages). Half those interviewed provided a response. All responses apart from one (with respect to price), saw the highest score being for 'very good'. There were no elements that scored 'very poor' at all. Vehicle aspects scored best, with vehicle repair scoring marginally higher than cleanliness. Neither of these aspects scored any poor or very poor scores at all.

5.5 The driver elements also scored highly, although each had a very small element of ‘poor’ score, but never higher than 3% (for driver appearance). Driver behaviour had the highest positive score, with knowledge of the area the lowest (but still 50% said ‘very good’).

5.6 Comparing areas, Grimsby respondents generally had a wider range of appreciation, with most Cleethorpes responses being either good or very good, apart from driver knowledge of area which saw 29% in Cleethorpes say was average.

5.7 As is often the case, price was the key item people were less appreciative of. Just 20% felt price was ‘very good’. 38% said ‘good’, 36% average and 6% said poor. However, even this aspect though clearly not scoring as highly, had no ‘very poor’ scores. Grimsby respondents were generally less concerned with price than those in Cleethorpes.

5.8 Overall, this suggests a very well appreciated licensed vehicle service in the North East Lincolnshire licensing area but again with differences between the service provided in the two main areas.

5.9 The issue of latent demand was considered. Six said they had given up waiting at a rank, but one of these was not a rank location. This implies the rank-based latent demand value is 1.025. Five had given up hailing, both in legitimate places giving a hailing-based latent demand value of 1.025, and a combined value of 1.05. This was supported by 87% saying they felt there were sufficient hackney carriages in the area overnight. This value was similar for both locations.

5.10 All those responding felt safe using daytime licensed vehicles, with a slight reduction to 96% feeling safe at night. Only two responses were made to what might make people feel safer. One said ‘nothing’ and the other said they would simply avoid travelling if they did not have confidence, they would feel safe. 84% of those responding said they did not themselves need, nor did they know anyone who needed an adapted licensed vehicle. This is a relatively low value compared to many other responses, suggesting relatively high need of such vehicles. It is also lower than the 89% quoted in 2016 suggesting increased need. Most of those that said there was need had requirements for a WAV style (2%), with the bulk saying they knew someone who needed a WAV (12%). A small number (2%) said they needed some other adapted vehicle, not a WAV. These values were again similar in both locations.

5.11 In 2016, the needs for different vehicles either WAV or other was a lot more equal, suggesting not only an increased need, but also a focus on the more WAV style of vehicle.

5.12 61% answered a question if they felt people in North East Lincolnshire that had disabilities got a good service from hackney carriage vehicles and drivers. 58% felt they did, 40% did not know and 2% said they thought people did not. One said they were aware of someone that had waited a long time for a WAV style vehicle whilst the other person said they felt drivers appeared sometimes reluctant to help with the wheelchair. There was a difference in the two locations, with the Cleethorpes saying 41% felt they did whilst Grimsby respondents said 62%. This might relate to the higher level of hackney carriage usage and availability in Grimsby, with a much higher WAV fleet percentage.

6. TRADE FEEDBACK

- For the study, 545 letters were issued. This covered all drivers, both hackney carriage and private hire. The response was 6%, which is good and reasonable, albeit less than the 12% from the 2016 survey.
- All responses were received by Monday 16th March before any impacts were felt of the Coronavirus and therefore all results are fully valid in the context of the overall survey.
- The level of responses from both parts of the trade means that relatively realistic comparisons can be made between the general statistics obtained from each part of the trade. Hackney carriage drivers had much longer lengths of service – nearly 14 years compared to just under 10 for the private hire respondents. Longest service was 28 years for hackney carriage and 18 years for private hire – both good levels of experience but again suggesting more for the hackney carriage element. Compared to 2016 there may have been some retirements leading to a slightly reduced level of experience now.
- However, when comparing working weeks, the average days and overall spread of days' work for both parts of the trade was effectively the same for both parts of the trade at around 4.7 days each. A third of hackney carriage drivers said they worked five days whilst this proportion of private hire said they had worked six days, with a further 28% saying five days. However, 13% of hackney carriage drivers said they worked seven days compared to just 6% for private hire.
- The quoted hours worked suggested overall longer hours for private hire in terms of the maximum worked (67 hours compared to 60), and also on average private hire worked more hours (42 compared to 35 hours). Both the maximum hours and average hours have reduced compared to 2016 (80 maximum and 46 average in 2016).
- The main issue affecting when people worked was family commitments (29%) followed by equal shares (18% each) for working busy times, avoiding disruptive passengers, and simply 'preference'. 9% said their working hours were affected by them sharing a vehicle with just 2% avoiding heavy traffic.
- There were no clear 'other' responses that dominated this final 5% of those responding. The responses were very similar to 2016.
- 88% owned their own vehicle. Just 3% said someone else also drove their vehicle. This response was equally split between the other person using the vehicle for days and weekends. Again, the response was remarkably similar to that for 2016. 64% accepted pre-bookings – reduced from the 74% of 2016. A small number of these were independent hackney carriages accepting their own pre-bookings.
- Two companies were named that gave work to both hackney carriage and private hire vehicles (same as in 2016). One of these obtained 38% of the mentions (exactly the same as in 2016) whilst the other gained 14%. A third,

private hire only operation saw 14%. All other quoted links only obtained one quote each (5% of the total).

- The hackney carriage respondents were almost evenly split between those that took pre-bookings and those that did not. This suggests a relatively high proportion of hackney carriages remain independent and effectively principally rank-based for their hires. On the private hire side, 78% accepted pre-bookings suggesting the remainder must be niche operations focussing on guaranteed work for specific clients.
- Although 14 different names were given for rank locations serviced, in reality these were just eight rank locations. There were effectively five different names given to the Station rank in Grimsby. In total these added up to 35% of all rank mentions. The next largest site quoted, with 19%, was Cleethorpes High Street. Victoria Street was quoted by 15% albeit in different guises. The two ranks that make up the Cleethorpes Station location gained 6% of votes. Market St Cleethorpes gained a similar level, as did Bethlehem Street. Garibaldi Street gained one vote, 3% of the total.
- This suggests drivers do use the bulk of ranks available to them, although overall total knowledge is pragmatic rather than specific in name terms. About a third of mentions were for Cleethorpes ranks, with the High Street the dominant one used. There were no mentions of Sea Road nor the other two ranks at the southern end of the town. The lesser used locations along the main Grimsby axis from the station were also mentioned albeit only by a few.
- There was an almost even split between those saying there were issues with rank operation and those not, with a slight bias towards there being no issue. Key issues related to the shortage of space for the popularity of the Station rank in Grimsby, but other issues were also raised. One said the Sea Road ranks in Cleethorpes had not been remarked. Another said there were not enough spaces when ranks were operating in High Street and Market Street Cleethorpes.
- Many multiple responses were given in regard to how people obtained fares. For the full sample and all responses, telephone gained 25%, ranks and phone apps 22% each, hailing 16% (very high) with school contracts 9% and other (half of which were direct office bookings), 5%. The only option that anyone said they got all their bookings from was the five who said they depended totally on an app. None of the other options, including rank and phone, gained such total dependence.
- 71% of respondents felt fares were about right. 23% felt they should be increased and 3% said reduced.
- 94% of those responding felt the number of hackney carriages should continue to be limited. This included all but one private hire who did not respond, and one private hire that felt the limit should not be retained. This is a very high support for the limit albeit less than the 97% in 2016. 97% felt there were enough hackney carriages licensed.

- Many suggested how this benefitted the public. Two suggested it enabled people to get to know the current trade by keeping the trade stable and giving long term experience in the driving fleet. Many said it kept congestion from getting worse but suggested there were already too many vehicles and that congestion issues were already severe. Many confirmed there was no need for more vehicles.
- Various other comments were provided. Many said there were too many vehicles and one suggested private hire vehicle numbers should also be limited. One raised issues that they thought others overcharged and that customers told them that regularly. Another wanted action about too many customers leaving without paying their fare. One asked for more help with moving to electric vehicles.
- In summary, a good level of response was obtained which was typical for a driver survey and definitely had no impacts from the impending coronavirus issue. There was very strong support for the limit and nearly everyone agreed there were sufficient vehicles, if not too many.
- The following question was posed to respondents:
  "NEL is reviewing the current licence plate position condition and considering having the Council licence plate set alongside the vehicle registration plate. This is due to increasing issues with the ability of licence holders to comply with the current condition as a result of modern vehicle design." Just over half responded. 29% were opposed. Some suggested the suggestion would be more damaging or difficult to achieve. 12% had no preference. 24% said the current system was acceptable and no change was needed, with one suggesting you could easily adapt to work with current options for most vehicles. 6% suggested a smaller plate. 29% were in favour. One of these respondents said the current system damaged their vehicle to achieve whilst another agreed but asked if waste could be reduced by not completely replacing the plate on every anniversary.

7. DISABILITY ISSUES

7.1 Of all the hackney carriage vehicles observed, 29% were noted as appearing to be wheelchair accessible vehicle styles (WAV). This is marginally less than the 33% proportion of the fleet that are actually WAV style. This suggests little difference in preference for service at the station for the different styles of vehicle. During the period of the survey, 12 people at the Grimsby Station rank and two at the Market rank were observed leaving in wheelchairs. This is an increase from the total of 10 in 2016. Interestingly, the level of usage at the Market rank was the same, possibly suggesting established users. A further 64 people, 52 at the station, 9 at the Market, two at Victoria Street and one at High Street, Cleethorpes were observed with disabilities that required assistance into vehicles. This was a much higher level than the two observed in 2016.

7.2 A local health service contact was spoken to. They told us that their major issue in the past had been obtaining up to date information for those needing to obtain services from hackney carriages for their disabled clients. They felt the recent list provided had helped enormously in ensuring those needing disabled accessible vehicles could get them when they needed them. They told us their main service was giving advice to the public who called their Single Point of Access service for advice. They also used contacts to find transport for their own clients when necessary. They confirmed they did not have any specific contacts they could provide us to give their experience or views. They did not think that any offer of any meeting with people would be taken up, even if they were able to suggest any potential candidates. However, they provided us details for Carers Support Service and another group that might be able to provide specific contacts. The lockdown prevented further contact.

8. CONCLUSIONS

On the basis of the evidence gathered in this unmet demand survey for North East Lincolnshire, our key conclusion is that there is no evidence of any unmet demand for the services of hackney carriages either patent or latent which is significant at this point in time in the NEL licensing area. Maintenance of the WAV vehicle list is providing significant accessibility benefits and must remain a priority. The need for refreshing markings at all ranks that see any level of usage must be taken forward. Ranks not needed by trade nor frequented by passengers should at the same time be removed, possibly shifting some spaces to other smaller sites alongside their remarking.

8.1 The following options are therefore open to the committee:

<u>Status quo</u>: retain limit and at current level
<u>Removal of limit</u>: this option is possible at any time

- The **<u>status quo</u>** option will maintain the current situation as it stands. It will give benefit to the trade as any increased demand would be shared with the current vehicles only. Further decreases would only be affecting the current vehicle numbers. Issues of over-ranking may not get worse.

- **<u>Removal of the limit</u>** - The committee is always at liberty to follow stated Government-encouraged deregulatory trends. There is no need for surveys to allow a decision for the limit on vehicle numbers to be removed. This could be used to see a further increase in WAV percentages. It may allow new blood into service ranks that are presently little used. However, it risks severe pressure on the situation at the Grimsby station rank as it is not possible to restrain where new plates choose to serve. It risks introducing uncertainty to the present trade and possible loss of those with significant experience serving the public from the trade. With reducing demand, it increases pressures on driver livelihoods which in many areas have been proven to lead to worsening of service to passengers.

Taking all the evidence into account, we would recommend that the status quo option be considered. This option provides benefit to both trade and public.

9. RISKS AND OPPORTUNITIES

Human Rights / Equality and Diversity – It is important that policy reviews can be justified in the event of litigation by affected parties.

Value for Money – The survey services being provided must be value for money in terms of their benefit and the method of re-charging the trade. Failure to ensure this would be a financial cost to the Council.

The Impact on the Social, Economic and Environmental well-being of the Borough – The transport service provided by hackney carriages is an important factor in the social wellbeing and safety of the borough. The availability of a suitable number of appropriate vehicles is therefore important and there is a risk if this is not properly addressed.

Economic Risk - There is a risk that if there are too many Hackney Carriage vehicles operating there will be adverse effect on the trade and pressure on some ranks.

Economic Opportunity - By limiting the numbers of Hackney Carriage vehicles to an appropriate level, the trade has the best opportunity to provide an effective service whilst optimising income.

10. OTHER OPTIONS CONSIDERED

10.1 The options and associated comments and advice are set in section 8.1 of this report

11. REPUTATION AND COMMUNICATIONS CONSIDERATIONS

11.1 There are potential positive reputational implications in relation to effective implementation of this legislation as outlined in the report. An action plan has been agreed with the Council's communications service covering information requirements and communication channels to be utilised.

12. FINANCIAL CONSIDERATIONS

12.1 The proposal outlined within the report supported the Council's key financial objectives to shift our financial resource to support delivery of the Council's vision and reduce reliance on central government funding. The survey was financed through licence fees. The survey has been consistent with the Council's charging and income generation policy and will help to contribute to improved value for money within the service.

13. CLIMATE CHANGE AND ENVIRONMENTAL IMPLICATIONS

13.1 No direct implications

14. FINANCIAL IMPLICATIONS

14.1 There are no direct financial implications as a result of this report

15. LEGAL IMPLICATIONS

15.1 Section 37 of the Town Police Clauses Act 1847, as amended by section 16 of the Transport Act 1985, enables Councils to licence Hackney Carriage vehicles and to restrict the number of Hackney Carriage vehicle licences only if they are satisfied that there is no significant unmet demand for taxi services in their area.

