LVSA

Oldham Council
Unmet Demand Survey

August 2025

Executive Summary

This report title has been undertaken on behalf of Oldham Council following the guidance of the November 2023 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.

Encouraging signs from this survey include that service to those needing adapted vehicles appears to have increased, with increased usage by such customers of vehicles at ranks. Respondents took time to provide compliments about the service provided, with the overall service counted as ‘good’.

The full trade continue to support the limit policy, which continues to provide stability to the trade and therefore overall public benefit. Activity by hackney carriages on both phone and app bases is a positive and future-proofing move although its impact on rank service (particularly at Royton) has been negative, which needs care.

The overall level of usage of licensed vehicles has actually increased arising from the strong competition and move to use of more recent methods of getting vehicles, at the expense of overall rank usage, which is a national trend, however as noted above, the local hackney carriage trade has provided a healthy response by taking advantage of these methods as they are legally allowed to do.

Trade and public alike seem to be at best confused by how they can get licensed vehicles, with some recent private hire entrants appearing to advise us they consider they can pick up at ranks, and some public also believing the same.

The overall conclusion is that there is no evidence of any unmet demand for the services of hackney carriages either patent or latent that is significant at this point in time in the Oldham licensing area. Further the limit appears to be providing public benefit. The committee can therefore retain the limit and also defend this if it so chooses.

The marginal increase in the values within the formal industry standard test of significance of unmet demand suggests that the spare plate available should be retained and made available.

An issue remains with enforcement, particularly of feeder ranks, which are critical to efficient operation of ranks; review could occur with other authorities who have used technology to good effect.

Very strong benefit could be obtained in publicising widely the good views that customers have of the overall service provided in Oldham, particularly to those needing adapted vehicles of various kinds. This could be part of a wider public education that could also cover the issue of how people can legally get licensed vehicles of all kinds in the present licensing framework.

Feedback to the region's mayor of these results would be beneficial.

A further survey should be planned, with rank work no later than April 2030, and preferably earlier, although the expected changes in licensing arising from the latest Government review and political reorganisation may amend this need.

This Report clearly demonstrates the benefit in whatever future might develop of having statistical and empirical evidence about the operation of the licensed vehicle service and the mayor should be encouraged to consider including such review in any future licensing approaches.

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1 General introduction and background

Oldham 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.

The Best Practice Guidance

This review of current policy is based on the Best Practice Guidance produced by the Department for Transport in November 2023 (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".

The revised and updated version of the BPG published in November 2023 made significant revisions and additions to the overall guidance to licensing authorities and followed a wide consultation on its Draft version. It supplements and complements the "Statutory Taxi and Private Hire Vehicle Standards" (STPHVS) of 23rd July 2020 but in essence retains much of the material content regarding unmet demand and its review from its 2010 predecessor.

Background

Current hackney carriage, private hire and operator licensing is undertaken within the legal frameworks first set by the Town Polices Clause Act 1847 (TPCA), amended and supplemented by various following legislation including the Transport Act 1985, Section 16 in regard to hackney carriage vehicle limits, and by the Local Government Miscellaneous Provisions Act 1976 with reference to private hire vehicles and operators. This latter Act saw application of regulation to the then growing private hire sector which had not been previously part of the TPCA. Many of the aspects of these laws have been tested and refined by other more recent legislation and more importantly through case law.

Beyond legislation, the experience of the person in the street tends to see both hackney carriage and private hire vehicles both as 'taxis' – a term we will try for the sake of clarity to use only in its generic sense within the report. We will use the term 'licensed vehicle' to refer to both hackney carriage and private hire. This is contrary to the BPG suggestion that 'taxis' should refer to hackney carriages and private hire should be called such, principally because our work with the public finds them (as noted above) believing 'taxis' to be both private hire and hackney carriage.

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

The most recent reviews were by the Office of Fair Trading in 2003, through the production of the BPG in 2010, the Law Commission review which published its results in 2014, the Parliamentary Task and Finish Group which reported in September 2018, the Government Response in February 2019 and the consultation on "Protecting Users" which closed on 22 April 2019. STPHVS was published in July 2020 with the revised BPG in November 2023.

Other groups have provided their comments (including the Urban Transport Group, Competition and Markets Authority and the International Association of Transport Regulators) but the upshot remains no significant change in legislation from that already stated above with reference to unmet demand.

With respect to the principal subject of this survey, 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 same horizon also be used for rank reviews and accessibility reviews. The latest BPG seeks to tie the timeline for refreshing reviews with Local Transport Plan revisions although these do not follow the strict five-year review process as the BPG appears to assume.

The present background to policy

A trend occurred seeing a good number of licensing authorities removing their limits on hackney carriage vehicle numbers in favour of 'quality control' essentially requiring all new hackney carriages to be wheelchair accessible. A consequence of this was that saloon style vehicles were effectively limited and often gained 'grandfather' rights to remain as such.

The present issue of significant pressure on operating costs within the industry is now leading to individual drivers seeking to minimise their use of more expensive to maintain WAV vehicles. This is putting pressure on WAV only policies as well as often worsening service to those needing these vehicles most. The issue is further complicated by these vehicles often all being the most polluting diesel style vehicles with an even higher cost related to any replacement of them with more sustainable fuel styles.

Attempts to encourage sustainable fuel vehicles in the hackney carriage fleet are hindered by the relative paucity of WAV purpose-built or adequate conversions that are also sustainably fuelled. One other make is now becoming available which is easing the issue, but they remain expensive to invest in. Wider consideration of overall disability issues also means in some cases mixed fleets are more in favour – such as in Oldham, although a recent consideration saw the idea that all Greater Manchester hackney carriages should be fully WAV.

The latest BPG now encourages distinction between hackney carriage and private hire vehicles to focus on private hire only being distinguished from private cars by having their rear licensing plate, although not all authorities agree with this stance. In general, hackney carriages have roof signs although some authorities do allow roof signs on private hire, some as long as they only advertise the company and do not say 'Taxi' and others by having the sign at right angles.

For Oldham, the current identifying features are that hackney carriages must display a roof sign and a mandatory door sign with its plate number marked on it. They have white plates fixed to the rear of the vehicle. Private hire can be any colour vehicle, cannot be purpose-built or black cab style, cannot display a roof sign, but have small yellow mandatory door signs telling the public the vehicle is a private hire vehicle which must be prebooked with the operator or that journey is not insured. The council website states "the main difference between hackney carriage and private hire vehicles are the way in which they are obtained. Private hire vehicles must be booked in advance by a licensed private hire operating company, whereas hackney carriages can be hailed in the street or can wait and be hired at an approved rank without needing to be pre-booked.

Unmet demand and its significance

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 (now potentially up to five)years.

In recent years, more authorities with limits have chosen to remove them, or state that they propose to do so. More significantly, several changes to create larger authorities (e.g. North Yorkshire creation) have also led to the removal of limit policies even if the authority retains hackney carriage zones for other reasons. Very few of these have made this change without considering the demand / supply issues before, although some (notably West Suffolk) have undertaken surveys and considered their zone mergers using empirical data.

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 2023.

The BPG provides 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 five 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".

Recent developments in legislation and practice

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. There remains no confirmation of any timetable for instigating the remainder of the Equality Act.

The fact that many authorities did not introduce the WAV list voluntarily has led to a Private Members Bill which made this mandatory. It must be reiterated that the proposal to require any authority with limited numbers of hackney carriages and a mixed vehicle fleet issue extra WAV style vehicles to ensure the fleet had a certain proportion of WAV has never been implemented.

The STPHVS requires update to be provided to the DfT in regard to:

- Production of a comprehensive policy document
- Review of CCTV mandation and value
- Documentation of passenger complaints.

The other 2022 Private Members' Bill related to making mandatory the requirement for usage of the NR3S database for refusals, revocations and suspensions by all English authorities.

These two 2022 Acts are the "Taxis and Private Hire Vehicles (Safeguarding and Road Safety Act) (31 March 2022)" and the "Taxis and Private Hire Vehicles (Disabled Persons) (28 June 2022)".

Case law and unmet demand

In respect to case law impinging on unmet demand, the two most recent cases were in 1987 and 2002. Three other cases, each with novel twists, occurred in 2019 (see below).

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).

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

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

Current status regarding unmet demand studies

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

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

During September 2018 the All-Party Parliamentary Group on taxis produced its long-awaited Final Report. There was a generally accepted call for revision to taxi licensing legislation and practice, including encouragement for local authorities to move towards some of the practical suggestions made within the Report. The Government has broadly supported the recommendations of this Task and Finish Group.

Despite some opposition from members of the group, the right to retain limits on hackney carriage vehicle numbers was supported, with many also supporting adding a tool which would allow private hire numbers to be limited where appropriate, given reasonable explanation of the expected public interest gains. This latter option is now being taken forward in Scotland, with two studies published and the Scottish Government preparing guidance, although the Government response did not support this option.

As already stated, other groups have provided comments giving their views about licensing matters but the upshot remains no change in legislation from that already stated above. The Scottish Government are moving forward in terms of their application of the potential limiting of private hire vehicle numbers but this is specific to Scottish law and not presently relevant to the English licensing authorities.

Current concerns regarding the large volumes of non-local authority vehicles and drivers working well out of their areas have led to Government promise of action. The present thought is to shift the licensing function to the level of transport authorities, covering larger regions, but the exact application of this is as yet a long way from being known.

Conclusions

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. Further, the jurisdiction focusses on the vehicles, drivers and operators but rarely extends to the physical infrastructure these use (principally ranks).

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

Drivers can either be split between ability to drive either hackney carriage or private hire, or be ‘dual’, allowed to drive either kind of vehicle. Whilst a private hire driver can only take bookings via an operator, with the ‘triple-lock’ applying that the vehicle, driver and operator must all be with the same authority, a hackney carriage driver can accept bookings on-street or by phone without the same stipulation required for private hire.

Recent legislation needing clarification has some operators believing they can use vehicles from any authority as long as they are legally licensed as private hire. At first, under the 'Stockton' case, this was hackney carriages operating as private hire in other areas (cross-border hiring). More recently, under the Deregulation Act, private hire companies are able to subcontract bookings to other companies in other areas if they are unable to fulfil their booking, but the interpretation of this has become quite wide.

The 'triple lock' licensing rule has also become accepted. A vehicle, driver and operator must all be under the same licensing authority to provide full protection to the passenger. However, it is also accepted that a customer can call any private hire company anywhere to provide their transport although many would not realise that if there was an issue it would be hard for a local authority to follow this up unless the triple lock was in place by the vehicle used and was for the area the customer contacted licensing. There is suggestion that change might require at least one end of the journey to define the authority in which the vehicle operating that journey must sit.

Further, introduction of recent methods of obtaining vehicles, principally using 'apps' on mobile phones have also led to confusion as to how 'apps' usage sits with present legislation.

All these matters can impact on hackney carriage services, their usage, and therefore on unmet demand and its significance.

