

LICENSING COMMITTEE AGENDA

Thursday, 25th January 2024 at 7.15pm

Council Chamber, Braintree District Council,
Causeway House, Bocking End, Braintree, CM7 9HB

THIS MEETING IS OPEN TO THE PUBLIC

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Members of the Licensing Committee are requested to attend this meeting to transact the business set out in the Agenda.

Councillor J Ayten	Councillor R Ramage
Councillor J Baugh (Chairman)	Councillor P Schwier
Councillor M Green	Councillor M Staines
Councillor P Heath	Councillor W Taylor
Councillor I Parker	Councillor R van Dulken
Councillor J Pell	Councillor L Walters
Councillor G Prime (Vice-Chairman)	Councillor B Wright

Substitutes: Councillor J Beavis, Councillor J Coleridge, Councillor C Dervish, Councillor C Finch, Councillor J Martin, Councillor S Mason, Councillor A Munday, Councillor M Thorogood and Councillor E Williams.

Apologies: Members unable to attend the meeting are requested to forward their apologies for absence to the Governance and Members Team on 01376 552525 or email governance@braintree.gov.uk by 3pm on the day of the meeting.

Any Member who is unable to attend a meeting is able to appoint a Substitute. Written notice must be given to the Governance and Members Team no later than 24 hours before the start of the meeting.

INFORMATION FOR MEMBERS - DECLARATIONS OF MEMBERS' INTERESTS

Declarations of Disclosable Pecuniary Interests (DPI), Other Pecuniary Interests (OPI), or Non- Pecuniary Interests (NPI)

Any Member with a DPI, OPI or NPI must declare the nature of their interest in accordance with the Code of Conduct. Members must not participate in any discussion of the matter in which they have declared a DPI or OPI or participate in any vote, or further vote, taken on the matter at the meeting. In addition, the Member must withdraw from the Chamber where the meeting considering the business is being held unless the Member has received a dispensation from the Monitoring Officer.

Public Question Time - Registration and Speaking

The Agenda allows for a period of up to 30 minutes for Public Question Time. Members of the public may ask questions or make statement to the Committee on matters listed on the agenda for this meeting.

All questions or statements should be concise and should be able to be heard within the 3 minutes allotted to each speaker.

Anyone wishing to ask a question or make a statement is requested to register their interest by completing the Public Question Time registration [online form](#) by **midday on the second working day** before the day of the meeting.

For example, if the Committee meeting is on a Tuesday, the registration deadline is midday on Friday, (where there is a Bank Holiday Monday you will need to register by midday on the previous Thursday). The Council reserves the right to decline any requests to register to speak if they are received after this time.

When registering for Public Question Time please indicate whether you wish to attend the meeting 'in person', or to participate remotely. People who choose to join the meeting remotely will be provided with the relevant link and joining instructions for the meeting.

Please note that completion of the on-line form does not guarantee you a place to speak during Public Question Time. You will receive email notification from the Governance Service confirming whether your request is successful.

The Chairman of the Committee has discretion to extend the time allocated to registered speakers and to amend the order in which they may speak.

In the event that a registered speaker is unable to connect to the meeting, or if there are any technical issues, their question/statement may be read by a Council Officer.

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Substitute Members

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Comments and Suggestions

We welcome comments to make our services as efficient and effective as possible. If you have any suggestions regarding the meeting you have attended you may send these to governance@braintree.gov.uk

PUBLIC SESSION		Page
1	Apologies for Absence	
2	Declarations of Interest	
	To declare the existence and nature of any Disclosable Pecuniary Interest, Other Pecuniary Interest, or Non-Pecuniary Interest relating to items on the agenda having regard to the Code of Conduct for Members and having taken appropriate advice where necessary before the meeting.	
3	Minutes of the Previous Meeting	
	To approve as a correct record the Minutes of the meeting of the Licensing Committee held on 14th September 2023 (copy previously circulated).	
4	Public Question Time	
	Only Registered Speakers will be invited by the Chairman to speak during public question time. Please see the agenda notes for guidance.	
5	Hackney Carriage Proprietor Licences Allocation	5 - 8
6	Quantity Restrictions - Taxi Licences	9 - 149
7	Licensing Committee Update	150 - 156
8	Urgent Business - Public Session	
	To consider any matter which, in the opinion of the Chairman, should be considered in public by reason of special circumstances (to be specified) as a matter of urgency.	
9	Exclusion of the Public and Press	
	To agree the exclusion of the public and press for the consideration of any items for the reasons set out in Part 1 of Schedule 12(A) of the Local Government Act 1972.	
	<i>At the time of compiling this agenda there were none.</i>	

PRIVATE SESSION		Page
10	Urgent Business - Private Session	
	To consider any matter which, in the opinion of the Chairman, should be considered in private by reason of special circumstances (to be specified) as a matter of urgency.	

Agenda Item: 5

Report Title: Allocation of Two Hackney Carriage Proprietor Licences	
Report to: Licensing Committee	
Date: 25 th January 2024	For: Decision
Key Decision: No	Decision Planner Ref No: N/A
Report Presented by: John Meddings, Principal Licensing Officer	
Enquiries to: John Meddings (Principal Licensing Officer) EM: john.meddings@braintree.gov.uk Tel: 01376 557790	

1. Purpose of the Report

- 1.1 This report sets out how the ballot will be conducted to allocate two Hackney Carriage Proprietors' Licences currently held by the Council. The Council currently limits the number of Hackney Carriage Proprietors' Licences it issues to 84. Hackney Carriage Proprietors' Licences returned to the Council are required to be allocated in accordance with the Council's Allocation of Hackney Carriage Proprietors' Licences Policy.

2. Recommendations

- 2.1 To issue two Hackney Carriage Proprietors' Licences in accordance with the result of the ballot and the Council's Hackney Carriage Proprietors' Licences Allocation Policy.

3. Summary of Issues

- 3.1 Braintree District Council (the Council) is the Licensing Authority for Hackney Carriage Proprietors' Licences.
- 3.2 The Council limits the number of Hackney Carriage Proprietors' Licences it issues to 84 Licences, which are allocated in accordance with the Council's Policy for the allocation of Hackney Carriage Proprietors' Licences (adopted February 2014).
- 3.3 Two Hackney Carriage Proprietors' Licences have been returned to the Council and therefore need to be allocated.
- 3.4 In accordance with the Council's Policy, expressions of interest were invited over a four-week period ending on 19th November 2023. All licensed drivers and Private Hire Operators were notified of the availability of the Hackney Carriage Proprietors' Licences and an advert was placed on the Council's website inviting expressions of interest from individuals currently not engaged in the "taxi" trade.
- 3.5 During the expressions of interest period, the Council received 45 responses. Two of the "expressions of interest" received were submitted in error and have been removed from the draw. 43 "expressions of interest" have been entered

into the ballot and are listed below. The numbers attached to each individual will be the identifiers used in the ballot.

- | | |
|-----------------------------|-----------------------------|
| 1. Alick Nkhata | 23. Maciej Giba |
| 2. Tracy Prior | 24. Matin Shah |
| 3. Ali Salih | 25. Mohammad Ullah |
| 4. Amara Collins-Oke | 26. Mauran Kunbalasingam |
| 5. Andrew Keen | 27. Mohsin Rafiq |
| 6. Cetin Ustabas | 28. Moulay Ouadia Garnaoui |
| 7. Chidiebere C. Oke | 29. Muhammad Ishaq Khan |
| 8. Darren Smith | 30. Muhammad Shah Nawaz |
| 9. David Gentry | 31. Ramazan Gorgulu |
| 10. Dawood Ahmadi | 32. Ramcoumar Ramadassou |
| 11. Aman Thukral | 33. Rashid Rehman |
| 12. Juber Hussain | 34. Ravi Ramalingham |
| 13. Nabeel Khan | 35. Richard Douglas Haywood |
| 14. Osman Arslan | 36. Sanan Kumar Bista |
| 15. Santhkumar Wengadasalam | 37. Savas Ucar |
| 16. Hassan Rafiq | 38. Sharaf Mohamed Ali |
| 17. Ilker Akbiyik | 39. Syed Shah |
| 18. Jody Ann Louise Smith | 40. Tarek Laouad |
| 19. Kamran Sabir | 41. Yasir Mehmood |
| 20. Khalid Mehmood | 42. Alan Edwards |
| 21. Laiq Rahimi | 43. Ahmadi Dawood |
| 22. Lee David Brown | |

- 3.6 The individuals who have been entered into the ballot are invited to attend the draw, so they are able to follow the ballot 'live'.
- 3.7 The ballot will use a web-based number generator, [Calculator.net](https://www.calculator.net) to draw the required lots. This is an independent system and has no affiliation with Braintree District Council and is a publicly accessible website. The operation of the number generator and the drawing of lots will be controlled by a member of the Governance and Members Team. This screen will be projected so that all present can watch the draw.
- 3.8 The number range entered will be 1 to 43 to correspond with the expressions of interest received, as detailed in paragraph 3.5. The website will then generate random numbers in the range on request.
- 3.9 A lot will be drawn for each of the two Hackney Carriage Proprietors' Licences available together with a reserve.
- 3.10 The first number generated will be the winner (Prospective Licence Holder) of the first Hackney Carriage Proprietor's Licence, who will be given the opportunity to complete an application within the next 28 days.
- 3.11 The second number generated will be the "Reserve" for the available Hackney Carriage Proprietors' Licence. If the first lot drawn fails to complete an

application within the required time frame, the second lot drawn will be given the opportunity to complete an application in the required timeframe.

- 3.12 If any number generated is a duplicate of a previously generated number it will be considered void, and a new number generated.

4. Successful Individuals (Prospective Licence Holder)

- 4.1 In accordance with the Council's Policy the successful individual (prospective Licence Holder) will need to licence a Wheelchair Accessible Vehicle (WAV) within 28 days of the ballot in accordance with the Council's Policy.
- 4.2 The successful applicant will be required to undertake a declaration that the Licence will not be sold, or transferred for a period of five years.
- 4.3 Should the successful applicant already be an existing Hackney Carriage Proprietor, they will also be required to undertake a declaration not to sell or transfer any existing Licence.
- 4.4 In the event that the successful Individual does not complete the application process for the Hackney Carriage Proprietor's Licence, the "Reserve" applicant will be invited to complete the application for the Licence.

5. Financial Implications

- 5.1 The successful applicant will be required to pay the required Licence Fee for the Hackney Carriage Proprietor's Licence as part of the application process.

6. Legal Implications

- 6.1 The Town Police Clauses Act 1847 and the Local Government (Miscellaneous Provisions) Act 1976 place on Braintree District Council, as the Licensing Authority, the duty to carry out its licensing functions in respect of Hackney Carriages and Private Hire Vehicles.
- 6.2 Should the Council refuse to grant the Hackney Carriage Proprietor's Licence application once submitted by the successful individual, there is a right of appeal to the Crown Court. The right of appeal lies under the Public Health Act 1875.

7. Equality and Diversity Implications

- 7.1 Section 149 of the Equality Act 2010 creates the public sector equality duty which requires that when the Council makes decisions it must have regard to the need to:
- (a) Eliminate unlawful discrimination, harassment and victimisation and other behaviour prohibited by the Act
 - (b) Advance equality of opportunity between people who share a protected characteristic and those who do not

(c) Foster good relations between people who share a protected characteristic and those who do not including tackling prejudice and promoting understanding.

7.2 The protected characteristics are age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, gender and sexual orientation. The Act states that 'marriage and civil partnership' is not a relevant protected characteristic for (b) or (c) although it is relevant for (a).

7.3 The Equality Impact Assessment indicates that the proposals in this report will not have a disproportionately adverse impact on any people with a particular characteristic.

8. Background Papers

8.1 Hackney Carriage Proprietors' Licences Allocation Policy

8.2 Expressions of interest received during the 4 week invitation period

8.3 Equality Impact Assessment of 9th January 2024

Agenda Item: 6

Report Title: Quantity Restrictions – Taxi Licences	
Report to: Licensing Committee	
Date: 25 th January 2024	For: Decision
Key Decision: No	Decision Planner Ref No: N/A
Report Presented by: Daniel Mellini – Environmental Health Manager (Food, Health & Safety and Licensing)	
Enquiries to: Daniel Mellini – Environmental Health Manager (Food, Health & Safety and Licensing) Email: daniel.mellini@braintree.gov.uk	

1. Purpose of the Report

- 1.1 Braintree District Council (the Council) currently places a quantity restriction (QR) on the number of Hackney Carriage Proprietors (Taxi) Licences it issues in accordance with provisions of Section 16 of the Transport Act 1985. The Council has discretion to restrict the number of Taxi licences it grants subject to it being satisfied that there is no significant unmet demand for Taxi services in the District.
- 1.2 In March 2023 the Licensing Committee (the Committee) was provided with a comprehensive review of the data and guidance regards quantity restrictions. The report concluded by recommending the QR be removed. The Committee agreed to maintain the quantity restriction on the number of Taxi licences issued by the Council to 84, but requested that an independent survey be commissioned to assess whether there was a significant unmet demand for Taxis in the District.
- 1.3 This report sets out the results and recommendations of the independent survey which was commissioned by the Council. The survey is attached as Appendix 1 to this report.

2. Recommendations

- 2.1 It is recommended that the Quantity Restriction is maintained, with the number of Hackney Carriage Proprietor (Taxi) Licences issued by the Council being increased by eight to 92.
- 2.2 Should the Committee agree to the recommendation above, it is further recommended that the Committee agree an exemption to the Council's Hackney Carriage Allocation Policy 2014, that four of the increased Taxi Licences (four out of the eight above) will be made available to non-wheelchair Accessible Electric Vehicles. If the Licences are not allocated in the next available ballot for Taxi Licences, any unallocated licences will be allocated in accordance with the Policy.

3. Summary of Issues

- 3.1 The Council is the Licensing Authority under the Town Police Clauses Act 1847 and the Local Government (Miscellaneous Provisions) Act 1976 for Hackney Carriage Proprietors' licences (hereafter referred to as Taxis, or Taxi licences).
- 3.2 The Council currently places a quantity restriction (QR) on the number of Taxi licences it issues to 84. The Council has currently issued 82 out of the 84 available licences. The remaining two licences are due to be issued by ballot on 25th January 2024.
- 3.3 The Council has placed a QR on the number of Taxi licences for at least two decades. In 1996, the Licensing Committee (the Committee) agreed that an independent survey should be commissioned at regular intervals (every 3 years) to ascertain whether there were sufficient Taxis within the District. The last unmet demand survey was completed in 2016 and evidenced that there was no significant unmet demand for Taxis in the District.
- 3.4 A survey was scheduled for 2020, however this was not carried out due to the Covid-19 pandemic. The Department for Transport (DFT) recommended to Licensing Authorities to delay their unmet demand reviews beyond the three-year interval as it was considered that any review during the pandemic would not be sufficiently typical to be of value.
- 3.5 In March 2023, the Committee was provided with a comprehensive review of the data and the guidance regarding QR. The report concluded by recommending that the QR be removed. The Committee agreed to maintain the QR on the number of Taxi licences issued by the Council to 84, but requested that an independent survey be commissioned to assess whether there was a significant unmet demand for Taxis in the District.
- 3.6 An independent Survey (Appendix 1) was subsequently commissioned which consisted of rank observations, public and trade surveys and key stakeholder consultation.
- 3.7 The recommendations set out in this report will help the Council to deliver the following Corporate Objectives:
- A sustainable environment and a great place to live, work and play;
 - A prosperous district that attracts business growth and provides high quality employment opportunities;

4. Survey Results

- 4.1 Rank observations were conducted at six ranks within the District for a two-week period from 07:00hrs on Sunday 18th June 2023 through to 07:00hrs on Sunday 2nd July 2023.

- 4.2 The tables below set out the statistics of the rank observations carried out. Table 1 sets out the aggregate rank statistics for the first week and Table 2 sets out the aggregate rank statistics for the second week.

Table 1 Aggregate rank statistics – week 1 (18th to 24th June 2023)

Rank location	Total Taxis departing the ranks empty	Total Taxis departing the ranks with passengers	Total Taxis departing the ranks	Total number of passengers departing the ranks
Total for all locations	479	1927	2406	2642
Trinty Street, Halstead	0	1	1	2
Braintree Village rank, Bus stops	1	1	2	4
Station Approach, Braintree	45	59	104	86
Rayne Road, Braintree	4	3	7	5
Manor Street, Braintree	271	961	1232	1330
Albert Road, Witham, (Station)	158	902	1060	1215

Table 2 Aggregate rank statistics – week 2 (25th June to 2nd July 2023)

Rank location	Total Taxis departing the ranks empty	Total Taxis departing the ranks with passengers	Total Taxis departing the ranks	Total number of passengers departing the ranks
Total for all locations	418	1803	2221	2505
Trinty Street, Halstead	5	1	6	4
Braintree Village rank, Bus stops	1	1	2	2
Station Approach, Braintree	52	55	107	72
Rayne Road, Braintree	5	0	5	0
Manor Street, Braintree	254	923	1177	1304

Albert Road, Witham, (Station)	101	823	924	1123
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- 4.3 The results shown in the tables combined show that during the two-week period of rank observations:
- 3,730 Taxis were hired from the ranks
 - 897 Taxis departed from a rank empty
- 4.4 When comparing the results of this survey to results of the survey conducted in 2016, the number of hires observed in 2023 was generally lower than in 2016.
- 4.5 The survey highlights that the number of rank hires was 75% lower in 2023 when compared to 2016 at the Station Approach, Braintree rank. Over the same period rank hires were 24% lower at the Manor Street rank, Braintree and 19% lower at the Albert Road (Witham Train Station) rank.
- 4.6 When comparing rank observations from Manor Street, Braintree, Station Approach, Braintree and Albert Road, Witham the number of hires observed in 2023 was around 27% lower than the number of hires observed in 2016.
- 4.7 Rank observations included an assessment of passenger waiting times. The rank observations highlighted that 1156 passengers out of a total of 5147 passengers (22%) had to wait for a taxi. The survey highlighted small levels of passenger waiting at the Station Approach rank in Braintree. Significant levels of passenger waiting were recorded at the Albert Road (Witham train station) rank predominately at night times. Passenger waiting was also observed at the Manor Street, Braintree rank during both daytime and nighttime hours.
- 4.8 The survey highlighted that most passengers who had to wait for a taxi did so for less than 15 minutes. The survey also evidenced that:
- 1) 179 passengers had to wait more than 15 minutes
 - 2) 30 people waited more than 30 minutes
 - 3) The longest waiting time observed was 63 minutes at Manor Street rank, Braintree.
- 4.9 The longest waiting time of 63 minutes commenced at 00:59hrs on Friday 23rd June 2023. It is important to provide context to this observed waiting period which took place at a time and location where it wouldn't have necessarily been expected to readily obtain a taxi. There is currently no requirement for taxis to ply for hire at a rank in the expectation that a passenger may want to initiate a hire at any time of the day. Should this wait have been recorded at

a time when it would have been expected for the public to easily be able to obtain a hire from this rank, this would have been more concerning.

4.10 Observations highlighted that some intending passengers waiting at ranks gave up and walked away which can be a measure of latent unmet demand. The number of waiting passengers who gave up waiting was 130 which represents 19% of all waiting passengers and 2.5% of all passengers recorded.

4.11 The observations highlighted the proportion of taxis operating from the observed ranks was around 16% of the total licensed by the Council. It is important to note this is not necessarily the proportion of all taxis working at any one time and it is possible that some taxis were engaged in pre-booked hires during the recording period.

5. **Public Survey**

5.1 A public consultation was carried out as part of the Unmet Demand Survey. An online survey received 211 responses. Section 4 of the Unmet Demand Survey report presents the results of the public engagement in more detail.

5.2 It is acknowledged within the survey that when analysing the results obtained from the public survey data, there is a need to consider factors which may influence the results of the survey. Online surveys are often used by people who have particular issues to raise with respect to the subject under consultation. Whereas people with no strong views or who have not experienced any problems or particular benefits, are less likely to participate. Consequently, issues identified may be overrepresented.

5.3 A summary of key responses received highlighted that:

- 51% of respondents felt that there were not enough Taxis.
- 15% felt that there were about the right number,
- 9% felt there were too many Taxis
- 25% didn't have an opinion or didn't know.

5.4 Respondents were asked to rate aspects of their last trip 1 to 5, with 1 being poor and 5 being very good. Set out in Table 3 below are the average ratings. The results indicate the level of general satisfaction with the standards of Taxis and their drivers, although the results indicate there is room for improvement. A detailed set of responses highlighting areas of improvements are highlighted within the survey report.

Table 3 – Aspect average ratings (Vehicle standards)

Aspect	Average rating
Cleanliness of interior	3.95
Cleanliness of exterior	3.92
General condition	3.93
Driver helpfulness	3.86
Driver appearance	3.75

- 5.5 A summary of responses received during the survey is set out in pages 43 to 45 of the survey report.
- 5.6 The survey asked the public whether they had experienced any problems with local Taxi services. Table 4 below sets out the response to those questions and a summary of the representations made in response are set out on pages 46 and 47 of the survey report.

Table 4 – Identified problems by percentage with taxi Services in the Braintree District

Identified problems with taxi services	Percentage %
Design of Vehicle	2
Driver Issues	9
Position of ranks	9
Delay in getting a taxi/lack of availability	38
Cost	2
Poor Driving/speeding	2
Cleanliness	10
No problems experienced	42

6. Key Stakeholder and Trade Surveys

- 6.1 The survey also included contact with key stakeholders. A list of the key stakeholders is set out on page 54 of the Unmet Demand Survey report. The results are shown in section 5 of the Unmet Demand Survey report.
- 6.2 Braintree District licence holders were invited to complete an online survey. 44 responses were received out of 879 (5%) sent. The consultation responses received are shown in section 6 of the Unmet Demand Survey report.
- 6.3 The Taxi trade was asked how many journeys on average per week were picked up from the ranks and by hailing, together with how many hires they picked up from pre-booked hires.
- 6.4 The survey indicated that rank hires accounted for around 38% of all Taxi hires. 46% of Taxi respondents indicated that less than 50% of hires are

currently derived from ranks. 15% of Taxi respondents indicated that none of the hires that they fulfil are derived from ranks.

- 6.5 Respondents were asked whether there are sufficient Taxis in the Braintree District to meet current levels of demand. Although a small sample size and according to what respondents normally drive, there is a strong indication that Taxi drivers feel there are sufficient Taxis in the Braintree District. The table below sets out the consultation responses.

Table 5 – Trade response (adequate levels of Taxis in the Braintree District)

	Yes, I normally drive a Taxi	Yes, I drive both Taxi & Private Hire vehicles	Yes, I normally drive a Private Hire vehicle
Yes	92%	60%	22%
No	8%	40%	78%

- 6.6 Respondents were then asked how many Taxis there should be in the fleet in the Braintree District. There was significant support from those who responded who drive a Taxi for there to be no change to the number of Taxi licences issued by the Council, with 44% of those who drive Private Hire vehicles supporting no change. 9% of respondents who drive Taxis considered that there should be an increase in the number of Taxi licences issued compared with 44% of those respondents who drive Private Hire vehicles.

Table 6 – Trade consultation (levels of Taxis in the Braintree District)

	Yes, I normally drive a Taxi	Yes, I drive both types of vehicles	Yes, I normally drive a Private Hire vehicle
60-70	18%	0%	11%
No change	73%	75%	44%
100-120	9%	25%	44%

- 6.7 In response to the statement “removing the limit on the number of Taxis in Braintree District would benefit the public by reducing waiting times at ranks” 36% of Taxi drivers strongly disagreed with the statement with 60% of those respondents who drive a Taxi/Private Hire vehicle also disagreeing. The table below sets out the responses.

	Yes, I normally drive a Taxi	Yes, I drive both types of vehicles	Yes, I normally drive a Private Hire vehicles
Strongly disagree	36%	0%	12%
Disagree	18%	60%	6%
Neither agree or disagree	18%	20%	53%
Agree	18%	20%	24%
Strongly Agree	9%	0%	6%

7. **Unmet Demand**

7.1 The Unmet Demand Survey report provides in section 9 a detailed evaluation of unmet demand and explains its significance in the context of the Taxi trade within the Braintree District.

7.2 It is important to define what constitutes unmet demand. This is defined within section 9 of the Unmet Demand report (page 86) as:

“when a person turns up at a hackney carriage (Taxi) rank and finds there is no vehicle there available for immediate hire. This normally leads to a queue of people building up, some of who may walk off (taken to be latent demand), whilst others will wait till a vehicle collects them. Later passengers may well arrive when there are vehicles there, but because of the queue will not obtain a vehicle immediately”.

7.3 The industry standard incidence of significant unmet demand (ISUD) index for taxis was initiated as a numeric and consistent way of evaluating unmet demand and its significance. The ISUD methodology was initially developed to enable Authorities to retain their limit on taxi 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 An ISUD value of less than 80 will indicate that there is generally no unmet demand which is significant. The Unmet Demand survey determined an ISUD value at 5766.9 which provides a strong indication that unmet demand is above a level which would be considered significant. The ISUD value reported in 2016 at the last survey was 27.2 which is significantly lower than the value recorded in 2023.

7.5 The conclusion of the Unmet Demand Survey report based upon the evidence gathered is that there is an unmet demand, and the level of unmet demand was significant in the Braintree District.

7.6 To comply with section 16 of the Transport Act 1985, the Council is required to consider whether it should maintain the QR in place and to introduce measures which will reduce the levels of unmet demand to a value which is below the levels which are deemed significant.

8. **Allocation of Taxi Licences – Wheelchair Accessible Vehicles and Electric Vehicle Exemption**

8.1 In 2021, 47% of the District’s carbon emissions were transport related. Public transport in general needs to be accessible, reliable, safe and affordable to

encourage greater use. The Council supports Government plans to phase out petrol and diesel powered vehicles, converting to electric for most vehicles and biogas or hydrogen for some larger vehicles like buses, lorries, tractors and other plant. The Council declared a climate emergency in 2019 to build on and step up the work that the Council has already undertaken to reduce greenhouse gasses and adapt to a changing climate.

- 8.2 The Council is in the process of reviewing Taxi and Private Hire Vehicle Policy which will include a review of how Policy can feed into the Council's wider Climate Change Strategy. Setting future emission standards for the Taxi and Private Hire vehicle fleet will feed into the Council's priorities to "encourage greener transport choices" and to meet the relevant aspects of the Council's Climate Change action plan.
- 8.3 All Taxi licences not already allocated are issued in accordance with the Council's Hackney Carriage Allocation Policy 2014 and they are awarded by way of ballot. In accordance with this policy, the winners of the ballot are required to apply to the Council within a reasonable time frame and the vehicle licensed will be of a type that must be wheelchair accessible (WAV). The Council's policy does not exclude electric wheelchair accessible vehicles. The Council currently does have any licensed WAV electric vehicles.
- 8.4 Should the Committee decide to increase the number of Taxi licences by eight (10%) as recommended by the Unmet Demand Survey, it is proposed to issue four of the eight Taxi licences in accordance with current policy, increasing the current wheelchair accessible fleet from 20 to 24 (26% of the total). The proposed increase in the number of wheelchair accessible vehicles will continue to help improve the likelihood of a wheelchair accessible vehicle being available for public hire at a rank.
- 8.5 As well as increasing the commitment to increase the number of WAV's, in order to help encourage the Taxi trade to start moving away from petrol and diesel-powered vehicles it is proposed to seek an exemption from the Council's Policy and issue the remaining four taxi licences as electric vehicles, which are not necessarily wheelchair accessible. It is acknowledged there are electric vehicles available on the market which are wheelchair accessible, although options are extremely limited. Anecdotally, the Council is also aware that the costs of these types of electric vehicles are currently prohibitive for the Trade to bring forward for licensing.
- 8.6 The purpose of the exemption will be to establish the level of interest within the Taxi trade in licensing electric vehicles generally.
- 8.7 Applications for electric vehicles will be subject to the same process for expressions of interest and allocation by ballot in accordance with the Council's Policy. Any electric Taxi licence issued in accordance with the exemption will be required to remain electric at subsequent renewal or transfer of a licence or replacement of the vehicle.

- 8.8 Any vehicle licence will be required to comply with all the Council's entry requirements and conditions.
- 8.9 In the event that at the next allocation there are no expressions of interest with respect to electric vehicles, or the allocation of four licences is not met, the remaining licences will be allocated in accordance with the Council's Policy requiring the vehicles to be a WAV.
- 8.10 The exemption to the policy will end once the eight licences have been allocated and any future reissue of Taxi licences will be issued in accordance with existing policy.
- 8.11 Officers will keep the Committee informed of the success of this proposal to increase the number of licensed electric taxis. Any data collected, including licence holder and public feedback may inform future decisions.

9. Options

- 9.1 Section 11 of the Unmet Demand Survey report sets out several options for the Authority to consider with the aim of reducing current levels of unmet demand which is significant.
- 9.2 The options are set out on page 95 of the Unmet Demand Survey report and are also set out below:
- Option 1 – Wait for driver numbers and private hire operations to increase, to meet prebooked hire demand and free hackney carriage capacity to meet demand at the Taxi ranks.
- Option 2 - Increase the number of hackney carriage vehicle licences to enable more hackney carriages to meet demand at Taxi ranks. An increase could be to a new specified limit, or to remove the limit altogether.
- Option 3 - Employ alternative measures to encourage the existing hackney carriage fleet to prioritise rank-based demand over pre-booked hire demand, in order to reduce passenger waiting at the Taxi ranks.
- Option 4 – Develop an approach which provides an immediate increase in the number of hackney carriage licences available, coupled with a scheduled increase in hackney carriage fares. These measures would be in anticipation that, if these licences are taken up and put in operation, the pattern of operation would be similar to current practices, i.e. undertaking a mixture of rank-based hires, pre-booked hires and contract hires.
- 9.3 Pages 95 to 97 of the Unmet Demand Survey report provide detailed analysis of each of the options. The independent report recommends option 4, to increase the number of Taxis by increasing the number of Taxi licences by 10%. This would equate to eight additional Taxi licences increasing the level of Taxis from 84 to 92. The Unmet Demand Survey report acknowledges that it would take time for the measures proposed by option 4 to become effective

which would include the introduction of new vehicles by way of ballot and the review of Taxi fares.

- 9.4 It is suggested that this increase would make a significant difference to the current level of passenger waiting at ranks. Whilst the proposed increase may not fully eliminate all peak passenger waiting, it would bring the current level of unmet demand to a level which is below the current level of significant unmet demand. The proposed increase instead of a complete removal of the QR would help maintain the operational viability of Taxis at other times of the week.
- 9.5 The recommended option is contrary to the proposal made in the Licensing Committee report of 21st March 2023, which was to remove the QR entirely.
- 9.6 The recommended option also includes a review of Taxi fares at the next scheduled opportunity. The survey highlighted that current fares are likely to have not kept up with current levels of inflation since 2016 and should be higher than the current table of fares as a result. An increase in fares alongside the proposed increase in vehicles would help raise interest in joining the Taxi fleet and may accelerate the number of vehicles obtaining hires from ranks, especially during unsocial hours.
- 9.7 The Council has conducted two separate fare reviews in the last two years, with the last being in April 2023. A further fare review should be instigated. However, this is a decision for the Council's Cabinet in accordance with the Executive Function Regulations and cannot be determined by the Licensing Committee.

10. **Financial Implications**

- 10.1 The cost of the Unmet Demand Survey and any other additional work necessary to undertake this process is paid for by the Taxi licensing trade through taxi licensing fees.
- 10.2 Should the Council increase the number of Taxis by eight, the Council will receive a modest increase in income. However, if the QR is removed then the income from licensing fees could increase by an unknown amount. The levels of income generated would help offset the cost of managing the Taxi licensing regime and could potentially reduce the fee to licence an individual Taxi. Any new income received will be ringfenced to the Taxi licensing regime.
- 10.3 Should there be a legal challenge to the decision, there will be financial implications for the Council in defending any proceedings in the Courts, particularly the cost of litigation.

11. **Legal Implications**

- 11.1 In accordance with section 16 of the Transport Act 1985 and the Best Practice Guidance issued by the Department for Transport (DFT), the Council is required to commission a survey at regular intervals to determine whether there is an unmet demand for Taxis in the District.

- 11.2 The Unmet Demand Survey was conducted in accordance with the Best Practice Guidance issued by the Department for Transport (April 2010) relevant at the time the survey was commissioned. The Best Practice Guidance has since been re-issued in November 2023. The only significant change in the Guidance in respect of the Unmet Demand Survey relates to the period between surveys by increasing the recommended period to five years from three years. Should the Council decide to maintain the QR the next survey would need to be carried out within five years to comply with the DFT Best Practice Guidance.
- 11.3 Any decision to maintain, amend, or remove the QR is open to legal challenge via the Courts. There is also the potential for the Council to be subject to a challenge with respect to the proposed exemption to the current policy to allocate four vehicles which are not wheelchair accessible.
- 11.4 The Best Practice Guidance issued by the DFT in April 2010 and in its latest re-issue in November 2023 states that it is best practice not to impose a QR. However, this is only guidance and the Council may disregard the guidance if there is evidence to support a decision to maintain the QR.

12. Other Implications

- 12.1 Should the QR be maintained, the duty to review the Council's position to restrict the number of taxi licences will continue.

13. Equality and Diversity Implications

- 13.1 Section 149 of the Equality Act 2010 creates the public sector equality duty which requires that when the Council makes decisions it must have regard to the need to:
- (a) Eliminate unlawful discrimination, harassment and victimisation and other behaviour prohibited by the Act
 - (b) Advance equality of opportunity between people who share a protected characteristic and those who do not
 - (c) Foster good relations between people who share a protected characteristic and those who do not including tackling prejudice and promoting understanding.
- 13.2 The protected characteristics are age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, gender and sexual orientation. The Act states that 'marriage and civil partnership' is not a relevant protected characteristic for (b) or (c) although it is relevant for (a).
- 13.3 The Equality Impact Assessment indicates that the proposals to increase the number of licences issued by the Council will not have a disproportionately adverse impact on any people with a particular characteristic.

14. **List of Appendices**

14.1. Appendix 1 - LVSA - Braintree District Hackney Carriage Unmet Demand Survey (December 2023).

15. **Background Papers**

15.1 Reports and minutes of the Licensing Committee held on 11th September 2019 - [Item 6](#) – Licensing Committee Quantity Restrictions.

15.2 Reports and minutes of the Licensing Committee held on 21st March 2023 - [Item 6](#) Licensing Committee Quantity Restrictions Taxi Licensing

15.3 Taxi and private hire vehicle licensing [best practice guidance](#) for licensing authorities in England November 2023

15.4 [Equality Impact Assessment](#) – Allocation of Hackney Carriage Proprietors Licence



Braintree District
Hackney Carriage Unmet Demand Survey
December 2023

EXECUTIVE SUMMARY

This Hackney Carriage Unmet Demand Survey has been undertaken on behalf of Braintree District Council following the guidance of the April 2010 DfT Best Practice Guidance document, and all relevant case history in regard to hackney carriage unmet demand.

Whilst there have been several rounds of consultation by the Department for Transport, in recent years, looking at current standards and guidance, no significant revisions have been implemented since the 2010 Best Practice Guidance. Notwithstanding the age of the guidance, the practices adopted within the licensed vehicle trades since 2010 have evolved. Consequently, the approach to undertaking hackney carriage demand surveys have also evolved, to incorporate measures over and above the requirements of the Best Practice Guidance.

Over recent years, passengers have increasingly made greater use of mobile phones and smart technology to hire licensed vehicles, including both private hire vehicles and hackney carriages.

Operators of hackney carriages and private hire vehicles have increasingly made use of mobile phones and internet linked technology to obtain hires. Notwithstanding increasing levels of use of mobile and internet technology, the skill of hackney carriage drivers to identify the best opportunities for obtaining direct public hires, remains a key and valuable skill. In practice, in Braintree, this skill relates to identifying the optimum taxi ranks to visit and the optimum times to visit along with providing high levels of service in order to encourage passengers to make repeat use of the services provided by specific individual drivers. Flagging down of passing hackney carriages is relatively rare throughout Braintree District. Lack of flagging down as a method of booking is a common feature outside major cities in the UK.

This Executive Summary draws together key points from the main report.

Video cameras were used to record footage over a two week period from 7:00 on Sunday 18th June 2023 through to 7:00 on Sunday morning, 2nd July 2023. The video footage was processed to derive passenger and hackney carriage volumes at ranks. The data processed from footage included all passengers who had to wait for hackney carriages at ranks. The volume of hires over the two weeks of observation are presented below.

Week 1 rank survey results

Rank location	Total hackney carriages departing the ranks empty	Total hackney carriages departing the ranks with passengers	Total hackney carriages departing the ranks	Total passengers departing the ranks
Total for all locations	479	1927	2406	2642
Trinity Street, Halstead	0	1	1	2
Braintree Village rank, Bus stops	1	1	2	4
Station Approach, Braintree	45	59	104	86
Rayne Road, Braintree	4	3	7	5
Manor Street, Braintree	271	961	1232	1330
Albert Road, Witham (Station)	158	902	1060	1215

Week 2 rank survey results

Rank location	Total hackney carriages departing the ranks empty	Total hackney carriages departing the ranks with passengers	Total hackney carriages departing the ranks	Total passengers departing the ranks
Total for all locations	418	1803	2221	2505
Trinity Street, Halstead	5	1	6	4
Braintree Village rank, Bus stops	1	1	2	2
Station Approach, Braintree	52	55	107	72
Rayne Road, Braintree	5	0	5	0
Manor Street, Braintree	254	923	1177	1304
Albert Road, Witham (Station)	101	823	924	1123

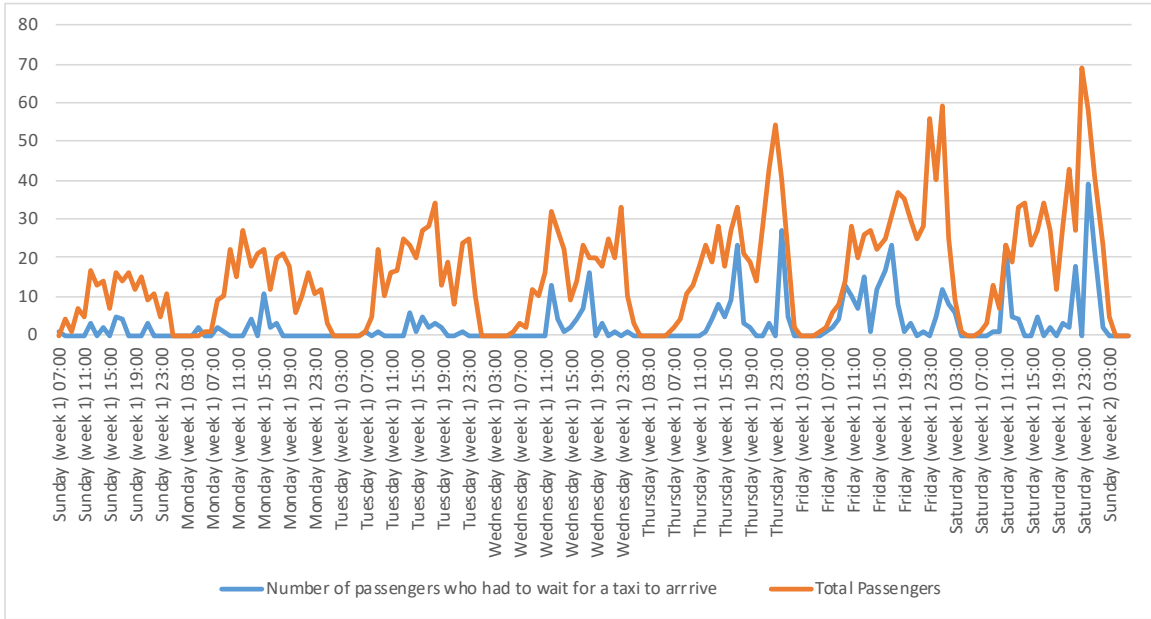
Most hackney carriage hires were obtained through pre-booking or as contract hires. Approximately 38% of hackney carriage hires were obtained at the ranks.

A further feature of the trade in Braintree is that the proportion of hackney carriages working from the ranks appears to be relatively low. The proportion of the fleet either waiting at ranks or having left a rank with a hire, peaked at around 16%. This low proportion corroborates evidence that rank hires form a minor proportion of the hires undertaken by hackney carriages.

