West Suffolk Council

Hackney carriage demand survey

January 2020

Executive Summary

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

The aim of this survey was to provide a database of information on which various policy decisions could be made. A test was required if there was unmet demand which was significant in either area. The industry standard test found that though, as in most places, there was unmet demand, this was far from significant in zone A and a little larger in zone B, but still a long way from a level at which this could be counted significant. Further, an element of the unmet demand in zone B related to the private rank at the station. When the two zones were put together, the resulting ISUD value remained well below the level that could be counted significant.

Whilst this provides the option of limiting vehicle numbers in either or both zones, or an agglomerated area, it was not considered prudent that this extend to setting any limit lower than the current level of vehicles either in the two zones or if the two areas were put together.

Considering the two zones separately, there are clear differences between the two zones and how both hackney carriages and private hire operate within them. However, there are more notable differences between the settlements within each zone than there are between the zones. In some respects there are also remarkable similarities between the two zones. There is only very marginal evidence that combining the zones will lead to any major transfer of hackney carriages between one zone and the other and on balance from a demand point of view combination of the two zones seems sensible.

However, this should be undertaken over time given that there are significant differences in policy and operation which need to be resolved. One key element is the livery policy which applies to zone A but not zone B. Much more robust discussion needs to occur with both trade and public in this respect, with a focus on providing a strong corporate decision which will unite the two former areas rather than providing any element of division.

A much more important matter from customer service points of view is resolving how greater and better service can be provided for those needing wheel chair accessible vehicles to enable them to live as normal lives as possible in a licensed vehicle manner. Although the current levels appear to mirror stated need somewhat, the very slow take-up of such vehicle types in zone A needs to be addressed. This may need working days between the council, trade and users and should also consider aspects of improved environmental sensitivity of vehicle types at the same time to ensure no conflict between these two very current topics.

One potential benefit of an authority wide limit on hackney carriage vehicle numbers could be giving greater value to vehicles but only as long as this was transferred at least partly to investment in wheel chair and more environmentally friendly vehicle types. The quit pro quo of either applying a limit or any other policy changes affecting vehicles must include phased extinction of the grandfather rights inasmuch as they hinder improvements to customer service overall.

Another key focus must be some attempt to encourage greater corporate trade involvement as well as providing opportunities for the public and key stakeholders to continue and develop inputs to the future of licensed vehicles in the area.

Contents

1 General introduction and background

West Suffolk Council is responsible for the licensing of hackney carriage and private hire vehicles operating within the Council area and is the licensing authority for this complete area. Further details of the local application of Section 16 of the 1985 Transport Act with regard to limiting hackney carriage vehicle numbers is provided in further Chapters of this report. Hackney carriage vehicle licences are the only part of licensing where such a stipulation occurs and there is no legal means by which either private hire vehicle numbers, private hire or hackney carriage driver numbers, or the number of private hire operators can be limited.

The Council was created on 1st April 2019 by the merger of Forest Heath and St Edmundsbury (see further information below) and whilst the overall study follows the format of a review of unmet demand, the actual brief is wider and involves considering a range of issues, including the issue of zoning and differences between area policy.

This review of current policy is based on the Best Practice Guidance produced by the Department for Transport in April 2010 (BPG). It seeks to provide information to the licensing authority to meet section 16 of the Transport Act 1985 "that the grant of a hackney carriage vehicle licence may be refused if, but only if, the licensing authority is satisfied that there is no significant demand for the services of hackney carriages within its local area, which is unmet." This terminology is typically shortened to "no SUD".

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

As already stated, other groups have provided comments giving their views about licensing matters but the upshot remains no change in legislation from that already stated above.

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

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

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

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

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

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

A further pertinent matter to this particular report is the issue of zoning. Where authorities merge, the option exists for hackney carriage operations to operate in zones that mirror the former authority areas. This can be undertaken to ensure that different characteristics and policies in what were separate areas can be continued. This option is not possible with private hire services, which must be amalgamated. However, the choice with zoning is very stark. The choice is either to keep the zoning or not. No other option is available, and once the zones are removed they cannot be returned. The Law Commission Review considered this issue and recommended that the option to introduce and change zones be considered, but with this review now effectively superceded, there are no present options being considered to allow more flexibility re zones.

The only place where any similar leeway is being considered is in Scotland where the ability of an authority to limit private hire vehicles also allows this to be focussed on an area within an authority as well as pan authority. However, there is no present plan to extend or copy the Scottish legislation to the English jurisdiction, although thoughts about limiting private hire vehicle numbers were part of the recent All Party Parliamentary Group review, although that issue was one on which there was significant disagreement between parties involved.

Although many authorities have amalgamated over the years, there is no common body of research that summarises how keeping or removing zoning has benefitted the consumer or otherwise. Many authorities, including Durham and most recently Shropshire, have removed zones, whereas many others, including some long historic examples such as Wakefield, that retains a very complex and extensive zoning system, and Cornwall, retain zones and retain active differences between the zones, principally but not exclusively the retention of limits on vehicle numbers.

The understanding re zoning presented above mirrors that already presented to the authority in their July 2018 document considering the zoning issue, with the key point being that a decision regarding zones is critical mainly because once made, without legislative change, they cannot be restored. Also, the main negative impact, of vehicles being attracted to a main centre, was demonstrated in the Durham experience, but as far as we are aware was not repeated with other dezoning such as in Shropshire, although this did take place over a much longer period and after much more consideration.

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

2 Local background and context

Key dates for this Hackney carriage demand survey for West Suffolk Council are:

- appointed Licensed Vehicle Surveys and Assessment (LVSA) on 29th May 2019
- in accordance with our proposal of May 2019
- as confirmed during the inception meeting for the survey held on 5th June 2019
- this survey was carried out between June and September 2019
- On street pedestrian survey work occurred in July, August and September 2019
- the video rank observations occurred in early June 2019
- Licensed vehicle driver opinions and operating practices were canvassed using an all-driver survey available through July and August 2019
- Key stakeholders were consulted throughout the period of the survey
- A draft of this Final Report was reviewed by the client during September 2019
- and reported to the appropriate Council committee following acceptance of the Final report.

West Suffolk Council replaced Forest Heath District Council and St Edmundsbury Borough Council on 1st April 2019. It entirely replaces those two councils although some functions remain with a much smaller auxiliary authority (e.g. school transport). The two councils had a joint Chief Executive since 2011 and work towards the new authority had been undertaken by the shadow authority in advance of the full merger.

As part of the preparation for the merger of the taxi licensing functions of the predecessor authorities, an interim joint Taxi Policy Handbook was produced in February 2019. An evidence base is currently under development to provide a wider policy review in 2020. This involved a commitment to undertake a survey of supply and demand for hackney carriages in the new authority area.

The present organisation sees the new authority split into two licensing areas:

A – Forest Heath former area

B – St Edmundsbury former area

Hackney carriage vehicles can be licensed to operate in either of these two zones, but not both. Private hire can only be licensed for the full area. In terms of limiting hackney carriage vehicle numbers, neither predecessor authority had a limit at the time of the merger. Further detail of the previous policies in this regard are provided in further chapters.

The survey brief covers both demand for hackney carriages and also their accessibility. In detail:

"to establish the following:

1. Number of Hackney Carriages licensed by West Suffolk Council

i) Is there any significant demand in either of the two West Suffolk Licensing Zones A and B for the services of Hackney Carriages that is unmet by the existing Hackney Carriage fleet?

ii) If there is no such significant demand, could a fewer number of Hackney Carriages than those currently licensed meet the existing demand for the services of Hackney Carriages within West Suffolk?

iii) If so, what is the minimum number of Hackney Carriages that could be licensed by West Suffolk Council that could meet the demand for the services of Hackney Carriages within West Suffolk?

2. Accessibility of the Hackney Carriages licensed by West Suffolk Council

i) Are the existing Hackney Carriages accessible to all persons who may wish to use them?

ii) Are saloon vehicles more accessible than wheelchair accessible vehicles?

iii) If so, why are they more accessible?

iv) Are wheelchair users able to use the services of the existing Hackney Carriage fleet?"

This Report provides the evidence data base required for the future overall policy review, but focussed on the two aspects above. As already noted, the most expedient way to provide this base is to undertake the elements of a standard 'unmet demand' style survey and supplement other elements within this.

The authority has a current population of 179,727 using the 2019 estimates currently available from the 2011 census. 64% of this population was in Zone B, the former St Edmundsbury area. The Suffolk Observatory confirms this value, quoting 179,800 for the 2016-based projected population total for West Suffolk for 2019. This is projected to rise to 181,800 by 2021 and 186,200 by 2026, with values then available for every five years to 2041. This is a 1% growth in the next two years, and just 3.6% in the next seven, levels that will not provide any significant pressure on licensed vehicle numbers per se. Further discussion of how this population is split between gender and broad age groups occurs in the section reviewing the on street interview surveys.

Limitation Policies

For the sake of historical record, the LVSA database of demand surveys was interrogated to identify any information regarding previous policy and surveys of demand for either of the constituent areas of West Suffolk.

The most recent survey in the area was undertaken for St Edmundsbury, reporting in March 2008 and resulting in removal of the limit on hackney carriage vehicle numbers there. Unmet demand that was significant was identified, with the cut-off value of 80 being slightly exceeded at the level of 84, mainly due to nearly a third of passengers travelling in hours when there was average passenger delay of over a minute. The record suggests this instigated a WAV only new vehicle policy alongside proposals for a livery. DfT statistics suggest the limit had been put in place in 1987.

Surveys for Forest Heath were identified for 2003, where no evidence of any unmet demand that was significant was identified, and in 1997 when the value was marginally higher at 1, but still far from significant.

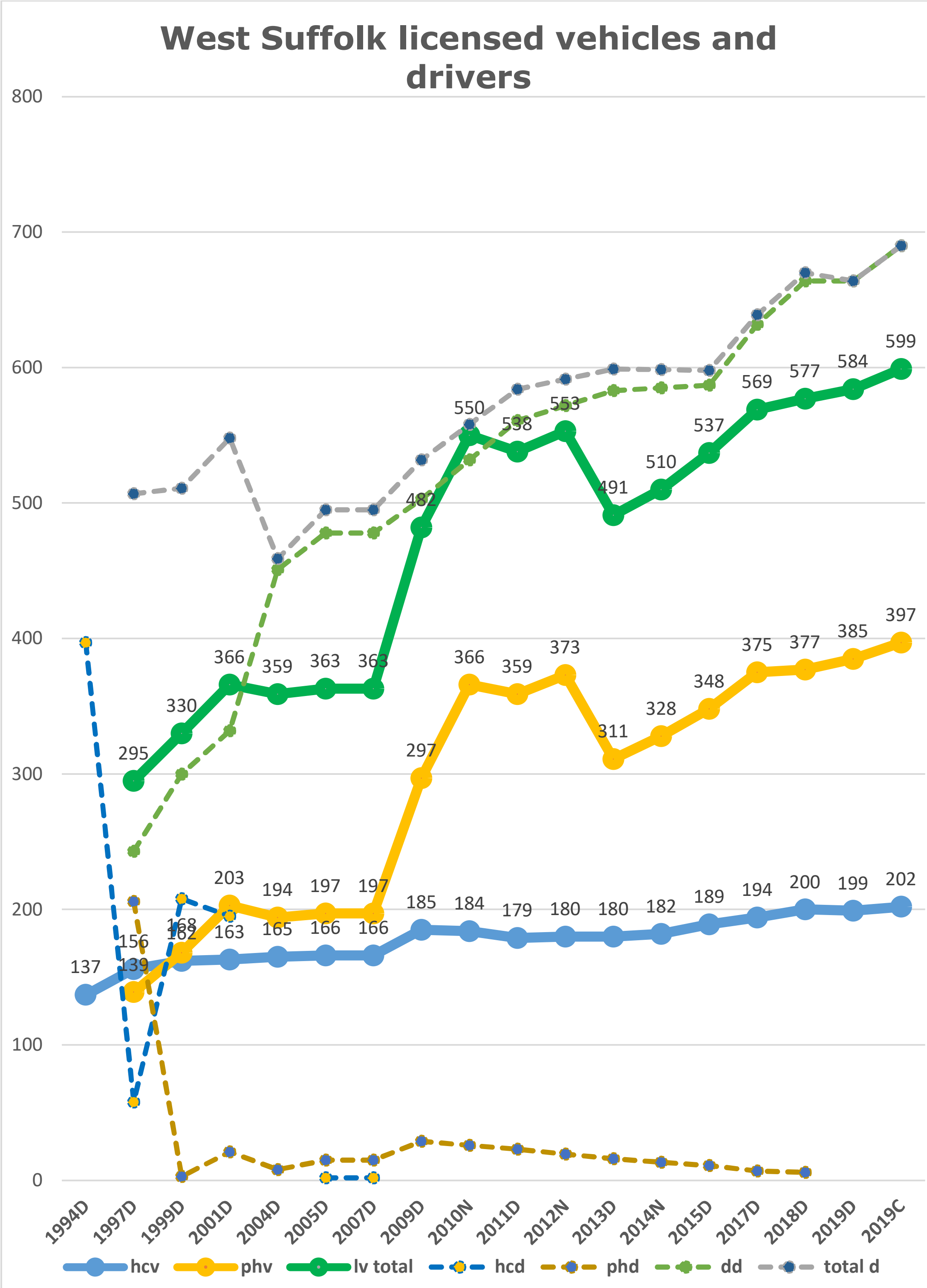
Further information from both surveys, where available, is presented where this is relevant through the remaining report.

Fleet statistics

By drawing together published statistics from both the Department for Transport (D) and the National Private Hire Association (N), supplemented by private information from the licensing authority records (C), recent trends in vehicle, driver and operator numbers can be observed. The 'D' surveys occurred in outline in 1994 (hackney carriage only), 1997, 1999, 2001, 2004, 2005 and then every two years to 2017, then annually since; whilst the 'N' records supplemented the 'even' years 2010, 2012 and 2014 to provide an annual record almost until the DfT chose to make their review annual. The only year missing from this annual series is therefore 2016. Recent figures record numbers at the end of March in the year stated though dates up to 2001 were at 31st December in the year quoted. 'C' values are usually provided at the date of the rank work (in this case for June 2019).

The detailed numbers supporting the picture below are provided in Appendix 1. Due to the comparative size, the operator figures are shown in the second picture. In the key to each diagram, the abbreviations are used as follows:

Hc = hackney carriage
Ph = private hire
L= Licensed (i.e. both hackney carriage and private hire)
D= Dual (i.e. applies to both hackney carriage and private hire)
V= vehicles
D= drivers
Ops= operators



Licensing Statistics from 1994 to date, West Suffolk total

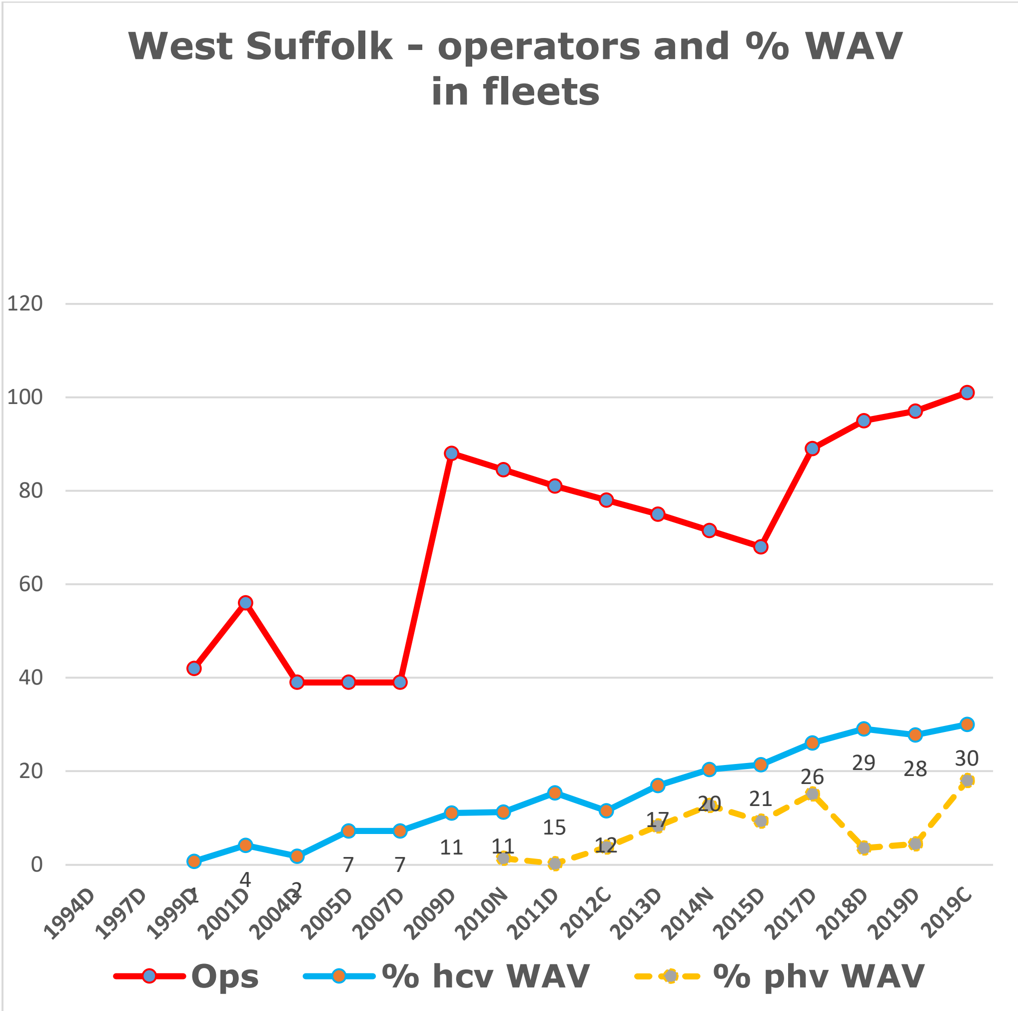
(see bottom of p11 for explanation of abbreviations)

For West Suffolk, both hackney carriage and private hire vehicles have shown steady levels of numeric growth over most of the time for which statistics are available, with a marginal reduction of hackney carriage around 2011 and a more marked reduction in private hire numbers around 2013/2014. However, for both fleets the current level of vehicles is presently the highest it has been since statistics began. Since 1997, total growth has been 29% for hackney carriages, 186% for private hire and a net of 103% for the total licensed vehicle fleet. The most sustained growth was by private hire from 2007 to 2012.