2 Local background and context

Key dates for this unmet demand survey for Oldham Council are:

- appointed Licensed Vehicle Surveys and Assessment (LVSA) on 10th February 2025
- in accordance with our proposal of early February 2025
- as confirmed during the inception meeting for the survey held in early March 2025
- this survey was carried out between March and June 2025
- On street pedestrian survey work occurred April 2025 (on a Thursday, Friday and Saturday)
- the video rank observations occurred early April 2025
- Licensed vehicle driver opinions and operating practices were canvassed using an electronically available survey during April and May 2025
- Key stakeholders were consulted throughout the period of the survey
- A draft of this Final Report was reviewed by the client during August 2025
- and reported to the appropriate Council committee following acceptance by the client.

Oldham Council is a metropolitan borough authority, and in terms of background council policy able to determine its own rank provision and transport policy although working within the Greater Manchester combined authority area with reference to overarching transport policy.

The authority has a current population of 246,130 using the 2023 estimates currently available from the 2021 census. This is 1.7% up on the value at the 2021 census, which was 5.1% increased over the previously quoted 2017 value based on 2011 in the previous survey, which was itself 0.7% up on the 2014 estimate. This suggests a high level of correction of actual population with the 2021 census collection.

The area has several smaller urban centres at Failsworth, Chadderton, Royton, Shaw, Uppermill and Lees. These are all part of the extensive area covered by this authority lying on the northern edge of the Greater Manchester conurbation (with nine other authorities included). The area has borders with Manchester to the West, Rochdale to the North, Tameside to the south and West Yorkshire / Derbyshire to the East.

With reference to other available statistical information, the proportion of people at the census travelling to work by taxi was 1.9%, compared to the North West average of 1.2% and the English average of 0.7%. Car ownership at the census was 1.12, lower than either the North Western (1.20) or English (1.25) values.

With reference to residents with disability, those with day to day activities limited a lot are a lower proportion than the North Western value (8.6% compared to 8.9%) but both are higher than the English 7.3%. The same is true for those with day to day activities limited a little. For those with long term physical or mental conditions that do not affect their day to day activities, the Oldham share is lower at 5.6% than either the regional (6.7%) or English value (6.8%).

The proportion with no long term physical or mental health conditions is correspondingly higher at 76.1% than either the regional (73.8%) or English level (75.9%). These figures all suggest lower need for adapted vehicles here than in the region or England overall.

In terms of background council policy, Oldham Council has all planning, transport policy and licensing powers under its auspices, although it is also part of the larger Greater Manchester authority, formerly the county of Greater Manchester as explained above. Execution of the local transport policy is within the gift of each separate authority with monitoring undertaken by Transport for Greater Manchester, and each authority inputting to the Greater Manchester Combined Authority. Highway matters are partly assisted by a partnership with a private company.

The Oldham Transport Strategy and Delivery Plan (OTSDP) has a publication date of 2 November 2022. This supports the aims of the Greater Manchester Transport Strategy 2040 to have "world class connections that support long-term sustainable economic growth and access to opportunity for all". It also has ambitions aligned to the Oldham Corporate Plan 2022-2027.

In section 2.7, third paragraph OTSDP states "taxis / phvs provide invaluable transport services at times when public transport is not an option for some vulnerable groups. These services can be especially valuable in enabling people with restricted mobility to access key amenities or health services." An overall aim is providing quick, cheap and easy transport to every part of the City region.

2022 saw submission of the Places for Everyone Joint Plan which mainly aligns with strategic housing allocations. A related concern is that access to employment sites can be challenging where public transport provision has limited frequency and spares overnight services that are often needed. It references that 23% of Oldham households do not have access to a car or van.

Oldham Council will work with TfGM to support the development and roll-out of Mobility-as-a-Service (MaaS) ensuring disabled and vulnerable users are accommodated. This will be allied with development of travel hubs.

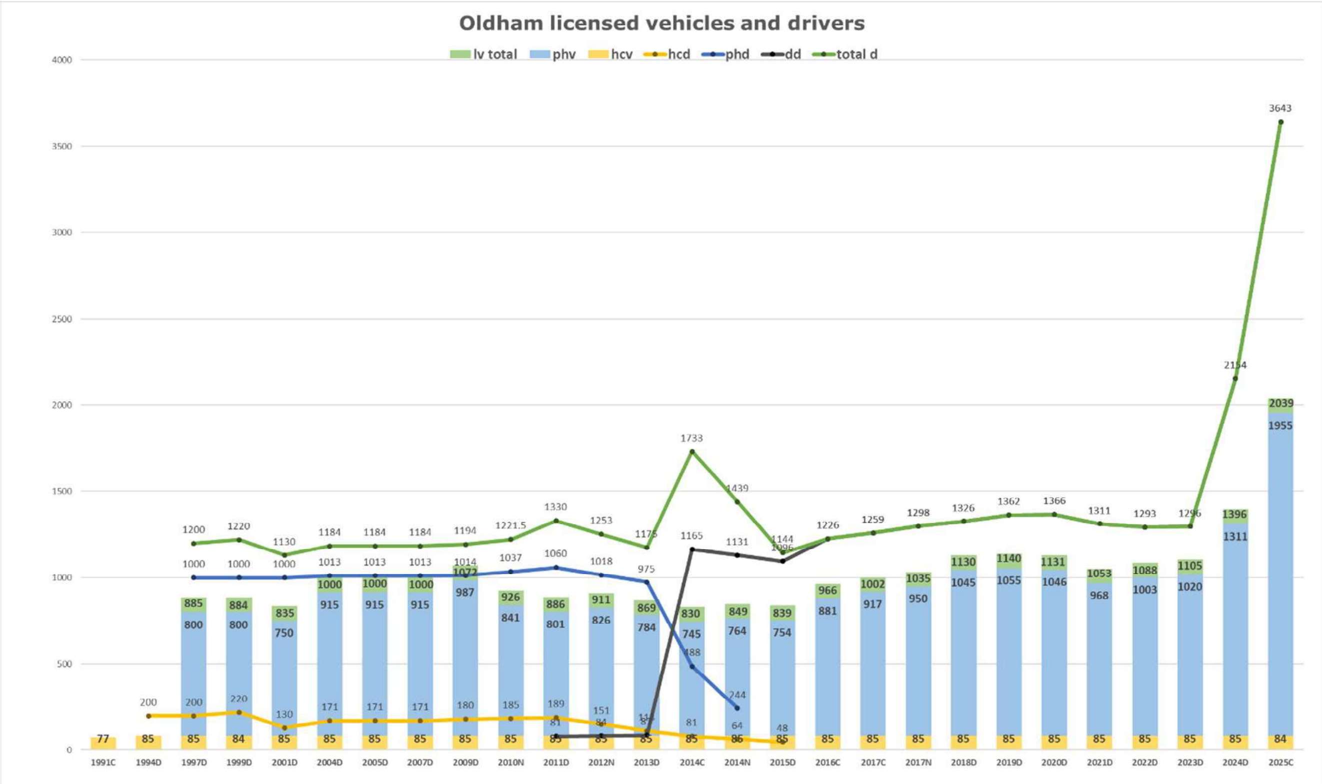
The detailed section on taxis and private hires in LTP3 (which ran to 2026) does not appear to have been replicated in the latest document. The current TfGM five year Transport Delivery Plan and the Greater Manchester Transport Strategy 2040 form the statutory Local Transport Plan for the area. The integrated section of the current network policies references Policy 1 "Policy 1 - Taxis, Private Hire, DRT: We will work with partners to ensure that modes of transport such as taxis, private hire vehicles and other demand responsive services - as well as shared mobility solutions, including car clubs, cycle hire and other forms of shared transport - are available, and fully integrated into the Greater Manchester transport network". Policy 28 states "Taxi and Private Hire Standards: We will work with the taxi and private hire industry to develop minimum standards for policy/regulation and operation across Greater Manchester, and work with Government to strengthen national legislation". Recent activity has seen the Mayor of Greater Manchester leading the Government response to the 'out of town' taxi issues.

Limit Policy

Oldham Council has chosen to utilize its power to limit hackney carriage vehicle numbers, and as far as we are aware has done so for as long as such policies have been possible.

Taxi Statistics

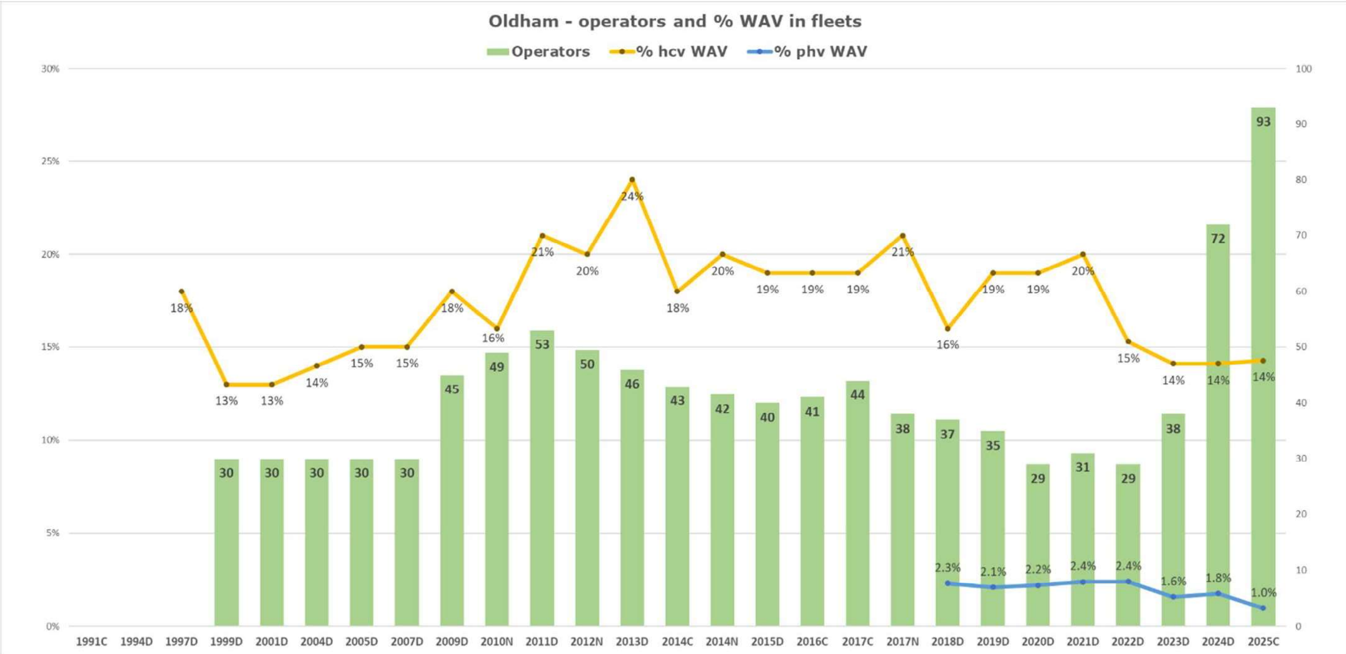
By drawing together published statistics from both the Department for Transport (D) and the National Private Hire Association (N), supplemented by private information from the licensing authority records (C), recent trends in vehicle, driver and operator numbers can be observed. Due to the comparative size, the operator and WAV proportion figures are shown in the second picture.



