



South Ribble Council
Review of Licensed Vehicle Policy
March 2019

Executive Summary

This review of licensed vehicle policy has been undertaken on behalf of South Ribble Council following the guidance of the April 2010 DfT Best Practice Guidance document. 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 what policies should be revised in regard to vehicle policy. 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. TO BE COMPLETED WHEN MAIN REPORT ACCEPTED

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1 General introduction and background

South Ribble 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. 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 allow them to review, with relevant information, the current policies in regard of licensed vehicles in this area.

Current hackney carriage, private hire and operator licensing is undertaken within the legal frameworks first set by the Town Police Clause Act 1847. This has been amended and supplemented by various following legislation including the Transport Act 1985, Section 16 in regard to hackney carriage vehicle limits, and by the Local Government Miscellaneous Provisions Act 1976 with reference to private hire vehicles and operations. Many of the aspects of these laws have been tested and refined by other more recent legislation and more importantly through case law.

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

The legislation around licensed vehicles and drivers has been the subject of many attempts at review. The limiting of hackney carriage vehicle numbers has been a particular concern as it is often considered to be a restrictive practice and against natural economic trends. The 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 All-Party Parliamentary Group review concluded in 2018 and the February 2019 response to this and associated consultation from the Department for Transport. None of these resulted in any material change to the legislation involved in licensing although the DfT response suggests there could be some legislative change forthcoming.

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

The Government response to the APPG and associated consultation focusses on improving some matters principally related to passenger safety. It also considers some matters related to enabling Clean Air Zone vehicle charging regimes to be able to apply to the full English fleet of licensed vehicles. There is also mention that the DfT encourages licensing authorities to demonstrate how they will use their current powers to improve provision of wheel chair accessible hackney carriages if their level of such provision is 5% or less.

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. This is presently the case in South Ribble.

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. This has not been the case in South Ribble, and a wide range of WAV style are permissible.

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. This is certainly not the case in South Ribble, and the highest number of WAV are actually in the private hire fleet, albeit in reality not available to the general public as they are principally operated to meet contractual needs from Lancashire County Council, meaning the vehicles actually service many areas beyond South Ribble.

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. South Ribble has a list of WAV, updated for this project to the end of January 2019.

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.

These 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.

2 Local background and context

Key dates for this review of licensed vehicle policy for South Ribble Council are:

- appointed CTS Traffic and Transportation on 18 December 2018
- in accordance with our proposal of November 2018
- as confirmed during the inception meeting for the survey held on 10th January 2019
- this survey was carried out between January and February 2019
- On street pedestrian survey work occurred in late January 2019
- A draft of this Final Report was reviewed by the client during March 2019

The authority has a current population of 110,634 using the 2019 estimates currently available from the 2016 estimates from the 2011 census data. In terms of background council policy, South Ribble is a Borough Council with highway and transport powers principally at the County level with Lancashire. However, with respect to ranks, the County works in conjunction with the district on establishing ranks as part of an overall parking strategy or review, but the local district is also able to provide taxi bays under their special provisions which allow such to be provided under local authority auspices with consent from the County. Typical options use bays with limited daytime waiting for ranks at night, very helpful when new night venues open and need urgent action on rank provision. As far as we are aware, these options have not been used recently in this area. The County Council confirmed the county provision of ranks (see Chapter 3).

The Council area has a very varied population and levels of prosperity. One area is the seventh most affluent ward of the 8,000 North West wards, whilst another is 180th worst (Broadfield) and another 370th worst (Seven Stars). There are a large number of very small settlements and several other moderate sized settlements. A lot of economic activity is related to Preston, with a lot of people regularly visiting Preston either for work, leisure or personal business.

Whilst many have the option of travelling to Preston and various other destinations by train, there are just three stations in the Borough. The highest level of use is for Leyland, which was 1,018th busiest in England, Scotland and Wales public stations in the year ending March 2018. This is out of a total of 2,563 stations listed. Some 395,928 persons were estimated to enter or exit the station in that period, a drop of 5% since the previous year. This station has three trains per hour per direction although these are not regularly spaced. This reduces the opportunities at the station to a level that reduces the potential for regular waiting by hackney carriage vehicles.

Destinations serviced include Preston, Blackpool North, Manchester Piccadilly, Liverpool and Manchester Airport and various intermediate stations including Wigan, Chorley, Bolton, St Helens and Huyton, mostly at hourly frequency apart from Wigan which sees two trains per hour.

Bamber Bridge and Lostock Hall are both located on the Preston to Colne route, and are 1,780th and 2,025th in order, with 88,720 and 11,834 entries and exits per year in the last available information. Whilst Bamber Bridge had also seen a fall of 1% over the last year, Lostock Hall saw an 11% gain in the same year. Both stations basically have an hourly service.

Only Leyland has an actual rank provided directly outside the station exit that is closest to the town centre. The low levels of demand and low frequency of services at the other two locations suggest they would only ever be serviced by people making phone calls or bookings in various ways.

It is understood that there are special arrangements in place to transfer visitors to the two HMP establishments in the area from Leyland station although no further information was obtained.

