CABINET
Agenda

Date	Monday 26 July 2021
Time	6.00 pm
Venue	Council Chamber, Civic Centre, Oldham, West Street, Oldham, OL1 1NL
Notes	1. DECLARATIONS OF INTEREST- If a Member requires any advice on any item involving a possible declaration of interest which could affect his/her ability to speak and/or vote he/she is advised to contact Paul Entwistle or Liz Drogan in advance of the meeting. 2. CONTACT OFFICER for this Agenda is Liz Drogan Tel. 0161 770 5151 or email elizabeth.drogan@oldham.gov.uk 3. PUBLIC QUESTIONS – Any member of the public wishing to ask a question at the above meeting can do so only if a written copy of the question is submitted to the Contact officer by 12 Noon on Wednesday, 21 July 2021. MEMBERSHIP OF THE CABINET IS AS FOLLOWS: Councillors Akhtar, Chadderton, Chauhan, Jabbar, Moores, Mushtaq, Roberts, Shah and Stretton

Item No

11 GM Clean Air Final Plan (Pages 1 - 998)

Report to follow

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Report to CABINET

GM Clean Air Final Plan

Portfolio Holder: Cllr A Jabbar, Deputy Leader and Cabinet Member for Finance and Corporate Resources.

Officer Contact: Deputy Chief Executive

Report Author: Carol Brown, Director of Environmental Management

Ext. 4424

26 July 2021

Reason for Decision

To set out the proposed Greater Manchester Final Clean Air Plan and policy following a review of all of the information gathered through the GM CAP consultation and wider data, evidence and modelling work which is to be agreed by the ten Greater Manchester local authorities. To seek approval of the proposed plan as set out below.

Executive Summary

1.1 In Greater Manchester, the ten GM local authorities, the Greater Manchester Combined Authority (GMCA) and Transport for Greater Manchester (TfGM), collectively referred to as "GM", have worked together to develop a Clean Air Plan to tackle NO2 Exceedances at the Roadside, referred to as GM CAP.

1.2 This report sets out the progress made on the GM Clean Air Plan, the report is supported by the following documents which are proposed and subject to approval by the ten GM local authorities:

- Appendix 1 – GM CAP Policy following Consultation
- Appendix 2 – GM CAP Equality Impact Assessment following Consultation
- Appendix 3 – AECOM Consultation Report1

[1] AECOM – the independent agency who managed and analysed the consultation responses

- Appendix 4 – Response to the Consultation
- Appendix 5 – Impacts of COVID-19 Report
- Appendix 6 – Air Quality Modelling Report following Consultation and with COVID-19 impacts
- Appendix 7 – Economic Implications of CAP following Consultation and with COVID-19 impacts
- Appendix 8 – Update on Other Cities' Clean Air Plans
- Appendix 9 – Compliance with the Secretary of State's Direction
- Appendix 10 – Clean Air Zone, ANPR and Signage Locations

1.3 The proposed final GM Clean Air Plan sets out final proposals for:

- the boundary, hours of operation, management of the scheme, discounts, exemptions and daily charges of a Clean Air Zone;
- the amount of supporting funds for each vehicle type; and
- other supporting measures.

1.4 The proposed final GM CAP policy, which is summarised in this report, is attached at Appendix 1. In relation to the Clean Air Zone (CAZ), it covers the operation and management of the GM CAZ. The anticipated implementation date of the charging CAZ is Monday 30 May 20222 when the charges will apply to non-compliant buses, HGVs, and Hackney Carriages and Private Hire Vehicles licensed outside of Greater Manchester. Non-compliant LGVs, minibuses and coaches, and GM-licensed Hackney Carriages and Private Hire Vehicles would be subject to the charges from 1 June 2023 when a temporary exemption expires.

1.5 The boundary of the CAZ will cover the whole of Greater Manchester3, excluding the strategic Road Network (SRN) which is managed by Highways England. The daily charges remain the same as at consultation. Lower charges would mean more people are likely to pay the charge, rather than upgrade their vehicle, which would impose costs onto businesses without delivering air quality benefits. Improved support to businesses is proposed to provide a better mitigation than lower charges. One such mitigation is extended temporary exemptions, which include all LGVs and minibuses, GM-licensed hackney carriages and Private Hire Vehicles (PHVs) and all coaches. These exemptions are now proposed to be in place until 31 May 2023. Providing a full 12-month exemption, gives those with non-compliant vehicles more time to upgrade, alongside support funds to assist businesses, individuals and organisations to upgrade their non-compliant vehicles.

[2] subject to joint GM and JAQU agreement on overall 'readiness', including that the Central Charging Portal and national Vehicle Checker is GM ready.

[3] It is now proposed to include, in addition to the roads consulted on, the A575 and A580 at Worsley and a further consultation is proposed to take place on that.

1.6 Feedback from the consultation and consideration of the impact of COVID-19 on Greater Manchester has been used to better understand the requirements of those businesses, individuals and organisations who most need the support to upgrade. It is therefore proposed to amend the support funds from those consulted upon. The final proposed policy increases the funding per vehicle for Private Hire Vehicles, coaches, HGVs and vans whilst remaining the same for other vehicle types. There are also more options for replacement and retrofit for hackney carriages, PHVs, minibuses and vans.

1.7 The proposed final GM Clean Air Plan does not include a Hardship Fund. Although feedback from the consultation and the impact of COVID-19 research found that further support was required for GM businesses, Government Ministers do not agree that a Hardship Fund is the best way to mitigate the impact of uncertainty due to the pandemic. Ministers cite other government schemes being available to address wider business impacts. However, Government have confirmed that they wish to ensure that Clean Air Funds can be adapted if necessary; and, that they will continue to work with GM to understand the situation, including the funding position, if the impacts prove to be more severe than forecast.

1.8 The proposed final GM Clean Air Plan also explains the next steps with the taxi charging infrastructure and the Try Before You Buy Hackney Carriage scheme. The changes within these schemes have been determined by the funding allocated to GM from Government as well as feedback from the consultation.

1.9 This report summarises the Air Quality Modelling of the final CAP package, taking into account the impacts of COVID-19, which concludes that the proposed final Plan will achieve compliance with the legal limits for Nitrogen Dioxide within Greater Manchester in the shortest possible time and by 2024 at the latest as required by the Ministerial Direction.

1.10 The report also sets out:

- the key findings of the consultation.
- highlights from the proposed GM Response to the consultation Report.
- the findings from the Impact of COVID-19 research, which looks at the potential impact of the COVID-19 pandemic and the potential economic and behavioural changes that may occur.
- the key findings of the GM CAP Equality Impact Assessment following consultation.
- the latest position on Government funding, an update on the bus retrofit fund and progress on the GM Clean Air Zone, including signage and governance.

1.11 Making the charging scheme is desirable to facilitate the achievement of the local transport policies of the 10 GM local authorities and the GMCA, in particular policy 8 of the 2040 Transport strategy. The GM CAP has been developed, in-line with the 2040 Transport Strategy principles and vision. The 2040 Strategy provides a long-term vision for transport provision in Greater Manchester, along with specific principles and targets for achieving that vision, to ensure that available resources are used to contribute to achieving the region's strategic transport objectives.

Recommendations

The Cabinet is requested to:

1. Note the progress of the Greater Manchester Clean Air Plan;

2. Note the progress in the distribution of Bus Retrofit funding;

3. Note Ministers' agreement to include the sections of the A628/A57 in Tameside which form part of the Strategic Road Network within the Greater Manchester's Clean Air Zone (CAZ) and their request for Tameside MBC, TfGM and Highways England to establish the most appropriate solution for the charging mechanism to be applied on this section of the Strategic Road Network (SRN);

4. Approve the GM Clean Air Plan Policy, at Appendix 1 noting that the policy outlines the boundary, discounts, exemptions, daily charges of the Clean Air Zone as well as the financial support packages offered towards upgrading to a compliant vehicle, including the eligibility criteria to be applied.

5. Agree the Equalities Impact Assessment, as set out at Appendix 2;

6. Agree the AECOM Consultation Report, as set out at Appendix 3;

7. Agree the proposed Response to the Consultation at Appendix 4 which has been prepared by TfGM on behalf of the ten GM local authorities;

8. Agree the Impacts of COVID-19 Report, as set out at Appendix 5;

9. Agree the Modelling report of the final CAP package, as set out at Appendix 6, and in particular that the modelling outputs of the final plan scheme show the achievement of compliance with the legal limits for Nitrogen Dioxide in the shortest possible time and by 2024 at the latest as required by the Ministerial Direction;

10. Agree the economic implications of the CAP Report, as set out at Appendix 7;

11. Note the update on the GM Minimum Licensing Standards, set out in section 3.1, and in particular that licensing conditions will not be used to support delivery of the GM Clean Air Plan;

12. Approve a 6-week public consultation on the inclusion of motorhomes classified as MSP1 in the GM Clean Air Zone and on the inclusion of the A575 and A580 at Worsley commencing on 1 September 2021 and delegate authority to the Cabinet

Member for Finance and Corporate Resources and the Deputy Chief Executive to approve the consultation materials;

13. Note that the GM Clean Air Charging Authorities Committee has the authority to make the Charging Scheme Order which establishes the GM Charging Scheme in line with the agreed GM Clean Air Plan Policy;

14. Note that the GM Charging Authorities Committee has the authority to vary the Charging Scheme Order if this is established as the most appropriate charging mechanism to be applied on sections of the A628/A57 part of the Strategic Road Network (SRN) in Tameside;

15. Note that the Air Quality Administration Committee has the authority to agree the final form of the Operational Agreement for the Central Clean Air Service, and to authorise the making of the Agreement, on behalf of the ten GM local authorities;

16. Note that the Air Quality Administration Committee has the authority to:
    a. establish and distribute the funds set out in the agreed GM Clean Air Plan policy;
    b. approve the assessment mechanism agreed with JAQU to ensure that Clean Air Funds can be adapted if necessary;
    c. keep the use of the funds under review and to determine any changes in the amounts allocated to each and their use and
    d. Monitor and evaluate the joint local charging scheme.

17. Approve the reallocation of funding from the Try Before You Buy scheme to provide additional electric vehicle charging points dedicated for use by taxis;

18. Delegate to the GM Charging Authorities Committee the authority to determine the outcome of the consultation on both the inclusion of motorhomes classified as MSP1 within the scope of Clean Air Zone charges and on the inclusion in the GM Clean Air Zone of the A575 and A580 at Worsley following the conclusion of that consultation;

19. Agree the Clean Air Zone ANPR and signage locations, as set out at Appendix 10;

20. Agree a delegation to Deputy Chief Executive and the Member for Finance and Corporate Resources to approve the submission of the Interim Full Business Case if required and the Member for Finance and Corporate Resources and Deputy Chief Executive, the Full Business Case (FBC) to the Government's Joint Air Quality Unit to support the GM Clean Air Plan and any supplementary information to that Unit .

Equalities Implications: Equality Impact Assessment was completed for consultation and can be found at here. This will be updated and published with the final plan.

Climate Change Impact Assessment and Mitigation Measures: The GM CAP is a place-based solution to tackle roadside NO_2 which will have a positive impact on carbon.

Risk management: Initial risk register set out in Clean Air Plan OBC (March 2019)

Legal Considerations: legal considerations are set out in Appendix 9 of the report.

Financial Consequences – Revenue: Initial Financial Case set out in Clean Air Plan OBC (March 2019), with all development and delivery costs to be covered by central Government

Financial Consequences – Capital: Initial Financial Case set out in Clean Air Plan OBC (March 2019), with all development and delivery costs to be covered by central Government

Number of attachments to the report: 10 (ten)

Comments/recommendations from Overview & Scrutiny Committee: n/a.

BACKGROUND PAPERS:

- 31 January 2021, report to GMCA: GM Clean Air Plan: Consultation
- 31 July 2020, report to GMCA: Clean Air Plan Update
- 29 May 2020, report to GMCA: Clean Air Plan Update
- 31 January 2020, report to GMCA: Clean Air Plan Update
- 26 Jul 2019, report to GMCA: Clean Air Plan Update
- 1 March 2019, report to GMCA: Greater Manchester's Clean Air Plan – Tackling Nitrogen Dioxide Exceedances at the Roadside - Outline Business Case
- 11 January 2019, report to GMCA/AGMA: Clean Air Update
- 14 December 2018, report to GMCA: Clean Air Update
- 30 November 2018, report to GMCA: Clean Air Plan Update
- 26 October 2018, report to GMCA: GM Clean Air Plan Update on Local Air Quality Monitoring
- 15 November 2018, report to HPEOS Committee: Clean Air Update
- 16 August 2018, report to HPEOS Committee: GM Clean Air Plan Update
- UK plan for tackling roadside nitrogen dioxide concentrations, Defra and DfT, July 2017

GM Clean Air Final Plan

1 Background

1.1 To set out the proposed Greater Manchester Final Clean Air Plan and policy following a review of all of the information gathered through the GM CAP consultation and wider data, evidence and modelling work which is to be agreed by the ten Greater Manchester local authorities.

2 INTRODUCTION

2.1 Poor air quality is the largest environmental risk to the public's health. Taking action to improve air quality is crucial to improve population health.

2.2 Whilst air quality has been generally improving over time, particular pollutants remain a serious concern in many urban areas. These include oxides of nitrogen (NOx) and in particular nitrogen dioxide (NO_2), and particulate matter (PM).

2.3 In Greater Manchester, road transport is responsible for approximately 80% of NO_2 concentrations at roadside, of which diesel vehicles are the largest source.

2.4 Long-term exposure to elevated levels of particulate matter (PM2.5, PM10) and NO_2 may contribute to the development of cardiovascular or respiratory disease and may reduce life expectancy[4]. The youngest, the oldest, those living in areas of deprivation, and those with existing respiratory or cardiovascular disease are most likely to develop symptoms due to exposure to air pollution[5,6].

2.5 Public Health England estimate the health and social care costs across England due to exposure to air pollution will be £5.3 billion by 2035 for diseases where there is a strong association with air pollution, or £18.6 billion for all diseases with evidence of an association with air pollution[7].

[4] Air Quality – A Briefing for Directors of Public Health (2017), https://www.local.gov.uk/air-quality-briefing-directors-public-health
[5] Air Quality – A Briefing for Directors of Public Health (2017), https://www.local.gov.uk/air-quality-briefing-directors-public-health
[6] RCP and RCPCH London, Every breath we take lifelong impact of air pollution (2016), https://www.rcplondon.ac.uk/projects/outputs/every-breath-we-take-lifelong-impact-air-pollution
[7] https://www.gov.uk/Government/news/new-tool-calculates-nhs-and-social-care-costs-of-air-pollution

2.6 The Secretary of State for Defra has instructed many local authorities across the UK, including authorities in Greater Manchester, to take quick action to reduce harmful Nitrogen Dioxide (NO_2) levels, issuing a direction under the Environment Act 1995 to undertake feasibility studies to identify measures for reducing NO_2 concentrations to within legal limit values in the "shortest possible time". In Greater Manchester (GM) have worked together to develop a Clean Air Plan to tackle NO_2 Exceedances at the Roadside, referred to as GM CAP.

2.7 The core goal of the GM CAP is to address the legal requirement to achieve compliance with the legal Limit Value (40 µg/m^3) for NO_2 identified through the target determination process in Greater Manchester in the "shortest possible time" in line with Government guidance.

2.8 Throughout the development of the plan GM has considered a range of options to deliver compliance, overseen by the GM Steering Group[8], and to understand the type and scale of intervention needed to reduce NO_2 to within legal Limit Values in the "shortest possible time" across Greater Manchester.

2.9 A best performing option was recommended within an Outline Business Case (OBC) for further consideration and discussion with stakeholders and the public to aid the development of the Full Business Case.

2.10 In March 2019 the GM Authorities agreed the submission of the OBC that proposed a package of measures that was considered would deliver compliance in Greater Manchester in the shortest possible time, at the lowest cost, least risk and with the least negative impacts. This involved a Charging Clean Air Zone Class C with additional measures.

2.11 The OBC made clear the expectation that the UK Government would support the plans through:

- Clear arrangements and funding to develop workable, local vehicle scrappage / upgrade measures;
- Short term effective interventions in vehicle and technology manufacturing and distribution, led by national Government with local authorities;
- Replacement of non-compliant buses; and
- A clear instruction to Highways England with regard to air pollution from the Strategic Road Network (SRN) in Greater Manchester[9].

[8] Members include Directors or Assistant Directors from each GM authority.

[9] GM Authorities are directed to take action on the local road network. Those roads managed by Highways England, such as motorways and trunk roads are excluded from the Clean Air Plan.

2.12 In July 2019 the Secretary of State issued a direction under section 85 of the Environment Act 1995 requiring the 10 GM local authorities to implement the local plan for NO_2 compliance for the areas for which they were responsible, including a Charging Clean Air Zone Class C with additional measures, but with an obligation to provide further options appraisal information to demonstrate the applicable class of charging clean air zone and other matters to provide assurance that the local plan would deliver compliance in the shortest possible time and by 2024 at the latest.

2.13 Following that direction further information was supplied to the Secretary of State and the particular measures in the local plan were developed.

2.14 The Secretary of State subsequently issued a direction to the ten GM local authorities in March 2020 that required them to take steps to implement the local plan for NO_2 compliance so that compliance with the legal limit for nitrogen dioxide is achieved in the shortest possible time, and by 2024 at the latest, and so that exposure to levels above the legal limit for nitrogen dioxide are reduced as quickly as possible. That local plan involved a Charging Clean Air Zone Class C with additional measures[10]. The direction also required the submission of an interim full business case to the Secretary of State once any necessary public consultation had been completed in respect of the scheme.

2.15 The Clean Air Update report of 28 May 2020[11] detailed that in March 2020 the government provided initial funding of £41m for clean vehicle funds to award grants or loans to eligible businesses: £15.4m for bus retrofit, £10.7m for Private Hire Vehicles, £8m for HGVs, £4.6m for coaches and £2.1m for minibuses. Note: These figures include JAQU estimated delivery costs at 5%.

2.16 In the Clean Air Update report of 24 August 2020 detailed updates on the developments of the GM Clean Air Plan included the Light Goods Vehicles (LGV) and Hackney Carriage funding position, interaction with the Strategic Route Network and Highways England. The report also confirmed arrangements for distributing funding received for bus retrofit and highlighted separate discussions with the Department of Transport about funding for bus replacement.

2.17 It set out a proposal for consultation and detailed the policy for consultation. The report also considered the proposed Governance arrangements for the CAZ and that TfGM would act as an 'operating body' responsible for day-to-day operation of the CAZ and the implementation of other GM CAP measures. The report also highlighted the link to taxi and Private Hire Vehicle common minimum licensing standards (MLS).

[10] Further details about the local plan in March 2020 ae provided in Appendix 9.

[11] Also considered by the GM Authorities through their own constitutional decision-making arrangements.

2.18 The GMCA Clean Air Plan Update Report 22 February 2021 explained that the outputs of the GM CAP consultation and GM Minimum Licensing Standards (MLS) consultations would be reported as soon as is reasonably practicable and no later than summer 2021. The proposed final policy for the GM CAP would consider all the information and evidence gathered, so that the GM Authorities can understand the consequences that COVID-19 has had on vehicle owners and trades affected by the proposed GM CAP. It explained that the ten GM local authorities would undertake subsequent equalities, air quality and emissions impact assessments, to inform future decisions on each aspect of the final plan.

2.19 Following consideration of the Clean Air Plan Update Report in 22 February 2021 all ten GM local authorities agreed to establish the Clean Air Charging Authorities Committee (a joint committee created by the ten GM local authorities to enable decisions to be taken that are required to be taken jointly by the 10 GM local authorities as charging authorities) and the Air Quality Administration Committee (a joint committee created by the ten Greater Manchester local authorities and the GMCA).

3 CLEAN AIR – PROGRESS SINCE LAST UPDATE

3.1 Minimum Licensing Standards (MLS) for Taxi and Private Hire services

3.1.1 Hackney Carriage and PHV services are a significant part of GM's transport offer. In 2018, GM's ten local authorities agreed to collectively develop, approve and implement a common set of minimum licensing standards (MLS) for Taxi and Private Hire services that cover the whole of Greater Manchester. At that time, the primary driver for this work was to improve public safety, but vehicle age and emission standards in the context of the Clean Air agenda have now also become a major consideration.

3.1.2 As licensing is a local authority regulatory function, the work to devise the Standards has been undertaken by the Greater Manchester Licensing Managers Network, with TfGM supporting the co-ordination of this work, and alignment with other relevant Greater Manchester level policies.

3.1.3 The ten Greater Manchester authorities conducted an eight-week consultation from 8 October to 3 December that was carried out virtually and adhered to the Government COVID-19 guidance around social distancing. The purpose of the consultation was to inform and seek the views of the trade and the public about the proposals and engage impacted groups (the trade and the main service users) to build understanding and awareness to inform the final standards, alongside the GM Clean Air Plan, so that the trade could see and input into the policy landscape which would affect them.

3.1.4 Whilst the MLS will complement the GM Clean Air Plan, common vehicle standards will not be in place prior to the launch of the GM Clean Air Zone. Therefore, licensing conditions will not be used at this stage to support delivery of the GM Clean Air Plan, however, all future conditions around vehicle standards will complement this activity.

3.2 Outstanding funding asks

3.2.1 As reported in July 2020, government accepted the need for vehicle replacement funds for Hackney Carriages, and Light Goods Vehicles, but requested further development of shared evidence on the needs within this complex sector before responding to the specific asks.

3.2.2 On 11 February 2021 Government confirmed by letter that it will provide £14.11m for Hackney Carriages and £73.5m for Light Goods Vehicles. The Hackney Carriage award comprises £10.61m to support grants and loans to upgrade vehicles; £3m for dedicated electric vehicle infrastructure; and £0.5m for an EV Hackney carriage try before you buy scheme, confirming scope for the ten GM local authorities to move funding between the Hackney Carriage elements. These figures include JAQU estimated delivery costs at 5%.

3.2.3 GMCA's Clean Air lead, Councillor Western responded to Ministers requesting an urgent meeting to outline Leaders' concerns that the 11 February letter did not take into account the need for revision in the light of the emerging findings on the impact of COVID-19 and in respect of the statutory consultation, following a briefing that TfGM officials had given to the Joint Air Quality Unit (JAQU) on the profound impact that the pandemic has had on a number of the business sectors impacted by the proposed Clean Air Zone.

3.2.4 This meeting took place on 15 March 2021. Councillor Western advised that the analysis undertaken by TfGM is clear that the case for the right Clean Air Plan to address NO_2 emissions in GM in the shortest possible time remains. Therefore, in advance of any consideration of COVID-19 impact, GM would like to encourage a reconsideration of the level of baseline funding support, for LGV replacement costs in particular, so that it met the funding request submitted in the OBC.

3.2.5 Reflecting on the work that has followed this meeting Councillor Western wrote on 29 April to Ministers setting out the issues to be resolved if GM was to make a final plan. These were identified as the level of LGV, hardship and bus replacement funding, as well as a commitment from Government to work closely together with GM to monitor and evaluate progress, adapting it if the impacts require change to any aspect of the Plan. This included the consideration of additional funding if the impacts prove to be more severe than forecast.

3.2.6 On 9 June, Ministers wrote to Councillor Western confirming their position on the outstanding funding asks.

- On bus replacement funding Ministers confirmed that they will provide £3.4m to support bus replacement by small and medium size companies.

- Apart from that addition Ministers stated that they did not plan to increase the amount awarded. GM had asked for the LGV funding amount of £73.5m to be reconsidered against the ask of £80m. With regards to the need for a Hardship Fund Ministers stated they "were not convinced" that it was the best way to mitigate the impact of uncertainty due to the pandemic, in addition to the awards already made. They also advised of the other government schemes in place to address wider business impacts.

- Ministers also stated that they wish to ensure that NO_2 plans are being delivered as planned and adapted if necessary. Ministers confirmed they cannot make any future funding commitment at this stage – but stated they would continue to work with GM to understand the situation in the future based on the monitoring and evaluation of progress, including the funding position if the impacts prove to be more severe than forecast.

3.2.7 At a meeting on 15 June Minister Pow and JAQU officials confirmed that a mechanism would be agreed to ensure that Clean Air Funds can be adapted if necessary and, that they will continue to work with GM to collectively understand the situation, including the funding position, if the impacts prove to be more severe than forecast. This assessment methodology will be agreed by the Air Quality Administration Committee in advance of the funds opening in November 21.

3.2.8 As further funding to address potential cases of hardship may be needed, Greater Manchester Authorities will be monitoring the situation very closely to ensure that they can take up the Government's offer to review the need for further funding if the need can be objectively demonstrated.

3.3 Try Before You Buy & EV Taxi Infrastructure

3.3.1 In the consultation it was proposed that EV charging infrastructure (EVCI) would be installed to support the taxi trade in GM. The charging posts will be installed in suitable, available and sustainable locations, with a focus on repurposing public sector assets and will be supported by the development of an EV Taxi (Hackney Carriage and PHV) charging membership scheme. As set out in para 3.2.2 of this report the Government have offered £3m towards GM's ask of £6.5m, this is sufficient to deliver 28-30 charge points, compared to the planned provision of 40 charge points.

3.3.2 In the consultation it was proposed that there would be a "Try Before You Buy" initiative for GM-licensed hackney carriage drivers to test electric vehicles and address uncertainties such as operating costs, range anxiety and availability of charging infrastructure. The funding ask for this is £1.69m, however Government have offered £0.5m. This is not sufficient funding to deliver the scheme. Therefore, alongside the changes to the timeline on delivering common vehicle standards through the GM Minimum Licensing Standards and the wider options for vehicle upgrades for hackney carriages and Private Hire Vehicles (outlined in sections 7.5 and 7.6) it is recommended that this funding is reallocated by the ten GM local authorities to provide an additional 6-8 charge points dedicated for use by taxis within the EVCI programme.

3.4 Strategic Road Network managed by Highways England

3.4.1 The ten GM Authorities continue to ask the Government to direct Highways England to tackle NO_2 exceedances on the Strategic Road Network (SRN) in the same way GM Authorities are having to take action on the local road network.

3.4.2 In particular, Tameside MBC has highlighted to Ministers that the inconsistency in approach is leaving many residents unprotected, particularly, around the A628/A57, a strategically important trans-Pennine route that passes through the villages of Hollingworth and Mottram as a single carriageway. This route, managed by Highways England, will be left with NO_2 exceedances that are not being addressed, despite the area being declared as part of GM's Air Quality Management Area.

3.4.3 As previously reported on 25 August 2020, Tameside MBC were notified that Government ministers have agreed to consider extending Greater Manchester's Clean Air Zone (CAZ) charges to the sections of the A628/A57 which form part of the Strategic Road Network, within the proposed CAZ boundary. The extension of any charges to the A628/A57 will be subject to a full assessment of the potential impacts, to be led by Highways England. This will cover air quality impacts on other roads, safety impacts, carbon impacts, as well as wider issues for Highways England, such as operational and network issues.

3.4.4 On 9 June Ministers wrote to the Leader of Tameside MBC to advise that following consideration of assessment provided by Highways England, Ministers have agreed to the inclusion of the identified section of the A57 and A628 within the Greater Manchester charging Clean Air Zone and that Government will work collaboratively with Tameside MBC, TfGM and Highways England to establish the most appropriate solution for the charging mechanism to be applied on this section of the Strategic Road Network within the current legislation and timeframe available.

3.5 Clean Bus Fund – Retrofit

3.5.1 As reported in July 2020 the Government awarded £14.7m as an initial tranche of funding to retrofit buses running services in Greater Manchester that have older engines which are not compliant with the GM CAZ emission standards. Government also confirmed the funding award for Bus Retrofit funding should be distributed as a continuation of the Clean Bus Technology Fund. As this funding mechanism is distinct from the wider delivery of the GM CAP, no consultation feedback was requested on this aspect of the policy.

3.5.2 The distribution of Bus Retrofit funding commenced in December 2020.

3.5.3 This fund offers operators of locally registered bus services up to £16k of funding per vehicle towards the retrofit of non-compliant buses before the launch of the Clean Air Zone in Spring 2022. The funding is available for vehicles, including minibuses and coaches, operating on a registered bus service within Greater Manchester. This includes cross-boundary services operating within the GM CAZ boundary.

3.5.4 As at the end of May, there have been 63 applications made by 18 operators. The total number of buses eligible for retrofit funding that has been approved is 756. The total funding that has been approved is just over £11.7 million.

3.5.5 The retrofitting of buses has now started, with seven operators having commenced retrofitting their vehicles, at the time of publication.

3.6 Clean Air Zone Preparatory Arrangements

3.6.1 The ten GM local authorities are undertaking the preparatory implementation and contract arrangements required to deliver the CAZ and other GM CAP measures. Preparatory work is required in order to maintain delivery momentum in line with the funding arrangements agreed with Government, for example in relation to automatic number plate recognition (ANPR) cameras, back office systems and service providers. Given that the ten GM local authorities are subject to the direction to implement the CAZ, the preparatory procurement arrangements commenced without a risk of the consultation outcome being pre-judged.

3.6.2 TfGM is running the procurement exercises with potential suppliers on behalf of the ten GM local authorities to final evaluation and is to provide a report to allow the authorities to make a decision to award to the successful supplier(s) on receipt of the confirmation of funding from Government.

3.6.3 Once the ten GM local authorities make a final plan mobilisation will commence. The geographic scale of the zone (almost 1,300km^2) is such that over 2,300 road signs and almost 1,000 automatic number plate recognition (ANPR) cameras will need to be installed on the highway network. The cameras need to be integrated into a technology platform, that will also be connected to the payment and vehicle checking services which are being established by central government. In addition, the operational teams of both TfGM and the chosen supplier must be recruited, trained and mobilised.

3.6.4 Whilst much of this technology is tried and tested, the programme schedule is complex. This currently shows that implementation of a scheme that has fully tested all of the component parts is late May 2022 and therefore this is now the earliest date that the GM CAZ could launch.

3.6.5 **Procurement Update** – All of the major enabling procurements have now been completed. Each of the ten GM local authorities will use existing delegation arrangements to award contracts. The timely award of the contracts are critical for the disbursement of funds before the end of 2021 and the commencement of the CAZ in May 2022.

3.6.6 **ANPR / Signage** – Once the boundary of the Clean Air Zone has been determined the location of the signs/cameras can then be formally agreed by the respective Highway Authorities. However, work has been done on signs/cameras locations by officers working on the GM CAP on the basis that the boundary was anticipated at the GM administrative boundary (and noting that the GM local authorities are subject to a ministerial direction to implement a GM-wide CAZ C). The Cabinet are requested to agree the Clean Air Zone ANPR and signage locations, as set out at Appendix 10.

3.6.7 **Operational Agreement for the Central Clean Air Service with JAQU** – in order to access central government services such as the national payment portal, the ten Greater Manchester local authorities will be required to enter into a legal agreement with the Secretary of State for JAQU/DVLA to provide the CAZ Central Services. The services will consist of a vehicle compliance checker, a customer payment portal and a centralised vehicle database (which are being made available by JAQU to enable the operation of all UK Clean Air Zones). In providing the CAZ central service customer payment portal JAQU charge a £2 fee per transaction.[12] This transaction charge is payable by all Authorities operating UK Clean Air Zones. For example a taxi driver paying a £7.50 daily charge, £2 will be kept by JAQU and £5.50 will be paid to the ten Greater Manchester local authorities to manage and operate the zone.

3.6.8 The Air Quality Administration Committee has the authority to agree the final form of the Operational Agreement for the Central Clean Air Service, and to authorise the making of the agreement, on behalf of the ten GM local authorities.

4 CLEAN AIR – CONSULTATION SUMMARY OF RESPONSES

4.1 As reported in January the ten GM authorities conducted an eight-week consultation from 8 October to 3 December 2020 which was carried out virtually and adhered to the Government's COVID-19 guidance around social distancing. The purpose of the consultation was to seek views from residents, visitors, stakeholders and businesses on the proposals to achieve legally compliant NO_2 levels in Greater Manchester. The GM Minimum Licensing Standards consultation ran in parallel to ensure that those impacted and/or interested in the proposals could have a complete view of the proposed changes to vehicles and the financial support available.

4.2 The consultation was not seeking views on whether to introduce a charging scheme as that has been directed by the Secretary of State. It set out a position for consultation on the daily charge, discounts and exemptions of a Category C GM Clean Air Zone, and the proposals for the supporting funds.

4.3 TfGM, on behalf of the ten Greater Manchester authorities, conducted the consultation, under the Clean Air GM brand. AECOM – an independent consultant – was appointed to receive, manage, process and analyse the consultation responses on TfGM's behalf; to undertake qualitative research on the proposals (a research method of facilitated sessions to seek feedback from representative groups); and produce a full report on the findings from the consultation.

4.4 The consultation was also supported by engagement activity to ensure all groups could engage with the consultation materials and respond in a meaningful way.

4.5 The consultation materials were published on www.cleanairgm.com on 8 October 2020. This included the consultation document, the questionnaire, technical reports, the policy for consultation and supporting public facing materials such as leaflets and fact sheets.

[12] The Clean Air Zones Central Services (Fees) (England) Regulations 2020 set out the fee per transaction payable by charging authorities for use of the customer payment portal.

4.6 A total of 4,768 responses were received during the consultation period:

- 3,954 via online questionnaire
- 770 via email
- 43 paper questionnaires
- 1 telephone response

4.7 The majority of respondents (3,858) were individuals / members of the public, with 784 responses from businesses, including anyone who is self-employed and / or a sole trader and includes taxi owners, drivers and operators. There were then 124 responses from representatives including but not limited to schools, charities, social enterprise, trade organisations, Government bodies and councilors and elected officials. Two respondents did not answer the question about the respondent type in the questionnaire.

4.7.1 The full AECOM report can be found in Appendix 3.

4.7.2 As part of its local consultation plan Stockport consulted on the proposed ANPR and CAZ signs locations. No responses were received during the consultation period.

4.8 **Stakeholder responses**

4.8.1 Hackney Carriage and Private Hire Vehicle representations

4.8.2 Representations were made from 343 hackney carriage and PHV drivers and operators, as well as from several representative bodies. The representations covered many personal circumstances around the changes to income seen during the pandemic. There were also views suggesting that:

- The Clean Air Zone should include private cars
- Pollution levels do not warrant the measures being taken
- Clean Air Zone boundary is too large
- The hours of operation for the Clean Air Zone running from midnight to midnight should not be the transition time between 24-hour periods
- Hackney carriages and PHVs should be permanently exempt
- Disabled passenger vehicles should not be permanently exempt
- Discounts should be offered to hackney carriages
- Only grants should be available
- Oppose funding the upgrade of non-compliant vehicles (specifically buses and non-WAV taxi/PHV)
- Concerns about affordability of upgrades and indebtedness and concern that vehicle finance would need to be at or close to 0% interest rate to be affordable
- More support required for smaller businesses
- Funding for minibuses should be higher due to unaffordability of upgrade
- Funding being offered to upgrade to ZEC is not enough
- EV infrastructure – not enough to support the trade

- Funding should be higher for hackney carriages and PHVs due to unaffordability of upgrade
- Opposition to the Try-Before-You-Buy (TBYB) Hackney Carriage Scheme
- More funding is needed in the Hardship Fund.

4.9 Environmental campaigners

4.9.1 During the consultation there were two environmentally focused campaigns, where emails were sent to elected members and directly to the consultation email account. One of the campaigns, which included 172 emails, (referred to as the Environmental Bill Lobby group in the AECOM report, see Appendix 3) asked for a more ambitious clean air zone including for all polluting vehicles stating that it was unclear how the proposed zone will lower pollution as quickly as possible, given it does not include restrictions on private vehicles.

4.9.2 The campaigners also asked for an earlier timeline for delivery and action, asking for compliance before 2024, as well as greater incentives for walking and cycling, as well as for cleaner vehicles and public transport. They endorsed the funding to support those with non-compliant vehicles to upgrade, however they asked for more incentives around providing alternatives to car use, such as car clubs and e-bike schemes. The campaign also asked for a commitment to reach WHO levels for particulate matter (PM2.5) by 2030 and targeted action to reduce pollution outside schools, hospitals, and care homes to protect those most at risk.

4.9.3 There was a second environmental campaign of 484 emails (referred to as the CAZ Campaign group in the AECOM report, see Appendix 3) to members and the consultation. This focused on three points asking for:

- charge levels to be set at levels that achieve real changes in the way people travel;
- an ultra-low emission zone (ULEZ) to be introduced in Manchester City Centre which includes all polluting vehicles; and
- the government to provide financial support to help those individuals and businesses who need to change to cleaner vehicles.

4.10 National Friends of the Earth and Manchester Friends of the Earth

4.10.1 These two representations supported the principle and implementation as soon as practically possible of a CAZ. They supported the proposed boundary and hours of operation, and the proposals for funding. But they considered that to meet the requirement to ensure legal limits on NO_2 are met in the shortest time possible required the creation of a CAZ Category D, because diesel cars are the big problem for roadside illegal NO_2 levels. The option of a ULEZ/CAZ D for the city centre and Inner Ring Road would improve air quality in the city centre and benefit wider areas. They also considered that the CAZ proposals need to be set in the context of a wider sustainable transport strategy**.**

4.11 ClientEarth

4.11.1 ClientEarth provided a full written response to the GM CAP Consultation. On a number of key points it supported the proposals in the consultation. In particular there was support for the boundary, the hours of operation and signage, financial support for bus upgrades and the Clean Commercial Vehicle Fund, hackneys, private hire and a hardship fund.

4.11.2 However, for a number of reasons (summarised below) ClientEarth considered that the consultation proposals '*did not go far enough to reduce illegal levels of pollution across Greater Manchester with the urgency required by law'*:

Failure to favour the most effective options – including tackling pollution from private cars:

4.11.3 ClientEarth stated that the Councils' CAZ proposal would do nothing to tackle pollution from private cars. ClientEarth considered that cars are the biggest contributor to illegal levels of pollution across Greater Manchester and made reference to the GM council's own analysis which showed that cars account for 45% of road based NOx emissions across the region.

4.11.4 ClientEarth asserted that a class D CAZ, which includes private cars, would be likely lead to quicker reductions in NO_2 pollution than the class C CAZ option put forward for consultation. It also considered that an inner ring road class D CAZ, delivered alongside the wider regional class C CAZ proposals, could accelerate pollution reductions, bringing benefits in the early years (with reductions in the number of sites in exceedance in 2021) and also deliver greater certainty that compliance will be achieved across the region by 2024, by reducing the number of points modelled to be below the limit value but within the margin of error of the Councils' model.

4.11.5 By excluding this class D CAZ option from their proposals, ClientEarth considered that the GM councils had applied a flawed interpretation of the case law regarding the legal requirements the councils' plan must satisfy. Both the target date for compliance and the route to that target which reduces exposure as quickly as possible must be treated as primary determining factors when identifying and prioritising measures for inclusion.

Failure to account for modelling uncertainties:

4.11.6 ClientEarth considered that the GM CAP proposals failed to account for modelling uncertainty in a way that ensured that those proposals were "likely" to deliver compliance with legal limit values in the shortest possible time, in line with the relevant legal tests. ClientEarth raised concerns that forecasts of improvements in air quality have been shown to be overly optimistic in the past. ClientEarth also raised the point that the calculated Root Mean Square Error values are relatively high suggesting a high degree of error in the air quality projections.

CAZ Charges for vans (£10) are too little:

4.11.7 ClientEarth considered that to the extent that higher charges are likely to lead to either (a) an earlier overall compliance date, or (b) a route to compliance that reduces human exposure to pollution more quickly, higher charge levels must be adopted as part of the final CAZ plans if they are to satisfy the necessary legal requirements. ClientEarth considered that the analysis also shows that by further increasing the charge for LGVs to £12.50, the "stay and pay" response could be reduced by a further 15%. They also considered that given the extent that a higher LGV charge would lead to more rapid pollution reductions, it would need to be included in the Councils' final plan.

The scope of permanent and temporary exemptions should be limited:

4.11.8 ClientEarth urged the GM Councils to limit the scope of permanent local exemptions to the greatest extent possible and considered that if exemptions are set too broadly they risk undermining the effectiveness of any CAZ and therefore the likelihood of achieving compliance with NO_2 limit values in the shortest possible time. The focus should instead be on providing direct support to people and businesses to switch to alternative cleaner forms of transport. In particular, ClientEarth did not agree with the Councils' proposals to provide discounts to those PHVs also used as private vehicles.

4.11.9 Again ClientEarth urged the GM councils to limit the scope of temporary local exemptions to the greatest extent possible and considered that if exemptions are set too broadly they risk undermining the effectiveness of any CAZ and therefore the likelihood of achieving compliance with NO_2 limit values in the shortest possible time. In particular, ClientEarth strongly disagreed with the exemption for LGVs and minibuses for a number of reasons. ClientEarth noted the GM Councils' own analysis, which showed that LGVs account for 29% NOx road transport emissions, and that LGVs are the second biggest contributor to illegal levels of NO_2. ClientEarth also disagreed with the Councils' rationale behind the exemption but in any event in its view the priority of the Councils' air quality plan should not be to avoid the disruption to the market value of second hand LGVs but rather to protect peoples' health as quickly as possible. If there was to be any such exemption it should be limited to the greatest extent possible.

4.11.10 ClientEarth considered that the GM councils should instead be focusing their efforts on working with government to provide help and support for drivers and fleet managers to clean up or upgrade their vehicles, and/or adopt technologies to help them manage their transport needs more efficiently and use cleaner alternatives.

4.12 Business representations

4.12.1 441 businesses responded to the consultation, as well a number of regional and national stakeholders who represent GM businesses. Their feedback is included in the AECOM Report.

4.12.2 The Federation of Small Businesses, GM Chamber of Commerce and CBI wrote a joint letter as part of their submission to the GM Clean Air Plan consultation. They recognised the need to address poor air quality but considered that now was not the right time to be moving forward with the proposed structure and format given the difficulties faced by the business community as a result of COVID-19 (supported by a business survey). They suggested that:

- The financial offer falls way short of what is needed, and it should be made available as quickly as possible and prior to the start of the CAZ itself.

- The introduction of charging should be delayed so businesses have adequate time to make the necessary changes, recognising the extreme economic circumstances created by Covid-19: otherwise the charges may result in increased business costs without achieving the desired reduction in pollution: the CAZ should not be introduced sooner than 2024.

- GM should revisit the proposals to reflect current, short and medium term requirements taking account of updated data on the impact of the pandemic on air quality in GM.

4.13 **Other key findings of the consultation** feedback on the **GM Clean Air Zone** included:

- There was some support for the proposed boundary, with some commenting that the area should be increased and include the SRN. Others commented that the area was too large, that the zone should be limited to the city centre. There were also concerns from neighbouring local authorities on the impact on their businesses and routes.

- Over half of the public and representatives, who provided a comment on the hours of operation were generally supportive, whereas two thirds of businesses suggested amendments to the operation time including using peak and off-peak charging.

- Views on the proposed daily charge varied, in general businesses felt charges for all vehicles are too much and generally the public felt the charges are about right or too little. This was across all vehicle types.

- For the permanent and temporary local exemptions and the permanent local discounts, there was broad support from both the public and businesses. There were some concerns from the public about continuing to have polluting vehicles on the road. However, there were also some comments raised around further discounts and exemptions that were deemed necessary to support GM's economy and recovery from COVID-19. This is set out in more detail in the report at Appendix 3.

4.13.1 Feedback on the **Funding to upgrade non-compliant vehicles**:

- There was high level of support for the funds amongst all respondent types and many felt it was needed in order to help business upgrade.

- However, there were concerns about the funds and their management.

- Many comments received stated that the proposed amounts to support each vehicle type were not enough. There were also some comments made for those who are not in GM not being eligible for the funds.

- There were some concerns raised about mismanagement of the funds and people taking advantage of the scheme.

- Some respondents who thought they had non-compliant vehicles and would be impacted by the CAZ were unsure whether they would be eligible for funding.

4.13.2 Feedback on the **other supporting measures**

- For the Try Before You Buy initiative for GM-licensed hackney drivers, there was both support and concerns. Supportive comments mentioned that it will support vehicle owners to overcome anxieties surrounding electric vehicle technology and encourage more drivers to convert to electric. Others commented that it could be extended to other vehicles such as PHV and LGVs. But there were also concerns about how it would work, vehicle performance and charging infrastructure.

- There was strong support for the Hardship fund from members of the public, businesses and representatives.

- There was a polarised view of the proposed finance offer; a third of comments were supportive stating it was vital to helping businesses upgrade to compliant vehicles. However, a third of comments were negative raising concerns it could lead to increased debt for those receiving loans, putting increased pressure on businesses.

4.13.3 Feedback on the **impact of COVID-19**

- 76% of businesses and 79% of taxis stated they had been financially impacted by COVID-19. This included increased levels of debt, reduced savings and lower turnover. Many stated any savings had been used and felt their credit rating had decreased. There were comments asking for the proposals to be delayed and that COVID-19 had led to improvements in air quality, so the CAZ may not be required.

4.13.4 Feedback on the **importance of air quality and confidence that the GM Clean Air Plan will bring down levels of NO_2**

- Members of the public and representatives mainly agreed there is a need to improve air quality in Greater Manchester, fewer businesses did. Some felt the proposals did not go far enough but others felt there were other much larger contributors to air pollution than traffic.

5 COVID-19: THE IMPACTS

5.1 To understand the wider impacts of COVID-19 the GM CAP officer team have undertaken an assessment of the possible impacts of COVID-19.

5.2 Since the COVID-19 pandemic has progressed there have been many questions about what its effect on traffic means for Greater Manchester's Clean Air Plan (GM CAP). In particular, the GM Authorities are asked for comparative data for Air Quality monitoring for this year – during the full lockdown period and more recently – compared with last year.

5.3 The GM Clean Air Plan monitors NO_2, using diffusion tubes at 222 sites where "target determination" modelling predicted illegally high levels of NO2 in 2021. The GM CAP monitoring and evaluation plan has commissioned a further extension to the NO_2 monitoring network, expected to be in place mid-2021. This is designed to enable evaluation of the scheme performance and confirm compliance with legal limits.

5.4 Air pollution reduced in 2020 as a result of the travel and economic restrictions in place due to the COVID-19 pandemic. In 2020, 16 of the above sites measured NO_2 concentrations exceeding the legal Annual Average standard of 40 µg/m3. Exceedances were recorded in Manchester, Tameside, Stockport, Bolton and Rochdale. This compares to 129 locations that were measuring concentrations above 40 µg/m3 in 2019. The significant improvement in air quality during the lockdown period does demonstrate that traffic is the primary factor causing exceedance, and that reducing vehicle emissions will lead to improvements in NO_2.

5.5 However, travel patterns and the associated pollutant emissions returned to near pre-COVID-19 levels towards the end of 2020, and it is expected these improvements in NO_2 will not be sustained through 2021.

5.6 The Secretary of State has directed the 10 GM local authorities to implement the local plan13 to address exceedances of the Annual Average standard for NO_2 which is set at 40 ug/m3. The GM Clean Air Plan is required to take action to tackle NO_2 levels over a number of years into the future in order to demonstrate compliance with legal limits14 and the nearer term influence of COVID-19 on air quality is not expected to lead to sufficiently long-term reductions in pollution such that the modelled exceedances of the legal NO_2 limits will be met without implementing a Clean Air Zone.

5.7 The ways in which the COVID-19 pandemic could influence future emissions has been considered in the Impacts of COVID-19 Report (see Appendix 5). They are:

[13] The 10 authorities may not vary, revoke or suspend their implementation of the local plan without the prior written consent of the Secretary of State.

[14] The modelling approved by Government of NO_2 concentrations in Greater Manchester predicts that exceedance of the legal limit is likely to continue until 2027, if action is not taken to reduce road vehicle emissions.

- Delay in fleet upgrades: Due to the uncertainty in the economy and vehicle supply chain generated by the COVID-19 pandemic, there is evidence showing a fall in the number of new vehicle registrations, indicating that vehicle owners are delaying upgrading their vehicles. This has resulted in a more non-compliant fleet operating in GM and higher emission outputs from these vehicles than previously assumed. Following a review process with JAQU, the GM CAP baseline monitoring of air quality for the purpose of the Clean Air Plan has been updated to reflect this change to the on-road fleet.

- Increased working from home: More people have worked at home during the pandemic than ever before and there is evidence that some businesses are planning to maintain at least some working from home for their employees, but the extent of future home working and impact on the road network remains highly uncertain. The reductions in commuting trips on the road network associated with increased working from home patterns may also be tempered by factors influencing travel mode choice. It is also recognised the commute mode choice is affected by journey times, with the GM road network experiencing significant delays due to congestion in peak periods. The effects of suppressed demand on the road could rapidly offset gain from working from home patterns, as commuters switch back from public transport options to car due to improved journey time, and also social distancing or hygiene perception on public transport options.

- Government guidance precludes the GM CAP from incorporating any assumptions about future home working patterns into its baseline modelling. However, indicative modelling for the GM CAP has shown that even with the largest predicted levels of reductions in commuters, increased home working is likely to translate into only marginal benefits in the number of exceedance locations. These benefits would be significantly outweighed by the increases in exceedance locations experienced through worsened vehicle emissions due to the delayed fleet upgrade.

- Reduction in bus mileage: Patronage on buses has reduced during the pandemic. Evidence shows that after the initial drop in supply, bus mileage has been maintained close to full operation. This has been due to the support offered by Government. However, at this stage it is unknown whether the level of bus services operated in GM will continue or how long for. Additionally, both potential routes which could be affected are also unknown, and reduced bus patronage may be associated with a modal switch from bus to private car, rather than simply a reduction in trips. Indicative testing of reduced bus mileage suggested marginal benefits across GM's exceedance locations. However, these indicative benefits did not offset substantial increases in exceedances linked to delayed fleet upgrades. Amendments to bus mileage have not been incorporated within the GM CAP models.

- Changes in the economic circumstances of vehicle owning businesses: it is evident that businesses overall have lost revenue, used up reserves and are more indebted and less able to borrow than prior to the pandemic. A significant minority of businesses remained closed at the end of March 2021. Investment cycles have been and may remain disrupted. This is not affecting all vehicle types or sectors equally. This, along with potential constraints on the supply of compliant vehicles, means that vehicle owners may be less able to upgrade their vehicles in response to the CAZ. Indicative testing shows that, if the pandemic meant that businesses were more likely to stay and pay, this could lead to increased emissions and exceedances. Providing businesses with more time or financial support can help ensure that they upgrade their vehicles in response to the CAZ, rather than choosing to 'stay and pay'.

6 GM RESPONSE TO CONSULTATION

6.1 Following the consultation, TfGM has reviewed consultation Reponses, using the methodology set out in the Appendix 4, alongside the COVID-19 impacts analysis, Economic Implications Report, further air quality modelling and EQIA. These documents have informed the "Response to the Consultation Report" at Appendix 4, which has been prepared by TfGM on behalf of the 10 GM local authorities, who will also be asked to endorse it as their response in the Local Authority reports.

6.2 The following paragraphs summarise the responses to be found in Appendix 4 on some of the main issues raised. More technical matters, such as issues about modelling uncertainty, are dealt with there and in related reports.

6.3 Whether the local plan for NO_2 reductions (March 2020) should not now be implemented: Modelling does not indicate that such a plan is no longer necessary. The 10 GM local authorities are obliged to implement the local plan for NO_2 reductions considered by the Secretary of State in March 2020 as a result of the direction that was then issued in any event unless it is varied or revoked. How the final plan complies with the Ministerial Direction issued in March 2020 is addressed in Appendix 9.

6.4 The Clean Air Zone:

- Alternatives **to a Charging Clean Air Zone should be prioritised.** The ten GM local authorities have been directed by the Secretary of State to introduce a Class C Clean Air Zone. In Greater Manchester evidence demonstrates in any event that due to ongoing exceedances of the legal limit value for NO_2 across the Greater Manchester region, existing and future pollutant concentrations within Greater Manchester warrant the implementation of the GM CAP.

- The charging CAZ **should be Class D or should be supplemented by a Class D CAZ within the Inner Ring Road**. The authorities were directed by the Secretary of State in March 2020 to implement their local plan for for NO_2 compliance that was considered by the Secretary of State on March 16 2020 which included a Class C CAZ in Greater Manchester following rejection of these alternatives (as explained in Appendix 9). Forecasting shows that 2024 is the first year of compliance with the legal limits for nitrogen dioxide within Greater Manchester with the local plan. Achieving compliance in Greater Manchester is not possible sooner with the other options that have been suggested.

- **A number of specific roads and areas were requested to be included or excluded from the CAZ**. The response to consultation report summarises each of these points in turn to make sure that the boundary in place aligns to the principles of a fair, consistent and easily communicable zone boundary. Feedback from the consultation highlighted that the A575 and A580 at Worsley was not included. It is recommended that a consultation is held on the inclusion of the A575 and A580 at Worsley in the GM Clean Air Zone.

- **The proposals should be implemented earlier or later than proposed.** Due to the nature of this programme, the CAZ could not be implemented earlier than planned. The ten GM local authorities are also under an obligation by virtue of the direction by the Secretary of State to implement the local plan for NO_2 compliance as soon as possible. However, for those who requested that charges be introduced later, there are now a number of additional temporary exemptions in place, to provide more time to those who need it most to upgrade their vehicle.

- **Hours of operation – the CAZ should not operate 24 hours a day 7 days a week.** This included having peak and off-peak hours, not charging on evenings and weekends and operating at alternative times than midnight to midnight. The Response to Consultation Report explains that due to a number of factors, including the impact of a potential change in travel behaviour resulting from the CAZ, not operating 24/7 may have on reducing air quality means that the proposed hours of operation should remain 24 hours a day, 7 days a week.

- The **charges should be higher / lower for non-compliant vehicles or vary depending on the emissions standards or miles travelled within the CAZ.** The Response to Consultation Report responds to each of these points separately, outlining the analysis that has been undertaken to respond to these points and other measures that have been introduced to better mitigate any adverse impacts raised. No changes to the charges are recommended.

- **The GM Clean Air Zone should include other pollutants and higher vehicle standards and private cars**. The ministerial direction requires the GM CAP specifically to tackle NO_2 Exceedances at the roadside. The Greater Manchester wide approach set out in the consultation is the scheme which delivers compliance with the legal limit for NO_2 in Greater Manchester in the shortest possible time, providing considerable health benefits at the lowest cost to society and the economy.

- **Charges should apply to M1 vehicles with a body type of 'motorcaravan.'** Feedback from the consultation highlighted motorhomes can be classified in more than one way by the DVLA. Currently, non-compliant motorhomes classified as N1 or N2 would be charged in the GM CAZ scheme as a non-compliant LGV, with a £10 daily charge. However, a group of vehicles with a body type of 'motorcaravan' and a vehicle type approval of M1 (or M1 Special Purpose) that are non-compliant, would not be charged in the current GM CAZ scheme. Feedback from the consultation highlighted the lack of parity between this classification vehicles. It is recommended that a consultation is held on the inclusion of motorhomes classified as MSP1 in the GM Clean Air Zone.

- **Permanent exemptions should be limited:** Some permanent exemptions are nationally stipulated, because some types of vehicle are engaged in unique or novel operations or are particularly difficult or uneconomic to adapt to comply with the Government's Clean Air Framework requirements. As guided by the Government's Clean Air Zone Framework, Greater Manchester has constrained the permanent exemptions offered. The current exemptions are considered proportionate. The proposed local permanent exemptions are not expected to delay the date of compliance[15]. GM's response to this issue is set out in Section 8 of GM's Response to Consultation Report.

- **Private leisure vehicles should be permanently exempt.** Feedback from the consultation has suggested that private leisure vehicles which are HGVs are considered too expensive to upgrade, particularly from those who live outside of the CAZ boundary, also restriction of Leisure Vehicles Discount to vehicles registered in Greater Manchester is not parity of treatment with vehicles <3.5t and could damage the Greater Manchester leisure industry, e.g. events, equine and caravan park businesses, by excluding non-GM vehicles due to cost of entering the zone. This issue will be addressed through changes to the permanent local discount for all vehicles classified under the Private HGV tax class to be eligible for a discounted charge of £10 per day.

- **Vehicles used by disabled users should be permanently exempt**. This issue will be addressed through a permanent exemption for privately owned LGVs or minibuses, where they are specially adapted for use by a disabled user, which is not covered by the Disabled Vehicle Tax Class, subject to restrictions on their use through eligibility criteria.

[15] See Appendix E of the Air Quality Modelling Report, Appendix 6 of this report

- **Buses, taxis and other vehicles should be permanently exempted from the CAZ.** Using the analysis from the Impacts of COVID-19 research as well as consultation feedback a number of permanent exemptions have been set out, including for heritage buses, training buses, Specialist HGV tax classes. As well as this, buses used on a Greater Manchester school bus service tendered prior to March 2019 will be exempt to the end of July 2022. However, buses will not be exempted, in order to encourage more buses to be compliant when the CAZ is introduced. A temporary exemption will be in place for all GM-licensed Hackney Carriages and Private Hire Vehicles until 31 May 2023. This is to provide the GM taxi trade with more time to recover from the effects of COVID-19 and support their ability to invest in upgrades to compliant alternatives before a charge is applied.

- **There should be limited local temporary exemptions included in the scheme**. Under the Government's Clean Air Framework, further local exemptions and discounts can be proposed where appropriate so long as they do not undermine GM's ability to achieve compliance in the shortest possible time. Prior to the consultation information[16] was published and set out evidence to suggest that introducing a CAZ C across the region before 2023 without a temporary exemption for LGVs would not be effective, as there would not be a sufficient fleet of affordable second-hand LGVs available to enable GM's van owners to upgrade in response to the scheme. In light of the pandemic, there is evidence to suggest that many LGV owners have experienced reduced turnover and profits, have used up savings/reserves, are more indebted, and have delayed or are planning to delay capital investment (including in replacement vehicles) as a result of the pandemic. There is also evidence to suggest that GM Hackney Carriages and Private Hire Vehicles need more time to upgrade their vehicles to compliant alternatives in order to protect the service they provide to vulnerable users across Greater Manchester Modelling of the post-Consultation policy demonstrates that even with the scheme fully in place (and no temporary exemptions remaining in force), compliance is not achieved in 2023. A further year of natural fleet renewal is required in order for compliance to be achieved in 2024. Therefore, the temporary local exemptions are not forecast to delay compliance from 2023 to 2024. The temporary exemptions in the proposed final GM Clean Air Plan would not delay or postpone the predicted legal compliance date in Greater Manchester.

[16] Technical note 12: https://assets.ctfassets.net/tlpgbvy1k6h2/mRNFtuRf2wyt1G1viiqDr/673c71dbbc8df8dda0f2b519fb8b0645/12_-_GM_CAP_Evidence_of_the_impact_of_2021_implementation_of_a_CAZ_C__without_exemptions_.pdf

- **Changes to temporary exemptions should be broader in scope and longer**. Using the analysis from the Impacts of COVID-19 research as well as consultation feedback a number of temporary exemptions have been extended. This includes coach operators outside of Greater Manchester and all Greater Manchester licensed hackney carriages and Private Hire Vehicles, whilst the temporary exemption for LGVs remains in place. It is proposed that these remain in place until 31 May 2023. As long as the temporary local exemptions have been removed early enough that drivers will have had time to be influenced by the forthcoming CAZ charge, make their choices and obtain a new vehicle before 1st January 2024, then the temporary local exemptions would not affect the predicted legal compliance date. GM considers that the benefits of not charging users outweigh the disadvantages of doing so.

- **Charges for vans should be higher**: Client Earth considered that the charges for vans should be higher as this would lead to a greater behavioural response and therefore be more effective. They also made some comments about discrepancies between evidence published by GM; these are addressed specifically in the Response to Consultation Report[17]. In the updated modelling of the Policy following consultation, there is a proportion of the fleet that has been presumed not to upgrade in any event, as a result of the COVID-19 pandemic. With the impacts of COVID-19 and the post-consultation Policy, 79% of non-compliant LGVs are forecast to choose to upgrade in 2023 and 84% in 2025. Overall, this means that the vast majority of LGVs on the road would be compliant from 2023 onwards (around nine in ten by 2025). Such is the extent of the upgrade of the fleet that any further benefits from higher charges are likely to be minimal.

- **A number of concerns around how the CAZ will work, including payment, enforcement, tracking non-compliant vehicles**. The response explains the practicalities of how the CAZ will work, using an ANPR camera network, the Government's online payment portal. This did not raise any changes in how the CAZ would operate.

6.5 Funding to support upgrading non-compliant vehicles:

- **Oppose funding the upgrade of non-compliant vehicles**. The Response to Consultation Report explains the rationale around the funding to support the upgrade of non-compliant vehicles, including the feedback from vehicle owners responding to the consultation, who say that they need help to upgrade as they cannot afford it and that for some sectors, including the taxi and coach sectors, as COVID-19 has had a negative economic impact on their businesses.

- **Funding should target the oldest and most polluting vehicles as a priority.** The Response to Consultation Report explains that measures to target the upgrade of the oldest and/or most polluting vehicles have been considered throughout development of the GM CAP and are embedded within the proposals.

[17] Appendix 3 to this report

- **Concerns about affordability of upgrades and indebtedness and vehicle finance needing to be at or close to 0% interest rate to be affordable.** The Response to the Consultation Report explains the rationale around the funding to support the upgrade of non-complaint vehicles. In light of consultation feedback, adjustments have been proposed to the grant amounts and vehicle finance contributions available to owners or registered keepers of a number of vehicle types, to increase the amount of financial support available to applicants.

- **Access to funding needs to be fair**. Numerous points of feedback on how the funding should be distributed, including that it should be available for all owners of non-compliant vehicles. The Response to Consultation report explains that the proposals have been assessed throughout their development, including with respect to equalities impacts, and it is considered that they should provide access to the funding support for those likely to be most vulnerable to the GM CAZ charge and costs of upgrade.

- **All vehicles that operate in GM and will be affected should be eligible for funding including those beyond the boundary.** The policy now sets out that the Air Quality Administration Committee has the authority to consider possible changes to the eligibility criteria, including opening up the Funds to vehicle owners outside Greater Manchester.

- **Funding should be means tested.** Though the proposed eligibility criteria are not means tested, the criteria and process for releasing funding support is based on research and analysis of the potential socio-economic impacts of the GM CAZ, including the Distributional Impact Report. This indicated that the smallest businesses, organisations and individuals within GM are likely to be the most vulnerable to the CAZ requirements.

- **Funding should only be for voluntary sector and small businesses, funding should be prioritised for these groups.** The vehicle caps set in policy provide a mechanism to limit the maximum number of vehicles a single applicant can apply for funding to upgrade non-compliant vehicles. It mitigates the risk of oversubscription of the funds by larger businesses with larger fleets. The Clean Commercial Vehicle Fund eligibility criteria will ask applicants to demonstrate that they are either a small business, micro business/entity, self-employed/sole trader, an entity regulated by the Charity Commission (including registered, active charities and active charities exempted from registration); a social enterprise (including non-profit organisations); or a private owner (owner/registered keeper) of a non-compliant vehicle which are not used for commercial purposes.

- **Concerns about the management of vehicle funding and fraudulent applications**. The Response to Consultation Report explains that a range of appropriate measures have been embedded within the GM CAP to ensure transparency, tractability and robust management and administration of funding.

6.6 Other feedback

- **Concerns that the proposal would not improve air quality / reduce pollution**. Modelling shows that the proposed GM Clean Air Plan will encourage many older vehicles to be retrofitted or upgraded to cleaner vehicles, and that compliance across Greater Manchester will be met in the "shortest possible time" which is now by 2024.

- **Negative economic impacts on Greater Manchester**. This included concerns over increased prices of goods / services / fares being passed onto end consumers / passengers. The Economic Impacts Report and Equalities Impact assessment following the consultation has analysed the impacts on different groups within Greater Manchester. The mitigations put in place including changes to temporary exemptions and increased funding amounts.

7 THE GM CLEAN AIR FINAL PLAN

7.1 The review outlined in Section 6 has informed the proposed GM CAP Policy following Consultation. The policy, attached in full at Appendix 1, outlines the boundary, discounts, exemptions, daily charges of the Clean Air Zone as well as the financial support packages offered towards upgrading to a compliant vehicle, including the eligibility criteria and funding rounds to be applied.

7.2 Members are asked to note that this policy is to be agreed by the ten GM local authorities and that the GM Clean Air Charging Authorities Committee has the authority to make the Charging Scheme Order which establishes the GM Charging Scheme in line with the agreed policy.

7.3 The anticipated implementation date of the Clean Air Zone is Monday 30 May 2022[18] for Buses, HGVs and Hackney Carriages and Private Hire Vehicles licensed outside of Greater Manchester and from 1 June 2023 for LGVs, minibuses and coaches, and GM-licensed Hackney Carriages and Private Hire Vehicles.

7.4 Clean Air Zone

Clean Air Zone: Boundary	Primarily aligned with the administrative boundary of Greater Manchester Authorities excludes the Strategic Road Network (SRN)[19].The detailed boundary can be found here: cleanairgm.com/clean-air-zone-map/ Consultation to be undertaken on the inclusion of the A575 and A580 at Worsley[20].
Clean Air Zone: Times of Operation	24 hours a day, 7 days a week The anticipated implementation date is Monday 30 May 2022[18]
Clean Air Zone:	• Licensed Hackney Carriage

18 Subject to joint GM and JAQU agreement on overall 'readiness', including that the Central Charging Portal and national Vehicle Checker is' GM ready.

19 The SRN consists of roads which are not managed by local and regional GM authorities, namely motorways and trunk roads managed by Highways England. The SRN is illustrated on the Highways England Network Management Map available at: https://www.gov.uk/Government/publications/roads-managed-by-highways-england

20 Originally this section of the A575 and A580 at Worsley was excluded at consultation.

Vehicles Affected	• Licensed Private Hire Vehicle • Bus • Coach • Minibus • LGV • HGV

7.5 **Proposals for Licensed Hackney Carriages** – Government has awarded the ten GM local authorities £9.5m.

Clean Air Zone: Exemptions	All Hackney Carriages which are licensed to one of the ten Greater Manchester Authorities, as of the 3 December 2020 will be eligible for a temporary exemption until 31 May 2023.
Clean Air Zone: Discounts	None
Clean Air Zone: Daily Charge	£7.50 per charging day (midnight to midnight)
Clean Vehicle Funding	The following funding is available for upgrading a non-compliant Hackney Carriage to a purpose-built Wheelchair Accessible Vehicle (WAV): up to £5,000 towards retrofit to a compliant standard via a Clean Vehicle Retrofit Accreditation Scheme (CVRAS) certified system; OR up to £10,000 towards the running costs of a new purpose-built WAV Zero Emissions Capable (ZEC) vehicle. This option is available when the compliant vehicle acquired with GM CAP funds has also been eligible for a Government plug-in grant; OR up to £10,000 towards a second-hand purpose-built WAV ZEC vehicle; OR, up to up to £5,000 towards a compliant purpose-built WAV vehicle (Euro 4 petrol or Euro 6 diesel or better). The following funding is available for upgrading a non-compliant taxi to a non-Wheelchair Accessible Vehicle: up to £5,000 towards retrofit to a compliant standard via a Clean Vehicle Retrofit Accreditation Scheme (CVRAS) certified system; OR up to £6,000 towards the running costs of a new Zero Emissions Capable (ZEC) vehicle; OR up to £6,000 towards a second-hand ZEC vehicle; OR up to £3,000 towards a compliant vehicle (Euro 4 petrol or

	Euro 6 diesel or better) Limit of 5 vehicles per applicant. GM estimates that the funding of £9.5m, received from Government would provide funding to upgrade/retrofit around 1,130 vehicles.

7.6 **Proposals for Licensed Private Hire Vehicles** – Government has awarded the ten GM local authorities £10.2m.

Clean Air Zone: Exemptions	All Private Hire Vehicles which are licensed to one of the ten Greater Manchester Authorities, as of the 3 December 2020 will be eligible for a temporary exemption until 31 May 2023.
Clean Air Zone: Discounts	None
Clean Air Zone: Daily Charge	£7.50 per charging day (midnight to midnight)
Clean Vehicle Funding	The following funding is available for upgrading a non-compliant Private Hire Vehicle to a purpose-built Wheelchair Accessible Vehicle (WAV): up to £5,000 towards retrofit to a compliant standard via a Clean Vehicle Retrofit Accreditation Scheme (CVRAS) certified system; OR up to £10,000 towards the running costs of a new purpose-built WAV Zero Emissions Capable (ZEC) vehicle. This option is available when the compliant vehicle acquired with GM CAP funds has also been eligible for a Government plug-in grant; OR up to £10,000 towards a second-hand purpose-built WAV ZEC vehicle; OR, up to up to £5,000 towards a compliant purpose-built WAV vehicle (Euro 4 petrol or Euro 6 diesel or better). The following funding is available for upgrading a non-compliant taxi to a non-Wheelchair Accessible Vehicle: up to £5,000 towards retrofit to a compliant standard via a Clean Vehicle Retrofit Accreditation Scheme (CVRAS) certified system; OR up to £6,000 towards the running costs of a new Zero Emissions Capable (ZEC) ZEC vehicle; OR up to £6,000 towards a second-hand ZEC vehicle; OR up to £3,000 towards a compliant vehicle (Euro 4 petrol or

	Euro 6 diesel or better) Limit of 5 vehicles per applicant. GM estimates that the funding of £10.2m, received from Government would provide funding to upgrade/retrofit around 3,075 vehicles.

7.7 **Proposals for Buses** – Government has awarded the ten GM local authorities £14.7 million for bus retrofit and £3.2m for bus replacement.

Clean Air Zone: Exemptions	There will be permanent exemptions for Heritage buses (I.e. over 20 years old) not used for hire and reward and driver training buses. Buses used on a Greater Manchester school bus service tendered prior to March 2019 will have a temporary exemption that will end in July 2022.
Clean Air Zone: Discounts	None
Clean Air Zone: Daily Charge	£60 per charging day (midnight to midnight)
Clean Vehicle Funding	Bus retrofit - Up to £16,000 towards retrofit to a compliant standard via a Clean Vehicle Retrofit Accreditation Scheme (CVRAS) certified system £3.4m - Bus replacement - Up to £16,000 for purchase or lease of a compliant vehicle for up to medium size companies. The funding ask would provide funding to retrofit or towards upgrade of all non-compliant buses operating in GM, around 1,500 vehicles in total (noting that a further c350 are being retrofitted under the CBTF).

7.8 **Proposals for Coaches** – Government has awarded the ten GM local authorities £4.4 million as an initial tranche of funding.

Clean Air Zone: Exemptions	All coaches not running on a registered bus service will be eligible for a temporary exemption until 31 May 2023.
Clean Air Zone: Discounts	None
Clean Air Zone: Daily Charge	£60 per charging day (midnight to midnight)
Clean Vehicle Funding	A grant of £32,000 per vehicle for replacement OR access to vehicle finance. OR a grant of up to £16,000 towards retrofit to a compliant standard via a Clean Vehicle Retrofit Accreditation Scheme

	(CVRAS) Limit of 5 vehicles per applicant. Government have provided funding of £4.4m, which would provide funding to upgrade/retrofit around 174 vehicles.

7.9 **Proposals for Minibuses** – Government has awarded the ten GM local authorities £2 million.

Clean Air Zone: Exemptions	Community Minibuses – Those operating under a permit under section 19 or section 22 of the Transport Act (1985), issued by a body designated by the Secretary of State are eligible for a permanent exemption. Minibuses specially adapted for a disabled user will be permanently exempted. Minibuses will be eligible for a temporary exemption until 31 May 2023.
Clean Air Zone: Discounts	None
Clean Air Zone: Daily Charge	£10 per charging day (midnight to midnight)
Clean Vehicle Funding	A grant of £5,000 per vehicle to replace or retrofit their vehicle OR access to vehicle finance, offering an average subsidy of £5,000, with the subsidy per vehicle capped at £7,000. Government has provided £2m in funding, which would provide funding to upgrade around 380 vehicles.

7.10 **Proposals for LGV** – the ten GM local authorities have been awarded £70 million to support LGV owners to upgrade or retrofit their vehicles.

Clean Air Zone: Exemptions	Light Goods Vehicles (LGVs) will be eligible for a temporary exemption until 31 May 2023. LGVs specially adapted for a disabled user will be permanently exempted.
Clean Air Zone: Discounts	None
Clean Air Zone: Daily Charge	£10 per charging day (midnight to midnight)
Clean Vehicle Funding	A grant of £3,500 for replacement of LGVs under 1.6t per vehicle OR access to vehicle finance, offering an average subsidy of £3,500, with the subsidy per vehicle capped at £5,000. A grant of £4,500 for replacement of LGVs over 1.6t and up to 3.5t per vehicle OR access to vehicle finance, offering an

	average subsidy of £4,500. A grant of £5,000 for retrofit of LGVs. This would be limited to 5 vehicles per applicant. The £70 million funding would provide funding to upgrade/retrofit around 15,900 vehicles.

7.11 **Proposals for HGV** – Government has awarded the ten GM local authorities £7.6m.

Clean Air Zone: Exemptions	Specialist Heavy Goods Vehicles – Certain types of heavily specialised HGVs, such as those used in construction or vehicle recovery. Non-road-going vehichles – Certain types of non-road going vehicles which are allowed to drive on the highway such as agricultural machines; digging machines; and mobile cranes (T1, T2 or T3 vehicle types)
Clean Air Zone: Discounts	All vehicles classified under the Private HGV tax class to be eligible for a dischounted charge of £10 per day.
Clean Air Zone: Daily Charge	£60 per charging day (midnight to midnight)
Clean Vehicle Funding	A grant of up to : <7.5t £5,000 <18t £7,000 <26t £9,000 <32t £12,000 <44t £6,500 per vehicle, dependent on vehicle size OR access to vehicle finance. OR a grant of up to £16,000 towards retrofit to a compliant standard via a Clean Vehicle Retrofit Accreditation Scheme (CVRAS) This would be limited to 5 vehicles per applicant. The Government fund received of £7.6m would provide funding to upgrade around 798 vehicles.

7.12 Air Quality Modelling of final GM CAP

7.12.1 The core goal of the GM Clean Air Plan is to achieve compliance with the legal Limit Value (40 µg/m^3) for NO_2 at locations identified through the target determination process within Greater Manchester in the "shortest possible time" in line with Government guidance.

7.12.2 The Modelling report of the local plan Policy following consultation can be found in Appendix 6. The modelling has been updated to use the latest information from the updated package and using updated assumptions from the impact of COVID-19 research and other information. The methodology has been agreed with government.

7.12.3 The modelling outputs of the scheme show the achievement of Nitrogen Dioxide compliance within Greater Manchester in 2024 as required by the Ministerial Direction which is the shortest possible time within which it can be achieved.

7.12.4 Appendix 9 sets out how the current proposals meet the requirements of the latest Ministerial Direction in March 2020[21].

7.13 Equalities Impact Assessment following consultation

7.13.1 Under equality legislation, there is a requirement to have due regard for the need to:

- Eliminate unlawful discrimination, harassment and victimisation
- Advance equality of opportunity between persons who share a relevant protected characteristic, and persons who do not share it
- Foster good relations between those who have a relevant protected characteristic and those who don't.

7.13.2 Relevant protected characteristics in relation to the GM Clean Air Plan are considered to be age; disability; gender reassignment; pregnancy and maternity; race; religion or belief; sex and sexual orientation.

7.13.3 The analysis of potential disproportionate or differential impacts of the proposed GM Final Clean Air Plan are set out in the GM CAP Equality Impact Assessment following Consultation at Appendix 2.

7.13.4 The assessment concludes that improved air quality resulting from the GM CAP will have a disproportionate benefit for many protected characteristic groups namely, pregnancy and maternity; older people, young people and children; those with disability or ill-health; and those from minority ethnic and faith groups who are more likely to live in deprived neighbourhoods.

[21] The ministerial direction can be found here: https://democracy.manchester.gov.uk/documents/s18580/Appendix%202%20-%20Greater%20Manchester%20NO2%20Plan%20Direction.pdf

7.13.5 It also concludes that, despite the proposed package of mitigating measures, there is the risk of residual adverse impacts on some protected characteristic groups in relation to personal and business affordability: gender (male drivers), minority ethnic and faith groups. A potential, residual adverse impact in relation to accessibility was also concluded for those with protected characteristics older and young people; disability; gender reassignment and sexual orientation.

7.13.6 Overall, the assessment recognises that a significant package of temporary and permanent exemptions, discounts and funds has been put in place and that these have reduced the potential negative impact on protected characteristic groups. Having regard to the benefits of the GM CAP the proposals are considered to be justified not withstanding the remaining risk of disproportionate or differential impacts on protected characteristic groups.

7.13.7 Promotion and accessibility of the mitigating measures to protected characteristic groups will be key to ensuring that those impacted are fully aware of and able to benefit from the support available.

7.13.8 To fulfil their duty under the Equality Act, each of the ten GM local authorities has undertaken a local assessment and reported any significant variances against the GM-wide assessment, the supporting GM CAP Equality Impact Evidence report and the ten local authority assessments can be found in Appendix 2.

7.14 **Assessment of potential Economic Implications following consultation**

7.14.1 The potential implications of the GM CAP on the economy of Greater Manchester have been considered in the Economic implications of the CAP Report (see Appendix 7). The report sets out:

- **The economic implications of Clean Air Zones.** This section explains the potential reduction in early deaths, reduced time spent in hospitals and increase in the number of hours worked, leading to a positive economic benefit for GM. However, there are some direct costs to non-compliant vehicle owners as well as broader costs and behavioural changes. This may include upgrading vehicles, changes in travel habits and potential changes in demand.

- **The assessment of economic implications of the GM Clean Air Plan pre-COVID-19**; the background to the process undertaken which all took place before the pandemic; including the development of the Outline Business Case using the Government's framework, and the assessment of the plans using the Government's guidance including primary and secondary success criteria. It explains the rationale for each of the measures proposed for consultation.

- **The wider impacts and the economic implications of COVID-19 on GM and the UK**; this provides a summary of the economic implications of COVID-19 on the United Kingdom, explaining employment rates and the support provided to businesses. It also explains the feedback provided in the consultation on Greater Manchester businesses' experiences, including lower turnover, increased debt and delays to investment (including vehicle upgrades). It also summarises ONS data around the sectors most affected, and then explains the results of the vulnerability assessment for sectors with Coaches, Minibuses, HGVs and LGVs post-COVID-19.

- **The revisions to the GM Clean Air Plan to take into account the impact of COVID-19**. This section explains the changes to the proposals, as well as how they mitigate the adverse impacts of the GM Clean Air Plan.

7.14.2 The report concludes that whilst there is still uncertainty around individual circumstances and the wider UK economy, the analysis of the impacts of COVID-19 alongside the development of the updated GM Clean Air Plan measures supports the case for a Hardship Fund. As outlined above Government have not awarded Greater Manchester Hardship funding. Further funding to address potential cases of hardship may well be needed and the Greater Manchester Authorities will be monitoring the situation very closely to ensure that they can take up the Government's offer to review the need for further funding if the need can be objectively demonstrated.

7.15 Distribution of Funding

7.15.1 The Air Quality Administration Committee has the authority to establish the funds and distribute the funds to support those businesses, individuals and organisations who need to upgrade their vehicle to become compliant in line with the agreed policy.

7.15.2 It is envisaged that owners of non-compliant vehicles will be able to apply for funding to support their vehicle upgrades in November 2021.

7.15.3 Information on the funding options available to upgrade to a compliant vehicle will be available on cleanairgm.com. This will include information on eligibility criteria and how to apply for funding.

7.15.4 Those wishing to apply will set up a secure online account and provide the necessary information to submit an application for funding. This includes providing data about themselves, their vehicle and their business and these details are verified through a series of validation checks.

7.15.5 Following a successful eligibility assessment and acceptance of the Terms and Conditions of funding, the Applicant will be provided with a funding award notification, which will set out the funding options available to them. At this stage, the Applicant would then be able to explore the funding opportunities available to them.

7.15.6 With the exception of the Clean Bus Fund and running cost grants under the Clean Taxi Fund, which are paid to the Applicant, all funds are paid directly through accredited suppliers of retrofit and replacement upgrade options, to ensure a comprehensive audit trail, accountability for public funding and to reduce the risk of fraudulent activity. Trade in of the non-complaint vehicle is mandatory.

8 NEXT STEPS

8.1 Officers will:

- Continue to undertake the preparatory implementation and contract arrangements that need to be undertaken to deliver the CAZ and other GM CAP measures.
- Prepare a consultation on the inclusion of motorhomes classified as MSP1 and the A575 and A580 at Worsley in the GM Clean Air Zone.
- Make arrangements to distribute funds to support those businesses, individuals and organisations who need to upgrade their vehicle to become compliant.
- Prepare FBC documentation for submission to the Government's Joint Air Quality Unit (JAQU).
- Work with JAQU and Highways England to establish the most appropriate solution for the charging mechanism to be applied to the section of A57/A628 on the Strategic Road Network.
- Prepare the CAP monitoring and evaluation plan – This will take account of the fact that in May 2016 a single Air Quality Management Area (AQMA) was declared for Greater Manchester based on the modelling of nitrogen oxides emissions. The Greater Manchester Air Quality Action Plan sets out the measures which will reduce air pollution within Greater Manchester's AQMAs. An Annual Status Report (ASR) provides updates on progress of all actions included within the Greater Manchester Air Quality Action Plan (2016-2021) (AQAP). DEFRA has responded positively to GM's suggestion that the update of the AQAP, and any remodelling of the Air Quality Management Area (AQMA), should be postponed until the air quality impact of the proposed GM-wide Clean Air Zone to address roadside NO_2 has been fully understood as part of the GM CAP monitoring and evaluation plan.

9 Financial Implications

9.1 Although Sections 3.2 and 3.3 of the report highlight initiatives where the Government's funding offer is lower than GM's request, it remains the case that all capital and revenue development and delivery costs associated with the Clean Air Zone are expected to be covered by this funding. Clean Air Zone charges have a planned implementation date of 30 May 2022. These charges are expected to cover the operating costs of the Clean Air Zone. This is in line with the Initial Financial Case, as set out in Clean Air Plan Outline Business Case dated March 2019.

9.2 Based on Section 7 of the report, funds available for upgrading or retrofitting vehicles total £121.6m across the Greater Manchester Combined Authority area. A breakdown of available funding by vehicle class is shown in the following table.

Vehicle Class	Para	Funding £000
Licensed Hackney Carriages	7.5	9,500
Licensed Private Hire Vehicles	7.6	10,200
Buses	7.7	17,900
Coaches	7.8	4,400
Minibuses	7.9	2,000
Light Goods Vehicles	7.10	70,000
Heavy Goods Vehicles	7.11	7,600
Total		**121,600**

9.3 The GM Air Quality Administration Committee has the authority distribute these funds to support those businesses, individuals and organisations who need to upgrade their vehicle to become compliant in line with the agreed policy.

9.4 The Council is reviewing the impact of Clean Air Zone charges on its directly operated transport fleet and seeking to mitigate the impact by replacing or upgrading vehicles as part of the fleet replacement programme. Should Clean Air Zone charges give rise to an additional budget pressure, this will need to be reflected in the 2022/23 Revenue Budget and Medium Term Financial Strategy.

(James Postle)

10 Legal Services Comments

10.1 Legal issues are addressed in the body of the report and at Appendix 9 (Colin Brittain)

11 Co-operative Agenda

11.1 The work is being undertaken through collaboration of the 10 GM authorities supported by Transport for Greater Manchester.

12 Human Resources Comments

12.1 N/A

13 Risk Assessments

13.1 A full risk log supports the various projects which form part of the full programme currently under development.

14 IT Implications

14.1 N/A

15 Property Implications

15.1 N/A

16 **Procurement Implications**

16.1 N/A

17 Environmental and Health & Safety Implications

17.1 Cleaner air is supported for all through the proposals being drafted.

18 Equality, community cohesion and crime implications

18.1 N/A

19 Equality Impact Assessment

19.1 A full EIA is planned to take account of the impact of all the measures proposed.

20 Key Decision

20.1 Yes

21 Key Decision Reference

21.1 NC-04-21

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1 APPENDIX 1 – GM CAP POLICY FOLLOWING CONSULTATION

1.1 Attached as a supplementary paper.

2 APPENDIX 2 – GM CAP EQUALITY IMPACT ASSESSMENT FOLLOWING CONSULTATION

2.1 Attached as a supplementary paper.

3 APPENDIX 3 – AECOM CONSULTATION REPORT

3.1 Attached as a supplementary paper.

4 APPENDIX 4 – RESPONSE TO THE CONSULTATION

4.1 Attached as a supplementary paper.

5 APPENDIX 5 – IMPACTS OF COVID-19 REPORT

5.1 Attached as a supplementary paper.

6 APPENDIX 6 – AIR QUALITY MODELLING REPORT FOLLOWING CONSULTATION AND WITH COVID-19 IMPACTS

6.1 Attached as a supplementary paper.

7 APPENDIX 7 – ECONOMIC IMPLICATIONS OF CAP FOLLOWING CONSULTATION AND WITH COVID-19 IMPACTS

7.1 Attached as a supplementary paper.

8 APPENDIX 8 – OTHER CITIES' CLEAN AIR PLANS

8.1 Attached as a supplementary paper.

9 APPENDIX 9 – COMPLIANCE WITH THE SECRETARY OF STATE'S DIRECTION

9.1 Attached as a supplementary paper.

10 APPENDIX 10 – CLEAN AIR ZONE ANPR AND SIGNAGE LOCATIONS

10.1 Attached as a supplementary paper.

Greater Manchester's Clean Air Plan to Tackle Nitrogen Dioxide Exceedances at the Roadside

Appendix 1 - GM Clean Air Plan Policy following Consultation

Warning: Printed copies of this document are uncontrolled

Version Status:	DRAFT FOR APPROVAL	**Prepared by:**	Transport for Greater Manchester on behalf of the 10 Local Authorities of Greater Manchester
Date:	20 June 2021		

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DRAFT FOR APPROVAL

1 Purpose of this Document

1.1 Government has instructed many local authorities across the UK to take quick action to reduce harmful Nitrogen Dioxide (NO_2) to within legal limit values in the "shortest possible time". The Secretary of State has issued a direction to the 10 local authorities in Greater Manchester in March 2020 that requires them to take steps to implement the local plan for NO_2 compliance, so that compliance with the legal limit for nitrogen dioxide is achieved in the shortest possible time, and by 2024 at the latest, and so that exposure to levels above the legal limit for nitrogen dioxide are reduced as quickly as possible. That local plan involves a Charging Clean Air Zone Class C with additional measures. The direction also required the submission of an interim full business case to the Secretary of State once any necessary public consultation had been completed in respect of the scheme.

1.2 In Greater Manchester, the 10 local authorities, the Greater Manchester Combined Authority (GMCA) and Transport for Greater Manchester (TfGM), collectively referred to as "Greater Manchester" or "GM", have worked together to develop a Clean Air Plan to tackle NO_2 Exceedances at the Roadside, referred to as the GM CAP.

1.3 This is the GM CAP Policy. This document:

- sets out the policy for each of the measures, which together constitute the GM CAP, namely:
    - Greater Manchester Charging Clean Air Zone (Section 2)
    - Clean Bus Fund (Section 6)
    - Vehicle Finance (Section 7)
    - Clean Commercial Vehicle Fund (Section 8)
    - Clean Taxi Fund (Section 9)
- includes reference to specific technical materials which are published as part of the evidence base for the GM CAP.
- does not and is not intended to provide detailed information on the processes that underpin the delivery of the Policy for the GM CAP, e.g. how discounts and exemptions are applied for. Relevant information is available at: cleanairgm.com/clean-air-plans.

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1.4 The policy set out within this document takes into account the responses received in the GM CAP Consultation held between 8th October and 3rd December 2020. It also reflects the findings of the further analysis that has been undertaken, including examining the impact of COVID-19 and the economic implications report of the GM CAP. The Consultation provided an opportunity for all those with an interest in the GM CAP to provide feedback on the proposals. More detail on the Consultation can be found in the AECOM[1] Consultation Report, which, along with the GM Authorities' Responses to the Consultation, are both appendices in the June 2021 GMCA report.

DRAFT FOR APPROVAL

[1] AECOM are the independent agency that managed and analysed the GM CAP consultation responses.

2 Greater Manchester Charging Clean Air Zone (GM CAZ)

2.1 The 10 local authorities in GM have been directed by the Government to introduce a charging Clean Air Zone Class C across the region[2]. This means that, for the following vehicle types, if the vehicle does not comply with the vehicle emission standards in the Government's Clean Air Zone Framework[3] it is a requirement to pay a daily charge for driving within the zone:

- Buses
- Coaches
- Heavy Goods Vehicles (HGVs)
- Light Goods Vehicles (LGVs)
- Minibuses
- Licensed Hackney Carriages
- Licensed Private Hire Vehicles (PHVs)

2.2 The CAZ vehicle categories and minimum emission standards as set out in the Clean Air Zone Framework[4] are provided in **Appendix A**. Vehicles which meet the emissions standards are not subject to charges. A Clean Air Zone Class C does not include private cars and motorbikes.

2.3 A central government database (the Government vehicle checker) will determine if a vehicle is in scope for a charge. This vehicle checker is primarily linked to the Driving and Vehicle Licensing Agency (DVLA) database holding information on the classification of vehicles (often found on a V5C document). The vehicle checker can be accessed online at: gov.uk/check-clean-air-zone-charge. Any queries relating to the classification of vehicles are a matter for the registered keeper[5] and the DVLA.

2.4 The GM CAZ will be implemented through a Joint Local Charging Scheme Order[6] with charging anticipated to commence on 30th May 2022[7].

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[2] In July 2019, a ministerial direction under the Environment Act 1995, the Environment Act 1995 (Greater Manchester) Air Quality Direction 2019 was made, which requires all ten of the Greater Manchester (GM) local authorities to implement a charging Clean Air Zone Class C across the region. In March 2020, this was superseded by a further ministerial direction, the Environment Act 1995 (Greater Manchester) Air Quality Direction 2020 was made, requiring all ten of the Greater Manchester (GM) local authorities to implement a charging Clean Air Zone Class C across the region so that: a. compliance with the legal limit value for nitrogen dioxide is achieved in the shortest possible time and by 2024 at the latest; and, b. exposure to levels above the legal limit value for nitrogen dioxide are reduced as quickly as possible.
The Environment Act 1995 (Greater Manchester) Air Quality Direction 2019 is available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/817395/air-quality-direction-greatermanchester.pdf
The Environment Act 1995 (Greater Manchester) Air Quality Direction 2020 is available at: https://democracy.greatermanchesterca.gov.uk/documents/s8753/Appendix%202%20-%20200316%20Greater%20Manchester%20NO2%20Plan%20Direction.pdf

[3] Department for Environment, Food & Rural Affairs and Department for Transport. 2020. Clean Air Zone Framework. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/863730/clean-air-zone-framework-feb2020.pdf

[4] Department for Environment, Food & Rural Affairs and Department for Transport. 2020. Clean Air Zone Framework, Annex A – Clean Air Zone minimum classes and standards. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/863730/clean-air-zone-framework-feb2020.pdf

[5] The "registered keeper" means: (i) in relation to a vehicle registered in the United Kingdom, the person in whose name the vehicle is registered under the Vehicle Excise and Registration Act 1994; or (ii) in relation to any other vehicle, the person by whom the vehicle is kept;

[6] Secondary legislation which empowers traffic authorities to charge road users, in accordance with the Transport Act 2000.

[7] Subject to joint GM and JAQU agreement on overall 'readiness', including that the Central Charging Portal and national Vehicle Checker is 'GM ready'.

2.5 It is anticipated that, once implemented, the Clean Air Zone will remain in full operation until at least the second half of 2026. In accordance with Government advice, if it is demonstrated by the second half of 2026 that two consecutive years' of compliance with the legal limit value for NO_2[8] has been met, and there is confidence that compliance will continue to be maintained then, subject to GM governance processes, the local authorities will notify the Secretary of State of their intention to revoke the Charging Scheme Order and decommission the GM CAZ.

2.6 Transport for Greater Manchester is to be responsible for day-to-day operation of the GM CAZ.

2.7 **Table 1** provides a summary of the key characteristics of the proposed GM CAZ.

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[8] The EU Ambient Air Quality Directive set the Legal Limit value of an annual mean of 40ug/m3, which was transposed into UK legislation under the Air Quality Standards Regulations 2010. The requirement to meet compliance with the legal limit is set out by the Environment Act 1995 (Greater Manchester) Air Quality Direction 2020. Under this direction the GM Authorities are obliged to meet the Legal Limit.

Table 1: Key Characteristics of the GM CAZ

Clean Air Zone: Boundary	Primarily aligned with the administrative boundary of Greater Manchester Authorities, excludes the Strategic Road Network (SRN)[9]. cleanairgm.com/which-roads-are-affected/
Clean Air Zone: Times of Operation	24 hours a day, 7 days a week
Clean Air Zone: Vehicles Affected[10]	Buses Coaches HGVs LGVs Minibuses Licensed Hackney Carriages Licensed Private Hire Vehicles
Clean Air Zone: Exemptions	Certain vehicle types eligible for exemptions as detailed in section 2.8
Clean Air Zone: Discounts	Certain vehicle types eligible for discounts as detailed in section 2.8
Clean Air Zone: Daily Charges	Daily charges apply for each day a non-compliant vehicle is used within the GM CAZ, with one charge imposed per vehicle, per 'Charging Day' (midnight to midnight), however much a vehicle drives within the GM CAZ in that 24-hour period. • Buses – £60 per 'Charging Day' • Coaches – £60 per 'Charging Day' • HGVs - £60 per 'Charging Day' • LGVs - £10 per 'Charging Day' • Minibuses – £10 per 'Charging Day' • Licensed Hackney Carriages – £7.50 per 'Charging Day' • Licensed Private Hire Vehicles – £7.50 per 'Charging Day' The relevant charge is to be paid via a Central Government Payment Portal for non-compliant vehicles used within the GM CAZ. The Government portal allows a user to pay 6 days before the day of travel (Charging Day), any time on the day of travel (Charging Day), or, 6 days following the day of travel (Charging Day).
Penalty for non/late payment of CAZ charge	£120 (in addition to the daily charge) will be applied to all relevant vehicles (reduced to £60 plus the daily charge if paid within 14 days of Penalty Charge Notice being issued)

[9] i.e. roads for which the Secretary of State is the highway authority (as opposed to roads which are managed by local traffic authorities), namely motorways and trunk roads managed by Highways England. The SRN is illustrated on the Highways England Network Management Map available at: https://www.gov.uk/government/publications/roads-managed-by-highways-england

[10] Further detail on the vehicles affected is available in Appendix A.

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2.8 **Discounts and Exemptions** – The Government's Clean Air Zone Framework[3] has a general presumption that the requirements for charging CAZs will apply to all vehicles according to the relevant zone class, but it also recognises that there are certain circumstances where discounts or exemptions from a charge may be appropriate.

2.8.1 It is the responsibility of the owner/registered keeper of a vehicle to apply for discounts and exemptions where an application is required. Where GM is using an existing database to identify exempted vehicles, it is the responsibility of the owner/registered keeper of a vehicle to ensure their information held with the relevant agencies, e.g. DVLA, is up to date and accurate.

2.8.2 The Framework sets out the national permanent exemptions (those vehicles which are exempt from charges for all CAZs including the GM CAZ). These are provided for some types of vehicle which are particularly difficult or uneconomic to adapt to comply with the Framework's requirements. They also cover vehicles that are engaged in particularly unique or novel operations.

2.8.3 National permanent exemptions that apply to all CAZs are set out in **Table 2** along with the Government's rationale for each of them**.**

Table 2: Permanent Exemptions to CAZ Charges, set by the Government

Permanent exemptions	Description	Rationale	Further Information
Historic vehicles	Vehicles within the DVLA Historic Vehicle Tax Class[11] (vehicles built or first registered more than 40 years ago)	Exempt due to age and unsuitability for compliant retrofitting	A database of these nationally exempt vehicles is managed via the Central Government Payment Portal, so vehicles are automatically exempt with no additional action required by the owner or registered keeper.
Military vehicles	Vehicles in use by UK Armed Forces	Exempt from charges by virtue of Section 349 of the Armed Forces Act 2006	
Disabled Passenger Vehicle	Vehicles within the DVLA Disabled Passenger Vehicle Tax Class, used by organisations providing transport for disabled people.	This group of vehicles may include a range of specialist and/or novel or adapted vehicles, where it may generally not be practical to upgrade to a vehicle compliant with the emission standards of the GM CAZ.	
Specialist Emergency Service Vehicles	Specialist vehicles in use by emergency services, such as aerial ladders and major incident command vehicles.	This group of vehicles may include a range of specialist and/or novel or adapted vehicles where it may generally not be practical to upgrade to a vehicle compliant with the emission standards of the GM CAZ.	A locally managed database of vehicles exempted has been developed in liaison with emergency services.

[11] Information on tax classes for vehicles is available at: https://www.gov.uk/government/publications/v3551-notes-about-tax-classes

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2.8.4 In addition to stipulating national exemptions, the Government's Clean Air Zone Framework[3] makes provision for local authorities to consider allowing additional exemptions or discounts based on particular local circumstances, specifically highlighting the need to liaise with emergency services operating in the area to understand the type of vehicles in their fleets and the activities for which they are used. Further local exemptions and discounts can be proposed on this basis so long as they do not undermine the ability to achieve compliance with the relevant legal limits on nitrogen dioxide in the shortest possible time.

2.8.5 GM has provided local exemptions and discounts, which fall into three categories:

- Permanent local exemptions (set out in **Table 3**);
- Temporary local exemptions[12] (set out in **Table 4**); and
- Permanent local discounts (set out in **Table 5**).

2.8.6 Tables 3, 4 and 5, below, set out the local discounts and exemptions which will apply to the GM CAZ. The descriptions set out relate to UK-based vehicles. Non UK-based vehicles which, were they registered as UK-based vehicles, would meet the relevant discount or exemption description, are also eligible to apply for an discount or exemption, save where the nature of the discount or exemption is inherently local (e.g. GM-licensed taxis) or UK-based (e.g. vehicles used by the emergency services). Non UK-based vehicles will always need to make an application to benefit from any discount or exemption.

2.8.7 Further detail on discounts and exemptions, including how to apply (where applicable) can be found at: cleanairgm.com/clean-air-plans.

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[12] A temporary local exemption is a time limited exemption, applied for a fixed period. Within this temporary local exemption period, eligible vehicles would not pay a charge. Following the expiry of a temporary local exemption, non-compliant vehicles are charged. Note there may be a requirement to apply for discounts and exemptions.

Table 3: Permanent local exemptions

Permanent local exemptions	Description	Rationale	Further Information
Specialist Heavy Goods Vehicles	Certain types of heavily specialised HGVs, such as certain vehicles used in construction or vehicle recovery. The following are eligible to apply for exemption: • Vehicles in the DVLA Special Types Tax Class[13] and specified in an Order under Section 44 of the Road Traffic Act 1994; • Vehicles in the DVLA Special Vehicles Tax Class and meeting the definition of a "special vehicle" under Part IV of Schedule 1 of the Vehicle Excise and Registration Act 1994 (VERA); • Vehicles in the DVLA Recovery Vehicle Tax Class and meeting the definitions and criteria in Part V of Schedule 1 of the VERA; • Vehicles in the DVLA Special Concessionary Tax Class and meeting the definitions and criteria in paragraphs 20B, 20C, 20D, 20E, 20F, 20H or 20J of Schedule 2 of the VERA. • Vehicles in the DVLA Limited Use Tax Class and meeting the definition and criteria in paragraph 20A of Schedule 2 of the VERA.	This group of vehicles includes certain novel or adapted road going HGVs of a particularly specialised nature, meaning it may not be practical to upgrade to a vehicle compliant with the emission standards of the GM CAZ.	Owners or registered keepers of specialist HGVs need to apply for this exemption, as there is no national database of these vehicles.

[13] Information on tax classes for vehicles is available at: https://www.gov.uk/government/publications/v3551-notes-about-tax-classes

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Permanent local exemptions	Description	Rationale	Further Information
Non-road-going vehicles	Certain types of non-road going vehicles which are allowed to drive on the highway such as agricultural machines; digging machines; and mobile cranes.	This group of vehicles includes a range of specialist and/or novel or adapted vehicles, where it may generally not be practical to upgrade to a vehicle compliant with the emission standards of the GM CAZ.	A database of these nationally exempt vehicles is managed via the Central Government Payment Portal, so vehicles are automatically exempt with no additional action required by the owner or registered keeper.
Vehicles used by emergency services	Certain types of vehicles used by emergency services front line emergency and certain non-emergency vehicles.	This group of vehicles includes a range of vehicles, associated with front line emergency response, and where it may generally not be practical to upgrade to a vehicle compliant with the emission standards of the GM CAZ, which are not captured by the national exemption.	A GM managed database of vehicles exempted has been developed in liaison with emergency services.
Community minibuses	Those operating under a permit under section 19 or section 22 of the Transport Act (1985), issued by a body designated by the Secretary of State.	These vehicles provide important access to employment, education and training for people who may otherwise be isolated, including those with mobility issues and located in areas with poor public transport accessibility. They also facilitate inclusion in social and community activities.	Owners or registered keepers of community minibuses need to apply for this exemption, as there is no national database of these vehicles.
Showmen's vehicles	Fairground/funfair vehicles which are registered with the Showmen's Guild, in the tax classification of Showman's HGV or Showman's Haulage under the DVLA Special Vehicles Tax Class and meet the definition of a 'showman's vehicle' or a 'showman's goods vehicle' within the meaning of section 62 of the VERA.	This group of vehicles includes a range of specialist and/or novel or adapted vehicles, where it may generally not be practical to upgrade to a vehicle compliant with the standards of the GM CAZ.	GM will need to be notified of the vehicles eligible for exemption registered with the Showmen's Guild, as there is no national database of these vehicles.

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Permanent local exemptions	Description	Rationale	Further Information
Driving within the zone because of a road diversion	Vehicles driving within the zone because of a road diversion who would otherwise not have entered the GM CAZ. Applies only while the diversion is active and subject to non-compliant vehicles being on the designated diversion route.	This exemption is aimed at protecting road safety and recognises that vehicles may enter the GM CAZ for reasons outside of the driver's control. The exemption will apply to vehicles which enter the GM CAZ as a direct result of a road diversion only.	No additional action is required by the owner or registered keeper of a non-compliant vehicle driving on a diversion route who would otherwise not have entered the GM CAZ.
Disabled Tax Class vehicles	Vehicles used by, or for the purposes of a disabled person which are exempt from vehicle tax, i.e. those in the DVLA Disabled Tax Class and meeting the definitions and criteria in paragraphs 18 and 19 of Schedule 2 of the VERA are eligible to apply for exemption.	This exemption is complementary to the exemption for Disabled Passenger Vehicles. An exemption certificate will have been secured for vehicles within this group, following a successful application to the Driver and Vehicle Licensing Authority (DVLA) for exemption from vehicle tax. The vehicle must be used solely for the purposes of the disabled person.	A database of these vehicles is managed via the Central Government Payment Portal, so vehicles are automatically exempt with no additional action required by the owner or registered keeper.
LGVs and minibuses adapted for a disabled user	LGVs and Minibuses specifically adapted for use by a disabled user and not used for hire or reward. These vehicles will have a substantial and permanent adaptation to the vehicle, specific to suit a disabled wheelchair user's particular needs to enable them to travel in the vehicle, or enter and drive it[14].	This exemption recognises privately owned LGVs and Minibuses specially adapted for use by a disabled user, which are not covered by the Disabled Tax Class exemption. The exemption is subject to restrictions on its use through eligibility criteria to ensure it is used primarily for the transport of a disabled	Owners or registered keepers of eligible LGVs and Minibuses adapted for a disabled user need to apply for this exemption, as there is no national database of these vehicles. The decision on whether to grant the exemption to the Applicant rests with TfGM in its total discretion.

[14] The definition of substantial and permanent adaptation draws on guidance from HMRC that: The adaptation to the vehicle must be both necessary and specific to suit the disabled wheelchair user's particular needs to enable them to travel in the vehicle, or enter and drive it. The adaptation should alter the vehicle in a meaningful way, enabling the wheelchair user to use the vehicle which they could not use before it was adapted. For a vehicle to be considered as substantially and permanently adapted it is expected that significant change to the vehicle has been made with the adaptations being bolted or welded to the body or chassis of the vehicle. Adaptations that are wired into the electrics of the vehicle could also qualify as substantially and permanently adapted. For adaptations to be considered permanent it's expected that they should be fitted to the vehicle for the shorter of either a minimum of 3 years or the lifetime of the vehicle. If the adaptation is removed before this time, then the adaptation may not be (continued p11)

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Permanent local exemptions	Description	Rationale	Further Information
		person and is not used for hire or reward.	
Driver training buses	Buses adapted for use for, and dedicated to, driver training purposes and owned by the Applicant prior to 3rd December 2020.	This exemption recognises specially adapted buses for dedicated use as driver training vehicles, which are specialist and/or novel or adapted vehicles, where it may generally not be practical to upgrade to a vehicle compliant with the standards of the GM CAZ.	A GM managed database of vehicles eligible to be exempted has been developed in liaison with bus operators, as there is no national database of these vehicles. No additional vehicles can be added to the list once established and any replacement training buses will need to be compliant or pay a charge.
Heritage buses not used for hire or reward	Heritage buses which are over 20 years old and which are not used for hire or reward.	This exemption recognises privately owned heritage buses over 20 years old that do not fall within the Historic Vehicle Tax Class, which are specialist and/or novel or adapted vehicles, where it may generally not be practical to upgrade to a vehicle compliant with the standards of the GM CAZ. The exemption is subject to restrictions on its use through eligibility criteria to ensure the vehicle is not used for hire or reward.	Owners or registered keepers of eligible heritage buses will need to apply for this exemption, as there is no national database of these vehicles. The decision on whether to grant the exemption to the Applicant rests with TfGM in its total discretion.

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considered to be permanent and therefore the vehicle should not have been eligible for exemption. A disabled person who usually uses a wheelchair needs to be able to take it with them in the vehicle. Vehicles often need to be substantially adapted to allow a fixed frame or motorised wheelchair designed for permanent use to be transferred into the vehicle, using a ramp and a winch or a hoist, and for it to be held safely and securely in place throughout the journey. Where a wheelchair can be folded and stowed in the boot of a vehicle, the vehicle does not need to be substantially and permanently adapted to carry it. Whilst some minor adaptations may be required, it's not sufficient to meet the 'substantially and permanently adapted' qualifying condition and the vehicle will not qualify for exemption. The following are not considered as substantial and permanent adaptations because they are widely available accessories or upgrade options the: fitting of a roof rack or standard roof box; attachment of a trailer to the back of a vehicle; fitting of automatic transmission; fitting of parking or reversing sensors. This list is not exhaustive. Further information available at: https://www.gov.uk/guidance/vat-relief-on-adapted-motor-vehicles-for-disabled-people-and-charities-notice-1002#sec3

Table 4: Temporary local exemptions

Temporary local exemptions	Description	Rationale	Further Information
LGVs and minibuses (which are not a licensed hackney or PHV or used on a registered bus service within GM)	Light Goods Vehicles (LGVs) and minibuses which are not used as a licensed hackney, PHV or on a registered bus service within GM, are eligible for a temporary exemption until 31st May 2023. After 31st May 2023, non-compliant vehicles will be charged.	GM evidence indicates that the cost and availability of new, second and third hand compliant LGVs will not provide a viable or an affordable option for many operators (especially for the smallest businesses and sole traders) to upgrade to a compliant vehicle in 2022, given the scale of the GM CAZ. Introducing a charge in 2022 risks many operators having to switch from using an LGV to a pre-Euro 6 diesel car or stop trading. Given the number of LGVs operating in GM, there is also a high risk of there being insufficient time in advance of 2022 to administer the funding required to support affected parties to upgrade to compliant LGVs.	This exemption is managed centrally so eligible vehicles are automatically exempt with no additional action required by the owner or registered keeper.
GM licensed Hackneys and PHVs	Hackneys and Private Hire Vehicles (PHVs), which are licensed to one of the 10 GM Authorities as of the 3rd December 2020 are eligible for a temporary exemption until 31st May 2023. After 31st May 2023, non-compliant vehicles will be charged.	The evidence from the COVID-19 impacts analysis shows major impacts on the GM taxi trade. This exemption recognises GM licenced hackneys and private hire vehicles require time to recover from the financial effects of COVID-19 and to invest in upgrades to compliant alternatives before a charge is applied.	A database of vehicles eligible for temporary exemption is taken from the Taxi and PHV Centralised Database. Therefore, no additional action is required by the owner or registered keeper.

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Temporary local exemptions	Description	Rationale	Further Information
Coaches and buses not used on a registered bus service.	Coaches and buses not used on a registered bus service are eligible for a temporary exemption until 31st May 2023. After 31st May 2023, non-compliant vehicles will be charged.	The evidence from the COVID-19 impacts analysis, shows major impacts on coach operators. This exemption recognises the high upgrade cost of coaches and that they require time to recover from the financial effects of COVID-19. 69% of coach operators are small businesses, with many providing services for vulnerable groups, particularly children, elderly people and those on low incomes. A temporary exemption provides further time for non-compliant vehicles to be upgraded to meet the standards required by a GM CAZ and protects vital services.	Owners or registered keepers of coaches and buses not used on a registered bus service need to apply for this exemption, as there is no database of these vehicles.
Outstanding finance or lease on non-compliant vehicles	Non-compliant vehicles subject to finance or lease agreements entered into before 3rd December 2020 which will remain outstanding at the time at which the GM CAZ becomes operational, are eligible for a temporary exemption until the agreement ends or until 31st May 2023, whichever is sooner. After 31st May 2023, non-compliant vehicles will be charged.	A move to a compliant vehicle is not considered feasible due to outstanding finance, which was entered into before information on the GM CAZ had been made publicly available.	Owners or registered keepers of non-compliant vehicles which are subject to outstanding finance or lease agreements at the time at which the GM CAZ becomes operational need to apply for this exemption, as there is no national database of these vehicles.
Limited supply (awaiting delivery of a compliant vehicle)	Owners or registered keepers of non-compliant vehicles that can demonstrate they have placed an order for a compliant replacement vehicle or retrofit solution, are eligible for a temporary exemption until such a time as they are in receipt of the compliant replacement	Upgrade to a compliant vehicle is not immediately possible due to an issue with the supply of a compliant vehicle or retrofit solution on order, which is considered outside of the control of the Applicant.	Owners or registered keepers of non-compliant vehicles who can evidence that they have placed an order for a compliant replacement vehicle or retrofit solution, which is yet to be received, need to apply for this exemption, as

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Temporary local exemptions	Description	Rationale	Further Information
	vehicle or retrofit solution, or for 12 weeks, or until 31st May 2023, whichever is sooner. After 31st May 2023, non-compliant vehicles will be charged.	The temporary exemption will end on 31st May 2023 as it is reasonable to expect vehicle owners have had sufficient notice to plan for upgrade during this time.	there is no national database of these vehicles. On expiry of the 12 week period of temporary exemption, vehicle owners may present further evidence of the delay in upgrade to a compliant alternative (beyond the first temporary exemption period), which could be considered on a discretionary/case by case basis for a further temporary exemption until such a time as they are in receipt of the compliant replacement vehicle or retrofit solution, or for 12 weeks, or until 31st May 2023, whichever is sooner.
Buses operating on school bus contracts entered into before 31st March 2019 and which expire in July 2022.	Buses used on a GM school bus service where the contract ends in July 2022 and where the contract was tendered prior to 31st March 2019 (submission of the GM CAP OBC[15]) are eligible for a temporary exemption to 31st July 2022. These buses must have been identified on the GM bus fleet register for at least 6 months. These vehicles will not be considered for funding under the GM CAP scheme. The vehicles must not be used for registered bus services within GM beyond 31st July 2022.	101 school bus contracts were entered into before 31st March 2019 and are due to expire in July 2022. 39 buses operating on those contracts, are reaching end of life and cannot be retrofitted.	A locally managed database of vehicles eligible to be exempted has been developed in liaison with bus operators whose school bus contracts were entered into before 31st March 2019 and which expire in July 2022.

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[15] GM submitted an Outline Business Case (OBC) setting out the GM CAP proposals to the Government at the end of March 2019.

Table 5 Permanent local discounts

Permanent local discounts	Description	Rationale	Further Information
Private HGV Tax Class vehicles	Owners or registered keepers of vehicles in the DVLA Private HGV Tax Class[16] and meeting the definition of a "special vehicle" in paragraph 4(2)(bb) of Schedule 2 to the VERA. The vehicle would be subject to a charge equivalent to the LGV daily charge (£10 a day), rather than the HGV daily charge (£60 a day).	HGVs in the DVLA Private HGV Tax Class are used unladen, privately or for driver training purposes.	A database of these vehicles is managed by the DVLA. Therefore, no additional action is required by the owner or registered keeper to register the vehicle for a discounted charge.

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[16] Information on tax classes for vehicles is available at: https://www.gov.uk/government/publications/v3551-notes-about-tax-classes

2.9 **Enforcement** – Enforcement of the GM Clean Air Zone is undertaken in accordance with the prescribed process set out within Road User Charging Schemes (Penalty Charges, Adjudication and Enforcement) (England) Regulations 2013 (the Penalty Charges Regulations)[17].

2.9.1 The GM CAZ will use a network of automatic number plate recognition (ANPR) cameras, which together with data from the Government vehicle checker will identify non-compliant vehicles.

2.9.2 Data collected through the ANPR system is handled in accordance with the General Data Protection Regulations (GDPR) and Data Protection Act 2018.

2.9.3 Where the ANPR system identifies non-compliant vehicles travelling in the GM CAZ and charges have not been paid within 7 days of the journey date, the registered keeper or other liable person is liable to pay a penalty charge of £120, which will be notified via a Penalty Charge Notice (PCN).

2.9.4 If the person or organisation named on the PCN pays the amount specified on the PCN within 14 days of service of the PCN (as indicated on the PCN), the amount payable is reduced by 50% to £60 (payable in addition to the daily charge).

2.9.5 If the person or organisation named on the PCN does not either pay the amount specified on the PCN or make a formal challenge (called a 'representation') in relation to it (on certain grounds specified in the Penalty Charges Regulations), within 28 days of the date of service of the PCN then a Charge Certificate will normally be issued and the penalty charge will be increased by 50% (as set out in the Penalty Charges Regulations) to £180 (payable in addition to the daily charge).

2.9.6 A representation against a PCN is considered and if it is accepted the PCN will be cancelled and in the event that any sums have been paid towards the PCN, these will be reimbursed. If the representation is rejected, the person or organisation named on the PCN may appeal to an independent adjudicator within 28 days of rejection of the representation.

2.9.7 Where a charge certificate has been served and is not paid within 14 days of service, enforcement action may be taken to recover the increased penalty charge along with the daily charge. If these steps are taken, the associated additional costs will increase the sum sought from the individual or organisation.

2.9.8 Detail on making a representation against a PCN can be found at: cleanairgm.com/clean-air-plans.

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[17] Road User Charging Schemes (Penalty Charges, Adjudication and Enforcement) (England) Regulations 2013, available at: https://www.legislation.gov.uk/uksi/2013/1783/contents/made

3 Funding to Upgrade to Compliant Vehicles

3.1 Owners/registered keepers[18] of a non-compliant vehicle that is subject to the GM CAZ charge may be eligible to apply for financial support towards upgrading to a compliant vehicle, subject to meeting eligibility criteria. The aim of the funding is to support an upgrade to a compliant vehicle and to mitigate the negative socio-economic effects of the GM CAZ. The supporting funds are:

- A Clean Bus Fund to provide financial support for the upgrade of non-compliant buses used on registered bus services within GM (see Section 6).
- A Clean Commercial Vehicle Fund to provide financial support for the upgrade of non-compliant LGVs and HGVs, minibuses and coaches, which is targeted to support small and micro businesses, sole traders, the self-employed, charities, social enterprises and individuals in GM (see Section 8).
- A Clean Taxi Fund to provide financial support for the upgrade of non-compliant GM Licensed Hackney Carriage and Private Hire Vehicles (see Section 9).

3.2 The funding options are:

- a lump sum grant, which contributes to the cost of retrofit, replacement or running costs[19] – the Applicant funds the remaining costs with their own capital or financing arrangements; or,
- Vehicle Finance[20], which contributes to the cost of financing a replacement vehicle through the GM scheme – the Applicant pays monthly for an agreed finance period.

3.3 Further information on funding options is available in the following sections, **Appendix B** and **Appendix C**.

3.4 Financial support as part of the GM CAP is offered on the basis of the following principles; that financial support is:

- only offered to upgrade non-compliant vehicles, which are vehicles that do not comply with the relevant GM CAZ emission standards;
- only offered to vehicles that are not eligible for a permanent national or local exemption;
- only offered to Applicants meeting the eligibility criteria for the relevant fund;

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[18] i.e. those with the legal authority to upgrade / trade-in the non-compliant vehicle.
[19] Running cost grant option only available under the Clean Taxi Fund.
[20] Available under the Clean Commercial Vehicle Fund and Clean Taxi Fund.

- provided for the replacement of a non-compliant vehicle with a compliant vehicle on a 'like-for-like' basis[21] with limited exceptions. For the Clean Commercial Vehicle Fund, flexibility of upgrade within the LGV and HGV vehicle type categories is permitted, but with the financial support based upon the type of non-compliant vehicle presented for upgrade. For the Clean Taxi Fund, flexibility of upgrade from a non-Wheelchair Accessible Vehicle (WAV) taxi to a WAV taxi[22] is permitted, with the financial support based upon the vehicle being upgraded to. Replacing a non-compliant WAV taxi with a non-WAV taxi will not be permitted;
- issued directly to accredited suppliers of retrofit and replacement vehicle upgrade options, to ensure maintenance of a comprehensive audit trail, accountability for public funding and to reduce the risk of fraudulent activity and misappropriation of funds. The only exceptions to this are the Clean Bus Fund and running cost grants under the Clean Taxi Fund, which the financial support is paid to the Applicant;
- subject to the non-compliant vehicle being 'traded-in' against the replacement vehicle funded through the GM CAP and at the dealership where the compliant vehicle is being sourced;
- with the exception of the Clean Bus Fund, limited to a maximum of 5 vehicles per Applicant. Applications for a mix of vehicle types are permitted, up to a total of 5 vehicles per Applicant, across all vehicle types;
- with the exception of the Clean Bus Fund, financial support is limited to a monetary value of £325,000 per Applicant. This figure is inclusive of any cumulative financial benefit from discounts, exemptions, grants or Vehicle Finance secured through the GM CAP or any other applicable public funding source;
- only available insofar as it complies with UK's subsidy control regime[23];
- only offered as Vehicle Finance or running cost grant[24] when the compliant replacement vehicle being funded is also receiving a Government plug-in grant[25].

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[21] i.e. financial support will not be available to facilitate upgrade of a non-compliant vehicle to a compliant vehicle of a different vehicle type (e.g. LGV, HGV) or Euro Category (e.g. N1, N2) (see Appendix A, **Table A1** for details of vehicle types and Euro Categories)

[22] The use of the term 'taxi' relates to Hackney Carriages and PHVs.

[23] Including the World Trade Organisation's (WTO) subsidy rules, known as the Agreement on Subsidies and Countervailing Measures (ASCM) and further commitments in varies Free Trade Agreements (FTAs) with other countries including the EU-UK Trade and Cooperation Agreement (TCA). For further information please see: Complying with the UK's international obligations on subsidy control: guidance for public authorities, available at: https://www.gov.uk/government/publications/complying-with-the-uks-international-obligations-on-subsidy-control-guidance-for-public-authorities

[24] i.e. New Zero Emission Capable (ZEC) vehicles in receipt of a Government plug-in grant will not be provided with retrofit, replacement grant or Grant + Vehicle Finance options. Running cost grants are only available under the Clean Taxi Fund.

[25] Information on low-emission vehicles eligible for a plug-in grant is available at: https://www.gov.uk/plug-in-car-van-grants

4 Management of Funds

4.1 Transport for Greater Manchester is to be responsible for distributing the Clean Bus Fund, Clean Commercial Vehicle Fund and Clean Taxi Fund.

4.2 The Clean Commercial Vehicle Fund and Clean Taxi Fund are to be made available through funding rounds, designed to direct funding towards the smallest businesses and individuals, who are likely to be most economically vulnerable to the impacts of the GM CAZ. The funding rounds applicable to each of the Funds are set out within the corresponding sections of the Policy.

4.3 GM will keep the distribution of Funds under review. If funding has not been distributed at the end of the funding rounds specified in this Policy, the Air Quality Administration Committee[26] has the authority to consider possible changes to the eligibility criteria, including opening up the Funds to vehicle owners outside GM.

5 Distribution of Funds

5.1 Owners/registered keepers can use the Government vehicle checker to understand if their current vehicle is non-compliant. The vehicle checker can be accessed online at: gov.uk/check-clean-air-zone-charge. Any queries relating to the classification of vehicles, as used by the Government vehicle checker, is a matter for the owner/registered keeper and the DVLA.

5.2 Owners/registered keepers of non-compliant vehicles can access information about the funding options available to upgrade to a compliant vehicle at: cleanairgm.com/clean-air-plans. The website provides information on eligibility criteria for funding and how to apply and compare funding options before an Applicant needs to enter the formal application process.

5.3 Those wishing to proceed with an application, are directed to set up a secure online account and provide the necessary information to submit an application for funding. This includes providing data about themselves, their vehicle and their business, organisation, or as an individual and these details are verified through a series of validation checks to external data sources.

5.4 Following a successful eligibility assessment[27] and acceptance of the relevant terms and conditions of funding, the Applicant is provided with a funding award notification, which will set out the funding options available to them. At this stage, the Applicant is able to explore the funding opportunities available to them.

5.5 With the exception of the Clean Bus Fund and running cost grants under the Clean Taxi Fund, which are paid to the Applicant, all funds are paid directly through accredited suppliers of retrofit and replacement upgrade options, to ensure maintenance of a comprehensive audit trail, accountability for public funding and to reduce the risk of fraudulent activity and misappropriation of funds. ‘Trade in’ of the non-complaint vehicle is mandatory.

5.6 **Appendix B** provides more detail on the distribution of Funds.

[26] A Joint Committee of charging authorities and the GMCA to enable the joint discharge of the GMCA’s and Local Authorities’ functions and in relation to the Greater Manchester Clean Air Plan.

[27] subject to a funding round being open for the Applicant and vehicle type.

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6 Clean Bus Fund

6.1 **Retrofit** – This Fund provides a financial support mechanism to retrofit buses with older engine standards to the less polluting Euro VI standard where possible. This funding is available to eligible vehicles used on registered bus services within GM.

6.2 Government have awarded GM £14.7m of funding to retrofit non-compliant buses operating on a registered bus service within GM. The Government's Joint Air Quality Unit[28] (JAQU) confirmed that this funding will be delivered as a continuation of the Clean Bus Technology Fund and it was subsequently opened to applications from December 2020.

6.3 The Fund provides a grant of up to £16,000 towards retrofit to a compliant standard via a Clean Vehicle Retrofit Accreditation Scheme (CVRAS) certified system. Funding is available to eligible vehicles that have been operating a registered bus service within GM, for not less than six (6) full consecutive calendar months immediately prior to the date of application and are less than 13 years old.

6.4 **Replacement** – It is estimated that there are nearly 350 non-compliant buses operating on registered bus services within GM that cannot be retrofitted. Government have awarded £3.2m to support the replacement of non-compliant vehicles for small and medium sized bus operators, operating on registered bus services in GM.

6.5 A grant of £16,000 is available towards the cost of replacing a non-compliant vehicle used on a registered bus service within GM with a compliant vehicle which meets GM CAZ emission standards.

6.6 Applicants for Replacement funding will need to demonstrate that[29]:

- they are the registered operator for a registered bus service operating in GM[30];
- they are a small (including micro business / entity)[31] or medium-sized[32] business;

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[28] A joint unit of the DfT and the Department for Environment, Food and Rural Affairs, has led the Government's current work to try and ensure the UK is compliant with the legal limit values for nitrogen dioxide in the shortest time possible.

[29] It is the responsibility of the Applicant to ensure their information held with the relevant agencies, e.g. DVLA and Companies House, is up to date and accurate.

[30] For the purpose of the GM CAP scheme, a 'vehicle used on a registered bus service within GM' is any vehicle operated on a bus service within GM that has been registered with the Traffic Commissioner for the North West of England. The vehicle would be on the bus fleet data list which is captured every six months by Transport for Greater Manchester (TfGM) and which is marked and agreed as "Identified as PVR (Peak Vehicle Requirement) + Spare vehicles on GM services". Therefore, any vehicle identified as such on the bus fleet data list captured by TfGM will be considered to be 'a vehicle used on a registered bus service within GM' for the purposes of the GM CAP scheme.

[31] A business/company are considered 'small' if it has any 2 of the following:

- a turnover of £10.2 million or less;
- £5.1 million or less on its balance sheet;
- 50 employees or less;

As defined by Companies House, June 2021. Available at: https://www.gov.uk/annual-accounts/microentities-small-and-dormant-companies

[32] A business/company are considered 'medium' if it has any 2 of the following:

- the annual turnover must be no more than £36 million
- the balance sheet total must be no more than £18 million
- the average number of employees must be no more than 250.

As defined by Companies House, June 2021. Available at: https://www.gov.uk/government/publications/life-of-a-company-annual-requirements/life-of-a-company-part-1-accounts

- they have not been in receipt of, or be subject to, a current Application for public sector clean air funding in GM or elsewhere in the United Kingdom for upgrade (retrofit or replacement) of the same vehicle(s) that is to be upgraded through the GM Clean Bus Fund;
- they have been operating a registered bus service within GM, for not less than twelve (12) full consecutive calendar months immediately prior to the date of application[33];
- the non-compliant vehicle has been registered to[34] the Applicant and operated on a registered bus service within GM for not less than twelve (12) consecutive calendar months immediately prior to the date of application;
- the non-compliant vehicle has a valid MOT, road tax and suitable insurance to operate a bus passenger service, at the date of application;
- the upgraded vehicle is compliant with the GM CAZ emission standards as a minimum; and,
- the upgraded vehicle will continue to operate on a registered bus service within GM for a minimum of 5 years following receipt of funding. If it is replaced or taken out of service in GM it must be replaced by a vehicle which meets the same emissions standard or better, e.g. a compliant bus must be replaced with another compliant bus, and must be of the same age or younger.

6.7 If the Fund is oversubscribed, , in addition to Applicants meeting the eligibility criteria, a process could be applied which seeks to maximise air quality benefits, targeting funding towards the upgrade of the oldest vehicles first or those vehicles operating in areas with particularly poor air quality (points of exceedance).

7 Vehicle Finance

7.1 The Vehicle Finance measure will provide access to an affordable finance option for eligible Applicants who require assistance in funding the cost of upgrading to a compliant HGV, LGV, Coach, Minibus, GM licensed Hackney Carriage or GM licensed Private Hire Vehicle. It has been designed to address some of the potential reasons that finance might typically be refused, including affordability of finance re-payments or a thin credit file.

7.2 Vehicle Finance utilises the GM CAP Clean Commercial Vehicle Fund and Clean Taxi Fund to offer eligible Applicants, who require assistance in funding the cost of upgrading to a compliant vehicle, access to affordable finance through a panel of GM appointed finance providers.

7.3 The financial support set out in the sections for the Clean Commercial Vehicle Fund (Section 8) and Clean Taxi Fund (Section 9) outlines the maximum funding an Applicant can receive for each vehicle type. **Appendix C** sets out the detailed grant funding and Vehicle Finance offers by vehicle type.

[33] Bus operators who can demonstrate they have been running non-compliant vehicles on a school bus service within GM for a full academic year (September – July) are considered to have satisfied the eligibility criteria to have been operating a registered bus service within GM, for not less than twelve (12) full consecutive calendar months immediately prior to the date of application.

[34] i.e. the Applicant has the legal authority to upgrade / trade-in the non-compliant vehicle.

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7.4 Access to Vehicle Finance is offered as an option alongside retrofit, replacement and running cost grants (where available) and Applicants will therefore be able to choose the option which best suits their individual circumstances.

7.5 In addition to meeting the eligibility criteria set out for the Clean Commercial Vehicle Fund (Section 8) or the Clean Taxi Fund (Section 9), Applicants for Vehicle Finance will need to satisfy the requirements of the Finance Provider (e.g. holding a UK bank account in the name of the Applicant/business, consenting to the Finance Provider carrying out credit reference searches, deposit contribution).

7.6 Vehicle Finance lending decisions rest with the Finance Provider and are subject to individual circumstances.

7.7 Where an Applicant is unsuccessful in securing a vehicle finance agreement, the replacement grant option will remain available to the Applicant.

8 Clean Commercial Vehicle Fund

8.1 Government have made various funding awards (detailed below) to help upgrade commercial style vehicles: HGVs, LGVs, minibuses and coaches, collectively referred to as the Clean Commercial Vehicle Fund (CCVF). Funding is targeted to support eligible small and micro businesses, sole traders, self-employed, charities, social enterprises and individuals in GM.

8.2 The use of the term 'commercial vehicle' relates to the vehicle type, i.e. HGVs, LGVs, minibuses and coaches, not its commercial use. Funding is available to both commercial and private owners/registered keepers of non-compliant vehicles, where eligible.

8.3 Eligible Applicants will be offered the option of:

- a grant towards retrofit, where the GM CAP funds contribute to the costs of retrofit; or,
- a contribution towards a replacement compliant vehicle, where the GM CAP funds contribute to the costs of a replacement vehicle – this may be as:
    - a lump sum grant - the Applicant funds the remaining costs with their own capital or financing arrangements; or
    - access to Vehicle Finance – the Applicant pays monthly for an agreed finance period (as set out in Section 7 Vehicle Finance).

8.4 Further detail on funding options by vehicle type can also be found in **Appendix C**.

8.5 **HGVs** – Government have awarded £7.6m of funding towards the upgrade of non-compliant HGVs. This will provide funding towards the retrofit of vehicles to meet the GM CAZ emission standards, or to replace non-compliant vehicles with compliant vehicles. Funding is available to both commercial and private owners/registered keepers of non-compliant HGVs.

8.6 The following funding options are available for HGVs:

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- up to £16,000 towards retrofit to a compliant standard via a Clean Vehicle Retrofit Accreditation Scheme (CVRAS) certified system are available; or,
- up to £12,000 towards a compliant replacement vehicle, dependent on the size of non-compliant vehicle for replacement; as follows:
    - 44t[35] HGV (up to 44t HGV) – up to £6,500
    - 32t rigid HGV (over 26t and up to 32t rigid HGV) – up to £12,000
    - 26t rigid HGV (over 18t and up to 26t rigid HGV) – up to £9,000
    - 18t rigid HGV (over 7.5t and up to 18t rigid HGV) – up to £7,000
    - Up to 7.5t rigid HGV (over 3.5t and up to 7.5t rigid HGV) – up to £5,000

8.7 **LGVs** – Government have awarded £70m of funding towards the upgrade of non-compliant LGVs. This will provide funding towards the retrofit of vehicles to meet the GM CAZ emission standards, or to replace non-compliant vehicles with compliant vehicles.

8.8 The following funding options are available for LGVs:

- up to £5,000 towards retrofit to a compliant standard via a Clean Vehicle Retrofit Accreditation Scheme (CVRAS) certified system; or,
- up to £4,500 towards a compliant replacement vehicle, dependent on the size of non-compliant vehicle for replacement; as follows:
    - under 1.6t[36] LGV – up to £3,500
    - over 1.6t and up to 3.5t LGV – up to £4,500

8.9 **Minibuses** (which are not a licensed hackney or PHV or used on a GM registered bus service) – Government have awarded £2m of funding towards the upgrade of non-compliant minibuses. This will provide funding towards the retrofit of vehicles to meet the GM CAZ emission standards, or to replace non-compliant vehicles with compliant vehicles.

8.10 The following funding options are available for minibuses:

- up to £5,000 towards retrofit to a compliant standard via a Clean Vehicle Retrofit Accreditation Scheme (CVRAS) certified system; or,
- up to £5,000 towards a compliant replacement vehicle.

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[35] Weights given are Gross Vehicle Weight (GVW) - the weight of a vehicle or trailer, including the maximum load, that can be safely carried when it is being used on the road. This are listed in the owner's manual. Also known as the maximum authorised mass (MAM) or permissible maximum weight.

[36] Weights given are Gross Vehicle Weight (GVW) - the weight of a vehicle or trailer, including the maximum load, that can be safely carried when it is being used on the road. This are listed in the owner's manual. Also known as the maximum authorised mass (MAM) or permissible maximum weight.

8.11 **Coaches and Buses** (which are not used on a GM registered bus service) – Government have awarded £4.4m of funding towards the upgrade of coaches and buses which are not used on a GM registered bus service. This will provide funding towards the retrofit of vehicles to meet the GM CAZ emission standards, or to replace non-compliant vehicles with compliant vehicles.

8.12 The following funding options are available for coaches and buses which are not used on a GM registered bus service:

- up to £16,000 towards retrofit to a compliant standard via a Clean Vehicle Retrofit Accreditation Scheme (CVRAS) certified system are available, or,
- up to £32,000 towards a compliant replacement vehicle, only available where the vehicle cannot be retrofitted.

8.13 **Eligibility criteria for the CCVF** - Applicants to the CCVF will need to demonstrate that[37]:

- they are either:
  - a small business[38],
  - a micro business / entity[39];
  - self-employed / sole trader[40];
  - an entity regulated by the Charity Commission (including registered, active charities and active charities exempted from registration);
  - a social enterprise[41] (including non-profit organisations); or
  - a private owner (owner/registered keeper) of a non-compliant vehicle[42] which are not used for commercial purposes.

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[37] It is the responsibility of the Applicant to ensure their information held with the relevant agencies, e.g. DVLA and Companies House, is up to date and accurate.

[38] A business/company are considered 'small' if it has any 2 of the following:
- a turnover of £10.2 million or less;
- £5.1 million or less on its balance sheet;
- 50 employees or less;

As defined by Companies House, June 2021. Available at: https://www.gov.uk/annual-accounts/microentities-small-and-dormant-companies

[39] A company are considered a micro-entity if it has any 2 of the following:
- a turnover of £632,000 or less;
- £316,000 or less on its balance sheet;
- 10 employees or less;

As defined by Companies House, June 2021. Available at: https://www.gov.uk/annual-accounts/microentities-small-and-dormant-companies

[40] Guidance on whether you are considered to be self-employed / a sole trader is available at: https://www.gov.uk/working-for-yourself

[41] A business is probably a social enterprise if it:
- operates as a business with primarily social/environmental objectives, whose surpluses are principally reinvested for that purpose in the business or community rather than mainly being paid to shareholders and owners;
- does not pay more than 50 per cent of profit or surplus to owners or shareholders, as a social enterprise principally reinvests profit or surplus into the enterprise instead of paying it to owners or shareholders;
- typically it is registered with Companies House as an active company in the UK (or the Financial Conduct Authority if a cooperative); and,
- According to the legal structure may be beneficiary of government funds.

[42] LGVs, HGVs, minibuses, or buses and coaches which are not used on a registered bus service within GM.

- they have had a business address within GM for not less than twelve (12) full consecutive calendar months immediately prior to the date of Application or, where they are a private owner, their only or main residential address has been within GM for not less than twelve (12) full consecutive calendar months immediately prior to the date of Application.
- they, and the non-compliant vehicle, have not already been in receipt of government clean air funding for the purpose of upgrade of the same non-compliant vehicle that is the subject of the application, in GM or elsewhere in the United Kingdom;
- they have not received and do not expect to receive more than £325,000 (or equivalent) of domestic or international funding/subsidy from any government/public sources over a period of three fiscal years. This figure is inclusive of any financial benefit from discounts, exemptions, grants or Vehicle Finance secured through the GM CAP or any other applicable public funding source.
- they are the owner/registered keeper[43] of the non-compliant vehicle;
- the non-compliant vehicle has been owned by/registered to the Applicant for not less than twelve (12) consecutive calendar months immediately prior to the date of Application. For the retrofit of coaches and buses, the non-compliant vehicle has been owned by/registered to the Applicant for not less than six (6) consecutive calendar months immediately prior to the date of Application;
- the non-compliant vehicle has been registered to an address in GM for not less than twelve (12) consecutive calendar months immediately prior to the date of Application. For the retrofit of coaches and buses, the non-compliant vehicle has been registered to an address in GM for not less than six (6) consecutive calendar months immediately prior to the date of Application;
- the non-compliant vehicle has a valid MOT (or annual test)[44], road tax and insurance, as appropriate for the vehicle use/organisation, at the date of Application;
- the non-compliant vehicle is replaced by a compliant vehicle on a like for like basis, or upgraded via a Clean Vehicle Retrofit Accreditation Scheme (CVRAS) certified emission reduction system, to meet GM CAZ emission standards;
- they declare the Applicant/organisation and the upgraded vehicle will continue to have a base location in GM for not less than twelve (12) full consecutive calendar months following receipt of funding.

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[43] i.e. the Applicant has the legal authority to upgrade / trade-in the non-compliant vehicle.
[44] An annual test (MOT) applies for a lorry, bus or trailer. Further information is available at: https://www.gov.uk/getting-an-mot/vehicles-exempt-from-mot

8.14 The funding rounds for HGVs, Coaches and Buses, and Minibuses are:

- an initial round of funding open to eligible micro-businesses, self-employed, sole-traders, charities, social enterprises and private owners/registered keepers of a non-compliant vehicle; up to the vehicle cap (up to a total of 5 vehicles per Applicant); and
- subject to available funds, a second round of funding open to all eligible owners/registered keepers of a non-compliant vehicle; up to the vehicle cap (up to a total of 5 vehicles per Applicant).

8.15 The funding rounds for LGVs are:

- an initial round of funding open to eligible micro-businesses, self-employed, sole-traders, charities, social enterprises and private owners/registered keepers of a non-compliant vehicle of Euro Emission standard 4 (Euro 4) or older; up to the vehicle cap (up to a total of 5 vehicles per Applicant);
- subject to available funds, a second round of funding open to eligible micro-businesses, self-employed, sole-traders, charities, social enterprises and private owners/registered keepers of a non-compliant vehicle; up to the vehicle cap (up to a total of 5 vehicles per Applicant); and
- subject to available funds, a third round of funding open to all eligible owners/registered keepers of a non-compliant vehicle; up to the vehicle cap (up to a total of 5 vehicles per Applicant).

9 Clean Taxi Fund

9.1 The Clean Taxi Fund (CTF) will support the upgrade of non-compliant GM licensed Hackney Carriages[45] and private hire vehicles (PHVs). The use of the term 'taxi' relates to Hackney Carriages and PHVs.

9.2 Government have awarded £19.7m[46] of funding towards the upgrade of non-compliant taxis. This will provide funding towards the retrofit of vehicles to meet the GM CAZ emission standards or towards the replacement of non-compliant vehicles with compliant vehicles or towards running costs when the compliant vehicle acquired with GM CAP funds is also receiving a Government plug-in grant[47].

9.3 Eligible Applicants will be offered the option of:

- a grant towards retrofit, where the GM CAP funds contribute to the costs of retrofit; or,
- a running cost grant towards the running costs of a new Zero Emissions Capable (ZEC) vehicle; or,
- a contribution towards a replacement vehicle, where the GM CAP funds contribute towards the costs of a replacement vehicle – this may be as:

[45] i.e. those vehicles with a Hackney Carriage License.
[46] Government have awarded £10.2m for the upgrade of PHVs and £9.5m for the upgrade of Hackney Carriages.
[47] Information on low-emission vehicles eligible for a plug-in grant is available at: https://www.gov.uk/plug-in-car-van-grants

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- a lump sum grant – the Applicant funds the remaining costs with their own capital or financing arrangements; or,
- access to Vehicle Finance – the Applicant pays monthly for an agreed finance period (as set out in Section 7 Vehicle Finance).

9.4 Further detail on funding options by vehicle type can also be found in **Appendix C**.

9.5 **Wheelchair accessible vehicles** - the following funding is available for upgrading a non-compliant taxi to a purpose-built Wheelchair Accessible Vehicle (WAV)[48]:

- up to £5,000 towards retrofit to a compliant standard via a Clean Vehicle Retrofit Accreditation Scheme (CVRAS) certified system; or,
- up to £10,000 towards the running costs of a new purpose-built WAV Zero Emissions Capable (ZEC)[49] replacement vehicle. This option is available when the compliant replacement vehicle acquired with GM CAP funds is also receiving a Government plug-in grant; or,
- up to £10,000 towards a second-hand purpose-built WAV ZEC replacement vehicle; or,
- up to £5,000 towards a compliant purpose-built WAV replacement vehicle (Euro 4 petrol or Euro 6 diesel or better).

9.6 **Non-Wheelchair accessible vehicles** – the following funding is available for upgrading a non-compliant taxi to a non-Wheelchair Accessible Vehicle (WAV):

- up to £5,000 towards retrofit to a compliant standard via a Clean Vehicle Retrofit Accreditation Scheme (CVRAS) certified system; or,
- up to £6,000 towards the running costs of a new Zero Emissions Capable (ZEC) replacement vehicle[50]. This option is available when the compliant replacement vehicle acquired with GM CAP funds is also receiving a Government plug-in grant; or,
- up to £6,000 towards a second-hand ZEC replacement vehicle; or,
- up to £3,000 towards a compliant replacement vehicle (Euro 4 petrol or Euro 6 diesel or better); or,
- up to £5,000 towards a compliant replacement 6+ seater vehicle (Euro 4 petrol or Euro 6 diesel or better).

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[48] Purpose-built Wheelchair Accessible Vehicles (WAV) must satisfy the license requirements of the relevant GM Licensing Authority.
[49] A Zero Emissions Capable Vehicle (ZEC) is defined as having CO_2 emissions of less than 50g/km and a zero emission range of at least 70 miles, as defined by Government, available at: https://www.gov.uk/plug-in-car-van-grants/eligibility
[50] A Zero Emissions Capable Vehicle (ZEC) is defined as having CO_2 emissions of less than 50g/km and a zero emission range of at least 70 miles, as defined by Government, available at: https://www.gov.uk/plug-in-car-van-grants/eligibility

9.7 **Eligibility criteria for the CTF** - Applicants for the CTF will need to demonstrate that[51]:

- they are the owner/registered keeper[52] of the non-compliant vehicle;
- the non-compliant vehicle is licensed for the purposes of Hackney Carriage or a private hire services with one of the 10 Local Authorities in GM and has been so licensed for not less than twelve (12) uninterrupted consecutive calendar months immediately prior to the date of Application;
- the non-compliant vehicle has been owned by the Applicant for not less than twelve (12) uninterrupted consecutive calendar months immediately prior to the date of Application;
- the non-compliant vehicle is replaced by a compliant vehicle or upgraded via a Clean Vehicle Retrofit Accreditation Scheme (CVRAS) approved emission reduction system, to meet GM CAZ emission standards.
- the non-compliant vehicle has current road tax and business insurance at the date of Application;
- they declare that they will remain licensed with one of the 10 GM Local Authorities for the purpose of performing Hackney Carriage or private hire duties within GM for two (2) years following the receipt of funding; and,
- they have not received and do not expect to receive more than £325,000 (or equivalent) of domestic or international funding/subsidy from any government/public sources over a period of three fiscal years. This figure is inclusive of any financial benefit from discounts, exemptions, grants or Vehicle Finance secured through the GM CAP or any other applicable public funding source.

9.8 The funding rounds for taxis are:

- an initial round of funding open to eligible owners/registered keepers of a non-compliant taxi, with a limit of one vehicle per Applicant;
- a second round of funding open to eligible owners/registered keepers of a non-compliant taxi, up to the vehicle cap (up to a total of 5 vehicles per Applicant).

10 Fraudulent Activity and Misappropriation

10.1 If an Applicant is found to have abused the application process for the funds, Vehicle Finance, discounts or exemptions (e.g. by the provision of falsified or misrepresented information), the right is reserved to terminate discounts or exemptions, terminate applications for funding or take enforcement action to seek to recover any losses where information provided is not truthful or accurate.

[51] It is the responsibility of the Applicant to ensure their information held with the relevant agencies, e.g. DVLA and Licensing Authorities, is up to date and accurate.
[52] i.e. the Applicant has the legal authority to upgrade / trade-in the non-compliant vehicle.

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10.2 Furthermore, any Applicants found to have abused the application process, made a fraudulent application or misappropriated discounts, exemptions or funding, will not be eligible for any GM CAZ local discounts, local exemptions or further financial support and the matter may be referred to other relevant authorities where relevant.

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11 Appendix A – Clean Air Zone vehicle categories and minimum emission standards as set out in the UK Government's Clean Air Zone Framework

Table A1 – CAZ vehicle categories and minimum emission standards as set out in the Clean Air Zone Framework[53]

Vehicle Type	Euro Category	Minimum[54] CAZ Compliant Euro Emission Standard	Example Vehicles[55]
Bus	**M3** (Gross Vehicle Weight (GVW) over 5000kg and more than 8 seats in addition to the driver)	Euro VI (diesel)	Buses (single decker, double decker and midi), Coaches (single and double decker).
Coach		Euro VI (diesel)	
HGV	**N2** (GVW[56] over 3500 kg) **N3** (GVW over 5000 kg)	Euro VI	Articulated vehicles, rigid HGVs, flatbed lorries, concrete mixers, 2-axle lorry, some motorised caravans (>3.5t) and motorised horseboxes (>3.5t).
Minibus	**M2** (GVW not exceeding 5000 kg and more than 8 seats in addition to the driver)	Euro 6 and VI (diesel) Euro 4 and IV (petrol)	Minibuses (excluding those which are licensed as a Hackney Carriage or Private Hire Vehicle – see Hackney Carriage and Private Hire Vehicles below).
LGV	**N1** (GVW not exceeding 3500 kg)	Euro 6 (diesel) Euro 4 (petrol)	Vans (short and long wheelbase), some car derived vans, some light 4x4 utility vehicles, pickups and campervans.
Hackney Carriage and Private Hire Vehicles	Minibus – **M2** (GVW not exceeding 5000 kg and more than 8 seats in addition to the driver) **M1** Passenger vehicle with up to 8 seats in addition to the driver	Euro 6 (diesel) Euro 4 (petrol)	Vehicles licensed as Hackney Carriages and/or Private Hire Vehicles.

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[53] Defra and DfT. 2020. Clean Air Zone Framework, Annex A. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/863730/clean-air-zone-framework-feb2020.pdf

[54] Note the minimum compliant standard is specified in Table 3.1.2. Vehicles which meet Euro 5 (V) and 6 (VI) petrol standards will also be compliant.

[55] As set out by Greater Manchester. These example vehicles do not feature in the Government Guidance and are provided for guidance only.

[56] The weight of a vehicle or trailer, including the maximum load, that can be safely carried when it is being used on the road. This are listed in the owner's manual. Also known as the maximum authorised mass (MAM) or permissible maximum weight.

12 Appendix B – Funding Options and Application

12.1 Following a successful eligibility assessment[57] and acceptance of the relevant terms and conditions of funding, the Applicant is provided with a funding award notification. The Applicant is then able to explore the funding opportunities available to them, which could include:

- Grant – retrofit
- Grant – replacement vehicle
- Vehicle Finance – replacement vehicle[58]
- Grant & Vehicle Finance – replacement vehicle[59]
- Running Cost Grant – replacement to new Zero Emission Capable (ZEC) Taxis[60]

12.2 **Grant – retrofit** – A contribution towards the cost of retrofit to a compliant standard via a Clean Vehicle Retrofit Accreditation Scheme (CVRAS) certified system The Applicant is directed to suitable retrofitting suppliers to place an order. For retrofits funded by the Clean Commercial Vehicle Fund or Clean Taxi Fund, the cost of retrofit is paid directly to the retrofit supplier. For retrofits funded by the Clean Bus Fund, the cost of retrofit is paid to the Applicant.

12.3 **Grant – replacement vehicle** – A lump sum grant is available to the Applicant. The Applicant is directed to a list of Accredited Dealerships[61] that can be used to source a compliant vehicle. The Accredited Dealerships are able to confirm the amount and status of the funding awarded, so that, once the replacement compliant vehicle is ready for the Applicant to complete their transaction, the Dealership can access the GM CAP grant funds to proceed with the transaction.

12.4 **Vehicle Finance – replacement vehicle** – Vehicle Finance is offered as a finance contribution to the Applicant through a panel of GM appointed Finance Providers. The Applicant is directed to a range of Finance Providers and dealerships in the Finance Provider's network that can be used to source a compliant vehicle. The Finance Providers will undertake an assessment of affordability. If successful, the Applicant is able to complete their transaction and vehicle handover with a dealership in the Finance Provider's network. Once the replacement compliant vehicle is ready for the Applicant to complete their transaction, the Dealership can access the GM CAP finance funds to proceed with the transaction.

[57] subject to a funding round being open for the Applicant and vehicle type.
[58] Option available under the Clean Commercial Vehicle Fund and Clean Taxi Fund.
[59] Option available under the Clean Commercial Vehicle Fund and Clean Taxi Fund.
[60] Option available under the Clean Taxi Fund.
[61] Replacement vehicles obtained through the GM CAP Clean Commercial Vehicle Fund and Clean Taxi Fund will be funded through Accredited Dealerships. Accredited Dealerships must meet criteria/checks including:
- Company Check
- ID & V Check for Individual, Sole Trader and Partnership
- Companies House check to prove not a disqualified director
- FCA Accredited & current FCA license in the same name as the application
- Credit Bureau Checks (No CCJ over £500 or more than 2 in total
- VAT Number - passes number formula check
- KYC and Money Laundering Check - Investigations passed

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12.5 **Grant & Vehicle Finance – replacement vehicle** – In some cases, Vehicle Finance is available comprised of a lump sum grant and finance contribution. The Applicant is directed to a range of Finance Providers and dealerships in the Finance Provider's network that can be used to source a compliant vehicle. The Finance Providers will undertake an assessment of affordability. If successful, the Applicant is able to complete their transaction and vehicle handover with a dealership in the Finance Provider's network. Once the replacement compliant vehicle is ready for the Applicant to complete their transaction, the dealership can access the GM CAP grant and finance funds to proceed with the transaction.

12.6 **Running Cost Grant – replacement to new Zero Emission Capable (ZEC) Taxis** – Where replacement is to a new Zero Emission Capable (ZEC) taxi, a grant payment is available in the form of a contribution towards the running costs of a vehicle. In this instance, the grant payment is made directly to the Applicant via two staggered payments. The first payment is made following completion of the vehicle handover with the Accredited Dealership/dealership in the Finance Provider's network and upon confirmation that the vehicle is licensed as a Hackney or Private Hire Vehicle with one of the 10 Greater Manchester Authorities. The second payment will be made two (2) years after the date of the first payment and upon confirmation that the vehicle has been licensed during this period and remains licensed as a Hackney or Private Hire Vehicle with one of the 10 Greater Manchester Authorities.

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13 Appendix C – Detailed Funding Options by Vehicle Type

13.1 Appendix C sets out the detailed funding offers for the Clean Bus Fund, Clean Commercial Vehicle Fund & Clean Taxi Fund. All funding options shown in Appendix C are subject to the relevant criteria, as set out in the GM CAP Policy.

Clean Bus Fund

Vehicle Type	Retrofit grant (per vehicle)	Replacement grant[62] (per vehicle)
Vehicle used on a registered bus service within GM[63]	Up to £16,000	£16,000

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[62] Replacement funding is subject to the award of Government funding.

[63] For the purpose of the GM CAP scheme, a 'vehicle used on a registered bus service within GM' is any vehicle operated on a bus service within GM that has been registered with the Traffic Commissioner for the North West of England. The vehicle would be on the bus fleet data list which is captured every six months by Transport for Greater Manchester (TfGM) and which is marked and agreed as "Identified as PVR (Peak Vehicle Requirement) + Spare vehicles on GM services". Therefore, any vehicle identified as such on the bus fleet data list captured by TfGM will be considered to be 'a vehicle used on a registered bus service within GM' for the purposes of the GM CAP scheme.

Clean Commercial Vehicle Fund

Vehicle Type / Weight[64]		Retrofit grant (per vehicle)	Replacement grant (per vehicle)	Grant & Vehicle Finance (Replacement) (per vehicle)	Vehicle Finance (Replacement) (per vehicle)
HGV	44t HGV (up to 44t HGV)	Up to £16,000	£6,500	Up to £6,500	Up to £6,500
	32t rigid HGV (over 26t and up to 32t rigid HGV)	Up to £16,000	£12,000	Up to £12,000	Up to £12,000
	26t rigid HGV (over 18t and up to 26t rigid HGV)	Up to £16,000	£9,000	Up to £9,000	Up to £9,000
	18t rigid HGV (over 7.5t and up to 18t rigid HGV)	Up to £16,000	£7,000	Up to £7,000	Up to £7,000
	Up to 7.5t rigid HGV (over 3.5t and up to 7.5t rigid HGV)	Up to £16,000	£5,000	Up to £5,000	Up to £5,000
	New Zero Emissions Capable (ZEC) vehicle[65]	Not available	Not available	Not available	Up to £12,000 dependent on vehicle weight (set out above)
	Second-hand ZEC vehicle	Not available	Up to £12,000 dependent on vehicle weight (set out above)	Up to £12,000 dependent on vehicle weight (set out above)	Up to £12,000 dependent on vehicle weight (set out above)

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[64] All weights given are Gross Vehicle Weight (GVW) - the weight of a vehicle or trailer, including the maximum load, that can be safely carried when it is being used on the road. This are listed in the owner's manual. Also known as the maximum authorised mass (MAM) or permissible maximum weight.

[65] A Zero Emissions Capable (ZEC) Vehicle (truck) is defined as having CO_2 emissions of less than 50g/km and a zero emission range of at least 60 miles, as defined by Government, available at: https://www.gov.uk/plug-in-car-van-grants/eligibility

Vehicle Type / Weight[64]		Retrofit grant (per vehicle)	Replacement grant (per vehicle)	Grant & Vehicle Finance (Replacement) (per vehicle)	Vehicle Finance (Replacement) (per vehicle)
LGV	under 1.6t LGV	Up to £5,000	£3,500	Up to £3,500	Up to £3,500
	Over 1.6t and up to 3.5t LGV	Up to £5,000	£4,500	Up to £4,500	Up to £4,500
	New ZEC vehicle[66]	Not available	Not available	Not available	Up to £4,500 dependent on vehicle weight (set out above)
	Second-hand ZEC vehicle	Not available	Up to £4,500 dependent on vehicle weight (set out above)	Up to £4,500 dependent on vehicle weight (set out above)	Up to £4,500 dependent on vehicle weight (set out above)
Minibus	N/A	Up to £5,000	£5,000	Up to £5,000	Up to £5,000
Coach or Bus not used on a registered bus service within GM	N/A	Up to £16,000	£32,000	Up to £32,000	Up to £32,000

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[66] A Zero Emissions Capable (ZEC) Vehicle (van) is defined as having CO_2 emissions of less than 50g/km and a zero emission range of at least 60 miles, as defined by Government, available at: https://www.gov.uk/plug-in-car-van-grants/eligibility

Clean Taxi Fund

Vehicle Type		Retrofit grant (per vehicle)	Replacement grant (per vehicle)	Grant & Vehicle Finance (Replacement) (per vehicle)	Vehicle Finance (Replacement) (per vehicle)	Running Cost Grant (per vehicle)
Purpose-built Wheelchair Accessible Vehicle	New Zero Emissions Capable (ZEC)[67]	Not available	Not available	Up to £10,000	Up to £10,000	Up to £10,000
	Second-hand ZEC	Not available	£10,000	Up to £10,000	Up to £10,000	Only available for new Zero Emissions Capable Vehicles
	Compliant Vehicle (Euro 4 petrol or Euro 6 diesel or better)	Up to £5,000	£5,000	Up to £5,000	Up to £5,000	Only available for new Zero Emissions Capable Vehicles
Non-Wheelchair Accessible Vehicle	New Zero Emissions Capable (ZEC)	Not available	Not available	Up to £6,000	Up to £6,000	Up to £6,000
	Second-hand ZEC	Not available	£6,000	Up to £6,000	Up to £6,000	Only available for new Zero Emissions Capable Vehicles
	Compliant Vehicle 6+ seats (Euro 4 petrol or Euro 6 diesel or better)	Up to £5,000	£5,000	Up to £5,000	Up to £5,000	Only available for new Zero Emissions Capable Vehicles
	Compliant Vehicle (Euro 4 petrol or Euro 6 diesel or better)	Up to £5,000	£3,000	Up to £3,000	Up to £3,000	Only available for new Zero Emissions Capable Vehicles

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[67] A Zero Emissions Capable (ZEC) Vehicle is defined as having CO_2 emissions of less than 50g/km and a zero emission range of at least 70 miles, as defined by Government, available at: https://www.gov.uk/plug-in-car-van-grants/eligibility

Greater Manchester's Clean Air Plan to Tackle Nitrogen Dioxide Exceedances at the Roadside

Appendix 2 - GM CAP EQIA following consultation - Evidence report - Oldham assessment

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Oldham Council

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Version Status:	Draft for approval	**Prepared by:**	Oldham Council
Reviewed by: **Date:**	20/06/21		

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

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1 Local Authority EqIA Appendix

1.1 Introduction

An Equality Impact Assessment (EqIA) has been developed at a Greater Manchester (GM) scale for the GM Clean Air Plan (GM CAP) in line with the public sector equality duty in section 149 of the Equality Act 2010.

The GM wide assessment builds on EqIAs that were published at the Outline Business Case stage in 2019 and the EqIA developed to support the consultation in late 2020. It considers the impacts on protected characteristics related to the implementation of CAZ C charging zone in GM and how implementation of the proposed package of mitigation measures addresses any identified equality impacts. This EqIA is an update following changes to the GM CAP policy made in consideration of feedback received during the consultation.

The EqIA is supported by an Equality Impact Evidence Report, appended to the EqIA[1].

1.2 Local Authority Assessment

This appendix to the GM EqIA includes an assessment of equality carried out by Oldham Council. The reasons for individual LA assessments include:

- To fulfil legal requirements placed on LAs to meet their duty under the Equality Act;
- To ensure that each of the LAs has considered and understood the full GM EqIA report and the context for the LA itself;
- To identify any LA baseline profile nuances or differences to that presented in the GM EqIA (Appendix A in the Equality Impact Evidence report).
- To review the assessment outcomes of the GM EqIA and identify whether impacts would be more or less significant within the LA areas;
- To highlight any geographical 'hot spots' with LA areas;
- To identify any actions LAs could take to mitigate and monitor equality impacts identified (specific to the LA area rather than applicable across GM as a whole).

1.3 Oldham's approach to Equality Impact

Oldham Council developed a standard approach to assessing Equality Impact to meet the requirements of the Public Sector Equality Duty,

[1] https://cleanairgm.com/technical-documents/

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consisting of an initial assessment, full assessment and an impact action plan. This is to ensure the authority has an understanding of our diverse communities and take account of their needs when designing policies and delivering services.

In addition to the Protected Characteristics identified in the GM CAP EqIA, Oldham Council also assesses Low Income in its Equality Impact Assessments.

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2 Oldham Council EqIA

2.1 Baseline data review

2.1.1 Introduction

We have considered the baseline data that is available at a Greater Manchester level and the Oldham specific data the overall finding and mitigations are comparable with the position in Oldham.

2.1.2 Baseline data updates

In- Scope Protected Characteristic	Overview for Oldham in relation to GM picture and any significant variation across the borough.	'Outliers' within the Local Authority (LSOAs or communities with a particularly high proportion of a protected characteristic)
Age	See "outliers" for ONS MYE 2019. There are significant age differentials across the borough, with older people particularly concentrated within more rural and geographically outlying wards.	See table 1 below
Disability	No updates since Census 2011. Picture is expected to be broadly similar to that across GM, with the proviso that with greater levels of deprivation there are likely to be higher proportions with limiting long term illness, and potentially more unpaid care being delivered.	NA
Pregnancy and Maternity	No known updates compared to the GM wide baseline report	NA
Race	2021 projections of ethnicity in Oldham are shown below, based on 2020 projection model. Oldham's demography is less diverse than that of Manchester, but more so than some other GM boroughs. Pakistani and Bangladeshi heritage communities have high levels of deprivation and form a high proportion of the taxi drivers within the borough, particularly within the Pakistani community.	NA

YEAR	*2021*
Population - All	246,200
White British and Irish	167,420
White Other	6,770

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In- Scope Protected Characteristic	Overview for Oldham in relation to GM picture and any significant variation across the borough.	'Outliers' within the Local Authority (LSOAs or communities with a particularly high proportion of a protected characteristic)
	Pakistani 29,420 Bangladeshi 21,670 Asian Other 5,050 Black 7,690 Mixed or other 8,170	
Religion	We have a larger percentage of Muslims in Oldham than the Greater Manchester average due to our large Bangladeshi and Pakistani communities.	NA
Sex	Gender split is expected to be in line with GM, and with no significant change since Census 2011.	NA
Transgender	We currently have no data on transgender population in Oldham to compare to numbers in Greater Manchester.	NA

Table 1: Population of over 65 years across Oldham

Ward Code	Ward Name	All Ages	65+	%
E05000719	Alexandra	15,020	1,410	9%
E05000720	Chadderton Central	11,108	2,005	18%
E05000721	Chadderton North	11,281	1,999	18%
E05000722	Chadderton South	11,299	1,855	16%
E05000723	Coldhurst	13,475	1,191	9%
E05000724	Crompton	10,215	2,650	26%
E05000725	Failsworth East	10,229	1,986	19%
E05000726	Failsworth West	10,405	2,127	20%
E05000727	Hollinwood	12,400	1,667	13%
E05000728	Medlock Vale	14,334	1,376	10%
E05000729	Royton North	9,831	2,438	25%
E05000730	Royton South	10,823	2,378	22%
E05000731	Saddleworth North	9,779	2,351	24%
E05000732	Saddleworth South	10,132	2,614	26%
E05000733	Saddleworth West and Lees	10,824	2,374	22%
E05000734	St James'	12,661	1,621	13%
E05000735	St Mary's	15,710	1,254	8%
E05000736	Shaw	10,183	2,164	21%
E05000737	Waterhead	13,395	1,670	12%
E05000738	Werneth	14,006	1,182	8%
	OLDHAM TOTAL	**237,110**	38,312	16%

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2.1.3 Socio-Economic Characteristics

Under the Equality Act, socio-economic characteristic is not a Protected Characteristic. As a result, the GM EqIA for CAP does not consider the impacts on the scheme on difference socio-economic groups. A Distributional Impact Assessment (DIA) has been undertaken for the programme which does consider these impacts.

Oldham does consider those on low income as part of its standard EqIA process but accepts and supports the GM view to not include in this case.

2.2 Equality impacts review

The following table summarises the equality impact assessment for the scoped-in characteristics for Oldham in relation to the GM assessment described in the GM CAP EqIA.

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Protected characteristic	Assessment topic	Impact (+/-)	Magnitude of impact post mitigation (extent of population exposure to impact)		Differential/ Disproportionate	Reason for difference in impact from GM assessment
			GM	Oldham		
Age	**Air quality**	**+**	**High**	**High**	**Differential**	No difference to GM assessment
	Accessibility	**-**	**Low**	**Low**	**Disproportionate**	No difference to GM assessment
	Affordability	-	**Low**	**Low**	**Disproportionate**	No difference to GM assessment
Disability[2]	**Air quality**	**+**	**High**	**High**	**Differential**	No difference to GM assessment
	Accessibility	**-**	**Low**	**Low**	**Disproportionate**	No difference to GM assessment
	Affordability	**-**	**Low**	**Low**	**Disproportionate**	No difference to GM assessment
Pregnancy and maternity	**Air quality**	**+**	**High**	**High**	**Differential**	No difference to GM assessment
	Accessibility	No equality impact				
	Affordability	No equality impact				
Race[3]	**Air quality**	**+**	**High**	**High**	**Disproportionate**	As we have a large number of BME residents residing in the St. Mary's, Alexandra, Werneth and Coldhurt, which are also wards with Air Quality

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[2] **Disability covers a wide range of physical and mental impairment. Where the impact would differ dependent on disability this is flagged in the narrative.**
[3] **Race covers all races identified within the ONS dataset. Where the impact would differ for different races, this is identified in the narrative.**

Protected characteristic	Assessment topic	Impact (+/-)	Magnitude of impact post mitigation (extent of population exposure to impact)		Differential/ Disproportionate	Reason for difference in impact from GM assessment
			GM	Oldham		
						Management areas in them, this positive impact may be greater in Oldham.
	Accessibility	**-**	**Low**	**Low**	**Disproportionate**	No difference to GM assessment
	Affordability	**-**	**Low**	**Medium**	**Disproportionate**	We have a larger percentage of BME residents in Oldham than the Greater Manchester average due to our large Bangladeshi and Pakistani communities, a high number of which work in the taxi trade, therefore anything that effects affordability in this sector may have a higher disproportionate effect in Oldham than in Greater Manchester.
Religion[4]	Air quality	**+**	**?**	**High**	**Differential**	As we have a large number of Muslim residents residing in the St. Mary's, Alexandra, Werneth and Coldhurt, which are also wards with Air Quality Management areas in them, this positive impact may be greater in Oldham.
	Accessibility	No equality impact				
	Affordability	**-**	**Low**	**Medium**	**Disproportionate**	We have a larger percentage of Muslims in Oldham than the Greater Manchester average due to our large Bangladeshi and Pakistani communities, a high number of which work in the taxi trade, therefore anything that effects affordability in this sector may have a higher disproportionate effect in Oldham than in Greater Manchester.

[4] religion covers all religions identified within the ONS dataset. Where the impact would differ for different religions, this is identified in the narrative.

Protected characteristic	Assessment topic	Impact (+/-)	Magnitude of impact post mitigation (extent of population exposure to impact)		Differential/ Disproportionate	Reason for difference in impact from GM assessment
			GM	Oldham		
Sex	**Air quality**	**No equality impact**				
	Accessibility	**No equality impact**				
	Affordability	**-**	**Medium**	**Medium**	**Disproportionate**	Taxi drivers, PHV drivers and bus drivers are over 90% more likely to be male than female. Any business costs are therefore likely to be disproportionately experienced by men.
Gender Reassign-ment	Air quality	**No equality impact**				
	Accessibility	**-**	**Low**	**Low**	**Differential**	No difference to GM assessment
	Affordability	**No equality impact**				
Sexual orientation	Air quality	**No equality impact**				
	Accessibility	**-**	**Low**	**Low**	**Differential**	No difference to GM assessment
	Affordability	**No equality impact**				

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2.3 'Hot-spots' in your Local Authority

2.3.1 Geographical 'hot-spots' in Oldham

A high proportion of Oldham's Air Quality Management area is due to roads operated/managed by Highways England as part of the strategic road network (SRN), such as the M60 motorway. The M60 will not be part of the GM CAZ charging scheme so potentially residents living close to the SRN in Chadderton South, Hollinwood, and Failsworth East may therefore not benefit as much from a reduction in Nitrogen Dioxide levels as the rest of the Borough.

Oldham has a higher percentage of it's over 65's in wards in the North and East of the Borough. The wards in the East i.e. Saddleworth North, South and West are particularly rural and cover a large geographical area, so people without their own access to private vehicles in these areas may be more reliant on public transport and taxis for essential journeys. If the result of the CAZ is an increase in taxi and bus fares or reduction in services people in this area could be disadvantaged with potentially the over 65 disproportionately affected, although the travel pass for Older People in Greater Manchester may reduce this impact for some. These areas also do not suffer from elevated levels of air pollution so the benefit to the over 65's in these areas will not be as great.

A large percentage of Oldham's Air Quality Management area is centred in the Coldhurst, Werneth, St. Mary's and Alexandra wards, so the population that live in these areas should benefit most from improved Air Quality in terms of potential health benefits. A high percentage of the population in these areas are from BME groups, so potentially this may have a more positive impact on BME population then in the rest of the Greater Manchester area. Conversely these are currently also some of the most deprived wards, so residents here may be more likely to use public transport and taxis and therefore be more economically affected if the CAZ results in bus and taxi fare rises or a reduction in services.

2.3.2 Protected characteristic 'hot-spots' in Oldham

As can be seen from the information in the table below, most of the taxi drivers licenced with Oldham also reside in the borough. As previously stated, Pakistani and Bangladeshi heritage communities form a high proportion of these taxi drivers, particularly within the Pakistani community. The vast majority of these are also likely to be from the Muslim faith with a great many residing in the Werneth, Medlock Vale, Alexandra and St. Mary's wards.

If the result of the CAZ means that taxi drivers are disproportionality affected from an affordability aspect, e.g. paying the daily CAZ charge or

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having to change vehicle earlier than expected, then these communities in these wards may be greater impacted by this effect

Data on Oldham taxi drivers:

Type of Vehicle	Number licensed
Hackney Carriage	85
Private Hire	959
TOTAL	**1044**

Age Range	Number of drivers
21-29	76
30-39	377
40-49	480
50-59	294
60+	185

Resides	Number of drivers
In Oldham	1278
Out of Borough	173

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2.4 Actions to be taken by Oldham

2.4.1 Mitigate any potential equality impacts identified.

The council will promote the various funds, finance scheme, exemptions and discounts available to businesses, including taxi and private hire drivers/operators and bus operators and encourage the take up of such schemes via, social media, the chamber of commerce and the taxi licensing teams interaction with drivers and operators.

We will lobby Highways England to take action to improve the air quality from the M60 to ensure that residents living close to the M60 also see an improvement in air quality.

2.4.2 Monitor any potential equality impacts identified.

We will monitor any changes to number of licenced taxi and hackney carriage drivers and operators in the borough.

We will monitor the percentage change in number of Wheelchair Accessible Vehicles in Hackney Carriage and Private hire fleet.

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We will monitor the number of applications from Oldham based businesses and private individuals, like Hackney and private hire drivers for Clean Funds and vehicle finance to examine how they compare to the other GM areas.

We will continue to monitor the air quality across the borough, including in residential areas close to the M60.

We will utilise any commissioned resident's survey.

2.4.3 Review any potential equality impacts identified.

We will continue to annually review the air quality levels in the borough via the Annual Status Report on Air Quality.

Review monthly the take up of Clean Funds and vehicle finance by Oldham based businesses and individuals.

Review feedback from resident's surveys.

2.4.4 Outline local monitoring and review plan.

To be developed during the Prepare to Operate phase.

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Greater Manchester's Clean Air Plan to Tackle Nitrogen Dioxide Exceedances at the Roadside

Appendix 2 – GM CAP Equality Impact Assessment following Consultation

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Version Status:	Draft for approval	**Prepared by:**	Transport for Greater Manchester on behalf of the 10 Local Authorities of Greater Manchester
Date:	20 June 2021		

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1 Introduction

1.1 This report is the Equality Impact Assessment (EqIA) to support the post consultation process for the Greater Manchester Clean Air Plan (GM CAP).

1.2 The assessment considers the potential for the GM CAP to result in disproportionate or differential equality effects on people with protected characteristics.

1.3 Transport for Greater Manchester (TfGM) is coordinating the development of the GM CAP on behalf of the ten local authorities and this report utilizes TfGM's EqIA report format, set out in two sections (Section 1: Initial Screening and Section 2: Full Equality Analysis).

1.4 This assessment builds on the EqIA document that was published to support the GM CAP Consultation between October and December 2020. It assesses the GM CAP measures detailed in the GM CAP Policy that has been updated to reflect GM's response to the consultation and will support the production of the Full Business Case (FBC) later in 2021.

1.5 This report is supported by an Equality Impact Evidence Report for the GM CAP (Appendix of this document). Each of the Greater Manchester Local Authorities have developed a specific report for their particular districts, highlighting significant equality differences in comparison to the GM-wide findings. The ten local reports are contained in appendices to the Equality Impact Evidence Report.

2 Scope of an Equality Impact Assessment

2.1 An EqIA is a recognised, specific process, used to inform the development of policies in order to facilitate maximum positive outcomes and to avoid or minimise adverse impacts on particular groups.

2.2 An EqIA considers the impact on nine protected characteristics:

1. age;
2. disability;
3. gender reassignment;
4. marriage and civil partnership;
5. pregnancy and maternity;
6. race;
7. religion or belief;
8. sex; and
9. sexual orientation.

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2.3 An EqIA does not directly consider the impact on those communities that are economically disadvantaged or that have high level of social deprivation, unless there is a clear correlation with a protected characteristic. Economic impacts of the CAP are considered in the post-consultation Economic Implications of the GM CAP report and in the updated Distributional Impacts Assessment report that will support the FBC.

2.4 Some of the local authorities in GM do include socio-economic deprivation or low-income households as a characteristic within their Equality Policy. In these cases, socio-economic disadvantage is considered in their EqIA assessment as part of the Equality Impact Evidence Report for the GM CAP (See Appendix).

2.5 In addition, some of the local authorities consider other protected characteristics in their EqIA assessments, such as carers and veterans, in line with their local Equality Policy,

3 Requirement of public bodies:

3.1 Under Section 149 of the Equality Act (2010), public bodies are subject to the Public Sector Equality Duty, which requires that, they have due regard to the need to:

a) Eliminate discrimination, harassment, victimisation, and any other conduct that is prohibited by or under the Act;

b) Advance equality of opportunity between persons who share a protected characteristic and persons who do not share it; and

c) Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

3.2 The aim of the EqIA is to identify whether people with protected characteristics could be affected by the GM CAP disproportionately or differentially:

- **Disproportionate effects** arise when an impact has a proportionately greater effect on people with protected characteristics than the rest of the population.
- **Differential effects** arise where people with protected characteristics could be affected differently from the rest of the population, due to a particular need or sensitivity.

4 Final Plan Policy Since the Proposals at Consultation

4.1 The proposed final GM Clean Air Plan does not include a Hardship Fund, as proposed at consultation. Although feedback from the consultation and the impact of COVID-19 research found that further support was required for GM businesses, Government Ministers did not agree that a Hardship Fund would be the best way to mitigate the impact of uncertainty due to the pandemic. Ministers cited other COVID-response government schemes (not specific to Clean Air plans) being available to address wider business impacts.

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4.2 However, Government have confirmed that they wish to ensure that Clean Air Funds can be adapted if necessary; and, that they will continue to work with GM to understand the situation, including the funding position, if the impacts prove to be more severe than forecast.

4.3 It remains important to monitor the impact of the CAZ on individuals and businesses that are economically vulnerable and their ability to access the available package of Clean Funds and Vehicle Finance.

4.4 The proposed final GM Clean Air Plan does not include a 5/7 discount for GM-licensed PHVs, as proposed at consultation. From an equality perspective, in isolation the removal of the discount would impact PHV drivers, a high proportion of whom are male and from minority ethnic groups[1]. However, rather than offering a discount, GM is proposing a temporary exemption to the daily charges of the CAZ until 31 May 2023 for all GM-licensed Private Hire Vehicles and Hackney Carriages and further options for replacement and retrofit are more suitable revisions to the scheme to meet the air quality objectives.

5 Conclusion

5.1 The assessment concludes that improved air quality resulting from the GM CAP will have a disproportionate benefit for many protected characteristic groups namely, pregnancy and maternity; older people, young people and children; those with disability or ill-health; and those from minority ethnic and faith groups who are more likely to live in deprived neighbourhoods.

5.2 It also concludes that, despite the proposed package of mitigating measures, there is the risk of residual adverse impacts on some protected characteristic groups in relation to personal and business affordability: gender (male drivers), minority ethnic and faith groups. A potential, residual adverse impact in relation to accessibility was also concluded for those with following protected characteristics: older and young people; disability; gender reassignment and sexual orientation. Overall, the assessment recognises that a significant package of temporary and permanent exemptions, discounts and funds has been put in place and that these have reduced the potential negative impact on protected characteristic groups. Having regard to the benefits of the GM CAP the proposals are considered to be justified notwithstanding the remaining risk of disproportionate or differential impacts on protected characteristic groups.

5.3 Promotion and accessibility of the mitigating measures to protected characteristic groups will be key to ensuring that those impacted are fully aware of and able to benefit from the support available.

[1] Both licensed PHVs and Hackney Carriages can only be driven by a licensed driver – a vehicle used for taxi services is always a licensed taxi. Therefore, at all times it is a licensed vehicle, rather than a private car. After consideration of the feedback from consultation, GM considered that offering PHVs a discount did not provide parity with other commercial vehicles which are sometimes also used for private travel.

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5.4 To fulfil their duty under the Equality Act, each of the ten local authorities has undertaken a local assessment and reported any significant variances against the GM-wide assessment, these can be found in the supporting GM CAP Equality Impact Evidence report (see Appendix).

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Transport for Greater Manchester

Equality Impact Analysis

Section one: Initial Screening

Department	Transport Strategy
Team or Service Area	Clean Air Project
Officer completing the analysis	ARUP
Phone	
Email	

Type of activity	Project
Title of activity	GM Clean Air Plan to tackle Nitrogen Dioxide Exceedances at the Roadside

Under current equality legislation, TfGM and the ten Greater Manchester local authorities are required in the exercise of our functions to have due regard for the need to:

- *eliminate unlawful discrimination, harassment and victimization*
- *advance equality of opportunity between persons who share a relevant characteristic, and persons who do not share it; and*
- *foster good relations between those who have a protected characteristic and those who don't.*

Equality Analysis (formally referred to as Equality Impact Analysis (EQIA)) is a tool that will help you to consider equalities issues when drawing up or reviewing a strategy, project, policy, process or procedure which affects the delivery of services and the employment practice of Transport for Greater Manchester (TfGM). Equality Analysis will improve the work of TfGM by making sure it does not unlawfully discriminate against people and that it fulfils its duties under current equality legislation and where possible, it promotes equality.

You will need to demonstrate where appropriate that there has been engagement with beneficiary groups and at the end of this analysis you will need to provide documentary evidence of all the information you have taken into account during this process.

Question 1:

Is this a new or existing activity?

Existing.

An Outline Business Case was written in support of the GM CAP in February 2019. Since this time the GM CAP Policy has been developed and refined in response to stakeholder engagement. This assessment builds on the EqIA developed to support the statutory consultation in October – December 2020 and assesses the potential impact of the resulting GM CAP Policy on protected characteristics.

Question 2:

What is the main aim and purpose of the activity?

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The government has instructed many local authorities across the UK to take quick action to reduce harmful Nitrogen Dioxide (NO_2) to within legal limit values in the "shortest possible time". In Greater Manchester, the 10 local authorities, the Greater Manchester Combined Authority (GMCA) and Transport for Greater Manchester (TfGM), collectively referred to as "Greater Manchester" or "GM", have worked together to develop a Clean Air Plan to tackle NO_2 Exceedances at the Roadside, referred to as GM CAP. TfGM is coordinating the development of the GM CAP on behalf of the ten local authorities.

The primary objective of the GM CAP is to achieve compliance with legal limit values in the shortest possible time. In line with Government guidance, this is the Determining Success Factor by which the programme is appraised.

A feasibility study was undertaken, and an outline business case was completed in 2019. Following this, a package of detailed GM CAP measures was developed and refined. As required by the Transport Act 2000, a statutory consultation on these detailed proposals, including the proposed charging CAZ, was undertaken between 8 October and 3 December 2020[2]. The feedback from the consultation has now been considered and has informed proposed changes to the CAP measures that are reflected in the GM CAP Policy being assessed in this EqIA.

This EqIA is one of a package of reports that supports the GM Authorities Response to the Consultation and the development of the Full Business Case (FBC) for the GM CAP. [3]

Question 3:

List the main elements of the activity?

The GM CAP proposes a charging Class C Clean Air Zone (CAZ)[4], with additional measures to tackle nitrogen dioxide exceedances. Under a Class C CAZ owners or registered keepers of the following vehicle types are required to pay a daily charge for driving within the zone, if the vehicle does not comply with the required vehicle emission standards in the Government's Clean Air Zone Framework[5]:

- Buses
- Coaches
- Heavy Goods Vehicles (HGVs)
- Light Goods Vehicles (LGVs)
- Minibuses
- Licensed Hackney Carriages
- Licensed Private Hire Vehicles (PHVs)

Vehicles which meet the relevant emissions standards will not be subject to charges. A Clean Air Zone Class C does **not** include charging in respect of private cars and motorbikes.

Within the GM CAP, additional measures are proposed to support the transition to compliant vehicles and tackle nitrogen dioxide exceedances in the shortest possible time. These include funds and finance for the retrofit and/or replacement of buses, taxis and commercial vehicles which do not meet the emissions standards required by the CAZ.

The set of supporting measures within the GM CAP Policy are specifically:

- Clean Bus Fund

[2] https://cleanairgm.com/clean-air-plans
[3] https://cleanairgm.com/technical-documents/
[4] The Clean Air Zone Framework (May 2017), Dept of Transport and DEFRA classifies Clean Air Zones as being either Class A, Class B or Class C. Class C includes buses, coaches, taxis, PHVs, HGVs and light goods vehicles (LGVs).
[5] Department for Environment, Food & Rural Affairs and Department for Transport. 2020. Clean Air Zone Framework. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/863730/clean-air-zone-framework-feb2020.pdf

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- Clean Commercial Vehicle Fund
- Clean Taxi Fund
- Vehicle Finance
- Taxi Electric Vehicle Infrastructure

Question 4:

If this is a new / proposed activity or a change to an existing activity, please explain why the proposal is being made / for what reason?

This assessment builds on the EqIA document that was published to support the GM CAP Consultation between October and December 2020. It assesses the GM CAP measures detailed in the GM CAP Policy that has been updated to reflect GM's response to the consultation and will support the production of the Full Business Case (FBC) later in 2021.

This document is supported by an Equality Impact Evidence Report (see Appendix). The Equality Impact Evidence Report includes appendices from each of the ten GM local authorities, highlighting any specific considerations and variations that apply to each borough.

Question 5:

What outcomes does the activity aim to achieve?

An implementation plan that sets out the measures proposed to address nitrogen dioxide exceedances in Greater Manchester which has been developed collectively by all Greater Manchester local authorities, and co-ordinated by TfGM, in line with Government direction and guidance.

Question 6:

Who are, or will be, the main beneficiaries of the activity?

Please tick one or more of the following

Travelling public	Yes
TfGM staff	No
Partners including Operators	No
Suppliers	No
Others – please specify	Yes All people living , working and travelling into and within Greater Manchester

Question 7:

Do you need to consult with people who might be affected by it directly or indirectly? Please justify your response

A programme of research, analysis and public and stakeholder engagement has taken place since early 2019. A public 'conversation' on the outline proposals ran from 13 May 2019 to 30 June 2019, seeking wide-ranging feedback from the general public, businesses and stakeholders on the proposed measures for achieving compliant NO2 levels in Greater Manchester. Around 3,300 responses were received over the seven-week period, including responses from umbrella groups representing more than 50,000 members. Around 70% of the responses were residents of Greater Manchester and 16% were businesses in Greater Manchester. These results, along with outputs from wider stakeholder engagement with a range of groups, were used to inform the development of more detailed proposals for statutory consultation.

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As required by the Transport Act 2000, a statutory consultation on these detailed proposals, including the proposed charging CAZ, was undertaken between 8 October and 3 December 2020[6]. A total of 4,768 responses were received to the consultation from across and outside of GM[7]. Members of the public made up 3,858 of the responses.

441 responses were also received from businesses, with a further 343 from taxi[8] drivers or operators and 124 from representatives. Additional in-depth interviews, including with taxi drivers and focus groups were carried out.

The feedback from the consultation has been considered and has informed changes to the CAP measures that are reflected in GM CAP Policy being assessed in this EqIA. More detail can be found in the GM Authorities' Response to the Consultation report[9].

Question 8:

Having due regard for the equality duty involves: Removing or minimising disadvantages suffered by people due to their protected characteristics; Taking steps to meet the needs of people with certain protected characteristics where these are different from the needs of other people; Encourage people with certain protected characteristics to participate in public life or in other activities where their participation is disproportionately low. Please complete the table below and give reasons, evidence and comment, where appropriate, to support your judgement(s).

Use the table below to record where you think that the activity could have a positive impact on any of the target groups or contribute to promoting equality, equal opportunities or improving relations within equality target groups. Use the table below to record where you think that the activity could have an adverse impact on any of the equality target groups i.e. it could disadvantage them and impact is high. - Use the last column in the table below to give reason/comments/evidence where appropriate to support your judgement.

It is important to note here that the Covid-19 pandemic has unquestionably highlighted areas of inequality within our society, with those who are already the most vulnerable to health and economic shocks having been most affected. The added economic strain caused by the pandemic on those who are already economically disadvantaged or more vulnerable means that further economic pressures are likely to be experienced more acutely by these individuals, communities and businesses.

The Covid-19 pandemic has already impacted on the timelines for implementing the CAZ, resulting in the implementation of the CAZ being delayed from 2021 to 2022.

Market analysis has been undertaken on the impact of the Covid-19 pandemic on businesses and individuals affected by the CAZ, and the statutory consultation in late 2020 explored the issue further. A report summarising the impact of Covid-19 on the GM CAP has been developed[10]. The findings have been considered, the CAP measures refined and fed into the current draft GM CAP Policy which is the basis of this EqIA.

In assessing the equality impacts of the GM CAP, the impacts of Covid-19 are acknowledged as likely to make some of the protected characteristics more vulnerable to the potential unintended consequences of the CAZ. The GM Independent Inequalities Commission report,[11] published in March 2021, highlights the disproportionate impact of Covid-19 on communities with protected characteristics including "*Workers from 'Other White' ethnic groups were more likely to have lost take-home pay than White British or people of Indian heritage; people from Pakistani, Bangladeshi, Chinese or Other Asian ethnicities were more likely than White British people to worry about their future financial situation[12]*".

[6] https://cleanairgm.com/clean-air-plans
[7] https://cleanairgm.com/technical-documents/
[8] In this report – the term 'taxi' refers to both hackney carriages and private hire vehicles
[9] https://cleanairgm.com/technical-documents/
[10] https://cleanairgm.com/technical-documents/
[11] https://www.greatermanchester-ca.gov.uk/media/4337/gmca_independent-inequalities-commission_v15.pdf
[12] National data, sourced from Office for National Statistics Why have Black and South Asian people been hit hardest by Covid-19? (December 2020).

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Age			
Target Group	Positive Impact	Adverse Impact	Comment or Evidence
Children and Young People (aged 19 and under)	High	Low	Young people are more sensitive to changes in air quality and will therefore benefit more quickly from improvements in air quality. Young people should therefore benefit differentially from the CAZ. Young people are more reliant on public transport and taxis and may also be more likely to use minibuses and community transport. TfGM's travel diary survey (GM TRADs) years 6,7,8 (2017-2019) shows a higher proportion of bus users amongst people aged 19 and under compared to the GM average. Any changes in provision would have a disproportionate impact on this group in relation to access. Young people are more reliant on public transport and taxis to transport them to places of work, education, and social/leisure activities. Increased travel costs incurred would disproportionately impact this group in terms of affordability.
Older People (aged 60 and over)	High	Low	Older people are more sensitive to changes in air quality and will benefit more quickly from improvements in air quality therefore having a differential effect. Older people are more reliant on public transport and taxis and may also be more likely to use minibuses and community transport. GM TRADs years 6,7,8 shows slightly higher than average proportion of bus users amongst people aged 60 and over. A retired person with no access to a car is over twice as likely than average to regularly use buses (GM Segmentation – Insights into bus use, Steer Davies Gleave, 2018). Any changes in provision or fare increases would have a disproportionate impact on this group in terms of access and affordability. Older people are more reliant on public transport and taxis to transport them to

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			places of health services and social/leisure activities. Increased travel costs incurred would disproportionately Over 25% of taxi drivers in GM are over 55 years old (according to a Census carried out in 2020) and the average age of HGV drivers is 57 years according to the Road Haulage Association, therefore any business affordability impacts resulting from the CAZ will have an impact in terms of age.

Disability			
Target Group	Positive Impact	Adverse Impact	Comment or Evidence
People with physical impairments (includes mobility, co-ordination, lifting and carrying, manual dexterity, wheelchair user)	High	Low	People with certain disabilities (particularly if these relate to respiratory problems) are likely to be more sensitive to changes in air quality and will benefit more quickly from improvements in air quality. This would be a differential effect. People with physical impairments are more reliant on public transport and taxis because they are more likely to not drive. GM TRADs (TRADs years 678) shows a slightly higher proportion of bus users amongst people with a physical impairment compared to those with no disability or impairment. Analysis of the GM Bus Passenger Survey (2016) found that disabled respondents (with a range of disabilities) were more likely to be reliant on buses and travel on buses due to a lack of other options, than other respondents (Bus Passenger Survey, Transport Focus, 2016). This group are also more likely to use community transport. Any changes in provision would have a disproportionate impact on this group in terms of accessibility to services, work and social activities. Disabled people are more reliant on public transport and taxis to transport them to places of work, education, and social/leisure activities. Increased travel costs incurred would disproportionately

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			impact this group in terms of personal affordability. Some people with disabilities require access to LGV style / adapted vehicles to ensure their independence and/or access to services and leisure. Inclusion of such vehicles in the CAZ could impact on accessibility or affordability for these people.
People with communication or sensory impairments (includes blind/partially sighted, deaf/ hard of hearing, difficulty speaking	Medium	Low	People with communication or sensory impairments are more reliant on public transport and taxis because they are more likely to not drive. GM TRADs (TRADs years 678) shows a higher proportion of bus users amongst people with a communication or sensory impairments compared to those with no disability or impairment. They are also more likely to use community transport. Any changes in provision would have a disproportionate impact on this group in terms of accessibility to services, work and social activities. Disabled people are more reliant on public transport and taxis to transport them to places of work, education, and social/leisure activities. Increased travel costs incurred would disproportionately impact this group in terms of personal affordability.
People with a learning disability or cognitive impairment (includes conditions which affect ability to learn, understand, read, remember and concentrate e.g. Down Syndrome, autism, ADA)	Medium	Low	People with a learning disability or cognitive impairments are more reliant on taxis and public transport, because they are more likely to not drive. GM TRADs (TRADs years 678) shows a higher proportion of bus users amongst people with a learning disability or cognitive impairment compared to those with no disability or impairment. They are also more likely to use community transport. Any changes in provision would have a disproportionate impact on this group in terms of accessibility to services, work and social activities. Disabled people are more reliant on public transport and taxis to transport them to places of work, education, and social/leisure activities. Increased travel

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			costs incurred would disproportionately impact this group in terms of personal affordability.
People with mental health problems (includes depression, schizophrenia)	Medium	Low	People with mental health problems might be more reliant on taxis and public transport, because they are more likely to not drive. GM TRADs (TRADs years 678) shows a higher proportion of bus users amongst people with a mental health problem compared to those with no disability or impairment. They are also more likely to use community transport. Any changes in provision would have a disproportionate impact on this group in terms of accessibility to services, work and social activities. Disabled people are more reliant on public transport and taxis to transport them to places of work, education, and social/leisure activities. Increased travel costs incurred would disproportionately impact this group in terms of personal affordability.
Other disability / impairment not covered by any of the above			No other groups identified
Gender			
Target Group	Positive Impact	Adverse Impact	Comment or Evidence
Men	Medium	Medium	Drivers of all the vehicle types subject to the CAZ charge are significantly more likely to be male than female (92% of drivers overall are men with 94% of coach and bus drivers and 96% of taxi drivers being male), and therefore disproportionately more likely to feel the impact of the CAZ in terms of both personal and business affordability.
Women	Medium	Low	GM TRADs years 678, has shown that more women make bus trips than men. Equally, TfGM research has found that women make more trips overall (GM TRADs years 678) and have more activities they rate as important to access than men (TfGM, Access and Inclusion, 2020).
Transgender People	Medium	Low	There is anecdotal evidence to suggest that transgender individuals are more likely to access taxi services in order to

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			safely access services and particularly the night- time economy in the city centre. This group could therefore be disproportionately impacted by changes in service or cost as a result of the CAZ.

Pregnancy and Maternity			
Target Group	Positive Impact	Adverse Impact	Comment or Evidence
People who are pregnant	High	---	Extremely low-dose exposures to pollutants during windows of vulnerability in utero and in early infancy may result in health effects throughout their lifespan.
People who have given birth in the last 26 weeks	High	---	Extremely low-dose exposures to pollutants during windows of vulnerability in utero and in early infancy may result in health effects throughout their lifespan.

Race			
Target Group	Positive Impact	Adverse Impact	Comment or Evidence
Asian or Asian British Backgrounds (This includes Pakistani, Indians and Bangladeshi, Chinese or any other Asian background)	High	Medium	Areas of existing high pollution in GM often correlate with low-income communities and therefore any improvements in air quality would benefit these communities disproportionately. These communities often have greater populations of people from minority ethnic backgrounds, so improvements in air quality could benefit minority ethnic groups disproportionately. Over 50% of all hackney and PHV drivers in England are from a non-white British ethnic background and so any CAZ impacts in terms of business affordability will impact minority ethnic groups, and particularly Asian or Asian British groups disproportionately. Analysis of the responses to the GM CAP consultation indicated a high proportion from Asian drivers, concerned about the financial impact of the CAZ particularly in light of reduced business resilience following the Covid-19 pandemic. People from more disadvantaged communities, including those from minority ethnic groups are less likely to own a car and be more reliant on public transport and taxis. Therefore, any change in cost or frequency of services will impact these groups disproportionately.
Black or Black British Backgrounds (This includes Caribbean,	High	Low	Areas of existing high pollution in GM often correlate with low income communities and therefore any improvements in air quality would benefit these

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African or any other black background)			communities disproportionately. These communities often have greater populations of people from minority ethnic backgrounds, so improvements in air quality could benefit minority ethnic groups disproportionately. GM TRADs (TRADs years 678) shows people from Black or Black British backgrounds in GM are more likely than average to be bus users and are more likely than average to use the bus frequently (five or more days a week). Census figures also show this group are more likely than average to use the bus to access work in GM (Census 2011). People from Black or Black British backgrounds in GM are also less likely than average to have access to a car (Census 2011) Over 50% of all taxi drivers in England are from a non-white British ethnic background and so any CAZ impacts in terms of business affordability will impact minority ethnic groups disproportionately. Response to the consultation indicated that drivers and businesses are more vulnerable to business cost increases following the economic effect of the Covid-19 pandemic. People from more disadvantaged communities, including those from minority ethnic groups are less likely to own a car and be more reliant on public transport and taxis. Therefore, any change in cost or frequency of services will impact these groups disproportionately.
Mixed /Multiple Ethnic Groups (This includes White and Black Caribbean, White and Black African, White and Asian or any other mixed background)	High	Low	Areas of existing high pollution in GM often correlate with low-income communities and therefore any improvements in air quality would benefit these communities disproportionately. These communities often have greater populations of people from minority ethnic backgrounds, so improvements in air quality could benefit minority ethnic groups disproportionately. Over 50% of all taxi drivers in England are from a non-white British ethnic background and so any CAZ impacts in terms of business affordability will impact minority ethnic groups disproportionately. Response to the consultation indicated that drivers and businesses are more vulnerable to business cost increases following the economic effect of the Covid-19 pandemic. People from more disadvantaged communities, including those from minority ethnic groups are less likely to own a car and be more reliant on public transport and taxis. Therefore, any change in cost or frequency of services will impact these groups disproportionately.

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White British Background (This includes English, Scottish & Welsh, Irish and Gypsy or Irish Travellers)	Medium	Low	Gypsy or Irish traveller communities often rely on LGV and/or HGV vehicles for income. Anecdotally, these vehicles are older and may not be compliant. In addition, these communities are more removed from local communication channels, and may be less likely to apply for and received funds or finance offered under the CAP. Therefore, this group could be disproportionately impacted by the CAZ.
Non-British White Backgrounds (This includes Irish, Polish, Spanish, Romanians and other White backgrounds)	Medium	Low	Areas of existing high pollution in GM often correlate with low-income communities and therefore any improvements in air quality would benefit these communities disproportionately. These communities often have greater populations of people from minority ethnic backgrounds, so improvements in air quality could benefit minority ethnic groups disproportionately.
Arabs	High	Low	Areas of existing high pollution in GM often correlate with low-income communities and therefore any improvements in air quality would benefit these communities disproportionately. These communities often have greater populations of people from minority ethnic backgrounds, so improvements in air quality could benefit minority ethnic groups disproportionately. Over 50% of all taxi drivers in England are from a non-white British ethnic background and so any CAZ impacts in terms of business affordability will impact minority ethnic groups disproportionately. People from more disadvantaged communities, including those from minority ethnic groups are less likely to own a car and be more reliant on public transport and taxis. Therefore, any change in cost or frequency of services will impact these groups disproportionately.
Any other ethnic background not covered by any of the above	---	---	No other group identified.
Religion/Belief			
Target Group	Positive Impact	Adverse Impact	Comment or Evidence
Buddhists	High	---	Areas of existing high pollution in GM often correlate with low-income communities and therefore any improvements in air quality would benefit these communities disproportionately. These communities often have greater populations of people from minority faith backgrounds, so improvements in air quality could benefit these faith groups disproportionately.

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Christians	Medium	---	No disproportionate or differential adverse impacts found.
Hindus	High	Medium	Areas of existing high pollution in GM often correlate with low-income communities and therefore any improvements in air quality would benefit these communities disproportionately. These communities often have greater populations of people from minority faith backgrounds, so improvements in air quality could benefit these faith groups disproportionately. Over 50% of taxi drivers in England are from non-white ethnic groups, and there was a strong Asian response to the GM CAP consultation. Therefore, it is possible there may be a disproportionate affordability impact on Hindu communities as a result of the CAP. It should be noted that no clear quantitative data was identified to directly support this.
Jews	Medium	Low	Areas of existing high pollution in GM often correlate with low-income communities and therefore any improvements in air quality would benefit these communities disproportionately. These communities often have greater populations of people from minority faith backgrounds, so improvements in air quality could benefit these faith groups disproportionately. There is anecdotal evidence of high use by some Jewish communities in GM, particularly in Salford, of LGV vehicles to support small and micro businesses. Any impact of the CAZ on business affordability would impact on this community.
Muslims	High	Medium	Areas of existing high pollution in GM often correlate with low-income communities and therefore any improvements in air quality would benefit these communities disproportionately. These communities often have greater populations of people from minority faith backgrounds, so improvements in air quality could benefit these faith groups disproportionately. Consultation responses indicated a high correlation between Asian Hackney and PHV drivers in GM and the Muslim faith. Therefore, affordability impacts on taxi drivers and operators would impact on those of Muslim faith disproportionately.
Sikhs	High	Medium	Areas of existing high pollution in GM often correlate with low-income communities and therefore any improvements in air quality would benefit these communities disproportionately. These communities often have greater populations of people from minority faith backgrounds, so improvements in air

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			quality could benefit these faith groups disproportionately. Over 50% of taxi drivers in England are from non-white ethnic groups, and there was a strong Asian response to the GM CAP consultation. Therefore, it is possible there may be a disproportionate affordability impact on Sikh communities as a result of the CAP. It should be noted that no clear quantitative data was identified to directly support this.
Others	---	---	

Sexual Orientation			
Target Group	Positive Impact	Adverse Impact	Comment or Evidence
Gay men	Medium	Low	There is anecdotal evidence to suggest that gay men are more likely to access taxi services in order to safely access services and particularly the night- time economy in the city centre. This group could therefore be disproportionately impacted by changes in service or cost as a result of the CAZ.
Lesbians	Medium	Low	There is anecdotal evidence to suggest that lesbians are more likely to access taxi services in order to safely access services and particularly the night- time economy in the city centre. This group could therefore be disproportionately impacted by changes in service or cost as a result of the CAZ.
Bisexual	Medium	Low	There is anecdotal evidence to suggest that bi-sexual individuals are more likely to access taxi services in order to safely access services and particularly the night- time economy in the city centre. This group could therefore be disproportionately impacted by changes in service or cost as a result of the CAZ.

Marriage and Civil Partnership			
Target Group	Positive Impact	Adverse Impact	Comment or Evidence
Marriage and Civil Partnership	---	----	This protected characteristic was out of this assessment as it was assessed that no disproportionate or differential impact would be felt.

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Question 9:

If this activity involves new build or alteration to existing building, has any consideration been given to provision of a multi-faith room

Not applicable

Question 10:

Have you identified two or more high adverse impacts in the table above

No

Question 11:

If you have identified one high adverse impact or any medium / low adverse impacts, what improvements to the activity would / could you make to mitigate high/medium/low adverse impact? Please give details of the improvements you plan to make

There is a significant package of measures within the GM CAP Policy to mitigate the potential unintended impacts of the charging CAZ, strengthened in response to the consultation feedback. These have already been considered in the assessment of equality impacts on specific protected characteristics above. Ensuring that those with protected characteristics who are adversely impacted by the GM CAP fully understand and feel that they have access to these mitigating measures is key to take up and to ultimately mitigating equality impacts.

Access to Funding, Discounts and Exemptions

The Funding, Discounts and Exemptions will play a crucial role in mitigating the affordability and accessibility impacts highlighted in this assessment. It is important that the following are considered in their development:

- **Digital exclusion:** Digital channels are to be the principle routes to access information and applications to the Funding, Discounts and Exemptions. The EqIA has highlighted that some protected characteristic groups impacted by the CAZ, such as minority ethnic and faith groups are more likely to live in more deprived neighbourhoods and the assessment also highlighted that older drivers could be impacted disproportionately. In both cases, digital exclusion due to lack of suitable devices or connectivity could be a barrier to accessing the funds, with alternative routes or more support made available to support those that need it.
- **Language and communication barriers:** Some of the impacted groups, such as minority ethnic and faith groups and also those with some disabilities may require additional support to access the information and application processes successfully.
- **Channels of communication:** Some of the protected characteristic groups impacted by the CAZ, particularly ethnic minority and faith groups may be more likely to trust local and informal, peer-to-peer channels of communication. It is important that these local networks are utilised as much as possible to encourage consideration and take-up of the available, mitigating measures.

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Question 12:

Have you set up equality monitoring systems to carry out regular checks on the effects your activity has on:

Equality Group		Details
Age	Yes	The GM CAP Monitoring and Evaluation Plan will form an annex to the Full Business Case for the GM CAP. Responsibility for monitoring the impacts on protected characteristic groups highlighted in this assessment, will sit within the Monitoring and Evaluation (M & E) Plan.
Disability	Yes	
Gender	Yes	
Gender Re-assignment	Yes	
Race	Yes	
Religion/Belief	Yes	
Sexual Orientation	Yes	
Maternity and Pregnancy	Yes	
Marriage and civil partnerships	N/a	

Question 13:

How will you measure the success of this activity? (including any corporate performance measures)

The success of the GM CAP will be measured through a programme of outcome and output measurement, which will be contained in the Monitoring and Evaluation Plan which will be appended to the Full Business Case.

The key measure of success will be through air quality monitoring, specifically compliance with the legal limit values for concentrations of NO2.

Question 14:

In question 10 above you may have outlined improvements to the activity which will mitigate a high, medium and/or low adverse impact(s). How will you ensure that everyone involved in the activity knows and understands what improvements you intend to make and is able to put the activity into practice with those improvements?

The outcome of the EqIA is being used to ensure that recommendations are embedded in the service design. In particular, in relation to reducing barriers for impacted groups to access the support that will be available, as detailed in Question 11.

Question 15:

Are there any elements within this activity that require a separate Equality Impact Analysis?

No

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Question 16:

Please confirm that during the implementation of this activity, where appropriate, TfGM's corporate strategies and procedures will be followed. If your answer to any of these questions is 'no' explain why you will not be following the strategy or procedure.

Strategy / Policy		Details
Communication with members of the public – TfGM's Corporate Communications Strategy will be followed	Yes	---
Consultation and Engagement – TfGM's Consultation and Engagement Strategy will be followed	Yes	---
Projects – Project Management Procedures will be followed	Yes	---

Question 17:

Is a Full Impact Analysis needed? If in question 8 you identified two or more adverse impacts you should either abort the activity, or carry out a full analysis

Yes, see section two. In addition, an Equality Impact Evidence Report (see Appendix) has also been produced and provides more evidence and detail to support this EqIA. The Equality Impact Evidence Report appends the ten individual equality assessments undertaken by the GM local authorities to assess potential local issues.

Question 18:

List all of the information that you have taken into account in carrying out this Equality Analysis.

1. Greater Manchester' Outline Business Case to tackle Nitrogen dioxide exceedances at roadside. Equality impact assessment, February 2019. Available at: https://assets.ctfassets.net/qwn52pjrjtij/p1rQ0jgmSHhnu2zTKKCNy/532bc6ad6b3474017ad6d609820e1f95/Equality_Impact_Assessment__EQIA_.pdf

2. https://www.greatermanchester-ca.gov.uk/media/4337/gmca_independent-inequalities-commission_v15.pdf

3. National data, sourced from Office for National Statistics Why have Black and South Asian people been hit hardest by Covid-19? (December 2020).

4. Public Health England – Air Quality in GM – from a Public Health Perspective (September 2018)

5. Defra – Clean Air Strategy 2018

6. The Clean Air Zone Framework (May 2017), Dept of Transport and DEFRA classifies Clean Air Zones as being either Class A, Class B or Class C. Class C includes buses, coaches, taxis, PHVs, HGVs and light goods vehicles (LGVs).

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7. Clean air zone framework. Principles for setting up clean air zones in England. May 2017. Department for Transport, Department for Food and Rural Affairs.

8. https://cleanairgm.com/clean-air-plans

9. Landrigan, P.J., et al (2018), The Lancet Commission on pollution and health. The Lancet 391:462-512

10. Great Manchester's Outline Business Case to tackle Nitrogen Dioxide Exceedances at the roadside – Analysis of distributional impacts, Aecom, February 2019.

11. Public Health England – Air Quality in Greater Manchester – from a Public Health Perspective (September 2018)

12. DEFRA, Air Pollution in the UK, 2017

13. DEFRA – Clean Air Strategy 2018 (2018)

14. Public Health England, Public Health Outcomes, http://www.phoutcomes.info/

15. NHS, Healthy Urban Development Unit (2013), HUDU Planning for Health- Rapid Health Impact Assessment Tool, http://www.healthyurbandevelopment.nhs.uk/wp-content/uploads/2013/12/HUDU-Rapid-HIA-Tool-Jan-2013-Final.pdf

16. Titheridge et al (2014) *Transport and Poverty – A Review of Evidence*, University College London

17. NatCen (2019). Transport and inequality: an evidence review for the Department of Transport

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Question 19:

Additional comments

None

Supporting documents

Equality Impact Evidence Report, supported by ten Appendices, one from each of the GM local authorities (See Appendix).

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Section 2: Full Equality Analysis

Part A

Question 1

Looking back at section one of the EQIA, in what areas are there concerns that the activity could have an adverse impact?

Equality Group	
Age	Adverse Impact
Disability	Adverse Impact
Gender	Adverse Impact
Race	Adverse Impact
Religion/Belief	Adverse Impact
Sexual Orientation	Adverse Impact
Other Gender Re-assignment Maternity / Pregnancy Marriage / Civil Partnership	 Adverse Impact No Adverse Impact No Adverse Impact

Question 2

Summarise the likely adverse impacts
The table below summarises the likely adverse impacts of the CAZ. The impact of the wider measures within the CAP programme in terms of mitigating these potential adverse impacts on affected protected characteristic groups is detailed in Question 7 of this document.

Equality Group	Details
Age	Older and younger people are more reliant on public transport as they are less likely to drive or own a vehicle. TfGM's travel diary survey (GM TRADs) years 6,7,8 (2017-2019) shows a higher proportion of bus users amongst people aged 19 and under compared to the GM average and GM TRADs years 678 also shows slightly higher than average proportion of bus users amongst people aged 60 and over. A retired person with no access to a car is over twice as likely than average to regularly use buses (GM Segmentation – Insights into bus use, Steer Davies Gleave, 2018). As such any changes to bus services or cost of bus services could impact the ability of these groups to access health and educational support or employment. Similarly, older people may be less able or confident to use public transport are more likely to use the services of local taxis. Again, a reduction in the number of taxis or an increase in fares could impact this group disproportionately. Statistics suggest that drivers of HGV, LGVs and Taxis are older: at a national level the average age of HGV drivers is 57 years with a GM Taxi Census in July 2020 indicating that 58% were over 45 and 25% over 55 years. Any impact on business costs or viability as a result of the CAZ could impact this group in terms of personal affordability. As drivers near retirement age, their ability or willingness to get credit to upgrade their vehicle could be reduced, further impacting on older drivers.
Disability	Car ownership tends to be low amongst particular equalities groups, such as those with disabilities and some long-term health conditions. This makes

	these groups disproportionately reliant upon public transport networks and taxis which, in their absence or where services are reduced, could lead to isolation and restricted access to social and economic activities that enhance life chances. Qualitative comments within the GM CAP consultation highlighted the reliance of some people with long term health and disabilities on vehicles that could be subject to the CAZ charge, and the impacts caused by loss of those services for these people. Access to reliable and regular bus, minibus, coach and taxi services is particularly in important in some communities across Greater Manchester, particularly where tram and trains do not service the local area and in the more rural neighbourhoods on the edge of the city region. Any change in services in these communities would have a greater impact on access for those with ill-health and / or disabilities. Some people with disabilities, or their families / carers, rely on adapted LGV / minibus vehicles to retain independence and / or access vital services.
Gender	Taxi drivers, PHV drivers and bus drivers are over 90% more likely to be male than female; 94% of bus drivers are male and womenintransport.com states that 92% of drivers in the industry are male. Any business cost increases are therefore likely to be disproportionately experienced by men. Over 96% of taxi drivers in England are male of which 81% are self-employed meaning that increases in costs will have a disproportionate impact in terms of both business and personal affordability on men, especially given increased vulnerability in this trade due to the economic impacts of Covid 19. For mothers with children or pregnant women, who do not own private cars, PHVs and hackneys can provide a more convenient alternative to public transport. Reduction in services or increases in fares would impact this group.
Race	Over 50 % of taxi drivers in England are from an ethnic minority, non-white background. Therefore, impacts in costs due to the implementation of the CAZ would have a disproportionate impact on ethnic minority groups in terms of business and personal affordability. People from ethnic minority backgrounds are statistically more likely to live in low-income households and be more reliant on public transport. Therefore, increased costs or reduction in services would affect them disproportionately.
Religion/Belief	The consultation highlighted a high proportion of the ethnic minority taxi drivers in GM were Muslims, indicating that adverse impacts to taxi drivers in terms of personal and / or business affordability will create a corresponding, disproportionate impact in terms of faith. There are other faith communities across GM that could also feel adverse impacts, including the Jewish community in Salford with an anecdotally high percentage of LGV use by local small businesses.
Sexual Orientation	There is anecdotal evidence to suggest that LGBTQ communities are more likely to access taxi services in order to safely access services and particularly the night- time economy in the city centre. This group could therefore be disproportionately impacted by changes in service or cost as a result of the CAZ.

Gender Re-assignment	There is anecdotal evidence to suggest that transgender individuals are more likely to access taxi services in order to safely access services and particularly the night-time economy in the city centre. This group could therefore be disproportionately impacted by changes in service or cost as a result of the CAZ.

Question 3

What relevant quantitative data has been collected or can be accessed to support this assessment e.g. research projects, monitoring data, documents you have read, statistical information broken down by diverse groups you have reviewed. (A bullet point list is suitable)

Please note that a full list of reference data sources and documents used to inform the GM CAP Equality Impact Evidence report is provided in the initial screening report within this EqIA. These are referenced and attributed fully in the Equality Impact Evidence Report that supports this EqIA (See Appendx 1).

Equality Group	Details
Age	**Sources 1:** A community baseline was undertaken across GM and the ten local authority areas in 2019 to inform the EqIA for Consultation. This was refreshed in 2021. Census data, ONS Index of Multiple Deprivation and statistics within Nomis were assessed and presented in the full Equality Impact Evidence report (See Appendx 1). **Sources 2:** TfGM's travel diary survey (GM TRADs) years 6,7,8 (2017-2019) **Source 3:** The AECOM Consultation Report and accompanying data provided some degree of quantitative data that, though not statistically representative, has been considered in this report **Source 4:** GM CAP Technical Notes and Deliberative Research reports
Disability	• Sources 1-3 as listed above. • **Source 5:** GM Independent Inequalities Commission report 2021
Gender	• Sources 1-4 as listed above
Race	• Sources 1-3 and 5 as listed above
Religion/Belief	• Sources 1 as listed above • The data from the GM CAP consultation allowed some degree of quantitative analysis by faith that, though not statistically representative could provide indicative evidence.
Sexual Orientation	• Sources 1 as listed above • No further quantitative data was available to support the assessment.
Gender Re-assignment	• Sources 1 as listed above • No further quantitative data was available to support the assessment.
Pregnancy and Maternity	• Sources 1 as listed above • No further quantitative data was available to support the assessment, but no adverse impacts were identified that were not covered under gender.

Question 4

What relevant qualitative data has been collected or can be accessed to support this assessment e.g. previous consultation or engagement, meetings attended where views of the members of the community, TfGM staff and/or staff from other agencies were given (A bullet point list is suitable)

As per the quantitative data referred to in Question 3, a full list of all supporting data sources is supplied in the Screening Section of this report.

Equality Group	Details
Age	**Source 1**: The AECOM GM CAP Consultation Report provided qualitative comments that have been considered in the GM Local Authorities Response to the Consultation report, the revised GM CAP Policy and this report **Sources 2:** GM CAP Technical Notes and Deliberative Research reports **Source 3**: GM Independent Inequalities Commission report 2021
Disability	• Sources 1 and 3 as listed above
Gender	• Sources 1-3 as listed above
Race	• Sources 1 and 3 as listed above
Religion/Belief	• Source 1 as listed above
Sexual Orientation	• Source 4: Anecdotal qualitative information was supplied during engagement with the Local Authority EqIA Working Group for the GM CAP in relation to this group, particularly from Equality and Policy leads from Manchester and Salford.
Gender Re-assignment	• Source 4 as listed above

Question 5

Give details of any gaps in information you became aware of during initial assessment e.g. lack of monitoring information by disability whereas it is available by race

Equality Group	Details
Age	Census data: For the demographic analysis undertaken for the GM-wide baseline and the local authority appendices, data from the 2011 Census has been used as the latest available Census data. It is recognised that this is a decade old and demographics across the city region have changed during this timeframe. This could have created inaccuracies and gaps in up to date information. 2021 Census data will be available in 2022 and should be reviewed for any changes in relation to protected characteristics.
Disability	Census data issue applies, as above
Gender	Census data issue applies, as above
Race	Census data issue applies, as above

Religion/Belief	Census data issue applies, as above
Sexual Orientation	Census data issue applies, as above Anecdotal qualitative information and local insight from experienced officers within the GM local authorities has been used to inform this assessment.
Gender Re-assignment	Gender identity is not covered within the 2011 Census data and so quantified information about this characteristic group at a GM and local level is limited. The 2021 Census addresses this and should be reviewed to give a more up to date picture, when available. Anecdotal qualitative information and local insight from experienced officers within the GM local authorities has been used to inform this assessment.

Question 6

Evaluate the proposed activity against all the information and evidence you have assembled and make reasonable judgment as to whether the policy is likely to have significant negative consequences for a particular diverse group.

If the evidence you have collected does not indicate whether or not there is likely to be any differential adverse impact, you should think about why this is the case and review the available information within the next 6-12 months. (You will need to outline this in the monitoring section later.

Has the assessment revealed any adverse impact?

Equality Group	
Age	Yes
Disability	Yes
Gender	Yes
Race	Yes
Religion/Belief	Yes
Sexual Orientation	Unable to tell – but anecdotal evidence suggests Yes
Gender Re-assignment	Unable to tell - but anecdotal evidence suggests Yes

If the information gathered suggests there is no differential adverse impact for any of the six equality strands you do not need to complete question 7.

Question 7

If the assessment shows that the proposed activity is likely to have an adverse impact on particular group(s) you should consider other ways of implementing the activity which reduces or eliminates the adverse effect, or which better promote equality of opportunity

Have any changes been made to this policy to remove or reduce the potential for adverse impact?

Equality Group	
Age	Yes
Disability	Yes
Gender	Yes
Race	Yes
Religion/Belief	Yes
Sexual Orientation	Yes
Gender Re-assignment	Yes

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The following table summarises how the proposed mitigations within the GM CAP Policy help to reduce the potential adverse impacts on protected characteristic groups.

