Crawley Borough Council
Unmet demand survey 2022

January 2023

Executive Summary

This Unmet demand survey 2022 has been undertaken on behalf of Crawley Borough Council following the guidance of the April 2010 Department for Transport (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 current review finds a generally healthy hackney carriage operation in the area, with a very strong focus on servicing Three Bridges Railway Station. Haslett Avenue West has seen growth in usage since 2017 but all other central area ranks have declined. There is need for consideration of how night demand can be increased and better serviced, with one element being enforcement against private cars using night ranks (admittedly not in the gift of either licensing or even the authority itself), and thought being given by the trade to how they might once again increase levels of service to the public to the benefit of the night life of the area.

Contents

1 General introduction and background

1.1 Licensed Vehicle Surveys and Assessment (LVSA) is a joint venture between CTS Traffic and Transportation Ltd (CTS) and Vector Transport Consultancy. These two companies have hitherto been the two leading practitioners of hackney carriage unmet demand surveys in recent years who joined forces in early 2017. The combined experience of this joint venture covers more than 245 similar studies undertaken since 1999. The contracting company for this survey, CTS, also undertook the previous two surveys for Crawley (with our associated company undertaking the survey previous to that) and therefore has unrivalled knowledge of the operation of licensed vehicles in the area.

1.2 Crawley Borough 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 in the form of a limit in the number of vehicle licences issued 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.

1.3 This review of current policy is based on the Best Practice Guidance produced by the Department for Transport in April 2010. 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".

1.4 Current hackney carriage, private hire and operator licensing is undertaken within the legal frameworks first set by the Town Polices Clause Act 1847. This has been 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. Many of the aspects of these laws have been tested and refined by other more recent legislation and more importantly through case law.

1.5 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 vehicles' to refer to both hackney carriage and private hire.

1.6 The legislation around licensed vehicles and drivers has been the subject of many attempts at review. The limiting of hackney carriage vehicle numbers has been a particular concern as it is often considered to be a restrictive practice and against natural economic trends. The five most recent reviews were by the Office of Fair Trading in 2003, through the production of the Best Practice Guidance in 2010, the Law Commission review which published its results in 2014, the All-Party Parliamentary Group on Taxis deliberations in 2018 (resulting in the publication of part revisions of the Best Practice Guidance) and the recently concluded consultation on review of the remainder of the Best Practice Guidance. None of these resulted in any material change to the legislation involved in licensing.

1.7 In November 2016, the Department of Transport (DfT) undertook a consultation regarding enacting Sections 167 and 165 of the Equality Act 2010. These allowed 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

1.8 This was enacted from April 2017 but continued issues led to pressure for further change (some of which came in the second of two 2022 Acts). These two new 2022 Acts make small but significant changes. The 2022 Acts are the "Taxis and Private Hire Vehicles (Safeguarding and Road Safety Act) (31 March 2022)" and the "Taxis and Private Hire Vehicles (Disabled Persons) (28 June 2022)".

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

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

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

1.12 The upshot of all these reviews in respect of the principal subject of this survey is that local authorities retain the right to restrict the number of hackney carriage vehicle licences.

1.13 The Law Commission conclusion (Law Commission, Taxi and Private Hire Services, Law Com No 347, May 2014, ref CM8864) 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 interval encouraged for review of unmet demand levels also be used for rank reviews and accessibility reviews. However, there is currently no expected date either for publication of the Government response to the Law Commission, nor indeed any plans for further revisions to legislation. It should be noted that DfT did encourage authorities during the pandemic to delay unmet demand reviews beyond that three-year interval as they did not consider any review in the midst of the pandemic as being sufficiently typical to be of value. This was the view taken by Crawley Borough Council, hence the delay in the review and commissioning of a survey.

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

1.15 The date for publication of the new DfT Best Practice Guidance remains ‘imminent’ but unknown, nor is the level of actual change that will occur fully known.

1.16 A more recent restriction, often applied by Councils 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 and/or that the vehicle must meet other specifications such as being hybrid or electric powered. 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. This can also occur in areas with quantity controls and is indeed the case at Crawley Borough Council where a mixed fleet of vehicles is in evidence, with Wheelchair Accessible Vehicle requirements on a proportion of the hackney carriage vehicles.

1.17 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 to those not prepared to make such a financial investment.

1.18 Some are now considering if similar changes might be made to encourage greater introduction of a more sustainable vehicle fleet, particularly in light of the suggestion in the Best Practice Guidance revision (Issued March 2022) consultation that alternatives to limiting numbers should be applied if they were felt to achieve the same aims. However, it is concerning that none of the alternatives include any requirement to prove that the policy chosen to replace any restriction on vehicle numbers as a quantity control has actually achieved its aims.

Unmet Demand Studies

1.19 After introduction of the Transport Act 1985, Leeds University Institute for Transport Studies developed a tool by which unmet demand could be evaluated and a determination made and 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.

1.20 Some revisions have been made following the few but specific court cases where various parties have challenged the policy of retaining a limit. (see further details in paras 1.24 and 1.25 below)

1.21 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 in the case of England and Wales.

1.22 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 on 5 April 2012 in Scotland).

1.23 The Best Practice Guidance 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 2010 Best Practice Guidance is that "an interval of three years is commonly regarded as the maximum reasonable period between surveys". The 2010 Best Practice Guidance 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".

Unmet Demand Case History

1.24 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.

1.25 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).

1.26 In general, industry standards suggest that the determination of conclusions about significance of unmet demand must take into account the practicability of improving the standard of service through the increase of supply of vehicles. It is also important to have consistent treatment of authorities as well as for the same authority over time, although apart from the general guidance of the Best Practice Guidance there is no clear stipulations as to what this means in reality

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

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

1.29 To summarise, the Department for Transport Best Practice Guidance only references 'quantity restrictions' and that not imposing them is regarded by the Department as 'best practice'. Further discussion of this is provided in Chapter 8 below including details of the numbers of authorities that retain such quantity restriction.

Conclusion to Chapter

1.30 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.

1.31 These are split between hackney carriages which are alone able to wait at ranks or pick up people in the streets normally 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 and any licence is invalidated.

1.32 For Crawley, the standard split between hackney carriage and private hire drivers remains, with neither driver being able to drive the alternative kind of vehicle unless they hold the relevant licences, permissions and insurances to do so. This means that any driver wishing to drive both hackney carriage and private hire needs to have two separate driver licences. They are then able to drive any vehicle that the owner permits them to drive.

1.33 However, in the minds of the travelling public the view of what a taxi is tends to be much more blurred than the formal definitions. The invention of the mobile phone and then the internet have not helped with definitions although this has been going on a long time but with many significant developments in the period of two or so years prior to the pandemic with the take-up of apps both for private hire and hackney carriage vehicle services.

1.34 The 'triple lock' licensing rule has also become accepted. A vehicle, driver and operator must all be licensed under the same licensing authority to provide full protection to the passenger and to comply with the legislative requirements.

1.35 However, it is also accepted that a customer can call any private hire company from any location they so choose 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 in, although attempts are being made to minimise this issue with growing liaison between licensing authorities.

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

1.37 This continues to be debated with the key issue being if obtaining a vehicle using an app (most of which rely on proximity to choose a vehicle) is a pre-booking or not, given the often minimal time between the person making known their need on the app and a vehicle meeting that need. There are many threads to this element, with the latest involving Sefton Council and Uber with quoting of the full amount of detail and cases not appropriate until a final answer is eventually provided – almost certainly not in the new Best Practice Guidance however.

1.38 There is also strong current pressure on licensing authorities to work with the environmental sections of their authorities in order to assist in the reduction of vehicle emission issues within Government guidelines. It is noted that this is already in process at Crawley Borough Council.

Coronavirus

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

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

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

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

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

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

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

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

1.47 At the time of the rank surveys collected for this report (early September2022) there was a high level of COVID infection but the link between infection and serious illness appeared to have been broken, although the need to keep levels of immunity to severe disease may well lead to further immunisation as time proceeds. Another booster injection was starting to be rolled out as part of the vaccination strategy.

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

1.49 Various contract work appears to have remained a constant during the pandemic however (school transport, health transport and so on). However, airports were particularly badly hit, and for Crawley (particularly private hire) this meant a significant drop in demand with Gatwick Airport (within the authority boundary) closing its South Terminal from 15th June 2020 until 27th March 2022 entirely. (BBC News article dated 27th March 2022)

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

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

1.52 Further, the impacts of the developing war in Ukraine and other economic changes partly arising from Brexit is again putting pressure on costs of providing licensed vehicle services. Rising fuel prices have also added to the issues, albeit counter balanced with an increase in fare charges for Crawley.

1.53 The days when the main aim of a demand survey was checking if passenger demand had changed to see if supply remained sufficient have now been replaced by a much wider research need to identify both demand and supply side changes (such as drivers working shorter weeks, more time by drivers undertaking contracts or diversifying as delivery driverschanged passenger use of ranks and locations arising from matters such as reduced rail travel, etc). Even long-standing areas with limited hackney carriage vehicle numbers have been impacted by having spare hackney carriage vehicle licences available for the first time in decades, although this is not the case in Crawley.

Local Licensing Policy

1.54 The local Private Hire and Hackney Carriage Licensing Policy document of December 2021 was consulted on up to mid-January 2022 and adopted on 1st April 2022. This refreshed document took on board the latest Department for Transport Guidance Statutory Standards July 2020 as part of the wider review of the Policy document.

1.55 Paragraph 2.1 of the local Crawley Policy document refers to the limitation policy as approved last on 12th June 2017 following the previous survey results. It also states 'this Policy will generally be reviewed every three years, and in line with guidance, an Unmet Demand Survey will be conducted as part of that review to ascertain whether this Policy remains in force.'

1.56 There is a further policy for Crawley that new hackney carriages beyond the current fleet would only be granted for wheelchair accessible vehicles. Alongside this, plates 1-73 are exempt from this policy as long each of those licences continue to be renewed and do not lapse.

1.57 Paragraph 2.3.3 of the Crawley Policy document makes it clear that purpose-built vehicles are amongst those the Council will generally licence only as hackney carriages. This is to ensure that the two types of licensed vehicle can be easily distinguished by the traveling public and to avoid confusion.

1.58 The current Policy distinguishes hackney carriages by ensuring they are all white painted vehicles, with white and blue rear and internal plates and large roof signs (76 by 14 by 16 cm) clearly stating they are a "CRAWLEY TAXI". Built in roof lights may be acceptable. Permanent door signage also aids identification as a Crawley Borough Council licensed hackney carriage.

1.59 All wheelchair accessible vehicles will be looked at in accordance with the Policy and can be both side and rear loading.

1.60 Private hire can only be painted any dark colour, with yellow rear / internal plates and a small yellow non-illuminated roof sign (46 by 16 by 14 cm) clearly stating 'ADVANCE BOOKINGS ONLY' with the company name beneath this, the rear of the sign must say 'CRAWLEY' only. This sign **must not** include the words hire, cab, taxi, hackney or any other word that might lead someone to believe the vehicle is a hackney carriage, even if those words are part of the company name. Private hire door signs are on the lower front panels of each front door stating 'ADVANCE BOOKING ONLY' with a Private Hire Operator company name then a phone number.

1.61 There is no guidance provided within the Policy documents in regard to booking offices (a normal national situation) but this is included as part of Private Hire Operator Licence Conditions.

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2 Local background and context

2.1 Key dates for this for Crawley Borough Council are:

- CTS Traffic and Transportation appointed on 1st July 2022
- as confirmed during the inception meeting for the survey held on 21st July 2022
- Survey was carried out between August and December 2022
- Pedestrian street survey work occurred in November and December 2022
- Video rank observations occurred in early September 2022
- Vehicle driver opinions and operating practices were canvassed using an all-driver survey issued by the council and available for completion during October and November 2022 (online and manual completion of survey offered as options)
- A WAV user questionnaire was available during November 2022 promoted by the local authority
- Key stakeholders were consulted throughout the period of the survey

2.2 Crawley Borough Council has a current population of 118,500 for 2021 initial census values (compared to 114,998 using the latest estimates for 2021 from 2011 data, and 113,800 for the 2017 survey). This suggests although the area has seen growth in the last four years since the previous survey (albeit to 2021 not 2022) it is more than was originally expected.