15.2 Any decision must be evidence based and for good reason or is otherwise capable of being legally challenged.

15.3 It is recommended the decision should be reviewed within a 3year period.

16. HUMAN RESOURCES IMPLICATIONS

16.1 There are no HR implications arising from the contents of this report.

17. WARD IMPLICATIONS

17.1 All Wards

18. BACKGROUND PAPERS

18.1 Appendix 1: CTS Unmet Demand Survey

19. CONTACT OFFICER(S)

19.1 *Adrian Moody &* Tracey Cook 324035

CLIVE TRITTON
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North East Lincolnshire Council
Unmet Demand Survey

June 2020

Executive Summary

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

The evidence gathered in this unmet demand survey concludes there is no evidence of any unmet demand for the services of hackney carriages in the NEL licensing area which is significant. This result covers both patent and latent demand. In fact, there is strong counter evidence that the current limit policy provides public benefit and stability to the trade and on that basis should be retained.

During the course of the survey, it was identified that the current maintenance of the WAV vehicle list was providing significant accessibility benefits to those needing such vehicles, and keeping this list current must remain a priority.

The study demonstrates the strong positive benefit of keeping rank markings current and clear. Any currently used ranks that need markings refreshed need to be actioned as soon as possible, and high importance given to ensuring present markings are kept up to date and clear. Any ranks no longer needed by trade nor frequented by passengers should be removed to avoid confusion and to allow focus on those ranks that need continual maintenance.

This survey database should be refreshed with fresh rank observations undertaken preferably no later than November 2022, or at the very latest by March 2023.

Details from this Report should be shared with those in the transport policy section of the Council and more detailed involvement by the licensing section with the next LTP revision would be of strong benefit.

Options to consider how supply and demand are changing based on the current situation before the pandemic lockdown and knowledge of how the situation is developing toward the new normal are worthy of consideration.

Contents

1 General introduction and background

North East Lincolnshire 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".

Background

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

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

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

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

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

Current Government Policy review status

It is also understood that the revisions resulting from the recently closed Government Consultation will eventually lead to a more comprehensive review of the sections of the BPG not affected by the February 2019 Statutory Guide, as stated in para 1.8 of that document – "A consultation on revised BPG, which focusses on recommendations to licensing authorities to assist them in setting appropriate standards (other than those relating to passenger safety) to enable the provision of services the public demand, will be taken forward once the final Statutory Guidance has been issued." There is currently no quoted date either for final agreement on the "Protecting Users Statutory Guidance" nor for the taking forward of the wider BPG review. The April 2010 BPG therefore remains valid for our review.

The present background to policy

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

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

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

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

Unmet demand and its significance

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

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

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

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

Case law and unmet demand

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

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

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

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

Most recent changes relating to demand

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

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

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

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

The current status regarding unmet demand studies

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

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

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

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

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

Conclusions

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

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

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

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

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

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

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

Coronavirus

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

For this study all but the key stakeholder reviews had been completed. All the evidence gathered above will remain valid as a snapshot of the operation of the industry immediately before the lock down and these reports have been produced on that basis, keeping in mind the developing situation as part of our considerations within analysis. All evidence for this survey was gathered before the lockdown, apart from the key stakeholder review.

2 Local background and context

Key dates for this report title for North East Lincolnshire Council are:

- appointed Licensed Vehicle Surveys and Assessment (LVSA) on 13 November 2019
- in accordance with our proposal of October 2019
- as confirmed during the inception meeting for the survey held on 19 November 2019
- this survey was carried out between November 2019 and mid-March 2020
- On street pedestrian survey work occurred in February 2020 (on a Tuesday and a Wednesday)
- the video rank observations occurred in mid-February 2020
- Licensed vehicle driver opinions and operating practices were canvassed using an electronically available and posted out survey from mid-February to mid-March 2020
- Key stakeholders were consulted throughout the period of the survey (but seen note later)
- A draft of this Final Report was reviewed by the client during early June 2020
- and reported to the appropriate Council committee following acceptance by the client.

North East Lincolnshire Council is a unitary authority in the Yorkshire and Humber region of England, and in terms of background council policy able to determine its own planning, transport policy and highways. The current Local Transport Plan remains that which was in place at the time of the last survey, running from April 2011 and continually refreshed. At the time of this survey, the LTP Delivery Plan for 2019/20 to 2021/2 had most recently been agreed. The principal reference to taxi and private hire remains Section 3.6:

"Taxis and private hire vehicles are an important complement to both public and private transport. The role of both, and their integration with other modes of transport, will continue to be reviewed as part of the overall strategic development of transport in the Borough. We will work closely with taxi and private hire providers to ensure that policies currently adopted by the Council are fit for purpose and continue to meet the needs of the public. In particular we will look specifically at the needs of people with mobility impairments or other disabilities and those people who cannot access other public transport modes easily.

Key issues identified formally are to:

- ensure integration of taxi policy with wider transport policy
- ensure an appropriate supply of taxis and private hire vehicles
- ensure that the needs of people with mobility impairments and those with other disabilities are catered for

Two key performance indicators regarding taxis are the total number of taxis (SD13) and the number that are wheel chair accessible (SD14)."

The document suggests the above numbers are obtained from operators annually when they could be directly obtained from the licensing section, and they also omit private hire provisions.

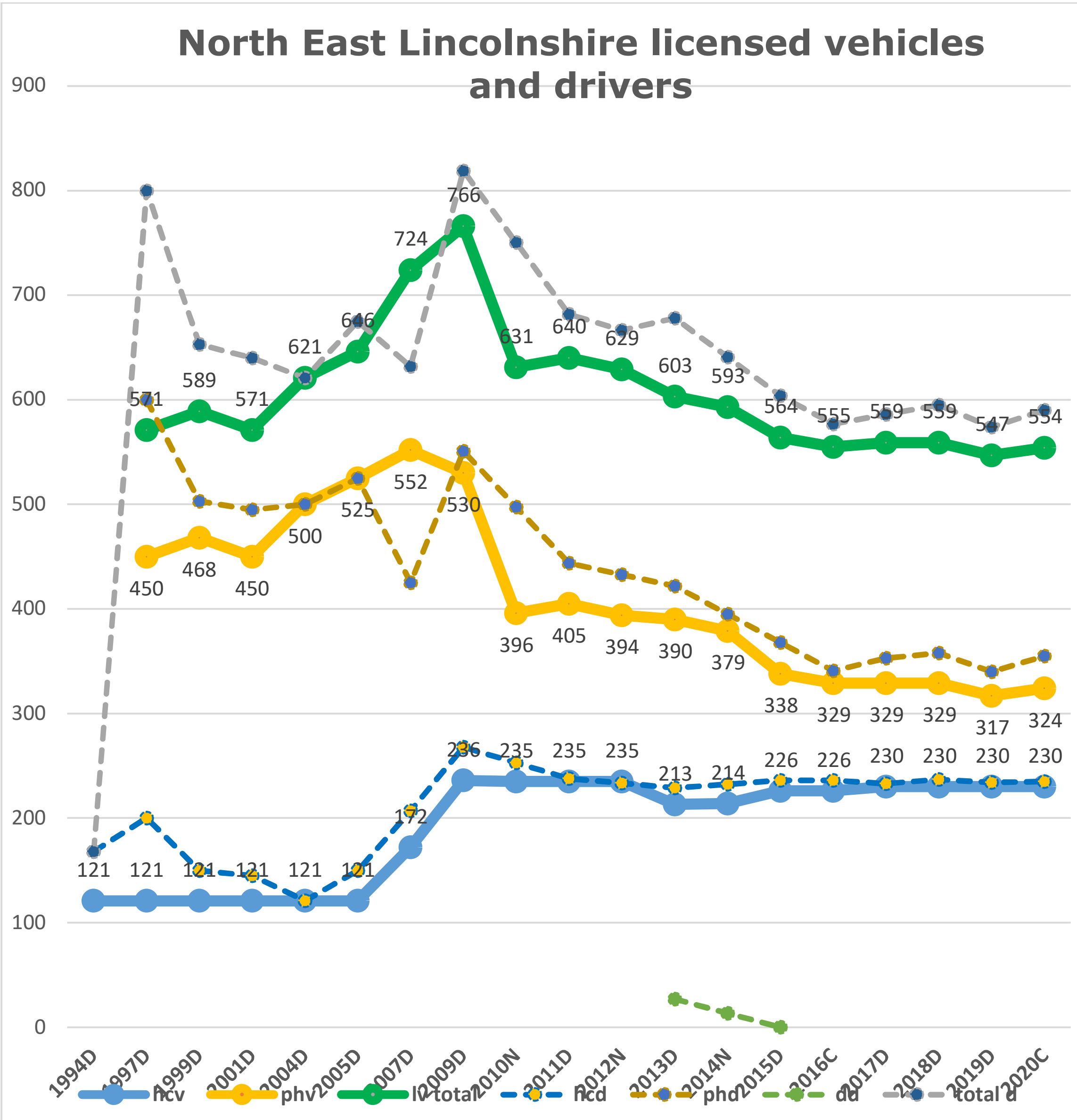
Just before the previous survey, central Grimsby public realm improvements had recently been completed. Plans for revisions around Freeman Street market were expected to increase the level of demand for both hackney carriage and private hire in that location. Most recently, public realm works had been completed around the ranks in Cleethorpes (with some ongoing work not directly affecting active ranks).

After the 2012 survey the Council reduced its limit from 235 to 220 and made arrangements that the spare 10 licences be issued as wheel chair accessible style. At the same time it was agreed all drivers with medical exemption certificates must maintain their vehicles as WAV style. These two decisions sought to encourage increased levels of WAV in the hackney carriage fleet.

The authority has a current population of 159,507 using the 2020 estimates currently available from the 2011 census, 2016 revision. For those aged 15 or more (those available for on-street interviews), the census suggested there were 49% males, 20% under 30, 38% 31-55 and 42% over 55 in the local population of the district.

North East Lincolnshire Council has chosen to utilize its power to limit hackney carriage vehicle numbers. The limit was removed in 2005 but restored at the level of 235 in 2009, then reset again to 220 in 2012. Surveys were undertaken last in 2016, then in 2012 and 2009. This present survey was slightly delayed from the BPG guidance of three years interval due to need to wait for completion of the revised ranks in Cleethorpes before rank survey work was undertaken.

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

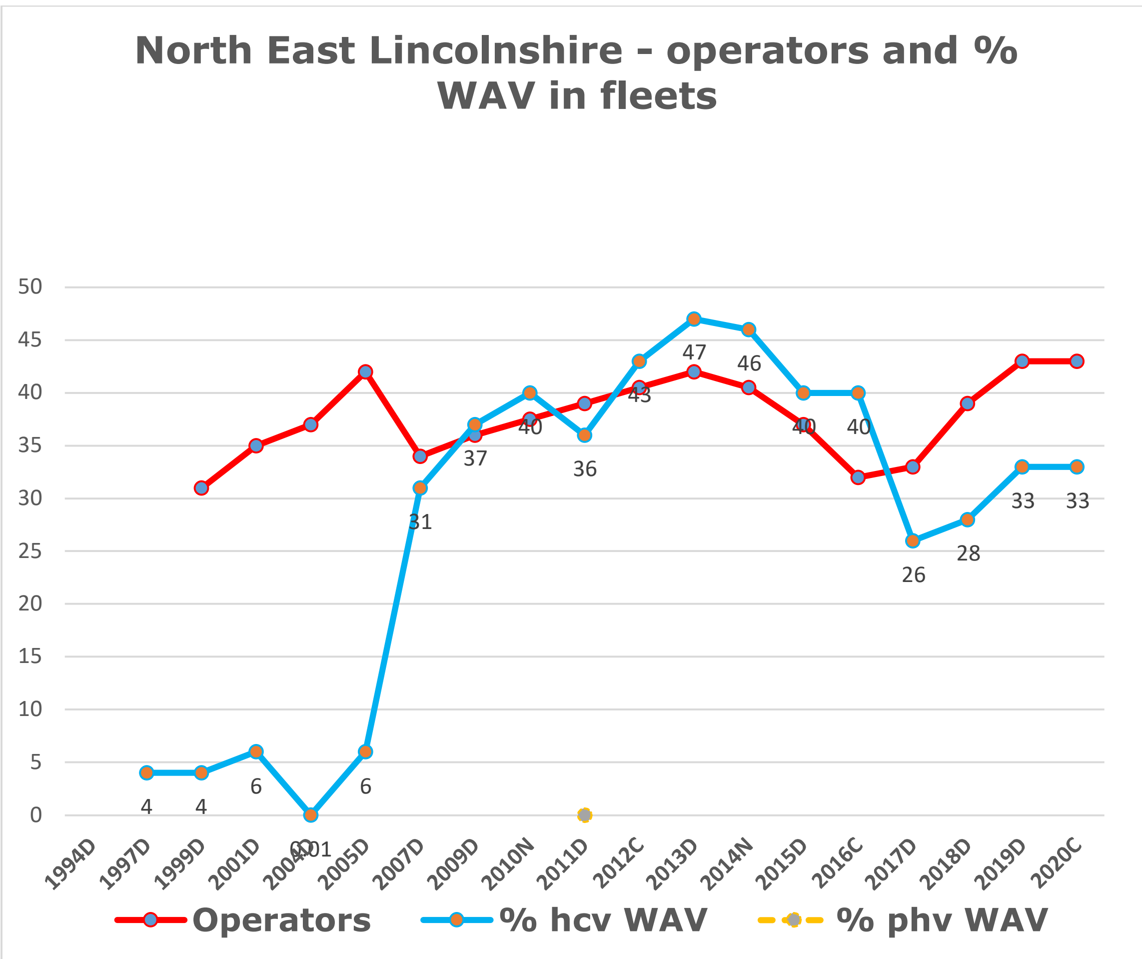


Licensing Statistics from 1994 to date

The graph above shows the 97% increase in hackney carriage vehicle numbers that occurred after the removal of the limit in 2005. However, the impact of this on private hire vehicle numbers lagged with these dropping from 2007 onwards, with that reduction continuing until the latest information provided for this study. Further, the level of hackney carriages dropped in 2013 but has since risen steadily to the current level of 230. The hackney carriage vehicle numbers, however, seem to be more stable than those in the private hire fleet.