Licensing Statistics from 1994 to date

The graph shows the almost constant level of hackney carriage vehicle numbers over the years. At the time of the survey, there was one plate not on issue. Private hire vehicle numbers reduced slightly during the pandemic but have most recently grown significantly. All drivers are now able to drive either hackney carriage or private hire vehicles, and their numbers have grown even more than the number of vehicles.

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

The number of operators has also increased with the growth of the overall numbers of vehicles.

The level of WAV style vehicles generally grew from 1999 to 2013, to a peak of just under a quarter of the fleet. The proportion has since fallen with the level now having been stable at around 14% for the last three years, but much lower than at the time of the last survey. There are a small number of WAV in the private hire vehicle fleet, with a peak of 2.4%; but this proportion has fallen as the fleet has grown and is now just 1% (but of a much larger total vehicle fleet).

History of demand surveys in Oldham

A survey was under way in early 2020 at the point that the country was locked down. Only the driver survey had been completed at that time, although preparations had been made for the rank work. Following recovery from the pandemic, no further action was taken given the potential changes arising from the harmonisation of conditions across Greater Manchester City Region licensing authorities, which in the end did not occur. Consideration was also being given to removing the limit, but a decision was made to continue with this early in 2025, resulting in this Study.

3 Patent demand measurement (rank surveys)

As already recorded in Chapter 2, control of provision of on-street ranks in the Oldham Council area is fully within the functions of the Council, albeit within a different section. Our methodology involves a current review both in advance of submitting our proposal to undertake this unmet demand survey 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).

Rank changes

There has been significant change to rank provision and layouts since the last survey in 2017, although many of the changes were pre-pandemic. The Old Town Hall rank was revised so that all vehicles approach the rank from Greaves Street, where there is a long feeder rank, although this allows loading between 05:00 and 10:00 and is only a formal rank from 10:00 until 05:00. Initial issues with the rank design saw changes enabling vehicles to exit the rank if early vehicles became disabled.

A rank was added in Waterloo Street (22:00 to 05:00) outside the exit of the night club there.

A rank was provided at the Mumps Metrolink stop within the bus stop layout there.

The bus station rank was not in use during this survey – the loop road being closed due to work in the area – although vehicles were allowed to reverse into a part of the loop adjacent to the Tommyfield rank. In the past, vehicles would wait at the bus stop rank and then feed across to the Tommyfield rank. In the present situation, most vehicles went first to the stub of the bus station rank and then moved to the Tommyfield rank rear when space was available.

In 2020, and with this survey, observations were undertaken of the rank located in Uppermill.

Both Care Centre and Post Office ranks in central Oldham no longer exist.

The Royton rank remains near to the administrative block for the hackney carriage radio operation, but there is no passenger waiting facility there and all passengers must take vehicles from the rank, although some waiting vehicles might be dispatched from their to fulfil bookings, perhaps more so than at the other ranks.

Overview of rank observations

The 2025 survey provided some 8,328 lines of survey information for the rank survey undertaken from Thursday morning 3rd April 2025 through to later on Sunday 6th April 2025. Of these, 72% were vehicle arrivals or departures, 26% were records of pedestrian arrivals, 1.3% were 'general notes' and the final 0.7% were pedestrian walk-aways.

There were some 6018 vehicle arrivals or departures recorded (4715 over the Friday and Saturday observed in 2017). 80% (83%) of all vehicle movements observed were hackney carriages. 15% (8% 2017) were cars, 4% (8%) private hire and 0.5% each goods (1% in 2017) or emergency vehicles.

Overall rank usage estimates

Rank	2025		2017		2014		2011	
	Pass	%	Pass	%	Pass	%	Pass	%
Tommyfield	1,796	41	2,588	28	2,178	27	2,704	28
Bus Station	See above		1,280	14	1,313	17	1,632	17
Old Town Hall	1,225	28	2,794	30	3,129	39	3,754	39
St Mary's Way, night	Unused		1,077	12	518	7	1,064	11
Royton, Spring Garden St	1,196	27	751	8	528	7	410	4
Waterloo St, night	186	4	556	6	Not introduced			
Mumps Metrolink	Unused		122	1	195	2	Not introduced	
Royton, Oddies, night	Club Gone		97	1	60	1	Not introduced	
Care Centre	Gone		n/a		20	0.	Not introduced	
TOTALS	4,403		9,265		7,940		9,564	
From 2017	-52%		n/a		n/a		n/a	
From 2014	-45%		+17%		n/a		n/a	
From 2011	-54%		-3%		-17%		n/a	

The total estimated typical weekly passengers for 2025 are 4,403. This is a 52% reduction on 2017 levels, and 54% on the highest level recorded in 2011. The recovery between 2014 and 2017 has clearly been reversed. Levels during the pandemic recovery must have been even lower.

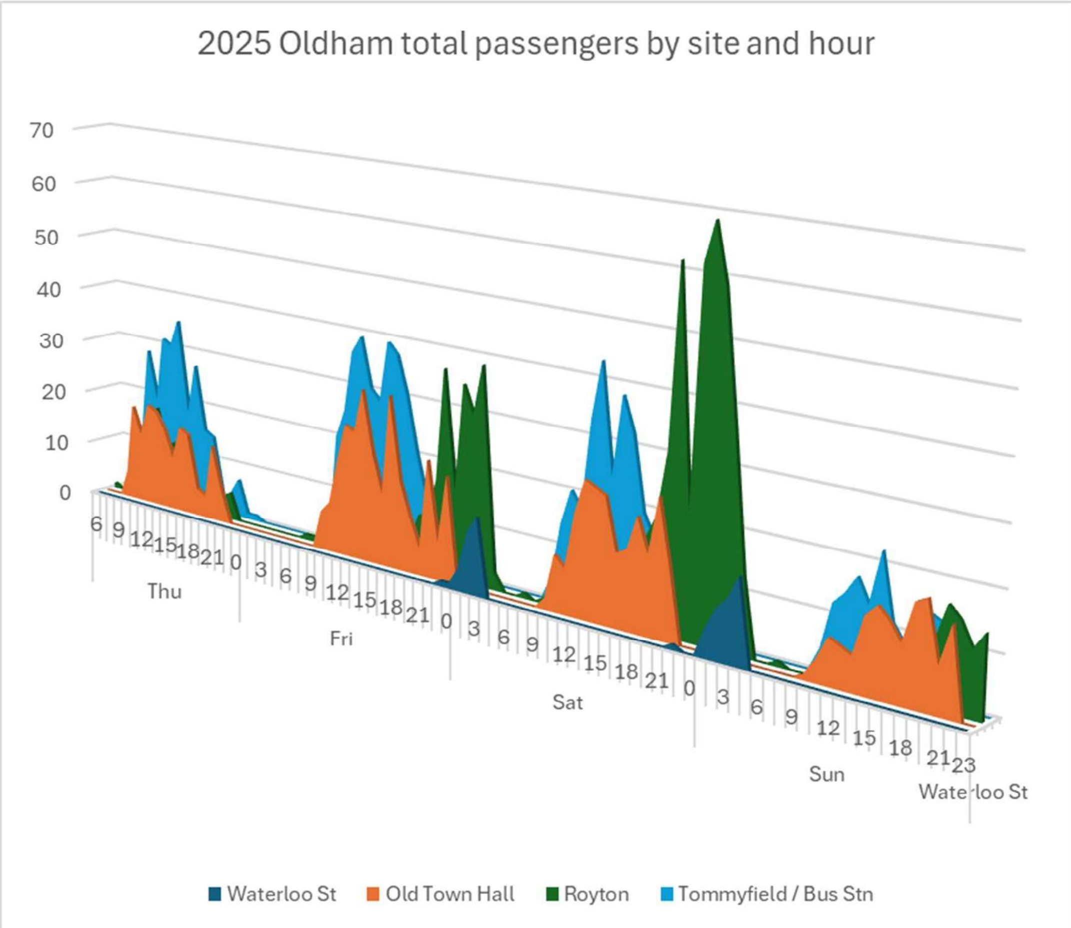
Busiest rank is that at Tommyfield, followed by Old Town Hall, closely followed by Royton with Waterloo Street seeing the least usage. The share between Tommyfield / Bus Station and Old Town Hall remains remarkably similar, suggesting the former bus station patronage has transferred to the Tommyfield location (although these observations do include any passenger boarding at the stub end). Royton has actually increased both volume and share. This remains effectively a hackney carriage booking office administrative site that is a rank, with no change from previous years. Passenger levels at Royton are not much less than those at the Old Town Hall location.

The level of hackney carriage usage from the Waterloo Street rank now seems to be such that there is no need for the St Mary's Way location, although it was observed that when peak vehicle flows occurred, some did wait here. At other times vehicles waited on Yorkshire Street to enter Waterloo Street, with some passengers taking vehicles from there.

One incident was noted where vehicles could not use Waterloo Street due to a police incident at the Club, in which case any passengers used Yorkshire Street.

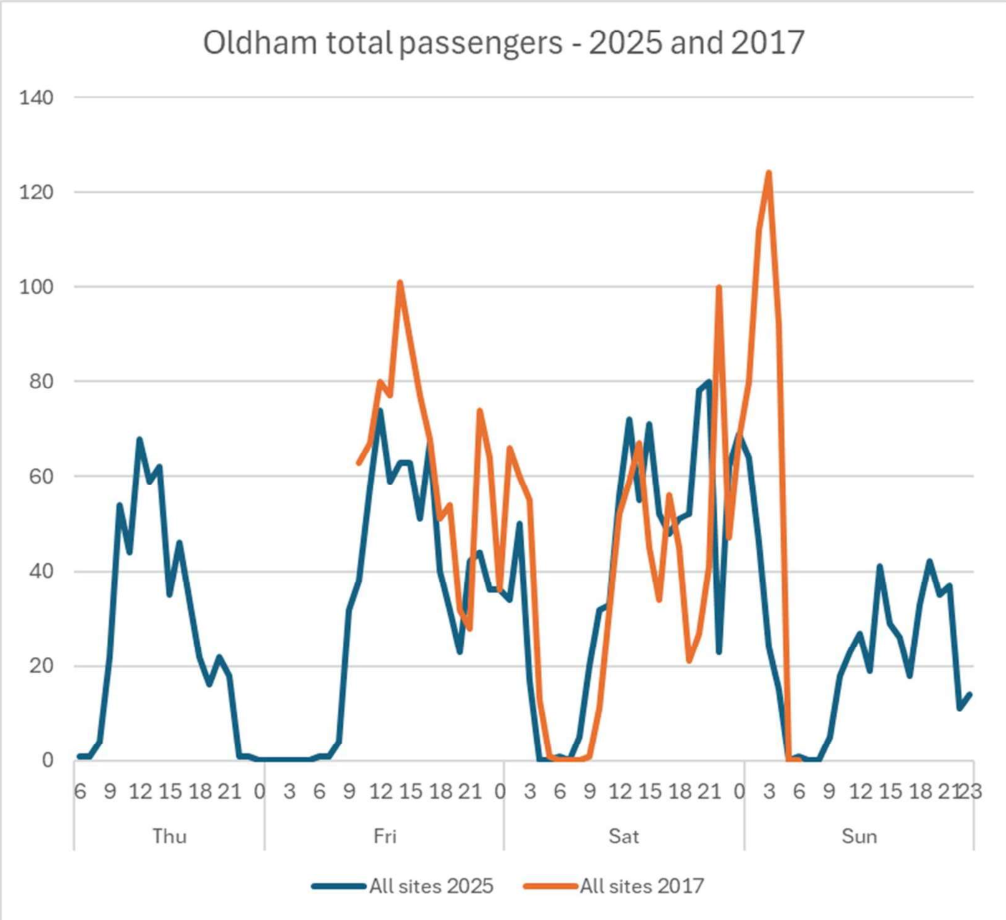
Rank usage by location and time

The graph below shows passenger flows by site and hour for the active ranks in Oldham in 2025:



Friday and Saturday flows are very similar apart from Friday night also having demand. Saturday daytime flows are not much different to Friday but there is a sharper overnight peak, mainly in Royton, but with later activity at Waterloo Street. Sunday flows are not a great amount less than those for Thursday, apart again from night demand, again appearing to be more in Royton. The Old Town Hall rank seems to operate more consistently for longer hours.