In terms of the proportion of vehicles, at the present time the West Suffolk hackney carriage fleet makes up a third of the total licensed vehicle fleet, which numbers a total of 599 vehicles. In 1997, when statistics were first available, the hackney carriage fleet was 53% of the total licensed vehicle fleet, which was 295 vehicles at that point in time, just under half of what it is now.

In terms of driver growth, the same period has seen total drivers increase but only by 36%. Some of the lower growth may have been as people with two separate licences ended up with just a single licence although this does not appear to have been a major impact. The authority has effectively had a single driver licence over most of the period, although in reality a handful of people retained private hire only licences until quite recently.

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



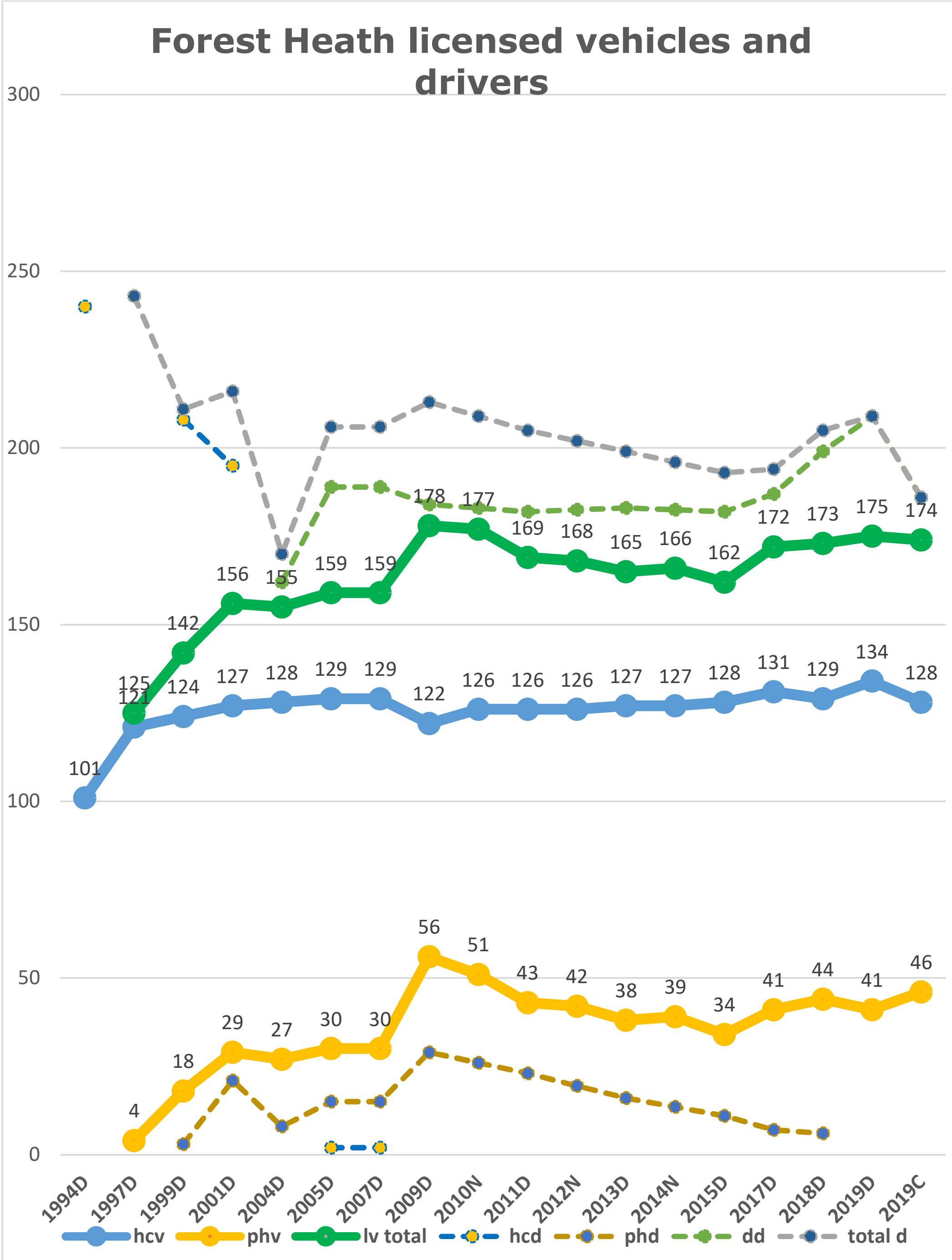
Operator numbers and levels of WAV provision in the fleet

(see bottom of p11 for explanation of abbreviations)

The overall picture is of operator numbers increasing sharply around 2009, but then steadily reducing to 2015 after which there has been increase up to the current level of just over 100.

Wheel chair accessible vehicle (WAV) proportions have generally been rising in both fleets, although as usual the proportion in the private hire fleet is lower. There was a slight dip between the two latest DfT provided values, but for the current Council values this demonstrates a continued gentle growth in the proportion of the fleet which is wheel chair accessible.

In order to understand the historic position for the two constituent authorities, the information regarding vehicle, driver, operator and WAV numbers has been presented below split by the two zones. Further presentation of disaggregated numbers is likely to be much less easy in the future unless specifically protected, and the split will only really be valid for hackney carriage vehicle numbers as drivers and private hire vehicles are already West Suffolk-wide. However, preservation of the historical record is important and the graphs and tables and commentary follow below. Where necessary, the latest council figures are estimated from our best information. The figures are presented for Zone A – Forest Heath, then for Zone B – St Edmundsbury with vehicles and drivers first and levels of WAV and operator numbers following. It should be noted for St Edmundsbury that dual driver licences have been in place there since at least 1997, with no separate estimate therefore for either hackney carriage or private hire shown in that graph.



Licensing Statistics from 1994 to date, zone A, former Forest Heath

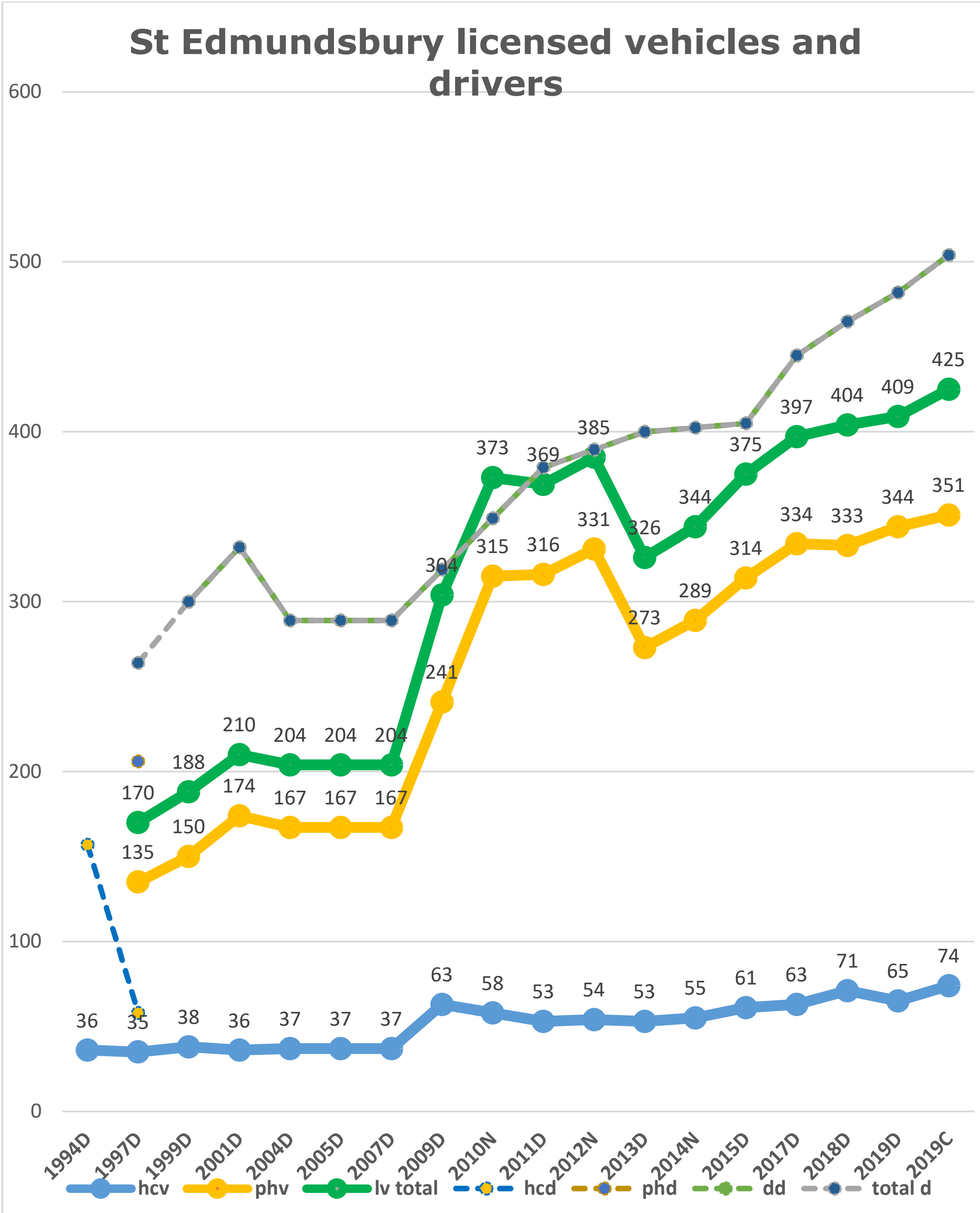
(see bottom of p11 for explanation of abbreviations)

The Forest Heath graph clearly shows hackney carriages to be the dominant force in the area, with private hire accounting for around a quarter of the total licensed fleet at the point of the last formal set of statistics for Forest Heath on its own.

A low proportion of private hire vehicles can often indicate that many of the private hire vehicles focus on contract and chauffeur type hires, rather than immediate hire work. Consequently, it is likely that Hackney Carriages undertake much of the pre-booked hires for immediate travel, along with hires from taxi ranks.

There was a clear and strong impact in numbers in 2008 in the fleet, with private hire vehicle numbers nearly doubling whilst there was a modest reduction in hackney carriage vehicle numbers, but nowhere near as large as the increase in private hire. However, since the increase, the number of private hires slowly dropped back to a level not much above the pre-peak level, although there has been growth in their numbers since 2015. This is in contrast to the hackney carriage vehicle numbers which have remained effectively stable since around 2001, with a marginal reduction in the last three years.

For Forest Heath, the impact of moving to dual drivers has been clear. At the last point when distinct numbers were produced for the zone itself, the number of total drivers was 16% less than the value at peak, suggesting a strong reduction in the number of people that possibly held both hackney carriage and private hire licences, or alternatively a strong reduction in the level of vehicle sharing.



Licensing Statistics from 1994 to date, zone B, former St Edmundsbury

(see bottom of p11 for explanation of abbreviations)

N.B. – for this area, dual drivers were introduced fully by 1999 and no separate split is available beyond 1997

The St Edmundsbury fleet at the last date of full information saw 18% of the vehicles were hackney carriage, opposite to that for Forest Heath. Given the significantly higher number of private hire vehicles than Hackney Carriages in St Edmundsbury, it is likely that the majority of private hire vehicles engage in pre-booked hires for immediate travel. Consequently, reliance on rank based hires, rather than pre-booked hires, amongst Hackney Carriages may be higher in St Edmundsbury may be higher than in Forest Heath.

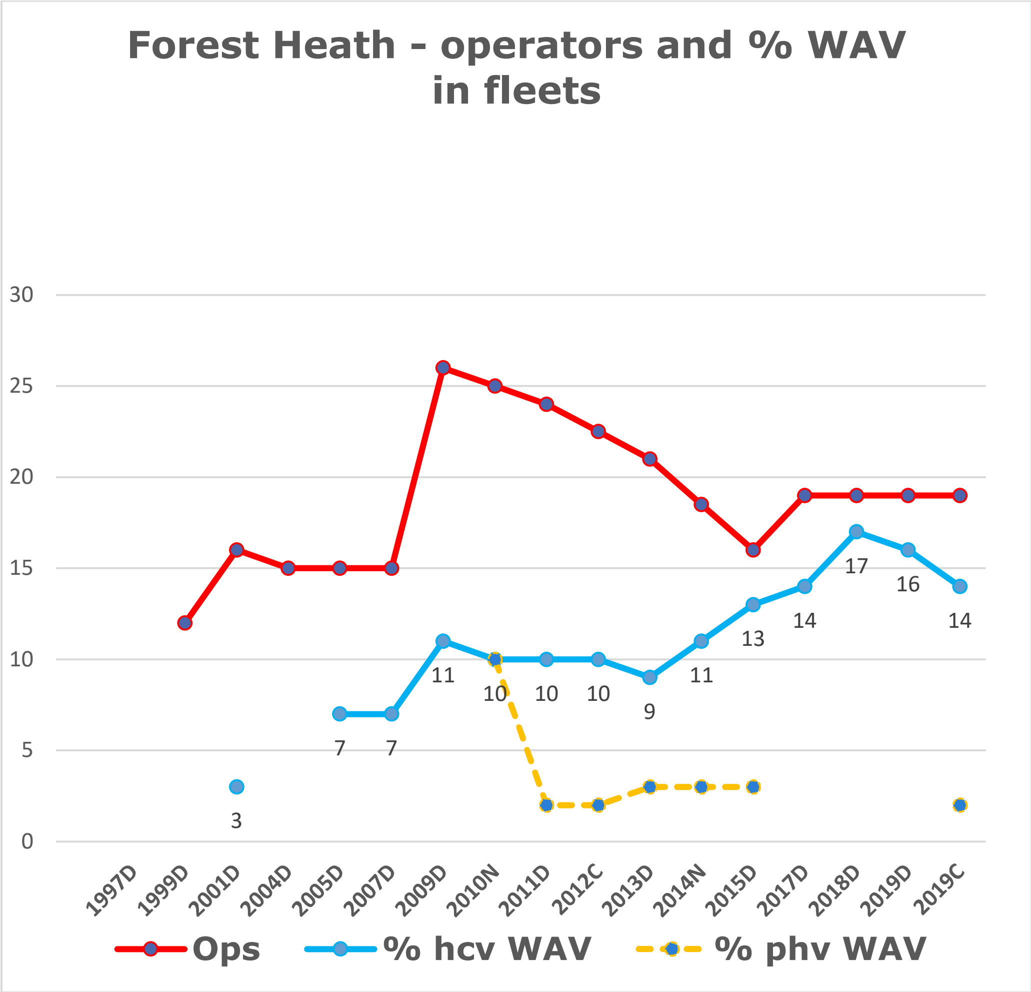
The impact of removing the hackney carriage limit in 2008 is also clear, with vehicle numbers rising by 70% initially, but then settling back to around about 50% more in 2014, after which there has been steady growth such that present numbers are now just 105% above their level in 1994 when statistics are first consistently available.

At the same time as hackney carriage vehicle numbers increased, so did private hire, but at a much higher pace, with the 2012 level some 95% above that first quoted in 1997.

There was a drop in private hire numbers in 2013, after which growth continued with the current estimated level in the zone some 106% above the 1997 value. This is very similar growth to that observed in the hackney carriage fleet which suggests this is the market level of growth for the licensed vehicle industry as a whole.

Driver numbers have grown consistently since 2004, although as in Forest Heath, not as strongly as vehicle numbers, with the driver growth being 90% from 1997. This is slightly less than the growth in vehicle numbers suggesting some move towards more single owner drivers. It should be noted that St Edmundsbury adopted dual driver licences fully by 1999 so there is no separate value available identifying different driver types, nor any potential to see any impact this change actually had on overall numbers to any extent.