2.3 Whilst Crawley Borough Council is the planning and licensing authority for its area, transport policy and Highway matters are the principal responsibility of West Sussex County Council.

2.4 In terms of background Council policy, West Sussex County Council are the authority that deals with overall transport policy and Highway matters. This means that rank provision is undertaken at County level along with traffic regulation and its enforcement undertaken on behalf of County by authorised officers of the Borough Council. As with other authorities the County ensures significant involvement of Crawley Council in such decisions and associated enforcement of such.

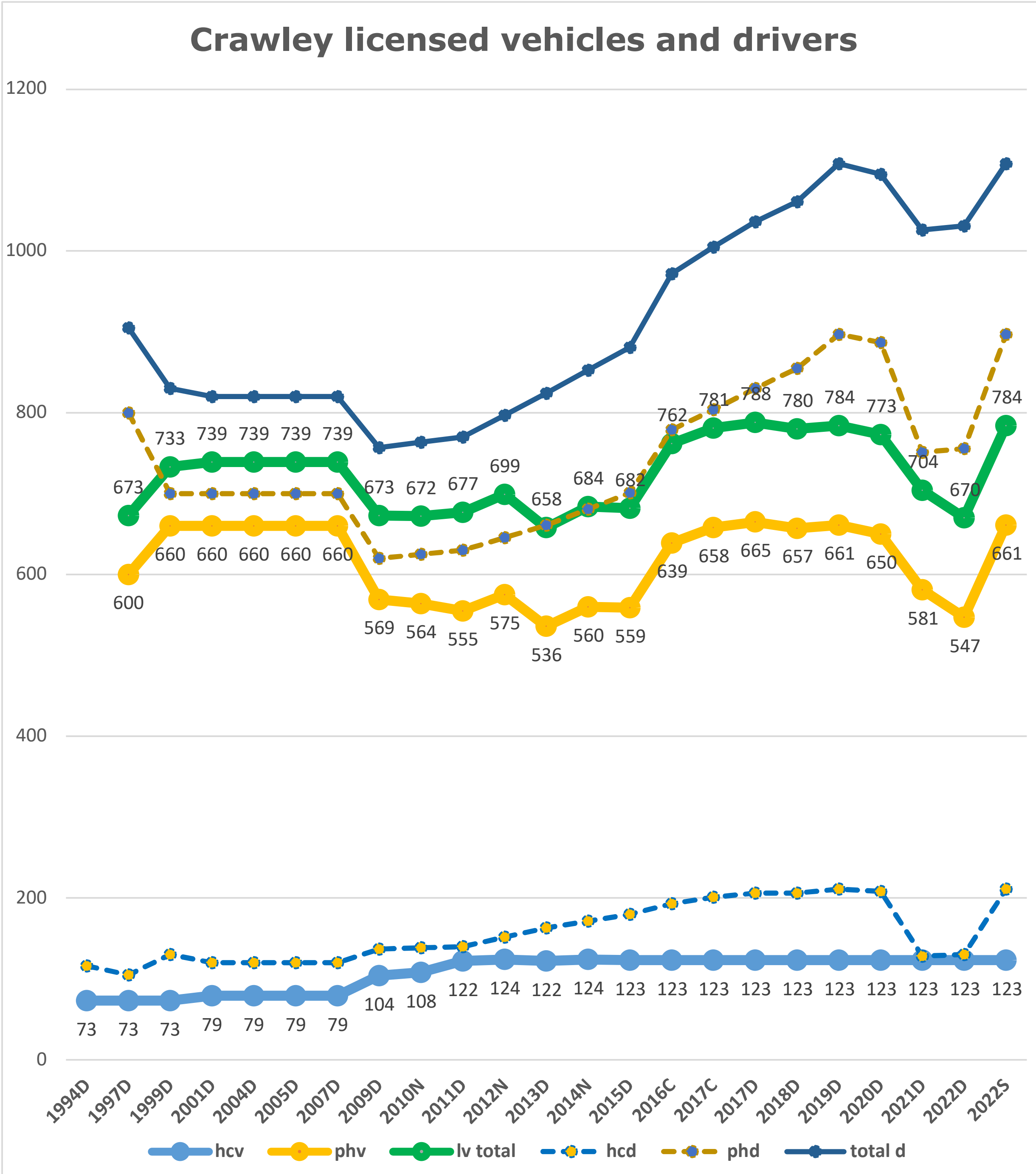
2.5 The current West Sussex Transport Plan (WSTP) was adopted on 1st April 2022 after consultation through 2021. It shows how the County intends to address key challenges by improving, maintaining and managing the transport network in the period up to 2036. Crawley Borough Council has its own transport strategy "New directions for Crawley" (March 2020). This sees a move from planning for vehicles to planning for people and places. The developing vision has to be forward-focussing towards a low-carbon, healthy and attractive town.

2.6 The overall vision seeks to increase activity by 2030 whilst focussing more growth on the town centre living accommodation reducing need to travel. Collaboration occurs with West Sussex and the Transport for the South East (TfSE) organisation. Furthermore, the Council has ambitious emissions and environmental targets having declared a climate emergency in recent years.

Focus on Licensing Matters

2.7 However, all licensing authorities have full powers over the licensing of the vehicles, drivers and operators serving people within their area. Crawley Borough Council has chosen to utilize its power to limit hackney carriage vehicle numbers. There was a period from 2007 to 2011 when hackney carriage vehicle numbers increased (from 79 to the present 123) following a decision to delimit, but the limit was returned in around 2011. The Council retains a mixed vehicle hackney carriage fleet with about 19% of its current fleet Wheelchair Accessible Vehicle (WAV) style (see further below).

2.8 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.



Key: hcv = hackney carriage vehicles; phv = private hire vehicles, lv total = licensed vehicle total (sum of hackney carriage and private hire vehicles) hcd = hackney carriage drivers; phd = private hire drivers; total d = total of all drivers (both hackney carriage and private hire).

Licensing Statistics from 1994 to date - vehicles

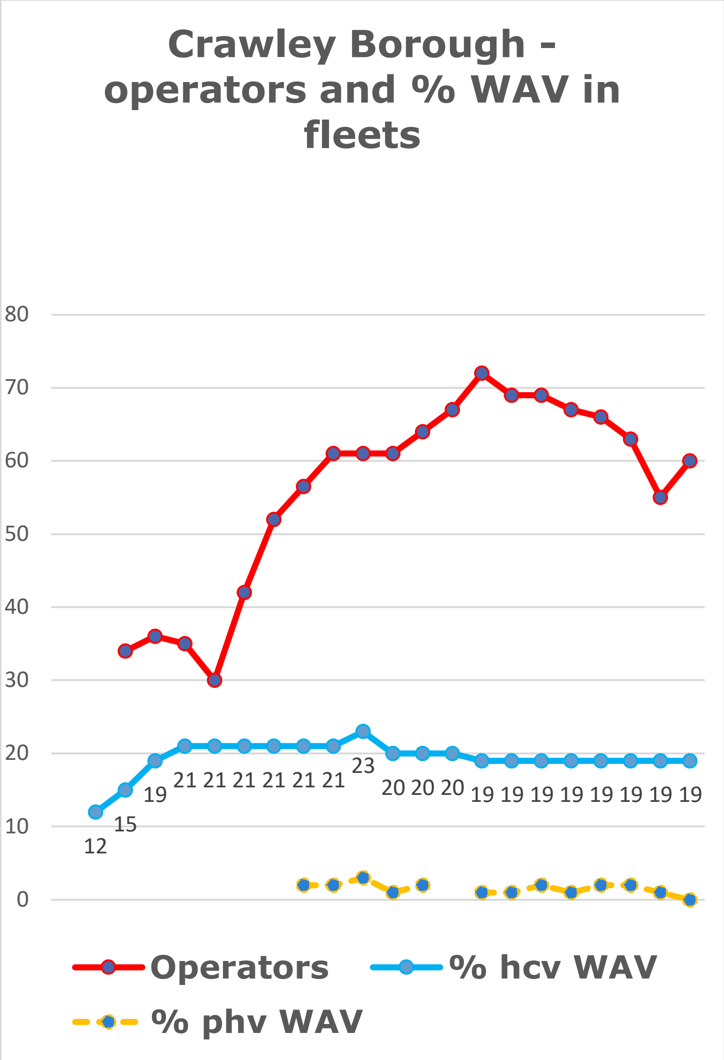
2.9 The first very clear statement from the graph above is the strong disparity between hackney carriage vehicles and their drivers and the private hire fleet and its drivers. From a limited number of from 73 to 79 up to 2007, a period with no limit (a period of delimitation) led to the current level and limit of 123 hackney carriage vehicles.

2.10 Over time, driver numbers grew for the hackney carriage fleet while vehicle numbers could not. In Crawley, several drivers act as "journeymen" and drive a hackney carriage vehicle owned by another hackney carriage proprietor partly because they were unable to obtain a licensed vehicle due to the limitation policy, or partly from their choice not wishing to bear the costs of owning a vehicle. The pandemic period saw a sharp drop in driver numbers for this fleet, but with multiple drivers using some vehicles as above.

2.11 On the private hire side, vehicle numbers had been growing strongly around the time of the previous survey. After this, their growth levelled off, with the pandemic seeing a strong dip in both vehicle and driver numbers, both of which have now increased again, almost returned to pre-pandemic levels. Interestingly the current level of private hire vehicles is very close to the number in place over several years from 1997 on before a previous slump of their numbers which resurged in advance of the pandemic.

2.12 The graphs demonstrate that the current number of hackney carriage vehicles has been 123 since 2015. Prior to that numbers quoted in the Department for Transport statistics were between 122 and 124 from 2012, having seen major growth from 79 to 104 to the current levels beginning in 2007. It should be noted that the Council did not accept new driver applications for the duration of the pandemic, re-introducing the process in January 2023, another factor that has influenced numbers.

2.13 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. This is not the case in Crawley, where WAVs, with certain provisions, across the fleet are encouraged.



Operator numbers and levels of WAV provision in the fleet

2.14 These figures show that private hire operator numbers have generally increased in the area over time, then declined since 2018 to a low in the latest Department for Transport numbers (survey dated end of March 2022) with some resurgence between March 2022 and the time of the commencement of this survey in September 2022. In fact, Crawley Borough Council has seen a significant increase in the number of Private Hire Operators in the last 12 months.

2.15 In terms of wheelchair accessible levels of vehicles, the current 19% remains very similar to the level first attained in 2001, although there was a high point of 23% in 2012 and the current level is marginally less than the typical level since 2001. Only a small number of wheelchair accessible vehicles exist in the private hire element of the trade with both now having been mostly withdrawn from the fleet, leaving those needing WAV almost entirely dependent on the hackney carriage fleet of the area.

2.16 Being aware of this, the Council is working to increase the level of private hire wheel chair accessible vehicles as part of its Equality Duty.

Limit Policy Review

2.17 Crawley Borough Council undertakes regular review of its policy to limit hackney carriage vehicle numbers in line with the Best Practice Guidance from the Department of Transport. The previous surveys were in 2017, 2014, 2011 and 2007. The gap from now to the previous survey arises because the date of the next after 2017 would have been in the peak of the pandemic when it would not have afforded a representative picture and therefore a decision was taken by the Council to delay the survey until matters settled.

2.18 For the record, the rank survey work in 2017 was undertaken in early March (not near Easter) whilst that for this survey was early September 2022. This should not make any significant difference to results but is worthy of note.

Local Area changes

2.19 We became aware that, although the main three clubs in the area had closed more recently, there is a good night-life in various parts of Crawley although principally focussed on the High Street Crawley area. Current clubs inluclude Aura (open Fridays and Saturdays 22:00 hours to 04:00 hours), Bar 7, Medusa and Octopus amongst others.

2.20 The Council confirmed that at least one national app company is now operating within Crawley.

3 Patent demand measurement (rank surveys)

3.1 As already recorded in Chapter 2, control of provision of on-street ranks in Crawley Borough Council is under control of West Sussex County Council, although the County involve the Borough in decisions regarding revision to provision and relining / remarking / signing of ranks with the Borough also carrying out enforcement activity on behalf of County.

3.2 Our methodology involves a current review both in advance of submitting our proposal to undertake this survey and at the study inception meeting, together with site visits, where considered necessary (none were felt necessary for this survey). 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 as separate Appendix 1.