Mitigation measure	Details of mitigation in particular relation to Equality considerations	Changes post consultation relevant to EqIA	Age	Disability	Pregnancy and maternity	Race	Religion	Sex	Gender Reassignment
Charge exemptions	Permanent exemptions are available that ensure continued access to transport options for those that need it and to fulfil the duty to make reasonable adjustments under section 20 Equality Act 2010. The following exemptions are ones that will impact on protected characteristics: • Community Minibuses – Those operating under a permit under section 19 or section 22 of the Transport Act (1985), issued by a body designated by the Secretary of State • Disabled passenger vehicles as classified by the DVLA tax class – vehicles (apart from ambulances) used by organisations providing transport for disabled people. • Disabled Tax Class vehicles - Vehicles used by, or for the purposes of a disabled person which are exempt from vehicle tax, as defined by the vehicle's DVLA Tax Class. • LGVs and minibuses adapted for a disabled user – with a substantial and permanent adaptation and not used for hire or reward	Addition to exemption of LGVs and Minibuses that are specifically adapted as Disabled User Vehicles	**x**	**x**				x	
	Temporary exemptions to 31st May 2023 are available for some vehicles. The following ones will impact on protected characteristics: • GM licensed Hackneys & PHVs • Coaches and buses not used on a registered bus service within GM. • LGVs licensed in GM • Minibuses (excluding Community Minibuses, which benefit from a permanent exemption). Temporary exemptions to July 2022 for buses operating on school bus contracts that expire that month.	Addition of temporary exemption of both Hackney and PHVs to recover from the financial effects of Covid-19. Clarification of temporary exemption period to be 12 months after commencement of the CAZ. Short term exemption of school buses where the contract is due to expire in July 2022 to	x	x		x	x	x	**x**

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Mitigation measure	Details of mitigation in particular relation to Equality considerations	Changes post consultation relevant to EqIA	Age	Disability	Pregnancy and maternity	Race	Religion	Sex	Gender Reassignment
		ensure continuity of service.							
Clean bus fund	The Clean Bus Fund aims to mitigate against potential financial impacts on bus service providers, that could result in a reduction in or increase in the cost of bus services caused by the charging. This should help maintain the supply and affordability of these services. • Open to all registered operators with registered bus services operating in GM • It will be available ahead of the CAZ to ensure that service providers can avoid charges and can plan for impact to their business. • Level of funding requested has increased since OBC – indicating greater emphasis on mitigating this impact. • A grant of up to £16,000 is available to retrofit or replace a non-compliant vehicle	No change	x	x			x	x	
Clean Commercial Vehicle Fund	The Clean Commercial Vehicle Fund will offer businesses financial support in the form of a lump sum grant OR access to affordable finance to replace or retrofit non-compliant vehicles, reducing the impact of possible charges on their service provision. Eligible businesses include: • An entity registered with the Charity Commission (including being an active charity and those excepted from registration) • A social enterprise This financial support includes support to retrofit or replace coaches and minibuses (not on a registered bus service) which should help to maintain the supply and affordability of community transport. Funding is targeted to support eligible small and micro businesses, sole traders, self-employed, charities, social enterprises and individuals in GM. Following consultation, the funding level has been increased.	Proposed increases in funds for replacement of some vehicles to reflect the market, funding gap between residual value of existing vehicle and a replacement cost and economic impacts of the Covid-19 pandemic on the market. Inclusion of retrofit grants, in addition to replacement grants for LGVs and minibus to reflect changing availability of these options.	x	x				x	

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Mitigation measure	Details of mitigation in particular relation to Equality considerations	Changes post consultation relevant to EqIA	Age	Disability	Pregnancy and maternity	Race	Religion	Sex	Gender Reassignment
Clean Taxi Fund	The Clean Taxi Fund will provide funding towards the retrofit of vehicles to meet the GM CAZ emission standards, towards the replacement of non-compliant vehicles with compliant vehicles or towards running costs when the compliant vehicle acquired with GM CAP funds has also been eligible for a Government plug-in grant	Inclusion of non-WAV Hackneys in funding eligibility Increase in maximum grant fund levels for most Hackney and PHV vehicle types The funds do not distinguish between Hackney and PHV vehicles, providing parity across the trade.	x	x		x	x	x	x
Taxi Specific Electric Vehicle Infrastructure	The provision of 40 rapid electric vehicle charging points across GM, to be used specifically by hackneys and PHVs.	No Change	x	x		x	x	x	

The potential residual, adverse impacts of the GM CAP on protected characteristic groups after these mitigation measures are put in place can be summarised as:

Degree of adverse impact with implementation of mitigating measures	Affordability	Accessibility
Medium adverse impact	Sex (male drivers)	-
Low adverse impact	Race Religion Disability Age (young and older people)	Race Disability Age (young and older people) Gender Reassignment Sexual Orientation

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Question 8

What consultation or engagement will take place with equality target groups? Give details.

Consultation took place between 8 October and 3 December 2020[13]. A total of 4, 768 responses were received to the consultation from across and outside of GM. Members of the public made up 3,858 of the responses.

Part B

Complete this section when consultation and research has been carried out

Question 9

Please summarise in the table below which groups or organisations were consulted with or included in the research. You should briefly record the outcomes of the consultation or research and state whether the results have been fed back to consultees.

Summarise who was consulted/involved in the research (internal and external) and what the nature of the work was	What were the outcomes of the consultation? (Summarise their views including any changes they proposed)	Have the results been fed back to the consultees?
A full consultation report has been prepared by AECOM and will be published in July (subject to local authority approval). The full report is available at https://cleanairgm.com/technical-documents/ and describes the nature of the consultation, who responded to the consultation and the feedback received. The GM response to the consultation findings are detailed in the GM Local Authorities Response to the Consultation report, available at https://cleanairgm.com/technical-documents/. Equality impacts have been considered throughout the development of these reports, and the corresponding changes to the GM CAP Policy. The Equality subject matter expert from the GM CAP lead advisor team reviewed all the responses to issues raised within the consultation and assessed any changes to the GM CAP Policy from an equality perspective. This resulted in the Equality Impact Evidence Report which informs this EqIA (See Appendx 1).		In progress – the AECOM GM CAP Consultation Report and an accompanying GM Local Authorities Response to the Consultation report will be published as part of Local Authority decision making.

Question 10

As a result of this assessment and the available evidence collected, including consultation, state what changes are proposed to your activity.

The changes to the GM CAP policy proposed since consultation that are relevant to protected characteristic groups are detailed in Question 7 above. Equality and socio-economic impacts have been considered throughout the development of the proposals and the changes should significantly mitigate any adverse affordability and accessibility impacts on protected characteristic groups highlighted in this report.

Question 11

Decide whether to progress the activity. If potential adverse impacts have been identified upon any equality target groups and still remain, please provide justification for its implementation.

[13] https://cleanairgm.com/clean-air-plans

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Adopt.

Adopt

As described in this assessment, GM has been directed by the Government to introduce a CAZ C and associated measures across the region with the overall aim to reduce harmful Nitrogen Dioxide (NO2) to within legal limit values in the "shortest possible time". There will be significant positive health benefits as a result of the CAZ for **the whole GM population, including people with protected characteristics**. Those who are younger, older, with a disability or long-term health condition, pregnant and / or from minority ethnic groups are likely to feel this benefit disproportionately.

In addition, significant measures have been put in place to mitigate the potential residual adverse impacts that could result from the GM CAP on some of the protected characteristic groups. These are summarised below. The Equality impact assessment process has assessed the GM CAP in relation to indirect discrimination[14] under the Equality Act definition in section 19 on these groups.

Degree of adverse impact with implementation of mitigating measures	Protected characteristic	Mitigations and assessment of indirect discrimination
Medium adverse impact	Sex (male drivers)	All males in GM will benefit from the cleaner air resulting from the implementation of the CAZ. The mitigations disproportionately support males, as the % of drivers / owners of vehicles in scope for the GM CAZ charge that are male is significantly greater than 50%. The changes to mitigating measures post-consultation are significant, offering temporary exemptions to more vehicle types and increases to funds to reflect market conditions. It is important that those impacted by the CAZ charges have good understanding of and accessibility to the support available through the Funds and are fully aware of the wider package of exemptions and discounts available. On the basis that this is in place, it is concluded that there is no indirect discrimination in relation to males.
Low adverse impact	Race	Improvements in air quality are likely to have a disproportionate benefit on more deprived neighbourhoods in GM. People of minority ethnic background are more likely to live in these areas of GM and are disproportionately more likely to experience benefits from improved air quality. The potential low adverse impact of the CAZ in relation to race, related to personal and business affordability, particularly in relation to PHV and Hackney drivers. The introduction of the temporary exemption across both hackney carriages and PHV post-consultation, as well as the Clean Taxi

[14] where a provision criteria or practice puts a person with a protected characteristic at a particular disadvantage compared with a person that does not share that same characteristic and it cannot be shown to be a proportionate means of achieving a legitimate aim

		Fund and access to vehicle finance all support the mitigation of this potential risk. The revised CAP policy does not distinguish between hackney carriages and PHV in terms of mitigations available, with the funding levels based on whether a vehicle is a Wheelchair Accessible Vehicle (WAV) or not. It is important that those impacted by the CAZ charges have good understanding of and accessibility to the support available through the Funds and are fully aware of the wider package of exemptions and discounts available. On this basis, it is concluded that there is no indirect discrimination in relation to race.
	Religion	Improvements in air quality are likely to have a disproportionate benefit on more deprived neighbourhoods in GM. People of minority faiths are more likely to live in these areas of GM and are disproportionately more likely to experience benefits from improved air quality. The potential low adverse impact of the CAZ in relation to religion / belief related to personal and business affordability, particularly in relation to PHV and Hackney drivers of Muslim faith and LGV drivers, including Jewish drivers of LGVs in Salford. The temporary exemption, as well as the Clean Taxi and Commercial Vehicle Funds and access to vehicle finance all support the mitigation of this potential risk. It is important that those impacted by the CAZ charges have good understanding of and accessibility to the support available through the Funds and are fully aware of the wider package of exemptions and discounts available. On this basis, it is concluded that there is no indirect discrimination in relation to religion.
	Disability	People with certain disabilities or long-term health conditions will benefit disproportionately from improved air quality. However, due to higher reliance on community transport, PHV / Hackney carriages and public transport, there is a low level of residual risk in relation to accessibility to places of education, employment, health support, social activities and worship. Significant measures have been put in place, such as funding, exemptions and discounts that should mitigate the risk that a change in availability of transport services will happen as a result of the GM CAZ that leads to accessibility or cost issues for those with disabilities or health conditions. In addition, higher levels of funding for WAV PHVs and Hackney Carriages have been put in place, as well as permanent

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		exemptions for Disabled passenger vehicles as classified by the DVLA tax class, Disabled Tax Class vehicles and LGVs and minibuses adapted for a disabled user to help to mitigate any accessibility or cost impact. As a result, it is concluded that there is no indirect discrimination in relation to people with disability.
	Age	Older and younger people will benefit disproportionately from improved air quality. However, due to higher reliance on public transport, community transport and PHV / Hackney carriages, there is a low level of residual risk in relation to accessibility to places of education, employment, health support, social activities and worship. Significant measures have been put in place, such as funding, exemptions and discounts that should mitigate the risk that a change in availability of transport services leads to accessibility issues for older or younger people. There is a potential low adverse impact of the CAZ in relation to older people related to personal and business affordability, particularly for older people with non-compliant vehicles for whom upgrade does not seem a viable option. The Clean Funds mitigates this risk, with options for both retrofit and replacement for many vehicle types. As a result, it is concluded that there is no indirect discrimination in relation to younger or older people.
	Sexual Orientation	People of all sexual orientations will benefit from the air quality improvements that will result of the GM CAZ. However, there is anecdotal evidence to suggest that LGBTQ communities are more likely to access taxi services in order to safely access services and particularly the night- time economy in the city centre. This group could therefore be disproportionately impacted by changes in service or cost as a result of the CAZ. Significant measures have been put in place, such as funding, exemptions and discounts that should mitigate the risk that a change in availability of transport services will happen as a result of the GM CAZ that leads to accessibility or cost issues for the LGBTQ community. As a result, it is concluded that there is no indirect discrimination in relation to this group.
	Gender Reassign-ment	However, there is anecdotal evidence to suggest that transgender communities are more likely to access taxi services in order to safely access services and particularly the

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		night- time economy in the city centre. This group could therefore be disproportionately impacted by changes in service or cost as a result of the CAZ. Significant measures have been put in place, such as funding, exemptions and discounts that should mitigate the risk that a change in availability of transport services will happen as a result of the GM CAZ that leads to accessibility or cost issues for the transgender community. As a result, it is concluded that there is no indirect discrimination in relation to this group.

The response to Question 11 in Section 1 of this report highlights mitigations that should be considered to further address the residual adverse impacts namely, increasing the accessibility of vulnerable groups to the Funding, Exemptions and Discounts.

In addition, Question 13 below details the proposed approach to monitoring of the potential equality impacts, both positive and negative. It is important that a rigorous approach to this is adopted to ensure that any unintended impacts on protected characteristics are picked up early and so that interventions can be quickly put in place to minimise these. With the removal of the Hardship Fund from the package of measures and the fact that most of the GM local authorities include socio-economic deprivation / low income as a characteristic within their equality impact assessments, monitoring of the impact of the CAZ on economically vulnerable individuals and businesses will be particularly important. Involvement of the ten local authorities in this, to pick up local intelligence and insights will be key.

On this basis, it is recommended that the GM CAP Policy is adopted.

Question 12

Will the changes planned ensure that adverse impact is:

Legal? (Not discriminatory, under anti-discriminatory legislation)	Yes
Intended?	Yes
Low impact?	Yes

Question 13

How will this activity be monitored and evaluated after full implementation? Give details

A GM CAP Monitoring and Evaluation Plan will form an annex to the Full Business Case for the GM CAP. Responsibility for monitoring the impacts on protected characteristic groups highlighted in this assessment, will sit within the Monitoring and Evaluation (M & E) Plan.

The ten local authority local authority EqIA provide further detail on any specific monitoring and review processes that will be put in place to monitor the equality impacts of the GM CAP at a local level.

Question 14

Publishing the summary of the results of the EQIA helps TfGM to share information with members of the public and other stakeholders. Is there any reason why this Impact Assessment cannot be published? If so, please explain why?

No

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Process signed off by	Megan Black
Date completed	June 21

Validator's comments	
Validated by	Donna Cooper
Date validated	June 21
Next review date	

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Greater Manchester's Clean Air Plan to Tackle Nitrogen Dioxide Exceedances at the Roadside

Appendix 2 – GM CAP EQIA following Consultation – Evidence report

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Warning: Printed copies of this document are uncontrolled

Version Status:	Draft for approval	**Prepared by:**	Transport for Greater Manchester on behalf of the 10 Local Authorities of Greater Manchester
Date:	20 June 2021		

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1 Introduction

1.1 Why GM is producing a Clean Air Plan

1.2 Poor air quality is the largest environmental risk to the public's health. Taking action to improve air quality is crucial to improve population health.

1.3 Whilst air quality has been generally improving over time, particular pollutants remain a serious concern in many urban areas. These include oxides of nitrogen (NO_x) and in particular nitrogen dioxide (NO_2), and particulate matter (PM).

1.4 In Greater Manchester, road transport is responsible for approximately 80% of NO_2 concentrations at roadside, of which diesel vehicles are the largest source.

1.5 Long-term exposure to elevated levels of particulate matter ($PM_{2.5}$, PM_{10}) and NO_2 may contribute to the development of cardiovascular or respiratory disease and may reduce life expectancy. The youngest, the oldest, those living in areas of deprivation, and those with existing respiratory or cardiovascular disease are most likely to develop symptoms due to exposure to air pollution.

1.6 Public Health England estimate the health and social care costs across England due to exposure to air pollution will be £5.3 billion by 2035 for diseases where there is a strong association with air pollution, or £18.6 billion for all diseases with evidence of an association with air pollution.

1.7 The Secretary of State for Defra has instructed many local authorities across the UK, including authorities in Greater Manchester, to take quick action to reduce harmful Nitrogen Dioxide (NO_2) levels, issuing a direction under the Environment Act 1995 to undertake feasibility studies to identify measures for reducing NO_2 concentrations to within legal limit values in the "shortest possible time". In Greater Manchester GM have worked together to develop a Clean Air Plan to tackle NO_2 Exceedances at the Roadside, referred to as GM CAP.

1.8 The core goal of the GM CAP is to address the legal requirement to achieve compliance with the legal Limit Value (40 $\mu g/m^3$) for NO_2 identified through the target determination process in Greater Manchester in the "shortest possible time" in line with Government guidance.

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1.9 This is a GM Equality Impact Evidence report which looks at the potential for the GM CAP to result in disproportionate or differential equality effects because of the proposed policies. It provides a full Equality Impact Assessment (EqIA) in line with the public sector equality duty in section 149 of the Equality Act, 2010, and the evidence and findings of this report have been fed into a summary EqIA in TfGM format.

1.10 This assessment builds on the EqIAs that have been published at the Outline Business Case stage in March 2019 and the EqIA developed to support the consultation in late 2020. It considers impacts related to the CAZ and how implementation of mitigation measures through the wider CAP measures addresses any identified equality impacts. This EqIA is an update following changes to the GM CAP policy made in consideration of feedback received during the consultation.

1.11 This assessment is informed by two further documents: an updated Distributional Impact Analysis (DIA) for the Interim Full Business Case (FBC) and a GM CAP Health Impact Evidence Report that summarises current, relevant health research and literature around exposure to NO_2 pollution.

1.12 The main assessment is made at the scale of Greater Manchester. Following earlier drafts of the GM EqIA at OBC and ahead of consultation, each of the ten Greater Manchester authorities has also carried out their own assessment, utilising more granular data, specific to each individual local authority. Whilst this GM wide report does set out the community baseline, broken down by local authority, it is recognised that these data are from central sources and local authorities hold data and insight that may be more recent and/or specific to their own communities. Each of the local authority assessments are appended to this document and significant findings and variances are summarised within this document.

1.13 An EqIA is a process that can be used to inform the development of policies in order to facilitate maximum positive outcomes and to avoid or minimise adverse impacts on protected characteristic groups. The aim of the assessment is therefore to bring consideration of equality into the heart of policy development, contributing to better equality outcomes, promoting greater equality of opportunity and assisting in improving quality of life for residents and communities.

1.14 Under Section 149 of the Equality Act (2010), public bodies are subject to the Public Sector Equality Duty, which requires that, in the exercise of their functions, they have due regard to the need to:

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a) Eliminate discrimination, harassment, victimisation, and any other conduct that is prohibited by or under the Act;

b) Advance equality of opportunity between persons who share a protected characteristic and persons who do not share it; and

c) Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

1.15 Therefore, the aim of the EqIA is to identify whether people with protected characteristics could be affected by the GM CAP disproportionately or differentially:

- Disproportionate effects arise when an impact has a proportionately greater effect on people with protected characteristics than the rest of the population.
- Differential effects arise where people with protected characteristics could be affected differently from the rest of the population, due to a particular need or sensitivity.

1.16 The Equality Act identifies the following as “protected characteristics” which should be considered in an EqIA:

- age;
- disability;
- gender reassignment;
- marriage and civil partnership;
- pregnancy and maternity;
- race;
- religion or belief;
- sex; and
- sexual orientation.

1.17 These protected characteristics can be broken down into further groups which may assist in identifying where effects may occur (see Table 1). Consideration is given to all of these subgroups when assessing potential impacts on each of the protected characteristics.

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Table 1 Protected characteristic groups considered in the EqIA

Protected characteristic	Further subcategories within protected characteristic groups for consideration within the assessment
Age	Children and young people (under 19)
	Older people (aged 60+)
Disability	People with physical impairments (Includes mobility, co-ordination, lifting and carrying, manual dexterity, wheelchair user)
	People with communication or sensory impairments (Includes blind/partially sighted, deaf/hard or hearing, difficulty speaking)
	People with a learning disability or cognitive impairment (Includes conditions which affect ability to learn, understand, read, remember, and concentrate e.g. Downs Syndrome, autism, ADA)
	People with mental health problems (Includes depression, schizophrenia)
	People with long standing illness/health condition (Includes cancer, HIV, MS, diabetes, heart disease, epilepsy, continence)
	Other disability/impairment not covered by any of the above
Gender reassignment	Transgender
Marriage and civil partnership	No further sub-categories
Pregnancy and maternity	No Further sub-categories
Race	Asian or Asian British Backgrounds (This includes Pakistani, Indians and Bangladeshi, Chinese or any other Asian background)
	Black or Black British Backgrounds (This includes Caribbean, African or any other black background)
	Mixed /Multiple Ethnic Groups (This includes White and Black Caribbean, White and Black African, White and Asian or any other mixed background)
	White British Background (This includes English, Scottish & Welsh, Irish and Gypsy or Irish Travellers)
	Non-British White Backgrounds (This includes Irish, Polish, Spanish, Romanians and other White backgrounds)
	Arabs
	Any other background not covered by any of the above
Religion or belief	Buddhists
	Christians

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Protected characteristic	Further subcategories within protected characteristic groups for consideration within the assessment
	Hindus
	Jews
	Muslims
	Sikhs
	Others
Sex	Men
	Women
Sexual orientation	Gay men
	Lesbians
	Bisexual

1.18 This EqIA applies to the Greater Manchester city region. The assessment considers the baseline conditions of the ten districts that make up the GM area:

- Bolton
- Bury
- Manchester
- Oldham
- Rochdale
- Salford
- Stockport
- Tameside
- Trafford
- Wigan

1.19 These local authority areas are represented below:

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Figure 1 GM Local Authorities



1.20 The separate EqIAs for each GM local authority are included in Appendix E - N.

1.21 This report covers outputs associated with implementation of the GM CAP measures. The assessment undertaken represents a snapshot of the information available at the time of writing; however, this EqIA is a live document and should be read accordingly. It is recommended that an update is made following any future changes to any of the measures.

1.22 The COVID-19 pandemic has unquestionably highlighted areas of inequality within our society, with those who are already the most vulnerable to health and economic shocks having been most affected. The added economic strain caused by the pandemic on those who are already economically disadvantaged or more vulnerable means that further economic pressures are likely to be experienced more acutely by these individuals, communities and businesses.

1.23 The COVID-19 pandemic has impacted on the timescales for implementing the CAZ, resulting in the implementation of the CAZ being delayed from 2021 to 2022.

1.24 Market analysis has been undertaken on the impact of the COVID-19 pandemic on businesses and individuals affected by the CAZ, and the statutory consultation in late 2020 (see section 2.6) explored the issue further. A report summarising the impact of COVID-19 on the GM CAP has been developed[1]. The findings have been considered, the CAP measures refined and fed into the current GM CAP Policy which is the basis of this EqIA.

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[1] https://cleanairgm.com/technical-documents/

1.25 In assessing the equality impacts of the GM CAP, the impacts of COVID-19 are acknowledged as likely to make some protected characteristic groups more vulnerable to the potential unintended consequences of the CAZ. The GM Independent Inequalities Commission report[2], published in March 2021, highlights the disproportionate impact of COVID-19 on communities with protected characteristics including "Workers from 'Other White' ethnic groups were more likely to have lost take-home pay than White British or people of Indian heritage; people from Pakistani, Bangladeshi, Chinese or Other Asian ethnicities were more likely than White British people to worry about their future financial situation[3]".

1.26 The approach that has been followed includes:

- **Establishment of baseline** – social and demographic data relevant to GM is identified in order to determine the proportion of people within GM who share protected characteristics.
- **Identification of equality impact indicators** – establishment of which indicators would be helpful for analysing the equality impacts from the CAP;
- **Assessment of impact** – based around the equality impact indicators, potential equality impacts resulting from the GM CAZ are identified. Determination of whether these would have a disproportionate or differential impact on protected characteristic groups is based on a review of the evidence.
- **Review of CAP mitigation measures** – the additional mitigating measures that make up the GM CAP are then assessed against the chosen equality impact indicators to identify the potential change in impact that they bring to the programme.

1.27 The professional judgements made in this assessment are based on the information available at the time of undertaking. People are, of course, more than the sum of their characteristics and it is acknowledged that there is significant diversity within, as well as between, the protected characteristics considered in this EqIA. Individuals may also have multiple protected characteristics which may interact to change the services and places that they need and want to access.

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[2] https://www.greatermanchester-ca.gov.uk/media/4337/gmca_independent-inequalities-commission v15.pdf
[3] National data, sourced from Office for National Statistics Why have Black and South Asian people been hit hardest by COVID-19? (December 2020).

1.28 Nevertheless, there are ways in which broad groups of people with protected characteristics could potentially be systematically disadvantaged and this process attempts to ensure that as far as possible that the GM CAP does not do so.

2 Greater Manchester Clean Air Plan

2.1 The objectives of the GM CAP

2.2 The core goal of the GM CAP is to address the legal requirement to achieve compliance with the legal Limit Value (40 µg/m^3) for NO_2 identified through the target determination process in Greater Manchester in the "shortest possible time" in line with Government guidance.

2.3 Legal requirement

2.3.1 The Secretary of State for Defra has instructed many local authorities across the UK, including authorities in Greater Manchester, to take quick action to reduce harmful Nitrogen Dioxide (NO_2) levels, issuing a direction under the Environment Act 1995 to undertake feasibility studies to identify measures for reducing NO_2 concentrations to within legal limit values in the "shortest possible time". In Greater Manchester GM have worked together to develop a Clean Air Plan to tackle NO_2 Exceedances at the Roadside, referred to as GM CAP.

2.4 Public health

2.4.1 Poor air quality is the largest environmental risk to the public's health. Taking action to improve air quality is crucial to improve population health.

2.4.2 Long-term exposure to elevated levels of particulate matter (PM2.5, PM10) and NO2 may contribute to the development of cardiovascular or respiratory disease and may reduce life expectancy [4]. The youngest, the oldest, those living in areas of deprivation, and those with existing respiratory or cardiovascular disease are most likely to develop symptoms due to exposure to air pollution [5,6] .

2.4.3 Public Health England estimate the health and social care costs across England due to exposure to air pollution will be £5.3 billion by 2035 for diseases where there is a strong association with air

[4] Air Quality – A Briefing for Directors of Public Health (2017), https://www.local.gov.uk/air-quality-briefing-directors-public-health
[5] Air Quality – A Briefing for Directors of Public Health (2017), https://www.local.gov.uk/air-quality-briefing-directors-public-health
[6] RCP and RCPCH London, Every breath we take lifelong impact of air pollution (2016), https://www.rcplondon.ac.uk/projects/outputs/every-breath-we-take-lifelong-impact-air-pollution

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pollution, or £18.6 billion for all diseases with evidence of an association with air pollution [7].

2.5 Funding

2.5.1 The Government has set up an Implementation Fund to support Local Authorities to prepare their Clean Air Plans (CAPs) and deliver targeted action to improve air quality by tackling roadside NO2 levels to achieve compliance with legal limit values. Local Authorities have been encouraged to consider a wide range of innovative options so that they can deliver reduced emissions in a way that best suits their communities and local businesses. The overall spending objective of the CAP measures that are funded via the Implementation Fund is to deliver a scheme that leads to compliance with NO_2 limit values in the shortest possible time.

2.5.2 The Government has also made funding available for Local Authorities through a Clean Air Fund (CAF). The aim of the CAF is to minimise the impact of local Clean Air Plans on individuals and businesses, enabling Local Authorities to implement Clean Air Plans that impact negatively on fewer people, by supporting those who are subject to the charge to switch to compliant modes of transport. The CAF guidance states that applications should form part of the business case and that if successful, funds will be awarded at the same time as plans are approved by the Government. The overall spending objective of the CAP measures that are funded via the CAF is to support individuals and businesses negatively affected by a local plan for tackling nitrogen dioxide emissions at the roadside.

2.6 Main measures within the GM CAP

2.6.1 The GM CAP proposes a charging Class C CAZ[8], with additional measures to tackle nitrogen dioxide exceedances (see Figure 3 below). Additional measures include funds and finance to support the retrofit and/or replacement of buses, taxis and commercial vehicles which do not meet the emissions standards required by the CAZ. The proposals do not impact on the use of private cars.

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[7] https://www.gov.uk/Government/news/new-tool-calculates-nhs-and-social-care-costs-of-air-pollution

[8] The Clean Air Zone Framework (May 2017), Dept of Transport and DEFRA classifies Clean Air Zones as being either Class A, Class B or Class C. Class C includes buses, coaches, taxis, PHVs, HGVs and light goods vehicles (LGVs).

2.6.2 Six mitigating measures were proposed as part of the preferred option at OBC, in order to reduce the unintended adverse impacts of the CAZ C charging zone. These were developed further and included in the GM CAP Policy for Consultation. Alongside a charging CAZ category C, the package proposed support to help owners or registered keepers of non-compliant buses, coaches, HGVs, LGVs, taxis and minibuses with the cost of upgrading or retrofitting their vehicles, as well as a Try Before You Buy scheme for Zero Emission Capable (ZEC) hackney carriages and a network of 40 taxi-only rapid electric vehicle charging points.

2.6.3 Following review of the consultation responses, the GM CAP Policy has been updated and the impact of the revised measures is assessed in section 3.3 of this report.

2.7 Clean Air Zone

2.7.1 This CAZ policy sets out the basic principles of the charging zone. It considers the boundary of the CAZ, categories of vehicles subject to charges, emissions standards required of compliant vehicles, the charge levels, charging and enforcement, and the discounts and exemptions from the CAZ charge. It outlines that Heavy Goods Vehicles (HGVs), Light Goods Vehicles (LGVs), buses, coaches, minibuses and taxi & Private Hire Vehicles (PHVs) are subject to pay a daily charge to enter, exit, or move within the zone unless they meet the government specified Clean Air Zone framework[9].

2.7.2 Under the proposals, there will be several permanent local exemptions, including emergency service vehicles, community minibuses, disabled passenger vehicles and driving within the zone as result of a road diversion. There are also national exemptions as set out in the Government's Clean Air Zone Framework, and a number of temporary local exemptions and discounts.

2.8 Funding to upgrade to compliant vehicles

2.8.1 A package of funding support is proposed to help owners or registered keepers of non-compliant vehicles with the cost of up-grading their vehicles so that they are compliant with the emissions standards required by a GM CAZ, and so as not to be subject to the charge. The different funding proposals are set out below. All the funds are subject to specific eligibility criteria that must be met by the applicant.

[9] Clean air zone framework. Principles for setting up clean air zones in England. May 2017. Department for Transport, Department for Food and Rural Affairs.

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2.9 Clean Bus Fund

2.9.1 This measure will provide financial support in the form of a grant for the retrofit or replacement of vehicles operating registered local bus services in Greater Manchester. The Clean Bus Fund will also consider coaches and minibuses operating registered bus services within GM, though this fund is not proposed for minibuses used as private hire vehicles or commercial coaches. (See separate measures outlined below for these vehicle types).

2.10 Clean Commercial Vehicle Fund

2.10.1 This measure proposes to provide financial support in the form of grants to support the replacement or retrofit of non-compliant light and heavy goods vehicles, coaches, buses and minibuses, not used on a GM registered bus service, to upgrade to a vehicle compliant with the emissions standards of the CAZ. The fund is subject to eligibility criteria that must be met by the applicant and is targeted to support smaller businesses, including microbusinesses and sole traders, and the voluntary, community and social enterprise sector registered within Greater Manchester.

2.11 Clean Taxi Fund

2.11.1 This measure proposes to provide financial support in the form of a grant for the replacement or retrofit of Greater Manchester licensed taxi & PHV to upgrade to a vehicle compliant with the emission standards of the CAZ. This aims to mitigate the adverse impacts of the GM CAP on drivers and/or operators of Greater Manchester licensed taxi & PHV's.

2.12 Vehicle finance

2.12.1 In response to feedback in the Clean Air Conversation in 2019 and the consultation in 2020, GM has developed a Vehicle Finance measure designed to provide access to affordable finance to eligible applicants and address some of the potential reasons that finance might be refused to them, including affordability of repayments or a thin credit file that impacts their credit score.

2.12.2 Those for whom the CAZ charge is applicable may apply for Vehicle Finance, subject to the criteria set out within the policy; lending will be subject to status.

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2.13 Taxi Electric Vehicle Infrastructure

2.13.1 A network of 40 taxi-only rapid electric vehicle charging points is proposed, tailored to locations that support Zero Emission Capable (ZEC) taxis to operate across GM. The aim of this measure is to help reduce the barriers to transition to electric hackney vehicles.

2.14 CAZ implementation phasing

2.14.1 The anticipated implementation date of the charging CAZ is 31st May 2022[10] when the charges will apply to non-compliant buses, HGVs, and Hackney Carriages and private hire vehicles licensed outside of Greater Manchester. Non-compliant LGVs, minibuses and coaches, and GM-licensed Hackney Carriages and private hire vehicles would be subject to the charges from 1 June 2023 when a temporary exemption expires. The funds and vehicle finance measures will be available in 2021, in advance of the CAZ becoming operational, to enable businesses and individuals impacted by the charges to prepare in advance.

2.15 Who is affected by the GM CAP?

2.15.1 The main objective of the GM CAP is to achieve compliance with the legal limit values for NO_2 concentrations in the shortest possible time, in line with legislation and government guidance. Therefore, as a result of improved air quality, everyone who lives, works and travels within (and through) Greater Manchester will benefit from implementation of the GM CAP. Those who own non-compliant vehicles and/or travel within (and through) Greater Manchester are also likely to be affected by the implementation of the GM CAP for reasons of accessibility and affordability. These effects are considered in more detail within this report.

2.16 Consultation

2.16.1 A programme of research, analysis, public and stakeholder engagement has taken place since the OBC. This has provided more information to identify the potential impact of the proposals on those affected by the CAZ including low income workers; key business sectors such as retail and leisure, transport and distribution; and on small local businesses.

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[10] subject to joint GM and JAQU agreement on overall 'readiness', including that the Central Charging Portal and national Vehicle Checker is GM ready.

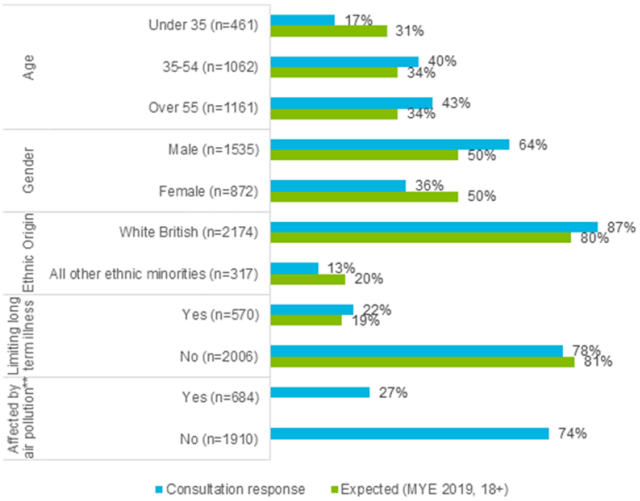
2.16.2 Initially, a public 'conversation' on the outline proposals ran from 13 May 2019 to 30 June 2019, seeking wide-ranging feedback from the general public, businesses and stakeholders on the options for achieving compliant NO_2 levels in Greater Manchester. Around 3,300 responses were received over the seven-week period, including responses from umbrella groups representing more than 50,000 members. Around 70% of the responses were residents of Greater Manchester and 16% were businesses in Greater Manchester. These results, along with outputs from wider stakeholder engagement with a range of groups, were used to inform the development of more detailed proposals.

2.16.3 As required by the Transport Act 2000, a statutory consultation on these detailed proposals, including the proposed charging CAZ, was undertaken between 8 October and 3 December 2020[11]. A total of 4,768 responses were received to the consultation from across and outside of GM. Members of the public made up 3,858 of the responses: the profile of respondees is illustrated in Figure 3 below.

2.16.4 441 responses were also received from businesses, with a further 343 from taxi or PHV drivers or operators and 124 from representatives. Additional in-depth interviews, including with taxis and PHV drivers and focus groups were carried out.

2.16.5 The feedback from the consultation has been considered and has informed changes to the CAP measures that are reflected in GM CAP Policy being assessed in this EqIA. More detail can be found in the GM Authorities Response to the Consultation report[12].

Figure 3: demographic profile for members of the public responding to consultation (%)



[11] https://cleanairgm.com/technical-documents/
[12] https://cleanairgm.com/technical-documents/

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3 EqIA screening

3.1 Screening of impacts

3.1.1 Equality effects of the GM CAP were initially screened at the development of the OBC, in order to highlight which protected characteristic groups would likely be affected by the GM CAP, and how they would be affected. The results of the screening are presented in Table 2 below and are based on the initial EqIA that was published with the OBC in March 2019.

Table 2 Summary of initial equalities screening at Outline Business Case (March 2019)

Protected characteristic	Likely to be disproportionately affected	Likely to be differentially affected	Comment <u>at OBC stage</u>
Age	✓	✓	The most vulnerable are more likely to be affected by changes to air quality including the young and elderly. Young and older people are more likely to be reliant on public transport (including taxis, PHVs and community transport) and therefore any changes in availability, cost and frequency of services would affect them.
Disability (includes all forms of physical and mental disability)	✓	✓	Disabled people are more likely to be reliant on public transport (including taxis, PHVs and community transport) and therefore any changes in availability, cost and frequency of services would affect them
Gender reassignment	**X**	**x**	At OBC, it was felt that there was no evidence to suggest that there would be any inequalities effects
Marriage and civil partnership	**X**	**x**	There is no evidence to suggest that there would be any equalities effects
Pregnancy and maternity	**X**	✓	Extremely low-dose exposures to pollutants during windows of vulnerability in utero and in early infancy may result in health effects throughout their lifespan[13].
Race	✓	**x**	People of minority ethnic background are more likely to live in areas with existing poor air quality. They are disproportionately more likely to experience benefits from improved air quality.

[13] Landrigan, P.J., et al (2018), The Lancet Commission on pollution and health. The Lancet 391:462-512

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Protected characteristic	Likely to be disproportionately affected	Likely to be differentially affected	Comment at OBC stage
Religion or belief	**X**	**x**	At OBC, it was felt that there was no evidence to suggest that there would be any equalities effects.
Sex	**X**	**x**	At OBC, it was felt that there was no evidence to suggest that there would be any equalities effects.
Sexual orientation	**X**	**x**	At OBC, it was felt that there was no evidence to suggest that there would be any equalities effects.

3.1.2 Since the OBC, based on further analysis of the market, the results of the statutory consultation and engagement with the ten GM local authorities, a number of further characteristics have been scoped-in to the assessment:

- Sex was scoped in prior to the consultation due to emerging evidence that men and women may be differentially or disproportionately impacted by the CAZ
- Gender re-assignment and sexual orientation are now scoped in due to use and reliance of taxis and PHVs by this community for safe travel, particularly for accessing the night-time economy within Manchester city centre.
- Religion is also scoped in post-consultation due to emerging evidence of the high % of PHV and taxi drivers that are from minority faiths, in particular those who are Muslim and the impact on other faith communities with a high proportion of small businesses, such as the Jewish community in Salford.

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Table 3: Additional protected characteristics scoped-in post consultation

Protected characteristic	Likely to be disproportionately affected	Likely to be differentially affected	Why this characteristic has now been scoped-in
Sex	✓	**x**	Sex was scoped in prior to consultation in relation to differences in use of transport and access to services and in driving occupations across the genders.
Religion or belief	✓	**x**	Religion has been scoped in post-consultation. There is evidence to suggest that a significant proportion of taxi and PHV drivers in the GM area are from minority faiths, particularly Islam and there are businesses within certain religious communities in specific GM local authorities that could be impacted, such as the Jewish community in Salford.
Gender reassignment	✓	**x**	Gender re-assignment has been scoped in post-consultation. There is anecdotal evidence to suggest that transgender individuals are more likely to access taxi and PHV services in order to safely access services and in particular, the night-time economy in the city. This group could therefore be disproportionately impacted by changes in service or cost as a result of the CAZ.
Sexual Orientation	✓	**x**	Sexual orientation has been scoped in post-consultation. There is anecdotal evidence to suggest that LGBTQ groups are more likely to access taxi and PHV services in order to access the night-time economy, particularly in the city centre. This group could therefore be disproportionately impacted by changes in service or cost as a result of the CAZ.

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3.2 Other characteristics considered by GM Local Authorities

3.2.1 Socio economic status is not a protected characteristic under the Equality Act. However, it is recognised that people who have low economic status are likely to be more vulnerable to air quality and to any economic shocks and therefore likely to be disproportionately affected by the CAZ. Where required to do so by local policy, some of the GM local authorities have considered socio-economic status within their assessments (see Appendices E - N) but it has not been included as a consideration within this core document, i.e. the GM-wide approach in order to align with the protected characteristics in the Equality Act.

3.2.2 Some of the ten local authorities also include additional characteristics within their agreed approach to EqIA, specific to their local policy but not included within the Equality Act. Where this is the case, an assessment is provided by the local authority in Appendices E - N and summarised in Table 4 below.

Table 4: Additional characteristics considered by GM Local Authorities

GM Local Authority	Additional characteristics considered within its Equality Policy
Bolton	Socio-economic groups
Bury	Veterans and Carers
Manchester	Deprivation / Low income
Oldham	Low income
Rochdale	Military Veterans, carers
Salford	Veterans, carers, homelessness and socio-economic groups
Stockport	Socio-economic groups
Tameside	Carers, military veterans, breast-feeding (specifically identified but included within maternity)
Trafford	None
Wigan	Carers, Veterans, Socio-economic groups

3.3 Development of mitigation for CAZ impacts

3.3.1 Since the OBC, informed by the feedback given during the Conversation and the consultation processes, the mitigation measures which sit alongside the CAZ to support transition to compliant vehicles have been refined to respond to a range of market, economic and equality issues. (See Section 4.1). These refinements are set out in Table 5, along with identification of which protected characteristic they mitigate effects for.

3.3.2 Detailed discussion of how these mitigation measures address identified potential equality impacts of the CAZ is set out in Section 6: Assessment of equality impacts.

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Table 5: CAP mitigation measures identified and protected characteristic groups they apply to

Mitigation measure	Details of mitigation in particular relation to Equality considerations	Changes post consultation relevant to EqIA	Age	Disability	Pregnancy and maternity	Race	Religion	Sex	Gender Reassignment
Charge exemptions	a) Permanent exemptions are proposed that ensure continued access to transport options for those that need it. b) The following exemptions are ones that will impact on protected characteristics: • Community Minibuses – Those operating under a permit under section 19 or section 22 of the Transport Act (1985), issued by a body designated by the Secretary of State • Disabled passenger vehicles as classified by the DVLA tax class – vehicles (apart from ambulances) used by organisations providing transport for disabled people. • Disabled Tax Class vehicles - Vehicles used by, or for the purposes of a disabled person which are exempt from vehicle tax, as defined by the vehicle's DVLA Tax Class. • LGVs and minibuses adapted for a disabled user – with a substantial and permanent adaptation and not used for hire or reward	• Addition to exemption of LGVs and Minibuses that are specifically adapted as Disabled User Vehicles	x	x		x	x	x	x
	c) Temporary exemptions to 31st May 2023 are proposed for some vehicles. The following ones will impact on protected characteristics: • GM licensed Hackney Carriages & PHVs • Coaches and buses not used on a registered bus service within GM. • LGVs licensed in GM • Minibuses (excluding Community Minibuses, which benefit from a permanent exemption). • Temporary exemptions to July 2022 for buses operating on school bus contracts that expire that month.	• Addition of temporary exemption of Taxi and PHVs to recover from the financial effects of COVID-19. • Clarification of temporary exemption period to be 12 months after commencement of the CAZ. • Short term exemption of school buses where the contract is due to expire in July 2022 to	x	x	x	x	x	x	x

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Mitigation measure	Details of mitigation in particular relation to Equality considerations	Changes post consultation relevant to EqIA	Age	Disability	Pregnancy and maternity	Race	Religion	Sex	Gender Reassignment
		ensure continuity of service.							
Clean bus fund	**The Clean Bus Fund aims to mitigate against potential financial impacts on bus service providers, that could result in a reduction in or increase in the cost of bus services caused by the charging. This should help maintain the supply and affordability of these services.** • **Open to all registered operators with registered bus services operating in GM** • **It will be available ahead of the CAZ to ensure that service providers can avoid charges and can plan for impact to their business.** • **Level of funding requested has increased since OBC – indicating greater emphasis on mitigating this impact.** • **A grant of up to £16,000 is available to retrofit or replace a non-compliant vehicle**	**No change**	**x**	**x**			**x**	**x**	
Clean Commercial Vehicle Fund	**The Clean Commercial Vehicle Fund proposes to offer businesses financial support in the form of a lump sum grant OR access to affordable finance to replace or retrofit non-compliant vehicles, reducing the impact of possible charges on their service provision.** **Eligible businesses include:** • **An entity registered with the Charity Commission (including being an active charity and those excepted from registration)** • **A social enterprise** **This financial support includes support to retrofit or replace coaches and minibuses (not on a registered bus service) which should help to maintain the supply and affordability of community transport.** • **Funding is targeted to support eligible small and micro businesses, sole traders, self-employed, charities, social enterprises and individuals in GM.** **Following consultation, the funding level has been increased.**	• **Increases in funds for replacement of some vehicles to reflect the market, funding gap between residual value of existing vehicle and a replacement cost and economic impacts of the COVID-19 pandemic on the market.** • **Inclusion of retrofit grants, in addition to replacement grants for LGVs and minibus to reflect changing availability of these options.**	**x**	**x**				**x**	

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Mitigation measure	Details of mitigation in particular relation to Equality considerations	Changes post consultation relevant to EqIA	Age	Disability	Pregnancy and maternity	Race	Religion	Sex	Gender Reassignment
Clean Taxi Fund	• **The Clean Taxi Fund will provide funding towards the retrofit of vehicles to meet the GM CAZ emission standards, towards the replacement of non-compliant vehicles with compliant vehicles or towards running costs when the compliant vehicle acquired with GM CAP funds has also been eligible for a Government plug-in grant**	• **Inclusion of non-WAV Hackney Carriages in funding eligibility** • **Increase in maximum grant fund levels for most Hackney Carriages and PHV vehicle types.**	x	x		x	x	x	x
Taxi Specific Electric Vehicle Infrastructure	• **The provision of 40 rapid electric vehicle charging points across GM, to be used specifically by taxis and PHVs.**	**No Change**	x	x		x	x	x	

3.3.3 The proposed final GM Clean Air Plan does not include a Hardship Fund, as proposed at consultation. Although feedback from the consultation and the impact of COVID-19 research found that further support was required for GM businesses, Government Ministers did not agree that a Hardship Fund would be the best way to mitigate the impact of uncertainty due to the pandemic. Ministers cited other COVID-response government schemes (not specific to Clean Air plans) being available to address wider business impacts.

3.3.4 However, Government have confirmed that they wish to ensure that Clean Air Funds can be adapted if necessary; and, that they will continue to work with GM to understand the situation, including the funding position, if the impacts prove to be more severe than forecast.

3.3.5 It remains important to monitor the impact of the CAZ on individuals and businesses that are economically vulnerable and their ability to access the available package of Clean Funds and Vehicle Finance.

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3.3.6 The proposed final GM Clean Air Plan does not include an option to apply for a discounted charge equivalent to 5/7 of the weekly total for GM-licensed PHVs that are also used as a private car, as proposed at consultation. From an equality perspective, in isolation the removal of the discount would impact PHV drivers, a high proportion of whom are male and from minority ethnic groups[14]. However, rather than offering a discount, GM is proposing a temporary exemption to the daily charges of the CAZ until 31 May 2023 for all GM-licensed Private Hire Vehicles and Hackney Carriages and further options for replacement and retrofit are more suitable revisions to the scheme to meet the air quality objectives.

4 Selection of equality impact indicators for this assessment

4.1 Context

4.1.1 The role of the EqIA is to identify where changes associated with the proposed measures may result in disproportionate or differential impacts, particularly in relation to groups within the community that have protected characteristics. The Distributional Impact Analysis (DIA)[15] that was prepared for the GM CAP OBC and is being refreshed for the Full Business Case (FBC) considers distributional impacts of three variables; accessibility, air quality and affordability. In order to align with the DIA, the EqIA also uses these indicators.

4.1.2 Table 6 provides a summary of why each of the EqIA impact indicators has been selected for use in the assessment. Sections 4.2 - 4.4 provide the evidence base for this selection.

Table 6: EqIA indicators used in the assessment

EqIA impact indicators	Includes	Justification for inclusion within EqIA
Air quality	Changes in air quality	Air quality is a key determinant of health and wellbeing, particularly for residents with existing health and respiratory conditions. Certain groups of people are more susceptible to changes in air quality (children, elderly, pregnant women and those with a disability or long-term limiting illness) who therefore may benefit differentially from improvements in air quality bought about by the GM CAP.

[14] Both licensed PHVs and Hackney Carriages can only be driven by a licensed driver – a vehicle used for taxi services is always a licensed taxi. Therefore, at all times it is a licensed vehicle, rather than a private car. After consideration of the feedback from consultation, GM considered that offering PHVs a discount did not provide parity with other commercial vehicles which are sometimes also used for private travel.

[15] Great Manchester's Outline Business Case to tackle Nitrogen Dioxide Exceedances at the roadside – Analysis of distributional impacts, Aecom, February 2019.

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EqIA impact indicators	Includes	Justification for inclusion within EqIA
		This reflects the DIA which identifies three groups who would potentially disproportionately benefit from improved air quality: 1) low income households, 2) children, and 3) the elderly.
Accessibility	Access provided by use of buses, coaches, minibuses, taxis and private hire vehicles.	Accessibility plays a key role in both individual and community opportunities, including accessing services, employment, and social interaction. Access to services and, in particular, access to work and employment, plays a key role in reducing socio-economic inequalities and improving economic security and opportunity. The measures will have potential impacts on the volume and/or cost of services offered by public and private buses, coaches, minibuses, taxis and private hire vehicles which could result in changes to accessibility.
Affordability	Personal affordability - Cost of transport	Affordability relates to the costs incurred by people as they travel to and from places of work, study and social activities. The GM CAP may result in changes (increases) to costs of public transport and private hire transport as vehicle operators may pass costs of compliance onto passengers or take advantage of reduction in supply within the market.
	Business affordability – costs of complying with CAP for small businesses/individuals	Vehicle operators/businesses will incur costs as they choose to either pay the clean air charges, upgrade their vehicles to compliant vehicles or cease operations. Consideration of whether some operators have a higher proportion of owners/staff with protected characteristics is needed.

4.2 Air quality indicator

4.2.1 The primary objective of the GM CAP is to achieve compliance with legal NO_2 limit values in the shortest possible time. In line with Government guidance, this is the Determining Success Factor by which the programme is appraised. Therefore, air quality is an important and very relevant equality impact indicator for this programme.

4.2.2 A fuller review of why air quality has been chosen as an equality indicator is available in Appendix B. A literature and research review of the impacts of air quality on health, the GM CAP Health Impact Evidence Review was undertaken in 2020, and an updated Distributional Impact Analysis was produced to support the Interim FBC. The key findings of these reports have been fed into this assessment.

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4.2.3 Poor air quality is one of the largest environmental risks to public health, contributing to the equivalent of 1,200 deaths a year in GM[16]. Long-term exposure to elevated levels of NO_2 and microscopic particles of matter (PMs), suspended in the air, may contribute to the development of cardiovascular or respiratory diseases and reduce life expectancy.

4.2.4 Conditions caused or exacerbated by air pollution significantly reduce quality of life. Short-term exposure to concentrations of NO_2 higher than 200 µg/m^3 can cause inflammation of the airways[17]. NO_2 can also increase susceptibility to respiratory infections and to allergens. People affected by air pollution can become less able to work and require more medical care, increasing social costs and burdening the NHS. In total, it is estimated that the health and social care costs of air pollution in England could reach £5.3 billion by 2035 unless direct action is taken[18].

4.2.5 Dajnak et al (2018) conducted a Health and Economic Impact Assessment associated with current and future pollution levels in GM. They found that:

- If the concentration of NO2 remains at predicted concentrations, between 2011 and 2030, the total number of life years lost will be 561,169 in GM.
- This will have an economic impact of £343,719,554 (based on 2014 prices).

4.2.6 In addition, Evangelopoulous et al (2019) produced quantitative statements from their research, giving the effect of a given exposure to NO_2 on a range of diseases in the City of Manchester. It is important to note that this was based on Manchester, not Greater Manchester:

- The risk of emergency hospitalisations for stroke is 2.8% higher on high air pollution (between 4401 and 1064 µg m−3 as defined by the Daily Air Quality Index9) days than on lower air pollution days (short-term)
- Lowering air pollution by 33.5% on high air pollution days could save 14 hospital admissions for stroke each year (short-term)
- A child is 4.4% more likely to be hospitalised for asthma on days with high NO_2 pollution compared to days with lower air pollution (short-term)

[16] Public Health England – Air Quality in Greater Manchester – from a Public Health Perspective (September 2018)
[17] DEFRA, Air Pollution in the UK, 2017
[18] DEFRA – Clean Air Strategy 2018 (2018)

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- Adults are 1.5% more likely to be hospitalised for asthma on days with high NO_2 pollution compared to days with lower air pollution (short-term)

- Cutting air pollution in by one fifth would increase children's lung capacity by around 2.6% (long-term)

- Cutting air pollution by one fifth would decrease the risk of babies being born underweight by around 0.1% (long-term).

4.2.7 Taking the above points into consideration, it is important to achieve regional compliance as quickly as possible, while also working to reduce localised incidences of human exposure to NO_2 in order to positively impact public health in both the short- and long-term.

4.2.8 Public Health England's guidance 'Health matters: air pollution'[19] outlines that whilst air pollution can affect everyone, some people are more affected because they live in a polluted area, are exposed to higher levels of air pollution in their day-to-day lives or are more susceptible to health problems caused by air pollution. Groups that are reported as being more vulnerable to these affects are older people, children (particularly young children), pregnant women, people living with long-term health conditions or disability and those who are living in high pollution areas and low-income communities. In the same way that these groups of people are more sensitive to high levels of air pollution, they are also likely to benefit more from any improvements in air quality.

4.2.9 The GM CAP aims to improve air quality across GM and therefore all people living within GM are likely to experience the health benefits associated with improved air quality. This indicator is included in the EqIA in order to identify which protected characteristic groups are most likely to benefit.

4.3 Accessibility indicator

4.3.1 Accessibility influences how people live, including how they access services, economic opportunity (i.e. places of work) and how they are able to socialise. The ease with which people have access can have a direct impact on health and wellbeing, socio-economic opportunity and quality of life[20].

4.3.2 Accessibility is determined by a number of factors including:

[19] Public Health England, Public Health Outcomes, http://www.phoutcomes.info/
[20] NHS, Healthy Urban Development Unit (2013), HUDU Planning for Health- Rapid Health Impact Assessment Tool, http://www.healthyurbandevelopment.nhs.uk/wp-content/uploads/2013/12/HUDU-Rapid-HIA-Tool-Jan-2013-Final.pdf

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- availability of public transport (predominantly buses, but also others such as coaches and minibuses);
- availability of private hire vehicles (including taxis, coaches, minibuses)
- frequency and efficiency of services; and
- affordability.

4.3.3 Research undertaken by University College London (UCL) on the link between transport and deprivation defines transport-related exclusion as:

"A process by which people are prevented from participating in the economic, political and social life of the community because of reduced accessibility to opportunities, services and social networks, due to whole or in part to insufficient mobility in a society and an environment built around the assumption of high mobility"[21]

4.3.4 The impacts of poor transport access can be more significant for people with protected characteristics, including older people, residents with a health condition or long-term disability, low-income households and young people. Public transport can play a key role in providing an affordable transport option. This is particularly important for low-income households, providing access to social infrastructure and economic opportunities. The same UCL research shows that more bus trips are made by the lowest income groups, who are less likely to own a car.

4.3.5 Access to reliable and regular bus, minibus, coach and taxi services is particularly in important in some communities across Greater Manchester, particularly where tram and trains do not service the local area and in the more rural neighbourhoods on the edge of the city region. Any change in services in these communities would have a greater impact on access for protected characteristics.

4.3.6 Car ownership amongst particular equalities groups tends to be low. For example, young people under 19, older people, disabled people, ethnic minorities, and those who live in economically deprived areas[22]. This makes these groups disproportionately reliant upon public transport networks, Hackney Carriages and private hire vehicles which, in their absence or where services are reduced, could lead to isolation and restricted access to social and economic activities that enhance life chances.

[21] Titheridge et al (2014) Transport and Poverty – A Review of Evidence, University College London
[22] NatCen (2019). Transport and inequality: an evidence review for the Department of Transport

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4.3.7 Private vehicle use can play a particularly important role for certain equalities groups (including older people, mothers with children or pregnant women, and residents with a form of disability), as it can provide a more direct and convenient alternative to public transport. Where car ownership is lower, for example for people with disabilities, reliance on accessible Hackney Carriages and PHVs is high.

4.4 Affordability indicator

4.4.1 Affordability is considered from two distinct perspectives:

Personal affordability

4.4.2 Personal affordability is the cost of travel for people to a place of work or education, or to participate in a social or leisure activity. The cost of travel is the fare or service charge that an individual pays to either public transport service providers or to private hire vehicles to take them where they need and want to go. People who have lower incomes or irregular incomes are more sensitive to increases in travel costs and are therefore more likely to be adversely affected by any price increases that may result from the GM CAP. The EqIA considers how people with protected characteristics may be disproportionately or differentially affected by affordability issues.

Business affordability (transport and haulage sector)

4.4.3 Vehicle operators/businesses will incur direct business costs as they choose to either pay the clean air zone charges, upgrade their vehicles to compliant vehicles or decide to cease operations.

4.4.4 An impact of the CAZ on transport and haulage businesses that are defined as micro, small and medium enterprises (MSMEs) is more likely since smaller businesses are less adaptable to increases in overhead costs that would result from either upgrading vehicles to compliant vehicles or through paying clean air zone charges. As examples:

- 69% of coach operators are small businesses[23], often providing services to older and younger people;
- Up to 36% of minibus service providers are likely to be private individuals, and businesses which may have a small number of minibuses to support their business activities[24].

[23] GM CAP Policy
[24] The Hatch Regeneris report found limited data related to this group of minibus service providers

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4.4.5 Analysis of the impact of COVID-19 since early 2020 on businesses across GM indicates a significant economic impact on many businesses in relation to reduced income and use of any cash reserves to maintain the business and / or livelihoods during the pandemic. In general, according to the Government's Business Impacts of Coronavirus Survey, by the end of 2020, 83.3% of businesses in the North-West has received a Government grant and 23.1% a government-backed loan or finance agreement.

4.4.6 In particular, taxi, PHV and coach businesses have been significantly hit:

- In September 2020, the frequency of taxi movements in GM was 39% lower overall than the same month a year before, with a 63% change for Hackney Carriages, indicating the impact on demand for business in the sector.

- 100 coach operators were estimated to have gone into administration as a result of the COVID-19 lockdown, including GM's largest operator Shearings. Some operators benefitted from the Home to School funding scheme, but this was only estimated to have supported 15-20% of the operators in GM.

4.4.7 A significant proportion of the qualitative responses in the GM CAP consultation responses from Taxi and coach operators indicate that COVID-19 leaves these businesses less resilient and more vulnerable to the impact of the CAZ in terms of business affordability moving forward, to either upgrade non-compliant vehicles or pay the CAZ charge. This has been reflected in the GM CAP Impacts of COVID-19 and the Economic Impacts of CAP reports being published to support GM's response to the consultation.

4.4.8 From the perspective of the EqIA, it is necessary to understand whether these SMEs have people employed with protected characteristics, or indeed the business owner has protected characteristics. It is also worth noting that some very small businesses may also use their PHV for personal use and would therefore be affected not only when they are working, but also during personal usage.

4.4.9 The Hatch Regeneris socio-economic impact research[25] identifies the following facts related to the transport and haulage business sector that informs this EqIA:

[25] CAZ Commercial Vehicle Socio-Economic Impacts Research, 2019. Hatch Regeneris

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- Gender: Bus and coach drivers are more likely to be male than female (94% male);
- Gender: 96% of taxi drivers are male;
- Age: The average age of a taxi driver is 48;
- Ethnicity: Over 50% of all taxi drivers (England wide) are from non-white British ethnic background.

4.4.10 In addition, other sources re-affirm the gender and age statistics in the transport sector:

- Gender: www.womenintransport.com state that only 8% of drivers in the industry are women
- Age: The Road Haulage Association states that the average age of drivers is 57 years old.

5 Baseline

5.1 Context

5.1.1 In order to understand whether there are likely to be any equality impacts, it is necessary to understand the demographic profile of the GM area. Appendix A sets out a detailed baseline related to all protected characteristics within the population of GM. This section provides a brief summary of protected characteristic data that has been screened into the assessment (Section 3).

5.2 Population and gender

5.2.1 The population across GM stood at 2,835,700 in 2019 which represents a 7.4% increase since 2009[26]. This is predicted to increase by a further 8% over the next 20 years. The population of the districts within GM is split more or less evenly between male and females, with slightly more females in all districts, except for Manchester and Salford where it is the opposite.

[26] ONS (2019) Population Estimates for England and Wales Mid-2019. Available at: https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/datasets/populationestimatesforukenglandandwalesscotlandandnorthernireland

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5.2.2 Female life expectancy is consistently above male life expectancy[27]. The authorities with the highest life expectancy at birth are Trafford (83.9 years for females; 80.1 for males) and Stockport (83.3 years for females; 80.1 for males), which are above the national, regional and sub-regional averages. The local authority with the lowest life expectancy is Manchester (79.8 years for females; 76.1 years for males).

5.3 Age

5.3.1 Across GM, the split between the sexes is reflective of the statistic across the whole of England and the North West[28].

5.3.2 In comparison with the average for England, GM has a similar proportion of the population aged 16-64 with approximately 63% of the population being within this working age group.[29]

5.4 Disability and health

5.4.1 There are considerable health inequalities across GM which means that some areas experience much higher levels of illness and health related disability than others. In 2019 the Index of Multiple Deprivation (IMD) ranked Manchester as being the 2nd most deprived local authority in England (out of 151) in relation to health and disability. There will also be variations in health and disability within Local Authority areas and any significant differences are drawn out in the local authority assessments in Appendices E - N.

5.4.2 In addition to the IMD, the 2011 census collected self-reported data on the percentage of people whose day to day activities are limited as a result of disability. This identified that 9.7% of the resident population within GM are limited a lot by a disability. This is above the England average of 8.3% but a little less than the average across the North West (10.3%). This data is available by age group which can be used to identify the age groups most affected by health conditions and disability; within GM (and within each district) the age bracket 45-69 has the largest number of residents with a disability or long-term health condition (4.09% of total resident population). However, as there are fewer residents in the 85+ age bracket, the percentage who live with disability in this age group is proportionately higher. The national distribution across the age brackets is similar although the proportion of residents within GM is slightly higher in all ages, except for 85+.

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[27] ONS (2018) Life expectancy at birth and at age 65 by Local Areas, UK, 2015-2017. Available at https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/healthandlifeexpectancies/datasets/lifeexpectancyatbirthandatage65bylocalareasuk

[28] ONS Area profiles, 2018. Available at: https://www.nomisweb.co.uk/home/profiles.asp

[29] ONS (2019) Population Estimates for England and Wales Mid-2019. Available at: https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/datasets/populationestimatesforukenglandandwalesscotlandandnorthernireland

5.4.3 Statistics of the number of valid Blue Badges held by individuals within GM identifies Wigan as having the highest proportion (6.1%) whilst Manchester has the lowest proportion (2.9%).

5.5 Pregnancy and maternity

5.5.1 Data available from ONS provides details of live births for 2019[30]. This therefore does not capture the total number of pregnancies which may not end in a live birth (either as a result of termination or miscarriage). Across GM in 2019, it was estimated that 2.28% of the female population had a live birth. This is slightly higher than the England average of 2.21% however there is variation across GM with Manchester having the highest percentage (5.15%) and Bury having the lowest (1.58%).

5.6 Ethnicity/race

5.6.1 ONS Census data[31] show that there is significant variation in ethnic groups across GM's districts. The majority of the GM population is white, although compared to England and Wales as a whole this percentage is slightly lower. The proportion of people classified as Asian in GM is higher than the national average, whilst there are fewer people classified as Black than in England and Wales as a whole. Across the LA areas there is significant variation in the proportion of variation with Wigan being the least diverse authority area and Oldham being the most diverse.

5.7 Religion

5.7.1 ONS Census data[32] show that there is significant variation in religion and beliefs across GM's districts. The majority of the GM population is Christian, with a slightly higher proportion than England and Wales as a whole. The proportion of Muslim and Jewish people in GM is considerably higher than the national average whilst there are fewer people in GM reporting no belief than the national average.

5.7.2 In particular, Oldham, Manchester, Rochdale and Bolton have a greater % of Muslim population than the GM average of 8.9%, ranging from 11.7 – 18.7%. Bury, Salford and Trafford have higher Jewish populations than the GM and national averages.

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[30] ONS (2019) www.nomisweb.co.uk/query 2019 data for live births
[31] ONS (2011) Census data by local authority: ethnic groups UK. Available at: http://infuse2011.mimas.ac.uk/
[32] ONS (2011) Census data by local authority: religion or belief. Available at: http://infuse2011.mimas.ac.uk/

5.8 Gender reassignment

5.8.1 There are multiple definitions of transgender. For the purposes of this report, following the approach taken by the Office for National Statistics, the common umbrella term 'trans' is used to refer to people whose lived identities conflict with societal gender norms. This encompasses a range of identities from those who cross-dress to those people who identify their own gender differently to that assigned to them at birth. It also includes individuals who identify as androgynous, non-gendered or non-binary. Importantly, it is not limited to people who have undergone gender reassignment surgery.

5.8.2 No data sets are available to allow the identification of the proportion of trans people in the population for the purposes of this EqIA. Publicly collected data on trans people is "virtually non-existent"[33]. One source, collected by the Gender Identity Research and Education Society (GIRES) for the Home Office in 2009, identified between 300,000 and 500,000 people in the UK with some degree of gender variance. This represents some 0.4% to 0.8% of the UK population. There is no evidence on the spatial distribution of trans people around the UK but applying those figures to known population figures across GM suggests there could be somewhere in the region of 11,250 to 22,500 people with some degree of gender variance (out of a total population of 2,812,600). These figures should be regarded as illustrative.

5.9 Sexual orientation

5.9.1 Information on sexual orientation is available through the Office of National Statistics. Statistics related to sexual orientation have not been collected for very long and are therefore experimental statistics which means that they are being developed and currently in the testing phase. The North West of England has a lower proportion of LGB residents (1.29%) compared to London (2.6%) and the south West (2.4%).

5.9.2 Manchester City Centre is home to the "Gay Village", playing a significant community role for Greater Manchester's LGBTQ community.

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[33] Equalities & Human Rights Commission, 'Trans Inequalities Reviewed'. Available at: https://www.equalityhumanrights.com/en/trans-inequalities-reviewed/introduction-review

6 Assessment of equality impacts

6.1 Context

6.1.1 Following initial screening, a detailed assessment has been carried out to include discussion of the evidence base to support the conclusions being made.

6.1.2 The defined equality impact indicators have been considered against the following criteria:

- Receptor group – identification of which protected characteristic group/s are likely to be affected and why;
- Positive/ negative – identification of whether the change is likely to have beneficial or adverse impacts on protected characteristics groups; and
- Extent of population exposure – the consideration of the number of people, equalities groups or catchment areas likely to be impacted by the change.

6.1.3 An initial assessment is made on equality impacts related to the implementation of the CAZ. Where the CAP includes measures to mitigate these identified impacts a view is made on whether they would be successful at avoiding or reducing the magnitude of any equalities impacts, or whether there would be any indirect impacts from the mitigation measures themselves.

6.1.4 Through demographic profiling, the equalities assessment identifies whether the impact is proportionate. The assessment of proportionality is based on an assessment of whether a given impact is likely to be felt more, less or differently by protected characteristic groups than by members of the general population in the same area. It includes whether an impact is differential, and therefore is likely to have a different impact on protected characteristic groups due to specific needs, greater sensitivity, or the reduced ability to accommodate change. It also considers whether there are impacts which are likely to be experienced in the same way by all, but which occur in areas with disproportionate numbers of people sharing one or more protected characteristics.

6.1.5 A summary table has been provided for each equality indicator in sections 6.1-6.3 below. Colour coding has been used to illustrate the assessed level of impact both before and after mitigation measures. The following key has been used:

- Green – Positive benefit

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- Amber – Low adverse impact
- Red – High or medium adverse impact

6.2 Air quality – potential impacts

CAZ impacts

6.2.1 Groups that are more vulnerable to poor air quality include older people, children (particularly young children), pregnant women and people living with long-term health conditions or disability. Any improvements in air quality are therefore likely to differentially benefit these groups (see section 4.1).

6.2.2 Areas of existing high pollution often correlate with low income communities and therefore any improvements in air quality would benefit these communities disproportionately. Economically disadvantaged groups are more likely to include young people, unemployed, long term sick and people from ethnic minority backgrounds. This correlates with the OBC DIA which shows that those living within areas of highest deprivation, would experience the highest reductions in emissions as a result of the CAP.

Mitigation measures

6.2.3 The impacts from reduced emissions are already beneficial. However, the mitigation measures aim to increase the rate and scale of upgrade to compliant vehicles by reducing the barriers for owners and operators of buses, coaches, minibuses, taxis, PHVs, HGVs and light goods vehicles (LGVs). Air quality modelling undertaken for GM indicate that this will lead to beneficial air quality impacts coming forward sooner than they may otherwise.

Effect of changes to measures post-consultation on air quality

6.2.4 In developing a response to the statutory consultation feedback, the mitigation measures within the GM CAP have been reviewed and any changes reflected in the GM CAP Policy.

6.2.5 A key criterion throughout the consultation review process, was whether a potential change to the policy, made in response to the consultation would impact on achievement of compliance with the legal NO_2 levels “in the shortest possible time”. This was key to ensure that policy changes neither compromised compliance with the government direction nor the resulting health benefits.

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6.2.6 Air quality modelling has been undertaken to test the assumptions associated with the current GM CAP Policy and the delay of implementation of the CAZ to 2022 due to the COVID-19 pandemic, and to confirm compliance with the government direction.

Summary of air quality impacts

6.2.7 Table 7 identifies which protected characteristic groups are likely to experience disproportionate and/or differential health benefits from improved air quality and what extent of the population the impact applies to. As cleaner air will benefit all people within GM, the extent of the population with protected characteristics is considered as high for both pre and post mitigation.

Impact	Direct/ Indirect	Beneficial/ Adverse	Extent of population exposure		Age (young people)	Age (older people)	Disability	Pregnancy and	Race	Religion / belief	Sex	Gender Re-assignment	Sexual Orientation
			Pre-mitigation Measures	Post mitigation measures									
Improvements in air quality	**Direct**	**Beneficial**	**High**	**High**	x	x / ●	x / ●	●	●				

Table 7 Air quality differential (x) or disproportionate (●) impacts

6.3 Accessibility – potential impacts

CAZ impacts

6.3.1 The CAZ sets out the potential charges for non-compliant buses, coaches, minibuses (except community minibuses which are exempt) and taxi & PHVs. As such, there is a risk that charges for non-compliant vehicles used in these modes of public transport might result in a reduction in the number or frequency of services, or in fare increases as costs are passed on to customers.

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6.3.2 For bus users, both a reduction in service and fare increases are likely to have a disproportionate effect on people who rely on public transport as their main or only form of transport to access work, education or social activities. In particular, concessionary card holders who make up an average of 34% of all local bus journeys in the UK[34] could be particularly affected. Concessionary schemes in GM[35] include free travel for older people (of state retirement age), a Women's Concessionary Travel Scheme, passes for young people including the igo card for 11 to 16 years olds and Free Schools Pass, Scholar's Pass for 16-18 years and free or low cost travel pass for disabled people. Other groups that are likely to be disproportionately affected include people of ethnic minority background and women who are more likely to rely on public transport.

6.3.3 There are estimated to be just over 2000 minibuses operating in GM[36] and community minibuses are permanently exempt from the GM CAZ charge which helps to mitigate some of the risk to services that minibuses offer to protected characteristic groups in GM. Changes to the availability of private minibuses is likely to affect young people who use these services in school or for sporting activities. According to Technical Note 18 submitted to JAQU - GM CAP Minibus Vehicle Research, in GM[37], 10% of the minibus market are leasing/rental companies, which are estimated to lease 70% of their vehicles to educational facilities. For non-compliant vehicles in the leasing market, the CAZ charge could potentially raise the operating cost, with these increases being passed on to the customer. Oldham has the least compliant minibus operators, with all 201 vehicles being non-compliant, yet Oldham also has the highest 0-16 population out of all local authorities (22.6%).

6.3.4 It is possible that communities of older people and those with ill health or disabilities, who rely on minibuses supplied particularly by the charity sector to transport them to social, health and workplaces would also be disproportionately affected.

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[34] Department for Transport (2019) Annual bus Statistics: England 2017/2018
[35] https://tfgm.com/tickets-and-passes/apply-for-a-new-pass
[36] https://assets.ctfassets.net/tlpgbvy1k6h2/3fR4HEB016Z572elRIs8wx/ddfa01e92fb972d2d5297e04c78f046a/37_-_GM_CAP_Vehicle_population_estimates.pdf
[37] AECOM (2019) Impact Assessment Technical Note 18 – GM CAP Minibus Vehicle Research

6.3.5 For taxi and PHVs use, a reduction in the availability of taxis and PHVs would likely have a disproportionate impact on elderly populations and disabled people who are more reliant on these services than most of the population. In a consultation activity with taxi and PHV drivers and operators in 2019[38], they were concerned that surpluses from increased fare charges being invested in public transport would lead to a modal shift from taxis and PHVs to public transport, consequently reducing demand for the trade. Drivers felt this impact would particularly affect wheelchair users, who are often price sensitive to increases in fares and reliant on the accessibility of taxis and PHVs. Qualitative feedback during the GM CAP consultation in 2020 indicated a strong view from businesses, including Hackney carriage and PHV operators and sole traders that COVID-19 had resulted in decreased business resilience and increased uncertainty and that any additional impact on operating costs could result in businesses ceasing to operate.

Mitigation measures for accessibility impacts

6.3.6 The Clean Bus, Clean Taxi and Clean Commercial Vehicle Funds should also help to mitigate potential reductions in service provision by providing registered keepers of non-compliant vehicles with options for reducing the financial impact of retrofitting or replacing their vehicle. This should reduce the likelihood of service providers being unable to afford to keep the business or a particular service running. There is a chance that smaller operators and/or individual owners of non-compliant vehicles could still find it economically unviable to continue to provide a service, therefore whilst mitigation against service reduction is in place, services may be reduced/lost, particularly within the charity sector and in relation to taxis – both hit hard by the COVID-19 pandemic.

6.3.7 In terms of bus services, air quality modelling post-consultation assumes a high degree of take-up of Clean Bus Funding and subsequent compliance of buses on GM-registered bus services, indicating a low level of concern in terms service reduction on these routes.

6.3.8 Other mitigations put in place and refined post-consultation should further reduce the risk of service loss:

[38] SYSTRA (2019) Deliberative Research with Taxi and PHV Drivers/Operators

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- A temporary exemption of PHVs, hackney carriages, minibuses and coaches (not on a registered bus route) to the CAZ charge until 31st May 2023 is proposed, post-consultation. This aims to provide time for businesses and individual owners to recover from the economic impacts of COVID-19 and should help to mitigate the service loss risk.

- The prioritisation of the Clean Taxi and Clean Commercial Vehicle Funds to micro and small businesses, sole traders, social enterprises and charities should ensure that those most vulnerable received support, further mitigating the risk.

- The availability of the Vehicle Finance options in 2021, ahead of the GM CAZ charging zone going live, so that businesses have time to upgrade in time to avoid the charge.

- Increases in the maximum amount of funds per vehicle for most (but not all) eligible vehicles to offer greater support for businesses and individuals to upgrade their non-compliant vehicles and avoid the charge.

6.3.9 In addition to the above measures that should reduce adverse impacts on accessibility, the following changes have also been put in place as a result of the feedback from the consultation:

- LGVs / minibuses adapted for use by or for a disabled user, and not used for hire or reward are to be permanently exempt from the CAZ charge - ensuring that disabled people and their families and carers are not negatively impacted by the charge.

- An increase in the maximum amount of Vehicle Finance available per vehicle has been made to reflect the market, the funding gap between residual value of existing vehicle and a replacement cost and economic impacts of COVID-19 on the market.

6.4 Summary of impacts related to accessibility

6.4.1 Table 8 identifies which protected characteristic groups are likely to experience disproportionate and/or differential impacts in relation to accessibility and what extent of the population the impact applies to before and after mitigation measures.

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Table 8 Accessibility differential (x) or disproportionate (•) impacts

Impact	Direct/ Indirect	Beneficial/ Adverse	Extent of population exposure to impact before mitigation	Extent of population exposure to impact post mitigation	Age (young people)	Age (older people)	Disability	Pregnancy and maternity	Race	Religion / belief	Sex	Gender Reassignment	**Sexual Orientation**
Reduction in bus services	Direct	Adverse	Medium	Low	•	•	•		•		•		
Reductions in taxi/PHV services	Direct	Adverse	Medium	Low		•	•					x	x
Reduction in availability of minibuses and community transport	Direct	Adverse	Low	Low	•	•	•						

6.5 Affordability – potential CAZ impacts

Business affordability

6.5.1 The CAZ could result in increased operational costs as businesses either choose to upgrade their vehicles to compliant ones or, as a least favoured option, to pay the charge. This is especially the case for smaller businesses.

- As seen in the AECOM Impact Assessment Technical Note 4 – GM CAP Coach Market Analysis[39], 71 coach operators (69%) in GM have between 1 and 5 coaches. For small coach operators with a fleet size between 1-10 coaches, average non-compliance was 91%, and all operators with just one vehicle were non-compliant. According to the same analysis, 85% of minibuses in GM were non-compliant.

[39] https://cleanairgm.com/technical-documents (Note that this document is commercially sensitive and not for publication)

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- According to evidence gathered from the AECOM Impact Assessment Note 3 - GM CAP Freight Market Analysis there has been a 59% growth in the Light Commercial Vehicle (LCV) sector since 2000, driven by increase in the number of self-employed tradesmen and the rapid rise in online-shopping. The van sector is more reliant on second and third hand vans, that are in turn more likely to be impacted by the CAZ.

- Technical note 19[40] summarised that in GM "taxi market is seen to have a high level of noncompliance in line with the proposed CAZ charge. As a result, the majority of drivers within GM are seen to have some level of vulnerability to the proposed charge."

6.5.2 This leaves small businesses (including microbusinesses and sole traders) vulnerable in terms of business affordability to the CAZ charges.

6.5.3 Data is not available to identify whether these affected business owners and workers have protected characteristics. However, it is known that 96% of taxi drivers are male, their average age is 48 years old and across England 50% are from minority ethnic backgrounds. There is no reason to suppose that the demographics of taxi drivers in GM are significantly different from this and indeed, this data was reflected in the responses to the GM CAP consultation in 2020. Therefore, any change to business affordability is likely to be disproportionately adverse for men, minority ethnic groups and some religious groups.

6.5.4 In GM, the majority of taxi and PHV drivers are self-employed (81%) and own or rent the vehicles they use; therefore, business affordability has a direct effect on their personal financial position. These drivers may also use the taxi vehicle for personal transportation as well as business use, but under licensing law the vehicle can only be driven by the licensed driver[41]. In these instances, individuals would be adversely affected from both a personal and a business perspective and therefore be disproportionately affected.

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[40] Technical Note 19 – GM CAP Taxi and PHV Fleet Research https://assets.ctfassets.net/tlpgbvy1k6h2/6ufoIhNI2PUaNtgsHZUJpq/b8658d8849db7fb54bd2ea5f21733b1b/19_-_GM_CAP_Taxi_and_Private_Hire_Vehicle_Fleet_Research.pdf

[41] AECOM (2019) Impact Assessment Technical Note 19 – GM CAP Taxi and PHV Fleet Research

6.5.5 Concern was raised in consultation undertaken in GM with Taxi and PHV drivers on the impact the CAZ would have on the value of their non-compliant vehicles if they were to upgrade. This was also raised as an issue in the Note 4 – GM CAP Coach Market Analysis and the Note 3 – GM CAP Freight Market Analysis[42], with Note 3 showing that the cost increase experienced by SMEs running second life freight vehicles would be around 50-70% higher than that of larger businesses running first life vehicles in many cases.

6.5.6 Where business owners are older, they may struggle to upgrade their vehicle due to difficulties getting credit or because they do not have enough working years ahead of them to justify or repay the investment. The taxi driver population may be a good example of this, and a taxi census undertaken in July 2020 highlighted that 58% of drivers were aged 45 years and over, with 25% were 55 years and over.

Personal affordability

6.5.7 Personal affordability is the cost of travel for people to a place of work or education, or to participate in a social or leisure activity. The DIA considers personal affordability in relation to fuel consumption, non-fuel operating costs (tyres, oil, etc), clean air charges and time benefits. However, it does not include consideration of the effects of any price increases in public transport, taxi and PHVs. With the introduction of the CAZ, there is a possibility that compliance costs would be passed onto passengers: this was re-iterated by the GM consultation with taxi and PHV drivers in 2019. In this instance, people who use public transport, taxis or private hire vehicles frequently are most likely to be adversely affected by price increases.

6.5.8 Older people and disabled people are more likely to be dependent on this type of transport because they are not able to drive themselves. Alternatively, they may be reliant on taxi and PHV services as they are either physically not able to access public transport or feel vulnerable doing so, and therefore chose to pay for taxis/PHVs. Other groups that may be adversely affected by price increases include school/educational groups and community groups that use PHVs for accessing educational, sporting or social events.

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[42] AECOM (2019) Impact Assessment Technical Note 3 – GM CAP Freight Market Analysis

6.6 Mitigation measures for affordability impacts

Business affordability mitigation

6.6.1 The suite of CAP funding and finance measures described in 6.3.2 above will also mitigate the extent of adverse impacts the CAZ will place on business owners – both individuals and operators of small and large fleets. However, there will still, inevitably be a cost involved, which would most likely be felt disproportionately by individuals and small businesses with only few vehicles (and which make up a large portion of the company assets).

6.6.2 The mitigation measures may not be effective for older business owners for whom (as mentioned above) the offered finance options would not be considered an appropriate investment given the short time remaining until retirement and the reduced pay-back time.

Personal affordability mitigation

6.6.3 The funding measures aimed at mitigating impacts on businesses will also indirectly mitigate the adverse impacts on personal affordability. This is because the likelihood of fare increases is reduced as businesses are more likely to be able to finance the upgrade to compliant vehicles without needing to pass additional costs onto customers or ending business.

6.7 Summary of impacts related to affordability

6.7.1 Table 9 identifies which protected characteristic groups are likely to experience disproportionate and/or differential impacts in relation to affordability and what extent of the population the impact applies to before and after mitigation measures.

Table 9 Affordability differential (x) and disproportionate (•) impacts

Impact	Direct/ Indirect	Beneficial / Adverse	Extent of population exposure to impact before mitigation	Extent of population exposure to impact after mitigation	Age (young people)	Age (older people)	Disability	Pregnancy and maternity	Race	Religion / belief	Sex	Gender Reassignment	**Sexual Orientation**
Increased cost of travel to places of work, education, worship	Direct	Adverse	Medium	Low	•	•	•					x	x

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Impact	Direct/ Indirect	Beneficial / Adverse	Extent of population exposure to impact before mitigation	Extent of population exposure to impact after mitigation	Age (young people)	Age (older people)	Disability	Pregnancy and maternity	Race	Religion / belief	Sex	Gender Reassignment	**Sexual Orientation**
social/leisure activities													
Increased business costs	Direct	Adverse	High	Medium		x			●	●	●		

7 Summary of effects

7.1.1 On completion of the assessment, a summary table identifying where differential or disproportionate effects have been identified for each of the protected characteristics has been completed. Table 10 below provides a visual summary of the assessment outcomes, which demonstrates that the majority of adverse equality effects before CAP measures relate to accessibility and affordability.

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7.1.2 Table 10: Summary of potential Equality Impacts from each of the GM CAP policies

Key: - adverse impact, + positive impact, extent of population exposure to impact

Protected characteristic	Assessment topic	Impact (+/-)	Magnitude of CAZ impact[#]	Magnitude of impact post mitigation[#]	Differential/ Disproportionate	Reason for impact
Age	Air quality	+	High	High	Differential	Younger and older people are more sensitive to changes in air quality and will benefit more quickly from improvements in air quality.
	Accessibility	-	Low/Medium	Low	Disproportionate	Younger and older people are more reliant on public transport, taxi and PHVs. They are also more likely to use minibuses and community transport. Any changes in provision would have a disproportionate impact on this group.
	Affordability	-	Medium	Low	Disproportionate	Younger and older people are more reliant on public transport, so any ticket prices increases would be disproportionately experienced by these groups.
Disability[43]	Air quality	+	High	High	Differential	People with disabilities (particularly if these relate to respiratory problems) are likely to be more sensitive to changes in air quality and will benefit more quickly from improvements in air quality.
	Accessibility	-	Low/Medium	Low	Disproportionate	Disabled people are more reliant on public transport, taxi and PHVs because they are more likely to not drive. They are also more likely to use community transport and be reliant on parking

[43] Disability covers a wide range of physical and mental impairment. Where the impact would differ dependent on disability this is flagged in the narrative.

Protected characteristic	Assessment topic	Impact (+/-)	Magnitude of CAZ impact#	Magnitude of impact post mitigation#	Differential/ Disproportionate	Reason for impact
						provision. Any changes in provision would have a disproportionate impact on this group
	Affordability	-	Medium	Low	Disproportionate	Disabled people are more reliant on public transport, taxis and PHVs. Increased cost of travel to places of work, education, social/leisure activities if costs related to non-compliance/upgrading to a compliant vehicle are passed onto passengers.
Pregnancy and maternity	Air quality	+	High	High	Differential	Extremely low-dose exposures to pollutants during windows of vulnerability in utero and in early infancy may result in health effects throughout their lifespan[13].
	Accessibility	No equality impact				
	Affordability	No equality impact				
Race[44]	Air quality	+	High	High	Disproportionate	People from ethnic minority backgrounds are more likely to live in areas of GM where air quality is currently poorest. They will therefore disproportionately benefit from improvements in air quality.

[44] Race covers all races identified within the ONS dataset. Where the impact would differ for different races, this is identified in the narrative.

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Protected characteristic	Assessment topic	Impact (+/-)	Magnitude of CAZ impact[#]	Magnitude of impact post mitigation[#]	Differential/ Disproportionate	Reason for impact
	Accessibility	-	Medium	Low	Disproportionate	People from ethnic minority backgrounds are more reliant on public transport therefore changes in service would affect them disproportionately.
	Affordability	-	High	Low	Disproportionate	People from ethnic minority backgrounds are more reliant on public transport therefore increased costs would affect them disproportionately. A high proportion of taxi drivers are from ethnic minority backgrounds. Any increases in business costs are therefore likely to be experienced disproportionately by this group.
Religion / Belief[45]	Air quality	+	High	High	Disproportionate	People from ethnic minority backgrounds are more likely to live in areas of GM where air quality is currently poorest. They will therefore disproportionately benefit from improvements in air quality.
	Accessibility	No equality impact				
	Affordability	-	Medium	Low	Disproportionate	A high proportion of taxi drivers are from Muslim backgrounds in particular. Any increases in business costs are therefore likely to be experienced disproportionately by this group.

[45] Religion / belief covers all religions identified in the ONS data. Where an impact would differ for different religious groups, this has been drawn out in the narrative.

Protected characteristic	Assessment topic	Impact (+/-)	Magnitude of CAZ impact[#]	Magnitude of impact post mitigation[#]	Differential/ Disproportionate	Reason for impact
Sex	Air quality	No equality impact				
	Accessibility	No equality impact				
	Affordability	-	High / Medium	Medium	Disproportionate	Taxi drivers, PHV drivers and bus drivers are over 90% more likely to be male than female. Any business costs are therefore likely to be disproportionately experienced by men.
Gender Reassignment	Air quality	No equality impact				
	Accessibility	-	Medium	Low	Disproportionate	There is anecdotal evidence to suggest that transgender individuals are more likely to access taxi and PHV services in order to access the night-time economy, particularly in the city centre.
	Affordability	No equality impact				
Sexual Orientation	Air quality	No equality impact				
	Accessibility	-	Medium	Low	Disproportionate	There is anecdotal evidence to suggest that the LGBTQ community is more likely to access taxi and PHV services in order

Protected characteristic	Assessment topic	Impact (+/-)	Magnitude of CAZ impact[#]	Magnitude of impact post mitigation[#]	Differential/ Disproportionate	Reason for impact
						to access services safely, particularly after dark and to access the night-time economy in the city centre.
	Affordability	No equality impact				

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7.1.3 Following implementation of CAP measures, the magnitude of adverse impacts is expected to reduce, as illustrated in the summary Table 10.

Table 10: Residual potential negative impacts by characteristic

Degree of adverse impact with implementation of mitigating measures	**Affordability**	**Accessibility**
Medium adverse impact	Sex (male drivers)	-
Low adverse impact	Race Religion Disability Age (young and older people)	Race Disability Age (young and older people) Gender Reassignment Sexual Orientation

7.1.4 The next steps to continue to focus on and monitor these adverse impacts are highlighted in section 9.

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8 Summary of Local Authority Assessments

8.1 Context

8.1.1 Each of the 10 GM Local Authorities has completed an assessment of equality impacts for their district. These are included in Appendix E – N (in alphabetical order) with each LA utilising the same proforma. This approach aimed to identify any differences between the LA areas and the details provided at a GM level, highlighting any particular outliers in terms of number of people with protected characteristics, or wards/areas with LAs which have particularly high numbers of people with protected characteristics. Overall, the assessments of the individual local authorities in respect of protected characteristics are in alignment with the GM-wide assessment.

8.1.2 Socioeconomic status is not included as a protected characteristic in the Equality Act, 2010 and has not been considered within the GM EqIA in order to keep it aligned with current TfGM policy and the Equality Act. However, people who have low socioeconomic status or live within areas of deprivation are often more likely to be sensitive to changes in the physical and financial environment around them. As a result, many LAs include consideration of socioeconomic status within their EqIA processes and this is reflected in the assessments that have been carried out. In addition, some LAs include other characteristics within their list of protected characteristics such as carers and military veterans (See Section 3.2 for full details).

8.1.3 Any noteworthy differences between the LA baseline data and the EqIA outcomes and those in the GM assessment are drawn out in section 8.1 – 8.10 below. These highlights should be considered alongside the corresponding local authority appendices. **Where outcomes for a protected characteristic are not mentioned under each LA, outcomes were the same as per the GM assessment.**

8.2 Bolton

8.2.1 Bolton's report highlights the new and emerging communities that have settled in the borough through economic migration or through Britain's asylum and refugee arrangements. In addition, the higher proportion generally of minority ethnic groups, particularly Asian is identified. No other differences were identified between Bolton and GM baseline data in relation to protected characteristics.

8.2.2 With regards to EqIA outcomes, differences to the GM EqIA are highlighted below:

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	Assessment topic	Impact (+/-)	GM impact magnitude	Bolton impact magnitude	Impact type*	LA Justification
Disability	**Accessibility**	**-**	**Low**	**Medium**	●	Bolton has a slightly higher proportion of disabled people than GM
	Affordability	**-**	**Low**	**Medium**	●	Bolton has a slightly higher proportion of disabled people than GM
Race	**Accessibility**	**-**	**Low**	**Medium**	●	Higher proportion of minority ethnic groups, particularly Asian
	Affordability	**-**	**Low**	**Medium**	●	Higher proportion of minority ethnic groups, particularly Asian
Religion/ Belief	**Accessibility**	**-**	**No equality impact**	**Medium**	●	Bolton has a higher proportion of minority ethnic groups, in particular Asian communities who are more likely to live in households without access to a car. Any changes in service availability would therefore affect this group.
	Affordability	**-**	**Low**	**Medium**	●	Bolton has a very diverse community with a significant number of the population being Muslim and Hindu. More people are therefore likely to be affected by changes in affordability.
Socio-economic	**Air quality**	**+**	**Not assessed for GM**	**High**	●	Many of Bolton's Air Quality Management Areas are located in the borough's more deprived areas.[46] Therefore any improvements in air quality will affect more people with this characteristic.
	Accessibility	**-**	**Not assessed for GM**	**Medium**	●	People in households with lower incomes are more likely to be reliant on public transport. Any changes in service availability would therefore affect this group.
	Affordability	**-**	**Not assessed for GM**	**Medium**	●	People in households with lower incomes are more likely to be reliant on public transport. Any changes in fare costs would therefore affect this group.

[46] **GMCA (2021). *Mapping GM*. Available at: GM Open Data Infrastructure Map | MappingGM. (Accessed 15th April 2021).**

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*differential (x) or disproportionate (•)

8.3 Bury

8.3.1 One specific difference was identified between Bury and GM for baseline data related to protected characteristics. This relates to religion where a higher than GM average of people with a Jewish faith live in Bury.

8.3.2 With regards to EqIA outcomes, differences to the GM EqIA are highlighted below:

	Assessment topic	Impact (+/-)	GM impact magnitude	Bury impact magnitude	Impact type*	LA Justification
Socio-economic	**Air quality**	**+**	**Not assessed for GM**	**High**	●	There are areas of higher levels of deprivation within the borough than others. These areas are therefore likely to benefit more.
	Accessibility	**-**	**Not assessed for GM**	**Low**	●	Socio -economically vulnerable people are more reliant on public transport. Any reduction in services would therefore disproportionately affect accessibility for this group of people, particularly in Bury East where there are high levels of deprivation.
	Affordability	**-**	**Not assessed for GM**	**Medium**	●	Socio -economically vulnerable people are more reliant on public transport. Increase in fare cost would therefore disproportionately affect affordability for this group of people, particularly in Bury East where there are high levels of deprivation.

*differential (x) or disproportionate (•)

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8.4 Manchester

8.4.1 No differences are identified between the assessment outcomes of the GM and Manchester EqIAs. However, Manchester City Council EqIA does identify a need to consider digital access (to information and funding options) in recognition that digital access is sometime limited for young people living in poverty and older people.

8.5 Oldham

	Assessment topic	Impact (+/-)	GM impact magnitude	Oldham impact magnitude	Impact type*	LA Justification
Race	**Affordability**	**-**	**Low**	**Medium**	●	Oldham has a larger percentage of minority ethnic residents than the Greater Manchester average due to their large Bangladeshi and Pakistani communities, a high number of which work in the taxi trade, therefore anything that effects affordability in this sector may have a higher disproportionate effect in Oldham than in Greater Manchester.
Religion	**Affordability**	**-**	**Low**	**Medium**	●	Oldham has a larger percentage of Muslims than the Greater Manchester average due to its large Bangladeshi and Pakistani communities, a high number of which work in the taxi trade, therefore anything that effects affordability in this sector may have a higher disproportionate effect in Oldham than in Greater Manchester.

*differential (x) or disproportionate (•)

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8.6 Rochdale

	Assessment topic	Impact (+/-)	GM impact magnitude	Rochdale impact magnitude	Impact type*	LA Justification
Disability	**Accessibility**	-	**Low/ medium**	**High**	●	Rochdale has significantly higher ratios of deprived residents, blue badge holders, disability benefit claimants, and people self-reporting that they have a disability than the GM average. Relative to the GM boroughs, Rochdale is: - 4th lowest for overall deprivation - Highest for disability benefit claimants - Joint second highest for blue badge holders Therefore, the accessibility of public transport, PHV or Hackney vehicles will be significantly higher in Rochdale compared to GM.
	Affordability	-	**Medium**	**High**	●	Rochdale has higher ratios of deprived residents, blue badge holders, disability benefit claimants, and people self-reporting that they have a disability than the GM average. Relative to the GM boroughs, Rochdale is: - 4th lowest for overall deprivation - Highest for disability benefit claimants - Joint second highest for blue badge holders Therefore, the proportion of people that may be adversely affected by changes to the affordability of public transport, PHV or Hackney vehicles will be higher in Rochdale compared to GM.
Carers	**Accessibility / Affordability**	-	**Not assessed for GM**	**Low/ Medium**	●	Due to the generally older age profile and poorer health of carers, it is likely that they will be affected by the GM Clean Air Plan in a similar way to people with disabilities – being more reliant on community transport, public transport, taxi and PHVs because they are more likely to not drive. Changes in provision could have an adverse impact on this group in terms of affordability and accessibility to services, work and social activities.

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	Assessment topic	Impact (+/-)	GM impact magnitude	Rochdale impact magnitude	Impact type*	LA Justification
Socio-economic status	**Accessibility / Affordability**	**-**	**Not assessed for GM**	**Medium / High**	●	People living in deprivation, on low incomes and in receipt of benefits are more likely to be disproportionately impacted by the implementation of the GM Clean Air Zone: - due to the potential for increased costs for bus transport being passed onto customers via rises in passenger fares (as they are more likely to be reliant on public transport) - due to an increase in business costs (particularly for PHV and Hackney drivers, and SME's / sole traders operating LGVs) due to the implementation of charges

*differential (x) or disproportionate (•)

8.7 Salford

8.7.1 No differences are identified between the assessment outcomes of the GM and Salford EqIAs. However, the Salford EqIA does note that Salford's ethnic minority groups differ from those in GM, with a higher Yemeni Arab population and smaller groups of Pakistani and Bangladeshi heritage / British Pakistani and British Bangladeshi. However, the taxi workforce includes a high proportion of Pakistani and Bangladeshi and Yemeni individuals, principally men.

8.7.2 Salford has a higher than national average of Jewish people and also Gypsies and Irish Travellers who disproportionately depend on microbusinesses with a vehicle. Members of the traveller community in particular are often digitally excluded and may not engage with the support to access the funds without specific outreach.

8.8 Stockport

8.8.1 No differences were identified between Stockport and GM for baseline data in relation to protected characteristics. Stockport Council does consider socio-economic status within its EqIA process, and the potential impact of GM CAP on Stockport's more socio-economically deprived communities is described in the Stockport's appendix.

8.8.2 No other differences were identified in EqIA outcomes.

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8.9 Tameside

	Assessment topic	Impact (+/-)	GM impact magnitude	Tameside impact magnitude	Impact type*	LA Justification
Carers	**Accessibility**	**-**	**Not assessed for GM**	**Low**	●	Impact on carers is closely aligned to the impact on people with disabilities. Carers are more likely to rely on public transport in their role as a Carer. Impact in line with GM assessment for disabled residents.
	Affordability	**-**	**Not assessed for GM**	**Low**	●	Impact on carers is closely aligned to the impact on people with disabilities. Impact in line with GM assessment for disabled residents.

*differential (x) or disproportionate (•)

8.10 Trafford

8.10.1 No specific differences were identified between Trafford and GM for baseline data related to protected characteristics. With regards to EqIA outcomes, differences to the GM EqIA are highlighted below:

	Assessment topic	Impact (+/-)	GM impact magnitude	Trafford impact magnitude	Impact type*	LA Justification
Gender reassign -ment	**Accessibility**	**-**	**Medium**	**Low**	●	Trafford do not have data to assign magnitude of impact

*differential (x) or disproportionate (•)

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8.11 Wigan

	Assessment topic	Impact (+/-)	GM impact magnitude	Wigan impact magnitude	Impact type*	LA Justification
Carers	Air quality	No equality impact				
	Accessibility	-	Not assessed for GM	Low	●	Carers are more likely to be accompanying a disabled person and rely on taxis or PHVs. Any decrease in volume of service due to the increased costs of the CAZ would disproportionately affect this group.
	Affordability	-	Not assessed for GM	Low	●	Carers may be more likely to be in lower income roles or be receiving benefits, due to their caring commitments, and therefore maybe more reliant on taxis and public transport so they may be disproportionately affected by any increases in the cost of taxis/PHVs and public transport.
Armed forces	Air quality	+	Not assessed for GM	Medium	●	The highest percentages of veterans are over 65 years of age and are male. A quarter of all aged over 75 are classed as veterans. This percentage of the population may be more likely to have a disability or experience ill health, therefore any benefits to air quality will positively impact this group.
	Accessibility	-	Not assessed for GM	Low	●	According to conclusions drawn from the 2011 census, over half of all veterans in Wigan Borough are over 65 and are entitled to free public transport. Any impacts in services would disproportionately affect this group.
	Affordability	-	Not assessed for GM	Low	●	Due to the characteristics of this group, veterans are more likely to be elderly or experience disability and utilise PHVs/Taxis as a means of transport. Any increase in cost due to the cost of compliance with the CAZ being passed on, would disproportionately negatively impact veterans

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Socio-economic	**Air quality**	**+**	**Not assessed for GM**	**High**	●	Those persons who are from lower socioeconomic backgrounds are more likely to live in areas with poor air quality and are therefore disproportionately affected by poor air quality. Any perceived improvements in air quality will result in improved health outcomes and will have beneficial differential impact on this group.
	Accessibility	**-**	**Not assessed for GM**	**Low**	●	Persons from a lower socioeconomic background are more likely to rely on public transport and taxis/PHVs. Any decrease in service would be likely to adversely impact this group.
	Affordability	**-**	**Not assessed for GM**	**Medium**	●	Any price rises from public transport or PHV/Taxi compliance that increase fares will differentially impact those persons from lower socioeconomic backgrounds.

*differential (x) or disproportionate (•)

9 Next steps

9.1.1 The following actions have been put in place to ensure that equality impacts continue to be considered and monitored during the 'prepare to operate' and operational stages of the GM CAP.

9.2 Actions to further mitigate residual negative equality impacts

9.2.1 There is already a significant package of measures within the GM CAP Policy to mitigate the potential unintended impacts of the charging CAZ, strengthened in response to the consultation feedback. Ensuring an understanding of and accessibility to these measures by those with protected characteristics is key to take up and to mitigating equality impacts.

Access to funds and vehicle finance

9.2.2 The funds and vehicle finance packages play a crucial role in mitigating the affordability and accessibility impacts highlighted in this assessment. The Vehicle Finance and Funds projects continue to develop their approach to the accessibility of the offer. It is important that the following continue to be considered during the Prepare to Operate phase:

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- **Digital exclusion:** Digital channels are to be the principle routes to access information and applications to the Funds and Vehicle Finance packages. The EqIA has highlighted that some protected characteristic groups impacted by the CAZ, such as minority ethnic and faith groups are more likely to live in more deprived neighbourhoods and the assessment also highlighted that older drivers could be impacted disproportionately. In both cases, digital exclusion due to lack of suitable devices or connectivity could be a barrier to accessing the funds, with alternative routes or more support made available to support those that need it.

- **Language and communication barriers:** Some of the impacted groups, such as minority ethnic and faith groups and also those with some disabilities may require additional support to access the information and application processes successfully. This support could take the form of translation of materials and / or more accessible formats of documents. The Vehicle Finance and Funds project teams are already considering these requirements. A review of the final design against the EqIA will be important.

- **Channels of communication:** Some of the protected characteristic groups impacted by the CAZ, particularly ethnic minority and faith groups may be more likely to trust local and informal, peer-to-peer channels of communication. It is important that these local networks are utilised as much as possible to encourage consideration and take-up of the available, mitigating measures.

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Monitoring of potential equality impacts at GM level

9.2.3 There is a Monitoring and Evaluation Plan which will form an annex to the FBC for the GM CAP. Responsibility for monitoring the impacts on protected characteristic groups highlighted in this assessment, will sit within the Monitoring and Evaluation (M & E) Plan. An initial review of the Logic Map within the M & E Plan has been undertaken to assess how the outcome monitoring in the plan will help to monitor the air quality, accessibility and affordability indicators in this assessment. This is an ongoing piece of work that will develop further during the Prepare to Operate phase but further monitoring systems, such as specific focus groups may need to be built into the plan to enable the monitoring of outcomes at protected characteristics group level.

9.2.4 Given the removal of the Hardship Fund from the package of measures and the inclusion of socio-economic deprivation / low income as a characteristic within most of the ten local authority equality assessments, it will be particularly important to monitor the impact of the CAZ on economically vulnerable individuals and businesses.

9.2.5 The following actions have been discussed with the GM CAP EqIA Local Authority working group to inform the monitoring of impacts on protected characteristics during the operational phase. They are subject to agreement with the CAP programme and local authorities.

- **Local authority group to input into the Monitoring and Evaluation Plan:** In order to share any insights from the M & E Plan in terms of impacts on protected characteristics, and in order for local authorities to be able to feed in local intelligence or issues into the process, it is recommended that the Local Authority EqIA Working Group is continued, meeting at least every six months with the M&E team.

- **Review of the EqIA in one year**: There are two main drivers to support the need for a review of this assessment in one year:

    a) It has been highlighted that certain protected characteristics are more vulnerable and less resilient to the negative economic impacts of the CAZ as a result of the COVID-19 pandemic. A review of the EqIA should be undertaken when the scale and speed of recovery during 2021 can be taken into consideration.

    b) The census data used to inform this EqIA and the ten LA appendices is from 2011, with data from the 2021 census due for release in 2022. A review of changes in the demographic data by local authority is recommended to ensure that any notable changes in protected characteristics are considered.

9.2.6 The ten local authority appendices provide further detail on any specific monitoring and review processes that will be put in place to monitor the equality impacts of the GM CAP at a local level.

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Appendix A: Greater Manchester Community Baseline

1 Baseline data

1.1 Introduction

1.1.1 The baseline presented covers the Greater Manchester area which includes ten Metropolitan Districts. Data presented considers a range of social and economic aspects that can be used to make assumptions about the prevalence of protected characteristic groups throughout the study area who may be affected by the GM CAP. Current and, where possible, predicted future baseline is presented.

1.1.2 Baseline data has been collated across a range of sources to provide an overview of the characteristics of the equality groups. These include:

- ONS, 2011 Census
- ONS, 2018 population projections
- Working and Pensions Longitudinal Study, 2016
- Policy review of local strategies
- Department for Transport, 2016
- These sources have been supplemented by 'grey' literature and desk-based research, to reflect equalities indicators that are not recorded in national data collection.

1.1.3 Specifically, the following is covered:

- Population and demographics
- Housing
- Economy
- Employment
- Health
- Social infrastructure
- Deprivation

1.2 Current population and trends

1.2.1 The population of GM increased by 11.2% (284,300) between 2003 and 2018; by comparison the North West's population increased by 7.3% and the population of England increased by 12.3%. Table 2 shows the population changes for GM and each district between 2003 and 2018; Manchester is the largest district and has experienced the highest level of population increase (26.6%).

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Table 2: Population Change 2003 – 2018 (Source: ONS 2018 Population Estimates[47])

	Population		Population Change	
	2003	**2018**	**Number**	**Percentage**
England	49,863,300	55,977,200	6,113,900	12.3%
North West	6,798,900	7,292,100	493,200	7.3%
Greater Manchester	2,528,300	2,812,600	284,300	11.2%
Bolton	262,700	284,400	21,700	8.3%
Bury	181,500	190,100	8,600	4.7%
Manchester	432,400	547,600	115,200	26.6%
Oldham	217,300	235,600	18,300	8.4%
Rochdale	206,300	220,000	13,700	6.6%
Salford	217,300	254,400	37,100	17.1%
Stockport	283,500	291,800	8,300	2.9%
Tameside	213,200	225,200	12,000	5.6%
Trafford	211,300	236,400	25,100	11.9%
Wigan	302,400	326,100	23,700	7.8%

1.1.4 Population forecasts from 2018 to 2038 (20 years) are shown in **Table 3**. It is estimated that the population for England will increase to over 61 million by 2038 from just below 56 million in 2018[48]. The population of the North West is due to rise to 7.6 million from 7.3 million in 2018. The population of GM is forecast to increase by approximately 226,000 to over 3 million over this period. The district with the highest population change is Manchester (13.9%) followed by Salford (13.3%) and Trafford (10.6%). The local authority with the lowest population change is Wigan (2.4%) which is below the national and regional average.

Table 3: Population Forecasts 2018 – 2038 (Source: ONS Subnational Population Projections, 2016-based projections[48])

	Population		Population Change	
	2018	**2038**	**Number**	**Percentage**
England	55,977,200	61,326,378	5,349,178	9.6
North West	7,292,100	7,653,197	361,097	5.0

[47] Nomis (2019). Population estimates – local authority based by five-year age band. Available at: https://www.nomisweb.co.uk/reports/lmp/gor/2013265922/report.aspx

[48] ONS (2019) Subnational Population Projections, 2016-based projections. Available at: https://www.nomisweb.co.uk/query/construct/submit.asp?menuopt=201&subcomp=

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	Population		Population Change	
	2018	2038	Number	Percentage
Greater Manchester	2,812,600	3,038,511	225,911	8.0
Bolton	284,400	299,808	15,408	5.4
Bury	190,100	198,575	8,475	4.5
Manchester	547,600	623,806	76,206	13.9
Oldham	235,600	252,905	17,305	7.3
Rochdale	220,000	228,980	8,980	4.1
Salford	254,400	288,221	33,821	13.3
Stockport	291,800	316,306	24,506	8.4
Tameside	225,200	234,678	9,478	4.2
Trafford	236,400	261,386	24,986	10.6
Wigan	326,100	333,846	7,746	2.4

1.3 Sex

1.3.1 The population of the districts within GM is split more of less evenly between male and females, with slightly more females in all districts, except for Manchester and Salford (see Table 4). Across GM, the split between the sexes is reflective of the statistic across the whole of England and the North West.

Table 4 Resident population distribution between male and female, 2018[49]

	Population (%)	
	Male	Female
England	49.43	50.57
North West	49.35	50.65
Greater Manchester	49.68	50.32
Bolton	49.61	50.39
Bury	49.03	50.97
Manchester	50.68	49.34
Oldham	49.28	50.72
Rochdale	49.36	50.64
Salford	50.47	49.53
Stockport	49.01	50.99

[49] ONS Area profiles, 2018. Available at: https://www.nomisweb.co.uk/home/profiles.asp

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	Population (%)	
	Male	**Female**
Tameside	49.16	50.84
Trafford	48.90	51.10
Wigan	49.86	50.14

1.4 Households

1.4.1 Table 5 shows the numbers of households across GM, with a series of larger scale geographic comparator areas also shown. There has been an increase in households from 2004 to 2014[50] across GM of 6.4% compared to 9% nationally.

1.4.2 Manchester experienced the highest level of household growth (11.7%) compared to other GM local authority areas, followed by Salford (10.3%) and Wigan (7%). Stockport and Oldham experienced the lowest amount of household growth (2.2%) in comparison with other local authority areas.

Table 5: Change in quantity of households across a number of comparator areas (Source: ONS 2014 Live tables on household projections 2014[50])

	Households		Household Change	
	2004	**2014**	**Number**	**Percentage**
England	20,876,084	22,746,487	1,870,403	9.0
Greater Manchester	1,069,667	1,138,000	68,333	6.4
Bolton	110,311	117,000	6,689	6.1
Bury	75,367	79,000	3,633	4.8
Manchester	186,272	208,000	21,728	11.7
Oldham	88,021	90,000	1,979	2.2
Rochdale	84,547	88,000	3,453	4.1
Salford	95,173	105,000	9,827	10.3
Stockport	120,336	123,000	2,664	2.2
Tameside	90,864	96,000	5,136	5.7
Trafford	90,743	95,000	4,257	4.7
Wigan	128,033	137,000	8,967	7.0

[50] DCLG (2016) Live tables on household projections 2014. Available at: https://www.gov.uk/government/statistical-data-sets/live-tables-on-household-projections

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1.4.3 Twenty year projections for household change show an increase in households at each level[50] in Table 6; the district with the highest increase in households from 2014 to 2034 is Salford (27.5%). Manchester also has a high percentage increase in households (26.6%), as does Trafford (23.8%). The district with the lowest percentage of household change is Rochdale (11.5%). There is predicted to be an increase of 207,311 households by 2034 which equates to 10,365 households per annum.

Table 6: Household Forecast 2014 – 2034 (Source: ONS Live tables on household projections 2014[50])

	Households		Household Change	
	2014	**2034**	**Number**	**Percentage**
England	22,746,487	27,088,386	4,341,899	19.1
Greater Manchester	1,138,000	1,345,311	207,311	18.2
Bolton	117,000	132,418	15,418	13.2
Bury	79,000	89,744	10,744	13.6
Manchester	208,000	263,324	55,324	26.6
Oldham	90,000	104,648	14,648	16.3
Rochdale	88,000	98,115	10,115	11.5
Salford	105,000	133,851	28,851	27.5
Stockport	123,000	141,668	18,668	15.2
Tameside	96,000	107,930	11,930	12.4
Trafford	95,000	117,567	22,567	23.8
Wigan	137,000	156,046	19,046	13.9

1.5 Demographics

Age

1.5.1 Figure 1 shows the relative proportions of different age groups in 2018, from a national to a local level. In comparison with the average for England, GM has a similar proportion of the population aged 16-64 with approximately 63% of the population accounting within this age group[51].

[51] **ONS (2018) Population Estimates for England and Wales Mid-2018. Available at: https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/datasets/populationestimatesforukenglandandwalesscotlandandnorthernireland**

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1.5.2 In comparison to other local authorities in the conurbation, Manchester has the highest percentage of residents aged 16-64 (70.4%) and a lower percentage of the population aged 65 and over (9.3%). Conversely, Stockport has the highest percentage of residents aged 65 and over (19.9%) and the lowest proportion of residents aged 16-64 (60.6%).

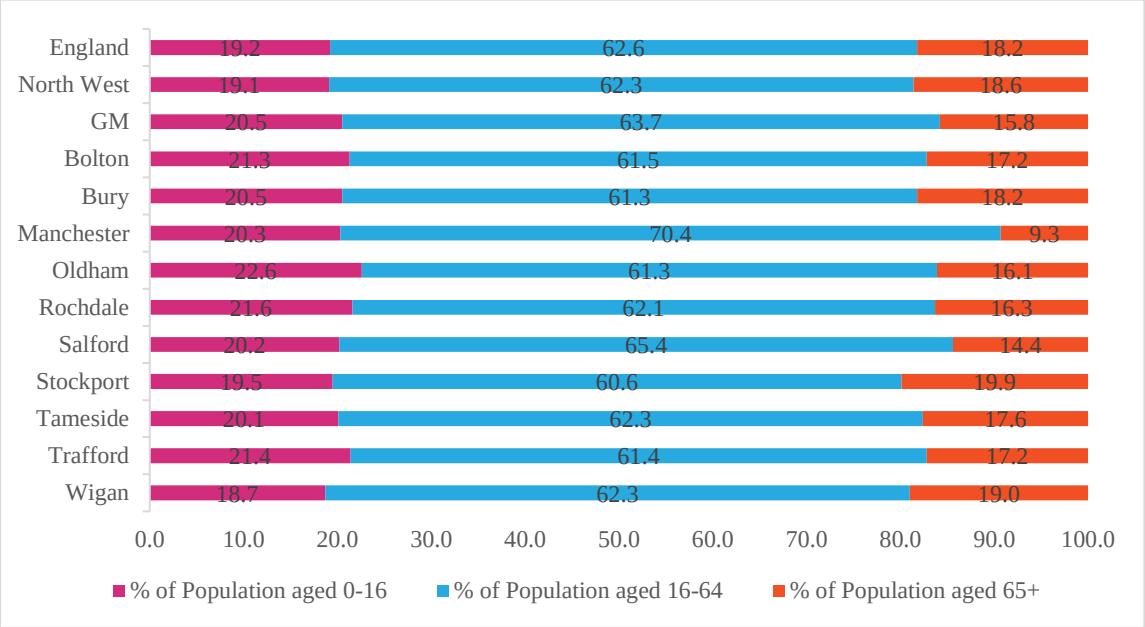
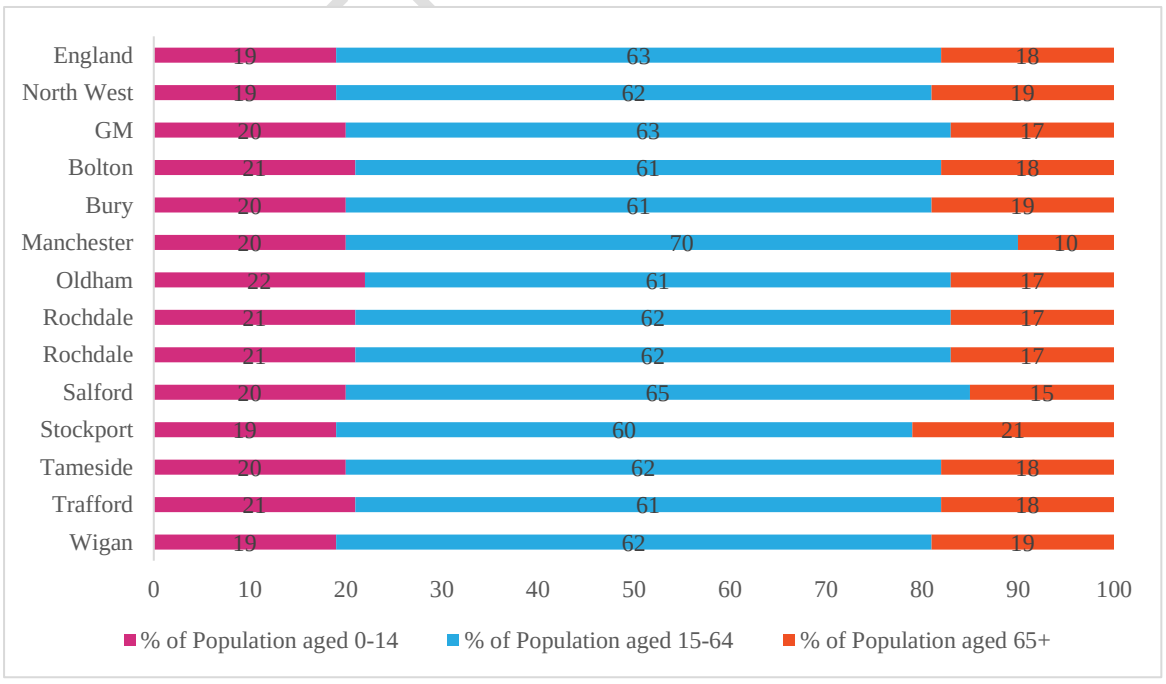


Figure 1: A snap-shot of age demographics across GM (Source: ONS 2018 Population Estimates for England and Wales Mid-2018[51])

1.5.3

1.5.4 Figure **2** shows the demographic projections to 2041. In terms of future



trends, the age categories appear to be very similar to existing projections with no marked change in age percentages.

Figure 2: Demographic Projections 2041 (Source: ONS 2016 Subnational Population Projections, 2016-based projections[51])

1.5.5 Table 7 sets out the life expectancy within each district between 2015-17, demonstrating that female life expectancy is consistently above male life expectancy.

1.5.6 The authorities with the highest life expectancy at birth are Trafford (83.7 years for females; 79.8 for males) and Stockport (83.3 years for females; 79.8 for males), which are above the national, regional and sub-regional averages. The local authorities with the lowest life expectancy are Manchester (79.5 years for females; 75.7 years for males) and Rochdale (80.6 years for females; 77.2 for males)

Table 7: Male and Female life expectancy at birth and at age 65 (2015-17) [52]

	Life expectancy at birth 2015-17		Life expectancy at age 65	
	Males	**Females**	**Males**	**Females**
England	79.6	82.9	18.6	21.1
North West	78.2	81.8	18	20.2
Greater Manchester	77.8	81.3	17.6	19.8
Bolton	77.8	81.6	17.9	20.0
Bury	78.5	81.2	17.8	19.7
Manchester	75.7	79.5	16.1	18.7
Oldham	77.2	80.9	17.2	19.6
Rochdale	77.2	80.6	17.5	19.7
Salford	76.8	81.0	17.3	19.3
Stockport	79.8	83.3	19.1	21.2
Tameside	77.5	80.8	17.0	19.3
Trafford	79.8	83.7	18.7	21.5
Wigan	77.8	80.9	17.6	19.4

[52] ONS (2018) Life expectancy at birth and at age 65 by Local Areas, UK, 2015-2017. Available at https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/healthandlifeexpectancies/datasets/lifeexpectancyatbirthandatage65bylocalareasuk

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1.6 Disability

1.6.1 Table 8 shows the IMD 2019 ranks for health and disability. The lower the number (out of 151 upper-tier local authorities in England), the more deprived the area. The health and disability domain measures premature death and impairment of quality of life by poor health. Indicators that are used to calculate this domain include:

- years of potential life lost;
- comparative illness and disability ratio; and,
- measures of acute morbidity and proportion of adults under 60 suffering from mood and anxiety disorders.

1.6.2 Manchester has a rank of four which indicates it is amongst the most deprived areas in relation to health and disability compared to other local authorities in England. Trafford is the least deprived in GM with a rank of 88 although this is still relatively deprived in comparison to other local authorities in England.

Table 8: IMD 2019 Health deprivation and disability domain (rank of average rank) [53]**.**

Local Authority	Rank
Trafford	88
Bury	57
Stockport	55
Bolton	36
Wigan	33
Oldham	31
Rochdale	14
Tameside	12
Salford	9
Manchester	4

1.6.3 The 2011 census collected self-reported data on the percentage of people whose day to day activities are limited as a result of disability. Table 9 shows that 9.8% of the resident population with GM are limited a lot by a disability. This is above the England average of 8.3% but a little less than the average across the North West (10.3%).

[53] English indices of deprivation 2019, File 11: Upper-tier local authority summaries. Available at: https://www.gov.uk/government/statistics/english-indices-of-deprivation-2019

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Table 9 Long-term health problem or disability as a percentage of the resident population (Census, 2011).

	Day-to-day activities limited a lot (%)	Day-to-day activities limited a little (%)
England	8.3	9.3
North West	10.3	10
GM	9.8	9.7
Bolton	10	9.8
Bury	9	9.8
Manchester	9.4	8.3
Oldham	10	9.7
Rochdale	10.7	10.3
Salford	11	9.7
Stockport	8.6	9.8
Tameside	10.6	10.3
Trafford	8	9
Wigan	11	10.5

1.6.4 This data is available by age group which can be used to identify the age groups most affected by health conditions and disability; Table 10 sets out this distribution. Within GM (and within each district) the age bracket 45-69 experience the greatest proportion of residents with a disability or long-term health condition (4.09% of total resident population). The national distribution across the age brackets is similar although the proportion of residents with GM is slightly higher in all ages, except for 85+.

Table 10 Long-term health problem or disability for persons whose day to day activities are limited a lot, by age bracket, as a percentage of the resident population (Census, 2011)

	Age bracket					
	0-14	**15-24**	**25-44**	**45-69**	**70-84**	**85+**
England	0.2	0.28	1.07	3.37	2.64	1.34
GM	0.31	0.31	1.33	4.09	2.68	1.13
Bolton	0.31	0.32	1.33	4.15	2.77	1.16
Bury	0.29	0.29	1.14	3.63	2.55	1.14
Manchester	0.35	0.36	1.67	4.11	2.12	0.79
Oldham	0.41	0.30	1.37	4.15	2.63	1.15
Rochdale	0.33	0.34	1.56	4.64	2.77	1.05
Salford	0.33	0.34	1.55	4.63	2.93	1.20

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	Age bracket					
Stockport	0.28	0.28	0.99	3.16	2.60	1.33
Tameside	0.28	0.32	1.45	4.56	2.85	1.16
Trafford	0.25	0.23	0.92	3.07	2.34	1.22
Wigan	0.25	0.28	1.33	4.79	3.22	1.09

1.7 Benefit claimants

1.7.1 Disability living allowance (DLA) was money that is paid to people who have extra care needs or mobility needs as a result of a disability. This has now been replaced by Personal Independence Payment (PIP) but statistics up to 2018 relate to DLA.

1.7.2 These data are set out in **Table 11** which shows that the proportion of claimants across GM (3.12%) is higher than the England average (2.55%) but slightly below the North West average (3.28%). Of all the districts, Rochdale had the highest proportion of claimants (3.66%) whilst Trafford had the lowest (2.33%).

Table 11 Disability Living Allowance (DLA) claimants (ONS, 2018) [54]

	Total claimants	% of population within district
England	1,425,330	2.55
North West	239,090	3.28
Greater Manchester	2,770	3.12
Bolton	8,450	2.97
Bury	5,510	2.90
Manchester	15,910	2.91
Oldham	8,000	3.40
Rochdale	8,050	3.66
Salford	9,140	3.59
Stockport	8,410	2.88
Tameside	7,960	3.53
Trafford	5,510	2.33
Wigan	10,910	3.35

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[54] ONS, 2018. Benefit Claimants – disability living allowance. Available at: https://www.nomisweb.co.uk/query/construct/submit.asp?menuopt=201&subcomp=

1.8 Blue badge holders

1.8.1 Statistics are available on the number of Blue Badge holders, which can be used to indicate the number of disabled residents at a local authority level. The number of valid Blue Badges held by individuals within GM is set out in Table 12. Wigan has the highest proportion (2.1%) whilst Manchester has the lowest proportion (1%).

Table 12 Blue Badge Holder (2017/2018), Department for Transport[55]

	Number of Blue Badges	% of population within district
Bolton	5,142	1.8
Bury	3,713	1.6
Manchester	5,700	1.0
Oldham	3,449	1.5
Rochdale	4,033	1.8
Salford	4,189	1.7
Stockport	4,893	1.7
Tameside	3,457	1.5
Trafford	3,707	1.6
Wigan	6,963	2.1

1.9 Gender reassignment

1.9.1 There are multiple definitions of transgender. For the purposes of this report, following the approach taken by the Office for National Statistics, the common umbrella term 'trans' is used to refer to people whose lived identities conflict with societal gender norms. This encompasses a range of identifies ranging from those who cross-dress to those people who identify their own gender differently to that assigned to them at birth. It also includes individuals who identify as androgynous, non-gendered or non-binary. Importantly, it is not limited to people who have undergone gender reassignment surgery.

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[55] Department for Transport, 2018. Blue badge scheme statistics:2018. Available at: https://www.gov.uk/government/statistics/blue-badge-scheme-statistics-2018

1.9.2 No data sets are available to allow the identification of the proportion of trans people in the population for the purposes of this EqIA. No major Government or administrative surveys have collected data that includes a question where trans, people can choose to identify themselves. Publicly collected data on trans people is "virtually non-existent" [56]. One source, collected by the Gender Identity Research and Education Society (GIRES) for the Home Office in 2009, identified between 300,000 and 500,000 people in the UK with some degree of gender variance. This represents some 0.4% to 0.8% of the UK population.

1.9.3 There is no evidence on the spatial distribution of trans people around the UK but applying those figures to known population figures across GM suggests there could be somewhere in the region of 11,250 to 22,500 people with some degree of gender variance (out of a total population of 2,812,600). These figures should be regarded as illustrative.

1.10 Marriage and civil partnership

1.10.1 Across GM, for ages 16 and over, a person is more likely to be married (42.6%) than single (defined as having never married or never registered a same-sex civil partnership) (38.4%). However, statistics available do not show what proportion of the resident population who are defined as single are actually in a relationship. Table 13 sets out the marital and civil partnership status of the population across GM and within each of the districts.

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Table 13 Marital and civil partnership status, 2011 [57] (% of residents)

	Single (never married or never registered a same-sex civil partnership)	Married	In a registered same-sex civil partnership	Separated (but still legally married or still legally in a same-sex civil partnership	Divorced or formerly in a same-sex civil partnership which is now legally dissolved	Widowed or surviving partner from a same-sex civil partnership
England	34.6	46.6	0.2	2.7	9.0	6.9
GM	38.4	42.6	0.2	2.9	9.0	6.9
Bolton	33.6	46.5	0.2	2.8	9.6	7.3
Bury	32.9	47.4	0.2	2.9	9.5	7.1
Manchester	54.9	29.4	0.3	3.2	7.1	5.1
Oldham	33.1	46.6	0.1	3.3	9.1	7.8

[56] Equalities & Human Rights Commission, 'Trans Inequalities Reviewed'. Available at: https://www.equalityhumanrights.com/en/trans-inequalities-reviewed/introduction-review

[57] ONS Census 2011. KS103EW- Marital and Civil Partnership Status, 2011. Available at: https://www.nomisweb.co.uk/query/construct/submit.asp?menuopt=201&subcomp=

Rochdale	35.1	44.2	0.2	3.4	9.7	7.3
Salford	43.4	37.0	0.3	3.1	9.1	7.0
Stockport	32.2	48.3	0.2	2.5	9.2	7.7
Tameside	35.3	43.5	0.2	3.0	10.4	7.6
Trafford	33.2	48.6	0.2	2.4	8.5	7.1
Wigan	32.9	47.4	0.2	2.5	9.9	7.2

1.11 Pregnancy and maternity

1.11.1 Data available from ONS provides details of live births for 2018. This therefore does not capture the total number of pregnancies which may not end in a live birth (either as a result of termination or miscarriage). Whilst not all births will be single, an assumption has been made that they are, in order to obtain a percentage of females within the population who were pregnant during 2018.

Table 14 Live births across Greater Manchester (ONS, 2018) [58]

	Number of live births	**% of female population within defined area**
England	**625,651**	**2.21**
North West	**81,195**	**2.20**
GM	**34,776**	**2.46**
Bolton	**3,607**	**2.51**
Bury	**2,219**	**2.29**
Manchester	**7,237**	**2.68**
Oldham	**3,187**	**2.67**
Rochdale	**2,832**	**2.54**
Salford	**3,553**	**2.82**
Stockport	**3,302**	**2.22**
Tameside	**2,784**	**2.43**
Trafford	**2,641**	**2.19**
Wigan	**3,414**	**2.09**

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58 ONS (2018) Live births in England and Wales down to local authority local area. Available at: https://www.nomisweb.co.uk/query

1.12 Ethnicity/Race

1.12.1 ONS Census data[59] show that there is significant variation in ethnic groups across GM's districts (see Table 15). The majority of the GM population is white, although compared to England and Wales as a whole this percentage is slightly lower. The proportion of people classified as Asian in GM is higher than the national average, whilst there are fewer people classified as Black than in England and Wales as a whole.

Table 15: Ethnic groups across GM (Source: ONS 2011[59])

	England and Wales	Greater Manchester	Bolton	Bury	Manchester	Oldham	Rochdale	Salford	Stockport	Tameside	Trafford	Wigan
White	85.9%	83.7 %	81.8 %	89.1 %	66.5 %	77.5 %	81.6 %	90.1 %	92.1 %	90.9 %	85.5 %	97.2 %
Gypsy/ Traveller	0.1%	0.1%	0.1%	0.0%	0.1%	0.0%	0.1%	0.1%	0.0%	0.0%	0.0%	0.0%
Mixed / Multiple Ethnic Groups	2.2%	2.3%	1.8%	1.8%	4.6%	1.8%	1.7%	2.0%	1.8%	1.4%	2.7%	0.9%
Asian / Asian British\ Indian	2.5%	2.0%	7.8%	0.7%	2.3%	0.7%	0.5%	1.1%	1.0%	1.7%	2.8%	0.3%
Asian / Asian British\ Pakistani	2.0%	4.8%	4.3%	4.9%	8.5%	10.1 %	10.5 %	0.8%	2.4%	2.2%	3.1%	0.2%
Asian British\ Bangladeshi	0.8%	1.3%	0.2%	0.2%	1.3%	7.3%	2.1%	0.3%	0.2%	2.0%	0.2%	0.0%
Asian / Asian British\ Chinese	0.7%	1.0%	0.5%	0.6%	2.7%	0.3%	0.4%	1.1%	0.6%	0.4%	1.0%	0.3%
Asian / Asian British\ Other Asian	1.5%	1.1%	1.1%	0.9%	2.3%	0.8%	1.4%	0.8%	0.7%	0.3%	0.9%	0.3%
Black / African / Caribbean / Black British	3.3%	2.8%	1.7%	1.0%	8.6%	1.2%	1.3%	2.8%	0.7%	0.8%	2.9%	0.5%
Other ethnic group	1.0%	1.0%	0.7%	0.7%	3.1%	0.2%	0.4%	1.1%	0.6%	0.2%	1.0%	0.2%

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[59] ONS (2011) Census data by local authority: ethnic groups UK. Available at: http://infuse2011.mimas.ac.uk/

1.13 Religious belief

1.13.1 ONS Census data[60] show that there is significant variation in religion and beliefs across GM's districts (see Table 16). The majority of the GM population is Christian, with a slightly higher proportion than England and Wales as a whole. The proportion of Muslim and Jewish People in GM is considerably higher than the national average whilst there are fewer people in GM reporting no belief than the national average.

Table 16: religion or belief across GM (Source: ONS 2011[60])

	England and Wales	Greater Manchest	Bolton	Bury	Manchester	Oldham	Rochdale	Salford	Stockport	Tameside	Trafford	Wigan
Christian	59.3%	61.8 %	62.7 %	62.7 %	48.7 %	59.7 %	60.6 %	64.2 %	63.2 %	64.0 %	63.4 %	77.8 %
Buddhist	0.4%	0.4%	0.2%	0.2%	0.8%	0.2%	0.2%	0.4%	0.3%	0.2%	0.3%	0.2%
Hindu	1.5%	0.9%	2.2%	0.4%	1.1%	0.5%	0.3%	0.6%	0.6%	1.5%	1.0%	0.2%
Jewish	0.5%	0.9%	0.1%	5.6%	0.5%	0.0%	0.1%	3.3%	0.5%	0.0%	1.1%	0.0%
Muslim	4.8%	8.7%	11.7 %	6.1%	15.8 %	17.7 %	13.9 %	2.6%	3.3%	4.4%	5.7%	0.7%
Sikh	0.8%	0.2%	0.0%	0.2%	0.5%	0.0%	0.0%	0.1%	0.1%	0.0%	0.7%	0.0%
Other religion	0.4%	0.3%	0.3%	0.2%	0.4%	0.2%	0.2%	0.3%	0.3%	0.3%	0.2%	0.2%
No religion	25.1%	20.8 %	17.2 %	18.6 %	25.3 %	16.1 %	18.9 %	22.3 %	25.1 %	23.6 %	21.2 %	15.3 %
Not stated	7.2%	6.1%	5.7%	6.0%	6.9%	5.6%	5.8%	6.2%	6.5%	5.9%	6.3%	5.5%

1.14 Sexual orientation

1.14.1 Information on sexual orientation is available through the Office of National Statistics. Statistics related to sexual orientation have not been collected for very long and are therefore experimental statistics which means that they are being developed and currently in the testing phase.

1.14.2 Figure **3** shows the proportion of gay, lesbian and bisexual residents, across different spatial scales. The North West of England has a lower proportion of LGB residents (1.29%) compared to London (2.6%) and the south West (2.4%).

1.14.3 The ONS survey identified that in 2017 a higher proportion of men (1.7%) than women (0.9%) identify as gay or lesbian, whilst a higher proportion of women (0.9%) identify as bisexual than men (0.6%).

[60] ONS (2011) Census data by local authority: religion or belief. Available at: http://infuse2011.mimas.ac.uk/

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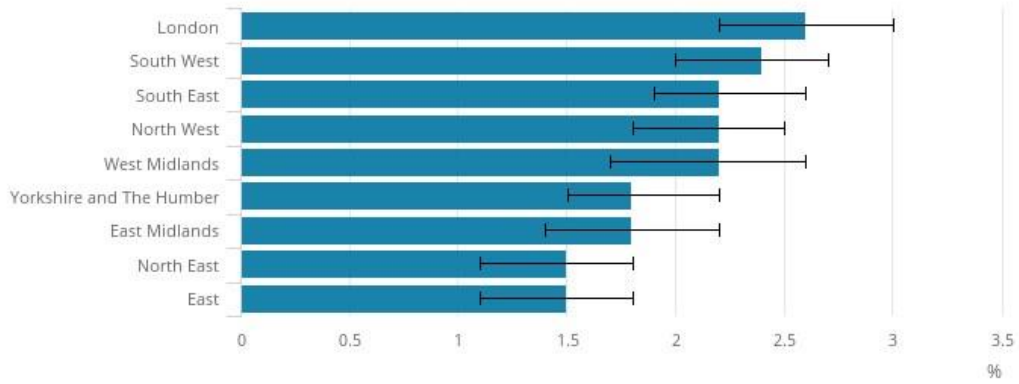
1.14.4 Younger people are more likely to identify as lesbian, gay or bisexual than any other age group with 4.2% of 16-24 year olds identifying as LGB in 2017 in the UK.

1.14.5 Both these data (by age and gender) are not available at a more local scale, but it is assumed that this is likely to be reflected in all areas.

Figure 3 English Regions by lesbian, gay or bisexual population, 2017 (Source: Office for National Statistics – Annual Population Survey)



1.15 Indices of Multiple Deprivation

1.15.1 The most recent ONS data[61] on local authority income deprivation was published in September 2019 and 317 local authorities were surveyed. Greater Manchester has been ranked against the 38 Local Enterprise Partnerships in England.

1.15.2 The index of multiple deprivation is made up of 7 sub-domains, each given a weighting depending on how much they contribute to deprivation. The factors and weightings are listed below:

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[61] ONS (2019) English indices of deprivation 2019 - local authority district summaries. Available at: https://www.gov.uk/government/statistics/english-indices-of-deprivation-2019

- Income Deprivation (22.5%)
- Employment Deprivation (22.5%)
- Education, Skills and Training Deprivation (13.5%)
- Health Deprivation and Disability (13.5%)
- Crime (9.3%)
- Barriers to Housing and Services (9.3%)
- Living Environment
- Deprivation (9.3%)

1.15.3 Local authority's ranks are calculated by averaging all the LSOA ranks in an authority after they have been population weighted. A rank of 1 indicates the most deprived authority. Using ranks of average ranks means that a highly polarised larger area would not tend to score highly, because extremely deprived and less deprived LSOAs will 'average out'. Conversely, a larger area that is more uniformly deprived will tend to score highly on the measure.

1.15.4 The rank of proportion of LSOAs in the most deprived 10% score is the proportion of the authority's LSOAs that fall in the most deprived 10% of LSOAs nationally. Contrast to the average rank and average score measures, this measure focuses only on the most deprived LSOAs. The rank of extent describes the proportion of the population in the most deprived 30% of all LSOAs. Like the previous measure, this measure accounts for a larger percentage of deprived areas. The rank of income scale is a measure that ranks an authority by the absolute number of people living in income deprivation in that authority.

1.15.5 Manchester ranks as one of the most deprived authorities in England, with the 2nd highest average rank and proportion of people living in the top 30% of deprived areas nationally. Manchester ranks comparatively higher than any other authority in Greater Manchester, with Oldham reaching the second highest rank of 16th for LSOAs in the most deprived 10%.

1.15.6 In contrast, Trafford and Stockport are far lower down the rankings, hovering around mid-table for local authorities nationally. Greater Manchester is in the top 4 most deprived LEPs for all measures analysed.

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Table 17 English local authority IMD scores Source: (ONS, 2019)

	Rank of average rank	Rank of average score	Rank of proportion of LSOAs in most deprived 10% nationally	Rank of extent
Greater Manchester LEP rank	3	4	4	4
Bolton	47	34	31	26
Bury	110	95	82	85
Manchester	2	6	5	2
Oldham	29	19	16	18
Rochdale	17	15	20	19
Salford	20	18	19	21
Stockport	154	130	90	117
Tameside	23	28	40	28
Trafford	209	191	125	150
Wigan	97	75	53	54

1.16 Income deprivation

1.16.1 Within Greater Manchester, Manchester exhibits the highest levels of deprivation according to its national rank, ranking in the top 10 nationally for Rank of Average Score, Proportion of LSOA's in the most deprived 10% and Income Scale. Rochdale ranks 2nd highest in Greater Manchester suggesting that Oldham experiences other forms of deprivation more prominently than income deprivation. Trafford experiences the least income deprivation.

1.16.2 On average, Greater Manchester has ranked only marginally better in income deprivation when compared to other LEPs, however it still remains in the top 5 for all measures analysed, with the second highest number of people living in income depravity.

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Table 18: English local authority income deprivation Source: (ONS, 2019)

	Income - Rank of average rank	Income – Rank of Average Score	Income – Rank of proportion of LSOAs in most deprived 10% nationally	Rank of Income Scale (ranked by the number of people who are income deprived)
Greater Manchester LEP rank	4	4	5	2
Bolton	44	29	20	24
Bury	97	83	82	87
Manchester	12	8	6	2
Oldham	33	21	23	39
Rochdale	22	15	13	44
Salford	32	24	25	37
Stockport	155	135	95	62
Tameside	34	37	47	52
Trafford	191	166	107	98
Wigan	98	77	62	36

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Appendix B: Health research data on Air Quality

1.1 Outdoor air pollution is defined as a mixture of gases and particles that have been emitted into the atmosphere by man-made processes[62] and has an adverse effect on human health. The World Health Organisation (WHO) recognises outdoor air pollution as a major environmental health problem for all countries including high-income countries[63].

1.2 The primary air pollutants are particulate matter (PM), nitrogen dioxide (NO_2) and Sulphur Dioxide (SO_2). $PM^{2.5}$ has the strongest epidemiological link to health outcomes[64] and it is estimated that by 2035, the health and social care costs of air pollution could reach up to £5.3 billion[65]. This includes diseases that have a strong association with air pollution such as child asthma, coronary heart disease, lung cancer and stroke.

1.3 The WHO estimates that in 2016 some 58% of outdoor air pollution-related premature deaths were due to ischaemic heart disease and strokes, while 18% of deaths were due to chronic obstructive pulmonary disease and acute lower respiratory infections respectively, and 6% of deaths were due to lung cancer. In total, the WHO note that 4.2 million premature deaths per annum occur world-wide due to outdoor air pollution.

1.4 In the UK, the overall population burden of air pollution is estimated to be equivalent to nearly 23,500 deaths per year[66]. Evidence from the WHO, cited in a briefing to Directors of Public Health, identified that there is no "*evidence of a safe level of exposure to PM or a threshold below which no adverse effects occur*" [67]. Equally, NO_2 was associated with "*adverse health effects at concentrations that were at or below the current EU limit values*".

1.5 An evidence and policy review by the UK Health Alliance on Climate Change (2018) notes that transport is a major cause of air pollution. In 2016, emissions from road transport accounted for 12% of PM_{10} and $PM_{2.5}$ in the UK and were the third largest source after industrial processes. Furthermore, road transport is responsible for 80% of NO^2 levels near roadsides.

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[62] Air Quality England. http://www.airqualityengland.co.uk/air-pollution
[63] WHO Topic Sheet. (2018) Ambient (outdoor) air quality and health. https://www.who.int/news-room/fact-sheets/detail/ambient-(outdoor)-air-quality-and-health
[64] Public Health England, Public Health Outcomes, http://www.phoutcomes.info/
[65] UK Health Alliance on Climate Change, (2018). Moving Beyond the Air Quality Crisis. Realising the health benefits of acting on air pollution. http://www.ukhealthalliance.org/wp-content/uploads/2018/10/Moving-beyond-the-Air-Quality-Crisis-4WEB-29_10-2018-final-1.pdf
[66] DEFRA and Public Health England (2017) Air Quality. A briefing for Directors of Public Health. https://laqm.defra.gov.uk/assets/63091defraairqualityguide9web.pdf
[67] Review of evidence on Health Aspects of Air Pollution – REVIHAAP: final Technical Report, World Health Organization Office for Europe, 2013 http://www.euro.who.int/en/health-topics/environment-and-health/air-quality/publications/2013/review-of-evidence-on-health-aspects-of-air-pollution-revihaap-project-final-technical-report

1.6 A systematic review undertaken in 2016 by Wang et al observing air pollution control strategies in Europe, noted that a large proportion of the urban population, particularly those living close of heavily trafficked roads or industries were exposed to air pollutants, with concentrations that exceed the European air quality standards for outdoor air quality[68]. Additionally, the review showed mixed but suggestive evidence of the effectiveness of air quality control strategies to improve health outcomes either directly or as a co-benefit (such as reduction in green-house gases).

1.7 There is a wealth of evidence showing the association of NO_2 and PM on poor health outcomes. Epidemiological studies have shown that long-term exposure to air pollution (over years or a lifetime) reduces life expectancy, due to cardiovascular and respiratory diseases and lung cancer. Short-term exposure (over hours or days) to increased levels of air pollution can also have a range of health effects, including effects on lung function, asthma, as well as increases in respiratory and cardiovascular hospital admissions, and mortality[69]. Additionally, outdoor air pollution can influence productivity and contribute to social costs such as increasing days off work and school due to restricted health[70].

1.8 Public Health England's guidance 'Health matters: air pollution' outlines that whilst air pollution can affect everyone, some people are more affected because they live in a polluted area, are exposed to higher levels of air pollution in their day-to-day lives or are more susceptible to health problems caused by air pollution. Groups that are reported as being more vulnerable to these affects are older people, children (particularly young children), pregnant women, people living with long-term health conditions or disability and those who are living in high pollution areas and low-income communities. In the same way that these groups of people are more sensitive to high levels of air pollution, they are also likely to benefit more from any improvements in air quality.

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[68] Wang et al (2016) Air Quality Strategies on Public Health and Health Equity in Europe – A systematic Review. International Journal of Environmental Research and Public Health

[69] Public Health England 2018. Guidance: Health Matters: air pollution. https://www.gov.uk/government/publications/health-matters-air-pollution/health-matters-air-pollution

[70] IOM Working for a Healthier Future. Scotland's Environment (2015) Air Quality, Health, Wellbeing and Behaviour, https://www.environment.gov.scot/media/1133/iom-seweb-aq-health-behaviour-review.pdf

Appendix C: Data review of Research and Technical Notes

1 Introduction

1.1 This appendix results from a review of six Technical Notes or Research documents generated during the development of the GM CAP measures. The documents have been reviewed for data relevant to impacts on people with protected characteristics, in order to inform the GM CAP Equality Impact Assessment.

1.2 The relevant findings and facts are summarised below, under the name of each report. Key findings are referenced within the EqIA itself.

2 AECOM Impact Assessment Technical Note 3 - GM CAP Freight Market Analysis

2.1 Relevant evidence gathered from Note 3 - GM CAP Freight Market Analysis includes:

2.1.1 There has been a 59% growth in the Light Commercial Vehicle (LCV) sector since 2000, mainly in the 2.6 to 3.5 tonne market. This demand for larger vans is driven by increase in the number of self-employed tradesmen and the rapid rise in online-shopping.

2.1.2 Second and third life vans play a key role in the UK economy, where they are typically operated by SMEs and sole traders.

2.1.3 Sectors with an active second-hand van market are more directly impacted by the CAZ charge (i.e. construction – 70% second hand, manufacturing – 65% second hand).

2.1.4 The evidence in the note shows that the cost increase experienced by SMEs running second life vehicles would be around 50-70% higher than that of larger businesses running first life vehicles in many cases.

3 AECOM Impact Assessment Technical Note 4 - GM CAP Coach Market Analysis

3.1 Relevant evidence gathered from Note 4 - GM CAP Coach Market Analysis includes:

3.1.1 It is anticipated that the CAZ potentially may disrupt the second-hand market for non-compliant vehicles. For example, it is possible there may be an increase in operators looking to sell non-compliant vehicles while the demand for non-compliant vehicles could also significantly decrease. This could therefore over saturate the market as well as significantly decrease the value of non-compliant coaches, leaving operators at risk of losing value on their assets.

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3.1.2 In terms of fleet size per operator, 71 operators (69%) have between 1 to 5 coaches, which represents the majority. Breaking down the 1 to 5 fleet size range, the majority of total GM operators have just one coach in their fleet, with a total of 31 (30%). The next most common fleet size by a significant size across GM is two coaches, with a total of 22 (21%). These smallest operators are most likely to run special regular services or occasional services

3.1.3 For operators with a fleet size between 1-10 coaches, the average non-compliance was 91%. All 71 operators with one vehicle all were non-compliant. Similarly, for operators with 2 vehicles all but one operator had completely non-compliant fleets.

4 AECOM Impact Assessment Technical Note 12 - GM CAP Evidence of the Impact of 2021 CAZ C

4.1 Relevant evidence gathered from Note 12 - GM CAP Evidence of the Impact of 2021 CAZ C includes:

4.1.1 Early introduction of the CAZ would increase the impact on sectors classified as 'highly vulnerable', such as construction, agriculture, forestry & fishing, from a 51% non-compliant ratio to 65%.

5 AECOM Impact Assessment Technical Note 18 - GM CAP Minibus Vehicle Research

5.1 Relevant evidence gathered from Note 18 - GM CAP Minibus Vehicle Research includes:

5.1.1 10% of the market proportion of minibuses in GM are leasing/rental companies. In terms of main customers or users, 70% of minibuses are likely to be leased to education establishments, and approximately 2% to care homes.

5.1.2 For non-compliant vehicles in leasing markets the CAZ charge could potentially raise the operating cost of a company, with potential cost increases being passed on to the relevant customer. The scale of this impact at this stage however is unknown.

5.1.3 In terms of compliance by LA, at least 85% of minibuses within each LA are non-compliant. By percentage of total fleets, Oldham is the least compliant as all 201 minibuses are not compliant.

6 AECOM Impact Assessment Technical Note 19 – Taxi and PHV Fleet Research

6.1 Relevant evidence gathered from Note 19 - GM CAP Taxi and PHV Fleet Research includes:

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6.1.1 Bolton's fleet has an older age profile with the most common year of registration being 2007 with 150 vehicles, this represents 9% of Bolton's PHVs. 1,293 out of 1,531 are vehicles that were manufactured before the Euro 6 engine standard was introduced in 2015, this means that 84% of Bolton's fleet may not comply with EU standards. Also, 1200 (78%) of Bolton's fleet would not comply with the proposed Minimum Licensing Standards if introduced in 2019.

6.1.2 Rochdale has the third largest PHV fleet in GM with a total of 1,329 registered vehicles. The most common age of vehicle in the fleet is 2007 with 157, 12% of the Rochdale fleet. Although, 2008, 2009 and 2010 all have similar numbers with 149,147 and 136 respectively. Similar to Bolton the vast majority of its fleet may not comply with Euro 6 standards 1176 were manufactured before 2015, this represents 88% of the Rochdale fleet.

6.1.3 Bolton, Trafford and Bury are the three worse performing LAs with the highest proportion of non-compliant taxis. 95 out of 99 (96%) of Bolton's fleet are non-compliant, 135 out of 139 (97%) of Trafford's fleet are noncompliant, and 56 out of 58 (97%) of Bury's taxis are also non-compliant.

6.1.4 The majority of taxi and PHV drivers are self-employed (81%) and own or rent the vehicles they use.

6.1.5 Local authorities do not have the jurisdiction to regulate PHV fares but may authorise the fares used by licensees.

7 SYSTRA Greater Manchester Clean Air Plan: Consultation Activity - Deliberative Research with Taxi and PHV Drivers/Operators

7.1 Relevant evidence gathered from SYSTRA Greater Manchester Clean Air Plan: Consultation Activity - Deliberative Research with Taxi and PHV Drivers/Operators includes:

7.1.1 Drivers and operators felt that a CAZ charge may have detrimental impacts on their profession and therefore their customers. This concern arose from an anticipation that taxi fares would increase to cover the charge, and that surplus from the charge would not be reinvested in the taxi and PHV market but would be invested in public transport. Alongside an increase in taxi and PHV fares, there would therefore be improvements in public transport, resulting in modal shift from taxis and PHVs to public transport, consequently reducing demand for the trade. Drivers felt this impact would particularly affect wheelchair users, who are often reliant on low fares and the accessibility of taxis and PHVs.

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Appendix D: Executive Summary from GM CAP Health Impacts Evidence Report - 2020

1 Air pollution and public health

1.1 Air pollution has been identified as the largest environmental risk to public health in the United Kingdom (UK)[71]. There are five ambient air pollutants thought to be most damaging to public health, of which NO_2 has been found to pose the most significant risk[72]. Defra (2017) estimate that 80% of NO_2 emissions at the roadside are due to transport, particularly diesel light duty vehicles[73].

1.2 Since 2010 the UK has been in breach of the Limit Value for annual mean concentrations of NO_2, as set by the European Union Ambient Air Quality Directive (2008/50/EC), which was transposed into English law by the Air Quality Standards Regulations 2010. Greater Manchester (GM) modelling identified that all ten local authorities has exceedances above the legal limits of NO_2 and predicts that there are 203 points along 160 stretches of road across Greater Manchester where concentrations of NO_2 are forecast to be above required levels in 2021.

2 The Greater Manchester Clean Air Plan

2.1 The UK Government's Air Quality Plan (2017) requires Local Authorities with persistent exceedances to consider the best option to meet statutory NO_2 limit values in the shortest possible time. In 2019, GM Local Authorities came together to submit an Outline Business Case (OBC) for the Greater Manchester Clean Air Plan (GM CAP) to the Government's Joint Air Quality Unit.

2.2 The GM CAP OBC outlined a range of measures to deliver regional compliance with the Air Quality Standards Regulations 2010 for NO_2 emissions. The primary objective of the GM CAP is to reduce ambient NO_2 concentrations in GM to below the legal Limit Value in the shortest time possible. The GM CAP also has a secondary objective to reduce the health impacts of air pollution in GM.

3 Review of evidence sources used up until the end of 2019

3.1 Prior to this GM CAP Health Impact Evidence report, evidence linking air quality (and NO_2 specifically) with public health impacts had been presented in the following documents produced to support the GM CAP:

- GM CAP OBC
- Distributional Impact Assessment

[71] Public Health England (2019) 'Review of interventions to improve outdoor air quality and public health'
[72] DEFRA (2017) 'Air Pollution in the UK 2017'
[73] DEFRA (2017) 'Air Pollution in the UK 2017'

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- GM EqIA
- CleanAir GM website

3.2 A review of these documents has been undertaken and although they did set out a clear link between poor air quality and poor public health, the following gaps were noted:

3.2.1 The documents fail to clearly distinguish the differing impacts of individual pollutants (e.g. NO_2 or PM) on public health. As the focus of the GM CAP is on NO_2 reductions, this is particularly important.

3.2.2 Most of the sources lacked evidence with any geographical granularity. Apart from the assessment of air quality impacts within the Distributional Impact Assessment, most of the evidence presented is at a Global or National scale not directly related to Greater Manchester.

3.2.3 The documents do not quantify the link between poor air quality and incidences (number) of specific illnesses in GM.

3.3 To help bridge the evidence gap, an impartial review was conducted to assess if additional health evidence existed.

4 Review of public health evidence

4.1 A rapid review of public health evidence with clear search parameters was conducted. Some evidence was found to help address the gaps highlighted above, namely:

<u>The impact of ambient NO_2 on public health</u>

4.1.1 Epidemiological studies continue to show associations of ambient NO_2 with adverse effects on public health[74].

4.1.2 In the short-term, NO_2, particularly at high concentrations is a respiratory irritant that can cause inflammation of the airways, coughing, the production of mucous, shortness of breath and heightened risk of heart problems. Long-term concentrations of NO_2 are associated with reduced lung development, respiratory infections in childhood and effects on lung function into adulthood[75], increased asthma prevalence and incidence, adverse birth outcomes[76], lung cancer and kidney disease, chronic and acute respiratory and cardiovascular diseases, and mortality[7778].

[74] Public Health England (2019) 'Review of interventions to improve outdoor air quality and public health'
[75] Atkinson et al (2018) 'Long term concentrations of nitrogen dioxide and mortality: A meta-analysis of cohort studies
[76] COMEAP (2018) 'Associations of long-term average concentrations of nitrogen dioxide with mortality'
[77] Ramacher and Karl (2020) 'Integrating modes of transport in dynamic modelling approach to evaluate population exposure to ambient NO_2 and PM pollution in urban areas'
[78] Latza et al (2009) 'Effects of nitrogen dioxide on human health: systematic review of experimental and epidemiological studies conducted between 2002 and 2006'

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4.1.3 Although the health evidence linking concentrations of NO_2 to public health impacts is continually developing, the link is still not understood as clearly by the scientific community as the relationship between PM and public health.

4.1.4 There has been considerable scientific debate as to whether NO_2 is itself causal or instead a marker for other traffic-related pollutants. In 2018, the Committee on the Medical Effects of Air Pollutants (COMEAP) concluded that evidence associating NO_2 with health effects has strengthened substantially in recent years. COMEAP state that, on the balance of probability, NO_2 is responsible for some of the health impact found to be associated with it in epidemiological studies.

4.1.5 As a result, the health evidence suggests that providing the GM CAP successfully reduces concentrations of NO_2 in GM to be regionally compliant, GM should experience improved public health outcomes. It is likely that if the GM CAP assesses only the public health impacts of a reduction in concentrations of NO_2, they will underestimate the total health impact of the GM CAP.

<u>NO_2 and the impact on public health in Greater Manchester</u>

4.1.6 Dajnak et al (2018) conducted a Health and Economic Impact Assessment associated with current and future pollution levels in GM. They found that:

- If the concentration of NO_2 remains at predicted concentrations, between 2011 and 2030, the total number of life years lost will be 561,169 in GM.
- This will have an economic impact of £343,719,554 (based on 2014 prices).

4.1.7 Dajnak et al (2018) assessed the economic impact of the total number of life years lost as a result of current and future NO_2 concentrations. However, in their assessment, Dajnak et al (2018) did not include NO_2 in the additional modelling they carried out to understand burden effects on annual mortality (number of deaths) rates in GM. NO_2 was excluded from this assessment due to concerns of overlap with the results of the PM analysis. This supports the concerns raised by the academic community questioning whether NO_2 is causal or a marker for other traffic-related pollutants.

<u>Quantifying the link between NO_2 and incidences of illness at a local level</u>

4.1.8 Evangelopoulous et al (2019) produced quantitative statements giving the effect of a given exposure to NO_2 on a range of diseases in the City of Manchester. It is important to note that this was based on Manchester, not Greater Manchester:

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- The risk of emergency hospitalisations for stroke is 2.8% higher on high air pollution (between 4401 and 1064 μgm^{-3} as defined by the Daily Air Quality Index[79]) days than on lower air pollution days (short-term)

- Lowering air pollution by 33.5% on high air pollution days could save 14 hospital admissions for stroke each year (short-term)

- Your child is 4.4% more likely to be hospitalised for asthma on days with high NO_2 pollution compared to days with lower air pollution (short-term)

- Adults are 1.5% more likely to be hospitalised for asthma on days with high NO_2 pollution compared to days with lower air pollution (short-term)

- Cutting air pollution in by one fifth would increase children's lung capacity by around 2.6% (long-term)

- Cutting air pollution by one fifth would decrease the risk of babies being born underweight by around 0.1% (long-term).

4.1.9 Evangelopoulous et al (2019) included evidence for 9 other UK cities. The evidence produced for Manchester is valuable but limited, because the City of Manchester is only one of the Local Authorities in GM. The review of health evidence was unable to find quantified evidence of the impact of NO_2 on health outcomes at a GM scale. That being said, there is no evidence that suggests that the health impacts would be different across GM than elsewhere.

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[79] https://www.metoffice.gov.uk/weather/guides/air-quality

AECOM
Greater Manchester Clean Air Plan Consultation Report

AECOM – the independent agency who has managed and analysed the Greater Manchester Clean Air Plan consultation responses

15th June 2021

Quality information

Prepared by	Checked by	Verified by	Approved by
Hannah Dodd Consultant Neil Rogers Principal Research Consultant Jodie Knight Principal Research Consultant	Neil Rogers Principal Research Consultant	Tamsin Stuart Regional Director	Frank Mohan Regional Director

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Distribution List

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Prepared for:

Transport for Greater Manchester and the 10 Greater Manchester Local Authorities

Prepared by:

Neil Rogers
Principal Research Consultant
T: 0161 927 8373
E: neil.rogers@aecom.com

AECOM Limited
1New York Street
Manchester
M1 4HD
United Kingdom

T: +44(0)161 601 1700
aecom.com

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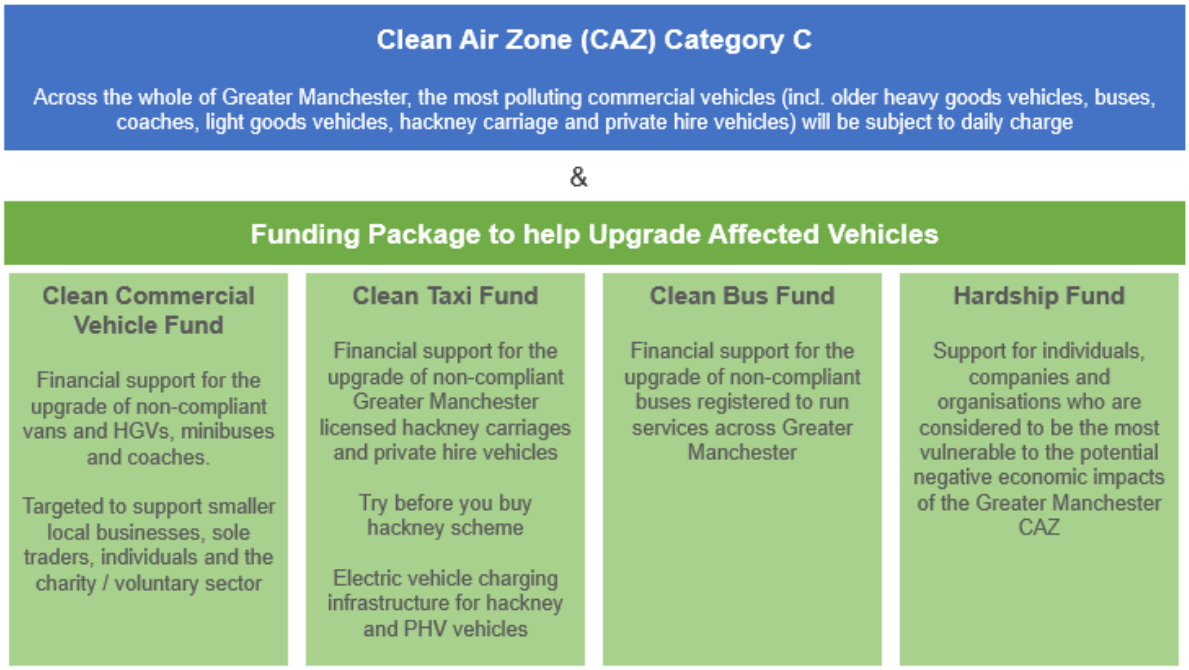
Executive Summary

Introduction

As set out in the Consultation document, the Secretary of State has instructed many local authorities across the UK to take quick action to reduce harmful Nitrogen Dioxide (NO_2) levels, issuing a direction under the Environment Act 1995 to undertake feasibility studies to identify measures for reducing NO_2 concentrations to within legal limit values in the "shortest possible time". In Greater Manchester, the 10 Local Authorities, the Greater Manchester Combined Authority (GMCA) and Transport for Greater Manchester (TfGM), collectively referred to as "Greater Manchester" or "GM", have worked together to develop a Clean Air Plan to tackle NO_2 Exceedances at the Roadside, referred to as GM CAP.

Summary of the Proposed Clean Air Plan



Consultation

A consultation took place between Thursday 8 October and Thursday 3 December (running for 8 weeks in total). A total of 4,768 responses were captured via:

- Online questionnaire (3,954 responses);
- Paper questionnaire (43 responses);
- Email (770 responses); and
- Telephone (1 response).

Respondents have been grouped as follows:

Respondent type	Description	Number of responses*
General public	A personal response by an individual, the report will also refer to as the public and members of the public	3,858
Businesses	A response on behalf of a business, including anyone who is self-employed and / or a sole trader and includes taxi owners, drivers and operators	784
Representatives	An organisation** or a councillor / elected official	124

*Two respondents did not provide an answer to the respondent type

**An organisation includes but is not limited to schools, charities, social enterprise, trade organisations, government bodies

The consultation was subject to two campaigns; a large volume of identical responses were received by email:

- 172 emails were received from one group; the Environmental Bill Lobby; and
- 484 were received from the CAZ support group.

The Federation of Small Businesses (FSB) conducted its own survey about the Clean Air Plan and shared its results.

The British Horse Society and the Horse and Hounds advertised the Clean Air Plan amongst its followers, which resulted in a higher than expected response from those with private leisure vehicles.

Of those responding to the survey 77% of businesses and 17% of the public had one or more vehicles that could be affected by the introduction of the CAZ.

Boundary

Just over a third of the public and representatives and a quarter of businesses provided a comment about the boundary. Responses were very polarised; a third of the public and half of representatives provided a positive comment whereas half of businesses raised concerns. The most frequently mentioned comments included:

Support	Concerns	Suggested amendments
Agree with the boundary	Area is too big	City centre should be an Ultra-Low Emission Zone
Include the SRN / other strategic roads	Negative impact on those based on the GM boundary	Boundary should focus on city centre
Make the zone larger		Just those areas with poor air quality

"It should include Motorways - need to lobby highways to include M56, M60, M62 and M602." (Public)

"It's too large an area and the problem area are clearly in the built-up conurbations. If this has to be implemented, then it should be far more targeted at areas with specific high pollution issues not a blanket rule across the whole of GM much of which does not have a problem with traffic-based pollution" (Business, with LGV)

"Far too large, should restrict to Manchester City Centre." (Public)

"I think it's correct that it doesn't cover just the city centre area. There are high population densities throughout the area highlighted, which all need protecting." (Public)

Representatives: Concerns were raised by neighbouring authorities about the impact on those based in neighbouring authorities. Issues included: business relocating non-compliant vehicles to neighbouring areas and therefore moving the problem on; increased rat-running, as drivers try and avoid the charge; and congestion, as vehicles re-route. Concerns were also raised for businesses based just outside the boundary who would be subject to the charge but would not benefit from the funding offers.

Hours of operation

Around a third of the public and representatives and a sixth of businesses provided a comment about the hours of operation. Over half of the public and representatives, who provided a comment generally supported the operation times, whereas two thirds of businesses suggested amendments to the operation times.

Support	Concerns	Suggested amendments
Support the proposed operation times	Generally against	Do not charge for evening / night-time journeys
		Only charge peak time journeys
		Do not charge weekend travel
		Only charge once in a 24-hour period

"Delighted that it will be 24 / 7 to avoid time shifting of vehicle use / deliveries if operation did not include the night hours." (Public)

"Pollution doesn't operate by a clock" (Public)

"Not really a clean air zone then! congestion charge because why is it going to run 24/7 when (NO_2) levels will be within the legal limits at certain times. (Business with hackney carriage)

"24 hours a day seems a lot given the pollution levels would be highest at peak times (7-10am, 3-7pm)" (Public)

"We support the 24/7 nature of these proposals. We would urge Greater Manchester to ensure that only one payment occurs per rolling 24-hour period….to avoid…double charges for a single journey. This is particularly an issue for the night-time economy, and for businesses such as the airport that are used overnight." (Business owns bus and LGV)

Representatives and stakeholders made suggestions to amend the proposed midnight to midnight timing for a daily charge:

> *"We believe a midnight to midnight 'charging day' would disproportionately impact taxi and private hire vehicles… As an alternative, we believe the Clean Air Zone 'charging day should apply from 4am-4am." (Business, Private Hire Operator)*

Charges and Exemptions

Non-compliant vehicles would be subject to the following daily charge		
£7.50	**£10.00**	**£60.00**
Hackney carriages	Minibuses	Buses / Coaches
Private hire vehicles	Vans	HGVs

Whilst there will be some exemptions granted for certain types of vehicle, those with non-compliant vehicles who do not pay the daily charge will be liable to receive a proposed Penalty Charge Notice (PCN) of £120 per day.

The table below shows the proportion of respondents feeling the daily charge for each type of vehicle is too much, too little or about right (some respondents did not know which is not shown in the table). It also includes the most frequently mentioned comments given by respondents to explain the reason for their score.

- Views on the proposed daily charge vary, businesses felt charges for all vehicles are too much and the public felt the charges are about right or too little;
- Typically, 40% of the public felt charges for each type of vehicle type were too much and 50% felt the charges were either about right or too little;
- Bus charges were the exception for the general public: 52% felt they were too much and 38% about right or too little. Those aged under 35 felt the bus charge was too little or about right and those aged over 45 that it is too much.

		Public (%)	Business (%)	Repres-entatives (%)	Main comments
Bus	Too much	52	72	35	Buses take traffic off the road due to less personal vehicle traffic Concern charges will be passed on
	About right / too little	39	19	56	Support the charges – are polluting vehicles
Coach	Too much	43	70	28	Cannot afford the charge Will impact tourism / GM economy
	About right / too little	48	21	61	Support the charges – are polluting vehicles
HGV	Too much	40	74	29	Business already runs on tight margins
	About right / too little	53	19	62	Large companies can afford the charges
LGV	Too much	40	75	37	Will impact small business
	About right / too little	54	21	58	Not enough to promote change
Minibus	Too much	38	71	33	Carry more passengers than a car or van
	About right / too little	55	22	59	No comments provided
Hackney carriage	Too much	40	73	31	Cannot afford charge Will cause drivers to leave
	About right / too little	52	21	61	They're always on the go
Private hire	Too much	41	73	34	Cannot afford charge
	About right / too little	53	23	56	Do a significant number of miles

Views from public and representatives in favour

Client Earth	*For the Councils' CAZ scheme to be effective at reducing illegal levels of pollution, quickly, the applicable charges must be set a level that deters the use of the most polluting vehicles. This is essential if the Councils' plans are to work to protect people's health and comply with legal requirements to tackle illegal levels of NO_2 pollution in the shortest possible time.*
Public	*"Not enough. Should be about 100 times higher. Disgraceful that you aren't charging private cars."* *"The charges should be as high as possible to deter going in the area. Health & climate change are two of the most critical issues of our time. Private cars should definitely be included as well."*

Views from vehicle owners against

Bus	*"Buses & coaches should have a cheaper charge as they significantly reduce traffic on the roads, cars should have a much higher cost."*
Coach	*"You've not got the £60 / day in your contract to just lose, we just haven't got it. We're not being pathetic and just saying it, it's actually true."*
HGV	*"I think these charges are ridiculous. Living inside the boundary means I'm going to have to find £70 a day before I even turn a wheel (60 for my truck and 10 for my van). That's £350 if I work 5 days. How can I pass this on to my customers?"*
HGV Leisure vehicle	*"The charge means I just won't go into the region. I won't attend some of the riding schools there and I now won't go to the garage that I have gone to for years because he is in Urmston so I would be charged."*
LGV	*"Well, somebody who's a small builder or has their own small business, that's £50 a week in that van, that's £250 a month on top of your road tax and all the other taxes."*
Minibus	*"Why on earth would you charge buses and minibuses who reduce the need for cars on the road and reduce the overall emissions by carrying lots of people at once."*
Hackney carriage	*"That's extortion to be honest how on earth hard working drivers will be able to pay these ridiculous charges when it's hard to put food on table and paying bills. When overheads are already suffocating Hackney trade and no means of fair competition this would be last nail in coffin for sure"*
Private hire	*"The charges for taxi are high, due to the business inflation It is not possible to afford £7.50 a day. Sometimes we are not able to make £20 for whole day and pay 7.50 for clean air, what is left for us."*

Exemptions and discounts

Permanent local exemptions	Temporary local exemptions	Permanent local discounts
Greater Manchester are proposing permanent local exemptions for Clean Air Zone charges for specialist vehicles, vehicles entering Greater Manchester due to a road diversion on the motorway network and vehicles used for the purposes of a disabled person which are exempt from vehicle tax.	Greater Manchester are proposing temporary local exemptions from Clean Air Zone charges until 31 December 2022 to give certain vehicles more time to upgrade due to cost / supply of a compliant vehicle and to lessen impacts considered outside of the control of the vehicle owner, these include wheelchair accessible hackney / private hire vehicles, and vans.	Greater Manchester are proposing permanent local discounts for Clean Air Zone charges for private hire vehicles licensed to one of the 10 Greater Manchester Local Authorities and also used as a private car, and leisure vehicles greater than 3.5 tonnes in private ownership.
Agree: 68% of the public, 55% of businesses and 77% of representatives	**Agree:** 64% of the public, 54% of businesses and 67% of representatives	**Agree:** 44% of the public, 46% of businesses and 57% of representatives
"It is unfair to charge a vehicle a daily rate if they had no other option than to travel in the payment zone due to a diversion." (Public)	*"I don't think the extension is long enough, I calculate that I would need to find £200,000 to upgrade my fleet to avoid charges. This is impossible in two years. This extension should be a 3 year minimum to give business a chance to respond" (Business, LGV)*	*"We regularly use ours (vehicle) for personal use, so would make it difficult to choose whether to taxi or have a family car if we couldn't do both due to having to pay the charge on days we weren't utilising the taxi as a taxi" (Business, PHV)*
Concerns about the exemption:		
"Permanent exemption means there is no incentive for these vehicles to be compliant, ever. Community minibuses - fair enough that these are given time to comply but an open ended exemption is putting polluting vehicles into the centre of communities, e.g. travelling to schools" (Public)	*"We need to reduce the impact of these vehicles urgently, not in 2 years time so whenever the deadline, they are likely to wait as long as they can before upgrading / replacing. Let people know about it now through promotions and set the deadline as December 2021" (Public)*	*"All private hire vehicle owners will simply claim their vehicle is used as a private car and therefore claim the exemption. This would make the charge on private hire vehicles pointless." (Public)*
Suggested additional exemptions:		
• Private leisure vehicles (e.g. horsebox, motorhome) • Vehicles used by disabled / vulnerable users • Buses	• Specialist vehicles and those used by disabled • Taxis and private hire vehicles • Private leisure vehicles (e.g. horsebox, motorhome)	• Located outside GM but operate within • Leisure vehicles • More vehicles / affected people (general)

Funding

Clean Bus Fund	Clean Commercial Fund	Clean Taxi Fund
Greater Manchester are proposing financial support to help operators who are registered in Greater Manchester and run a registered bus service in Greater Manchester.	Greater Manchester are proposing financial support to help smaller local business, sole traders, Voluntary, Community and Social Enterprise (VCSE) organisations and private individuals upgrade vans and HGVs, minibuses and coaches, to cleaner more compliant vehicles.	Greater Manchester are proposing financial support to help upgrade hackney carriages / private hire vehicles licensed to one of the 10 Greater Manchester Local Authorities to cleaner compliant vehicles.
Support for the funds: There was high level of support for the funds amongst all respondent types and many felt it was needed in order to help business upgrade:		
"I welcome this idea [bus fund] and think that as much support as possible should be directed towards supporting public transport operators to reduce the financial impact of the changes." (Public)	*"Supporting them is the only way they will be able to switch vehicles. If you want the scheme to be successful you must give them support." (Councillor / Elected Official)*	*"I know cabbies don't make a huge living, so there needs to be grants and incentives to support the transition into new vehicles as opposed to letting them opt out if they say they cannot pay." (Public)*
Concerns about the funds and their management: • Higher funding amount: many comments were received stating the proposed amounts are not enough • However, there were some concerns amongst the public that public money should not be used to fund private enterprise and businesses should find the funds themselves • There were some concerns about mismanagement of the funds and people taking advantage of the scheme • Concerns were raised for those that are based just outside of the boundary and several comments were made that funding should be available to them		

Clean Bus Fund

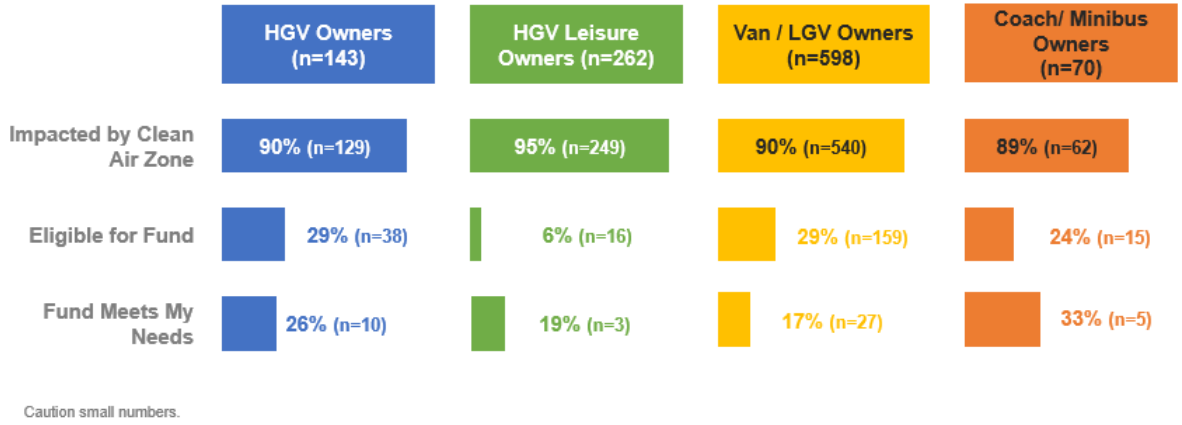
The number of bus operators in Greater Manchester is comparatively low to the number of HGV and LGV drivers, therefore the number who responded to the consultation was relatively low.

"We welcome the aim of the Fund and understand the management and distribution. We do however recognise the shortfall against the initial ask and have some concern that there may be a shortfall in the number of compliant vehicles at the time the charging is introduced. There could also be delays in supplies of the necessary kit which may lead to installations being delayed or suspended." (Arriva)

"The grant limit for both bus and coach of £16,000 per vehicle is not a true reflection of the cost of retrofitment and we understand it was based on average cost, setting a higher limit would be fair and equitable." (CPT)

Clean Commercial Fund

The figure below shows the number of respondents with an affected vehicle, whether they thought they would be eligible for funding and if so, did that funding meet their needs. Most did not feel the funding meets their needs.



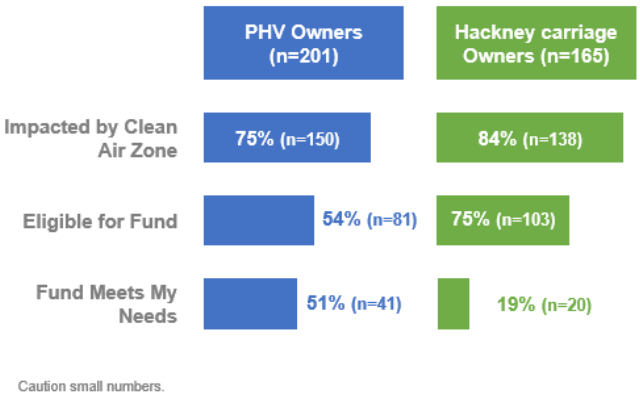
Main reasons funds do not meet their needs

	Funding amount is not enough	Cannot easily replace vehicles	Cannot afford to upgrade
HGV	*"The cost of replacing the vehicles would leave me with a financial short fall of £35,500 for a second hand or £90,000 for brand new. 'Up to' £4500 is nowhere near enough."*	*"Insurance for electric commercial vehicles is a significant problem, there is only one insurer prepared to offer cover and it is exorbitant. This failure of the insurance market needs to be taken up by the Govt."*	*"the replacement vehicle we purchased last year … cost just under a quarter of a million pounds to replace one vehicle. … it does have quite a knock-on effect with obviously profit margins"*
Leisure	*"I would need help in meeting the additional costs brought on directly or indirectly by this action"*	*"Funding won't go far enough. Not with specialist vehicles, because to me a horsebox is a specialist vehicle, you know, it's not just a box, you know, there's a lot of things that go into making that safe to transport up to three half ton animals at the end of the day."*	*"the second-hand value of [my] vehicle and the likely replacement cost of a compliant vehicle there is a significant gap. This is without taking into account that the proposals may lead to a drop-in value of non-compliant vehicles and an increase in cost (due to supply issues) of compliant vehicles."*
LGV / Van owner	*"£3.5k to purchase a new van. Have you tried purchasing a used LGV before, as this goes no way near the cost involved. My business can't afford or justify the purchase of a much newer vehicle."*	*"it still requires too much investment from the business, our vehicles are not just vehicles, the have to have custom made fittings in the cargo area which can also run up to £3000-£4000 on top of the price of the vehicle"*	*"The money you are suggested is available is about 1/3 the cost of a new van. Selling my current vehicle would raise another couple of grand but to expect me to pay out £6000 of my own money in the next couple of years with the current loss of revenue is wrong".*

	Funding amount is not enough	Cannot easily replace vehicles	Cannot afford to upgrade
Coach / minibus	*"It's £5,000 towards a minibus and to get a Euro 6 even a Ford Transit you're looking at about £27,000 so £5,000 towards that is another £21,000 per vehicle times three, so it's a big debt that you're getting yourself into for the sake of earning not enough."*	*No comments*	*a Euro 6 coach is £250,000, we have fourteen vehicles, that would be over £3 Million pounds and our annual turnover is £450,000, so you tell me how we're supposed to do that?"*

Clean Taxi Fund

The figure to the right shows the number of respondents with an affected vehicle, whether they thought they would be eligible for funding and if so, did that funding meet their needs. Most did not feel the proposed level of funding meets their needs.



Main reasons proposed funds do not meet their needs

	Funding amount is not enough	Decrease in value of current vehicle due to proposals	Cannot afford to upgrade
Hackney carriage	*"To replace my vehicle with a CAZ compliant one at the present time would cost me £25000. To go fully electric without taking a drop in the standard of my vehicle would cost £60000. Offering £5 -10K doesn't cut it."*	*"the fact that my vehicle is Euro5 means that it's trade in value has been heavily reduced by the CAZ plans meaning its even less likely that I will be able to upgrade to a compliant vehicle"*	*"I've struggled for the past 3 years to pay finance on a 25k loan, which I took out to upgrade my vehicle in the hope it would be a long time investment. Now your [sic] asking me to ditch my vehicle and take out another loan for 40k"*
Private hire vehicle	*"If the Government allows a less then [sic] 5 year old private hire car then they should support more because £1000 for private hire is nothing. New cars are very expensive. No one can afford by himself".*	*No Comment*	*"Because I would still need to go into more debt than I am already in and it will push me nearer to the edge that I am already teetering on."*

Try Before You Buy

To tackle the barriers to switching to electric vehicles (EV), GM is proposing a "Try Before You Buy" initiative for GM-licensed hackney drivers.

Support	Concern
Understanding: will help drivers get a better idea of vehicles and capabilities **Overcome anxieties** surrounding electric vehicle technology and encourage more drivers to convert to electric **Extend to other vehicles**: such as PHV and LGVs	**Unnecessary**: if hackney drivers are going to upgrade to EV anyway **Lack of EV infrastructure:** and when to charge vehicles if they are in use 24 hours **Performance of EV** and battery life **Cost of EV:** unaffordable for some

"I would be interested in the try before you buy scheme." (Business, Hackney)

"Great idea. an equivalent for vans would be even better, as there are many more of these impacted." (Public)

"It's not the trying the vehicle it's the amount it is to buy one" (Business, Hackney)

"I know a two-year-old electric car, it needs batteries already and it's costing …. £1200." (Business, Hackney)

Representatives commented:

"Members feel that this is a good idea if it sits within a comprehensive package of measures. There's no point in it if the electric option is financially non-viable, as it is currently is under the suggested proposals." (Unite the Union)

Impact of Covid-19

76% of businesses and 79% of taxis stated they had been financially impacted by Covid-19.

Financial effect	Level of debt increased	Reserves / Savings reduced	Turnover lower	Profitability lower
Business	60%	75%	89%	84%
Taxi	71%	65%	82%	81%
Organisation	63%	67%	83%	71%

Base: all respondents financially impacted by Covid-19

Main comments received about the impact of Covid-19

Impact on Business	Impact on Air Quality	Timings of the CAP
Increased financial pressure: many had lost significant amounts of income and an uncertain future made business unable to invest	**Highlighted the need to improve air quality:** experiencing better air quality had enabled people to see the difference in air quality. Its highlighted air quality does impact health conditions	**Shouldn't be delayed:** those without an impacted vehicle felt the proposals should not be delayed as clean air is important
Cannot afford to upgrade vehicles: many stated any savings had been used and felt their credit rating had decreased	**Has resulted in improved air quality** and will continue to do so as more people continue to work at home	**Should be delayed:** Businesses felt the proposals should be delayed giving them time to recover financially

"If you introduce this then we are closing the business." (Business, LGV)

"Our business has been decimated by Covid. We have seen all our event work cancelled." (Business, LGV)

"clean air/our health has to be prioritised. Won't clean air be more important if we have many people living with the long-term effects of Covid-19." (Public)

"I think the big issue is the industry has got no money. We've all had nine months, pretty much twelve months without earning any money. Nobody's going to have the money to invest in vehicles next year. Nobody's investing this year, so everybody's a year behind where they were. There's not going to be the money next year, because we're not going to be as busy." (Business, Minibus/Coach)

"It's obvious that the city will never get back to the levels of commuting we had before. so many people and companies have made the move to home working permanent. we should therefore re-model what we need to do to achieve the targets as post-Covid is clearly going to be a different case." (Public)

Importance of air quality and confidence the Clean Air Plan will bring down NO_2 levels

Members of the public and representatives mainly agreed there is a need to improve air quality in Greater Manchester, fewer businesses did. A third of members of the public and a quarter of businesses had confidence the CAP would meet its objectives. Some felt the proposals did not go far enough but others felt there were other much larger contributors to air pollution than traffic.

	Air quality needs improving (% agree)	Confidence in the CAP (% agree)
General Public	74	35
Businesses	45	23
Representatives	80	40

Support of the proposals

Support the Proposal	Further action
Support the proposals: with many stating 'air quality is important' especially with Covid-19 and other respiratory illnesses	**Include private cars:** supporters of the proposals felt private cars should be included and without them the CAZ will not be very effective
Implement as soon as possible: many supporters felt the proposals should be implemented as soon as possible as pollution needs to be reduced to improve public health	**Other initiatives to improve air quality:** such as homeworking, discouraging car use, improving traffic flows and preventing idling were all mentioned as ways to reduce NO_2 levels
Need to tackle other pollutants from industry, stopping building on green belt land, the airport were all mentioned as other large contributors to pollution in general	**Improvement to active and sustainable travel** were seen as important initiatives to improve health and reduce air pollution

"We all need to be proactive in helping with Pollution and peoples health." (Business, LGV and HGV)

"I believe that air quality is everyone's problem and, as such, cars should also be included in the plans to encourage the use of public transport. This is not just an issue caused by commercial vehicle operators." (Business, LGV, HGV)

"Great that GM is attempting something so ambitious for the good of local health and wellbeing, and the environment." (Public,)

"As someone who mostly walks/cycles I absolutely welcome the initiative. I also support the mitigating measures for support of transport businesses. I also feel that the charges for polluting commercial vehicles are only one of various ways to tackle the pollution problem. Radical and strictly enforced speed limits across GM combined with an extension of bus/taxi lanes and bike lanes would reduce pollution and also make walking and cycling safer, and discourage the use of private vehicles." (Public)

"Allow regional airports to take aircraft away from Manchester, this would reduce air pollution and decrease the amount of vehicle usage around this pollution hub." (Business, LGV)

Concern about the proposals

Impact on Greater Manchester	
Won't improve air quality: some members of the public did not feel the proposed approach will do enough to improve air quality	**Negative impact on GM business:** many businesses stated how they could ill afford the charges or gather the finance to upgrade and therefore the proposals will have a significant impact their business operation
Stealth tax / congestion charge: several businesses referred to the proposal as a money-making scheme	**Negative impact on GM economy** as people and businesses will avoid the area and trade, visit or shop elsewhere
Increase costs goods / fares: charges would be passed onto the consumer through increased bus fares, delivery charges and taxi fares would increase	**Will cause business to relocate outside GM:** Several respondents stated they would move their home or business to outside GM to avoid the charge

"Do not proceed with charges. I'm of the opinion that this is just another way of generating revenue, another stealth tax. If any charges are implemented I will move my business to an area outside Greater Manchester." (Business, LGV)

"This will hurt the local economy. So I expect to see prices for goods and services creeping up as the costs get passed on to consumers. Taxi fares will go up, businesses will incur extra costs transporting goods so prices will go up, local man-and-van trades will incur extra costs so their rates will have to go up. For an economy already on its knees from Covid, how can this be a sensible idea?" (Public)

"I think because private vehicles aren't banned and stuff like that or are not going to be charged, I don't think there'll be a positive {effect]. There'll probably be a slight positive effect, but some people will have to give up their vehicles, because they can't do that type of work anymore or whatever, it'll have to change…. I don't think it'll be the massive effect that they expect or they hope." (Public)

"Traders will be discouraged from coming to GM and the economy will decline, resulting in financial problems for local authorities and a more depressed environment. Also, higher costs due to surcharges for deliveries." (Public)

"This charge will undoubtedly force operators out of our industry and place a greater financial burden on the ones not eligible for funds to change. The potential knock on effect to our company and the industry in general is significant. This could be that we lose the ability to deliver the volumes required by our customers and so lose contracts and our business suffers. (Business)

"Higher charges for buses, taxis, goods in shops will all be passed on to the consumers." (Public)

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1. Introduction

1.1 Background – Overview of the Clean Air Plan

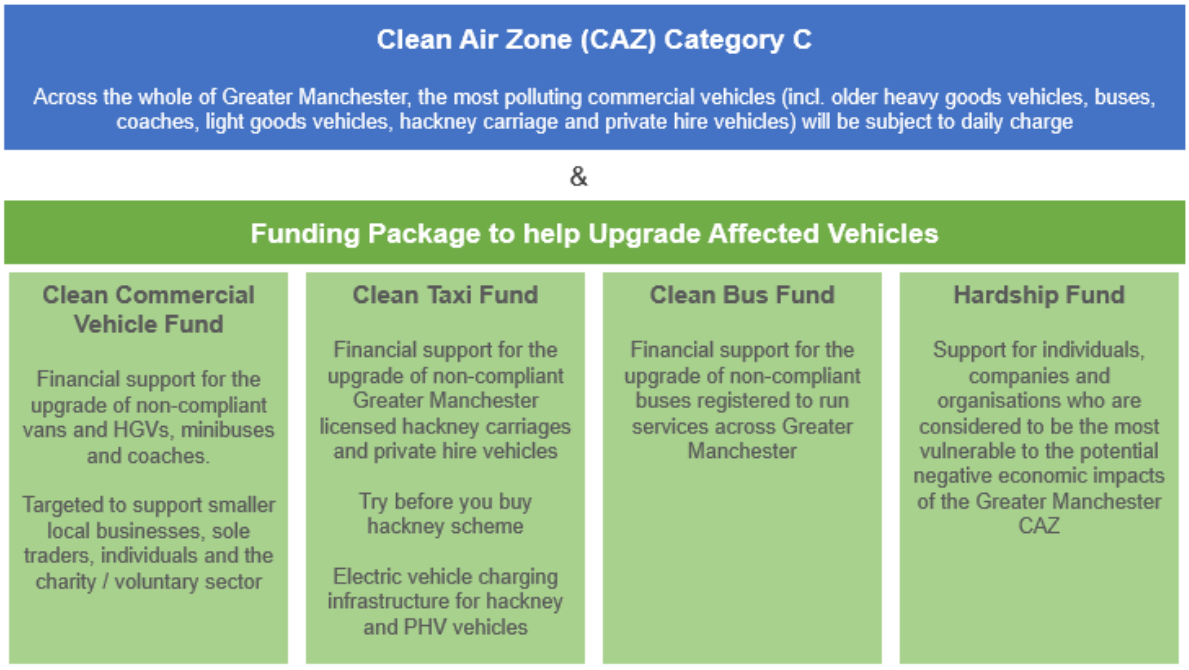
As set out in the consultation document: Government is working with more than 60 local authorities across the UK to improve air quality. Greater Manchester has received a direction from Government to introduce a Clean Air Plan to bring nitrogen dioxide (NO_2) levels within legal limits in "the shortest possible time".

As air pollution does not respect geographic boundaries, the ten GM Local Authorities (Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Stockport, Trafford, Tameside, Wigan) have come together to produce a joint plan. This co-ordinated approach is seen as the most effective way to deal with a problem that affects all parts of GM and will not be remedied on a site-by-site or district-by district basis. The Clean Air Plan is being co-ordinated by Transport for Greater Manchester (TfGM).

The core goal of the GM Clean Air Plan is to address the legal requirement to remove ALL concentrations of NO_2 that have been forecast to exceed the legal Limit Value (40 µg/m3) identified through the target determination process in the "shortest possible time" in line with Government guidance and legal rulings.

Throughout the development of the plan, GM has considered a range of options to deliver compliance, overseen by the GM Steering Group and to understand the type and scale of intervention needed to reduce NO_2 to within legal Limit Values in the "shortest possible time" across Greater Manchester.

In March 2019 the GM Authorities agreed the submission of the OBC which proposed a package of measures that was considered would deliver compliance in the shortest possible time, at the lowest cost, least risk and with the least negative impacts. The core package components, as detailed in the Policy for Consultation, include:



NOTE: When Greater Manchester or GM is used to describe the decision-making body in this document, it refers to the 10 Local Authorities of Greater Manchester.

Alongside the CAP, work has taken place to develop proposed licensing standards for hackney and private hire vehicles. A separate but complementary consultation has taken place on these standards and the response to this is reported separately.

TfGM hosted a public consultation on behalf of the 10 Local Authorities. AECOM collated the response to the consultation and independently analysed the response which is presented in this report.

1.2 The Consultation

The GM CAP consultation was held between Thursday 8 October and Thursday 3 December (running for 8 weeks in total).

Some of the key characteristics of the GM Clean Air Zone are specified by Government, but the consultation sought views on key elements of the CAZ and funding packages and provided an opportunity for all those with an interest in the proposals to provide further feedback. The outcome will help TfGM gain a better understanding of how the proposals would impact residents, businesses and visitors.

The consultation was based around four key areas:

- The characteristics of the Clean Air Zone including the boundary, timings and charges;
- Permanent and temporary exemptions;
- Funding to support the upgrade of non-compliant vehicles; and
- The impact of Covid-19 on people's ability to respond to the Clean Air Zone.

Covid-19 statement from the Local Authorities

"Greater Manchester's (GM) Local Authorities, following the Government's advice and Ministerial Direction, agreed to undertake a statutory public consultation on the Greater Manchester Clean Air Plan (CAP), based on proposals developed before the Covid-19 pandemic.

GM is assessing the possible effects of Covid-19 on the Clean Air Plan, as circumstances may have changed and therefore there may be a need to reconsider elements of the proposal including the financial support provided. The consultation therefore asked about the impact of the Covid-19 pandemic to help inform decisions on the nature and requirements for additional support for those most vulnerable to the proposals.

GM have stated the information contained within this report, particularly the impacts of Covid-19 will be used to help inform future decisions on each aspect of the final plan. Before bringing a Final Plan to decision makers GM will:

- *Review all the information gathered through the GM CAP and MLS consultations; and*
- *Fully consider all the information and evidence gathered, so it can understand and mitigate (where possible) the economic impacts Covid-19 has had on vehicle owners and trades affected by the GM CAP proposals."*

1.3 Objectives

The overall objective of the consultation was to inform all interested parties about the proposed Clean Air Plan and to enable them to have their say on the proposals.

NOTE: The consultation was not seeking views on whether to introduce a clean air zone as this had already been directed by the Secretary of State. Instead, it set out a position for

consultation on the daily charge, discounts and exemptions of a Category C GM Clean Air Zone, and the proposals for the supporting funds that have been developed taking stakeholder engagement and statistical modelling into account.

The consultation sought:

- To provide an opportunity for businesses, organisations, residents and visitors to have their say on the detailed CAP proposals;
- To fulfil the statutory requirements for the consultation activity related to the implementation of a charging scheme;
- To understand in more detail the impact the measures would have on those who respond, identifying differences by demographics and geography; and
- To understand the impacts on groups who are deemed to be most affected.

1.3.1 Response Mechanisms

The consultation adhered to the government's Covid-19 guidance on social distancing in place at the time and therefore no face to face response mechanisms were available. The primary response mechanism was an online questionnaire, available via the TfGM website. Alternative means of responding were also available including:

- A specific version available for respondents who required the use of specialist screen reader software;
- Hard copies available via telephone and distributed via LAs with a freepost envelope provided;
- Letters and emails via dedicated postal and email addresses; and
- Telephone via a dedicated freephone number, a language line facility was also in place for non-English speakers.

The number of responses for each response mechanism is shown in **Table 1-1.**

Table 1-1 Number of responses

	Online	Hardcopy (paper)	Letter / Email	Telephone	Total
Number of responses	3,954	43	770	1	4,768

An additional piece of qualitative research took place with those likely to be affected by the proposals. This research ran alongside the consultation survey and took place with:

- 22 online focus groups with up to 5 respondents per group; and
- Six individual depth interviews.

The general public and business owners and managers participated in both group discussions and depth interviews.

A further 40 depth interviews were completed with hackney carriage and private hire vehicle drivers, owners and operators and 4 groups were completed with taxi / PHV users. These were combined with the Greater Manchester Minimum Licensing Standards consultation which ran concurrently.

Further details on the qualitative research can be found in **Appendix D** with the analysis supplementing and supporting the findings in each chapter.

1.4 Format of Report

Following this introduction:

- Section 2: describes the methodology with further detail in **Appendix A**;
- Section 3: discusses the profile of respondents with data tables available in **Appendix B**;
- Section 4: discusses the response to the clean air zone (CAZ);
- Section 5: discusses the respondents views of each of the three Funds, vehicle finance, hackney 'try before you buy' and the hardship fund;
- Section 6: details how respondents have been impacted by Covid-19;
- Section 7: discusses the overall impact of the clean air plan on respondents; and
- Section 8: outlines comments about the draft Equality Impact Assessment.

2. Methodology

2.1 The Questionnaire

A questionnaire was designed by TfGM on behalf of the 10 GM Local Authorities, a copy of which can be found in **Appendix C**. Prior to the consultation AECOM carried out cognitive and pilot testing, details of which are available in **Appendix A**.

The final questionnaire included questions to elicit comments about:

- The boundary and the operating timings of the clean air zone;
- Proposed daily charges by vehicle type;
- Temporary and permanent local exemptions and proposed local discounts;
- Funding: the clean bus fund, the clean commercial vehicle fund and clean taxi fund;
- The vehicle finance offer and hardship fund;
- Attitudes towards air pollution;
- Confidence in the proposed Clean Air Plan;
- Impact of Covid-19;
- Expected impact of the proposals; and
- Views on the draft Equality Impact Assessment (EQIA).

2.1.1 Focus Groups and Depth Interviews

In order to understand the key concerns and impacts of those who could be most affected by the CAP proposals, qualitative research took place. This research ran alongside the consultation.

The focus groups and depth interviews included the general public, businesses with affected vehicles and taxi drivers and operators. The groups took place over the same weeks as the consultation. Each group was scheduled for 90 minutes with depth interviews for one hour. In each chapter, the findings from the questionnaire are supported and supplemented with the findings from these groups and interviews. Further detail of the groups and the full profile of respondents are shown in **Appendix D**.

2.2 Data Management

This section explains how the data was processed and coded. Additional details are available in **Appendix A**.

2.2.1 Data Processing

Response data was downloaded from the online portal and collated with data from all the letters and emails received.

Data was cleaned to ensure accuracy as follows:

- All questions not answered by a respondent were given the same value as “missing” data to ensure these were not included in the analysis; and
- Where a response was specified in free text which could be attributed to an answer in the list provided in the questionnaire, this was updated.

2.2.2 Campaigns and Interest Groups

A large volume of identical email responses was received. It is not clear who organised the campaigns and they have been named based on the content of the email:

- 172 emails were received from one group; the Environmental Bill Lobby; and
- 484 were received from the CAZ support group.
- Nine people sent two emails; one for each campaign. In these instances, the emails were combined for each person and analysed as a single response.
- The emails received were coded in the same way as all other responses (see coding section 2.2.3) and where the number of reported responses greatly increased as a result of these emails this is shown in the report.
- The Federation of Small Businesses (FSB) conducted its own survey about the Clean Air Plan and shared its results.
- The British Horse Society and the Horse and Hounds promoted the Clean Air Plan amongst its followers which resulted in a high number of responses from those with private leisure vehicles.

2.2.3 Coding

All free-text responses and letters and emails were grouped into themes to allow meaningful analysis. Letter and email responses were combined with the free text comments given in the questionnaire for analysis purposes.

Where possible, free text responses have been analysed by topic rather than response to a question to allow meaningful analysis and avoid double counting where respondents have given the same response to several questions.

The themes from each question were created by AECOM using the initial set of responses, these were verified by TfGM before full coding began. Where new themes emerged, these were verified before continuing. A minimum of 10% quality assurance checks and validation were completed on the coding for each question by both AECOM and TfGM.

Throughout the report quotes from the free text responses and letters and emails have been used to illustrate the points raised. Quotes have been selected to best show the essence of what was said for each theme.

Additional information about the coding process is shown in **Appendix A**.

2.2.4 Preparation for analysis

The frequencies for each response per question were calculated, checked and verified to ensure all data had either a response, a no comment or a missing value. This data was prepared for analysis by creating a series of cross-tabs for key criteria such as demographics, vehicle ownership and vehicles impacted, those more vulnerable to air pollution and those impacted by Covid-19. A full list of cross-tabs produced is shown in **Appendix B.**

2.3 Analysis and Reporting

The Consultation was open to all and, therefore, respondents were self-selecting. This, coupled with the fact respondents could choose which of the questions they answered, means the results and responses should be viewed as indicative of the wider population and any identified sub-groups rather than representative. The profile of respondents is detailed in the next section.

As respondents were not obliged to answer all questions in the questionnaire, the percentages shown only include those that responded to each question.

Where percentages do not sum to 100% in the main body of the report, this is due to rounding. A * denotes less than 0.5%.

Statistical significance testing was completed at the 95% confidence level. Where results are reported as different between sub samples, this means the differences are significant at the 95% confidence level. Only data which is significant has been referenced in the report.

The findings from the focus groups have been included alongside the findings from the questionnaire, whether this supports and enhances a point of view with an example or delivers a different point of view may have not been available in the questionnaire data due to the number of responses from a respondent type, e.g. a specific business sector.

A large volume of data was received and therefore the following chapters summarise the main findings and highlight pertinent differences between groups. A set of tables is available in **Appendix B.**

2.3.1 Late responses to the consultation

As determined by the 10 Local Authorities, a response was considered late if it was submitted after the deadline of 3 December 2020 at 23:59. Late responses were not counted in the final numbers of responses.

Four online responses, two hard copies and eleven emails were received shortly after the deadline of 3 December 2020 at 23:59 and have not been included in final number of responses. A brief summary of the verbatim responses can be found in Appendix A. All late responses have been passed to TfGM and the Local Authorities for their consideration.

2.4 Definitions

To analyse the data for this report, unless specified within the report, respondents have been grouped together as follows. Details of how respondents were grouped for additional analysis is shown in **Appendix A.**

2.4.1 Respondent Type

Table 2-1 Respondent Type

Respondent type	Description
General public	A personal response by an individual, the report will also refer to as the public and members of the public
Business / Businesses	A response on behalf of a business including anyone who is self-employed and / or a sole trader and includes taxi owners, drivers and operators
Representatives	An organisation* or a councillor / elected official

*An organisation includes but is not limited to schools, charities, social enterprise, trade organisations, government bodies.

2.4.2 Impacted vehicle

In the questionnaire respondents were asked whether they owned, leased or drive different types of vehicles and if so, whether they would have to pay a charge for any of the vehicle(s):

- **Impacted by vehicle ownership**: A respondent who owns, leases or drives at least one vehicle which they would need to pay a charge for, or they don't know if they would need to pay a charge. Any vehicle impacted by the clean air zone are described as **non-compliant.**
- **Not impacted by vehicle ownership**: A respondent who does not own or lease a vehicle which they would need to pay a charge for, either because they own a vehicle (or fleet of vehicles) which is compliant, or they do not own a type of vehicle which could be charged. All vehicles which will not be subject to a charge by the clean air zone are described as **compliant.**

2.4.3 Financially impacted by Covid-19

In the questionnaire, businesses, licensed taxi drivers, owners and operators and organisations were asked specific questions about the effect of Covid-19 and a respondent was defined as financially impacted or not as below:

- **Financially impacted by Covid-19:** A business, taxi driver, owner or operator, or organisation who has stated they have more debt or less savings or lower turnover or lower profitability as a result of the Covid-19 pandemic.
- **Not financially impacted by Covid-19:** A respondent who has stated they have either the same or less debt, the same or more savings, the same or higher turnover or the same or higher profitability as a result of Covid-19.

2.4.4 Hackney carriage and private hire vehicles

Hackney carriages are licensed to pick up people who wave for the vehicle to pull over and stop at the roadside or from an authorised taxi rank. Hackneys are often purpose built "black cabs" but don't have to be (depending on local licensing standards) and they may also do pre-booked work.

Private hire vehicles (PHVs) are only permitted to pick people up via a pre-arranged booking. This might be over the phone, on the web or using an app-based booking system.

In this document, if referring to a specific vehicle type, "hackney", "private hire vehicle", or its acronym “PHV” will be used. If referring to this form of public transport generally, "taxi" will be used.

3. Respondent Profile

3.1 Types of Respondent

A total of 4,768 responses were received to the consultation.

Table 3-1 shows the response by each type of respondent covering all response mechanisms.

Table 3-1 Type of Respondent

	Questionnaire**	Letter / email / telephone***	Total	%
General public	3,148	710	3,858	81%
Businesses (including self-employed and sole traders)	422	19	441	9%
Hackney and private hire vehicle (PHV) driver or operator	334	9	343	7%
Representatives*	91	33	124	3%
Total	**3,995**	**771**	**4,766****	**100%**

*Two respondents did not answer the question about the respondent type in the questionnaire.

**Representatives are a combination of 82 organisations and 43 councillors or another type of elected representative. Of the organisations, 52 completed the questionnaire and 30 responded by email, and 39 councillors or elected representatives completed the questionnaire and four responded by email.

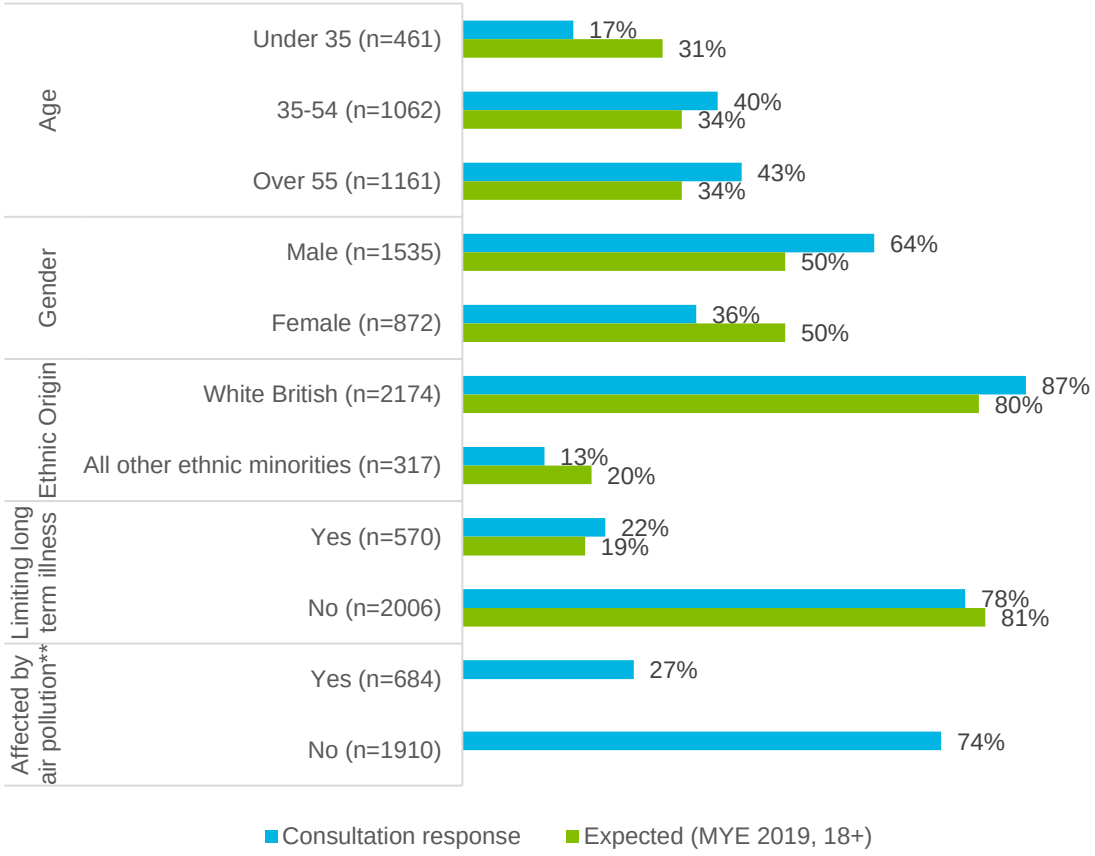
**One telephone response was received.

A list of organisations that responded to the consultation are shown in **Appendix E**.

3.2 Representativeness of response

Figure 3.1 illustrates the demographic profile of the general public who live in Greater Manchester and responded to the consultation, via the questionnaire, compared to census data for Greater Manchester.

Figure 3.1 Demographic profile for members of the public (%) *



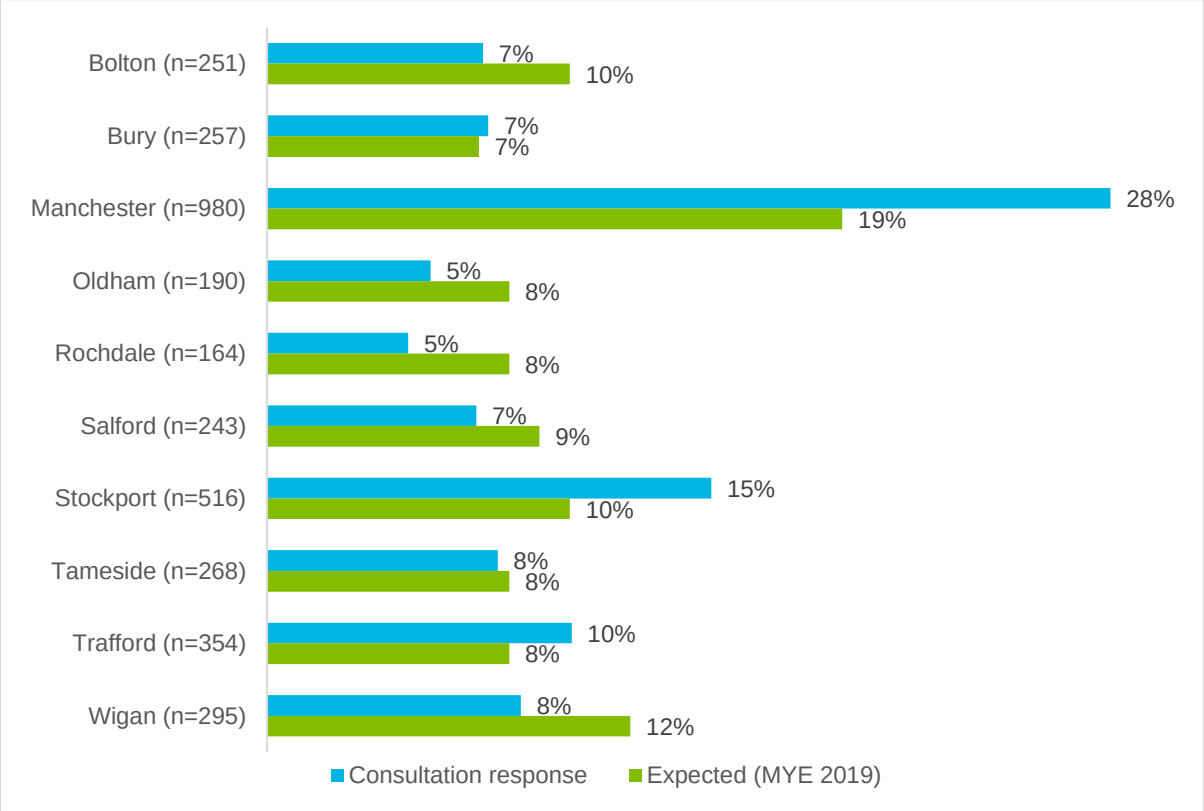
Base: All respondents who live in Greater Manchester
* Note: Prefer not to say and under 18 (n=13) removed from data for comparison purposes

Those aged under 35, have a lower representation compared to the GM population. Those aged over 35 have a higher representation compared to population statistics for Greater Manchester. Similarly, men and those of White British ethnic origin have a higher representation.

The response by the public by district is shown in **Figure 3.2**. A higher proportion of responses were received from Manchester, Stockport and Trafford than would be expected based on the mid-year population estimates whereas Bolton, Oldham, Rochdale, Salford and Wigan had a lower response than would be expected.

A further 277 (7%) responses were provided from outside Greater Manchester.

Figure 3.2 Local Authority profile for members of the public (%)

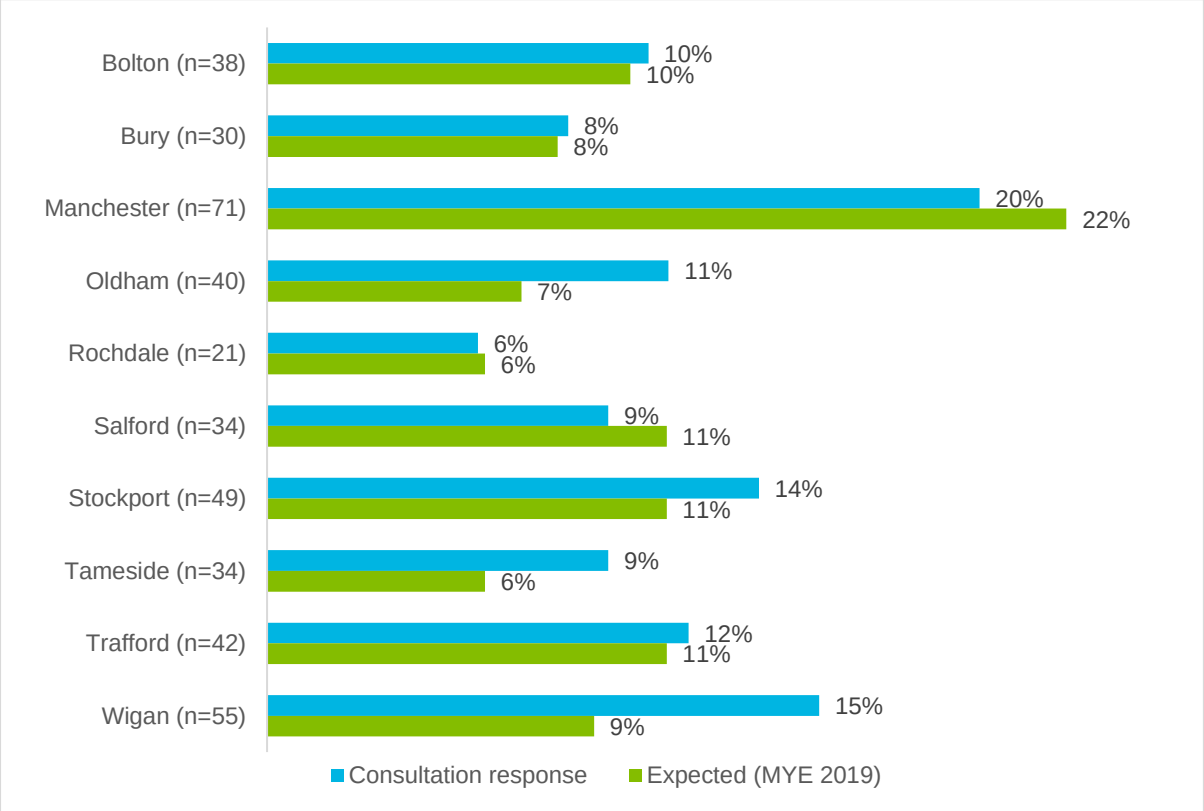


Base: General public who responded to the questionnaire or by email and live in Greater Manchester

3.2.1 Profile of businesses

Figure 3.3 illustrates the location of Greater Manchester businesses responding to the survey (excluding Hackney and PHV drivers which are discussed in section 3.2.2). The proportion of responses from businesses based in each Local Authority of Greater Manchester is similar to the ONS statistics for most areas. Manchester has the largest difference with 20% of businesses who responded based in Manchester compared to ONS statistics (22%). 77 businesses based outside Greater Manchester provided a response.

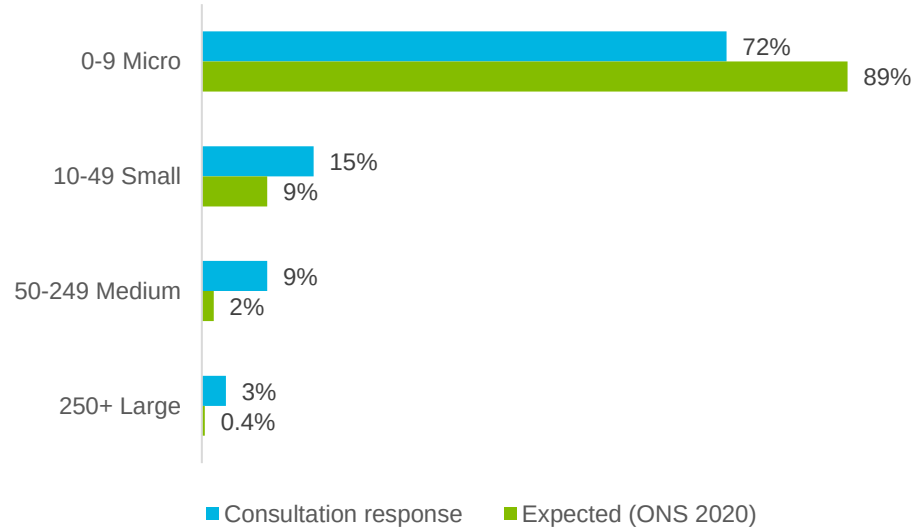
Figure 3.3 Local Authority profile for businesses (%)



Base: Businesses based in at least one Local Authority in Greater Manchester
Businesses may be located in more than one Local Authority

Businesses were also asked to provide information on their size (number of employees) and the sector they work in.