Total flows at all ranks are shown below, and compared to 2017:



The profiles of overall demand on the two days covered in both surveys, Friday and Saturday are relatively similar, albeit 2025 is at a generally lower level. Saturday flows were in several cases actually higher in 2025, but the high overnight flows in 2017 no longer occur.

Comparing average daily flows, 2025 Thursday is 21 passengers per hour; Friday is 36 (58 in 2017), Saturday is 42 (2017 46, much closer), and Sunday 21 – the same as Thursday (though over less hours). The peak flows in 2017 were in the early hours of Sunday morning, being 124 and 112 in the 03:00 and 02:00 hours respectively. There were just two other flows of over 100 passengers in 2017. In 2025, the peak flow was 80, at 21:00 on the Saturday night, followed by 78 the hour before. There were no flows more than 80 passengers over the four days.

The peak to average flow ratio, however, was 2.61 in 2025 but lower at 2.46 in 2017.

Surveyed hours with observed unmet demand

The rank observations identify the locations and hours when unmet demand occurs, i.e. people arrive, find no vehicle available and have to wait for one to arrive. For any such hours, average passenger delay is calculated by dividing the total waiting time for those experiencing a wait by the total number of passengers in any hour.

For this study there are just 29 of the 229 hours observed when there are any passengers waiting. This is more than in 2017 when there were just 22 hours. 5% of these hours have average passenger delay a minute or more; 7% have average passenger delay less than a minute.

In passenger terms, 1.5% of all passengers experience a wait when average passenger waiting is over a minute, and 0.9% when under a minute. Ten people experienced waits of 11 minutes or more, 12 between six and ten minutes and 46 between one and five minutes.

The longest average wait was 8 minutes 55 seconds, followed by 5 minutes 35, 4 minutes 41 and 4 minutes 21.

Sorted by day and time, the 2025 data hours with delay see 8 hours Thursday daytime, one Thursday evening, 8 Friday daytime and three early Saturday morning, five Saturday daytime, and two overnight Saturday/Sunday plus three on Sundays. This is a widespread level of delay despite low overall passenger numbers.

When considered by location, 82% of delay time was at the Spring Garden Street rank, 16% at the Old Town Hall and 2% at Tommyfield.

All these suggest low levels of passenger waiting. Further discussion in terms of how significant this is in respect to Section 16 of the 1985 Transport Act occurs in Chapter 7 below.

Persons walking away from ranks

During the course of the survey some 72 people were observed walking away from ranks without taking hackney carriages. It was not possible to surmise the actual reason for leaving. Royton saw 33 passengers, Old Town Hall 19, Tommyfield 14 and Waterloo Street six. These are not high numbers and many may be legitimate, e.g. people leaving friends who have taken hackney carriages, people who had not been waiting for hackney carriages, or various other reasons.

Frequency of vehicle operation during rank survey

The actual vehicles operating during the survey were noted in six sets of 1.5 hour samples, over the Thursday, Friday and Saturday of the survey. Over the three days, 936 different records were taken of vehicles operating at or near the ranks in the area. 79% of these were validated as local Oldham hackney carriage or private hire vehicles by using the local list of plates valid at the time of the survey. Of the Oldham vehicles, 40% were Oldham hackney carriages, 2% Oldham WAV style hackney carriages and the remainder Oldham private hire.

The 21% that were out of town vehicles came from eight different areas. 62% however were not possible to attribute to a particular authority. Five of the authorities were other Manchester authorities so could be legitimate journeys being made. The highest percentage, 16%, were from a distant authority known to be a key area used by licensees. The next largest percentage was from a neighbouring authority.

Of the hackney carriages, 58% appeared to be operating as individual vehicles. 22% operated for an operator for whom we also saw 11% of the private hire vehicles. Two other operators were identified from the hackney carriage operation who we also saw private hire operated by them – with 8% of the hackney carriage and 1% of private hire and 2% of the hackneys and 3% of the private hire respectively. 5% of the hackney carriages observed belonged to a company that only appeared to operate hackney carriages.

Just under 50% of the observed private hire vehicles that were confirmed as Oldham private hire were operating for a large international app-based company. Two other large local private hire companies provided 16% each of the observed vehicle observations.

Over the course of the plate observations, 77% of the local hackney carriage fleet were observed. In 2017, just the Friday was observed, but the level of activity from the fleet was remarkably similar at 76%. 38% were seen on the Thursday, 48% on the Friday and 63% on the Saturday. 29% of the hackney carriage fleet were observed only on one day; 26% on two days, and 23% on all three days.

One vehicle was observed 16 times; five were seen 12 times, three ten times; but with 11% of the observed vehicles just seen once, 7% five times and 6% twice.

The table below compares the proportion of the total hackney carriage fleet operating in the different observed periods and days:

	Late morning	Early afternoon	Late afternoon	Early evening	Late evening	Early hours (next day)
Thursday	18	11	6	5	1	4
Friday	14	19	4	6	5	23
Friday 2017	*33*	*25*	*12*	*19*	*29*	*33*
Saturday	24	25	10	11	15	26

The highest proportion of the hackney carriage fleet was observed in the early hours of Sunday morning (26%). 24% were seen late morning Saturday and 25% early afternoon. 23% were seen the early hours of Saturday morning. Lowest activity was late evening on Thursdays – just 1% of the fleet, followed by the early hours of Friday morning. The figures overall show a very active hackney carriage fleet, somewhat working to levels of demand.

Comparison to the 2017 Friday data however shows reduced levels of the fleet active in all time periods with the biggest reduction shown late evening on Fridays.

Other vehicles at or near ranks

Our observations noted all vehicles at or near ranks likely to impact on the activity of each rank. As noted above, 15% of all observations were private cars. All the observed usage of the rank at Uppermill were private cars. No hackney carriages were observed at all. The Mumps Metrolink stop saw 75% of its small number of observations being private cars (mainly people setting down or picking up passengers from the trams), with the remainder being service vehicles of Metrolink. 57% of vehicle activity at Waterloo Street was private cars with a further 21% of observed movements being private hire, and 19% hackney carriages. This location saw the worst of the mis-use of the rank.

The Old Town Hall rank saw 19% of the movements as private cars – almost exclusively in the feeder rank section. A further 5% were private hire and 1% goods vehicles. 75% were hackney carriages. The trade provided us many examples of how this impacted on their ability to keep the rank full of sufficient vehicles to meet demand.

The Tommyfield and Spring Garden locations only saw 3% and 1% cars, and no other real incursions. This relates to both being well-used by hackney carriages and laid out in a manner that it is much harder for other vehicles to use the rank spaces.

Observed usage for those with disabilities

Of the observed hackney carriages in the survey, 11% were considered to be wheelchair accessible vehicle (WAV) style. This is close to the 14% level within the fleet.

Seven passengers were observed using the ranks in wheel chairs. This was greater than the four observed in 2017. One was at Spring Garden (as in 2017) and the other six at Tommyfield (two in 2017). There was one wheel chair user observed at the Old Town Hall rank in 2017.

A further 98 (18) people were observed with other disabilities needing assistance. 56% of these were at Tommyfield, 24% at Old Town Hall and 19% at Spring Garden.

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 (e.g. of students, or a sub-centre), although conclusions from these separate samples can only be indicative taken alone. For some authorities with multiple centres this can imply value in using a higher sample size, such as 250 if there are two large and one moderate sized centre.

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 the 2025 survey, some 246 interviews were obtained, very close to the target set of 250. Of these, 47 (19%) were undertaken near the Co-op store in central Royton. The remainder were undertaken in locations in central Oldham including near the Nationwide bank, near Pepe's Takeway, near the Tommyfield pub, near Sainsbury's and near McDonalds. The additional surveys in Shaw, Uppermill and Lees were not undertaken this time.

They were undertaken on a Thursday (61%), Friday (19%) and Saturday (20%) towards the end of April 2025.

All those interviewed in Royton and 97% of those interviewed in Oldham said they were from the Oldham area. Of those not from Oldham, two were from parts of Manchester, one from Stockport, another from Calderbrook just over the boundary and two from Coventry.

The sample was compared to the latest projections available from the 2021 census, 2023 projections. 5% less males were interviewed than the census suggests (although this was opposite in Royton) whilst in terms of age, overall there were 8% less of the younger group, 2% less of the older group and 10% more of the mid-age group. The Royton sample was more extreme with 64% of its interviewees in the mid age group, and just 6% of the younger group compared to 49% and 19% respectively for Oldham.

In the three months before being interviewed, 76% overall (54% 2017)(81% in Royton and 75% in Oldham) said they had made one or more trips by any form of licensed vehicle in the Oldham area. By hackney carriage only was 5% (2% Royton, 6% Oldham); by private hire only 60%, 77% and 56%, and by both kinds of vehicle 11%, 2% and 13%.

With reference to frequency of usage, the most frequent level quoted was 40% of people saying they used both types of vehicle once or twice a week (26% Royton, 43% Oldham). 12% (similar in both areas) said they never used them. This results in an estimated 5.7 (2.3 2017) trips per person per month for the full area (5.2 Oldham and 7.8 Royton).

When compared to the similar question asked, but purely for hackney carriages, provides an estimated 12% of trips being made by hackney carriage. The value in Royton was just 2% whilst that in central Oldham was 16%.

People told us how they normally got a licensed vehicle in the Oldham area. 41% (57% 2017) telephoned (36% Royton and 41% Oldham), 31% used an app (not asked 2017)(45% and 28% in the area), 14% used a freephone (5% 2017) (11% and 15% in the areas), 12% (20% 2017) a rank (5% and 13%) and 3% (none 2017) hailed (2% and 3%). In 2017, 18% said they used their own mobile or phone. The value for use of a rank matches that from the overall level of usage estimates, also being fairly similar by area. The change from 2017 also suggests rank share has reduced.