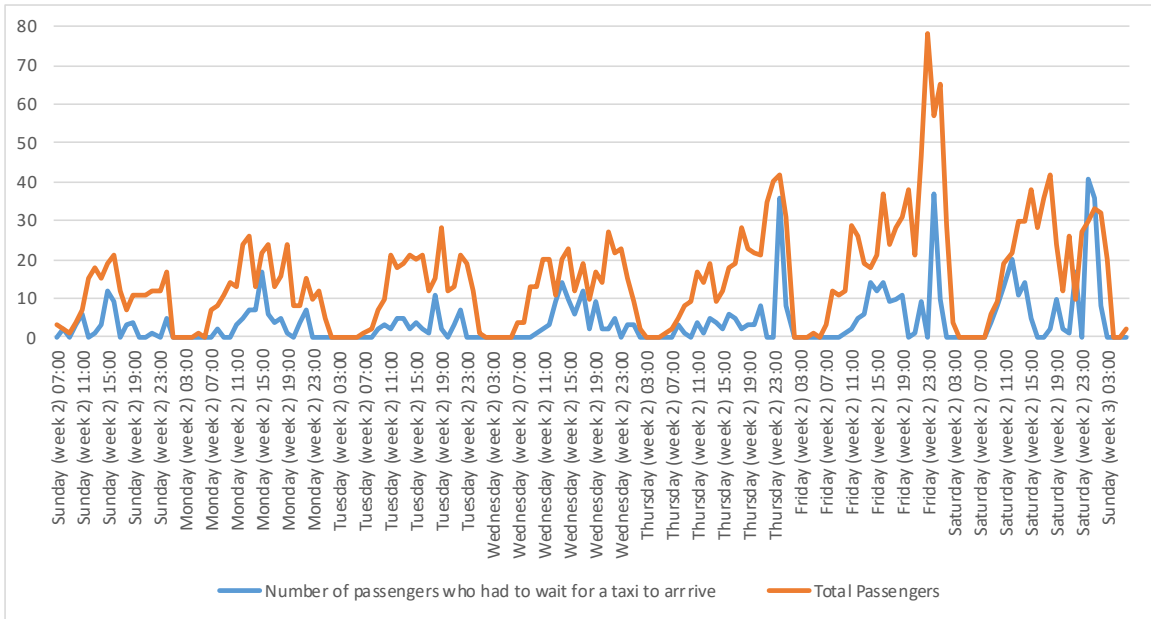
Passenger waiting often occurred at various times each day.

Profiles of the number of waiting passengers compared with all passengers is presented below for each week of the survey.

Profile of total and waiting passengers per hour – Week 1



Profile of total and waiting passengers per hour – Week 2



The total number of waiting passengers was 1,156 passengers (22% of all passengers).

The number of waiting passengers and the duration of waiting is taken into account when assessing whether the level of unmet demand is significant. A calculation was undertaken, using rank activity data and evidence from public consultation, to determine the Index of Significance of Unmet Demand (ISUD). Where the index value is below 80, this is taken as a good indicator that the level of unmet demand is below the

level which is deemed to be significant. The result of the ISUD calculation for Braintree was 5,766.9. Taking this value and other background factors into account, the findings of this study are that there **is unmet demand which is significant**.

The number of hackney carriages licensed by Braintree is significantly higher than that which would be needed to service the rank based demand, if hackney carriages only obtained hires from ranks. Consequently, many of the hackney carriages rely on a combination of both rank based and pre-booked hires, to generate sufficient income.

Nationally, there is a shortage of licensed vehicle drivers currently actively working as either private hire or hackney carriage drivers. This shortage appears to affect licensed vehicle operations in Braintree. The level of provision of licensed vehicles relates both to the number of vehicles licensed and the number of licensed vehicle drivers actively operating these vehicles. The shortage of drivers in Braintree has affected the level of available provision.

As the survey has found that there is unmet demand which is significant, it would be prudent for the Council to consider measures which could be applied to address the shortage of hackney carriage provision at ranks.

We have identified four options to be considered along with a recommendation regarding which option is implemented.

Option 1 – wait for driver numbers and private hire operations to increase, to meet pre-booked hire demand and free hackney carriage capacity to meet demand at the taxi ranks.

Option 2 – increase the number of hackney carriage vehicle licences to enable more hackney carriages to meet demand at taxi ranks. Such an increase could be an increased limit, or removal of the limit altogether.

Option 3 – employ alternative measures to encourage the existing hackney carriage fleet to prioritise rank based demand over pre-booked hire demand, in order to reduce passenger waiting at the taxi ranks.

Option 4 – develop an approach which provides an immediate increase in the number of hackney carriage licences available, coupled with a review of hackney carriage fares at the next appropriate review date. The review of hackney carriage fares would consider what an appropriate level would be. If the fares were increased, this would be likely to attract more drivers to the hackney carriage trade.

It is anticipated that if additional licences were to be made available and if these licences are taken up and put in operation, the pattern of operation would be similar to current practices, i.e. undertaking a mixture of rank based hires, pre-booked hires and contract hires.

In order to justify option 1, a robust projection of future increases in driver numbers and private hire provision would be required to make this policy a defensible plan. No projections have been developed and it is unlikely that any such robust projection will be developed in the near future. It is likely that the private hire supply will grow over time to meet demand and hence displace some hackney carriage operation from pre-booked hires to increase availability at the ranks. However, it is not feasible to estimate the timescale that any such changes would take.

Potential measures to promote Option 3 are limited and would have limited 'enforceability'. Such measures would be limited to discussions to encourage hackney carriage operators to prioritise rank service rather than pre-booked hires, in the face of commercial pressures to do otherwise.

Option 2 would be a robust and defensible approach. However, it should be acknowledged that additional vehicles would require additional drivers to operate them. There are no reliable measures which may be implemented to ensure that licensing of additional hackney carriages will result in additional drivers operating them, in the short term. For example, some existing drivers of private hire vehicles or second (non owner) drivers of existing hackney carriages may apply for and operate an additional hackney carriage. Such changes would not effectively add capacity to the fleet, as the same drivers would merely switch to operating a different vehicles at the same times that they would otherwise be working. It is likely that this measure would be effective over an extended period, however, it is not feasible to forecast how long the measure would take to become effective.

Option 4 is effectively option 2 with an additional measure to encourage more rapid take up and implementation of additional hackney carriage licences. Increased fares income would encourage more interest in joining the hackney carriage fleet and meeting demand during unsocial hours, along with retaining more drivers in the trade.

Option 4 is the recommended option for implementation. It is recommended that an increase to the hackney carriage licence limit of an additional 8 licences is implemented, along with an increase in taxi fares. Measures would take time to become effective. A relatively small increase in provision would make a significant difference to the level of passenger waiting at ranks. Around 10% increase (8 hackney carriages) would be assumed to result in a commensurate increase of 10% in capacity, during both peak and off peak periods. This level of increase would not fully eliminate all peak period passenger waiting, but would bring down unmet demand to a level below that which is significant, whilst maintaining the operational viability of hackney carriages at other times during the week.

A fares review would consider a range of factors. A review would not necessarily result in an increase in fares. If fares were increased, following an increase in the hackney carriage licence quantity limit, this would enhance interest in joining the hackney

carriage fleet. Increased fares would accelerate the increase in availability, more quickly reducing the level of unmet demand and ensuring that operation within the trade is more sustainable. It is anticipated that an increase in fares would not be implemented immediately, but would be considered at the next scheduled fares review date.

It is recommended that a fares review is conducted at the earliest opportunity and that this fares review should consider increasing fares to a level which is deemed appropriate.

A common concern associated with increasing fares is that demand would fall if fares increase. The level of consumer price inflation and income growth since 2016 have both been higher than the increase in hackney carriage fares since 2016. Consequently, having adjusted for inflation, fares are currently more affordable now, than they were in 2016. An increase in fares is likely to have less of an impact on demand than if fares had kept pace with inflation.

The practice of hackney carriages undertaking a mix of pre-booked and rank hires is unlikely to change in the foreseeable future. Public preference has changed in recent years and there is more desire to pre-book licensed vehicles and have them come to collect the passenger from their location, rather than passengers having to walk to taxi ranks. The hackney carriage trade has adapted to meet these changing patterns of demand. The value of the practice of individual owner / drivers providing pre-booked services to repeat clients should not be underestimated. This success of this type of service is a strong indicator of service quality. Drivers need to provide good service to generate repeat business and operating in this way is a strong incentive to provide good levels of service.

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1 GENERAL INTRODUCTION AND BACKGROUND

1.1 Licensing background

Braintree District Council is responsible for the licensing of hackney carriage and private hire vehicles operating within the Council area and is the licensing authority for this complete area. Further details of the local application of Section 16 of the 1985 Transport Act with regard to limiting hackney carriage vehicle numbers is provided in further Chapters of this report.

Hackney carriage vehicle licences are the only part of licensing where such a stipulation occurs and there is no legal means by which either private hire vehicle numbers, private hire or hackney carriage driver numbers, or the number of private hire operators can be limited.

This review of current policy is based on the Best Practice Guidance produced by the Department for Transport in April 2010 (BPG). It seeks to provide information to the licensing authority to meet section 16 of the Transport Act 1985 “that the grant of a hackney carriage vehicle licence may be refused if, but only if, the licensing authority is satisfied that there is no significant demand for the services of hackney carriages within its local area, which is unmet.” This terminology is typically shortened to “no SUD”. Current hackney carriage, private hire and operator licensing is undertaken within the legal frameworks first set by the Town Polices Clause Act 1847 (TPCA), amended and supplemented by various following legislation including the Transport Act 1985, Section 16 in regard to hackney carriage vehicle limits, and by the Local Government Miscellaneous Provisions Act 1976 with reference to private hire vehicles and operations. This latter Act saw application of regulation to the then growing private hire sector which had not been previously part of the TPCA. Many of the aspects of these laws have been tested and refined by other more recent legislation and more importantly through case law.

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

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

The most recent reviews were by the Office of Fair Trading in 2003, through the production of the BPG in 2010, the Law Commission review which published its results in

2014, the Parliamentary Task and Finish Group which reported in September 2018, the Government Response in February 2019 and the consultation on “Protecting Users” which closed on 22 April 2019.

In November 2016, the Department of Transport (DfT) undertook a consultation regarding enacting Sections 167 and 165 of the Equality Act 2010. These allowed for all vehicles capable of carrying a wheel chair to be placed on a list by the local council (Section 167). Any driver using a vehicle on this list then has a duty under Section 165 to:

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

This was enacted from April 2017 but continued issues led to pressure for further change (some of which came in the second of two 2022 Acts). These two new 2022 Acts make small but significant changes.

The 2022 Acts are the “Taxis and Private Hire Vehicles (Safeguarding and Road Safety Act) (31 March 2022)” and the “Taxis and Private Hire Vehicles (Disabled Persons) (28 June 2022)”.

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.

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.

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

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

The Law Commission conclusion (Law Commission, Taxi and Private Hire Services, Law Com No 347, May 2014, ref CM8864) included retention of the power to limit hackney carriage vehicle numbers but utilizing a public interest test determined by the Secretary of State. It also suggested the three-year interval encouraged for review of unmet demand levels also be used for rank reviews and accessibility reviews. However, there is

currently no expected date either for publication of the Government response to the Law Commission, nor indeed any plans for further revisions to legislation. It should be noted that DfT did encourage authorities during the pandemic to delay unmet demand reviews beyond that three-year interval as they did not consider any review in the midst of the pandemic as being sufficiently typical to be of value.

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

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

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

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.

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

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

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

Others allow a wider range of van style conversions in their wheel chair accessible fleet, whilst some go as far as also allowing rear-loading conversions. Given the additional

price of these vehicles, this often implies a restriction on entry to the hackney carriage trade.

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

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

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

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

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

The BPG in 2010 also provided additional suggestions of how these surveys should be undertaken, albeit in general but fairly extensive terms. A key encouragement within the BPG is that "an interval of three years is commonly regarded as the maximum reasonable period between surveys". BPG suggests key points in consideration are

passenger waiting times at ranks, for street hailing and telephone bookings, latent and peaked demand, wide consultation and publication of “all the evidence gathered”.

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

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

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

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

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

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

To summarise, the Department for Transport Best Practice Guidance only references ‘quantity restrictions’ and that not imposing them is regarded by the Department as ‘best practice’.

1.2 Conclusion to Chapter

In conclusion, the present legislation in England and Wales sees public fare-paying passenger carrying vehicles firstly split by passenger capacity. All vehicles able to carry nine or more passengers are dealt with under national public service vehicle licensing.

Local licensing authorities only have jurisdiction over vehicles carrying eight or less passengers. These are split between hackney carriages which are, alone, able to wait at ranks or pick up people in the streets without a booking and private hire, which 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.

In the minds of the travelling public, the view of what a taxi is tends to be much more blurred than the formal definitions. The invention of the mobile phone and then the internet have not helped with definitions although this has been going on a long time but with many significant developments in the period of two or so years prior to the Covid-19 pandemic, with the take-up of apps both for private hire and hackney carriage vehicle services.

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

It is also accepted that it is possible for a customer to call any private hire company from any location they so choose to provide their transport. Many customers would not realise that if there was an issue it would be hard for a local authority to follow this up, unless the triple lock was in place by the vehicle used and was for the area the customer contacted licensing in. Attempts are being made to minimise this issue with growing liaison between licensing authorities.

Further, introduction of recent methods used by customers of obtaining vehicles for journeys, principally using 'apps' on mobile phones have also led to confusion as to how 'apps' usage sits with present legislation. This continues to be debated with the key issue being if obtaining a vehicle using an app (most of which rely on proximity to choose a vehicle) is a pre-booking or not, given the often minimal time between the person making known their need on the app and a vehicle meeting that need.

2 LOCAL BACKGROUND AND CONTEXT

Braintree District has a current population of 155,200 based on mid 2021 population estimates.

All licensing authorities have full powers over licensing the vehicles, drivers and operators serving people within their area. At the time of writing this report, Braintree District has implemented a limit of 84 hackney carriage licences.

2.1 Licensing Statistics from 2013 to date

The provision of hackney carriages and private hire vehicles has varied over recent years. The following table and figures present the historic trends over recent years. The data presented has been obtained from official Department for Transport statistics.

Table 1 - Historic profile of licensed vehicles and licensed drivers

Year	Wheelchair accessible taxis	Other taxis	Total taxis	Wheelchair accessible PHVs	Other PHVs	Total PHVs	Total licensed vehicles	Total driver licences issued	Total accessible vehicles	Ratio of drivers to vehicles
2013	9	75	84	19	232	251	335	379	28	1.13
2015	10	71	81	10	142	152	233	287	20	1.23
2017	12	72	84	5	178	183	267	389	17	1.46
2018	14	70	84	5	165	170	254	399	19	1.57
2019	19	65	84	8	179	187	271	311	27	1.15
2020	20	64	84	6	178	184	268	304	26	1.13
2021	18	63	81	6	104	110	191	291	24	1.52
2022	17	66	83	10	217	227	310	335	27	1.08
2023	18	64	82	41	594	635	717	744	59	1.04

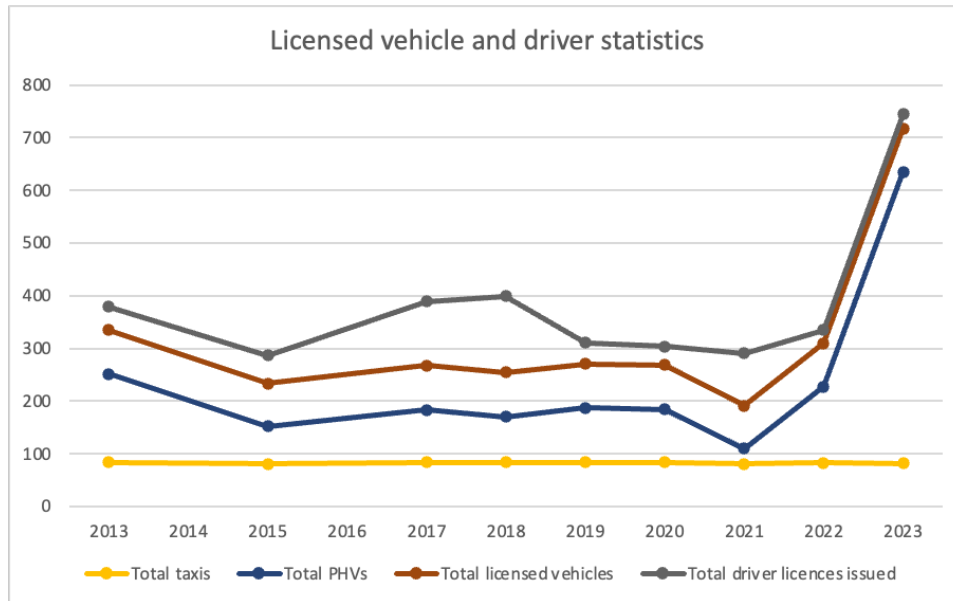


Figure 1 - Historic profile of licensed vehicles and licensed drivers

Since December 2021 a single private hire operator has been licensing significant quantities of private hire vehicles and private hire drivers in Braintree district. This operator specialised in undertaking contract hires, in particular, Home to School contracts. Private hire vehicles and private hire drivers are licensed in order to undertake these contracts. Much of the work undertaken by these private hire drivers and private hire vehicles is undertaken in other licensing areas, not just within Braintree District. As a consequence of this practice, the number of vehicles and drivers licensed in Braintree District has been significantly higher than has traditionally been the case prior to 2021.

The private hire drivers licensed to drive for the operator have a type of private hire licence with an exemption from having to pass the topographical element of the driver knowledge test. As such, these exempted drivers are limited to undertaking contract hires for school contract or limousine type work.

For the purposes of assessing how private hire provision influences demand for hackney carriages, we are primarily interested in private hire vehicles and drivers who undertake public facing private hire work. i.e. working through private hire operators who accept bookings from members of the public for one off journeys (or return bookings).

In the year 2022 – 23, approximately 77% of private hire vehicle licence applications were related to Home to School contracts. The remainder of applications, for public facing private hire vehicle licenses, have been consistent at around 180 – 190 per annum, with the exception of the period affected by Covid – 19. Therefore, it is estimated that the number of private hire vehicles serving the public (as opposed to contract work) in 2023 is similar to 2022.

2.2 Wheelchair accessible licensed vehicles

Department for Transport data includes data regarding the number of wheelchair accessible licensed vehicles. Figure 2 illustrates changes in the number of wheelchair accessible licensed vehicles in Braintree District. In recent years there have been more wheelchair accessible hackney carriages than wheelchair accessible hackney carriages in the licensed vehicle fleets. In many areas, this can be an issue.

Most trips which require the use of a wheelchair accessible licensed vehicle are pre-booked. In areas where few hackney carriages commonly undertake pre-booked hires, obtaining a wheelchair accessible hackney carriage can be challenging. When seeking to pre-book a wheelchair accessible licensed vehicle for a future day can also be challenging when booking through a private hire operator. Some operators cannot guarantee that particular wheelchair accessible licensed vehicles will be working on the day in question or indeed will be in the required locality at the time required.

In Braintree, the situation where hackney carriage drivers accept direct pre-booked hires can work well for wheelchair users, who have direct contact with wheelchair accessible hackney carriage owner/drivers. Such owner drivers are often in a position where they

keep their own diaries and can determine if they are available to accept future bookings for wheelchair users.

The increase in wheelchair accessible licensed vehicles in 2023, illustrated in Figure 2 is primarily associated with the increase in licensing of private hire vehicles licensed by a single operator for undertaking Home to School transport contracts. As such, none of these vehicles are expected to be public facing and as such, would not be available for wheelchair user members of the public.

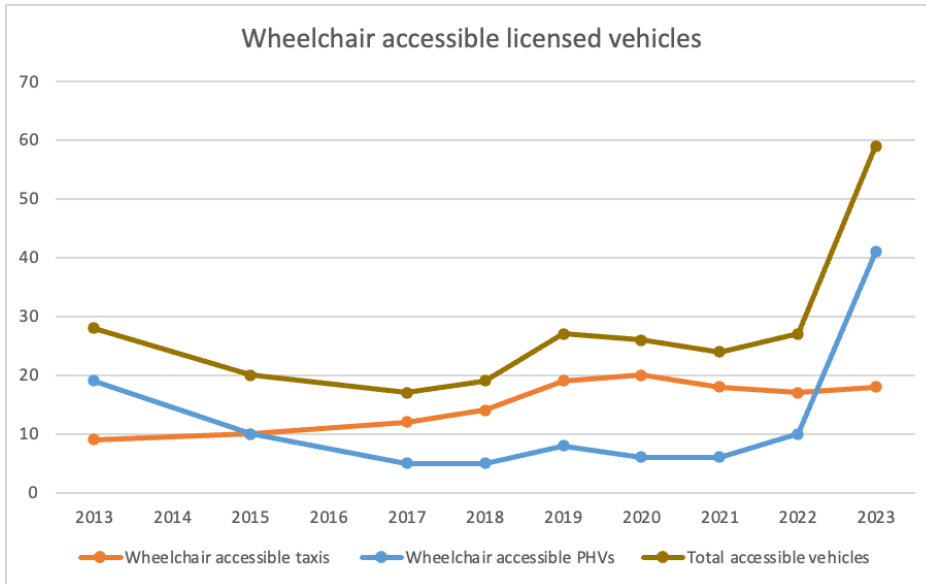


Figure 2 - Historic profile of wheelchair accessible licensed vehicles

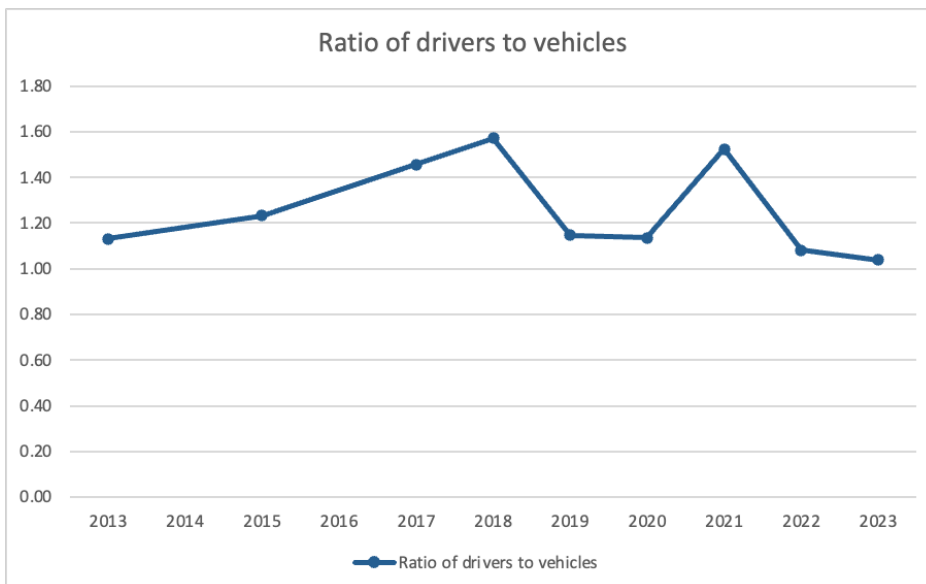


Figure 3 - Ratio of licensed vehicle drivers to licensed vehicles



2.3 Comparative information to other authorities

Table 2 compares recent licensed vehicle numbers for Braintree with other authorities in the DfT East Region. The table is ordered in increasing proportions of total licensed vehicles per 1,000 population. Data was derived from DfT statistics published in 2023, which were the latest statistics available at the time of publication.

It should be noted that the DfT statistics indicate a total of 82 hackney carriages in Braintree. At the time of undertaking the survey 82 hackney carriage plates were in use. However, it is noted that the limit is 84 licences.

2.4 Additional influences on licensed vehicle provision

Amongst some in the licensed vehicle trade, there is a view that in some licensing areas it is particularly easy, cheap or quick to become a licensed vehicle driver and to license a hackney carriage or private hire vehicle. Consequently, some licensing areas have particularly high ratios of licensed vehicles to population.

The higher ratios in some licensing areas relate to a proportion of drivers and vehicles operating in other licensing areas as private hire vehicles. In particular, the City of Wolverhampton has developed a reputation as an authority which will license drivers and vehicles quickly, enabling those licensed vehicles to operate around the country in other authority areas. In addition to vehicles licensed by Wolverhampton, vehicles in other licensing areas are also operated in areas outside the licensing authority area. In such cases, 'out of area' vehicles may be seen operating as private hire vehicles hundreds of miles away from the areas in which they are licensed.

When considering the number of private hire vehicles licensed in an area and comparing with hackney carriage numbers, it is prudent to consider the way in which some private hire vehicles are operated. It is perhaps natural to assume that all private hire vehicles are operating as 'public facing' licensed vehicles which may be hired for short trips on an ad hoc basis, either for immediate hire or for a future time. However, not all private hire vehicles are operated in this manner. Many private hire vehicles are used primarily or solely to undertake contract hires, or chauffeur or corporate hire services. Premium vehicles are often used for such services. Such services are not generally 'public facing'. For example, these private hire vehicles would rarely operate at peak times such as Friday and Saturday nights, carrying passengers to and from licensed premises. The proportion of the private hire fleet in a licensing area, which is not public facing, or which is not operating in the licensing area to service the demand for immediate hires, can vary significantly between areas. Larger cities tend to have larger numbers of private hire vehicles which engage in premium corporate hire or chauffeur type work.

In the East Region, Uttlesford District Council has, in recent years had an exceptionally high ratio of private hire vehicles per 1,000 population. Two key factors are thought to drive this ratio. One is that Stansted Airport is within the area and private hire vehicles servicing demand at the airport may sustain a large number of private hire vehicles. In

addition, Uttlesford District has been used as a licensing base by operators, for licensing vehicles and drivers, for operation in other areas outside Uttlesford District.



Table 2 - Licensed vehicle proportions

Licensing Area	Population, 2021 Census	Hackney Carriages	Private Hire Vehicles	Total licenced vehicles	Hackney Carriages per 1,000 population	Private Hire Vehicles per 1,000 population	Total licenced vehicles per 1,000 population
East Hertfordshire [Limited]	150,100	206	66	272	1.4	0.4	1.8
Southend-on-Sea [Limited]	180,700	269	155	424	1.5	0.9	2.3
Colchester [Limited]	192,700	131	391	522	0.7	2.0	2.7
Cambridge [Limited]	145,700	308	92	400	2.1	0.6	2.7
Stevenage [Limited]	89,500	98	158	256	1.1	1.8	2.9
Bedford [Limited]	185,300	59	565	624	0.3	3.0	3.4
Watford [Limited]	102,300	215	140	355	2.1	1.4	3.5
Luton [Limited]	225,300	165	847	1,012	0.7	3.8	4.5
Braintree [Limited]	155,200	82	635	717	0.5	4.1	4.6
Mid Suffolk [No Limit]	102,700	59	49	108	0.6	0.5	1.1
South Norfolk [No Limit]	141,900	57	115	172	0.4	0.8	1.2
Fenland [No Limit]	102,500	81	45	126	0.8	0.4	1.2
Welwyn Hatfield [No Limit]	119,900	78	77	155	0.7	0.6	1.3
Breckland [No Limit]	141,500	122	71	193	0.9	0.5	1.4
Chelmsford [No Limit]	181,500	165	84	249	0.9	0.5	1.4
Thurrock [No Limit]	176,000	69	182	251	0.4	1.0	1.4
Kings Lynn and West Norfolk [No Limit]	154,300	88	144	232	0.6	0.9	1.5
Tendring [No Limit]	148,100	200	27	227	1.4	0.2	1.5
Maldon [No Limit]	66,200	87	21	108	1.3	0.3	1.6
Central Bedfordshire [No Limit]	294,200	136	353	489	0.5	1.2	1.7
Basildon [No Limit]	187,600	134	192	326	0.7	1.0	1.7
Epping Forest [No Limit]	135,000	202	40	242	1.5	0.3	1.8
Dacorum [No Limit]	155,100	176	118	294	1.1	0.8	1.9
East Suffolk [No Limit]	245,900	63	405	468	0.3	1.6	1.9
North Hertfordshire [No Limit]	133,200	170	92	262	1.3	0.7	2.0
St Albans [No Limit]	148,200	191	103	294	1.3	0.7	2.0
East Cambridgeshire [No Limit]	87,700	98	77	175	1.1	0.9	2.0
Babergh [No Limit]	92,300	96	89	185	1.0	1.0	2.0
Hertsmere [No Limit]	107,800	2	220	222	0.0	2.0	2.1
Three Rivers [No Limit]	93,800	10	211	221	0.1	2.2	2.4
Broxbourne [No Limit]	99,000	175	72	247	1.8	0.7	2.5
Brentwood [No Limit]	77,000	170	26	196	2.2	0.3	2.5
Harlow [No Limit]	93,300	49	197	246	0.5	2.1	2.6
West Suffolk [No Limit]	179,800	221	309	530	1.2	1.7	2.9
North Norfolk [No Limit]	103,000	144	195	339	1.4	1.9	3.3
Rochford [No Limit]	85,600	168	114	282	2.0	1.3	3.3
Broadland [No Limit]	131,700	0	467	467	0.0	3.5	3.5
Great Yarmouth [No Limit]	99,800	191	174	365	1.9	1.7	3.7
Huntingdonshire [No Limit]	180,800	99	586	685	0.5	3.2	3.8
Ipswich [No Limit]	139,700	153	492	645	1.1	3.5	4.6
Norwich [No Limit]	144,000	208	462	670	1.4	3.2	4.7
Peterborough [No Limit]	215,700	108	1,059	1,167	0.5	4.9	5.4
South Cambridgeshire [No Limit]	162,000	3	1,244	1,247	0.0	7.7	7.7
Castle Point [No Limit]	89,600	111	738	849	1.2	8.2	9.5
Uttlesford [No Limit]	91,300	39	1,614	1,653	0.4	17.7	18.1

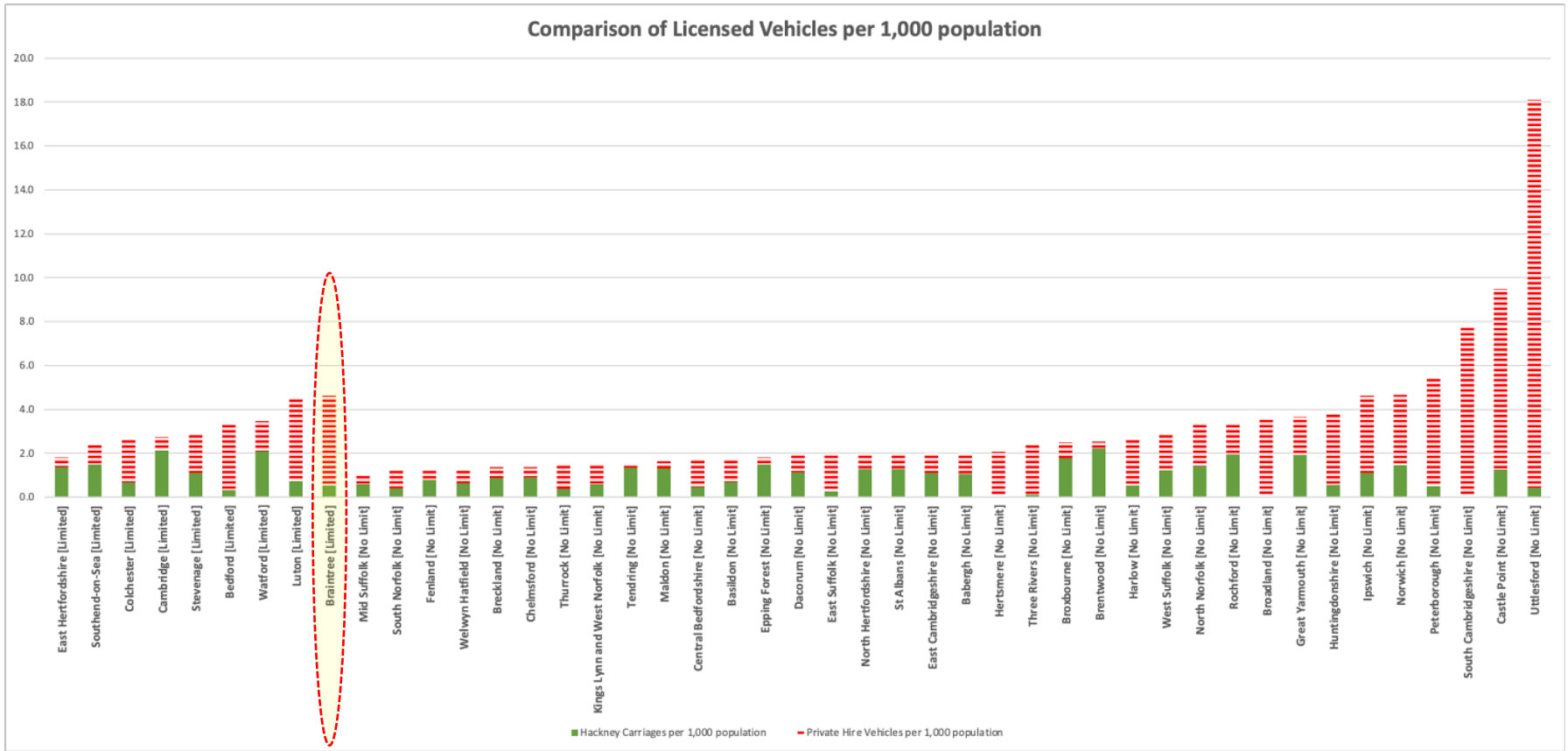


Figure 4 - Comparison of licensed vehicles per 1,000 population

The order in which the data in Table 2 and Figure 4 is presented, is ranked in increasing order of provision of all licensed vehicles. Therefore, the higher the ranking number, the greater the provision per 1,000 population, compared with other authority areas.

2.5 Fares

The current taxi fares tariff is presented on the Braintree District Council website and is reproduced below:

Taxi fares vary based on:

*time of day
day of the week
number of passengers
how much luggage
type of vehicle*

The fares are different if the vehicle:

*is a saloon type vehicle which has four passenger seats or
is a people carrier type vehicle which can seat from five up to a maximum of eight passengers
We do not license taxis to carry more than eight passengers.*

We set a maximum Hackney carriage tariff (taxi fare).

This means the taxi driver:

*cannot charge more than the maximum fare
must display the fare on the meter in the taxi
The taxi driver can negotiate to charge a lower fare.*

The Braintree District Hackney Carriage Association apply to our Licensing Committee for increases in taxi fares. The last increase was in April 2023.

Tariff 1

If the distance does not exceed 643.7metres (704 yards or 0.4 mile) for whole distance £3.90

If the distance exceeds 643.7 metres, for the first 643.7 metres (704 yards or 0.4 mile) £3.90

For each subsequent 86.868 meters (95 yards) or uncompleted part thereof £0.10

Waiting time

For each period of 1 minute or uncompleted part thereof £0.40

Extra charges

(a) MILEAGE TARIFF 2 for hiring's between the hours of 11.00pm and 6am or for any commenced on a Sunday for a public holiday (excluding those stated at (b) below) a charge equivalent of 50% extra (i.e one and a half times) the tariff 1 fare will be charged }

(b) MILEAGE TARIFF 2 (i) for hiring's between 6pm and 11pm on CHRISTMAS EVE (24th December) and NEW YEARS EVE (31ST December)

(c) MILEAGE TARIFF 3 (ii) for hiring's between 11pm on CHRISTMAS EVE & NEW YEARS EVE and 6am on the day succeeding BOXING DAY (27th December) & NEW YEARS DAY (2nd January) – a charge equivalent to 100% extra (i.e double) of the tariff 1 charged.

(e) CARRIAGE OF 5 PERSONS OR MORE - Vehicles licenced to carry 5 or more passengers may charge Tariff 2 for journeys only when 5 or more persons are travelling and Tariff 3 for journeys only when 5 or more persons are travelling between the hours of 11.00pm and 6am or for a journey commenced on a Sunday or a public holiday. Tariff 1 applies when 4 or less passengers travel

NOTE: These are the maximum fares allowed. Passengers may negotiate a lesser fare at the discretion of the owner/driver. Hiring covering two tariff periods may be charged proportionately according to time or distance in each tariff period.

Soiling fee

£100 per occasion vehicle is soiled and is required to be withdrawn from service for valeting.

Vehicles carrying 5 or more people

Vehicles licensed to carry 5 or more passengers can charge Tariff 2 for journeys when 5 or more persons are travelling

These vehicles can charge Tariff 3 for journeys when 5 or more persons are travelling between 11.00pm and 6am or for any journey commenced on a Sunday or a Public Holiday.

Figure 5 - Maximum table of fares

Private Hire and Taxi Monthly (PHTM) magazine publish monthly league tables of the fares in Licensing Authorities in the UK. The Tariff 1 fares for a two mile journey (distance costs only) are compared and ranked. The lower the ranking number, the more expensive the journey, compared with other authorities. The October 2023 table indicated that the fares in Braintree were ranked 174 out of 345 authorities listed. This ranking suggests that hackney carriage fares in Braintree are average. The cost of a 2 mile trip in Braintree (distance tariff only) was £6.90

A similar comparison of fares was undertaken for the 2016 unmet demand survey. In 2016, the ranking for Braintree was 112. The cost of a 2 mile fare in 2016 was £6.00.

The cost of a 2 mile fare in Braintree is compared with the cost of a 2 mile fare in each of the licensing authorities in Essex, Suffolk and Cambridgeshire.

Table 3 - Comparison of 2 mile fares in Essex, Suffolk and Cambridgeshire

	May-16	Oct-23	Change
Babergh	£5.18	£7.00	35.1%
Basildon	£5.80	£7.20	24.1%
Braintree	£6.00	£6.90	15.0%
Brentwood	£6.20	£8.10	30.6%
Cambridge	£6.40	£7.30	14.1%
Castle Point	£6.00	£6.40	6.7%
Chelmsford	£6.50	£7.70	18.5%
Colchester	£6.80	£6.90	1.5%
East Cambridgeshire	£5.50	£6.80	23.6%
East Suffolk (North) (Previously Suffolk Coastal)	£5.60	£8.40	50.0%
East Suffolk (South) (Previously Waveney)	£6.20	£6.20	0.0%
Epping Forest	£5.50	£5.50	0.0%
Fenland	£5.30	£6.20	17.0%
Harlow	£6.40	£7.20	12.5%
Huntingdonshire	£5.50	£8.30	50.9%
Ipswich	£6.00	£7.50	25.0%
Maldon	No Council tariff set		
Mid Suffolk	£5.40	£7.50	38.9%
Rochford	£6.00	£6.60	10.0%
South Cambridgeshire	£6.40	£7.30	14.1%
Southend On Sea	£6.03	£6.80	12.8%
Tendring	£5.95	£6.80	14.3%
Thurrock	£6.00	£6.00	0.0%
Uttlesford	£5.80	£8.30	43.1%
West Suffolk (merger of Forest Heath and St Edmundsbury). [Forest Heath]	£5.60	£7.20	28.6%
West Suffolk (merger of Forest Heath and St Edmundsbury). [St Edmundsbury]	£5.40	£7.20	33.3%

The average 2 mile fare across the licensing areas listed was £7.09.

Taxi fares can be influenced by a range of factors. The principal factor which influences fares is the operating cost of hackney carriages. The rate at which fares change over time can vary between authority areas.

Operating costs for hackney carriages can be influenced by a range of factors. These include:

- Licensing policy,

- Distribution and density of population,
- Type of land use and related hackney carriage travel demand,
- The number of active taxi ranks and the distribution of ranks,
- The average distance of hackney carriage fares,
- Variation in demand from day to day and time of day,
- The number of drivers driving hackney carriages,
- Typical shift patterns for driving hackney carriages and the proportion of hackney carriages which are operated part-time, full time by a single driver and full time on multiple shifts each day.

In some licensing areas, the demand for hackney carriages is heavily influenced by demand from the local population for leisure trips. In areas with large numbers of businesses which attract business visitors, the demand associated with those businesses can influence demand, especially during week day, day time periods. Similarly, areas with a large number of hotel rooms are likely to generate a significant level of visitor related demand. Areas which have a large number of taxi ranks distributed around the area, may offer hackney carriages to option to return to the nearest rank, to wait for a fare. Other areas with fewer ranks may require hackney carriages to return to the same rank after each fare. Consequently, the level of 'dead mileage' between dropping off a fare and picking up the next fare, can vary significantly between areas. Some areas may contain locations which concentrate highly active night time economy venues. Such localities can attract significant demand and generate significant peaks in demand.

Comparison of 2016 with 2023 data

We can compare the increase in fares from 2016 to 2023 with inflation between 2016 and 2023.

The fares table position in 2016 was determined from May 2016 tables. The office of national statistics publishes a range of cost indices and inflation indices, which may be compared with the change in a 2 mile fare in Braintree. Inflation between 2016 and 2023 was derived by using the index values for May 2016 and comparing with the most recent available index values for 2023.

Relative inflation from 2016 to 2023 for several costs are compared in the following table.

Cost or inflation measure	Inflation from May 2016 to 2023 (latest available data)
Hackney Carriage 2 mile fare (PHTM)	15%
Consumer price inflation, including housing costs (CPIH)	28.4%
Consumer price inflation (CPI)	30.8%
Cost of new cars	32.5%
Cost of used cars	24.9%
Liquid Fuels, Vehicle Fuels & Lubricants	37.3%
Passenger transport by railway	32.4%
Passenger transport by road	48.5%

Median pay, East Region	37.7%
Median pay, UK	36.8%

The principal operating costs associated with hackney carriage services are vehicle cost, maintenance cost, fuel and driver wages. Each of these elements have increased in costs by more than the increase in hackney carriage fares since 2016.

