West Suffolk Council Licensed Vehicle Demand Survey

January 2025

Contents

Executive summary

ES1. This hackney carriage demand survey has been undertaken on behalf of West Suffolk Council following the guidance of the November 2023 Department for Transport (DfT) Best Practice Guidance document, and all relevant case history regarding 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 regarding 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.

ES2 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, and if demand could be met by less hackney carriages. Overall demand in 2024 was found to be 36% less than in 2019 but for a similar profile of demand. Key losses related to night demand. There appeared sufficient vehicles to meet rank demand although some respondents mentioned gaps in rank service. Were a specific fleet only to provide rank and hail work, the number required would be significantly smaller. However, it is also clear that many hackney carriage licences are held but not focussing on just rank or hail operations.

ES3. Overall levels of hires for the hackney carriage fleet that exists are very low, and almost half what they were in 2019. More are taking up school contracts. App work is increasing with a healthy focus on local apps.

ES4. The public provided a very good response although focussed more on users than an on-street set of interviews. A major concern is that none of the issues, and more concerningly none of the serious issues mentioned had been reported to anyone, not least the licensing section, council or police, which some should have been. It is clear a method and marketing is required to ensure the public are able to provide continued and honest feedback to the licensing team regularly.

ES5. Key stakeholder responses provide opportunity for the council to work with specific businesses, in particular with the rail operator who otherwise makes decisions affecting taxi provision to their customers that go against the best interests of the public and council.

ES6. Despite a difficult picture being painted of the current situation for the licensed vehicle trade in West Suffolk, there are encouragements. Many public respondents complimented the service.

ES7. The increase in hackney carriage vehicle numbers does not appear to be driven by overall demand levels, which have fallen. This reiterates that choice of a hackney carriage vehicle licence is not driven by desire to meet rank or hail needs, but often for other reasons, perhaps principally the greater freedom this gives an individual to operate without needing an additional operator licence.

ES8. It does appear to be the case that existing hackney carriages are accessible to all who need to use them, although operational matters can lead to issues for the public.

ES9. The removal of the two zones has not had either positive or negative impacts. The WAV policy has reduced numbers although the provision in light of national provision remains good.

ES10. The collaborative nature of this project, sharing different expertise between the council and the expert consultancy has added significant value to the project and database of knowledge. It has also given high levels of ownership of the results to the licensing team and others within the council.

ES11. Specific recommendations include:

- establishing an ongoing feedback process
- reintroducing and maintaining the Section 165 list
- establishing continued collaboration with the operator of Bury St Edmunds station
- review of the informal rank in Bury St Edmunds
- innovation to enable anyone arriving at a rank and finding no vehicle to be able to get access to the fleet of hackney carriages
- marketing of the positive elements identified with trade, public and key stakeholders and consideration of making the most of this feedback
- more detailed input from Haverhill public and stakeholders
- more engagement between the licensing section and local private hire companies
- regular refreshing of plate observations at ranks to keep knowledge of operating levels current

1 General introduction and background

1.1 West Suffolk Council is responsible for the licensing of hackney carriage and private hire vehicles operating within the district and is the licensing authority for this complete area.

1.2 The council was created on 1 April 2019 following the merger of the former Forest Heath District Council and the former St Edmundsbury Borough Council 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, and a significant review of the accessibility of the present total licensed vehicle fleet.

1.3 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. As part of preparation for the wider policy review of 2020 a commitment was made to undertake a survey of supply and demand for hackney carriages in the new authority area.

1.4 The West Suffolk Council Hackney Carriage Demand Survey January 2020 was carried out in 2019 and since then, a few policy items have been revised and the two zones that covered the former council areas for hackney carriages have been merged. The policy has also been amended to help overcome some issues arising from the pandemic although the need to transfer the fleet away from fossil fuel usage is also actively being reviewed. As further work followed the conclusions of that report, agreement was reached to repeat the survey in 2024 once changes to policy had been given time to settle in.

1.5 The latest hackney carriage and private hire licensing policy document was approved by Cabinet on 19 July 2022 (Agenda for Cabinet on Tuesday 19 July 2022, 6.00 pm).

Best practice guidance

1.6 This review of current demand is based on the best practice guidance (BPG) produced by the Department for Transport in November 2023 (GOV.UK - Taxi and private hire vehicle licensing: best practice).

1.7 This focus on collecting a database of information is to help understand the results obtained from removing the two hackney carriage zones and from other policy changes since the last survey. This is following the latest advice in the current BPG. It particularly allows identification of how the service is currently meeting public need. This survey has also seen more collaboration and joint working between the authority and the consultant to maximise the opportunity to obtain feedback regarding the service using specific council contacts not otherwise readily available to external consultants.

1.8 It should be noted at this point, for clarity, that at the time of the original 2019 survey the current best practice guidance (BPG) review period was three years (but with no legislated requirement, which is restricted to Section 16 of the 1985 Transport Act that only references refusal to issue new hackney carriage plates), the 2023 review period was modified to a maximum of five years and a relation to the local transport plan timelines (although these are not as exacting as the BPG assumes).

Overarching background

1.9 Current hackney carriage, private hire and operator licensing is undertaken within the legal frameworks first set by the Town Police Clauses 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.

1.10 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.

1.11 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 (although it is accepted that when talking to the public the term 'taxi' is used in its widest sense including both kinds of vehicle).

1.12 There is a continuing theme and confirmation that local licensing policy and its application is for local licensing authorities and their councillors to determine and apply, with the main aim to keep the public safe – which does therefore include members of the public who also happen to be involved in providing the reality and actuality of the licensed vehicle trade. However, it is also noted that there are some authorities who licence operators, drivers and vehicles and allow them to be used in other authority areas.

1.13 Local authorities retain the right to restrict the number of hackney carriage vehicle licenses. The new BPG encourages not only harmony between elements of review but also that these tie in with the revisions of the Local Transport Plans for the appropriate area (which may not always equate to the licensing area, often being for larger areas where two tiers of authority exist).

Current Government policy review status

1.14 The November 2023 BPG is now the full refresh and overhaul of the April 2010 document. In terms of unmet demand there is no real change. However, the document does recommend that the use of unmet demand methodology can help review both levels of need for wheelchair accessible vehicles as well as reviewing overall fleet accessibility. This survey for West Suffolk Council, already in process before the new BPG, is therefore more than compliant with the tones of the new document.

1.15 One change within the BPG document saw the recommended maximum interval between surveys increased from three to five years. However, this mainly applies where there is a limit on hackney carriage vehicle numbers and in any event is, as the rest of the BPG, Guidance, and not legislation. The new BPG also applies the five-year maximum to any reviews of ranks or accessibility of the hackney carriage and private hire fleet that may occur. The only relevant legislation is Section 16 of the 1985 Transport Act which does not define any timescale apart from a duty for authorities with hackney carriage vehicle limits to be certain there is no unmet demand that is significant. Again, there is no legal definition of what significant unmet demand specifically is.

1.16 A key focus is aligning licensed vehicle policy with overall transport policy particularly with reference to the Local Transport Plan. However, this is not a new focus given that the Department for Transport (DfT) undertook a review in 2002 and then encouraged inclusion of licensed vehicles in Local Transport Plans. It should be noted that in general most transport authorities are currently reviewing their LTP documents for issue during 2024 despite no new guidance being provided re content (which had been promised for during 2023). The next Suffolk County Council Local Transport Plan will shape travel to 2040 and is seeing feedback gathered during Autumn 2024.

Unmet demand and its significance

1.17 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.

1.18 Over time, it has become evident that the tool essentially measures performance of hackney carriages towards the public by taking a range of operational statistics and balancing them to provide measures of how the fleet is balancing demand and supply. Although some believe the index to be a blunt measure, recent surveys have shown it to be able to identify impacts of much wider changes, principally those arising from the pandemic, on public service in a valuable way to guide not just limit policy making.

1.19 Again, this report is using these elements as part of the database of information to help test and shape future policy.

Recent changes to legislation

1.20 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). Two Acts introduced in 2022 made small but significant changes (more detail below).

1.21 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 wheelchair 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 wheelchair

- not make any additional charge for doing so
- if the passenger chooses to sit in a passenger seat to carry the wheelchair
- take such steps as are necessary to ensure that the passenger is carried in safety and reasonable comfort
- give the passenger such mobility assistance as is reasonably required

1.22 This was enacted from April 2017 and whilst some elements of the Equality Act remain unadopted, one of the two 2022 Acts made further moves to adopt part of the EA. These two 2022 acts make small but significant changes. The 2022 Acts are the Taxis and Private Hire Vehicles (Safeguarding and Road Safety Act) (31 March 2022) and the Taxis and Private Hire Vehicles (Disabled Persons) (28 June 2022).

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

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

1.25 Regard has also been had to the Statutory Taxi and Private Standards July 2020 which were published on 21 July 2020 and represented a milestone in transportation regulation, because for the first time the safeguarding of children and vulnerable people were put right at the heart of the taxi licensing system.

Conclusions

1.26 In conclusion, the present legislation in England and Wales sees public fare-paying passenger carrying road vehicles (buses and taxis) 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, but also including access to bus lanes.

1.27 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.

1.28 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 through 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.

1.29 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.

1.30 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 North Yorkshire, 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.

1.31 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. This Report does consider in outline the apparent impact of the merging of the two zones for West Suffolk.

2 Local background and context

2.1 Key dates for this demand survey for West Suffolk Council are:

- In July 2022 the (then) Portfolio Holder provided a commitment for the council to commission and report on a further unmet demand survey by the end of 2025
- Appointed Licensed Vehicle Surveys and Assessment (LVSA) in January 2024 in accordance with our proposal of December 2023
- As confirmed during the inception meeting for the survey held in early March 2024
- This survey was carried out between June and August 2024
- Local consultation of the public occurred using local authority sources and marketing with opportunities to respond closing in early September 2024
- There was no on-street public interview element undertaken for this survey although a wide range of methods were used to publicise the opportunity to provide input
- The video rank observations occurred in early June 2024
- Licensed vehicle driver opinions and operating practices were canvassed using an all-driver survey available from mid-June 2024 to late-July 2024
- An operator-specific survey was also utilised
- Key stakeholders were consulted throughout the period of the survey, both by LVSA and through the council promoting the survey through social media
- A draft of this final report was reviewed by West Suffolk Council during November 2024 and reported to the appropriate council committee following acceptance of the final report.

2.2 This 2024 survey brief covers both demand for hackney carriages and their accessibility. In detail:

"to establish the following:

1. Number of hackney carriages licensed by West Suffolk Council

   a. Is there any significant demand that is unmet by the existing hackney carriage fleet?

   b. If there is no such significant unmet 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?

   c. 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

   a. Are the existing hackney carriages accessible to all persons who may wish to use them?

   b. Are wheelchair users able to use the services of the existing hackney carriage fleet?"

2.3 This report provides the evidence data base required for the future overall policy impact review but focussed on the 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.

Current statistical background

2.4 West Suffolk Council population as of 2023 was 186,063. Although population estimates for 2021 and the actual census values were not far off each other, levels are now quite different with the sub national population projections of March 2020 suggesting 182,464 for 2023, suggesting recent larger growth, with obvious implications for need for licensed vehicles.

2.5 The West Suffolk Local Plan Submission 2024 suggests 2011 to 2021 saw households growing 10.6% compared to 6.2% as the average for England. 21% of the population at that time was aged 65 and over, marginally higher than the 18.41% English average.

2.6 Information quoted in the West Suffolk Local Plan Submission 2024 (para 1.27) states the 2021 census showing the following population distribution:

- Bury St Edmunds 23.2%
- Haverhill 14.7%
- Newmarket 9.3%
- Brandon 5.4%
- Mildenhall 4.9%
- Villages and outlying areas 42.5%

2.7 This is a spread of population is not mirrored by rank provision. Whilst there is a key active rank in Bury St Edmunds, provision for Haverhill - though existing - sees much less usage, with the next largest active rank being in Newmarket. There is no rank provision at all in Brandon and just the central rank in the bus railway station in Mildenhall.

2.8 Suffolk County Council is the highway authority although a significant element of transport planning is covered within the West Suffolk Local Plan.

Local transport plan

2.9 The latest available local transport plan covering West Suffolk is the Suffolk Local Transport Plan (LTP) 2025-2040. This is the fourth LTP presented, and as is typical, that document is generally high level and does not reference licensed vehicles apart from discussion about demand responsive services needed to replace conventional rural bus services that were fast ceasing to be the best way to provide rural public transport. This was published in October 2024.

2.10 The plan details a range of interventions aiming to deliver 'net zero' including the rollout of zero-emission vehicles. The aim is net zero by 2030. It is set within the context of Transport East, the sub-national transport body including Norfolk, Essex, Southend-on-Sea and Thurrock. It has the Transport East Transport Strategy 2023-2050.

2.11 The headline key theme remains 'Decarbonisation of Transport', together with 'A strong, sustainable and fair economy', 'health, wellbeing and social inclusion' and 'creating better places'. Of the 15 strategic areas identified, five are in West Suffolk (Bury St Edmunds, Haverhill, Newmarket, Mildenhall and Brandon).

2.12 The top three scheme areas are expected to be:

- substantial and transformative cycling, walking and wheeling improvements,
- bus service improvements
- traffic capacity improvements to unlock plan led growth.

2.13 Rural interventions will include providing transport options to minimise social isolation for communities, deliver public transport improvements whilst ensuring the natural environment for rural communities is maintained for the benefit of all. No further information is available at this point.

2.14 A focus is to create transport hubs improving integration of cycling, walking, buses, trains and taxis. No further reference is provided regarding taxi services.

Limitation policies

2.15 For the sake of clarity, neither separate zone had a limit on the number of hackney carriages at the time when West Suffolk became a single council although both had seen unmet demand studies, one of which led to removal of the limit in favour of new vehicles being wheelchair accessible, but in the first decade of this century.

Fleet statistics

2.16 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. Results for West Suffolk are presented in the two graphs below.

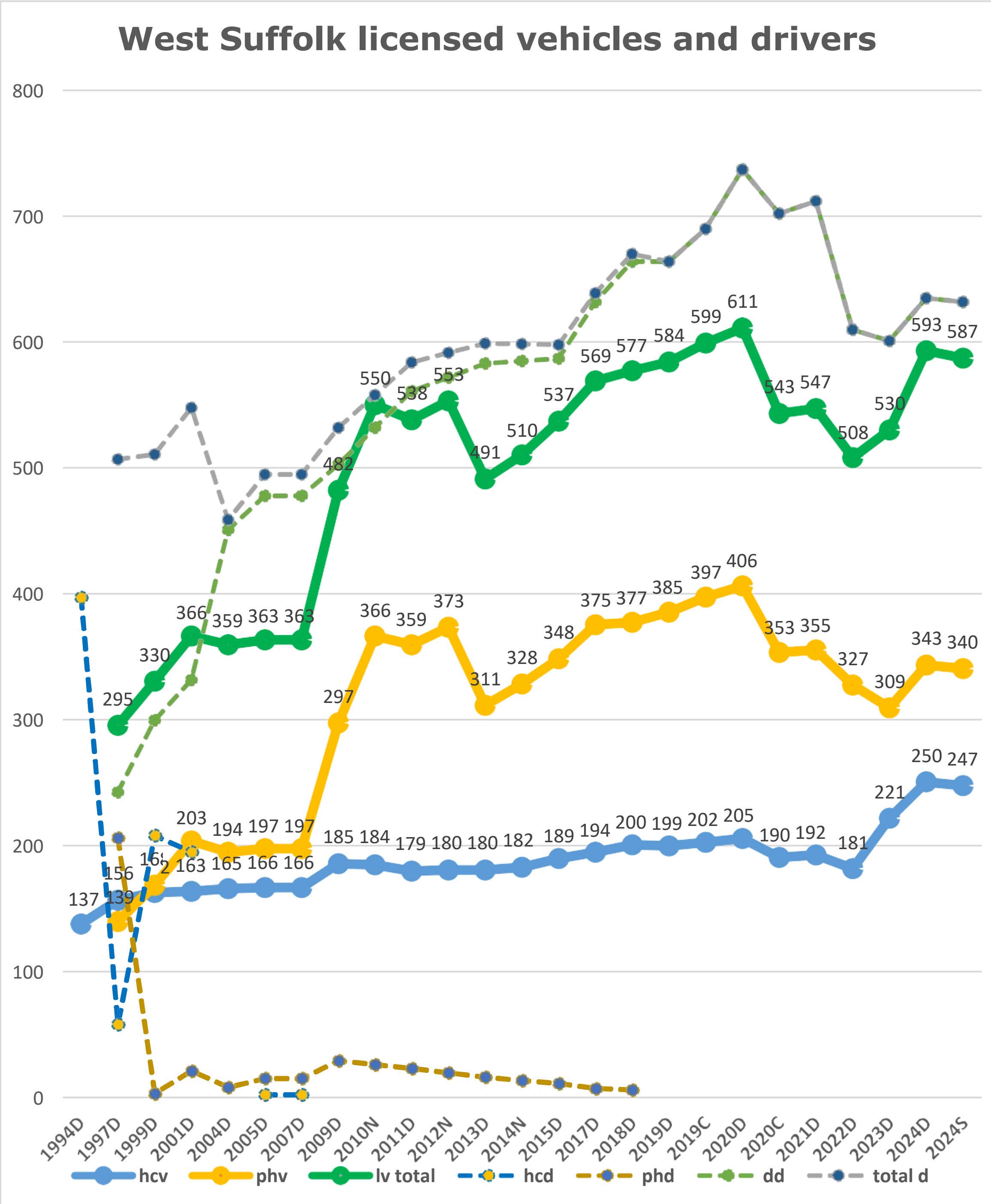
2.17 The Department for Transport (D) surveys occurred in outline in 1994 (hackney carriage only), 1997, 1999, 2001, 2004, 2005 and then every two years to 2017, then annually since; whilst the National Private Hire (N) records supplemented the 'even' years 2010, 2012 and 2014 to provide an annual record almost until the DfT chose to make their review annual in 2017. 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 31 December in the year quoted. Council licensing authority records (C) values are usually provided at the date of the rank work (in this case for June 2024) to ensure the active fleet at the time of survey is clear.