3.3 Since the last survey, the night club "Moka" near Crawley railway station has closed and formal rank provision at Crawley Railway Station has been removed in favour of short-term drop-off parking, although a temporary rank during renovations has been provided. The main provision for licensed vehicles here remains, as always, with a private hire company who retain parking spaces for their vehicles and a booking office within the station. The national rail web site clearly states no taxis are available although its plan has not been updated to remove the taxi spaces that are no longer there. This needs to be addressed.

3.4 The expected major redevelopment of the rank at Three Bridges Railway Station had yet to begin at the time of our surveys.

Overview of rank operation

3.5 Our observations at or near ranks found a total of some 5,181 all-vehicle arrivals and departures (this includes private cars, goods vehicles, private hire vehicles and emergency vehicles that could affect operation of the rank). 68% of these were at Three Bridges Railway Station, 16% at the Boulevard, 9% at the High Street, opposite the Jubilee Oak Public House, and 7% at Haslett Avenue West, with only very small numbers at the part time rank near the High Street opposite the Hive Bar and Ifield Road rank locations.

Rank usage overview

3.6 The rank observations were factored to estimate a typical week of demand in terms of passengers. The table below provides the results:

Rank	2022		2017		2014	
	Pass	%	Pass	%	Pass	%
Three Bridges Railway Station Crawley	4,356	84	4,635	73	4,478	71
Haslett Avenue West, Crawley	348	7	106	2	327	5
Boulevard, Crawley	239	5	775	12	825	13
Opposite Jubilee Oak (High St), Crawley	222	4	721	11	352	6
Ifield Road, Crawley	0	0	0	0	Not there	
Opposite Hive Bar (High St, Crawley) (Part time rank) (2200 hours to 0600 hours only)	13	0.3				
Station Way, Crawley	Gone		66	1	270	4
Railway Station, Crawley (Temporary)	Revised		16	0.0	80	1
Total	5,178		6,319		6,330	
Difference from previous survey	-18%		-0.0			

3.7 For the current survey, as in all previous surveys, the bulk of passenger demand occurs at Three Bridges Railway station. The proportion has increased since both the 2017 and 2014 surveys. This rank provides some 84% (was 73% and 71% in previous years) of all estimated passenger demand at ranks in the total Crawley licensing area.

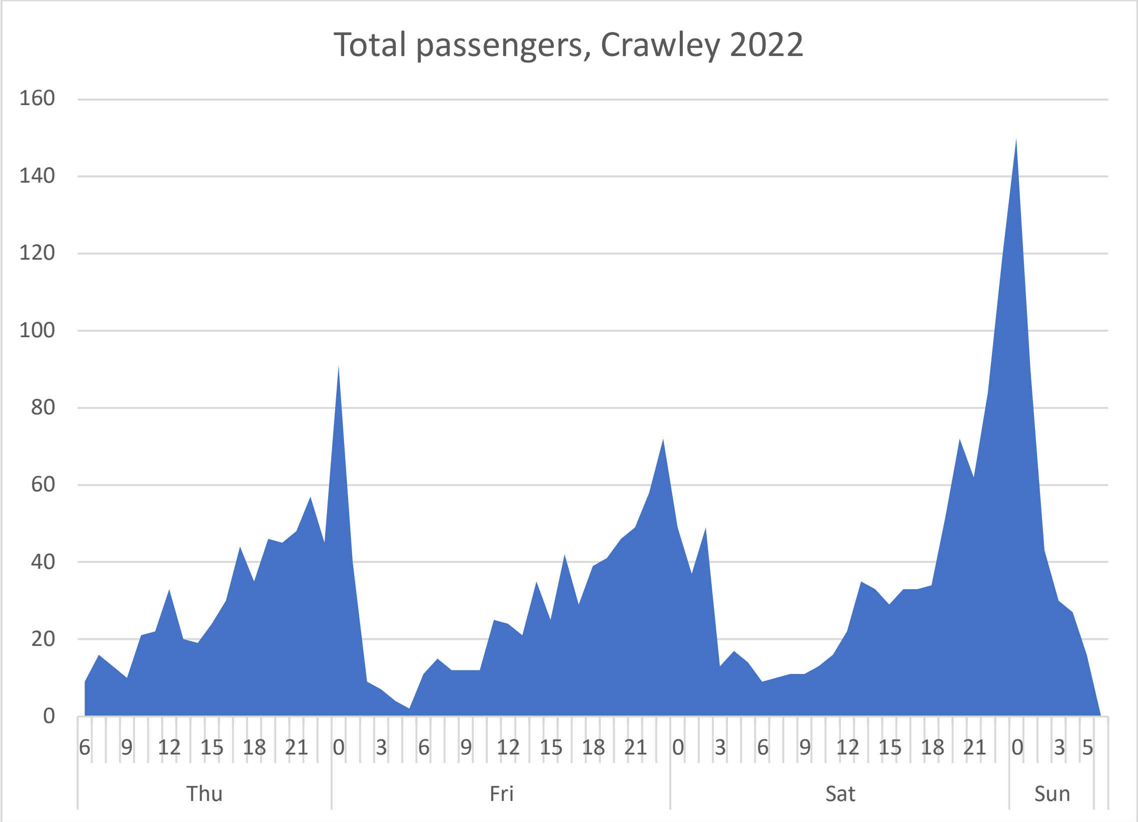
3.8 Haslett Avenue West rank, Crawley is second with 7%, although this is an increase from 2017 yet with relatively similar flows in 2014. This may be in part due to the closure of the established rank at Crawley Railway Station.

3.9 Both the Boulevard and the High Street (opposite the Jubilee Oak public house) ranks in Crawley have seen significant reductions in passengers since 2017. The temporary rank opposite the Hive Bar saw some usage.

3.10 It is understood that the closure of a major store within the town centre has reduced the overall footfall for the Boulevard rank.

3.11 In this survey, the proportion of passengers from the non-station ranks is some 16%, reduced from the 27% of 2017 and the 28% of 2014.

3.12 The graph below demonstrates the overall picture of rank usage over the observation period.



3.13 The graph first shows that the area has roughly similar demand profiles for Thursday and Friday (with the Friday peak lower than the Thursday), with Saturday seeing an overall much higher peak, but flows growing much more slowly first thing and declining less quickly later.

3.14 Average flows on Thursday are 29 passengers, 31 on Friday and 41 Saturday, not particularly different. Overall average flows are 34 passengers per hour, not particularly high. These values reduce further when considering loaded vehicles and paid trips.

3.15 There is no hour during the survey period when there is not a passenger at a rank somewhere in the area. This is remarkable given the low flows generally observed at all ranks across the full licensing area. There are very few of our recent surveys that have seen no hours with zero flows, particularly for smaller town surveys. This is a positive impact for drivers meaning demand exists at all hours.

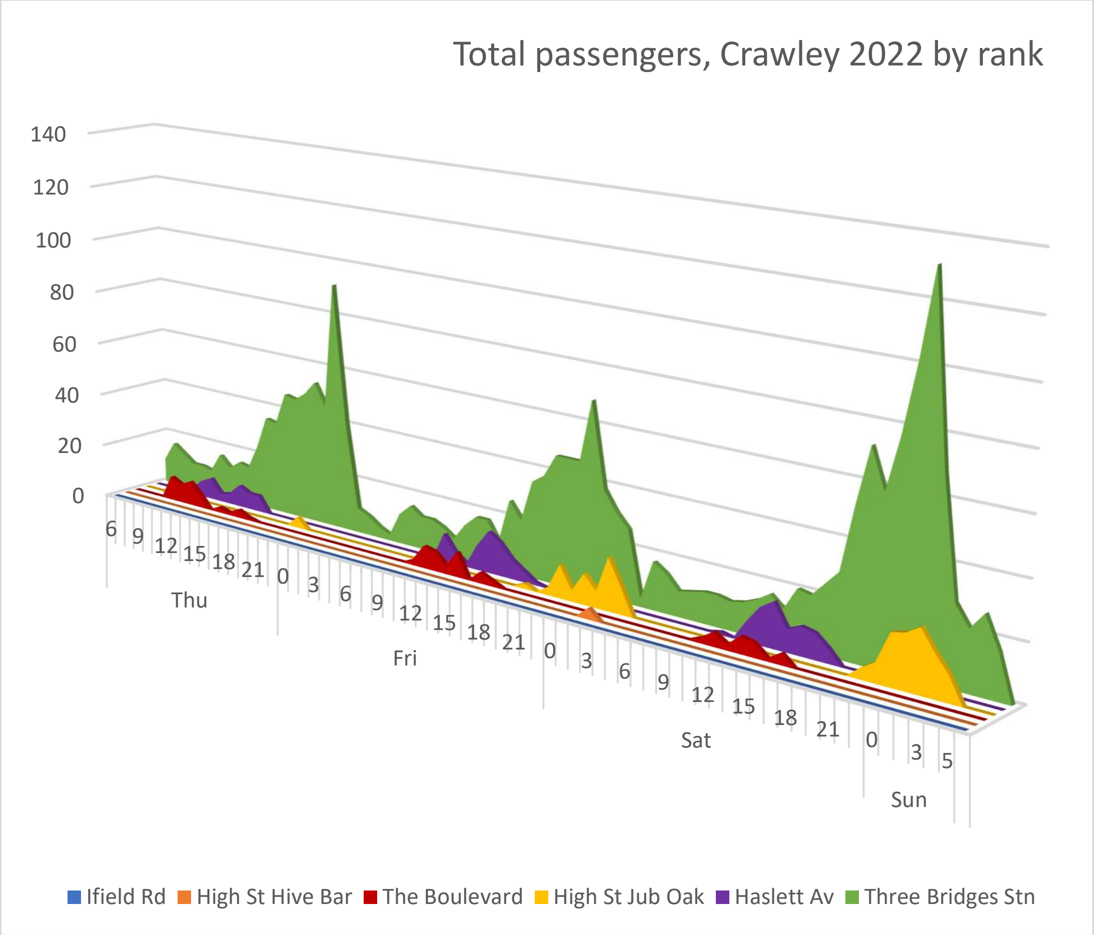
3.16 In terms of night demand, our survey found there were always passengers in every hour of our survey at Three Bridges Railway Station, with the minimum observed being two passengers at 05:00 hours early on the Friday morning.

3.17 Demand from local night life was observed being collected from the High Street (opposite Jubilee Oak) rank in every hour between 21:00 hours and 03:00 hours but only Friday/Saturday and Saturday/Sunday. Some private hire vehicle pick-ups were also noted at this point using the booking office here and the rank, but most booked pick-ups would have been from the non-rank allocated parking spaces or from within the road if the spaces were filled with parked vehicles. As noted elsewhere, the bulk of hackney carriage pick-ups here were in WAV style vehicles, and with a tendency for larger groups of passengers.

3.18 It was noted that although the largest night club had closed, many more venues were now open mainly around High Street including one location open from 22:00 hours to 04:00 hours Fridays and Saturdays at the northern end of the High Street.

3.19 On the other hand, there are just two hours when total passengers exceed 100 – 23:00 hours Saturday sees 119 and the following hour 150 total passengers. The next highest flow is 91 for the midnight hour Thursday. The Friday night peak only reaches 72 at 23:00 hours

3.20 The following graph compares each site over the observation period:



3.21 The Council designated ranks give significantly lower demand, with the Haslett Avenue West rank busiest during the daytime and more so on Fridays and Saturdays, whilst The Boulevard tends to be daytime only, with several peaks, and busiest on Fridays (albeit for a dip in passengers in the 13:00 hours and 15:00 hours in the afternoon). The High Street (opposite Jubilee Oak Public House) rank is busiest and most consistently so on the Saturday, all during the evening / early mornings (22:00 hours to 03:00 hours both nights). It is little used on Thursdays. This matches the opening hours of many venues.

3.22 Three Bridges Railway Station rank dominates flows day in day out, seeing with some passengers in every hour, with a lower Friday peak on than the Thursday, with both much less than the Saturday.

Disability usage of ranks

3.23 During the course of our observations, there was usage by one person in a wheel chair. This was at Haslett Avenue West rank.

3.24 A further 22 were observed to need assistance to enter the vehicles (but who were not specifically in wheel chairs), with 12 at the Boulevard, 9 at Haslett Avenue West and just one person at Three Bridges Railway Station.