2.6 Rail passenger growth

There are two railway stations in Braintree district, which are served by taxi ranks. The busier rank is in Witham. The station in Braintree is served by a taxi rank. However, the rank markings on the roadway outside the station were removed prior to the survey. Hackney carriage activity was monitored at the taxi ranks in Witham and in Braintree. The level of rail passenger volumes at each station is likely to influence the level of licensed vehicle hires associated with each location.

Table 4 and Figure 6 illustrate historic passenger numbers passing through the two railway stations. Passenger numbers during the year 2020 – 21 reduced significantly, compared with earlier years, owing to the impact of Covid-19 mitigation measures and travel restrictions. The data for 2021-22 indicates some recovery. However, the number of passengers using the stations has not recovered to pre-Covid-19 levels.

Table 4 - Annual passenger entries and exits through selected Braintree District railway stations

Year	Witham	Braintree
2009 - 10	2,076,532	813,182
2010 - 11	2,159,090	831,670
2011 - 12	2,251,940	819,498
2012 - 13	2,244,774	814,944
2013 - 14	2,349,736	806,471
2014 - 15	2,380,266	808,240
2015 - 16	2,377,010	803,716
2016 - 17	2,343,972	788,006
2017 - 18	2,331,628	746,512
2018 - 19	2,349,496	727,982
2019 - 20	2,299,342	730,086
2020 - 21	479,098	174,914
2021 - 22	1,277,154	460,478

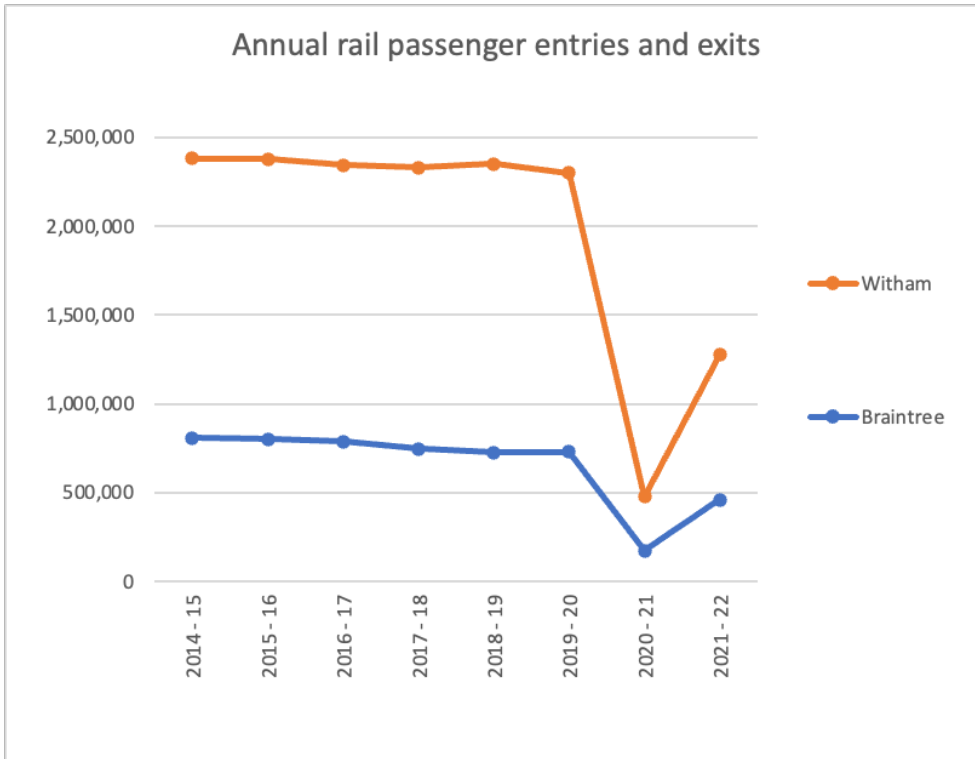


Figure 6 - Annual passenger entries and exits through selected Braintree Railway Stations

3 RANK SURVEYS

Our methodology involved obtaining video footage of activity at all ranks in the licensing area. The video footage was then analysed to identify hours at each rank for which each rank was active.

Video footage was collected over a period of two weeks from 7:00 on Sunday 18th June 2023 through to 7:00 on Sunday morning, 2nd July 2023. This coverage ensured that weekday and weekend activity was represented and encompassed an end of month Friday and Saturday (which are commonly busier than earlier in the month).

Ranks which were known to be active, as well as ranks which were thought to be rarely used, were included in the video footage.

The ranks surveyed were:

- Trinity Street, Halstead
- Braintree Village rank, Bus stops
- Station Approach, Braintree
- Rayne Road, Braintree
- Manor Street, Braintree
- Albert Road, Witham (Station)

The following figures illustrate the levels of usage observed at each of the ranks observed.

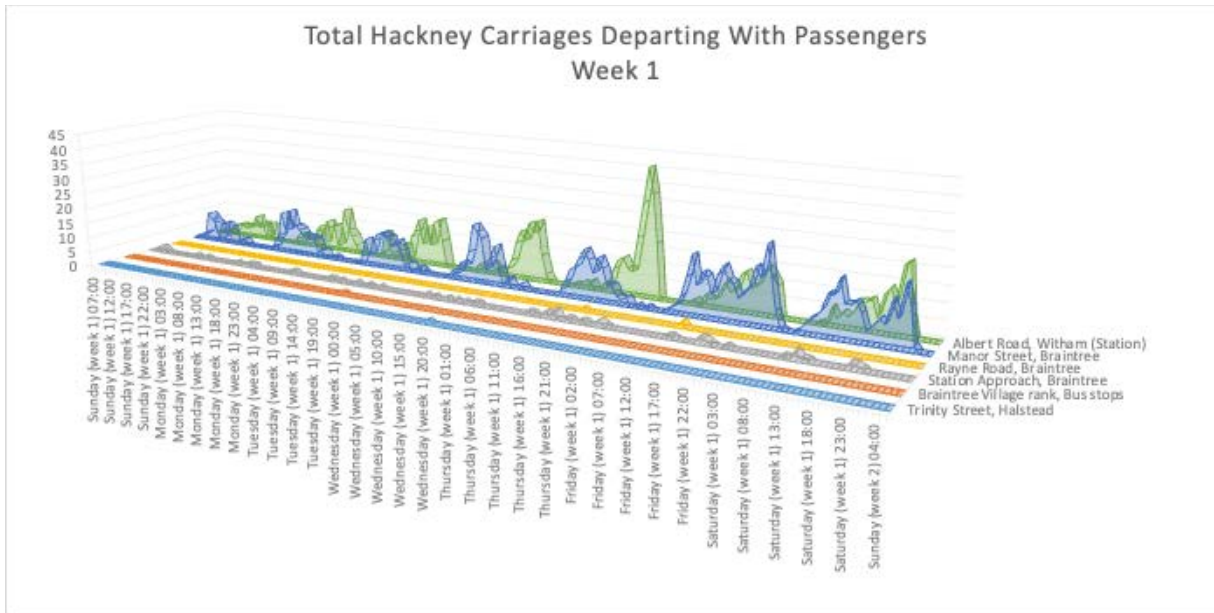


Figure 7 – Hourly volume of hackney carriages departing each rank, with passengers – Week 1

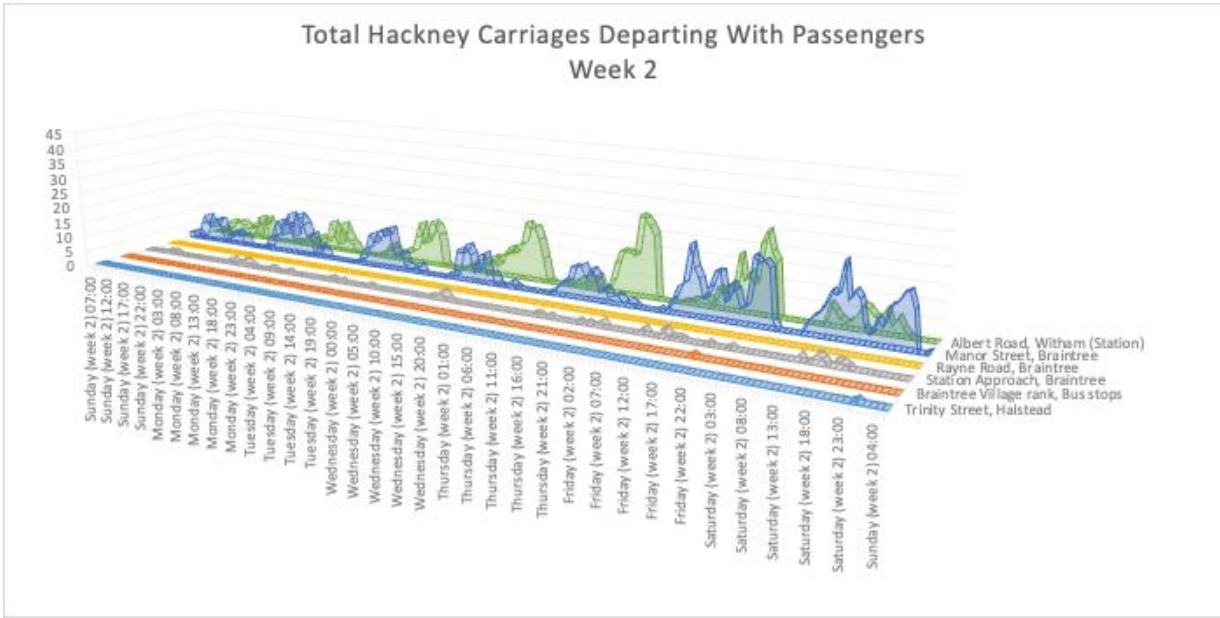


Figure 8 - Hourly volume of hackney carriages departing each rank, with passengers – Week 2

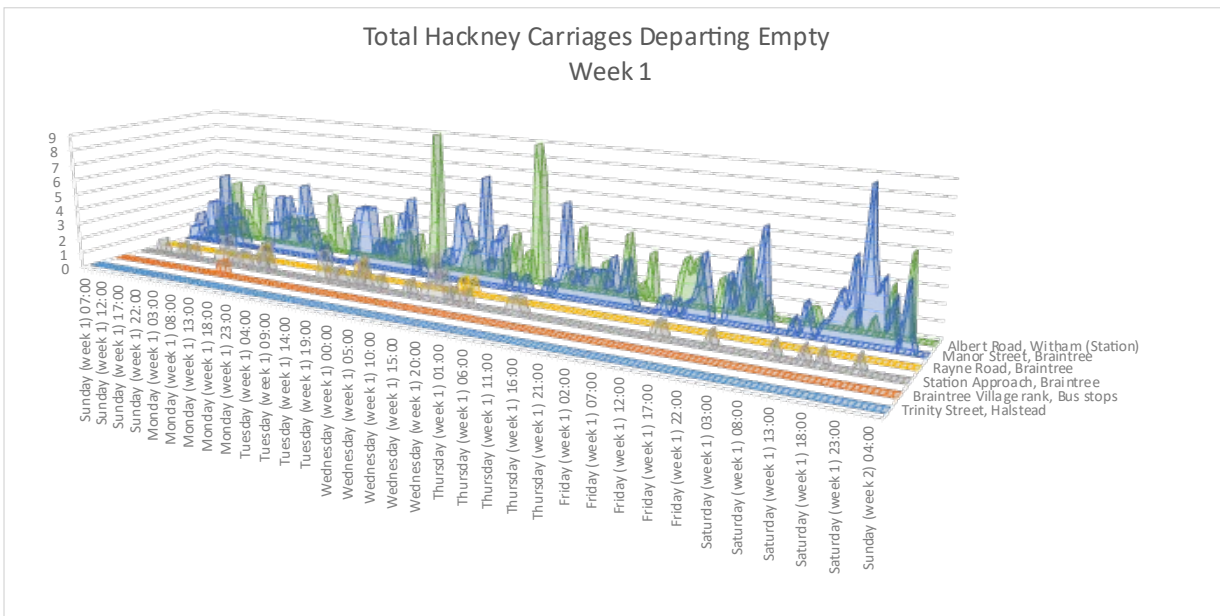


Figure 9 - Hourly volume of hackney carriages departing each rank, without passengers – Week 1

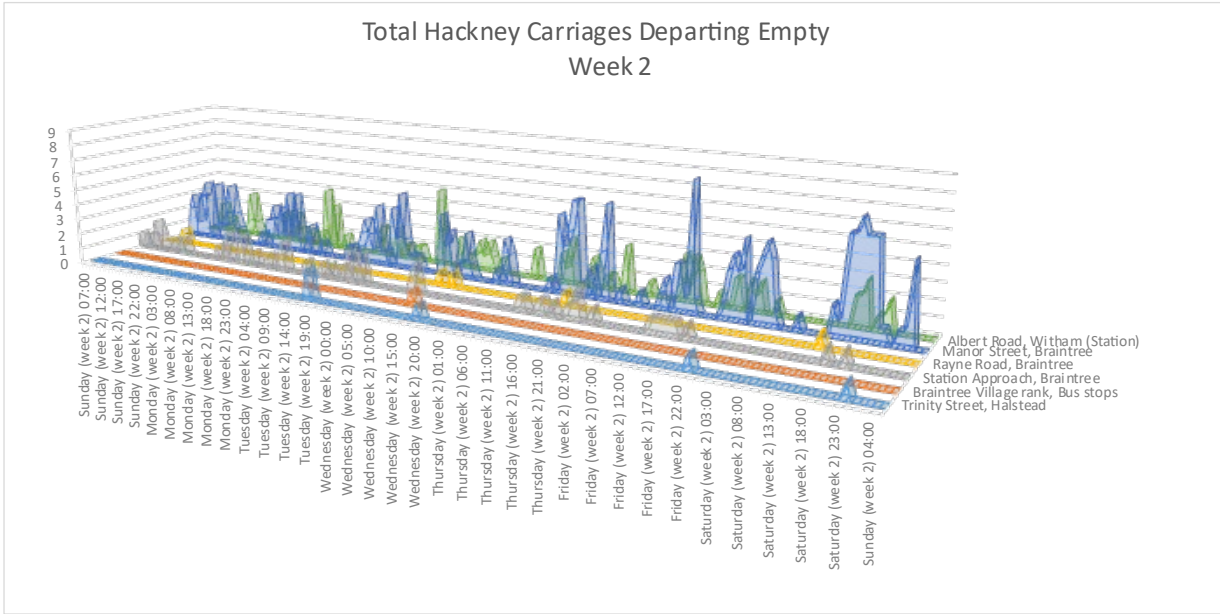


Figure 10 - Hourly volume of hackney carriages departing each rank, without passengers – Week 2

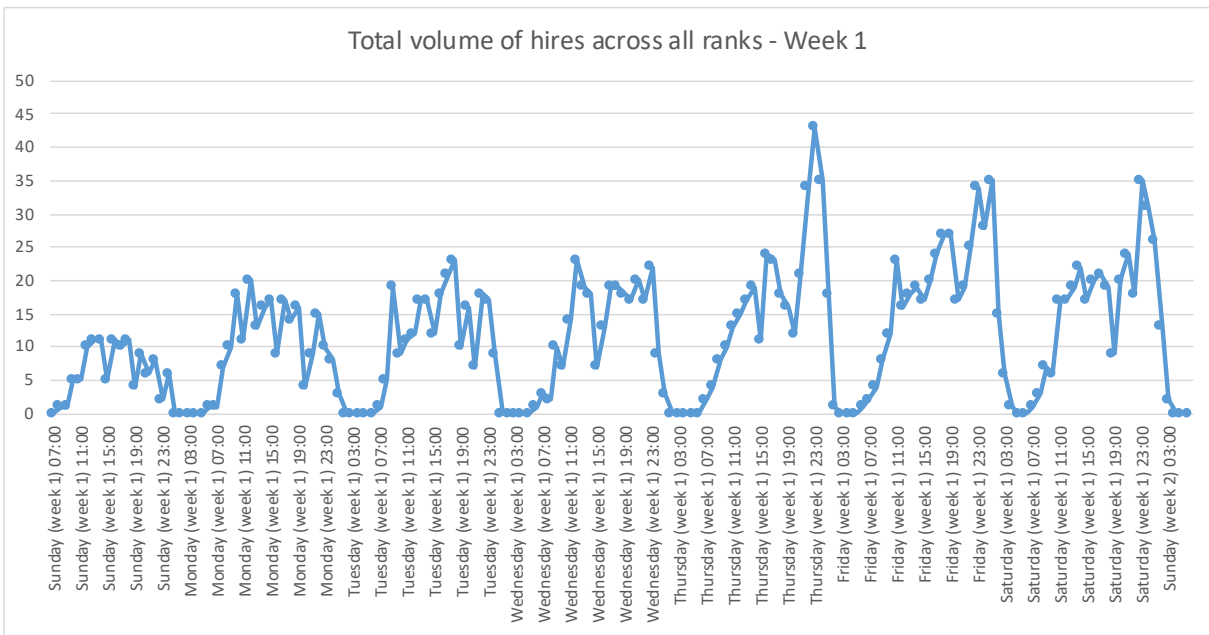


Figure 11 - Aggregate hourly volume of hackney carriages departing all ranks, with passengers – Week 1

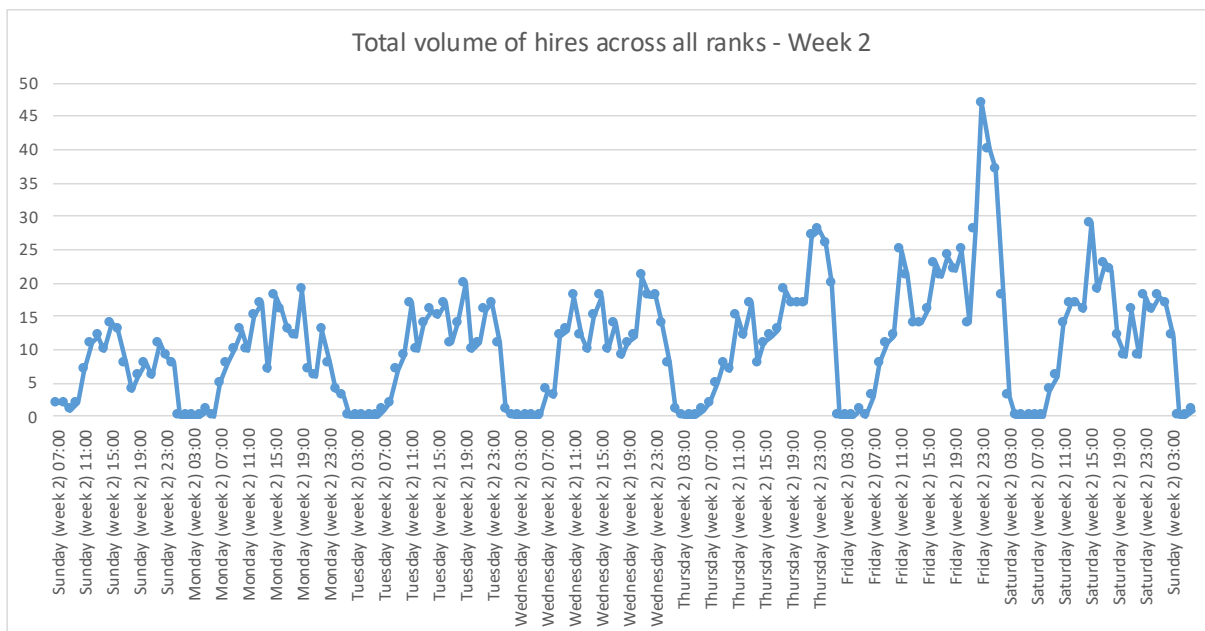


Figure 12 - Aggregate hourly volume of hackney carriages departing all ranks, with passengers – Week 2

3.1 Daily summary data

The observed data at each rank is summarised in the following tables, for each day of observation and as aggregate values for week 1 and week 2. Daily totals reflect periods from 7:00 am to 7:00 am the following morning.

Table 5 - Daily rank statistics Sunday to Monday – Week 1

Rank location	Total hackney carriages departing the ranks empty	Total hackney carriages departing the ranks with passengers	Total hackney carriages departing the ranks	Total passengers departing the ranks	Average passengers per hackney carriage
Total for all locations	50	117	167	178	1.5
Trinity Street, Halstead	0	0	0	0	0.0
Braintree Village rank, Bus stops	0	0	0	0	0.0
Station Approach, Braintree	4	5	9	9	1.8
Rayne Road, Braintree	0	0	0	0	0.0
Manor Street, Braintree	26	58	84	79	1.4
Albert Road, Witham (Station)	20	54	74	90	1.7

Table 6 - Daily rank statistics Monday to Tuesday – Week 1

Rank location	Total hackney carriages departing the ranks empty	Total hackney carriages departing the ranks with passengers	Total hackney carriages departing the ranks	Total passengers departing the ranks	Average passengers per hackney carriage
Total for all locations	70	218	288	274	1.3
Trinity Street, Halstead	0	0	0	0	0.0
Braintree Village rank, Bus stops	1	0	1	0	0.0
Station Approach, Braintree	11	6	17	8	1.3
Rayne Road, Braintree	1	0	1	0	0.0
Manor Street, Braintree	35	111	146	144	1.3
Albert Road, Witham (Station)	22	101	123	122	1.2

Table 7 - Daily rank statistics Tuesday to Wednesday – Week 1

Rank location	Total hackney carriages departing the ranks empty	Total hackney carriages departing the ranks with passengers	Total hackney carriages departing the ranks	Total passengers departing the ranks	Average passengers per hackney carriage
Total for all locations	79	243	322	328	1.3
Trinity Street, Halstead	0	0	0	0	0.0
Braintree Village rank, Bus stops	0	1	1	4	4.0
Station Approach, Braintree	9	6	15	6	1.0
Rayne Road, Braintree	1	0	1	0	0.0
Manor Street, Braintree	46	104	150	139	1.3
Albert Road, Witham (Station)	23	132	155	179	1.4

Table 8 - Daily rank statistics Wednesday to Thursday – Week 1

Rank location	Total hackney carriages departing the ranks empty	carriages departing the ranks with passengers	Total hackney carriages departing the ranks	Total passengers departing the ranks	Average passengers per hackney carriage
Total for all locations	93	260	353	319	1.2
Trinity Street, Halstead	0	1	1	2	2.0
Braintree Village rank, Bus stops	0	0	0	0	0.0
Station Approach, Braintree	12	7	19	7	1.0
Rayne Road, Braintree	2	0	2	0	0.0
Manor Street, Braintree	45	117	162	149	1.3
Albert Road, Witham (Station)	34	135	169	161	1.2

Table 9 - Daily rank statistics Thursday to Friday – Week 1

Rank location	Total hackney carriages departing the ranks empty	Total hackney carriages departing the ranks with passengers	Total hackney carriages departing the ranks	Total passengers departing the ranks	Average passengers per hackney carriage
Total for all locations	56	345	401	439	1.3
Trinity Street, Halstead	0	0	0	0	0.0
Braintree Village rank, Bus stops	0	0	0	0	0.0
Station Approach, Braintree	2	16	18	24	1.5
Rayne Road, Braintree	0	1	1	1	1.0
Manor Street, Braintree	34	126	160	170	1.3
Albert Road, Witham (Station)	20	202	222	244	1.2

Table 10 - Daily rank statistics Friday to Saturday – Week 1

Rank location	Total hackney carriages departing the ranks empty	Total hackney carriages departing the ranks with passengers	Total hackney carriages departing the ranks	Total passengers departing the ranks	Average passengers per hackney carriage
Total for all locations	64	397	461	554	1.4
Trinity Street, Halstead	0	0	0	0	0.0
Braintree Village rank, Bus stops	0	0	0	0	0.0
Station Approach, Braintree	3	8	11	13	1.6
Rayne Road, Braintree	0	2	2	4	2.0
Manor Street, Braintree	36	253	289	361	1.4
Albert Road, Witham (Station)	25	134	159	176	1.3

Table 11 - Daily rank statistics Saturday to Sunday – Week 1

Rank location	Total hackney carriages departing the ranks empty	Total hackney carriages departing the ranks with passengers	Total hackney carriages departing the ranks	Total passengers departing the ranks	Average passengers per hackney carriage
Total for all locations	67	347	414	550	1.6
Trinity Street, Halstead	0	0	0	0	0.0
Braintree Village rank, Bus stops	0	0	0	0	0.0
Station Approach, Braintree	4	11	15	19	1.7
Rayne Road, Braintree	0	0	0	0	0.0
Manor Street, Braintree	49	192	241	288	1.5
Albert Road, Witham (Station)	14	144	158	243	1.7

Table 12 - Aggregate rank statistics – Week 1

Rank location	Total hackney carriages departing the ranks empty	Total hackney carriages departing the ranks with passengers	Total hackney carriages departing the ranks	Total passengers departing the ranks
Total for all locations	479	1927	2406	2642
Trinity Street, Halstead	0	1	1	2
Braintree Village rank, Bus stops	1	1	2	4
Station Approach, Braintree	45	59	104	86
Rayne Road, Braintree	4	3	7	5
Manor Street, Braintree	271	961	1232	1330
Albert Road, Witham (Station)	158	902	1060	1215

Table 13 - Daily rank statistics Sunday to Monday – Week 2

Rank location	Total hackney carriages departing the ranks empty	Total hackney carriages departing the ranks with passengers	Total hackney carriages departing the ranks	Total passengers departing the ranks	Average passengers per hackney carriage
Total for all locations	52	135	187	199	1.5
Trinity Street, Halstead	0	0	0	0	0.0
Braintree Village rank, Bus stops	0	0	0	0	0.0
Station Approach, Braintree	10	3	13	3	1.0
Rayne Road, Braintree	1	0	1	0	0.0
Manor Street, Braintree	33	71	104	100	1.4
Albert Road, Witham (Station)	8	61	69	96	1.6

Table 14 - Daily rank statistics Monday to Tuesday – Week 2

Rank location	Total hackney carriages departing the ranks empty	Total hackney carriages departing the ranks with passengers	Total hackney carriages departing the ranks	Total passengers departing the ranks	Average passengers per hackney carriage
Total for all locations	56	204	260	273	1.3
Trinity Street, Halstead	0	0	0	0	0.0
Braintree Village rank, Bus stops	0	0	0	0	0.0
Station Approach, Braintree	12	11	23	16	1.5
Rayne Road, Braintree	0	0	0	0	0.0
Manor Street, Braintree	27	126	153	163	1.3
Albert Road, Witham (Station)	17	67	84	94	1.4

Table 15 - Daily rank statistics Tuesday to Wednesday – Week 2

Rank location	Total hackney carriages departing the ranks empty	Total hackney carriages departing the ranks with passengers	Total hackney carriages departing the ranks	Total passengers departing the ranks	Average passengers per hackney carriage
Total for all locations	62	219	281	273	1.2
Trinity Street, Halstead	2	0	2	0	0.0
Braintree Village rank, Bus stops	0	0	0	0	0.0
Station Approach, Braintree	8	4	12	5	1.3
Rayne Road, Braintree	0	0	0	0	0.0
Manor Street, Braintree	36	107	143	133	1.2
Albert Road, Witham (Station)	16	108	124	135	1.3

Table 16 - Daily rank statistics Wednesday to Thursday – Week 2

Rank location	Total hackney carriages departing the ranks empty	Total hackney carriages departing the ranks with passengers	Total hackney carriages departing the ranks	Total passengers departing the ranks	Average passengers per hackney carriage
Total for all locations	38	242	280	299	1.2
Trinity Street, Halstead	1	0	1	0	0.0
Braintree Village rank, Bus stops	1	0	1	0	0.0
Station Approach, Braintree	3	6	9	7	1.2
Rayne Road, Braintree	2	0	2	0	0.0
Manor Street, Braintree	17	76	93	96	1.3
Albert Road, Witham (Station)	14	160	174	196	1.2

Table 17 - Daily rank statistics Thursday to Friday – Week 2

Rank location	Total hackney carriages departing the ranks empty	Total hackney carriages departing the ranks with passengers	Total hackney carriages departing the ranks	Total passengers departing the ranks	Average passengers per hackney carriage
Total for all locations	65	282	347	375	1.3
Trinity Street, Halstead	0	0	0	0	0.0
Braintree Village rank, Bus stops	0	0	0	0	0.0
Station Approach, Braintree	10	8	18	11	1.4
Rayne Road, Braintree	1	0	1	0	0.0
Manor Street, Braintree	40	92	132	105	1.1
Albert Road, Witham (Station)	14	182	196	259	1.4

Table 18 - Daily rank statistics Friday to Saturday – Week 2

Rank location	Total hackney carriages departing the ranks empty	Total hackney carriages departing the ranks with passengers	Total hackney carriages departing the ranks	Total passengers departing the ranks	Average passengers per hackney carriage
Total for all locations	80	426	506	610	1.4
Trinity Street, Halstead	1	0	1	0	0.0
Braintree Village rank, Bus stops	0	1	1	2	2.0
Station Approach, Braintree	7	10	17	15	1.5
Rayne Road, Braintree	0	0	0	0	0.0
Manor Street, Braintree	51	241	292	355	1.5
Albert Road, Witham (Station)	21	174	195	238	1.4

Table 19 - Daily rank statistics Saturday to Sunday – Week 2

Rank location	Total hackney carriages departing the ranks empty	Total hackney carriages departing the ranks with passengers	Total hackney carriages departing the ranks	Total passengers departing the ranks	Average passengers per hackney carriage
Total for all locations	65	295	360	476	1.6
Trinity Street, Halstead	1	1	2	4	4.0
Braintree Village rank, Bus stops	0	0	0	0	0.0
Station Approach, Braintree	2	13	15	15	1.2
Rayne Road, Braintree	1	0	1	0	0.0
Manor Street, Braintree	50	210	260	352	1.7
Albert Road, Witham (Station)	11	71	82	105	1.5

Table 20 - Aggregate rank statistics – Week 2

Rank location	Total hackney carriages departing the ranks empty	Total hackney carriages departing the ranks with passengers	Total hackney carriages departing the ranks	Total passengers departing the ranks
Total for all locations	418	1803	2221	2505
Trinity Street, Halstead	5	1	6	4
Braintree Village rank, Bus stops	1	1	2	2
Station Approach, Braintree	52	55	107	72
Rayne Road, Braintree	5	0	5	0
Manor Street, Braintree	254	923	1177	1304
Albert Road, Witham (Station)	101	823	924	1123

During the two weeks of the 2023 survey 3,730 hires from ranks (hackney carriages departing with passengers) were observed.

3.2 Comparison with 2016 observations

A hackney carriage unmet demand survey was undertaken in 2016. The unmet demand survey incorporated rank observations in April 2016. The 2016 rank surveys captured activity data from a Thursday morning through to the following Sunday morning. The ranks at Witham Station, Manor Street and Station Approach, Braintree were active in 2016. There was little activity observed at other ranks during the 2016 survey.

Data from 2016 has been compared with comparable 2023 observations from Thursday morning (week 1) to the following Monday morning, for the ranks at Witham Station, Manor Street and Station Approach, Braintree. The following figures compare the hourly profiles of hackney carriages departing each rank with passengers.

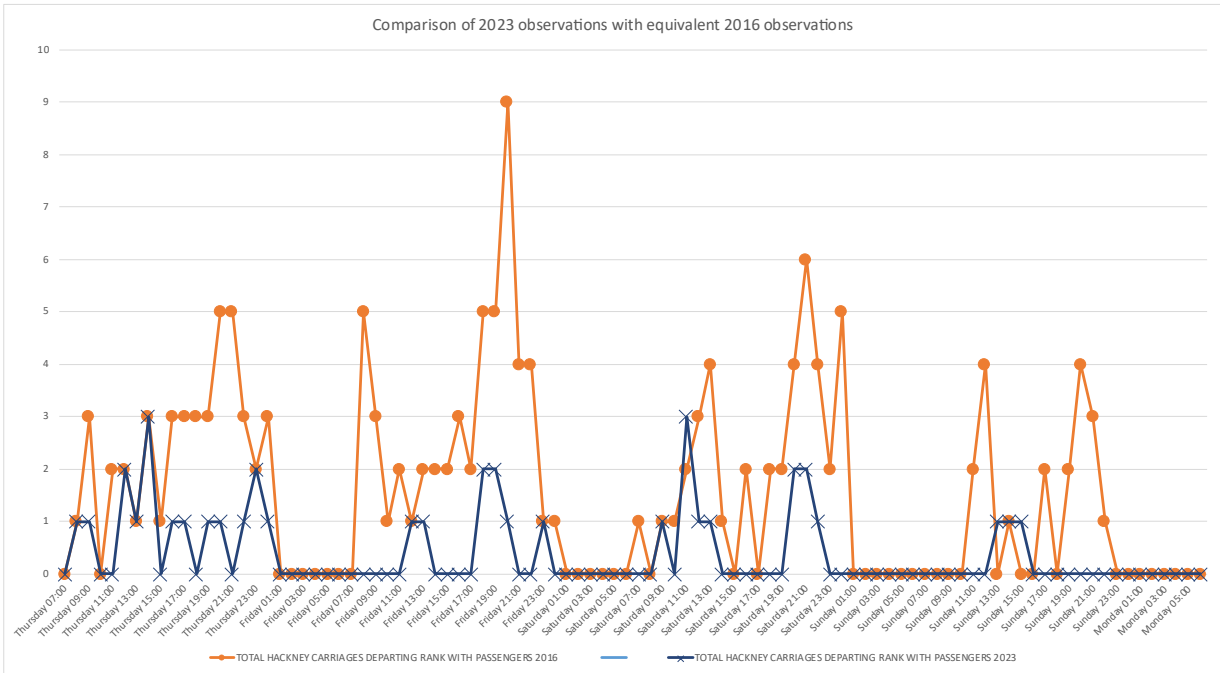


Figure 13 - Comparison of 2016 with 2023 Hackney Carriages with passengers per hour - Station Approach, Braintree

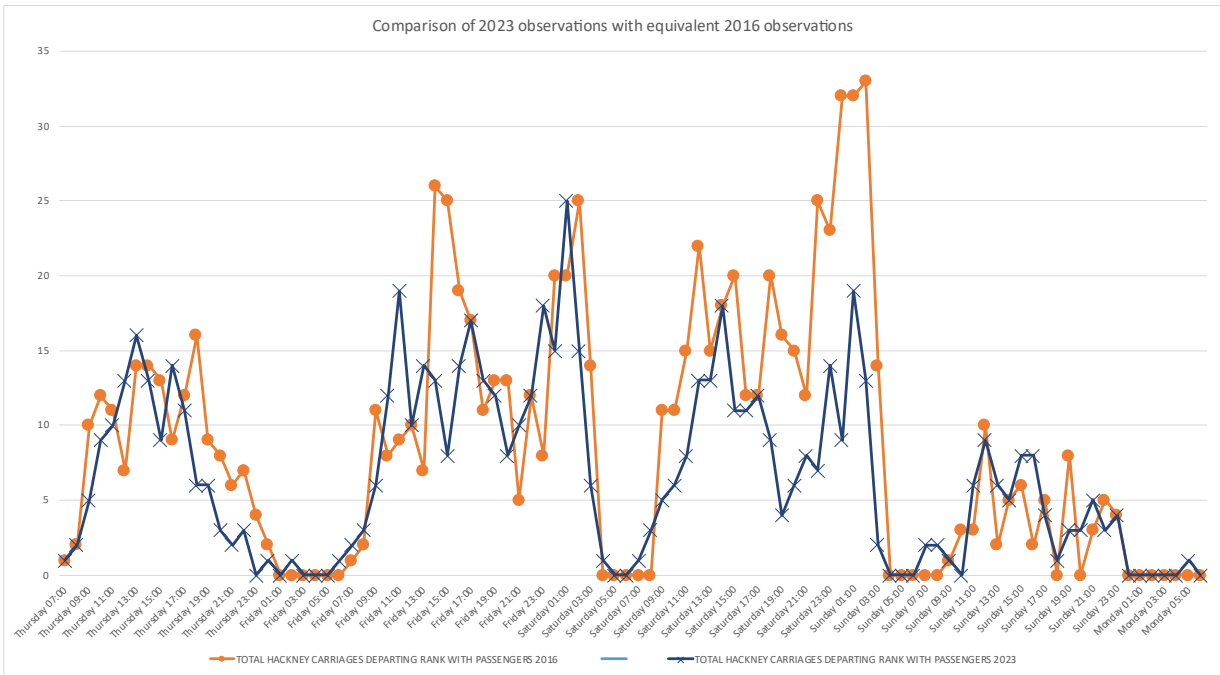


Figure 14 - Comparison of 2016 with 2023 Hackney Carriages with passengers per hour - Manor Street, Braintree

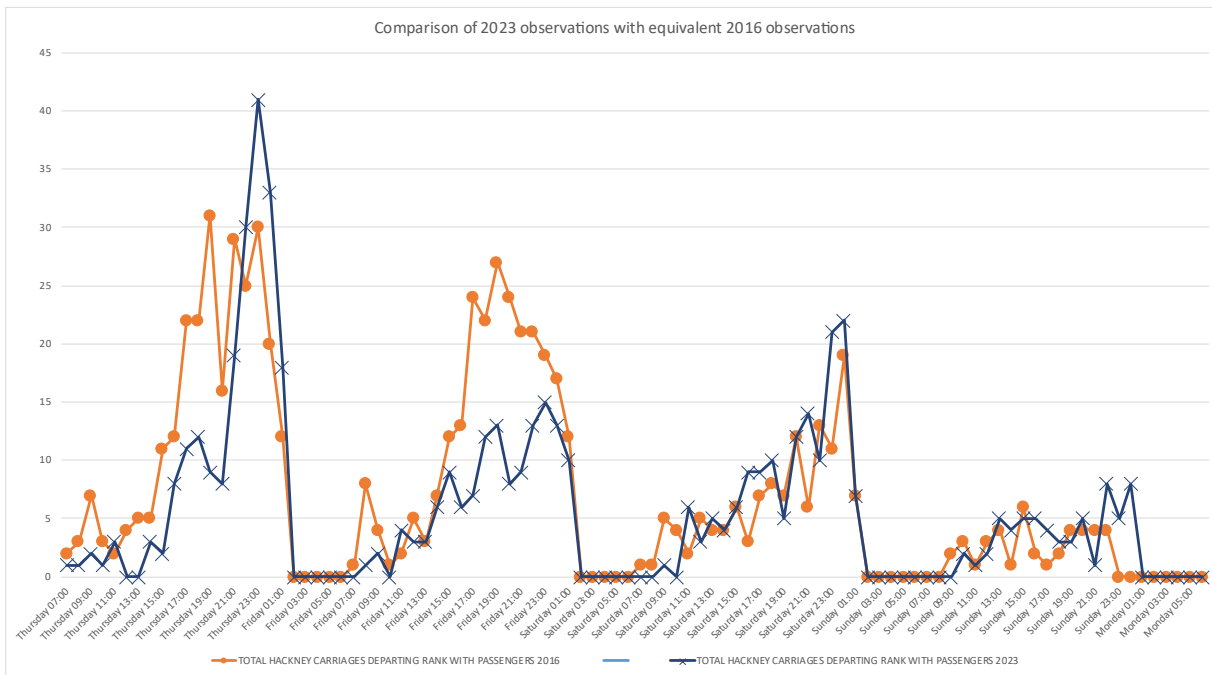


Figure 15 - Comparison of 2016 with 2023 Hackney Carriages with passengers per hour - Albert Road (Railway Station), Witham

Comparisons of daily totals are presented in the following tables:

Table 21 - Daily total hackney carriages with passengers, comparison of 2016 with 2023 observations – Station Approach, Braintree

Daily Total Comparisons	TOTAL HACKNEY CARRIAGES DEPARTING RANK WITH PASSENGERS 2016	TOTAL HACKNEY CARRIAGES DEPARTING RANK WITH PASSENGERS 2023	Difference (2023 - 2016)
Thursday to Friday total	43	16	-27
Friday to Saturday total	52	8	-44
Saturday to Sunday total	40	11	-29
Sunday to Monday total	19	3	-16
Four day total	154	38	-116

Table 22 - Daily total hackney carriages with passengers, comparison of 2016 with 2023 observations – Manor Street, Braintree

Daily Total Comparisons	TOTAL HACKNEY CARRIAGES DEPARTING RANK WITH PASSENGERS 2016	TOTAL HACKNEY CARRIAGES DEPARTING RANK WITH PASSENGERS 2023	Difference (2023 - 2016)
Thursday to Friday total	157	126	-31
Friday to Saturday total	276	253	-23
Saturday to Sunday total	358	192	-166
Sunday to Monday total	57	71	14
Four day total	848	642	-206

Table 23 - Daily total hackney carriages with passengers, comparison of 2016 with 2023 observations – Albert Road (Railway Station), Witham

Daily Total Comparisons	TOTAL HACKNEY CARRIAGES DEPARTING RANK WITH PASSENGERS 2016	TOTAL HACKNEY CARRIAGES DEPARTING RANK WITH PASSENGERS 2023	Difference (2023 - 2016)
Thursday to Friday total	261	202	-59
Friday to Saturday total	243	134	-109
Saturday to Sunday total	125	144	19
Sunday to Monday total	41	61	20
Four day total	670	541	-129

The profile of demand at each of the ranks compared was similar in 2016 to the profile in 2023. However, the number of hires observed at each rank was generally lower in 2023 than in 2016.

