



Mid Sussex District Council  
Unmet demand survey 2017

February 2018



## Executive Summary

This Unmet demand survey 2017 has been undertaken on behalf of Mid Sussex District Council following the guidance of the April 2010 Department for Transport (DfT) Best Practice Guidance document, and all relevant case history in regard to unmet demand. This Executive Summary draws together key points from the main report that are needed to allow a committee to determine from the facts presented their current position in regard to the policy of limiting hackney carriage vehicle licences according to Section 16 of the 1985 Transport Act. It is a summary of the main report which follows and should not be relied upon solely to justify any decisions of a committee, but must be read in conjunction with the full report below.

Licensed vehicle operations across Mid Sussex appear very healthy with good levels of customer satisfaction. The area tends to see different operational styles in the four areas. East Grinstead tends to see separate hackney carriage and private hire operation, Hassocks little hackney carriage operation and both Hayward's Heath and Burgess Hill see mixed hackney carriage and private hire fleets but with most people considering they are served by hackney carriages, as most are. The main concern in the area is the reliance of the hackney carriage fleet on ranks dependent on supplementary permits not under Council control.

At present, Mid Sussex District Council restricts the number of hackney carriage vehicles to 154. This current policy limiting hackney carriage vehicles appears to provide overall public benefit mainly in terms of stability. The level of unmet demand observed is not significant which provides the option of retaining this limit, at the current level, and being able to defend this if challenged. In fact, the level of unmet demand has reduced to the extent there is no off-peak passenger delay observed which sets the formal index to zero.

The council ranks all show smaller levels of demand with about half of them now operating mainly in response to telephone bookings, albeit serviced by hackney carriages which can and do supplement the bookings by being able to wait at ranks or be hailed.

The application of Sections 165 and 167 of the Equality Act appears to have brought public benefit and is best practice. There remains strong evidence that further benefit will occur from the application of the forthcoming livery policy, as long as this is supported by a strong publicity exercise.



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## 1 General introduction and background

Licensed Vehicle Surveys and Assessment (LVSA) is a joint venture between CTS Traffic and Transportation Ltd (CTS) and Vector Transport Consultancy. These two companies have hitherto been the two leading practitioners of hackney carriage unmet demand surveys in recent years who joined forces in early 2017. The combined experience of this joint venture covers more than 150 similar studies undertaken since 1999. The contracting company for this survey, CTS, also undertook the previous two surveys for Mid Sussex.

Mid Sussex 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 Police Clauses Act 1847. This has been amended and supplemented by various following legislation including the Transport Act 1985, Section 16 in regard to hackney carriage vehicle limits, and by the Local Government Miscellaneous Provisions Act 1976 with reference to private hire vehicles and operations. Many of the aspects of these laws have been tested and refined by other more recent legislation and more importantly through case law.

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

The legislation around licensed vehicles and drivers has been the subject of many attempts at review. The limiting of hackney carriage vehicle numbers has been a particular concern as it is often considered to be a restrictive practice and against natural economic trends. The three most recent reviews were by the Office of Fair Trading in 2003, through the production of the BPG in 2010, and the Law Commission review which published its results in 2014. None of these resulted in any material change to the legislation involved in licensing.

The upshot of all these reviews in respect of the principal subject of this survey is that local authorities retain the right to restrict the number of hackney carriage vehicle licenses. The Law Commission conclusion included retention of the power to limit hackney carriage vehicle numbers but utilizing a public interest test determined by the Secretary of State. It also suggested the three- year horizon also be used for rank reviews and accessibility reviews. However, there is currently no expected date either for publication of the Government response to the Law Commission, nor indeed any plans for revisions to legislation.

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.

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

Some of the application has differed between Scottish and English authority's. This is mainly due to some court cases in Scotland taking interpretation of the duty of the licensing authority further than is usual in England and Wales, requiring current knowledge of the status of unmet demand at all times, rather than just at the snap-shot taken every three years.

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

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

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

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

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

This was enacted from April 2017 and has been taken on board by Mid Sussex. There remains no confirmation of any timetable for instigating either the remainder of the Equality Act or the Law Commission recommendations, or for the update of the BPG.

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

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

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



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

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

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## 2 Local background and context

Key dates for this Unmet demand survey 2017 for Mid Sussex District Council are:

- CTS Traffic and Transportation appointed on 29<sup>th</sup> September 2017
- as confirmed during the inception meeting for the survey held on Tuesday 10<sup>th</sup> October 2017
- Survey was carried out between October and December 2017
- Pedestrian street survey work occurred in November 2017
- Video rank observations occurred in November 2017
- Vehicle driver opinions and operating practices were canvassed using an all-driver survey issued by the council and available for completion until mid-December 2017
- A meeting and area tour with key trade representatives also undertaken in November 2017
- Key stakeholders were consulted throughout the period of the survey

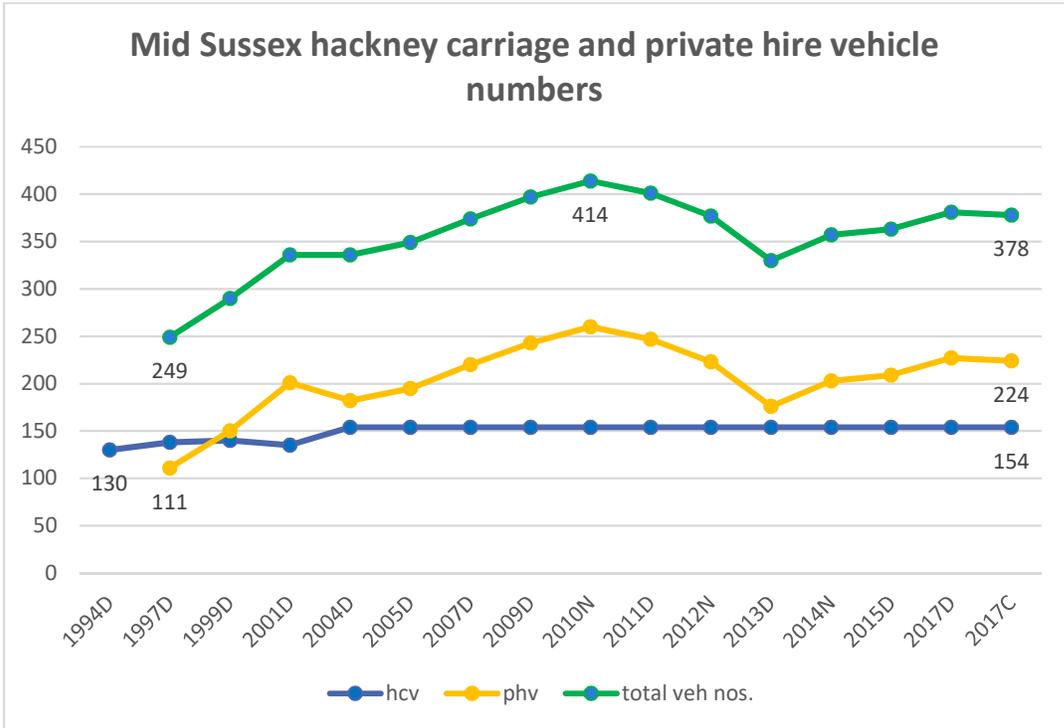
Mid Sussex District Council forms part of the two-tier authority of West Sussex County Council. The authority has a current population of 145,900 using the 2017 estimates currently available from the 2011 census.

In terms of background council policy, West Sussex County Council are the authority that deals with overall transport policy. This means that rank provision is undertaken at County level along with traffic regulation and its enforcement, although as with other authorities the County ensures significant involvement of Mid Sussex Council in such decisions.

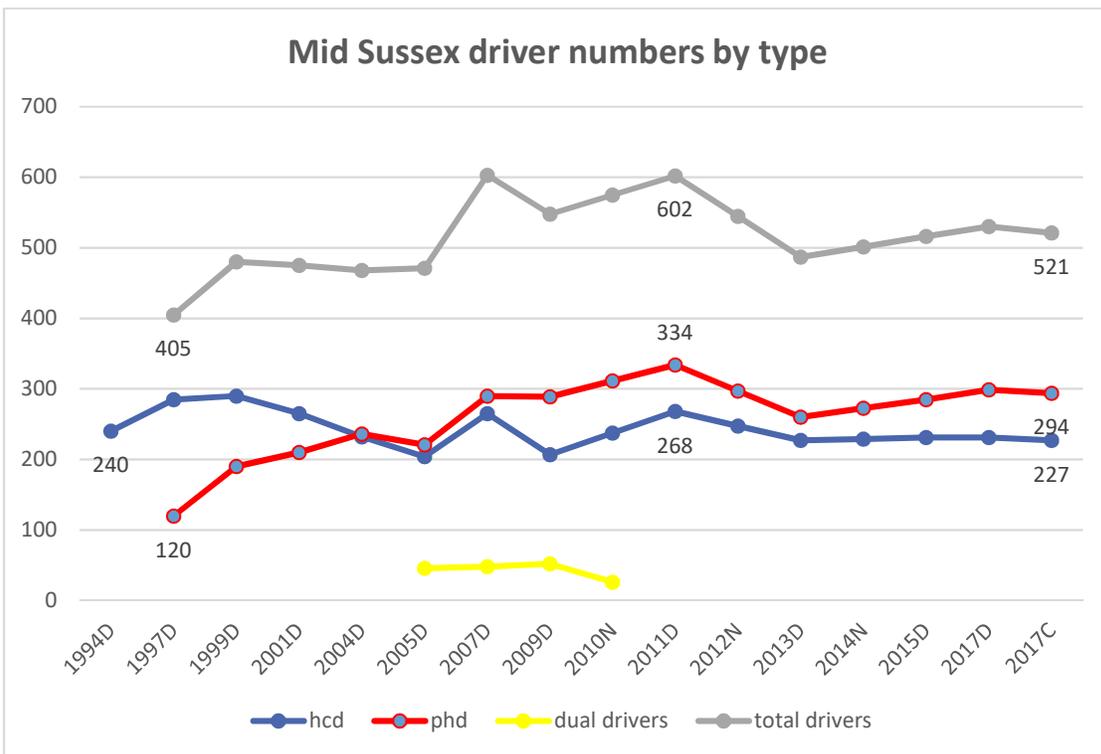
However, all licensing authorities have full powers over licensing the vehicles, drivers and operators serving people within their area. Mid Sussex District Council has chosen to utilize its power to limit hackney carriage vehicle numbers, and as far as we are aware has done so since at least 2003 in the current format. The authority retains a mixed vehicle hackney carriage fleet.