2.18 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 (that is. both hackney carriage and private hire)
- D= Dual (that is applies to both hackney carriage and private hire)

- V= vehicles
- D= drivers
- Ops= operators

Licensing Statistics from 1994 to date, West Suffolk total



(see above graph for explanation of abbreviations)

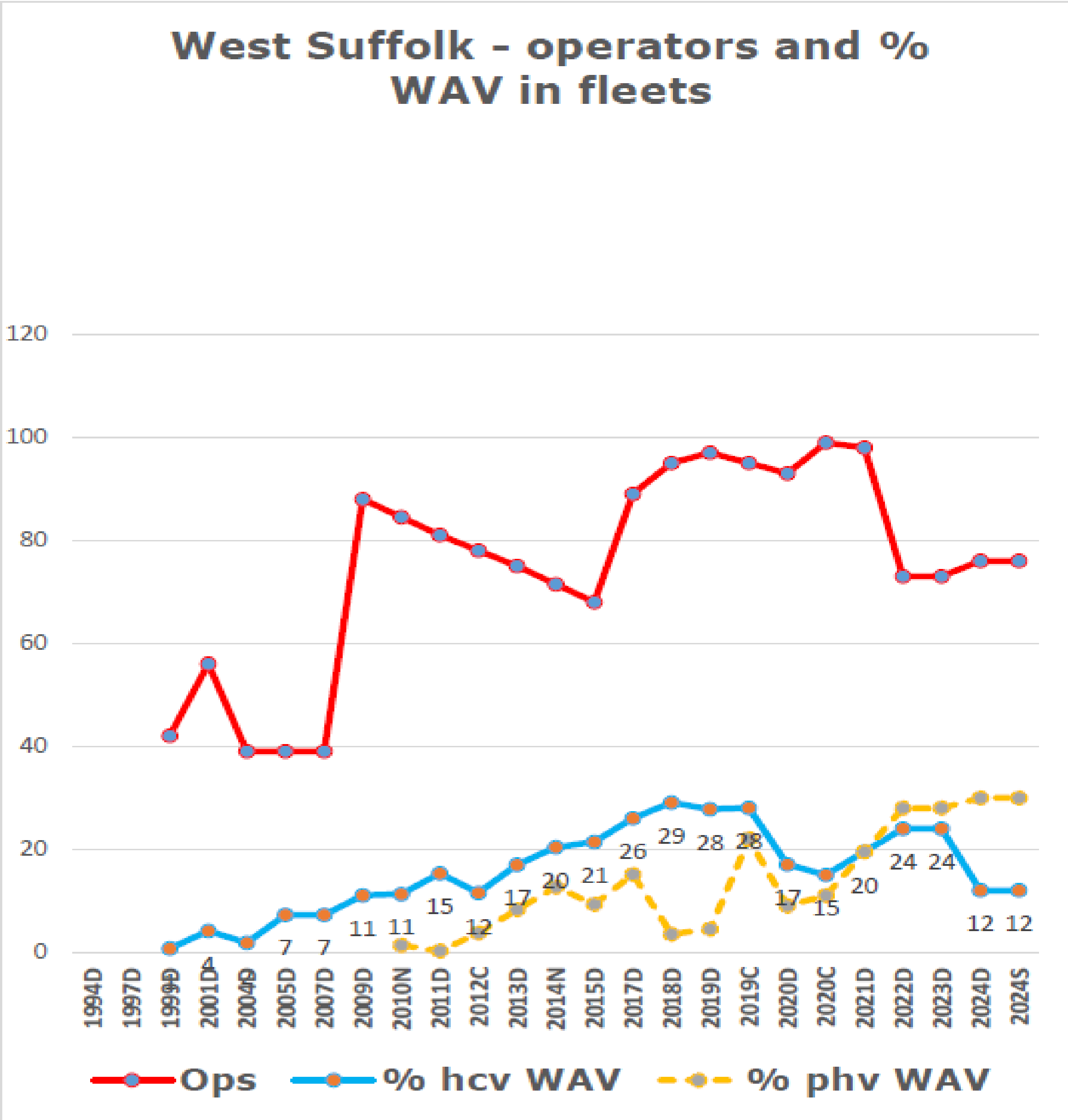
2.19 For West Suffolk, both hackney carriage and private hire vehicles have shown steady levels of numeric growth over most of the time for which statistics are available. However, the impact of the pandemic was much more severe for private hire vehicle numbers than for hackney carriage. Further, hackney carriage numbers have bounced back more quickly and more resolutely than private hire to the effect that the 2019 dominance of private hire is now much reduced. Total vehicle numbers at the time of the survey were marginally lower than the peak total of 2019. Growth of private hire did not restart until 2023 whereas that for hackney carriage began again in 2022.

2.20 However, in terms of the proportion of vehicles, at the present time the West Suffolk hackney carriage fleet makes up 42% of the total licensed vehicle fleet, which numbers a total of 587 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 over half of what it is now. At the peak level of 611 total vehicles, the hackney carriage share was 33%, showing the quicker bounce-back and growth of hackney carriage in the area has benefitted its numbers and therefore competitive position in regard to private hire.

2.21 In terms of driver growth, only available for all drivers, numbers remain below the 2019 peak of 737, just over 100 less at 632 at the time of survey. This still nets out at 1.08 drivers per licensed vehicle, although at peak numbers this value was 1.21.

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

Operator numbers and levels of WAV provision in the fleet



(see 2.18 for explanation of abbreviations)

2.23 The overall picture is of operator numbers increasing sharply around 2009, but then steadily reducing to 2015 after which there was growth to 2021, then stronger decline, with the current level at around 76 (was 99 at peak).

2.24 Wheelchair accessible vehicle (WAV) proportions had been rising in both fleets until 2023 but have seen decline to just 12% of the hackney carriage fleet but still 30% of the private hire fleet by the time of the survey. There were some statistical issues with data around the time of the last survey, although the actual decline to date is correct.

Comparison to national levels of WAV

2.25 The latest Department for Transport survey of overall licensed vehicles statistics covered information for the end of March 2024. At that time 23% of the total fleet was WAV style. This placed the authority 38th out of the 267 licensing authorities in England. However, by vehicle type, the authority was

104th out of 199 for hackney carriages (12% of hackney carriages WAV) and 10th in order of private hire (30% of fleet) out of 267. This shows a very positive picture overall for the level of WAV, although there is a sharp disparity between private hire and hackney carriage provision levels.

Fleet structure

2.26 In 2019, a detailed review was undertaken of the overall fleet structure and number of actual individuals involved in the trade in West Suffolk. However, change to the way statistics are managed for the licensing fleet mean such review is no longer possible.

3 Observable (latent) demand measurement (rank surveys)

3.1 Control of the provision of on-street ranks in the West Suffolk Council area is under the control of Suffolk County Council, rather than directly within the licensing authority. In terms of rank development, there has been no recent change.

3.2 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 they were 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). Initial observations are set out below.

Haverhill

3.3 The Market Street rank in Haverhill is on a section of road (from Camps Road and Swan Lane) marked as being a pedestrian zone from 10am to 4pm Monday to Friday, with the road direction being one way away from Camps Road otherwise). This location was observed to understand potential usage. The signage further along that pointed possibly to the Brook Service Road rank noted in the 2019 report now seems to have been removed. In our observations, we noted that access to the rank was physically blocked off during 10am and 4pm on Saturday, but only covered by the signs on other observed days.

Bury St Edmunds

3.4 While 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. This remained the case from the previous survey. The nature of the road surface at this point (block paving) is not helpful in this regard, nor is the proximity of a cash point and loading bay for the adjacent supermarket.

Brandon

3.5 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.

Distances between centres

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

Overall rank activity levels

3.7 For this survey, a repeat of the methodology for the 2019 survey was followed. This involved covering all ranks from 5am on the Thursday of the survey until 7.59am in the early hours of the Sunday morning.

3.8 A total of 671 (673 in 2019) hours of video observation were collected across the district. An increased two thirds (67%) (compared to 58% in 2019) of these were identified as having no hackney carriage activity at all.

3.9 There is activity at hackney carriage ranks somewhere in West Suffolk during all but eight (11%) (six or 8% in 2019) hours of the 75-hour period starting from early on Thursday morning, only a marginal increase in inactive hours since 2019.

3.10 Fred Archer Way in Newmarket and Haverhill High Street had no active hours at all in passenger terms. However, both saw some hours when vehicles were present. Fred Archer Way appeared to be a waiting rank for the fleet of local hackney carriages, with many observed to return there on regular occasions.

3.11 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 9pm to 1am inclusive and Saturday 9pm to 3am inclusive. There were more passengers observed there on the Saturday-Sunday than the Friday- Saturday and it did operate generally independently to the main rank during those hours.

Detailed analysis

3.12 Some 220 (248 in 2019) hours of video footage were then analysed in detail to provide detailed passenger and vehicle arrivals and departures in hours determined to be active.

Overall rank usage by all vehicles

3.13 At each rank observed, all vehicle and pedestrian movements were recorded, including any use of ranks by non-hackney carriage vehicles. The results are shown below:

	2024	2019	Difference
All events	7,954	10,155	22% less
WHSmith, High Street, Newmarket	28%	37%	Lower share
Cornhill, Bury St Edmunds	27%	24%	Increased share
White Hart, Newmarket	21%	17%	Increased share
All other locations	1 – 5%	2 – 6%	

3.14 This shows overall activity is down by 22% at the current time compared to 2019, with High Street Newmarket seeing reduction in its overall share of activity but Cornhill and the White Hart having increased share.

3.15 Movements observed were then reviewed to identify the kinds of vehicles observed at each rank. 80% (76% in 2019) of all the records were actual vehicle arrivals and departures. The share of these by vehicle type is shown in the chart below:

Vehicle type	Proportion of total	
	2024	2019
West Suffolk hackney carriages	85%	90%
Private cars	10%	6%
West Suffolk private hire vehicles	2%	2%
Goods vehicles	2%	1%
Emergency vehicles	1%	1%

3.16 The principal change is an increase in the number of private cars seen impacting ranks. The main location used by other vehicles was the St Andrew's Street, Bury St Edmunds rank. An increased 46% (was 40% in 2019) of all observed vehicle movements here were private cars. A further 5% (7%) were goods vehicles. 18% (15% in 2019) were identified as local private hire vehicles picking up from this location. Hackney carriage movements here made up 31% (38% in 2019) although there was some evidence that some were pre-booked trips by hackney carriage given the manner that passengers and vehicles met. However, in 2024 the bulk of hackney carriage movements here were vehicles whose drivers used the location to park whilst either using the nearby cashpoint or mainly going to the local shop.

3.17 The High Street rank in Haverhill saw activity from some hackney carriages, with half of these appearing to be wheelchair accessible, but did not see any usage by passengers. It is most likely these vehicles are sitting waiting for bookings from people further along the High Street.

3.18 The Bury St Edmunds railway station feeder rank was not observed this time as it was known that it was nearly always occupied by the burger bar and never used by hackney carriages. It is a council-provided rank originally placed to provide extra spaces for the relatively small private rank on the private land of the station forecourt.

3.19 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 (apart from a visit by one goods vehicle). This was partly due to its high usage by waiting hackney carriages, with the area often being full of vehicles during much of the day, precluding any opportunity for other vehicles to abuse (although its location is also not in any area of demand for other vehicles)

Overall rank usage

3.20 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.

Estimated weekly passenger numbers and share by rank and year of survey

Year	2024		2019		2005
Rank	**Passengers**	**%**	**Passengers**	**%**	**Passengers**
Bury St Edmunds, Cornhill	1,455	43%	1,846	35%	1,900
Newmarket, High Street, WHSmith	1,151	34%	2,332	44%	
Newmarket, High Street, White Hart	338	10%	395	7%	
Bury St Edmunds, railway station	234	7%	303	6%	600
Mildenhall	146	4%	260	5%	
Haverhill, Brook Service Road	60	1.5%	71	1%	350
Bury St Edmunds, Street Andrews Street	17	0.5%	92	2%	30
Newmarket, Fred Archer Way	0%	0%	4	0%	
Haverhill, Market Street	0%	0%			65
Total	**3,399**		**5,303**		

3.21 In 2024, the busiest rank identified in West Suffolk is the Cornhill rank in Bury St Edmunds. This sees an estimated 1,455 total passengers (not journeys, which would be a lower number allowing for groups), or 43% of the estimated weekly total across West Suffolk. This has almost directly swopped share and therefore position since 2019 with the main High Street rank in Newmarket. This sees around 1,151 passengers in a typical week, some 34% of the total flow for the full area. What is stark is the almost halving of passenger numbers at the Newmarket High Street rank, from the 2,332 observed in 2019.

3.22 The next busiest three ranks remain in the same order as in 2019, but now have very different shares compared to having relatively similar shares in 2019. The Newmarket White Hart rank sees around 10% of total passenger numbers (338 passengers), and Bury St Edmunds Railway station 7% (234), both having marginally increased shares albeit of a lower overall total number of passengers. Interestingly, the level of reduction of passenger numbers at the White Hart rank is significantly less than the reduction at the main rank further along the road.

3.23 Mildenhall sees a slightly lower share, around 4%, with 146 passengers estimated per week (down from 260). Haverhill Brook Service Road has marginally increased share to 1.5% (actual numbers only reduced from an estimated 71 in 2019 to 60 now), whilst St Andrews Street Bury St Edmunds had reduced to just 0.5% of the total, seeing passenger numbers fall from 92 in 2019 to just 17 now.

3.24 It should be noted that our observations saw a location just distant from the St

Andrew Street rank (at the corner of Risbygate Street and St Andrews Street North) where the early hours of Saturday and more so Sunday mornings saw hackney carriages clearly waiting and picking up passengers, some of the vehicles having waited at the St Andrews Street rank before moving to that location.

3.25 It was not possible to estimate levels of usage although the hours of operation were 11.30pm-4.30am Friday-Saturday and midnight to 4am in the early hours of Sunday, with activity appearing highest in that period. Any future survey should review and cover that location in addition to St Andrews Street formal rank. We are not aware of any other unofficial ranks in the area, with none being mentioned by the trade, passengers or the licensing authority.