Figure 3.4 Business size (%)



Base: All businesses (n=422)

Most businesses who responded had less than 10 employees, however, this was still lower than the proportion of businesses in Greater Manchester which have less than 10 employees. All other business sizes provided a higher proportion of responses than represented than ONS statistics show would be representative.

The response from each business sectors is as follows:

- Construction (21%)
- Transport and storage (21%)
- Arts, entertainment, recreation and other (9%)
- Motor trades (9%)
- Agriculture, forestry and fishing (6%)
- Retail (6%)
- Manufacturing (6%)
- All other sectors (22%) *

Base: all businesses (n=397)
*Combined response for all sectors with less than 5% of total responses

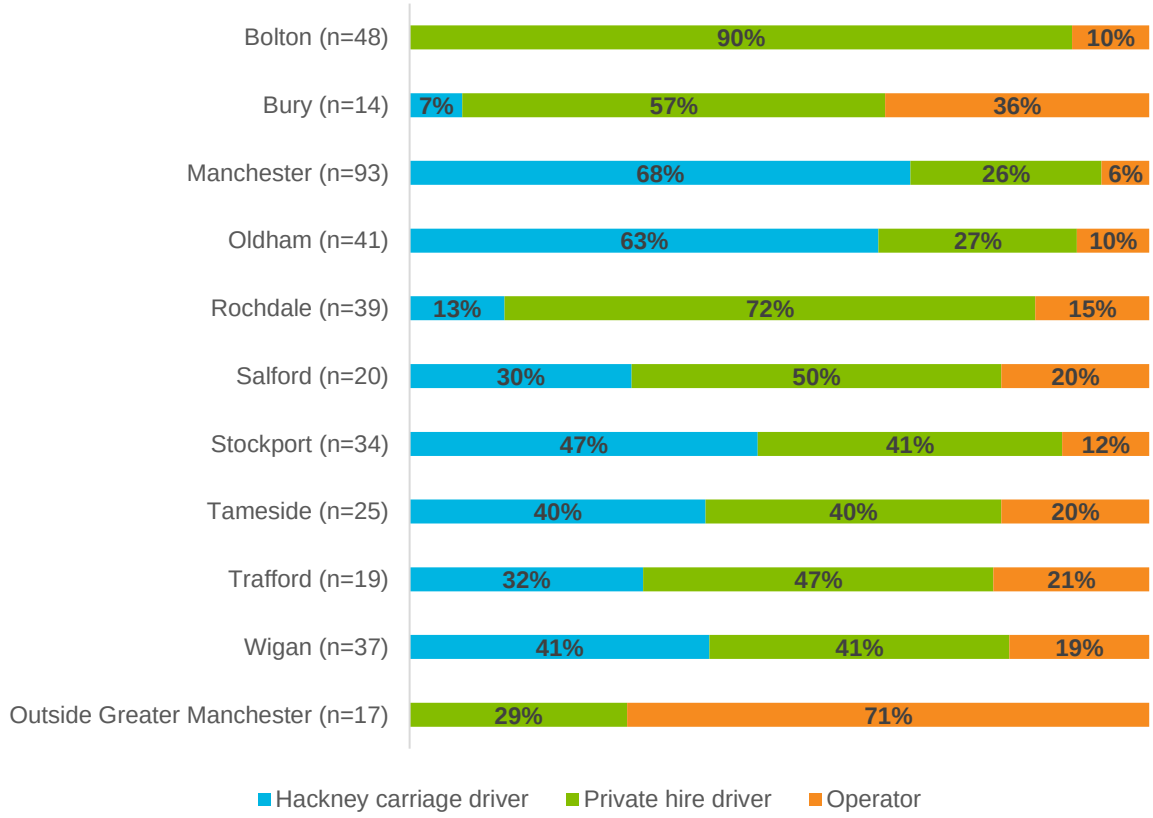
3.2.2 Profile of taxis

The profile of the taxi respondents is:

- Hackney drivers (44%)
- Private hire vehicle drivers (50%)
- Operators (7%)

Taxis who responded to the consultation are licensed in the following Local Authorities.

Figure 3.5 Licensed Local Authority of taxis (%)



Base:All taxi owner, drivers, operators
Taxis may be licensed in more than one Local Authority

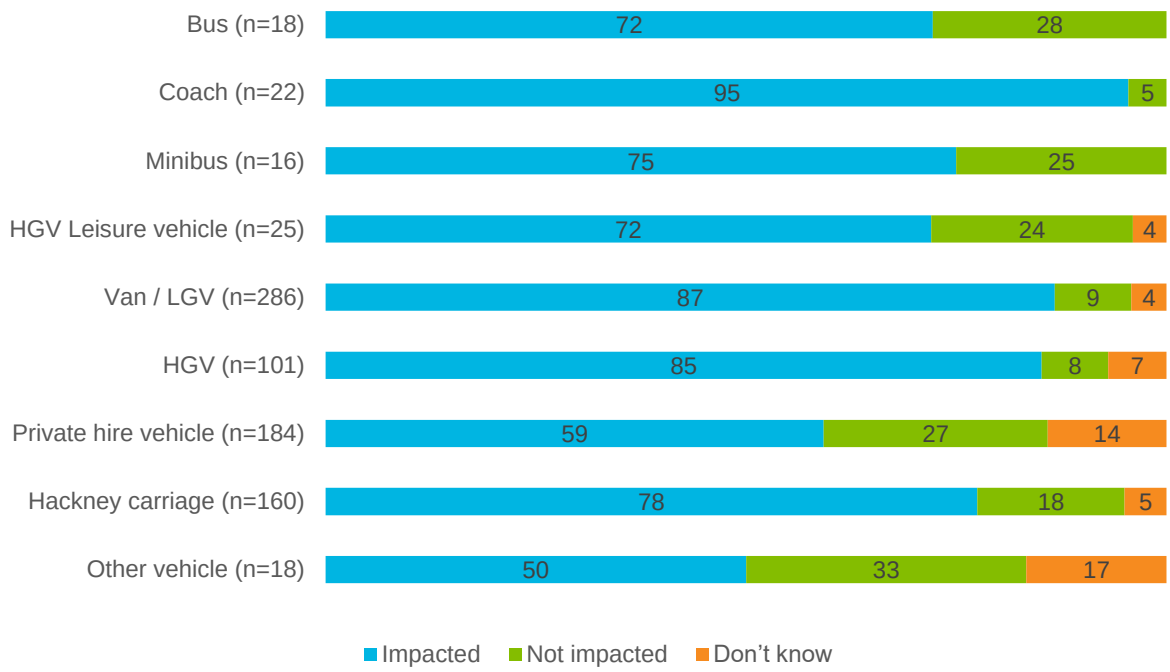
3.2.3 Vehicle ownership

3.2.3.1 Business vehicle ownership

Respondents were provided with a vehicle checker to enable them to ascertain if their vehicle(s) was likely to be compliant or not.

Almost all businesses (80%) had one or more vehicle that could be affected by the CAZ and would need to pay a daily charge for entering or travelling in it. Just 6% of these thought their vehicles were compliant. Four fifths (83%) of Hackney drivers and 74% of PHV drivers had vehicles that were non-compliant or did not know. For the purpose of this report, it is assumed those who stated they do not know if they would be impacted, will be impacted.

Figure 3.6 Impacted vehicles by vehicle type (%)



Base: All businesses including Taxis

3.2.3.2 General public vehicle ownership

Most of the public (87%) had access to a motor vehicle and 20% had at least one vehicle that could be affected by the introduction of the CAZ.

Of those affected the split by vehicle type is:

- Van / LGV (48%);
- HGV for leisure use (38%);
- HGV (6%);
- Minibus / bus / coach (7%) and
- Other vehicles (11%)

The main types of other vehicles referenced are campervans, motorhomes and horseboxes, while it is noted some respondents will have recorded their specialist vehicles as HGVs for leisure reasons.

4. Clean Air Zone: Boundary and Hours of Operation

Summary of findings

- Respondents were polarised in their views with many (mainly the public and representatives) agreeing with the boundary or wanting it to go further and include more roads such as the SRN.
- Others (mainly businesses) felt the boundary was too wide and should be concentrated on specific areas of high pollution or not introduced at all.
- Concerns were raised by neighbouring authorities about the boundary causing congestion and rat-running just outside the border as people try and avoid incurring a charge.
- The public was most likely to comment in support of the proposed operation time with businesses and taxi drivers concerned about being charged twice in a 24 hour period and suggesting the charging period did not run midnight to midnight to reflect night time shift patterns.

4.1 Introduction

This chapter provides the feedback from all respondents about the Clean Air Zone boundary and the timings the Clean Air Zone will be in operation.

4.2 Boundary

Respondents were shown the proposed Clean Air Zone boundary and asked to provide any comments they had on this. The consultation document included a description of the boundary as follows:



The proposed boundary of the CAZ would follow the existing administrative boundary of Greater Manchester as closely as possible, excluding the Strategic Road Network (SRN) which is managed by Highways England. The CAZ boundary has been set with the principle that signage would be clear so that vehicle drivers who do not wish to enter the CAZ can take an alternative route.

There is a proposal to exclude a small stretch of the A555 from the junction with the B5166 in the west to the junction with A523 in the east (from Styal Road to the Macclesfield Road junction). This is to enable movements between Poynton and Handforth (which are towns located in the district of Cheshire East), to continue uncharged, given the expectation that implementing a charge would result in local journeys returning to the roads that the A555 was designed to reduce.

4.2.1 Comments about the boundary

Just over a third of the public and representatives and a quarter of businesses provided a comment about the boundary. Responses were very polarised between those giving a generally positive comment; one third of members of the public, a quarter of businesses and half of the representatives who commented. Twice as many businesses raised concerns compared to those who commented in support of the boundary.

The table below shows the main comments made by each type of respondent. Not everyone provided a comment.

Table 4-1 Comments on the boundary

	General Public	Business	Representatives
Support the boundary	459	49	27
Concerns about the boundary	308	115	16
Suggested amendments*	699	78	13
Miscellaneous	117	25	4
Base	**1388**	**205**	**49**
Proportion of all respondents (%)	36	26	39

*The consultation identified two email campaigns (**see section 2.2.2** for details). This point was mentioned in the CAZ support group emails making up two thirds of these comments (n=484).

4.2.1.1 Support the boundary

The table below shows the most frequently given comments in support of the proposed boundary.

	General Public	Business	Represent-atives	Own impacted vehicle	No impacted vehicle
Zone / boundary / areas covered is fair / appropriate / reasonable	323	28	19	24	342
Include the Motorway/Strategic Road Network	56	5	4	9	50
Make the zone larger (North West / surrounding areas/general)	46	7	0	9	33
Make the zone larger (UK wide / national scale)	29	8	3	7	23
Include specific roads / areas	25	1	3	1	25
Base	**459**	**49**	**27**	**50**	**454**

Just under a quarter of the public and a little over a third of representatives who provided a comment felt the proposed **boundary is fair and appropriate** (n=323 and n=19 respectively). They tended to support the basis for the proposal that the population and therefore pollution is spread across Greater Manchester:

"This seems like a reasonable place to put the boundary as it is already a recognized boundary and unlikely that people could accidentally enter the zone without knowing." (Public, aged 18 – 34, Private Car)

"I think it's correct that it doesn't cover just the city centre area. There are high population densities throughout the area highlighted, which all need protecting." (Public, aged 18 – 34, Private Car)

"I feel this area is the right area as they are much more populated than surrounding areas therefore more cars are in Greater Manchester, so I agree with the proposed area." (Business, Minibus)

4.2.1.2 Proposals should go further

Some suggested the proposals should go further. Suggestions included:

Make the zone larger: The public, in particular (n=75) suggested air quality is not just a Greater Manchester issue and therefore the boundary should be extended. Some suggested it should be extended to surrounding areas whereas others felt it should be UK wide:

"This is a great start - But it will have little significant effect unless the other towns and boroughs around do not have a similar policy. The only saving grace might be that the Pennines will push the pollution from Yorkshire high enough to pass over Greater Manchester - if that is the case." (Public, aged 55+, Private Car)

"Why doesn't it go further, for the whole North West.... Or even the whole country? We need to be doing more" (Public, aged 18 – 34, No vehicle)

"If possible, this area should be expanded to cover an even larger area. If other councils were willing to be involved that would be beneficial." (Public, aged 18 – 34, No vehicle)

Some suggested Clean Air Zones across England should have consistent rules to ensure drivers understand how to travel across various regions with clean air zones in place:

"We would like CAZs across the UK to have consistent frameworks as it will be costly for us to adapt vehicles for different types of schemes in different cities which will add very significant cost to us….." (Business, LGV, HGV)

Include the Motorway/Strategic Road Network (Representatives n=4 and public n=56): Currently the boundary excludes the SRN, however some stated motorways should be included as a significant amount of polluting traffic is carried on the SRN through the region therefore excluding the SRN will reduce the effectiveness of the CAZ:

"Fully support this, it should also include motorways that run through the conurbation." (Councillor / Elected Official)

"It should include Motorways - need to lobby highways to include M56, M60, M62 and M602." (Public, aged 55+, Private Car)

"We would question the effectiveness of the scheme when the motorways and trunk roads within the scheme boundary are not included." (Business, Bus, Coach)

"As I understand it the proposals do not include motorways because they are run by Highways England. This is absurd. Pollution doesn't respect these distinctions" (Public, aged 55+, Other vehicle)

"Surrounded by motorways! This needs tackling too or will make little difference to air quality! Get heavy loads onto freight and tolls on motorways will cut needless journeys." (Public, aged 55+, Private Car)

Meanwhile, the focus groups picked up on the concerns from some respondents that excluding the SRN impacts the whole of the Clean Air Zone:

> *"So you've got a situation where somebody with an older van, driving down their own street could be charged, whereas somebody can drive that same van all the way across the region on the motorway, which goes right through urban areas and they're not charged?" (Focus Group: B9, LGV,)*

Include more roads / areas: The public in particular (n=25): made suggestions for other roads they felt should be included within the boundary:

- A6 (High Lane);
- A580;
- B5328;
- A555;
- M67 Woodhead Pass; and
- A626 Corridor.

Representatives from environmental groups including: Friends of the Earth, Client Earth and Clean Air Levenshulme generally agreed with the proposed boundary with some suggesting the proposals should include additional roads into the zone:

> *"The congested and illegally polluted A6 Stockport Road dissects the communities of Ardwick, Longsight and Levenshulme, which have some of the lowest car ownership in the whole of Greater Manchester according to the latest available Census data: 62.5% of households in Ardwick have no car or van, 50.3% in Longsight and 43.5% in Levenshulme. The Clean Air Zone should cover all vehicles, as private vehicles make up the majority of traffic on Manchester's busiest through-roads such as the A6 and Princess Parkway." (Organisation, Clean Air Levenshulme)*

> *"We agree Greater Manchester's CAZ charges should include the sections of the A628/A57 which form part of the Strategic Road Network, within the proposed CAZ boundary". (Organisation, Friends of the Earth)*

4.2.1.3 Concerns about the boundary

Concerns were raised about the boundary, particularly by businesses and taxis. Their concerns included:

	General Public	Business	Represent - atives	Own impacted vehicle	No impacted vehicle
Zone / area covered is too big	171	90	7	148	117
Will negatively impact people based on the GM boundary	91	23	5	85	30
Concerns about redistributing to surrounding areas (outside boundary)	79	8	7	31	57
Will negatively impact people travelling to and from Manchester Airport	3	2	1	1	4
Base	**308**	**115**	**16**	**235**	**193**

Zone / area covered is too big (public n=171; business n=90; representatives n=7): Many of those who gave a comment stated the boundary was too big and wanted to reduce the size of the boundary, stating it was too 'large', 'wide' and was deemed 'excessive'. Businesses with a van (n=48), HGV (n=17) and Taxis (n=29) commented on the size of the area. Several suggestions were given as to what they felt the boundary should be (see **Section 4.2.4)**:

> *"Not acceptable, too large." (Business, Hackney)*

> *"The area is much too large as it covers areas which do not suffer from high NOx and other pollution." (Business, LGV, HGV)*

> *"It is not right to include the whole of greater Manchester. The pollution levels are not the same in my town as Manchester city." (Public, aged 18 – 34, LGV, Private Car)*

> *"The area seems far too large. extending to a greater area seems to be done to catch more vehicles to be charged. Does not seem proportionate to the task." (Public, aged 35-54, Private Car)*

Respondents in the groups were surprised at the size of the area:

> *"I thought it would be for the sort of like inside the M60, I didn't realise it was the whole of the Greater Manchester area." (Focus Group: HGV / LGV, Agriculture, Construction)*

> *"I mean I thought they would more likely do the M60. Like the M60's a ring road, because looking at the map before, there wasn't much the other side, out of the M60. Wigan and Bolton and Bury. Yeah, poor old Bury Market, they're a bit stressed about this, because it's going to have quite an effect on them." (Focus Group: Minibus / Coach)*

Will negatively impact people based on the GM boundary (public n=91; business n=23): Businesses with vans (n=18), in particular, felt they would struggle if they had to travel across the boundary as they would not be able to pass on the charges to customers as this would make them uncompetitive against businesses outside the boundary:

> *"It makes sense to have the zone at the boundary of Greater Manchester however there should be some measures in place to help those small businesses that live just outside the boundary, but that drive to and work in Greater Manchester. I am based in Lancashire, but a lot of my work is in Wigan and Bolton and I will have to pay £10 extra for every job I do there. Ultimately, customers will not pay that extra on top of my fees, and I will end up with no business." (Business, LGV, Private Car)*

> *"We are based in Wigan area and it will hurt our business, while business based in Haydock less than 1 mile away will be able to undercut us and there is nothing we can do apart from spend a lot of money changing our vehicles which we can't afford with a pandemic that's already hit us for 70% reduction this year so far, which will take years to get back to normal from. I feel like packing in." (Business, LGV, Private Car)*

> *"I appreciate what you are doing but if like me you just live on the boundary and likely to drive no more than a mile in the zone before leaving it that seems unfair." (Public, aged 55+, LGV, Private Car)*

Members of the public (n=62) with an affected vehicle also raised this concern questioning its fairness:

> *"I live in north Derbyshire, for me to access the motorway network going north west or south I would have to get to the A555 via the A6 or the M67 via Glossop, so would be charged to access these when I'm not intending to access Manchester, not very fair." (Public, aged 35 – 54, LGV)*

In the focus groups some respondents mentioned the airport and whether charges would be incurred for accessing the airport from outside of GM. This coupled with the airport parking charges could result in an expensive journey to the airport:

> *"…Manchester Airport is located on the SRN, but access to the airport required motorists to use very short stretches of the local highway network. This could potentially result in a high charge for those who use very short stretches of the local highway network to enter the airport campus…" (Business, Bus, Minibus, LGV)*

> *"Yes, but is that going to be the same, because going into Manchester Airport, if you did it as soon as you came off the M56, there's also then narrow, you know, Greater Manchester roads." (Focus Group: B2, Minibus, Coach)*

Concerns about redistributing traffic / congestion / air quality problems to surrounding areas (outside boundary) (public n=79; business n=8): Concerns were raised the size of the boundary would cause a redistribution of vehicles to neighbouring districts.

> *"Concerns over impact on those areas just outside the CAZ - vehicles rerouting to avoid the zone and using unsuitable alternative routes" (Public, aged 35 – 54, Private Car)*

> *"Need to be careful that unwanted edge effects close to the boundary do not occur. Increased pollution just outside the boundary by services avoiding GM. Effects on local economy. Can areas adjacent to the GM boundary be invited to participate? May need measures to prevent other areas trying to take advantage of GM having higher costs to attract businesses away from GM." (Public, aged 55+, No Vehicle)*

Adjacent local authorities raised concerns the proposals will have a negative effect on those living just outside the boundary:

> *"Non-compliant vehicles may be moved from Greater Manchester into St Helens and therefore our residents will be subject to poorer air quality as a result." (Organisation, St Helens Council)*

> *"For example, notwithstanding our Bus Alliance agreements, there are risks that non-compliant buses, and also freight could be moved from depots and garages in Greater Manchester into adjoining areas, and for new and cleaner fleets to be moved into Greater Manchester to avoid CAZ penalties, again with unintended consequences." (Organisation, Liverpool City Region Combined Authority)*

Adjacent local authorities have also suggested changes to the boundary to avoid 'rat-running':

> *"It is considered that the current exclusion of the sections of the A57/A628 on the Strategic Road Network may lead to "rat running" of vehicles seeking to divert routes within High Peak to avoid a charge." (Organisation, High Peak Borough Council)*

> *"We have given considerable thought to local route-choice impacts of the proposed zone in the "Woodford peninsula"…. To save any confusion, it would be better if any areas south of the A555 were excluded from the proposed zone. We believe there are potentially significant re-routing impacts for local traffic between destinations within Cheshire East – for instance, Poynton to Handforth – which are disadvantaged by the CAZ purely as a consequence of the administrative boundary." (Organisation, Cheshire East Council)*

Neighbouring local authorities, One Bus and the operator Arriva also raised their concern about issues that will be caused by vehicles turning around along the border of CAZ, which could lead to congestion and further air pollution:

> *"There is a risk that some vehicles upon viewing the signage may seek to stop and re-route to try and avoid the charge. This could lead to disruption on the edge of the*

boundary and beyond in terms of traffic flow and associated impacts such as congestion, air quality, safety and noise." (Organisation, High Peak Borough Council)

4.2.1.4 Suggested amendments

The table below shows the most frequently given suggestions for amendments to the proposed boundary:

	General Public	Business	Represent - atives	Own impacted vehicle	No impacted vehicle
City centre should be a ULEZ	483*	2	1	2	1
Boundary should focus on city centre only / M60 boundary	122	51	3	99	74
Zone should just be those with poor air quality	67	26	9	35	59
Exclude specific roads / areas	23	4	1	12	15
Make different boundaries for different vehicles	21	1	0	16	6
Base	**699**	**78**	**13**	**153**	**145**

*The consultation identified two email campaigns (**see section 2.2.2** for details). This point was mentioned in the CAZ support group campaign emails making up two thirds of these comments (n=484) [please note one email from the CAZ support group did not include a comment about ULEZ].

A few suggestions were made for amendments to the boundary.

Boundary should focus on city centre only / M60 boundary (public n=122; business n=51; representatives n=3): Thoughts were that the boundary should focus on the city centre, M60 ring road or concentrate on areas that currently suffer from poor air quality:

"It should be in central of Manchester only as it is in London, Birmingham and other cities." (Business, Hackney)

"Far too large, should restrict to Manchester City Centre." (Public, aged 35 – 54, Private Car)

"From my point of view if they made the M60 the boundary and gave us say ten years that would make it something that we could work towards, rather than just throwing in the towel. You know where you'd only pay if you went inside the M60." (Focus Group: Minibus, Coach)

Zone / areas covered should just be those with poor air quality / city centre and towns / high-risk areas (public n=67; business n=26; representatives n=9): Some also suggested the zone should only be targeted to high pollution areas:

"It's too large an area and the problem area are clearly in the built-up conurbations. If this has to be implemented, then it should be far more targeted at areas with specific high pollution issues not a blanket rule across the whole of GM much of which does not have a problem with traffic-based pollution" (Business, LGV)

"This is too large. Should be inner city only" (Councillor / Elected Official)

City centre should be a ULEZ: Just over a third (n=483) of the public, a group which was predominately made up of the CAZ support group campaign, felt the city centre should be made into an Ultra-Low Emissions Zone:

"I call for ….. an Ultra-low emission zone (ULEZ) in Manchester City Centre which includes all polluting vehicles - as unanimously supported by Manchester councillors in January 2020." (CAZ support group)

Access to the Airport: One local authority made the following suggestion:

"If the proposal were to proceed based on the boundaries as consulted, then we recommend that there is a further case for the length of A6 MARR between Styal and the Airport to be excluded from the charging regime. This would give Cheshire East residents a toll-free route to Manchester Airport, particularly by taxi, whether for business travel or for leisure. This would allow taxi's registered in Cheshire East serving the communities of Poynton, Handforth, Wilmslow and beyond to continue to trade without being disadvantaged. We consider access to the international airport is a key requirement of many local businesses and we do not wish to see this access curtailed by the proposed clean air zone. As a comparator, we note the Airport Spur and Motorway network through GM is similarly excluded, thus enabling charge-free access to the airport from within Greater Manchester." (Organisation, Cheshire East Council)

4.3 Hours of operation and management of the scheme

Respondents were given the following information:

The Clean Air Zone would operate 24 hours a day, seven days a week, signage would be used to clearly identify the Clean Air Zone, and the daily charges would apply from midnight to midnight.

Around a third of the public and representatives and a sixth of businesses provided a comment about the hours of operation. Over half of the public and representatives generally supported the operation times whereas two thirds of businesses suggested amendments to the operation times.

The table below shows the main comments made by each type of respondent. Not everyone provided a comment.

Table 4-2 Comments on the operation times

	General Public	Business	Representatives
Support the operation times	856*	16	21
Oppose the operation times	126	32	2
Suggested amendments to operation times	235	61	11
Concerns about operating times	158	26	3
Miscellaneous	35	4	5
Base	**1332**	**129**	**39**
Proportion of all respondents (%)	35	16	32

* The consultation identified two email campaigns (**see section 2.2.2** for details). This point was mentioned in the CAZ support group campaign emails making up half (n=484) of these comments.

4.3.1 Support the operation timings

	General Public	Business	Represent - atives	Own impacted vehicle	No impacted vehicle
Support the proposed operation times	856*	16	21	19	387

*The consultation identified an email campaign, from two environmental groups (**see section 2.2.2** for details). This point was mentioned in the CAZ support group emails making up half (n=484) of these comments.

The public and representatives gave mostly supportive comments about the operation timings (n=856 and n=21 respectively). The majority of respondents who supported the proposed operation times (n=387) did not own an impacted vehicle:

> *"I support the proposed Clean Air Zone (CAZ) scheme that covers all ten Greater Manchester boroughs and is in operation 24 hours a day, 7 days a week." (CAZ support group email)*

> *"This sounds good to me, air pollution is harmful at any time of day" (Public, aged 18-34, No vehicle)*

> *"I agree that this works best. Pollution doesn't operate by a clock so make the restrictions 24 / 7 and over time reduce limits to force improvements in emissions" (Public, aged 35-54, Private Car)*

> *"Not before time. Delighted that it will be 24 / 7 to avoid time shifting of vehicle use / deliveries if operation did not include the night hours." (Public, aged 55+, Private Car)*

> *"No we need the whole day covered otherwise polluting vehicles when possible would use the free time for deliveries etc." (Public, aged 55+, Private Car)*

4.3.2 Oppose the operation timings

Comments made against the operation timings included:

	General Public	Business	Represent - atives	Own impacted vehicle	No impacted vehicle
Oppose the proposed operation times	125	31	2	63	95
Unfair to those who do not spend long within the boundary	2	1	0	1	2
Base	**126**	**32**	**2**	**64**	**96**

Respondents who owned a business (n=31) commented against the operation times along with some members of the public (n=125). Those who opposed were generally against the Clean Air Plan and viewed it as a money-making scheme that would negatively affect businesses and see charges passed onto the consumer:

> *"Not really a clean air zone then! congestion charge because why is it going to run 24/7 when CO_2 levels will be within the legal limits at certain times." (Business, Hackney)*

4.3.3 Suggested amendments to operation times

A few suggestions for the operation times are detailed below:

	General Public	Business	Represent - atives	Owner impacted vehicle	Not owner impacted vehicle
Do not charge for evening / night journeys / only charge in daytime	105	22	5	49	82
Change the hours of operation to peak times/hours only	66	27	5	45	50
Do not charge for weekend travel	44	13	2	39	19
Only be charged once within a 24-hour period	31	7	0	15	23
Midnight should not be the end / start between 24-hour periods	8	1	1	2	6
Base	**235**	**61**	**11**	**131**	**170**

Timing exclusions: (public n=105; business n=22; representatives n=5): About a quarter of the public who commented on timings stated evenings should not be included and approximately half again stated weekend travel should not be included. The rationale for excluding evening and weekends was their view that traffic levels are lower during these times and this would help to provide businesses with an alternative time to travel. The majority of these comments were from the general public who owned at least one impacted vehicle:

> *"I think the charges should be reduced or removed during the night and on Sundays. At such times, traffic is generally free-flowing and therefore not as polluting as during the day especially at peak travel times." (Public, aged 55+, Leisure HGV, Private Car)*

> *"The clean air zone charges should not apply at certain off-peak hours (e.g. 2200-0500) to encourage the businesses/vehicles that cannot afford to/will not upgrade to travel at night when there are fewer people about to inhale exhaust fumes in the short-term. This will also encourage businesses to stay off the roads at busier times and help to reduce congestion." (Public, aged 18 – 34, Private Car)*

> *"I think it should not operate after 7pm on a Mon. Tue. Wed. Thurs. and Sunday." (Business, Hackney)*

Members of the public who owned at least one impacted vehicle (n=21) suggested the Clean Air Plan should only operate during peak hours during the week, where they felt the majority of the pollution was caused due to commuting traffic:

> *"I think the clean air zone should only operate at peak times when a lot of cars are on the road so people would use public transport to get to work, 24 hours a day is not fair on everyone." (Business, Hackney)*

> *"24 hours a day seems a lot given the pollution levels would be highest at peak times (7-10am, 3-7pm). A more focused zone would seem optimal." (Public, aged 35-54, Private Car)*

> *"Whilst more complex to administer it would be "fairer" if it only applied at peak hours e.g. 0700-0900 and 1600-1800" (Public, aged 55+, LGV)*

The Federation of Small Businesses (FSB) also reported its members did not feel the CAZ needed to operate 24/7:

"70% of businesses said the CAZ did not need to be a 24/7 scheme. A number of businesses made the point that pollution levels were less at the weekend and should therefore not apply then, or outside of peak pollution times even during the week to give people options." (Organisation, FSB)

Times of operation: The proposed operation hours caused concern over the application of charging, with many querying or concerned a single journey could be charged twice. For example, travel just before and after midnight. These concerns were particularly raised by businesses (n=7) including taxi drivers and night-time economy businesses. Many suggested 4am would be a more appropriate changeover time to fit with most nightshifts:

"We support the 24/7 nature of these proposals. However, we would urge Greater Manchester to ensure that only one payment occurs per rolling 24-hour period. This is to avoid double charging those using the GM road network between 2359 and 0001 from incurring double charges for a single journey. This is particularly an issue for the night-time economy, and for businesses such as the airport that are used overnight." (Business, Bus, Minibus, LGV)

"As a member of a Peak District Mountain Rescue Team our operational area come into Greater Manchester and we do get tasked by Greater Manchester Police & Greater Manchester Ambulance Service. I and other team members have 'non-compliant' vehicles. Given that a callout may go past midnight and team members often travel in their own vehicles, this could equate to a £20/non-compliant team member - just to carry out our voluntary lifesaving work. The midnight-midnight charging is of particular concern for voluntary search & rescue team members do to the often-unsocial hours of our callouts. If no exemptions are made this would be particularly punitive, rather than rolling 24hr periods" (Public, aged 35-54, LGV, Private Car)

"If I'm working at night and overnight, i.e. from 9pm until 3am, then I'm going to get charged twice for the one shift? That will eat into my income, especially when those times are the main shifts I do. (Depth Interview: Hackney Driver)

"We believe a midnight to midnight 'charging day' would disproportionately impact taxi and private hire vehicles… As an alternative, we believe the Clean Air Zone 'charging day should apply from 4am-4am." (Business, Private Hire Operator)

4.3.4 Concerns and queries on practicalities

Some concerns were raised about the proposals including:

	General Public	Business	Represent - atives	Own impacted vehicle	No impacted vehicle
Concerns about signage / need to provide clear / easily visible signs	93	13	1	17	89
Concerns about the implementation / enforcement of the CAZ	62	10	2	13	56
Queries about the proposals: times of operation	7	5	0	7	5
Base	**381**	**87**	**14**	**87**	**14**

Concerns about signage (public n=93; business n=13; representatives n=1): Respondents stated the signage of the clean air zone should be clear and should give enough warning about entering the zone:

> *"Signage should be present far in advance of the boundary" (Public, aged 18-34, Private Car)*
>
> *"you will need to make them clear for visitors from outside GM" (Public, aged 18-34, Private Car)*
>
> *"However, new signage is notoriously difficult to notice first time around so effort must be taken to make signage stand out as much as possible, and you should provide a settling in period for drivers." (Business, No Vehicle)*

Implementation and enforcement (public n=62; business n=10; representatives n=2): Respondents had concerns about the implementation/enforcement of the clean air zone such as:

- How will non-UK registered vehicles be made to pay?
- How will it be enforced?
- What methods will be used to track those entering the Clean Air Zone? e.g. ANPR
- How will people pay / How will payment be ensured?
- What happens when the air quality has improved – will the charges be reduced / removed?

> *"How will not UK registered vehicles be captured and force to pay?" (Public, aged 55+, Private Car)*
>
> *"How will this [be] monitored? How will the monitoring be able to differentiate between different types of vehicles? Can a company without compliant vehicles pay a monthly/yearly fee (like a license) for its fleet to travel unrestricted within the CAZ? Can 1 vehicle travel in and out of the area multiple times within 24 hours for just 1 charge?" (Business, LGV, HGV)*
>
> *"The payment mechanism needs to be carefully planned and must be enforced." (Public, aged 35-54, Private Car)*
>
> *"Is this going to be charged through like a daily charge with cameras involved to pick up vehicles?" (Business, Van)*
>
> *"But I use my van for personal trips though? Am I going to be penalised for those trips also?" (Focus Group: LGV)*

5. Charges and Exemptions

5.1 Charges

Summary of findings

- Views on the proposed daily charges vary, businesses felt charges for all vehicles are too much. The public were divided but slightly more felt the charges are about right or too little.
- Typically, 40% of the public felt charges for each type of vehicle type were too much and 50% felt the charges were either about right or too little.
- Bus charges were the exception for the public with 52% feeling they were too much and 38% about right or too little. Those aged under 35 were more likely to feel the charges are too little or about right and those aged over 45 that the charges are too much.
- More businesses felt the charges for Vans / LGVs and HGVs were too much than the charges for other vehicle types.
- More taxi drivers / operators felt charges for hackney carriage and private hire vehicles were too much than the charges for other vehicle types.
- Comments included concerns that the daily charge would be passed on to the customer.

Respondents were informed of the proposed daily charges in the consultation document:

Clean Air Zone: Daily Charges	Daily charges would apply for each day a non-compliant vehicle is used within the GM CAZ, with one charge imposed per vehicle, per "Charging Day" (midnight to midnight), however many journeys the vehicle makes within the GM CAZ in that 24-hour period. • Hackney carriages – £7.50 • Private hire vehicles – £7.50 • Buses – £60 • Coaches – £60 • Minibuses – £10 • Vans – £10 • HGVs – £60 Owners or registered keepers of non-compliant vehicles used within the GM CAZ will be required to pay the relevant charge via a central Government payment portal. Government intends that a user can pay 7 days in advance, including the journey date (Charging Day), up to 7 days in advance after the journey date including the journey date (Charging Day).

5.1.1 Views on the proposed daily charge overall

All respondents were asked to state whether, in their opinion, the charges were too much, about right, or too little for each type of vehicle that may be charged. They were then asked to provide any additional comments on the charges.

Table 5.1 shows a summary of views about the amount proposed as a daily charge by respondent type for each vehicle.

At least a third of the general public thought the charges were too high for all vehicle types. In particular, they thought the charges were too high for buses (52%) and coaches (43%).

Three quarters of businesses felt the charges were too high for HGV (74%) and LGV (75%), but over half thought they were about right or too little for hackney carriages and PHVs (62% and 63% respectively).

Table 5-1 Views of the proposed daily charge

Vehicle Type	Respondent type and base	Too much (%)	About right (%)	Too little (%)	Don't know (%)
Bus	General public (n=3003)	52	29	10	9
	Businesses (n=593)	72	14	5	9
	Representatives (n=80)	35	43	13	10
Coach	General public (n=2786)	43	36	12	9
	Businesses (n=511)	70	16	5	9
	Representatives (n=75)	28	45	16	11
HGV	General public (n=2943)	40	31	22	8
	Businesses (n=554)	74	13	6	8
	Representatives (n=77)	29	36	26	9
LGV	General public (2977)	40	33	21	6
	Businesses (n=584)	75	16	5	4
	Representatives (n=83)	37	48	10	5
Minibus	General public (n=2944)	38	38	17	7
	Businesses (n=540)	71	17	5	6
	Representatives (n=80)	33	50	9	9
Hackney carriage	General public (n=2965)	40	33	19	7
	Businesses (n=607)	73	13	8	5
	Representatives (n=80)	31	48	13	9
Private hire	General public (n=2969)	41	33	20	6
	Businesses (n=592)	73	14	9	4
	Representatives (n=80)	34	45	11	10

Base: all respondents

Members of the public aged 35 and over were more likely to feel the charges were too much compared to those under 35.

Members of the public who live in Manchester, Salford or Trafford were more likely to state the proposed charges are generally about right, compared to respondents who live in Bolton, Bury, Oldham, Rochdale and Wigan who felt charges are too much.

Many respondents responded differently for the different types of vehicle however, several respondents gave the same response for all vehicle types:

Those who felt the daily charge for every vehicle type was too much were:

- 22% of the general public;
- 32% of businesses; and
- 34% of respondents who owned at least one impacted vehicle.

Those who felt the daily charge for every vehicle type was about right or too little were:

- 25% of the general public;
- 5% of businesses; and
- 28% of respondents who did not own at least one impacted vehicle.

5.1.2 Views on the daily charges from those who own or drive an impacted vehicle

Table 5-2 shows the opinion of respondents who own any impacted vehicle on every daily charge. The table shows, apart from the daily charge for coaches (69%), at least 70% of those who own any impacted vehicle feel all the charges are too high. For each charge, a respondent who owns an impacted vehicle is more likely to feel a daily charge is too high compared to a respondent who does not own an impacted vehicle.

Table 5-2 Views on each proposed daily charge from vehicle owners (%)

£ value of charge is:	Bus	Coaches	HGVs	Van / LGVs	Minibus	Hackney carriage	Private hire vehicles
Too much	86	85	91	82	66	93	87
About right	2	0	4	13	26	3	9
Too little	10	8	4	3	3	2	1
Don't know	2	8	1	2	5	2	3
Base	**42**	**26**	**136**	**580**	**38**	**159**	**176**

Many of the comments received were about the daily charges in general and not vehicle specific. These are described in the next section. Following this specific comment received for each vehicle type are discussed:

- Bus (Section 5.1.4);
- Coach (Section 5.1.5;
- HGV (Section 5.1.6);
- Van / LGV (Section 5.1.7);
- Minibus (Section 5.1.8); and
- Hackney carriage and Private Hire Vehicles (Section 5.1.9).

5.1.3 Comments about the charges in general

Although each charge was for a specific vehicle, many respondents commented generally about the proposed daily charges, and these are summarised as an overview of respondents who supported or opposed the charges and other suggestions.

Table 5-3 Comments about charges

	General Public	Business	Representatives
Support the Charges	709	21	5
Oppose the charges	608	246	10
Other suggestions	128	23	6
Miscellaneous	194	35	12
Base	**1536**	**297**	**29**
Proportion of all respondents (%)	40	38	24

5.1.3.1 Support the charges

General comments supporting the charges in general included:

	General public	Business	Represent-atives	Own an impacted vehicle	No impacted vehicle
Support the proposed charges / they are good / fair	593*	4	2	8	105
Charges are too low / should be higher (general)	84	7	3	7	86
Charge should be higher for travelling during peak times	41	10	0	12	39
Base**	**709**	**21**	**5**	**29**	**250**

* The consultation identified two email campaigns (**see section 2.2.2** for details). This point was mentioned in the CAZ support group campaign emails, making up half (n = 484) of these comments.

Support the proposed charges (public n=593; business n=4; representatives n=2): Those supporting the charges felt they were high enough to encourage change without being too impactful on those unable or unwilling to change:

> *"They seem about right. Need to have a good incentive, and the 'carrot and stick' model that's proposed sounds reasonable." (Public, aged 18-34, Private Car)*

> *"I think that the lead in time for the charges and financial incentives should enable large vehicle owners (buses, HGV etc) to act to ensure their vehicles are compliant. If they do not do so, then the charges are rightly high, and a disincentive to continued use. Similarly, I think the £10 charge should apply to all light vehicles." (Public, aged 55+, Private Car)*

> *"So, I think it's good, because as part of what the Government is doing or how they can, because they can't necessarily control people's actions, but maybe a charge will. "So, I think it's good, also if I'm thinking about it from the angle of my health as well, you know what areas are clean as well, so I think that's really good in that instance, yeah." (Focus Group: Public aged 18-34)*

Some thought the charges were too low and felt they needed to be higher to act as a deterrent:

"Charges need to be higher to discourage vehicles with high emissions from using Manchester roads. There should be a higher amount for within the city centre ring road, as the emissions in the city centre as way above the dangerous level. I had a carbon monoxide test after walking through Piccadilly Gardens last year and was too high a level." (Public, aged 35-54), Private Car)

Charges are too low / should be higher (public n=84; business n=7; representatives n=3): Of all the comments received about charges, some of the public commented charges should be higher, including some who felt private cars should be included. This is discussed more in **section 8.4.**

"The charges should be as high as possible to deter going in the area. Health & climate change are two of the most critical issues of our time. Private cars should definitely be included as well." (Public, aged 55+, Private Car)

"Not enough. Should be about 100 times higher. Disgraceful that you aren't charging private cars." (Public, aged 18-34, No Vehicle)

"I think it's strange because there's so many more people, there's so many more cars and HGVs and vans for driving into town and I thought you're meant to be encouraging the people, not just the businesses. It feels like you're targeting just businesses, rather than individuals and I think it's the individuals that need to actually do the groundwork and we all need to contribute, it's not really going to have any effect on people, really." (Focus Group: Public aged 18-40)

Charge should be higher during peak times (public n=41; business n=8): Some suggested a tiered system based on the time of day to encourage travel during quieter hours in order to lessen congestion related pollution:

"Perhaps there should be a reduced charge for through the night to spread deliveries out." (Public, *aged 55+, Private Car*)

"I am generally in favour though would prefer a scheme that discouraged travel during peak hours more. This must be when most pollution is generated during slow moving traffic." (Public, aged 35-54, Private Car)

Other comments about the charges: Concerns were raised by the public that the largest businesses could afford the charges, but smaller businesses could not, meaning small businesses would struggle:

"Leave the small businesses alone they cannot afford to pay more money to you. The large businesses will have some way of not paying it…" (Public aged 55+, Private Car)

"It will put an additional cost to small companies that cannot afford to buy a new fleet of vehicles or a new van/car unlike large corporations so it will impact small businesses/ self-employed disproportionately to larger companies." (Public aged 18-34, Private Car)

"Big Companies with lot of vehicles… should pay more as they have lot more money and with lots of vehicles, they create significant amount of pollution. Local small companies or self-employed should pay the current proposed amount." (Public aged Under 18, No Vehicle)

"Big businesses with fleet will just be able to add this on to their overall job costs, many of who will not be travelling through GM regularly. The self-employed/sole traders with vehicles affected, who are also GM residents, again will be most affected…." (Public aged 18-34, Private Car)

5.1.3.2 Oppose the charges

General comments opposing the charges in general included:

	General public	Business	Represent-atives	Own impacted vehicle	No impacted vehicle
Oppose the proposed charges / disagree with the charges	414	156	7	257	316
Differences between charge amounts is unfair	258	112	2	190	182
Charges are too high / should be lower (general)	10	5	2	5	12
Base	**608**	**246**	**10**	**452**	**510**

Oppose the proposed charges (public n=414; business n=156): Over one-third of the comments received were from businesses against the charges, and some members of the public were concerned about the impact the charge would have on businesses and taxi drivers:

> *"The classes are too vague / indiscriminate. A delivery driver whose van barely stops running all day is a world of difference from a person who owns a small van for recreational use such as carrying their pet dogs or bicycles etc. Or going camping at weekends. A lot of factors in this country prohibit people from owning more than one vehicle, so anybody who falls into the type of category I've just described is very likely to also drive that same small van to work each day. The environmental impact of doing so is no worse than driving the average normal car, so to pay a charge under these circumstances would not be acceptable in my eyes." (Public, aged 18-34, Private Car)*

> *"Forget these crippling charges, these are essential vehicles using the city, you need to be looking at none essential vehicles and the probability of banning them altogether. Maybe access only and providing more public transport and park and ride schemes." (Business, PHV Operator)*

> *"£0 would be appropriate across all classes. The Greater Manchester Public Transport system does not work unless you are going into the City Centre. The network of EV charging points is woefully inadequate. The cost of EV charging is becoming punitively expensive currently more than double the actual cost. Sort out the above, make cycling safe, encourage the railway companies to take bikes - 3 per train is woeful- allow electric scooters and resolve the issue by people not using cars voluntarily. Do not persecute the people who have no other option available to make a living." (Business, LGV, Private Car, Other Vehicle)*

> *"My concern is the timescale and I think it is unfair to target industries like us, without targeting cars and all the other vehicles, because they're the ones that cause all the problems, we all see it. Hundreds of cars with one person in and they're paying nothing." (Focus Group: Minibus, Coach)*

Differences between charges is unfair (public n=258; business n=112): Some respondents suggested the charges were not fair based on business size, others felt the charging structure needed simplifying:

> *"The prices are not relative. You can't charge [a large bus operator] the same price as a private bus." (Public, aged 35-54, Private Car)*

> *"You're charging too many types of vehicles. Charge a single fee to commercial vehicles. Simple." (Organisation, Anonymous, Minibus)*

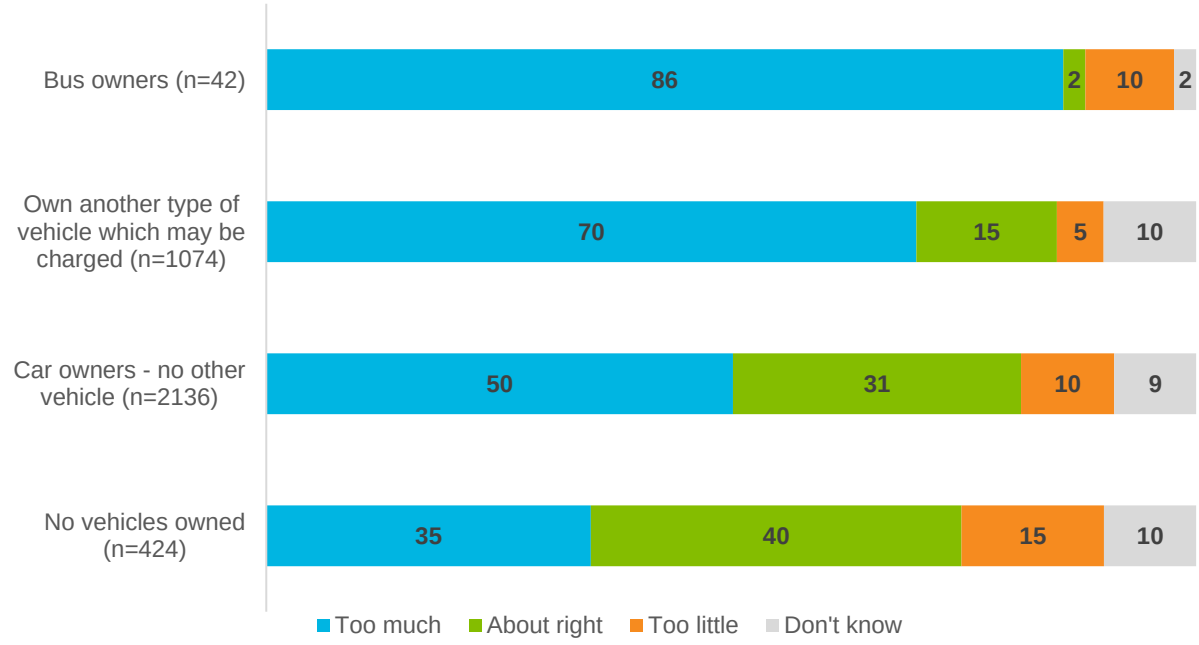
5.1.4 Daily charge for buses

Under the proposals, non-compliant buses will be subject to a £60 daily charge.

Table 5-1 Views of the proposed daily charge above shows half (52%) of the public felt the charges were too high and businesses generally felt the charge was too much (72%). Representatives were more in favour of the charge with (56%) stating it was about right or too little.

Figure 5.1 shows **Bus owners felt the charge was too much (86%).** It also shows those with other affected vehicles thought the charge was too much (70%). However, those who do not own any type of vehicle thought the charge was about right or too little (55%).

Figure 5.1 Opinions on the level of charges of bus by vehicle owners



Base: all respondents

5.1.4.1 Comments about the daily charge for buses

Specific comments relating to the daily charge for bus included:

	General public	Business	Represent -atives	Own impacted vehicle	No impacted vehicle
Charges are too low / should be higher for – buses	13	2	1	4	12
Charges are too high / should be lower for – buses	75	17	3	19	70

Charges are too high / should be lower (public n=75; business n=17): When commenting on the bus charges specifically, most comments were about the charge being too high. The general view was the charge was too high for buses given buses are public transport and respondents felt air quality can be improved through the increased use of public transport:

> *"I think that buses and coaches should be cheaper as they are encouraging people to use public transportation instead of using individual transport." (Public, aged 55+, Private Car)*

> *"I also think that buses should be charged more as they go through [the boroughs] many times a day whereas an HGV/coach may only do one trip into the area." (Public, aged 18-34, Private Car)*

> *"I'd recommend charging bus companies as much as it's theoretically possible. £60 on the amount that they earn per day might be a drop in the ocean. It might not be enough to make them change their habits." (Public, aged 18-34, No Vehicle)*

> *"Bus charges should be lowered, as sustainable affordable transport should be supported. Maybe an incremental slower raise to bus charges could be put in place to allow them to adjust." (Business, LGV)*

> *"I think buses should be little or no charge to encourage public transport use and reduce traffic levels." (Public, aged 55+, LGV, Private Vehicle)*

Some members of the public raised concerns that charges would be passed on to the passenger through increased fares, and this view was supported by a representative:

> *"Too much for coaches and buses. This charge will be pushed on to the consumer." (Public, aged 35-54, Private Car)*

> *"We are concerned that with the current commercial operating regime for bus services, the level of charge will have a consequential negative impact upon those using bus services, such as some of our patients and visitors on lower incomes and also some of our key worker staff. Whilst buses are a source of pollution at a greater proportion per vehicle, they provide the opportunity to transport large numbers at greater efficiency." (Organisation, The Northern Care Alliance NHS Group)*

Charges are too low / should be higher (public n=13): Although 39% of the public thought the bus charges were about right or too low, very few commented on their reasons why:

> *"Assuming these charges are per day and per vehicle these seem fair for taxi and small passenger vehicles but quite light for buses which can carry a large number of people." (Public, aged 35-54, Private Car)*

> *"There is no excuse whatsoever for buses and coaches exceeding the levels, so if they do then the charges should be much higher. As a cyclist I see buses pumping out disgusting fumes on Oxford Road every day." (Public, aged 35-54, Private Car)*

Very few bus operators commented. Those that did stated:

> *"Buses & coaches should have a cheaper charge as they significantly reduce traffic on the roads, cars should have a much higher cost." (Business, Bus, Coach, LGV)*

> *"We recognise the daily charge for non-compliant buses has been reduced from £100 per day to £60 per day but still consider this charge to be too expensive if there is any shortfall in the funding stream or delay in the programme to retrofit. Some buses - particularly for education movements or TfGM supported services operate for as little as two hours per day and this charge will make those contracts more expensive to operate or be resolved by fare increases, which seems counterproductive." (Business, Bus)*

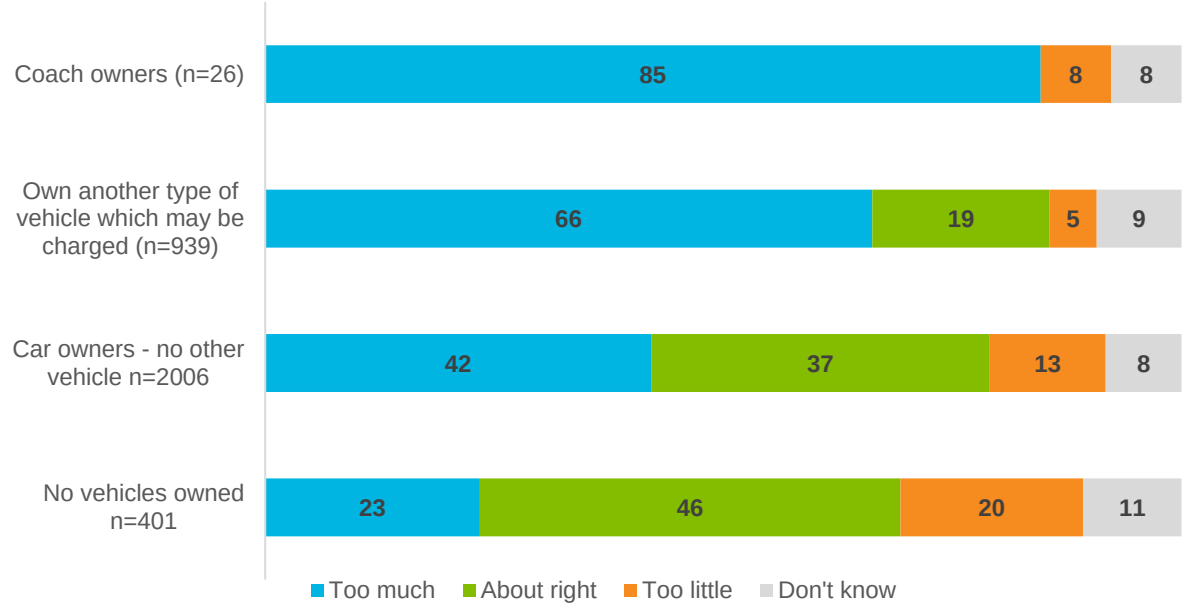
5.1.5 Daily charge for coaches

Under the proposals, non-compliant coaches will be subject to a £60 daily charge.

Table 5-1 Views of the proposed daily charge above shows 43% of members of the public felt the charge for coach was too high, which is less than for buses (52%). Similarly to buses, businesses generally felt the charge was too much (70%). Representatives were more in favour of the change with 61% stating it was about right or too little.

Figure 5.2 shows **Coach owners felt the charge was too much (85%).** It also shows those with other affected vehicles thought the charge was too much (66%). However, those who do not own any type of vehicle thought the charge was about right or too little (66%).

Figure 5.2 Opinions on the level of charges for coach of vehicle owners (%)



Base: all respondents
Caution should be used where base is small (n<50)

5.1.5.1 Comments about the daily charge for coaches from different types of respondent

Specific comments relating to the daily charge for coaches included:

	General public	Business	Represent - atives	Own impacted vehicle	No impacted vehicle
Charges are too high / should be lower for – coaches	28	9	0	10	26

*There were little or no comments about coach charges being too low.

Charges are too high / should be lower: The public (n=28) provided most of the comments about the proposed daily charge for coaches:

> *"Coaches help with tourism and of course football fan transport. Keep them cheaper." (Public, aged 55+, Private Car)*

> *"Coaches and buses take multiple cars off the road adding this charge will increase fares and therefore push people back to private cars." (Public, aged 18-34, Coach / LGV, Private Car)*

> *"For coaches travelling in for events the charge seems a bit high as they may only take one trip in an out of the zone and do very little driving around." (Public, aged 18-34, No Vehicle)*

Very few coach operators commented. Those that did (n=7) felt the charge was too high:

> *"Why charge so much for those vehicles i.e. buses and coaches which can keep cars off the road due to their multi occupancy? and charging HGV which have to deliver to*

factories etc which aids employment. If they must be charged why so much?" (Business, Coach)

"Each of our EURO V vehicles touch several major towns and cities daily. As such, each vehicle if non-compliant, would be liable for charges of up to £100 per day per city. If just three charging zones were touched, it could easily lead to charges exceeding £200 per day, which would substantially alter our cost base and our current value proposition, in an exceptionally price sensitive market. Many of our customers would simply travel less, if they had to pay higher fares, or in some cases would not feel able to travel at all, leading to significant service cuts and reducing valuable and affordable public transport capacity for residents and visitors." (Business, Coach)

Many of the coach businesses involved in the focus groups felt the charge was too much and would take what little profit, if any, they made from their current contracts:

"You've not got the £60/day in your contract to just lose, we just haven't got it. We're not being pathetic and just saying it, it's actually true. We haven't got that much profit in them contracts, there's not a lot of profit in them to begin with." (Focus Group: Minibus, Coach)

"We're basically staying afloat with the school's contracts like the other guys are. We are just covering our costs really. The school's contracts don't really bring in any sort of profit, if any, but with the private work going as well and we don't know when it's coming back, we're all in the same boat really." (Focus Group: Minibus, Coach)

5.1.6 Daily charge for HGVs

Under the proposals non-compliant HGVs will be subject to a £60 daily charge, some leisure vehicles such as horseboxes and motorhomes also fall under this category.

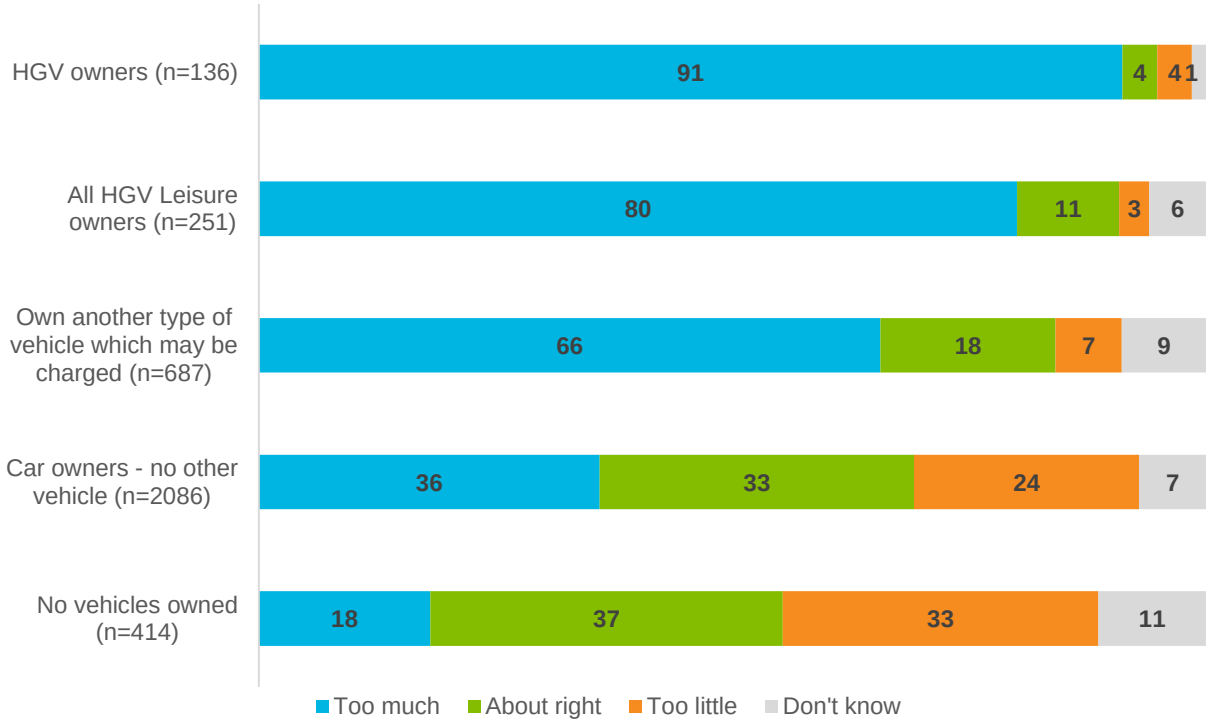
Table 5-1 Views of the proposed daily charge above shows half (53%) of the public and 72% of representatives felt the charges were about right or too little. However, three quarters of business (74%) thought them too high.

Figure 5.3 shows **almost all (91%) of HGV owners and HGV leisure vehicle owners (80%) felt the charge was too much** compared to:

- 18% of respondents who do not own a vehicle;
- 36% of respondents who do not own an HGV and only drive a car; and
- 66% of owners of other impacted vehicles.

The figure also shows those without an affected vehicle were more in favour of the charge for HGVs with 57% of those with a car only and 70% of those with no vehicle stating the charge was about right or too low.

Figure 5.3 Opinions on the level of charges of HGVs of vehicle owners (%)



Base: all respondents

5.1.6.1 Comments about the daily charge for HGVs

Specific comments relating to the daily charge for HGVs included:

	General public	Business	Represent-atives	HGV owners impacted	HGV leisure owners impacted
Charges are too low / should be higher for – HGVs	27	1	1	0	1
Charges are too high / should be lower for – HGVs	14	14	3	7	3
Charges are too high / should be lower for - private leisure vehicles	57	2	3	1	40

Charges are too low / should be higher: The public commented mostly about the charge for HGVs being too low (n=27):

> *"HGVs are owned by such large companies, they should be charged more. As many have said, the issues concerning the environment lies with large corporations." (Public, aged 18-34, Private Car)*

> *"The charges for goods vehicles are too low. There are loads of dirty diesel vans and lorries on the roads and the charges will not be a big enough incentive. Bus and coach charges are ok but wouldn't want to drive people from these forms of transport, thereby causing more traffic." (Public, aged 35-54, Private Car)*

> *"I think HGVs should be charged at a higher rate, as they do not have the same environmental benefits as bus use but are charged at the same rate." (Public, aged 18-34, Private Car)*

Charges are too high / should be lower: Nearly all businesses who commented specifically about HGVs explained why they thought the charge was too high, since they do not have the profit margins to be able to afford the proposed charge (n=14):

> *"We do feel the charges for HGV's are still too high at the rate of £60 per day. This is an additional potential cost of £360 per week, or £18,000 per vehicle per year which is impossible for a contract haulier in our industry to make back based on their current earning capacity and available driving time. It will simply drive any operators that are unable to afford to change to Euro 6 vehicles out of business. This will also have a significant negative impact on our business as we cannot afford to cover the cost of these charges for them and the construction businesses operating in the region are highly unlikely to accept that they should be paying for it either." (Business, Private Car)*

> *"I think these charges are ridiculous. Living inside the boundary means I'm going to have to find 70£ a day before I even turn a wheel (60 for my truck and 10 for my van). That's £350 if I work 5 days. How can I pass this on to my customers?" (Business, LGV, HGV)*

> *"The average return on a national transport journey with a price of around £330 would be around £10. Journeys into Manchester, due to our closest location…. would be much less than that and achieve a lower return, so that you can see that we would need to run at a loss if we paid the charge. We would need to pass that charge to our customers so businesses in Manchester would receive an additional bill of £10 - £20k pa for their deliveries or around 20% of their current charges" (Business, HGV)*

Representatives stressed the impact of the proposed charge on those they represent:

> *"We would urge you to consider keeping any charge to HGV's as low as possible and to look at all measures to support businesses who are vital to your local economy. These vehicles are delivering essential goods, services and responding to carefully timed delivery slots. We would highlight the decision taken by Birmingham City Council to reduce the cost to £50 for HGVs and suggest this charge be applied in the Greater Manchester CAZ as well. If costs are too high this could curtail the sector's ability to move to zero emission transport at pace once this new technology becomes available." (Organisation, BVRLA)*

> *"The profit margin for hauliers is 2% (Source: Statistica 2020), which equates on average to a per week margin of £60pw per HGV. A daily charge of £60 per non-compliant HGV is therefore not absorbable - leading to the operator either not entering the CAZ (and so risk disrupting the supply chain) or passing the cost on" (Organisation, Road Haulage Association)*

In the Focus Groups respondents added:

> *"Yeah, because obviously an HGV wagon, you don't buy a new scaffolding wagon, anyway, do you know what I mean, they cost a fortune, but anything above like a 15 plate at the minute, you're going into like 20 grand and things, so I think I'll just hold back for five months. If I get money off it and it's going to reduce the charges that I'm going to be getting, because like I say, I could have nine vehicles out a day, one's an HGV and that's going to cost me £150 a day, it's dearer than my fuel, that." (Focus Group: LGV, HGV)*

Charges are too high / should be lower for private leisure vehicles: A high number of comments (n=40) were received from those with HGVs used for leisure purposes particularly those with horseboxes.

Most of these respondents commented they did not use their vehicles very often and therefore did not feel they were large contributors to air pollution. They also made a number of comments about the potential impacts to them which are described in **section 8.5**:

> *"I understand why businesses should be expected to pay but I think it is harsh to impose such high daily charges on private vehicle owners. Many of us cannot possibly afford to replace our vehicles and they are used lightly and rarely, not contributing anything like the damage that daily use by big businesses does. This system penalises poorer people who cannot replace or upgrade vehicles, while wealthier people, who can afford to upgrade also do not have to pay the charge. As always, the wealthy suffer least. Please consider a private leisure vehicle exemption, or at the very least significant reduction to make the use of horseboxes financially viable for those of us who work incredibly hard to fund a hobby which is good for mind body and soul." (Public, aged 35-54, Leisure Vehicle, Private Car)*

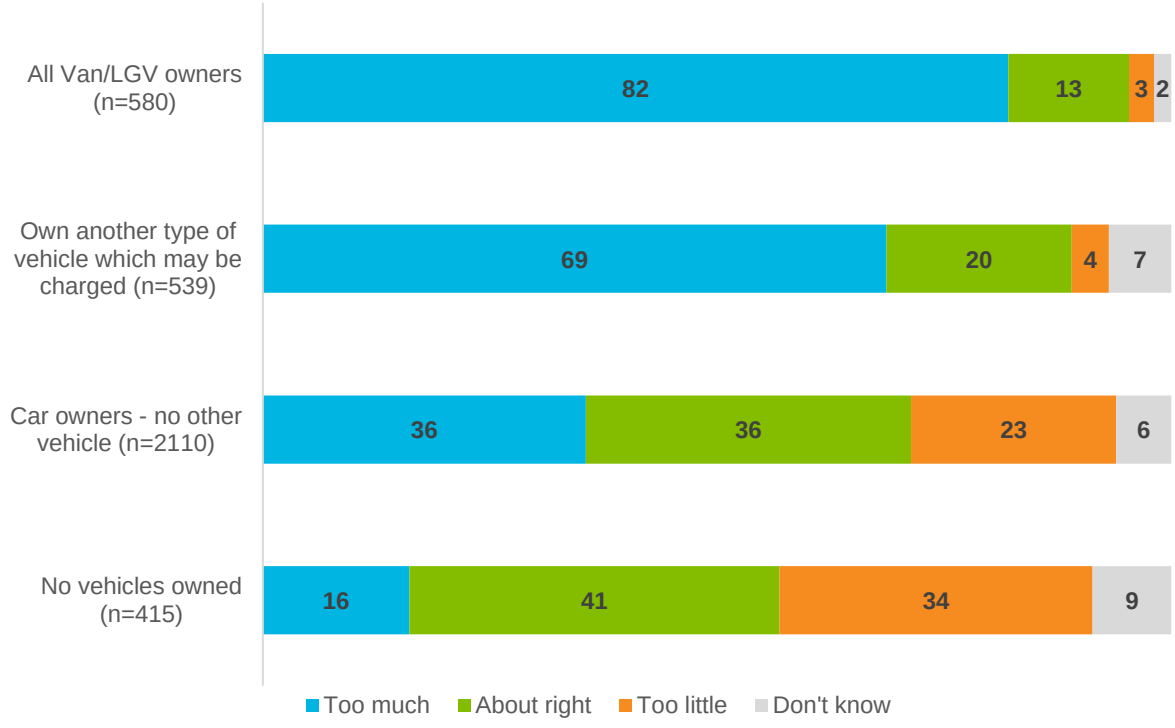
> *"The charge means I just won't go into the region. I won't attend some of the riding schools there and I now won't go to the garage that I have gone to for years because he is in Urmston so I would be charged. It is a lot of money, but other people will lose out too." (Focus Group: Public Owners of HGVs)*

5.1.7 Daily charge for vans / LGVs

Under the proposals, non-compliant vans / LGVs will be subject to a £10 daily charge. As with other vehicles, members of the public (54%) and representatives (58%) were more likely to state the charge is about right or too little while businesses felt the charge was too much (75%). (See Table 5-1 Views of the proposed daily charge).

Van / LGV owners felt the charge was too much (82%), while those who own cars or do not own a vehicle are more likely to feel the charge is at least about right (59% and 75% respectively).

Figure 5.4 Opinions on the level of charges of vans / LGVs of vehicle owners (%)



Base: all respondents

84% of the public who own a van / LGV felt the charge is too much which compared to 35% of the public who do not own a van / LGV.

5.1.7.1 Comments about the daily charge for vans / LGVs from different types of respondent

Comments about the daily charge for vans / LGVs included:

	General public	Business	Represent-atives	Van/LGV owners impacted
Charges are too low / should be higher for – LGVs	14	1	1	0
Charges are too high / should be lower for – LGVs	21	18	1	22

*11 of the impacted vehicles are owned by the public

The public provided slightly more comments about the charge being too high (n=21) than too low (n=14) which reflects the fact half of those providing a comment had a non-compliant vehicle. Nearly all comments from businesses were that the charges are too high.

Charges are too low: The members of the public who thought the charges were too low (n=14) were concerned about the perceived increase in the use of vans and the amount of miles they do:

> *"Given the significant increase in delivery vans expected over the coming years as retail increasingly shifts to online sales and doorstop delivery services, it's important we take action to minimise the increasing pollution this will cause. Providing there is sufficient financial support available to small traders (but not large delivery fleets), I would support a higher charge to encourage a faster uptake of low emission vans." (Business, No Vehicle)*

> *"£10 is too little for vans as you want to encourage them to be more efficient in their movements. £10 per day is probably too little to make a huge difference." (Public, aged 35-54, Private Car)*

> *"Vans should be charged more. This will encourage more innovation around getting deliveries into the Clean Air zone." (Public, aged 35-54, Private Car)*

Charges are too high: The affordability of the daily charge was a concern for those feeling the charge is too high (public n=21; business n=18):

> *"I have to pay £60 a week as working on my van 6 days a week when incomes are under £200 and can't afford difference of £5000 to change a van for euro 6." (Business, LGV)*

> *"I run a small company with 1 small van a tax of £200 a month would put me out of business." (Business, LGV)*

> *"I feel the charge on vans is exceptionally high and will adversely affect small businesses who have already been hit hard due to Covid. We must also remember that all of these charges will be passed onto the general public (Public, aged 35-54, Private Car)*

> *"I think £10 a day is too much to ask at a time when van owners probably can't upgrade their van straight away." (Business, No Vehicle)*

The following quote from the focus groups highlights concerns around the charges for van owners:

"Well, somebody who's a small builder or has their own small business, that's £50 a week in that van, that's £250 a month on top of your road tax and all the other taxis." (Focus Group: LGV)

5.1.8 Daily charge for minibuses

Under the proposals non-compliant minibuses will be subject to a £10 daily charge. There were 43 respondents who stated they owned a minibus of which five chose not to answer the question about charges. Of those that did, 66% felt the charge is too much. Over two-thirds (71%) of business owners state the charge is too high, while in comparison, members of the public and representatives are more likely to state the charge is about right (55% and 59% respectively).

The number of comments received specifically about the minibus charge are shown below. All except 14 minibus owners owned another type, usually a van / LGV or a private hire vehicle.

	General public	Business	Represent - atives	Own impacted vehicle	No impacted vehicle
Charges are too high / should be lower for – minibuses	11	2	0	3	10

Charges are too high: Minibus owners did not provide any comments specifically about the daily charge and the public tended to reference their views on minibuses with other types of vehicles.

"They seem to penalise public transport and favour private taxis. That said, I think the charges for taxis, private hire and minibuses could put people out of business. At the very least they will increase fares and so the end user, people who are perhaps least able to afford it, will be the ones bearing to cost." (Public, aged 35-54, Private Car)

"It would be good if the vehicles that are carrying multiple occupants (e.g. buses, minibuses, taxis) pay less than HGVs, vans etc." (Public, aged 35-54, Private Car)

"Why on earth would you charge buses and minibuses who reduce the need for cars on the road and reduce the overall emissions by carrying lots of people at once." (Business, Minibus)

5.1.9 Daily charge for hackney carriage and private hire vehicles

Under the proposals, non-compliant hackney carriage and private hire vehicles (PHV) will be subject to a £7.50 daily charge.

The data for hackney and private hire vehicles is being shown together as some respondents did not differentiate the two types of taxi both from the evidence of the views on the level of the daily charge and the comments received.

The response for both hackney carriage and private hire vehicles is close to identical with just over half the public feeling the charge is about right or too little for hackney (52%) and PHV (53%). Almost three quarters (73%) of businesses felt the charge was too high for both types of vehicle (See Table 5-1 Views of the proposed daily charge).

Most hackney carriage owners (93%) and private hire owners (87%) felt the charge was too much.

Table 5-4 Views on the daily charge for hackney carriages and private hire vehicles

Vehicle ownership	View on the daily charge	Hackney charge	PHV charge
Owners of a hackney carriage *(base: hackney n=159, PHV n=133)*	Too much	93%	81%
	About right	3%	11%
	Too little	2%	2%
Owners of a private hire vehicle *(base: hackney n=99, PHV n=176)*	Too much	86%	87%
	About right	6%	9%
	Too little	7%	1%
Owners of a vehicle that may be charged *(base: hackney n=1117, PHV n=1098)*	Too much	69%	69%
	About right	17%	16%
	Too little	9%	9%
Car owners who do not own another vehicle *(base: hackney n=2117, PHV n=2123)*	Too much	39%	39%
	About right	35%	35%
	Too little	19%	20%
No vehicles owned *(base: hackney n=418, PHV n=420)*	Too much	20%	20%
	About right	42%	43%
	Too little	28%	30%

Base: All respondents; Don't know excluded from the table

Each type of vehicle has been analysed separately however the results are very similar for both types of taxi:

- Almost all (93%) of hackney carriage drivers thought the charge was too much compared to 69% of other vehicle owners;
- While 87% of private hire vehicle drivers felt the charge for PHVs was too much compared to 68% of other vehicle owners;
- Those who do not own a vehicle feel both charges are too low or about right (62% hackney carriage charge and 63% for the PHV charge); and
- There are no significant differences between the views on charges when comparing hackney carriage and private hire owners directly.

5.1.9.1 Comments about the daily charge for hackney carriage and private hire vehicles from different types of respondent

Comments received about the proposed daily charge for hackney and PHV vehicles included:

	General Public	Business	Represent-atives	Hackney impacted	PHV impacted
Charges are too low / should be higher for – hackneys	43	2	0	0	0
Charges are too low / should be higher for – PHV	42	1	1	0	0
Charges are too high / should be lower for – hackneys	26	14	1	7	3
Charges are too high / should be lower for – PHV	22	18	0	2	7

Charges are too low: Twice as many comments were made from the public about charges being too low for each type of vehicle (hackney carriage n=43; private hire n=42), compared to the number of comments stating they were too high (hackney carriage n=26; private hire n-22):

"Taxis and private hire should pay £10. They do lots of miles around the town centres so should pay more." (Public, aged 35-54, Private Car)

"Taxis are the only vehicles that should be charged as they are constantly going none stop." (Public, aged 18-34, Private Car)

Charges are too high: Some comments were received from PHV and hackney carriage drivers stating the charges are too high for their respective vehicle type (n=7 each). Some of these respondents felt the charge was too high including suggesting it could result in drivers losing their livelihoods:

"The charges are too much and to pay £7.50 per day £52.50 per week is a vast amount out of your wage every week. You are getting penalised for trying to make a living" (Business, Hackney)

"The industry is already struggling. Drivers won't have that sort of money. This will force some of them to leave the industry." (Business, Hackney)

"That's extortion to be honest how on earth hard working drivers will be able to pay these ridiculous charges when it's hard to put food on table and paying bills. When overheads are already suffocating Hackney trade and no means of fair competition this would be last nail in coffin for sure" (Business, Hackney)

"The charges for taxi are high, due to the business inflation It is not possible to afford £7.50 a day. Sometimes we are not able to make £20 for whole day and pay 7.50 for clean air, what is left for us." (Business, PHV)

Members of the public who specifically commented charges were too high for hackney carriages (n=26) and private hire vehicles (n=22) were concerned the charge would be passed on to them:

"They are much too high for private taxis and hackney carriages, they will not reduce emissions only serve to punish an already struggling industry and its customers." (Public, aged 18-34, Private Car)

"Charging taxi drivers, a further £7.50 is going to hit them hard every time they have to enter these areas which will increase costs for customers, or they will lose custom. 60 pounds for buses and coaches is a disgrace. At the very time we should be encouraging public services you are going to force people back into their own private cars where there will be no increase in costs." (Public, aged 35-54, Private Car)

"I don't think any vehicle should be charged. Taxis and private hire vehicles with pass on the charges to their customers." (Public, aged 35-54, Private Car)

"These charges will all be passed on to passengers/consumers. Some will affect small companies/individuals e.g. taxi drivers. £7.50 a day is almost £40 for a five-day week for them - how are they supposed to manage to pay this???" (Public, aged 55+, Private Car)

"My first thought was like taxis and buses, they're like huge vehicles and I don't think that the companies are going to pay to upgrade them and you know people that are like taxi drivers, if they've got their own taxi, maybe they can't afford to upgrade it to something that's suitable. So, they're probably just going to keep paying the charge every day and that's probably just going to get passed on to the people that pay for the services." (Focus Group: Public, aged 18-34)

The taxi trade organisations explained why they feel the charge is too high:

> *"As trade we consider that these charges are high particularly taxi drivers are unable to pay these charges trade is already on its knees if they are going to work as taxi driver his first priority will be bring the food on the table and kept the roof on his family's heads." (Organisation, NPHTA)*

5.1.10 Suggested amendments for the proposed daily charges

Comments were also received giving alternative suggestions for the charging structure.

	General public	Business	Represent-atives	Own impacted vehicle	No impacted vehicle
Charges should be dependent on the emissions of the vehicle	61	8	2	12	58
Charges should be based on mileage	21	4	2	13	12
Charges should be paid for weekly / monthly / annual rather than daily	17	3	1	8	13
Charge only those who travel in / around city centre most frequently	12	5	1	10	7
Charges should be the same amount for all affected vehicle types	14	2	0	4	12
Charges should be dependent on the size of the vehicle	12	2	0	4	10
Base	**128**	**23**	**6**	**46**	**107**

Charges should be dependent on the emissions of the vehicle (public n=61; business n=8; representatives n=2): Respondents commented that rather than charging on the age of vehicles, a fairer system would be to charge based on the amount of pollution the vehicle causes:

> *"There should be a charge for private vehicles with emissions greater than those produced by a small car. Possibly an additional charge for cars with diesel engines." (Organisation, Marple Energy Saving Strategy)*

> *"Perhaps cheaper or more expensive rates dependent on the quality of the vehicle, to encourage companies to* get greener vehicles." (Public, aged 55+, Private Car)

Members of the public (mainly), made some other suggestions for ways to calculate a charge including **charging by mileage** (n=21) or **frequency** (n=12), **charging based on vehicle size** (n=12) and the **charge should be the same for all vehicle types** (n=12):

> *"A standard charge is it the way ....if there has too be a charge it should be based on the mileage of each vehicle in the area I could drive 3 miles s day and pay the same as a vehicle doing 8 hours continuous." (Business, Hackney)*

> *"Charge vehicles a higher rate if they are going to be in congested zones. You're pricing an entire community out. Or is this targeted to discriminate against private owners?" (Public, aged 18-34, Leisure HGV, Private Car)*

> *"A car derived van/small light goods vehicle should not pay as much as a Mercedes sprinter or Volkswagen Crafter. Any van which is available in standard car form i.e. 2 front seats, 3 back seats - should not come under the same band as a bigger van." (Public, aged 35-54, LGV)*

> *"A daily charge is too much, what about season tickets?" (Public,* aged 55+, Private Car*)*

A small number of respondents (public=21; business=4; representatives=2) suggested that mileage per vehicle could be taken into consideration, one representative commented on the difference between deliveries and a tradesperson:

> *"Given this is an area which has boomed in the pandemic, consideration should be given to a special 'local delivery' or 'courier' category. This recognises there is a significant difference in impact between a tradesperson driving to a job once and leaving the vehicle parked up for the day, and a courier which drives all day long. Under the current proposals both would be subject to the same £10 charge. Consideration could be given to requiring that all local delivery vehicles, often referred to as 'last mile' are electric sooner than other commercial vehicles. Local delivery companies could also be supported to accelerate the establishment of localised distribution hubs supported by e-cargo bikes." (Councillor / Elected Official)*

5.1.11 Queries about the proposals

Although details were provided in the consultation documents some of the general public (n-85) and business (n=18) responses contained a query about the charges. These queries were regarding:

- How the money from the charges is to be used;
- Clarity on how the charges were developed / agreed;
- Clarity of whether these charges are for the day or every time to enter / re-enter the zone; and
- How the charges will be managed e.g. disputes over charges.

5.2 Exemptions and discounts

Summary of findings

Permanent local exemptions:

- 68% of the public, 55% of businesses and 77% of representatives were in agreement.
- Those who commented tended to focus on a specific type of vehicle they agreed or disagreed with e.g. disabled tax class vehicles or specialist HGVs. Those who oppose the permanent local exemptions stated that all vehicles contribute to air pollution.

Temporary local exemptions:

- 64% of the public, 54% of businesses and 67% of representatives were in agreement.
- Those who commented and broadly agreed felt the extra time being given to upgrade was fair, while a high proportion of comments from businesses stated there wasn't enough time to upgrade.

Permanent local discounts:

- 44% of the public, 46% of businesses and 57% of representatives agreed with the permanent local discounts with one third of the public disagreeing.
- 65% of HGV leisure owners and 54% of private hire vehicle owners agreed with the discounts.
- Some private hire drivers who agreed, did so with a caveat that this should only be available to private hire drivers licensed in Greater Manchester.
- Most of those who disagreed commented that discounts are not needed or have concerns that the system may be abused.

5.2.1 Permanent local exemptions

The following explanation was provided in the questionnaire along with a reference to the consultation document for further information.

Greater Manchester are proposing permanent local exemptions for Clean Air Zone charges for specialist vehicles, vehicles entering Greater Manchester due to a road diversion on the motorway network and vehicles used for the purposes of a disabled person which are exempt from vehicle tax.

The vehicle types which are currently proposed to have a permanent exemption are:

Vehicle type	Description
Specialist Heavy Goods Vehicles	Certain types of heavily specialised HGVs, such as certain vehicles used in construction or vehicle recovery.
Non-road going vehicles	Certain types of non-roadgoing vehicles which are allowed to drive on the highway such as agricultural machines; digging machines, and mobile cranes.
Vehicles used by emergency services	Certain types of vehicles used by emergency services front line emergency and certain non-emergency vehicles.
Community Minibuses	Those operating under a permit under section 19 or section 22 of the Transport Act 1985, issued by a body designated by the Secretary of State.
Showmen's Guild vehicles	Fairground / funfair vehicles which are registered with the Showmen's Guild.
Driving within the zone because of a road diversion	Vehicles driving within the zone because of a road diversion who would otherwise not have entered the GM CAZ. Applies only while the diversion is active and subject to non-compliant vehicles being on the designated diversion.
Disabled Tax Class vehicles	Vehicles used by, or for the purposes of a disabled person which are exempt from vehicle tax.

Each respondent was asked about the extent of their agreement with the permanent local exemptions.

More respondents agree with the permanent local exemptions than disagree with members of the public and representatives more inclined to agree than businesses or taxis. Figure 5.5 Extent of agreement with permanent local exemptions (%) shows the level of agreement for each type of respondent.

Figure 5.5 Extent of agreement with permanent local exemptions (%)

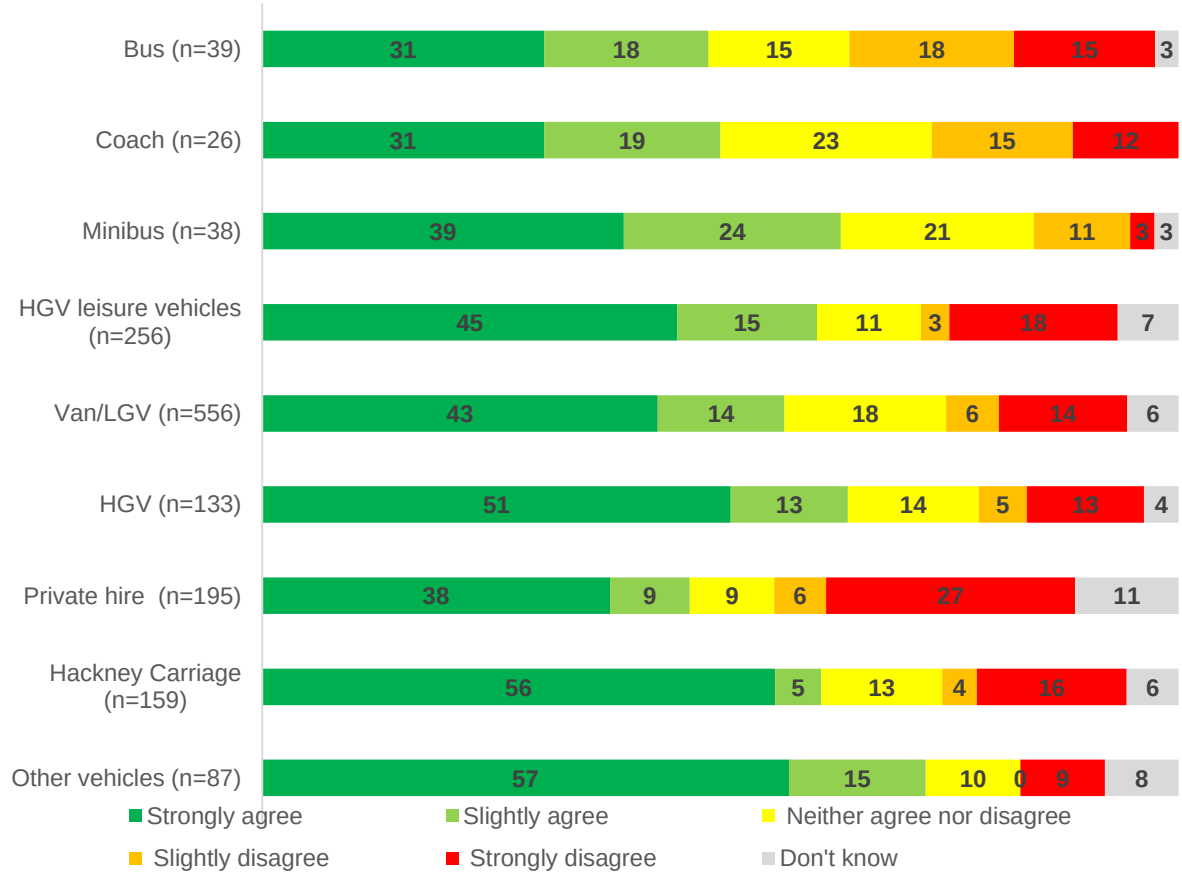


Base: All respondents

When analysed by the type of vehicle owned, **Figure 5.6** shows this extent of agreement. The highest proportion of vehicle owners who agree with the proposed permanent exemptions are HGV leisure and HGV owners (60% and 64% respectively). The two lowest, and the only two with under half the owners agreeing with the permanent exemptions are bus owners (49%) and private hire vehicle owners (47%).

Private hire vehicle drivers are more likely to strongly disagree with the proposed permanent exemptions (27%) compared to HGV and LGV / van owners (13% and 14% respectively).

Figure 5.6 Extent of agreement with permanent local exemptions by vehicle type (%)



Base: All respondents who own a vehicle that might be subject to a daily charge
Caution should be used where base is small (n<50)

5.2.2 Comments about permanent local exemptions

Respondents were given the list of proposed permanent local exemptions from the Clean Air Plan and almost half provided a comment about them.

The table below shows the main comments made by each type of respondent. Of those commenting around half gave a supportive comment.

Table 5-5 Comments about permanent local exemptions

	General Public	Business	Representatives
General support	951	169	34
Concerns about permanent exemptions	358	73	10
Type of vehicles that should be permanently exempt	523	138	38
Type of vehicles that should not be permanently exempt	206	24	8
Miscellaneous	283	37	14
Base	**1749**	**343**	**74**
Proportion of all respondents (%)	45	44	60

5.2.2.1 Support for permanent local exemptions

Of those that gave a comment, more than half of members of the public (n=950) and businesses (n=169) provided supporting comments for the permanent local exemptions.

	General Public	Business	Represent - atives	Own impacted vehicle	No impacted vehicle
Support / agree with the permanent local exemptions	951	169	34	296	852

Comments included:

> *"It is unfair to charge a vehicle a daily rate if they had no other option than to travel in the payment zone due to a diversion." (Public, aged 35-54, Private Car)*

> *"I would agree with the statement as it would mean that HGV recovery vehicles would be exempt from the daily charge, this meaning that these specialist vehicles would not have to be replaced." (Business, HGV, Private Car)*

> *"They should be exempt anyway, yeah, yeah. I mean you're not going to see many tanks driving round Manchester, are you? Obviously, ambulances and police, they've got to be exempt from it." (Focus Group: Public aged 40+, Bus / Taxi users)*

5.2.2.2 Concerns about permanent local exemptions

The main concerns raised about the proposed permanent local exemptions were:

	General Public	Business	Represent-atives	Own impacted vehicle	No impacted vehicle
Disagree with the permanent exemptions (general)	264	66	5	99	235
Exemptions should be temporary	40	4	0	4	40
Are unfair / more vehicles should be temporarily exempt	28	6	3	17	17
Not needed / should have upgraded already	23	1	0	6	17
Permanent exemptions should be regularly reviewed	13	0	2	1	14
Base	**358**	**73**	**10**	**124**	**312**

Generally, disagree with permanent exemptions: Of those that gave a comment, about a fifth (n=66) of business and a similar proportion of the public (n=264) and n=5 representatives gave a comment opposing the exemptions in general.

Some of those who opposed noted the permanent local exemptions were not needed and felt vehicles should have been upgraded already. Others stated no vehicle should be exempt because clean air needs to be a priority:

> *"There should be no exemptions. It is never impossible to replace a polluting vehicle, only expensive. Our lungs don't care what type of vehicle the pollution has come from. Instead of exemptions, there should be funds available to help organisations and individuals who claim to be unable to afford to change their vehicles to do so." (Public, aged 18-34, No Vehicle)*

> *"The purpose is to move to cleaner vehicles. Allowing exemptions prevents this being an incentive to change. Not allowing exemptions means vehicles that are not compliant will be moved to areas outside the zone creating pollution there instead. Removal of exemptions creates a situation where people purchasing non-compliant vehicle's will not be able to travel to the area, meaning will be at a disadvantage compared to those businesses which have invested in cleaner technology." (Business, Private Car)*

> *"This policy is supposed to be designed for the protection of the young and vulnerable. To allow dispensation for any vehicle would contradict the whole meaning of the proposal. A polluting vehicle is a polluting vehicle who ever drives it." (Business, PHV)*

> *"the number of exempted vehicles (e.g. commercial vans) and the absence of an end date for those exemptions make us dubious of the real effect of the clean air charge." (Organisation, Whalley Range Climate Action Group)*

> *"Because the objective is to promote clean air into the city centre or Greater Manchester even and yeah, you'd need to include everybody and I know that includes myself, because I've got a vehicle of my own, but yeah, if that's the purpose of it and the intention is to reduce, yeah, sort of promote clean air and reduce Co2 emissions and whatnot, yeah, then it would include every driver and promote the electric vehicles and low emission vehicles." (Focus Group: Public aged 18-40)*

Proposed permanent local exemptions are unfair and more vehicles should be exempt (public n=28; business n=6; representatives n=3): Some respondents felt the permanent local exemptions should cover more affected vehicles, as it was unfair to include only the proposed vehicle types in the exemptions:

> *"I think there should be more exemptions. food delivery. school transport. jobs that can`t use public transport such as trades carrying tools etc. you want to charge around £50 or should i say take £50 a week from their wages because they haven`t got a choice. maybe if an individual's earnings were below a certain amount, they could be exempt. to a lot of people, a vehicle is a necessary evil that sucks money from their pocket, you`re going to make that worse or deprive them of a job altogether." (Public, aged 35-54, LGV)*

> *"The vehicles listed in this exemptions list are a starting point. They are unique vehicles and thus are expensive to convert or replace. The list needs to have flexibility built into it as some companies may have specialist cranes or recovery vehicles that are expensive custom-built vehicles. This can apply to a range of vehicles. These need including or assessing for inclusion." (Councillor / Elected Official)*

Exemptions should be temporary or at least regularly reviewed (public n=40; business n=4): Some felt the exemptions should only be a temporary measure to provide those affected with more time to upgrade:

> *"There are probably a number of other categories of vehicle that need exemption that do not appear to have been included" (Public, aged 55+, Private Car)*

> *"The aim should be for all vehicles to be low emission. No exemption should be permanent." (Public, age not provided, Private Car)*

> *"Permanent exemption means there is no incentive for these vehicles to be compliant, ever. Fine that there is a time delay and understand that some are only on roads for a very limited time so there is little effect. I hope this will be monitored carefully and the cases have to be justified. Also, community minibuses - fair enough that these are given time to comply but an open-ended exemption is putting polluting vehicles into the centre of communities, e.g. travelling to schools." (Public, aged 55+, Private Car)*

5.2.2.3 Vehicles that SHOULD be permanently exempt

When respondents specified the certain vehicles, they felt should be included in the local permanent exemptions, the vehicle classes most frequently mentioned were:

	General Public	Business	Represent-atives	Own impacted vehicle	No impacted vehicle
Private leisure vehicles (e.g. horsebox, motorhome)	234	17	13	202	40
Vehicles used by disabled / vulnerable users	148	36	6	57	132
Buses	84	10	1	21	74
Taxis (hackneys and PHVs)	51	51	9	57	53
GM residents	34	8	1	26	16
Business vehicles	34	17	5	31	24
Specialist vehicles	18	17	8	22	9
Vans / LGVs, HGVs	16	8	2	17	9
Coaches and minibuses	12	2	1	4	10
Base	**523**	**138**	**38**	**358**	**307**

Private leisure vehicles (public n=234; business n=17; taxi n= 4; representatives n=13): Over three quarters of the public who commented that private leisure vehicles should be permanently exempt owned an impacted vehicle; mainly horseboxes. Respondents felt the vehicles that fell into these categories were too expensive to upgrade or were not used enough to justify the upgrade:

> *"I would like to propose that horseboxes are specialist vehicles. They are essential to the industry and extremely expensive to purchase in comparison to vehicles of the same age so cannot be affordably upgraded. They are very low mileage, infrequently used and maintained to the highest standards." (Business, LGV, Private Car)*

> *"Horse lorries tend not to be used frequently, often they will be used no more than once a week, they therefore do not contribute greatly to Greater Manchester's poor air quality and we would ask that they be exempt from the charges, like the exemption that is being given to fairground vehicles, or have an exemption for 52 days of the year, i.e. once a week." (Organisation, The British Horse Society)"*

Vehicles used by disabled / vulnerable users (public n=148; business n=36; representatives n=6): Over a fifth of the public commented vehicles used by disabled and vulnerable users should be exempt. Many of these comments came from those who owned an impacted vehicle:

> *"I drive a wheelchair accessible vehicle, and this is tax exempt. My parents (who I live with) have a disabled passenger vehicle that they use to transport me when I don't feel able to drive, for example, I often get tired due to my condition and this means I am unable to drive myself. This disabled passenger vehicle is not tax exempt as you can only have one vehicle with this tax exemption. If the current proposals came into force then we would have to pay when coming into Greater Manchester with whichever accessible vehicle (i.e. adapted van) is not tax exempt and this would mean £10 each time, which is extremely unfair and financially prohibitive. The exemptions should be widened so that it includes ALL disabled passenger vehicles and wheelchair accessible vehicles that are used as such regardless of whether or not they are tax exempt. Non-disabled people have the flexibility of being able to drive or being driven and for most people this can be in the same vehicle but often this is not possible for disabled people in adapted vehicles due to the nature of the adaptations. Please therefore expand the definition of 'disabled passenger vehicle' under the exemptions so that disabled people are not discriminated against in this way and are not financially penalised." (Public, aged 18-34, Private Car)*

> *"Exemptions should be granted for those who have a genuine need to drive in the zone, such as those with a Blue Badge and other mobility issues, alongside targeted financial support to assist them to upgrade to a zero-emission vehicle." (Organisation, Client Earth,)*

Buses (public n=84; business n=10; representatives n=1): Respondents felt buses should be exempt as public transport usage helps towards clean air; and if buses were charged, comments expressed concern the charges would be passed down to the public, deterring the use of buses, when it should be encouraged:

> *"Buses should be exempt in order to encourage greater usage." (Public, aged 55+, Private Car)*

Taxi (public n=51; business n=51; representatives n=9): Nearly all of the business respondents who commented that taxis should be permanently exempt owned a taxi – either a private hire vehicle or a hackney cab. Comments were made that some vehicles are licensed wheelchair accessible vehicles and should have an exemption:

> *"Licensed wheelchair accessible hackney carriages & PHVs registered in High Peak should also benefit from the exemption. High Peak residents, including those in need*

of wheelchair accessible travel option, are often dependant on key services and facilities with Greater Manchester e.g. health care and education." (Organisation, High Peak Borough Council)

Fewer comments (around 50 or less in total) were received about other vehicle types and groups and examples of these comments are shown below:

- **GM residents** (public n=34; business n=8; representatives, n=1);
- **Specialist vehicles** (public n=18; business n=17; representatives n=8);
- **Vans / LGVs and HGVs** (public n=16; business n=8; representatives n=2); and
- **Coaches and Minibus** (public n=12; business n=2; representatives n=1).

"Charging a van driver from a small business could put a massive strain on the owner of the business that may already be struggling. As for HGV's that are a part of massive companies they could make a payment to help towards the environment but £60 a day per truck could be very expensive and just because you are a company with one lorry shouldn't change for a company that as twenty lorries." (Public, age not provided, Leisure Vehicle, Private Car)

"In addition, the Federation proposes an additional small category of historic buses less than 30 years old but greater than 20 years old in order to make appropriate provision for disabled and senior citizens whose access to and participation in historic vehicle events would otherwise be constrained." (Organisation, FBHVC)"

Neighbouring authorities requested some specialist vehicles such as cleansing, refuse, highway maintenance and community minibuses which are operating in Greater Manchester and provide valuable services should also be exempt:

"Provide exemption for St Helens Borough Council vehicles such as cleansing, refuse, winter maintenance and highway maintenance vehicles who due to the nature of the boundary have to cross into Greater Manchester to maintain infrastructure and essential services for very short trips." (Organisation, St Helens Council)

"Licensed wheelchair accessible hackney carriages & PHVs registered in High Peak should also benefit from the exemption. High Peak residents, including those in need of wheelchair accessible travel option, are often dependant on key services and facilities with Greater Manchester e.g. health care and education." (Organisation, High Peak Borough Council)

Bus operators suggested driver training buses should be exempt because they are only used for driver training and it is unlikely that they can be retrofitted:

"Like many bus operators, [Operator name] operates a dedicated fleet of driver training vehicles. These vehicles are primarily older vehicles, which have been cascaded down from the operational fleet and converted to bespoke driver training vehicles. As a result, it is highly unlikely that these vehicles could be retrofitted to the required standard. If such vehicles are not exempted from the CAZ requirements, this will adversely affect our ability to recruit and train new drivers. This in turn will mean that, as staff numbers reduce through natural wastage, services will be reduced and even routes withdrawn, due to the inability to replace staff." (Business, Bus)

5.2.2.4 Vehicles that SHOULD NOT be permanently exempt

When respondents specified certain vehicles they felt should not be included in the local permanent exemptions, the vehicle classes most frequently mentioned were:

	General Public	Business	Represent-atives	Own impacted vehicle	No impacted vehicle
Disabled passenger vehicles	104	17	2	26	96
Driving within the zone due to a road diversion	40	2	3	3	42
Motorway diversions are hard to manage	30	1	1	3	29
Specialist vehicles (e.g. adapted vehicles)	29	3	1	6	27
Historic and military vehicles	23	1	1	4	21
Community minibuses and non-road going vehicles	8	1	0	0	9
Base	**206**	**24**	**8**	**41**	**196**

Disabled passenger vehicles: Of the comments received from the public about vehicles not being permanently exempt (n=104), respondents commented that disabled passenger vehicles should not be permanently exempt; which is opposite to the 148 comments made by the public in support of vehicles that are used by disabled or vulnerable users being permanently exempt:

> *"I think exemption due to disability is unfair as disabled people don't have to drive in the city centre and this just provides an excuse not to make public transport more accessible. Disabled people are not always exempt from council tax." (Public, aged 18-34, Private Car)*

Driving within the zone due to a road diversion: Some of the public (n=40) disagree with the proposed permanent exemption of driving through the zone due to diversions and felt these drivers should still be subject to the charge:

> *"Diversions are a function of normal travel; no exemptions should apply." (Public, aged 55+, Private Car)*

> *"If it's a business being diverted into the city, then they should still pay, just like when we have to pay for a toll road." (Public, aged 35-54, LGV, Private Car)*

Respondents commented on how all vehicles contribute to air pollution and should not be exempt:

> *"Because if this system is brought in, and the correct intention is to create cleaner air, then all vehicles public, private, and business vehicles should be liable. I think disabled vehicles will pollute just as much as any other vehicles and the owners should be liable just the same. If these measures are brought in it should be about a fair playing field for all polluting vehicles." (Business, Hackney)*

> *"Historic vehicles are gas guzzlers. They produce more pollution than like a modern car." (Focus Group: HGV, LGV)*

5.2.2.5 General concerns and queries about the proposals

Some general concerns were raised:

	General Public	Business	Represent - atives	Own impacted vehicle	No impacted vehicle
Concern about enforcement / ensuring the exemptions are not abused	108	4	4	12	102
Queries about the proposals / information not clear	129	25	5	53	102
Other	55	30	6	73	142
Base	**283**	**37**	**14**	**85**	**236**

Concern about the enforcement and ensuring the exemptions are not abused (public n=108): In the main, it was the public who expressed concerns about the potential for bending or breaking the rules to register vehicles exempt and wanted to make sure there was sufficient enforcement to prevent this:

> *"I agree in principle but am concerned the exemptions may be misused/abused. It would need to be robustly managed." (Public, aged 18-34, PHV)*

> *"The exemptions seem very loosely worded and open to massive potential abuse. The only one which can be justified is the exemption for disabled tax class vehicles, which you would have thought would have been covered by the private car exemption anyway." (Public, aged 35-54, Private Car)*

Queries about the proposals / information not clear (public n=129; business n=25; representatives n=5): Respondents had queries about the permanent exemptions, most were asking for clarification on the wording of the information, especially what a specialist vehicle was:

> *"The term 'specialist vehicle' needs to be comprehensively explained before asking people to agree with how such vehicles are treated." (Public, aged 55+, LGV, Private Car)*

> *"So, if you look permanent exemptions, Military Vehicles, so the Government are saying our vehicles are going to be exempt, emergency vehicles, so that's Police, VOSA, fire engines all exempt because that's their money, and then further down you've got a Showman's Guild Vehicle. So why should someone with a fair not have to pay when we have, and surely what we do is more important than a fairground once a year." (Focus Group: Minibus, Coach)*

5.2.3 Temporary local exemptions

The following explanation was provided in the questionnaire along with a reference to the consultation document for further information.

Greater Manchester are proposing temporary local exemptions from Clean Air Zone charges until 31 December 2022 to give certain vehicles more time to upgrade due to cost / supply of a compliant vehicle and to lessen impacts considered outside of the control of the vehicle owner, these include wheelchair accessible hackney / private hire vehicles, and vans.

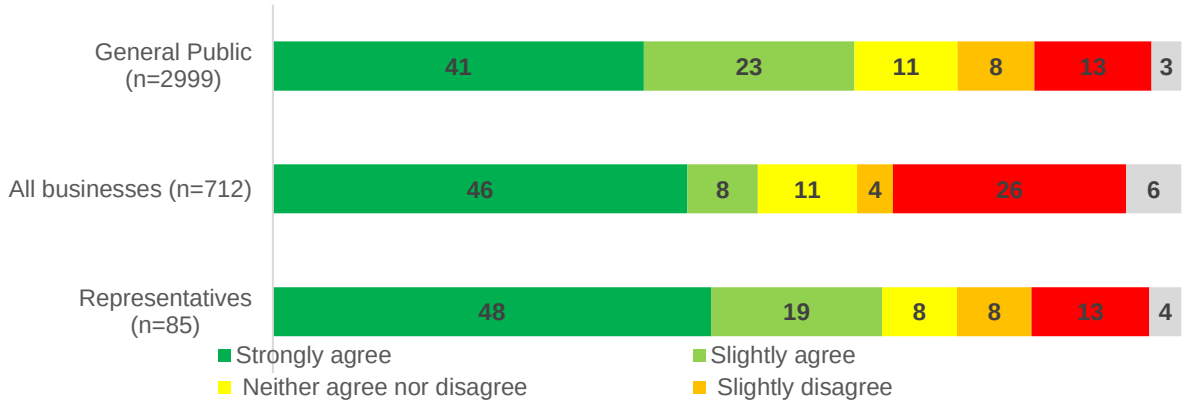
The vehicle types which are currently proposed to have a temporary exemption are:

Vehicle type	Description
Vans and minibuses (which are not a licensed hackney carriage or PHV or used to provide a registered bus service)	Light Goods Vehicles (vans) and minibuses which are not used as a licensed taxi, PHV or on a registered bus service, will be eligible for a temporary exemption until 31 December 2022. After 31 December 2022, non-compliant vehicles will be charged.
GM-licensed Wheelchair Accessible hackney carriages & PHVs	Wheelchair Accessible hackney carriages and accessible private hire vehicles (PHVs), which are licensed to one of the 10 GM Authorities, as of the 3 December 2020 will be eligible for a temporary exemption until 31 December 2022. After 31 December 2022, non-compliant vehicles will be charged.
Coaches and buses registered to a business address within GM and not used on a registered bus service within GM.	Coaches and buses registered to a business address within GM and not used on a registered bus service within GM will be eligible for a temporary exemption until 31 December 2022. After 31 December 2022, non-compliant vehicles will be charged.
Outstanding finance or lease on non-compliant vehicles	Non-compliant vehicles subject to finance or lease agreements entered into before 3 December 2020 which will remain outstanding at the time at which the GM CAZ becomes operational, will be eligible for a temporary exemption until the agreement ends or until 31 December 2022, whichever is sooner. After 31 December 2022, non-compliant vehicles will be charged.
Limited supply (awaiting delivery of a compliant vehicle)	Owners or registered keepers of non-compliant vehicles that can demonstrate they have placed an order for a compliant replacement vehicle or retrofit solution, will be eligible for a temporary exemption until such a time as they are in receipt of the compliant replacement vehicle or retrofit solution, or for 12 weeks, whichever is sooner.
Driving within the zone because of a road diversion	Vehicles driving within the zone because of a road diversion who would otherwise not have entered the GM CAZ. Applies only while the diversion is active and subject to non-compliant vehicles being on the designated diversion.

Each respondent was asked about the extent of their agreement with the temporary local exemptions.

Over 50% of all types of respondent agreed with the temporary local exemptions. Businesses were the most likely to disagree (30%) with the temporary local exemptions than any other type of respondent as shown in Figure 5.7.

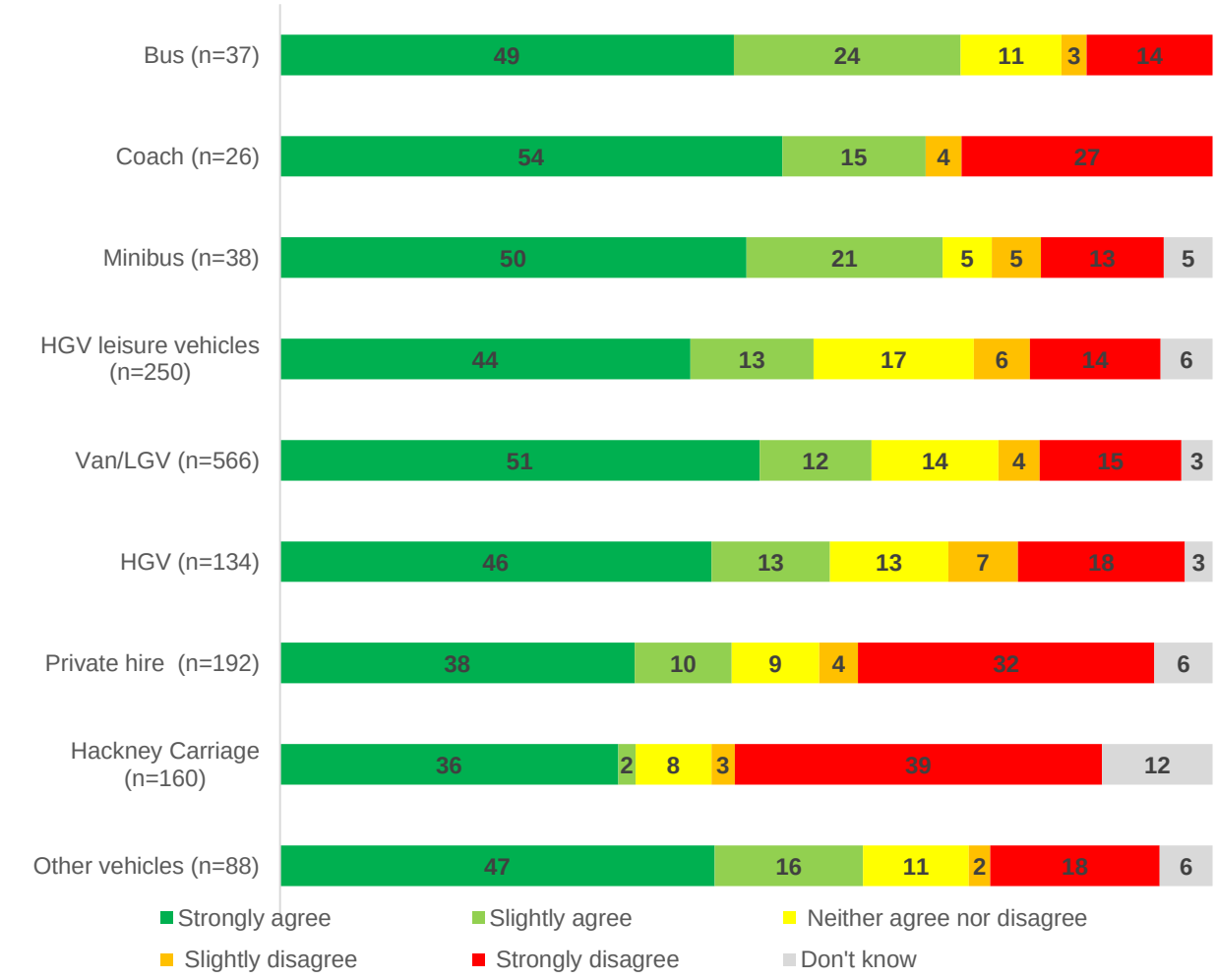
Figure 5.7 Extent of agreement with temporary local exemptions (%)



Base: All respondents

Figure 5.8 shows the extent of agreement by vehicle type. With the exception of hackney and PHV drivers, vehicle owners were more likely to agree than disagree. Hackney carriage and private hire vehicle drivers had the highest proportion of those who disagreed with the temporary exemptions (42% and 36% respectively).

Figure 5.8 Extent of agreement with temporary local exemptions by vehicle type (%)



Base: All respondents who own a vehicle that might be subject to a daily charge
Caution should be used where base is small (n<50)

5.2.4 Comments about the Temporary Local Exemptions

Over a third of respondents provided a comment on the Temporary Local Exemption of which over half gave a generally supportive comment. Over a third of businesses raised concerns.

The table below shows the main comments made by each type of respondent. Not everyone provided a comment.

Table 5-6 Comments on the temporary local exemptions

	General Public	Business	Representatives
General support	813	159	30
Concerns	413	122	19
Alternative suggestions*	441	49	11
Types of vehicle should not be exempt	29	3	3
Types of vehicle should be exempt	35	15	5
Miscellaneous	68	9	1
Base	**1537**	**304**	**55**
Proportion of all respondents (%)	40	39	44

* The consultation identified two email campaigns (**see section 2.2.2** for details). This point was mentioned in the Environmental Bill Lobby campaign emails making up three quarters (n=172) of these comments.

5.2.4.1 General support for the temporary local exemptions

Half of the comments received about the temporary local discounts gave general support (public n=774; representatives n=27; business n=155).

	General Public	Business	Represent-atives	Own impacted vehicle	No impacted vehicle
Support / agree with the temporary local exemptions / they are fair	774	155	28	243	710
This gives enough time to upgrade	67	5	2	12	62
Base	**813**	**159**	**30**	**251**	**747**

Respondents felt it was fair to give this additional time to allow vehicle owners to source the funds to upgrade or buy a new vehicle that meets the standard:

> *"We welcome the Clean Air Greater Manchester's proposals to provide a temporary exemption for vans until 31 December 2022 given that the proposed CAZ will affect over 1,200 Royal Mail vehicles. We ask for at least two years between the plans for a CAZ being finalised and the date by which vans will need to compliant. This will allow sufficient time for Royal Mail to reconfigure the extensive fleet which serves Greater Manchester." (Business, LGV, HGV)*

> *"It seems a fair approach and gives time to effect changes." (Councillor / Elected Official)*

5.2.4.2 Concerns about the temporary local exemptions

The following concerns were raised about the proposed temporary local exemptions:

	General Public	Business	Represent - atives	Own impacted vehicle	No impacted vehicle
This is not enough time for the temporary exemption / need longer	226	92	10	151	175
Disagree with the temporary exemptions (general)	122	18	7	31	116
Temporary local exemptions are not needed / should have upgraded	41	4	1	6	40
Will not help / will not be able to afford to upgrade even if more time	20	12	1	23	10
Unfair / more vehicles should be temporarily exempt	11	2	1	8	5
Base	**413**	**122**	**19**	**213**	**338**

Most of the concerns raised were about the time being allowed for temporary exemptions and longer was required while others, mainly those who did not own an impacted vehicle (n=116), provided comments in general disagreement with the temporary exemptions.

There isn't enough time and the exemptions needed longer (public n=226; business n=92; representatives n=10): of the businesses who felt they needed longer, almost all owned either a van (n=44) or a taxi (n=41) with HGV owners (n=13) and coach and minibus owners (n=4) also contributing, [note some businesses own more than one type of vehicle]:

> *"I don't think the extension is long enough, I calculate that I would need to find £200,000 to upgrade my fleet to avoid charges. This is impossible in two years. This extension should be a 3 year minimum to give business a chance to respond, the government are already looking to remove diesel van from 2030 so any investments in fleet are going to be less value for money going forward." (Business, LGV)*
>
> *"I think that people and businesses are still trying to get through and recover from the Covid pandemic and giving them two years to change their vehicles is not enough time, this should be 3-4 years, to enable business to recover from this pandemic." (Business, HGV)*
>
> *"I agree there should be an exemption period, but you are not giving operators enough time to convert their fleet. Procurement of Specialist HGVs and buses in particular need financial planning well in advance. The exemption period needs to be longer. Please consult with industry separately on this, as members of the general public do not have enough information to make a considered opinion." (Public, aged 35-54, Private Car)*
>
> *"Too much has happened this year. No one has the money to be reacting to these proposals. There needs to be some temporary delays. Otherwise people will be forced out of their industries." (Business, Hackney driver)*
>
> *"We in the Hackney trade desperately require these temporary exemptions to be lengthened the timescale it's too short. The main reason for this is availability of vehicles the cost of those vehicles lack of business in the trade which could last for*

two or three more years and the fact that with the figures drivers are receiving at the moment in revenue the vast majority of the Hackney trade would not be able to secure the finance required to purchase a new vehicle." (Business, Hackney)

General disagreement with temporary local exemptions (public n=122; business n=18; representatives n=7): of those who provided comments disagreeing with temporary local exemptions in general, most (n=116) did not own an impacted vehicle:

"I do not agree with the clean air zone at all. The temporary exemption is nowhere near long enough. The clean air zone is not needed as vehicles will be upgraded eventually anyway." (Public, aged 18-34, LGV, Private Car)

Some respondents, mainly the public (n=41) **disagreed with the temporary exemptions** as they felt vehicles should have already upgraded as there has been warning of this plan for years, and no more time should be wasted through exemptions:

"Clean options are readily available and have been for some time. Allowing an exemption only delays the inevitable required investment. Companies and individual unable to invest in compliant vehicles today are equally unlikely to be able to when the exemption ends" (Business, Private Car)

"They already have a number of years warning that the changes are coming so should be acting now" (Public, aged 35-54, No Vehicle)

5.2.4.3 Alternative suggestions for temporary exemptions

Suggestions included:

	General Public	Business	Represent - atives	Own impacted vehicle	No impacted vehicle
Incentivise behaviour change / need more incentives for upgrades	221*	6	3	11	43
Temporary exemptions should be shorter	169	8	4	3	178
Temporary exemptions for vehicles until they are due for an upgrade	57	32	4	36	53
Vehicles should be temporarily exempt until after the Covid-19 pandemic	4	4	0	5	3
Base	**441**	**48**	**11**	**53**	**268**

* The consultation identified two email campaigns (**see section 2.2.2** for details). This point was mentioned in the Environmental Bill Lobby campaign emails making up three quarters (n=172) of these comments.

Temporary exemptions should be shorter (public n=169): Around 15% of comments from the public suggested the temporary exemptions should be for a shorter period of time:

"We need to reduce the impact of these vehicles urgently, not in 2 years time so whenever the deadline, they are likely to wait as long as they can before upgrading/replacing. Let people know about it now through promotions and set the deadline as December 2021" (Public, aged 34-54, Private Car)

"You should bring this into effect sooner. This has been known about for some time and vehicle owners should have had plenty of time to make changes. Meanwhile people are still suffering from the effects of polluting vehicles." (Public, aged 18-34, Private Car)

> *"It is fair to allow owners some time to adapt their vehicles but two years seems excessive given that there has been plenty of advanced publicity that the scheme is going to be imposed." (Councillor / Elected Official)*

Temporary exemptions for vehicles until they are due for an upgrade (public n=57; business n=32): Some felt they should be provided with temporary exemptions to provide them with additional time to upgrade to compliant vehicles:

> *"I think they should be allowed to drive till their age allows them when they're due to change then they should be asked to change to electrical vehicles" (Business, Hackney)*

> *"I think the whole process is being fast tracked and rushed. It is not affordable/feasible at this current economic climate because of Brexit and Covid. There needs to be a realistic scope of all proposals and policies. It needs to be phased in gradually. At the moment it is been fast tracked without the majority of general public and businesses unaware." (Business, PHV)*

> *"Given the pressure nationally on supply chains to undertake a great deal of [retrofitting] simultaneously we would urge a derogation is applied to specific non-compliant EURO V vehicles used on local bus services of up to 1 year from the date of institution of any CAZ implementation provided that the operator can demonstrate that orders have been made for the retrofit kits and that a contract is in place with an appropriate installer." (Business, Bus, Coach)*

Similarly, a bus and coach company suggested that they should remain exempt until current contracts expire.

> *"With an aim of a Spring 2022 launch date there will be a number of contracts which expire within a few months. According to your latest Contract Matrix there are 79 resource school contracts which expire in July 2022. We operate 13 of these. Eight of our vehicles will reach their 15 year limit in July 2022. These buses are already 13 years old so do not qualify for retrofitting and penalties would apply if used. This seems unreasonable given that the contracts were awarded without a requirement to meet the Clean Air Zone requirements. A sensible solution would be to exempt buses with 56 or 07 registration numbers that are used on TfGM contracts until 31 August 2020 (when they non-compliant on age grounds)." (Business, Bus, Coach)*

A few taxi respondents (n=3) felt **vehicles should be temporarily exempt until after the Covid-19 pandemic has passed**:

> *"Far too short of a time frame and worse still when you factor in the dramatic affects Covid 19 has had on drivers earnings. Most drivers would have struggled with this proposal under normal business activity. But Covid has decimated earnings and confidence throughout the whole of the industry, PHV and Hackneys alike." (Business, PHV Operator)*

Incentivise behaviour change (public n=49 and an additional 172 from the Environmental Bill Lobby email campaign; business n=6; representatives n=3): Respondents felt more needed to be done to make sure polluting vehicles were being taken off the road and upgraded as quickly as they could. Comments suggested support should be provided in order to incentivise behaviour change:

> *"Support or incentives should be given to businesses to make the change to compliant vehicles run smoother" (Public, aged 18-34, Private Car)*

> *"Tackle the issue now, the government should provide the incentives to allow people to upgrade\switch etc." (Public, aged 18-34, No Vehicle)*

5.2.4.4 Vehicles that SHOULD NOT be temporarily exempt

Respondents who provided a comment felt the following vehicles should not receive temporary exemptions:

	General Public	Business	Represent - atives	Own impacted vehicle	No impacted vehicle
Taxis (PHV's and hackney)	18	3	1	5	17
Vans / LGVs	14	0	2	0	15
Base	**29**	**3**	**3**	**5**	**29**

Taxis, both hackneys and private hire vehicles, should not be temporarily exempt (public n=18): Respondents felt these vehicles are big polluters because of the distance they travel during the day. Some also felt taxis idle with their engines on too often creating more pollution:

> *"Private hire and hackney cabs are big polluters per day. Charge is not sufficient to incentivise change." (Councillor / Elected Official)*

Vans / LGVs should not be temporarily exempt (public n=14): A similar concern to the one for taxis was given as the reason why vans and LGVs should not be temporarily exempt within the clean air plan. Respondents felt additional funding should be given instead of a temporary exemption:

> *"The inclusion of vans on an exemption list doesn't feel right, as they are the second biggest source of air pollution. Funding should be such that those affected can be compensated and transition more quickly. It is the right thing to do, so funding should reflect that." (Public, aged 18-34, Private Car)*

5.2.4.5 Vehicles that SHOULD be temporarily exempt

Respondents who provided a comment felt the following vehicles should receive temporary exemptions:

	General Public	Business	Represent - atives	Own impacted vehicle	No impacted vehicle
Specialist vehicles and those used by disabled	15	3	1	5	12
Taxis and private hire vehicles	11	5	4	5	15
Private leisure vehicles (e.g. horsebox, motorhome)	11	1	1	7	6
HGVs	3	5	0	5	3
Buses, coaches and minibuses	1	3	0	1	2
Base	**35**	**15**	**5**	**21**	**31**

Specialist vehicles and those used by disabled people (n=15): The following quote highlights the concern about these vehicles:

> *"This is the type of vehicle my husband drives; the elderly and disabled need taxi services to help them live independently and do their shopping etc. They can't afford higher fares but this is what will happen." (Public, aged 55+, PHV)*

Private leisure vehicles: It should be noted there were multiple comments throughout the responses to this question where it was stated instead of private leisure vehicles being

temporarily exempt, they should be permanently exempt. This was spoken about mostly for horseboxes.

Respondents from the equestrian community state their private leisure vehicles (horseboxes) are not significant contributors to pollution, as they aren't on the road for prolonged periods of time and are mainly used at the weekends:

> *"I use this box and travel less than 1000 miles per year and most likely only less than 500 miles per year, predominantly on Sundays. My contributions to unclean air are not very significant." (Public, aged 55+, Leisure Vehicle, Private Car)*

Some owners of motorhomes or campervans provided similar comments to horsebox owners:

> *"I own a van which is a campervan but its unable to be changed with the DVLA to say it's a motorhome on the log book. I can't afford a newer campervan as own my own car too. My campervan is used outside of the greater Manchester area for the vast majority of the time and I only use it as a second vehicle, on a limited miles insurance policy. I feel people in my situation are being penalised and being put into the same category as someone who uses their van on a daily basis for business use." (Public, aged 18-34, LGV, Private Car)*

5.2.4.6 General concerns and queries about the proposals

Some queries were raised:

	General Public	Business	Represent-atives	Own impacted vehicle	No impacted vehicle
Queries about the proposals / information not clear	32	3	0	13	22
Concern about enforcement of temporary exemptions / ensuring they are not abused	23	0	1	4	20
Other	14	30	6	18	37
Base	**68**	**9**	**1**	**22**	**56**

Queries about the proposals / information not clear (public n=32; business n=3): Respondents who both supported and opposed these exemptions had queries, most were asking for more information and more details:

> *"This will depend what support vehicle owners are given. with support there should be time for all adaptations and no need for exemptions. How long would exemptions last?" (Public, aged 55+, Private Car)*

Concern about the enforcement and ensuring the exemptions are not abused (public n=23): It was mainly the public who expressed concerns about the potential abuse the temporary exemptions could cause. Comments show respondents wanted to make sure there was sufficient enforcement to prevent this:

> *"It seems fair, just needs to be ensured it is not abused." (Public, aged 18-34, Private Car)*

> *"I understand the rationale, but this should be monitored to ensure temporary exemptions are not abused." (Public, aged 35-54, Private Car)*

5.2.5 Permanent local discounts

The following explanation was provided in the questionnaire along with a reference to the consultation document for further information.

Greater Manchester are proposing permanent local discounts for Clean Air Zone charges for private hire vehicles licensed to one of the 10 Greater Manchester Local Authorities and also used as a private car, and leisure vehicles greater than 3.5 tonnes in private ownership.

The current proposed discounts are:

Private hire owners: A discounted charge of 5/7 of the weekly total.

HGV Leisure vehicles: Consideration for a charge equivalent to an LGV / van if registered in Greater Manchester.

Each respondent was asked about the extent of their agreement with these discounts.

Only representatives had over 50% who agreed with the proposed permanent local discounts. For each of the general public, business and taxis, while more agreed than disagreed, the proportion who disagreed was generally around one-third for each type of respondent.

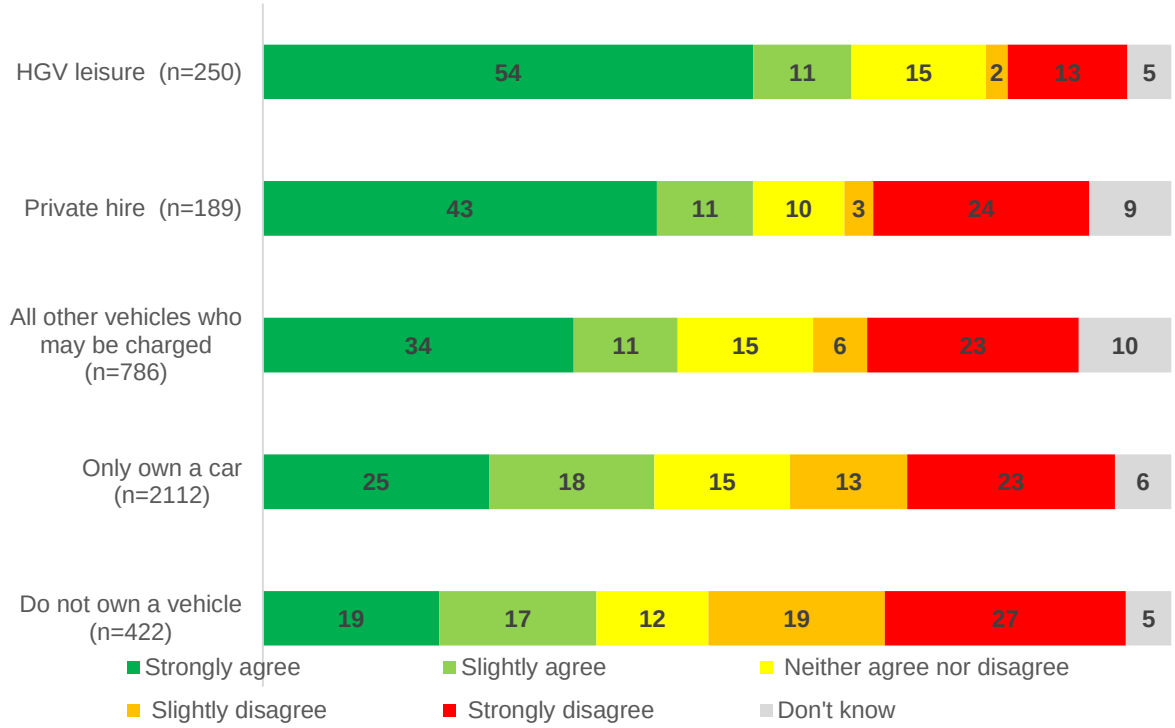
Figure 5.9 Extent of agreement with permanent local discounts (%)



Base: All respondents

Figure 5.10 shows the extent of agreement by vehicle type. The two vehicle types (HGV leisure and PHV) who would receive the discounts were more likely to agree (65% and 54% respectively) with the proposed discounts than those who did not own that type of vehicle. In total, around two-thirds of HGV leisure owners (65%) and just over half of private hire vehicle owners (54%) agreed with the proposed discounts.

Figure 5.10 Extent of agreement with permanent local discounts by vehicle type (%)



Base: All respondents

5.2.6 Comments about the Permanent Local Discounts

Respondents were given the proposed details about permanent local discounts for the Clean Air Plan and asked to provide any comments they had on this. Just over a quarter of respondents gave a comment of which around a third gave a generally supportive comment. However, half of the public and businesses raised concerns.

Table 5-7 Overall Comments about the Permanent Local Discounts

General concerns and queries about the proposals	General Public	Business	Representatives
General support	333	60	18
General oppose	623	82	15
Discount amounts	24	4	3
Discounts should be offered to more vehicle types / affected people	86	30	6
Miscellaneous	92	9	4
Base	**1115**	**180**	**42**
Proportion of all respondents (%)	29	23	34

5.2.6.1 Support for the proposed permanent local discounts

Generally supporting comments were received:

	General Public	Business	Represent-atives	PHV Owners	Leisure Vehicle Owners
Agree with the permanent local discounts	333	60	18	32	51

Respondents who owned a private hire vehicle (n=32) expressed support as many use their vehicles for personal use. A few stressed this offer should only be given to drivers from Greater Manchester, as they feel there is a problem with taxis registered in other parts of the country working within Greater Manchester:

> *"We regularly use ours (vehicle) for personal use, so would make it difficult to choose whether to taxi or have a family car if we couldn't do both due to having to pay the charge on days we weren't utilising the taxi as a taxi." (Business, PHV)*

> *"A good idea. but only for vehicles licenced within one of the Greater Manchester boroughs. There are too many PHV's currently operating within Greater Manchester that are licenced in the West Midlands and Merseyside that are maintained to a very poor standard of cleanliness and are often too small to be accessed by those with limited mobility." (Public, aged 55+, Private Car)*

Comments from owners of leisure vehicles e.g. a horsebox or motorhome (n=51) mainly showed support for any financial help that would be available to them:

> *"Motorhome owners will be able to keep their vehicles. Horse boxes etc are very expensive and essential for social events and training." (Public, aged 55+, LGV, Private Car)*

> *"This is an excellent proposal to allow horsebox owners within greater Manchester to use their lorries." (Public, aged 18-34, Leisure Vehicle)*

5.2.6.2 Concerns about the proposed permanent local discounts

The two types of vehicle who could be eligible for discounts are leisure vehicles over 3.5 tonnes and private hire vehicles and some comments were made specifically that these should not be offered discounts.

	General Public	Business	Represent-atives	PHV Owners	Leisure Vehicle Owners
Permanent discounts are not needed	377	52	7	5	7
Concerns about discounts being abused / enforced	124	11	4	1	1
Private hire vehicles should not be offered discounts	86	13	3	0	5
Concerns the discounts will result in people not upgrading	62	2	2	0	0
Leisure vehicles over 3.5 tonnes should not be offered discounts	39	4	2	0	0
Discounts should depend on vehicle age / pollution it causes	6	0	0	0	2
Base	**623**	**82**	**15**	**6**	**15**

Private hire vehicles shouldn't be eligible for a discount (public n=86; business n=13; representatives n=3): Respondents felt these vehicles were heavy polluters:

> *"Taxis are perhaps some of the most polluting vehicles so why offer a discount? If the scheme really is about pollution then all polluting vehicles should be charged." (Councillor / Elected Official)*

> *"I don't see why PHV should have a discount. They are businesses and any increase in costs can be passed on to consumers. Its then up to the PHV business to choose the vehicle (exempt or not) that best suits their business." (Public, aged 35-54, LGV,)*

> *"Private hire vehicles are inefficient in moving large numbers of people. It makes no sense to discount them." (Public, aged 18-34, Private Car)*

Leisure vehicles over 3.5 tonnes should not be offered discounts (public n=39; business n=4; representatives n=2): Most comments centred around all vehicles causing pollution and therefore did not agree with the discounts:

> *"I believe that private cars should be included in the restrictions, so discounting cars that are sometimes used privately makes no sense to me." (Public, aged 18-34, No Vehicle)*

> *"I disagree with the proposed permanent discount for leisure vehicles in private ownership >3.5t. These vehicles contribute to air pollution and need to be brought up to modern standards." (Public, aged 55+, Private Car)*

The majority of comments provided by respondents did not always refer to one of the two discounts and spoke in more general terms about discounts.

Discounts are not needed (public n=377; business n=52; representatives n=7): Just over half the comments provided by the public and businesses mentioned they felt discounts weren't needed as they felt every vehicle going through the Clean Air Zone should be charged. Others felt vehicles should have been upgraded already and therefore discounts were redundant.

Most of the comments that discounts are not needed were provided by those who do not own an impacted vehicle:

> *"Giving a discount would reduce the incentive to change to a less polluting vehicle. Also, public transport, cycling and walking should be being encouraged as modes of transport over driving. Use of private cars and taxis should ideally be reduced in order to improve air quality, reduce carbon emissions, and reduce congestion." (Public, aged 18-34, No Vehicle)*

> *"The provisions should apply to all vehicles that don't meet emissions standards, offering discounts undermines what the scheme is seeking to achieve." (Public, aged 18-34, Private Car)*

> *"These owners have known for a reasonable time that the clear zone was being implemented so should have started to make provision to acquire compliant vehicles." (Business, PHV)*

> *"We are concerned that the local discounts focus on the vehicles use rather than its impact on the environment. The example given of a PHV being used as a private car sometimes and therefore being charged 5/7 of the normal penalty is not applicable if the vehicle is used as a PHV seven days per week." (Business, Bus)*

Concerns about discounts being abused and how the discounts would be enforced (public n=124; business n=11; representatives, n=4): Some felt the discounts felt like a loophole for certain vehicles to pay less and questioned how the discounts would be checked and overseen:

> *"All private hire vehicle owners will simply claim their vehicle is used as a private car and therefore claim the exemption. This would make the charge on private hire vehicles pointless. This loophole is too large." (Public, aged 35-54, Private Car)*

"This seems like an exemption that would be difficult to police and right for abuse. Keep it simple charge polluting vehicles from entering our city." (Public, aged 18-34, LGV, Private Car)

Discounts could result in people not upgrading their vehicle (public n=62; business n=2; representatives n=2): stating the cost of an upgrade or replacement vehicle was larger than the charges once the discount was applied:

"It would seem likely that quite a large number of vehicles could fall within this reduction and thereby undermine the effectiveness of the changes. Given that most vehicles are probably leased, any change should be limited to the expiry of the average lease following the commencement of the zone." (Business, Private Car)

"A permanent discount on PHVs also used as private cars could provide a disincentive to adopting cleaner vehicles. Their primary function is commercial and this alone should be sufficient to bring them up to standard or pay the full clean air charges. Giving a discount because the vehicles may be used outside their working hours seems inappropriate and I am surprised this is being considered. PHV proposed charges are already low in any case." (Public, aged 35-54, No Vehicle)

5.2.6.3 Discount amounts

	General Public	Business	Represent -atives	PHV Owners	Leisure Vehicle Owners
Discounts should be higher	18	3	3	2	8
Discounts should be lower	5	1	0	0	0
Discounts should be higher due to / until through the Covid-19 pandemic	1	0	0	0	0
Base	**24**	**4**	**3**	**2**	**8**

Discounts should be higher: Suggestions were made the discount amount should be higher (public n=18; business n=3):

"for motorhomes, this does seem a bit draconian as these are privately owned vehicles - many are only in use at set times – e.g. off on holidays but where the motorhome is also the only private vehicle owned by a family, this charge would be prohibitive. Perhaps a double discount down to the level propose for PHV might be in order." (Public, aged 55+, Private Car)

5.2.6.4 Discounts should be offered to more vehicle types / affected people

Suggestions included:

	General Public	Business	Represent - atives	PHV Owners	Leisure Vehicle Owners
Discounts for: located outside GM but operate within	29	5	3	2	13
Discounts for: leisure vehicles under 3.5 tonnes	27	1	0	0	6
Discounts for: more vehicles / affected people	14	3	0	2	6
Discounts for: buses, coaches and minibuses	7	1	1	1	0
Discounts for: business vehicles	7	1	0	0	1
Discounts for: hackneys	6	20	3	1	0
Base	**86**	**30**	**6**	**6**	**25**

Those who are located outside of Greater Manchester but operate within the region (public n=29; business n=5; representatives n=3): This comment was raised in particular by those who live just outside of the Greater Manchester boundary, feeling they should be provided with a discount if they are not going to be eligible for funding support to upgrade:

> *"I live 50m just outside the boundary, but the motorhome is kept within GM. I will have to move sites and travel much further to avoid the £60 charge as I won't be eligible for a discount. I will be causing more pollution or will have to sell the motorhome. I can't believe that motorhomes contribute much, they do far fewer miles than cars for example." (Public, aged 35-54, Leisure Vehicle, Private Car)*

Hackneys: where 19 of the 20 comments were provided by hackney carriage owners. Some respondents felt other vehicles with the potential to be used privately should be treated the same as a private hire vehicle and should also receive a two-day discount:

> *"Hackney carriages, vans and minibuses can also be used for private and leisure use so should be treated the same." (Organisation, Tameside Owners & Drivers Association)*

> *"I find it strange that you just offer a discount to private hire vehicles that are used also as family cars as there are many hackney carriages that also are used as family cars and should be afforded the same exemption." (Business, Hackney)*

Leisure vehicles under 3.5 tonnes: 27 comments were made by the public of which 6 were leisure vehicle owners and while these comments were referencing a discount for this size of vehicle from the £10 daily charge, they did not specify the level of discount they would expect:

> *"What about vans or other vehicles uses for leisure but less than 3.5t? Many people have smaller Ford Transit, VW Transporter or other type of van which is solely used for leisure and not linked to a business. This must be considered in proposals and can be proved through households sharing details of their employment to prove their vehicle isn't used for a business." (Public, aged 25-34, LGV / Van, Private Car)*

6. Funding to upgrade to compliant vehicles

Summary of Findings

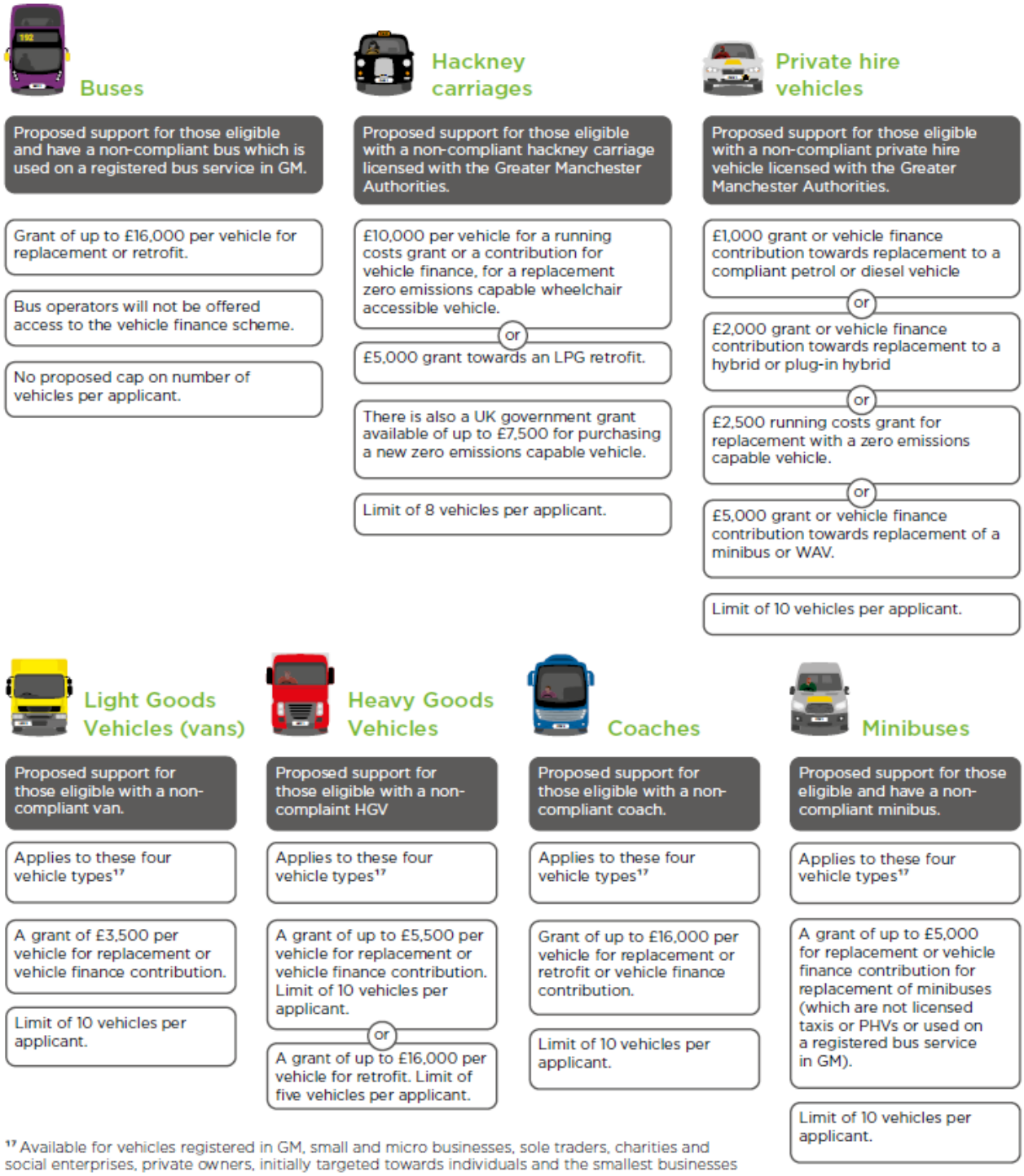
- There was a high level of support for the funds and many felt they were needed in order to help businesses upgrade.
- All types of vehicle owners felt the gap between the cost of a compliant vehicle and the amount of funding being offered was too great. Of those that thought they were eligible for funding* the following felt the funds would meet their needs:
    - PHV (51%)
    - Hackney (19%)
    - Van (17%)
    - HGV (26%)
- It was believed the devaluation of current vehicles and the inflation of prices for new vehicles because of the proposals would increase the financial deficit.
- Many businesses were not inclined, or able, to take additional finance options at the moment, owing to the impact of Covid-19, Brexit and general uncertainty for the future. There was a lot of concern about taking on more debt.
- Some suggested, to have the biggest impact on air quality, the funds should be prioritised for the most polluting vehicles.
- Others suggested funds should be targeted towards those that need them most.
- Concerns were raised for those that are based just outside of the boundary, and several comments were made that funding should be available to them.
- Some members of the public were against the funds as they did not feel public money should be used to help private business, and many felt companies should have already upgraded their vehicles.
- There were some concerns about mismanagement of the funds and people taking advantage of the scheme.
- Try before you buy received a mixed reaction; some felt it was a good idea, however, many questioned the capability of electric vehicles and the current infrastructure, and they did not see the benefit of the scheme.
- There was strong support for the hardship fund.
- Many respondents stated they needed additional funding and time to help the upgrade of their vehicles.

*Many did not think they would be eligible for funding even though their responses suggest they would be.

6.1 Introduction

Greater Manchester is requesting a package from Government to support owners or registered keepers of non-compliant vehicles with the cost of upgrading to vehicles that don't incur a charge. The figure below, taken from the consultation materials, summarised the key funding available for the different affected vehicles:

Table 6-1 Summary of funding available



[17] Available for vehicles registered in GM, small and micro businesses, sole traders, charities and social enterprises, private owners, initially targeted towards individuals and the smallest businesses with the oldest vehicles..

All respondents were asked for their comments on the proposed funding offers. Those with affected vehicles were asked if they thought they would be eligible to apply and, if so, would the proposed funding meet their needs.

In this section, we describe:

The response to the funding options by relationship to the CAP and the vehicles they own:

- Public without affected vehicle and representatives*;
- The Clean Bus Fund;
- The Clean Commercial Vehicle Fund – Van;
- The Clean Commercial Vehicle Fund – HGV;
- The Clean Commercial Vehicle Fund – Coach / minibus;
- The Clean Commercial Vehicle Fund – Leisure vehicles;
- The Clean Taxi Fund – Hackney; and
- The Clean Taxi Fund – PHV.

The management of funds;

- Try Before You Buy;
- The vehicle finance offer; and
- The hardship fund and additional support.

*Where representatives are related to, or have commented on a particular industry, these comments have been reported in the relevant section.

6.2 Public without affected vehicles and representatives

The Clean Bus Fund, The Clean Commercial Vehicle Fund and The Clean Taxi fund were introduced to everyone as follows:

The Clean Bus Fund (CBF): Greater Manchester are proposing financial support to help operators who are registered in Greater Manchester and run a registered bus service in Greater Manchester.

The Clean Commercial Vehicle Fund (CCVF): Funding to support coaches, minibuses, HGVs or vans.

Greater Manchester are proposing financial support to help smaller local business, sole traders and the Voluntary, Community and Social Enterprise (VCSE) organisations upgrade vans and HGVs, minibuses and coaches, to cleaner more compliant vehicles.

The Clean Taxi Fund (CTF): Greater Manchester are proposing financial support to help upgrade hackney carriages / private hire vehicles licensed to one of the 10 Greater Manchester Local Authorities to cleaner compliant vehicles.

In this section we describe members of the public without affected vehicles response to each of the three funds. It was assumed members of the public who emailed did not have an affected vehicle.

There were significant levels of support amongst the public for the funds, particularly the Clean Bus Fund (n=633) and the Clean Commercial Vehicle Fund (n=541). Fewer comments were received about the Clean Taxi Fund, but those that did largely supported the fund.

Some concerns were raised about the operation of the funds.

Table 6-2 Comments about the funds from public without affected vehicles

	Clean Bus Fund (CBF)	Clean Commercial Vehicle Fund (CCVF)	Clean Taxi Fund - Hackney (CTF – Hackney)	Clean Taxi Fund - PHV (CTF – PHV)
Support the fund*	633	541	470	286
Need more funding	80	569	78	64
Oppose the fund	206	81	193	159
Operation of the scheme	132	132	142	76
Miscellaneous	143	134	109	92
Base	**1067**	**1363**	**865**	**596**

*The consultation identified two email campaigns (**see section 2.2.2** for details). This point was mentioned in the Environmental Bill Lobby campaign emails, making up a quarter (n=172) of these comments.

6.2.1 Support for the funds

Support for the funds included:

	Clean Bus Fund (CBF)	Clean Commercial Vehicle Fund (CCVF)	Clean Taxi Fund - Hackney (CTF – Hackney)	Clean Taxi Fund - PHV (CTF – PHV)
Support the proposed funding / funding is important / needed to be able to conform/upgrade*	574	506	435	249
Funding should available to all vehicle types / fair to all (general comments)	76	42	44	41
Base	**633**	**541**	**470**	**286**

*The consultation was subject to an email campaign, from two environmental groups (**see section 2.2.2** for details). This point was mentioned in the Environmental Bill Lobby emails, making up two thirds (n=172) of these comments.

Examples of general supportive comments about all the funds include:

> *"I welcome this idea [bus fund] and think that as much support as possible should be directed towards supporting public transport operators to reduce the financial impact of the changes." (Public, aged 35-54, No Vehicle)*

> *"I think the [commercial] fund is a good idea and will be welcomed. The UK government should provide the funds to support this." (Public, aged 35-54, Private Car)*

> *"Supporting them is the only way they will be able to switch vehicles. If you want the scheme to be successful you must give them support." (Councillor / Elected Official)*

> *"I know cabbies don't make a huge living, so there needs to be grants and incentives to support the transition into new vehicles as opposed to letting them opt out if they say they cannot pay." (Public, aged 35-54, Private Car)*

> *"We need to make sure they're compliant and these [PHV] drivers are less likely to be able to afford to upgrade. But there are far more of them, at least where I live, so they are polluting more." (Public, aged 55+, Private Car)*

Members of the public stressed the importance of the funding in aiding buses to improve air quality and to help encourage the use of public transport instead of cars:

> *"I think it is a very good idea to help bus companies upgrade their buses to more environmentally friendly vehicles, I am aware of some vehicles that run within GM that are approaching 15 years old which is not good. so overall this is an excellent idea." (Public, aged 18-34, No Vehicle)*

> *"Yes. We need good clean buses. Please do this. There has to be a viable alternative to cars and currently there isn't one." (Public, aged 35-54, Other Vehicle)*

> *"I think they should really be focusing on people, encouraging people to get on public transport and upgrading the public transport and not penalising the cab drivers and the taxi drivers." (Focus Group: Public, aged 18-40)*

There were concerns amongst some respondents that if enough funding was not provided to help bus operators and PHV drivers upgrade, the costs would be passed on to customers, which could disproportionately impact vulnerable users:

> *"I support this. If the bus companies aren't given financial support, the only people who will lose out will be members of the public who rely on bus travel as the companies will increase fare prices to accommodate with the additional costs." (Public, aged 18-34, Private Car)*

> *"All hackney carriages / taxis should be eligible for support and the funding amount should be the majority of the cost it would take to upgrade their vehicles. Otherwise they won't be able to afford to do it. And the cost of the fee if their vehicles are not green enough would just be passed on to passengers - disproportionately affecting disabled people who rely on these vehicles." (Public, aged 35-54, Private Car)*

6.2.2 Funding amounts

Comments about the funding amounts for each fund included:

	Clean Bus Fund (CBF)	Clean Commercial Vehicle Fund (CCVF)	Clean Taxi Fund - Hackney (CTF – Hackney)	Clean Taxi Fund - PHV (CTF – PHV)
Funding should be higher for [fund]	51	76	57	47
All companies / operators work in Greater Manchester and will be affected should be eligible	30	491*	18	15
Base	**80**	**567**	**78**	**64**

* The consultation identified two email campaigns (**see section 2.2.2** for details). This point was mentioned in the CAZ support campaign emails making up almost all (n=484) of these comments.

Funding should be higher: Several comments were received from members of the public expressing concern the proposed funding amounts were not enough in the CBF (n=51), CCVF (n=76), CTF - Hackney (n=57) or CTF - PHV (n=47):

> *"You're going to need a lot more funding for this element, because bus operators on average keep their fleet for between 10-20 years and with them costing well over £100,000 each for the majority of vehicles, they will need more money before 2023 to be convinced to upgrade them- especially to hybrid or electric as they are even dearer." (Public, aged 18-34, Private Car)*

"The grant limit for both bus and coach of £16,000 per vehicle is not a true reflection of the cost of retrofitment and we understand it was based on average cost, setting a higher limit would be fair and equitable." (Organisation, CPT)

"In summary, the funding package is inadequate. As a minimum, the funding envelope should cater for all 6615 affected HGVs which, on the grant amounts specified under section 5.5, would imply a fund of at least £30m for HGVs. However, the grant amounts specified are in themselves inadequate to bridge the market-value gap between Euro V and Euro VI vehicles." (Organisation, Road Haulage Association)

"These operators (both hackney carriage and private hire car drivers) are self-employed and have been severely hit recently by the lockdowns. Many of them have operated during the restrictions and have provided a service because they would have no income otherwise. Under normal circumstances, they make very little profit and so they should be given priority and to the maximum amounts." (Public, aged 55+, Private Car)

The view of owners of each type of vehicle on the levels of funding are discussed in the following sections.

All vehicles that operate in Greater Manchester and will be affected should be eligible (CBF n=30; CCVF n=491; CTF - Hackney n=18; CTF - PHV n=15): Several mentions were made about vehicles registered outside GM but operate within, with some feeling these should be eligible for funding. This was particularly mentioned by the CAZ support group campaign about vehicles covered by the commercial fund (n=484):

"Government to provide financial support to help those individuals and businesses who need to change to cleaner vehicles." (CAZ support group campaign email)

"Coaches that come into greater Manchester bring vital business for our towns so they should be helped to - and our local coach companies should have money to so that they can change." (Public, aged 35-54, No Vehicle)

"Business that are based or operate in the city should not be penalised and should receive any help where possible to mitigate excess charges." (Public, aged 18-34, Private Car)

"Inevitably, those who live outside GM but spend time working in GM may feel disadvantaged and less willing to travel into GM to work, e.g. trades people from outside GM will be disadvantaged when working in GM to those who are based in GM." (Public, aged 55+, Private Car)

"This is unfair to taxi drivers just over the border of GM. It gives GM taxi drivers an unfair advantage." (Public, aged 35-54, Private Car)

"I think taxi drivers who can prove they live and work in GM regardless of where they are licensed for should get financial help." (Public, aged 35-54, No Vehicle)

6.2.3 Oppose the funding

Comments received against each of the funds included:

	Clean Bus Fund (CBF)	Clean Commercial Vehicle Fund (CCVF)	Clean Taxi Fund - Hackney (CTF – Hackney)	Clean Taxi Fund - PHV (CTF – PHV)
Funding should not be available / not needed – should have already upgraded by now/use own money (general)	193	57	181	139
Funding / financial support will not help / work (e.g. will not help in the long-term)	0	16	0	0
Don't agree with fund because don't agree with charges	1	6	5	7
Funding amount is too high / too much funding (general)	15	3	8	17
Base	**206**	**81**	**193**	**159**

Reasons respondents were against the fund included:

Funding should not be available/not needed – should have already upgraded by now / use own money: Several comments were received opposing funding being available, particularly for CBF (n=193), CTF - Hackney (n=181) and CTF-PHVs (n=139). Fewer comments were received about vehicles covered by the CCVF (n=57). The main reasons given included:

- **Public funding should not be used to support private companies:** some felt these companies should not receive public funding as the need for funding was greater for others:

  "Public money should not be used to support private companies get their houses in order." (Public, aged 55+, Private Car)

  "I disagree that such support should be provided. Public taxpayers' money should not be squandered to underwrite the costs of private enterprise and businesses." (Public, no age provided, LGV)

  "The funding should go to only buses and taxis. Businesses should fund their own vehicles from their profits. After all, it's tax deductible." (Public, aged 55+, LGV, Private Car)

  "They should be able to do this with all the profits they are making if not they wouldn't be running a company why should we support this from our taxpayer's money they have big pockets let them pay." (Public, aged 55+, LGV, Private Car)

- **Companies should have already upgraded their vehicles:** many responses were opposed to the funding being made available as they felt companies have had time to upgrade their vehicles:

  "I do not think large companies such as [bus operators] should be able to get benefit from this, as they should have been investing in cleaner vehicles for a long time now." (Organisation, Friends of the Trans Pennine Trail)

  "I'm not sure taxpayers' money should pay for this, when black cab drivers have already been over charging us all for years. Its normal to have to replace a car every once and a while, especially when it is your profession so I'm not sure they should be funded at all." (Public, aged 18-34, No Vehicle)

- **Companies can afford the costs / should use the money from their profits:** there were also comments opposing the funding, declaring many companies have the money to make the changes themselves:

  "Bus companies should plan and fund vehicle upgrades through their company profits or return ownership to local authority. Why should the taxpayer fund new vehicles whilst company bosses continue to take a dividend?" (Public, aged 35-54, LGV)

- **Funding amount is too high / too much funding:** (CBF n=15; CCVF n=3; CTF-Hackney n=8; CTF-PHV n=17): Some comments mentioned the funding amount was too high, in addition to opposing companies receiving funding:

  "I think the fund is excessive. Lots of the buses in Manchester are a disgrace. These companies should have some corporate responsibility to not poison our air." (Public, no age provided, Private Car)

  "Just don't give them too much, they should have been investing in this tech years ago." (Public, aged 34-54, Private Car)

6.2.4 Operation of the scheme

Comments received about the operation of each of the funds included:

	Clean Bus Fund (CBF)	Clean Commercial Vehicle Fund (CCVF)	Clean Taxi Fund - Hackney (CTF – Hackney)	Clean Taxi Fund - PHV (CTF – PHV)
Funds should only be for voluntary / community organisations / charities / services	0	49	0	0
Concerns about where funding is coming from for this/transparency over funds	31	29	52	25
Funding should only be for sole traders / smaller companies	17	20	15	6
Funding should not come in the form of a repayable loan / should be given as a lump sum grant	0	6	2	1
Funding should only be provided to upgrade to hybrid / electric vehicles	61	13	36	18
Funding should only be available to Taxis licensed in Greater Manchester	0	0	20	17
Funding should be provided as a repayable loan / not given as a grant	14	13	18	11
Payment of funds	12	0	2	0
Base	**133**	**622**	**142**	**76**

Key comments regarding the operation of the scheme included:

Concerns / queries about where funding is coming from for this / transparency over funds (CBF n=31; CCVF n=29; CTF-Hackney n=52; CTF-PHV n=25): Some comments from respondents queried where the funding would come from, particularly for the funding of Hackney Carriages, with fears the public / taxpayer would be funding the scheme:

"Who's paying for this? Where's the money coming from." (Public, aged 55+, Private Car)

"Who pays for this funding. Yes, us local taxpayers. Yet another example of local authorities spending our money in ways not asked for by the population..." (Public, aged 55+, Private Car)

"It is as it is but this vague there's going to be funds here and grants here, until you know what the criteria is, it doesn't really mean anything does it." (Focus Group: Minibus, Coach)

Funding should only be for smaller companies (CBF n=17; CCVF n=20; CTF-Hackney n=15; CTF-PHV n=6): Respondents mentioned the funding should only be available for smaller companies, with several comments stating larger companies did not need more support:

"Most of the smallest bus companies use ageing buses. It would better to get them to purchase new buses/coaches or help them in doing so. The big bus companies can look after themselves." (Public, aged 55+, Private Car)

"Money should be filtered down to the smaller operators instead of the bigger bus companies receiving all the benefit, the larger companies have more financial backing from investors/banks whereas the smaller family run companies may not have the assets/banking backing." (Business, Bus, Coach, Minibus)

Funding should only be provided to upgrade to hybrid / electric vehicles (CBF n=61; CCVF n=13; CTF-Hackney n=36; CTF-PHV n=18): Several responses made a reference to the funding only being provided to operators if they upgraded to low emission vehicles (e.g. hybrids and electric), with comments highlighting the importance of improving air quality:

"Maximum funding should only be available for replacement vehicles that are zero emission." (Organisation, MESS (Marple Energy Saving Strategy))

"Eligibility should be for hybrid that can run on zero emission in the relevant zones or full zero emission vehicles this should also include coaches and school buses that are major polluters." (Public, aged 55+, Private Car)

"No diesel-powered vehicles should be purchased - preferably battery electric only." (Public, aged 35-54, Private Car)

Funds should only be for / prioritised for voluntary / community organisations / charities/services (CCVF n=49): Several comments felt funding should only be for Voluntary, Community and Social Enterprises (VCSEs). There were calls VCSEs should be 'prioritised' before commercial trades due to their 'importance' and 'social value':

"Voluntarily, community and social enterprises should be supported before any commercial operations." (Public, aged 55+, Private Car)

"I would support vehicles for charitable status organisations as a priority, since those are already recognised as having social value…." (Public, aged 35-54) No Vehicle)

"Voluntary, Community and Social Enterprise (VCSE) organisations must get full support. The Covid-19 pandemic has demonstrated the sheer importance of these organisations." (Public, aged 35-54, Private Car)

Payment of funds (CBF n=12; CTF-Hackney n=2): A few comments from those who responded made additional suggestions regarding who should be funded. Suggestions included only paying those who have already upgraded their vehicle(s) and only releasing funds after new equipment / vehicles have been invested in rather than in advance of upgrading:

"There needs to be a strong deterrent to driving dirty vehicles, and those with cleaner tech should be rewarded." (Public, aged 35-54, Private Car)

"There needs to be a way to ensure that this funding is not used to effectively subsidize bus companies who have continued to run older polluting vehicles or failed to invest in modernizing their fleets. Perhaps the funding could be weighted in favour of companies that have already gone part of the way to modernizing their buses..." (Councillor / Elected Official)

6.2.5 Other

Other comments received included:

	Clean Bus Fund (CBF)	Clean Commercial Vehicle Fund (CCVF)	Clean Taxi Fund - Hackney (CTF – Hackney)	Clean Taxi Fund - PHV (CTF – PHV)
Queries about the proposals / information not clear - general comments	73	80	40	33
Out of scope for proposals – impact /l ack of enforcement of taxis registered outside of Greater Manchester (e.g. in Sefton)	0	0	0	31
Out of scope for proposals – impact / lack of enforcement of Uber	0	0	28	19
Concerns about availability of electric charging infrastructure / need more charging points	5	9	22	8
Concerns about performance of electric vehicles	4	4	3	1
Other	64	43	24	18
Base	**185**	**134**	**109**	**92**

Queries about the funding amount / provision / conditions (CBF n=73; CCVF n=80; CTF-Hackney n=40; CTF-PHV n=33): Several respondents had queries about the proposals in terms of the funding amount / provision and conditions:

"Doing a quick estimate based on the costs of a new bus, £30M approximates to around 150 new buses purchased, so is this figure really enough to upgrade the Greater Manchester bus fleet?" (Organisation, The Northern Care Alliance NHS Group)

"Agree this can be done if bus companies are engaged correctly" (Public, aged 18-34, Private Car)

Out of town taxis: Some respondents voiced concerns about the impact of out of town taxis (CTF-PHV n=31) and Uber (CTF-Hackney n= 28; CTF - PHV n=19) on the taxi and PHV trade in Greater Manchester. Some were concerned there was a lack of enforcement on such taxis and local businesses should be prioritised:

"Only comment is to ensure all vehicles are owned and Licensed in Greater Manchester. As a former private hire owner / driver, I was aware of drivers from other authorities continually working in the Stockport area which was unfair and took work

away from me as a Stockport resident and tax payer. I was also aware of drivers letting unlicensed drivers use their vehicles!!" (Public, aged 55+, Private Car)

"All PH vehicle owner working In Manchester regardless of council they associated with should be treated equally…….they shouldn't be discriminated against. as hundreds of GM residents PHD now opt to go with Sefton, Wolverhampton councils as they are cheap and hassle free as compared to local councils. (Business, PHV)

"With the amount of work left for Hackney carriage drivers in Manchester [as] cross border plying for hire started stealing all the work and council not being able to put a stop to this theft of work from Hackney trade" (Business, Hackney)

6.3 The Clean Bus Fund – Bus operators

Anyone who is registered to run a commercial bus service in Greater Manchester is eligible to apply for funding. Not everyone who runs a bus service owns a bus: some are coaches for example, used for school services. There are very few bus operators in the data therefore, their responses have been collated in this section.

There were 46 respondents who completed a questionnaire who owned at least one bus. In addition, six emails were received from bus operators. From the questionnaire, two respondents commented on why the fund would not meet their needs:

"Strongly believe the costs will increase to meet the new demand." (Business, Bus / Coach)

"We await confirmation of eligibility for funding of all vehicles but are confident are a good solution can be agreed with TfGM." (Business, Bus / Class V Training Bus)

In terms of the emails received from stakeholders, these were some key points made from bus operators:

"We welcome the aim of the Fund and understand the management and distribution. We do however recognise the shortfall against the initial ask and have some concern that there may be a shortfall in the number of compliant vehicles at the time the charging is introduced. There could also be delays in supplies of the necessary kit which may lead to installations being delayed or suspended." (Business, Bus)

"We encourage TfGM to maximise retrofit and other measures and then take stock of whether CAZ is still required." (Business, Bus)

"The grant limit for both bus and coach of £16,000 per vehicle is not a true reflection of the cost of retrofitting, and we understand it was based on average cost, setting a higher limit would be fair and equitable." (Organisation, CPT)

"The contribution of £16,000 is unlikely to be sufficient to make a case for investment. It is around 50% of the typical cost of a ten year old vehicle and if there are 350 vehicles to replace, there is likely to be a significant supply issue which could cause a price rise. Operators may also need to dispose of vehicles at a loss as the market price for a 13 or 14 year old vehicles is unlikely to exceed the book value" (Business, Bus, Coach)

6.4 The Clean Commercial Vehicle Fund – Van owners

Of responses from businesses, 598 had at least one van or LGV. Of which, 90% thought they would currently incur a charge when the CAZ is introduced. Under the proposals, businesses with vans will be able to apply for a replacement grant of up to £3,500 per vehicle or vehicle finance offer (see section 6.10).

However, just 29% (n=159) thought they were eligible for the fund even though the majority were based in Greater Manchester and therefore would be eligible for support.

The main comments given by business van owners about the funds included:

Support the proposed funding / funding is needed to be able to conform / upgrade (n=36): There was some support amongst van owners for the funds, and a further 11 re-iterated the need for funding to cover all types of vehicles and be fair to all:

> *"This will be massively welcomed. The cost of buying a new vehicle would put massive strain on our small business and would take years for us to have enough capital to purchase. Financial support would make this more realistic for us by 2022." (Business, LGV)*

> *"I think it is very important to support the smaller businesses and sole traders. We are going to need help with the new vehicles." (Business, LGV, HGV)*

Unfair to those located outside the boundary / should be funding to those located outside the boundary but operate in GM: Some concerns were raised (n=15) about the impact on those with businesses located just outside of the boundary but operate within it:

> *"It should be extended to those outside GM that have to travel into GM. We enter an average of twice per week so would cost around £1000 to supply goods into Manchester." (Business, LGV)*

Just 17% (n= 27) thought the funding would meet their needs. The main reasons van owners' needs would not be met included [the comments below have been drawn from across the questionnaire]**:**

Need more funding (n= 67): A large proportion simply said they need more funding, with a further 10 stating they needed funding to cover 100% of the cost of the vehicle. A couple also stated the proposed funding does not consider other costs such as insurance and customisation (n=2):

> *"£3.5k to purchase a new van. Have you tried purchasing a used LGV before, as this goes no way near the cost involved. My business can't afford or justify the purchase of a much newer vehicle." (Business, LGV)*

> *"The price of electric vehicles might change over the next 2 years. If the second-hand market doesn't increase, £3,500 would not help us to buy a brand-new electric vehicle." (Business, LGV)*

> *"Can't get a euro class 6 vehicle that isn't falling apart for the funds offered, can't get or afford finance. Can't even get a BBL because all lenders have locked it down to existing clients only" (Business, LGV)*

> *"I purchased a van with a euro 5 engine last year for many £1000`s. The introduction of these charges would effectively reduce the value of my van to scrap value, (who would buy it?) Therefore, the grant offered towards a new van would nowhere near compensate for my loss." (Business, LGV)*

Financial support will not help (n=15): Those with specialist vehicles did not feel the financial support would help as they could not easily change their vehicles regardless of the level of funding:

> *"Because we are the last in the queue as a small business/partnership! We have the ideal van for our business purposes. This is no longer produced - shape has changed which reduces weight and load capacity. We have tried looking around for a replacement but cannot find one due to these requirements" (Business, LGV)*

> *"it still requires too much investment from the business, our vehicles are not just vehicles, the have to have custom made fittings in the cargo area which can also run up to £3000-£4000 on top of the price of the vehicle, we cannot remove the systems from the old vehicles to the new. (Business, LGV)*

Cannot afford to upgrade my vehicle/s (n=86): Many said they could not afford the additional cost at the moment to upgrade, particularly due to the current situation and

uncertainty about future work (this is reported more in section 7.3 in relation to the impact of Covid-19):

> *"Will you be providing a small business with a sufficient van? I only purchased my low mileage van this year so can't afford to go out and just buy or loan a new one. There's only 2 of us in our business and on limited work more than ever after this year we need help not a charge to pay." (Business, LGV)*

> *"I bought a brilliant used van for £6k with 25000 miles on the clock. It's 12 years old but provides the perfect solution for my business. Affordable, reliable and smart. I'd have to chip in at least an extra £10k IF I got a £5k grant. My business activities have been decimated by Covid already. We simply don't have the money - we have negotiated our rent and cut back on all costs possible to try and survive. A van upgrade is very unlikely. I have no money." (Business, LGV)*

> *"The money you are suggested is available is about 1/3 the cost of a new van. Selling my current vehicle would raise another couple of grand but to expect me to pay out £6000 of my own money in the next couple of years with the current loss of revenue is wrong." (Business, LGV)*

Some predicted because of the devaluation of their current vehicles (n=19) and the expected increase in prices of compliant vehicles (n=16), they felt the gap in funding would be even greater.

Queries about the fund: Many comments referred to the uncertainty they felt about what they would be eligible for (n=80) and therefore, were unable to say whether it would meet their needs:

> *"Presently we run 5 vans (NI) which would fall outside exemption rules due to area. From the consultation documents we understand we are eligible for £3,500 towards a compliant/newer vans. All our vans are modified for specific roles in roadside assistance, miss fuel drain, rapid deployment trailer. Could this type of van (not HGV) be exempt as would be a larger converted vehicle?" (Business, LGV, HGV)*

> *"And if part of its, if the charges don't cover the funding, then where is the money for the funding coming from, is that central Government?" (Focus Group: LGV)*

> *"If you're a scaffolder and you've got a twelve ton truck, that is your specialist HGV, because it saves you having a group of five lads hand boarding a load off. So what you define as specialist and what I define as a specialist is …. it's open to interpretation." (Focus Group: HGV, LGV)*

6.5 The Clean Commercial Vehicle Fund – Business HGV owners

Of responses from business, 143 had at least one HGV. Of which, 90% thought they would currently incur a charge when the CAZ is introduced. Under the proposals businesses with HGVs will be able to apply for a replacement grant of up to £16,000 towards retrofit to a compliant standard or a replacement grant which is dependent on vehicle size, the following funding amounts are proposed:

- 44t articulated up to £4,500 per vehicle
- 32t rigid up to £5,500 per vehicle
- 26t up to £4,500 per vehicle
- 18t up to £3,500 per vehicle

However, just 29% n=38 thought they were eligible for the fund even though the majority were based in Greater Manchester and therefore would be eligible for support.

The main comments given by HGV owners about the funds included:

Support the proposed funding / funding is needed to be able to conform / upgrade: There was some support for the funding (n=15), with some re-iterating the need for it to be available to all (n=5):

> *"Yes funding for HGV upgrade very welcome if it means no daily tax and Is not repayable" (Business, HGV)*

> *"As I will have to change my hgv and my van any finance aid would be welcomed" (Business, HGV, LGV)*

> *"Welcome funding to help financially to up grade vehicle to become compliant." (Business, HGV, LGV)*

Funding should be higher for vehicles / provide a higher amount to those affected (n= 22): Several respondents in their comments strongly felt the amount should be increased. HGV owners heavily criticised the current proposed funding as being 'inadequate' and not sufficient to help buy replacement vehicles:

> *"HGV funding is nowhere near enough. You are proposing a £5500 grant towards replacing a vehicle costing £50k upwards to replace. Leeds CAZ were granting £16000 per vehicle (we were granted £32000 towards the replacement of 2 vehicles) You are proposing a £16000 grant towards a retrofit solution. There are no such solutions available, so this is a meaningless offer." (Business, LGV, HGV)*

> *"Regarding our line of work, I've been heavily involved in it, especially with the vehicles update, because one of our specialist vehicles, in excess of 250 tons, so the replacement vehicle we purchased last year actually came, I think it cost just under a quarter of a million pounds to replace one vehicle. So, you sit there and you look at it, obviously the ongoing extent is with the low emission zone come in and the reinvestment in equipment, just to keep it within this low emissions bracket, it does have quite a knock-on effect with obviously profit margins and everything else." (Focus Group: HGV)*

The additional costs were mentioned, in particular insurance and modifying vehicles:

> *"Insurance for electric commercial vehicles is a significant problem, there is only one insurer prepared to offer cover and it is exorbitant. This failure of the insurance market needs to be taken up by the Govt." (Organisation, FSB)*

Just 26% (n=10), thought the funding would meet their needs: The main reasons HGV owners' needs would not be met was the large gap between the proposed funding amount and the cost of a new vehicle (n=3). The devaluation (n=6) of current vehicles also added to the amount of funding they would need to be able to upgrade. Many said they cannot afford to upgrade their vehicle/s (n=29):

> *"The cost of replacing the vehicles would leave me with a financial short fall of £35,500 for a second hand or £90,000 for brand new. 'Up to' £4500 is nowhere near enough." (Business, LGV, HGV)*

> *"£5500 grant towards replacing a vehicle costing at least £50,000 is not a viable solution." (Business, LGV, HGV)*

6.6 The Clean Commercial Vehicle Fund – Coach / minibus

Of responses from business, 70 had at least one Coach or Minibus. Of which, 89% thought they would currently incur a charge when the CAZ is introduced.

However, just 24% (n=15) thought they were eligible for the fund even though the majority were based in Greater Manchester and therefore would be eligible for support.

Just 33% (n=5), thought the funding would meet their needs: However, many of the responses from coach operators came via email or participation in the Focus Groups; how many said the proposed fund would or would not meet their needs cannot be quantified. Below is a summary of the response given from coach operators.

Several comments remarked on the criteria being unfair to the coach companies located outside the boundary and funding should also be provided to them. Reasons for extending the funding to outside the boundary included concerns of the impact to services without financial assistance:

> *"We operate coaches into and out of GM to schools in Orrell, Leyland, and Macclesfield. The services only just cross the outer borders to either collect or deliver students and do not venture into the centre. Since we do not have a depot based within GM we believe this means we would not qualify for grant assistance. We would prefer it if this could be reconsidered as the effect on these services would be significant..." (Business, Coach, LGV)*

> *"These proposals, set out in the consultation document, are comprehensive and detailed…. However, they unreasonably and unjustifiably discriminate against businesses operating into Greater Manchester from beyond the boundaries of Greater Manchester, and scheduled express coach operators in particular, who are neither eligible for a time-limited local exemption, or any financial support to comply. (Business, Coach)*

> *"They're doing the complete opposite than what is needed. They're making it more expensive to go into Manchester in an environmentally friendly vehicle, but it's Euro 4 or Euro 6, just by the sheer number of people we'd be carrying. I think the advantages to being in Greater Manchester are completely unfair to operators that are outside, you know, they're getting an extra nine months, they're getting the extra funding to do it and the nine months." (Focus Group: Minibus, Coach)*

Coach companies based outside GM highlighted they would be unlikely to invest, especially as they would not be entitled to support. Costs would have to be passed to customers and, therefore, they are likely to move business away from Greater Manchester. For example, some of the package day trips they offer to areas other than Manchester to maintain their competitiveness:

> *"Well, I think from my point of view it's penalising the people that are bringing revenue into the city. To all the businesses in the city that we bring people to, then it's penalising those people, because we're not going to do it, because I'm not going to invest in Euro 6 vehicles, not in the immediate future anyway, not at least in the immediate future, no way. Ultimately the passenger is going to pay the cost. You're penalising operators outside of Manchester whilst giving them grants while they're inside Manchester and extending the time limit for them. That's unfair on the industry as a whole. Yeah and you're devaluing everybody's fleet, whether they're in Manchester or they're not, by bringing this in you are devaluing their fleet." (Focus Group: Minibus, Coach)*

> *"And so, you know, if we say, oh, Manchester Christmas markets 460 or you can go to Liverpool market for 400. Bye bye Manchester." (Focus Group: Minibus, Coach)*

> *"But there might be the issue that if they don't want to pay, so you say to them it's £200 to go to Chester, it's £260 to go to Manchester, they're just going to pick to go somewhere different. And so Manchester loses as well, doesn't it, because they haven't got the tourism coming in." (Focus Group: Minibus, Coach)*

A number of the coach and minibus operators in the focus groups felt the Fund will not go far enough to help them, especially in current circumstances. Most gave examples of the cost of a vehicle and the gap between the proposed funding and the cost of a new vehicle. Most did not feel they would be able to get the finance required to bridge the gap:

"Well to give you an idea, a Euro 6 coach is £250,000, we have fourteen vehicles, that would be over £3 Million pounds and our annual turnover is £450,000, so you tell me how we're supposed to do that?" (Focus Group: Minibus, Coach)

"We're all really struggling at the minute, like everybody here with the Covid. I have spoken to my MP about this and they've offered us £16,500 which is nowhere near - where we're supposed to get the rest of the money from." (Focus Group: Minibus, Coach)

"It's £5,000 towards a minibus and to get a Euro 6 even a Ford Transit you're looking at about £27,000 so £5,000 towards that is another £21,000 per vehicle times three, so it's a big debt that you're getting yourself into for the sake of earning not enough." (Focus Group: Minibus, Coach)

There is also some mistrust if they did upgrade, the criteria could change again:

"I'm thinking that currently Euro 6 it is, what's the next step, do we go Euro 7, Euro 8? When do we get to the point where we're not constantly improving air quality and they're constantly passing costs on to smaller companies, because the major of wagon companies are quite large fleets. The majority of coach companies, there's more small operators that run four or five, six or eight vehicles, where does it stop and ultimately, we as operators have to cover those costs, it has to come from somewhere and where it comes from is our customers." (Focus Group: Minibus, Coach)

6.7 The Clean Commercial Vehicle Fund – Leisure vehicles and vans owned by the public

Under the proposals, members of the public who own a van or are owners or registered keepers of leisure vehicles (>3.5t) in private ownership, (e.g. motor caravan >3.5t), motorised horse box (>3.5t) would be subject to the daily charge if their vehicles are non-compliant.

They are therefore eligible to apply for funding via the Clean Commercial Vehicle fund.

Not all respondents detailed the type of vehicle they had, but of those we could identify, 262 had an affected vehicle, of which 95% thought they would be impacted by the clean air zone. However, just 16 thought they would be eligible for funding support; many lived outside the boundary, but many did not think they would be eligible because they are not a business.

Just three respondents felt the funding would meet their needs: The most commonly received comments from these groups were:

- **Funding needed for / concerns about funding for personal leisure vehicles e.g. campervans, horseboxes etc** (n=70): The comments centred around the cost of upgrading their vehicles. As with other affected, vehicles the devaluation on their current vehicle increases the amount of funds they need to secure:

  "Funding won't go far enough. Not with specialist vehicles, because to me a horsebox is a specialist vehicle, you know, it's not just a box, you know, there's a lot of things that go into making that safe to transport up to three half ton animals at the end of the day." (Focus Group: Public HGV owners)

  "Looking at the second-hand value of non-compliant vehicle # 1 and the likely replacement cost of a compliant vehicle there is a significant gap. This is without taking into account that the proposals may lead to a drop in value of non-compliant vehicles and an increase in cost (due to supply issues) of compliant vehicles. With regard to non-compliant vehicle #2 this is a vehicle made by Land Rover special vehicle operations for West Yorks fire service and now in private ownership - A direct replacement (or similar) for this vehicle does not currently exist. There will be many businesses and publics in or close to the Manchester in a similar position." (Public, aged 35-54, LGV, Private Car)

- **Queries about the proposals / information not clear** (n=67): There was confusion amongst this group about the funding available as the following quote illustrates:

  "You are treating private campervans as commercial vehicles when it comes to charging but not compensating the owners of these vehicles to fund replacement vehicles which are much more expensive than commercial vehicles as they are specialist vehicles." (Public, aged 55+ Other Vehicle)

6.8 The Clean Taxi Fund – Hackney

In total, 165 respondents owned a hackney carriage. Of which, 84% thought they would incur a charge when the CAZ is introduced. Respondents were provided with a summary of the proposed financial support offered to hackneys through the Clean Taxi Fund, including the following grant levels:

- A grant of up to £10,000 will be available towards the running costs of a purpose-built wheelchair accessible zero emissions capable vehicle (ZEC); or
- Access to vehicle finance towards the cost of upgrade to a purpose-built wheelchair accessible ZEC vehicle, offering an average finance contribution of £10,000, with the total finance contribution capped at £14,000; or
- A grant of £5,000 towards the LPG retrofit of a Euro 5 vehicle less than ten years old will also be available.

75% (n=103) thought they were eligible for the fund.

The main comments received from hackney carriage drivers included:

Support the proposed funding for Hackney carriages: Some (n=10) expressed their general support for the funds and stressed their need for funding to be available to all (n=32):

"Desperately Needed - you may end up with a vastly reduced fleet of vehicles." (Business, Hackney)

"All help would be greatly appreciated." (Business, Hackney)

"We need it badly as we have all been affected by this pandemic." (Business, Hackney)

Funding should be higher for hackneys: Nearly half of hackney respondents who commented felt funding should be higher (n=61), with some commenting they should be funded for the total cost of a hackney or provided with a compliant vehicle. Reasons for this included the high cost of upgrading to a compliant vehicle, which some felt would be prohibitive even with provision of financial support:

"Definitely taxi trade need significantly more funds to meet the standards because this trade is completely dead at present time, we taxi drivers earning less than minimum wage. We taxi drivers really worried to keep our livelihood safe might we end up unemployment queues." (Business, Hackney)

"The eligibility should be opened, and the fund increased to make it viable to continue as a hackney carriage driver. Currently it does not go far enough in supporting the drivers." (Business, Hackney)

Should be support / reimbursement for those who have already upgraded: There was concern amongst some hackney respondents the funding was unfair to those who had recently upgraded their vehicles. Six respondents commented there should be financial support or reimbursement available in such cases. Some felt those who had acted responsibly by adopting greener vehicles were being penalised:

"I feel that this situation has been going on for quite some time and the uncertainty surrounding the trade and the clean air zone has added more pressure to an already horrendously pressurised job. I myself with this in mind and with the relevant

information at the time plumped for a Euro 6 vehicle when I changed my vehicle and feel I should be able to claim some funding back on this." (Business, Hackney)

"Subsidy has got to be available to early adopters as promised as we only upgraded due to the age or condition of our previous vehicle we should not be penalised for complying." (Business, Hackney)

Electric Vehicles: Although there were many comments in support of electric taxis, there was concern from some hackney respondents about the performance of electric vehicles (n=4) and availability of electric vehicle infrastructure (n=7):

"Electric vehicles are nearly double the old vehicles and they are not affordable. The infrastructure for charging is non-existent, hence not yet ready for the switch." (Business, Hackney)

"70,000 miles he said he'd done, and his batteries are goosed, and he didn't realise how much the batteries were. It's all right for 180 miles, then you get 160 miles and as the batteries start to die and get weaker and weaker you start getting electrical problems, you're getting forty miles, fifty miles, you've got to replace them for new ones then. So that's the problem with having electric vehicles on, good for the environment, but rubbish for the job, unless Tesla with their million-mile battery come along with a decent priced vehicle." (Business PHV operator)

Just 19% (n=20) of Hackney Drivers felt the funding would meet their needs, and this is discussed more in section 6.9.1.

6.9 The Clean Taxi Fund – PHV

In total, 201 respondents owned a private hire vehicle, of which 97% are licensed in Greater Manchester. Respondents were provided with a summary of the proposed financial support offered to PHVs through the Clean Taxi Fund, including the following grant levels:

Private hire wheelchair accessible vehicle or minibus:

- A grant of £5,000 towards the cost of a compliant 6+ seater vehicle; or
- Access to vehicle finance, offering an average finance contribution of £5,000, with the finance contribution per vehicle capped at £7,000.

Non-wheelchair accessible PHV:

- A grant of £1,000 towards the cost of a compliant internal combustion engine vehicle OR access to vehicle finance, offering an average finance contribution of £1,000, with the finance contribution per vehicle capped at £2,000; or
- A grant of £2,000 towards the cost of a compliant hybrid or plug-in hybrid; or
- Access to vehicle finance, offering an average finance contribution of £2,000, with the finance contribution per vehicle capped at £3,000; or
- A grant of £2,500 towards the running costs of a ZEC vehicle.

Half 54% (n=81) of PHV drivers thought they would be eligible for funding.

Respondents were asked if they had any comments on the proposed funds for PHVs. A total of 78 PHV drivers provided a comment.

Support the proposed funding for PHV: Some (n=19) expressed their general support for the funds and stressed their need for funding to be available to all (n=23):

"We will definitely need financial support to change vehicles." (Business, PHV)

"Yes, it is important to support private hire drivers to upgrade their vehicles." (Business, PHV)

Funding should be higher for PHVs: Over half (n=44) of PHV respondents felt the funding offer should be higher. Some felt they should be given the total cost of a replacement or provided with a compliant PHV vehicle:

> *"If you want me to upgrade my vehicle to your standards then you have to support it reasonably so I can upgrade it, or it's not going to be worth it, especially during this Covid crisis." (Business, PHV)*

> *"Funding has to be enough to cover the full cost of upgrading the vehicle, otherwise it's not useful." (Business, PHV)*

Should be financial support for those who have already upgraded: Of those who commented, four PHV respondents felt financial support or reimbursement should be available for those that have recently upgraded. Some felt the plans would otherwise be unfair to those who had already upgraded on their own accord:

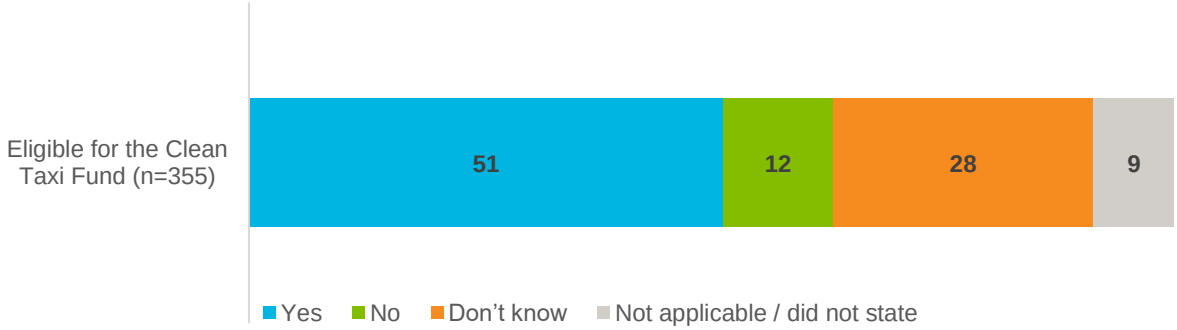
> *"I hope some help would be given to Private Hire owners who previously invested in low emission/ Hybrid vehicles. Being someone who purchased hybrid vehicles an increased expense it is getting harder to replace with the same as prices increase. I feel like I'm being penalised for purchasing my vehicles earlier than some owners." (Business, PHV)*

Half (51%) of PHV Drivers felt the funding would meet their needs.

6.9.1 Would the Clean Taxi Fund meet Hackney and PHV needs?

About half (51%) of respondents considered themselves to be eligible for funding or the try before you buy scheme.

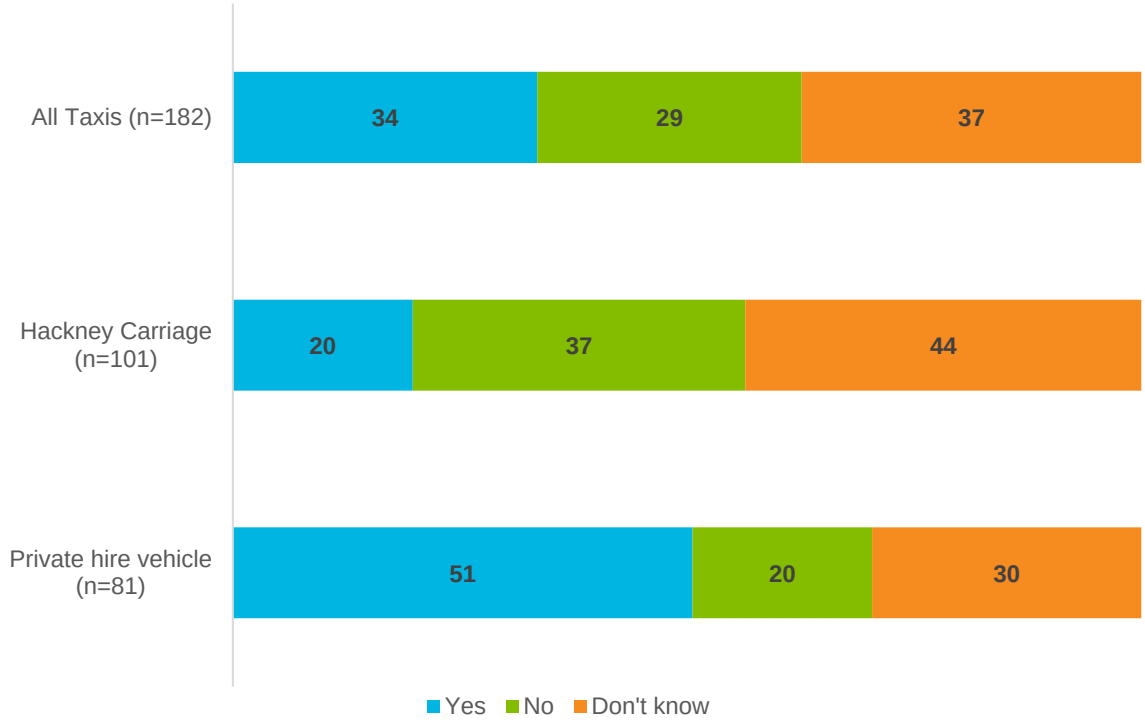
Figure 6.1 Taxi drivers stating they could be eligible for funding (%)



Base: all with taxi vehicles

Although half (51%) of PHV drivers thought the funding would meet their needs, only 20% of hackney drivers did. A high proportion did not know if the funding would meet their needs (30% and 44% respectively).

Figure 6.2 Would the funding meet taxi driver needs (%)



Base: All who own a taxi vehicle

6.9.1.1 Reasons the funding will not meet taxi or PHV driver needs

A total of 54 drivers responded to this question who owned a taxi, either a PHV or hackney. The main themes that emerged through the comments related to funding were queries about the funding or concerns it wasn't enough, and how the pandemic has impacted the future and the financial hardship they are currently experiencing. The main reasons respondents gave for their position are described in the following sections. The comments below have been drawn from across the questionnaire.

Funding not enough: Over a quarter of the comments stated the Clean Taxi Fund would not meet their financial needs as compliant vehicles were too expensive and the proposed funding too low. Some respondents were concerned the Clean Air Plan would result in increased demand for compliant vehicles, which would further increase vehicle costs.

Comments from Hackney drivers:

> *"The funding of up to £17500 is not enough, new electric vehicles are rubbish, there is not enough work in the trade to justify paying these prices." (Business, Hackney)*
>
> *"To replace my vehicle with a CAZ compliant one at the present time would cost me £25000. To go fully electric without taking a drop in the standard of my vehicle would cost £60000. Offering £5 -10K doesn't cut it." (Business, Hackney)*
>
> *"Vehicle Suitability of electric vehicles is not the main issue. It's cost and running costs and charge points." (Business, Hackney)*
>
> *"Funding is not enough, and the monthly payments will not be affordable." (Organisation, Tameside Owners & Drivers Association)*
>
> *"If somebody offered me 10 grand to go and buy a new vehicle I wouldn't accept it, because you're still looking at £30,000 finance, do you know what I mean, £30-40,000 finance." (Depth interview: Hackney driver).*

Comments from PHV drivers:

> *"If the Government allows a less then [sic] 5 year old private hire car then they should support more because £1000 for private hire is nothing. New cars are very expensive. No one can afford by himself. So the Government should increase the funds and also arrange financing for easy monthly payments." (Business, PHV)*

> *"These proposals will kill the trade. Drivers cannot afford the cost of implementing these changes. ". The public will pay more for this and under the current financial climate, it will deter the public to use taxis. Provide drivers £10000 grant and government needs to make a deal with manufacturers of vehicles to provide taxi drivers 0% interest to purchase compliant vehicles." (Business, PHV)*

Financial Hardship: Around a fifth of respondents commented on financial hardship that would result from the CAZ. Whilst the proposed funds provide some financial help, it does not cover the full cost of a compliant vehicle and the outstanding amount required to cover the rest of the vehicle would put the respondent into financial hardship:

> *"We the Hackney drivers cannot afford the new vehicle due to the fact we do not earn enough to make the relevant payments for a new vehicle. This is unsustainable." (Business, Hackney)*

> *"Because I would still need to go into more debt than I am already in and it will push me nearer to the edge that I am already teetering on." (Business, PHV)*

Other respondents commented they already have loans for their current vehicles and could not afford to pay the loan that would be associated with a new compliant taxi:

> *"I've struggled for the past 3 years to pay finance on a 25k loan, which I took out to upgrade my vehicle in the hope it would be a long time investment. Now your [sic] asking me to ditch my vehicle and take out another loan for 40k." (Business, Hackney)*

> *"I have already loan on my current vehicle. The new vehicle is well beyond my reach. I am unlikely to get through the Covid19 crisis with a damage to my credit history. There is no business and I am falling behind. With this credit history and low or no business how in heavens I am going to get a loan to buy a cab. You have to go extra mile to get this." (Business, Hackney)*

> *"I am not sure we need this massive change. We have another lockdown upon us, taxi and private hire drivers are at the edge of extinction. We definitely don't need these life changing extra expenses. My car has an outstanding finance till 2024. What will I do? will you pay my remaining finance?" (Business, PHV)*

Some commented there would be decreased residual value in their existing non-compliant vehicle, making it even harder to afford a new vehicle:

> *"I am still paying finance on my current vehicle and couldn't afford to upgrade until this is paid off. However, the fact that my vehicle is Euro5 means that it's trade in value has been heavily reduced by the CAZ plans meaning its even less likely that I will be able to upgrade to a compliant vehicle before the proposed MLS age limit. This means that I will probably be driving a non compliant vehicle for longer than I originally planned due to the CAZ - isn't this counterproductive?" (Business, Hackney)*

Impact of Covid-19: Nearly a fifth of those who commented mentioned the impact of Covid-19 on the taxi trade and increased hardship caused by the current economic climate. Some felt their future is uncertain, and the financial pressure added by the Clean Air Plan proposals would cause debt or could put them out of business:

> *"Due to Covid and the reduced business levels, the Taxi trade Is currently not viable. Any attempt to introduce this scheme at the present time will further undermine the viability of the trade." (Business, Hackney)*

> *"Unprecedented times. Current economic and health crisis has changed the way we work. The hospitality and leisure sectors have been severely impacted. Drivers incomings and outgoings have not been assessed or explored. Debt, finance issues etc. Sacha Lord Manchester's Night Time Economy adviser also states that this sector has been setback by at least 5 years, which has had a knock on effect to all other sectors. https://www.bbc.co.uk/news/uk-england-manchester-54973568" (Business, PHV)*
>
> *"Taxi trade future is not good at present due to pandemic." (Business, Hackney)*
>
> *"Not enough work to finance these vehicles and make a living." (Business, Hackney)*
>
> *"Not enough work in Manchester city centre for hackney carriages at the moment." (Business, Hackney)*
>
> *"There is no business trade now. Everyone is working from home. All the big offices, no one there. All been done online so there is no business trade, not like there used to be." (Licensed private hire driver – own my vehicle, Tameside)*
>
> *"It's just at a standstill, really, there's no work available, because of Covid, because everything's all closed and it's very, very hard to make a living now." (Depth interview: private hire driver/owner)*

Some respondents felt the fund wasn't enough, due to the pandemic, but also because of longer-term problems like the rise in the popularity of Uber:

> *"The proposed support is not enough we are coming out of a pandemic highly effected financially. If any of the PHV drivers had any savings they have gone through it so they definitely should be provided ample support." (Business, PHV)*
>
> *"We are suffering as black cab driver since UBER came we lost a lot of work now because of Covid 19 there is no work waiting time is 2 hours or above minimum for a fare the funding the idea is not the best time clean air zero emissions this the worst time taxis are facing. The funding is not enough." (Business, Hackney)*

Electric Vehicles: Other notable comments include respondents highlighting concerns associated with having an electric taxi vehicle, including the range, reliability, and access to charging for such vehicles:

> *"The LEVC taxi only covers 40 miles on a charge this is far too low to use as a taxi" (Business, Hackney)*
>
> *"An EV would not be practical for me because I don't have a charging point at my home." (Business, Hackney)*
>
> *"I wouldn't be able to charge my electric vehicle" (Business, PHV)*

6.10 Management of Funds

The consultation documents stated:

> **Clean Bus Fund:** If the fund is oversubscribed by the deadline, it is proposed that, in addition to applicants meeting the eligibility criteria, an additional process could be applied that seeks to prioritise air quality benefits, i.e. funding could initially be targeted towards the upgrade of the oldest vehicles first.
>
> **Clean Commercial Vehicle Fund:** It is proposed that financial support, subject to available funds, will be available through sequential funding rounds. These would target funding towards individuals and the smallest businesses within GM and would be initially directed towards those who are likely to be most economically vulnerable to the impacts of the GM CAZ. The proposed funding rounds are set out below:
>
> - An initial round of funding will be open to eligible owners or registered keepers of a non-compliant vehicle of Euro VI standard or older, with the exception of small businesses.
> - A second round of funding would be open to eligible owners or registered keepers of a non-compliant vehicle, with the exception of small businesses.
> - Subject to available funds, a third round of funding would be open to eligible owners or registered keepers of a non-compliant vehicle, including small businesses.
>
> **Clean Taxi Fund**: It is proposed that funding will be offered on a first come first served basis, once an applicant had evidenced that the eligibility criteria are met.

All respondents were asked to give any comments about the proposed management of the bus, commercial and taxi funds.

6.10.1 Public without affected vehicle and representatives

Most of the comments received referred to the prioritisation of the funds particularly the bus fund. Comments about the operation of the scheme were also raised.

Table 6-3 Comments on the management of funds

	Clean Bus Fund (CBF)	Clean Commercial Vehicle Fund (CCVF)	Clean Taxi Fund (CTF)
Support the fund	47	50	57
Prioritisation of fund	319	282	161
Operation of the scheme	144	141	242
Miscellaneous	60	56	28
Base	**509**	**461**	**387**

6.10.1.1 Support the management of funds

There were very few supporting comments about the management of the funds:

	Clean Bus Fund (CBF)	Clean Commercial Vehicle Fund (CCVF)	Clean Taxi Fund (CTF)
Support the proposed management of funding / eligibility criteria	47	50	57

Examples of general supportive comments about all the funds include:

> *"Sensible and vitally important to make (sustainable) bus travel the go to public transport mode for the region." (Public, aged 35-54, Private Car)*
>
> *"I think this is an appropriate way to manage the [commercial] funds and makes the most sense / will benefit the most in-need businesses." (Public, aged 18-34, No Vehicle)*
>
> *"I think the proposed management of the [taxi] funds is the correct approach." (Public, aged 35-54, Private Car)*

6.10.1.2 Prioritisation of funds

Members of the public without an affected vehicle felt the funds should be prioritised:

	Clean Bus Fund (CBF)	Clean Commercial Vehicle Fund (CCVF)	Clean Taxi Fund (CTF)
Funds should be prioritised for older vehicles / most polluting / where change will have greatest impact	245	41	67
Funds should be prioritised for sole traders / small businesses / small organisations	30	134	26
Funding should go to those who need it most/should be means tested	34	43	74
Prioritisation of funding should depend on proposal impact on business / organisation	10	24	0
Funds should be prioritised for those who upgrade to electric / hybrid vehicles	10	3	7
Funds should be prioritised for voluntary / community organisations / charities / services	11	94	0
Funds should be prioritised for those who have already recently upgraded their vehicle/s / should be reimbursed	8	5	3
Older vehicles are not necessarily the most polluting / should not focus on oldest vehicles	34	0	0
Funds should be prioritised for buses / vehicles carrying the most passengers	13	0	0
Equal amount of funding should be allocated to each district of GM	0	0	8
Base	**319**	**282**	**161**

Funds should be prioritised for older vehicles / most polluting / where change will have greatest impact (CBF n=245; CCVF n=41; CTF n=67): This was the most common response from the respondents without an impacted vehicle with regards to the management of bus funds. Responses mainly remarked on removing the most polluting and / or oldest buses from the road to improve air quality, irrespective of the size of the business:

> *"The [bus] operators should be encouraged to replace the oldest vehicles." (Public, aged 55+, Private Car)*

> *"The oldest most polluting buses should be taken off the road by late 2022." (Public, prefer not to say age, Private Car)*

> *"I think it's still best to prioritise the oldest/worst polluting [commercial] vehicles, regardless of the size of the business." (Public, aged 18-34, Private Car)*

> *"Vehicles generating the highest pollution (presumed to be the oldest) to be retired first, either via subsidies or stopping re-registration as taxis / private hire." (Public, aged 55+, Private Car)*

Funds should be prioritised for sole traders / small businesses / small organisations (CBF n=30; CCVF n=134; CTF n=26): Respondents without impacted vehicles stressed the importance of the commercial funding being prioritised for sole traders, small businesses and small organisations due to being less able to afford a compliant vehicle:

> *"I think that the self-employed and small businesses should be considered as priority for [commercial] financial support." (Public, aged 34-54, No Vehicle)*

> *"As I said before I don't think public funds should fully pay for any requirements. If they have to be used then they should subsidise funds from the businesses. Smaller, independent [bus] operators should be prioritised over larger national companies." (Public, aged 35-54, Private Car)*

Additionally, some respondents also emphasised the importance of this funding for smaller businesses due to the impact of Covid-19 and how it will help their recovery. The impact of Covid-19 on businesses is discussed in Section 7:

> *"Access to these [commercial] funds are essential for such businesses especially during a recovery period following the coronavirus pandemic." (Public, aged 55+, Private Car)*

> *"Small businesses will definitely need the [commercial] support, particularly after the economic hit of Covid-19." (Public, aged 35-54, No Vehicle)*

Funding should go to those who need it most / should be means tested (CBF n=34; CCVF n=43; CTF n=74): Some comments, especially the taxi funds, argued funding should go towards those who need the greatest amount of financial support with some representatives also emphasising it might not necessarily be reflected in the size of the business:

> *"The distribution of [taxi] funds should take account of impact, not just first come first served." (Public, aged 55+, Private Car)*

> *"Financial support should be available to those who need it most and would not be able to continue without it." (Public, aged 35-54, Private Car)*

> *"Those who are providing the most needed services should be first on the list. IE bus services on less popular routes that are essential for the elderly." (Public, aged 35-54, Private Car)*

> *"Finance should be focussed on a stronger economic model than smallest business first, it should be weighted on financial impact and social impact." (Organisation, The Old Courts Wigan)*

"Not necessarily just because they are small doesn't mean they have less money it should be done based on lowest turnover." (Councillor / Elected Official)

Funds should be prioritised for voluntary / community organisations / charities / services (CBF n=11; CCVF n=94): Respondents made reference to their importance in the community as well as potentially not having the 'capacity to complete complex funding arrangements':

"[Commercial] financial support should be available to charitable or voluntary organisations first and then small businesses." (Public, aged 35-54, Private Car)

"Prioritise [commercial funding for] businesses and organisations that make a positive contribution to their community, especially charities and voluntary groups." (Public, aged 55+, Private Car)

"Financial support should be available primarily to VCSE and small independent businesses. It should be made very easy for them to apply. Small businesses and charities do not have capacity to complete complex funding arrangements." (Organisation, Farnworth Baptist Church)

6.10.1.3 Operation of the scheme

Comments about how the funds would be managed included:

Mismanagement and transparency of the funding (CBF n=81; CCVF n=70; CTF n=78): Several responses expressed their apprehensions surrounding how all the funds will be managed and called for full transparency. In terms of transparency, respondents stated the decisions of how and where the funding is being distributed should be 'open to public view and scrutiny' as well as being audited. Furthermore, several respondents voiced their disapproval of local governing bodies and did not believe the funding would be effectively managed by them:

"This has to be managed carefully, because certain [bus] operators like stagecoach and first have a lot of vehicles so it would make sense for enough funding to be available to go around every operator no matter how big or small. It's often the smaller operators that have older vehicles because of the replacement costs so they should not be forgotten." (Public, aged 18-34, Private Car)

"Again, I don't trust the proposed management of [commercial] funds with schemes like this because they tend to have a habit of money being wasted or money disappearing and it's usually by the people who are so heavily involved with the scheme." (Public, aged 35-54, Private Car)

"It (Commercial fund) should be closely monitored with full audit trail and absolute transparency." (Public, aged 55+, Private Car)

"Be transparent about who gets [Taxi] funding. Every last penny. Account for it. Publicly." (Public, aged 45-54, Private Car)

"Management expenses and costs should be open to public view and scrutiny." (Organisation, Anonymous)

Fraud / Abuse of the scheme (CBF n=56; CCVF n=43; CTF n=97): There were concerns from respondents about the scheme (especially the Clean Taxi Fund) being misused, with comments stating it could be used to increase businesses incomes, as well as fraud by fake applications and businesses:

"Be aware of the potential for fraud [bus fund]. Will vehicles benefitting from it remain in the GM area? Could retrofitted buses be moved out of the area and older vehicles moved in, so that they could claim more retrofitting? etc." (Public, aged 35-54, No Vehicle)

"I worry about abuses to the [commercial fund] system. Businesses are adept at maximising their income by fair means and some by foul." (Public, aged 55+, Private Car)

"I expect a close definition of businesses able to claim on any such [commercial] fund with strict anti-fraud measures and harsh punishments for anyone convicted of fraud." (Public, aged 55+, Private Car)

"Funds are by there [sic] nature, subject to fraud. By the time you have finished, everyone in Greater Manchester will own a taxi." (Public, aged 55+, Private Car)

Concerns about larger companies accounting for / receiving the majority of the funds available (CBF n=24; CCVF n=37; CTF n=18): Some comments were concerned about larger companies being able to apply and also receive bus and commercial funding:

"I think it's important to ensure large companies aren't receiving an excessive amount of the [bus] funding, e.g. [name of company]. Perhaps also allotting funding based on company size might also be beneficial." (Public, aged 18-34, No Vehicle)

"Big companies should not qualify for a [commercial] fund, the fund should be dedicated to the small, independent businesses." (Public, aged 35-54, Private Car)

"Whilst first come first served might seem fair, in reality, larger businesses are more likely to be better organised and have other staff to make these applications. Whereas smaller one-man band types would easily miss these [Taxi fund] schemes, and then by the time these types of businesses realise, the funding could be all gone. Smaller businesses will more likely struggle to make these charges, and should be helped before larger firms with better profit ratio." (Public, aged 55+, No Vehicle)

Fund needs to be well advertised (CBF n=3; CCVF n=6; CTF n=23): Some members of the public commented the taxi fund in particular needs to be well-advertised to ensure those affected are aware of the opportunity to apply for funding:

"If it is to be on a first-come-first-served basis, there needs to be a very robust communication strategy in place to ensure that access to [Taxi] funds is fair and equitable. Affected drivers need to be communicated with about the CAZ, arguing the need for it and telling them of their rights. The communications strategy needs to be multi layered and diverse to reach drivers of affected vehicles especially small businesses, sole traders entitled to exemptions and financial help. It needs to reach into all the diverse communities across Greater Manchester in different languages. A digital by default strategy won't reach all the target audience. GMCA needs to prepare the ground by reaching into communities to find out what works. One of the messages re the need for the scheme should be the impact of NO_2 on drivers. Being in vehicle doesn't protect you, also the impact of NO_2 on your family, friends and neighbours." (Public, aged 55+, Private Car)

6.10.2 Management of the Bus Fund – Bus operators

Respondents were asked if they had any comments on the management of the Clean Bus Fund. In total, only 10 business respondents with buses provided a comment.

Funds should be prioritised for older vehicles / most polluting / where change will have greatest impact (n=4): Respondents felt funding should be prioritised for these vehicles in order to improve air quality most effectively, with these comments being shared particularly by those who had concerns about the amount of funding not being enough:

"Older vehicles should be modernised first." (Public, Bus, Coach)

Concerns about larger companies accounting for / receiving the majority of the funds available (n=3): Concerns were raised about large operators receiving the fund saying it should go to those who needed it the most:

"Funds should go to the operators who need the help most. either the oldest vehicles or the operators most at risk to suffer financial difficulties due to this." (Business, Bus, Coach, LGV)

6.10.3 Management of the Clean Commercial Vehicle Fund – Van owners

Respondents were asked if they had any comments on the management of the Clean Commercial Vehicle Fund. In total, 90 business respondents with vans provided a comment. The most commonly received comments from this group were:

Funds should be prioritised for sole traders / small businesses / small organisations (n=36): This was the most common response from business respondents who own a van, who stressed the importance of funding being prioritised for sole traders, small businesses and small organisations due to being less able to afford a compliant vehicle:

"Yes as a small business I would definitely want smaller firms that are likely struggling the most yet expected to buy a new van or other vehicle…helped out first." (Business, LGV)

"Small businesses, sole traders and partnerships with an income under a threshold should be eligible, with greater priority to those who also rely on tax credits to supplement their income." (Business, LGV)

"I would agree with smaller business / sole traders being first as they have less profit & turnover and are less likely to afford a new vehicle as big businesses." (Business, LGV)

Concerns about larger companies accounting for / receiving the majority of the funds available (n=10): Some comments made by van owners were concerned about larger companies being able to apply for and also receive funding:

"Needs to help those that most need it. Not huge companies who can afford it. Should be done off your tax return with low earners given priority." (Business, LGV)

"Totally agree. We should help those most at risk of losing their livelihoods before those who are big enough to write off the upgrades against profit." (Business, LGV)

Funds should be prioritised for older vehicles / most polluting / where change will have greatest impact (n=9): Responses from van owners mainly remarked on removing the most polluting and / or oldest vehicles from the road to improve air quality, irrespective of the size of the business:

"If the aim is really to reduce pollution shouldn't it be aimed at the most polluting businesses first and the smaller, less polluting businesses remain exempt." (Business, LGV)

"Financial support should be available for the replacement of oldest vehicles first. Size of operator should not matter." (Business, LGV, HGV)

Concerns about the funding being mismanaged / needs to be a transparent process (n=7): Several responses expressed their apprehension surrounding how the fund will be managed and called for full transparency. A number of respondents also voiced their disapproval of local governing bodies and did not believe the funding would be effectively managed by them:

"I have every confidence that they will be adequately mismanaged." (Business, LGV, Other vehicle)

"Will probably be mismanaged like everything else GMC does." (Business, LGV)

Support the proposed management of funding / eligibility criteria (n=7): Some comments from van owners were in support of the funding. Respondents mainly used words including 'agree', 'good' and the support was needed:

"That would be a great help." (Business, LGV, HGV)

6.10.4 Management of the Clean Commercial Vehicle Fund – HGV owners

In total, 30 business respondents with HGVs provided a comment. The most commonly received comments from this group were:

Funds should be prioritised for sole traders / small businesses / small organisations (n=10): This was the most common response from respondents who own an HGV, who stressed the importance of funding being prioritised for sole traders, small businesses and small organisations due to being less able to afford a compliant vehicle:

"It is going to be essential for the smaller businesses to get help or a lot of them won't survive." (Business, HGV, LGV)

"I'd say that 90+% of the large operators of HGVs in and around Manchester have already upgraded their fleet (due to normal financial fleet practices). Companies like mine need to be prioritised by any financial schemes available." (Business, HGV, LGV)

Support the proposed management of funding / eligibility criteria (n=5): Some comments from HGV owners were in support of the funding. Respondents mainly used words including 'agree', 'good' and the support was needed.

6.10.5 Management of the Clean Commercial Vehicle Fund – Coach / minibus

Respondents were asked if they had any comments on the management of the Clean Commercial Vehicle Fund. Only nine business respondents with coaches or minibuses provided a comment. The most commonly received comments from this group were:

Funds should be prioritised for sole traders / small businesses / small organisations (n=6): Respondents stressed the importance of funding being prioritised for sole traders, small businesses and small organisations due to being less able to afford a compliant vehicle:

"Smallest first to avoid the huge companies getting money first." (Business, Minibus, PHV)

Concerns were raised the bus fund is not available for operators who operate within GM but are based elsewhere.

"We note that the Councils have applied to Government for a significant sum to help locally-based businesses and organisations with non-compliant vehicles address the financial costs of compliance. These proposals, set out in the consultation document, are comprehensive and detailed. However they unreasonably and unjustifiably discriminate against businesses operating into Greater Manchester from beyond the boundaries of Greater Manchester, and scheduled express coach operators in particular, who are neither eligible for a time-limited local exemption, or any financial support to comply." (Business, Coach)

6.11 Management of the Clean Commercial Vehicle Fund – Leisure Vehicles

Respondents were asked if they had any comments on the management of the Clean Commercial Vehicle Fund. In total, 90 respondents with leisure vehicles provided a comment. The most commonly received comments from this group were concerns for small businesses and sole traders:

Funds should be prioritised for sole traders / small businesses / small organisations (n=29) **and funding should go to those who need it most / should be means tested** (n=8): Respondents stressed the importance of funding being prioritised for sole traders, small businesses and small organisations due to being less able to afford a compliant vehicle. Some comments argued funding should go to those which need the greatest amount of financial support:

> *"Small businesses should get help first as they're likely to struggle with the increase of price." (Public, aged 18-34, Leisure HGV, HGV, PHV, Private Car,)*

> *"Smaller businesses tend to have less capital available for vehicle replacement and should have financial support." (Public, aged 55+, Leisure HGV, Private Car)*

> *"You should support the ones you are risking closure too. I hope there is enough in the unemployment pot." (Public, aged 35-54, Leisure HGV)*

> *"Agree that businesses with the greatest need should be prioritised." (Public, aged 18-34, Leisure HGV)*

Support the proposed management of funding / eligibility criteria (n=7): Only a few respondents who own a leisure LGV or HGV supported the management of the clean commercial fund. Respondents used words including 'agree', 'good' and specifically highlighted the importance of helping the 'most in need businesses':

> *"Agree that businesses with the greatest need should be prioritised." (Public, aged 18-34, Leisure LGV)*

Concerns about the funding being mismanaged / needs to be a transparent process (n=7): Several responses expressed their apprehension surrounding how the commercial fund will be managed and called for full transparency:

> *"Should be transparent so all can see how much and where the money is being spent." (Public, aged 55+, Leisure HGV)*

6.12 Management of the Clean Taxi Fund – Hackney, PHV

Respondents were asked if they had any comments on the management of the Clean Taxi Fund. In total, 88 hackney and PHV drivers provided a comment. The most commonly received comments from these groups were:

Oppose proposed first-come-first-serve approach / is unfair (Hackney n=21; PHV n=14): Drivers opposed this approach or felt it was unfair. Some thought first-come-first-served could risk disproportionately benefiting those who are already engaged with the system, whilst those on the periphery are missed:

> *"Stupid idea. The people who will come first will be the ones who have some savings (who have multiple cabs and rent them out) and they try and save more with the government fund. Those who are struggling to pay their bills will leave it as late as possible to save as much money as they can but by then the fund would've finished. There are garages who own 30 or 40 plates and Hackney Carriage vehicles and so they will use up all the fund." (Business, Hackney)*

Support the proposed management of funding / eligibility criteria (Hackney n=2; PHV n=8): More PHV respondents commented on supporting the funds than hackney respondents.

> *"First-come-first-served sounds good." (Business, PHV)*

However, some commented whilst first-come-first-served was a fair method of distribution, it was important there was enough funding for latecomers:

> *"We agree with the first-come-first served basis, but it should be guaranteed that they are not going to turn around to the latter people and say they have run out of money. Also there should not be a heavy admin burden on drivers, keep red tape to a minimum." (Business, PHV)*

Funds should be prioritised for older vehicles (Hackney n=6; PHV n=3): Some thought funds should be prioritised for older, more polluting vehicles or where change would have the greatest impact:

> *"It would make sense to give the drivers of older, dirtier vehicles first option. Why not introduce a longer exemption period for Euro 5 vehicles meaning the dirtiest vehicles get replaced first?" (Business, Hackney)*

> *"I believe the older vehicles should be helped first before the likes of Euro 5 engine vehicles are helped." (Business, Hackney)*

Funding should go to those who need it most / should be means tested (Hackney n=3; PHV n=4): Some commented funding should go to those who need it most or it should be means tested:

> *"Yes. Abuse or misuse of the application process and or funds by certain individuals or organisations. First-come-first-served is not always necessarily the fairest option. May need to be assessed on a case by case basis and on merit subject to eligibility and possibly a further review if needed." (Business, PHV)*

6.13 Try Before You Buy

Respondents were provided with a summary of the proposed Try Before You Buy initiative:

To tackle the barriers to switching to electric vehicles, GM is proposing a "Try Before You Buy" initiative for GM-licensed hackney drivers. The opportunity to hire and assess the vehicle before making an investment should help to address identified uncertainties about operating costs, range anxiety and availability of charging infrastructure.

They were then asked if they had any comments on the proposed initiative. The key themes emerged from the comments are summarised in Table 6-4 Comments on Try Before You Buy**.** Very few comments were received from the public. A quarter of representative and a fifth of businesses commented.

Table 6-4 Comments on Try Before You Buy

	General Public	Business	Representatives
Support the scheme	182	56	19
Oppose the scheme	96	35	7
Operation of the scheme	7	3	0
Concerns	17	4	2
Miscellaneous	192	84	10
Base	**449**	**161**	**31**
Proportion of all respondents (%)	12	21	25

6.13.1 Support the scheme

Just over a third of businesses and members of the public gave a supportive comment and three quarters of representatives who commented were supportive of the scheme.