At the Station Approach, Braintree rank, the number of hires observed in 2023 was 75% lower than in 2016, over the 4 day comparison period.

At the Manor Street rank in Braintree, the number of hires observed in 2023 was 24% lower than in 2016, over the 4 day comparison period.

At the Albert Road (Witham Station) rank in Braintree, the number of hires observed in 2023 was 19% lower than in 2016, over the 4 day comparison period.

Over all three locations, the number of hires observed in 2023 was around 27% lower than the number of hires observed in 2016.

3.3 Passenger waiting

Passenger waiting was observed at the three main ranks, (Station Approach, Braintree; Manor Street, Braintree and Albert Road (Witham Station)).

A profile of the number of waiting passengers is presented in the following figures. The number of waiting passengers is presented along with the total number of passengers, in order to compare the two profiles.

Passenger waiting is recorded if there are no hackney carriages present at the rank and passengers are clearly waiting in order to hire hackney carriages when they arrive at the rank. On occasions, there may be queues of passengers which form and a queue of hackney carriages joining a rank and moving forward to pick up passengers. On such occasions, as there are hackney carriages present, passengers are not deemed to be waiting for hackney carriages to arrive at the rank. Delays to passengers on such occasions are due to the operation of the rank and hence, not recorded as passenger waiting.

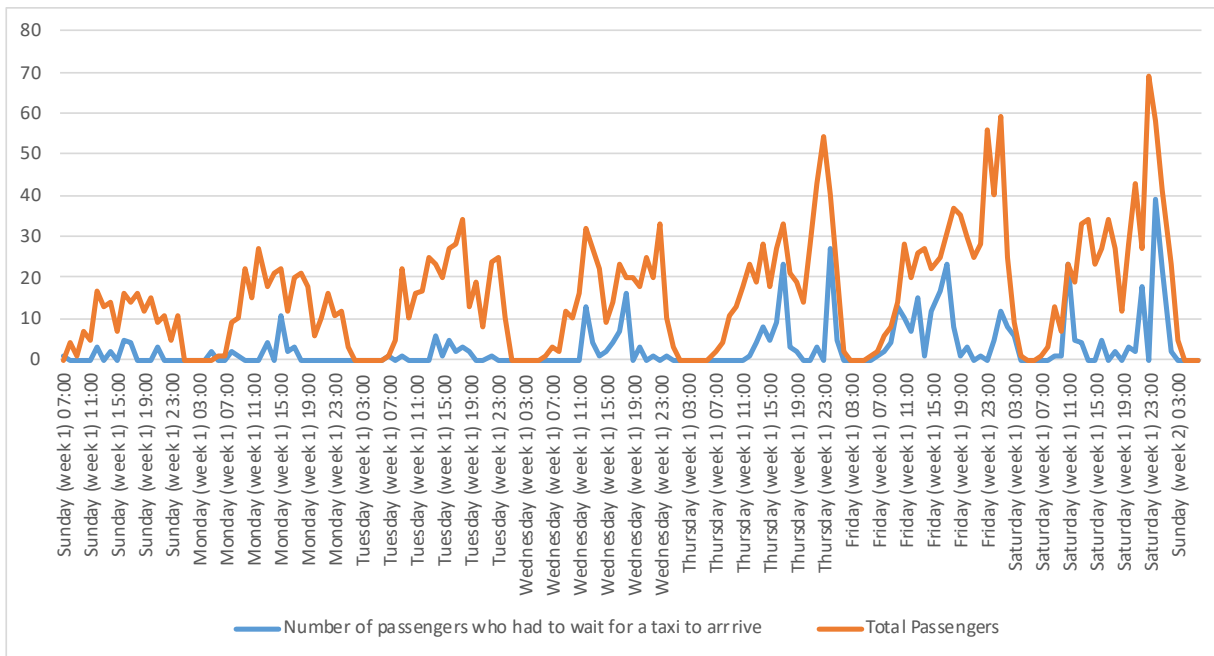


Figure 16 - Profile of total and waiting passengers per hour – Week 1

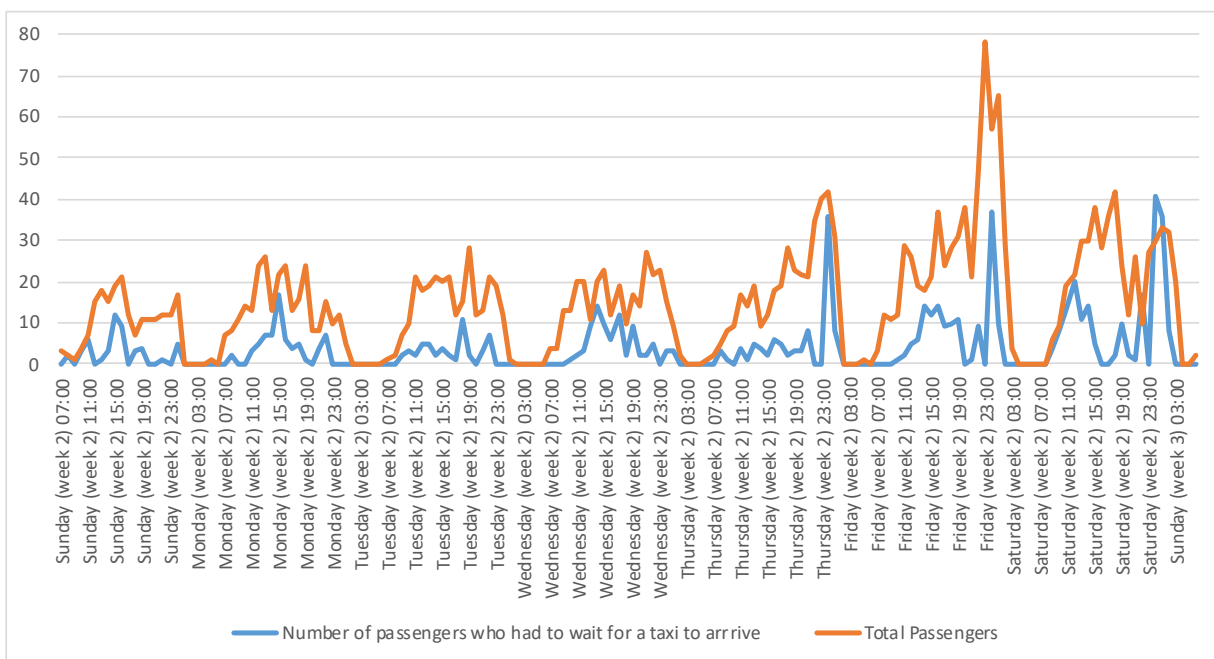


Figure 17 - Profile of total and waiting passengers per hour – Week 2

The total number of waiting passengers, over the two week period, was 1,156 passengers, out of a total of 5,147 (22% of all passengers). A handful of passengers were observed waiting at Station Approach in Braintree. A significant number of passengers were observed waiting at Witham Station. However, passenger waiting at Witham was primarily observed at night. Passenger waiting was observed at the Manor Street rank during both daytime and night time hours.

The maximum wait time observed was one hour and 3 minutes. This was observed on the rank at Manor Street, Braintree. Two passengers commenced waiting at 00:59 on 23rd June. 179 people waited more than 15 minutes and 30 people waited more than 30 minutes.

A notable feature of Figure 17 was that late on Saturday night (week 2), the number of waiting passengers exceeded the number of passengers over a period of two hours. It is worth noting that the time that passengers started waiting was used to classify the hour that passengers were waiting in. Time that passengers hire a hackney carriage is recorded when they enter the hackney carriage. Therefore, if passengers start waiting close to the end of the hour and the wait time lasts until the following hour, then this can lead to the feature noted. A further influence on the profile of waiting passengers versus all passengers is that some instances of passengers waiting, then giving up and leaving the rank without hiring a hackney carriage, were recorded. Such incidences can also lead to the number of waiting passengers exceeding the total number of passengers (who board hackney carriages).

The number of waiting passengers and the duration of waiting is taken into account when assessing whether the level of unmet demand is significant.

Some intending passengers waited at the ranks then gave up waiting and walked away from the ranks. These passengers were included in the passenger waiting data and separately identified. The proportion of intending passengers who gave up waiting is an indication of latent unmet demand. The number of waiting passengers who gave up waiting was 130. This represents 19% of all waiting passengers and 2.5% of all passengers.

3.4 Synopsis of activity at ranks

Trinity Street, Halstead

The rank on Trinity Street lies outside the Dorrington Hotel and is adjacent to a fast food outlet. Hackney carriages did not normally wait on the rank for fares. Occasionally, hackney carriages were seen on the rank, either after they had dropped off passengers, or in order to pick up food from the fast food outlet. Two hires were observed at the rank. Both appeared to have been pre-booked hires. Cars and vans were often observed either waiting on the rank or parked on the rank for extended periods.

Braintree Village rank, Bus stops

The rank at Braintree Village was used by hackney carriages to drop off passengers and occasionally to pick up passengers. Two hires were observed and both appeared to have been pre-booked.

Station Approach, Braintree

The road markings for the taxi rank on Station Approach had been removed several months prior to the survey. Whilst the road markings were not present, the signage indicating the presence of the taxi rank was still in place. Much of the rank was used by vehicles to park, both during the daytime and at night. There were no occasions when the taxi rank was fully

occupied by parked vehicles. However, there were numerous occasions when only one or two spaces were available on the rank for hackney carriages to wait.

Hackney carriages tended to arrive at the rank shortly before a train was due to arrive. Generally one or two hackney carriages would wait for train arrivals. Hackney carriages were also observed occasionally driving past the rank. Presumably checking for waiting passengers. However, unless a train was due to arrive, such passing hackney carriages didn't stop at the rank, or would only pause briefly.

Occasionally passengers who arrived on a train would need to wait for a hackney carriage to arrive at the rank. Generally, this wait was due to other passengers from the same arrival having hired all of the waiting hackney carriages. Most of these passengers were picked up by other passing hackney carriages or by returning hackney carriages, after a few minutes. Occasionally, passengers would give up waiting after a few minutes and leave the rank.

Some passengers pre-booked hires by licensed vehicles. These hires were fulfilled by both hackney carriages and private hire vehicles. Some of the passengers waiting for a vehicle to arrive and fulfil their booking, would wait adjacent to the taxi rank. Such passengers were identified and excluded from passengers deemed to be waiting for hackney carriages to arrive and be hired from the rank.

Rayne Road, Braintree

The rank at Rayne Road was never used for hackney carriages to wait for hires. Occasionally the rank was used by hackney carriage drivers to park their hackney carriage on the rank and then leave the vehicle unattended.

Pre-booked hires were fulfilled occasionally from the rank, by hackney carriages.

Manor Street, Braintree

The rank on Manor Street was used to varying extents from early morning, through the day until late at night. The level of provision of waiting hackney carriages varied from up to 10 vehicles waiting on the rank at times, to no vehicles waiting on the rank for extended periods.

Around 22% of hackney carriages left the rank empty. Passenger waiting occurred at all times of day from time to time. At times, lengthy queues of taxis waiting on the rank could be cleared within a few minutes through hires from arriving passengers, leaving passengers arriving a few minutes later, to wait for hackney carriages to arrive at the rank. On other occasions, one or two hackney carriages were seen waiting for extended periods (say more than 30 minutes) then they vehicles were hired by arriving passengers. Subsequent passengers who arrived a few minutes later would then have to wait for the hackney carriages to return to the rank, from the hires that they had just picked up.

Some hires fulfilled at the rank were clearly pre-booked. Some people would wait at the rank, whilst hackney carriages were also waiting at the rank, in order to be picked up by a specific arriving hackney carriage.

It was not uncommon for passengers to choose a hackney carriage waiting at the rank, which was not at the front of the rank. Occasionally, this was in order to choose a specific vehicle type, such as a wheelchair user choosing to use a wheelchair accessible vehicle, rather than a saloon car hackney carriage. However, on most occasions when a hackney carriage not at the front of the rank was chosen, the type of vehicle did not appear to influence the decision.

Albert Road, Witham (Station)

Albert Road is a one way road. At times of peak demand, the rank was, at times, fully occupied by waiting hackney carriages. Two way radios are used by many of the drivers working from this rank, to let other drivers know if there is space on the rank. When the rank is full, other hackney carriages wait in the car park on White Horse Lane, close to the entrance to Albert Road. The car park on White Horse Lane was not observed as part of the rank survey.

There were occasions when a train arrived at Witham Station and passengers hired all of the hackney carriages waiting on the rank. Occasionally, even if the rank was full of waiting hackney carriages, the arriving passengers would hire all of the waiting hackney carriages, leaving other passengers waiting at the rank for more hackney carriages to arrive. On some of these occasions, several additional hackney carriages would arrive within a minute or so. On these occasions, it was assumed that the arriving hackney carriages had arrived from the car park on White Horse Lane. As, in such an event, there were in fact waiting hackney carriages available, passenger waiting was not included in the observed data.

Passengers arriving by train at Witham Station were picked up by a variety of vehicles, including private cars, vans, private hire vehicles and pre-booked hackney carriages, as well as by hackney carriages hired from the rank. It was not uncommon to observe crowds of over twenty people waiting outside the station after a train had arrived. People waited directly outside the station entrance and at the taxi rank. It was not uncommon for people waiting at the taxi rank, to be waiting for private cars or pre-booked licensed vehicles to pick them up.

At times, several runs of the rank observation video footage were necessary to separate those people waiting for hackney carriages to arrive at the rank from people waiting for other modes of transport.

3.5 Hackney carriages working from ranks profile

During the ranks surveys, the time taken for a hackney carriage to return to the rank, having picked up a fare, was recorded for a sample of hackney carriages. This information provides an estimate for the time hackney carriages spend on rank based hires. When this information

is coupled with the vehicle queue lengths at the ranks, we can estimate how many hackney carriages are working from the ranks at any given time, (i.e. those waiting on the ranks and those which are engaged on hires and returning to the ranks.)

Based on a hackney carriage fleet size of 82, the following graph indicates our estimate of the profile of the proportion of the fleet which is engaged on rank based hires during each hour.

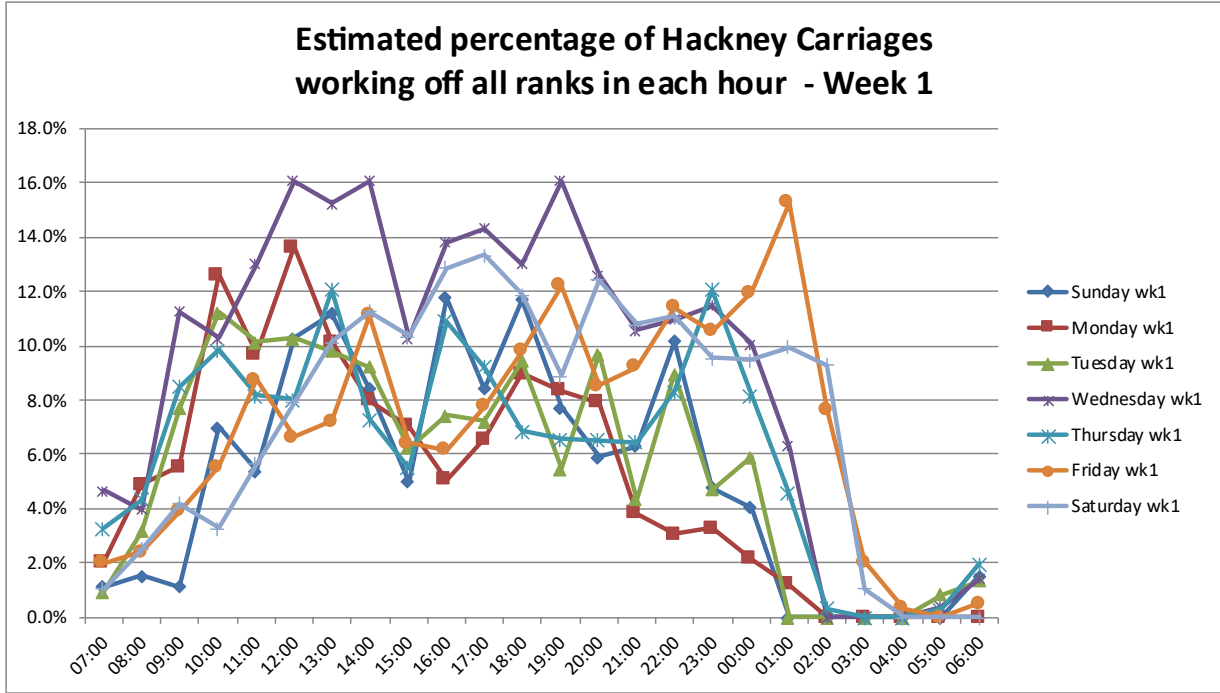


Figure 18 - Proportion of hackney carriages working off ranks – Week 1

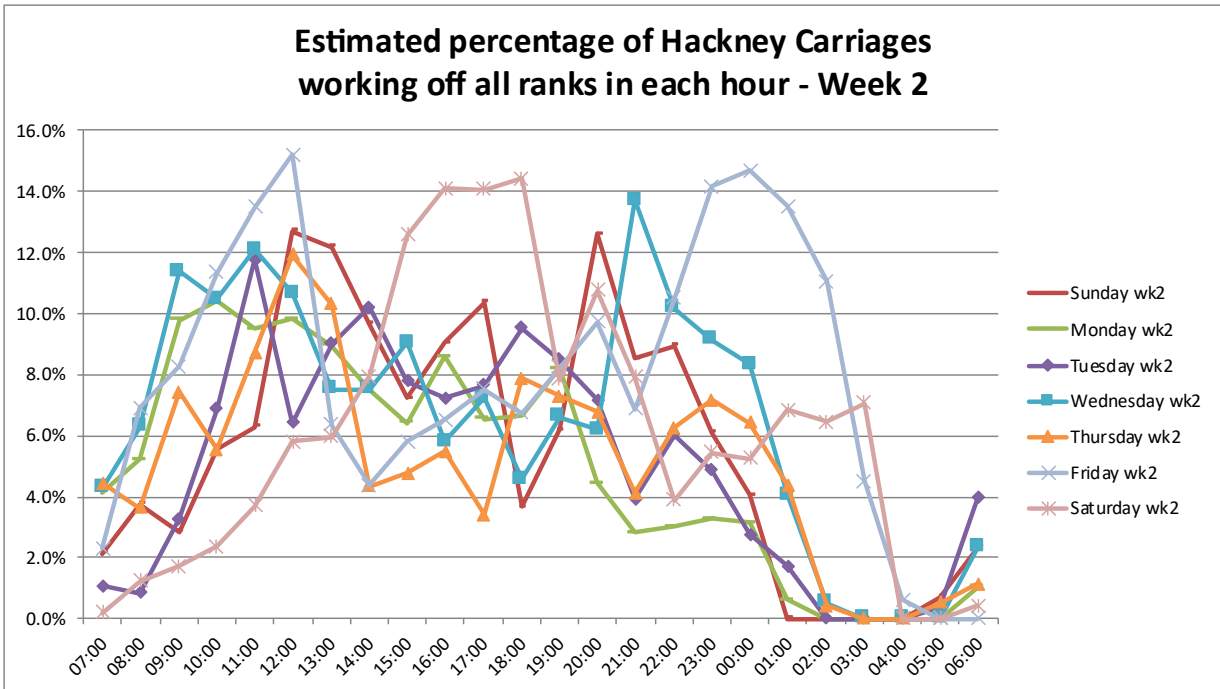


Figure 19 - Proportion of hackney carriages working off ranks – Week 2

Normally one would expect to see between 25% and 60% of the fleet in operation (depending on time of day and day of the week).

A range of factors can influence availability and the proportion of the fleet working from the ranks at particular times. The ratio of drivers to vehicles is an influencing factor. Fleets with high proportions of multi-driver working of vehicles generates higher levels of provision, than when a high proportion of the fleet is operated by single drivers per vehicle or significant part time operation is a feature.

Where hackney carriages undertake a significant proportion of their work as pre-booked hires, this has a clear influence on how much of the supply of such hackney carriages is available at taxi ranks. For example, if we consider two hackney carriages which are engaged for 50% of each shift on pre-booked hires and the remainder of each shift is spent working from the ranks. These two hackney carriages would provide the same level of rank based provision as a single hackney carriage working the same shift pattern, solely from the taxi ranks.

The graphs in Figure 18 & Figure 19 reflect the proportion of the fleet as the equivalent of full time working from the ranks. Some hackney carriages undertake both pre-booked hires and rank based hires. A hackney carriage working in this way would be assessed as less than a proportion of a hackney carriage working from the rank.

The peak proportion of the fleet in effective operation from the ranks was around 16%. This doesn't necessarily mean that only 16% of the fleet were working at this time, however, it reflects the possibility that some of the working hackney carriages may have been engaged in fulfilling pre-booked hires as opposed to working from the ranks.

4 GENERAL PUBLIC VIEWS

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

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

An online survey was developed and links to the survey distributed by website and social media. A total of 211 responses were received.

4.1 Braintree Public Attitude survey results

When analysing the results obtained from the survey data, we need to consider factors which may influence the results of the survey. Online surveys are often used by people who have particular issues to raise with respect to the subject under consultation. Whereas, people with no strong views or who have not experienced any problems or particular benefits, are less likely to participate. Consequently, issues identified may be over represented.

The results from the online survey are presented in the following table.

4.2 Table 1 – Public consultation survey results

Question	Response	Respondents
In the last three months, have you made one or more trips by taxi or private hire vehicle in Braintree District?	Yes	76%
	No	24%
For your most recent trip by licensed vehicle, what kind of licensed vehicle did you use?	Private Hire Vehicle	49%
	Hackney Carriage	32%
	Don't recall	19%
How do you normally obtain a hackney carriage within this area?	At a taxi rank	37%
	Book by telephoning a company	36%

Question	Response	Respondents
	Book online or via a mobile app	8%
	By phone as no rank available	1%
	Call one or hail one	1%
	Hail a passing cab in the street	2%
	I don't normally use Hackney Carriages	13%
	Using a freephone	2%
Respondents were asked to identify valid means of hiring a private hire vehicle. This question was asked to check the level of understanding of the differences between how private hire and hackney carriage vehicles may operate..	Identified only correct means of hiring a private hire vehicle	75%
	Identified one or more incorrect means, or didn't know.	25%
For what reasons have you used hackney carriages or private hire vehicles in the Braintree area? (please list all reasons in the last 3 months)	Medical	14%
	Personal business	0%
	Leisure	69%
	Work	34%
	Education	0%
	Shopping	22%
What was the approximate time of day of your last licensed vehicle trip?	Morning	23%
	Afternoon	22%
	Evening	29%
	Night	14%
	Don't recall / not applicable	12%
Regarding your last trip in a licensed vehicle, could you rate the following aspects of the trip with a rating of 1 to 5? (1 being poor and 5 being very good)	Aspect	Average rating
	Cleanliness of interior	3.95
	Cleanliness of exterior	3.92
	General condition	3.93
	Driver helpfulness	3.86
	Driver appearance	3.75

Regarding your last taxi trip, could you tell us how much was the fare paid? Please choose the price range most applicable.	Up to £5.00	3%
	£5.01 to £10.00	37%
	£10.01 to £15.00	12%
	£15.01 to £20.00	17%
	£20.01 to £25.00	10%
	£25.01 to £30.00	8%
	£30.01 to £40.00	5%
	£40.01 to £50.00	3%
	Over £50	5%
Regarding the number of hackney carriages in Braintree, do you feel there are:	Not enough	51%
	About the right number	15%
	Too many	9%
	No opinion/ Don't know	25%

<p>What improvements (if any) would you like to see to hackney carriages services in Braintree?</p>	<p>Responses included the following representative statements:</p> <ul style="list-style-type: none"> • A phone number as you cannot get a private cab sometimes • All have card machines • Although I live in Kelvedon - and with a walking difficulty - I normally choose to travel to London by train from Witham, as opposed to my local station. The reason is that there are no taxis at Kelvedon station any more. • An app to hire them like Freenow but one that actually works. We don't have Uber either which are so much cheaper and much more affordable for suburban households • App booking like Uber • Available more generally • Better quality rank and more vehicles • Better service at Witham in evenings • Bring the cost of the fares down as they are too high in comparison to Uber • Cheaper fares disabled friendly • Don't always except card have been kicked out for not having cash • Drivers that speak the English language. Take credit card payments instead of telling you cash only. Drivers that actually know where they are going instead of putting everything into a sat nav • Enable taxis to drop off and pick up in Bank Street. • Few cabs available outside Braintree town centre. Cabs rarely available in other towns and villages. • Focus on advanced driver training • Have a taxi rank at Kelvedon station • Having more at taxi rank in Manor Street especially on Sundays • Having proper stands. Locations near to taxi offices get overrun and littered with taxis, decamped and parked wherever they want, causing issues for local residents. • I don't use them as it's easier to get a private hire vehicle. Perhaps more taxis on the Halstead rank would be better. • I live in a rural village in the Braintree District - we do not have a service to rely on • I wish there were more taxis available at Braintree station after dark, this would be helpful. At the moment, whenever I arrive after dark at Braintree Station, I'll have to phone for a taxi & this may take quite some time to arrive. It's bad enough being a man who's retired but single females are at greater risk of crime etc etc etc.
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	<ul style="list-style-type: none"> • I would like some of the cabs on the taxi rank to be cleaner. • I would like to see more taxis meeting rail services at Braintree station - it's a gamble at the moment and you can't rely on any being there especially in the evening. • I would like to see their cars checked more regularly for repairs and more use of the taxi ranks at the train stations. • I would like to see some more availability in Kelvedon – it's really hard to get a cab in the village and when you do - you pay a lot for a short ride • Inform upfront of cost of journey; prices too high • It is practically impossible to get a reasonably priced taxi service in rural villages. The cost to get the taxi to my home and then on to my destination is prohibitive. Rural areas suffer from the availability and willingness of cabs to provide a service outside of the main towns. • Limit on number parked in side streets around station • Make taxis meet the incoming trains at Braintree station, especially at night. There are very rarely cabs at the rank • More availability and too expensive from Braintree town to Wethersfield and the Bardfields Finchingfield especially when women need to get home. • More availability at peak times, e.g. the school run • More availability especially at weekends • More availability for the company I like to use because they do pensioners discount. • More availability outside 9-5 • More availability. Almost impossible to get a cab after 11pm • More availability/drivers • More available at train stations during the evening/night. It can sometimes be a long wait, in a dark street whilst waiting for a taxi. • More available to meet London trains at Braintree station in the evening • More in Halstead • More larger vehicles • More ranks • More ride share options for peak times • More taxis in the Halstead area • More taxis please • More taxis. Reducing the double rate charge on Sunday. Ensuring prices are competitive amongst firms • More vehicles and more availability • More vehicles as not been able to get a taxi the last 4 times I have asked for one • More wheelchair accessible vehicles are a must with 24/7 availability
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	<ul style="list-style-type: none"> • More wheelchair ones. My late brother could not often get a taxi. There are only 3 of them in Braintree • More wheelchair taxis • Not operating as a private hire when it suits them. If you get sent a Hackney carriage they should use the meter not make up the fare • Not parking in residential parking spaces and blocking the roads with the way they park and leave their cars • Parking them overnight in locked parking areas, not at the drivers home • Politer drivers, more care with vehicle appearance • Reduce the price, they are extortionate considering the lack of alternatives in the evening and at weekends when there are no alternatives • Remove most of them to let private hire firms flourish • smarter drivers attire and clean pleasant smelling cabs • Stop the use of cannabis smoking by the drivers! • Taxi rank at night awful having to walk home in dark ss no taxis. Ring taxi cabs and all busy. Disgusting • Taxis available at train station taxi ranks • That all cars used by taxi /hackney carriages are upto standard .. and not substandard • There are never any taxis or only one at the rank of an evening when the train gets into braintree from london (10.50/11.45/12.40) I can never get one it is frustrating • There aren't enough wheelchair accessible. One company does not take wheelchair users after 5pm. As a customer you are often hampered by school contracts. It's extremely difficult to be spontaneous. You always have to be flexible.." • There needs to be more taxis at the rank in at night-time. • They all seem to drive really recklessly and are very dangerous on the road. They all need to be reminded that they are not a priority and should take mandatory retesting every few years. All of Braintrees taxis are dangerous drivers. • To not charge too much • To see more taxis the ones that don't disappear near school time • We have a taxi rank at Kelvedon, I've never seen one. I have to get one from Witham adding money into the fare. • Wheelchair accessible vehicles, disability awareness etc
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Have you experienced any problems with the local hackney carriage service? (indicate as many as apply)	Design of vehicle	2%
	Driver issues	9%
	Position of ranks	9%
	Delay in getting a taxi / lack of availability	38%
	Cost	2%
	Poor driving / speeding	2%
	Cleanliness	10%
	No problems experienced	42%

If you have had any problems with the local hackney carriage service, please tell us more, perhaps providing an example with a time and place where a problem occurred.

Responses included the following representative statements:

- Absence of taxis at Witham in the evenings
- Braintree rank on manor Street - driver and vehicle smelt of cannabis - I got in another in the end
- Braintree rank rude wouldn't take card told me to go to Tesco's. Even though he had a card reader next to him
- Card machines can be temperamental
- Couldn't get what I wanted from home to catch a 9 am train. Couldn't get one coming home late at night either, had to use a more expensive one
- Didn't want to take me on a local trip
- Driver competence is generally poor.
- Driver seemed quite dodgy , made me feel uneasy
- Following a hospital visit, we were unable to get a WAV for the return journey, phoned >25 companies in the area and beyond but none had a WAV on the road.
- Friday nights, each week, regardless of what driver we get, they speed down Lakes Road and Crossing road no thought for the fact that it's dark, people could be crossing the road around the bend.
- Getting taxi from Gosfield lakes
- I generally now book a private taxi to ensure I can get a wheelchair taxi when I need one.
- I live in Albert road, and since the station has become more busy the drivers have taken to parking up in the resident parking spaces, and talking loudly late at night.
- Inconsiderate parking
- Lack of immediate taxi service outside the station
- Locations near to taxi offices get overrun and littered with taxis, decamped and parked wherever they want, causing issues for local residents. Specifically within Scotfield Mews, Witham where I reside.
- Long wait after train arrival to Braintree late in the evening.
- Need to get one. Dangerous at night with no taxi's at rank
- No taxis available for Hours ..
- No taxis available to book. Yet no taxis at the rank night time.
- Not enough working in evenings (4-7pm)and Sundays

	<ul style="list-style-type: none"> • Not turning up after making booking 30 mins earlier. • On the 12th of June I missed my train because my taxi was 1/2 an hour late. • Only accepting cash • Overall the availability can be poor at peak times. eg mid morning and mind afternoons for shopping trips. • Rude and over charged • Some of them could not bother to help you in a taxi if it is too high. I difficulty some times. • Station no taxi. • Taxi drivers are dangerous drivers. • Taxi was waiting in wrong location • The hygiene of one driver is particularly unpleasant. His size means his chair is pushed back into the passenger seat behind him which in turn leaves less leg room. Unfortunately there is an unpleasant smell in the car every time we used his car. He doesn't get out of the car to help with bags etc like other drivers do. He's a nice enough person though. • There are no cabs at the station from 8 onwards • Too expensive so have to walk or get the bus and even the buses are expensive. Both of us work full time... We can't afford private taxi unless ABSOLUTELY necessary. • Waiting for a taxi 18/07/2023 - no cab available for 45 mins and it's 21:00. It's only a 3 mile journey and it is usually charged in excess of £20. It's not value for money • Waking me and my Wife up in the middle of the night • We are frequently unable to get a cab at both Braintree and Witham stations at various times of the day • Wheelchair access and ramp angle • Witham station 3 cabs for 20 plus people per train • Witham station. Waiting late at night for a taxi 		
What would encourage you to use hackney carriages or use them more often (top two reasons)		1 st choice	2 nd choice
	Better drivers	12%	6%
	Better located ranks	7%	12%
	Better vehicles	10%	6%
	More Hackney Carriages I could hail or get at a rank	16%	21%
	More Hackney Carriages I could phone for	31%	29%
	More Hackney Carriages that I could hire through a mobile app	24%	26%

Do you consider you, or anyone you know, to have a disability that means you need an adapted vehicle? (Not necessarily a licensed vehicle)	No	69%		
	Yes – I need a wheelchair accessible vehicle	5%		
	Yes – Someone I know needs a wheelchair accessible vehicle	14%		
	Yes –I need an adapted vehicle but not a wheelchair accessible vehicle	7%		
	Yes – Someone I know needs an adapted vehicle but not a wheelchair accessible vehicle	5%		
Are there any locations where you would like to see new taxi ranks?	Yes	33%		
	No	24%		
	Don't know / no opinion	43%		
If you would like to see new taxi ranks, where would these ranks be?	Responses included the following representative statements, in descending order of frequency. <ul style="list-style-type: none"> • Halstead • Hatfield Peverel Station • Kelvedon Station • Freeport Station • Witham Town Centre • Rural areas of Braintree • Around Football and Rugby club for match days 			
How would you rate the level of service provided by hackney carriages in Braintree? Please rate from 1 to 5. (1 being very poor and 5 being very good)	The average rating value was 3.1			
Please choose which of the following features would do most to improve ranks in Braintree District? (Please choose up to three, in order of preference)		1 st choice	2 nd choice	3 rd choice
	Seating	15%	17%	17%
	Lighting	7%	23%	22%
	Shelter	33%	25%	11%
	Signage	15%	8%	16%
	Don't know / no opinion	30%	27%	35%

<p>In the past three months have you wanted to take a hackney carriage (taxi) from a taxi rank in Braintree and:</p> <ul style="list-style-type: none"> Given up or made alternative arrangements for travel; and/or You didn't expect any to be available when you needed so you didn't try. 	Yes	26.5%
	<p>Note: 46% of respondents indicated yes. However, those which indicated valid rank locations where they had given up or not tried to hire a hackney carriage was 26.5%. The value of 26.5% is used as the indicator of latent unmet demand.</p>	
<p>Please tell us when you gave up and made alternative arrangements?</p>	Weekday daytime (7.00 to 18.00)	27%
	Weekday evening (18.00 to 22.00)	26%
	Weekday night (22.00 to 7.00)	15%
	Friday or Saturday daytime (7.00 to 18.00)	4%
	Friday or Saturday evening (18.00 to 22.00)	6%
	Friday or Saturday night (22.00 to 7.00)	20%
	Sunday daytime or evening (7.00 to 22.00)	1%
	Sunday night (22.00 to 7.00)	1%
<p>How long was the time that you waited?</p>	Up to 10 minutes	13%
	10 to 20 minutes	27%
	20 to 30 minutes	37%
	30 to 60 minutes	19%
	60 to 90 minutes	1%
	More than 90 minutes	3%
	I knew that it was unlikely any taxis would be available, so I didn't even bother trying the rank	0%
<p>Have you wanted to hire a hackney carriage by flagging down (immediately hiring the vehicle in the street without prebooking or being at a rank), in the last three months, and:</p> <ul style="list-style-type: none"> Given up or made alternative arrangements for travel; and/or You didn't expect any to be available when you needed so you didn't try. 	Yes	18%
	No	82%

Thinking back to before the pandemic do you think that your use of Braintree licensed vehicles is different now to then?	No difference	59%
	I use licensed vehicles less now, compared with prior to Covid-19	24%
	I use licensed vehicles more now, compared with prior to Covid-19	17%
<p>Reasons given for increased use included the following, in decreasing order of frequency:</p> <ul style="list-style-type: none"> • Increased • Due to illness can no longer drive <p>Reasons given for reduced use included the following, in decreasing order of frequency:</p> <ul style="list-style-type: none"> • Because they're not readily available • Don't trust the drivers hygiene • Everything, including taxi fares, has gone up in price therefore I think twice before using taxis. • Not as many vehicles. • Use less because I moved 		
Would you support Braintree Council introducing (before 2030) stricter low emission standards for hackney carriages and Private Hire Vehicles, to allow ONLY low emission vehicles, in line with these policies?	Yes and I would pay up to 20% more in fares to select that kind of vehicle	4%
	Yes, but I would not pay any more for that kind of vehicle	12%
	Yes, if there is financial support for the investment	10%
	Yes for use in specified lower emission zones like in London and Watford	0%
	No – drivers should be able to choose their vehicles regardless of the impact on the environment and air quality	11%
	No opinion	63%

How could lower emission hackney carriages and Private Hire Vehicles change your travelling behaviour: (choose as many as relevant)	I would use my car less, and use a lower emission taxi more often instead in the daytime	3%		
	I would consider owning one fewer car than I currently do	1%		
	The improved air quality would encourage me to cycle or walk more	2%		
	The improved air quality around ranks would encourage me to use a hackney carriage more often	3%		
	Riding in these kinds of cars would encourage me to purchase a lower emission vehicle myself	1%		
	No change to my driving or riding behaviour	21%		
	No opinion	69%		
What are the top three benefits (in your opinion) for moving to a lower emission vehicle? (choose 3)	Benefit	First Choice	Second Choice	Third Choice
	Better air quality for wider community	56%	35%	8%
	Better air quality (in the vehicle) for drivers and passengers	21%	33%	11%
	Applying a whole life cost (WLC) analysis often shows that best in class vehicles are cheaper to operate than conventional and older technology vehicles	13%	8%	37%
	Customer demand (customers preferentially select or request low emission vehicles)	0%	2%	13%
	Eligibility for existing grants that offer financial support for the adoption of ULEVs as taxis	6%	13%	5%
	Reduced impact on climate change (lower carbon dioxide equivalent emissions)	5%	8%	26%
	Do you have regular access to a car (whether owned or borrowed) or another form of motorised transport?	Yes	81%	
No		19%		
Are you a student?	Yes	1%		
	No	99%		

Are you a permanent resident in Braintree?	Yes	96%
	No	4%
What gender are you?	Male	53%
	Female	41%
	Non Binary	1%
	Prefer not to say	5%
Which of the following age groups do you fall into?	16 – 30 Years old	6%
	31 – 55 years old	36%
	Over 55 years old	56%
	Prefer not to say	2%

Thank you for your patience and cooperation completing this survey. Are there any other comments that you would like to make?

Responses included the following comments:

- There is not sufficient emphasis, guidance or incentives on sharing taxis.
- Impossible to get taxi my friend has walked home many times in dark as she can't drive. Buses all finish early. Puts me off going into town at night
- More coverage outside of Braintree Town Centre
- Compared to where I came from in Lincolnshire, I've been here 23 years. I think the private hire companies and driver operators are very good/excellent.
- I do not feel safe because of how long the waits are for a taxi if any kind in Braintree
- Availability of WAV in the district is woefully low with no apparent roster of duty companies. Familiar excuse for not having a WAV available is no driver or off road (for months!)
- I would like more if not all cabs to be wheelchair friendly (like in Norwich) and like I say a Taxi Rank in Rayne road.
- Better to extend the Digit electric bus service across the whole BDC area
- Shortage of private hire cars apparently due to lack of drivers
- Hapicabs need to stop operating in the area. Rude, over charge, pick up wherever they want to.
- Drivers not happy with short journey for older people. Some don't turn up! Today short journey different charges £7 outward £5 return same very short journey!
- The frustration of everyone going on about emissions when so many cars on the road have been proven to have cheated the test so low emission zones are a con until this is rectified by vehicle manufacturers and government need to ask how many vehicles actually meet the requirements
- Knights taxi service completely parking and leaving their vehicles in inconsiderate manners, blocking roads, parking on pavements and double yellows and blocking access to a no entry. Leaves no spaces for local residents to park
- Mileage charge. I was charged £7 for less than 1 mile.
- Although its possible to get to Braintree and Chelmsford by bus here is no bus service that enables access to Stansted Airport from Great Bardfield therefore a taxi is necessary and very costly. The Village Link bus service which goes via Thaxted 4 miles away goes directly to the airport!"
- In the main I use taxis to shop with a friend. Where possible we try to book Community Transport (an excellent service). The real problems is ensuring you can get transport for health appointment at major hospitals/clinics remote from Braintree/Halstead. I have had appointments at the following: in Colchester, Chelmsford/Broomfield, Ipswich, Bury St Edmonds, Sudbury.
- Braintree District covers a large rural area. Taxi ranks and services are focused on the towns and I think this survey is too. Though I would rather not do so, I have to

use my own car due to lack of public transport services and availability/affordability of taxi services.

- The town badly needs more taxis. There are not enough and current fares are too expensive.

Pre-booking of licensed vehicles was the most popular method employed.

