North East Lincolnshire Council
Unmet Demand Survey

August 2025

Executive Summary

This Unmet Demand survey has been undertaken on behalf of North East Lincolnshire 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.

The evidence gathered in this unmet demand survey concludes there is no evidence of any unmet demand for the services of hackney carriages in the NEL licensing area which is significant. This result covers both patent and latent demand. In fact, there is strong counter evidence that the current limit policy provides public benefit and stability to the trade and on that basis should be retained.

During the course of the survey, it was identified that the 2013 policy of allowing any WAV hackney carriages to revert to saloon style vehicles was seeing high reductions in this style of vehicle, to the point that from a high of every other hackney carriage being a WAV to just one in six at this point in time. At peak, WAV were 47% (nearly every other vehicle) of the hackney carriage vehicle fleet. By 2016 this had reduced to 26%; by 2020 it was 33%, but for this survey the level is just 16%, one vehicle in six.

With evidence of increasing need for this style of vehicle, and the significant detriment inability to obtain one has on those needing them, this policy needs to be reversed. At the present time the total active hackney carriage plates numbers on issue are 204. The limit is 220 vehicles.

The study identifies how ranks currently work and an urgent need for review and better provision for night demand in Cleethorpes, as well as a rank nearer to the main town centre. The rank at Bethlehem Street would benefit strongly from the other three spaces being added to the rank length, with spare kerb space switched from removal of ranks in other parts of Grimsby town centre, particularly those in Victoria Road and Victoria Road West. Space to enable the review of Cleethorpes ranks could be found by removal of at least the Sea Road rank.

The markings for ranks, particularly at St Peters' Avenue and Grant Street, need to be refreshed, the ranks enforced and marketed and a review of usage undertaken perhaps in advance of the next demand survey.

This survey database should be refreshed with fresh rank observations undertaken certainly no later than March 2030, or possibly earlier if felt necessary.

Details from this Report should be shared with those in the transport policy section of the Council and more detailed involvement by the licensing section with the next LTP annual update would be of strong benefit. Addition of a some new taxi performance indices should be considered including numbers of vehicles, drivers and level of WAV provision.

Consideration should be given to producing an Integrated Transport Plan covering the present licensed vehicle service, if possible tied in with the area overall transport accessibility policies.

Contents

1 General introduction and background

North East Lincolnshire 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 most recently revised 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 operations. 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.

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 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 time horizon also be used for rank reviews and accessibility reviews. The latest BPG now seeks to tie the timeline for refreshing reviews with Local Transport Plan revisions, although these are not as frequent as the BPG appeared to assume

Present background to policy

A trend occurred which saw a good number of authorities remove their limits on hackney carriage vehicle numbers in favour of 'quality control', essentially requiring all new hackney carriages to be wheelchair accessible. This led to saloon style vehicles effectively having a limit and also gaining 'grandfather' rights to remain as such, although various developments and changes have been applied. Such requiring of WAV style vehicles is currently more difficult given the pressure on operating costs in conjunction with most WAV tending to be the higher polluting diesel vehicles.

More recent choices have seen authorities wishing to encourage more electric or sustainable fuel vehicles into both the private hire and hackney carriage fleets, although for some this has seen a strong reduction in the hackney carriage fleet numbers, including in London, where many of the remaining non-electric fleet are no longer being replaced when their current limit on age expires.

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 North East Lincolnshire, the current identifying features are that hackney carriages have a white plate on the rear in a prominent position, a taxi roof light, a tariff card and a white window sticker confirming the licence details. Private hire vehicles have a yellow plate on the rear in a prominent position, two half-moon door signs with the plate number on and a yellow window sticker confirming the licence details.

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 authorities. This is mainly due to some court cases in Scotland taking interpretation of the duty of the licensing authority further than is usual in England and Wales, requiring current knowledge of the status of unmet demand at all times, rather than just at the snap-shot taken every three years. However, the three year survey horizon has become generally accepted given the advice of the BPG and most locations that review regularly do within that timescale.

However, the pandemic minimised the number of studies undertaken since March 2020 and some previously limited authorities have now also taken the decision either to review or to remove their limit without any further observation of levels of demand. Further a number of previously number-limited hackney carriage fleets have been lost to political reorganisation, notably that seeing the merger of all previous North Yorkshire authorities into one large authority, removing in one go several formerly number-limited authorities.

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 yet 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". Little enforcement ever occurred regarding this as far as we are aware.

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. In any event this is irrelevant to Liverpool given its fully WAV policy.

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 refused driver database 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)".

Unmet Demand Case Law

In respect to case law impinging on unmet demand, the two most recent regularly quoted 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, which supercedes previous notes and DfT advice, 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. In the end a fresh survey was undertaken, finding no unmet demand, but undertaken on the established standards only.

The 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.

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.

Some consideration is now being given to further restricting private hire operation to reduce or eliminate drivers and operators obtaining licensed vehicles from authorities some distance from their operating locations.

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.

It is also planned to reduce the number of local authorities, with licensing also being considered for transfer to being within the remit of local transport authorities, which tend to operate on larger geographic areas, along the lines of Transport for London.

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 report title for North East Lincolnshire Council are:

- appointed Licensed Vehicle Surveys and Assessment (LVSA) on 20 March 2025
- in accordance with our proposals and discussions of early 2025
- as confirmed during the inception meeting for the survey held on 27 March 2025
- this survey was carried out between March and August 2025
- On street pedestrian survey work occurred in mid to late April 2025 (on a Tuesday and a Wednesday, as in 2020)
- the video rank observations occurred in late March 2025
- Licensed vehicle driver opinions and operating practices were canvassed using an electronically available and posted out survey during May and June 2025
- Key stakeholders were consulted throughout the period of the survey
- A draft of this Final Report was reviewed by the client during early August 2025
- and reported to the appropriate Council committee following acceptance by the client.

North East Lincolnshire Council is a unitary authority in the Yorkshire and Humber region of England, and in terms of background council policy able to determine its own planning, transport policy and highways. The current Local Transport Plan is refreshed annually and based on the current 2016-2032 vision, updated from LTP3 first adopted in 2011. It works alongside the emerging Local Plan to 2032. It makes clear that "the timescales and structure of the document have not been prescribed by Central Government" and confirms the Transport Strategy element will be refreshed every five years alongside a Delivery Plan which is more flexible in time and review terms.

The principal reference to taxi and private hire remains Section 3.6:

"Taxis and private hire vehicles are an important complement to both public and private transport. The role of both, and their integration with other modes of transport, will continue to be reviewed as part of the overall strategic development of transport in the Borough. We will work closely with taxi and private hire providers to ensure that policies currently adopted by the Council are fit for purpose and continue to meet the needs of the public. In particular we will look specifically at the needs of people with mobility impairments or other disabilities and those people who cannot access other public transport modes easily.

Key issues identified formally are to:

- ensure integration of taxi policy with wider transport policy
- ensure an appropriate supply of taxis and private hire vehicles
- ensure that the needs of people with mobility impairments and those with other disabilities are catered for

Two key performance indicators regarding taxis are the total number of taxis (SD13) and the number that are wheel chair accessible (SD14)." It should be noted unlike other modes where numbers of trips are used as indicators this is not the case for taxis; nor is there any clear discrimination between hackney carriage and private hire, matters that could be addressed using this document. The document suggests the above numbers are obtained from operators annually when they could be directly obtained from the licensing section, and they also omit private hire provisions.

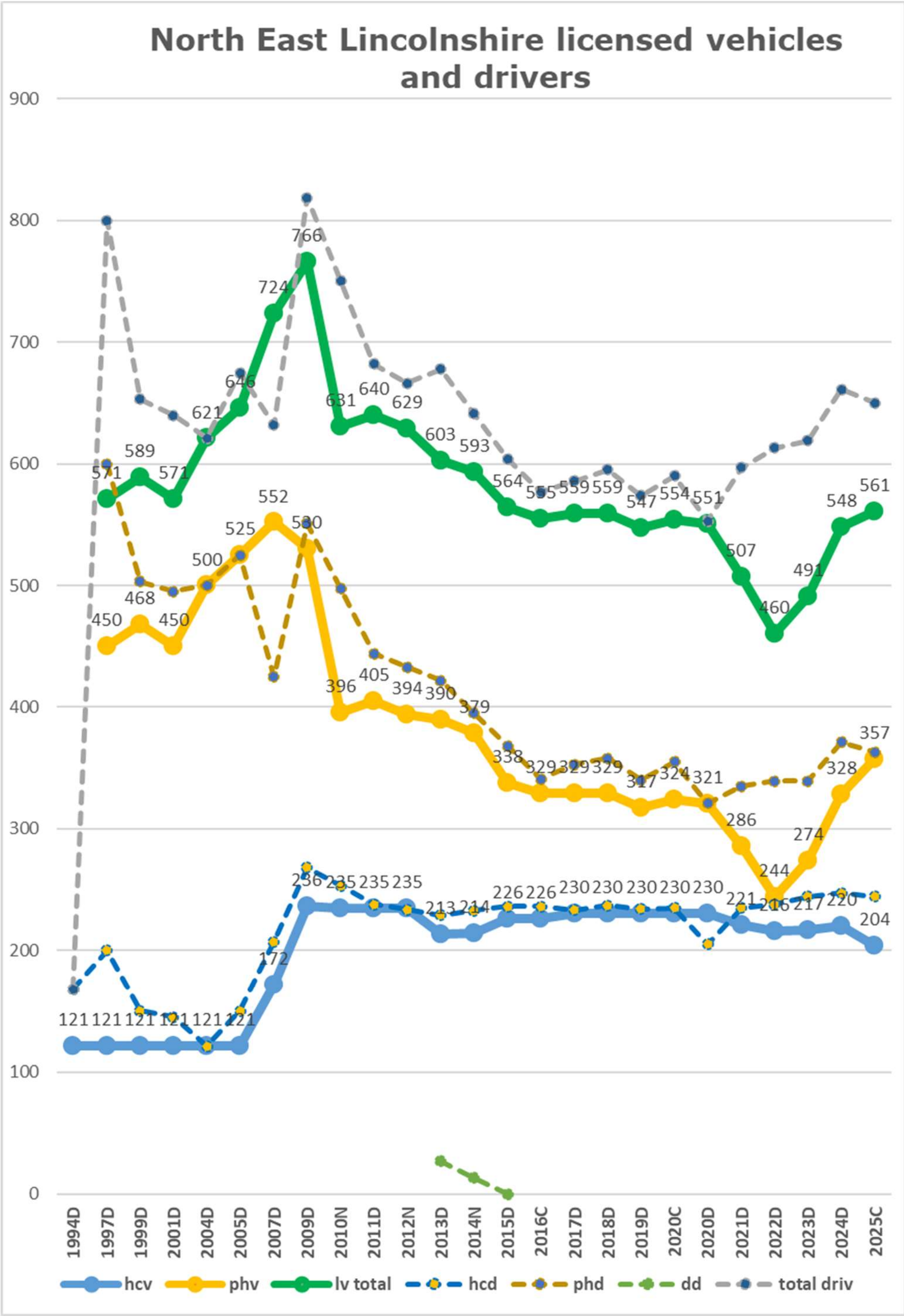
The authority has a current 2021 population of 156,966 (159,507 2020 estimates from the 2011 census, 2016 revision). For the full population, 51% were female and 49% male (as in 2020). This is very similar to the national average with slightly fewer males than in the Yorkshire and The Humber region.