The same picture is true for the driver numbers although these are a little more fluctuating than the vehicle numbers, with two marginal increases since the last survey. Again, the hackney carriage driver numbers are much more stable than the private hire.

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



Operator numbers and levels of WAV provision in the fleet

This graph shows the impact of the limit removal on WAV style vehicles being very positive, given that new vehicles had to be that style. However, the peak of 47% of the hackney carriage fleet being WAV did not last, with the level reduced to 26% by the time of the last survey. However, since then, the proportion has again increased and now stands at a third of the hackney carriage fleet.

Setting this proportion in context within the 2019 DfT national set of taxi statistics, given the authority has no WAV style phv, the fleet WAV proportion is 14%. This places North East Lincolnshire 100th equal out of the 292 English licensing authorities at that time in terms of WAV provision in the total fleet. For all 292 English licensing authorities, the average hcv WAV proportion is 42%, although this reduces to 23% when the fully WAV fleets are removed. This suggests the level of 33% of the hackney carriage fleet being WAV is ahead of the typical average by some way. There remain two English licensing authorities without any hackney carriages, a further four with no WAV in the fleet at all and a further 12 where the only WAV are in the private hire fleet. This further puts the level of WAV in North East Lincolnshire in a positive light.

3 Patent demand measurement (rank surveys)

As already recorded in Chapter 2, control of provision of on-street ranks in North East Lincolnshire is fully under the control of the highways section of the Council. Recent activity has seen significant development of the town centres across the authority with respect to public realm, which has impacted on rank provision.

Appendix 2 provides a list of ranks in North East Lincolnshire at the time of this current survey. Our methodology involves a current review both in advance of submitting our proposal to undertake this Unmet Demand survey and at the study inception meeting, together with site visits where considered necessary. The hours observed were agreed with the client, with the aim of covering every rank when it was believed to be used, whilst omitting operable hours not understood to see any usage.

This provides a valid and appropriate sample of rank coverage which is important to feed the numeric evaluation of the level of unmet demand, and its significance (see discussion in Chapter 7). The detailed specification of the hours included in the sample is provided in Appendix 3. Detailed results by rank, day and hour are in Appendix 4.

Significant changes to ranks in Grimsby had occurred just before the last survey. This time, the significant changes have been in Cleethorpes where a major refresh has occurred along the two main routes through the central area. This has included provision of a new rank on the opposite side of High Street, directly outside a major venue. The rank work was delayed until the sections of work that affected licensed vehicle operation were completed and allowing for some time for the new rank to settle in.

Overview of rank observations

The observations of activity at and around the ranks provided some 211 hours of observation over the period covering Thursday 13th to the early hours of Sunday 16th February 2020. During this period, some 13,305 different activities were noted including pedestrian and vehicle arrivals and departures and some general notes of relevant activities. Of these records, 73% were vehicle arrivals or departures of all kinds of vehicles.

Of the vehicle arrivals and departures, 77% of these were of local licensed hackney carriage vehicles. A further 3% of observations were local private hire vehicles with 0.2% of all observations being licensed vehicles that did not appear to be local; all these were at the Station rank in Grimsby.

17% of all observations were private car arrivals or departures, with 1% emergency vehicles and 1.8% goods vehicles. The main location with cars using the rank, or nearby, in a way that might affect rank operation, was St Peter's Avenue in Cleethorpes (80% of all activity), followed by Freeman Street Market in Grimsby (56% of all observations). The rank near Cleethorpes Station saw 43% private cars, Victoria Street Grimsby 36%, Sea Road Cleethorpes 21% and High Street Cleethorpes 18%. Some of these see very little if any hackney carriage activity. The low level of abuse at High Street may be related to the more recent increased usage of those ranks as well as more modern marking, whilst markings in St Peter's Avenue (as shown on Streetview, August 2018) are present but very worn, with even the sign having been vandalised with a sticker obscuring it, although this location also rarely sees hackney carriage vehicles.

In terms of hackney carriage usage, the overall records suggest 55% of all observations were at the Station at Grimsby, 29% at High Street, Cleethorpes, 7% at Victoria Street Grimbsy, 5% at Market Street Cleethorpes, 3% at Freeman Street Market and 1% at Cleethorpes Station. Both St Peters Avenue and Sea Road did see hackney carriage movements, but only at a very minimal level.

Overall rank usage estimates

The information from the rank observations was used to estimate typical weekly passenger usage by rank. The table below shows the result of these estimates:

Comparison of rank average weekly flow estimates								
Rank	**2020**		**2016**		**2013**		**2009**	
Grimsby Station	4886	58%	4760	67%	3144	38%	4209	37%
Victoria St, Grimsby	569	7%	1203	17%	2156	26%	3089	27%
High St, Cleethorpes	1752	21%	545	8%	856	10%	338	3%
Freeman St Market	335	4%	423	6%	440	5%	511	4%
Market St, Cleethorpes	812	10%	97	1%	1379	17%	230	2%
Station, Cleethorpes	61	1%	90	1%	229	3%	270	2%
Sea Rd, Cleethorpes	0	0%	10	0.0%	0	0%	601	5%
St Peter's Ave, Cleethorpes	15	0.0%	0	0%				
Riverhead Bus Stance, Grimsby	n/a		n/a		n/a		2268	20%
Totals	8430		7128		8204		11516	
Change from 2016	+18%							
Change from 2013	+3%		-13%					
Change from 2009	-27%		-38%		-29%			
Cleethorpes Night	2564		642		2235		568	

From the current observations, there are 8,430 passenger departures in a typical week from all ranks in the NEL licensing area. The bulk of these, some 58% are from the station rank at Grimsby. 21% are from High Street Cleethorpes, 10% from Market Street Cleethorpes, 7% from Victoria St Grimsby, 4% from Freeman Street Market and 1% from the Cleethorpes Station rank. A very small number of passengers were seen at the St Peter's Avenue rank in Cleethorpes. Sea Road saw no passengers.

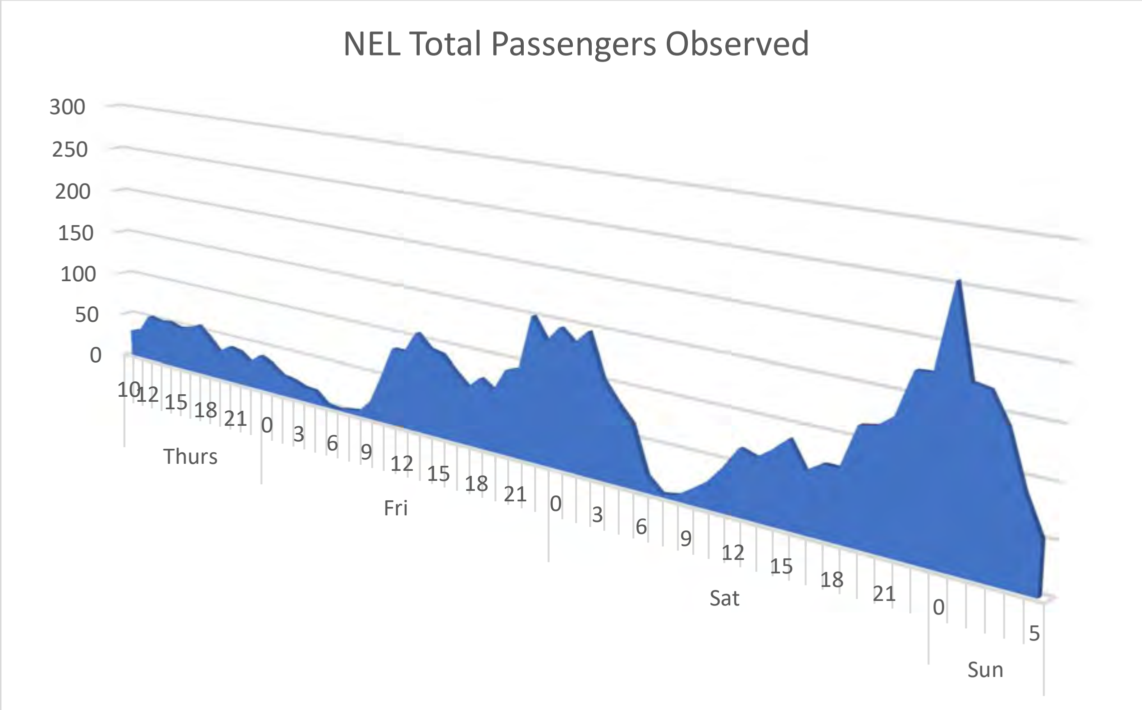
These 2020 flows may be an under-estimate based on the previous observations being undertaken in November, albeit on a similar mid-month weekend. However, comparison to the November 2016 values suggest 18% more passengers now than at that time. The flows are still below the level observed in 2009, although the main change in that respect was that the Riverhead Bus Station rank was still operating then, providing about a fifth of demand in that year.

The main change since 2016 appears to be significantly more usage of the ranks in Cleethorpes at night. Both Market Street, and more so High Street, have both increased their numbers of passengers. Victoria Street Grimsby saw reduced passenger levels, meaning High Street Cleethorpes was now the second busiest rank, with 21% of total estimated flows.

Freeman Street Market saw reduced flows, as did the ranks near the Station in Cleethorpes, whilst no passenger demand was observed at Sea Road this time although some small usage was observed at St Peter's Avenue during this survey.

Rank usage by location and time

The data collected was graphed to show variation over time. The graph below plots all data collected (but only for hours ranks were observed):



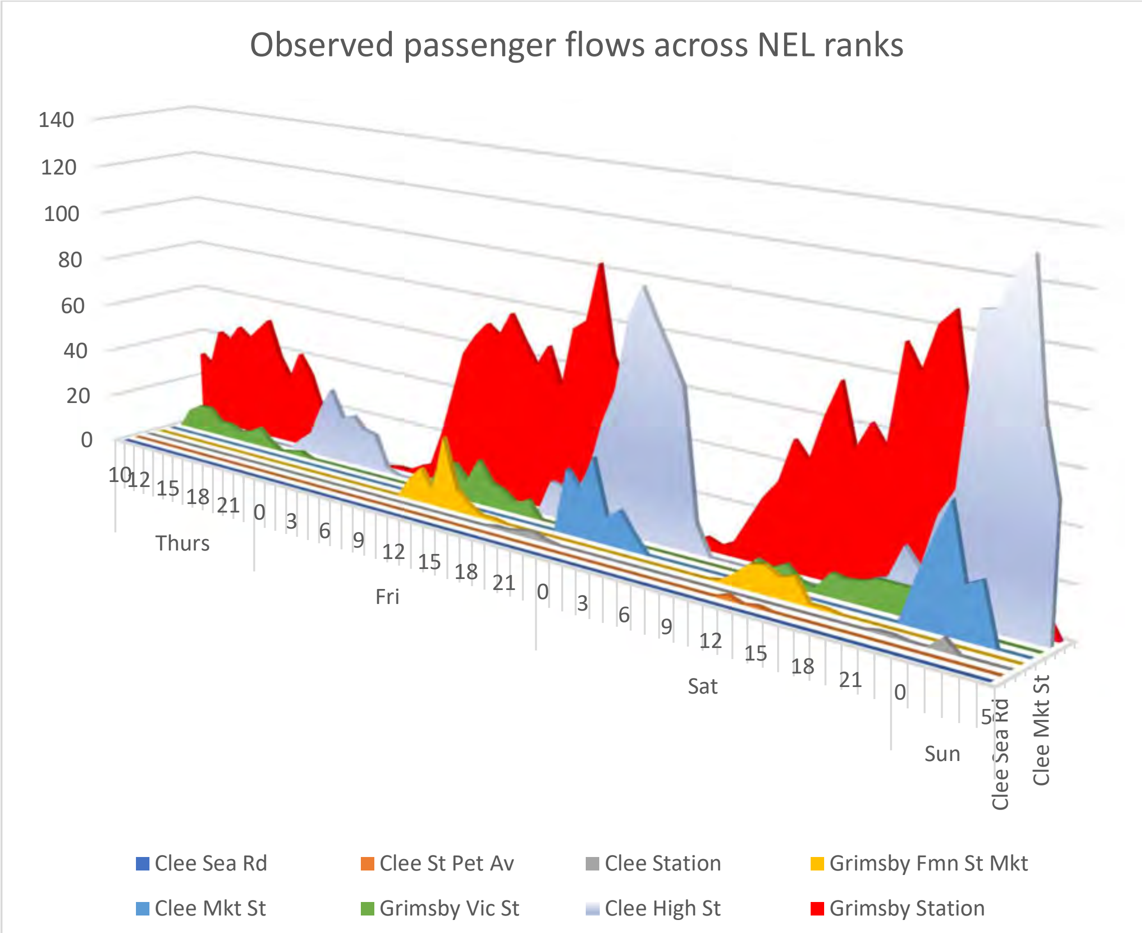
We understand that ranks were generally covered for all operational hours during the course of the survey, although some small flows may have been omitted through our sample choice. However, the general picture above shows the difference between Thursdays, Fridays and Saturdays in NEL. It does also show that there is no time over the observation period when there was no flow at any rank across the range of active ranks. There is little evening flow on the Thursday, but both Fridays and Saturdays see highest flows in evenings. The Saturday night flows are greatest, with a clear peak observable.

