

The Gloucester Hackney Carriage Association has, in its constitution, the following in the stated aims:

- (i) always defend the proper use of the word ‘taxi’ and protest and complain against the improper and incorrect use of that word by anybody such as Gloucester City Council, the police, the press and private hire vehicle operators or drivers.

We are very disturbed and disappointed by the report made by Mouchel after the survey it was commissioned to make by Gloucester City Council.

We have examined the report and cannot recognise accuracy nor understanding of the taxi and private hire trades in the City of Gloucester.

The following is a brief outline of our observations and inevitable criticisms.

The Mouchel report:

In the introduction –

1.2 Local background and taxi industry context

Each Taxi Licensing Authority in England supervises the operation of two kinds of licensed vehicle. The focus of the licensing authority is purely on vehicles which are not public service vehicles. The two kinds of vehicle licensed are hackney carriage vehicles (sometimes known as ‘taxis’ in legislation), which alone are able to wait at ranks and pick up people in the street (ply for hire), and private hire vehicles, which can only be booked through an operating centre and who otherwise are not insured for their passengers (often termed ‘taxis’ by the public). For the sake of clarity, this report will refer to ‘licensed vehicles’ when meaning hackney carriage and private hire globally, and to the specific type when dealing with one or other type of vehicle. The term ‘taxi’ will be avoided as far as possible, although it has to be used in its colloquial form when dealing with the public, few of whom are aware of the detailed differences.

Mouchel clearly indicate they do not understand that “taxi” is a legally defined term that only applies to Hackney Carriages and seem to want to take the lazy way out by adopting the term for Private Hire as well. We have spent so much time and effort in making all parties, especially the Gloucester public, aware of the difference that we are amazed, particularly in the process of removing the similarity in appearance caused by the roof sign debacle, that the Council would tolerate such an attitude from its chosen survey company.

The term “taxi” certainly does not have to be used in the alleged colloquial form when asking the public in Gloucester. Every set of questions should start with “Do you understand the difference between a taxi and a private hire vehicle?” followed by a brief outline if the answer should be “no” and then each question asked about “taxis” and then about “private hire vehicles”. If that procedure is not followed then how can Mouchel possibly get a clear picture? This point was clearly made to Mouchel by our chairman Zeya Ahmed when he met with Mouchel at the so called consultation day.

You will clearly see in following pages where their lazy and less than rigorous methods lead to a very vague and so completely false understanding.

On page 7:

1.3 Study objective

The principal objective of this study is to determine whether or not the number of hackney carriage vehicle licenses in the city of Gloucester should be limited. In addition GCC considers that, with Gloucester in the throes of multi-million pound redevelopment, this is an appropriate time to consider the contribution of hackney carriage and private hire vehicles to overall transport within the Council area. A review of rank provision and design was also required as well as recommendations about how the nightlife culture in Gloucester can best be served by licensed vehicles alongside the need to ensure public safety.

Another key objective of this study, alongside the need to satisfy current DfT requirements, is to ensure that the overall 'taxi' trade provides the best possible service to the public living in the licensing area, as well as all those who visit Gloucester.

1.4 Proposed study outputs and outcomes

The study follows a statistically robust methodology, underpinned by collection of a solid dataset of information, to develop recommendations which the Council can implement with confidence. The Report seeks to satisfy current DfT requirements (as outlined in the April 2010 Best Practise Guidance) and build on the clear willingness to ensure that the overall 'taxi' trade provides the best possible service to those using 'taxis' in the Gloucester licensing area.

The study concludes by setting Gloucester taxis within a "Living Strategy" capable of evolving over the next five to 10 years within the development of the new Local Transport Plan (LTP) for the area. A key output will be an Action Plan for developing the full hackney carriage and private hire industry to the benefit of Gloucester.

Only lazy and inexact people use the phrase 'overall "taxi" trade', in Gloucester we may have an overall hire trade but the difference between public and private hire is important and should only be ignored by those who would further support illegal activity and greater risk to the travelling public.

On page 9:

2 Gloucester City taxi industry statistics

Another clear indication of intent to remove considered differences and attempt to allow Private Hire to be considered as "taxis".