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



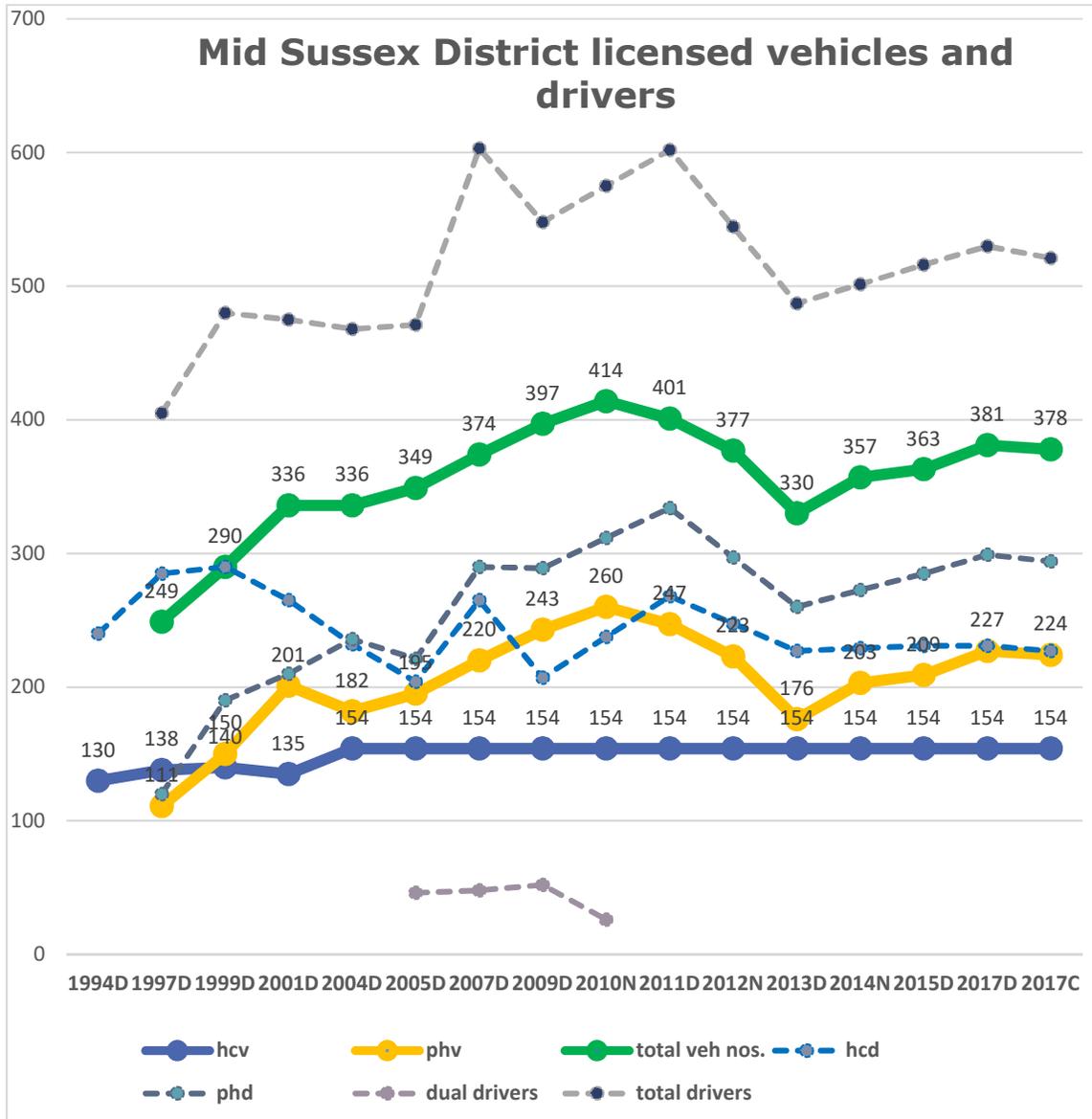


**Licensing Statistics from 1994 to date - vehicles**



**Licensing Statistics from 1994 to date - drivers**





**Licensing Statistics from 1994 to date – vehicles and drivers**

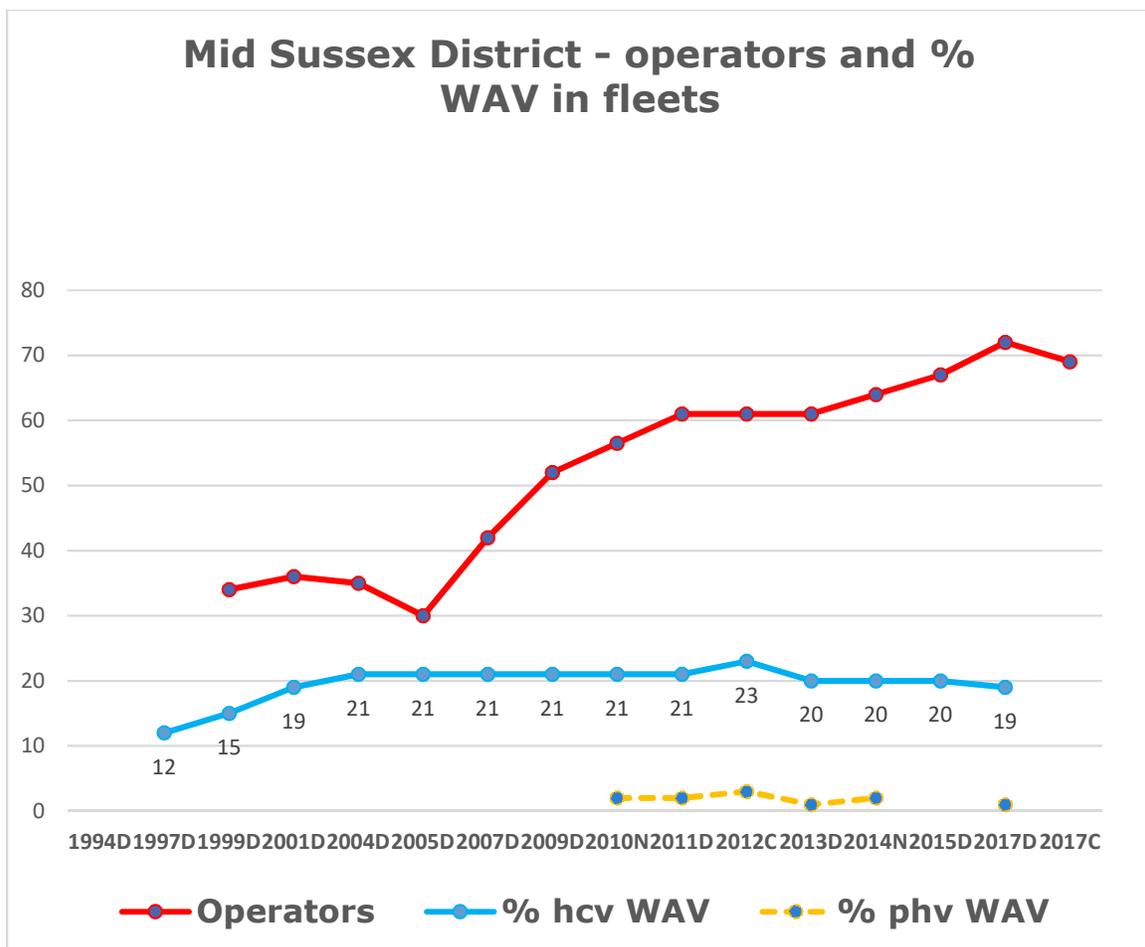
The graphs demonstrate that the current number of hackney carriage vehicles has been 154 since 2004. Prior to this, numbers had increased by 18%. Private hire vehicle numbers rose to a peak some 134% more than the level in 1997 but have since that 2010 peak level dropped to a low in 2013, with some recent resurgence leaving their numbers currently just over double the number in 1997. In the latest information there is suggestion that the growth of the previous three years has again seen a slight decline to current levels.

Driver numbers in the area are interesting. Before the time the current limit on vehicle numbers was set, there were more hackney carriage drivers than private hire, with about equal numbers of private hire drivers and vehicles.



Since the current number of hackney carriages has been in place, there have been more private hire drivers than hackney carriage, with hackney carriage driver numbers increasing in 2011 then numbers remaining stable to date, whilst private hire driver numbers peaked in 2011, then dropped but have more recently grown as private hire vehicle numbers have grown, but also showing the most recent marginal decline in numbers.