The Friday night peak was just under 60% of that of the Saturday. The Friday peak was in the 22:00 hour, with flows being 102 or more from that hour until the 03:00 hour the next morning (some six hours). On the Saturday night, flows were first 114 or more from the 19:00 hour right through to the 03:00 hour (nine hours), with the peak being 255 in the midnight hour.

The only other hour through our period of observation with more than 100 passengers was the 13:00 hour on the Friday.

The peak flow was four times the typical average flow across our survey period of some 71 passengers per hour. The sharp peak on the Saturday suggests demand in NEL is peaky, although there is also a strong disparity between night and day flows on both Friday and Saturday nights.

The graph below considers each rank through the days observed:



The graph shows the importance of the Grimsby station rank to passenger levels. It is the dominant rank throughout most daytime hours in the area. However, at night the High Street rank in Cleethorpes is dominant. This is true for each night including Thursdays, although the impact is strongest on Saturday. However, the total Saturday night impact is a combination of several locations, principally Market Street, Cleethorpes.

Freeman Street Market does make a valuable contribution to passenger flows but only during its limited hours of operation. At the time of the survey, the hours would have been 0900-1700 Tuesday, Friday and Saturday with the Food Court open from 0900-1400 on Wednesdays and Thursdays. This site was not observed on the Thursday. Interestingly, the profile of usage was different on the Friday and Saturday, with higher but peakier flows on the Friday and more consistently even, but overall lower, flows on the Saturday.

Victoria Street Grimsby sees moderate usage although mainly during daytime hours, but with some night flows. Again, similar to the Market, Friday daytime flows are higher than Saturday, but the night flows are more significant on the Saturday.

The ranks near to Cleethorpes station also see periods of usage, although this is less well-defined in terms of specific periods.

Surveyed hours with observed unmet demand

The individual hours at each rank were reviewed and only those with any average passenger delay at all were identified. These are sites where at least one passenger arrived and had to wait for a vehicle to arrive at the rank. This excludes any 'geometric' delay (i.e. where people have to wait for a vehicle to move up).

Of the total hours observed, 18% had delays recorded, although only 6% had delays that were a minute or more. Translated to passenger numbers, just 1% of all passengers had to wait in hours when the average passenger delay was a minute or more with a further 3% experiencing a delay when the overall average passenger delay was less than a minute.

The largest average passenger delay was just over 3.5 minutes in the midnight hour on the Friday. However, flows in this hour at that site were small. Most other hours with APD over one minute were ones where there were larger flows, although not high.

Using another measurement, 3% of all passengers waited for between one and five minutes, 0.3% had waits of six to ten minutes, and just two people, or 0.04%, waited between 11 and 12 minutes (the maximum observed wait recorded).

Overall, none of these are particularly high values. Further discussion of how significant these experiences of unmet demand are occur in the later Chapter.

Persons walking away from ranks

The rank observations saw at total of 144 passengers walk away from ranks during the course of the surveys. 57% of these were at Grimsby station whilst 31% were at High Street, Cleethorpes. Whilst some were reactions to no vehicle being there, others were friends that left once they had seen others board vehicles and some clearly made decisions not to use licensed vehicles even though present. Some may have left in private cars whose drivers had suggested they wait near the rank (although any actually observed to leave in camera shot would have been recorded as such).

Frequency of vehicle operation during rank survey

A test was undertaken to identify a sample of the vehicles active during the rank survey period. Plates were recorded at four locations (similar to in the previous survey) on the Saturday the rank observations were undertaken. Care was taken to keep the observations undertaken in such a way not to alert the trade to either these or the main rank work being carried out.

Some 168 different hackney carriage movements were recorded over the six hours sampled. The plates recorded were reviewed and any that related to non-issued or non-hackney carriage vehicles were removed. Just nine observations were found to be other than local hackney carriages. The bulk were plates not possible to observe for various reasons (e.g. two vehicles passing in quick succession, or difficult to read plates given the angle of observation).

During the course of the observations, a third of the local hackney carriage fleet was observed. However, the proportion observed was much reduced in each of the different samples. The highest proportion of the fleet observed in any one 1.5 hour period was 14% in the afternoon Station observations. 11% of the fleet were seen passing through the Sea Road roundabout in Cleethorpes between 22:00 and 23:30. 10% were observed passing through the Grant Street roundabout, Cleethorpes between 16:00 and 17:30, with the lowest proportion, 7%, observed in the early hours after midnight at Town Hall Street, Grimsby.

With respect to the frequency of all observations, a similar pattern applied to above, but even more focussed on the station. Nearly half of all the observations in our samples came from the 1.5 hours at the station. 22% were from Sea road, 18% from Grant Street and just 11% from Town Hall Street. This suggests the focus on the station rank remains, with a relatively low proportion of activity related to the central Grimsby night ranks, and more related to evening and night activity in Cleethorpes.

Compared to the 2016 survey, we saw 41% more vehicles in the 2020 observations. A key change was more activity overall near the Station rank. The proportion of the fleet observed was marginally less in 2016 at 30%, not a big change given the increased numbers in 2020.

The overall proportions of the fleet seen suggested a stronger emphasis on the daytime observations in 2020, with the late afternoon Cleethorpes proportion of the fleet increased from 6% to 10%. Night proportions were reduced (from 13% of the fleet in the Cleethorpes night and 9% in the Grimsby night to 11% and 7% respectively), again confirming the reduction in focus on night and increase in daytime levels of observations.

Compared to 2016 when two vehicles were seen in all four samples, three in three, nine in two and 53 once only, the 2020 focus saw no vehicle in all four samples, just one vehicle in three of the samples but 15 in two different locations and 61 in one, suggesting marginally more separate vehicles out, but less frequently.

Levels of vehicle observations in 2016, with one seen six times, seven four times, six three times, 14 twice and 39 once also in 2020 focus on the more vehicles but less frequent conclusion. The most frequent observation was two vehicles seen five times, ten four times, 16 three times, 12 twice and 37 just once. Three to four times tended to be the most typical in the 2020 observations.

Observed usage for those with disabilities

Of all the hackney carriage vehicles observed, 29% were noted as appearing to be wheel chair accessible vehicle styles (WAV). This is marginally less than the 33% proportion of the fleet that are actually WAV style. This suggests little difference in preference for service at the station for the different styles of vehicle.

During the period of the survey, 12 people at the Grimsby Station rank and two at the Market rank were observed leaving in wheel chairs. This is an increase from the total of 10 in 2016. Interestingly, the level of usage at the Market rank was the same, possibly suggesting established users.

A further 64 people, 52 at the station, 9 at the Market, two at Victoria Street and one at High Street, Cleethorpes were observed with disabilities that required assistance in to vehicles. This was a much higher level than the two observed in 2016.

4 General public views

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

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

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

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

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

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

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

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

For this survey, a robust total of 200 interviews were obtained, with 50 in Cleethorpes and 150 in central Grimsby, the only two locations with large enough concentrations of people to allow cost-effective on street interviews to occur. In 2016 a larger but broader sample was obtained, covering Immingham, Laceby/Healing and New Waltham/Humberstone with small samples, but still giving 200 or thereabouts from the Grimsby and Cleethorpes.

The resulting sample in 2020 was checked against the current 2020 estimates from the 2011 census, 2016 revision. The proportion of males interviewed was higher than the census estimate, some 51% interviewed were male compared to an estimated 49% in the census, with a corresponding marginally lesser amount of females interviewed. With reference to age groups, we interviewed more younger, fewer middle and a lot more older age group persons than the census would suggest (23% young compared to 20% census, 26% mid compared to 38% census and 52% older compared to 42% census). We do not consider this will have a severe impact on results but the differences will be borne in mind in the interpretation below.

In 2016, the overall sample was more strongly biased to female respondents (59%) but only interviewed 38% of the older group. Part of this resulted from including more smaller areas that it proved hard to obtain stable levels of different groups from.

When reviewing the area results, the Grimsby gender proportion matched the census values, with a similar pattern to the total for the age structure. The Cleethorpes sample (smaller and therefore less likely to readily match) saw 58% interviewees being men, but a slightly closer match to the age profile (22% young compared to 20%, 28% mid compared to 38% and 50% older compared to 42%).

91% of respondents said they were from the North East Lincolnshire area. The bulk of those not from the area gave Doncaster postal area codes, although there were a few further away quoted (including someone from Spain). In 2016 96% had claimed to be local. The area values were very similar.

61% had regular access to a car. This is slightly reduced from the 67% quoted in 2016. There was a strong difference between the areas in terms of car access – with Cleethorpes respondents saying 76% did, whilst Grimsby respondents said just 56% did.

For the full sample, 40% said they had used a local licensed vehicle in the last three months. This compares to the 90% saying they had used a taxi in the 2016 survey (but this would be higher as the question was not time related). Again the area results were very different – with 30% in Cleethorpes and 43% in Grimsby, a result clearly in line with the car access levels.

In terms of overall use of licensed vehicles, the largest proportion, 37% said they never used them. 22% said once or twice yearly with just 4% saying three or more times weekly. This resulted in an estimated usage level of 1.4 licensed vehicle trips per person per month – not high. In 2016 41% had said 'less than once a month', suggesting perhaps a reduction in usage since that time.

In terms of local differences, 42% never used licensed vehicles in Cleethorpes with 35% in Grimsby. Trip estimates ranged from 0.5 for Cleethorpes to 1.7 for Grimsby. Once or twice yearly values were consistent with this pattern – 28% in Cleethorpes and 19% in Grimsby.

For hackney carriages, the top value was that 40% could not remember when they had last used a hackney carriage (marginally reduced from the 44% of 2016), with the highest actual percentage usage being 14% for once or twice yearly, and just 3% saying three or more times weekly. The resulting estimate of usage is again low at 1.0, but this value does suggest high relative usage of hackney carriages, being 68% of the total usage of licensed vehicles.

Again the local pattern of higher usage in Grimsby is supported – Cleethorpes respondents said 63% could not remember when they last used a hackney carriage but this in Grimsby was 32%. This was also reflected in the 0.1 usage estimate for Cleethorpes for hackney carriages with a much stronger value of 1.3 for Grimsby.

People told us how they obtained licensed vehicles. 63% gave a response, with one giving three responses and 31% giving two responses. For the full area result, 59% of responses said they telephoned (increased from the 52% of 2016). 37% got them at a rank (up from 18%), 3% used an app (none used one in 2016) and 1% hailed (same as in 2016). When considering specific responses, 47% mainly telephoned, 18% mainly used ranks, 3% mainly used apps with 30% using mainly a mix of rank and telephone, and just under 1% each using only hail, a mix of telephone and app, and a mix of rank, hail and telephone.

For the two separate area results, the method of getting licensed vehicles was not too dissimilar – with the rank value 38% for Grimsby and 34% for Cleethorpes. The main difference was no use of apps in Cleethorpes. This arose because the main provider of an app is mainly used in Grimsby (see below).

Comparison of the stated usage with the frequency of usage, comparing 18/48% for hackney carriage stated method of obtaining with 68% actual usage suggests those using hackney carriages use them more frequently than other methods. The difference between Grimsby and Cleethorpes is very strong with Grimsby estimates being 72% by hackney carriage whilst for Cleethorpes the level is just 27%.

47% of those interviewed gave at least one name of a company they phoned, or an app they used to obtain licensed vehicles. Of these, 7% named three companies, 28% two and 66% just one company. This suggests there is competition in the area, but also a reasonable level of satisfaction that means people are happy just to be aware of a single number in most cases.

15 different names or numbers were quoted with regard to those they phoned to obtain licensed vehicles, marginally less than in 2016 but in the same order of magnitude. All but two were traceable, with two phone numbers linked to companies already named, and two both-named companies who made it clear they were the hackney carriage and private hire arms of related companies. Between these two companies, they obtained the most mentions (26%) although in several cases where people mentioned more than one company, they mentioned both these names, suggesting people are not aware they are the same. This was an increased level from the combined 15% in 2016.

The second largest company, and the one with the most references in its own right, took 24% of mentions. This was increased from the 16% they obtained in 2016. Two other companies took 17% and 15% of mentions (one only when the phone number is included as well as the name). Another took 9% shared between its name and number. All others took 3% of mentions or less. This confirms a good level of competition occurs in the area.

The trends suggest that the top two companies (in fact three names) have increased their share of the bookings of licensed vehicles since 2016, one by use of an app, and the other by apparent promotion of the hackney carriage side of the business in some manner. On the opposite side, the top company mentioned in 2016 dropped from a 29% share to a 13% share, the reason for which is unclear.

Just one, local-based app was mentioned by a small number of respondents (just 2.5% of the total respondents). Whilst one of these people also named the company, the remaining 80% only mentioned use of the app. Interestingly, this company is the top named mention in its own right. This is a clear change from 2016 when, even though asked regarding apps, no response was given.

The importance of companies varied between the two areas – with a different dominant operator but the mixed fleet operator actually had similar levels of usage in both areas.

A very low level, 3%, of people responding said they could not remember seeing a hackney carriage in the area, suggesting hackney carriages are well known and distinguished in this area. The level of not remembering seeing a hackney carriage was starker, 9% in Cleethorpes and just 1% in Grimsby.