There are many taxi drivers who wonder if this was the intention of those who commissioned this study i.e. to get a report to support the apparent disregard of the differences when it comes to policing unlawful activity by Private Hire and so make life easier.

On pages 35-36 you will clearly see absolutely no attempt by the so called specialist survey team to ask any questions that could identify which answers apply to taxis and which to Private hire, they erroneously lump them together.

On page 39 the point is further emphasised:

4.2.1 Summary of responses

49% of the respondents had used a 'taxi' in the last three months. Of all those responding, 4% used 'taxis' daily, 7% once a week, with 30% using them less than once a month and 27% never (this is an improvement on the 85% infrequent or

never from 2002). 27% of respondents would usually telephone for a taxi and 19% would usually obtain one from a rank. 77% of respondents stated that they had no issues in getting a taxi. Hailing was insignificant to people. 36% wait an average of 10 to 20 minutes and 23% wait less than 10 minutes.

Considering ranks, the best known and used rank for those interviewed in the city centre was the bus station – 193 people knew about it, and 38 said they used this rank. The rail station had 160 people who were aware of it, but only seven said they used the rank there. The Oxeboode was least known, although even this saw 132 people of the 248 questioned say they were aware of this rank, and 10 said they used the rank there. Just 20 people knew no rank at all. For Quedgeley people, all but eight people were aware of the rail station rank, and 15 of the 50 questioned there said they used that rank. Quite a few people in Quedgeley were aware of the bus station rank, but very few knew of the Oxeboode. Overall, this suggests ranks are well-known in Gloucester.

Some 106, (43%), of those interviewed in the city centre provided names of companies who they phoned when needing a taxi. The hackney carriage company and the largest private hire company were the two most common responses. The hackney carriage company had the largest number of people saying they just used their services only. One other company was mentioned by over 20 persons, although mainly in conjunction with other companies.

Of the 298 persons interviewed, just 27% (81 people) had problems with the service. The main problem quoted with the local taxi service, for 53 of those having a problem, was related to the design of the vehicle. Vehicle cleanliness was an issue for 29 people (of whom 13 also had an issue with design) and 18 cited driver issues. Rank location was a problem for 13 people. None of the issues clearly related to particular companies used, being spread across the 'taxi' industry.

Nearly half (48%) of respondents stated that cheaper fares would encourage them to use taxi services more often whilst 20% suggested better vehicles. More vehicles accounted for just 5% split almost equally between hackney carriage and private hire vehicles.

Only 7% of respondents believed the quality of the taxi service overall was excellent, 42% believed it was good and 19% believed it was average.

74% of all respondents had regular access to a private car and 84% were local residents

In order to validate the survey data obtained, a comparison between the percentage of people surveyed in relation to age and gender and the 2006 projected statistics for 2010 has been carried out in **Table 4-1** below:

You can count the highlighted number of times the word “taxi” has been misused.

Now you can continue reading the report and count for yourself how many more times Mouchel incorrectly uses the word “taxi”. We believe you would be annoyed if we continued to present them all, it would be pointless because you must, by now, certainly have understood the point.

On page 41:

All bars and clubs had either a contract or a 'Gentlemens' agreement with a private hire operator for customers to book a taxi at the establishment. Liquid Diva has a contract with one operator. A club employee with a fluorescent yellow jacket was identified outside the entrance and inside the lobby area walking around with a clipboard and asking customers as they left the club whether they needed a 'taxi' to get home. The employee had a radio which was used to speak to drivers as and when a vehicle was needed. Instead of waiting outside the club, private hire drivers would wait in the GL1 car park located at the rear of Liquid Diva and drive around when summoned. People who did not use the booking system being offered would wait at the rank for a hackney carriage. This was overseen by two club employees acting as Marshalls.

Here is clear evidence of offences that are certainly being ignored by the enforcement team. What are you going to do about it – or are you happy with Private Hire vehicles obstructing the highway and their agents lying to the public when offering a “taxi”? The abuses to the so called in house booking scheme are prevalent and ignored by the Police and the City Council.

During our visit, few hackneys waited at the Eastgate Street rank which meant that a queue of perhaps six to eight people would emerge every 10 to 15 minutes to wait for a hackney. As people would usually be in a group, most of the queue would be catered for by one vehicle, and would soon leave the area.