For those aged 16 or more (those available for on-street interviews), the census 2023 projections (the latest publicly available) suggested there were 20% under 30, 38% 31-55 and 42% over 55 in the local population of the district, exactly the same as in 2020.

North East Lincolnshire Council has chosen to utilize its power to limit hackney carriage vehicle numbers. The limit was removed in 2005 but restored at the level of 235 in 2009, then reset again to 220 in 2012. Surveys were undertaken last in 2020, then in 2016, 2012 and 2009. Both this survey and the 2020 one were delayed from the preferred dates due to ongoing road works in the two main town centres.

In the 2021 census, the authority saw 9.2% of all usual residents whose day to day activities were limited a lot (higher than the 8.1% for Yorkshire and The Humber and higher again than the English average of 7.3%). Limited a little saw 11.2% (10.5 and 10); with physical or mental health conditions but whose day to day activities not limited 6.5% (6.9%, 6.8%) and with no conditions 73.1% (74.4%, 75.9%). This suggests a marginally higher need for adapted licensed vehicles than in either the region or across England on average.

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 figures are shown in the second picture.



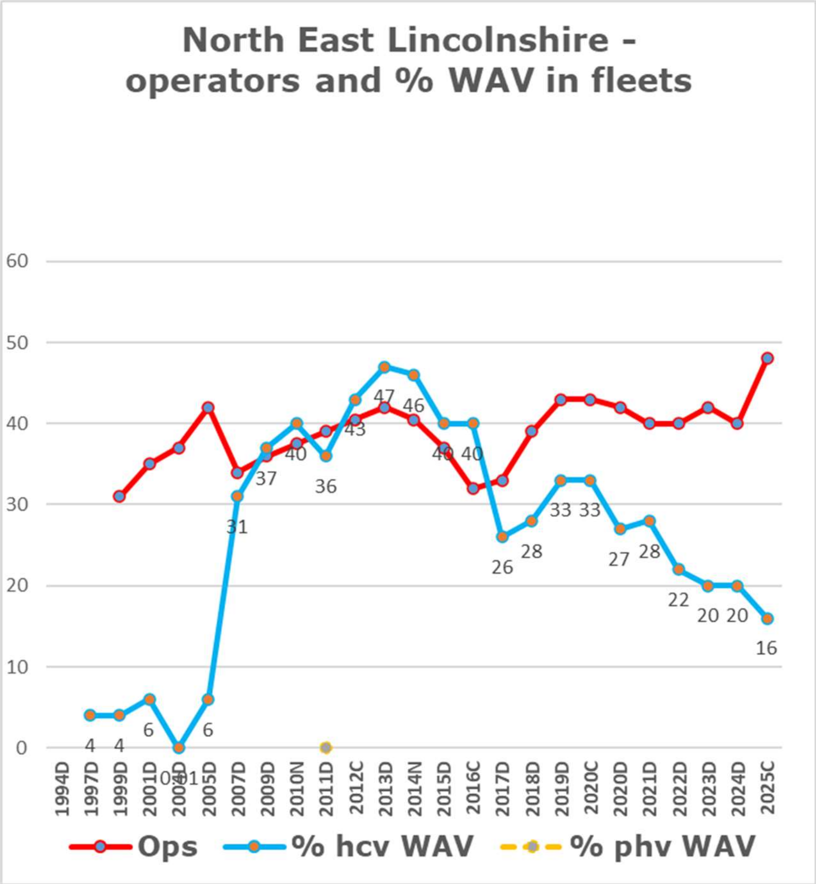
Licensing Statistics from 1994 to date

LVSA

The graph above shows the relative stability of the hackney carriage vehicle fleet numbers from 2009 onwards with the pandemic leading to a slight slump but with figures now lower than at any time since 2009. Private hire numbers had been falling until the pandemic saw a large drop, almost reducing that fleet to a similar size to the hackney carriage fleet, but their numbers have seen strong return in recent years, although at the time of the survey they still were lower than the 2010 level and still a long way from the earlier peak of over 550.

The same picture is true for the driver numbers. Again, the hackney carriage driver numbers are much more stable than the private hire.

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

This graph shows the initial impact of the limit removal on WAV style vehicles being very positive, given that new vehicles had to be that style. However, the peak of 47% of the hackney carriage fleet being WAV did not last, with the level reduced to 26% by the time of the 2016 survey, increasing to a peak of a third of the fleet just before the 2020 survey, but has then seen continual reduction with the current level being 16% of the fleet, the lowest level since the increase due to the policy change in the early 2000's. Further investigation found the 2013 policy allowing WAV style vehicles to revert to saloons had seen significant take-up to and this strong reduction of numbers.

Operator numbers had slumped a little but have now increased again to their highest ever level with recent statistics.

DfT statistics are available for all licensing authorities. This allows the proportion of WAV within both the pure hackney carriage and within the total licensed vehicle fleet to be compared to the English averages.

For the hackney carriage fleet, the WAV proportion at the 2020 survey was 33%. In the 2019 DfT statistics the average English value for mixed vehicle fleets was 23%. This put North East Lincolnshire above the average. However, in 2025, the latest DfT values have reduced marginally to 22% but the values for North East Lincolnshire are now 16%, well below the English average. Of the 199 mixed hackney carriage vehicle fleets, North East Lincolnshire lies 90th.

At its peak, WAV were 47% of the hackney carriage fleet, meaning almost every other vehicle was WAV style. This is now one vehicle in six.

For total licensed vehicles North East Lincolnshire performance is shown in a worse light as there are no private hire WAV. For the 2020 survey the overall WAV proportion in the total fleet was 14% putting the authority 100th equal out of the 292 licensing authorities then in place. By this survey, comparing to the 2024 Dft data, North East Lincolnshire was 142nd out of 267 with its total proportion of 8%. However, the proportion is now 5.7% which would place the authority 174th equal out of 267.

The table below summarises details from the 2021 census for the area, Yorkshire and The Humber and England:

Category	NEL	Y + H	England
Day to day activities limited a lot	9.2	8.1	7.3
Day to day activities limited a little	11.2	10.5	10.0
Disabled but not limiting activity	6.5	6.9	6.8
Not disabled	73.1	74.4	75.9

This suggests that North East Lincolnshire in 2021 had a higher level of people potentially likely to need WAV style or adapted licensed vehicles than either across Yorkshire and The Humber or England. This is true for both the limited a lot and limited a little categories. Further discussion of this occurs in the synthesis section of this Report.

3 Patent demand measurement (rank surveys)

As already recorded in Chapter 2, control of provision of on-street ranks in North East Lincolnshire is fully under the control of the highways section of the Council. Recent activity has seen significant development of the town centres across the authority with respect to public realm, which has impacted on rank provision. This has continued since the last survey, with further work to be undertaken. The rank observations were increased in order to provide information for the future revisions, particularly in Grimsby town centre.

A list of ranks in North East Lincolnshire at the time of this current survey was confirmed with highways. 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. The hours observed were agreed with the client, with the aim of covering every rank when it was believed to be used, whilst omitting operable hours not understood to see any usage. As already noted, extended hours were covered at lesser used ranks in order to confirm need for any future revisions.

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).

For the stake of clarity, for this survey, there have been no significant changes in rank provision since 2020.

Overview of rank observations

The observations of activity at and around the ranks provided some 524 (211 in 2025) hours of observation over the period covering Thursday 27th March to the early hours of Sunday 30th March 2025 (was Thursday 13th to Sunday 16th February 2020). Much of the extra hours were to ensure full cover of the lesser-used ranks.

During this period, some 12, 232 (13,305 in 2020) different activities were noted including pedestrian and vehicle arrivals and departures and some general notes of relevant activities. Of these records, 75% (73% in 2020) were vehicle arrivals or departures of all kinds of vehicles.

Of the vehicle arrivals and departures, 73% (77% 2020) of these were of local licensed hackney carriage vehicles. A further 6% (3%) of observations were local private hire vehicles with no more than a handful (0.2% in 2020) of all observations being licensed vehicles that did not appear to be local.

19% (17%) of all observations were private car arrivals or departures, with 0.04% (1%) emergency vehicles and 2.2% (1.8%) goods vehicles. The main location with cars using the rank, or nearby, in a way that might affect rank operation, was Victoria Street West (66% cars and 11% goods vehicles)(up from 36% last time), then Freeman Street Market (62% cars, was 56%, with 4% goods), then Bethlehem Street, Grimsby with 53% cars and 19% goods. Sea Road Cleethorpes saw 53% cars (was 21%) and High Street Cleethorpes 18% (same as in 2020). Some of these see very little if any hackney carriage activity.

The low level of abuse at High Street may be related to the more recent increased usage of those ranks as well as more modern marking. There was a lot less abuse of the St Peter's Street, Boots location, although it did not see any hackney carriage passengers, with its main vehicle use appearing to be drivers using it for personal business (but only a few times).

Nearly half of the vehicles using Sea Road Cleethorpes were private hire, with no hackney carriages seen there at all. A third of vehicles seen at the rank servicing Cleethorpes Station and St Peter's Street were private hire; although in the former case these moved if a hackney carriage arrived.

The informal location in George Street saw a relatively high level of activity, with the end nearest the coast used most by other than buses. 34% of vehicles stopping were cars, with 25% hackney carriages, 36% private hire and 5% goods. It appeared that this area was being used for pick up and set down in preference to Victoria Street West.

In terms of hackney carriage usage, the overall records suggest 61% (was 55% in 2020) of all observations were at the Station at Grimsby, 29% at High Street, Cleethorpes (as in 2020), 4% at the informal location in George St, 3.5% (was 3%) at Freeman Street Market, and 1.1% each at Victoria Street West (was 7%) and Bethlehem Street. 0.3% of hackney carriage movements were seen at Cleethorpes Station (was 1%).

Overall rank usage estimates

The information from the rank observations was used to estimate typical weekly passenger usage by rank. The table below shows the result of these estimates:

	Comparison of rank average weekly flow estimates									
Rank	**2025**		**2020**		**2016**		**2013**		**2009**	
Grimsby Station	4795	71%	4886	58%	4760	67%	3144	38%	4209	37%
High St, Cleethorpes	1559	23%	1752	21%	545	8%	856	10%	338	3%
George St, Grimsby, informal	189	2.8%	n/a		n/a		n/a		n/a	
Freeman St Market	119	1.8%	335	4%	423	6%	440	5%	511	4%
Bethlehem St, Grimsby	46	0.7%	Included with Grimsby Station							
Victoria St West, Grimsby	42	0.6%	569	7%	1203	17%	2156	26%	3089	27%
Market St, Cleethorpes	0		812	10%	97	1%	1379	17%	230	2%
Station, Cleethorpes	0		61	1%	90	1%	229	3%	270	2%
Sea Rd, Cleethorpes	0		0	0%	10	0.0%	0	0%	601	5%
St Peter's Ave, Cleethorpes	0		15	0.0%	0	0%				
Victoria Street South, Grimsby	0									
St Mary's Gate, Pygott and Crone	0									
Osborne Street	0									
Riverhead Bus Stance, Grimsby	n/a		n/a		n/a		n/a		2268	20%
Totals	6750		8430		7128		8204		11516	
Change from 2020	-20%									
Change from 2016	-5%		+18%							
Change from 2013	-18%		+3%		-13%					
Change from 2009	-41%		-27%		-38%		-29%			
Cleethorpes Night			2564		642		2235		568	

From the current observations, there are 6,750 (was 8,430) passenger departures in a typical week from all ranks in the NEL licensing area – one fifth down on 2020. The bulk of these, some 71% (58% in 2020) are from the station rank at Grimsby. 23% (21%) are from High Street Cleethorpes, 2.8% from the informal George Street, Grimsby location, 1.8% (was 4%) from Freeman Street Market, 0.7% from the non-station related patronage of the Bethlehem Street rank, and 0.6% (was 7%) from Victoria St, Grimsby.