This low level overall is a strong improvement from the 15% quoted in 2016 suggesting improved views of the hackney carriage fleet. However, a very much higher level of 40% said they could not remember when they last used a hackney carriage in this area (this was very similar at 44% in 2016).

People were then asked about the ranks they were aware of in the licensing area. 52% of those interviewed provided at least one rank and if they used that location or not. Of the respondents, 22% provided three ranks, 40% provided two and 38% gave a single response of a rank they were aware of.

The initial response for the area provided 25 different names for rank locations across the area. This was slightly reduced from the 28 given in 2016. Of all the rank mentions, 45% named a location and said they used that location with the slightly larger proportion naming locations but saying they did not use them. This level was similar in both areas.

The most mentioned rank was that at Grimsby station, with 44% of all mentions (up from 36% in 2016). Just over half that mentioned it said they used it. Victoria Street, Grimsby had 17% of mentions, with an exact split between people using it and not. Market Place, Cleethorpes obtained 6% - of which 75% said they actually used that rank (but down from the 14% quoting that in 2016), with High Street, Cleethorpes gaining 4% (just under half saying they used it)(but the same value of knowledge as in 2016).

Some people gave general locations whilst others named places that were formerly ranks or could not be readily identified as rank locations. The most notable was the Diana Princess of Wales Hospital, where 17% said they were aware of a rank and used it.

Cleethorpes Station obtained 2% (half used it) whilst Freeman Street got 1% (but this person did not use it). No other known ranks were specifically named. Riverhead remained as a location people were aware of, but none of them used it.

Most of the single mention locations that we could not tie down as ranks saw people say they knew of the location but did not use it, although there were some specific names where people said they did use the location. Two of these were locations near to the Victoria Street rank (The Barge, Casper's) and therefore related to that location.

In terms of differences in rank knowledge, the overall order was very similar although responses to Grimsby ranks were higher in Grimsby as might be expected and vice versa for Cleethorpes.

Eight people said why they would not use ranks. 75% said they used the bus instead, whilst the remaining 25% said using ranks was too expensive.

People were asked to rate various aspects of their recent trip 'in a taxi' (having been asked to focus on hackney carriages). Half those interviewed provided a response. All responses apart from one (with respect to price), saw the highest score being for 'very good'. There were no elements that scored 'very poor' at all. Vehicle aspects scored best, with vehicle repair scoring marginally higher than cleanliness. Neither of these aspects scored any poor or very poor scores at all.

The driver elements also scored highly, although each had a very small element of 'poor' score, but never higher than 3% (for driver appearance). Driver behaviour had the highest positive score, with knowledge of the area the lowest (but still 50% said 'very good').

Comparing areas, Grimsby respondents generally had a wider range of appreciation, with most Cleethorpes responses being either good or very good, apart from driver knowledge of area which saw 29% in Cleethorpes say was average.

As is often the case, price was the key item people were less appreciative of. Just 20% felt price was 'very good'. 38% said 'good', 36% average and 6% said poor. However, even this aspect though clearly not scoring as highly, had no 'very poor' scores. Grimsby respondents were generally less concerned with price than those in Cleethorpes.

Overall, this suggests a very well appreciated licensed vehicle service in the North East Lincolnshire licensing area but again with differences between the service provided in the two main areas.

A few comments were made about items people felt were poor. Two made comments about 'foreign drivers' either having poor local knowledge or overcharging. One simply complained their driver had been rude. One felt drivers were sometimes scruffy and another said they had several experiences of drivers not helping people in wheelchairs. These were, however, all individual views and comments and not significant.

42% of those responding to matters that might encourage them to use hackney carriages or use them more often said cheaper fares (increased from 35% in 2016). 19% said more hackney carriages they could phone for (16% in 2016). 9% said better drivers, 3% more hackney carriages to hail or obtain at ranks (much reduced from the 10% of 2016) and 1% better vehicles. 16% said nothing would encourage them to use hackney carriages or use them more. For Cleethorpes, there was a strong reaction that cheaper fares were the main and almost only matter that would increase their usage of hackney carriages.

53% felt local hackney carriage fares were 'fair'. 43% felt they were cheap whilst just 1% said they were expensive. However, despite other comment, Cleethorpes response to this question suggested they felt fares were cheap (79%) whereas this proportion was 34% for Grimsby. 61% said 'fair' in Grimsby whilst in Cleethorpes this value was 21%. Given the lesser use of hackney carriages this suggests this answer in Cleethorpes relates to the vehicles actually used, i.e. private hire.

The issue of latent demand was considered. Six said they had given up waiting at a rank, but one of these was not a rank location. This implies the rank-based latent demand value is 1.025. Five had given up hailing, both in legitimate places giving a hailing-based latent demand value of 1.025, and a combined value of 1.05. This was supported by 87% saying they felt there were sufficient hackney carriages in the area overnight. This value was similar for both locations.

All those responding felt safe using daytime licensed vehicles, with a slight reduction to 96% feeling safe at night. Only two responses were made to what might make people feel safer. One said 'nothing' and the other said they would simply avoid travelling if they did not have confidence they would feel safe. There was no real variation between the two locations.

84% of those responding said they did not themselves need, nor did they know anyone who needed an adapted licensed vehicle. This is a relatively low value compared to many other responses, suggesting relatively high need of such vehicles. It is also lower than the 89% quoted in 2016 suggesting increased need. Most of those that said there was need had requirements for a WAV style (2%), with the bulk saying they knew someone who needed a WAV (12%). A small number (2%) said they needed some other adapted vehicle, not a WAV. These values were again similar in both locations.

In 2016, the needs for different vehicles either WAV or other was a lot more equal, suggesting not only an increased need, but also a focus on the more WAV style of vehicle.

58% of those interviewed gave their view about if they might use an electric powered hackney carriage. 76% of these had no preference, with 23% saying they would use one as long as it did not imply increased costs, with one person (1%) saying they would pay up to 10% more to use one.

A similar proportion of interviewees gave their view about use of debit or credit cards. 60% said they would still pay in cash. 37% would be happy to use as long as there was no increased fare resulting. 4% would use this option for every journey.

61% answered a question if they felt people in North East Lincolnshire that had disabilities got a good service from hackney carriage vehicles and drivers. 58% felt they did, 40% did not know and 2% said they thought people did not. One said they were aware of someone that had waited a long time for a WAV style vehicle whilst the other person said they felt drivers appeared sometimes reluctant to help with the wheelchair. There was a difference in the two locations, with the Cleethorpes saying 41% felt they did whilst Grimsby respondents said 62%. This might relate to the higher level of hackney carriage usage and availability in Grimsby, with a much higher WAV fleet percentage.

5 Key stakeholder consultation

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

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

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

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

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

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

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

With regards to this current review, the onset of the COVID-19 pandemic at the end of March 2020 made contacting many key stakeholders either inappropriate, difficult or often impossible. The responses below cover those possible during the preparation of this Final Report. The impact of this on the robustness of the results is discussed in context within the synthesis section of this Report.

Disability

A local health service contact was spoken to. They told us that their major issue in the past had been obtaining up to date information for those needing to obtain services from hackney carriages for their disabled clients. They felt the recent list provided had helped enormously in ensuring those needing disabled accessible vehicles could get them when they needed them. They told us their main service was giving advice to the public who called their Single Point of Access service for advice. They also used contacts to find transport for their own clients when necessary.

They confirmed they did not have any specific contacts they could provide us to give their experience or views. They did not think that any offer of any meeting with people would be taken up, even if they were able to suggest any potential candidates.

However, they provided us details for Carers Support Service and another group that might be able to provide specific contacts. The lockdown prevented further contact.

Rail and other transport operators

The authority has eight national rail stations, although six operated by Northern have relatively low frequency services. Only the two Trans-Pennine Express operated stations at Grimsby Town and Cleethorpes have ranks nearby, with the third largest station only seeing 39,172 entries and exits in the last year (year ending March 2019). This station has the 2,070th highest flow whilst the least busiest, New Clee, is 2,472nd with just 1,720. There are currently 2,566 stations listed.

In contrast, Grimsby Town is 948th (down from 943rd at the time of the last survey), and saw 456,768 entries and exits in the last available year. Flows of passengers had increased 8% since the last survey, and 38% since the data was first collected in 1997/98. This equates to around 4,568 passengers leaving the station per week. For Cleethorpes, the current position is 1,192nd, up from 1,211th at the time of the previous survey. This station saw 14% passenger growth since the last survey, and 85% since start of information collection. The annual entries and exits of 296,002 implies about 2,960 passengers leaving the station per week.

Due to the imposition of the national lockdown towards the end of March 2020, no further contact with key stakeholders proved possible.

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. For this study, 545 letters were issued. This covered all drivers, both hackney carriage and private hire. The response was 6%, which is good and reasonable, albeit less than the 12% from the 2016 survey.

All responses were received by Monday 16th March before any impacts were felt of the Coronavirus and therefore all results are fully valid in the context of the overall survey.

In terms of split between hackney carriage and private hire, 45% of respondents said they were hackney carriage drivers. This almost matches the 40% of drivers who are registered as hackney carriage, suggesting a very slightly higher level of response from that element of the trade, as might be expected. However, given that the survey relates mainly to need for hackney carriages, this is in effect a very good response from the private hire element of the trade. This split also suggests this survey is of relevance to private hire given the level of response. In 2016 the dominant response was from hackney carriage (58%) although this is not too dissimilar a share.

The level of responses from both parts of the trade means that relatively realistic comparisons can be made between the general statistics obtained from each part of the trade. Hackney carriage drivers had much longer lengths of service – nearly 14 years compared to just under 10 for the private hire respondents. Longest service was 28 years for hackney carriage and 18 years for private hire – both good levels of experience but again suggesting more for the hackney carriage element. Compared to 2016 there may have been some retirements leading to a slightly reduced level of experience now.

However, when comparing working weeks, the average days and overall spread of days' work for both parts of the trade was effectively the same for both parts of the trade at around 4.7 days each. A third of hackney carriage drivers said they worked five days whilst this proportion of private hire said they had worked six days, with a further 28% saying five days. However, 13% of hackney carriage drivers said they worked seven days compared to just 6% for private hire.

The quoted hours worked suggested overall longer hours for private hire in terms of the maximum worked (67 hours compared to 60), and also on average private hire worked more hours (42 compared to 35 hours). Both the maximum hours and average hours have reduced compared to 2016 (80 maximum and 46 average in 2016).

The main issue affecting when people worked was family commitments (29%) followed by equal shares (18% each) for working busy times, avoiding disruptive passengers, and simply 'preference'. 9% said their working hours were affected by them sharing a vehicle with just 2% avoiding heavy traffic. There were no clear 'other' responses that dominated this final 5% of those responding. The responses were very similar to 2016.

88% owned their own vehicle. Just 3% said someone else also drove their vehicle. This response was equally split between the other person using the vehicle for days and weekends. Again, the response was remarkably similar to that for 2016.

64% accepted pre-bookings – reduced from the 74% of 2016. A small number of these were independent hackney carriages accepting their own pre-bookings. Two companies were named that gave work to both hackney carriage and private hire vehicles (same as in 2016). One of these obtained 38% of the mentions (exactly the same as in 2016) whilst the other gained 14%. A third, private hire only operation saw 14%. All other quoted links only obtained one quote each (5% of the total).

The hackney carriage respondents were almost evenly split between those that took pre-bookings and those that did not. This suggests a relatively high proportion of hackney carriages remain independent and effectively principally rank-based for their hires. On the private hire side, 78% accepted pre-bookings suggesting the remainder must be niche operations focussing on guaranteed work for specific clients.

Although 14 different names were given for rank locations serviced, in reality these were just eight rank locations. There were effectively five different names given to the Station rank in Grimsby. In total these added up to 35% of all rank mentions. The next largest site quoted, with 19%, was Cleethorpes High Street. Victoria Street was quoted by 15% albeit in different guises. The two ranks that make up the Cleethorpes Station location gained 6% of votes. Market St Cleethorpes gained a similar level, as did Bethlehem Street. Garibaldi Street gained one vote, 3% of the total.

This suggests drivers do use the bulk of ranks available to them, although overall total knowledge is pragmatic rather than specific in name terms. About a third of mentions were for Cleethorpes ranks, with the High Street the dominant one used. There were no mentions of Sea Road nor the other two ranks at the southern end of the town. The lesser used locations along the main Grimsby axis from the station were also mentioned albeit only by a few.

There was an almost even split between those saying there were issues with rank operation and those not, with a slight bias towards there being no issue. Key issues related to the shortage of space for the popularity of the Station rank in Grimsby, but other issues were also raised. One said the Sea Road ranks in Cleethorpes had not been remarked. Another said there were not enough spaces when ranks were operating in High Street and Market Street Cleethorpes.

Many multiple responses were given in regard to how people obtained fares. For the full sample and all responses, telephone gained 25%, ranks and phone apps 22% each, hailing 16% (very high) with school contracts 9% and other (half of which were direct office bookings), 5%.

The only option that anyone said they got all their bookings from was the five who said they depended totally on an app. None of the other options, including rank and phone, gained such total dependence.

71% of respondents felt fares were about right. 23% felt they should be increased and 3% said reduced.

94% of those responding felt the number of hackney carriages should continue to be limited. This included all but one private hire who did not respond, and one private hire that felt the limit should not be retained. This is a very high support for the limit albeit less than the 97% in 2016.

97% felt there were enough hackney carriages licensed.

Many suggested how this benefitted the public. Two suggested it enabled people to get to know the current trade by keeping the trade stable and giving long term experience in the driving fleet. Many said it kept congestion from getting worse, but suggested there were already too many vehicles and that congestion issues were already severe. Many confirmed there was no need for more vehicles.