Comparison of the operator and WAV statistics for the two separate zones are provided below:

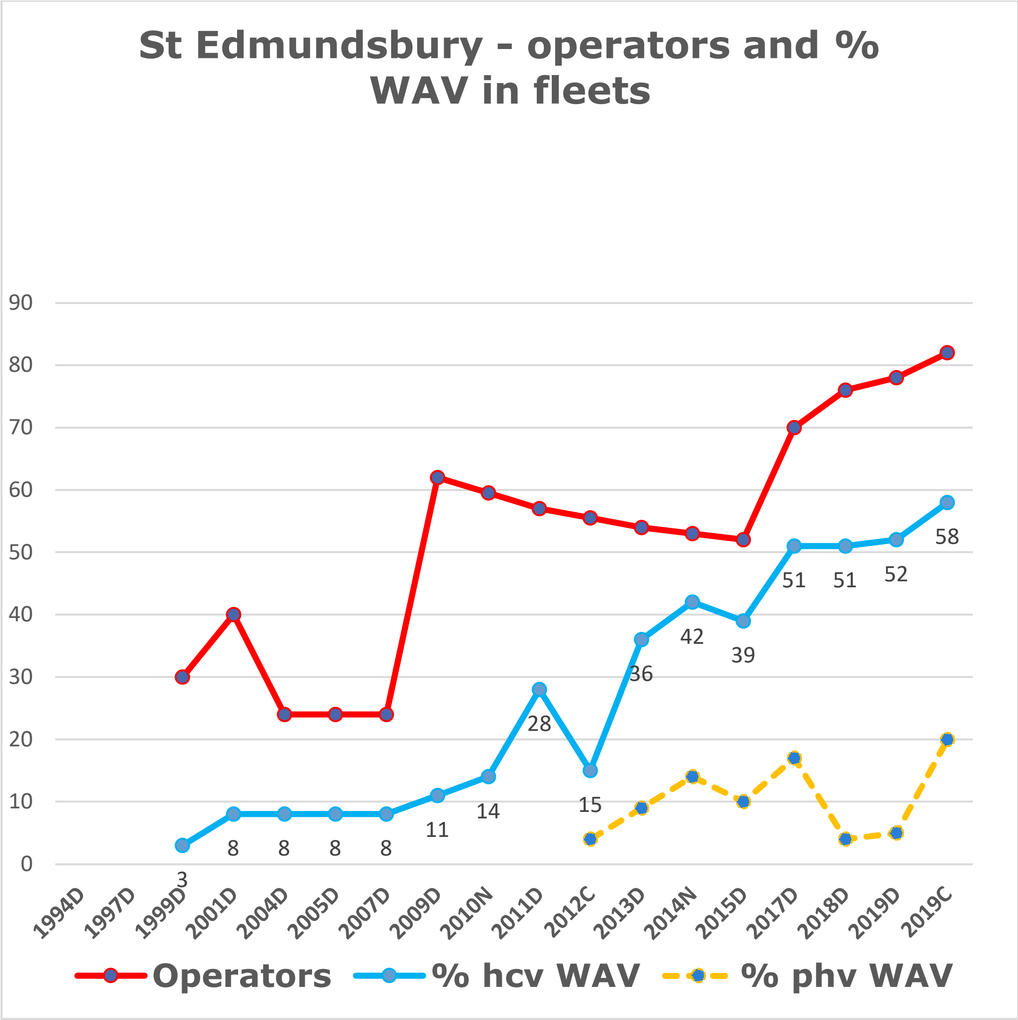


Operator numbers and levels of WAV provision in the fleet – zone A

(see bottom of p11 for explanation of abbreviations)

Operator numbers grew sharply in Forest Heath between 2007 and 2009 but then gently dropped back, after which there was an increase to 2017 and a period of stability henceforth.

On the WAV side, growth occurred from 2013 to 2018, but the latest value seems to show a decrease. Some private hire WAV existed, although the number was relatively low, as is typical across English licensing authorities.



Operator numbers and levels of WAV provision in the fleet – zone B

(see bottom of p11 for explanation of abbreviations)

For St Edmundsbury, operator numbers fell from 2009 to 2015 but have then demonstrated high growth levels. Proportions of the hackney carriage fleet that are WAV style have generally increased, with a level of 51% achieved by 2018 which has now seen increase to 58% for the latest available information (at the time of the rank survey). This needs to be held in the context that with the grandfather rights available at present, the maximum level of WAV for this zone could not be more than 66%. Private hire WAV were at a fluctuating level at around 10% although the recent figures suggest a significant growth up to a level of 20% of the fleet.

Fleet Structure

Details of the current vehicle, driver and operators were obtained in order to understand the present fleet structure in terms of levels of owner-drivers and other information about how the present fleet operates. When individual names are agglomerated there are some 989 records available (as at mid-July 2019). A detailed listing of the make-up of the industry is provided in Appendix 2. It must be remembered this is a snap-shot at the time quoted, as the area has no limits on hackney carriage vehicle numbers, and no other limits are legally possible at the current time, so numbers can fluctuate under the influence of a large number of influences.

There are 101 operators in the full licensing area. There are 397 private hire vehicles and 202 hackney carriages, with some 690 driver licences on issue. However, hackney carriages do not have to work for operators, although many choose to do so. Any private hire vehicle must either ally with an operator or have their own operator licence to be able to operate. Further, drivers can either own or rent either a hackney carriage or private hire vehicle, and people can own vehicles but do not need to be able to drive them. The make-up of the fleet operation can inform how needs are met across the area, and also define how available hackney carriages might be to ranks (and in fact how dependent they are on rank patronage).

In total, there are around 731 different individuals involved in the service overall. About half of these, 367, only drive vehicles but therefore need to rent a vehicle if they wish to work in the industry. There are a further 14 individuals who are drivers and also operators, but also own no vehicles. There are nine operators who do not directly own or drive any vehicles.

Of the total area hackney carriage fleet it is estimated that 60% are owner-drivers whilst at least 40% of the fleet is available for rent given that they are either owned by someone who has no drivers licence (9% of vehicles) or are owned by someone who has a drivers licence but also owns more than one hackney carriage (13% of vehicles). A further 17% of all hackney carriages are most likely available for rent given that they are part of mixed hackney carriage / private hire fleets where there is at least one other vehicle that the owner may well drive. The renting percentage is the minimum since any vehicle could be made available for rent even if owners can also drive.

When the same proportions are calculated for zone A, the rent proportion there is lower at 34%, whilst for zone B it is higher at 51%, suggesting some difference in typical operating practices between the zones. This is further highlighted by zone B having two large mixed fleet companies (including owning both hackney carriage and private hire vehicles). Between them these two companies own 21% of the entire vehicle fleet of the area. Other vehicles and drivers may affiliate with them.

As far as the statistics suggest, zone A's largest fleet is six hackney carriage vehicles, with most fleets in that area being of no more than four vehicles. There are, however, two moderate sized private hire operations each with around 2.5% of the total licensed vehicle fleet but both are based outside the two main towns.

On the private hire side, there are 116 single vehicle owner drivers (who would need to ally with a registered operator to be active) with a further 47 who are also operators in their own right who could therefore be legitimate private hire 'one-man bands'. Beyond this, there are a myriad of types of operation, most of which either need to attract a driver and be linked to an operator to be able to be active. One of the benefits of being a hackney carriage owner is there is no need to register as an operator to be able to serve the public, even by phone contact.

A review of the private hire operator names identified 23 that were executive or chauffer style (though the largest only had two vehicles, and several had no vehicles or drivers), two with unique names that suggest they might also be specific operations, five clearly airport focussed and five operators only registered with no specific name. This leaves 66 potentially public-facing companies – a huge choice for the area. However, many of these are small one vehicle operations, although the two largest are in fact mixed hackney carriage / private hire operations that would be highly public facing both by phone and rank.

It is clear that the current policies in place allow a very wide range of operating practices ensuring those in the industry can operate in ways that work best for them. It also suggests plenty of choice for the consumer although there is the issue that there are a large number of contact points for people which can be a negative particularly when many have just one vehicle and driver to offer any calls received. This may have even stronger repercussions with reference to need for accessible vehicles. Further discussion of the implications of these details are provided in the synthesis section of the report.

3 Patent demand measurement (rank surveys)

As already recorded in Chapter 2, control of provision of on-street ranks in West Suffolk Council is now under the control of the authority, albeit a separate section rather than directly within licensing.

Appendix 3 provides a list of ranks in West Suffolk Council at the time of this current survey. In terms of rank development, there has been very little recent change other than the provision of a clearly marked rank area within the new bus station at Mildenhall, which opened in 2005 but remains very well-marked. The High Street in Haverhill has been pedestrianised, but this did not affect the rank there (which is in fact in Market Street, near the Post Office and at the start of the town main axis).

Our methodology involves a current review both in advance of submitting our proposal to undertake this Hackney carriage demand survey and at the study inception meeting, together with site visits where considered necessary. This provides a valid and appropriate sample of rank coverage which is important to feed the numeric evaluation of the level of unmet demand, and its significance (see discussion in Chapter 7).

Our study site visit found a very old sign in High Street Haverhill which in fact pointed people to the Brook Service Road rank but away from the main Market Street location. Further the sign was not backed up with another that directed people along the passageway to the rank, but if followed would have led people to the private hire office further along. The Market Street rank was not observed in detail.

Whilst most ranks were well-marked the usual issues of faded road markings, or lack of such markings, were a specific issue for the central Bury St Edmunds St Andrew Street location which did badly suffer from private vehicle and delivery abuse.

There used to be a rank in Brandon, near the former Co-op (now Aldi), but the space provided became unused and it was agreed there was no need for any observation at that site.

During the course of the rank drive-round survey on the inception day the long distance between centres in the authority was noted. Some of the shortest links between the four largest settlements make use of minor roads to reduce distances. The Mildenhall link to Bury is often very congested.

Overall rank activity levels

For this survey, given a recent lack of rank usage data, and given the desire to have a much wider understanding of the actual usage of rank locations, a more detailed level of rank coverage was undertaken. This involved covering all ranks from 05:00 on the Thursday of the survey until 07:59 in the early hours of the Sunday morning.

All video footage was observed and each hour documented as having 'no activity', 'low activity' (up to two departures per hour, including vehicle only departures), and 'active' (three or more departures within the hour). A general view of the rank operation was also obtained from these observations. The hour by hour results are provided in Appendix 4.

A total of 671 hours of video observation were collected across the area. 58% of these were identified as having no hackney carriage activity at all. 15% of the hours saw light activity whilst the remaining 27% were identified as active.

For the full set of observations, there was no activity at any rank at any time between 03:00 and 04:59 in the early hours of Friday, reducing to the single hour of 04:00 to 04:59 having no activity in the early hours of Saturday morning. No activity was identified after 04:59 in the early hours of Sunday. Put more positively, there is activity at hackney carriage ranks somewhere in West Suffolk during all but six (or 8%) hours of the 75-hour period starting from early on Thursday morning.

For Zone A, Fred Archer Way Newmarket had no active hours and only four hours where there were light levels of activity. It was noted that this rank often had vehicles present, but no real passenger demand, whilst there were several cases noted of vehicles being left unattended sometimes for long periods. There was some pedestrian footfall past the rank, but mainly people clearly passing through with no intention to seek a hackney carriage at this point.

The White Hart rank in High Street Newmarket saw just nine hours active and over 53 hours with no activity. It was noted that this location was principally a feeder rank to the main High Street rank further along this busy axis. The active hours focussed on Friday night 21:00 to 01:00 inclusive and Saturday 21:00 to 03:00 inclusive.

Mildenhall's bus station rank saw 17 active hours and 37 inactive.

The busiest rank terms of active hours in Zone A, and also across the whole licensing district was the main High Street rank near WH Smith in Newmarket, which only saw 7 inactive and 7 lightly active hours from the 75-hour period. In effect it operated 24 / 7 apart from a few hours in the middle of each night, which reduced to a single hour in the early hours of Saturday.

For Zone B, the Station Feeder at Bury saw no active hours, just three hours with light activity, and the bulk of hours inactive, although this rank is the only one in the area which has part time operation.

The next least active location in Zone B was St Andrews Street, Bury which only saw ten active hours, and 45 inactive. There was some evidence that some of the passenger departures from this location may have been booked hackney carriage vehicles. Active hours were 22:00 Friday to 01:00 inclusive (omitting the midnight hour) and from 21:00 Saturday to the 03:00 hour, inclusive.

The Brook Service road rank in Haverhill saw just two active hours, 11 light and 62 inactive hours. It was noted that this location seemed to be a waiting place for hackney carriages in between booked journeys, only perhaps a few of which seemed to begin from this location. The two active hours were 10:00 Thursday and 12:00 Friday with the location generally quieter on a Saturday.

The Bury Station rank saw 23 active hours, 23 lightly used hours and 28 inactive hours, partly but not entirely related to the rail operating hours. For the record, train operating hours at the time of our survey were 05:30 to 23:29 Mondays to Fridays, 05:49 to 23:29 Saturday and 08:10 to 23:33 on Sundays. Operating hours were effectively 08:00 to 20:00 inclusive Thursday, 08:00 to 23:00 inclusive Friday and 07:00 to the midnight hour inclusive on the Saturday. This suggests mid-week evening services tend not to provide sufficient potential demand for vehicles to wait specifically for these trains.

The feeder rank in Station Hill is a council-provided rank that provides extra capacity here from 20:30 to 05:30. The layby tends to be used by a burger bar in the daytime and is often used for overspill parking from the station. Despite full time observation, there was no real usage of this location other than the occasional waiting hackney carriage.

The most active rank in Zone B was the Cornhill rank in Bury. This saw 57 active hours and 15 inactive and just one that was counted lightly used. However, this rank did see much larger overnight unused periods, with the operating hours defined in this manner as being 08:00 to 02:00 inclusive Thursday, 09:00 to 03:00 inclusive on the Friday and 08:00 to 03:00 inclusive on the Saturday. This is the second most active rank in the full area.

Further analysis

Some 248 hours of video footage were then analysed in detail to provide detailed passenger and vehicle arrivals and departures in hours determined to be active. Outline details from the quick watch were also added for a further 183 hours, and zero entries added for all hours observed but identified to have no activity during that hour. This provided detailed results tables covering some 668 hours in total, shown in Appendix 5.

Overall rank usage by all vehicles

At each rank observed, all vehicle and pedestrian movements were recorded, including any use of ranks by non-hackney carriage vehicles. Across the area, some 10,155 records were made of events at the ranks. 37% of these movements were at Newmarket's main High Street rank, with 24% at Bury Cornhill, 17% at the Newmarket High Street feeder and between 6% and 2% at each of the other locations.

Movements observed were then reviewed to identify the kinds of vehicles observed at each rank. 76% of all the records were actual vehicle arrivals and departures. Of these, 90% were identified as legitimate West Suffolk hackney carriages appropriate to the zone being observed. The next largest category were private cars, for which there were 6% of the overall movements. 2% were identified as private hire vehicles, with the remaining observations spread between goods vehicles (1%), out of town or out of zone licensed vehicles (1%) and emergency vehicles (less than 1%).

The main location abused by other vehicles was the St Andrew's Street, Bury rank. 40% of all observed vehicle movements here were private cars. A further 7% were goods vehicles. 15% were identified as local private hire vehicles picking up from this location. Hackney carriage movements here made up 38% although there was some evidence that some were actually booked trips by hackney carriage given the manner that passengers and vehicles met.

The Bury station feeder rank was only used by a small number of hackney carriage and a slightly higher number of private hire, but only for them to pause and leave without passengers. Unsurprisingly, there was a lot of usage of the rank by other vehicles, but some of this occurred legitimately in the hours the rank was not actually in operation, mainly related to people visiting the burger van that parks here, or for people dropping passengers off to the station when the station car park had no spaces.

All other ranks generally saw some other vehicles use them, but not to a significant degree. The only location never used by any other vehicle was the Fred Archer Way rank in Newmarket.

Overall rank usage

The detailed rank observations were analysed to produce hourly passenger and vehicle flows, and both vehicle and passenger waiting times by hour. Demand over the survey period was also used to estimate average weekly passenger levels for each location.

The table below shows total estimated weekly flows in descending order of passenger numbers. Where available, comparison is also made to earlier information.

Rank	2019	%A	%B	% all	2005
Newmarket, High St, main	2,332	78		44	
Bury, Cornhill	1,846		80	35	1,900
Newmarket, High St, feeder	395	13		7	
Bury, Station	303		13	6	600
Mildenhall	260	9		5	
Bury, St Andrews Street	92		4	2	30
Haverhill, Brook Service Rd	71		3	1	350
Newmarket, Fred Archer Way	4	0.0		0.0	
Haverhill, Market St					65
TOTAL	**5303**				

The busiest rank identified in West Suffolk in 2019 is the main High Street rank in Newmarket. This sees around 2,332 passengers in a typical week, some 44% of the total flow for the full area. The second busiest location is Cornhill in Bury, with 1,846 passengers, 35% of the overall area total.

There are then three ranks with very similar levels of flow, the Newmarket High Street feeder with 395 (7% of area total), the Bury Station rank with 303 (6%) and the Mildenhall rank with 260 (5%). St Andrews Street, Bury sees about 92 passengers (2%) whilst the Haverhill rank sees around 71 (1%). Fred Archer Way does see some passengers, but only at a very marginal level of just an estimated four per typical week.

The pattern of usage levels in the two current zones is remarkably similar, with one rank with about two-fifths of demand and another with 13%. Zone A then has one rank, the Mildenhall one, with the final 9% of demand whilst Zone B has two ranks, almost equally sharing the remaining 7% of demand.