The 1% from the Cleethorpes Station rank of 2020 has now dropped to zero, as has the former 10% from Market Street Cleethorpes, and the small number of passengers seen in 2020 at the St Peter's Avenue site. There is very strong consistency between the actual numbers of passengers using the Grimsby station rank over the last three surveys. The figures below show the changes in passenger numbers leaving this station from national passenger estimates. The peak passenger flows were in 2018/19, with growth between the 2016 and 2020 survey around 8%, but from 2020 to the current around an 11% decline. The position of the station in the overall table is 947th out of 2,581, a position only changed upwards from 948th in 2020.

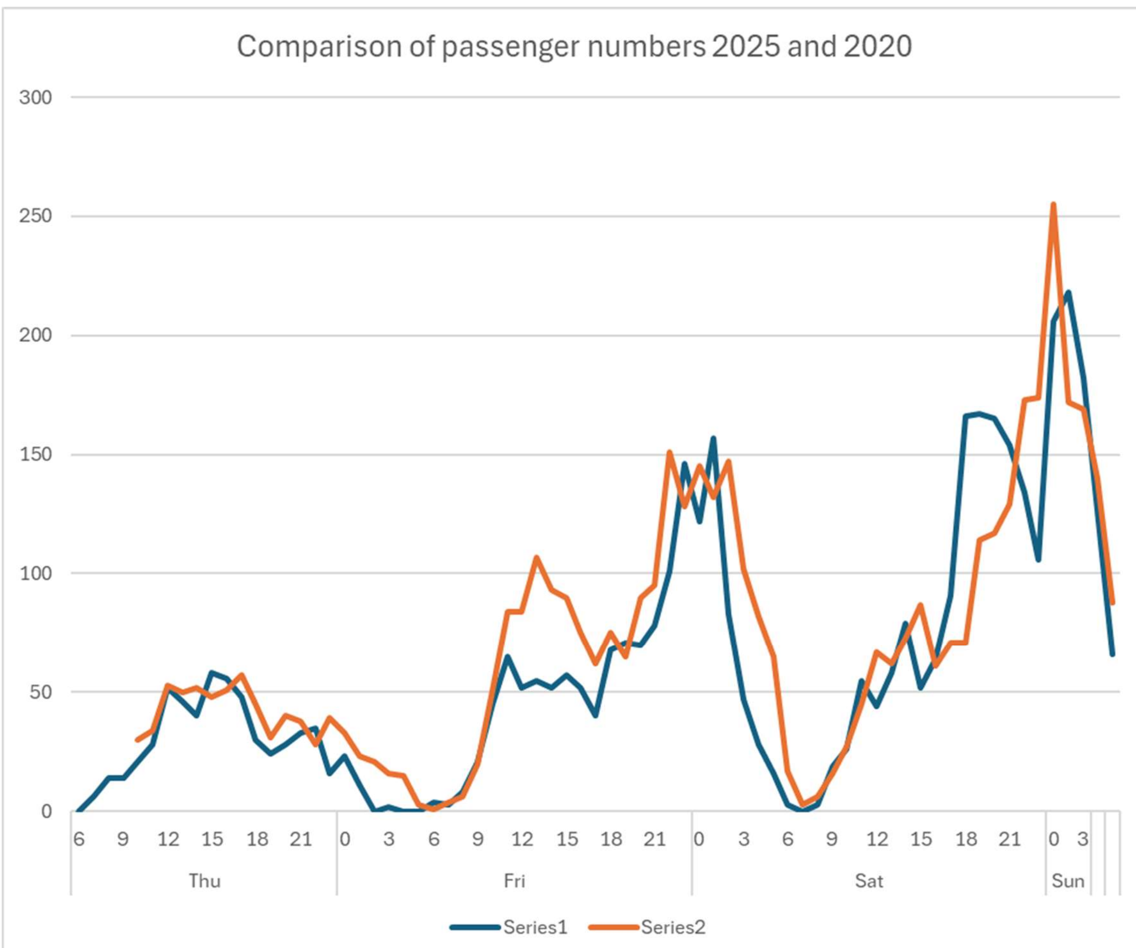
Rail year (ends March in last year noted)	Entries / exits	Growth / decline
Grimsby Town (947th) (Trans Pennine Express)		
1997 / 1998	330,316	n/a
1998 / 1999	335,720	+2%
1999 / 2000	373,011	+11%
2000 / 2001	362,451	-3%
2001 / 2002	384,413	+6%
2002 / 2003	380,874	-1%
2004 / 2005 (no data for 03/04)	385,532	+1%
2005 / 2006	380,732	-1%
2006 / 2007	403,284	+6%
2007 /2008	404,048	+0.2%
2008 / 2009	411,860	+2%
2009 / 2010	391,982	-5%
2010 / 2011	416,870	+6%
2011 / 2012	448,080	+7%
2012 / 2013	438,522	-2%
2013 / 2014	427,367	-3%
2014 / 2015	451,658	+6%
2015 / 2016	422,136	-7%
2016 / 2017	438,050	+4%
2017 / 2018	454,166	+4%
2018 / 2019	456,768	+1%
2019 / 2020	432,356	-5%
2020 / 2021	98,534	-77%
2021 / 2022	318,486	+223%
2022 / 2023	316,220	-1%
2023 / 2024	385,812	+22%
Growth for survey (2015/6 to 2018/9) (2019/20 to 2023/4) (and from 97/98)		+8% -11% (+38%)

If an estimate of weekly passengers leaving the station is made by dividing the annual total by half, then by 50, weekly passenger numbers leaving the station were 4,381 in 2016, 4,324 in 2020 and 3,858 in 2025. Comparing these numbers to passengers leaving in hackney carriages shows the levels as 109%, 113% and 124% respectively, suggesting that passengers must use the station rank from other than trains. The level of this ratio has also increased as rail flows have fallen, suggesting increasing external use of this rank. This may relate to the proximity to the nearby public house and to the town centre.

The operation of the night demand in Cleethorpes has changed since 2020. The actual High Street rank on the northern side of the road sees little usage and more activity from private cars. An alternative informal location has been taken up on the southern side of High Street just west of Osborne Street. Vehicles feed into this rank from Market Street via Osborne Street (the turn from Osborne Street into High Street is forced to the left). The Market Street rank in these observations was nearly always full of parked private cars, but at peak hackney carriages filled Osborne Street and overflowed into Market Street. This appears to have occurred due to a move in the active locations providing demand, away from the western end of High Street more towards the eastern end (and actually towards the Grant Street rank).

Rank usage by location and time

The data collected was graphed to show variation over time. The graph below plots all data collected (but only for hours ranks were observed). Series 1 is the latest 2025 data and series 2 the previous totals from 2020.



Ranks were generally covered for all operational hours during the course of the survey, although some small flows may have been omitted through our sample choice. However, the general picture above shows the difference between Thursdays, Fridays and Saturdays in NEL. It does also show that in 2025 there were two hours in the early hours of Friday and one in the 07:00 hour on the Saturday when there were no passengers using hackney carriages from ranks in the area. In 2020 there was no time over the observation period when there was no flow at any rank across the range of active ranks. There is little evening flow on the Thursday (and this is reduced in 2025), but both Fridays and Saturdays see highest flows in evenings. The Saturday night flows are greatest, with a clear peak observable.

Comparing 2020 and 2025, the pattern of demand over the three observed days is remarkably similar. 2025 is, however, generally lower although the Friday peak was marginally higher in 2025. Late afternoon flows on the Saturday were also higher in 2025. The early Sunday morning peak in 2025 was an hour later but the Friday / Saturday peak three hours later.

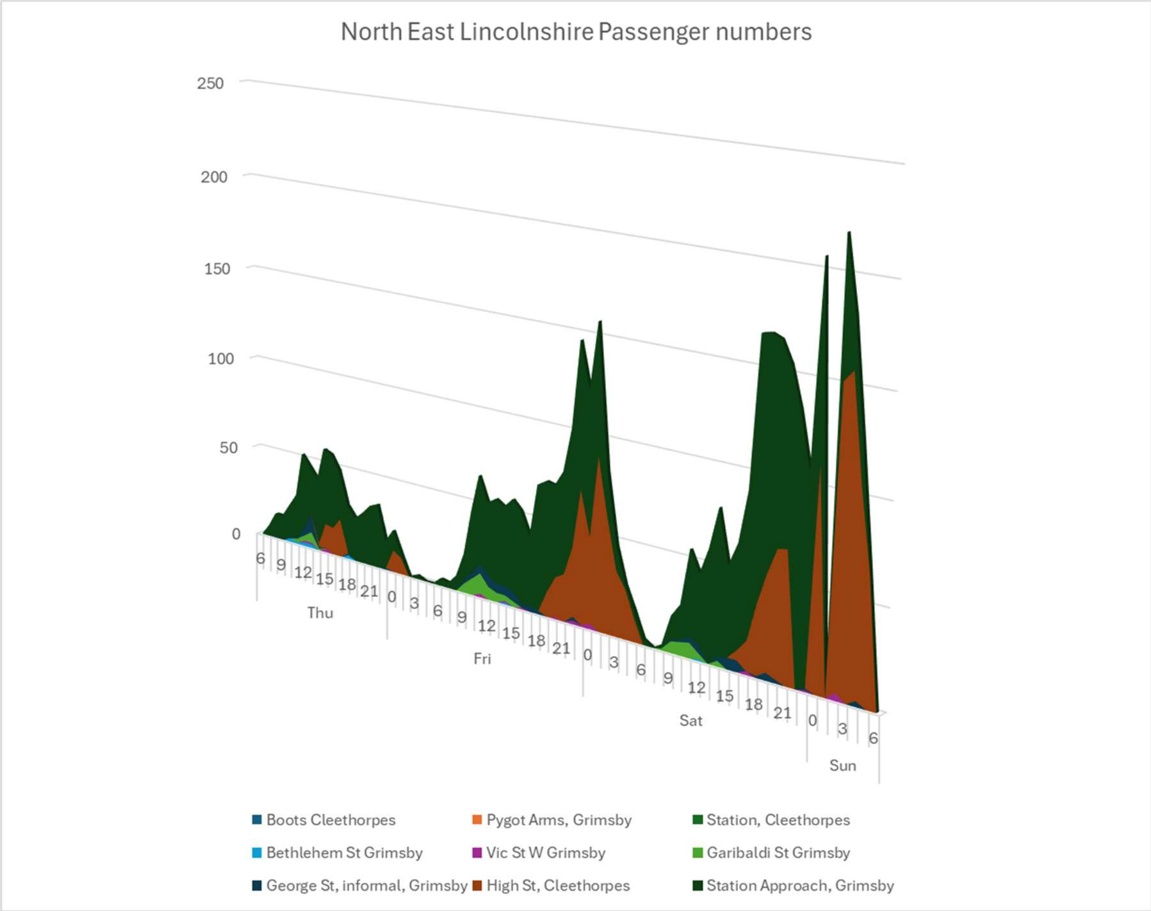
In 2025, the Friday night peak was 72% (just under 60% in 2020) of that of the Saturday. The Friday / Saturday peak was in the 01:00 hour (22:00 hour in 2020), with flows being 101 or more for the four hours 22:00 to 01:00 (much sharper than in 2020 when flows were 102 or more from the 22:00 hour until the 03:00 hour the next morning (some six hours). On the Saturday night, 2025 flows were 166 in the 18:00 hour and stayed 106 or more through some ten hours; in 2020 flows were 114 or more from the 19:00 hour right through to the 03:00 hour (nine hours), with the peak being 218 in the 01:00 hour (255 in the midnight hour in 2020). These are detailed differences but also clearly different patterns between the two surveys.