3.26 There are several issues relating to such informal rank operations:

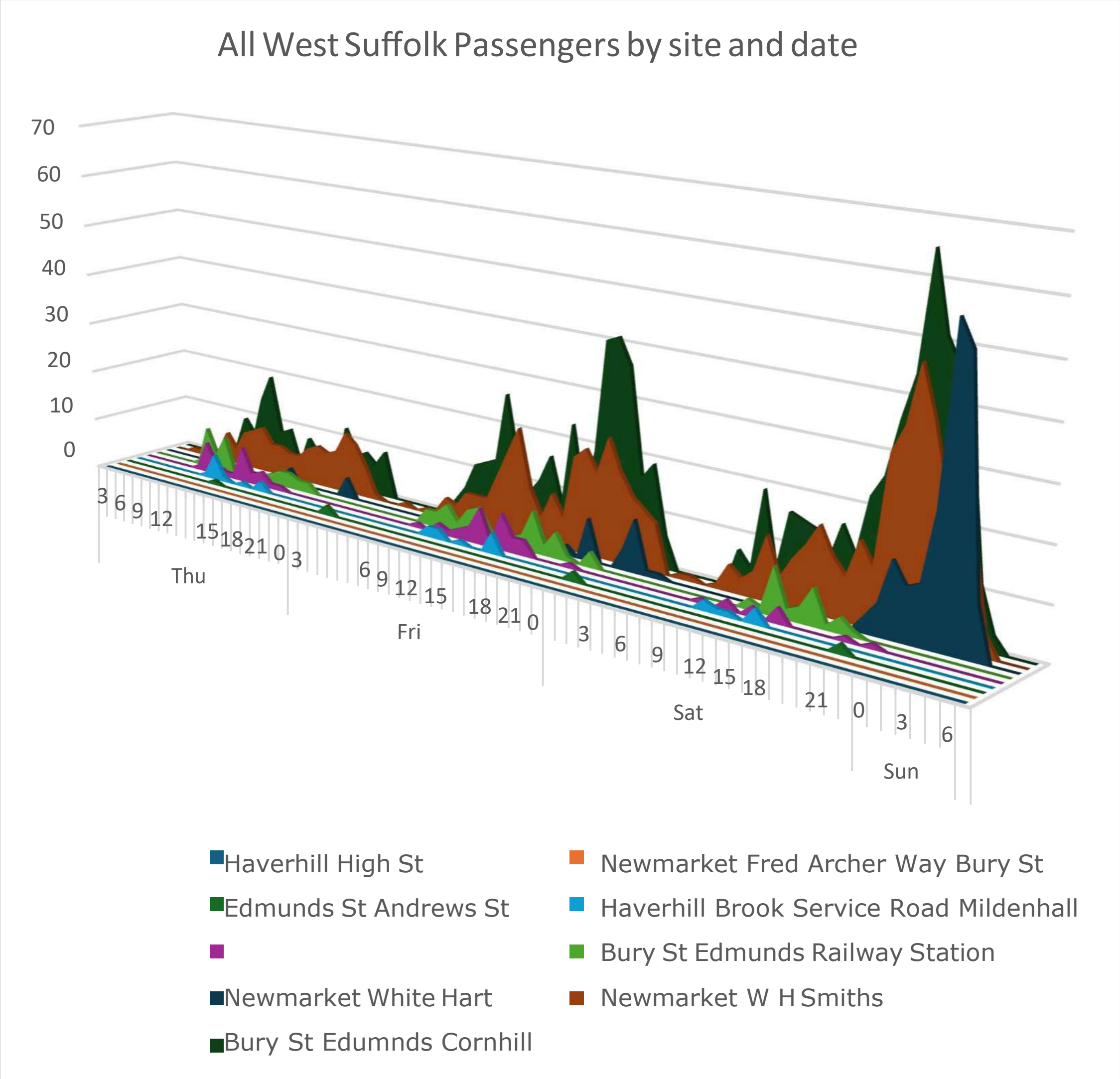
- Levels of usage were not monitored and therefore demand unknown.
- This means our survey underestimates the need for hackney carriages.
- There could be unmet demand occurring at that point.
- It may not be a safe place for a rank.
- Highway revisions might occur removing the location inadvertently if not formalised

3.27 Overall estimated weekly passenger flows in 2024 across West Suffolk at all known active ranks are some 36% down on those observed in 2019. However, this masks wide variation across the ranks. Least reduced in total estimated passenger numbers is the White Hart rank in Newmarket, 15% lower, followed by Haverhill at 16% lower. Bury St Edmunds ranks are 21% reduced (Cornhill) and 23% for the railway station. Mildenhall is 44% lower and Newmarket main rank 51% of its 2019 level, a very high reduction.

3.28 Hires per hackney carriage over the course of the survey are now just 14 per vehicle per week across the whole of West Suffolk – compared to 26.24 in 2019. Vehicle numbers are 21% higher now than in 2019. Were vehicle numbers still the same, the number of passengers per week would increase to 17, showing the main impact is the continued reduction of hackney carriage passengers in the area.

Demand over survey period

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



3.30 The graph above demonstrates that demand still rises generally from Thursday to Friday to Saturday, a typical profile of demand for hackney carriages at ranks. It demonstrates the general dominance of the Cornhill rank in Bury St Edmunds followed by the main rank in High Street Newmarket.

3.31 However, on Saturday nights the Newmarket White Hart rank has its own peak, later than that at Bury St Edmunds Cornhill but higher than the main rank flow in Newmarket. That rank has other peaks on Thursday and Friday, but nowhere as large or dominant.

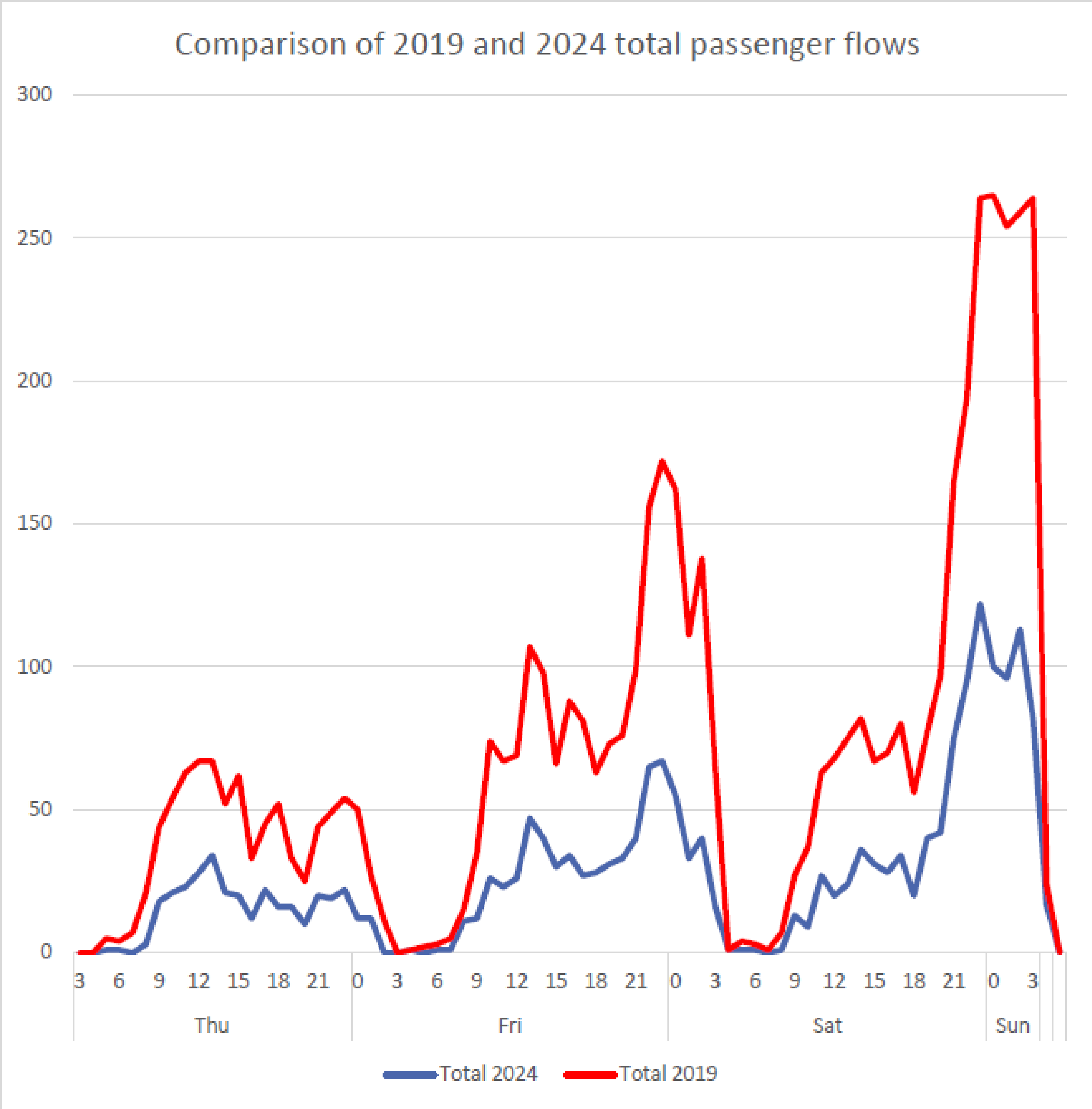
3.32 Mildenhall rank is quieter on a Saturday than either Thursday or Friday but in all cases has a few peaks and a late evening small level of demand both Friday-Saturday and Saturday-Sunday.

3.33 The Haverhill rank tends to have three peaks on both Thursday and Friday, being busiest mornings Thursday and afternoons Friday. Saturday demand is more continuous there. The Bury St Edmunds railway station rank tends to focus on daytimes but with peaks determined by the relative infrequency of the rail service. Bury St Edmunds St Andrews Street is only used later but on all three evenings. As already noted, there is further demand not recorded at the informal rank near to this location.

3.34 In the 2019 data, Newmarket tended to have more peaks than Bury St

Edmunds although in 2024 there is some evidence of this but to a much lesser extent. Further, Bury St Edmunds Cornhill has much higher Friday overall demand demonstrated by the graphs.

3.35 The graph below demonstrates total flows in West Suffolk compared to 2019.



3.36 This shows how much passenger total flows have generally reduced in West Suffolk over the five years since 2019. The graph suggests there is no hour in 2024 where flows are ever higher than those observed in 2019 (but detailed checks show six such instances, but all very minor, with the largest seeing 10 more passengers in the very last hour when passengers were observed).

3.37 However, the overall profiles are strikingly similar despite the depressed nature of the 2024 overall flows. Most peaks and troughs are mirrored very clearly, which suggests the operation and demand profile to be the same, just reduced in level. The magnitude of the peaks has also clearly been reduced.

Comparing daily average flows

Day	2024	2019	Change
Thursday	14	22	62% of 2019
Friday	29	47	60% of 2019
Saturday	43	61	70% of 2019

3.38 This change in pattern may reflect the growth of use of the White Hart rank later on Saturdays. This gap would be further reduced were the unobserved demand in Bury St Edmunds added in (although it is not clear if that same demand was also unobserved in 2019). Overall average flows in 2019, at 27 per hour, are 65% of the 42 per hour observed in 2019.

3.39 However, despite the appearances, the ratio of the peak hour flow to the average three-day flow has increased from 4.33 in 2019 to 4.5 in 2024. The actual peak is lower and earlier, in 2019 it was 182 passengers in the 3am hour, in 2024 the peak is 122 in the 11pm hour. In 2019 there were seven hours with over 100 passengers; including two at 11pm and midnight on the Friday-Saturday; in 2024 there are just three hours with over 100 passengers, all on the Saturday-Sunday evening.

3.40 This means that general levels of demand have reduced, but the difference between typical and peak is increased – making it harder to provide the same level of service. This tends towards increased unmet demand occurring.

3.41 The largest loss of passengers is some 100 passengers less across the full West Suffolk area in the 3am hour on Sunday morning in 2024 compared with 2019. The bulk of this passenger loss was at the main rank in Newmarket. This suggests either a loss of night life or transfer of those passengers to either booked or app sources. Against this trend was the demand observed at the White Hart rank in the early hours of Sunday morning, although the level was nowhere near that of 2019 as noted above. This demand did extend an hour later than had been observed in 2019.

The unobserved demand in Bury St Edmunds also covered the hours from midnight to the 3am hour but could not be identified in detail but we do not believe it would be as much as the apparent loss.

Passenger delay at ranks

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

3.43 For 2024, there were just 23 hours out of the 673 observed when some passengers in those hours experienced a delay waiting for a hackney carriage vehicle to arrive. Ten of these hours saw the average passenger delay (APD) in the hour in question being one minute or more. In 2019 there were a total of 45 hours with 17 seeing APD over a minute. This reduction is consistent with the reduced level of demand observed.

3.44 Looking at the hours with delay, seven of the hours with delay were those when there were low passenger flows of no more than two passengers – periods when it is known to be hard to meet demand called 'thin' demand. These included all but three of the "APD over a minute" hours.

3.45 The worst number of passengers delayed in any hour, 11 people, occurred in the busiest hour of the total survey, and occurred at Bury St Edmunds Cornhill rank in the 11pm hour on the Saturday night.

3.46 Looking at the spread of delay, 44% of total delay occurred on the Saturday, 31% on the Friday, 22% in the early hours of Sunday, and just 3% during the Thursday. 55% of total delay was at Bury St Edmunds Cornhill, 20% at Newmarket main rank, 12% at Bury St Edmunds railway station rank, 8% at the White Hart rank in Newmarket, 3% at Haverhill, 2% at St Andrews Street and 1% at Mildenhall. This review also confirms there was unmet demand at some point at each rank, albeit not very frequently.

3.47 There were just five passengers during the full survey who had to wait 11 minutes or more with the longest observed wait some 25 minutes at the main rank in Newmarket in the 1am hour in the early hours of Friday – but this was an example of 'thin' demand where the person having to wait was the only passenger travelling in that hour.

3.48 Whilst overall this low level of unmet demand suggests the current fleet is more than adequate it should also be noted that the busiest hour, Saturday 11pm, did see passengers having to wait, albeit only at one of the ranks, Bury St Edmunds Cornhill. Further, busy periods at Bury St Edmunds Cornhill in the early hours of Sunday also saw passengers waiting. These suggest there are times when the active fleet is less able to cope with levels of demand. This will be considered further below, with more discussion of the significance of unmet demand in a further Chapter.

Vehicle activity levels

3.49 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, and also for this 2024 survey during the Thursday. 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. A total of 411 different plate observations were obtained, including some at St Andrew's Street in Bury St Edmunds and at Market Street, Haverhill, taken from the recordings of activity.

3.50 There were four sets of observations each day covering 1.5 hours at High Street, Newmarket, three sets of observations on each day at Bury St Edmunds Cornhill and one each day at Bury St Edmunds Railway station, Haverhill Brook Service Road, and Mildenhall. Information was gleaned during the watching of the St Andrews Street and Haverhill Market Street ranks (which covered the full period of observations).

3.51 The aim was to identify the vehicles servicing each location and any trends in terms of comparison to the previous 2019 Saturday observations as well as between sites. Extra morning samples were also added, and the work was undertaken by local council staff to maximise the opportunities available.

3.52 Overall, for all the observations made, 124 different hackney carriage plates were observed and 18 private hire. This is half of the available hackney carriage fleet. In 2019, around 63% to 70% of available hackney carriage fleets were observed just within the Saturday later observations, suggesting a lower activity rate for vehicles at ranks in 2024. This is not what was expected with merging the zones, although there has been a pandemic and other crises since 2019 that have modified and continue to modify the licensed vehicle market and its provision.

3.53 The table below summarises the number of different vehicles observed at different locations in 2024 and 2019:

Ranks	**% 2024**	**% 2019**
Only Cornhill Bury St Edmunds	24%	15%
Only Newmarket (both High Street ranks)	36%	73%
Only Mildenhall	2%	1%
Only Haverhill	11%	1%
Only St Andrews Street Bury St Edmunds	17%	0%
Only Station Bury St Edmunds	1%	0%
Bury St Edmunds Cornhill and station		1%
Bury St Edmunds Cornhill and both Newmarket High Street		7%
Bury St Edmunds Cornhill plus Bury St Edmunds station plus Newmarket both High Street		1%
Bury St Edmunds station and Newmarket both High Street		1%
Total	**93%**	**90%**
Represents number of vehicles	124 (50%)	101

3.54 This demonstrates a strong reduction in the share of vehicles servicing Newmarket, with a higher proportion now servicing only the two High Street Newmarket ranks. There were more vehicles active in 2024 albeit a lesser proportion of the overall total.