3.25 In terms of wheel chair accessible vehicles, half of vehicle movements observed as hackney carriage appeared to be wheel chair accessible style (higher than the 43% of 2017). This is higher than the percentage in the fleet (19%) which suggests that many of these vehicles focus on rank work, more so than the saloon style vehicles. It is noted that many of the wheel chair accessible style vehicles are within the fleet to meet specific requirements for school contracts.

3.26 The small number of hackney carriage movements at the part time rank opposite the Hive Bar in the High Street, and at Ifield Road were all WAV style. The Jubilee Oak saw 90% of its vehicles apparently WAV Style, Three Bridges Railway station 51%, Haslett Avenue West 37% and the Boulevard just 9%.

3.27 These values of WAV vehicle proportions are interesting given the focus of people needing assistance being at the Boulevard and Haslett Avenue West ranks which both saw less wheel chair style vehicles across the survey. It suggests a prime use of WAV style vehicles is for their higher capacity rather than their accessibility.

Issues with other vehicles at ranks

3.28 80% of all movements observed were hackney carriages. Goods vehicles and private hire accounted for just 1% of observations. Out of town and emergency vehicles were observed, but at negligible levels. The main other user of ranks were cars, seeing 18% of the movements. The apparent misuse was worst at The Boulevard (74% were not hackney carriages) and at the High Street (Jubilee Oak) (54%) with Three Bridges Railway Station only seeing 5% and Haslett Avenue West just 3% of movements not hackney carriages. These values relate to the design of these two locations, and to the high pressure for parking space particularly in the High Street.

3.29 For the High Street (Jubilee Oak) location, our observations saw several times when hackney carriages had to load outside the rank because of parked vehicles. This is a safety issue for passengers and general road users in this area. It is certain that the passengers being picked up from the neighbouring private hire booking office will also suffer the same safety issues given there will rarely be space for their vehicles to pause off-carriageway to pick up.

3.30 The situation in the location further up the High Streeet opposite the Hive Bar was worse, with the spaces usually full of parked vehicles from 19:00 hours through to 23:30 hours with very few spaces left. However, a small number of hackney carriages did use the rank, sometimes waiting for a space to appear in the main carriageway. Again, this is a public safety issue and the rank needs urgent enforcement.

Plate activity levels

3.31 A test was undertaken on the Friday of the rank observations to identify at key locations how many plates were active. This allows an estimate of the number of plates needed to meet demand at the measured level, and also allows any potential for 'playing-up' to the survey to be considered, i.e., were there a high proportion of vehicles active when the survey was being undertaken.

3.32 Sample observations were undertaken at the Boulevard rank between 14:00 hours and 15:00 hours on Saturday 10th September 2022, and at Three Bridges Railway Station between 16:00 hours and 18:00 hours, 18:30 hours and 20:30 hours and 21:30 hours to 23:00 hours (all Saturday 10th September 2022).

3.33 During the course of the hours observed of the 177 observations, 102 observations were identified as valid local hackney carriage plates. Just two local private hire vehicles were observed with 73 observations that did not prove possible to identify.

3.34 Of the current fleet of hackney carriage plates on issue, 33% of the total were seen at least once on that day (almost half the equivalent value of 59% of 2017). Just two plates were observed active in the period near to the Boulevard rank, with 15%, 20% and 16% of the fleet observed in the three periods near Three Bridges Railway Station rank.

3.35 At Three Bridges Railway Station, as in the previous survey the busiest period was the 18:30 hours to 20:30 hours although again for this survey about half the number of plates from the fleet were seen compared to the level in the 2017 survey (20% compared to 41%).

3.36 The most frequent plate was seen seven times.

3.37 There were just two plates observed at the Boulevard rank (opposite Marks and Spencers). One of these was also seen at Three Bridges Railway Station, with the other plate only seen at the Boulevard Rank, (opposite Marks and Spencer).

3.38 These observations suggest a strong reduction in the number of hackney carriages active at ranks, although these observations did not include the Haslett Avenue West rank where it appears more vehicles now go than in previous surveys from the rank observations. This increased patronage is likely to be attributable to the closure of the established rank at Crawley Railway Station during building and renovation works.

3.39 There is no evidence from this survey that there was any specific ‘playing up’ by the Trade to the observations being undertaken.

3.40 We were advised by a trade representative that during September 2022 many hackney carriage drivers remained away visiting friends and relatives after the end of pandemic restrictions. Most returned by October 2022.

3.41 The trade representative also advised us that demand for hackney carriages at ranks was at a peak in September after which the growing cost of living crisis tended to suppress demand.

Extent of passenger waiting

3.42 A review of the calculated average passenger delays for the survey data found just nine hours of those observed that had average passenger delay a minute or more. A further 15 hours saw some average passenger delay in an hour, but 59 seconds or less. This means there are only 24 hours of the 268 analysed that have any passenger waiting, or 9% of hours.

3.43 Another measure is the number of passengers who experienced a wait. In total there were 97 during the hours observed. Of these 80 (82%) had waits between one and five minutes, 13 (13%) waited six to ten minutes and four waited 11 minutes or more.

3.44 The 97 that experienced waits were 4% of the total number of passengers observed during the surveys. This is not high.

3.45 The longest average passenger delay observed was 4 minutes 13 seconds, at The Boulevard at 13:00 hours on the Friday. The next largest average passenger delay was 2 minutes 28, also at 13:00 hours Friday but at Haslett Avenue West. The third highest delay occurred twice (1 minute 35 seconds each time), with both at Three Bridges Station at 13:00 hours and 15:00 hours Friday. The latter of these two occurrences was the hour seeing the longest observed passenger wait of just under 16 minutes.

3.46 These hours may see less trade activity arising from personal commitments at these times, or possibly contract commitments.

3.47 The top seven average passenger delays were all during Friday daytime, with four of these at Three Bridges Railway Station, one at The Boulevard and the final two at Haslett Avenue West ranks.

3.48 Of the 24 hours with average passenger delay, 14 were at Three Bridges Railway Station (58%), five at Haslett Avenue West (21%), four at The Boulevard (17%) and just one at the High Street (Jubilee Oak) rank.

3.49 In conclusion, although unmet demand exists and people do have to wait, the level and extent of such waiting is small. Further review of this and its interpretation in terms of significance of unmet demand follows below.

3.50 Further, if more drivers had been active, the levels of unmet demand may well have reduced although it is not guaranteed that those not at work in September would necessarily operate at different times.

3.51 It must be pointed out that a hackney carriage demand survey focusses on observed activity at hackney carriage ranks. There is no requirement for observation of private hire activity (nor often little easy opportunity to do so).

3.51 Hence, no record was made of private hire activity near the two booking offices known to exist (Crawley Railway Station and near the United Cars office adjacent to the High Street Jubilee Oak rank.

3.52 The council is aware of significant waiting times for private hire bookings. This is so severe that they have also been made aware that operators are offering people shared bookings, which the Council does not believe is best practice.

3.53 Around the country we are aware of severe driver shortages that are leading to many private hire companies restricting their operations which provides more custom to hackney carriages at ranks than hitherto. This does allow some hackney carriage drivers to earn their 'required wage' in a shorter time and in more preferable operating hours than before, leading to poorer service at other times.

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4 General public views

4.1 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.

4.2 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.

4.3 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.

4.4 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 (eg of students, or a sub-centre), although conclusions from these separate samples can only be indicative taken alone.

4.5 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.

4.6 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.

4.7 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.

4.8 For this study, a total of 188 (225 in 2017) persons were interviewed providing a similar sample size to that undertaken in the previous study. The sample covered 50 at Three Bridges Railway Station with the balance in and around Crawley town centre. The interviews were in November and very early December 2022.

4.9 The interviews were during busy daytime hours both to maximise response and minimise any safety issues to staff collecting the information.

4.10 We have found significant difficulty during 2022 in any interaction with the public in night hours, with increased unwillingness of people to be interviewed at those times plus aggressiveness if interviews were undertaken. For this reason, any consideration of later interviews was not taken forward for this survey. This has also made recruitment of even our trained staff to undertake any such work almost impossible.

4.11 To avoid issues for interviewers, an estimate of age and gender was made by the interviewer and recorded after completion of the interview.

4.12 Comparison was made to the estimates of gender and age splits from the initial information from the 2021 census. For this survey, our sample interviewed about 4% more people appearing to be males than the census suggests. For age groups, the under 30's were under-represented in our sample (12% compared to 23% in census), as were the mid-group (41% compared to 47%) with the balance being a high over-representation of the older group (46% compared to 30%). In 2017 a similar pattern was observed between census and survey although at that time there was a better correlation with the younger group and not such a marked difference in the proportion of older persons interviewed. This may tip the balance towards more hackney carriage usage although this impact should not be significant.

4.13 For the full sample, a very high 87% said they had made one or more trips by licensed vehicle in the area in the past three months. This is significantly higher than the 26% of 2017.

4.14 44% had done so by hackney carriage only, 32% had done so by private hire only and 11% by both types of vehicles. The level of hackney carriage only usage was much higher in the Three Bridges Railway Station sample (54%) (as in 2017) although the Crawley town centre interviews value was still high (40%).

4.15 People were asked if they did not use a hackney carriage at all, why they did not use them. 49% of respondents answered (with a number of multiple responses provided). The strongest response was that people preferred vehicles to come to them (55%), followed by other transport being cheaper (14%), not wanting to walk to a rank (9%) and not wanting to hail (7%).

4.16 In total, 15% said 'other' with the largest proportion of those saying they had an issue that hackney carriages did not offer 'fixed' fares (i.e. quoting a price beforehand). This does suggest people broadly understand the difference between hackney carriage and private hire in that respect. 36% of the 'other' category said they had no need to use and 14% told us they had a car. Just 7% of the 'other' group said hackney carriages were too expensive.

4.17 All told us how often they used licensed vehicles. Using these responses, we estimated overall trips per month per person. On average, across the full set of people interviewed, people made 3.8 trips per month, higher than the 1 trip per month estimated in the previous survey.

4.18 The value for Three Bridges Railway Station sample was higher at 4.7 trips per person per month, whilst the Crawley town centre interview value was lower at 3.5. This estimate is later compared to the value for purely hackney carriages.

4.19 People were asked how they normally got a licensed vehicle within Crawley Borough Council area. Most answered, with several giving more than one answer. Over all interviewees that responded, 54% (15% last survey) (split 66% Three Bridges Railway Station, 50% Crawley town centre) said they got licensed vehicles at a rank. 40% (49%) said they telephoned a company, 5% used an app (none last time, but 33% in 2017 said they used smartphones) and none (1%) hailed. None (same as last time) used a freephone.

4.20 This is a strong shift towards usage of ranks against mainly use of smartphones, although there has also been a clear switch to people now using apps although this appears to be at a relatively low level. Again, the rank proportion was higher at Three Bridges Railway Station with reduced telephone usage levels there.

4.21 Seven (five in 2017) different private hire operator companies were quoted as used. Two were only quoted by two people each, with the remainder having between 12% and 34% of the mentions made. 47% of respondents suggested companies, with 60% of these naming a single private hire operator company, 34% two and just 6% three companies. Interestingly, of these five persons, three quoted the same three private hire operator companies although all in a different order.

4.22 The largest quoted private hire operator company gained 34% of mentions, followed by 23%, 16% and two with 12%. The company with 16% of mentions was not quoted in 2017, whilst the other four were. The top company in 2022 had gained the third most quotes in 2017 whilst the third company had seen 49% in 2017 but only 12% now. The second most quoted company gained about the same level of shares this time (23% compared to 25%). One national app company now had 12% of mentions compared to none in 2017. This was the only app quoted as being used and placed them fourth equal in company named quoted.

4.23 Interviewees were then asked about their specific usage of hackney carriages in the area. Of those responding, 29% (82% last time) said they could not remember when they had last used a hackney carriage in the area (a significant reduction and therefore suggesting increased usage), and 2% now (as in 2017) said they could not remember seeing one in the area. Both values were higher in the Crawley town centre responses suggesting the hackney carriages are much more in peoples' sight at Three Bridges Railway Station than generally in the Crawley town centre area.