	General public	Business (excl. Taxis)	Represent-atives	Hackney	PHV
Support the try before you buy scheme	180	19	19	17	15
Try before you buy should be available for other vehicles	3	5	0	0	2
Base	**182**	**24**	**19**	**17**	**15**

Of the comments received, two fifths of respondents left comments in support of the Try Before You Buy scheme or suggested the scheme would help drivers get a better idea of vehicles and capabilities (public n=180; business n=19; representative n=19). Some thought the scheme could help to overcome anxieties surrounding electric vehicle technology and encourage more drivers to convert to electric:

> *"As a proven sales technique in many sectors, I believe this would help significantly accelerate low emission vehicle uptake. It is widely reported that range anxiety is one of the biggest contributors to a lack of low emission vehicle adoption. Investment in*

EV infrastructure would provide more consumer confidence." (Public, aged 35-54, Private Car)

"It makes sense because there is a lot of undue concern about the suitability of hybrid or electric vehicles and trying them will alleviate the concerns." (Public, aged 35-54, Private Car)

17 Hackney drivers expressed interest in the scheme.

"I would be interested in the try before you buy scheme." (Business, Hackney)

"I have already bought an EV and hence this policy wasn't available to me. But the initiative is a good one for future buyers" (Business, Hackney)

"Yes will try the different vehicles that are available" (Business, Hackney)

Representatives voiced support for the scheme given it is provided alongside sufficient financial support to enable upgrade to electric vehicles.

"Members feel that this is a good idea if it sits within a comprehensive package of measures. There's no point in it if the electric option is financially non-viable, as it is currently is under the suggested proposals." (Organisation, Unite the Union)

Although the Try Before You Buy scheme is only intended for hackney drivers, other sectors thought it would be useful if an equivalent scheme was established for other vehicle types. Of those who commented, five businesses and two PHV respondents suggested the Try Before you Buy scheme should be extended to other vehicle types, including PHVs and LGVs:

"Great idea. an equivalent for vans would be even better, as there are many more of these impacted." (Public, aged 35-54, Private Car)

"It is always a good thing to try before you buy. PHV drivers should given the opportunity to try before you buy." (Business, PHV)

6.13.2 Oppose the scheme

A few did not agree with the scheme:

	General public	Business (excl. Taxis)	Represent-atives	Hackney	PHV
Oppose the try before you buy scheme	81	20	6	8	7
Scheme is not needed should upgrade to electric vehicles	16	0	1	0	0
Base	**96**	**20**	**7**	**8**	**7**

Some respondents had reservations about the scheme and made comments in opposition (public n=81; business – excluding taxis n=19; representatives n=6, hackney n=8; PHVs n=7) feeling the package was not enough to incentivise uptake:

"Try before you buy. Why would I rent a vehicle when I already own a perfectly serviceable vehicle? If you wish to encourage drivers to buy into it then the package needs to be far more lucrative." (Business, Hackney)

"I can't see many drivers opting into that. No sense. We have enough going on without taking a scheme like that on." (Depth Interview: Hackney driver).

Others felt the scheme was unnecessary or a waste of money, as hackney drivers would have to upgrade anyway:

"Seems pointless. Everyone will have to upgrade, and the move to electric will happen anyway. Businesses will just be wanting to avoid the costs of not complying. Put the money in to the finance package to make it more generous." (Public, aged 35-54, No Vehicle)

"I think that businesses ought to be self-sufficient and knowledgeable enough not to need such an initiative" (Public, aged 18-34, Private Car)

6.13.3 Concerns about the scheme

The following concerns were raised by a few respondents:

	General public	Business (excl. Taxis)	Represent-atives	Hackney	PHV
Concerns about where funding is coming from	9	1	1	2	0
Concern about people abusing it	10	1	1	0	0
Base	**17**	**2**	**2**	**2**	**0**

Some respondents left comments which suggested concern about where the funding to support the Try Before You Buy scheme would come from (public n=9; Hackney n=2):

"And how much will that cost? Why not just only allow electric taxis to be used entirely - by buying a fleet and maintaining it. You seem to want to spend billions. MADNESS." (Public aged 35-54, Private Car)

"Cost effectiveness should be demonstrated before wasting tax payers money" (Business, Hackney)

There was also concern from some members of the public the scheme would be open to abuse (n=10):

"'Opportunity to hire and assess the vehicle's sounds vague. It must be for a short, defined period otherwise people will learn to manipulate the scheme." (Public, aged 18-34, Private Car)

6.13.4 Queries about the scheme

	General public	Business (excl. Taxis)	Represent-atives	Hackney	PHV
Queries about the proposals / information not clear	144	30	2	10	4

Several respondents were unclear on the detail of the scheme and made comments querying how the scheme would work, eligibility and costs of the scheme (public, n=144; business excluding taxis, n=30; and hackney, n=10, PHV, n=4):

"Further information is needed on this regarding the eligibility and how this will work." (Business, Hackney)

6.13.5 Other – Electric Vehicle Performance

Several comments were received about electric vehicles and the available infrastructure:

	General public	Business (excl. Taxis)	Represent-atives	Hackney	PHV
Concerns about the lack of electric charging infrastructure	11	1	0	1	0
Electric vehicles are too expensive / unaffordable to upgrade	8	4	4	17	6
Concerns about performance of electric hackneys	3	1	1	0	1
Concerns about availability of electric vehicles	4	1	0	1	1
Base	**24**	**7**	**5**	**18**	**8**

Some respondents voiced concerns about the performance of electric hackneys (public n=3; business excluding taxi n=1) and availability of electric vehicle charging points (public, n=11; hackney, n=1). Some felt without sufficient electric charging infrastructure in place, the scheme would not help to alleviate fears around electric vehicle technology:

> *"Its sounds good but I don't think it will work in the real world as batteries degrade overtime and will cause issues with recycling" (Business, PHV)*

> *"Great idea but the infrastructure needs to be in place ASAP. What are you doing about the thousands of people that live on terraced streets, how are me going to charge vehicles?" (Public, aged 35-54, Private Car)*

> *"I expect that range anxiety would be a real concern, however the success of this scheme will be dependent on the availability of charging infrastructure. How will charging work? I anticipate that taxi drivers will need to charge during working hours, however will there be a charger available in a convenient location? Will there be enough so that there will always be one available when they attend to charge up? This won't work if there is a queue of taxis waiting for few chargers, it would take out too much of their working day waiting hours to charge." (Public, aged 35-54, Private Car)*

> *"I mean I'd more than look at hybrids to start off. I wouldn't go all electric, because the facilities to charge for a taxi, whether you like it or not you do twelve hour shifts and then it jumps to someone else to do another twelve hour shift, so the car's doing a twenty four hour shift every day, but it needs to be maintained, looked after and charged and at the moment there's no places to charge, not enough places to charge them." (Depth Interview: Hackney driver)*

> *"I know a two-year-old electric car, it needs batteries already and it's costing him £1200 and he wished he's never bought it now." (Depth Interview: Hackney driver)*

> *"Actually there are particular issues for electric vehicles for disabled people, because they don't have any noise and therefore if you don't understand that there might be deaf and hard of hearing people, children and people with learning difficulties or dementia that might not actually see the electric, you know, be aware of the electric vehicle, you need to have a much more stringent driving standards." (Focus Group: Disabled Hackney/PHV user)*

Some also raised concerns with the cost of electric and felt upgrading is unaffordable to many hackney drivers (public n=8; business n=27; representatives n=4). This view was held by a third of the hackney respondents:

“No ..... it’s not that I don’t think it’s good for the environment although an electric car will not be something very nice to drive my objection to purchasing one is I would not be able to afford the repayment and to keep it on the road” (Business, Hackney)

“Vehicles are heavily overpriced. Any funds would increase the prices further.” (Business, Hackney)

“It’s not the trying the vehicle it’s the amount it is to buy one” (Business, Hackney)

“To buy an electric vehicle you’re looking at 56,000. Now, if you want to put that in perspective I own 19,000 on my mortgage, that 19,000 will have me working, I am working now by twenty hours, so where’s the decision, where do you make the decision on that? Do you saddle yourself up with 50,000? The Government, even if they offer, I think they’re thinking at the moment it’s 10 grand, they’re looking at offering 10 grand, you’re still looking at £46,000, do you know what I mean?” (Depth Interview: Hackney driver)

"A brand-new electric cab, the bottom end is £55,000. So even if they gave you £17,500 towards one of those vehicles, you’re saddling somebody with a debt of almost £30,000." (Depth Interview: Hackney driver)

6.14 Vehicle finance offer

The vehicle finance offer was introduced to all respondents in the questionnaire as follows:

A Greater Manchester appointed panel of finance providers will work alongside the Clean Commercial Vehicle Fund and Clean Taxi Fund to offer eligible owners of a non-compliant vehicle the option of either a lump sum grant or a finance contribution towards vehicle finance to help them upgrade to a compliant vehicle.

Over a third of businesses commented on the vehicle finance offer, as did a third of representatives and a fifth of the public. There was a polarised view of the proposed finance offer; a third of comments were supportive stating it was vital to helping businesses upgrade to compliant vehicles. However, a third of comments were negative raising concerns it could lead to increased debt for those receiving loans, putting increased pressure on businesses.

Table 6-5 Comments about the Vehicle Finance Offer

	General Public	Business	Representatives
Support the fund	288	98	16
Oppose the fund	283	157	13
Operation of the scheme	225	24	9
Queries	83	76	5
Need more funding	9	12	3
Miscellaneous	37	15	4
Base	**849**	**325**	**41**
Proportion of all respondents (%)	22	42	33

6.14.1 Support the fund

Comments in support of the fund included:

	General Public	Business	Represent-atives	Own impacted vehicle	No impacted vehicle
Support the proposed funding / vehicle finance offer	262	89	11	102	258
Funding / support should be available to all those affected / fair to all	29	10	5	21	22
Total	**288**	**98**	**16**	**122**	**277**

Members of the public (n=262), businesses (n=89) especially those with vans (n=37) and taxis (n=39) and organisational representatives (n=11) who supported the finance offer felt removing the worst emitters and replacing them with zero or low-emission vehicles was priority, and it would only be fair to support those who are not able to afford the upgrade:

"This is a good idea due to the price points associated with supposed clean air cars. There are still a high number of high emission vehicles on the roads because of the costs being so high for a low emission or zero emission car." (Public, aged 18-34, Private Car)

"This would massively help businesses like mine, who would struggle to replace an entire fleet" (Business, HGV)

"This sounds like a great offer. Makes an electric vehicle very realistic for our very small business" (Business, LGV)

"With Corona virus I am sure many taxis are struggling to survive. I think financial help would be a big bonus to keep them in business." (Public, aged 55+, No Vehicle)

Business respondents stated financial aid is required, as they would be unable to afford a new vehicle without aid. A few pointed to the current economic situation as putting additional strain on their business:

"It would have to be generous as so many businesses are barely surviving in the current climate, any additional cost could be the end of their viability to continue operating." (Business, LGV)

"This would massively help businesses like mine, who would struggle to replace an entire fleet" (Business, HGV)

An elected official suggested that Greater Manchester Local Authorities could support through collective buying power:

"Thought should be given to bringing together the buying power of all public bodies in Greater Manchester for a single fleet renewal strategy. There could be an advantage to securing more favourable lease or purchase contracts. This could be extended to allow Private Hire Drivers to benefit from any discounts realised through such a scheme, recognising their role as an essential part of our public transport system" (Councillor / Elected Official)

6.14.2 Oppose the fund

The main reasons for opposing the funds included:

	General Public	Business	Represent-atives	Own impacted vehicle	No impacted vehicle
Oppose the vehicle finance offer / Concern not providing value for money	131	53	4	69	118
Vehicle finance offer will lead to more debt	40	63	1	70	34
Support should be given as a lump sum grant not a loan	46	32	4	41	41
Finance / loans provided should be affordable / low / zero interest	34	29	4	29	38
Support should not be available / not needed	48	1	0	7	42
Base	**283**	**157**	**13**	**196**	**256**

Several respondents from the public (n=131), businesses (n=53), and representatives (n=4) raised concerns about the vehicle financing offer:

Concern about more debt: Businesses (n=63), especially those with vans (n=16) and taxis (n=44) were unwilling to take on financial arrangements, which would put them into debt. Respondents felt the implementation of the CAP will have a negative impact on their current vehicle's value, increasing the amount of finance they would need to buy a compliant vehicle.

> *"Many sole traders would be forced to use the vehicle finance offer as they do not have the funds to cover this massive cost, especially in current times - this finance would push many people in GM into debt which could lead to financial trouble." (Business, LGV)*

> *"It's not financially viable to go into debt to continue to operate in the current climate with Covid-19 and the UK recession." (Business, Hackney)*

The introduction of lump sum grants: It was argued by businesses (n=32) they would rather have a grant than a loan in order to minimise the financial impact of upgrading vehicles. Linked to the point above respondents were concerned about the financial pressure a loan would bring:

> *"Finance only works in cases where credit ratings and scores are good enough. Many small businesses have been through hardship and hence lack the score required" (Business, LGV)*

However, others argued the offer of lump sum grants could lead to mismanagement of public finance. Members of the public (n=46) and representatives (n=4) contended the offer of lump sum grants could lead to misuse or fraudulent activity, as well as leading to the subsidisation of businesses that aren't economically viable, and therefore argued for a loan option, or for no finance to be offered:

> *"No lump sum should be given should be finance offer as some will take money and fold the company" (Public, aged 55+, HGV, Private Car)*

A vehicle financing option with zero interest loans: Some emphasised any loans would need to be zero or very low interest rates to make them a viable option for most, particularly taxi drivers (n=22).

Funding should not be available: Several members of the public (n=48) felt it was unnecessary to provide additional funding to road transport, either because the money should be spent elsewhere on other transport projects, such as on public transport and active travel modes, or in other areas of public sector spending:

> *"Ridiculous - this money should be spent on public transport" (Public, aged 35-54, Private Car)*

> *"We cannot afford this money - needs to be spent on social care, education and the NHS" (Public, No age provided, Private Car)*

6.14.3 Operation of the scheme

A wide variety of comments were received about the operation of the scheme including:

	General Public	Business	Represent -atives	Own impacted vehicle	No impacted vehicle
Concerns about the funding / support being mis-managed	71	6	1	7	71
Concerns / queries about where funding is coming	55	10	1	13	53
Concerns people claiming when not needed / abuse of the scheme	57	4	2	8	55
Funding should go to those who need it most / should be means tested	18	2	3	3	20
Support should be prioritised to upgrade to hybrid / electric vehicles	12	1	0	0	13
Support should only be paid after vehicles have been invested in	6	2	0	0	8
Needs to be well-advertised	5	1	0	3	3
Support prioritised for older vehicles/most polluting	5	0	0	1	4
Support should be prioritised for voluntary / community / charities	3	0	1	2	2
Concerns may not be able to apply immediately / miss the opportunity	1	0	1	1	1
Base	**225**	**24**	**9**	**38**	**220**

Misallocation of funds. Several members of the public (n=71) were concerned the allocation of funding would be mismanaged by GMCA / TfGM / CAP scheme, with a few arguing the process should be operated entirely independently of the political system within GM and prioritising the environmental impact of investment rather than political or business:

> *"Panel should be environmentally biased not business biased, and politically neutral." (Public, aged 35-54, Private Car)*

Of particular concern to some respondents was the possibility of private companies being involved as part of the vehicle financing support and using this as an opportunity to profit from interest payments, leading to further financial difficulty for operators. Respondents with these concerns felt the fund should be managed by TfGM or GMCA and provide a competitive rate if a vehicle financing offer is utilised.

Concerns about fraudulent claims of finance. Respondents from the public (n=57) and representatives (n=2) were wary of abusive claims of the vehicle financing offer, indicating it was vitally important to implement means testing to ensure those who need the aid most received it, and to remove the possibility of fraudulent claims. Of concern was the prospect of larger firms having access to funding when it would not be required:

"Lump sum grants should be ring-fenced; and / or payment made directly to vehicle dealers so as to prevent diversion of funds and fraud." (Public, aged 35-54, Private Car)

"This should only be awarded to small, individual operators or those providing a necessary social service. Large, commercial companies can pay out of their profits." (Public, aged 55+, No Vehicle)

Concern about the level of financial support available: There was some worry from participants of all groups there would be an insufficient level of funding from Local Government to provide the necessary aid to those who needed it, and more options should be provided by Central Government in the form of low-emission / zero-emission grants to encourage more operators to invest in cleaner vehicles:

"This should be a Central Government scheme of discounts that are more generous than the £3K electric car grant that exists currently." (Public, aged 55+, Private Car)

Compensation for already purchased vehicles: Some businesses (n=7) outlined they had already purchased compliant vehicles, and therefore enquired whether there would be compensation:

"What about the drivers who have already bought the vehicles they should be entitled to the grant as well it has to be fair for everyone?" (Public, aged 55+, No Vehicle)

Supportive of funding for electric and hybrid vehicles: Several contributors from all groups mentioned funding should only be provided for upgrades to electric or hybrid vehicles, however, they did highlight that currently charging infrastructure is inadequate for the widespread usage of electric vehicles.

6.14.4 Queries about the finance offer

Several queries were made:

	General Public	Business	Represent -atives	Own impacted vehicle	No impacted vehicle
Queries about the proposals - general comments	30	37	1	47	21
Queries about the proposals - vehicle finance offer / funding amount	33	22	2	30	27
Queries about the proposals - eligibility for the vehicle finance offer	17	22	3	26	15
Would like there to be more consultation with those affected	4	2	0	3	3
Base	**83**	**76**	**5**	**97**	**66**

Uncertainty about eligibility for vehicle financing. A couple of respondents from different groups gave comments, which showed they were uncertain about their eligibility for vehicle financing:

"the eligibility is vague - grants some payable some not so, but obtaining a compliant vehicle is going to hit the small business hard when they have been affected by a downturn in business during CV19" (Public, 55+ Private Car)

Queries about the level of funding: There were a number of queries about the level of funding being made available to fund the upgrade of vehicles, with many doubting whether there would be sufficient funding to provide for the number of public and businesses requiring

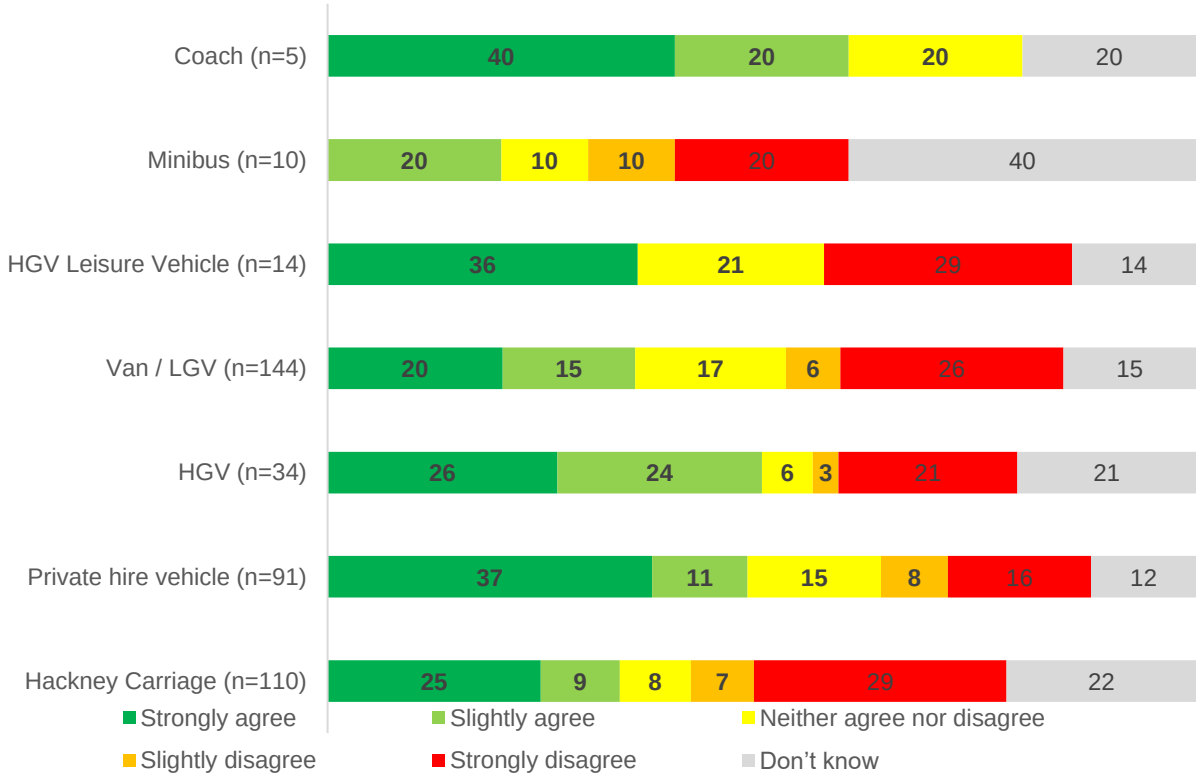
aid in GM (public, n=33; business, n=22; representatives, n=3). Participants, particularly taxis (n=11) were concerned the introduction of the CAP would skew vehicle prices within GM, making new vehicles unobtainable:

> *"It would need to be enough to support my business and for dealerships to not put prices up before the funding comes in. As I would expect dealerships once they know the funding to add money on to van prices" (Business, LGV)*

6.14.5 Will the vehicle finance meet their needs?

In total, 37% of those who owned any of the potentially affected vehicles agreed the vehicle finance offer would meet their needs with 28% disagreeing. **Figure 6.3**. shows the level of agreement by vehicle type.

Figure 6.3 Agreement the proposed vehicle finance offer would meet their needs by vehicles owned (%)



Base: All eligible for the Clean Commercial Vehicle or Clean Taxi fund
Caution should be used where base is small (n<50)

37% of those who have been financially impacted by Covid-19, whether a business, taxi or organisation, agree the vehicle finance offer would help while 30% disagreed, of which 25% strongly disagree.

25% of those who have at least one impacted vehicle agree the vehicle finance offer will meet their needs and 29% disagree it will meet their needs.

The main reasons respondents agreed or disagreed the proposed finance offer would meet their needs is described below.

6.14.5.1 Agree the fund meets their needs

Support the proposed vehicle finance offer: Some taxi drivers (n=4) and commercial operators (n=2) stated they supported the proposed funding, allowing them to upgrade to

newer, compliant vehicles. For most, it was necessary to have financial support to be able to do this:

> *"For a company like ours that has no debt it would be the difference between survival or closure" (Business, Leisure HGV)*

> *"It can help taxi drivers for low finance" (Business, PHV)*

> *"Financial assistance to upgrade vehicles may allow us to carry on with our business" (Business, LGV, 10219)*

> *"I would need financial support to upgrade my vehicle." (Business, LGV)*

> *"Will be massive support to upgrade for newer vehicle" (Business, PHV)*

6.14.5.2 Disagree the fund meets their needs

Oppose the proposed vehicle finance offer, financing should be given as a lump sum grant: Some taxi drivers (n=8) and commercial operators (n=12) stated they opposed the proposed funding for a number of reasons. It was argued it would be insufficient finance to upgrade, and a grant option was preferred:

> *"I would wish to negotiate a purchase in the knowledge that a lump sum was available. Not a fan of 'you must buy from XYZ. I assume any compliant vehicle could be bought and need not be new. Smaller ' one-man bands ' such as I need to ensure VFM in van purchases." (Business, LGV)*

> *"Money needs to be provided to people who cannot afford to upgrade their vehicles and needs to be granted not financed. After the year we have just had and with no end in sight there is no money left to buy new vehicles" (Business, LGV)*

Vehicle financing offer will lead to more debt: The majority of taxi drivers (n=20) and some commercial operators (n=12) felt the vehicle financing offer would only lead to more debt, risking their or their businesses' financial state. A number of respondents referred to the current economic climate, which has put increased financial pressure on them:

> *"I am already in debt because of this last year and I can't see business getting any better in next twelve months, plus it doesn't help when there are private hire vehicles from the Midlands and Liverpool working all over Greater Manchester" (Business, PHV)*

> *"As need funds to upgrade for better car as with all this virus atm. I couldn't afford to keep my old car and it's getting hard with times like this to buy another car for taxis. As on top of the car got other expenses like taxi insurance and buy the time u get your taxi on road your need funds to do so" (Business, PHV)*

Uncertainty about funding amount: Commercial operators (n=4) and taxi drivers (n=2) were uncertain about the level of funding that would be available, and whether this would sufficiently aid them to upgrade their vehicles. Furthermore, some were concerned their low incomes and poor credit scores would affect their ability to receive finance:

> *"Due to Covid-19 no extra funding is available, and loans are not forthcoming as not eligible due to low income through less work being undertaken" (Public, aged 55+, LGV, Private Car)*

> *"Because at nearly 60 years of age & in rented accommodation I have a bad credit record" (Business, Hackney)*

> *"unsure of how much the funding would be and whether I would be able to afford to upgrade my vehicle" (Business, LGV)*

> *"I don't know how much I would receive so I don't know how much it would help. Where are the figures?" (Business, LGV)*

Uncertainty around funding eligibility: There was some uncertainty about how much support would be provided to commercial operators (n=3) and taxi drivers (n=4), depending on the size of their business:

> *"We potentially have 14 vans and 1 minibus requiring an upgrade and 2 HGVs, although these could be under permanent local exemptions if road sweepers are considered specialist HGV. 3 vehicles are leased so specification could be upgraded at end of lease to ensure compliant vehicles in future, the rest are owned by the University. Support for max. 10 vehicles would cover two thirds of vehicle upgrades. However, we are not a small organisation so questionable whether we would receive any financial support." (Organisation, The University of Manchester)*

> *"Because I don't know how much I would be eligible for yet!" (Business, LGV)*

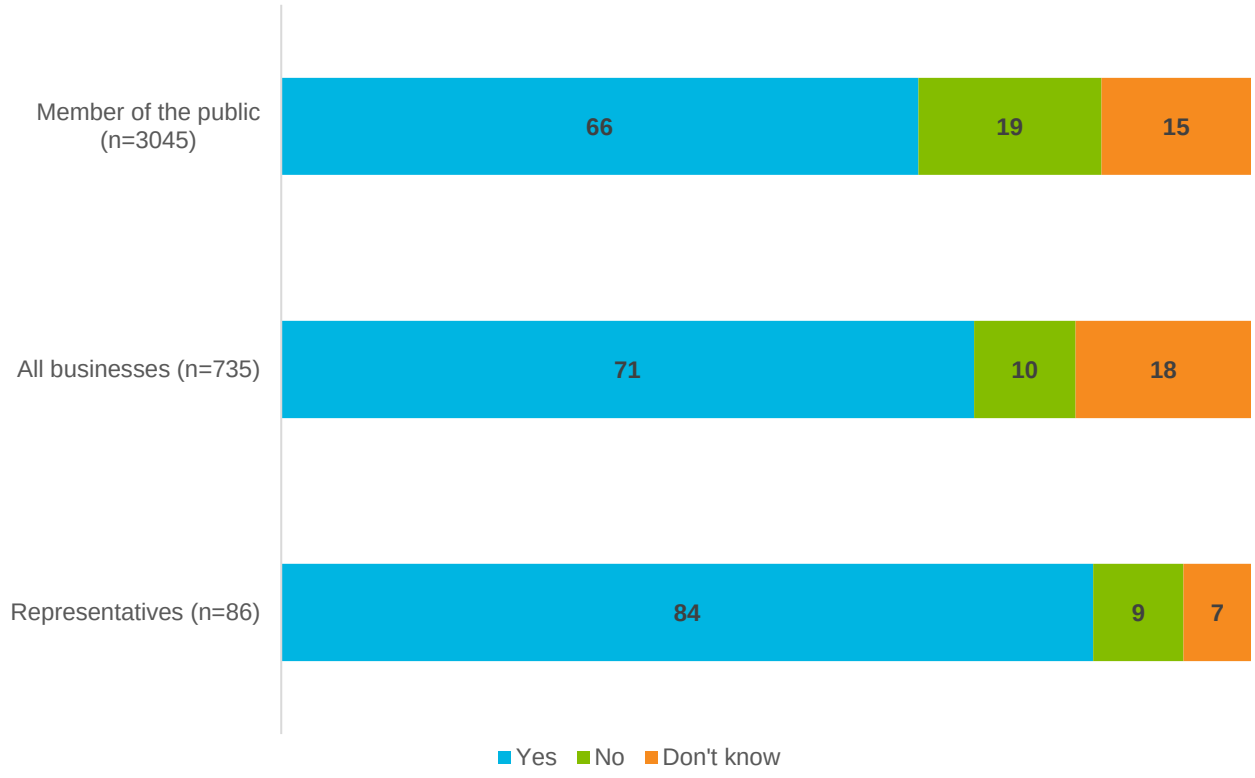
6.15 Hardship fund and additional financial support

The proposed hardship fund and support was introduced to all respondents in the questionnaire as follows:

Greater Manchester are proposing a Hardship Fund of at least £10m to support individuals, companies and organisations who are assessed to be most economically vulnerable to the Clean Air Zone daily charges. The scope and scale of support required will be considered in light of the impact of Covid-19 and the responses to this questionnaire.

Businesses and representatives were more likely to support the hardship fund than members of the public, however, at least two-thirds of each type of respondent supported this fund.

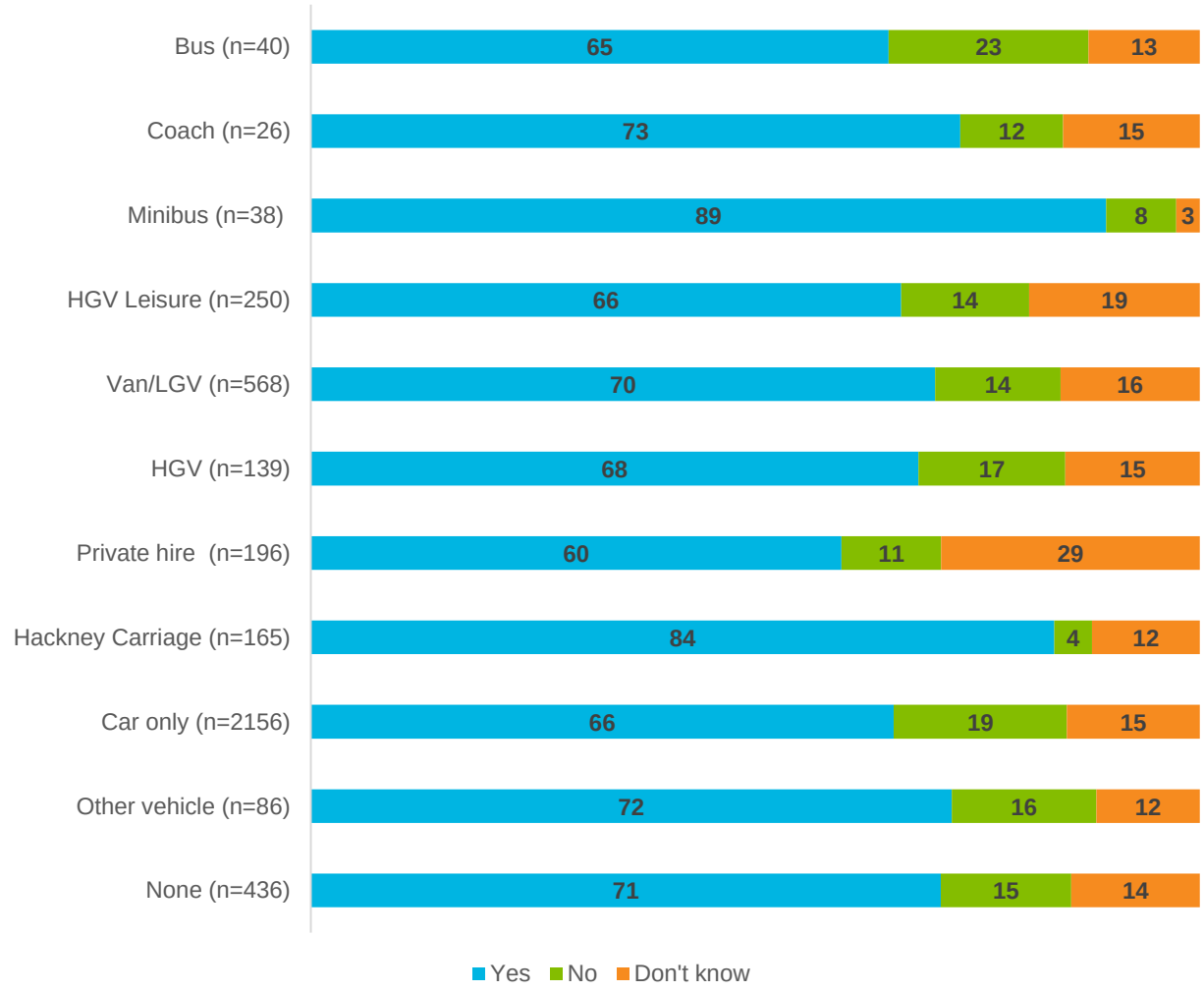
Figure 6.4 Respondents support of the hardship fund (%)



Base: All respondents

Of the respondents who owned a vehicle, minibus owners and HGV owners had the highest proportion to support the hardship fund (89% and 84% respectively). **Figure 6.5** shows the level of support for all vehicle owners.

Figure 6.5 Vehicle owners support of the hardship fund (%)



Base: All respondents
Caution should be used where base is small (n<50)

6.15.1 Comments about the Hardship Fund

Respondents were asked whether they supported the introduction of a Hardship Fund, and their reasoning as to why they agreed or disagreed with the idea. Over a third of respondents gave a comment.

A third of the public and businesses provided a comment about the Hardship fund of which over two thirds were supportive, stating it was vital to help those who are likely to be most economically vulnerable to the CAP charges, and ensure social equality. A minority opposed its introduction, arguing the funding was not required, or were concerned the system would be abused.

Table 6-6 Comments about the Hardship Fund

	General Public	Business	Representatives
Support the fund	844	206	41
Need more funding	53	30	4
Oppose the fund	148	21	3
Operation of the scheme	246	33	9
Operation of the scheme - prioritisation	115	17	6
Queries	15	7	1
Miscellaneous	33	10	3
Base	**1266**	**284**	**54**
Proportion of all respondents (%)	33	36	43

6.15.1.1 Support the fund

Comments in support of the fund included:

	General Public	Business	Represent-atives	Own impacted vehicle	No impacted vehicle
Support the proposed funding / needed for affected businesses	769	174	37	258	717
Funding is needed / important to ensure social equality	85	11	7	23	80
Funding needed for me / my business / to survive and continue operating	11	29	0	36	4
Base	**844**	**206**	**41**	**307**	**779**

There is a large amount of support for the introduction of a hardship fund from the public (n=769), business (n=174), and representatives (n=37). The main reasons given included.

Important to protect vulnerable organisations: Respondents across all groups are primarily concerned with protecting smaller businesses, charities and organisations that are an important part of the GM economy and have suffered considerably due to the Covid-19 pandemic. It is stated the fund is vitally important for ensuring a socially equitable transition to a cleaner city region:

> *"This is incredibly necessary to help reduce some of the unequal economic impacts of the Covid-19 pandemic, and to make sure that the transition to a more sustainable city is a fair, inclusive and just transition." (Public, aged 18-34, Private Vehicle)*

> *"Finding funds for an upgrade (to anything) can be difficult for many, impossible for some - so some financial capital support would help businesses who do not have the necessary cash to support development over and above average commercial maintenance." (Organisation, Transport for Sick Children)*

"We would agree that there are some groups will really struggle to get their vehicles to the right level to be compliant and should be supported as much as possible to get their vehicles to an appropriate standard." (Organisation, Walk Ride Heatons)

"There are a lot of smaller organisations who would genuinely struggle to replace their older vehicles. For the sake of everyone's health, it is vital that these vehicles are removed from the road ASAP." (Public, aged 18-34, No Vehicle)

"Especially since the pandemic it is very important to support vulnerable businesses who will be hit hard by the zone." (Public, aged 18-34, Private Car)

Ensuring social equality: Representatives (n=7) and members of the public (n=85) expressed the importance of minimising the impact of those who are most likely to be affected by the charges, ensuring businesses do not go bankrupt and are not put into debt:

"We are concerned that with the current economic environment, the proposals will have a consequential negative impact upon our patients and visitors on lower incomes, some of our key worker staff and also some of our local suppliers and organisations we may be seeking to work with as part of our social value strategy." (Organisation, The Northern Care Alliance NHS Group)

"We need to ensure that we are not increasing inequalities, therefore need to support those who most need support to maintain economic inclusion." (Public, aged 55+, Private Car)

"Whenever new regulations are introduced there are always people who fall below where the line is drawn and cannot afford to comply. To assist them to be compliant is the only fair way." (Public, aged 55+, Leisure HGV, LGV)

"We live in a fundamentally unequal society where people are systematically disadvantaged. We should take every opportunity to support those in harder circumstances, otherwise these policies are likely to further impoverish and disadvantage those most in need." (Public, aged 35-54, Private Car)

Funding is required to help my business to survive: Businesses (n=29) stressed the funding was vital to allow them personally or their business to survive and continue operating. A number refer to the impact of the current economic climate on their business:

"My industry has been massively hit by the pandemic, many drivers have already called it a day, gone bump, are now living on benefits or have sought work elsewhere so a hardship fund for those that remain struggling through on around £3 an hour would be a massive help…" (Business, Hackney)

"We operate liveried vehicles; this is an extra cost that would have to be taken into account even if the grants / finance cover the cost of the vehicle. We have operated as a family firm in our area for over 100yrs our vehicles are a big part of our advertising/presence in the area." (Business, Leisure HGV, LGV)

"because not all owners of HGV vehicles are large multinationals with unlimited resources, I will be financially hit hard by the CAZ zone." (Business, HGV)

"As a business we are already feeling the pinch of CV19 and have had to apply for bounce back finance. Taking on more debt for a new vehicle is not something we would be happy doing so any help would be welcomed" (Business, LGV)

"The Hackney trade could be decimated by a combination of the CAZ and Covid-19." (Business, Hackney)

6.15.1.2 Need more funding

Several respondents felt more funding was required:

	General Public	Business	Represent -atives	Own impacted vehicle	No impacted vehicle
A higher level of funding required for vehicles	53	30	4	36	51

Whilst the hardship fund is supported by the majority, there are concerns from several respondents of all types (public n=53; business n=30; representatives n=4) that there will not be an adequate level of funding available to support the transition to greener vehicles, given the level of increased hardship in the GM city region currently. Following the impact of Covid-19 and Brexit, contributors argue this has pushed more firms into financial difficulty, meaning more will need aid:

> *"The fund needs to be bigger. There is already lots of hardship out there before Covid-19 hit, and then Brexit, and then you want to charge the poorest businesses to drive in GM. Many businesses will be up to their eyes in debt due to Covid-19 and will be unable to access any more cash from lenders. Taking on more debt could make some businesses unviable. you will need to have a decent scheme that will enable those firms to carry on trading. Businesses will be fighting to survive but this CAZ will be the final nail in the coffin for a great many." (Public, aged 35-54, No Vehicle)*

> *"Because £10m is not enough for Greater Manchester when you have over 14,000 private hire vehicles and 2,500 hackney carriage in Greater Manchester." (Business, PHV Operator)*

6.15.1.3 Oppose the fund

The table below shows the most frequently given comments opposing the fund.

	General Public	Business	Represent -atives	Own impacted vehicle	No impacted vehicle
Funding should not be available / not needed	79	6	2	13	74
Oppose the hardship funding / it won't help those affected	49	10	1	15	43
Disagree with the fund because they disagree with the charges	15	4	0	4	15
Funding amount is too high / too much funding	6	1	0	2	5
Base	**148**	**21**	**3**	**34**	**136**

Funding should not be made available. Some members of the public (n=79) believe it is a waste of government funding to continue to support businesses that are unable to upgrade, either because the company is not financially viable, or because the firms should have considered the introduction of the CAP as part of their business planning:

> *"I do not believe that taxi or other non-compliant vehicle operators should be handed public money to do what they should already be doing. Private businesses should meet their own business costs, unless they can demonstrate that there is some*

public/community benefit to their area of business. Perhaps favourable loans could be made available to help upgrade their vehicles, but not hand-outs." (Public, aged 35-54, Private Car)

"Cleaner air polices should be at the heart of organisations corporate responsibility therefore why hardship for them failing to adapt" (Public, aged 18-34, Private Car)

Unjust to support road transport: Some opponents of the hardship fund, who are mainly from the public, felt it is unjust to support companies that have polluted and will continue to pollute in the GM city region for their own financial gain. It is argued by some that funding should be spent elsewhere to reduce emissions created by road transport, either by investing in public transport or active travel modes:

"These people have been allowed to create serious pollution for many years at no cost to themselves. Working near one of the most polluted roads in Manchester has probably damaged my lungs. I don't see why they shouldn't take the consequences of what they have done." (Public, aged 55+, Private Car)

Concerns about increases in taxation: There were some concerns raised by members of the public that the money required for the hardship funding would lead to increased taxation by local government bodies. They pointed out that businesses and the public are already struggling in the current climate, and increases to Council Tax, for example, would have a negative financial impact on them:

"I do not agree with the charges in the first place; if there were no charges there would be no need for a hardship fund. The hardship fund monies would come from the taxpayer, and so taxes would rise. This fund would be open to abuse and fraud and would cause an increase in bureaucracy." (Public, aged 55+, Private Car)

6.15.1.4 Operation of the scheme

The table below shows the most frequently given comments about the operation of the scheme.

	General Public	Business	Represent - atives	Own impacted vehicle	No impacted vehicle
Ensure funding is available to all those affected / fair to all	92	20	1	33	78
Concerns about people claiming for funding when not needed	73	6	3	7	75
Concerns about the funding being mis-managed	35	5	1	8	33
Concerns about where the funding is coming from	30	0	0	3	27
All those that operate GM and will be affected should be eligible	14	1	2	6	9
Needs to be well-advertised / promoted to ensure all those affected are aware and know how to apply for funding	9	1	1	2	9
Funding provided as a lump sum grant / not as a repayable loan	4	1	0	1	4
Base	**246**	**33**	**9**	**60**	**224**

Concerns about people claiming for funding when not needed: Members of the public (n=73) and representatives (n=3) are wary of people abusing the system, indicating it is vitally important to implement means testing to ensure those who need the aid most receive it, and to remove the possibility of fraudulent claims. Of concern was the prospect of larger firms having access to funding when it would not be required:

> *"This change will undoubtedly affect taxi drivers and some precarious workers who would struggle to meet the ongoing cost and also struggle to upgrade a vehicle. I'm concerned that larger companies and organisations will have the infrastructure to mobilise and claim hardship, where perhaps none exists." (Public, aged 18-34, Private Car)*

> *"It needs to be means tested. I do not think any company that is making profit should have access to funds when they absolutely have the means to pay themselves." (Public, aged 18-34, Private Car)*

> *"Either a hardship fund for the most vulnerable, or a proper exemption system for these cases. Must be properly checked though to prevent fraudulent use". (Organisation, Friends of the Trans Pennine Trail)*

Correct allocation of funding: Respondents from all groups (public n=35; business n=5; representatives n=1) also pointed to the importance of GMCA / TfGM / CAP allocating funding correctly, ensuring proper checks were made to ensure those who needed it most would receive it, and the system would therefore not be open to abusive claims:

"Loss of livelihood would be a genuine hardship. Eligibility should be clear, strictly monitored but not requiring over-cumbersome procedures." (Public, aged 55+, No Vehicle)

"Clear criteria must be established in order to access with proof required" (Public, aged 35-54, No Vehicle)

6.15.1.5 Operation of the scheme – prioritisation

The table below shows the most frequently given comments about the operation of the scheme - prioritisation.

	General Public	Business	Represent - atives	Own impacted vehicle	No impacted vehicle
Funds should be prioritised for sole traders/small businesses	62	9	4	16	58
Funding should go to those who need it most/should be means tested	33	5	1	7	31
Funds should be prioritised for voluntary / community / charities	21	1	2	5	19
Financial support for those who have recently upgraded their vehicle/s	1	2	0	0	3
Funding should only be provided to upgrade to hybrid / electric vehicles	2	0	1	0	3
Funding should only be paid after new vehicles have been invested in	2	0	0	0	2
Base	**115**	**17**	**6**	**28**	**109**

Support for smaller businesses and sole traders: Members of the public (n=62), businesses (n=9) and representatives (n=4) felt funding should be prioritised for smaller businesses, sole traders and charities to ensure they are able to become compliant. It was felt these firms have been badly affected by the current economic climate and will need an increased level of support to continue operating and invest in cleaner vehicles:

"The smaller business sector has been hit heavily by the current pandemic and there may be little scope for financial investment and many self-employed/SMEs will be struggling to stand still for the next financial year so would be unable to make investment." (Organisation, Communication Workers Union)

"Charities, scouts, churches, etc. would have fundraised hard to acquire such vehicles or had them donated. It may well be the case that they could not afford to upgrade their transport. Perhaps there could be a less stringent emissions level for such vehicles if there was no hardship fund." (Public, aged 55+, Private Car)

6.15.2 Additional support required by those impacted by the proposed clean air zone charges

Respondents were asked to detail any additional support they need if they are impacted by the proposed clean air zone charges. A third of businesses and a fifth of representatives provided a comment.

Most of the comments reiterated more support is needed.

Table 6-7 Comments about additional support

	General Public	Business	Representatives
Support offered is sufficient	10	11	0
More support needed	210	186	16
General / Eligibility / Time	20	22	3
Management of funding	18	8	1
Electric vehicles / charging infrastructure	105	25	9
Miscellaneous	32	44	4
Base	**360**	**261**	**25**
Proportion of all respondents (%)	9	33	20

6.15.2.1 Support offered is sufficient

The table below shows comments about no additional support is required.

	General Public	Business	Represent -atives	Own impacted vehicle	No impacted vehicle
No additional support needed / funding offered is good / fair / appropriate	10	11	0	21	0

No additional support required: Respondents (public n=10; business n=11) indicated they had no requirement for additional support, as the current proposals provide sufficient financial support to facilitate the transition, or they have been planning to upgrade vehicles as part of their business plan:

> *"We've had it in our plans for a while and are going to slowly move vehicles onto electric as it's the right thing to do." (Public, aged 18-34, LGV, Private Car)*

> *"No, we will comply at our cost, as we already have a Green Agenda. To provide a level playing field we would therefore expect any support for others to be carefully targeted and limited." (Business, LGV, HGV)*

6.15.2.2 More support needed

The table below shows comments about additional support is required.

	General Public	Business	Represent - atives	Own impacted vehicle	No impacted vehicle
More financial support /funding needed to upgrade vehicle/s	83	115	8	164	28
Should be given 100% of total cost / given a compliant vehicle for free	40	34	1	69	6
Funding should go to those who need it most / should be means tested	37	15	5	18	36
More funding - sole traders / smaller companies/organisations	20	10	2	12	17
All those affected by the proposals should be eligible for funding	15	15	1	23	5
Financial support needed to be able to pay daily charges	16	11	0	20	7
Funding should available to all vehicle types / fair to all	5	2	0	5	2
More funding – voluntary / community / charities	4	0	2	5	1
Funding for other costs - insurance, maintenance, other fees etc	1	4	0	3	1
Base	**210**	**186**	**16**	**291**	**100**

More financial support required. A substantial number of respondents from the public (n=83) and businesses (n=115) indicated more financial support was needed across the board to allow for upgrading. Currently, in their view, the financial packages available would either mean costs are passed onto the consumer, or would lead to financial difficulty for the individual or business:

> *"A reasonable package of support that would entice me to change to a compliant vehicle. The current level of support would mean I would run a non-compliant vehicle and pass the cost onto the customer in order to remain competitive." (Business, LGV)*

> *"Financial help to continue trading. Margins are already small, and the proposed costs would mean I would have to 'shut up shop' making myself and my 4 team members unemployed." (Business, LGV)*

Operators provided with 100% of the vehicle cost. Some businesses (n=34) stated being given 100% of the vehicle cost was the only fair way to compensate operators for the introduction of the CAP.

> *"Completely new vehicle." (Business, Leisure Vehicle, Private Car)*

> *"Fully funded car." (Business, PHV)*

Additional funding required for SMEs and Sole Traders: Members of the public (n=20), businesses (n=10) and representatives (n=2) stated there should be more funding for sole traders and small businesses, given the small margins they operate on.

"It would be useful to have some support for very small businesses who will suffer with increased transportation and supplier costs, and the reduction in customer volume." (Business, LGV)

Financial support for the charges. Members of the public (n=16) and businesses (n=11) indicated they would require financial support to pay for the charges, which they argue would be cheaper than upgrading newer vehicles:

"Yes, as a small business employing 20 members of staff, this could be a disaster as we are Merseyside based and cover a lot of deliveries and collections in and out of the Great Manchester region. We would need cheaper daily rates to continue using our Euro 5 engine HGVs or grants to help purchase more Euro 6 trucks" (Business, HGV)

6.15.2.3 General / Eligibility / Time

The table below shows comments about eligibility and timing.

	General Public	Business	Represent -atives	Own impacted vehicle	No impacted vehicle
More time needed to adapt to the proposals	9	19	2	20	6
More time to allow electric vehicle technology available and cheaper	11	4	2	6	9
Base	**20**	**22**	**3**	**25**	**15**

More time needed to adapt to the proposals. Respondents (public n=9; business n=19; representatives n=2) indicated they would need more time to adapt to the current proposals, allowing for a more gradual replacement of vehicles within their fleets, and allowing some vehicles to reach the end of their natural life cycle which would reduce costs for businesses and reduce the amount of people requiring funding:

"Phased introduction of zone would reduce the financial support required as fleets will usually replace older vehicles periodically due to natural life cycle of assets." (Business, LGV, HGV)

Management of funding

The table below shows comments about management of funding.

	General Public	Business	Represent -atives	Own impacted vehicle	No impacted vehicle
Discounted charges for those who travel within the boundary frequently / those who pay in advance	6	6	0	10	2
Concerns where funding is coming from for this	7	1	1	1	7
Needs to be well-advertised	5	1	0	2	4
Base	**18**	**8**	**1**	**13**	**13**

Discounted charges for those who travel within the boundary frequently. Business respondents (n=6) argued for discounted charges for those who travel within the boundary frequently, but are not located within GM, or those who need to make one-off journeys:

"A local business discount scheme & payment portal, which would allow for weekly or monthly payments by vehicle (to reduce admin requirements) & details of accredited, approved & extremely reputable vehicle emissions specialists who can retro fit modifications to assist with Euro 6 compliance." (Business, LGV, HGV)

"We could have a discounted rate if we are only serving the outskirts of the inclusion zone and not going into any built-up urban areas" (Business, LGV, HGV)

6.15.2.4 Electric vehicles / charging infrastructure

The table below shows comments about electric vehicles and charging infrastructure.

	General Public	Business	Represent - atives	Own impacted vehicle	No impacted vehicle
Availability of electric charging infrastructure	71	15	6	14	67
Should be more incentives to upgrade to electric / hybrid	29	3	1	4	28
Concerns about performance / availability of electric vehicles	12	9	3	7	13
Base	**105**	**25**	**9**	**25**	**99**

More financial support for electric / hybrid vehicles: Members of the public (n=29) would like to see more support for the transition to electric / hybrid vehicles, to ensure vehicles are being upgraded to zero / ultra-low carbon emission producers:

"…. I would hope businesses as well as the public will be properly supported to go electric, for example, and that such vehicles would be exempt. With additional support and advice/ideas for businesses to rethink how they can conduct their businesses in more sustainable ways…." (Public, aged 35-54, No Vehicle)

Lack of electric vehicle infrastructure: A large number of respondents (public n=71; business n=15; representatives n=6) who commented are very concerned about the currently available electric charging points in Greater Manchester.

"Not really we've had it in our plans for a while and are going to slowly move vehicles onto electric as it's the right thing to do. If money could go to charging infrastructure that would be nice particularly encouraging blocks of flats to put in chargers." (Public, aged 18-34, LGV, Private Car)

7. Impact of Covid-19

Summary of findings:

- 76% of business and 79% of taxi owners, who responded to the survey, have been financially impacted by Covid-19.
- Over 80% of those financially impacted stated the financial impact included a lower turnover, making it the most common financial impact amongst respondents closely followed by lower profit.
- Businesses reported increased financial pressure, and many stated they could not afford to upgrade their vehicles at this time.
- Members of the public provided mixed views of Covid-19, some felt the goal to improve air quality should not be delayed by Covid-19 and the pandemic had highlighted the importance of air quality. Conversely, a similar number suggested that proposals should be reviewed due to the financial impact of Covid-19 on them and on businesses.

7.1 Introduction

Businesses, taxi drivers and operators and organisations were asked specific questions about the impact of Covid-19 on their business. All respondents were given the opportunity to provide comments about the impact of Covid-19 on their response to the proposals.

7.2 Level of impact

Figure 7.2 shows how respondents with different types of vehicle have been financially impacted by Covid-19. Overall, 76% of businesses and 79% of taxis owners and drivers that responded have been financially impacted.

Bus (95%) and coach (91%) operators have been the most impacted.

Figure 7.2 Financially impacted by Covid-19 (%)



Base: All businesses, taxis and organisations
Caution should be used where base is small (n<50)

Respondents were asked whether they had seen a financial impact due to Covid-19, using four criteria, level of debt, level of savings, turnover and profitability. The following definitions were used, for the purpose of this report, for a taxi driver, operator or business to be financially impacted by Covid-19.

Financial impact	Description
Financially impacted by Covid-19	A taxi driver, operator or business who has stated they have more debt or less savings or lower turnover or lower profitability as a result of the Covid-19 pandemic
Not financially impacted by Covid-19	A respondent who has stated they have either the same or less debt, the same or more savings, the same or higher turnover or the same or higher profitability as a result of Covid-19

Overall, 77% business, taxis drivers and operators and organisations have been financially impacted by Covid-19. The general public and representatives were not asked about the financial impact of Covid-19.

The table below shows the way each type of vehicle owner has been impacted by Covid-19. Of those financially impacted by Covid-19, 80% had received at least one type of financial support whether this was via the job retention scheme, a Government grant or loan, a business grant, self-employment income support or any other financial support. Of those who stated they had not been financially impacted by Covid-19, 44% had received at least one type of financial support.

The full breakdown of the financial impact of Covid-19 is shown in the data tables provided in **Appendix B.**

Table 7-1 Financial impact of Covid-19

Financial effect	Base (n)	Level of debt increased (%)	Reserves / Savings reduced (%)	Turnover lower (%)	Profitability lower (%)
Bus	19	62	79	90	95
Coach	23	35	63	100	90
Minibus	26	62	68	80	85
Van / LGV	303	65	74	86	82
HGV	108	69	80	90	90
Private hire	187	75	75	92	93
Hackney carriage	162	61	82	90	88
Private car (only)	23	50	64	83	73
Other vehicle	80	64	90	100	100
No vehicles	27	62	79	90	95

Base: all respondents financially impacted by Covid-19
Caution should be used where base is small (n<50)

7.3 Comments about the impact of Covid-19

In order to understand the impact of Covid-19 on businesses and organisations, these respondents were asked to detail how the pandemic would affect their ability to meet the clean air plan proposals. The general public were asked about the impact of Covid-19 on the proposals.

Half of businesses and representatives and a third of the public provided a comment. The table below shows the main comments made by each type of respondent:

Table 7-2 Comments about the impact of Covid-19

	General Public	Business	Representatives
Impact of Covid-19 on business	486	369	40
Impact of Covid-19 on public	352	58	9
Timing / need for the proposals	385	47	20
Air quality	284	31	17
Funding	67	4	4
Miscellaneous	216	38	8
Base	**1266**	**411**	**65**
Proportion of all respondents (%)	33	52	52

7.3.1 Effect of Covid-19 on business

Respondents provided comments on Covid-19's effect on their business and how it impacts their efforts to comply with the proposals.

	General Public	Business	Represent-atives	Own impacted vehicle	No impacted vehicle
Increased financial pressures / income has fallen	281	279	27	308	272
Proposals are unfair as businesses are struggling due to Covid-19	228	104	13	134	209
Cannot afford to upgrade my vehicle/s due to Covid-19	43	95	7	102	35
Business may close / cease to operate due to Covid-19	24	40	3	40	26
Debt has increased / cannot afford more debt due to Covid-19	5	44	5	44	7
Brexit is causing issues / uncertainty about business performance	34	13	4	15	32
Savings / reserves have been used up/almost exhausted	8	30	7	33	8
No impact on my business/businesses / business has increased	4	30	2	16	18
Business is not eligible for financial support	3	21	3	20	5
Staff job losses / furloughed due to Covid-19	3	14	4	14	3
Base	**486**	**369**	**40**	**417**	**456**

Increased financial pressure: Over half of businesses (n=279), especially those with vans (n=127) and taxi drivers (n=130), stated they had increased financial pressures and / or income has fallen as a result of Covid-19:

> *"Our business has been decimated by Covid. We have seen all our event work cancelled. Our CCTV video services have been impacted severely as it was rated to the pubs/clubs. We still have our domestic video services but it's tiny with few customers. The phones and emails are virtually dead. We had a strong small business with three different strings to our bow. Two of those areas have been killed by Covid. Entirely gone. Those two areas represented most of our turnover and paid the bills. The third area provided a bit of fill-in between other jobs. Even that is down massively. I'm seriously considering packing in and getting a job at Tesco" (Business, LGV)*

> *"The Covid 19 pandemic meant that I was unable to work for a while, creating long term financial difficulty. Hence, it will be an issue to pay charges on a daily." (Business, PHV)*

Proposals are unfair on struggling businesses: A quarter of comments received from businesses (n=104), especially those with vans (n=40) and taxi drivers (n=49), stated the proposals are unfair because businesses are already struggling due to Covid-19 and national restrictions made them reduce or stop trading:

> *"However, as businesses still cope with the increasing economic impact from Covid19 and the looming threat posed by Brexit we believe that under the current format the proposals will add another layer of economic uncertainty and heap more financial pressure on many sections of the business community." (Organisation, Chamber of Commerce)*

> *"Sadly and totally due to the Covid-19 pandemic we have lost all of the other work we carried out on a daily and weekly basis, this includes Airport runs, days out, sporting activities and matches, festivals/concerts, race days stag/hen party's, weddings, birthday celebration, the list goes on, the impact of the Covid-19 virus pandemic has removed all of this work, making achieving the proposals impossible." (Business, PHV)*

> *"If the pandemic and conditions continue, to impose another charge on struggling businesses would be a death knell to many." (Business, LGV)*

Cannot afford to upgrade vehicle/s: Around a quarter of businesses (n=95), in particular owners of vans (n=44) and taxi drivers (n=42), stated that due to the financial loss Covid-19 created for them, they are unable to upgrade their vehicles to comply with the proposals:

> *"Its going to be struggle replacing vehicle. We were already struggling mainly due to out of town vehicle being allowed to work in Manchester with Covid will prove last nail in coffin" (Business, Hackney)*

> *"Income generated is not enough to buy a new vehicle that will be compliant with clean air zone." (Business, Hackney)*

> *"Capital replacement projects have been delayed as business priorities have been altered by the pandemic." (Business, LGV, HGV)*

Increased debt: Around a tenth of businesses (n=44) commented their debt has increased during the pandemic due to loss of regular income and they cannot afford to take on more debt to comply with the proposals:

> *"It has destroyed me financially. left me with massive debts. I am in negative equity. No income to help pay my finance. Struggling on a daily basis going without any luxuries in life. living from hand to mouth. keep asking for payment breaks." (Business, Hackney)*

> *"Covid19 destroyed my income. I am living on universal credits which hardly covers my home rent and day to day expenses." (Business, Hackney)*

Business closures: Businesses (n=40) stated they may close / cease to operate if the CAZ is introduced. This is due to the loss of work since the pandemic, keeping their business open and running may no longer be financially viable if the proposals are introduced:

> *"If you introduce this then we are closing the business." (Business, LGV)*

> *"With Covid-19 i am already thinking of leaving the current job and go in to a different job." (Business, Hackney)*

Savings / reserves have been used up: Businesses (n=30) stated in their comments they had to use their savings in order to survive the pandemic. Since there wasn't a steady income coming in, these savings have been almost exhausted:

> *"Increase in outgoings as cost have remained the same. Less incomings. No support from government or LA. Savings being utilised to get through this period which would have helped under normal pre-pandemic circumstances in financing a newer compliant vehicle." (Business, PHV)*

> *"The pandemic has eaten away at any reserves I had that would have gone towards meeting the criteria outlined in the consultation document." (Business, PHV)*

> *"We no longer have savings available to put towards a clean air compliant vehicle." (Business, LGV)*

In the focus groups, businesses highlighted how Covid-19 has impacted their business and they described how they are struggling to remain financially viable. The lack of trade in 2020 and the uncertainly for 2021 has made business unable to commit to any type of investment:

> *"We are event florists, and we haven't been doing any events this year. All events postponed or cancelled, and we have had to refund money, and it has been damaging to the business. You know, we are coming to the crunch point now, yeah, and as we move into January and February, which is a traditionally quiet time of year in our industry, that is where it is going to be really difficult." (Focus Group: LGV)*

> *"Covid-19 has affected all our businesses with the restrictions, and many businesses in our industry will not re-open, I don't think. Reduced turnover, and the changes in the working world because of Covid-19 and businesses we supply to not operating etc. It is a real struggle and will be for a while yet. I'm not sure if we will survive it. "(Focus Group: LGV)*

Others worry the knock-on effects of Covid-19 will be felt in their financial credit ratings for any future borrowing they consider:

> *"The thing to consider also is with the current Covid situation, everyone's credit ratings will be getting downgraded anyway, because of, you know, there's a lot of hesitancy out there for people to lend, isn't there, at the moment. So, even if you know, twelve months, two years, you could have got the credit, maybe you might be downgraded 10% or something, you know, 50%, you don't know until you need it. But a lot of companies won't be in the same position now than they were twelve months ago." (Focus Group: HGV)*

Although they changed their methods and adapted in order to still trade during the restrictions, these changes resulted in an increase in costs for the business:

> *"And most of my vans are five-seaters, so before this, I was sending like five lads to a job in one van, but now I'm sending three vans to one job, with five men. Obviously, it's costing more with everything, because I could send five men to one job in one van, but now I've got five men to a job in three vans. We basically would sign a contract to say one of my contracts has got three hundred hours on it, it might last six years, and when you sign it, it says duration of contract, so I can't re-coup those costs." (Focus Group: LGV)*

7.3.2 Effect of Covid-19 on individuals

Individuals also provided comments on Covid-19's effect on them.

	General Public	Business	Represent-atives	Own impacted vehicle	No impacted vehicle
Increased financial pressures / costs for me/individuals	261	55	9	121	201
No impact on me	80	0	0	17	63
Covid-19 has made it more difficult to use buses / public transport	9	2	0	3	7
Covid-19 is having a negative impact on lower income households	7	1	0	3	5
Base	**352**	**58**	**9**	**142**	**273**

Almost a quarter of the general public (n=261) stated they have had increased financial pressures / costs as a result of Covid-19 due to job losses and furlough. Those respondents who own an impacted vehicle such as leisure HGV or van (n=74) have also identified the proposal would add to these pressures.

> *"People will still be getting over Covid restrictions having lost months of money. This is heartless. People are struggling having taken out loans, using life savings etc. This new charge is cruel to some of the lowest paid" (Public, aged 35-54, Private Car)*

> *"During Covid I have worked all the way through as a front-line worker, if these costs came in to place my wages would be decreased massively due to my travel outgoings. Which would impact on my family life, home, costs." (Public, aged 35-54, LGV, Private Car)*

> *"Just as people are on the breadline, made redundant and can't get jobs you now want to charge people to drive." (Public, aged 35-54, LGV, Private Car)*

> *"Many of us are already just trying to survive as a result of the pandemic - these plans could make life even harder." (Public, aged 18-34, LGV)*

7.3.3 Timing / need for the proposals

There were opposing views about the timings of the proposals:

	General Public	Business	Represent-atives	Own impacted vehicle	No impacted vehicle
Proposals should be delayed until after Covid-19	213	45	14	90	172
Covid-19 pandemic is temporary should not delay proposals	174	2	6	9	172
Base	**385**	**47**	**20**	**99**	**342**

Shouldn't delay the proposals: Members of the public (n=174), almost all who do not own an impacted vehicle, were more likely to state the pandemic is temporary and the proposals should not be delayed with many stating clean air should be priority and the proposals would also help to reduce the impact of Covid-19:

> *"It's a difficult time for businesses to adapt to clean air rules but clean air/our health has to be prioritised. Won't clean air be more important if we have many people living with the long-term effects of Covid-19." (Public, aged 35-54, Private Car)*

Proposals should be delayed: Conversely, members of the public (n=213), businesses (n=45) especially those with vans (n=13), representatives (n=14) and taxi drivers (n=22) commented that the proposals should be delayed until after the pandemic has passed. This would allow businesses to recover from the pandemic and be able to upgrade their vehicles:

> *"The business did not operate for 2 months during the first lockdown. Our overheads such as rent and insurance did just continue to have to be paid. The business will simply not make any profit and probably a loss this financial year. To recover from this is going to take time. If we make profit, we have some money to invest in new vehicles or equipment. Without profit we just have to try to keep going without any additional expenditure." (Business, LGV, HGV, Private Vehicle)*

Focus group respondents reported they were so focused on trying to make it through Covid-19 and the short term, they could not begin to think about the long term. As one said, they may not have a business by then:

> *"I think the big issue is the industry has got no money. We've all had nine months, pretty much twelve months without earning any money. Nobody's going to have the money to invest in vehicles next year. Nobody's investing this year, so everybody's a year behind where they were. There's not going to be the money next year, because we're not going to be as busy." (Focus Group: Minibus, Coach)*

7.3.4 Impact of Covid-19 on perception of air quality

There were opposing views on the impact of Covid-19 on air quality from the public both in the questionnaire and in the Focus Groups in particular:

- Covid-19 has proved what air quality could be like and highlighted the need to continue with the proposals; **or**
- Covid-19 has already improved air quality and alongside the expectation more people will work from home, it means the proposals should be reviewed.

	General Public	Business	Represent-atives	Own impacted vehicle	No impacted vehicle
Covid-19 has highlighted the need to improve air quality	138	2	9	6	132
Proposals should be reviewed due to the improvement in air quality as a result of the Covid-19 lockdown	123	28	9	57	95
Work from home will reduce air pollution as a result of Covid-19	33	2	3	13	24
Base	**284**	**31**	**17**	**68**	**246**

Highlighted the need to improve air quality (public n=138; representatives n=9): Members of the public without an impacted vehicle (n=128) stated experiencing better air quality during lockdown had enabled them to see/feel the difference in air quality. It also highlighted air quality does impact health conditions:

> *"I did see a lot of things about the fact that, you know, people weren't really doing very much, and they weren't going out and, obviously, because of that, that meant that like … I think I saw like a picture of Venice, that the water was clear for the first time ever or something." (Focus Group: Public, aged 18-34)*

> *"Well, I mean I go back to the first lockdown as well, I had the good opportunity of going to a top floor, high hotel in Manchester and I could see the difference between the quality of the air, if you know what I mean, you can't, you can sometimes see a haze over the city, whether that was in the morning or at night, you could certainly see it and during the lockdown even after ten days of the first lockdown I could certainly see a difference in the air quality." (Focus Group: Public, Aged 40+)*

> *"Covid-19 presents another health condition that is exacerbated by air quality issues and increases the need for the clean air zone proposals. However, it also increases financial stresses on individuals and businesses I would conclude that the clean air zone proposals remain, as a whole, well balanced" (Public, aged 55+, Private Car)*

Air Quality had improved due to reduced traffic and therefore the need for the proposals should be reviewed (public n=123; business n=28; representatives n=9)

> *"I've been working at home since March and I think it's going to continue for some time really, and I think it's changed, you know, certainly my like office environment. I think everybody's thinking it's never going to back, because I only worked three days anyway, you know, but I don't think I'll be going back to working three days in the office at all, really. Perhaps I might be just doing one day, one day a week or something in the office, but the rest of the time, I think it's going to continue to be at home for the foreseeable future." (Focus Group: Public aged 40+)*

> *"Yes surely the whole zone and the data that formed its thinking should be checked to see if still valid especially in the city centre. How many people will actually come back into work here? (Public, aged 35-54, Private Car)*

Mainly businesses with vans (n=14) and taxi drivers (n=13) felt not only had air quality improved because of lockdown it would not return to previous levels as peoples' travel behaviour had been permanently changed and it was expected more people would continue to work from home after the pandemic.

> *"Clean air zone too large. Target hotspots and charge a fuel levy to bring in funds to improve transport options. The new business landscape post Covid will be very different. Home working will reduce many journeys. Natural wastage will see less and less older vehicles on the road anyway. A petrol/diesel levy would encourage EV ownership too." (Business, LGV)*

8. Overall impact of the Clean Air Plan

Summary of findings:

- 74% of the public and 80% of representatives agree that air quality needs improving in Greater Manchester, while only 45% of businesses agree with this.
- 35% of the public and 40% of representatives are confident that the Clean Air Plan will bring down NO_2 levels. Just 23% of businesses feel the same way.
- Of those that provided a comment, around one third of the public, a quarter of representatives and a tenth of businesses commented that the proposals should go further and include private vehicles.
- Concerns were raised that prices will increase as a result of the proposal and there will be a negative impact on businesses.
- A quarter of businesses who commented felt the proposals will negatively impact them and some described the proposals as another form of tax and / or congestion charge.
- Almost a third of the public who provided a comment felt improving public transport and options for active travel would help improve air quality.

8.1 Introduction

This chapter provides the feedback from all respondents about the impact the introduction of the Clean Air Plan will have on them and their confidence in the Clean Air Plan to bring down roadside nitrogen dioxide to meet legal levels in the shortest possible time.

8.2 Air quality

All respondents were asked:

To what extent do you agree or disagree that air quality needs to be improved in Greater Manchester?

Figure 8.1 shows more of the public and representatives strongly agree that air quality needs improving in Greater Manchester compared to businesses.

Figure 8.1 Agreement air quality needs improving in Greater Manchester (%)



Base: All respondents

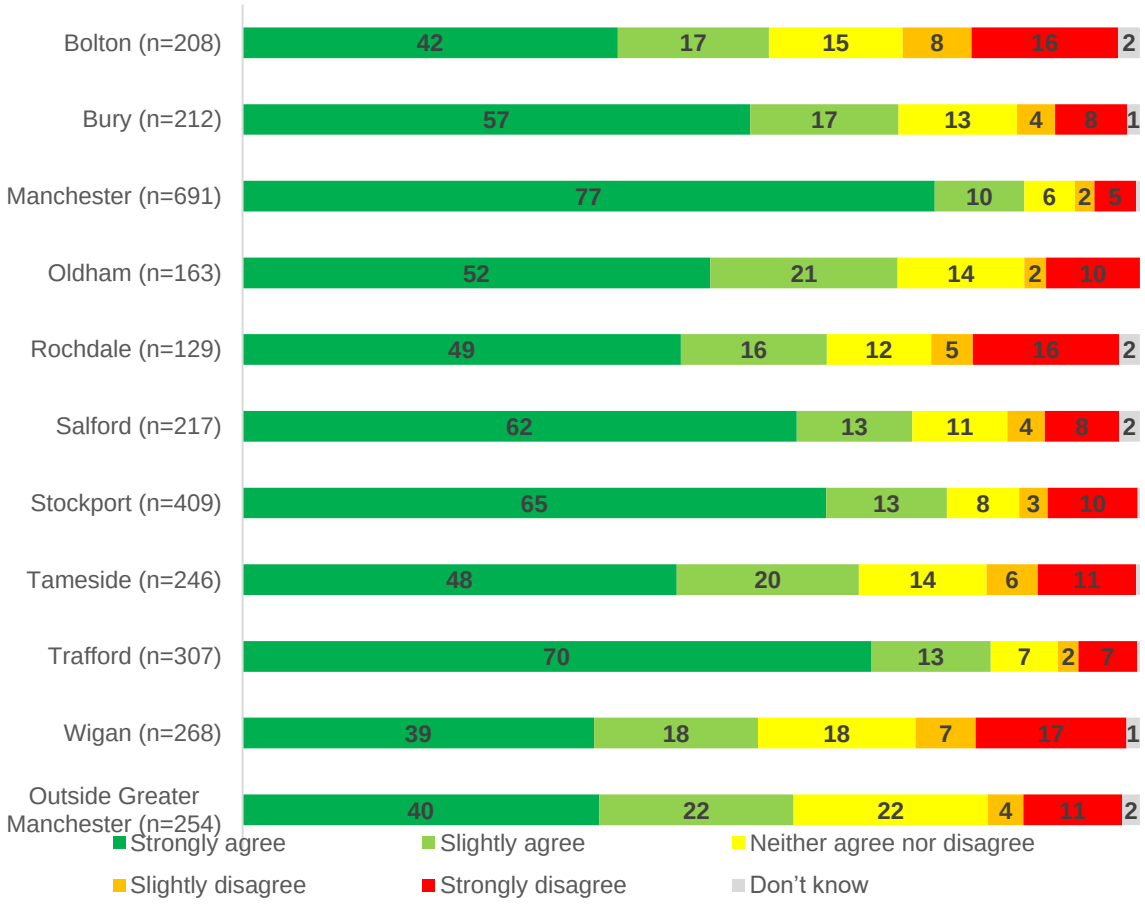
Summary of findings: General public and representatives

- 74% of the general public and 80% of representatives agreed air quality needs improving;
- Those aged under 35 are more likely to strongly agree air quality needs to be improved compared to other ages (67% compared to 57% aged 35-54 and 59% aged over 55);
- Significantly more respondents who live in Manchester (87%) either agree or strongly agree air quality needs improving than those living in other areas. Wigan (57%) and Bolton (59%), Rochdale (66%) and Tameside (68%) had the lowest levels of those who strongly agree or agree air quality needs improving in Greater Manchester; and
- Most (91%) of those who said they were vulnerable to air pollution for health reasons agreed it needs improving.

Other findings:

- 45% of businesses felt air quality needed to be improved; and
- Almost all (89%) of respondents who do not own a vehicle stated they agree or strongly agree air quality needs improving, compared to
  - Van / LGV owners (52%);
  - HGV leisure vehicle owners (49%)
  - HGV owners (45%);
  - Private hire vehicle drivers (45%); and
  - Hackney carriage drivers (26%).

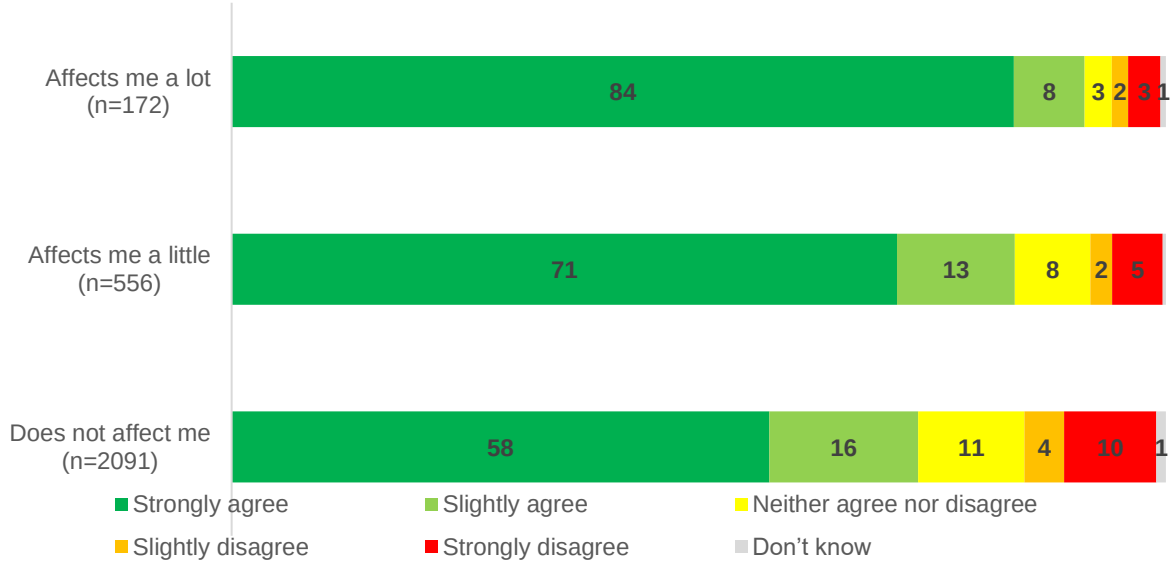
Figure 8.2 Agreement air quality needs improving by Local Authority (%)



Base: All members of the public

The proportions of the public strongly agreeing air quality needs to be improved increases with greater health impacts of air pollution, as shown in **Figure 8.3**.

Figure 8.3 Agreement air quality needs improving, and the affect air pollution has on the respondent's health (%)



Base: All members of the public

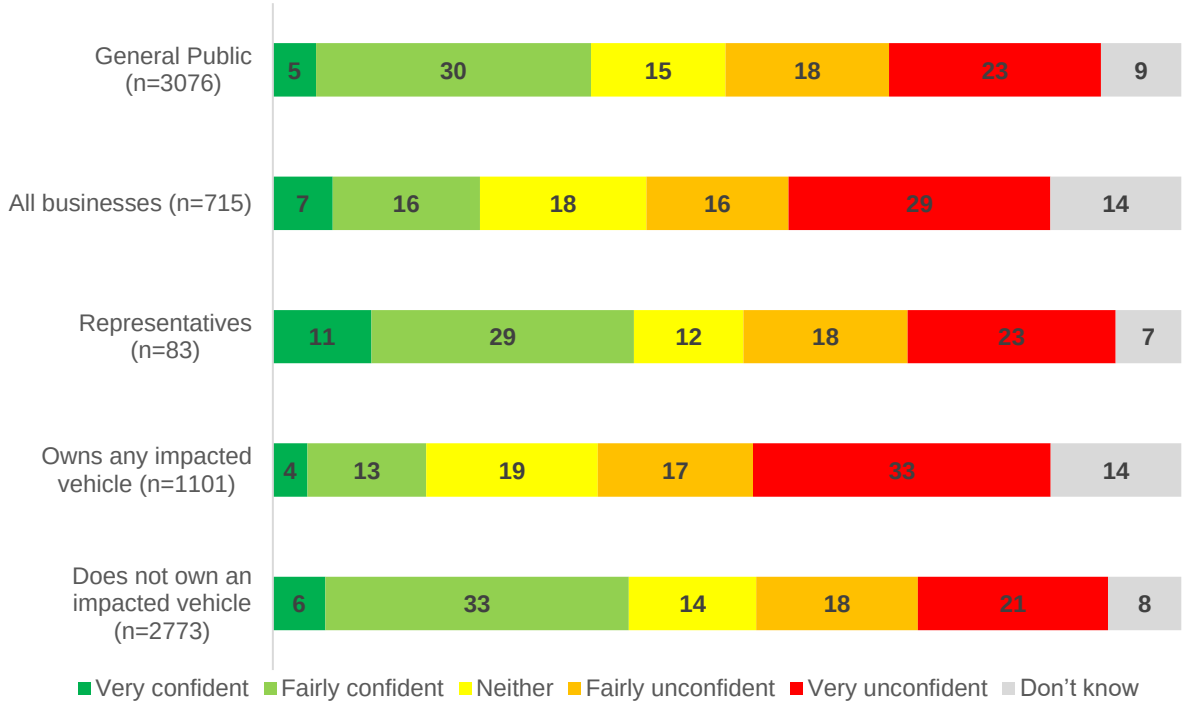
8.3 Confidence in the Clean Air Plan

All respondents were asked:

How confident are you that the Greater Manchester Clean Air Plan would bring roadside nitrogen dioxide (NO_2) levels within legal limits in the shortest possible time?

Figure 8.4 shows the response to this question for each type of respondent. There are more members of the public unconfident than confident the CAP will bring down the levels of NO_2 in the shortest possible time (35% confident and 41% unconfident). The confidence of all other respondents is similar to the general public, with businesses having the highest proportion of respondents who are unconfident (48%).

Figure 8.4 Confidence the CAP will bring down NO_2 levels (%)



Base: All respondents

Difference of option by respondent type

Respondents who are described as confident or not confident below is based on the total for those who stated either fairly or very for their level of confidence.

- Of the public, those aged under 35 (43%) and aged 35-54 (43%) were not confident compared to those aged over 55 (34%). 40% of men were not confident compared to 34% of women;
- The public who live in Manchester, Stockport and Trafford were more likely to be confident, (41%, 38% and 40% respectively) about the Clean Air Plan, than those in Bolton (25%) and Wigan (24%);
- Those whose day-to-day activities are limited had the same level of confidence as those who have no limitations (both 37% confident, with 40% of those with limitations unconfident and 38% of those who do not have limitations unconfident);
- 40% of businesses with over 50 employees (medium and large) were confident about the Clean Air Plan compared to 14% of sole traders and 17% of micro businesses. Around half of sole traders and micro businesses were unconfident in the Clean Air Plan (52% and 48% respectively);
- Those who own an impacted vehicle were not confident in the Clean Air Plan compared to those who do not (48% and 38% respectively). Those who do not own an impacted vehicle are evenly split with both 38% confident and unconfident; and
- Respondents who do not own a vehicle were more likely to be confident in the Clean Air Plan (45%) than those who own an HGV leisure vehicle (11%), a van/LGV (17%), a taxi (23%) or an HGV (27%).

Table 8-1 shows how much confidence respondents have in the Clean Air Plan to bring down NO_2 in the shortest time based on whether they agree air quality needs to be improved.

Table 8-1 Confidence in CAP and agreement air quality needs to be improved (%)

		Air quality needs to be improved in Greater Manchester %				
		Strongly agree	Slightly agree	Neither agree nor disagree	Slightly disagree	Strongly disagree
Confidence in Clean Air Plan to bring down NO_2 in shortest time %	Very confident	5	0	0	0	0
	Fairly confident	25	4	1	0	0
	Neither confident nor unconfident	7	4	4	1	1
	Fairly unconfident	11	4	3	1	1
	Very unconfident	7	3	5	2	9

Base: All respondents, excluding those who said don't know. (n=3449)

- 34% of all respondents agree air quality needs improvement and are confident the CAP will bring down NO_2 in the shortest time;
- 36% of all respondents agree air quality needs improvement and are neither confident / unconfident or are unconfident the CAP will bring down NO_2 in the shortest time; and
- 27% of all respondents did not agree (including neither agree nor disagree) that air quality needs improvement and equally are not confident the CAP will bring down NO_2 in the shortest time.

The next section summarises comments from respondents which indicates why they do or do not have confidence in the CAP to bring down NO_2 in the shortest time. The comments provided include:

1. Reasons the CAP is supported;
2. Reasons the CAP is not supported; and
3. Suggested amendments for the CAP to go further.

These suggested amendments may be considered as reasons why people feel air quality needs to be improved but they are not confident the CAP will bring down NO_2 in the shortest time.

8.4 Additional comments on the proposals

Respondents were asked to provide any additional comments on the proposals. Throughout the questionnaire respondents frequently gave additional comments. These have been collated and presented here.

Almost three quarters of the general public and representatives gave an additional comment as did 60% of businesses.

The general public and representatives tended to give supportive comments and suggested amendments or other measures to assist with improving air quality whereas businesses mainly raised concerns with the proposals.

Table 8-2 Additional comments on the proposals

	General Public	Business	Representatives
Supporting the proposals*	1369	94	48
Opposing the proposals	1063	363	30
Suggested Amendments	1647	171	47
Sustainable Travel	834	52	27
Miscellaneous	501	67	28
Base	**2778**	**472**	**87**
Proportion of all respondents (%)	72	60	70

The consultation identified two email campaigns (**see section 2.2.2** for details).
* comments received from both campaigns; Environmental Bill Lobby (n=172) and CAZ support group (n=484); 656 in total.

8.4.1 Supporting the proposals

Comments supporting the proposals included:

	General Public	Business	Represent-atives	Own impacted vehicle	No impacted vehicle
Support the proposals	976*	40	33	50	318
Proposals should go further	894*	25	18	24	253
Implement the proposals sooner / as soon as possible	797*	8	5	11	147
Older / most polluting vehicles should be targeted / replaced	112	25	1	30	108
All taxis should be cleaner / greener (e.g. electric, hybrid, hydrogen)	42	4	0	7	39
Air quality is still an issue in respect of other pollutants	40	6	3	12	36
Base	**1369**	**94**	**48**	**119**	**701**

The consultation identified two email campaigns (**see section 2.2.2** for details).
* comments received from both campaigns; Environmental Bill Lobby (n=172) and CAZ support group (n=484); 656 in total.

Support: Over a third of members of the public and representatives commented they were in support of the proposals generally, with many stating 'air quality is important' especially with Covid-19 and other respiratory illnesses. Almost a tenth of businesses and taxi drivers gave supportive comments about the proposals (public n=976; business n=40; representatives n=33):

> *"Great that GM is attempting something so ambitious for the good of local health and wellbeing, and the environment." (Public, aged 35-54, Private Car)*

> *"I believe this is an excellent idea, especially by it reducing NO².” (Public, aged under 18, No Vehicle)*

"As someone who mostly walks/cycles I absolutely welcome the initiative. I also support the mitigating measures for support of transport businesses. I also feel that the charges for polluting commercial vehicles are only one of various ways to tackle the pollution problem. Radical and strictly enforced speed limits across GM combined with an extension of bus/taxi lanes and bike lanes would reduce pollution and also make walking and cycling safer, and discourage the use of private vehicles." (Public, aged 35-54, No Vehicle)

"We all need to be proactive in helping with Pollution and peoples health." (Business, LGV, HGV)

"its going to happen. it will be painful but 5 years on it will be better for the area" (Public, aged 55+, Leisure HGV, Private Car)

"I think its very well thought through and you have plans to deal with sharing out the money fairly" (Business, LGV)

However, a third of the public, a fifth of representatives and almost a tenth of businesses who provided a comment, suggested whilst the proposals are good, **they should go further;** for example, include private vehicles which are still polluting the air and causing congestion. (public n=894; business n=25; representatives n=18):

"I don't think it will be taken seriously. I think the action needs to be more urgent with a nearer deadline." (Public, aged 35-54, No Vehicle)

"Seems to be 'a drop in the ocean'" (Public, aged 18-34, Private Car)

"I don't believe they go far enough" (Public, aged 18-34, Private Car)

"Not big enough modal shift" (Public, aged 35-54, Private Car)

"I'm not sure there is enough to actually reduce the number of cars. It's not just about air pollution, traffic increases noise pollution and reduces general quality of life. In Manchester city in particular there needs to be a curb on the number of private vehicles. This is less of a problem in the surrounding areas of Greater Manchester. It doesn't seem logical to apply the same rules in Manchester and much less busy areas of GM." (Public, aged 18-34, PHV)

"Yes, as I mention earlier everyone should drive electric car that's how we can achieve our clean air goal." (Business, PHV)

Friends of the Earth stated:

"Whilst we welcome the plans for a CAZ in Greater Manchester, we do not accept that the current plans will bring air pollution within legal limits rapidly enough. They therefore not only breach national guidelines, but also subject the population to severe health implications for longer than necessary. We urge you to go further and to implement a CAZ D, i.e. one that includes restrictions on private cars." (Organisation, Friends of the Earth)

Implement the proposals as soon as possible (public n=797; business n=8; representatives n=5): Respondents in their comments stated the implementation of the proposals should be as soon as possible as pollution needs to be reduced to improve public health:

"The timeline for this seems broad given how regularly the UK has missed emissions targets in the past. Change is never easy, but the evidence of the long term damage done to people's health by this sort of pollution necessitates that we act quickly." (Public, aged 18-34, No Vehicle)

"It does really need to be classed as very important and implemented as soon as possible for the sake of people's health and the health of the planet." (Public, aged 55+, No Owned Vehicle)

"Needs to be implemented more quickly. We already have significant health problems and disease caused by dirty air." (Public, aged 55+, Private Car)

"Under these plans, the CAZ won't be up and running until Spring 2022, polluting vans and coaches would remain exempt until 2023 and compliance with legal limits of pollution is not expected until 2024. This is unacceptable, every day that passes is a missed opportunity to protect people's health." (Organisation, Asthma UK and British Lung Foundation)

Air quality is still an issue in respect of other pollutants (public n=40; business n=6; representatives n=3): Respondents commented the Clean Air Plan alone won't clean the air, as there are other important pollutants that affect air quality:

"Allow regional airports to take aircraft away from Manchester, this would reduce air pollution and decrease the amount of vehicle usage around this pollution hub." (Business LGV)

"Stop people using these wood burning stoves would be a good idea." (Public, aged 35-54, LGV)

8.4.2 Opposing the proposals

Comments opposing the proposals included:

	General Public	Business	Represent-atives	Own impacted vehicle	No impacted vehicle
Oppose the proposals	651	223	14	360	515
Proposals are a stealth tax / congestion charge / money-making scheme	607	178	12	279	510
Concern about privately owned vehicles being included in the near future	157	8	4	29	138
There are more important areas to be spending the money on	133	16	1	31	117
Delay the proposals / implement at a later date	118	68	12	83	109
Air quality / pollution is not an issue in GM / proposals not needed	87	58	4	73	76
Should be a vote on the proposals	39	10	0	17	31
Should accept lower standards for vehicles to be compliant	16	23	1	28	11
Base	**1063**	**363**	**30**	**565**	**866**

Almost half of businesses (n=223) and a quarter of the public (n=651) who provided a comment stated they **oppose the proposals**, with many stating the proposals should be 'scrapped' and 'do not agree with charges'. Businesses with vans (n=102) and taxis (n=95) were more likely to oppose the proposals:

> *"These proposals will kill the trade. Drivers cannot afford the cost of implementing these changes. There are plenty of proposals for safeguarding the members of the public but nothing for safety of the drivers." (Business, PHV)*

> *"I don't think it is needed, over a few years the majority of vehicles will naturally meet euro 6 emissions anyway." (Business, LGV)*

> *"There are many aspects of the strategy that are flawed. Charging the people who are the least likely to be able to afford newer cars is inherently wrong. You have to accept that a high percentage of the population that drive older cars do so because they cannot afford newer cars which are more expensive. Also the assumption that you can price someone into compliance is also not correct." (Business, Private Car)*

Members of the public who oppose the proposals did not feel the proposed approach will do enough to improve air quality:

> *"If you would like to lower emissions and keep improved air quality in Greater Manchester, scrap these proposals and focus more on enabling more people to work from home. As we have seen during lockdown this has not only improved air quality but also improved peoples quality of life. By no longer having to engage in timely commutes, be it by private vehicle, train or bus, less emissions are generated." (Public, aged 35-54, LGV, Private Car)*

> *"This is the wrong solution. All stick and no carrot." (Public, No age provided, LGV)*

> *"If you want clean air from using 'clean' vehicles, target the manufacturers to make them affordable instead of handsome profits. Stop targeting people who are just trying to make a living" (Public, aged 35-54, LGV, Private Car)*

> *"Nothing, I would probably breathe in the same amount of polluted air as I do now. It definitely won't reach the high quality standards set by the WHO." (Public, aged 18-34 Private Car, 1588)*

In addition, over a third of businesses (n=178) who commented oppose the proposals with many calling it another form of tax, or a reintroduction of the congestion charge. These comments were mainly received from businesses with vans (n=87) and taxi drivers (n=66):

> *"Do not proceed with charges. I'm of the opinion that this is just another way of generating revenue, another stealth tax. If any charges are implemented I will move my business to an area outside Greater Manchester and will no longer conduct any business within the Greater Manchester area." (Business, LGV)*

> *"As far as I'm aware the air quality is already within legal limits it's a money making exercise that will make millions for the local councils and government, vehicles all come to an end of life new cars are being made and bought on a daily basis cleaner vehicles will replace the old ones without owners being forced in to replacing their vehicles." (Business, Hackney)*

> *"It's just a con the air is cleaner now than it as ever been just trying to make the motorist pay all the money you are spending on this stupid idea should be spent on the badly maintained roads." (Business, Private Car)*

A large number of those without an affected vehicle (n=510) felt the funds to support the proposals will come from additional taxes on the general public:

> *"The likelihood of achieving near net zero emissions within 5-7 years is fantasy. The simple cost and scale is too great to be done in such short time frame. The funding ultimately comes from additional taxes to general public, in most cases I believe people will simply pay the charge and continue to drive non emission compliant vehicles." (Public, aged 35-54, Private Car)*

> *"As stated earlier the whole process is over the top and can only be termed another tax that will affect the whole population with increased costs. Companies etc affected by the tax will just pass on these increases to the public. The amount of roads affected in each borough compared to the total amount of roads is minute less than one percent. Rochdale for example just over 1 km exceeds the proposed limit out if a total road distance of 642,000 kms." (Public, aged 55+, Private Car)*

The Federation of Small Businesses (FSB) felt the proposals will not achieve a reduction in non-compliant vehicles, instead it will only cause an economic downturn as the following extract of the response shows:

> *"The ultimate ambition is to obviously reduce the numbers of non-compliant vehicles and ensure an improvement in overall air quality. This will not be achieved solely by the blunt instrument of a daily charge which many see effectively as a new business tax due to start in just over 12 month's time. This would wash down supply chains, amid what is likely to be a protracted economic downturn, and seems illogical to many in the business community." (Organisation, FSB)*

Delay the proposals (public n=117; business n=68; representatives n=12)**:** respondents stated the implementation of the proposals should be delayed giving people time to upgrade vehicles:

> *"I would comply if given more time or cars deemed safe were affordable. Why should I have to pay hundreds a month to replace a car that is working perfectly fine??? This is WRONG." (Public, aged 35-54, LGV)*

> *"It should be delayed until 2030 when the sale of petrol and diesel vehicles ceases." (Public, aged 55+, Private Car)*

> *"My opinion is that this won't be born overnight these changes will take 5 years to implement and all should be given the time to adapt to the CAZ. Due to the current Covid-19 pandemic i wouldn't like to see any vulnerable business, organisations suffer even more due to this being implemented." (Business, HGV, LGV)*

> *"FSB survey shows 52% of businesses believe the CAZ should be put back beyond 2022 to give those least able to afford to upgrade their fleets longer to comply." (Organisation, FSB)*

> *"The problem is you can't just put things in with a year's notice. We need a long period of notice, because it is a slow moving industry, really. I don't mean like you should say, right, you've got a year to do it, you know, you'd say it's five years or in ten years, you've got to be at this point, because within that ten years or five years, operators would have updated the fleet anyway." (Focus Group: Minibus, Coach)*

Concern about private vehicles included in the proposals: Members of the public (n=157) expressed their concern about private vehicles also being charged in the future with many stating the current proposals are just a step away from congestion charges:

> *"How does the council ensure they will not stop [next step] all cars from accessing the city centre? How do we ensure there will be no congestion charge like London?" (Public, aged 18-34, Other Vehicle)*

8.4.2.1 Suggested amendments

Respondents suggested a number of amendments and other initiatives that could be included in the proposals:

	General Public	Business	Represent-atives	Own impacted vehicle	No impacted vehicle
Should include private cars in the proposals	1003**	76	25	86	349
Other initiatives / measures to improve air quality	469*	37	11	75	255
Restrict / discourage vehicle use	271*	12	10	9	103
Cleaner vehicles / high standards to be compliant	292	21	10	17	126
Better road infrastructure / design / to reduce congestion/improve air quality	222	38	7	63	197
Reduce car use through vehicle sharing/ homeworking policy	222*	7	7	14	42
Pedestrianise / ban cars from the city centre	95	14	3	20	89
Vehicles should be charged / penalised for idling	68	7	5	12	62
Target / charge school runs	59	4	3	16	41
Should be a scrappage scheme for non-compliant vehicles	33	11	13	12	32
Base	**1647**	**171**	**47**	**247**	**917**

The consultation identified two email campaigns (**see section 2.2.2** for details). Comments are marked in the table as follows:

* comments received from the Environmental Bill Lobby email campaign (n=172)

** comments received from both campaigns; Environmental Bill Lobby (n=172) and CAZ support group (n=484); 656 in total.

Include private cars in the proposals (public n=1003; business n=76; representatives n=25): Respondents felt private cars should be included in the proposals in order to improve air quality and also to reduce congestion on the roads:

> *"The Clean Air Zone should also include private cars and motorbikes since they are the most numerous vehicles on the road, skirting around this issue won't change anything at all." (Public, aged 18-34, Private Car)*

> *"I think because private vehicles aren't banned and stuff like that or are not going to be charged, I don't think there'll be a positive. There'll probably be a slight positive effect, but some people will have to give up their vehicles, because they can't do that type of work anymore or whatever, it'll have to change. I think there'll be some effect, but I don't think it'll be the massive effect that they expect or they hope." (Focus Group: Public, aged 18-40,)*

"I believe that air quality is everyone's problem and, as such, cars should also be included in the plans to encourage the use of public transport. This is not just an issue caused by commercial vehicle operators." (Business, LGV, HGV)

Representatives from several organisations felt the proposals did not go far enough:

"We fear that not including private vehicles in the general reflection about clean air and healthier urban zones will lead to failure in meeting the legal requirements for Nitrate Dioxide emissions." (Organisation, Whalley Range Climate Action Group)

"There is a risk that excluding private vehicles from the proposals will lead to an increase in the usage of private vehicles, as opposed to taxis and buses, which may be perceived as more expensive following the introduction of the CAZ. An increase in private vehicle use - to the detriment of shared forms of travel - will have a negative impact on emissions and congestion in the region." (Business, Private Hire Operator)

"Whilst we welcome the plans for a CAZ in Greater Manchester, we do not accept that the current plans will bring air pollution within legal limits rapidly enough. They therefore not only breach national guidelines, but also subject the population to severe health implications for longer than necessary. We urge you to go further and to implement a CAZ D, i.e. one that includes restrictions on private cars." (Organisation, Friends of the Earth)

Need other initiatives (public n=469; business n=37; representatives n=11): Respondents suggested other initiatives to improve air quality, such as stop building on greenbelt or building in general, which will generate more vehicle dependent households:

"1000's of homes even on green belt or town centres going up all the time, cutting down trees won't help and neither will more people on the road... maybe you should target the developers more on all these new homes." (Business, LGV)

"Better to stop building new homes, and plant millions more trees." (Public, aged 55+, Private Car)

"Waste of space, destroying green belt area to build houses and increase traffic then charging for it." (Public, no age provided, Private Car)

"Stop building car parks labelled as 'park and ride' next to people's homes - mass concentration of dangerous atmospheric particulates in one area to save the same levels distributed across a wider area Greenwashing stop Building on greenbelt stop building more roads" (Public, no age provided, No Vehicle)

"plant more tress and make sure public transport tickets charges do not increase" (Public, aged 35-54, Private Car)

Restrict and discourage vehicle usage (public n=271; business n=12; representatives n=10): Restricting vehicle usage in general and banning cars in the city centre were popular responses suggesting those should be pedestrianised and improved with safe cycle lanes:

"We need a huge expansion of measures that discourage car use, pedestrianize more space and massively expand cycling provision." (Public, aged 55+, Private Car)

Need better road infrastructure (public n=222; business n=38; representatives, n=7): Respondents commented on the layout of the current roads and suggest the infrastructure should be improved, which will help reduce congestion:

"Improve roads and stop closing them when it is unnecessary. Give more funds to improve roads to reduce CO2 impact." (Business LGV)

"If traffic was allowed to flow more freely, journey times would be reduced and vehicles would spend less time on the road. Instead all ten local councils are more concerned about slowing traffic down and reducing the size of the roads causing longer journey times, vehicles on the road for much longer and pollution rising". (Business, LGV)

Encourage vehicle sharing / promote homeworking (public n=222; business n=7; representatives n=7): Respondents suggested by encouraging and promoting vehicle sharing not just the air quality will improve, but it will also help reducing congestion in GM:

"I really think Greater Manchester should consider funding a scheme to enable 'shared cars'/'car sharing' for groups of communities. Instead of a road/community of people each having their own car that they all use much less now due to many people working from home, set up a scheme so communities of people can subscribe to all sharing a single car that they can 'book' when they need it." (Public, aged 55+, Private Car)

Vehicles should be charged / penalised for idling (public n=68; business n=7; representatives n=5): Respondents identified idling engines at school drop-off and pick-ups and taxi's and PHVs waiting for their next passengers add unnecessarily to pollution:

"Idling e.g. outside schools is a big contributor from private cars that also needs to be tackled." (Public, aged 35-54, Private Car)

"School Street plans are useful and need the commitment of local Councillors and officers who need to explain to parents that the spike in pollution is down to their car habits." (Public, aged 55+, Private Car)

Scrappage scheme (public n=33; business n=11; representatives n=13): Respondents suggested a scrappage scheme should be introduced for non-compliant vehicles:

"I would rather support a programme similar to the scrappage scheme that would incentive organisations to switch over to cleaner vehicles sooner and just increasing road tax on dirty vehicles." (Business, Private Car)

"It would be better if, as part of the financial assistance package, there is a requirement for the operator to scrap the older, more polluting vehicles rather than cascade them to other jurisdictions." (Organisation, Cheshire East Council)

Need to invest revenue into GM's economy (public n=63): Respondents felt revenue from the charges should be put back into the economy to improve Greater Manchester and the proposal should be promoted and communicated effectively:

"I would like to see some of the funds used to support active travel, electric vehicles, and public transport." (Public, aged 35-54, Private Car)

"There should be a commitment to use the funds raised from the charges to directly benefit local environmental initiatives - greater investment in publicly owned transport etc." (Public, aged 8-34, Private Car)

8.4.3 Sustainable Transport

A number of suggestions were raised about active and sustainable travel:

	General Public	Business	Represent-atives	Own impacted vehicle	No impacted vehicle
Improve public transport	499	40	19	87	455
Promote / encourage more use of buses / public transport	273*	13	11	18	92
Promote / encourage more use of active travel	199*	3	9	2	25
Improve active travel options/infrastructure	137	7	10	15	129
Improve cycling options / infrastructure	122	5	0	11	113
Base	**834**	**52**	**27**	**112**	**604**

The consultation identified two email campaigns (**see section 2.2.2** for details). *comments received from the Environmental Bill Lobby email campaign (n=172)

Respondents provided the following comments in relation to active travel and public transport:

Improve public transport and buses (public n=499; businesses n=40; representatives n=19): Respondents stated buses and public transport in general needs to be improved and **should be promoted to encourage use** (public n=273; businesses n=13; representatives n=11) which will help reduce the number of private vehicles on the road and would improve air quality in GM especially in the city centre:

> *"[We are] concerned about the unintended consequences of this being seen as a penalty on public transport, against our collective aims of creating an attractive, London-style, fully integrated transport system." (Organisation, Liverpool City Regions Combined Authority)*

> *"The Greater Manchester CAZ does not address or support the vital need for modal shift away from private cars. Firstly the scheme should at its core aim to maximise the mode share for bus, through policies that consistently and vigorously support conditions that allow bus operators to provide greater reliability, shorter journey times, and maintain and enhance network coverage and service frequency" (Business, Bus, Coach)*

> *"Public transport needs vast improvement if that was world class you could take most of the cars off the road." (Public, aged 18-35, Leisure LGV, HGV, Private Car)*

> *"Increase public transport capacity so that people have alternative ways of travel once the CAZ comes into effect." (Public, aged under 18, No Vehicle)*

> *"Improved affordable public transport to reduce the number of cars driving into and around the city centre would be a better solution." (Public, aged 35-54, Private Car)*

Respondents in their comments stated an integrated transport system in GM is important. If it's cheap and easy to travel around GM it will encourage more people to move from their private vehicle to more sustainable ways of transport:

> *"One way to reduce air pollution from commercial road vehicles servicing the public is to provide better connections between the arms of the hubs. Too often one has to take*

a bus into a town centre and then another to reach a place that would be a far shorter journey by car. For example to get to Cheadle from Romiley it is necessary to get a bus into Stockport town centre and then another bus out to Cheadle so, if you have access to a car, the journey would be shorter and quicker though if many single drivers with no passengers were so doing (as they certainly are) the air pollution would certainly increase. All proposals need a realistic reappraisal of bus routes." (Public, aged 55+, Private Car)

"I think they need to target the majority, I know I'm going back to what I said, but they need to target the majority, the majority are the people like us, who get the buses day to day. There's far more of us than there is of these hackney cabs and vehicles and they need to put the funding into the public transport, reduce the cost to encourage more people to use it. I'm sure there are like Metro, like the distance that we travel the price per metre is more expensive than the tube and also our public transport in the UK is one of the most expensive in Europe. It's just mad, it is crazy." (Focus Group: Public, aged 18-40)

"Improving public transport is a big thing, you know, making sure that there's more public transport, better quality public transport. You know and just more frequent services and you know, just making sure that the trains aren't as crowded and that kind of thing and unreliable as they sometimes are." (Focus Group: Public aged 40+)

Improve active travel options and infrastructure (public n=137; business n=7; representatives n=10): Respondents stated active travel options and infrastructure in general needs to be improved and **should be promoted more to encourage use** (public n=199, representatives n=9). A safe and more attractive active travel infrastructure will help to reduce the number of private vehicles on the road especially in the city centre and will have better health benefits:

"Alongside these proposals better safety and encouragement for cycling and walking is needed." (Public, aged 35-54, Private Car)

"My belief is that people should be encouraged to walk and cycle more, but the roads are dangerous and really only cater to motorists. With pedestrians being the least important of them all! All side roads should have a speed limit of 20mph (there really is no need to go any quicker) and this should be strictly enforced. We should look towards influence from places like the Netherlands and Belgium where bicycles are king and the roads and road users respect and work around them." (Public, aged 35-54, LGV)

"More activity required around active travel and promotion of 15-minute neighbourhood. Need to change priority away from cars." (Public, aged 55+, Private Car)

Respondents stated that by improving public transport to make it affordable and reliable as well as active travel options this would encourage people to use sustainable travel modes and help reduce travel in private cars.

8.5 Impact of the proposals

Respondents were asked to detail any likely impact of the Clean Air Zone and support offered on them / their businesses / their organisations.

The table below shows the main comments made by each type of respondent. Over half of members of the public and three quarters of businesses commented on the potential impacts of the CAZ. Responses were polarised with members of the public giving positive and negative comments. Businesses highlighted mainly negative impacts.

Table 8-3 Impact of the proposals

	General Public	Business	Representatives
Positive Impacts*	1014	76	28
Negative Impact to Greater Manchester	1089	281	50
Negative Impact to Business	475	483	44
Negative Impact to Public	474	142	14
Negative impact to the environment	592	82	20
Miscellaneous	71	33	4
Base	**2730**	**597**	**85**
Proportion of all respondents (%)	59	76	68

*The consultation identified two email campaigns (**see section 2.2.2** for details). These comments were provided in the Environmental Bill Lobby email campaign (n=172).

8.5.1 Positive Impacts

Positive comments were centred around the impact to air quality and were made by those that won't be personally negatively impacted i.e. they do not have a non-compliant vehicle.

	General Public	Business	Represent-atives	Own impacted vehicle	No impacted vehicle
Support the proposals and efforts to improve air pollution	657*	22	18	29	494
No or small impact	397	51	11	29	428
Will need to replace vehicle/s and am prepared to do this	11	8	2	8	11
Will improve / encourage active travel / public transport use	7	0	0	0	7
Base	1014	76	28	64	878

*The consultation identified two email campaigns (**see section 2.2.2** for details). These comments were provided in the Environmental Bill Lobby email campaign (n=172).

Will help to improve air quality (public n=657; business n=22; representatives n=18): Respondents, especially members of the public without impacted vehicles (n=470), provided supportive comments on the proposals and its efforts to improve air quality and health:

> *"I would be able to breathe better and hopefully avoid the long-term effects of air pollution in my health." (Public, aged 35-54, No Vehicle)*

> *"It could make walking along the road to and from local shops, waiting at the bus stop or walking for leisure smell less bad and be safer." (Public, aged 18-34, No Vehicle)*

> *"I personally developed adult asthma so clean air will benefit me greatly as it will every other living organism on our planet." (Public, aged 55+, Private Car)*

> *"Less air pollution for the families and children at our school. Reduction in lung conditions." (Organisation, Anonymous)*

"We are anticipating the Clean Air Zone having a positive impact on our organisation and assist our work." (Organisation, The Northern Care Alliance NHS Group)

Some, particularly in the focus groups stated that although the proposal will impact them financially, they were happy to upgrade their vehicles for the greater good.

"I have to agree, yeah, you are right, of course it's our responsibility to be introduced, because it's a good impact. It will bite us financially and impact on the businesses, but in the long run, you know, for the environment we should leave this planet safer for the new generation, so yes, this is our responsibility, you're right." (Focus Group: LGV)

8.5.2 Negative Impact to Greater Manchester

Half of the comments from the public and businesses expressed concern about the impact to business across GM and the potential knock on effects on the public:

	General Public	Business	Represent-atives	Own impacted vehicle	No impacted vehicle
Concern about goods / services / fares increasing in price for people	741	92	27	164	671
Will negatively impact businesses / economy in Greater Manchester	529	189	31	335	390
Will cause me / my business to relocate to outside of Greater Manchester	62	25	1	50	36
Will increase my business prices to cover costs / charges	20	61	5	62	16
Will reduce travel to Greater Manchester / people will avoid the region	68	8	6	34	39
Base	**1089**	**281**	**50**	**484**	**894**

Will increase cost of goods / fares / services (public n=741; business n=92; representatives n=27): Responses to this question stated that they were concerned the charges would be passed on to the consumer through increased bus fares, delivery charges and taxi fares:

"Higher charges for buses, taxis, goods in shops will all be passed on to the consumers." (Public, aged 35-54, Private Car)

"If I had to carry out my business when this tax is in place, I would pass the cost on to the already suffering businesses, in turn they would pass it on to the shoppers. This is the reason online shopping is growing so fast and towns and city centre businesses are going bankrupt." (Business, Private Car)

This was also raised in the focus groups:

"People are going to have to pay more. I mean I couldn't possibly run my company now buying all these vehicles at the same price as last year. Costs have got to go up because of these vehicles, so I am obviously going to be dearer than all the rest of the guys on here, that's the way it is, so the costs have got to go up." (Focus Group: Minibus, Coach)

Negative impact on GM based businesses (public n=528; businesses n=189; representatives n=31): Respondents, especially businesses with vans (n=88) and taxis (n=72), felt the proposal would have a negative impact on Greater Manchester's economy as people and businesses will avoid the area and trade or shop elsewhere:

> *"Traders will be discouraged from coming to GM and the economy will decline, resulting in financial problems for local authorities and a more depressed environment. Also, higher costs due to surcharges for deliveries." (Public, aged 55+, Private Car)*

> *"This will hurt the local economy. So I expect to see prices for goods and services creeping up as the costs get passed on to consumers. Taxi fares will go up, businesses will incur extra costs transporting goods so prices will go up, local man-and-van trades will incur extra costs so their rates will have to go up. For an economy already on its knees from Covid, how can this be a sensible idea?" (Public, aged 55+, Private Car)*

> *"It would crucify business in the region. It is not an idea conceived in the round. The economic impacts would be equal or more than Covid." (Business, LGV)*

> *"Could be detrimental to leisure organizations and could cause extra costs to members of social clubs. If they cannot afford the extra costs could also be detrimental to states of mind if people cannot afford to attend events" (Public, aged 35-54 Private Car)*

> *"I can see many of the smaller businesses struggling with the extra costs. At a time when we should be helping small businesses this additional cost is the last thing they need." (Public, aged 35-54, Private Car)*

> *"It will decimate the GM hackney trade. What will disable people do for transport then? What about elderly people?" (Business, Hackney)*

> *"Any additional cost to a business will have an impact. We supply pubs and restaurants with drinks and enter Manchester City centre on a daily basis This will have a huge impact on the business overheads" (Business, LGV)*

Reduce travel in to and around GM: (public n=68; businesses n=8; representatives n=6): Respondents commented the proposal would reduce those travelling into Greater Manchester, which would have a negative effect on local businesses:

> *"I would say that they need to look strongly at charging cars and not charging taxis. I would say that from my point of view it will be taking people away from Manchester, the Christmas markets and the school trips and the shopping trips will be going elsewhere, rather than paying this additional charge and not for one moment would it make me consider signing up to the finance on the Euro 6 coach, not for a moment." (Focus Group: Minibus, Coach)*

> *"Less travel into Manchester as all transport would increase fairs to help pay charge. Less transport available as not all will afford the charge and give up. Less self-employed delivery drivers. The country is already going green. There is no need for this" (Public, aged 35-54, Private Car)*

> *"Ah, from an equine industry point of view it's going to stop people coming in to Grater Manchester to use our equine facilities which is going to have a massive effect on that industry, you know, along with industries people investing. You know, we want people to invest in Greater Manchester." (Focus Group: Public HGV owners)*

Will cause me / my business to relocate to outside of Greater Manchester (public n=62; businesses n=25): Some suggested the proposals could lead them to relocate their business outside of Greater Manchester. The main reason appeared to be based on how the charges would increase their running costs:

"Do not proceed with charges. I'm of the opinion that this is just another way of generating revenue, another stealth tax. If any charges are implemented, I will move my business to an area outside Greater Manchester and will no longer conduct any business within the Greater Manchester area." (Business, LGV)

8.5.3 Negative Impact to Business

Most of the comments from businesses expressed concern about the negative impacts the proposals will have on them including:

	General Public	Business	Represent-atives	Own impacted vehicle	No impacted vehicle
Will negatively impact my business / operations / performance	137	284	17	323	109
Cannot afford to upgrade my vehicle/s	190	203	14	287	115
Will cause business to close / lose my job	126	209	14	243	95
Will devalue my vehicle/s/will have to sell vehicle/s	61	33	4	78	16
Will have a negative impact on me / my business / organisation	35	52	3	55	33
Will need to replace vehicle/s	22	33	2	46	10
Concerned the price of compliant vehicles will increase	21	32	4	33	19
Will have a large / significant impact on me / my business / organisation	24	23	0	34	12
Unfair to those who bought a vehicle/s / not yet due for upgrade	10	24	4	23	14
Unfair to those located just outside of GM who don't qualify for funding	6	5	3	8	4
Base	**475**	**483**	**44**	**644**	**330**

Negative impact on businesses in general (public n=137; business n=284; representatives n=17): Respondents commented on how negatively the proposals will impact on their business operation. Taxis and businesses state Covid-19 has reduced trade and the additional charges will negatively affect businesses further:

"I run a small company with around 15 regular drivers dealing entirely with airport and home to school transfers as our core business…The business is entirely dependent on two income streams, one of which (airport transfers) has since completely collapsed since the beginning of the Covid-19 crisis in March…The success of the business relies on the goodwill of our drivers and their ability to earn a decent income. Without them I might as well close now. If I can navigate through the Covid crisis successfully these next few months and encourage my team to see the advantages of applying to the

Clean Air Taxi Fund, I believe we will get through it. Failure in either of those aspects may well prove to be one step too far." (Business, PHV Operator)

"I feel that this will be an additional burden that we could well do without at the moment. We have been impacted by CV19 and have had to take on finance to help us out of this situation We don't need any more debt for a new vehicle as well" (Business LGV)

"Extra costs will be incurred due to delivery and collection companies from inside and outside the area increasing their costs, this will probably mean a loss of business as most of our competitors/customers are outside the GM border and we cannot increase charges just because of where we are based, which could lead to our eventual closure as we work on very tight margins." (Business, LGV)

Can't afford to upgrade vehicle (public n=190; business n=203; representatives n=14): Many respondents, especially businesses with vans (n=86) and taxis (n=101), who answered the question felt they could not afford to upgrade their vehicle to be compliant:

"The proposed support would not provide enough help to upgrade my vehicle which means added difficulties to already struggling trade." (Business PHV)

"The impact would be that I would not be able to afford to buy a brand-new vehicle on finance and I don't have the cash to buy one either." (Business LGV)

In the Focus Groups respondents went into more detail about how difficult it would be for them to upgrade now:

"I think the big issue is the industry has got no money. We've all had nine months, pretty much twelve months without earning any money. Nobody's going to have the money to invest in vehicles next year. Nobody's investing this year, so everybody's a year behind where they were. There's not going to be the money next year, because we're not going to be as busy." (Focus Group: Minibus, Coach)

"The thing to consider also is with the current Covid situation, everyone's credit ratings will be getting downgraded anyway, because of, you know, there's a lot of hesitancy out there for people to lend, isn't there, at the moment. So, even if you know, twelve months, two years, you could have got the credit, maybe you might be downgraded 10% or something, you know, 50%, you don't know until you need it. But a lot of companies won't be in the same position now than they were twelve months ago." (Focus Group: HGV)

"We're the same, it'll put us out of business. Hundreds of children are going to be without transport and then your big boys like Stagecoach'll charge an absolute fortune because they'll be the only ones with the vehicles. Where does this money come from? You know what I mean." (Focus Group: Minibus, Coach)

Business closures (public n=126; business n=209; representatives n=14): Many respondents, especially businesses with vans (n=104) and taxis (n=79), expressed their concerns the proposed charges will cause their business to close since it will not be financially profitable to continue to operate:

"This charge will undoubtedly force operators out of our industry and place a greater financial burden on the ones not eligible for funds to change. The potential knock on effect to our company and the industry in general is significant. This could be that we lose the ability to deliver the volumes required by our customers and so lose contracts and our business suffers. Or that we will be faced with becoming an operator ourselves and having to finance wagons, find drivers and a site where they can park and operate from. Or that we try to encourage the existing hauliers that work for us to renew their vehicles with our financial support. All of the above options present a huge financial commitment and a threat to our business. Our hauliers live outside the area and cannot

currently apply for funding. We cannot currently apply for funding as we do not operate any vehicles. The charge is too high at £60 per day for an HGV - this equates to £18,000 per vehicle per year, which businesses cannot absorb and is simply not recoverable from the customer/client receiving the goods. Our HGV operators rely on us for works, as we rely on them to deliver our products - if a proportion of them disappear as we currently anticipate, it will have a serious effect on our business and the industry in general." (Business, Private Car)

"Covid-19 has affected all our businesses with the restrictions, and many businesses in our industry will not re-open, I don't think. Reduced turnover, and the changes in the working world because of Covid-19 and businesses we supply to not operating etc. It is a real struggle and will be for a while yet. I'm not sure if we will survive it." (Focus Group: LGV)

"Could be too expensive for us to continue as a small family business" (Business, Leisure LGV, HGV)

"As none of our specialist recovery vehicle are compliant, and we do not have the funds to replace them. We believe the business would close and jobs will be lost" (Business, LGV, HGV)

"I feel that my husband would be forced to retire even though he doesn't want to, and can't really afford to. The grant is not going to cover the cost of replacing the van we can't do without, so we will be forced out of the market." (Business, LGV)

8.5.4 Negative Impact to Public

Some concerns were raised about the potential negative impact to the public:

	General Public	Business	Represent-atives	Own impacted vehicle	No impacted vehicle
Will add costs / impact use of personal leisure vehicle/s / hobbies / clubs	306	7	10	274	32
Will impact me financially / add more costs to my life / activities	241	78	2	229	92
Will have a significant / detrimental impact on me financially	47	65	1	89	21
Will negatively impact mental health / wellbeing (e.g. stress)	52	10	7	47	17
Base	**474**	**142**	**14**	**465**	**144**

Impact on personal leisure vehicle (public n=306; business n=7; representatives n=10): Respondents who responded to the question stated the proposals would negatively impact the use of personal leisure vehicles. The most common type of leisure vehicle were horse boxes and motorhomes:

"I have a motorhome that I use to holiday in the UK helping the local economy and I would be penalised for doing so. You are adversely affecting the tourist industry as well as the businesses of self-employed friends and acquaintances." (Public, aged 55+, Private Car)

"Devastating. We do horse transport and also transport our own horses to various events. We will have to charge customers more when transporting to shows (which bolster the local economy) and then when we want to use the vehicle privately, we will also be charged." (Business, LGV)

Additional cost to leisure / hobbies (public n=241; business n=78; representatives n=2): Many equestrians and motorhome owners felt it would have a significant impact on their hobbies and could lead to issues with animal welfare:

"I feel that I would be [un]fairly out of pocket and would suffer with not being able to get out and about on my horse. I would also feel more at danger from having to spend more time on the roads where people do not have respect for horse rider's safety." (Public, aged 35-54, LGV Leisure)

Severe financial impact (public n=47; business n=65; representatives n=1): Many expressed their concern this would affect those already on low incomes or encourage people to drive in their own cars:

"It could impact my ability to go to work or have a significant impact on my finances. I have to pay for taxis into work. If I have to pay extra for a clean air zone fee (because the taxi firms will pass on this charge) this will make the journey much more expensive. Rich able bodied people, with modern fancy cars, will ignore the zone and pay the charges because it won't be much money for them. Poorer people with older cars, and disabled people relying on taxis, will be disproportionately affected, as usual." (Public, aged 35-54, Private Car)

"It costs money to run a diesel van. Insurance, tax, fuel, repairs. An electric van would have no fuel costs but would add to our electricity bill, a cost that is currently unknowable, and there are very few garages in our area currently that know how to repair electric vehicles, should something go wrong. Our Clean Air Zone charges could be an additional £1600/year (it currently costs us over £700 simply to insure our van)" (Business LGV)

"My vehicle is a mid-September 2015 registration but is Euro 5b not 6 as I thought. The daily CAZ charge would take a quarter if not more of my wage. I own a specially adapted WAV private hire minibus and it would seriously impact my finances which have fallen drastically due to Covid-19" (Business, PHV)

Impact on mental health (public n=52; business n=10; representatives n=7): respondents who answered the question identified a negative impact on their mental health. It is important to address the additional pressure Covid-19 has created:

"Reduced state of mental health. Reduced leisure activities. Reduced family income husband is self-employed roofer. Reduced standard of living" (Public (55+) Leisure HGV, LGV)

"There would be a significant impact on the shows and events I attend with my heritage vehicle, making my hobby unaffordable, reducing my social interaction, which in turn could have an adverse effect on my health and wellbeing. The area in which I live has a significant equestrian community that supports the local economy and these proposals could have an adverse effect. For the clean air initiative to be effective I feel you need to target the vehicles that are causing the problem - I believe this to be none compliant cars that undertake short journeys and carry no passengers." (Public, aged 55+, Private Car)

8.5.5 Negative impact to the environment

Concerns were raised about the potential negative impact the proposals will have on the environment:

	General Public	Business	Represent-atives	Own impacted vehicle	No impacted vehicle
Won't improve air pollution / quality	514*	70	17	123	294
Will cause more congestion / encourage more private car use	93	13	3	23	82
Concerned about impact on bus / public transport routes / frequency	28	8	3	7	23
Base	**592**	**82**	**20**	**145**	**358**

*The consultation identified two email campaigns (**see section 2.2.2** for details). These comments were provided in the Environmental Bill Lobby email campaign (n=172).

Won't improve air quality (public n=514; business n=70; representatives n=17): Respondents expressed their concern the proposals would not improve air quality. Many stated the exclusion of private vehicle use to the proposals will create the same level of pollution. The aim should be to reduce the number of cars using the roads and improve public transport to provide people with an acceptable alternative:

> *"The proposals will have little effect on congestion perhaps replacing one vehicle with a less polluting one. The demand is currently personal car use particularly in the face of Covid, the real benefits would come from reducing car use. For me it is impossible to say how long a journey on the roads will take and train services have been substandard." (Public, aged 35-54, Private Car)*

> *"The impact on my health, as a resident of Manchester who lives off Wilmslow Road, would be unfortunately negligible given the refusal to include private cars. SUVs circle the local private schools, as wealthy parents pick up and drop off their children. This will continue, untouched, by the current plans." (Public, aged 18-34, No Vehicle)*

> *"I have little confidence the proposals in their current form will have a positive effect. The scheme is unambitious, the charges are too low, money generated is being spent in the wrong places and the most polluting activity (people using their car to make short journeys when there are alternatives available - walking and cycling) are not being tackled." (Public, aged 35-54, Private Car)*

> *"I work in the health sector. I am very keen to get air pollution down, and increase active travel. I am sorry, but I am not convinced that you will get the air pollution down without including private cars." (Public, aged 55+, Private Car)*

Both email campaigns commented that whilst the proposals are a good step towards reducing the impact of bad air quality, they do not go far enough and will not have a significant positive impact, particularly on vulnerable groups:

> *"Targeted action to reduce pollution outside schools, hospitals, and care homes to protect those most at risk. Much more detail is needed on how those who are most at risk will be protected from all types of pollution." (Environmental Bill Lobby Campaign email)*

> *"In 2018, the High Court ruled that air pollution in the UK be reduced to below legal limits within the shortest time possible. The proposed plan expects to reach legal compliance by 2024 - so a child born in 2018 will be seven before they can breathe 'legally safe' air. But legal air pollution limits are not the same as safe health limits and research has shown that air pollution - particularly ultrafine particulates - causes lifelong damage to children." (CAZ support group)*

This was also raised in the Focus Groups:

> *"In my opinion I don't think it'll change anything, as long as you're allowing private cars in and stuff I don't think it'll change anything." (Focus Group: Public, aged 18-40)*

> *"I am a green operator which costs me a lot of money and a lot of work. This is just one thing that will encourage more people to use the car. So, if you've got a minibus carrying 15 children, that would be 15 more cars on the road because if that minibus isn't there. So, what's that doing to congestion." (Focus Group: Minibus, Coach)*

More private car use (public n=93; business n=13; representatives n=3): Respondents suggested in their comments that these proposals will increase fares and services, which could increase private vehicle usage since that will be a better and cheaper alternative. They suggested this would lead to more congestions on the roads:

> *"Less likely to travel by public transport as personal car use would become more financially affordable. Less likely to travel into the city." (Public, aged 18-34, Private Car)*

9. Equality Impact Assessment

9.1 The EQIA

Under equality legislation, there is a requirement to have due regard for the need to:

- Eliminate unlawful discrimination, harassment and victimisation;
- Advance equality of opportunity between persons who share a relevant protected characteristic, and persons who do not share it; and
- Foster good relations between those who have a relevant protected characteristic and those who don't.

Relevant protected characteristics are age; disability; gender reassignment; pregnancy and maternity; race; religion or belief; sex and sexual orientation.

The draft analysis of potential impacts of the Clean Air Plan proposals is set out in the document "Equality Impact Analysis" which is part of the suite of documents available to consultees.

Respondents were directed to review the assessment and asked if they had any comments. Very few comments were received as most respondents did not feel equipped to comment. The responses received to this question are described below in Overall Response.

The perceived impacts of the CAZ have been discussed in the previous chapter and these responses have been further analysed by protected characteristics including age, gender, ethnic origin and limiting long term illness in order to establish if any impacts were mentioned more by one group than another and these are described in Difference in Impact by Demographics

9.2 Overall Response

Very few respondents gave a comment about the Equality Impact Assessment; just 9% of the public and 8% of businesses. A fifth of representatives provided a comment.

Table 9-1 Comments about the Equality Impact Assessment

	General Public	Business	Representatives
Support	51	7	7
Oppose	82	16	2
Age and gender	46	9	3
Ethnicity	13	8	2
Health and disability	72	15	9
Financial	122	23	9
Miscellaneous	34	6	0
Base	**346**	**65**	**24**
Proportion of all respondents (%)	9	8	20

9.2.1 Summary of the EQIA

Relatively few comments were received about the EQIA and many comments highlighted that most providing a comment had not read the accompanying EQIA document and had a lack of understanding of its purpose:

> *"Everybody should be treated equally, why do we have to highlight those that are different thereby making them stand out from the crowd and encouraging discrimination. Having said that you should ensure that the scheme meets the needs of all sections of society." (Public, aged 55+, Private Car)*

However, those that did read the documentation gave positive comments:

> *"The impact assessment thoroughly addresses equality issues and highlights groups who will particularly benefit from clean air. It provides further evidence of the importance of the clean air proposals being adopted." (Public, aged 35-54, No Vehicle)*

> *"It seems very thorough and accurate." (Business, LGV)*

The main comments received included:

Finance and Income: although not to be considered a protected characteristic, finance and income were identified as being a key consideration to the proposal. Respondents (public n=120; business n=23; representatives n=8) felt the proposals would have a greater negative impact on those from poorer / lower income households:

> *"Equality Impact Assessments should also consider socio economic inequality, i.e. the impact on people on low incomes. I know this is not a legal requirement as it's not a protected characteristic, but it should be, and GM could decide for itself to include such a consideration in future equality impact assessments, e.g. through the introduction of a "socio-economic duty".(Public, 35-54, No Vehicle)*

> *"Careful not to price poorer people off the road, we need transport options too" (Public aged 35-54, Private Car)*

> *"Any economic equality impact should [be] addressed and at the same time will hopefully be more than balanced out by the health improvements as those in poverty are more likely to be exposed to low air quality and the associated health risks, and impacts on education and employment." (Public, aged 35-54, Private Car)*

> *"working peoples incomes will suffer. costs of living for local services will rise. not a good idea." (Organisation, Anonymous)*

> *"The clean air proposals contribute to the division of rich business and those who are not doing as well or fresh startups meaning that it is in itself unequal and promotes inequality." (Business, LGV)*

Health and disability issues: Almost a fifth of members of the public raised concerns for those with disabilities or long-term health issues, in particular those related to respiratory health concerns (public n=177):

> *"In terms of disability, it is important that people who rely on cars are due disability are not penalised. Also, people with long term medical conditions are adversely affected by air pollution. I feel very stressed about the air quality due to the very significant reduction in life expectancy for me due to my heart transplant; life expectancy is reduced by 25% in very highly polluted areas…" (Public, aged 35-54, No Vehicle)*

Friends of the Earth made several points about health and social impact, including:

"Poorer households without cars are less likely to create air pollution but suffer disproportionately from the air pollution and poor quality environments created by other peoples' vehicles." (Organisation, Friends of the Earth)

"Some of the most vulnerable in our society are hit hardest by bad air – the elderly, the young and the most disadvantaged (who are more likely to live near main roads where pollution is worst). People in vehicles can be exposed to worse air than those walking or cycling the same route" (Organisation, Friends of the Earth)

Ethnic Origin (public n=8, Taxi n=6): There was also concern that highlighted the proposal will have a negative impact on those from ethnic minority groups:

"Lot of private hire drivers are from BAME backgrounds so any acts should not disproportionately affect this group." (Public, aged 18-34, Private Car)

9.2.2 Difference in Impact by Demographics

There were very few differences in the comments received by members of the public. Small differences in responses given included:

- **Over 55s:** were more concerned the proposal will result in a rise in the cost of goods, services and fares (n=297);
- **Men:** were more concerned the proposal will result in a rise in the cost of goods, services and fares (n=349); and
- **Women:** were concerned about the increased cost to use their personal leisure vehicles (n=189).

10. Comments on the consultation

Throughout the questionnaire, respondents provided comments on the consultation process and materials, as well as making comparisons between the proposals and other cities and countries inside and outside of the UK. The below table shows that comments on the consultation were provided by just over half (51%) of all business respondents, almost a third (32%) of representatives, and just over a fifth (21%) of the general public.

10.1.1.1 Comments on the Consultation

	General Public	Business	Representatives
Comparison made to another city or country in the UK	169	75	17
Comparison made to another city or country in Europe	26	2	2
Comparison made to another city or country elsewhere	16	5	1
Criticism of TfGM or Council or Mayor or Government	508	133	19
Comments on the survey / consultation materials	200	64	13
Comments about Minimum Licensing Standards	44	15	4
Base	**797**	**224**	**39**

Criticism of TfGM or Council or Mayor or Government (public n=508; business n=133; representatives n=19): These comments constituted the majority of additional comments about the consultation, with 13% of the general public, 30% of business respondents, and 15% of representatives providing comments criticising TfGM, the Council, Mayor or wider government in relation to the CAP proposals. Many of the comments provided criticism while expressing how they felt the proposals were unfair, poorly timed, and they were designed to make money for councils and local government while causing unemployment and hardship for those affected:

> *"It should not even be being considered. Yet another example of democracy being sidestepped and is obviously just a money-making exercise. Legislation is already in place to phase out petrol/diesel cars, but the Government/Councils cannot wait to get their hands-on easy money. Bear in mind every increase in business costs passed on to consumers equates to a rise in VAT revenue. This just amounts to another tax on motorists alongside road tax, fuel duty, insurance tax… It will adversely affect hundreds, if not thousands. of people/businesses. It will lead to price rises at a time when the population can least afford it due to Covid-19 and Brexit, and the subsequent rise in unemployment. If I remember rightly, this is being implemented in Manchester by a Mayor the electorate voted not to have." (Public, aged 55+, LGV)*

> *"GMC has created this problem deliberately. The plan is insane if you want businesses to survive. Do not forget, you only receive council tax etc. from businesses because they can operate within the area. If you squeeze them out, then your revenue will stop. You have already systematically narrowed, closed, and redesigned roads in and around Manchester to create and enhance the congestion and emission problem. Open up the roads to prevent all the standing traffic you have created. This would help both businesses and the environment more. If you do not, then we will definitely relocate our business outside the GMC area, and many jobs will be lost as a result. I/we believe that many other businesses will follow suit. This will mean that you will eventually create a comparative wasteland of a city, and your revenue will drop. Hence why this pan of yours is insane." (Business, Private Car)*

Some respondents expressed their scepticism about the consultation process, feeling the views of those affected will not be taken into consideration and the proposals will not change as a result of this process. A number of respondents felt those affected were being unfairly targeted under "false green credentials", and some felt the higher levels of congestion and air pollution were a direct result of poor planning and transport infrastructure changes:

> *"You know very well that this is not a proposal. You are going to do this regardless of what anybody says. Greater Manchester Council have never made it a secret that they hate motorists despite the fact a city without car access dies fairly quickly. I think this is nothing more than a money-making scam where, once again, drivers are crucified under false green credentials." (Business, Private Car)*

Comments on the survey / consultation materials (public n=200; business n=64; representatives n=13): Some respondents felt the survey and / or consultation document was too long and detailed, believing this would deter people from completing the survey. These respondents expressed concerns the responses to the survey may misrepresent the impact of the proposals:

> *"The document is so long that it will discourage people from completing it which will give a false impression that people accept it. This can be measured by the number of incomplete submissions. Will you be declaring that number?" (Public, aged 35-54, LGV)*

Although some felt the consultation document was too detailed, others felt the consultation materials lacked evidence and data regarding the impact of vehicles on pollution levels, with some feeling the materials presented a "misleading" image of vehicle emissions:

> *"It is difficult to comment on the effect on pollution levels and how the proposal may improve matters given that the consultation document contains little or no data on the subject." (Public, aged 35-54, LGV, Private Car)*

> *"We have to record our shock at seeing rather negative and misleading imagery used in the Consultation video, displaying cars as being apparently clean, but buses and coaches (as well as taxis and HGVs) shown as emitting smoke. We appreciate this is to amplify the point of vehicles included in the CAZ, but this is an untrue image and highly misleading and can cause negative reinforced perceptions from the public." (Organisation, CPT)*

Comparison made to another city or country in the UK (public n=169; business n=75; representatives n=17): Most of these comments made comparisons between the CAP proposals in Greater Manchester and the Clean Air Zones proposed in Leeds and Birmingham or making comparisons to London's existing Ultra Low Emissions Zone (ULEZ). Many who commented about other Clean Air Zones planned across England reflected on how some councils had decided to postpone or cancel their Clean Air Zones due to the impact of Covid-19. Respondents believed these decisions had been made due to the impact of Covid-19 on the economy and the feasibility for businesses to upgrade their non-compliant vehicles, as well as the impact of Covid-19 on traffic and pollution levels. These respondents questioned whether a Clean Air Zone was still required or whether roadside nitrogen dioxide levels were now within legal limits across Greater Manchester:

> *"The pain this will cause to business and jobs is undeniable. As per the Leeds CAZ, which has now been cancelled with a waste of millions of pounds! Newer/cleaner vehicles are coming into service all the time, which will bring the clean air down to the required levels. The natural vehicle replacement cycle is the solution." (Business, LGV, HGV)*

> *"We believe that TfGM and all authorities within the region must continue to take into account the following: A number of other cities across England have since cancelled introducing a Clean Air Zone as the resulting drop in traffic and emissions has brought*

the area to within legal limits. We would welcome clarification as to whether there has been any significant change in air quality levels within the Greater Manchester area and whether this model of CAZ is necessarily still required?" (Business, LGV, HGV)

Some respondents made comparisons to London's ULEZ, sharing how they felt it had not helped to reduce congestion and emission levels there and feeling it would not make a difference in Greater Manchester either. Instead, these respondents felt other initiatives or aspects should be focused on to improve air quality and discourage private car use, and improving public transport and making it more reliable, affordable, and accessible:

"London have the congestion charge, but it is still busy, still congested, still heavily polluted, so no, it will not help with clean air. Change the public transport making it reliable, affordable and easy to use." (Public, aged 35-54, No Vehicle)

"Penalising people hasn't worked in London so why would it work here? We need real initiatives not just ways of making money whilst not addressing the problem." (Public, aged 35-54, LGV)

In contrast to those who made comparisons to London's ULEZ but felt it was ineffective in reducing traffic and air pollution levels, other respondents felt Greater Manchester's CAP proposals needed to go further to more closely resemble London's ULEZ. These respondents discussed how they felt the proposed charges, affected vehicle types, and restrictions needed to go further in order to successfully reduce air pollution in the region:

"It seems like in London an Ultra Low Emissions Zone was needed to tackle air pollution, which is why I said I was unconfident that these proposals will deal with air pollution. I hope that there will be robust monitoring and that changes will go further if it is needed to address climate change and the current public health problems caused by air pollution and overuse of personal vehicles." (Public, aged 18-34, Private Car)

"The proposed levels for HGVs and coaches are significantly less than that charged in the London ULEZ. The proposed charging rate is not a motivator for owners to upgrade vehicles. As for Taxis/PHVs, the daily charge level is about the level of a single fare and is nowhere near enough to drive change in vehicles." (Public, aged 35-54, Private Car)

Appendix A Methodology

Appendix A details the full methodology for the consultation. The questionnaire was designed by TfGM on behalf of the 10 GM Local Authorities, with input and approval from the LAs. The following stages were then completed:

- Testing the questionnaire for clarity and understanding;
- Scripting the questionnaire;
- Data analysis; and
- Coding responses;

Questionnaire Design

With any research, it is important to test and ensure the methodology and questionnaire are fit for purpose and ultimately provide the outputs required to fulfil the research objectives and questions. A large proportion of this questionnaire was cognitively tested and live tested during the Clean Air Plan "Conversation", a public engagement exercise was undertaken prior to this consultation. Therefore, it was agreed AECOM would complete a minimum of 50 pilot interviews of the survey.

Pilot Testing

To ensure the survey was tested, the questionnaire was sent to a mix of respondents with 34 members of the public, 21 taxi / PHV companies / drivers and 131 businesses. Recruitment was undertaken by AECOM's in-house recruitment team.

A unique web link was emailed to everyone who was recruited to ensure the questionnaire could only be completed once. 58 respondents completed the questionnaire.

The pilot was used to test the data we obtained from the responses and the length of the questionnaire. The survey took on average 25 minutes to complete with the shortest being 4 minutes and the longest being just over 60 minutes.

For the purpose of the pilot, at the end of the survey we provided an open comment box to receive feedback on the questionnaire. We reviewed these comments against the revised questionnaire to ensure any errors in format were corrected before the final questionnaire was approved for distribution for the live survey.

Scripting the questionnaire

The questionnaire was scripted using Askia survey software. The script was checked to ensure all text matched the paper questionnaire, routing was accurate, and the survey was user-friendly for anyone completing it.

Data analysis

Data was imported from Askia into SPSS (Statistical Package for the Social Sciences).

All paper copies received were reviewed, quality checked before the responses were entered in the online questionnaire.

Data was cleaned by allocating additional codes to identify where respondents had been shown a question but chosen not to give a response and where respondents had been routed past a question, e.g. the general public were not asked about the effect of Covid-19 on their business. Additional variables were created using syntax in preparation for analysis, for example, those who were and were not financially impacted by Covid-19.

Coding responses

For each open-ended question, a process of human coding was completed to develop a number of themes based on the responses provided for each question.

For each question, a code frame was developed to capture the key themes from an initial set of responses and TfGM reviewed each code frame. A team of trained coders worked to code each response in each question and where the potential for new codes emerged, these were added to the code frame in agreement with TfGM. All coding went through two sets of reviewing for full quality assurance by AECOM, before TfGM completed a final quality review.

Late responses

Four online responses, two hard copies and eleven emails were received shortly after the deadline of 3 December 2020 at 23:59 and have not been included in the data. Responses included:

Online:

- **Organisation:** felt cars should be included and thought boundary was too large;
- **Business:** small business, felt charges were high. Funding was low and concerned about welfare of small business vs large;
- **Public - for:** was mainly concerned private cars should not be included rather than commenting on the vehicle types included in the proposals;
- **Public – against** commented about the combined negative effect of the proposal and Covid-19.

Emails:

- **Campaign emails**: Four from the Environmental Bill Lobby and three from the CAZ support group;
- **Organisation:** 1 from an organisation who had already submitted a response in the online questionnaire;
- **Business:** 1 from another business (John Lewis / Waitrose) they agree with the CAP, requests as much time as possible to prepare and proposes a lower daily charge for HGVs;
- **Public:** 1 member of the public who had already emailed as part of a campaign wanted to add some thoughts on the value of elective vehicles compared to petrol and ask people to drive less;
- **Public:** 1 from a horse rider who lives outside Greater Manchester, supports air quality but financial cost to them is high.

Appendix B Data tables

Are you responding to this consultation as a…?

Respondent type

	General Public		Business		Taxi		Representatives	
	N	%	N	%	N	%	N	%
Member of the public	3858	100%	0	0%	0	0%	0	0%
Business (including self-employed and sole traders)	0	0%	441	100%	0	0%	0	0%
Hackney / private hire vehicle - driver / operator	0	0%	0	0%	343	100%	0	0%
Organisation (e.g. schools, charities, social enterprise, trade organisations, government bodies)	0	0%	0	0%	0	0%	81	66%
Councillor / Elected Official	0	0%	0	0%	0	0%	43	34%
Base	**3858**	**100%**	**441**	**100%**	**343**	**100%**	**124**	**100%**

Vehicles owned with a proposed daily charge of £60 to enter or travel in the Clean Air Zone

	Bus		Coach		HGV		HGV Leisure	
	N	%	N	%	N	%	N	%
Member of the public	27	59%	4	15%	35	24%	233	89%
Business (including self-employed and sole traders)	15	33%	13	48%	102	71%	23	9%
Hackney / private hire vehicle - driver / operator	4	9%	9	33%	2	1%	2	1%
Organisation (e.g. schools, charities, social enterprise, trade organisations, government bodies)	0	0%	1	4%	4	3%	4	2%
Councillor / Elected Official	0	0%	0	0%	0	0%	0	0%
Base	**46**	**100%**	**27**	**100%**	**143**	**100%**	**262**	**100%**

Vehicles owned with a proposed daily charge of £10 or below to enter or travel in the Clean Air Zone

	Minibus		Van/LGV		Private Hire Vehicle		Hackney Carriage	
	N	%	N	%	N	%	N	%
Member of the public	17	40%	293	49%	14	7%	2	1%
Business (including self-employed and sole traders)	15	35%	283	47%	13	6%	18	11%
Hackney/private hire vehicle - driver/ operator	4	9%	4	1%	172	86%	142	86%
Organisation (e.g. schools, charities, social enterprise, trade organisations, government bodies)	7	16%	16	3%	2	1%	2	1%
Councillor/elected official	0	0%	2	0%	0	0%	1	1%
Base	**43**	**100%**	**598**	**100%**	**201**	**100%**	**165**	**100%**

Are you authorised to respond on behalf of this organisation?

Respondent type

	General Public		Business		Taxi		Representatives	
	N	%	N	%	N	%	N	%
Yes	0	0%	388	95%	21	100%	58	97%
No	0	0%	22	5%	0	0%	2	3%
Base	**0**	**0%**	**410**	**100%**	**21**	**100%**	**60**	**100%**

Vehicles owned with a proposed daily charge of £60 to enter or travel in the Clean Air Zone

	Bus		Coach		HGV		HGV Leisure	
	N	%	N	%	N	%	N	%
Yes	17	100%	23	100%	105	99%	26	93%
No	0	0%	0	0%	1	1%	2	7%
Base	**17**	**100%**	**23**	**100%**	**106**	**100%**	**28**	**100%**

Vehicles owned with a proposed daily charge of £10 or below to enter or travel in the Clean Air Zone

	Minibus		Van/LGV		Private Hire Vehicle		Hackney Carriage	
	N	%	N	%	N	%	N	%
Yes	23	96%	285	98%	22	96%	6	32%
No	1	4%	6	2%	1	4%	13	68%
Base	**24**	**100%**	**291**	**100%**	**23**	**100%**	**19**	**100%**

Before this consultation, were you aware of the legal requirement placed on Greater Manchester from Government to introduce plans to tackle air pollution and to introduce a category C charging Clean Air Zone?

Respondent type

	General Public		Business		Taxi		Representatives	
	N	%	N	%	N	%	N	%
Yes	1427	46%	252	60%	245	74%	65	73%
No	1703	54%	168	40%	87	26%	24	27%
Base	**3130**	**100%**	**420**	**100%**	**332**	**100%**	**89**	**100%**

Vehicles owned with a proposed daily charge of £60 to enter or travel in the Clean Air Zone

	Bus		Coach		HGV		HGV Leisure	
	N	%	N	%	N	%	N	%
Yes	32	70%	22	81%	100	70%	139	53%
No	12	26%	5	19%	43	30%	123	47%
Base	**46**	**100%**	**27**	**100%**	**143**	**100%**	**262**	**100%**

Vehicles owned with a proposed daily charge of £10 or below to enter or travel in the Clean Air Zone

	Minibus		Van/LGV		Private Hire Vehicle		Hackney Carriage	
	N	%	N	%	N	%	N	%
Yes	27	63%	322	54%	133	66%	130	79%
No	16	37%	274	46%	67	33%	35	21%
Base	**43**	**100%**	**598**	**100%**	**201**	**100%**	**165**	**100%**

Do you currently own/lease or drive any of the following vehicles?

Respondent type

	General Public		Business		Taxi		Representatives	
	N	%	N	%	N	%	N	%
Bus	27	1%	15	4%	4	1%	0	0%
Coach	4	0%	13	3%	9	3%	1	1%
Minibus	17	1%	15	4%	4	1%	7	8%
HGV Leisure	233	7%	23	5%	2	1%	4	4%
LGV	293	9%	283	67%	4	1%	18	20%
HGV	35	1%	102	24%	2	1%	4	4%
PHV	14	0%	13	3%	172	51%	2	2%
Hackney	2	0%	18	4%	142	43%	3	3%
Private car or motorbike	2478	79%	217	51%	46	14%	56	62%
Other vehicle	70	2%	17	4%	1	0%	5	5%
None	414	13%	7	2%	7	2%	21	23%
Base	**3146**	**100%**	**422**	**100%**	**334**	**100%**	**91**	**100%**

Vehicles owned with a proposed daily charge of £60 to enter or travel in the Clean Air Zone

	Bus		Coach		HGV		HGV Leisure	
	N	%	N	%	N	%	N	%
Bus	46	100%	1	1%	3	1%	14	52%
Coach	14	30%	2	2%	2	1%	27	100%
Minibus	9	20%	7	8%%	5	2%	8	30%
HGV Leisure	3	7%	7	8%	262	100%	2	7%
LGV	13	28%	23	25%	49	19%	12	44%
HGV	1	2%	6	6%	18	7%	1	4%
PHV	7	15%	2	2%	4	2%	7	26%
Hackney	1	2%	1	1%	4	2%	1	4%
Private car or motorbike	25	54%	63	68%	148	56%	8	30%
Other vehicle	1	2%	93	100%	7	3%	2	7%
None	0	0%	0	0%	0	0%	0	0%
Base	**46**	**100%**	**93**	**100%**	**262**	**100%**	**27**	**100%**

Vehicles owned with a proposed daily charge of £10 or below to enter or travel in the Clean Air Zone

	Minibus		Van/LGV		Private Hire Vehicle		Hackney Carriage	
	N	%	N	%	N	%	N	%
Bus	0	0%	9	21%	13	2%	1	1%
Coach	0	0%	8	19%	12	2%	1	1%
Minibus	0	0%	43	100%	21	4%	5	3%
HGV Leisure	0	0%	5	12%	49	8%	18	13%
LGV	0	0%	21	49%	598	100%	77	54%
HGV	0	0%	5	12%	77	13%	143	100%
PHV	0	0%	10	23%	8	1%	4	3%
Hackney	0	0%	2	5%	3	1%	3	2%
Private car or motorbike	0	0%	26	60%	332	56%	78	55%
Other vehicle	0	0%	7	16%	23	4%	6	4%
None	449	100%	0	0%	0	0%	0	0%
Base	**449**	**100%**	**43**	**100%**	**598**	**100%**	**143**	**100%**

Under the current proposals would you have to pay a charge for your bus to travel in the Clean Air Zone?

Respondent type

	General Public		Business		Taxi		Representatives	
	N	%	N	%	N	%	N	%
Yes	13	50%	10	67%	3	75%	0	0%
No	6	23%	5	33%	0	0%	0	0%
Don't know	5	19%	0	0%	0	0%	0	0%
Not applicable/don't have a vehicle	2	8%	0	0%	1	25%	0	0%
Base	**26**	**100%**	**15**	**100%**	**4**	**100%**	**0**	**0%**

Vehicles owned with a proposed daily charge of £60 to enter or travel in the Clean Air Zone

	Bus		Coach		HGV		HGV Leisure	
	N	%	N	%	N	%	N	%
Yes	26	58%	9	64%	0	0%	2	67%
No	11	24%	2	14%	1	100%	1	33%
Don't know	5	11%	2	14%	0	0%	0	0%
Not applicable/don't have a vehicle	3	7%	1	7%	0	0%	0	0%
Base	**45**	**100%**	**14**	**100%**	**1**	**100%**	**3**	**100%**

Vehicles owned with a proposed daily charge of £10 or below to enter or travel in the Clean Air Zone

	Minibus		Van/LGV		Private Hire Vehicle		Hackney Carriage	
	N	%	N	%	N	%	N	%
Yes	5	56%	7	54%	6	86%	0	0%
No	2	22%	4	31%	1	14%	1	100%
Don't know	2	22%	1	8%	0	0%	0	0%
Not applicable/don't have a vehicle	0	0%	1	8%	0	0%	0	0%
Base	**9**	**100%**	**13**	**100%**	**7**	**100%**	**1**	**100%**

Why will you not have a to pay a charge to travel in the Clean Air Zone? Bus

Respondent type

	General Public		Business		Taxi		Representatives	
	N	%	N	%	N	%	N	%
Don't have a vehicle	1	17%	1	20%	0	0%	0	0%
Don't travel in the Clean Air Zone	0	0%	1	20%	0	0%	0	0%
Vehicle(s) will be compliant	2	33%	1	20%	0	0%	0	0%
Vehicle(s) are exempt	2	33%	1	20%	0	0%	0	0%
Don't know	1	17%	1	20%	0	0%	0	0%
Base	**6**	**100%**	**5**	**100%**	**0**	**0%**	**0**	**0%**

Vehicles owned with a proposed daily charge of £60 to enter or travel in the Clean Air Zone

	Bus		Coach		HGV		HGV Leisure	
	N	%	N	%	N	%	N	%
Don't have a vehicle	2	18%	0	0%	0	0%	0	0%
Don't travel in the Clean Air Zone	1	9%	1	50%	0	0%	0	0%
Vehicle(s) will be compliant	3	27%	0	0%	0	0%	0	0%
Vehicle(s) are exempt	3	27%	0	0%	0	0%	0	0%
Don't know	2	18%	1	50%	1	100%	1	100%
Base	**11**	**100%**	**2**	**100%**	**1**	**100%**	**1**	**100%**

Vehicles owned with a proposed daily charge of £10 or below to enter or travel in the Clean Air Zone

	Minibus		Van/LGV		Private Hire Vehicle		Hackney Carriage	
	N	%	N	%	N	%	N	%
Don't have a vehicle	0	0%	0	0%	0	0%	0	0%
Don't travel in the Clean Air Zone	0	0%	1	25%	0	0%	0	0%
Vehicle(s) will be compliant	0	0%	1	25%	0	0%	0	0%
Vehicle(s) are exempt	1	50%	1	25%	0	0%	0	0%
Don't know	1	50%	1	25%	1	100%	1	100%
Base	**2**	**100%**	**4**	**100%**	**1**	**100%**	**1**	**100%**

Under the current proposals would you have to pay a charge for your coach to travel in the Clean Air Zone?

Respondent type

	General Public		Business		Taxi		Representatives	
	N	%	N	%	N	%	N	%
Yes	2	50%	12	92%	9	100%	0	0%
No	0	0%	1	8%	0	0%	0	0%
Don't know	2	50%	0	0%	0	0%	1	100%
Not applicable/don't have a vehicle	0	0%	0	0%	0	0%	0	0%
Base	**4**	**100%**	**13**	**100%**	**9**	**100%**	**1**	**100%**

Vehicles owned with a proposed daily charge of £60 to enter or travel in the Clean Air Zone

	Bus		Coach		HGV		HGV Leisure	
	N	%	N	%	N	%	N	%
Yes	11	79%	23	85%	0	0%	1	50%
No	1	7%	1	4%	1	100%	1	50%
Don't know	2	14%	3	11%	0	0%	0	0%
Not applicable/don't have a vehicle	0	0%	0	0%	0	0%	0	0%
Base	**14**	**100%**	**27**	**100%**	**1**	**100%**	**2**	**100%**

Vehicles owned with a proposed daily charge of £10 or below to enter or travel in the Clean Air Zone

	Minibus		Van/LGV		Private Hire Vehicle		Hackney Carriage	
	N	%	N	%	N	%	N	%
Yes	5	63%	9	75%	5	71%	0	0%
No	1	13%	1	8%	1	14%	1	100%
Don't know	2	25%	2	17%	1	14%	0	0%
Not applicable/don't have a vehicle	0	0%	0	0%	0	0%	0	0%
Base	**8**	**100%**	**12**	**100%**	**7**	**100%**	**1**	**100%**

Why will you not have a to pay a charge to travel in the Clean Air Zone? Coach

Respondent type

	General Public		Business		Taxi		Representatives	
	N	%	N	%	N	%	N	%
Don't have a vehicle	0	0%	0	0%	0	0%	0	0%
Don't travel in the Clean Air Zone	0	0%	0	0%	0	0%	0	0%
Vehicle(s) will be compliant	0	0%	0	0%	0	0%	0	0%
Vehicle(s) are exempt	0	0%	0	0%	0	0%	0	0%
Don't know	0	0%	1	100%	0	0%	0	0%
Base	**0**	**0%**	**1**	**100%**	**0**	**0%**	**0**	**0%**

Vehicles owned with a proposed daily charge of £60 to enter or travel in the Clean Air Zone

	Bus		Coach		HGV		HGV Leisure	
	N	%	N	%	N	%	N	%
Don't have a vehicle	0	0%	0	0%	0	0%	0	0%
Don't travel in the Clean Air Zone	0	0%	0	0%	0	0%	0	0%
Vehicle(s) will be compliant	0	0%	0	0%	0	0%	0	0%
Vehicle(s) are exempt	0	0%	0	0%	0	0%	0	0%
Don't know	1	100%	1	100%	1	100%	1	100%
Base	**1**	**100%**	**1**	**100%**	**1**	**100%**	**1**	**100%**

Vehicles owned with a proposed daily charge of £10 or below to enter or travel in the Clean Air Zone

	Minibus		Van/LGV		Private Hire Vehicle		Hackney Carriage	
	N	%	N	%	N	%	N	%
Don't have a vehicle	0	0%	0	0%	0	0%	0	0%
Don't travel in the Clean Air Zone	0	0%	0	0%	0	0%	0	0%
Vehicle(s) will be compliant	0	0%	0	0%	0	0%	0	0%
Vehicle(s) are exempt	0	0%	0	0%	0	0%	0	0%
Don't know	1	100%	1	100%	1	100%	1	100%
Base	**1**	**100%**	**1**	**100%**	**1**	**100%**	**1**	**100%**

Under the current proposals would you have to pay a charge for your minibus to travel in the Clean Air Zone?

Respondent type

	General Public		Business		Taxi		Representatives	
	N	%	N	%	N	%	N	%
Yes	10	59%	8	62%	4	100%	5	71%
No	1	6%	4	31%	0	0%	1	14%
Don't know	5	29%	0	0%	0	0%	1	14%
Not applicable/don't have a vehicle	1	6%	1	8%	0	0%	0	0%
Base	**17**	**100%**	**13**	**100%**	**4**	**100%**	**7**	**100%**

Vehicles owned with a proposed daily charge of £60 to enter or travel in the Clean Air Zone

	Bus		Coach		HGV		HGV Leisure	
	N	%	N	%	N	%	N	%
Yes	4	50%	4	50%	2	50%	2	40%
No	1	13%	2	25%	2	50%	3	60%
Don't know	2	25%	2	25%	0	0%	0	0%
Not applicable/don't have a vehicle	1	13%	0	0%	0	0%	0	0%
Base	**8**	**100%**	**8**	**100%**	**4**	**100%**	**5**	**100%**

Vehicles owned with a proposed daily charge of £10 or below to enter or travel in the Clean Air Zone

	Minibus		Van/LGV		Private Hire Vehicle		Hackney Carriage	
	N	%	N	%	N	%	N	%
Yes	27	66%	10	53%	7	70%	0	0%
No	6	15%	5	26%	2	20%	2	100%
Don't know	6	15%	4	21%	1	10%	0	0%
Not applicable/don't have a vehicle	2	5%	0	0%	0	0%	0	0%
Base	**41**	**100%**	**19**	**100%**	**10**	**100%**	**2**	**100%**

Why will you not have a to pay a charge to travel in the Clean Air Zone? Minibus

Respondent type

	General Public		Business		Taxi		Representatives	
	N	%	N	%	N	%	N	%
Don't have a vehicle	0	0%	0	0%	0	0%	0	0%
Don't travel in the Clean Air Zone	0	0%	0	0%	0	0%	0	0%
Vehicle(s) will be compliant	1	100%	3	75%	0	0%	0	0%
Vehicle(s) are exempt	0	0%	0	0%	0	0%	0	0%
Don't know	0	0%	1	25%	0	0%	1	100%
Base	**1**	**100%**	**4**	**100%**	**0**	**0%**	**1**	**100%**

Vehicles owned with a proposed daily charge of £60 to enter or travel in the Clean Air Zone?

	Bus		Coach		HGV		HGV Leisure	
	N	%	N	%	N	%	N	%
Don't have a vehicle	0	0%	0	0%	0	0%	0	0%
Don't travel in the Clean Air Zone	0	0%	0	0%	0	0%	0	0%
Vehicle(s) will be compliant	0	0%	1	50%	1	50%	2	67%
Vehicle(s) are exempt	0	0%	0	0%	0	0%	0	0%
Don't know	1	100%	1	50%	1	50%	1	33%
Base	**1**	**100%**	**2**	**100%**	**2**	**100%**	**3**	**100%**

Vehicles owned with a proposed daily charge of £10 or below to enter or travel in the Clean Air Zone

	Minibus		Van/LGV		Private Hire Vehicle		Hackney Carriage	
	N	%	N	%	N	%	N	%
Don't have a vehicle	0	0%	0	0%	0	0%	0	0%
Don't travel in the Clean Air Zone	0	0%	0	0%	0	0%	0	0%
Vehicle(s) will be compliant	4	67%	4	80%	1	50%	1	50%
Vehicle(s) are exempt	0	0%	0	0%	0	0%	0	0%
Don't know	2	33%	1	20%	1	50%	1	50%
Base	**6**	**100%**	**5**	**100%**	**2**	**100%**	**2**	**100%**

Under the current proposals would you have to pay a charge for your HGV Leisure to travel in the Clean Air Zone?

Respondent type

	General Public		Business		Taxi		Representatives	
	N	%	N	%	N	%	N	%
Yes	199	85%	17	74%	1	50%	3	75%
No	10	4%	5	22%	1	50%	1	25%
Don't know	24	10%	1	4%	0	0%	0	0%
Not applicable/don't have a vehicle	0	0%	0	0%	0	0%	0	0%
Base	**233**	**100%**	**23**	**100%**	**2**	**100%**	**4**	**100%**

Vehicles owned with a proposed daily charge of £60 to enter or travel in the Clean Air Zone?

	Bus		Coach		HGV		HGV Leisure	
	N	%	N	%	N	%	N	%
Yes	2	67%	0	0%	14	78%	220	84%
No	1	33%	2	100%	4	22%	17	6%
Don't know	0	0%	0	0%	0	0%	25	10%
Not applicable/don't have a vehicle	0	0%	0	0%	0	0%	0	0%
Base	**3**	**100%**	**2**	**100%**	**18**	**100%**	**262**	**100%**

Vehicles owned with a proposed daily charge of £10 or below to enter or travel in the Clean Air Zone

	Minibus		Van/LGV		Private Hire Vehicle		Hackney Carriage	
	N	%	N	%	N	%	N	%
Yes	1	20%	39	80%	1	25%	2	50%
No	4	80%	8	16%	3	75%	2	50%
Don't know	0	0%	2	4%	0	0%	0	0%
Not applicable/don't have a vehicle	0	0%	0	0%	0	0%	0	0%
Base	**5**	**100%**	**49**	**100%**	**4**	**100%**	**4**	**100%**

Why will you not have a to pay a charge to travel in the Clean Air Zone? HGV Leisure

Respondent type

	General Public		Business		Taxi		Representatives	
	N	%	N	%	N	%	N	%
Don't have a vehicle	0	0%	0	0%	0	0%	0	0%
Don't travel in the Clean Air Zone	0	0%	1	20%	0	0%	0	0%
Vehicle(s) will be compliant	4	40%	2	40%	1	100%	0	0%
Vehicle(s) are exempt	4	40%	1	20%	0	0%	1	100%
Don't know	2	20%	1	20%	0	0%	0	0%
Base	**10**	**100%**	**5**	**100%**	**1**	**100%**	**1**	**100%**

Vehicles owned with a proposed daily charge of £60 to enter or travel in the Clean Air Zone?

	Bus		Coach		HGV		HGV Leisure	
	N	%	N	%	N	%	N	%
Don't have a vehicle	0	0%	0	0%	0	0%	0	0%
Don't travel in the Clean Air Zone	0	0%	0	0%	1	25%	1	6%
Vehicle(s) will be compliant	0	0%	1	50%	1	25%	7	41%
Vehicle(s) are exempt	0	0%	0	0%	1	25%	6	35%
Don't know	1	100%	1	50%	1	25%	3	18%
Base	**1**	**100%**	**2**	**100%**	**4**	**100%**	**17**	**100%**

Vehicles owned with a proposed daily charge of £10 or below to enter or travel in the Clean Air Zone

	Minibus		Van/LGV		Private Hire Vehicle		Hackney Carriage	
	N	%	N	%	N	%	N	%
Don't have a vehicle	0	0%	0	0%	0	0%	0	0%
Don't travel in the Clean Air Zone	0	0%	1	13%	0	0%	0	0%
Vehicle(s) will be compliant	3	75%	3	38%	2	67%	1	50%
Vehicle(s) are exempt	0	0%	3	38%	0	0%	0	0%
Don't know	1	25%	1	13%	1	33%	1	50%
Base	**4**	**100%**	**8**	**100%**	**3**	**100%**	**2**	**100%**

Under the current proposals would you have to pay a charge for your van/light goods vehicle (LGV) to travel in the Clean Air Zone?

Respondent type

	General Public		Business		Taxi		Representatives	
	N	%	N	%	N	%	N	%
Yes	219	76%	246	87%	2	50%	15	83%
No	36	12%	24	9%	2	50%	2	11%
Don't know	32	11%	12	4%	0	0%	1	6%
Not applicable/don't have a vehicle	3	1%	0	0%	0	0%	0	0%
Base	**290**	**100%**	**282**	**100%**	**4**	**100%**	**18**	**100%**

Vehicles owned with a proposed daily charge of £60 to enter or travel in the Clean Air Zone?

	Bus		Coach		HGV		HGV Leisure	
	N	%	N	%	N	%	N	%
Yes	5	38%	7	58%	61	80%	40	82%
No	5	38%	3	25%	10	13%	7	14%
Don't know	2	15%	2	17%	4	5%	1	2%
Not applicable/don't have a vehicle	1	8%	0	0%	1	1%	1	2%
Base	**13**	**100%**	**12**	**100%**	**76**	**100%**	**49**	**100%**

Vehicles owned with a proposed daily charge of £10 or below to enter or travel in the Clean Air Zone

	Minibus		Van/LGV		Private Hire Vehicle		Hackney Carriage	
	N	%	N	%	N	%	N	%
Yes	10	50%	482	81%	5	63%	0	0%
No	4	20%	64	11%	2	25%	3	100%
Don't know	6	30%	45	8%	1	13%	0	0%
Not applicable/don't have a vehicle	0	0%	3	1%	0	0%	0	0%
Base	**20**	**100%**	**594**	**100%**	**8**	**100%**	**3**	**100%**

Why will you not have a to pay a charge to travel in the Clean Air Zone? LGV

Respondent type

	General Public		Business		Taxi		Representatives	
	N	%	N	%	N	%	N	%
Don't have a vehicle	0	0%	0	0%	0	0%	0	0%
Don't travel in the Clean Air Zone	2	6%	2	8%	0	0%	0	0%
Vehicle(s) will be compliant	21	58%	20	83%	2	100%	2	100%
Vehicle(s) are exempt	8	22%	1	4%	0	0%	0	0%
Don't know	5	14%	1	4%	0	0%	0	0%
Base	**36**	**100%**	**24**	**100%**	**2**	**100%**	**2**	**100%**

Vehicles owned with a proposed daily charge of £60 to enter or travel in the Clean Air Zone?

	Bus		Coach		HGV		HGV Leisure	
	N	%	N	%	N	%	N	%
Don't have a vehicle	0	0%	0	0%	0	0%	0	0%
Don't travel in the Clean Air Zone	0	0%	0	0%	1	10%	1	14%
Vehicle(s) will be compliant	3	60%	2	67%	8	80%	5	71%
Vehicle(s) are exempt	1	20%	0	0%	0	0%	0	0%
Don't know	1	20%	1	33%	1	10%	1	14%
Base	**5**	**100%**	**3**	**100%**	**10**	**100%**	**7**	**100%**

Vehicles owned with a proposed daily charge of £10 or below to enter or travel in the Clean Air Zone

	Minibus		Van/LGV		Private Hire Vehicle		Hackney Carriage	
	N	%	N	%	N	%	N	%
Don't have a vehicle	0	0%	0	0%	0	0%	0	0%
Don't travel in the Clean Air Zone	0	0%	4	6%	0	0%	0	0%
Vehicle(s) will be compliant	2	50%	45	70%	1	50%	2	67%
Vehicle(s) are exempt	1	25%	9	14%	0	0%	0	0%
Don't know	1	25%	6	9%	1	50%	1	33%
Base	**4**	**100%**	**64**	**100%**	**2**	**100%**	**3**	**100%**

Under the current proposals would you have to pay a charge for your heavy goods vehicle (HGV) to travel in the Clean Air Zone?

Respondent type

	General Public		Business		Taxi		Representatives	
	N	%	N	%	N	%	N	%
Yes	22	63%	85	86%	1	50%	3	75%
No	5	14%	8	8%	0	0%	0	0%
Don't know	6	17%	6	6%	1	50%	1	25%
Not applicable/don't have a vehicle	2	6%	0	0%	0	0%	0	0%
Base	**35**	**100%**	**99**	**100%**	**2**	**100%**	**4**	**100%**

Vehicles owned with a proposed daily charge of £60 to enter or travel in the Clean Air Zone?

	Bus		Coach		HGV		HGV Leisure	
	N	%	N	%	N	%	N	%
Yes	0	0%	0	0%	111	79%	15	83%
No	1	100%	1	100%	13	9%	2	11%
Don't know	0	0%	0	0%	14	10%	0	0%
Not applicable/don't have a vehicle	0	0%	0	0%	2	1%	1	6%
Base	**1**	**100%**	**1**	**100%**	**140**	**100%**	**18**	**100%**

Vehicles owned with a proposed daily charge of £10 or below to enter or travel in the Clean Air Zone

	Minibus		Van/LGV		Private Hire Vehicle		Hackney Carriage	
	N	%	N	%	N	%	N	%
Yes	1	25%	61	82%	2	50%	2	67%
No	2	50%	7	9%	1	25%	1	33%
Don't know	1	25%	5	7%	1	25%	0	0%
Not applicable/don't have a vehicle	0	0%	1	1%	0	0%	0	0%
Base	**4**	**100%**	**74**	**100%**	**4**	**100%**	**3**	**100%**

Why will you not have a to pay a charge to travel in the Clean Air Zone? HGV

Respondent type

	General Public		Business		Taxi		Representatives	
	N	%	N	%	N	%	N	%
Don't have a vehicle	1	20%	0	0%	0	0%	0	0%
Don't travel in the Clean Air Zone	2	40%	0	0%	0	0%	0	0%
Vehicle(s) will be compliant	2	40%	6	75%	0	0%	0	0%
Vehicle(s) are exempt	0	0%	0	0%	0	0%	0	0%
Don't know	0	0%	2	25%	0	0%	0	0%
Base	**5**	**100%**	**8**	**100%**	**0**	**0%**	**0**	**0%**

Vehicles owned with a proposed daily charge of £60 to enter or travel in the Clean Air Zone?

	Bus		Coach		HGV		HGV Leisure	
	N	%	N	%	N	%	N	%
Don't have a vehicle	0	0%	0	0%	1	8%	0	0%
Don't travel in the Clean Air Zone	0	0%	0	0%	2	15%	0	0%
Vehicle(s) will be compliant	0	0%	0	0%	8	62%	1	50%
Vehicle(s) are exempt	0	0%	0	0%	0	0%	0	0%
Don't know	1	100%	1	100%	2	15%	1	50%
Base	**1**	**100%**	**1**	**100%**	**13**	**100%**	**2**	**100%**

Vehicles owned with a proposed daily charge of £10 or below to enter or travel in the Clean Air Zone

	Minibus		Van/LGV		Private Hire Vehicle		Hackney Carriage	
	N	%	N	%	N	%	N	%
Don't have a vehicle	0	0%	0	0%	0	0%	0	0%
Don't travel in the Clean Air Zone	0	0%	0	0%	0	0%	0	0%
Vehicle(s) will be compliant	1	50%	6	86%	0	0%	0	0%
Vehicle(s) are exempt	0	0%	0	0%	0	0%	0	0%
Don't know	1	50%	1	14%	1	100%	1	100%
Base	**2**	**100%**	**7**	**100%**	**1**	**100%**	**1**	**100%**

Under the current proposals would you have to pay a charge for your private hire vehicle to travel in the Clean Air Zone?

Respondent type

	General Public		Business		Taxi		Representatives	
	N	%	N	%	N	%	N	%
Yes	7	54%	8	62%	101	59%	1	50%
No	4	31%	4	31%	45	26%	0	0%
Don't know	2	15%	1	8%	25	15%	1	50%
Not applicable/don't have a vehicle	0	0%	0	0%	0	0%	0	0%
Base	**13**	**100%**	**13**	**100%**	**171**	**100%**	**2**	**100%**

Vehicles owned with a proposed daily charge of £60 to enter or travel in the Clean Air Zone?

	Bus		Coach		HGV		HGV Leisure	
	N	%	N	%	N	%	N	%
Yes	5	83%	5	71%	0	0%	1	25%
No	1	17%	1	14%	4	100%	3	75%
Don't know	0	0%	1	14%	0	0%	0	0%
Not applicable/don't have a vehicle	0	0%	0	0%	0	0%	0	0%
Base	**6**	**100%**	**7**	**100%**	**4**	**100%**	**4**	**100%**

Vehicles owned with a proposed daily charge of £10 or below to enter or travel in the Clean Air Zone

	Minibus		Van/LGV		Private Hire Vehicle		Hackney Carriage	
	N	%	N	%	N	%	N	%
Yes	7	70%	4	50%	117	59%	3	50%
No	2	20%	2	25%	53	27%	3	50%
Don't know	1	10%	2	25%	29	15%	0	0%
Not applicable / don't have a vehicle	0	0%	0	0%	0	0%	0	0%
Base	**10**	**100%**	**8**	**100%**	**199**	**100%**	**6**	**100%**

Why will you not have a to pay a charge to travel in the Clean Air Zone? Private hire vehicle

Respondent type

	General Public		Business		Taxi		Representatives	
	N	%	N	%	N	%	N	%
Don't have a vehicle	1	25%	0	0%	0	0%	0	0%
Don't travel in the Clean Air Zone	0	0%	0	0%	3	7%	0	0%
Vehicle(s) will be compliant	3	75%	2	50%	21	47%	0	0%
Vehicle(s) are exempt	0	0%	1	25%	11	24%	0	0%
Don't know	0	0%	1	25%	10	22%	0	0%
Base	**4**	**100%**	**4**	**100%**	**45**	**100%**	**0**	**0%**

Vehicles owned with a proposed daily charge of £60 to enter or travel in the Clean Air Zone?

	Bus		Coach		HGV		HGV Leisure	
	N	%	N	%	N	%	N	%
Don't have a vehicle	0	0%	0	0%	0	0%	0	0%
Don't travel in the Clean Air Zone	0	0%	0	0%	1	25%	0	0%
Vehicle(s) will be compliant	0	0%	0	0%	2	50%	2	67%
Vehicle(s) are exempt	0	0%	0	0%	0	0%	0	0%
Don't know	1	100%	1	100%	1	25%	1	33%
Base	**1**	**100%**	**1**	**100%**	**4**	**100%**	**3**	**100%**

Vehicles owned with a proposed daily charge of £10 or below to enter or travel in the Clean Air Zone

	Minibus		Van/LGV		Private Hire Vehicle		Hackney Carriage	
	N	%	N	%	N	%	N	%
Don't have a vehicle	0	0%	0	0%	1	2%	0	0%
Don't travel in the Clean Air Zone	0	0%	0	0%	3	6%	0	0%
Vehicle(s) will be compliant	1	50%	1	50%	26	49%	2	67%
Vehicle(s) are exempt	0	0%	0	0%	12	23%	0	0%
Don't know	1	50%	1	50%	11	21%	1	33%
Base	**2**	**100%**	**2**	**100%**	**53**	**100%**	**3**	**100%**

Under the current proposals would you have to pay a charge for your hackney to travel in the Clean Air Zone?

Respondent type

	General Public		Business		Taxi		Representatives	
	N	%	N	%	N	%	N	%
Yes	1	50%	15	83%	109	77%	2	67%
No	0	0%	3	17%	25	18%	0	0%
Don't know	1	50%	0	0%	8	6%	1	33%
Not applicable/don't have a vehicle	0	0%	0	0%	0	0%	0	0%
Base	**2**	**100%**	**18**	**100%**	**142**	**100%**	**3**	**100%**

Vehicles owned with a proposed daily charge of £60 to enter or travel in the Clean Air Zone?

	Bus		Coach		HGV		HGV Leisure	
	N	%	N	%	N	%	N	%
Yes	0	0%	0	0%	1	33%	2	50%
No	1	100%	1	100%	2	67%	2	50%
Don't know	0	0%	0	0%	0	0%	0	0%
Not applicable/don't have a vehicle	0	0%	0	0%	0	0%	0	0%
Base	**1**	**100%**	**1**	**100%**	**3**	**100%**	**4**	**100%**

Vehicles owned with a proposed daily charge of £10 or below to enter or travel in the Clean Air Zone

	Minibus		Van/LGV		Private Hire Vehicle		Hackney Carriage	
	N	%	N	%	N	%	N	%
Yes	0	0%	1	33%	3	50%	127	77%
No	2	100%	2	67%	3	50%	28	17%
Don't know	0	0%	0	0%	0	0%	10	6%
Not applicable/don't have a vehicle	0	0%	0	0%	0	0%	0	0%
Base	**2**	**100%**	**3**	**100%**	**6**	**100%**	**165**	**100%**

Why will you not have a to pay a charge to travel in the Clean Air Zone? Hackney

Respondent type

	General Public		Business		Taxi		Representatives	
	N	%	N	%	N	%	N	%
Don't have a vehicle	0	0%	0	0%	0	0%	0	0%
Don't travel in the Clean Air Zone	0	0%	0	0%	2	9%	0	0%
Vehicle(s) will be compliant	0	0%	1	33%	16	73%	0	0%
Vehicle(s) are exempt	0	0%	1	33%	2	9%	0	0%
Don't know	0	0%	1	33%	2	9%	0	0%
Base	**0**	**0%**	**3**	**100%**	**22**	**100%**	**0**	**0%**

Vehicles owned with a proposed daily charge of £60 to enter or travel in the Clean Air Zone?

	Bus		Coach		HGV		HGV Leisure	
	N	%	N	%	N	%	N	%
Don't have a vehicle	0	0%	0	0%	0	0%	0	0%
Don't travel in the Clean Air Zone	0	0%	0	0%	0	0%	0	0%
Vehicle(s) will be compliant	0	0%	0	0%	1	50%	1	50%
Vehicle(s) are exempt	0	0%	0	0%	0	0%	0	0%
Don't know	1	100%	1	100%	1	50%	1	50%
Base	**1**	**100%**	**1**	**100%**	**2**	**100%**	**2**	**100%**

Vehicles owned with a proposed daily charge of £10 or below to enter or travel in the Clean Air Zone

	Minibus		Van/LGV		Private Hire Vehicle		Hackney Carriage	
	N	%	N	%	N	%	N	%
Don't have a vehicle	0	0%	0	0%	0	0%	0	0%
Don't travel in the Clean Air Zone	0	0%	0	0%	0	0%	2	8%
Vehicle(s) will be compliant	1	50%	1	50%	2	67%	17	68%
Vehicle(s) are exempt	0	0%	0	0%	0	0%	3	12%
Don't know	1	50%	1	50%	1	33%	3	12%
Base	**2**	**100%**	**2**	**100%**	**3**	**100%**	**25**	**100%**

Under the current proposals would you have to pay a charge for your Other type of Vehicle to travel in the Clean Air Zone?

Respondent type

	General Public		Business		Taxi		Representatives	
	N	%	N	%	N	%	N	%
Yes	22	31%	8	47%	1	100%	1	20%
No	23	32%	6	35%	0	0%	2	40%
Don't know	26	37%	3	18%	0	0%	2	40%
Not applicable/don't have a vehicle	0	0%	0	0%	0	0%	0	0%
Base	**71**	**100%**	**17**	**100%**	**1**	**100%**	**5**	**100%**

Vehicles owned with a proposed daily charge of £60 to enter or travel in the Clean Air Zone?

	Bus		Coach		HGV		HGV Leisure	
	N	%	N	%	N	%	N	%
Yes	0	0%	0	0%	1	20%	1	14%
No	1	100%	1	50%	3	60%	3	43%
Don't know	0	0%	1	50%	1	20%	3	43%
Not applicable/don't have a vehicle	0	0%	0	0%	0	0%	0	0%
Base	**1**	**100%**	**2**	**100%**	**5**	**100%**	**7**	**100%**

Vehicles owned with a proposed daily charge of £10 or below to enter or travel in the Clean Air Zone

	Minibus		Van/LGV		Private Hire Vehicle		Hackney Carriage	
	N	%	N	%	N	%	N	%
Yes	2	29%	8	36%	0	0%	0	0%
No	3	43%	6	27%	1	50%	1	100%
Don't know	2	29%	8	36%	1	50%	0	0%
Not applicable/don't have a vehicle	0	0%	0	0%	0	0%	0	0%
Base	**7**	**100%**	**22**	**100%**	**2**	**100%**	**1**	**100%**

Why will you not have a to pay a charge to travel in the Clean Air Zone? Other vehicle

Respondent type

	General Public		Business		Taxi		Representatives	
	N	%	N	%	N	%	N	%
Don't have a vehicle	0	0%	0	0%	0	0%	0	0%
Don't travel in the Clean Air Zone	2	9%	0	0%	0	0%	0	0%
Vehicle(s) will be compliant	7	30%	1	17%	0	0%	0	0%
Vehicle(s) are exempt	12	52%	3	50%	0	0%	2	100%
Don't know	2	9%	2	33%	0	0%	0	0%
Base	**23**	**100%**	**6**	**100%**	**0**	**0%**	**2**	**100%**

Vehicles owned with a proposed daily charge of £60 to enter or travel in the Clean Air Zone?

	Bus		Coach		HGV		HGV Leisure	
	N	%	N	%	N	%	N	%
Don't have a vehicle	0	0%	0	0%	0	0%	0	0%
Don't travel in the Clean Air Zone	0	0%	0	0%	0	0%	0	0%
Vehicle(s) will be compliant	0	0%	0	0%	0	0%	2	67%
Vehicle(s) are exempt	0	0%	0	0%	2	67%	0	0%
Don't know	1	100%	1	100%	1	33%	1	33%
Base	**1**	**100%**	**1**	**100%**	**3**	**100%**	**3**	**100%**

Vehicles owned with a proposed daily charge of £10 or below to enter or travel in the Clean Air Zone

	Minibus		Van/LGV		Private Hire Vehicle		Hackney Carriage	
	N	%	N	%	N	%	N	%
Don't have a vehicle	0	0%	0	0%	0	0%	0	0%
Don't travel in the Clean Air Zone	0	0%	0	0%	0	0%	0	0%
Vehicle(s) will be compliant	0	0%	0	0%	0	0%	0	0%
Vehicle(s) are exempt	2	67%	5	83%	0	0%	0	0%
Don't know	1	33%	1	17%	1	100%	1	100%
Base	**3**	**100%**	**6**	**100%**	**1**	**100%**	**1**	**100%**

Buses: Please tell us what you think of the proposed daily charges for each of the vehicles?

Respondent type

	General Public		Business		Taxi		Representatives	
	N	%	N	%	N	%	N	%
Too much	1553	52%	244	70%	182	75%	28	35%
About right	878	29%	58	17%	24	10%	34	43%
Too little	295	10%	21	6%	11	5%	10	13%
Don't know	277	9%	28	8%	25	10%	8	10%
Base	**3003**	**100%**	**351**	**100%**	**242**	**100%**	**80**	**100%**

Vehicles owned with a proposed daily charge of £60 to enter or travel in the Clean Air Zone?

	Bus		Coach		HGV		HGV Leisure	
	N	%	N	%	N	%	N	%
Too much	36	86%	22	85%	81	72%	173	71%
About right	1	2%	1	4%	15	13%	35	14%
Too little	4	10%	2	8%	8	7%	5	2%
Don't know	1	2%	1	4%	9	8%	29	12%
Base	**42**	**100%**	**26**	**100%**	**113**	**100%**	**242**	**100%**

Vehicles owned with a proposed daily charge of £10 or below to enter or travel in the Clean Air Zone

	Minibus		Van/LGV		Private Hire Vehicle		Hackney Carriage	
	N	%	N	%	N	%	N	%
Too much	26	72%	346	68%	113	72%	84	78%
About right	4	11%	93	18%	18	11%	8	7%
Too little	3	8%	31	6%	7	4%	5	5%
Don't know	3	8%	40	8%	20	13%	11	10%
Base	36	100%	510	100%	158	100%	108	100%

Coaches: Please tell us what you think of the proposed daily charges for each of the vehicles?

Respondent type

	General Public		Business		Taxi		Representatives	
	N	%	N	%	N	%	N	%
Too much	1204	43%	228	69%	130	73%	21	28%
About right	991	36%	56	17%	26	15%	34	45%
Too little	345	12%	20	6%	7	4%	12	16%
Don't know	246	9%	28	8%	16	9%	8	11%
Base	**2786**	**100%**	**332**	**100%**	**179**	**100%**	**75**	**100%**

Vehicles owned with a proposed daily charge of £60 to enter or travel in the Clean Air Zone?

	Bus		Coach		HGV		HGV Leisure	
	N	%	N	%	N	%	N	%
Too much	32	86%	22	85%	79	76%	133	64%
About right	2	5%	0	0%	9	9%	43	21%
Too little	3	8%	2	8%	8	8%	8	4%
Don't know	0	0%	2	8%	8	8%	24	12%
Base	**37**	**100%**	**26**	**100%**	**104**	**100%**	**208**	**100%**

Vehicles owned with a proposed daily charge of £10 or below to enter or travel in the Clean Air Zone

	Minibus		Van/LGV		Private Hire Vehicle		Hackney Carriage	
	N	%	N	%	N	%	N	%
Too much	25	68%	301	64%	75	67%	65	76%
About right	6	16%	99	21%	22	20%	9	11%
Too little	3	8%	27	6%	6	5%	3	4%
Don't know	3	8%	40	9%	9	8%	8	9%
Base	**37**	**100%**	**467**	**100%**	**112**	**100%**	**85**	**100%**

HGV: Please tell us what you think of the proposed daily charges for each of the vehicles?

Respondent type

	General Public		Business		Taxi		Representatives	
	N	%	N	%	N	%	N	%
Too much	1171	40%	272	74%	137	73%	22	29%
About right	905	31%	51	14%	21	11%	28	36%
Too little	644	22%	18	5%	13	7%	20	26%
Don't know	223	8%	25	7%	17	9%	7	9%
Base	**2943**	**100%**	**366**	**100%**	**188**	**100%**	**77**	**100%**

Vehicles owned with a proposed daily charge of £60 to enter or travel in the Clean Air Zone?

	Bus		Coach		HGV		HGV Leisure	
	N	%	N	%	N	%	N	%
Too much	25	64%	15	60%	124	91%	201	80%
About right	7	18%	5	20%	5	4%	27	11%
Too little	4	10%	2	8%	5	4%	8	3%
Don't know	3	8%	3	12%	2	1%	15	6%
Base	**39**	**100%**	**25**	**100%**	**136**	**100%**	**251**	**100%**

Vehicles owned with a proposed daily charge of £10 or below to enter or travel in the Clean Air Zone

	Minibus		Van/LGV		Private Hire Vehicle		Hackney Carriage	
	N	%	N	%	N	%	N	%
Too much	24	65%	366	71%	82	67%	69	78%
About right	8	22%	89	17%	19	15%	7	8%
Too little	2	5%	26	5%	8	7%	7	8%
Don't know	3	8%	38	7%	14	11%	5	6%
Base	**37**	**100%**	**519**	**100%**	**123**	**100%**	**88**	**100%**

LGV: Please tell us what you think of the proposed daily charges for each of the vehicles?

Respondent type

	General Public		Business		Taxi		Representatives	
	N	%	N	%	N	%	N	%
Too much	1194	40%	293	75%	145	76%	31	37%
About right	979	33%	65	17%	28	15%	40	48%
Too little	622	21%	21	5%	6	3%	8	10%
Don't know	182	6%	14	4%	12	6%	4	5%
Base	**2977**	**100%**	**393**	**100%**	**191**	**100%**	**83**	**100%**

Vehicles owned with a proposed daily charge of £60 to enter or travel in the Clean Air Zone?

	Bus		Coach		HGV		HGV Leisure	
	N	%	N	%	N	%	N	%
Too much	13	34%	9	38%	85	66%	169	71%
About right	18	47%	10	42%	35	27%	45	19%
Too little	5	13%	3	13%	5	4%	8	3%
Don't know	2	5%	2	8%	3	2%	17	7%
Base	**38**	**100%**	**24**	**100%**	**128**	**100%**	**239**	**100%**

Vehicles owned with a proposed daily charge of £10 or below to enter or travel in the Clean Air Zone

	Minibus		Van/LGV		Private Hire Vehicle		Hackney Carriage	
	N	%	N	%	N	%	N	%
Too much	26	68%	476	82%	89	71%	72	81%
About right	10	26%	77	13%	26	21%	8	9%
Too little	1	3%	16	3%	4	3%	2	2%
Don't know	1	3%	11	2%	6	5%	7	8%
Base	**38**	**100%**	**580**	**100%**	**125**	**100%**	**89**	**100%**

Minibuses: Please tell us what you think of the proposed daily charges for each of the vehicles?

Respondent type

	General Public		Business		Taxi		Representatives	
	N	%	N	%	N	%	N	%
Too much	1126	38%	224	66%	162	81%	26	33%
About right	1114	38%	71	21%	21	10%	40	50%
Too little	498	17%	21	6%	7	3%	7	9%
Don't know	206	7%	23	7%	11	5%	7	9%
Base	**2944**	**100%**	**339**	**100%**	**201**	**100%**	**80**	**100%**

Vehicles owned with a proposed daily charge of £60 to enter or travel in the Clean Air Zone?

	Bus		Coach		HGV		HGV Leisure	
	N	%	N	%	N	%	N	%
Too much	17	45%	12	48%	63	59%	154	66%
About right	16	42%	8	32%	30	28%	50	22%
Too little	3	8%	3	12%	7	7%	9	4%
Don't know	2	5%	2	8%	7	7%	19	8%
Base	**38**	**100%**	**25**	**100%**	**107**	**100%**	**232**	**100%**

Vehicles owned with a proposed daily charge of £10 or below to enter or travel in the Clean Air Zone

	Minibus		Van/LGV		Private Hire Vehicle		Hackney Carriage	
	N	%	N	%	N	%	N	%
Too much	25	66%	348	69%	103	77%	76	82%
About right	10	26%	98	20%	20	15%	7	8%
Too little	1	3%	26	5%	3	2%	4	4%
Don't know	2	5%	30	6%	7	5%	6	6%
Base	**38**	**100%**	**502**	**100%**	**133**	**100%**	**93**	**100%**

Hackney: Please tell us what you think of the proposed daily charges for each of the vehicles?

Respondent type

	General Public		Business		Taxi		Representatives	
	N	%	N	%	N	%	N	%
Too much	1200	40%	216	62%	229	88%	25	31%
About right	990	33%	65	19%	15	6%	38	48%
Too little	566	19%	44	13%	5	2%	10	13%
Don't know	209	7%	23	7%	10	4%	7	9%
Base	**2965**	**100%**	**348**	**100%**	**259**	**100%**	**80**	**100%**

Vehicles owned with a proposed daily charge of £60 to enter or travel in the Clean Air Zone?

	Bus		Coach		HGV		HGV Leisure	
	N	%	N	%	N	%	N	%
Too much	16	44%	9	38%	56	51%	148	64%
About right	10	28%	6	25%	27	25%	48	21%
Too little	7	19%	4	17%	19	17%	17	7%
Don't know	3	8%	5	21%	7	6%	19	8%
Base	**36**	**100%**	**24**	**100%**	**109**	**100%**	**232**	**100%**

Vehicles owned with a proposed daily charge of £10 or below to enter or travel in the Clean Air Zone

	Minibus		Van/LGV		Private Hire Vehicle		Hackney Carriage	
	N	%	N	%	N	%	N	%
Too much	23	62%	317	63%	108	81%	148	93%
About right	6	16%	100	20%	14	11%	5	3%
Too little	5	14%	59	12%	3	2%	3	2%
Don't know	3	8%	29	6%	8	6%	3	2%
Base	**37**	**100%**	**505**	**100%**	**133**	**100%**	**159**	**100%**

Private hire vehicle: Please tell us what you think of the proposed daily charges for each of the vehicles?

Respondent type

	General Public		Business		Taxi		Representatives	
	N	%	N	%	N	%	N	%
Too much	1220	41%	215	63%	216	87%	27	34%
About right	969	33%	66	19%	19	8%	36	45%
Too little	592	20%	43	13%	8	3%	9	11%
Don't know	188	6%	20	6%	5	2%	8	10%
Base	**2969**	**100%**	**344**	**100%**	**248**	**100%**	**80**	**100%**

Vehicles owned with a proposed daily charge of £60 to enter or travel in the Clean Air Zone?

	Bus		Coach		HGV		HGV Leisure	
	N	%	N	%	N	%	N	%
Too much	17	46%	10	40%	57	53%	151	65%
About right	9	24%	5	20%	27	25%	46	20%
Too little	8	22%	6	24%	18	17%	16	7%
Don't know	3	8%	4	16%	5	5%	18	8%
Base	**37**	**100%**	**25**	**100%**	**107**	**100%**	**231**	**100%**

Vehicles owned with a proposed daily charge of £10 or below to enter or travel in the Clean Air Zone

	Minibus		Van/LGV		Private Hire Vehicle		Hackney Carriage	
	N	%	N	%	N	%	N	%
Too much	24	65%	327	65%	153	87%	85	86%
About right	6	16%	91	18%	15	9%	6	6%
Too little	4	11%	60	12%	2	1%	7	7%
Don't know	3	8%	26	5%	6	3%	1	1%
Base	**37**	**100%**	**504**	**100%**	**176**	**100%**	**99**	**100%**

To what extent do you agree or disagree with the permanent local exemptions proposed by Greater Manchester?

Respondent type

	General Public		Business		Taxi		Representatives	
	N	%	N	%	N	%	N	%
Strongly agree	1325	42%	183	45%	136	41%	42	49%
Slightly agree	716	23%	50	12%	23	7%	20	23%
Neither agree nor disagree	334	11%	63	15%	41	12%	11	13%
Slightly disagree	220	7%	21	5%	15	5%	4	5%
Strongly disagree	327	10%	49	12%	76	23%	3	3%
Don’t know	94	3%	20	5%	32	10%	1	1%
Not applicable	103	3%	24	6%	9	3%	5	6%
Base	**3119**	**100%**	**410**	**100%**	**332**	**100%**	**86**	**100%**

Vehicles owned with a proposed daily charge of £60 to enter or travel in the Clean Air Zone?

	Bus		Coach		HGV		HGV Leisure	
	N	%	N	%	N	%	N	%
Strongly agree	12	28%	8	30%	68	49%	116	44%
Slightly agree	7	16%	5	19%	17	12%	39	15%
Neither agree nor disagree	6	14%	6	22%	19	14%	29	11%
Slightly disagree	7	16%	4	15%	7	5%	8	3%
Strongly disagree	6	14%	3	11%	17	12%	47	18%
Don't know	1	2%	0	0%	5	4%	17	7%
Not applicable	4	9%	1	4%	7	5%	5	2%
Base	**43**	**100%**	**27**	**100%**	**140**	**100%**	**261**	**100%**

Vehicles owned with a proposed daily charge of £10 or below to enter or travel in the Clean Air Zone

	Minibus		Van/LGV		Private Hire Vehicle		Hackney Carriage	
	N	%	N	%	N	%	N	%
Strongly agree	15	38%	240	41%	74	37%	89	54%
Slightly agree	9	23%	77	13%	17	9%	8	5%
Neither agree nor disagree	8	20%	98	17%	18	9%	21	13%
Slightly disagree	4	10%	32	5%	11	6%	6	4%
Strongly disagree	1	3%	78	13%	53	27%	26	16%
Don't know	1	3%	31	5%	22	11%	9	5%
Not applicable	2	5%	35	6%	4	2%	6	4%
Base	**40**	**100%**	**591**	**100%**	**199**	**100%**	**165**	**100%**

To what extent do you agree or disagree with the temporary local exemptions proposed by Greater Manchester?

Respondent type

	General Public		Business		Taxi		Representatives	
	N	%	N	%	N	%	N	%
Strongly agree	1325	42%	183	45%	136	41%	42	49%
Slightly agree	716	23%	50	12%	23	7%	20	23%
Neither agree nor disagree	334	11%	63	15%	41	12%	11	13%
Slightly disagree	220	7%	21	5%	15	5%	4	5%
Strongly disagree	327	10%	49	12%	76	23%	3	3%
Don't know	94	3%	20	5%	32	10%	1	1%
Not applicable	103	3%	24	6%	9	3%	5	6%
Base	**3119**	**100%**	**410**	**100%**	**332**	**100%**	**86**	**100%**

Vehicles owned with a proposed daily charge of £60 to enter or travel in the Clean Air Zone?

	Bus		Coach		HGV		HGV Leisure	
	N	%	N	%	N	%	N	%
Strongly agree	18	43%	14	52%	62	45%	110	42%
Slightly agree	9	21%	4	15%	17	12%	33	13%
Neither agree nor disagree	4	10%	0	0%	17	12%	43	16%
Slightly disagree	1	2%	1	4%	10	7%	15	6%
Strongly disagree	5	12%	7	26%	24	17%	35	13%
Don't know	0	0%	0	0%	4	3%	14	5%
Not applicable	5	12%	1	4%	5	4%	11	4%
Base	**42**	**100%**	**27**	**100%**	**139**	**100%**	**261**	**100%**

Vehicles owned with a proposed daily charge of £10 or below to enter or travel in the Clean Air Zone

	Minibus		Van/LGV		Private Hire Vehicle		Hackney Carriage	
	N	%	N	%	N	%	N	%
Strongly agree	19	49%	291	49%	73	37%	58	36%
Slightly agree	8	21%	68	12%	20	10%	3	2%
Neither agree nor disagree	2	5%	77	13%	18	9%	13	8%
Slightly disagree	2	5%	25	4%	8	4%	4	2%
Strongly disagree	5	13%	86	15%	61	31%	63	39%
Don't know	2	5%	19	3%	12	6%	19	12%
Not applicable	1	3%	23	4%	4	2%	2	1%
Base	**39**	**100%**	**589**	**100%**	**196**	**100%**	**162**	**100%**

To what extent do you agree or disagree with the permanent local discounts proposed by Greater Manchester?

Respondent type

	General Public		Business		Taxi		Representatives	
	N	%	N	%	N	%	N	%
Strongly agree	819	26%	123	30%	122	37%	28	32%
Slightly agree	507	16%	44	11%	23	7%	19	22%
Neither agree nor disagree	432	14%	67	16%	31	9%	10	11%
Slightly disagree	370	12%	16	4%	14	4%	13	15%
Strongly disagree	671	22%	94	23%	82	25%	9	10%
Don't know	187	6%	36	9%	35	11%	3	3%
Not applicable	114	4%	31	8%	20	6%	5	6%
Base	**3100**	**100%**	**411**	**100%**	**327**	**100%**	**87**	**100%**

Vehicles owned with a proposed daily charge of £60 to enter or travel in the Clean Air Zone?

	Bus		Coach		HGV		HGV Leisure	
	N	%	N	%	N	%	N	%
Strongly agree	10	24%	5	19%	40	29%	135	52%
Slightly agree	5	12%	4	15%	14	10%	27	10%
Neither agree nor disagree	8	19%	4	15%	20	14%	37	14%
Slightly disagree	4	10%	3	11%	9	7%	6	2%
Strongly disagree	6	14%	5	19%	34	25%	33	13%
Don't know	5	12%	3	11%	7	5%	12	5%
Not applicable	4	10%	3	11%	14	10%	10	4%
Base	**42**	**100%**	**27**	**100%**	**138**	**100%**	**260**	**100%**

Vehicles owned with a proposed daily charge of £10 or below to enter or travel in the Clean Air Zone

	Minibus		Van/LGV		Private Hire Vehicle		Hackney Carriage	
	N	%	N	%	N	%	N	%
Strongly agree	18	46%	186	32%	82	41%	59	36%
Slightly agree	7	18%	70	12%	20	10%	8	5%
Neither agree nor disagree	5	13%	94	16%	19	10%	13	8%
Slightly disagree	4	10%	30	5%	6	3%	10	6%
Strongly disagree	3	8%	123	21%	45	23%	41	25%
Don't know	0	0%	45	8%	17	9%	21	13%
Not applicable	2	5%	40	7%	9	5%	10	6%
Base	**39**	**100%**	**588**	**100%**	**198**	**100%**	**162**	**100%**

CLEAN BUS FUND: Do you believe you are eligible to access this fund?

Respondent type

	General Public		Business		Taxi		Representatives	
	N	%	N	%	N	%	N	%
Yes	39	1%	37	9%	73	23%	7	8%
No	1716	56%	184	46%	74	23%	44	52%
Don't know	181	6%	45	11%	88	28%	4	5%
Not applicable	1149	37%	136	34%	85	27%	29	35%
Base	**3085**	**100%**	**402**	**100%**	**320**	**100%**	**84**	**100%**

Vehicles owned with a proposed daily charge of £60 to enter or travel in the Clean Air Zone?

	Bus		Coach		HGV		HGV Leisure	
	N	%	N	%	N	%	N	%
Yes	5	12%	4	15%	11	8%	6	2%
No	17	40%	17	63%	69	50%	148	58%
Don't know	5	12%	2	7%	16	12%	31	12%
Not applicable	16	37%	4	15%	43	31%	72	28%
Base	**43**	**100%**	**27**	**100%**	**139**	**100%**	**257**	**100%**

Vehicles owned with a proposed daily charge of £10 or below to enter or travel in the Clean Air Zone

	Minibus		Van/LGV		Private Hire Vehicle		Hackney Carriage	
	N	%	N	%	N	%	N	%
Yes	4	10%	26	5%	27	14%	56	35%
No	19	48%	302	53%	48	25%	27	17%
Don't know	6	15%	65	11%	65	34%	35	22%
Not applicable	11	28%	182	32%	54	28%	41	26%
Base	**40**	**100%**	**575**	**100%**	**194**	**100%**	**159**	**100%**

CLEAN BUS FUND: Would the proposed fund meet your needs e.g. support you to upgrade your vehicle(s)?

Respondent type

	General Public		Business		Taxi		Representatives	
	N	%	N	%	N	%	N	%
Yes	15	38%	7	19%	24	34%	1	14%
No	5	13%	6	16%	17	24%	1	14%
Don't know	19	49%	24	65%	30	42%	5	71%
Base	**39**	**100%**	**37**	**100%**	**71**	**100%**	**7**	**100%**

Vehicles owned with a proposed daily charge of £60 to enter or travel in the Clean Air Zone?

	Bus		Coach		HGV		HGV Leisure	
	N	%	N	%	N	%	N	%
Yes	3	60%	2	50%	5	45%	0	0%
No	0	0%	0	0%	3	27%	2	33%
Don't know	2	40%	2	50%	3	27%	4	67%
Base	**5**	**100%**	**4**	**100%**	**11**	**100%**	**6**	**100%**

Vehicles owned with a proposed daily charge of £10 or below to enter or travel in the Clean Air Zone

	Minibus		Van/LGV		Private Hire Vehicle		Hackney Carriage	
	N	%	N	%	N	%	N	%
Yes	1	25%	8	31%	9	36%	12	21%
No	1	25%	7	27%	5	20%	11	20%
Don't know	2	50%	11	42%	11	44%	33	59%
Base	**4**	**100%**	**26**	**100%**	**25**	**100%**	**56**	**100%**

CLEAN COMMERCIAL VEHICLE FUND: Do you believe you are eligible to access this fund?

Respondent type

	General Public		Business		Taxi		Representatives	
	N	%	N	%	N	%	N	%
Yes	73	2%	167	41%	72	22%	13	15%
No	1659	54%	106	26%	60	19%	37	43%
Don't know	195	6%	81	20%	115	36%	6	7%
Not applicable	1144	37%	55	13%	74	23%	31	36%
Base	**3071**	**100%**	**409**	**100%**	**321**	**100%**	**87**	**100%**

Vehicles owned with a proposed daily charge of £60 to enter or travel in the Clean Air Zone?

	Bus		Coach		HGV		HGV Leisure	
	N	%	N	%	N	%	N	%
Yes	2	5%	5	19%	38	27%	16	6%
No	17	41%	13	48%	53	38%	158	61%
Don't know	8	20%	4	15%	27	19%	34	13%
Not applicable	14	34%	5	19%	22	16%	49	19%
Base	**41**	**100%**	**27**	**100%**	**140**	**100%**	**257**	**100%**

Vehicles owned with a proposed daily charge of £10 or below to enter or travel in the Clean Air Zone

	Minibus		Van/LGV		Private Hire Vehicle		Hackney Carriage	
	N	%	N	%	N	%	N	%
Yes	10	26%	159	27%	35	18%	50	32%
No	10	26%	224	38%	40	21%	20	13%
Don't know	9	24%	112	19%	72	37%	54	34%
Not applicable	9	24%	87	15%	46	24%	34	22%
Base	**38**	**100%**	**582**	**100%**	**193**	**100%**	**158**	**100%**

CLEAN COMMERCIAL VEHICLE FUND: Would the proposed fund meet your needs e.g. support you to upgrade your vehicle(s)?

Respondent type

	General Public		Business		Taxi		Representatives	
	N	%	N	%	N	%	N	%
Yes	20	27%	27	16%	20	29%	5	38%
No	25	34%	48	29%	23	33%	3	23%
Don't know	28	38%	90	55%	26	38%	5	38%
Base	**73**	**100%**	**165**	**100%**	**69**	**100%**	**13**	**100%**

Vehicles owned with a proposed daily charge of £60 to enter or travel in the Clean Air Zone?

	Bus		Coach		HGV		HGV Leisure	
	N	%	N	%	N	%	N	%
Yes	1	50%	1	20%	10	26%	3	20%
No	0	0%	0	0%	12	32%	6	40%
Don't know	1	50%	4	80%	16	42%	6	40%
Base	**2**	**100%**	**5**	**100%**	**38**	**100%**	**15**	**100%**

Vehicles owned with a proposed daily charge of £10 or below to enter or travel in the Clean Air Zone

	Minibus		Van/LGV		Private Hire Vehicle		Hackney Carriage	
	N	%	N	%	N	%	N	%
Yes	4	40%	27	17%	10	30%	10	20%
No	3	30%	53	34%	10	30%	17	35%
Don't know	3	30%	77	49%	13	39%	22	45%
Base	**10**	**100%**	**157**	**100%**	**33**	**100%**	**49**	**100%**

CLEAN TAXI FUND: Do you believe you are eligible to access either of these funds?

Respondent type

	General Public		Business		Taxi		Representatives	
	N	%	N	%	N	%	N	%
Yes	16	1%	16	4%	169	51%	3	4%
No	1603	53%	151	40%	47	14%	39	46%
Don't know	91	3%	34	9%	92	28%	4	5%
Not applicable	1309	43%	176	47%	22	7%	39	46%
Base	**3019**	**100%**	**377**	**100%**	**330**	**100%**	**85**	**100%**

Vehicles owned with a proposed daily charge of £60 to enter or travel in the Clean Air Zone?

	Bus		Coach		HGV		HGV Leisure	
	N	%	N	%	N	%	N	%
Yes	0	0%	0	0%	3	2%	2	1%
No	11	28%	16	59%	50	38%	134	56%
Don't know	3	8%	2	7%	14	11%	14	6%
Not applicable	25	64%	9	33%	63	48%	89	37%
Base	**39**	**100%**	**27**	**100%**	**130**	**100%**	**239**	**100%**

Vehicles owned with a proposed daily charge of £10 or below to enter or travel in the Clean Air Zone

	Minibus		Van/LGV		Private Hire Vehicle		Hackney Carriage	
	N	%	N	%	N	%	N	%
Yes	3	8%	3	1%	81	41%	103	63%
No	11	29%	260	48%	31	16%	11	7%
Don't know	4	11%	34	6%	63	32%	40	24%
Not applicable	20	53%	250	46%	22	11%	10	6%
Base	**38**	**100%**	**547**	**100%**	**197**	**100%**	**164**	**100%**

CLEAN TAXI FUND: Would the proposed funds/'try before you buy' meet your needs e.g. support you to upgrade your vehicle(s)?

Respondent type

	General Public		Business		Taxi		Representatives	
	N	%	N	%	N	%	N	%
Yes	7	47%	4	25%	62	37%	0	0%
No	4	27%	1	6%	50	30%	1	33%
Don't know	4	27%	11	69%	55	33%	2	67%
Base	**15**	**100%**	**16**	**100%**	**167**	**100%**	**3**	**100%**

Vehicles owned with a proposed daily charge of £60 to enter or travel in the Clean Air Zone?

	Bus		Coach		HGV		HGV Leisure	
	N	%	N	%	N	%	N	%
Yes	0	0%	0	0%	3	100%	1	50%
No	0	0%	0	0%	0	0%	0	0%
Don't know	0	0%	0	0%	0	0%	1	50%
Base	**0**	**0%**	**0**	**0%**	**3**	**100%**	**2**	**100%**

Vehicles owned with a proposed daily charge of £10 or below to enter or travel in the Clean Air Zone

	Minibus		Van/LGV		Private Hire Vehicle		Hackney Carriage	
	N	%	N	%	N	%	N	%
Yes	2	67%	1	33%	41	51%	20	20%
No	0	0%	1	33%	16	20%	37	37%
Don't know	1	33%	1	33%	24	30%	44	44%
Base	**3**	**100%**	**3**	**100%**	**81**	**100%**	**101**	**100%**

To what extent do you agree or disagree that the proposed vehicle finance offer would meet your needs e.g. support you to upgrade your vehicle(s)?

Respondent type

	General Public		Business		Taxi		Representatives	
	N	%	N	%	N	%	N	%
Strongly agree	19	24%	33	20%	62	33%	2	13%
Slightly agree	6	8%	20	12%	19	10%	5	33%
Neither agree nor disagree	9	12%	26	16%	22	12%	1	7%
Slightly disagree	5	6%	8	5%	14	7%	0	0%
Strongly disagree	15	19%	35	21%	44	23%	3	20%
Don't know	12	15%	30	18%	27	14%	2	13%
Not applicable	12	15%	14	8%	2	1%	2	13%
Base	**78**	**100%**	**166**	**100%**	**190**	**100%**	**15**	**100%**

Vehicles owned with a proposed daily charge of £60 to enter or travel in the Clean Air Zone?

	Bus		Coach		HGV		HGV Leisure	
	N	%	N	%	N	%	N	%
Strongly agree	0	0%	2	40%	9	24%	5	31%
Slightly agree	1	50%	1	20%	8	22%	0	0%
Neither agree nor disagree	1	50%	1	20%	2	5%	3	19%
Slightly disagree	0	0%	0	0%	1	3%	0	0%
Strongly disagree	0	0%	0	0%	7	19%	4	25%
Don't know	0	0%	1	20%	7	19%	2	13%
Not applicable	0	0%	0	0%	3	8%	2	13%
Base	**2**	**100%**	**5**	**100%**	**37**	**100%**	**16**	**100%**

Vehicles owned with a proposed daily charge of £10 or below to enter or travel in the Clean Air Zone

	Minibus		Van/LGV		Private Hire Vehicle		Hackney Carriage	
	N	%	N	%	N	%	N	%
Strongly agree	0	0%	29	18%	34	37%	27	23%
Slightly agree	2	18%	22	14%	10	11%	10	9%
Neither agree nor disagree	1	9%	25	16%	14	15%	9	8%
Slightly disagree	1	9%	9	6%	7	8%	8	7%
Strongly disagree	2	18%	37	24%	15	16%	32	28%
Don't know	4	36%	22	14%	11	12%	24	21%
Not applicable	1	9%	13	8%	0	0%	6	5%
Base	**11**	**100%**	**157**	**100%**	**91**	**100%**	**116**	**100%**

Do you support a hardship fund?

Respondent type

	General Public		Business		Taxi		Representatives	
	N	%	N	%	N	%	N	%
Yes	2000	66%	303	75%	222	67%	72	84%
No	575	19%	43	11%	34	10%	8	9%
Don't know	470	15%	59	15%	74	22%	6	7%
Base	**3045**	**100%**	**405**	**100%**	**330**	**100%**	**86**	**100%**

Vehicles owned with a proposed daily charge of £60 to enter or travel in the Clean Air Zone?

	Bus		Coach		HGV		HGV Leisure	
	N	%	N	%	N	%	N	%
Yes	26	65%	19	73%	95	68%	166	66%
No	9	23%	3	12%	23	17%	36	14%
Don't know	5	13%	4	15%	21	15%	48	19%
Base	**40**	**100%**	**26**	**100%**	**139**	**100%**	**250**	**100%**

Vehicles owned with a proposed daily charge of £10 or below to enter or travel in the Clean Air Zone

	Minibus		Van/LGV		Private Hire Vehicle		Hackney Carriage	
	N	%	N	%	N	%	N	%
Yes	34	89%	399	70%	117	60%	138	84%
No	3	8%	80	14%	22	11%	7	4%
Don't know	1	3%	89	16%	57	29%	20	12%
Base	**38**	**100%**	**568**	**100%**	**196**	**100%**	**165**	**100%**

To what extent do you agree or disagree that air quality needs to be improved in Greater Manchester?

Respondent type

	General Public		Business		Taxi		Representatives	
	N	%	N	%	N	%	N	%
Strongly agree	1833	59%	130	31%	87	26%	60	71%
Slightly agree	473	15%	82	20%	36	11%	8	9%
Neither agree nor disagree	353	11%	85	21%	73	22%	5	6%
Slightly disagree	121	4%	23	6%	19	6%	3	4%
Strongly disagree	302	10%	77	19%	91	28%	7	8%
Don’t know	31	1%	16	4%	24	7%	2	2%
Base	**3113**	**100%**	**413**	**100%**	**330**	**100%**	**85**	**100%**

Vehicles owned with a proposed daily charge of £60 to enter or travel in the Clean Air Zone?

	Bus		Coach		HGV		HGV Leisure	
	N	%	N	%	N	%	N	%
Strongly agree	18	43%	12	44%	35	25%	53	21%
Slightly agree	10	24%	6	22%	30	21%	76	29%
Neither agree nor disagree	5	12%	4	15%	40	28%	72	28%
Slightly disagree	2	5%	2	7%	7	5%	20	8%
Strongly disagree	5	12%	1	4%	23	16%	33	13%
Don't know	2	5%	2	7%	6	4%	4	2%
Base	**42**	**100%**	**27**	**100%**	**141**	**100%**	**258**	**100%**

Vehicles owned with a proposed daily charge of £10 or below to enter or travel in the Clean Air Zone

	Minibus		Van/LGV		Private Hire Vehicle		Hackney Carriage	
	N	%	N	%	N	%	N	%
Strongly agree	17	44%	173	29%	64	32%	27	16%
Slightly agree	9	23%	137	23%	26	13%	17	10%
Neither agree nor disagree	6	15%	131	22%	37	19%	37	22%
Slightly disagree	1	3%	33	6%	9	5%	12	7%
Strongly disagree	3	8%	101	17%	49	25%	57	35%
Don't know	3	8%	12	2%	12	6%	15	9%
Base	**39**	**100%**	**587**	**100%**	**197**	**100%**	**165**	**100%**

How confident are you that the Greater Manchester Clean Air Plan would bring roadside nitrogen dioxide (NO2) levels within legal limits in the shortest possible time?

Respondent type

	General Public		Business		Taxi		Representatives	
	N	%	N	%	N	%	N	%
Very confident	146	5%	19	5%	28	8%	9	10%
Fairly confident	931	30%	66	16%	50	15%	24	28%
Neither	456	15%	73	18%	58	18%	10	12%
Fairly unconfident	554	18%	70	17%	42	13%	15	17%
Very unconfident	717	23%	126	31%	80	24%	19	22%
Don't know	272	9%	53	13%	50	15%	6	7%
Prefer not to say	43	1%	5	1%	23	7%	3	3%
Base	**3119**	**100%**	**412**	**100%**	**331**	**100%**	**86**	**100%**

Vehicles owned with a proposed daily charge of £60 to enter or travel in the Clean Air Zone?

	Bus		Coach		HGV		HGV Leisure	
	N	%	N	%	N	%	N	%
Very confident	4	10%	2	7%	4	3%	2	1%
Fairly confident	11	26%	5	19%	34	24%	27	10%
Neither	6	14%	5	19%	27	19%	54	21%
Fairly unconfident	5	12%	3	11%	23	16%	54	21%
Very unconfident	12	29%	9	33%	42	30%	75	29%
Don't know	4	10%	3	11%	10	7%	39	15%
Prefer not to say	0	0%	0	0%	2	1%	8	3%
Base	**42**	**100%**	**27**	**100%**	**142**	**100%**	**259**	**100%**

Vehicles owned with a proposed daily charge of £10 or below to enter or travel in the Clean Air Zone

	Minibus		Van/LGV		Private Hire Vehicle		Hackney Carriage	
	N	%	N	%	N	%	N	%
Very confident	3	8%	21	4%	20	10%	9	5%
Fairly confident	8	21%	78	13%	43	22%	13	8%
Neither	8	21%	99	17%	25	13%	37	23%
Fairly unconfident	5	13%	112	19%	23	12%	19	12%
Very unconfident	8	21%	215	37%	52	26%	33	20%
Don't know	7	18%	57	10%	27	14%	39	24%
Prefer not to say	0	0%	6	1%	8	4%	14	9%
Base	**39**	**100%**	**588**	**100%**	**198**	**100%**	**164**	**100%**

Which of the following best reflects your trading status as a result of the Covid-19 pandemic?

Respondent type

	General Public		Business		Taxi		Representatives	
	N	%	N	%	N	%	N	%
Have continued trading throughout	0	0%	164	40%	43	13%	12	27%
Currently trading, having temporarily paused - but have resumed trading during the pandemic	0	0%	192	47%	167	52%	8	18%
Paused trading	0	0%	49	12%	99	31%	12	27%
Permanently ceased trading	0	0%	1	0%	4	1%	0	0%
Other, please specify	0	0%	5	1%	11	3%	12	27%
Base	**0**	**0%**	**411**	**100%**	**324**	**100%**	**44**	**100%**

Vehicles owned with a proposed daily charge of £60 to enter or travel in the Clean Air Zone?