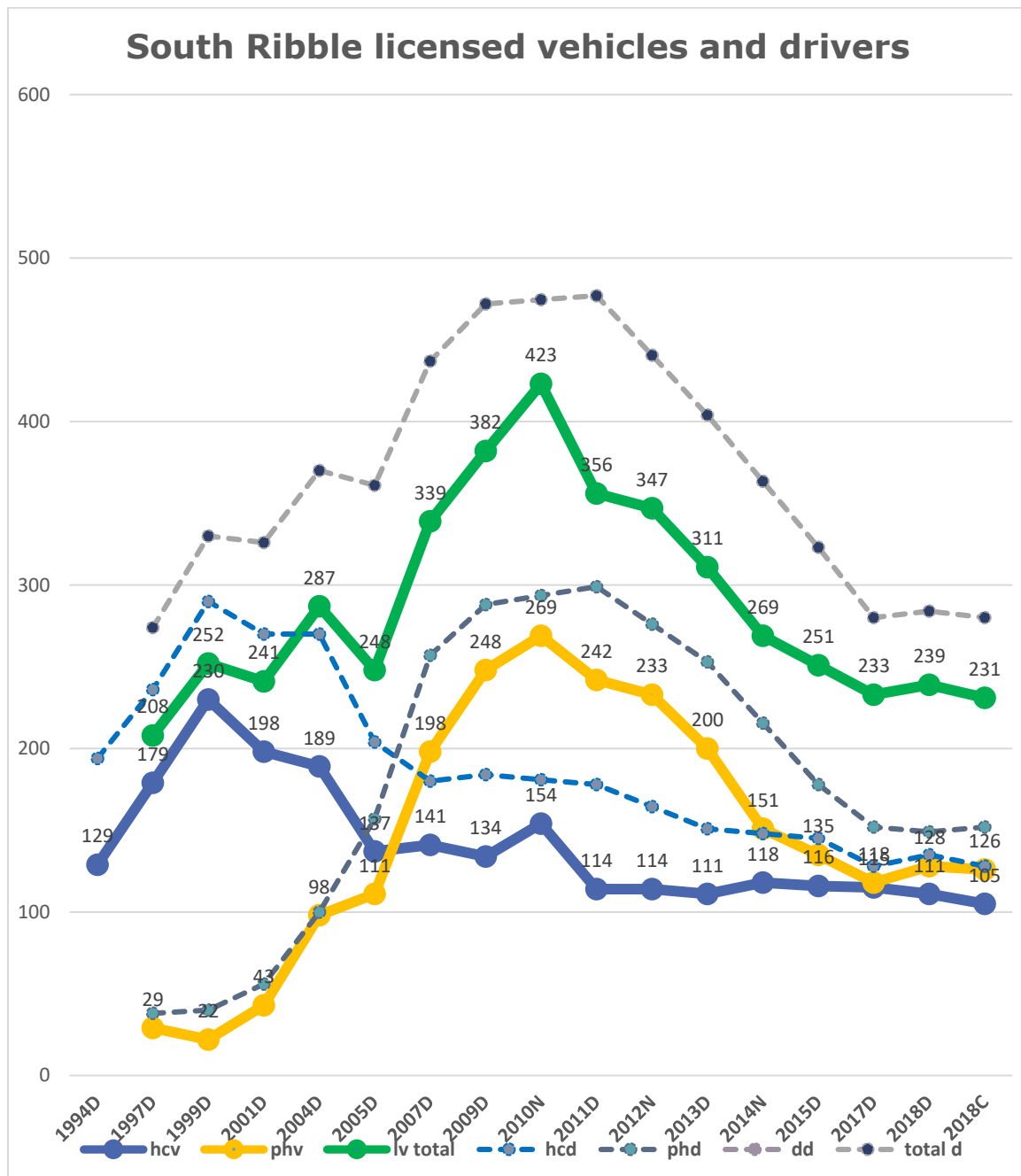
Lancashire County Council undertakes a wide range of school and social services journeys including use of both hackney carriage and private hire both from within the Borough fleet, and from other fleets across the County, as required by the services required to bring people to County facilities, principally schools.

South Ribble undertook an unmet demand survey in around 2000. This found no passenger queues in off peak hours which meant the overall index of significance of unmet demand (ISUD) was zero. For the record, average passenger delay was 0.07 minutes (4 seconds), and the proportion of people travelling in hours when there was an average passenger delay over a minutes was 0.25%. The delay profile was not peaked. Following this report, a decision was made that any new hackney carriage vehicles added needed to be wheel chair accessible. Saloon vehicles were given grandfather rights to remain as saloon. It is understood since that decision that just a single hackney carriage plate has been issued. Further discussion of fleet development follows below.

There was a recent application for a hackney carriage vehicle, but it was for a higher quality saloon vehicle and not a WAV style vehicle. It was therefore rejected as there was no further information how the vehicle would be used and on the basis the WAV policy was shortly to be reviewed.

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

There are some concerns about the early statistics for South Ribble, with no way of confirming what the correct values actually were. Some revisions have been made to avoid false impressions but there may be other inaccuracies remaining but they are used to paint a general picture.