4.24 The hackney carriage responses were used to provide estimates of usage and resulting values were compared to those for use of all licensed vehicles and to the proportion saying they got licensed vehicles from ranks. Usage of hackney carriages estimated was 59% the level of total usage, very high, and in the same order of magnitude as the 54% saying they got licensed vehicles from ranks.

4.25 The values varied between Three Bridges Railway Station and Crawley central area interviews with 92% of trips per month at the station using hackney carriages and 88% in Crawley. The number of trips per month was 4.4 at Three Bridges Railway Station and 3.1 in the Crawley central area interviews, giving an average of 3.4 trips per person per month overall.

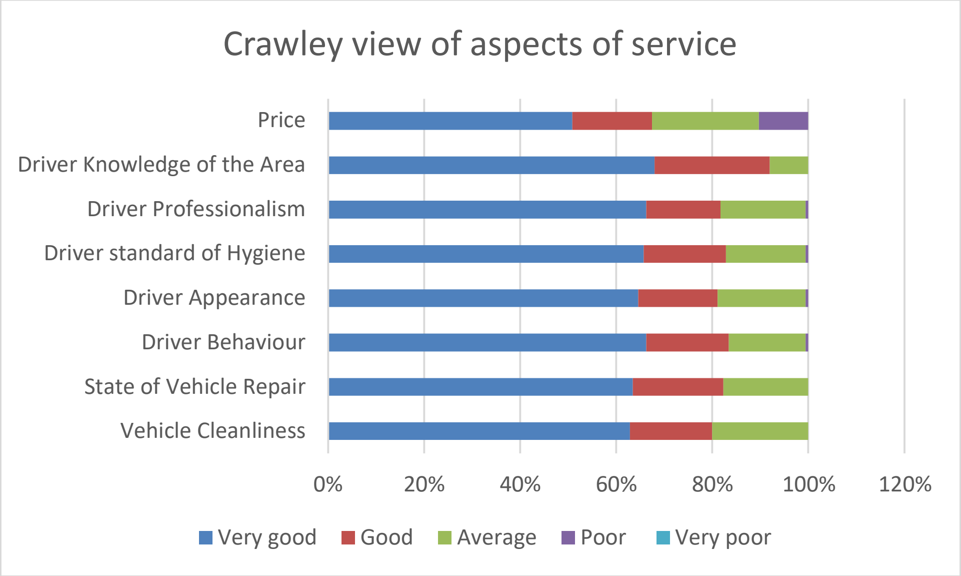
4.26 We also asked about the ranks people were aware of. Three quarters told us between one and three ranks they were aware of. Of these people, 4% named three ranks, 27% two and the remainder just one rank. 73% of those naming a rank said they did use the rank they had named (higher than the 50% of the previous survey). In total, there were 142 mentions of ranks by all persons interviewed. This was a much higher response than in 2017 when hardly anyone responded regarding ranks they knew or used.

4.27 Across all these interviews, the top rank quoted was Three Bridges Railway Station (39%) followed by the Haslett Avenue West rank (near the bus station) (28%) and Crawley Railway Station (24%). However, at Three Bridges Railway Station, nearly all responses were for the Three Bridges Railway Station rank with just seven actual responses for other locations from interviews undertaken at Three Bridges Railway Station. Even when considered on their own, the proportion of total Crawley surveyed responses saying Three Bridges Railway Station remained high at 23%, with the Haslett Avenue West (near the Bus Station) rank gaining 38% in that specific sample.

4.28 In the last survey (2017) we found little awareness of the Three Bridges Railway Station rank by those interviewed in Crawley central area. This change could be people transferring to use of Three Bridges Railway Station given its rail service is more frequent and less susceptible to delays and cancellations. This difference would have been made worse by passenger experience during the various lockdowns where 'branch' and smaller station services were often sacrificed to maximise main station and main line operations.

4.29 The Boulevard Rank (opposite Marks and Spencer) only obtained 3% overall and 4% in the specific Crawley central area sample. It is interesting to notice the view that Crawley Railway Station has a rank (it has always been a booking office-focussed site). There was no mention made of either the High Street rank opposite the Jubilee Oak nor that opposite Hive Bar, the ranks servicing night life in Crawley. This may partly result from our not being able to interview people at such times safely, but we would also usually expect responses about these ranks within the sample of people we spoke to.

4.30 People were asked to rate the service provided in the area for a range of elements. Some 93% provided their ratings. The graph below shows the results.



4.31 This shows the dominant view of those providing their comment is that the service provided in all areas is dominated by 'very good' scores. Apart from for price there are no 'poor' scores and no 'very poor' at all. Driver knowledge of the area is marginally the highest scorer.

4.32 The worst performing element with 51% very good (which is still high) is, as usual, price. This scored the only poor score (10%). This left 68% stating prices was very good or good, an encouraging result.

4.33 In terms of changes that might increase peoples' usage of hackney carriages, many people provided multiple responses. Of the total responses, 57% in total said 'if they were more affordable'. 15% wanted more hackney carriages to phone for and 8% wanted more hackney carriages to hail or obtain at ranks. 15% said other - with 58% of these responses being 'nothing' and 23% 'I don't need to use them'. The only specific quote was 13% of these 'other' mentions suggesting use would be increased if an app was provided.

4.34 In terms of needing adapted vehicles, 80% (very similar to the 84% of the 2017 response) said they did not need, nor know anyone who needed one. Of those needing an adapted vehicle, the bulk said they knew someone who needed a WAV, rather than any other kind of adaptation. This response has increased towards need of WAV from 2017 responses.

4.35 People were asked if they had given up waiting or made other arrangements when trying to get a hackney carriage at a rank anywhere in Crawley Borough Council area. No-one interviewed at Three Bridges Railway Station had any issue getting a hackney carriage. However, nine said they had given up in Crawley central area, with all but one of these at the Haslett Avenue West (bus station) rank.

4.36 Most reacted when they gave up waiting by phoning someone to collect them. Ignoring the other person who gave up waiting at Crawley Railway Station (where there is no active rank), this provides a rank-based latent demand factor of 1.05. This is increased from the level of zero in the 2017 responses.

4.37 With reference to if people thought there were enough hackney carriages in the Crawley area, for Crawley respondents 48% felt there were, 11% felt there were not and 41% were not sure. For the Three Bridges Railway Station interviewees, 64% were sure there were enough, 26% were unsure and 10% felt there were not enough. This reflects the focus of vehicles at the station.

4.38 Interviewees were asked how they thought their usage of licensed vehicles had changed compared to pre-COVID. Many made multiple responses. Of all responses, 41% said they use hackney carriages about the same with 37% for private hire. 12% said they used hackney carriages more, but 3% said less, a net gain of 9%; whilst for private hire the values were 5% more and 3% less, a net gain of 2%. This seems to back the suggestions of increased usage of hackney carriages at the present time.

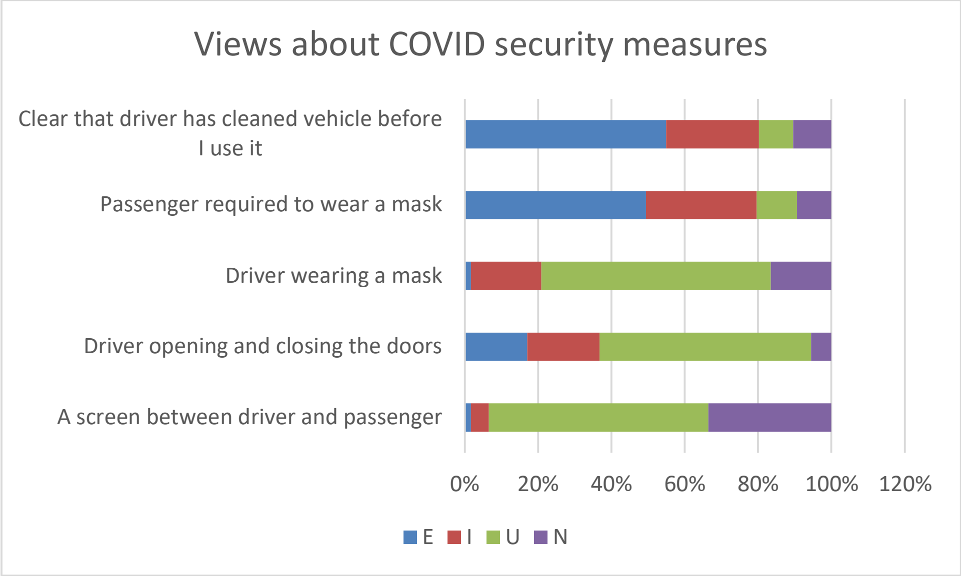
4.39 People were asked how easy they felt it was to get licensed vehicles now compared to pre-COVID. Some people provided more than a single response to this question.

4.40 Of the total responses, the highest was 32% saying it was harder to get a hackney carriage from a rank now. However, 22% said it was easier to get a hackney carriage at a rank now. 25% said it was easier to phone and get a private hire now. Other responses were 10% or less. This shows a range of public views and no clear single view suggesting a wide range of public experience.

4.41 Looking forward, 44% felt their future usage of hackney carriages would be the same with 35% for private hire, 11% felt they would use hackney carriages more (but 1% said less, i.e. a net gain of 10%) with private hire values 7% more and 2% less, a net gain of 5%. This suggests higher gain for hackney carriages than private hire but not to a significant degree

4.42 Overall these figures suggest more usage of hackney carriage than private hire, but no overall loss to either type of vehicle.

4.43 When asked regarding the COVID security measures people thought might be essential, important, unimportant or not important the following results were obtained (about 97% of interviewees provided a response):



4.44 The overall view suggests it being clear that the driver has cleaned the vehicle before they used it was the most essential, followed by passengers wearing masks This was followed by the driver opening and closing the doors. Screens were no longer particularly important nor was drivers wearing masks.

4.45 All interviewees told us if they lived in the area or not. For the full sample, 95% were from the Crawley Borough Council area.

5 Key stakeholder consultation

5.1 The following key stakeholders were contacted in line with the recommendations of the Best Practice Guidance:

- 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

5.2 Comments received have been aggregated below to provide an overall appreciation of the situation at the time of this survey. In some cases, there can be very specific comments from one stakeholder, but we have tried 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.

5.3 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.

5.4 A google form was set up for people to provide their response. All respondents chose to use this method. A total of nine responses were received, from the following categories (chosen by the respondents):

- A bar and nightclub
- A cocktail bar
- Four pubs
- A pub / club
- A social club
- A supermarket

5.5 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.

Overall responses

5.6 All nine said their customers used local licensed vehicles. They suggested 22% would get from a rank, a third using their own mobile phone, 22% using a venue phone, 11% would ask the venue to book and 11% would use a mix of their own phone, the venue phone and asking the venue to book.

5.7 A third said they were aware of ranks their customers might use. 45% were not aware and 11% said they were not aware but that was because they were not near any rank. 11% named two companies their customers would use.

5.8 56% said they received complaints. 11% got compliments and 22% did not get complaints. 11% said the only issue was wait times and not feeling safe while waiting.

5.9 Comments made were:

- Taxis will not pick up from the venue and people have to walk round to the rank
- The majority of (taxis) have been charging time and a half over weekends which has affected taxi usage and reduced the number of people willing to come out
- A similar comment but that people were now walking home
- Late bookings
- Variation in price of taxi
- Not enough taxis on weekend evenings

Other entertainment venues

5.10 There was no response.

Restaurants

5.11 There was no response.

Hospitals

5.12 No response was received from local hospitals.

Police

5.13 No response was received.

Disability

5.14 A very detailed disability survey was issued by the Council to relevant persons (see separate chapter following).

Rail and other transport operators

5.15 No comment was provided by other transport operators.

Other Council contacts

5.16 No other comment was provided from those contacted.

Summary of public stakeholder consultation exercise

5.17 This is disappointing (but not as much as in some places recently where there has often been no response at all) but given this consultation is not statutory, and the current tendency is for people not to respond unless they are directly answering a question that might lead to custom, there is little more that can be done. The only pointer is that, were there key issues, people would take opportunity to respond. The Taxi Licensing Service has not received any feedback either.

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6 Trade stakeholder views

6.1 The Best Practice Guide 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.

6.2 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.

6.3 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 as was the case in this survey. 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.