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



Operator numbers and levels of WAV provision in the fleet



These figures show that private hire operator numbers have generally increased in the area over time, but again with the most recent slight reduction in overall numbers between the DfT and formal council statistics for 2017.

In terms of wheel chair accessible levels of vehicles, the current 19% remains very similar to the level first attained in 2001, although there was a high point of 23% in 2012 and the current level is marginally less than the typical level since 2001. Only a small number of wheel chair accessible vehicles exist in the private hire element of the trade.

Mid Sussex District Council undertakes regular review of its policy to limit hackney carriage vehicle numbers in line with the Best Practice Guidance from the Department of Transport (BPG). The previous surveys were in 2014, 2011 and 2007.

Mid Sussex District Council has also adopted fully sections 165 and 167 of the Equality Act 2010 under the permissive option provided for in April 2017. A list of wheel chair accessible vehicles (WAV) is published, with those drivers now having to meet the full requirements of this Act. There are 30 hackney carriages and five private hire vehicles on this list. This is current best practice and was agreed in full with the trade before implementation.

### ***Industry structure***

During the inception and area visit, information was gathered regarding the current structure of the licensed vehicle industry in Mid Sussex. This is important background helping the understanding of the observations that follow. There are three large companies in place. Only one of these covers the full area. One has a booking office at Hayward's Heath station. There are 19 operators with around four vehicles each and 47 operators who are either one- man bands or who have no more than two vehicles. There are two known small hackney carriage only telephone networks. At the present time there are some mergers or take-overs under way within the medium sized fleet. Quite a number of operators focus work on one of the four areas and around a third of operators are 'mixed fleet', i.e. they have both hackney carriage and private hire working for them.

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### 3 Patent demand measurement (rank surveys)

As already recorded in Chapter 2, control of provision of on-street ranks in Mid Sussex District Council is under control of the higher tier of West Sussex County Council, although the County involve the District in most decisions regarding revision to provision. Appendix 2 provides a list of ranks in Mid Sussex District Council at the time of this current survey.

Our methodology involves a current review both in advance of submitting our proposal to undertake this Unmet demand survey 2017 and at the study inception meeting, together with site visits where considered necessary. This provides a valid and appropriate sample of rank coverage which is important to feed the numeric evaluation of the level of unmet demand, and its significance (see discussion in Chapter 7). The detailed specification of the hours included in the sample is provided in Appendix 3.

Since the last survey, there have been some changes to rank provision, but more changes to the facilities which provide demand to the ranks. The principal change has been at Hayward's Heath station where the former feeder rank has been replaced with a more distant site, linked to the main rank by a cctv system which appears to work well. All vehicles should now check there are no vehicles at the feeder location before proceeding to the main rank. For many this is on their route to the station, but there can be issues with traffic congestion delaying vehicles getting from the feeder to the main rank at busy times. Allied to this revision has been the removal of one of the former two private hire offices on the station forecourt.

The small rank formerly on the northbound side of Perrymount Road north of its junction with Broadway has now been removed and replaced by two locations on Broadway. There are now two night time ranks located in Broadway, with one on the northbound side and the other on the southbound side, the latter being closer to the traffic signals to the south end of Broadway. Both are available for parking during the day time, which can cause issues when vehicles do not vacate the spaces at the end of the parking provision.

There have been no other changes to physical provision of ranks, but there has been a reduction in nightlife provision in East Grinstead, with the last club that operated there, and which was near to the London Road rank, now having become daytime focussed premises. The focus of night demand has now moved further north to the area around the junction with Railway Approach, albeit at a lower level of passenger potential.



### **Overview of rank operation**

Our observations at or near ranks found a total of some 4,571 vehicle arrivals and departures. 9% of these were cars, some of which interfered with operation of the rank. However, the largest number were at the informal location in London Road, East Grinstead, which cannot be counted as there is no formal rank there. The next worst location for issue with cars potentially affecting rank operation was at the The Broadway, Hayward's Heath. Around 58% of movements here were cars rather than hackney carriages. This suggests there may be need for civil enforcement regarding parking here.

Very few private hire vehicles were observed near to ranks, no more than 1%, and there were very few goods vehicles active at or near ranks.

### **Rank usage overview**

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

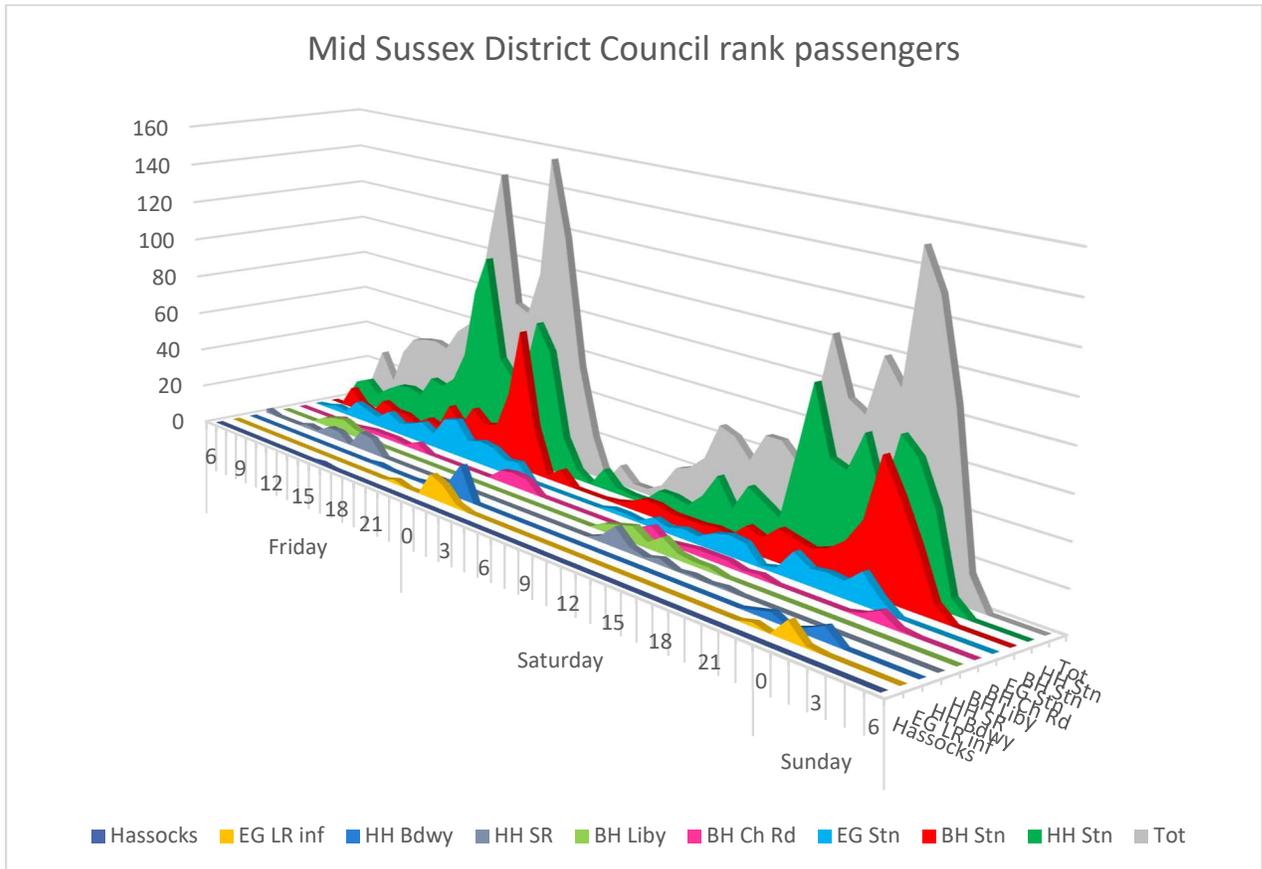
Rank	Passengers per week, 2017 survey	Passengers per week, 2014 survey	Passengers per week, 2011 survey
Hayward's Heath Station	4,692 (56%)	4,527 (54%)	2,148 (60%)
Burgess Hill Station	1,955 (23%)	2,113 (25%)	442 (12%)
East Grinstead Station	933 (11%)	1,167 (14%)	450 (12%)
Church Rd, Burgess Hill	213 (3%)	78 (1%)	Not observed
South Road, Hayward's Heath	193 (2%)	211 (3%)	185 (5%)
The Broadway, Hayward's Heath	164 (2%)	Not observed	Not observed
Civic Way, Burgess Hill	174 (2%)	228 (3%)	204 (6%)
London Rd, East Grinstead (informal location)	93 (1%)	0 (0%)	174 (5%)
Keymer Rd, Hassocks	5 (0.0%)	6 (0.0%)	Not observed
(total non-private demand)	842 (10%)	523 (6%)	570 (16%)
Hassocks Station	No longer available	No longer available	7 (0.0%)
<b>TOTAL</b>	<b>8,422</b>	<b>8,330</b>	<b>3,610</b>
<b>Change from previous survey</b>	<b>+1%</b>	<b>+130%</b>	
<b>Change from first survey</b>	<b>+133%</b>	<b>+130%</b>	

For the current survey, as in all previous surveys, the bulk of passenger demand occurs at Hayward's Heath station. The proportion and actual volume has increased since the 2014 survey. This rank provides some 56% of all estimated passenger demand in the area at ranks. Burgess Hill is second with 23% (slightly reduced from last time), with East Grinstead third with 11% (again reduced from last time).

The busiest non-station rank is Church Road in Burgess Hill, with 3% of estimated passengers, followed by South Road and The Broadway, both in Hayward's Heath, and Civic Way, Burgess Hill, all with about 2% of total passenger demand. The informal location in East Grinstead saw some 1% of demand, less than the formal rank saw in 2011, but more than was observed in 2014 when there was no activity observed at the formal rank further along.

