

LICENSING COMMITTEE

Hackney Carriage Licensing Survey

Report of Executive Member for Housing & Licensing

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21 October 2025

Executive Summary

The purpose of this report is to inform Members of the outcome of a survey to measure demand for hackney carriages within the Borough.

Recommendations

That Members:

- 1) Note the report; and
 - 2) Decide whether to retain the current limit of 85 hackney carriage vehicles in the Borough
 - 3) Decide whether more wheelchair accessible vehicles (WAVs) are needed on the fleet either in addition to existing vehicles or brought on when saloon vehicles are replaced
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1. **Purpose of the report**

The purpose of this report is to inform Members of the outcome of a survey to measure demand for hackney carriages within the Borough.

2. **Background**

- 2.1 Current hackney carriage, private hire and operator licensing is undertaken within the legal frameworks first set by the Town Police Clauses Act 1847, amended and supplemented by the Transport Act 1985 (S.16) in regard to hackney carriage vehicle limits, and by the Local Government (Miscellaneous Provisions) Act 1976 for private hire vehicles and operators. 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, drivers or operators can be limited.
- 2.2 The Department for Transport (DfT) Best Practice Guidance, most recently revised in November 2023, seeks to provide information to the licensing authority to meet S.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 unmet demand for the services of hackney carriages within its local area, which is unmet”.
- 2.3 The Council has commissioned an Unmet Demand Survey to be undertaken in line with the DfT Best Practice Guidance every 3 years. The last survey due to be undertaken was started in early 2020 but was discontinued following the country going into a national lockdown.
- 2.4 The most recent survey prior to this year was carried out in 2017 and was carried out by Ian Millership from CTS Traffic & Transportation. Mr Millership has carried out the previous surveys in 2011 and 2014 and was commissioned to carry out the 2025 survey to provide a level of consistency in how the study is conducted.

3. **Methodology**

- 3.1 The following methodology was used to conduct the study:
 - Review of relevant policies, standards etc. to understand the authority’s aspirations for meeting travel needs and social inclusion and provide context to determining overall demand for travel and how this should be met
 - Extensive rank observations including monitoring passengers waiting time, any illegal plying for hire, use of hackney carriages by wheelchair users and levels of vehicle activity
 - On street interviews: a survey of 250 representative people on street to obtain information about their understanding of the sector, their last taxi journey, their overall levels of taxi use, about quality and barriers to use
- 3.2 The above methodology mirrors that used in the previous survey but also incorporates developments in methodology since the last survey, particularly guidance from the DfT’s 2023 Best Practice Guidance.

4. Consultation

- 4.1 Consultation took place with key stakeholders and the trade. There was a total of 134 trade responses which is significantly higher than in previous surveys (47 in 2020 and 41 in 2017). This may be explained by the sharp increase in the total number of licence holders in 2025.
- 4.2 91% of hackney carriage respondents and 49% of private hire agreed the numbers of vehicles should continue to be limited.
- 4.3 Most of the comments about benefits of the limit being retained related to the excess numbers of vehicles. Specific benefits quoted were 'experienced drivers, reduced congestion and better service'.

5. Overall Conclusions

- 5.1 The survey was carried out between March and June 2025 with the rank and on-street public consultation in April, driver surveys through April and May, and key stakeholder consultation throughout the full period.
- 5.2 The number of hackney carriages has remained at 85 since at least 1994 although private hire vehicle numbers have increased significantly, as have driver numbers.
- 5.3 Oldham is one of the two Greater Manchester authorities that does not currently stipulate all hackney carriages should be WAVs. The level of these vehicles was around 25% of the fleet in 2013, but this has now reduced to around 14% as of the last few years.
- 5.4 The estimated 2025 average weekly level of passengers is 4,403. This is 53% lower than in 2017.
- 5.5 The level of observed WAVs in the survey was 11% which is very similar to the 14% that exist in the total fleet. The level of usage of these vehicles was up to 7 people using wheelchairs, compared to the 4 observed in 2017. The level of people assisted into vehicles has increased significantly from 18 in 2017, to 98 in 2025.
- 5.6 In terms of scoring aspects from interviewees, 'good' was the most dominant score with the highest 'good' scores for vehicle cleanliness and driver professionalism.
- 5.7 24 people took time providing further detail for those aspects they had rated 'very good'. The further details were as follows:
 - Great service
 - Very reliable
 - Polite drivers
 - Drivers know the area very well
 - Neat and clean
 - Very helpful and polite
 - Always on time
 - Minibus service always professional

- Vehicles old but good
- Very cheap

5.8 The index of significance of unmet demand is at the highest it has been in the last 3 surveys at 8.87 but remains a long way from the industry accepted level of 60 that would suggest the unmet demand was significant.