	Bus		Coach		HGV		HGV Leisure	
	N	%	N	%	N	%	N	%
Have continued trading throughout	9	50%	5	22%	62	57%	9	32%
Currently trading, having temporarily paused - but have resumed trading during the pandemic	4	22%	12	52%	34	31%	9	32%
Paused trading	4	22%	5	22%	9	8%	9	32%
Permanently ceased trading	1	6%	1	4%	1	1%	1	4%
Other, please specify	0	0%	0	0%	2	2%	0	0%
Base	**18**	**100%**	**23**	**100%**	**108**	**100%**	**28**	**100%**

Vehicles owned with a proposed daily charge of £10 or below to enter or travel in the Clean Air Zone

	Minibus		Van/LGV		Private Hire Vehicle		Hackney Carriage	
	N	%	N	%	N	%	N	%
Have continued trading throughout	11	44%	108	37%	30	17%	13	8%
Currently trading, having temporarily paused - but have resumed trading during the pandemic	10	40%	147	50%	92	51%	92	57%
Paused trading	2	8%	33	11%	53	29%	46	29%
Permanently ceased trading	1	4%	1	0%	1	1%	5	3%
Other, please specify	1	4%	6	2%	4	2%	5	3%
Base	**25**	**100%**	**295**	**100%**	**180**	**100%**	**161**	**100%**

Have you or your business received any of the following as a result of the Covid-19 pandemic?

Respondent type

	General Public		Business		Taxi		Representatives	
	N	%	N	%	N	%	N	%
Job Retention Scheme	0	0%	147	38%	29	9%	12	29%
Government-backed accredited loans or finance agreements	0	0%	101	26%	25	8%	2	5%
Business grants funded by the UK and devolved governments	0	0%	59	15%	14	5%	8	20%
Self-employment income support scheme	0	0%	104	27%	201	65%	5	12%
Other government support	0	0%	14	4%	31	10%	4	10%
Other loans or grants	0	0%	15	4%	5	2%	5	12%
Not applied for any of these schemes	0	0%	87	23%	45	15%	20	49%
Base	**0**	**0%**	**384**	**100%**	**310**	**100%**	**41**	**100%**

Vehicles owned with a proposed daily charge of £60 to enter or travel in the Clean Air Zone?

	Bus		Coach		HGV		HGV Leisure	
	N	%	N	%	N	%	N	%
Job Retention Scheme	12	71%	5	25%	5	21%	18	82%
Government-backed accredited loans or finance agreements	6	35%	3	15%	5	21%	13	59%
Business grants funded by the UK and devolved governments	4	24%	2	10%	1	4%	3	14%
Self-employment income support scheme	2	12%	3	15%	5	21%	3	14%
Other government support	3	18%	3	15%	2	8%	0	0%
Other loans or grants	1	6%	3	15%	1	4%	0	0%
Not applied for any of these schemes	0	0%	8	40%	11	46%	1	5%
Base	**17**	**100%**	**20**	**100%**	**24**	**100%**	**22**	**100%**

Vehicles owned with a proposed daily charge of £10 or below to enter or travel in the Clean Air Zone

	Minibus		Van/LGV		Private Hire Vehicle		Hackney Carriage	
	N	%	N	%	N	%	N	%
Job Retention Scheme	4	17%	16	73%	113	40%	61	60%
Government-backed accredited loans or finance agreements	2	9%	2	9%	79	28%	36	35%
Business grants funded by the UK and devolved governments	3	13%	5	23%	46	16%	13	13%
Self-employment income support scheme	3	13%	4	18%	72	25%	14	14%
Other government support	1	4%	3	14%	10	4%	5	5%
Other loans or grants	0	0%	3	14%	14	5%	5	5%
Not applied for any of these schemes	12	52%	2	9%	62	22%	15	15%
Base	**23**	**100%**	**22**	**100%**	**283**	**100%**	**102**	**100%**

Level of debt: Please tell us how the Covid-19 pandemic has affected the following aspects of your business

Respondent type

	General Public		Business		Taxi		Representatives	
	N	%	N	%	N	%	N	%
A lot less than before	0	0%	8	2%	44	14%	1	2%
Less than before	0	0%	12	3%	4	1%	0	0%
Same as before	0	0%	97	25%	27	9%	9	21%
More than before	0	0%	87	23%	53	17%	5	12%
A lot more than before	0	0%	100	26%	137	44%	10	24%
Not applicable	0	0%	48	12%	15	5%	14	33%
Don't know	0	0%	5	1%	9	3%	1	2%
Prefer not to say	0	0%	28	7%	25	8%	2	5%
Base	**0**	**0%**	**385**	**100%**	**314**	**100%**	**42**	**100%**

Vehicles owned with a proposed daily charge of £60 to enter or travel in the Clean Air Zone?

	Bus		Coach		HGV		HGV Leisure	
	N	%	N	%	N	%	N	%
A lot less than before	1	6%	0	0%	4	4%	2	7%
Less than before	0	0%	0	0%	2	2%	0	0%
Same as before	6	35%	4	18%	24	23%	4	14%
More than before	1	6%	1	5%	24	23%	6	21%
A lot more than before	4	24%	12	55%	30	29%	7	25%
Not applicable	2	12%	4	18%	8	8%	5	18%
Don't know	1	6%	1	5%	2	2%	0	0%
Prefer not to say	2	12%	0	0%	11	10%	4	14%
Base	**17**	**100%**	**22**	**100%**	**105**	**100%**	**28**	**100%**

Vehicles owned with a proposed daily charge of £10 or below to enter or travel in the Clean Air Zone

	Minibus		Van/LGV		Private Hire Vehicle		Hackney Carriage	
	N	%	N	%	N	%	N	%
A lot less than before	0	0%	7	2%	25	14%	17	12%
Less than before	1	4%	7	2%	3	2%	1	1%
Same as before	7	29%	71	25%	14	8%	13	9%
More than before	2	8%	61	21%	37	21%	22	15%
A lot more than before	5	21%	80	28%	60	35%	76	53%
Not applicable	3	13%	34	12%	12	7%	6	4%
Don't know	1	4%	7	2%	6	3%	2	1%
Prefer not to say	5	21%	20	7%	16	9%	6	4%
Base	**24**	**100%**	**287**	**100%**	**173**	**100%**	**143**	**100%**

Reserves/Savings: Please tell us how the Covid-19 pandemic has affected the following aspects of your business

Respondent type

	General Public		Business		Taxi		Representatives	
	N	%	N	%	N	%	N	%
A lot less than before	0	0%	122	34%	131	55%	9	22%
Less than before	0	0%	110	31%	42	18%	7	17%
Same as before	0	0%	53	15%	8	3%	8	20%
More than before	0	0%	12	3%	8	3%	1	2%
A lot more than before	0	0%	16	4%	19	8%	1	2%
Not applicable	0	0%	19	5%	12	5%	12	29%
Don't know	0	0%	4	1%	4	2%	1	2%
Prefer not to say	0	0%	21	6%	14	6%	2	5%
Base	**0**	**0%**	**357**	**100%**	**238**	**100%**	**41**	**100%**

Vehicles owned with a proposed daily charge of £60 to enter or travel in the Clean Air Zone?

	Bus		Coach		HGV		HGV Leisure	
	N	%	N	%	N	%	N	%
A lot less than before	5	31%	10	50%	31	31%	8	32%
Less than before	4	25%	5	25%	29	29%	5	20%
Same as before	3	19%	1	5%	19	19%	5	20%
More than before	0	0%	0	0%	0	0%	0	0%
A lot more than before	0	0%	1	5%	6	6%	1	4%
Not applicable	1	6%	2	10%	4	4%	3	12%
Don't know	1	6%	1	5%	3	3%	0	0%
Prefer not to say	2	13%	0	0%	8	8%	3	12%
Base	**16**	**100%**	**20**	**100%**	**100**	**100%**	**25**	**100%**

Vehicles owned with a proposed daily charge of £10 or below to enter or travel in the Clean Air Zone

	Minibus		Van/LGV		Private Hire Vehicle		Hackney Carriage	
	N	%	N	%	N	%	N	%
A lot less than before	8	35%	90	34%	68	50%	68	61%
Less than before	4	17%	77	29%	29	21%	12	11%
Same as before	5	22%	42	16%	5	4%	5	4%
More than before	0	0%	9	3%	4	3%	4	4%
A lot more than before	0	0%	11	4%	11	8%	10	9%
Not applicable	1	4%	14	5%	7	5%	6	5%
Don't know	1	4%	5	2%	2	1%	2	2%
Prefer not to say	4	17%	15	6%	9	7%	5	4%
Base	**23**	**100%**	**263**	**100%**	**135**	**100%**	**112**	**100%**

Turnover: Please tell us how the Covid-19 pandemic has affected the following aspects of your business

Respondent type

	General Public		Business		Taxi		Representatives	
	N	%	N	%	N	%	N	%
A lot less than before	0	0%	155	42%	195	76%	13	31%
Less than before	0	0%	121	33%	26	10%	7	17%
Same as before	0	0%	33	9%	1	0%	4	10%
More than before	0	0%	18	5%	6	2%	3	7%
A lot more than before	0	0%	17	5%	14	5%	0	0%
Not applicable	0	0%	8	2%	1	0%	13	31%
Don't know	0	0%	4	1%	3	1%	0	0%
Prefer not to say	0	0%	15	4%	11	4%	2	5%
Base	**0**	**0%**	**371**	**100%**	**257**	**100%**	**42**	**100%**

Vehicles owned with a proposed daily charge of £60 to enter or travel in the Clean Air Zone?

	Bus		Coach		HGV		HGV Leisure	
	N	%	N	%	N	%	N	%
A lot less than before	15	83%	18	86%	36	36%	10	40%
Less than before	2	11%	0	0%	34	34%	6	24%
Same as before	0	0%	0	0%	8	8%	4	16%
More than before	0	0%	0	0%	4	4%	0	0%
A lot more than before	1	6%	2	10%	6	6%	1	4%
Not applicable	0	0%	1	5%	3	3%	2	8%
Don't know	0	0%	0	0%	1	1%	0	0%
Prefer not to say	0	0%	0	0%	7	7%	2	8%
Base	**18**	**100%**	**21**	**100%**	**99**	**100%**	**25**	**100%**

Vehicles owned with a proposed daily charge of £10 or below to enter or travel in the Clean Air Zone

	Minibus		Van/LGV		Private Hire Vehicle		Hackney Carriage	
	N	%	N	%	N	%	N	%
A lot less than before	12	50%	111	41%	100	71%	99	80%
Less than before	8	33%	93	34%	16	11%	10	8%
Same as before	1	4%	22	8%	1	1%	0	0%
More than before	0	0%	14	5%	5	4%	2	2%
A lot more than before	0	0%	13	5%	7	5%	8	6%
Not applicable	1	4%	7	3%	2	1%	0	0%
Don't know	0	0%	5	2%	2	1%	1	1%
Prefer not to say	2	8%	9	3%	7	5%	4	3%
Base	**24**	**100%**	**274**	**100%**	**140**	**100%**	**124**	**100%**

Profitability: Please tell us how the Covid-19 pandemic has affected the following aspects of your business

Respondent type

	General Public		Business		Taxi		Representatives	
	N	%	N	%	N	%	N	%
A lot less than before	0	0%	150	41%	198	79%	13	31%
Less than before	0	0%	118	32%	23	9%	4	10%
Same as before	0	0%	43	12%	2	1%	8	19%
More than before	0	0%	13	4%	4	2%	0	0%
A lot more than before	0	0%	12	3%	14	6%	0	0%
Not applicable	0	0%	11	3%	1	0%	14	33%
Don't know	0	0%	4	1%	3	1%	1	2%
Prefer not to say	0	0%	16	4%	6	2%	2	5%
Base	**0**	**0%**	**367**	**100%**	**251**	**100%**	**42**	**100%**

Vehicles owned with a proposed daily charge of £60 to enter or travel in the Clean Air Zone?

	Bus		Coach		HGV		HGV Leisure	
	N	%	N	%	N	%	N	%
A lot less than before	14	82%	18	86%	32	32%	12	46%
Less than before	2	12%	1	5%	38	38%	7	27%
Same as before	0	0%	0	0%	9	9%	1	4%
More than before	0	0%	0	0%	3	3%	0	0%
A lot more than before	0	0%	1	5%	6	6%	1	4%
Not applicable	0	0%	1	5%	3	3%	3	12%
Don't know	0	0%	0	0%	2	2%	0	0%
Prefer not to say	1	6%	0	0%	7	7%	2	8%
Base	**17**	**100%**	**21**	**100%**	**100**	**100%**	**26**	**100%**

Vehicles owned with a proposed daily charge of £10 or below to enter or travel in the Clean Air Zone

	Minibus		Van/LGV		Private Hire Vehicle		Hackney Carriage	
	N	%	N	%	N	%	N	%
A lot less than before	13	54%	107	40%	104	76%	99	81%
Less than before	5	21%	90	33%	13	10%	10	8%
Same as before	2	8%	31	11%	2	1%	0	0%
More than before	0	0%	9	3%	4	3%	1	1%
A lot more than before	0	0%	9	3%	8	6%	6	5%
Not applicable	1	4%	9	3%	1	1%	1	1%
Don't know	0	0%	6	2%	1	1%	2	2%
Prefer not to say	3	13%	9	3%	3	2%	3	2%
Base	**24**	**100%**	**270**	**100%**	**136**	**100%**	**122**	**100%**

Where is your business, charity or organisation registered?

Respondent type

	General Public		Business		Taxi		Representatives	
	N	%	N	%	N	%	N	%
Bolton	0	0%	38	9%	47	15%	5	7%
Bury	0	0%	30	7%	14	4%	7	9%
Manchester	0	0%	71	16%	91	29%	21	28%
Oldham	0	0%	40	9%	41	13%	8	11%
Rochdale	0	0%	21	5%	31	10%	7	9%
Salford	0	0%	34	8%	16	5%	9	12%
Stockport	0	0%	49	11%	25	8%	7	9%
Tameside	0	0%	34	8%	20	6%	3	4%
Trafford	0	0%	42	10%	14	4%	8	11%
Wigan	0	0%	55	13%	32	10%	5	7%
Outside Greater Manchester	0	0%	77	18%	12	4%	22	29%
Don't Know	0	0%	6	1%	0	0%	5	7%
Base	**0**	**0%**	**435**	**100%**	**318**	**100%**	**76**	**100%**

Vehicles owned with a proposed daily charge of £60 to enter or travel in the Clean Air Zone?

	Bus		Coach		HGV		HGV Leisure	
	N	%	N	%	N	%	N	%
Bolton	1	6%	2	9%	5	17%	1	4%
Bury	1	6%	3	14%	3	10%	2	9%
Manchester	3	17%	7	32%	4	14%	2	9%
Oldham	2	11%	6	27%	6	21%	3	13%
Rochdale	1	6%	5	23%	4	14%	2	9%
Salford	2	11%	5	23%	2	7%	4	17%
Stockport	2	11%	3	14%	7	24%	2	9%
Tameside	2	11%	3	14%	4	14%	2	9%
Trafford	1	6%	4	18%	2	7%	1	4%
Wigan	1	6%	5	23%	5	17%	1	4%
Outside Greater Manchester	12	67%	3	14%	9	31%	15	65%
Base	**18**	**100%**	**22**	**100%**	**29**	**100%**	**23**	**100%**

Vehicles owned with a proposed daily charge of £10 or below to enter or travel in the Clean Air Zone

	Minibus		Van/LGV		Private Hire Vehicle		Hackney Carriage	
	N	%	N	%	N	%	N	%
Bolton	3	13%	2	8%	28	9%	11	10%
Bury	2	8%	3	12%	19	6%	9	8%
Manchester	9	38%	6	23%	48	16%	13	12%
Oldham	2	8%	6	23%	24	8%	10	9%
Rochdale	3	13%	3	12%	19	6%	10	9%
Salford	2	8%	4	15%	28	9%	7	6%
Stockport	5	21%	3	12%	35	12%	10	9%
Tameside	1	4%	1	4%	29	10%	4	4%
Trafford	4	17%	2	8%	29	10%	8	7%
Wigan	3	13%	3	12%	43	14%	14	13%
Outside Greater Manchester	7	29%	10	38%	50	17%	35	32%
Base	**24**	**100%**	**26**	**100%**	**300**	**100%**	**108**	**100%**

What Sector does your business fall into?

Respondent type

	General Public		Business		Taxi		Representatives	
	N	%	N	%	N	%	N	%
Agriculture, forestry & fishing	0	0%	25	6%	0	0%	0	0%
Information & communication	0	0%	12	3%	0	0%	0	0%
Mining, quarrying & utilities	0	0%	4	1%	0	0%	0	0%
Financial & insurance	0	0%	6	2%	0	0%	0	0%
Manufacturing	0	0%	23	6%	0	0%	0	0%
Property	0	0%	16	4%	0	0%	0	0%
Construction	0	0%	83	21%	0	0%	0	0%
Professional, scientific & technical	0	0%	16	4%	0	0%	0	0%
Motor trades	0	0%	36	9%	0	0%	0	0%
Business administration & support services	0	0%	7	2%	0	0%	0	0%
Wholesale	0	0%	13	3%	0	0%	0	0%
Public administration & defence	0	0%	1	0%	0	0%	0	0%
Retail	0	0%	24	6%	0	0%	0	0%
Education	0	0%	4	1%	0	0%	0	0%
Transport & storage	0	0%	83	21%	0	0%	0	0%
Health	0	0%	5	1%	0	0%	0	0%
Accommodation & food services	0	0%	5	1%	0	0%	0	0%
Arts, entertainment, recreation & other	0	0%	34	9%	0	0%	0	0%
Base	**0**	**0%**	**397**	**100%**	**0**	**0%**	**0**	**0%**

Vehicles owned with a proposed daily charge of £60 to enter or travel in the Clean Air Zone?

	Bus		Coach		HGV		HGV Leisure	
	N	%	N	%	N	%	N	%
Agriculture, forestry & fishing	0	0%	0	0%	7	7%	4	19%
Information & communication	1	7%	1	8%	2	2%	1	5%
Mining, quarrying & utilities	0	0%	0	0%	2	2%	1	5%
Financial & insurance	0	0%	0	0%	0	0%	0	0%
Manufacturing	0	0%	0	0%	9	9%	0	0%
Property	0	0%	0	0%	0	0%	0	0%
Construction	0	0%	0	0%	9	9%	3	14%
Professional, scientific & technical	0	0%	0	0%	0	0%	1	5%
Motor trades	0	0%	0	0%	17	17%	4	19%
Business administration & support services	0	0%	0	0%	0	0%	0	0%
Wholesale	0	0%	0	0%	6	6%	0	0%
Public administration & defence	0	0%	0	0%	0	0%	0	0%
Retail	0	0%	0	0%	3	3%	2	10%
Education	0	0%	0	0%	1	1%	0	0%
Transport & storage	13	93%	11	85%	43	42%	4	19%
Health	0	0%	0	0%	0	0%	0	0%
Accommodation & food services	0	0%	0	0%	1	1%	0	0%
Arts, entertainment, recreation & other	0	0%	1	8%	2	2%	1	5%
Base	**14**	**100%**	**13**	**100%**	**102**	**100%**	**21**	**100%**

Vehicles owned with a proposed daily charge of £10 or below to enter or travel in the Clean Air Zone

	Minibus		Van/LGV		Private Hire Vehicle		Hackney Carriage	
	N	%	N	%	N	%	N	%
Agriculture, forestry & fishing	0	0%	21	8%	0	0%	0	0%
Information & communication	1	7%	5	2%	1	8%	1	20%
Mining, quarrying & utilities	0	0%	3	1%	0	0%	0	0%
Financial & insurance	0	0%	1	0%	0	0%	0	0%
Manufacturing	1	7%	20	7%	0	0%	0	0%
Property	0	0%	14	5%	0	0%	0	0%
Construction	0	0%	75	27%	1	8%	0	0%
Professional, scientific & technical	0	0%	8	3%	0	0%	0	0%
Motor trades	2	14%	27	10%	2	17%	4	80%
Business administration & support services	0	0%	2	1%	0	0%	0	0%
Wholesale	0	0%	10	4%	0	0%	0	0%
Public administration & defence	0	0%	1	0%	0	0%	0	0%
Retail	0	0%	19	7%	0	0%	0	0%
Education	0	0%	0	0%	0	0%	0	0%
Transport & storage	10	71%	49	18%	8	67%	0	0%
Health	0	0%	2	1%	0	0%	0	0%
Accommodation & food services	0	0%	2	1%	0	0%	0	0%
Arts, entertainment, recreation & other	0	0%	20	7%	0	0%	0	0%
Base	**14**	**100%**	**279**	**100%**	**12**	**100%**	**5**	**100%**

What is the size of your business?

Respondent type

	General Public		Business		Taxi		Representatives	
	N	%	N	%	N	%	N	%
Sole trader/self-employed (1 person)	0	0%	177	42%	0	0%	0	0%
Micro business (2-9 employees)	0	0%	128	30%	0	0%	0	0%
Small business (10-49 employees)	0	0%	65	15%	0	0%	0	0%
Medium business (50-249 employees)	0	0%	38	9%	0	0%	0	0%
Large business (250+ employees)	0	0%	14	3%	0	0%	0	0%
Base	**0**	**0%**	**422**	**100%**	**0**	**0%**	**0**	**0%**

Vehicles owned with a proposed daily charge of £60 to enter or travel in the Clean Air Zone?

	Bus		Coach		HGV		HGV Leisure	
	N	%	N	%	N	%	N	%
Sole trader/self-employed (1 person)	2	13%	0	0%	13	13%	9	39%
Micro business (2-9 employees)	1	7%	3	23%	31	30%	6	26%
Small business (10-49 employees)	4	27%	7	54%	26	25%	6	26%
Medium business (50-249 employees)	6	40%	3	23%	23	23%	2	9%
Large business (250+ employees)	2	13%	0	0%	9	9%	0	0%
Base	**15**	**100%**	**13**	**100%**	**102**	**100%**	**23**	**100%**

Vehicles owned with a proposed daily charge of £10 or below to enter or travel in the Clean Air Zone

	Minibus		Van/LGV		Private Hire Vehicle		Hackney Carriage	
	N	%	N	%	N	%	N	%
Sole trader/self-employed (1 person)	0	0%	109	39%	4	31%	15	83%
Micro business (2-9 employees)	2	13%	96	34%	2	15%	1	6%
Small business (10-49 employees)	4	27%	41	14%	4	31%	1	6%
Medium business (50-249 employees)	5	33%	26	9%	3	23%	1	6%
Large business (250+ employees)	4	27%	11	4%	0	0%	0	0%
Base	**15**	**100%**	**283**	**100%**	**13**	**100%**	**18**	**100%**

Are you a...

Respondent type

	General Public		Business		Taxi		Representatives	
	N	%	N	%	N	%	N	%
Licensed hackney driver – own vehicle	0	0%		0%	128	39%	0	0%
Licensed hackney driver – rent a licensed vehicle that is kept at my home address	0	0%	0	0%	13	4%	0	0%
Licensed hackney driver – rent a licensed vehicle that is not kept at my home address	0	0%	0	0%	3	1%	0	0%
Licensed private hire driver – own vehicle	0	0%	0	0%	152	46%	0	0%
Licensed private hire driver – rent a licensed vehicle that is kept at my home address	0	0%	0	0%	10	3%	0	0%
Licensed private hire driver – rent a licensed vehicle that is not kept at my home address	0	0%	0	0%	2	1%	0	0%
Private hire operator	0	0%	0	0%	22	7%	0	0%
Base	**0**	**0%**	**0**	**0%**	**330**	**100%**	**0**	**0%**

Vehicles owned with a proposed daily charge of £60 to enter or travel in the Clean Air Zone?

	Bus		Coach		HGV		HGV Leisure	
	N	%	N	%	N	%	N	%
Licensed hackney driver – own vehicle	0	0%	0	0%	0	0%	1	50%
Licensed hackney driver – rent a licensed vehicle that is kept at my home address	0	0%	0	0%	0	0%	0	0%
Licensed hackney driver – rent a licensed vehicle that is not kept at my home address	0	0%	0	0%	0	0%	0	0%
Licensed private hire driver – own vehicle	1	25%	0	0%	2	100%	0	0%
Licensed private hire driver – rent a licensed vehicle that is kept at my home address	0	0%	0	0%	0	0%	0	0%
Licensed private hire driver – rent a licensed vehicle that is not kept at my home address	0	0%	0	0%	0	0%	0	0%
Private hire operator	3	75%	9	100%	0	0%	1	50%
Base	**4**	**100%**	**9**	**100%**	**2**	**100%**	**2**	**100%**

Vehicles owned with a proposed daily charge of £10 or below to enter or travel in the Clean Air Zone

	Minibus		Van/LGV		Private Hire Vehicle		Hackney Carriage	
	N	%	N	%	N	%	N	%
Licensed hackney driver – own vehicle	0	0%	1	33%	4	2%	125	89%
Licensed hackney driver – rent a licensed vehicle that is kept at my home address	0	0%	0	0%	1	1%	12	9%
Licensed hackney driver – rent a licensed vehicle that is not kept at my home address	0	0%	0	0%	0	0%	2	1%
Licensed private hire driver – own vehicle	1	33%	0	0%	148	87%	1	1%
Licensed private hire driver – rent a licensed vehicle that is kept at my home address	0	0%	0	0%	7	4%	0	0%
Licensed private hire driver – rent a licensed vehicle that is not kept at my home address	0	0%	0	0%	2	1%	0	0%
Private hire operator	2	67%	2	67%	9	5%	1	1%
Base	**3**	**100%**	**3**	**100%**	**171**	**100%**	**141**	**100%**

Which district are you licensed with?

Respondent type

	General Public		Business		Taxi		Representatives	
	N	%	N	%	N	%	N	%
Bolton	0	0%	0	0%	51	15%	0	0%
Bury	0	0%	0	0%	15	4%	0	0%
Manchester	0	0%	0	0%	95	28%	0	0%
Oldham	0	0%	0	0%	41	12%	0	0%
Rochdale	0	0%	0	0%	40	12%	0	0%
Salford	0	0%	0	0%	20	6%	0	0%
Stockport	0	0%	0	0%	34	10%	0	0%
Tameside	0	0%	0	0%	25	7%	0	0%
Trafford	0	0%	0	0%	19	6%	0	0%
Wigan	0	0%	0	0%	39	11%	0	0%
Outside Greater Manchester (please write in)	0	0%	0	0%	18	5%	0	0%
Don't Know	0	0%	0	0%	4	1%	0	0%
Base	**0**	**0%**	**0**	**0%**	**341**	**100%**	**0**	**0%**

Vehicles owned with a proposed daily charge of £60 to enter or travel in the Clean Air Zone?

	Bus		Coach		HGV		HGV Leisure	
	N	%	N	%	N	%	N	%
Bolton	1	25%	0	0%	0	0%	2	22%
Bury	1	25%	0	0%	0	0%	2	22%
Manchester	1	25%	0	0%	0	0%	2	22%
Oldham	1	25%	0	0%	0	0%	2	22%
Rochdale	1	25%	1	100%	0	0%	2	22%
Salford	1	25%	0	0%	0	0%	2	22%
Stockport	1	25%	0	0%	0	0%	2	22%
Tameside	2	50%	0	0%	1	50%	3	33%
Trafford	1	25%	0	0%	0	0%	2	22%
Wigan	1	25%	0	0%	0	0%	2	22%
Outside Greater Manchester (please write in)	3	75%	0	0%	1	50%	8	89%
Base	**4**	**100%**	**1**	**100%**	**2**	**100%**	**9**	**100%**

Vehicles owned with a proposed daily charge of £10 or below to enter or travel in the Clean Air Zone

	Minibus		Van/LGV		Private Hire Vehicle		Hackney Carriage	
	N	%	N	%	N	%	N	%
Bolton	2	29%	1	25%	2	50%	1	50%
Bury	1	14%	1	25%	1	25%	0	0%
Manchester	4	57%	0	0%	2	50%	0	0%
Oldham	1	14%	0	0%	1	25%	1	50%
Rochdale	1	14%	0	0%	1	25%	0	0%
Salford	1	14%	0	0%	2	50%	0	0%
Stockport	1	14%	0	0%	1	25%	0	0%
Tameside	1	14%	0	0%	1	25%	0	0%
Trafford	1	14%	0	0%	2	50%	0	0%
Wigan	2	29%	2	50%	1	25%	0	0%
Outside Greater Manchester (please write in)	2	29%	1	25%	2	50%	0	0%
Base	**7**	**100%**	**4**	**100%**	**4**	**100%**	**2**	**100%**

How old are you?

Respondent type

	General Public		Business		Taxi		Representatives	
	N	%	N	%	N	%	N	%
Under 13	4	0%	0	0%	0	0%	0	0%
13-17	10	0%	0	0%	0	0%	0	0%
18-24	71	2%	3	2%	1	0%	1	3%
25-34	435	14%	20	11%	28	8%	3	8%
35-44	588	19%	35	20%	100	30%	1	3%
45-54	605	19%	52	29%	89	27%	6	15%
55-64	685	22%	46	26%	77	23%	14	36%
65-74	478	15%	10	6%	19	6%	11	28%
75+	89	3%	0	0%	2	1%	1	3%
Prefer not to say	183	6%	11	6%	18	5%	2	5%
Base	**3148**	**100%**	**177**	**100%**	**334**	**100%**	**39**	**100%**

Vehicles owned with a proposed daily charge of £60 to enter or travel in the Clean Air Zone?

	Bus		Coach		HGV		HGV Leisure	
	N	%	N	%	N	%	N	%
Under 13	0	0%	0	0%	0	0%	0	0%
13-17	0	0%	0	0%	0	0%	0	0%
18-24	1	3%	0	0%	1	2%	10	4%
25-34	6	18%	4	31%	8	16%	28	11%
35-44	6	18%	3	23%	8	16%	45	18%
45-54	4	12%	1	8%	11	22%	79	32%
55-64	6	18%	4	31%	17	34%	60	25%
65-74	4	12%	0	0%	3	6%	12	5%
75+	0	0%	0	0%	1	2%	1	0%
Prefer not to say	6	18%	1	8%	1	2%	9	4%
Base	**33**	**100%**	**13**	**100%**	**50**	**100%**	**244**	**100%**

Vehicles owned with a proposed daily charge of £10 or below to enter or travel in the Clean Air Zone

	Minibus		Van/LGV		Private Hire Vehicle		Hackney Carriage	
	N	%	N	%	N	%	N	%
Under 13	0	0%	0	0%	0	0%	0	0%
13-17	0	0%	0	0%	0	0%	0	0%
18-24	0	0%	5	1%	1	1%	0	0%
25-34	3	14%	60	15%	27	14%	6	4%
35-44	7	33%	92	23%	69	36%	32	20%
45-54	4	19%	104	25%	38	20%	57	36%
55-64	3	14%	93	23%	39	21%	38	24%
65-74	0	0%	27	7%	5	3%	18	11%
75+	1	5%	1	0%	1	1%	1	1%
Prefer not to say	3	14%	26	6%	10	5%	8	5%
Base	**21**	**100%**	**408**	**100%**	**190**	**100%**	**160**	**100%**

How do you describe your gender?

Respondent type

	General Public		Business		Taxi		Representatives	
	N	%	N	%	N	%	N	%
A man (including Trans Man)	1638	53%	121	75%	237	72%	21	55%
A woman (including Trans Woman)	996	32%	15	9%	8	2%	13	34%
Non-binary	26	1%	3	2%	1	0%	0	0%
In another way	29	1%	1	1%	2	1%	0	0%
Prefer not to say	415	13%	21	13%	79	24%	4	11%
Base	**3104**	**100%**	**161**	**100%**	**327**	**100%**	**38**	**100%**

Vehicles owned with a proposed daily charge of £60 to enter or travel in the Clean Air Zone?

	Bus		Coach		HGV		HGV Leisure	
	N	%	N	%	N	%	N	%
A man (including Trans Man)	19	66%	10	77%	35	70%	41	17%
A woman (including Trans Woman)	2	7%	1	8%	9	18%	163	67%
Non-binary	0	0%	0	0%	0	0%	2	1%
In another way	1	3%	0	0%	1	2%	2	1%
Prefer not to say	7	24%	2	15%	5	10%	35	14%
Base	**29**	**100%**	**13**	**100%**	**50**	**100%**	**243**	**100%**

Vehicles owned with a proposed daily charge of £10 or below to enter or travel in the Clean Air Zone

	Minibus		Van/LGV		Private Hire Vehicle		Hackney Carriage	
	N	%	N	%	N	%	N	%
A man (including Trans Man)	16	76%	251	63%	138	74%	98	69%
A woman (including Trans Woman)	1	5%	85	21%	7	4%	3	2%
Non-binary	0	0%	3	1%	1	1%	0	0%
In another way	1	5%	2	1%	2	1%	0	0%
Prefer not to say	3	14%	56	14%	39	21%	42	29%
Base	**21**	**100%**	**397**	**100%**	**187**	**100%**	**143**	**100%**

Do you identify as trans/transgender?

Respondent type

	General Public		Business		Taxi		Representatives	
	N	%	N	%	N	%	N	%
Yes	17	1%	0	0%	8	2%	0	0%
No	2678	86%	135	84%	222	69%	33	87%
In some ways	20	1%	2	1%	1	0%	0	0%
Prefer not to say	383	12%	23	14%	93	29%	5	13%
Base	**3098**	**100%**	**160**	**100%**	**324**	**100%**	**38**	**100%**

Vehicles owned with a proposed daily charge of £60 to enter or travel in the Clean Air Zone?

	Bus		Coach		HGV		HGV Leisure	
	N	%	N	%	N	%	N	%
Yes	0	0%	0	0%	1	2%	1	0%
No	18	64%	11	85%	42	84%	206	85%
In some ways	0	0%	0	0%	1	2%	0	0%
Prefer not to say	10	36%	2	15%	6	12%	36	15%
Base	**28**	**100%**	**13**	**100%**	**50**	**100%**	**243**	**100%**

Vehicles owned with a proposed daily charge of £10 or below to enter or travel in the Clean Air Zone

	Minibus		Van/LGV		Private Hire Vehicle		Hackney Carriage	
	N	%	N	%	N	%	N	%
Yes	0	0%	3	1%	4	2%	4	3%
No	15	71%	334	84%	133	72%	94	66%
In some ways	0	0%	3	1%	1	1%	0	0%
Prefer not to say	6	29%	58	15%	48	26%	45	31%
Base	**21**	**100%**	**398**	**100%**	**186**	**100%**	**143**	**100%**

Which of the following best describes how you think of yourself?

Respondent type

	General Public		Business		Taxi		Representatives	
	N	%	N	%	N	%	N	%
Bisexual	94	4%	19	13%	37	19%	1	3%
Gay man	131	5%	0	0%	2	1%	2	6%
Gay woman or lesbian	45	2%	2	1%	0	0%	0	0%
Heterosexual	2170	88%	119	84%	150	79%	30	91%
Other sexual orientation	30	1%	1	1%	1	1%	0	0%
Prefer not to say	0	0%	0	0%	0	0%	0	0%
Base	**2470**	**100%**	**141**	**100%**	**190**	**100%**	**33**	**100%**

Vehicles owned with a proposed daily charge of £60 to enter or travel in the Clean Air Zone?

	Bus		Coach		HGV		HGV Leisure	
	N	%	N	%	N	%	N	%
Bisexual	0	0%	0	0%	3	8%	4	2%
Gay man	0	0%	1	9%	0	0%	4	2%
Gay woman or lesbian	0	0%	0	0%	0	0%	4	2%
Heterosexual	17	100%	9	82%	34	92%	181	93%
Other sexual orientation	0	0%	1	9%	0	0%	1	1%
Prefer not to say	0	0%	0	0%	0	0%	0	0%
Base	**17**	**100%**	**11**	**100%**	**37**	**100%**	**194**	**100%**

Vehicles owned with a proposed daily charge of £10 or below to enter or travel in the Clean Air Zone

	Minibus		Van/LGV		Private Hire Vehicle		Hackney Carriage	
	N	%	N	%	N	%	N	%
Bisexual	1	7%	15	5%	15	15%	40	36%
Gay man	1	7%	2	1%	3	3%	0	0%
Gay woman or lesbian	0	0%	3	1%	0	0%	0	0%
Heterosexual	12	86%	299	93%	79	81%	71	64%
Other sexual orientation	0	0%	1	0%	0	0%	0	0%
Prefer not to say	0	0%	0	0%	0	0%	0	0%
Base	**14**	**100%**	**320**	**100%**	**97**	**100%**	**111**	**100%**

What is your religion?

Respondent type

	General Public		Business		Taxi		Representatives	
	N	%	N	%	N	%	N	%
Buddhist	17	1%	1	1%	0	0%	0	0%
Christian	1028	33%	62	35%	57	17%	17	44%
Hindu	10	0%	0	0%	2	1%	0	0%
Jewish	24	1%	0	0%	1	0%	1	3%
Muslim	55	2%	17	10%	175	53%	1	3%
Sikh	1	0%	0	0%	0	0%	0	0%
Other religion	62	2%	5	3%	0	0%	1	3%
No religion	1406	45%	64	36%	29	9%	12	31%
Prefer not to say	510	16%	27	15%	67	20%	7	18%
Base	**3113**	**100%**	**176**	**100%**	**331**	**100%**	**39**	**100%**

Vehicles owned with a proposed daily charge of £60 to enter or travel in the Clean Air Zone?

	Bus		Coach		HGV		HGV Leisure	
	N	%	N	%	N	%	N	%
Buddhist	0	0%	0	0%	1	2%	1	0%
Christian	7	24%	4	31%	17	35%	105	43%
Hindu	0	0%	0	0%	1	2%	0	0%
Jewish	0	0%	0	0%	0	0%	0	0%
Muslim	1	3%	0	0%	2	4%	1	0%
Sikh	0	0%	0	0%	0	0%	0	0%
Other religion	1	3%	0	0%	0	0%	3	1%
No religion	11	38%	6	46%	16	33%	91	37%
Prefer not to say	9	31%	3	23%	12	24%	42	17%
Base	**29**	**100%**	**13**	**100%**	**49**	**100%**	**243**	**100%**

Vehicles owned with a proposed daily charge of £10 or below to enter or travel in the Clean Air Zone

	Minibus		Van/LGV		Private Hire Vehicle		Hackney Carriage	
	N	%	N	%	N	%	N	%
Buddhist	0	0%	2	0%	0	0%	0	0%
Christian	8	38%	137	34%	27	14%	26	16%
Hindu	0	0%	0	0%	2	1%	1	1%
Jewish	0	0%	1	0%	0	0%	1	1%
Muslim	1	5%	0	0%	100	53%	91	58%
Sikh	0	0%	0	0%	0	0%	0	0%
Other religion	0	0%	9	2%	1	1%	1	1%
No religion	7	33%	186	46%	15	8%	15	9%
Prefer not to say	5	24%	66	16%	44	23%	23	15%
Base	**21**	**100%**	**401**	**100%**	**189**	**100%**	**158**	**100%**

What is your ethnic group?

Respondent type

	General Public		Business		Taxi		Representatives	
	N	%	N	%	N	%	N	%
Asian or Asian British - Indian	10	0%	0	0%	20	6%	0	0%
Asian or Asian British - Pakistani	32	1%	16	9%	117	35%	1	3%
Asian or Asian British - Bangladeshi	6	0%	0	0%	10	3%	0	0%
Asian or Asian British - Chinese	9	0%	2	1%	1	0%	0	0%
Asian or Asian British - Kashmiri	0	0%	2	1%	23	7%	0	0%
Asian or Asian British - Any other Asian background	4	0%	0	0%	9	3%	0	0%
Black or Black British - Caribbean	8	0%	0	0%	1	0%	0	0%
Black or Black British - African	8	0%	0	0%	6	2%	0	0%
Black or Black British - Any other Black background	6	0%	0	0%	0	0%	0	0%
Mixed - White and Black Caribbean	9	0%	1	1%	0	0%	0	0%
Mixed - White and Black African	3	0%	1	1%	0	0%	0	0%
Mixed - White and Asian	18	1%	0	0%	1	0%	0	0%
Mixed - Any other mixed background	16	1%	1	1%	0	0%	0	0%
White - English/Welsh/Scottish/Northern Irish/British	2400	77%	129	73%	86	26%	31	79%
White - Irish	41	1%	1	1%	2	1%	2	5%
White - Gypsy or Irish Traveller	2	0%	2	1%	0	0%	0	0%
White - Eastern European	23	1%	1	1%	0	0%	0	0%
White - Any other White background	122	4%	1	1%	5	2%	0	0%
Other ethnic group - Arab	2	0%	0	0%	0	0%	0	0%
Other ethnic group - Other	14	0%	1	1%	2	1%	0	0%
Prefer not to say	392	13%	18	10%	48	15%	5	13%
Base	**3125**	**100%**	**176**	**100%**	**331**	**100%**	**39**	**100%**

Vehicles owned with a proposed daily charge of £60 to enter or travel in the Clean Air Zone?

	Bus		Coach		HGV		HGV Leisure	
	N	%	N	%	N	%	N	%
Asian or Asian British - Indian	0	0%	0	0%	1	2%	1	0%
Asian or Asian British - Pakistani	0	0%	0	0%	2	4%	0	0%
Asian or Asian British - Bangladeshi	0	0%	0	0%	0	0%	0	0%
Asian or Asian British - Chinese	0	0%	0	0%	1	2%	0	0%
Asian or Asian British - Kashmiri	0	0%	0	0%	0	0%	0	0%
Asian or Asian British - Any other Asian background	0	0%	0	0%	0	0%	0	0%
Black or Black British - Caribbean	0	0%	0	0%	0	0%	0	0%
Black or Black British - African	0	0%	0	0%	1	2%	0	0%
Black or Black British - Any other Black background	0	0%	0	0%	0	0%	0	0%
Mixed - White and Black Caribbean	0	0%	0	0%	0	0%	0	0%
Mixed - White and Black African	0	0%	0	0%	0	0%	0	0%
Mixed - White and Asian	0	0%	0	0%	0	0%	1	0%
Mixed - Any other mixed background	0	0%	0	0%	0	0%	0	0%
White - English/Welsh/Scottish/Northern Irish/British	19	66%	11	85%	39	78%	206	85%
White - Irish	0	0%	0	0%	0	0%	0	0%
White - Gypsy or Irish Traveller	0	0%	0	0%	0	0%	0	0%
White - Eastern European	1	3%	0	0%	0	0%	0	0%
White - Any other White background	2	7%	1	8%	0	0%	8	3%
Other ethnic group - Arab	0	0%	0	0%	0	0%	0	0%
Other ethnic group - Other	0	0%	0	0%	0	0%	0	0%
Prefer not to say	7	24%	1	8%	6	12%	27	11%
Base	**29**	**100%**	**13**	**100%**	**50**	**100%**	**243**	**100%**

Vehicles owned with a proposed daily charge of £10 or below to enter or travel in the Clean Air Zone

	Minibus		Van/LGV		Private Hire Vehicle		Hackney Carriage	
	N	%	N	%	N	%	N	%
Asian or Asian British - Indian	1	5%	0	0%	19	10%	2	1%
Asian or Asian British - Pakistani	0	0%	0	0%	62	33%	67	42%
Asian or Asian British - Bangladeshi	0	0%	0	0%	10	5%	0	0%
Asian or Asian British - Chinese	1	5%	2	0%	2	1%	0	0%
Asian or Asian British - Kashmiri	0	0%	0	0%	7	4%	18	11%
Asian or Asian British - Any other Asian background	0	0%	0	0%	7	4%	1	1%
Black or Black British - Caribbean	0	0%	0	0%	1	1%	0	0%
Black or Black British - African	0	0%	1	0%	4	2%	2	1%
Black or Black British - Any other Black background	0	0%	0	0%	0	0%	0	0%
Mixed - White and Black Caribbean	0	0%	2	0%	0	0%	0	0%
Mixed - White and Black African	0	0%	0	0%	0	0%	0	0%
Mixed - White and Asian	0	0%	0	0%	0	0%	1	1%
Mixed - Any other mixed background	0	0%	1	0%	0	0%	0	0%
White - English/Welsh/Scottish/Northern Irish/British	14	67%	330	81%	42	22%	43	27%
White - Irish	1	5%	6	1%	0	0%	2	1%
White - Gypsy or Irish Traveller	0	0%	2	0%	0	0%	0	0%
White - Eastern European	1	5%	1	0%	0	0%	0	0%
White - Any other White background	0	0%	9	2%	4	2%	3	2%
Other ethnic group - Arab	0	0%	0	0%	0	0%	0	0%
Other ethnic group - Other	0	0%	1	0%	1	1%	1	1%
Prefer not to say	3	14%	50	12%	30	16%	18	11%
Base	**21**	**100%**	**405**	**100%**	**189**	**100%**	**158**	**100%**

Are your day-to-day activities limited because of a health problem or disability?

Respondent type

	General Public		Business		Taxi		Representatives	
	N	%	N	%	N	%	N	%
Yes, limited a lot	159	5%	10	6%	6	2%	2	5%
Yes, limited a little	454	15%	18	10%	27	8%	5	13%
No	2211	71%	129	74%	241	73%	29	74%
Prefer not to say	289	9%	17	10%	54	16%	3	8%
Base	**3113**	**100%**	**174**	**100%**	**328**	**100%**	**39**	**100%**

Vehicles owned with a proposed daily charge of £60 to enter or travel in the Clean Air Zone?

	Bus		Coach		HGV		HGV Leisure	
	N	%	N	%	N	%	N	%
Yes, limited a lot	0	0%	0	0%	2	4%	11	5%
Yes, limited a little	4	14%	1	8%	4	8%	30	12%
No	19	68%	12	92%	38	78%	182	75%
Prefer not to say	5	18%	0	0%	5	10%	20	8%
Base	**0**	**0%**	**0**	**0%**	**0**	**0%**	**0**	**0%**

Vehicles owned with a proposed daily charge of £10 or below to enter or travel in the Clean Air Zone

	Minibus		Van/LGV		Private Hire Vehicle		Hackney Carriage	
	N	%	N	%	N	%	N	%
Yes, limited a lot	0	0%	19	5%	2	1%	5	3%
Yes, limited a little	5	25%	48	12%	15	8%	12	8%
No	13	65%	290	72%	138	74%	116	74%
Prefer not to say	2	10%	46	11%	31	17%	24	15%
Base	**0**	**0%**	**0**	**0%**	**0**	**0%**	**0**	**0%**

Disability

Respondent type

	General Public		Business		Taxi		Representatives	
	N	%	N	%	N	%	N	%
Learning disability	27	4%	2	7%	1	3%	0	0%
Mental ill health	112	18%	6	21%	0	0%	0	0%
Mobility disability	284	46%	12	43%	7	21%	5	71%
Sensory disability	47	8%	3	11%	0	0%	1	14%
Other disability	168	27%	9	32%	5	15%	2	29%
Prefer not to say	96	16%	3	11%	20	61%	0	0%
Base	**613**	**100%**	**28**	**100%**	**33**	**100%**	**7**	**100%**

Vehicles owned with a proposed daily charge of £60 to enter or travel in the Clean Air Zone?

	Bus		Coach		HGV		HGV Leisure	
	N	%	N	%	N	%	N	%
Learning disability	0	0%	0	0%	2	5%	0	0%
Mental ill health	0	0%	2	14%	5	12%	0	0%
Mobility disability	1	25%	8	57%	23	56%	0	0%
Sensory disability	0	0%	0	0%	4	10%	0	0%
Other disability	2	50%	5	36%	11	27%	0	0%
Prefer not to say	1	25%	0	0%	3	7%	1	100%
Base	**4**	**100%**	**14**	**100%**	**41**	**100%**	**1**	**100%**

Vehicles owned with a proposed daily charge of £10 or below to enter or travel in the Clean Air Zone

	Minibus		Van/LGV		Private Hire Vehicle		Hackney Carriage	
	N	%	N	%	N	%	N	%
Learning disability	9	8%	0	0%	3	4%	0	0%
Mental ill health	36	31%	1	20%	11	16%	1	17%
Mobility disability	35	30%	1	20%	33	49%	4	67%
Sensory disability	15	13%	0	0%	5	7%	1	17%
Other disability	40	34%	1	20%	17	25%	0	0%
Prefer not to say	12	10%	2	40%	13	19%	1	17%
Base	**117**	**100%**	**5**	**100%**	**67**	**100%**	**6**	**100%**

Are you more vulnerable to air pollution for health reasons (e.g. pregnant or suffer from asthma or a heart condition)?

Respondent type

	General Public		Business		Taxi		Representatives	
	N	%	N	%	N	%	N	%
Yes – it affects me a lot	173	6%	8	5%	6	2%	3	8%
Yes – it affects me a little	561	18%	27	16%	27	8%	6	15%
No	2101	68%	120	70%	246	76%	28	72%
Prefer not to say	263	8%	17	10%	45	14%	2	5%
Base	**3098**	**100%**	**172**	**100%**	**324**	**100%**	**39**	**100%**

Vehicles owned with a proposed daily charge of £60 to enter or travel in the Clean Air Zone?

	Bus		Coach		HGV		HGV Leisure	
	N	%	N	%	N	%	N	%
Yes – it affects me a lot	1	2%	0	0%	1	1%	5	2%
Yes – it affects me a little	5	11%	2	7%	6	4%	34	13%
No	17	37%	11	41%	40	28%	185	71%
Prefer not to say	5	11%	0	0%	2	1%	18	7%
Base	**46**	**100%**	**27**	**100%**	**143**	**100%**	**262**	**100%**

Vehicles owned with a proposed daily charge of £10 or below to enter or travel in the Clean Air Zone

	Minibus		Van/LGV		Private Hire Vehicle		Hackney Carriage	
	N	%	N	%	N	%	N	%
Yes – it affects me a lot	0	0%	13	2%	5	2%	3	2%
Yes – it affects me a little	2	5%	57	10%	15	7%	13	8%
No	16	37%	283	47%	134	67%	123	75%
Prefer not to say	2	5%	44	7%	29	14%	18	11%
Base	**43**	**100%**	**598**	**100%**	**201**	**100%**	**165**	**100%**

Where do you live?

Respondent type

	General Public		Business		Taxi		Representatives	
	N	%	N	%	N	%	N	%
Bolton	251	7%	12	7%	47	14%	4	10%
Bury	257	7%	8	5%	12	4%	2	5%
Manchester	980	26%	23	13%	66	20%	2	5%
Oldham	190	5%	20	11%	46	14%	5	12%
Rochdale	164	4%	4	2%	38	12%	2	5%
Salford	243	6%	8	5%	14	4%	6	15%
Stockport	516	14%	19	11%	29	9%	5	12%
Tameside	268	7%	16	9%	20	6%	5	12%
Trafford	354	9%	20	11%	14	4%	3	7%
Wigan	295	8%	30	17%	28	9%	3	7%
Outside Greater Manchester (please write in)	277	7%	17	10%	14	4%	4	10%
Base	**3795**	**100%**	**177**	**100%**	**328**	**100%**	**41**	**100%**

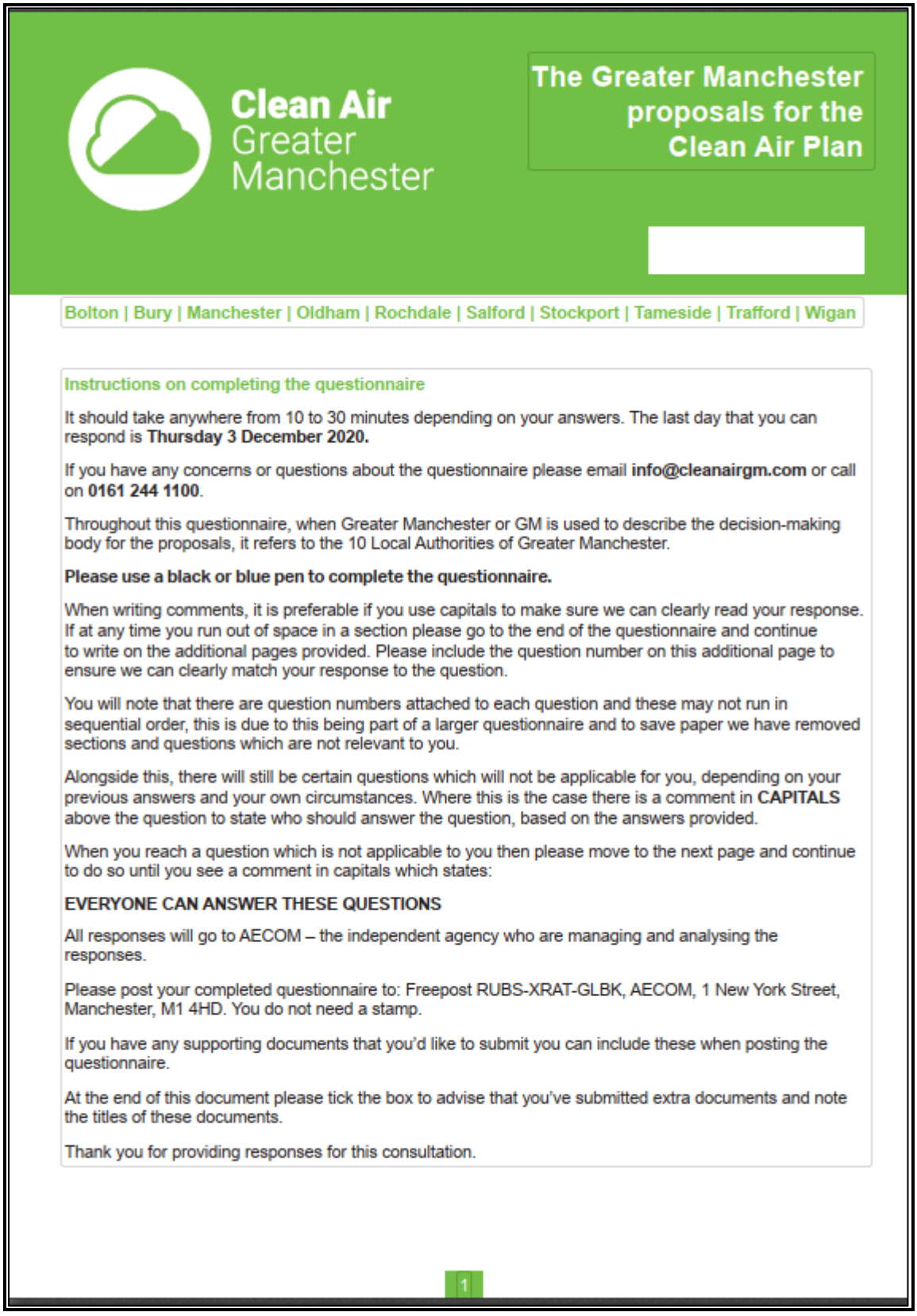
Vehicles owned with a proposed daily charge of £60 to enter or travel in the Clean Air Zone?

	Bus		Coach		HGV		HGV Leisure	
	N	%	N	%	N	%	N	%
Bolton	4	13%	0	0%	3	6%	19	8%
Bury	1	3%	0	0%	0	0%	10	4%
Manchester	2	7%	0	0%	1	2%	9	4%
Oldham	4	13%	1	8%	7	14%	17	7%
Rochdale	2	7%	1	8%	4	8%	10	4%
Salford	1	3%	1	8%	4	8%	6	2%
Stockport	3	10%	1	8%	5	10%	22	9%
Tameside	6	20%	1	8%	6	12%	19	8%
Trafford	1	3%	0	0%	1	2%	17	7%
Wigan	1	3%	0	0%	10	20%	29	12%
Outside Greater Manchester (please write in)	5	17%	7	58%	9	18%	86	35%
Base	**30**	**100%**	**12**	**100%**	**50**	**100%**	**244**	**100%**

Vehicles owned with a proposed daily charge of £10 or below to enter or travel in the Clean Air Zone

	Minibus		Van/LGV		Private Hire Vehicle		Hackney Carriage	
	N	%	N	%	N	%	N	%
Bolton	3	15%	36	9%	44	24%	0	0%
Bury	2	10%	23	6%	5	3%	7	4%
Manchester	3	15%	50	12%	39	21%	30	19%
Oldham	0	0%	27	7%	13	7%	48	30%
Rochdale	1	5%	12	3%	29	16%	8	5%
Salford	2	10%	26	6%	13	7%	4	3%
Stockport	2	10%	47	12%	8	4%	22	14%
Tameside	2	10%	47	12%	9	5%	12	8%
Trafford	1	5%	25	6%	4	2%	12	8%
Wigan	3	15%	55	14%	13	7%	15	9%
Outside Greater Manchester	1	5%	57	14%	7	4%	2	1%
Base	**20**	**100%**	**405**	**100%**	**184**	**100%**	**160**	**100%**

Appendix C Questionnaire



Clean Air Greater Manchester

The Greater Manchester proposals for the Clean Air Plan

Bolton | Bury | Manchester | Oldham | Rochdale | Salford | Stockport | Tameside | Trafford | Wigan

Instructions on completing the questionnaire

It should take anywhere from 10 to 30 minutes depending on your answers. The last day that you can respond is **Thursday 3 December 2020.**

If you have any concerns or questions about the questionnaire please email **info@cleanairgm.com** or call on **0161 244 1100**.

Throughout this questionnaire, when Greater Manchester or GM is used to describe the decision-making body for the proposals, it refers to the 10 Local Authorities of Greater Manchester.

Please use a black or blue pen to complete the questionnaire.

When writing comments, it is preferable if you use capitals to make sure we can clearly read your response. If at any time you run out of space in a section please go to the end of the questionnaire and continue to write on the additional pages provided. Please include the question number on this additional page to ensure we can clearly match your response to the question.

You will note that there are question numbers attached to each question and these may not run in sequential order, this is due to this being part of a larger questionnaire and to save paper we have removed sections and questions which are not relevant to you.

Alongside this, there will still be certain questions which will not be applicable for you, depending on your previous answers and your own circumstances. Where this is the case there is a comment in **CAPITALS** above the question to state who should answer the question, based on the answers provided.

When you reach a question which is not applicable to you then please move to the next page and continue to do so until you see a comment in capitals which states:

EVERYONE CAN ANSWER THESE QUESTIONS

All responses will go to AECOM – the independent agency who are managing and analysing the responses.

Please post your completed questionnaire to: Freepost RUBS-XRAT-GLBK, AECOM, 1 New York Street, Manchester, M1 4HD. You do not need a stamp.

If you have any supporting documents that you'd like to submit you can include these when posting the questionnaire.

At the end of this document please tick the box to advise that you've submitted extra documents and note the titles of these documents.

Thank you for providing responses for this consultation.

1

Background

Government is working with more than 60 local authorities across the UK to improve air quality. Greater Manchester has received a direction from Government to introduce a Clean Air Plan to bring nitrogen dioxide (NO_2) levels within legal limits in "the shortest possible time and by 2024 at the latest".

As air pollution does not respect geographic boundaries, the ten Greater Manchester (GM) local authorities (Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Stockport, Trafford, Tameside and Wigan) have come together to produce a joint plan. This co-ordinated approach is seen as the most effective way to deal with a problem that affects all parts of Greater Manchester and will not be remedied on a site-by-site or district-by-district basis. The Clean Air Plan is being co-ordinated by Transport for Greater Manchester (TfGM).

The core aim of the Greater Manchester Clean Air Plan is to remove ALL roadside concentrations of NO_2 that have been forecast to exceed the legal limits in the shortest possible time in line with Government guidance. Greater Manchester expects that once the Clean Air Plan has been implemented, by 2024 roadside NO_2 limits will have been met across Greater Manchester.

What can you have a say on?

Some elements of the Greater Manchester Clean Air Plan proposals are requirements which have been legally instructed by Government as a result of a Ministerial Direction, (following proposals submitted by GM). These elements are not open to change, and so we are not seeking feedback on these through the consultation. The elements that are fixed include:

- The requirement for a Category C Clean Air Zone
- The type of vehicles which should pay a charge
- The timing of the implementation of the Clean Air Zone in Greater Manchester

However, we do want your views on the following:

- Elements of the Clean Air Zone such as the details of the proposed boundary, the proposed operation and the proposed daily charge, discounts and exemptions
- Supporting measures such as the funds and vehicle finance available to support impacted vehicles
- The impacts of the COVID-19 pandemic on the ability of businesses / organisations to respond to the proposals

Who can take part?

We want as many views as possible on this important consultation. Anyone who lives in the UK who is interested in or affected by the proposals should get involved to share their views.

Where can I find more information?

Before answering any of the consultation questions, please read the consultation document which can be found at **cleanairgm.com**. You will also find supporting documents to give you more detailed, technical information on the proposals.

The consultation is open until **23:59 on Thursday 3 December 2020**.

If you have any questions or concerns about the questionnaire, please email **info@cleanairgm.com** or call **0161 244 1100**.

*For support to respond to this consultation or to request copies of the consultation document and questionnaire please contact **info@cleanairgm.com** or **0161 244 1100**. Support for non-English speakers is available on **0161 244 1100**.*

Confidentiality and data protection

TfGM has commissioned the independent research organisation AECOM to receive and analyse responses to the consultation, and to prepare a report of the findings. Transport for Greater Manchester (TfGM) are the data controller and are delivering this consultation for the 10 Greater Manchester Local Authorities under delegated authority. Both TfGM and AECOM will process your personal data in accordance with the Data Protection Act (DPA) 2018, and the General Data Protection Regulation (GDPR).

Information you provide including personal information in response to the consultation will only be published in aggregate form or anonymised. However, if you are responding to the consultation in an official capacity, we may attribute comments you make to the organisation or body you represent. It should be noted that information provided in response to this consultation, including personal information, may be subject to disclosure in accordance with the access to information regimes. These are primarily the Freedom of Information Act 2000 (FOIA), the Environmental Information Regulations (EIR) 2004, the Data Protection Act (DPA) 2018, and the General Data Protection Regulation (GDPR). Therefore, if we receive a request for disclosure of the information, we cannot give an assurance that confidentiality can be maintained in all circumstances.

Further details of how TfGM process your personal data provided during the consultation and for details of how you can exercise your rights are available at **tfgm.com/privacy-policy** or by emailing **data.protection@tfgm.com**. For AECOM's privacy policy, please visit **aecom.com/privacy-policy** or email **privacyquestions@aecom.com**.

If you no longer wish for us to use your personal information during the analysis stage, you have a right to have the relevant information deleted. Please email **privacyquestions@aecom.com** before the consultation ends at **23:59 on Thursday 3 December 2020**.

EVERYONE CAN ANSWER THESE QUESTIONS

Opening questions

Q01. Are you responding to this consultation as a…?

Please tick one only

- ☐ Member of the public
- ☐ Business (including self-employed and sole traders)
- ☐ Hackney / Private Hire Vehicle - driver / operator
- ☐ Organisation (e.g. schools, charities, social enterprise, trade organisations, government bodies)
- ☐ Councillor / elected official

ONLY ANSWER IF YOU ARE RESPONDING ON BEHALF OF A BUSINESS, ORGANISATION, CHARITY OR A PRIVATE HIRE VEHICLE OPERATOR

Q02. Please provide the name of the organisation.

Please write in your response below

Q03. Are you authorised to respond on behalf of this organisation?

Please tick one only

- ☐ Yes
- ☐ No

ONLY ANSWER IF YOU ARE RESPONDING AS A COUNCILLOR OR ELECTED OFFICIAL

Q04. Please provide the following details:

The area you are elected to represent.

Your name.

4

EVERYONE CAN ANSWER THESE QUESTIONS

Q05. Before this consultation, were you aware of the legal requirement placed on Greater Manchester from Government to introduce plans to tackle air pollution and to introduce a Category C charging Clean Air Zone?

Please tick one only

- ☐ Yes
- ☐ No

Q06. Do you currently own / lease or drive any of the following vehicles?

Please tick all that apply

- ☐ Bus
- ☐ Coach
- ☐ Minibus (not licensed as private hire vehicle)
- ☐ HGV leisure vehicle (e.g. horsebox >3.5t)
- ☐ Van / Light goods vehicle (LGV)
- ☐ Heavy goods vehicle (HGV)
- ☐ Private hire vehicle
- ☐ Hackney carriage
- ☐ Private car / motorbike / moped
- ☐ Other (please specify):

- ☐ No

5

EVERYONE CAN ANSWER THESE QUESTIONS

Q07. Under the current proposals would you have to pay a charge for your vehicle(s) to travel in the Clean Air Zone?

You can check whether you would be likely to pay a daily charge to enter or travel within the Clean Air Zone at cleanairgm.com/vehicle-checker.

Please tick one answer for each vehicle

	Yes	No	Don't know	Not applicable/ I don't have a vehicle
Bus	☐	☐	☐	☐
Coach	☐	☐	☐	☐
Minibus (not licensed as private hire vehicle)	☐	☐	☐	☐
HGV leisure vehicle (e.g. horsebox >3.5t)	☐	☐	☐	☐
Van / Light goods vehicle (LGV)	☐	☐	☐	☐
Heavy goods vehicle (HGV)	☐	☐	☐	☐
Private Hire Vehicle	☐	☐	☐	☐
Hackney Carriage	☐	☐	☐	☐
Private car/motorbike / moped	☐	☐	☐	☐
Other (please write the vehicle type in this box)	☐	☐	☐	☐

NOTE: Private cars, motorbikes and mopeds would not be charged to travel in the Clean Air Zone

6

EVERYONE CAN ANSWER THESE QUESTIONS

Q08. If you have a vehicle but won't have to pay the charge - please state why not.

Please tick one answer for each vehicle where you've stated "no" in the last question

	Don't travel in the Clean Air Zone	Vehicle(s) will be compliant	Vehicle(s) will be exempt	Don't know	Other reasons
Bus	☐	☐	☐	☐	☐
Coach	☐	☐	☐	☐	☐
Minibus (not licensed as private hire vehicle)	☐	☐	☐	☐	☐
HGV leisure vehicle (e.g. horsebox >3.5t)	☐	☐	☐	☐	☐
Van / Light goods vehicle (LGV)	☐	☐	☐	☐	☐
Heavy goods vehicle (HGV)	☐	☐	☐	☐	☐
Private Hire Vehicle	☐	☐	☐	☐	☐
Hackney Carriage	☐	☐	☐	☐	☐
Private car/motorbike/moped	☐	☐	☐	☐	☐
Other (please write the vehicle type in this box)	☐	☐	☐	☐	☐

NOTE: Private cars, motorbikes and mopeds would not be charged to travel in the Clean Air Zone

7

EVERYONE CAN ANSWER THESE QUESTIONS

Clean Air Zone

For more information to support you in answering these questions, please visit **cleanairgm.com** and read section 4.1 (Clean Air Zone at a glance) in the consultation document.

Q1. The proposed Clean Air Zone boundary would follow the existing administrative boundary of Greater Manchester as closely as possible. Do you have any comments on this?

You can see a more detailed map which can zoom to a specific location here:
https://cleanairgm.com/clean-air-zone-map

Please write in your response below, additional space is provided at the end of the questionnaire, if needed



8

EVERYONE CAN ANSWER THESE QUESTIONS

Q2. The Clean Air Zone would operate 24 hours a day, seven days a week, signage would be used to clearly identify the Clean Air Zone, and the daily charges would apply from midnight to midnight. Do you have any comments on these proposals?

Please write in your response below, additional space is provided at the end of the questionnaire, if needed

9

EVERYONE CAN ANSWER THESE QUESTIONS

Q3. Please tell us what you think of the proposed daily charges for each of the vehicles?

(The charge would only apply to vehicles used within the Clean Air Zone which do not meet the emissions standards).

Please tick one answer for each vehicle

	Too much	About right	Too little	Don't know
Buses - £60	☐	☐	☐	☐
Coaches - £60	☐	☐	☐	☐
HGV - £60	☐	☐	☐	☐
Vans - £10	☐	☐	☐	☐
Minibuses - £10	☐	☐	☐	☐
Hackney Carriages - £7.50	☐	☐	☐	☐
Private Hire Vehicles - £7.50	☐	☐	☐	☐

Q3a. Do you have any comments on the proposed charges?

Please write in your response below, additional space is provided at the end of the questionnaire, if needed

10

EVERYONE CAN ANSWER THESE QUESTIONS

Exemptions and Discounts proposed by Greater Manchester

For more information to support you in answering these questions, please visit **cleanairgm.com** and read section 4.4 (Discounts and Exemptions) in the consultation document.

Permanent Local Exemptions

Greater Manchester are proposing permanent local exemptions for Clean Air Zone charges for specialist vehicles, vehicles entering Greater Manchester due to a road diversion on the motorway network and vehicles used for the purposes of a disabled person which are exempt from vehicle tax.

Q4. To what extent do you agree or disagree with the permanent local exemptions proposed by Greater Manchester?

Please tick one only

- ☐ Strongly agree
- ☐ Slightly agree
- ☐ Neither agree nor disagree
- ☐ Slightly disagree
- ☐ Strongly disagree
- ☐ Don't know
- ☐ Not applicable

Q4a. Why do you say this?

Please write in your response below, additional space is provided at the end of the questionnaire, if needed

11

EVERYONE CAN ANSWER THESE QUESTIONS

Temporary Local Exemptions

Greater Manchester are proposing temporary local exemptions from Clean Air Zone charges until **31 December 2022** to give certain vehicles more time to upgrade due to cost / supply of a compliant vehicle and to lessen impacts considered outside of the control of the vehicle owner, these include wheelchair accessible hackney carriage / private hire vehicles, and vans.

Q5. To what extent do you agree or disagree with the temporary local exemptions proposed by Greater Manchester?

Please tick one only

- ☐ Strongly agree
- ☐ Slightly agree
- ☐ Neither agree nor disagree
- ☐ Slightly disagree
- ☐ Strongly disagree
- ☐ Don't know
- ☐ Not applicable

Q5a. Why do you say this?

Please write in your response below, additional space is provided at the end of the questionnaire, if needed

12

EVERYONE CAN ANSWER THESE QUESTIONS

Permanent Local Discounts

Greater Manchester are proposing permanent local discounts for Clean Air Zone charges for private hire vehicles licensed to one of the 10 Greater Manchester Local Authorities and also used as a private car and leisure vehicles greater than 3.5 tonnes in private ownership.

Q6. To what extent do you agree or disagree with the permanent local discounts proposed by Greater Manchester?

Please tick one only

- ☐ Strongly agree
- ☐ Slightly agree
- ☐ Neither agree nor disagree
- ☐ Slightly disagree
- ☐ Strongly disagree
- ☐ Don't know
- ☐ Not applicable

Q6a. Why do you say this?

Please write in your response below, additional space is provided at the end of the questionnaire, if needed

13

EVERYONE CAN ANSWER THESE QUESTIONS

Funding for the upgrade of non-compliant vehicles registered in Greater Manchester

For more information to support you in answering these questions, please visit **cleanairgm.com** and read section 5 (Funding to upgrade to compliant vehicles) in the consultation document.

Funding to support bus operators

Greater Manchester are proposing financial support to help operators who are registered in Greater Manchester and run a registered bus service in Greater Manchester.

Q7. Do you have any comments on the proposed Clean Bus Fund (e.g. eligibility criteria, funding amounts)?

Please write in your response below, additional space is provided at the end of the questionnaire, if needed

14

EVERYONE CAN ANSWER THESE QUESTIONS

You could be eligible for this fund if you are registered in Greater Manchester, run a registered bus service and have a vehicle(s) which is not compliant with the Clean Air Zone.

Q7a. Do you believe you are eligible to access this fund?

Please tick one only

- ☐ Yes
- ☐ No
- ☐ Don't know
- ☐ Not applicable

IF YOU HAVE SAID YES, YOU BELIEVE YOU ARE ELIGIBLE

Q7b. Would the proposed fund meet your needs e.g. support you to upgrade your vehicle(s)?

Please tick one only

- ☐ Yes
- ☐ No
- ☐ Don't know

IF YOU HAVE SAID NO, OR YOU DON'T KNOW IF, THE FUND WOULD NOT MEET YOUR NEEDS

Q7bb. Why do you say this?

Please write in your response below, additional space is provided at the end of the questionnaire, if needed

15

EVERYONE CAN ANSWER THESE QUESTIONS

Q7c. Do you have any comments about the proposed management of the funds (e.g. if over-subscribed the oldest vehicles could be targeted first)?

Please write in your response below, additional space is provided at the end of the questionnaire, if needed

16

EVERYONE CAN ANSWER THESE QUESTIONS

Funding to support coaches, minibuses, HGVs or vans

Greater Manchester are proposing financial support to help smaller local businesses, sole traders and the Voluntary, Community and Social Enterprise (VCSE) organisations upgrade vans and HGVs, minibuses and coaches, to cleaner compliant vehicles.

Q8. Do you have any comments on the proposed Clean Commercial Vehicle Fund (e.g. eligibility criteria, funding amounts)?

Please write in your response below, additional space is provided at the end of the questionnaire, if needed

17

EVERYONE CAN ANSWER THESE QUESTIONS

Funding to support coaches, minibuses, HGVs or vans

You could be eligible for this fund if you are a smaller local business, sole trader or a VCSE organisation registered to an address within Greater Manchester for no less than 12 months prior to the date of application and have a vehicle(s) which is not compliant with the Clean Air Zone.

Q8a. Do you believe you are eligible to access this fund?

Please tick one only

- ☐ Yes
- ☐ No
- ☐ Don't know
- ☐ Not applicable

IF YOU HAVE SAID YES, YOU BELIEVE YOU ARE ELIGIBLE

Q8b. Would the proposed fund meet your needs e.g. support you to upgrade your vehicle(s)?

Please tick one only

- ☐ Yes
- ☐ No
- ☐ Don't know

IF YOU HAVE SAID NO, OR YOU DON'T KNOW IF, THE FUND WOULD NOT MEET YOUR NEEDS

Q8bb. Why do you say this?

Please write in your response below, additional space is provided at the end of the questionnaire, if needed

18

EVERYONE CAN ANSWER THESE QUESTIONS

Q8c. Do you have any comments about the proposed management of the funds (e.g. financial support could be available for the smallest businesses first)?

Please write in your response below, additional space is provided at the end of the questionnaire, if needed

19

EVERYONE CAN ANSWER THESE QUESTIONS

Funding to support taxis (hackney carriages and private hire vehicles)

Greater Manchester are proposing financial support to help upgrade hackney carriages / private hire vehicles licensed to one of the 10 Greater Manchester Local Authorities to cleaner compliant vehicles.

Q9a. Do you have any comments on the proposed funds for hackney carriages (e.g. eligibility criteria, funding amounts)?

Please write in your response below, additional space is provided at the end of the questionnaire, if needed

Q9b. Do you have any comments on the proposed funds for private hire vehicles (e.g. eligibility criteria, funding amounts)?

Please write in your response below, additional space is provided at the end of the questionnaire, if needed

20

EVERYONE CAN ANSWER THESE QUESTIONS

Q9c. Do you have any comments on the 'try before you buy' initiative?

Please write in your response below, additional space is provided at the end of the questionnaire, if needed

21

EVERYONE CAN ANSWER THESE QUESTIONS

You could be eligible for these funds if you are trading and operating as a licensed hackney carriage or private hire driver or operator with one of the 10 Local Authorities in Greater Manchester for no less than 12 months and have a vehicle(s) which is not compliant with the Clean Air Zone.

Q9d. Do you believe you are eligible to access either of these funds?

Please tick one only

- ☐ Yes
- ☐ No
- ☐ Don't know
- ☐ Not applicable

IF YOU HAVE SAID YES, YOU BELIEVE YOU ARE ELIGIBILE

Q9e. Would the proposed funds / 'try before you buy' meet your needs e.g. support you to upgrade your vehicle(s)?

Please tick one only

- ☐ Yes
- ☐ No
- ☐ Don't know

IF YOU HAVE SAID NO, OR YOU DON'T KNOW IF, THE FUNDS WOULD NOT MEET YOUR NEEDS

Q9ee. Why do you say this?

Please write in your response below, additional space is provided at the end of the questionnaire, if needed

22

EVERYONE CAN ANSWER THESE QUESTIONS

Q9f. Do you have any comments about the proposed management of funds (e.g. offered on a first-come-first-served basis once an applicant has evidenced that the eligibility criteria are met)?

Please write in your response below, additional space is provided at the end of the questionnaire, if needed

23

EVERYONE CAN ANSWER THESE QUESTIONS

Vehicle Finance Offer

A Greater Manchester appointed panel of finance providers will work alongside the Clean Commercial Vehicle Fund and Clean Taxi Fund to offer eligible owners of a non-compliant vehicle the option of either a lump sum grant or a finance contribution towards vehicle finance to help them upgrade to a compliant vehicle.

Q10a. Do you have any comments on the proposed Vehicle Finance Offer?

Please write in your response below, additional space is provided at the end of the questionnaire, if needed

24

ANSWER IF YOU BELIEVE YOU ARE ELIGIBLE FOR CLEAN COMMERCIAL OR CLEAN TAXI FUNDINGS

You would be able to access vehicle finance if you are offered Clean Commercial Vehicle Funding or Clean Taxi Funding, at this time you would be given the option of either a lump sum grant or a finance contribution towards vehicle finance for upgrade to a compliant vehicle.

Q10b. To what extent do you agree or disagree that the proposed vehicle finance offer would meet your needs e.g. support you to upgrade your vehicle(s)?

Please tick one only

- ☐ Strongly agree
- ☐ Slightly disagree
- ☐ Neither agree nor disagree
- ☐ Slightly disagree
- ☐ Strongly disagree
- ☐ Don't know
- ☐ Not applicable

Q10c. Why do you say this?

Please write in your response below, additional space is provided at the end of the questionnaire, if needed

25

EVERYONE CAN ANSWER THESE QUESTIONS

Hardship Fund

Greater Manchester are proposing a Hardship Fund of at least £10m to support individuals, companies and organisations who are assessed to be most economically vulnerable to the Clean Air Zone daily charges. The scope and scale of support required will be considered in light of the impact of COVID-19 and the responses to this questionnaire.

Q11a. Do you support a hardship fund?

Please tick one only

- ☐ Yes
- ☐ No
- ☐ Don't know

Q11aa. Please explain why.

Please write in your response below, additional space is provided at the end of the questionnaire, if needed

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EVERYONE CAN ANSWER THESE QUESTIONS

Q11b. If you are impacted by the proposed clean air zone daily charges, is there any additional support that you would need?

Please write in your response below, additional space is provided at the end of the questionnaire, if needed

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EVERYONE CAN ANSWER THESE QUESTIONS

Overall impact

Q12. To what extent do you agree or disagree that air quality needs to be improved in Greater Manchester?

Please tick one only

- ☐ Strongly agree
- ☐ Slightly disagree
- ☐ Neither agree nor disagree
- ☐ Slightly disagree
- ☐ Strongly disagree
- ☐ Don't know

Q13. Having read through the proposals, how confident are you that the Greater Manchester Clean Air Plan would bring roadside nitrogen dioxide (NO_2) levels within legal limits in the shortest possible time?

Please tick one only

- ☐ Very confident
- ☐ Fairly confident
- ☐ Neither
- ☐ Fairly unconfident
- ☐ Very unconfident
- ☐ Don't know
- ☐ Prefer not to say

Q13a. Do you have any other comments on the proposals for the Clean Air Plan as set out in the consultation document?

Please write in your response below, additional space is provided at the end of the questionnaire, if needed

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EVERYONE CAN ANSWER THESE QUESTIONS

Q14. Taking into account both the Clean Air Zone and the support offered, what would be the likely impact on you / your business / your organisation?

Please write in your response below, additional space is provided at the end of the questionnaire, if needed

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PLEASE ANSWER IF YOU ARE RESPONDING

- **ON BEHALF OF A BUSINESS**
- **AS A TAXI OR PRIVATE HIRE VEHICLE DRIVER OR OPERATOR**
- **ON BEHALF OF AN ORGANISATION**

COVID-19

Greater Manchester is aware that businesses have been, and continue to be, impacted by the COVID-19 pandemic.

To understand the impact on you and your business / organisation please answer the following questions.

Q15a. Which of the following best reflects your trading status as a result of the COVID-19 pandemic?

Please tick all that apply

- ☐ Have continued trading throughout
- ☐ Currently trading, having temporarily paused - but have resumed trading during the pandemic
- ☐ Paused trading
- ☐ Permanently ceased trading
- ☐ Other, please state

Q15b. Have you or your business received any of the following as a result of the COVID-19 pandemic?

Please tick all that apply

- ☐ Coronavirus job retention scheme (aka Furlough)
- ☐ Government-backed accredited loans or finance agreements (aka CBIL / BBLS)
- ☐ Business grants funded by the UK and devolved governments
- ☐ Self-employment income support scheme
- ☐ Other government support
- ☐ Other loans / grants (please specify)
- ☐ Not applied for any of these schemes

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PLEASE ANSWER IF YOU ARE RESPONDING:

- **ON BEHALF OF A BUSINESS**
- **AS A TAXI OR PRIVATE HIRE VEHICLE DRIVER OR OPERATOR**
- **ON BEHALF OF AN ORGANISATION**

Q15c. To what extent has the COVID-19 pandemic affected the following aspects of your business?

Please tick one answer for each vehicle

	A lot less than before	Less than before	Same as before	More than before	A lot more than before	Not applicable	Don't know	Prefer not to say
Level of debt	☐	☐	☐	☐	☐	☐	☐	☐
Reserves / Savings	☐	☐	☐	☐	☐	☐	☐	☐
Turnover	☐	☐	☐	☐	☐	☐	☐	☐
Profitability	☐	☐	☐	☐	☐	☐	☐	☐

Q15d. Please use this space to tell us about how the COVID-19 pandemic has affected your ability to meet the proposals outlined within the consultation document:

Please write in your response below, additional space is provided at the end of the questionnaire, if needed

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ANSWER IF YOU ARE RESPONDING AS A MEMBER OF THE PUBLIC OR A COUNCILLOR / ELECTED OFFICIAL

Greater Manchester is aware that people and businesses have been, and continue to be, impacted by the COVID-19 pandemic.

Q15dd. Do you have any comments on the impact of the COVID-19 pandemic on the proposals outlined within the consultation document?

Please write in your response below, additional space is provided at the end of the questionnaire, if needed

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EVERYONE CAN ANSWER THESE QUESTIONS

Equality Impact Assessment

Q16. A draft Equality Impact Assessment has been produced to identify the potential impacts of the Clean Air Plan proposals on persons with protected characteristics. This can be found at cleanairgm.com.

Please use this space to provide any comments on the draft Equality Impact Assessment, additional space is provided at the end of the questionnaire, if needed

PLEASE ANSWER IF YOU ARE A HACKNEY CARRIAGE OR PRIVATE HIRE VEHICLE OWNER/DRIVER/ OPERATOR

Q09. Are you a…

Please tick all that apply

- ☐ Licensed hackney carriage driver – own vehicle
- ☐ Licensed hackney carriage driver– rent a licensed vehicle that is kept at my home address
- ☐ Licensed hackney carriage driver– rent a licensed vehicle that is not kept at my home address
- ☐ Licensed private hire driver – own vehicle
- ☐ Licensed private hire driver – rent a licensed vehicle that is kept at my home address
- ☐ Licensed private hire driver – rent a licensed vehicle that is not kept at my home address
- ☐ Private hire operator

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PLEASE ANSWER IF YOU ARE RESPONDING AS A BUSINESS OR ORGANISATION

About you / your organisation

Q010. Where is your business, charity or organisation registered?

Please tick all that apply

- ☐ Bolton
- ☐ Bury
- ☐ Oldham
- ☐ Rochdale
- ☐ Stockport
- ☐ Outside Greater Manchester (please write in)
- ☐ Tameside
- ☐ Trafford
- ☐ Manchester
- ☐ Salford
- ☐ Wigan

PLEASE ANSWER IF YOU ARE RESPONDING AS A BUSINESS

Q011. What sector does your business fall into?

Please tick one only

- ☐ Agriculture, forestry & fishing
- ☐ Mining, quarrying & utilities
- ☐ Manufacturing
- ☐ Construction
- ☐ Motor trades
- ☐ Wholesale
- ☐ Retail
- ☐ Transport & storage
- ☐ Accommodation & food services
- ☐ Information & communication
- ☐ Financial & insurance
- ☐ Property
- ☐ Professional, scientific & technical
- ☐ Business administration & support services
- ☐ Public administration & defence
- ☐ Education
- ☐ Health
- ☐ Arts, entertainment, recreation & other

Q012. What is the size of your business?

Please tick one only

- ☐ Sole trader / self-employed (1 person)
- ☐ Micro business (2-9 employees)
- ☐ Small business (10-49 employees)
- ☐ Medium business (50-249 employees)
- ☐ Large business (250+ employees)

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EVERYONE CAN ANSWER THESE QUESTIONS

Q013. Where do you live?

Please tick all that apply

- ☐ Bolton
- ☐ Bury
- ☐ Oldham
- ☐ Rochdale
- ☐ Stockport
- ☐ Outside Greater Manchester (please write in)
- ☐ Tameside
- ☐ Trafford
- ☐ Manchester
- ☐ Salford
- ☐ Wigan

Q.014. Postcode

What is your home postcode?

What is your registered business postcode?

PLEASE ANSWER IF YOU ARE RESPONDING AS A HACKNEY OR PRIVATE HIRE DRIVER OR OPERATOR

Q015. Which district are you licensed with?

Please tick all that apply

- ☐ Bolton
- ☐ Bury
- ☐ Oldham
- ☐ Rochdale
- ☐ Stockport
- ☐ Outside Greater Manchester (please write in)
- ☐ Tameside
- ☐ Trafford
- ☐ Manchester
- ☐ Salford
- ☐ Wigan

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EVERYONE CAN ANSWER THESE QUESTIONS

We must consider how different people will be affected by our strategies and policies, and we also want to make sure we hear from people from all of Greater Manchester's diverse backgrounds. Therefore the last few questions are about you, to help us ensure we hear from a range of voices, and to help identify any possible discrimination or barriers for particular groups of people. The personal information you give us will remain strictly confidential and we will not use it in a way that could identify you.

If there are questions you would prefer not to answer please choose the 'prefer not to say' option.

Q016. How old are you?

Please tick one only

- ☐ Under 13
- ☐ 13-17
- ☐ 18-24
- ☐ 25-34
- ☐ 35-44
- ☐ 45-54
- ☐ 55-64
- ☐ 65-74
- ☐ 75+
- ☐ Prefer not to say

Q017. What is your ethnic group?

Please tick one only

- ☐ Asian or Asian British - Indian
- ☐ Asian or Asian British - Pakistan
- ☐ Asian or Asian British - Bangladesh
- ☐ Asian or Asian British - Chinese
- ☐ Asian or Asian British - Kashmirl
- ☐ Asian or Asian British - Any other Asian background
- ☐ Black or Black British - Caribbean
- ☐ Black or Black British - African
- ☐ Black or Black British - Any other Black background
- ☐ Mixed - White and Black Caribbean
- ☐ Mixed - White and Black African
- ☐ Mixed - White and Asian
- ☐ Mixed - Any other mixed background
- ☐ White - English/Welsh/Scottish/ Northern Irish/British
- ☐ White - Irish
- ☐ White - Gypsy or Irish Traveller
- ☐ White - Eastern European
- ☐ White - Any other White background
- ☐ Other ethnic group - Arab
- ☐ Other ethnic group - Other
- ☐ Prefer not to say

Q018. What is your religion?

Please tick one only

- ☐ Buddhist
- ☐ Christian
- ☐ Hindu
- ☐ Jewish
- ☐ Muslim
- ☐ Sikh
- ☐ Other religion
- ☐ No religion
- ☐ Prefer not to say

36

EVERYONE CAN ANSWER THESE QUESTIONS

Q019. How do you describe your gender?

Please tick one only

- ☐ A man (including Trans Man)
- ☐ A woman (including Trans Women)
- ☐ Non-binary
- ☐ In another way
- ☐ Prefer not to say

Q020. Do you identify as trans/transgender?

Please tick one only

- ☐ Yes
- ☐ No
- ☐ In some ways
- ☐ Prefer not to say

Q021. Which of the following best describes how you think of yourself?

Please tick one only

- ☐ Bisexual
- ☐ Gay man
- ☐ Gay woman or lesbian
- ☐ Heterosexual
- ☐ Other sexual orientation (please write in below)
- ☐ Prefer not to say

Q022. Are your day-to-day activities limited because of a health problem or disability?

Please tick one only

- ☐ Yes, limited a lot
- ☐ Yes, limited a little
- ☐ No
- ☐ Prefer not to say

Q023. Could you please tell me which of the conditions best describe your health issues or disability?

Please tick all that apply

- ☐ Learning disability
- ☐ Mental ill heath
- ☐ Mobility disability
- ☐ Other disability (please write in)
- ☐ Sensory disability
- ☐ Prefer not to say

Q024. Are you more vulnerable to air pollution for health reasons (e.g. pregnant or suffer from asthma or a heart condition)?

Please tick one only

- ☐ Yes - it affects me a lot
- ☐ Yes - it affects me a little
- ☐ No
- ☐ Prefer not to say

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EVERYONE CAN ANSWER THESE QUESTIONS

Q025. How did you hear about this consultation?

Please tick one only

- ☐ Email
- ☐ Twitter
- ☐ Facebook
- ☐ Instagram
- ☐ LinkedIn
- ☐ Posters
- ☐ Search engine advert
- ☐ Other (please write in) _____
- ☐ Radio
- ☐ Local newspaper
- ☐ Events
- ☐ cleanairgm.com website
- ☐ Website (not cleanairgm.com website)
- ☐ Word of mouth
- ☐ Prefer not to say

Q026. Please see privacy notice at tfgm.com/privacy-policy to see how your data will be held and your individual rights under GDPR.

Please select those that apply in the list below, if...

- ☐ You would like to be kept informed on the development of the Clean Air Plan proposals
- ☐ You own / drive an impacted vehicle and would like information about support when it becomes available
- ☐ You are willing to take part in further research / consultation activity
- ☐ I do not want to provide my contact details

Q027: Contact

Please provide the following details

Name _____

Telephone Number _____

Email address _____

NOTE: If you are aged under 13, we require the contact details from a parent or legal guardian and they must confirm they have given their permission to provide their contact details by ticking below:

- ☐ As a parent / guardian of the person responding to this consultation who is aged under 13, I have provided my contact details.

Thank you for sharing your views on the Greater Manchester Clean Air Plan proposals.

Once the consultation has closed on **Thursday 3 December 2020**, all the feedback received will be read and considered to help shape the final plan.

Please post your completed questionnaire to the address below. You do not need a stamp.

Greater Manchester Clean Air Plan
Freepost RUBS-XRAT-GLBK
AECOM
1 New York Street
MANCHESTER
M1 4HD

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IF YOU HAVE RUN OUT OF SPACE WHEN WRITING A COMMENT, PLEASE COMPLETE YOUR COMMENT HERE:

Question:

Question:

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For support to respond to this consultation or to request copies of the summary document and questionnaire please contact **info@cleanairgm.com** or **0161 244 1100**. Support for non-English speakers is available on **0161 244 1100**."

Prosimy o kontakt przez email **info@cleanairgm.com** lub telefonicznie pod numerem **0161 244 1100** po pomoc w odpowiedzi na tą konsultację lub aby móc otrzymać egzemplarze dokumentacji z podsumowaniem wraz z ankietą.

Wsparcie dla osób nie mówiących po angielsku można otrzymać pod numerem **0161 244 1100**.

এই পরামর্শে সাড়া দিতে সাহায্যের জন্য অথবা সামারি ডকুমেন্ট অর্থাৎ সারমর্ম এবং প্রশ্নমালার কপি পেতে ইমেইলে যোগাযোগ করুন - info@cleanairgm.com
*অথবা, এই নাম্বারে ফোন করুন- **0161 244 1100***
*যারা ইংরেজি বলেন না তাদের জন্য সহযোগিতার ব্যবস্থা রয়েছে, সাহায্য পেতে এই নাম্বারে ফোন করুন- **0161 244 1100***

اس مشاورت کا جواب دینے میں مدد یا دستاویز کا خلاصہ اور سوالنامہ کی کاپی حاصل کرنے کے لیئے براہ مہربانی
info@cleanairgm.com یا 0161 244 1100 پر رابطہ کیجئے۔
جن افراد کو انگریزی بولنے میں مدد درکار ہے وہ 0161 244 1100 پر فون کریں۔

"દસ્તાવેજના સારાંશ અને પ્રશ્નાવલિની નકલો મેળવવા માટે અથવા આ પરામર્શનો જવાબ આપવા માટે મદદ મેળવવા કૃપા કરીને info@cleanairgm.com પર ઇમેઇલ દ્વારા સંપર્ક કરો

અથવા તમે 0161 244 1100 પર ટેલિફોન કરી શકો છો.

જે લોકો અંગ્રેજી નથી બોલતા, તેઓ મદદ મેળવવા, 0161 244 1100 પર ટેલિફોન કરી શકે છે."

"للحصول على الدعم للرد على هذه الاستشارة أو لطلب نسخ من الوثيقة الموجزة والاستبيان، يرجى التواصل على البريد الالكتروني
info@cleanairgm.com أو الإتصال بالرقم 0161 244 1100.

يتوفر الدعم لغير الناطقين باللغة الإنجليزية على الرقم 0161 244 1100."

Appendix D Qualitative Discussions

Introduction

Poor air quality is the largest environmental risk to human health and whilst air quality has been improving over time, pollutants remain a concern in many urban areas, including Greater Manchester.

Since 2010, the UK has been in breach of the legal limits of levels of Nitrogen Dioxide (NO_2) in major urban areas, with road transport responsible for a significant proportion of roadside concentrations. In response, the Government is working with more than 60 local authorities, including the Greater Manchester districts, across the UK to improve air quality. This includes a specific direction to introduce a Clean Air Plan (CAP) to bring NO_2 levels within legal limits in “the shortest possible time and by 2024 at the latest”.

Eight Greater Manchester authorities were initially identified by the Government as having roads which are expected to continue to exceed the maximum legal limits of NO_2 in 2021. However, local air quality modelling has shown that there are exceedances in all ten authorities and action needs to be taken to address the issue.

The core aim of the Greater Manchester Clean Air Plan (GM CAP) is to remove all roadside concentrations of NO_2 that have been forecast to exceed the legal limits in the shortest possible time in line with Government guidance. Greater Manchester expects once the CAP has been implemented, by 2024, roadside NO_2 limits will have been met across Greater Manchester.

The GM CAP consultation was held between Thursday 8th October and Thursday 3rd December 2020 for a period of eight weeks. The wider consultation sought views about the proposed Clean Air Zone (CAZ), and funding packages designed to support owners of non-compliant vehicles upgrade. The consultation provided an opportunity for all those with an interest in the proposals to provide feedback.

In order to get a greater depth of understanding of the possible impacts of the proposals, Transport for Greater Manchester (TfGM), on behalf of the 10 Local Authorities of Greater Manchester, commissioned AECOM to manage and moderate a series of qualitative research to run parallel with the main public consultation.

Research Objectives

Qualitative research was undertaken with groups most likely to be affected by the proposals This research ran alongside the consultation survey and explored in detail perceptions of the proposals, the impacts of the proposals and thoughts on the proposed funding assistance to mitigate potential impacts. The outputs will complement the formal consultation findings.

The key questions to answer from the qualitative research were:

- Understanding the scale of the air pollution challenge, who or what they believe contributes the most to air pollution in general and how they are, or may be, personally affected by it;
- The response to both the charging and mitigation measures being proposed in the CAP, e.g. types of vehicles affected and unaffected, charges by vehicle type, funding available for these affected vehicles, and interest in taking up packages of support;
- The impacts of each of the measures on them personally and / or their business and / or economic opportunities;
- A review of the response to the measures;
- When more information is offered, whether the proposed support is adequate to reduce any adverse economic impacts on them personally and / or their business;
- The impact of Covid-19 on their current travel behaviour; and
- The impact of Covid-19 on their ability to respond to the charging CAZ and the potential scale of funding support available.

Methodology

Qualitative research offers additional value by giving a voice to the type of respondents who may be impacted by the introduction of a CAZ, whether directly or indirectly. The use of qualitative research enhances understanding of the expected impacts, for example, understanding how people are going to respond to the CAZ requirements.

Sample Profile

In consultation with the client, the research was split into two groups of individuals and businesses as follows:

Twelve focus groups with members of the public

- Ten groups with residents from across all districts of Greater Manchester.
- Two groups with individuals who live outside the Greater Manchester region, but travel into the region

Ten focus groups with businesses who have at least one non-compliant vehicle

- Seven groups based within the Greater Manchester region.
- Three groups based outside the region but undertake work or travel within the region for business purposes.

In addition to the groups, AECOM undertook six depth interviews with businesses who were unable to attend a group setting, to ensure the range of required business types were included.

Greater Manchester has been directed by Government to introduce a charging CAZ Class C across the region. This means owners or registered keepers of the following vehicle types will be required to pay a daily charge for driving into or within the zone. Therefore, we spoke to the following people:

- Licensed hackney carriages;
- Licensed private hire vehicles (PHVs);
- Buses;
- Coaches;
- Minibuses;
- Light Goods Vehicles (LGVs), such as vans; and
- Heavy Goods Vehicles (HGVs).

The charge is applicable unless the vehicle is compliant with the vehicle emission standards set out in Government's CAZ Framework.[1]

Individuals' Profile

A total of 72 individuals took part in the qualitative research about the GM CAP. **Table 3.1** shows the respondents' demographic profile and other key criteria for each group.

[1] https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/863730/clean-air-zone-framework-feb2020.pdf

Table 3.1: Demographic Profiles of Individuals' Groups

Location	Type of Respondent	Criteria
***Group 1*: Outside** Greater Manchester, **but travel into region**	Aged 18-40 Mix of genders	Predominantly bus and taxi users within the Greater Manchester region
***Group 2*: Outside** Greater Manchester**, but travel into GM Region**	Aged 40+ Mix of genders	Predominantly bus and taxi users within the Greater Manchester region
***Group 3*: Inside** Greater Manchester	Aged 18-40 Mix of genders Mix of Black and Minority Ethnic (BAME) All have young children or families	Mix of modes used within Greater Manchester Live in areas of poor air quality Mix of income levels
***Group 4*: Inside** Greater Manchester	Aged 18-40 Mix of genders Mix of BAME All have young children or families	Mix of modes used within Greater Manchester Mix of income levels
***Group 5*: Inside** Greater Manchester	Any age Mix of genders Mix of disabilities	Taxi and PHV users at least once a fortnight
***Group 6*: Inside** Greater Manchester	Aged 41+ Mix of genders Mix of respondents with respiratory conditions	50% from poor air quality areas and 50% other areas
***Group 7*: Inside** Greater Manchester	Aged 18-45 Mix of genders Mix of respondents with respiratory conditions Young children and families	50% from poor air quality areas and 50% other areas
***Group 8*: Inside** Greater Manchester	Aged 18-34 Mix of genders Mix of BAME respondents	Mix of modes used From poor air quality areas Low income areas
***Group 9*: Inside** Greater Manchester	Aged 35+ Mix of genders Mix of BAME respondents	Mix of modes used From poor air quality areas Low income areas
***Group 10*: Inside** Greater Manchester	Aged 18-34 Female only participants	Bus and taxi / PHV users within Greater Manchester region Low income areas
***Group 11*: Inside** Greater Manchester	Aged 65+ Mix of genders	Bus and taxi users within Greater Manchester region Low income
***Group 12*: Inside** Greater Manchester	Any age Mix of genders	Have non-compliant vehicle e.g. motorcaravan / horsebox
***Depth 1**: Outside* Greater Manchester**, but travel into region**	Female	Horsebox owner

*this respondent could not attend their group due to unforeseen circumstances so was interviewed at a later date

Businesses Respondents' Profile

A total of 38 business respondents took part in the GM CAP qualitative research and the breakdown can be seen in **Table 3.2**.

Table 3.2: Business Group Sectors

Group / Sector	Criteria
Group Business 1 (B1): Agriculture / Construction / Waste management	Outside Greater Manchester, but travel into region
Group Business 2 (B2): Minibus / Coach	
Group Business 3 (B3): Retail	
Group Business 4 (B4): Agriculture / Construction / Waste management	Inside Greater Manchester At least three districts of Greater Manchester represented
Group Business 5 (B5): Night-time economy (food / retail / hospitality)	
Group Business 6 (B6): Retail	
Group Business 7 (B7): Manufacturing / HGV	
Group Business 8 (B8): Company / owners of coach / minibus, including charities (e.g. voluntary sector)	
Group Business 9 (B9): Van owners (construction / retail)	
Group Business 10 (B10): Van owner (mix e.g. mobile gardener / florist / hairdresser)	
Depth 2: Waste management business	Inside Greater Manchester
Depth 3: Manufacturing business	Inside Greater Manchester
Depth 4: Coach / Minibus business	Outside Greater Manchester, but travel into Greater Manchester
Depth 5: Plumbing and Gas business	Inside Greater Manchester
Depth 6: Butchers business	Outside Greater Manchester, but travel into Greater Manchester

Recruitment

All participants were screened to ensure they met the eligibility criteria for the focus group or depth interview they were being recruited for. Anyone who worked in public transport, for TfGM or the 10 GM Local Authorities was excluded from participating in the research. Participants were told the purpose of the research was to understand their awareness and views of the GM CAP and the impact on them and others.

All groups with individuals and businesses were structured to last up to one hour and 30 minutes to allow comprehensive coverage of the topics. Five participants were recruited for each group and all groups comprised of three to five participants. Owing to the Covid-19 pandemic and constraints on staging traditional face-to-face focus groups in person, the groups were completed virtually (using Microsoft Teams or Zoom). The virtual nature of the groups meant it was considered more practical to have more groups with fewer respondents in a group to ensure the same level of detail and discussion was achieved as would be in a more traditional face-to-face session.

In addition to the groups, six businesses took part in depth interviews using Microsoft Teams, Zoom or by telephone, in which a similar discussion guide to the one used in the focus groups was utilised. The content was tailored to them, their trade and the industry. Interviews were completed one-on-one with an experienced moderator and lasted up to 60 minutes.

Discussion Guide

The basis of the discussion was a topic guide, which was developed prior to the research being undertaken. This acted as an aide-memoire to the moderator to ensure all topics were covered during the focus groups. A copy of the guides can be found in **Appendix A and Appendix B**. Topics covered included:

- Air quality;
- CAP proposals;
- CAZ;
- Vehicles and exemptions;
- Funding and charging;
- Impact on businesses with affected vehicles;
- Impact on individuals with affected vehicles;
- Impact on individuals without affected vehicles; and
- Impacts of Covid-19.

Each moderator was provided with the following documentation alongside the discussion guide:

- Summary of the key information in the consultation documents e.g. boundary, funding etc. to ensure all respondent have had the same information;
- Consultation document; and
- Frequently Asked Questions (FAQs).

Before the programme of groups and depth interviews began, TfGM and AECOM held a joint briefing session for all moderators to explain the objectives of the research and outline the details and materials needed to undertake moderation of the groups. This ensured consistency across all groups.

Moderation

The focus groups and depth interviews were moderated by trained and experienced moderators. The moderator stimulated the discussion using their knowledge of the study topic, with the assistance of a discussion guide, a list of FAQs and slides with key information on, taking into consideration the research objectives.

Throughout the discussion, the moderator introduced different topic areas (based on the discussion guide), information on the range of proposals to promote discussion and debate. Participants were encouraged to discuss the issues within the group and not simply respond to a set of questions posed by the moderator. Participants were asked to give reasons for their points of view and respond to others they may or may not agree with.

Findings

Air Quality

The first task within the focus groups was to understand respondents' awareness and opinion on air quality, in general, within Greater Manchester. Following this, the focus group sought to understand if there is any impact on the respondents or their business and what respondents' views are on air pollution currently and whether they believe action needs to be taken.

Air Quality - Individuals

The consensus amongst members of the public was the level of air quality is generally poor in Greater Manchester and needs to be improved. Many felt there was a noticeable difference between urban areas in GM and more rural areas on the periphery and outside the region.

> *"Grim, if you go outside of Manchester, there's a grey cloud that hovers over Manchester. If you go anywhere, I go walking in the Peak District a lot and you can see Manchester and, honestly, there is just a grey cloud over Manchester all the time. It is definitely very badly polluted." (Public, G10, Female only group, Aged 18-34, Bus/ Taxi users, Low income areas, Inside GM)*

However, a handful of respondents had previously lived in other big cities and stated the air quality seemed better in Manchester compared to other cities, such as London.

Some respondents in the groups had respiratory illnesses, such as asthma. Several respondents with asthma said it was noticeable when the level of air quality was poorer, through changes in their breathing.

> *"So, I am asthmatic, so once there's a change in, not just smells, like dust, anything, there's just the change and it's not clean, I can tell instantly and even when someone else cannot smell it, my body already tells, I can feel it. So, for that reason, I'm concerned as well about air pollution and so many, actually, health conditions are brought on by air pollution and most people don't know. So yeah, it's very important to me." (Public, G8, Mix of modes used, Live in poor air quality areas, Aged 18-34, Inside GM)*

> *"Yeah, the thought process was, I have asthma as well, and I noticed the difference. I used to live closer to town last year, and now I've moved back with my in-laws and it's kind of outside of Stockport, and my asthma got better because of the air quality, you can clearly tell the difference, so I was just nodding to that." (Public, G4, Mix of modes used, Mix of income levels, Aged 18-40, Inside GM)*

When asked who is responsible for improving air quality, this was met with a range of responses. Some respondents stated everyone plays a part in being responsible.

> *"I personally think we're responsible. There's only so much the Government can do and I think it's important that we …, lots of things come down to education and if we educate ourselves on certain things, just on what it is in the first instance and the consequences of it, then we'll know to individually do what we can to help. There's only so much, like I said, they can do. There's so many areas to focus on, so it's like the little bits we all do sums up to a lot." (Public, G8, Mix of modes used, Live in poor air quality areas, Aged 18-34, Inside GM)*

Others felt specific groups or organisations were more responsible than others for improving air quality.

> *"I would say maybe it's more the council, though, because they have their facilities to be able to put in initiatives that they want to use, like what sort of fuel the bus has, it's not our responsibility, sort of thing, so I'd say, yeah, everyone does have responsibility, but there's certain people that can facilitate it more." (Public, G10, Female only group, Aged 18-34, Bus/ Taxi users, Low income areas, Inside GM)*

When asked what barriers there are to improving air quality, many respondents referenced general time pressures in their lives as reasons why they chose to travel by car rather than a more sustainable mode.

> *"I always book trains home and then don't give myself time to get the bus or whatever, and then I end up getting an Uber instead or something, stuff that you could avoid, but you know." (Public, G10, Female only group, Aged 18-34, Bus/ Taxi users, Low income areas, Inside GM)*

> *"I think daily pressures, like everything has to be very instant and quick, so if you have to get somewhere you can't afford to like take your time cycling or this or that, you have to just like be there and you're rushing to take your kids to school or whatever, don't know what everyone else's situation is, things like that." (Public, G10, Female only group, Aged 18-34, Bus/ Taxi users, Low income areas, Inside GM)*

Air Quality - Businesses

All respondents in the business focus groups were asked what they thought of the current air quality in Greater Manchester, and there was a mixed response to this question across the groups.

Some respondents felt the air quality in Greater Manchester is not as bad as elsewhere, whilst some respondents stated compared to rural areas in and close to Greater Manchester, it is worse within the more urban areas of Greater Manchester.

> *"I would have thought it's not good, it's a very congested area, high volume of traffic, so I would have thought the air quality isn't good. Just speaking as a layman, it's an inner city, so yeah, I'm probably stating the obvious there. (Business, Minibus / Coach, B2, Outside GM)*

Most respondents thought the very centre of Greater Manchester (i.e. the Regional Centre) was the worst area for poor air quality and cited peak traffic and congestion as the source for this problem.

> *"Well, I would say clean air would be moving further towards the countryside. The further you move towards the trees and the greenery, the cleaner the air is going to be. If you're in a congested area, such as an inner city with peak time traffic, you're not going to get that. How can you produce more clean air within an inner city? I don't know." (Business, HGV / LGV, B1: Agriculture, Construction, Outside GM)*

Many respondents stated air quality and air pollution is a problem, but although they recognise that, it is not necessarily a priority to them or their business.

> *"Definitely an important issue, it's got to be up there as an important issue, you know, with climate change and with moving into a market and an industry that's growing year on year and producing more pollution, it has to be something that we've got to talk about. We can't ignore it," (Business, HGV / LGV, B1: Agriculture, Construction, Outside GM)*

> *"I recognise that it is an issue, and we try to make sure our vehicles are cleaner than others, but it isn't a priority compared to some issues. Keeping the business afloat just takes priority." (Business, B3: Retail, Outside GM)*

Some businesses felt quite strongly about what causes air pollution and focused on two types of vehicles: cars and HGVs, as the main contributors to poor air quality.

> *"I think the problem is the amount of cars on the road. You've only got to see, because at the minute, there's hardly any cars on the road, so we're not stuck in traffic, so we're not causing as much pollution, and my view is the amount of cars on the road. They need to tackle that, because that's the big issue." (Business, Minibuses / Coaches, B8, Inside GM)*

> *"Surely the big lorries and vans are contributing to the pollution more than other vehicles?" (Public, G12: Campervan / Horseboxes)*

Some respondents also highlighted other issues, such as air traffic, factories and industries as contributors to poor air quality. A couple of people felt that the priority should just be the more damaging vehicles, not who owns them or who they belong to.

> *"Surely if you want the polluting vehicles off the road, surely the priority is you'll be taking the oldest ones off the road first, irrelevant of whether it's a big firm or a small firm operating them." (Business, HGV, B7, Manufacturing / HGV transport, Inside GM)*

Some respondents observed when cars were off the road during the first lockdown the skies were clearer, and less air pollution was evident.

> *"I think we should be concerned about it. Just because if you notice when we have to lock down, the first lockdown, everything was locked, cleaner skies were a lot bluer, and there wasn't this heavy polluted sky anymore." (Business, B3: Retail, Outside GM)*

A handful of businesses felt they do have to consider their carbon footprint as part of their business operation, and their clients are also interested in that too, so it is something of relevance within their business. This was mainly amongst HGV vehicle owners and any vehicles registered for the Fleet Operator Recognition Scheme (FORS) program.

> *"As a company, we are aware of our carbon footprint. Most of our clients are, they make demands on us regarding that., and they want to know everything we do, the vehicles we use, our carbon footprint etc.". (Business, B3: Retail, Outside GM)*

Whilst some businesses felt everyone has a responsibility for improving air quality, some businesses felt it was the Government's issue rather than theirs.

> *"Personally, I would say central Government. The problem, when central Government rolls it all out to the individual authorities, you get a very much scattergun approach with piecemeal plans going on, depending on where you live. I would say the priority should be for the central Government to set one process and apply it to all the regions, but it seems a very much opposite approach that they're taking." (Business, HGV / LGV, B1: Agriculture, Construction, Outside GM)*

Awareness of the CAP Proposals

The number of respondents in either the individuals or business groups aware of the CAP proposals was low. As a result, many respondents did not initially understand how they could be impacted by the CAP proposals.

Awareness of the CAP - Individuals

A lot of the individuals were surprised by the news of these proposals and were taken aback by who would be liable to pay a charge. Many felt the general public was part of the problem too.

> *"I think it's strange because there's so many more people, there's so many more cars and HGVs and vans for driving into town, and I thought you're meant to be encouraging the people, not just the businesses. It feels like you're targeting just businesses, rather than individuals, and I think it's the individuals that need to actually do the groundwork, and we all need to contribute. It's not really going to have any effect on people, really." (Public, G3: Aged 18-40, All with young families and children, Mix of modes used, Live in poor air quality areas, Inside GM)*

> *"I'm surprised that it's so far on and I've heard nothing about it, like when I got the thing that said compliant vehicles, I didn't even know what one of them was. But I think there'll be a lot of people who will suddenly find this thrust on them and they'll think where's this come from and I don't think it's been publicised very well." (Public, G14: Campervan / Horsebox)*

The term 'Clean Air' was not completely unfamiliar to many across the groups, but when pushed on detail or any sort of explanation as to what the proposals could involve, many did not know or could not tell the moderator any further detail.

> *"Something to do with bringing in restrictions and about the clean zones or something right?" (Public, G8, Mix of modes used, Live in poor air quality areas, Aged 18-34, Inside GM)*

Some individuals felt this was a positive step, but it wasn't potentially going far enough.

> *"It's definitely a step in the right direction, but if private cars aren't charged and then maybe prices go up, I don't see how it would limit peoples travel or impact it." (Public, G10, Female only group, Aged 18-34, Bus / Taxi users, Low income areas, Inside GM)*

> *"I think because private vehicles aren't banned and stuff like that or are not going to be charged, I don't think there'll be a positive. There'll probably be a slight positive effect, but some people will have to give up their vehicles, because they can't do that type of work anymore or whatever, it'll have to change. I think there'll be some effect, but I don't think it'll be the massive effect that they expect, or they hope." (Public, G3, Aged 18-40, All with young families or children, Live in poor air quality areas, Inside GM)*

> *"In my opinion I don't think it'll change anything, as long as you're allowing private cars in and stuff I don't think it'll change anything." (Public, G3: Aged 18-40, Mix modes used, Poor air quality areas, low income, Inside GM)*

Due to the lack of knowledge on the proposals, some respondents made assumptions about what they thought the proposals referred to:

> *"Yes, I was aware of it, but I thought it was more like a congestion charge than a Clean Air Plan. But I think I read something about it in an Uber, actually. I was taking an Uber into Manchester, and I think there was like a small laminated card in the back of the taxi, because obviously taxis are all massively affected by this." (Public, G12: Campervan / Horseboxes)*

> *"Yes, I think in principle that it's a really good idea, because it is tackling the issue head on. It's really hard to know how it would work in practice, but I think the principle behind it was really good." (Public, G8, Mix of modes used, Live in poor air quality areas, Aged 18-34, Inside GM)*

Some individuals hoped businesses knew more about the proposals than they did, because they were going to need time and economic investment to meet the proposals. They felt increasing awareness of the proposals is the first step.

> *"When was this proposal made? Because I'm just thinking for businesses to be able to react to this, it's just the financial impact and the operational impact it may have, so it just depends how quick you've got to react, because you'd be gutted if you bought a new fleet of vehicles last year, and then like in eighteen months' time, we'd have to change them all again. (Public, G4, Mix of modes used, Mix of income levels, Aged 18-40, Inside GM)*

Awareness of the CAP - Businesses

The awareness of the proposals amongst business respondents was mixed. A small number had knowledge of the proposals and its details, whilst slightly more were aware of the proposals but did not know much of the detail. There were several businesses across the groups who were not aware the introduction of the CAZ is imminent.

For some of the businesses, their initial reaction was they would "park" some vehicles or use only compliant vehicles for work within the region.

> *"Yeah, HGVs, yeah. We would have upgraded some this year, but with the current situation, we've put purchases on hold and until, you know, we know what's in front of us, we're not going to go out and replace all those vehicles, you know. If it's quiet in the new year, we'll look at parking some up, rather than replace them." (Business, HGV, B7, Manufacturing / HGV transport, Inside GM)*

Some respondents felt the CAP was being brought in as a replacement to the congestion charge and felt it is only a matter of time before privately owned cars are included in the charges.

> *"Is this just the charge they tried to bring in a few years ago? Is it just a congestion charge under another name?" (Business, LGV, B5, Night-time economy, Inside GM)*

Some businesses had some awareness of the plans but did not realise the extent of scale of the proposals.

> *"I thought it would be for the sort of like inside the M60, I didn't realise it was the whole of the Greater Manchester area." (Business, HGV / LGV, B1: Agriculture, Construction, Outside GM)*

Some businesses felt others were unaware of these proposals and were concerned as they could significantly affect some people's livelihoods.

> *"The fact that there's people out there that have commercial vehicles and they don't have a clue what's going on? The impact that this could make on a company, people's jobs, it's their livelihoods at the end of the day and with what's going on at the minute [Covid-19], I think they need to have a look at timing." (Business, HGV, B7, Manufacturing / HGV transport, Inside GM)*

Clean Air Zone (CAZ)

As set out in the consultation document, a major component of the CAP proposals is the introduction of a Greater Manchester wide CAZ, which is a designated area whereby certain higher pollution vehicles would pay a charge to drive in. Vehicles which do not comply with the required emissions standards would pay a daily charge for each day they drive into, out of, within or through the zone.

Within these proposals, the CAZ is scheduled to launch in Spring 2022 and will operate 24 hours a day, seven days a week. Vehicles to be charged if they are not of the required emissions level include buses, vans, HGVs, hackney carriage and PHVs. It should be noted private cars are not included in the Greater Manchester scheme.

Impact of the CAZ - Individuals

Some individuals struggled to initially understand how the CAZ would impact them. Through discussion in the groups, some respondents felt it could have an indirect impact on them through charges being placed elsewhere.

> *"But what I'm thinking is, if public transport does get more expensive and private cars are not charged, that means it might backfire. Obviously, I don't know too much about it, because then people like myself will be more likely to try and get a car, rather than carry on using public transport. So, then there'll be a lot of emissions from the private cars, it might increase more, because as public transport gets more expensive, it'll definitely put people off." (Public, G10, Female only group, Aged 18-34, Bus / Taxi users, Low income areas, Inside GM)*

> *"I feel it's not going to have a very great impact, to be honest, because it's not charging private cars. It's only, you know, buses, vans, taxis, that kind of thing. I think, you know, it's not going to have a massive impact, because what they'll pay in the charge will be passed on to their customer. So, I don't think it's going to reduce any vehicle usage that I can see. I think we're going to have the same amount of usage. I think it'll just end up being more expensive for the customer." (Public, G2: Aged 40+, Bus / Taxi users within region, Outside GM)*

> *"I definitely agree it would be better to have cleaner air, and that's something I would be happier about, but I would be interested to know, for someone like me, how is the clean air charge going to affect the price of my bus ticket, like is that going to be swallowed up or, probably, they'll just pass it on to us." (Public, G8, Mix of modes used, Live in poor air quality areas, Aged 18-34, Inside GM)*

Impact of the CAZ - Businesses

The response in the business focus groups was more negative than in the groups with individuals, as the overarching opinion was businesses are being penalised, whilst individuals and their vehicles, which they felt contribute as much to poor air quality, are being allowed to "carry on as normal".

> *"Surely, I wouldn't go out there and buy an old, you know, a dead old car which is pumping out a load of fumes and still be exempt from the scheme, surely? If so, then surely the scheme is flawed, and we are just being penalised?" (Public, G8, Mix of modes used, Live in poor air quality areas, Aged 18-34, Inside GM)*

Many respondents felt cars and vehicles will still be travelling through the region and on the motorways and not being penalised, but still contributing to the poor air quality levels.

> *"So, you've got a situation where somebody with an older van, driving down their own street could be charged, whereas somebody can drive that same van all the way across the region on the motorway, which goes right through urban areas and they're not charged?" (Business, LGV, B9, Construction / Retail, Inside GM)*

Some respondents in the groups were surprised at the size of the area:

> *"I mean I thought they would more likely do the M60. Like the M60 is a ring road, because looking at the map before, there wasn't much the other side, out of the M60. Wigan and Bolton and Bury. Yeah, poor old Bury Market, they're a bit stressed about this, because it's going to have quite an effect on them." (Business, Minibus / Coach, B2, Outside GM)*

Some businesses felt the CAZ could make them go out of business due to the impossible task ahead of them when this comes in.

> *"We might as well close the doors because there's no way we can afford to run our vehicles at a daily charge, on top of what we're losing already." (Business, Minibuses / Coaches, B8, Inside GM)*

> *"We're the same, it'll put us out of business. Hundreds of children are going to be without transport and then they [the big companies] will charge an absolute fortune because they'll be the only ones with the vehicles. Where does this money come from? You know what I mean." (Business, Minibuses / Coaches, B8, Inside GM)*

A handful of respondents in the groups mentioned specific reasons as to why the zone does not work for them or for specific locations.

> *"You see I don't go into the region every day for work. But I do live in Salford, so every time I leave home because our shop is based up in Chorley, I will be charged and yet I won't be able to get any funding support because I work outside GM so I will be charged just to get to work." (Business, B3: Retail, Outside GM)*

Some mentioned Manchester Airport and whether charges would be incurred for accessing the airport from outside of Greater Manchester. This coupled with the airport parking charges could result in an expensive journey to the airport.

> *"Yes, but is that going to be the same, because going into Manchester Airport, if you did it as soon as you came off the M56, there's also then narrow, you know, Greater Manchester roads." (Business, Minibus / Coach, B2, Outside GM)*

Times and Management of Operation

The proposed times of operation caused some concern with some of the business respondents due to how the operation hours would impact on their businesses.

> *"If I'm working at night and overnight, i.e. from 9pm until 3am, then I'm going to get charged twice for the one shift? That will eat into my income, especially when those times are the main shifts I do. "(Taxi Driver Owner (Hackney), Salford)*

> *"But how will this work for night drivers? How will the charge work? Surely that means as a night driver it will hit me more? Day drivers will any be charged one per shift. We will get charged twice potentially depending on how many night shifts we do back to back." (Licensed PHV owner – own my vehicle, Manchester)*

None of the respondents in the individual groups had comments on this particularly. However, many respondents wanted more detail on the practicalities of how this was going to work, such as questions around:

- How will I be charged?
- How will it be enforced?
- What happens if I use my vehicle for both personal and commercial use?
- *"But I use my van for personal trips though? Am I going to be penalised for those trips also?" (Business, LGV, B10, Plumber, Inside GM)*
- Will you be able to pay a pass for a month to avoid doing this every day?

> *"Is this going to be charged through like a daily charge with cameras involved to pick up vehicles?" (Business, Van, Inside GM)*

> *"But I use my car for other trips than work. How will that work for me? I don't understand. Will I get charged for using the same car to go the shops or pick up my kids?" (Licensed PHV driver – own my vehicle, Rochdale)*

In some groups, it was felt to be unreasonable to ask small businesses to prepare for this change in such a short timeframe, especially given the current circumstances around Covid-19. They felt the CAZ could be implemented later to allow small businesses the opportunity to prepare, given some businesses in the groups were not aware this was coming at all.

> *"From my point of view if they made the M60 the boundary and gave us say ten years that would make it something that we could work towards, rather than just throwing in the towel. You know where you'd only pay if you went inside the M60." (Business, Minibuses / Coaches, B8, Inside GM)*

Vehicles and Exemptions

There is a list of proposed permanent exemptions, temporary exemptions and discounts compiled by GMCA as part of these proposals that were showed to respondents.

Permanent Local Exemptions

Many of the individuals agreed with the list of exemptions and felt the correct vehicles were on the list.

> *"They should be exempt anyway, yeah, yeah. I mean you're not going to see many tanks driving round Manchester, are you? Obviously, ambulances and police, they've got to be exempt from it." (Public, G2: Aged 40+, Bus / Taxi users within region, Outside GM)*

However, some individuals felt the list was too long, and many should not be exempt in order to reach the targets.

> *"Because the objective is to promote clean air into the city centre or Greater Manchester even and yeah, you'd need to include everybody and I know that includes myself, because I've got a vehicle of my own, but yeah, if that's the purpose of it and the intention is to reduce, yeah, sort of promote clean air and reduce CO_2 emissions and whatnot, yeah, then it would include every driver and promote the electric vehicles and low emission vehicles." (Public, G3: Aged 18-40, All with young families and children, Mix of modes used, Live in poor air quality areas, Inside GM)*

Many businesses questioned the vehicles currently included in the list and why those vehicles were included.

> *"So, if you look permanent exemptions, Military Vehicles, so the Government are saying our vehicles are going to be exempt, emergency vehicles, so that's Police, Vehicle and Operator Services Agency (VOSA), fire engines all exempt because that's their money, and then further down you've got a Showman's Guild Vehicle. So why should someone with a fair not have to pay when we have, and surely what we do is more important than a fairground once a year." (Business, Minibus / Coaches, B8, Inside GM)*

> *"Historic vehicles are gas guzzlers. They produce more pollution than like a modern car." (Business, HGV / LGV, B7, Inside GM)*

During the discussions respondents questioned what was defined as a specialist vehicle and queried who defined it.

> *"Looking at that information there, it says there's not even a national database of these vehicles. So, who's going to have the final say on what is a special vehicle that's exempt?" (Business, HGV / LGV, B7, Inside GM)*

> *"If you're a scaffolder and you've got a twelve ton truck, that is your specialist HGV, because it saves you having a group of five lads hand boarding a load off. So, what you define as specialist and what I define as a specialist is like you say, it's open to interpretation." (Business, HGV / LGV. B7, Manufacturing / HGV Transport, Inside GM)*

Specifically, with the leisure HGV vehicles, respondents felt the charging should not be applicable to them and they should be permanently exempt from the charges as they are not being used commercially.

> *"You know, I'm either going to have to get rid of my box, which I've spent a lot of time and effort saving up for and converting to give my daughter the facilities I never had as a child, you know. I bought my first horse at eighteen, you know, my daughter's grown up with horses and to be able to give her and keep her off the streets by giving her such an all-encompassing hobby is something I always wanted to be able to do. This has the potential to throw that completely up in the air and to change my box down to a 3.5 ton van, which would still end up being charged, but is a possibility, again is not viable." (Public, G12: Campervan / Horseboxes)*

> *"I think a simple way around this would be to state that for vehicles like mine and like the campervans and that sort of thing is they only get charged if it's being used in commercial use." (Public, G12: Campervan / Horseboxes)*

Temporary Local Exemptions

Many of the respondents did not have specific opinions on the temporary exemptions. One respondent felt some industries were not being treated the same as others which they felt was unfair, unrealistic and impractical.

> *"I can't see there's anything missing, but like they seem at the moment to like be treating taxis and buses the same and from where I'm sitting I think it's a little bit greener to get the bus, than to take a taxi just for yourself. So, I'd be interested to know if they're going to treat them differently." (Public, G8, Mix of modes used, Live in poor air quality areas, Aged 18-34, Inside GM)*

> *"I don't see why an operator who's in the area should have an advantage over someone that isn't. That nine months is, I mean nine months isn't going to make much difference anyway, but we should all be taken in at the same time. It's irrelevant where you're based, if you've got a coach that's going into Manchester, whether you're in Manchester or out of Manchester, it should be compliant from the rollout date of spring 2022." (Business, Minibus / Coaches, B2, Outside GM)*

Charging

All respondents, both businesses and individuals, were asked to provide views on the proposed charges for all vehicles. There was a mixed response across the groups.

Individuals

Most of the individuals thought the charging would encourage the changes needed to improve air quality, which they thought could only be a positive step in the longer term.

> *"So, I think it's good, because as part of what the Government is doing or how they can, because they can't necessarily control people's actions, but maybe a charge will. So, I think it's good, also if I'm thinking about it from the angle of my health as well, you know what areas are clean as well, so I think that's really good in that instance, yeah." (Public, G8, Mix of modes used, Poor air quality areas, Low income, Aged 18-34, Inside GM)*

However, some respondents also thought it was interesting not all vehicles were included and questioned some of the vehicle types that had been selected for exemption.

> *"I think it's strange because there's so many more people, there's so many more cars and HGVs and vans for driving into town and I thought you're meant to be encouraging the people, not just the businesses. It feels like you're targeting just businesses, rather than individuals and I think it's the individuals that need to actually do the groundwork and we all need to contribute, it's not really going to have any effect on people, really." (Public, G3, Mix of modes used, Poor air quality areas, all have young families or children, Aged 18-40, Inside GM)*

> *"My first thought was like taxis and buses, they're like huge vehicles and I don't think that the companies are going to pay to upgrade them and you know people that are like taxi drivers, if they've got their own taxi, maybe they can't afford to upgrade it to something that's suitable. So, they're probably just going to keep paying the charge every day and that's probably just going to get passed on to the people that pay for the services." (Public, G8, Mix of modes used, Poor air quality areas, Low income, Aged 18-34, Inside GM)*

Some respondents felt it was inevitable they would take some of the charges in the fares they pay going forward.

> *"I mean you might get taxi prices and bus fares and things like that going a little bit higher for us now." (Public, G5: Taxi / PHV Frequent Users, Inside GM)*

Some of the leisure HGV vehicle owners indicated they would avoid the region entirely as it was not worth going into the region for the charge and they can't change their vehicle.

> *"The charge means I just won't go into the region. I won't attend some of the riding schools there and I now won't go to the garage that I have gone to for years because he is in Urmston, so I would be charged. It is a lot of money, but other people will lose out too." (Public, G12, HGV Horsebox Owner, Outside GM)*

Businesses

Many of the businesses felt the charges would impact on their business costs and could affect existing contracts that will still be in place through the implementation of the CAZ.

HGVs

Many of the HGV businesses were unaware of the proposed charge for their vehicle to travel within the CAZ. Many felt the investment in getting these vehicles is a difficult enough situation without having to pay a charge to use it also.

> *"Yeah, because obviously an HGV wagon, you don't buy a new scaffolding wagon, anyway, do you know what I mean, they cost a fortune, but anything above like a 15*

plate at the minute, you're going into like 20 grand and things, so I think I'll just hold back for five months. If I get money off it and it's going to reduce the charges that I'm going to be getting, because like I say, I could have nine vehicles out a day, one's an HGV and that's going to cost me £150 a day, it's dearer than my fuel, that." (Business, LGV / HGV, B4, Agriculture / Construction, Waste Management, Inside GM)

For those companies with more than one HGV vehicle, from mental maths during the group, they believed those with a fleet would struggle to maintain the business with these charges in place, especially if they cannot afford to upgrade.

We've got seventeen on the road at any one time, and ten of them at £60 per day, that's £600 per day and that would close the business down straightaway. I know there are some companies who have that number of vehicles who are just about breaking even." (Business, Depth, HGV, Waste Management)

Coaches / Minibuses

Many of the respondents were quick to work out the daily or weekly costs for them with the charges and how it would impact their businesses.

"You've not got the £60 / day in your contract to just lose, we just haven't got it. We're not being pathetic and just saying it, it's actually true. We haven't got that much profit in them contracts, there's not a lot of profit in them to begin with." (Business, Minibuses / Coaches, Inside GM)

They felt some of the existing contracts do not allow for these charges to be brought in and would cause already tightly costed jobs to be even more tight.

"We're basically staying afloat with the school's contracts like the other guys are. We are just covering our costs really. The school's contracts don't really bring in any sort of profit, if any, but with the private work going as well and we don't know when it's coming back, we're all in the same boat really." (Business, Minibuses / Coaches, Inside GM)

Several respondents felt coaches and minibuses were being unfairly targeted regarding the charges, especially as they can take several passengers at once, whilst often a car has a single person in it. It felt like they were only selecting certain industries which is an issue when they perceive others contribute to the air quality issues just as much.

"My concern is the timescale and I think it is unfair to target industries like us, without targeting cars and all the other vehicles, because they're the ones that cause all the problems, we all see it. Hundreds of cars with one person in and they're paying nothing." (Business, Minibus / Coaches, B8, Inside GM)

LGVs / Vans

Respondents with small businesses, or sole traders with a van felt these charges could significantly affect their weekly costs.

"Well, somebody who's a small builder or has their own small business, that's £50 a week in that van, that's £250 a month on top of your road tax and all the other taxis." (Business, LGV, B9, Construction / Retail, Inside GM)

Some stated they would need to upgrade as the alternative of paying a daily charge would be uneconomical for them.

"£60 a week, if I don't use it on a Sunday. It means I have to change the van, it's simple enough. It's not a choice, you can't take a £60 a week, that's £260 on a calendar month, isn't it, that would pay for a new van." (Business, LGV, B10, Inside GM)

A couple of respondents felt this could cause businesses to use more lease vehicles rather than buying a new vehicle.

"If it's kind of pushing helping lease firms and things to be honest with you, which it might be a way to go, but I've always bought my stuff outright myself." (Business, LGV, B10, Inside GM)

Taxi / PHV

Some felt the charges for taxi / PHV drivers was a step too far in the current climate and it would push them out of the industry potentially.

"The industry is already struggling. Drivers won't have that sort of money. This will force some of them to leave the industry." (Hackney driver – own my vehicle, Tameside)

Many drivers felt this was just another cost they must cover or pass onto the customer.

If I only do that one job, I drive a minibus, if I only do that one job, that minibus that I charge £35 for, that I've paid £6 to pick up at the airport, I'm now paying £7 to have my vehicle on the road, I'm going to pay an insurance and I'm paying fuel, I've got charge that customer pretty much, I have to charge that customer, the price will have to go up from £35 to £48, just to justify how much I earn off it at the moment." (Licensed private hire driver – own my vehicle, Trafford)

A couple of drivers felt a charge on some vehicles and not others means some drivers will not be as competitive as others.

"Especially when you're in competition with everybody else for being more competitive with your prices and everything and then getting charged on top of that, I don't know, it's just unfair. I totally appreciate the green air, I totally appreciate that everybody wants to have clean air and we need to get our emissions down and everything, but it just feels that it should be a national thing for everybody to do and not just one group in society to do it." (Licensed private hire operator – own our vehicles, Wigan)

Funding

Across the groups, respondents were shown the potential funding options available and were asked for their opinions on them.

Clean Bus Fund

Applicants would need to demonstrate they are the registered bus service operating in Greater Manchester and have been for at least 12 months prior to application for the funding. As part of this qualitative research, a bus / coach / minibus group based both inside and outside Greater Manchester were included. Individuals in the members of the public groups were also shown information about this funding.

Individuals in general were positive about the funding across the different vehicles, recognising their flexibility and role in taking people to multiple destinations and removing lots of separate cars from the roads.

"Yes, you know, it's really positive, you know, that they will be given funding, because perhaps that will give people the opportunity to purchase like cleaner vehicles and that will have an impact. You know, my concern was that it wouldn't have, you know, the actual tax itself, well, you know, charge itself wouldn't have that much impact. But I think if funding is available, as well and that, you know, encourages people to purchase cleaner vehicles, then that's the real positive, I think." (Public, G2: Modes used within region, Aged 40+ Outside GM)

"I think they should really be focusing on people, encouraging people to get on public transport and upgrading the public transport and not penalising the cab drivers and the taxi drivers." (Public, G3: Mix modes used, All with young families or children, Aged 18-40, Live in poor air quality areas, Inside GM)

Many businesses just struggled with the idea of how much it was going to cost them and their business.

> *"Bigger firms don't need the support as much. Definitely not, because they can cater for the needs and requirements. They're already compliant because most of Stagecoach vehicles are already electric and they're all brand new." (Business, Minibus / Coaches, B8, Inside GM)*

> *"I'm not impressed with the cost of it. We're all really struggling at the minute, like everybody here with the COVID. I have spoken to my MP about this and they've offered us £16,500, which is nowhere near, where are we supposed to get the rest of the money from?" (Business, Minibus / Coaches, B8, Inside GM)*

One of the companies explained investing in vehicles and the contracts they have usually require a lead in of many years.

> *As I say when you put in for school contracts these last ones are for four years and you've got to try and guess what's happening in four years' time, so it's impossible anyway. But like the other contracts I've got if they are Euro 5 on them and I'm going to get a £9 charge on them, then that's most of your profits gone out of that job anyway." (Business, Coaches / Minibuses, B8, Inside GM)*

Clean Commercial Fund

The Clean Commercial Fund is proposed to support eligible non-compliant coaches, minibuses, HGVs and vans to upgrade to a compliant vehicle.

Coaches and Minibuses

Some businesses questioned the criteria determined by the government framework for what was defined as 'compliant' and whether that would remain the same in the future.

> *"It is as it is but this vague there's going to be funds here and grants here, until you know what the criteria is, it doesn't really mean anything does it." (Business, Minibus / Coaches, B8, Inside GM)*

> *"I'm thinking that currently Euro 6 it is, what's the next step, do we go Euro 7, Euro 8? When do we get to the point where we're not constantly improving air quality and they're constantly passing costs on to smaller companies, because the major of wagon companies are quite large fleets. The majority of coach companies, there's more small operators that run four or five, six or eight vehicles, where does it stop and ultimately, we as operators have to cover those costs, it has to come from somewhere and where it comes from is our customers." (Business, Minibuses / Coaches, B2, Outside GM)*

Some specific businesses or individuals felt the Clean Commercial Fund will not go far enough to help them upgrade, especially in current circumstances.

> *"It's £5,000 towards a minibus and to get a Euro 6 even a Ford Transit you're looking at about £27,000 so £5,000 towards that is another £22,000 per vehicle times three, so it's a big debt that you're getting yourself into for the sake of earning not enough." (Business, Minibuses / Coaches, B8, Inside GM)*

Coach companies based outside the region reported they would be unlikely to invest in their fleets, especially as they would not be entitled to support. They stated costs would have to be passed to customers and therefore, they are likely to move some of the package day trips to areas other than Greater Manchester to maintain their competitiveness.

> *"Well, I think from my point of view it's penalising the people that are bringing revenue into the city. To all the businesses in the city that we bring people to, then it's penalising those people, because we're not going to do it, because I'm not going to invest in Euro 6 vehicles, not in the immediate future anyway, not at least in the immediate future, no way. Ultimately the passenger is going to pay the cost. You're penalising operators outside of Manchester whilst giving them grants while they're inside Manchester and extending the time limit for them. That's unfair on the industry as a whole. Yeah and you're devaluing everybody's fleet, whether they're in Manchester or they're not, by*

bringing this in you are devaluing their fleet." (Business, Minibuses / Coaches, Outside GM)

Businesses outside Greater Manchester felt they were being penalised by not being offered the same funding as those inside the boundary.

"They're doing the complete opposite than what is needed. They're making it more expensive to go into Manchester in an environmentally friendly vehicle, but it's Euro 4 or Euro 6, just by the sheer number of people we'd be carrying. I think the advantages to being in Greater Manchester are completely unfair to operators that are outside, you know, they're getting an extra nine months, they're getting the extra funding to do it and the nine months." (Business, Minibuses / Coaches, B2, Outside GM)

Minibus companies based outside Greater Manchester stated they would be unlikely to invest in a new vehicle, particularly as they would not be entitled to support and ultimately will pass the charge on to customers.

"But there might be the issue that if they don't want to pay, so you say to them it's £200 to go to Chester, it's £260 to go to Manchester, they're just going to pick to go somewhere different. And so, Manchester loses as well, doesn't it, because they haven't got the tourism coming in." (Business, Minibuses / Coaches, B2, Inside GM)

These companies felt upgrading their fleets in the current climate when the pipeline of work is uncertain would not be a secure investment.

"Oh, course it is, but even so, to buy a fleet of those minibuses and just do school runs and the airport as you were saying, it would still be difficult, it's not just because of the COVID situation. (Business, Minibuses / Coaches, B8, Inside GM)

HGV

Whilst some businesses were appreciative of the financial support potentially on offer, many felt it would not cover the whole cost of a vehicle and that was a problem for them.

"Regarding our line of work, I've been heavily involved in it, especially with the vehicles update, because one of our vehicles, in excess of 250 tons, so the replacement vehicle we purchased last year actually came, I think it cost just under a quarter of a million pounds to replace one vehicle. So, you sit there, and you look at it, obviously the ongoing extent is with the low emission zone come in and the reinvestment in equipment, just to keep it within this low emissions bracket, it does have quite a knock-on effect with obviously profit margins and everything else." (Business, HGV, B7, Manufacturing / HGV Transport, Inside GM)

It was also queried whether this had the possibility of affecting competition between businesses based inside and outside of the boundary.

"So, some of our competitors based outside the region will still have to pay the charge but won't get the funding support. I wonder if that means they will just concentrate on other areas? (Business, HGV, B7, Manufacturing / HGV transport, Inside GM)

"I think it makes it uncompetitive to work in Greater Manchester and if you could work somewhere else, I think you'd choose to do so. If you were setting up a new business you'd choose to do it in a different zone, I think." (Business, HGV, B7, Manufacturing / HGV Transport, Inside GM)

Those owning leisure HGV vehicles felt the cost just won't go far enough to help.

"Funding won't go far enough. Not with specialist vehicles, because to me a horsebox is a specialist vehicle, you know, it's not just a box, you know, there's a lot of things that go into making that safe to transport up to three half ton animals at the end of the day." (Public, G12: Campervan / Horseboxes)

LGV

Some felt the funding was supportive and respondents were relieved they would have the option to apply for support, rather than upgrade by themselves.

> *"I'm glad it's there. Yeah, you know, it can't not help, can it, really, it's a decent chunk of money towards a vehicle." (Business, LGV, Bus10, Van Owners, Inside GM)*

A couple of businesses were still processing the information as part of the group and felt they needed to investigate the funding a bit more before being totally convinced but felt if they were eligible, they would apply.

> *"I need to upgrade but was not aware of this before today's call. I think I need to wait and understand more before I go ahead and upgrade now. If there is support and I'm eligible then I should apply for that." (Business, LGV, B5, Night-time economy, Inside GM)*

Some questioned where the money for the funding was coming from in the first place, especially if the charges do not cover the funding.

> *"And if part of its, if the charges don't cover the funding, then where is the money for the funding coming from, is that central Government?" (Business, LGV, B9, Construction / Retail, Inside GM)*

Some businesses wondered if there would even be enough funding to support everyone who needs it.

> *"I'd apply for it, but I think I'd be annoyed if I applied for it and I was told there wasn't any left." (Business, LGV, B10, Inside GM)*

Some businesses questioned the availability and suitability of electric vans and whether they would look to purchase those in the future.

> *"I personally don't think electric vans are where they need to be yet, you know, a lot of the time we're towing heavy trailers, big heavy trailers or a good load in the back of a van and that must reduce that 70 mile range to 30. You know, we've got two vans loaded up for the morning and they're at their limit now and I'll do half as many miles to the gallon as I should do tomorrow." (Business, LGV, B10, Inside GM)*

Lastly, some businesses thought the plan to implement the CAZ has already reduced the second-hand value of vehicles they rely on to part fund their next switch. Therefore, they have a greater funding gap if they want to upgrade.

> *"I was going to say the natural progression of obviously selling the older trucks and purchasing the new ones, that's fine, like most hauliers have five or six specialist vehicles they might run them a little bit longer, seven or eight years, but the issue we've got now is because of all these clean air zones that have been planned, it's wiped out the second hand market. So, we had a truck that pre clean air zone, we were guaranteed a 45 grand buy back, by the supplier. This has all come in now and he went, I won't even buy it off you now. So, I'm now stuck with a noncompliant truck, no-one wants to buy it because these clean air zones, nobody wants them, which is a knock-on impact which a lot of people don't see." (Business, HGV, B7, Inside GM)*

> *I'm not against the proposal, but we kind of like, we talked about it and we know that the same as in London, if you want to buy a Euro 5 vehicle in London it's cheaper than up here, because people don't want them down there and we feel that if you're going to be selling a second hand vehicle, it's going to be devalued because of this charge and then obviously you've got the expense of buying a newer one as well or three. (Business, LGV, B10, Inside GM)*

> *"We are expected to support the rest of the purchase with savings or finance? Finance is far too risky right now. Would they even lend to people given what is going on?" (Business, LGV, B6, Retail, Inside GM)*

Some of these businesses felt the timescales to make these changes were unrealistic.

> *"Yes, you're getting fifteen months to be told that you're going to have to invest an awful lot of money, basically." (Business, LGV, B9, Inside GM)*

Members of the public stated they think this fund is a good idea and it will help businesses upgrade more successfully.

> *"This is a good idea as I'm sure some smaller businesses would struggle otherwise." (Public, G3: Mix of modes used, Aged 18-40, All have young families, Live in poor air quality areas, Inside GM)*

Clean Taxi Fund

The Clean Taxi Fund was proposed as a fund to support the upgrade of non-compliant hackney carriage / PHVs to cleaner compliant vehicles.

Whilst most of the drivers interviewed as part of the qualitative exercise recognised the funding was a step in the right direction, there was consensus it didn't go far enough and upgrading their vehicle was too much of a risk currently due to Covid-19. This was consistent amongst hackney and PHV drivers and operators.

Hackney

Many of the hackney drivers and operators recognised the funding was a positive step and would support many drivers. However, many thought even with the funding, it may not be possible for some drivers to take the step and upgrade.

> *"The funding is a great idea, but our situation right now is just awful. The industry is struggling and even if the funding sounds like a good idea, I doubt many people would take the risk. We are barely taking home 30% of our normal earnings and still having to find money for insurance, maintenance, licensing etc. COVID-19 means a lot of drivers won't take the risk." (Taxi, Hackney driver – own my vehicle, Salford)*

> *"Well, yeah, but if they turn round and say I've got to pay 50 grand for a cab and they only give me 5, I've still got to find 45 grand and it just doesn't stack up for anybody and the finance companies are going to stop, as I say, they've already stopped these super cheap deals, the low deposit deals and all that and they're going to turn round and look at, scrutinise your books before they do anything." (Taxi Operator, Stockport)*

Although there were many comments in support of electric taxis, there was concern from some hackney carriage respondents about the performance of electric vehicles and availability of electric vehicle infrastructure.

> *"70,000 miles he said he'd done, and his batteries are goosed, and he didn't realise how much the batteries were. It's all right for 180 miles, then you get 160 miles and as the batteries start to die and get weaker and weaker you start getting electrical problems, you're getting forty miles, fifty miles, you've got to replace them for new ones then. So that's the problem with having electric vehicles on, good for the environment, but rubbish for the job, unless Tesla with their million-mile battery come along with a decent priced vehicle." (Taxi operator, Tameside)*

Other hackney carriage owners and drivers felt funding should not be available for PHVs, they should have already been upgraded, or they should use their own money. Some felt as a business, drivers should be responsible for funding their own upgrade or already ensuring they have a compliant vehicle so the money could be put to better use in other ways.

> *"In 2022, they shouldn't be coming with a 2014 car, it's going to be eight years. For an existing licence, even so in 2015, you should be at the point where you're looking at changing it, so I suppose COVID has kind of caused an issue with it, but pre COVID my opinion wasn't, bearing in mind this was from '21, my opinion is you should have a compliant car, you should have a Euro 6 car for private hire drivers, but taxi drivers is a different thing." (Licensed Operator, Tameside)*

Some questioned finding the finance to upgrade in the first place and how it would not necessarily be possible for everyone, even with the support of the Clean Taxi Fund.

> *"Well, yeah, but if they turn round and say I've got to pay 50 grand for a cab and they only give me 5, I've still got to find 45 grand and it just doesn't stack up for anybody and the finance companies are going to stop, as I say, they've already stopped these super cheap deals, the low deposit deals and all that and they're going to turn round and look at, scrutinise your books before they do anything." (Licensed Operator, Stockport)*

Some drivers however, stated it was untenable regardless of the finer detail due to the existing finance they have; the investment they have made in the vehicle already and the fact the industry and their income is currently in dire straits as a result of Covid-19; it was considered too much of a risk in the current climate.

> *"If somebody offered me 10 grand to go and buy a new vehicle I wouldn't accept it, because you're still looking at £30,000 finance, do you know what I mean, £30-40,000 finance." (Licensed hackney driver – own my vehicle, Stockport).*

PHV

A few private hire drivers felt it was just something they had to accept and find the finance and use the funding support to upgrade.

> *Yeah, definitely and it is going to be difficult, it'll affect us all, without a shadow of a doubt, but yeah, what can we do, we've got to comply with it, we don't have the choice, do we? (Licensed private hire driver, - own my vehicle, Bury)*

Like hackney owners, PHV owners also suggested the idea of upgrading their vehicle was a daunting prospect and an unlikely step at the present moment in time.

> *"The world is so up in the air right now. Any investment is a risk at the moment and when you have a mortgage to pay and a family to support and you can't even guarantee going out and earning enough just to cover your weekly costs (petrol, insurance, fees, any servicing or maintenance) then how can they expect people to upgrade vehicles and take on part of the expense with personal savings or loans. I won't do that; I will leave the industry before taking something on like that at this time. The industry is struggling." (Licensed private hire driver – own my vehicle, Bury)*

A couple of drivers mentioned they would need achievable payment terms for any sort of upgrade investment, for either the purchase of the vehicle or the payment back for the finance to fill the gap.

> *"Or something, you know, easy for drivers to pay monthly, because we're all earning on a daily basis." (Licensed private hire driver – own my vehicle, Trafford)*

Some drivers however were adamant even with the funding, the idea of upgrading is just not an option at the moment.

> *"in one of the most deprived towns in the whole of the UK, I simply can't afford it. I cannot afford to upgrade my car. I only do about 20,000 miles a year, now you want me to upgrade my car to a newer model car and on top of that you want it to be fully electrical in a few years down the line. Where will I charge my car, in my dad's garage or somewhere? We're living on the streets in terraced houses, how are we going to charge the car with power points, there'll be fewer people queuing up to charge their cars, then. So, it's just illogical." (Licensed private hire driver – own my vehicle, Rochdale)*

> *So, from £1,000 you won't be able to buy with £1,000, you won't be able to get bodywork for £1,000, so people end up losing, leaving the trade. I don't know about Manchester or Stockport or the more posher areas, anyway, but in Rochdale a £1,000 grant, it won't even cover the bodywork for the spray, not even an engine. So, it's serious, people can't afford it." (Licensed private hire driver – own my vehicle, Rochdale)*

Try Before You Buy

Respondents were also informed of a 'Try Before You Buy' proposal, which is an initiative for Greater Manchester licensed hackney carriage drivers to have the opportunity to hire and assess the use of an electric hackney vehicle before making an investment. This is intended to address any uncertainties about costs, range issues and availability of charging points.

> *"I can see that scheme working with some drivers and companies. Gives them an opportunity to try it out." (Taxi / PHV Users, Inside GM)*

> *"I can't see many drivers opting into that. No sense. We have enough going on without taking a scheme like that on." (Licensed hackney driver – own my vehicle, Stockport).*

Some felt although the scheme might be a good idea, they also thought electric vehicles are too expensive, and upgrade is unaffordable to many hackney carriage drivers.

> *"To buy an electric vehicle you're looking at £56,000. Now, if you want to put that in perspective I owe £19,000 on my mortgage, that £19,000 will have me working, I am working now by twenty hours, so where's the decision, where do you make the decision on that? Do you saddle yourself up with £50,000? The Government, even if they offer, I think they're thinking at the moment it's £10,000, they're looking at offering £10,000, you're still looking at £46,000, do you know what I mean?" (Licensed hackney driver – own my vehicle, Stockport)*

> "*A brand-new electric cab, the bottom end is £55,000. So even if they gave you £17,500 towards one of those vehicles, you're saddling somebody with a debt of almost £30,000.*" (Licensed hackney driver – own my vehicle, Salford)

Some drivers felt the infrastructure and technology is not far enough along with the electric cab to make it cost effective in the long run. The practicalities of having an electric cab could be an issue for some drivers.

> "*I mean I'd more than look at hybrids to start off. I wouldn't go all electric, because the facilities to charge for a taxi, whether you like it or not you do twelve hour shifts and then it jumps to someone else to do another twelve hour shift, so the car's doing a twenty four hour shift every day, but it needs to be maintained, looked after and charged and at the moment there's no places to charge, not enough places to charge them.*" (Licensed hackney driver – lease my vehicle, Salford)

> "*I know a two-year-old electric car, it needs batteries already and it's costing him £1,200 and he wished he's never bought it now.*" (Licensed hackney driver – own my vehicle, Stockport)

One respondent highlighted the issue with electric vehicles for people with hearing impairments as they cannot hear the vehicles coming.

> "*Actually there are particular issues for electric vehicles for disabled people, because they don't have any noise and therefore if you don't understand that there might be deaf and hard of hearing people, children and people with learning difficulties or dementia that might not actually see the electric, you know, be aware of the electric vehicle, you need to have a much more stringent driving standards*." (Disabled hackney / PHV user)

Impact of the Proposals - Individuals

Because private cars are not included in the proposal, most individuals did not feel the impact would be great on them. However, there were concerns businesses would pass the cost of the daily charge onto customers. The impact of this was twofold;

1. **Reduced disposable income**: some felt if charges were passed onto them as customers, they would have to reduce their expenditure.
2. **Negative impact on the economy:** some were concerned their reduced expenditure would have a knock-on effect to the GM economy and although their personal reduction

in spend maybe small for example, one less trip or one less coffee - if many people were reducing their spend in this way, then the cumulative effect could be great.

> *"It will affect like daily trips. Taxis are expensive enough from Bury to town, so if it's going to cost me even more, it means that when I get to town I can spend less, because I've still only got the same budget. You know, I mean it's not a massive budget, it's not a tiny budget, but I know what I've got to spend and it just means that a shop or the cafes and restaurants or the theatres, when they're open again are not getting the same amount of money from me or from anybody else who's had to travel in on a taxi, because it's cost them more money to get to town." (Public, G12, Campervan / Horsebox)*

> *"And there's all the small businesses, isn't there, all the trades people are going to be passing on costs to the customers, so if you need a plumber to come out and fix your central heating, there's going to be a bit extra on your bill if you pick one based inside the region." (Public, G1: Aged 18-40, Bus and Taxi users within the region, Outside GM)*

> *"If costs went up that much because they were passing the charge on to me, then I would be forced to use my car more as it would be less costly" (Taxi / PHV User)*

Impact of the Proposals - Businesses

Coaches / Minibuses

Most of the coach and minibus respondents were unconvinced the GM CAP will solve the issue at hand without it being too damaging to other parts of the region and transport network. Some respondents felt it will drive up costs of using public transport, which is the opposite of what they felt should be happening.

> *"I think the whole plan isn't going to cure it at all. They need to be hitting the cars, getting people out of their cars and onto public transport or walking or not going into city centres, and the only way to do that is by charging them and making the transport into Manchester cheaper, and the cheapest way is large-scale coaches, buses, trains. But by doing this, they're doing the complete opposite. They're making it more expensive to go into Manchester in an environmentally friendly vehicle, but it's Euro 4 or Euro 6, just by the sheer number of people we'd be carrying." (Business, Minibus / Coach, B2, Outside GM)*

Many felt the consequence of proposals would be a rise in costs which will likely be passed on to the customer in some way. Respondents felt their services were used by care homes, housing associations and school groups, where budgets are tight and are least likely to be able to afford an increase in cost. It was felt these groups were looking for the cheapest trips, rather than a chosen destination and therefore would travel to destinations outside Greater Manchester if it were cheaper.

> *"People are going to have to pay more. I mean I couldn't possibly run my company now buying all these vehicles at the same price as last year. Costs have got to go up because of these vehicles, so I am obviously going to be dearer than all the rest of the guys on here, that's the way it is, so the costs have got to go up." (Business, Minibus / Coach, B8, Inside GM)*

> *"And so, you know, if we say, oh, Manchester Christmas markets £460 or you can go to Liverpool market for £400. Bye bye Manchester." (Business, Minibus / Coach, B2, Outside GM)*

Businesses felt more time was needed. Many businesses do not make financial decisions or investments overnight, and many of the decisions they do make are decided with a three, four, or five-year timescale. Coach companies mentioned the return on investment and long-term financial planning throughout their responses in the groups.

> *"The problem is you can't just put things in with a year's notice. We need a long period of notice, because it is a slow moving industry, really. I don't mean like you should say,*

right, you've got a year to do it, you know, you'd say it's five years or in ten years, you've got to be at this point, because within that ten years or five years, operators would have updated the fleet anyway." (Business, Minibus / Coach, B2, Outside GM)

Businesses based outside of Greater Manchester felt they were further disadvantaged as they would not be entitled to funding support, yet they help to support and bring people into the region and contribute to the economy.

"Well, I think from my point of view, it's penalising the people that are bringing revenue into the city. To all the businesses in the city that we bring people to, then it's penalising those people, because we're not going to do it, because I'm not going to invest in Euro 6 vehicles, not in the immediate future anyway, not at least in the immediate future, no way. Ultimately the passenger is going to pay the cost. You're penalising operators outside of Manchester whilst giving them grants while they're inside Manchester and extending the time limit for them. That's unfair on the industry as a whole. Yeah, and you're devaluing everybody's fleet, whether they're in Manchester or they're not, by bringing this in you are devaluing their fleet." (Business, Minibus / Coach, B2, Outside GM)

A handful of respondents went as far as to say these proposals will effectively put them out of business, as they will to be able to compete going forward.

"We're just going to have to close up shop, and it's something that's going to stop you doing something that you've been doing for a long period of time, and it's a shame." (Business, Coach, B8, Inside GM)

"We're the same, it'll put us out of business. Hundreds of children are going to be without transport and then your big boys like Stagecoach will charge an absolute fortune because they'll be the only ones with the vehicles. Where does this money come from? You know what I mean." (Business, Coach, B8, Inside GM)

Some businesses felt it would just divert businesses elsewhere and the proposals are not targeting all non-compliant vehicles.

"I would say that they need to look strongly at charging cars and not charging taxis. I would say that from my point of view it will be taking people away from Manchester, the Christmas markets and the school trips and the shopping trips will be going elsewhere, rather than paying this additional charge and not for one moment would it make me consider signing up to the finance on the Euro 6 coach, not for a moment." (Business, Coaches, B2, Outside GM)

Many felt their industries are currently struggling and the proposals would impact them further with additional costs, finance and investment for the future.

"I think the big issue is the industry has got no money. We've all had nine months, pretty much twelve months without earning any money. Nobody's going to have the money to invest in vehicles next year. Nobody's investing this year, so everybody's a year behind where they were. There's not going to be the money next year, because we're not going to be as busy." (Business, Minibus / Coaches, B2, Outside GM)

There were also some respondents who thought the proposals do very little to encourage people out of their cars for the future.

"I am a green operator which costs me a lot of money and a lot of work. This is just one thing that will encourage more people to use the car. So, if you've got a minibus carrying 15 children, that would be 15 more cars on the road because if that minibus isn't there. So, what's that doing to congestion." (Business, Minibus / Coaches, Inside GM)

HGVs

Some respondents stated they will wait for the final decisions and information to be finalised after the consultation and then look to apply for funding and upgrade their vehicles, rather than struggling to do it now using just their own funds.

> *"I am not doing that now, I might as well sit and wait until April. I was looking into it, I've got a new employee starting tomorrow, one of the first jobs will be to get on the phone and get some prices for two sort of transit size vans, either 2.5 - 7.5 tipper truck, between those levels, but now I'm going to sit and wait. There's no way I'm going to spend that money." (Business, LGV / HGV, B4, Agriculture / Construction, Waste Management, Inside GM)*

Some businesses with HGVs saw the advantage of upgrading, as the daily charge would be a large cost to take on and absorb, or alternatively pass on to their clients. However, investment and the normal lifespan they get out of vehicles could be a problem for upgrading.

> *"Maybe upgrading vehicles, because there's no point us upgrading if beforehand, we may as well wait to get the £5,500 contribution if we have to, because obviously these vehicles can last ten or twelve years, so we don't normally upgrade them until they need it." (Business, HGV, Depth, Waste Management, Inside GM)*

A couple of companies with more than 1 HGV stated obtaining the finance to invest in new vehicles was going to be an issue, especially now.

> *"The thing to consider also is with the current COVID situation, everyone's credit ratings will be getting downgraded anyway, because of, you know, there's a lot of hesitancy out there for people to lend, isn't there, at the moment. So, even if you know, twelve months, two years, you could have got the credit, maybe you might be downgraded 10% or something, you know, 50%, you don't know until you need it. But a lot of companies won't be in the same position now than they were twelve months ago." (Business, HGV, B7, Inside GM)*

LGVs / Vans

A small number of the business respondents felt this was a good idea and would impact in a positive way longer term.

> *"I have to agree, yeah, you are right, of course it's our responsibility to be introduced, because it's a good impact. It will bite us financially and impact on the businesses, but in the long run, you know, for the environment we should leave this planet safer for the new generation, so yes, this is our responsibility, you're right." (Business, LGV, Bus6, Retail, Inside GM)*

> *"Personally, yes, it's an initiative in the right direction and its aims and objectives and obviously it will be oriented and of course, yeah, once it's implemented in good vehicles and on the roads, so you have a nice, a good consumption, a good environment. Yes, it's the right step in the right direction, yeah." (Business, LGV, B6: Retail, Inside GM)*

A couple of van owners, however, stated this is an unforeseen expense for them and now they are going to have to upgrade or pay the charge and they can't afford to absorb the cost of the charges.

> *"I only purchased a van recently but it won't be compliant. So I'm going to have to find a newer one instead. I can't afford to pay the charge each time." (Business, LGV, B10, Mixed Businesses, Inside GM)*

Hackney / PHV

A few of the drivers stated the changes in working cultures mean the industry as a whole is struggling and may not recover.

> "*There is no business trade now. Everyone is working from home. All the big offices, no one there. All been done online so there is no business trade, not like there used to be.*" (Licensed private hire driver – own my vehicle, Tameside)

Many of the drivers and operators felt the timetable for the proposals was too short and was forcing something that could instead be done through natural transition over a longer period.

> *"Natural transition - let everybody get back on their feet before you try and hammer them again, because if you're going to hammer people, they're just not going to use*

> *that service. They're going to say, no, I'm not doing that school contract anymore, they're going to hand them back into the councils and then on the first day of September in 2022, whatever it is and the council's come begging, please, please help me out. Why force it? (Licensed operator – own and lease vehicles, Stockport)*

> *"That's our concern, not the Clean Air Act in itself, but the timeframe with which things are trying to be done by, which with particularly with this COVID 19, you know, pandemic, which looks like now it's going to be at least a year is just thrown, you know, drove a cart and horse through all the plans regarding the other vehicles and everything else, what is financially viable and practical. (Licensed operator, Salford)*

> *"So they can't go changing things, it's going to need a long time after this has finished, it's going to be next year before we start getting back to a normality, I reckon, at least April, May, like if they've brought in any new standards for the year after, it's just a continuous loss of money for all the drivers." (Licensed private hire driver – own my vehicle, Tameside)*

Some drivers and operators felt a lot of money had already been invested in their vehicles and they will not receive the monetary worth of their existing vehicle if they upgrade earlier than when they had planned to.

> *"Yeah, yeah, but you know, like what you've got to remember, these clean air things, you can't just bring it in like that, clean air, it has to be done from a date, doesn't it? You know, like you let the vehicles work themselves out over time. A lot of these black cabs, they're invested to do that and then carry on." (Licensed hackney driver – own my vehicle, Salford)*

Some of the more elderly drivers who have invested many years in the industry felt they are too late in their careers to be considering a significant investment to upgrade their vehicle or take on daily charges. One respondent, who is currently in his late 60s, said the implementation of these proposals will force him into retirement.

> *"Yes, I've got a rough idea of what they're proposing, what they want to do, yeah. They basically want people to have new vehicles and clean the air up and tidy up the drivers to make them respectable as well as the vehicles. It will make me retire." (Hackney owner driver, Trafford)*

Some of the older drivers we spoke to also felt that, whilst other drivers are leaving the industry and finding other employment during Covid-19, they often found themselves to be in a position where age puts them at a disadvantage.

> *"I've been doing this job for thirty years now, which is the only job I know, and I can't apply for another job, because I've got no qualifications. I'd be getting as a driver or an Uber driver or Uber Eats, you know, working in that kind of industry, where I've got no experience anyway, but all it is, it's just driving and just delivering. So, that's the only qualifications that I have that I can really get into and plus my age now, I'm 54 years old, you know, especially when I've been doing taxis since I was twenty years old, you know, it's going to be hard for me, especially at my age now." (Licensed private hire driver – own my vehicle, Rochdale).*

Impact of Covid-19

Throughout the focus groups with individuals and businesses, many references were made to Covid-19 and the impact it is having on lives and livelihoods. Therefore, it was important to understand how Covid-19 is impacting on both types of respondents.

Effect of Covid-19 on Individuals

Most respondents reported their travel behaviour and others had changed during Covid-19 and, therefore, had most likely had an effect on air pollution. In many of the groups, respondents debated how travel choices had changed; people were working from home more due to restrictions and the current government advice not to use public transport where possible. In some cases, respondents felt this was "pushing people into their cars more" if they need to travel at all.

Those respondents classed as key workers under government guidance reported their travel behaviour had not changed during the pandemic, but they have noticed differences for others around them.

> *"Yeah, so I'm a key worker as well, I'm a support worker, so I've carried on working and I rely on my car for work, so I've not really seen much of a difference transport wise, apart from in the first lockdown, it was much easier to get around Rochdale where I was working. You know, the second lockdown, it doesn't seem as though very many people are locked down, you know." (Public, G12: Campervan / Horseboxes)*

Many respondents felt the "new normal" is unlikely to change any time soon and the new culture of working from home is likely to become more prominent in the future. Respondents felt this new way of working is favourable and a more hybrid approach in the future may be the preferable amongst workers.

> *"I've been working at home since March and I think it's going to continue for some time really, and I think it's changed, you know, certainly my like office environment. I think everybody's thinking it's never going to back, because I only worked three days anyway, you know, but I don't think I'll be going back to working three days in the office at all, really. Perhaps I might be just doing one day, one day a week or something in the office, but the rest of the time, I think it's going to continue to be at home for the foreseeable future." (Public, G2: Aged 40+, Bus / Taxi users within region, Outside GM)*

Some respondents highlighted the indirect impacts of people working from home more and not going into city centres or key shopping hubs and, due to restrictions, this has impacted the delivery and courier industry.

> *"It's impacted me because I don't use transport as much as before, but the thing now is, it's had those indirect impacts, because you're not using transportation as much anymore, but you're sitting at home and you're ordering so much, and the trucks and the buses are delivering the others, so indirectly, I'm still contributing to be honest. I'm ordering much more than I did before." (Public, G8, Mix of modes used, Live in poor air quality areas, Aged 18-34, Inside GM)*

Effect of Covid-19 on Businesses

After the initial first weeks of the first lockdown in March 2021, a proportion of businesses respondents felt they adjusted to the restrictions and have managed to trade at the same level or at a higher level than since before Covid-19. They stated this is due to some of their supply chains being able to still use their services during the pandemic.

> *"I mean immediately when the outbreak started, we basically shut down, but only for two weeks until our customer base got a feel for what was going on and realised that construction could keep going, and since then, we've never looked back. We've probably had one of the best years ever, because car parks are closed or some are and some country parks have been closed, we've been able to get into those parks, car parks etc, to install, whereas normally, they're full of people and cars. So, it's worked better for us." (Business, HGV / LGV, B1: Agriculture, Construction, Outside GM)*

> *"COVID-19 has been very up and down. I do a lot of, basically I do a lot of NHS maintenance, schoolwork and local authorities, so obviously, I'm committed to regional work which is primary healthcare to Manchester. We had a very quiet two or three months, but there was only me working, really, because I employ a lot of day work subcontract lads, who I employ maybe nine or ten months of the year and kept those*

ticking over, but my own employees, because we couldn't go into the schools and we couldn't go in the NHS, it was a bit quiet for three months, but as it stands now, I've never been as busy." (Business, LGV / HGV, B4, Agriculture / Construction, Waste Management, Inside GM)

Some businesses explained they had needed to adapt and to change their methods and processes in order to survive the pandemic, but they felt afterwards they may have benefited from Covid-19.

"We moved onto online. We set up a new website. We sold an awful lot online. We actually sold more online than we would have sold usually in the shop in the first three months, so it worked. It worked well for us. It does have some consequences though – increase in postage costs and courier costs for example." (Business, B3: Retail, Outside GM)

"I was going to say we do a lot of events, so that sector has just completely been wiped out. The bank asked me to do like a look into what it financially is to us, and it's about a quarter of a million in revenue, which we lost over night, and there's no sight of that coming back, but we have diversified and gone out and done different work now, to the point where we've put another two trucks on the road over the last two months, that's obviously down to the workload. Like I say, similar to the other guys, when the first lockdown came it was like whoa, shock, my artics (articulated lorries) got parked up overnight, because they're working in the event stuff, but then things carry on, generators are still needed, that's the majority of our work." (Business, HGV, B7, Manufacturing / HGV transport, Inside GM)

However, some businesses felt Covid-19 has had a significantly detrimental impact on their businesses, and they are struggling to survive and remain financially viable due to the lack of business in 2020. They also feel there is much uncertainty for 2021 and beyond for their businesses.

"We are event florists, and we haven't been doing any events this year. All events postponed or cancelled, and we have had to refund money, and it has been damaging to the business. You know, we are coming to the crunch point now, yeah, and as we move into January and February, which is a traditionally quiet time of year in our industry, that is where it is going to be really difficult."(Business, LGV, B3: Retail, Outside GM)

"COVID-19 has affected all our businesses with the restrictions, and many businesses in our industry will not re-open, I don't think. Reduced turnover, and the changes in the working world because of COVID-19 and businesses we supply to not operating etc. It is a real struggle and will be for a while yet. I'm not sure if we will survive it." (Business, LGV, B5, Night-time Economy, Inside GM)

Some businesses reported due to Covid-19, they have delayed the purchase of new vehicles, as in the current climate, they feel there is too much of a risk and / or they don't have the money they usually do to buy new vehicles.

"By now, I would have replaced a couple of my vans during the last few months, but I'm waiting to see what happens as I'm not using them at the moment anyways as there are no events for us to go to. It is too risky, and I don't have the cash flow for it." (Business, B3: Retail, Outside GM)

One of the businesses reported taking the opportunity of a quieter period to trial an electric van to see how it would fit in with their business and their needs. Whilst they found it a useful experience, it has shown that, for their needs, it is not suitable yet at the level of technology it is at.

"I actually had an electric van on loan to the business to see whether we liked it or not. It was nice, and I think a lovely van to drive, but it only takes 80 miles before it needs charging again. Most of my general trips are at least 100 miles plus, so yes, it was nice to trial but impractical, especially with no charging points around. It is supposed to self-charge as it was driving, but it only gave you another 15 miles or so. It was a shame, but it is not right yet for us." (Business, B3: Retail, Outside GM)

Most businesses, even those that have managed to remain busy during this period, are cautious about how they will be able to adapt or respond to the proposals. Some businesses are worried the current climate makes it untenable, even with some level of support from the 10 Local Authorities, to contemplate being able to upgrade to newer vehicles and, therefore, the prospect of a daily charge is a worry for them.

Even though some businesses stated they are doing well during this period in terms of work available to them, they also highlighted they are feeling the consequences elsewhere. As already mentioned, because one business had taken their business online to a larger extent, their postage and courier costs have increased due to the restrictions in place and people not being able to come to the store.

> *"We have had to invest in more packing and boxes and trips to the post office, if it was small enough. If not, arranging for couriers to come in and pick it up and find the best price on couriers, so that has been a cost that we have seen increase during this time." (Business, B3: Retail, Outside GM)*

A construction firm noted that due to social distancing rules, when they would usually send five workmen in one van to a job, they now must "buddy up" the staff into pairs and send three vans to a single job with one or two people in each, thus increasing the costs to complete one job. They also acknowledged the impact sending three vans instead of one has on their carbon footprint.

> *"And most of my vans are five-seaters, so before this, I was sending like five lads to a job in one van, but now I'm sending three vans to one job, with five men. Obviously, it's costing more with everything, because I could send five men to one job in one van, but now I've got five men to a job in three vans. We basically would sign a contract to say one of my contracts has got three hundred hours on it, it might last six years, and when you sign it, it says duration of contract, so I can't recoup those costs." (Business, LGV / HGV, B4, Agriculture / Construction, Waste Management, Inside GM)*

Some of the businesses stated they are trying to "make it through Covid-19" and, therefore they are not aware of the proposals because they are focused on other things. Now they feel they cannot think about the longer term and how they will respond to the proposals; as one said, "they may not have a business by then".

> *"My main worry is next year, you know, and the fact that with more people working from home, parking and car parks aren't going to be utilised as much as they were being used, and how that might affect my business" (Business, HGV / LGV, B1: Agriculture, Construction, Outside GM)*

> *"I think the big issue is the industry has got no money. We've all had nine months, pretty much twelve months without earning any money. Nobody's going to have the money to invest in vehicles next year. Nobody's investing this year, so everybody's a year behind where they were. There's not going to be the money next year, because we're not going to be as busy." (Business, Minibus / Coach, B2, Outside GM)*

Others were worried the knock-on effects of Covid-19 will be seen in their financial credit ratings for any future borrowing they consider.

> *"The thing to consider also is with the current COVID situation, everyone's credit ratings will be getting downgraded anyway, because of, you know, there's a lot of hesitancy out there for people to lend, isn't there, at the moment. So, even if you know, twelve months, two years, you could have got the credit, maybe you might be downgraded 10% or something, you know, 50%, you don't know until you need it. But a lot of companies won't be in the same position now than they were twelve months ago." (Business, HGV, B7, Manufacturing / HGV transport, Inside GM)*

Effect of Covid-19 on Air Quality

Many respondents thought restrictions during Covid-19 had affected air pollution in a positive way and referenced examples of why they thought this, highlighting the lack of air traffic and

less vehicles on the road temporarily, as some of the main reasons as to why they felt it had been good for air quality.

> *"I did see a lot of things about the fact that, you know, people weren't really doing very much, and they weren't going out and, obviously, because of that, that meant that like … I think I saw like a picture of Venice, that the water was clear for the first time ever or something." (Public, G10, Female only group, Aged 18-34, Bus / Taxi users, Low income areas, Inside GM)*

> *"Well, I mean I go back to the first lockdown as well, I had the good opportunity of going to a top floor, high hotel in Manchester and I could see the difference between the quality of the air, if you know what I mean, you can't, you can sometimes see a haze over the city, whether that was in the morning or at night, you could certainly see it and during the lockdown even after ten days of the first lockdown, I could certainly see a difference in the air quality. I don't know what it was like breathing it in, I mean, but it certainly looked cleaner, it certainly looked cleaner and it was basically due to nothing on the roads, absolutely nothing on the roads and nobody in Manchester, really, but I think that was probably the big help, that nobody was travelling into town and nobody was doing anything, so you could see the marked difference, definitely." (Business, Depth, Plumber, Inside GM)*

Conclusions

Overall, members of the public were quite positive about improving air quality across the region. However, whilst businesses acknowledged the importance of air quality, it was of less importance to businesses than members of the public.

Both members of the public and business respondents questioned whether the criteria of which vehicles had been defined as compliant by Government and the strategy implemented would succeed in reducing poor air quality in the region. There was a lot of discussion around why private cars had been excluded from the proposals and how successful the CAZ would be without them.

Many respondents suggested members of the public will be negatively affected as the investment costs, or the daily charges will be passed on to the customer. Businesses said they would need to find a way to cover the costs and suggested this would result in an increase in prices / fares. Some businesses suggested it may become part of their job by job costings i.e. if a customer was paying for a service or delivery in GM there would be an automatic surcharge to cover the daily charge the driver / business would receive for entering the CAZ.

Almost all respondents felt support was needed for businesses to be able to afford to upgrade their vehicles in time. However, some businesses did not believe the proposed funding goes far enough as they would need to invest in their vehicles in order to become compliant. Many also felt there are a lot of businesses in the region and the proposed funding pot would not be able to cover everyone eligible for support. Financially, they felt new vehicles is a big investment for a lot of companies and now this is seen as a risk due to economic uncertainty.

One of the key areas of discussion was the lead in time to upgrading vehicles prior to the CAZ being implemented. Many businesses reported they buy their vehicles and plan the investment and payment over 5+ years. Some businesses had only recently bought vehicles in the past 12-18 months that would not be compliant. Some businesses had not been aware of the proposals prior to the focus groups and felt they need more notice to be able respond.

Across all respondents, many raised concerns about the timings, considering the current Covid-19 pandemic. Many respondents stated many businesses are struggling to stay afloat, without the extra pressure of having to find the investment to upgrade to newer vehicles or pay the daily charge once the plan is put into place. A handful of businesses and taxi / PHV drivers suggested the proposals could be the final straw for them in what has been a difficult 12 months and it may cause them to close their business and / or retire.

Appendix E Organisations, Elected representatives and Businesses who responded

Organisations:

The list of organisations that responded to the consultation are shown below. An additional 11 organisations responded, but did not provide their name and one wrote on behalf of a school, but did not state they were authorised to do so.

2nd Cheadle Scout Group

Altrincham and Bowdon civic society

Asthma UK and British Lung Foundation Partnership

Both St Barnabas Church and Waterhead Church, Oldham

British Horse Society Regional Bridleways Officer for NW

Burnley Bridleways Association

BVRLA

Chamber of Commerce

Cheshire East Council

Chorlton Health Centre

Client Earth

Communication Workers Union

Community Transport Association

Corrie Primary and Nursery School

CPT UK

CSPHA

East Durham Community Transport Ltd

Farnworth Baptist Church

Federation of British Historic Vehicle Clubs Ltd.

Fightback4justice

Friends of Carrington Moss

Friends of the Earth England, Wales and Northern Ireland

Friends of the Trans Pennine Trail

Friends of Victoria Park, Stretford

Federation of Small Businesses

Greater Manchester Shared Services

Green Groups

High Peak Borough Council

Kickstart Social Enterprise

Lancashire Mounted Games Association

Lancashire County Council

Levenshulme Clean Air Community Group

Liverpool City Region Combined Authority

Manchester Arts Sustainability Team

Manchester City of Trees

Manchester Friends of the Earth

Manchester University NHS Trust

MESS (Marple Energy Saving Strategy)

Military Vehicle Trust

Museum of Transport, Greater Manchester

National Association of Road Transport Museums

National Physical Laboratory

National Private Hire and Taxi Association (NPHTA)

NFU

Northern Liaison Group (British Riding Clubs)

Our Sale West Big Local

p.h.d.a limited bury

Pole Moor Riding Club

Road Haulage Association

Rochdale and Bury Bridleways Association

St Helens Council

Steady State Manchester

Stockport Youth Council

Tameside Owners & Drivers Association

Taxi Trade Organisation / Committee / Representatives with over 100 members

The British Horse Society

The Builders Merchants' Federation Ltd (BMF)

The Christie NHS Foundation Trust

The Hackney Drivers Association Ltd

The Northern Care Alliance NHS Group

The Old Courts Wigan

The River Manchester

The University of Manchester

Trans Pennine Trail Partnership

Transport for Sick Children

Unite the Union (Manchester Hackney Carriage)

University of Manchester PGCE Secondary Programme

Walk Ride Heatons

Wesley Community Furniture

Whalley Range Climate Action Group

Withington Civic Society

Councillors and Elected Officials

The list of Councillors and Elected Officials who responded to the consultation and the areas they represent are shown below. Five responses were provided without a name or area.

Name	Area represented
John Mullen	Barton
Adele Warren	Breightmet
Martin Hayes	Elton Ward Bury MBC
Charlotte Morris	Elton, Bury
Bob Allen	Heaton & Lostock, Bolton
John Taylor	Heatons North, Stockport
Marie Brady	Horwich North East
Arnie Saunders	Kersal Salford City Council
Dane Anderton	Leigh West
Peter N Roberts	Limestone Peak
Janet Emsley	Littleborough Lakeside, Rochdale
Mandie Shilton Godwin	Manchester
Charlie Stewart	Manor, Stockport
Stephen Homer	Mossley, Tameside
Christopher Evans	North west union officer
A R Khayal	Oldham
Chris Gloster	Oldham
Councillor Flores	Oldham
Jim McMahon OBE MP	Oldham West and Royton
Jon-Connor Lyons	Piccadilly
Haf Barlow (on behalf of the council)	Poynton Council
Kieran Heakin	Rochdale Healey Ward
Steve Hewitt	Saddleworth west and lees
Councillor Driver	Stockport
Matt Wynne	Stockport
Name not provided	Stockport
Stephen Adshead	Stretford, Trafford
Jim Cammell	Swinton South
Brenda Warrington	Tameside
Philip Fitzpatrick	Tameside

Janet Cooper	Tameside- Longdendale
Rt. Hon. Esther McVey	Tatton
Ben Hartley	Trafford
Mike Cordingley	Trafford
Councillor Watters	Westhoughton South
Joanne Marshall	Wigan
Robin Garrido	Worsley Salford

Business and private hire operators

A list of large businesses and private hire operators who responded to the consultation are shown below. A full list of the businesses and private hire operators who responded to the consultation, and confirmed they were authorised to respond as such, can be found here: https://cleanairgm.com/technical-documents/

A W & D Hammond Ltd
Acklams Coaches Limited
Arriva North West & Wales
Birchall Foodservcie
Capita / Network Rail
CEMEX
Crystal vehicle rental services
David Bratt & Sons (Haulage)Ltd
Double Time Distribution Ltd.
Eddie Stobart Logistics Ltd
Enterprise Holdings
Frank O'gara and Sons
Frederic Robinson Ltd
G C Birchall Ltd
Go North West Limited
Greystone Financial Services Ltd
H.G. Stephenson Ltd
High Peak Buses
Holmeswood Coaches Ltd
Home Instead Senior Care (bury)
John Macadam and Son
Kenny Waste Management
Law Distribution Ltd
Lets Travel
London EV Company
M&I Materials Ltd
Manchester Airports Group
MediaCom North Group
Megabus (Stagecoach)
Music Magpie
NG Transport ltd
OneBus
P F Jones
Polyflor Ltd
Post Office
RAC Motoring Services
Roy Braidwood & Sons Transport Ltd
Royal Mail
Sebden Steel Service Centres Ltd
SPizarnia UK Ltd
Stagecoach Manchester
Tamar Coaches & Tours
Tarmac
Transdev
Transport Service Solutions
Uber
UPS UK
V A Whitley & Co. Ltd
Vic Young (South Shields) Ltd
W Harrison & Sons (Carriers) Ltd
W. Howard Limited
Wallwork Heat Treatment Ltd
Warrington's Own Buses
Zeneth

Appendix F Coding of comments

Each question was coded by themes which emerged from the comments received. The following tables were used for analysis.

Where responses were provided in one question that had relevant themes for another question these codes were moved to the relevant question.

The proposed Clean Air Zone boundary would follow the existing administrative boundary of Greater Manchester as closely as possible. Do you have any comments on this?

	General Public	Business	Representatives	Own an impacted vehicle	No impacted vehicle owned
Zone / boundary / areas covered is fair / appropriate / reasonable	323	28	19	24	342
Concerns about redistributing traffic/congestion/air quality problems to surrounding areas (outside boundary)	79	8	7	31	57
Will negatively impact people living on the GM boundary	91	23	5	85	30
Should be different boundaries for different vehicles	21	1	0	16	6
Will negatively impact people travelling to and from Manchester Airport	3	2	1	1	4
City centre should be a ULEZ	483	2	1	2	1
Queries about the proposals / information not clear - general comments	46	9	0	17	38
Queries about the proposals / information not clear - boundary	37	7	0	11	33
Should make the zone larger (UK wide / national scale)	29	8	3	7	23
Should include specific roads / areas	25	1	3	1	25
Should include the Motorway/Strategic Road Network	56	5	4	9	50
Should exclude specific roads / areas	23	4	1	12	15
Boundary should focus on city centre only / M60 boundary	122	51	3	99	74
Zone / areas covered is too big	171	90	7	148	117
Zone / areas covered should just be those with poor air quality/city centre and towns / high-risk areas	67	26	9	35	59
Make zone wider NW / general	46	7	0	9	33
Other	36	9	4	8	38
Base	**1388**	**205**	**49**	**355**	**776**

The Clean Air Zone would operate 24 hours a day, seven days a week, signage would be used to clearly identify the Clean Air Zone, and the daily charges would apply from midnight to midnight. Do you have any comments on these proposals?

	General Public	Business	Representatives	Own an impacted vehicle	No impacted vehicle owned
Oppose the proposed operation times	125	31	2	63	95
Support the proposed operation times	856	16	21	19	387
Concerns about signage / need to provide clear / easily visible signs	93	13	1	17	89
Concerns / doubts about the implementation/enforcement of the clean air zone	62	10	2	13	56
Should only be charged once within a 24-hour period	31	7	0	15	23
Suggest the time between 24-hour periods should be different / midnight should not be the end / start between 24-hour period	8	1	1	2	6
Unfair to those who do not spend long travelling within the boundary / travel a short distance	2	1	0	1	2
Do not charge for evening / night journeys / only charge in daytime	105	22	5	49	82
Do not charge for weekend travel	44	13	2	39	19
Change the hours of operation to peak times / hours only	66	27	5	45	50
Queries - general	7	5	0	7	5
Other	35	4	5	13	31
Base	**1332**	**129**	**39**	**237**	**766**

Do you have any comments on the proposed charges?

	General Public	Business	Representatives	Own an impacted vehicle	No impacted vehicle owned
Oppose the proposed charges / disagree with the charges (e.g. seem unjustified, counterintuitive, won't make a difference	414	156	7	257	316
Support the proposed charges / they are good/fair	593	4	2	8	105
Charges should be the same amount for all affected vehicle types	14	2	0	4	12
Differences between charge amounts is unfair	10	5	2	5	12
Charges should be based on mileage	21	4	2	13	12
Charge should be higher for travelling during peak times	41	10	0	12	39
Charge only those who travel in / around city centre most frequently	12	5	1	10	7
Charges should be dependent on the size of the vehicle	12	2	0	4	10
Charges should be dependent on the emissions of the vehicle	61	8	2	12	58
Suggest that the charges should be paid for weekly / monthly / annual periods rather than daily	17	3	1	8	13
Queries about the proposals / information not clear - general comments	44	6	3	22	31
Queries about the proposals / information not clear - charges	85	18	4	31	73
Charges are too high / should be lower (general)	258	112	2	190	182
Charges are too high / should be lower for - buses	75	17	3	19	73
Charges are too high / should be lower for - coaches	28	9	0	10	26
Charges are too high / should be lower for - HGVs	14	14	3	13	14
Charges are too high / should be lower for - vans / LGVs	21	18	1	24	14
Charges are too high / should be lower for - minibuses	11	2	0	3	10
Charges are too high / should be lower for - hackney carriages	26	14	1	12	27

Do you have any comments on the proposed charges? (cont.)

	General Public	Business	Representatives	Own an impacted vehicle	No impacted vehicle owned
Charges are too high / should be lower for - private hire vehicles	22	18	0	14	25
Charges are too high / should be lower for - private leisure vehicles	57	2	3	54	4
Charges are too low / should be higher (general)	84	7	3	7	86
Charges are too low / should be higher for - buses	13	2	1	4	12
Charges are too low / should be higher for - HGVs	27	1	1	1	28
Charges are too low / should be higher for - vans / LGVs	14	1	1	0	16
Charges are too low / should be higher for - Hackney carriages	43	2	0	3	42
Charges are too low / should be higher for - private hire vehicles	42	1	1	1	43
Charges are too low / should be higher for other vehicle types	21	1	0	2	20
Other	75	13	8	22	65
Base	**1722**	**344**	**36**	**568**	**1024**

To what extent do you agree or disagree with the permanent local exemptions? Why do you say this?

	General Public	Business	Representatives	Own an impacted vehicle	No impacted vehicle owned
Support / agree with the permanent local exemptions / they are fair	951	169	34	296	852
Permanent local exemptions are not needed / should have upgraded already	23	1	0	6	17
Disagree with the permanent exemptions (general)	264	66	5	99	235
Proposed permanent exemptions are unfair / more vehicles should be temporarily exempt (general)	28	6	3	17	17
Concern about enforcement of permanent exemptions / ensuring they are not abused	108	4	4	12	102
Exemptions should be temporary	40	4	0	4	40
Permanent exemptions should be regularly reviewed	13	0	2	1	14
Should be permanently exempt - buses	84	10	1	21	74
Should be permanently exempt - taxis	51	51	9	57	53
Should be permanently exempt - vehicles used by disabled / vulnerable users	148	36	6	57	132
Should be permanently exempt - specialist vehicles (e.g. adapted vehicles that would be difficult / impractical to upgrade	18	17	8	22	9
Should be permanently exempt - private leisure vehicles (e.g. horsebox, motorhome)	234	17	13	202	40
Should be permanently exempt - business vehicles	34	17	5	31	24
Should be permanently exempt - businesses with multiple vehicles should have at least one permanently exempt	1	3	0	4	0
GM residents should be permanently exempt	34	8	1	26	16

To what extent do you agree or disagree with the permanent local exemptions? Why do you say this? (cont.)

	General Public	Business	Representatives	Own an impacted vehicle	No impacted vehicle owned
Should NOT be permanently exempt - disabled passenger vehicles	104	17	2	26	96
Should NOT be permanently exempt - emergency service vehicles	3	0	0	2	1
Should NOT be permanently exempt - specialist vehicles (e.g. adapted vehicles)	29	3	1	6	27
Should NOT be permanently exempt - driving within the zone due to a road diversion	40	2	3	3	42
Motorway diversions are hard to manage	30	1	1	3	29
Major roads should be permanently exempt	2	1	0	3	0
Prolonged / long-term diversions should not be permanently exempt / should be temporary	5	0	0	0	5
SHOULD LGV and HGV	16	8	2	17	9
SHOULD NOT Historic and military	23	1	1	4	21
SHOULD NOT Community minibuses and non-road going vehicles	8	1	0	0	9
Permanent Exempt coach and minibus	12	2	1	4	10
Queries - general	129	25	5	53	102
Other	45	7	6	15	35
Base	**1749**	**343**	**74**	**648**	**1479**

To what extent do you agree or disagree with the temporary local exemptions? Why do you say this?

	General Public	Business	Representatives	Own an impacted vehicle	No impacted vehicle owned
Support / agree with the temporary local exemptions / they are fair	774	155	28	243	710
Enough time to upgrade to compliant vehicles	67	5	2	12	62
Two years is not enough for the temporary exemption / need longer	226	92	10	151	175
Temporary local exemptions are not needed / should have upgraded already	41	4	1	6	40
Disagree with the temporary exemptions (general)	122	18	7	31	116
Temporary local exemptions will not help / will not be able to afford to upgrade even if given more time	20	12	1	23	10
Proposed temporary exemptions are unfair / more vehicles should be temporarily exempt (general)	11	2	1	8	5
Should be temporary for vehicles until they are due for an upgrade	57	32	4	36	53
Concern about enforcement / ensuring they are not abused	23	0	1	4	20
Temporary exemptions should be regularly reviewed	3	0	0	0	3
Vehicles should be temporarily exempt until Covid-19 has passed	4	4	0	5	3
Temporary exemptions should be shorter	169	8	4	3	178
Incentivise behaviour change / need more incentives for upgrades	221	6	3	11	43
Should NOT be temporarily exempt - vans / LGVs	14	0	2	0	15
Should be temporarily exempt - private leisure vehicles (e.g. horsebox)	11	1	1	7	6
Should be temporarily exempt - HGVs	3	5	0	5	3
Bus coach and minibus	1	3	0	1	2
Should not be temporarily exempt - taxi	18	3	1	5	17
Should be exempt - taxis	11	5	4	5	15
Should be exempt - specialist all	15	3	1	5	12
Queries - general	32	3	0	13	22
Other	11	6	0	5	12
Base	**1537**	**304**	**55**	**468**	**1240**

To what extent do you agree or disagree with the permanent local discounts? Why do you say this?

	General Public	Business	Representatives	Own an impacted vehicle	No impacted vehicle owned
Support / agree with the permanent local discounts / they are fair / helpful	333	60	18	122	286
They are not needed / should have upgraded already / should have to pay	377	52	7	61	375
Leisure vehicles over 3.5 tonnes should not be offered discounts	39	4	2	8	37
Private hire vehicles should not be offered discounts	86	13	3	27	75
Discounts should depend on vehicle age / pollution it causes	6	0	0	2	4
Concerns that the discounts will result in people not upgrading	62	2	2	2	64
Concerns about discounts being abused / how these will be enforced	124	11	4	14	123
Queries about the proposals / information not clear - general comments	21	2	0	8	15
Queries about the proposals / information not clear - discounts	44	6	2	15	37
Discounts should be higher (general)	12	1	0	7	6
Discounts should be higher for - leisure vehicles over 3.5 tonnes	4	1	2	3	2
Discounts should be higher for - private hire vehicles	2	1	1	2	2
Discounts should be lower (general)	2	0	0	0	2
Discounts should be lower for - leisure vehicles over 3.5 tonnes	2	0	0	1	1
Discounts should be lower for - private hire vehicles	1	1	0	0	2
Discounts should be higher due to / until through the Covid-19 pandemic	1	0	0	0	1
Discounts should be offered for - more vehicles / affected people (general)	14	3	0	8	8
Discounts should be offered for - Hackney carriages	6	20	3	17	12
Discounts should be offered for - leisure vehicles under 3.5 tonnes	27	1	0	21	6
Discounts should be offered for - business vehicles	7	1	0	4	4
Discounts should be offered for - those who are located outside of Greater Manchester but operate within the region	29	5	3	19	12
Bus coach and minibus	7	1	1	3	6
Other	27	1	2	3	26
Base	**1115**	**180**	**42**	**320**	**1005**

Do you have any comments on the proposed Clean Bus Fund?

	General Public	Business	Representatives	Own an impacted vehicle	No impacted vehicle owned
Funding should available to all vehicle types / fair to all (general comments)	107	49	4	73	87
Support the proposed funding / funding is important / needed to be able to conform/upgrade	609	54	18	72	431
Concerns / queries about where funding is coming from for this/transparency over funds	32	5	0	5	32
Funding should be provided as a repayable loan / not given as a grant	16	0	0	2	14
Don't agree with fund because don't agree with charges	1	0	0	0	1
Queries about the proposals / information not clear - funding amount/provision/conditions	37	16	3	20	36
Funding amount is too high / too much funding	16	4	4	3	21
Funding should not be available / not needed – should have already upgraded by now / use own money	228	37	9	61	213
Funding does not consider insurance, maintenance, other fees etc	1	0	0	0	1
Funding should only be for sole traders / smaller companies	21	11	3	14	21
Funding should only be provided to upgrade to hybrid / electric vehicles	64	11	2	9	66
Concerns about performance of electric buses	4	0	0	0	4
Concerns about availability of electric charging infrastructure / need more charging points	6	1	0	2	5
Other	70	15	3	17	71
All bus companies / operators that operate / travel in Greater Manchester and will be affected should be eligible	42	32	2	36	37
Should be given more funding	58	40	3	41	58
Payment of funds	12	2	2	2	14
Queries other	57	16	1	28	44
Base	**1205**	**219**	**47**	**308**	**979**

Do you have any comments about the proposed management of the funds?

	General Public	Business	Representatives	Own an impacted vehicle	No impacted vehicle owned
Support the proposed management of funding / eligibility criteria	50	17	4	15	56
Concerns about the funding being mis-managed / needs to be a transparent process	96	22	5	33	89
Queries about the proposals / information not clear - general comments	23	11	0	13	21
Funds should be prioritised for older vehicles / most polluting / where change will have greatest impact	264	39	14	46	270
Funds should be prioritised for those who upgrade to electric / hybrid	10	2	1	1	12
Funds should be prioritised for sole traders/small businesses / small organisations	37	19	2	21	37
Funds should be prioritised for voluntary / community organisations / charities / services	11	0	2	1	12
Prioritisation of funding should depend on impact of proposals on the business / organisation	10	3	2	2	12
Concerns about larger companies accounting for / receiving the majority of the funds available	28	11	1	13	26
Funds should be prioritised for those who have already recently upgraded their vehicle/s / should be reimbursed	9	1	0	1	9
Funds should be prioritised for buses / vehicles carrying most passengers	14	1	0	2	13
Needs to be well-advertised / promoted to ensure all those affected are aware and know how to apply for funding	4	4	0	5	3
Concerns about people claiming for funding when not needed / trying to commit fraud / abuse the scheme	65	11	1	17	60
Funding should go to those who need it most / should be means tested	40	6	4	12	38
Concerns that they may not be able to apply immediately / missing the opportunity	2	3	0	3	1
Should be first-come-first serve	2	1	1	1	3
Older vehicles are not necessarily the most polluting / should not focus on oldest vehicles	37	6	2	6	39
Other	54	15	1	22	48
Base	**577**	**124**	**30**	**162**	**565**

Do you have any comments on the proposed Clean Commercial Vehicle Fund?

	General Public	Business	Representatives	Own an impacted vehicle	No impacted vehicle owned
Funding should available to all vehicle types / fair to all (general comments)	60	23	3	39	47
Support the proposed funding / funding is important/needed to be able to conform/upgrade	544	67	22	93	365
Concerns / queries about where funding is coming from for this / transparency over funds	32	8	1	9	32
Funding should not come in the form of a repayable loan / should be given as a lump sum grant	9	9	1	12	7
Funding should be provided as a repayable loan / not given as a grant	13	1	0	1	13
Would like there to be more consultation / communication with those affected with these vehicle types	5	1	1	2	5
Funding needed for / concerns about funding for personal leisure vehicles e.g. campervans, horseboxes etc	74	3	4	76	5
Funding / financial support will not help / work (e.g. will not help in the long-term)	34	25	0	39	20
Don't agree with fund because don't agree with charges	6	0	0	0	6
Queries about the proposals / information not clear - general comments	147	118	6	176	93
Funding should be higher for vehicles / provide a higher amount to those affected (general)	98	111	6	135	79
Funding amount is too high / too much funding (general)	3	0	0	0	3
Funding should not be available / not needed – should have already upgraded by now / use own money (general)	68	1	3	11	61
Funding does not consider insurance, maintenance, other fees etc	0	4	0	3	1
Unfair funding differences between these affected vehicle types	0	3	0	2	1

Do you have any comments on the proposed Clean Commercial Vehicle Fund? Cont.

	General Public	Business	Representatives	Own an impacted vehicle	No impacted vehicle owned
Funding should be higher for vehicles / provide a higher amount for - coaches	3	0	0	1	2
Funding should be higher for vehicles / provide a higher amount for - minibuses	1	0	0	0	1
Funding should be higher for vehicles / provide a higher amount for - HGVs	3	4	0	4	3
Funding should be higher for vehicles / provide a higher amount for - vans / LGVs	8	10	0	14	4
All those with these vehicle types that operate /t ravel in Greater Manchester and will be affected should be eligible	494	8	4	9	10
Unfair to those located outside the boundary/should be funding to those located outside the boundary but operate in Greater Manchester	21	21	1	31	11
Funding should only be for sole traders / smaller companies / organisations	22	5	0	6	21
Funds should only be for voluntary / community organisations / charities/services	52	0	4	3	52
Should be financial support / reimbursement for those who have already recently upgraded their vehicle/s	0	0	0	0	0
Funding should only be provided to upgrade to hybrid / electric vehicles	13	4	1	1	15
Funding payments should only be paid after new equipment / vehicles have been invested in	0	0	1	0	1
Concerns about performance of electric vehicles	5	4	1	5	3
Concerns about availability of electric charging infrastructure / need more charging points	10	2	0	3	9
Other	48	15	4	17	50
Base	**1575**	**311**	**58**	**487**	**796**

Do you have any comments about the proposed management of the funds?

	General Public	Business	Representatives	Own an impacted vehicle	No impacted vehicle owned
Support the proposed management of funding / eligibility criteria	57	17	6	22	58
Concerns about the funding being mis-managed / needs to be a transparent process	77	14	2	19	74
Queries about the proposals / information not clear - general comments	17	7	0	13	10
Funds should be prioritised for older vehicles / most polluting / where change will have greatest impact	42	13	2	10	46
Funds should be prioritised for those who upgrade to electric / hybrid	3	1	1	0	4
Funds should be prioritised for sole traders /s mall businesses /s mall organisations	163	61	9	79	152
Funds should be prioritised for voluntary / community organisations / charities / services	99	6	5	9	101
Prioritisation of funding should depend on impact of proposals on business / organisation	27	5	3	7	27
Concerns about larger companies accounting for / receiving the majority of the funds available	43	18	1	20	42
Funds should be prioritised for those who have already recently upgraded their vehicle/s / should be reimbursed	5	0	0	0	5
Needs to be well-advertised / promoted to ensure all those affected are aware and know how to apply for funding	10	4	0	7	7
Concerns about people claiming for funding when not needed / trying to commit fraud / abuse the scheme	50	5	2	11	46
Funding should go to those who need it most / should be means tested	51	13	10	19	54
Concerns they may not be able to apply immediately / miss the opportunity	4	2	1	3	4
Depends on how much funding / support is being offered/unclear on proposed funding	1	7	0	8	0
Queries about classification / definition of small businesses	6	2	0	3	5
Proposals do not affect me / my vehicles	8	2	0	7	3
Other	40	7	2	6	43
Base	**538**	**142**	**30**	**196**	**509**

Do you have any comments on the proposed funds for hackney carriages?

	General Public	Business	Represent-atives	Own an impacted vehicle	No impacted vehicle owned
Funding should be available to all vehicle types /f air to all (general)	56	35	1	38	54
Support the proposed funding for Hackney carriages /funding is important / needed to be able to conform/upgrade	458	78	11	82	291
Concerns / queries about where funding is coming from for Hackney carriages / transparency over funds	56	6	2	6	58
Funding for Hackney carriages should not come in the form of a repayable loan / should be given as a lump sum grant	3	10	0	9	4
Funding for Hackney carriages should be provided as a repayable loan / not given as a grant	20	3	1	4	19
Don't agree with fund because don't agree with charges	5	1	0	0	6
Queries about the proposals / information not clear - general comments	47	23	4	24	49
Funding should be higher for Hackney carriages / provide a higher amount to those affected	66	101	14	95	86
Funding amount is too high / too much funding for Hackney carriages	8	2	0	2	8
Funding should not be available for Hackney carriages/not needed – should have already upgraded by now / use own money	206	20	5	37	194
All Hackney carriages that operate / travel in Greater Manchester and will be affected should be eligible	21	25	5	23	26
Funding should only be Hackney carriage sole traders / smaller companies	16	6	0	4	18
Should be financial support / reimbursement for those who have already recently upgraded their Hackney carriages	4	6	2	1	11
Funding for Hackney carriages should only be provided to upgrade to hybrid / electric vehicles	38	5	1	5	39
Funding payments should only be paid after new equipment / Hackney carriages have been invested in	2	1	1	1	3
Funding should only be available to Hackney carriages that are licensed in Greater Manchester.	23	5	2	7	23
Concerns about performance of electric Hackney carriages	3	6	0	6	3
Concerns about availability of electric charging infrastructure / need more charging points for Hackney carriages	22	7	3	5	26

	General Public	Business	Represent-atives	Own an impacted vehicle	No impacted vehicle owned
Out of scope for proposals – impact / lack of enforcement of Uber	31	10	2	10	33
Other	26	9	3	7	30
Base	**947**	**242**	**38**	**258**	**792**

Do you have any comments on the proposed funds for private hire vehicles (e.g. eligibility criteria, funding amounts)?

	General Public	Business	Representatives	Own an impacted vehicle	No impacted vehicle owned
Funding should be available to all vehicle types / fair to all (general comments)	52	45	2	48	51
Support the proposed funding for private hire vehicles / funding is important / needed to be able to conform / upgrade	258	45	8	45	93
Concerns / queries about where funding is coming from for private hire vehicles / transparency over funds	28	5	2	3	32
Funding for private hire vehicles should not come in the form of a repayable loan / should be given as a lump sum grant	1	7	2	6	4
Funding for private hire vehicles should be provided as a repayable loan / not given as a grant	12	1	0	2	11
Don't agree with fund because don't agree with charges	8	2	0	2	8
Queries about the proposals / information not clear - general comments	37	16	3	19	37
Funding should be higher for private hire vehicles / provide a higher amount to those affected	52	68	7	61	63
Funding amount is too high / too much funding for private hire vehicles	20	3	2	6	19
Funding should not be available for private hire vehicles / not needed – should have already upgraded by now / use own money	152	14	3	23	146
All private hire vehicles that operate / travel in Greater Manchester and will be affected should be eligible	19	19	2	19	20
Funding should only be for private hire vehicle sole traders / smaller companies	7	6	0	6	7
Should be financial support / reimbursement for those who have already recently upgraded their private hire vehicles	3	7	1	3	8
Funding for private hire vehicles should only be provided to upgrade to hybrid / electric vehicles	22	7	1	7	22
Funding payments should only be paid after new equipment / private hire vehicles have been invested in	0	0	0	0	0
Funding should only be available for private hire vehicles that are licensed in Greater Manchester.	23	8	3	14	20
Concerns about performance of electric private hire vehicles	1	0	0	0	1

	General Public	Business	Representatives	Own an impacted vehicle	No impacted vehicle owned
Concerns about availability of electric charging infrastructure / need more charging points	8	2	1	1	9
Out of scope for proposals – impact / lack of enforcement of Uber	19	5	1	2	23
Out of scope for proposals – impact / lack of enforcement of taxis registered outside of Greater Manchester (e.g. in Sefton)	39	11	2	15	37
Other	21	4	0	4	21
Base	**658**	**188**	**24**	**202**	**489**

Do you have any comments on the proposed Vehicle Finance Offer?

	General Public	Business	Representatives	Own an impacted vehicle	No impacted vehicle owned
Funding / support should be available to all those affected / fair to all (general comments)	29	10	5	21	22
Support the proposed funding / vehicle finance offer/is important / needed	262	89	11	102	258
Oppose the vehicle finance offer / funding / concern about the vehicle finance offer not providing value for money	131	53	4	69	118
Vehicle finance offer will lead to more debt	40	63	1	70	34
Funding / support should not come in the form of a finance contribution or loan / should be given as a lump sum grant	46	32	4	41	41
Finance/loans provided should be affordable /low / zero interest	34	29	4	29	38
Funding / support should not be available/not needed – should have already upgraded by now / use own money	48	1	0	7	42
Concerns / queries about where funding is coming from for this / transparency over funds/support	55	10	1	13	53
Concerns about the Funding / support being mis-managed	71	6	1	7	71
Would like there to be more consultation/communication with those affected about funding	4	2	0	3	3
Queries about the proposals / information not clear - general comments	30	37	1	47	21
Queries about the proposals / information not clear - vehicle finance offer / funding amount	33	22	2	30	27
Queries about the proposals / information not clear - eligibility for the vehicle finance offer	17	22	3	26	15
Concerns about people claiming for Funding / support when not needed / trying to commit fraud / abuse the scheme	57	4	2	8	55
Funding / support should go to those who need it most / should be means tested	18	2	3	3	20
Should be financial support / reimbursement for those who have already recently upgraded their vehicle/s	3	7	0	4	6
Funding / support should only be paid after new equipment / vehicles have been invested in	6	2	0	0	8
Concerns that they may not be able to apply immediately / missing the opportunity	1	0	1	1	1

	General Public	Business	Representatives	Own an impacted vehicle	No impacted vehicle owned
Needs to be well-advertised / promoted to ensure all those affected are aware and know how to apply for funding	5	1	0	3	3
Funding / support should be prioritised to upgrade to hybrid / electric vehicles	12	1	0	0	13
Funds / support should be prioritised for voluntary / community organisations / charities / services	3	0	1	2	2
Funds/support should be prioritised for older vehicles / most polluting / where change will have greatest impact	5	0	0	1	4
All those that operate / travel in Greater Manchester and will be affected should be eligible for funding/support	6	5	3	11	0
Other	37	15	4	26	30
Base	849	325	41	423	785

Why do you say this about a hardship fund?

	General Public	Business	Representatives	Own an impacted vehicle	No impacted vehicle owned
Funding should available to all those affected/fair to all (general comments)	92	20	1	33	78
Support the proposed funding/funding is important/needed - for affected individuals/businesses /organisations	769	174	37	258	717
Support the proposed funding/funding is important/needed - for me/my business/organisation to survive and continue	11	29	0	36	4
Oppose the hardship funding/it won't help those affected (e.g. will not help long-term)	49	10	1	15	43
Concerns/queries about where funding is coming from for this/transparency over funds	30	0	0	3	27
Concerns about the funding being mis-managed	35	5	1	8	33
Funding should not come in the form of a repayable loan/should be given as a lump sum grant	4	1	0	1	4
Funding should be provided as a repayable loan/not given as a grant	0	1	1	1	1
Funding is needed/important to ensure social equality	85	11	7	23	80
Don't agree with fund because don't agree with charges	15	4	0	4	15
Queries about the proposals/information not clear - general comments	15	7	1	13	10
Funding should be higher for vehicles/provide a higher amount to those affected	53	30	4	36	51
Funding amount is too high/too much funding	6	1	0	2	5
Funding should not be available/not needed – should have already upgraded by now/use own money	79	6	2	13	74
All those that operate/travel in Greater Manchester and will be affected should be eligible	14	1	2	6	9
Concerns about people claiming for funding when not needed/trying to commit fraud/abuse the scheme	73	6	3	7	75
Funding should go to those who need it most/should be means tested	33	5	1	7	31
Should be financial support/reimbursement for those who have already recently upgraded their vehicle/s	1	2	0	0	3
Funding should only be provided to upgrade to hybrid/electric vehicles	2	0	1	0	3

Funding payments should only be paid after new equipment/vehicles have been invested in	2	0	0	0	2
Needs to be well-advertised/promoted to ensure all those affected are aware and know how to apply for funding	9	1	1	2	9
Funds should be prioritised for sole traders/small businesses/small organisations	62	9	4	16	58
Funds should be prioritised for voluntary/community organisations/charities/services	21	1	2	5	19
Other	33	10	3	11	35
Base	**1266**	**284**	**54**	**437**	**1156**

If you are impacted by the proposed clean air zone daily charges, is there any additional support that you would need?

	General Public	Business	Representatives	Own an impacted vehicle	No impacted vehicle owned
No additional support needed/funding and financial support offered is good/fair/appropriate	10	11	0	21	0
Queries about the proposals/information not clear - general comments	2	6	2	9	0
More time needed to allow electric vehicle technology for small goods vehicles to become widely available and cheaper	11	4	2	6	9
More time needed to adapt to the proposals	9	19	2	20	6
Support/counselling should be provided to those whose mental health will be impacted by the proposals	5	5	0	9	1
Should be discounted charges for those who travel within the boundary frequently/those who pay in advance	6	6	0	10	2
Funding should available to all vehicle types/fair to all	5	2	0	5	2
Financial support needed to be able to pay daily charges	16	11	0	20	7
Should be financial support for those relocating outside of Greater Manchester due to the proposals	1	0	0	1	0
Concerns/queries about where funding is coming from for this/transparency over funds	7	1	1	1	7
Funding/financial support should not be available/not needed – should have already upgraded by now/use own money	1	0	0	0	1
More financial support/funding needed to upgrade vehicle/s	83	115	8	164	28
Should be given 100% of total cost/given a compliant vehicle for free	40	34	1	69	6
Should be more financial support/incentives to upgrade to electric/hybrid vehicles	29	3	1	4	28
Funding/financial support should be provided for other costs - insurance, maintenance, other fees etc	1	4	0	3	1
More funding/financial support needed for - sole traders/smaller companies/organisations	20	10	2	12	17
More funding/financial support needed for - voluntary/community organisations/charities/services	4	0	2	5	1

	General Public	Business	Representatives	Own an impacted vehicle	No impacted vehicle owned
All those affected by the proposals should be eligible for funding/financial support	15	15	1	23	5
Needs to be well-advertised/promoted to ensure all those affected are aware and know how to apply for funding/financial	5	1	0	2	4
Concerns about people claiming for funding when not needed/trying to commit fraud/abuse the scheme	1	0	0	0	1
Funding should go to those who need it most/should be means tested	37	15	5	18	36
Concerns about performance/availability of electric vehicles	12	9	3	7	13
Concerns about availability of electric charging infrastructure/need more charging points	71	15	6	14	67
Other	23	34	2	53	4
Base	**360**	**261**	**25**	**396**	**216**

Do you have any other comments on the proposals for the Clean Air Plan as set out in the consultation document?

	General Public	Business	Representatives	Own an impacted vehicle	No impacted vehicle owned
Oppose the proposals (general comments)	651	223	14	360	515
Air quality / pollution is not an issue in Greater Manchester / proposals not needed	87	58	4	73	76
Should be a vote on the proposals	39	10	0	17	31
There are more important areas to be spending the money on	133	16	1	31	117
Proposals are a stealth tax / congestion charge / money-making scheme / financial scam	607	178	12	279	510
Queries about the proposals / information not clear - general comments	27	5	2	7	24
Support the proposals (general comments)	976	40	33	50	318
Proposals should go further (general comments)	894	25	18	24	253
Use the revenue from charges to improve GM / manage back into the economy	63	2	3	6	60
Should be more involvement from those impacted in developing the proposals	26	11	5	12	23
Impact / success of the proposals should be monitored	35	3	1	4	34
Proposals need to be promoted / communicated effectively	57	13	6	15	55
Need other initiatives/measures to improve air quality / environmental impact	469	37	11	75	255
Need better road infrastructure / design / capacity to reduce congestion / improve air quality	222	38	7	63	197
Should be a scrappage scheme for non-compliant vehicles	33	11	13	12	32
Air quality is still an issue from other pollutants	40	6	3	12	36
Put tax / charge on petrol	2	1	0	1	2
More information needed on pollutant reduction	173	0	0	0	0
Delay the proposals / implement at a later date	118	68	12	83	109
Implement the proposals sooner / as soon as possible	797	8	5	11	147
Should include privately cars / motorbikes / mopeds / motorhomes in the proposals	1003	76	25	86	349
Concern about privately owned vehicles being included in the near future	157	8	4	29	138

	General Public	Business	Representatives	Own an impacted vehicle	No impacted vehicle owned
Should accept lower standards for vehicles to be compliant	16	23	1	28	11
Businesses in less polluting areas should not be charged for using vehicles	1	0	0	0	1
Restrict / discourage vehicle use (general comments)	271	12	10	9	103
Should pedestrianise / ban cars from the city centre / introduce a congestion charge	95	14	3	20	89
Vehicles should be charged / penalised for idling	68	7	5	12	62
Target / charge school runs	59	4	3	16	41
Older / most polluting vehicles should be targeted/replaced	112	25	1	30	108
Older vehicles / those already due to be upgraded should receive less funding / financial support	22	4	1	6	21
Too many taxis (Hackney and PHV) on the road already / need to reduce the amount of them	43	5	2	6	43
All taxis (Hackney and PHV) should be cleaner / greener (e.g. electric, hybrid, hydrogen)	42	4	0	7	39
Should promote / encourage more use of active travel (general comments)	199	3	9	2	25
Should promote / encourage more use of buses / public transport (general comments)	273	13	11	18	92
Should be higher standards for vehicles to be compliant	292	21	10	17	126
Encourage vehicle sharing	222	7	7	14	42
Improve public transport	499	40	19	87	455
Improve active travel	137	7	10	15	129
Improve cycling	122	5	0	11	113
Other	112	30	19	28	100
Base	**2778**	**472**	**87**	**708**	**1888**

Taking in to account both the Clean Air Zone and the support offered, what would be the likely impact on you / your business / your organisation?