People were asked which companies they used to book vehicles. 39% in Oldham and 32% in Royton provided an answer. In Oldham 56% (12% 2017) named three companies, 25% two (41%) and 19% (48%) just one. For Royton the values were 14%, 43% and 43% (a very different balance, suggesting possibly less choice and / or more satisfaction in Royton, although the overall numbers answering was lower).

Whilst there was no clear similar set of three chosen companies, for those choosing two companies one combination obtained 31% of all those quoting use of two companies.

Ten companies were named, a lot less than the 26 of 2017, although some of this was a reduction in the citing of different names for the same company.

In 2025, there were four companies quoted that people used with between 16% and 18% of share of those companies' people mentioned, totalling some 68% of the mentions (the top four in 2017 totalled just 57%).

The top company was only mentioned by those interviewed in Oldham, and has gained share since 2017. The next three companies were named by both sets of interviewees, with the dominant company in Royton (getting 42% of Royton responses) was also a company not named in 2017. The second company had lost share marginally whilst the fourth company had increased its share a little. Five other companies were first mentioned in 2025, with the other three companies named in both surveys losing share. Mention of an international app company had increased, now putting them sixth overall with 6% of mentions across the area (4% in Royton, 6% Oldham).

The top 'new' response was second equal in proportion of responses, another new entrant has 10% (fifth), two others were seventh and eight with 5% and 3% and the final two had 2% and 0.4% respectively. This suggests much greater competition now than in 2017.

In Royton just two apps were mentioned, an international and a local one. Ten were mentioned in Oldham. The top app gained 46% of mentions overall, with 73% of mentions in Royton and 40% in Oldham. The next three highest app mentions only scored 11% or 10%; with another scoring 8%, another 7%, one 4% and three just 1%; again suggesting plenty of choice for apps, though not necessarily in Royton (where just two were named, one of which was a new entrant, which may also explain the dominance there of the international app). The top nine named companies all were quoted as using apps with the top two quoted companies gaining the second and fourth highest quoted app mentions.

Hackney carriage usage per person per month was 0.8 for Oldham, 0.2 for Royton and 0.7 overall. Just one person, in Royton, could not remember seeing a hackney carriage in the area (was 3% in 2017, an improvement). 49% (75% in 2017) (53% Royton and 48% Oldham interviewees) could not remember the last time they used a hackney carriage in the area. This suggests good levels of knowledge about the differences between hackney carriages and private hire and good visibility of hackney carriages and improvement since 2017.

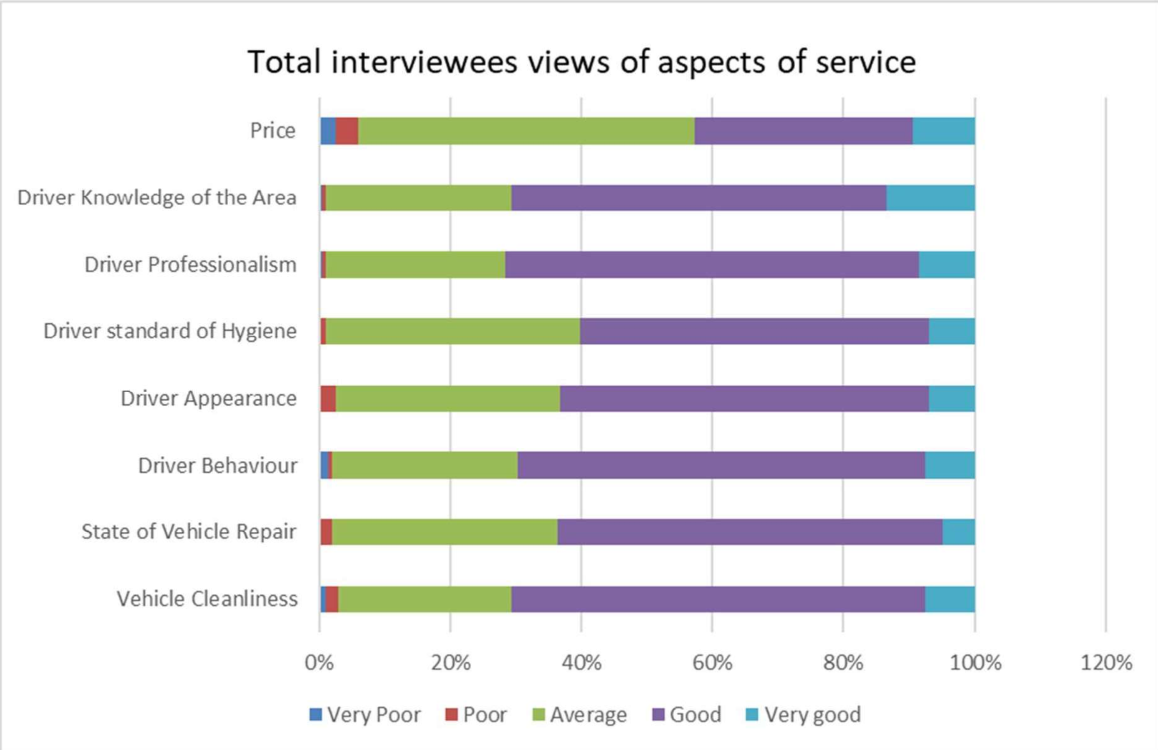
43% (64% in 2017) of interviewees told us ranks they were aware of and if they used them. In total just five locations were provided, compared to the 24 in 2017 (although many of those were colloquial versions).

5% of respondees in Oldham gave three rank names, 42% gave two (29% in Royton) and 53% just named one (71% Royton). The most frequent combination of two names given saw 55% naming the Old Town Hall and Tommyfield (although people called them Yorkshire Street and Henshaw Street respectively).

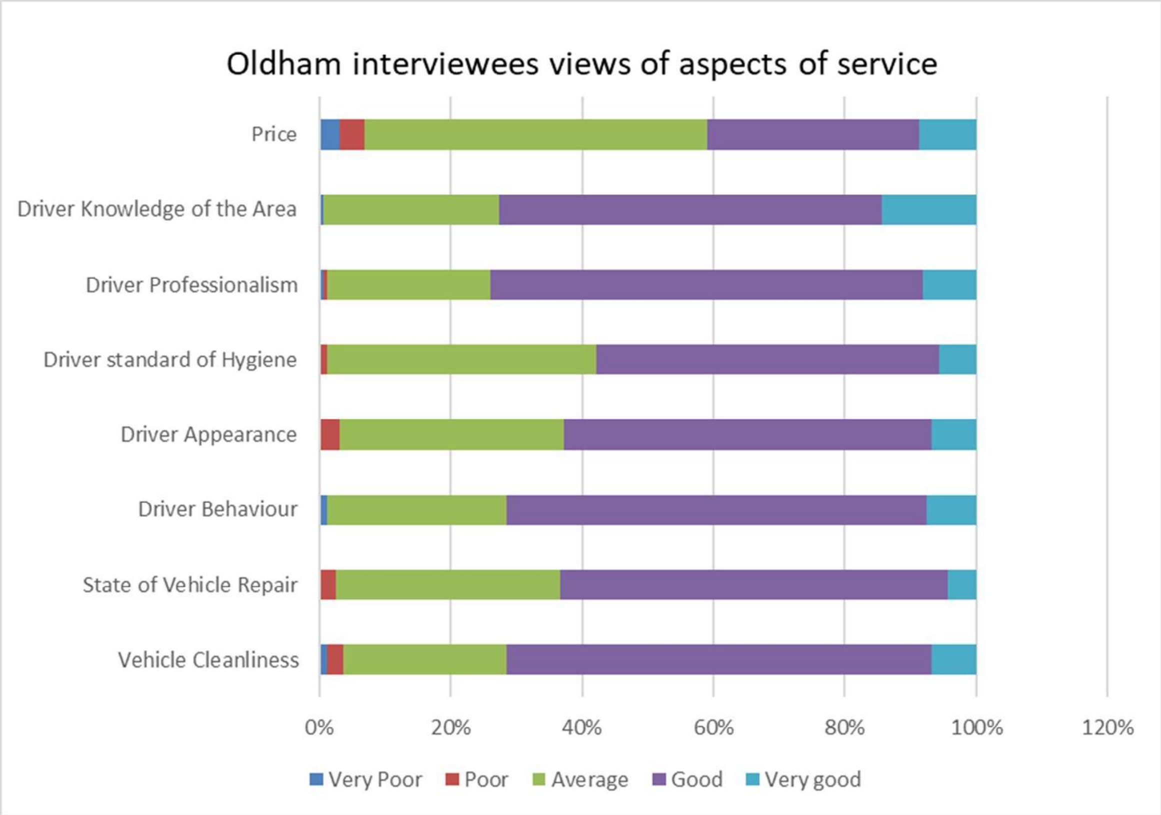
Old Town Hall obtained 52% (39% 2017) of mentions overall (33% Royton and 55% Oldham), Tommyfield (Henshaw Street) was second with 24% (17% 2017) (11% and 26%). Royton was third with 17% (56% and 5%), with some in the Oldham interviewees calling it Spring Garden Street. 5% in Oldham mentioned the Mumps rank. 3% (11% 2017) in Oldham mentioned the Bus Station rank.

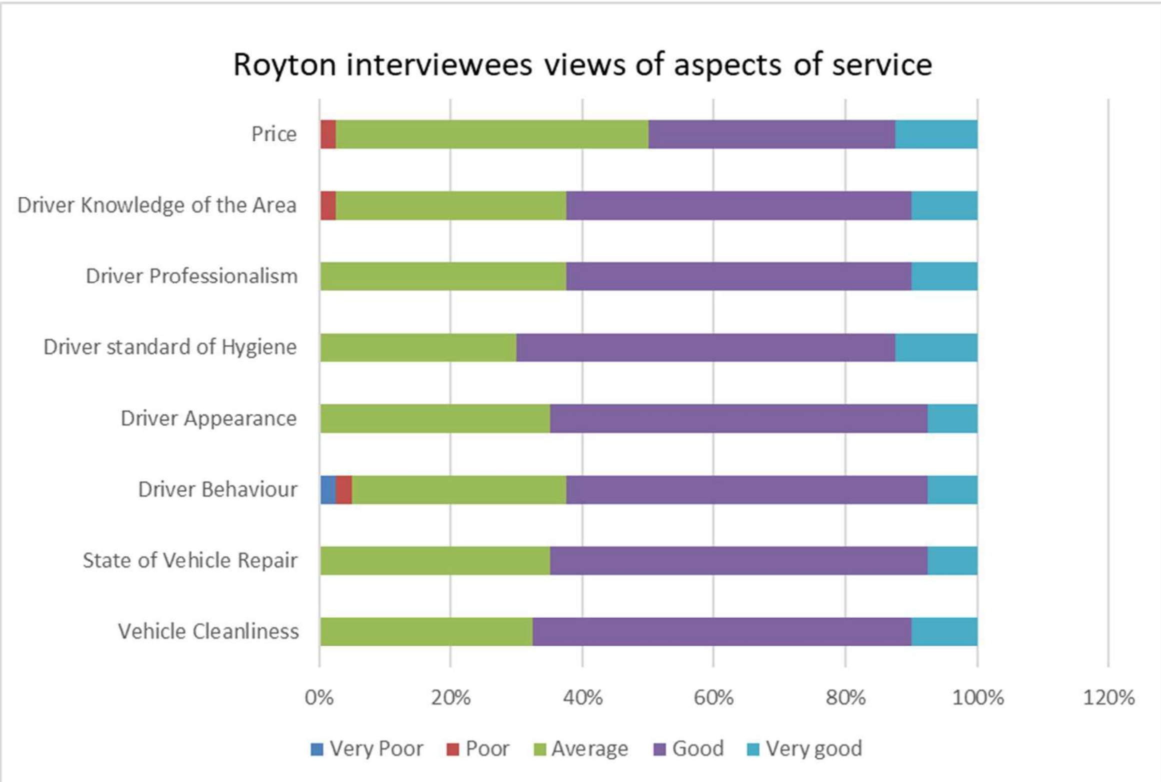
With respect to usage, 48% naming Old Town Hall said they used it, 47% for Royton, 46% for Tommyfield, 25% for the Bus Station and 14% for the Mumps rank.

