

Transport for Greater Manchester

Greater Manchester Taxi Review

High Level Findings Report – Final

Reference:

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This report takes into account the particular instructions and requirements of our client. It is not intended for and should not be relied upon by any third party and no responsibility is undertaken to any third party.

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1. High level findings

1.1 Background

In April 2025, Transport for Greater Manchester (TfGM), on behalf of the ten Greater Manchester (GM) Authorities, appointed Arup / AECOM to undertake a high-level review to establish how GM can realise its vision for taxis, as set out in the Greater Manchester Transport Strategy 2040.^{1 2}

The GM Transport Strategy 2040 contains two policies directly related to taxis:

Policy 1: The development of new demand responsive technologies and applications will make it easier for people to plan, book and pay for journeys, potentially as part of longer multi-modal trips. We will continue to work with commercial and community transport operators to ensure that these supporting modes of transport are fully embedded into our Transport Strategy and are seen as an integral part of a fully integrated, accessible transport system in Greater Manchester.

Policy 28: Our long-term aim is to achieve more consistency across the conurbation, in order to provide a better, more integrated service to the customer and to ensure that taxis entering the Regional Centre and main town centres meet the highest environmental standards. We will work with the ten licensing authorities and the taxi/private hire industry to develop more consistent standards, building on best practice from elsewhere in terms of policy/regulation and operation. There will however be a need to ensure that higher standards are not undermined by vehicles registered in neighbouring authorities operating in Greater Manchester.

The aim of this review is to develop the evidence base to allow informed and evidence-based decisions to be made regarding:

- How authorities can further improve the consistency of standards for hackney carriages (Hackneys) and private hire vehicles (PHVs) across Greater Manchester (GM).
- How to establish the ways that drivers, vehicle owners, and operators can be encouraged to obtain licences with one of the ten GM local authorities.

According to analysis from the government's Joint Air Quality Unit, who have integrated DVLA and DfT records to help GM better understand the taxi fleet operating within the city-region, it is estimated that 49% of private hire vehicles operating in GM are licensed out of area (OOA). This means that around 12,000 PHVs operating in GM are licensed outside of GM (Hackney Carriage vehicles must generally operate where they are licensed).

The change in OOA has coincided with legislative change that has enabled private hire operators to expand their geographical reach with the advent of 'sub-contracting' and the evolution of national operators. There are potential impacts to the trade from app-based operators taking advantage of the ability for drivers to operate OOA. This new "gig economy" increases the supply of drivers and vehicles in GM to serve demand for journeys

¹ [Greater Manchester Transport Strategy 2040](#)

² The Transport Strategy is currently being updated

from passengers, which is evolving due to societal changes such as increased smartphone use, driving down the price of journeys, negatively affecting the ability of GM licensees to earn a living. OOA also means that GM local authorities have less control and knowledge of private hire drivers and vehicles working in GM.

Between May and June 2025, Arup / AECOM carried out an extensive engagement exercise with those involved in the taxi industry to understand the issues relating to taxi licensing in detail. The engagement comprised a survey for licensees, which received 5,241³ responses (c28% of GM licensees responded), interviews with members and officers responsible for taxi licensing in all 10 GM local authorities, interviews with local authority officers responsible for taxi licensing from five authorities outside GM: Leeds City Council (Leeds), Liverpool City Council (Liverpool), Sefton Metropolitan Borough Council (Sefton), City of Wolverhampton Council (Wolverhampton) and Transport for London (TfL), and seven focus groups across the taxi industry. This was complemented by a detailed benchmarking exercise, which considered licensing standards, fees and processes.

For the purposes of the review, the term "taxi" is used generically to refer to both Hackneys and PHVs, except where specific distinctions are identified. While Hackneys and PHVs each have unique licensing criteria and operational rules—such as the ability of Hackneys to be hailed at a rank or on the street, and the requirement for PHVs to be pre-booked—the broader term "taxi" encompasses both groups when discussing overarching policies, customer experience, and integrated transport strategies for Greater Manchester.

This approach aligns with the strategic aim of treating all licensed vehicles for hire as integral elements of the region's transport system, while recognising operational and regulatory nuances where necessary. The Greater Manchester Travel Diary Surveys (TRADS) show that, in 2024, GM residents made c.120,000 trips per day by taxi, c.44m each year.