	General Public	Business	Representatives	Own an impacted vehicle	No impacted vehicle owned
Will have a large/significant impact on me/my business/organisation	24	23	0	34	12
Will have a positive impact on me/my business/organisation	1	0	0	0	1
Will have a negative impact on me/my business/organisation	35	52	3	55	33
Will negatively impact mental health/wellbeing (e.g. stress)	52	10	7	47	17
Queries about the proposals/information not clear - general comments	9	14	1	16	8
Concerned about impact on bus/public transport routes/frequency	28	8	3	7	23
Will improve/encourage active travel/public transport use	7	0	0	0	7
Will cause more congestion/encourage more private car use	93	13	3	23	82
Won't improve air pollution/quality	986	70	17	123	294
Support the proposals/scheme and efforts to improve air pollution/encourage behaviour change/reduce congestion	657	22	18	29	494
Will need to replace vehicle/s	22	33	2	46	10
Will need to replace vehicle/s and am prepared to do this	11	8	2	8	11
Will devalue my vehicle/s/will have to sell vehicle/s	61	33	4	78	16
Concerned that the price of compliant vehicles will increase because of the proposals	21	32	4	33	19
Cannot afford to upgrade my vehicle/s	190	203	14	287	115
Unfair to those who have recently bought a vehicle/s/not yet due for upgrade	10	24	4	23	14
Will add costs/negatively impact use of personal leisure vehicle/s/hobbies/clubs/ events	306	7	10	274	32
Concern about goods/services/fares increasing in price for people	741	92	27	164	671
Will impact me financially/add more costs to my life/activities	241	78	2	229	92
Will have a significant/detrimental impact on me financially (e.g. cause bankruptcy, homelessness)	47	65	1	89	21
Unfair impact to those located just outside of Greater Manchester/who don't qualify for funding	6	5	3	8	4

	General Public	Business	Representatives	Own an impacted vehicle	No impacted vehicle owned
Will increase my business prices to cover costs/charges	20	61	5	62	16
Will negatively impact businesses/trade/economy in Greater Manchester	529	189	31	335	390
Will negatively impact my business/operations/performance	137	284	17	323	109
Will cause me to close my business/lose my job/some will go out of business	126	209	14	243	95
No or small impact	397	51	11	29	428
Will reduce travel into and within GM	68	8	6	34	39
Will cause relocation	62	25	1	50	36
Other	62	21	3	25	58
Base	**2730**	**597**	**85**	**942**	**1761**

Please use this space to tell us about how the Covid-19 pandemic has affected your ability to meet the proposals outlined within the consultation document:

	General Public	Business	Representatives	Own an impacted vehicle	No impacted vehicle owned
No impact on my business / businesses	4	30	2	16	18
Increased financial pressures / income has fallen as a result of Covid-19 (general)	281	279	27	308	272
Proposals are unfair as businesses are already struggling due to Covid-19 (general)	228	104	13	134	209
Debt has increased / cannot afford more debt due to Covid-19	5	44	5	44	7
Savings / reserves have been used up/almost exhausted	8	30	7	33	8
Business may close / cease to operate due to Covid-19	24	40	3	40	26
Business is not eligible for financial support being offered by Government to cope with Covid-19	3	21	3	20	5
Brexit is causing issues / uncertainty about business performance	34	13	4	15	32
Cannot afford to upgrade my vehicle/s due to Covid-19	43	95	7	102	35
Staff job losses due to Covid-19	3	14	4	14	3
No impact on me / individuals/people	80	0	0	17	63
Increased financial pressures / costs for me / individuals / people as a result of Covid-19 (general)	261	55	9	121	201
Covid-19 has made it more difficult to use buses / public transport (e.g. reduced services / frequency/routes)	9	2	0	3	7
Covid-19 has/will increase prices of goods / services/fares	3	0	0	0	3
Covid-19 is having a negative impact on those who are poorer / lower income households	7	1	0	3	5
Concerns about losing my job due to Covid-19	1	0	0	0	1
Covid-19 pandemic is temporary/should not affect / delay proposals	174	2	6	9	172
The need for the proposals should be reviewed due to the improvement in air quality as a result of the Covid-19 lockdown	123	28	9	57	95
Covid-19 has highlighted the need / opportunity to reduce pollution / improve air quality	138	2	9	6	132

	General Public	Business	Representatives	Own an impacted vehicle	No impacted vehicle owned
Concerns about the availability / accessibility of funding / financial support for proposals as a result of Covid-19	31	2	2	1	33
Impact of Covid-19 needs to be considered when setting eligibility criteria for funding / financial support	36	2	2	5	33
Buses / public transport is being used less due to Covid-19/other forms of transport are important / needed for safety	71	6	4	12	65
Covid-19 highlighted the need for better / upgraded vehicles (general)	1	0	0	0	1
More people will/continue to work from home and reduce air pollution as a result of Covid-19 / change in practices	33	2	3	13	24
Other	151	33	4	32	156
Proposals should be delayed until after the Covid-19 pandemic has passed	213	45	14	90	172
Base	**1266**	**411**	**65**	**575**	**1128**

Please use this space to provide any comments on the draft Equality Impact Assessment

	General Public	Business	Representatives	Own an impacted vehicle	No impacted vehicle owned
Support / agree with the Equality Impact Assessment - it is fair / appropriate (general)	25	2	4	1	28
Oppose / disagree with the Equality Impact Assessment - it is unfair / not enough	26	10	0	14	22
Should be no protected characteristics / everyone should be treated equally	30	3	1	5	29
Equality Impact Assessment will not make any difference / does not matter	25	3	0	6	22
Should be more consultation / engagement with those affected about the impact and who should be considered	8	4	1	3	10
Feel that more consideration should be given to the impact on community groups (e.g. equine community)	7	0	1	3	1
Support / agree that it is a protected characteristic - sexual orientation	0	0	0	0	0
Should not be a protected characteristic - sexual orientation	3	0	1	2	2
Queries about the proposals / information not clear - general comments	0	0	0	0	0
Queries about the proposals / information not clear - EQIA	21	2	0	5	18
Proposals will have a positive impact on – children / young people	11	1	1	0	5
Proposals will have a negative impact on / should be more consideration for – children / young people	10	2	1	1	6
Proposals will have a positive impact on - older people	2	1	0	0	2
Proposals will have a negative impact on / should be more consideration for - older people	9	2	1	1	6
Concern about the impact on transport options for older people (e.g. that the proposals will cause isolation)	9	3	1	7	5
Proposals will have a positive impact on – men / males	6	0	0	0	6
Proposals will have a negative impact on / should be more consideration for – men / males	6	2	0	1	7
Proposals will have a positive impact on – women / females	0	0	0	0	0
Proposals will have a negative impact on / should be more consideration for – women / females	2	0	0	1	1

	General Public	Business	Representatives	Own an impacted vehicle	No impacted vehicle owned
Proposals will have a positive impact on – disabled / vulnerable people / those with health issues	8	0	1	1	7
Proposals will have a negative impact on / should be more consideration for - disabled people	23	3	1	11	16
Proposals will have a negative impact on / should be more consideration for - those with health issues	9	2	2	2	4
Concern about the impact on transport options for disabled (e.g. that the proposals will cause isolation)	35	10	5	17	29
Concern that not all disabilities / health issues will be considered	12	1	1	2	10
Proposals will have a positive impact on – pregnancy / maternity	0	0	0	0	0
Proposals will have a negative impact on / should be more consideration for – pregnancy / maternity	0	0	0	0	0
Proposals will have a positive impact on - certain ethnic / religious groups	0	0	0	0	0
Proposals will have a negative impact on / should be more consideration for - certain ethnic / religious groups	8	8	2	7	11
Concerns that funding / financial support will not be available/suitable to certain ethnic / religious groups	6	0	0	1	5
Proposals will have a positive impact on - poorest/ lowest income households / people	2	0	1	0	2
Proposals will have a negative impact on /should be more consideration for – poorest / lowest income households / people	120	23	8	56	87
Support age and gender	5	0	0	1	4
Support disability and pregnant	10	1	1	4	8
Support ethnicity and religion	4	0	0	0	4
Do not support age and gender	2	0	0	1	1
Do not support disability and pregnant	0	0	0	0	0
Do not support ethnicity and religion	3	0	0	1	2
Other	15	4	0	3	16
Base	**346**	**65**	**24**	**116**	**286**

The proposed Clean Air Zone boundary would follow the existing administrative boundary of Greater Manchester as closely as possible. Do you have any comments on this?

	Bus	Coach	Minibus	Leisure Vehicle	LGV	HGV	PHV	Hackney Carriage	Private car	Other vehicle	None
Zone / boundary / areas covered is fair / appropriate / reasonable	1	1	5	4	16	4	7	1	263	20	78
Concerns about redistributing traffic / congestion / air quality problems to surrounding areas (outside boundary)	1	1	2	15	16	2	1	0	61	8	14
Will negatively impact people living on the GM boundary	1	0	3	38	48	4	3	1	70	12	3
Should be different boundaries for different vehicles	0	1	0	11	2	1	1	0	12	3	0
Will negatively impact people travelling to and from Manchester Airport	1	0	1	0	1	0	2	0	2	0	0
City centre should be a ULEZ	1	1	0	0	1	0	1	0	0	0	1
Queries about the proposals / information not clear - general comments	0	0	1	1	9	3	1	2	37	8	5
Queries about the proposals / information not clear - boundary	0	0	0	1	10	2	1	0	35	3	4
Should make the zone larger (UK wide/national scale)	0	0	0	0	5	0	3	1	24	0	2
Should include specific roads / areas	0	0	0	0	1	0	0	0	22	3	3
Should include the Motorway / Strategic Road Network	0	0	1	0	6	2	1	0	47	6	5
Should exclude specific roads / areas	1	2	0	4	4	3	0	1	19	1	2
Boundary should focus on city centre only / M60 boundary	1	2	4	20	63	9	5	6	116	19	9
Zone / areas covered is too big	4	5	6	27	89	18	5	25	169	21	10
Zone / areas covered should just be those with poor air quality / city centre and towns / high-risk areas	0	2	5	4	26	6	4	2	68	7	4
Make zone wider NW / general	0	0	0	2	6	1	1	1	25	1	10
Other	1	0	1	3	9	2	3	1	31	3	10
Base	**9**	**11**	**20**	**90**	**208**	**39**	**30**	**38**	**782**	**86**	**134**

The Clean Air Zone would operate 24 hours a day, seven days a week, signage would be used to clearly identify the Clean Air Zone, and the daily charges would apply from midnight to midnight. Do you have any comments on these proposals?

	Bus	Coach	Minibus	Leisure Vehicle	LGV	HGV	PHV	Hackney Carriage	Private car	Other vehicle	None
Oppose the proposed operation times	5	1	5	14	34	4	4	9	108	14	11
Support the proposed operation times	1	1	5	1	17	3	2	1	287	26	102
Concerns about signage / need to provide clear / easily visible signs	3	2	1	3	14	4	1	1	78	6	18
Concerns / doubts about the implementation / enforcement of the clean air zone	0	0	1	1	10	4	2	1	51	5	9
Should only be charged once within a 24-hour period	1	1	4	4	13	1	2	0	27	2	3
Suggest the time between 24-hour periods should be different / midnight should not be the end / start between 24-hour period	0	0	1	0	2	0	0	0	6	1	1
Unfair to those who do not spend long travelling within the boundary / travel a short distance	0	0	0	0	1	1	0	0	2	1	0
Do not charge for evening / night journeys / only charge in daytime	1	1	6	13	21	5	4	6	91	15	10
Do not charge for weekend travel	1	1	3	19	16	1	4	3	37	5	4
Change the hours of operation to peak times / hours only	0	0	3	12	23	2	9	7	59	8	3
Queries - general	0	2	0	1	1	0	3	1	6	0	0
Other	0	0	1	1	9	3	1	0	30	6	8
Base	**10**	**9**	**21**	**60**	**138**	**23**	**26**	**26**	**690**	**78**	**159**

Do you have any comments on the proposed charges?

	Bus	Coach	Minibus	Leisure Vehicle	LGV	HGV	PHV	Hackney Carriage	Private car	Other vehicle	None
Oppose the proposed charges / disagree with the charges (e.g. seem unjustified / counterintuitive / won't make a difference)	5	5	6	65	147	27	38	29	401	36	24
Support the proposed charges/they are good / fair	1	0	1	3	7	0	0	0	73	3	32
Charges should be the same amount for all affected vehicle types	1	1	0	0	2	0	1	0	12	0	3
Differences between charge amounts is unfair	0	0	1	1	4	0	1	0	12	1	1
Charges should be based on mileage	0	0	0	5	8	0	0	1	18	2	1
Charge should be higher for travelling during peak times	0	0	1	4	11	2	1	1	39	1	4
Charge only those who travel in / around city centre most frequently	0	0	0	3	8	2	0	0	14	1	0
Charges should be dependent on the size of the vehicle	0	0	0	1	3	1	0	0	11	0	0
Charges should be dependent on the emissions of the vehicle	0	0	2	1	9	2	2	0	54	4	6
Suggest that the charges should be paid for weekly / monthly / annual periods rather than daily	0	0	0	2	5	3	0	1	16	3	1
Queries about the proposals / information not clear - general comments	2	1	2	5	6	1	4	2	34	9	2
Queries about the proposals / information not clear - charges	3	2	3	8	14	5	4	2	74	13	10
Charges are too high / should be lower (general)	0	0	4	53	95	21	34	21	242	24	18
Charges are too high / should be lower for - buses	4	8	2	3	10	1	3	1	66	5	14
Charges are too high / should be lower for - coaches	4	7	1	2	6	0	3	0	27	1	3
Charges are too high / should be lower for - HGVs	0	1	0	3	6	7	1	0	21	1	2
Charges are too high / should be lower for - vans / LGVs	0	0	0	0	22	1	1	0	30	0	2
Charges are too high / should be lower for - minibuses	0	0	1	0	1	0	1	0	11	0	1
Charges are too high / should be lower for - Hackney carriages	0	0	0	0	2	0	4	8	25	1	1

Do you have any comments on the proposed charges? (cont.)

	Bus	Coach	Minibus	Leisure Vehicle	LGV	HGV	PHV	Hackney Carriage
Charges are too high / should be lower for - private hire vehicles	1	0	0	2	2	0	9	3
Charges are too high / should be lower for - private leisure vehicles	3	0	0	40	13	1	1	0
Charges are too low / should be higher (general)	1	0	0	1	4	1	2	1
Charges are too low / should be higher for - buses	1	1	0	1	3	0	0	0
Charges are too low / should be higher for - HGVs	0	0	0	1	0	0	0	0
Charges are too low / should be higher for - vans / LGVs	0	0	0	0	0	0	0	0
Charges are too low / should be higher for - Hackney carriages	1	1	0	1	4	0	0	0
Charges are too low / should be higher for - private hire vehicles	1	1	0	0	2	0	0	0
Charges are too low / should be higher for - other vehicle types	1	1	0	0	1	0	0	0
Other	1	0	0	9	12	4	1	3
Base	**18**	**15**	**20**	**152**	**308**	**61**	**87**	**58**

To what extent do you agree or disagree with the permanent local exemptions? Why do you say this?

	Bus	Coach	Minibus	Leisure Vehicle	LGV	HGV	PHV	Hackney Carriage	Private car	Other vehicle	None
Support / agree with the permanent local exemptions / they are fair	12	7	14	70	162	41	29	31	831	89	128
Permanent local exemptions are not needed / should have upgraded already	0	0	0	3	3	0	1	0	19	1	1
Disagree with the permanent exemptions (general)	9	6	1	26	51	11	18	8	218	14	47
Proposed permanent exemptions are unfair / more vehicles should be temporarily exempt (general)	2	1	1	5	9	2	0	1	22	2	3
Concern about enforcement of permanent exemptions / ensuring they are not abused	1	1	1	3	6	0	4	0	96	6	12
Exemptions should be temporary	1	0	0	0	6	1	0	0	31	3	10
Permanent exemptions should be regularly reviewed	0	0	1	0	1	1	0	0	12	2	3
Should be permanently exempt - buses	3	1	1	7	10	1	4	3	69	8	9
Should be permanently exempt - taxis	0	0	3	4	7	2	22	32	54	4	5
Should be permanently exempt - vehicles used by disabled / vulnerable users	1	2	1	12	28	4	8	15	120	11	24
Should be permanently exempt - specialist vehicles (e.g. adapted vehicles that would be difficult / impractical to upgrade)	4	0	1	6	12	6	0	1	17	6	2
Should be permanently exempt - private leisure vehicles (e.g. horsebox, motorhome)	2	1	0	116	80	11	2	3	132	29	4
Should be permanently exempt - business vehicles	2	1	3	3	23	2	2	1	36	3	4
Should be permanently exempt - businesses with multiple vehicles should have at least one permanently exempt	1	1	0	0	3	0	0	0	1	0	0
GM residents should be permanently exempt	2	1	1	4	21	0	1	0	24	4	4

To what extent do you agree or disagree with the permanent local exemptions? Why do you say this? (cont.)

	Bus	Coach	Minibus	Leisure Vehicle	LGV	HGV	PHV	Hackney Carriage	Private car	Other vehicle	None
Should NOT be permanently exempt - disabled passenger vehicles	3	1	3	6	21	4	0	2	98	7	16
Should NOT be permanently exempt - emergency service vehicles	0	0	0	1	0	0	0	0	2	1	0
Should NOT be permanently exempt - specialist vehicles (e.g. adapted vehicles)	0	0	0	3	3	2	0	0	24	1	6
Should NOT be permanently exempt - driving within the zone due to a road diversion	0	0	0	0	2	0	0	1	33	3	11
Motorway diversions are hard to manage	0	0	0	0	1	1	0	0	25	4	5
Major roads should be permanently exempt	0	0	0	2	2	0	0	0	3	0	0
Prolonged / long-term diversions should not be permanently exempt / should be temporary	0	0	0	0	0	0	0	0	4	1	1
SHOULD LGV and HGV	0	0	0	6	11	4	3	0	16	2	0
SHOULD NOT Historic and military	0	0	0	1	4	0	1	0	15	1	7
SHOULD NOT Community minibuses and non-road going vehicles	0	0	0	0	0	0	0	0	8	0	1
Permanent Exempt coach and minibus	1	1	1	1	2	0	1	0	10	1	1
Queries - general	2	1	5	11	36	10	3	3	103	20	23
Other	1	0	1	7	5	1	1	5	32	5	6
Base	**26**	**17**	**20**	**185**	**329**	**75**	**73**	**77**	**1477**	**148**	**235**

To what extent do you agree or disagree with the temporary local exemptions? Why do you say this?

	Bus	Coach	Minibus	Leisure Vehicle	LGV	HGV	PHV	Hackney Carriage	Private car	Other vehicle	None
Support / agree with the temporary local exemptions / they are fair	13	8	12	50	148	36	31	21	686	58	107
Enough time to upgrade to compliant vehicles	0	0	1	3	8	2	0	1	53	5	15
Two years is not enough for the temporary exemption / need longer	3	3	7	24	84	15	16	26	215	21	20
Temporary local exemptions are not needed/should have upgraded already	0	1	0	0	4	0	1	0	28	1	14
Disagree with the temporary exemptions (general)	0	1	1	7	15	6	3	6	103	12	22
Temporary local exemptions will not help / will not be able to afford to upgrade even if given more time	0	0	0	8	13	0	1	3	15	0	4
Proposed temporary exemptions are unfair / more vehicles should be temporarily exempt (general)	0	0	0	3	3	3	0	0	10	2	1
Should be temporary for vehicles until they are due for an upgrade	0	0	0	3	21	4	4	14	56	6	6
Concern about enforcement / ensuring they are not abused	1	1	2	1	2	0	1	0	14	2	8
Temporary exemptions should be regularly reviewed	0	0	0	0	0	0	0	0	2	0	1
Vehicles should be temporarily exempt until Covid-19 has passed	0	0	0	1	1	0	0	3	3	0	0
Temporary exemptions should be shorter	2	1	0	0	4	0	1	0	140	8	38
Incentivise behaviour change / need more incentives for upgrades	0	0	0	2	12	3	0	0	45	3	5
Should NOT be temporarily exempt - vans / LGVs	0	0	0	0	0	0	0	0	11	0	4
Should be temporarily exempt - private leisure vehicles	0	0	0	5	2	2	0	0	9	2	2
Should be temporarily exempt - HGVs	0	0	0	1	4	6	0	0	6	0	0
Bus coach and minibus	0	0	0	0	2	1	0	0	1	0	0
Should not be temporarily exempt taxis	0	0	0	1	3	1	0	1	15	0	4
Should be exempt taxis	0	0	1	1	2	0	3	3	15	0	2
Should be exempt specialist all	1	0	0	1	3	2	2	0	10	2	3
Queries - general	1	1	0	6	7	0	0	0	26	2	4
Other	0	0	0	1	1	1	3	2	13	2	0
Base	**17**	**12**	**21**	**97**	**268**	**64**	**56**	**67**	**1209**	**104**	**199**

To what extent do you agree or disagree with the permanent local discounts? Why do you say this?

	Bus	Coach	Minibus	Leisure Vehicle	LGV	HGV	PHV	Hackney Carriage	Private car	Other vehicle	None
Support / agree with the permanent local discounts / they are fair / helpful	3	1	4	51	49	9	32	7	270	27	49
They are not needed / should have upgraded already / should have to pay	4	5	2	7	48	16	5	5	315	17	81
Leisure vehicles over 3.5 tonnes should not be offered discounts	0	0	0	0	6	1	0	0	32	2	11
Private hire vehicles should not be offered discounts	0	1	1	5	23	4	0	1	70	6	15
Discounts should depend on vehicle age / pollution it causes	0	0	0	2	0	0	0	0	5	0	1
Concerns that the discounts will result in people not upgrading	0	0	0	0	3	0	0	0	48	4	16
Concerns about discounts being abused / how these will be enforced	0	0	1	1	7	2	1	3	111	7	20
Queries about the proposals / information not clear - general comments	0	0	0	4	4	0	0	0	13	3	5
Queries about the proposals / information not clear - discounts	1	1	0	5	11	2	0	0	40	3	4
Discounts should be higher (general)	0	0	0	5	1	0	1	0	9	2	0
Discounts should be higher for leisure vehicles over 3.5 tonnes	0	0	1	3	1	1	0	0	3	1	0
Discounts should be higher for private hire vehicles	0	0	1	0	0	0	1	0	2	0	0
Discounts should be lower (general)	0	0	0	0	0	0	0	0	2	0	0
Discounts should be lower for leisure vehicles over 3.5 tonnes	0	0	0	0	1	0	0	0	1	0	0
Discounts should be lower for private hire vehicles	0	0	0	0	0	0	0	0	1	0	1
Discounts should be higher due to / until through the Covid-19 pandemic	0	0	0	0	0	0	0	0	1	0	0
Discounts should be offered for more vehicles / affected people (general)	1	0	0	6	4	1	2	0	12	3	0
Discounts should be offered for - Hackney carriages	0	0	0	0	1	1	1	19	13	0	3
Discounts should be offered for - leisure vehicles under 3.5 tonnes	0	0	0	6	14	1	0	0	14	6	1
Discounts should be offered for - business vehicles	0	0	0	1	4	1	0	0	6	0	0
Discounts should be offered for - those who are located outside of Greater Manchester but operate within the region	0	0	1	13	7	2	2	0	20	3	2
Bus coach and minibus	0	0	1	0	1	0	1	1	6	0	1
Other	2	0	1	0	2	0	1	0	26	1	2
Base	**10**	**8**	**12**	**98**	**173**	**38**	**46**	**35**	**929**	**79**	**188**

Do you have any comments on the proposed Clean Bus Fund?

	Bus	Coach	Minibus	Leisure Vehicle	LGV	HGV	PHV	Hackney Carriage	Private car	Other vehicle	None
Funding should be available to all vehicle types /f air to all (general comments)	0	2	3	18	36	14	16	9	98	14	9
Support the proposed funding / funding is important / needed to be able to conform / upgrade	4	5	3	16	36	5	13	9	375	31	82
Concerns / queries about where funding is coming from for this / transparency over funds	0	0	0	0	5	1	1	0	34	2	0
Funding should be provided as a repayable loan / not given as a grant	0	0	0	0	1	0	0	0	13	3	1
Don't agree with fund because don't agree with charges	0	0	0	0	0	0	0	0	1	1	0
Queries about the proposals / information not clear - funding amount / provision / conditions	1	1	3	2	10	3	3	2	41	3	4
Funding amount is too high / too much funding	0	0	0	0	2	0	0	2	19	0	4
Funding should not be available / not needed – should have already upgraded by now / use own money	3	0	2	9	39	9	7	11	197	14	37
Funding does not consider insurance, maintenance, other fees etc	0	0	0	0	0	0	0	0	1	0	0
Funding should only be for sole traders / smaller companies	1	2	1	2	6	3	6	1	17	1	8
Funding should only be provided to upgrade to hybrid / electric vehicles	0	0	1	0	6	3	1	0	60	4	11
Concerns about performance of electric buses	0	0	0	0	0	0	0	0	4	0	0
Concerns about availability of electric charging infrastructure / need more charging points	0	0	0	0	2	0	0	0	7	0	0
Other	1	1	0	5	4	1	2	4	66	6	9
All bus companies / operators that operate / travel in Greater Manchester and will be affected should be eligible	4	6	1	7	20	11	6	3	45	5	8
Should be given more funding	2	2	2	0	19	6	10	11	61	3	9
Payment of funds	1	0	2	0	0	0	0	1	10	3	2
Queries other	2	1	3	6	18	4	3	1	53	8	5
Base	**15**	**14**	**15**	**57**	**166**	**44**	**51**	**40**	**927**	**80**	**163**

Do you have any comments about the proposed management of the funds?

	Bus	Coach	Minibus	Leisure Vehicle	LGV	HGV	PHV	Hackney Carriage	Private car	Other vehicle	None
Support the proposed management of funding / eligibility criteria	1	0	0	2	4	1	7	2	47	3	12
Concerns about the funding being mis-managed/needs to be a transparent process	1	1	1	5	21	4	2	4	90	7	13
Queries about the proposals / information not clear - general comments	0	0	0	2	5	0	6	3	18	3	1
Funds should be prioritised for older vehicles / most polluting / where change will have greatest impact	7	5	5	8	32	12	6	5	231	17	50
Funds should be prioritised for those who upgrade to electric / hybrid	0	0	0	0	1	0	0	0	8	0	5
Funds should be prioritised for sole traders/small businesses organisations	1	1	1	1	13	4	5	2	40	4	6
Funds should be prioritised for voluntary / community organisations / charities / services	0	0	1	0	0	0	0	0	8	1	3
Prioritisation of funding should depend on impact of proposals on the business / organisation	0	0	0	0	1	1	1	0	9	0	3
Concerns about larger companies accounting for/receiving the majority of the funds available	3	4	1	0	6	0	4	2	24	2	4
Funds should be prioritised for those who have already recently upgraded their vehicle/s / should be reimbursed	0	0	0	1	0	0	0	1	8	0	1
Funds should be prioritised for buses / vehicles carrying most passengers	0	0	0	1	1	0	0	0	10	1	4
Needs to be well-advertised/promoted to ensure all those affected are aware and know how to apply for funding	0	0	0	1	2	1	3	0	2	1	0
Concerns about people claiming for funding when not needed / trying to commit fraud / abuse the scheme	0	0	0	4	11	4	2	1	57	2	12
Funding should go to those who need it most / should be means tested	1	1	1	3	8	1	0	0	35	4	5
Concerns that they may not be able to apply immediately / missing the opportunity	0	0	0	2	0	0	1	0	2	0	1
Should be first-come-first serve	0	0	1	0	0	0	0	0	3	1	1
Older vehicles are not necessarily the most polluting / should not focus on oldest vehicles	1	1	3	0	7	2	0	0	40	1	1
Other	3	2	3	4	11	2	4	2	48	3	5
Base	**10**	**9**	**11**	**27**	**87**	**24**	**32**	**17**	**518**	**44**	**95**

Do you have any comments on the proposed Clean Commercial Vehicle Fund?

	Bus	Coach	Minibus	Leisure Vehicle	LGV	HGV	PHV	Hackney Carriage	Private car	Other vehicle	None
Funding should be available to all vehicle types / fair to all (general comments)	1	1	2	10	25	7	5	3	59	2	4
Support the proposed funding / funding is important / needed to be able to conform / upgrade	2	6	9	19	58	16	8	8	334	25	62
Concerns / queries about where funding is coming from for this/transparency over funds	0	0	0	0	7	1	1	0	32	5	2
Funding should not come in the form of a repayable loan / should be given as a lump sum grant	0	0	1	1	9	2	1	0	15	3	0
Funding should be provided as a repayable loan / not given as a grant	0	0	0	0	1	0	0	0	12	1	1
Would like there to be more consultation / communication with those affected with these vehicle types	0	0	0	1	1	0	0	0	5	0	1
Funding needed for / concerns about funding for personal leisure vehicles e.g. campervans, horseboxes etc	0	0	0	36	39	3	1	0	41	8	0
Funding / financial support will not help / work (e.g. will not help in the long-term)	0	1	2	2	27	4	5	4	39	3	1
Don't agree with fund because don't agree with charges	0	0	0	0	0	0	0	0	5	0	1
Queries about the proposals / information not clear - general comments	2	3	9	23	120	33	9	7	165	24	13
Funding should be higher for vehicles / provide a higher amount to those affected (general)	0	2	4	8	92	22	17	14	123	11	9
Funding amount is too high / too much funding (general)	0	0	0	0	0	0	0	0	3	0	0
Funding should not be available / not needed – should have already upgraded by now / use own money (general)	0	0	0	2	9	0	0	1	52	3	14
Funding does not consider insurance, maintenance, other fees etc	0	0	0	0	2	1	1	0	2	0	0
Unfair funding differences between these affected vehicle types	0	0	0	0	1	2	0	0	2	0	0

Do you have any comments on the proposed Clean Commercial Vehicle Fund? Cont.

	Bus	Coach	Minibus	Leisure Vehicle	LGV	HGV	PHV	Hackney Carriage	Private car	Other vehicle	None
Funding should be higher for vehicles / provide a higher amount for - coaches	1	1	0	0	0	0	0	0	1	0	1
Funding should be higher for vehicles / provide a higher amount for - minibuses	0	0	0	0	0	0	0	0	1	0	0
Funding should be higher for vehicles / provide a higher amount for - HGVs	0	0	0	0	1	4	0	0	3	0	0
Funding should be higher for vehicles / provide a higher amount for - vans / LGVs	0	0	1	1	13	1	1	0	11	0	0
All those with these vehicle types that operate / travel in Greater Manchester and will be affected should be eligible	0	0	0	1	8	2	0	0	11	1	2
Unfair to those located outside the boundary / should be funding to those located outside the boundary but operate in Greater Manchester	1	3	1	5	23	9	2	1	25	1	1
Funding should only be for sole traders / smaller companies/organisations	1	1	0	0	2	1	1	0	18	3	6
Funds should only be for voluntary / community organisations / charities / services	0	0	0	2	1	0	0	0	43	3	12
Should be financial support / reimbursement for those who have already recently upgraded their vehicle/s	0	0	0	0	0	0	0	0	0	0	0
Funding should only be provided to upgrade to hybrid / electric vehicles	0	0	0	0	1	0	0	0	15	0	1
Funding payments should only be paid after new equipment / vehicles have been invested in	0	0	0	0	0	0	0	0	1	0	0
Concerns about performance of electric vehicles	0	0	0	0	4	0	0	1	6	0	0
Concerns about availability of electric charging infrastructure / need more charging points	0	0	0	0	2	0	0	1	10	0	1
Other	1	2	0	1	14	2	2	1	49	5	9
Base	**7**	**14**	**23**	**80**	**320**	**72**	**42**	**34**	**884**	**83**	**121**

Do you have any comments about the proposed management of the funds?

	Bus	Coach	Minibus	Leisure Vehicle	LGV	HGV	PHV	Hackney Carriage	Private car	Other vehicle	None
Support the proposed management of funding / eligibility criteria	0	0	1	3	11	6	2	4	50	6	13
Concerns about the funding being mis-managed/needs to be a transparent process	1	1	0	3	10	2	2	2	79	6	5
Queries about the proposals / information not clear - general comments	0	0	0	1	12	1	0	0	15	2	2
Funds should be prioritised for older vehicles / most polluting / where change will have greatest impact	0	0	0	1	9	2	0	0	44	4	6
Funds should be prioritised for those who upgrade to electric / hybrid	0	0	0	0	0	0	0	0	3	1	1
Funds should be prioritised for sole traders / small businesses / organisations	1	4	4	13	53	12	10	4	155	15	28
Funds should be prioritised for voluntary / community organisations / charities / services	0	0	1	1	8	1	1	0	85	5	20
Prioritisation of funding should depend on impact of proposals on business / organisation	0	0	0	2	4	3	0	0	25	0	5
Concerns about larger companies accounting for / receiving the majority of the funds available	1	0	2	1	12	3	1	5	41	4	8
Funds should be prioritised for those who have already recently upgraded their vehicle/s / should be reimbursed	0	0	0	0	0	0	0	0	4	0	1
Needs to be well-advertised / promoted to ensure all those affected are aware and know how to apply for funding	0	0	0	0	7	2	1	0	9	0	0
Concerns about people claiming for funding when not needed/trying to commit fraud / abuse the scheme	1	1	2	2	8	2	2	0	43	3	9
Funding should go to those who need it most / should be means tested	2	1	1	2	11	2	2	1	51	5	11
Concerns they may not be able to apply immediately / miss the opportunity	0	0	0	0	3	1	0	0	6	0	0
Depends on how much Funding / support is being offered/unclear on proposed funding	0	0	0	0	4	2	1	1	3	0	0
Queries about classification n/ definition of small businesses	0	0	0	1	2	0	0	0	6	0	0
Proposals do not affect me / my vehicles	0	0	0	4	4	1	1	0	6	0	1
Other	1	1	0	2	4	1	0	1	38	1	7
Base	**5**	**7**	**9**	**33**	**126**	**32**	**17**	**16**	**501**	**39**	**87**

Do you have any comments on the proposed funds for hackney carriages?

	Bus	Coach	Minibus	Leisure Vehicle	LGV	HGV	PHV	Hackney Carriage	Private car	Other vehicle	None
Funding should be available to all vehicle types / fair to all (general)	0	0	1	3	15	3	13	11	58	6	6
Support the proposed funding for Hackney carriages / funding is important / needed to be able to conform / upgrade	2	3	5	11	19	3	29	34	248	14	51
Concerns / queries about where funding is coming from for Hackney carriages / transparency over funds	0	0	0	1	5	0	1	1	52	3	8
Funding for Hackney carriages should not come in the form of a repayable loan / should be given as a lump sum grant	0	0	0	0	2	1	1	8	3	0	0
Funding for Hackney carriages should be provided as a repayable loan / not given as a grant	0	0	0	0	2	0	1	1	18	0	2
Don't agree with fund because don't agree with charges	0	0	0	0	0	0	1	0	5	1	0
Queries about the proposals / information not clear - general comments	0	0	1	2	6	1	6	11	42	4	11
Funding should be higher for Hackney carriages / provide a higher amount to those affected	0	0	2	4	12	0	29	65	88	6	10
Funding amount is too high / too much funding for Hackney carriages	0	0	0	0	2	1	0	0	8	0	1
Funding should not be available for Hackney carriages / not needed – should have already upgraded by now / use own money	2	1	0	11	25	10	1	2	182	10	30
All Hackney carriages that operate / travel in Greater Manchester and will be affected should be eligible	1	0	1	2	4	1	6	16	19	1	7
Funding should only be Hackney carriage sole traders / smaller companies	0	0	0	0	2	1	2	2	14	2	4
Should be financial support / reimbursement for those who have already recently upgraded their Hackney carriages	0	0	0	0	0	0	0	7	6	0	0
Funding for Hackney carriages should only be provided to upgrade to hybrid / electric vehicles	1	1	0	0	5	0	0	1	35	3	6
Funding payments should only be paid after new equipment / Hackney carriages have been invested in	0	1	0	0	0	0	0	0	1	1	1
Funding should only be available to Hackney carriages that are licensed in Greater Manchester.	0	1	1	1	4	0	3	1	21	4	3
Concerns about performance of electric Hackney carriages	0	0	0	0	0	0	0	6	6	0	0

	Bus	Coach	Minibus	Leisure Vehicle	LGV	HGV	PHV	Hackney Carriage	Private car	Other vehicle	None
Concerns about availability of electric charging infrastructure / need more charging points for Hackney carriages	0	0	0	0	1	0	0	4	24	0	4
Out of scope for proposals – impact / lack of enforcement of Uber	1	0	0	1	2	0	3	6	29	1	8
Other	0	0	1	2	2	0	4	5	26	2	2
Base	**7**	**7**	**12**	**32**	**91**	**19**	**73**	**105**	**712**	**51**	**122**

Do you have any comments on the proposed funds for private hire vehicles (e.g. eligibility criteria, funding amounts)?

	Bus	Coach	Minibus	Leisure Vehicle	LGV	HGV	PHV	Hackney Carriage	Private car	Other vehicle	None
Funding should be available to all vehicle types / fair to all (general comments)	0	0	1	3	16	4	18	15	60	5	3
Support the proposed funding for private hire vehicles / funding is important / needed to be able to conform / upgrade	0	1	3	2	8	0	25	15	76	8	19
Concerns / queries about where funding is coming from for private hire vehicles / transparency over funds	0	0	0	1	2	0	0	0	28	0	6
Funding for private hire vehicles should not come in the form of a repayable loan / should be given as a lump sum grant	0	0	1	0	0	0	3	3	3	0	0
Funding for private hire vehicles should be provided as a repayable loan / not given as a grant	0	0	0	0	1	0	1	0	11	0	1
Don't agree with fund because don't agree with charges	0	0	0	1	1	0	1	0	7	1	0
Queries about the proposals / information not clear - general comments	0	0	0	1	2	0	15	0	31	2	10
Funding should be higher for private hire vehicles / provide a higher amount to those affected	0	0	4	3	7	0	48	11	64	6	7
Funding amount is too high / too much funding for private hire vehicles	1	1	2	0	2	0	0	3	17	1	3
Funding should not be available for private hire vehicles / not needed – should have already upgraded by now / use own money	3	0	0	7	12	6	1	4	139	9	16
All private hire vehicles that operate / travel in Greater Manchester and will be affected should be eligible	0	0	1	3	3	1	7	9	15	1	6
Funding should only be for private hire vehicle sole traders / smaller companies	1	1	0	0	0	0	4	1	4	1	2
Should be financial support / reimbursement for those who have already recently upgraded their private hire vehicles	0	0	0	0	0	0	4	4	5	0	0
Funding for private hire vehicles should only be provided to upgrade to hybrid / electric vehicles	1	1	1	0	4	1	2	0	22	2	2
Funding payments should only be paid after new equipment / private hire vehicles have been invested in	0	0	0	0	0	0	0	0	0	0	0
Funding should only be available for private hire vehicles that are licensed in Greater Manchester.	0	1	1	2	8	0	4	2	26	1	2
Concerns about performance of electric private hire vehicles	0	0	0	0	0	0	0	0	1	0	0

	Bus	Coach	Minibus	Leisure Vehicle	LGV	HGV	PHV	Hackney Carriage	Private car	Other vehicle	None
Concerns about availability of electric charging infrastructure/need more charging points	0	0	0	0	0	0	1	0	6	0	3
Out of scope for proposals – impact / lack of enforcement of Uber	0	0	0	0	1	0	2	1	20	1	4
Out of scope for proposals – impact / lack of enforcement of taxis registered outside of Greater Manchester (e.g. in Sefton)	0	0	1	2	8	2	1	3	40	4	5
Other	1	1	2	1	4	0	1	1	21	2	2
Base	**6**	**4**	**11**	**21**	**64**	**12**	**87**	**49**	**456**	**35**	**73**

Do you have any comments on the proposed Vehicle Finance Offer?

	Bus	Coach	Minibus	Leisure Vehicle	LGV	HGV	PHV	Hackney Carriage	Private car	Other vehicle	None
Funding / support should be available to all those affected / fair to all (general comments)	0	0	1	7	9	2	4	2	25	3	4
Support the proposed funding / vehicle finance offer / it is important / needed	1	3	3	16	54	16	25	14	240	19	49
Oppose the vehicle finance offer / funding / concern about the vehicle finance offer not providing value for money	3	0	2	8	43	7	11	10	135	7	11
Vehicle finance offer will lead to more debt	0	0	0	10	25	6	24	21	50	3	3
Funding / support should not come in the form of a finance contribution or loan/should be given as a lump sum grant	2	3	4	6	22	2	8	5	50	7	6
Finance / loans provided should be affordable / low / zero interest	0	0	1	0	8	2	12	12	36	3	3
Funding / support should not be available / not needed – should have already upgraded by now / use own money	1	1	1	1	4	1	0	0	45	2	2
Concerns / queries about where funding is coming from for this / transparency over funds / support	0	0	0	5	3	0	2	4	50	4	8
Concerns about the Funding / support being mis-managed	1	1	1	1	6	2	2	1	62	5	10
Would like there to be more consultation / communication with those affected about funding	0	1	0	1	1	1	0	0	4	0	0
Queries about the proposals / information not clear - general comments	0	1	2	1	32	6	5	6	33	2	5
Queries about the proposals / information not clear - vehicle finance offer/funding amount	0	1	1	4	14	3	8	5	35	3	2
Queries about the proposals / information not clear - eligibility for the vehicle finance offer	0	0	2	0	15	2	4	7	23	6	2
Concerns about people claiming for Funding / support when not needed / trying to commit fraud / abuse the scheme	1	1	1	1	7	1	0	0	50	2	8
Funding / support should go to those who need it most / should be means tested	0	0	0	0	3	0	0	2	13	2	7
Should be financial support / reimbursement for those who have already recently upgraded their vehicle/s	0	0	0	0	2	1	1	5	3	1	1
Funding / support should only be paid after new equipment / vehicles have been invested in	0	0	0	0	0	0	0	1	7	0	0

	Bus	Coach	Minibus	Leisure Vehicle	LGV	HGV	PHV	Hackney Carriage	Private car	Other vehicle	None
Concerns that they may not be able to apply immediately / missing the opportunity	0	0	0	0	1	0	0	0	2	1	0
Needs to be well-advertised / promoted to ensure all those affected are aware and know how to apply for funding	0	0	0	1	3	1	0	0	5	1	0
Funding / support should be prioritised to upgrade to hybrid / electric vehicles	0	0	0	0	0	0	1	0	12	2	1
Funds / support should be prioritised for voluntary / community organisations / charities / services	0	0	2	0	0	0	0	0	3	0	0
Funds / support should be prioritised for older vehicles / most polluting / where change will have greatest impact	0	0	0	0	1	0	0	0	3	0	1
All those that operate / travel in Greater Manchester and will be affected should be eligible for funding / support	0	0	0	3	6	3	1	1	5	1	0
Other	0	0	4	8	17	4	2	5	34	4	3
Base	**9**	**12**	**21**	**63**	**228**	**48**	**87**	**72**	**810**	**66**	**113**

Why do you say this about a hardship fund?

	Bus	Coach	Minibus	Leisure Vehicle	LGV	HGV	PHV	Hackney Carriage	Private car	Other vehicle	None
Funding should available to all those affected/fair to all (general comments)	0	1	2	5	19	4	3	2	85	11	14
Support the proposed funding/funding is important/needed - for affected individuals/businesses /organisations	12	9	12	59	133	25	38	42	675	58	125
Support the proposed funding/funding is important/needed - for me/my business/organisation to survive and continue	0	0	1	4	20	5	5	9	12	1	0
Oppose the hardship funding/it won't help those affected (e.g. will not help long-term)	0	0	0	4	8	6	1	1	45	1	4
Concerns/queries about where funding is coming from for this/transparency over funds	0	0	0	2	1	0	0	0	26	0	4
Concerns about the funding being mis-managed	0	0	1	1	5	3	0	2	35	3	5
Funding should not come in the form of a repayable loan/should be given as a lump sum grant	0	0	0	0	0	0	1	0	3	1	1
Funding should be provided as a repayable loan/not given as a grant	0	0	0	0	1	0	0	0	1	0	0
Funding is needed/important to ensure social equality	0	0	1	11	9	3	1	3	78	9	15
Don't agree with fund because don't agree with charges	0	0	0	0	4	0	1	0	17	1	0
Queries about the proposals/information not clear - general comments	0	0	0	5	7	3	1	1	13	0	2
Funding should be higher for vehicles/provide a higher amount to those affected	0	0	1	3	22	6	3	8	60	3	6
Funding amount is too high/too much funding	0	0	0	0	2	1	0	0	5	1	1
Funding should not be available/not needed – should have already upgraded by now/use own money	1	1	0	3	9	1	1	1	63	6	13
All those that operate/travel in Greater Manchester and will be affected should be eligible	0	0	0	2	3	0	0	0	11	1	1
Concerns about people claiming for funding when not needed/trying to commit fraud/abuse the scheme	0	0	0	1	5	3	0	1	76	5	2
Funding should go to those who need it most/should be means tested	0	0	0	0	4	1	0	2	31	4	4
Should be financial support/reimbursement for those who have already recently upgraded their vehicle/s	0	0	0	0	0	0	1	1	2	0	0
Funding should only be provided to upgrade to hybrid/electric vehicles	0	0	0	0	0	0	0	0	1	0	2

	Bus	Coach	Minibus	Leisure Vehicle	LGV	HGV	PHV	Hackney Carriage	Private car	Other vehicle	None
Funding payments should only be paid after new equipment/vehicles have been invested in	0	0	0	0	0	0	0	0	2	0	0
Needs to be well-advertised/promoted to ensure all those affected are aware and know how to apply for funding	0	0	0	1	1	0	0	0	9	0	2
Funds should be prioritised for sole traders/small businesses/small organisations	2	2	1	4	12	2	0	0	52	9	10
Funds should be prioritised for voluntary/community organisations/charities/services	1	0	0	0	5	0	0	0	15	1	4
Other	1	1	1	2	5	1	3	2	32	1	8
Base	**14**	**11**	**17**	**92**	**237**	**55**	**54**	**63**	**1128**	**104**	**187**

If you are impacted by the proposed clean air zone daily charges, is there any additional support that you would need?

	Bus	Coach	Minibus	Leisure Vehicle	LGV	HGV	PHV	Hackney Carriage	Private car	Other vehicle	None
No additional support needed/funding and financial support offered is good/fair/appropriate	2	1	1	4	15	3	1	1	12	2	0
Queries about the proposals/information not clear - general comments	0	0	1	1	5	2	1	1	1	2	0
More time needed to allow electric vehicle technology for small goods vehicles to become widely available and cheaper	0	0	0	1	5	1	0	0	11	0	2
More time needed to adapt to the proposals	1	2	0	4	10	6	1	3	11	2	1
Support/counselling should be provided to those whose mental health will be impacted by the proposals	0	0	0	2	8	0	0	0	7	1	0
Should be discounted charges for those who travel within the boundary frequently/those who pay in advance	0	0	1	1	5	2	4	0	5	1	1
Funding should available to all vehicle types/fair to all	0	0	0	2	1	0	2	0	4	0	0
Financial support needed to be able to pay daily charges	0	0	0	3	13	3	1	2	13	2	3
Should be financial support for those relocating outside of Greater Manchester due to the proposals	0	0	0	1	1	0	0	0	1	0	0
Concerns/queries about where funding is coming from for this/transparency over funds	0	0	0	0	1	1	0	0	6	1	2
Funding/financial support should not be available/not needed – should have already upgraded by now/use own money	0	0	0	0	1	0	0	0	1	0	0
More financial support/funding needed to upgrade vehicle/s	1	1	2	28	78	19	24	24	85	15	6
Should be given 100% of total cost/given a compliant vehicle for free	0	0	1	19	36	6	7	4	35	10	0
Should be more financial support/incentives to upgrade to electric/hybrid vehicles	0	0	0	0	3	0	0	1	23	4	6
Funding/financial support should be provided for other costs - insurance, maintenance, other fees etc	1	1	0	0	2	0	1	0	1	0	0
More funding/financial support needed for - sole traders/smaller companies/organisations	0	0	0	0	12	2	0	0	21	4	2
More funding/financial support needed for - voluntary/community organisations/charities/services	0	0	1	1	3	0	0	0	5	0	0
All those affected by the proposals should be eligible for funding/financial support	3	3	1	5	13	6	0	0	18	2	1

	Bus	Coach	Minibus	Leisure Vehicle	LGV	HGV	PHV	Hackney Carriage	Private car	Other vehicle	None
Needs to be well-advertised/promoted to ensure all those affected are aware and know how to apply for funding/financial	0	0	1	0	1	0	1	0	5	0	0
Concerns about people claiming for funding when not needed/trying to commit fraud/abuse the scheme	0	0	0	0	0	0	0	0	0	0	1
Funding should go to those who need it most/should be means tested	1	1	1	1	9	5	3	3	34	3	8
Concerns about performance/availability of electric vehicles	0	0	0	0	6	1	0	2	15	1	0
Concerns about availability of electric charging infrastructure/need more charging points	0	0	1	1	10	1	1	3	66	3	8
Other	0	1	1	7	30	10	1	12	28	6	1
Base	**7**	**8**	**10**	**72**	**219**	**55**	**43**	**45**	**347**	**49**	**37**

Do you have any other comments on the proposals for the Clean Air Plan as set out in the consultation document?

	Bus	Coach	Minibus	Leisure Vehicle	LGV	HGV	PHV	Hackney Carriage	Private car	Other vehicle	None
Oppose the proposals (general comments)	7	6	9	68	210	36	55	40	612	61	47
Air quality / pollution is not an issue in Greater Manchester / proposals not needed	3	0	2	9	35	5	9	26	96	7	5
Should be a vote on the proposals	0	0	2	1	16	3	1	0	34	7	2
There are more important areas to be spending the money on	1	0	1	9	19	4	1	4	118	11	14
Proposals are a stealth tax / congestion charge/money-making scheme / financial scam	7	4	8	55	169	30	24	39	577	45	44
Queries about the proposals / information not clear - general comments	0	0	0	1	4	0	1	1	21	2	6
Support the proposals (general comments)	4	2	3	14	26	9	11	2	261	21	73
Proposals should go further (general comments)	4	1	2	2	16	5	3	1	194	13	65
Use the revenue from charges to improve GM / manage back into the economy	0	0	0	0	4	1	1	0	52	3	8
Should be more involvement from those impacted in developing the proposals	1	2	1	4	6	5	1	1	21	2	6
Impact / success of the proposals should be monitored	0	0	0	0	3	2	0	0	29	3	7
Proposals need to be promoted / communicated effectively	0	0	1	3	8	4	3	0	45	6	14
Need other initiatives/measures to improve air quality / environmental impact	2	0	5	22	48	6	5	1	260	18	36
Need better road infrastructure / design / capacity to reduce congestion / improve air quality	2	0	1	9	40	12	6	5	202	18	14
Should be a scrappage scheme for non-compliant vehicles	2	2	2	0	9	3	0	1	38	4	1
Air quality is still an issue from other pollutants	0	1	1	4	9	3	1	0	38	3	4
Put tax / charge on petrol	0	0	0	0	1	0	0	0	2	0	0
More information needed on pollutant reduction	0	0	0	0	0	0	0	0	0	0	0
Delay the proposals / implement at a later date	1	1	2	11	42	14	11	22	131	7	11
Implement the proposals sooner / as soon as possible	0	0	1	0	8	1	2	0	124	8	27
Should include private cars / motorbikes / mopeds / motorhomes in the proposals	9	6	6	10	52	11	17	12	299	27	76
Concern about privately owned vehicles being included in the near future	0	0	1	8	20	1	0	4	145	4	5

	Bus	Coach	Minibus	Leisure Vehicle	LGV	HGV	PHV	Hackney Carriage	Private car	Other vehicle	None
Should accept lower standards for vehicles to be compliant	2	4	1	5	19	9	3	3	24	1	0
Businesses in less polluting areas should not be charged for using vehicles	0	0	0	0	0	0	0	0	1	0	0
Restrict / discourage vehicle use (general comments)	0	0	2	1	6	2	2	1	78	10	29
Should pedestrianise / ban cars from the city centre / introduce a congestion charge	0	0	0	4	8	2	5	3	70	6	24
Vehicles should be charged / penalised for idling	1	1	2	2	6	2	1	0	55	4	13
Target / charge school runs	0	0	0	7	8	2	0	0	42	4	6
Older/most polluting vehicles should be targeted / replaced	3	2	1	4	18	3	5	4	111	9	8
Older vehicles /t hose already due to be upgraded should receive less funding / financial support	2	0	0	1	1	0	1	1	21	2	2
Too many taxis (Hackney and PHV) on the road already / need to reduce the amount of them	0	0	0	2	4	2	0	2	41	2	5
All taxis (Hackney and PHV) should be cleaner / greener (e.g. electric, hybrid, hydrogen)	1	1	0	0	7	0	0	0	35	0	6
Should promote / encourage more use of active travel (general comments)	0	0	1	1	1	0	0	0	21	5	6
Should promote / encourage more use of buses / public transport (general comments)	2	1	1	6	10	1	1	0	84	7	19
Should be higher standards for vehicles to be compliant	0	0	0	1	14	2	1	0	117	9	18
Encourage vehicle sharing	0	0	1	3	8	2	1	1	42	6	6
Improve public transport	3	3	5	18	63	6	5	4	411	38	82
Improve active travel	0	0	1	4	12	1	1	0	107	13	28
Improve cycling	0	0	1	3	12	1	1	0	92	10	24
Other	1	1	1	6	16	5	2	3	94	6	16
Base	**27**	**17**	**24**	**144**	**402**	**91**	**92**	**90**	**1852**	**162**	**291**

Taking in to account both the Clean Air Zone and the support offered, what would be the likely impact on you / your business / your organisation?

	Bus	Coach	Minibus	Leisure Vehicle	LGV	HGV	PHV	Hackney Carriage	Private car	Other vehicle	None
Will have a large/significant impact on me/my business/organisation	0	1	0	7	11	6	8	7	25	3	1
Will have a positive impact on me/my business/organisation	0	0	0	0	0	0	0	0	1	0	0
Will have a negative impact on me/my business/organisation	1	2	1	8	32	4	19	7	48	8	3
Will negatively impact mental health/wellbeing (e.g. stress)	0	0	1	28	15	4	2	3	39	4	5
Queries about the proposals/information not clear - general comments	0	0	1	0	12	3	2	1	9	2	1
Concerned about impact on bus/public transport routes/frequency	2	0	2	1	3	0	0	1	18	2	8
Will improve/encourage active travel/public transport use	0	0	0	0	0	0	0	0	7	2	0
Will cause more congestion/encourage more private car use	3	1	3	5	15	1	2	0	77	8	16
Won't improve air pollution/quality	3	3	4	28	77	6	12	11	295	25	45
Support the proposals/scheme and efforts to improve air pollution/encourage behaviour change/reduce congestion	2	1	5	2	19	2	8	3	372	30	124
Will need to replace vehicle/s	1	2	1	7	27	15	4	0	29	5	2
Will need to replace vehicle/s and am prepared to do this	0	0	1	0	8	5	0	0	11	1	2
Will devalue my vehicle/s/will have to sell vehicle/s	1	2	1	22	45	7	1	6	46	5	1
Concerned that the price of compliant vehicles will increase because of the proposals	1	1	1	1	23	3	5	6	25	2	4
Cannot afford to upgrade my vehicle/s	3	5	11	48	147	33	53	51	203	22	10
Unfair to those who have recently bought a vehicle/s/not yet due for upgrade	1	0	0	3	14	4	3	10	18	1	1
Will add costs/negatively impact use of personal leisure vehicle/s/hobbies/clubs/ events	3	1	3	177	86	11	1	1	159	43	3
Concern about goods/services/fares increasing in price for people	14	7	10	38	104	17	18	6	663	45	80
Will impact me financially/add more costs to my life/activities	1	1	4	76	127	14	14	14	173	28	10
Will have a significant/detrimental impact on me financially (e.g. cause bankruptcy, homelessness)	0	0	1	7	51	6	9	25	50	5	2

	Bus	Coach	Minibus	Leisure Vehicle	LGV	HGV	PHV	Hackney Carriage	Private car	Other vehicle	None
Unfair impact to those located just outside of Greater Manchester/who don't qualify for funding	1	0	1	1	5	2	1	0	8	1	0
Will increase my business prices to cover costs/charges	5	7	4	1	46	15	5	4	46	9	1
Will negatively impact businesses/trade/economy in Greater Manchester	8	8	11	102	172	35	40	36	495	43	32
Will negatively impact my business/operations/performance	11	11	8	26	187	61	62	47	208	25	15
Will cause me to close my business/lose my job/some will go out of business	4	6	4	32	146	44	36	45	182	17	7
No or small impact	0	1	1	6	19	3	12	8	367	26	53
Will reduce travel into and within GM	0	1	0	25	12	3	0	0	53	5	1
Will cause relocation	1	0	3	9	41	8	0	0	61	8	3
Other	1	0	2	5	11	4	6	5	53	5	9
Total	**29**	**22**	**31**	**227**	**502**	**118**	**129**	**112**	**1839**	**170**	**261**

Please use this space to tell us about how the Covid-19 pandemic has affected your ability to meet the proposals outlined within the consultation document:

	Bus	Coach	Minibus	Leisure Vehicle	LGV	HGV	PHV	Hackney Carriage	Private car	Other vehicle	None
No impact on my business / businesses	3	2	3	1	15	5	2	4	19	2	2
Increased financial pressures / income has fallen as a result of Covid-19 (general)	11	14	12	35	161	46	65	65	330	20	47
Proposals are unfair as businesses are already struggling due to Covid-19 (general)	1	3	4	22	68	17	20	33	232	13	25
Debt has increased / cannot afford more debt due to Covid-19	1	4	3	4	23	4	11	9	21	1	2
Savings / reserves have been used up / almost exhausted	0	1	0	0	17	7	6	5	19	3	4
Business may close / cease to operate due to Covid-19	1	2	1	5	18	2	5	15	34	0	4
Business is not eligible for financial support being offered by Government to cope with Covid-19	0	0	0	2	8	3	4	6	13	2	1
Brexit is causing issues / uncertainty about business performance	2	3	0	1	10	2	3	1	29	3	6
Cannot afford to upgrade my vehicle/s due to Covid-19	2	9	7	9	54	18	24	20	69	6	1
Staff job losses due to Covid-19	1	3	2	1	11	5	0	0	12	3	0
No impact on me / individuals / people	0	0	0	9	7	3	1	0	58	7	8
Increased financial pressures / costs for me / individuals / people as a result of Covid-19 (general)	0	0	5	34	48	9	17	21	218	20	23
Covid-19 has made it more difficult to use buses / public transport (e.g. reduced services / frequency / routes)	1	1	1	0	2	0	0	0	10	1	0
Covid-19 has / will increase prices of goods / services / fares	0	0	0	0	0	0	0	0	2	0	1
Covid-19 is having a negative impact on those who are poorer / lower income households	0	0	0	1	2	0	0	0	7	1	0
Concerns about losing my job due to Covid-19	0	0	0	0	0	0	0	0	1	0	0
Covid-19 pandemic is temporary / should not affect / delay proposals	0	0	0	2	7	0	0	0	137	9	38
The need for the proposals should be reviewed due to the improvement in air quality as a result of the Covid-19 lockdowns	4	2	1	11	30	7	4	11	106	10	10

	Bus	Coach	Minibus	Leisure Vehicle	LGV	HGV	PHV	Hackney Carriage	Private car	Other vehicle	None
Covid-19 has highlighted the need / opportunity to reduce pollution / improve air quality	0	0	0	2	3	0	1	0	104	7	28
Concerns about the availability / accessibility of funding / financial support for proposals as a result of Covid-19	0	0	0	0	0	0	1	0	23	0	10
Impact of Covid-19 needs to be considered when setting eligibility criteria for funding / financial support	1	1	1	3	2	1	1	0	30	1	5
Buses / public transport is being used less due to Covid-19 / other forms of transport are important / needed for safety	0	0	1	4	8	0	1	1	59	6	10
Covid-19 highlighted the need for better / upgraded vehicles (general)	0	0	0	0	0	0	0	0	1	0	0
More people will / continue to work from home and reduce air pollution as a result of Covid-19 / change in practices	0	0	0	3	7	2	1	0	23	3	6
Other	2	2	3	13	21	8	6	9	136	12	24
Proposals should be delayed until after the Covid-19 pandemic has passed	3	2	8	19	43	10	9	16	200	16	14
Base	**18**	**18**	**25**	**110**	**305**	**78**	**94**	**95**	**1156**	**94**	**172**

Please use this space to provide any comments on the draft Equality Impact Assessment:

	Bus	Coach	Minibus	Leisure Vehicle	LGV	HGV	PHV	Hackney Carriage	Private car	Other vehicle	None
Support / agree with the Equality Impact Assessment - it is fair / appropriate (general)	0	0	0	0	1	0	0	0	21	0	7
Oppose/disagree with the Equality Impact Assessment - it is unfair / not enough	0	0	1	0	10	2	0	5	23	1	1
Should be no protected characteristics / everyone should be treated equally	1	0	1	1	3	1	1	0	27	2	5
Equality Impact Assessment will not make any difference / does not matter	0	1	0	0	4	1	0	0	22	1	2
Should be more consultation / engagement with those affected about the impact and who should be considered	1	0	1	0	4	0	0	1	6	0	2
Feel that more consideration should be given to the impact on community groups (e.g. equine community)	0	0	0	3	0	1	0	0	3	0	0
Support / agree that it is a protected characteristic - sexual orientation	0	0	0	0	0	0	0	0	0	0	0
Should not be a protected characteristic - sexual orientation	0	0	0	0	2	1	0	0	4	0	0
Queries about the proposals / information not clear - general comments	0	0	0	0	0	0	0	0	0	0	0
Queries about the proposals / information not clear - EQIA	0	0	1	0	3	0	1	1	15	2	5
Proposals will have a positive impact on – children / young people	0	0	0	0	0	0	0	0	3	1	1
Proposals will have a negative impact on / should be more consideration for – children / young people	1	1	0	0	1	0	0	0	4	0	3
Proposals will have a positive impact on - older people	0	0	0	0	0	0	0	0	1	0	1
Proposals will have a negative impact on / should be more consideration for - older people	0	0	0	0	0	0	2	0	4	0	1
Concern about the impact on transport options for older people (e.g. that the proposals will cause isolation)	1	1	1	2	2	0	0	2	6	1	2
Proposals will have a positive impact on – men / males	0	0	0	0	0	0	0	0	3	0	3
Proposals will have a negative impact on / should be more consideration for – men / males	0	0	0	0	0	0	1	0	6	0	1
Proposals will have a positive impact on – women / females	0	0	0	0	0	0	0	0	0	0	0
Proposals will have a negative impact on / should be more consideration for – women / females	0	0	0	0	0	0	0	0	2	1	0

	Bus	Coach	Minibus	Leisure Vehicle	LGV	HGV	PHV	Hackney Carriage	Private car	Other vehicle	None
Proposals will have a positive impact on – disabled / vulnerable people/those with health issues	0	0	0	1	0	0	0	0	7	1	0
Proposals will have a negative impact on / should be more consideration for - disabled people	0	0	0	3	5	0	0	2	18	2	3
Proposals will have a negative impact on / should be more consideration for - those with health issues	0	0	1	0	2	0	0	0	1	0	4
Concern about the impact on transport options for disabled (e.g. that the proposals will cause isolation)	2	2	2	3	8	0	1	5	29	5	5
Concern that not all disabilities / health issues will be considered	1	1	0	1	1	0	0	0	10	1	2
Proposals will have a positive impact on – pregnancy / maternity	0	0	0	0	0	0	0	0	0	0	0
Proposals will have a negative impact on / should be more consideration for – pregnancy / maternity	0	0	0	0	0	0	0	0	0	0	0
Proposals will have a positive impact on - certain ethnic / religious groups	0	0	0	0	0	0	0	0	0	0	0
Proposals will have a negative impact on / should be more consideration for - certain ethnic / religious groups	0	0	0	0	0	0	1	6	9	0	3
Concerns that funding / financial support will not be available / suitable to certain ethnic / religious groups	0	0	0	0	0	0	0	0	5	1	1
Proposals will have a positive impact on – poorest / lowest income households / people	0	0	0	0	0	0	0	0	1	0	1
Proposals will have a negative impact on / should be more consideration for – poorest / lowest income households / people	1	0	2	14	28	0	6	7	98	6	20
Support age and gender	0	0	0	0	1	0	0	0	2	0	2
Support disability and pregnant	0	0	0	0	3	0	0	0	7	1	3
Support ethnicity and religion	0	0	0	0	0	0	0	0	3	0	1
Do not support age and gender	0	0	0	0	1	0	0	0	2	0	0
Do not support disability and pregnant	0	0	0	0	0	0	0	0	0	0	0
Do not support ethnicity and religion	0	0	0	0	1	0	0	0	3	0	0
Other	0	0	0	0	4	0	0	0	13	2	3
Base	**5**	**3**	**7**	**22**	**66**	**6**	**12**	**18**	**280**	**21**	**51**

Greater Manchester's Clean Air Plan to Tackle Nitrogen Dioxide Exceedances at the Roadside

Response to Consultation

Warning: Printed copies of this document are uncontrolled

Version Status:	DRAFT FOR APPROVAL	**Prepared by:**	Transport for Greater Manchester on behalf of the 10 Local Authorities of Greater Manchester
Date:	20 June 2021		

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DRAFT FOR APPROVAL

1 Executive Summary

1.1 This report sets out the GM Authorities' response to the GM Clean Air Plan consultation feedback, as outlined in the AECOM Consultation Report[1]. It also considers the further analysis that has been undertaken, looking at the impact of COVID-19, the economic impacts of the GM Clean Air Plan and further assessments of the Equality Impacts analysis.

1.2 The consultation took place between 8 October to 3 December 2020. It was seeking feedback on the key characteristics of the GM Clean Air Zone (CAZ), including: the boundary, the times of operation, the vehicles affected, the exemptions, the discounts, the daily charges and the penalty for non/late payment of the CAZ charge. It also sought feedback on the funds to support businesses and individuals upgrade and the management of those funds. It also asked for feedback on the **"**try before you buy**"** Hackney Carriage scheme, the electric vehicle charging infrastructure for hackney carriages and private hire vehicles and the proposed Hardship fund. Finally, views were sought on the impact the GM Clean Air plan would have on air quality and on individuals and businesses. There were also questions around the pandemic, and the impact this had had on businesses. This was all set out in a Consultation Summary document.[2]

1.3 This report addresses the feedback raised in respect of each element of the proposals presented at consultationand provides a response. The report sets out whether the GM policy position outlined in the consultation document has changed.

1.4 Any policy revisions outlined in this report have considered the consultation responses as well as the research findings from the Impact of COVID-19 report and the Economic Implications report[3].

1.5 There were a number of key themes that came out of the consultation. These include:

1.6 Feedback on the GM Clean Air Zone:

- There was some support for the boundary, with some commenting that the area should be increased and include the Strategic Road Network (SRN). Others commented that the area was too large, that the zone should be limited to the city centre. There were also concerns from neighbouring local authorities on the impact on their businesses and routes.
- Over half of the public and representatives who provided a comment on the hours of operation were generally supportive, whereas two thirds of

[1] This can be found in Appendix 2 of the June 2021 GMCA report.
[2] https://images.ctfassets.net/tlpgbvy1k6h2/38mpTrGAw7qtuneFVln93c/c919fd3e08d54ec1f17e114a3b014093/20-0565_CAP_Consultation_Summary_WEB.pdf
[3] These reports can be found in the June 2021 GMCA report, Appendix 5 – Impact of COVID-19 report and Appendix 7 the Economic Implications Report.

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businesses suggested amendments to the operation time including using peak and off-peak charging.

- Views on the proposed daily charge varied; businesses felt charges for all vehicles are too much and the public felt the charges are about right or too little. This was across all vehicle types.
- For the permanent and temporary local exemptions and the permanent local discounts, there was support from both the public and businesses. There were, however, some concerns from the public about continuing to have polluting vehicles on the road. But there were also comments raised around further discounts and exemptions that were deemed necessary to support GM's economy and recovery from COVID-19.

1.7 Feedback on the Funding to upgrade non-compliant vehicles:

- There was high level of support for the funds amongst all respondent types and many felt it was needed in order to help businesses upgrade.
- However, there were concerns about the funds and their management.
- Many comments received stated that the proposed amounts to support each vehicle type were not enough. There were also some concerns about those who are not in GM not being eligible for the funds.
- There were some concerns raised about potential mismanagement of the funds and people taking advantage of the scheme.
- Some respondents, who thought they had non-compliant vehicles and would be impacted by the CAZ, were unsure whether they would be eligible for funding.

1.8 Feedback on the other supporting measures

- For the "Try Before You Buy" initiative for GM-licensed hackney drivers, there was both support and concerns. Supportive comments mentioned that it will support vehicle owners to overcome anxieties surrounding electric vehicle technology and encourage more drivers to convert to electric. Others commented that it could be extended to other vehicles such as PHV and LGVs. But there were also concerns about how it would work, vehicle performance and charging infrastructure.
- There was support for the Hardship fund from members of the public, businesses and representatives.
- There was a polarised view of the proposed finance offer; a third of comments were supportive stating it was vital to helping businesses upgrade to compliant vehicles. However, a third of comments were negative, raising concerns it could lead to increased debt for those receiving loans, putting increased pressure on businesses.

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1.9 Feedback on the impact of COVID-19

- 76% of businesses and 79% of taxis (by which we mean Hackney carriages and private hire vehicles (PHVs)) stated they had been financially impacted by COVID-19. This included increased levels of debt, reduced savings and lower turnover. Many stated any savings had been used and felt their credit rating had decreased. There were comments asking for the proposals to be delayed and that COVID-19 had led to improvements in air quality, so the CAZ may not be required

1.10 Feedback on the importance of air quality and confidence that the GM Clean Air Plan will bring down levels of NO2

- Members of the public and representatives mainly agreed there is a need to improve air quality in Greater Manchester, fewer businesses did. Some felt the proposals did not go far enough but others felt there were other much larger contributors to air pollution than traffic.

1.11 This table sets out policy at consultation and the proposed final policy position.

Key characteristics	Policy at consultation	Proposed Final Plan Policy
Launch date	Spring 2022	30 May 2022[4]
Boundary	Boundary coincided with the GM administrative boundary	No change but propose to include the A575 and A580 at Worsley subject to consultation.
Timings	24 hours a day, 7 days a week, all year	No proposed changes.
Charging day	Midnight to midnight	No proposed changes.
Vehicles affected and daily charges	Bus £60 Heavy Goods Vehicle (HGV) £60 Coach £60 Light Goods Vehicle (LGV) £10 Minibus £10 Hackney Carriage £7.50 Private Hire £7.50	No proposed changes to the charges. Propose that M1 motorhomes are subject to further consultation to be included in charging CAZ for parity between vehicles of the same type.

[4] Subject to joint GM and JAQU agreement on overall 'readiness', including that the Central Charging Portal and national Vehicle Checker is' GM ready

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Key characteristics	Policy at consultation	Proposed Final Plan Policy
	Vehicle (PHV)	
Temporary exemptions	LGVs and minibuses GM-registered coaches GM-licensed Wheelchair accessible Hackney carriages and PHVs Outstanding finance / limited supply All temporary exemptions ended 31 December 2022	All LGVs, coaches and minibuses. All GM-licensed Hackney carriages and PHVs. Outstanding finance/ limited supply Above temporary exemptions to end 31 May 2023 (A year after CAZ launch) Buses used on a GM school bus service tendered prior to March 2019 exempt to end July 2022[5]
Permanent discounts	GM licensed PHVs – 5/7 discount Leisure vehicles (>3.5t) in private ownership registered to an address in GM eligible to apply for a discounted charge of £10 per day	PHV discount replaced with temporary exemption as more appropriate means of support All vehicles classified under the Private HGV tax class to be eligible for a discounted charge of £10 per day.
Permanent national exemptions	Historic vehicles Military vehicles Specialist emergency services vehicles Disabled tax class vehicles	No proposed changes.
Permanent local exemptions	Showman's Guild vehicles Disabled passenger vehicles Specialist HGVs Non-road-going vehicles Vehicles used by emergency services Community minibuses Driving within the zone because of a road diversion	All previous local exemptions remain. Additional exemptions: LGVs and Minibuses specially adapted for use by a disabled user Heritage buses not used for hire and reward Driver training buses

[5] Where contract tendered prior to March 2019 and where contract end date is end July 2022. Buses exempted will not be eligible for upgrade funding.

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1.12 The following table sets out the dates from when non-compliant vehicles would be charged to drive into and within the Clean Air Zone and the proposed funding available for each vehicle type. Where there are changes, from the policy at consultation they have been highlighted in green.

Vehicle type	Daily Charge	Date charged introduced	Replacement Funding	Retrofit Funding
Bus	£60	30 May 2022[6] (Same as at consultation)	£16k (Same as at consultation)	£16k (Same as at consultation)
HGV	£60	30 May[7] 2022 (Same as at consultation)	Up to £12k (Previously up to £5.5k)	£16k (Same as at consultation)
Coach	£60	All coaches - end May 2023 (Previously only GM-registered)	£32k (Previously £16k)	£16k (Same as at consultation)
Van	£10	End May 2023 (Previously 31 Dec 2022)	Up to £4.5k (Previously £3.5k)	New £5k (No option at consultation)
Minibus	£10	End May 2023 (Previously 31 Dec 2022)	£5k (Same as at consultation)	New £5k (No option at consultation)
Hackney carriage	£7.50	End May 2023 GM-licensed (Previously 31 Dec 2022 for WAV only)	Up to £10k More options for replacement available inc. Euro 6 (Fewer options at consultation)	£5k Diesel option available (Previously LPG only)
PHV	£7.50	End May 2023 GM-licensed (Previously 31 Dec 2022 for WAV only)	Up to £6k (Previously up to £5k)	New £5k (No option at consultation)

1.13 In the policy for consultation, the number of vehicles an owner could apply for was capped at 10 vehicles (with the exception of HGVs and hackney carriages). This will be reduced to 5 vehicles in order to ensure that funds are prioritised for the smallest businesses and operators.

1.14 Other changes to the GM policy position:

[6] Subject to joint GM and JAQU agreement on overall 'readiness', including that the Central Charging Portal and national Vehicle Checker is' GM read

[7] Subject to joint GM and JAQU agreement on overall 'readiness', including that the Central Charging Portal and national Vehicle Checker is' GM read

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1.15 Hardship fund: A proposed Hardship Fund is not included in the final GM Clean Air Plan. Although feedback from the consultation and the impact of COVID-19 research found that further support was required for GM businesses, Government Ministers do not agree that a Hardship Fund is the best way to mitigate the impact of uncertainty due to the pandemic. Ministers cite other COVID-response government schemes (not specific to Clean Air plans) being available to address wider business impacts.[8]

1.16 Taxi EV Charging Infrastructure: In the consultation it was proposed that EV charging infrastructure (EVCI) would be installed to support the taxi trade in GM. JAQU have offered £3m towards GM's ask of £6.5m, so as to assist in resourcing towards the planned provision of 40 charge points.

1.17 Try Before You Buy: In the consultation it was proposed that there would be a "Try Before You Buy" initiative for GM-licensed hackney carriage drivers to test electric vehicles. JAQU have offered £0.5m towards GM's ask of £1.69m. This is not sufficient funding to deliver the scheme. Therefore, alongside the changes to the timeline on delivering common vehicle standards through the GM Minimum Licensing Standards[9] and the wider options for vehicle upgrades for hackney carriages and private hire vehicles this funding is to be reallocated to provide an additional 6-8 charge points dedicated for use by taxis within the electric vehicle charging infrastructure (EVCI) programme.

1.18 The issues which have arisen through the consultation, the responses and outcomes are set out in chapters 7, 8 and 9 of this document. This table shows each issue and the outcome.

Section	Issue	Outcome
7.2	Comments on consultation materials	No change
7.3	General criticism of the ten GM Local Authorities, Mayor of GM, TfGM and Government	No change
7.4	Comparisons between the GM CAP proposals and other UK schemes	No change
7.5	Comparisons between the GM CAP and the London Ultra Low Emission Zone (ULEZ)	No change
7.6	Criticism that the updated consultation proposals did not address legal failings previously identified in earlier correspondence	No change
7.7	Criticism of failing to account for modelling uncertainties	No change
8.2	General feedback on the proposed Clean Air Zone	No change
8.3	The impact the GM Clean Air plan would have on air quality	No change
8.4	Support for the proposed GM Clean Air Plan	No change
8.5	The economic impacts on Greater Manchester	No change

[8] Further information is available in the GMCA report for the 25 June 2021 GMCA meeting

[9] The GM Minimum Licensing Standards are a proposed common set of standards for GM-licensed hackney carriages and private hires, they cover driver standards, vehicle standards, operator standards and local authority standards. Further information on the standards is available here: gmtaxistandards.com/minimum-licensing-standards

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8.6	The Clean Air Zone should include other pollutants and should include higher vehicle standards	No change
8.7	The Clean Air Zone should include private cars	No change
8.8	Alternatives to a Charging Clean Air Zone should be prioritised	No change
8.9	The proposals should be implemented earlier	No change
8.10	Pollution levels do not warrant the measures being taken	No change
8.11	Clean Air Zones are a money-making scheme/congestion charge	No change
8.12	Implementation of the Clean Air Zone should be delayed	No change
8.13	Clean Air Zone Boundary – the boundary is too large	No change
8.14	Clean Air Zone Boundary - certain roads/areas should be included or excluded from the zone	**Change**
8.15	Clean Air Zone Boundary – concerns about negative impacts of traffic redistributing at/near the boundary	No change
8.16	Clean Air Zone – Hours of operation – the CAZ should not operate 24 hours a day, 7 days a week	No change
8.17	Clean Air Zone – Hours of operation – midnight should not be the transition time between 24-hour periods	No change
8.18	Operation of the Clean Air Zone – practicalities of how the Clean Air Zone will work	No change
8.19	The charges in the CAZ should vary by time of day or should be higher in peak times	No change
8.20	The charges are too low, particularly for LGVs	No change
8.21	The daily charge should vary by emissions standards/size of vehicles	No change
8.22	The CAZ doesn't charge all vehicles, only those caught by a CAZ C that do not comply with the required emissions standards.	No change
8.23	Charge levels are too high	No change
8.24	The daily charge for buses is too high	No change
8.25	The daily charge for coaches is too high	No change
8.26	The daily charge for HGVs is too high	No change
8.27	The daily charge for HGV leisure vehicles is too high	**Change**
8.28	The daily charge for LGVs and minibuses is too high	No change
8.29	The daily charges for hackney carriages and private hire vehicles (PHVs) are too high	No change
8.30	Charges should apply to M1 vehicles with a body type of 'motorcaravan'.	**Change**
8.31	All exemptions/exemptions should be temporary or regularly reviewed	No change
8.32	Concerns around enforcement/abuse of permanent exemptions	No change
8.33	Private leisure vehicles should be permanently exempt	No change
8.34	Vehicles used by disabled users should be permanently exempt	**Change**
8.35	Buses should be permanently exempted from the CAZ	No change
8.36	Hackney carriages and PHVs should be permanently exempt	No change

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8.37	Other vehicles should be permanently exempt	**Change**
8.38	Disabled passenger vehicles should not be permanently exempt	No change
8.39	Other specific suggestions on vehicles that should not be permanently exempt	No change
8.40	Clean Air Zone – Changes to the temporary exemptions to the daily charge	No change
8.41	Changes to temporary exemptions	**Change**
8.42	Lead in time/availability/retrofit capacity resulting in delays of upgrades to compliant alternatives of over 12 weeks	**Change**
8.43	Temporary exemptions should be offered to those coach operators based outside GM but operating within it.	**Change**
8.44	Temporary exemptions should be offered to all GM licensed hackneys and private hire vehicles	**Change**
8.45	Temporary exemptions should be extended to other vehicles	No change
8.46	Opposition to the permanent discounts	No change
8.47	Concerns about enforcement and abuse of exemptions and discounts	No change
8.48	Discounts should be offered to: Leisure vehicles under 3.5t	No change
8.49	Discounts should be offered to: Hackney Carriages	No change
8.50	Discounts should be offered to: those based outside GM but operating within it.	**Change**
8.51	Discounts should be higher/offered more widely: other comments	No change
8.52	Oppose 5/7 discount offered to Private Hire Vehicles (PHVs)	**Change**
9.2	Should only offer grants and not vehicle finance / should only offer vehicle finance and not grants	No change
9.3	‘Fair’ access to funding	No change
9.4	Oppose funding the upgrade of non-compliant vehicles	No change
9.5	Concerns about affordability of upgrades and indebtedness and concern that vehicle finance would need to be at or close to 0% interest rate to be affordable	No change
9.6	Concerns about the management of vehicle funding	No change
9.7	Risk of fraudulent applications for funds	No change
9.8	Funding source for the financial support through GM CAP and the operating costs	No change
9.9	Funding should target the oldest and most polluting vehicles as a priority	No change
9.10	Funding should be means tested	No change
9.11	Funding should only be for voluntary sector and small businesses and funding should be prioritised for these groups	**Change**
9.12	Vehicles that operate in GM and will be affected should be eligible for funding support (including those beyond the boundary)	**Change**

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9.13	More funding for buses should be available	No change
9.14	Funding should only be available for smaller bus companies	**Change**
9.15	Funding should only be available for upgrade to EV/hybrid buses	No change
9.16	Buses operating on school bus contracts that are not compliant should be considered for a temporary exemption until the end of their contracts	**Change**
9.17	The eligibility criteria should not inadvertently exclude buses operating on school services	**Change**
9.18	Funding for HGVs should be higher/current funding amount won't help/ can't afford to upgrade	**Change**
9.19	Funding for leisure vehicles should be increased due to unaffordability of upgrade	**Change**
9.20	Funding for LGVs should be higher due to unaffordability to upgrade	**Change**
9.21	Funding for coaches should be higher due to unaffordability of upgrade	**Change**
9.22	Funding for minibuses should be higher due to unaffordability to upgrade	**Change**
9.23	Funding for Hackney Carriages should be higher due to affordability to upgrade	**Change**
9.24	Electric Hackney Carriages are not suitable, the infrastructure is not in place	**Change**
9.25	Support should be offered to those who have already upgraded	No change
9.26	Oppose first-come-first-served for the Clean Taxi Fund, should go to those who need it most	**Change**
9.27	Funding should be higher for PHVs due to unaffordability of upgrade	**Change**
9.28	Opposition to the Try-Before-You-Buy (TBYB) Hackney Carriage Scheme	**Change**
9.29	Taxi electric vehicle charging infrastructure (EVCI) – increase of infrastructure required in GM	No change
9.30	More funding is needed in the Hardship Fund	**Change**
9.31	General opposition to the Hardship fund	**Change**
9.32	General opposition to the Hardship fund – disagree with the daily charges/won't help those affected	**Change**
9.33	Concerns about abuse/management of the Hardship Fund	**Change**
9.34	Hardship funding should be prioritised for those who need it most/smaller businesses/voluntary sector etc.	**Change**

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2 Background

2.1 Government has instructed many local authorities across the UK to take quick action to reduce harmful Nitrogen Dioxide (NO_2) to within legal limit values in the "shortest possible time". In Greater Manchester, the 10 local authorities, the Greater Manchester Combined Authority (GMCA) and Transport for Greater Manchester (TfGM), collectively referred to as "Greater Manchester" or "GM", have worked together to develop a Clean Air Plan to tackle NO_2 Exceedances at the Roadside, referred to as the GM CAP.

2.2 On 16 March 2020 the Government issued a direction[10] to the 10 local authorities of Greater Manchester. The direction stated:

"3.1 The authorities must take steps to implement the local plan for NO_2 compliance for the areas for which they are responsible.

3.2 the authorities must ensure that the local plan for NO_2 compliance is implemented so that –

a) compliance with the legal limit value for nitrogen dioxide is achieved in the shortest possible time and by 2024 at the latest;

b) exposure to levels above the legal limit for nitrogen dioxide are reduced as quickly as possible."

The local plan for NO_2 compliance is:

"the detailed scheme (excluding any associated mitigation measures) which the authorities identified as part of [the UK Plan for tackling roadside nitrogen dioxide concentrations 2017] to deliver compliance with the legal limit value for nitrogen dioxide in the shortest possible time that was considered by the Secretary of State on 16 March 2020, the approved measured of which are summarised in Schedule 1"[11].

2.3 Schedule 1, Summary of local plan for NO_2 compliance measures, of the Direction is:

Measures description: Charging Clean Air Zone Class C with additional measures.

Deadlines: To be implemented as soon as possible and at least in time to bring forward compliance to 2024.

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[10] The full direction can be found here: https://democracy.manchester.gov.uk/documents/s18580/Appendix%202%20-%20Greater%20Manchester%20NO2%20Plan%20Direction.pdf

[11] Further details about the local plan at March 2020 are included in Appendix 9 of the June 2021 GMCA report

2.4 The core goal of the GM Clean Air Plan is to address the legal requirement to remove ALL concentrations of NO_2 in Greater Manchester that have been forecast to exceed the legal Limit Value (40 µg/m^3) identified through the target determination process[12] in the "shortest possible time" in line with Government guidance.

2.5 Throughout the development of the plan GM has considered a range of options to deliver such compliance, overseen by GM Local Authority officers, and to understand the type and scale of intervention needed to reduce NO_2 concentrations to within legal Limit Values in the "shortest possible time" across Greater Manchester.

3 Introduction

3.1 Between 8 October and 3 December 2020, a consultation on the GM Clean Air Plan was held[13] which included a statutory consultation on the proposed Clean Air Zone Charging Scheme. The consultation provided an opportunity for all those with an interest in the proposals to provide further feedback. During the consultation an extensive communications, marketing and engagement campaign encouraged members of the public, businesses and organisations to respond to the consultation.

3.2 The GM Authorities engagement activity used the CleanAirGM visual identity and was coordinated by TfGM at a Greater Manchester-wide level. Stakeholder engagement also took place.

3.3 Prior to the consultation, in 2019, a public conversation[14] was held on the proposals at the outline business case, with over 3,300 responses. At this stage individuals and businesses gave feedback on those proposals, which were subsequently updated for the statutory consultation.

3.4 All responses received during the consultation went to AECOM – the agency appointed by TfGM on behalf of the ten Local Authorities to categorise, code and analyse the responses. AECOM have reviewed and summarised all responses received during the consultation period. This process, and the analysis from it, are summarised in the AECOM "Clean Air Plan Consultation" report[15].

3.5 This document considers the consultation responses alongside other information including the impact of COVID-19 research. The document provides a summary issue of the feedback for each area of the package, any additional relevant information and explains the GM response and is the outcome for the proposed final GM policy position.

[12] The Target determination process used modelling to show that illegal levels of NO2 will span all GM local authorities in 2021 if no action is taken. The extent of the air quality problem was agreed with Government.

13 The consultation did not seek a view on whether to make a scheme as that has been mandated by the Secretary of State. The GM Policy set out a position for consultation on the daily charge, discounts and exemptions of a Category C GM Clean Air Zone, and the proposals for the supporting funds.

[14] The information provided at the conversation, as well as the summary of responses can be found here: cleanairgm.com/technical-documents

[15] The AECOM GM Clean Air Plan Consultation report ispublished on cleanairgm.com

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3.6 The policy put forward at consultation can be found at cleanairgm.com/technical-documents

3.7 **Stakeholder responses**

3.8 **Hackney Carriage and Private Hire Vehicle representations**

3.8.1 Representations were made from 343 hackney carriage and PHV drivers and operators, as well as from several representative bodies. The representations covered many personal circumstances around the changes to income seen during the pandemic. There were also views suggesting that:

- The Clean Air Zone should include private cars
- Pollution levels do not warrant the measures being taken
- Clean Air Zone boundary is too large
- The hours of operation for the Clean Air Zone running from midnight to midnight should not be the transition time between 24-hour periods
- Hackney carriages and PHVs should be permanently exempt
- Disabled passenger vehicles should not be permanently exempt
- Discounts should be offered to hackney carriages
- Only grants should be available
- Oppose funding the upgrade of non-compliant vehicles (specifically buses and non-WAV taxi/PHV)
- Concerns about affordability of upgrades and indebtedness and concern that vehicle finance would need to be at or close to 0% interest rate to be affordable
- More support required for smaller businesses
- Funding for minibuses should be higher due to unaffordability of upgrade
- Funding being offered to upgrade to ZEC is not enough
- EV infrastructure – not enough to support the trade
- Funding should be higher for hackney carriages and PHVs due to unaffordability of upgrade
- Opposition to the Try-Before-You-Buy (TBYB) Hackney Carriage Scheme
- More funding is needed in the Hardship Fund.

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3.9 **Environmental campaigners**

3.9.1 During the consultation there were two environmentally focussed campaigns, where emails were sent to elected members and directly to the consultation email account. One of the campaigns, which included 172 emails, referred to as the Environmental Bill Lobby group in the AECOM report[16]) asked for a more ambitious clean air zone including for all polluting vehicles stating that it was unclear how the proposed zone will lower pollution as quickly as possible, given it does not include restrictions on private vehicles.

3.9.2 The campaigners also asked for an earlier timeline for delivery and action, asking for compliance before 2024, as well as greater incentives for walking and cycling, as well as for cleaner vehicles and public transport. They endorsed the funding to support those with non-compliant vehicles to upgrade, however they asked for more incentives around providing alternatives to car use, such as car clubs and e-bike schemes. The campaign also asked for a commitment to reach WHO levels for particulate matter (PM2.5) by 2030 and targeted action to reduce pollution outside schools, hospitals, and care homes to protect those most at risk.

3.9.3 There was a second environmental campaign of 484 emails (referred to as the CAZ Campaign group in the AECOM report[17]) to members and the consultation. This focussed on three points asking for:

- charge levels to be set at levels that achieve real changes in the way people travel;
- an ultra-low emission zone (ULEZ) to be introduced in Manchester City Centre which includes all polluting vehicles; and
- the government to provide financial support to help those individuals and businesses who need to change to cleaner vehicles.

3.10 **National Friends of the Earth and Manchester Friends of the Earth**

3.10.1 These two representations supported the principle and implementation as soon as practically possible of a CAZ. They supported the proposed boundary and hours of operation, and the proposals for funding. But they considered that to meet the requirement to ensure legal limits on NO2 are met in the shortest time possible required the creation of a CAZ Category D, because diesel cars are the big problem for roadside illegal NO2 levels. The option of a ULEZ/CAZ D for the city centre and Inner Ring Road would improve air quality in the city centre and benefit wider areas. They also considered that the CAZ proposals need to be set in the context of a wider sustainable transport strategy.

3.11 **ClientEarth**

[16] Supplied as Appendix 3 in the June 2021 GMCA report
[17] Supplied as Appendix 3 in the June 2021 GMCA report

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3.11.1 ClientEarth provided a full written response to the GMCAP Consultation. On a number of key points it supported the proposals in the consultation. In particular there was support for the boundary, the hours of operation and signage, financial support for bus upgrades and the Clean Commercial Vehicle Fund, hackneys, private hire and a hardship fund.

3.11.2 However, for a number of reasons (summarised below) ClientEarth considered that the consultation proposals 'did not go far enough to reduce illegal levels of pollution across Greater Manchester with the urgency required by law':

3.11.3 Failure to favour the most effective options – including tackling pollution from private cars:

3.11.4 ClientEarth stated that the Councils' CAZ proposal would do nothing to tackle pollution from private cars. ClientEarth considered that cars are the biggest contributor to illegal levels of pollution across Greater Manchester and made reference to the GM council's own analysis which showed that cars account for 45% of road based NOx emissions across the region.

3.11.5 ClientEarth asserted that a class D CAZ, which includes private cars, would be likely lead to quicker reductions in NO2 pollution than the class C CAZ option put forward for consultation. It also considered that an inner ring road class D CAZ, delivered alongside the wider regional class C CAZ proposals, could accelerate pollution reductions, bringing benefits in the early years (with reductions in the number of sites in exceedance in 2021) and also deliver greater certainty that compliance will be achieved across the region by 2024, by reducing the number of points modelled to be below the limit value but within the margin of error of the Councils' model.

3.11.6 By excluding this class D CAZ option from their proposals, ClientEarth considered that the GM councils had applied a flawed interpretation of the case law regarding the legal requirements the councils' plan must satisfy. Both the target date for compliance and the route to that target which reduces exposure as quickly as possible must be treated as primary determining factors when identifying and prioritising measures for inclusion.

3.11.7 Failure to account for modelling uncertainties:

3.11.8 ClientEarth considered that the GM CAP proposals failed to account for modelling uncertainty in a way that ensured that those proposals were "likely" to deliver compliance with legal limit values in the shortest possible time, in line with the relevant legal tests. ClientEarth raised concerns that forecasts of improvements in air quality have been shown to be overly optimistic in the past. ClientEarth also raised the point that the calculated Root Mean Square Error values are relatively high suggesting a high degree of error in the air quality projections.

3.11.9 CAZ Charges for vans (£10) are too little:

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3.11.10 ClientEarth considered that to the extent that higher charges are likely to lead to either (a) an earlier overall compliance date, or (b) a route to compliance that reduces human exposure to pollution more quickly, higher charge levels must be adopted as part of the final CAZ plans if they are to satisfy the necessary legal requirements. ClientEarth considered that the analysis also shows that by further increasing the charge for LGVs to £12.50, the "stay and pay" response could be reduced by a further 15%. They also considered that given the extent that a higher LGV charge would lead to more rapid pollution reductions, it would need to be included in the Councils' final plan.

3.11.11 The scope of permanent and temporary exemptions should be limited

3.11.12 ClientEarth urged the GM Councils to limit the scope of permanent local exemptions to the greatest extent possible and considered that if exemptions are set too broadly they risk undermining the effectiveness of any CAZ and therefore the likelihood of achieving compliance with NO_2 limit values in the shortest possible time. The focus should instead be on providing direct support to people and businesses to switch to alternative cleaner forms of transport. In particular, ClientEarth did not agree with the Councils' proposals to provide discounts to those PHVs also used as private vehicles.

3.11.13 Again ClientEarth urged the GM councils to limit the scope of temporary local exemptions to the greatest extent possible and considered that if exemptions are set too broadly they risk undermining the effectiveness of any CAZ and therefore the likelihood of achieving compliance with NO_2 limit values in the shortest possible time. In particular, ClientEarth strongly disagreed with the exemption for LGVs and minibuses for a number of reasons. ClientEarth noted the GM Councils' own analysis, which showed that LGVs account for 29% NOx road transport emissions, and that LGVs are the second biggest contributor to illegal levels of NO_2. ClientEarth also disagreed with the Councils' rationale behind the exemption but in any event in its view the priority of the Councils' air quality plan should not be to avoid the disruption to the market value of second hand LGVs but rather to protect peoples' health as quickly as possible. If there was to be any such exemption it should be limited to the greatest extent possible.

3.11.14 ClientEarth considered that the GM councils should instead be focusing their efforts on working with government to provide help and support for drivers and fleet managers to clean up or upgrade their vehicles, and/or adopt technologies to help them manage their transport needs more efficiently and use cleaner alternatives.

3.12 **Business representations**

3.12.1 441 businesses responded to the consultation, as well a number of regional and national stakeholders who represent GM businesses. Their feedback is included in the AECOM Report.

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3.12.2 The Federation of Small Businesses, GM Chamber of Commerce and CBI wrote a joint letter as part of their submission to the GM Clean Air Plan consultation. They recognised the need to address poor air quality but considered that now was not the right time to be moving forward with the proposed structure and format given the difficulties faced by the business community as a result of COVID-19 (supported by a business survey). They suggested that:

3.12.3 The financial offer falls way short of what is needed, and it should be made available as quickly as possible and prior to the start of the CAZ itself.

3.12.4 The introduction of charging should be delayed so businesses have adequate time to make the necessary changes, recognising the extreme economic circumstances created by Covid-19: otherwise the charges may result in increased business costs without achieving the desired reduction in pollution: the CAZ should not be introduced sooner than 2024.

3.12.5 GM should revisit the proposals to reflect current, short and medium term requirements taking account of updated data on the impact of the pandemic on air quality in GM.

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4 Summary of consultation process

4.1 Introduction

4.1.1 Between 8 October and 3 December 2020, a consultation on the GM Clean Air Plan was held[18] which included the statutory consultation on the proposed Clean Air Zone Charging Scheme**.** Over this period an extensive communications, marketing and engagement campaign encouraged members of the public, businesses and organisations to respond to the consultation.

4.1.2 Responses were made through an online questionnaire, by email, letter and telephone call.

4.1.3 The information provided at consultation can be found on cleanairgm.com and included a consultation document, Equalities Impact Assessment, Data Evidence and Modelling consultation summary report and the GM Clean Air Plan Policy for consultation. As well as this there were information pages explaining what the policy for consultation meant for different vehicle types and there was also a virtual consultation platform, with animations and videos.

4.1.4 The campaign to drive consultation responses included using outdoor advertising, local press advertising, radio advertising as well as social media and digital advertising. Local Authorities' channels were also used, including residential magazines, newsletters and their own advertising spaces.

4.1.5 During the consultation, TfGM and the 10 GM Local Authorities engaged with stakeholders, businesses and members of the public. This included stakeholder meetings, online events with affected groups, meeting with networks and online chat sessions.

4.1.6 There was no face-to-face engagement activity due to social distancing restrictions in place during this time, this had been factored into the planning for the consultation.

4.1.7 All responses received during the consultation went to AECOM[19] – the agency appointed by TfGM on behalf of the ten Local Authorities to categorise, code and analyse the responses. AECOM have reviewed and summarised all responses received during the consultation period. This process, and the analysis from it, are summarised in the AECOM "Clean Air Plan Consultation" report[16].

4.1.8 The categorisation, coding and quality assurance checking was undertaken by AECOM. In addition to this, TfGM undertook additional quality assurance on the following points to check comments had been coded correctly:

18 The consultation did not seek a view on whether to make a scheme as that has been mandated by the Secretary of State. The GM Policy set out a position for consultation on the daily charge, discounts and exemptions of a Category C GM Clean Air Zone, and the proposals for the supporting funds.

19 The majority of responses went directly to AECOM, but where a consultation response was sent directly to TfGM, a Local Authority or GMCA, it was then forwarded to AECOM.

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- Responses from individuals / organisations that represent people;
- Comments relating to the EQIA;
- Comments that had been highlighted by AECOM / TfGM as containing detailed evidence; and
- All other responses – an additional 10% 'quality assurance' check of responses to key questions across the AECOM codeframe.

4.2 Approach to reviewing responses

4.2.1 As previously stated, AECOM received, categorised and coded all the responses to the consultation. This was done by creating a code frame (or a coding framework), further information of which can be found in Appendix A of AECOM's consultation report[20].

4.2.2 TfGM officers also reviewed the themes to identify and consider the substantive issues and observations raised by consultees and to ensure that criticisms of, or suggested modifications to, the proposals were identified.

4.2.3 For respondents who represented others (such as trade associations, organisations), TfGM officers reviewed all those responses, regardless of which questions a respondent had answered or how AECOM had coded the response.

4.2.4 For all other responses (such as those from members of the public and other stakeholders), TfGM officers reviewed c.10% of responses to key questions. The purpose of this exercise was to review how AECOM had coded the responses and to provide reassurance that they had been correctly coded.

4.2.5 The responses were reviewed by appropriate TfGM officers and advisors who had developed the proposals, and who therefore had the expertise to review the response depending on which question had been answered. The output of the 10% quality assurance review was then shared with AECOM at a formative stage, so any issues raised could be incorporated into the coding and consultation analysis.

4.3 Approach to reviewing late responses

4.3.1 The consultation closed at 23:59 on 3 December 2020. Section 2.3.1 of the AECOM report shows that 17 responses were received after the consultation deadline. In the interests of fairness to those who took part within the consultation window, AECOM have summarised late responses separately and they are not counted in the final number of responses.

[20] The majority of responses went directly to AECOM, but where a consultation response was sent directly to TfGM, a Local Authority or GMCA, it was then forwarded to AECOM.

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4.3.2 AECOM found that comments made by late respondents did not raise any substantive new issues beyond those already identified in the responses submitted before the close of consultation.

4.4 Approach to reviewing qualitative research

4.4.1 As well as categorising and coding the consultation responses, AECOM were also appointed by TfGM on behalf of the ten GM Local Authorities to undertake qualitative research to complement the consultation process. This qualitative research explored the impact of the proposals and the impact of COVID-19 on the most impacted groups. This included small and micro businesses, the hackney and private hire trade, the freight and logistics sector, public transport users and those with respiratory conditions.

4.4.2 Online focus groups and one-to-one interviews were set up to understand participants' views on air pollution, the impact of the clean air plan proposals (including the proposed boundary, operation, charges, discounts and exemptions), the funds and finance available to support those impacted and the impact of Covid-19 on the ability to respond to the proposals.

4.4.3 Further information on the methodology, the information provided to participants and the outcome of the research can be found in Appendix A of AECOM's report.

4.4.4 The feedback from the qualitative research was considered alongside the consultation responses, as part of assessing the revisions to the policy and package of measures.

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5 GM Minimum Licensing Standards for hackney carriages and private hire vehicles[21]

5.1 Hackney carriage and PHV services are a significant part of GM's transport offer. In 2018, GM's ten local authorities agreed to collectively develop, a common set of Minimum Licensing Standards (MLS) for Taxi and Private Hire services that cover the whole of GM. At that time, the primary driver for this work was to improve public safety, but vehicle age and emission standards in the context of the Clean Air agenda were a consideration.

5.2 As licensing is a local authority regulatory function, the work to devise the MLS has been undertaken by the GM Licensing Managers Network, with TfGM supporting the co-ordination of this work, and alignment with other relevant GM policies, at a GM level.

5.3 The MLS have four areas of focus:

- Drivers: Criminal Records Checks; Medical Examinations; Local knowledge test; English language; Driver training; Driving Proficiency; Dress Code.

- Vehicles: Vehicle emissions (diesel Euro 6 and above, petrol Euro 4 and above with an ambition for a zero-emission capable fleet); Vehicle ages (under 5 years at first licensing, no older than 10 years); Vehicle colour (Black for Taxi/Hackney, white for Private Hire Vehicles); Vehicle livery (common GM design with Council logo incorporated); Accessibility (all Taxis to be wheelchair accessible); Vehicle testing; CCTV; Executive Hire; Vehicle design and licensing requirements.

- Operators: Private Hire Operators/staff will require basic criminal record check; more stringent requirements in relation to booking records; Operators to take more responsibility for the behaviour of their drivers.

- Local Authorities: Applications may be submitted up to 8 weeks in advance of license expiry; Once determined, license issued within 5 working days; Agree to develop common enforcement approach and a framework to which licensing fees are set; Councillors to receive training before they hear applications.

5.4 The trade asked for certainty, funding, and long lead in times for any changes. Greater Manchester local authorities therefore undertook a parallel consultation alongside the GM Clean Air Plan on the proposed standards, so that that charging, funding, and licensing policy positions were presented in tandem, so the trade could see the policy landscape which would affect them.

[21] The GM Minimum Licensing Standards are a proposed common set of standards for GM-licensed hackney carriages and private hires, they cover driver standards, vehicle standards, operator standards and local authority standards. Further information on the standards is available here: gmtaxistandards.com/minimum-licensing-standards

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5.5 Whilst MLS will complement the GM Clean Air Plan, common vehicle standards will not be in place prior to the launch of the GM Clean Air Zone. Therefore, addressing the feedback raised with each element of the policy and providing a response GM Local Authorities have taken into consideration that licensing conditions will not be used at this stage to support delivery of the GM Clean Air Plan, however, all future conditions around vehicle standards will complement this activity and the vehicle standards will transition via local implementation plans from late 2021. More information can be found at gmtaxistandards.com

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6 Approach to responding to consultation findings

6.1 GM's approach to responding to the consultation findings was to carry out a review of AECOM's consultation report to identify all major issues raised, and then to consider each of these in turn.

6.2 A response was prepared to each issue, as set out in Chapters 7 - 9 of this report. These responses either acknowledge the issue but set out why GM will not be making a change to the proposals, or set out a recommended change and the justification for this.

6.3 Any changes were considered in terms of whether they were in line with the Government's guidance. The Government has provided guidance on the process that local authorities must follow in developing their Clean Air Plans[22].

6.4 In developing the response to each issue, GM took into account the responses to the consultation, qualitative research findings, and any relevant evidence from the COVID-19 impacts analysis, Equalities Impact Assessment and Economic Impact analysis[23].

6.5 GM was not consulting on whether a GM-wide CAZ C should be implemented, as that is mandated by the Ministerial Direction[24]. Nevertheless, respondents did comment on whether they thought a CAZ should be implemented in GM or not. Where issues raised were out of scope of the consultation, a response has been provided but changes to the proposals were not considered.

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[22] Department for Environment, Food and Rural Affairs and Department for Transport. 2020. Clean Air Zone Framework. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/863730/clean-air-zone-framework-feb2020.pdf

[23] These reports can be found on cleanairgm.com

[24] The ministerial direction can be found here: Appendix 2 - 200316 Greater Manchester NO2 Plan Direction.pdf (greatermanchester-ca.gov.uk)

7 GM Authorities' Response to Clean Air Plan Consultation: Consultation Process

7.1 Throughout the questionnaire, respondents provided comments on the consultation process and materials as well as making comparisons between other cities' Clean Air Plan consultations and Clean Air Plans. This section explains the feedback provided and issues raised, the responses and outcomes from Greater Manchester.

7.2 Comments on consultation materials

7.2.1 **Issue**: Most comments about the consultation materials referred to the consultation documents themselves or the questionnaire. Participants commented that the documents were too long or difficult to understand, believing that this would deter people from completing the survey. Others felt the consultation materials lacked evidence and data regarding the impact of vehicles on pollution levels.

7.2.2 **Response**: GM recognises the technical nature of the proposals. The technical information has been made available for those who wish to read it to allow consultees to respond to the consultation. To ensure that the technical nature of the consultation was not a barrier to response, GM undertook a range of activity to ensure that anybody who wished to participate in the consultation could do so. Information was provided in a number of formats and accessibility was a central part of the consultation and communication and engagement approaches. Measures included:

Steps taken to provide information in accessible formats for lay people:

- A consultation document that summarised the policy at consultation, the questions being asked at each stage and an explanation of what was in and out of scope of the consultation. This was published alongside an equalities impact assessment.
- Web pages explaining what the proposals meant for each vehicle type, including a short animation.
- The production of accessible information about the consultation and how to participate, including fact sheets and a short animation with subtitles.
- Online meetings with community groups and affected individuals to ensure that the purpose and scope of the consultation was articulated simply.
- The provision of a dedicated phone line to answer queries, supported by a 'LanguageLine' service for non-English speakers.
- A call-to-action statement translated into Greater Manchester's top six languages, with guidance on how to access further support.

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- A virtual engagement platform, which sought to replicate face to face engagement by providing all consultation materials in one place. A chat facility was also available for members of the public to speak to TfGM staff about the consultation.

- Weekly monitoring of the participant profile to inform interventions e.g. gender, age, ethnic origin, health status, local authority area etc.

Steps taken to provide all the technical information for those who wanted to take into account all the information available:

- Publication of a suite of technical documents, for those who wanted to be fully informed, alongside a summary report of the data, evidence and modelling underpinning the proposals.

7.2.3 **Outcome**: No change, respondents were able to make informed views on the proposals and were able to provide their feedback.

7.3 General criticism of the ten GM Local Authorities, Mayor of GM, TfGM and Government

7.3.1 **Issue**: Comments critical of the ten GM Local Authorities, Mayor of GM, TfGM or the Government related to participants feeling that the proposals were unfair, poorly timed and designed to make money for councils and local government whilst causing hardship for those affected.

7.3.2 **Response:** Greater Manchester local authorities have been directed by the Government to introduce a Clean Air Plan to bring nitrogen dioxide (NO_2) levels within legal limits in "the shortest possible time"[25]. The Government asked Greater Manchester to continue to progress the Clean Air Plan, and to undertake the consultation, based on proposals developed before the COVID-19 pandemic that showed compliance would be achieved by 2024[26]. Alongside the consultation GM assessed the possible effects of COVID-19 on the Clean Air Plan and the consultation asked questions about the impact of COVID-19 on impacted groups, to inform future decisions on each aspect of the final plan.

7.3.3 The Clean Air Zone is not designed to make a profit, however any net proceeds would be applied to further deliver the Local Transport Plans of the 10 GM Local Authorities, in accordance with the Transport Act[27].

7.3.4 **Outcome:** No change in GM Clean Air Plan Policy.

7.4 Comparisons between the GM CAP proposals and other UK schemes

[25] https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/746095/air-quality-no2-plan-directions-2017.pdf
[26] July 2020 GMCA report https://democracy.greatermanchester-ca.gov.uk/documents/s8746/Clean%20Air%20consultation%20Final%2022.7.11.08am.pdf
[27] https://www.legislation.gov.uk/ukpga/2000/38/part/III/chapter/I/crossheading/charging-schemes

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7.4.1 **Issue**: Participants made comments comparing the GM CAP proposals with those proposed in Leeds and Birmingham or London's existing Ultra Low Emission Zone (ULEZ). Some reflected on how some local authorities had decided to postpone or cancel their Clean Air Zones as a result of the impact of the COVID-19 pandemic. Respondents believed these decisions had been made due to the impact of COVID-19 on the economy and the feasibility for businesses to upgrade their non-compliant vehicles, as well as the impact of COVID-19 on traffic and pollution levels. They questioned whether a Clean Air Zone was still required or whether roadside nitrogen dioxide levels were now within legal limits across Greater Manchester.

7.4.2 **Response**: Before the COVID-19 pandemic, Greater Manchester's Clean Air Zone and wider measures had been planned to launch in Spring 2021. In July 2020 it was announced that the launch of the CAZ would be delayed by 12 months, in light of the pandemic, to be launched in Spring 2022.

7.4.3 Whilst the COVID-19 pandemic has caused changes that radically altered transport patterns and behaviour, the relaxation of 'lockdown 1' (March – May 20) travel restrictions since June 2020 led to increasing vehicle flows. By the introduction of 'lockdown 2' (November 20), traffic flows were at around 85% of typical pre-COVID-19 levels. Because the GM Clean Air Plan is required[28] to take action to take NO_2 levels over a number of years into the future in order to demonstrate compliance with legal limits[29], the nearer term influence of COVID-19 on air quality is not expected to lead to sufficiently long-term reductions in pollution such that the modelled exceedances of the legal NO_2 limits will be met without implementing a Clean Air Zone. The 10 local authorities would only be relieved of the obligation to implement a Class C charging scheme in any event if the Ministerial Direction were to be revoked or varied.

7.4.4 **Outcome** No change to the proposal to deliver a Clean Air Zone.

7.5 Comparisons between the GM CAP and the London Ultra Low Emission Zone (ULEZ)

7.5.1 **Issue**: Respondents made comparisons to London's ULEZ, some felt it had not helped to reduce congestion and emission levels there and suggested it would not make a difference in Greater Manchester either. Some felt other initiatives were needed (e.g. improved public transport) whilst others suggested proposals in GM should go further to more closely resemble London's ULEZ.

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[28] 16 March 2020 Ministerial Direction https://democracy.greatermanchester-ca.gov.uk/documents/s8746/Clean%20Air%20consultation%20Final%2022.7.11.08am.pdf

[29] The modelling approved by government of NO2 concentrations in Greater Manchester predicts that exceedance of the legal limit is likely to continue until 2027, if action is not taken to reduce road vehicle emissions.

7.5.2 **Response**: Whilst developing the GM Clean Air Plan's Outline Business Case (OBC) three options were identified which would deliver compliance by 2024 in line with the Government's primary success criteria. The options were: (i) Proposals including a GM-wide Clean Air Zone to include non-compliant cars within the inner ring road, and wide-ranging support measures; (ii) Proposals including a GM-wide Clean Air Zone with an Ultra-Low Emission Zone within the inner ring road, and wide-ranging support measures; and (iii) Proposals including a GM-wide Clean Air Zone and wide-ranging support measure.

7.5.3 As set out in the Strategic Case of the OBC[30], compliance was forecast to be achieved in all local authorities in GM in 2024 under all three options. Implementing a CAZ D within the inner ring road, in addition to a GM-wide CAZ C, was not forecast to bring forward the year of compliance.

7.5.4 Having identified that these three options achieved compliance in the same year, the Government's secondary success criteria were applied to arrive at a preferred option. The secondary success criteria included consideration of the wider impacts of the proposals and the cost to implement them. This then identified a GM-wide Clean Air Zone category C with wide-ranging support measures as the best performing option which would achieve the required reduction in NO_2 levels in the shortest possible time, in the most cost effective way, whilst minimising the wider impacts on the people and economy of Greater Manchester[31].

7.5.5 Following a range of updates to the modelling process as the GM CAP progressed from OBC approval by Government, and the associated Ministerial Direction in 2019 to proceed with a GM-wide CAZ C scheme, further modelling was carried out. A sensitivity test was undertaken to check that the inclusion of private cars within GM CAP preferred option would still not bring forward the first year of compliance from 2024. This test confirmed the conclusions set out in the OBC, with two exceedances still occurring in 2023 with a CAZ D within the inner ring road.[32] A further sensitivity test also showed that supplementing a Class C GM wide CAZ with an Inner Ring Road CAZ including charging LGVs entering the City Centre at the outset did not bring forward compliance from 2024. For further discussion, see Appendix 9 of the GMCA Report of 25th June 2021.

7.5.6 The Ministerial Direction issued in March 2020 required the 10 local authorities to implement their local plan which was based on a Class C CAZ.

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[30] Strategic Case (ctfassets.net)
[31] https://assets.ctfassets.net/tlpgbvy1k6h2/uCbNfiDpTY49uAUTFEzVO/b3ae7ceb4e8be0dcb36008fba4939ce9/Options_Appraisal_Report.pdf
[32] This report is available here: https://assets.ctfassets.net/tlpgbvy1k6h2/21Gu3GqlPyBUO7VNvFGuZO/e38a10f200eaa72e435aa60c1c014d7b/30_-_GM_CAP_Alternative_Sensitivity_Test_Modelling_Summary_Note.pdf"

7.5.7 GM's forecasting has consistently shown that a GM-wide CAZ C achieves compliance in 2024 across GM and that no other scheme has been identified that can achieve compliance more quickly, including the implementation of a CAZ D within the inner ring road (IRR). This has been the result of modelling carried out at OBC and prior to consultation. The modelling of the post-consultation policy confirms that compliance is forecast to be achieved in 2024. Although sensitivity testing has not been carried out considering a CAZ D in addition to the post-consultation policy, it can reasonably be concluded that a CAZ D in the IRR would not bring forward the date of compliance with the legal limits in Greater Manchester from 2024. This is because the results of the modelling for the Preferred Package show that there are 5 points of exceedance remaining in 2023 before compliance occurs in 2024. The spatial pattern of exceedance remains consistent, but the maximum concentrations are now at locations outside the IRR on the A58 Bolton Road, Bury. Modelling of the impacts of a CAZ D in the IRR have previously shown negligible impact on NO2 concentrations at the A58 because it is not strategically linked with access to the regional centre. Implementing a CAZ D in the IRR would not be expected, therefore, to bring forward compliance at the A58 or therefore across GM as a whole.

7.5.8 **Outcome**: No change in GM Clean Air Plan Policy. It should be noted that, as part of Manchester City Council's, Salford City Council's and Transport for Greater Manchester's City Centre Transport Strategy[33], there is an ambition for work to be undertaken to see whether, in the future, it is feasible and practical to implement an Ultra Low Emission Zone (ULEZ) in the city centre.

7.6 **Criticism that the updated consultation proposals did not address legal failings previously identified in earlier correspondence.**

7.6.1 **Issue:** Client Earth stated that the Council's updated consultation proposals did not address legal failings previously identified in earlier correspondence. In its view the option to be pursued is one that must not only achieve compliance in the shortest possible time but must also be the one that reduces human exposure to pollution more quickly.

7.6.2 **Response:** GM has followed the guidance from DEFRA on the choice of options as explained in Appendix 9 of the June 2021 GMCA report. Client Earth's earlier correspondence in 2019 was sent to the Secretary of State and/or his legal advisers. As explained in Appendix 9 of the June 2021 GMCA report, the authorities are obliged to comply with the direction subsequently given by the Secretary of State to implement the local plan for NO_2 compliance that was considered by the Secretary of State on March 16 2020 which included a Charging CAZ Class C within GM.

7.6.3 **Outcome**: Not change in GM Clean Air Plan Policy.

7.7 **Criticism of failing to account for modelling uncertainties**

[33]https://assets.ctfassets.net/nv7y93idf4jq/6HANAC6XKWnyvZ508tbVfq/f661cc31bad890a4f388de49e79c1826/CCTS_Full_Document_Final_170321.pdf

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7.7.1 **Issue**: Criticism that GM's CAZ proposals fail to account for modelling uncertainty in a way that ensures that the proposals are "likely" to deliver compliance with legal limit values as predicted.

7.7.2 **Response**: GM have followed Government guidance in terms of considering modelling uncertainties.

7.7.3 A discussion of uncertainty in the modelling of the Option for Consultation is set out in the Analytical Assurance Statement[34].

7.7.4 GM have considered the impacts of COVID-19 on the GM CAP, as set out in the 'Impacts of Covid-19 on the GM CAP Report'[35] and have specifically considered the impact on uncertainty, in line with Government guidance. The Government's guidance on reflecting the impacts of COVID-19 within the modelling is set out in Appendix A of the 'Air Quality Modelling Summary Report'[36]. GM's proposed approach to representing the impact of Covid-19 in core modelling scenarios is set out in Appendix D of that report. This includes a discussion of uncertainty, at section 7 of Appendix D, concluding that there is greater uncertainty as a result of the pandemic, with some aspects potentially worsening air quality and others potentially providing air quality improvements. Overall, the report concludes that it is very unlikely that any improvements to air quality would be of a sufficient scale to mean that action was no longer required

7.7.5 GM has set out it's proposed approach to assumptions about the medium-to-long term impacts of the pandemic in a paper titled 'GM's proposed approach to representing the impact of COVID-19 in core modelling scenarios', supplied as Appendix D of the Air Quality Modelling Report. In summary, GM has made the following changes to the modelling process for the core scenario, in in the light of COVID-19:

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[34] Available at Analytical Assurance Statement (ctfassets.net)
[35] Supplied as Appendix 5 to the June GMCA Report 'Greater Manchester Clean Air Plan'
[36] Supplied as Appendix 6 to the June GMCA Report 'Greater Manchester Clean Air Plan'

- Delaying the CAZ launch date to 2022;

- Applying a delay to normal fleet upgrades to the private car, van, and taxi fleets, based upon the latest evidence and forecasts relating to vehicle sales; and

- Applying a change to the cost modelling process such that those non-compliant LGVs and taxis - hackney carriage and PHV - that would have upgraded to a compliant vehicle without the pandemic but have not done so are assumed not to upgrade as a result of the GM CAP.

7.7.6 In line with JAQU's guidance, GM has taken a conservative approach to representing the impacts of Covid-19. Sensitivity testing identified the age of the fleet as the most impactful factor, so by incorporating changes within the core scenario at this stage GM is less sensitive to the impacts of the pandemic.

7.7.7 In terms of the vehicles in scope for the scheme, bus and commercial vehicle traffic has largely returned to pre-pandemic levels (taxi and coach travel remain suppressed). Therefore, it is reasonable to assume that the prior assumptions about traffic volumes for these vehicle types remain valid.

7.7.8 Uncertainty remains around car traffic. Although there is some evidence that, for example, commuter traffic may not return to pre-pandemic levels, GM has taken the conservative approach of assuming that car traffic volumes remain as previously forecast. This is in line with JAQU guidance.

7.7.9 Sensitivity testing carried out at OBC suggested that GM was not highly sensitive to small changes in car traffic; further sensitivity testing will be carried out at FBC.GM has also applied a change, unrelated to Covid-19, reflecting the current or planned and funded deployment of zero emission buses on the network.

7.7.10 In addition, following the feedback from consultation, evidence of the impact of Covid-19 on the trade, research and stakeholder engagement with the taxi trade, GM has revised its assumption about the proportion of taxis that will upgrade to ZEC, rather than a compliant Euro 6 vehicle, to make it more conservative. It is possible that future regulatory reform, licensing policy, or the impact of investment in charging infrastructure will mean that more taxis than forecast upgrade to ZEC.

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7.7.11 GM's proposed approach to representing the impacts of Covid-19 in the modelling was approved by JAQU on 4th May 2021, as per the letter presented as Appendix D of the 'Air Quality Modelling Summary Report'. In order to achieve compliance in the shortest possible time, GM needs to progress the modelling underpinning the GM CAP based on a set of reasonable assumptions about the medium-to-long term impacts of the pandemic. GM has supplied in the Air Quality Modelling Report37 its best estimates of what is likely to happen based on the available evidence.

7.7.12 Nonetheless, uncertainty remains and as a result, sensitivity testing is planned and underway to consider the possible impacts of delayed development plans, increased homeworking, changes to GDP, impacts on public transport, and changes to vehicle purchasing costs and the affordability of upgrade as a result of the pandemic. Sensitivity testing will also be conducted to assess the possible impact of other factors affecting certainty, unrelated to the pandemic.

7.7.13 If the sensitivity testing identifies any potential issues with the plan as it stands, this will indicate that adaptive planning is required and GM is working with JAQU to agree mechanisms to facilitate this. Adaptations could include reviewing the charge levels; funding offers; or eligibility criteria for funding, with the aim of further encouraging upgrade if it appears that more people are choosing to stay and pay than forecast. GM could also review permanent discounts and exemptions if it becomes apparent that these vehicles constitute a greater proportion of the on-the-road fleet than expected.

7.7.14 Once the plan is in place, monitoring will be required to ensure that the policy and proposals contained in the GM CAP remain appropriate throughout the lifetime of the interventions. GM will ensure that the Monitoring and Evaluation Plan sets out to address issues where uncertainty remains as to post-pandemic conditions (or for other reasons), as identified in the sensitivity testing, and for example in terms of vehicle fleets, travel patterns and the provision of bus services. At the time of writing, the UK is still operating under pandemic-related restrictions on activity and travel. It is therefore too early to say with certainty what the impacts of Covid-19 will be post-pandemic on behaviour, travel patterns, businesses and the economy. If the monitoring reveals issues with the performance of the measures that form the plan, again, an adaptive planning approach will be required, such that GM and JAQU can agree any changes to the plan that would make it more effective.

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[37] Supplied as Appendix 6 to the June GMCA Report 'Greater Manchester Clean Air Plan'

7.7.15 In addition to more general concerns about failing to account for modelling uncertainty, a specific concern was raised by Client Earth. It points out that the authorities have themselves recognised that "forecasts of improvements in air quality have been shown to be overly optimistic in the past; if this was the case, then compliance may take longer to achieve and any intervention would be of greater value than presented in this OBC". The forecasts referenced are historic national Defra PCM projections based on natural turnover of vehicles, which are different to forecasts based on the calculated outcomes of an air quality specific intervention such as those developed for the GM CAP. These historic national Defra PCM projections have been influenced by poorer real-world performance of vehicles than recorded in laboratory based tests, especially for Euro 4 and Euro 5 diesel vehicles. The incorporation of real-world driving tests into the most recent Euro 6 standards, has addressed the discrepancy between laboratory tests and real-world emissions and led to manufacturers delivering new cars and vans which now typically release rates of NOx below the Euro 6 standard. Therefore, the forecasts used for the CAP, which targets delivering a Euro 6 fleet onto GM roads more quickly than based on natural turnover alone is less likely to experience the same optimistic rate of improvement associated with the historic Defra projections which contained a larger proportion of Euro 4 and 5 vehicles.

7.7.16 The approach to quantifying modelling uncertainty is based on best practice Defra guidance (LAQM.TG16), and the RMSE for both verification zones shows the process has improved model performance and reduced the associated uncertainty to within the accepted tolerance for air quality management. Following the application of the verification process the predicted results are considered to be the most probable value. As part of the appraisal of model performance the monitoring data used for the model verification was reviewed and the outlier sites were deliberately included within the verification zone subsets. These outliers were skewed towards under-prediction and as a consequence will have produced a greater model adjustment factor and therefore final NO_2 concentration than would have resulted otherwise, as a precautionary approach. There is verification monitoring data adjacent to the A58 Bolton Road, Bury which is the location of the last point of compliance in the Preferred Package modelling scenario. The model performance at this key location shows that final adjusted model result is 10% greater than the measured concentration. This suggests that the modelling at this key location is both conservative and the uncertainty meets the guideline threshold described as 'ideal' within the Defra guidance, providing greater confidence in model predictions at this location.

7.7.17 **Outcome:** GM's analytical approach will continue to be guided by JAQU guidance and feedback from the TIRP. Updated Technical Reports, including an updated Analytical Assurance Statement, will be produced in support of the FBC.

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8 GM Authorities Response to Clean Air Plan Consultation: Clean Air Zone

8.1 Introduction

8.1.1 This section looks at the responses to the Clean Air Zone in the GM Clean Air Plan policy at consultation and the response and outcome for the final GM Clean Air Plan.

8.1.2 Many of the consultation responses supported the elements of the Clean Air Zone, including the boundary, the hours of operation and the discounts and exemptions in place. Some responses were in opposition to the Clean Air Zone and some suggested changes.

8.1.3 To respond to the feedback and support owners of non-compliant vehicles based in Greater Manchester there are a number of changes to the permanent discounts and exemptions and temporary exemptions.

8.2 General feedback on the proposed Clean Air Zone

8.2.1 **Issue**: The feedback on the Clean Air Zone was mixed, with some supporting the boundary, operating hours, and management of the Clean Air Zone. Whereas other respondents had concerns about these areas of the package. There were several suggested amendments. These covered both suggestions to expand on the plans, either to make the area larger, include more vehicles or have stricter compliance. The suggestions also included looking at a smaller Clean Air Zone or using interventions other than the introduction of a Clean Air Zone to improve air quality.

8.2.2 **Response:** Some of these matters are addressed below. The 10 authorities have no discretion, given the Ministerial Direction referred to above, not to have a GM wide charging zone or not to implement any GM charging scheme.

8.2.3 **Outcome**: No change in GM Clean Air Plan Policy in respect of a GM-wide charging scheme.

8.3 The impact the GM Clean Air plan would have on air quality

8.3.1 **Issue:** Of the survey responses received, a large number (1,073) expressed a degree of concern that the proposal would not improve air quality, or reduce pollution. Similarly, 459 respondents commented that they thought the CAP would have little or no impact.

8.3.2 **Response:** Improved air quality is the key objective of the GM CAP.

8.3.3 The GM CAP will reduce emission concentrations to a compliant level in the whole of GM by 2024 and in so doing, will reduce individual and societal health related and environmental costs.

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8.3.4 Modelling has been developed in line with the Government's Joint Air Quality Unit (JAQU) to forecast future scenarios with and without the CAP in place. This forecasting enables estimation of vehicle fleet profiles and associated emissions.

8.3.5 The modelling[38] shows that the CAP will encourage a large number of older vehicles to be retrofitted or upgraded to cleaner vehicles. That forecast is based on observed and empirical data and established model forecasting methodologies agreed with JAQU.

8.3.6 **Outcome:** No Change in GM Clean Air Plan Policy, however, the number of comments raising concerns about the effectiveness of the scheme in reducing air quality, potentially points towards a need to further communicate the requirements and benefits of the CAP, if people are unaware or remain unconvinced. This public communication and building of awareness will continue as the scheme progresses.

8.4 Support for the proposed GM Clean Air Plan

8.4.1 **Issue:** While some people expressed concern about the CAP in the consultation feedback, many expressed their support for the scheme in general and the efforts to improve air quality through the reduction of non-compliant commercial vehicles.

8.4.2 **Response:** This consultation feedback indicates an acknowledgement that in order to comply with legal air quality levels, there needs to be greater change towards cleaner vehicles.

8.4.3 The CAP development has gone through multiple stages, including the options appraisal. That options assessment concluded that a GM-wide category C Clean Air Zone achieved air quality compliance in the shortest possible time. Since that stage, the proposals forming the CAP have been refined based on further evidence gathering and stakeholder consultation, in order to optimise the proposed plan.

8.4.4 Change is required to improve air quality and there are benefits associated with this. The CAZ is required to encourage compliant behaviour which in some cases will generate additional business cost, but the CAP is designed to support vehicle owners affected by this through the proposed grants and vehicle finance.

8.4.5 **Outcome:** No Change in GM Clean Air Plan Policy.

8.5 **The economic impacts on Greater Manchester**

8.5.1 **Issue:** A large number of comments (747) had a reference to perceived negative impacts on business, trade and the economy in GM. A similar number (858) alluded to concerns over increased prices of goods / services / fares being passed onto end consumers / passengers.

[38] Local Plan Transport Model Forecasting Report (T4) that can be found at: https://cleanairgm.com/technical-documents

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8.5.2 **Response:** Funding of the GM Clean Air Plan will in the main be met by Central Government. This will include the funding to support vehicle upgrades.

8.5.3 The infrastructure costs will be met by central Government and the operational costs through a combination of Government funding and CAZ revenue.

8.5.4 Analysis has been undertaken around the economic impact of the GM CAP on businesses in GM, it reviews the economic impact of clean air zones, recognising that there are some direct costs to non-compliant vehicle owners. However, by investing in newer vehicles, vehicle owners may benefit from fuel savings as well as vehicle reliability improvements and an extended vehicle lifespan. Therefore, upgrading to a newer vehicle is not purely a business cost, there are also longer-term business benefits.

8.5.5 GM has been awarded over £120m of funding from Government to support owners of non-compliant vehicles with the costs of upgrade to compliant vehicles. The funding is intended to prioritise individuals, micro and small businesses and those most likely to be impacted by the CAZ charges with vehicles registered or licensed within Greater Manchester. The funding should reduce the risk that the costs imposed by the CAZ are passed on to consumers or passengers.

8.5.6 There are also wider economic benefits to introducing a clean air zone, including the potential reduction in early deaths, reduced time spent in hospitals and increase in the number of hours worked.

8.5.7 **Outcome**: No Change in GM Clean Air Plan Policy.

8.6 Clean Air Zone should include other pollutants and should include higher vehicle standards

8.6.1 **Issue**: Some respondents to the consultation suggested that the proposal consulted upon does not go far enough to tackle other pollutants and should set out stricter standards for compliant vehicles, such as zero emission capable vehicles only.

8.6.2 **Response:** The adoption of Clean Air Zones within England is based upon principles set out within the Clean Air Zone Framework – Principles for setting up Clean Air Zones in England, February 2020 guidance[39], jointly published by the Department for Transport (DfT) and Department for Environment, Food and Rural Affairs (Defra). This includes Clean Air Zone minimum classes and emission standards which are set out in Annex A of the guidance and which provide the basis for the GM CAP proposals, along with other CAZs across the UK.

[39] Department for Environment, Food and Rural Affairs and Department for Transport. 2020. Clean Air Zone Framework. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/863730/clean-air-zone-framework-feb2020.pdf

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8.6.3 The guidance states, “charging zones would apply only to older, higher-polluting models of vehicle types, so as to have a targeted impact on pollution”. This is in order to target higher emitting vehicles which contribute to pollution levels, whilst balancing the economic and market impacts of measures which accelerate the evolution of the vehicle fleet. The vehicle standards set out in the GM CAP are in line with this guidance.

8.6.4 The Government’s Air Quality Plan[40] (UK AQ Plan) states that, “unlike greenhouse gases, the risk from NO_2 is focused in particular places: it is the build-up of pollution in a particular area that increases the concentration in the air and the associated risks.” The UK AQ Plan requires local authorities with persistent exceedances of the legal Limit Value for NO_2 specifically, including those within GM, to undertake local action to consider the best option to meet legal NO_2 limits in the shortest possible time.

8.6.5 All ten of the Greater Manchester (GM) local authorities have received ministerial direction[41] to implement the local plan for securing compliance with the legal limits for nitrogen dioxide. The targeting of NO_2 emissions within the GM CAP is therefore based upon Government direction and reducing concentrations of this pollutant. Notwithstanding this focus, the measures adopted to encourage uptake of lower emitting vehicles across the region will support wider efforts to reduce emissions of other pollutants, such as carbon dioxide and particulates.

8.6.6 **Outcome:** No change in GM Clean Air Plan Policy, the plan will not be amended to specifically target other pollutants (in addition to NO_2) or specify higher vehicle emission standards than those proposed. However the GM Air Quality Action Plan[42] aims to support the UK Government in meeting and maintaining all relevant thresholds for key air pollutants at the earliest date to reduce ill-health in Greater Manchester.

8.7 **The Clean Air Zone should include private cars**

8.7.1 **Issue:** A number of respondents suggested that the proposals should go further and include a charge for non-compliant private cars travelling within the GM CAZ boundary.

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[40] Department for Environment, Food and Rural Affairs and Department for Transport. 2017. UK plan for tackling roadside nitrogen dioxide concentrations. Available at: https://www.gov.uk/government/publications/air-quality-plan-for-nitrogen-dioxide-no2-in-uk-2017

[41] Environment Act 1995 (Greater Manchester) Air Quality Direction 2020. Available at: https://democracy.manchester.gov.uk/documents/s18580/Appendix%202%20-%20Greater%20Manchester%20NO2%20Plan%20Direction.pdf

[42] GM Air Quality Action Plan https://secure.manchester.gov.uk/download/downloads/id/24676/greater_manchester_air_quality_action_plan_-_2016-2021.pdf

8.7.2 **Response:** The Outline Business Case (OBC) set out the process for determining the best performing option to achieve compliance in the shortest possible time, which was determined to be a GM-wide Clean Air Zone Class C (CAZ C), targeting non-compliant buses, coaches, taxis, private hire vehicles, HGVs and LGVs. An assessment of the GM-wide CAZ D option is included in the OBC and the Option Appraisal Report[43].This was further explored in analysis carried out post-OBC to meet JAQU's requirements, which concluded that a GM-wide CAZ Class D (inclusive of private cars) was not likely to bring forward the date of compliance with the legal limit value for NO_2 in Greater Manchester from that which would be achieved by implementing a CAZ Class C.

8.7.3 As set out in the Technical Note 17: Evidence supporting the decision not to progress with a GM-wide CAZ D[44] (which was published with the consultation materials), a scheme affecting private cars on this geographical scale is unprecedented – GM covers 1,280 km^2 whereas in comparison the CAZ D (incl. private cars) scheme proposed in Birmingham covers just $8km^2$. In order to develop, consult upon, and deliver such a scheme, a considerable volume of further planning activity would be required, encompassing research and data collection; modelling and analysis; policy development; scheme design and impacts assessments, amongst other activities. These activities would delay the implementation of the GM CAZ to such an extent that this option would achieve compliance with legal AQ Limit Value at a later date than the proposed CAZ C. It would not therefore achieve the primary objective of the GM Clean Air Plan (GM CAP), which is to achieve NO_2 legal compliance in the shortest possible timescales.

8.7.4 Furthermore, a secondary objective of the CAZ is to minimise the risk of significant unintended negative economic, social or environmental consequences resulting from the implementation of the GM CAP. Greater Manchester contains some of the most deprived areas in England. Across GM, some of the most deprived areas have poor public transport accessibility and in these areas people are more likely to own a non-compliant vehicle. Those on low incomes, with little or no savings, or with limited access to credit may not be able to afford to upgrade to a compliant vehicle, or to pay the charge. There is a significant risk that the costs imposed by a GM-wide CAZ D could force people out of employment or education, as well as limiting people's ability to travel to see their friends and family. In turn, this could lead to social isolation and hardship. A GM-wide CAZ D is therefore likely to have dramatic socio-economic ramifications across the north-west region and country as a whole and would require mitigations which are unlikely to be feasible.

8.7.5 This analysis is not materially affected by Covid-19 or other recent developments.

[43] https://assets.ctfassets.net/tlpgbvy1k6h2/uCbNfiDpTY49uAUTFEzVO/b3ae7ceb4e8be0dcb36008fba4939ce9/Options_Appraisal_Report.pdf

[44] Transport for Greater Manchester. 2019. Greater Manchester's Clean Air Plan to tackle Nitrogen Dioxide Exceedances at the Roadside. Note 17: Evidence supporting the decision not to progress with a GM-wide CAZ D. Available at: https://assets.ctfassets.net/tlpgbvy1k6h2/2WevOiPePeiHfkAHHQDr0e/54490777ff9af51dd42d6e20139d73e9/17_-_GM_CAP_Evidence_supporting_the_decision_not_to_progress_with_a_GM-wide_CAZ_D.pdf

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8.7.6 In addition to considering a potential GM-wide CAZ D, sensitivity testing was also undertaken to explore the implications of a CAZ D within the Inner Ring Road (IRR) before the Ministerial Direction was issued in March 2020. Its findings were reported within Technical Note 30– GM CAP Alternative Sensitivity Test Modelling Summary Note[45] (which was also published as part of the consultation). As this technical note sets out, like the Consultation Option (GM wide CAZ C), all modelled sites are compliant in 2024. The sensitivity test investigated whether the addition of a CAZ D within the inner ring road (IRR) could bring GM into compliance in 2023. The modelling showed that, with a CAZ D in the IRR, two sites remained non-compliant in 2023. This option would not, therefore, have brought forward the year of compliance relative to the Consultation Option. The Consultation Option was forecast to reduce exceedances from 203 to 57 in 2021, and a CAZ D in the IRR would have further reduced that number by 10. A CAZ D in the IRR would reduce the number of exceedances by 1 compared to the Consultation Option in 2023. A CAZ D in the IRR would bring more people in scope for a penalty, including private car drivers going to work or to visit the retail and leisure destinations in the city centre.

8.7.7 The impact of COVID-19 is expected to slow the natural turnover of vehicle fleet, as a result of lost new vehicle sales for cars, LGVs and taxis during 2020/21. This has the effect of increasing vehicle emissions in the future worsening air quality predictions, and also increases the number of non-compliant LGVs and taxis in-scope for the CAZ charge. In contrast the investment in electric buses will reduce emissions in both the Do Minimum and Do Something scenarios, along the specific route corridors of operation.

8.7.8 The results of the air quality modelling show a similar spatial pattern to those at OBC and consultation, where the last exceedances with the CAP in place are at the A34 John Dalton Street, Manchester and the A58 Bolton Road, Bury. Compared to the Option for Consultation and OBC modelling, the Policy following consultation displays a worsening on the wider road network where car and LGV emissions have increased due to an older fleet profile due to Covid-19. However, on the route corridors where the electric buses will operate, which include the A34 John Dalton Street there are improvements, with a reduction in exceedances inside the inner ring road on these routes.

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[45] Transport for Greater Manchester. 2020. Greater Manchester's Clean Air Plan to tackle Nitrogen Dioxide Exceedances at the Roadside. Note 30: Alternative Sensitivity Test Modelling Summary Note. Available at: https://assets.ctfassets.net/tlpgbvy1k6h2/21Gu3GglPyBUO7VNvFGuZO/e38a10f200eaa72e435aa60c1c014d7b/30_-_GM_CAP_Alternative_Sensitivity_Test_Modelling_Summary_Note.pdf

8.7.9 The results of the air quality modelling for the Policy following consultation show that there are 5 points of exceedance remaining in 2023 before compliance occurs in 2024. The spatial pattern of exceedance remains consistent, but the maximum concentrations are now at locations outside the Inner IRR on the A58 Bolton Road, Bury. Modelling of the impacts of a CAZ D in the IRR have previously shown negligible impact on NO_2 concentrations at the A58 because it is not strategically linked with access to the regional centre. Therefore, it can be concluded that a CAZ D within the IRR would not bring forward the date of compliance with the legal limits from 2024. For further discussion, see Appendix 9 of the GMCA Report of 25th June 2021.

8.7.10 **Outcome:** No change in GM Clean Air Plan Policy, the plan will not be amended to include private cars within the scope of the GM CAP.

8.8 **Alternatives to a Charging Clean Air Zone should be prioritised**

8.8.1 **Issue:** Some respondents suggested that alternatives to a Charging Clean Air Zone should be prioritised over introducing a charge for non-compliant vehicles, with emphasis on discouraging road journeys and promoting sustainable transport modes such as public transport improvements and active travel.

8.8.2 **Response:** As set out within the GM CAP Outline Business Case – Strategic Case[46], a range of alternative options were assessed during the development of the GM CAP. An initial long-list of 96 options was sifted to a shortlist of 17 based upon the Government's Primary Success Criteria (reduction of NO_2 concentrations in the "shortest possible time"). The shortlisted measures included alternatives to a charging CAZ, such as increasing public transport capacity, localised junction improvements and electric vehicle incentivisation.

8.8.3 Following extensive analysis of the shortlisted measures, GM concluded that a charging CAZ across the region (with supporting measures) is necessary in order to achieve compliance in the shortest possible time. Further detail is available within the Strategic Case of the OBC and in the Options Appraisal Report[47]. The conclusions set out in the Strategic Case are consistent with Government guidance setting out a charging CAZ as the measure most likely to achieve EU Limit Values for NO_2 in towns and cities in the shortest possible time, and as the measure against which all other options must be benchmarked.

8.8.4 The Government has considered the suite of supporting analysis and evidence presented within the GM CAP OBC in advance of issuing a Ministerial Direction requiring all ten of the Greater Manchester (GM) local authorities to implement a charging CAZ Class C across the region.

[46] Transport for Greater Manchester. 2019. Greater Manchester's Outline Business Case to tackle Nitrogen Dioxide Exceedances at the Roadside – Strategic Case. Available at: https://assets.ctfassets.net/tlpgbvy1k6h2/3UC4AhiPenRw3hdKjTYHTg/2fb88ead100e042bf756d0562b977266/Strategic_Case.pdf

[47] The Options Appraisal report can be found here: cleanairgm.com/technical-documents

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8.8.5 GM's Transport Vision, as set out in the GM Transport Strategy 2040[48], is for world class connections that support long-term, sustainable economic growth and access to opportunity for all. GM's 5 year Environment Plan[49] sets out a vision of a GM that is a clean, carbon neutral, climate resilient city region with a thriving natural environment and circular, zero-waste economy. To meet the goals of the 2040 Strategy and the Environment Plan, TfGM, GMCA and the ten GM local authorities are continuing to develop wider measures which encourage the use of more sustainable transport modes, including significant investment in improving cycling and walking infrastructure across GM[50], additional electric vehicle charging infrastructure and reforming the bus market.

8.8.6 **Outcome:** No change in GM Clean Air Plan Policy. The Options Appraisal analysis has demonstrated that an alternative to a charging CAZ would not achieve compliance with legal limit values for NO_2 in the shortest possible time and therefore the proposals will not be amended. Complementary efforts to increase the proportion of journeys within GM which are made by sustainable transport modes will continue.

8.9 **The proposals should be implemented earlier**

8.9.1 **Issue:** Some respondents indicated that they would like to see the proposals implemented earlier than proposed, typically due to concerns regarding the health impacts of poor air quality or the climate crisis and the urgency to address this.

8.9.2 **Response:** The GM local authorities are under Ministerial Direction from Government to implement measures which would achieve compliance with Limit Value for NO_2 concentrations in the shortest possible timescale, and by 2024 at the latest.

8.9.3 The proposed 'go live' date of the GM CAZ on 30 May 2022 is considered the soonest feasible date for the Clean Air Zone to commence.

8.9.4 The ten GM Local Authorities are undertaking the preparatory implementation and contract arrangements required to deliver the CAZ and other GM CAP measures in order to maintain delivery momentum in line with the funding arrangements agreed with Government. TfGM is running the procurement exercises with potential suppliers on behalf of the ten GM local authorities to final evaluation and is to provide a report to allow the authorities to make a decision to award to the successful supplier(s) following receipt of the confirmation of funding from Government.

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[48] https://tfgm.com/2040-transport-strategy
[49] https://www.greatermanchester-ca.gov.uk/media/1975/5_year_plan_exec_summ_digital.pdf
[50] TfGM. 2021. The Bee Network. Available at: https://activetravel.tfgm.com/bee-network-vision/

8.9.5 The geographic scale of the zone (almost 1,300km2) is such that over 2,300 road signs and almost 1,000 automatic number plate recognition (ANPR) cameras will need to be installed on the highway network. The cameras need to be integrated into a technology platform, that will also be connected to the payment and vehicle checking services which have been established by central government. In addition, the operational teams of both TfGM and the chosen supplier must be recruited, trained and mobilised. Whilst much of this technology is tried and tested, the programme schedule is complex. This schedule currently shows that implementation of a scheme that has fully tested all of the component parts is late May 2022 and therefore this is the earliest date that the GM CAZ could launch.

8.9.6 The funds which support the introduction of the charging zone will be implemented from November 2021. To effectively manage the distribution of the funds it is necessary to develop an IT platform, integrate that with a number of third parties for the purposes of validating applicant data and allowing for applicants to apply to a number of selected financiers should they wish to apply for a financial product to support their vehicle upgrade. As such November 2021 is the earliest that the funds can commence being distributed.

8.9.7 **Outcome:** No change in GM Clean Air Plan Policy, given the extensive and complex activities which are required in order for the GM CAZ to become operational, 30 May 2022[51] is considered the soonest feasible date to launch a charging CAZ in Greater Manchester.

8.10 **Pollution levels do not warrant the measures being taken**

8.10.1 **Issue:** Some respondents felt that the GM Clean Air Plan was unnecessary and that the current pollution levels (including the improved air quality from the lockdowns during pandemic) do not warrant such measures being taken.

8.10.2 **Response:** Air quality monitoring undertaken by the ten GM local authorities illustrates that the legal limit value for annual mean NO_2 has historically been exceeded at a large number of locations across Greater Manchester.

8.10.3 Air Quality Modelling[52] carried out in support of the GM CAP shows that, without action, GM is not expected to comply with legal limits for NO_2 across the region until 2027.

8.10.4 **Outcome:** No change in GM Clean Air Plan Policy, evidence demonstrates that due to ongoing exceedances of the legal limit value for NO_2 across the GM region, existing and future pollutant concentrations within GM warrant the implementation of the GM CAP.

8.11 Clean Air Zones are a money-making scheme/congestion charge

[51] Subject to joint GM and JAQU agreement on overall 'readiness', including that the Central Charging Portal and national Vehicle Checker is' GM ready

[52] Which can be found in document AQ3 on https://cleanairgm.com/technical-documents/#2020-clean-air-plan-consultation

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8.11.1 **Issue:** A number of respondents have related the GM CAZ to previous proposals for a congestion charging system within GM. Specifically, the previous proposals were subject to a referendum held in 2008 which rejected the proposals. The proposed scheme as per the referendum in 2008 included tiered congestion charges which would have resulted in those travelling within an area bordered by the M60 motorway at peak times paying a congestion charge. An additional supplementary charge would also have applied for those travelling within an inner zone, the extents of which were broadly consistent with the IRR.

8.11.2 Other respondents have contended that the GM CAP is designed to generate money, relating the charges to a 'tax' on road users and referencing existing government measures such as fuel duty.

8.11.3 **Response:** A Clean Air Zone is a designated area within which certain higher pollution vehicles would pay a charge to drive. Vehicles which do not comply with the required emissions standards would pay a daily charge for each day on which they drive into, out of, within or through the Clean Air Zone. Vehicles which do comply with the emissions standards can continue to travel uncharged. The goal of a Clean Air Zone is to encourage owners of older, dirtier vehicles to upgrade to a cleaner vehicle. It does not aim to tackle congestion and in a successful scheme, revenues will decline over time as the fleet becomes increasingly compliant. The Clean Air Zone is not designed to make a profit, however any net proceeds would be applied to further deliver the Local Transport Plans of the 10 GM Local Authorities, in accordance with the Transport Act 2000[53].

8.11.4 **Outcome**: No change in GM Clean Air Plan Policy, a Category C charging Clean Air Zone will be implemented.

8.12 **Implementation of the Clean Air Zone should be delayed**

8.12.1 **Issue:** Respondents have suggested that the proposals to implement the GM CAZ charges should be delayed for a range of reasons, including:

- Economic impacts of the COVID-19 pandemic;
- Impacts of COVID-19 on travel behaviours and subsequent positive AQ impacts (e.g. reduced demand due to working from home);
- Wider legislative changes, such as bans on the sale of 100% Internal combustion engine powered vehicles: and,
- Potential supply issues with electric/low emission vehicles.

8.12.2 **Response:** The ten GM local authorities have received a ministerial direction requiring them to implement a charging Clean Air Zone Class C across the region in order to achieve compliance in the shortest possible time and by 2024 at the latest.

[53] https://www.legislation.gov.uk/ukpga/2000/38/part/III/chapter/I/crossheading/charging-schemes

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8.12.3 However, there are a number of permanent local exemptions, temporary local exemptions and permanent discounts that have been put in place. Some of these updated discounts and exemptions have been proposed in the final policy in order to provide more time to support businesses and individuals to upgrade their vehicles. Alongside this, the funding amounts available to support businesses and individuals to upgrade their non-compliant vehicles has increased in some cases, and more options are available for most vehicle types.

8.13 **Outcome:** No change in GM Clean Air Plan Policy, the implementation of the GM CAP will not be delayed although some vehicles will be eligible for temporary exemptions to 31 May 2023 which will allow them more time to prepare for the scheme. GM authorities have a legal duty to implement measures which will achieve compliance with the relevant EU Limit Value within the "shortest possible time".

8.14 **Clean Air Zone Boundary – the boundary is too large**

8.14.1 **Issue:** Comments were received relating to the size of the CAZ, with respondents suggesting that the zone should only cover the area inside the M60, or Manchester city centre, or localised areas with poor air quality.

8.14.2 **Response:** Modelling undertaken by GM has shown that NO_2 concentrations are predicted to exceed the legal Limit Value in all 10 Greater Manchester local authorities. A such, a comprehensive plan for the whole of Greater Manchester is required, in recognition that travel and emissions are not confined within district boundaries. Whilst comments have been reviewed, the GM CAZ boundary will not be reduced to cover only central or localised areas, in order to improve air quality across the city-region and meet compliance across the 10 local authorities in the shortest possible time.

8.14.3 All 10 GM local authorities are now subject to a ministerial direction requiring them to implement a charging CAZ Class C across the region in order to achieve compliant levels of NO_2 concentrations in the shortest possible time and by 2024 at the latest, providing considerable health benefits at the lowest cost to society and the economy.

8.14.4 Transport modelling has shown that whilst a large volume of traffic is associated with accessing urban centres, there is also significant use of the local road network to access the motorway for trips spread around Greater Manchester and beyond.

8.14.5 A GM-wide approach will also avoid displacement, which could occur if action was undertaken in some districts and not others. Exclusion of some areas of GM could potentially cause changes in travel behaviours and worsen the situation in the areas that are excluded from the zone.

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8.14.6 **Outcome:** No change in GM Clean Air Plan Policy, the GM-wide approach set out in the Options Appraisal Report[54] was the scheme which would deliver compliance across Greater Manchester in the shortest possible time.

8.15 **Clean Air Zone Boundary - certain roads/areas should be included or excluded from the zone**

8.15.1 **Issue:** A number of respondents suggested that certain roads or areas should be included or excluded from the zone. These are summarised later in this section.

8.15.2 **Response:** The specific roads and areas highlighted in the consultation responses have been assessed. The boundary must be strategically coherent and understandable by scheme users and the wider public. In addition, setting of the boundary should avoid unintended consequences to impacted groups. This principle enables a fair and consistent approach to the zone boundary, whilst retaining a logical zone area that enables compliance to be achieved within the shortest possible time and enables simple marketing and communications messaging.

8.15.3 **Outcome:** In accordance with this, the sections of the A575 and A580 in the area of Worsley, which were previously excluded at consultation, is now proposed to be included in the zone and this will be the subject of a separate consultation. These sections were originally excluded as the strategic approach to signing the Strategic Road Network (SRN) in this location was initially anticipated to be challenging and costly, impacting on timescales for delivery and achieving compliant levels of NO_2. An alternative solution to signing the SRN across GM has now been identified by Highways England, which is deliverable in Spring 2022 and enables the inclusion of highway links in the Worsley area, subject to consultation later in 2021.

8.15.4 Exclusions from the zone – the suggestions for exclusions to the zone are summarised in the following paragraphs, along with the assessment of how each exclusion would align with the principles of a fair, consistent and easily communicable zone boundary.

8.15.5 It was suggested that access to Manchester Airport should be excluded from the zone so as to provide a charge-free route to the airport for drivers from outside of GM. Excluding the access would create economic issues as non-Greater Manchester businesses would have preferable access to the airport over GM business, who exist within the CAZ and therefore, if had non-compliant vehicles would be subject to a charge.

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[54] https://assets.ctfassets.net/tlpgbvy1k6h2/uCbNfiDpTY49uAUTFEzVO/b3ae7ceb4e8be0dcb36008fba4939ce9/Options_Appraisal_Report.pdf

8.15.6 It was suggested that the Trafford Park area should be excluded from the zone on the basis that there are minimal residential areas in this location and this is an area where people go to work. However, the exclusion of the Trafford Park area could impact on the ability to achieve compliance in the shortest possible time because the majority of access routes are in exceedance in the Do Minimum scenario. Compliance with the Limit Values (unlike UK Air Quality Objectives) is not defined by the prevalence of residential exposure, only locations where public access is possible. As well as this, excluding this area would have social, economic and equality implications for those who are employed in the area or visit it, who would not get the benefit of air quality improvements.

8.15.7 It was suggested that the local roads within the Woodford area in Stockport should be excluded from the zone due to potential re-routing impacts on local traffic between destinations within Cheshire East. However, the area of Woodford is part of Stockport in Greater Manchester and the ministerial direction applies to all GM local authorities. All local authorities within GM have areas of exceedance that need to be addressed and excluding this area would unfairly impact the health benefits to local residents as they would not benefit in the same way as the rest of GM.

8.15.8 It was suggested that the East Lancs Road from central Salford should be excluded from the zone due to the view that this is a major roadway into Manchester from Merseyside and including it would cause a diversion of traffic onto the motorway network at the border of the CAZ. However, the modelling[55] identified that sections of the East Lancs Road are predicted to be in exceedance of legal limits. It should also be noted that the majority of in-scope vehicles using the East Lancs Road would have an origin or destination in GM and would therefore be subject to a charge at some stage of their journey, so re-routing at the border would not help avoid the charge.

8.15.9 Suggestions were made that the zone should only focus on perceived ‘problem areas’ and should be more targeted, in a similar theme to the comments on the size of the boundary. However, and as described in the section addressing the size of the GM CAZ boundary, the ministerial direction applies to all GM local authorities, which all have areas of exceedance that need to be addressed. The optioneering process demonstrated that options with targeted CAZ boundaries at exceedance links or around urban centres do not deliver compliance in the shortest possible time.

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[55] Document AQ3 can be found at: https://cleanairgm.com/technical-documents

8.15.10 It was suggested that routes to motorway junctions from neighbouring authorities be excluded from the zone on the basis that without this exclusion, drivers from just outside the GM boundary could take further/longer routes in order to join the motorway network outside of GM. Whilst this comment is understood, removing access routes within GM would unfairly impact the health benefits of residents in these areas, as they would not benefit in the same way as the rest of GM. It should also be noted that this would only apply to those accessing the motorway whose destination is outside of GM, otherwise they would still be charged, if the vehicle is non-compliant, when entering GM.

8.15.11 There was a suggestion that the foothills of the West Pennine Moors and Peak District be excluded from the zone, due to the perceived view that these were not problem areas. However, exceedances have been identified across GM and air pollution is not constrained by specific road boundaries. Whilst the exact location of the CAZ boundary on the GM border is not likely to alter compliance overall, the Options Appraisals Process demonstrated that options with targeted CAZ boundaries at exceedance links or around urban centres does not deliver compliance in the shortest possible time.

8.15.12 Inclusions to the zone – The suggestions for inclusions to the zone are summarised in the following paragraphs, where respondents suggested that the following roads/areas should be included within the zone due to concerns over pollution and traffic congestion in these areas. Details of the assessment and reasoning for those areas being excluded from the zone are also set out in the following paragraphs.

8.15.13 It was suggested that motorways should be included in the zone. However, the Strategic Road Network (motorways) is operated by Highways England, which is not subject to Ministerial Direction. The GM authorities are not able to implement charges on these roads.

8.15.14 It was suggested that a number of areas outside of the GM boundary should be included in the zone, including neighbouring authorities, Wilmslow, Disley, the A6 in Disley and the A6 to New Mills. However, these areas are outside of the GM boundary and are therefore not subject to the ministerial direction. In addition, these areas are outside the jurisdiction of the GM authorities and they are not able to implement charges on these roads.

8.15.15 Comments were received relating to the inclusion of the A628/A57/Woodhead Pass/Mottram. On 9 June Ministers wrote to the Leader of Tameside MBC to advise that following consideration of assessment provided by Highways England, Ministers have agreed to the inclusion of the identified section of the A57 and A628, which form part of the Strategic Road network in Tameside, within the Greater Manchester charging Clean Air Zone and that Government will work collaboratively with Tameside MBC, TfGM and Highways England to establish the most appropriate solution for the charging mechanism to be applied on this section of the Strategic Road Network within the current legislation and timeframe available..

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8.15.16 Suggestions were made that Manchester city centre should be a ULEZ. This has been responded to in paragraphs 7.4 and 7.5.

8.15.17 Suggestions were made to include all of the A555, which is located in the GM authorities of Stockport and Manchester and the neighbouring authority of Cheshire East. The current proposal is to include the A555 within GM, with the exception of a small stretch from the junction with the B5166 in the west to the junction with A523 in the east (from Styal Road to the Macclesfield Road junction) within the GM CAZ. This is to enable movements between Poynton and Handforth (which are towns located in the district of Cheshire East and therefore outside of GM), to continue uncharged, given the expectation that implementing a charge would result in local journeys returning to the roads that the A555 was designed to reduce. With regards to the stretches of the A555 within Cheshire East, these are outside of the GM boundary and therefore not subject to the ministerial direction and are outside the jurisdiction of the GM authorities.

8.15.18 Comments were also received suggesting that the B5328 in Wigan, Deane Road and Derby Street in Bolton, and all roads in Greater Manchester where there is are residents should be included in the zone. These roads are already included in the zone (with the exception of motorways, the A628/A57 SRN highway route in Mottram and sections of the A555, as noted above).

8.15.19 **Outcome:** No change in GM Clean Air Plan Policy, the GM-wide approach to the boundary will be maintained.

8.16 **Clean Air Zone Boundary – concerns about negative impacts of traffic redistributing at/near the boundary**

8.16.1 **Issue:** Concerns were raised around the potential for the zone to negatively impact those based on or near the GM boundary if non-compliant vehicles move into neighbouring areas to avoid CAZ charges and vehicles stop and re-route outside of the boundary causing disruption and congestion and further air pollution.

8.16.2 **Response:** Modelling carried out in the GM CAP Study Traffic Impact on Neighbouring Authorities[56], showed that the CAZ is not anticipated to have a significant impact on traffic flows on roads in the surrounding area. Whilst the impacts may vary by location depending on the level of interaction with GM and flows of non-compliant vehicles, there is very limited availability of diversion routes, and the regional nature of the GM CAZ means that for the most part the origin or destination of a trip will lie within the zone so re-routing at the border would not help avoid a charge.

8.16.3 The opportunity to avoid entering the zone (for example allowing turn around on a roundabout) was considered as one of the critical factors for boundary designs and sign locations.

[56] https://assets.ctfassets.net/tlpgbvy1k6h2/4GHuHasUCnfny6oRfINHKu/1fc85978e017bebaf47cb95bc1e72dfc/GM_CAP_Study_Traffic_Impact_on_Neighbouring_Authorities.pdf

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8.16.4 **Outcome:** No change in GM Clean Air Plan Policy, it is likely that the scheme will deliver air quality improvements on routes to and from the region which will provide air quality benefits in the surrounding districts. More information is available in the Strategic Case of the Outline Business Case[57].

8.17 **Clean Air Zone – Hours of operation – the CAZ should not operate 24 hours a day, 7 days a week**

8.17.1 **Issue:** A number of respondents suggested certain times should be excluded from the charging period, namely evening/night time, off-peak hours and weekends.

8.17.2 **Response:** It has been concluded that reducing the operational period to anything less than 24 hours a day, 7 days a week, could impact on the ability to achieve compliant levels of NO_2 in the shortest possible time, and by 2024 at the latest. This is due to a number of factors in relation to both the delivery and operation of the scheme.

8.17.3 The modelling for the Consultation Option indicates that the GM CAZ delivers compliance in 2024 (the shortest possible time identified in the OBC and the date set in the ministerial direction). However, any relaxation of proposed measures, including changes to the operational hours below 24/7, 7 days a week, could reduce the performance of the scheme and risk delaying the point of compliance.

8.17.4 Based on the Government Clean Air Zone Framework (February 2020 section 3.7)[58], it is assumed that a Clean Air Zone would operate constantly, although if a local authority can demonstrate that it will still achieve compliance with air quality limit values in the shortest possible time by operating on a reduced hours basis, it could propose such a scheme. This means the default position is 24/7 operation and the only reason to deviate from this would be if modelling shows that shorter hours would bring the air quality within Greater Manchester within the limits in an equal or shorter time.

8.17.5 A reduction in the hours of operation brings the potential for behaviour change, as the use of non-compliant vehicles could increase at the excluded day/time, adversely impacting air quality and resulting in it taking longer to achieve compliant NO_2 levels as well as potentially imposing negative impacts on residents such as increased night-time traffic.

8.17.6 Consistency with all other Clean Air Zone schemes (Birmingham, London ULEZ, Bath etc.), simple marketing and communications messages and potential safety issues with drivers waiting outside the zone boundary for free periods are other factors that support 24/7 operation.

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[57] https://assets.ctfassets.net/tlpgbvy1k6h2/3UC4AhiPenRw3hdKjTYHTq/2fb88ead100e042bf756d0562b977266/Strategic_Case.pdf
[58] Department for Environment, Food and Rural Affairs and Department for Transport. 2020. Clean Air Zone Framework. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/863730/clean-air-zone-framework-feb2020.pdf

8.17.7 It should also be noted that comments on the hours of operation were received from a range of respondents rather than one specific user group. Whilst the removal of specific time periods from the charge could benefit certain groups (such as hackney and PHV drivers, if evenings and weekends were not charged) this should be balanced against the wider health benefits - for all - of reducing NO_2 in the shortest possible time.

8.17.8 **Outcome:** No change in GM Clean Air Plan Policy, the hours of operation will remain 24 hours a day, 7 days a week.

8.18 **Clean Air Zone – Hours of operation – midnight should not be the transition time between 24-hour periods**

8.18.1 **Issue:** A number of respondents commented that midnight should not be the transition time between 24-hour periods, due to concerns around being charged twice for travel just before and after midnight.

8.18.2 **Response:** The ten GM local authorities considers that there is insufficient evidence of the balance of benefits to justify a change to the transition time. In addition, the significant re-design and associated timescales required to incorporate the change to the Government's CAZ Service would impact on the planned Go Live date and therefore the ability to achieve compliance in the shortest possible time.

8.18.3 Retaining the midnight transition time is consistent with all other CAZ schemes and helps enable simple marketing and communications messages.

8.18.4 **Outcome:** No change in GM Clean Air Plan Policy, the midnight to midnight will remain the transition time between the 24-hour periods.

8.19 **Operation of the GM Clean Air Zone – practicalities of how the GM Clean Air Zone will work**

8.19.1 **Issue:** Some respondents raised concerns and queries in relation to how the Clean Air Zone will operate in practice, including:

- How the GM CAZ will be enforced
- What methods will be used to track those entering into the CAZ
- How people will pay
- How non-UK registered vehicles will pay
- Next steps when air quality has improved

8.19.2 **Response:** Enforcement of the Greater Manchester Clean Air Zone will be undertaken in line with the prescribed process set out within Road User Charging Schemes (Penalty Charges, Adjudication and Enforcement) (England) Regulations 2013 (the Penalty Charges Regulations).

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8.19.3 The GM CAZ will use a network of automatic number plate recognition (ANPR) cameras to identify non-compliant vehicles. Where the ANPR system identifies non-compliant vehicles travelling in the GM CAZ and charges have not been paid, registered keepers will be notified of a liability to pay a Penalty Charge Notice (PCN) arising.

8.19.4 Registered keepers of non-compliant vehicles used within the GM CAZ will be required to pay the relevant charge via a Central Government Payment Portal.

8.19.5 Foreign registered vehicles liable for the charge will be able to pay to enter the GM CAZ through the Central CAZ payment service in the same way as UK registered vehicles. Any such vehicles that do not pay the charge will be issued with a Penalty Charge Notice where it is possible to obtain the registered keeper details from the country concerned.

8.19.6 It is anticipated that, once implemented, the Clean Air Zone will remain in full operation until at least the second half of 2026. In accordance with government advice, if it is demonstrated by the second half of 2026 that two consecutive years of compliance with the legal limit value for NO_2[59] has been met, and there is confidence that compliance will continue to be maintained, then subject to GM governance processes, the local authorities will notify the Secretary of State of their intention to revoke the Charging Scheme Order and decommission the GM CAZ.

8.19.7 **Outcome:** No change in GM Clean Air Plan Policy.

8.20 **The charges in the GM CAZ should vary by time of day or should be higher in peak times**

8.20.1 **Issue:** Some respondents suggested that the charge levels should vary by time of day, with a particular note on discouraging travel at peak times.

8.20.2 **Response:** There are several reasons why time-based charges would not be appropriate for the GM CAZ:

- This is not a congestion charging scheme - the focus of the scheme is to reduce NO_2 concentrations to within the legal limit value, not to reduce congestion and it is not intended to directly influence travel behaviours across the day.
- Time-based charging could result in peak spreading which could result in different emissions hot spots due to changing traffic flows and routing which that be undesirable.
- Peak times can vary between vehicles types and location, therefore not all emissions exceedances are solely generated by peak based travel.

[59] The EU Ambient Air Quality Directive set the Legal Limit value of an annual mean of 40ug/m3, which was transposed into UK legislation under the Air Quality Standards Regulations 2010. The requirement to meet compliance with the legal limit is set out by the Environment Act 1995 (Greater Manchester) Air Quality Direction 2020. Under this direction the GM Authorities are obliged to meet the Legal Limit.

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- Emissions levels can still be expected to be high outside of peak periods.

8.20.3 **Outcome:** No change in GM Clean Air Plan Policy, the charges for each vehicle will not change from the charges in the consultation.

8.21 **The charges are too low, particularly for LGVs**

8.22 **Issue:** Some respondents commented that the charge levels were too low and would not be effective. In particular, ClientEarth considered that to the extent that higher charges are likely to lead to either (a)(an earlier overall compliance date, or (b) a route to compliance that reduces human exposure to pollution more quickly, higher charge levels must be adopted as part of the final CAZ plans if they are to satisfy the necessary legal requirements. ClientEarth considered that the analysis also shows that by further increasing the charge for LGVs to £12.50, the "stay and pay" response could be reduced by a further 15%. They also considered thato given the extent that a higher LGV charge would lead to more rapid pollution reductions, it would need to be included in the Councils' final plan.

8.22.1 **Response:** A review of charge levels was undertaken for each vehicle type in Autumn 2019 to support the development of the Option for Consultation[60]. This was based on setting the charge levels high enough to achieve compliance. Results of tests to assess the optimal charge levels for a Greater Manchester Clean Air Zone[61] provided consideration for alternative charge levels. These tests support that the charge levels selected have been identified to generate a high upgrade response across all modes. Higher charge levels were not found to generate significant additional upgrade responses and would impose additional costs without bringing additional air quality benefits. The GM CAP charge levels were also benchmarked against the CAZ charges identified by other cities and were broadly comparable.

8.22.2 Client Earth suggested in their feedback, based on Technical Note 31, that the charges for LGVs were too low and that a higher charge of £12.50 would be more effective, reducing the 'stay and pay' response by 15%. They also suggested that there was also a discrepancy in the analysis published by GM between Technical Note 31 and T4 (Option for Consultation), in that Note 31 suggested 70% of LGVs would upgrade with a £10 charge (in Figure 1) and T4 showing that 95% of LGVs are forecast to be compliant (in Table 15).

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[60] Available as Technical Note 31 at Note 31 - GM CAP Results of Tests to Assess the Optimal Charge Levels for a GM Clean Air Zone (ctfassets.net)

[61] https://assets.ctfassets.net/tlpgbvy1k6h2/77frjZSgdKGLiyDwCUrmey/f8aa8a3c7622a89dd9ed240f39d0b283/31_-_GM_CAP_Charge_Level_Sensitivity_Testing.pdf

8.22.3 It is important to note that Figure 1 in Note 31 relates to vehicles whilst Table 15 in T4 relates to traffic. Table 15 in T4 includes all vans, including those that were compliant in the Do Minimum scenario (therefore a higher proportion will be compliant in total), and as stated above, Table 15 in T4 presents the impact of the full Option for Consultation (and so presents the impact of the charge in combination with the Funds) whereas Note 31 considers the impact of the charge in isolation. The numbers in Figure 1 of Note 31 and Table 15 of T4 are therefore not directly comparable and would not be expected to be the same.

8.22.4 The analysis presented in T4 is based on a later version of the Commercial Vehicle Cost Model (from October 2019 rather than August/September 2019) so the behavioural responses generated had changed slightly between the two analyses. Note 37 provides a useful summary of the behavioural responses by vehicle type as per the final modelling of the Option for Consultation[62].

8.22.5 Modelling of the Policy for Consultation, as set out in T4 (Option for Consultation)[63], suggested that, with CAZ charges set at £10 per day and the Funds as proposed at consultation, 85% of non-compliant LGVs would choose to upgrade in 2023 and 86% in 2025.

8.22.6 In the updated modelling of the Policy following consultation, there is a proportion of the fleet that has been presumed not to upgrade in any event, as a result of the Covid-19 pandemic. With the impacts of Covid-19 and the post-consultation Policy, 79% of non-compliant LGVs are forecast to choose to upgrade in 2023 and 84% in 2025. Overall, this means that the vast majority of LGVs on the road would be compliant from 2023 onwards (around nine in ten by 2025). Such is the extent of the upgrade of the fleet that any further benefits from higher charges are likely to be minimal.

8.22.7 **Outcome:** No change in GM Clean Air Plan Policy, the charges for each vehicle will not change from the charges in the consultation.

8.23 **The daily charge should vary by emissions standards/size of vehicles**

8.23.1 **Issue:** There were suggestions that it would be fairer to charge vehicles based on the volume of their emissions (for example, based on mileage travelled) or based on the types of vehicles making these journeys (such as vehicle size, within a CAZ vehicle type category).

8.23.2 **Response:** The CAZ is not designed to monitor the emissions of vehicles by mileage, as the proposals are consistent with the Government's Clean Air Framework[64] and will not track the individual journeys of all vehicles through the CAZ. The current proposals ensure consistency of approach across the UK Clean Air Zones.

[62] Vehicle Population Estimates Note (37) (ctfassets.net)
[63] GM CAP Option for Consultation - Local Plan Air Quality Modelling Tracking Table (T4) (ctfassets.net)
[64] https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/863730/clean-air-zone-framework-feb2020.pdf

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8.23.3 **Outcome:** No change in GM Clean Air Plan Policy.

8.24 **The CAZ doesn't charge all vehicles, only those caught by a CAZ C that do not comply with the required emissions standards.**

8.24.1 **Issue:** Comments that the CAZ doesn't charge all vehicles, only those caught by a CAZ C that do not comply with the required emissions standards. Comments were also raised around different charges for different sizes of vehicles.

8.24.2 **Response:** The GM CAP already has different CAZ charges for different vehicle types. The vehicle charging levels are set at the Euro Category level for vehicle types (as defined in government guidance around the CAZ minimum classes and standards). This means that alternative charging levels within these categories would not be possible and would not align with the Government's Clean Air Framework.

8.24.3 **Outcome:** There will be no changes to charges based on mileage travelled or sub-categories of vehicle types.

8.25 **Charge levels are too high**

8.25.1 **Issue:** Some respondents suggested that the charge levels for the CAZ are too high. This was a suggestion that was noted for several vehicle types, with vehicle owners, in particular, concerned about high charges.

8.25.2 **Response:** The GM CAZ charge levels are designed to encourage vehicle upgrade to compliant vehicle types to ensure improvements in air quality. Without a sufficiently high level of charge, as a deterrent to doing nothing, the behavioural change needed to improve air quality levels required by GM CAP would not be achieved.

8.25.3 In Autumn 2019 a review of charge levels was undertaken to review the appropriate charge levels for each vehicle types to support the development of the Option for Consultation. This was based on setting the charge levels high enough to achieve compliance. Technical Note 31 sets out the results of tests to assess the optimal charge levels for a Greater Manchester Clean Air Zone[65] and provided consideration of alternative charge levels.

8.25.4 The review concluded that the identified charge levels were considered appropriate to achieve the required level of behavioural change and that reducing the CAZ charge would result in additional 'Stay and Pay' response (meaning that non-compliant vehicle owners would pay the charge rather than upgrade their vehicle(s)). This would not deliver the air quality improvements required by GM CAP and resulting in additional costs for vehicle owners.

8.25.5 It is considered that this remains the case and therefore the daily charges for each vehicle type have not been reduced.

[65] Technical Documents | Clean Air Greater Manchester (cleanairgm.com)

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8.25.6 The ten GM local authorities acknowledge feedback from the consultation and evidence from the research into COVID-19 impacts that vehicle owners need more support to comply with the charge, and this is reflected in other changes to the Policy. It is considered that these measures will better mitigate the impacts of the CAZ than reduced charges, and will ensure GM can meet the objectives to improve air quality across Greater Manchester.

8.25.7 **Outcome:** No change in GM Clean Air Plan Policy, the daily charges for each vehicle type will remain the same as at consultation.

8.26 **The daily charge for buses is too high**

8.26.1 **Issue:** A number of respondents felt the charge for non-compliant buses was too high. There was also concern from the general public around charges being passed onto bus users.

8.26.2 **Response:** Buses are considerable contributors of NOx emissions. In GM, buses emit in the region of 8% of the net NOx vehicle emissions overall. In the Regional Centre, bus emissions are predicted to produce 62% of total NOx emissions in 2023, without the GM CAP in place. Therefore, it is important to have a compliant bus fleet in GM, to improve air quality.

8.26.3 Lower charges than those proposed at consultation mean more vehicles are likely to stay and pay, with no air quality benefits.

8.26.4 The ten GM local authorities are seeking funding towards upgrade costs to support the upgrade of all non-compliant buses currently operating in GM. It aims to support the upgrade of all buses in this group and so they would not incur the charge. The sector is supported through the Clean Bus Fund. This funding supports the cost for bus retrofit (£16,000), or £16,000 towards bus replacement, to ensure that all buses within GM have support to upgrade, to avoid having to pay the CAZ Charge.

8.26.5 **Outcome:** No change in GM Clean Air Plan Policy, the daily charge for non-compliant buses will remain the same as at consultation.

8.27 **The daily charge for coaches is too high**

8.27.1 **Issue:** A number of respondents thought the charges for coaches were too high.

8.27.2 **Response:** In Autumn 2019 a review of charge levels was undertaken to review the appropriate charge levels for each vehicle types and resulted in the reduction of the daily coach/bus/HGV charge from £100 to £60.

8.27.3 Lower charges than those proposed at consultation mean more vehicles are likely to stay and pay, with no air quality benefits.

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8.27.4 The consultation feedback would suggest that owners of non-compliant coaches may struggle to upgrade their vehicles in response to GM CAP due to the pandemic. To mitigate this the temporary exemption has been extended to 31 May 2023 for all coaches and funding support for coaches have been improved, which better meets the objectives of improving air quality.

8.27.5 **Outcome:** No change in GM Clean Air Plan Policy, the daily charge for non-compliant coaches will remain the same as at consultation.

8.28 **The daily charge for HGVs is too high**

8.28.1 **Issue:** A number of respondents felt the £60 charge for HGVs was too much.

8.28.2 **Response:** In the Public Conversation in 2019 there was feedback to say that the original charge of £100 per day for HGVs was too high. Later in 2019 a review of charge levels was undertaken. The data and modelling that underpins the development of the GM CAP has been significantly updated, as set out with regards to HGVs in Technical Notes 3, 7, 8 and 20 produced in 2019[66]. In the analysis used to assess the effectiveness of different charge levels for HGVs, a CAZ charge set at £60 per day was shown to deliver very similar upgrade responses and benefits to compliance as a charge of £100. £60 was assessed to be the lowest possible charge delivering equivalent benefits. This resulted in the reduction of the daily coach/bus/HGV charge from £100 to £60.

8.28.3 Lower charges than those proposed at consultation mean more vehicles are likely to stay and pay, with no air quality benefits.

8.28.4 The consultation feedback would suggest that some owners of non-compliant HGVs may struggle to upgrade their vehicles. To mitigate this the funding support for HGVs has been enhanced, with larger grants per vehicle now available, which better meets the objectives of improving air quality.

8.28.5 **Outcome:** No change in GM Clean Air Plan Policy, the daily charge for non-compliant HGVs will remain the same as at consultation.

8.29 **The daily charge for HGV leisure vehicles is too high**

8.29.1 **Issue:** Some respondents felt that the daily charge for HGV leisure vehicles was too high, particularly those who own a HGV leisure vehicle.

8.29.2 **Response:** In Autumn 2019 a review of charge levels was undertaken to review the appropriate charge levels for each vehicle types and resulted in the reduction of the daily coach/bus/HGV charge from £100 to £60.

[66] All available at Technical Documents | Clean Air Greater Manchester (cleanairgm.com)

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8.29.3 The GM CAP recognises the need for parity of treatment of vehicles used for leisure purposes, such that vehicles should be charged at the same rate regardless of size. This is reflected in the Private HGV Tax Class vehicle discount, which offers a discounted charge to £10 for vehicles in the DVLA Private HGV Tax Class to provide parity of treatment of these vehicles.

8.29.4 **Outcome:** Change in GM Clean Air Plan Policy. The previous discount for leisure vehicles in private ownership that are over 3.5t has been amended to all vehicles classified under the Private HGV tax class to be eligible for a discounted charge of £10 per day, rather than £60.

8.30 **The daily charge for LGVs and minibuses is too high**

8.30.1 **Issue:** Under the GM CAP proposals, non-compliant LGVs and minibuses will be subject to a £10 charge. Some respondents identified that the CAZ charge for LGV was too high.

8.30.2 **Response:** As previously explained, a review of charge levels was undertaken in Autumn 2019. The analysis showed that even at a £10 charge, a reasonably high level of 30% stay and pay response was expected, with the proportion choosing to upgrade increasing with the provision of funding support. This analysis showed that reducing the CAZ charge for LGVs and minibuses would result in a substantial increase in the 'Stay and Pay' response with over 50% forecast to stay and pay if the charge was reduced to for example £7.50.

8.30.3 Evidence from the latest modelling of the post-consultation Policy shows that around a fifth of LGV and minibus owners are choosing to 'stay and pay' with a charge of £10 per day in 2023. It would not be possible to reduce the charge for LGVs or minibuses without reducing the effectiveness of the scheme. Rather than reducing the daily charge, a temporary exemption to 31 May 2023 for LGVs and minibuses and increase in the amount of funding per vehicle for larger LGVs are more suitable revisions to the scheme to meet the air quality objectives.

8.30.4 **Outcome:** No change in GM Clean Air Plan Policy, the daily charge for non-compliant LGVs and minibuses will remain the same as at consultation.

8.31 **The daily charge for hackney carriages and private hire vehicles (PHVs) are too high**

8.31.1 **Issue:** A number of respondents felt the charge of £7.50 was too high for both Hackneys and PHVs, in light of the pandemic and economic issues in the sector. There were also several comments in relation to passing on the charge to customers, a concern raised by the public.

8.31.2 **Response:** As previously mentioned, a review of the CAZ charges for each mode was undertaken in 2019, which assessed the impact of varying charge levels. Reducing the charge would increase the number of non-compliant vehicles which would stay and pay, without delivering air quality benefits so improving support is a better mitigation.

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8.31.3 Rather than reducing the daily charge, a temporary exemption to 31 May 2023 for all GM-licensed Hackney Carriages and PHVs and further options for replacement and retrofit are more suitable revisions to the scheme to meet the air quality objectives.

8.31.4 **Outcome:** No change in GM Clean Air Plan Policy, the daily charge for non-compliant hackney carriages and PHVs will remain the same as at consultation.

8.32 **Charges should apply to M1 vehicles with a body type of 'motorcaravan'.**

8.32.1 **Issue:** Feedback through consultation and discussion with other cities implementing a CAZ C (e.g. Bath) has highlighted a group of vehicles with a body type of 'motorcaravan' and a vehicle type approval of M1 (or M1 Special Purpose). These vehicles are currently not liable to pay the CAZ charge. Furthermore, feedback has also highlighted that in some cases there may not be a recorded vehicle type approval for the vehicle in DVLA records; in such cases the body type may need to be used to determine if a CAZ charge is to be paid. Consultation feedback has highlighted the lack of parity of treatment of vehicles with a body type of 'motorcaravan' and a vehicle type approval of M1 (or M1 Special Purpose) against vehicles with a body type of 'motorcaravan' that have a vehicle type approval of N1 or N2, which are currently liable for a charge under the GM CAZ scheme.

8.32.2 **Response:** It is estimated that there are over 4,000 non-compliant vehicles with a body type of 'motorcaravan' in GM, the majority of which would be liable to pay the daily charge. The GM CAP proposals recognise the need for parity of treatment of vehicles used for leisure purposes. This is reflected in the Private HGV Tax Class vehicle discount, which offers a discounted charge to £10 for vehicles in the DVLA Private HGV Tax Class to provide parity of treatment of these vehicles, which include vehicles with the body type of 'motorcaravan'.

8.32.3 A category C CAZ does not apply charges to M1 (or M1 Special Purpose) group of vehicles with a body-type of 'motorcaravan'. However, there is a lack of parity between this classification of vehicle and vehicles with a body type of 'motorcaravan[67]' that have a vehicle type approval of N1 or N2, which are currently liable for a charge under the GM CAZ scheme.

8.32.4 **Outcome:** To ensure the principle of parity of treatment of all vehicles with body type of 'motorcaravan' It is recommended that that a consultation is held on the inclusion of motorhomes classified as M1 Special Purpose in the GM Clean Air Zone.

8.33 **All exemptions should be temporary or regularly reviewed**

[67] This information is recorded in DVLA records.

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8.33.1 **Issue:** Of those that gave a comment, about a fifth of businesses and a similar proportion of the general public gave a comment opposing the exemptions in general. Some felt that the exemption should only be a temporary measure to provide those affected with more time to upgrade. Some felt that the permanent local exemptions were not needed and that vehicles should have been upgraded already. Others stated that no vehicles should be exempt because cleaner air needs to be a priority.

8.33.2 **Response:** Some permanent exemptions are nationally stipulated, because some types of vehicle are engaged in unique or novel operations or are particularly difficult or uneconomic to adapt to comply with the Government's Clean Air Framework requirements. Under the Government's Clean Air Framework, further local exemptions and discounts can be proposed where appropriate so long as they do not undermine GM's ability to achieve compliance "in the shortest possible time".

8.33.3 Local discounts and exemptions as part of the GM CAP have been carefully considered to address discrete and specific issues, for example where it may generally not be practical to upgrade to a vehicle compliant with the emission standards of the GM CAZ or to provide protection to particularly vulnerable groups based upon protected characteristics. As guided by the Government's Clean Air Zone Framework, Greater Manchester has constrained the permanent exemptions offered. The current exemptions are considered proportionate. The proposed local permanent and temporary exemptions are not expected to change the date of compliance. The GM CAP monitoring and evaluation plan will be designed to enable evaluation of the scheme performance and the GM Clean Air Charging Authorities Committee has the authority to vary the Charging Scheme Order, which includes the varying and/or setting of discounts and exemptions if this is deemed necessary to comply with legal limits.

8.33.4 **Outcome:** No change in GM Clean Air Plan Policy offering permanent and temporary exemptions.

8.34 **Concerns around enforcement/abuse of permanent exemptions**

8.34.1 **Issue:** Some respondents expressed concerns about the potential for bending or breaking the rules to register vehicles for exemption from the charge and wanted to make sure there was sufficient enforcement to prevent this.

8.34.2 **Response:** The GM CAP Policy and procedures will take account of the concerns raised about enforcement and abuse by setting out robust eligibility criteria and evidence requirements, which need to be met before an exemption is granted. In addition, the service overseeing the administration of discounts and exemptions will have a robust monitoring and enforcement process including regular checks being made on the administration of discounts and exemptions. This is designed to ensure the continued suitability/robustness of requirements/evidence for discounts and/or exemptions, to reduce the risk of abuse and to address abuse where it is identified.

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8.34.3 **Outcome:** No change in GM Clean Air Plan Policy regarding the enforcement/abuse of permanent exemptions. However, consultation feedback highlighting potential areas for abuse will inform the development of procedures to seek to avoid abuse of exemptions.

8.35 **Private leisure vehicles should be permanently exempt**

8.35.1 **Issue:** Consultation feedback suggested private leisure vehicles which are HGVs are considered too expensive to upgrade and so they should be permanently exempt from the charge.

8.35.2 **Response:** It is considered that, rather than a permanent exemption, this issue should be addressed through changes to the permanent local discount for all vehicles classified under the Private HGV tax class to be eligible for a discounted charge of £10 per day. This is to ensure there remains an incentive for owners of private leisure vehicles to upgrade those vehicles and to discourage use of polluting vehicles for day-to-day travel.

8.35.3 **Outcome:** No change in GM Clean Air Plan Policy, private leisure vehicles will not be permanently exempted from the CAZ.

8.36 **Vehicles used by disabled users should be permanently exempt**

8.36.1 **Issue:** Feedback highlighted a group of disabled users whose vehicles would not be covered by the current discounts and exemptions offered. Feedback suggested including a further exemption to cover disabled people travelling in any vehicles, linked to Blue Badges.

8.36.2 **Response:** Feedback from the consultation presented evidence that there are some disabled people whose vehicles do not qualify for the DVLA Disabled Tax Class due to its link to PIP and Motability. The majority of consultation respondents support exemptions for vehicles exclusively used by disabled users.

8.36.3 The impacted group in question is likely to be a small population of disabled users using vehicles that are privately owned LGVs or minibuses that are specially adapted for a disabled user but do not qualify for the Disabled Tax Class.

8.36.4 **Outcome:** Change in GM Clean Air Plan Policy, there will be a permanent exemption for privately owned LGV or minibuses, where they are specially adapted for use by a disabled user, which is not covered by the Disabled Vehicle Tax Class. Owners or registered keepers of eligible LGVs and Minibuses adapted for a disabled user need to apply for this exemption, as there is no national database of these vehicles.

8.37 **Buses should be permanently exempted from the CAZ**

8.37.1 **Issue:** Some respondents felt that buses should be exempt as public transport usage helps towards clean air; and if buses were charged comments expressed concern that the charges would be passed down to the public, deterring the use of buses, when it should be encouraged.

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8.37.2 **Response:** A permanent exemption for buses would remove the incentive to upgrade to compliant vehicles. The upgrade of non-compliant buses is central to the Government's Clean Air Framework, which identifies buses as Class A vehicle type, therefore included in any CAZ type and could not be permanently exempted as a vehicle type.

8.37.3 The Data Evidence and Modelling: Consultation Summary Report[68] sets out that at some sites in Greater Manchester emissions from buses account for 29% of emissions. Buses have much higher emission rates than other vehicle types and therefore have a disproportionate impact on air quality levels relative to their overall contribution to the total traffic flow. They also deliver the greatest benefit in terms of emissions reductions when switching from a non-compliant to a compliant vehicle.

8.37.4 It is considered that bus replacement and retrofit through the funding support measures within the GM Clean Air Plan would better meet the air quality objectives.

8.37.5 **Outcome:** No change in GM Clean Air Plan Policy, buses will not be offered a permanent exemption.

8.38 **Hackney carriages and PHVs should be permanently exempt**

8.38.1 **Issue:** Some respondents to the consultation commented that hackney carriages and PHVs should be permanently exempt. Comments were also made that some vehicles are licensed as wheelchair accessible vehicles and so should have a permanent exemption on these grounds.

8.38.2 **Response:** A permanent exemption for Hackney Carriages and PHVs would remove the incentive to upgrade to compliant vehicles. The upgrade of these non-compliant vehicles is central to the Government's Clean Air Framework[69], which identifies taxis as Class A vehicle type, therefore included in any CAZ type and could not be permanently exempted as a vehicle type.

8.38.3 The Data Evidence and Modelling: Consultation Summary Report[70] sets out that the modelling for compliance with air quality requirements requires upgrade of Hackney Carriages and PHV, making the upgrade of these vehicles a central requirement to meet NO_2 compliance in GM. Hackney Carriages and PHV operate for much longer periods of time on an average day than some other modes and therefore have a disproportionate impact on air quality levels relative to their overall contribution to the total traffic flow. The drivers of non-compliant hackneys and PHVs are particularly at risk of the effects of poor air quality, including from the vehicles they are travelling in.

[68] https://images.ctfassets.net/tlpgbvy1k6h2/6WlPEVFCSUb1rYQHXn4EYv/8b327d3e47aff8480643f8ccd1e48fbd/Data_Evidence_and_Modelling_-_Consultation_Summary_Report.pdf

[69] https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/863730/clean-air-zone-framework-feb2020.pdf

[70] https://images.ctfassets.net/tlpgbvy1k6h2/6WlPEVFCSUb1rYQHXn4EYv/8b327d3e47aff8480643f8ccd1e48fbd/Data_Evidence_and_Modelling_-_Consultation_Summary_Report.pdf

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8.38.4 Rather than permanently exempting this vehicle class, a temporary exemption to 31 May 2023 for all GM-licensed Hackney Carriages and PHVs and further options for replacement and retrofit are more suitable revisions to the scheme to meet the air quality objectives.

8.38.5 **Outcome:** No change in GM Clean Air Plan Policy, there will not be a permanent exemption for all Hackney Carriages and PHVs.

8.39 **Other vehicles should be permanently exempt**

8.39.1 **Issue:** A small number of comments were received about other vehicle types and groups who should be permanently exempted from the CAZ. These groups included GM residents, specialist vehicles, vans/LGVs and HGVs, coaches and minibuses. Some comments requested exemptions for sole traders/smallest businesses. Comments were also received from neighbouring local authorities, who requested exemptions for some specialist vehicles such as cleansing, refuse, highway maintenance and community minibuses that are operating in GM and provide valuable services. A number of consultation responses requested further clarity on the nature of vehicles covered by the Specialist HGV exemption.

8.39.2 In addition, there were comments suggesting that driver training buses should be exempt because they are specially adapted for and dedicated to driver training and it is unlikely that they can be retrofitted.

8.39.3 **Response:** As guided by the Government's Clean Air Zone Framework, Greater Manchester has constrained the temporary and permanent exemptions offered. The current exemptions are considered proportionate. The proposed local permanent and temporary exemptions are not expected to change the date of compliance.

8.39.4 It would not be possible to permanently exempt large groups of vehicles that contribute substantially to NO_x emissions and that are included within the Government's Clean Air Framework[71] such as all vans, HGVs, coaches and minibuses, or all vehicles owned by GM residents or small businesses which constitute a substantial proportion of the non-compliant vehicle fleet without reducing the effectiveness of the scheme and delaying compliance.

8.39.5 The consultation feedback highlights a number of vehicle types where the descriptions of exemptions at consultation were not explicitly clear on which vehicle types are included for consideration for an exemption. The updated policy now clarifies this. The vehicle types included in the exemptions contains a small category of historic buses, driver training buses and some specialist HGV vehicles which are particularly costly to upgrade/cannot be retrofitted.

8.39.6 **Outcome:** Change in GM Clean Air Plan Policy, for:

[71] https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/863730/clean-air-zone-framework-feb2020.pdf

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- Heritage buses, which are over 20 years old, in private ownership and which are not used for hire or reward can apply for a permanent exemption.
- Training buses, adapted for use for, and dedicated to, driver training purposes and owned by the Applicant prior to 3rd December 2020 can apply for a permanent exemption.
- Vehicles considered heavily specialised HGVs, such as certain vehicles used in construction or vehicle recovery and defined by the vehicle's DVLA Tax Class. The following DVLA Tax Classes are eligible to apply for permanent exemption:
    - Special Types Tax Class
    - Special Vehicles Tax Class
    - Recovery Vehicle Tax Class
    - Special Concessionary Tax Class

8.40 **Disabled passenger vehicles should not be permanently exempt**

8.40.1 **Issue:** Some respondents felt that disabled passenger vehicles should not be given a permanent exemption as all non-compliant vehicles contribute to poor air quality.

8.40.2 **Response:** There is an existing Permanent National Exemption set out within the Government's Clean Air Framework, which relates to disabled passenger vehicles but this is limited to vehicles used by organisations that provide transport for the disabled. The permanent local exemptions relating to vehicles used by disabled people is a reasonable adjustment to ensure that disabled people are not adversely disadvantaged by a GM CAZ. The effect of exempting these vehicles upon meeting compliance in the shortest possible time has also been considered and concluded that there would be no significant impact. The Equality Impact Assessment has also considered this exemption and concluded its importance in recognising protected characteristics and minimising any disproportionate negative impacts from a GM CAZ that may be incurred on account of a disability.

8.40.3 **Outcome:** No change in GM Clean Air Plan Policy, disabled passenger vehicles will remain permanently exempt from the CAZ.

8.41 **Other specific suggestions on vehicles that should not be permanently exempt**

8.41.1 **Issue**: Some respondents disagrees with the proposed permanent exemption of driving through the zone due to diversions and felt these drivers should still be subject to the charge. Respondents also commented on how all vehicles contribute to air pollution and should not be exempt, including emergency service and disabled vehicles.

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8.41.2 **Response:** Discounts and exemptions as part of the GM CAP have been carefully considered to address discrete and specific issues, for example where it may generally not be practical to upgrade to a vehicle compliant with the emission standards of the GM CAZ or to provide protection to particularly vulnerable groups based upon protected characteristics. The current proposals are considered a proportionate proposal in light of considerations for vulnerable groups and critical services such as emergency services and services provided to vulnerable or disabled people, whilst still meeting compliance with air quality requirements in the shortest possible time.

8.41.3 The temporary exemption for diversion recognises instances where vehicles will enter the zone involuntarily whilst a designated diversion route is in place, which is outside of the control of the driver. A similar approach is also taken for other charging schemes.

8.41.4 **Outcome:** No change in GM Clean Air Plan Policy.

8.42 Clean Air Zone – Changes to the temporary exemptions to the daily charge

8.42.1 **Issue:** Some respondents disagreed with the temporary exemptions as they felt that vehicles should have already upgraded or that greater air quality benefits could be secured without them. Some comments suggested temporary exemptions should be for a shorter period of time (including those for hackney carriages, private hire vehicles and LGVs), that some vehicles should be out of scope for exemptions. In some cases this was due to the vehicles' contribution to air pollution.

8.42.2 **Response:** As set out in Technical Note 12[72], evidence collected by GM in 2019 suggested that introducing a CAZ C across the region before 2023 without a temporary exemption for LGVs would not be effective, as there would not be a sufficient fleet of affordable second-hand LGVs available to enable GM's van owners to upgrade in response to the scheme. The evidence suggested that small and medium sized businesses, particularly in the Construction sector, tend to be second or third life vehicles and would therefore be reliant on the availability of affordable second-hand Euro 6 vehicles in order to be able to comply.

8.42.3 The impact of the pandemic has meant that there was a significant fall in new LGV registrations from March to June 2020. Registrations subsequently rebounded into 2021 with new registration levels now broadly following pre-pandemic trends. It is anticipated that over the duration of the GM CAP[73], the age of the LGV fleet is expected to get closer to the age of the fleet as forecast pre-pandemic, so the impact of the pandemic on the LGV fleet will decline over time. The pandemic has therefore exacerbated concerns about the availability of compliant LGVs in the early years of the GM CAP.

[72] Available at Technical Documents | Clean Air Greater Manchester (cleanairgm.com)
[73] It is anticipated that, once implemented, the Clean Air Zone will remain in full operation until at least the second half of 2026.

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8.42.4 The demand for zero-emission vans is increasing. GM has applied Government assumptions about the uptake of zero-emission vans within its modelling. There is not, however, evidence that GM is aware of that the uptake of zero-emission vans is taking place outside of normal fleet renewal cycles. New vans are typically purchased by larger businesses and fleets, who then typically operate their vehicles for 3-5 years before replacement.

8.42.5 The evidence suggests that many LGV owners have experienced reduced turnover and profits, have used up savings/reserves, are more indebted, and have delayed or are planning to delay capital investment (including in replacement vehicles) as a result of the pandemic. Analysis of the five largest van-owning sectors identified particular impacts on the construction sector, where more than half of vans are non-compliant and there is a high proportion of sole traders, and the hospitality sector, which has a more compliant fleet but has been very heavily impacted by the pandemic. This means that owners of non-compliant LGVs are less well placed to upgrade their vehicles than prior to the pandemic.

8.42.6 The temporary exemption for GM hackneys and private hire vehicles recognises the need to allow more time for these vehicles to be upgraded to compliant alternatives and the need to protect the service they provide to vulnerable users across Greater Manchester. The temporary exemption is supported by evidence from Technical Notes 19 and 37[74], alongside deliberative research and engagement with the taxi trade and the Equalities Impact Assessment (EqIA). The taxi trade – Hackney Carriages and PHVs – has been heavily impacted by the pandemic. There has been a very substantial reduction in demand for taxi services, with long periods of closure or low operations and consequent revenue losses. Many vehicles in this sector are privately owned and a relatively high proportion of the fleet is non-compliant.

8.42.7 If charging were to be introduced earlier for those groups where upgrade is limited by the availability, cost and affordability of compliant vehicles, vehicle owners may respond by choosing to stay and pay – potentially passing on the costs to customers/passengers without benefiting air quality– or they may leave the industry. This could lead to increased costs for consumers, if it led to a shortage of tradespeople for example, or to a loss of services in GM, including accessible taxi services for vulnerable and disabled people. There is also a risk that owners of smaller vans switch to a car to avoid the charge which may again not benefit air quality.

8.42.8 The nature of any behavioural response is uncertain, and made more so by the pandemic which may still be affecting the operations of some businesses in 2022[75].

[74] All technical reports are available here: https://cleanairgm.com/technical-documents
[75] For further discussion and evidence on the impacts of Covid-19, see the 'Impacts of Covid-19 on the GM CAP Report'.

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8.42.9 In practice, many vehicle owners will use the period of the temporary exemption to upgrade their fleets in advance of charging starting to apply. Therefore, we would expect to see a gradual acceleration of upgrade above and beyond the 'Do Minimum' scenario amongst those groups in scope for the temporary exemption during 2022 and early 2023. The funding offer will further encourage this, particularly for those groups in scope for the first phases of the funds, which are typically the smallest businesses and who own the oldest vehicles. Thus the impact of the temporary exemptions on emissions is arguably overstated in the modelling, which does not take into account the possibility of upgrade prior to scheme going-live.

8.42.10 As set out in Technical Note 38, modelling demonstrates that as long as the temporary exemptions have been removed early enough that drivers will have had time to be influenced by the forthcoming CAZ charge, make their choices and obtain a new vehicle before 1st January 2024 (the year of compliance), then the temporary exemptions would not affect the predicted legal compliance date. With the proposed extension to the temporary exemption to 31st May 2023, sufficient time is available in advance of 1st January 2024 for affected vehicles owners/registered keepers of these vehicles to upgrade to a compliant vehicle.

8.42.11 In summary, the ten GM local authorities considers that there remains a good case for offering a temporary exemption to LGVs, GM-licensed hackney carriages and PHVs. It is intended that Funds will be open from autumn 2021, encouraging non-compliant vehicle owners to upgrade their vehicles in advance of the date on which charges will become payable. The Funds will open to the smallest businesses operating the oldest LGVs first.

8.42.12 The temporary exemptions offered by the GM CAP have been designed to provide an amount of additional time to upgrade, whilst still ensuring that compliance with the legal limits for nitrogen dioxide is delivered by 2024 at the latest.

8.42.13 The GM CAP will also be implemented so that exposure to levels above the legal limit for nitrogen dioxide are reduced as quickly as possible. For example, the policy proposes that the oldest vans are targeted first with funds, with other funds targeting the smallest commercial-vehicle owning businesses first, which are the least likely to be able to upgrade and typically operate the oldest vehicles. Bus Retrofit has already commenced to ensure the most polluting vehicles are being retrofitted first.

8.42.14 **Outcome:** No change in GM Clean Air Plan Policy.

8.43 **Changes to temporary exemptions**

8.43.1 **Issue:** Some respondents asked for extensions to the temporary exemptions. Overall, there was an almost even split in the number of comments between those who owned an impacted vehicle and those who do not.

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8.43.2 Some feedback states that, instead of discounts and exemptions, the focus should be on providing direct support to people and businesses to switch to alternative cleaner forms. This feedback suggests an increase in the provision of funding for upgrade may be a more appropriate response. Feedback also highlights consideration that encouraging compliance through funding compliant vehicles rather than giving more time, could also mitigate some potential equality risk.

8.43.3 **Response:** Temporary exemptions have been adopted to address impacts identified in the Distributional Impacts Assessment for vehicle groups and where the temporary exemption could be provided without a risk to meeting compliance with the legal limits for nitrogen dioxide by 2024 at the latest.

8.43.4 The COVID-19 impacts research, prepared following consultation, highlights that COVID-19 is likely to have had a negative socio-economic impact on impacted vehicle users across GM. It may affect the length of time needed for some non-compliant vehicle owners to upgrade. Consultation feedback also reflects a need for more time to upgrade, with representations from impacted vehicle users highlighting the economic impact of COVID-19 affecting their ability to afford an upgrade to compliant vehicles.

8.43.5 Alongside the temporary local exemptions in place, changes have been made to the support measures to encourage owners of non-compliant vehicles to upgrade.

8.43.6 The end date for all temporary exemptions will be set at 31 May 2023 to provide further time to those groups to upgrade before charges are introduced. Within this time, the Clean Vehicle Funds will open including the use of rounds of funding during the period of the temporary exemptions, which will encourage eligible owners of vehicles in these groups to upgrade before the end of the temporary exemption.

8.43.7 **Outcome:** Change in GM Clean Air Plan Policy, temporary exemptions will remain in policy and be extended to include all PHVs and Hackney Carriages licensed in GM, all coaches and LGVs and minibuses. It will be in place until 31 May 2023.

8.44 **Lead in time/availability/retrofit capacity resulting in delays of upgrades to compliant alternatives of over 12 weeks.**

8.44.1 **Issue:** Consultation feedback, feedback through deliberative research and information gained from engagement with the supply chain has highlighted that for some vehicle types (e.g. HGVs, buses, some retrofit solutions), there may be a long delay between ordering the replacement vehicle or retrofit solution and receipt of the replacement vehicle or the retrofit solution being fitted.

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8.44.2 **Response:** Market engagement has highlighted there are three main suppliers for CVRAS accredited retrofit solutions for bus, coach, HGV, LGV nationwide and one supplier of LPG conversion of Hackney Carriages, which may constrain the availability to retrofit solutions and resulting in delay in an owner/registered keeper upgrading to a compliant vehicle. In some exceptional cases, this delay will exceed the temporary exemption for a maximum of 12 weeks currently offered in the Policy for Consultation.

8.44.3 **Outcome:** Change in GM Clean Air Plan Policy, in exceptional circumstances where delays exceed the maximum 12 weeks length of the temporary exemption, the proposed policy now allows a vehicle owner to present further evidence of the delay in upgrade to a compliant alternative, which could be considered a further 'limited supply' temporary exemption. The temporary exemption will be available until 31st May 2023 and after 31st May 2023 non-compliant vehicles will be charged.

8.45 Temporary exemptions should be offered to those coach operators based outside GM but operating within it.

8.45.1 **Issue:** The temporary exemption for 'Coaches and buses registered to a business address within GM and not used on a registered bus service within GM', requires the vehicle to be registered to an address within GM. Consultation feedback and further research into the impacts of COVID-19 on the coach sector suggest that consideration should be made of removing the requirement for vehicles to be GM registered.

8.45.2 **Response:** Stakeholder feedback and research carried out into the coach sector suggests that extending the temporary exemption for coaches registered in GM to all coaches would provide an important mitigation to the coach sector, giving them further time to upgrade.

8.45.3 Most other discounts and exemptions proposed for the GM CAZ scheme do not require the vehicle to be registered within GM. This change would reflect the longer distance nature of the coach market. These services are often providing a service to benefit local people and often from those with protected characteristics or from lower socio-economic groups who rely more on coach travel.

8.45.4 **Outcome:** Change in GM Clean Air Plan Policy, the temporary exemption for coaches registered within GM removes the requirement for the vehicle to be registered within GM. The condition that the vehicle must not be in use on a GM registered bus service will be retained.

8.46 **Temporary exemptions should be offered to all GM licensed hackneys and private hire vehicles**

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8.46.1 **Issue:** Consultation feedback and the research into the impacts of COVID-19 have highlighted a disproportionately high and severe impact on the GM Hackney and private hire vehicle (PHV) trade, including when compared to other vehicles subject to a GM CAZ charge. A temporary exemption which covered all GM licensed taxis (hackney and PHV) could provide this group with further time to upgrade to a compliant vehicle to recognise the impacts of COVID-19 on their ability to afford to upgrade and timescales within which they are able to upgrade.

8.46.2 **Response:** A temporary exemption was proposed for GM-licensed wheelchair accessible vehicle (WAV) hackneys and WAV PHVs. It is considered that this temporary exemption could be extended to all GM-licensed hackneys and PHVs. This would provide the GM taxi trade with more time to recover from the effects of COVID-19 and support their ability to invest in upgrades to compliant alternatives before a charge is applied. Including the temporary exemption in the GM Clean Air Plan will still deliver compliance in the shortest possible time and by 2024 at the latest and will not materially affect the reduction in exposure to levels of nitrogen dioxide above legal limits.

8.46.3 Support measures will be available during the period of temporary exemption to allow Hackney and PHV owners to upgrade before the end of the temporary exemption. This intends to encourage early upgrade.

8.46.4 **Outcome:** Change in GM Clean Air Plan Policy, a temporary exemption is offered to all GM licensed hackneys and PHVs, until 31 May 2023.

8.47 **Temporary exemptions should be extended to other vehicles**

8.47.1 **Issue:** Many respondents provided a comment on the temporary local exemptions, of which over half gave a generally supportive comment. Reasons given for supporting temporary exemptions were that it was fair to give this time so vehicle owners can find the money to upgrade or buy a new vehicle that meets the GM CAZ standards. There were minimal comments that the temporary exemption should be extended to other vehicles. Some respondents had commented on private leisure vehicles being made permanently exempt, which has been considered earlier in this section.

8.47.2 **Response:** All temporary exemptions in place at consultation remain or have been enhanced to include more impacted vehicle owners. The previous discount for leisure vehicles in private ownership that are over 3.5t has been amended to all vehicles classified under the Private HGV tax class to be eligible for a discounted charge of £10 per day, rather than £60, or a temporary exemption.

8.47.3 **Outcome:** No change in GM Clean Air Plan Policy, no further temporary exemptions will be included in the plan, other than those already described, following this feedback.

8.48 **Opposition to the permanent discounts**

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8.48.1 **Issue:** Some comments provided on discounts mentioned that they felt that discounts weren't needed as they felt every vehicle going through the Clean Air Zone should be charged. Others felt that vehicles should have been upgraded already and therefore discounts were redundant.

8.48.2 Respondents also felt it is not fair or equitable to discount charges and that it reduces the chance of upgrade. The use of discounts was seen to undermine the purpose of the CM CAP to improve air quality. Some respondents suggested the discounts should be time limited or that discounts are not needed. Concerns were raised that the discounts could undermine the effectiveness of the scheme, by reducing the incentive to upgrade, particularly for PHVs.

8.48.3 **Response:** Discounts proposed as part of the GM CAP have been carefully considered to address discrete and specific issues, following feedback gathered through the Conversation in 2019. As guided by the Government's Clean Air Framework, Greater Manchester has constrained the discounts offered to ensure compliance is met in the shortest possible time.

8.48.4 It has been concluded that offering a discount to PHV drivers is not the best way to mitigate the negative impacts of the CAZ on that group.

8.48.5 Licensed PHVs can only be driven by a licensed driver – a vehicle used for taxi services is always a licensed taxi. Therefore, at all times it is a licensed vehicle, rather than a private car. After consideration of the feedback from consultation, GM considered that offering PHVs a discount did not provide parity with other commercial vehicles which are sometimes also used for private travel.

8.48.6 Rather than offering a discount, a temporary exemption to 31 May 2023 for all GM-licensed Private Hire Vehicles and Hackney Carriages and further options for replacement and retrofit are more suitable revisions to the scheme to meet the air quality objectives.

8.48.7 Although previous analysis had suggested that offering a PHV discount was not forecast to affect the achievement of compliance in the shortest possible time[76], removing the discount does remove any such risk and means that very frequent users are most incentivized to upgrade.

8.48.8 The GM CAP recognises the need for parity of treatment of vehicles used for leisure purposes such as motorhomes and horseboxes, such that vehicles should be charged at the same rate regardless of size. The proposed discount has been revised to a Private HGV Tax Class vehicle discount, which offers a discounted charge to £10 (from £60) for vehicles in the DVLA Private HGV Tax Class to provide parity of treatment of these vehicles.

[76] See Technical Note 38 Discounts and Exemptions at Vehicle Population Estimates Note (37) (ctfassets.net)

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8.48.9 The current proposals are considered a proportionate proposal in light of considerations of discrete vehicle types. Those eligible for a discount will still have access to supporting funds, where eligible, which will provide encouragement to upgrade non-compliant vehicles even where a discount has been offered. A discount was considered a more proportionate response than an exemption, as it retained an incentive to upgrade to avoid the charge.

8.48.10 **Outcome:** Change in GM Clean Air Plan Policy, the revised temporary exemption (extended to all GM licensed hackneys and PHVs), will replace the PHV discount.

8.49 **Concerns about enforcement and abuse of exemptions and discounts**

8.49.1 **Issue:** Consultation feedback related to concerns about enforcement and potential abuse of discounts. Respondents highlighted the potential abuse of the discounts (particularly the PHV discount), using it as a loophole to avoid paying a full charge.

8.49.2 **Response:** The administrative procedures associated with discounts will be designed to minimise 'loopholes' and/or the ability to gain access to the discounts inappropriately. The administration of discounts and exemptions will have robust monitoring and enforcement processes, ensuring regular checks are made on the administration of discounts and exemptions in order to reduce the risk of abuse and to address abuse where it is identified. Changes made to the discounts, as set out elsewhere, reduce the risk of abuse, as eligibility for the remaining discount will be based on Tax Class not on evidence supplied by the applicant about their use of the vehicle.

8.49.3 **Outcome:** No change in GM Clean Air Plan Policy, however, the consultation feedback highlighting potential areas for abuse will inform the development of procedures to seek to avoid abuse of discounts and exemptions. No change to the policy for enforcement/abuse.

8.50 **Discounts should be offered to: Leisure vehicles under 3.5t**

8.50.1 **Issue:** Consultation responses sought parity of treatment for leisure vehicles. Some respondents called for a discount for leisure vehicles of up to 3.5t as discounts are offered to leisure vehicles over 3.5t.

8.50.2 **Response:** The GM CAP recognises the need for parity of treatment of vehicles used for leisure purposes such as motorhomes and horseboxes, such that vehicles should be charged at the same rate regardless of size. The proposed discount has been revised to a Private HGV Tax Class vehicle discount, which offers a discounted charge to £10 (from £60) for vehicles in the DVLA Private HGV Tax Class to provide parity of treatment of these vehicles.

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8.50.3 The DVLA Private HGV Tax Class also includes vehicles used for HGV driver training. Offering this group a discount recognizes that driver training vehicles provide an essential service and as specially adapted vehicles are difficult to upgrade, and responds to representations received from driver training providers that it was not economical or viable for them to upgrade.

8.50.4 Defining the discount using the DVLA Private Tax Class removes the need for applicants to provide complex evidence of use, reducing the risk of abuse, and limits the exemption to those operating unladen, which includes driver training vehicles, large motorhomes and some large horseboxes.

8.50.5 **Outcome:** Change in GM Clean Air Policy, discount will be re-defined as applying to vehicles registered under the DVLA Private HGV Tax Class. Discounts will not be offered to leisure vehicles up to 3.5t.

8.51 **Discounts should be offered to: Hackney Carriages**

8.51.1 **Issue:** Some respondents felt that hackney carriages also had the potential to be used privately and so should be treated the same as a private hire vehicle and should also receive a discounted charge of 5/7 of the weekly total.

8.51.2 **Response:** Licensing conditions for hackney carriages and PHVs mean that the vehicle is always considered a licensed hackney carriages or PHV. The discounted charge of 5/7 for PHV is being withdrawn in light of this.

8.51.3 **Outcome:** No change in GM Clean Air Plan Policy, a 5/7 discount will not be offered to Hackney Carriages.

8.52 **Discounts should be offered to: those based outside GM but operating within it.**

8.52.1 **Issue:** Consultation feedback by those who live just outside of the Greater Manchester boundary suggested that they should be provided with a discount if they are not going to be eligible for funding to support to upgrade. It was largely raised by owners of private HGVs >3.5t.

8.52.2 Feedback highlighted that this would damage the GM leisure industry, e.g. events, equine and caravan park businesses, by potentially excluding non-GM vehicles from attending due to the high cost of entering the zone (£60 per charging day) in the absence of a discount. It was considered that this impact would be especially felt by those on the edge of GM that rely on business from outside of GM, suggesting it will deter use of GM businesses in favour of facilities in neighbouring areas.

8.52.3 Stakeholder feedback suggests impacts mainly fall on older age groups and stakeholders also stated their exercise would be limited, affordability of their hobby would be impacted, suggesting potential health and wellbeing impacts, and the potential for implications on animal welfare if the proposal was not changed.

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8.52.4 **Response:** GM agrees that restricting the proposed discount to those vehicles which are registered within GM has the potential to create a disproportionate impact to GM businesses reliant on trade associated with these vehicles and could have a disproportionate impact on businesses located on the outskirts (but still within) the GM CAZ area. The requirement to have owned the vehicle for 12 months may also have a disproportionate impact and is not a requirement on other vehicle types considered for discount or exemption under the proposals.

8.52.5 Therefore, GM is proposing to change the discount such that it is offered to all vehicles of the same type, regardless of place of registration and period of ownership. It is proposed that the discount will be available to all vehicles within the DVLA Private HGV Tax Class, which includes large motorhomes, some large horseboxes and HGVs adapted as driver training vehicles.

8.52.6 This is considered to be a clearer and fairer way to identify vehicles within scope than the term 'leisure vehicles'. Changing the requirements of the discount to apply to all vehicles classified under the DVLA 'Private HGV Tax Class' would provide mitigation to the potential equity issues raised through consultation and clarify to the public the vehicles in scope for the discount.

8.52.7 **Outcome:** Change in GM Clean Air Plan Policy, there will be a discount available to all vehicles within the DVLA Private HGV Tax Class, regardless of place of registration.

8.53 **Discounts should be higher/offered more widely: other comments**

8.53.1 **Issue:** Small amount of feedback around providing discounts to other vehicle types and higher rates of discount.

8.53.2 **Response:** Discounts used more widely on vehicles liable to pay a charge under a GM CAZ would undermine the CAZ charges. CAZ charges have been set at a level to promote upgrade to a compliant vehicle. The Government's Clean Air Zone Framework states that discounts should be kept to the minimum necessary to maximise the benefits of the CAZ and any change made should not risk compliance.

8.53.3 Clean Vehicle Funds have been designed to support those vulnerable to a CAZ charge to upgrade and this funding is targeted towards GM's smallest businesses.

8.53.4 Further (higher) discounting of the charge for existing discounts would further reduce the incentive to upgrade, which is the purpose of a charge.

8.53.5 **Outcome:** No Change in GM Clean Air Plan Policy.

8.54 **Oppose 5/7 discount offered to Private Hire Vehicles (PHVs)**

8.54.1 **Issue:** Some feedback was not supportive of a discount for PHVs due to concerns that the vehicles are heavy polluters, that the discounts are not needed, that the discount will be abused and, that the discount will result in upgrades of vehicles to compliant alternatives.

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8.54.2 **Response:** Both licensed PHVs (and Hackney Carriages) can only be driven by a licensed driver – a vehicle used for taxi services is always a licensed taxi. Therefore, at all times it is a licensed vehicle, rather than a private car. After consideration of the feedback from consultation, GM considered that offering PHVs a discount did not provide parity with other commercial vehicles which are sometimes also used for private travel.

8.54.3 Rather than offering a discount, a temporary exemption to 31 May 2023 for all GM-licensed Private Hire Vehicles and Hackney Carriages and further options for replacement and retrofit are more suitable revisions to the scheme to meet the air quality objectives.

8.54.4 **Outcome:** Change in GM Clean Air Plan Policy, the revised temporary exemption (extended to all GM licensed hackneys and PHVs), will replace the PHV discount.

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9 GM Authorities' Response to Clean Air Plan Consultation: Funding and other measures

9.1 Introduction

9.1.1 This section looks at the responses to the funding and other support measures with the GM Clean Air Plan policy at consultation and the response and outcome for the final GM Clean Air Plan.

9.1.2 Many of the consultation responses supported the funding and other support measures and the proposed grants to those in GM who have non-compliant vehicles.

9.1.3 In the consultation, deliberative research and the COVID-19 impacts research, there were many cases of non-compliant vehicle owners explaining the barriers to upgrade and the challenges they are facing in light of the pandemic.

9.1.4 To respond to that feedback and support owners of non-compliant vehicles based in Greater Manchester there are a number of new funding offers for both replacing vehicles and retrofitting them.

9.2 Should only offer grants and not vehicle finance / should only offer vehicle finance and not grants

9.2.1 **Issue:** There was significant support for funding support in principle. A small number of respondents felt that funding should not come in the form of a repayable loan and should be given as a lump sum grant. Conversely, a greater number of respondents (yet still a relatively small proportion overall) suggested that funding should only come in the form of a repayable loan rather than a lump sum grant also being available.

9.2.2 **Response:** The decision to provide either a lump sum non-repayable grant or access to vehicle finance through the Clean Taxi Fund (CTF) and Clean Commercial Vehicle Fund (CCVF) is based upon providing choice and flexibility to those affected by the GM CAP proposals. Feedback received as part of the Clean Air Conversation in 2019 indicated that vehicle finance is essential to help some owners upgrade their vehicle. Eligible applicants will be able to choose the option which best suits their circumstances.

9.2.3 The availability of either a lump sum non-repayable grant or access to vehicle finance through the CTF and CCVF is also a key measure to reduce the potential negative equality impacts of the GM CAZ. Specifically the accessibility of the grants or finance seeks to minimise potential barriers to applications to the GM CAP schemes, including those which might be experienced by affected parties with protected characteristics. By offering a choice GM seeks to support more non-compliant vehicle owners to upgrade. Providing a number of choices, which may be suitable to different people depending on their own financial situations.

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9.2.4 **Outcome:** No change in GM Clean Air Plan Policy, GM will continue to include funding support for eligible applicants by providing either a lump sum non-repayable grant or access to vehicle finance.

9.3 '**Fair' access to funding**

9.3.1 **Issue:** A number of consultation responses raised general points in relation to the need for 'fair' access to funding support. This included specific suggestions that funding should be available for all owners or registered keepers of affected vehicle types. There was polarised feedback, with a number of respondents suggesting that the scheme should provide funding for all those affected, whilst others feel that public funding support should not be provided to private businesses and commercial entities to upgrade their vehicles.

9.3.2 **Response:** Whilst a GM CAZ C has been shown to be the fastest way to ensure compliance, there is evidence (GM CAP Analysis of Distributional Impacts) that the plans could particularly impact low-income families, small businesses and people living and working in GM who will struggle to manage the additional cost burden. The CCVF and CTF aim to mitigate these socio-economic impacts as much as possible.