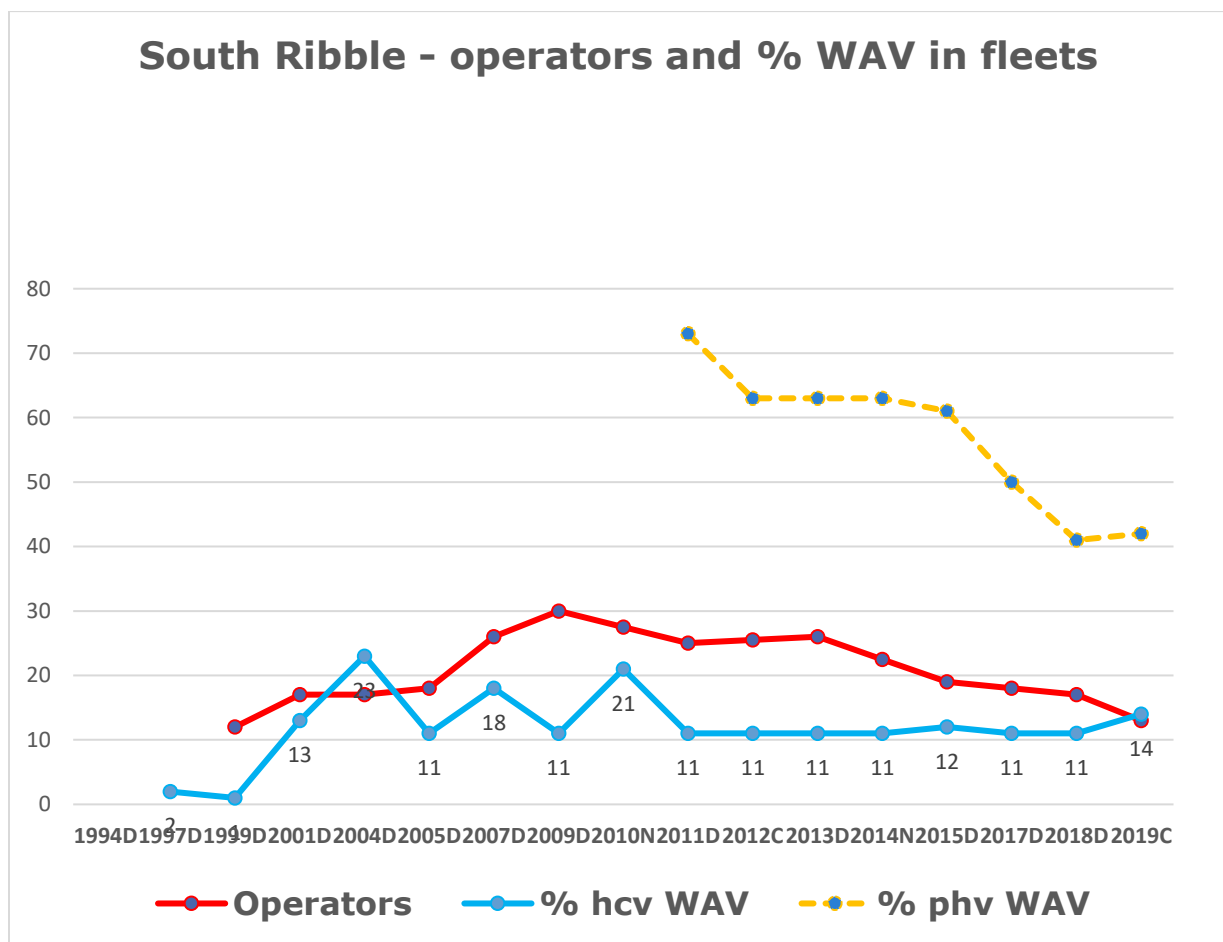
Licensing Statistics from 1994 to date

The general view is of a steadily reducing fleet of both hackney carriage and private hire vehicles. The same is true for both hackney carriage and private hire drivers. The current fleet is 231 vehicles in total, serviced by some 280 drivers, fairly equally split according to the vehicle type driven.

Given there are no dual drivers, some of the duplication is those who have both a hackney carriage and private hire licence, although drivers are not a focus of this current review.

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

However, all but one of these WAV in the phv fleet belong to one company that focusses on contracts and are not generally available to the public of the area.



Operator numbers and levels of WAV provision in the fleet

There are three cases where the level of hcv WAV appear to increase beyond the general level. However, these are believed to be errors in the statistics provided and the general picture is of a generally similar level of WAV in the hcv fleet, although the most recent statistics suggest a possible recent increase both for hcv and phv based WAV plates, although neither increases are significant.

A review was undertaken of the national proportions of WAV within hcv and phv fleets, using the latest DfT March 2018 statistics that are available. Using these statistics, the proportion of hackney carriage WAV in the English fleet apart from London, is 42%.

However, of the 292 licensing authorities in England (excluding London), 60 have 100% WAV hackney carriage fleets. There are a further six authorities who have no WAV vehicles in any part of their licensed vehicle fleet. 11 authorities have no hcv WAV but some in their private hire fleet. This leaves some 215 authorities that have some hcv WAV but are not fully WAV in their hackney carriage fleet. This is the level which is most appropriate to compare South Ribble to. For this group of authorities, the average % WAV on the hackney carriage side is 22% of the fleet. This is higher than the current 14% attained by South Ribble within its hackney carriage fleet.

However, there are 108 of these authorities having less than this proportion of hcv WAV, and two authorities, including nearby Lancaster, who have exactly the same proportion. 104 authorities have more hcv WAV proportion than South Ribble. This suggests South Ribble is in a reasonable position with respect to the level of WAV hackney carriages it has – effectively having the middle position within this set of authorities, although being below the average level.

An overall review of the licensed vehicle function received its final report in 2016, since which the latest version of the “Hackney Carriage and Private Hire Licensing Policy” stating local application of the present legislation and guidance was published in March 2018. Several items within this are relevant to this report.

Section 6.9 states the Council will issue hackney carriage licences to vehicles which are no older than 4 years when first presented for licensing, and in respect of purpose built taxis (i.e. Peugeot E7, Euro taxi) or other wheelchair accessible vehicles are no older than 6 years when first presented for licensing. General vehicles will no longer be eligible for renewal once they are eight years old, and for the purpose built category the limit is 12 years. However, to ensure the Council does not fetter its discretion proprietors can apply with older vehicles and these would be considered under the listed considerations in the policy by the committee.

Only vehicle age compliant and wheelchair accessible new vehicles can be added to the hackney carriage fleet. Vehicle licences issued on or before 21st October 2014 can be replaced with either a wheelchair accessible or non wheelchair accessible vehicle. All other proprietors may only replace their vehicle with a wheelchair accessible vehicle. This decision will be reviewed during 2019 (part of the reason for this Report).

For private hire vehicles, the age limit policy is slightly differently worded. The second category states 'larger MPV's, minibuses and other wheelchair accessible vehicles'. During the course of this review it has become clear that several of these vehicles are not actually wheelchair accessible even though some have body types that could either be adapted or otherwise made capable of taking wheelchairs. This is true of vehicles on both the private hire and hackney carriage side of the trade – the final confirmation of the wheelchair status of a vehicle is provided on the Council's list of designated wheelchair accessible vehicles. Licensing of non-WAV active vehicles is against the spirit of the age policy that seeks to provide redress to those willing to invest more in high cost, but WAV active vehicles.

At the present time, a general review of licensed vehicle policy is to be completed by the end of March, with a review of licensed vehicle policy specifically due by November 2019.

Present distinction between hackney carriages and private hire is as follows:

Hackney carriage – blue plates front and rear with roof sign

Private hire – yellow plate on rear only, door sticker advising the vehicle can only be pre-booked.

There is a further issue under discussion, regarding tinted windows and the potential application of a CCTV policy to the fleet.

A copy of the door sticker was provided. This is very small compared to many others we have observed around English licensing authorities. We understand the aim of the size is to prevent people thinking the vehicle is a hackney carriage whilst warning those entering the vehicle if they have not made a booking. Our view is that this makes the private hire vehicles of the area too inconspicuous and too difficult to identify from a private car.

During the course of our visits to the area, we noted that the location of the small private hire sticker is not consistent across vehicles. In some cases, the size allows the sticker to be located relatively inconspicuously – and often almost invisibly- which does not help the public to be certain that their vehicle is licensed. Appendix 3 provides photographs of a range of private hire vehicles to identify some of the range of applications undertaken.