In this survey, the proportion of passengers from the non-station ranks is some 10%, higher than in the previous survey, but still less than the 16% observed in 2011 (where overall flows were much lower). The principal change appears to be more usage of Church Road in Burgess Hill although some of this demand is in the hours this rank is not actually operating, and may relate to phoned for demand reacted to by hackney carriage vehicles to the location near to the rank. It also appears that the new arrangements at The Broadway in Hayward's Heath have been successful in attracting passengers compared to the little use previously found at the one single rank location.

The graph below demonstrates the overall picture of rank usage over the three-day observation period (only covering actual observations undertaken).



The graph first shows that the area has fairly similar demand profiles and levels for both the Friday and Saturday of our observations. There does, however, appear to be a bit more usage on the Saturday. The results are also very clearly dominated by the stations, with most at Hayward's Heath, then Burgess Hill and finally East Grinstead. Whilst Burgess Hill has one peak on both days, Hayward's Heath has two or three peaks, all from afternoon onwards. All the other ranks make small but clear contribution to the overall pattern of flows. In general, demand at East Grinstead appears to be more level than that in the other three areas, with no real major peaks occurring there at all. Church Road Burgess Hill clearly has two separate operating periods, one of which is when it is not formally a rank. Hayward's Heath South Road and Burgess Hill library are both principally daytime locations whilst Hayward's Heath, The Broadway and the East Grinstead informal location are only really active at night time.

Looking at the overall profile, there are several peaks on both days and clear periods of demand between the peaks. In our view, this gives the area a non-peaked demand profile in terms of the value needed for the index of significance of unmet demand (ISUD).

### ***Rank observations in detail***

This section considers detailed operation at each rank, working from the overall busiest rank to the quietest in each different part of the area to provide a quantitative view of how each location provides for demand. It allows us to provide a perception of the overall performance by rank, and to identify any issues arising which may or may not be identified in the public views. Further details are provided in Appendix 4.

### ***Hayward's Heath area ranks***

#### ***Hayward's Heath station***

This rank is directly outside the current main exit from the station, with the head of the rank just to the left of where passengers leave the station. Recent station developments mean the 11 spaces are supplemented now by an entirely separate feeder rank behind the new multi-storey car park, and linked to the main rank by a CCTV system. All vehicles should approach the main rank via the feeder, and this is generally enforced by the trade. Next to the rank is the drop-off car park which also provides access for set down and pick-up by private hire vehicles, including those with an operating base (not always manned) within the station frontage. The station also now has two other exits, one of which leads to the multi-storey car park.

This rank and its feeder were observed from 07:00 on the Friday morning, 3<sup>rd</sup> November 2017 through to 02:59 in the early hours of Sunday 5<sup>th</sup> November, when the rank became quiet.

#### ***Friday observations***

On the Friday, a total of 719 passengers left the rank in 594 hackney carriage departures, a very low occupancy of 1.2 per vehicle. A further 33 vehicles, just 5% of those arriving, left without passengers.

During this day, 13 passengers arrived when there was no vehicle available for them to take immediately. None waited more than two minutes, and the average passenger delay for the location was just two seconds. The waits occurred in the 18:00 and 19:00 hours and in the 04:00 hour. The first two hours were in fact the busiest two hours of the day in terms of total passengers.

Passenger flows ranged from two to 100, with just the 03:00 hour seeing no passengers at all (there were two vehicles passing through). From the 07:00 hour to the 13:00 hour flows ranged from eight to 18. The next three hours saw flows in the order of 25 to 31. The 17:00 hour saw 46, then 81 and then the peak of 100 in the 19:00 hour. After this, flows reduced to between 41 and 74 over the next five hours, before dropping to 19 and then 5 before the lack of passengers in the 03:00 hour.

There was a high flow of 10 passengers in the 04:00 hour followed by just three and then two passengers to the end of this period of survey.

Vehicles tended to wait between eight and 24 minutes for fares, though some waits, particularly in the early hours were much longer.

#### *Saturday observations*

The Saturday saw slightly less passengers, 665 leaving in 468 hackney carriages, a low occupancy of 1.4 per vehicle. A further 47, some 9%, left without passengers. Just 9 passengers arrived when there was no vehicle available for immediate hire, and these were in the midnight and 01:00 hours towards the end of the observations. The longest wait was six minutes, and the average passenger delay on that day was just four seconds.

The first four hours from 07:00 on saw between two and nine passengers only. From 11:00 to 16:00 there were between 14 and 26 in each hour. Flows then rose to the peak of 83 in the 18:00 hour. Apart from that hour, all flows were then between 43 and 71, apart from the 02:00 hour that saw just seven before the rank and area became quiet.

Daytime waits by vehicles were sometimes up to two hours, but on average were between 13 and 45 minutes, with some exceptions.

#### *Summary*

This rank sees **good** service, although vehicles are clearly waiting relatively long periods to obtain fares.

#### ***South Road, Hayward's Heath***

South Road in Hayward's Heath is a five-space rank within a shopping street of Hayward's Heath. Within the frontages to the road, there is a cash machine, with another on the opposite side of the road. There are also a number of shops who need regular servicing adjacent to the rank.



The rank was observed from 06:00 on Friday 3<sup>rd</sup> November 2017 through to 05:59 in the early hours of the Sunday morning. On both days the rank saw quite a few hackney carriage and other vehicles pause on the rank while their passengers (or in some cases drivers) used the nearby cash points. It also appeared that many departures from the rank were booked trips rather than walk-in trips. No passenger ever arrived when there was not a vehicle there available for hire on either day. There were several occasions when either parked or delivery vehicles obstructed the rank, although on both days there were also periods when the rank and other parking restrictions were very clearly and effectively enforced by a warden.

#### *Friday observations*

On the Friday a total of 32 passengers left the rank in 25 vehicles, a low average occupancy of 1.3 per vehicle. A further 40 vehicles, some 61% of the total arriving, left without passengers. Average waiting times for fares ranged from 4.5 to 29.5 minutes, with quite a number of vehicles waiting up to 40 minutes for fares.

Passenger flows ranged from one up to a peak of 9 (in the 15:00 hour), with a further eight in the following hour. There were two passengers in the 06:00 hour but otherwise no activity till the 10:00 hour, and nothing after the 16:00 hour.

#### *Saturday observations*

The Saturday saw a lower total of 22 passengers leaving in 17 vehicles, a similar low occupancy level. Again a similar 62% of arriving vehicles left without taking passengers.

Vehicles waited between five and 28 minutes for fares, with one vehicle waiting for 41 minutes.

There were less hours with passengers, with the main usage being from the 10:00 hour to 14:00, with one passenger in each of the 16:00 and 18:00 hours and no other activity (other than the vehicles pausing for the cash point). The peak hour saw 10 passengers use the rank in the 11:00 hour.

#### *Summary*

Service to this rank is **good**.

### ***The Broadway, Hayward's Heath***

This pair of ranks were observed from 18:00 on both the Friday and Saturday nights through to 07:59 the next morning, the full formal operating hours of both locations. There were times when the ranks had other vehicles using them, but this did not seem to interfere as much with operation as at other sites. The biggest issue with operation was the regular queueing of vehicles alongside the rank delaying vehicles leaving, related to the busy traffic junctions around the ranks.

Neither night saw any passengers ever arrive when there was no vehicle available for immediate hire.

#### *Friday observations*

The Friday night saw 28 passengers leave the rank in 14 vehicles, a relatively high average occupancy of two per vehicle. A further five vehicles, 26% of those arriving left empty. Vehicle waiting times for fares were between three and 12 minutes, with the longest observed wait being 15 minutes.

There was one passenger in the 18:00 hour but then none until the 22:00 hour. There were then between three and 17 passengers in each hour up to and including the peak hour of 01:00. After this, the rank and whole area became quiet with no activity at all.

#### *Saturday observations*

The Saturday saw less passengers, 16 leaving in 12 vehicles, a low average occupancy of just 1.3 persons per vehicle. A similar five vehicles left without passengers, 29% of those arriving.

During this period, flows were from two to seven between the 21:00 and 01:00 hours, with the peak in the 01:00 hour again, but no passengers in the 23:00 hour. Again, after the 01:00 hour, the area became quiet.

#### *Summary*

This rank sees **good** service levels.

### ***Burgess Hill area ranks***

#### ***Burgess Hill station***

This rank is on the station forecourt and the overbridge over the railway line. It is adjacent to the main road and the boundary between rail and council land is not clear. Vehicles wait with the head of the rank near the station exit, but this means passenger loading tends to be from the driver side, though given the wide area passenger-side loading can be undertaken but can need care given other vehicles passing near by.



There has been a feeder rank in Wolstonbury Way but this is not currently marked and vehicles tend to double park when there are a number waiting. The rank was observed from 08:00 on Friday 3<sup>rd</sup> November 2017 to 05:59 in the early hours of Sunday 5<sup>th</sup> November 2017.

#### *Friday observations*

The Friday saw a total of 294 passengers using 219 hackney carriages to leave the station. This is a low average occupancy of 1.3 per vehicle. 11% of arriving vehicles left without passengers. There were 16 people who arrived and had to wait for a vehicle to arrive. The average passenger waiting time over this day was eight seconds. The longest recorded wait was four minutes. Three people waited in the 08:00 hour, ten in the 23:00 hour and two in the 01:00 hour.