9.3.3 Financial support through the CCVF and CTF is being targeted towards those who are most vulnerable to the GM CAZ charge and costs of upgrade. Whilst some consultation feedback calls for funding for all applicants, there is also feedback which highlights that larger businesses should be able to respond to the proposals without receiving public funds to support upgrade. Based upon supporting analysis[77], the proposals and funding available are considered a proportionate response to drive upgrade to compliant vehicles whilst minimising significant socio-economic impacts.

9.3.4 The proposals have been assessed throughout their development, including with respect to equalities impacts, and provide access to the funding support for those likely to be most vulnerable to the GM CAZ charge and costs of upgrade. Feedback from the consultation supported the conclusion that the smallest businesses, sole traders and individual vehicle owners, charities and the voluntary sector were the most vulnerable to the impacts of the CAZ and should be prioritised for funding support.

9.3.5 **Outcome:** No change in GM Clean Air Plan Policy.

9.4 **Oppose funding for the upgrade of non-compliant vehicles**

[77] See Technical Notes considering each vehicle type, available at Technical Documents | Clean Air Greater Manchester (cleanairgm.com)

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9.4.1 **Issue:** Some respondents indicated a general opposition to the provision of GM funding support to those that will be affected by the proposed GM CAZ, through either grants or a contribution to vehicle finance. This view often correlates with general opposition to the GM CAZ (e.g. charges, boundary etc.). There were also specific points made around the Clean Bus Fund (CBF), Clean Taxi Fund (CTF) and Clean Commercial Vehicle Fund (CCVF)

9.4.2 **Response:** Whilst a number of respondents opposed the provision of funding support or suggested it was not necessary, overall there was high level of support for the funds and many respondents felt they were needed in order to help affected parties upgrade to compliant vehicles.

9.4.3 As set out previously within this Response to Consultation, the ten GM Local Authorities are required to implement measures to achieve compliance with the Limit Value for NO_2 concentrations in the shortest possible time. The analysis supporting the GM CAP Outline Business Case submitted to the Government at the end of March 2019 demonstrates that a Charging CAZ C, with supporting measures, is necessary to achieve this requirement. Those supporting measures include funding to support non-compliant vehicle owners to upgrade. For some vehicle types, the provision of funding has been suggested within the modelling process to be essential to achieving the necessary upgrade; for other vehicle types, the provision of funding helps encourage vehicle owners to upgrade rather than stay and pay, and helps make achieving the behavioural responses forecast more certain.

9.4.4 Vehicle owners responding to the consultation say that they need help to upgrade as they cannot afford it and that for most sectors, including the taxi and coach sectors, COVID-19 has had a negative economic impact on their businesses.

9.4.5 Analysis of the impact of introducing a Charging CAZ C in isolation has demonstrated that there would be compliance issues if it were introduced on its own, as many would be unable to afford the upgrade cost without financial support, especially smaller business, social enterprises and charities. This group would be forced to pay the charge. Further detail can be found in the Analysis of Distributional Impacts which was published as part of the Consultation.[78]

9.4.6 It is proposed that groups identified as more vulnerable to affordability impacts, such as individuals, micro businesses and small businesses should be supported to upgrade, to ensure reduced levels of negative socio-economic impact. Businesses have seen their savings reduced, lower turnover and lower profits as a result of the COVID-19 pandemic. Therefore, there is likely to be a greater need for funding support for individuals and businesses to upgrade their non-compliant vehicles as a result of the Greater Manchester Clean Air Zone.

[78] TfGM, 2019. Greater Manchester's Outline Business Case to tackle Nitrogen Dioxide Exceedances at the Roadside. Analysis of Distributional Impacts

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9.4.7 **Outcome:** No change in GM Clean Air Plan Policy, the GM CAP proposes a package of funding support to help owners or registered keepers of non-compliant vehicles with the cost of upgrading their vehicles. This will specifically include the Clean Bus Fund, Clean Commercial Vehicle Fund and Clean Taxi Fund.

9.5 **Concerns about affordability of upgrades and indebtedness and view that vehicle finance would need to be at or close to 0% interest rate to be affordable**

9.5.1 **Issue:** Respondents raised general concerns regarding the risk that those affected by the GM CAZ charges could subsequently be placed into debt as a result.

9.5.2 **Response:** Measures have been embedded within the GM CAP proposals to reduce the risk that owners or registered keepers of non-compliant vehicles would be placed into unsustainable finance arrangements.

9.5.3 It is recognised that not all owners have investment plans and the cost of upgrading vehicles varies depending on the type and age of the existing vehicle and vehicle required. Extensive research has been conducted to determine an appropriate level of funding support for different vehicle types and the mechanisms through which this should be provided[79].

9.5.4 The availability of Clean Vehicle funding support through either a non-repayable grant or access to vehicle finance is based upon providing choice and flexibility to those affected by the GM CAP proposals. Eligible applicants will be able to choose the option which best suits their circumstances. Feedback received as part of the Clean Air Conversation in 2019 indicated that vehicle finance is needed to help owners upgrade their vehicle(s), as introduction of the GM Clean Air Zone is disrupting vehicle renewal cycles and some affected parties will need help in getting access to finance. Where possible, and dependent on the circumstances of the applicant and at the discretion of the finance providers, finance would be offered at or close to 0% interest rates.

9.5.5 The grants available to upgrade non-compliant vehicles are not intended to fully subsidise the cost of a compliant vehicle. This can be used, for example, alongside capital generated through the residual value of their existing vehicle and/or savings earmarked for their next vehicle upgrade, to purchase a compliant replacement vehicle. Alternatively, it may also be used to secure vehicle finance arrangements outside of the GM CAP Vehicle Finance scheme (with the exception of the Clean Bus Fund). The grant option therefore seeks to mitigate the potential additional costs that applicants face by the costs of their next vehicle upgrade being brought forward as a result of the GM CAP. The final plan includes increased grant amounts for a number of vehicle types as a result of consultation feedback.

[79] For example, this includes the GM CAP LGV and HGV Operational Cost Models (Technical Note 7) and the GM CAP Analysis of Funds (Technical Note 26) that can be found at https://cleanairgm.com/technical-documents/

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9.5.6 Alternatively, if applicants wish to spread the cost of upgrade then funding support is available through the GM CAP Vehicle Finance scheme. As with the grant option, the GM CAP Vehicle Finance measure is not intended to fully subsidise the cost of a compliant vehicle. It seeks to mitigate the additional costs that applicants face by their next vehicle upgrade being brought forward as a result of the GM CAP. The Vehicle Finance option includes a funding contribution which seeks to ensure that applicants are able to access affordable finance, through for example reducing associated interest rates. As with the grant amount available, the final GM CAP proposals include an increased contribution for a number of vehicle types as a result of consultation feedback.

9.5.7 For many vehicle types, the funding support available has been increased, made available for more upgrade and retrofit options and in some cases non-compliant vehicle owners have more time to upgrade. Though the GM CAP will not entirely subsidise the costs of upgrade to a compliant vehicle. It is intended to mitigate the additional costs of upgrade by vehicle renewals being brought forward as a result of the GM CAZ. The plan includes measures which seek to make vehicle upgrade affordable.

9.5.8 **Outcome:** Change in GM Clean Air Plan Policy, based upon consultation feedback, adjustments have been made to the grant amounts and vehicle finance contributions available to owners or registered keepers of a number of vehicle types, to increase the amount of financial support available to applicants. The specific changes proposed are set out in the following sections below: sections 9.18 to 9.23 and section 9.27.

9.6 **Concerns about the management of vehicle funding**

9.6.1 **Issue:** A number of responses either alluded to or directly noted concerns that the funding support provided through the GM CAP could be mismanaged or that there would be a lack of transparency during administration, suggesting suitable measures should be in place to reduce the risk of mismanagement.

9.6.2 **Response:** The administration of the GM CAP must be transparent and robust procedures must be in place to avoid mismanagement or misappropriation of funding.

9.6.3 Financial support will be managed and administered centrally on behalf of the 10 GM authorities. The appointment of suppliers supporting the implementation and operation of the GM CAP, including the appointment of finance providers, will be subject to appropriate procurement processes and contractual arrangements which reflect the need for the stringent management of funding. Finance provides will be regulated by the Financial Conduct Authority (FCA). Suppliers will also be required to monitor and report on the administration of funds, including investigation of misappropriation or fraud as appropriate.

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9.6.4 Applications will be facilitated by the GM Clean Vehicle Funds Scheme (CVFS) which has been procured through appropriate processes and is FCA regulated. The application process will be traceable and auditable to ensure the funding is allocated correctly.

9.6.5 The release of funding support to successful applicants will be facilitated directly with accredited suppliers of retrofit and replacement upgrade options, to ensure maintenance of a comprehensive audit trail, accountability for the use of public funding and to reduce the risk of fraudulent activity and misappropriation of funds. The exceptions to this are the Clean Bus Fund and running cost grants under the Clean Taxi Fund which are to be managed by TfGM with appropriate controls in place.

9.6.6 Processes will be in place to check the management of funds to check whether an applicant has abused the application process for the funds, vehicle finance, discounts or exemptions. This may lead to the termination of applications for funding or the taking of enforcement action to recover awarded grants where information provided is not truthful or accurate and possible further legal action.

9.6.7 **Outcome:** No change in GM Clean Air Plan Policy, a range of appropriate measures will be embedded within the GM CAP to ensure transparency, traceability and robust management and administration of funding.

9.7 **Risk of fraudulent applications for funds**

9.7.1 **Issue:** A number of respondents raised concerns regarding the risk of fraudulent applications to the Clean Vehicle Funds.

9.7.2 **Response:** It is acknowledged that opportunities for fraudulent applications should be minimised as far and practicable.

9.7.3 The GM CAP proposals include a wide range of measures to reduce the risk of fraudulent applications and identity such instances. This includes robust eligibility criteria which must be wholly satisfied prior to the release of funding support. For example, non-compliant vehicles which are to be upgraded via the Clean Vehicles Funds must be registered to applicants for a minimum period of time in advance of their application, to avoid the risk of vehicles being cycled through the funds in order to generate profits. Similarly, upgraded vehicles must continue to operate within GM for a minimum period of time following receipt by the applicant.

9.7.4 Compliance with eligibility criteria will be evidenced through a clearly stipulated suite of documentation, checks of which will be automated as far as practicable through use of nationally managed databases subject to existing anti-fraud measures.

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9.7.5 The release of funding support to successful applicants will be facilitated directly with accredited suppliers of retrofit and replacement upgrade options, to ensure maintenance of a comprehensive audit trail, accountability for public funding and to reduce the risk of fraudulent activity and misappropriation of funds. The exceptions to this are the Clean Bus Fund and running cost grants under the Clean Taxi Fund which are to be managed by TfGM with appropriate controls in place.

9.7.6 GM is proposing that if an applicant is found to have abused the application process for the funds, vehicle finance, discounts or exemptions (e.g. falsified information), such that there is a risk of misappropriation, the right is reserved to terminate applications for funding or take enforcement action to recover awarded grants where information provided is not truthful or accurate.

9.7.7 Furthermore, any applicants found to have abused the application process or made a fraudulent application will not be eligible for any existing GM CAZ exemptions, discounts or financial support and GM will refer the matter to the relevant authorities where applicable.

9.7.8 Suppliers will also be required to monitor and report on the administration of funds, including investigation of misappropriation or fraud as appropriate. Should this process identify that any further mitigation measures may be necessary to address the risk of fraudulent activity these will be considered by the operating body.

9.7.9 **Outcome:** No change in GM Clean Air Plan Policy, a range of appropriate measures are being embedded within the GM CAP to ensure transparency, traceability of funding and minimise opportunities for fraudulent applications should be minimised as far and practicable.

9.8 **Funding source for the financial support through GM CAP and the operating costs**

9.8.1 **Issue:** A number of respondents have queried the source(s) of funding for both the financial support to be provided through the GM CAP and the operating costs of the proposals.

9.8.2 **Response:** Following submission of the GM CAP Outline Business Case to the Government, the GM local authorities have secured a proportion of this national government funding allocation in order to facilitate delivery of the GM CAP proposals.

9.8.3 The costs of operating the GM CAP will be covered through the revenues generated via the GM CAZ charges. As set out within the Government's Clean Air Zone Framework, The Transport Act 2000 requires any excess revenue that may arise from charges above the costs of operation to be re-invested to facilitate the achievement of local transport policies. These should aim to improve air quality and support the delivery of the ambitions of the zone, while ensuring this does not displace existing funding.

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9.8.4 **Outcome:** No change in GM Clean Air Plan Policy .

9.9 **Funding should target the oldest and most polluting vehicles as a priority**

9.9.1 **Issue:** Respondents suggested that the GM CAP proposals should seek to target the oldest and most polluting vehicles as a priority on the basis that this would be likely to have the most material impact upon pollution concentrations.

9.9.2 **Response:** Measures to target the upgrade of the oldest and/or most polluting vehicles have been considered throughout development of the GM CAP and are embedded within the proposals.

9.9.3 The development of the GM CAP has been informed by the Government's Clean Air Zone Framework[80]. This document sets out minimum vehicle emissions standards for each vehicle type which provide the basis for setting CAZ compliance criteria and designed to target older/more-polluting vehicles. These vehicles are then subject to the CAZ charges designed to encourage upgrade to less polluting vehicles which are compliant with the CAZ emission standards.

9.9.4 Beyond the CAZ emission standards, the funding measures for LGV further target the oldest and/or most polluting vehicles within the GM fleet. Funding support provided for LGVs through the Clean Commercial Vehicle Fund will be released in sequential funding rounds. The first funding round for LGVs will be restricted to eligible owners of non-compliant vehicles of Euro Emission standard 4 (Euro 4) or older. This will target the initial release of funding support at owners of older, more polluting vehicles within the GM fleet. Latter funding rounds will subsequently be open to eligible owners of any non-compliant vehicle within the scope of the CCVF.

9.9.5 **Outcome:** No change in GM Clean Air Plan Policy.

9.10 **Funding should be means tested**

9.10.1 **Issue:** Respondents suggested that rather than basing eligibility criteria upon business size or releasing funding support on a first come first served basis, that eligibility should be based upon more nuanced characteristics of applicants, including the impact of the GM CAP on their ongoing operations and financial circumstances. This included suggestions that some form of means testing is required.

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[80] https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/863730/clean-air-zone-framework-feb2020.pdf

9.10.2 **Response:** In developing the GM CAP proposals, a key principle applied during the evaluation of potential options has been that the proposals must facilitate a clear, transparent and accessible application process which encourages uptake of funding support. Additionally, the application process and subsequent process for release of funding support must allow efficient, timely release of funds to facilitate upgrade of a large volume of non-compliant vehicles ahead of the launch of the GM CAZ.

9.10.3 The administrative process associated with distributing the funds has been designed to be robust, based upon information commonly available for applicants that can be easily checked but not overly complex, such that the maximum amount of funding can be used for vehicle upgrades, rather than funding the administrative process itself.

9.10.4 An application process which is reliant on undertaking means testing for all applicants would import additional complexity within the application process. Given the scale of the GM CAP, relying on such a measure to confirm eligibility for funding support is considered likely to significantly increase operational costs and delay the availability of financial support, given the impacts such a change would have on the plans for implementation of the GM CAP.

9.10.5 **Outcome:** No change in GM Clean Air Plan Policy.

9.11 **Funding should only be for voluntary sector and small businesses and funding should be prioritised for these groups**

9.11.1 **Issue:** Respondents felt that funding should either be prioritised for smaller businesses or be provided solely to smaller businesses. Voluntary, charity and community groups were also raised as groups which should be prioritised for funding.

9.11.2 **Response:** GM has secured a funding allocation from Government to support the upgrade of non-compliant vehicles. Consultation feedback supports the approach of targeting funding towards the smallest businesses, voluntary, charity and community groups and individuals in GM, as well as supporting controls that prevent larger businesses or businesses with large fleets dominating the use of funds.

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9.11.3 The vehicle caps set in the policy provide a mechanism to limit the maximum number of vehicles a single applicant can apply for funding to upgrade. It also provides mitigation for the risk of oversubscription of the funds by larger fleets and for the risk of the funds being abused / fraudulent activity. Therefore, revising the vehicle cap to five vehicles would provide further confidence that funding will be directed towards the smallest businesses and individuals (identified to be most vulnerable to negative socioeconomic impacts from a GM CAZ, least likely to be able to afford to upgrade). This would therefore help those groups most likely to be operating non-compliant fleets and less likely to be able to afford to upgrade those fleets without support to upgrade and therefore improve air quality benefits. This contributes to achieving compliance in the shortest possible time and increases the certainty that compliance can be achieved.

9.11.4 **Outcome:** Change in GM Clean Air Plan Policy, with the exception of the Clean Bus Fund, the maximum number of vehicles an applicant can receive funding for to be set at five vehicles per Applicant across all vehicle types.

9.12 **Vehicles that operate in GM and will be affected should be eligible for funding support (including those beyond the boundary)**

9.12.1 **Issue:** Respondents stated that all companies/operators that operate in Greater Manchester should be eligible for funding support, regardless of whether the business is registered within Greater Manchester or not.

9.12.2 **Response:** Greater Manchester is requesting a package of financial support from Government totalling over £150m to support owners or registered keepers of non-compliant vehicles to upgrade to compliant vehicles. The funding is seeking to prioritise individuals, micro and small businesses and those most likely to be impacted by the Clean Air Zone charges with vehicles registered or licensed within Greater Manchester.

9.12.3 The UK plan for tackling roadside nitrogen dioxide concentrations states that local authority plans should “target measures to minimise their impact on local residents and businesses” and also mentioning the “specific needs of each local area”[81] which is consistent with GM CAP’s approach to target funding for vehicles registered in Greater Manchester.

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[81] Defra and DfT, UK plan for tackling roadside nitrogen dioxide concentrations: detailed plan (July 2017), available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/633270/air-quality-plan-detail.pdf

9.12.4 Under the GM CAP, a business based within Greater Manchester that owns and operates non-compliant vehicles is more likely to be impacted by the Clean Air Zone charges whenever it operates a vehicle in its fleet, regardless of whether the vehicle is destined for Greater Manchester or outside of Greater Manchester. Whereas, a non-Greater Manchester business would have a greater level of flexibility to choose not to enter Greater Manchester, therefore not be charged via the Clean Air Zone. The funds would seek to address those businesses which are most impacted by the GM Clean Air Zone charge which is more likely to be a Greater Manchester based business. Therefore, it is not proposed to change the eligibility criteria within the initial three rounds of funding as consulted through the Clean Commercial Vehicles Fund – Management of Funds.

9.12.5 However, where there is residual funding following the Clean Commercial Vehicles Fund funding rounds, consideration may also be given to provide funding to those outside of Greater Manchester who operate within Greater Manchester. This consideration will be subject to available funds, following the introduction of GM Clean Air Zone charges, once all temporary exemptions have ended and following the existing funding rounds. This option will remain under consideration until a decision is made by the appropriate joint committee. The proposal would utilise existing fund amounts and would only be considered in the event of residual funding.

9.12.6 **Outcome:** Change in GM Clean Air Plan Policy the Air Quality Administration Committee[82] to have the authority to consider possible changes to the eligibility criteria, including opening up the Funds to vehicle owners outside GM.

9.13 **More funding for buses should be available**

9.13.1 **Issue:** The GM CAP Policy for Consultation included a proposal of a £16,000 grant towards replacing non-compliant buses that operate on GM registered bus services. Some respondents commented that the funding should be higher with concerns amongst some respondents that if funding for bus operators was insufficient the costs would be passed onto customers or services cut.

9.13.2 **Response:** Retrofitting vehicles is the most cost-effective route to compliance, where available. Where this is not possible because buses are older than 13 years, or where there is no CVRAS accredited retrofit solution, a replacement fund is proposed. At this time, it is estimated that there are 437 buses that will need to be replaced and that may therefore claim funding from the Clean Bus Fund.

[82] A Joint Committee of charging authorities (the 10 GM Authorities) to enable decisions to be taken that are required to be taken jointly in relation to the Greater Manchester Clean Air Zone.

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9.13.3 £16,000 grant funding was proposed in the GM CAP Policy for Consultation, to provide consistency with the bus retrofit grant amount. There are several different vehicle types that operate registered bus services in Greater Manchester. In March 2020 TfGM collated typical costs for new buses across various models and manufacturers (Volvo, Yutong, ADL and Optare). It is noted that there is no second-hand market for most vehicles considered in the Clean Bus Fund.

Vehicle	Average Cost
Minibus	£60,000
Midi bus	£146,000
Single deck bus	£158,000
Double deck bus	£218,000
Coach	£223,000

9.13.4 The average residual value in the fleet is £15,000. The majority of buses that require replacement on GM registered bus services are single-deck buses (42% of the estimated total). A £16,000 grant would provide the 10% deposit required to purchase a new single-deck bus and thus typically should facilitate upgrade where operators choose to do so, depending on their circumstances.

9.13.5 When looking at other cities that are implementing a CAZ and where replacement funding for bus was offered, similar funding amounts have been proposed.

9.13.6 **Outcome:** No change in GM Clean Air Plan Policy

9.14 **Funding should only be available for smaller bus companies**

9.14.1 **Issue:** The Policy for Consultation proposed that any bus operator running a GM registered bus service may be eligible for funding, providing they meet the eligibility criteria, regardless of the size of the company. Some respondents commented that funding should only be given to smaller companies.

9.14.2 **Response:** The upgrade of buses is central to meeting compliance with legal limits for NO_2 concentrations in GM. The funding to retrofit non-compliant buses operating on a registered bus service within GM was opened to applications in December 2020 and was not part of the consultation. Prior to this, the Government confirmed that it should be delivered as a continuation of the Clean Bus Technology Fund.

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9.14.3 Government have awarded £3.2m to support the replacement of non-compliant vehicles for small and medium sized bus operators, operating on registered bus services in GM. A grant of £16,000 is available towards the cost of replacing a non-compliant vehicle used on a registered bus service within GM with a compliant vehicle which meets GM CAZ emission standards.

9.14.4 Applicants for Replacement funding will need to demonstrate that they are the registered operator for a registered bus service operating in GM, that they are a small (including micro business / entity) or medium-sized business as well as a number of other criteria which can be found in Appendix 1 of the June 2021 GMCA report.

9.14.5 Outcome: Change in GM Clean Air Plan Policy.

9.15 **Funding should only be available for upgrade to EV/hybrid buses**

9.15.1 **Issue:** GM proposes that a grant of up to £16,000 will be available towards the cost of replacing a non-compliant bus registered to run services across GM with a compliant vehicle which meets GM CAZ emission standards, of Euro VI. Some respondents commented that funding should only be given for low emission vehicles.

9.15.2 **Response:** JAQU's options Appraisal guidance notes state: "The overall spending objective of the local plan is to deliver a scheme that leads to compliance with NO_2 concentration limits in the shortest possible time".[83] With nearly 350 buses requiring replacement to meet compliance, it is not feasible to upgrade these buses to low emission vehicles in the timescales set. This is in part due to requirements to install the relevant infrastructure to support vehicles.

9.16 GM is looking at options for the long term rollout Zero Emission Buses (ZEB).

9.16.1 **Outcome:** No change in GM Clean Air Plan Policy.

9.17 **Buses operating on school bus contracts that are not compliant should be considered for a temporary exemption until the end of their contracts**

9.17.1 **Issue:** Feedback from the consultation explained that an estimated 39 non-compliant buses will be operating on school services from the start of the CAZ (assumed to be Spring 2022) until 31st July 2022 and will not be used on school services after this point.

[83] Joint Air Quality Unity, Third Wave Local Authorities – Guidance: Options Appraisal, p. 8.

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9.17.2 **Response:** It is proposed that any contracts that were tendered prior to the submission of the GM CAP OBC should be considered for a temporary exemption, as the preferred option for a CAZ and its standards was not confirmed until that point. This means that buses included in contracts that were tendered in or before January/February 2019 and which expire on or by 31st July 2022 will be the only buses considered for the temporary exemption.

9.17.3 The cost of a new Euro VI bus is approximately £158,000 for a single deck up to £218,000 for a double deck which is a large investment without a guarantee that the bus operator would win future school bus contracts.

9.17.4 The number of buses (39) included in this exemption is very small, and the exemption is only in place for two months, meaning that the impact on air quality would be negligible.

9.17.5 **Outcome:** Change in GM Clean Air Plan Policy, vehicles that are used for school contracts that were tendered prior to 31st March 2019 which expire on or by 31st July 2022 and which have not been renewed by GM for future services can apply for a temporary exemption to 31st July 2022. The vehicle must have been identified on the GM bus fleet register for at least 6 months. These vehicles will not be considered for funding under the GM CAP scheme. The vehicles must not be used for registered bus services within GM beyond 31 July 2022.

9.18 **The eligibility criteria should not inadvertently exclude buses operating on school services.**

9.18.1 **Issue:** Consultation feedback explained that eligibility criteria for buses to have been operating on a registered bus service for 12 consecutive months prior to the date of application will exclude buses running solely on school services as they don't operate for 12 consecutive months.

9.18.2 **Response:** School buses are assumed in the total fleet that needs to be compliant. Changing the eligibility criteria to ensure that school buses aren't excluded from replacement funding would avoid this issue.

9.18.3 **Outcome:** Change in GM Clean Air Plan Policy, such that where it can be demonstrated that the vehicle has been used on a school service for a full school year they will be considered as meeting the 12-month requirement.

9.19 **Funding for HGVs should be higher/current funding amount won't help/ can't afford to upgrade**

9.19.1 **Issue:** Respondents stated that the financial support offered through the Clean Commercial Vehicles Fund would not be sufficient for vehicle owners to upgrade to compliant vehicles. There appeared to be some misunderstanding in how grant values were set, in particular for the vehicle replacement amount (up to £5,500 dependent on weight).

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9.19.2 **Response:** The vehicle upgrade offer for HGVs is provided through a grant for retrofit and replacement or access to vehicle finance. The implementation of a Clean Air Zone is forecast to be highly effective in encouraging HGV upgrade and the grant funding acts as a mitigation measure only. In addition, non-compliant HGVs in GM tend to be, on average, approaching their natural end of operational life and therefore investment would not be brought forward significantly for vehicle owners in comparison with other vehicle types.

9.19.3 Based on the high cost to upgrade for HGV owners and feedback from the Consultation, it is proposed to increase the replacement grant offer, whilst retaining the retrofit offer at the same amount as at consultation. The HGV replacement grant value is proposed to be uplifted depending on the weight of the vehicle. The uplifted replacement grant offers are shown below:

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Weight	At consultation	Final GM CAP policy
Up to 7.5t rigid HGV (over 3.5t and up to 7.5t rigid HGV)	£2,500	£5,000
118t rigid HGV (over 7.5t and up to 18t rigid HGV)	£3,500	£7,000
26t rigid HGV (over 18t and up to 26t rigid HGV)	£4,500	£9,000
32t rigid HGV (over 26t and up to 32t rigid HGV)	£5,500	£12,000
44t84 HGV (up to 44t HGV)	£4,500	£6,500

9.19.4 The uplift in grants for HGVs has been recommended to reflect the impacts of COVID-19 on HGV operators, who are reporting lower turnover and profits than normal, and to reflect the fact that no temporary exemption is offered to this group. The grants offered were substantially lower than those offered by some other local authorities, and it was considered that higher grants would act as a greater incentive to upgrade and better mitigate the impacts of the CAZ.

9.19.5 The amount in grant uplift has been raised broadly proportionately however the 32t HGV weight class has been increased beyond 100% to reflect the high cost of HGVs under this weight category, which it was felt had not been fully reflected in the previous offer. The funding for articulated HGVs has been increased by proportionately slightly less than other vehicle weights, taking into account the higher vehicle depreciation costs of this vehicle (due to the shorter average vehicle operating life), compared to rigid HGVs, with second-hand vehicles notably more affordable than 26t rigid vehicles which have broadly similar new vehicle prices.

9.19.6 The changes in grant values will reduce the cost burden to HGV owners and recognize the impact of COVID-19 on the industry and will mitigate against the risk of low funding uptake. The replacement grant values will remain variable by vehicle weight, recognising the large variations in the cost of HGVs.

9.19.7 **Outcome:** Change in GM Clean Air Plan Policy, HGV replacement grant amounts have increased, depending on size and weight.

[84] Weights given are Gross Vehicle Weight (GVW) - the weight of a vehicle or trailer, including the maximum load, that can be safely carried when it is being used on the road. This are listed in the owner's manual. Also known as the maximum authorised mass (MAM) or permissible maximum weight.

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9.20 **Funding for leisure vehicles should be increased due to unaffordability of upgrade**

9.20.1 **Issue:** respondents' comments centred around the cost of upgrading leisure vehicles. Respondents suggested that a greater amount of financial support should be available. This included suggestions that the costs of upgrade would be higher than other commercial vehicle types within the scope of the CCVF.

9.20.2 **Response:** Based upon consultation feedback, the available grant amounts and Vehicle Finance contribution available through the Clean Commercial Vehicle Fund, for LGV and HGV vehicles, will be increased. Eligible owners, including private owners of vehicles (HGV or LGV) used for leisure purposes, based within GM, will be able to apply for funding support towards the upgrade of non-compliant vehicles, through either retrofit or replacement options.

9.20.3 There is also a proposal that eligible owners of non-compliant HGVs in private ownership that are commonly categorised under the DVLA's 'Private HGV Tax Class' will be able to apply for a permanent local discount. In this instance, the vehicle would be eligible for consideration for a charge equivalent to the LGV daily charge (proposed to be £10 a day), rather than the HGV daily charge (proposed to be £60 a day).

9.20.4 **Outcome:** Change in GM Clean Air Plan Policy, HGV replacement grant amounts updated as per 9.18

9.21 **Funding for LGVs should be higher due to unaffordability to upgrade**

9.21.1 **Issue:** Respondents stated that the financial support offered through the Clean Commercial Vehicles Fund would not be sufficient for vehicle owners to upgrade to a compliant LGV.

9.21.2 **Response:** The LGV grant proposed at consultation for the replacement of non-compliant LGVs registered in GM was £3,500, with access to vehicle finance for replacement of non-compliant vehicles, offering a finance contribution capped at £5,000 per vehicle.

9.21.3 At the time the current proposals were developed, there were no Clean Vehicle Retrofit Accreditation Scheme (CVRAS) approved retrofit technologies for LGVs and thus only a vehicle replacement grant, alongside vehicle finance, were developed as part of the proposed offer. However, in the published CVRAS list of approved companies and emission reduction systems, released after the closure of the GM CAP consultation, dated 22 December 2020, a vehicle retrofit solution has been approved for six different models of van (all Euro 5). Although there are a number of solutions being developed, only those that are CVRAS certified can be accounted for in the CAP proposals.

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9.21.4 The inclusion of an LGV retrofit offer will enable vehicle owners who have a retrofittable vehicle to reduce their cost burden by eliminating close to, or all, of the cost required to upgrade their vehicle. In addition, vehicle retrofitting eliminates additional costs associated with new vehicle customisation such as vehicle liveries.

9.21.5 The grant and vehicle finance offers will target individuals, micro and small businesses (in addition to charities and social enterprises) who would be most vulnerable to the CAZ. These groups typically have a higher uptake of second and third hand vehicles and therefore currently have a higher proportion of non-compliant vehicles.

9.21.6 The GM CAP evidence on COVID-19 impacts highlighted that LGVs experienced a mixed impact from the pandemic, dependent on sector and business size, with some sectors experiencing growth in demand and others facing lengthy periods of closure. Although LGV traffic volumes recovered quickly after the initial lockdown, the impact of the initial lockdown period and later restrictions has had a material impact on businesses' finances with the construction industry, as an example, experiencing a 25% drop in output in 2020. Over three quarters of freight respondents stated at consultation that they had been financially impacted by the pandemic.

9.21.7 As a result, it is proposed that the LGV replacement grant is uplifted for larger LGVs, to better reflect the higher cost of upgrading these vehicles. It is proposed that the replacement grant for smaller LGVs remains the same, as the grant of £3,500 provides a high proportion of the cost of upgrade of smaller vehicles. The uplifted replacement and retrofit grant offers are shown below:

Type of grant	Amount proposed
Replacement grant: under 1.6t LGV:	£3,500
Replacement grant: over 1.6t LGV and up to 3.5t	£4,500
Grant for retrofit	£5,000

9.21.8 **Outcome:** Change in GM Clean Air Plan Policy, LGV replacement grant amounts updated as per 9.20.7.

9.22 **Funding for coaches should be higher due to affordability to upgrade**

9.22.1 **Issue:** Respondents stated that the financial support offered through the CCVF would not be sufficient to upgrade to compliant vehicles. Some coach operators felt that the fund will not be sufficient to help, especially given the economic impact of COVID-19 on the industry. Most gave examples of the prohibitive cost of a compliant vehicle and the gap between the proposed funding and the cost of a new vehicle.

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9.22.2 **Response:** The Policy for Consultation outlined support for coach operators of a grant of up to £16,000 per vehicle towards retrofit or replacement of a non-compliant coach, or alternatively, access to vehicle finance for replacement, capped at £23,000 per vehicle. Applicants to the CCVF would have to demonstrate that they are either a small business, micro business, self-employed / sole trader, charity, social enterprise or private owner, with support limited to a maximum of 10 vehicles per applicant.

9.22.3 Whilst retrofit offers good value for money, this option is only available for coach models with an approved solution and is only considered a viable option for Euro IV or Euro V coaches. This means that a large portion of the non-compliant coach fleet may face high upgrade costs of up to £280,000 for a new vehicle, or £115,000 - £245,000 for a second-hand compliant vehicle. In addition, the average residual value of vehicles in the GM coach fleet is low.

9.22.4 The coach sector is characterised by small businesses, with 69% of GM operators having a fleet size of between 1 and 5. Whilst there are high rates of non-compliance amongst operators of all sizes, non-compliance is particularly prevalent amongst the smaller operators, who are likely to have modest income and may not have the capital required to upgrade their vehicles.

9.22.5 GM CAP evidence on COVID-19 impacts demonstrates that the coach industry has been severely impacted by the pandemic. There has been no specific financial support provided to the coach industry, unlike other regulated public transport services such as scheduled rail and bus services. This is likely to have further impacted the ability of the coach industry to respond to the Clean Air Zone.

9.22.6 Therefore, it is proposed that increasing the replacement grant value from £16,000 to £32,000 per vehicle is appropriate. This would make it more likely that vehicle owners could supply a deposit towards a compliant new or second-hand vehicle, recognising that there may not be good availability of second-hand compliant vehicles. The high value of the grant reflects both the high cost of upgrade, the low residual value of the existing vehicle fleet and consequently the large 'affordability gap', and the serious impact of the pandemic on this group.

9.22.7 **Outcome:** Change in GM Clean Air Plan Policy, replacement grant value for coaches is increased to £32,000 per vehicle. It is proposed that the replacement grant would only be available for coach models that have no retrofit solution. Retrofit grant funding of £16,000 to be retained.

9.23 **Funding for minibuses should be higher due to affordability to upgrade**

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9.23.1 **Issue:** Respondents stated that the financial support offered through the CCVF would not be sufficient to upgrade to compliant vehicles. A number of minibus operators in the qualitative consultation focus groups felt that the fund will not be sufficient to help, especially given the economic impact of COVID-19. Most gave examples of the prohibitive cost of a vehicle and the gap between the proposed funding and the cost of a new vehicle.

9.23.2 **Response:** The Policy for Consultation outlined support for minibus operators of a replacement grant of up to £5,000 per vehicle, or access to vehicle finance, with the finance contribution per vehicle capped at £7,000. In comparison to other modes, this offer is relatively high in proportion to upgrade costs.

9.23.3 At the time the proposals were developed, there were no approved retrofit technologies for minibuses, so no retrofit offer was included in the offer. However, certified retrofit solutions have now come on to the market for a number of Euro 5 minibus models and it is likely that further models will be accredited in the next 12 months.

9.23.4 The inclusion of a minibus retrofit offer will enable vehicle owners who have a retrofittable vehicle to reduce the cost burden of upgrade, by covering most or all of the cost to upgrade to a compliant standard with the requirements of the CAZ. This option may also be desirable for operators as it eliminates additional costs associated with new vehicle customisation, such as vehicle liveries.

9.23.5 **Outcome:** Change in GM Clean Air Plan Policy, a retrofit grant is offered at £5,000 per vehicle in line with the grant offered for replacement[85]. No change in proposed grant level for minibuses, grant remains unchanged at £5,000.

9.24 **Funding for Hackney Carriages should be higher due to affordability to upgrade**

9.24.1 **Issue:** Respondents stated that the financial support offered through the Clean Taxi Fund (CTF) would not be sufficient to enable owners and operators to upgrade non-compliant Hackney Carriages. Reasons for this included the high cost of upgrading to a compliant vehicle, which would be prohibitive even with financial support. Some identified that COVID-19 has caused increased financial hardship within the taxi trade due to reduced passenger demand, which has made upgrade less affordable.

9.24.2 **Response:** the Policy for Consultation outlined the following support for Hackney Carriage operators:

- A grant of up to £10,000 towards the running costs of purpose-built wheelchair accessible WAV zero-emissions capable (ZEC) vehicle; or

[85] subject to operational viability and further discussion with retrofitters to confirm the capacity of the supply chain

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- Access to vehicle finance towards the cost of upgrade to a purpose-built wheelchair accessible ZEC vehicle, offering an average finance contribution of £10,000, with the total finance contribution capped at £14,000; or

- A grant of £5,000 towards the liquefied petroleum gas (LPG) retrofit of a Euro 5 vehicle less than ten years old.

9.24.3 Hackney Carriages offer valuable transport services to GM residents, providing accessibility to vulnerable groups that would otherwise be isolated, including those with mobility issues such as the elderly or those with disability, injury or ill health. Hackney carriages are particularly important to wheelchair users, with 88% of GM licensed Hackney Carriages being wheelchair accessible compared with only 1% of PHVs.

9.24.4 Consultation feedback and GM CAP evidence on COVID-19 impacts demonstrates that the Hackney Carriage and PHV industry has been significantly impacted by the pandemic. The national lockdowns and local restrictions have impacted travel, tourism and the night-time economy which are all vital to the industry. Reduced trade has financially impacted Hackney drivers, who are likely to be self-employed and particularly sensitive to the economic impact of the CAZ, leaving them less able to respond to the CAZ. Without appropriate mitigations, there is a risk that drivers will leave the trade.

9.24.5 As previously noted, whilst the MLS will complement the GM Clean Air Plan, common vehicle standards will not be in place prior to the launch of the GM Clean Air Zone. Therefore, licensing conditions will not be used at this stage to support delivery of the GM Clean Air Plan, however, all future conditions around vehicle standards will complement this activity. As a result, the funding offer for Hackney carriages now includes new funding options, allowing for the upgrade to a new or second-hand Euro 6 (rather than ZEC) vehicle, a second-hand ZEC and for the upgrade to a non-WAV where that is in line with local licensing policy. The wider range of funding options for Hackney carriages should provide a more affordable route to upgrade.

9.24.6 It was not considered appropriate to increase the funding offer for WAV ZEC Hackney carriages as this is equivalent to the best funding offer available anywhere in the country, as far as GM is aware. However, it was considered appropriate to widen the offer to provide funding for upgrade to a compliant WAV Hackney carriage, with funding set at the same amount offered to minibuses, reflecting the similar upgrade costs.

9.24.7 At the time the proposals were developed, the only approved retrofit technologies for Hackney carriages was for LPG retrofit. However, certified retrofit solutions have now come on to the market for at least one Euro 5 model. Therefore, an expanded retrofit offer is proposed, providing funding for any relevant CVRAS-certified retrofit solution.

9.24.8 **Outcome:** Change in GM Clean Air Plan Policy, the financial support offered to Hackney Carriages (and PHVs) is revised in line with the below offers:

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Vehicle Type		Retrofit grant (per vehicle)	Replacement grant (per vehicle)	Grant & Vehicle Finance (Replacement) (per vehicle)	Vehicle Finance (Replacement) (per vehicle)	Running Cost Grant (per vehicle)
Purpose-built Wheelchair Accessible Vehicle	**New Zero Emissions Capable (ZEC)[86]**	Not available	Not available	Up to £10,000	Up to £10,000	Up to £10,000
	Second-hand ZEC	Not available	£10,000	Up to £10,000	Up to £10,000	Not available
	Compliant Vehicle (Euro 4 petrol or Euro 6 diesel or better)	Up to £5,000	£5,000	Up to £5,000	Up to £5,000	Not available
Non-Wheelchair Accessible Vehicle	**New Zero Emissions Capable (ZEC)**	Not available	Not available	Up to £6,000	Up to £6,000	Up to £6,000
	Second-hand ZEC	Not available	£6,000	Up to £6,000	Up to £6,000	Not available
	Compliant Vehicle 6+ seats (Euro 4 petrol or Euro 6 diesel or better)	Up to £5,000	£5,000	Up to £5,000	Up to £5,000	Not available
	Compliant Vehicle (Euro 4 petrol or Euro 6 diesel or better)	Up to £5,000	£3,000	Up to £3,000	Up to £3,000	Not available

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9.25 **Electric Hackney Carriages are not suitable, the infrastructure is not in place**

9.25.1 **Issue:** Many respondents who commented stated that EV taxis are not suitable for the trade, they are too expensive, there are problems with batteries, range, reliability and there is not enough EV infrastructure available to meet demand.

9.25.2 **Response:** Although GM is proposing to retain the ZEC grant, as set out above there is also a proposal to offer a new grant to support upgrade to a compliant internal combustion engine (ICE) vehicle recognising that ZEC vehicles may not be affordable or suitable for all drivers at the moment.

[86] A Zero Emissions Capable (ZEC) Vehicle is defined as having CO_2 emissions of less than 50g/km and a zero emission range of at least 70 miles, as defined by Government, available at: https://www.gov.uk/plug-in-car-van-grants/eligibility

9.25.3 **Outcome:** Change in GM Clean Air Plan Policy, Hackney carriages can upgrade to a compliant ICE vehicle as well as a ZEC vehicle.

9.26 **Support should be offered to those who have already upgraded**

9.26.1 **Issue:** there was feedback from some Hackney and PHV respondents that the funding was unfair to those who had recently upgraded their vehicles. Some felt that those who had acted responsibly by adopting greener vehicles were being penalised.

9.26.2 **Response:** the funding support packages are being put in place to help owners or registered keepers of non-compliant vehicles to mitigate the negative socio-economic effects of the GM CAZ charge. The funding is therefore to support the upgrade of parallel or out-of-cycle investments that could have a negative effect on individuals and businesses. It is a principle of all funds that funding is to be used to retrofit or replace an existing non-compliant vehicle, in use at the time of application. Vehicles purchased prior to the launch of the funding cannot be considered to have been purchased as a direct result of the scheme and therefore no mitigation would be required. The eligibility criteria for the Clean Taxi Fund are therefore designed to promote the upgrade of eligible non-compliant hackneys and private hire vehicles in the fleet from the time of its launch onwards, not to provide retrospective funding for upgrades that have already occurred.

9.26.3 **Outcome:** No change in GM Clean Air Plan Policy.

9.27 **Oppose first-come-first-served for the Clean Taxi Fund, should go to those who need it most**

9.27.1 **Issue:** Some respondents opposed the first-come-first served approach to the management of the Clean Taxi Fund funding or felt that it was unfair on the basis that first-come-first-served could risk disproportionately benefitting those who are already engaged with the system, whist those on the periphery are missed. Some respondents commented that whilst first-come-first served was a fair method of distribution, it was important that there was enough funding for latecomers. There were some concerns about larger companies accounting for/receiving the majority of funds available. Some respondents argued that taxi funding should go towards those that need the greatest amount of financial support or that it should be means tested.

9.27.2 **Response:** The adoption of additional eligibility criteria, or alternatively, the adoption of means testing, were not recommended for the following reasons:

9.27.3 Means testing could present operational challenges that could slow the rate of distributing funding to support the upgrade to compliant vehicles, which, in turn, could impact upon NO_2 compliance and the overall objectives of the GM CAP.

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9.27.4 There are already measures in place that address the some of the concerns raised by stakeholders, including a cap on the number of vehicles an applicant can receive funding for, which addresses the concern that larger operators could diminish the funds by upgrading large fleets.

9.27.5 The amount of funding that has been confirmed by Government to date means that the fund is unlikely to be oversubscribed, as the level of funding confirmed is expected to likely to provide financial support to a large proportion of eligible owners.

9.27.6 The introduction of additional eligibility criteria / means testing could be a barrier to taxi drivers in terms of accessing support, e.g. requirements to demonstrate income, particularly in the context of impacts on income/business records due to COVID-19 and potential language/literacy barriers.

9.27.7 However, the concerns expressed by respondents did make a case for consideration of a proposal of a first tranche of Clean Taxi Fund applications for owner-drivers, i.e. limited to a single vehicle per applicant, as a means of prioritising the funding towards those who are most vulnerable to a CAZ charge. This is expected to be an effective way to ensure a fairer distribution of the Clean Taxi Fund, whilst maintaining overall scheme objectives and would be particularly valuable in the context of Private Hire Vehicle sector where there are some larger fleets.

9.27.8 **Outcome:** Change in GM Clean Air Plan Policy, funding rounds to be introduced whereby an initial round of funding will be open to all GM-licensed Hackneys and PHVs, with funding limited to one vehicle per Applicant, followed by a second round of funding open to all GM-licensed Hackneys and PHVs, with funding limited to the 5 vehicles per applicant cap.

9.28 **Funding should be higher for PHVs due to unaffordability to upgrade**

9.28.1 **Issue:** Respondents stated that the financial support offered through the CTF would not be sufficient to enable owners and operators to upgrade non-compliant PHVs. Reasons for this included the high cost of upgrading to a compliant vehicle, which would be prohibitive even with financial support. Some identified that COVID-19 has caused increased financial hardship within the taxi trade due to reduced passenger demand, which has made upgrade less affordable.

9.28.2 **Response:** The Policy for Consultation outlined the following support for PHV operators.

- PHV Wheelchair Accessible Vehicle (WAV) or minibus:
    - a grant of £5,000 towards the cost of a compliant 6+ seater, or access to vehicle finance, offering an average finance contribution of £5,000, with the finance contribution per vehicle capped at £7,000.

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- Non-wheelchair accessible PHVs:
    - A grant of £1,000 towards the cost of a compliant internal combustion engine vehicle or access to vehicle finance, offering an average finance contribution of £1,000, with the finance contribution per vehicle capped at £2,000; or
    - A grant of £2,000 towards the cost of a compliant hybrid or plug-in hybrid, or access to vehicle finance, offering an average finance contribution of £2,000, with the finance contribution per vehicle capped at £3,000; or
    - A grant of £2,500 will be available towards the running costs of a zero-emissions capable (ZEC) vehicle.

9.28.3 Consultation feedback and GM CAP evidence on COVID-19 impacts demonstrates that the PHV industry has been significantly impacted by the pandemic. The national lockdowns and local restrictions have impacted travel, tourism and the night-time economy which are all vital to the industry. Reduced trade has financially impacted taxi drivers, who are likely to be self-employed and particularly sensitive to the economic impact of the CAZ, leaving them less able to respond to the CAZ. Without appropriate mitigations, there is a risk that drivers will leave the trade.

9.28.4 GM has reviewed the proposed funding offer for PHVs and included new funding options, allowing WAV PHVs to access the same funding offers as WAV Hackney carriages, and providing funding for upgrade to a second-hand ZEC. It is proposed that the funding support for upgrade to a compliant Euro 4 petrol or Euro 6 diesel, compliant hybrid or new ZEC vehicle is uplifted to better mitigate the costs of upgrade and to reflect the impact of the pandemic on this group. The wider range of funding options and increased funding support for PHVs should provide a more affordable route to upgrade and supporting air quality benefits.

9.28.5 At the time the proposals were developed, there were no approved retrofit technologies for minibuses operating as PHVs or WAV PHVs, so no retrofit offer was included in the offer. However, certified retrofit solutions have now come on to the market for a number of Euro 5 minibus models and it is likely that further models will be accredited in the next 12 months.

9.28.6 The inclusion of a retrofit offer will enable vehicle owners who have a retrofittable vehicle to reduce the cost burden of upgrade, by covering most or all of the cost to upgrade to a compliant standard with the requirements of the CAZ. This option may also be desirable for operators as it eliminates additional costs associated with new vehicle customisation, such as vehicle liveries.

9.28.7 **Outcome:** Change in GM Clean Air Plan Policy, the financial support offered to PHVs (and Hackney Carriages) is revised as set out previously in 9.27.2

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9.29 **Opposition to the Try-Before-You-Buy (TBYB) Hackney Carriage Scheme**

9.29.1 **Issue:** several respondents aired concerns around the scheme, some stated that vehicle owners would not be able to afford to upgrade afterwards or that EVs would not be suitable. However, the majority of respondents commenting on the scheme were in favour and others asked if it could be extended to other vehicle types including PHV and LGV.

9.29.2 **Response:** Government have offered £0.5m towards GM's ask of £1.69m. This is not sufficient to deliver TBYB. GM therefore propose to reallocate the funding to provide an additional 6-8 charge points dedicated for use by taxis.

9.29.3 **Outcome:** the scheme will not be taken forward, due to insufficent government funding.

9.30 **Taxi electric vehicle charging infrastructure (EVCI) – increase of infrastructure required in GM**

9.30.1 **Issue:** Respondents' comments were supportive of increasing EVCI across GM in order to help people and the Hackney and PHV industries transition to EV providing confidence that there is enough infrastructure to cope with demand.

9.30.2 **Response**: Greater Manchester's publicly owned charging points are part of the Be.EV network. GM has a number of ongoing projects to increase the number of charging points. This includes the CAP Taxi EVI project which will provide dedicated taxi charging posts for Hackneys and PHV across GM[87].

9.30.3 **Outcome:** No change in GM Clean Air Plan Policy, however the £0.5m of funding that is sufficient to deliver TBYB is to be reallocate to provide an additional 6-8 charge points dedicated for use by taxis, as per 9.28.2.

9.31 **More funding is needed in the Hardship Fund**

9.31.1 **Issue:** feedback from the consultation captured that a key area of concern was the stated funding amount that was to be made available was not significant enough to ensure that all those who need funds would receive them. These concerns have been heightened by concerns about the impact of COVID-19 and the UK leaving the EU.

9.31.2 **Response:** Although feedback from the consultation and the impact of COVID-19 research found that further support was required for GM businesses, Government Ministers do not agree that a Hardship Fund is the best way to mitigate the impact of uncertainty due to the pandemic. Ministers cite other COVID-response government schemes (not specific to Clean Air plans) being available to address wider business impacts.[88] A Hardship Fund is, therefore, not included in the proposed final GM Clean Air Plan.

[87] More information can be found here be-ev.co.uk
[88] Further information is available in the GMCA report for the 25 June 2021 GMCA meeting

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9.31.3 However, Government have confirmed that they wish to ensure that Clean Air Funds can be adapted if necessary; and, that they will continue to work with GM to collectively understand the situation, including the funding position, if the impacts prove to be more severe than forecast. JAQU officials have agreed that a mechanism for this assessment will be agreed in advance of the funds opening in November 2021.

9.31.4 As further funding to address potential cases of hardship may be needed, Greater Manchester Authorities will be monitoring the situation very closely to ensure that they can take up the Government's offer to review the need for further funding if the need can be objectively demonstrated.

9.31.5 **Outcome:** Change in GM Clean Air Plan Policy, the GM Clean Air Plan no longer includes a Hardship Fund.

9.32 **General opposition to the Hardship fund**

9.32.1 **Issue:** Some members of the public were concerned that funding would go to individuals and businesses who do not need it and that those operating no-compliant vehicles should bear the costs themselves.

9.32.2 **Response:** A Hardship Fund is not included in the final GM Clean Air Plan.

9.32.3 **Outcome:** Change in GM Clean Air Plan Policy, the GM Clean Air Plan no longer includes a Hardship Fund.

9.33 **General opposition to the Hardship fund – disagree with the daily charges/won't help those affected**

9.33.1 **Issue:** Many respondents who opposed the Clean Air Zone in its entirety stated that a Hardship fund would not be required if there were no Clean Air Zone and that it would not help those most negatively affected.

9.33.2 **Response:** A Hardship Fund is not included in the final GM Clean Air Plan.

9.33.3 **Outcome:** Change in GM Clean Air Plan Policy, the GM Clean Air Plan no longer includes a Hardship Fund.

9.34 **Concerns about abuse/management of the Hardship Fund**

9.34.1 **Issue:** Consultation feedback identified members of the public and representatives are wary of potential abuse of the Hardship Fund applications process, thought it should be means tested and were concerned about larger firms having access to funding when it was not required.

9.34.2 **Response:** A Hardship Fund is not included in the final GM Clean Air Plan.

9.34.3 **Outcome:** Change in GM Clean Air Plan Policy, the GM Clean Air Plan no longer includes a Hardship Fund.

9.35 **Hardship funding should be prioritised for those who need it most/smaller businesses/voluntary sector etc.**

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9.35.1 **Issue:** Members of the public, businesses and representatives stated that further support for funding (through the proposed Hardship Fund) should be prioritised for smaller businesses, sole traders and charities.

9.35.2 **Response:** A Hardship Fund is not included in the final GM Clean Air Plan.

9.35.3 **Outcome:** Change in GM Clean Air Plan Policy, the GM Clean Air Plan no longer includes a Hardship Fund.

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10 Conclusions

10.1 An 8-week-long public consultation ran between 8 October and 3 December 2020 and 4,768 responses were received from businesses, organisations and the general public. The consultation adhered to the Government COVID-19 guidance around social distancing that was in place at that time. This meant that all engagement activity undertaken was online. However, promotion of the consultation used both digital and non-digital formats. They included advertising on social media, advertising in local newspapers and out of home adverts, such as billboards as well as radio advertising. There was also targeted advertising and engagement with the groups most likely to be impacted, such as the taxi trade, hauliers and van owners.

10.2 Members of the public and businesses and organisations could respond using the online survey, a paper form, which they could call an enquiry line for a copy to be sent to them, or pick up one from a Travelshop from across Greater Manchester. They could also respond by email or using the telephone. For non-English speakers a language line facility was available where a translator would also be present.

10.3 Alongside the consultation qualitative research was also undertaken, with a number of online focus groups sessions held, to further inform the consultation results.

10.4 Feedback from the consultation has been considered by GM and a series of changes are proposed to the GM Clean Air Plan. The changes have taken into account the consultation responses, the qualitative research, the Impact of COVID-19 and the Economic Impact research.

10.5 The proposals for the GM Final Clean Air Plan have been outlined throughout this document, in response to the issues that arose from consultation. The rationale for the changes or for proposals remaining the same has been explained at each section.

10.6 This information has highlighted:

- The support from the general public for the GM Clean Air Plan proposals and the implementation of a Clean Air Zone with mitigation measures.
- The concerns that businesses have around the proposals as well as some misconceptions about the GM Clean Air Zone and the funding to support vehicle upgrades.
- The adverse impact of COVID-19 on many impacted groups, including the Hackney carriage and private hire trade, coaches and some of the LGV and HGV sectors.
- The need for support measures to be in place for those impacted groups who need more time to upgrade their vehicles and financial support to do so. Changes have been made to temporary exemptions, to allow more vehicle owners more time to upgrade, and to increase and broaden the financial support offered.

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- Differences in businesses and organisations' needs, which is dependent on sector, vehicle type and location. This has led to changes to the Hardship Fund, where it is now proposed that local authorities will now deliver this fund to those who need it most in their locale.
- Access to funding must be fair. The policy for the management of funds will make sure that the smaller businesses and VCS organisations will have the opportunity to apply for funding first.
- Specific issues around Private HGVs and the need for parity of treatment of vehicles used for leisure purposes, such that vehicles should be charged at the same rate regardless of size. This is reflected in the Private HGV Tax Class vehicle discount, which offers a discounted charge to £10 for vehicles in the DVLA Private HGV Tax Class to provide parity of treatment of these vehicles.
- Other specific issues around discounts and exemptions, including the need for further permanent exemptions for vehicles used by disabled users. This will be incorporated into the revised policy, as well as permanent exemptions for training buses, heritage buses and a temporary exemption (until July 2022) for buses used on a GM school bus service tendered prior to March 2019.

10.7 There were many other issues and concerns raised within the consultation responses, as well as support for the proposals as they existed at consultation. That detail can be found in the AECOM report[89].

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[89] This document is supplied in Apprendix 3 of the June 2021 GMCA report

11 The GM Clean Air Final Plan

11.1 This section sets out the GM Clean Air Final Plan, in relation to the operations of the Clean Air Zone and what it means for each vehicle type.

11.2 Clean Air Zone

Clean Air Zone: Boundary	Primarily aligned with the administrative boundary of Greater Manchester Authorities excludes the Strategic Road Network (SRN)[90].The detailed boundary can be found here: cleanairgm.com/clean-air-zone-map Consultation to be undertaken on the inclusion of the A575 and A580 at Worsley[91].
Clean Air Zone: Times of Operation	24 hours a day, 7 days a week The anticipated implementation date is Monday 30 May 2022[92]
Clean Air Zone: Vehicles Affected	• Licensed Hackney Carriage • Licensed Private Hire Vehicle • Bus • Coach • Minibus • LGV • HGV

11.3 Proposals for Licensed Hackney Carriages – Government has awarded GM Local Authorities £9.5m.

Clean Air Zone: Exemptions	All Hackney Carriages which are licensed to one of the 10 Greater Manchester Authorities, as of the 3 December 2020 will be eligible for a temporary exemption until 31 May 2023.
Clean Air Zone: Discounts	None
Clean Air Zone: Daily Charge	£7.50 per charging day (midnight to midnight)
Clean Vehicle Funding	The following funding is available for upgrading a non-compliant Hackney Carriage to a purpose-built Wheelchair Accessible Vehicle (WAV): up to £5,000 towards retrofit to a compliant standard via a Clean Vehicle Retrofit Accreditation Scheme (CVRAS) certified system; OR

[90] The SRN consists of roads which are not managed by local and regional GM authorities, namely motorways and trunk roads managed by Highways England. The SRN is illustrated on the Highways England Network Management Map available at: https://www.gov.uk/Government/publications/roads-managed-by-highways-england

[91] Originally this section of the A575 and A580 at Worsley was excluded at consultation.

[92] Subject to joint GM and JAQU agreement on overall 'readiness', including that the Central Charging Portal and national Vehicle Checker is' GM ready

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	up to £10,000 towards the running costs of a new purpose-built WAV Zero Emissions Capable (ZEC) vehicle. This option is available when the compliant vehicle acquired with GM CAP funds has also been eligible for a Government plug-in grant; OR up to £10,000 towards a second-hand purpose-built WAV ZEC vehicle; OR, up to up to £5,000 towards a compliant purpose-built WAV vehicle (Euro 4 petrol or Euro 6 diesel or better). The following funding is available for upgrading a non-compliant taxi to a non-Wheelchair Accessible Vehicle: up to £5,000 towards retrofit to a compliant standard via a Clean Vehicle Retrofit Accreditation Scheme (CVRAS) certified system; OR up to £6,000 towards the running costs of a new Zero Emissions Capable (ZEC) ZEC vehicle; OR up to £6,000 towards a second-hand ZEC vehicle; OR up to £3,000 towards a compliant vehicle (Euro 4 petrol or Euro 6 diesel or better) Limit of 5 vehicles per applicant. GM estimates that the funding of £9.5m, received from Government would provide funding to upgrade around 1,130 vehicles.

11.4 **Proposals for Licensed Private Hire Vehicles** – Government has awarded GM £10.2m.

Clean Air Zone: Exemptions	All Private Hire Vehicles which are licensed to one of the 10 Greater Manchester Authorities, as of the 3 December 2020 will be eligible for a temporary exemption until 31 May 2023.
Clean Air Zone: Discounts	None
Clean Air Zone: Daily Charge	£7.50 per charging day (midnight to midnight)
Clean Vehicle Funding	The following funding is available for upgrading a non-compliant Private Hire Vehicle to a purpose-built Wheelchair Accessible Vehicle (WAV): up to £5,000 towards retrofit to a compliant standard via a Clean Vehicle Retrofit Accreditation Scheme (CVRAS) certified system; OR

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	up to £10,000 towards the running costs of a new purpose-built WAV Zero Emissions Capable (ZEC) vehicle. This option is available when the compliant vehicle acquired with GM CAP funds has also been eligible for a Government plug-in grant; OR up to £10,000 towards a second-hand purpose-built WAV ZEC vehicle; OR, up to up to £5,000 towards a compliant purpose-built WAV vehicle (Euro 4 petrol or Euro 6 diesel or better). The following funding is available for upgrading a non-compliant taxi to a non-Wheelchair Accessible Vehicle: up to £5,000 towards retrofit to a compliant standard via a Clean Vehicle Retrofit Accreditation Scheme (CVRAS) certified system; OR up to £6,000 towards the running costs of a new Zero Emissions Capable (ZEC) ZEC vehicle; OR up to £6,000 towards a second-hand ZEC vehicle; OR up to £3,000 towards a compliant vehicle (Euro 4 petrol or Euro 6 diesel or better) Limit of 5 vehicles per applicant. GM estimates that the funding of £10.2m, received from Government would provide funding to upgrade around 3,075 vehicles.

11.5 **Proposals for Buses** – Government has awarded GM Local Authorities £14.7 million for bus retrofit and £3.2m for bus replacement.

Clean Air Zone: Exemptions	There will be permanent exemptions for Heritage buses not used for hire and reward and driver training buses. Buses used on a GM school bus service tendered prior to March 2019 will have a temporary exemption that will end in July 2022.
Clean Air Zone: Discounts	None
Clean Air Zone: Daily Charge	£60 per charging day (midnight to midnight)
Clean Vehicle Funding	Bus retrofit - Up to £16,000 towards retrofit to a compliant standard via a Clean Vehicle Retrofit Accreditation Scheme (CVRAS) certified system

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	TBC - Bus replacement - Up to £16,000 for purchase or lease of a compliant vehicle The funding ask would provide funding to retrofit or towards upgrade of all non-compliant buses operating in GM, around 1,500 vehicles in total (noting that a further c350 are being retrofitted under the CBTF).

11.6 **Proposals for Coaches** – Government has awarded GM £4.4 million.

Clean Air Zone: Exemptions	All coaches not running on a registered bus service will be eligible for a temporary exemption until 31 May 2023.
Clean Air Zone: Discounts	None
Clean Air Zone: Daily Charge	£60 per charging day (midnight to midnight)
Clean Vehicle Funding	A grant of £32,000 per vehicle for replacement OR access to vehicle finance. OR a grant of up to £16,000 towards retrofit to a compliant standard via a Clean Vehicle Retrofit Accreditation Scheme (CVRAS) Limit of 5 vehicles per applicant. Government have provided funding of £4.4m, which would provide funding to upgrade around 174 vehicles.

11.7 **Proposals for Minibuses** – Government has awarded GM £2 million.

Clean Air Zone: Exemptions	Community Minibuses – Those operating under a permit under section 19 or section 22 of the Transport Act (1985), issued by a body designated by the Secretary of State are eligible for a permanent exemption. Minibuses specially adapted for a disabled user will be permanently exempted. Minibuses will be eligible for a temporary exemption until 31 May 2023.
Clean Air Zone: Discounts	None
Clean Air Zone: Daily Charge	£10 per charging day (midnight to midnight)
Clean Vehicle Funding	A grant of £5,000 per vehicle to replace or retrofit their vehicle OR access to vehicle finance, offering an average subsidy of £5,000, with the subsidy per vehicle capped at £7,000. Government has provided £2m in funding, which would provide funding to upgrade around 380 vehicles.

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11.8 **Proposals for LGV** – GM has been awarded £70 million to support LGV owners to upgrade or retrofit their vehicles.

Clean Air Zone: Exemptions	Light Goods Vehicles (LGVs) will be eligible for a temporary exemption until 31 May 2023. LGVs specially adapted for a disabled user will be permanently exempted.
Clean Air Zone: Discounts	None
Clean Air Zone: Daily Charge	£10 per charging day (midnight to midnight)
Clean Vehicle Funding	A grant of £3,500 for replacement of LGVs under 1.6t per vehicle OR access to vehicle finance, offering an average subsidy of £3,500, with the subsidy per vehicle capped at £5,000. A grant of £4,500 for replacement of LGVs over 1.6t and up to 3.5t per vehicle OR access to vehicle finance, offering an average subsidy of £4,500, with the subsidy per vehicle capped at £5,000. A grant of £5,000 for retrofit of LGVs. This would be limited to 5 vehicles per applicant. The £70 million funding would provide funding to upgrade around 15,900 vehicles.

11.9 **Proposals for HGV** – Government has awarded GM £7.6m.

Clean Air Zone: Exemptions	Specialist Heavy Goods Vehicles – Certain types of heavily specialised HGVs, such as those used in construction or vehicle recovery. Non-road-going vehicles – Certain types of non-road going vehicles which are allowed to drive on the highway such as agricultural machines; digging machines; and mobile cranes (T1, T2 or T3 vehicle types)
Clean Air Zone: Discounts	All vehicles classified under the Private HGV tax class to be eligible for a discounted charge of £10 per day.
Clean Air Zone: Daily Charge	£60 per charging day (midnight to midnight)
Clean Vehicle Funding	A grant of up to: <7.5t £5,000 <18t £7,000 <26t £9,000 <32t £12,000 <44t £6,500

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	per vehicle, dependent on vehicle size OR access to vehicle finance. OR a grant of up to £16,000 towards retrofit to a compliant standard via a Clean Vehicle Retrofit Accreditation Scheme (CVRAS) This would be limited to 5 vehicles per applicant. The Government fund received of £7.6m would provide funding to upgrade around 798 vehicles.

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Greater Manchester's Clean Air Plan to Tackle Nitrogen Dioxide Exceedances at the Roadside

Appendix 5 - Impacts of COVID-19 Report

Warning: Printed copies of this document are uncontrolled

Version Status:	DRAFT FOR APPROVAL	**Prepared by:**	Transport for Greater Manchester on behalf of the 10 Local Authorities of Greater Manchester
Date:	20 June 2021		

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1 Introduction

1.1 In Greater Manchester, the ten GM local authorities, the Greater Manchester Combined Authority (GMCA) and Transport for Greater Manchester (TfGM), collectively referred to as "GM", have worked together to develop a Clean Air Plan to tackle NO_2 Exceedances at the Roadside, referred to as GM CAP.

1.2 This document sets out the results of analysis carried out by GM to understand the possible impacts of the Covid-19 pandemic on the GM Clean Air Plan (GM CAP).

1.3 Since 2017, as a result of government direction Greater Manchester Authorities have been working together to develop a Clean Air Plan to tackle nitrogen dioxide (NO_2) concentrations at the roadside, referred to as the GM CAP. GM's proposals were prepared pre-Covid-19, based on best practice methods and data, and GM undertook to make an assessment of the possible impacts of Covid-19 to inform this technical briefing note for decision makers.

1.4 This note sets out evidence of the impact of the pandemic on travel patterns, vehicle purchase patterns, businesses and the economy, and considers the possible impact of Covid-19 on:

- Whether the assumptions underpinning the GM CAP are still valid;
- Whether GM will eliminate exceedances of legal nitrogen dioxide under the proposals as they currently stand;
- The measures proposed in the package for consultation; and
- Whether the proposed support package will be sufficient.

1.5 Without action, forecasting shows that GM is likely to remain in exceedance of legal limits for NO_2 concentrations until 2027. The focus of this report, therefore, is on the extent to which the impacts of the pandemic will continue into future years (2022 and beyond), in terms of the vehicles on the road, travel and traffic patterns, public transport supply and demand, and business and economic circumstances.

1.6 This document was drafted in April/May 2021, with the data and evidence included reflecting the situation up to March 2021, unless stated otherwise.

1.7 The evidence presented in this report has been considered in the review of the GM CAP Policy post-Consultation.

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2 Context of the GM CAP

2.1 Air pollution affects the health of people living, working and travelling in GM. Pollutants such as nitrogen dioxide (NO_2) - which is the harmful form of nitrogen oxides (NO_x) - and particulate matter ($PM_{2.5}$ and PM_{10}) are found at dangerous levels in many urban areas across the UK and particularly on busy roads.

2.2 Air pollution affects people's lungs, worsening respiratory issues such as asthma or bronchitis as well as cardiovascular problems, and reduces life expectancy. The air you breathe inside your vehicle can be dirtier than the air outside so people who spend a lot of time in their cars, taxis, vans or lorries are particularly at risk. Further information on the health impacts of poor air quality is set out in the Strategic Case of the Outline Business Case (OBC), available at https://cleanairgm.com/technical-documents/.

2.3 In 2017-2018, the ten local authorities of GM were instructed by the Government to produce a feasibility study i.e. a Clean Air Plan (CAP) to set out how they will target and mitigate areas of poor air quality within their boundaries. The GM local authorities have decided to submit a joint, GM-wide response to this request, which is being co-ordinated on behalf of the ten local authorities by Transport for Greater Manchester (TfGM).

2.4 The primary objective of the GM CAP is to achieve compliance with legal Limit Values in the shortest possible time. In line with Government guidance, this is the Determining Success Factor by which the programme is appraised.

2.5 GM's modelling carried out prior to the pandemic, predicted that there would be 203 points (sites of exceedance) along 160 stretches of road across GM where concentrations of NO_2 were forecast to be above legal limits in 2021. The local modelling identified that all ten GM local authorities would contain points of exceedance for NO_2 in 2021. Without action, compliance was not expected to be achieved in GM until 2027.

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2.6 Following submission of the OBC, which identified that a charging Clean Air Zone Class C (CAZ C) with additional measures was the best performing option and following submission of further evidence requested by the Government's Joint Air Quality Unit (JAQU), the ten GM local authorities were directed by the Government to introduce a CAZ C across the region. Certain vehicle types will pay a daily charge for driving inside the zone if they do not comply with emissions standards in the Government's CAZ Framework.[1] Non-compliant vehicles that will be charged are: Buses, Coaches, Minibuses, Hackney Carriages and Private Hire Vehicles (PHVs), Heavy Goods Vehicles (HGVs) and Light Goods Vehicles (LGVs).

2.7 GM proposed a Package for Consultation of funding and measures based on pre-Covid-19 assumptions and modelling. Alongside a charging CAZ category C, the package proposed support to help owners or registered keepers of non-compliant buses, coaches, HGVs, LGVs, taxis and minibuses with the cost of upgrading or retrofitting their vehicles, as well as a Try Before You Buy scheme for Zero Emission Capable (ZEC) hackney carriages; a network of 40 taxi-only rapid electric vehicle charging points; and a Hardship Fund of £10m.

2.8 Based on the pre-pandemic position, the Consultation Package was forecast to deliver the following benefits by 2025 including:

- All buses expected to be compliant;
- Close to 100% of HGVs operating in GM expected to be compliant, compared to around 89% without action;
- 91% of LGVs operating in GM expected to be compliant, compared to around 64% without action;
- 90% of hackney carriages operating in GM expected to be compliant, compared to around 64% without action; and
- 97% of PHVs operating in GM expected to be compliant, compared to around 86% without action.

2.9 The GM CAP was forecast to deliver total reductions in NO_x emissions from road traffic of 22% in 2023, a reduction of around 1,335 tonnes of NOx per year. Forecasting suggested that compliance would be achieved in 2024 across the whole of GM.

[1]Clean Air Zone Framework, UK GOV (2020) https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/863730/clean-air-zone-framework-feb2020.pdf

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2.10 In spring 2020, in the context of the Covid-19 pandemic, JAQU confirmed their continued commitment to delivering the GM CAP and asked GM to continue to develop the CAP and refrain from incorporating any possible economic impacts arising from the pandemic into the analysis prematurely. Accordingly, GM continued to progress interim deliverables as set out in the 2020 Ministerial Direction, whilst undertaking in parallel a programme of analysis and modelling to better understand the impacts of the Covid-19 pandemic on the GM CAP, the results of which are presented in this report.

2.11 In summer 2020, GM's 10 local authorities decided to proceed with a consultation on the GM CAP proposals as they stood prior to the pandemic. The purpose of the consultation was to seek views from residents, visitors, stakeholders and businesses on the proposals to achieve compliant NO_2 levels in Greater Manchester. The consultation sought feedback on how Covid-19 had affected businesses and organisations in GM. It took place from 8th October to 3rd December 2020 and 4,768 responses were received. The results of the consultation and GM's response to it are available at www.cleanairgm.com.

2.12 The results of the consultation have been considered alongside the results of the analysis presented here of the impacts of Covid-19 and have informed the development of a revised package of measures, set out in the proposed final GM CAP Policy. GM's modelling of air quality[2] has also been updated, to take account of the impact of Covid-19 and the revised post-Consultation package of measures. The initial results of this updated modelling are available on www.cleanairgm.com.

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[2] Supplied in the June 2021 GMCA report, see Appendix 6

3 Context of the Covid-19 Pandemic

Trajectory of the pandemic

3.1 In January 2020, Covid-19 first appeared in the UK, and in March 2020 the first national lockdown was implemented. By the 30th September 2020, there were an estimated total of 453,000 people testing positive for the virus in the UK with 42,000 cases resulting in deaths.[3] By the 31st March 2021, this had risen to an estimated total of 4.35 million people testing positive for the virus in the UK with 127,000 cases resulting in deaths.[4]

3.2 The Covid-19 global pandemic has introduced uncertainty into the GM CAP project. The transport sector and the economy as a whole has been significantly impacted by the pandemic, triggering the government to provide financial support packages to affected individuals and businesses to mitigate the financial impact on them. The sector's ability to recover from revenue loss, whilst also being expected to respond to pre-pandemic clean air policy priorities by upgrading to a cleaner fleet, has been considered and known impacts modelled through sensitivity testing. However, it should be recognised that at the time of the reporting, the future trajectory of the economy is still unknown and dependent on Covid-19 related factors such as testing, vaccinations and virus mutations, and on whether these result in further lockdowns or restrictions on activity and travel.

3.3 Since Covid-19 first emerged in the UK, the UK government has sought to balance public health against the economy taking into consideration the resultant impacts that changes to the state of the economy could have on job security. **Figure 3.1** provides a summary of the key Covid-19 events and Government responses during the pandemic and provides context on how people and businesses have been living and operating. GM-specific elements are highlighted by the red boxes.

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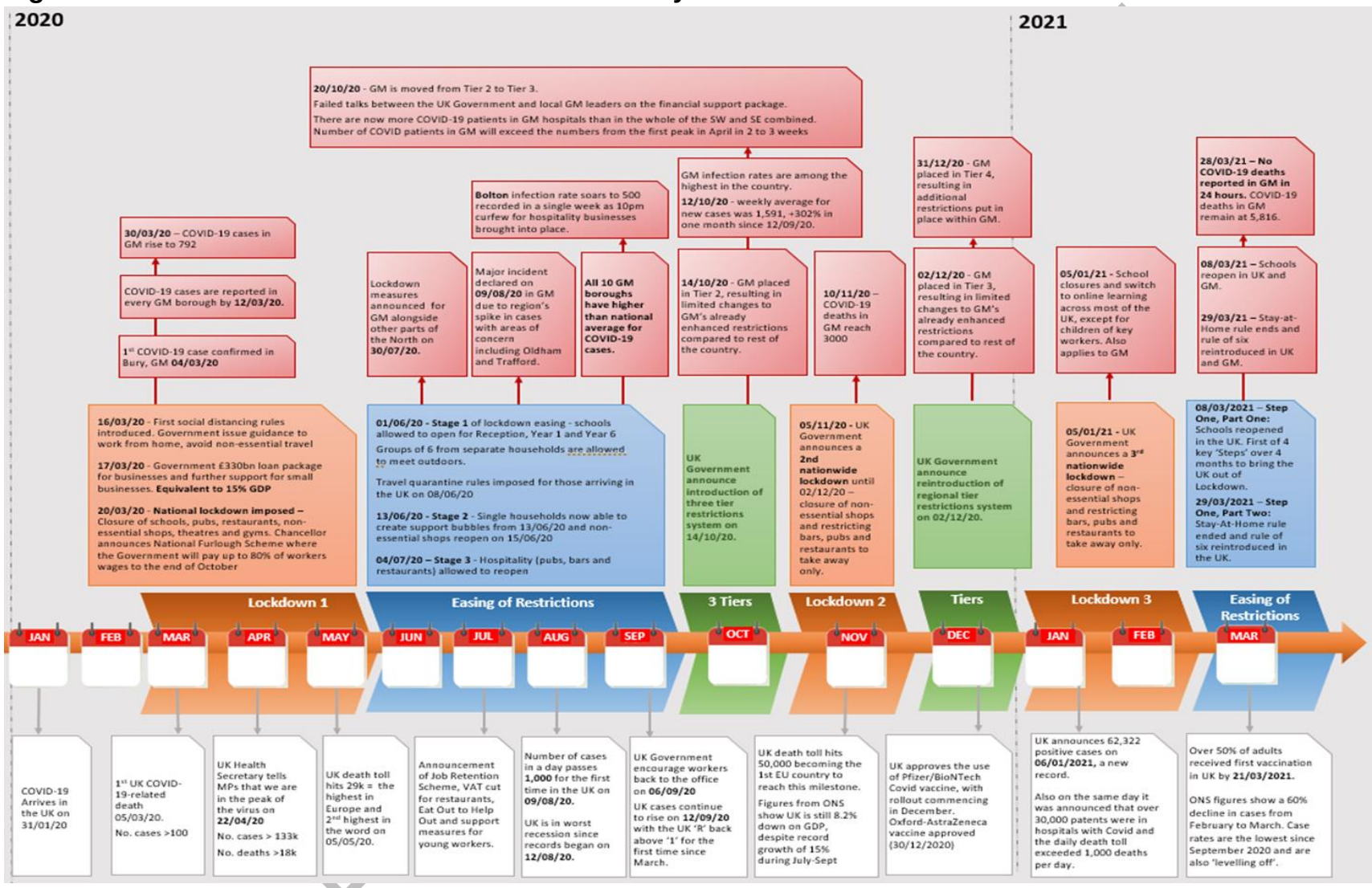
[3] Coronavirus (COVID-19) UK Government Dashboard, UK GOV (2021) https://coronavirus.data.gov.uk
[4] Coronavirus (COVID-19) UK Government Dashboard, UK GOV (2021) https://coronavirus.data.gov.uk

Figure 3.1 Covid-19 National and GM Timeline: January 2020 to March 2021



Source: AECOM

3.4 The high level of restrictions in place across March and April 2020 resulted in Covid-19 cases falling to the lowest level witnessed in the UK over the past twelve months, between 20,000 and 30,000 cases per month. The relaxation of restrictions over the summer of 2020 resulted in a sharp upturn in cases.

3.5 A regional approach to restrictions was in place from July 2020, and under this system GM had been placed under additional local restrictions measures because of a 'very high' COVID alert level and continuing increases in the infection rate across the GM region.

3.6 In October 2020 the government announced a three-tier system for lockdowns across England in order to 'simplify and standardise local rules'. As a result, on Wednesday 14th October England split into three Tiers, depending on the severity of the virus in the Local Authority area. Tier 3 restrictions came into effect on Friday, 23rd October 2020.

3.7 On the 5th November 2020, the government imposed a second lockdown with restrictions on gatherings and continued business activity in England between the 5th November and 2nd December. The restrictions included the closure of non-essential shops and hospitality for all but take-away food and drink.

3.8 At the end of the second lockdown England returned to a tiered system and GM was placed in Tier 3 before moving to Tier 4 (which amounted to lockdown measures) on 31st December 2020.

3.9 In January 2021, government imposed a third national lockdown. Throughout December 2020 and January 2021, Covid-19 cases peaked, surpassing 1 million cases in January 2021. Subsequently, the impact of the third national lockdown coupled with the acceleration of the vaccination programme has reversed the upward trend in Covid-19 case rates and enabled the government to gradually relax restrictions.

3.10 On the 22nd February 2021, the government announced detailed plans for the easing of lockdown in the UK. The timetable includes 4 stages, with a minimum of 5 weeks between each stage to collect and assess data. The first stage commenced on 8th March 2021 with the reopening of schools.

3.11 On 29th March 2021 the 'Stay at Home' order was lifted. Restrictions on non-essential retail and outdoor hospitality were lifted on 12th April 2021, and indoor hospitality was allowed to re-open from 17th May 2021, albeit under certain restrictions. The latest announcements mean that the end of government restrictions is scheduled for 19th July 2021.

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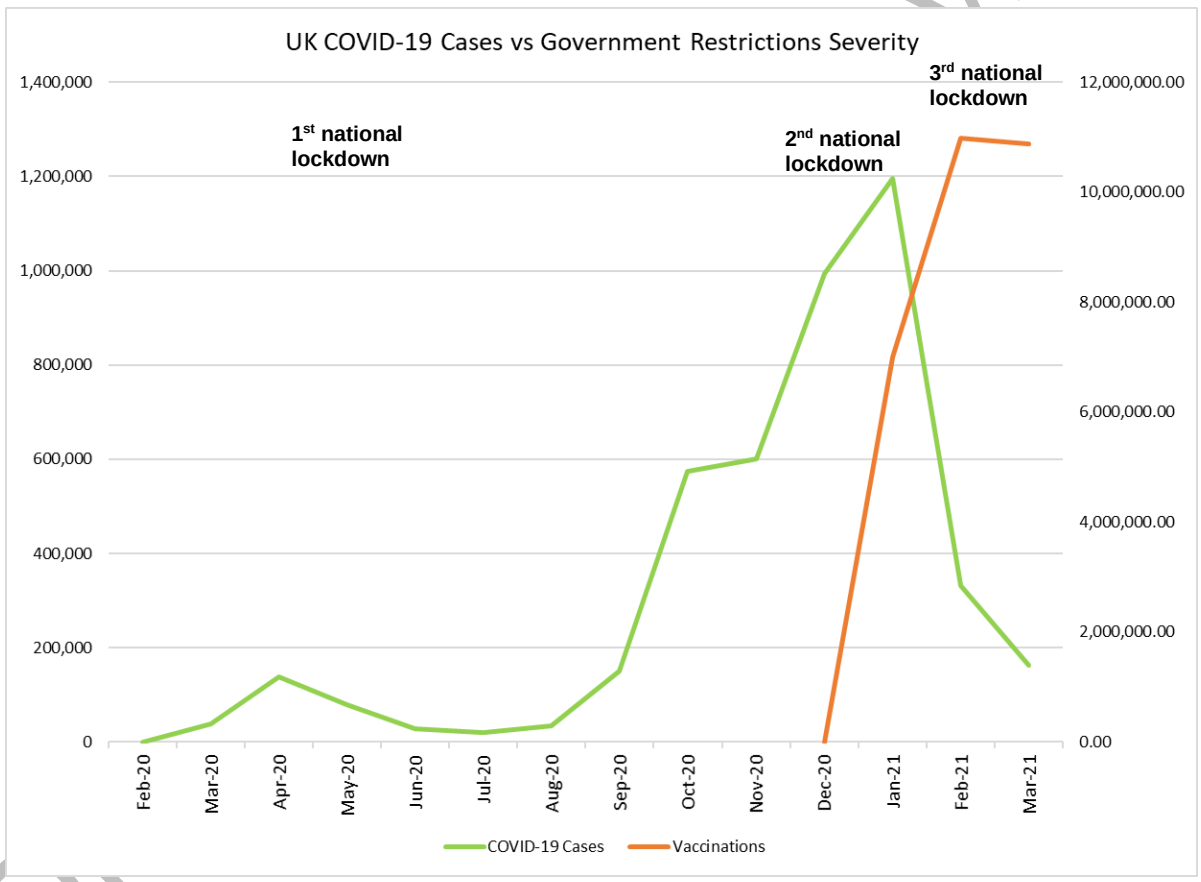
3.12 **Figure 3.2** shows an overview of the Covid-19 cases in the UK since the beginning of the pandemic, up to and including March 2021, mapped against the total number of people who have received their first dose Covid-19 vaccination. This demonstrates a clear relationship between the fall in Covid-19 cases and the ramping up of the vaccination programme. This stark correllation may be more evident at the start of the vaccination programme with vaccinations prioritised for the most vulnerable who are therefore less likely to be asymptomatic and go undetected. A more detailed overview of the UK's vaccination programme is provided in the section below.

Figure 3.2 UK Covid-19 Cases vs UK first dose Covid-19 Vaccinations



Source: UK Government Coronavirus Dashboard [5], 2021

3.13 It is important to also recognise the UK's acceleration in testing capabilities which may have accounted for the larger spike in Covid-19 cases over winter 2020 compared to the first lockdown.

[5] Coronavirus (COVID-19) UK Government Dashboard, UK GOV (2021) https://coronavirus.data.gov.uk/

Vaccine Programme

3.14 In December 2020, the UK government approved the Pfizer/BioNTech and Oxford-AstraZeneca vaccines, with the UK-wide vaccination programme commencing 8th December 2020.

3.15 The initial vaccination timeframe targets were for everyone over 70, the clinically extremely vulnerable, as well as frontline healthcare and social care workers, to be vaccinated by mid-February and the rest of the priority groups after that, by 4th of April.

3.16 The wider 'Phase 1', 'most at risk' groups, included people of 50 years and older, a total approximately of 25 million people, equivalent to a third of the UK's resident population. Government also announced that all remaining adults will be offered the vaccine by the end of July 2021.

3.17 In March 2021, the government announced that up to the end of January 2021, over 4 million vaccine doses had been administered to adults aged 70 and over. Furthermore, by 20th March 2021 over 50% of the UK adult population had received the first vaccine dose.

3.18 The vaccine delivery continues at pace with the UK announcing on 13th April 2021 it had reached its target of offering a first dose to all over-50's and those in high-risk groups by 15th April, as well as being on track to offer a first dose to all adults by the end of July 2021.

3.19 Social distancing measures are anticipated to continue being loosened following the third lockdown and as the vaccinated proportion of the population increases. If that is the case, without any change in the efficacy of the vaccine or any other factors increasing cases, most current, direct social distancing impacts of Covid-19 would likely be over by the time of the proposed GM CAP opening in early 2022. However, there may still be long term behavioural changes and financial impacts resulting from the pandemic.

3.20 At the time of writing this report, the UK remains affected by the pandemic. Emerging evidence gathered over the course of 2020 and early 2021 has shown that there have been substantial changes to economy, travel patterns and behaviours. These changes have been driven by government policy and changes to people's choices as a result of the threat of Covid-19 in the short term, however some of the behaviours adopted during government lockdowns may continue once restrictions begin to ease.

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The health impacts of Covid-19

3.21 Work done to date to assess the relationship between Covid-19, air quality and the GM CAP in terms of health impacts has found that the effect of Covid-19 has been profoundly unequal:

- Among those diagnosed with Covid-19, older people, people from ethnic minorities and men have been more likely to die.[6]
- People living in deprived areas have been more likely to catch Covid-19 and more likely to die from it. The mortality rates from Covid-19 in the most deprived areas were more than double the least deprived areas.[7]
- Drivers of vehicles specifically affected by the Clean Air Zone (CAZ) are amongst the occupations recording most deaths involving Covid-19.[8]
- Taxi driving is the occupation with the greatest number of deaths in England & Wales.[9]
- Drivers of taxis, HGVs, vans and buses are all in the top 10 occupations in terms of total deaths from Covid-19 (out of 369 classifications).

3.22 A number of studies have suggested a link between air quality and risk of death from Covid-19, including an ONS study published in summer 2020 which found that long term exposure to poor air quality (specifically $PM_{2.5}$) could increase the risk of death from Covid-19.[10]

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[6] Disparities in the risks and outcomes of Covid, PHE (2020) https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/908434/Disparities_in_the_risk_and_outcomes_of_COVID_August_2020_update.pdf

[7] Disparities in the risks and outcomes of Covid, PHE (2020) https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/908434/Disparities_in_the_risk_and_outcomes_of_COVID_August_2020_update.pdf

[8] Deaths involving Coronavirus (COVID-19) by occupation (those aged 20 to 64 years), England and Wales: deaths registered between 9th March and 28th December 2020,ONS (2020) https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/causesofdeath/datasets/coronaviruscovid19relateddeathsbyoccupationenglandandwales

[9] Deaths involving Coronavirus (COVID-19) by occupation (those aged 20 to 64 years), England and Wales: deaths registered between 9th March and 28th December 2020, ONS (2020) https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/causesofdeath/datasets/coronaviruscovid19relateddeathsbyoccupationenglandandwales

[10] Does exposure to air pollution increase the risk of dying from the coronavirus (COVID-19)?, ONS (2020) https://www.ons.gov.uk/economy/environmentalaccounts/articles/doesexposuretoairpollutionincreasetheriskofdyingfromthecoronaviruscovid19/2020-08-13

3.23 There is emerging evidence of the prevalence of 'Long Covid', with around one in ten respondents to ONS surveys who had tested positive for Covid-19 displaying symptoms for 12 weeks or longer. There is also some evidence from experimental ONS statistics of the possible nature and prevalence of complications that may be related to Covid-19. Patients in hospital with Covid-19 experienced elevated rates of metabolic, cardiovascular, kidney and liver disease compared with patients of similar demographic and clinical profiles over the same period, especially diabetes and cardiovascular disease. It is possible that Covid-19 may leave a proportion of the population with medium or long-term health conditions that make them more vulnerable to the impacts of air quality[11].

3.24 There are undoubtedly impacts deriving from the Covid-19 pandemic which will affect the GM CAP programme and this report seeks to provide a summary of the known Covid-19 impacts on the scheme and present available evidence to forecast the likely impacts of the pandemic whilst the situation is still ongoing.

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[11] Prevalence of ongoing symptoms following coronavirus (COVID-19) infection in the UK, ONS (2021) https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/conditionsanddiseases/bulletins/prevalenceofongoingsymptomsfollowingcoronaviruscovid19infectionintheuk/1april2021

4 Assessing the potential impacts of Covid-19 on the GM CAP

4.1 The pandemic has had widespread impacts on individuals and businesses, varying in scale, leading to a change in the GM CAP base assumptions which were formed pre-Covid-19 in terms of the age of the vehicle fleet, travel behaviour and traffic levels, public transport provision and use, and the circumstances of businesses and the economy. The direct and indirect impact of the pandemic has led to changes in household savings and expenditure which have had a subsequent impact on vehicle purchasing and ownership patterns. Government restrictions have led to changes in traffic volumes, speeds and congestion and bus service patterns and bus fleet profiles. The following chapters will review the known existing and forecast impact of Covid-19 on the GM CAP, focussing on the factors considered most likely to impact the GM CAP.

4.2 To gather evidence on the impacts of Covid-19, work has included:

- Review of programme risk, sources and assumptions;
- Liaising with other CAP authorities such as Birmingham, Bath and Sheffield to share expertise;
- Scenario planning and brainstorming exercise;
- Monitoring of real-world conditions;
- Developing impact assessments by vehicle type and distributional impacts;
- Sensitivity testing of transport, air quality and economic models; and
- Research and consultation.

4.3 Businesses, taxi drivers, operators and organisations responding to the consultation were asked specific questions about the impact of Covid-19 on them and their business and their perception of the wider impacts on GM.

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4.4 In addition to the above, the GM CAP programme has been in regular liaison with JAQU's technical team to agree methodology, seek guidance and inputs and share early results emerging from consideration of the impact of the pandemic across 2020. JAQU supplied written guidance to inform local authorities how to consider Covid-19 impacts, what sensitivity testing they would like local authorities to carry out and how to consider Covid-19 within economic appraisal and distributional impact assessments. This has been reflected within the ten GM local authorities' work programme. JAQU has approved the ten GM local authorities' methodology to assess Covid-19 impacts and reflect those impacts within the modelling and analysis process.

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5 Factors likely to influence the GM CAP

5.1 The Covid-19 global pandemic has introduced uncertainty into the GM CAP project. GM carried out an exercise to better understand what changes could arise from the pandemic and the extent to which they could impact the GM CAP. This involved:

- A brainstorming exercise of the ways the Covid-19 pandemic could affect a wide range of factors including travel patterns, behavioural choices, vehicle fleets, public transport provision, businesses and the economy in the short, medium and longer term. This brainstorming exercise involved experts from the GM CAP consultancy team and TfGM's Strategy and Policy team, and was discussed with the local authority Steering Group[12] and JAQU's technical team to gain their input;

- A review of the evidence and assumptions underpinning the GM CAP, to establish which factors could be affected by the pandemic, where possible change had been identified in the brainstorming exercise; and

- Resulting in a shortlist of factors that both could change within the lifetime of the GM CAP and could be influential on the GM CAP.

5.2 The ten GM local authorities devised a series of sensitivity tests to test how impactful plausible changes could be. This testing took into account JAQU guidance on Covid-19 related sensitivity testing.

5.3 Where factors were identified within the sensitivity testing as potentially impactful, evidence has been gathered to assess to what extent these changes are materialising, where it is possible to do so. This evidence is set out in the remaining chapters, and the Conclusion considers in the round the extent to which changes that are resulting from the pandemic could affect air quality, and the performance and socio-economic impacts of a CAZ.

5.4 Further sensitivity testing will be carried out in summer 2021, considering how Covid-19 related uncertainty could affect the GM CAP as proposed post-consultation.

Introduction to the GM CAP modelling process

5.5 The purpose of the modelling process is to quantify the impact of traffic by vehicle type on emissions and consequently on concentrations of NO_2 at the roadside in GM.

[12] Throughout the development of the plan GM has considered a range of options to deliver compliance, overseen by the GM Steering Group. Members include Directors or Assistant Directors from each GM authority.

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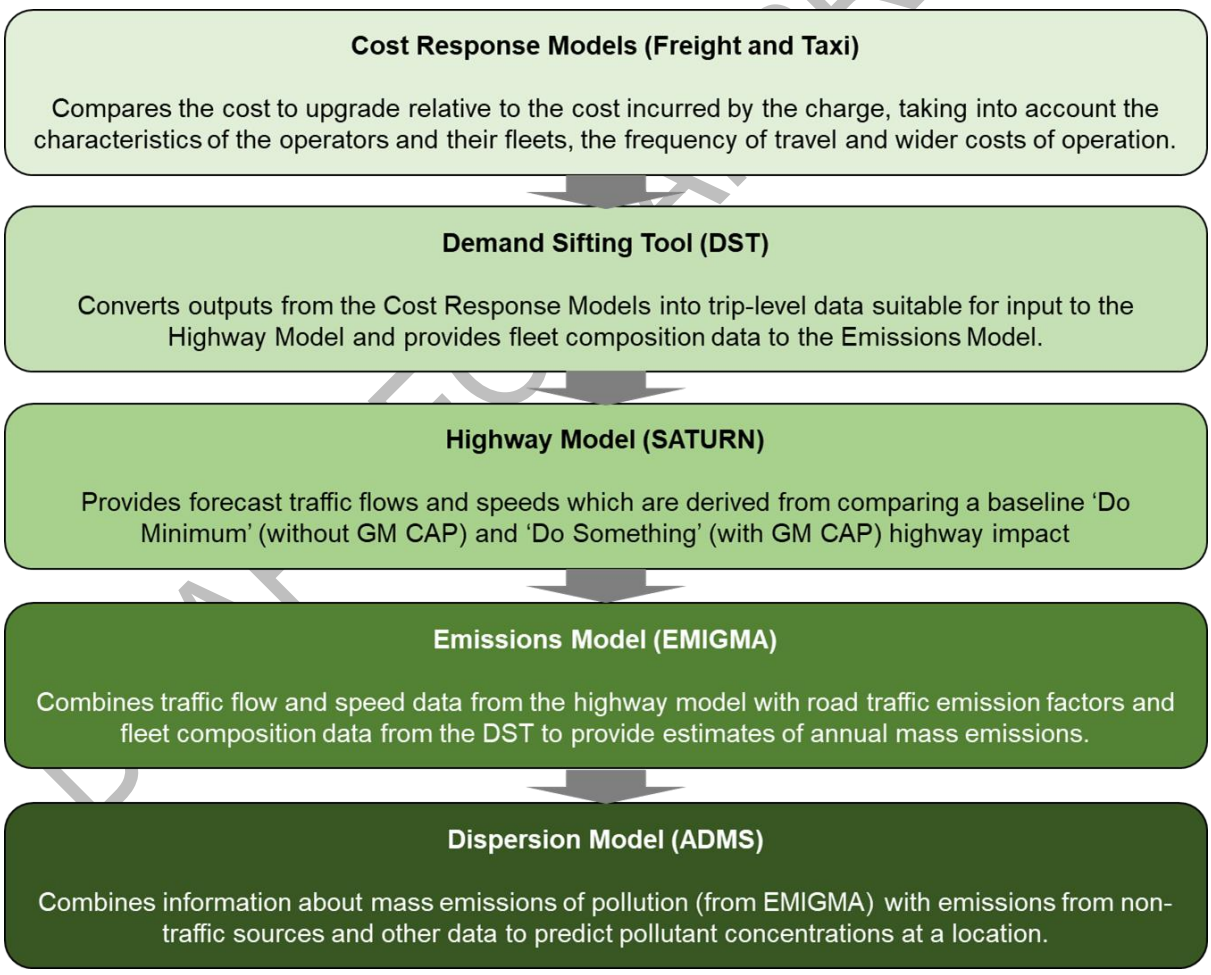
5.6 The modelling process provides a forecast of NO_2 concentrations in the baseline, if no action is taken, and then allows the ten GM local authorities to test the impact of different policies and proposals on vehicle fleets, traffic and emissions. Using these modelling tools, the ten GM local authorities forecasts NO_x emissions and NO_2 concentrations under a range of scenarios for the years 2021, 2023 and 2025. NO_2 concentrations for interim years and beyond 2025 are interpolated from the results in modelled years.

5.7 A brief summary of the modelling input steps feeding into the appraisal is presented in **Figure 5.1**, which shows each of the modelling components and their linkages within the modelling suite. For a full description of the modelling methodology, please see the Technical Reports T1-4 and AQ1-3 (Option for Consultation).[13]

Figure 5.1 Overview of the Modelling Process



[13] Clean Air Plan – Technical Documents, GM CAP (2020) https://cleanairgm.com/technical-documents/

5.8 Sensitivity testing can explore the impact of changes to assumptions – such as the age of the vehicle fleet, or behavioural responses to the proposed scheme - on the outputs at any phase of the modelling process.

Factors that could affect the GM CAP

5.9 The following factors were identified as both plausible outcomes of the pandemic and potentially impactful on the GM CAP:

- Vehicle upgrades are slow, with fewer new vehicles entering the fleet and older vehicles remaining in the fleet for longer;
- A sustained increase in working from home reduces commute traffic, particularly in peak periods;
- Bus mileage may reduce if patronage does not recover to pre-pandemic levels, unless subsidies are maintained to prevent this;
- Businesses may be less able to upgrade in response to the GM CAP, due to having exhausted their reserves, taken on debt, suffered shutdowns and so on; and/or
- Availability of compliant vehicles may be constrained, and/or prices may rise.

5.10 The following sections consider each of these issues, setting out the results of sensitivity testing and evidence gathered on changes over the past year. The structure of the remainder of the report is as follows:

- **Chapter 6** summarises the impact of Covid-19 on travel patterns to date, covering public and private transport, and looking at differences by vehicle type, place and time of day, as well as how the picture has changed through the pandemic;
- **Chapter 7** sets out the impact of the pandemic on vehicle purchases and therefore the age of the on-road vehicle fleet;
- **Chapter 8** sets out the evidence to date on working from home patterns during the pandemic and the results of sensitivity testing on the potential impacts of increased working from home on the GM CAP;
- **Chapter 9** sets out analysis showing the potential impact of reduced bus mileage on the GM CAP and the evidence with regards to the current position;

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- **Chapter 10** sets out the impacts of the pandemic on businesses and the economy, and considers whether vehicle owners may be less able to upgrade their vehicles in response to the GM CAP;

- **Chapter 11** considers the impact of the pandemic on the availability and cost of compliant vehicles; and

- Finally, **Chapter 12** summarises analysis that has been undertaken to understand the impacts of Covid-19 by vehicle type, and to assess how vulnerable each vehicle type is to the impacts of the GM CAP.

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6 Impact of Covid-19 on travel patterns

6.1 Data supplied by TfGM, Automatic Traffic Count (ATC) data and Highways England data has been assessed to evidence the pandemic's impact on travel behaviour in GM.

Overall travel demand

6.2 The impact of Covid-19 on travel demand in GM is shown below in **Figure 6.1.**

6.3 There was an initial substantial reduction in travel demand through March and April 2020 in response to the first national lockdown. This was seen across all modes of travel.

6.4 As the UK began to emerge from the first lockdown, travel demand began to increase through the summer months with travel and social distancing measures gradually easing, though did not return to pre-pandemic levels, noting that GM remained under greater restrictions than some other parts of the UK throughout this period.

6.5 At the start of September 2020, when some of the lowest levels of restrictions were in place, travel demand continued to increase (noting that GM was placed under stricter lockdown measures than much of the rest of the UK at this time). Following September 2020, further restrictions were re-introduced to control further Covid-19 outbreaks, resulting in the third national lockdown in January 2021.

6.6 Despite the introduction of the third lockdown in January 2021, traffic demand across GM was consistently higher than experienced during the first lockdown albeit traffic levels did not reached the levels witnessed across August 2020 – September 2020.

6.7 Taking a more detailed look at the impact of Covid-19 on transport modes in GM, **Figure 6.2** displays data from pre-lockdown (March 2020) to March 2021.

6.8 This shows that travel by active modes was close to pre-pandemic levels by March 2021 (70% for walking and over 90% for cycling). Highway travel was at around 90% of pre-pandemic levels while travel by public transport was still much lower than normal.

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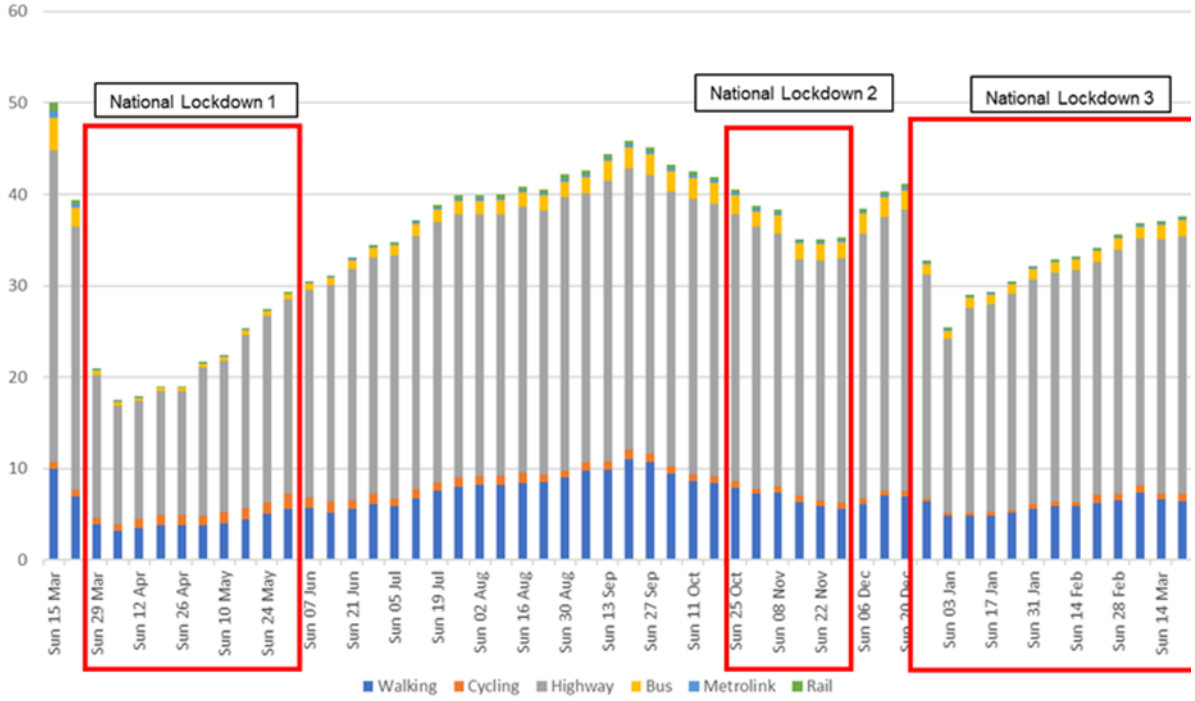
6.9 Bus demand has recovered more (50%) than other public transport modes (30% for Metrolink and Rail) reflecting the wider range of destinations served and use by those without access to a car however demand remains suppressed as only 'essential' workers were encouraged to travel on public transport during all three national lockdowns, and at the time of writing that guidance has not yet been lifted after the third lockdown.

Figure 6.1 Average Weekly Flow in GM, All Modes (March 2020–March 2021)



Source: TfGM Monitoring

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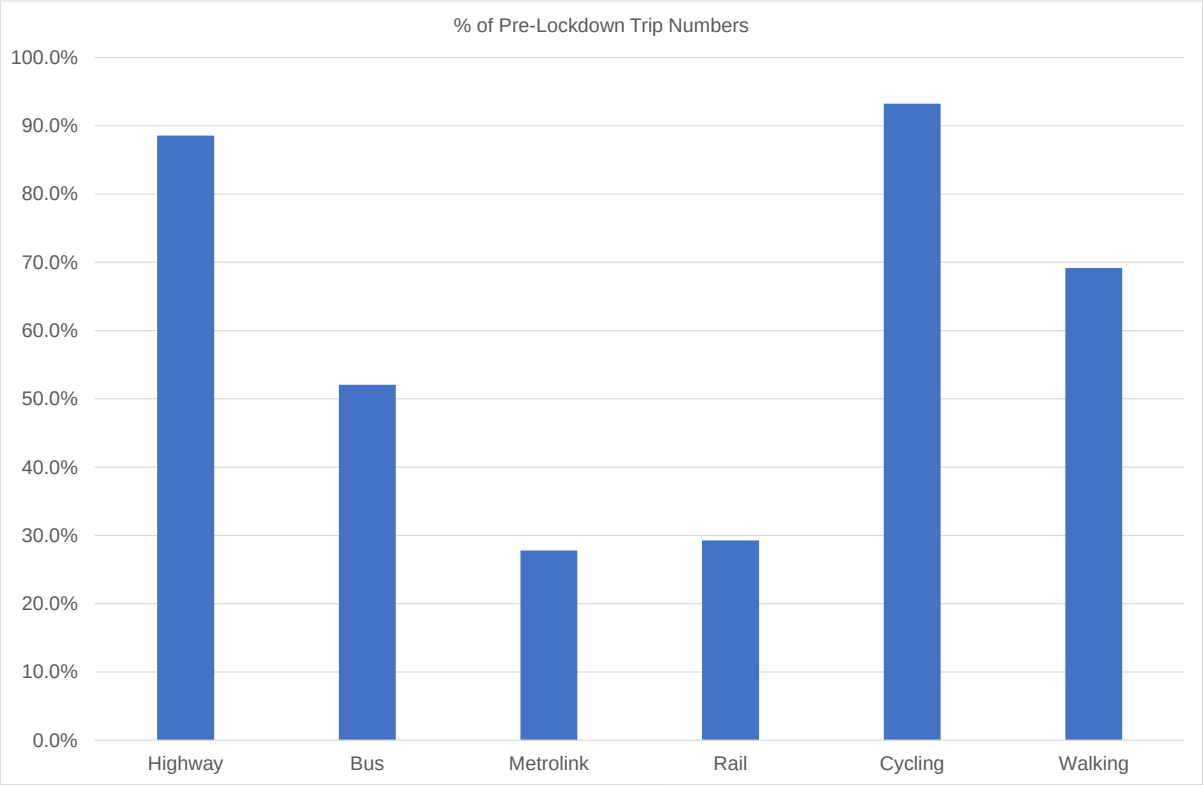
Figure 6.2 Trips in March 2021 by mode as a proportion of trips in March 2020 (pre-lockdown)



Source: TfGM Monitoring

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Traffic patterns: Introduction

6.10 ATC data has been used to compare the first 2 weeks in March 2020, (just prior to the introduction of the first social distancing rules on the 16th March), and the most recent data from March 2021 when restrictions were still in place.

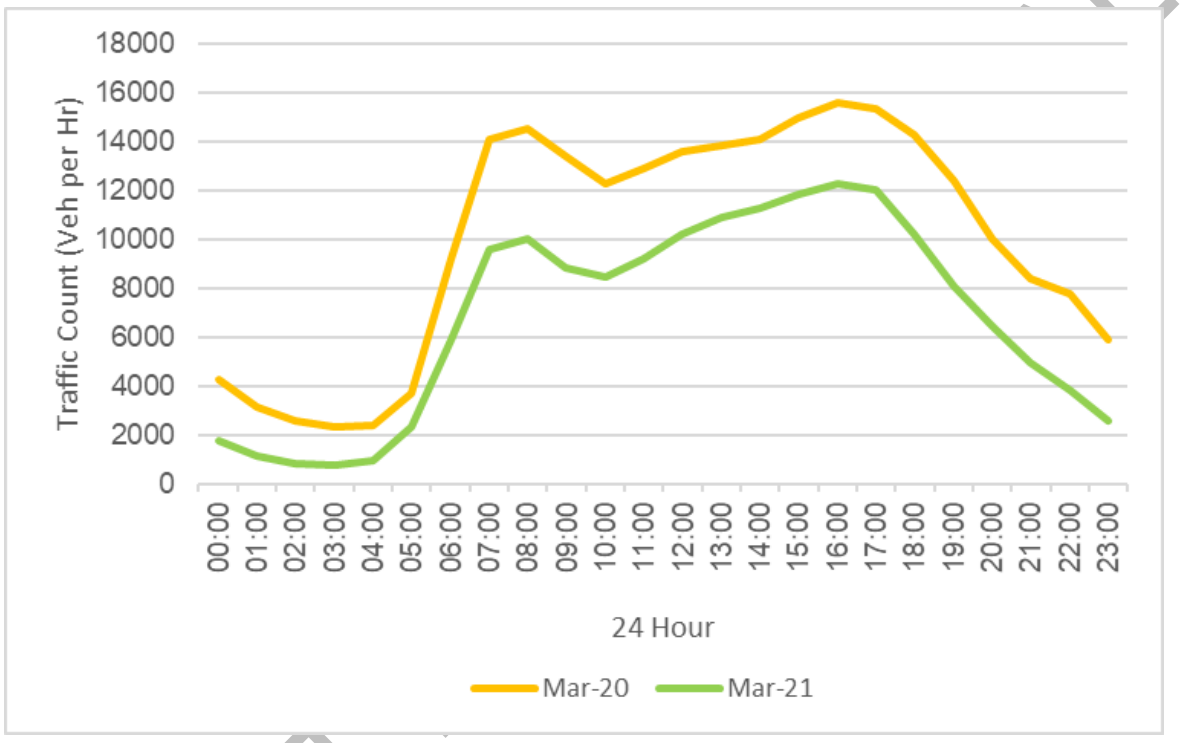
6.11 The ATC data has been reviewed by time of day (am, pm and inter-peak periods) and by type of location to understand key trends in changing traffic flows.

6.12 The findings show that over the entire course of the day, vehicle volumes in March 2021 were generally lower than in March 2020 (prior to the lockdown) however this fluctuated on different parts of the GM road network. Certain areas of the road network have been collated to produce a representative total vehicle volume. A breakdown of the findings are provided below by location and vehicle type.

Traffic patterns: Regional centre

6.13 March 2021 traffic volumes remained below those of March 2020, with a 32% average reduction throughout the day. Traffic flows were nearest to 2020 values during the interpeak with a reduction of 25%, however numbers remained consistently lower than 2020 throughout the Inter Peak and the PM Peak, with considerable decline through the night-time period.

Figure 6:3 Traffic Count - GM March Comparison: Regional Centre



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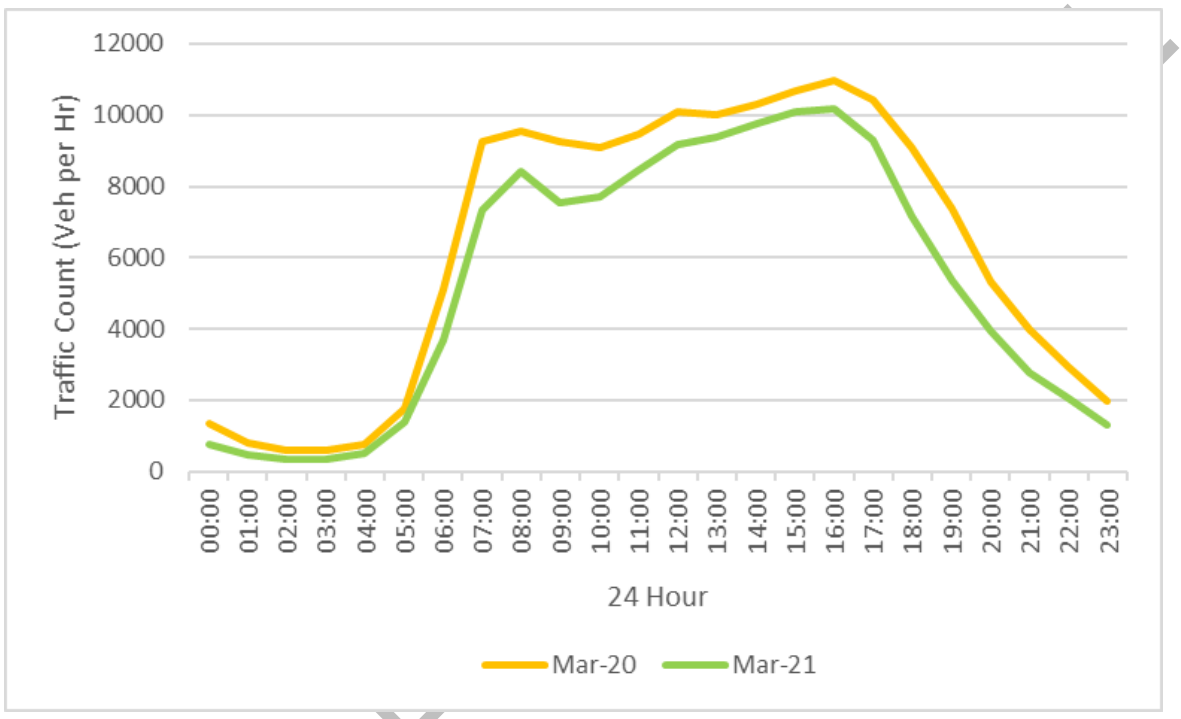
Traffic patterns: Local centres

6.14 March 2021 total traffic flows at sites close to Local Centres remained relatively close to March 2020 volumes, with a total average 24-hour reduction of 15%. The AM Peak had a 17% reduction in traffic in March 2021 and from the end of the AM peak into the interpeak it was slower to recover than the rest of the day.

Figure 6:4 Traffic Count - GM March Comparison: Local Centres



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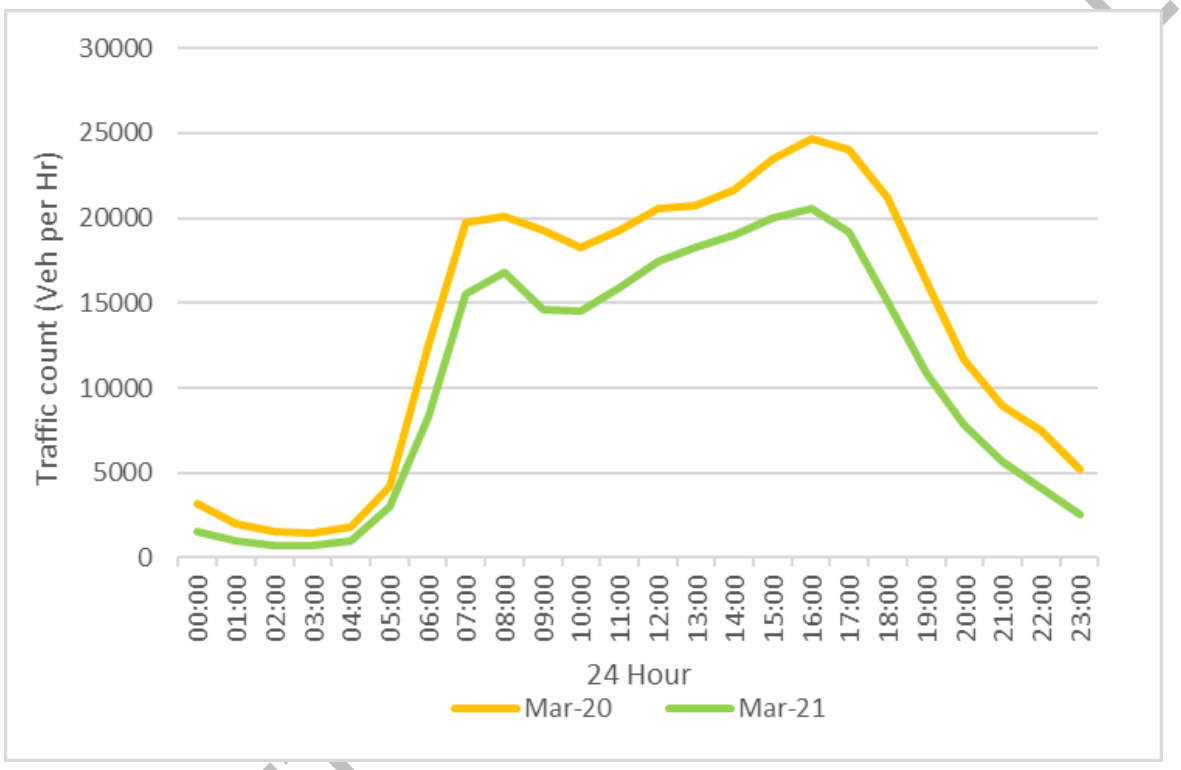
Traffic patterns: Radial routes

6.15 Traffic flows throughout the day on key radial corridors in March 2021 were overall 23% below those in March 2020. The March 2021 inter peak period has recovered quicker than other times of the day with a 15% traffic flow decline compared to March 2020, in contrast to the AM peak which saw a 21% reduction. This can be explained by the decline in commuter traffic and the increase in working from home.

Figure 6:5 Traffic Count - GM March Comparison: Radial Routes



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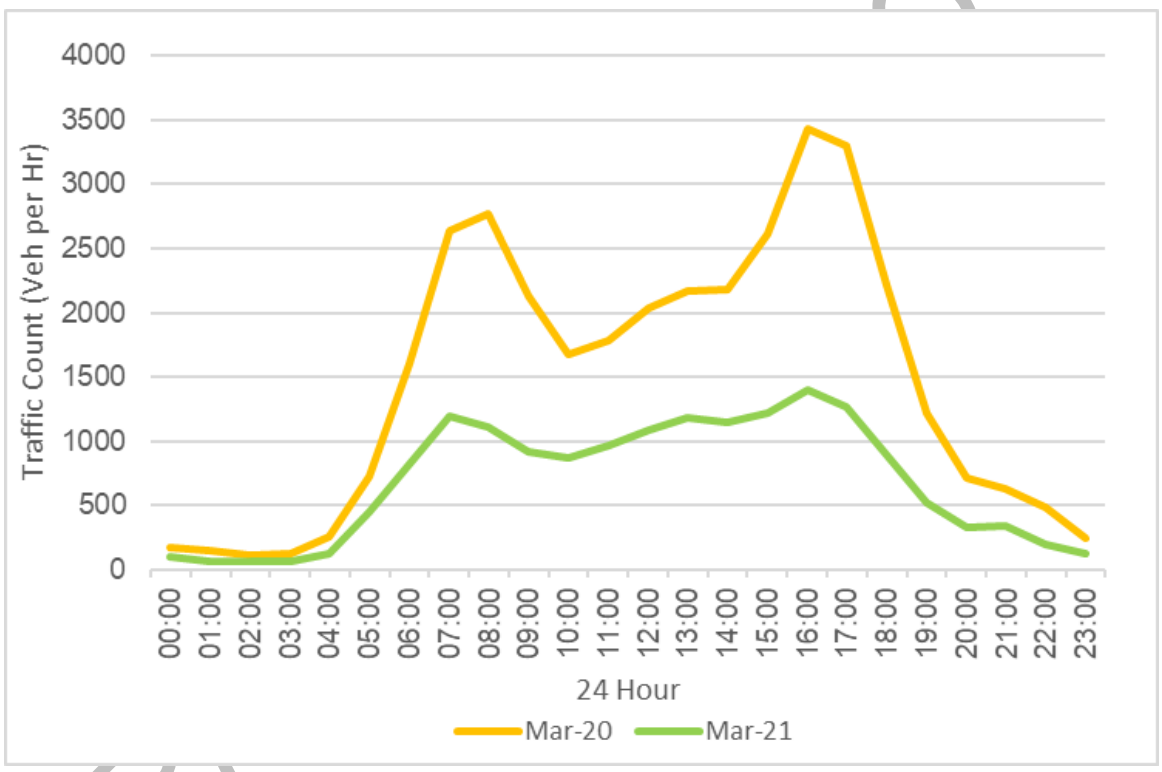
Traffic patterns: Employment sites such as Trafford Park

6.16 These areas saw the largest proportional decrease in traffic volumes between March 2020 and March 2021, with an overall fall of 54%. The AM and PM Peaks suffered the biggest reduction, with a 57% decrease in AM volumes and a 59% decrease in PM volumes. These considerable declines in commuter traffic in and around these employment sites are very likely to be the result of restrictions, for example the closure of non-essential shops reducing the number of visitors to shopping centres, and where it was possible workers moved to working from home[14].

Figure 6:6 Traffic Count - GM March Comparison: Employment Sites

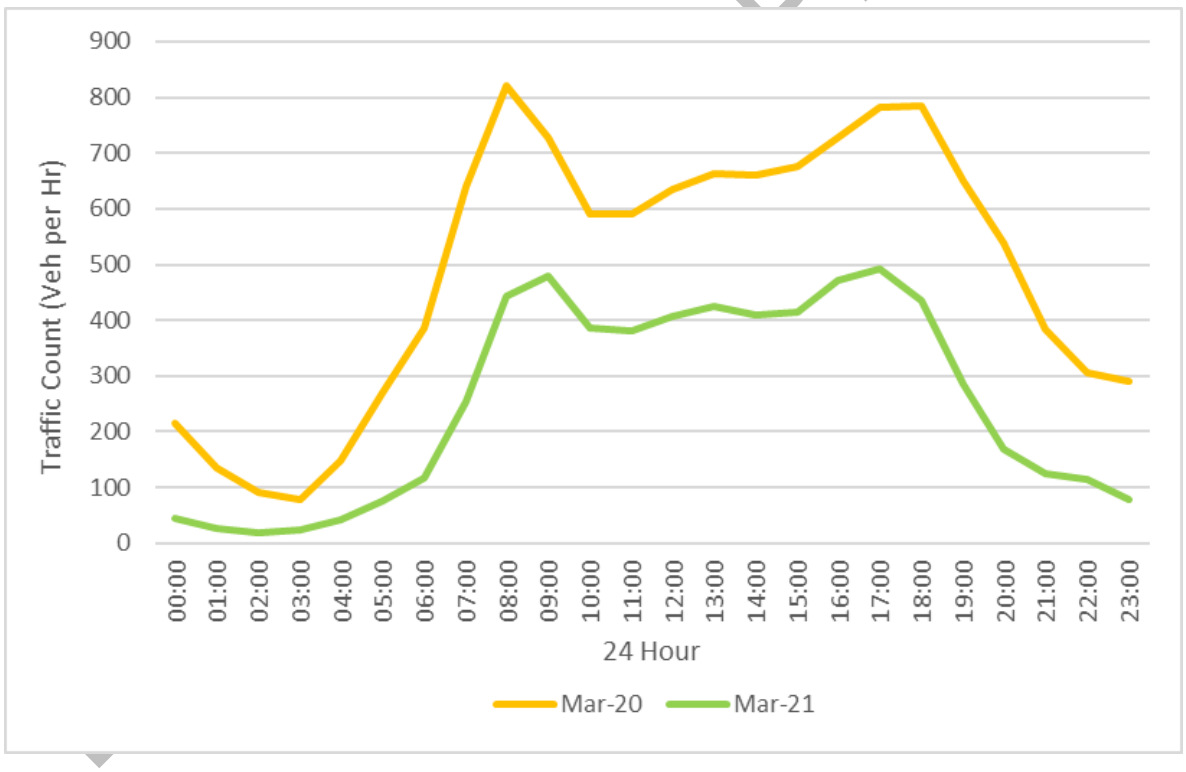


[14] It is important to note that ATC data for March 2021 was not recorded at one of the employment sites, which contributed to the large reduction in traffic volume in 2021

Traffic patterns: Manchester Airport

6.17 The pandemic has had a severe impact on Manchester Airport. Total traffic volumes, taken from the M56 Junction 5, around Manchester Airport, have seen a reduction of 48% between March 2020 and March 2021. Immediately after the March 2020 data was recorded the Airport closed 2 of its 3 terminals due to passenger numbers steeply declining because of the pandemic. The most resilient time period is the Inter-Peak with a reduction of 36%, compared to the AM and PM Peaks which have suffered a significant reduction in traffic volumes. Furthermore, in March 2021 non-essential travel was forbidden due to the national lockdown, including travelling abroad. DfT's Transport Statistics show that pre-pandemic, 28.7% of passengers travelled to the airport by taxi and therefore the reduction in air travel has had a particularly strong impact on the demand for taxi travel and therefore on the taxi trade.

Figure 6:7 Traffic Count - GM March Comparison: Manchester Airport



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Strategic highway network demand

6.18 The ATC count data has been supplemented by Highways England Strategic Road Network (SRN) data from the online database WebTRIS.

6.19 The SRN data highlighted that cross-GM boundary traffic flows in March 2021 were close to reaching pre-pandemic levels witnessed in March 2020 indicating that private car and freight traffic has recovered. Whilst future trajectory is unknown, traffic levels on the road network may exceed pre-pandemic levels if public transport usage remains low.

6.20 This trend was also seen on the M60. Most sections along the M60 motorway in March 2021 were close to traffic levels seen in March 2020 with Junctions 13-14 exceeding levels experienced in 2020. The exceedance levels at Junction 13 and 14 on the M60 in March 2021 could be the result of strategic journeys converging on the SRN from the M62, M602, M61 and A580, recognising that Covid-19 has had a material impact on commuter traffic.

6.21 The marginal difference on the SRN is reflective of the limited trip impact on HGV and LGV activity after the initial lockdown period with some sectors such as food and pharmaceuticals operating at higher than expected levels, masking other freight movements which have reduced due to the pandemic such as those associated with the hotel, restaurant and entertainment sectors.

LGV traffic

6.22 There was a significant decrease in flows between March and April 2020 following the introduction of the first lockdown. By May 2020, considering the seven-day moving average of daily counts, LGV observations were 59% of what they were at the start of March 2020.

6.23 From June 2020 to August 2020 the seven-day moving average for LGVs had exceeded levels seen at the start of March and subsequent national lockdown restrictions have not been as stringent on the sectors relying on LGVs as the first lockdown period. The prevalence of home deliveries is likely to have been a significant factor here.

HGV traffic

6.24 HGV volumes saw a decline during the first lockdown with a gradual increase in volumes until September 2020, with flows exceeding pre-pandemic levels.

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6.25 Despite the decline in flows during the subsequent second and third lockdowns, the HGV volumes remained on average 90% above the equivalent months and were not as low in comparison to the first lockdown. Some HGV businesses were able to diversify their operations to reflect the changing demand however more specialist HGV business that have not been able to adapt have been impacted more.

Impact of Covid-19 on travel patterns: Conclusion

6.26 Travel demand varied during the year, reflecting the differing intensity of lockdown and travel restrictions. By March 2021, highway demand was close to pre-pandemic levels, whilst public transport demand remained considerably below pre-pandemic levels, particularly on Metrolink and rail, with active travel somewhere in the middle.

6.27 The most significant decreases in traffic are during the AM and PM peak periods.

6.28 Local centres across GM experienced the smallest reduction in traffic which could be associated with a greater proportion of commuters working from home or on furlough and making a higher proportion of local amenity trips. This is consistent with the higher reductions experienced in the Regional centre and at employment locations, reflecting the nature of employment patterns along with changing travel behaviours.

6.29 The most significant reduction in traffic volumes was witnessed at GM employment sites and Manchester Airport with approximately half of journeys ceasing during the pandemic compared to pre-pandemic levels, reflecting the reduction in commuting and business travel and constraints on international travel.

6.30 The pandemic's impact on travel by different vehicle modes has been unequal with freight (HGV and LGV) activity quickly returning to pre-pandemic levels by the middle of 2020 after the initial lockdown period whilst public transport has faced a sustained fall in patronage and it remains to be seen whether passenger numbers will recover to pre-pandemic levels and how quickly.

6.31 Ongoing uncertainty remains on the trajectory and composition of traffic volumes as the UK continues to emerge from lockdown. As the economy continues to open up, it remains to be seen whether behaviours adopted during the pandemic are embedded in the long-term. This is explored further in the following chapters.

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7 Impact of Covid-19 on vehicle upgrades and the age of the fleet

7.1 One possible outcome of the Covid-19 pandemic is that vehicle owners delay purchases of new vehicles, meaning that there are fewer new vehicles on the road and the oldest vehicles remain on the road for longer before being scrapped, leading to an older on-the-road fleet than previously assumed.

7.2 Sales of new cleaner vehicles lead to a natural turnover of on-road fleet, as the replaced vehicles pass onto the second-hand market, with the oldest most polluting vehicles gradually cycled out of the fleet. It is this effect which reduces overall road transport emissions as the fleet becomes cleaner leading to projected future improvements in NO_2, and it is this trend which the GM CAP seeks to accelerate by making older more polluting vehicles less financially attractive compared with cleaner models.

7.3 The ten GM local authorities has carried out sensitivity testing to assess the possible impact of an older-than-expected fleet on the GM CAP, set out below, and gathered evidence on the impact of the pandemic on vehicle sales.

Vehicle sales: Cars

7.4 The evidence shows that Covid-19 has led to a substantial reduction in new vehicle sales of cars in 2020, which has continued into 2021.

7.5 Evidence of reduced vehicle sales since March 2020 is available on a monthly basis[15], and projections of sales recovery have been published recently by the SMMT[16] for cars in 2021/22, along with patterns in the second hand used car market.

7.6 Further analysis of the pre-Covid sales patterns for private cars, shows that sales have been falling year-on-year since 2016 (**Figure 7.1**). It is therefore not considered reasonable that vehicles sales per year should be forecast to exceed those in the pre-Covid reference level. This means that it is unlikely that the lost sales will be 'caught up' during the lifetime of the GM CAP.

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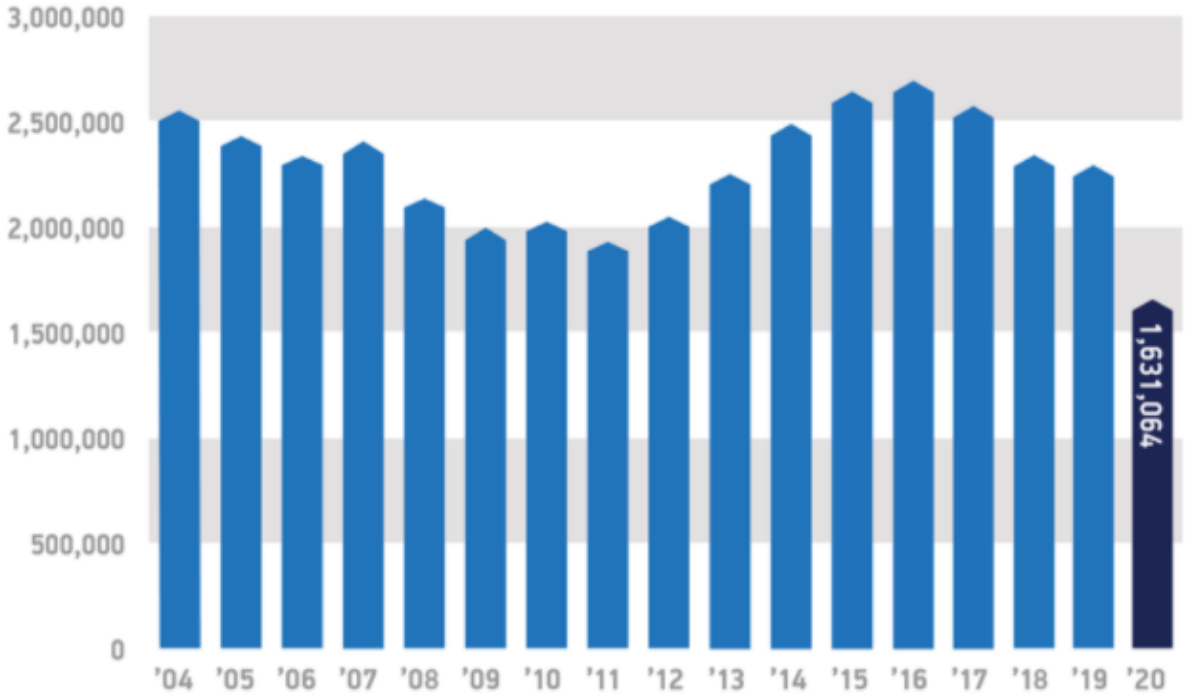
[15] Vehicle Data, SMMT (2021) https://www.smmt.co.uk/vehicle-data/
[16] UK New Car and LCV Registration Outlook to 2022, SMMT (2021) https://www.smmt.co.uk/wp-content/uploads/sites/2/WEBSUM-SMMT-CARLCV-MARKET-OUTLOOK-Q1-REVISED-03032021.pdf

Figure 7.1 Annual Car Registrations 2004-2020



Source: SMMT[17]

Vehicle sales: LGVs

7.7 There was a significant fall in new LGV registrations from March to June 2020 however registrations subsequently rebounded into 2021 with new registration levels now broadly following pre-pandemic trends.

7.8 Sales of vans have been stable since 2016, and were more resilient during the pandemic after the initial national lockdown. Furthermore, sales in January and February 2021 were greater than those recorded historically indicating strong market demand and that supply of new vehicles isn't unduly restricted at this stage (**Figure 7.2**). It is therefore considered reasonable that vehicles sales per year could be forecast to exceed those in the pre-Covid reference level. This means that over the duration of the GM CAP, the age of the LGV fleet is expected to get closer to the age of the fleet as forecast pre-pandemic, so the impact of the pandemic will decline over time.

Figure 7.2 Monthly Van Registrations 2017-2021

[17] Vehicle Data, SMMT (2021) https://www.smmt.co.uk/vehicle-data/

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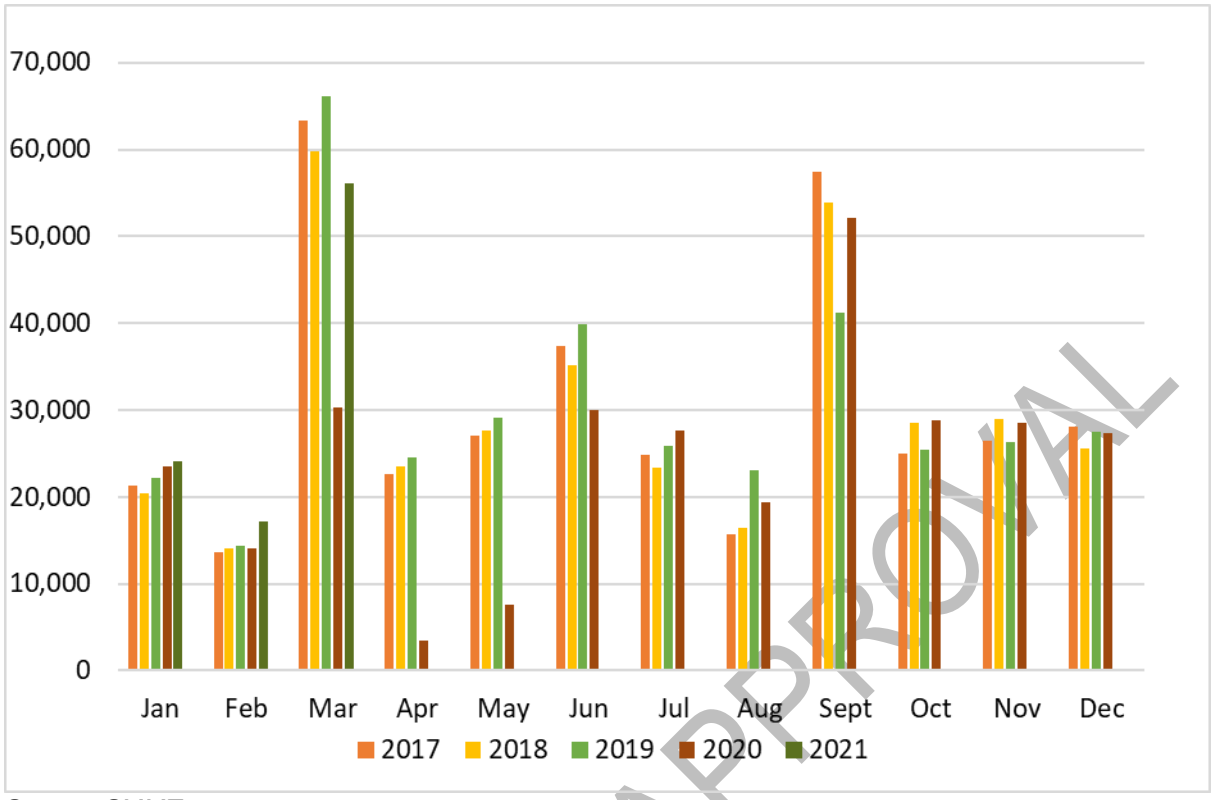

Source: SMMT[18]

Vehicle sales: HGVs

7.9 A review of HGV sales shows that whilst there has been a reduction in 2020, this was in part a consequence of increased atypical sales in 2019 due to regulatory changes coming the following year, as shown in **Figure 7.3**. This effect would have been expected to impact 2020 sales before the impacts of Covid 19.

7.10 Total 2019/20 sales, which account for a 2-year structural sales shift altering investment cycles, fall within 1% of pre-existing 2016-2018 trends.

Figure 7.3 Annual HGV Registrations 2015-2020

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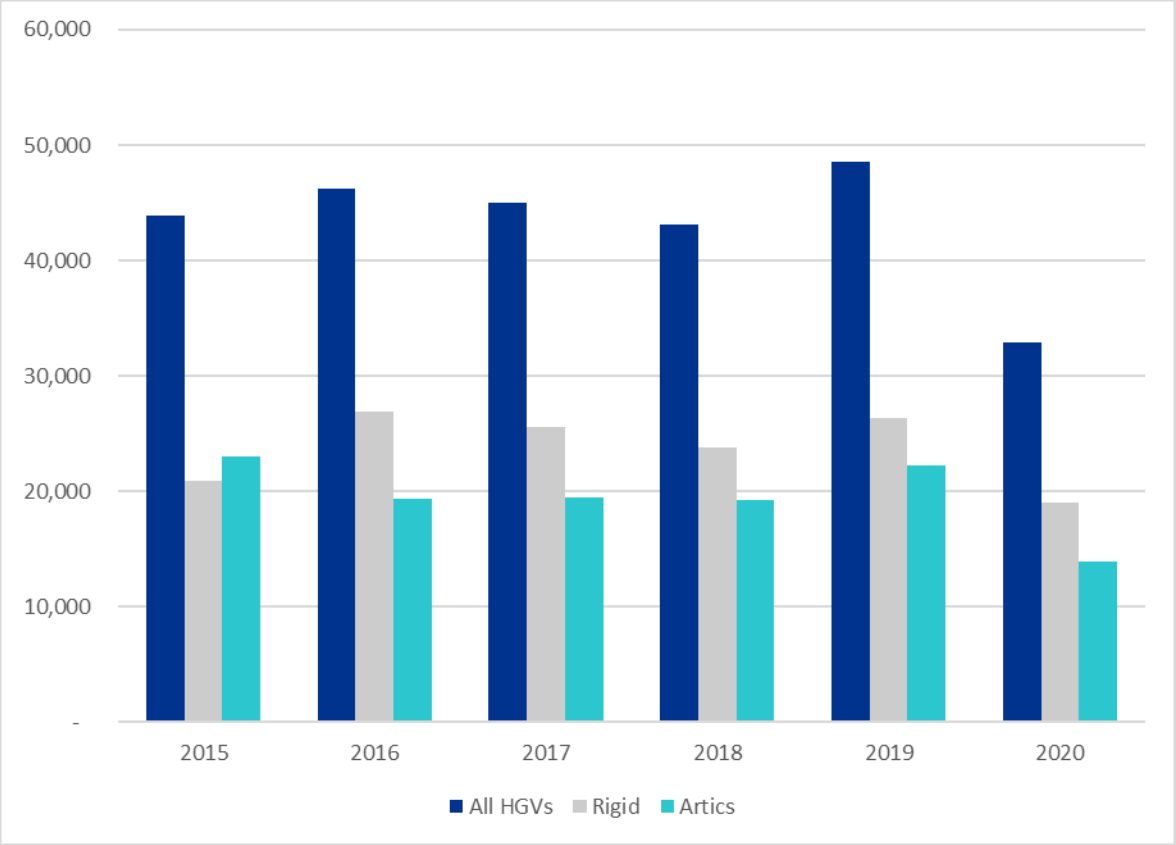
[18]LGV Registrations (2021) https://www.smmt.co.uk/vehicle-data/lcv-registrations/



Source: SMMT[19]

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Vehicle sales: Bus, Coach and Minibus

7.11 The UK new bus and coach market was already in decline, with the market falling by 19% in 2019. The start of 2020 offered growth in the market with bus and coach registrations up 16% in Q1 with 1,403 units joining UK roads. Minibus demand drove this overall increase, as registrations more than doubled. Although there are differences in registrations on the different bus and coach types (single-deck and double-deck), there has been a significant fall overall in new bus and coach registrations in Q4 2020 compared to the same period in 2019 (-35%).

Vehicle sales and licenses: Taxi

7.12 London Electric Vehicle Company (LEVC), one of the main producers of Hackney Carriages, wrote to its production partners in April 2020 to invoke a 'force majeure' clause in contracts due to their factory in Coventry closing on the 26th March 2020 reflecting the downturn in demand for taxis. The LEVC's factory reopened in June 2020 and has since been able to continue production. By quarter 3 2020, taxi manufacture in the UK was down 53% compared to the previous year.

[19] HGV Registrations (2021) https://www.smmt.co.uk/vehicle-data/heavy-goods-vehicle-registrations/

7.13 GM licensing data for Hackney Carriages and PHVs has been obtained for December 2020. These data show that only two compliant Hackney Carriages and 85 PHVs were registered since 23rd March 2020, representing a reduction against pre-Covid rates in new registrations of >95% and >85%, respectively.

Sensitivity testing – impact of an older fleet

7.14 A sensitivity test was carried out assessing the possible impact on the GM CAP if the vehicle fleet was one year older than previously assumed in the Do Minimum scenario (the situation without the GM CAP). This is an indicative scenario, and reflected JAQU guidance. This would mean that a greater proportion of vehicles would be in scope for CAZ charges, because the replacement of those vehicles has been delayed.

7.15 If the vehicle fleet was one year older at the time of introduction of the CAZ, this indicative modelling indicated that the number of points of exceedance in the Do Minimum scenario could increase from 69 in 2023 in the pre-pandemic scenario, to 102, with emissions increasing by more than 10%, as shown in **Table 7.1**.

Table 7.1 Delayed Fleet Upgrade - Modelled NOx Emission Totals by Area (All Vehicles, EMIGMA, Tonnes per Year)

Area	Year	% increase in emissions with a one year older fleet compared to the pre-Consultation position	
		Do Minimum	Do Something
GM	2023	+10.4%	+9.5%
	2025	+12.2%	+7.7%

7.16 This sensitivity testing indicates that the impacts of slowed fleet upgrade would likely lead to significant changes to NO_2 concentrations. The ten GM local authorities has therefore collated evidence to assess the extent to which the pandemic has led to delays in vehicle upgrades.

Impact of Covid-19 on vehicle upgrades and the age of the fleet: Conclusion

7.17 Covid-19 has led to a substantial reduction in new vehicle sales in 2020 for most vehicle types, which have continued into 2021 for cars and taxis. Commercial vehicle sales have proved more resilient in the latter stages of the pandemic.

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7.18 Sensitivity testing demonstrates that this delay in vehicle sales will lead to an increase in emissions and bring more vehicles in scope for the charge.

7.19 GM has set out its methodology for representing a delayed fleet upgrade within the modelling, summarised in the Post-Consultation Air Quality Modelling Report. This applies the assumptions set out in

7.20 **Table 7.2**. The modelling results are set out in that same report.

Table 7.2 Recommendations of Vehicle Fleet and Upgrade Rates: assumptions by vehicle type

Vehicle Type	Change Proposed	Justification
Bus	No	Fleet mix assumptions will not be altered. Bus operators already responding to CAZ in terms of upgrading their fleet (retrofit funds have been made available already) and so it is not considered likely that bus fleet will age more than expected. Electric bus routes will be incorporated when funding is secured or the fleets are already in operation.
HGV	No	Purchases were disrupted in 2019 and 2020 by factors other than Covid. Analysis suggests that overall purchases across the two years were fairly typical of an average year.
LGV	**Yes**	Purchases were depressed in 2020, with some recovery in early 2021. Analysis suggests that **a delay of c.3 months is plausible**, with the age of the fleet **gradually converging to close to the pre-Covid forecast by 2025** if sales recover over time.
Hackney Cab & PHV	**Yes**	Consider that significant impact likely – based on licensing data, propose applying **a delay of one year** to the upgrade of the Hackney & PHV fleet**, to be maintained throughout the lifetime of the GM CAP i.e. to 2025.**
Car	**Yes**	Although not in scope for a CAZ C, important contributor to background emissions. Evidence suggests a significant delay in fleet upgrade and that this is likely to be maintained in future years. **Delay of c7 months proposed, to be maintained throughout the lifetime of the GM CAP i.e. to 2025**.
Coach and Minibus	No	No changes to the transport and air quality modelling are applicable, because not directly represented in these tools.

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8 Impact of Covid-19 on working from home

8.1 Throughout the pandemic, workers have been encouraged to work from home if possible, and many more people have done so than before. It is possible that the experience of home working during the pandemic will lead to a permanent change in working patterns for some, where individuals and businesses have found it to be productive, efficient and appealing.

8.2 A permanent increase in working from home could lead to reductions in traffic during peak periods, due to reduced commuting. It is worth noting that it is possible that it is also possible that people spending more time at home may increase their travel by car for other purposes during the day, and there is some evidence that this has happened during the pandemic, where we have seen declines in traffic around high density employment locations, but lesser declines around local centres, as set out in Chapter 7.

8.3 The ten GM local authorities has carried out sensitivity testing to assess the possible impact of increased working from home on the GM CAP, set out below, and gathered evidence on the possible scale of working from home.

Working from home during the pandemic

8.4 Data released by the Office for National Statistics in May 2020 showed that the Covid-19 pandemic has had a significant impact on the way in which people work, especially during the initial lockdown period, with approximately 48% of employees working remotely during the period 23rd March to 5th April as a result of social distancing measures introduced by the UK government.[20]

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[20] Technology intensity and homeworking in the UK, ONS 01/05/20

8.5 The amount of home working varied throughout the year. By May 2021, businesses reported that around 30.5% of their workforce was working remotely. The information and communications sector and professional, scientific and technical activities sector had the highest proportion of staff working from home, at 81% and 68% respectively, whilst only 7.5% of workers in the accommodation and food services sector were working from home. [21]

8.6 In comparison, prior to the pandemic only about 5% of the working population mainly worked from home, with 12% of employees working from home at some point in the week. Over 70% of employees never worked from home (based on surveys undertaken by the ONS during the period January to December 2019).[22] Overall, 27% of businesses said that they had had more staff working from home as a result of the pandemic.[23]

8.7 The potential for home working varies significantly by employment sector. For industries such as transport, accommodation and food services, for example, only about 10% of workers have ever worked from home prior to the pandemic, with only about 2% of workers in these industries 'mainly working' from home. In contrast, almost 15% of people working in information and communication services mainly worked from home pre-pandemic, with almost a third of the people employed in these sectors having worked from home in the week prior to interview (in 2019) and more than half having worked from home at some time[24].

Working from home post-pandemic

8.8 Although there has been a gradual increase in the proportion of people who work from home in recent years it is difficult to judge whether people's experience of home working during the lockdown period could help to stimulate demand for flexible/remote working in future years. Research carried out prior to the pandemic suggests that people are happiest with a working pattern of 2-3 days at home, spending the remaining time in the workplace.[25]

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[21] https://www.ons.gov.uk/businessindustryandtrade/business/businessservices/bulletins/businessinsightsandimpactontheukeconomy/latest
[22] Coronavirus and homeworking in the UK labour market: 2019, ONS
[23] Wave 20, Business insights and impact on the UK economy, ONS https://www.ons.gov.uk/economy/economicoutputandproductivity/output/datasets/businessinsightsandimpactontheukeconomy
[24] Coronavirus and homeworking in the UK labour market: 2019, ONS, https://www.ons.gov.uk/employmentandlabourmarket/peopleinwork/employmentandemployeetypes/articles/coronavirusandhomeworkingintheuklabourmarket/2019
[25] https://www.dpgplc.co.uk/attitudes-towards-homeworking/

8.9 Coupled with this, business attitudes to employees working from home are likely to have adapted since the pandemic as large proportions of staff within non-essential travel sectors continue to work from home. However, this is not likely to be universal: in surveys carried out by the ONS in December 2020, just 16% of businesses said they were intending to use increased home working as a permanent business model going forwards, with 67% not planning to do so and 17% not sure. Bigger businesses were more likely to be considering retaining increased home working, with improved staff wellbeing and decreased overheads the main reasons for doing so. [26]

8.10 Given the uncertainty around forecast levels of home working, a simple approach has been adopted for sensitivity testing, which involved applying percentage reductions to commuting car trips in future years. High and low growth reductions were applied, equivalent to cuts in commuting car trips of 20% and 10% respectively compared to the car trips assumed in each model year prior to the pandemic. These values are considered to be plausible, based on analysis of prior working from home patterns and the distribution of the workforce in terms of sectors where working from home is more or less possible, and could provide suitable ranges for interpolation to be used to estimate impacts for alternative scenarios.

Sensitivity testing – increased working from home

8.11 GM tested two scenarios for increased working from home: a 10% reduction in commuting car trips and a 20% reduction in commuting car trips. These were considered to be plausible in light of the level of change that has happened during the pandemic.

8.12 The impacts of increased working from home on all-purpose car trips are illustrated below in **Table 8.1**. The table shows the most significant changes occurring in the peak hours which is associated with the core commuting activity. A 10% reduction in commuting car travel would result in 5% reduction in all-purpose car flows in the AM peak hour and a 4% reduction in the PM peak hour. Inter-peak car flows would fall by approximately 1%. A 20% reduction in commuting car trips would effectively double the reduction witnessed within the AM and PM peaks.

Table 8.1 Increased Working from Home – impact on total car trips

Proposed Test	AM Peak Hour	Inter-Peak Hour	PM Peak Hour
10% Reduction in Commuting Car Trips	-5%	-1%	-4%

[26] Wave 20, Business insights and impact on the UK economy, ONS https://www.ons.gov.uk/economy/economicoutputandproductivity/output/datasets/businessinsightsandimpactontheukeconomy

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20% Reduction in Commuting Car Trips	-10%	-3%	-8%

8.13 Whilst these changes are not insignificant, they need to be viewed in the context of overall road traffic emissions, and that whist car flows represent approximately 74% of the annual traffic flow in GM in 2021, they only account for 42% of total NOx emissions from road transport. This is because other vehicle types such as HGVs and buses have much higher emission rates than private cars, and therefore have a disproportionate impact on air quality levels relative to their overall contribution to the total traffic flow.

8.14 The results of the modelled changes in mass NOx emission totals from the air quality (EMIGMA) modelling relative to the 2023 GM CAP (Do Something) scenario are shown in **Table 8.2**. These results indicate that a 10% reduction in commuting car flows would produce a reduction in mass NOx emissions from private cars of approximately 2% across GM as-a-whole, with a 1% reduction in total traffic emissions (from all vehicle types) in both forecast years. A 20% reduction in commuting car flows would produce a reduction in mass NOx emissions of close to 5% across GM, with a 3% reduction in total traffic emissions (from all vehicle types) in both forecast years.

Table 8.2 Increased Working from Home – impact on NO_X emissions

Area	Year	10% Reduction in Commute Car trips		20% Reduction in Commute Car Trips	
		Car	All Vehicles	Car	All Vehicles
GM	2023	-2.3%	-1.4%	-4.6%	-2.7%
	2025	-2.3%	-1.3%	-4.6%	-2.7%

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8.15 The air quality results of the test with the 20% commute reduction scenario show that one additional exceedance site is brought into compliance in 2023, leaving two remaining exceedance sites in the Consultation Option. The exceedance site which is modelled to be brought into compliance is the A58 Bury, where private cars represent 47% of total NOx emissions which is higher than the average proportion across GM. The impacts of the test at the two last points of exceedance in the regional centre are negligible. The sites are dominated by bus emissions, and therefore the impacts of reduced commute traffic does not alter the predicted 2023 modelled concentrations.

8.16 In summary, the evidence suggests that credible increases in working from home would have a fairly limited impact on air quality and on the GM CAP.

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Impact of Covid-19 on working from home: Conclusion

8.17 More people have worked at home during the pandemic than ever before and there is evidence that a minority of businesses are planning to sustain this to some extent. However, future working from home practices will vary by sector and not all people or businesses will be able to work remotely.

8.18 Modelling has shown that credible reductions in commuters translate into marginal benefits in terms of the number of locations in exceedance of NO_2 limits. Any such change would not be sufficient to negate the need for the GM CAZ.

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9 Impact of Covid-19 on bus mileage

9.1 Covid-19 has had a significant impact on bus operations with public funding required to maintain services whilst constraints have been applied on bus use through social distancing and public messaging to "avoid public transport".

9.2 There is a great deal of uncertainty regarding the longer-term impacts of Covid-19 on travel demand, which are likely to vary by mode. As a direct result of the Covid-19 pandemic, there is a risk that the level of bus services will contract either through a loss of services entirely or reduced service frequency. This could be realised in a number of ways including:

- Reduction in demand in peak periods due to sustained behavioural changes such as more working from home;
- Reduction in demand due to sustained changes in shopping / leisure patterns;
- Reduction in travel by bus as a recessionary impact; and/or
- Increase in the car mode share due to restrictions on public transport use, or people being deterred from public transport by fear of infection/concerns about hygiene.

Bus services and patronage during Covid-19 pandemic

9.3 At the start of the first lockdown, bus mileage fell substantially with Stagecoach reporting that they ran only 40% of normal mileage in April 2020.[27] Passenger volumes fell by 90% at the start of lockdown.

9.4 However, bus services recovered quickly as Government support was provided. The funding has been supplied by Government to enable bus operators to continue operating services despite constraints on capacity due to social distancing rules and depressed passenger demand. The Covid-19 Bus Service Support Grant (CBSSG) paid GM operators £3.5m per month between March and June 2020, followed by a restart package of £254m launched in June 2020. By November 2020, bus mileage was at 95% of normal levels.

[27] Note CV14 – Covid 19 Impacts on Bus

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9.5 Patronage has been slower to recover, with bus trips remaining at just over half of their normal level in March 2021, with a greater recovery seen in early autumn before further lockdowns were implemented. Analysis in autumn 2020 found that patronage had reduced in the morning peak and between 4-5pm but increased in off-peak periods, reflecting the different travel patterns brought about by the pandemic.

9.6 It remains to be seen what will happen to patronage when all restrictions are lifted. It is understood that future bus funding from central government CBSSG is to be set with the intention of maintaining existing levels of service provision.

Sensitivity testing – decreased bus mileage

9.7 Given the uncertainty around the impacts of Covid-19 on buses, a simple approach has been adopted for sensitivity testing, testing the impacts of a 10% reduction in bus mileage across the whole of GM in 2023 and 2025. No account has been taken within this test for any possible associated increase in car travel, and therefore the reduction in bus services acts to reduce emissions, by removing buses from the roads. In practice, we would expect some bus trips to be replaced by car trips so the emissions reduction may be less than forecast here.

9.8 **Table 9.1** below outlines the emissions reductions associated with a 10% reduction in bus flows. The results show that a 10% reduction in bus mileage would result in an equivalent reduction in bus emissions in both the Do-Minimum and Do-Something scenarios, in 2023 and 2025, a total reduction of just under 1% of emissions.

9.9 Compared to the Do Minimum scenario, a 10% reduction in bus mileage would result in a reduction of eight exceedances in 2023 (from 69 to 61) and two in 2025 (reducing from 12 to 10).

9.10 With the GM CAP Consultation Option and reduced bus mileage, exceedances in 2023 would reduce by one from three to two. GM is fully compliant by 2025 with the GM CAP.

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Table 9.1 Reduction in Bus Mileage - impact on NO_X emissions

Area	Year	Do-Minimum		Do-Something	
		% Change		% Change	
		Bus	All Vehicles	Bus	All Vehicles
GM	2023	10%	0.8%	10%	0.2%
	2025	10%	0.7%	10%	0.3%

Impact of Covid-19 on bus mileage: Conclusion

9.11 After an initial reduction in bus services in the very early part of the pandemic, bus mileage has been maintained close to full operation due to Covid-19 sector support offered by the UK Government.

9.12 It is understood that future bus funding from central government CBSSG is to be set with the intention of maintaining existing levels of service provision. Whilst there are typically minor variations in routes and service frequencies over time, an overall trend of mileage reduction should therefore not be anticipated or represented within the GM CAP.

9.13 Whilst marginal benefits have been shown by a reduction in buses operating across GM's exceedance locations, it is unknown whether a reduction in bus demand would lead to an increase in private car journeys thus offsetting any air quality benefits.

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10 Impact of Covid-19 on businesses and the economy in GM

10.1 There is significant uncertainty about the impact of Covid-19 on the national and GM economies through 2021 and beyond, due to domestic and international conditions. There are uncertainties over the vaccination rate, efficacy, and transmission reduction effectiveness of vaccines, alongside the possible impact of current or future virus mutations. This is both in terms of impacts directly on the UK and the indirect impacts as a result of worldwide economic conditions. Alongside this is the impact of the UK leaving the EU, which remains uncertain. To provide a forward look at the environment that the GM CAP will be operating within, national and local economic data has been collated which evidences the potential impacts Covid-19 has had on the economy.

10.2 This chapter then considers the potential impact of those economic changes on the GM CAP, in terms of whether vehicle owners may be less able to upgrade their vehicles in response to the GM CAP, for example because they have exhausted their savings or reserves, taken on more debt or suffered periods of shutdown.

10.3 This builds on the analysis in Chapter 7, which considered the risk that vehicle owners have delayed business-as-usual upgrades as a result of the pandemic, and therefore that the vehicle fleet will be older in light of the pandemic and more people will find themselves in scope for the CAZ. The changes set out in Chapter 7 affect the 'Do minimum' fleet, in other words, the vehicles on the road when the GM CAP is introduced, so the impact of the pandemic on the decision to upgrade under normal circumstances without the CAZ. This Chapter considers the impact of the pandemic on the decision to upgrade as a result of the CAZ.

Economic Position - National

10.4 As a result of the Covid-19 pandemic, the UK economy has suffered the deepest recession since records began, with a fall in GDP of 20.4% in Quarter 2 (April - June) of 2020 following a 2.2% fall in Quarter 1. Despite a record level of growth of 16.1% during Quarter 3 (July-September 2020) following the easing of lockdown restrictions, over the year 2020 saw a 9.9% decline in GDP, the largest annual fall in UK GDP on record.

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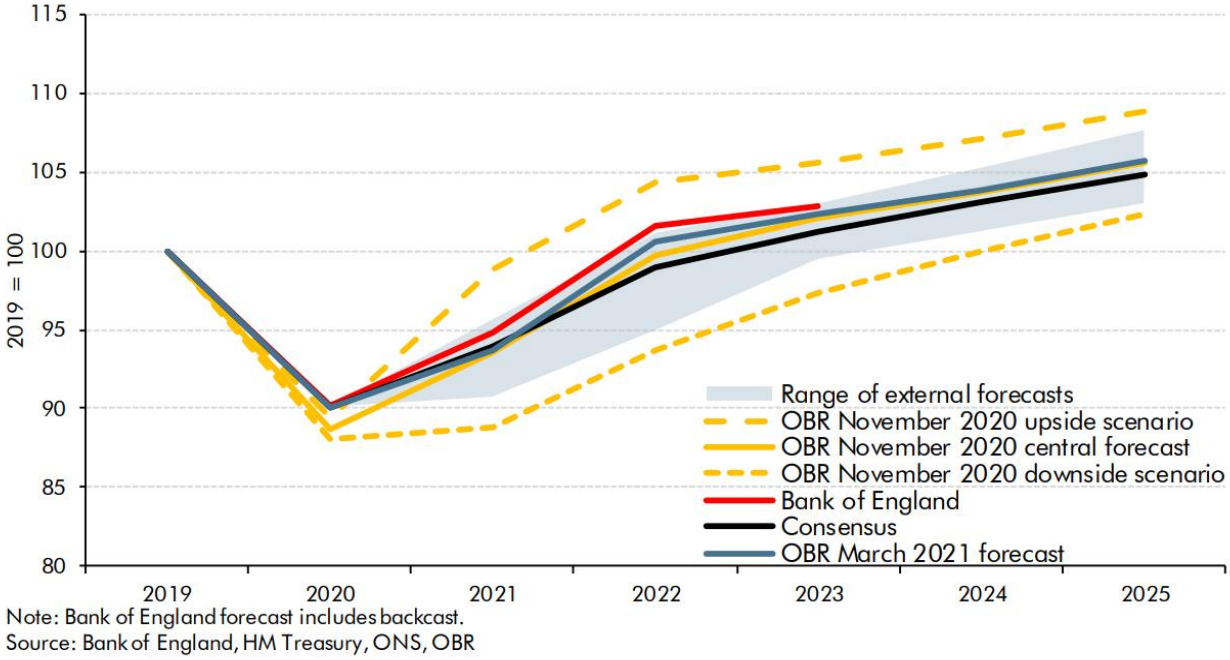
10.5 Financial support has been provided by the UK Government to businesses during the pandemic through various initiatives including the Coronavirus Job Retention Scheme (CJRS), Self-employed Income Support Scheme (SEISS), VAT cuts for hospitality and targeted sector support. However, the funding provided has only partially mitigated the full economic impact to certain sectors.

10.6 **Figure 10.1** provides the March 2021 OBR forecast for GDP growth per annum, alongside the Bank of England forecasts and a wider 'consensus' forecast. The consensus amongst the forecasts is that after a low point in 2020, there will be a steady progression upwards in 2021 towards real GDP growth.

Figure 10.1 GDP Growth Forecasts Including Bank of England and Other Entity Forecasts



Source: Office for National Statistics and Office for Budget Responsibility[28]

[28] https://obr.uk/efo/economic-and-fiscal-outlook-march-2021/

10.7 The extent of the long-term unemployment and broader economic impact of Covid-19 is discussed within the March 2021 OBR Economic and fiscal outlook report.[29] **Figure 10.2** below illustrates unemployment projections forecast by the OBR in November 2020 and compares these with the latest forecast from March 2021. The report found that a faster recovery in output, additional fiscal support from the government and the extended CJRS limited the rise in unemployment, with current unemployment levels lower than the central forecast from November 2020.

10.8 Unemployment is forecast to peak in 2022 at 6.5%-7%. For context, this compares to a peak of 11.7% in 1984, a peak of 10.4% in 1993 and a most recent peak of 8.1% in 2011. This suggests there is not anticipated to be as extreme unemployment as other recent recessions, however, there will be a large budget correction following the cost of Covid-19, which will likely impact Government spending and tax rates. It is also worth noting that the way unemployment is defined and counted has changed over the past four decades so unemployment rates at different periods are not directly comparable.

10.9 The unemployment rate by the end of 2021 is predicted to be 6.5% (2.2 million); 340,000 lower and 6 months later than what was forecast in November 2020. This pattern reflects the restrictions on industry sectors e.g. transport and accommodation, and businesses using less labour in sectors such as retail and hospitality. It also reflects the long-term impact of having time away from employment experienced by some CJRS beneficiaries. There remains a wide uncertainty in the potential long-term economic outcomes, reflected in the fact that the upside and downside scenarios produced in the OBR's November 2020 report have not been updated.

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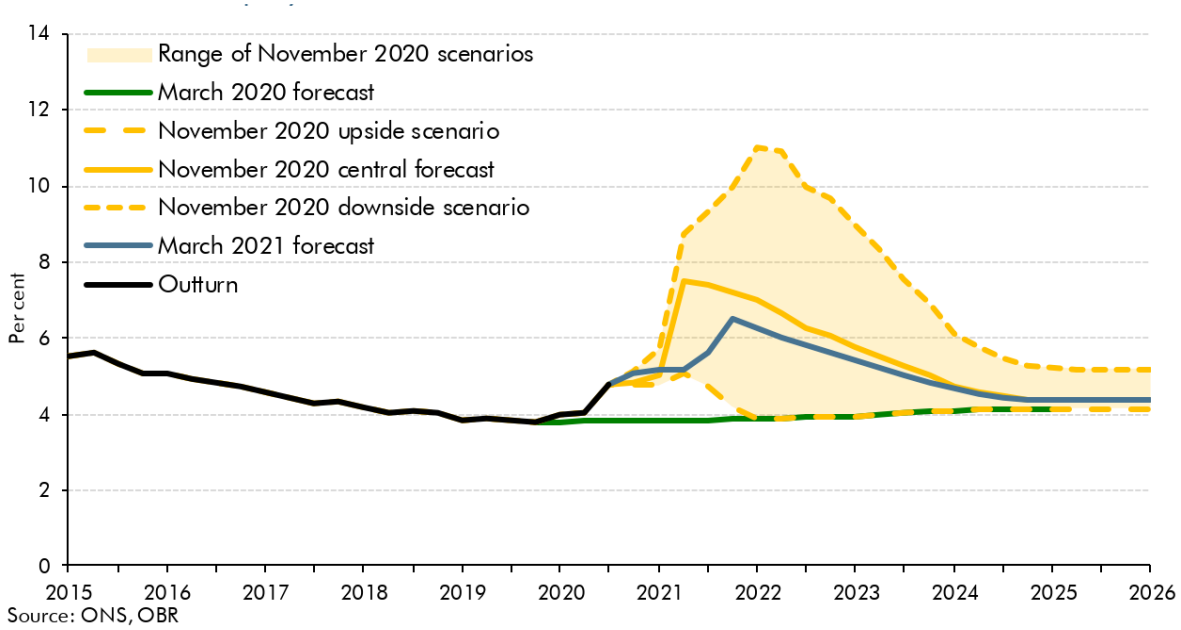
[29] Economic and fiscal outlook ONS OBR – March 2021 (2021) https://obr.uk/efo/economic-and-fiscal-outlook-march-2021/

Figure 10.2 Unemployment Rate Forecast, OBR March 2021



Source: Office for National Statistics and Office for Budget Responsibility[30]

10.10 In terms of redundancy rates, these have exceeded the highest rate during the 2008 and 2009 financial crisis.

10.11 **Figure 10.3** portrays the trend in the redundancy rates. The redundancy rate is the ratio of the redundancy level for the given quarter to the number of employees in the previous quarter, multiplied by 1,000.

10.12 Between April 2020 and July 2020, an additional 88,000 people in the UK were made redundant compared to the same period in 2019.[31] The rate continued to increase between August and October 2020 with the number of people reporting redundancy increasing to a record high of 370,000, with the peak in September 2020.[32]

10.13 Since September 2020 the numbers have gradually decreased, but in the latest figures released by the ONS the redundancy rate was still at a higher level in January 2021 than before the pandemic in March 2020.

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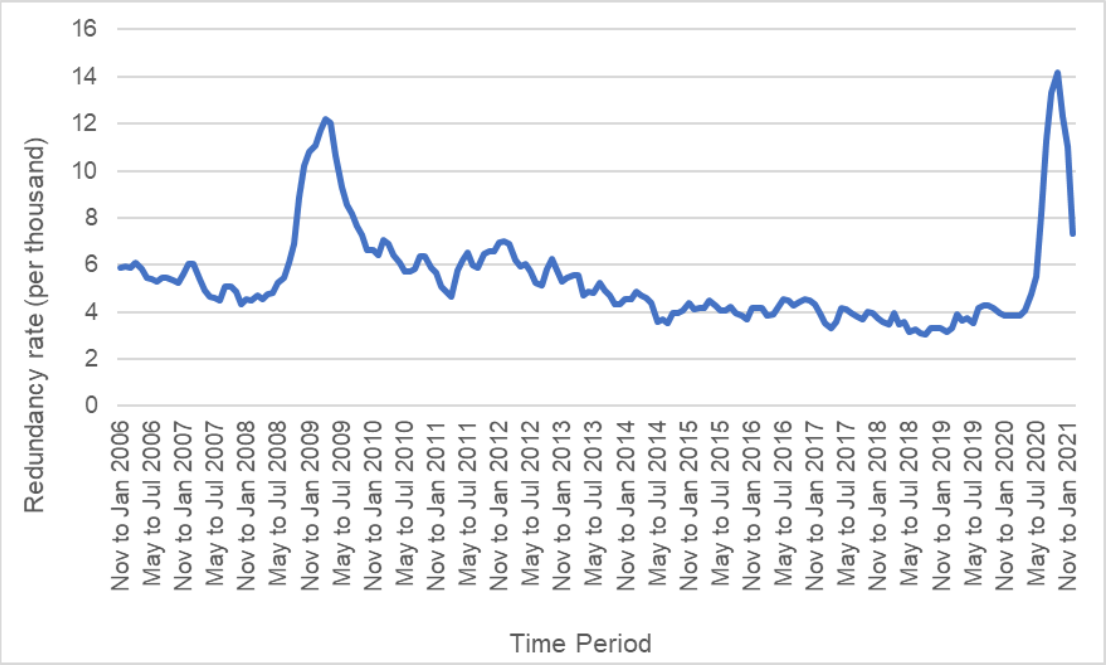
[30] https://obr.uk/efo/economic-and-fiscal-outlook-march-2021/

[31] Labour market overview, UK: September 2020, ONS (2020) https://www.ons.gov.uk/employmentandlabourmarket/peopleinwork/employmentandemployeetypes/bulletins/uklabourmarket/september2020

[32] Labour Market overview, UK: December 2020, ONS (2020) https://www.ons.gov.uk/employmentandlabourmarket/peopleinwork/employmentandemployeetypes/bulletins/uklabourmarket/december2020

Figure 10.3 Redundancy Rates in the UK (Nov 2006-Jan 2021)



Source: ONS – Labour Force Survey – March 2021[33]

10.14 **Table 10.1** shows measures of business impact, based on the Government's Business Insights and Conditions Survey. This shows that many businesses have experienced periods of closures, and that between 25 and 30% of businesses at any given time are reporting that they have very low cash reserves and are paying more in debt repayments than normal.

Table 10.1 Measures of Covid-19 business impact [34]

	Jun 2020	Sep 2020	Dec 2020	Mar 2021
Proportion of businesses currently trading	65.9%	86.3%	70.6%	75.1%
Proportion of businesses with less than 3 months of cash reserves	27.7%	25.5%	32.1%	30.7%
Proportion of businesses saying debt repayments are higher than expected for the time of year	-	-	25.3%	31.2%

[33] https://www.ons.gov.uk/employmentandlabourmarket/peopleinwork/employmentandemployeetypes/bulletins/uklabourmarket/march2021

[34] Based on Waves 7, 14, 21, 27 (and wave 20 for Dec 2020 for debt repayments) of the ONS Business Insights and Conditions Survey https://www.ons.gov.uk/surveys/informationforbusinesses/businesssurveys/businessimpactofcoronaviruscovid19survey

Source: ONS – Business Insights and Conditions Survey[35]

Economic Position – GM

10.15 **Table 10.2** shows the various impacts during 2020 to March 2021 from GM's economic resilience dashboard, which is updated monthly by the Greater Manchester Combined Authority.

Table 10.2 GM's Economic Resilience Dashboard - March 2021

Economic Impacts	March 2021 Release[36]
% of claimant count	**84% increase to 137,890** (Mar '20 – Mar '21)
Consumer confidence points	**-16** (fallen 9 points since February 2020)
% of GM businesses reporting reduced revenues	**55%** (Feb '21-Mar '21)
Number of GM employees on furlough	**182,200** (end of Feb '21)
Number of self-employed income support scheme ph2 applications in GM	**84,000** (end of Jan '21)
% of businesses making redundancies and % planning to	**10% and 4.8%** (Feb '21 - Mar '21)

Source: GMCA[37]

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[35] https://www.ons.gov.uk/surveys/informationforbusinesses/businesssurveys/businessimpactofcoronaviruscovid19survey

[36] Economic Dashboard, GMCA (2021) https://www.gmtableau.nhs.uk/t/GMCA/views/GMEconomicResilienceDashboard/Analysis/jack.james@greatermanchester-ca.gov.uk/4f3be3e5-759e-47ee-85f9-6c1538fc265c?%3Adisplay_count=n&%3AshowVizHome=n&%3Aorigin=viz_share_link&%3AisGuestRedirectFromVizportal=y&%3Aembed=y

[37] Economic Dashboard, GMCA (2021) https://www.gmtableau.nhs.uk/t/GMCA/views/GMEconomicResilienceDashboard/About/jack.james@greatermanchester-ca.gov.uk/b7906092-2ef4-46a2-837e-6c00e7ef6284?:display_count=n&:showVizHome=n&:origin=viz_share_link&:isGuestRedirectFromVizportal=y&:embed=y?iframeSizedToWindow=true&:embed=y&:showAppBanner=false&:display_count=no&:showVizHome=no&:origin=viz_share_link.

10.16 The Greater Manchester Chamber of Commerce's Quarterly Economic Survey (QES) also provides a good indicator of the local economic climate. In the March 2021 release of the QES, a 3 - 4% decline of GDP in Quarter 1 2021 is forecast. GM businesses have experienced reduced sales because of the pandemic and reported that they were less resilient than they were pre-pandemic as reflected in the Greater Manchester Index, a composite indicator which is based on selected QES measures that reflect the overall performance of the GM economy e.g. domestic sales and orders, international sales and orders, confidence in turnover and profitability and capacity utilisation™.

10.17 Many GM residents have been furloughed through the Coronavirus Job Retention Scheme and the number claiming unemployment benefits more than doubled since the start of the pandemic. At the same time, there have been fewer job opportunities overall in GM.

10.18 However, there is some optimism following the vaccination programme, the easing of the third lockdown with the 'Steps' roadmap and continuation of business support from the government. This optimism has increased business confidence, recruitment plans and customer demand, resulting in the Greater Manchester Index™ moving to positive for the first time since April 2020, increasing from -20.7 in Quarter 4 2020 to 6.1 in March 2021. However, there are variances between the industry sectors regarding recovery. The survey also found internationally active businesses are experiencing challenges with EU partners regarding trade following Britain leaving the EU.[38]

Sensitivity testing – impact of a lower upgrade response

10.19 If vehicle owners are in a worse financial position as a result of the pandemic, this could result in them being less able to upgrade their vehicle in response to the GM CAP. In particular:

- Vehicle owners may have reduced or exhausted their reserves/savings during the pandemic;
- Vehicle owners may have become more indebted, by accessing Government or other loans, overdrafts and credit options;
- Vehicle owners may not have been able to trade as normal during 2020 and therefore may find it more difficult to demonstrate that they are credit-worthy;

[38] Quarterly Economic Update Q1 2021, GM Chamber of Commerce (2021)– https://www.gmchamber.co.uk/media/3849109/qes-q1-2021-v2.pdf

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- Turnover and profitability may be reduced due to any economic downturn arising from the pandemic, reducing the ability to save or borrow; and/or

- Normal business-as-usual upgrades may have been delayed, increasing the loan-to-value ratio for those upgrading (because they are financing more vehicles at any one time).

10.20 The ten GM local authorities has carried out three tests to better understand the impact of a lower upgrade response (ie: fewer vehicle owners upgrading their vehicles in response to the GM CAP) see **Table 10.3**. These are:

- A 10% increase in the proportion of vehicle owners choosing to 'stay and pay';

- A 20% increase in the proportion of vehicle owners choosing to 'stay and pay'; and

- A test representing the impact of lower affordability by increasing the purchase prices and decreasing the residual value of existing vehicles, to create a greater 'affordability gap'.

10.21 Overall, as would be expected, the tests demonstrate that if more vehicle owners choose to stay and pay, emissions will rise. A 20% increase in the proportion choosing to 'stay and pay' compared to the Consultation Option leads to a 4% increase in total NOx emissions across GM. However, the tests of a 10% and 20% increase in the proportion of vehicle owners choosing to 'stay and pay' would involve vehicle owners choosing not to do when is economically sensible for them to do, based on the evidence the ten GM local authorities has available.

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Table 10.3 Changes to behavioural responses, 2023 – impact on NOx emissions

Scenario	Car	LGV	HGV	Taxi	Bus	Total
10% increase in stay and pay	0.0%	2.8%	11.9%	2.0%	0.0%	1.8%
20% increase in stay and pay	0.0%	6.3%	23.3%	4.2%	0.0%	3.9%
Reduced affordability[39]	0.0%	2.3%	3.3%	0.7%	0.0%	1.0%

10.22 The ten GM local authorities created the 'reduced affordability' test as a way of understanding the impact of plausible and measurable changes in factors affecting behavioural responses. Full dispersion modelling was carried out for this test, as the least unrealistic option. In total, the test representing reduced affordability led to an increase in the number of sites that could be non-compliant in 2023 with the GM CAP of two, from three to five. If the increase in the proportion of vehicles choosing to stay and pay was higher than this, as per theother two tests for example, the impact on exceedances would be expected to be greater, but this is considered less likely.

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[39] LGVs and Hackneys: +10% in vehicle purchase cost and -10% in vehicle sell price. HGVs and PHVs: +20% in vehicle purchase cost and -20% in vehicle sell price

Impact of Covid-19 on business and the economy: Conclusion

10.23 The evidence has shown that there have been widespread negative economic impacts in GM because of the Covid-19 pandemic.

10.24 The changing national and local economic conditions that the GM CAP is forecast to operate within due to Covid-19 has required a review of the scheme. GDP is lower, unemployment and redundancies are higher due to the impact of Covid-19. Many businesses have experienced periods of closure, lower turnover and profits, and have depleted reserves and are more indebted.

10.25 The impact of any economic changes on the choices that vehicle owners would make is highly uncertain. The tests run by the ten GM local authorities demonstrate that if vehicle owners were prevented from upgrading their vehicle by the financial circumstances imposed on them by the pandemic, this could have an impact on air quality. The modelled impacts were relatively modest, but it is very difficult to assess whether these represented plausible changes in behaviour.

10.26 It is reasonable to assume that businesses in GM are less well placed than they would previously have been to respond to the GM CAP and upgrade their non-compliant vehicles. A further discussion of this issue is reported separately, in the 'Economic Implications of the GM CAP' report.

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11 Impact of Covid-19 on the availability and cost of compliant vehicles

11.1 This chapter considers the impact of the pandemic on the availability or cost of compliant vehicles; and the potential impact of any changes on the ability of vehicle owners to upgrade to a compliant vehicle in response to the GM CAP.

11.2 The sensitivity test set out in the previous chapter showed that an increase in vehicle prices could act to reduce upgrade and increase NOx emissions.

Evidence on the availability of compliant vehicles

11.3 Covid-19 could affect the availability of compliant vehicles due to:

- Reduction in the number of new vehicles manufactured due to lockdowns;
- Slowing pace of newly manufactured vehicles entering the fleet due to delayed or deferred purchases; and
- Retention of compliant vehicles by existing owners (and thus reduced supply of second-hand vehicles) due to delayed or deferred replacements.

Evidence shows that production of new vehicles was affected by the pandemic, with production in the UK at near zero during April 2020 and remaining well below normal levels by year end, shown in **Figure 11.1.**

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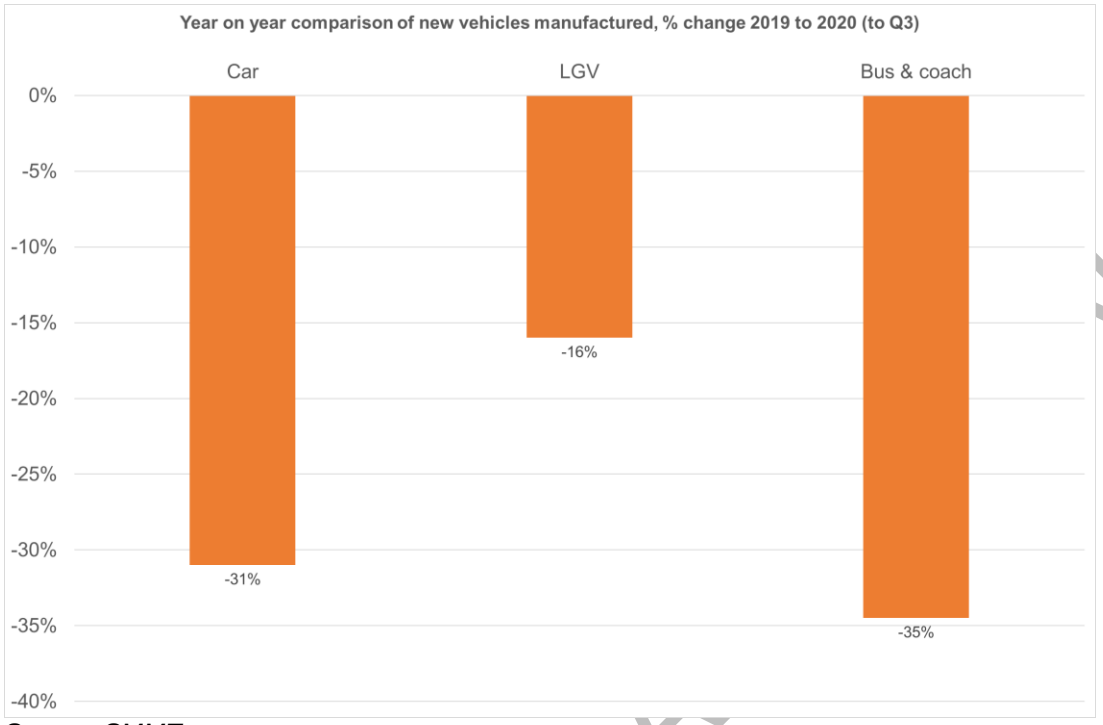
Figure 11.1 Year on year comparison of new vehicles manufactured, % change 2019 to 2020 (to end Quarter 3)



Source: SMMT[40]

Evidence on the cost of compliant vehicles

11.4 The initial lockdown period in 2020 led to a significant shutdown across the economy resulting in an overall reduction in goods output, such as cars. Although there is evidence that demand for new vehicles across different types was reduced during the pandemic, as mentioned in **Chapter 7**, the changes to demand and supply may have resulted in fluctuations in vehicle prices. This may become more apparent through 2021 as the economy is forecast to continue to recover and demand for goods is likely to increase.

11.5 Although there is currently limited evidence on changes in vehicle prices, some high level research has been conducted into the cost of a new compliant Hackney and PHV pre-COVID (2019) and the current cost during the pandemic using various vehicle purchasing websites, such as the Cabdirect website.[41] The results are set out in

11.6

11.7

11.8 **Table 11.1** and **Table 11.2**.

[40] SMMT (2021) https://www.smmt.co.uk/vehicle-data/
[41] Cabdirect (2021) https://www.cabdirect.com/cars/?type=bespoke&make=

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Table 11.1 New Compliant Hackney Cab Price Comparison Pre-Covid to Present

Compliant Vehicle	Pre-COVID Price (2019)	Current Price (2021)[42]
LEVC TX Electric Taxi	Prices starting from £56,000	Prices starting from £53,000
Mercedes Vito	£42,000	£42,000 - £47,000
Peugeot E7	£30,000	£24,000

Table 11.2 New Compliant PHV Price Comparison Pre-Covid to Present

Vehicle Make	Pre-COVID Price (2019)	Current Price (2021)[43]
Skoda Octavia	£19,000 - £31,000	£21,000 - £31,000
Toyota Prius	£20,000 - £28,000	£24,000 - £29,000
Mercedes Vito	£42,000	£42,000 - £47,000

Impact of Covid-19 on the availability and cost of compliant vehicles: Conclusion

11.9 There is evidence that vehicle manufacture in the UK was affected by the pandemic. We believe that this was also the case in some other countries, although there is very limited evidence available. It remains unclear what longer-term impact this could have.

11.10 Similarly, there is very limited evidence on vehicle prices, and markets remain affected by the pandemic in terms of constrained demand. Whilst the taxi market has been suppressed throughout the pandemic, potential changes to vehicle prices may be a more important factor for HGVs and LGVs where demand has returned to pre-pandemic levels and exceeds pre-pandemic levels in some cases.

11.11 Ongoing monitoring will be important to identify any price changes if they emerge and to assess the impact on the GM CAP.

[42] Analysis conducted in January 2021.
[43] Analysis conducted in January 2021.

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12 Impact of Covid-19 on in-scope vehicle owners

12.1 This Chapter summarises analysis that has been undertaken to understand the impacts of Covid-19 by vehicle type, and to assess how vulnerable each vehicle type is to the impacts of the GM CAP.

Bus

12.2 Bus mileage dropped significantly at the outset of the pandemic but recovered quickly due to the provision of Government funding to protect service levels, such that by November 2020, bus mileage was at 95% of normal levels.

12.3 However, patronage was much lower throughout the year, reflecting advice to avoid public transport and travel only when necessary, with greater recovery during periods where restrictions were less. By March 2021, patronage was at about half normal levels.

12.4 Bus manufacturing in the UK was down by 34.5% by the end of Quarter 3 2020 compared to the same period in 2019 and various bus operators were reporting that they had restricted investment to essential capital expenditure only.

12.5 However, the bus retrofit fund opened in December 2020 with high uptake, such that the bus fleet is becoming increasingly compliant despite the pandemic. Furthermore, it is understood that future bus funding from central government CBSSG is to be set with the intention of maintaining existing levels of service provision. Whilst there are typically minor variations in routes and service frequencies over time, an overall trend of mileage reduction is not therefore anticipated within the duration of the GM CAP.

HGV

12.6 There have been no specific restrictions placed on HGV operations due to Covid-19 and much HGV activity has been classified as ‘essential’ throughout and has been able to continue uninterrupted. This is reflected in the traffic statistics which show that HGV activity was at 62% of normal levels during the initial lockdown period, higher than any other mode, and then recovered quickly, with near-normal traffic flows by July. By September 2020, HGV activity was exceeding normal levels.

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12.7 Some sectors that suspended activity initially during the first lockdown were able to establish safe ways of working and therefore were not required to close during the November and January lockdowns. For example, on May 11th 2020 the Government issued guidance on how to safely re-open building sites. Of the small number of hauliers that were initially affected by the lockdown, many were able to switch operations to provide additional capacity in delivering medical supplies and supermarket stock.

Coach and minibus

12.8 Demand for coach and minibus services has been very substantially reduced due to travel restrictions and restrictions on other activities served by the sector such shopping and leisure, events and tourism.

12.9 Many scheduled coach services have been suspended or operating reduced services for at least part of the year. National Express reported that demand fell by 80% initially, with some demand recovering as restrictions were lifted. Services were again reduced during the November lockdown, and all National Express services were suspended from 10th January 2021, but have now resumed.

12.10 School services have been affected by school closures in the spring 2020 and winter 2021 terms. The Home to School scheme has provided funding to coach operators in GM to supply additional coaches for school services allowing social distancing. Around 15-20% of coach operators have benefited from this funding.

12.11 Tourism and leisure travel has been massively reduced in 2020/21 compared to a normal year. VisitBritain reported that as of October 2020 there had been a decline of 79% in spending from overseas tourists and 49% in domestic tourist spending, compared with 2019. According to the Confederation of Passenger Transport (CPT), only 2% of coaches that are usually involved in tourism trips during the spring and summer periods were able to still operate.

12.12 As well as the Home to School funding, coach operators have had access to the Government support schemes such as furlough. However, no bespoke support has been offered to coach operators, and they have been excluded from the rates relief support available to other essential transport services and the tourism and leisure industry.

12.13 It is estimated that around 100 coach operators have gone into administration during the pandemic including GM's biggest operator Shearings. Shearings has been bought by Legar holidays who are intending to recommence their services post-pandemic.

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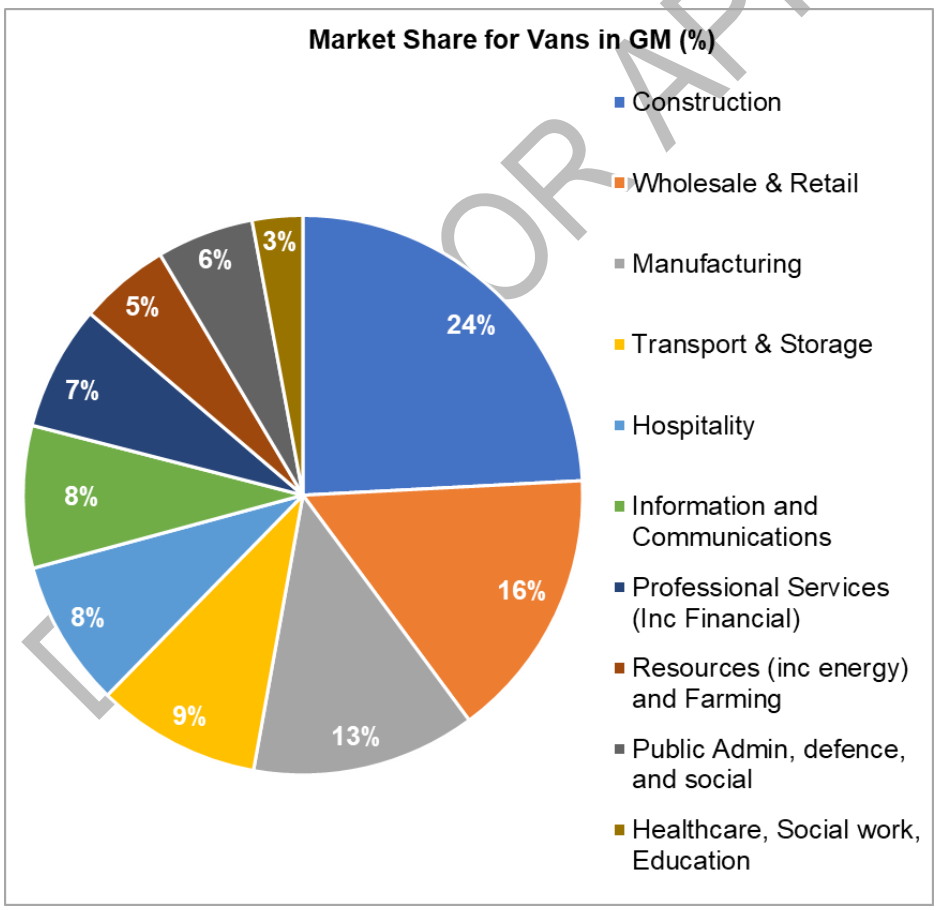
12.14 There is very little statistical evidence of press coverage regarding the minibus sector but a report from the British Vehicle Rental and Leasing Association (BVRLA) produced in September, stated that 94% of their members expect reduced revenues compared to their forecasts pre-Covid-19 but members did not appear to be concerned that they would go out of business. This represents only one part of the minibus sector, with minibuses also owned by bus and coach operators, community transport providers and other community groups, local authorities and schools for example, as well as being in private use.

LGV

12.15 LGVs (or vans) are owned by people operating in a wide range of sectors, as shown in **Figure 12.1**, with Construction (24%), Wholesale and Retail (26%), Manufacturing (13%), Transport and Storage (9%) and Hospitality (8%) the largest sectors.

Figure 12.1 Vans by sector in GM



Source: SMMT 2019 Van Report[44]

[44] Light Commercial Vehicles – Delivery for the UK Economy, SMMT (2019) https://www.smmt.co.uk/wp-content/uploads/sites/2/SMMT-Light-Commercial-Vehicles-Delivering-for-the-UK-economy.pdf

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12.16 LGV traffic has been affected by national lockdowns which restricted business operations, with later lockdowns have a much lesser effect than the initial lockdown period of March to June 2020.

12.17 The impact of the pandemic on LGV owners has varied substantially between sectors, with some sectors experiencing growth (food deliveries and increased online shopping for example), whilst others faced extended periods of closure or reduced activity, such as in the hospitality sector.

12.18 **Table 12.1** overleaf summarises the impacts of the pandemic and implications for the GM CAP for the five largest sectors. The hospitality sector has been the worst hit by Covid-19 but entered the pandemic with the most compliant fleet. The most non-compliant fleet is in the construction sector, which has experienced periods of lockdown and issues with supply of materials, but also high demand for their services.

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Table 12.1 Impact of Covid-19 and the GM CAP on key LGV-operating sectors

Sector	% non-compliant	Description of Covid impacts	Implications for the GM CAP, as at May 2021
Construction	51%	Initial lockdown halted construction. Sites re-opened in May/June, with increased van use arising from a backlog of work and customers keen to begin projects; Increase in home improvements resulting in strong demand for a range of trades but tradespeople report that shortages of materials damaging productivity.	High proportion of non-compliant vehicles needing to respond to CAZ; Pandemic has impacted business finances; High proportion of sole traders operating vans in this sector, with a risk that they could have fallen through the net of COVID-19 support.
Wholesale and Retail	27%	Increased online activity and hence deliveries; Non-essential shop closures affected high street retail, though online shopping habits have maintained demand for vans.	Businesses not as financially vulnerable to COVID-19 as other sectors; Stronger position to respond to the CAZ, increased demand for vans.
Manufacturing	27%	Closures in first lockdown, but continued to operate during subsequent lockdowns, with operational changes to accommodate social distancing.	Business impacts variable across sector. COVID-19 placed additional pressure on finances, making response to GM CAP more challenging.
Transport and Storage	25%	Demand for many products dropped in the first lockdown, impacting the supply chain and companies holding more stock due to issues with supply (also Britain leaving EU); Online retail increased with increase in demand for more/different types of warehouse and distribution units.	Strong demand for postal / courier services during pandemic hence businesses more financially stable and able to respond to the CAZ.
Hospitality	19%	Business closures or reduced capacities for a large proportion of the year.	Sector will have been significantly negatively impacted, which will be reflected in depleted reserves, greater indebtedness etc. More compliant fleet but those that do need to upgrade may be less able to do so.

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Taxi

12.19 The taxi trade – Hackney Cabs and PHVs – has been heavily impacted by the pandemic. There has been a very substantial reduction in demand for taxi services, especially Hackney Cabs, due to the restrictions on travel and large decline in business travel, tourism and international travel, the night-time economy and shopping and leisure activity.

12.20 In May 2020, Cabdirect reported that up to four in five PHV and Hackney drivers had (temporarily) stopped operating. Uber reported a 75% fall in bookings in April to June 2020, compared to 2019, although their UberEats business doubled and there is anecdotal evidence that other drivers diversified into food/parcel deliveries.

12.21 Demand for taxi services has been affected by the reduction in rail and air travel in particular, with rail travel at just 5% of normal levels in April 2020, rising to 42% by September 2020 and anecdotal evidence of very length waits for a fare at ranks of over an hour.

12.22 Taxis account for 29% of onward travel from Manchester Airport. Air passenger numbers were 78% lower in September 2020 than normal, equivalent to 0.7m trips lost in September 2020 alone.

12.23 Manchester City Council licence renewals in summer 2020 found that annual mileage in 2019/20 compared to 2018/19 had reduced by 25% for Hackneys and 25% for PHVs. Similarly, ANPR analysis carried out in September 2020 found that the frequency of taxi movements crossing the ANPR cameras (reflecting activity) fell by 31% for PHVs and 63% for Hackney Cabs.

12.24 Overall, the number of vehicles licensed in GM had fallen by 342 by September 2020, and very few new vehicles entered the fleet, with a reduction against pre-Covid rates in new registrations of >95% and >85%, respectively for Hackney Cabs and PHVs.

12.25 Restrictions are still in place on activities served by taxi, such as large events, international leisure travel and so on. Business travel remains much lower than normal.

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Impact of Covid-19 on in-scope vehicle owners: Conclusion

12.26 HGVs and LGVs in some sectors have been able to operate the most normally, and may have gained growth opportunities as a result of the pandemic. They are likely to be in the most similar position to pre-pandemic.

12.27 LGVs in sectors that have been more affected by the pandemic have experienced periods of closure, reduced turnover and profits, and may have delayed planned vehicle purchases.

12.28 Buses have experienced a substantial drop in passenger demand and therefore revenues, and there is evidence of delays to capital expenditure on new buses as well as reduced production of new vehicles. Nevertheless, high levels of Government subsidy to maintain service levels have reduced the impact on this sector.

12.29 In contrast, passenger vehicles not in receipt of public subsidy – such as taxi and coach – have experienced a very substantial drop in demand, with long periods of closure or low operations and consequent revenue losses. Many vehicles in this sector are privately owned or secured against people's homes, and a relatively high proportion of the fleet is non-compliant.

12.30 Thus, it is clear that whilst most vehicle owners experienced a sharp drop in operations in the first six weeks of lockdown in 2020, the recovery and consequential impact has varied by vehicle type.

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13 Conclusion

13.1 Whilst the Covid-19 pandemic has caused changes that radically altered transport pattens and behaviour, the relaxation of 'lockdown 1' (March to May 2020) travel restrictions from June 2020 led to increasing traffic flows. By the introduction of 'lockdown 2' in November 2020, traffic flows were at around 85% of typical pre-Covid levels. Because the GM CAP is required to take action to tackle NO_2 levels over a number of years into the future, in order to achieve compliance with legal limits, **the nearer term influence of Covid-19 on air quality is not expected to lead to sufficiently long term reductions in pollution such that compliance can be achieved without implementing a Clean Air Zone.**

13.2 **Capital investment in replacement vehicles has been delayed** and as a result the fleet on GM's roads is older and more non-compliant than would otherwise have been the case, worsening emissions. In particular, the car and taxi fleets are estimated to be up to a year older as a result of the pandemic, and these lost upgrades are not expected to be recovered by 2025. LGV upgrades have also been delayed, but the current sales trajectory suggests that much of this delay will have been recovered by 2025.

13.3 Conversely**, although peak hour traffic may reduce due to sustained increases in home working, this is considered likely to have a fairly minimal impact on overall emissions**. More people have worked at home during the pandemic than ever before and there is evidence that a minority of businesses are planning to sustain this to some extent. The likely future level of home working remains highly uncertain, as businesses have not yet had the opportunity to return to normal ways of working and so the extent to which current patterns will be maintained is not yet clear. It does not appear likely that bus mileage will be substantially reduced, given current funding plans, but there may be reasons to be concerned about whether services can be maintained if demand does not return.

13.4 It is evident that **businesses overall have lost revenue, used up reserves and are more indebted and less able to borrow than prior to the pandemic**. A significant minority of businesses remained closed at the end of March 2021. Investment cycles have been and may remain disrupted. This is not affecting all vehicle types or sectors equally.

13.5 This, along with potential constraints on the supply of compliant vehicles, means that **vehicle owners may be less able to upgrade their vehicles in response to the CAZ**. Therefore, they may need more time or financial support to be able to do so.

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13.6 In particular, **Covid-19 appears to have had the greatest impact on passenger vehicles not in receipt of public subsidies – Hackney Cabs, PHVs and coaches** – who have faced a major drop in passenger demand and long periods of low or no operations. For Hackney Cabs and coaches in particular, they entered the pandemic with a highly non-compliant fleet and face high costs to upgrade. Vehicle upgrades have been further delayed during the pandemic.

13.7 **Some LGV sectors have also been badly affected by the pandemic** with extensive periods of closure, whilst others have experienced shorter periods of shutdown and reduced turnover. The picture for LGVs is highly divided, with some sectors experiencing growth and new opportunities as a result of the pandemic. A key issue is those sectors that have experienced economic impacts, where there are a high number of sole traders and very small businesses, and where the fleet was more non-compliant at the outset, such as the Construction sector.

13.8 The evidence presented in this report demonstrates that, as a result of the pandemic, **vehicle owners will not be starting from the same position as had been previously assumed** in terms of their fleets or their ability to upgrade as a result of the GM CAP. This evidence has been considered in the review of the GM CAP Policy post-Consultation.

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Greater Manchester's Clean Air Plan to Tackle Nitrogen Dioxide Exceedances at the Roadside

Appendix 6 – Air Quality Modelling Report following Consultation and with COVID-19 impacts

Warning: Printed copies of this document are uncontrolled

Version Status:	Draft for approval	**Prepared by:**	Transport for Greater Manchester on behalf of the 10 Local Authorities of Greater Manchester
Date:	20th June 2021		

This document is **not** a formal submission, but a draft and unfinished document, prepared ahead of the consultation and submitted so that JAQU can have sight of Greater Manchester's approach to the components that will make up the Full Business Case and provide feedback as work on the measure progresses.

The document and the work within it will therefore be subject to change. Furthermore, once the document is finished it will be subject to formal approval and governance by all 10 Greater Manchester authorities before it can constitute the final formal submission.

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1 Executive Summary

1.1 The Secretary of State has instructed many local authorities across the UK to take quick action to reduce harmful nitrogen dioxide (NO2) levels, and has issued a direction under the Environment Act 1995 to many local authorities undertake feasibility studies to identify measures for reducing NO2 concentrations to within legal limit values in the "shortest possible time". In Greater Manchester (GM) this is being delivered via the Greater Manchester Clean Air Plan.

1.2 GM has been directed by the Government to introduce a charging Clean Air Zone (CAZ) Class C across the region. Certain vehicle types will pay a daily charge for driving inside the zone if they do not comply with emissions standards in the Government's CAZ Framework. Non-compliant vehicles that will be charged are: Buses, Coaches, Minibuses, Hackney Carriages and PHVs (Private Hire Vehicles), HGVs (Heavy Goods Vehicles) and LGVs (Light Goods Vehicles).

1.3 GM has been working to develop the detail of the GM CAZ and associated package of supporting funds, discounts and exemptions for impacted vehicle owners. Following the consultation in late 2020 GM has developed a Post-Consultation Package, which incorporates a Class C CAZ proposed to open in May 2022. This modelling report is based on the Clean Air Plan Policy[1] following consultation, which takes account of the consultation from 2020, and also the impacts of COVID-19 on GM and the CAP.

1.4 Throughout this process GM has used best practice methodology and assumptions to understand the effects of the measures, which have been reviewed and approved by the Joint Air Quality Unit (JAQU) and their Technical Independent Review Panel (TIRP). GM has continued to work closely with Government, including most recently updates to incorporate the impacts of Covid-19 to the Clean Air Plan in accordance with national guidance. GM's proposed approach to updating the modelling was approved by JAQU on 4th May 2021[2]. Updates include a representation of Covid-19 impacts on vehicle fleet and also local investment in electric buses.

1.5 The updated modelling predicts there to be exceedances in all districts with the exception of Oldham and Wigan in the Do Minimum scenarios for 2023. By 2025, exceedances are only predicted in Manchester, Salford, and Bury, which is consistent with the Consultation modelling scenarios. Modelling has not yet been updated for the pre-2023 scenario, but it is expected that all GM authorities would be in exceedance in 2022 without the CAP.

1.6 For the Post-Consultation Package, in 2023 when the GM CAP is fully opened with all measures in place, the proposed scheme is predicted to reduce the number of exceedances from 71 down to 5. These are located at:

[1] Supplied as Appendix 1 to the 25th June 2021 GMCA report 'Greater Manchester Clean Air Plan'
[2] See Appendix C

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- A34 John Dalton St & Bridge St, Manchester (2 exceedances);
- A58 Bolton Road, Bury (2 exceedances); and
- A57 Regent Road, Salford (1 exceedance).

1.7 However, by 2024 with an extra year of natural fleet turnover, the associated additional improvement to vehicle emissions means that there are no exceedances predicted in GM as a result of the reduction in vehicle emissions produced by the GM CAP.

1.8 Therefore, 2024 is the first year of compliance with the legal limits for nitrogen dioxide within Greater Manchester. This is the same as produced by the Consultation Option, and meets the requirements of the Ministerial Direction for such compliance to be achieved by 2024 at the latest. Compliance is achieved three years earlier than predicted without the GM CAP in place. Achieving compliance in Greater Manchester is not possible sooner with the other options that have been suggested.

1.9 Note that a category C CAZ does not apply charges to M1 (or M1 Special Purpose) group of vehicles with a body-type of 'motorcaravan'. However, there is a lack of parity between this classification of vehicle and vehicles with a body type of 'motorcaravan[1]' that have a vehicle type approval of N1 or N2, which are currently liable for a charge under the GM CAZ scheme. To ensure the principle of parity of treatment of all vehicles with body type of 'motorcaravan' it is recommended therefore that that a consultation is held on the inclusion of motorhomes classified as M1 Special Purpose in the GM Clean Air Zone.

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2 Introduction

2.1 Purpose of this Report

2.1.1 This report sets out the results of modelling carried out in May 2021 to forecast air quality in Greater Manchester (GM) in future years, taking into account the impacts of Covid-19, new investment in buses, and reflecting the revised GM Clean Air Plan (CAP) Policy post-consultation.

2.1.2 The report documents changes that have been made to the modelling methodology to reflect the impacts of the Covid-19 pandemic on factors that influence air quality, and other changes that have been made to reflect the newest evidence on investment in ultra low emission buses, as well as any other methodological changes that have been made to the 'Do Minimum' modelling methodology.

2.1.3 The report sets out how the GM CAP Policy following consultation has been represented in the modelling suite, and any relevant methodological changes to the 'Do Something' modelling methodology.

2.1.4 Finally, the report sets out the results of the Do Minimum and Do Something modelling, in other words, the forecast air quality with and without the GM CAP. To date, the modelling has been conducted for 2023 and 2025, with results interpolated for 2024.

2.2 Background to the GM CAP

2.2.1 The Secretary of State has instructed many local authorities across the UK to take quick action to reduce harmful Nitrogen Dioxide (NO_2) levels, issuing a direction under the Environment Act 1995 to many local authorities to undertake feasibility studies to identify measures for reducing NO_2 concentrations to within legal limit values in the "shortest possible time". In Greater Manchester, the 10 local authorities, the Greater Manchester Combined Authority (GMCA) and Transport for Greater Manchester (TfGM), collectively referred to as "Greater Manchester" or "GM", have worked together to develop a Clean Air Plan to tackle NO_2 Exceedances at the Roadside, referred to as the "GM CAP", in response to such a direction.

2.2.2 The core goal of the GM Clean Air Plan is to eliminate concentrations of NO_2 at locations within Greater Manchester identified through the target determination process that exceed the legal Limit Value (40 µg/m^3) in the "shortest possible time" in line with Government guidance.

2.2.3 GM has been directed by the Government to implement the local plan for NO_2 compliance, that includes a charging Clean Air Zone (CAZ) Class C across the region and certain additional measures. Certain vehicle types will pay a daily charge for driving inside such a zone if they do not comply with emissions standards in the Government's CAZ Framework[3]. Non-compliant vehicles that will be charged are: Buses, Coaches, Minibuses, Hackney

[3] https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/863730/clean-air-zone-framework-feb2020.pdf

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Carriages and PHVs (Private Hire Vehicles), HGVs (Heavy Goods Vehicles) and LGVs (Light Goods Vehicles).

2.2.4 A category C CAZ does not apply charges to M1 (or M1 Special Purpose) group of vehicles with a body-type of 'motorcaravan'. However, there is a lack of parity between this classification of vehicle and vehicles with a body type of 'motorcaravan[1]' that have a vehicle type approval of N1 or N2, which are currently liable for a charge under the GM CAZ scheme. To ensure the principle of parity of treatment of all vehicles with body type of 'motorcaravan' it is recommended, therefore, that that a consultation is held on the inclusion of motorhomes classified as M1 Special Purpose in the GM Clean Air Zone.

2.3 GM CAP Policy following consultation

2.3.1 This modelling report is based on the GM CAP Policy following consultation[4], which takes account of the consultation in late 2020, and also the impacts of Covid-19 on GM and the GM CAP.

2.3.2 The anticipated implementation date of the Category C Charging Clean Air Zone is Monday 30th May 2022, with LGVs, minibuses, coaches and GM-licensed hackney carriages and private hire vehicles proposed to be eligible for a temporary exemption from charges to 31st May 2023.

2.3.3 The boundary will cover the whole of Greater Manchester[5], excluding the strategic Road Network (SRN) which is managed by Highways England. The daily charges remain the same as proposed at consultation.

2.3.4 The support funds have changed in many cases from those within the policy for consultation. Feedback from the consultation and the impact of Covid-19 on GM has been used to better understand the requirements of those businesses, individuals and organisations who most need the support to upgrade. As a result, the proposed funding offered per vehicle has been increased for private hire vehicles, coaches, HGVs and larger vans whilst remaining the same for other vehicle types. There are also more options for replacement and retrofit for hackney carriages, PHVs, minibuses and vans.

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[4] Supplied as Appendix 1 to the June 2021 GMCA report 'Greater Manchester Clean Air Plan'
[5] It is now proposed to include, in addition to the roads consulted on, the A575 and A580 at Worsley and a further consultation is proposed to take place on that.

3 Methodology

3.1 Overview of the modelling process

3.1.1 The GM CAP is underpinned by an evidence base derived from data collection, research, analysis and modelling. The results of that analysis were summarised in the report 'Data, Evidence and Modelling: Consultation Summary Report', and set out in detail in a series of Technical Reports and Technical Notes. All published materials can be found at https://cleanairgm.com/technical-documents.

3.1.2 This section sets out a brief overview of the modelling approach followed to assess the air quality impacts of the GM CAP proposal. It sets out how the modelling approach has been updated to reflect the impacts of Covid-19 in line with JAQU guidance and changes to the GM CAP Policy following public consultation.

3.1.3 The purpose of the modelling process is to quantify the impact of traffic by vehicle type on emissions and consequently on concentrations of NO_2 at the roadside in GM.

3.1.4 The modelling process provides a forecast of NO_2 concentrations in the baseline, if no action is taken, and then allows GM to test the impact of different policies and proposals on vehicle fleets, traffic and emissions. Using these modelling tools, GM forecasts NOx emissions and NO_2 concentrations under a range of scenarios for years 2023 and 2025. NO_2 concentrations for interim years and beyond 2025 are interpolated from the results in modelled years. Further modelling will be carried out to assess NOx emissions and NO_2 concentrations for 2022, the opening year of the CAZ; this has not yet been completed.

3.1.5 A brief summary of the modelling input steps feeding into the appraisal is presented in **Figure 3-1**, which shows each of the modelling components and their linkages within the modelling suite. For a full description of the modelling methodology, please see the Technical Reports T1-4 and AQ1-3 (Option for Consultation); these reports will be updated to support the Full Business Case.

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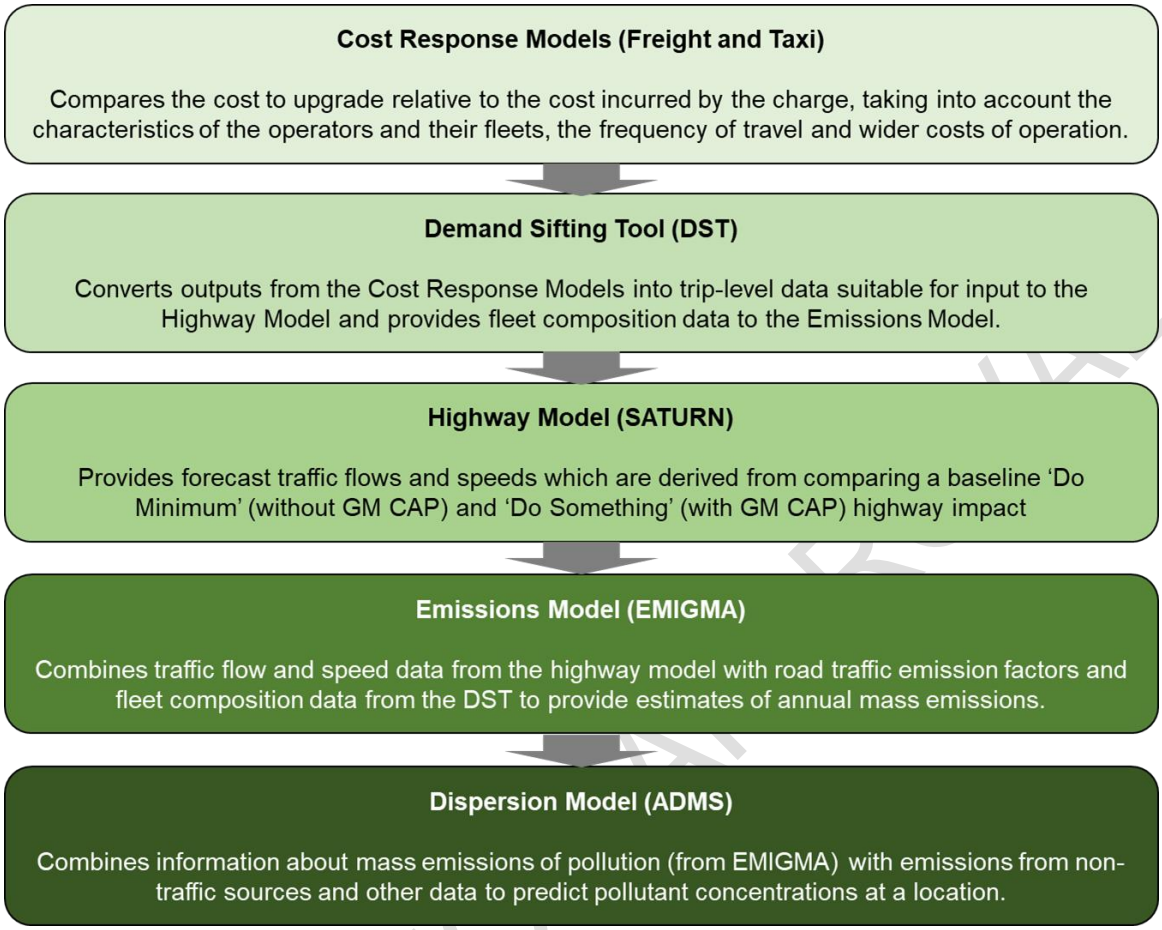
Figure 3-1 Overview of the Modelling Process



3.2 Changes to the modelling approach between OBC and consultation

3.2.1 Since the submission of the OBC, the modelling process has been refined to reflect an improved evidence base and collaboration with Government and stakeholders. As a result, there were several modelling updates which have impacted both the 'Do Minimum' and 'Do Something modelling scenarios which formed the Option for Consultation. Technical Note 24 sets out the updated approach to modelling the 'Do Minimum' scenario, whilst the various improvements that have been made to the 'Do Something' scenario are set out in Technical Note 29 and T4: Local Plan Transport Model Forecasting Report - Consultation Option January 2020.

3.3 Reflecting the delayed launch date

3.3.1 Due to the Covid-19 pandemic, the anticipated launch date of the CAZ has been delayed from 2021 to 2022. Within the modelling suite, the years 2021, 2023 and 2025 can be directly modelled, with interim years estimated via an interpolation process. GM has agreed an approach to representing the 2022 launch date with JAQU[6] and this report presents results from the 2023 and 2025 models only, with interpolated results for 2024.

[6] For details of GM's proposed methodology, see Appendix D and for JAQU's letter of approval see Appendix C to this report.

3.4 Reflecting the impacts of the Covid-19 pandemic in the modelling approach

3.4.1 To understand the wider impacts of COVID-19 the GM CAP team have undertaken an assessment of the possible impacts of COVID-19 to inform a number of technical briefing note for decision makers. The results of this assessment are set out in an Impacts of Covid-19 Report[7].

3.4.2 GM have been in regular liaison with JAQU's technical team to agree methodology, seek guidance and inputs and share early results emerging from the pandemic throughout 2020 and 2021. JAQU supplied written guidance, set out in **Table 3-1**, to inform local authorities how to consider Covid-19 impacts, what sensitivity testing they would like local authorities to carry out and how to consider Covid-19 within economic appraisal and distributional impact assessments. This has been reflected within GM's work programme.

3.4.3 JAQU has approved GM's methodology to assess Covid-19 impacts and reflect those impacts within the modelling and analysis process.

3.4.4 There remains considerable uncertainty with regards to the potential impacts of COVID-19 on travel patterns and services. However, it is already clear that, as a result of the pandemic, vehicle owners will not be starting from the same position as had been previously assumed in terms of their fleets.

3.4.5 Capital investment in replacement vehicles has been delayed and as a result the fleet on GM's roads is older and more non-compliant than would otherwise have been the case, worsening emissions. In particular, the car and taxi fleets are estimated to be up to a year older as a result of the pandemic, and these lost upgrades are not expected to be recovered by 2025. LGV upgrades have also been delayed, but the current sales trajectory suggests that much of this delay will have been recovered by 2025.

3.4.6 As a result, the modelling has been updated to reflect an older and more non-compliant fleet of cars, taxis and LGVs in the 'Do Minimum' and 'Do Something' scenarios.

3.4.7 A change has been applied to the cost modelling process such that those non-compliant LGVs and taxis - hackney carriage and PHV - that would have upgraded to a compliant vehicle without the pandemic but have not done so are assumed not to upgrade as a result of the GM CAP.