During our latest tour it became clear that a further complication occurs where an operator runs both licensed vehicles and public service vehicles. The principal difference between the vehicles is in fact their seating capacity which is not externally obvious, and again the size of the private hire sticker does not help differentiate such vehicles more clearly. However, this is less of an issue as generally none of these vehicles tend to be publicly available or promoted to the public. It is, however, an issue for those wishing to ensure that privately contracted vehicles are locally licensed if they need to do so.

Vehicle fleet structure

A copy of the current fleet list was provided for the purposes of understanding the overall structure of the industry, and the current pollution impact of the present vehicle set. Further discussion regarding pollution impacts is provided in Chapter 5 below.

At the end of January 2019, the South Ribble licensed vehicle fleet comprised 105 hackney carriages and 126 private hire vehicles.

For the hackney carriage fleet, 14% remain independents. The rest were owned by four companies. One of these companies was in fact a one-vehicle, hackney carriage only operation. The largest company own 80% of the total hackney carriage fleet and 93% of the non-independent hackney carriage fleet. They also have 19% of the private hire fleet and are therefore a mixed-fleet operator. Co-incidentally their base is adjacent to the large contract-only operator so both fleets are often parked nearby each other.

All private hire vehicles are effectively company owned. There are eight small, two large and two mixed hackney carriage / private hire operators. However, of the small private hire only operators three of these are single vehicle, another has just two, two others have just three private hire, two have four and the largest has eight vehicles. The two smaller mixed vehicle fleets have two hcv and eight phv and three hcv and two phv respectively.

The largest private hire operator has 52% of the private hire fleet. However, we understand this operator does not undertake work apart from contracts. Many of these require WAV style vehicles, which accounts for all but one of the phv WAV fleet. This implies that the public-facing private hire fleet for the area is in reality just 61 vehicles.

The authority does allow vehicles that will not be public facing, i.e. executive vehicles, to apply for an exemption from exhibiting the private hire plate and sticker on the vehicle externally. This option, however, only applies to vehicles that could never really be utilised by the public, even for specific, i.e. airport contracts.

It is understood that there are currently no more than six of these vehicles, owned by three different operators. This reduces the public-facing fleet to some 58 private hire vehicles, of which 41% are owned and operated by the public facing large operator.

Further, at least one of the small operators mainly operates airport services only and three others have 'airport' in their name.

During our tours of the area, it proved very difficult to identify many of the private hire vehicles with most Leyland active vehicles tending to be hackney carriage with the main location for active private hire being the three smaller centres. Even there, the level of daytime activity of the fleet is not high.

The top three small shopping centres of Bamber Bridge, Lostock Hall and Penwortham all have their own operators with clearly presented booking offices (albeit mainly above shops rather than at ground level). These are in fact the three largest of the small operators, with just one having a mixed fleet, which also happens to be the largest of these three. It is understood that two of these operations have now effectively merged.

This suggest little operational demand for hackney carriages in either Bamber Bridge or Lostock Hall assuming all operations are undertaken legally (with no evidence this is not the case). However, at least one of these operators uses out of town vehicles, one of which was identified as an out-of-town WAV hackney carriage. We understand this operator also has out-of-town private hire as well.

The private hire situation has been complicated by mergers and acquisitions between the smaller companies. This is evidenced by both booking offices and in some cases vehicles advertising several different companies, often to attempt to keep some level of customer loyalty from the past. Whether this will be further complicated by the recent changes is yet to be seen.

We were made aware that enforcement activities have identified potential passengers, particularly in these three smaller locations, seeking to flag down private hire vehicles. There are also informal reports (including during our rank tour) that out of town London style hackney carriages from a number of licensing authorities, some legitimately acting as private hire in this area, may also find passengers seeking to flag them down. This might be seen as evidence of latent demand for hackney carriages particularly in the smaller areas where there are no ranks.

Even in Leyland, there is one fairly obvious booking office and at least two, if not more, free-phones, and relatively little footfall apart from the largest supermarket, so it is clear that phoned-for vehicles are the most likely way people will get licensed vehicles from an observation point of view (see synthesis section), even if many of these will arrive as hackney carriage vehicles.

The issue of the private hire sticker is complicated and has become confusing. Whilst all vehicles tend to display the sticker, most in a rear side location just beneath the back of the rear quarterlight, this is not consistent and its location can tend to it being lost on the overall vehicle. This is complicated by a wide variation in how private hire vehicles advertise their services and allegiance. There are at least two public facing company-owned vehicles that we have observed with no markings apart from the sticker and plate. The pictures in Appendix 3 show the range of markings on private hire vehicles in the area for which there is no current condition or guidance.

The WAV fleet

The present wheel chair accessible (WAV) hackney carriage fleet comprises 14% of the hackney carriage fleet. Of these, 73% are with one large operator, 20% with another large operator (who does not have a publicly facing booking office in the area), and the final 7%, or one vehicle, in the hands of an independent owner/driver. During both our area surveys, just under a third of the WAV hcv were observed, including the independent vehicle. No private hire WAV were seen at any point during either of our surveys. One vehicle was observed which looked like a WAV in size but which is one of those that is not WAV-capable.

It must also be reiterated that in both hackney carriage and private hire fleet there are vehicles operating which are the same type as those which have been converted to be wheelchair accessible, but which are not on the approved list and are not capable of taking wheelchairs. This is a national issue that arises from the industry needing a wider range of vehicles, and in some cases lower cost vehicles, than the pure purpose-built London style wheelchair accessible vehicles, most of which are converted from body types also available in non-wheelchair format (e.g. Ford Transit, Peugeot Partner, Citroen Berlingo, Vauxhall Vivaro and several others). Some of the lower cost vehicles are often motability conversions drawn in to the fleet at the end of their initial life. This can lead to the public considering there is a bigger WAV fleet than is actually available, and could lead to accusations of discrimination which might in reality be a driver not stopping because they knew they would only frustrate a person with their lack of ability to help them.

3 Review of rank provision and licensed vehicle operations

As already recorded in Chapter 2, control of provision of on-street ranks in South Ribble is ultimately in the hands of the Lancashire County authority. Appendix 2 provides a list of ranks in South Ribble at the time of this current survey. For this review of licensed vehicle policy, we undertook a drive-round survey of the area, including places where there was likely to be highest demand for the services of licensed vehicles.