81% overall told us for their recent trip how they rated various aspects. The results are shown graphically below:



The most dominant score for all aspects apart from price is 'good'. Highest scores were 63% for both vehicle cleanliness and driver professionalism. There were just five categories with 'very poor' scores, with the highest level being for price (but only 3%). The two area responses were relatively similar.


Oldham interviewees views of aspects of service
Price
Driver Knowledge of the Area
Driver Professionalism
Driver standard of Hygiene
Driver Appearance
Driver Behaviour
State of Vehicle Repair
Vehicle Cleanliness
0%
20%
40%
60%
80%
100%
120%
Very Poor
Poor
Average
Good
Very good


Royton interviewees views of aspects of service
Price
Driver Knowledge of the Area
Driver Professionalism
Driver standard of Hygiene
Driver Appearance
Driver Behaviour
State of Vehicle Repair
Vehicle Cleanliness
0%
20%
40%
60%
80%
100%
120%
Very Poor
Poor
Average
Good
Very good

LVSA

The only 'very poor' or 'poor' score in Royton was driver behaviour; otherwise there were no poor or very poor scores there. Price scored relatively better in Royton, otherwise most responses were similar to Oldham respondents.

With respect to aspects rated very poor the only additional information given was five people in Oldham saying 'expensive', one comment about an unhygienic vehicle, one about drivers and cars not being nice, and a final one 'some drivers are rude'. In context all these are insignificant.

More people – some 24 in total – took time to providing further detail for aspects they had rated 'very good'. The top was five saying 'great service'. Three people each said either 'very reliable' 'polite drivers' 'drivers know the area very well' or 'neat and clean'. Seven other single comments were provided – 'very helpful and polite' 'always on time' 'minibus service always professional' 'vehicles old but good' 'x is cheaper than others' 'very cheap' and 'y drivers are the best'. These are all encouraging and could be shared.

Overall, 80% of interviewees told us at least one matter that might make them use hackney carriages or use them more. 2% (all in Oldham) gave three reasons, two thirds gave two and the remaining 32% just one. As is normal across the country, 48% (41% 2017) overall said 'if they were more affordable'. Second with 30% was 'more hackney carriages I could phone for'. Better vehicle quality scored 9% (24% 2017), and driver quality 4% (24% 2017). More hackney carriages to hail or at a rank scored just 2%. 56% of those choosing two options stated 'if they were more affordable' and 'more hackney carriages I could phone for'. Five people added 'safety' and three 'quick availability'.

78% (96% 2017) of people said they did not consider they, or others they knew, needed an adapted licensed vehicle. Of the 22% saying they did; nearly all said someone they knew would need a WAV (16% of overall total). A small proportion (1% and 3% for others) said another kind of adapted vehicle, not a WAV. The change from 2017 suggests much higher need of WAV or adapted vehicles in 2025 than in 2017.

Just five people overall said they had given up waiting for a hackney carriage; three of these said at the Old Town Hall, two others did not say where. This suggests a latent demand factor of 1.02. This is the same as in 2017.

Response to walking away was that one made a booking, another used an international app, another walked, and another walked away but then hailed a vehicle.

93% (98% in Royton and 92% in Oldham) felt there were enough hackney carriages in the Oldham area.

None said they had ever had any issue getting a vehicle that matched their accessibility needs, with 3% (6% Royton, 2% Oldham respondents) said their needs were always met.

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 are very specific comments from given stakeholders, but we try to maintain their confidentiality as far as is possible. The comments provided in the remainder of this Chapter are the views of those consulted, and not that of the authors of this report.

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

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

Despite two attempts to contact various key stakeholders by email and a google form questionnaire, no responses were received. This is normal in the post-pandemic and not critical as stakeholder responses rarely provide much guidance in respect to unmet demand, unless there is a major issue.

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 behaviour.

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. However, it is also rare for there to be high levels of response, with 5% typically felt to be good and reasonable.

This survey was distributed to the trade as in all previous surveys. This report also records the 2020 trade survey which was completed but never reported as the main study was halted due the onset of the pandemic.

A total of 139 (47 in 2020 and 41 in 2017) responses were received. Once a small number of incomplete and some duplicates were removed, the total became 134. This is 4%, a fair total, but much more significant than that of previous surveys.

32% (98% in 2020) of these were from hackney carriage, with 9% (2%) that said they drove a private hire vehicle as well. 58% were from private hire and one from someone that said they did not drive any vehicle.

80% said the licensed vehicle trade was their only or main source of income. 5% were working part time but had no other source of income. 8% worked part time but had other sources of income. 6% said they were not currently working but planned to return once demand had increased, and 2% said they had left the trade with no intention to return.

On average, those responding had 10.5 (17 in 2020) years' service (16 in 2017). This ranged up to 38 (39) years. For hackney carriages, the average was 18.3 and maximum 35; for private hire 6.5 and 38, for those driving both vehicle types 6.7 and 26. This demonstrates the significant level of experience in the hackney carriage trade.

Drivers were asked the kind of work they normally undertook. Many gave multiple answers. 2% gave three answers, 27% two and the remainder just one answer. The responses were cross-checked with later answers and the vehicle type and several private hire responses that they undertook immediate hire – ranks were removed. However there were two private hire who both stated they undertook immediate hire from ranks and quoted in one case 5% of work from ranks, with the remaining from bookings and another 70% from apps and the balance of 30% from ranks. These have been left in but appear to be a possible issue. Both had relatively short periods of experience in the industry (one year and 2.5 years).

All those giving three answers said immediate hire work, ranks, immediate hire work, bookings and advanced hire work. Two only drove hackney carriage, one drove both kinds of vehicle.

The 27% providing two answers were broken down further as follows:

- 12% saying immediate hire work, bookings and advanced hire work
- 10% saying immediate hire work ranks and bookings (one of which was a dual vehicle user)
- Two (1.5%) as noted above that were private hire but also claimed ranks work as well as bookings
- Two (1.5%) that said immediate hire ranks and advanced hire – one a hackney carriage and the other a dual vehicle user
- Two (1.5%) advance hire work and chauffer / corporate (one dual vehicle and one private hire).

The remaining single answers comprised:

- 19% just immediate hire ranks (one of which was a dual vehicle user)
- A third just immediate hire work, bookings, all private hire
- 2.5% immediate hire work, bookings, dual vehicle users
- 2.5% immediate hire work, bookings, hackney carriage
- 12% advanced hire work only (one of which was a dual vehicle user)

- 3% chauffeur or corporate, one of which was a dual vehicle user.

When taken together, 26% overall said immediate hire, ranks; 49% was immediate hire, bookings, 22% advanced hire and 3% chauffeur or corporate.

48% (57% 2020 and 79% 2017) of those responding had worked six days in a typical week. 20% (26%, 18%) had worked five days and 15% (11%, 3%) seven. 6% (2%) had worked four days, 5% three, none (4%) two days, 1% a single day and 5% had not worked.

The average days worked were 4.4 (just under 6 2020). Hackney carriage average was 5.7 and the private hire 5.4. This amounted to, on average, 34 (43, 44) hours, with quoted hours ranging up to 90 (79, 60). Hackney carriage average was 38.8 hours and private hire 40.6.

In terms of periods worked within a week, the main difference was that 46% of hackney carriages said they worked the 13:00 to 20:00 period, with 10% 20:00 to 23:00 and 4% 23:00 to 05:00 whereas private hire saw 32% (less), 16% and 12% (both more); i.e. more private hire tended to work late and overnight. The share of morning service was very similar between the two kinds of vehicle, except that more private hire operated Sunday mornings.

Night service levels rise for both kinds of vehicles on Fridays and Saturdays but still see less levels of service than during daytime hours. Again, private hire levels appear to be higher than those for hackney carriage.

The largest quoted issue affecting when people worked remained, as in 2020 'family commitments' (35%, was 44%). 27% (21%) chose to work busy times. 20% (much higher than the 5% of 2021) chose to avoid times with busy traffic and 9% (8%) chose to avoid times when passengers might be disruptive. Just 1% this time (9% 2020) had the hours they worked affected by sharing of the vehicle they drove. The 'other' category was 9% this time, although some of those were specific quotes of the categories above.

81% (94% 2020, 95% 2017) owned their own vehicle. In 2020, 4% said they were under a lease or other financial agreement. A very small 3% (was 17% 2020 and 10% 2017) said someone else also drove the vehicle they used. Periods quoted were 33% (50%) at night, 33% evenings and 33% when other driver was not working (in 2020 remainder was 30% for days and 20% over weekends (very similar to 2017)

77% (much higher than the 47% of 2020) accepted pre-bookings. However, this was partly due to a much higher response this time from private hire. Of the 133 total responses, 2% gave three methods, 17% two, 50% just one, 7% said they did accept pre-bookings but did not say how, and 24% did not take pre-bookings. Only one named a company this time.

For the hackney carriage respondents, 53% said they did accept bookings, of which 61% were for a company (not named). 22% were for a company and app, 9% were return bookings, and 4% (each) were company and return booking and app. In 2020, the bulk of those accepting bookings were with one large hackney carriage radio operator (72%) with four other companies named, the largest being used by 11% and each of the rest by 6% each. This response was similar to 2017 although the level of accepting pre-bookings was actually reduced from the 64% in 2017 but increased from the 47% of 2020.

87% of private hire respondents said they did take pre-bookings. 55% did so via app; 20% by either company or app, 10% did not say how, 9% direct via a company, 3% through a company, an app or return bookings, and 1.5% each for app/return booking and app/own operators licence.

With reference to shares of work obtained, 26% of the hackney carriages obtained all their work from ranks. A further 11% obtained between 75% and 99% from ranks and the balance from hailing. 14% said they got half their work from ranks and half from bookings. A further 10% obtained between 20% and 80% from ranks with the balance from bookings. 2% got 90% from ranks with the balance from schools. Another 2% got 25% from rank and 75% from schools. 19% obtained between 10% and 50% from ranks, 25% to 60% from bookings and the balance from schools contracts. Four hackney carriage did not provide any details.