1.2 Key Findings

- 1. Most GM PHV licensees state that they chose to license in Greater Manchester because it is where they live (74%) and want to work (66%).**
- 2. Non-GM PHV licensees state that they had obtained their licences from authorities elsewhere because:**
 - a. It was faster to get a licence (54%)

The GM local authorities do not publish processing times for licences on their websites whereas some non-GM local authorities clearly display which applications they are currently processing based on what day they were submitted.

In this study, none of the authorities benchmarked were requested to supply data regarding licence processing times, so quantitative comparisons were not possible.

³ 5,159 respondents were from private hire or Hackney licensees, with the remainder from Operators, other respondents who worked in the taxi trade or members of the public. There were 4,202 responses from GM licensees and 957 from those licensed outside GM.

Some GM licensing managers stated that they believe their typical processing times are similar to non-GM authorities, with other GM licensing managers acknowledging that they have had delays in processing in the past. They also noted that TfL⁴ and Wolverhampton⁵ have recently had major delays in processing applications. Trade perception differs with survey data identifying this was a factor for those applying outside GM based on their most recent application. GM licensing managers highlighted that processing times are influenced by the necessary steps involved, such as driver proficiency tests and knowledge tests, as well as the standards set by the administering authority, including the level of document verification. Variations in requirements and application scrutiny can result in differences in the speed of processing across authorities.

This presents an opportunity for GM authorities to address perceptions regarding processing times in the trade. It is recommended that GM local authorities communicate their processing timelines clearly and continue to seek ways to streamline procedures and processes.

b. It was cheaper (51%)

Benchmarking was undertaken on the fees quoted on local authority web sites. A key finding is that local authority fees are structured differently in each authority making it difficult to compare like with like. Fees were therefore benchmarked using three hypothetical licensees with different circumstances. The hypothetical scenarios modelled were:

- Scenario A: A new driver's licence application with a new Hackney/PHV
- Scenario B: A renewal driver's licence application with a three-year-old Hackney/PHV
- Scenario C: A new driver's licence application with a five-year-old Hackney/PHV

Midway through the study, Wolverhampton announced that they planned to increase their licence fees. Therefore, we have benchmarked using the old fees (the fees in place when the survey was undertaken) and the new fees (which represent what the future will look like for licensees). Our study found that:

- There was significant variation in all fees within the 10 GM local authorities. The difference between the highest and lowest GM local authority fee ranged between £300 - £450 (circa 33-53%) depending on the scenario.
- When compared against Wolverhampton's old fees, which were in place when a high proportion of licensees in England switched to Wolverhampton, Wolverhampton are cheaper than all GM local authorities across all scenarios, ranging from £40 - £500 cheaper depending on the scenario and the GM local authorities compared against.
- When compared against Wolverhampton's new fees, some GM local authorities offered similar or cheaper fees than Wolverhampton, depending on the scenario.
- GM local authorities typically require mid-year tests for older vehicles, which creates a meaningful difference between the vehicle related fees charged by Wolverhampton and vehicle fees charged by GM local authorities. Based on the benchmarking in

⁴ [Uber drivers left unable to work due to TfL licensing delays - BBC News](#)

⁵ [Wolverhampton's slow licence renewals 'left cabbie unable to work' - BBC News](#)

scenario B⁶, an additional vehicle test costs between £40 and £66 depending on the GM local authority.

- Renewing with the same local authority is typically cheaper than applying for a new licence with a different local authority. This means that, if a licensee is already licensed with a non-GM local authority, it will be more expensive for them to switch to a GM local authority when their licence expires. Based on the benchmarking in scenario B, a PHV driver renewing with Wolverhampton using a three-year-old vehicle would expect to pay £382.85. If they were to subsequently return to the cheapest GM local authority based on the benchmarking in scenario C they would expect to pay £564.50, a difference of £181.65 (for Hackneys the figures are £382.85 for Wolverhampton and £573.50 for the cheapest GM local authority, a difference of £190.65).