5.9 On the basis of the evidence gathered in the survey the key conclusion is that there is no evidence of any unmet demand for the services of hackney carriages which is significant at this point in time.

6. **Options**

6.1 Members are asked to consider the outcome of the study report and relevant guidance and have the options of:

- a) retaining the limit of 85 vehicle licences
- b) releasing a set number of licences (possibly as WAVs)
- c) lifting the quantity restrictions altogether

6.2 Members should note the Council's current Taxi & Private Hire Vehicle Licensing Policy position is as follows:

"All hackney carriage vehicles must be purpose-built and wheelchair accessible by 31 December 2029. Until that date, a mixed fleet of saloon and WAVs will be permitted".

7. **Response from Oldham Hackney Association**

7.1 Trades response as follows its may be not in sequence as as author written in its reports .

We as trades representatives thankful to Oldham councils that initiated this survey to establish the unmet demands is significant or not which usually the cost survey is paid by my members this time Oldham council paid 25% fee towards this survey which was really appreciated .

Reports writer's clearly stated that there is no significant unmet demands in Oldham Oldham council free to retain the number 85 which beneficial to public plus trades as well service was counted as good .

The conclusion is no significant unmet demands in Oldham .

Most importantly that mixed fleets in Oldham working effectively and meeting customers needs according to equality Act 2010 .

As Greater Manchester authorities proposing all black cabs by 2030 we as trades feels that is not possible to achieve that goals because black cabs at present the price of £70k by 2030 that will be over £100k even second hands vehicles price is unaffordable in Oldham because Oldham town centre commercial activities are very poor so 100% black cabs not possible to achieve this target in Oldham only best things is to have mixed fleets mostly vehicles

are environmentally friendly at present and in future 100% electric saloons vehicles depending on price of electric vehicles.

Survey back ground and methodology and its significance,

Report writer have given depth details trades thinks that is adequate and sufficient we don't want add any things extra or repeats the same again and he given full details in development and legislation and practice including equity Act 2010.

Case law and unmet demand,

Three cases council took the courts and trades wins all three because survey were carried out and there was no significant unmet demands and they meets the conditions of 1985 transport Act .

We in Oldham had major advantages that our dual badge is allowed to hackney carriages vehicles price or private hires vehicles , triple lock licensing clearly states that all three should be from same councils but unfortunately licensing allowed if driver badge and plated outside Oldham but work with local operators that is acceptable but we as trades feels that is not fair to our trades and encourage them to carried illegal works as well (plying for hires and parked and pick the customers from ranks as well most of time they parked parallel with hackney rank in Waterloo street and some park in front of hackney vehicles all these issues were raised regularly to licensing, councils but so these drivers continued working on these spots .

Local background and context,

This give the basic details that how the contract the survey company asked them regarding unmet demand survey and author given the Oldham history and it's population and different locations of Oldham areas

Out of total population 1.9 % used taxis because private cars numbers are increasing significantly it is imperative to note that our trades facing difficulties .Oldham council is part of Greater Manchester transport hub bee network killed our business due to lowest fare prices ie £2 for Manchester as I given information that London black cabs and Brimingham black drivers giving black cabs due to private hires vehicles are increasing at very high rates now LFT proposing put the caps on private hires vehicles otherwise black cab in both areas completely finish similar situation is developing in the Oldham as well .

Hackney trades is on it's knees that out 85 hackney 54 working on private operators systems which clearly shows that ranks works are diminishing we needs helps to address this problem on war footing rather putting under the carpet by doing this it will multiple the problems as our feeder rank causing major problems that private car , private hires cars and delivery drivers causing mayhem on ranks trades continuously communicating with wardens and send emails to Jemmy only get ready made cross-pounding printed emails in last and present survey reports clearly indicated this problem I f no bodies take responsibility where we stands .

Taxi statistics,

Previous two surveys clearly showed that hackney carriages meeting no unmet demands problems like present one but private hires numbers are significantly increased which is very detrimental to hackney trades .

Now Oldham council allowed private hires drivers bring wheelchairs assessable vehicles to work in Oldham no distinguishing left and make Hackney under valued .

History of demand survey in Oldham,

During lockdown period few ranks were introduced in Oldham but not much work available on ranks and night economy hit the hardest several night clubs and pubs were closed down due lack of public interest only one night clubs available in Waterloo street unfortunately this rank is flooded with private hires vehicles leaving little work for Hackney drivers our complaints dropped on deaf ears and illegal works continue near the nightclub.