Various other comments were provided. Many said there were too many vehicles and one suggested private hire vehicle numbers should also be limited. One raised issues that they thought others overcharged and that customers told them that regularly. Another wanted action about too many customers leaving without paying their fare. One asked for more help with moving to electric vehicles.

In summary, a good level of response was obtained which was typical for a driver survey and definitely had no impacts from the impending coronavirus issue. There was very strong support for the limit and nearly everyone agreed there were sufficient vehicles, if not too many.

The following question was posed to respondents:

"NEL is reviewing the current licence plate position condition and considering having the Council licence plate set alongside the vehicle registration plate. This is due to increasing issues with the ability of licence holders to comply with the current condition as a result of modern vehicle design"

Just over half responded. 29% were opposed. Some suggested the suggestion would be more damaging or difficult to achieve. 12% had no preference. 24% said the current system was acceptable and no change was needed, with one suggesting you could easily adapt to work with current options for most vehicles. 6% suggested a smaller plate. 29% were in favour. One of these respondents said the current system damaged their vehicle to achieve whilst another agreed but asked if waste could be reduced by not completely replacing the plate on every anniversary.

7 Evaluation of unmet demand and its significance

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

	2020	2016	2013	2009
Average passenger delay	0.1	0.13	0.16	0.28
% passengers in hours with average queue over a minute	21.57	2	3.03	0.08
% passengers in off peak hours with any delay	2.58	14	3	1
Seasonality factor	1.2	1	1	1
Peak factor	0.5	0.5	1	1
Latent Demand factor	1.05	1.028	1.087	1.16
	3.5	1.92	2	0.03

The table shows that the current level of unmet demand has increased since the 2016 survey, although the overall level remains a long way from the level of the index of 80 that would be considered to be unmet demand that would be counted as significant. This means the current limit can be retained, and at the same level.

In terms of the components of the index, average passenger delay and the proportion of passengers travelling in off peak hours with any average passenger delay have reduced. The area retains its peaky nature of demand. Latent demand has increased, the seasonality factor is increased to factor up for the observations being in a low-demand month (February), but the major increase has been in the proportion of passengers travelling in hours when there was APD of a minute or more. This has gone up from a value of 2 to nearly 22. This increase is consistent with the rise of latent demand. It is also consistent with the overall increased observed levels of passenger demand.

Further discussion is provided in the synthesis section below.

8 Summary, synthesis and study conclusions

This Unmet Demand Survey on behalf of North East Lincolnshire Council has been undertaken following the guidance of the BPG and other recent case history regarding unmet demand and its significance. This summary draws together the salient points from the preceding chapters and then compares and contrasts the different elements to provide a comprehensive picture of current operations and the impact of the present restriction on hackney carriage vehicle numbers. This moves forward to conclusions for the current review, followed by recommendations in the following Chapter.

Background and context

This latest snapshot review of the impact of retaining a limit on the number of hackney carriage vehicles in the North East Lincolnshire licensing area was carried out between November 2019 and mid-March 2020. On street pedestrian views were obtained on a Tuesday and Wednesday in February 2020. The rank observations were also during mid-February, on a similar weekend to the previous survey albeit that had been undertaken mid-November 2016. The driver survey closed mid-March 2020. Some key stakeholders had been contacted by the time the lockdown occurred in late March 2020 although it then became difficult to complete that element of the review. Further discussion of this occurs in the summary and synthesis below.

NEL has good reference to licensed vehicles within its current Local Transport Plan policy document, valid from April 2011 and continually refreshed (most recently with the Delivery Plan 2019/20 to 2021/22. A key aim is to ensure an appropriate supply of licensed vehicles with focus on meeting needs of those with mobility and other disabilities. Although it is clear those in the policy sections of the Council are committed to developing services, their link to the Licensing section appears to need strengthening. The licensing section has sought to increase the level of WAV style vehicles in the fleet using appropriate policy encouragement. These policies apply both to vehicles and to those that drive them and their decisions regarding their vehicles (specifically in relation to drivers that have WAV but obtain medical exemptions for assisting WAV users).

Current population for 2020 is 159,507 with 20% of those 16 or over under the age of 30, 38% between 31 and 55 and 42% over 55. 49% of this 16+ population are male.

The NEL limit on hackney carriage vehicle numbers was removed between 2005 and 2009. When restored, the limit was set at 235 but reduced to a target of 220 in 2012. The subsequent survey in 2016 found no significant unmet demand whilst this current survey was delayed into 2020 until the new rank in High Street Cleethorpes had been established. Fortunately observations pre-dated the late March 2020 lockdown, providing an excellent snapshot of demand in advance of that major change to supply and demand patterns, albeit being at a normally low point in the annual demand profile.

The impact of removing the limit in 2005 was a 97% increase in hackney carriage vehicle numbers. A lagged response saw private hire vehicle numbers in the area drop by some 30% since when they have continued to decline, with marginal increase in early 2020, although their numbers remain 28% below the level of 1997 and 40% down on the peak number of 2007. After the limit reduction numbers of hackney carriages did reduce to 213 but the current level has been stable at 230 since the time of the last survey. Driver numbers follow a similar pattern but appear a little more volatile. For both vehicles and drivers there appears to be more stability in the hackney carriage element than in the private hire part of the trade.

Removal of the limit took WAV style vehicle levels to a maximum of 47% in 2013. By the time of the last survey, the level had dropped to 26% but policy changes helped restore this to the current value of 33% of the hackney carriage fleet being WAV style. The level of WAV in the private hire fleet is not known but is believed to be small given the strength of the WAV element of the hackney carriage fleet. This level is well above the national mixed vehicle style average proportion of 23% WAV in the hackney carriage stock.

Even when using the harsher measure of proportion of WAV in the total fleet, NEL has 14% of its total fleet WAV. This places NEL 100th equal out of the 292 English licensing authorities at the time of that survey (March 2019) with regard to overall WAV provision. This is a very good provision.

Rank observations

Rank provision has now been revised recently across the whole NEL licensing area. Most recent change saw addition of the additional rank in High Street Cleethorpes directly outside a major demand generator.

The observations covered 211 hours of rank operation over the Thursday to Sunday period in mid-February 2020. Observation hours were agreed with the licensing section and overall results suggest that most active periods were covered during the sample observation period.

77% of vehicles observed at the ranks were local hackney carriages. 3% were local private hire. The major remaining proportion of vehicles observed, some 17%, were private cars. Many of the observed private vehicles were at lesser used ranks, particularly many sites that have not benefitted from the recent remarking of ranks. Several Cleethorpes ranks suffered badly, as did the Freeman Street Market rank. On the contrary, recently remarked locations see very little abuse although this is also helped by higher levels of hackney carriage activity.

Both vehicle activity levels and the actual rank surveys confirm that the main rank in the area is the Grimsby Station rank. This sees 55% of all hackney carriage activity and 58% of passengers during an estimated average week. High Street Cleethorpes sees 29% of vehicles and 21% of passengers. This is supplemented by Market St Cleethorpes with 10% of passengers, Victoria Street Grimsby with 7% and Freeman Street market rank with 4%. The rank near Cleethorpes Station saw 1% of estimated weekly demand with a very small usage observed at St Peter’s Avenue Cleethorpes. No passengers and just a few vehicles used Sea Road, Cleethorpes.

In respect of trends, even though the current rank observations were in February, typically a low period for rank-based demand, comparison to the averages from the previous survey in mid-November suggest an 18% increase in overall observed demand. Grimsby station rank passengers were up 3%, but the major increase was in night demand at the two main Cleethorpes night ranks. These even exceed levels observed in the 2013 survey, both of which were much higher than levels observed in 2009 and 2016. The current change seems related to the improved rank provision now.

NEL across its full set of ranks always has some rank-based activity day and night. However, Fridays and Saturdays have higher flows than Thursday, with a very key element being the night demand which is high on Friday night / Saturday morning but much higher again on Saturday night / Sunday morning. The overall rank demand profile is a peaky one given a large spike even within the overall Saturday night peak.

The average flow over the hours observed was 71 passengers with just a single hour with over 100 passengers at Friday lunchtime, followed by six hours with 100 or more on the Friday night / Saturday morning and nine on the following night / morning. The peak flow was four times the average.

Whilst the station rank is key to overall passenger levels, the contribution of the High Street Cleethorpes rank dominates night demand, but is supplemented by Market Street rank Cleethorpes. Both Victoria Street, Grimsby and the Freeman Street market rank provide valuable contributions to overall rank-based demand.

Unmet demand levels are low. Just 1% of all passengers ended up waiting in hours when the average passenger delay (APD) was a minute or more. A further 3% ended up waiting in hours with some APD but less than a minute. Beyond those recorded travelling a further 3% were observed leaving areas around ranks without taking a licensed vehicle although many of these did not seem to have intended to use a hackney carriage in any event.

Over the sampled plate observations, a third of the local hackney carriage fleet was observed active (on the busiest day). This was marginally up from the 31% of the previous similar survey. The highest level in any single period observed was 14% in the Saturday afternoon Grimsby station sample. This compared to 11% seen in Cleethorpes between 22:00 and 23:30.

Evidence suggested the highest proportion of vehicles focussed on servicing the Grimsby Station rank. This level appeared much higher than in 2016 – despite the extra demand at night in Cleethorpes. In fact, there seemed an overall intensification of vehicle activity on daytime operations. There also seemed to be more vehicles active, but less intensely.

The level of observed WAV in the rank observations was 29%, marginally less than the proportion in the fleet.

Observed usage by people in wheel chairs was slightly increased from 10 in 2016 to 14 now. Interestingly, the same number of observations were seen at Freeman Street market rank in both years, perhaps suggesting established users there. The level of people with other disabilities observed was significantly higher than in 2016. Most were at the station rank.

On street public views

A robust and generally census consistent sample of 200 interviews in the streets of Grimsby and Cleethorpes was obtained. The only difference to census values was slightly more men and reduced levels for the middle group in age terms. The previous coverage of outer areas was not repeated this time. 91% said they were local to the area. 61% had regular access to a car, reduced from the 67% of the previous survey. The value was slightly lower in Grimsby but up to 76% in Cleethorpes, suggesting less potential need for licensed vehicle usage in Cleethorpes.

43% in Grimsby and 30% in Cleethorpes said they had used a local licensed vehicle in the last three months. Across both areas the average was that 37% never used licensed vehicles. Total estimated monthly licensed vehicle trips based on quoted frequencies were just 1.4 per month. These ranged from 0.5 in Cleethorpes to 1.7 in Grimsby.

For hackney carriages, 63% in Cleethorpes and 32% in Grimsby could not remember when they last used a hackney carriage.

With quoted frequencies, the estimate of hackney carriage trips per month was 0.1 for Cleethorpes and 1.3 for Grimsby, 1.0 overall. These figures suggest 72% of licensed vehicle trips in Grimsby are by hackney carriage but a much lower 27% in Cleethorpes.

However, in terms of how people got licensed vehicles, the levels of quoted rank usage at 38% for Grimsby and 34% for Cleethorpes are very similar. The average of 37% across the areas is up from the 18% identified in the previous survey. For this survey there was a strong growth to 3% saying they used apps, although this was entirely concentrated in Grimsby.

Results from identifying companies phoned to get vehicles suggest competition exists in the area but that people are also highly satisfied with companies they currently use. The dominance of the top company had increased from 15% in 2016 to 26% now. This company comprised two elements, a private hire and a hackney carriage arm. Another company obtained 24%, again increased in level from 2016. Three others took 17,15 and 9% of mentions with the many others taking no more than 3% each. It appears that by use of an app in one case and by promotion of the hackney carriage arm in another that the market share of the top two/three companies has increased. However, conversely, the company with top share in 2016 lost share from 29% to 13%.

Introduction of an app is a clear change to 2016 and has clearly benefitted that company. Further, there are no other apps mentioned and certainly no evidence of any national-based influence.

The lack of appreciation of hackney carriages in the area has reduced strongly from 15% in 2016 to 3% now, although there is a strong disparity between Cleethorpes (9%) and Grimsby (1%) views.

With respect to ranks, 45% named a location and said they used it. Grimsby Station saw 44% of mentions, increased from the value of 36% in 2016. Victoria Street Grimsby was second with 17%, 6% for Market Place Cleethorpes and 4% for High Street, Cleethorpes.

Views about licensed vehicle services focussed on high levels of appreciation, although highest in Cleethorpes. Price was the most negative issue, but even this was not particularly a strong concern. Grimsby respondents were less concerned about price than those in Cleethorpes. Overall the licensed vehicle service appears well appreciates although with differences between the two main areas.

As is often the case around the country the main item that might increase hackney carriage usage was reduced prices. This was the only matter that might increase usage in Cleethorpes. However, overall 53% felt fares were fair and 43% felt them cheap.

There was a significant reduction in the level of people suggesting they would like to see more hackney carriages at ranks that ties in with other evidence that more vehicles are focussing on the Station rank than in 2016.

87% across the area felt there were enough hackney carriages at night. The combined latent demand factor was 1.05.

People generally felt safe using hackney carriages day and night, with a slight reduction for night travel.

Response about need for adapted vehicles suggested potential need in NEL might be higher than in other places. This focussed on need for a WAV rather than any non-WAV provision. 58% felt people with disabilities got good service from hackney carriage vehicles and drivers.

23% would use an electric powered vehicle as long as it did not increase cost. 37% would use credit card machines on the same basis, though 60% said they would still pay cash.