Frustration regarding availability of hackney carriages, especially at night, was a common issue identified.

Some respondents commented on lack of availability of wheelchair accessible licensed vehicles.

5 KEY STAKEHOLDER CONSULTATION

5.1 Overview

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

- Braintree District Councillors
- Town and Parish councils within Braintree
- Braintree Street Ambassadors
- Supermarkets
- Hotels
- Pubwatch / individual pubs / night clubs
- Other entertainment venues
- Restaurants
- Hospitals
- Police
- Disability representatives
- Rail operators
- Bus operators
- Other council contacts within all relevant local councils
- Chamber of commerce / Bid / Local business groups

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

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

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

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

5.2 Responses

Supermarkets

Most of the non-town centre supermarkets contacted indicated that they were not aware of any issues with availability of licensed vehicles. Staff at the Tesco in Braintree town centre were aware that customers often used the taxi rank on Manor Street and they regularly collected supermarket trolleys from the taxi rank. Some customers waited for extended periods of time for taxis to arrive. Other supermarket staff generally felt that customers made their own arrangements for booking licensed vehicles.

Some respondents at information desks, in supermarkets, were aware of limited availability at night, through personal experience, but didn't feel that supermarket customers were affected during normal shopping hours. It was rare for supermarket staff to be involved with booking licensed vehicles for customers.

Hotels

Most of the hotels contacted felt that there was any particular issue with availability of licensed vehicles during the daytime. Most customers make their own arrangements for a licensed vehicle if required. There can occasionally be some delay in availability in the mornings during 'school run times'. In Braintree, staff at the Travelodge were aware that the taxi rank nearby on Manor Street generally had taxis available. Occasionally there may be a wait for a taxi to come to the rank, if none were waiting.

Pubs and clubs

Opinions of licensed premises representatives varied. Some had no particular awareness of availability. Customers made their own arrangements and availability wasn't a common topic which arose. However, others indicated that they were aware that late at night, the wait times for a licensed vehicle can be longer. Within Braintree town, it was remarked that the level of availability of taxis at the rank on Manor Street was poor during the afternoons and at night.

Restaurants

Restaurants contacted rarely ordered a licensed vehicle for customers. If required, customers often made their own arrangements. No consultees were aware of any issues.

Hospitals

Braintree Community Hospital indicated that poor availability of licensed vehicles is a persistent issue at all times of day. The hospital commonly books licensed vehicles for transporting patients home.

Many of the trips from the hospital are relatively short distance trips. However, patients often cannot walk long distances. The reception / administration desk in the hospital hold a list of local booking offices that they call to book travel. Often, companies contacted stated that they didn't have any vehicles available for several hours. It was suspected by hospital staff

that as many of the journeys were of short distance, this was a factor which dissuaded companies from taking the bookings.

Police

Local police were contacted with respect to any feedback they may have regarding availability of hackney carriages and proposals for a new taxi rank in Witham town centre (Newland Street had been suggested as a potential location). The response from the Police incorporated the following statement:

‘The main taxi rank that we have concerns over is the one outside Witham Train Station. This often has long queues on Friday and Saturday nights and often people share taxis to avoid waiting. This is concerning for us as this puts people in possible danger as well the possibility that intoxicated people could be exploited.

This taxi rank is some walk from the town centre and as such people are walking in the dark in poorly lit streets to access the taxi rank, which does not have sufficient taxis.

A taxi rank in Newland street will improve access for those using the town centre and should hopefully reduce the number of persons requiring a taxi from the train station, such as commuters. Having a rank in the town centre, could however encourage more crime and ASB [Anti Social Behaviour] and so it would need to be very well lit and ideally have CCTV (most of the town centre has good coverage.)’

Disability and minority interests

Disability and minority groups were contacted, including those representing interests of elderly, visually impaired, mobility impaired and with learning difficulties. Responses were very limited. However, the limited feedback received indicated that regular suppliers of licensed vehicles were generally used. Virtually all travel would be likely to be pre-booked.

There was a feeling that the ability of the regular suppliers of licensed vehicle services, to provide a licensed vehicle when required, had reduced in the last few years. Whilst Covid-19 appeared to have significantly influenced the number of drivers and vehicles available after Covid-19 mitigation measures had been relaxed, the reduction in availability appeared to have started prior to the arrival of Covid-19.

When regular suppliers are able to fulfil bookings, they generally understand the particular needs of individual regular travellers. However, when a new supplier has to be found, it can take a while until the drivers understand the needs of the passengers and passengers get used to the new drivers.

The ability to use a familiar licensed vehicle driver can be a source of comfort for some passengers.

Rail and other transport operators

No feedback was provided by rail operator representatives. No feedback was received from bus operators.

District Councillors, Parish & Town Councils

One councillor provided feedback indicating that they had seen feedback on local social media recommending some local licensed vehicle services and commenting that they were reliable.

A Parish Council and Town Council responded with comments.

In rural areas the following observations were made:

- In rural parishes car ownership is essential and most properties have at least two vehicles in village centres where there is little off road parking, plus the cost of keeping and maintaining a car. Perhaps with reliable access to licensed vehicle services, at least one car could be relinquished.
- Some rural areas have poor public transport links.
- Cuts in public transport services have led to the need to use alternative services such as DART or increased use of pre-booked licensed vehicles.
- The benefits associated with DART are limited and don't meet the full range of needs for individuals.
- Availability of licensed vehicles can be limited at times.
- Licensed vehicle services, as an alternative to conventional bus services or DART, offer greater flexibility and better meet individual needs, but are significantly more expensive.
- The additional expense of using licensed vehicles is an obstacle to some potential users, which limits their ability to travel.
- Availability of licensed vehicles is on occasions unreliable. This can lead to issues such as missing medical appointments.

Witham Town Council provided some feedback regarding a proposal which has been raised, to implement an new taxi rank in Witham town centre. It was felt that a rank in a suitable location would be well used during the daytime and in the evenings and save people having to walk the not inconsiderable distance to the Railway Station rank, when licensed vehicles were not available to be booked by phone.

The Town Council were asked to provide recommendation(s) for the location of a new rank which would fulfil as many of the following criteria as possible:

- Located close to night time economy venues
- Located close to daytime demand generators such as shops.
- A location which is easily accessed by passing hackney carriages, i.e. avoiding dead end streets or locations which require a significant diversion from main routes.
- A location which would normally be passed by hackney carriages returning to other nearby ranks (i.e. Witham railway station).
- A location which could be converted to a taxi rank with minimum investment. For example new road markings on existing short term roadside parking spaces.
- A location which would not disrupt traffic when taxis join or leave the rank.

A rank located on Newland Street was identified as a suitable location, which meets the criteria listed.

6 TRADE STAKEHOLDER VIEWS

The BPG encourages all studies to include 'all those involved in the trade'. An online survey was created and the link to the survey distributed to members of the licensed vehicle trades in Braintree.

A workshop session was held and members of the trade were invited to attend.

Booking office operators were also contacted for their views on the trade and to obtain information on how rank based hires relate to pre-booked hires of both hackney carriages and private hire vehicles.

Drivers waiting at the ranks were also approached for their comments.

6.1 Online survey results

Members of the licensed vehicle trades were asked a series of questions. The responses to these questions are summarised in this section.

A total of 44 responses were received.

30% of respondents indicated that they normally drove a hackney carriage. A further 11% indicated that they normally drove both hackney carriage and private hire vehicles. 57% of respondents indicated that they normally drove a private hire car and 2% didn't normally drive.

35% of respondents indicated that they were licensed vehicle owners.

28% of respondents indicated that their vehicles were driven by more than one driver.

Respondents were asked how long they had been involved in the licensed vehicle trade in Braintree.

0 - 2 years	60.5%
3 - 5 years	4.7%
6 - 10 years	16.3%
11 - 15 years	7.0%
16 - 20 years	2.3%
Over 20 years	9.3%

Do you normally subscribe to a booking system for bookings, or obtain bookings through a booking office?

	Yes	No
Yes, I normally drive a Hackney Carriage	33%	67%
Yes, I drive both types of vehicles	20%	80%
Yes, I normally drive a Private Hire Vehicle	56%	44%

Do you have personal clients who directly call you, text you or otherwise message you directly to hire your services? For example, using a phone number from cards distributed.

	Yes	No
Yes, I normally drive a Hackney Carriage	69%	31%
Yes, I drive both types of vehicles	80%	20%
Yes, I normally drive a Private Hire Vehicle	12%	88%

If applicable, what type of licensed vehicle do you drive most frequently?

	Saloon car	Purpose built taxi vehicle	Minibus / People carrier (wheelchair accessible)	Minibus / People carrier (not wheelchair accessible)
Yes, I normally drive a Hackney Carriage	62%	38%	0%	0%
Yes, I drive both types of vehicles	20%	20%	20%	40%
Yes, I normally drive a Private Hire Vehicle	36%	8%	24%	32%

Respondents were asked how many hours they operated each day. The responses varied from 4 hours per week to 74 hours per week.

Drivers were asked approximately how many journeys were undertaken during a typical week, which required the carriage of a wheelchair? All of respondents indicated none.

Drivers were asked approximately how many journeys on average each week they pick up from ranks.

	Yes, I normally drive a Hackney Carriage	Yes, I drive both types of vehicles
None	0%	20%
Up to 10 per week	0%	20%
11 to 20 per week	0%	40%
21 to 30 per week	18%	0%
31 to 40 per week	9%	0%
41 to 50 per week	27%	0%
51 to 60 per week	0%	0%
61 to 70 per week	18%	0%
71 to 80 per week	27%	20%
81 to 90 per week	0%	0%
91 to 100 per week	0%	0%
101 or more per week	0%	0%

Respondents were asked how many hires they pick up each week from hailing.

	Yes, I normally drive a Hackney Carriage	Yes, I drive both types of vehicles
None	50%	60%
Up to 10 per week	33%	40%
11 to 20 per week	8%	0%
21 to 30 per week	0%	0%
31 to 40 per week	8%	0%

Respondents were asked how many hires they pick up each week from pre-booked hires.

	Yes, I normally drive a Hackney Carriage	Yes, I drive both types of vehicles	Yes, I normally drive a Private Hire Vehicle
None	8%	0%	58%
Up to 10 per week	25%	0%	21%
11 to 20 per week	25%	20%	4%
21 to 30 per week	8%	20%	0%
31 to 40 per week	8%	20%	0%
41 to 50 per week	25%	20%	4%
51 to 60 per week	0%	0%	8%
61 to 70 per week	0%	0%	0%
71 to 80 per week	0%	0%	0%
81 to 90 per week	0%	20%	0%
91 to 100 per week	0%	0%	4%
101 or more per week	0%	0%	0%

Respondents were asked how many hires they pick up each week from regular contracts.

	Yes, I normally drive a Hackney Carriage	Yes, I drive both types of vehicles	Yes, I normally drive a Private Hire Vehicle
None	17%	20%	4%
Up to 10 per week	67%	40%	67%
11 to 20 per week	8%	0%	13%
21 to 30 per week	0%	20%	8%
31 to 40 per week	8%	20%	4%
41 to 50 per week	0%	0%	0%
51 to 60 per week	0%	0%	0%
61 to 70 per week	0%	0%	4%
71 to 80 per week	0%	0%	0%
81 to 90 per week	0%	0%	0%
91 to 100 per week	0%	0%	0%
101 or more per week	0%	0%	0%

Taking all of the responses into account, rank hires accounted for around 38% of all hackney carriage hires.

For 46% of hackney carriage respondents less than 50% of hires are derived from ranks. 15% of hackney carriage respondents indicated that none of the hires that they fulfil are derived from ranks.

When we compare the total hires per week with the hours worked per week, we would expect to see a relationship around a linear trend line.

Some of the responses received indicated a relatively low number of weekly hires in comparison with the number of hours worked each week. For example, one hackney carriage driver respondent indicated that they worked on average 74 hours per week and undertook up to 10 hires per week. These were contract hires. The respondent indicated that they undertook no rank based hires, no flag down hires and no pre-booked hires. It is possible that the work undertaken was solely regular contract hire work. Examples of hackney carriages undertaking only contract work have been encountered and verified, in other studies. Generally, the hackney carriages undertaking work in this way, undertake regular school contract hires or chauffeur services.

The number of hires has been plotted against hours, for each respondent, in the following figures. Some extreme outliers (those who apparently undertook no hires, or didn't indicate that they worked any hours) have been excluded from the charts.

Separate charts have been prepared for Hackney Carriage Drivers, Private Hire Drivers and those who drove both types of vehicles.

Each chart contains a trend line, which is the line of best fit between the scattered data points.

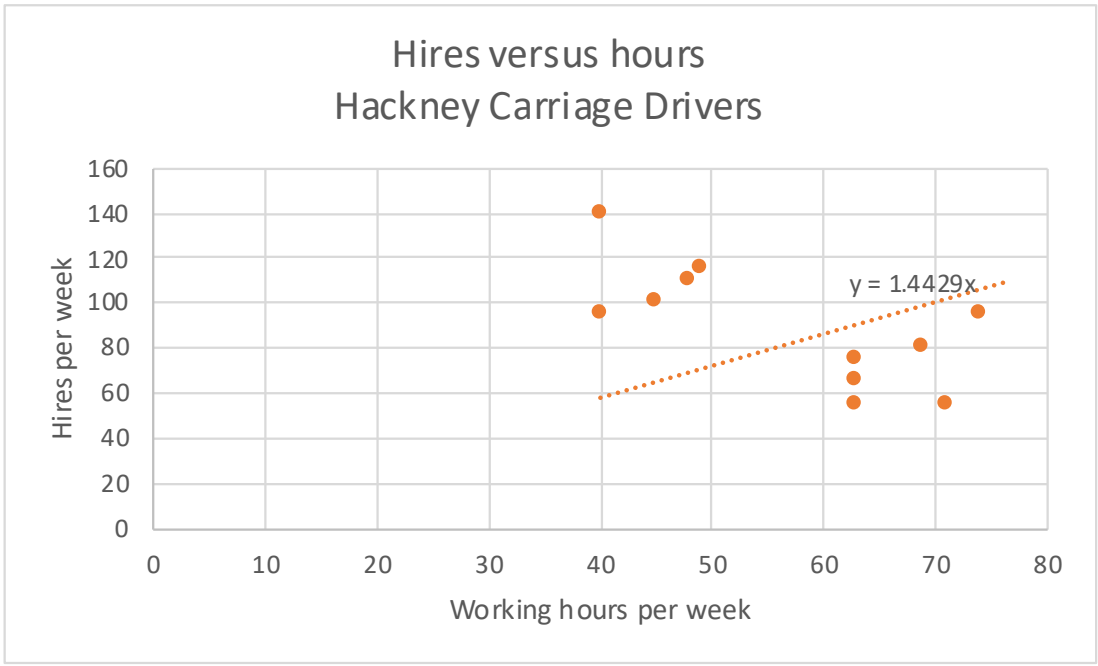


Figure 20 - Plot of hackney carriage driver hours against hires undertaken per week

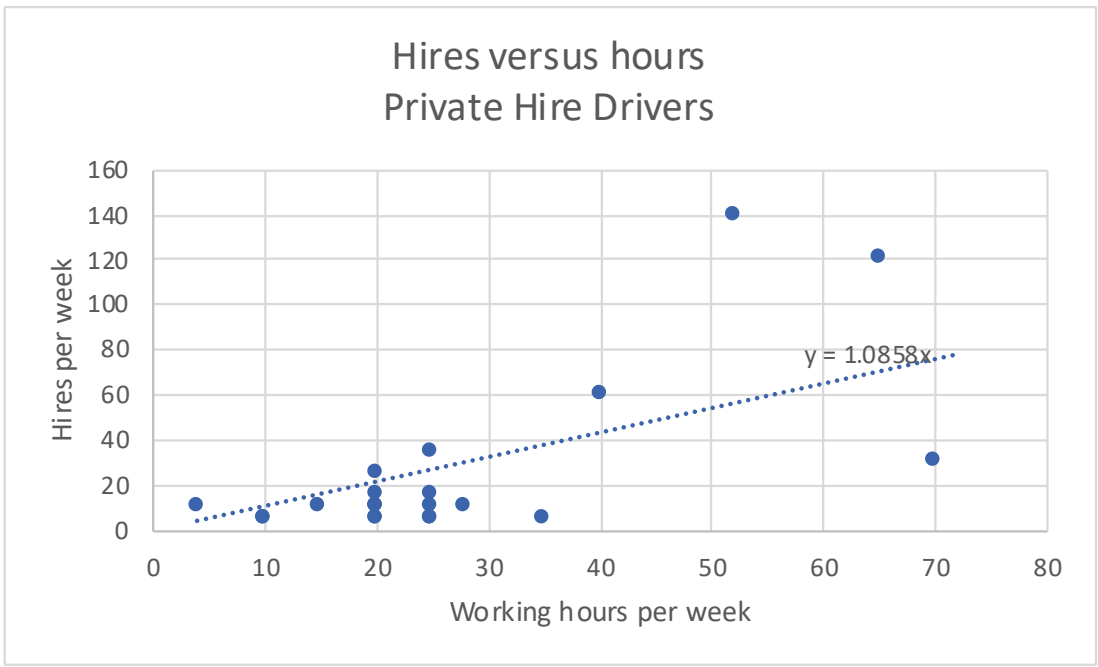


Figure 21 - Plot of private hire driver hours against hires undertaken per week

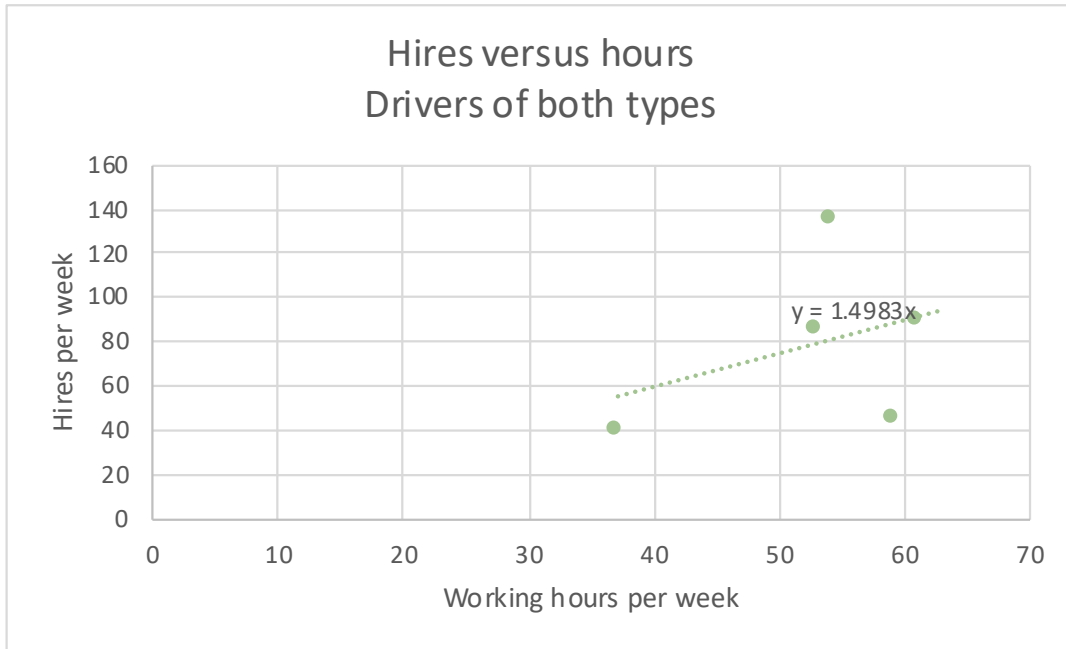


Figure 22 - Plot of drivers of both types of vehicle hours against hires undertaken per week

Respondents were asked if they undertook school contract work.

	Yes, I normally drive a Hackney Carriage	Yes, I drive both types of vehicles	Yes, I normally drive a Private Hire Vehicle
Yes	23%	0%	88%
No	77%	100%	12%

Those who indicated that they undertook school contract work were asked how many days per week they undertook school contract hires.

	Yes, I normally drive a Hackney Carriage	Yes, I drive both types of vehicles	Yes, I normally drive a Private Hire Vehicle
1 day per week	33%	0%	0%
2 day per week	0%	0%	0%
3 day per week	0%	0%	0%
4 day per week	0%	0%	0%
5 days per week	67%	0%	100%

Respondents were asked if there is sufficient rank space in Braintree District.

	Yes, I normally drive a Hackney Carriage	Yes, I drive both types of vehicles	Yes, I normally drive a Private Hire Vehicle
Yes	69%	60%	58%
No	31%	40%	42%

Do you think new ranks are required?

	Yes, I normally drive a Hackney Carriage	Yes, I drive both types of vehicles	Yes, I normally drive a Private Hire Vehicle
Yes	46%	60%	33%
No	54%	40%	67%

Locations suggested for new ranks included the following:

- Witham Town centre and more space on the Witham station (rank)
- Bank Street Braintree
- High Street Braintree

- Most busy public footfall areas

Are there any ranks in Braintree District which need more spaces?

	Yes, I normally drive a Hackney Carriage	Yes, I drive both types of vehicles	Yes, I normally drive a Private Hire Vehicle
Yes	54%	75%	27%
No	46%	25%	73%

When asked if any existing ranks need more spaces, responses included the following:

-
- Witham Station
- Braintree Station
- The one in front of Tesco in town [Manor Street].

Did you drive a Hackney Carriage or Private Hire Vehicle in Braintree District, prior to the spread of Covid - 19?

	Yes, I normally drive a Hackney Carriage	Yes, I drive both types of vehicles	Yes, I normally drive a Private Hire Vehicle
Yes	85%	80%	16%
No	15%	20%	84%

How does demand for hires now compare with the level of demand prior to the spread of Covid-19? [Daytime (06:00-18:00)]

	Yes, I normally drive a Hackney Carriage	Yes, I drive both types of vehicles	Yes, I normally drive a Private Hire Vehicle
There is more demand now	20%	0%	0%
Demand is similar now	30%	33%	50%
There is less demand now	50%	67%	50%

How does demand for hires now compare with the level of demand prior to the spread of Covid-19? [Night-time (18:00-06:00)]

	Yes, I normally drive a Hackney Carriage	Yes, I drive both types of vehicles	Yes, I normally drive a Private Hire Vehicle
There is more demand now	11%	0%	0%
Demand is similar now	44%	33%	67%
There is less demand now	44%	67%	33%

How to the hours that you work as a licensed vehicle driver now compare with the hours that you worked prior to the spread of Covid -19? Please choose the answer which is most relevant to your circumstances. [Daytime (06:00-18:00)]

	Yes, I normally drive a Hackney Carriage	Yes, I drive both types of vehicles	Yes, I normally drive a Private Hire Vehicle
I work more hours now	56%	67%	0%
I work the same or similar	44%	0%	100%
I work less hours now	0%	33%	0%

How to the hours that you work as a licensed vehicle driver now compare with the hours that you worked prior to the spread of Covid -19? Please choose the answer which is most relevant to your circumstances. [Night-time (18:00-06:00)]

	Yes, I normally drive a Hackney Carriage	Yes, I drive both types of vehicles	Yes, I normally drive a Private Hire Vehicle
I work more hours now	56%	25%	0%
I work the same or similar	33%	25%	100%
I work less hours now	11%	50%	0%

Prior to reading this questionnaire, were you aware that Braintree District Council has a policy to limit the number of Hackney carriage vehicle licences?

	Yes, I normally drive a Hackney Carriage	Yes, I drive both types of vehicles	Yes, I normally drive a Private Hire Vehicle
Yes	100%	100%	54%
No	0%	0%	46%

Are there sufficient Hackney Carriage in Braintree District to meet current levels of demand?

	Yes, I normally drive a Hackney Carriage	Yes, I drive both types of vehicles	Yes, I normally drive a Private Hire Vehicle
Yes	92%	60%	22%
No	8%	40%	78%

How many Hackney Carriages should there be in the fleet in Braintree District? There are currently 84.

Responses were received in the following ranges.

	Yes, I normally drive a Hackney Carriage	Yes, I drive both types of vehicles	Yes, I normally drive a Private Hire Vehicle
60 - 70	18%	0%	11%
No Change	73%	75%	44%
100 - 120	9%	25%	44%

How do you rate the following statement? ["There is not enough work to support the current number of Hackney Carriages"]

	Yes, I normally drive a Hackney Carriage	Yes, I drive both types of vehicles	Yes, I normally drive a Private Hire Vehicle
Strongly disagree	8%	0%	6%
Disagree	0%	40%	25%
Neither agree or disagree	17%	40%	63%
Agree	42%	20%	6%
Strongly agree	33%	0%	0%

How do you rate the following statement? ["Removing the limit on the number of Hackney Carriages in Braintree District would benefit the public by reducing waiting times at ranks"]

	Yes, I normally drive a Hackney Carriage	Yes, I drive both types of vehicles	Yes, I normally drive a Private Hire Vehicle
Strongly disagree	36%	0%	12%
Disagree	18%	60%	6%
Neither agree or disagree	18%	20%	53%
Agree	18%	20%	24%
Strongly agree	9%	0%	6%

How do you rate the following statement? ["There are special circumstances in Braintree District that make the retention of the numerical limit essential"]

	Yes, I normally drive a Hackney Carriage	Yes, I drive both types of vehicles	Yes, I normally drive a Private Hire Vehicle
Strongly disagree	0%	0%	13%
Disagree	0%	0%	6%
Neither agree or disagree	40%	60%	75%
Agree	30%	20%	6%
Strongly agree	30%	20%	0%

Please choose all of the following effects which could apply to you, if the Council were to remove the numerical limit on the number of Hackney Carriages.

	Yes, I normally drive a Hackney Carriage	Yes, I drive both types of vehicles	Yes, I normally drive a Private Hire Vehicle
0			
No change	0%	18%	52%
Work more hours	42%	18%	22%
Work fewer hours	11%	27%	4%
Acquire a hackney carriage plate	5%	0%	4%
Acquire more than one hackney carriage	0%	0%	0%
Switch from hackney carriage	5%	9%	0%
Switch from private hire	0%	0%	9%
Leave the trade	37%	27%	4%

Government policies and guidance support operation of lower emission vehicles and banning the sale of new fossil fuel vehicles 2030. Would you support the introduction (before 2030) of more stringent emission standards for hackney carriages, to allow ONLY low emission vehicles, in line with these policies?

	Yes, I normally drive a Hackney Carriage	Yes, I drive both types of vehicles	Yes, I normally drive a Private Hire Vehicle
Yes	17%	40%	46%
Perhaps, depending on what standards were applied	75%	40%	33%
No	8%	20%	21%

If you do not support the introduction of tighter emissions standards for licensed vehicles, please explain why? Responses included the following statements:

- It takes finances to replace vehicles with one which you would deem fit for purpose. Can't be forced onto the public.
- Far too expensive, hard to make a decent living in the current climate
- Electric cars are not viable in this area
- Electric cars are proven to not work a full working shift
- Cars not really equipped to do numerous long distance trips in a day
- Perfectly good vehicles being made to come off the road despite meeting emissions standards due to their age
- Unproven that man made climate change is taking place. Reducing CO2 levels will exacerbate the problem not solve it (not that a problem exists in the first place; see GWPF and others for more details). Furthermore there is nowhere near sufficient infrastructure in place for 2030, let alone bringing forward these unnecessary measures. Feel free to contact me for further information.
- It's false big bag theory

If a policy of licensing lower emission vehicles were to be considered, what type of low emission vehicles would you favour, for licensing as Hackney Carriages

	Yes, I normally drive a Hackney Carriage	Yes, I drive both types of vehicles	Yes, I normally drive a Private Hire Vehicle
Electric vehicles only	0%	0%	6%
Petrol hybrid or fully electric vehicles	20%	25%	44%
Petrol or diesel hybrid	40%	50%	22%
Petrol or diesel hybrid, or fully electric vehicles	40%	25%	22%
Plug-in hybrid or fully electric vehicles only	0%	0%	6%

Could you tell us what benefits there would be associated with licensing the type of vehicles identified in the option you chose for the last question, compared with the other options?

Responses included the following statements:

- Lower emission
- Electric don't have the mileage available and take longer to charge
- low pollution without compromise to distance able to travel
- low emissions
- more ethical driving for the environment
- For electric-only taxi vehicles there would be a need for fast-charging points in the District, resulting in additional cost for Council or operators. Also, some drivers would not be able to install charging points at their homes or manage the cost of such. For longer journeys, such as airport or cruise terminal transfers, the use of a hybrid vehicle is more sensible, logistically.
- Less pollution
- Petrol and diesel hybrids are environmentally friendly but fully electric vehicles I think would struggle to charge up .the country doesn't have enough charging points, plus if you are charging it takes time.
- Cost
- Clean air and good standard of car.
- Environment
- In my opinion, opting to a completely electric car without the option of petrol/diesel is not rational. I prefer hybrid, as it would give room for handling breakdown issues in a way that can be easily sorted.

What do you think are the three main barriers to drivers / owners opting to use lower emission vehicles?

Responses included the following barriers, in decreasing order of popularity:

- Cost
- Lack of charge points
- Lack of charge capacity / limited range
- Charge time
- Resale value
- Pedestrian awareness
- Unsafe
- Limited battery life

What are the top three benefits (in your opinion) of moving to a lower emission vehicle?

Top (first choice) benefits selected, from a provided list, were as follows:

	Yes, I normally drive a Hackney Carriage	Yes, I drive both types of vehicles	Yes, I normally drive a Private Hire Vehicle
Applying a whole life cost (WLC) analysis often shows that best in class vehicles are cheaper to operate than conventional and older technology vehicles;	0%	0%	6%
Better air quality (in the vehicle) for drivers and passengers	15%	25%	33%
Better air quality for wider community	38%	75%	61%
Eligibility for lower emission zones, road tax etc ie on road benefits	23%	0%	0%
Customer comfort (customers' journey is improved through quieter, smoother ride)	0%	0%	0%
Customer demand (customers preferentially select or request low emission vehicles)	0%	0%	0%
Eligibility for lower emission zones, road tax etc ie on road benefits	23%	0%	0%
Eligibility for preferential app membership	0%	0%	0%
Lower licensing fees	0%	0%	0%

What are the top three benefits (in your opinion) of moving to a lower emission vehicle?

Second choice benefits selected, from a provided list, were as follows:

	Yes, I normally drive a Hackney Carriage	Yes, I drive both types of vehicles	Yes, I normally drive a Private Hire Vehicle
Applying a whole life cost (WLC) analysis often shows that best in class vehicles are cheaper to operate than conventional and older technology vehicles;	0%	33%	10%
Better air quality (in the vehicle) for drivers and passengers	45%	0%	29%
Better air quality for wider community	18%	67%	19%
Eligibility for lower emission zones, road tax etc ie on road benefits	9%	0%	14%
Customer comfort (customers' journey is improved through quieter, smoother ride)	0%	0%	5%
Customer demand (customers preferentially select or request low emission vehicles)	0%	0%	5%
Eligibility for lower emission zones, road tax etc ie on road benefits	9%	0%	14%
Eligibility for preferential app membership	9%	0%	0%
Lower licensing fees	9%	0%	5%

What are the top three benefits (in your opinion) of moving to a lower emission vehicle?

Third choice benefits selected, from a provided list, were as follows:

	Yes, I normally drive a Hackney Carriage	Yes, I drive both types of vehicles	Yes, I normally drive a Private Hire Vehicle
Applying a whole life cost (WLC) analysis often shows that best in class vehicles are cheaper to operate than conventional and older technology vehicles;	22%	0%	22%
Better air quality (in the vehicle) for drivers and passengers	11%	0%	9%
Better air quality for wider community	0%	67%	0%
Eligibility for lower emission zones, road tax etc ie on road benefits	11%	0%	22%
Customer comfort (customers' journey is improved through quieter, smoother ride)	0%	0%	9%
Customer demand (customers preferentially select or request low emission vehicles)	0%	0%	9%
Eligibility for lower emission zones, road tax etc ie on road benefits	11%	0%	22%
Eligibility for preferential app membership	11%	0%	0%
Lower licensing fees	33%	33%	9%

Do you have any comments/suggestions you wish to make regards the current provision of licensed vehicle testing?
(a long term solution is currently being considered)".

Responses included the following comments:

- Do not understand the question.
- Why have an MOT plus two 6 monthly tests, 1 test 6 months after MOT should be sufficient
- Current status OK
- More garages to use for testing or at minimum more testers
- I am driver, not mechanic.
- They should be more than 1 testing centres
- I think any MOT centre nearest to drivers homes should be ok. It is practically same test as MOT"
- One test station. Central government recommends multiple test stations, to negate anti competition bias. In Braintree, the stench of corruption is high.
- Very rude person for taxi test, every council have more than 1 centre only we have 1 centre sorry to say that really I don't like rude people like him

And the final question, are there any other comments that you would like to make?

Responses included the following statements:

- To purchase a new WC assessable vehicle on finance would be in excess of £150 PW, If you could work the Witham Station rank & take say £1000, you would need to work approximately 70 hours PW over 6 days, take off £150 PW finance, £200 PW fuel, take at least another £100 PW for insurance, licensing fees etc, total min £450 PW expenses, leaves £550 PW before tax for a 70 hour week, earning less than min wage.
- More taxis will only make this worse, it's already going to be hard replacing any existing WC vehicles, it will result in over ranking, over charging as drivers won't make a decent living, more problems for licensing plus more hours for drivers, meaning more danger to the general public."
- Reinstate lines at the main station. Improve management of Hackney's that work during the evening.
- Drop max age a car can be first licensed and base it on quality alone
- Stop the virtue signalling, review ALL scientific literature (not just govt sponsored/IPCC/Met Office disinformation) prior to introducing more unnecessary and costly initiatives that will achieve nothing, other than the impoverishment of the vast majority of the public.
- Questionnaire don't have option 0 hours & answer I don't know
- Card machines should be made compulsory
- More driver checks
- I have been taxi driver for over 7 years if the limitation is removed then will not be enough work and I will be forced to leave the trade . It will not be enough work for anyone and will create a mess.
- I want to add one more thing a lot of customer don't do advance booking when they call they ask for asap but when taxi driver replied 10 to 20 mints wait they replied no we want asap. so this doesn't mean less taxi and more demand. Please don't issue any more plates otherwise current driver will have less work and more financial burden. We can't put more hours if there is more taxi plates.

- Please don't kill the trade. More drivers are coming this gap will fill very soon as D-limit the plates is not a option to solve the issue even it will kill the trade and create more problems. Had fights on rank between the drivers when they can't make the money. We need more drivers not the more plates, I heard that a lot for drivers are coming as every company is bringing new drivers.

In addition to the trade questionnaire, additional discussion was held with individual hackney carriage drivers. Feedback included the following:

It is acknowledged that many drivers undertake pre-booked hires as a substantial proportion of their work. These are a mix of drivers who:

- Drive hackney carriages and work on booking circuits for local private hire operators and
- Owner/drivers who provide contact details on cards for distribution to customers and who are contacted directly by clients to book a hires.

There is not enough demand at ranks to keep all the hackney carriages working from rank based hires only.

Manor Street Rank

The rank on Manor Street attracts a mix of customers and journey distances. Some customers arrive at the rank with bags of shopping and only want to hire a hackney carriage for a short distance. During the daytime, these short distance customers can comprise a significant proportion of hires. At night, the distance that people want to travel can vary, with some longer distance hires.

Witham Station Rank

At Witham Station, Thursday night is the busiest night of the week.

The number of hires is limited by the frequency of train arrivals. Some hires from this rank are local short distance trips. Some are longer distance trips to other nearby towns.

The number of vehicles which can wait at the rank is limited. Additional hackney carriages wait in a car park on White Horse Lane, for space to become available on the station rank. Some drivers who commonly work from this rank have invested in two way radios so that drivers waiting on the rank can inform other drivers who are waiting in the car park, that spaces are available.

General comments

Some pre-booked hires are for longer distances and can take individual vehicles away from the ranks for extended periods. Consequently, these hires reduce availability at the taxi ranks. Drivers who have built up their list of repeat clients have steadily built their client base over extended periods and are heavily reliant on the business that their repeat clients generate.

Private hire feedback

Private hire operators were contacted and invited to provide feedback. One operator provided some feedback, which included the following:

- There is a good level of demand throughout the day and into the evening.
- There is a need for more drivers, there are two principal obstacles to recruiting more drivers, these are the time it takes to complete the licensing process, in particular the time taken to complete the DBS checks and the cost for a 3 year badge. These are up front costs and have to be paid several weeks before a driver can start earning. This lag puts some people off.

6.2 General comments on the industry

Driver shortages are acknowledged as an issue throughout the UK. Drivers often start working as licensed vehicle drivers after having worked in other occupations, often entirely unrelated. Not all new drivers find that driving a private hire vehicle or a hackney carriage is for them and may leave to take up another occupation, after a relatively short period of holding a licensed vehicle badge. Other, relatively experienced drivers have left the industry in order to take up other occupations which offer better income, better working hours or a combination of both.

Within the private hire sector, owner drivers may move between operating companies for a range of reasons. For example, if they feel that another operator offers lower costs for connection to the booking circuit, are likely to provide more bookings, or charge lower commission on each fare.

Some private hire operators may offer incentives to attract new drivers, such as paying the initial costs for licensing and providing assistance for studying for knowledge tests.

The time taken for the licensing process to complete is a common complaint around the UK. The most common issue is the time taken for DBS checks or, in some instances, the time taken to obtain the necessary medical certification.

7 LICENSED VEHICLE MILEAGE ANALYSIS

7.1 Data from vehicle testing

Mileage data was obtained from when tests were undertaken on licensed vehicles. Data was not available for all licensed vehicles in Braintree District. Only those vehicles which had been tested twice or more were used to provide mileage data for the last two tests. This data was then adjusted to provide the equivalent annual mileage, by dividing the difference in mileage between the two tests by the number of days between tests, then multiplying by 365.

The distribution of mileage covered by licensed vehicles is presented in the following figures.

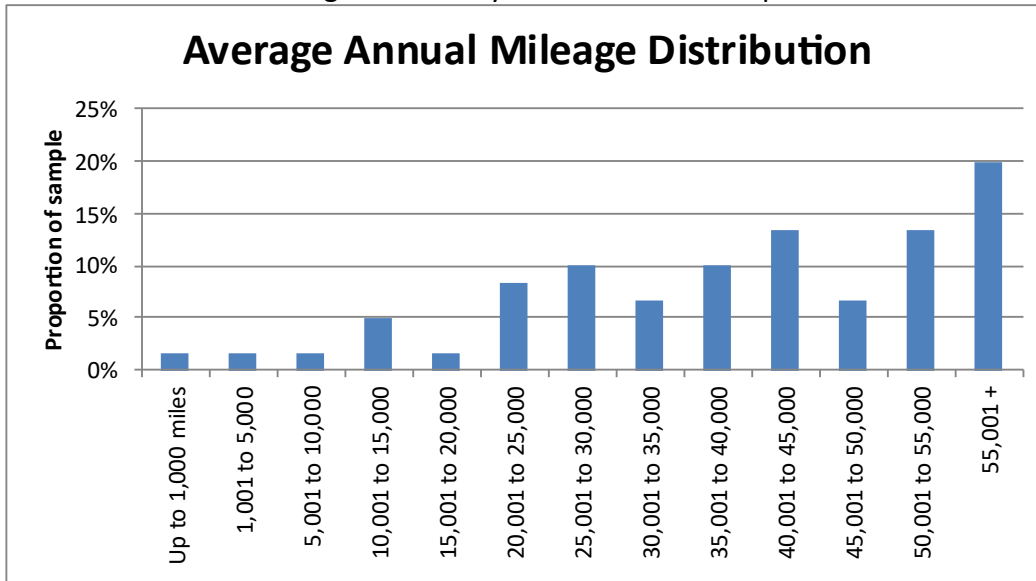


Figure 23 - Mileage distribution for hackney carriages 2023

Out of a sample of 60 hackney carriages, 3 were logged as having covered less than 10,000 miles per annum.

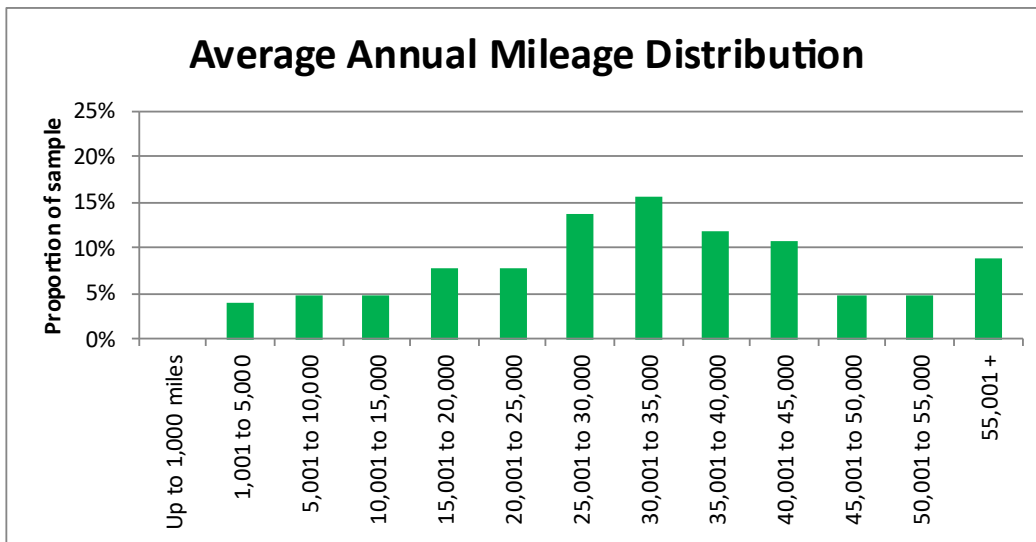


Figure 24 - Mileage distribution for private hire vehicles 2023

The average annual mileage for hackney carriages in the sample was 40,232 miles. The average annual mileage for private hire vehicles was 36,992 miles.