3.55 It is interesting to note, that in rank terms, just three vehicles were observed servicing ranks across the former zonal divide (just one vehicle was seen in Bury St Edmunds and Newmarket, and two in St Andrews Street Bury St Edmunds and Mildenhall). Taking all Bury St Edmunds ranks into account, 51% of the observations serviced Bury St Edmunds. This suggests there has not been any spreading of vehicle rank activity across the area with the opportunities arising from the merger of the zones.

3.56 If the levels of demand observed at ranks estimated for a typical week are compared to the share of vehicles observed, there is very close correlation between levels of demand and levels of service. This shows a good appreciation of passenger requirements by the current hackney carriage vehicle trade.

3.57 However, the plate observations only account for half the hackney carriage fleet available for service, although they are only a sample (albeit appearing to be a representative sample). This may suggest the national trend of reducing weekend activity by hackney carriages applies here.

3.58 The table below compares usage by period and day for the two main ranks (showing the proportion of different plates from the total fleet seen in each period):

		Morning	Lunch	Evening	Night
Bury St Edmunds Cornhill	Thursday	6		4	2
	Saturday	3		5	9
Newmarket High Street WHSmith	Thursday	5	7	5	4
	Saturday	4	5	6	9

3.59 The focus of vehicle activity on the Thursday tends to be daytime trade, with lower numbers of vehicles out at night. Saturdays see growing levels of activity as the day progresses, with the highest levels of the fleet being out in the night period. Interestingly in both locations 9% of the fleet are active during the night period. Again, this is based on our sample. The spread does not show any potential shortage compared to demand levels.

3.60 Taking the total number of observations (not the number of different vehicles), 38% of all hackney carriage plates observed were in Newmarket and 33% at Bury St Edmunds Cornhill over the two days. 4% were at Mildenhall, 6% at Haverhill, 8% at St Andrews Street Bury St Edmunds and 2% at Bury St Edmunds Railway station.

3.61 The busiest two ranks saw the total number of observations with 13% Thursday and 20% Saturday at Bury St Edmunds Cornhill rank and 20% Thursday and 26% Saturday at Newmarket High Street WHSmiths. This confirms not just that more plates are active when demand is higher, but that those working are also undertaking more work (which is what we might expect).

3.62 Interestingly, the plate observations saw relatively few private hire vehicles, and none in Newmarket. This difference between areas may relate to the fact that most Newmarket hackney carriages tend to be allied to private hire companies. This is less the case in Bury St Edmunds St Edmunds and reflects the differences in operating models. This may partly arise from the Newmarket area having been longer without any limit on hackney carriage vehicle numbers, although it could also relate to the nature of the operators in each area.

3.63 This also appears to show that the removal of the zones has not changed the overall operation of the fleet, nor the different nature of the separate areas in any way. It was these separate operations which were understood as reasons why merging of the zones might not have had any adverse impact, which seems proven.

Disability usage of vehicles

3.64 Of all the hackney carriage movements observed at all ranks, 7% (26% in 2019) were identified as potentially wheelchair accessible hackney carriage vehicles across the whole of West Suffolk. This is less than the 12% in the hackney carriage fleet (25% in 2019) that is understood to be wheelchair accessible now. Further, levels of WAV (as mentioned in Chapter 2) are now lower in the hackney carriage fleet following the revised policy implementation.

3.65 This comparison also shows the reduced level of wheelchair accessible hackney carriage vehicles in 2024 resulting from the policy change allowing such vehicles to be replaced by saloon style vehicles when changed.

3.66 In terms of spread across the ranks, the highest WAV share was 50% at the Haverhill Market Street rank (although no passengers were observed using these vehicles at this point), 29% at Bury St Edmunds Railway station, 21% at St Andrew's Street Bury St Edmunds, 15% at Bury St Edmunds Cornhill, 14% at Haverhill Brook Service Road, 2% at Newmarket White Hart, 1% at Newmarket Fred Archer Way and just 0.4% at Newmarket main rank. This suggests that the low proportion of WAV vehicles is more severe in Newmarket than in Bury St Edmunds.

3.67 There were just two persons observed entering hackney carriages using wheelchairs during the survey. This was the same as in 2019, although this time one was at Bury St Edmunds Cornhill (none in 2019) and the other at the main rank in Newmarket High Street, W H Smiths (as in 2019). The wheelchair user observed in Mildenhall in 2019 was not observed this time. This suggests that the reduced level of WAV style vehicles has not impacted on their actual usage.

3.68 There were a further 38 (31 in 2019) people observed with other forms of disability being assisted into vehicles – 20 (15) at Cornhill, Bury St Edmunds, 6 (one) at Haverhill, five (none) at the main Newmarket rank, 4 (six) at Mildenhall, 2 at St Andrew's Street, Bury St Edmunds, and one at Bury St Edmunds Railway station. This is a small increase in observed cases of such assistance. This change is not large and does not imply the reduced level of WAV has increased need for driver assistance.

Summary of rank usage

3.69 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. It has been drawn partly from the 2019 survey reporting to provide a record of change since that time, although it must be remembered that this is effectively comparison of two snapshots taken five years apart.

3.70 For the 2024 survey, the busiest rank is now that at Cornhill, Bury St Edmunds. This rank also sees the highest flow in any hour, which also happens to match the peak hour across the area, 11pm on the Saturday night. This rank seems to operate similar hours to 2019, albeit at a lower level of demand overall. Very interestingly, the 2024 peak is in the same hour and just marginally less, 65, compared to some 69 passengers in the 11pm hour on the

Saturday night. The saw-tooth demand profile from 2019 no longer appears to be as pronounced.

3.71 The Newmarket High Street WHSmith rank is now the second busiest location. Formerly providing 44% of total estimate demand in 2019, it now provides 34%, as already noted seeing estimated demand reduce to half its 2019 level. Its former high peak at 3am in the early hours of Sunday morning has now gone and the peak for that rank is now the 11pm hour Saturday, now the same peak hour as at Cornhill.

3.72 This rank continues to be supported by the feeder rank further back along High Street at the White Hart providing extra space for waiting vehicles. A very high level of daytime empty departures from the rank still confirms its supporting role as a feeder.

3.73 However, the feeder rank at the White Hart retains its own demand, but at much reduced level on Friday nights and only in the 1am and 2am hours (was from the 9pm to the 2am hours) and on the Saturday night to Sunday morning from the 7pm hour to the 4am hour (longer than the 2019 8pm hour through to the 3am hour on the Sunday). The peak hour here was now 2am Sunday (was midnight on the Saturday) with 56 (46 in 2019) passengers.

3.74 The third rank location in Newmarket at Fred Archer Way was still mainly used as a waiting area by hackney carriages. There were 52 on the Thursday and 60 on the Friday (was around 40 vehicles in 2019) recorded waiting here for various periods on both Thursday and Friday and around 69 (30 in 2019) on the Saturday. These higher levels may be symptomatic of the drop in patronage at the main rank, with more vehicles waiting longer. This time, no passengers used this rank to depart, although some were noted being dropped off here. As in 2019 there were vehicles left unattended for some while here.

3.75 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 still supported by hackney carriage arrivals even if many did not see any hires resulting.

3.76 The second most used rank in Bury St Edmunds remains that at the railway station. Demand here remained relatively low but generally consistent, with some impact from the still from fact there are two trains in one hour and four in the next through the day. The peak flow reduced from 13 to 9, changing from 9pm Friday to 2pm Saturday.

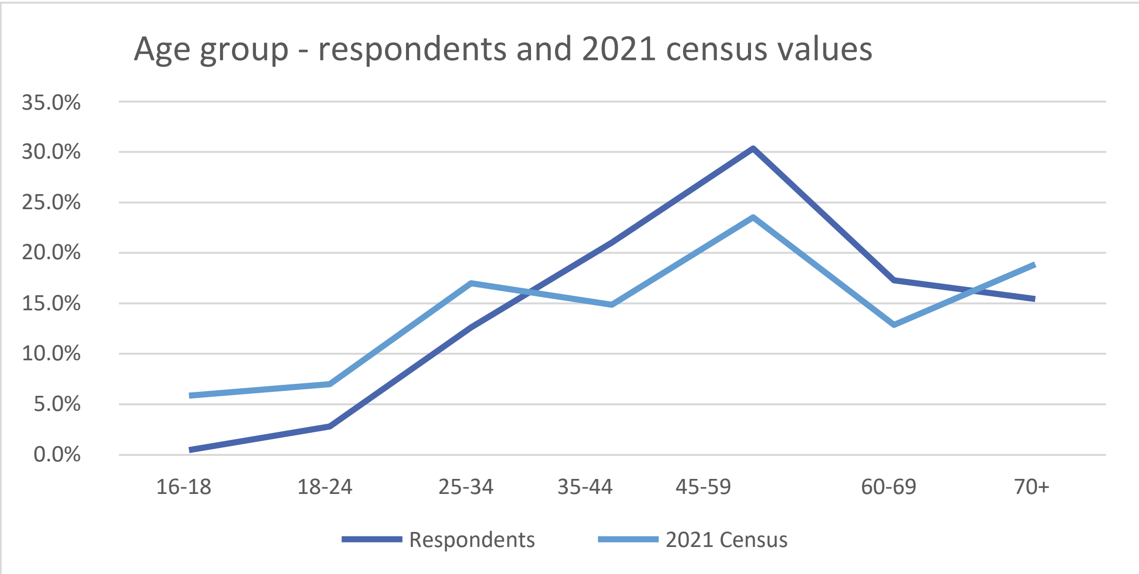
3.77 As already noted above, the overall profile of demand remains relatively similar whilst the major change is the overall reduction of its level. This extends to many, but not all, of the characteristics of ranks. The major change is the high loss of patronage from the main rank in Newmarket followed by the harmonisation of peak hours in both towns to the earlier time of 11pm Saturday, although the White Hart rank peak has moved later to the 2am hour on the Sunday.

4 General public views

4.1 It is very important that the views of people within the area are obtained about the service provided by hackney carriage and private hire. In 2019, standard on-street interviews were undertaken followed by a more detailed opportunity for those with disabilities to respond. For this survey it was agreed that the council would host a general on-line survey that also allowed more detailed response regarding disability need of the licensed vehicle service when appropriate.

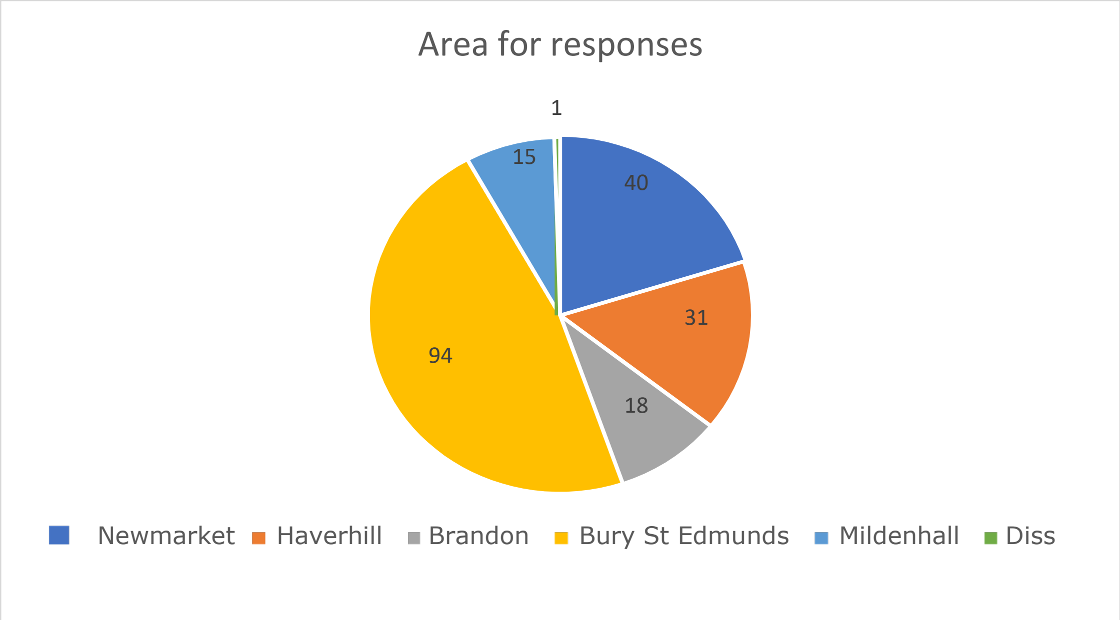
4.2 In 2019, interviews were undertaken on-street in Newmarket, Bury St Edmunds and Mildenhall, obtaining a total of 408 direct interviews on various dates in July, August and September 2019. For this survey, the authority used its various links and contacts to issue a combined public survey including the more detailed questions regarding disability experiences and views undertaken by this latter method in 2019. The questionnaire was completed on-line, and results analysed. 225 responses were received, with the survey having been open until early September 2024.

4.3 Quoted age groups were compared to the 2021 census values for West Suffolk. The youngest three groups were marginally under-represented, with the next three groups marginally over-represented and the final oldest group slightly under-represented. Overall, the general profile of responses by age was well aligned to the population.



4.4 Comparison of quoted gender found an equal split in the 2021 census, but the survey responses saw 15% more from females than males. 8% of respondents preferred not to provide this response, with none stating any other response than these three.

4.5 The areas from which people responded were reviewed. Some misquoted postcodes were revised according to the answers given – none were found to be from out of the area. The set of responses is shown below:



4.6 The largest number of responses were from the Bury St Edmunds area (47% compared to having 23% of population), with next largest being Newmarket (20% compared to 9%), Haverhill (16% and 15%), Brandon (9% and 5.4%) and Mildenhall (8% compared to 4.9%). There was one from the part of the Diss postcode that is within West Suffolk. The numbers shown in the chart are the actual numbers provided.

4.7 It should be noted that postcodes and local authority areas are not an exact match in all cases. This leads to some postcode sectors being shared between authorities – an example for West Suffolk being CO10 8 which straddles the southern boundary of West Suffolk and is shared with the neighbouring authority. There are some sectors shared between several authorities.

4.8 Further, West Suffolk has many settlements that look to other authorities for their main services, including in some cases private hire companies. For example, much of the northeast of the authority is closer to Thetford, and in a contrary manner, many places outside West Suffolk look to Newmarket as their main town. This can very much complicate provision of licensed vehicle services which in this area remains at a local authority level, although the amalgamation of the two former zones has reduced some of this.

4.9 In terms of ethnicity, 86% classified themselves as 'English, Welsh, Scottish, Northern Irish or British'. 7% did not respond. 2% said Indian. The remaining 5% were a range of other ethnicities.

4.10 8% did not say how they obtained the link to complete the questionnaire. 8% had been told by someone else, 7% had been advised about it by the council. 50% had been alerted by Facebook. The remaining 27% were shared out between a range of other alerts, many by group emails or online notices.

4.11 Interviewees were asked if they had used a licensed vehicle in the area in the last three months. 72% (57% in 2019) said that they had – an increased level although it is normal for on-line surveys to mainly be completed by users rather than the non-users that are picked up in random on-street survey work.

4.12 44% of respondents said they used private hire vehicles, 33% used both hackney carriage and private hire, 19% used hackney carriage, and 3% said they did not use licensed vehicles at all.

4.13 Almost 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 2.3 (1.5 in 2019), increased and moderate. The most frequent quoted usage, with 24% (22% 2019), was that people used them no more than once or twice a month. 4% said they never used licensed vehicles (15% 2019) whilst 5% said three or more times per week (3% 2019) and 11% (9% 2019) once or twice a week. Again, part of this increase could relate to less non-users responding as shown by the reduction of the level of those saying they never used them in this survey.