During the course of our two site visits we identified each of the ranks that exist within Leyland, but found no evidence of ranks in any other part of the Borough. During the course of both site visits, vehicles were observed at four of the six rank locations identified. One location, Chapel Brow, operates only for very limited hours and is believed to be little used. Two locations, Golden Hill (Leyland Station) and Tesco Extra are on or near to private land and clearly used by both vehicles and passengers. They do not appear on the formal Lancashire rank list and are therefore assumed to be privately owned.

Further investigation found that both the Leyland station and Tesco ranks are on South Ribble council owned land, but do not presently have any associated traffic regulation orders. This may be as they are on private and not highway land. This point is being further clarified with Lancashire.

The Hough Lane and Thurston Road ranks were also seen with vehicles active but no passengers were observed boarding these vehicles during our visits. The final rank is now very poorly marked on the road, on Towngate. Our observations suggested most vehicles servicing the Asda site would be in response to the in-house free-phone to a local company, who would tend to enter the store car park to pick up rather than do so at the nearby rank.

The Tesco store also has a free-phone which is sometimes serviced from the rank and sometimes from other vehicles from the linked company driving in. As with the Asda free-phone it is most likely the attending vehicle will be a hackney carriage, but a private hire might also be sent dependent on availability of vehicles.

A company office was also observed in Leyland on the opposite side of the road and slightly distant from both the Hough Lane and Thurston Road ranks, locations where company vehicles – albeit usually hackney carriage – were often waiting for custom. The main base for this company is in an industrial estate where there are very unlikely to be many, if any, walk-ins.

Another operating practice identified was that in Leyland many hackney carriages wait for radio calls in specific locations, including within the Tesco car park, rather than waiting at the central ranks. It is not clear why this occurs, but there is no return to rank stipulation so they may be waiting in locations best identified to maximise reaction to telephone calls.

During the inception drive-round just three other locations were identified where there might be significant numbers of people wanting the service of licensed vehicles to the extent that ranks might be viable. Bamber Bridge, Lostock Hall and Penwortham all have booking offices clearly advertising their services in each location, with areas for vehicles to wait generally in front of the premises, or in either public or private car parks to the rear. However, our experience was that daytime demand was generally very low, in one case seeing only a very few vehicles active out of the fleet on a Thursday lunchtime.

Only the Penwortham operator has a mixed fleet of hackney carriage and private hire, meaning passengers must walk into the office rather than get directly into a vehicle in both other areas.

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

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 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.

This survey undertook a total of 300 interviews across the area. To maximise returns, the focus was on locations that should yield the best return rates for interviewers. The following interviews were undertaken:

- 100 in and around Hough Lane, Leyland
- 50 at Leyland Market
- 50 in Bamber Bridge
- 77 in Penwortham
- 23 in Lostock Hall

The surveys were undertaken on a Thursday / Friday and Saturday in mid-January and early February 2019. Weather was suitable for interviews and the full target number was achieved, albeit with a smaller sample possible in Lostock Hall, made up in the larger numbers at Penwortham.

The sample was reviewed against the latest available census information for the area. Compared to the gender and age profiles available from the 2019 values based on the 2016 estimates, our survey spoke with less males than the expected census value (35% compared to 48%), and less of both the younger and older age groups used (15% achieved compared to 19% for the 15-30's) and 37% rather than 42% for those 55 and over. More of the middle group were interviewed. We do not consider this should have over-biased the sample although these statistics should be borne in mind in considering the responses.

94% of those responding said they lived in the South Ribble area. 70% said they had regular access to a car.

From the full sample, 87% said they had used a licensed vehicle in the South Ribble area in the last three months, a very high level of recent usage. When actual frequencies of usage were taken into account, those responding were estimated to make around 7.8 trips per person per month by licensed vehicle, again very high. When this is compared to those saying they have specifically used a hackney carriage, the level drops to 1.2 trips per person per month, lower but still a high value. This suggests about 15% of users of licensed vehicles in the area use hackney carriages.

When directly asked how people obtained licensed vehicles, 79% said they only used one method exclusively. Of these, 71% only phoned for them, 5.5% used free-phones, 3% used an app, 2.5% hailed and 18% said they got them from ranks.

This suggests the hackney carriage usage level is about 20.5% of the total, in the same order of magnitude as the usage-based estimate of 15%. This does not include any hackney carriages obtained in response to phone calls.

10% of people said they used a mix of methods to get their licensed vehicles. Of these, 45% said they obtained them half the time from a rank and half the time by telephone. 14% said 25% rank and 75% telephone. 31% said half the time by phone and half the time by free-phone. 7% said half the time by telephone and half the time by app with the final 3% saying 10% rank and 90% phone.

Within the hackney carriage question, 56% said they could not remember the last time they had used a hackney carriage and 12% said they could not remember seeing a hackney carriage in the area. Given the make-up of the area, this is a relatively low response suggesting people are aware of hackney carriages in South Ribble.

However, there is a rider to the responses shown by the question asking what ranks people were aware of in the South Ribble area. From the relatively large number of responses, just 7% said Tesco Extra, Leyland. The only other response from within the area was William Street, which is in Lostock Hall, and which was a location we saw a relatively unmarked private hire vehicle parked at the rear of its office. This supports our observations that we never observed any hackney carriage being hired at any rank other than Tesco Extra despite vehicles being there. The only exception was one vehicle observed to quickly arrive and depart from the central rank in Leyland, which we can only suspect was a response to a telephone booking.

All the other responses were about ranks in Preston, of which a wide range were quoted. Overall, 60% of those quoting locations said they actually used them. This suggests that many people get Preston hackney carriages to locations within South Ribble, not an unsurprising result, but one which does temper the views quoted a little.

When people were asked to rate various elements of the licensed vehicle experience, all but price had responses only average or above. For price, 1% said 'poor' with 31% average, 46% good and 22% very good. The best score was obtained for driver knowledge, followed by driver professionalism. In the former case, 37% said they felt this was very good on their last trip, for professionalism the level was 31%. All other categories saw between 20 and 24% saying 'very good' with the bulk saying good. This suggests overall a very good service provided by the local licensed vehicle service, with an emphasis on the quality of drivers over the quality of vehicles.