Passenger flows ranged from two to 11 in the hours up to and including the 16:00. The next five hours saw flows that ranged between 12 and 23, after which flows rose to the peak of 71 in the 23:00 hour, when 10 people had to wait. Flows then fell back to 24, two and seven, with no passengers in the 03:00, 04:00 or 05:00 hours. 06:00 saw one passenger.

In the daytime hours, vehicle waits tended to be between 11 and 37 minutes, although the wait reduced from 17:00 onwards (average of four to 19 minutes).

#### *Saturday observations*

On the Saturday, passenger flows were higher, with 323 people using 195 hackney carriages to leave the station, a moderate occupancy of 1.7 per vehicle and high for a station. 14% of arriving vehicles left without passengers. Just four passengers had to wait for a vehicle to arrive, but none for more than three minutes, with an average over the day for waiting of just two seconds. Waits were at 17:00 and midnight.

Passenger numbers were just three to seven in any hour up to and including the 14:00 hour. They were then between nine and 21 up to the 21:00 hour. 22:00 saw 33 whilst the peak was 23:00 with 64, followed by 48, 29, 7 and then none.

Vehicle waits were three to 16 minutes from 16:00 on but much longer before that with the lower flows seen.

#### *Summary*

This site has lower flows than Hayward's Heath and is much less used in the daytime, but still can be viewed as providing **good** service.



### ***Church Road, Burgess Hill***

This rank is near to WH Smith and to an entry through to the main shopping centre area, and near to a major public house. It has two spaces, with loading from the passenger side from a relatively wide (but busy) pavement. Although on a one-way road, other traffic nearby is very busy and offside loading would be dangerous. It formally is available only in the daytime. However, it was observed, at the request of the Council, from 07:00 on the Friday right through to 05:59 on the Sunday. During this period no passenger ever arrived and had to wait for a vehicle to arrive.

Our rank tour identified a vehicle which we had observed at the Library rank come to this location to pick up booked customers, who had waited for them happily having made their return booking. The passengers had waited a little way from the rank, in a sheltered location, so the observations below would find it hard to reflect such other occurrences.

#### *Friday observations*

On the Friday there were some 33 passengers leaving the rank using 21 hackney carriage vehicles (a moderate occupancy of 1.6 per vehicle). A very high level of 55% of the vehicles arriving left empty. Vehicles waiting for fares only saw waits of between three and six minutes, with the longest pause being 17 minutes by one vehicle and 13 minutes by another.

Daytime flows were between one and four passengers, with flows between the 10:00 and 17:00 hours. A higher level of six or seven passengers then used the rank in the midnight, 01:00 and 02:00 hours, although all these tended to be from outside the public house rather than directly at the rank, and could be phone-calls although vehicles did wait for passengers to arrive.

#### *Saturday observations*

On the Saturday there was a very similar level of usage, 32 passengers leaving in 20 vehicles, again a moderate occupancy of 1.6 per vehicle. Again a similar 52% left without passengers.

The rank saw between one and six passengers in the hours between 10:00 and the 18:00. Some vehicles waited between five and ten minutes for customers, but many vehicles and passengers arrived and departed at the same time, suggesting a high level of booked trips. Again, the rank was used in the midnight, 01:00 and 02:00 hours with between one and six using the area nearer to the public house. The peak was six in the 01:00 hour. The 02:00 hour saw one vehicle wait here for 20 minutes before taking a fare.



### *Summary*

The overall view of this rank is that it is mainly a meeting point for people who phone hackney carriages rather than a place people or vehicles would wait speculatively. Service here is overall **good**.

### ***Library, Burgess Hill***

This rank is right next to the Library in Burgess Hill, located in a dedicated slip road off Civic Way. There are ten spaces and the design means that no other vehicles can readily access the rank, helping provide designed-in enforcement. Being purpose-built, passengers can load from either side although most arrive and enter from the passenger side of the vehicle. It is available all hours. The rank was observed from 07:00 on the Friday 3<sup>rd</sup> November 2017 through to 06:59 on the Sunday morning.

### *Friday observations*

The Friday saw 24 passengers leave using 18 hackney carriages, a low occupancy of 1.3 per vehicle. A further 13 vehicles, 42% of those arriving left without passengers. No passenger ever arrived when there was no vehicle immediately available for hire.

The rank was active from the 10:00 hour until the 14:00 hour with no passengers, but some vehicles in the three hours following that (until the shopping area closed). Flows ranged from three to seven, with the busiest hour being the 12:00.

Vehicles waited between six and 23 minutes for fares, with the longest recorded wait by any vehicle being 35 minutes.

### *Saturday observations*

The Saturday saw a higher level of 36 passenger departures using 23 hackney carriages, also a higher moderate average occupancy level. A slightly lower 32% of arriving vehicles left without passengers. On this day, there were 14 of the passengers arriving when no vehicle was available for immediate hire. The longest wait was 13 minutes. The average wait over all passengers was nearly 2.5 minutes.

The rank saw vehicles from the 08:00 hour until the 16:00, with passengers using the rank in every hour from 09:00 to the 16:00. Flows were between two and eight, with the peak in the 13:00 hour. Passengers had to wait in every hour from 09:00 to 11:00, in the 13:00 and in the 15:00 hours.



The worst hour for waiting was the 13:00 where all but one passenger had to wait. In that hour the typical waiting time was nearly seven minutes. The 15:00 hour also saw two people having to wait nine minutes, with some passengers waiting from the previous period meaning everyone who arrived in this period had to wait.

When there were no passenger queues, vehicle waiting times for fares were between seven and 24 minutes, but these dropped to very low levels in the hours when there were queues.

### *Summary*

Service to this rank is **fair** – with a strong difference between the Saturday service and that on the Friday which may relate to vehicles operating.

### ***East Grinstead area ranks***

#### ***East Grinstead station***

The rank here is within the outer part of the pick-up and drop-off area for the station. There is a supplementary feeder separate to the rank and slightly further away from the station entrance. Passengers exit the station, are clearly signed right towards the head of the rank. Loading is from the passenger side of the vehicle and other loading would be safe given the nature of the area. Although the rank itself is clearly marked, other vehicles can use the area so this can be an issue for enforcement. Observations covered from 07:00 on Friday 3<sup>rd</sup> November 2017 through to 06:59 on the Sunday morning. No passenger ever arrived and found no hackney carriage waiting for them.

#### *Friday observations*

The Friday saw 153 passengers use the rank to leave in 139 hackney carriages, a very low occupancy of just 1.1 per vehicle. Empty departures were a further 8%. No-one arrived and had to wait to get a hackney carriage.

#### *Saturday observations*

Even less passengers used the rank on the Saturday – just 112 using 105 hackney carriages, again a very low occupancy of 1.1. A higher level of 10% left without taking any passenger. On this day, none arrived when vehicles were not immediately available for hire.

Flows were between one and 15 through the day. The peak flow was in the 23:00 hour, with 13 in the 19:00 hour and ten in the 15:00, otherwise all other flows were nine or less. The rank was quiet when trains ceased, with no passengers or vehicles in any hour after the 01:00.



Average vehicle wait times were prolonged with many waiting sometimes up to two hours.

### *Summary*

Service here is **good** although clearly the least busy of the station ranks.

### ***London Road informal usage, East Grinstead***

London Road has a small painted roundabout at its junction with Railway Approach in the shopping area of East Grinstead. The area around this has seen a number of late night facilities open over the last few years, and this part of London Road tends to be the focus of night time activity in this area. There is no formal rank in this location but a large amount of kerb space, albeit the first part towards the central area is zig-zag lines protecting the pedestrian crossing that is provided here. The location was observed from 21:00 until 06:59 on both nights.

### *Friday observations*

The Friday saw 25 passengers board 14 hackney carriages, a high occupancy of 1.8 per vehicle. Eight other vehicles, 36% of those arriving, left without passengers. In the midnight hour two people were observed to wait up to four minutes for a vehicle to arrive. The average passenger wait over all passengers here was 20 seconds. It is not clear if these passengers hailed a vehicle or had made a booking.

Passenger flows ranged from two to 12, with the peak in the midnight hour. Passengers arrived in the 21:00, midnight, 01:00 and 02:00 hours, with some vehicles in the 23:00 hour. Vehicles did pause here for between one and six minutes, so there was some treating of the kerb as a rank.

### *Saturday observations*

On the Saturday, there were just under half as many people taking hackney carriages from this location – 12 leaving in seven hackney carriages at a moderate occupancy of 1.7. A further 11, 61% of those arriving, left without passengers. Flows ranged from one to nine, with the peak again at midnight and other flows only in the 22:00 and 01:00 hours. Again some vehicles did pause here, but only for between one and four minutes. No-one arrived and had to wait for any vehicle.

### *Summary*

Overall service here is **fair** and suggests there may be value in considering moving the formal rank provision to this location, at least to regularise what is currently occurring.

## ***Ranks in other parts of the area***

### ***Hassocks***

This rank is in Keymer Road, in the parallel service road for various shops including the medium sized supermarket. It is just a single space near the entry to the road but is available all hours. Loading could be from either side although the kerb space mainly provides passenger side loading. Passing traffic is moving at relatively low speeds so driver side loading would be possible with caution if needed. The service road is one way away from the rank. The rank was observed from 07:00 on Friday 3<sup>rd</sup> November 2017 until 06:59 on the Sunday.

#### *Friday observations*

The Friday saw just one passenger leave the rank in one vehicle in the 16:00 hour, a trip which appeared to be booked.

#### *Saturday observations*

The Saturday saw just one vehicle pause at the rank having dropped off a passenger in the 08:00 hour.