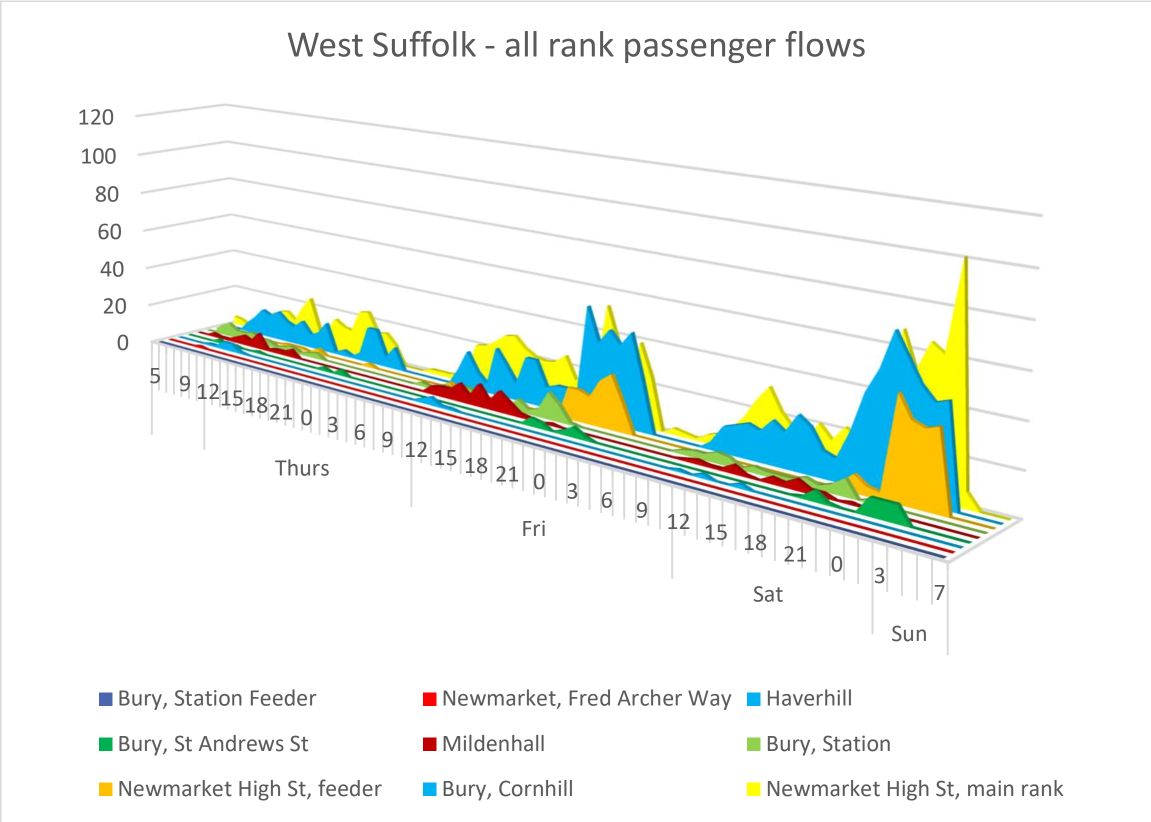
For Zone B, it is possible to compare current flows with those from 2005. Interestingly, the current demand at Bury, Cornhill is only 3% less than it was in 2005. Bury Station rank seems to have halved in usage whilst the St Andrews Street rank has tripled in usage since 2005, albeit only from 30 to 90 passengers per week. Observable demand at ranks in Haverhill has reduced significantly since 2005.

Total observed demand in 2005 for Zone B was estimated at 2,995 passengers per week with 3,144 associated hackney carriage vehicle departures. The fully detailed results of these surveys were not available, but four ranks in Bury and two in Haverhill saw passenger departures.

Hires per hackney carriage over the course of the survey are 23.36 for zone A and 31.2 in zone B. This suggests there could be some tendency for zone A vehicles to migrate to zone B when pre-booked work is light, but the difference is not stark enough to suggest any major flood of vehicles between areas.

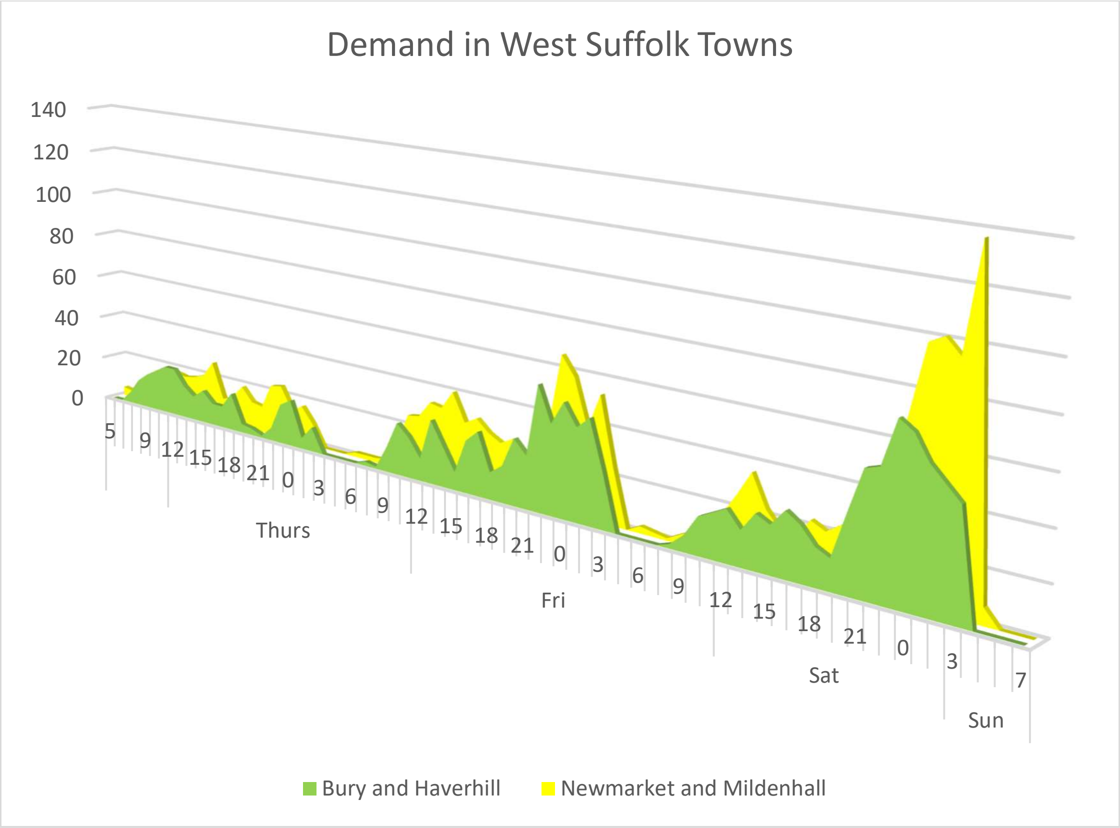
Demand over survey period

Data from the rank surveys is shown below in graphical form:



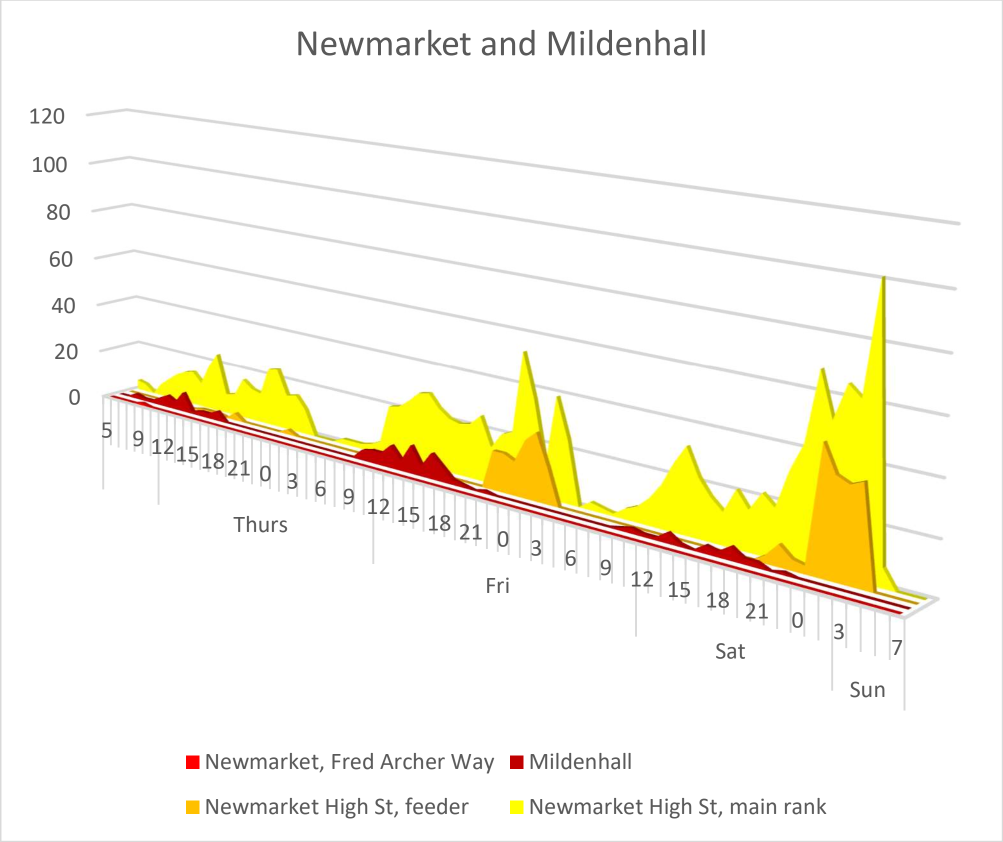
The graph demonstrates that demand rises generally from Thursday to Friday to Saturday, a typical profile of demand for hackney carriages at ranks. The graph shows zone A ranks generally in yellow / orange / red colours and Zone B ranks in blues and greens. This demonstrates, as from the previous table, that there is one key rank in each of the two zones, but that zone A has a fairly substantially used night rank whereas zone B has an all-day lesser used rank and a lesser used night rank.

The graph also shows profiles to be generally similar, except that zone A has a very pronounced peaky profile for late Saturday / early Sunday. The graph below which amalgamates all rank demand for each zone makes this more clear.



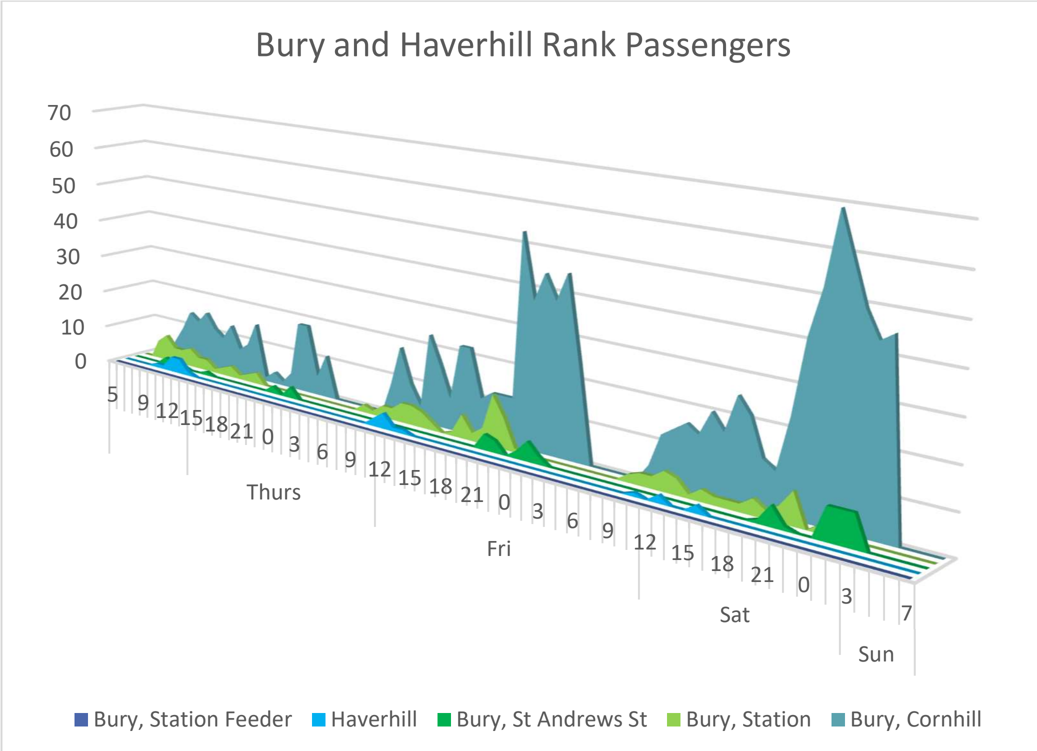
This confirms that the zone A demand profile is 'peaky' whilst that for zone B is not peaky. This is important for unmet demand since it is clearly much more difficult for a fleet to meet such sharp peaks in demand with a fixed number of vehicles than for it to meet more consistent demand levels. The comparison also shows that, apart from the overall 'peakiness' at weekends, zone A tends to have generally more consistent demand, whereas, certainly more so on the Thursday, zone B has demand peaks varying hour by hour, which in this case can make meeting off peak demand more difficult, and unmet demand more likely. Further discussion of this is provided with review of the overall delay data below.

To allow consideration of each rank in turn, each rank was also considered within the current zone system. The graph below, for zone A, demonstrates the dominance of the main High Street Newmarket rank to hackney carriage operation in these two towns. Although this rank operates almost 24/7, it is supplemented at night by what is in the daytime mainly the feeder rank further back along High Street. The other rank in the town, at Fred Archer Way, makes no real contribution to passenger demand.



The Mildenhall rank sees mainly daytime usage, although over generally extended hours partly related to the bus station coach arrivals, but also sees much more use on the Friday than either the Thursday or Saturday.

The rank B ranks are shown in the graph below:



For this zone, the main Cornhill rank is clearly very dominant, with high levels of usage on Friday and Saturday nights, although with generally consistently high levels of demand rather than very sharp peaks. The relatively wide variations in demand levels by hour in daytime hours are also demonstrated mostly on Thursdays but also on both Fridays and Saturdays. The main rank sees some night supplementary demand from the St Andrews Street rank although only at relatively minor levels.

The station rank in Bury provides demand mostly during the main daytime rail service hours, but this is again made peaky by the fact that train services peak every two hours. Both Friday and Saturday early evenings see moderate peaks in demand from the station. The rank in Haverhill is utilised, but only at certain times and mainly during mornings.

Passenger delay at ranks

An evaluation was undertaken of the passenger delays experienced at each of the ranks across West Suffolk during our survey period.

Despite being the location with the busiest rank and the most peaky of demand, Newmarket and in general zone A, had the least level of unmet demand identified. Of the total of 296 hours of rank operation observed, there were just five hours where average passenger delay was a minute or more, and five with any overall average passenger delay at all (less than a minute).

This is just 3% of observed hours with unmet demand, affecting less than 2% of passengers and seeing (at a harsher level) no more than 2.5% of all passengers travelling in hours when there was average passenger delay of a minute or more.

The most substantial period of unmet demand ran from 12:00 on the Friday through to the 15:00 hour, when a total of 13 passengers ended up having to wait for a vehicle to arrive, with one having to wait nearly 13 minutes. The top two highest average passenger delay figures arose from two hours, 12:00 and 13:00 on the Saturday in Mildenhall, where one passenger waited just under ten minutes and another just under four. These two hours however were generally of low demand which tends to over-estimate impacts of waiting.

For zone B, with most demand in Bury, all the cases where people had to wait for a vehicle to arrive were also at the Bury ranks. There were 12 cases where the average passenger delay was a minute or more. This accounts for 3% of all hours observed and 4% of all passengers observed in the survey period. However, ten of these occasions are at the station rank, which is subject to a supplementary permit with a fee to the rail operating company, which may restrict the number of vehicles servicing this location. Further, most of the waiting at that point occurs at periods of low demand, and is not helped by the specific train arrival times that bunch arrivals into short periods within each hour.

The two other hours with over a minute of average passenger delay were at the Cornhill rank, one of which arose from a very high flow of 69 passengers in the 23:00 hour on the Friday (in fact the busiest hour at any rank in Bury). This resulted in 28 passengers arriving with no vehicle there although the overall result of an average passenger delay of just under two minutes was very good in the circumstances.

There were 23 hours when average passenger delay occurred but was between three and 55 seconds. This was 6% of the total hours observed and affected directly 6% of all passengers. All but two of these occasions were at the Bury Cornhill rank, although on the positive side none waited more than five minutes, and most usually much less.

Using the much harsher measure of total passengers travelling in hours when the average passenger delay was a minute or more, 9% of all passengers were affected, but again many of these were at the station, although the worst case was the peak hour with 69 passengers impacted (but even in that hour only 41% actually experienced a wait.

In the 2005 surveys, undertaken in November/December and covering 191 hours by the ‘observer on the ground’ ‘five minute’ methods, for zone B only, it was found that most hours saw an equilibrium between supply and demand (89.6% of hours), with excess demand (passenger queues) in 6% and queueing of vehicles in 4.4% of the total hours. In 2019, the excess demand percentage was 9%.

Synthesis of rank operation

This section draws together the various methods of viewing the rank operation data to provide summaries by rank of their usage. This section is provided in order of level of usage across the full West Suffolk area.

The busiest, and most typical rank, in the area is the main High Street Newmarket location. It operates almost 24/7 and services both the shopping and night demand for Newmarket. The rank sees a very sharp peak in usage in the 03:00 hour in the early hours of Sunday morning – the only hour in the whole area with over 100 passengers and 59 vehicle departures.