When asked about what might encourage people to use hackney carriages, or to use them more often, 44% of those responding said 'cheaper fares' – a typical response. 36% said more hackney carriages they could phone for. 14% said more hackney carriages available at a rank.

People were asked if they, or anyone they knew, needed an adapted licensed vehicle to be able to travel. 85% said they did not. The dominant response for those needing some form of adaptation was 10% for some other form of adaptation rather than WAV style, with the level requiring WAV at 5%, half that of another adaptation. Overall, this suggests a fairly low demand for WAV style hackney carriages in the area.

The very small number of people (two) that said they had given up waiting for a hackney carriage had in fact done so in Preston, not in South Ribble.

94% of respondents felt there were enough hackney carriages in South Ribble overnight. Everyone felt safe using taxis in the daytime with just 3% not feeling safe after 18:00. The main matter that would make people feel safe, or safer, was there being more female drivers.

13% of those responding felt that all licensed vehicles should be low emission. However, 25% were not sure about their concerns, and 62% said taxi emissions were not a real issue.

17% said they would use an electric powered hackney carriage but only if it did not cost more to use. 83% said they had no preference, with none willing to pay more to use them.

With regards to paying by credit or debit card, 42% would be happy to do this as long as there was no surcharge. 58% would still choose to pay in cash.

5 Emission impacts of fleet

Air quality has been a concern for a long time. The Environment Act 1995, Local Air Quality Management, set up a program of air quality annual status reports undertaken in many areas, including a series undertaken in South Ribble. South Ribble presently has five Air Quality Management Areas, three of which are very close to the smaller urban centres of Penwortham, Lostock Hall and Bamber Bridge. The fourth area is in Walton-le-dale and the fifth, more recently put in place, is in Leyland. There are also some monitoring points along Hough Lane, Leyland. All these, apart from Walton-le-dale, are locations where licensed vehicles overall are active.

Since AQMA establishment, air quality matters have moved forward significantly. A High Court case in 2016 led to the Government being required to see improvements made in the shortest possible time. This led to legislation in 2017 establishing the UK Air Quality Plan that included 29 authorities being directed to produce Clean Air Plans. The Clean Air Zones (CAZ) proposed seek to provide sufficient improvement in air quality and public health mainly by reducing breaches of the mean nitrogen dioxide levels (No2).

The upshot of the research for CAZ suggested the potential need for such zones to apply charges to all pre-Euro 4 petrol and pre-Euro6 diesel vehicles to achieve reduction targets. The general application is to groups of vehicles easily targeted, which includes public service vehicles and licensed vehicles. For this purpose, the Government is currently consulting on plans to establish a national database of licensed vehicles that will ensure each and every licensed vehicle across the country can be charged when entering any CAZ zone within the UK, wherever the vehicle originates from or is licensed in.

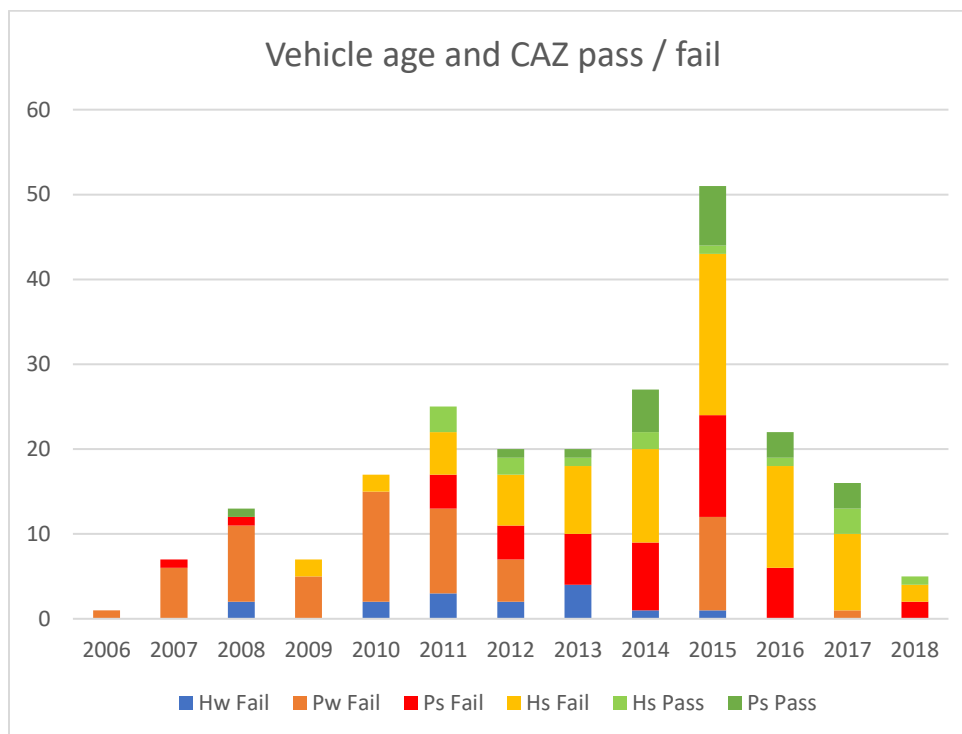
Prior to these issues becoming paramount, the Government had funded several studies to help specific authorities consider transfer of their licensed vehicle fleets to low or zero emission vehicles. Around six pilot studies were undertaken, although a key pointer from these made it clear that any future policy must also leave the trade able to meet public demand adequately given the restrictions (in terms of cost, availability of vehicle types, and availability of charging infrastructure) that zero emission vehicles implied on operability.

Key emerging issues include that the presently proposed zero emission vehicles are all based on the classic London purpose-built taxi style and size, with major concerns arising from battery range and charging infrastructure issues.

Details of the South Ribble licensed vehicle fleet were obtained from the Council comprising vehicle registration plate, licensed vehicle type, if Wheel chair accessible style or not, make and model. This was used to obtain from DVLA and Greencar the relevant pollution levels for each vehicle. These were summarised with the overall results presented below. 2015 research identified that a third of UK NoX emissions were from road transport, mostly from diesel vehicles.