#### *Summary*

This rank is not really used other than as an occasional drop-off and pick-up point. In consequence it is often used for parking or deliveries.

### ***Disability usage of ranks***

During the course of our observations, the only usage of ranks by people in wheel chairs was at the Church Road rank in Burgess Hill, where there was a total of eight passengers observed arriving or departing from the rank in wheel chairs. However, most of these users appeared to be pre-booked as none ever waited for vehicles to arrive.

In terms of wheel chair accessible vehicles, 27% of vehicle movements observed as hackney carriage appeared to be wheel chair accessible style. This is higher than the percentage in the fleet (19%) which suggests that many of these vehicles focus on rank work, more so than the saloon style vehicles. East Grinstead station rank saw about 35% of its movements WAV style whilst Hayward's Heath station saw 30%. This is encouraging.

### ***Plate activity levels***

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

During the course of the eight hours observed, 215 different valid local hackney carriage plates were observed. There were just a few more vehicles noted which were determined as either out of town vehicles or private hire. Of the current number of hackney carriage plates on issue, 42% of the total were seen at least once on that day.

Of the total observations, 41% were observed in the afternoon Hayward's Heath observations, with a further 7% in the night observations at the same location. 24% were seen at Burgess Hill station, 14% at East Grinstead station, 8% at South Road, Hayward's Heath, 4% at Civic Way Burgess Hill and the remaining 3% along London Road, East Grinstead.

One vehicle was observed nine times, three eight times, one seven times, five six times, eight five times and eight four times. The three most frequently observed vehicles were all only seen in Hayward's Heath. The fourth most frequently seen was seen mainly in Burgess Hill but once at Hayward's Heath.

32% of plates seen were seen just once. 29% of the different plates seen were only seen in the afternoon observations at Hayward's Heath station; 15% only at Burgess Hill station, 14% only at East Grinstead station, 5% only at Civic Way Burgess Hill, 5% only at Hayward's Heath South Road and 3% only passing London Road in East Grinstead. Just 5% of the plates seen were observed in more than one of the three main areas – confirming as before that most vehicles tend to service just one area and that there are a small number of plates that focus on servicing just the small ranks.

This may also relate to those unwilling to purchase either of the three station permits. The level of this appears higher this time, which may relate to the change that those with station permits now need to pay separately for each station, compared to the previous situation that the permit covered more than one station.

There is no evidence from this survey that there was any specific 'playing up' by the trade to the observations being undertaken.



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## 4 General public views

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

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

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

Our basic methodology requires a sample size of at least 200 to ensure stable responses. Trained and experienced interviewers are also important as this ensures respondents are guided through the questions carefully and consistently. A minimum sample of 50 interviews is generally possible by a trained interviewer in a day meaning that sample sizes are best incremented by 50, usually if there is targeting of a specific area or group (eg of students, or a sub-centre), although conclusions from these separate samples can only be indicative taken alone.

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



More recently, general public views have been enlisted from the use of council citizens' panels although the issue with these is that return numbers cannot be guaranteed. The other issue is that the structure of the sample responding cannot be guaranteed either, and it is also true that those on the panel have chosen to be there such that they may tend to be people willing to have stronger opinions than the general public randomly approached.

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

For this study, a total of 300 persons were interviewed providing a similar sample size to that undertaken in the previous study. The sample covered 100 from Hayward's Heath, 100 from East Grinstead, 50 from Hassocks and 50 from Burgess Hill. Further details of results are provided in Appendix 5.

For the full sample, 46% said they had used a licensed vehicle in the area in the last three months. Usage was highest in Burgess Hill and lowest in East Grinstead, with the range between 38% and 56% in the areas. All these figures are higher than in the previous survey but remain lower than the 61% having used a vehicle in the last three months in 2011.

Most told us how often they used licensed vehicles. Using these responses, we estimated (using information from the latest National Travel Survey) overall trips per month per person. On average, across the full set of people interviewed, people made 1 trip per month; slightly above the NTS value of 0.9 trips. This value varied from 0.6 in Burgess Hill to 1.3 in East Grinstead. Overall, the information suggests people use licensed vehicles most in East Grinstead, then Hayward's Heath, then Hassocks with the least usage in Burgess Hill. This estimate is later compared to the value for purely hackney carriages. Again, these values are higher than in 2014 when the overall value was 0.7.

Over all interviewees that responded, 53% said they got licensed vehicles by phoning a company. 37% said they got them at ranks and 2% hailed. 4% used a freephone and 4% an app. These values were similar across the four locations although East Grinstead had the lowest rank usage at 27%, and Hassocks only saw people using ranks (presumably in other parts of the area) or using phone. Use of an app was highest in Burgess Hill. These values are also higher than in 2014 for ranks when the average was 20%.

24 different companies were quoted as used. However, only 11 of these gained more than one citation, and only six were mentioned by 11 or more people. The top company obtained 24% of votes followed by 17%, 15%, 12%, 9% and 6%. Three companies have almost equal shares in Burgess Hill, with the top two of those also dominant in Hayward's Heath. Two other companies dominated East Grinstead, with two other companies dominant in Hassocks.

This shows the variation of the fleet across the area and also shows a fair level of competition, including some usage of small niche market operators by people overall. Since 2014, Hassocks has tended to become more independent on top of East Grinstead which has always been 'different'.

Interviewees were then asked about their specific usage of hackney carriages in the area. Of those responding, 34% said they could not remember when they had last used a hackney carriage in the area. However, no-one said they could not remember seeing one at all – the same as in 2014. The proportion of people not remembering when they last use a hackney carriage varied, with 44% in East Grinstead not being able to remember their last use of a hackney carriage, 50% in Hassocks, 25% in Hayward's Heath and none in Burgess Hill. This level has increased significantly in East Grinstead but reduced in both Hassocks and Hayward's Heath.

The resulting values were compared to those for use of all licensed vehicles and to the proportion saying they got licensed vehicles from ranks. In general, usage of hackney carriages estimated was 69% the level of total usage, quite high, and higher than the average 39% saying they got them from ranks. The worst over-estimate was that for East Grinstead, whilst Burgess Hill respondents' usage seemed much lower than those that said they used ranks there. It does suggest that across the area hackney carriages are better used than in many other areas compared to private hire.

We were also told the ranks people were aware of. Most people tended to know the station rank in the area they were interviewed in, with the Burgess Hill station rank being the only rank quoted as known by those interviewed in that area. Overall, the top three ranks, in order, were Hayward's Heath Station, Burgess Hill Station and East Grinstead Station. People in Hayward's Heath also knew of South Road (an improvement for this rank compared to 2014). Some in East Grinstead were aware of London Road, but also quoted an unknown location (one person said they used that rank). 28% of those at Hassocks quoted the station rank there (which does not formally exist as a rank).

Generally, however, there was a lot less knowledge of the smaller ranks now than in 2014. Interestingly, given the use of the The Broadway and Church Road, these are not mentioned as ranks. This tends to confirm the supposition that many are places hackney carriages drop off and pick up passengers who have made bookings.

There was a high quoted usage of the ranks cited – 76% across the four areas, ranging from 66% in East Grinstead to 94% in Burgess Hill.

Just nine people told us where they felt there should be new ranks. None suggested any locations in either Hassocks or Burgess Hill. The five suggestions in Hayward's Heath were all different locations whilst three of the four people in East Grinstead wanted a rank in 'High Street'. None of these responses are significant.

In terms of issues just 15% gave one or more concerns. No-one interviewed in Burgess Hill had any issues at all. Only 5% of those interviewed in Hayward's Heath cited issues – with 40% being issues with professionalism of drivers. Over a quarter of those interviewed in East Grinstead had issues, with slightly more having issues (28%) in Hassocks. The number of people having issues has increased, but not significantly.

Most issues listed in our questions were quoted as a problem by someone in East Grinstead – with several people having more than one issue. Of all the citations, the largest proportion were issues with driver helpfulness (18% of responses), followed by vehicle cleanliness and driver communication (15% each) then driver standards of hygiene (12%).

Although there were less specific issues raised in Hassocks, more people there had multiple issues. Nearly every respondent there had an issue with vehicle punctuality and reliability (amounting to 26% of those interviewed there). This suggests most concern with operations there, although this is the area where most focus will be on private hire vehicles rather than hackney carriage, although people were answering the question about 'hackney carriages'. This apparent strength of feeling in Hassocks is a concern, although it does not really relate to hackney carriages even though the question was focussed on them.

In terms of changes that might increase peoples' usage of hackney carriages, 37% gave at least one response. The highest proportion responding were in Burgess Hill, with the lowest response in Hayward's Heath. The largest 'standard' response was 'better vehicles' (13% of mentions), but the 'other' category provided 58% of all responses, dominating the results. Of this, 79% was the usual response of 'if they were cheaper'.



There were various alternative 'other' items given, but none were particularly significant. More hackney carriages to get at ranks was only important, and only marginally so, in East Grinstead, as might be expected. This is a higher level of suggestion than in 2014, but the concentration has also focussed much more on cost, perhaps a symptom of the present economic situation and the fact that licensed vehicles remain an item people consider something they can choose not to use.

In terms of needing adapted vehicles, 89% said they did not need, nor know anyone who needed one. Of those needing an adapted vehicle, the bulk said they knew someone who needed a WAV, rather than any other kind of adaptation. This response has not changed since 2014.