4.14 People were asked how they normally got a taxi. 6.5% did not give any answer whilst 69% gave a single answer. A few provided non-standard responses, one messaging a driver directly and another saying contacting a driver they knew, and another saying they found licensed vehicles impossible to use. One person gave five responses, 4% gave three and 20% gave two.

4.15 For West Suffolk, 22% (a third in 2019) of the responses (for some of which people gave more than one response), were that they got a licensed vehicle at a rank. 1% (3% 2019) said they hailed, suggesting a total of 23% (36%) for hackney carriage (lower than in 2019, but still a moderate level). 58% (53% 2019) telephoned, 2% (5% 2019) used a freephone and 14% (5% 2019) used an app. 1% (same as in 2019) said they never used licensed vehicles at all. For this survey this suggests app usage has impacted on rank and hailing use, reducing both.

4.16 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 183 – but a lot less than the 450 of 2019 different mentions of company names were obtained.

4.17 There were just four (three in 2019) companies that received more than 7% of the total responses. These received 26%, 20%, 10% and 8% (20%, 15% and 13% in 2019) of mentions. The top three companies were also mentioned in 2019, with two having increased share but one reducing share (and therefore swapping places with the other company). The company gaining 8% was new for the 2024 survey.

4.18 The company scoring next highest, 5% of responses, was in the same position as in 2019 in the table although its share had reduced from 7% then. Two companies gaining 3% of the mentions now had also received mention in 2019, one with 6% then, and another with just a single mention then. The other 2024 company with just under 3% of mentions was new this time.

4.19 Five companies scored 2% of the responses, of which three had been mentioned in 2019, one with 7% then, one with 1% and the other with a single mention. Five companies gained two mentions, or 1.1%, of which two were also mentioned in 2019. One of these was from a neighbouring authority but serviced an outlying village.

4.20 Twelve other companies gained a single mention, of which four had received similar levels of mention in 2019. One of these – a national app – had reduced its share from 6% in 2019, surprising given the increase in app usage quoted.

4.21 31 other companies mentioned in 2019 gained no response in 2024.

4.22 All this response suggests a very changing company scene in private hire operations in West Suffolk, albeit with relative similarity for the small number of most quoted companies. As is typical nationally, the top two companies have gained in popularity. Interestingly, one of the companies only named in 2024 was found to be a one-man band who had retired just before the survey took place. There were two new entrants who had gained good reputations.

4.23 In this survey, this question was also used to express peoples concern that phoning for vehicles was quite frustrating. At least six responded that they had to try numerous companies before getting a positive response. Two told us companies they no longer used due to bad experiences, and another said they contacted a large company but asked for known drivers only. One tried to contact someone that would take them in their wheelchair, often to no avail.

4.24 Overall, the picture of company-based operations tends to raise public concern, with one person saying, "I have given up phoning" and another "I would like you to tell me some companies I could phone".

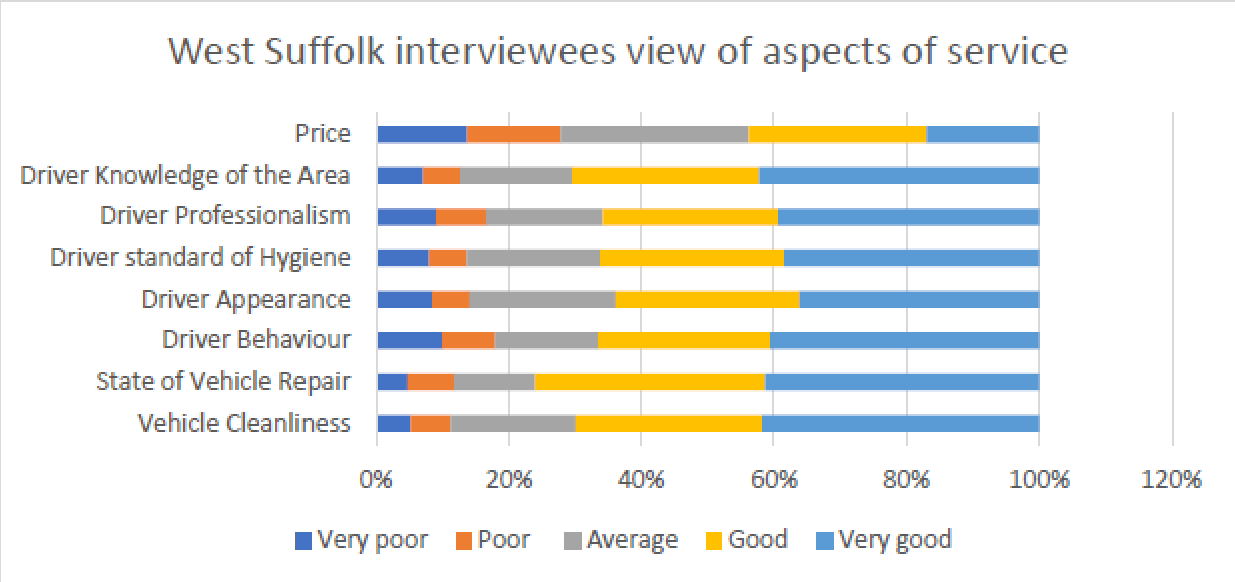
4.25 One person said they did not trust apps, another that they had tried an app but found it did not work for them, two said they used them but did not say who, one named three companies, another named two, and seven said 'any'. Six different company apps were named (five last time). The top company was named ten times, the second and third equal gained eight mentions each (one a national app). This suggests local apps have regained ground against the one national app appearing to be active in the area. However, one said they would try each app to find the cheapest and another would try the apps in order to try to find a wheelchair accessible vehicle suitable for them.

4.26 Two people took the opportunity to say they would identify details for wheelchair accessible vehicles using the West Suffolk website but found it difficult as this source was not currently available.

4.27 The top two known ranks obtained 50% of responses for Cornhill, Bury St Edmunds (35% in 2019) and 36% (34%) High Street in Newmarket. Bury St Edmunds Railway station is now third but with just 8% of rank mentions (was same in 2019), with Mildenhall the last rank noted (6% now, was 14%). There was no mention of Haverhill at all in terms of ranks being used (was 3%) despite 16% of respondents saying they were from there.

4.28 Five people said they used ranks, but each named two companies rather than any rank. Eleven took the opportunity to confirm they did not use ranks. One said they would use a rank if vehicles were there at Bury St Edmunds Railway station. Four took the opportunity to advise us there was no rank in Brandon.

4.29 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', as in 2019, although this time the rankings of 'very poor' ranged from 5% to 14% (when they had been zero in 2019), with price getting the highest 'very poor' score. Other than price (where the 'very good' score was just 17%, and the highest scorer 'average' (28%), the lowest very good score was driver appearance (36%) with vehicle cleanliness and driver knowledge of the area both gaining 42% very good scores. These results are shown graphically below:



4.30 With respect to periods people found it hard to get licensed vehicles, 32% said 3pm to 6pm, 29% 6pm to 6am, 23% 6am to noon with the lowest value 11% for the noon to 3pm period.

4.31 In terms of feeling safe, just 2% did not feel safe during the daytime, increasing to 15% overnight, with 53% saying they never felt unsafe. Just 4% were unsure.

4.32 27 people provided additional detail regarding when they felt unsafe. However, six of these were confirming they felt safe, with one explaining that the company they used advised them of the registration plate of the vehicle coming to them, which helped them, an excellent practice.

4.33 Of these remaining 21 (out of 225 total responses, 9%) six were females who did not feel safe with the driver either not speaking with them or making them feel uncomfortable and observed. There was one claim of very poor behaviour by a driver towards someone's daughter. Three were made to feel awkward by use of unusual routes. Two were concerned over the standard of driving. One had concerns waiting at a rank with no vehicles there, and three said they felt unsafe because they could not get a vehicle at night, or because they were refused a short journey late at night and ended up walking home. One made the point that some drivers locked doors until they had been paid at the end of the journey. None of these appear to have reported their concerns.

4.34 51% of those responding said they would consider using an electric powered vehicle, even if it cost more. This was higher than the 3% saying this in 2019. Those saying they would not use them said:

- Five people concerned about risk of fires or running out of charge
- 39 said they should be lower, not higher, fares with many feeling higher

fares were not correct

4.35 Twelve provided positive support to use of electric vehicles. Two pointed out the company they used already had such vehicles. One reported that not only was the vehicle electric, but the driver also provided helpful and polite service.

4.36 42% of respondents provided information about their waiting times at ranks. Of these 42%, 26% said there was no need to wait, whenever they had gone to a rank there were always vehicles there. 34% said up to five minutes, 19% five to ten minutes and 21% ten minutes or more.

4.37 40% (70% in 2019) of those responding felt that people in the West Suffolk area that had disabilities got a good service from hackney carriage vehicles and drivers. 60% (4%) said they felt they did not. However, of the total responses, 48% did not respond, 25% did not know, 16% felt they did not and 11% felt they did. This seems to suggest a significant worsening since 2019, although this could also be due to the questionnaire being more available to those needing disability specialist services.

4.38 23% (6% in 2019) of respondents across the area said they had given up waiting or made alternative arrangements when trying to get a hackney carriage from a rank in the area. However, five people were clearly quoting waiting for a booked (therefore private hire) vehicle, another was clearly not a rank or hail booking, 11 gave no rank location and one was seeking a booked WAV.

4.39 This reduces the total experiencing latent demand to 33 made up of:

- 12 at Cornhill, Bury St Edmunds
- five at the railway station, Bury St Edmunds
- both at the railway station and at Cornhill, Bury St Edmunds
- 10 at Newmarket (many early in the mornings)
- four at Mildenhall

4.40 This provides an overall latent demand factor of 1.15; with that for Bury St Edmunds Cornhill 1.05, Bury St Edmunds Railway station 1.02, joint Bury St Edmunds ranks 1.01, Newmarket 1.04 and Mildenhall 1.02. This is higher than the 5.6% of 2019. Bury St Edmunds Cornhill has the highest level, but Newmarket is not far behind.

4.41 Most told us the options they took if they walked away from a rank. 45% walked, 18% made a private hire booking, 14% phoned friends or relatives, 9% caught a bus, 5% each either used an app, used the race day bus, or (worryingly) used someone they said tried to fill in the gaps in licensed vehicle services to increase their income (who appeared therefore to be unlicensed and operating illegally in Mildenhall).

4.42 People were asked how they would sum up their experience of using licensed vehicles in the West Suffolk Council area. 70% did not answer. Of those providing an answer, 31% said satisfactory, 28% bad, 24% good, and 9% said either very bad or excellent. This is generally a balanced response with the focus only slightly towards negative.

4.43 Questions then moved to those who had long-standing disabilities, or issues that meant they needed adaptations to the private hire service to allow them to use the service.

4.44 30% of respondents said they had a long-standing illness, disability or infirmity. However, two people said they had but provided no further information or viewpoints, whilst three others provided no further information on their condition but gave views about disability service requirements. These have been deleted from the continuing discussion.

4.45 79% of those saying they had a long-standing illness, disability or infirmity told us of aids they needed. 2% - one person- needed five of these aids, 6% needed three, 32% two and 52% a single aid. Of the total mentions of aids needed, 36% needed walking sticks or crutches, 16% a chaperone or carer, 15% a wheelchair at all times, 12% hearing aids, 8% an assistance or therapy dog and 7% a wheelchair some or most of the time. This is a good range of responses from the sample, making it representative of a wide range of need.

4.46 Ten statements were provided to allow people to explain their specific needs when travelling by licensed vehicle, plus opportunity to explain further if the statements were not sufficient. Two people added extra comment, one saying they needed help in and out of the vehicle and the driver folding and safely stowing their walker or rollator in the vehicle. Another said they needed drivers to speak clearly, be polite and helpful. One person said they needed all ten statements to be true. Another gave five, 5% gave four, 16% three, 23% two and 52% just one.

4.47 Of the total responses to this question (consisting of ten responses), 12% of responses were from wheelchair users that would need a WAV. 5% were wheelchair users who would not need a WAV. 18% said they found it hard or impossible to step up into larger WAV style vehicles and would therefore need a saloon-style vehicle. 3% would need the driver to help them transfer and to then store their wheelchair safely.

4.48 The most quoted requirement was a text message advising the vehicle had arrived, with 19% of responses. 17% said the vehicle arriving on time was important to them. 9% would need the driver to assist them in walking to the vehicle. 7% would need the driver to either knock on their door or to call them once they had arrived. 6% would need assurance from the operator booking the journey that a vehicle and driver would be able to carry them with their assistance dog. 5% would need someone to advise another person that the passenger had been collected and had safely been delivered to their destination. These responses again confirm a wide range of need even for such a small sample of people.

4.49 Eight statements were then made relating to refusals, extra charges or being made to feel uncomfortable by drivers. There were at least four people mentioning each of these statements, which is concerning. One person said all eight applied to them. Another person said five applied, and another three. 10% said four applied, 17% two and 62% saying just one applied.

4.50 There were a total of 52 mentions for the set of statements. Of these, the most common statement was for 21% of people who said they had been made to feel uncomfortable by a driver due to their disability (11 people). 15% said they booked through an operator but were refused travel when the vehicle arrived. 13% (each) said either they were refused by the operator on booking, or the driver refused to take them because they were travelling in their wheelchair. 12% said they were ignored when trying to flag down a vehicle. 10% said the driver refused to take them as they had an assistance dog (five people). 8% each said either they had been refused due to some other aspect of their disability or had been charged more due to their disability.

4.51 Again, these responses are overall disturbing with some highlighting illegal actions by drivers. However, what is perhaps more alarming is the lack of any known reporting of these matters to the licensing section.

4.52 People were then invited to choose from seven changes that might help improve the situation, with opportunity to add other statements as appropriate. 57 people responded. Just one person who did not answer the question 'do you have a long-standing illness, disability or infirmity' gave a response, all others were those that had answered 'yes'. 12% suggested all should apply. 5% said all but one, 14% five, 12% four, 16% three, 23% two and the remaining 18% just one.

4.53 A total of 192 responses were received from the 57 people. The most popular response was 20% saying there should be disability awareness training for drivers. 18% said this should apply to operators. 17% said any driver or operator proven to actively discriminate against disability should have their license revoked. 13% said more WAV and a further 13% more council enforcement action. 10% asked for a wider range of adapted vehicles, particularly those not so high off the ground. The final 9% sought better used of smartphone apps. No-one suggested any 'other' responses.

4.54 People were given opportunity to provide additional comments at the end of completing the survey. They were also given opportunity to respond to any points which they had either rated poor or very poor and separately if they rated any items good or very good. Initial inspection found similar responses within each of these three opportunities so are reviewed together below.

4.55 89 additional comments were made across the general questionnaire at the end. 46 comments were made in the section 'rated good...' and 73 'rated poor…'. In the additional comments, just eight were positive. In the 'rated good' responses, 28 were positive and 11 were positive but also had negative points to make. In general, the overall responses tend towards being quite critical although that can be the result of seeking response on-line, whereby only those with interest tend to respond.

4.56 All the positive comments have been drawn together to highlight several ways in which the current fleet can be applauded. It must be made clear that the following statements where in quotes are the views stated by respondents and not the view of this report or the council. All need to be taken in context that they are electronic responses although we have tried to ensure there is no attempt to multiply either good or poor responses in any way that provides doubt on the matters stated.

More information if 'good or very good'

4.57 Of all the respondents, 40 (18%) took time to make specific positive comments in the question asking for further information for any of the aspects of service they had rated 'good' or 'very good'. Of these, nine people were very specific and personal (4% of all respondents) (quoted verbatim, but with some grammatical and spelling changes):

"Helpful driver, mother aged 90 with mobility issues allowed time and support for her to get in taxi."

"Driver text when outside, very handy rather than waiting outside for them when raining. Arrived at agreed time. Knew where he was going around town."

"Reliable, flexible when plane was late, lovely when taking my elderly mother home."

"My experience was excellent! Very friendly service, he was respectful and made me feel safe."

"Never had any issues with either type of taxis. Never felt unsafe (have travelled as a solo female passenger). Drivers have always been very nice and friendly and cars very clean. Prices have gone up, but I guess that is part of the current economic climate we live in and it is their likelihood."

"Turned up to village location on time friendly driver no problems."

"The taxi driver was really friendly and professional, offered to help with bags and so on."