6.4 In all cases, we believe it is essential we document the method used clearly and measure response levels. The Council issued all letters to the local trade, with a total of 482 (461 in the previous survey) letters being issued. There were 211 hackney drivers, 37 operators and 897 private hire drivers. Many of the 123 hackney carriage and 565 private hire vehicle owners were covered already by being existing licensed drivers.

6.5 By the time the consultation closed, there were some 63 responses. There were 85 during the 2017 consultation.

6.6 On receipt of the responses, a check was undertaken to ensure there were no obvious duplicates or any other out of course entries. There were no clearly suspicious or erroneous entries found.

6.7 92% of the respondents said the licensed vehicle trade was their only or main source of income. None said they were not currently working but planned to return when demand increased again. 5% were working part time and had other additional sources of income. 3% were working part time but had no other sources of income. None of those replying said they were not working and had no intention of working in the licensed vehicle trade in the future.

6.8 79% (61% last survey) of respondents said they drove hackney carriages and 18% (38%) said private hire, with 1% saying they drove both. Again, nationally our driver surveys are now seeing more response from private hire than has been the case but this response suggests strong hackney carriage wish to respond.

6.9 The average length of service identified was 11.5 years, about the same as in 2017. The longest quoted was some 38 years (was 43 in 2017 which suggests some more experienced drivers may have retired, a national current fact). When considering the spread of service, the largest proportion, 26% of respondents, said they had worked up to 5 years. 23% each had worked either 6-10 or 11-15 years with 15% between 16 and 20 years. 2% said they had worked two years (suggesting they began either during or just before the pandemic). 5% said one year.

6.10 The highest percentage, 36%, of those responding said they worked six days (same as 2017). 23% (27% 2017) said five days, 23% (18% 2017) seven days, 5% (9%) saying three days, 4% (7%) four days and 4% (2%) just two days. The actual average number of days worked was five (again as in 2017).

6.11 The average hours worked were 40 for hackney carriage / dual users and 45 for private hire. Maximum hours quoted were 82 (a private hire). In the previous survey longest hours quoted were 75 and the average for all types of vehicles was 41 (same now). This suggests a marginal reduction in the length of time people need to work to make their expected living, a typical finding at the present time.

6.12 94% owned their own vehicle, with just 6% (only one person in 2017) saying that someone else also drove the vehicle they used. This had not changed post COVID but does suggest an increase in sharing since the last survey.

6.13 Respondents were asked the kind of work they normally undertook. All but two provided at least one response (52%) with two each providing none, three or five responses (3% each), 5% (3) providing four responses and the remaining 33% (21) giving two responses. Of the total responses provided, 49% were immediate hire, ranks; 23% school contracts; 11% immediate hire, bookings, 8% advanced hire, 4% private client contracts, 3% social services contracts, 1% chauffer or corporate work and 1% transporting medical goods. This suggests quite a wide workload, but with nearly half being rank-based.

6.14 56% of the hackney carriages responding said they only obtained work from immediate hire from ranks. A further 31% got their work from ranks and school contracts. 2% of responding hackney carriages did not say they obtained any work from ranks and got work from immediate hire bookings and advanced bookings. The remaining 11% did immediate hire from ranks but supplemented this with other sources.

6.15 For private hire, 27% just obtained work from immediate hire, bookings. 18% said they got work from immediate hire bookings and advanced hire, with the remaining obtaining work various ways, some undertaking a wide range of different work.

6.16 42% said they accepted pre-bookings. 56% said by phone, 20% by office and 20% through return customers. 4% said via an app.

6.17 Respondents were asked about what determined when they worked. However, the results were not conclusive, with most tending to suggest they worked around family commitments, or when they knew they had work such as for school contracts.

6.18 In terms of use of ranks, nearly all hackney carriage respondents provided three ranks. The most frequently quoted was Three Bridges Railway Station (36% of all responses). The Boulevard Rank (opposite Marks and Spencer) gained 22% (split between being called Marks and Spencer and The Boulevard). High Street obtained 14% (not confirmed which rank) with the Haslett Avenue West Rank (near the bus station) 21% (but split between County Mall, McDonalds and Bus Station). 5% said Crawley Railway Station.

6.19 97%, including most of the private hire, said that the limit policy remained the correct policy for the area. None offered any specific reason at this point why this was the case but most made comment in other questions (see below).

6.20 All but two respondents felt there were enough hackney carriages in Crawley at the present time. Nearly all made it clear the queues of vehicles waiting at several ranks were the main reason they felt this was the case. Even private hire were aware of this.

6.21 The question was asked how the current limit on hackney carriage vehicle numbers benefitted the public. Nearly all provided a response to this question. However, most focussed on there being no perceived need for more vehicles and the negative impacts if more were added. Some explained the lack of night life did not help make use of available vehicles. Some encouraged thought of reducing the limit. A small number said the limit encouraged quality of service and better opportunity for maintenance. However, what was clear was a general support for retaining or reducing the limit, and a strong discouragement for allowing any more hackney carriage vehicles.

6.22 When asked about frequency of people using wheelchairs, both directly and transferring, in both cases the most frequent response was yearly (44% for direct and 48% for transfer), for bookings it was monthly (18% and 19%) and for contracts it was daily (18% and 11%). However, 'never' was the response for direct usage for 38% of those at ranks, 57% bookings, 80% contracts with 39%, 60% and 87% respectively for those transferring. In summary the most frequent wheelchair users tend to provide contract work, followed by booking and finally use of ranks.

6.23 30% of drivers were aware of those who had given up working due to the impact of COVID on the industry. Numbers ranges from one to six per person responding.

6.24 Nearly all took opportunity to explain how the pandemic had impacted their businesses. Several said they had not worked, for various periods from three months to two years. Many pointed out income had reduced. Others said demand had changed particularly with people working from home. Several private hire that worked Gatwick Airport said that source had effectively been closed for two years. However, one said they were now busier than pre-pandemic but did not say where they worked or where the extra custom was from.

6.25 Most also discussed the future. There were four responses that made positive suggestions of the way forward for hackney carriages including:

- Better signed ranks (illuminated)
- More ranks
- Use of bus lanes
- Enforcement of ranks
- Concern over issues of private hire being allowed to operate too close to ranks and providing misleading information

6.26 Several others also picked up one or two of these points which is encouraging that people are making suggestions for moving the hackney carriage trade upwards.

6.27 Six hackney carriage and one private hire driver provided further details to allow more contact although given the high level of response, and the long time given to reach this level, none were contacted further at this time.

6.28 When asked how rank trip numbers had changed since three years ago, 67% said less, 15% about the same and 17% more. For bookings (with less respondents) 55% said less, 23% about the same and 23% more. As is typical around the country, this suggests there has been varying levels of change but generally a little more for bookings.

6.29 Finally, option was provided for any other comments to be given. One person was grateful for the good service provided by the licensing section. Others wanted restrictions reduced whilst two said more plates were needed and another felt the limit was unfair to private hire drivers who could not compete. One felt any reference to anything other than ranks, e.g. asking about school contracts was totally irrelevant and inappropriate to an unmet demand study.

6.30 Just under half of those responding provided final comments. Most were reiterating the concern at possibility of issuing any more licences and commenting there were already too many and too few rank spaces. Removal of parked vehicles in ranks was again noted, as well as concern over a major app operator and the existence of booking offices in key locations which they felt were not easily distinguishable from hackney carriages.

Trade Input

6.31 One trade representative took our offer of an opportunity to provide their views about the current situation in Crawley. The paragraphs below are their views and not those of the writer of this report.

6.32 They told us they represented 130 drivers and had themselves worked as a hackney carriage driver for 23 years. They reported the trade and work had been very good 15 years ago. Now most night-time trade had disappeared and the three major clubs that had existed had gone.

6.33 Further, the town centre main food store had closed that meant demand at the related rank there was significantly less demand. They quoted recent waits for fares at the station of up to 80 minutes.

6.34 They were aware from demand levels that a lot of people remained working from home.

6.35 They had recently added school contracts to their portfolio after a long period of not feeling they were necessary.

6.36 They said a lot of night venues told them they could no longer get private hire bookings for their customers, and that others told them private hire fares were now higher than hackney carriage.

6.37 They felt that the rank survey work being in September had chosen a time when there were more passengers, and some trade members still not back from longer visits to relatives. By October, the impacts of the cost of living were being felt more so they felt less people were undertaking hackney carriage trips whilst most drivers were then back at work.

6.38 They considered about 10% of hackney carriages worked for private hire circuits.

6.39 They told us that many hackney carriages had remained registered albeit with absent drivers principally because the limit existed and because they did not want to lose the licences. They considered the retention of the limit was critical to a healthy hackney carriage future and were concerned where the rank space might be found were more plates to be issued.

6.40 They thanked us for the opportunity to provide their views.

7 Evaluation of unmet demand and its significance

7.1 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 whom 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.

7.2 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.

7.3 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.

7.4 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.

7.5 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.

7.6 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.

7.7 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 hours to 18:00 hours (i.e. eight hours ending at 17:59 hours). 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.

7.8 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.

7.9 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.

7.10 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.

7.11 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.

7.12 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 to 1.2 for January / February.

7.13 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.

7.14 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.

7.15 The latent demand factor was added following a court case (R v Castle Point, 2002, see para 1.25 for further detail). 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).

7.16 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.

7.17 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.

Element	2022	2017	2014
Average passenger delay (mins)	0.17	0.03	0.017
Off peak level of delay	17.19	10	2.3
General incidence of delay	7.0	0.7	Zero
Peakiness of Demand	0.5	0.5	1
Seasonal Factor	1	1	1.2
Latent demand	1.05	1.0	1.137
Overall index of unmet demand	10.53	0.12	Zero

7.18 For Crawley in 2022, the demand profile remains peaky. This means that all other values in the equation are effectively half the measured level, allowing for the relative difficulty in meeting such peaks in demand.

7.19 For the 2022 survey, information, off peak passenger queues were observed in 17% of hours, compared to the 10% in 2017 and none in 2014 (the latter that set the overall index to zero).

7.20 Considering the other parts of the index, the level of average passenger delay has increased to 0.17 seconds, the proportion of passengers travelling in hours with over a minute of delay has increased to 7%; and the latent demand factor (for the full data set) has also increased to 1.05. These changes are typical for the current national situation with reduced levels of service at hours when drivers prefer (and no longer need) not to operate.

7.21 The overall value of ISUD (including all ranks) was zero in 2014, rose to 0.12 in 2017 and is 10.53 now. This level is far from being significant in terms of the industry standard evaluation that takes the value of 80 as a cut-off determining unmet demand as being significant, but it remains a strong change compared to previous values. Further discussion regarding this occurs in the synthesis section below taking this in overall context.

8 Disability user survey

8.1 For this survey an additional on-line questionnaire was provided for the Council to circulate to all those as part of its equalities assessment duty. it is aware may need adapted licensed vehicles of any form. It is accepted that this is not perhaps the most inclusive or preferable way to undertake a full review of accessibility of the licensed vehicle fleet but it is a relatively direct and cost-effective test allowing some response to be provided. We have found the responses useful and illustrating in recent surveys.

8.2 There were just four responses received from an identified Disability Forum. The questionnaire was open from early November 2022 to mid-December 2022. With reminders sent via Council representatives to encourage completion. The latest response was received in mid-November 2022. This level of response can only be taken as indicative and shows need for further thought on how this could be increased in future.

8.3 The responses included one regular hackney carriage user, two rare users and one that never used a hackney carriage.

8.4 In terms of conditions for those responding, three had mobility issues, two had hearing impairments, with one person vision, one mental health, one communication and one long standing health issues – suggesting a wide range of need just across three people. Two needed to use a wheelchair all of the time. Two needed hearing aids and two a carer at all times when travelling One used sight aids and one used walking sticks or crutches.

8.5 Of the three, one needed a WAV, one did not and another would transfer with assistance from the driver. Two said taxi drivers usually went above and beyond to assist them travelling whilst one said they did not feel they understood their travel needs.

8.6 Two felt there were too few WAV's to meet demand whilst one said there were more than enough. Three felt more private hire WAVs were needed.

8.7 If a hackney carriage was not available when needed, one would phone for a private hire, one would wait, another would seek family help and another would choose to use whatever vehicle was available even if it meant they needed more assistance to use it.