For private hire, 38% got all their work from bookings. 10% said they got all their work from a large international app, and 9% from an (unnamed) app. 29% provided no detail and the others obtained work from a range of other sources. As already noted, there were two private hire with only short lengths of experience saying they obtained work from ranks, and two mentioned work from hailing.

76% (compared to all in 2020) felt there were enough hackney carriages in Oldham now.

Many gave multiple answers for the ranks they used. The Town Hall rank was termed both Yorkshire Street (8%, 17% 2020) and Town Hall (15% (14% 2020), with 2% (as in 2020) saying Greaves Street, the feeder rank, giving a total of 25% (33% 2020) for this rank, making it the top quoted overall. The main rank quoted in its own right was Tommyfield 30% (28% 2020), then Royton 30% (25% 2020)(the rank near a booking office). None this time said Dan Fold (was 5% 2020 plus 1%, Bus Station) or St Mary's Way (was 4% 2020).

70% of those responding to the question felt that the number of hackney carriage vehicles should continue to be limited. In 2020 and 2017 this level was all those responding. When split by vehicle type, 91% of hackney carriages agreed, 49% of private hire and 50% of those saying they drove both kinds of vehicle also agreed, with 7% of hackney carriage, 42% of dual and 35% of private hire disagreeing. In each case the balance of 8%, 2% and 16% gave no response.

Whilst some (most in 2020) said how they thought this provided benefit to the public, most of the comments focussed on the excess numbers of vehicles. Those focussed on the benefits to the public stated experienced drivers, lower congestion and better service, with others pointing out more vehicles would lead to more congestion and lower remuneration for those working.

Most of the responses about how people felt removing the limit might benefit the public used the opportunity to reiterate they felt there were too many vehicles, or said simply that more vehicles was clearly a benefit to the public. The additional comments also focussed again on excess vehicle numbers.

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 (factoring high demand level impacts down) to 1.2 for January / February (inflating the values from low demand levels upwards).

There can be special cases where summer demand needs to be covered, 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 and needs to be taken fully in context.

Component	2025	2017	2014
Average passenger delay	0.13	0.1	0.015
% off peak hours with any delay	29.17	25	8.3
% passengers travelling in hours with over 1 minute average delay	3.81	2.03	2.3
Seasonality	1.0	1.0	1.0
Peakiness factor	0.5	0.5	1.0
Latent demand	1.02	1.02	1.005
Calculated index:	8.87	2.59	0.016

For 2025, all the main measures of unmet demand have increased, apart from seasonality, the peakiness factor and latent demand. The index of significance of unmet demand is now the highest it has been during the course of surveys undertaken, at just under 9. However, it remains a long way from the industry accepted level of 60 that would define the observed unmet demand as being significant in terms of the 1985 Transport Act Section 16.

This result implies that the limit can be retained and defended if necessary.

Further discussion of how this fits with the other evidence of this report occurs in the synthesis chapter below.

8 Summary, synthesis and study conclusions

This unmet demand survey on behalf of Oldham Council has been undertaken following the guidance of the BPG and other recent case history regarding unmet demand and its significance.

Background and context

This latest review of unmet demand and its significance is undertaken within the context of the Department for Transport November 2023 Best Practice Guidance, the latest provided enabling review if the current situation in Oldham supports application of section 16 of the 1985 Transport Act with respect to limiting hackney carriage vehicle numbers. This latest review for Oldham followed determination by the authority that a further survey was required given their view that the limit should be retained.

This survey was carried out between March and June 2025 with the rank surveys and public consultation on-street both in April, driver surveys through April and May and key stakeholder consultation through the full period. The area, which is a metropolitan borough authority within the Greater Manchester combined authority area, sets its own rank provision but sees overarching transport policy set at the combined authority level.

Local population in the area continues to grow. In 2021, travel to work by taxi was 1.9% for the authority compared to 1.2% for the north west region average and 0.7% for the English average level. Levels of disability from the 2021 census suggest higher levels than the English average at 8.6% compared to 7.3% for activities limited a lot, albeit lower than the North West value of 8.9%.

Transport policy was last set in 2022 in the "Oldham Transport Strategy and Delivery Plan" (OTSDP) and states that "taxis and phv's provide invaluable transport services at times when public transport is not an option".

The current Local Transport Plan for this area is based in the Transport for Greater Manchester (TfGM) five year Transport Delivery Plan and the Greater Manchester Transport Strategy 2040. Policy 1 states that the authority will work with partners to ensure (amongst others) that taxis and phv's are available and fully integrated into the Greater Manchester transport network.
Policy 28 seeks to work with the industry to develop minimum standards across the Region, with the Mayor of Greater Manchester taking the lead in potential Government response to out of town taxi issues.

The current limit on hackney carriage vehicle numbers appears to have been in place for as long as such policies have been possible, although the area did not draw any zoning policy through from the Government reorganisation of 1974 that saw many licensing authorities have such provisions (but more so in West Yorkshire than Greater Manchester).

The number of hackney carriages has remained at 85 since at least 1994 although one plate was not on issue at the time of the survey. After a slight dip due to the pandemic, private hire vehicle numbers have now increased significantly, as have driver numbers. Local policy sees all drivers now able to choose to drive either hackney carriage or private hire vehicles.

Oldham is one of the two Manchester area authorities that does not stipulate all hackney carriages should be WAV style. The level of these vehicles grew from 1999 to be 25% of the fleet in 2013. The level has now reduced to 14% although this level has been constant over the last few years. There are some WAV in the private hire fleet (2.4% at most, around 1% at present).

The number of operators has also increased significantly since the pandemic.

The limit has regularly been reviewed, although the previous survey was 2017 given that an update in 2020 was halted due to the onset of the pandemic. Prior to 2017, surveys were in 2014, 2011 and 2003.

Rank observations

Changes have been made to rank provision and layouts since the last survey in 2017, although all had been in place before the pandemic, so are not recent. The main change was to the Town Hall Rank which was provided with a feeder rank in Greaves Street (not available between 05:00 and 10:00 each day to allow loading), meaning the original layout was also changed so all vehicles need to approach along Greaves Street. A rank was added near the club in Waterloo Street operating 22:00 to 05:00. The Metrolink station at Mumps saw provision of a dedicated taxi rank.

In this survey, temporary road works closed the loop road on which the bus station rank was located. Vehicles were allowed to reverse into part of the remaining loop as part of their feeding to the Tommyfield Rank. The Care Centre and Post Office ranks no longer operate.

The 2025 survey recorded activity at all active ranks covering Thursday 3rd April through to later on Sunday 6th April 2025. Of all the survey information gathered, 72% covered vehicle arrivals and departures, 80% of which were hackney carriages. This was slightly reduced from the 83% observed in 2017, with the main increase being seen in private cars at ranks (8% 2017 to 15% now). This is a national change seen since the pandemic arising from vehicles finding spaces to park when hackney carriages were less active.

The estimated 2025 average weekly level of passengers is 4,403, some 53% lower than in 2017, and 54% lower than the previously highest recorded value in 2011. In terms of the levels of usage between sites, both Tommyfield and the Old Town Hall have very similar shares of usage. Spring Garden Street has actually increased actual and shares of patronage since 2017 whilst night demand at Waterloo Street has reduced in both actual numbers and share.

Busiest rank is Tommyfield (including any departures from the stunted bus station location), with 41% of estimated passengers. Next is the Old Town Hall with 28% and Royton with 27%. The remaining 4% were from the Waterloo Street night rank.

Thursday, Friday and Saturday flow profiles are generally similar apart from more significant night flows on Friday and Saturday into the early hours – mainly in Royton. Latest activity into the early hours of Saturday and Sunday is at Waterloo Street. In general the Old Town Hall rank operates more consistently for longer hours whilst the Tommyfield location tends to focus more on shopping hours.

When comparing total flows, profiles for 2017 and 2025 are similar with 2025 levels generally always lower although some Saturday daytime flows appear marginally higher. The sharp Saturday night peak is now much lower and much earlier. In 2017 four hours had flows over 100 passengers. In 2025 the peak is 80 and occurs at 21:00 Saturday compared to the peaks at 02:00 and 03:00 early Sunday morning in 2017.

Despite this, the peak to average flow ratio in 2025 at 2.61 is higher than the 2.46 of 2017. Per se this implies meeting demand in 2025 could actually be more difficult than in 2017 despite overall lower flows.

2017 saw 22 hours with passengers waiting, in 2025 this has risen to 29 hours. Further, hours with delay see more on Thursday daytime (eight) and Friday daytime (eight) than overnight Saturday / Sunday (two) when total passengers are actually higher. This is symptomatic of vehicles needing to find other work due to low overall flows. This is further discussed in the synthesis section.

Sample review of the activity of all licensed vehicles identified 21% of active licensed vehicles were out of town, with five other Manchester authorities represented but with the highest proportion of these plates being from an authority known to license many out of town plates (16% of the out of town plates). Of the 79% of plates validated as local, 40% were Oldham hackney carriages, 2% Oldham WAV hackney carriages and the remained, 48%, Oldham private hire.

58% of the hackney carriages appeared to be independents. 22% were working for an operator who also had private hire vehicles in their fleet. Two other 'mixed' hackney carriage / private hire fleet operators were also identified. A hackney carriage only operation accounted for 5% of the total hackney carriages observed.

Of the local private hire vehicles, half operated for one large app-based company with a further two sets of 16% each for local operators.

Over the three days 77% of the hackney carriage fleet were observed. In 2017 just one day was sampled, with the value of 76% resulting. In general, Saturday saw a higher proportion of hackney carriages active, with the highest proportion, 26% in the early hours of Sunday morning, followed by 25% early afternoon and 24% late morning. Comparing the Friday data from 2017 to 2025 however found generally lower levels of activity in 2025 on the Friday, with the strongest reduction being from 29% of the fleet seen late evening to just 5% for 2025.

With reference to issues with other vehicles using ranks, 57% of the activity at Waterloo Street was private cars, with a further 21% private hire and just 19% hackney carriages. In terms of daytime ranks, the Old Town Hall rank, and in particular its feeder, saw 19% of movements being private cars. The trade advised us that there were times when this meant it was hard to keep sufficient vehicles available to feed the main rank.

The level of observed WAV in the surveys at 11% was very similar to the 14% that exist in the fleet. The level of usage of these vehicles was up to seven people using wheelchairs compared to four in 2017. In 2025 most were at the Tommyfield rank. The level of people assisted into vehicles had also increased significantly (98 2025, 18 2017). Again a high proportion, 56% were at Tommyfield rank, with 24% at Old Town Hall and 19% at Spring Gardens.

On street public views

246 people were interviewed in the streets of Oldham including 19% in central Royton. Nearly all were from the area (97%). The sample structure was relatively similar to that in the 2021 census. 76% had made one or more trips by licensed vehicle in the area in the previous three months. However, hackney carriage saw just 5%, private hire 60% and by both kinds 11%.