Overall, comparing the two surveys, 2025 flows were 13% lower on the actual observations. The peak flow was 15% lower in 2025. However, there were 30% of the hours observed in both surveys where the 2025 flow was actually higher than 2020; mainly during Saturday and Saturday night / Sunday morning.

The only other hour through our period of observation with more than 100 passengers in 2020 was the 13:00 hour on the Friday. In 2025, flows over 100 passengers did not occur until the 22:00 hour on the Friday.

The peak flow was 3.7 (3.6 in 2020) times the typical average flow across our survey period of some 59 (72) passengers per hour. The sharp peak on the Saturday still evident in 2025 suggests demand in NEL is peaky, although there is also a strong disparity between night and day flows on both Friday and Saturday nights.

The graph below considers each rank through the days observed:



The graph shows the importance of the Grimsby station rank to passenger levels. It is the dominant rank throughout all hours in the area (and more so than it was in 2020). However, at night the High Street rank in Cleethorpes is well used (but not as dominant as in 2020). This is true for each night including Thursdays, although the impact is strongest on Saturday.

Garibaldi Street (Freeman Street Market) continues, as in 2020, to make a valuable contribution to passenger flows but only during its limited hours of operation. At the time of the survey, the hours would have been 0900-1700 Tuesday, Friday and Saturday with the Food Court open from 0900-1400 on Wednesdays and Thursdays.

The profile of usage was different on the Friday and Saturday, with higher but peakier flows on the Friday and more consistently even, but overall lower, flows on the Saturday. This was the same as in 2020 albeit at a lower overall level.

A major change in 2025 is that Victoria Street West now sees only sporadic usage. It seems to see more impact from vehicles servicing the adjacent take-away, including taxis at the end of the day taking staff home from that site.

There seems to be more usage of the informal location at the northern end of George Street near to Victoria Street West and the main corner of the town centre. This is a key drop off and pick up point for private cars, private hire and hackney carriage.

It was also noted that Bethlehem Street has a number of different uses. These are summarised in the table below:

Day	Feed Station	Take passengers	Move away
Thursday	8	4	11
Friday	4	2	9
Saturday	None	1	2

Although some vehicles do wait at this location for space at the station rank, the main usage appeared to be vehicles waiting here and then moving off, possibly to service bookings, some of which u-turned whilst most simply headed off in the same direction out of town. A small number on each day picked up passengers who arrived from the direction of the town centre. There were no vehicles feeding the station observed during the Saturday at all.

Our observations suggest that the plan to move this rank within the current space to make it easier for vehicles to use to feed the station may have unintended consequences. This would marginally increase the distance for those using the rank from the town centre and might therefore reduce this usage. The use as a station feeder is as shown above the second most used purpose, with the main usage being vehicles pausing here before moving away from the area, presumably to service bookings elsewhere.

It would be preferable to use the spaces removed from the two other unused Grimsby ranks (see below) and transfer these to enable the full bay to be given over to hackney carriages, which would help with enforcement and clarity and enable its triple function to be better provided for.

Other ranks

As requested, all current ranks were observed across their full operating hours. Comments about these are as follows:

Cleethorpes:

Market Street – no usage by passengers and only marginal usage by waiting vehicles at peak overnight periods – high levels of private parking – overall review needed of current actual need including consideration of removal of main High Street site and formalisation of present operating situation.

Sea Road – only used by private hire picking up passengers from late night coach arrivals – could be removed

St Peter's Avenue – no passengers, small number of hackney carriage vehicles (some appeared to be for driver personal business), less abused than in 2020 – if to be kept needs to be re-marked and advertised

Station ranks – Grant Street and feeder – used by vehicles in daytime to wait but no passengers observed, not even at night when nearby pub is very busy – needs to be re-marked, advertised and enforced.

Grimsby:

Victoria Street South – unused, some private parking, can be removed as planned.

Osborne Street – no longer used nor of any value and can be removed, as planned.

St Mary's Gate, Pygott and Crone – minor usage by vehicles to wait presumably for bookings – has value in retention for this purpose particularly as it faces towards the town centre.

Consideration should be given to using some of the spaces released in Grimsby to provision of a small rank at the Victoria Street West end of George Street. This would allow the current Victoria Street West location to be released as well as replacing the long-lost Bus Station rank provision. Some form of informal agreement is also needed as to where private hire should more appropriately allow passengers to be set down and picked up from the main town centre.

Surveyed hours with observed unmet demand

The individual hours at each rank were reviewed and only those with any average passenger delay at all were identified. These are sites where at least one passenger arrived and had to wait for a vehicle to arrive at the rank. This excludes any 'geometric' delay (i.e. where people have to wait for a vehicle to move up).

Of the total hours observed, 8% (18% in 2020) had delays recorded, although only 2% (6%) had delays that were a minute or more. Translated to passenger numbers, just 2% (1% 2020) of all passengers had to wait in hours when the average passenger delay was a minute or more with a further 4% (3%) experiencing a delay when the overall average passenger delay was less than a minute.

The largest average passenger delay was 19 minutes at Bethlehem Street at 14:00 on the Friday (just over 3.5 in 2020 in the midnight hour on the Friday). However, flows in this hour at that site were small, and they were the only passenger travelling in that hour. The next largest passenger delay, just under 15 minutes, was at Garibaldi Street (Market) in the following hour, but again the number of passengers in this hour was just three, two of whom left together with no delay. The next four highest APD (and all but one of those longer than two minutes) were also in hours with five or less passengers within that hour, periods it is hard to meet passenger demand in.

The final APD over two minutes (just over three) and all remaining delays of a minute or more occurred in periods of higher flows. All of the under a minute APD occurrences were in periods of higher flows.

Using another measurement, 5% (3% 2020) of all passengers waited for between one and five minutes, 0.6% (0.3%) had waits of six to ten minutes, and 0.3% (0.04%) waited between 11 and 19 (12 in 2020) minutes (the maximum observed wait recorded).

These figures show that overall levels of delay are reduced from 2020, but that the individual experience of delay had actually increased.

Considering delay further, of total delay, 39% was on the Thursday, 34% on the Friday and 26% on the Saturday (both the latter include into the early hours of the next morning). There were just two hours when total delay in the hour was over an hour of waiting. There was nearly two hours of total waiting in the 21:00 hour on the Thursday at Grimsby Station; and just over an hour in total waiting at the same location at 18:00 on the Saturday.

Looking at delay by location, 59% of total delay was at the Grimsby Station rank, 17% at Garibaldi Street (Market), 15% at Cleethorpes High Street, 4% at the informal George Street location in Grimsby, 3% (just one case) at Bethlehem Street and 3% (again just a single incident) at Victoria Street West.

Overall, in summary, none of these are particularly high values. Further discussion of how significant these experiences of unmet demand are occurs in the later Chapter.

Persons walking away from ranks

The rank observations saw a total of 96 (144 in 2022) passengers walk away from ranks during the course of the surveys. 74% (57%) of these were at Grimsby station whilst 23% (31%) were at High Street, Cleethorpes, with 2% this time (two people) at Garibaldi Street (Market) and one person (1%) at the George Street informal location.

Whilst typically some were reactions to no vehicle being there, others were friends that left once they had seen others board vehicles and some clearly made decisions not to use licensed vehicles even though present. Some may have left in private cars whose drivers had suggested they wait near the rank (although any actually observed to leave in camera shot would have been recorded as such).

Frequency of vehicle operation during rank survey

A test was undertaken to identify a sample of the vehicles active during the rank survey period. Plates were recorded at four locations (similar to in the previous survey) on the Saturday the rank observations were undertaken. Care was taken to keep the observations undertaken in such a way not to alert the trade to either these or the main rank work being carried out. For this survey, observations were also undertaken on the Thursday and Friday. This is now necessary to identify changes in working patterns and any out of town vehicle levels given the post-pandemic changes in the industry.

Some 361 different licensed vehicle movements were recorded over the seven hours sampled over all three days (21 hours in total). The plates recorded were reviewed and any that related to non-issued or non-hackney carriage vehicles were removed. Just one (nine in 2020) observation was found to be other than local hackney carriages (that was from North Lincolnshire). 76% were local hackney carriages, 7% local WAV hackney carriages and the remaining 17% local private hire.

It should be noted that the values below are based on a total hackney carriage fleet level of 204 vehicles. Further, the revised route of hackney carriages operating in Cleethorpes at night meant our previous observation location saw much less activity in 2025 than in 2020, meaning some observations in Cleethorpes under-estimate activity there.

During the course of the observations, 47% (a third in 2020) of the local hackney carriage fleet was observed.

However, the proportion observed was much reduced in each of the different samples. The highest proportion of the fleet observed in any one 1.5 hour period was 15% (both on Friday afternoon and Saturday night) (14% 2020, but Saturday) in the Friday afternoon and the early evening Saturday Station observations.

The table below compares proportions of the total fleet seen by times and days (percentages of total hackney carriage fleet observed).

Time/place: Day	Grimsby Station 1400/1530	Grant St Cleethorpes 1600/1730	Grimsby Station 1830/1930	Sea Road Cleethorpes 2130/2300	Town Hall Grimsby 0000/0130
Thursday	9	1	6	0	1
Friday	15	7	11	7	3
Saturday	12	1	15	0	4

The daytime observations see their peak levels of operation on Fridays, whilst the evening observations peak on Saturdays. This matches the variation in overall demand.

In 2025, over the three days observed, 15% of the total fleet was seen on the Thursday, 31% on the Friday and 25% on the Saturday.

Just 7% of the fleet were observed active on all three days, in at least one of the time periods. 40% of those operating were seen just once, and 26% just twice. The most frequent plate was seen 16 times, with another 13 times and two others for each of 11 and 12 times.

Eight (25%) of the WAV fleet were observed. None were observed on the Thursday, five on the Friday and three on the Saturday. The Friday observations saw WAV cover all time periods whilst the Saturday only covered observations in Grimsby. On the Saturday there was one vehicle observed twice in the morning, another three times early evening and again three times in the early hours observations, and another twice in the early evening. Just one vehicle was observed operating on both days, being seen five times on the Friday and six on the Saturday.

Observed usage for those with disabilities

Of all the hackney carriage vehicles observed, 13% (29% 2020) were noted as appearing to be wheel chair accessible vehicle styles (WAV). This is marginally less than the 16% (33% 2020) proportion of the fleet that are actually WAV style. This suggests little difference in preference for service for the different styles of vehicle.

During the period of the survey, 5 (12 in 2020) people at the Grimsby Station rank and three at the George St informal location were seen. This time note were seen at the Market rank (was two in both previous surveys). This total of eight is a reduced level of usage from the 10 in 2016 and 14 in 2020.