Key stakeholder views

One disability representative felt that live and relevant provision of up to date contact details for WAV style vehicles had improved access to these services significantly. They did not feel there was any need for wider research given this improvement.

Grimsby Town Station has the highest rail station flows out of the eight national stations in the area, and in the latest information was 948th highest in the list. This flow has increased 8% since the last survey. This compares with 3% observed growth in hackney carriage passenger demand from that location.

Cleethorpes, the 1,192nd largest station, saw 14% passenger growth since the last survey, but its low frequency of services means very few hackney carriages regularly wait at the nearby rank.

Other than this, the imposition of the lockdown towards the end of March prevented any further consultation with key stakeholders. The impact of this on the robustness of the survey is discussed below.

Trade views

Response to this survey to all licensed drivers was 6%, good, but lower than the 12% from 2016. These were all received well before any impact of the COVID-19 pandemic on operations.

The response was 45% hackney carriage drivers, very similar to the proportion of 40% of the driver cohort. This also implies a very strong private hire response given the level of such response to demand survey questionnaires is usually very low.

Hackney carriage experience levels were marginally higher than private hire. There was some evidence of reduced experience levels possibly suggesting some retirements since the previous survey.

Days worked were similar at 4.7 days but private hire seemed to work longer and more hours on average, albeit at a reduced level to 2016.

18% suggested their hours were affected by trying to avoid disruptive passengers. Most responses were very similar to 2016.

88% owned their own vehicle and 64% accepted pre-bookings, a level reduced from 2016. As in 2016, two of the companies named were mixed hackney carriage / private hire fleets and a third pure private hire. Between them these three took about two thirds of the mentions. About half the hackney carriages appeared to be independents. Several responses clearly came from niche private hire operations.

In terms of ranks, Grimsby Station was most popular followed by High Street, Cleethorpes. Victoria Street saw 15% of mentions albeit in various different guises. Most other known active ranks were mentioned as well as one of the central Grimsby little used ranks. The only mention of Sea Road Cleethorpes was someone saying it had not been re-marked.

With respect to obtaining fares, 25% were from phone, 22% from rank, 22% from app and 16% hailing and school contracts 9%.

71% felt fares were about right and 23% said they should be increased.

94%, including most private hire, supported retention of the limit. 97% felt there were enough hackney carriage vehicles.

Amongst many comments were many stating there were too many vehicles with one suggesting private hire vehicle numbers also needed restricting.

For the specific question added regarding licence plate siting, 29% were opposed to the idea, 24% accepted the present system and 29% were in favour.

Formal evaluation of significance of unmet demand

Although the current level of significance of unmet demand has increased from the last survey, the index remains a very long way from the level that would see this being deemed significant. Within the index, average passenger delay and the proportion of people travelling in off peak hours with delay have reduced. Latent demand has increased and the seasonality factor has been set at 1.2 to allow for observations being in February. The major change has been the increase of the proportion of passengers travelling in hours when average queues were a minute or more. This is consistent with the increased observed demand and the increased level of latent demand.

Synthesis

The level of hackney carriages in the area has remained stable since the last survey, whilst the general trend in reduction of private hire vehicle numbers has generally continued. This implies the proportion of hackney carriage vehicles compared to the total fleet has increased. People have noticed this and the level of those not having seen a hackney carriage in the area has reduced, much more so in Grimsby than Cleethorpes.

The revision and modernisation of rank provision in Cleethorpes appears to have had a very positive impact on usage of the High Street rank, although an increase was also observed in usage of the other nearby night rank there, suggesting the improvement may not have been the only change leading to the level of increase.

The most important rank to drivers and passengers alike is the Grimsby station rank. There is evidence that even more vehicles are servicing that location now than in 2016, particularly in the daytime. Even though night demand appears to have increased this appears to have arisen from a more active vehicle fleet at that time rather than from more vehicles responding to the revised demand.

Usage of the local hackney carriage fleet by those needing WAV style vehicles remains at a good level, with some increased level from 2016. The current list of those providing a WAV service and its improved sharing has been welcomed by those needing this service.

The level of national observed growth at the station rank between the two surveys, as far as is possible to match periods, was 8%. This compares to the 3% growth in passenger numbers leaving using hackney carriages. Using the latest passenger information suggests that some 4,568 passengers would leave Grimsby Town station in a typical week. Given the observed rank demand is 4,886 passengers, this confirms that this rank services more than just railway demand.

People continue to appreciate the service provided by both private hire and hackney carriage in the area. Good service has been rewarded by more usage, and the bringing in of apps on the private hire side, and other marketing on the hackney carriage side, has benefitted the trade.

There remains a difference between Grimsby and Cleethorpes with higher hackney carriage usage in the former but more night activity (and more hackney carriage based) in the latter.

The licensed vehicle industry continues to support the limit policy strongly across the board.

Overall, before the onset of the COVID-19 pandemic, the situation for hackney carriage and rank-based demand in the NEL licensing area seemed very positive.

The lack of most key stakeholder information is very unlikely to reduce the robustness of this report as the overwhelming picture is that there is no unmet demand that is significant, and in fact, limitation on vehicle numbers appears to be providing both trade and public benefit. Even if the bulk of key stakeholders expressed concern at the lack of hackney carriage availability, which is very unlikely, this would only add a note of caution to our conclusions but would definitely not reverse them.

Conclusions

The current policy limiting hackney carriage vehicle numbers appears to provide good stability to the whole trade and is well-supported. There is very clear evidence of public benefit arising from this, and other present policies. Good levels of WAV exist, are active, and are used and accessible to the public.

COVID-19 issues

Since the completion of data collection for this study, the COVID-19 pandemic has led to a complete lockdown of the economy. However, the demand for key worker travel has remained throughout. Reduced public transport may have increased demand for licensed vehicle services. NHS requirements may have increased, although many might be booked rather than rank-based.

Many rank-based demand generators are closed and even when reopen are likely to see reduced levels of usage for some while, particularly the night economy. Business demand is likely to remain strongly suppressed and may never recover to its original level. Commuter demand may return to closer to normal levels although is also likely to be reduced. Shopping demand is less likely to suffer future reduced levels, although there may be some as people choose not to return to personal shopping.

Some people in the short to medium term, and perhaps even longer term, may choose to travel by licensed vehicle rather than public transport particularly if licensed vehicles act to increase and promote their safety levels. With a high proportion of WAV style vehicles many of which are already compartmented, this element could be a huge positive for the trade.

On the supply side there may be drivers who decide for various reasons not to continue in the licensed vehicle trade. However, the limit may reduce this level given the extra value in the plates implied. Historically, high unemployment levels (which may be produced down the line by COVID-19 impacts) generate new entrants to the licensed vehicle trade. This has always implied issues with need for training and experience for new entrants.

App-based services appear to have been hit hard by the impact given they rely on vehicle proximity to demand which has been suppressed overall. These services may need to re-invent themselves from various angles as the situation moves forward.

It is therefore uncertain what the overall impact of COVID-19 will be. Even by the time the next survey is due impacts may not be fully clear.

However, taking the present survey, we estimate that 67% of the observed rank demand would be night economy related, 25% shopping related, 7% commuter related and 1% business related. Assumptions could be applied to these moving forward to understand the likely rank-based demand.

This survey provides estimates of other licensed vehicle demand through both the on street and driver surveys. These proportions could be used to factor the rank-based estimates up to a total level of licensed vehicle demand, some of which could be calibrated to private hire booking office records at a general level. This could allow a demand model to be developed going forward that could help inform future policies that might be needed to ensure overall adequate matches between supply and demand across the licensed vehicle industry. It would certainly assist the licensing function in ensuring it understood in advance, and could therefore react ahead of the game rather than afterwards to needs for revised policies, such as on new entrants or on revised operating specifications taking account of the 'new normal'. This would be preferable to ante-post reaction that can often be much blunter in terms of positive impacts.

9 Recommendations

On the basis of the evidence gathered in this unmet demand survey for North East Lincolnshire, our key conclusion is that there is no evidence of any unmet demand for the services of hackney carriages either patent or latent which is significant at this point in time in the NEL licensing area. Given the strong counter evidence of public benefit and trade stability, the limit should continue to be retained, and can be retained at the present level.

Maintenance of the WAV vehicle list is providing significant accessibility benefits and must remain a priority.

The need for refreshing markings at all ranks that see any level of usage must be taken forward. Ranks not needed by trade nor frequented by passengers should at the same time be removed, possibly shifting some spaces to other smaller sites alongside their remarking.

Plans should be put in place to review the demand survey database of information with fresh rank observations undertaken preferably no later than November 2022, or perhaps at latest during March 2023.

The licensing section should be encouraged to share the detail of this Report with those in the policy section of the Council and seek closer liaison in the future in terms of inputs to the next revision of the LTP.

It would be worth putting in place options to consider potential needs to react ahead in providing the best possible policy background for licensed vehicle operations in the 'new normal'.

Appendix 1 – Industry statistics

DfT data states limit began in 1996

	hcv	phv	lv total	hcd	phd	dd	total driv		Ops	% hcv WAV	% phv WAV
1994D	121			168			168	**1994D**			
1997D	121	450	571	200	600		800	**1997D**		4	
1999D	121	468	589	150	503		653	**1999D**	31	4	
2001D	121	450	571	145	495		640	**2001D**	35	6	
2004D	121	500	621	121	500		621	**2004D**	37	0.01	
2005D	121	525	646	150	525		675	**2005D**	42	6	
2007D	172	552	724	207	425		632	**2007D**	34	31	
2009D	236	530	766	268	551		819	**2009D**	36	37	
2010N	235	396	631	*253*	*498*	_	*751*	**2010N**	*38*	40	
2011D	235	405	640	238	444		682	**2011D**	39	36	0.01
2012N	235	394	629	*234*	*433*	_	667	**2012C**	*41*	43	
2013D	213	390	603	229	422	27	678	**2013D**	42	47	
2014N	214	379	593	*233*	*395*	*14*	641	**2014N**	*41*	46	
2015D	226	338	564	236	368	*0*	604	**2015D**	37	40	
2016C	226	329	555	236	341	_	577	**2016C**	32	40	
2017D	230	329	559	233	353	_	586	**2017D**	33	26	
2018D	230	329	559	237	358		595	**2018D**	39	28	
2019D	230	317	547	234	340		574	**2019D**	43	33	
2020C	230	324	554	235	355		590	**2020C**	43	33	

Appendix 2 – List of ranks

Hackney Carriage Ranks – Backed by Traffic Regulation Order

List from 2016 report but modified by 2020 google streetview review and inception and revised to present by area and level of usage

Road	Location (approx.)	Comment	Restriction	Spaces
Grimsby				
Station Approach Road	Opposite Wetherspoons PH	Main rank	NWAATET	6
Victoria Street:				
Victoria Street West	Outside 'Istanbul'	Rank used	NSAATET	5
Victoria Street South	Between Pasture Street & Frederick Ward Way	Feeder to above	NSAATET	12
Garibaldi Street	Opposite covered Market	Serves market Signed but feint lines SV 18	NWAATET	10
Bethlehem Street	East of 'Petits'	Refreshed 2016 Now known as Abbeygate	NSAATET	4
South St. Mary's Gate	Rear of 'The Friary' PH	Refreshed 2016	NSAATET	4
Osborne Street	Outside Zimmini	Refreshed 2016	NSAATET	4
Riverhead	Opposite Multi-Storey car park	Tried but lost with road revisions	NWAATET	4
Other locations within Grimsby area: (all no longer used or not marked)				
Kingsley Grove	Outside former Ante Natal Clinic	Unused Still there SV Jun 16	NWAATET	2
Thames Court	North of Wingate Road (Great Coates)	Unused Not found 2020	NWAATET	2

Cleethorpes				
Sea Road ranks:				
	South-west of North Promenade	In Aug 18 SV sign is there (twice), but road marking is Bus Stop	NWAATET	5
	North-east of Alexandra Road	Aug 18 SV clearly signed and marked	No waiting 11pm-7am except taxis	5
	Outside 'Bucket and Spade' PH	Aug 18 SV clearly signed and marked	No waiting 11pm-7am except taxis	5
High Street ranks				
	West of Osborne Street		No waiting 11pm-7am except taxis	4
	Outside Wetherspoons	New, 2019	18:00 to 06:00 Otherwise loading bay	4
Cleethorpes Station Rank:				
Grant Street	South-east of Station Road	Near station	NWAATET	2
Station Road	North-west of Grant Street	Feeds above	NWAATET	8
Other Cleethorpes ranks:				
Market Street	East of Osborne Street	Aug 18 SV signed only	No waiting 11pm-7am except taxis	2
Market Street	West of Osborne Street	Aug 18 SV signed only	No waiting 11pm-7am except taxis	5
St Peter's Avenue	Outside Boots	Aug 18 SV signed and lined but poor	No formal restriction confirmed	?2
Grimsby Road	Outside Macdonald's	Unused Aug 18 SV signed and lined but poor	NWAATET	4

Grimsby Road		East of Park Street	Unused, Aug 18 SV near Tower Pizza signed and lined	No waiting 6pm-6am except taxis	4
Sea View Street		Outside 'The Point'	Unused, markings now poor, private hire office nearby	No waiting 11pm-7am except taxis	2
Other places within North East Lincolnshire					
Humberston	North Sea Lane	Opposite Trawlerman PH	Aug 18 SV signed but lines very feint	NWAATET	4
Immingham			Rank now gone		
KEY:					
NWAATET		No waiting at any time except taxis			
NSAATET		No stopping at any time except taxis			