The survey data outlined that 93% of non-GM licensees agreed that licence fees charged by their authority were reasonable, compared to 36% of GM PHV licensees who held the same belief. The benchmarking indicates that, at the time of the survey, Wolverhampton's fees were lower than those set by GM local authorities. However, going forward, Wolverhampton's fees may not always remain lower than those of GM local authorities. Therefore, there may be a difference between the trade's perceptions and the actual costs of licensing in the future if this is not clearly communicated. There is an opportunity for GM local authorities to clearly communicate their fee structures with the trade and highlight that it is now the case that some GM local authorities are priced competitively with Wolverhampton.

As outlined in best practice guidance *"It is essential to a well-functioning taxi and private hire vehicle sector that those administering and enforcing the regime are well-resourced. The licensing model is intended to be self-funding through licensing fees and it is expected that licensing authorities seek to provide a well-resourced system at the lowest cost to licensees. Licensing authorities should regularly review their fees to reflect changes to costs, both increases and reductions."*⁷

An authority with a larger number of licensees could be expected to create economies of scale, allowing administrative costs and service overheads to be spread across a large pool of licensees and reducing individual fees. In contrast, when the number of licensees declines, challenges arise due to the predominance of fixed overhead expenses, which are not readily reduced without impacting essential service delivery roles. Consequently, fee increases may be required to ensure budgetary balance, potentially affecting overall demand.

There was consensus from GM local authorities that, based on current operations, reducing fees further would require either increased scale or external subsidy, neither of which was considered feasible in the current economic climate. GM officers, however, agreed that there

⁶ Some GM local authorities clearly display the cost of an additional vehicle test as a single line item, others include this cost as part of one headline figure for a vehicle licence application. The range of £40 - £66 is based on the figures outlined as a separate line item on local authority websites.

⁷ [Taxi and private hire vehicle licensing best practice guidance for licensing authorities in England - GOV.UK](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/614421/taxi-and-private-hire-vehicle-licensing-best-practice-guidance-for-licensing-authorities-in-england.pdf)

are opportunities to consider greater collaboration, particularly around joint procurement, investment in automated systems, review processes and fee components.

c. Training and assistance provided to obtain the licence (36%)

The survey highlighted that non-GM licensees (92%) found it easy to apply for licences compared to GM PHV licensees (75%). The range for GM licensees was 57% to 88%, reflecting significant differences in the processes used by the 10 GM local authorities, some of which still have paper based or phone/email reliant processes. Trade focus groups highlighted a view that applications often ‘disappear into a black hole’, so improvements could be made to the visibility and communication of the application process.

d. Availability of vehicle test centres (29%)⁸

GM local authorities emphasised the importance of maintaining high testing standards for public safety, especially given the high mileage of licensed vehicles.

They recognised that using external garages may attract more licensees to license locally. However, to increase the availability of test centres without affecting standards would necessitate changes in staffing resources and technology for audit testing and secure integration with GM business networks to report testing outcomes directly, thereby preventing improper vehicle approvals.

Most GM local authorities require licensees to take their vehicle to a dedicated test centre and officers and members were generally in agreement about the value of conducting this process in-house. Liverpool and Sefton allow authorised local garages to undertake tests and Wolverhampton accept any MOT garage.

There is clearly a balance needed between offering choice and ensuring the tests provide the rigour expected by customers, with Wolverhampton’s position and GM local authorities with their own dedicated test centres at the extremities of this approach.

3. Vehicle and driver standards examined are broadly similar across all 15 local authorities benchmarked with the following differences:⁹

- a. For driver licences, most GM local authorities require a geographical driver test for PHV drivers whereas Wolverhampton does not require this. During focus groups, licensees stated that they feel geographical knowledge tests are not necessary because of GPS navigation.
- b. The main difference on vehicle standards appears to be sticker requirements, with some GM local authorities requiring door and bonnet stickers and others not.

⁸ The survey included a free text question asking how GM could encourage licensing. Many respondents suggested that changes to vehicle test frequency, strictness, and location would make them more likely to license with a GM authority.

⁹ The review did not cover how local authorities implement or enforce standards in practice, as this depends on their resources and interpretation of those standards.

Wolverhampton also allows written off (Category S) vehicles¹⁰ whereas half of the GM local authorities do not allow Category S vehicles.

Officers and members highlighted that the safety of passengers is a key consideration in justifying the additional requirements expected in GM but also emphasised that differences lie in the application and enforcement of those published standards.