A further 36 (64) people, 29 (52) at the station, 2 (9) at the Market, two at Victoria Street West (as in 2020) and three at the George St informal location (but none (one) at High Street, Cleethorpes) were observed with disabilities that required assistance in to vehicles. This was lower than the level in 2020 although that had been a large increase from 2016.

Other rail stations

To set the context, there are seven other stations in the authority area. Their ranks range from 1,201st (Cleethorpes) to Habrough (2,022nd), Healing (2,387th), Great Coates (2,418th), Stallingborough (2,419th), Grimsby Docks (2,452nd), and New Clee (2,473rd). Average weekly passengers leaving Cleethorpes were 2,526 and New Clee 53. Only Cleethorpes has a rank near, which this time saw no observed usage by passengers. It is therefore clear that there is insufficient demand for any hackney carriage service to any other station in the area.

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 this survey, a robust total of 185 (200 in 2020) interviews were obtained, with 47 (50) in Cleethorpes and 138 (150) in central Grimsby, the only two locations with large enough concentrations of people to allow cost-effective on street interviews to occur. In 2016 a larger but broader sample was obtained, covering Immingham, Laceby/Healing and New Waltham/Humberstone with small samples, but still giving 200 or thereabouts from the Grimsby and Cleethorpes samples.

The resulting sample in 2025 was checked against the current 2023 projections from the 2021 census. The proportion of males interviewed was higher than the census estimate, some 39% (was 51% 2020 and 41% in 2016) interviewed were male compared to an estimated 49% in the census, with a corresponding larger amount of females interviewed. With reference to age groups, we interviewed more younger, and fewer middle and older age group persons than the census would suggest (27% young compared to 20% census, 33% mid compared to 38% census and 40% older compared to 42% census) (the census proportions were the same for 2020 and 2023). We do not consider this will have a severe impact on results but the differences will be borne in mind in the interpretation below. A higher proportion of younger people will tend to favour app-based licensed vehicle use against more traditional formats.

When reviewing the area results, the Grimsby gender proportion was closer to the census values, with a similar pattern to the total for the age structure. The Cleethorpes sample (smaller and therefore less likely to readily match) saw 34% interviewees being men, but a worse match to the age profile (36% young compared to 20%, 34% mid compared to 38% and 30% older compared to 42%).

88% (91% 2020 and 96% 2016) of respondents said they were from the North East Lincolnshire area. For this survey, the level for Cleethorpes was much lower, 72% whilst Grimsby were 93% local people, which probably fits with the nature of Cleethorpes.

For Grimsby, a third were from Louth, and 11% each from Scunthorpe, Penistone, Dairycotes (Hull), Skegness, east of Lincoln and Market Rasen; for Cleethorpes there were some more distant places with 15% each from central Leeds, Manchester, Doncaster and Sheffield and 8% each from Grimesthorpe north east of Sheffield and Louth. 23% were from two Scunthorpe postcodes. In 2020, the bulk of those not from the area gave Doncaster postal area codes, although there were a few further away quoted (including someone from Spain).

For the full sample, 57% (40% 2020, 90% 2016, although that year question was not time-related) said they had used a local licensed vehicle in the last three months.. The area results were very different – with 35% (30%) in Cleethorpes and 65% (43%) in Grimsby. 19% said by hackney carriage only, 20% by private hire only, and 19% by both kinds of vehicle. Values for Cleethorpes were consistently lower, being 13%, 13% and 9% respectively compared to 20%, 22% and 23%.

For 2025, the dominant response in terms of frequency was 29% who said in Grimsby they used licensed vehicles overall once or twice a week. Those saying 'never' were 14% in Grimsby (was 35%) but 42% in Cleethorpes (the latter value the same as in 2020).

The resulting overall level of trips per person per month is 2.6 (1.7) for Grimsby, 0.4 (0.5) for Cleethorpes and 2.0 overall (was 1.4 in 2020)

For hackney carriage usage frequency, the top value was 30% in Grimsby saying once or twice a week. Next was once or twice a month, fairly consistent between the two locations (25% overall, 25% Grimsby and 27% Cleethorpes). Resulting trips per person per month are 1.1, 0.3 and 0.9 respectively, leading to an estimate that 42% of Grimsby, 73% of Cleethorpes and 43% (was 68%) of trips overall were by hackney carriage.

In 2025, just 6% in Grimsby and none in Cleethorpes (5% overall compared to 40% in 2020 and 44% in 2016) could not remember when they had last used a hackney carriage. For 2025, none said they could not remember seeing a hackney carriage in the area, a very positive result and a continued reduction from the values of 15% in 2016 and 3% in 2020.

People told us how they obtained licensed vehicles. 72% (63% in 2020) gave a response, with one giving four (none 2020), another giving three responses (as in 2020) and 29% (31%) giving two responses.

For the full area result, 52% (59% 2020 and 52% 2016) of responses said they telephoned. 37% got them at a rank (same as 2020, and up from 18% in 2016), 6% (3% 2020, none 2016) used an app and 4% (1%, 2020 and 2016) hailed.

When considering area specific responses, the rank proportion was similar for both areas, with hailing higher in Cleethorpes (15% compared to 1%) and app use lower (3% compared to 7%).

44% (47% 2020) only telephoned, 23% (18%) only used ranks, 2% (3%) mainly used apps with 20% (30%) using a mix of rank and telephone.

49% (47%) of those interviewed gave at least one name of a company they phoned to obtain licensed vehicles. Of these, 4% (7%) named three companies, 20% (28%) two and 76% (66%) just one company. This suggests there is competition in the area, but also a reasonable level of satisfaction that means people are happy just to be aware of a single number in most cases, with suggestion this has improved since 2020.

Nine (15 in 2020, marginally less than in 2016) different names or numbers were quoted with regard to those they phoned to obtain licensed vehicles. The top five now were the same as the top five quoted in 2020. The top company, and the one with the most references in its own right, took 44% now (24% 2020 and 16% 2016) of mentions. The second company was also placed similarly in 2020 (21% now, 20% in 2020), but in 2020 also saw a further 6% of responses linked to its hackney carriage arm (not mentioned this time).

Two other companies took 17% and 15% of mentions (one only when the phone number is included as well as the name). Another took 9% shared between its name and number. All others took 3% of mentions or less. This confirms a good level of competition occurs in the area, but that this has not changed since 2020. The third company this time (19%) was fourth in 2020 (15%), the fourth (10%) had been fifth (9%) and the fifth company had been third in 2020, dropping share from 17% in 2020 to 3% now. The four other companies only got a single mention and were not previously mentioned. The top company in 2016, getting 29% share then, had dropped to 15% and is now third with 19%. The top five were all named in both areas.

This time, five local-based apps were mentioned, with the top one (57% of mentions) related to the top quoted company. Three other apps were also linked to the next three companies – the company that had dropped down the level of mentions was not stated as having an app. In 2020 just one local based app had been mentioned, for the top company.

People were then asked about the ranks they were aware of in the licensing area. 72% (52% 2020) of those interviewed provided at least one rank and if they used that location or not. Of the respondents, 14% (22%) provided three ranks, 26% (40%) provided two and 61% (38%) gave a single response of a rank they were aware of.

The initial response for the area provided 13 (25 in 2020 and 28 in 2016) different names for rank locations across the area. Of these, six were current rank locations and one was the same name for one of the six (Garibaldi Street and Freeman Street). Three locations were not easy to confirm, whilst a rank at the hospital was named (as in 2020) as well as mention being made of “Riverhead” (which is now pedestrianised) (see further below).

Of all the rank mentions, 48% (45% 2020) named a location and said they used that location with the slightly larger proportion naming locations but saying they did not use them. This level was similar in both areas again in 2025.

The most mentioned rank was that at Grimsby station, with 59% (44% 2022 and 36% 2016) of all mentions. 58% (just over half 2020) that mentioned it said they used it. The second most quoted rank in 2025 was Cleethorpes Market Place, with 10% of the total vote (20% Cleethorpes, 8% Grimsby). It had been third equal in 2020 with 6% of the overall vote. In 2025, 35% said they used it (75% 2020 and 14% 2016).

The third most quoted rank, with 8% overall, 3% in Cleethorpes and 9% in Grimsby, was “Riverhead”. This had been fifth in 2020 with 5% overall. It is assumed to be the George Street informal location noted in the rank surveys given that Riverhead has been pedestrianised for some while. 63% of respondents said they used it. Fourth highest was Cleethorpes Station (7% overall, with 30% in Cleethorpes and 3% in Grimsby)(2% with half using it in 2020). This location had been eighth equal with 2% overall in 2020. In 2025 responses, 29% said they used it. Next, if taken together, was 6% naming Garibaldi Street / Freeman Street. This had only been mentioned once as ‘Iceland Freeman Street’ in 2020. However, in total just 8% said they used it. It was not mentioned by anyone in Cleethorpes.

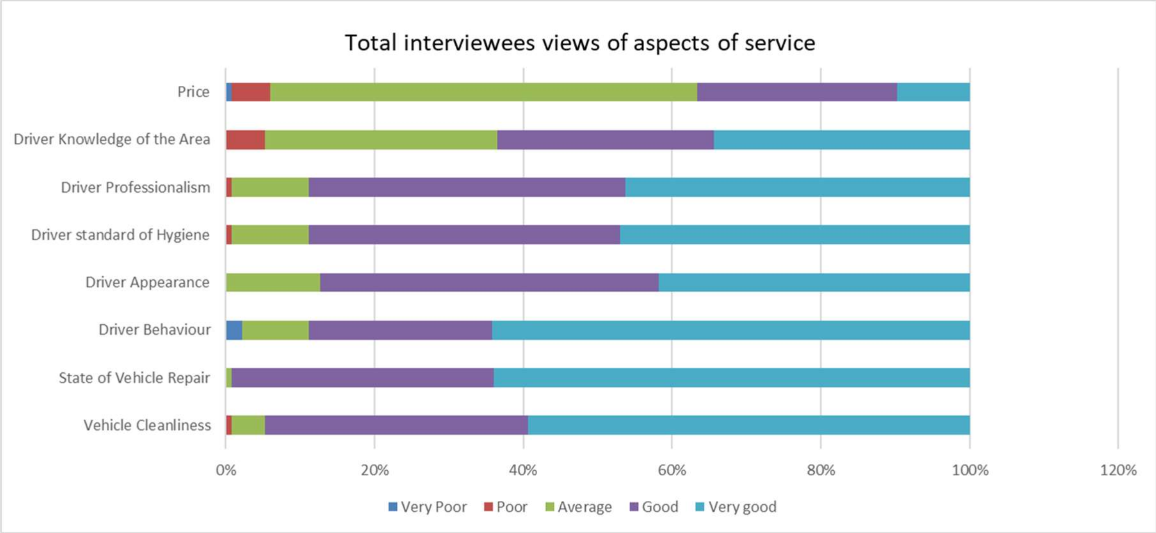
The largest negative change was for Victoria Street. This rank had been second with 17% of mentions overall in 2020. In 2025 it is 6th with just 4% mentioning it in Grimsby and none from Cleethorpes. However, 43% said they used it now (not much reduced from the equal split in 2020).

Some people gave general locations whilst others named places that were formerly ranks or could not be readily identified as rank locations. The most notable was the Diana Princess of Wales Hospital, where 17% said they were aware of a rank and used it in 2020 with 3% saying they were aware of it in 2025 but none of them claiming to use it.