The level of overall usage of licensed vehicles at 5.7 per person per month is much higher than the 2.3 estimated in 2017. When compared to hackney carriage usage, the estimate is 12% of trips being made by hackney carriage. This is lower than the 20% of 2017. However, since 2017 hailing levels have increased from 0% to 3%, but the main change is 18% saying they used their own mobiles or phones rising to 31% now saying they use apps. The freephone share has gone up from 5% to 14% but telephone is down from 57% to 41%. This follows the national trend towards increasing use of apps at the expense of more traditional methods of obtaining licensed vehicles.

The level of numbers of private hire companies named in 2025 at ten was a lot less than the 26 named in 2017, although a lot of this was reduction in use of alternative names for the same company in 2017. The top four names now take 68% of the total mentions whereas this was just 57% in 2017. The top company now gets 18% of share whereas it only had 1% in 2017; the second company was top in 2017 but now has slightly less share, the same level as another company not mentioned at all in 2017. The fourth company has slightly increased its share. This suggests a very competitive market, but one that is seeing agglomeration, another national trend. The top nine companies all saw people say they used their apps.

This has involved high levels of app activity although most of this was referenced in the central Oldham interviewees. However, the visibility of hackney carriages, very good in 2017 was excellent now, with just one person of the whole sample that responded to this question saying they could not remember seeing a hackney carriage. The level of those not remembering when they last used a hackney carriage had reduced from 75% to 49%.

However, a lower share of interviewees told us of ranks they were aware of and less locations were mentioned (partly due to a change in the method of questioning). The Old Town Hall rank saw 52% of total mentions with Tommyfield second with 24% and Royton third with 17%. Levels of quoted usage were near 50% for these three ranks.

In terms of scoring of aspects of service, 'good' was the most dominant score with highest 'good' scores for vehicle cleanliness and driver professionalism. Very few extra comments were provided for the very few 'very poor' scores, mainly related to expense.

In contrast, 24 people took time providing further detail for those aspects they had rated 'very good'. All are encouraging comments and should be publicised further.

48% said they would use hackney carriage vehicles more if they were more affordable. 30% said if there were more hackney carriages to phone for. Need of more at ranks scored just 2%.

The level of people saying they, or someone they knew, needed an adapted licensed vehicle increased from 2017 levels with most saying the need was for a WAV. None said they ever had any issue getting a vehicle that met their mobility needs.

93% felt there were enough hackney carriages in the area.

Key stakeholder views

As is becoming increasingly normal, no responses were received to the key stakeholder consultation. The only way such responses seem to be gained in the present climate is if this element is undertaken by already active council consultation departments.

Trade views

The only element of the 2020 survey completed was the driver survey, whose results were never reported. The 2025 survey received 134 completed and non-duplicate responses, about 4% of all drivers. 32% of these said they drove hackney carriages plus a further 9% saying they drove both hackney carriage and private hire. 80% said the licensed vehicle trade was their only or main source of income. 2% had left the trade and 6% planned to return when demand increased.

Though reduced, the level of experience in the trade remains high, although it is clear the bulk of new entrants have been in the private hire trade, with their average length of service 6.5 years compared to the 18.3 of the hackney carriage trade.

The relative inexperience in the private hire sector appears to include some ignorance of how they should obtain work with two saying they got 5% and 30% of their work from ranks despite clearly being private hire. There were a wide range of operating models which when taken together suggested 26% said immediate hire ranks, 49% immediate hire bookings, 22% advanced hire and 3% chauffeur or corporate (for the whole licensed vehicle industry).

The level of those working six days continued to reduce from 79% in 2017 to 57% 2020 and 48% now. However, more now worked seven days (3% 2017, 11% 2020 and 15% now). Average hours worked were now 34 (compared to 44 in 2017 and 43 in 2020). Responses suggested more private hire now worked late and overnight than hackney carriage.

Working around family commitments remained the main reason for when people worked, although this was reduced from the 44% of 2020 to 35% now. More chose to work busy times (27% compared to 21%) and a strikingly increased 20% (was 5%) chose to avoid times with busy traffic. The level of avoidance of disruptive passenger times was very similar.

A reduced level owned their own vehicles, though this might relate to the higher level of private hire input. The level of acceptance of pre-bookings was up to 77% from 47%, again partly due to private hire input. 53% of hackney carriage respondents said they did accept bookings – more than in 2020 but still less than the 64% of 2017.

26% of hackney carriages said they obtained all their work from ranks, with a further 11% obtaining between 75% and 99% from ranks and the balance from hailing. 14% said half from ranks and half from bookings. 23% of hackney carriages now said they had school contracts, one of which obtained 75% of their work from school contracts and just 25% from ranks.

38% of private hire got all their work from bookings with 10% saying they got all their work from a large app and 9% from another app.

76% felt there were enough hackney carriages in Oldham now – in 2020 all the hackney carriage respondents (there were no private hire) felt there were enough hackney carriages.

Top quoted rank was Tommyfield with 30% (28% 2020), with the Old Town Hall, although it was quoted by several names, with 25% overall (was 33% in 2021).

91% of hackney carriage respondents and 49% of private hire agreed the number of vehicles should continue to be limited. With hackney carriage only response in 2020 and 2017 this level had been 100%; the average was now 70% but with the private hire response now included.

Most of comments about benefits of the limit being retained now related more to the excess numbers of vehicles, this was also true of the section asking for benefits of removing the limit. Specific benefits quoted were experienced drivers, reduced congestion and better service.

Formal evaluation of significance of unmet demand

In 2025, all the main measures of unmet demand have increased apart from seasonality, the peakiness factor and latent demand (all of which remained the same). The index of significance of unmet demand is now the highest it has been in the last three surveys (8.87) but remains a long way from the industry accepted level of 60 that would suggest the unmet demand was significant.

Synthesis

Overall transport policy in the wider region supports licensed vehicles being available and integrated into the transport network. The local mayor is at the forefront of seeking to overcome the problems arising from the issue of out-of-town licensed vehicles and drivers.

There is evidence that overall use of licensed vehicles has increased, but much of the growth has been taken by large and or new companies, mostly through use of apps, whose usage is now nearly a third of quoted overall methods of getting licensed vehicles in the area. Estimated rank passenger numbers are 53% of what they were in 2017, with the main reduction being related to reduced levels of night travel from ranks. Shopping trips appear to be the mainstay of rank-based demand, with the Tommyfield rank being the busiest overall despite mainly operating in shopping hours.

The overall profile of demand on Thursdays, Fridays and Saturdays is now very similar, and the general profile over Friday and Saturday is remarkably similar to 2017 albeit generally at a lower level. However, there were some hours on Saturdays when 2025 flows were higher than 2017.

The reduced flow levels are evidenced by 2017 having four hours when there were a total of over 100 passengers travelling from ranks. In 2025 the peak flow is 80, and this also occurs at 21:00 Saturday compared to the peaks of 02:00 and 03:00 in 2017 in the early hours of Sunday morning.

Overall, even with lower passenger numbers, delays to the public and the overall performance statistics for the hackney carriage operation have worsened since 2017. Much of this appears to be at the Spring Garden Street rank although there was some passenger delay Friday lunchtime, in the peak Friday hour of 23:00 and on Sunday evening at the Old Town Hall rank, and in two hours on Sunday mornings at Tommyfield. The marginal worsening of the peak to average ratio also helps to explain the worsening of service levels.

There are a high level of out-of-town licensed vehicles active (21% of the sampled licensed vehicles seen). 16% of these were found to be from one large out-of-town licensing authority. Apps are strongly preferred by customers – nearly a third of their quoted ways of getting licensed vehicles. These factors explain how overall demand for licensed vehicles appears to have increases whilst rank usage has reduced, a national trend. This has led to more hackney carriages obtaining school contracts and more finding work from booking circuits, although the level of mixed fleets in Oldham (ones with both hackney carriage and private hire operating) has always been high. It is accepted this is a way people say they would use hackney carriages more, were more available by phone, but that does draw away from service to ranks (and this can be seen in the ISUD statistics which have worsened since 2017).

It also appears that, again with national trends, hackney carriages are better able to obtain sufficient remuneration to enable them to choose not to work less preferable times. Unusually compared to national trends, for Oldham it appears that private hire have extended their operating hours to cover this change, although it may also be that more people are finding it possible to make app and other bookings more of the time due to the high level of competition forcing private hire to work longer hours. The public also seemed less aware of rank locations now than in 2017.

The picture with reference to disability service is encouraging, with more people observed using wheelchairs to travel from ranks in 2025, and a significant growth in people being assisted into vehicles at ranks – mainly at Tommyfield. This matches the quoted increase in need for such vehicles and the observed level of WAV at ranks was very close to the actual level in the fleet.

The overall licensed vehicle service is felt to be 'good' and people took time to give encouraging comments which should be shared with the trade overall.

One concern arises that some of the more recent private hire entrants do not appear to be fully clear about how they can obtain work, or perhaps what terms to use for the work they obtain.

Strong support remained for retention of the limit, not just from hackney carriage but also from 49% of private hire respondents. A major concern raised was the high level of vehicles active in the area – a concern not only to hackney carriage but also to private hire.

Conclusions

There are many encouraging signs from this latest collection of evidence about the Oldham licensed vehicle trade. Service to those needing adapted vehicles seems to have increased need but also has seen increased usage of vehicles at ranks. The overall service is counted to be 'good' with respondents taking time to provide compliments.

The limit policy remains supported by both hackney carriage and private hire alike. It is providing stability to the trade overall and therefore benefit to the public. Hackney carriage activity on phone booking and app booking circuits is a positive move albeit appearing to have some negative impact on rank service (although the bulk of this is at Royton rather than in Oldham).

Strong competition and move to use of modern methods of getting licensed vehicles does appear to have increased the overall level of licensed vehicle usage with the national trend of reducing rank usage being seen markedly here. Some hackney carriages have taken advantage of reacting to this change positively.

There is concern that recent private hire entrants at best are confused about how they can legitimately obtain fares or at worst are taking advantage of apps to believe they can pick up people as if at ranks. This may need education of the trade and public.

9 Recommendations

On the basis of the evidence gathered in this unmet demand survey for Oldham, 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 Oldham licensing area. The committee is therefore able if it so wishes to retain the limit, and at its current level.

The marginal increase in the ISUD value suggests that the spare plate should be offered and kept available in case someone might wish to use this to help improve service to ranks, although such usage cannot be stipulated with its issue.

Consideration is needed to improve the enforcement of feeder ranks – some authorities use technology to do this more effectively.

Public and trade education is needed to explain and confirm the modern ways that people can get licensed vehicles, and the ways that are not legal or safe (e.g. do not take private hire from ranks, focus on using apps which tell you high levels of detail about the vehicle and driver that will service your request). This could be fed back to the team working with the Region Mayor to improve overall understanding of how licensed vehicles should operate.

Strong benefit would be gained from publicising the good views held by customers of the overall service provided, and the good service provided in the area to those needing adapted vehicles, particularly WAV style.