However, even with this surge in demand, average passenger wait times in that hour are just seven seconds, with six people having to wait, none of whom waited more than three minutes. The more sustained period of unmet demand at this rank ran from the 12:00 to the 15:00 hours inclusive on the Friday – with a longest wait there of nearly 13 minutes, although this was the only person that waited for more than seven minutes out of the 13 in total that waited during these four hours.

This rank is supported by the feeder rank further back along High Street providing extra space for waiting vehicles. A very high level of daytime empty departures from the rank confirm its supporting role as a feeder. However, the feeder rank does have its own demand on Friday nights from the 21:00 to the 02:00 hours and on the Saturday night / Sunday morning from the 20:00 hour through to the 03:00 hour on the Sunday. The peak hour here was midnight on the Saturday with 46 passengers.

The other rank location in Newmarket at Fred Archer Way was mainly used as a waiting area by hackney carriages. There were around 40 vehicles recorded waiting here for various periods on both Thursday and Friday and around 30 on the Saturday. There were a very small number of passenger hirings from this location but in general it was more a rest rank than a feeder rank, with several examples of drivers leaving their vehicles, not just to use the nearby toilet. In some cases, the vehicle was left for significant periods of time at the rank.

The Mildenhall rank saw low but steady usage. This was only in daytime shopping hours on the Thursday but did see some later departures both on Friday and Saturday evenings. Most coach arrivals were supported by hackney carriage arrivals even if many did not see any hires resulting.

In Bury, the dominant rank is the central one at Cornhill, lying on two sides of the square at that point. The rank tends to start operation around 08:00 or 09:00 and then runs through to the early hours of the next day. The peak demand was some 69 passengers in the 23:00 hour on the Saturday night. Although there are not large peaks in demand at the rank, the pattern of passenger departures tends to have a saw-tooth profile over most of the operating hours, quite unusual. This was most pronounced on the Thursday when the profile by hour from 09:00 was 8, 18, 9, 4, 23, 16, 8 and 22 passengers with peaks at 10:00, 13:00 and 16:00.

This gives rise to higher levels of unmet demand than a more level profile might provide. The peak hour of demand led to a good proportion of those arriving having to wait for a vehicle to arrive, although the overall average passenger delay even for these was under two minutes and not too high.

The second most used rank in Bury was that at the station. However, demand here was relatively low but generally consistent, with some impact from the fact there are two trains in one hour and four in the next through the day. Most hours saw no more than six passengers, with the peak of 13 being in the 21:00 hour on the Friday night. There were several instances of unmet demand here but most were related to the combined impacts of low demand, train arrivals and the restricted number of vehicles able to service the rank arising from the private nature of the rank.

Despite being a 24-hour rank and being in the middle of a range of shops (albeit at the rear of several), the St Andrews Street rank tends to see only minor levels of usage, apart from on Friday and Saturday evenings, where there are more passenger departures. Some of the departures from this location appeared to be in reaction to people having phoned for hackney carriages, although there were people who waited here since quite a few hackney carriages did pass through along this route.

For the Brook Service Road rank, Haverhill, inactive periods saw some hackney carriages waiting and then departing empty – presumably the location is being used as a wait point between telephone hires. There were some passengers taken from this rank, although they tended to be during the morning hours and principally on Thursdays and Fridays although there was some Saturday demand. Most vehicles also appeared to be related to one company, although there were perhaps up to seven different vehicles observed with at least three appearing to be independent hackney carriages.

Vehicle activity levels

During the course of the rank surveys, records were taken of vehicles active at or near key ranks during the expected busiest survey day, the Saturday. Other information was also obtained during the video observations for the less busy ranks where this was possible. All observations were screened to reflect only current and correct records of hackney carriage vehicles identified from the fleet list provided for the project.

For the High Street, Newmarket, observations covered three 1.5 hour samples starting at 12:00, 18:00 and 22:30. Some 277 separate hackney carriage movements were recorded during these periods in total that were confirmed to be current zone A hackney carriages. Of all the observations, 25% were in the first time period, 23% in the second and 52% in the third.

Within these observations, over the full time periods covered 59% of all the available hackney carriages were observed. However, not all were observed in all time periods and there were 22% of the fleet observed in the 12:00 period, 30% in the 18:00 period and 40% in the later period. This suggests a good level of spare capacity exists in the fleet to meet any growth in demand at ranks.

During the survey period a sample was also undertaken at Mildenhall rank, but only one vehicle was observed. This vehicle was not observed in any of the samples in Newmarket. Other observations suggested the Mildenhall rank might be serviced by up to five separate vehicles, some 4% of the total fleet, and that these vehicles might tend to focus on work at that location. This implies that a total of 63% of the fleet was potentially active during the course of the survey for Zone A.

For zone B, plates were observed during the daytime at the station, in Haverhill and for two evening sessions at the main Cornhill rank. It also proved possible to identify over the three days the fleet active at the observed rank in Haverhill.

During the three days surveyed at Haverhill, seven different plates were observed, all servicing the rank in Brook Service Road. This accounts for 8% of the zone B hackney carriage plates.

The station observations identified just three different vehicles servicing that location during the period observed. This equates to 4% of the fleet available for the zone. Of these vehicles, two were also observed at the Cornhill rank.

The Cornhill rank was observed during two periods, starting from 18:00 and also from 22:30. No earlier observations were undertaken. During these two periods, 31% of the available fleet was observed with a total of 67 different vehicle movements observed. If the Haverhill plates were assumed to principally service that location, the proportion of plates observed in these two periods would be 34%. The two time periods saw 18% and 24% of the total zone B fleet. Had daytime observations been undertaken, they would most likely have increased the level of vehicles seen by perhaps a further 20%, with the overall fleet seen perhaps up to 60% or so. Adding the Haverhill plates would suggest the Saturday would see around 70% of the fleet active. Adding in weekday operations would perhaps take the active fleet closer to being fully utilised.

The 2005 active fleet level during the full survey data collection was estimated at 78% of the 36 licences then on offer. Given that demand at the principal rank is about the same this suggests a lot more work must be being undertaken by hackney carriages on radio circuits to provide for the almost doubling of the fleet from that level.

However, these figures still suggest there is spare capacity in the hackney carriage fleet to meet further demand if necessary although further information would be useful in this regard in terms of undertaking further samples through the week.

Disability usage of vehicles

Of all the hackney carriage movements observed at all ranks, 26% were identified as potentially wheel chair accessible hackney carriage vehicles across the whole of West Suffolk. This is remarkably similar to the 25% of the fleet that is understood to be wheel chair accessible at this point in time.

There were just two persons observed entering hackney carriages using wheel chairs during the survey. One was at Mildenhall, and the other in High Street, Newmarket. There were a further 31 people observed with other forms of disability being assisted into vehicles – 15 at Cornhill, Bury, one at Haverhill and six at Mildenhall.

4 General public views

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

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

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

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

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

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

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

For this survey, there were 145 interviews in Newmarket on Friday 26th July, 50 in Mildenhall on Wednesday 24th July, 73 in Bury on Wednesday 17th July, a further 40 there on Tuesday 6th August then 50 on Tuesday 24th September (total 163), and finally 50 in Mildenhall on Wednesday 24th July. This provided a robust sample of 195 for zone A and 213 for zone B as well as a more than robust sample for the area in totality.

2019 population statistics were obtained from the current estimate available from the 2016-based national statistics estimates. For West Suffolk, these estimates suggest 50% of the 16 year old or over population are male whilst 21% are under 30, 38% aged 31-55 and 41% over 55. Our total sample was very slightly biased towards females (51% of interviewees), with less of the lower age group interviewed (13%) with marginally more of the middle group than the census (38%) and proportionately much more of the older group (47%). Within the total picture, these small discrepancies should not overly affect the results obtained.

Interviewees were asked if they had used a licensed vehicle in the area in the last three months. 57% said that they had. All then told us how frequently they had used local licensed vehicles based on the categories in the National Travel Survey. The resulting estimated number of licensed vehicle trips per person per month was 1.5, relatively low. When the question was narrowed to usage of hackney carriages, the estimated value dropped to 0.2 trips, or 15% of the total licensed vehicle usage.

For the totality of West Suffolk, a third of the responses (for some of which people gave more than one response), were that they got a licensed vehicle at a rank. 3% said they hailed, suggesting a total of 36% for hackney carriage (quite a high level). 53% telephoned, 5% used a freephone and 5% used an app. 1% said they never used licensed vehicles at all.

Those making bookings by phone were asked to name up to three companies they called the most. With many giving multiple entries, a total of 450 different mentions of company names were obtained.

There were just three companies that received more than 7% of the total responses. These received 20%, 15% and 13% of mentions. The top company was mentioned in Bury with one mention in Mildenhall, whilst the other two companies were mentioned either in Newmarket or Bury only.

Only eight other companies scored between 2% and 7% of the total. One was mainly mentioned in Mildenhall with some mention in Bury. Five of these companies had most of their mentions in Haverhill.

The remaining 35 names provided obtained 1% or less, three mentions or less each. This suggests a high level of one-man band operation although their overall share of business is not high. It also suggests more private hire company activity and competition, particularly in Haverhill.

There were five companies or web sites named that people used. The largest, with 54% of mentions was a national app, followed by 17% for a locally based app. The bulk of these responses were Bury-based, with Haverhill second in importance.

Across the area, 9% of those responding said they could not remember seeing a hackney carriage in the area. A further 25% said they could not remember when they last used one, although nationally this is a relatively low level suggesting people are generally fairly aware of hackney carriages in West Suffolk.

The top two known ranks obtain almost equal levels of response – with 35% saying they are aware of Cornhill, Bury and 34% High Street in Newmarket. Mildenhall bus station is third with 14% of overall response followed by Bury station with 8%. High St Haverhill has 3% of mentions. In general all ranks are only quoted in the sample interviewed in the actual location, although one person in Mildenhall was aware of Bury station rank and one person in each of Newmarket and Mildenhall was aware of the Bury Cornhill rank.

Other mentions of ranks are either general locations or places it is not clear why people think there is a rank there – although none get more than four mentions each. This confirms that in general each settlement only has one rank of which the public are widely aware, with Haverhill having the least known location (and the actual used rank was not named by anyone directly, whereas the little used rank was the one named).

Across the area, 55% of people naming ranks said they used them.

Only people in zone B told us why they did not use ranks. Of the small number of responses, 20% said they preferred to book by phone, 17% said there were not enough vehicles, 13% said they preferred the convenience of being collected where you were if booking by phone and 10% said it was because they drove their own car and 10% said they felt hackney carriages were more expensive than private hire.

Interviewees were asked to rank various aspects of their most recent trip by licensed vehicle. For the whole area, the overall response for all aspects was that experience was 'very good', with that score always the highest of any, and with next to no responses of very poor or poor at all.

The usual poor score compared to other factors for price was only very marginally evident suggesting people are generally happy with the level of fares, and certainly not as strongly against them as in most other places around the country, although there were some specific comments about hackney carriage fares being high (but only a few).

For West Suffolk as a whole, the main matter that might encourage people to use more hackney carriages, or use them more often, was more that they could phone for. This accounted for some 50% of all responses. Better vehicles were second, but with just 15% of the scores. 17% said other and then specified this to mean cheaper fares.

The area generally had only a moderate need for adapted licensed vehicles, although the need when identified was more for wheel chair accessible than any other adaptation. However, for this element there was a clear difference with zone B needing more adapted WAV style vehicles from people's responses than for zone A, where there generally seemed to be very little quoted need.

70% of those responding felt that people in the West Suffolk area that had disabilities got a good service from hackney carriage vehicles and drivers. Just 4% said they felt they did not, with the remainder all saying they did not know what the situation was.

6% of respondents across the area had given up waiting or made alternative arrangements when trying to get a hackney carriage from a rank in the area. Nearly all quoted actual rank locations giving a latent demand factor for the area of 5.6%. The main issue quoted was at the Cornhill, Bury rank. The hailing proportion was 4.7% at a variety of locations but nearly all in either Bury or Newmarket. In both latent demand factors, there was some mention of issues on race days.

People were asked if there were enough hackney carriages in the area. 73% said there were.

With reference to feeling safe, all but one person responding felt safe in the daytime, with the value falling to 97% for night travel. Only a few people told us what would make them feel safer, the main item being having more female drivers, with the second being an ability to verify driver identification more easily at night.

The largest proportion, 40%, felt that fare levels were fair. 36% felt they were expensive whilst 22% said they had no opinion.

37% said they would use an electric hackney carriage, but only if it did not have any negative impact on the cost of usage. 60% had no preference, whilst 3% would use and be prepared to pay up to 10% more for using them.

The opinion about if local hackney carriages should have a livery came out with 60% saying no. Most of those stating what a livery should be suggested taking on the Newmarket livery across the area, although there were a wide range of suggestions given although by less than a quarter of respondents making suggestions.

54% of respondents would be happy to use credit card facilities in hackney carriages, again as long as it had no impact on raising fares. 36% of those responding said they would still pay in cash whilst 8% said they would use that facility for every journey they made.

66% said they had regular access to a car. 82% said they lived in the West Suffolk area. Those that did not quoted a wide range of alternative areas, most of which were from the surrounding area including Ipswich, Cambridge and Chelmsford postcodes.

Differences between the two zones

In terms of the sample structure compared to population, zone A interviewees were more biased to females (53%) than the 49% in the census. This greater level of bias was also accentuated for the lower age group (11% compared to 24%) with even more older group interviewees than the census estimate (47% compared to 38%).

Zone B interviewees saw marginally more men interviewed than estimated by the census (51% compared to 50%) but saw exactly the census level of the middle age group with the lower proportion of lower group replaced exactly by more older group interviewees.

Although the interviewee structure compared to the census was different between the areas, and in fact the census values also differ by area (with the census suggesting zone B more equal on men and women than zone A, whilst the population of zone A tends to have more older groups represented, these differences were not significant.

Zone A interviewees said they had used licensed vehicles less than the area average (54%) whilst zone B had used them more (60%). However, there was a bigger difference between Newmarket (59%) and Mildenhall (38%) and in fact it is the Mildenhall low level of recent usage that tips the zone A value away from the average. In this respect therefore the typical level of recent usage is the same across three of the four largest settlements, with only Mildenhall seeing lower usage.

In the previous zone B survey, 51% of those not using hackney carriages said it was because they had a car available, 16% had no need to use hackney carriages, but did not say why, 6% preferred private hire and 4% had been deterred by delays getting hackney carriages when they had used them.

With respect to estimated levels of usage of licensed vehicles in the separate areas, the average for the full area and the two zones was the same at 1.5 trips per person per month. However, again this masked differences within the four settlements. In this respect Bury saw the highest usage (1.8), Newmarket second with 1.6, Mildenhall next with 0.9 and Haverhill came out lowest with just 0.7 trips per person per month estimated.

For hackney carriage usage levels, the value dropped to 0.2 across all settlements and combinations, apart from Mildenhall which had a value of 0.3 trips for hackney carriages, higher than any other area. When the proportion of trips made by hackney carriage was estimated comparing these two values, the two smallest settlements saw higher proportional usage of hackney carriages, both at 32%, with Newmarket seeing the lowest proportion, 11% and Bury the second lowest at 14%. Zone A came out below average at 14% whilst zone B was marginally above at 16% of all trips made by hackney carriage.

People were asked how they normally got licensed vehicles. There were some who gave multiple answers. Of all the responses, the highest quoted level of rank usage was in Newmarket at 42%. Bury had 31%, Mildenhall 23% and Haverhill the lowest at 22%. This meant that zone A had higher than area average levels at 37% and zone B lower levels at 29%. The zone B level was not much different to that identified by the demand survey last undertaken (27% rank). On the contrary, hailing was highest in Bury (4%) (but had been 11% at the time of the last demand survey), average in Newmarket (3%), lower in Mildenhall (2%) and zero in Haverhill. Overall, compared to the average zone A was below at 2% whilst zone B was average.

All those saying they never used licensed vehicles were in Haverhill. Free phone usage was effectively zero in zone A but much higher in zone B, mainly in Bury but also significant in levels in Haverhill. No-one said they used a free phone in Mildenhall and just one person said they did in Newmarket. This is a clear significant difference between the two zones. The same was true for apps, although levels in zone A were just one person in each settlement saying they used them.

Mildenhall saw the highest direct usage of phone bookings at 74%, followed by Newmarket with 54% and both Bury and Haverhill at 49%. This puts zone A more dominated by phone bookings than zone B (59% compared to 49%, with the latter much reduced from the level of 62% quoted for the last survey there).

In terms of companies used, the largest quoted company saw all but one mention in Bury. The second largest was solely mentioned in Newmarket with the third largest only Bury mentioned. Haverhill had five different companies named making this the place with most apparent competition in terms of private hire or phoned for work. Mildenhall has one company dominant, although that company did get some mention also in Bury.

The largest response in terms of names given was for Bury, which obtained just over half of all the responses, whilst Newmarket was second, but with just 20%, Haverhill with 19% and finally Mildenhall with just 11%. In terms of size of place, Haverhill is probably the most dominated by companies.

Zone A had a marginally lower than average level of people who could not remember seeing a hackney carriage in the area, 8% compared to 11% for zone B and 9% overall. This suggests there is some, but not significant impact of the livery in zone A.

Zone A also has the lowest level of people who could not remember when they last used a hackney carriage. The level of 18% is below both the area average of 25% and the much higher level of 26% for zone B. This seems to be a stronger evidence that the livery does help increase hackney carriage usage in zone A, although not so much the perception of the vehicles per se.