With respect to those claiming to have given up waiting somewhere in Mid Sussex at a rank, none of those responding in Burgess Hill said they had ever given up waiting at a rank anywhere. All those responding in Hayward's Heath had given up at the station rank there. The picture was different for those saying they had given up in East Grinstead. 75% had given up at the station, with the remainder having given up somewhere in the town centre. Everyone who gave up in Hassocks did so at the station rank there (which is not a formal rank). For the formal estimate of latent demand, this latter response should be discounted; as should the station ranks for the council only evaluation of significance of unmet demand.

This implies that the council rank estimate of latent demand is 1.007, very low, but rises to 1.047 taking on board those giving up at the two, private station ranks – higher than in 2014 (1.03). The factor would rise to 1.08 were the Hassocks responses to be included.

Just 1% of people had given up trying to hail a vehicle in the streets of the area – this response came from a Hayward's Heath respondent.

The sample interviewed had high regular access to a car – some 75%, with 78% of interviewees saying they lived in the Mid Sussex District Council area. These values are very similar to 2014 suggesting the other differences are real and not just a result of a different sample. The highest proportion of people from out of town was in East Grinstead, where 27% said they did not live in the area.

We interviewed a higher proportion of females than in the census – but only marginally so. The proportion of people from different age groups overall saw more under 30's than in the census balanced by our interviewing less of the older group, with the middle group about right over the full area.

This is different to 2014 and 2011, when the under 30's were under-represented and the oldest group were about right. However, the differences should not have too significant an impact on the results.



## 5 Key stakeholder consultation

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

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

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

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. Details of those contacted are provided in outline format in Appendix 6.

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.

### **Supermarkets**

Five supermarkets told us their customers used licensed vehicles. Three had a free phone link whereas two told us that staff would phone for a vehicle if requested by customers. No customers had ever reported issues with the service provided. All locations were aware of ranks nearby the store.



**Hotels**

Two hotels said their customers did use licensed vehicles. Both said reception would phone for a licensed vehicle if customers asked. One was aware of a rank whilst the other said they used a company. No customers had ever reported issues with the service provided. Three others did not respond, and one refused to answer questions.

**Public houses**

Four pubs told us their customers did use licensed vehicles. One said customers always made their own arrangements if they wanted licensed vehicles. Another said staff would phone if asked. Another said people usually made their own arrangements, but staff would phone if asked. The fourth venue said customers would go to the rank over the road. Three were aware of ranks, though one named a company rather than a rank. Whilst two said customers had no issues, two told us there were complaints mainly for delays arriving and for poor service from drivers. Four others did not provide any response.

**Late night premises**

Four night establishments told us their customers did use licensed vehicles. Three said that there was a mix of staff phoning or people making their own arrangements. One said staff would phone when asked by customers. One was aware of a rank, whilst another when asked about ranks said they would use a company. Two locations said customers had not reported any issues. The other two said there were issues with delays in vehicles arriving. Five other locations made no response.

**Other entertainment venues**

One entertainment venue said their customers did use licensed vehicles, which staff would call for if asked by customers. They were aware of a nearby rank and no issues had ever been reported to them by customers. The other location said their customers did not use licensed vehicles. One other location made no comment.

**Restaurants**

Two restaurants responded. One said their customers used licensed vehicles, and that people would usually make their own arrangements, but that staff would also book vehicles if asked. They were not aware of any ranks nor any issues reported about the service provided. The other location that responded said their customers did not use licensed vehicles as they were mainly people already in the park for other reasons who used their facilities while there. Six others made no comment.

**Hospitals**

No response was received from local hospitals.



**Police**

The police told us they were not aware of any issues related to licensed vehicles in the Mid Sussex area.

**Disability**

One of the several organisations contacted discussed the issue of hackney carriages at their meeting during the course of the survey, but did not have anything of significance to report, either positive or negative.

**Rail and other transport operators**

No comment was provided by other transport operators.

**Other Council contacts**

No other comment was provided from those contacted.

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## 6 Trade stakeholder views

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

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

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

In all cases, we believe it is essential we document the method used clearly and measure response levels. The Council issued all letters to the local trade, with a total of 461 letters being issued. During our trade engagement day, we encouraged drivers at all ranks to complete responses if they had not done so by that time, and the trade representatives also said they would encourage completion. By the time the consultation closed on 11<sup>th</sup> December 2017, there were some 102 responses, a very high level of 22%.

On receipt of the responses, a check was undertaken to ensure there were no obvious duplicates or any other out of course entries. None were found.

The average length of service identified was 13 years. The longest quoted was some 41 years.

The highest percentage, 36%, said they worked six days. 27% said five days, 18% seven days, 9% saying three days, 7% four days and 2% just two days. The actual average number of days worked was five. The average hours worked were 41, slightly above the normal level, with a maximum of 80 hours quoted.

73% owned their own vehicle, with just 17% saying that someone else also drove the vehicle they used.

55% overall operated as part of a company, with people naming 21 different companies which at least one person worked for. Twelve companies were only mentioned by one person, a further two only by two people, and three by three people. These accounted for 47% of the responses. The top company was cited by a third of those providing a response. The next largest company was mentioned by 12% and the third company 7%. One of the companies mentioned by two people was known as a hackney carriage only company. For the hackney carriages, 13 different companies were named.



## 7 Evaluation of unmet demand and its significance

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

For Mid Sussex in 2017 the demand profile is NOT peaky. This means that all other values in the equation are effectively at the measured level, rather than reduced to half values if the profile was peaky.

For the 2017 information, no passenger queues were observed at all during the off-peak periods observed, so the value of the index of significance of unmet demand overall is zero – i.e. there is no unmet demand in the Mid Sussex licensing area at this time which is significant.

Considering the parts of the index, the level of average passenger delay has now reduced from 0.12 minutes in 2014 to 0.083 now; the proportion of passengers travelling in hours with over a minute of delay was 12.5%, it is now 0.597%; the proportion of hours in off peak with any passenger delay was 4.7% and is now zero. The only statistic which has increased is the latent demand factor, which was 1.03 but has now increased to 1.047 for all the information collected.

However, the Hassocks station rank received significant mention that people had given up waiting there, which would increase the factor to 1.08, apart from the fact that there is no rank there, so this should not really be included. Further, the other three stations all require supplementary permits, more onerously than three years ago, so the Council is unable to influence plates to go there. This means the latent demand factor to be used in a council rank only evaluation would be 1.007; there being very little latent demand at the non-station ranks.

The overall value of ISUD (including all ranks) was 7.3 three years ago, as already noted this time the value is zero. No estimate has been made purely for the council only ranks as the off peak zero value will also imply that this index would also be zero.

## 8 Summary and synthesis

This Unmet demand survey 2017 on behalf of Mid Sussex District Council has been undertaken following the guidance of the Department for Transport Best Practice Guidance (BPG) and other recent case history regarding unmet demand and its significance. It has been undertaken using the current status of law and practise as at the end of January 2018.

### ***Background and context***

This survey is the latest in a regular set of reviews of the status of unmet demand within the District, which forms part of the two-tier authority of West Sussex County. It was undertaken between October 2017 and December 2017, with video rank observations in November, an all-trade driver survey in November and December, on-street pedestrian interviews in November and key stakeholder consultation throughout the period.

Hackney carriage vehicle numbers have been fixed at 154 since 2004. Present private hire vehicle numbers are about twice the level of 1997 whilst hackney carriage numbers have increased 18% since the same date. Driver licences remain either for hackney carriage or private hire with both groups following a similar recent pattern of some growth but very recent marginal reduction in numbers.

Most wheel chair accessible vehicles are within the hackney carriage side of the licensed vehicle trade. The current level of 19% is marginally less than the typical level held since 2001. This compares to the national average for mixed vehicle fleets of 24%. Private hire has a few wheel chair accessible vehicles. Mid Sussex is one of the earliest adopters of Sections 165 and 167 of the Equality Act.

The local licensed vehicle industry is fairly integrated between the hackney carriage and private hire elements compared to many other authorities. While there are two relatively visible hackney carriage only telephone networks, about a third of all the operators have mixed hackney carriage / private hire fleets. Competition between the private hire companies is moderate with three large companies but also 19 smaller operators many of which provide for niche markets. Most of the vehicles on both sides of the fleet tend to focus on one area, with most synergy between Hayward's Heath and Burgess Hill. However, there is less integration in East Grinstead and much higher levels in Burgess Hill / Hayward's Heath.



### **Rank observations**

There are three main differences in rank provision / usage since the last survey. The feeder rank at Hayward's Heath station has moved to a distant location with the rebuild of the station car park there. There are a new pair of ranks in The Broadway, Hayward's Heath replacing Perrymount Road, and changes in night-life have rendered all but the station rank in East Grinstead redundant, although an informal location has sprung up there.

Review of use of ranks by other vehicles saw the worst abuse by private cars at The Broadway, where 58% of observed vehicles during our survey were private vehicles rather than hackney carriages. On the contrary, only 1% of vehicles observed at or near ranks were private hire vehicles despite the mixed nature of the fleet. However, part of this relates to the clear provision of separate pick-up facilities for private hire at two of the busiest locations, and the fact that some other locations tend to see mainly hackney carriage operation of most telephone bookings.

Hayward's Heath station retains its strong dominant position in providing 56% of all estimated passenger usage at ranks in the area. The other two large stations of Burgess Hill and East Grinstead account for a further 23% and 11% respectively. This means 90% of all rank demand in passenger terms is from private ranks needing supplementary permits.

The next largest contribution of passengers at ranks is from Church Road, Burgess Hill, with some 3%, although the bulk of these are clearly telephone bookings undertaken by hackney carriage. South Road and The Broadway at Hayward's Heath both provide 2% of estimated passenger demand, as does Civic Way, Burgess Hill. The recently developing informal location at East Grinstead sees around 1%. Only South Road and Civic Way tend to operate as classic ranks with vehicles regularly waiting for custom, although even the former has a high level of apparent pre-bookings observed.