Standards are however not identical across GM local authorities, and this is reflected in the variance in the proportion of GM PHV respondents who felt standards were too strict (34% to 66% for driver licences and 45% to 77% for vehicle licences). There were also more GM Hackney licensees (75%) who agreed that the vehicle standards were too strict, compared to GM PHV licensees (60%). The taxi trade highlighted the lack of trust in the licensing process and the expectation that standards would be changed. GM local authorities and Wolverhampton officers agreed that common standards would be useful but suggested that these should be set by government, as GM local authorities have not been able to reach a consensus regarding the detail of the standards and how they should be implemented. This approach could however mean that GM must wait for the government to implement national standards, with the potential for these to be lower than those currently set by some GM authorities.

It should be noted that national standards may not remove variation however, as due process, enforcement and decision making could still vary across the country. GM Officers recognised that the delays around emissions standards have led to uncertainty within the trade and that there are misconceptions around which standards are government-mandated and which are a matter of local discretion.

4. Enforcement rates examined are not significantly different between GM and non-GM authorities.

There is a perception amongst GM local authorities that enforcement is lower for out of area licensees and a key reason why licensees license outside of GM. Each local authority enforces licensing standards slightly differently, making comparisons difficult (for example Manchester City Council issue a suspension every time a vehicle fails an MOT). Taking these differences into account, GM and Wolverhampton enforcement rates for vehicle licence suspensions are similar and vehicle licence revocation rates are higher for Wolverhampton compared to GM. However, GM have much higher rates of driver licence enforcement compared with the figures provided by Wolverhampton.

Less rigorous enforcement was not stated as a main factor in licensees' decision making when licensing out of area (8th out of 14 with only 12% of non-GM licensees).

¹⁰ A Category S written off vehicle refers to a car or van that has been classified as "structurally damaged" after an accident or incident, according to insurance industry standards in the UK. The "S" in Category S stands for "Structural," indicating that the damage affects parts of the vehicle's structure, such as the chassis, crumple zones, or suspension mountings. Category S vehicles can be repaired and put back on the road, but the structural repairs must be properly carried out and certified as roadworthy before the car can be legally driven again.

A key issue in the enforcement process is the lack of reciprocal enforcement agreements between authorities, and GM local authorities have no visibility of any actions taken if they refer a complaint to another authority, which may contribute to this perception. Under the current framework of taxi licensing, it is not easy or practicable to implement reciprocal enforcement agreements either between GM local authorities or with non-GM authorities where there is a large disparity between the resources available to each authority, and the amount of licensees each authority has working OOA.

Enforcement is also not just about recordable case outcomes. For instance, if a licence is granted without adequate due process or rigorous quality checks, this would not appear in enforcement statistics; however, such an approach to compliance potentially affects the trade perception of the authority's commitment to robust enforcement. Likewise, instances where a driver does not receive a warning or their licence is not revoked following a significant complaint are also typically not documented in official enforcement outcomes.

During our engagement, one GM authority gave an example of a non-GM authority allowing a driver to surrender their licence following a sexual assault complaint. There was therefore no record of it on the NR3 (the National Register of Taxi Licence and Revocations) database, meaning that the licensee would be able to re-apply to any other authority, who would have no knowledge of this complaint. The GM authority is concerned whether or not this was an isolated incident and the resulting impact on public safety.

GM officers advised that past efforts to maintain a consistent convictions policy have diverged as authorities adapted to local needs, but a renewed focus on high-level alignment was seen as possible and that apparent differences in enforcement outcomes may reflect variations in process and record-keeping rather than actual enforcement rigour.

5. GM Members and Officers agree that legislative changes are needed at a national level to deal with out of area working.

The project has coincided with the Casey Audit and Government response on group-based child sexual exploitation, which identified that *'taxis have historically been identified as a way children can be at risk of sexual exploitation'* and recommended that *'the Department for Transport should close this loophole (allowing drivers to license anywhere in the country) immediately and introduce more rigorous standards'*. GM local authorities agreed that thought needs to be given to the unintended consequences of implementing such changes and the cost and practicalities of enforcement. GM has also launched the Backing our Taxi: Local Licensed Trusted campaign to support a new approach to address out of area licensing. If delays occur to government policy, Leeds have informal agreements with operators to employ West Yorkshire licensees only, which GM could consider establishing.