Haverhill had the highest quoted level of use of ranks known about at 67%, with Newmarket and Bury second equal at 59% and Mildenhall the lowest at just 29%. Overall zone B sees higher than average actual use of known ranks compared to the average and zone A, which is lowest.

Only one person from zone A told us why they did not use ranks. There was a larger, but still small response for zone B, although a range of reasons were given none of which were particularly significant.

With respect to views about aspects of a persons' last licensed vehicle journey, there was some variation across the areas. However, the principal differences were more between the two larger areas and the two smaller areas than between the two zones. For example, views of the service were high in Mildenhall, with the small responding sample all generally rating the service very good (76% of responses for all categories). On the contrary, scores at Haverhill were generally lower, with the main score for all aspects being 'good' rather than 'very good'. However, there were no very poor or poor scores even there. It was clearly an overall issue with all aspects of the service in Haverhill rather than anything specific.

Bury generally had high levels of 'very good' scores although there were also a few 'very poor' scores but not of great significance.

Newmarket respondents seemed to switch between 'good' and 'very good' as the dominant score, with a few more of 'poor' and a small number of 'very poor' scores but none of any real significance.

Although more hackney carriages people could phone for was the top encouragement for people to use hackney carriages or use them more in all but one of the separate locations, this value was strongest in Mildenhall (91% of responses), and really the only issue there, and least in Haverhill (5%). In Haverhill, 60% said increased use would arise from better vehicles.

The highest level of response about matters that might increase usage was from Bury followed by Newmarket. In the previous zone B survey, 32% had said they would see improvement if fares were lower and 13% had said the improvement would be to have more hackney carriages (which was what happened when the limit was removed).

With reference to need for adapted vehicles, there was a clear difference between zone A and zone B. More people needed adapted vehicles in zone B with the bulk of the need being for fully wheel chair accessible vehicles. There was very little overall need stated in zone A.

The latent demand factor for ranks ranged between zero for Haverhill up to 1.1 for Bury, mainly related to issues at Cornhill. Zone A values were much lower, 1.02 for Mildenhall and 1.04 for Newmarket, with much of the Newmarket value attributed to race day issues. The difference between the zones in this regard is significant.

More people in zone A felt there were enough hackney carriages overnight compared to zone B (78% compared to 67%). This was mainly dominated by a very high level for Newmarket (93%) offset by a very low level for Mildenhall (38%) which was the only place effectively people felt there were not enough hackney carriages at night. Again, the significant difference between the locations was not between zones but between two places in the same zone. This is typical in other zoned areas we have studied (e.g. the differences between Penzance and St Ives operations which are both in one Cornish regulated zone).

There was no real difference between the zones or places in terms of feeling safe in the day or at night although everyone in Haverhill felt safe travelling day and night, the only location of the four with a full score in both cases.

There was, however, a significant difference between zones A and B in regard to the view about fares. People in zone A felt fares were expensive (47% said this compared to 26% for zone B). Less people in zone A said they did not have an opinion (10% compared to 33% for zone B) suggesting this was a clear issue for zone A. In the previous zone B survey, people there had under-estimated the cost of fares, believing a typical fare then to be £4-13 compared to the actual £6-71. It is not clear if this continues, which might help explain the lack of concern re fare levels in zone B.

There was also a difference between zones in reference to use of electric vehicles with 46% saying they would use them in zone A compared to 30% in zone B (as long as they did not cost more).

There was also a strong difference regarding the need for a livery. Zone B respondents generally said no (76%) whereas zone A said yes (59%). However, again there was a stronger difference between Newmarket – pro livery and Mildenhall – anti-livery. Those pro-livery in zone B gave a much wider range of suggestions with the current zone A livery only gaining 12% of votes compared to 18% for black and 15% for yellow, although people in Haverhill favoured the zone A livery with 57% suggesting that.

Zone A respondents were more generally in favour of still paying in cash (48%) compared to zone B (26%) with zone B more in favour of credit cards as long as there was no surcharge.

Access to cars was similar by zone, but again varied more within each zone, although for zone A Mildenhall had higher car access whilst for zone B Bury had the highest level.

Zone B respondents felt a much higher level of good service to those with disabilities (81%) compared to zone A (56%). However, the main area with a lower positive response overall was Newmarket, with just 52% feeling people with disabilities got a good service compared to 86% for Mildenhall, 79% for Bury and 86% for Haverhill.

In the previous zone B survey, a more detailed mobility impaired user survey was undertaken. The eight response to this suggested that 86% of them found the wait time acceptable with a similar level happy with the assistance provided and all found it easy to enter and exit the vehicles then available. All these users phone for their wheel chair accessible vehicle they needed. A hackney carriage accessibility day was run on 25th September 2007 with two vehicles (an E7 and an M8) demonstrated with the latter vehicle preferred.

There were more people living in the area in zone A (87%) than zone B (77%) with very consistent responses within the zones.

For hailing latent demand, the two zone averages were marginally different but generally much closer (1.06 for zone A and 1.04 for zone B). Again there was an element of Newmarket related to race day shortages. In this case, there was some latent demand in Haverhill although neither related to the central area and one reference was to issues in Bury. The locations where people had issues with hailing were much more spread out, showing an expectation of ability to hail vehicles area-wide.

The combined values for latent demand were much less different, with zone A having 1.09 and zone B 1.11. The average for the area was in between these two values. Again, Haverhill had the lowest value and Bury the highest. These values are taken forward to the estimation of significance of unmet demand in the chapter below regarding this.

5 Key stakeholder consultation

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

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

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

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

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

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

Further listing of who has responded and how is provided in Appendix 7 but ensuring privacy where appropriate for those contacted. In general, there was a very low wish to provide any response despite several approaches being made. This suggests little likelihood of there being significant issues.

Supermarkets

Two supermarkets in Newmarket, one in Mildenhall, two in Bury and one in Haverhill gave no response. Another supermarket in Haverhill said their customers used local licensed vehicles by calling the freephone which went to a local operator. They were not aware of ranks, nor of any issues with the service provided.

Hotels

One Newmarket hotel, and another in Brandon were too busy to provide any response. A hotel in Mildenhall said their customers used local licensed vehicles. They either asked staff to book them or booked themselves. They were not aware of any rank nor any issues with the service provided. A hotel in Bury told us their customers used local licensed vehicles, asking for them at reception. They were aware of a central rank. The only issue was that there were peak waits of up to an hour for a booked vehicle to arrive. Another Bury Hotel made no comment. One Haverhill hotel told us their customers asked staff when they needed a licensed vehicle. However, they felt there were never enough vehicles which meant they had to advise customers to book well ahead to avoid issues.

Public houses

One public house in Newmarket, another in Mildenhall, and another in Haverhill did not respond. A pub in Brandon refused to provide any comment. Two pubs in Bury told us their customers used local licensed vehicles. One said when people asked they gave them local company cards whilst the other said they would book companies, or often people made their own arrangements. Both were aware of ranks but in both of these cases they were five to ten minutes' walk away. Neither had received any reports of issues.

Night clubs

One Newmarket night club had permanently closed. Another told us their customers did not use local licensed vehicles, nor did their staff. A further location told us their customers used licensed vehicles from the rank outside their premises, with no issues raised. No night clubs were identified in Mildenhall. One Bury night club would only give comment if we promised them a full copy of all the information collected, whilst another did not respond. The night club identified in Haverhill did not respond.

Other entertainment venues

The Racecourse in Newmarket, a museum in Mildenhall and another in Bury, together with a cinema in Haverhill and another location in Brandon, all gave no response.

Restaurants

One Newmarket and one Mildenhall restaurant did not provide a response. One restaurant in Bury said their customers used licensed vehicles, but that they booked them for themselves. They were aware of a rank about three minutes' walk away. No issues had been reported. Another Haverhill restaurant said they were too busy to make any response.

Hospitals

The Newmarket Community hospital had no comment. West Suffolk Hospital had no relevant person available.

Police

No comment was made.

Disability

No comments were provided.

Overall, there seems to be some knowledge of ranks by key stakeholders, but with most usage being by bookings. There is little appetite to make comment, suggesting few issues, although one location did suggest they had a problem with response times from booked vehicles in Haverhill.

6 Trade stakeholder views

The BPG encourages all studies to include 'all those involved in the trade'. There are a number of different ways felt to be valid in meeting this requirement, partly dependent on what the licensing authority feel is reasonable and possible given the specifics of those involved in the trade in their area.

The most direct and least costly route is to obtain comment from trade representatives. This can be undertaken by email, phone call or face to face meeting by the consultant undertaking the study. In some cases to ensure validity of the work being undertaken it may be best for the consultation to occur after the main work has been undertaken. This avoids anyone being able to claim that the survey work was influenced by any change in behaviour.

Most current studies tend to issue a letter and questionnaire to all hackney carriage and private hire owners, drivers and operators. This is best issued by the council on behalf of the independent consultant. Usual return is now using an on-line form of the questionnaire, with the option of postal return still being provided, albeit in some cases without use of a freepost return. Returns can be encouraged by email or direct contact via representatives.

Some authorities cover private hire by issuing the letter and questionnaire to operators seeking they pass them on when drivers book on or off, or via vehicle data head communications.

In all cases, we believe it is essential we document the method used clearly and measure response levels. However, it is also rare for there to be high levels of response, with 5% typically felt to be good and reasonable.

Copies of the letter and questionnaire were issued by the Council on our behalf to all drivers, owners and operators across West Suffolk. In the order of 731 were issued to the addresses provided to the Council by those involved. A total of 54 responses were received, a 7% response rate. Some were returned to the Council offices and scanned and emailed to us, others were posted whilst a third were completed using the on-line option.

The highest level of response, with some 59% of the total, came from those that said they drove a hackney carriage vehicle. 37% said they drove private hire whilst 4% said they drove both private hire and hackney carriage.

All those who said they drove hackney carriages told us the zone they worked in. 65% said they worked in zone A and 35% in zone B. This is very similar to the proportion of the hackney carriage fleet in each zone (37% of hackney carriage vehicles are registered for zone B).

For this survey, the average quoted length of service in the trade was just under 12 years. Unusually, the private hire average was higher, at 14 years, compared to the hackney carriage average service of 10 years. Some said they had been in the local trade for up to 35 and 45 years.

The average number of days worked was very similar between hackney carriage and private hire, and therefore overall, with hackney carriage tending to work slightly more days (4.8 compared to 4.6). For private hire the highest proportion said they had worked five days (44%) whilst for hackney carriage it was six days (but 31%). The proportion working seven days was actually higher for private hire (17%) compared to hackney carriage (13%). Average hours quoted were marginally higher for hackney carriage (41, range of 10 to 70) compared to private hire (37 but with a range of none to 80). This does not suggest a major difference between the two trades.

Many told us the various reasons that affected when they worked. Over the full sample, 23% of responses were family commitments, 19% preference, 18% avoiding heavy traffic and 16% working at busy times. 7% said they chose working arrangements to avoid disruptive passengers. Just 1% said their working hours were affected by having to share a vehicle.

89% said they owned their own vehicle. Just 22% said someone else drove their vehicle.

83% across the full survey said they accepted pre-bookings. Most said these came from people phoning in to an office (50%), with a further 22% saying they came via an office radio. A variety of other methods were stated including app and business card usage. A wide range of companies (20 in total) were quoted who provided drivers with their pre-bookings. The top quoted company took 31% of mentions given. Two others obtained 9% of quotes each, with the remainder only mentioned by one person each. Eleven of these were not formal private hire operator names, though they could be hackney carriage operating names that do not need a named licence.

Most hackney carriages told us the ranks they serviced, some giving more than one response. Of the total responses, 49% said Newmarket with 29% saying Bury, in both cases mainly referring to the main rank in each location. 9% said they served Mildenhall whilst a further 9% said they serviced Fred Archer Way in Newmarket. Two of those stating Mildenhall also said they serviced Newmarket ranks.

For all respondents, about a third said their main method of getting fares was from the ranks, and another third from telephone bookings. 2% said from hailing whilst 9% said most work came from school contracts. A further 9% said they got work from an app. Several said work came in by email.

Very few claimed all their work came from any one source, not even for telephone bookings.

Comments made included one person telling us they mainly worked in the office but drove occasionally. Another pointed out there was an issue that new entrants were restricted by the need to have a new vehicle to enter the market.

Most responded to the question if a limit on hackney carriage vehicles should be applied. 85% said it should, with many of these being private hire drivers. Two hackney carriages felt no limit should be applied, but one of these got most of their work from school contracts, whilst five private hire did not think a limit was needed.

Many gave reasons why they thought a limit would benefit the public. The top two, with 11% of the mentions each, were that it maintained quality of service and that it reduced pollution and congestion. 7% said it meant customers would know the drivers and companies if the market was more stable, a similar percentage also said it maintained driver quality and increased safety. However, 11% said they were unsure and 7% said they did not think it would be any benefit. There was one response each for reducing over-charging, reducing over-ranking and stopping illegal touting for customers.

Most responded if they felt there were enough hackney carriages licensed in the West Suffolk area. 96% said they thought there were.

60% of those responding felt fare levels were currently about right, with 22% suggesting an increase was needed, 7% saying they needed to be reduced and 11% giving other reasons. Some made comment in the further sections feeling that the night fare was too high and the day too low, or that the time the night tariff should start should be earlier.

A good number also told us their view about putting the two hackney carriage zones together. The margin from those giving their view was close, with 51% saying they should not and 47% saying they should be merged.

Other comments were provided. Two said removing the zones would reduce empty trips between the two main centres.

One was concerned about ending up with a two-tone livery. Others made comment about needing more ranks. Various other comments about specific details were also made, not necessarily relevant to this review.

No other trade feedback was received, particularly as no trade representatives were understood to exist.

In 2005, there was a trade response suggesting that the one plate extra that was needed was due to one hackney plate not being not in use at the time of the survey, so they suggested the area did not actually need more. They suggested this one should have been reissued as a WAV. No response was found to this comment.

7 Evaluation of unmet demand and its significance

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

ISUD component	2019			2005	2003	1997
	Zone A	Zone B	All West Suffolk	Zone B	Zone A	Zone A
Average passenger delay	0.07	0.37	0.2	0.75	0.19	0.23
Overall delay over a minute	6.25	6.25	6.25	30.79	4.86	8
Off peak delay	2.53	8.67	5.2	7.32	0	1
Seasonal Factor	1	1	1	1	1	1
Peakiness Index	0.5	1	0.5	0.5	0.5	0.5
Latent Demand	1.09	1.11	1.10	Not in use	Not in use	Not in use
ISUD value	0.60	22.25	3.58	84	Zero	0.92

The 2005 survey covered Zone B only. It found that most passenger waits were at the High St, Haverhill rank. It also found that demand showed high degree of peaking. The recommendation was to issue one plate, but the determination was removal of the limit.

The surveys in 2003 and 1997 in Zone A found very low and no significant unmet demand in that area. From 1997 to 2003 the levels of each of the components either reduced or stayed the same, suggesting better levels of service over time. For 2003, there was no off peak delay which meant that the overall ISUD index value was zero. Notwithstanding the undertaking of surveys it is understood that Zone A had removed its limit before 1997 when the DfT survey clearly states 'no limit'.

In the current analysis, using all available data, zone B has the highest index of significance of unmet demand. However, even this value is well below the cut-off level of 80 that signifies the observed unmet demand to be significant in terms of Section 16 of the 1985 Transport Act.

It should also be noted that much of the delay components for Zone B arise from waiting occurring at the Bury station rank. This should be removed from the evaluation since the additional requirements of this private rank restrict the number of vehicles that can service the rank. Further, the small number of train arrivals and general low level of demand make servicing this location effectively also very difficult.

It is interesting to note that, even taking out the station observations, there is more overall delay arising for passengers in zone B than in zone A, despite zone A having higher levels of demand. Further discussion of this occurs in the synthesis chapter below where other factors and consideration are drawn in to the equation.

8 Summary, synthesis and study conclusions

This Hackney carriage demand survey on behalf of West Suffolk Council has been undertaken following the guidance of the BPG and other recent case history regarding unmet demand and its significance.

Background and context

Most of the current legal context of taxi licensing remains based on the Town Polices Clause Act 1847 (TPCA) and section 16 of the 1985 Transport Act (hackney carriage) (s16TA) and the Local Government Miscellaneous Provisions Act 1976 (private hire vehicles and operations) (LGMPA), with some amendments recently applied, principally through applied sections of the Equality Act and the Deregulation Act. Despite much significant discussion on behalf of various parties, the most recent culminating in proposals to issue new Best Practice Guidance which remains 'imminent', the likelihood of major legislative reform remains potentially distant, leaving licensing authorities at the behest of various interpretations of a myriad of different aspects.

For the specific context of this study the detailed application of law to combination of authorities effectively provides a stark choice for the hackney carriage element which highly favours retention of hackney zones, if only on the basis that any decision to amalgamate cannot be reversed. This is symptomatic of legislation introduced effectively for once-off use in the 1974 reorganisations which has become enshrined and used many times over since without development.

This survey saw the bulk of research undertaken between June and September 2019, not long after the formal merger and creation of West Suffolk Council on 1st April 2019. The aim is to provide a database of evidence for a wider overall taxi licensing policy review during 2020. The context includes the fact that some functions that have bearing on taxi licensing matters (particularly school transport) remain with a smaller auxiliary authority rather than the new authority having full powers internally.