There are three areas used to help considerations. Firstly is vehicle age, based on the premise that vehicle performance has continually been improving, and that older vehicles tend to depreciate in terms of environmental performance in general terms, although as with all vehicles there can be exceptions. Secondly is CO₂, and most recently the focus has been on NoX, with the principal target diesel vehicles.

The graph below shows the age of vehicles and if they would pass or fail the Clean Air Zone charge test, i.e., are they Euro 4 petrol, Euro 6 diesel or low / zero emission vehicles. The fleet is split between hackney carriage and private hire, and wheelchair capable and other vehicles. Hw represents wheelchair accessible hackney carriages, Hs any other hackney carriages (including some wheelchair style that are not wheelchair capable), Pw wheelchair accessible private hire and Ps all other Private hire vehicles.



Only the two green shades are vehicles that pass the CAZ charging test. This shows how most vehicles older than 2011 fail the CAZ test. More strikingly it demonstrates that all current WAV style vehicles, both hackney and private hire all fail the test. It also shows that even some very recent vehicles fail given they do not have Euro 6 engines.

Just 15% of the total fleet remain within the pass category. Some 13% of the saloon hackneys pass as do 17% of the saloon private hire vehicles. This suggests urgent need for action on air quality matters.

Further analysis shows that:

- There are three hackney WAV and one phv WAV in the top 14 most polluting vehicles in NoX terms
- There are 21 vehicles which have WAV body styles but are not either on the WAV s165/7 list or are not actually WAV-capable
- There are just three electric hybrid vehicles in the entire fleet, all 2015 registered and all in the saloon private hire fleet
- One of the petrol vehicles that passes on the Euro engine standard in fact has a high NoX emission value

Overall, this demonstrates that the present licensed vehicle fleet is not particularly environmentally friendly with a more significant issue related to wheelchair accessible vehicles. Whilst this might not be an issue at present, with the upcoming Government list of licensed vehicles drawn together for the purpose of Clean Air Zone charging, this will become an issue for vehicles that service passenger heading to such areas (currently the nearest will be Greater Manchester, whose detailed CAZ zones and charging are still being developed).

However, given the pressure on Government to act with respect to air quality, there is no guarantee that more local restrictions might not come forward in the near future. It is certainly clear that the Council needs to encourage movement towards a more environmentally friendly fleet as soon as practicable.

6 Summary, synthesis and study conclusions

This Review of licensed vehicle policy on behalf of South Ribble has been undertaken using our proposed methodology put forward in advance of undertaking the work, as agreed and refined at our inception meeting.

Background and context

South Ribble has a very varied population and levels of prosperity. The principal urban area is Leyland, with the busiest railhead located at the northern edge of the town, and four formal and two private ranks, at least four of which see daily usage. There are three other locations with agglomerations of population and shops, two of which have rail stations, albeit with only hourly rail services between Preston and Blackburn. All three have local private hire companies with active offices, but no formal ranks.

A major source of income for at least one local private hire company takes their vehicles across Lancashire, servicing significant numbers of vulnerable persons on school and social service contracts. The three other smaller agglomerations are also very much 'in the shadow' of the nearby City of Preston whilst still having their own characters.

A review of demand for hackney carriages in 2000 found no significant unmet demand for hackney carriages based primarily on there being no off-peak passenger waits at ranks. Total passenger delay on average was just four seconds, with just a quarter of one percent of passengers experiencing travel in an hour when the average passenger delay was a minute or more. There is no further detail on where such delays occurred. However, our review of the area in 2019 suggests a very high proportion of the hackney carriage fleet are owned by companies. Just 14% remain independent.

The present licensed vehicle fleet has 14% of its hackney carriages wheelchair accessible capable – about the median of all English local authorities with some wheelchair accessible vehicles but which are not fully wheelchair accessible fleets. The actual level is less than the mathematical average of 22%, although this is dominated by several authorities with very high wheelchair accessible levels.

All but one of the wheelchair accessible capable vehicles in the private hire fleet operate for the company focussing on Lancashire contracts and are not generally available to the public of the South Ribble licensing area.

In terms of the public operation of the local licensed vehicle fleet, Leyland is dominated by one mixed fleet company, which has 80% of the hackney carriage fleet and 19% of the private hire fleet on its books. The other three smaller areas have companies based in them but only one of them has hackney carriages as part of its fleet (see below).

Only one of these, Penwortham, has a mixed vehicle fleet such that nearly all usage of licensed vehicles outside Leyland will be booked trips. However, enforcement activity and other informal comment suggests there could be some passengers seeking to hail both private hire and out of town hackney carriage style vehicles particularly in the smaller areas.

Despite the free availability of hackney carriage plates to those wishing to add a wheelchair accessible capable vehicle, we understand there have not been more than one or two new vehicles added since 2000.

Rank observations

As already noted, ranks only formally exist in Leyland. Of these, the main active location is the private Tesco Extra rank. Thurston Road is also active, but mainly with waiting vehicles whilst Hough Lane is occasionally used by passengers and vehicles. The private station rank sees intermittent use by both vehicles and passengers. In our experience of visiting the area, we were always able to obtain a hackney carriage from the station when we wanted one, without any recourse to booking.

In Leyland and the three other centres private hire booking offices are obvious and often see vehicles around them. The option of use of delegated powers to appoint ranks by South Ribble has not presently been used, although is available from the County if needed. There are also a good number of free phones that reinforce the booked nature of licensed vehicle travel across the area, albeit often with hackney carriages in the case of Leyland.

On street public views

A generally representative sample of 300 members of the public were interviewed across South Ribble. 94% of those interviewed were from South Ribble. The level of recent usage of local licensed vehicles was very high at 87%. Actual quoted usage is also very high, with 7.8 trips per person per month total and 1.2 for specific hackney carriage journeys.

People mainly use one preferred method of getting licensed vehicles. 71% only phoned, 18% only used ranks and 2.5% only hailed. The largest proportion using more than one method split their use between ranks and direct phone calls. 56% of those responding to the question could not remember when they last used a hackney carriages, with 12% not remembering seeing one in South Ribble, in context a fairly low response suggesting fair awareness of hackney carriages across the area.