Typical mileage for single shift full time operation of a hackney carriage is generally in the range of 25,000 to 40,000 miles per annum. Over half of the hackney carriages in the sample covered more than 40,000 miles per annum. It is likely that some of these vehicles were being operated by multiple drivers.

Similar analysis was undertaken for hackney carriage mileage for the 2016 unmet demand survey. The results from the 2016 survey were compared with the 2023 survey in Figure 25.

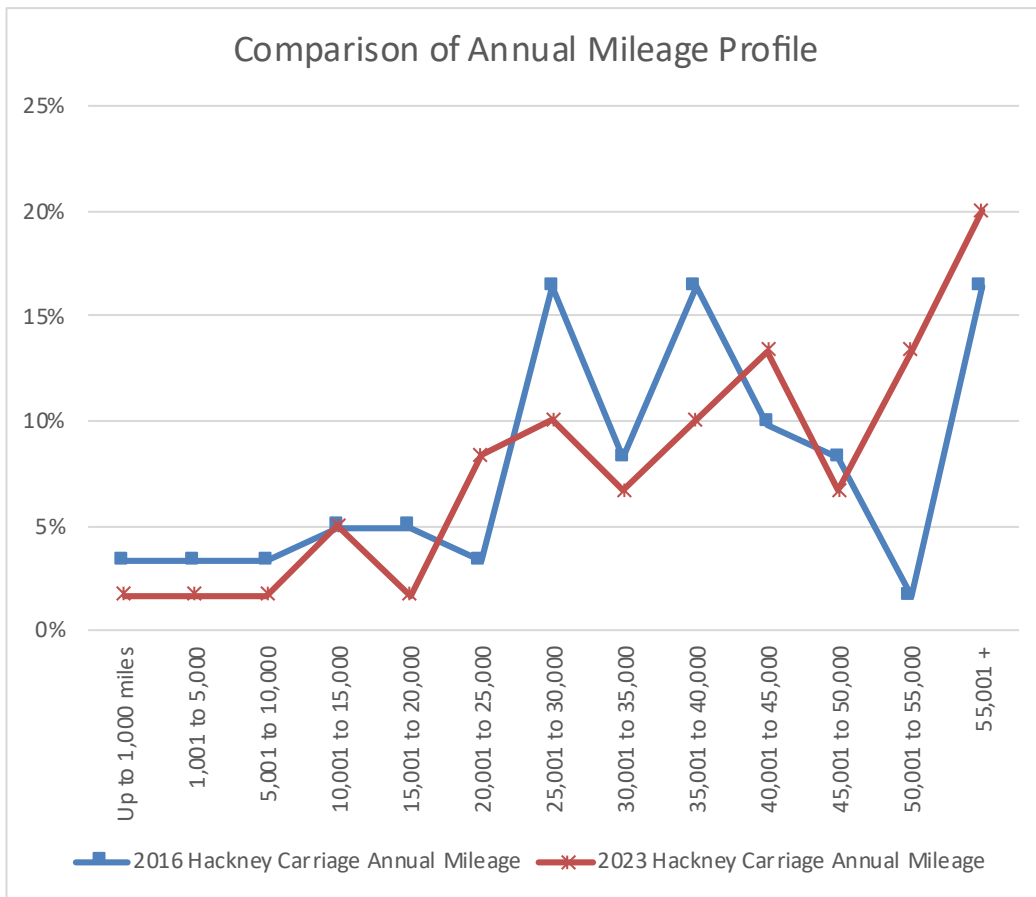


Figure 25 - Comparison of hackney carriage mileage profile, 2016 and 2023 data

The 2023 data suggests that there are fewer vehicles which are operated as single shift full time vehicles in 2023, compared with 2016. However, there appear to be more vehicles which cover higher mileage in 2023. Average annual hackney carriage mileage in 2016 was 35,845 miles.

There are some vehicles in the 2023 sample which cover significantly lower than normal mileage for hackney carriages. These vehicles are unlikely to be in daily service.

8 LICENSED VEHICLE DRIVER LICENSING STATISTICS

Licensed driver applications and renewal statistics since April 2018 has been analysed to present trends in licensed vehicle driver numbers.

The graphs in this section present total licence applications or renewals for the rolling 12 months, up to the month shown.

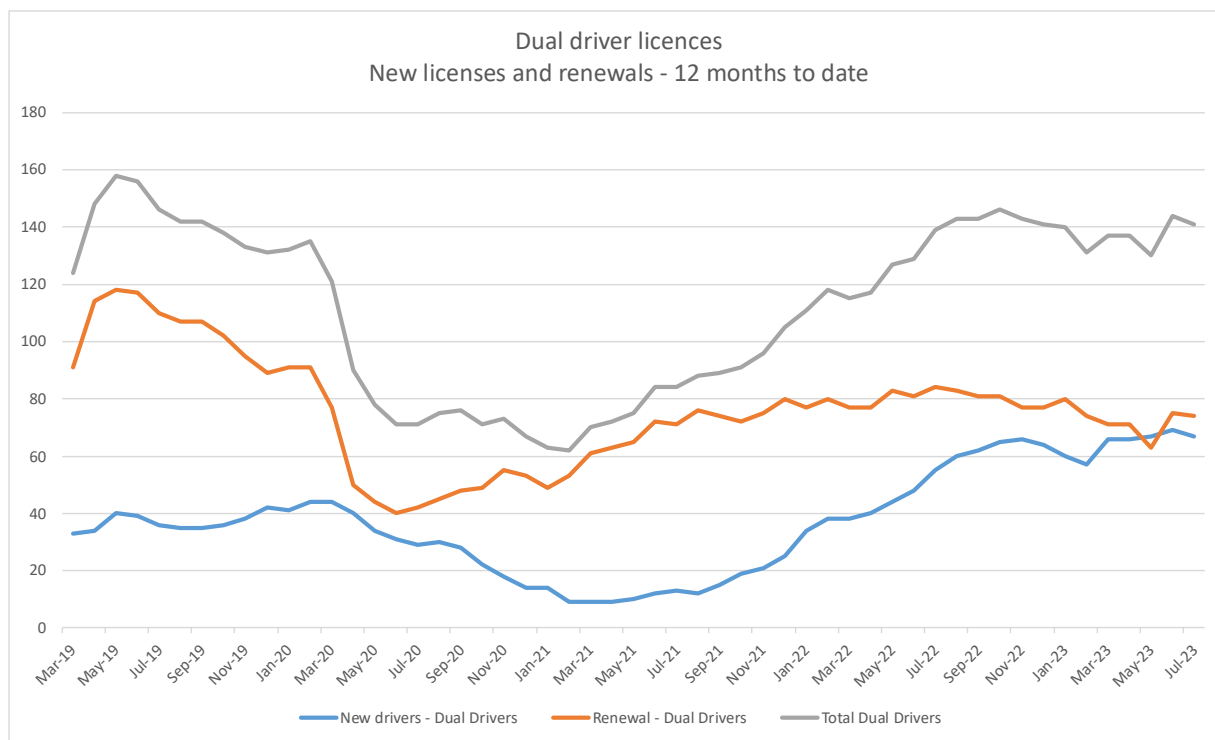


Figure 26 - Hackney carriage driver licence applications and renewals

Hackney carriage drivers are issued with a dual licence. The dual licence enables the driver to drive either hackney carriages or private hire vehicles. Most licences are issued for a three year period.

The graph does not indicate the total number of hackney carriage drivers, but does indicate how many dual licences have been issued or re-issued. If the number of licences issued remained constant, the overall number of licences in circulation would remain constant. If the rate dropped, then the number of licences in circulation would drop over time. Similarly, if the rate of issue were to increase, the number of licences would increase.

The number of licences renewed or issued to new drivers dropped after March 2020. This drop was related to Covid-19 mitigation measures, which limited the scope for renewals or new applications. Those drivers who were due to renew were granted a six month extension. However, during the period immediately following March 2020, lockdown measures meant that there was virtually no demand for hackney carriages and most drivers were not working

as hackney carriage drivers. It is notable that after the initial six month extension, there was not a strong recovery in the rate of licence renewals. Indeed, licence renewals have never recovered to pre-Covid levels. The number of new driver licence applications has increased to levels higher than pre-Covid levels. The combined total of renewals and new applications had increased to pre-Covid levels by July 2022. However, it will take up to three years until the number of licences recovers to pre-Covid levels. Therefore, it is likely that there were fewer drivers working as hackney carriage drivers during the unmet demand survey, compared with pre-Covid times.

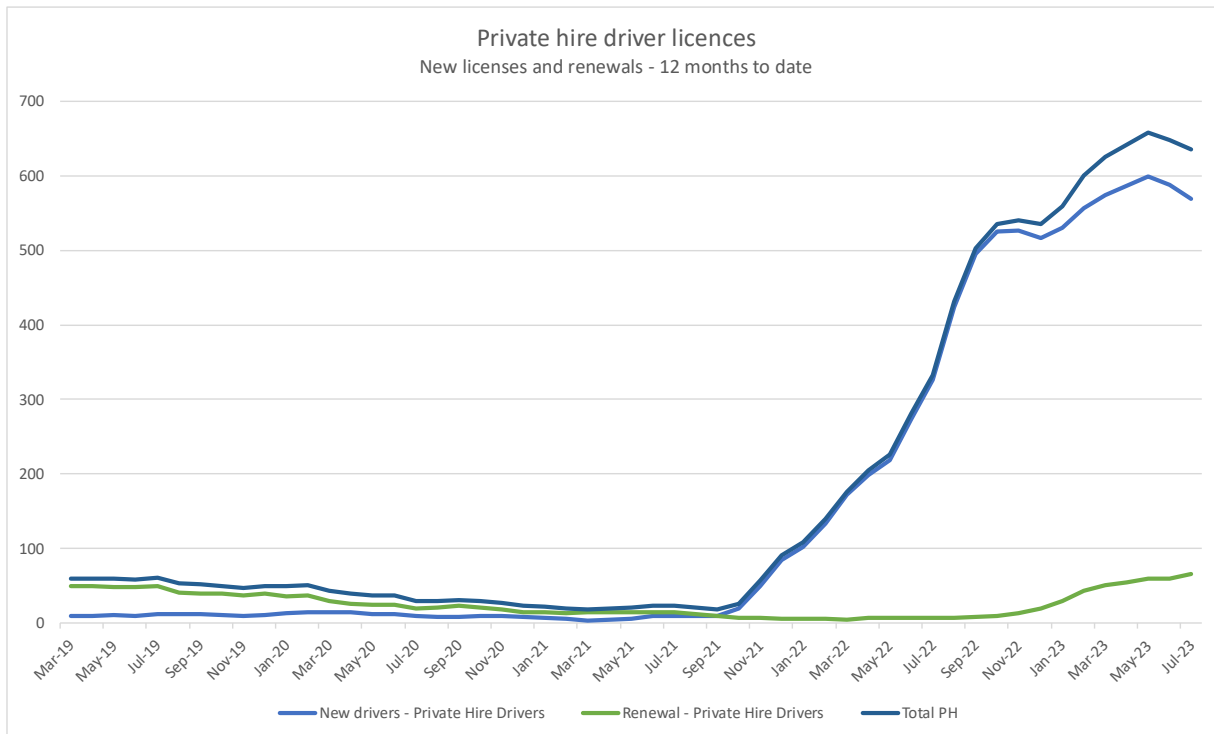


Figure 27 – Private hire driver licence applications and renewals

The number of private hire driver licence renewals and new applications had gradually declined until November 2021. After that date, the rate of new applications increased rapidly. The increase in applications is associated with a single operator who has licensed large numbers of private hire drivers and private hire vehicles. Many of these are operated outside Braintree District. The additional private hire driver licences associated with this operator, are restricted licences, which limit drivers to undertaking contract hires or limousine type hires. The number of ordinary private hire licence renewals and new applications has not increased significantly since November 2021.

9 EVALUATION OF UNMET DEMAND AND ITS SIGNIFICANCE

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

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

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

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

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

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

The first component which can be zero, is the proportion of weekday daytime hours where people are observed to have to wait for a hackney carriage to arrive.

All observed passenger waiting is taken into account. In some situations, some passenger waiting may be observed at taxi ranks, which are rarely used and are rarely serviced by hackney carriages. In order to avoid such events having a disproportionate influence on overall results, individual hours at each rank are classified as active, if there are three or more hires within the hour. If the average waiting time per waiting passenger exceeds one minute at a rank which is deemed to be active, then the hour in which such passenger waiting is observed is included in the SSP calculation. The industry definition of these hours varies, the main index user counts from 10:00 to 18:00 (i.e. eight hours ending at 17:59). The present index is clear that unmet demand cannot be significant if there are no such hours. The only rider on this component is that the sample of hours collected must include a fair element of such hours, and that if the value is non-zero, review of the potential effect of a wider sample needs to be considered. This coefficient is referred to as the Steady State Performance (**SSP**) coefficient.

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 for all passengers travelling during that hour, is greater than one minute. This coefficient is referred to as General Incidence of Delay (**GID**).

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

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

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

Periods when schools are not active can lead to more hackney carriage vehicles being available whilst they are not required for school contract work. Such periods can also reduce hackney carriage demand with people away on holiday from the area. Generally, use of hackney carriages is higher in December in the run-up to Christmas, but much lower in January, February and the parts of July and August when more people are likely to be on

holiday. The factor tends to range from 0.8 for December (factoring high demand level impacts down) to 1.2 for January / February (inflating the values from low demand levels upwards).

There can be special cases where summer demand needs to be covered, for example, to monitor high peaks for tourist use of hackney carriages.

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

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

The **ISUD** index is the result of multiplying each of the components together and benchmarking this against the cut-off value of 80.

Changes in the individual components of the index can also be illustrative. For example, the growth of daytime hour queueing can be an earlier sign of unmet demand developing than might be apparent from the proportion of people experiencing a queue. Change to a peaky demand profile can tend towards reducing the potential for unmet demand to be significant.

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

We have calculated a value for the Incidence of Significant Unmet Demand (ISUD) index using the following standard formula:

$$\text{ISUD} = \text{APD} \times \text{PF} \times \text{SSP} \times \text{GID} \times \text{SF} \times \text{LDF}$$

where:

ISUD = Incidence of Significant Unmet Demand

APD = Average passenger delay across all time periods

PF = whether the demand is highly peaked. This will equal 1 if there is no peaking and 0.5 if peaking is present.

SSP = Steady State Performance - Percentage of weekday daytime hours in which passenger queues are observed

GID = General Incidence of Delay - Proportion of hackney carriage users travelling in hours where average passenger delay exceeds one minute

SF = Seasonality Factor

LDF = Latent Demand Factor. Takes into account trips not made owing to perceived poor quality of service.

9.1 Calculation of ISUD variables

APD: The average delay was determined by calculating the total passenger delay as aggregate passenger delay minutes, then dividing by the total number of passengers, including those who did not suffer any delay.

The Average Passenger Delay was = 1.81 minutes (1 minute 47 seconds).

PF Whilst there were peaks in demand on Thursday, Friday and Saturday evenings, these peaks were not several orders of magnitude higher than other times of day. Therefore, the peak factor value is 1.0.

SSP Week day, daytime hours are deemed to be between 10.00 am and 6.00 pm. The proportion of active rank hours, at each rank, when waiting passengers had an average wait of more than one minute is taken at the SSP coefficient. The SSP proportion is 60.4%.

GID The percentage of hackney carriage users travelling in hours where the average passenger delay exceeds one minute was 41.7%.

SF For this study, the rank surveys were undertaken during June. The level of demand was likely to be neutral, therefore a factor of 1.0 is assumed.

LDF Latent Demand Factor. This is derived from the public attitude survey results and the proportion of passengers observed waiting at the ranks, who gave up waiting before a hackney carriage arrived. It is measured as 1+ proportion giving up waiting. The inclusion of this factor is a response to the latest DfT guidance requiring an estimate of latent demand.

The public consultation survey results indicate that 26.5% of respondents have given up trying to hire a taxi by hailing or at a rank. A slightly lower level of 18% was obtained from the public consultation survey, regarding hailing hackney carriages. Rank observations indicated that 19% of intending passengers had given up waiting at taxi ranks. The higher value from the public consultation survey was used. Therefore, the LDF factor is 1.265.

The ISUD value was calculated as follows, using the variables derived for this study.

ISUD = APD x PF x SSP x GID x SF x LDF

ISUD = 1.81 x 1.0 x 60.4 x 41.7 x 1.0 x 1.265 = **5,766.9**

Where the ISUD value is less than 80, it is generally considered to be an indicator that there is no unmet demand which is significant.

9.2 Consideration of wider factors

The ISUD value of 5,766.9 is a strong indication that unmet demand is above a level which would be considered to be significant. However, it is prudent to consider other aspects of the trade in Braintree to determine whether there are any other factors to be taken into account.

There was consistent frustration expressed by members of the public regarding lack of availability at various times of day. Some stakeholder feedback indicated that lack of availability of licensed vehicles for pre-booking and at the ranks was a notable feature.

The public consultation feedback indicated that lack of availability applied to licensed vehicles for pre-booked hires, along with availability of hackney carriages at ranks.

Trade consultation indicated that many hackney carriage drivers undertake pre-booked hires as a significant component of the hires that they undertake. Many of the drivers provide cards to passengers, with their contact details, in order that passengers may contact the individual drivers directly to book a hire. In order to maintain customer loyalty to individual drivers, those drivers need to provide good service to their clients.

Discussion with drivers at ranks, the distribution of cards and reliance on pre-booked hire grew since the trade returned after Covid-19 restrictions. Demand at the ranks was low after Covid and drivers felt the need to build business through direct bookings by clients. Some passengers felt that it was increasingly difficult to book a licensed vehicle through some of the private hire booking offices. The hackney carriage drivers appear to have taken up some of the unmet demand for private hire during this period.

Feedback from the private hire trade indicates that whilst the number of drivers active in the trade had dropped in recent years, there are more drivers joining the trade. Indeed, the principal constraint is seen as the time it takes for drivers to become licensed.

The number of hires undertaken at ranks was around 27% lower in 2023, compared with the equivalent data obtained during the 2016 unmet demand survey. Despite the lower number of hires, the level of passenger waiting in 2023 is significantly higher than in 2016. In 2016, the ISUD value was 27.2. Significantly lower than the 5,766.9 derived for the 2023 survey.

The number of licensed hackney carriages has not dropped since the survey in 2016. The average annual mileage covered by hackney carriages has increased since 2016. However, the level of deployment of hackney carriages at the ranks is low.

The results of the rank surveys and feedback from stakeholders and the public indicated that the level of unmet demand was significant. Therefore, there is **significant unmet demand**.

Traditionally, the 'standard' approach to dealing with levels of unmet demand which are significant, is to allow for more hackney carriage licences to be issued, either by increasing the limit by a set amount, or by removing the limit altogether. It is worth considering the possible measures available to address the level of unmet demand and to consider whether either increasing or removing the limit altogether could be the best option, or whether changing the limit could be combined with other measures, or whether other measures altogether should be considered.

9.3 Consideration of measures to address the level of unmet demand

The fundamental test of whether to retain, revise or remove a limit to the number of hackney carriages which are licensed, is whether a limit provides a public benefit.

When considering the level of public benefit, a feature to consider is availability of hackney carriages at ranks, or in some localities, for hailing. As both private hire and hackney carriages may be hired through pre-booking and private hire vehicle numbers are not limited, the pre-booking availability levels are not a primary consideration.

A further factor for consideration with respect to public benefit is the quality of service provided by hackney carriages. By comparison with other unmet demand surveys, the level of complaint about the quality of service by hackney carriages, aside from availability, was relatively low, in the public consultation results.

The practice of hackney carriage drivers undertaking pre-booked hires booked directly with the driver is an indicator of good quality of service. In order to have repeat business, it is generally considered that drivers need to have provided a relatively good service.

The fact that the number of hires from the ranks has fallen by 27% doesn't necessarily mean that overall demand for rank hires has dropped by 27%. Some reduction may be as a result of suppressed demand for rank hire. i.e. people who would, under other circumstances, hire hackney carriages from ranks, but don't attempt to do so, as they don't expect hackney carriages to be available. Some of the suppressed demand for rank hire may be fulfilled by passengers booking directly with hackney carriage drivers, for pick up at non-rank locations.

Given the high level of passenger waiting observed, it appears unlikely that all of the reduction in observed hires is as a result of suppressed demand. However, it is likely that some suppressed demand is a feature of the reduction. Therefore, if the level of provision is increased, it is likely that the number of people attempting to hire hackney carriages at ranks would also increase.

The level of available supply of hackney carriages is dependant on three key factors. The more obvious, but perhaps less important factor is the number of hackney carriages licensed. The second factor is the number of drivers who are available to operate hackney carriages. The third factor is the number of hours that hackney carriage drivers are prepared to work.

If the number of licensed hackney carriages were to be increased, that feature in isolation may not have a significant impact on the level of availability. In order for additional vehicles to be deployed and provide additional capacity, additional drivers would be needed to drive the hackney carriages. Some additional drivers may enter the trade. Some drivers may transfer from driving private hire vehicles. Some private hire vehicle owner drivers may either transfer the registration of their private hire vehicle to become registered as a hackney carriage, or sell their private hire vehicle and purchase a vehicle to be registered as a hackney carriage driver.

Under virtually any scenario, whether the limit on hackney carriage numbers is increased or removed altogether, or kept at the current level, additional drivers would be required to increase the level of provision.

Potentially, more drivers may start operating within the trade under one or more of the following scenarios:

- Do nothing and more drivers will join the trade over time.
- Increase fares to accelerate the rate at which new drivers join the trade.
- Enhance night time fares to encourage drivers to work unsocial hours and encourage 'second shift' working of existing and new drivers.
- Increase the limit on hackney carriage numbers, in anticipation that people will take up new licences and either drive the hackney carriages themselves or employ drivers or rent the hackney carriages to other drivers.

Currently, there are licensed hackney carriages within the Braintree fleet which are lightly used and cover very limited mileage. This indicates that these hackney carriages do not provide service to the public, or provide limited service. There may be several potential reasons that these hackney carriages are not in service. These include:

- Vehicle is kept in reserve by the owner to act as replacement, should another vehicle become unusable.
- Vehicle is kept in reserve to be used only at times of peak demand
- Vehicle is ready for use, but no driver is willing to rent the vehicle.
- The owner / regular driver of the vehicle cannot drive the vehicle for whatever reason and is unwilling to sell or rent the vehicle to another owner / driver.
- The vehicle is kept as an investment, in the anticipation that the plate value of the vehicle can be realised through a sale to a new owner.

In order for a driver to rent one of the hackney carriages which are not in use, they would need to reach an agreement with the owner. Similarly, in order to buy one of these vehicles, the cost would incorporate the value of the vehicle itself and an additional value for the hackney carriage plate, to be agreed between parties. In either case, the new owner or driver would need to establish if there was sufficient income to be derived from operating the hackney carriage, to cover the costs and provide sufficient income from profit.

The growth in taxi fares cost, since 2016 has been less than the underlying inflation since 2016. This may have an influence on the attractiveness of the trade, to new drivers. It is recommended that this factor is given due consideration when taxi fares are next reviewed.

10 SUMMARY, SYNTHESIS AND STUDY CONCLUSIONS

This hackney carriage Unmet Demand Survey on behalf of Braintree District has been undertaken following the guidance of the BPG and other recent case history regarding unmet demand and its significance.

The hackney carriage limit has remained constant in recent years, however the number of drivers appears to have reduced. The number of public facing private hire vehicles has reduced in recent years and the number of full licenced private hire drivers has reduced.

The capacity of the licensed vehicle fleet to carry passengers is dependent on both the number of licensed vehicles and the number of licensed vehicle drivers.

The volume of hires observed at ranks has dropped by 27% from 2016 to 2023. Despite lower throughput of passengers the number of passengers who had to wait for a hackney carriage to arrive at the ranks was significantly higher in 2023, compared with 2016.

The level of unmet demand for hackney carriages was significant.

The lack of adequate provision at taxi ranks is likely to be a result of a combination of three principal factors, which are:

- Reduced number of hackney carriage drivers.
- Reduced availability of private hire vehicles to fulfil pre-booked hires, which drives passengers to wait at taxi ranks as a second best option.
- Much of the available hackney carriage provision is engaged in undertaking pre-booked hires, hence reducing attendance at ranks.

The level of hackney carriage fares have reduced in real terms since 2016 and have not kept pace with fares in other licensing areas.

Feedback from the trade indicated that around half of the hackney carriage fleet obtain more hires as pre-booked or contract hires, than they do from taxi ranks.

Taking the total number of hires observed from the rank surveys, over two weeks (3,730) and dividing this by the 82 hackney carriages currently licensed, results in an average of 3.2 hires per vehicle per day. The existing hackney carriage fleet could not survive purely on rank based hires, with 3 to 4 hires per day.

Not all hackney carriage drivers undertake the same mix of hire types. Some focus more on rank hires and some undertake few or no rank hires and are more commonly engaged in undertaking pre-booked hires or contract hires.

The level of capacity available at taxi ranks was clearly not sufficient to cater for passenger demand at all times. At the taxi ranks in Braintree, there were isolated periods when passengers had to wait for hackney carriages to arrive at the taxi ranks. In addition, at times,

there were prolonged periods when passengers had to wait at ranks, with persistent queues of passengers forming.

Some frustration was expressed by the public and stakeholders regarding lack of availability of licensed vehicles to be pre-booked. It is likely that this has driven some passengers, who would otherwise pre-book a hire, to use the ranks. Consequently, if the level of availability of licensed vehicles for pre-booked hires were to increase, then this would ease demand at the taxi ranks. Similarly, if capacity on private hire circuits were to increase, this would be likely to displace hackney carriages from servicing pre-booked hires towards attending ranks.

Some hackney carriages cover relatively low annual mileage, which is an indication that these vehicles are not operating effectively within the hackney carriage fleet in Braintree.

This survey is primarily intended to assess whether the level of unmet demand at taxi ranks or through hailing is significant. There were excessive levels of passenger waiting observed at taxi ranks.

Most of the hires undertaken by hackney carriages were not from ranks. 38% of hackney carriage hires were servicing taxi rank demand, which would imply that there is sufficient theoretical capacity for the existing hackney carriage fleet to meet the existing levels of demand, if only rank based hires were undertaken. However, current working practices ensured that capacity was deployed on other types of hire. Consequently, the level of passenger waiting was above that which would be considered significant.

There is unmet demand which is significant.

11 RECOMMENDATIONS

Based on the evidence gathered in this hackney carriage unmet demand survey for Braintree District, our key conclusion is that there is evidence of unmet demand for the services of hackney carriages both patent and latent which is significant, at this point in time in the Braintree District licensing area.

There are some options which may be considered in order to address the level of unmet demand.

Option 1 – wait for driver numbers and private hire operations to increase, to meet pre-booked hire demand and free hackney carriage capacity to meet demand at the taxi ranks.

Option 2 – increase the number of hackney carriage vehicle licences to enable more hackney carriages to meet demand at taxi ranks. An increase could be to a new specified limit, or to remove the limit altogether.

Option 3 – employ alternative measures to encourage the existing hackney carriage fleet to prioritise rank based demand over pre-booked hire demand, in order to reduce passenger waiting at the taxi ranks.

Option 4 – develop an approach which provides an immediate increase in the number of hackney carriage licences available, coupled with a scheduled increase in hackney carriage fares. These measures would be in anticipation that, if these licences are taken up and put in operation, the pattern of operation would be similar to current practices, i.e. undertaking a mixture of rank based hires, pre-booked hires and contract hires.

In order to justify option 1, a robust projection of future increases in driver numbers and private hire provision would be required to make this policy a defensible plan. No projections have been developed and it is unlikely that any such robust projection will be developed in the near future. It is likely that the private hire supply will grow over time to meet demand and hence displace some hackney carriage operation from pre-booked hires to increase availability at the ranks. However, it is not feasible to estimate the timescale that any such changes would take.

Potential measures to promote Option 3 are limited and would have limited 'enforceability'. Such measures would be limited to discussions to encourage hackney carriage operators to prioritise rank service rather than pre-booked hires, in the face of commercial pressures to do otherwise.

Option 2 would be a robust and defensible approach. However, it should be acknowledged that additional vehicles would require additional drivers to operate them. There are no reliable measures which may be implemented to ensure that licensing of additional hackney carriages will result in additional drivers operating them, in the short term. For example,

some existing drivers of private hire vehicles or second (non owner) drivers of existing hackney carriages may apply for and operate an additional hackney carriage. Such changes would not effectively add capacity to the fleet, as the same drivers would merely switch to operating different vehicles at the same times that they would otherwise be working. It is likely that this measure would be effective over an extended period, however, it is not feasible to forecast how long the measure would take to become effective. Maintaining a limit brings some benefits to the public, such as retaining experienced drivers in the trade. However, if the limit is set at a level which results in significant passenger waiting then the disbenefit of significant unmet demand would be likely to outweigh public benefits associated with maintaining a limit. Therefore, an increased limit would need to be set to a level which is judged to be sufficient to reduce passenger waiting to a level which is below that which would be significant.

If the limit is removed altogether, this would remove the possibility that restrictions on the number of hackney carriages would be associated with the level of passenger waiting. However, for the reasons set out earlier, there is no guarantee that increasing the limit or removing the limit altogether would result in swift eradication of passenger waiting. Removal of the limit may increase the turnover of drivers within the fleet and reduce the average level of experience in the fleet. Removal of the limit may reduce the level of public benefit associated with quality of service.

Option 4 is effectively option 2 with an additional measure (increased fare levels) to encourage more rapid take up and implementation of additional hackney carriage licences. Fare reviews normally follow a periodic cycle. Therefore, it is unlikely that a fare review could be conducted immediately. Consequently, it is anticipated that any fare review associated with Option 4 would follow the schedule of periodic fare reviews and would be implemented independently of any increase in licences.

Increased fares income (if a fares increase were implemented), in due course, would encourage more interest in joining the hackney carriage fleet and meeting demand during unsocial hours.

Option 4 is the recommended option for implementation. Measures would take time to become effective. It is recommended that an increase to the limit of 8 licences is implemented, rather than removal of the limit to the number of hackney carriage licences. A relatively small increase in provision would make a significant difference to the level of passenger waiting at ranks. Around 10% increase (8 hackney carriages) would be assumed to result in a commensurate increase of 10% in capacity, during both peak and off peak periods. This level of increase would not fully eliminate all peak period passenger waiting, but would bring down unmet demand to a level below that which is significant, whilst maintaining the operational viability of hackney carriages at other times during the week.

It is recommended that a fares review is conducted at the earliest opportunity. If the hackney carriage fares were to be increased, this would enhance interest in joining the hackney

carriage fleet and accelerate the increase in availability, more quickly reducing the level of unmet demand and ensuring that operation within the trade is more sustainable.

Notwithstanding the comparison of historic hackney carriage fares with inflation measures earlier in this report, it is acknowledged that any fares review would take a wide range of factors into consideration and would be implemented within that context.

A common concern associated with increasing fares is that demand would fall if fares increase. The level of consumer price inflation and income growth since 2016 have both been higher than the increase in hackney carriage fares since 2016. Consequently, fares are currently more affordable now, than they were in 2016. An increase in fares is likely to have less of an impact on demand than if fares had kept pace with inflation.

The practice of hackney carriages undertaking a mix of pre-booked and rank hires is unlikely to change in the foreseeable future. Public preference has changed in recent years and there is more desire to pre-book licensed vehicles and have them come to collect the passenger from their location, rather than passengers having to walk to taxi ranks. The hackney carriage trade has adapted to meet these changing patterns of demand. The value of the practice of individual owner / drivers providing pre-booked services to repeat clients should not be underestimated. This success of this type of service is a strong indicator of service quality. Drivers need to provide good service to generate repeat business and operating in this way is a strong incentive to provide good levels of service.

APPENDIX A – HOURLY AVERAGE PASSENGER WAIT TIME

Day	Date	Hour Beginning	Aggregate waiting passengers	Aggregate wait time (minutes. Decimal minutes)	Total Passengers	Average wait time for a taxi to arrive at the ranks [Minutes] (For passengers who had to wait)	Average wait time all passengers who board hackney carriages (minutes & decimal minutes)
Sunday (week 1)	18/06/2023	07:00	1	10.33	0	10.33	0.00
Sunday (week 1)	18/06/2023	08:00	0	0.00	4	0.00	0.00
Sunday (week 1)	18/06/2023	09:00	0	0.00	1	0.00	0.00
Sunday (week 1)	18/06/2023	10:00	0	0.00	7	0.00	0.00
Sunday (week 1)	18/06/2023	11:00	0	0.00	5	0.00	0.00
Sunday (week 1)	18/06/2023	12:00	3	12.50	17	4.17	0.74
Sunday (week 1)	18/06/2023	13:00	0	0.00	13	0.00	0.00
Sunday (week 1)	18/06/2023	14:00	2	20.53	14	10.27	1.47
Sunday (week 1)	18/06/2023	15:00	0	0.00	7	0.00	0.00
Sunday (week 1)	18/06/2023	16:00	5	35.50	16	7.10	2.22
Sunday (week 1)	18/06/2023	17:00	4	62.83	14	15.71	4.49
Sunday (week 1)	18/06/2023	18:00	0	0.00	16	0.00	0.00
Sunday (week 1)	18/06/2023	19:00	0	0.00	12	0.00	0.00
Sunday (week 1)	18/06/2023	20:00	0	0.00	15	0.00	0.00
Sunday (week 1)	18/06/2023	21:00	3	14.00	9	4.67	1.56
Sunday (week 1)	18/06/2023	22:00	0	0.00	11	0.00	0.00
Sunday (week 1)	18/06/2023	23:00	0	0.00	5	0.00	0.00
Monday (week 1)	19/06/2023	00:00	0	0.00	11	0.00	0.00
Monday (week 1)	19/06/2023	01:00	0	0.00	0	0.00	0.00
Monday (week 1)	19/06/2023	02:00	0	0.00	0	0.00	0.00
Monday (week 1)	19/06/2023	03:00	0	0.00	0	0.00	0.00
Monday (week 1)	19/06/2023	04:00	0	0.00	0	0.00	0.00
Monday (week 1)	19/06/2023	05:00	2	39.53	0	19.77	0.00
Monday (week 1)	19/06/2023	06:00	0	0.00	1	0.00	0.00
Monday (week 1)	19/06/2023	07:00	0	0.00	1	0.00	0.00
Monday (week 1)	19/06/2023	08:00	2	6.57	9	3.28	0.73
Monday (week 1)	19/06/2023	09:00	1	4.77	10	4.77	0.48
Monday (week 1)	19/06/2023	10:00	0	0.00	22	0.00	0.00
Monday (week 1)	19/06/2023	11:00	0	0.00	15	0.00	0.00
Monday (week 1)	19/06/2023	12:00	0	0.00	27	0.00	0.00
Monday (week 1)	19/06/2023	13:00	4	20.33	18	5.08	1.13
Monday (week 1)	19/06/2023	14:00	0	0.00	21	0.00	0.00
Monday (week 1)	19/06/2023	15:00	11	37.67	22	3.42	1.71
Monday (week 1)	19/06/2023	16:00	2	5.67	12	2.83	0.47
Monday (week 1)	19/06/2023	17:00	3	9.77	20	3.26	0.49
Monday (week 1)	19/06/2023	18:00	0	0.00	21	0.00	0.00
Monday (week 1)	19/06/2023	19:00	0	0.00	18	0.00	0.00
Monday (week 1)	19/06/2023	20:00	0	0.00	6	0.00	0.00
Monday (week 1)	19/06/2023	21:00	0	0.00	10	0.00	0.00
Monday (week 1)	19/06/2023	22:00	0	0.00	16	0.00	0.00
Monday (week 1)	19/06/2023	23:00	0	0.00	11	0.00	0.00
Tuesday (week 1)	20/06/2023	00:00	0	0.00	12	0.00	0.00
Tuesday (week 1)	20/06/2023	01:00	0	0.00	3	0.00	0.00
Tuesday (week 1)	20/06/2023	02:00	0	0.00	0	0.00	0.00
Tuesday (week 1)	20/06/2023	03:00	0	0.00	0	0.00	0.00
Tuesday (week 1)	20/06/2023	04:00	0	0.00	0	0.00	0.00
Tuesday (week 1)	20/06/2023	05:00	0	0.00	0	0.00	0.00
Tuesday (week 1)	20/06/2023	06:00	0	0.00	0	0.00	0.00

Day	Date	Hour Beginning	Aggregate waiting passengers	Aggregate wait time (minutes. Decimal minutes)	Total Passengers	Average wait time for a taxi to arrive at the ranks (Minutes) (For passengers who had to wait)	Average wait time all passengers who board hackney carriages (minutes & decimal minutes)
Tuesday (week 1)	20/06/2023	07:00	1	6.23	1	6.23	6.23
Tuesday (week 1)	20/06/2023	08:00	0	0.00	5	0.00	0.00
Tuesday (week 1)	20/06/2023	09:00	1	3.03	22	3.03	0.14
Tuesday (week 1)	20/06/2023	10:00	0	0.00	10	0.00	0.00
Tuesday (week 1)	20/06/2023	11:00	0	0.00	16	0.00	0.00
Tuesday (week 1)	20/06/2023	12:00	0	0.00	17	0.00	0.00
Tuesday (week 1)	20/06/2023	13:00	0	0.00	25	0.00	0.00
Tuesday (week 1)	20/06/2023	14:00	6	22.23	23	3.71	0.97
Tuesday (week 1)	20/06/2023	15:00	1	1.67	20	1.67	0.08
Tuesday (week 1)	20/06/2023	16:00	5	37.27	27	7.45	1.38
Tuesday (week 1)	20/06/2023	17:00	2	8.25	28	4.12	0.29
Tuesday (week 1)	20/06/2023	18:00	3	21.37	34	7.12	0.63
Tuesday (week 1)	20/06/2023	19:00	2	21.47	13	10.73	1.65
Tuesday (week 1)	20/06/2023	20:00	0	0.00	19	0.00	0.00
Tuesday (week 1)	20/06/2023	21:00	0	0.00	8	0.00	0.00
Tuesday (week 1)	20/06/2023	22:00	1	3.87	24	3.87	0.16
Tuesday (week 1)	20/06/2023	23:00	0	0.00	25	0.00	0.00
Wednesday (week 1)	21/06/2023	00:00	0	0.00	10	0.00	0.00
Wednesday (week 1)	21/06/2023	01:00	0	0.00	0	0.00	0.00
Wednesday (week 1)	21/06/2023	02:00	0	0.00	0	0.00	0.00
Wednesday (week 1)	21/06/2023	03:00	0	0.00	0	0.00	0.00
Wednesday (week 1)	21/06/2023	04:00	0	0.00	0	0.00	0.00
Wednesday (week 1)	21/06/2023	05:00	0	0.00	0	0.00	0.00
Wednesday (week 1)	21/06/2023	06:00	0	0.00	1	0.00	0.00
Wednesday (week 1)	21/06/2023	07:00	0	0.00	3	0.00	0.00
Wednesday (week 1)	21/06/2023	08:00	0	0.00	2	0.00	0.00
Wednesday (week 1)	21/06/2023	09:00	0	0.00	12	0.00	0.00
Wednesday (week 1)	21/06/2023	10:00	0	0.00	10	0.00	0.00
Wednesday (week 1)	21/06/2023	11:00	0	0.00	16	0.00	0.00
Wednesday (week 1)	21/06/2023	12:00	13	25.40	32	1.95	0.79
Wednesday (week 1)	21/06/2023	13:00	4	11.68	27	2.92	0.43
Wednesday (week 1)	21/06/2023	14:00	1	4.63	22	4.63	0.21
Wednesday (week 1)	21/06/2023	15:00	2	5.17	9	2.58	0.57
Wednesday (week 1)	21/06/2023	16:00	4	26.63	14	6.66	1.90
Wednesday (week 1)	21/06/2023	17:00	7	127.83	23	18.26	5.56
Wednesday (week 1)	21/06/2023	18:00	16	108.92	20	6.81	5.45
Wednesday (week 1)	21/06/2023	19:00	0	0.00	20	0.00	0.00
Wednesday (week 1)	21/06/2023	20:00	3	71.17	18	23.72	3.95
Wednesday (week 1)	21/06/2023	21:00	0	0.00	25	0.00	0.00
Wednesday (week 1)	21/06/2023	22:00	1	22.40	20	22.40	1.12
Wednesday (week 1)	21/06/2023	23:00	0	0.00	33	0.00	0.00
Thursday (week 1)	22/06/2023	00:00	1	7.23	10	7.23	0.72
Thursday (week 1)	22/06/2023	01:00	0	0.00	3	0.00	0.00
Thursday (week 1)	22/06/2023	02:00	0	0.00	0	0.00	0.00
Thursday (week 1)	22/06/2023	03:00	0	0.00	0	0.00	0.00
Thursday (week 1)	22/06/2023	04:00	0	0.00	0	0.00	0.00
Thursday (week 1)	22/06/2023	05:00	0	0.00	0	0.00	0.00
Thursday (week 1)	22/06/2023	06:00	0	0.00	0	0.00	0.00