6. Opportunities exist for greater regional collaboration to strengthen the integrity of the licensing system in the city-region.

The English Devolution White Paper, published in December 2024, indicated that the government intends to initiate consultations regarding the potential transfer of taxi licensing responsibilities to Mayoral Combined Authorities (MCAs). This review sought feedback on the concept of regional licensing.

Regional licensing was more widely supported in the survey than not (52% and 26% respectively), with the remainder not holding a view either way. GM PHV licensees showed more support (61%) compared to GM Hackney licensees (30%). Disagreement was higher

among GM Hackney licensees, particularly those licensed with Manchester City Council (64%).

Hackney licensees raised concerns about the potential influx of Hackney vehicles into Manchester City Centre during peak times. PHV licensees saw potential benefits in regional licensing, such as improved efficiencies through centralised admin and reduced waiting times for applications and vehicle testing.

All respondents recognised the need for further consideration and information before fully assessing the impact of regional licensing. However, all saw the opportunity to improve the application process, achieving consistent driver and vehicle standards, whilst keeping local knowledge and relationships.

There was also support from GM local authorities to establish an industry working group to support alignment with the ambitions of the Bee Network.

7. Members are concerned about decreasing numbers of Wheelchair Accessible Vehicles (WAVs) and the potential effects of this reduction on transportation options for people with disabilities.

WAVs perform a key role in supporting disabled individuals to travel and fully participate in life across GM. According to TfGM, as of January 2025, most of the current GM Hackney fleet are WAV's (87%) whilst only 3% of the current GM PHV fleet are WAVs.

There are two observations:

1. WAV (Hackney) vehicles are more expensive than other vehicles.
2. Hackneys do not have the historical advantages they used to, therefore licensees have less incentive to purchase them. The lost advantages can be linked to changes in technology and society such as ride hailing apps making PHVs more readily available.

During our engagement, Members and Officers advised that the Hackney fleet is shrinking, and the typical age of vehicles and drivers is increasing. As most WAV vehicles are Hackneys, this raised concerns that passengers will struggle to access WAVs in the future and so reduce the ability of disabled people to travel around GM.

8. There are differences in perspective between local authorities and stakeholders in the trade, which present challenges for establishing a unified and effective licensing system.

During engagement with GM Licensing Officers and elected members:

- **Role of Licensing Authorities:** There was a shared view that the primary responsibility of officers and members is to uphold standards and ensure public safety. They are keen to attract licensees who wish to work in their local authority. It is not considered desirable to target licensees for the benefits of economies of scale, if those licensees then choose to work in other authorities.
- **Commitment to Public Safety:** Officers and members consistently emphasised that public safety, both in terms of drivers being safe to work with vulnerable passengers and vehicles being safe to operate on the road, is their top priority. Licensing standards as part of an effective licensing regime is seen as the way to ensure that only safe and competent drivers and vehicles operate in the region.

From the perspective of the Hackney and PHV trades:

- **Desire for Consistency:** The taxi trade expressed a clear need for greater consistency across licensing authorities, alongside a desire for a more trustworthy and transparent licensing system.
- **Concerns About Bureaucracy:** PHV operators highlighted the burden of what they perceive as excessive and inconsistent red tape, which varies significantly between local authorities. Examples provided of this were the licensees' experience of being asked for documentation during the process rather than being asked for everything at the start; the need to fill in multiple forms; and being asked to book a vehicle test far in advance and then waiting to have a confirmed date.
- **Barriers to Returning to Licensing with a GM local authority:** GM residents currently licensed outside the region indicated that returning to GM would require assurances around licensing costs, application processing times, and regulatory standards. Many view re-licensing in GM as a potential risk to their livelihoods.

1.3 Summary & Recommendations

Through the findings of this review, GM local authorities now have an opportunity to consider the future of their taxi licensing model, with the potential for better outcomes for the trade, licensing authorities and the public.

This review has been an extensive piece of work, reflecting the dynamic nature of the GM taxi market. Indeed, the national policy landscape for taxis has shifted even whilst the review has been underway, with indications that further change is to come.