Appendix 3 – Timetable of rank observations

Please see separate document

Appendix 4 – Detailed rank observation results

Please see separate document

Appendix 5 – Detailed on street interview results

Please see separate document

Appendix 6 List of Stakeholders consulted

Key consultee	Response
NOTE: Not possible to collect due to impact of Covid-19	
Supermarkets	
Hotels	
Restaurants / Cafes	
Entertainment	
Public Houses	
Night Clubs	
Other key stakeholder groups	

Rail year (ends March in last year noted)	Entries / exits	Growth / decline
Grimsby Town (948th) (Trans Pennine Express)		
1997 / 1998	330,316	n/a
1998 / 1999	335,720	+2%
1999 / 2000	373,011	+11%
2000 / 2001	362,451	-3%
2001 / 2002	384,413	+6%
2002 / 2003	380,874	-1%
2003 / 2004	Not collected	
2004 / 2005	385,532	+1%
2005 / 2006	380,732	-1%
2006 / 2007	403,284	+6%
2007 /2008	404,048	+0.2%
2008 / 2009	411,860	+2%
2009 / 2010	391,982	-5%
2010 / 2011	416,870	+6%
2011 / 2012	448,080	+7%
2012 / 2013	438,522	-2%
2013 / 2014	427,367	-3%
2014 / 2015	451,658	+6%
2015 / 2016	422,136	-7%
2016 / 2017	438,050	+4%
2017 / 2018	454,166	+4%
2018 / 2019	456,768	+1%
Growth since last survey (2015/6 to 2018/9) (and from 97/98)		+8% (+38%)

Rail year (ends March in last year noted)	Entries / exits	Growth / decline
Cleethorpes (1,192nd) (Trans Pennine Express)		
1997 / 1998	160,217	n/a
1998 / 1999	166,848	+4%
1999 / 2000	192,468	+15%
2000 / 2001	193,441	+1%
2001 / 2002	202,734	+5%
2002 / 2003	179,086	-12%
2003 / 2004	Not collected	
2004 / 2005	208,039	+16%
2005 / 2006	210,294	+1%
2006 / 2007	227,959	+8%
2007 /2008	240,910	+6%
2008 / 2009	235,626	-2%
2009 / 2010	204,850	-13%
2010 / 2011	245,100	+20%
2011 / 2012	264,686	+8%
2012 / 2013	239,802	-9%
2013 / 2014	277,724	+16%
2014 / 2015	269,992	-3%
2015 / 2016	259,844	-4%
2016 / 2017	288,094	+11%
2017 / 2018	285,412	-1%
2018 / 2019	296,002	+4%
Growth since last survey (2015/6 to 2018/9) (and from 97/98)		+14% (+85%)

Rail year (ends March in last year noted)	Entries / exits	Growth / decline
Habrough (2,070th) (Northern)		
1997 / 1998	32,230	n/a
1998 / 1999	28,919	-10%
1999 / 2000	29,727	+3%
2000 / 2001	28,437	-4%
2001 / 2002	31,336	+10%
2002 / 2003	30,954	-1%
2003 / 2004	Not collected	
2004 / 2005	25,305	-18%
2005 / 2006	27,749	+10%
2006 / 2007	29,791	+7%
2007 /2008	28,054	-6%
2008 / 2009	27,640	-1%
2009 / 2010	25,632	-7%
2010 / 2011	29,922	+17%
2011 / 2012	33,252	+11%
2012 / 2013	32,222	-3%
2013 / 2014	30,710	-5%
2014 / 2015	31,882	+4%
2015 / 2016	30,098	-6%
2016 / 2017	33,724	+12%
2017 / 2018	33,412	-1%
2018 / 2019	39,172	+17%
Growth since last survey (2015/6 to 2018/9) (and from 97/98)		+30% (+22%)

Rail year (ends March in last year noted)	Entries / exits	Growth / decline
Great Coates (2,313th) (Northern)		
1997 / 1998	9,506	n/a
1998 / 1999	9,203	-3%
1999 / 2000	10,449	+14%
2000 / 2001	8,804	-16%
2001 / 2002	9,277	+5%
2002 / 2003	8,862	-4%
2003 / 2004	Not collected	
2004 / 2005	8,963	+1%
2005 / 2006	9,141	+2%
2006 / 2007	8,747	-4%
2007 /2008	9,002	+3%
2008 / 2009	9,534	+6%
2009 / 2010	8,110	-15%
2010 / 2011	8,468	+4%
2011 / 2012	9,038	+7%
2012 / 2013	9,370	+4%
2013 / 2014	10,652	+14%
2014 / 2015	11,540	+8%
2015 / 2016	9,390	-19%
2016 / 2017	10,354	+10%
2017 / 2018	11,144	+8%
2018 / 2019	11,042	-1%
Growth since last survey (2015/6 to 2018/9) (and from 97/98)		+18% (+16%)

Rail year (ends March in last year noted)	Entries / exits	Growth / decline
Stallingborough (2,328th) (Northern)		
1997 / 1998	9798	n/a
1998 / 1999	10157	+4%
1999 / 2000	8736	-14%
2000 / 2001	8187	-6%
2001 / 2002	8358	+2%
2002 / 2003	7425	-11%
2003 / 2004	Not collected	
2004 / 2005	8074	+9%
2005 / 2006	8614	+7%
2006 / 2007	8709	+1%
2007 /2008	9397	+8%
2008 / 2009	9054	-4%
2009 / 2010	9626	+6%
2010 / 2011	9784	+2%
2011 / 2012	11104	+13%
2012 / 2013	11358	+2%
2013 / 2014	12434	+9%
2014 / 2015	13048	+5%
2015 / 2016	10588	-19%
2016 / 2017	10602	+0.1%
2017 / 2018	10112	-5%
2018 / 2019	9460	-6%
Growth since last survey (2015/6 to 2018/9) (and from 97/98)		-11% (-3%)

Rail year (ends March in last year noted)	Entries / exits	Growth / decline
Healing (2,342nd) (Northern)		
1997 / 1998	9,389	n/a
1998 / 1999	9,936	+6%
1999 / 2000	11,238	+13%
2000 / 2001	9,931	-12%
2001 / 2002	10,084	+2%
2002 / 2003	8,124	-19%
2003 / 2004	Not collected	
2004 / 2005	8,492	+5%
2005 / 2006	10,655	+25%
2006 / 2007	8,473	-20%
2007 /2008	8,579	+1%
2008 / 2009	8,096	-6%
2009 / 2010	8,562	+6%
2010 / 2011	10,204	+19%
2011 / 2012	11,454	+12%
2012 / 2013	11,604	+1%
2013 / 2014	12,260	+6%
2014 / 2015	13,036	+6%
2015 / 2016	10,626	-18%
2016 / 2017	9,822	-8%
2017 / 2018	8,820	-10%
2018 / 2019	8,490	-4%
Growth since last survey (2015/6 to 2018/9) (and from 97/98)		-20% (-10%)

Rail year (ends March in last year noted)	Entries / exits	Growth / decline
Grimsby Docks (2,407th) (Northern)		
1997 / 1998	4,608	n/a
1998 / 1999	5,052	+10%
1999 / 2000	4,521	-11%
2000 / 2001	4,829	+7%
2001 / 2002	4,701	-3%
2002 / 2003	4,805	+2%
2003 / 2004	Not collected	
2004 / 2005	6,838	+42%
2005 / 2006	4,777	-30%
2006 / 2007	5,458	+14%
2007 /2008	5,873	+8%
2008 / 2009	5,568	-5%
2009 / 2010	3,792	-32%
2010 / 2011	3,998	+5%
2011 / 2012	4,068	+2%
2012 / 2013	3,994	-2%
2013 / 2014	4,662	+17%
2014 / 2015	4,932	+6%
2015 / 2016	4,060	-18%
2016 / 2017	4,574	+13%
2017 / 2018	4,502	-2%
2018 / 2019	4,830	+7%
Growth since last survey (2015/6 to 2018/9) (and from 97/98)		+19% (+5%)

Rail year (ends March in last year noted)	Entries / exits	Growth / decline
New Clee (2,472nd) (Northern)		
1997 / 1998	337	n/a
1998 / 1999	308	-9%
1999 / 2000	252	-18%
2000 / 2001	303	+20%
2001 / 2002	349	+15%
2002 / 2003	458	+31%
2003 / 2004	Not collected	
2004 / 2005	332	-28%
2005 / 2006	246	-26%
2006 / 2007	336	+37%
2007 /2008	455	+35%
2008 / 2009	526	+16%
2009 / 2010	322	-39%
2010 / 2011	298	-7%
2011 / 2012	334	+12%
2012 / 2013	290	-13%
2013 / 2014	348	+20%
2014 / 2015	524	+51%
2015 / 2016	458	-13%
2016 / 2017	1286	+181%
2017 / 2018	1236	-4%
2018 / 2019	1720	+39%
Growth since last survey (2015/6 to 2018/9) (and from 97/98)		+276% (+410%)

North East Lincolnshire Council
Unmet demand survey

Ian Millership

Licensing and Community Protection Committee
North East Lincolnshire Council
Wednesday 9th September 2020

Aim of this survey

- Identify any significant unmet demand (or otherwise)

- Provide committee evidence of current position regarding unmet demand and its significance at this point in time

- N.B. All evidence collected in advance of the impacts of the Coronavirus pandemic apart from key stakeholder consultation which was not practicable.

Study timetable

- Undertaken November 2019 to mid March 2020
- Rank observations mid-February 2020
- On street interviews February 2020
- All driver survey mid-Feb to mid-March 2020
- Small number of key stakeholders consulted
- Study had been delayed awaiting completion of rank revisions in Cleethorpes

Fleet / Industry issues

- 230 hackney carriages
- No limit 2005 to 2009 (fleet up 97%)
- Set at 220 in 2012
- Generally reducing level of phv since 2007
- Local transport policy supports licensed vehicles as important complement within overall transport mix
- After 2012 focus on increasing levels of WAV in hcv fleet
- Level had fallen to low of 26% at time of last study
- However since then has risen back to 33% of fleet
- Ahead of similar English value for mixed fleets of 23% WAV

Rank activity

- 211 hours observed mid February
- 8,430 passengers in a typical week across all ranks in area
- 18% up on 2016 even though in mid-Feb (2016 mid-Nov)
- Grimsby Station still busiest rank at 58% of all passengers
- Also saw 3% growth since 2016
- Main growth High St Cleethorpes – now 2nd rank, 21% of pass
- Market St Cleethorpes 3rd busiest, 10%
- Victoria St, Grimsby halved its patronage
- Freeman St market relatively similar
- St Peters Avenue, Freeman St Market and Cleethorpes Station ranks all see car abuse (all poorly marked)
- Always activity at some rank somewhere during rank observation period

Public consultation

- 40% had used licensed vehicle (lv) in area in last 3 months
- 43% Grimsby (G), 30% Cleethorpes (C)
- 37% across area never used lv
- 1.7 trips per person per month G, 0.5 C
- Estimated 72% of lv trips by hcv, G, 27% C
- 32% could not remember when last used hcv in G, 63% C
- 37% across area said got lv from ranks (38% G, 34% C)
- 3% used apps, all in Grimsby
- App and other promotions increased usage of two of top 3 companies (one promotion hcv based)
- Very few had not seen (appreciated) hcv in area (3%, 1% G, 9% C)
- Well appreciated fleet

LVSA

Stakeholder consultation

- COVID-19 meant no real response available
- Not a major issue as overwhelming picture is lack of any unme demand of significance
- Even strong views from key stakeholders would not overturn the conclusions

Trade consultation

- 6% response (half of that in 2016)
- 45% response from those driving hcv
- Similar responses to 2016
- 18% said hours working affected by avoiding disruptive passengers
- 2 mixed hcv/phv co and one pure phv co accounted for 66% of driver quoted pre-booking platforms used
- About half of hcv respondents independent
- 94% supported limit, 97% felt there were enough hcv
- 29% opposed revised license plate siting, 29% supported and 24% felt current system was acceptable
- 71% felt fares about right, 23% wanted increase

Disability

- 12 at Grimsby Station and 2 at Freeman St accessed hcv in wheel chairs
- Up from 10 in 2016.
- Further 64 visibly disabled and assisted
- Comment from disability representative that relevant and up to date contact details for WAV had significant impact on access
- Public responses suggests potential higher need for WAV than in other places, focussed on WAV not other styles

Unmet demand evaluation

- Flow profile is peaky, in midnight hour
- Current Saturday demand met with about a third of fleet
- Index of significance of unmet demand (ISUD) increased from last time (3.5 compared to 1.92)
- Still long way from significance (80)
- Average passenger delay (APD) and off peak proportion with delay both reduced
- Latent demand increased, seasonality set to 1.2, higher proportion of passengers in hours with APD a minute or more
- Consistent with increased demand

LVSA

Key conclusions

- No evidence of any unmet demand that is significant
- Covers both latent and patent demand
- Current limit policy provides public benefit
- Provides stability to trade and strongly supported by trade (phv and hvc)
- Should therefore be retained
- Rank revisions generally benefit trade
- Grimsby station rank even more important to trade now
- Growth in national passenger numbers 8% similar to 3% growth in hcv passengers there
- Station rank services more than just rail demand
- Increased Cleethorpes night demand from more active vehicles rather than more vehicles being active

Final key comments

- Current maintenance of WAV vehicle list and its publicity provides significant accessibility benefits
- Maintenance of list must remain a priority
- Positive benefit of keeping rank markings current and clear
- Remaining used ranks that are poorly marked need urgent action including re-marking and marketing
- Redundant ranks need to be relinquished and removed
- Fresh rank observations needed preferably November 2022 or at latest by March 2023
- Report to be shared with transport policy
- Review impact of pandemic

Thank You.

Any Questions?