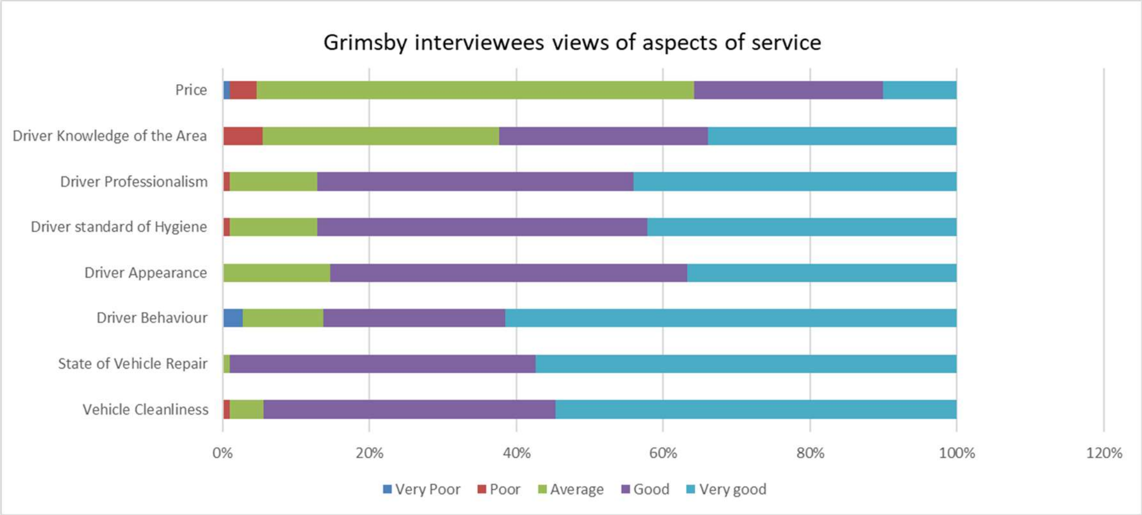
22 (eight in 2020) people said why they would not use ranks. 27% said it was because no taxis were available, 14% each said they preferred a regular driver or booking by phone. 9% each said either if the queue at the rank was long, the rank was too far away to walk to, preference for private hire, or concerns for safety at a rank. 5% each said either price or preference for home pick-ups. These responses were in Grimsby, with just a single response for the Cleethorpes sample, who said they preferred to have a regular driver. In 2020 75% said they used the bus instead, whilst the remaining 25% said using ranks was too expensive.

People were asked to rate various aspects of their recent trip 'in a taxi' (having been asked to focus on hackney carriages). 72% overall, 78% in Grimsby and 53% in Cleethorpes (half overall in 2020) of those interviewed provided a response.

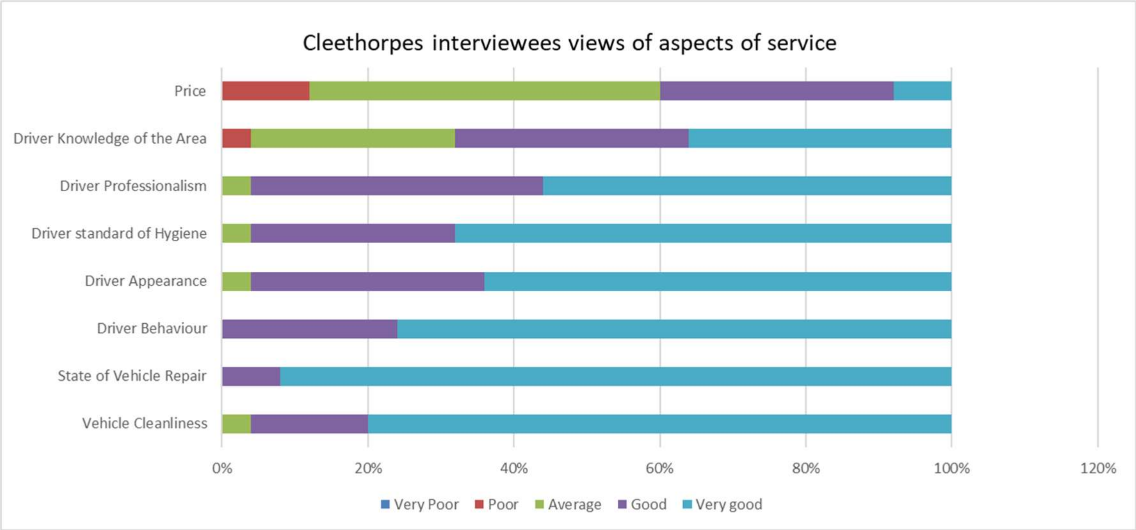
The graphs below demonstrate responses:



For the full set of interviewees, the top response is 'very good' apart from for price, where the top score is for 'average'. Overall, best very good responses are with reference to driver behaviour and state of vehicle repair, followed by vehicle cleanliness, driver standard of hygiene, driver professionalism, driver appearance and driver knowledge of the area. However, the worst 'very poor' score was for driver behaviour. This, and price, were the only 'very poor' scores although there had been no such scores at all in 2024.



The picture for Grimsby respondents was less favourable, with driver appearance and driver standard of hygiene both top scores for 'good' rather than 'very good'. Further, the 'very poor' score noted in the overall views came from the Grimsby interviewees.



Cleethorpes respondents felt their levels of service were much higher, with no very poor scores at all, and apart from price, always having the highest score being 'very good'.

As is often the case, price was the key item people were less appreciative of. Overall, just 10% (20% 2020) felt price was 'very good'. 27% (38%) said 'good', 57% (36%) average, 5% (6%) said poor, and, this time, 1% said 'very poor' (again a Grimsby respondent. However, even this aspect though clearly not scoring as highly, had no 'very poor' scores. However, Grimsby respondents were generally less concerned with price than those in Cleethorpes.

Overall, this suggests a very well appreciated licensed vehicle service in the North East Lincolnshire licensing area but again with differences between the service provided in the two main areas. There is some evidence that matters have become marginally worse since 2020.

A few comments were made about items people felt were poor (eight in total). Two said the driver complained about short distances when they had shopping, and one each said they were too expensive, the car was not clean (one Grimsby and one Cleethorpes respondent), the driver was rude, the driver went through a red light, and one driver did not seem to understand English.

In 2020, of the five comments, two made comments about 'foreign drivers' either having poor local knowledge or overcharging. One simply complained their driver had been rude. One felt drivers were sometimes scruffy and another said they had several experiences of drivers not helping people in wheelchairs. These were, however, all individual views and comments and not significant.

On the contrary, and in a very positive vein, in 2025, 20 comments were made regarding when people felt service was 'very good'. Top with seven persons stating it was 'the driver was very good'. Three said the car was clean, three said the service was excellent. Two said the driver was clean, helpful and friendly. One each said 'very reliable' (only Cleethorpes response), a company had high standards, they got the same driver every time, the driver knew the area well and that the driver texted them when arriving for their safety.

74% overall responded about what might encourage them to use hackney carriages or use them more often. The level was 80% for Grimsby and 55% for Cleethorpes. One person gave three answers with 49% overall giving two answers and the remaining 50% just one.

55% (42% 2020 and 35% 2016) of those responding to matters that might encourage them to use hackney carriages or use them more often said if they were more affordable. 20% (19%) said more hackney carriages they could phone for (16% in 2016). 14% (9%) said better drivers, 7% (3% in 2020 and 10% in 2016) more hackney carriages to hail or obtain at ranks. For Cleethorpes, there was a strong reaction that cheaper fares were the top matter that would increase their usage of hackney carriages (64%), with driver quality next (28%).

The issue of latent demand was considered. 16 (six in 2020) said they had given up waiting at a rank, with all the 2025 locations ranks (one of these in 2020 was not a rank location). This implies the rank-based latent demand value is 1.08 (was 1.025 in 2020) – a large increase.

74% (87% 2020) said they felt there were sufficient hackney carriages in the area overnight. This value was 93% in Cleethorpes but 69% in Grimsby.

84% (same as in 2020) of those responding said they did not themselves need, nor did they know anyone who needed an adapted licensed vehicle. This is a relatively low value compared to many other responses, suggesting relatively high need of such vehicles. It is also lower than the 89% quoted in 2016 suggesting increased need, but not since the 2020 survey. Most of those that said there was need had requirements for a WAV style (1%, 2% 2020), with 4% (12%) saying they knew someone who needed a WAV. 3% (2% 2020) said they needed some other adapted vehicle, not a WAV, with this time 8% saying they knew someone that needed a non-WAV adapted vehicle. These values differed by the separate locations.

People were asked if they had ever been unable to get either a private hire or hackney carriage vehicle which met their accessibility needs. Just one person said they had an issue, where the vehicle / driver would not carry them with their oxygen cylinders. Two said their needs were always met and all other respondents said they had no accessibility needs.

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

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.

However, it must be remembered that none of our consultation is statutory and for cost effective and fixed budget reasons we limit our attempts to contact people generally to a first attempt and reminder.

Despite chasing, no responses were received. Although disappointing, it could be taken to suggest there are no significant issues caused to stakeholders by the current operation of licensed vehicles in the area, as had there been any issues, people would have taken the opportunity to respond.

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. For this study, at least 245 invitations were issued. This covered hackney carriages drivers. In addition, private hire operators were provided with the link and asked to pass this on to their drivers for response. The survey was open from late May 2025 to the end of June 2025.

There were 91 responses, mainly electronic but with some posted back and some handed into licensing, scanned and returned. One response was a duplicate, the earliest of the two being removed. A check was made and no other potential duplicates were identified. There were ten responses who stopped part way through which could be a software issue or could have been a choice not to continue. All responses to that point were retained as valid.

Of the 90, 51% (45% for 2020, 58% in 2016) were hackney carriage, 4% said they drove both kinds of vehicle, 43% were private hire and one said they did not drive. This provides a hackney carriage response of 19%, private hire 11%, dual drivers 9% and overall 14%, higher than the 6%, and just marginally more than the 12% from the 2016 survey. This is a very good response level.

The level of responses from both parts of the trade means that relatively realistic comparisons can be made between the general statistics obtained from each part of the trade. Hackney carriage drivers had longer lengths of service – 14.1 years (as in 2020) compared to 12.6 (just under 10 2020) for private hire. The maximum hours were 36/35 respectively, longer than the 28 and 18 from 2020 surveys.

However, when comparing working weeks, the average days and overall spread of days' work for both parts of the trade was effectively the same for both parts of the trade at around 5.3 or 5.2 (was 4.7 in 2020) days each. For this survey, 21% (was 33%) of hackney carriage and 18% (28%) of private hire said they worked five days, 20% and 18% (33%) worked six, and 3% (13%) / 2% (6%) worked seven. This suggests the national trend of working away from less social times applies in North East Lincolnshire, although there has clearly been an increase towards mainly five and a half day working.

The quoted hours worked suggested overall longer hours for private hire in terms of the maximum worked (80 (67, 2020 and 80 2016) hours compared to 70 (60, 46)), and also on average hackney carriage worked more hours (43.6 (42) compared to 42.6 (35) hours), although to a lesser degree now.

With respect to days and periods worked, over the week 40% worked mornings, 40% afternoons, 13% early evenings and 7% overnight. In terms of days, 15% each worked Mondays to Wednesdays, 16% Thursdays and 18% Fridays, reducing to 12% Saturday and 8% Sunday. The lowest share worked Monday nights into Tuesday mornings.