"We are regular users, generally happy with the service and reliability."

"One driver seemed very polite and friendly and did not over-engage in conversation."

4.58 Nineteen further positive comments of a more general nature were made, accounting for some 8% of all respondents:

"Cleanliness of the vehicles." "It was clean." "Always clean car."

"All taxis I have used are up to standard." "Cars and drivers clean and polite."

"Clean car inside and out, driver well-mannered and polite, nice journey and fair price."

"Driver and vehicle clean, smart, good time keeping and friendly." "Generally professional excellen.t"

"Generally speaking, good." "Good for time keeping." "He was nice and polite."

"I use xxxx (name supplied). usually prompt and helpful." "Reliable always."

"The drivers are always chatty and amenable and get to know you."

"The drivers have always been friendly, courteous and well presented."

"The taxi drivers have always been very nice, friendly but professional, the cars are always clean."

"They are friendly, helpful and cheerful" "Very good all round, good service." "Given the limited transport options in Haverhill - no rail, poor bus services and low-quality road maintenance, taxis are essential to many residents."

4.59 Another, more general comment was made (included in the positive set)

"drivers are generally polite when allowing pedestrians to cross the road".

4.60 Also within the positive comments were a group of 11 that were positive but continued to move towards concerns after making positive statements (4.9% of total respondents) (again, broadly verbatim with some strong viewpoints that express inappropriate comments, but need to be said as they are what people told us):

"Generally, cars are clean. However, in past have been on dirty cabs in area. Once stopped by police as cab had bald tyres."

"Generally, I think a reasonable service is provided, easy to book and except at peak times quite punctual! Driver attitude varies from very good to acceptable. Prices have risen and now expensive especially after 12."

"I use taxis as I don't drive if I did drive, I wouldn't be using them. xxx are by far the most reliable turn up on time but never have availability."

"It's good if I can actually get a taxi."

"There are some very good drivers but lately there are some awful ones that have absolutely no idea where they are going and Don't understand English."

"There are some local taxis, and the drivers are from around the town who are fantastic. They can't do enough for you. They really do belong in the community as they are part of it. Please can we have more locals."

"Always friendly. I never get in a minibus as the drivers never understand me and I can't get in one very well."

"I now only use 1 taxi driver as she is fair and never overcharges. I'd rather wait for her than use a rank taxi."

"I only use taxis who I know that is very important to me because I know I can trust them. Shout out to xxx of yyyy and to aaaa who used to be in bbb cars (names supplied)."

"Polite professional service if you can manage to get a booking."

"The one wheelchair taxi we can get is very good, and patient, taking really good care of my son."

4.61 One person made a point that a nearby authority has a good wheelchair accessible taxi list that advises how to contact them and which areas they serve.

4.62 Six people placed negative comments in the 'if good or very good' section:

"Being disabled all my life has relied on taxi service. I'll not condemn any but with a hearing issue, I do struggle with different languages. This is not an attack on multi-cultural identity but rather an issue that impacts my own situation."

"More availability and disability awareness."

"Living in Stanton it cost £25.00 over to get to or from Bury St Edmunds Hospital charge is considerably more."

"Some drivers seem to lack local knowledge use sat nav on phones." "Nothing is good about taxis in Bury St Edmunds." "Zero (is good), absolute dregs."

More information if 'poor or very poor'

4.63 For the section seeking extra comment for any items respondents said was 'poor' or 'very poor', 34% provided detailed negative additional comment. This amounts to 76 people. Some provided more than one negative issue, with a total of 123 different mentions of some 70 different issues.

4.64 The most frequent issue was expense (20 mentions), then poor driving (5), going the long way round, a poor driver attitude, or a smelly vehicle (4 for each), poor base to driver communication, poor driver communication, not having many vehicles in rural areas, inattentive drivers, poor call centres, poor local knowledge and vehicles being generally hard to get all had three mentions each.

4.65 Two mentions were obtained for being required to pay cash, disabled people not being assisted, drivers being impatient, car interiors being dirty, an inability to book, a feeling that the passengers' custom was not wanted, with longer journeys preferred, the vehicle being smoky and passengers feeling unsafe.

4.66 There were 50 other issues mentioned just once by these public respondents. Three were serious – someone saying the vehicle did not turn up when they told the person they had an assistance dog, another being refused travel because they had a walking aid that would not fit in the vehicle, and the final person having a friend visiting them refused a hackney carriage journey from a rank.

4.67 Many related to vehicle shortages, to issues with driver or vehicle standards and some relating to matters that might be put right by publicity (for example not thinking there was a rank at Bury St Edmunds railway station, being unable to access or use apps, or knowing where ranks were in either Haverhill or Bury St Edmunds, or what vehicles, operators, drivers might meet their needs).

More information from the 'any other comments or examples of positive or negative experiences while using taxis in West Suffolk' section

4.68 Reviewing the final 'other' comments did not add any other significant additional issues not already mentioned. The point about a shortage of WAV style vehicles was reiterated by seven people in the general comments. Further details of times and locations where getting licensed vehicles was also given (mainly private hire bookings, but also rank-based trips particularly early in the mornings from Newmarket).

4.69 Three people reiterated they felt there were never hackney carriages available from Bury St Edmunds railway station. Several made it clear that licensed vehicles were a very important part of the transport mix of the area, particularly given that many bus services were either infrequent or did not always run.

4.70 Two people expressed concern at the burden to the trade of requiring more WAV style vehicles in the fleet, although again the viewpoint seemed to be a misconception of the current actual policy.

4.71 Eight made positive points about the service provided, including some very good and appreciated examples of service provided.

4.72 There were four specific comments regarding people feeling their driver did not have sufficient command of English:

"Being a female alone its very unnerving when drivers cannot speak English."

"The ability of drivers to understand English and know the town and area."

"A lot that are not English or speak English well."

"Amazes me that they even get (a licence) with their limited English."

4.73 Although there has been a lot of feedback, it suggests the need for a regular method by which people can engage with licensing to pass on their comments. It also suggests the need to improve engagement between those needing licensed vehicles, those regulating them and those providing the service. Further discussion is provided in the synthesis section of this Report.

5 Key stakeholder consultation

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

- supermarkets
- hotels
- Pubwatch, individual pubs and nightclubs
- other entertainment venues
- restaurants
- hospitals
- police
- disability representatives
- rail operators
- other council contacts within all relevant local councils.

5.2 Comments received have been aggregated below to provide an overall appreciation of the situation at the time of this survey. In some cases, there 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.

5.3 Key stakeholders were contacted both by the local council and LVSA. Our target stakeholders are as far as possible drawn from across the entire licensing area to ensure the review covers the full area and not just specific parts or areas.

5.4 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.

Respondents

5.5 A total of 36 key stakeholder respondents were obtained. They were made up of:

- seven supermarkets
- five hotels
- one hotel and pub
- 13 pub, club and bars
- four entertainment sites (a heritage museum, the racecourse, a bowling alley and a theatre)
- Bury St Edmunds railway station
- NHS patient services
- three restaurants
- one village hall

5.6 With respect to geographic spread, 53% were from Bury St Edmunds, 19% Newmarket, 11% Mildenhall, 8% Brandon and 3% each from Ousden, Lakenheath and an unstated location. There were no respondents from Haverhill.

5.7 In terms of sectors the respondents said they were from, 83% said they were business owners or employees, 11% provided accommodation, with 3% from the health care sector, and 3% being from Bury St Edmunds railway station.

5.8 14% said that both staff and their customers used local licensed vehicles; 81% said their customers or service users relied on local licensed vehicles to access their businesses or services with the remaining 5% (two respondents) giving specific responses. One (the village hall) said their attendees mainly walked to the site or came by their own transport, with another saying most people either walked or drove to their location, with them only having to call one licensed vehicle within the last three years.

5.9 Respondents told us how their customers, staff or service users obtained local licensed vehicle services. 44% of the respondents gave a single method, 31% gave two, 11% gave three, 8% four methods, 3% gave five methods and one (the village hall) said local licensed vehicles were not used.

5.10 One said they had a list which they gave people if they asked, another had cards for one company, and another said that people checked the time they would need a taxi and then booked one to arrive at the expected time.

5.11 Of all the quoted methods of getting local licensed vehicles, 30% were by people asking staff to book a vehicle, 28% that people went to ranks, 23% used their own mobile phone, 9% used the location phone, 5% used an on-site free phone, 3% used an app or website and 2% (just for one location) said people hailed.

5.12 With respect to single methods, the largest was for people asking staff to book (six responses), then using a rank (four), with two each for using the site phone and using the site free phone with none saying they only hailed, or they only used an app or website.

5.13 The number of companies quoted was very small – just seven different names were given. Two of these were using free phones, with just two respondents naming two companies.

5.14 39% of key stakeholders told us days and times they felt demand for taxis was higher. The busiest times were (no. of respondents quoting in brackets):

- Friday overnight (10)
- Saturday overnight (9)
- Thursday overnight (5)
- Monday mornings (4)
- Thursday mornings (4)
- Tuesday mornings (3)
- Wednesday mornings (3)
- Friday mornings (3)
- Wednesday overnight (2)
- Friday afternoon (2)
- Monday afternoon (1)
- Tuesday afternoon (1)
- Wednesday afternoon (1)
- Thursday afternoon (1)
- Saturday afternoon (1)
- Monday overnight (1)

- Tuesday overnight (1)
- Saturday morning (1)
- Sunday morning (1)

5.15 None said any mid-day period was ever busy, nor any time on Sunday other than mornings.

5.16 In terms of times people found it hard to get taxis, key stakeholders suggested (number responding in brackets):

- Saturday overnight (11)
- Friday overnight (10)
- Monday to Friday afternoons (4 per day)
- Thursday overnight (one)
- Sunday mornings (one)

5.17 A third of key stakeholders, 12, said they thought people had given up waiting for licensed vehicles. All told us what arrangements they believed people had made. These included:

- person walked
- person walked (or advised to walk) to a rank (2)
- on race days suggest people go to rank
- return for a further drink but watch rank (1)
- staff taking people home (2)
- arrange for lifts to be provided
- arrange shifts so staff can go home on public transport
- a staff member contacted a friend who was a taxi driver
- main issues are when vehicles are serving school contracts in afternoons (2)

5.18 Many of these comments seem to relate to difficulty in getting booked licensed vehicle trips rather than rank-based trips, with people sent to ranks to overcome the issue, but other references are clearly to shortages at ranks. It is concerning that four of the responses meant key stakeholders had to take actions to overcome known shortages – sometimes making taxi style arrangements by their own staff or other people. The need to arrange shifts around public transport times rather than use flexible licensed vehicles is also a strong concern.

5.19 No key stakeholders reported ever having an issue with not being able to get wheelchair accessible vehicles for customers, with one saying they had recently managed to book a customer needing a wheelchair accessible vehicle successfully. Another said their main wheelchair bound customer had not come recently.

5.20 The railway station said their issues were app-based drivers driving around the nearby roads waiting for app bookings, and a shortage of vehicles with permits meaning other local hackney carriages picked up without a permit.

5.21 Two mentioned issues on race days in Newmarket. One reported a wait of over an hour for vehicles to arrive, and another up to three hours if at afternoon school times.

5.22 Another reported they would check the internet for a taxi company contact if customers asked – but did that only rarely. Another said their free phone had been removed and that demand for licensed vehicles had been reduced by the implementation of a local community bus.

5.23 Another said that accessible vehicles needed to come to their rear yard, but that it was always full of parked vehicles or loading vehicles. That stakeholder also said they had found unhelpful drivers, particularly not helping those in wheelchairs, but gave no more information.

Supermarkets

5.24 Responses were received from three Bury St Edmunds, two Newmarket, one Mildenhall and one Brandon supermarket. All said their customers used private hire vehicles. One in Newmarket told us they had a free phone.

Hotels

5.25 Two Bury St Edmunds, two Mildenhall and one Newmarket hotel responded. All said customers used private hire vehicles.

Public houses, clubs and bars

5.26 Nine Bury St Edmunds, two Newmarket, one Brandon and one Lakenheath responses were received from those saying they were pubs, clubs, or bars. From these, eight said customers mainly used private hire whilst five said they mainly used hackney carriages.

5.27 The Lakenheath location struggled to get licensed vehicles feeling the local companies did not feel (their) smaller journeys were necessarily worthwhile, with a focus on them undertaking (presumably military) contracts.

5.28 One location (saying it was mainly hackney carriages) and one in Brandon (saying mainly private hire) said they ended up taking customers home if taxis were not available.

Other entertainment venues

5.29 A bowling alley in Brandon, a theatre in Bury St Edmunds, the racecourse in Newmarket and another unknown location heritage attraction responded. All mainly used private hire. The Brandon location said use of licensed vehicles was very rare, with most people walking or using their own vehicles.

5.30 The village hall in Ousden responded but said most of their attendees either walked in from locally or drove.

Restaurants

5.31 Two restaurants in Bury St Edmunds and one in Newmarket responded. All said customers used hackney carriages.

Hospitals

5.32 A patient services representative responded. They told us their patients mainly used private hire vehicles. They had a free phone to one company but would phone another if there were long delays quoted.

Railway station

5.33 Bury St Edmunds railway station responded. They said most of their customers used the rank, but also made comment of issues with vehicles with apps driving around to obtain bookings, and lack of service by the vehicles with permits that meant some passengers ended up leaving in other hackney carriages that did not have permits.

Police

5.34 No comment was made.

Local disability forums

5.35 No comments were provided.

5.36 Other comments made included:

- one location having a scheme using taxis to ensure people they considered vulnerable could get home by taxi, but which they could not remember when they last had to use
- another location said a local company was no longer interested in smaller fares which meant a lot of their users ended up walking home.

6 Trade stakeholder views

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

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

6.3 Most current studies tend to issue a letter and questionnaire to all hackney carriage and private hire owners, drivers and operators. This is best issued by the council on behalf of the independent consultant. 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.

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

6.5 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.

6.6 Copies of the letter and questionnaire were issued by the council on LVSA's behalf to all drivers, owners and operators across West Suffolk. A total of 63 (54 in 2019) responses were received. There were three duplicate responses (removed) and some who provided additional information through additional responses (retained).

6.7 Two told us they either were not presently working or did not have a vehicle at the time of responding. 86% told us the type of vehicle they were operating from the choice of WAV, EV, HEV or other (with the option to choose more than one option if relevant). None chose more than one option. 20% had a WAV, 15% a hybrid, 4% and EV and 61% gave specific types of vehicles, most of which were stated as being diesel powered.

6.8 94% told us if they owned their own vehicle or not. Of this 94%, 82% said they did own their vehicle. This was marginally lower than the 89% stated in 2019.

6.9 When asked what matters affected when they worked, 90% provided at least one answer. Of those giving at least one response, 47% provided two, 28% a single response, 19% two responses and 5% four responses.

6.10 There were six specific responses, 'I'm not a morning person', 'when there are less vehicles at ranks', 'health issues', 'airport runs only', 'when my operator gets bookings' and finally 'as much as I can.'

6.11 Of the other six specified responses (which accounted for a total of 125 responses), 22% (19% in 2019) of these were 'personal preference', 22% 'regular bookings', 21% (23% in 2019) 'family', 10% each for times of high demand (was 16%), avoiding busy traffic periods (was 18%) and when they were given a shift by their operator, and 7% said they avoided disruptive customers (same as in 2019). In 2019, 1% said their operating times were restricted by them sharing a vehicle – none said this in 2024. These responses suggest the reasons people work have not really changed since 2019.

6.12 Most hackney carriages told us the ranks they serviced, some giving more than one response. In 2024, 60% of respondents named the area, or areas they worked. 37% (49%, in 2019) said Newmarket with 29% saying Bury St Edmunds (same as in 2019). 8% (9% in 2019) said they served Mildenhall whilst a further 11% (9% in 2019) said they serviced Haverhill. One response was for Bury St Edmunds and Haverhill (3% of total), two for Bury St Edmunds and Newmarket (5%), two (5%) just said 'town centre' (but it was not possible to understand where). One said they worked 80% of the time in Newmarket with 10% in Mildenhall and 10% in Bury St Edmunds. A further response was one driver saying they mainly worked in Mildenhall but using phone bookings. Again, these responses are relatively similar to 2019. The notable exception appears to be a reduction in service for Newmarket.