Overall demand is very similar to that three years ago. Demand profiles and levels appear similar on both Fridays and Saturdays with perhaps a bit more usage on Saturdays. The Church Road rank is used as much when it is formally not operating as when it is (but again this appears to be principally telephone demand by hackney carriages). The overall demand profile is not heavily peaked to any one time period although there are a number of peaks on both days.

Service to most ranks is good. The Library rank in Burgess Hill and the informal location in East Grinstead see fair levels of service. Overall, this is a very healthy picture.



The only wheel chair passengers observed using hackney carriages from ranks were at Church Road, Burgess Hill, although all these appeared to be telephone based, albeit using hackney carriages. Our observations at ranks found 27% of all vehicles appearing to be wheel chair accessible style, suggesting more of these vehicles focus their service on ranks in the area. Both stations have even higher proportions of vehicles, very encouraging.

The plate activity review on the Friday found 42% of the fleet active during the sample covered. The highest proportion were observed at Hayward's Heath station, followed by Burgess Hill station and then East Grinstead, approximately in order of the levels of usage. Only 5% of the plates observed were seen in more than one of the three main areas. There were also clearly a number of vehicles that focussed only on the council ranks. There seemed to be more such vehicles in this survey compared to last time which may result from the change in the permit system to requirement for a separate permit for each station.

### ***On street public views***

300 on-street interviews were undertaken with people across the area, covering all four main centres. 46% overall said they had used a licensed vehicle in the area in the last three months, increased from three years' ago. Burgess Hill had highest quoted usage and East Grinstead the lowest. However, actual usage in overall frequency terms was the reverse. The quoted usage of ranks appeared to have increased from three years ago, being 37% overall.

For those booking by telephone there was a fair level of competition, with 83% of quoted trade shared between six named companies. There is evidence that Hassocks is now much more an independent area compared to previous surveys with companies quoted there not mentioned anywhere else.

In terms of hackney carriages, they are visible but one in three said they could not remember when they last used one. The level of non-use is highest in East Grinstead and actually zero in Hayward's Heath.

People mainly knew of the station ranks and not the smaller ranks. This confirms other views that the smaller ranks are mainly places people go to meet pre-booked hackney carriage vehicles. There were no significant requests for new ranks, apart from a desire for a rank in 'High Street East Grinstead', albeit only by a very small number of people.



Issues with hackney carriages were about the same level as three years ago, and mainly not significant. East Grinstead seemed to have lower levels of satisfaction whilst there appeared to be major issues with the operations in Hassocks although given the lack of active ranks this is most likely to be more related to private hire companies than to hackney carriages.

The main item that might increase hackney carriage usage focussed on cost, with some suggestion that improved service might increase usage.

The issue of need for adapted vehicles shows no difference from three years' ago.

There was no latent demand quoted in Burgess Hill. People only had latent demand from the station rank at Hayward's Heath. Whilst the level of latent demand at East Grinstead was high at the station, there were a quarter of respondents saying they had given up elsewhere, again supporting the need for a town centre rank active there.

### ***Key stakeholder views***

Many key stakeholders as usual had formal links to private hire companies. However, a very good proportion were aware of ranks and that their customers did use them. The police felt there were sufficient vehicles and there were very few problems identified.

### ***Trade views***

The all-driver survey received a very high level of 22% response. A high level of experience was identified. Average days worked was five, with a slightly above average 41-hour week quoted. Most vehicles were owned by those that drove them, with 55% being part of a company. Hackney carriage respondents themselves named some 13 different companies, of which one was one of the known hackney carriage only operators.

### ***Formal evaluation of significance of unmet demand***

During this set of observations, no passenger queues were observed at all during any off-peak period. This means the overall evaluation is that any observed unmet demand cannot be significant at this point in time.

All other parts of the index showed reduction, i.e. improved levels of service compared to three years ago apart from the latent demand factor which had increased from 1.03 to 1.047, still a very low level. The overall value has reduced from 7.3 to zero.

## **Synthesis**

Licensed vehicle operations in Mid Sussex at this point in time seem to be generally very healthy, with good levels of customer satisfaction. There appears to have been a trend towards stability but also towards operations being kept to the four separate towns. East Grinstead tends to have the least amount of integration between the hackney carriage and private hire trades whilst Hayward's Heath and Burgess Hill tend to see more higher levels of integration, with many companies having mixed fleets. In fact, much of the council only rank operations appear to be pre-booked work, but principally undertaken by hackney carriages on telephone networks.

The revised operation at Hayward's Heath station generally seems to work well at most times, though some delays occur with the transfer time between the ranks. The new arrangement at The Broadway seems to be developing passenger usage.

The principal council only active rank is the Library rank in Burgess Hill, followed by South Road, Hayward's Heath. Church Road sees active use by hackney carriages, but none tend to use the rank to wait at all – apart from sometimes at night when ironically the rank is not formally active.

The only concern is that 90% of hackney carriage passengers come from ranks which require a supplementary permit. This implies that the bulk of hackney carriages in the area could be impacted at any time by changes outside the control of the local authority. However, there seems to be a greater focus now by some hackney carriage drivers away from such reliance, albeit at a very low overall level.

Overall, for these council ranks, most people will make a booking but usually obtain a hackney carriage for their trip. This means that most people will consider hackney carriages are the only available licensed vehicle in the area, and may well expect to obtain a hackney carriage in response to any phone-call particularly if from the Hayward's Heath or Burgess Hill central areas.

This mixed fleet operation seems to give the highest level of satisfaction. The poorest service according to the public appears to be in the area without ranks (Hassocks). There appears to be demand for more hackney carriage style service in East Grinstead where the two fleets operate more separately.



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## 9 Study Conclusions

On the basis of the evidence gathered in this Unmet demand survey 2017 for Mid Sussex District Council, our key conclusion is that there is no evidence of any unmet demand for the services of hackney carriages either patent or latent which is significant at this point in time in the Mid Sussex District Council licensing area.

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

Department for Transport Best Practice Guidance encourages a new survey within a three-year timeline.

The present limit on vehicle numbers continues to provide benefit to the public in terms of stability and good service.

There is need for a new rank in the centre of East Grinstead.

Taking on board the provisions of Sections 165/167 appears to have provided benefit to those needing wheel chair accessible services with an excellent level of use observed, albeit at a rank with principally telephone booked usage.

The planned introduction of the hackney carriage livery will provide improved definition in passenger minds of how they can get the different styles of licensed vehicles, and this needs to be backed up with education to ensure confusion is reduced, particularly given the high level of mixed vehicle companies in the Haywards' Heath and Burgess Hill areas (which seem to provide the highest levels of satisfaction).

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## Appendix 1 Industry Statistics

	hcv	phv	total veh nos.	hcd	phd	dual drivers	total drivers	Operators	% hcv WAV	% phv WAV
<b>1994D</b>	130			240						
<b>1997D</b>	138	111	249	285	120		405		12	
<b>1999D</b>	140	150	290	290	190		480	34	15	
<b>2001D</b>	135	201	336	265	210		475	36	19	
<b>2004D</b>	154	182	336	232	236		468	35	21	
<b>2005D</b>	154	195	349	204	221	46	471	30	21	
<b>2007D</b>	154	220	374	265	290	48	603	42	21	
<b>2009D</b>	154	243	397	207	289	52	548	52	21	
<b>2010N</b>	154	260	414	<u>238</u>	<u>312</u>	<u>26</u>	<u>575</u>	<u>57</u>	21	2
<b>2011D</b>	154	247	401	268	334		602	61	21	2
<b>2012N</b>	154	223	377	<u>248</u>	<u>297</u>	-	545	<u>61</u>	23	3
<b>2013D</b>	154	176	330	227	260		487	61	20	1
<b>2014N</b>	154	203	357	<u>229</u>	<u>273</u>	-	502	<u>64</u>	20	2
<b>2015D</b>	154	209	363	231	285		516	67	20	
<b>2017D</b>	154	227	381	231	299		530	72	19	1
<b>2017C</b>	154	224	378	227	294		521	69		



**Appendix 2 List of ranks in area**

<b>Rank / operating hours</b>	<b>Spaces (approx)</b>	<b>Comments</b>
<b>Hayward's Heath</b>		
South Road	5	
Broadway	2 + 2	Pair of ranks both operating 18:00 to 07:00, one near Pizza Express southbound, other near Grapes and Grain, northbound.
<b>Burgess Hill</b>		
Civic Way, behind library	10	To be revised with redevelopment of area
Church Road	2	Daytime only rank, 08:00 to 18:00 near W H Smith
<b>Hassocks</b>		
Keymer Road, Budgens	1	In lay-by alongside road – but unused
<b>East Grinstead</b>		
West View Gardens	2	Remains unused
London Road (Bliss)	1	Club no longer there
Little King St (Wetherspoons)	3	Night only – but unused
<b>Private ranks (all needing permit from railway agents)</b>		
Hayward's Heath Railway station plus feeder	11+6	Feeder now behind car park and linked to main rank by cctv system
Burgess Hill Railway station forecourt	6-10	Part issue as very near public highway so some debate about where private rank ends
East Grinstead Railway Station	4+6	
Hassocks Station	2	Lost with redevelopment of station





**Appendix 3 Hours covered by rank observations**

*See separate document*

**Appendix 4 Detailed rank observation results**

*See separate document*

**Appendix 5 – Detailed on street results**

*See separate document*