The main issue affecting when people worked was family commitments 26% (29% 2020) followed by working busy times 18% (18%) , avoiding disruptive passengers 11% (18%), and simply 'preference' 19% (18%). 3% (9%) said their working hours were affected by them sharing a vehicle with an increased 10% (2%) avoiding heavy traffic. There were no clear 'other' responses that dominated the final 10% (5%) of those responding. Avoiding times of busy traffic saw increased share compared to reduced share for sharing vehicles and for avoiding disruptive passengers. Again, the strong impact of traffic congestion on licensed vehicle service is a national issue.

86% (88%) owned their own vehicle. Just 4% (3%) said someone else also drove their vehicle, also very similar to 2016. In 2025, 60% of other use was daytime (was 50%) with 20% (was 50%) weekends and 20% based on which vehicle a driver was given to operate.

72% (64% 2020 and 74% 2016) of the whole fleet accepted pre-bookings. 24% of hackney carriages and 28% of private hire however said they did not take pre-bookings. This is lower for hackney carriages than the 50% of 2020. One hackney carriage said they obtained entirely phone bookings but worked from the Airport, not saying if they took pre-bookings or not, but said they would also use the Grimsby station rank.

41% of hackney carriages took bookings through five different named operators, two of which were not quoted by private hire respondents. The top company was quoted by 24% of hackney carriages responding, next gained 9%, next 4% and then two companies with 2% of the respondents each.

For private hire, 37% of private hire respondents named the same top company as the hackney carriage respondents, 5% named the second company also named by hackney carriages and 8% named the company that obtained 4% of hackney carriage respondents. There were two companies who were quoted by one private hire respondent each which were not mentioned by the hackney carriages. This does suggest the two fleets are relatively closely linked in terms of operation.

28% of private hire said they did not accept pre-bookings. However, one said they got all their work from telephone, another said 90% from an app and two others said all their work came from apps. The others are presumed to be niche sole operators.

Although 12 (14) different names were given for rank locations serviced, in reality these were just seven (eight) rank locations. There were effectively two (five in 2020) different names given to the Station rank in Grimsby. In total these added up to 49% (35%) of all rank mentions (this time, Grimsby Station and “Town Rank”). The next largest site quoted, with 14% (19%), was Cleethorpes High Street. Victoria Street was not mentioned at all (had been 15% albeit in different guises). The two ranks that make up the Cleethorpes Station gained just 2% of mentions (in 2020 they gained 6% of votes), nor was Market St Cleethorpes mentioned this time (which again had gained 6%)

Bethlehem Street Grimsby gained a similar 6% in both 2025 and 2020. Garibaldi Street gained 10%, compared to 3% of the total in 2020. This time St Peters Avenue in Cleethorpes gained one mention, 1% of the total. Osborne Street gained 2% with one mention of a taxi company base named as a rank serviced, that respondent said they got half their work from ranks and half from an operator.

The key reduction this time is that none now quote Victoria Street.

39 of all respondents mentioned issues regarding rank operations. 46% of these related to the issue of Cleethorpes High Street or the lack of appropriate ranks for the night life there. 13% said there were not enough spaces in general and 3% that there were too many vehicles. 5% said Victoria Street West was now too far from shops; 5% that ranks were parked in and 5% that the station rank was full. One mentioned issue with setting down people with mobility issues but this was mainly feeling they were unable to leave their vehicle to complete their job by taking the passenger to their destination; and another said only the station was in the right location. This was a lot more critical a response than in previous surveys, but also much more specific.

Many multiple responses were given in regard to how people obtained fares. For the full sample and all responses, rank was top with 32% (22% 2020), app with 28% (22%), phone with 18% (25%), school contracts 14% (was 9%) and hailing 2% (16%). In detail, there were just two hackney carriages who only obtained work from ranks. Three more saw 99% rank, 1% hail. 16 had at least 50% of their work from ranks, with a mix of other contributing factors. One hackney carriage got all their work from an app, and another (already mentioned) from phone but servicing the Airport. One hackney carriage got 90% of work from school contracts, and 5% each from hailing and ranks. Eight others got between 10% and 50% of their work from school contracts. 15 got between 5% and 40% only from ranks. This demonstrates there is insufficient work at the ranks to support the current hackney carriage operation on their own.

There were seven private hire 100% app-based but just four 100% phone based. Just one was 100% school contract with eight others with between 5% and 90% of work from school contracts.

97% felt there were enough hackney carriages in North East Lincolnshire at the moment, the same level as in 2020.

88% (94%, 2020 and 97% 2016) of those responding felt the number of hackney carriages should continue to be limited. This included all but two (one) private hire who responded.

42 gave comment in reference to how having a limit benefitted the public but only a few were specific. Specifics included maintaining vehicle standards, people knowing drivers, keeping congestion reduced, keeping fares down, and providing quality not quantity.

Other comments mainly reiterated what had already been said, particularly in there being too many vehicles, not enough work and need for a better rank provision in Cleethorpes, together with a closer central area rank.

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.

	2025	2020	2016	2013	2009
Average passenger delay	0.15	0.1	0.13	0.16	0.28
% passengers in hours with average queue over a minute	10.16	21.57	2	3.03	0.08
% passengers in off peak hours with any delay	2.92	2.58	14	3	1
Seasonality factor	1	1.2	1	1	1
Peak factor	0.5	0.5	0.5	1	1
Latent Demand factor	1.08	1.05	1.028	1.087	1.16
Overall ISUD factor	2.4	3.5	1.92	2	0.03

For 2025, the overall ISUD index is reduced from that identified in 2020, although still higher than all other values other than the 2020 one. Average passenger delay has increased from 2020, but the proportion of passengers in hours with average passenger delay over a minute has halved. The proportion in off peak hours has increased marginally, as has the latent demand factor. However, none of the values obtained are anywhere near the level of 80 that signifies the observed unmet demand is significant.

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

Further discussion is provided in the synthesis section below.

It should be noted that this section covers unmet demand for the total hackney carriage vehicle fleet and its significance. The issue of unmet demand for WAV style vehicles is a different element whose review occurs in the synthesis chapter below, drawing on the various elements of the survey presented in earlier chapters.

8 Summary, synthesis and study conclusions

This Unmet Demand Survey on behalf of North East Lincolnshire Council has been undertaken following the guidance of the BPG and other recent case history regarding unmet demand and its significance. This summary draws together the salient points from the preceding chapters and then compares and contrasts the different elements to provide a comprehensive picture of current operations and the impact of the present restriction on hackney carriage vehicle numbers. This moves forward to conclusions for the current review, followed by recommendations in the following Chapter.

Background and context

This latest snapshot review of the impact of retaining a limit on the number of hackney carriage vehicles in the North East Lincolnshire licensing area was carried out between March and August 2025. On street pedestrian views were obtained on a Tuesday and Wednesday in mid to late April 2025. The rank observations were at the end of March. The driver survey ran through May and June 2025. Key stakeholders were approached but none had any cause to respond.

NEL has good reference to licensed vehicles within its current Local Transport Plan policy document, presently based on the 2016-2032 vision with a flexible delivery plan usually refreshed annually. A key aim remains to ensure an appropriate supply of licensed vehicles with focus on meeting needs of those with mobility and other disabilities. Although it is clear those in the policy sections of the Council are committed to developing services, their link to the Licensing section still appears to need strengthening. Further, this report could provide better inputs to the LTP monitoring including actual usage of licensed vehicles.

Current population for 2021 from the census was 156,966 with 20% of those 16 or over under the age of 30, 38% between 31 and 55 and 42% over 55. 49% of this 16+ population are male. These proportions are the same as in 2020.

The NEL limit on hackney carriage vehicle numbers was removed between 2005 and 2009. When restored, the limit was set at 235 but reduced to a target of 220 in 2012. Neither the 2016 nor 2020 surveys found any unmet demand that was significant and the limit remains at 220 hackney carriage vehicles.

Hackney carriage vehicle numbers saw a slight reduction resulting from the pandemic, but impact on private hire vehicles and drivers was much more significant with more recent return for both private hire vehicles and drivers. The most notable marked change since the last survey is a continued reduction of the number of WAV in the hackney carriage fleet with the current level being the lowest since the initial policy change of the early 2000's that did see significant increase to a peak of nearly half the fleet.

As there are no private hire WAV the overall fleet WAV level is now 6% (was 14% in 2020) putting North East Lincolnshire 174th out of 267 English licensing authorities. When considering just hackney carriages, and just mixed fleets, the 2024 DfT statistic was that 22% were WAV style; the North East Lincolnshire value of 16% is therefore now below the English mixed fleet average – but also a big change since the previous value of 33% in 2020. The ranking is 90th out of 199 mixed vehicle hackney carriage fleet WAV percentages. It also implies that one in six of the fleet will now be WAV whereas at peak it was nearly every other vehicle.

The rank observations in 2025 found 73% of vehicles seen at ranks were hackney carriages, marginally reduced from the 77% of 2020. Private hire share was up from 3% to 6%, and private car shares up marginally from 17% to 19%. Ranks impacted most by private cars were Bethlehem Street, Grimsby (53% share was private cars) and Freeman Street Market (62%). Other high shares of cars at ranks related to less used ranks, particularly Victoria Street West.

For this survey, the share of vehicles servicing the Grimsby station rank increased to 61% of the total (from 55%). High Street Cleethorpes saw a similar level to 2020 at 29%. 4% were observed at an informal location in George Street with Freeman Street Market seeing 3.5% (slightly increased share). Victoria Street West saw very little usage this time – in 2020 it saw 7% of the total hackney carriage movements.

The net level of estimated passengers was down 20% on that in 2020, which appears to have been a recent high in terms of passenger usage (up from 2016). Remarkably the actual number of passengers estimated for a typical week at Grimsby Station was very similar to the levels estimated for 2020 and 2016 (4,795 in 2025). Its share of the total passengers was 71%. With Cleethorpes night demand taking 23%, George Street informal rank in Grimsby 2.8%, Freeman Street Market 1.8%, Bethlehem Street Grimsby 0.7% and Victoria Street West 0.7%. No other ranks saw passengers at all.

However, comparison of 2025 and 2020 passenger numbers by day and hour suggested a very similar profile remains. Demand rises from Thursday through Friday to Saturday. Current flows are generally lower than 2020 although the Friday peak and late Saturday afternoon flows were higher in 2025. Overall the flow profile is marginally peakier in 2025.

Rail passenger levels at Grimsby station remain lower than the peak year of 2018/2019 but are still about 11% less than at the time of the 2020 survey. Comparison of the estimated weekly number of rail passengers arriving with the estimated weekly number leaving by hackney carriage (3,858 and 4,795 for 2025) confirms the rank is much more than just servicing the station.

It was also confirmed in the 2025 observations that the small level of usage of Bethlehem Street is made up of three parts:

- Main usage appears to be waiting to move away to service calls
- Secondary usage is feeding the station rank
- Third highest usage sees people taking vehicles from this rank

The rank was regularly impacted by overspill of private vehicles from the legitimate parking spaces ahead of the rank into the rank itself.

It was also observed that the way demand is met in Cleethorpes has changed significantly. The spaces in Market Street, and to a lesser extent those in High Street, saw high levels of abuse by private vehicles. An informal rank process has become normal with vehicles picking up on the opposite side of High Street from the legal rank (and nearer the Sea Front and bars), feeding into this from Osborne Street and when very busy from Market Street. This means vehicles can leave heading away from the sea front more readily.