Day	Date	Hour Beginning	Aggregate waiting passengers	Aggregate wait time (minutes. Decimal minutes)	Total Passengers	Average wait time for a taxi to arrive at the ranks (Minutes) (For passengers who had to wait)	Average wait time all passengers who board hackney carriages (minutes & decimal minutes)
Thursday (week 1)	22/06/2023	07:00	0	0.00	2	0.00	0.00
Thursday (week 1)	22/06/2023	08:00	0	0.00	4	0.00	0.00
Thursday (week 1)	22/06/2023	09:00	0	0.00	11	0.00	0.00
Thursday (week 1)	22/06/2023	10:00	0	0.00	13	0.00	0.00
Thursday (week 1)	22/06/2023	11:00	0	0.00	18	0.00	0.00
Thursday (week 1)	22/06/2023	12:00	1	6.93	23	6.93	0.30
Thursday (week 1)	22/06/2023	13:00	4	3.47	19	0.87	0.18
Thursday (week 1)	22/06/2023	14:00	8	55.97	28	7.00	2.00
Thursday (week 1)	22/06/2023	15:00	5	28.53	18	5.71	1.59
Thursday (week 1)	22/06/2023	16:00	9	14.70	27	1.63	0.54
Thursday (week 1)	22/06/2023	17:00	23	137.70	33	5.99	4.17
Thursday (week 1)	22/06/2023	18:00	3	22.63	21	7.54	1.08
Thursday (week 1)	22/06/2023	19:00	2	3.60	19	1.80	0.19
Thursday (week 1)	22/06/2023	20:00	0	0.00	14	0.00	0.00
Thursday (week 1)	22/06/2023	21:00	0	0.00	28	0.00	0.00
Thursday (week 1)	22/06/2023	22:00	3	32.33	43	10.78	0.75
Thursday (week 1)	22/06/2023	23:00	0	0.00	54	0.00	0.00
Friday (week 1)	23/06/2023	00:00	27	394.52	40	14.61	9.86
Friday (week 1)	23/06/2023	01:00	5	30.00	21	6.00	1.43
Friday (week 1)	23/06/2023	02:00	0	0.00	2	0.00	0.00
Friday (week 1)	23/06/2023	03:00	0	0.00	0	0.00	0.00
Friday (week 1)	23/06/2023	04:00	0	0.00	0	0.00	0.00
Friday (week 1)	23/06/2023	05:00	0	0.00	0	0.00	0.00
Friday (week 1)	23/06/2023	06:00	0	0.00	1	0.00	0.00
Friday (week 1)	23/06/2023	07:00	1	24.20	2	24.20	12.10
Friday (week 1)	23/06/2023	08:00	2	20.80	6	10.40	3.47
Friday (week 1)	23/06/2023	09:00	4	31.87	8	7.97	3.98
Friday (week 1)	23/06/2023	10:00	13	92.93	14	7.15	6.64
Friday (week 1)	23/06/2023	11:00	10	34.40	28	3.44	1.23
Friday (week 1)	23/06/2023	12:00	7	56.47	20	8.07	2.82
Friday (week 1)	23/06/2023	13:00	15	79.33	26	5.29	3.05
Friday (week 1)	23/06/2023	14:00	1	6.00	27	6.00	0.22
Friday (week 1)	23/06/2023	15:00	12	138.43	22	11.54	6.29
Friday (week 1)	23/06/2023	16:00	17	120.27	25	7.07	4.81
Friday (week 1)	23/06/2023	17:00	23	114.53	31	4.98	3.69
Friday (week 1)	23/06/2023	18:00	8	47.73	37	5.97	1.29
Friday (week 1)	23/06/2023	19:00	1	4.13	35	4.13	0.12
Friday (week 1)	23/06/2023	20:00	3	21.43	30	7.14	0.71
Friday (week 1)	23/06/2023	21:00	0	0.00	25	0.00	0.00
Friday (week 1)	23/06/2023	22:00	1	1.37	28	1.37	0.05
Friday (week 1)	23/06/2023	23:00	0	0.00	56	0.00	0.00
Saturday (week 1)	24/06/2023	00:00	5	13.27	40	2.65	0.33
Saturday (week 1)	24/06/2023	01:00	12	59.03	59	4.92	1.00
Saturday (week 1)	24/06/2023	02:00	8	72.27	25	9.03	2.89
Saturday (week 1)	24/06/2023	03:00	6	87.33	9	14.56	9.70
Saturday (week 1)	24/06/2023	04:00	0	0.00	1	0.00	0.00
Saturday (week 1)	24/06/2023	05:00	0	0.00	0	0.00	0.00
Saturday (week 1)	24/06/2023	06:00	0	0.00	0	0.00	0.00

Day	Date	Hour Beginning	Aggregate waiting passengers	Aggregate wait time (minutes. Decimal minutes)	Total Passengers	Average wait time for a taxi to arrive at the ranks [Minutes] (For passengers who had to wait)	Average wait time all passengers who board hackney carriages (minutes & decimal minutes)
Saturday (week 1)	24/06/2023	07:00	0	0.00	1	0.00	0.00
Saturday (week 1)	24/06/2023	08:00	0	0.00	3	0.00	0.00
Saturday (week 1)	24/06/2023	09:00	1	4.07	13	4.07	0.31
Saturday (week 1)	24/06/2023	10:00	1	2.03	7	2.03	0.29
Saturday (week 1)	24/06/2023	11:00	23	196.37	23	8.54	8.54
Saturday (week 1)	24/06/2023	12:00	5	30.13	19	6.03	1.59
Saturday (week 1)	24/06/2023	13:00	4	20.43	33	5.11	0.62
Saturday (week 1)	24/06/2023	14:00	0	0.00	34	0.00	0.00
Saturday (week 1)	24/06/2023	15:00	0	0.00	23	0.00	0.00
Saturday (week 1)	24/06/2023	16:00	5	22.10	27	4.42	0.82
Saturday (week 1)	24/06/2023	17:00	0	0.00	34	0.00	0.00
Saturday (week 1)	24/06/2023	18:00	2	13.20	27	6.60	0.49
Saturday (week 1)	24/06/2023	19:00	0	0.00	12	0.00	0.00
Saturday (week 1)	24/06/2023	20:00	3	8.80	28	2.93	0.31
Saturday (week 1)	24/06/2023	21:00	2	11.00	43	5.50	0.26
Saturday (week 1)	24/06/2023	22:00	18	291.77	27	16.21	10.81
Saturday (week 1)	24/06/2023	23:00	0	0.00	69	0.00	0.00
Sunday (week 2)	25/06/2023	00:00	39	357.93	58	9.18	6.17
Sunday (week 2)	25/06/2023	01:00	22	235.23	41	10.69	5.74
Sunday (week 2)	25/06/2023	02:00	2	27.80	23	13.90	1.21
Sunday (week 2)	25/06/2023	03:00	0	0.00	5	0.00	0.00
Sunday (week 2)	25/06/2023	04:00	0	0.00	0	0.00	0.00
Sunday (week 2)	25/06/2023	05:00	0	0.00	0	0.00	0.00
Sunday (week 2)	25/06/2023	06:00	0	0.00	0	0.00	0.00
Sunday (week 2)	25/06/2023	07:00	0	0.00	3	0.00	0.00
Sunday (week 2)	25/06/2023	08:00	2	30.87	2	15.43	15.43
Sunday (week 2)	25/06/2023	09:00	0	0.00	1	0.00	0.00
Sunday (week 2)	25/06/2023	10:00	3	34.70	4	11.57	8.68
Sunday (week 2)	25/06/2023	11:00	6	30.47	7	5.08	4.35
Sunday (week 2)	25/06/2023	12:00	0	0.00	15	0.00	0.00
Sunday (week 2)	25/06/2023	13:00	1	22.77	18	22.77	1.26
Sunday (week 2)	25/06/2023	14:00	3	20.60	15	6.87	1.37
Sunday (week 2)	25/06/2023	15:00	12	46.93	19	3.91	2.47
Sunday (week 2)	25/06/2023	16:00	9	38.47	21	4.27	1.83
Sunday (week 2)	25/06/2023	17:00	0	0.00	12	0.00	0.00
Sunday (week 2)	25/06/2023	18:00	3	10.70	7	3.57	1.53
Sunday (week 2)	25/06/2023	19:00	4	26.03	11	6.51	2.37
Sunday (week 2)	25/06/2023	20:00	0	0.00	11	0.00	0.00
Sunday (week 2)	25/06/2023	21:00	0	0.00	11	0.00	0.00
Sunday (week 2)	25/06/2023	22:00	1	1.23	12	1.23	0.10
Sunday (week 2)	25/06/2023	23:00	0	0.00	12	0.00	0.00
Monday (week 2)	26/06/2023	00:00	5	128.83	17	25.77	7.58
Monday (week 2)	26/06/2023	01:00	0	0.00	0	0.00	0.00
Monday (week 2)	26/06/2023	02:00	0	0.00	0	0.00	0.00
Monday (week 2)	26/06/2023	03:00	0	0.00	0	0.00	0.00
Monday (week 2)	26/06/2023	04:00	0	0.00	0	0.00	0.00
Monday (week 2)	26/06/2023	05:00	0	0.00	1	0.00	0.00
Monday (week 2)	26/06/2023	06:00	0	0.00	0	0.00	0.00

Day	Date	Hour Beginning	Aggregate waiting passengers	Aggregate wait time (minutes. Decimal minutes)	Total Passengers	Average wait time for a taxi to arrive at the ranks [Minutes] (For passengers who had to wait)	Average wait time all passengers who board hackney carriages (minutes & decimal minutes)
Monday (week 2)	26/06/2023	07:00	0	0.00	7	0.00	0.00
Monday (week 2)	26/06/2023	08:00	2	27.33	8	13.67	3.42
Monday (week 2)	26/06/2023	09:00	0	0.00	11	0.00	0.00
Monday (week 2)	26/06/2023	10:00	0	0.00	14	0.00	0.00
Monday (week 2)	26/06/2023	11:00	3	17.67	13	5.89	1.36
Monday (week 2)	26/06/2023	12:00	5	24.87	24	4.97	1.04
Monday (week 2)	26/06/2023	13:00	7	25.73	26	3.68	0.99
Monday (week 2)	26/06/2023	14:00	7	48.77	13	6.97	3.75
Monday (week 2)	26/06/2023	15:00	17	104.47	22	6.15	4.75
Monday (week 2)	26/06/2023	16:00	6	47.57	24	7.93	1.98
Monday (week 2)	26/06/2023	17:00	4	35.67	13	8.92	2.74
Monday (week 2)	26/06/2023	18:00	5	23.13	16	4.63	1.45
Monday (week 2)	26/06/2023	19:00	1	7.33	24	7.33	0.31
Monday (week 2)	26/06/2023	20:00	0	0.00	8	0.00	0.00
Monday (week 2)	26/06/2023	21:00	4	10.63	8	2.66	1.33
Monday (week 2)	26/06/2023	22:00	7	114.27	15	16.32	7.62
Monday (week 2)	26/06/2023	23:00	0	0.00	10	0.00	0.00
Tuesday (week 2)	27/06/2023	00:00	0	0.00	12	0.00	0.00
Tuesday (week 2)	27/06/2023	01:00	0	0.00	5	0.00	0.00
Tuesday (week 2)	27/06/2023	02:00	0	0.00	0	0.00	0.00
Tuesday (week 2)	27/06/2023	03:00	0	0.00	0	0.00	0.00
Tuesday (week 2)	27/06/2023	04:00	0	0.00	0	0.00	0.00
Tuesday (week 2)	27/06/2023	05:00	0	0.00	0	0.00	0.00
Tuesday (week 2)	27/06/2023	06:00	0	0.00	0	0.00	0.00
Tuesday (week 2)	27/06/2023	07:00	0	0.00	1	0.00	0.00
Tuesday (week 2)	27/06/2023	08:00	0	0.00	2	0.00	0.00
Tuesday (week 2)	27/06/2023	09:00	2	9.00	7	4.50	1.29
Tuesday (week 2)	27/06/2023	10:00	3	11.63	10	3.88	1.16
Tuesday (week 2)	27/06/2023	11:00	2	20.37	21	10.18	0.97
Tuesday (week 2)	27/06/2023	12:00	5	11.83	18	2.37	0.66
Tuesday (week 2)	27/06/2023	13:00	5	18.87	19	3.77	0.99
Tuesday (week 2)	27/06/2023	14:00	2	2.20	21	1.10	0.10
Tuesday (week 2)	27/06/2023	15:00	4	20.87	20	5.22	1.04
Tuesday (week 2)	27/06/2023	16:00	2	7.87	21	3.93	0.37
Tuesday (week 2)	27/06/2023	17:00	1	12.00	12	12.00	1.00
Tuesday (week 2)	27/06/2023	18:00	11	94.47	15	8.59	6.30
Tuesday (week 2)	27/06/2023	19:00	2	14.50	28	7.25	0.52
Tuesday (week 2)	27/06/2023	20:00	0	0.00	12	0.00	0.00
Tuesday (week 2)	27/06/2023	21:00	3	12.47	13	4.16	0.96
Tuesday (week 2)	27/06/2023	22:00	7	44.03	21	6.29	2.10
Tuesday (week 2)	27/06/2023	23:00	0	0.00	19	0.00	0.00
Wednesday (week 2)	28/06/2023	00:00	0	0.00	12	0.00	0.00
Wednesday (week 2)	28/06/2023	01:00	0	0.00	1	0.00	0.00
Wednesday (week 2)	28/06/2023	02:00	0	0.00	0	0.00	0.00
Wednesday (week 2)	28/06/2023	03:00	0	0.00	0	0.00	0.00
Wednesday (week 2)	28/06/2023	04:00	0	0.00	0	0.00	0.00
Wednesday (week 2)	28/06/2023	05:00	0	0.00	0	0.00	0.00
Wednesday (week 2)	28/06/2023	06:00	0	0.00	0	0.00	0.00

Day	Date	Hour Beginning	Aggregate waiting passengers	Aggregate wait time (minutes. Decimal minutes)	Total Passengers	Average wait time for a taxi to arrive at the ranks (Minutes) (For passengers who had to wait)	Average wait time all passengers who board hackney carriages (minutes & decimal minutes)
Wednesday (week 2)	28/06/2023	07:00	0	0.00	4	0.00	0.00
Wednesday (week 2)	28/06/2023	08:00	0	0.00	4	0.00	0.00
Wednesday (week 2)	28/06/2023	09:00	0	0.00	13	0.00	0.00
Wednesday (week 2)	28/06/2023	10:00	1	2.20	13	2.20	0.17
Wednesday (week 2)	28/06/2023	11:00	2	4.13	20	2.07	0.21
Wednesday (week 2)	28/06/2023	12:00	3	10.30	20	3.43	0.52
Wednesday (week 2)	28/06/2023	13:00	9	185.40	11	20.60	16.85
Wednesday (week 2)	28/06/2023	14:00	14	140.73	20	10.05	7.04
Wednesday (week 2)	28/06/2023	15:00	10	65.40	23	6.54	2.84
Wednesday (week 2)	28/06/2023	16:00	6	106.27	12	17.71	8.86
Wednesday (week 2)	28/06/2023	17:00	12	109.82	19	9.15	5.78
Wednesday (week 2)	28/06/2023	18:00	2	5.17	10	2.58	0.52
Wednesday (week 2)	28/06/2023	19:00	9	74.47	17	8.27	4.38
Wednesday (week 2)	28/06/2023	20:00	2	11.27	14	5.63	0.80
Wednesday (week 2)	28/06/2023	21:00	2	13.27	27	6.63	0.49
Wednesday (week 2)	28/06/2023	22:00	5	22.57	22	4.51	1.03
Wednesday (week 2)	28/06/2023	23:00	0	0.00	23	0.00	0.00
Thursday (week 2)	29/06/2023	00:00	3	22.17	15	7.39	1.48
Thursday (week 2)	29/06/2023	01:00	3	15.93	9	5.31	1.77
Thursday (week 2)	29/06/2023	02:00	0	0.00	2	0.00	0.00
Thursday (week 2)	29/06/2023	03:00	0	0.00	0	0.00	0.00
Thursday (week 2)	29/06/2023	04:00	0	0.00	0	0.00	0.00
Thursday (week 2)	29/06/2023	05:00	0	0.00	0	0.00	0.00
Thursday (week 2)	29/06/2023	06:00	0	0.00	1	0.00	0.00
Thursday (week 2)	29/06/2023	07:00	0	0.00	2	0.00	0.00
Thursday (week 2)	29/06/2023	08:00	3	5.40	5	1.80	1.08
Thursday (week 2)	29/06/2023	09:00	1	4.17	8	4.17	0.52
Thursday (week 2)	29/06/2023	10:00	0	0.00	9	0.00	0.00
Thursday (week 2)	29/06/2023	11:00	4	39.00	17	9.75	2.29
Thursday (week 2)	29/06/2023	12:00	1	22.03	14	22.03	1.57
Thursday (week 2)	29/06/2023	13:00	5	13.47	19	2.69	0.71
Thursday (week 2)	29/06/2023	14:00	4	17.07	9	4.27	1.90
Thursday (week 2)	29/06/2023	15:00	2	4.90	12	2.45	0.41
Thursday (week 2)	29/06/2023	16:00	6	20.67	18	3.44	1.15
Thursday (week 2)	29/06/2023	17:00	5	44.23	19	8.85	2.33
Thursday (week 2)	29/06/2023	18:00	2	10.10	28	5.05	0.36
Thursday (week 2)	29/06/2023	19:00	3	16.77	23	5.59	0.73
Thursday (week 2)	29/06/2023	20:00	3	28.30	22	9.43	1.29
Thursday (week 2)	29/06/2023	21:00	8	35.60	21	4.45	1.70
Thursday (week 2)	29/06/2023	22:00	0	0.00	35	0.00	0.00
Thursday (week 2)	29/06/2023	23:00	0	0.00	40	0.00	0.00
Friday (week 2)	30/06/2023	00:00	36	595.03	42	16.53	14.17
Friday (week 2)	30/06/2023	01:00	8	44.47	31	5.56	1.43
Friday (week 2)	30/06/2023	02:00	0	0.00	0	0.00	0.00
Friday (week 2)	30/06/2023	03:00	0	0.00	0	0.00	0.00
Friday (week 2)	30/06/2023	04:00	0	0.00	0	0.00	0.00
Friday (week 2)	30/06/2023	05:00	0	0.00	1	0.00	0.00
Friday (week 2)	30/06/2023	06:00	0	0.00	0	0.00	0.00

Day	Date	Hour Beginning	Aggregate waiting passengers	Aggregate wait time (minutes. Decimal minutes)	Total Passengers	Average wait time for a taxi to arrive at the ranks (Minutes) (For passengers who had to wait)	Average wait time all passengers who board hackney carriages (minutes & decimal minutes)
Friday (week 2)	30/06/2023	07:00	0	0.00	3	0.00	0.00
Friday (week 2)	30/06/2023	08:00	0	0.00	12	0.00	0.00
Friday (week 2)	30/06/2023	09:00	0	0.00	11	0.00	0.00
Friday (week 2)	30/06/2023	10:00	1	4.43	12	4.43	0.37
Friday (week 2)	30/06/2023	11:00	2	5.20	29	2.60	0.18
Friday (week 2)	30/06/2023	12:00	5	60.70	26	12.14	2.33
Friday (week 2)	30/06/2023	13:00	6	28.00	19	4.67	1.47
Friday (week 2)	30/06/2023	14:00	14	97.20	18	6.94	5.40
Friday (week 2)	30/06/2023	15:00	12	81.90	21	6.83	3.90
Friday (week 2)	30/06/2023	16:00	14	97.57	37	6.97	2.64
Friday (week 2)	30/06/2023	17:00	9	65.33	24	7.26	2.72
Friday (week 2)	30/06/2023	18:00	10	76.97	28	7.70	2.75
Friday (week 2)	30/06/2023	19:00	11	58.53	31	5.32	1.89
Friday (week 2)	30/06/2023	20:00	0	0.00	38	0.00	0.00
Friday (week 2)	30/06/2023	21:00	1	2.10	21	2.10	0.10
Friday (week 2)	30/06/2023	22:00	9	56.60	47	6.29	1.20
Friday (week 2)	30/06/2023	23:00	0	0.00	78	0.00	0.00
Saturday (week 2)	01/07/2023	00:00	37	269.93	57	7.30	4.74
Saturday (week 2)	01/07/2023	01:00	10	61.33	65	6.13	0.94
Saturday (week 2)	01/07/2023	02:00	0	0.00	29	0.00	0.00
Saturday (week 2)	01/07/2023	03:00	0	0.00	4	0.00	0.00
Saturday (week 2)	01/07/2023	04:00	0	0.00	0	0.00	0.00
Saturday (week 2)	01/07/2023	05:00	0	0.00	0	0.00	0.00
Saturday (week 2)	01/07/2023	06:00	0	0.00	0	0.00	0.00
Saturday (week 2)	01/07/2023	07:00	0	0.00	0	0.00	0.00
Saturday (week 2)	01/07/2023	08:00	0	0.00	0	0.00	0.00
Saturday (week 2)	01/07/2023	09:00	4	25.37	6	6.34	4.23
Saturday (week 2)	01/07/2023	10:00	8	37.60	9	4.70	4.18
Saturday (week 2)	01/07/2023	11:00	13	46.83	19	3.60	2.46
Saturday (week 2)	01/07/2023	12:00	20	133.93	22	6.70	6.09
Saturday (week 2)	01/07/2023	13:00	11	82.90	30	7.54	2.76
Saturday (week 2)	01/07/2023	14:00	14	136.00	30	9.71	4.53
Saturday (week 2)	01/07/2023	15:00	5	45.13	38	9.03	1.19
Saturday (week 2)	01/07/2023	16:00	0	0.00	28	0.00	0.00
Saturday (week 2)	01/07/2023	17:00	0	0.00	36	0.00	0.00
Saturday (week 2)	01/07/2023	18:00	2	2.53	42	1.27	0.06
Saturday (week 2)	01/07/2023	19:00	10	74.43	24	7.44	3.10
Saturday (week 2)	01/07/2023	20:00	2	2.60	12	1.30	0.22
Saturday (week 2)	01/07/2023	21:00	1	2.03	26	2.03	0.08
Saturday (week 2)	01/07/2023	22:00	17	159.67	10	9.39	15.97
Saturday (week 2)	01/07/2023	23:00	0	0.00	27	0.00	0.00
Sunday (week 3)	02/07/2023	00:00	41	565.20	30	13.79	18.84
Sunday (week 3)	02/07/2023	01:00	36	370.90	33	10.30	11.24
Sunday (week 3)	02/07/2023	02:00	8	27.13	32	3.39	0.85
Sunday (week 3)	02/07/2023	03:00	0	0.00	20	0.00	0.00
Sunday (week 3)	02/07/2023	04:00	0	0.00	0	0.00	0.00
Sunday (week 3)	02/07/2023	05:00	0	0.00	0	0.00	0.00
Sunday (week 3)	02/07/2023	06:00	0	0.00	2	0.00	0.00

APPENDIX B – HOURLY HACKNEY CARRIAGES LEAVING RANKS EMPTY

Hour beginning	Trinity Street, Halstead	Braintree Village rank, Bus stops	Station Approach, Braintree	Rayne Road, Braintree	Manor Street, Braintree	Albert Road, Witham (Station)
Sunday (week 1) 07:00	0	0	0	0	0	0
Sunday (week 1) 08:00	0	0	0	0	0	0
Sunday (week 1) 09:00	0	0	0	0	1	0
Sunday (week 1) 10:00	0	0	0	0	1	1
Sunday (week 1) 11:00	0	0	0	0	2	0
Sunday (week 1) 12:00	0	0	0	0	0	2
Sunday (week 1) 13:00	0	0	1	0	1	0
Sunday (week 1) 14:00	0	0	0	0	0	1
Sunday (week 1) 15:00	0	0	0	0	3	0
Sunday (week 1) 16:00	0	0	0	0	3	4
Sunday (week 1) 17:00	0	0	0	0	0	0
Sunday (week 1) 18:00	0	0	0	0	2	2
Sunday (week 1) 19:00	0	0	1	0	5	1
Sunday (week 1) 20:00	0	0	0	0	0	1
Sunday (week 1) 21:00	0	0	0	0	3	0
Sunday (week 1) 22:00	0	0	1	0	2	3
Sunday (week 1) 23:00	0	0	0	0	2	4
Monday (week 1) 00:00	0	0	0	0	1	0
Monday (week 1) 01:00	0	0	0	0	0	0
Monday (week 1) 02:00	0	0	0	0	0	0
Monday (week 1) 03:00	0	0	0	0	0	0
Monday (week 1) 04:00	0	0	0	0	0	0
Monday (week 1) 05:00	0	0	0	0	0	0
Monday (week 1) 06:00	0	0	1	0	0	1
Monday (week 1) 07:00	0	0	1	0	0	2
Monday (week 1) 08:00	0	0	2	0	2	1
Monday (week 1) 09:00	0	0	1	0	2	1
Monday (week 1) 10:00	0	0	0	0	2	2
Monday (week 1) 11:00	0	0	1	0	4	1
Monday (week 1) 12:00	0	0	1	1	1	0
Monday (week 1) 13:00	0	1	1	0	4	2
Monday (week 1) 14:00	0	0	0	0	3	2
Monday (week 1) 15:00	0	0	0	0	2	1
Monday (week 1) 16:00	0	0	1	0	2	1
Monday (week 1) 17:00	0	0	1	0	1	0
Monday (week 1) 18:00	0	0	0	0	5	1
Monday (week 1) 19:00	0	0	2	0	3	0
Monday (week 1) 20:00	0	0	0	0	2	4
Monday (week 1) 21:00	0	0	0	0	1	2
Monday (week 1) 22:00	0	0	0	0	0	0
Monday (week 1) 23:00	0	0	0	0	1	0
Tuesday (week 1) 00:00	0	0	0	0	0	0
Tuesday (week 1) 01:00	0	0	0	0	0	2
Tuesday (week 1) 02:00	0	0	0	0	0	0
Tuesday (week 1) 03:00	0	0	0	0	0	0
Tuesday (week 1) 04:00	0	0	0	0	0	0
Tuesday (week 1) 05:00	0	0	0	0	0	0
Tuesday (week 1) 06:00	0	0	0	0	0	0

Hour beginning	Trinity Street, Halstead	Braintree Village rank, Bus stops	Station Approach, Braintree	Rayne Road, Braintree	Manor Street, Braintree	Albert Road, Witham (Station)
Tuesday (week 1) 07:00	0	0	0	0	1	0
Tuesday (week 1) 08:00	0	0	0	0	3	1
Tuesday (week 1) 09:00	0	0	0	0	4	0
Tuesday (week 1) 10:00	0	0	2	0	4	0
Tuesday (week 1) 11:00	0	0	1	0	4	3
Tuesday (week 1) 12:00	0	0	0	0	4	0
Tuesday (week 1) 13:00	0	0	1	0	1	1
Tuesday (week 1) 14:00	0	0	1	1	2	0
Tuesday (week 1) 15:00	0	0	0	0	1	2
Tuesday (week 1) 16:00	0	0	0	0	2	2
Tuesday (week 1) 17:00	0	0	0	0	1	0
Tuesday (week 1) 18:00	0	0	1	0	2	0
Tuesday (week 1) 19:00	0	0	0	0	2	2
Tuesday (week 1) 20:00	0	0	2	0	4	0
Tuesday (week 1) 21:00	0	0	0	0	3	0
Tuesday (week 1) 22:00	0	0	0	0	5	0
Tuesday (week 1) 23:00	0	0	0	0	0	3
Wednesday (week 1) 00:00	0	0	1	0	1	9
Wednesday (week 1) 01:00	0	0	0	0	0	0
Wednesday (week 1) 02:00	0	0	0	0	0	0
Wednesday (week 1) 03:00	0	0	0	0	0	0
Wednesday (week 1) 04:00	0	0	0	0	0	0
Wednesday (week 1) 05:00	0	0	0	0	1	0
Wednesday (week 1) 06:00	0	0	0	0	1	0
Wednesday (week 1) 07:00	0	0	1	0	2	1
Wednesday (week 1) 08:00	0	0	0	0	1	2
Wednesday (week 1) 09:00	0	0	0	0	2	2
Wednesday (week 1) 10:00	0	0	0	0	5	0
Wednesday (week 1) 11:00	0	0	1	0	4	0
Wednesday (week 1) 12:00	0	0	1	0	3	1
Wednesday (week 1) 13:00	0	0	3	0	2	1
Wednesday (week 1) 14:00	0	0	1	0	2	1
Wednesday (week 1) 15:00	0	0	2	1	3	1
Wednesday (week 1) 16:00	0	0	0	0	7	0
Wednesday (week 1) 17:00	0	0	1	1	1	2
Wednesday (week 1) 18:00	0	0	0	0	3	1
Wednesday (week 1) 19:00	0	0	0	0	3	3
Wednesday (week 1) 20:00	0	0	1	0	4	0
Wednesday (week 1) 21:00	0	0	0	0	0	1
Wednesday (week 1) 22:00	0	0	0	0	1	2
Wednesday (week 1) 23:00	0	0	0	0	0	0
Thursday (week 1) 00:00	0	0	0	0	0	9
Thursday (week 1) 01:00	0	0	0	0	1	7
Thursday (week 1) 02:00	0	0	0	0	0	0
Thursday (week 1) 03:00	0	0	0	0	0	0
Thursday (week 1) 04:00	0	0	0	0	0	0
Thursday (week 1) 05:00	0	0	0	0	0	0
Thursday (week 1) 06:00	0	0	1	0	1	0

Hour beginning	Trinity Street, Halstead	Braintree Village rank, Bus stops	Station Approach, Braintree	Rayne Road, Braintree	Manor Street, Braintree	Albert Road, Witham (Station)
Thursday (week 1) 07:00	0	0	1	0	0	1
Thursday (week 1) 08:00	0	0	1	0	1	0
Thursday (week 1) 09:00	0	0	0	0	2	0
Thursday (week 1) 10:00	0	0	0	0	6	4
Thursday (week 1) 11:00	0	0	0	0	2	1
Thursday (week 1) 12:00	0	0	0	0	1	1
Thursday (week 1) 13:00	0	0	0	0	2	1
Thursday (week 1) 14:00	0	0	0	0	1	0
Thursday (week 1) 15:00	0	0	0	0	2	2
Thursday (week 1) 16:00	0	0	0	0	2	0
Thursday (week 1) 17:00	0	0	0	0	2	0
Thursday (week 1) 18:00	0	0	0	0	2	0
Thursday (week 1) 19:00	0	0	0	0	1	1
Thursday (week 1) 20:00	0	0	0	0	3	4
Thursday (week 1) 21:00	0	0	0	0	1	1
Thursday (week 1) 22:00	0	0	0	0	1	0
Thursday (week 1) 23:00	0	0	0	0	3	1
Friday (week 1) 00:00	0	0	0	0	1	0
Friday (week 1) 01:00	0	0	0	0	0	3
Friday (week 1) 02:00	0	0	0	0	0	0
Friday (week 1) 03:00	0	0	0	0	0	0
Friday (week 1) 04:00	0	0	0	0	0	0
Friday (week 1) 05:00	0	0	0	0	0	0
Friday (week 1) 06:00	0	0	0	0	1	0
Friday (week 1) 07:00	0	0	0	0	1	2
Friday (week 1) 08:00	0	0	0	0	0	3
Friday (week 1) 09:00	0	0	0	0	1	2
Friday (week 1) 10:00	0	0	0	0	0	3
Friday (week 1) 11:00	0	0	1	0	1	1
Friday (week 1) 12:00	0	0	1	0	1	0
Friday (week 1) 13:00	0	0	0	0	2	0
Friday (week 1) 14:00	0	0	0	0	4	0
Friday (week 1) 15:00	0	0	0	0	2	2
Friday (week 1) 16:00	0	0	0	0	0	1
Friday (week 1) 17:00	0	0	0	0	0	2
Friday (week 1) 18:00	0	0	0	0	0	1
Friday (week 1) 19:00	0	0	0	0	3	0
Friday (week 1) 20:00	0	0	0	0	1	4
Friday (week 1) 21:00	0	0	1	0	4	1
Friday (week 1) 22:00	0	0	0	0	4	2
Friday (week 1) 23:00	0	0	0	0	1	0
Saturday (week 1) 00:00	0	0	0	0	3	1
Saturday (week 1) 01:00	0	0	0	0	6	0
Saturday (week 1) 02:00	0	0	0	0	2	0
Saturday (week 1) 03:00	0	0	0	0	0	0
Saturday (week 1) 04:00	0	0	0	0	0	0
Saturday (week 1) 05:00	0	0	0	0	0	0
Saturday (week 1) 06:00	0	0	0	0	0	0

Hour beginning	Trinity Street, Halstead	Braintree Village rank, Bus stops	Station Approach, Braintree	Rayne Road, Braintree	Manor Street, Braintree	Albert Road, Witham (Station)
Saturday (week 1) 07:00	0	0	0	0	1	0
Saturday (week 1) 08:00	0	0	1	0	0	1
Saturday (week 1) 09:00	0	0	0	0	2	1
Saturday (week 1) 10:00	0	0	0	0	1	0
Saturday (week 1) 11:00	0	0	0	0	0	0
Saturday (week 1) 12:00	0	0	0	0	1	0
Saturday (week 1) 13:00	0	0	1	0	1	0
Saturday (week 1) 14:00	0	0	0	0	2	0
Saturday (week 1) 15:00	0	0	0	0	3	1
Saturday (week 1) 16:00	0	0	1	0	2	1
Saturday (week 1) 17:00	0	0	0	0	5	0
Saturday (week 1) 18:00	0	0	0	0	1	0
Saturday (week 1) 19:00	0	0	0	0	9	1
Saturday (week 1) 20:00	0	0	0	0	5	0
Saturday (week 1) 21:00	0	0	0	0	3	0
Saturday (week 1) 22:00	0	0	1	0	4	3
Saturday (week 1) 23:00	0	0	0	0	1	0
Sunday (week 2) 00:00	0	0	0	0	3	1
Sunday (week 2) 01:00	0	0	0	0	0	5
Sunday (week 2) 02:00	0	0	0	0	4	0
Sunday (week 2) 03:00	0	0	0	0	1	0
Sunday (week 2) 04:00	0	0	0	0	0	0
Sunday (week 2) 05:00	0	0	0	0	0	0
Sunday (week 2) 06:00	0	0	0	0	0	0
Sunday (week 2) 07:00	0	0	1	0	0	0
Sunday (week 2) 08:00	0	0	0	0	0	0
Sunday (week 2) 09:00	0	0	1	0	2	0
Sunday (week 2) 10:00	0	0	1	0	3	0
Sunday (week 2) 11:00	0	0	0	0	1	0
Sunday (week 2) 12:00	0	0	2	0	3	2
Sunday (week 2) 13:00	0	0	1	1	3	0
Sunday (week 2) 14:00	0	0	0	0	4	1
Sunday (week 2) 15:00	0	0	0	0	0	0
Sunday (week 2) 16:00	0	0	0	0	1	0
Sunday (week 2) 17:00	0	0	1	0	4	0
Sunday (week 2) 18:00	0	0	0	0	1	0
Sunday (week 2) 19:00	0	0	1	0	1	0
Sunday (week 2) 20:00	0	0	1	0	2	1
Sunday (week 2) 21:00	0	0	0	0	4	3
Sunday (week 2) 22:00	0	0	0	0	2	1
Sunday (week 2) 23:00	0	0	0	0	1	0
Monday (week 2) 00:00	0	0	0	0	0	0
Monday (week 2) 01:00	0	0	0	0	0	0
Monday (week 2) 02:00	0	0	0	0	0	0
Monday (week 2) 03:00	0	0	0	0	0	0
Monday (week 2) 04:00	0	0	0	0	0	0
Monday (week 2) 05:00	0	0	0	0	0	0
Monday (week 2) 06:00	0	0	1	0	1	0

Hour beginning	Trinity Street, Halstead	Braintree Village rank, Bus stops	Station Approach, Braintree	Rayne Road, Braintree	Manor Street, Braintree	Albert Road, Witham (Station)
Monday (week 2) 07:00	0	0	0	0	0	2
Monday (week 2) 08:00	0	0	1	0	2	0
Monday (week 2) 09:00	0	0	2	0	2	1
Monday (week 2) 10:00	0	0	0	0	3	2
Monday (week 2) 11:00	0	0	0	0	1	1
Monday (week 2) 12:00	0	0	1	0	3	1
Monday (week 2) 13:00	0	0	2	0	1	0
Monday (week 2) 14:00	0	0	0	0	4	1
Monday (week 2) 15:00	0	0	0	0	1	0
Monday (week 2) 16:00	0	0	1	0	4	0
Monday (week 2) 17:00	0	0	0	0	1	1
Monday (week 2) 18:00	0	0	0	0	0	0
Monday (week 2) 19:00	0	0	0	0	1	4
Monday (week 2) 20:00	0	0	1	0	2	0
Monday (week 2) 21:00	0	0	0	0	0	3
Monday (week 2) 22:00	0	0	0	0	0	0
Monday (week 2) 23:00	0	0	1	0	1	0
Tuesday (week 2) 00:00	0	0	2	0	0	1
Tuesday (week 2) 01:00	0	0	0	0	0	0
Tuesday (week 2) 02:00	0	0	0	0	0	0
Tuesday (week 2) 03:00	0	0	0	0	0	0
Tuesday (week 2) 04:00	0	0	0	0	0	0
Tuesday (week 2) 05:00	0	0	0	0	0	0
Tuesday (week 2) 06:00	0	0	1	0	1	0
Tuesday (week 2) 07:00	0	0	0	0	1	0
Tuesday (week 2) 08:00	0	0	0	0	0	0
Tuesday (week 2) 09:00	0	0	0	0	1	1
Tuesday (week 2) 10:00	0	0	1	0	2	2
Tuesday (week 2) 11:00	0	0	0	0	3	0
Tuesday (week 2) 12:00	0	0	1	0	2	0
Tuesday (week 2) 13:00	0	0	0	0	1	0
Tuesday (week 2) 14:00	0	0	0	0	4	2
Tuesday (week 2) 15:00	0	0	1	0	1	0
Tuesday (week 2) 16:00	0	0	0	0	1	1
Tuesday (week 2) 17:00	0	0	2	0	0	1
Tuesday (week 2) 18:00	2	0	1	0	4	0
Tuesday (week 2) 19:00	0	0	0	0	2	1
Tuesday (week 2) 20:00	0	0	2	0	5	1
Tuesday (week 2) 21:00	0	0	0	0	2	0
Tuesday (week 2) 22:00	0	0	0	0	1	0
Tuesday (week 2) 23:00	0	0	0	0	1	0
Wednesday (week 2) 00:00	0	0	0	0	1	0
Wednesday (week 2) 01:00	0	0	0	0	0	5
Wednesday (week 2) 02:00	0	0	0	0	0	0
Wednesday (week 2) 03:00	0	0	0	0	0	0
Wednesday (week 2) 04:00	0	0	0	0	0	0
Wednesday (week 2) 05:00	0	0	0	0	0	0
Wednesday (week 2) 06:00	0	0	0	0	4	2