While differences in perspective between trade and licensing bodies remain (and are possibly to be expected within any regulatory regime), there was a clear appetite for improvement from all we spoke to and there is now much for the GM local authorities to consider. With top-down change set to come to the sector as the findings of the Casey Audit are expected to be implemented nationally, GM is in a position to establish a model that others may follow.

In the immediate term, the recommendations of the Casey Audit, if implemented, are likely to mean more stringent practices for all local authorities, and addressing OOA working may lead to more applications for GM local authorities putting varying degrees of strain on district operational procedures. GM local authorities should consider if any further improvements can be made to their application processes and systems to make it faster and more transparent, consider improved communications, and increase the number of approved test centres to increase capacity and choice.

Elevating licensing powers to a city-region level would establish a unified standard, enable a region-wide system, and serve as a preliminary step in managing the loss of private hire vehicles to other non-GM authorities ahead of any legislative changes.

The Department for Transport has indicated that transferring taxi licensing powers from local authorities to Mayoral Combined Authorities (MCAs) could result in economies of scale, greater consistency in decision-making and put MCAs in a better position to address out-of-area licensing issues, as outlined in the English Devolution White Paper (December 2024).

Ultimately, it is for Greater Manchester to determine its preferred strategic direction.

We are not suggesting competing with non-GM authorities necessitates replicating their practices. However, if Greater Manchester intends to encourage drivers, vehicle owners, and operators to obtain licences within one of its ten local authorities, certain measures should be considered.

At a minimum, we recommend prioritising efforts to alleviate the burden of perceived bureaucratic obstacles by reconciling differing perspectives between industry stakeholders and local authorities. Additionally, enhancing transparency around processing times and clarifying public safety requirements that underpin licensing standards would be beneficial. Implementing these improvements would deliver immediate value independent of the wider operational model adopted.

We also recommend increasing the availability of test centres, as well as enhancing both the technology underpinning the application journey and support offered by staff throughout the application. Common application processes and a network of testing facilities would make the transition to MCAs that DfT are advocating easier.

Achieving these improvements will require investment and commitment from all parties. Implementing changes at the city-region level may present several challenges, but acknowledging these difficulties is necessary to deliver greater consistency of standards and ensure the ‘taxis’ Greater Manchester license offer a safe, accessible, reliable and high-quality experience for everyone.

This report presents three options for consideration by GM in determining its preferred strategic direction.

1. Enhancing regional collaboration through a GM model;
2. A unified administrative model; or
3. Maintaining existing arrangements.

All three operational options have pros and cons, and these are listed before each detailed set of recommendations.

1.3.1 Recommendations if enhancing regional collaboration through a GM model – transfer of administration, standards, enforcement and decision making

The pros and cons if this approach is adopted are outlined in the table below.

Pros
• Alignment with the Bee Network vision for an integrated London-style transport system • Could simplify processes and provide a consistent experience for all GM licensees. • Potential to reduce fees through greater efficiency from a GM-wide system. • Consistent enforcement and vehicle standards adopted across the city-region. • Operators would only need one licence. • Residents and visitors to GM should have a consistent experience.

• Distributes the burden and risk inherent in the cost recovery regulatory regime.
<u>Cons</u> • GM model will take time to develop, consult and adopt. • Requires appropriate collaborative governance structures and transfer of admin and enforcement staff from GM authorities into one operational unit. • Unified approach could disrupt remaining licensing functions in individual authorities. • Out-of-area operation issues persist without legislative change.

The recommendations proposed if the approach of enhancing regional collaboration through a GM model is adopted are:

- a. Clearly communicate GM's intention to enhance regional collaboration through a GM model.
- b. Develop a GM taxi licensing policy to establish clear standards throughout the city-region, promoting fairness and consistency for licensees while upholding service quality and ensuring public safety for passengers.
- c. Implement procedures that enhance the customer experience, and underpin with modern licensing software to optimise application tracking, processing, and reduce administrative costs.
- d. Establish a network of trusted, audited garages across GM to increase choice and convenience for licensees with a single vehicle testing standard.
- e. Evaluate driver and vehicle standards and identify which can be adapted for flexibility and those that are essential for public safety and cannot be compromised, allowing practical adjustments without reducing critical protections.
- f. Establish a dedicated taxi enforcement team to monitor and uphold compliance with the GM taxi licensing policy standards.
- g. In order to address trade uncertainty about changing vehicle standards, which is often related to additional vehicle costs for licensees, GM local authorities could implement "grandfather vehicle rights," which would stipulate that, once a vehicle is licensed, it remains on the fleet until reaching its age limit set at the time of initial licensing, regardless of any subsequent policy changes.
- h. Establish an industry working group to advise on how taxis can better align with the ambitions of the Bee Network and publish summaries of key discussions of the industry working group to ensure the trade is kept informed.
- i. Engage in regular, structured dialogue with trade representatives to gather feedback, address concerns, and clarify misconceptions, especially around complex or contentious issues and publish summaries of key discussions with trade representatives to ensure the trade is kept informed.
- j. Clearly communicate to the trade when standards are government-mandated to address misconceptions about local discretion.