6.13 For all respondents, 29% (33% in 2019) said their main method of getting fares was from the ranks, and 29% (33% in 2019) from telephone bookings. 5% (2% in 2019) said from hailing whilst 18% (9% in 2019) said most work came from school contracts. A further 15% (9% in 2019) said they got most work from an app.

6.14 These changes suggest an increase in app usage and, even more so, school contract work, both at the expense of ranks and bookings, whilst the increase in hailing could be from people using apps. The trend in apps is a national one, irrespective of the pandemic whilst the increase in school contract work arose partly from the pandemic and need to find other work at that time (as well as that source increasing need due to social distancing).

6.15 Five put ranks as their most important source of work but did not specify where. One hackney carriage that said they serviced ranks in Haverhill and Bury St Edmunds said their main work however was from an app with ranks second and hailing third.

6.16 Of those putting ranks as their main source of booking, and also naming ranks, hailing ranged from second to fourth, with one putting schools second. Twelve of those naming ranks put ranks as their second most important form of booking. Eleven put ranks third behind either telephone bookings or app usage.

6.17 Four put school runs top with ranks second and hailing third or fourth. Five respondents told us their main work was school runs with their next most important source of work bookings. Another said they only undertook school runs (a WAV vehicle), and the final one put schools top with app bookings second.

6.18 Four were clearly private hire and bookings only.

6.19 Amidst this vast array of operating formats, what is clear is that the trade is making use of every opportunity to make a living. There is no clear-cut hackney carriage only cohort.

6.20 All responded to the question if they felt there were too few, about the right number, or too many hackney carriages in West Suffolk at this point in time. 57% felt there were too many. 30% felt numbers were about right, and an equal 6% each said either too few or made no response.

6.21 70% felt current fares were about right. 13% felt they were too low and 11% said too high. 6% did not comment.

6.22 61% felt disabled passengers were adequately supported. 25% said they did not know. 7% said the question did not apply to them whilst 8% felt disabled passengers were not adequately supported.

6.23 Many made comments about wheelchair accessible vehicles and service to all with disabilities. Three confirmed they felt there were no issues, and that people were well-served. Seven said they serviced people with extra needs of mobility or disability – many if they had saloon vehicles, with many people choosing to sit in the vehicle and put their wheelchair in the boot. Five felt there were sufficient WAV vehicles.

6.24 Two pointed out there had been a reduction in WAV since the policy change.

6.25 One said they did get phone bookings asking for WAV vehicles but that they were not able to help them. Another said more 'vans' were needed.

6.26 A comment was made that two companies did have WAV vehicles.

6.27 Another said all those needing adapted vehicles booked, with many having their own transport in any event.

6.28 One person with a WAV said they had only undertaken one WAV journey per year over the last four years. Another said two jobs in two years.

6.29 It was suggested by one respondent there was no demand for WAV in Bury St Edmunds, and another said the same for Newmarket.

6.30 Another person took the opportunity to complain that there were too many vehicles and drivers for the work available and asked for reduced numbers of licences and driver training. Another said that those with WAV needed better and more training.

6.31 All these views provide a very mixed view – with a balance of positive and negative that provides comfort yet also gives concern.

Operator views

6.32 The operator questionnaire did not get a large response. There were three responses, one from a single vehicle operator, another from a franchise of a national operation with three vehicles, two of which are WAV and the third from a company with about eighty vehicles but only 65 drivers.

6.33 One commented how hard it was to add drivers. However, their main issue related to their business model being drivers that took a lot of time with their customers. Their aim is to treat customers as if part of their family, focusing on meeting principally the needs of those needing more assistance. A recent week saw half their income from those needing to travel in their wheelchair. Their service covered more than just West Suffolk. Their vehicles are rear loaders but using a ramp not a tail-lift.

6.34 The single owner driver covered just Bury St Edmunds. They took web and phone bookings but felt the business was hard to make money in with so many vehicles. If a person seeks to make a journey with special needs, they do their best to either help or find someone else in another company that can help to ensure the person is not let down.

6.35 The large operator serviced all West Suffolk and had tried an app without success but was now considering returning to use of one. Their main present concern was needing to move to replacing vehicles earlier than they would normally. They were aiming to increase accessible vehicles but always tried to tailor the vehicle provided as best as they could to stated customer need.

6.36 Current policy restrictions meant they were not increasing their fleet as much as they wished, with two rear-loading vehicles being added instead of five smaller hybrid vehicles. This related to much of their wheelchair business seeing customers best serviced by use of rear loaders with electric ramps. They focus on linking customers with regular drivers and ensuring sufficient time is given for any journey made.

6.37 They still preferred and invested preferably in hybrid vehicles at this point due to needing confidence in range and performance. They felt about 5% of their work was passengers needing to travel in their chairs.

6.38 They suggested that current policies would lead to well-maintained low mileage vehicles having to be taken out of service prematurely.

6.39 These three responses are encouraging yet again provide some concerns but also pointers towards future policy. The issue of the relative high cost and longer life of more specialist WAV style vehicles is not a new one, nor a local issue.

7 Evaluation of unmet demand and its significance

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

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

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

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

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

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

7.7 The first component which can be zero is the proportion of daytime hours where people are observed to have to wait for a hackney carriage to arrive. The level of wait used is ANY average wait at all within any hour. The industry definition of these hours varies, the main index user counts from 10am to 6pm (that is eight hours ending at 5.59pm). The present index is clear that unmet demand cannot be significant if there are no such hours. The only caveat on this component is that the sample of hours collected must include a fair element of such hours, and that if the value is non-zero, review of the potential effect of a wider sample needs to be considered.

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

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

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

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

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

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

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

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

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

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

	2024	**2019**			**2005**	**2003**	**1997**
ISUD component	**All West Suffolk**	**Newmarket and Mildenhall**	**Bury St Edmunds and Haverhill**	**All West Suffolk**	**Bury St Edmunds and Haverhill**	**Newmarket and Mildenhall**	**Newmarket and Mildenhall**
Average passenger delay	0.13	0.07	0.37	0.2	0.75	0.19	0.23
Overall delay over a minute	1.03	6.25	6.25	6.25	30.79	4.86	8
Off-peak delay	3.27	2.53	8.67	5.2	7.32	0	1
Seasonal Factor	1	1	1	1	1	1	1
Peakiness index	0.5	0.5	1	0.5	0.5	0.5	0.5
Latent demand	1.15	1.09	1.11	1.10	Not in use	Not in use	Not in use
ISUD value	0.51	0.60	22.25	3.58	84	Zero	0.92

7.18 For 2024, the overall ISUD value is the lowest from all values observed either for the area or any part of it in previous years. However, average passenger delay has increased (albeit only from four to eight seconds), off peak delay has increased and latent demand has also increased, some signs of worsening of service. It is principally the strong reduction of the level of overall delay over a minute that has reduced the overall statistic

7.19 The increase in off peak delay is usually a symptom of lower flows meaning more vehicles are working from telephone circuits during daytime hours when flows tend to be lower. The reduced overall delay level results from the reduced nighttime demands. Hence although the overall conclusion is that the total service level has marginally improved, the change in three key parameters is counter to this and of concern. This is even more so given the fact that demand overall has reduced, so there should have been a bigger improvement across all parameters. This is discussed further in the synthesis chapter where it is used with other elements to provide a conclusion.

7.20 Considering historical reviews, the 2005 survey covered Bury and Haverhill 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.

7.21 The surveys in 2003 and 1997 in Newmarket and Mildenhall 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 Newmarket and Mildenhall had removed its limit before 1997 when the DfT survey clearly states, 'no limit'.

7.22 In 2019, using all available data, Bury St Edmunds and Haverhill had the highest index of significance of unmet demand. However, even that value was 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.

7.23 It should also be noted that much of the delay components for Bury St Edmunds and Haverhill arose from waiting occurring at the Bury St Edmunds railway 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.

7.24 It is interesting to note that, in a further test, taking out the railway station observations, there was more overall delay arising for passengers in Bury and Haverhill than in Newmarket and Mildenhall, despite those two locations 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 and conclusions drawn in full context.

8 Summary, synthesis and study conclusions

8.1 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

8.2 West Suffolk Council was created on 1 April 2019 merging the former Forest Heath District and St Edmundsbury Borough Councils. The new authority 'West Suffolk Council Hackney Carriage and Private Hire Licensing Policy' was approved in late 2022. This survey has been undertaken following guidance in the latest Department for Transport Best Practice Guidance (BPG) issued in November 2023. The aim is to collect a database of information to identify how the present service by licensed vehicles currently meets public need. This latest survey was undertaken as a collaboration between the authority and Licensed Vehicle Surveys and Assessment (LVSA) to maximise information gathered.

8.3 The aim is to provide the local licensing authority and its councillors sufficient information to guide further policy and service development in line with current legislation, thinking and guidance. The Report is fully in line with latest BPG recommendation of use of unmet demand methodology to support this policy and service development based on a solid foundation of information.

8.4 The timeline for this Report saw rank observations in June 2024 and consultations with the public, key stakeholders and trade stakeholders from July through to October 2024. The council brief to LVSA was to understand if there is any significant unmet demand for the services of hackney carriages in the area and also if the current hackney carriage (and private hire) services provided are accessible and able to be used by those with disabilities.

8.5 The BPG also encourages review alongside the Local Transport Plan, although the latest 'Suffolk Local Transport Plan 2025-2040' was published in October 2024 just after completion of collection of data for this survey. That document is also linked to the 'Transport East' Transport Strategy 2023-2050 covering the wider area of Norfolk, Essex, Suffolk, Southend-on-Sea and Thurrock. Five of the latter strategy strategic areas are within West Suffolk – Bury St Edmunds, Haverhill, Newmarket, Mildenhall and Brandon.

8.6 The local licensed vehicle fleet was impacted by the pandemic. Hackney carriage vehicle numbers were more resilient although both vehicle types are now increasing in number again, although at the time of the survey were still less than the level pre-pandemic. Hackney carriages at the time of the survey were 42% of the total licensed vehicle fleet, an increase from the 33% share they had at the time of peak vehicle numbers.

8.7 Driver numbers have followed a similar pattern although the authority only offers licences that allow a driver to drive both hackney carriage and private hire vehicles. Operator numbers also declined through the pandemic and are only slowly increasing.

8.8 The level of hackney carriage wheelchair accessible vehicles (WAV) is currently 12%, much lower than the peak of 29% or the level of 24% before the policy changes were implemented. However, prior to that private hire levels of WAV had risen and were 30% at the time of the survey. Overall provision within the total fleet sees 23% WAV, putting West Suffolk 40th out of the 267 licensing authorities in terms of levels of provision – a very good level in the national context. However, the disparity between hackney carriage and private hire is high, with hackney carriages 104th out of the 199 authorities with WAV hackney carriages (excluding those with 100% WAV fleets and those with no hcv WAV), but phv levels 10th out of the 267 authorities.

Rank observations

8.9 The rank observations, over a typical weekend in June, found the level of hours with no hackney carriage activity increased from 58% in 2019 to 67% now. However, taking all ranks together there were just 11% of the 75 survey hours with no activity anywhere, only marginally increased from the 8% of 2019. The two ranks at Fred Archer Way, Newmarket, and Haverhill High Street both saw hackney carriage vehicles but no arriving passengers.

8.10 Overall activities at ranks (vehicle and passenger arrivals and departures) were some 22% less now than in 2019 although the main rank near WHSmith in Newmarket saw reduced share of the total whilst Cornhill, Bury St Edmunds and the White Hart rank, Newmarket both saw increased share of the total.

8.11 The level of hackney carriage activity was also reduced, from 90% of total activity in 2019 to 85% now. The level of private cars using ranks increased from 6% to 10% (typical after the pandemic). Worst in this respect was the St Andrews Street rank in Bury St Edmunds.

8.12 Total estimated weekly passenger flows for the 2024 snapshot in June are some 36% down on the 2019 estimated levels across the area. The Cornhill Rank, Bury St Edmunds now has 43% of the total passengers in the area (was 35%) with the WHSmith rank in Newmarket now second place with 34% (was 44%), seeing the highest level of reduced passenger flows across the area.

8.13 The White Hart rank, Newmarket sees 10% (and actually saw some periods that were busier than 2019), Bury St Edmunds railway station 7%, Mildenhall 4%, Brook Service Road Haverhill 1.5% and St Andrews Street Bury St Edmunds 1.5%. An informal rank was noted at the corner of Risbygate and St Andrews Street North in the early hours of Saturday and Sunday, but passenger flows were not visible given this operation was not identified in any advance review.

8.14 In terms of hires per hackney carriage across West Suffolk, levels are now just 14 per vehicle per week compared to 26 in 2019, although had the number of hackney carriage vehicle numbers not increased, the level would be 17. This is very low levels of demand.

8.15 Profiles of demand in 2024 are like those in 2019 but reduced in level. Daily average flows are reduced most on Fridays (60% of 2019) and least on Saturdays (70% of 2019), but with the ratio of peak flow to average now higher (4.33 2019 and 4.5 now). Hence, although general levels of demand are reduced, the difference between typical and peak is increased, which makes meeting demand harder.

8.16 In 2019 there were seven hours that had over 100 passengers; in 2024 there were just three, all overnight Saturday to Sunday now. The 3am hour on Sunday morning sees highest reduction, mainly in Newmarket, related to loss of a night venue there.

8.17 As might be expected with reduced overall passenger demand, hours seeing passenger delay reduced from 45 in 2019 to 23 in 2024. 44% of total delay was within the Saturday hours and 22% in the early hours of Saturday morning. Just 3% occurred on Thursday and 31% Friday. 55% of all delay was at Cornhill rank, Bury St Edmunds and just 20% at Newmarket WHSmith.

8.18 Half the available hackney carriages were observed in our sample plate observations compared to 63-70% in 2019. The share of those serving just one area has increased marginally, but the proportion servicing Bury St Edmunds Cornhill has increased whilst that at Newmarket has strongly reduced. There are a lot less vehicles now covering more than one location. This is the opposite of what was expected from the removal of the two zones and seems more related to the changes in patronage of ranks. However, taking the actual number of departures 38% of movements were in Newmarket and 33% at Cornhill, Bury St Edmunds, suggesting vehicles returning more quickly to the Newmarket rank.

8.19 Detailed review of the proportion of plates active by period suggested the focus of service on Thursdays was daytime with that on Saturday focussed on the night trade.

8.20 Few private hires were observed near ranks, but with a clear lower level in Newmarket compared to Bury St Edmunds, demonstrating the high level of company-based vehicles in Newmarket that are part of the hackney carriage trade.

8.21 These patterns appear to show the removal of the zones has not significantly modified vehicle allocations across the area.

8.22 The reduced overall number of WAV vehicles in the fleet is further reduced when considering those seen active at ranks, with 7% of the vehicles observed at ranks being WAV style compared to 12% in the hackney carriage fleet. In 2019 the share in the fleet (25%) and the share at ranks (26%) were similar.

8.23 However, the number of people seen using a wheelchair in the survey remained the same in 2019 and 2024 at two, although the only location common to both was Newmarket High Street. In 2019 the other was at Mildenhall, whilst in 2024 this was at Cornhill, Bury St Edmunds.

8.24 The numbers seen being assisted rose slightly from 31 in 2019 to 38 now with this spread over the whole area with Bury St Edmunds highest, followed by Haverhill, Newmarket and Mildenhall. Just one person was observed being assisted at Bury St Edmunds railway station.

Public views

8.25 Public views in 2024 were obtained using council contacts on-line, compared to the on-street interview methodology of 2019. 225 responses were received compared to the 408 in 2019. The general profile of responses by age and gender was well-aligned to the population. The top five urban areas all provided more response than their share of population, with the largest proportion being from Bury St Edmunds (47% compared to 23% of the population). 86% classified themselves as British. Half of responses were from Facebook.

8.26 Use of licensed vehicles in the last three months was higher (72%) than in 2019, partly given this being normal for on-line surveys where most are motivated to complete by having an interest in the subject. 44% used private hire, 33% both types, 19% hackney carriage and 3% said they used neither.