St Peter's Road Cleethorpes did not seem to get as much private vehicle abuse but also did not see any hackney carriage passengers during this survey. If it is to be kept, it needs to be enforced and marketed. The same was true for Grant Street and its feeder near Cleethorpes Station. Market Street was never really available for hackney carriages and is now unlikely to be used, particularly if the actual operation can be formalised.

Sea Road saw no hackney carriage activity and the only licensed vehicle activity related to private hire connections to setting down coach services, usually late at night.

Both ranks in Victoria Street in Grimsby can be removed as redundant. This is also true for Osborne Street. St Mary's Gate, Pygott and Crone, appears to be useful but mainly for vehicles awaiting bookings and is worthy of retention.

Release of some spaces from unused ranks could be utilised to increase the provision at Bethlehem Street to take the whole bay there; whilst release of spaces in Cleethorpes should go hand in hand with formalisation of the successful current arrangement.

In 2025 our sample vehicle observations saw 47% of the fleet, compared to 33% in 2020 (although that latter value was only for the Saturday). Friday afternoon and Saturday night saw most vehicles in terms of different vehicles from the overall fleet.

The level of observed WAV in the rank observations was 13% (29% 2020), but still marginally less than the proportion in the fleet.

Observed usage by people in wheel chairs was, at five, lower than the 12 from 2020 or the 10 in 2016. The level of people with other disabilities observed was also lower than in 2016. Most were still at the station rank in Grimsby, as in 2020.

Delay to passengers in 2025 was reduced, with 8% of hours seeing delay to passenger departures (18% in 2020), and with a reduced level of people waiting in hours when average passenger delay was a minute or more (2% now, 6% in 2020). The level of passengers observed walking away from ranks was reduced (from 144 to 96).

On street public views

A robust and generally census consistent sample of 185 (200 2020) interviews in the streets of Grimsby and Cleethorpes was obtained.

65% (43% 2020) in Grimsby and 35% (30%) in Cleethorpes said they had used a local licensed vehicle in the last three months. Total estimated monthly licensed vehicle trips based on quoted frequencies were 2.0 (1.4) per month. These ranged from 0.4 (0.5) in Cleethorpes to 2.6 (1.7) in Grimsby.

Both the level of those not remembering when they last used a hackney carriage and those not remembering seeing on in the area continued to significantly reduce, with none stating the latter in 2025 compared to 3% in 2020 and 15% in 2016.

With quoted frequencies, the estimate of hackney carriage trips per month was 0.3 (0.1) for Cleethorpes and 1.1 (1.3) for Grimsby, 0.9 (1.0) overall. These figures suggest 42% (72%) of licensed vehicle trips in Grimsby are by hackney carriage but a much higher 73% (was 27%) in Cleethorpes.

In terms of how people got licensed vehicles, the levels of quoted rank usage at 37% overall remained similar to 2020. Quoted obtaining by app doubled from 3% to 6%. There was a change in mix – in 2025 44% only telephoned (was 47%), 23% (18%) only used ranks, 2% (3%) mainly used apps with 20% (was 30%) using a mix of rank and telephone.

Results from identifying companies phoned to get vehicles suggest competition exists in the area but that people remain highly satisfied with companies they currently use. The top five companies now were the same as those in 2020 with the top two having increased their shares. Five apps were quoted with the largest used being related to the largest company. This was a significant increase since 2020 when only one app was named. No mention of national apps was made.

With respect to ranks, 48% (45%) named a location and said they used it. Grimsby Station saw 59% (44%) of mentions, increased from the value of 36% in 2016. Cleethorpes (Market Place) was second with 10% of mentions. No mention was made of Victoria Street West, but 8% overall quoted 'Riverhead' (approximately the George Street informal location).

The main reason people said they did not use ranks, with 27% of mentions, was because no taxis were expected to be available there. The next highest reasons, both with 14% were that people preferred to obtain a regular driver or to book by phone.

Views about licensed vehicle services suggest a very well appreciated licensed vehicle service in the area, though perhaps a marginal worsening in views since 2020. However, there were five further detail comments on issues but 20 further detail comments on very good service, with the top view being that 'the driver was very good'.

As is often the case around the country the main item that might increase hackney carriage usage was reduced prices. 55% now (42% 2020, 35% 2016) said 'if they were more affordable'.

74% (was 87% 2020) across the area felt there were enough hackney carriages at night. The latent demand factor was 1.08, increased from 2020.

Response about need for adapted vehicles suggested potential need in NEL might be higher than in other places. This focussed on need for a WAV rather than any non-WAV provision. However, the overall level was the same as in 2020.

When questioned about if people had been unable to get vehicles that met their accessibility needs, only one person quoted an issue.

Key stakeholder views

No key stakeholders felt need to make any response to this survey. This is a national norm.

Trade views

Response to this survey to all licensed drivers was 14% (6% 2022), very good, and even higher than the 12% from 2016.

The response was 51% (45%) hackney carriage drivers. Hackney carriage experience levels remained marginally higher than private hire.

Days worked were on average 5.3, up from the 4.7 of 2020. Total weekly hours were marginally higher, with a larger increase for private hire bringing overall hours very similar (43.6 hackney carriage drivers and 42.6 private hire drivers).

Working was now mainly impacted by family commitments, followed by trying to work busy times. The level avoiding disruptive passengers at 11% was reduced from the 18% of 2020.

86% (88%) owned their own vehicle and 72% (64%) accepted pre-bookings, although still reduced from the 74% of 2016. 41% of hackney carriage respondents took bookings from five different operators, two of which appeared to be hackney carriage only.

In terms of ranks, Grimsby Station was most popular followed by High Street, Cleethorpes (as in 2020). Victoria Street was not mentioned, apart from one driver telling us it was too far away from the shops.

With reference to rank issues, the issue of night demand and provision for it in Cleethorpes was mentioned by 46% of the 39 respondents giving rank issues.

With respect to obtaining fares, rank was now top with 32% (was 22%), app with 28% (22%), phone 18% (25%), school contracts 14% (9%) and hailing 2% (16%). One hackney carriage obtained 90% of their work through school contracts. Only two solely worked ranks. One hackney carriage said all their work was from an app whilst another got phone bookings but all from the Airport. Nine other hackney carriages got between 10% and 90% of their work from school contracts.

Seven private hire were fully app-based with four fully phone-based. One was purely school contract-based with eight others gaining 5% to 90% of work from school contracts.

88% (94%), including all but two of the private hire that expressed a response, supported retention of the limit. 97% (as in 2020) felt there were enough hackney carriage vehicles.

Formal evaluation of significance of unmet demand

The overall ISUD index level has reduced from 3.5 in 2020 to 2.4 now, and remains a long way from the level that would be counted as significant for the purposes of Section 16 of the 1985 Transport Act. Average passenger delay and the proportion of passenger travelling in off peak hours with any delay have both marginally increased, as has latent demand. The main change in a positive sense is a halving of the proportion of passengers travelling in hours when there is an average passenger delay of over a minute.

Synthesis

Overall demand for hackney carriages in the North East Lincolnshire licensing area is now 20% lower than it was in 2020. However, the overall pattern of demand remains similar with demand growing from Thursday through to Friday and Saturday. Focus of work on the Grimsby Station rank is increasing with many vehicles finding bookings and contract work increasingly important. The pressure on making a living appears to have led to a significant reduction in the level of hackney carriage WAV style vehicles which have seen the largest drop. There are in the order of 16 hackney carriage plates spare within the limited number of 220.

The most important rank to drivers and passengers alike remains the Grimsby station rank. Even more vehicles are servicing that location now than in either 2020 or 2016, particularly in the daytime. This is despite the actual passenger demand remaining almost exactly the same over the last three surveys.

Usage of the local hackney carriage fleet by those needing WAV style vehicles remains at a good level, albeit reduced from 2020. The current list of those providing a WAV service and its improved sharing has been welcomed by those needing this service. However, the reduction in WAV numbers is a major concern, with just one in six hackney carriages now being WAV style, and the area dropping down the league tables in terms of share of the fleet compared to other English licensing authorities. This appears to arise from significant usage being made of the 2013 policy allowing WAV style vehicles to revert to saloon.

The reduction in numbers seen using WAV may reflect the lower level of availability, now 1 in 6 rather than the 1 in 2 as at the height of their provision. Further, the on-street interviews suggest continued increase in need for this style of vehicle appears to exist. Also, the level of need in the local population, as identified in the 2021 census, also suggests potentially higher level of need for WAV and adapted licensed vehicles than in either the remainder of the Yorkshire and The Humber area or England. Development of an Integrated Transport Plan for the licensed vehicle service, as per the latest Best Practice Guidance, might be of value in this respect.

People continue to appreciate the service provided by both private hire and hackney carriage in the area. Good service has been rewarded by more usage, and the bringing in of apps on the private hire side, and other marketing on the hackney carriage side, has benefitted the trade. In 2025 there are now five different apps apparent and these remain locally focussed, a significant achievement. The lack of out of town vehicles is testament to the good service levels provided by the local fleet.

There remains a difference between Grimsby and Cleethorpes with higher hackney carriage usage in the former but more night activity (and more hackney carriage based) in the latter. There is a major concern about how the Cleethorpes rank provision matches the actual current operation.

The licensed vehicle industry continues to support the limit policy strongly across the board.

There is clearly opportunity to reduce redundant rank numbers, but the Bethlehem Street rank needs to see the full bay available to hackney carriages which could be obviated by transfer of the redundant spaces to this location. A good rank space nearer the Town Centre (near the corner of George Street and Victoria Street) is also necessary.

Conclusions

The current policy limiting hackney carriage vehicle numbers appears to provide good stability to the whole trade and is well-supported. There is very clear evidence of public benefit arising from this, and other present policies. There is a major concern and need to resolve the fast dropping numbers of WAV vehicles. Whilst it is accepted that demand for them is relatively low, their significance to those that use them is very high. It is unfortunate that the pressure on the industry to reduce costs is not helping in this respect.

9 Recommendations

On the basis of the evidence gathered in this unmet demand survey for North East Lincolnshire, 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 NEL licensing area. Given the strong counter evidence of public benefit and trade stability, the limit should continue to be retained, and can be retained at the present level.

Maintenance of the WAV vehicle list is providing significant accessibility benefits and must remain a priority. However, the significant drop in their numbers, such that only one in six of the fleet are now this style, needs to be stopped and if possible reversed. This potentially needs the revocation of the 2013 policy change which has seen more take-up than perhaps intended, to the disbenefit of those travelling and needing such vehicles. Other evidence backs relatively high or increased need for these style vehicles, and development of an Integrated Transport Plan for the licensed vehicle service would be of benefit, particularly if tied in with the local overall transport accessibility policy.

There are several plates not on issue that could be released and conditioned to be permanent WAV.

Ranks not needed by trade nor frequented by passengers should be removed – including both Victoria Street ranks, Osborne Street and Sea Road, possibly shifting some spaces to other smaller sites alongside their remarking (principally to Bethlehem Street and to a new site in Grimsby Town Centre). The ranks in St Peter’s Avenue and Grant Street in Cleethorpes need remarking, marketing to the public and enforcement.

Plans should be put in place to review the demand survey database of information with fresh rank observations undertaken preferably no later than March 2030, or preferably earlier, particularly if new ranks are introduced and other ranks remarked.

The licensing section should be encouraged to share the detail of this Report with those in the policy section of the Council and seek closer liaison in the future in terms of inputs to the regular annual update of the LTP.