The main concern arising was that people tended to quote ranks as being those in Preston, with only the Tesco Extra rank named by respondents. Of further concern was someone quoting a rank in Lostock Hall where we had seen a fairly poorly marked private hire vehicle at the rear of a booking office, potentially confirming the issue of hailing of private hire vehicles in the smaller centres. This would suggest strong need for education of the public of South Ribble as to how they can get licensed vehicles.

People rated driver knowledge and professionalism highly, but all other elements were also well rated suggesting the overall licensed vehicle service in the area is well provided and of high quality in the minds of users.

85% of all responding said they were not aware of any need for wheelchair accessible vehicles. The main need known about was for non-wheelchair style adaptations.

The only latent demand identified related to Preston and not South Ribble. 94% felt there were enough hackney carriages and all felt safe in the daytime, with just 3% not feeling safe at night, with the main suggestion for increased safety being more female drivers.

13% of those responding felt all licensed vehicles should be low emission, but 62% felt this was not a real issue and the remaining proportion were not sure.

17% would choose an electric powered hackney carriage, but only if it did not cost any more in fares. On the contrary, 42% would appreciate the opportunity to pay fares by card.

Emission impacts

Using the proposed Clean Air Zone charging regime (vehicles exempted from charge only if they have Euro 6 diesel or Euro 4 petrol engines), just 15% of the present fleet pass, split between 13% of hackney carriage non-wheelchair and 17% of private hire non-wheelchair. No wheelchair accessible capable vehicle passes, either on hackney carriage or private hire sides. Four of these vehicles are in the top 14 vehicles in terms of emission levels.

The fleet only has three hybrid and no electric vehicles at all. Overall the present licensed vehicle fleet is not particularly environmentally friendly.

Synthesis

South Ribble has a moderate-sized licensed vehicle fleet with a reasonable level of wheelchair accessible capable hackney carriages. However, companies dominate their respective areas although 14% of hackney carriages remain independent and 14% of hackney carriages (a different set) are wheelchair accessible capable. There is only one mixed fleet company in the three smaller areas with the other two seeing private hire operations. Even in Leyland the only active passenger and vehicle rank is the private Tesco location, and even this has competition from a freephone – although it appeared in all our visits that the bulk of response to this was by hackney carriages.

The level of usage of licensed vehicles is very high, even for hackney carriages, and people do say they use ranks, although some may be quoting use of hackney carriages from Preston to the area.

Many phoned-for bookings will be serviced by hackney carriage vehicles particularly in Leyland. Despite freely available hackney carriage plates for wheelchair accessible capable vehicles, few have been added and the overall evidence is little need for such vehicles. There is a very high provision of wheelchair accessible capable disabled vehicles in the private hire fleet, but all but one is for work on Lancashire county, non public-facing contracts, which take that fleet across the whole of the County.

The full licensed vehicle fleet is well-appreciated by the public, and well-used by them. People can generally get vehicles when and where they need them by their preferred method. They generally feel safe using the fleet.

Despite all these favourable aspects, there are some concerns that need to be addressed:

- The current total fleet is not particularly air quality friendly
- There are just three hybrid and no electric vehicles in the whole fleet
- None of the present wheelchair accessible capable fleet would pass future Clean Air Zone charging regimes
- Many of the wheelchair accessible capable vehicles are amongst the most polluting
- There is evidence that the public are unaware they should not attempt to flag down private hire vehicles, and they are also ignorant of the issues of out of town vehicles
- This potentially implies latent demand for hackney carriages in the smaller areas

- It also suggests that it is critical that local private hire vehicles are much more clearly identifiable, in particular as local licensed private hire which should only be taken by being phoned for
- The age policy for hackney carriage and private hire vehicles are not consistent and both elements of the trade have vehicles that might be wheelchair accessible but which are not capable of taking a wheelchair
- Some of these vehicles appear to breach the spirit of the age policy exemption although it is accepted they are not legally in breach of the actual words used

With respect to adding CCTV to vehicles, this is a current national focus and national experience and guidance should be followed and moved forward. The proposed choice explained to us regarding use of tints or CCTV seems sensible and appropriate.

Whilst there is no need for more wheelchair accessible capable vehicles in the hackney carriage fleet, there is need for a balance in revising policy to ensure that the current level can be maintained and encouraged.

7 Recommendations

On the basis of the evidence gathered in this review of licensed vehicle policy for South Ribble Council, the following revisions should be considered:

- Revise the current restriction on new hackney carriages to encourage hybrid or electric vehicles to be added to the fleet (retaining the option of wheelchair accessible capable additions but encouraging these to be as air quality friendly as possible)
- If this results in hackney carriages being added to service the smaller three areas, consideration might be needed of appointing ranks in each location
- Ensure that enforcement actions include hailing of both private hire and of vehicles from out of town, whether hackney carriage or private hire
- Consider harmonising the hackney carriage and private hire wording on age policy in the short term and
- In the medium to longer term, move towards removing the different age policy between wheelchair accessible and saloon vehicles from both sides of the trade
- Whilst ensuring sensitivity with the non-public facing wheelchair accessible capable fleet to avoid potential severe impacts on those who are vulnerable
- And finding ways to ensure the current hackney carriage wheelchair accessible capable fleet is not diminished
- Give consideration to how important vehicles in the fleet might be given sunset rights within any national database of licensed vehicles being set up for the national CAZ charging regime
- Ensure the public are clearly educated how to get licensed vehicles particularly that only hackney carriages can be hailed
- Educate the public that they are better protected using only local licensed vehicles
- Enhance signing on private hire to ensure people can identify local private hire easily, ensuring they are also aware they can only engage them by booking
- Provide guidance on what and where company details can be provided on private hire vehicles given that present practice has become very complicated and potentially a safety issue to customers who would find it very hard to be clear if a vehicle could be hired or not
- Engage with national movements towards adding CCTV making use of the wider experience from such bodies as the National Private Hire and Taxi Association to ensure the fastest and most legal-compliant possible introduction
- Ensure all WAV capable hackney carriages have a clear sign demonstrating their WAV capability

- This may require going a further stage to ensure that all drivers of these vehicles are adequately trained to use the vehicle equipment

Many of the above aims will need careful balance to ensure the current fleet moves forward to be future-proofed as early as possible without reducing the fleet size which is probably presently at an optimum level.