Hour beginning	Trinity Street, Halstead	Braintree Village rank, Bus stops	Station Approach, Braintree	Rayne Road, Braintree	Manor Street, Braintree	Albert Road, Witham (Station)
Wednesday (week 2) 07:00	0	0	0	0	2	0
Wednesday (week 2) 08:00	0	0	1	0	3	1
Wednesday (week 2) 09:00	0	0	2	0	0	1
Wednesday (week 2) 10:00	0	0	0	1	1	1
Wednesday (week 2) 11:00	0	0	0	0	1	2
Wednesday (week 2) 12:00	0	0	0	0	3	1
Wednesday (week 2) 13:00	0	1	0	1	1	2
Wednesday (week 2) 14:00	0	0	0	0	0	1
Wednesday (week 2) 15:00	0	0	0	0	0	0
Wednesday (week 2) 16:00	0	0	0	0	0	1
Wednesday (week 2) 17:00	0	0	0	0	0	0
Wednesday (week 2) 18:00	0	0	0	0	0	0
Wednesday (week 2) 19:00	1	0	0	0	1	0
Wednesday (week 2) 20:00	0	0	0	0	0	0
Wednesday (week 2) 21:00	0	0	0	0	3	0
Wednesday (week 2) 22:00	0	0	0	0	2	0
Wednesday (week 2) 23:00	0	0	0	0	0	0
Thursday (week 2) 00:00	0	0	0	0	0	2
Thursday (week 2) 01:00	0	0	0	0	0	0
Thursday (week 2) 02:00	0	0	0	0	0	0
Thursday (week 2) 03:00	0	0	0	0	0	0
Thursday (week 2) 04:00	0	0	0	0	0	0
Thursday (week 2) 05:00	0	0	0	0	0	0
Thursday (week 2) 06:00	0	0	0	0	0	2
Thursday (week 2) 07:00	0	0	0	0	1	1
Thursday (week 2) 08:00	0	0	1	0	0	3
Thursday (week 2) 09:00	0	0	1	0	5	0
Thursday (week 2) 10:00	0	0	0	0	3	0
Thursday (week 2) 11:00	0	0	0	0	4	0
Thursday (week 2) 12:00	0	0	1	0	6	1
Thursday (week 2) 13:00	0	0	1	0	6	2
Thursday (week 2) 14:00	0	0	0	1	1	1
Thursday (week 2) 15:00	0	0	1	0	0	0
Thursday (week 2) 16:00	0	0	0	0	2	1
Thursday (week 2) 17:00	0	0	0	0	0	1
Thursday (week 2) 18:00	0	0	1	0	3	0
Thursday (week 2) 19:00	0	0	1	0	6	0
Thursday (week 2) 20:00	0	0	2	0	0	3
Thursday (week 2) 21:00	0	0	0	0	0	0
Thursday (week 2) 22:00	0	0	0	0	1	0
Thursday (week 2) 23:00	0	0	1	0	0	0
Friday (week 2) 00:00	0	0	0	0	0	0
Friday (week 2) 01:00	0	0	0	0	0	1
Friday (week 2) 02:00	0	0	0	0	1	0
Friday (week 2) 03:00	0	0	0	0	0	0
Friday (week 2) 04:00	0	0	0	0	0	0
Friday (week 2) 05:00	0	0	0	0	0	0
Friday (week 2) 06:00	0	0	0	0	1	0

Hour beginning	Trinity Street, Halstead	Braintree Village rank, Bus stops	Station Approach, Braintree	Rayne Road, Braintree	Manor Street, Braintree	Albert Road, Witham (Station)
Friday (week 2) 07:00	0	0	0	0	2	1
Friday (week 2) 08:00	0	0	0	0	0	3
Friday (week 2) 09:00	0	0	0	0	3	1
Friday (week 2) 10:00	0	0	1	0	3	3
Friday (week 2) 11:00	0	0	1	0	1	2
Friday (week 2) 12:00	0	0	1	0	8	0
Friday (week 2) 13:00	0	0	1	0	1	0
Friday (week 2) 14:00	0	0	1	0	0	0
Friday (week 2) 15:00	0	0	1	0	0	1
Friday (week 2) 16:00	0	0	0	0	0	0
Friday (week 2) 17:00	0	0	1	0	0	0
Friday (week 2) 18:00	0	0	0	0	1	2
Friday (week 2) 19:00	0	0	0	0	3	2
Friday (week 2) 20:00	0	0	0	0	4	0
Friday (week 2) 21:00	0	0	0	0	3	2
Friday (week 2) 22:00	0	0	0	0	5	1
Friday (week 2) 23:00	1	0	0	0	0	2
Saturday (week 2) 00:00	0	0	0	0	3	0
Saturday (week 2) 01:00	0	0	0	0	4	0
Saturday (week 2) 02:00	0	0	0	0	5	1
Saturday (week 2) 03:00	0	0	0	0	4	0
Saturday (week 2) 04:00	0	0	0	0	1	0
Saturday (week 2) 05:00	0	0	0	0	0	0
Saturday (week 2) 06:00	0	0	0	0	0	0
Saturday (week 2) 07:00	0	0	0	0	0	0
Saturday (week 2) 08:00	0	0	0	0	1	0
Saturday (week 2) 09:00	0	0	0	0	0	0
Saturday (week 2) 10:00	0	0	0	0	0	0
Saturday (week 2) 11:00	0	0	0	0	0	0
Saturday (week 2) 12:00	0	0	0	0	0	0
Saturday (week 2) 13:00	0	0	0	0	0	0
Saturday (week 2) 14:00	0	0	0	1	2	0
Saturday (week 2) 15:00	0	0	0	0	1	0
Saturday (week 2) 16:00	0	0	0	0	6	2
Saturday (week 2) 17:00	0	0	1	0	6	2
Saturday (week 2) 18:00	0	0	0	0	7	3
Saturday (week 2) 19:00	0	0	0	0	6	0
Saturday (week 2) 20:00	0	0	1	0	6	1
Saturday (week 2) 21:00	0	0	0	0	6	1
Saturday (week 2) 22:00	0	0	0	0	1	2
Saturday (week 2) 23:00	0	0	0	0	1	0
Sunday (week 3) 00:00	1	0	0	0	0	0
Sunday (week 3) 01:00	0	0	0	0	1	0
Sunday (week 3) 02:00	0	0	0	0	1	0
Sunday (week 3) 03:00	0	0	0	0	5	0
Sunday (week 3) 04:00	0	0	0	0	0	0
Sunday (week 3) 05:00	0	0	0	0	0	0
Sunday (week 3) 06:00	0	0	0	0	0	0

APPENDIX C – HOURLY HACKNEY CARRIAGES LEAVING RANKS WITH PASSENGERS

Hour beginning	Trinity Street, Halstead	Braintree Village rank, Bus stops	Station Approach, Braintree	Rayne Road, Braintree	Manor Street, Braintree	Albert Road, Witham (Station)
Sunday (week 1) 07:00	0	0	0	0	0	0
Sunday (week 1) 08:00	0	0	0	0	1	0
Sunday (week 1) 09:00	0	0	0	0	1	0
Sunday (week 1) 10:00	0	0	2	0	2	1
Sunday (week 1) 11:00	0	0	1	0	3	1
Sunday (week 1) 12:00	0	0	0	0	10	0
Sunday (week 1) 13:00	0	0	0	0	8	3
Sunday (week 1) 14:00	0	0	0	0	7	4
Sunday (week 1) 15:00	0	0	0	0	1	4
Sunday (week 1) 16:00	0	0	0	0	7	4
Sunday (week 1) 17:00	0	0	0	0	7	3
Sunday (week 1) 18:00	0	0	0	0	6	5
Sunday (week 1) 19:00	0	0	0	0	0	4
Sunday (week 1) 20:00	0	0	1	0	0	8
Sunday (week 1) 21:00	0	0	0	0	2	4
Sunday (week 1) 22:00	0	0	0	0	2	6
Sunday (week 1) 23:00	0	0	1	0	0	1
Monday (week 1) 00:00	0	0	0	0	0	6
Monday (week 1) 01:00	0	0	0	0	0	0
Monday (week 1) 02:00	0	0	0	0	0	0
Monday (week 1) 03:00	0	0	0	0	0	0
Monday (week 1) 04:00	0	0	0	0	0	0
Monday (week 1) 05:00	0	0	0	0	0	0
Monday (week 1) 06:00	0	0	0	0	1	0
Monday (week 1) 07:00	0	0	0	0	1	0
Monday (week 1) 08:00	0	0	1	0	4	2
Monday (week 1) 09:00	0	0	0	0	6	4
Monday (week 1) 10:00	0	0	0	0	14	4
Monday (week 1) 11:00	0	0	1	0	8	2
Monday (week 1) 12:00	0	0	1	0	15	4
Monday (week 1) 13:00	0	0	1	0	10	2
Monday (week 1) 14:00	0	0	0	0	10	6
Monday (week 1) 15:00	0	0	0	0	9	8
Monday (week 1) 16:00	0	0	0	0	7	2
Monday (week 1) 17:00	0	0	0	0	7	10
Monday (week 1) 18:00	0	0	0	0	6	8
Monday (week 1) 19:00	0	0	0	0	7	9
Monday (week 1) 20:00	0	0	0	0	2	2
Monday (week 1) 21:00	0	0	0	0	3	6
Monday (week 1) 22:00	0	0	0	0	0	15
Monday (week 1) 23:00	0	0	1	0	1	8
Tuesday (week 1) 00:00	0	0	1	0	1	6
Tuesday (week 1) 01:00	0	0	0	0	0	3
Tuesday (week 1) 02:00	0	0	0	0	0	0
Tuesday (week 1) 03:00	0	0	0	0	0	0
Tuesday (week 1) 04:00	0	0	0	0	0	0
Tuesday (week 1) 05:00	0	0	0	0	0	0
Tuesday (week 1) 06:00	0	0	0	0	0	0

Hour beginning	Trinity Street, Halstead	Braintree Village rank, Bus stops	Station Approach, Braintree	Rayne Road, Braintree	Manor Street, Braintree	Albert Road, Witham (Station)
Tuesday (week 1) 07:00	0	0	0	0	0	1
Tuesday (week 1) 08:00	0	0	0	0	3	2
Tuesday (week 1) 09:00	0	0	1	0	9	9
Tuesday (week 1) 10:00	0	0	1	0	4	4
Tuesday (week 1) 11:00	0	0	0	0	9	2
Tuesday (week 1) 12:00	0	0	1	0	11	0
Tuesday (week 1) 13:00	0	0	0	0	12	5
Tuesday (week 1) 14:00	0	0	0	0	11	6
Tuesday (week 1) 15:00	0	0	0	0	11	1
Tuesday (week 1) 16:00	0	0	1	0	8	9
Tuesday (week 1) 17:00	0	0	0	0	10	11
Tuesday (week 1) 18:00	0	1	0	0	7	15
Tuesday (week 1) 19:00	0	0	1	0	2	7
Tuesday (week 1) 20:00	0	0	0	0	3	13
Tuesday (week 1) 21:00	0	0	0	0	0	7
Tuesday (week 1) 22:00	0	0	1	0	2	15
Tuesday (week 1) 23:00	0	0	0	0	1	16
Wednesday (week 1) 00:00	0	0	0	0	0	9
Wednesday (week 1) 01:00	0	0	0	0	0	0
Wednesday (week 1) 02:00	0	0	0	0	0	0
Wednesday (week 1) 03:00	0	0	0	0	0	0
Wednesday (week 1) 04:00	0	0	0	0	0	0
Wednesday (week 1) 05:00	0	0	0	0	0	0
Wednesday (week 1) 06:00	0	0	0	0	1	0
Wednesday (week 1) 07:00	0	0	0	0	3	0
Wednesday (week 1) 08:00	0	0	0	0	2	0
Wednesday (week 1) 09:00	0	0	1	0	6	3
Wednesday (week 1) 10:00	0	0	0	0	5	2
Wednesday (week 1) 11:00	0	0	1	0	10	3
Wednesday (week 1) 12:00	0	0	0	0	19	4
Wednesday (week 1) 13:00	0	0	0	0	17	2
Wednesday (week 1) 14:00	0	0	1	0	15	2
Wednesday (week 1) 15:00	0	0	0	0	5	2
Wednesday (week 1) 16:00	0	0	1	0	9	3
Wednesday (week 1) 17:00	0	0	0	0	13	6
Wednesday (week 1) 18:00	0	0	1	0	6	12
Wednesday (week 1) 19:00	1	0	0	0	1	16
Wednesday (week 1) 20:00	0	0	1	0	3	13
Wednesday (week 1) 21:00	0	0	1	0	0	19
Wednesday (week 1) 22:00	0	0	0	0	1	16
Wednesday (week 1) 23:00	0	0	0	0	2	20
Thursday (week 1) 00:00	0	0	0	0	0	9
Thursday (week 1) 01:00	0	0	0	0	0	3
Thursday (week 1) 02:00	0	0	0	0	0	0
Thursday (week 1) 03:00	0	0	0	0	0	0
Thursday (week 1) 04:00	0	0	0	0	0	0
Thursday (week 1) 05:00	0	0	0	0	0	0
Thursday (week 1) 06:00	0	0	0	0	0	0

Hour beginning	Trinity Street, Halstead	Braintree Village rank, Bus stops	Station Approach, Braintree	Rayne Road, Braintree	Manor Street, Braintree	Albert Road, Witham (Station)
Thursday (week 1) 07:00	0	0	0	0	1	1
Thursday (week 1) 08:00	0	0	1	0	2	1
Thursday (week 1) 09:00	0	0	1	0	5	2
Thursday (week 1) 10:00	0	0	0	0	9	1
Thursday (week 1) 11:00	0	0	0	0	10	3
Thursday (week 1) 12:00	0	0	2	0	13	0
Thursday (week 1) 13:00	0	0	1	0	16	0
Thursday (week 1) 14:00	0	0	3	0	13	3
Thursday (week 1) 15:00	0	0	0	0	9	2
Thursday (week 1) 16:00	0	0	1	1	14	8
Thursday (week 1) 17:00	0	0	1	0	11	11
Thursday (week 1) 18:00	0	0	0	0	6	12
Thursday (week 1) 19:00	0	0	1	0	6	9
Thursday (week 1) 20:00	0	0	1	0	3	8
Thursday (week 1) 21:00	0	0	0	0	2	19
Thursday (week 1) 22:00	0	0	1	0	3	30
Thursday (week 1) 23:00	0	0	2	0	0	41
Friday (week 1) 00:00	0	0	1	0	1	33
Friday (week 1) 01:00	0	0	0	0	0	18
Friday (week 1) 02:00	0	0	0	0	1	0
Friday (week 1) 03:00	0	0	0	0	0	0
Friday (week 1) 04:00	0	0	0	0	0	0
Friday (week 1) 05:00	0	0	0	0	0	0
Friday (week 1) 06:00	0	0	0	0	1	0
Friday (week 1) 07:00	0	0	0	0	2	0
Friday (week 1) 08:00	0	0	0	0	3	1
Friday (week 1) 09:00	0	0	0	0	6	2
Friday (week 1) 10:00	0	0	0	0	12	0
Friday (week 1) 11:00	0	0	0	0	19	4
Friday (week 1) 12:00	0	0	1	2	10	3
Friday (week 1) 13:00	0	0	1	0	14	3
Friday (week 1) 14:00	0	0	0	0	13	6
Friday (week 1) 15:00	0	0	0	0	8	9
Friday (week 1) 16:00	0	0	0	0	14	6
Friday (week 1) 17:00	0	0	0	0	17	7
Friday (week 1) 18:00	0	0	2	0	13	12
Friday (week 1) 19:00	0	0	2	0	12	13
Friday (week 1) 20:00	0	0	1	0	8	8
Friday (week 1) 21:00	0	0	0	0	10	9
Friday (week 1) 22:00	0	0	0	0	12	13
Friday (week 1) 23:00	0	0	1	0	18	15
Saturday (week 1) 00:00	0	0	0	0	15	13
Saturday (week 1) 01:00	0	0	0	0	25	10
Saturday (week 1) 02:00	0	0	0	0	15	0
Saturday (week 1) 03:00	0	0	0	0	6	0
Saturday (week 1) 04:00	0	0	0	0	1	0
Saturday (week 1) 05:00	0	0	0	0	0	0
Saturday (week 1) 06:00	0	0	0	0	0	0

Hour beginning	Trinity Street, Halstead	Braintree Village rank, Bus stops	Station Approach, Braintree	Rayne Road, Braintree	Manor Street, Braintree	Albert Road, Witham (Station)
Saturday (week 1) 07:00	0	0	0	0	1	0
Saturday (week 1) 08:00	0	0	0	0	3	0
Saturday (week 1) 09:00	0	0	1	0	5	1
Saturday (week 1) 10:00	0	0	0	0	6	0
Saturday (week 1) 11:00	0	0	3	0	8	6
Saturday (week 1) 12:00	0	0	1	0	13	3
Saturday (week 1) 13:00	0	0	1	0	13	5
Saturday (week 1) 14:00	0	0	0	0	18	4
Saturday (week 1) 15:00	0	0	0	0	11	6
Saturday (week 1) 16:00	0	0	0	0	11	9
Saturday (week 1) 17:00	0	0	0	0	12	9
Saturday (week 1) 18:00	0	0	0	0	9	10
Saturday (week 1) 19:00	0	0	0	0	4	5
Saturday (week 1) 20:00	0	0	2	0	6	12
Saturday (week 1) 21:00	0	0	2	0	8	14
Saturday (week 1) 22:00	0	0	1	0	7	10
Saturday (week 1) 23:00	0	0	0	0	14	21
Sunday (week 2) 00:00	0	0	0	0	9	22
Sunday (week 2) 01:00	0	0	0	0	19	7
Sunday (week 2) 02:00	0	0	0	0	13	0
Sunday (week 2) 03:00	0	0	0	0	2	0
Sunday (week 2) 04:00	0	0	0	0	0	0
Sunday (week 2) 05:00	0	0	0	0	0	0
Sunday (week 2) 06:00	0	0	0	0	0	0
Sunday (week 2) 07:00	0	0	0	0	2	0
Sunday (week 2) 08:00	0	0	0	0	2	0
Sunday (week 2) 09:00	0	0	0	0	1	0
Sunday (week 2) 10:00	0	0	0	0	0	2
Sunday (week 2) 11:00	0	0	0	0	6	1
Sunday (week 2) 12:00	0	0	0	0	9	2
Sunday (week 2) 13:00	0	0	1	0	6	5
Sunday (week 2) 14:00	0	0	1	0	5	4
Sunday (week 2) 15:00	0	0	1	0	8	5
Sunday (week 2) 16:00	0	0	0	0	8	5
Sunday (week 2) 17:00	0	0	0	0	4	4
Sunday (week 2) 18:00	0	0	0	0	1	3
Sunday (week 2) 19:00	0	0	0	0	3	3
Sunday (week 2) 20:00	0	0	0	0	3	5
Sunday (week 2) 21:00	0	0	0	0	5	1
Sunday (week 2) 22:00	0	0	0	0	3	8
Sunday (week 2) 23:00	0	0	0	0	4	5
Monday (week 2) 00:00	0	0	0	0	0	8
Monday (week 2) 01:00	0	0	0	0	0	0
Monday (week 2) 02:00	0	0	0	0	0	0
Monday (week 2) 03:00	0	0	0	0	0	0
Monday (week 2) 04:00	0	0	0	0	0	0
Monday (week 2) 05:00	0	0	0	0	1	0
Monday (week 2) 06:00	0	0	0	0	0	0

Hour beginning	Trinity Street, Halstead	Braintree Village rank, Bus stops	Station Approach, Braintree	Rayne Road, Braintree	Manor Street, Braintree	Albert Road, Witham (Station)
Monday (week 2) 07:00	0	0	0	0	4	1
Monday (week 2) 08:00	0	0	2	0	5	1
Monday (week 2) 09:00	0	0	0	0	9	1
Monday (week 2) 10:00	0	0	1	0	11	1
Monday (week 2) 11:00	0	0	2	0	6	2
Monday (week 2) 12:00	0	0	2	0	10	3
Monday (week 2) 13:00	0	0	1	0	14	2
Monday (week 2) 14:00	0	0	0	0	6	1
Monday (week 2) 15:00	0	0	0	0	14	4
Monday (week 2) 16:00	0	0	0	0	13	3
Monday (week 2) 17:00	0	0	0	0	11	2
Monday (week 2) 18:00	0	0	1	0	7	4
Monday (week 2) 19:00	0	0	1	0	8	10
Monday (week 2) 20:00	0	0	0	0	1	6
Monday (week 2) 21:00	0	0	0	0	4	2
Monday (week 2) 22:00	0	0	0	0	3	10
Monday (week 2) 23:00	0	0	1	0	0	7
Tuesday (week 2) 00:00	0	0	0	0	0	4
Tuesday (week 2) 01:00	0	0	0	0	0	3
Tuesday (week 2) 02:00	0	0	0	0	0	0
Tuesday (week 2) 03:00	0	0	0	0	0	0
Tuesday (week 2) 04:00	0	0	0	0	0	0
Tuesday (week 2) 05:00	0	0	0	0	0	0
Tuesday (week 2) 06:00	0	0	0	0	0	0
Tuesday (week 2) 07:00	0	0	0	0	1	0
Tuesday (week 2) 08:00	0	0	0	0	1	1
Tuesday (week 2) 09:00	0	0	0	0	5	2
Tuesday (week 2) 10:00	0	0	1	0	6	2
Tuesday (week 2) 11:00	0	0	1	0	11	5
Tuesday (week 2) 12:00	0	0	0	0	8	2
Tuesday (week 2) 13:00	0	0	1	0	12	1
Tuesday (week 2) 14:00	0	0	0	0	13	3
Tuesday (week 2) 15:00	0	0	0	0	11	4
Tuesday (week 2) 16:00	0	0	0	0	14	3
Tuesday (week 2) 17:00	0	0	0	0	7	4
Tuesday (week 2) 18:00	0	0	0	0	5	9
Tuesday (week 2) 19:00	0	0	0	0	6	14
Tuesday (week 2) 20:00	0	0	1	0	2	7
Tuesday (week 2) 21:00	0	0	0	0	1	10
Tuesday (week 2) 22:00	0	0	0	0	1	15
Tuesday (week 2) 23:00	0	0	0	0	3	14
Wednesday (week 2) 00:00	0	0	0	0	0	11
Wednesday (week 2) 01:00	0	0	0	0	0	1
Wednesday (week 2) 02:00	0	0	0	0	0	0
Wednesday (week 2) 03:00	0	0	0	0	0	0
Wednesday (week 2) 04:00	0	0	0	0	0	0
Wednesday (week 2) 05:00	0	0	0	0	0	0
Wednesday (week 2) 06:00	0	0	0	0	0	0

Hour beginning	Trinity Street, Halstead	Braintree Village rank, Bus stops	Station Approach, Braintree	Rayne Road, Braintree	Manor Street, Braintree	Albert Road, Witham (Station)
Wednesday (week 2) 07:00	0	0	0	0	2	2
Wednesday (week 2) 08:00	0	0	0	0	1	2
Wednesday (week 2) 09:00	0	0	0	0	10	2
Wednesday (week 2) 10:00	0	0	0	0	9	4
Wednesday (week 2) 11:00	0	0	1	0	12	5
Wednesday (week 2) 12:00	0	0	0	0	9	3
Wednesday (week 2) 13:00	0	0	1	0	3	6
Wednesday (week 2) 14:00	0	0	3	0	9	3
Wednesday (week 2) 15:00	0	0	1	0	10	7
Wednesday (week 2) 16:00	0	0	0	0	3	7
Wednesday (week 2) 17:00	0	0	0	0	4	10
Wednesday (week 2) 18:00	0	0	0	0	1	8
Wednesday (week 2) 19:00	0	0	0	0	0	11
Wednesday (week 2) 20:00	0	0	0	0	0	12
Wednesday (week 2) 21:00	0	0	0	0	2	19
Wednesday (week 2) 22:00	0	0	0	0	1	17
Wednesday (week 2) 23:00	0	0	0	0	0	18
Thursday (week 2) 00:00	0	0	0	0	0	14
Thursday (week 2) 01:00	0	0	0	0	0	8
Thursday (week 2) 02:00	0	0	0	0	0	1
Thursday (week 2) 03:00	0	0	0	0	0	0
Thursday (week 2) 04:00	0	0	0	0	0	0
Thursday (week 2) 05:00	0	0	0	0	0	0
Thursday (week 2) 06:00	0	0	0	0	0	1
Thursday (week 2) 07:00	0	0	0	0	2	0
Thursday (week 2) 08:00	0	0	0	0	3	2
Thursday (week 2) 09:00	0	0	0	0	5	3
Thursday (week 2) 10:00	0	0	1	0	5	1
Thursday (week 2) 11:00	0	0	1	0	10	4
Thursday (week 2) 12:00	0	0	0	0	10	2
Thursday (week 2) 13:00	0	0	1	0	11	5
Thursday (week 2) 14:00	0	0	0	0	7	1
Thursday (week 2) 15:00	0	0	0	0	10	1
Thursday (week 2) 16:00	0	0	0	0	8	4
Thursday (week 2) 17:00	0	0	0	0	3	10
Thursday (week 2) 18:00	0	0	0	0	5	14
Thursday (week 2) 19:00	0	0	1	0	2	14
Thursday (week 2) 20:00	0	0	0	0	3	14
Thursday (week 2) 21:00	0	0	1	0	3	13
Thursday (week 2) 22:00	0	0	0	0	1	26
Thursday (week 2) 23:00	0	0	1	0	2	25
Friday (week 2) 00:00	0	0	2	0	1	23
Friday (week 2) 01:00	0	0	0	0	0	20
Friday (week 2) 02:00	0	0	0	0	0	0
Friday (week 2) 03:00	0	0	0	0	0	0
Friday (week 2) 04:00	0	0	0	0	0	0
Friday (week 2) 05:00	0	0	0	0	1	0
Friday (week 2) 06:00	0	0	0	0	0	0

Hour beginning	Trinity Street, Halstead	Braintree Village rank, Bus stops	Station Approach, Braintree	Rayne Road, Braintree	Manor Street, Braintree	Albert Road, Witham (Station)
Friday (week 2) 07:00	0	0	0	0	2	1
Friday (week 2) 08:00	0	0	2	0	5	1
Friday (week 2) 09:00	0	0	0	0	9	2
Friday (week 2) 10:00	0	0	0	0	10	2
Friday (week 2) 11:00	0	0	0	0	22	3
Friday (week 2) 12:00	0	0	3	0	15	3
Friday (week 2) 13:00	0	0	1	0	12	1
Friday (week 2) 14:00	0	0	1	0	6	7
Friday (week 2) 15:00	0	0	1	0	10	5
Friday (week 2) 16:00	0	0	0	0	15	8
Friday (week 2) 17:00	0	0	0	0	15	6
Friday (week 2) 18:00	0	0	0	0	6	18
Friday (week 2) 19:00	0	0	0	0	12	10
Friday (week 2) 20:00	0	1	1	0	10	13
Friday (week 2) 21:00	0	0	0	0	5	9
Friday (week 2) 22:00	0	0	0	0	6	22
Friday (week 2) 23:00	0	0	0	0	21	26
Saturday (week 2) 00:00	0	0	1	0	19	20
Saturday (week 2) 01:00	0	0	0	0	20	17
Saturday (week 2) 02:00	0	0	0	0	18	0
Saturday (week 2) 03:00	0	0	0	0	3	0
Saturday (week 2) 04:00	0	0	0	0	0	0
Saturday (week 2) 05:00	0	0	0	0	0	0
Saturday (week 2) 06:00	0	0	0	0	0	0
Saturday (week 2) 07:00	0	0	0	0	0	0
Saturday (week 2) 08:00	0	0	0	0	0	0
Saturday (week 2) 09:00	0	0	0	0	4	0
Saturday (week 2) 10:00	0	0	0	0	6	0
Saturday (week 2) 11:00	0	0	0	0	7	7
Saturday (week 2) 12:00	0	0	2	0	10	5
Saturday (week 2) 13:00	0	0	0	0	14	3
Saturday (week 2) 14:00	0	0	1	0	13	2
Saturday (week 2) 15:00	0	0	3	0	23	3
Saturday (week 2) 16:00	0	0	2	0	12	5
Saturday (week 2) 17:00	0	0	0	0	15	8
Saturday (week 2) 18:00	0	0	2	0	13	7
Saturday (week 2) 19:00	0	0	2	0	5	5
Saturday (week 2) 20:00	0	0	1	0	3	5
Saturday (week 2) 21:00	0	0	0	0	8	8
Saturday (week 2) 22:00	0	0	0	0	6	3
Saturday (week 2) 23:00	0	0	0	0	12	6
Sunday (week 3) 00:00	0	0	0	0	13	3
Sunday (week 3) 01:00	1	0	0	0	16	1
Sunday (week 3) 02:00	0	0	0	0	17	0
Sunday (week 3) 03:00	0	0	0	0	12	0
Sunday (week 3) 04:00	0	0	0	0	0	0
Sunday (week 3) 05:00	0	0	0	0	0	0
Sunday (week 3) 06:00	0	0	0	0	1	0

Report Title: Licensing Committee Update	
Report to: Licensing Committee	
Date: 25 th January 2024	For: Noting
Key Decision: No	Decision Planner Ref No: N/A
Report Presented by: John Meddings (Principal Licensing Officer)	
Enquiries to: John Meddings (Principal Licensing Officer) EM: John.meddings@braintree.gov.uk	

1. Purpose of the Report

- 1.1 Members of the Licensing Committee have requested regular updates on applications determined by Licensing Sub-Committees and Drivers Panel. A summary of all applications determined since the last report submitted to the Committee on 14th September 2023 is provided below.
- 1.2 The report will also highlight other significant issues relevant to licensing.

2. Recommendations

- 2.1 The report is for information only and Members are only required to note the content.

3. Licensing Applications - Licensing Act 2003

- 3.1 The Licensing Sub-Committee determined an application for a Premises Licence for Bakealicious, Market Hill, Church Lane, Coggeshall. A Premises Licence was granted subject to conditions imposed by the Licensing Authority following an objection from an “Interested Party”.

4. Drivers’ Panel

- 4.1 The Chairman of the Licensing Committee exercised their delegation to immediately suspend a driver’s licence on three separate occasions. The suspensions were carried out as a result of information received and to ensure that the Licensing Authority’s primary role of public protection was met.
- 4.2 Drivers’ Panels have considered 18 matters since the last meeting of the Licensing Committee. The Drivers’ Panel has met on six occasions to deal with the following matters.
 - 4.2.1 On 9th October 2023, the Drivers’ Panel considered five matters; two of which related to the licensing of vehicles which exceeded the Council’s policy for the age of a vehicle upon first application. In both instances the Panel considered that they could depart from the Council’s policy after inspecting the vehicles and being satisfied that both vehicles were of a satisfactory condition to be licenced as Private Hire vehicles. The Panel considered three further reports

with respect to licensed drivers. Two licences were revoked due to the licensed drivers no longer meeting the Group 2 Medical Standard as required by the Council for licensed drivers. One driver's licence was suspended by the Panel due to an ongoing investigation with respect to conduct.

- 4.2.2 On 16th October 2023, the Drivers' Panel considered an application for a Private Hire Vehicle Driver's Licence which had been referred in accordance with the Council's Criminal Convictions Policy. The Panel considered that they could depart from the Council's policy and grant the licence, being satisfied that the applicant was a 'fit and proper person'.
- 4.2.3 On 19th October 2023, the Drivers' Panel considered two applications for Private Hire Vehicle driver's licences which had been referred in accordance with the Council's Criminal Convictions Policy. In one matter the Panel considered that they could depart from the Council's policy and grant the licence, being satisfied that the applicant was a 'fit and proper person'. The second application was refused on the basis that the Panel did not consider the applicant to be a 'fit and proper person'.
- 4.2.4 On 13th November 2023, the Panel considered two reports with respect to licensed drivers. Two licences were revoked due to the licensed drivers no longer meeting the Group 2 Medical Standard as required by the Council for licensed drivers.
- 4.2.5 On 21st November 2023, the Panel was due to consider four matters. However, two matters relating to drivers were adjourned due to the non-attendance of the drivers. The Panel considered a report with respect to a licensed driver who had received six points on their DVLA issued driving licence. The Panel determined to take no formal action. However, the driver was warned regards future conduct. The Panel considered a report with respect to an application for a new driver's licence following notification that the applicant had received six points on their DVLA issued driving licence. The Panel determined to grant a licence.
- 4.2.6 On 4th December 2023, the Panel was due to consider four matters. However, one matter was adjourned due to the non-attendance of the applicant. Two matters related to the licensing of vehicles which exceeded the Council's policy for the age of a vehicle upon first application. In both instances the Panel considered that they could depart from the Council's policy after inspecting the vehicles and being satisfied that both vehicles were of a satisfactory condition to be licensed as Private Hire vehicles. The Panel considered a report with respect to an application for a new driver's licence following notification that the applicant had received six points on their DVLA issued Driving Licence. The Panel considered that they could grant the licence, being satisfied that the applicant was a 'fit and proper person'.
- 4.3 The Drivers' Panel is scheduled to meet on 19th January 2024 to consider five matters. A summary of the results of the Panel's meeting will be provided in the next Committee update report.

5. Licensing Team

- 5.1 In September 2023, Licensing Officers teamed up with colleagues from Chelmsford City Council's Licensing Team to undertake proactive inspections of Taxis and Private Hire Vehicles at a large-scale event at the Chelmsford City racecourse. Officers inspected 32 Braintree District licensed vehicles and generally standards were found to be very good. Officers did however highlight issues with two vehicles, which related to tyres on or beyond the legal limit and a damaged trim. Further action was taken against the proprietors/operators of the vehicles in question to ensure the vehicles were roadworthy and presentable.
- 5.2 Also in September 2023, Officers undertook proactive inspections of Licensed Taxis and Private Hire Vehicles with colleagues from Essex Police. Councillor John Baugh, Chairman of the Licensing Committee, requested to join Police and Council Officers to get an understanding of the work undertaken by the Team.
- 5.3 In early November 2023, Officers from the Licensing Team undertook a regular patrol with colleagues from Essex Police. The Team focussed on the proactive inspection of Taxis and to discuss with drivers reports that some drivers were not accepting card payments when possible and refusals of short distance fares.
- 5.4 The Licensing Team has seen a steep increase in the number of applications for driver and vehicle licences in the last two years, with the Council issuing it's 1,000th driver licence in November 2023. This milestone presents a significant effort from several teams within the Council. This includes reception staff at Causeway House who help manage the weekly driver knowledge tests, the Licensing Team who process the applications and manage licence holders, and the Governance Team who manage the Committee processes. The Council has 1,048 licensed drivers and approximately 900 licensed vehicles.

6. Taxis and Private Hire – Department for Transport - Best Practice Guidance

- 6.1 The Department for Transport (DfT) has published the Best Practice Guidance for Taxi and Private Hire Vehicle licensing functions. In addition to the best practice guidance, the DfT has also published:
- Private Hire Vehicle Licensing Guidance Note
 - Taxi Byelaws: Guidance and the Byelaw Making Process
 - Updated Model Byelaws for Taxis
 - Model Driver Vehicle Checklist
 - Sample Notices between Taxi or Private Hire Vehicle Driver and passenger

6.2 The Licensing Team has been waiting for this Guidance to be released and will be taking the new Guidance into consideration as part of the drafting of the revised Taxi Policy.

7. Government Plans to Extend Licensing Hours for European Football Championships

7.1 The Government has set out plans to extend licensing hours for the semi-finals and final of the men's European Football Championships in summer 2024 should England, Wales or Scotland reach the final stages of the tournament. The proposal is subject to public consultation, but if implemented it is proposed that licensing hours in England and Wales should be extended from 11pm to 1am if any of the UK Nations remaining in the tournament reach the latter two rounds in Germany.

7.2 There are no obvious impacts that will affect the Licensing Authority from this proposal identified at this time. Essex Police will assess the impacts on crime and disorder and public safety with respect to licensed premises should the plan need to be put in place.

8. Animal Welfare Licensing - Animal Protection Agency Issue Guidance on Snake Enclosure Sizes

8.1 Defra's Animal Welfare Committee (AWC) recently completed a year-long investigation and report regarding snake enclosure sizes and welfare. Following an extensive study of the evidence and consultation including academic scientists, veterinarians, and trade stakeholders, the AWC report decisively concluded that enclosures must be large enough to allow snakes to fully stretch their bodies at will.

8.2 AWC (2023) Opinion on the space requirements for snakes in vivaria within pet selling establishments. <https://www.gov.uk/government/publications/awc-opinion-on-the-space-requirements-for-snakes-in-vivaria-within-pet-selling-establishments>

8.3 In addition, a raft of scientific research and review studies (samples included below) have confirmed that snakes must be able to fully stretch in all enclosures to meet with their welfare needs and thus the legal provisions of the Animal Welfare Act (2006). In addition, conditions in which snakes cannot fully stretch are associated with at least 40 stress-related issues; these issues significantly increase the risk of snakes shedding harmful bacteria to their keepers exacerbating public health and legal concerns.

8.4 The Licensing Authority will consider this advice when assessing applications received in accordance with The Animal Welfare (Licensing of Activities Involving Animals) (England) Regulations 2018, in particular selling animals as pets.

9. Dog Breeding - XL Bully

- 9.1 The Council has written to licensed dog breeders following the recent amendment to the Dangerous Dogs Act 1991 adding the XL Bully breed of dog to the banned list of dog breeds.
- 9.2 The latest revision, which came into effect on 31st December 2023, to the Dangerous Dogs Act 1991 makes it a criminal offence to breed XL Bully dogs, which includes breeding from an XL Bully dog, or allowing for an XL Bully dog to be bred from any combination of other dogs.
- 9.3 The change in the Act allows for a litter of puppies that have already been conceived to be born. However, it will be an offence to sell or rehome puppies born after 31st December 2023. The Council has recommended that licensed dog breeders should cease all breeding activity as it will be a criminal offence to sell, transfer, exchange, gift, or advertise these dogs from 31 December 2023.
- 9.4 For licensed breeders selling puppies less than eight weeks old before 31st December 2023, their customers will still be able to collect the puppy legally when it is eight weeks old.

10. Gambling - Industry Data

- 10.1 The Gambling Commission has published further data on the gambling industry in Great Britain. This data, sourced from operators, reflects the period between March 2020 and September 2023 inclusive, and covers online and in-person gambling covering Licensed Betting Operators (LBOs) found on Britain's high streets. This release compares Quarter 2 (Q2) of the financial year 2022 to 2023 with Q2 of 2023 to 2024, looking at how the market has changed in comparative periods over a year. The latest operator data shows:
- Online total Gross Gambling Yield (GGY) in Q2 (July to September) was £1.2 billion, an increase of 0.6 percent from Q2 the previous year. The overall number of total bets and/or spins increased 10 percent Year-on-Year (YoY), whilst the average monthly active accounts increased 7 percent.
 - Real event betting GGY decreased by 5 percent YoY to £428 million. Total bets for the vertical decreased by 1 percent while actives decreased by 0.2 percent.
 - Slots GGY increased 8 percent to £589 million YoY. The number of spins increased 11 percent, while the average monthly active accounts in Q2 also increased 11 percent to 3.8 million per month.
 - The number of online slots sessions lasting longer than an hour increased by 4 percent YoY to 9.3 million. The average session length decreased to 17 minutes, approximately 7 percent of all sessions lasting more than one hour.

- LBO GGY decreased by 0.4 percent to nearly £539 million in Q2 2023 to 2024, compared to the same quarter last year, while the number of total bets and spins decreased 1 percent to 3.1 billion.

11. Young People and Gambling Report (2023)

11.1 The Gambling Commission conducts an annual study which helps understand children's and young people's exploration to, and involvement in, all types of gambling. The research was conducted in schools, with pupils completing online self-completion surveys in class. The study collected data from a sample of 3,453 11 to 16 year olds as in previous years and, for the first time 17 year olds, attending academies, maintained and independent schools in England, Scotland, and Wales.

In 2023:

- 26 percent of respondents spent their own money on some form of gambling in the last 12 months, compared with 31 percent in 2022
- excluding arcade gaming machines which young people can play legally, four percent of respondents spent their own money on regulated gambling (age restricted products), compared with five percent in 2022
- 0.7 percent of respondents were identified as problem gamblers by the youth adapted DSM-IV-MR-J screen compared with 0.9 percent in 2022
- 1.5 percent of respondents were identified as at-risk gamblers compared with 2.4 percent in 2022
- 55 percent had seen gambling adverts offline, compared to 66 percent in 2022, and 53 percent had seen adverts online, compared to 63 percent in 2022.

11.2 The Commission requires gambling operators to have strong protections in place to prevent children from accessing products illegally. This means the most common types of gambling activity that young people spent their own money on were legal or did not feature age restricted products:

- playing arcade gaming machines such as penny pusher or claw grab machines (19 percent)
- placing a bet for money between friends or family (11 percent)
- playing cards with friends or family for money (5 percent).

11.3 Protecting children and young people from harm remains a priority for the Commission. This includes examining strengthening age verification in premises by considering responses to proposals to:

- remove the current exemption from carrying out age verification test purchasing for the smallest gambling premises
- changing the good practice code to say that licensees should have procedures that require their staff to check the age of any customer who appears to be under 25 years of age, rather than under 21 years of age

11.4 As part of a White Paper, the Commission is also examining staff supervision in some premises. The Commission will explore through consultation the evidence around premises where there is not normally direct staff supervision (such as Adult Gaming Centres in service stations) and consider whether existing requirements effectively prevent underage gambling.