- k. Recognise wheelchair accessible vehicles as a critical component of the Public Transport Network in the Local Transport Plan and use policy development to help maintain their viability.
- l. Regularly monitor and report annually on WAV availability to support inclusive transport for all residents.
- m. Actively monitor developments in national policy and participate in consultations and reviews aimed at addressing loopholes that enable licensees to operate outside their licensing area.

1.3.2 Recommendations if a single authority manages administration of GM taxi licensing – A unified administrative model where local authorities control standards, enforcement and decision making.

The pros and cons of this approach is adopted are outlined in the table below.

<u>Pros</u> • Could simplify processes and provide a consistent administration for all GM licensees. • Potential cost savings and lower fees due to administrative economies of scale. • Allows action on known administrative processing issues to address loss of PHV to other non-GM Authorities.
<u>Cons</u> • Achieving consistent enforcement and vehicle standards may take time to develop and adopt. • Variation may still arise if decision-making and enforcement are not consistently aligned across the relevant authorities. • Unified administration approach could disrupt remaining licensing functions in individual authorities. • Risks losing local relationships built in administration. • Out-of-area operation issues persist without legislative change. • Requires implementation of appropriate cross-GM governance structures and transfer of staff into one administrative unit.

The recommendations proposed if the approach of a unified administrative model is adopted are:

- a. Clearly communicate the intention to adopt a unified model of administration, including any decisions to pause, conclude, or revise previous work on establishing minimum licensing standards¹¹.

¹¹ MLS: Minimum Licensing Standards Greater Manchester's ten local councils developed a proposed set of common, minimum standards taxis drivers, vehicles and operators licensed in Greater Manchester, local authorities have been individually approving and integrating the standards into existing policies.

- b. Review existing licensing software to identify potential upgrades that could improve application tracking and processing efficiency, lower administrative costs and improve customer experience.¹²
- c. Critically assess individual fee components (e.g., knowledge tests, driver proficiency tests) to identify areas where costs could be reduced or processes streamlined.
- d. Monitor and look to minimise unnecessary fee increases to minimise licensee displacement, but ensure fees remain aligned with service delivery costs.
- e. Consider establishing a network of trusted, audited garages across Greater Manchester to increase choice and convenience for licensees.
- f. Explore regional collaboration to align vehicle testing standards and processes among the 10 authorities, potentially adopting a shared manual or standard.
- g. Evaluate driver and vehicle standards and identify which can be adapted for flexibility and those that are essential for public safety and cannot be compromised, allowing practical adjustments without reducing critical protections.
- h. Engage in regular, structured dialogue with trade representatives to gather feedback, address concerns, and clarify misconceptions, especially around complex or contentious issues, and publish summaries of key discussions with trade representatives to ensure the trade is kept informed.
- i. In order to address trade uncertainty about changing vehicle standards GM local authorities could implement "grandfather vehicle rights," which would stipulate that once a vehicle is licensed, it remains on the fleet until reaching its age limit set at the time of initial licensing, regardless of any subsequent policy changes.
- j. Clearly communicate to the trade when standards are government-mandated to address misconceptions about local discretion.
- k. Undertake regular peer review and sharing of best practices between authorities to improve consistency and effectiveness in enforcement.
- l. Continue ongoing collaboration and information sharing to strengthen enforcement across the region.
- m. Develop a Concordat or high-level agreement among GM local authorities to align enforcement standards and approaches, focusing on policy consistency rather than operational uniformity.
- n. Actively monitor developments in national policy and participate in consultations and reviews aimed at addressing loopholes that enable licensees to operate outside their licensing area.