At the time of the survey, access to the Eastgate rank was always difficult and it was common practise for the Police to use it as a parking space along with many private cars. Little wonder that taxis did not choose to waste time and fuel driving round to see if they could get on the rank or not. Remember, because of the set up of the roads and no u-turn regulations, approaching the Eastgate rank is no short and simple matter. Now that the rank is kept clearer and most of the obstructing traffic is better managed more taxis use and service the Eastgate rank – much to the annoyance of the still unlawful on street touting by the Private Hire agents sponsored by Liquid Diva.

The funding for the marshals on the Eastgate Rank runs out in March. You may like to consider applying the huge fee demanded by Mouchel to further funding for the Eastgate Rank. It would certainly be of better value to the people of Gloucester. After all, it is very clear that Mouchel have not earned a single penny as they have clearly failed.

We note the later comments about taxi and Private Hire numbers and ask you to remember two things.

- 1. There has never been any limit on the number of Private Hire licenses, you have no control on the number.*
- 2. It has been clearly demonstrated in the past that the prime reason for issuing extra taxi licenses has been because the members concerned couldn't get a car on the phone. In other words taxi licences have been issued for Private Hire purposes. It has never been a secret that the idea of taxis who work just as taxis and don't want to be on a phone/radio service are of little if any concern to anyone involved in considering taxi numbers.*

Taxi Ranks.

It should be obvious to anyone who truly understands taxi business, not only in Gloucester but nationwide, that there have been discussions and litigation about access to railway stations.

The railway station in Gloucester is not a public taxi rank. Access is gained by a limited number of taxis who pay a large fee to get the monopoly. Gloucester City Council is not only aware of this but chose not to act in any way to persuade the rail operator not to reintroduce the scheme after the short period when that permit scheme was stopped and during which the

rail passengers were served better than at any time during the scheme's operation. If there is any deficiency in the service at the railway station it is none of the council's nor the taxi trade's responsibility.

Therefore what goes on, or not, at the railway station should not be considered in the survey. Certainly the business there should never be included in any analysis or recommendation.

However we cannot fail to notice Gloucester City Council's ardent desire to further promote Private Hire business with the suggestion to have a phone link to call on cars when there are no railway permit holders available. (see the action plan)

The strange thing is that the first rank talked about in every section of the Mouchel report is that at the railway station. How can this report have any shred of credibility?

Remember, the discredited MCL report was distorted by counting the failures at the railway station and here, yet again, that error is repeated.

Survey Hours.

According to Mouchel there are only three days to be considered, taxis don't work before 10.00 a.m. nor after 4.00 a.m. You can use cameras and guess, sorry deduce, what may or may not be happening.

Disabled.

According to Mouchel you are only disabled if you are in a wheelchair. How many of the vast majority of the registered disabled who do not use wheelchairs were served? How many of these would be disadvantaged by the type of vehicle used for wheelchairs? How many of the majority of registered disabled did Mouchel interview? Did Mouchel even consider that majority?

Customer Waiting.

Did Mouchel observe anyone waiting on a taxi rank while taxis were present? Did they ask why? How could they with a camera?

Some people wait for friends, some people wait for taxis with larger passenger capacity and some just like to talk outside the kebab shop. There are also people who have arranged to be picked up by friends or family – did Mouchel distinguish those from other waiting people? Only people who understand the trade would know this. Mouchel....???

Conclusion.

This survey was done in a sloppy, lazy and totally unprofessional manner.

Maybe it says what those commissioning it wish to hear, but is of no value to anyone who wants to better understand the trade.

Taxi drivers who worked on Grosvenor Rank remember well waiting longer between jobs on the short times chosen on the three days chosen by Mouchel.

Taking the easy way out when asking questions, not understanding the problems, doing the survey at a time of controversy because of the then continued use of roof signs by Private Hire, calling the railway station situation a main rank and considering the minority of registered disabled people to be the majority concern shows that Mouchel is not capable of doing the job it should have.

Don't accept the survey and don't pay for a bad job not worth being done by such as Mouchel.

Maybe it's because of the Mouchel's of this world that led Mark Twain to say:

“There are lies, damn lies and statistics.”