The brief sought to understand if there is any unmet demand for hackney carriages which is significant in either of the current zones A or B, and if not specifically if current demand for hackney carriages could be met by a total number of vehicles significantly less than the present total.

Further, questions about how the present hackney carriage fleet meets taxi accessibility needs were raised also requiring evidence.

2019 population levels were 179,800 for the authority albeit seeing about 64% in the Zone B, Bury and Haverhill part of the authority. Gentle growth is expected.

With regard to previous considerations of unmet demand, zone A had surveys in 1997 and 2003 both of which identified no unmet demand that was significant (but evidence shows there had been no limit since at least 1997), and zone B having limited in 1987 saw a study with rank work in 2005, a study Report in 2007 and a conclusion in 2008 that the limit be removed in favour of fully WAV style vehicles, albeit only stipulating M1 type approval and side loading.

Considering available statistics, on the vehicle front the largest growth in zone A was between 1994 and 1997, after which numbers have fluctuated but within a very tight band. This is usually symptomatic of either a numerical or strong quality control limit although we are only aware of the livery policy. For zone B, the impact of the limit removal is very clear in 2008 although the years following the initial impact saw a five year period when number dropped back a little, although there has now been steady hackney carriage vehicle growth since the low of 2013. Strangely the level of private hires in the area increased even more strongly at the time of the limit being removed, a counter experience to the normal reduction in private hire as hackney carriage plates are released.

For Zone A, hackney carriages are dominant in numbers and remain so. For Zone B, the reverse is true although overall current levels of growth in both fleets remain similar. However, a major increase in private hire vehicle numbers around the time the limit was removed from hackney carriage vehicle numbers increased the dominance of private hire in that area.

Zone A has only recently become fully dual driver based, whilst zone B last had differentiated drivers in 1994. Zone A driver numbers have tended to remain stable whilst those in zone B have been increasing as the level of vehicles has increased. Operator numbers follow a similar pattern.

Levels of WAV in zone A increased from 2013 to 2018 but have recently reduced (to 14%) whilst the limit removal and WAV policy in zone B has seen a general increase in the proportion of WAV there from 8% at limit removal to around 58% now. However, there are 25 vehicles with grandfather rights to remain saloon in zone B which implies the maximum for this zone can only be 66% unless people choose to relinquish their rights.

When vehicle, driver and operator statistics are presented for the full new authority area, both vehicle fleets now have the most vehicles ever seen with continued growth evident. Over time the proportion of the fleet that is hackney carriage has reduced from 53% to about a third now. Growth in driver numbers is less than the overall level of vehicle growth suggesting, as in most places, reduction in sharing of vehicles.

Combined statistics show a continual and gentle growth in levels of WAV vehicle proportions in both hackney carriage and private hire fleets. Operator numbers are also growing after a period of reduction to 2015.

Evaluation of the present industry structure suggests at July 2019 there were 731 different individuals involved in some way in providing licensed vehicle services (excluding operator base staff and any non-driving assistants). In total there were 397 private hire vehicles, 202 hackney carriages, 690 drivers and 101 operators. 367 individuals only drove and needed to rent a vehicle to be active. 60% of the hackney carriage fleet is in the hands of owners also able to drive. Whilst the average level of hackney carriage vehicles definitely available for rent is 40% this does vary by zone from 34% for zone A to 51% for zone B.

Two companies that both operate hackney carriage and private hire account for 21% of the entire area vehicle fleet, excluding independently owned vehicles that link to them. However, about two thirds of the operators appear to be public facing suggesting a large number of small companies remain despite the existence of the larger fleets. The analysis suggests there are different operating practices between zones A and B, with zone A hackney carriage operation based on several small agglomerations of vehicles whilst zone B is more company and mixed fleet based.

Rank observations

The situation regarding ranks in the area has now been stable for some while. There is at least one rank in each of the four large settlements and all but one rank is well-marked (with St Andrews Street Bury being the worst affected by private parking and being the one hardest to mark properly). The active ranks reinforce their presence by tending to have vehicles there at most times when there are people around.

A key factor in the area is the relatively long distances between the four settlements. Some inter-settlement connections use minor roads whilst one key route is often very congested. This tends to imply that each settlement has its own supply of vehicles focussed on demand in their area.

Given the lack of recent information about rank usage across the authority, a wide review was undertaken of all known active ranks over an extended period. 58% of hours observed saw no hackney carriage activity, with 15% seeing light levels of activity. There were two hours in the early hours of Friday, one in the early hours of Saturday and three in the early hours of Sunday when there was no hackney carriage rank activity in the area – or 8% of the hours within the 75-hour observation window covering the busiest expected periods over Thursday, Friday, Saturday and Sunday early mornings. This is very good coverage given the perceived rural nature of the authority.

The high-level review identified the Fred Archer Way rank in Newmarket as being more of a 'rest rank' than one used by passengers. It confirmed no real use of the council provided feeder at Bury station and only minor usage of the Brook Service Road rank in Haverhill by passengers, though again many vehicles spent time waiting there. St Andrews Street Bury also only saw passenger usage from late evening to early morning on Fridays and Saturdays with some possibility that trips made from here were booked rather than pure rank activity. The Mildenhall rank had the lowest level of active hours from the ranks that were active for significant periods, followed by the Bury station (private) rank. The White Hart rank in Newmarket was identified mainly as a feeder to the main rank there near W H Smith. For the record, the Market Street Haverhill rank was believed to be little used and not observed either on the site visit or during the main survey.

In terms of all events observed at ranks, 37% were at Newmarket High Street W H Smith rank, 24% at Bury Cornhill, 17% at Newmarket High Street feeder and from 6% to 2% at each other location.

90% of all vehicle movements observed at ranks were legitimate West Suffolk hackney carriages. 2% were local private hire vehicles and 6% private cars. 1% each were goods vehicles, out of town or out of zone licensed vehicles and emergency vehicles.

St Andrews Street Bury saw the highest issue with non-hackney carriage vehicle use of the spaces. 40% of vehicle movements here were private cars followed by 15% local private hire and 7% goods vehicles. Part of the issue here is the difficulty to provide road markings, although low usage by hackney carriages (given the low footfall) also contributes to the potential for abuse.

In terms of estimated passengers, the Newmarket W H Smith main High Street rank sees 44% of all estimated West Suffolk passenger demand. Bury Cornhill sees 35%. All other ranks see between 7% and 1% of demand. Mildenhall sees 5% and Haverhill 1%. Bury Station sees 6% and the High Street feeder in Newmarket 7%.

Interestingly, on a zone basis, the main rank in each zone sees 78-80% of all passenger demand, with the second largest rank in each location seeing 13% (High Street feeder, zone A and Bury Station, zone B). The Newmarket High Street feeder, Bury Station and Mildenhall ranks see relatively similar levels of patronage, albeit around 300 passengers per week. The two other used ranks see less than 100 passengers per week.

The patronage of Bury Cornhill rank is very similar to the estimated number of weekly passengers estimated there in the 2005 survey. Bury Station usage has halved, St Andrews Street has increased threefold (but still not a very high level of usage), and Brook Service Road in Haverhill saw just 20% of the level observed in 2005.

Across the area, demand for hackney carriages rises from Thursday to Friday to Saturday. Highest flows tend to be earlier in zone B than zone A, with zone A seeing a strong peak in the early hours of Sunday morning, with another peak around midnight also matched by the peak in zone B.

With respect to unmet demand observed, zone A had just 3% of hours with unmet demand, affecting less than 2% of passengers. This is despite that area having peaky demand. Zone B saw a similar 3% of hours observed but 4% of all passengers affected. However, the main issues here were at the station rank which is private and also sees bunching of demand from having only a small number of train arrivals per hour making demand notoriously hard to meet effectively.

True unmet demand occurred at Cornhill Bury when the highest passenger flow occurred – but this only affected one single hour.

The overall total estimated passenger level is 5,303 for the full area. Average vehicle occupancy is 1.6 passengers per vehicle suggesting 3,314 vehicle departures in an average week. With 202 hackney carriages this gives just over 16 trips per vehicle per week, or 2.3 trips per day. This level is very unlikely to provide sufficient remuneration hence the need for contract and private hire work for most hackney carriages. Further discussion follows in the synthesis section.

In summary, the busiest and most typical rank in the area is High Street Newmarket which is the only 24/7 rank in the area. It is supported by a feeder rank and meets high demand levels incredibly well. Bury Cornhill tends to operate in daytimes until late evening but demand there can be more 'sawtooth' in nature with peaks every three hours that can make demand harder to meet. Bury Station rank reacts to train arrivals, the low frequency of which hinders the ability to meet demand effectively. Mildenhall rank operates over less hours and at a much lower level of demand. St Andrews Street is mainly active on weekend evenings. Low demand at Haverhill seems to have led to most demand being met by bookings although the Brook Service Road rank does seem to be a key place that vehicles come to wait to receive bookings.

Sample vehicle activity checks on the Saturday found Newmarket main rank using 59% of the fleet. Other estimates suggest Mildenhall uses about 4% of the zone A fleet. This level of activity met demand well with the proportion of fleet active tending to rise through the day (but only 40% were observed in the last period, although this was the highest overall proportion for the periods covered).

For zone B it was estimated that about 8% of the fleet service Haverhill, 4% service Bury Station and 31% Cornhill rank (with 24% servicing the busiest period). This suggest a much higher level of spare capacity in the zone B fleet even allowing for those mainly working weekdays.

Further discussion of this occurs in the synthesis section.

On street public views

57% of the total West Suffolk interviewees responding to the question said they had used a licensed vehicle in the area in the last three months. The range split by zone was not great – 54% for zone A and 60% for zone B. In fact, there was a bigger difference between the values quoted for the places within zone A – with Mildenhall saying just 38% and Newmarket being very close to the overall average.

Using stated frequencies, a low estimate of 1.5 trips per person per month was obtained. 15% of this level (0.2 trips per person per month) were by hackney carriage. 33% said they usually got licensed vehicles from a rank whilst 3% said they got them by hailing. 53% telephoned, 5% used free phones and 5% used apps. Again, Mildenhall and Haverhill had much lower levels of usage (0.9 and 0.7 trips per month for all licensed vehicles).

Quoted rank usage was highest in Newmarket (42%) then Bury (31), Mildenhall (23) and Haverhill (22).

Obtaining vehicles by free phone or app was focussed on zone B, Bury and Haverhill, with effectively no use of either in zone A.

Despite a high number of responses, only three companies that people phoned received more than 7% of the total responses, obtaining 20%, 15% and 13% of mentions. Eight others scored between 2 and 7%. Bury obtained the highest level of app use, mainly for a national company (54%) but with a local company also quoted as using an app (17%).

9% could not remember seeing a hackney carriage in the area, but a relatively low 25% said they could not remember when they last used one.

35% were aware of the main Bury rank at Cornhill with 34% aware of Newmarket High Street. Mildenhall bus station was third with 14% and Haverhill obtained 3% (but stated as High Street). 55% of those naming ranks said they used them.

Overall experience of a wide range of aspects of recent licensed vehicle trips gained ‘very good’ response, even with regard to price. The only exception was that there appeared to be an overall issue with all aspects of the service in Haverhill being seen as less good (but not poor or very poor).

In terms of matters that might encourage more hackney carriage usage, ability to have more they could phone for came top with 50% of responses.

Only moderate need was identified for adapted licensed vehicles – with a focus on WAV style, with a stronger need in zone B, where the actual proportion is already highest.

Latent demand for the area was estimated at 5.6% with most giving up waiting at the Cornhill rank in Bury. There appeared to be an expectation that vehicles could be hailed area-wide. Some mention was made of shortages of vehicles on race days.

73% felt there were enough hackney carriages in the area, whilst feeling safe scored 99% in the day and 97% at night, all very good and positive responses.

Just 37% would choose electric powered vehicles but only if it had no impact on price. Just 3% were willing to pay up to 10% more.

60% of those responding did not favour any livery.

54% favoured use of credit cards, but again only if it did not affect price although 8% said they would use them for every journey.

Key stakeholder views

Most use of licensed vehicles was through bookings, although a night venue was aware of the rank that was used by its customers. The general lack of response suggested there were very few issues with the service provided.

Trade views

There was in the order of a 7% response to the all-trade survey. 59% were from those saying they drove hackney carriages. The split of the hackney carriage respondents by quoted zone almost matched the proportion of vehicles in each zone- with 65% of hackney responses being from zone A.

Whilst average levels of service were similar, that for private hire was higher at 14 years (hackney carriage 12 years). Hackney carriage on average worked marginally more days than private hire and more hours (41 compared to 37) but overall the values were of the same order of magnitude.

7% said they arranged their work to avoid disruptive passengers and 18% avoided heavy traffic but most chose when to work to suit their personal preferences.

89% owned their own vehicle and 83% accepted pre-bookings, mainly through companies. One of these gained 31% of responses and two others obtained 9% each, with the rest shared between single responses, many of which appeared to be hackney carriage.

49% said they serviced Newmarket ranks, 29% Bury and 9% Mildenhall.

A third said their main method of getting fares was from ranks and a third from bookings, with 9% from contracts and 9% from using an app. 2% said hailing with others saying a mix. Very few obtained all their work from a single source, even for bookings based drivers.

85% of those responding to the question, therefore including many private hire drivers, felt a limit should be applied to hackney carriage vehicle numbers. Those supporting the limit suggested it would maintain quality of service and reduce pollution and congestion. 96% felt there were enough hackney carriages in the area.

60% felt fares were about right with 22% wanting an increase.

51% said the zones should be retained with 47% thinking they should be merged.

Various other concerns were raised, one person pointing out that the need for a new vehicle was restraining entry to the trade whilst another was concerned about the application of the two-tone livery across the full hackney carriage fleet.

Formal evaluation of significance of unmet demand

Neither the two separate zones, nor the full authority area see unmet demand that can be counted as significant according to Section 16 of the 1985 Transport Act.

The highest index value, and the closest to the cut-off of 80, is zone B where the value is 22.25. The main component of this is off peak delay, although average passenger delay is also highest at 0.37 minutes compared to the 0.07 for zone A. The overall delay factor is the same for both zones. When combined, the value of the index reduces to 3.58, compared to the zone A value of 0.6.

The zone with the lowest ISUD index is the one with the largest number of hackney carriages, but also has the highest demand level in any hour, and the highest overall demand, suggesting an even better performance for that area.

The current index values are all lower than those identified from previous studies, suggesting improved service at this point in time compared to any previous evaluations undertaken.

Consideration of accessibility of fleet

Whilst the existence of two large companies is positive in terms of the ability of those wanting to phone for specific vehicle types to get maximum availability from one or two calls, the large number of smaller players particularly on the hackney carriage side and more so in Zone A, is counter to this giving people the need to search through large volumes of numbers to get appropriate vehicles where relevant. Whilst the existence of the WAV list reduces this for those needing the vehicle types listed therein, other needs might best be met by non-WAV style vehicles for whom the search process is therefore more complicated.

Review of the current list of wheel chair vehicles shows there are a range of different vehicle types which people can choose from to suit their specific needs. However, the list only provides operator names for private hire and simply vehicle details for hackney carriage. This makes planning ahead or booking – the preferred choice for most disabled persons – very difficult. At ranks, people will have a further difficulty of having to take whichever vehicle makes itself available. The issue if a person has to take the first vehicle in the queue must also be considered and the option for a person with a specific need to avoid this provided if necessary. Further, people need to be given the right to choose a vehicle on the basis of their specific physical need without recrimination from drivers of vehicles they are unable to use. This may need further thought.

The detailed rank evaluation found an estimated 26% of vehicles observed were WAV style, very similar to the 25% in the fleet. However, only two people were observed actually using wheel chairs to access vehicles at ranks, one in Mildenhall and one in Newmarket. A further 31 people were observed with other forms of disability receiving assistance from drivers, mainly at Cornhill, Bury.

Synthesis and conclusions

Hackney carriages are active at ranks across the area for nearly all hours. However, this is dependent on overall demand at each location with only the main Newmarket rank providing a 24/7 facility. All other active ranks have lesser operating periods outside of which people would need to make bookings to use hackney carriages. This is more true for the two smaller centres, where the level of choice is also reduced by the proportion of the fleet actually operating regularly in that location.

Both overall levels of rank usage and the overall profiles of demand through the week suggest little overall difference between hackney carriage rank activity in the two zones and would tend to a relatively unlikely major shift of vehicles between settlements were the zones put together. The only point at which there is more demand in a typical week relates to the early hours of Sunday in Newmarket – a scenario that seems very well serviced in our observations.

On the counter side, the distances between the four settlements which reduces the likelihood of major moves between the two zones also dissuade hackney carriages from taking fares cross zone with their need to return empty – were the zones amalgamated this would no longer be the case.

Further, there may be times, such as race days, where zone A may have much greater need of vehicles than the current fleet there can meet – and the same could be true for zone B.

At the present time there tends to be four almost separate operations across the area with only Newmarket and Mildenhall seeing some element of inter-working. As is also the case in Cornwall zones, the differences between the two places within each zone is actually greater than the differences between the two zones. This gives further evidence that negative impacts of combining to one area are unlikely.

The evaluation of performance provided by the test of significance of observed unmet demand suggests both areas lack any unmet demand that is significant. However, ironically the area with the busiest peak sees the best performance based on the index, with Zone B, which has overall marginally lower demand and less peaking, seeing poorer performance according to the index, although much of this relates to the lumpy demand and other impacts of the private station rank, although even demand at the main Bury rank also is 'lumpier' than normal for unknown reasons, which again militates against easy provision of adequate service.