8.8 Three of the four respondents said disability awareness training was needed for both drivers and operators. Two supported revoking of licences for anyone found to actively discriminate. 50% felt service was satisfactory, 25% good and 25% excellent (hackney carriage) with 50% and 25% for private hire but 25% saying private hire service was bad.

8.9 Although this response is only a small number, and there were only three even occasional users represented, a varied picture is provided of good and bad service. The slight majority view was need for more WAV style vehicles, but there was a strong view that training of both drivers and operators would be of benefit.It should be noted that WAV training and disability awareness training is already a compulsory requirement for new applicants and this will be extended to all drivers in the near future before operating a WAV.

9 Views about limit policies

9.1 The present DfT Best Practice Guidance still current from April 2010 states in paragraph 47 "Most local licensing authorities do not impose quantity restrictions; the Department regards that as best practice". This statement is restated in the new Best Practice Guidance still under consultation in para 9.4. However, there is also a strong cohort of authorities where the limit policy is retained and believed to be important.

9.2 At the present time our review of the March 2022 DfT statistics Table 0108 shows there were 281 licensing authorities, with some about to be merged to become unitary authorities . At March 2022 there were 73 (26%) of authorities with a limit, 8 (3%) with limits in some parts of the authority, 2 (1%) with limits for some vehicle types, 3 (1%) unknown and 195 (69%) without quantity limits. This was very similar to the overall 28% quoted as being limited in 2014 (88 authorities of the 313 existing then (Law Commission Report para 11.3 footnote 5).

9.3 Since that date, several authorities have removed their limits and several others have returned limits. Recent known removals include Scarborough and Aylesbury (resulting from moves to unitary authorities) and Barrow in Furness. Additions include East Hertfordshire.

9.4 Two authorities have tested if they have unmet demand and then determined not to return any limit (Warwick and Cheshire West).

9.5 There have been a number of encouragements for authorities to remove limits and plans to outlaw them. None have been entirely successful although the current move towards unitary authorities is presently leading to many new authorities choosing a single licensing authority for the new area which leads to removal of limits in any constituent areas, often with minimal consultation on that specific element. A most recent example is the new Buckinghamshire, with the new Yorkshire combined authority following suit.

9.6 The best recent open review of the benefits and disbenefits of limits was undertaken by the Law Commission and published in May 2014. The initial proposal was that limits should be made illegal by revoking the 1985 Transport Act Section 16 in full. Their suggestion was application of appropriate quality controls rather than quantity restriction. The proposal received around 1,500 responses most of which opposed the removal of quantity restrictions.

9.7 The key to opposing quantity restrictions by the Law Commission was that economic literature is generally hostile to these. The economic arguments are that the free market is the best means of determining the necessary level of taxi provision, that unmet demand surveys may not be capable of registering true levels of demand patent and latent and that they might have negative effects on passenger waiting times and fares. Finally, the economic case suggests quantity control is a blunt instrument for controlling entry.

9.8 The counter response was that economic models, albeit diverse and sophisticated, are not reliable in predicting the effect of actually removing such controls. The explanation suggested is that particular features of this highly regulated market distort the normal effects of competitive forces. The classic example quoted for this is New York where limits were returned on the basis that the market was not capable of working properly to provide a proper level of supply.

9.9 Compared to the arguments for removing limits, which are generally initially obvious that more vehicles means more choice for customers, the arguments against are much more complex.

9.10 It is true that a limit makes it hard or usually impossible for any current driver in the trade without their own vehicle to obtain one – i.e. a protected market for current vehicle owners. However, it is also true that many drivers choose not to own a vehicle for a range of reasons, principally the cost of ownership and maintenance.

9.11 The Law Commission report (Taxi and Private Hire Services, May 2014) firstly points out the impact of increasing vehicle numbers on driver income in a period when demand was generally level or reducing for vehicles servicing ranks. This also had public impacts in terms of increased congestion, air and noise pollution, not just from more vehicles, but from more vehicles circulating more to obtain trade.

9.12 Concerns were raised that derestricted markets could see reduced ability of drivers to maintain vehicles or to invest in new ones. This has become more important recently with reference to potential need to invest in more sustainable fleets. The hackney carriage market also tends to be more provided by individuals rather than companies focussing the need for personal investment rather than company investment.

9.13 A further result of having more vehicles in the hackney carriage market tends to be that drivers will work to an expected income. Their principal way of ensuring that would be to increase hours as need occurred, leading to the potential for drivers working too long hours to the detriment of their health and that of their passengers.This is referred to in the Crawley Borough Council

Hackney Carriage and Private Hire Licensing Policy (2022) but remains the responsibility of the driver themselves.

9.14 Our recent reviews of areas with and without limits has provided further evidence that the hackney carriage market does not work normally. Most people would believe that reductions in demand with the same level of vehicles permitted would decrease unmet demand levels. We have not found this to be the case. Many areas have seen strong reduction in demand, even now that the pandemic impacts have generally been diluted, but have still seen levels of unmet demand increase. We would also suggest that there could well be authorities without limits where unmet demand exists. When many authorities were undertaking air quality reviews, there was a warning in each report that strictures on vehicle types could lead to unmet demand from the suppression of the number of vehicles.

9.15 This is principally because of churn in the overall demand and supply markets. Initially the pandemic saw the cessation of most rank operations. However, as time moved on, ranks began to return to use whilst many private hire operations continued to see adverse impacts as their markets remained closed – e.g. airports, rail stations. Being company-based, private hire companies have tended to agglomerate and focus their supply on key markets. This has led to many no longer providing 24/7 service or being willing to over-staff to allow for variation in demand. This has generally increased demand for rank-based services.

9.16 Further, those operating hackney carriages tend to be an amalgam of a large number of individuals all making personal and different decisions about when they provide services to the public. Many are now finding themselves able to earn the living they choose without operating at times that customers can be more difficult and general situations less safe, i.e. nights and weekends. This reduces supply from the same level of vehicles leading to the unmet demand increases. This is worsened where some have chosen to leave the industry.

9.17 Another key argument for limits is the overall stability this implies to the trade remaining.

9.18 It also has led to an encouragement for drivers to share vehicles, (as “jourmeymen” in Crawley, nationally terms differ, e.g. “jockeys” in Liverpool) which maximises the hours a vehicle is available to the public whilst minimising the number of vehicles that can be out at any time. The counter concern of removing limits has been that it may simply duplicate service at times people prefer to meet demand rather than at times when vehicles are needed (see below).

9.19 In pure economic theory the market between supply and demand is expected to find its own level. Whilst this usually proves true, the key issue is the length of time this can take to occur. It is certainly not instantaneous and some trade representatives (e.g. Liverpool) has suggested the balance time may be years rather than months.

9.20 The Law Commission report (Taxi and Private Hire Services, May 2014) para 11.34 also noted that retaining restrictions might have enforcement cost benefits. Not only would the number of vehicles to review be kept at a level, but the threat of losing a licence with a potential value might well encourage better compliance from licence holders.

9.21 Other valid points included that simple removal of quantity control can not guarantee provision of supply at all times of high demand. As a balance, nor could increased fares have a similar effect.

9.22 The Law Commission report (Taxi and Private Hire Services, May 2014) concluded "evidence from consultation suggests that we cannot be confident that removing quantity restrictions would bring significant consumer benefits". (Para 11.60).

10 Summary and synthesis

10.1 This Unmet demand survey 2022 on behalf of Crawley Borough Council has been undertaken following the guidance of the Department for Transport Best Practice Guidance and other recent case history regarding unmet demand and its significance. It has been undertaken using the current status of law and practice as at the end of December 2022.

Background and context

10.2 This survey is the latest in a regular set of reviews of the status of unmet demand within the Borough. It was undertaken between August and December 2022, with video rank observations in November, an all-trade driver survey in October and November, on-street pedestrian interviews in November and December and key stakeholder consultation throughout the period.

10.3 The Taxi Licensing Service works closely with other parts of the Council and with the transport / highway authority West Sussex County Council.

10.4 Hackney carriage vehicle numbers have been fixed at 123 since 2011. This was after a period of no limit and growth from 79 vehicles in 2007. Private hire vehicles have always been a much larger contingent in the authority due to the presence of Gatwick Airport and current numbers are very similar to the level of 660 from the early 2000's and less than the peak reached about the time of the last survey.

10.5 The private hire fleet (and both kinds of driver) saw strong number reductions during the pandemic but statistics suggest most are now back in place.

10.6 The level of wheel chair accessible vehicles in the hackney carriage fleet has remained stable at 19% over recent years. However, statistics show a reduction in the private hire fleet proportion.

10.7 The limit has regularly been reviewed although the present survey was delayed by the previous survey date being at the start of the pandemic.

Rank observations

10.8 The principal change in ranks since the last survey resulted from the closure of the main night club in the area, leading to reduced use of that rank (Station Way, Crawley).

10.9 The change to the rank at Three Bridges Railway Station remains, as well as the redesign of Crawley Railway Station and something that will evolve in the future. This means the data from this survey could be used to inform design of any revised facility there.

10.10 Estimated weekly passenger demand from ranks has reduced by 18% since the last survey.

10.11 The proportion of the total passengers at Three Bridges Railway Station has increased to 84% in this survey from 73% in 2017. This is even though the actual level of estimated weekly demand is down 6% from 2017. The main other rank in the Crawley licensing area is now Haslett Avenue West, with an estimated 7% of passengers, a strong increase from 2017. Both the Boulevard and the High Street (Jubilee Oak) ranks have lost patronage and share. The High Street (Hive Bar) location, a part time rank sees a little use although strongly hampered by private vehicles abusing the location.

10.12 For this survey, Thursday and Friday flows are similar, with a stronger peak on Saturday. Average passengers per hour are low – 29 on Thursdays, 31 on Fridays and 41 on Saturdays. However, demand for hackney carriages at ranks covers all hours that were observed, with no zero flow hours observed from Thursday through to Sunday morning.

10.13 The flip side is there are only two hours when passenger flows in any hour are over 100, both at the Saturday night / Sunday morning peak hour.

10.14 In this survey only one person was observed using a rank in a wheel chair – at Haslett Avenue West. Others were observed needing assistance with most at the Boulevard followed by Haslett Avenue West.

10.15 There appears to be a high level of concentration of the wheel chair vehicles in the fleet active at ranks. However, this focus may relate more to the high capacity benefit of these rather than service to customers in wheel chairs as both the Boulevard and Haslett Avenue West saw the lowest level of wheel chair accessible style vehicles despite their having the highest observed demand.

10.16 Although 80% of vehicle movements at ranks were hackney carriage vehicles the Boulevard, High Street (Jubilee Oak) and High Street (Hive Bar) saw most private vehicle abuse, with the latter two having the most significant and safety critical levels of such usage. Action is needed at these two night locations.

10.17 The sample plate observations suggested a strong reduction in the number of vehicles active with the overall value seeing a third of the plates compared to 59% in 2017. The busiest period at Three Bridges Railway Station rank saw 20% of available plates now compared to 41% in 2017.

10.18 Review of delays encountered found these were small overall. The worst wait by any person was just under 16 minutes and the worst average passenger delay in any hour just over 4 minutes. Just 9% of surveyed hours and 4% of observed passengers saw delay. Even those that waited saw 82% of their waits five minutes or less.

On street public views

10.19 188 on-street interviews were undertaken with people across the area, covering the main centres of Crawley and Three Bridges Railway Station. In this survey, a high 87% said they had made on or more trips by licensed vehicle in the area in the last three months. This split to 44% by hackney carriage only, 11% both kinds of vehicle and 32% private hire only.

10.20 Top reason for not using a hackney carriage was a preference by people for vehicles to come to where they were.

10.21 Estimated overall licensed vehicle usage at 3.8 trips per person per month was a strong increase on the one trip in 2017. 54% of people said they got hackney carriages at a rank, 40% phoned and 5% used an app.

10.22 There was a strong reduction in the level of people saying they could not remember when they last used a hackney carriage (from 82% in 2017 to 29% now), and this element of the questions suggested 59% of licensed vehicle usage was hackney carriage.

10.23 There were slightly more private hire operators named in this survey, with an app company now in fourth equal place (having not been mentioned in 2017). The top company in 2022 had been third in 2017 and now saw 34% of mentions. There was evidence of strong competition between the companies, often a negative impact on hackney carriage usage, but apparently not so for Crawley.