Due to poor night economy several ranks abounded like St Mary ,Lord street and near tram stations mumps bridges and integrated centre with disabled people's places at present only three ranks commercially viable , Royton, Tommyfield and Yorkshire streets in town centres and upper mill rank not suitable place.

Present survey 2025 rank Hackney movement was good customer were not wait long vehicles were available immediately but during working hours drivers were waiting for customers over one hours or more particularly in the morning was over 1.5 hours waiting time which creates problems to Hackney drivers live hoods .

if you look ranks activities at present time (2025) there is significant reduction in customers numbers (page16)if these 4 ranks not working hackney drivers bankrupt. You can see yourself customers flows reduce by half comparing surveys of 2017 (page 18)

Waiting time slightly increase due too many hackney vehicles working on radio systems due to poor follows of customers on the ranks many customers come near the ranks they already booked private hires vehicles or uber they wait near the cameras installed near the ranks can't differentiate the customer waiting for hackney vehicles or private hires vehicles.in these majority peoples walk away for good health reasons not any others reasons

General public views ,

Report writer used experience qualified persons asked the questions and write down the answers correctly sample was about 250 peoples with different age groups plus drinking alcohol during the interview time peoples said they used hackney plus private hires vehicles but majority used private hires vehicles may be due to price differences these statistics not properly tabulated they mixed figures that can be seen and draw the conclusion in our opinion that were very satisfactory no alarming situation and page 26 just general information nothing else but general score ing was good and vehicles cleanliness good and drivers were professional and knowledgeable but price was in question only 3% which can be ignored Royton ranks poor scores due to driver behaviour which

completely surprised me mostly drivers who work Royton ranks well dressed , well spoken and very good knowledge of their destination (So trades representative not agreed with the reports writers)

5 key stakeholders consultation,

As stakeholders answered and response were kept in secret that is fine with us we don't want to explore it further .

Trade stakeholders views,

No comment !

Because all pages are self explanatory with fine details written which licensing officials and committee members can read or wish to make any observations they are entitled to we have no objections.

Evaluation of unmet demand and its significance,

This information based on over 3/4 pages with fine details and writer analysis that there's no unmet demand significantly present and council can retains the present limits (85 hackney plates) in Oldham and can defended if necessary in courts .

Summary,

This is written over pages with fine details plus statistically relevant figures and findings which show that every things is perfectly balanced no doubt writer analysis the figures very carefully left no hiccups for the reader of this reports.

Public views,

Very satisfactory the service provided in Oldham areas with hackney vehicles but private hires drivers made the situation muddy that needs addressing by the licensing and councils .

Page 50 to 53

General information regarding hackney trades but writer expressed concerns regarding private hires drivers which making difficulties for hackney traders that needs to address by council official and make public aware of licensed vehicles which is working in Oldham areas they must understand the difference between the twos

Recommendations,

Mr Millership and his colleagues reached t to the decision that during this survey there is no evidence of any unmet demand for the services of hackney carriages either patent or latent which is significant in Oldham licensing areas. The committee is therefore able to retains the present limits levels (85) and improving the feeder ranks position immediately . We as a trade hope committee made the decision wisely and retained the limits 85 which is beneficial for hackney drivers and councils too thanks

A R khayal Chair

Board member nphta

Zafar Iqbal directors

Mohammed Israr director

8. Legal Comments

8.1 Before a local authority can refuse an application for a vehicle licence in order to limit the number of licensed taxis, they must be satisfied that there is no significant demand for the services of taxis within the area to which the licence would apply which is unmet. If the local authority are thus satisfied, a discretion as opposed to an obligation, arises to refuse the grant of a licence, but if the local authority are not so satisfied, they cannot refuse to grant a licence for the purpose of limiting the number of licensed taxis and are thus obliged to grant it.

8.2 It is important to note that local authorities have an unfettered discretion to increase the number of hackney carriage licences they issue and case law has confirmed that any such decision to increase the numbers should not be judged in an over-refined or over-legalistic way. If the Council wishes to maintain the existing policy of limiting the number of hackney carriage licences it must be satisfied that there is no significant unmet demand for extra taxis. For the Council to be so satisfied, there must be some evidence on which to base that decision. (A Evans)

9. Co-operative Agenda

9.1 Not applicable

10. Environmental and Health & Safety Implications

10.1 None

11. Equality, community cohesion and crime implications

11.1 None

12. Equality Impact Assessment Completed?

12.1 No – not required

13. Key Decision – No

13.1 Key Decision Reference - N/A

14. Background Papers

14.1 None

15. Appendices

15.1 LVSA Unmet Demand Survey 2025