The relative lack of unmet demand does provide the option that vehicle numbers could be limited in either zone, or in aggregate were this to be felt to provide benefit. Principal benefits from limiting numbers are higher certainty of income for the limited vehicle number, better opportunity for customers to get to know a more fixed number of vehicles (driver numbers cannot be limited), the added value provided by having an excess value attached to the vehicle, which can be used to encourage investment in the fleet, and more stability than the potential for new entrants at any time can provide.

It also provides the option that a limit less than the current numbers of vehicles could be set. However, the present situation which has been set more or less by market forces over at least ten years without quantity regulation, currently provides an excellent service and it would be prudent to retain this element of the status quo particularly if consideration is being given to amalgamating zones. At least one authority (Chesterfield) has tried to have a limit below the current number, but found actual reductions in numbers occurred much more slowly than was expected. The other option, used in Birmingham, is a moratorium on new licences, which is more effective, although this does also work counter to any aims to increase either wheel chair style vehicles or more environmentally friendly vehicles by keeping the door open for those wishing to invest in such developments by entering the trade.

There do not seem to be any strong evidence of high level of over-provision of vehicles at the current time, such as strong complaints of over-ranking nor of excessive hours being worked to make a living as has been found in other areas. We would therefore conclude that consideration of limits lower than the current level would not be of any benefit at this point in time, with much more important matters needing to be addressed, as discussed below.

Perhaps the biggest current difference between the two zones is the fact that zone A has liveried hackney carriages whilst zone B has no such livery. The public seem to prefer no livery whereas the trade is more equally split on this matter. The strongest public support for the livery is in Newmarket but the lowest support in Mildenhall, both in the liveried zone. Views are more consistently against in Bury and Haverhill (with 25% and 22% respectively saying yes to a livery there).

Other elements of the public views gave no strong evidence of benefit either way, with the level of people not remembering seeing a hackney carriage only marginally higher in the un-livered zone (11%) compared to the livered (8%), with again more difference between the two locations within each zone than between the two zones. The highest level of not remembering seeing a hackney carriage was 27% of respondents in Mildenhall – a place that has liveried vehicles whilst the lowest percentage was 1% in Newmarket itself, but followed by 2% in Haverhill and 14% in Bury.

The pros and cons of this will need to be discussed with trade and public alike in much more depth – as this has bearing on the choice of a single zone or two if views in the two current areas are irreconcilable. However, there would be much more benefit in a common West Suffolk livery which could occur with or without the zone amalgamation as it would give a corporate ethos to the fleet.

The largest concern arising from this review is why the level of hackney carriages in zone A has remained very similar effectively since 2008 whilst the level of wheel chair accessible vehicles has failed to grow anywhere near as significantly as that in zone B. Nor has there been any additional growth on the private hire side, in fact the opposite until the last few years – even when growth has only been modest.

Development on the disability side would need identification of key users with disabilities regularly using the service and willing to work with the Council and trade to take the service offer forward.

Another matter of major concern is the lack of any concerted trade representation or working together. Our experience is that the best service to the public tends to occur where members of the trade work corporately together, often using the benefits of national association memberships to enable high collaboration and focus to be agreed. This usually encourages significant abilities to solve issues and develop trade than occurs when everyone is seeking their own aims. It helps balance company and individual viewpoints and develops consensus amongst variety. It focusses the trade on increasing overall status and demand for licensed vehicles in total against use of less sustainable modes particularly the private car.

Given the need to develop an all-West Suffolk licensed vehicle operation with important focus on developing service to all groups of potential customers, particularly those with disabilities, whilst also moving forward the sustainable nature of the trade, a corporate trade view is essential. The issue of zoning and revision of overall policy is a good opportunity to develop this.

9 Recommendations

On the basis of the evidence gathered in this Hackney carriage demand survey for West Suffolk 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 West Suffolk Council licensing area, both for the two separate zones or for the area as one zone.

The committee could therefore consider applying limits to the number of hackney carriage vehicles in one, both or the combined zone. This tool should be kept in mind if it was useful in helping the move towards a single zone with a limit compared to two zones without.

Going beyond application of a limit to putting a lower limit in place to see reduction in hackney carriage vehicle numbers in either zone or across the whole area does not currently seem of merit.

One possible benefit of a limit might be use of the extra value it implies to plates to encourage transfer to more accessible and environmentally friendly vehicle types and operating practices.

While it seems on balance amalgamation of the two zones might be the best way forward, there also seems to be strong value in that merger occurring over an extended period, perhaps up to five years, to allow careful thought and consideration of the exact details of the future hackney carriage fleet, not least the livery question. Support for this comes from the success of this strategy in Shropshire compared to the difficulties arising from immediate agglomeration that occurred in Durham. A strong benefit would also be the development of a corporate trade body working together visibly to enhance the service provided further.

Such a time period would also allow the option to reverse the movement towards agglomeration were any evidence to come forward in that time that it would be a negative move. It would be prudent for key parties to agree the red lines that might push people towards a contrary decision – such as any evidence arising that suggested vehicles might be gearing up to focus their service in one part of the other zone. There will also need to be strong honesty and working between the trade elements in the discussion that occur.

Consultation must not just focus on the livery question but also discussion how the fleet might move towards a higher level of wheel chair provision more quickly as well as how new policies can hasten the development of the fleet towards more sustainable and environmentally friendly vehicles and operating manners.

An example might be better levels of discussion between individuals and operators to maximise reduction of return empty trips – something that could occur now within the current zones as well as be planned for when the amalgamation is in place. Further, discussion is needed how the task of identifying the most appropriate vehicle for a persons' needs, both by booking and at ranks, might be expedited.

Another example might be tripartite council / trade / user workshops whereby all key industry players could identify and develop offer based on identified issues and needs. Such days might include demonstration of vehicles to customers as well as other matters such as demonstration of liveries or new vehicle types or equipment. It could include discussion of possible single point access options for people with specific needs that would ensure their particular licensed vehicle requirements could be promptly and regularly met, enhancing their ability to live as normal as possible lives whilst also being a benefit to the trade operations.

A list of ranks needs to be available within the internet documentation for the licensing section, perhaps in the policy document, perhaps separately, and preferably with a map available to the public.

Discussion needs to occur as to how the St Andrews rank can be better marked and distinguished and enforcement against abuse increased.

Consideration should be given to setting up user and key stakeholder interaction, and a confidential feedback method possibly provided.

Appendix 1 – Industry statistics

			West Suffolk - full area								
	hcv	phv	lv total	hcd	phd	dd	total d		Ops	% hcv WAV	% phv WAV
1994D	137			397				1994D			
1997D	156	139	295	58	206	243	507	1997D			
1999D	162	168	330	208	3	300	511	1999D	42	1	
2001D	163	203	366	195	21	332	548	2001D	56	4	
2004D	165	194	359		8	451	459	2004D	39	2	
2005D	166	197	363	2	15	478	495	2005D	39	7	
2007D	166	197	363	2	15	478	495	2007D	39	7	
2009D	185	297	482		29	503	532	2009D	88	11	
2010N	184	366	550		26	532	558	2010N	85	11	1
2011D	179	359	538		23	561	584	2011D	81	15	0
2012N	180	373	553		20	572	592	2012C	78	12	4
2013D	180	311	491		16	583	599	2013D	75	17	8
2014N	182	328	510		14	585	599	2014N	72	20	13
2015D	189	348	537		11	587	598	2015D	68	21	9
2017D	194	375	569		7	632	639	2017D	89	26	15
2018D	200	377	577		6	664	670	2018D	95	29	4
2019D	199	385	584			664	664	2019D	97	28	4
2019C	202	397	599			690	690	2019C	101	30	18

			Forest Heath								
	No quantity control, date started unkown										
	hcv	**phv**	**lv total**	**hcd**	**phd**	**dd**	**total d**		**Ops**	**% hcv WAV**	**% phv WAV**
1994D	**101**			**240**							
1997D	**121**	**4**	**125**			**243**	**243**	**1997D**			
1999D	**124**	**18**	**142**	**208**	**3**		**211**	**1999D**	**12**		
2001D	**127**	**29**	**156**	**195**	**21**		**216**	**2001D**	**16**	**3**	
2004D	**128**	**27**	**155**		**8**	**162**	**170**	**2004D**	**15**		
2005D	**129**	**30**	**159**	**2**	**15**	**189**	**206**	**2005D**	**15**	**7**	
2007D	**129**	**30**	**159**	**2**	**15**	**189**	**206**	**2007D**	**15**	**7**	
2009D	**122**	**56**	**178**		**29**	**184**	**213**	**2009D**	**26**	**11**	
2010N	**126**	**51**	**177**	**-**	***26***	***183***	**209**	**2010N**	***25***	**10**	**10**
2011D	**126**	**43**	**169**		**23**	**182**	**205**	**2011D**	**24**	**10**	**2**
2012N	**126**	**42**	**168**	**-**	***20***	***183***	**202**	**2012C**	***23***	**10**	**2**
2013D	**127**	**38**	**165**		**16**	**183**	**199**	**2013D**	**21**	**9**	**3**
2014N	**127**	**39**	**166**	**-**	***14***	***183***	**196**	**2014N**	***19***	**11**	**3**
2015D	**128**	**34**	**162**		**11**	**182**	**193**	**2015D**	**16**	**13**	**3**
2017D	**131**	**41**	**172**		**7**	**187**	**194**	**2017D**	**19**	**14**	
2018D	**129**	**44**	**173**		**6**	**199**	**205**	**2018D**	**19**	**17**	
2019D	**134**	**41**	**175**			**209**	**209**	**2019D**	**19**	**16**	
2019C	**128**	**46**	**174**			**186**	**186**	**2019C**	**19**	**14**	**2**

			St Edmundsbury								
	quantity limited 1987 to 2008 then all new = WAV										
	hcv	**phv**	**lv total**	**hcd**	**phd**	**dd**	**total d**		**Ops**	**% hcv WAV**	**% phv WAV**
1994D	**36**			**157**				**1994D**			
1997D	**35**	**135**	**170**	**58**	**206**		**264**	**1997D**			
1999D	**38**	**150**	**188**			**300**	**300**	**1999D**	**30**	**3**	
2001D	**36**	**174**	**210**			**332**	**332**	**2001D**	**40**	**8**	
2004D	**37**	**167**	**204**			**289**	**289**	**2004D**	**24**	**8**	
2005D	**37**	**167**	**204**			**289**	**289**	**2005D**	**24**	**8**	
2007D	**37**	**167**	**204**			**289**	**289**	**2007D**	**24**	**8**	
2009D	**63**	**241**	**304**			**319**	**319**	**2009D**	**62**	**11**	
2010N	**58**	**315**	**373**	**-**	**-**	**349**	***349***	**2010N**	***60***	**14**	
2011D	**53**	**316**	**369**			**379**	**379**	**2011D**	**57**	**28**	
2012N	**54**	**331**	**385**	**-**	**-**	***390***	**390**	**2012C**	***56***	**15**	**4**
2013D	**53**	**273**	**326**			**400**	**400**	**2013D**	**54**	**36**	***9***
2014N	**55**	**289**	**344**	**-**	**-**	***403***	**403**	**2014N**	***53***	**42**	**14**
2015D	**61**	**314**	**375**			**405**	**405**	**2015D**	**52**	**39**	**10**
2017D	**63**	**334**	**397**			**445**	**445**	**2017D**	**70**	**51**	**17**
2018D	**71**	**333**	**404**			**465**	**465**	**2018D**	**76**	**51**	**4**
2019D	**65**	**344**	**409**			**482**	**482**	**2019D**	**78**	**52**	**5**
2019C	**74**	**351**	**425**			**504**	**504**	**2019C**	**82**	**58**	**20**

Appendix 2 – Industry Structure

	Records	Drivers	Hackney A	B	phv	People	Ops
Hackney only fleet:							
Hackney multi owner (2), drive, zone A	18	9	18			9	
Hackney multi owner (2), drive, zone B	4	2		4		2	
Hackney multi owner (2), drive, zone B, and operator	2	1		2		1	1
Hackney multi owner (3), drive, zone A	6	2	6			2	
Hackney multi owner (4), drive, zone A	8	2	8			2	
Hackney multi owner (6), zone A	6		6			1	
Hackney owner, zone A	16		16			16	
Hackney owner, zone B	3			3		3	
Hackney owner and driver, zone A	65	65	65			65	
Hackney owner and driver, zone B	25	25		25		25	
Hackney owner and driver, zone B, and operator	2	2		2		2	2
Mixed vehicle fleet:							
Mixed fleet, 11 hcv Area B, 56 ph, drive and 2 operator licences	67	1		11	56	1	2
Mixed fleet, 15 hcv Area B, 43 ph, drive and operator	58	1		15	43	1	1
Mixed fleet, 1 hcv Area B, 7 ph, drive and operator	8	1		1	7	1	1
Mixed fleet, 7 hcv Area b, 2 ph, drive and operator	9	1		7	2	1	1
Mixed fleet, 1 hcv Area B, 2 ph, drive and operator	3	1		1	2	1	1
Mixed fleet, 1 hcv Area B, 2 ph, drive	3	1		1	2	1	
Mixed fleet, 1 hcv Area B, 1 ph, drive	2	1		1	1	1	
Mixed fleet, 1 hcv Area B, 1 ph, drive and operator	2	1		1	1	1	1
Mixed fleet, 1 hcv Area A, 2 ph, drive and operator	3	1	1		2	1	1
Mixed fleet, 2 hcv Area A, 2 ph, drive	4	1	2		2	1	
Mixed fleet, 2 hcv Area A, 1 ph, drive	3	1	2		1	1	
Mixed fleet, 3 hcv Area A, ph	4		3		1	1	
Mixed fleet, 1 hcv Area A, 1 ph, drive	2	1	1		1	1	
Private hire fleet:							
Private hire owner and driver	116	116			116	116	
Private hire owner and driver and operator	47	47			47	47	47
Private hire owner and operator only (no driver)	1				1	1	1
Private hire multi owner (2), drive and operator	20	10			20	10	10
Private hire multi owner (3), drive and operator	12	4			12	4	4
Private hire multi owner (5), drive and operator	5	1			5	1	1
Private hire multi owner (6), drive and operator	12	2			12	2	2
Private hire multi owner (14), drive and operator	14				14	1	1
Private hire multi owner (16), drive and operator	16				16	1	1
Private hire multi owner (2) and drive	16	8			16	8	
Private hire multi owner (5) and drive	5	1			5	1	
Private hire multi owner (2)	4				4	2	

Private hire multi owner (3)	3				3	1	
Private hire owner only, single vehicle	5				5	5	
Drive only	367	367				367	
Drive and operator	14	14				14	14
Operator only	9					9	9
	989	690	128	74	397		#
		Total H		202			
		Total veh			599		

Appendix 3 – List of ranks

N.B. – all ranks are 24-hour unless stated

Zone A – Newmarket and Mildenhall

High St, Newmarket, near WH Smith with feeder near White Hart

Fred Archer Way, Newmarket

Bus Station, Mildenhall

Zone B – Bury St Edmunds and Haverhill

Cornhill, Bury, including feeders

St Andrews Street, Bury

Bury Station – private rank, with council provided feeder in Station Hill layby operating 20:30 to 05:30 only.

Brook Service Road, Haverhill

Market Street, Haverhill

Appendix 4 – Timetable of rank observations and summary of usage

Please see separate document

Appendix 5 – Detailed rank observation results

Please see separate document

Appendix 6 – Detailed on street interview results

Please see separate document

Appendix 7 List of Stakeholders consulted

Key consultee	Response
Supermarkets	
Sainsbury's, Haverhill	Y
Waitrose, Newmarket	N
Tesco Extra, Newmarket	N
Sainsbury's, Mildenhall	N
Asda, Bury St Edmunds	N
Sainsbury's, Bury St Edmunds	N
Tesco, Haverhill	N
Hotels	
The Abbey Hotel, Bury St Edmunds	Y
Riverside House Hotel, Mildenhall	Y
Sturmer Hall, Haverhill	Y
The Angel Hotel, Bury St Edmunds	N
Best Western Heath Court, Newmarket	R
Bridge Hotel, Brandon	R
Restaurants / Cafes	
Bill's Bury St Edmunds Restaurant	Y
The Tack Room, Newmarket	N
Spice Lounge Restaurant	N
Prezzo Italian Restaurant, Haverhill	R
Entertainment	
Suffolk Regiment Museum, Bury St Edmunds	Y
Newmarket Racecourses	N
Mildenhall Museum	N
Cineworld Haverhill	N
Brandon Leisure Centre	N
Public Houses	
Dog and Partridge, Bury St Edmunds	Y
Kings Arms, Bury St Edmunds	Y
White Hart, Newmarket	N
Half Moon, Mildenhall	N
Flying Shuttle, Haverhill	N
Night Clubs	
Heaven Gentlemen's Club, Newmarket	Y
The Ark, Newmarket	Y
Unique Bar, Newmarket	N
Flex nightclub, Bury St Edmunds	N
Bar Vu, Haverhill	N
Hunter Club, Bury St Edmunds	R
Innocents, Newmarket	Gone

Other key stakeholder groups	
Newmarket Community Hospital	N
West Suffolk Hospital	R
Police	N

Key:

N – no response despite various attempts

Y – response

R – refused to respond for various reasons