10.24 People most knew the Three Bridges Railway Station rank (39%) followed by Haslett Avenue West (28%). An anomaly was that 24% said they were aware of a rank at Crawley Railway Station.

10.25 Overall, people felt that the service provided by licensed vehicles in Crawley Borough is 'very good' with driver knowledge marginally the best performing area.

10.26 The level of need for wheel chair accessible vehicles was about the same, but the focus now was on need for wheel chair accessible styles rather than any other adaptations.

10.27 There was no latent demand found at Three Bridges Railway Station but a small amount in Crawley town centre. The factor increased from 2017's zero level to 1.05 for this time.

10.28 Questions about changes from before COVID to now and to the future did not provide any clear guidance on how peoples' usage of either kind of vehicle would change.

Key stakeholder views

10.29 The small key stakeholder response (but larger than in many of our recent studies) found issues suggesting hackney carriage operations had reduced the number of people willing to go out at night, mainly due to charging higher fares at weekends.

Trade views

10.30 The all-driver survey received 63 responses compared to 85 last time, but a higher level (79% compared to 61%) from hackney carriages. Days and hours worked quoted were very similar to 2017.

10.31 56% of the hackney carriages told us they only obtained work from ranks. A further 31% got work from ranks and school contracts. There was no clear reason why people worked when they did, but the focus was on working around family commitments.

10.32 97% stated they supported retention of the limit, including most of the private hire respondents, but gave no specific reasons why. However, in other questions the focus was there being sufficient vehicles to meet current demand and a strong fear of the implication of any new hackney carriages being added to the fleet.

Formal evaluation of significance of unmet demand

10.33 Apart from the peakiness factor and the seasonal factor which both remained as in 2017, all elements of the index of significance of unmet demand increased, i.e. suggesting poorer service to the ranks now. The worst increase was general incidence of delay, i.e. the number of passengers travelling in hours when the average passenger delay in that hour was greater than a minute had increased.

10.34 However, the overall index remains well below the accepted cut-off that defines the level of unmet demand as significant (10.53 compared to 80). This means the overall view is there is sufficient numbers of vehicles at the present time to allow retention of the limit, and at its current level.

Disability user survey

10.35 This new element to the survey received a small response, but principally suggested those with disability felt more vehicles were needed, but with a focus on more in the private hire fleet. There was also a suggestion that more training was required.

Synthesis

10.36 Licensed vehicle operations in Crawley at this point in time seem to be generally very healthy, with very good levels of customer satisfaction. People seem to suggest their usage of hackney carriages has increased although the overall level is actually 18% down from 2017. The central Crawley ranks have suffered most from reductions apart from Haslett Avenue West, but the share taken by the Three Bridges Railway Station rank has increased strongly. This is despite reduced passenger flows there (the actual value of passenger numbers is actually just 6% down from 2017 levels).

10.37 Although the drivers responding suggest they are working about the same hours and days as in 2017, the sample plate survey suggests less vehicles are active by a significant amount. The result of this is a deterioration in the overall service level to the ranks, demonstrated by the industry standard index of significance of unmet demand increasing. However, its level remains well below that which would suggest either that the limit should be removed or any further vehicles added to the fleet at this time.

10.38 There is evidence that consideration needs to be given to encouraging better service to the night operations in Crawley town centre. This would need strong enforcement against abuse of ranks by private cars but also may need changes by the trade in the way they service these locations (given the negative comments on fare levels and operational issues by stakeholders). The reduced demand observed matches the comments from key stakeholders that think there are less people coming out mainly due to concern over prices of hackney carriages at night. This needs more consideration.

10.39 Both the rank observations and the formal estimate of unmet demand confirm there is unmet demand, but at a low level. Whilst the bulk of this is at Three Bridges Railway Station rank there is also passenger delay at both Haslett Avenue West and The Boulevard and the focus of the delays appears to be daytime on Fridays.

10.40 There does appear to be some public misunderstanding about the operation at Crawley Railway Station which seems to be counted as an active rank by many passengers.

10.41 The key stakeholder reference to concern about fares varying may reflect reporting of Uber surge pricing occurrences although it did reference higher hackney carriage fare rates.

10.42 It does appear that there has been an increasing focus of demand at Three Bridges Railway Station. From the passenger side this could be those wanting night life returning from other locations that still have night clubs. From the driver side, there seems to be an increasing preference for servicing rail demand which even late at night tends to see less disruptive passengers given that they will have travelled already before entering a vehicle, whereas those nearer to pubs and clubs may have directly entered the vehicle from cessation of their drinking sessions.

10.43 The latest rail statistics of station patronage estimates (period ending March 2022) show present Three Bridges Railway Station flows at 2.2m entries and exits per year. This is 69% of the value for the year pre-pandemic and 72% of the level at the time of the last survey in 2017. The first year after the pandemic saw patronage there fall by 76%, but this latest year saw 184% growth.

10.44 If the estimated weekly hackney carriage passengers from the rank are compared to the estimated weekly station exits, currently 20% of passengers leave Three Bridges Railway Station in a hackney carriage. In 2017 this value was 15%.

10.45 It is also clear that there has been an overall reduction of the number of hackney carriages servicing ranks with more take-up of schools and other contracts which became essential during the lock-downs.

10.46 The principal negative impacts of the pandemic on the industry have been many drivers re-evaluating their life values and focussing on preferable hours of working or other careers such as deliveries and the increasing trend for private car owners having seen empty ranks in the height of the pandemic now consider them suitable places to park.

10.47 It must also be remembered that many reports of shortages of 'taxis' at the present time relate to a lack of drivers and vehicles on private hire booking circuits, which is not related to the issue of hackney carriages or limits on their numbers. This implies that at the present time the market for private hire bookings is not being met by drivers willing to join the private hire trade.

10.48 Often, when limits are removed, the transfer to hackney carriage plates tends to be from those that have either driven private hire vehicles, or from those who currently drive vehicles they rent rather than own.

10.49 Whilst there can sometimes be increases in overall vehicle numbers the more normal change is retention of a similar number of vehicles in total, but a tip in share towards hackney carriage numbers increasing whilst private hire reduce. If new hackney carriages came from private hire and chose to work on their own account, this could worsen issues with private hire booking shortages. However, it may also lead to need for extra ranks and loss of some established hackney carriage owner-drivers unable to maintain their living but possibly more activity from those that used to rent but now own.

11 Study Conclusions

11.1 On the basis of the evidence gathered in this Unmet demand survey 2022 for Crawley Borough Council, our key conclusion is that there is no evidence of any unmet demand for the services of hackney carriages either patent or latent which is significant at this point in time in the Crawley Borough Council licensing area. The limit appears to benefit the public interest overall.

11.2 This allows the committee legitimately to retain the limit on vehicle numbers, and to do so at the present level if it so wishes. Further, this decision could be defended if challenged.

11.3 Department for Transport Best Practice Guidance – both the 2010 current and the (unknown) update both encourage a new survey within a three-year timeline if the limit is retained.

11.4 The present limit on vehicle numbers continues to provide benefit to the public in terms of stability and very good service. Only low levels of passengers experienced any waiting for vehicles to arrive.

11.5 There is need for support and development of the night service to ranks in Crawley town centre This needs strong enforcement against abuse by private cars, but there is also need for the hackney carriage trade to consider its operation to focus towards customer need. This may mean some drivers have to choose to work less preferential hours to ensure the totality of public demand for their service is met at all times.

11.6 There is need to consider further and develop the accessibility of the entire fleet to those with need for vehicle adaptations.

11.7 Were the limit to be removed, consideration should be given to how the success or otherwise of this change would be measured clearly.

11.8 Further, the committee would need to agree any requirements of new plates being issued, such as if these would be restricted to any particular general design of vehicle, e.g. WAV, sustainable style or other quality aspects that might be considered appropriate.

		The Boulevard	Haslett Avenue West, Bus Stn	High Street, Jubilee Oak	High St, Hive Bar	Ifield Road	Crawley Station	Three Bridges Station	Hours
Rank Spaces		6	?	5		4	3 sp general, 6 sp Crawley Cars	app 15	
Operating Hours		24 hr	24 hr	24 hr	2200-0600		24 hr	24 hr	
Council List?		Y	Y	Y			Y	Y	
Comments							Private - rail operator, moved since last to Car park, ph booking office here last train arr 0043 next 0606	Station Taxis has office on station forecourt Trains run all night	
Thursday	06:00							A	1
Thursday	07:00							A	1
Thursday	08:00					U	B	A	3
Thursday	09:00					U	B	A	3
Thursday	10:00	A	A			U	B	A	5
Thursday	11:00	A	A			U	B	A	5
Thursday	12:00	A	A			U	B	A	5
Thursday	13:00	A	A			U	B	A	5
Thursday	14:00	A	A			U	B	A	5
Thursday	15:00	A	A			U	B	A	5
Thursday	16:00	A	A			U	B	A	5
Thursday	17:00	A	A			U	B	A	5
Thursday	18:00	A				U	B	A	4
Thursday	19:00	A		A		U	B	A	5
Thursday	20:00	A		A		U	B	A	5
Thursday	21:00	A		A		U	B	A	5
Thursday	22:00	A		A	P	U	B	A	6
Thursday	23:00			A	P	U	B	A	5
Thursday	00:00				P	U	B	A	4
Friday	01:00				P	U	B	A	4
Friday	02:00				P	U	B	A	4
Friday	03:00				A	U	B	A	4
Friday	04:00				U	U	B	A	4
Friday	05:00				U	U	B	A	4
Friday	06:00				U	U	B	A	4
Friday	07:00				U	U	B	A	4
Friday	08:00				U	U	B	A	4
Friday	09:00				U	U	B	A	4
Friday	10:00	A	A		L	U	B	A	6
Friday	11:00	A	A		L	U	B	A	6
Friday	12:00	A	A		L	U	B	A	6
Friday	13:00	A	A		L	U	B	A	6
Friday	14:00	A	A		L	U	B	A	6
Friday	15:00	A	A		L	U	B	A	6
Friday	16:00	A	A		L	U	B	A	6
Friday	17:00	A	A		L	U	B	A	6
Friday	18:00	A	A		P	U	B	A	6
Friday	19:00	A	A	A	P	U	B	A	7
Friday	20:00	A		A	P	U	B	A	6
Friday	21:00	A		A	P	U	B	A	6
Friday	22:00	A		A	P	U	B	A	6
Friday	23:00	A		A	P	U	B	A	6
Friday	00:00			A	P	U	B	A	5
Saturday	01:00			A	A	U	B	A	5
Saturday	02:00			A	A	U	B	A	5
Saturday	03:00				A	U	B	A	4
Saturday	04:00				U	U	B	A	4
Saturday	05:00				U	U	B	A	4
Saturday	06:00				U	U	B	A	4
Saturday	07:00				U	U	B	A	4
Saturday	08:00		A		U	U	B	A	5
Saturday	09:00	A	A		U	U	B	A	6
Saturday	10:00	A	A		L	U	B	A	6
Saturday	11:00	A	A		L	U	B	A	6
Saturday	12:00	A	A		L	U	B	A	6
Saturday	13:00	A	A		L	U	B	A	6
Saturday	14:00	A	A		L	U	B	A	6
Saturday	15:00	A	A		L	U	B	A	6
Saturday	16:00	A	A		L	U	B	A	6
Saturday	17:00	A	A		L	U	B	A	6
Saturday	18:00	A	A		P	U	B	A	6
Saturday	19:00	A	A	A	P	U	B	A	7
Saturday	20:00	A	A	A	P	U	B	A	7
Saturday	21:00	A	A	A	P	U	B	A	7
Saturday	22:00	A	A	A	P	U	B	A	7
Saturday	23:00	A		A	P	U	B	A	6
Saturday	00:00			A	A	U	B	A	5
Sunday	01:00			A	P	U	B	A	5
Sunday	02:00			A	P	U	B	A	5
Sunday	03:00			A	P	U	B	A	5
Sunday	04:00			A	U	U	B	A	5
Sunday	05:00			A	U	U	B	A	5
Sunday	06:00						B	A	2
									369
Total hours at site		*42*	*33*	*24*	*56*	*70*	*71*	*73*	***369***

KEY:	
U	Unused
P	parked in
L	loading
A	active as rank
B	bookings only