8.27 Average usage estimated was 2.3 trips per person per month, up from 1.5 in 2019. The highest share, similar to 2019, was 24% saying they used them no more than once or twice a month (22% 2019). A reduced 22% (33% in 2019) said they got licensed vehicles from a rank. Usage of apps had increased from 5% to 14%, mainly reducing rank and hail usage.

8.28 In terms of companies contacted just four in 2024, three in 2019, received between 26% and 8% of all mentions. The three from 2019 were the same top three in 2024 with two increasing their share. There were less companies mentioned now than in 2019, and a national app company reduced its share from 6% in 2019 to a single mention this time. Two new entrants had gained good levels of share, but there appeared to be a changeable overall scene between 2019 and 2024.

8.29 Frustration was recorded about trying to get vehicles by phone including one stating “I have given up phoning” and another “please tell me companies I can phone”.

8.30 Local apps appeared more trusted than national ones.

8.31 The most quoted rank was Cornhill, Bury St Edmunds with 50% in 2024 (up from 35% 2019) whilst Newmarket WHSmith rank saw about the same share (36% compared to 34%). Next was Bury St Edmunds railway station but with just 8%, Mildenhall 6% and no mention this time of Haverhill.

8.32 Although stated views about various aspects of their recent trip remained focussed on ‘very good’ there were more ‘very poor’ rankings in 2024. Daytime just 2% did not feel safe, rising to 15% at night. However, there was concern that there were six female respondents who responded that they did not feel safe during recent journeys. Of more concern is that these incidents have not been reported to the licensing section or anyone else.

8.32 While 51% would consider use of an electric vehicle, significantly higher than in 2019, there were other concerns about safety and other reaction against their use.

8.33 Of the 42% responding, 26% said they did not need to wait at ranks with 34% saying up to five minutes.

8.34 A reduced 40% (70% 2019) felt those in the area with disabilities got a good service from hackney carriage vehicles and drivers, with the remaining 60% saying they felt people did not.

8.35 Latent demand at the value of 1.15 was higher than the 1.056 of 2019. The highest levels were at Bury St Edmunds Cornhill and Newmarket High Street (ranks not specified). 45% of those giving up at ranks walked. One of the options used seemed to be an illegal operation in Mildenhall taking advantage of gaps in service provided. Overall experience of use of licensed vehicles saw most, 31% say satisfactory, 28% bad and 24% good.

8.36 In terms of passengers with long-standing disabilities, 30% said they had a long-standing illness, disability or infirmity. 36% of mentions were walking sticks or crutches, 16% a chaperone or carer, 15% a wheelchair at all times and 7% a wheelchair some or most of the time. Further detail suggested 12% were wheelchair users needing a WAV, 5% were wheelchair users but did not need a WAV but 18% would find it hard or impossible to get into larger WAV style vehicles. 3% would need help to transfer and store their wheelchair.

8.37 A further range of responses was provided about other matters people would need including text messages informing them their vehicle had arrived (19%), on-time vehicle arrival (17%), 9% needing assistance to or from vehicles and several others.

8.38 Overall, the level of complexity of disability need was high with a wide and varied range of needs across the area.

8.39 A set of eight statements relating to refusals, extra charges, or feeling uncomfortable obtained 52 total mentions from people. 21% - 11 people felt they were made uncomfortable due to their disability. Refusals or being ignored were also frequently mentioned. Some responses suggested illegal actions by drivers, such as refusals to take assistance dogs. Of greater concern is any reporting of this to licensing.

8.40 With reference to how people felt improvements could be made, 20% said disability awareness training for drivers and 18% the same for operators. 17% took the hard line that any proven discrimination should see revocation of a driver licence.

8.41 Three opportunities were given to provide more information of a more specific nature – if people said an aspect was good or very good (50 responses), or poor or very poor (76 responses), or just a general opportunity for other comment (96 responses). A wide range were provided, ranging from praise to criticism, with many of concern. Again, a major concern is that many illegal actions have not been reported to licensing, but also that people had not provided positive feedback before this opportunity either. There were at least three clear refusals for disabled customers noted amongst these responses.

8.42 In summary, there were nine clear statements of appreciation which could be quoted as encouragements to the trade and a further 19 more general positive statements.

8.43 Negative comments as usual across the country saw expense the most frequent issue, but there were also three serious claims (albeit only from one person each) regarding refusals related to disability issues.

8.44 Some issues could be easily resolved by publicity, e.g. locations of ranks, listing of those providing disability focussed services but more so by ensuring a way of providing feedback could be provided and encouraged.

Stakeholder views

8.45 36 key stakeholder responses were received including from:

- 13 pub, club or bar
- seven supermarkets
- five hotels
- entertainment sites
- restaurants
- one village hall
- one hotel and pub
- Bury St Edmunds railway station
- NHS patient services

8.46 53% were from Bury St Edmunds, 19% Newmarket, 11% Mildenhall, 8% Brandon but none from Haverhill.

8.47 30% saw people ask staff to make a booking, 28% said people went to ranks, 23% used their own mobile phones, 9% the location phone, 5% a dedicated free phone, 3% an app or website and 2% hailed. Only a few companies were named.

8.48 Overall comments suggested most stakeholders saw most issues with pre-booked or booked trips. A major concern was several who said they had to make other provision for lack of licensed vehicle services.

8.49 The station was concerned about vehicles driving around waiting to get bookings whilst those with permits for the rank not providing sufficient service which could provide an opportunity to engage with the rail operator that rarely occurs.

8.50 There were only a few negative comments in terms of provision for those with disabilities, one relating to an on-site issue with parking on their private land preventing disability access for licensed vehicles.

8.51 Again, none of the stakeholders had advised the licensing section or others about their concerns.

Trade views

8.52 A slightly higher number of trade responses (63 compared to 54 in 2019) were obtained. Of the 86% telling us types of vehicles operated, 20% had a WAV, 15% a hybrid vehicle and 4% an EV.

8.53 Vehicle ownership levels were slightly lower than in 2019, but still very high at 82%. Reasons for choosing particular times to work focused on 'personal preference' (22% compared to 19% 2019), 22% regular bookings, 21% (was 23%) family with 7% avoiding disruptive customers, same as in 2019. Although only a small share, 1%, said their operating times were impacted by sharing a vehicle, this was significant as no-one had said this in 2019, suggesting more drivers were now sharing vehicles.

8.54 The top area served was Newmarket (37%, but reduced from the 49% of 2019), then Bury St Edmunds (29%) (same as 2019). Mildenhall and Haverhill proportions were similar to 2019 (8% and 11% now compared to 9% for both in 2019). 5% said they serviced both Bury St Edmunds and Newmarket. Another said 80% of their work was in Newmarket with 10% in Mildenhall and 10% in Bury St Edmunds.

8.55 For 2024, school contract work, app work and hailing had all seen increased levels compared to 2019 – 18%, 15% and 5% compared to 9%, 9% and 2% in 2019. Both rank and telephone had reduced from 33% to 29%. This was confirmed by 11 ranking school contract work as their highest source of work, one hackney carriage WAV saying they did no other work.

8.56 The dominant response remained that 57% of the trade responding felt there were too many, with just 6% saying too few. Just 13% felt fares were too low with 11% thinking them too high and 30% saying they were about right.

8.57 8% suggested disabled passengers were not adequately supported but 61% felt they were. Seven took time to explain how they helped those needing extra assistance. Many others quoted demand for WAV was generally very low in the area.

8.58 A specific operator survey obtained just three responses. One was from a company focussing on serving customer need, including for those with disabilities. Their service covered more than just the West Suffolk area. A large operator expressed concern that even the modified vehicle policies were restraining them adding more vehicles.

Overall performance indicators

8.59 Use of the 'index of significance of unmet demand' (ISUD) and its components to review service performance found the current index the lowest the value has ever been – apart from a zero value in 2003 in Newmarket and Mildenhall. The value is 0.51 with the cut-off for level of significance being 80, suggesting very low values of unmet demand for the service of hackney carriages in the area.

8.60 However, some components saw worsened values. This is against the reduction in overall passenger numbers that normally would imply all parameters improving. However, the off-peak performance value has marginally worsened, often a symptom of daytime hackney carriages also undertaking booked work to the expense of rank performance. This often also results from low passenger numbers at ranks in daytime hours.

8.61 Average passenger delay across the area has increased (marginally – 0.07 minutes to 0.13 minutes, or four to eight seconds), as has latent demand (1.09 to 1.15). These are, however, marginal, but still pointers that improvement can be made.

Synthesis

8.62 This latest review based on rank work in June 2024 and consultation with a wide range of public, general and trade in the Autumn of 2024. It benefitted from a collaborative approach between the consultant and council in terms of some data gathering.

8.63 In terms of policy changes, there is no evidence of benefit or disbenefit in any significant way with respect to the merging of the two former separate hackney carriage zones. There is clear evidence the WAV policy change has reduced the level of WAV, although there does not appear to be any observable reduction in levels of service provided at the ranks in this respect.

8.64 Considering national statistics published by DfT for the end of March 2024, West Suffolk levels of total WAV in the overall licensed vehicle fleet (hackney carriage and private hire) sees the authority 40th out of the current 267 reporting licensing authorities at that time – a good level of provision. However, there is a disparity between hcv and phv provision whereby the English provision level for phv sees West Suffolk 10th out of the 267 authorities, hackney carriage provision puts it just 104th out of the 199 authorities that have WAV fleets (excluding fully WAV and no hcv WAV authorities).

8.65 Overall estimated weekly passenger demand is 36% lower in 2024 than in 2019, although the overall profile of demand is relatively similar between the two years, just with less demand now. Largest decreases were in Newmarket, with clear loss of night life in both Newmarket and Bury St Edmunds, although there was some slight increase seen at the White Hart rank on Saturday evenings. It should be noted one informal rank was seen although its level of use could not be estimated (it only operated late Friday to Saturday and more so late Saturday to Sunday).

8.66 There appear to be sufficient vehicles to meet rank needs, although there are reports of detailed gaps in service, and also in respect to meeting specific needs of those with disabilities. One company was found that had a key focus on serving customers with mobility and other specialist needs although this company also covered other licensing areas.

8.67 There is some evidence that more focus occurs on drivers having a better work-life balance, and therefore tending to work weekdays rather than weekend night, and for this survey a similar sample saw just half the fleet active rather than up to 70% in 2019.

8.68 Overall estimated hires for the total hackney carriage fleet are very low – just 14 per vehicle per week compared to 26 in 2019. This means there will be very few vehicles that can make sufficient living just servicing ranks. There is evidence of increased school contracts with stated dependence on both rank and booking work reduced. An increased number obtained work from apps, although the focus was on local rather than national or international ones.

8.69 A very good response came from the public, although being online it did focus more on users and those with issues. The only gap was no response from Haverhill. There were nine specific statements of appreciation of the service provided and 19 other generally positive statements made. However, there were three very serious issues mentioned with reference to refusals, both at ranks and to phone bookings, and 11 people recorded they felt to be made uncomfortable due to their disability. There were some specific issues relating to females feeling unsafe.

8.70 A major concern is that none of the serious issues mentioned have been reported to any agency, particularly not to the licensing team.

8.71 Key stakeholders also gave significant response, with positive comments but again issues where they had to protect their businesses by making other provision for lacks in licensed vehicle service. Bury St Edmunds railway station voiced a very specific concern which should open the opportunity for the council to work with them moving forward.

8.72 Public statements regarding their mobility needs provided a good number of responses. The main need stated was provision for use of mobility aids. 15% said they always used wheelchairs with 12% saying they had to use a WAV; a further 7% used wheelchairs some or most of the time. 18% however stated they found getting into WAV style vehicles difficult. The overall picture of specialist demand arising from disability is very complex, particularly for what is a relatively small set of respondents.

8.73 An increased proportion of people were aware of the Cornhill, Bury St Edmunds rank compared to 2019, with about the same aware of the Newmarket High Street ranks and those in Mildenhall.

Conclusions

8.74 Although the current situation for licensed vehicles – both hackney carriage and private hire – in West Suffolk is clearly a difficult one, there are many points for encouragement. Many public respondents provided specific examples of compliments of good service. Despite reduced levels of hackney carriage WAV, general provision at ranks appears to remain at a level that the service is usable albeit by only a small number.

8.74 In terms of hackney carriage demand rank usage has continued to decline and focus on preferred times of working. Against this, the number of vehicles has increased, although this further reduces the estimated level of usage based on ranks alone. Like in many places, drivers through the pandemic had to find other sources of work, particularly school contracts, and this has continued.

8.75 At least one apparent new source of rank-based demand has arisen, in Bury St Edmunds over the early hours of both weekend nights, although the level of this is probably relatively small.

8.76 There is clear need to encourage continued feedback from the public and key stakeholders, and the trade, to the licensing section, particularly in regard to matters that should demand attention (for example refusals and people feeling unsafe).

8.77 With reference to the two specific questions posed in the study brief: There is no evidence of any unmet demand for the services of hackney carriages that is overall significant. On the contrary, the level of observed hackney carriage demand at ranks could clearly be serviced by a much smaller fleet were vehicles only providing rank and hail.

8.78 There is no legitimate requirement that hackney carriages only service ranks and it is also clear they undertake a wide range of bookings, contracts, app service meeting a wide range of need across the full area. We do not consider it would be appropriate at this time to set either a limit at the current level of hackney carriage vehicles, nor one lower given that market forces should prevail.

8.79 In respect of if existing hackney carriage vehicles are accessible to all who wish to use them, this does appear to be the case. Further wheelchair users can and do use the services of the existing fleet both at ranks and by contacting vehicles by phone. However, given the high level of private hire WAV style vehicles this broadens demand and should be encouraged.

8.80 The removal of the two zones does not appear to have had any either positive or negative clear impacts, and although the policy regarding hcv WAV has reduced their number, overall provision of WAV within the total fleet compared to the English situation is good. Most ranks see sufficient of the right kind of vehicle although detailed issues have been reported.

8.81 This data and consultation exercise has proved very useful and informative and worthwhile. Collaborative working between the consultant and the council has added significant value to the information gathered. It has also provided high levels of ownership of the results and conclusions by the licensing team and those that support them.

9 Recommendations

9.1 A method is needed to encourage continued feedback from the pubic and key stakeholders, and a way by which all parties involved can work together to see continual improvement in the overall licensed vehicle service offered in West Suffolk. This could be, as some authorities are doing, using a QR code in both hackney carriage and private hire vehicles and at key points such as on public transport posters, or more involved options such as establishing a taxi quality partnership involving all parties could be considered.

9.2 Re-introduction and a method of regularly updating the s165 wheelchair accessible list is critical and urgent.

9.3 Urgent discussions are needed with the operator of Bury St Edmunds station to open a practical working together to improve service at that point and remediate negative issues such as circulating vehicles and lack of vehicles at times. Use of train arrival information to inform drivers should be encouraged and possibly other soft measures such as guards asking passengers needing hackney carriages to alert them on departure from previous stations, however it is admitted this is not in the gift of the local authority but something that could be tabled during discussions. Discussion is needed if the present disused council rank should be abandoned or made more available. This could be an option if the rail company expects too relatively high remuneration for use of the private rank.

9.4 The informal rank in Bury St Edmunds needs more detailed investigation and consideration if it should be formally adopted or other provision made. This could also include determination if the current St Andrews Street rank needs either strong enforcement, better marking or removal.

9.5 Some method of facilitating passengers arriving at ranks where no vehicles are present contacting hackney carriages needs to be considered.

9.6 Although the level of serious complaints raised by this consultation is unprecedented with reference to formal complaints, it does provide some encouragement that introduction of CCTV particularly to hackney carriages, but perhaps to all WAV style vehicles that see regular public service, could be a safeguard for both the public and trade.

9.7 The compliments within this report, and the positive comments provided, should be advertised to the trade, and perhaps also included on the local authority web site demonstrating and praising good service when provided.

9.8 An attempt to obtain both public and key stakeholder inputs from Haverhill is essential. The use of on-street interviews as well as personal visits to key venues may also be a way forward.

9.9 A package of personal discussions with local private hire companies, especially any operating hackney carriages, undertaken on a rolling basis, might be worthwhile considering.

9.10 Regular refreshing of the plate observations at or near ranks by local officers would enhance their knowledge of how current demand is met and continues to develop.