¹² Some GM local authorities advised that their taxi licensing software is also used for other regulatory services. Additionally, some have long-term software contracts that are costly or difficult to terminate.

- o. Seek all opportunities to advocate for legislative changes that would restrict the practice of out-of-area licensing and promote a more consistent, locally accountable taxi licensing framework.
- p. Prepare contingency plans to rapidly scale taxi licensing and enforcement in response to national policy changes. Such readiness would enable the swift processing of increased application volumes, aligning with the expectations of the taxi trade for timely service, while safeguarding the high standards of public safety.
- q. Regularly monitor and report annually on WAV availability to support inclusive transport for all residents.

1.3.3 Recommendations – in the current system of licensing – maintaining existing arrangements around administration, standards, enforcement and decision making

The pros and cons of this approach is adopted are outlined in the table below.

<u>Pros</u> • Local authorities maintain existing arrangements and local knowledge. • Allows action on known issues to address loss of PHVs to other non-GM Authorities.
<u>Cons</u> • Potential efficiency gains from a GM-wide system are lost. • Out-of-area operation issues persist without legislative change. • Achieving consistent standards has presented challenges in the past. • Inconsistency remains if no unified administration/enforcement is adopted. • Strain on current resources to deliver report recommendations locally.

The recommendations proposed should the current system remain in place:

- a. Clearly communicate the intention to maintain the current model of licensing, including any decisions to pause, conclude, or revise previous work on establishing minimum licensing standards⁸.
- b. Review existing licensing software to identify potential upgrades, or alternative that could improve application tracking and processing efficiency, lower administrative costs and improve customer experience; consider joint procurement or shared investment.
- c. Continue reviewing licensing processes to reduce processing times. For instance, requiring all tests to be completed prior to submitting an application could enhance efficiency and enable authorities to process applications more promptly.
- d. Communicate clearly to the trade about process improvements and timelines.
- e. Peer review licensing administration practices among GM local authorities to identify best practices and areas for improvement.
- f. Critically assess individual fee components (e.g., knowledge tests, driver proficiency tests) to identify areas where costs could be reduced or processes streamlined.

- g. Monitor and look to minimise unnecessary fee increases to minimise licensee displacement, but ensure fees remain aligned with service delivery costs.
- h. Consider establishing a network of trusted, audited garages across Greater Manchester to increase choice and convenience for licensees.
- i. Explore regional collaboration to align vehicle testing standards and processes among the 10 authorities, potentially adopting a shared manual or standard.
- j. Evaluate driver and vehicle standards and identify which can be adapted for flexibility and those that are essential for public safety and cannot be compromised, allowing practical adjustments without reducing critical protections.
- k. Engage in regular, structured dialogue with trade representatives to gather feedback, address concerns, and clarify misconceptions, especially around complex or contentious issues and publish summaries of key discussions with trade representatives to ensure the trade is kept informed
- l. In order to address trade uncertainty about changing vehicle standards GM local authorities could implement "grandfather vehicle rights," which would stipulate that once a vehicle is licensed, it remains on the fleet until reaching its age limit set at the time of initial licensing, regardless of any subsequent policy changes.
- m. Clearly communicate to the trade when standards are government-mandated to address misconceptions about local discretion.
- n. Undertake regular peer review and sharing of best practices between authorities to improve consistency and effectiveness in enforcement.
- o. Continue ongoing collaboration and information sharing to strengthen enforcement across the region.
- p. Develop a Concordat or high-level agreement among GM local authorities to align enforcement standards and approaches, focusing on policy consistency rather than operational uniformity.
- q. Actively monitor developments in national policy and participate in consultations and reviews aimed at addressing loopholes that enable licensees to operate outside their licensing area.
- r. Seek all opportunities to advocate for legislative changes that would restrict the practice of out-of-area licensing and promote a more consistent, locally accountable taxi licensing framework.
- s. Prepare contingency plans to rapidly scale taxi licensing and enforcement in response to national policy changes. Such readiness would enable the swift processing of increased application volumes, aligning with the expectations of the taxi trade for timely service, while safeguarding the high standards of public safety.
- t. Regularly monitor and report annually on WAV availability to support inclusive transport for all residents.