3.4.8 Overall, the delay to fleet upgrades has the effect of worsening emissions from those vehicle fleets and brings more taxis and LGVs in scope for charging than previously assumed. Sensitivity testing identified the age of the fleet as the most impactful factor, so by incorporating changes within the

[7] Supplied as Appendix 5 to the June 2021 GMCA report 'Greater Manchester Clean Air Plan'

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core scenario at this stage GM is less sensitive to the impacts of the pandemic.

3.4.9 In terms of the vehicles in scope for the scheme, bus and commercial vehicle traffic has largely returned to pre-pandemic levels (taxi and coach travel remain suppressed). Therefore, it is reasonable to assume that the prior assumptions about traffic volumes for these vehicle types remain valid.

3.4.10 Uncertainty remains around car traffic. Although there is some evidence that, for example, commuter traffic may not return to pre-pandemic levels, GM has taken the conservative approach of assuming that car traffic volumes remain as previously forecast. This is in line with JAQU guidance. Sensitivity testing carried out at OBC suggested that GM was not highly sensitive to small changes in car traffic; further sensitivity testing will be carried out at FBC.

3.4.11 Any other possible impacts of the pandemic that have been identified by GM as plausible and potentially impactful will be considered via sensitivity testing, reflecting JAQU's guidance and continued uncertainty as to the longer-term impacts of the pandemic.

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Table 3-1: Covid-19 related JAQU guidance and GM's response

Date received	JAQU guidance	GM response (all approved by JAQU)
26/05/2020	Requesting sensitivity testing of the 'with measures' scenarios wherein the natural fleet turnover is 'paused' at the level of the previous year; and a second sensitivity test applying a 0% upgrade in response to a CAZ scenario.	GM has conducted sensitivity testing of the impact of a one-year-older fleet. GM agreed with JAQU that a 0% upgrade response test would not be informative in the GM CAP context, as it would be essentially a near Do Minimum position. Instead, GM has conducted a number of sensitivity tests of the assumed behavioural responses. The results of these tests are summarised in the Report: Impacts of Covid-19 on the GM CAP
17/07/2020	Guidance on considering the possible effect of Covid-19 on the economic analysis of the plan, including the value for money assessment, distributional impact and the development of Clean Air Fund bids.	GM has undertaken sensitivity testing of the possible effects of Covid-19 on the value for money assessment, based on a methodology as agreed with JAQU. GM has also carried out a review of the distributional impacts assessment and produced supporting analysis of the impact of the pandemic on each vehicle type in scope for charging under the proposed GM CAZ C.
22/02/2021	Ministerial guidance on the approach to be taken by local authorities in representing the impacts of Covid-19 on their Clean Air Plans (see **Appendix A**). This guidance sets out a Red/Amber/Green (RAG) rating determining whether local authorities are able to apply the results of sensitivity testing of a given factor within their central scenario i.e. whether Covid-related changes to assumptions can be incorporated within the core modelling scenario, or whether they should be considered as sensitivity tests.	GM has conducted a review of the JAQU guidance and considered an approach to revising the modelling methodology in accordance with this guidance and reflecting both (i) sensitivity testing determining which factors could impact the GM CAP and (ii) locally collected evidence on the extent to which these impacts are being realised as a result of the pandemic. GM's approach to revising the local modelling methodology to represent the impacts of Covid-19 is set out in this note, alongside a supporting discussion of the impact of Covid-19 on uncertainty and how this will be reflected within the core scenario and sensitivity testing. (See **Appendix A, Annex 1** for description of RAG rating)

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3.5 Other changes to the modelling approach since consultation

3.5.1 GM has reviewed the assumptions underpinning the highway assignment modelling including bus services and fleet, taxi upgrade assumptions, traffic volumes and composition and future schemes.

3.5.2 Since the previous review of bus services, a fleet of zero emission buses has been deployed on routes in the city centre and further zero emission buses are funded and planned to be in operation from 2023. The highway model will be updated to reflect these new buses, operating on the following services:

- 111, 43 (Chorlton to Manchester City Centre, Manchester Airport to Manchester City Centre) – from 2020.
- Manchester Metroshuttle Free Bus Services (within the City Centre) – from 2023.
- Vantage services (operating through Salford to Manchester City Centre, including along the A34 Bridge St/John Dalton St) – from 2023.

3.5.3 In addition, following the feedback from consultation, evidence of the impact of Covid-19 on the trade, research and stakeholder engagement with the taxi trade, GM has revised its assumption about the proportion of taxis that will upgrade to ZEC, rather than a compliant Euro 6 vehicle, to make it more conservative. It is possible that future regulatory reform, licensing policy, or the impact of investment in charging infrastructure will mean that more taxis than forecast upgrade to ZEC.

3.5.4 The values of time and distance that are used in the Saturn model assignments have been updated based on values of time, GDP growth rates and vehicle operating costs derived from the latest TAG data book, July 2020. This produced modest changes in the assignment parameters and minor changes in routing.

3.6 Considering modelling uncertainty

3.6.1 GM have followed Government guidance in terms of considering modelling uncertainties. A discussion of uncertainty in the modelling of the Option for Consultation is set out in the Analytical Assurance Statement[8].

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[8] Available at https://assets.ctfassets.net/tlpgbvy1k6h2/H7Az0lK4HE78gzyZz0YPy/8a0c304567c41293ac6262d291777405/Analytical_Assurance_Statement.pdf

3.6.2 GM have considered the impacts of Covid-19 on the GM CAP, as set out in the 'Impacts of Covid-19 on the GM CAP Report'[9] and have specifically considered the impact on uncertainty, in line with Government guidance. At the time of writing, the UK is still operating under pandemic-related restrictions on activity and travel. It is therefore too early to say with certainty what the impacts of Covid-19 will be post-pandemic on behaviour, travel patterns, businesses and the economy. The Government's guidance on reflecting the impacts of Covid-19 within the modelling is set out in Appendix A and GM's proposed approach to representing the impact of Covid-19 in core modelling scenarios is set out in Appendix D. This includes a discussion of uncertainty, as section 7 of Appendix D; concluding that there is greater uncertainty as a result of the pandemic, with some aspects potentially worsening air quality and others potentially providing air quality improvements. Overall, Appendix D concludes that it is very unlikely that any improvements to air quality would be of a sufficient scale to mean that action was no longer required.

3.6.3 In order to achieve compliance in the shortest possible time, GM needs to progress the modelling underpinning the GM CAP based on a set of reasonable assumptions about the medium-to-long term impacts of the pandemic. GM has supplied in this report its best estimates of what is likely to happen based on the available evidence.

3.6.4 Nonetheless, uncertainty remains and as a result, sensitivity testing is planned and underway to consider the possible impacts of delayed development plans, increased homeworking, changes to GDP, impacts on public transport, and changes to vehicle purchasing costs and the affordability, feasibility or appeal of upgrade as a result of the pandemic. Sensitivity testing will also be conducted to assess the possible impact of other factors affecting certainty, unrelated to the pandemic.

3.6.5 If the sensitivity testing identifies any potential issues with the plan as it stands, this will indicate that adaptive planning is required and GM will need to work with JAQU to agree mechanisms to facilitate this. Adaptations could include reviewing the charge levels; funding offers; or eligibility criteria for funding, with the aim of further encouraging upgrade if it appears that more people are choosing to stay and pay than forecast. GM could also review permanent discounts and exemptions if it becomes apparent that non-compliant vehicles constitute a greater proportion of the on-the-road fleet than expected.

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[9] Supplied as Appendix 5 to the June GMCA Report 'Greater Manchester Clean Air Plan'

3.6.6 Once the plan is in place, monitoring will be required to ensure that the policy and proposals contained in the GM CAP remain appropriate throughout the lifetime of the interventions. GM will ensure that the Monitoring and Evaluation Plan sets out to address issues where uncertainty remains as to post-pandemic conditions (or for other reasons), as identified in the sensitivity testing, and for example in terms of vehicle fleets, travel patterns and the provision of bus services. If the monitoring reveals issues with the performance of the measures that form the plan, again, an adaptive planning approach will be required, such that GM and JAQU can agree any changes to the plan that would make it more effective.

3.7 Summary of changes to the modelling approach since consultation

3.7.1 In summary, GM has made the following changes to the modelling process since consultation:

- Representation of delayed CAZ launch date of 2022;
- Apply a delay to normal fleet upgrades to the private car, van, and taxi fleets;
- Apply a change to the cost modelling process such that those non-compliant LGVs and taxis - hackney carriage and PHV - that would have upgraded to a compliant vehicle without the pandemic but have not done so are assumed not to upgrade as a result of the GM CAP;
- Update to bus fleet reflecting current deployment of zero emission buses;
- Revision of assumptions about taxi upgrade to ZEC; and
- Updates to assumed values of time and distance, reflecting latest Government guidance.

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4 Representation of the proposed final GM CAP Policy within the modelling approach

4.1.1 The following changes have been made to the package as modelled to reflect the post-Consultation proposed final GM CAP Policy and how this has changed from the Policy for Consultation.

4.2 CAZ Charges

4.2.1 No changes to CAZ charges from the Option for Consultation. Assumed CAZ charges are:

- £60 daily charge – HGV, Bus, Coach;
- £10 daily charge – LGV, Minibus; and
- £7.50 daily charge – Taxi (Hackney & PHV)[10].

4.3 Temporary Exemptions

4.3.1 Temporary exemptions have been extended to end May 2023 for LGVs, minibuses and coaches. Within the modelling, charges assumed to apply to those vehicle types for 2023 (where they are directly modelled).

4.3.2 All GM licensed taxis (Hackneys & PHVs) will be temporarily exempt from the CAZ charge until the end of May 2023, whereas previously only WAV taxis were proposed to be exempt. This will affect the modelling of earlier years but does not impact on the modelling for 2023, 2024 and 2025 as presented here.

Grant Levels

4.3.3 Updated grant levels as modelled are discussed in **Tables 4-1 and 4-2**. It is not possible to reflect the full range of grant options available to vehicle owners within the models, and therefore the tables set out the simplified representation of the grant offer as modelled.

4.3.4 Constraints have been applied within the modelling to reflect the total amount of funding available for each vehicle type. It is not possible to perfectly replicate the funding totals and therefore the constraints applied mean that somewhat less funding is applied within the modelling than will be available in practice. Therefore, the models slightly under-estimate uptake of funds and potentially the total upgrade response for LGVs. This was considered more cautious and appropriate than allowing the funding uptake within the modelling to exceed the total funding allocation.

[10] Note – the package modelling includes an assumption of a discount in PHV charges for use more the 5 days per week, where the CAZ charge is capped at the 5 day charge. This proposal has now been removed from the policy, but remains within the package modelling. Removing this discount from the modelling, would support a further increase in PHV upgrade response, but analysis shows that the impact would be very small.

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Table 4-1: Grant and Retrofit Offers for Commercial Vehicles to be applied in the Cost Response Models

	Option for Consultation	Revised Grant Level
Mode:	**LGV**	
Euro 6 Grant	£3,500 all LGVs	£3,500 1.6t, £4,500 3.5t
Retrofit Grant	n/a	£5,000
Mode:	**HGV**	
7.5t	£2,500	£5,000
18t	£3,500	£7,000
26t	£4,500	£9,000
32t	£5,500	£12,000
44t	£4,500	£6,500
Retrofit		Up to £16,000 (off model calculation assumes £3m allocation)

Table 4-2: Grant and Retrofit Offers for Taxis to be applied in the Cost Response Models

	Option for Consultation	Revised Grant Level
Mode:	**PHV**	
Grant Euro 6	£3,000	£3,000
Grant EV	£3,000	£6,000
Retrofit	n/a	n/a
Mode:	**Hackney (WAV)**	
	London Style	**WAV**
Grant Euro 6	n/a	£5,000
Grant EV	£10,000	£10,000
Retrofit	£5,000	£5,000 (WAV only)
Mode:	**Hackney (Non-WAV)**	
	Non-London	**Non-WAV**
	n/a	As Revised PHV

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4.3.5 Measures to promote the increased uptake of electric vehicles have been modelled using the taxi cost response model to assess the behavioural responses to the CAP and the introduction of incentives for operators to upgrade their vehicles. For the Consultation modelling it was estimated that approximately 15% of taxi and private hire car drivers who operate a compliant vehicle would either purchase an electric vehicle or choose to lease an electric vehicle. A more pessimistic assumption based on the revised behavioural model has been adopted for the latest forecasts, assuming that 3% of taxi drivers would upgrade to an electric vehicle. The air quality impacts of this assumption have been modelled post assignment by reducing the compliant taxi flows that are output from the Saturn model (and that are input to EMIGMA) by 3%, based on the assumption that electric vehicles generate zero emissions at the exhaust.

4.3.6 The forecast behavioral responses generated due to the updated package modelling are presented in **Appendix B**.

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5 Emissions in the Do Minimum and Do Something scenarios

5.1 Modelled scenarios

5.1.1 This section sets out the results of emissions modelling. Modelling has been undertaken for the following scenarios:

- **Do Minimum**, which represents what is forecast to happen in the absence of the CAP proposals; and
- **Final GM CAP Policy** – the Do Something, which represents what is forecast to happen when the GM CAP is introduced.

5.2 Mass Emissions Outputs

5.2.1 Summary results from the EMIGMA modelling for the tests are presented below in **Table 5-1**, which shows modelled mass NOx emission totals for 2023 and 2025 for Greater Manchester as-a-whole, disaggregated by vehicle type.

5.2.2 The results indicate that the CAP is forecast to deliver reductions in mass NOx emissions of approximately 20% relative to the Do Minimum in 2023 and 15% in 2025. These figures are similar to the results for the Consultation Option modelling, which forecast that the Consultation proposals would deliver reductions in NOx of about 22% (relative to the consultation Do Minimum) in 2023 and 17% in 2025.

5.2.3 It should be noted that overall emissions in post-Consultation Do Minimum are approximately 3% greater than the Do Minimum scenario used for the Consultation in 2023 as a result of the increased age of the car, LGV and taxi fleets due to Covid-19. This total mass emissions value also includes a reduction in emissions associated with new electric buses, but these emission improvements are confined to specific bus route corridors.

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Table 5-1 Mass NOx Emission Totals from EMIGMA Modelling (Greater Manchester, Tonnes per Year, with Percentage Changes Relative to the Do Minimum)

2023						
Scenario	**Car**	**LGV**	**HGV**	**Taxi**	**Bus**	**Total**
Do-Minimum	2,799	1,887	796	357	484	6,324
Final Post-Consultation Package	2,803	1,475	378	316	106	5,078
% Change (DM)	0.1%	-21.9%	-52.5%	-11.6%	-78.0%	-19.7%
2025						
Scenario	**Car**	**LGV**	**HGV**	**Taxi**	**Bus**	**Total**
Do-Minimum	2,412	1,610	523	294	344	5,183
Final Post-Consultation Package	2,412	1,287	312	271	106	4,389
% Change (DM)	0.0%	-20.1%	-40.4%	-7.9%	-69.0%	-15.3%

Notes:

Taxis comprise Private Hire Vehicles and Hackney Carriages combined

% Changes for the Final Post-Consultation Package are relative to the Do Minimum

Totals may not sum due to rounding

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6 Air Quality in the Do Minimum and Do Something scenarios

6.1 Overview

6.1.1 This section sets out the results of air quality modelling for the Do Minimum and Do Something scenarios.

6.2 Air quality in the Do Minimum scenario

6.2.1 **Table 6-1** summarises the Consultation modelling results, and the updated modelling post-Consultation incorporating the impacts of Covid-19 results for the Do Minimum years of 2023 and 2025, 2021 model results have not yet been completed. The location of the predicted exceedances in each year are shown in **Figures 6-1 and 6-2** with the spatial pattern closely resembling that in the Consultation modelling.

6.2.2 There is an increase in the number of points of exceedance in 2023 from the Consultation model Do Minimum (from 69 to 71). This is primarily associated with the wider road network outside of the regional centre where car and van emissions have increased due to an older fleet profile due to Covid-19, leading to increases in NO_2 concentrations of typically 0.5 µg/m^3 up to 1.0 µg/m^3. However, on the route corridors where the new electric buses will operate there are improvements, with a reduction in exceedances inside the Inner Ring Road (IRR) on these routes.

6.2.3 By 2025, the number of exceedances reduces due to the natural upgrade of the vehicle fleet, which is expected to continue despite the depressive effect of Covid-19 on some markets, and which has been accounted for where relevant. Compared with the Consultation Do Minimum scenario, there has been a decrease in the overall number of exceedances (from 12 to 11). This is because the most persistent exceedances which still remain are predominantly associated with bus routes, and a proportion of these will now have electric buses in operation.

6.2.4 There are predicted to be exceedances in all districts with the exception of Oldham and Wigan in the Do Minimum scenarios for 2023[11]. By 2025, exceedances are only predicted in Manchester, Salford, and Bury, which is consistent with the Consultation modelling scenarios.

6.2.5 The updated modelling shows results consistent with the methodological modelling alterations described previously. The locations where car and van flows are greatest have an increased number of exceedances, typically sites classed as 'Other Locations'. Those sites in the IRR where bus contributions are most significant have a decreased number of exceedances due to the presence of electric buses. The last points of exceedance (11 in total) in 2025 still remain at:

[11] Note that analysis carried out based upon the Do Minimum modelling as at consultation suggested that all local authorities would remain non-compliant in 2022. Updated analysis for 2022 has not yet been completed.

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- Inside the IRR, including the A34 Bridge St /John Dalton St;
- A57 Regent Rd, Salford;
- A6 Chapel St, Salford; and
- A58 Bolton Road, Bury.

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Table 6-1: Predicted annual mean NO_2 concentrations at points on the Greater Manchester road network – 2021 (Consultation Option version only), 2023 and 2025 without further action ('Do Minimum')

Consultation Option Data – Do Minimum

Road classification[12]	Compliant sites		Non-compliant sites			
	Very compliant (below 35 µg/m³)	Compliant but marginal (35 to 40 µg/m³)	Non-compliant (>40 to 45 µg/m³)	Very non-compliant (>45 to 50 µg/m³)	Extremely non-compliant (>50 µg/m³)	Total non-compliant (>40 µg/m³)
2021						
Inside Manchester-Salford Inner Relief Route (IRR)	150	72	29	19	5	**53**
Urban centres	170	48	14	5	0	**19**
Other locations	1,531	365	100	25	6	**131**
Total	**1,851**	**485**	**143**	**49**	**11**	**203**
2023						
Inside IRR	205	39	21	9	1	**31**
Urban centres	213	20	4	0	0	**4**
Other locations	1,869	150	30	4	0	**34**
Total	**2,287**	**209**	**55**	**13**	**1**	**69**
2025						
Inside IRR	240	27	8	0	0	**8**
Urban centres	233	4	0	0	0	**0**
Other locations	1,990	78	4	0	0	**4**
Total	**2,463**	**109**	**12**	**0**	**0**	**12**

Post-Consultation including Covid-19 Data – Do Minimum

Road classification[3]	Compliant sites		Non-compliant sites			
	Very compliant (below 35 µg/m³)	Compliant but marginal (35 to 40 µg/m³)	Non-compliant (>40 to 45 µg/m³)	Very non-compliant (>45 to 50 µg/m³)	Extremely non-compliant (>50 µg/m³)	Total non-compliant (>40 µg/m³)
2021						
Inside Manchester-Salford Inner Relief Route (IRR)	n/a	n/a	n/a	n/a	n/a	n/a
Urban centres	n/a	n/a	n/a	n/a	n/a	n/a
Other locations	n/a	n/a	n/a	n/a	n/a	n/a
Total	n/a	n/a	n/a	n/a	n/a	n/a
2023						
Inside IRR	209	37	21	8	0	**29**
Urban centres	210	23	4	0	0	**4**
Other locations	1,847	145	31	7	0	**38**
Total	**2,266**	**205**	**56**	**15**	**0**	**71**
2025						
Inside IRR	245	23	7	0	0	**7**
Urban centres	233	4	0	0	0	**0**
Other locations	1,991	35	4	0	0	**4**
Total	**2,469**	**62**	**11**	**0**	**0**	**11**

n/a: Results for 2021 are not available for the Post-Consultation modelling

Note: The total number of predicted points and distribution of those points changes between 2021 and 2023/2025 due to planned changes to the road network.

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12 "Inside Inner Relief Route" is the area encircled by the Inner Relief Route. "Urban centres" are areas that met a definition used for the purposes of air quality modelling for OBC Option testing. "Other locations" are roads outside of Urban centres and the Inner Relief Route.

Figure 6-1: Do Minimum Exceedances in 2023, updated modelling post-consultation and with Covid-19 impacts

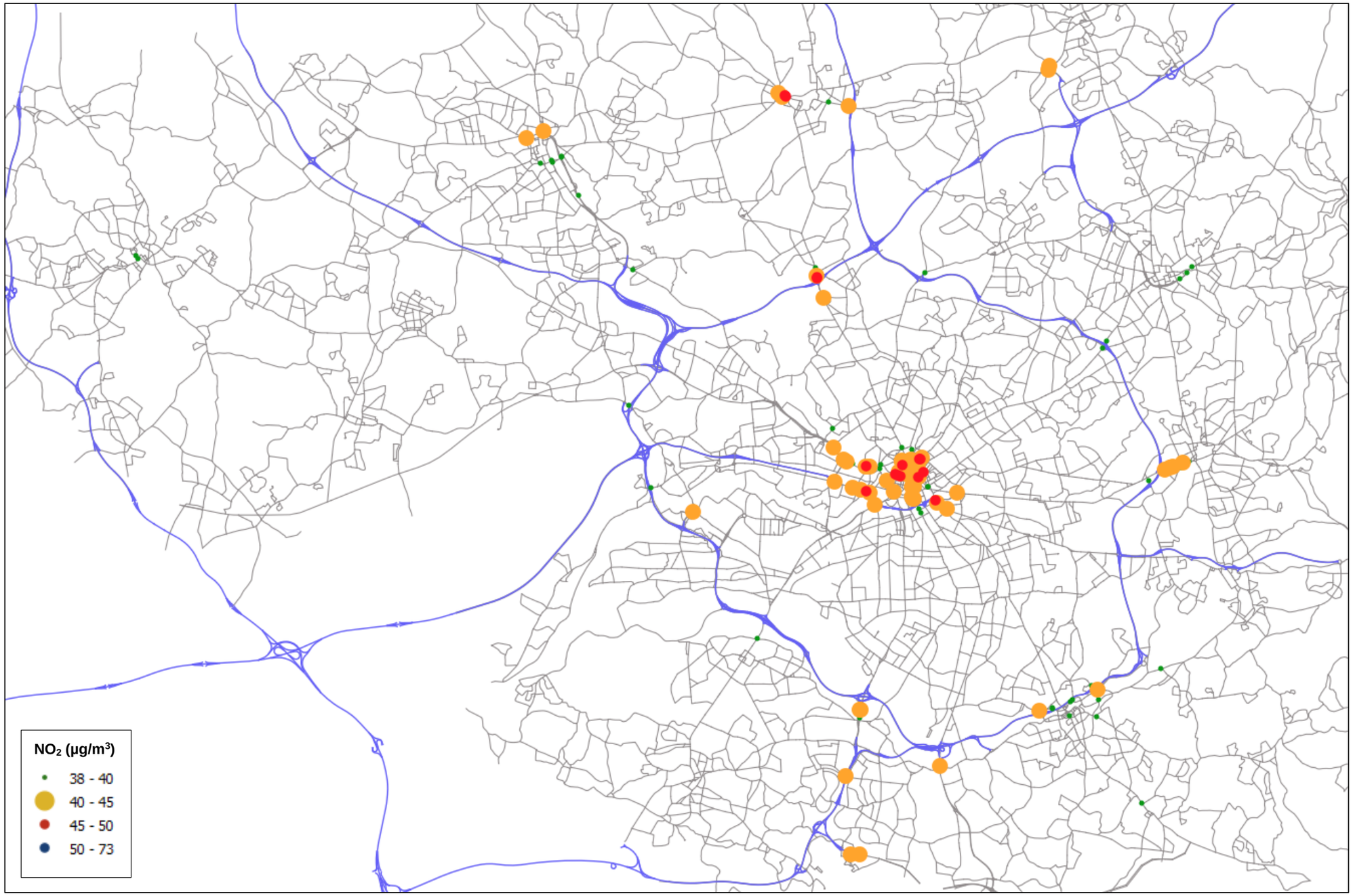
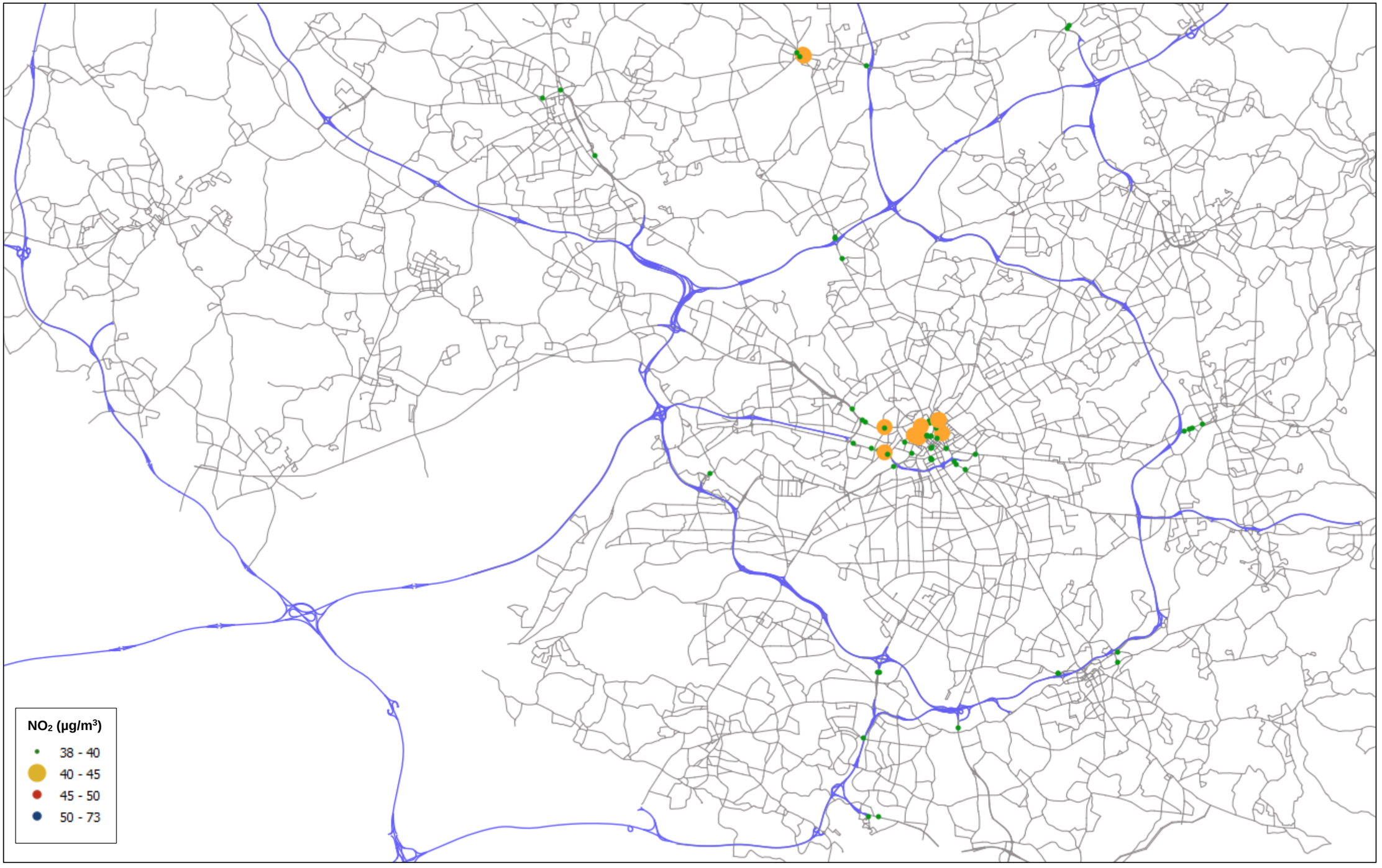


Figure 6-2: Do Minimum Exceedances in 2025, updated modelling post-consultation and with Covid-19 impacts



6.3 Air quality with the final GM CAP Policy

6.3.1 The section summarises the Consultation Option results and the Final Post-Consultation GM CAP Policy, including the impacts of Covid-19, for 2023 and 2025. The exceedances in 2023 are shown in **Figure 6-3**, there are no exceedances remaining in 2025.

6.3.2 With the Final Post-Consultation GM CAP Policy, in 2023 when the GM CAP is fully opened with all measures in place, the proposed scheme is predicted to reduce the number of exceedances from 71 down to 5. These are located at the:

- A34 John Dalton St & Bridge St, Manchester (2 exceedances)
- A58 Bolton Road, Bury (2 exceedances)
- A57 Regent Road, Salford (1 exceedance)

6.3.3 However, in 2024 with an extra year of natural fleet turnover, the additional improvement means that there are no exceedances predicted in GM as a result of the reduction in vehicle emissions produced by the CAP. The 2024 concentrations are calculated by linear interpolation of the 2023 and 2025 model years.

6.3.4 Therefore, 2024 is the first year of compliance within Greater Manchester. This is the same year as produced by the Consultation Option, and meets the requirements of the Ministerial Direction for the local plan for NO_2 compliance by 2024 at the latest. This is three years earlier than the year of compliance predicted without the GM CAP in place. Achieving compliance in Greater Manchester is not possible sooner with the other options that have been suggested.

6.3.5 The points of compliance with the highest concentrations are the A58 Bolton Road, Bury and A57 Regent Road, Salford which in 2024 are both 40.3 µg/m^3 [13]. These sites have received an improvement of 4.8 ug/m^3 and 4.3 µg/m^3, respectively. **Table 6-2** shows the number of sites by local authority, and **Table 6-3** shows the number of sites by scale of exceedance with the Consultation Option and Final GM CAP Policy.

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[13] Noting that values under 40.5 are considered to be compliant.

Table 6-2: Number of sites remaining in exceedance of legal limits for NO2 concentrations by year, Greater Manchester, by local authority

Consultation Option Data

LA	2021		2023		2024 (Interpolated)		2025	
	Do Min	Cons. Option	Do Min	Cons. Option	Do Min	Cons. Option	Do Min	Cons. Option
Bolton	13	6	1	0	1	0	0	0
Bury	16	7	8	1	4	0	1	0
Manchester	76	22	39	4	20	0	9	0
Oldham	9	1	0	0	0	0	0	0
Rochdale	5	2	2	0	2	0	0	0
Salford	36	10	11	0	4	0	2	0
Stockport	21	5	3	0	0	0	0	0
Tameside	13	5	4	0	0	0	0	0
Trafford	7	0	1	0	0	0	0	0
Wigan	7	0	0	0	0	0	0	0
GM Total	**203**	**58**	**69**	**5**	**31**	**0**	**12**	**0**

Final GM CAP Policy Data

LA	2021		2023		2024 (Interpolated)		2025	
	Do Min	Final Package	Do Min	Final Package	Do Min	Final Package	Do Min	Final Package
Bolton	n/a	n/a	2	0	1	0	0	0
Bury	n/a	n/a	9	2	6	0	2	0
Manchester	n/a	n/a	38	2	18	0	7	0
Oldham	n/a	n/a	0	0	0	0	0	0
Rochdale	n/a	n/a	2	0	2	0	0	0
Salford	n/a	n/a	12	1	6	0	2	0
Stockport	n/a	n/a	3	0	1	0	0	0
Tameside	n/a	n/a	4	0	1	0	0	0
Trafford	n/a	n/a	1	0	0	0	0	0
Wigan	n/a	n/a	0	0	0	0	0	0
GM Total	n/a	n/a	**71**	**5**	**35**	**0**	**11**	**0**

n/a: Results for 2021 are not yet available for the Post-Consultation modelling

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Table 6-3: Number of sites by scale of exceedance by year, Greater Manchester road network - 2021, 2023 and 2025

Consultation Option Data

Scheme Option	Compliant sites		Non-compliant sites			
	Very compliant (below 35 µg/m^3)	Compliant but marginal (35 to 40 µg/m^3)	Non-compliant (>40 to 45 µg/m^3)	Very non-compliant (>45 to 50 µg/m^3)	Extremely non-compliant (>50 µg/m^3)	Total non-compliant (>40 µg/m^3)
2021						
Do Minimum	1,851	485	143	49	11	**203**
Consultation Option	2,266	216	52	5	0	**57**
2023						
Do Minimum	2,287	209	55	13	1	**69**
Consultation Option	2,486	33	5	0	0	**5**
2025						
Do Minimum	2,463	109	12	0	0	**12**
Consultation Option	2,522	9	0	0	0	**0**

Final GM CAP Policy Data

Scheme Option	Compliant sites		Non-compliant sites			
	Very compliant (below 35 µg/m^3)	Compliant but marginal (35 to 40 µg/m^3)	Non-compliant (>40 to 45 µg/m^3)	Very non-compliant (>45 to 50 µg/m^3)	Extremely non-compliant (>50 µg/m^3)	Total non-compliant (>40 µg/m^3)
2021						
Do Minimum	n/a	n/a	n/a	n/a	n/a	n/a
Final Post-Consultation Package	n/a	n/a	n/a	n/a	n/a	n/a
2023						
Do Minimum	2266	205	56	15	0	**71**
Final Post-Consultation Package	2471	66	5	0	0	**5**
2025						
Do Minimum	2469	62	11	0	0	**11**
Final Post-Consultation Package	2,526	16	0	0	0	**0**

n/a: Results for 2021 are not yet available for the Post-Consultation modelling

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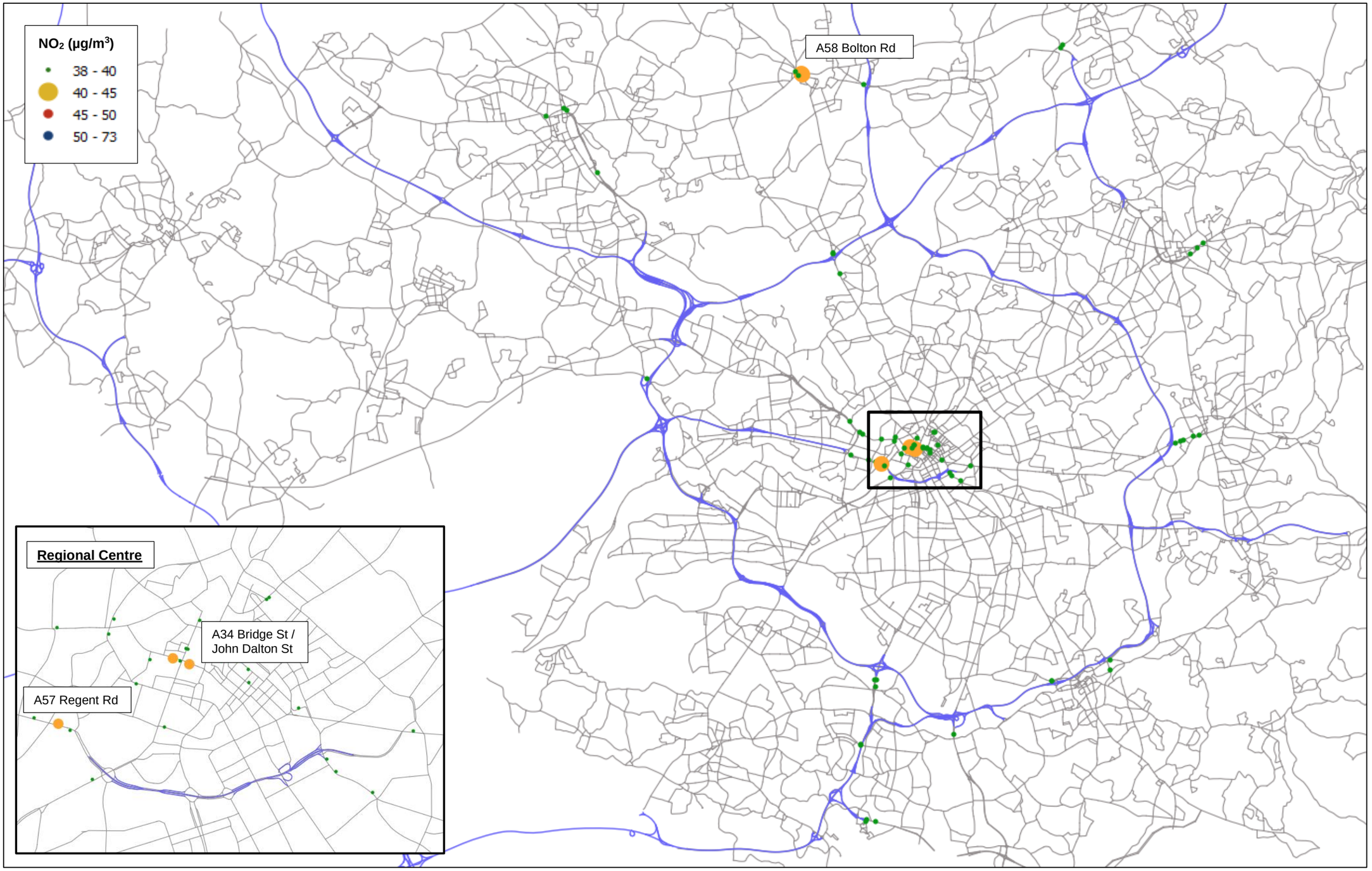
Figure 6-3: Final Post-Consultation Package 2023 Exceedances



7 Summary & Conclusions

7.1.1 This report sets out the changes to, and results of, modelling to forecast air quality in GM, taking into account the impacts of COVID-19, new investment in ultra low emission buses, and reflecting the revised GM CAP Final Policy based on the outcomes of the consultation.

7.1.2 These changes to the modelling apply the assumptions, methodology and sensitivity tests developed in agreement with JAQU based on the extant JAQU guidance for assessing the impact of Covid-19 provided to GM.

7.1.3 The report sets out the results of the Do Minimum and Do Something modelling scenarios, in other words, the forecast air quality with and without the GM CAP, and also compares these with the air quality modelling results for the Option for Consultation. The modelling has been conducted for 2023 and 2025, with results interpolated for 2024.

7.1.4 The impact of Covid-19 is expected to slow the natural turnover of vehicle fleet, as a result of lost new vehicle sales for cars, LGVs and taxis during 2020/21. This has the effect of increasing vehicle emissions in the future worsening air quality predictions, and also increases the number of non-compliant LGVs and taxis in-scope for the CAZ charge. In contrast the investment in electric buses will reduce emissions in both the Do Minimum and Do Something scenarios, along the specific route corridors of operation.

7.1.5 The results of the air quality modelling show that there is a slight increase in the number of points of exceedance in 2023 from the Consultation model Do Minimum (from 69 to 71), and a decrease in 2025 (from 12 to 11). There is a worsening on the general road network where car and LGV emissions have increased due to an older fleet resulting from delayed investment due to Covid-19. However, on the route corridors where the new electric buses will operate there are improvements, with a reduction in exceedances inside the IRR on these routes.

7.1.6 The reason that there is a slight decrease in 2025 versus an increase in 2023 is because the most persistent exceedances which still remain in 2025 are predominantly associated with bus routes, and a proportion of these will now have electric buses in operation.

7.1.7 There are predicted to be exceedances in all districts with the exception of Oldham and Wigan in the Do Minimum scenarios for 2023[14]. By 2025, exceedances are only predicted in Manchester, Salford, and Bury, which is consistent with the Consultation modelling scenarios. Modelling has not yet been updated for the pre-2023 scenario, but it is expected that all GM authorities would be in exceedance in 2022 without the CAP.

[14] The scale and distribution of exceedances remains similar to the forecast as set out in the OBC. The OBC sets out the options appraisal process which determined that a GM-wide CAZ C with supporting measures was the best performing option to achieve compliance in the shortest possible time, and that measures involving local CAZs did not achieve compliance as quickly. See OBC documentation at Technical Documents | Clean Air Greater Manchester (cleanairgm.com)

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7.1.8 The key last points of exceedance (11 in total) in 2025 still remain at:

- Inside the IRR, including the A34 Bridge St /John Dalton St;
- A57 Regent Rd, Salford;
- A6 Chapel St, Salford; and
- A58 Bolton Road, Bury.

7.1.9 For the Final Post-Consultation Package, in 2023 when the GM CAP is fully opened with all measures in place the proposed scheme is predicted to reduce the number of exceedances from 71 down to 5. These are located at:

- A34 John Dalton St & Bridge St, Manchester (2 exceedances);
- A58 Bolton Road, Bury (2 exceedances); and
- A57 Regent Road, Salford (1 exceedance).

7.1.10 However, in 2024 with an extra year of natural fleet turnover, the additional improvement means that there are no exceedances predicted in GM as a result of the reduction in vehicle emissions produced by the CAP.

7.1.11 Therefore, 2024 is the first year of compliance within Greater Manchester. This is the same year as produced by the Consultation Option, and meets the requirements of the Ministerial Direction for the local plan for NO_2 compliance by 2024 at the latest. This is three years earlier than the year of compliance predicted without the GM CAP in place. Achieving compliance in Greater Manchester is not possible sooner with the other options that have been suggested.

7.1.12 Analysis has been conducted assessing the proposed discounts and exemptions, derived from the updated analysis. A report setting out the results of this analysis is supplied as Appendix E.

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Appendix A: JAQU's guidance to local authorities, February 2021

Department for Transport

Department for Environment Food & Rural Affairs

Cllr Andrew Western
Trafford Council,
Trafford Town Hall,
Talbot Road,
Stretford,
M32 0TH

22 February 2021

Dear Andrew,

The Government is implementing the 2017 Air Quality Plan to ensure that compliance with roadside nitrogen dioxide concentrations is achieved in the shortest possible time. Due to the impacts of Covid-19, we are now operating in an environment of considerable uncertainty. Despite these uncertainties we must continue to deliver cleaner air. The future impact of the pandemic on traffic levels and nitrogen dioxide emissions/concentrations will be difficult to predict. Roadside nitrogen dioxide levels will be impacted in the short term by how quickly local traffic flows re-start and in the longer term by several factors (e.g. fleet evolution, home working, modal shift, etc). Analysis and modelling can provide an indication of possible outcomes, however, given the considerable uncertainty we must accept that there is a risk of putting in place clean air measures that overachieve, however, this is preferable to inaction which leads to poor air quality.

JAQU officials have been working with Local Authorities to review the impacts of Covid-19 on their delivery plans and NO_2 levels. Based on these conversations, the data LAs have supplied to us, discussions with our expert panel and our internal review of evidence, we are now in a position to confirm next steps as to how Covid-19 impacts can be applied to central scenarios.

LAs will be able to apply some, but not all, of the results of sensitivity tests to central scenarios, depending on the level of uncertainty associated with underlying assumptions and the impact of the result on the plan. JAQU (with TIRP steer) have RAG rated the sensitivity tests that LAs have discussed with us in **Annex 1**.

LAs can use the test results as follows:

- **"Green"** rated – results can be used to influence central scenario modelling due to a higher level of confidence in the evidence (lower level of uncertainty) and/or small impact on outcomes.
- **"Amber"** rated – results may be used to influence central scenario modelling if the LA has appropriate supporting evidence. The degree of change brought about by these results will also play a factor. JAQU will require the LA to make a strong case for their inclusion, which will be assessed by JAQU and TIRP, with

a recommendation given to Ministers as to whether JAQU supports inclusion of this impact in their core modelling.

- **"Red"** rated – due to the high level of uncertainty with these tests, LAs will not be able to use the results to influence central scenario modelling, however results can be included in business cases to indicate degree of shift possible within the plan.

LAs must note that the evidence required to support Covid-19 assumptions is expected to be of at least the same level of robustness as evidence included in plans as standard. Where evidence does not achieve the required standard the results from the sensitivity tests cannot be applied to the central scenario modelling but may be included as a sensitivity test in the business case submission. LAs that include Covid-19 impacts in the central scenarios will be expected to include KPIs to monitor and evaluate these in their Monitoring & Evaluation plan.

The steps for LAs who intend to apply Covid-19 impacts to their plans are set out in **Annex 2**. The process has been designed to minimise additional delays and provide a swift decision that will enable Local Authorities to proceed in finalising their plans and implementing their measures. LAs will be expected to proceed with applying any approved Covid-19 impacts following a single TIRP and JAQU recommendation and direction or letter (as appropriate). LAs will be expected to agree a timeline with JAQU officials on the submission of their sensitivity test results by 1st March 2021. After TIRP review it is anticipated that should any further modelling be required that an LA should complete this within a maximum of 8 weeks and be done in parallel to current work.

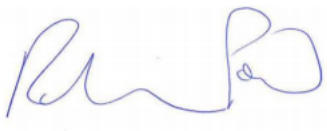
Please do not hesitate to contact your account manager if you have any questions.

Yours sincerely,



RACHEL MACLEAN

PARLIAMENTARY UNDER SECRETARY OF STATE FOR TRANSPORT



REBECCA POW

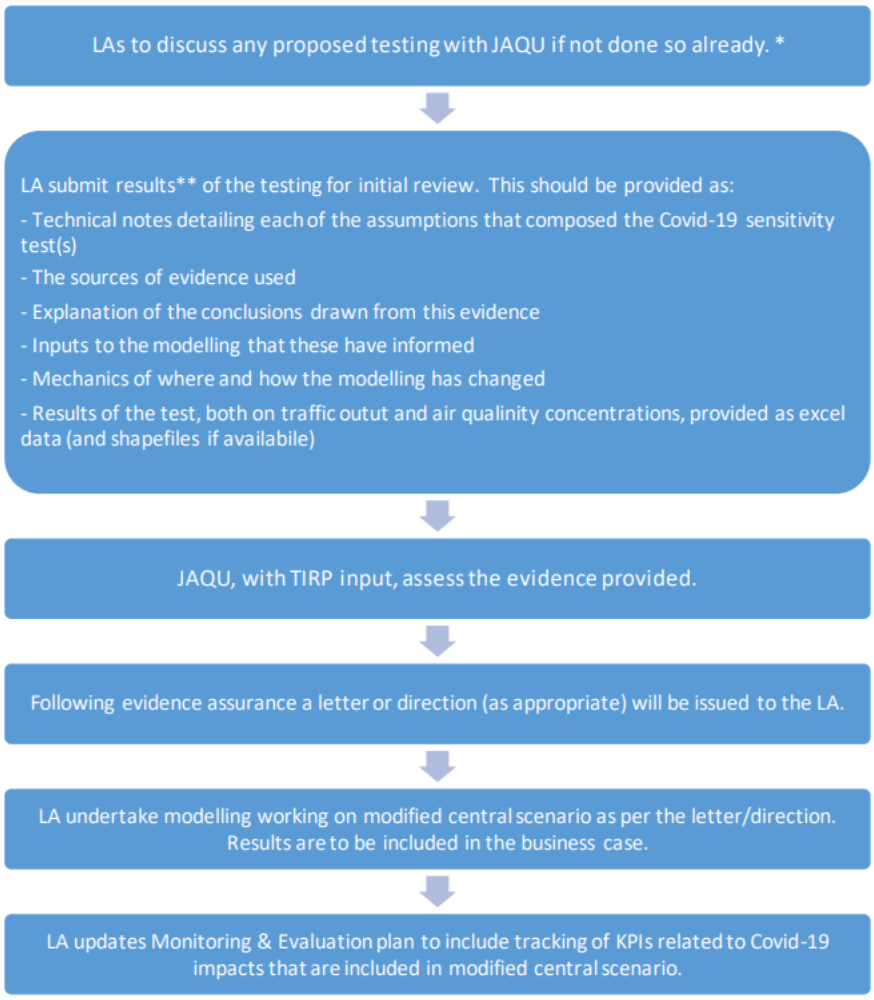
PARLIAMENTARY UNDER SECRETARY OF STATE FOR ENVIRONMENT AND RURAL AFFAIRS

Annex 1: RAG rating for sensitivity tests

Test & RAG status	Justification for categorisation and guidance on what evidence to include
Impacts of a CAZ implementation delay	• Robust evidence within LAs of any delay to CAZ go-live. • Delays simple to model.
Green recovery/measures	• Robust evidence as some LAs have developed measures that have been agreed and in places already implemented through other funding initiatives. • Impact of these tends to be highly localised (single roads, junctions, etc.)
Delayed development plans (new residential or commercial developments /infrastructure, etc.)	• Robust evidence as planning already in progress for these schemes. The original assumed demand for such schemes was known to the LA. • Only schemes of significant size will have a high impact, but most large schemes will have been considered already by LA modelling.
Fleet upgrade delay impacts	• Delay simple to model and national data readily available. • LA may have evidence to support such a delay derived from observed purchasing trends throughout 2020. • Fleet upgrade could be influenced by economic performance depending on timing of CAZ and length/depth of recession.
Reduction in CAZ charges	• LAs set these responses in their modelling based on either locally gathered surveys, central gov estimates or a literature review of similar schemes during plan development. • JAQU does not want to rule out (by putting in red) that an LA may be able to bring together a body of evidence that indicates an adjustment to these assumed response levels is warranted. • Note: JAQU central assumptions will not be updated at this time in respect to Covid-19.
Increased Stay & Pay response	• LAs set these responses in their modelling based on either locally gathered surveys, central gov estimates or a literature review of similar schemes during plan development. • JAQU does not want to rule out (by putting in red) that the LA is able to bring together a body of evidence that indicates an adjustment to these assumed response levels is warranted. • JAQU central assumptions will not be updated at this time in respect to Covid-19.
LGV/HGV change response	• Trend in goods vehicle trips and GDP growth tend to mirror each other.

	• LAs may be able to adequately source bespoke local evidence to warrant a change. Changes to this response would be inspired by local understanding of the types of businesses serviced in the CAZ area and the adaptation/ survival of those businesses post-Covid. • Note: JAQU central assumptions will not be updated at this time in respect to Covid-19.
Increased homeworking	• Level of continued homeworking post-Covid is highly speculative.
Shopping/Leisure trips (increase due to home working and/or reduction due to online shopping)	• Level of shopping and leisure trips post-Covid is highly speculative.
GDP impacts (reduced employment)	• GDP performance is highly speculative.
Impacts on public transport/modal shift (reduction in demand/capacity/supply)	• Short term aversion to public transport is driven primarily by the immediate threat of transmission of the virus so there is an expectation that this does not impact longer term behaviour. • Model limitations used in LA plans may prevent adequate modelling of these impacts (i.e. economic impact and social distancing; change in transport mode preference due to perceived fear of virus, cost of mode, etc.).
Change in car ownership assumptions	• We do not support inclusion of changes of these factors in central scenario modelling. • These factors are highly speculative (based on long term behaviours & GDP, as well as international factors). • Subcategory/consequence of GDP - wider economic, employment forecasting would need to be taken into account. Driven by length and depth of long/short term recession. Also dependent on price of oil/level of subsidy.
Changes to vehicle purchase costs/pricing (fare)	• Speculative (long term behaviours & GDP). • Subcategory/consequence of GDP - wider economic, employment forecasting would need to be taken into account. Dependent on price of oil/level of subsidy/fare.

Annex 2: Steps for LAs to follow



*LAs that have not submitted a baseline at IES stage should include green-rated tests in their baseline.

**Data needed: In addition to those items explained above, if LAs have tested a potential revised package of measures on top of the sensitivity test baseline, this should be provided for review.

***If they wish, LAs are welcome to update Monitoring & Evaluation plans to track KPIs associated with Covid-19 impacts that informed sensitivity tests but were not taken forward into the modified central scenario.

Appendix B: Output Behavioural Responses

The estimated behavioural response for the Final GM CAP Policy 'Do Something' scenario for each of the core modelled modes are presented below for the 2025 forecast year.

LGV (Trips)

	2023	2025
a) Pay Charge	17.8%	16.1%
b) Change Mode (to Car)	3.7%	0.0%
c) Cancel Trip	0.0%	0.0%
d) Upgrade Vehicle	78.6%	83.9%

HGV (Trips)

	2023	2025
Pay Charge	4.9%	1.9%
Change mode (to LGV)	0.0%	0.0%
Cancel Trip	0.0%	0.0%
Upgrade Vehicle	95.1%	98.1%

PHV (Trips)

	2023	2025
a) Pay Charge	19.1%	18.3%
b) Change Mode	0.0%	0.0%
c) Cancel Trip	0.1%	0.0%
d) Upgrade Vehicle	80.7%	81.7%

Hackneys (Trips)

	2023	2025
a) Pay Charge	14.7%	18.6%
b) Change Mode	0.0%	0.0%
c) Cancel Trip	0.0%	0.0%
d) Upgrade Vehicle	85.3%	81.4%

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Appendix C: JAQU's approval of GM's proposed methodology for incorporating Covid-19 impacts with the modelling (May 2021)

Department for Environment Food & Rural Affairs

Department for Transport

Simon Warburton
Transport Strategy Director
TfGM
2 Piccadilly Place
Manchester M1 3BG

4 May 2021

Dear Simon,

The Government is implementing the 2017 UK Plan for Tackling Roadside Nitrogen Dioxide Concentrations to ensure that compliance with legal nitrogen dioxide limits is achieved in the shortest possible time. As described in Minister Pow and Minister Maclean's joint letter dated 22 February 2021, due to the impacts of Covid-19, we are now operating in an environment of considerable uncertainty. Despite these uncertainties we must continue to deliver cleaner air.

Thank you for supplying the results of your sensitivity testing on the impacts of Covid-19 on your local plan. JAQU officials have reviewed the documents and considered the evidence provided along with advice from the Technical Independent Review Panel (TIRP). On this basis, JAQU will support the following impacts being included in your baseline modelling that you presented in "Proposed Approach to representing covid-19 in core modelling":

- Fleet Upgrade Delay
- Change in Implementation Year (2022)
- Green Recovery Measures
- Stay and Pay Changes (with outputs of "Option b" of Table 5.1 also presented, see Annex 1)

More detailed TIRP feedback can be found in Annex 1.

Due to the high level of uncertainty associated with the following impacts, JAQU will not support inclusion in your baseline modelling of the following elements, however they can be included in the business case as sensitivity tests to indicate the degree of shift possible within the plan:

- Delayed development plans

- Increased homeworking
- GDP impacts
- Impacts on Public Transport
- Changes to vehicle purchasing costs

Should you wish to monitor these aspects you are welcome to include additional KPIs in your Monitoring and Evaluation plan, however, you are not required to do so.

The application of the approved impacts to baseline modelling must be completed within 8 weeks from the date of this letter and be done in parallel to current work.

JAQU and the TIRP will review the outputs of these adjustments to baseline modelling, and the outputs to the post-consultation package modelling, in June.

Please do not hesitate to contact your account manager if you have any questions.

Yours sincerely,



ANDREW JACKSON
HEAD OF THE JOINT AIR QUALITY UNIT

Annex 1: TIRP feedback report on "Proposed approach to representing Covid 19 in core modelling"

From meeting of 27.4.2021

Section	Commentary	Agree with proposed changes?
3: 2022 model year	Very detailed explanation of method, thanks. It is fortunate that 2021 and 2023 both exist to allow an interpolation between two years with close proximity. Please highlight any risks around this approach and include them in the final reporting.	Yes, agree with proposed changes.
4: Fleet Upgrade Delay	Have examined the current position (what delay has occurred as of Jan 2021) and the current evidence base is well presented. A key assumption is that over the next 12 months there won't either be a "catch up" or indeed further delays, however the proposed approach represents a relatively neutral position. The sensitivities already explored (no upgrade delay and 1 year delay) provide useful benchmarks to the potential scale of impact. Please include these sensitivities the post-modelling AAS. The panel query whether wider TfGM plans (or the changes to plans that may have been precipitated due to covid) could play a part in the upgrade delay	Yes, agree with proposed changes.

	or any further delay or "catch up".	
5: adjusting behavioural responses	Speculation is impossible to avoid here however, option c of table 5.1 does follow evidentially from the fleet upgrade evidence presented in section 4. These pieces of evidence build the new construct in option c. Acknowledge that c is the more cautionary approach (in terms of impact on air quality) however it is difficult to decide which is the likelier to occur as neither b nor c have definitive evidence. Please consider whether it is feasible to perform both options to illustrate the scale of the difference between these two sensitivities.	If b were to be followed instead of c, how much of a difference in the transport outputs (extrapolated loosely through to emissions) would this make? Please include reference to this in reporting if c is selected.
7: adaptation to AAS	Thanks, these points are thoughtful and detailed. To what extent will these revisions affect work that's being done? Table provided illustrates vulnerabilities but does not specify whether action can/will be taken. If no action can feasibly be taken that is okay.	n/a
Further comments	GM have done a very good job in terms of capturing all the uncertainty.	n/a

Appendix D: GM's proposed approach to representing the impact of Covid 19 in core modelling scenarios

See separate document

Appendix E: Note 38: Discounts & Exemptions – updated with final GM CAP Policy

See separate document

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Greater Manchester's Clean Air Plan to tackle Nitrogen Dioxide Exceedances at the Roadside

Appendix 6D - GM's proposed approach to representing the impact of Covid 19 in core modelling scenarios

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Version Status:	DRAFT FOR APPROVAL	**Prepared by:**	Transport for Greater Manchester on behalf of the 10 Local Authorities of Greater Manchester
Date:	20 June 2021		

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1 Introduction and context

1.1 Covid-19 Impacts on CAP Modelling

1.1.1 This Technical Note sets out GM's proposed approach to developing assumptions based on appropriate emerging evidence and projections of the Covid recovery. In response to JAQU's guidance of 22nd February 2021, it sets out how GM proposes to reflect Covid-19 impacts in GM's central Do Minimum and Do Something scenarios.

1.1.2 The definition of a preferred set of assumptions will then be based on the approach set out herein, for necessary GM governance and approvals, as well as agreement with JAQU. These preferred assumptions will then be used to define the modelling required for the FBC submissions. Wherever possible, these have been informed by central government guidance and the most recent available evidence.

1.2 Background

1.2.1 Greater Manchester (GM) district authorities have been mandated by the Government to to take quick action to reduce harmful Nitrogen Dioxide (NO2) levels, issuing a direction under the Environment Act 1995 to undertake feasibility studies to identify measures for reducing NO2 concentrations to within legal limit values in the "shortest possible time". In Greater Manchester, the 10 local authorities, the Greater Manchester Combined Authority (GMCA) and Transport for Greater Manchester (TfGM), collectively referred to as "Greater Manchester" or "GM", have worked together to develop a Clean Air Plan to tackle NO2 Exceedances at the Roadside, referred to as GM CAP.

1.2.2 The GM CAP is underpinned by a programme of transport, emissions and air quality modelling to identify the scale of the poor air quality challenge and to test the effectiveness of these specific measures and packages of measures in combination. This process is described in the following reports:

- Local Plan Transport Modelling Tracking Table (T1), which is a live document, that is intended to demonstrate that the modelling requirements for the study are being met;
- Local Plan Transport Highway Model Validation Report (T2), which explains in detail how the road traffic model was validated against real-world data in the base year (2016);
- Local Plan Transport Modelling Methodology Report (T3), which describes the approach taken to forecast traffic in 2021 and beyond to 2023 and 2025; and
- Local Plan Air Quality Modelling Tracker Table (AQ1) and Methodology Report (AQ2), which provides an overview of the air quality modelling process and evidence base.

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1.2.3 These reports were published at OBC and were updated in January 2020 to support the consultation process.

1.2.4 The results of the analysis carried out at OBC were presented in the Strategic and Economic cases of the OBC and associated appendices, and in the following reports:

- Local Plan Transport Model Forecasting Report (T4), which describes the transport modelling process and results for the Greater Manchester Clean Air Plan Project; and
- Local Plan Air Quality Modelling Report (AQ3), which provides details of modelled NOx and NO_2 concentrations for the base and forecast years, including comparisons with measured concentrations for the base year.

1.2.5 Revised versions of the Local Plan Transport Model Forecasting Report (T4) and Local Plan Air Quality Modelling Report (AQ3) were produced in January 2020 setting out the process applied to testing of the Package for Consultation, and the results of that modelling.

1.2.6 The appraisal of the economic impacts and value for money of the GM CAP was presented in the Economic case of the OBC, and the methodology for this analysis is described in the following reports:

- E1 – Economic Appraisal Methodology Report;
- E2 – Economic Appraisal Model; and
- E3 – Distributional Impacts Report.

1.2.7 These reports were updated in November 2020 and submitted with the Interim Full Business Case, based on a pre-Covid 19 modelling position.

1.2.8 Final revisions of the Technical and Economic Reports will be carried out and submitted with the Full Business Case (FBC). These will apply the proposed revisions to the methodology as set out in note 'Proposed approach to representing the impacts of Covid 19 in the core scenario for the GM CAP' as well as any changes to the proposed package of measures post-Consultation.

1.2.9 GM decided to proceed with consultation on the basis of the Package for Consultation, based on pre-Covid 19 assumptions and modelling, and to include questions about the Covid 19 impact in that Consultation. The Consultation closed in December 2020. Analysis of the results of that Consultation is now underway and will be reported to the GMCA and ten local authorities in summer 2021, alongside a report summarising the modelled impact of the proposed changes on compliance. Any implications of the Consultation on the package of measures or modelling process have not yet been considered.

1.3 <u>Overview of the modelling process</u>

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1.3.1 The modelling for the study is being undertaken using the CAP modelling suite as illustrated below in Figure 1-1:

Figure 1-1 CAP Modelling Suite



1.3.2 The modelling system consists of five components:

- The demand sifting tool, which has been developed to allow measures to be tested in a quick and efficient way prior to detailed assessments being undertaken using the highway and air quality models. The sifting tool uses fleet specific Cost Response models to determine behavioural responses to the CAP proposals (pay charge, upgrade vehicle, change mode, cancel trip etc.) The outputs comprise demand change factors which are applied to the do-minimum Saturn matrices to create do-something demands for assignment.
- The highway (Saturn) model, which uses information about the road network and travel demands for different years and growth scenarios to estimate traffic flows and speeds for input to the emissions model and forecasts of travel times, distances and flows for input to the economic appraisal.
- The emissions model, which uses TfGM's EMIGMA (Emissions Inventory for Greater Manchester) software to combine information about traffic speeds and flows from the Saturn model with road traffic emission factors and fleet composition data from the Emission Factor Toolkit (EFT) to provide estimates of annual mass emissions for a range of pollutants including oxides of nitrogen (NOx), primary-NO_2, particulate matter (PM_{10} and $PM_{2.5}$) and CO_2.
- The dispersion model, which uses ADMS-Urban software to combine information about mass emissions of pollution (from EMIGMA) with dispersion parameters such as meteorological data and topography to produce pollutant concentrations.
- Finally, the outputs of the dispersion model are processed to convert them to the verified air quality concentrations, using Defra tools and national background maps.

1.3.3 The purpose of the modelling is to identify the preferred option for delivering air quality compliance in the shortest possible time, and to provide supporting analyses for the development of the business case submissions.

1.4 <u>Analysis of Covid 19 Impacts on the GM CAP</u>

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1.4.1 Since the modelling for the Consultation Option was undertaken, the onset of the Covid 19 pandemic and the associated restrictions to travel and the economy have impacted on a range of the assumptions used within the modelling approach for the CAP. In response, GM undertook a programme of modelling and analysis to assess the impact of the pandemic on the GM CAP. This programme included:

- A review of risks and assumptions;
- Scenario planning and brainstorming exercise, carried out with TfGM's Strategy team to incorporate considerations beyond the GM CAP;
- Monitoring of real-world conditions;
- Impacts assessments by vehicle type and distributional impacts;
- Research, data collection and Consultation; and
- Sensitivity testing of transport, AQ and economic models, based on indicative or hypothetical scenarios and applying JAQU's guidance.

1.4.2 The results of this analysis have been fed back to GM's ten local authorities and to JAQU and are set out in a series of Technical Notes supplied to JAQU. A report setting out the impact of the proposed changes on the Do Minimum position, alongside modelling of the impact of the post-Consultation package on achieving compliance in the shortest possible time will be available in early summer 2021.

1.4.3 GM's analysis suggested that the following key factors were both plausible and potentially impactful:

- Vehicle upgrades slow, with fewer new vehicles entering the fleet and older vehicles remaining in the fleet for longer;
- A sustained increase in working from home reduces commute traffic, particularly in peak periods;
- Bus mileage may reduce if patronage does not recover to pre-pandemic levels, unless subsidies are maintained to prevent this;
- Businesses may be less able to upgrade in response to the GM CAP, due to having exhausted their reserves, taken on debt, suffered shutdowns and so on; and/or
- Availability of compliant vehicles may be constrained, and/or prices may rise.

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2 JAQU guidance and GM's response to it

2.1 Interaction with JAQU

2.1.1 Following the OBC submission in March 2019, technical discussions concerning the behavioural, traffic and air quality modelling recommenced in April 2019 on a regular fortnightly basis. Additional technical documentation was provided to JAQU in the form of a series of technical notes. The revised methodology as set out in these notes was approved by JAQU in November 2019, and reflected in the updated Technical Reports submitted in January 2020.

2.1.2 The economic appraisal methodology was updated and agreed with JAQU in spring 2020, reflected in updated Economic Reports submitted as appendices to the Interim FBC in November 2020.

2.1.3 Following the start of the first national lockdown in March 2020, GM held several technical discussions throughout 2020 and 2021 with JAQU to consider the impact of the pandemic on the GM CAP.

2.1.4 GM have submitted a number of draft technical notes to JAQU as part of this process[1], as set out in Table 2-1 below. It is intended that an updated version of the analysis contained in these notes will be set out in a report to GM's ten local authorities in summer 2021, superseding the notes.

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[1] Note that two further notes, CV13 and CV14, were planned but not submitted and the planned contents of note CV6 (an initial assessment of Covid 19 impacts on Analytical Assurance) have been incorporated in this note.

Table 2-1: GM CAP Covid 19 Technical Notes

Number	Title
CV1	Sensitivity test of a delay in fleet upgrade resulting from the Covid 19 pandemic
CV2	Covid 19 Related Sensitivity Testing: Zero Upgrade Test Considerations
CV3	Sensitivity test of increased working from home resulting from the Covid 19 pandemic
CV4	Sensitivity testing of Covid 19 impacts on behavioural responses
CV5	Sensitivity testing of Covid 19 impacts on bus
CV7	Review of Covid 19 impact on modelling methodology as set out in T3
CV8	Review of Covid 19 impact on modelling methodology as set out in T4
CV9	Review of Covid 19 impact modelling methodology as set out in AQ2 and AQ3
CV10	Covid 19 Impacts – HGV
CV11	Covid 19 Impacts – LGV
CV12	Covid 19 Impacts – Coach & Minibus
CV15	Summary data note - Monitoring traffic conditions during the pandemic
CV16	Specialised Goods Vehicle Counts (2020)

2.2 JAQU guidance and GM response

2.2.1 JAQU have supplied three sets of modelling-related guidance to local authorities, as set out in Table 2-2, which also sets out GM's actions in response to that guidance.

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Table 2-2: Covid 19 related JAQU guidance and GM response

Date received	JAQU guidance	GM response
26/05/2020	Requesting sensitivity testing of (i) the 'with measures' scenarios wherein the natural fleet turnover is 'paused' at the level of the previous year; and (ii) a second sensitivity test applying a 0% upgrade in response to a CAZ scenario.	GM has conducted sensitivity testing of the impact of a one-year-older fleet, supplied as *Note CV1 – Sensitivity test of a delay in fleet upgrade.* GM agreed with JAQU that a 0% upgrade response test would not be informative in the GM CAP context, as it would be essentially a near Do Minimum position, as set out in *Note CV2 – Zero upgrade test considerations.* Instead, GM has conducted a number of sensitivity tests of the assumed behavioural responses, set out in *Note CV4 – Sensitivity test of Covid 19 impacts on behavioural responses.*
17/07/2020	Guidance on considering the possible effect of Covid 19 on the economic analysis of the plan, including the value for money assessment, distributional impact and the development of Clean Air Fund bids.	GM has undertaken sensitivity testing of the possible effects of Covid 19 on the value for money assessment, based on a methodology as agreed by email on 30/11/2020. GM has also carried out a review of the distributional impacts assessment and produced supporting analysis of the impact of the pandemic on each vehicle type in scope for charging under the proposed GM CAZ C.
22/02/2021	Ministerial guidance on the approach to be taken by local authorities in representing the impacts of Covid 19 on their Clean Air Plans (see Appendix One on page 53 of this document). This guidance sets out a Red/Amber/Green (RAG) rating determining whether local authorities are able to apply the results of sensitivity testing of a given factor within their central scenario ie: whether Covid-related changes to assumptions can be incorporated within the core modelling scenario, or whether they should be considered as sensitivity tests.	GM has conducted a review of the JAQU guidance and considered an approach to revising the modelling methodology in accordance with this guidance and reflecting both (i) sensitivity testing determining which factors could impact the GM CAP and (ii) locally collected evidence on the extent to which these impacts are being realised as a result of the pandemic. GM's proposed approach to revising the local modelling methodology to represent the impacts of Covid 19 is set out in this note, alongside a supporting discussion of the impact of Covid 19 on uncertainty and how this will be reflected within the core scenario and sensitivity testing.

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2.2.2 On 22nd February 2021, JAQU provided GM with Ministerial guidance on the approach to be taken by local authorities in representing the impacts of Covid 19 on their Clean Air Plans (see Appendix One for details). This guidance sets out a Red/Amber/Green (RAG) rating determining whether local authorities are able to apply the results of sensitivity testing of a given factor within their central scenario. The RAG rating is defined as follows:

- "Green" rated – results can be used to influence central scenario modelling due to a higher level of confidence in the evidence (lower level of uncertainty) and/or small impact on outcomes.
- "Amber" rated – results may be used to influence central scenario modelling if the LA has appropriate supporting evidence. The degree of change brought about by these results will also play a factor. JAQU will require the LA to make a strong case for their inclusion, which will be assessed by JAQU and TIRP, with a recommendation given to Ministers as to whether JAQU supports inclusion of this impact in their core modelling.
- "Red" rated – due to the high level of uncertainty with these tests, LAs will not be able to use the results to influence central scenario modelling, however results can be included in business cases to indicate degree of shift possible within the plan.

2.3 Tables 2-3, 2-4 and 2-5 below set out JAQU's guidance for local authorities and GM's response to that guidance. To inform GM's response, GM has reviewed the assumptions underpinning each stage of the modelling process. A summary of the results of that review is set out in Technical Notes CV7, 8 and 9.

2.4 JAQU's guidance states that "LAs must note that the evidence required to support Covid-19 assumptions is expected to be of at least the same level of robustness as evidence included in plans as standard." Where changes are proposed to the methodology for the core scenario, the rationale for their inclusion is set out in Sections 3 to 5.

2.5 Note that GM carried out a series of indicative sensitivity tests exploring the impact of potential changes to factors affecting the GM CAP as a result of Covid 19, based on the Do Minimum and GM CAP Policy for Consultation modelling as set out the Technical Reports submitted in January 2020. Further Covid-related sensitivity testing, as set out below, will be carried out on the final post-Consultation modelling and will be submitted as appendices to the FBC, alongside any other sensitivity testing required to assess the robustness of the Plan.

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Table 2-3: "Green-rated" factors and GM's proposed approach to representing them

Factor	JAQU commentary	To be applied in GM?	GM commentary
Impacts of a CAZ implementation delay	Robust evidence within LAs of any delay to CAZ go-live. Delays simple to model.	**Yes**	The pandemic has resulted in a delay to the proposed launch date of the GM CAZ to spring 2022. GM has fully developed versions of the modelling suite for the years 2021, 2023 and 2025. It is not possible to produce a 2022 version of the modelling suite without imposing significant delay and cost. Therefore, GM proposes to apply the following approach: 1. Development of 2022 versions of the Demand Sifting Tool and cost models; and 2. Application of an interpolation process between 2021 and 2023 to estimate emissions and compliance by site in 2022. Further detail is supplied in Section 3.
Green recovery/measures	Robust evidence as some LAs have developed measures that have been agreed and in places already implemented through other funding initiatives. Impact of these tends to be highly localised (single roads, junctions, etc.)	**Yes**	Since the previous review of bus services, a fleet of zero emission buses has been deployed on routes in the city centre. The highway model will be updated to reflect these new buses. Several temporary road schemes have been put in place during the pandemic. Although it is possible that they may continue, or that other schemes could be introduced which affect traffic patterns or the road network, the GM CAP team is not currently aware of any new funded and approved schemes of this nature and therefore no new schemes will be represented in the highway modelling.

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Factor	JAQU commentary	To be applied in GM?	GM commentary
Delayed development plans (new residential or commercial developments /infrastructure, etc.)	Robust evidence as planning already in progress for these schemes. The original assumed demand for such schemes was known to the LA. Only schemes of significant size will have a high impact, but most large schemes will have been considered already by LA modelling.	**As sensitivity test only**	There are a number of road schemes assumed to be in the reference case road network modelling programmed to open in 2023 or 2025 that have been delayed during the GM CAP development. These are: • Western Gateway Infrastructure Scheme (WGIS); • M60 Junction (Jn) 24-27 smart motorway scheme; and • M60 Jn 1-4 smart motorway scheme. A test of the potential impacts of excluding these schemes on vehicle routing has been undertaken, indicating that these cannot be screened out based on relevant national government guidance scoping criteria (Design Manual for Roads and Bridges - LA 105 - Air quality, Nov 2019). However, it is not anticipated that the changes to traffic flows will materially alter air quality at key locations for consideration of the GM CAP. Therefore, a test of the Consultation Option model, excluding the Full WGIS and M60 Jn 24-27 and Jn 1-4 smart motorway schemes (those elements of the WGIS scheme that have been built will be included) will be undertaken as a sensitivity test but changes will not be applied in the core scenario.

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Table 2-4: "Amber-rated" factors and GM's proposed approach to representing them

Factor	JAQU commentary	To be applied in GM?	GM commentary
Fleet upgrade delay impacts	Delay simple to model and national data readily available. LA may have evidence to support such a delay derived from observed purchasing trends throughout 2020. Fleet upgrade could be influenced by economic performance depending on timing of CAZ and length/depth of recession.	**Yes**	GM considers that there is now credible evidence that some vehicle fleets will experience sustained delay impacts throughout the lifetime of the Plan. As a result, GM is proposing to apply alterations to the without-scheme fleet upgrade assumptions for private cars, vans and taxis (Hackney and PHV). GM is not proposing to apply alterations to the fleets for HGV or bus. Further information about the changes proposed is set out in Section 4.
Reduction in CAZ charges	LAs set these responses in their modelling based on either locally gathered surveys, central gov estimates or a literature review of similar schemes during plan development. JAQU does not want to rule out (by putting in red) that an LA may be able to bring together a body of evidence that indicates an adjustment to these assumed response levels is warranted. Note: JAQU central assumptions will not be updated at this time in respect to Covid-19.	**No**	This is not considered relevant as GM models behavioural responses to charges using cost models rather than based on survey data, central government estimates or literature review of similar schemes. GM is reviewing the proposed CAZ charges in response to Consultation feedback. If any changes to the charge levels are proposed, this will be represented in the Do Something modelling, applying the same process and behavioural response assumptions as before.
Increased Stay & Pay response	LAs set these responses in their modelling based on either locally gathered surveys, central gov estimates or a literature review of similar schemes during plan development. JAQU does not want to rule out (by putting in red) that the LA is able to bring together a body of evidence that indicates an adjustment to these assumed response levels is warranted.	**Partially and as a sensitivity test**	GM's evidence does suggest that businesses may be less able to upgrade in response to the CAZ, as set out in Technical Notes CV10, 11 and 12 and discussed in Tables 7-1 and 7-2.

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Factor	JAQU commentary	To be applied in GM?	GM commentary
	JAQU central assumptions will not be updated at this time in respect to Covid-19.		As a result of the proposed alterations to normal (without scheme) fleet upgrades, there will be more non-compliant vehicles in scope for the CAZ at launch. In order to prevent the cost models predicting implausibly high change responses, a minor change to how the cost models will be applied is proposed, set out in Section 5. Beyond this proposed change, GM does not consider that there is sufficient certainty in terms of how the impact on businesses may affect their behavioural responses to the scheme to allow for changes to be made to the core scenario. It is therefore proposed that a series of sensitivity tests are carried out to reflect plausible impacts on the affordability of or ability to upgrade.
LGV/HGV change response	Trend in goods vehicle trips and GDP growth tend to mirror each other. LAs may be able to adequately source bespoke local evidence to warrant a change. Changes to this response would be inspired by local understanding of the types of businesses serviced in the CAZ area and the adaptation/ survival of those businesses post Covid. Note: JAQU central assumptions will not be updated at this time in respect to Covid-19.	**No**	GM is not proposing to change it's assumptions in terms of freight trip volumes. The proposed approach to reflecting pandemic impacts in behavioural responses is set out in Section 5.

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Table 2-5: "Red-rated" factors and GM's proposed approach to representing them

Factor	JAQU commentary	To be applied in GM?	GM commentary
Increased homeworking	Level of continued homeworking post-Covid is highly speculative	**As sensitivity test**	Unprecedented numbers of workers have been asked to work from home during the pandemic. Business surveys suggest that a sizeable minority of companies, particularly larger businesses, are planning to maintain some of the changes made post-pandemic. However, given that the recommendation for workers to work from home where possible remains in place at the time of writing, it is too early to draw conclusions as to the scale or nature of any sustained change post-pandemic. GM's analysis suggests that an increase of up to around 10% points in the number of commuters working from home on an average day is plausible and will carry out sensitivity testing accordingly.
Shopping/Leisure trips (increase due to home working and/or reduction due to online shopping)	Level of shopping and leisure trips post-Covid is highly speculative	**No**	GM does not consider that there is any clear evidence as to what the impact could be.
GDP impacts (reduced employment)	GDP performance is highly speculative	**Partially as a sensitivity test**	GDP and related traffic assumptions are derived from Government guidance and GM has taken the view that it would not be appropriate to represent possible recessionary impacts without revised national guidance. Sensitivity testing of the impact of reduced traffic will be carried out, which is one possible impact of a recession.

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Factor	JAQU commentary	To be applied in GM?	GM commentary
Impacts on public Transport / modal shift (reduction in demand / capacity/ Supply)	Short term aversion to public transport is driven primarily by the immediate threat of transmission of the virus so there is an expectation that this does not impact longer term behaviour. Model limitations used in LA plans may prevent adequate modelling of these impacts (i.e. economic impact and social distancing; change in transport mode preference due to perceived fear of virus, cost of mode, etc.).	**As sensitivity test**	Modelled bus services in the forecast year models are based on 2019 service patterns and flows and on operator specific fleet, derived from the levels recorded in TfGM's Punctuality and Reliability Monitoring Survey (PRMS) and the Greater Manchester Bus Route Mapping system. It is understood that future bus funding from central government CBSSG is to be set with the intention of maintaining existing levels of service provision. Whilst there are typically minor variations in routes and service frequencies over time, an overall trend of mileage reduction should not be anticipated or represented within the CAP. Indicative sensitivity tests of reduced bus mileage have been carried out and can be repeated if considered necessary.
Change in car ownership assumptions	We do not support inclusion of changes of these factors in central scenario modelling. These factors are highly speculative (based on long term behaviours & GDP, as well as international factors). Subcategory/consequence of GDP - wider economic, employment forecasting would need to be taken into account. Driven by length and depth of long/short term recession. Also dependent on price of oil/level of subsidy.	**No**	GM does not consider that changes in car ownership as a result of the pandemic are sufficiently likely to be represented in the modelling.

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Factor	JAQU commentary	To be applied in GM?	GM commentary
Changes to vehicle purchase costs / pricing (fare)	Speculative (long term behaviours & GDP). Subcategory/consequence of GDP - wider economic, employment forecasting would need to be taken into account. Dependent on price of oil/level of subsidy/fare.	**As sensitivity test**	GM is concerned that it is possible that constraints on the availability of compliant vehicles may lead to price increases in some markets – this was a source of uncertainty pre-Covid, given the number of similar schemes being implemented across the country, and may be exacerbated by the pandemic given evidence that production of new vehicles was lower than expected in 2020. In particular, GM is concerned about media reports of increases in the price of second-hand vans. There is currently no robust evidence on which to base any changes to the core scenario however. GM will continue to monitor the situation, and will carry out sensitivity testing on the impact of price increases on behavioural responses.

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3 Approach to modelling a 2022 start date

3.1 Background

3.1.1 The modelling tools developed to support the assessment of the Option for Consultation were based on three forecast year models representing the impacts of the introduction of GM CAP in 2021, 2023, and 2025. At the time of preparation, the proposed opening date of GM CAP was 2021.

3.1.2 Following recent updates to the project, the opening year of the scheme has now changed to 2022. To reflect this, further consideration has been undertaken on how this change will be reflected within the modelling suite.

3.2 Representing a 2022 start date in the Cost Response models

3.2.1 To reflect a 2022 forecast year, the Cost Response Models will be updated to reflect a 2022 opening year scenario. This will reflect a number of updates to the model inputs & assumptions. In particular, this will comprise:

- Do minimum fleet profiles to be updated to reflect a 2022 modelled year;
- 2022 specific input assumptions to be updated to reflect the change in forecast year; and
- The cost model will then forecast a 2022 with GM CAP behavioural responses based on the 2022 input parameters, which would then be applied in the Demand Sifting Tool.

3.2.2 The Cost Response Models also provide inputs to several other CAP calculations and will generate 2022 forecasts for the following:

- Fund uptake assumptions;
- Inputs to the Vehicle Finance model;
- CAZ operating costs; and
- CAZ revenues.

3.3 Representing a 2022 start date in the Demand Sifting Tool

3.3.1 The Demand Sifting Tool (DST) provides the linkage between the Cost Response models and the highway modelling (GM SATURN) and forms a key part of the modelling suite which assess the impacts on air quality of the GM CAP. The tool brings together the do minimum traffic demand (split by compliant and non-compliant vehicles) and applies the forecast behavioural responses from the Cost Response Models to generate the forecast with GMCAP demand, accounting for the impacts of both CAZ and Funds.

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3.3.2 As the air quality modelling is not proposing to develop bespoke 2022 forecasts, an interpolation process will be prepared, to understand the impacts on air quality. This will include preparing a 2021 and 2023 forecast model run with 2022 GM CAP assumptions, using interpolation processes to forecast the intermediate year estimates for air quality.

3.3.3 For the DST, this will include model runs using 2021 and 2023 versions of the model, with the 2022 GM CAP scheme assumptions. These will generate 2021 and 2023 with CAP demand forecasts for application in the GM highway model.

3.4 Representing a 2022 start date in the air quality modelling

3.4.1 Using the relevant scenarios which allow consistent inclusion of relevant charges by vehicle type, the outputs from the DST will be put through the highway, emissions and air quality modelling process. The air quality concentrations for the 2022 scenarios will be derived using linear interpolation between the NO_2 outputs of the 2021 and 2023 scenarios.

3.4.2 This process will generate 2022 forecasts to support the following:

- Provision of a monitoring baseline;
- Calculation of emissions benefits for economic appraisal;
- Calculation of fleet upgrade costs and savings for the economic appraisal;
- Estimate of Do Minimum exceedances;
- Estimate of compliance by site; and
- Estimate of human exposure benefits.

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4 Rationale and evidence for proposed changes to fleet upgrade delay impacts

4.1 Background

4.1.1 Sales of new cleaner vehicles lead to a natural turnover of on-road fleet, as the replaced vehicles pass onto the second-hand market, with the oldest most polluting vehicles gradually cycled out of the fleet. It is this effect which reduces overall road transport emissions as the fleet becomes cleaner leading to projected future improvements in NO_2, and it is this trend which the CAP seeks to accelerate by making older more polluting vehicles less financially attractive compared with cleaner models.

4.1.2 Covid 19 has led to a substantial reduction in new vehicle sales in 2020, which have continued into 2021 for private cars and taxis. Therefore, the predicted age of the fleet in the core scenario used for the Consultation Option modelling forecasts may now be optimistic, as lower sales reduce the rate of vehicle upgrades and also impacts on the second-hand market. Indicative testing of this effect is described in Notes CV1 and CV4.

4.1.3 It is also recognised that the vehicle sales have been impacted to differing extents by vehicle type and fuel, with commercial vehicle sales having been more resilient than those for the private car and taxi market.

4.1.4 The age of the fleet affects the CAP modelling process both at the Demand Model and Cost Model stages, because the number of vehicles and age profile within the non-compliant/compliant categories is impacted, and then in the assumptions used for the EMIGMA emissions calculations.

4.1.5 Indicative sensitivity testing of a range of potential Covid 19 impacts has been undertaken, based on JAQU guidance. This indicated that the impacts of slowed fleet upgrade is the effect of Covid 19 most likely lead to significant changes to NO_2 concentrations of the suite of tests.

4.2 Buses

4.2.1 As a result of the engagement with bus operators undertaken throughout the development of the GM CAP, operators have been aware of, and preparing for, the CAP for some time. Government funding for retrofit of appropriate vehicles has been secured, and operators have made successful applications for these funds. Bus operators are already responding to the CAZ and so it is not considered likely that the bus fleet will renew more slowly than expected in the Do Minimum scenario. Additionally, there are a number of routes where electric buses are newly operating which were not captured in the Consultation Option modelling, and these will be captured within the updated modelling process.

4.2.2 With the CAP in operation, it is assumed that all non-compliant bus fleet will become Euro VI compliant vehicles, and there is no reason to alter this assumption.

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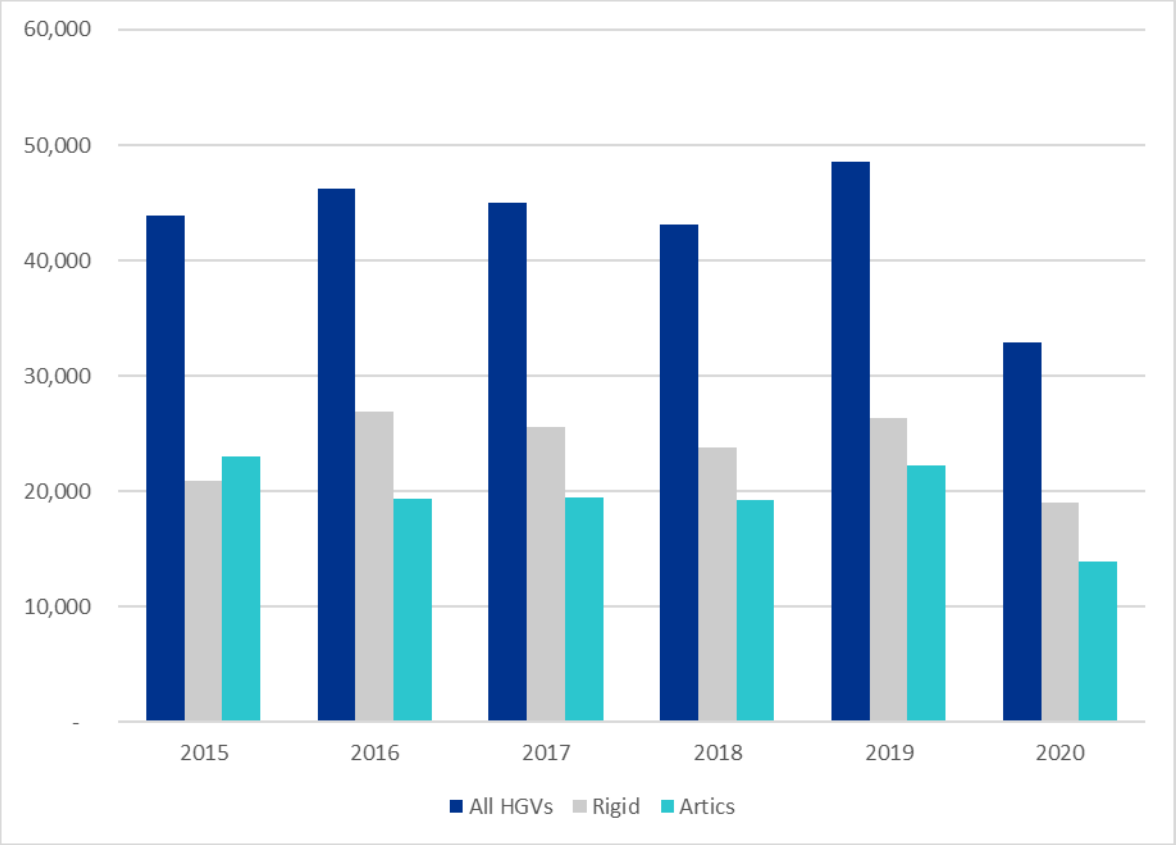
4.2.3 GM is not therefore proposing to apply any delay to the business-as-usual fleet upgrade for buses as a result of Covid 19.

4.3 HGVs

4.3.1 A review of HGV sales shows that whilst there has been a reduction in 2020, this was in part a consequence of increased atypical sales in 2019 due to regulatory changes coming the following year, as shown in Figure 4-1. This effect would be expected to impact 2020 sales before the impacts of Covid 19.

4.3.2 Total 2019/20 sales, which account for a 2-year structural sales shift altering investment cycles, fall within 1% of pre-existing 2016-2018 trends.

Figure 4-1 Annual HGV Registrations 2015-2020



Source: https://www.smmt.co.uk/vehicle-data/heavy-goods-vehicle-registrations/

4.3.3 Additionally, analysis of traffic count data for HGVs from March 2020 onwards indicates that these vehicles were less impacted than cars and vans, with movements returning to pre-Covid levels by late summer 2020. This would also suggest that the HGV market has been less severely impacted than cars and vans, although it is recognised that distribution patterns within different industry or commodity sectors may have varied.

4.3.4 It is therefore not proposed that fleet renewal projection rates for HGVs are altered from those used in the Consultation Option scenarios methodology.

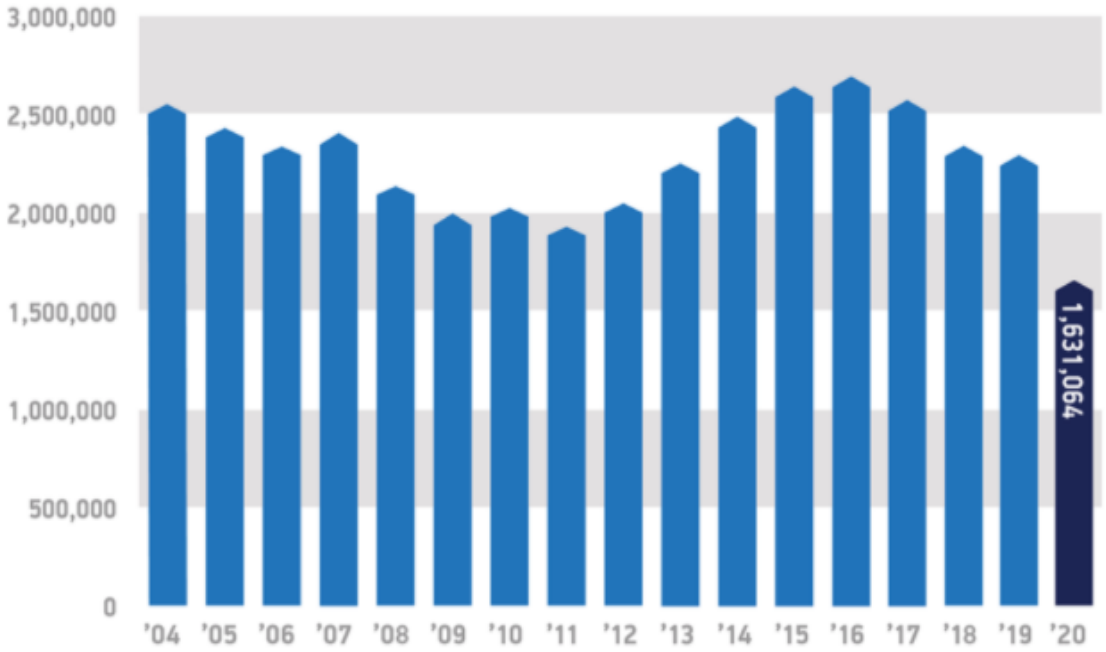
4.4 Private cars and vans

4.4.1 Evidence of reduced vehicle sales since March 2020 is available on a monthly basis[2], and projections of sales recovery have been published recently by the SMMT[3] for cars and light commercial vehicles in 2021/22, along with patterns in the second hand used car market. These will be used to calculate the number of cumulative lost sales between 2020 and the forecast years of 2021, 2023 and 2025 by vehicle type, which can be applied to the roll-over model used for vehicle fleet projection.

4.4.2 The SMMT projections suggest a rate of recovery of vehicle sales that in 2021/22 leads to lower annual sales than in the years preceding Covid 19. For the GM CAP 2023 and 2025 forecast model years, these SMMT sales projection trends will be extrapolated, and the rate of projected recovery will at some point lead to sales above those recorded pre-Covid.

4.4.3 Further analysis of the pre-Covid sales patterns for private cars, shows that sales have been falling year-on-year since 2016 (Figure 4-2). It is therefore not considered reasonable that vehicles sales per year should be forecast to exceed those in the pre-Covid reference level.

Figure 4-2 Annual Car Registrations 2004-2020

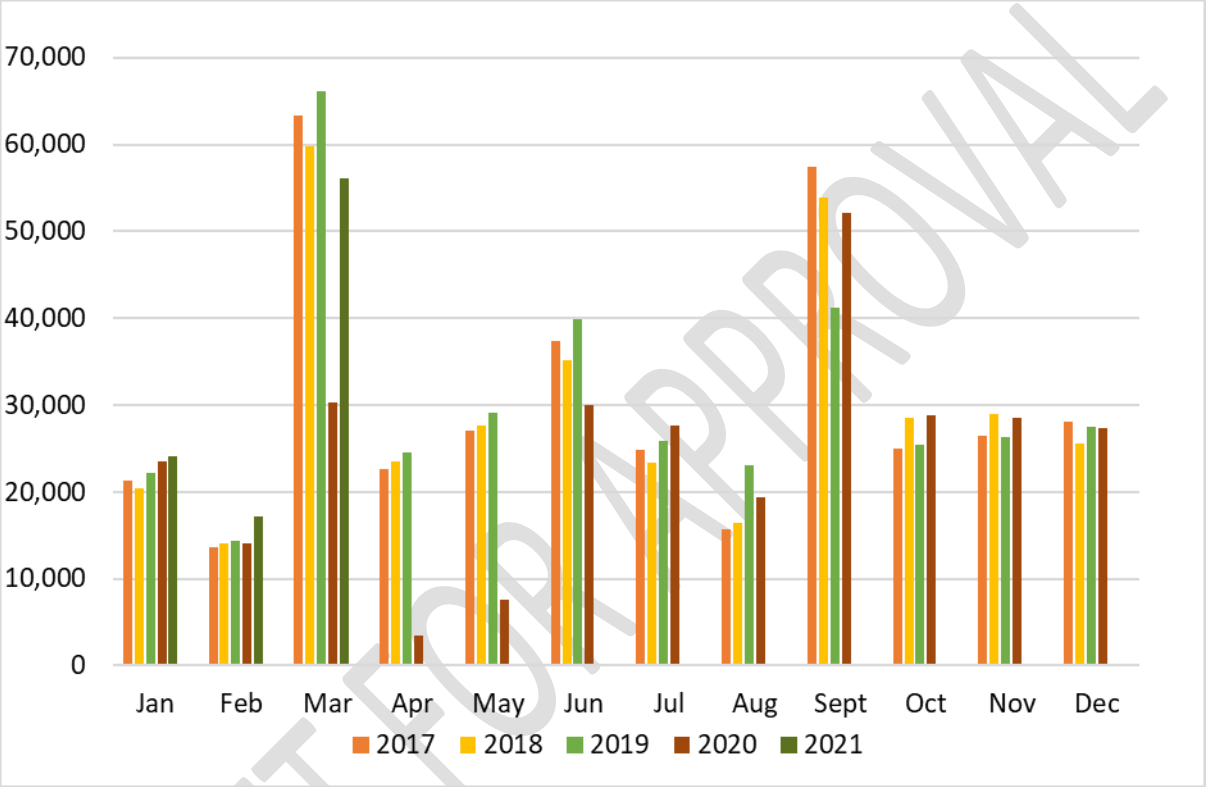


Source: https://www.smmt.co.uk/vehicle-data/car-registrations/

[2] https://www.smmt.co.uk/vehicle-data/
[3] https://www.smmt.co.uk/wp-content/uploads/sites/2/WEBSUM-SMMT-CARLCV-MARKET-OUTLOOK-Q1-REVISED-03032021.pdf

4.4.4 Sales of vans have been stable since 2016, and were more resilient during the pandemic after the initial national lockdown. Furthermore, sales in January and February 2021 were greater than those recorded historically indicating strong market demand and that supply of new vehicles isn't unduly restricted at this stage (Figure 4-3). It is therefore considered reasonable that vehicles sales per year could be forecast to exceed those in the pre-Covid reference level.

Figure 4-3 Monthly Van Registrations 2017-2021



Source: https://www.smmt.co.uk/vehicle-data/lcv-registrations/

4.4.5 Using these vehicle sales data sources and SMMT sale predictions, the following approach to incorporating the impacts of Covid 19 into the modelling is proposed, as set out in Table 4-1. The typical pre-Covid sales have been set at those recorded in 2019.

4.4.6 The SMMT predictions for 2021/22 have then been extrapolated forward to 2025. The difference between the predicted annual sales (or actual for 2020) than typical pre-Covid levels have been summed cumulatively, and are reported as the equivalent of typical sales each year.

4.4.7 Because car sales are limited to the pre-Covid level of 1,945,000 vehicles, the rate of lost vehicle sales is equivalent to 62% (or approx.7 months) of a year's worth of renewal from 2023 onwards. For vans, where sales have been more resilient, the rate of lost vehicle sales is equivalent to 28% of a year's worth of renewal in 2023, reducing to 7% in 2025, because sales have been extrapolated to levels above those in 2019.

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4.4.8 These lost renewal rates will then be applied into the fleet roll over model, for each year, creating a slightly older fleet profile for use in the behavioural response and emissions modelling.

Table 4-1 Predicted Car and Van Fleet Renewal Delays

Data Source	Year	**Cars sold**	Lost sales/ yr [1]	Cumul -ative lost sales	Lost % of annual sales		**Vans sold**	Lost sales/ yr [2]	Cumul -ative lost sales	Lost % of annual sales
Actual	2016	2317					376			
Actual	2017	2179					362			
Actual	2018	2010					357			
Actual	2019	1945	typical sales per yr				366	typical sales per yr		
Actual (during pandemic)	2020	1338	-607	-607	**-31%**		293	-73	-73	**-20%**
SMMT prediction	*2021*	*1543*	-402	-1009	**-52%**		*344*	-22	-95	**-26%**
SMMT prediction	*2022*	*1777*	-168	-1177	**-61%**		*353*	-13	-108	**-30%**
SMMT extrapolation	*2023*	*1923*	-22	-1199	**-62%**		*373*	7	-101	**-28%**
SMMT extrapolation	*2024*	*1945*	0	-1199	**-62%**		*393*	27	-74	**-20%**
SMMT extrapolation	*2025*	*1945*	0	-1199	**-62%**		*413*	47	-27	**-7%**

1. Limit to typical 2019 sales level
2. Allow SMMT extrapolated recovery, above typical historical rate of sale

4.4.9 Separately, there are a range of confounding factors which affect how emissions would be altered, since the way that new vehicles are used on the road is not necessarily linearly-related to sales themselves. For example, generally newer vehicles drive more miles per annum than older vehicles, as do vehicles purchased for primarily business use rather than private use. Range anxiety concerns with battery-electric vehicles (BEV) also mean that are often purchased as second cars or for shorter local trips. These effects cannot be quantified or represented in the modelling process.

4.4.10 The current split between diesel, petrol and electric car mileage for each forecast year is based on projections from the Department for Transport, which have been updated in the Consultation Option. The trend in a switch from diesel cars towards petrol and electric powered vehicles is represented in this modelling process following JAQU guidance, and assumptions will be reviewed against available evidence. However, whilst the reduction in new and used vehicle sales is related to the impacts of Covid 19, the influence of Covid 19 altering projected rates of fuel switch is not clear or at this stage considered a first order impact.

4.5 Hackney Carriages and Private Hire Vehicles (PHVs)

4.5.1 Taxis are considered to be one of the groups most impacted by the Covid 19 pandemic, as business and recreational trips have been curtailed by the travel restrictions imposed on GM. Analysis of sales data for Hackney Carriages indicates that the taxi sector has been heavily impacted by Covid 19, with sales significantly reduced in 2020.

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4.5.2 The GM licensing whitelists for Hackney Carriages and PHVs have been obtained for December 2020. These data show that only two compliant Hackney Carriages were registered since 23rd March 2020, and 85 PHVs, representing a reduction against pre-Covid rates in new registrations of >95% and >85%, respectively.

4.5.3 Furthermore, analysis of ANPR data for licensed GM taxis and PHVs in September 2020 indicates that these vehicles were making significantly less trips than pre-Covid movements. Further information can be found in note 'CV15 Summary data note - Monitoring traffic conditions during pandemic'.

4.5.4 Based on the GM licensing data, which represents approximately 8 months of pandemic phase, whilst the full restrictions associated with the pandemic are not expected until June 2021 at the earliest which is 1¼ years, the delay to fleet renewals for both hackney carriages and PHVs will be set at 12 months.

4.6 Coach and minibus

4.6.1 Analysis of sales data for the coach and minibus markets indicates that these sectors have been heavily impacted by Covid 19, with sales significantly reduced. However, neither of these vehicle types are explicitly modelled within the transport or air quality modelling process and therefore the impacts of delayed fleet upgrade cannot be included in the predictions of future air quality. Testing has demonstrated that these vehicles do not contribute significantly to overall vehicle emissions. However, it is recognised that coach and minibus operators will be subject to CAZ charges in practice, and these issues are being considered in relation to mitigation CAF funds. Further information can be found in note 'CV12 Covid Impacts – Coach & Minibus'.

4.7 Summary of recommendations for vehicle fleet and upgrade rates

4.7.1 A summary of recommended approaches for representing the impacts of Covid-19 on the vehicle fleet upgrades are provide by vehicle type in Table 4-2.

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Table 4-2 Recommendations of Vehicle Fleet and Upgrade Rates: assumptions by vehicle type

Vehicle Type	Change Proposed	Justification
Bus	No	Fleet mix assumptions will not be altered. Bus operators already responding to CAZ and so not considered likely that bus fleet will age more than expected. Electric bus routes will be incorporated when funding is secured or already in operation.
HGV	No	Purchases were disrupted in 2019 and 2020 by factors other than Covid. Analysis suggests that overall purchases across the two years were fairly typical of an average year.
LGV	**Yes**	Purchases were depressed in 2020, with some recovery in early 2021. Analysis suggests that **a delay of c3 months is plausible**, with the age of the fleet **gradually converging to close to the pre-Covid forecast by 2025** if sales recover over time.
Hackney Cab & PHV	**Yes**	Consider that significant impact likely – based on licensing data, propose applying **a delay of one year** to the upgrade of the Hackney & PHV fleet**, to be maintained throughout the lifetime of the plan i.e. to 2025.**
Car	**Yes**	Although not in scope for CAZ, important contributor to background emissions. Evidence suggests a significant delay in fleet upgrade and that this is likely to be maintained in future years. **Delay of c7 months proposed, to be maintained throughout the lifetime of the plan i.e. to 2025**.
Coach and Minibus	No	No changes to the transport and air quality modelling are applicable, because not directly represented in these tools.

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5 Rationale and evidence for proposed changes to behavioural responses

5.1 Introduction

5.1.1 As set out in Section 1, to support the development of the Option for Consultation for GM CAP, a series of Cost Response Models were developed by GM. These models were developed to support the understanding and forecasting of behavioural responses for how owners of non-compliant vehicles might respond to GM CAP.

5.1.2 This Section discusses the proposed changes to the Cost Response Models to reflect the changes in forecast behavioural responses forecast for GMCAP, considering the increased vulnerabilities imposed on the project due to the Covid 19 global pandemic. The sections below provide:

- Background on the Cost Response Models and overview of the approach in developing the Option for Consultation;
- Identifies proposed changes to the core modelling assumptions in response to the pandemic; and
- Identifies further sensitivity testing in relation to further changes in behavioural response that may be expected as a result of the pandemic.

5.2 Background to the Cost Response Models

5.2.1 Following the submission of the OBC, Cost Response Models were developed to provide a greater understanding in the ways that non-compliant vehicle owners could likely respond to GM CAP. These models form the first part of GM's modelling suite for assessing the air quality impacts of the GM CAP.

5.2.2 The cost models incorporate the following vehicle modes:

- Heavy Goods Vehicles;
- Vans (Light Goods Vehicles);
- Hackney Carriages; and
- Private Hire Vehicles (PHVs).

5.2.3 These modes forecast a range of response to GM CAP, most notably:

- Upgrade;
- Do Nothing (stay & Pay);
- Change mode; and
- Change business model / leave sector.

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5.2.4 The responses forecast by the cost models inform the change in demand forecast for GM CAP through the prediction of changes in the mix of compliant and non-complaint vehicles, which are applied in the Demand Sifting Tool and through the GM modelling suite to assess the air quality impacts.

5.3 Proposed revision to core modelling of behavioural responses

5.3.1 As set out in Section 4, for some vehicle types, the natural turnover/upgrade of vehicles has been delayed due to Covid 19. This means that for some vehicle types, there will be more non-compliant vehicles when the CAZ is introduced than previously forecast.

5.3.2 In effect, the cost models assume that commercial vehicle owners will take the best value option, upgrading where it makes financial sense to do so. The cost models do not place any constraints or financial barriers to prevent non-compliant vehicle owners to upgrade where it makes financial sense to do so. However, GM recognises that as a result of the pandemic, vehicle owners may not be in a position to upgrade even where it would make financial sense to do so, due to have used up savings/reserves, greater indebtedness and so on.

5.3.3 As discussed in Table 2-4, GM does not consider that there is sufficient certainty in terms of how the impact on businesses may affect their behavioural responses to the scheme to allow for changes to be made to the core scenario. It is therefore proposed that a series of sensitivity tests are carried out to reflect plausible impacts on the affordability of, or ability to, upgrade. These are likely to include:

- Upgrade becomes less affordable – represented in the cost models through increases in the cost of upgrade and decreases in the residual value of existing vehicles; and
- Access to finance is restricted – represented in the cost models by a proportion of vehicle owners being blocked from upgrading, based on evidence from GM's vehicle finance panel in terms of the proportion of vehicle owners expected to be declined for credit.

5.3.4 However, beyond this, GM has identified an issue resulting in a proposed change. Applying a delay to the natural upgrade of vehicle fleets for vans and taxis within the modelling means that more non-compliant vehicles are in scope for the CAZ. Because the model assumes that vehicle owners will upgrade if it is cost effective to do so, where planned (and therefore cost effective) upgrades have been delayed, the model will judge it as being in the interests of the vehicle owner to upgrade to a compliant vehicle. This seems implausibly optimistic – it is unlikely that all those vehicle owners who have delayed a planned upgrade as a result of the pandemic will then be in a position to upgrade in response to the CAZ.

5.3.5 Table 5-1 sets out the options that have been considered in terms of how to handle the impacts of the delay to fleet upgrade within the cost models.

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Table 5-1 Consideration of options for the treatment of delayed fleet upgrades within the cost models

Option	Impact	Narrative
A: Cost models applied without further intervention	% upgrade response increased compared to Option for Consultation[4]	**Discounted.** Considered implausible that more people would upgrade as a result of the CAP in a post-Covid scenario than a pre-Covid scenario.
B: Upgrade responses calculated for pre-pandemic fleet and applied as a % to post-pandemic fleet	% upgrade response same as Option for Consultation	**Discounted.** Although this is less optimistic than Option A, it still in practice applies an assumption that the vast majority of those who delayed their vehicle upgrade as a result of the pandemic will upgrade in response to the CAP. This is considered overly optimistic.
C: Cost models applied to pre-Covid fleet only – non-compliant vehicles are allowed to respond as predicted by the cost model. Additional non-compliant vehicles resulting from delayed fleet upgrades are not given the opportunity to upgrade as a result of CAP.	Number of vehicles upgrading as a result as CAP as per Option for Consultation but % upgrade response decreased compared to Option for Consultation. In total, more vehicles remain non-compliant with CAP post-Covid.	**Recommended.** This is considered a conservative estimate, reflecting the ongoing impact of the pandemic on the ability of businesses to undertake capital investment. It is the only option which does not lead to a more optimistic representation of the impact of the GM CAP post-pandemic than pre-pandemic.

5.3.6 Following the review of the options identified above, GM proposes that Option C is included within the updates to the modelling. Option C accounts for the delayed fleet upgrade discussed above, and does not allow for an over-optimistic resolution of that delay within the cost models. Although in practice it is likely that some of those vehicle owners previously planning to upgrade their vehicle do in fact do so as a result of the CAP, this may be offset against those forecast to upgrade but no longer in a position to do so. It is not possible to quantify the scale of either of these groups, and therefore GM considers that taking this most conservative approach is in line with JAQU's guidance that "given the considerable uncertainty we must accept that there is a risk of putting in place clean air measures that overachieve, however, this is preferable to inaction which leads to poor air quality".

[4] Note that in practice the Option for Consultation will be replaced by the post-Consultation option. Any changes to the proposed charges, discounts and exemptions or funds may have the effect of changing the forecast behavioural responses.

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6 Summary of Covid 19 impacts and proposed changes by element of the modelling suite

6.1.1 Table 6-1 sets out the modelling system used in the study with a discussion of its appropriateness for the project and a consideration of the Covid 19 impact.

6.1.2 It highlights where changes to the core scenario are proposed, and beyond this where Covid-related factors will be considered in sensitivity testing. A full list of proposed sensitivity tests – considering Covid and non-Covid related factors – will be supplied at a later date.

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Table 6-1: Modelling process description, discussion of appropriateness and proposed changes to the core scenario to represent Covid 19

Modelling process		Discussion as at OBC	Update as at Consultation	Proposed changes to the core scenario to represent Covid 19
1	An option sifting tool was developed in the first instance to allow measures to be tested in a quick and efficient way prior to any detailed assessments being undertaken using the highway and air quality models. This was further developed into a WebTAG-style variable demand model, named the Demand Sifting Tool, to allow the behavioural change of measures to be estimated before passing data on for further assessment using highway assignment and air quality models.	An appropriate variable demand model was not available and it would not have been possible to develop one in the time available. The demand sifting tool has been developed for the GM CAP and is considered appropriate. It relies on input data from stated preference surveys, discussed in more detail below. The demand sifting tool is an elasticity model, rather than one that represents each different behavioural response separately. It is not a full variable demand model and does not represent, for example, the impact of suppressed trips being released. As the primary response is vehicle upgrade (most relevant for a CAZ A-C) it was considered that the schemes that were being considered would not have a significant impact on highway congestion and therefore little impact on suppressed demand.	The Demand Sifting Tool approach is retained but the behavioural responses have been enhanced by the development of a series of bespoke cost response models. These models reflect the local characteristics of the LGV, HGV, Hackney Cab and PHV fleets in GM. The cost response models include additional choice options for LGV and HGV trips such that they can, for appropriate sectors and vehicle types, downsize (e.g. van to estate car) or consolidate to larger vehicles. Details of the development of these models has been reported to JAQU in a series of Technical Notes and the modelling approach is set out in T4. A Demand Sifting Tool Manual has been produced.	Versions of the Demand Sifting Tool and cost models will be developed to represent 2022. Delays to normal fleet upgrade will be applied as set out in section 4. It is considered that the approach applied in the Demand Sifting Tool remains appropriate and no changes will be made to the core scenario. It is considered that the approach applied in the cost response models remains largely appropriate, with a minor change proposed to the way the cost models are applied, to prevent them over-forecasting an upgrade response to the CAZ where 'natural' fleet upgrade has been delayed by the pandemic. This is set out in section 5. No further changes will be made to the core scenario in the cost models.

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Modelling process		Discussion as at OBC	Update as at Consultation	Proposed changes to the core scenario to represent Covid 19
2	The highway assignment model (Saturn), which is used to provide details of traffic flows and speeds for input to the emissions model and forecasts of travel times, distances and flows for input to the economic appraisal	The GM CAP uses the do-minimum model developed for the appraisal of the planned extension of the Greater Manchester traffic model. This model was considered to be the most appropriate given its base year of 2013, (which was close to the 2016 base year required for the CAP project), and its forecast year of 2020, which was close to the opening year for the CAP proposal. TfGM's county-wide SATURN model is a well-established tool used for the assessment of numerous major schemes. The traffic model validates well at a county level in terms of its link flow validation, although the journey time validation suggests that the modelled speeds in the peak hours tend to be too high on strategic links. Tests have been carried out to investigate how errors in the journey time validation might impact on modelled road traffic emissions for 2016 by applying adjustment factors to the modelled link speeds (at an aggregate level) to give a closer fit between the modelled and observed speeds across the County-as-a-whole. The results of these tests indicated that there was relatively little impact on the calculated emissions. Further details are available in the T2 report.	The highway modelling approach is unchanged but there have been updates to reflect: ▪ Latest information on bus services and fleet operating within GM; and ▪ ppm / ppk values derived from the latest version of the TAG Databook. Detailed analysis has been conducted of traffic composition, speeds and congestion at those locations identified as non-compliant in 2023 in Option 7 as tested at OBC ie: a GM-wide CAZ B scenario plus additional measures. These were selected as the sites most likely to determine the year of compliance, and where further additional measures could potentially act to bring forward the year of compliance. As a result of this analysis, alongside a wider assessment of conditions at the locations, some revisions have been made to model inputs to better reflect real-world conditions. In those locations found to have significant exceedances, an exercise has been undertaken to identify potential traffic management and other relevant solutions.	GM has reviewed the assumptions underpinning the highway assignment modelling including bus services/fleet, traffic volumes and composition and future schemes. Since the previous review of bus services, a fleet of zero emission buses has been deployed on routes in the city centre. The highway model will be updated to reflect these new buses. A test of the Consultation Option model, excluding the Full WGIS and M60 Jn 24-27 and Jn 1-4 smart motorway schemes (those elements of the WGIS scheme that have been built will be included) will be undertaken as a sensitivity test but changes will not be applied in the core scenario. No further changes will be made to the core scenario in the highway assignment model.

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Modelling process		Discussion as at OBC	Update as at Consultation	Proposed changes to the core scenario to represent Covid 19
3	The emissions model, which uses TfGM's EMIGMA (Emissions Inventory for Greater Manchester) software to combine information about traffic flows and speeds form the highway model with road traffic emission factors and fleet composition data from DEFRA's EFT to provide estimates of annual mass emissions for a range of pollutants including oxides of nitrogen (NOx), nitrogen dioxide (NO_2) particulate matter (PM_{10} and $PM_{2.5}$) and CO_2.	The EMIGMA tool uses DEFRA's EFT v8.0 tool to calculate vehicle emissions and is considered best practice and appropriate. It draws on appropriate and relevant national and local data sources. The EFT uses data from the Copert modelling which, whilst appropriate for steady state conditions can be less reliable in congested or queuing conditions.	The latest version of DEFRA's EFT tool (version 9.1a) has now been incorporated into the modelling process. This updates the vehicle fleet mix particularly for the diesel/petrol fuel splits for passenger cars, to reflect more recent sales trends away from diesel. This does not alter the base year or air quality verification, but does alter future year Do Minimum and with-action modelling results.	Delays to normal fleet upgrade will be reflected in the calculation of emissions as set out in section 4. It is not considered that any technical changes are required to the emissions modelling process as a result of the Covid 19 pandemic.

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Modelling process		Discussion as at OBC	Update as at Consultation	Proposed changes to the core scenario to represent Covid 19
4	The AQ modelling process, which uses ADMS-Urban software to combine information about mass emissions of pollution (from EMIGMA) and other data such as wind speed and direction, topography plus background datasets and atmospheric chemical reactions to predict total ambient pollutant concentrations.	The emission rates for each modelled scenario in EFT have been input into ADMS-Urban air quality dispersion model (v4.0.1.0), along with hourly meteorological data from Manchester Airport meteorological station for 2016. The meteorological hourly data set includes all key parameters such as wind speed, direction, temperature etc. This is considered an appropriate tool as applied. The outputs of the AQ modelling were verified against NO_2 monitoring data, which was located in relevant locations across Greater Manchester. This process is described further in AQ3. GM already has an extensive monitoring network of continuous monitors supplemented by diffusion tubes. However, not all of the PCM links are covered directly by the existing monitoring locations. Therefore, additional diffusion tube monitoring is being undertaken.	No change to the dispersion modelling process or verification has been applied from the OBC process.	It is not considered that any changes are required to the AQ modelling process as a result of the Covid 19 pandemic.

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7 Consideration of the impacts of Covid 19 on uncertainty in the GM CAP modelling process

7.1 Sources of uncertainty in modelling the challenge

7.1.1 Table 7-1 sets out the possible impacts of the Covid 19 pandemic on sources of uncertainty in the modelling of the challenge as identified in the Analytical Assurance Statement (January 2020). This shows that there is greater uncertainty as a result of the pandemic, with some aspects likely to worsen air quality, and others potentially providing air quality improvements. Overall, it is very unlikely that any improvements to air quality would be of a sufficient scale to mean that action was no longer required.

7.1.2 Monitoring will be required to ensure that the policy and proposals contained in the GM CAP remain appropriate throughout the lifetime of the interventions. Monitoring will also be required where uncertainty remains as to post-pandemic conditions, for example in terms of vehicle fleets, travel patterns and the provision of bus services.

7.2 Sources of uncertainty in modelling the impacts of the CAZ

7.2.1 Table 7-2 sets out the possible impacts of the Covid 19 pandemic on sources of uncertainty in the modelling of the Clean Air Zone as identified in the Analytical Assurance Statement (January 2020).

7.2.2 At the time of writing, in April 2021, the UK is still operating under pandemic-related restrictions on activity and travel. It is therefore too early to say with certainty what the impacts of Covid 19 will be post-pandemic on behaviour, travel patterns, businesses and the economy. In order to achieve compliance in the shortest possible time, GM needs to progress the modelling underpinning the GM CAP based on a set of reasonable assumptions about the medium-to-long term impacts of the pandemic. Where uncertainty remains, monitoring will allow GM to apply an ‘adaptive planning’ led approach to the delivery of the GM CAP, to ensure the Plan remains appropriate and effective.

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Table 7-1: Sources of uncertainty in the modelling of the challenge

Source of uncertainty	OBC Discussion	Update as at Consultation	Consideration of Covid 19 impact
Vehicle purchasing / ownership patterns and trends	The projected fleet mix for buses and other road traffic in the forecast year is estimated, based on an assumption that the age profile of the vehicle fleet remains unchanged over time. ANPR data has revealed that the Greater Manchester fleet is older than the national average. There is some emerging national evidence of slowing new vehicle sales and of a shift from diesel to petrol in new car purchases. Sensitivity testing suggests that a slower change in the fleet age over time could result in mass NOx emissions for 2023 that are approximately 25% greater than the reference case. Monitoring of the fleet profile will be required. New ANPR survey data from 2019 will assist in determining the projection rate used between 2016 to 2021/23.	Additional ANPR data has been collected to improve the evidence base with regard to the fleet age profile, and temporal projection. Research has been undertaken into the vehicle renewal patterns of different market sectors and this has been incorporated into the LGV and HGV cost models, providing a more informed position on the likely behavioural responses to the CAAP. GM has applied EFT v9.1a, which has primarily affected the split of petrol and diesel cars, increasing the petrol and EV/hybrid fleet in line with more recent sales trends and again reducing uncertainty in terms of the accuracy of car emissions.	The Do Minimum fleet mix assumes a normal pattern of vehicle upgrades, including the purchase of new vehicles, trading of second-hand vehicles and the scrapping of the oldest vehicles from the fleet. The impacts of the Covid 19 pandemic include: • Reduction in the number of new vehicles manufactured due to lockdowns; • Delay in transactions due to lockdown constraints; • Reduction in vehicle upgrades due to direct economic impact of lockdown or wider recessionary impacts, or because vehicles are not being used as heavily as before; and therefore • The oldest vehicles remaining in the fleet for longer. Analysis shows that these impacts vary between different vehicle types and business sectors with some more affected than others. Sensitivity testing of an older-than-expected fleet has been carried out and it is proposed that some adjustments are made to the car, van and taxi fleets to reflect the emerging evidence that the normal pattern of vehicle upgrades has been affected for those fleets, set out in Section 4.

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Source of uncertainty	OBC Discussion	Update as at Consultation	Consideration of Covid 19 impact
Trends in background emissions	Background emissions are based on the DEFRA background emissions maps 2015. Comparison of this with local background measurements suggests that the DEFRA maps are lower than monitored values. Background emissions are higher than average in parts of Greater Manchester, accounting for 25 µg/m3 at some non-compliant sites, after removal of the transport sector, in 2021. GM assumes that DEFRA will keep abreast of trends in background emissions. GM will apply any new guidance as it emerges where possible.	The Defra background maps were updated to a 2017 base year, however these are not consistent with the projections used in EFT 9.1a. Additionally, a 2016 dataset was not provided so the latest 2017 based maps cannot be used in the GM modelling which has a 2016 Base Year. This issue was flagged to JAQU before the mapping was released. Background concentrations vary each year for many environmental factors, so assumptions based on the Base Year are subject to projection uncertainty, which cannot readily be addressed without altering assumptions that affect the Base Year verification and Target Determination results.	It is not considered likely that Covid 19 would have a significant impact on background emissions.
Traffic growth trends	The SATURN model forecasts traffic growth of around 12% between 2016 and 2025, reflecting population and economic growth. Current trends suggest traffic is not growing at this rate and therefore sensitivity testing of a low traffic growth scenario has been carried out.	Note that a correction has been applied in the revised Do Minimum modelling ensuring that van growth is correctly represented.	The initial lockdown phase had a very significant but temporary impact on traffic, with traffic volumes returning closer to normal during 2020 - albeit with different demand patterns in terms of geography, time of day, day of week etc - and later lockdowns having much less impact on traffic volumes. In the longer term, it remains possible that the Covid 19 pandemic could affect traffic growth in any of the following ways:

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Source of uncertainty	OBC Discussion	Update as at Consultation	Consideration of Covid 19 impact
	Sensitivity testing suggested that a plausible low growth scenario resulted in relatively small reductions in vehicle kms and NOx emissions of about 6% relative to the do-minimum scenario.		• Reduction in traffic or a loss of growth due to a recessionary impact; • Reduction in traffic in peak periods due to sustained behavioural changes such as more working from home; • Increase in the car mode share due to restrictions on public transport use, or people being deterred from public transport by fear of infection; and/or • Increase in freight traffic (especially LGV) due to sustained behavioural changes such as increased internet shopping. As pandemic-related travel restrictions remain in place at time of writing, it is not possible to assess with any certainty the likelihood, scale or nature of any such changes. As per the JAQU guidance, GM does not propose to reflect any possible travel behaviour or traffic changes in the core scenario. Sensitivity testing of the impact of increased working from home and reduced traffic will be carried out. Monitoring of traffic patterns, public transport passenger data and survey data about behavioural choices will demonstrate whether any changes are sustained post-pandemic.
Fuel costs and other wider changes in costs/travel time	Traffic modelling assumes fuel costs as recommended by TAG. In theory, if fuel costs or other similar costs were to change in future, it could have an impact on vehicle purchasing choices and on kilometres travelled.	No change	Unlikely to be a material impact and CAP is relatively insensitive to change in this aspect. GM is not proposing any sensitivity testing of changes to fuel or travel time costs.

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Source of uncertainty	OBC Discussion	Update as at Consultation	Consideration of Covid 19 impact
	Sensitivity testing of the GM CAP has demonstrated that the conclusions are not sensitive to fuel costs.		
Effectiveness of future emissions standards	It is assumed that future emissions standards perform as planned. The performance of earlier emissions standards against forecasts has been variable. This is a known source of uncertainty that cannot meaningfully be mitigated at a local level.	No change	Not affected by Covid 19.
Assumptions about real-world emissions	Emissions rates have been based on the EFT version 8.0. The emissions rates of vehicles in the real world may differ from those modelled. The analysis in the base year is calibrated to real data and so this is internalised into the analysis. However, this cannot be adequately weighted to differing vehicle types/ages/fuel types which affects future year assumptions as the fleet renews over time. This is a known source of uncertainty that cannot meaningfully be mitigated at a local level.	This is not altered from OBC position, because EFT 9.1a is also based on Copert.	Not affected by Covid 19.

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Source of uncertainty	OBC Discussion	Update as at Consultation	Consideration of Covid 19 impact
Assumptions about the impact of urban canyons	Greater Manchester is a complex urban environment. Overall, it is considered likely that there is considerable variation of modelled concentrations in central Manchester due to the presence of canyons. The assessment has applied a recognised best practice approach to representing model predictions in the vicinity of canyons. It is also noted that the highly variable and complex nature of modelling this type of environment is not readily compatible with the overall approach of the EU Air Quality Directive, which indicates model outputs should be representative of relatively long stretches of road, not affected by changes to traffic flow or junctions. Canyons are a similar effect resulting in spatial discrepancy in NO_2 concentrations. JAQU guidance recognises this issue and recommends additional Scheme Evaluation Monitoring is implemented in canyon locations, but not that this should be done to inform the Target Determination process / Options Appraisal of OBC which	The approach to modelling canyons followed best practice, both in the application of the canyons module, with a canyons file produced for GM by CERC (the ADMS model developer), but by applying a separate AQ model verification zone around the IRR area where the canyons module was used explicitly. However, even with this approach the uncertainty in predictions is highly sensitive to the local effects of canyons, and several of the last locations to comply are found inside the IRR area. Additional air quality monitoring has been deployed in July 2019, and further monitoring will be needed to meet the requirement of the Monitoring and Evaluation project, and guidance issued by JAQU in 2019. These sites included many in the canyon locations where exceedances had been predicted in the AQ modelling. Sufficient data is not yet available to draw meaningful conclusions on annual mean NO_2 concentrations.	Not affected by Covid 19.

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Source of uncertainty	OBC Discussion	Update as at Consultation	Consideration of Covid 19 impact
	would like to delay the programme by 6-12 months.		
Gradients and Topography	The effects of gradients have not been able to be incorporated in the timescales. The locations of significant gradients were reviewed and it is considered that this would have only a limited effect on verification or key output sites. Topography of the road network is difficult to determine as the road network is not always at grade. However, the last points of compliance in the modelling are not significantly affected by gradients.	No change. Incorporation of gradient into the modelling would have required updating Target Determination, because we would have had to alter the Base year modelling and verification process. This was not considered proportionate because the last points of compliance in the modelling are not significantly affected by gradients.	Not affected by Covid 19.
Assumptions about bus service patterns and fleet profile	The highway modelling is based on 2015 bus service patterns. Bus mileage has, however, been falling in recent years and it is possible that this approach over-estimates likely future bus mileage. There is uncertainty around bus vehicle upgrade patterns. The impact of new funding to support the purchase of electric buses has not been incorporated in the analysis.	The traffic model has been updated to reflect the latest information on service patterns and fleet profiles from 2019. The GM bus market is complex with numerous operators and fleet age profiles which reflect uncertainty around the future direction for bus service provision in GM.	Covid 19 has had a very significant impact on bus operations, with public funding required to maintain services, and constraints on bus use. GM considers that it is most likely that current service patterns are broadly maintained through the lifetime of the Plan but there remains a risk that the Covid 19 pandemic results in: • A reduction in bus services; • Delays to planned fleet upgrades, so that the fleet is older than forecast; and • A reduced ability of bus operators to be able to respond to the GM CAP by upgrading their fleets.

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Source of uncertainty	OBC Discussion	Update as at Consultation	Consideration of Covid 19 impact
		Proactive engagement with the bus operators has shown a good awareness of the CAP and a willingness to improve their fleets. Uncertainty will remain however around the commercial decisions to be made until the level of potential financial support can be confirmed.	Indicative sensitivity testing of an older-than-expected fleet and the impact of a reduced bus service has been carried out. One or both of these tests may be repeated on the post-Consultation GM CAP scheme. Monitoring of bus services, on-the-road fleets and of the ongoing position of bus operators and Government subsidies will be required post-pandemic. However, there are specific services where electric buses are funded or now in full operation, and these will be incorporated to the revised modelling.
Assumptions about future growth and related schemes	The GMVDM matrices were used to calculate demand changes; these matrices included early estimates of GMSF (Greater Manchester Spatial Framework) growth, which were not available at the time that the 2021 CAP matrices were developed. It needs to be born in mind, however, that the GMSF is still open to consultation and will be subject to uncertainty. Overall traffic growth has also been constrained to NTEM forecasts.	A review will be undertaken prior to FBC submission to assess whether any approved schemes are expected to affect the topology of the road network and review the assumed networks for 2023 and 2025.	GM has carried out a review of whether Covid 19 is expected to result in the delay or cancellation of some future development schemes that affect the topology of the road network and of the assumed networks for 2023 and 2025. It is not considered that any known scheme delays will have a meaningful impact on compliance. More detail is provided in Table 2-3. Several temporary road schemes have been put in place during the pandemic. Although it is possible that they may continue, or that other schemes could be introduced which affect traffic patterns or the road network, the GM CAP team is not currently aware of any new funded and approved schemes of this nature.

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Source of uncertainty	OBC Discussion	Update as at Consultation	Consideration of Covid 19 impact
	It was decided as part of this process to also include all of the 2025 schemes in the 2023 networks, to ensure that both networks were topologically the same. This approach was adopted to avoid having to update the road width and street canyon files that had been developed for use with the 2025 dispersion model, which would have been time-consuming and could have delayed the project.		
Other assumptions about road network and weather conditions affecting air quality forecasting	The GM region is a very large study area, with a diverse range of topography and surface features. Additionally, road transport fleet age may vary depending on the nature of road type or function. This area has necessarily been modelled as a homogenous area in ADMS.	No change	Not affected by Covid 19.

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Table 7-2: Sources of uncertainty in modelling a Greater Manchester Clean Air Zone

Source of uncertainty	OBC Discussion	Update as at Consultation	Consideration of the impacts of Covid 19
Vehicle purchasing/ ownership patterns and trends	A series of assumptions have been made about upgrade choices and costs, for example that drivers would not choose to downgrade their vehicle as a result of the GM CAP. If further evidence becomes available that challenges these assumptions, the number of vehicles in-scope could potentially be altered, and the base level altered. However, this would be relatively consistent between scheme options and thus would be unlikely to affect the decision to proceed with Option 8. In behavioural response terms, the primary impact is on the costs and benefits of the proposals, and on the mitigating measures that may be required.	The cost models developed for LGV and HGV allow for drivers to downgrade (LGV to estate car, HGV to LGV etc.) where appropriate based on a consideration of the market sector they operate in. The cost model developed for Taxi / PHV includes the functionality to allow downgrade from Hackney operation but this has not been implemented. Further detailed research would be required into the commercial operation of this sector to enable a robust assessment. It is currently assumed that the choice to operate a Hackney (rather than PHV) would not be impacted by the CAP as the charge would apply equally to both modes. Further work has been done to substantiate the cost assumptions being used for upgraded vehicles and for the feasibility, availability and cost of retrofit. In addition, comparing the original and new ANPR surveys conducted in GM has provided greater confidence that our assumptions about vehicle purchasing patterns are correct.	See Table 7-1 for a discussion of possible impacts on vehicle purchasing patterns. Note that it is also possible that if the pandemic leads to business failures amongst medium/large businesses, this could lead to fleets of compliant vehicles coming on to the market.

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Source of uncertainty	OBC Discussion	Update as at Consultation	Consideration of the impacts of Covid 19
Behavioural responses	Our assumptions in terms of how drivers would respond to a CAZ in Greater Manchester have been based upon data collected in Bristol. This is the best data available and is considered more appropriate than applying survey data from London. New information from Sheffield is now available, and this needs to be tested to see whether it corroborates existing assumptions. GM will also consider any 'revealed preference' data that becomes available from other cities as schemes are launched elsewhere.	The Bristol stated preference data is no longer used. See Appendix A of the Analytical Assurance Statement for further details on a measure-by-measure basis.	There is a risk that Covid 19 affects behavioural responses to the CAZ/Funds, for example because: • Underpinning assumptions – such as the cost to upgrade – change, thus changing the relative appeal of upgrading; • Those affected are less able to make the most cost effective choice, if that requires up front investment or borrowing (see more detailed commentary below); • The availability of suitable, compliant vehicles is less than forecast; or • More vehicles are in scope for charging, because of delays to normal fleet upgrades, and therefore the support packages are not sufficient to support everyone in need. Indicative sensitivity testing has been carried out to assess the impacts of changes to behavioural responses on the effectiveness of the proposals, and on the need for support. Further sensitivity testing is planned on the post-Consultation GM CAP scheme. Monitoring of related factors (vehicle availability and cost, business and economic performance, vehicle markets etc) will be required post-pandemic.

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Source of uncertainty	OBC Discussion	Update as at Consultation	Consideration of the impacts of Covid 19
Frequency of travel	The cost effectiveness of different behavioural responses depends in part on the frequency of travel. We have identified the need for better data and new data collection is underway using ANPR surveys. We will also investigate the feasibility of further data collection to improve our knowledge. However, given the regional scale of the scheme, it is likely that the majority of vehicles in-scope will be local and therefore travel frequently and so this is less influential than for a smaller scheme.	New ANPR data has been collected however there remains a degree of uncertainty with regard to trip frequency particularly for freight (LGV and HGV) vehicles travelling into GM from outside. There will be a high degree of variation which may not have been captured adequately by the ANPR e.g. long-distance HGVs which visit infrequently and similarly coach traffic relating to particular events.	In responses to lockdown, some businesses/sole traders temporarily suspended activity, but increasingly it may be the case that activity will recommence but at a lower intensity than before. It seems likely however that this is a short term impact and that in the medium term post-pandemic those who remain trading will travel at broadly the same frequency as before (considering only the commercial vehicles in scope for the CAZ, and not car travel).
Infrequent and long distance travel	We have assumed that long distance travellers (>50 miles trip length) do not respond, which seems reasonable.	No change.	Not affected by Covid 19.

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Source of uncertainty	OBC Discussion	Update as at Consultation	Consideration of the impacts of Covid 19
	However, we cannot take account of the possible impacts of schemes in other cities on the national fleet profile. It seems reasonable to assume that if many cities introduced similar schemes, this would have a meaningful effect on the national fleet profile for in-scope vehicles, by affecting operators' abilities to relocate a non-compliant fleet, or the total cost of becoming compliant vs upgrading.		
Cost of upgrade	It is possible that the introduction or expectation of CAZs increases the price of compliant vehicles, and/or decreases the value of non-compliant vehicles. This has not been taken into account in the analysis.	We have allowed for market distortion to be considered as part of the functionality of the cost models. This has not been implemented in the core reporting but can be used for sensitivity testing.	The possible impact of a CAZ in distorting market prices is not affected by Covid 19. However, the pandemic itself may distort vehicle prices. It is possible that prices could increase as a result of constraints in the availability of compliant vehicles, as set out above, or due to increased demand arising from sustained behavioural changes post-pandemic. For example, the rise in internet shopping has led to increased demand for vans, with anecdotal evidence that vans temporarily released by construction firms were re-purposed for deliveries during lockdown. A sustained increase in van demand could place pressure on the van market. Media reports suggest that the price of second hand vans may be rising.

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Source of uncertainty	OBC Discussion	Update as at Consultation	Consideration of the impacts of Covid 19
		The extent to which this distortion occurs will be dependent on the number and scope of other CAZ projects around the country and factors in the vehicle supply chain and potential retrofit technology which are outside the control of GM. Indications for LGVs are that the issue is relatively minor for a 2023 charging scheme, but could materially affect responses in 2021 when the market supply of compliant second-hand vehicles would be constrained. There is also evidence that the availability of compliant Euro 6 diesel Hackney Cabs is very limited.	Sensitivity testing has been carried out and suggests that the GM CAP has relatively low sensitivity to price increases. Nevertheless, monitoring of vehicle prices, particularly vans, will be required post-pandemic and further sensitivity testing will be carried out on the post-Consultation GM CAP scheme.
Impact of discounts and exemptions	The analysis conducted to date assumes all vehicles are in scope for the CAZ and does not take into the possible impact of discounts and exemptions. These will be developed at FBC and are subject to public consultation.	A series of proposed discounts and exemptions have been developed with supporting policy documentation that will be subject to the planned public consultation exercise. All major discounts and exemptions are included in the core model runs.	Proposals for discounts and exemptions are being reviewed in light of the Consultation feedback and evidence on the impacts of Covid 19. The impact of any proposed discounts and exemptions will be assessed in the modelling of the post-Consultation GM CAP scheme.

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Source of uncertainty	OBC Discussion	Update as at Consultation	Consideration of the impacts of Covid 19
		Work has been conducted, as is presented in Note 12: 'Evidence of the impact of a 2021 CAZ C', to demonstrate that removing the LGV temporary exemption cannot bring forward compliance. This was supplied to JAQU on 12th July and further discussions and evidence sharing have taken place since then. Revised estimates of the number of LGVs expected to upgrade to new and second-hand vehicles were supplied to JAQU on 22nd October 2019 and further evidence on the issues with removing the LGV temporary exemption was supplied by letter on 1st November. A freight data annex was supplied on 22nd January 2020 providing freight fleet data.	
Re-routeing or change of destination	For the region-wide CAZ proposals, the demand responses to charging are applied in the demand sifting tool rather than in the highway assignment model. Therefore possible changes to origins and destinations are not captured. The GM-wide nature of the schemes reduces the likely effect of destination change at the last point of compliance.	Investigations have been undertaken using the assignment model to check on the risk of diversion. Involved liaison with infrastructure team (signing etc.) to ensure impact minimal.	Not affected by Covid 19.

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Source of uncertainty	OBC Discussion	Update as at Consultation	Consideration of the impacts of Covid 19
Access to equity or credit to facilitate behaviour change	None.	It has been assumed in simple terms that vehicle owners will take the lowest cost option, upgrading if this saves money compared to paying the charge. This in turn assumes that vehicle owners have the equity and/or access to credit to enable them to make the best financial choice. However, evidence suggests that people and businesses are not always able to save money if to do so involves a large up-front capital investment. At present around one third of credit applications are refused. Those with poor credit ratings, low or unreliable incomes, or who need to purchase a high value vehicle may struggle to access the credit they need to upgrade. The CAZ will bring forward investment in fleet upgrade. This will affect the credit worthiness of applicants, as they will have had less time to accrue a deposit, may need to purchase a higher value vehicle than normal, and may need to finance multiple vehicles at one time. As a result, total indebtedness will rise, affordability will fall and they may either face more expensive credit or be refused.	There is a risk that Covid 19 affects (worsens) access to equity or credit to facilitate behaviour change. In particular: • Businesses, individuals and charities may have reduced or exhausted their reserves/savings during the pandemic; • Businesses, individuals and charities may have become more indebted, by accessing Government or other loans, overdrafts and credit options; • Businesses, individuals and charities may not have been able to trade as normal during 2020 and therefore may find it more difficult to demonstrate that they are credit-worthy; • Turnover and profitability may be reduced due to any economic downturn arising from the pandemic, reducing the ability to save or borrow; and/or • Normal vehicle upgrades may have been delayed, increasing the loan-to-value ratio for those upgrading (because they are financing more vehicles at one time). Evidence from business surveys and statistics shows that many businesses have been affected by the pandemic in these ways. Indicative sensitivity testing has been carried out, as set out above in terms of the impact on behaviour change.

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Source of uncertainty	OBC Discussion	Update as at Consultation	Consideration of the impacts of Covid 19
		Thus, there is a risk that the models over-state the likelihood that vehicles upgrade, if upgrade is not possible or affordable due to a lack of equity or credit. The provision of grants and/or loans to assist upgrade will mitigate this risk, as well as mitigating negative socio-economic impacts on in-scope groups. It could be considered that the 'with grants' behavioural responses are more robust than the 'CAZ only' responses.	Ongoing monitoring of business performance and surveys will be required.

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8 Conclusion

8.1 Summary of recommendations

8.1.1 In summary, GM is proposing to make the following changes to the modelling process for the core scenario, in order to represent the impacts of Covid:

- Representation of delayed CAZ launch date of 2022;
- Update to bus fleet reflecting current deployment of zero emission buses;
- Apply a delay to normal fleet upgrades to the private car, van, and taxi fleets; and
- Apply a correction to the cost modelling process to prevent over-optimistic forecasting of upgrade responses as a result of the application of delays to fleet upgrades for van and taxi.

8.1.2 Any other possible impacts of the pandemic that have been identified by GM as plausible and potentially impactful will be considered via sensitivity testing.

8.2 Next steps

8.2.1 GM has submitted this paper seeking JAQU approval of the proposed approach.

8.2.2 Following approval of this approach, GM will progress re-modelling of the Do Minimum scenario and commence modelling of a post-Consultation package of measures, subject to local decision-making processes. A paper setting out the air quality impacts of these Covid 19 related revisions and of the proposed post-Consultation package of measures will be supplied to GM's ten local authorities in summer 2021.

8.2.3 Revised versions of each Technical Report as set out in Section 1.1 will be supplied as appendices to the FBC.

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APPENDIX ONE: JAQU's guidance to local authorities, February 2021

Department for Transport

Department for Environment Food & Rural Affairs

Cllr Andrew Western
Trafford Council,
Trafford Town Hall,
Talbot Road,
Stretford,
M32 0TH

22 February 2021

Dear Andrew,

The Government is implementing the 2017 Air Quality Plan to ensure that compliance with roadside nitrogen dioxide concentrations is achieved in the shortest possible time. Due to the impacts of Covid-19, we are now operating in an environment of considerable uncertainty. Despite these uncertainties we must continue to deliver cleaner air. The future impact of the pandemic on traffic levels and nitrogen dioxide emissions/concentrations will be difficult to predict. Roadside nitrogen dioxide levels will be impacted in the short term by how quickly local traffic flows re-start and in the longer term by several factors (e.g. fleet evolution, home working, modal shift, etc). Analysis and modelling can provide an indication of possible outcomes, however, given the considerable uncertainty we must accept that there is a risk of putting in place clean air measures that overachieve, however, this is preferable to inaction which leads to poor air quality.

JAQU officials have been working with Local Authorities to review the impacts of Covid-19 on their delivery plans and NO_2 levels. Based on these conversations, the data LAs have supplied to us, discussions with our expert panel and our internal review of evidence, we are now in a position to confirm next steps as to how Covid-19 impacts can be applied to central scenarios.

LAs will be able to apply some, but not all, of the results of sensitivity tests to central scenarios, depending on the level of uncertainty associated with underlying assumptions and the impact of the result on the plan. JAQU (with TIRP steer) have RAG rated the sensitivity tests that LAs have discussed with us in **Annex 1**.

LAs can use the test results as follows:

- **"Green"** rated – results can be used to influence central scenario modelling due to a higher level of confidence in the evidence (lower level of uncertainty) and/or small impact on outcomes.
- **"Amber"** rated – results may be used to influence central scenario modelling if the LA has appropriate supporting evidence. The degree of change brought about by these results will also play a factor. JAQU will require the LA to make a strong case for their inclusion, which will be assessed by JAQU and TIRP, with

a recommendation given to Ministers as to whether JAQU supports inclusion of this impact in their core modelling.

- **"Red"** rated – due to the high level of uncertainty with these tests, LAs will not be able to use the results to influence central scenario modelling, however results can be included in business cases to indicate degree of shift possible within the plan.

LAs must note that the evidence required to support Covid-19 assumptions is expected to be of at least the same level of robustness as evidence included in plans as standard. Where evidence does not achieve the required standard the results from the sensitivity tests cannot be applied to the central scenario modelling but may be included as a sensitivity test in the business case submission. LAs that include Covid-19 impacts in the central scenarios will be expected to include KPIs to monitor and evaluate these in their Monitoring & Evaluation plan.

The steps for LAs who intend to apply Covid-19 impacts to their plans are set out in **Annex 2**. The process has been designed to minimise additional delays and provide a swift decision that will enable Local Authorities to proceed in finalising their plans and implementing their measures. LAs will be expected to proceed with applying any approved Covid-19 impacts following a single TIRP and JAQU recommendation and direction or letter (as appropriate). LAs will be expected to agree a timeline with JAQU officials on the submission of their sensitivity test results by 1st March 2021. After TIRP review it is anticipated that should any further modelling be required that an LA should complete this within a maximum of 8 weeks and be done in parallel to current work.

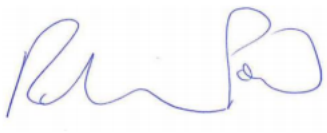
Please do not hesitate to contact your account manager if you have any questions.

Yours sincerely,



RACHEL MACLEAN

PARLIAMENTARY UNDER SECRETARY OF STATE FOR TRANSPORT



REBECCA POW

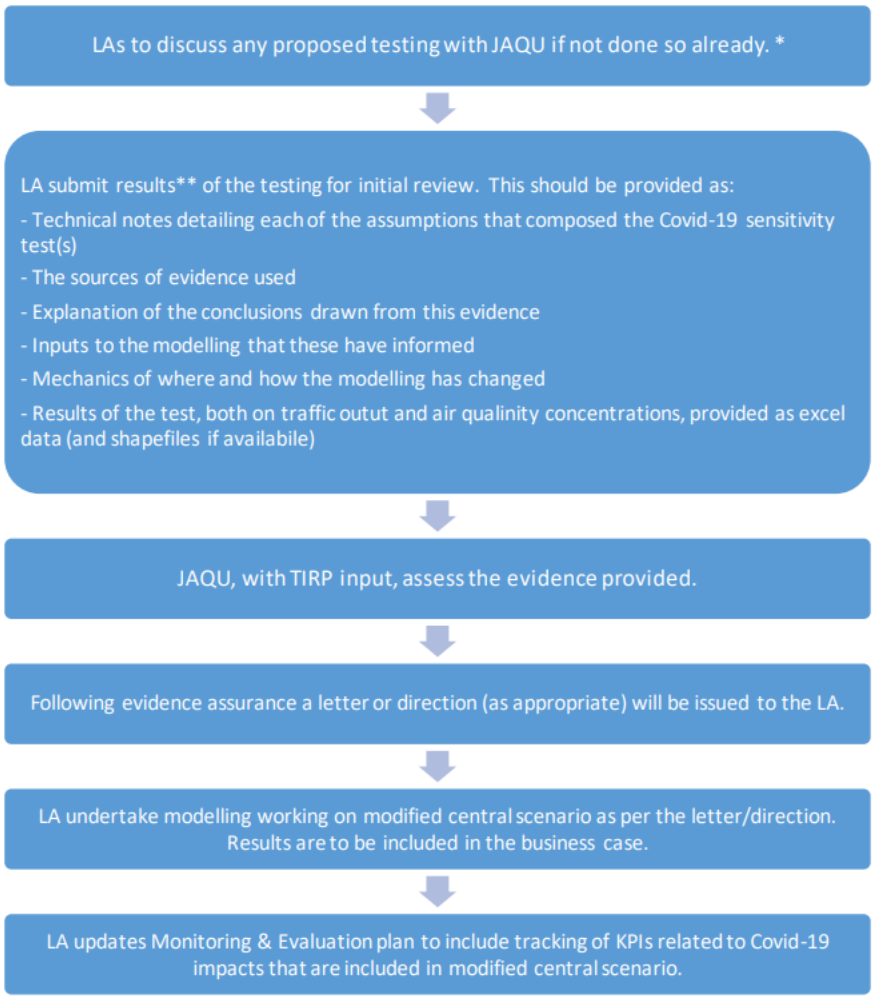
PARLIAMENTARY UNDER SECRETARY OF STATE FOR ENVIRONMENT AND RURAL AFFAIRS

Annex 1: RAG rating for sensitivity tests

Test & RAG status	Justification for categorisation and guidance on what evidence to include
Impacts of a CAZ implementation delay	• Robust evidence within LAs of any delay to CAZ go-live. • Delays simple to model.
Green recovery/measures	• Robust evidence as some LAs have developed measures that have been agreed and in places already implemented through other funding initiatives. • Impact of these tends to be highly localised (single roads, junctions, etc.)
Delayed development plans (new residential or commercial developments /infrastructure, etc.)	• Robust evidence as planning already in progress for these schemes. The original assumed demand for such schemes was known to the LA. • Only schemes of significant size will have a high impact, but most large schemes will have been considered already by LA modelling.
Fleet upgrade delay impacts	• Delay simple to model and national data readily available. • LA may have evidence to support such a delay derived from observed purchasing trends throughout 2020. • Fleet upgrade could be influenced by economic performance depending on timing of CAZ and length/depth of recession.
Reduction in CAZ charges	• LAs set these responses in their modelling based on either locally gathered surveys, central gov estimates or a literature review of similar schemes during plan development. • JAQU does not want to rule out (by putting in red) that an LA may be able to bring together a body of evidence that indicates an adjustment to these assumed response levels is warranted. • Note: JAQU central assumptions will not be updated at this time in respect to Covid-19.
Increased Stay & Pay response	• LAs set these responses in their modelling based on either locally gathered surveys, central gov estimates or a literature review of similar schemes during plan development. • JAQU does not want to rule out (by putting in red) that the LA is able to bring together a body of evidence that indicates an adjustment to these assumed response levels is warranted. • JAQU central assumptions will not be updated at this time in respect to Covid-19.
LGV/HGV change response	• Trend in goods vehicle trips and GDP growth tend to mirror each other.

	• LAs may be able to adequately source bespoke local evidence to warrant a change. Changes to this response would be inspired by local understanding of the types of businesses serviced in the CAZ area and the adaptation/ survival of those businesses post-Covid. • Note: JAQU central assumptions will not be updated at this time in respect to Covid-19.
Increased homeworking	• Level of continued homeworking post-Covid is highly speculative.
Shopping/Leisure trips (increase due to home working and/or reduction due to online shopping)	• Level of shopping and leisure trips post-Covid is highly speculative.
GDP impacts (reduced employment)	• GDP performance is highly speculative.
Impacts on public transport/modal shift (reduction in demand/capacity/supply)	• Short term aversion to public transport is driven primarily by the immediate threat of transmission of the virus so there is an expectation that this does not impact longer term behaviour. • Model limitations used in LA plans may prevent adequate modelling of these impacts (i.e. economic impact and social distancing; change in transport mode preference due to perceived fear of virus, cost of mode, etc.).
Change in car ownership assumptions	• We do not support inclusion of changes of these factors in central scenario modelling. • These factors are highly speculative (based on long term behaviours & GDP, as well as international factors). • Subcategory/consequence of GDP - wider economic, employment forecasting would need to be taken into account. Driven by length and depth of long/short term recession. Also dependent on price of oil/level of subsidy.
Changes to vehicle purchase costs/pricing (fare)	• Speculative (long term behaviours & GDP). • Subcategory/consequence of GDP - wider economic, employment forecasting would need to be taken into account. Dependent on price of oil/level of subsidy/fare.

Annex 2: Steps for LAs to follow



*LAs that have not submitted a baseline at IES stage should include green-rated tests in their baseline.

**Data needed: In addition to those items explained above, if LAs have tested a potential revised package of measures on top of the sensitivity test baseline, this should be provided for review.

***If they wish, LAs are welcome to update Monitoring & Evaluation plans to track KPIs associated with Covid-19 impacts that informed sensitivity tests but were not taken forward into the modified central scenario.

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Greater Manchester's Clean Air Plan to tackle Nitrogen Dioxide Exceedances at the Roadside

Appendix 6E: Note 38: Discounts & Exemptions – updated with final GM CAP Policy

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Warning: Printed copies of this document are uncontrolled

Version Status:	DRAFT FOR APPROVAL	**Prepared by:**	Transport for Greater Manchester on behalf of the 10 Local Authorities of Greater Manchester
Date:	20th June 2021		

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1 Introduction

Overview

1.1 In July 2017 the Secretary of State issued a Direction under the Environment Act 1995 requiring a number of Greater Manchester local authorities to produce a feasibility study to identify the option which will deliver compliance with the requirement to meet legal limits for nitrogen dioxide in the shortest possible time.

1.2 The 10 Greater Manchester local authorities have been developing the study collectively together with the GMCA, coordinated by TfGM in line with Government direction and guidance. An Outline Business Case (OBC) was duly submitted in March 2019.

1.3 Ministerial feedback was received in July 2019 along with a further direction under the Environment Act 1995 which requires all ten of the Greater Manchester local authorities to:

> *"take steps to implement the local plan for NO_2 compliance" (which was summarised as involving a Class C Charging CAZ with additional measures) and "ensure that the local plan for NO2 compliance is implemented so that–*
>
> *(a) compliance with the legal limit value for nitrogen dioxide is achieved in the shortest possible time, and by 2024 at the latest; and*
>
> *(b) exposure to levels above the legal limit for nitrogen dioxide are reduced as quickly as possible."*

1.4 The ten authorities were also required to submit further options appraisal and information which they subsequently did resulting in a number of changes to the local plan, albeit that it still provided for a Class C Charging CAZ.

1.5 The 10 Greater Manchester local authorities are now subject to a Ministerial direction dated 16 March 2020 requiring them to implement the local plan for NO2 compliance considered by the Secretary of State on March 16 2020 (which includes a Class C Charging CAZ in Greater Manchester) as soon as possible and at least in time to bring forward compliance to 2024.

1.6 The ten GM authorities conducted an eight-week consultation from 8 October to 3 December 2020. The purpose of the consultation was to seek views from residents, visitors, stakeholders and businesses on the local plan to achieve legally compliant NO_2 levels in Greater Manchester.

1.7 GM has considered the feedback from the consultation has made a number of changes to the proposals, set out in the GM CAP Policy, following consultation.

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1.8 This Technical Note 38 sets out the evidence underpinning the rationale for the local discounts and exemptions proposed in the GM CAP Policy following consultation. It also sets out the results of analysis undertaken to assess the possible impact of the proposed national and local discounts and exemptions on achieving compliance in the shortest possible time.

2 Background

National Guidance

2.1 The UK government's 'Clean Air Zone Framework: Principles for setting up Clean Air Zones in England'[1], sets out the approach that is expected to be taken by local authorities when implementing and operating a Clean Air Zone in England. Section 3.9 of the guidance states the following in relation to discounts and exemptions:

> *"There is a general presumption that the requirements for charging Clean Air Zones will apply to all vehicles according to the relevant zone class.*
>
> *There will be certain circumstances where exemptions and discounts from a charge will be appropriate. This may be because of a person's particular circumstances; the type of vehicle concerned may be difficult or uneconomic to adapt to comply with a zone's requirements; or the operation a vehicle is engaged in is particularly unique or novel.*
>
> *Discounts and exemptions should, in general, be based on the principle that;*
>
> - *specialist vehicles that can never be compliant should qualify for an exemption from a charge;*
> - *a sunset period should be allowed for specialist or more novel vehicles that can become compliant in a suitable time to allow for them to be changed.*
>
> *While exemptions should be kept to the minimum necessary in order to maximise the benefits of a zone, local authorities may also consider additional exemptions or discounts based on particular local circumstances. Local authorities may consider ways in which the cost of any charge to enter areas could be reduced for groups they identify as facing particular challenges, so long as this is achieved in a way which does not slow down the achievement of the outcomes of the zone. This might, for example, take into account the location of a charging zone in relation to key local businesses or services.*
>
> *Local Authorities will also need to think about enforcement relating to exemptions and discounts in designing a zone. This section sets out*

[1] Department for Environment, Food & Rural Affairs and Department for Transport. 2020. Clean Air Zone Framework. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/863730/clean-air-zone-framework-feb2020.pdf

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where national exemptions should apply, and the circumstances in which local exemptions or discounts may be appropriate. Additional exemptions should not be applied where doing so would negate the overall benefits of the zone."

2.2 There are no temporary national exemptions or national discounts stipulated within the Government's Clean Air Zone Framework.

3 Greater Manchester's principles for discounts and exemptions

3.1 Whilst there is a general presumption that the requirements for charging Clean Air Zone (CAZ) will apply to all vehicles according to the relevant zone class, there will be certain circumstances where discounts or exemptions from a charge will be appropriate.

3.2 Taking the Government guidance into account, the following principles for discounts and exemptions in GM will apply:

- Guidance on national exemptions will be adhered to, meaning certain categories of vehicles which cannot reasonably comply with the required emissions standards (e.g. historic or non-road going vehicles) will not be required to pay a charge; and
- As per the Government's guidance in Section 145 of the CAZ Framework, any local discounts or exemptions, when considered in addition to the national exemptions, will not negate the overall benefits of the zone.

3.3 GM have treated the policy in respect of local discounts and exemptions (namely, to ensure that any local discounts or exemptions will not negate the overall benefits of the zone) as requiring (i) that they will not postpone the date on which legal compliance in Greater Manchester is achieved, and (ii) that the benefits of not charging users outweigh the disadvantages of doing so.

3.4 The proposed discounts and exemptions for the GM CAZ, both permanent and temporary, are described in turn below, alongside the JAQU guidance, rationale and evidence. It should be noted that the majority of these discounts and exemptions are consistent with the published approaches taken by other cities proposing a CAZ e.g. Leeds and Birmingham.

3.5 These discounts and exemptions fall into four categories:

- Permanent national exemptions;
- Permanent local exemptions;
- Temporary local exemptions[2]; and
- Permanent local discounts.

[2] A temporary local exemption is time limited exemption, applied for a fixed period. Within this temporary local exemption period, eligible vehicles would not pay a charge. Following the expiry of a temporary local exemption, non-compliant vehicles will be charged. Note that there may be a requirement to apply for discounts and exemptions

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3.6 The proposed discounts and exemptions were subject to consultation in autumn 2020 and the proposals considered here reflect the position set out in the GM CAP Policy following consultation.

4 Permanent exemptions

Permanent national exemptions

4.1 The Government's Clean Air Zone Framework sets out permanent national exemptions i.e. those which will be exempt from charges for all CAZs within England, including the GM CAZ. These are in place due to some types of vehicle being particularly difficult or uneconomic to adapt to comply with the framework's requirements. They also cover vehicles that are engaged in particularly unique or novel operations. National, permanent exemptions that apply to all CAZs are set out in **Table 4-1**, alongside the rationale for inclusion and an assessment of the possible impact on achieving compliance in the shortest possible time.

4.2 **Table 4-1** shows that applying the permanent national exemptions is not likely to undermine the ability to meet air quality compliance in Greater Manchester in the shortest possible time. The permanent national exemptions are set out in the CAZ Framework and GM considers that the benefits of not charging users in such cases outweigh the disadvantages of doing so.

4.3 All permanent national exemptions are assessed as having a negligible impact due to the very small proportion of vehicles in scope.

Permanent local exemptions

4.4 In addition to stipulating national exemptions, the Government's Clean Air Zone Framework makes provision for local authorities to consider allowing additional exemptions or discounts based on particular local circumstances. GM has proposed a series of permanent local exemptions in the Policy following Consultation. These are set out in **Table 4-2**, alongside the rationale for inclusion and an assessment of the possible impact on achieving compliance in the shortest possible time. This analysis considers the possible impact in terms of the proportion of the total vehicle fleet within the scope of the GM CAZ.

4.5 It is also worth noting that, where it is not possible or practical to upgrade vehicles, applying an exemption would remove the cost burden of the charge. It would not however be expected to affect the choice to upgrade or not. In other words, this group would not be expected to upgrade with or without the exemption.

4.6 Three new permanent local exemptions have been proposed following consultation. These are for LGVs and minibuses that have been adapted for use by a disabled user (but do not qualify for the Disabled Tax Class exemption, which depends upon eligibility for certain benefits); driver training buses; and heritage buses not used for hire or reward.

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4.7 **Table 4-2** shows that applying the permanent local exemptions is not likely to undermine the ability to meet air quality compliance in Greater Manchester in the shortest possible time. GM considers that the benefits of not charging users in such cases outweigh the disadvantages of doing so.

4.8 All proposed permanent local exemptions are assessed as having a negligible impact due to the very small proportion of vehicles in scope.

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Table 4-1 Permanent national exemptions to CAZ charges, set by the Government

Permanent national exemptions	Description	Rationale	Impact on compliance
Historic vehicles	Vehicles with a 'historic' vehicle tax class (vehicles built or first registered more than 40 years ago)	Exempt due to age and unsuitability for compliant retrofitting	Negligible. Based upon ANPR sample data[3] and analysis of recorded vehicles which are within the historic vehicle tax class, the quantity of eligible vehicles has been estimated at less than 0.5% of total vehicles serving GM.
Military vehicles	Vehicles in use by UK Armed Forces	Exempt from charges by virtue of Section 349 of the Armed Forces Act 2006	Negligible. Military vehicles could not be identified from the ANPR dataset. The volume of military vehicles is assumed to be low as there are no military bases in GM and only a small number of Army Reserve Centres.
Disabled Passenger Vehicle (DPV)	Vehicles within the DVLA Disabled Passenger Vehicle tax class, used by organisations providing transport for disabled people.	This group of vehicles may include a range of specialist and/or novel or adapted vehicles, where it may generally not be practical to upgrade to a vehicle compliant with the emission standards of the GM CAZ.	Negligible. Based upon ANPR sample data and analysis of recorded vehicles which are within the DPV tax class, the quantity of eligible vehicles has been estimated at less than 0.5% of total vehicles serving GM based on the ANPR sample.
Specialist Emergency Service Vehicles	Specialist vehicles in use by emergency services, such as aerial ladders and major incident command vehicles.	This group of vehicles may include a range of specialist and/or novel or adapted vehicles where it may generally not be practical to upgrade to a vehicle compliant with the emission standards of the GM CAZ.	Negligible. Emergency services vehicles (including specialist emergency service vehicles and other vehicles used by emergency services) were identified in the ANPR data as accounting for less than 0.5% of total vehicles recorded. Emergency services in GM have a 4 – 10 year replacement cycle and therefore much of the fleet will be compliant upon the operation of the GM CAZ.

[3] For details of GM's ANPR survey, see Technical Note 5: ANPR Survey - Summary of Initial Findings

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Table 4-2 Permanent local exemptions to GM CAZ charges proposed by Greater Manchester

Permanent local exemptions	Description	Rationale	Impact on compliance
Specialist Heavy Goods Vehicles	Certain types of heavily specialised HGVs, such as certain vehicles used in construction or vehicle recovery. The following are eligible to apply for exemption: • Vehicles in the DVLA Special Types Tax Class [4] and specified in an Order under Section 44 of the Road Traffic Act 1994; • Vehicles in the DVLA Special Vehicles Tax Class and meeting the definition of a "special vehicle" under Part IV of Schedule 1 of the Vehicle Excise and Registration Act 1994 (VERA); • Vehicles in the DVLA Recovery Vehicle Tax Class and meeting the definitions and criteria in	This group of vehicles includes certain novel or adapted road going HGVs of a particularly specialised nature, meaning it may not be practical to upgrade to a vehicle compliant with the emission standards of the GM CAZ.	Negligible. Based on data obtained from the DfT the quantity of specialist HGVs has been estimated at less than 0.5% of total vehicles serving GM[5]. Specialist HGVs represent c.6% of the HGV fleet and are assumed to make up a lower proportion of total HGV mileage, as they spend most of the time stationary.

[4] Information on tax classes for vehicles is available at: https://www.gov.uk/government/publications/v3551-notes-about-tax-classes

[5] 29,500 non-road going and specialist vehicles have been identified by the DfT, around 6% of the total number of HGVs registered in the UK, see https://www.theconstructionindex.co.uk/news/view/all-terrain-cranes-to-remain-exempt-from-mandatory-checks

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Permanent local exemptions	Description	Rationale	Impact on compliance
	Part V of Schedule 1 of the VERA; • Vehicles in the DVLA Special Concessionary Tax Class and meeting the definitions and criteria in paragraphs 20B, 20C, 20D, 20E, 20F, 20H or 20J of Schedule 2 of the VERA); • Vehicles in the DVLA Limited Use Tax Class and meeting the definition and criteria in paragraph 20A of Schedule 2 of the VERA.		
Non-road-going vehicles	Certain types of non-road going vehicles which are allowed to drive on the highway such as agricultural machines; digging machines; and mobile cranes	This group of vehicles includes a range of specialist and/or novel or adapted vehicles, where it may generally not be practical to upgrade to a vehicle compliant with the emission standards of the GM CAZ.	Negligible. Based upon ANPR sample data and that obtained from the DVLA, as above, the quantity of non-road going vehicles has been estimated at less than 0.5% of total vehicles serving GM.
Vehicles used by emergency services	Certain types of vehicles used by emergency services front line emergency and certain non-emergency vehicles	This group of vehicles includes a range of vehicles, associated with front line emergency response, and where it may generally not be practical to upgrade to a vehicle compliant with the emission standards of the GM CAZ, which are not captured by the national exemption.	Negligible. Emergency services vehicles (including specialist emergency service vehicles and other vehicles used by emergency services) were identified in the ANPR data as accounting for less than 0.5% of total vehicles recorded. Emergency services in GM have a 4 – 10 year replacement cycle and therefore much of the fleet will be compliant.

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Permanent local exemptions	Description	Rationale	Impact on compliance
Community Minibuses	Those operating under a permit under section 19 or section 22 of the Transport Act (1985), issued by a body designated by the Secretary of State	These vehicles provide important access to employment, education and training for people who may otherwise be isolated, including those with mobility issues and located in areas with poor public transport accessibility. They also facilitate inclusion in social and community activities.	Negligible. Based on ANPR sample data, minibuses are estimated to make up less than 1% of vehicles serving GM and it is estimated that around 30% of this fleet is eligible for section 19 and section 22 permits.
Showmen's vehicles	Fairground/funfair vehicles which are registered with the Showmen's Guild, in the tax classification of Showman's HGV or Showman's Haulage under the DVLA Special Vehicles Tax Class and meet the definition of a 'showman's vehicle' or a 'showman's goods vehicle' within the meaning of section 62 of the VERA.	This group of vehicles includes a range of specialist and/or novel or adapted vehicles, where it may generally not be practical to upgrade to a vehicle compliant with the standards of the GM CAZ.	Negligible. Showmen's Guild vehicles could not be identified from the ANPR dataset. The volume of such vehicles is assumed to be low given their specialised use for intermittent events.
Driving within the zone because of a road diversion	Vehicles driving within the zone because of a road diversion who would otherwise not have entered the GM CAZ. Applies only while the diversion is active and subject to non-compliant vehicles being on the designated diversion route.	This exemption is aimed at protecting road safety and recognises that vehicles may enter the GM CAZ for reasons outside of the driver's control. The exemption will apply to vehicles which enter the GM CAZ as a direct result of a road diversion only.	It is not possible to quantify the impact of this exemption but it is likely to be negligible as the incidences would be of short duration and involve a very small proportion of the total vehicles travelling within the GM CAZ, where eligible vehicles are not already visiting GM as part of their overall journey in any case.

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Permanent local exemptions	Description	Rationale	Impact on compliance
Disabled Tax Class vehicles	Vehicles used by, or for the purposes of a disabled person which are exempt from vehicle tax, i.e. those in the DVLA Disabled Tax Class and meeting the definitions and criteria in paragraphs 18 and 19 of Schedule 2 of the VERA are eligible to apply for exemption.	This exemption is complementary to the exemption for Disabled Passenger vehicles. An exemption certificate will have been secured for vehicles within this group, following a successful application to the Driver and Vehicle Licensing Authority (DVLA) for exemption from vehicle tax. The vehicle must be used solely for the purposes of the disabled person.	Negligible. Based upon ANPR sample data and analysis of recorded vehicles which are within the Disabled tax class, the quantity of eligible vehicles has been estimated at less than 0.5% of total vehicles serving GM based.
LGVs and minibuses adapted for a disabled user	LGVs and Minibuses specifically adapted for use by a disabled user and not used for hire or reward. These vehicles will have a substantial and permanent adaptation to the vehicle, specific to suit a disabled wheelchair user's particular needs to enable them to travel in the vehicle, or enter and drive it[6].	This exemption recognises privately owned LGVs and Minibuses specially adapted for use by a disabled user, which are not covered by the Disabled Tax Class exemption. The exemption is subject to restrictions on its use through eligibility criteria to ensure it is used primarily for the transport of a disabled person and is not used for hire or reward.	Negligible. It is likely that most specially adapted LGVs and minibuses will be eligible under the Disabled Tax Class exemption and that only this exemption will apply to a very small number of additional vehicles.

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[6] The definition of substantial and permanent adaptation draws on guidance from HMRC that: The adaptation to the vehicle must be both necessary and specific to suit the disabled wheelchair user's particular needs to enable them to travel in the vehicle, or enter and drive it. The adaptation should alter the vehicle in a meaningful way, enabling the wheelchair user to use the vehicle which they could not use before it was adapted. For a vehicle to be considered as substantially and permanently adapted it is expected that significant change to the vehicle has been made with the adaptations being bolted or welded to the body or chassis of the vehicle. Adaptations that are wired into the electrics of the vehicle could also qualify as substantially and permanently adapted. For adaptations to be considered permanent it's expected that they should be fitted to the vehicle for the shorter of either a minimum of 3 years or the lifetime of the vehicle. If the adaptation is removed before this time, then the adaptation may not be considered to be permanent and therefore the vehicle should not have been eligible for exemption. A disabled person who usually uses a wheelchair needs to be able to take it with them in the vehicle. Vehicles often need to be substantially adapted to allow a fixed frame or motorised wheelchair designed for permanent use to be transferred into the vehicle, using a ramp and a winch or a hoist, and for it to be held safely and securely in place throughout the journey. Where a wheelchair can be folded and stowed in the boot of a vehicle, the vehicle does not need to be substantially and permanently adapted to carry it. Whilst some minor adaptations may be required, it's not sufficient to meet the 'substantially and permanently adapted' qualifying condition and the vehicle will not qualify for exemption. The following are not considered as substantial and permanent adaptations because they are widely available accessories or upgrade options the: fitting of a roof rack or standard roof box; attachment of a trailer to the back of a vehicle; fitting of automatic transmission; fitting of parking or reversing sensors. This list is not exhaustive. Further information available at: https://www.gov.uk/guidance/vat-relief-on-adapted-motor-vehicles-for-disabled-people-and-charities-notice-1002#sec3

Permanent local exemptions	Description	Rationale	Impact on compliance
Driver training buses	Buses adapted for use for, and dedicated to, driver training purposes and owned by the Applicant prior to 3rd December 2020.	This exemption recognises specially adapted buses for dedicated use as driver training vehicles, which are specialist and/or novel or adapted vehicles, where it may generally not be practical to upgrade to a vehicle compliant with the standards of the GM CAZ.	Negligible. Driver training buses account for a very small proportion of total bus mileage. Any buses coming into operation from 2021 onwards will be required to be compliant or pay the charge.
Heritage buses not used for hire or reward	Heritage buses which are over 20 years old and which are not used for hire or reward.	This exemption recognises privately owned heritage buses over 20 years old that do not fall within the Historic Vehicle Tax Class, which are specialist and/or novel or adapted vehicles, where it may generally not be practical to upgrade to a vehicle compliant with the standards of the GM CAZ. The exemption is subject to restrictions on its use through eligibility criteria to ensure the vehicle is not used for hire or reward.	Negligible. Very few vehicles, likely to be operating at low mileage, are likely to be in scope for this exemption.

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5 Temporary exemptions

Temporary national exemptions

5.1 No temporary national exemptions are proposed.

Temporary local exemptions

5.2 GM has proposed a series of temporary local exemptions in the Policy following Consultation. These are set out in **Table 5-1**, alongside the rationale for inclusion and an assessment of the possible impact on achieving compliance in Greater Manchester in the shortest possible time. This analysis considers the possible impact in terms of the proportion of the total vehicle fleet in scope.

5.3 Following consultation, all temporary local exemptions proposed by GM, set out in **Table 5-1,** are proposed to expire on 31st May 2023.

5.4 The modelling process applies these temporary local exemptions in the relevant years and where the relevant vehicle type and behavioural response is represented within the modelling architecture. The cost modelling approach applied calculates the various proportions of responses (upgrade, stay and pay, cancel trip) to the charging CAZ measures alongside the associated financial assistance where applicable in each of the modelled years of 2021[7], 2023 and 2025, with interpolation applied to estimate outcomes in interim years.

5.5 Within the modelling process, the CAZ is assumed to be fully in place (in other words, with no remaining temporary exemptions) in 2023. Modelling of the post-Consultation policy demonstrates that even with the scheme fully in place, compliance is not achieved in 2023. A further year of natural fleet renewal is required in order for compliance to be achieved in 2024. Therefore, the temporary local exemptions are not forecast to delay compliance from 2023 to 2024.

5.6 As long as the temporary local exemptions have been removed early enough that drivers will have had time to be influenced by the forthcoming CAZ charge, make their choices and obtain a new vehicle before 1st January 2024, then the temporary local exemptions would not affect the predicted legal compliance date.

5.7 **Table 5-1** shows that applying the proposed temporary local exemptions is not likely to negate the overall benefits of the GM CAZ or undermine the ability to meet air quality compliance within the shortest possible time.

[7] Note that modelling is being carried out for 2021 only to allow GM to interpolate results for 2022. 2021 will no longer be a reported year given that it is proposed that the CAZ opens in 2022.

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5.8 Where the vehicle populations in scope (and their associated emissions) are meaningful, the proposed temporary local exemptions are assessed as having a low risk of undermining the ability to meet air quality compliance in Greater Manchester in the shortest possible time. GM considers that the benefits of not charging users outweigh the disadvantages of doing so.

5.9 Where only a very small proportion of vehicles are in scope, the proposed temporary local exemptions are assessed as having a negligible risk of undermining the ability to meet air quality compliance in Greater Manchester in the shortest possible time. GM considers that the benefits of not charging users outweigh the disadvantages of doing so.

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Table 5-1 Temporary local exemptions to CAZ charges proposed by Greater Manchester

Temporary local exemptions	Description	Rationale	Impact on compliance
LGVs and minibuses (which are not a licensed hackney or PHV or used to provide a registered bus service within GM)	Light Goods Vehicles (LGVs) and minibuses which are not used as a licensed hackney, PHV or on a registered bus service within GM, are eligible for a temporary exemption until 31st May 2023. After 31st May 2023, non-compliant vehicles will be charged.	GM evidence indicates that the cost and availability of new, second and third hand compliant LGVs will not provide a viable or an affordable option for many operators (especially for the smallest businesses and sole traders) to upgrade to a compliant vehicle in 2022, given the scale of the GM CAZ[8]. Introducing a charge in 2022 risks many operators having to switch from using an LGV to a pre-Euro 6 diesel car or stop trading. Given the number of LGVs operating in GM, there is also a high risk of there being insufficient time in advance of 2022 to administer the funding required to support affected parties to upgrade to compliant LGVs.	Low. As set out above, modelling demonstrates that as long as the temporary exemptions have been removed early enough that drivers will have had time to be influenced by the forthcoming CAZ charge, make their choices and obtain a new vehicle before 1st January 2024 (the year of compliance), then the temporary exemptions would not affect the predicted legal compliance date. As the temporary exemption will expire on 31st May 2023, sufficient time is available in advance of 1st January 2024 for affected vehicles owners/registered keepers of these vehicles to upgrade to a compliant vehicle. A key rationale for the proposed exemption is that it is not considered likely that this large non-compliant fleet can upgrade by the point at which the CAZ is introduced. The provision of funds to support upgrade from 2021 is however intended to encourage early upgrade.

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[8] See Technical Note 12 - Evidence of the impact of 2021 CAZ C

Temporary local exemptions	Description	Rationale	Impact on compliance
GM licensed Hackneys and PHVs	Hackneys and Private Hire Vehicles (PHVs), which are licensed to one of the 10 GM Authorities as of the 3rd December 2020 are eligible for a temporary exemption until 31st May 2023. After 31st May 2023, non-compliant vehicles will be charged.	The evidence from the COVID-19 impacts analysis shows major impacts on the GM taxi trade. This exemption recognises that GM licenced hackneys and private hire vehicles require time to recover from the financial effects of COVID-19 and the ability to invest in upgrades to compliant alternatives before a charge is applied.	Low. As set out above, modelling demonstrates that as long as the temporary exemptions have been removed early enough that drivers will have had time to be influenced by the forthcoming CAZ charge, make their choices and obtain a new vehicle before 1st January 2024, then the temporary exemptions would not affect the predicted legal compliance date. As the temporary exemption will expire on 31st May 2023, sufficient time is available in advance of 1st January 2024 (the year of compliance) for affected vehicles owners/registered keepers of these vehicles to upgrade to a compliant vehicle. A key rationale for the proposed exemption is that it is not considered likely that this fleet can upgrade by the point at which the CAZ is introduced in 2022 due to the major impacts of COVID-19 on the trade. The provision of funds to support upgrade from 2021 is however intended to encourage early upgrade.

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Temporary local exemptions	Description	Rationale	Impact on compliance
Coaches and buses not used on a registered bus service.	Coaches and buses not used on a registered bus service are eligible for a temporary exemption until 31st May 2023. After 31st May 2023, non-compliant vehicles will be charged.	The evidence from the Covid impacts analysis, shows major impacts on coach operators. This exemption recognises the high upgrade cost of coaches and that they require time to recover from the financial effects of COVID-19. 69% of coach operators are small businesses, with many providing services for vulnerable groups, particularly children, elderly people and those on low incomes. A temporary exemption provides further time for non-compliant vehicles to be upgraded to meet the standards required by a GM CAZ and protects vital services.	Low. As set out above, modelling demonstrates that as long as the temporary exemptions have been removed early enough that drivers will have had time to be influenced by the forthcoming CAZ charge, make their choices and obtain a new vehicle before 1st January 2024 (the year of compliance), then the temporary exemptions would not affect the predicted legal compliance date. As the temporary exemption will expire on 31st May 2023, sufficient time is available in advance of 1st January 2024 for affected vehicles owners/registered keepers of these vehicles to upgrade to a compliant vehicle. A key rationale for the proposed exemption is that it is not considered likely that this largely non-compliant fleet can upgrade by the point at which the CAZ is introduced, given the high cost of upgrade and the impacts of COVID-19 on the coach industry[9]. The provision of funds to support retrofit and upgrade from 2021 will encourage early upgrade.

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[9] See Technical Note 4: Coach Market Analysis

Temporary local exemptions	Description	Rationale	Impact on compliance
Outstanding finance or lease on non-compliant vehicles	Non-compliant vehicles subject to finance or lease agreements entered into before 3rd December 2020 which will remain outstanding at the time at which the GM CAZ becomes operational, are eligible for a temporary exemption until the agreement ends or until 31st May 2023, whichever is sooner. After 31st May 2023, non-compliant vehicles will be charged.	A move to a compliant vehicle is not considered feasible due to outstanding finance, which was entered into before information on the GM CAZ had been made publicly available.	Low. Vehicle leasing is commonly offered for new vehicles, which would be compliant with the scheme, and therefore the impact of the exemption for leased vehicles is assumed to be negligible. It is estimated that around 30% of vehicles are purchased with vehicle finance; this is available for both new and second-hand vehicles. New vehicles would be compliant with the scheme but some vehicle owners may have outstanding finance agreements on non-compliant second-hand vehicles. GM is not able to quantify the number of vehicles this could apply to. Given that these vehicle owners are in a binding finance agreement, they may not be in a position to upgrade with or without the temporary exemption. Applying a charge would raise revenues but would not be expected to deliver additional upgrades. The temporary exemption is therefore unlikely to affect whether compliance is achieved but would provide a period for those in finance agreements to seek a route to compliance.

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Temporary local exemptions	Description	Rationale	Impact on compliance
Limited supply (awaiting delivery of a compliant vehicle)	Owners or registered keepers of non-compliant vehicles that can demonstrate they have placed an order for a compliant replacement vehicle or retrofit solution, are eligible for a temporary exemption until such a time as they are in receipt of the compliant replacement vehicle or retrofit solution, or for 12 weeks, or until 31st May 2023, whichever is sooner. After 31st May 2023, non-compliant vehicles will be charged.	Upgrade to a compliant vehicle is not immediately possible due to an issue with the supply of a compliant vehicle or retrofit solution on order, which is considered outside of the control of the applicant.	Negligible. Given that vehicle owners are awaiting delivery of a compliant vehicle, they are not in a position to upgrade earlier without the temporary exemption. The temporary exemption is therefore unlikely to affect whether compliance is achieved.
Buses operating on school bus contracts entered into before 31st March 2019 and which expire in July 2022.	Buses used on a GM school bus service where the contract ends in July 2022 and where the contract was tendered prior to 31st March 2019 (submission of the GM CAP OBC[10]) are eligible for a temporary exemption to 31st July 2022. These buses must have been identified on the GM bus fleet register for at least 6 months. These vehicles will not be considered for funding under the GM CAP scheme. The vehicles must not be used for registered bus services within GM beyond 31st July 2022.	101 school bus contracts were entered into before 31st March 2019 and are due to expire in July 2022. 39 buses operating on those contracts, are reaching end of life and cannot be retrofitted.	No. The exemption applies to a small number of buses and to end July 2022 only. Any buses remaining in service beyond July 2022 will be subject to the CAZ.

[10] GM submitted an Outline Business Case (OBC) setting out the GM CAP proposals to the Government at the end of March 2019.

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6 Permanent discounts

Permanent national discounts

6.1 No permanent national discounts are proposed.

Permanent local discounts

6.2 GM proposed two permanent local discounts in the Policy for Consultation. Following consultation, the proposed local discount for PHVs also used as a private car has been removed, and some changes have been made to the proposed local discount for leisure vehicles in private ownership.

6.3 The revised local discount as proposed in the Policy following consultation is set out in **Table 6-1**, alongside the rationale for inclusion and an assessment of the possible impact on achieving compliance in Greater Manchester in the shortest possible time. This analysis considers the possible impact in terms of the proportion of the total vehicle fleet in scope.

6.4 As summarised in **Table 6-1**, applying the permanent local discount is not likely to undermine the ability to meet air quality compliance in Greater Manchester in the shortest possible time. GM considers that the benefits of not charging users in such cases outweigh the disadvantages of doing so.

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Table 6-1 Permanent local discounts to CAZ charges proposed by Greater Manchester

Permanent local discounts	Description	Rationale	Impact on compliance
Private HGV Tax Class vehicles	Owners or registered keepers of vehicles in the DVLA Private HGV Tax Class[11] and meeting the definition of s "special vehicle" in paragraph 4(2)(bb) of Schedule 2 to the VERA are eligible for a discounted charge. The vehicle would be subject to a charge equivalent to the LGV daily charge (£10 a day), rather than the HGV daily charge (£60 a day).	HGVs in the DVLA Private HGV Tax Class are used unladen, privately or for driver training purposes.	Negligible. It has not been possible to quantify the number of vehicles in the Private HGV Tax Class but it is considered likely that they account for less than 0.5% of total vehicles serving GM.

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[11] Information on tax classes for vehicles is available at: https://www.gov.uk/government/publications/v3551-notes-about-tax-classes

7 Conclusion

Rationale for exemptions and discounts

7.1 This report sets out the rationale for the proposed temporary and permanent local exemptions and permanent local discounts. More evidence supporting this rationale can be found in the following Technical Notes and reports[12]:

- Technical Note 3: Freight market analysis
- Technical Note 4: Coach market analysis
- Technical Note 12: Evidence of the impact of a 2021 CAZ C
- Technical Note 18: Minibus fleet research
- Technical Note 19: Taxi and PHV fleet research
- Impact of Covid-19 on the GM CAP Report[13]

7.2 Feedback from the consultation is set out in the AECOM Consultation Report[14].

Impact on achieving compliance in Greater Manchester in the shortest possible time

7.3 In total, the vehicles in scope for a permanent local exemption or discount from the CAZ represent a very small proportion of the total number of vehicles serving GM (where this could be quantified) and in scope for the CAZ. Furthermore, many of the vehicles in scope would not in practice be able or likely to upgrade with a charge. The risk that applying the proposed permanent national and local exemptions and discount undermines the ability to meet air quality compliance in Greater Manchester in the shortest possible time is therefore considered to be negligible.

7.4 A more substantial proportion of the vehicle fleet is proposed to be eligible for a temporary local exemption to 31st May 2023. The GM CAP proposes a range of temporary local exemptions, set out in Section 4, which will expire on 31st May 2023 and so no longer be in place by 2024. As long as the temporary local exemptions have been removed early enough that drivers will have had sufficient time to be influenced by the forthcoming CAZ charge, make their choices and obtain a new vehicle before 1st January 2024, then the temporary local exemptions would not affect the predicted legal compliance date.

[12] All available at Technical Documents | Clean Air Greater Manchester (cleanairgm.com)
[13] Supplied as Appendix 5 of the June 2021 GMCA Report 'Greater Manchester Clean Air Plan'
[14] Supplied as Appendix 3 of the June 2021 GMCA Report 'Greater Manchester Clean Air Plan'

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7.5 In summary, it is not considered likely that the proposed exemptions and discount undermine the ability to meet air quality compliance in Greater Manchester in the shortest possible time and by 2024 at the latest based on the evidence available.

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Greater Manchester's Clean Air Plan to Tackle Nitrogen Dioxide Exceedances at the Roadside

Appendix 7 – Economic Implications of CAP following Consultation and with COVID-19 impacts

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1. Introduction

1.1 As a result of elevated NO_2 concentrations in major urban areas since 2010, the UK has been in breach of European Union (EU) Limit Values for annual mean concentrations of nitrogen dioxide (NO_2), as set by the European Ambient Air Quality Directive (2008/50/EC), which incorporates many World Health Organisation air quality standards into European Law. This is a result of elevated NO_2 concentrations in major urban areas, including Greater Manchester (GM). The EU Limit Values are transposed into English Law by the Air Quality Standards Regulations 2010.

1.2 The UK Government's Air Quality Plan requires local authorities with persistent exceedances to undertake local action to consider the best option to meet statutory NO_2 limit values in the shortest possible time.

1.3 In March 2019, the ten GM Local Authorities collectively submitted an Outline Business Case (OBC) for the Greater Manchester Clean Air Plan (GM CAP) to the Joint Air Quality Unit (JAQU) outlining a package of measures to deliver regional compliance with EU Limit Value for NO_2 emissions in the shortest possible time. In July 2019, a ministerial direction under the Environment Act 1995, the Environment Act 1995 (Greater Manchester) Air Quality Direction 2019 was made, which requires all ten of the GM local authorities to implement a charging Clean Air Zone Class C across the region, hereafter referred to as the Greater Manchester Clean Air Zone (GM CAZ).

1.4 As well as fulfilling the legal obligation, the CAP will support GM's strategic aim of achieving carbon neutral living by 2038.

1.5 The GM CAP was developed using pre-Covid-19 Government guidance, applicable to a pre-pandemic world. The CAP Consultation has been undertaken in the midst of Covid-19, which has highlighted the financial burden on individuals and businesses and their ability to invest.

1.6 The purpose of this report is to consider the potential implications of the GM CAP on the economy of GM, recognising that conditions are more uncertain than usual. The note does not provide the GM CAP cost-benefit analysis, which is reported elsewhere, nor quantify the possible economic impacts. The report focuses on available evidence and provides a qualitative assessment of the possible economic impacts of a CAZ on GM, and the extent to which the Clean Air Fund measures may mitigate any negative impacts.

1.7 The remainder of this note is structured as follows:

- Section 2 sets out the high-level economic impacts of Clean Air Zones;
- Section 3 discuss the development of the GM CAP (prior to the impact of Covid-19);

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- Section 4 summaries aspects of impact of Covid-19;
- Section 5 discusses some of the key changes to the CAP following the Consultation exercise in consideration of impacts of Covid-19;
- Section 6 summarises the potential economic implications of the GM CAP post Covid-19; and
- Section 7 summarises the main conclusions from the note.

2. Economic Impacts of Clean Air Zones

2.1 Clean Air Zones are an effective way of delivering reductions in traffic emissions and consequent improvements in air quality. They have been proposed as the preferred approach to achieving these reductions following discussions with JAQU and through the development of an OBC.

2.2 The GM CAP OBC demonstrated that only a GM-wide CAZ (with supporting measures) could deliver compliance with legal NO_2 limits in the shortest possible time. Poor air quality imposes costs on society, primarily resulting from ill health and most affects those with long-term health conditions. It leads to chronic ill health, school and work absences, and contributes to the equivalent of 1,200 deaths per year in GM[1] alone.

2.3 Nevertheless, it is recognised that by seeking to reduce some of the current health impacts CAZs do also impose new financial costs on non-compliant vehicle owners, and these financial costs can then have differing and adverse wider impacts on local economies.

2.4 Direct financial costs which may be incurred by some vehicle owners include:

- Daily charges on non-compliant vehicles which are not exempt;
- Penalty costs if the above daily charges apply but are not paid (PCNs);
- Retrofit costs on existing non-compliant vehicles;
- Vehicle purchase and transaction costs when upgrading from a non-compliant to a compliant vehicle;
- Vehicle refit / rebranding; and
- Electric vehicle infrastructure.

2.5 Associated broader cost and behavioural change impacts may include:

[1] https://www.manchester.gov.uk/downloads/download/4166/air_quality_reports

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- Changes in the price of goods and services for end consumers to offset some of the costs to businesses;

- Potential change in travel habits, particularly commercial vehicle usage, such as vehicle use being less frequently;

- Potential relocation inside / outside of the CAZ boundary;

- Potential changes in demand for goods and services as a result of cost changes to consumers and / or change (reduction) in the range of business suppliers;

- Potential changes in vehicle prices as second-hand compliant vehicles may become more sought after, whereas non-compliant vehicles may become less sought after; and

- Potential changes in housing / business space demand / values.

3. Developing and Assessing the GM CAP pre-Covid-19

3.1 The OBC concluded that a GM-wide CAZ C with supporting measures was the best performing from a range of possible options to achieve compliance in the shortest possible time at the least detrimental impact on GM. These options were assessed against the Government's primary and secondary success factors.

3.2 At the OBC stage, the GM CAP proposed a Clean Air Zone to be implemented across the region in two phases as follows:

- Phase 1 (at the time assumed to be 2021): a Clean Air Zone category B across the region, placing a daily penalty on the most polluting buses, taxis (hackney carriages and Private Hire Vehicles (PHVs)), HGVs and coaches if they travel into, within or through Greater Manchester.

- Phase 2 (at the time assumed to be 2023): expansion to a Clean Air Zone category C across the region, placing a daily penalty on the most polluting Light Goods Vehicles (LGVs) and minibuses if they travel into, within or through Greater Manchester, in addition to those vehicles placed in scope under Phase 1.

3.3 To support the transition from non-compliant to compliant vehicles, a number of Clean Vehicle Funds (Funds) were proposed, to supply financial support for the purchase of compliant vehicles or retrofitting Euro 5 (diesel) vehicles where possible.

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3.4 GM published an appraisal of the GM preferred option for the CAP in the OBC, including a Distributional Impacts Assessment which considered the CAP's impacts on vulnerable groups. Since then, GM has carried out further analysis and research to better understand the potential impacts of the GM CAP on GM's vehicle sectors and economy (pre Covid-19). All papers are available to view via cleanairgm.com[2].

3.5 This evidence base, and feedback to a Conversation held with the public in Spring 2019, was used to inform the development of a detailed package of supporting measures. These measures were set out in the Policy for Consultation, available at cleanairgm.com[3].

3.6 The goal of the Funds is to mitigate the negative economic impacts of the CAZ on those most vulnerable to those impacts, supporting the upgrade to compliant vehicles and the overall success of the CAP in achieving its primary aim. The Funds are targeted at GM's micro and small businesses, sole traders, charities, bus operators and taxi and PHV drivers amongst other groups.

3.7 Analysis conducted to support the case for the Funds suggested that the GM CAP Funds would successfully mitigate the worst impacts and enable a significant proportion of non-compliant vehicle owners to upgrade to a newer, cleaner vehicle, and thus avoid paying the charge. Pre-consultation grant amount derivations are discussed below.

LGV and HGV

3.8 GM's vehicle funding proposals were assessed to identify amounts that could provide adequate mitigation against incurred costs and deliver sufficient upgrade to achieve compliance in the shortest possible time, where this could not be achieved by the CAZ alone.

3.9 For HGVs, the CAZ is forecast to deliver a sufficient upgrade incentive, and support funding would serve as a business cost mitigation measure only. However, LGVs are forecast to require the Funds to achieve the required upgrade level and deliver compliance.

3.10 Funding levels were based on the cost to upgrade to a second-hand compliant vehicle, except for vehicle types where the second-hand market is very limited. Proposed per-vehicle grant funding offers have been designed to provide at least a 10% deposit towards the cost of a second-hand compliant vehicle.

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[2] https://cleanairgm.com/technical-documents/
[3] https://cleanairgm.com/technical-documents/

3.11 A benchmarking exercise was also carried out, to assess existing or proposed schemes in Leeds, Birmingham and London. The goal was to ensure GM's offer is the right amount to meet local needs and circumstances, whilst learning from the experiences of other cities. This helped to inform the pre-Consultation policy specification as identified in Policy for Consultation and the Clean Commercial Vehicle Fund HGV and LGV Case for Measure documents.

3.12 Retrofit is generally assumed to be preferable to replacement for vehicles with a high residual value or where extensive adaptation or branding has been invested in. Therefore, it is assumed that where a retrofit option is available, this will be chosen. A grant amount for retrofitting was broadly set at the cost of the retrofit, based on industry feedback.

Bus

3.13 The retrofit funding amount was calculated as the average retrofit cost submitted by bus operators in Greater Manchester for the DfT funded Clean Bus Technology Fund (CBTF) and from engagement with retrofit suppliers in February 2020.

3.14 The rationale for the proposed replacement Grant offer was based on;

- Equivalence with the CBTF and GM CAP retrofit proposal, ensuring simplicity of the offer; and
- To enable the combined value of the grant amount and the average residual value to meet the minimum deposit requirement for a new bus (typically 10%).

Coach and Minibus

3.15 The coach upgrade grant was identified to cover 10% of the estimated cost for a second-hand compliant coach taking the mid-value of £160,000. This value is also consistent with the support for buses that is offered through the Clean Bus Fund.

3.16 The retrofit funding offer is based upon the typical cost of this option.

3.17 For minibuses, upgrade to a new vehicle was identified to typically cost approximately £40,000. It is anticipated that the availability of second-hand minibuses may be limited, meaning it is likely that owners and operators will have to upgrade to a new vehicle (£5,000 providing over 10% of the value in this instance).

Taxi (Hackney and PHV)

3.18 A range of public and stakeholder engagement exercises have been undertaken in the development of the scheme specification and a similar grant to vehicle upgrade cost approach taken to consider affordability.

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3.19 Grant offers took account of the proposed Minimum Licensing Standards for taxi, as per the concurrent consultation proposal, and therefore provided preferential support for upgrade to Zero Emission Capable (ZEC) and Wheelchair Accessible (WAV) vehicles.

Critical Success Factors (CSFs)

3.20 A set of Critical Success Factors (CSFs), defined at OBC stage, formed the basis for an assessment of the package-level (Funds) options. The CSFs were developed by JAQU and GM to ensure the programme meets the guidelines for local Clean Air Plans, as set by the Government, whilst also meeting regional strategic objectives and avoiding conflict with other proposals.

3.21 It was identified in the post-OBC Case for Measures that each Fund would have a strong beneficial distributional impact, as well as being strongly beneficial from a strategic fit and feasibility perspective. In addition, they were found to be slight beneficial in terms of air quality (except for the Clean Bus Fund, being strong beneficial), value for money and deliverability.

3.22 The degree of beneficial distributional impact has been an important consideration within the proposed updates to the CAP, following the Consultation feedback and review of Covid-19 impacts, discussed in **Section 5** below.

Affordability

3.23 A Distributional Impact Assessment (DIA) was conducted prior to the Consultation. The affordability section of the DIA identified how the CAZ, and in turn the additional Clean Air Fund (CAF) measures, would impact the various demographic and vehicle specific groups from an affordability / financial perspective. It is based upon an assessment of which groups are most impacted by the CAP in terms of financial payments and impacts on business viability and the wider economy.

3.24 The affordability assessment considers two key areas:

- Personal affordability: the direct and secondary impacts of the CAZ – identifying groups which are thought to comprise a disproportionate amount of the population who either own or are employed by the businesses impacted, or comprise a disproportionate amount of the population who are impacted by increased business costs being passed on; and

- Business affordability: the scale of the direct costs (i.e. the need to either pay the charge for non-compliant vehicles or upgrade to a compliant vehicle (where required)). The DIA screening identified all relevant modes (LGVs, HGVs, Buses, Coach and Minibuses, Hackney Carriages and PHVs) with the potential to have impacts for business affordability.

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3.25 The pre-Consultation, pre-pandemic business affordability assessment, as reported in the DIA report, is summarised below:

Table 1 Pre-Consultation Business Affordability Impact Assessment

Social Group / Impact Area	GM CAZ only	GM CAZ + Funds (GM CAP)
LGVs	Large Adverse	Slight Adverse
HGVs	Moderate Adverse	Slight Adverse
Buses	Large Adverse	Slight Adverse
Coach and minibuses	Large Adverse	Slight Adverse
Hackney carriages	Large Adverse	Slight Adverse
PHVs	Large Adverse	Slight Adverse

3.26 The assessment found that while the proposed CAZ was anticipated to have a 'moderate adverse' to 'large adverse' impact on business affordability, the CAF measures were anticipated to reduced this impact to 'slight adverse' across all modes.

3.27 Further to the affordability assessment previously completed, it is reasonable to expect the Covid-19 pandemic will likely accentuate many of the affordability distributional impacts for businesses and individuals, with household and business finances coming under severe pressure.

3.28 This impact from the pandemic may increase as financial support interventions introduced by the UK Government in response to Covid-19 taper off. This is anticipated to be a key area of review in defining the final GM CAP package.

3.29 In particular, considerations which may impact the ability for many individuals and businesses to pay the CAZ charge for non-compliant vehicles or upgrade to a compliant vehicle (where required) are set out in high level form below (note this is not an exhaustive list):

- Change in employment status;
- Extent to which individuals have been furloughed using the Government's Job Retention Scheme (i.e. not receiving full wages);
- Impacts associated with individuals and businesses taking payment holidays on existing loans;
- Impacts attributed to those making use of interest free overdrafts;

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- Requirements to take out additional borrowing. This includes businesses who have made use of support packages / loans offered by Government (i.e. Coronavirus Business Interruption Loan Scheme, Coronavirus Future Fund, the Coronavirus Bounce Back Loan, Covid-19 Corporate Financing Facility) (i.e. propensity and viability for individuals and businesses to further extend credit to upgrade to a compliant vehicle based on the grant offers being made available); and

- Impacts associated with declining business revenues. In particular, the impact on those most sensitive to changes in revenue such as SME which may lead to concerns about defaults on loans, their ability to retain employees and sustaining supply chains.

4. Covid-19 Impacts on GM and the UK

Timeframes

4.1 Covid-19 impacts started to be felt in the UK in early 2020. In response to rising Covid-19 cases in the UK, non-essential travel and contact was called to a halt by the Prime Minister on 16th March 2020, with a first national lockdown legally coming into force on 26th March (L1 in ***Figure 1*** below).

4.2 Measures were eased from 10th May through the summer of 2020 (E1), but cases began to increase again in early Autumn. Local tiered restrictions in GM were reinforced from September (T1) and a second national lockdown was introduced on the 5th of November 2020 (L2). After brief respite in measures for some areas, including mixing of households over Christmas (T2), a third national lockdown began on 6th January 2021 (L3).

4.3 With the introduction of vaccines at the end of 2020 and successful social distancing policies, cases have fallen rapidly in 2021. Further to this, restrictions have been gradually lifted in England from 12th April 2021 (E2), towards a planned removal of most restrictions by 21st June 2021, although this has now been delayed to 19th July 2021 and remains under review.

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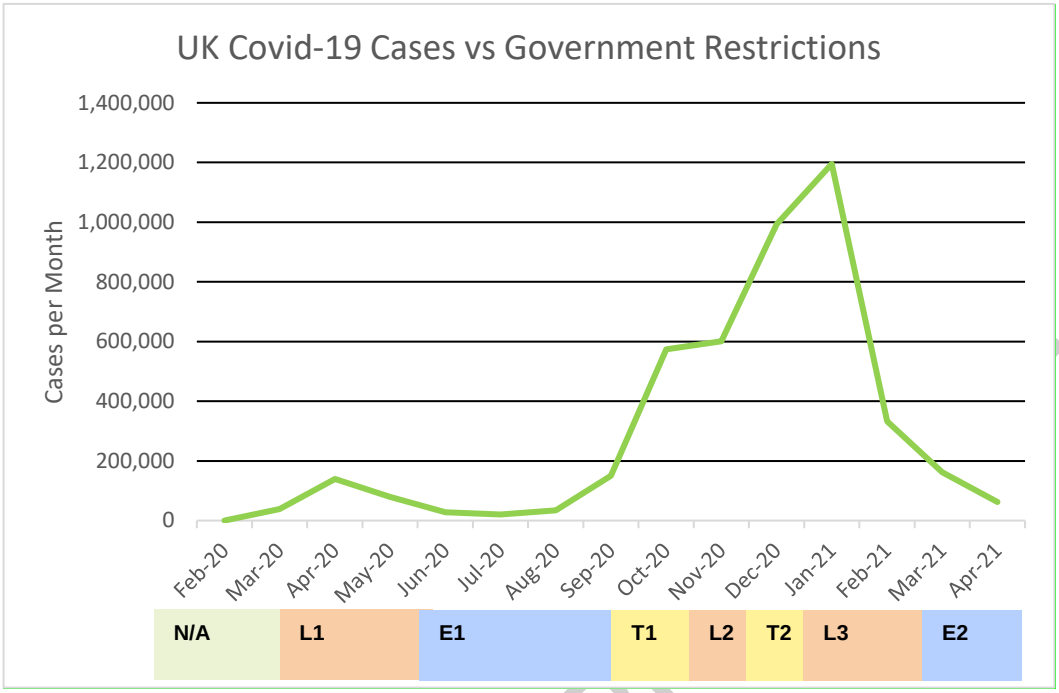
Figure 1 UK Covid-19 Cases and Government Restrictions



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Economic Impacts during Covid-19

4.4 Covid-19 has had a huge impact on the country as a whole, and the North West and GM are no exception to this. GM has been under some of the strictest lockdown measures for a longer period than other parts of the UK, due in part to local socio-economic circumstances, including a greater than average proportion of employees who can't work from home and dwellings of high multiple occupancy and density.

4.5 Over the same period, Britain has left the European Union, bringing uncertainty over the UK's future relationship with the European Union until an agreement was reached, and outturn changes to the movement of people and goods.

4.6 The Institute for Government, a think-tank, published *The cost of Covid-19: The impact of coronavirus on the UK's public finances* report, to calculate the cost of the pandemic by assessing the impact on public finances, using government data for the 2020/21 financial year to September 2020.

4.7 Some of the core findings from the report include:

- Public borrowing in 2020/21 will be £317.4bn above the government's plans. This is the effective 'cost of Covid-19' so far to the public finances in the current year;
- The majority of this (£192.3bn) is the result of specific policy decisions taken by the government, including measures to try to insulate households and businesses from the worst of the crisis;

- The government's decision to support businesses and households through Covid-19 means, was estimated to have absorbed nearly two thirds (64.5%) of the pandemic's hit to the private sector; and

- Reduced output has also hit tax revenues and led to higher welfare spending, pushing planned borrowing up by a further £125bn.

4.8 The UK unemployment rate, in the three months to January 2021, was estimated at 5.0%, 1.1 percentage points higher than a year earlier and 0.1 percentage points higher than the previous quarter. It is expected to peak at around 6.5% in late 2021 before subsiding, based on OBR March 2021 forecasts[4].

4.9 At a more local level, GM has carried out a programme of analysis to better understand the impacts of Covid-19 on vehicle owners affected by the GM CAP. Collated evidence and results of this analysis are set out in *Impact of Covid-19 Report*. GM also asked respondents to the Consultation to describe how the pandemic had affected their ability to respond to the GM CAP.

4.10 Analysis of cash reserves for GM businesses, based on Growth Company survey data show in April 2020, only 18.3% of businesses considered they had sufficient reserves for more than six months. This situation improved with the introduction of Government support and more recently, a reduction in cases and confidence in an end to Covid-related restrictions, increasing to 64% of GM businesses. However, reviewing responses by business size, this figure is lower for micro and small businesses (42% and 61% respectively).

4.11 Decision Maker Panel (DMP) survey data for UK business leaders, show that across business sectors there are differing expectations for the economic recovery through 2021 and beyond. For transport of general goods there is anticipated positive sales growth in the second quarter of 2021, but the Accommodation and Food sector is anticipated to take longer to recover.

4.12 Looking at the type of services which have experienced the greatest drop in turnover relative to the previous year, based on ONS data, there is considerable variation, as shown in the ONS turnover data summarised within **Table 2**.

4.13 Certain activities such as household repairs have remained steady as they are essential functions, as is the transport of food for supermarkets. However, the transport of food and drinks, specifically for hospitality, and the transport of people for business and leisure have experienced significant decreases in turnover.

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[4] https://obr.uk/download/economic-and-fiscal-outlook-march-2021/

Table 2 ONS Turnover by Service Type – 2020/21 Relative to 2019/20

Travel agency, tour operator & other reservation services and related services	15%
Accommodation services	37%
Creative, arts and entertainment services	46%
Food & beverage serving services	48%
Other personal services	62%
Library, archive, museum and other cultural services	62%
Sporting services and amusement and recreation services	62%
Wholesale trade services, except of motor vehicles & motorcycles	82%
Wholesale & retail trade & repair of motor vehicles & motorcycles	82%
Rail and land transport services & transport services via pipelines	85%
Rental & leasing services	86%
Cleaning activities	87%
Security & investigation services	93%
Warehousing and support services for transportation	96%
Repair services of computers and personal and household goods	100%
Real estate activities on a fee or contract basis	104%
Postal and courier services	115%

Impact of Covid-19 on in-scope vehicle owners

4.14 Analysis has been undertaken to understand impacts of Covid-19 by vehicle type, and to assess how vulnerable each vehicle type is to the impacts of the GM CAP. This is discussed further within the *Impact of Covid-19 Report* and findings are summarised here:

- HGVs and LGVs, in some sectors, have been able to operate close to normal and may have gained growth opportunities as a result of the pandemic. They are likely to be in a similar position as envisaged pre-pandemic.

- There have been no specific restrictions placed on HGV operations, due to Covid-19, and a significant proportion of HGV activity has been classified as 'essential' throughout and has been able to continue uninterrupted. This is reflected in the traffic statistics which show that HGV activity was at 62% of normal levels during the initial lockdown period, higher than any other mode, and then recovered quickly, with near-normal traffic flows by July. By September 2020, HGV activity was exceeding normal levels.

- LGVs in sectors that have been more affected by the pandemic (such as hospitality and non-essential shops, as shown in **Table 2**) have experienced periods of closure, reduced turnover and profits, and may have delayed planned vehicle purchases. However, there has been increased demand for household deliveries through online shopping.

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- Buses have experienced a substantial drop in passenger demand and therefore revenues (in particular during school closures and full lockdowns), and there is evidence of delays to capital expenditure on new buses as well as reduced production of new vehicles. Nevertheless, high levels of Government subsidy to maintain service levels have reduced the impact of the pandemic on this sector.

- In contrast, passenger vehicles not in receipt of bespoke public subsidy, such as taxi and coach, have experienced a very substantial drop in demand, with long periods of closure or low operations and consequent revenue losses.

- Demand for coach and minibus services has been very substantially reduced due to travel restrictions and restrictions on other activities served by the sector such shopping and leisure, events and tourism. Demand for taxi services has been affected by the reduction in rail and air travel in particular.

- Many vehicles in this sector are privately owned or secured against people's homes, and a relatively high proportion of the fleet is non-compliant.

- Demand for coach and minibus services has been very substantially reduced due to travel restrictions and restrictions on other activities served by the sector such shopping and leisure, events and tourism. They have been impacted both in terms of leisure travellers and business travellers, fixed service (school services) and private hire.

4.15 It is clear that whilst most vehicle owners experienced a sharp drop in operations in the first six weeks of lockdown, the recovery and consequential impact has varied by vehicle type and business sector. This has impacted the CAP Consultation feedback which is discussed further within this note. Looking forwards, there will be continued variation by both of these aspects and there will be a need to account for it through proposed changes to the CAP, as discussed in **Section 5**.

Impact of Covid-19 on the GM population employment and financial circumstances

4.16 GMCA analysis of ONS unemployment data suggests:

- The North West experienced a relatively large fall in employment compared with other English regions. Only the East Midlands and South West have experienced more significant drops;

- Over recent months, the North West has experienced different patterns of labour market change to the UK: with more rapid increases in people moving into economic inactivity (i.e. people not working and not looking for work);

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- However, the most recent data suggests the North West is moving back into line with national norms. It suggests people are moving out of inactivity and back into seeking employment;

- In the early months of the pandemic, unemployment claims from 16-24 year olds grew quickly, and have risen again in the latest data;

- Whilst young men in their twenties and thirties certainly appear to be dramatically affected, other age and gender cohorts are not far behind;

- There also appears to have been relatively rapid increases among 25-49 year old claimants between January and February 2021; and

- By gender, male unemployment has fluctuated up and down again since April 2020, whereas female unemployment has steadily increased.

4.17 GMCA analysis of the Greater Manchester Population Survey[5] shows:

- 2 in 5 (40%) of those in employment in February 2021 were furloughed, on reduced hours, or reduced pay. This is a 6% increase since December.

- The peak of furlough in GM was in July 2020, at over 213,000 people, reaching a low level in October of 104,000 before increasing to 185,000 in January 2021.

- Increased proportions of respondents are concerned about their mental health, employment situation and their finances in early 2021 than in November.

- These feelings have been accompanied by a significant increase in financial impacts being reported since December. Higher proportions say they or someone in their household has lost their job (23%) and/or needed to borrow extra money (20%).

4.18 Bank of England analysis in November[6] suggested that high-income households[7] and retirees are more likely to have increased their savings during the pandemic, relative to low income and furloughed workers whose savings were more likely to have decreased.

[5] https://www.greatermanchester-ca.gov.uk/media/4361/20210325_gm-covid-survey-report4update.pdf
[6] https://www.bankofengland.co.uk/bank-overground/2020/how-has-covid-affected-household-savings
[7] Notes: High-income employed households are households where the main earner is either employed or self-employed and the household income is in the top quintile; middle-income employed households are households where the main earner is either employed or self-employed and the household income is in the third or fourth quintile, and low-income employed households are households where the main earner is either employed or self-employed and the household income is in one of the bottom two quintiles. Retirees are households where the main earner is retired.

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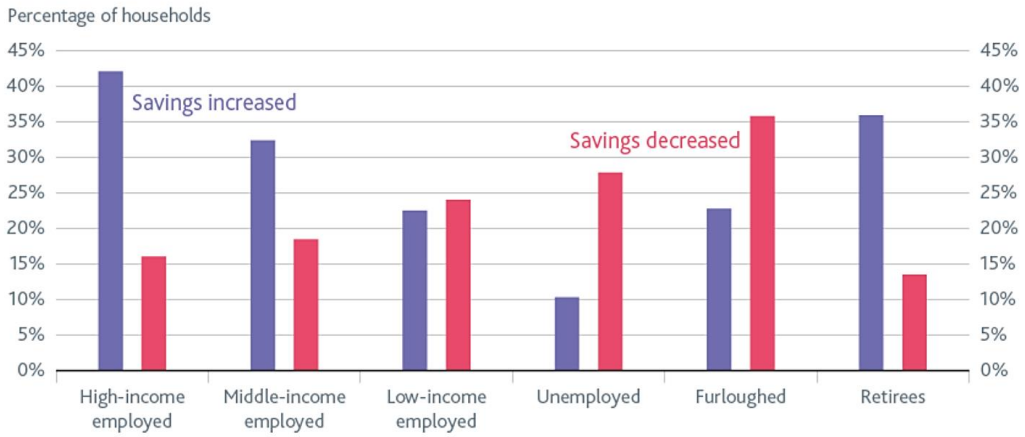
Figure 2 Bank of England estimates of Increased / Decreased household savings during Covid-19 (November 2020)



4.19 The Greater Manchester Independent Inequalities Commission report, *The Next Level: Good Lives for All in Greater Manchester*[8] identifies; "Covid-19 has exposed the deadly consequences of inequalities and research confirms that the health and economic impacts of the pandemic are falling on those already experiencing inequalities, widening those inequalities further." It highlights the following groups being particularly impacted:

- Of those who contracted Covid-19, death rates for people of Black African or Black Caribbean ethnicity were more than twice as high as for White people;
- Black and Asian men were the most likely to have jobs which put them at greater risk of Covid-19 exposure;
- People from Pakistani, Bangladeshi, Chinese or Other Asian ethnicities were more likely than White British people to worry about their future financial situation, due to the nature of their work and impact on take-home pay;
- Multi-generational households have also been impacted significantly, due to the difficulty in shielding older residents; and
- Disabled people have experienced greater health and mortality risks than non-disabled people, in particular those with learning disabilities.

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[8] https://www.greatermanchester-ca.gov.uk/media/4337/gmca_independent-inequalities-commission_v15.pdf

GM CAP Consultation Feedback

4.20 Consultation survey responses to the GM CAP proposals have highlighted the extent to which particular groups of people have concerns over the costs associated with upgrading to a cleaner, compliant vehicle.

4.21 76% of businesses and 79% of taxis (operators, owners or drivers) responding to the consultations had been financially impacted by Covid-19. Of those identifying as being impacted, the table below identifies the type of impact.

Table 3 Financial impact of Covid-19

Financial effect	Level of debt increased	Reserves / Savings reduced	Turnover lower	Profitability lower
Business	60%	75%	89%	84%
Taxi	71%	65%	82%	81%
Organisation	63%	67%	83%	71%

Base: all respondents financially impacted by Covid-19

4.22 Feedback from the Consultation indicates that the pandemic has meant many businesses and sole traders have experienced lower turnover and profits and left them more indebted, with depleted savings/reserves, and with capital investment (including in vehicle upgrades) delayed or on hold. However, the distribution of this adverse impact has not been balanced.

4.23 Of those respondents identifying as being financially impacted by Covid-19;

- PHV and HGV had the greatest proportion with increased levels of debt;
- Hackney carriage and HGV had the greatest proportion with reduced reserves / savings;
- All coach responders identified a lower turnover; and
- Bus operators were most likely to experience reduced profitability.

4.24 In terms of additional written comments in the survey feedback;

- 52% of coach operators provided written comments on their concerns over increased financial pressure / reduced income as a result of Covid-19, followed by Hackney Carriage (39%), HGV and PHV operators (both 32%).
- Small businesses were the most vocal (42%), although other business sizes were not far behind, with large business (29%) and sole traders (32%) being the least vocal in terms of providing written comments.

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4.25 Reviewing the broader Consultation impact of the CAP related responses by vehicle type, the following themes have been identified:

- Public transport operators were most vocal about concerns over costs being transferred onto the public. Just under a third of bus driver / owner comments related to this, and a quarter of coach and minibus comments. However, it is noted that the GM CAP consultation exercise started prior to the recent GM bus franchising consultation which was held from 2nd December 2020 to 29th January 2021. There was overwhelming public support for the bus franchising proposal. Further information on bus franchising can be found detailed within the Bus Franchising in Greater Manchester (March 2021) Consultation Report[9].

- Coach and HGV operators were the vehicle owners most concerned about the impact on business operations.

- Coach, HGV, LGV and Hackney Carriage operators were the most concerned about business viability.

- Concerns were raised by Leisure vehicle owners over the impact on personal hobbies / activities.

4.26 Reviewing the consultation responses by business size, the following broad trends have been identified:

- Businesses of different sizes are concerned they will experience a negative business impact, albeit to varying extents.

- Generally, the smaller the business, the more difficult it appeared for non-compliant vehicle owners to upgrade their vehicle.

- Smaller businesses are the most concerned about business viability / job losses, though medium sized business express similar concerns.

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[9] https://democracy.greatermanchester-ca.gov.uk/documents/s13780/Appendix%201%20-%20TfGMs%20March%202021%20Consultation%20Report.pdf

Post Consultation Equality Impact Assessment

4.27 In assessing the equality impacts of the GM CAP, the impacts of Covid-19 are acknowledged as likely to make some of the protected characteristics more vulnerable to the unintended consequences of the CAZ. However, data to support quantification of this effect are not identified to be sufficiently available for the purpose of the post-Consultation GM CAP Equalities Impact Assessment (EqIA), whilst it is acknowledged that Covid-19 will exacerbate identified equality impacts. The EqIA does however highlight there is expected to be an adverse affordability impact for sectors which have been most affected by Covid-19, which is planned to be mitigated through changes in the proposed post-Consultation changes to the CAP.

4.28 The post-Consultation GM CAP EqIA identifies that the CAZ will result in cases of increased cost of travel to places of work, education, social/leisure activities. This will be mitigated from being a 'Medium' to a 'Low' population exposure impact through the CAF Measures. This impact is anticipated to disproportionately affect younger and older people as well as those with a disability.

4.29 Similarly, the EqIA identifies there will be cases of increased business costs, which will be mitigated from 'High' to 'Medium' impact through the CAF Measures. Small businesses (including microbusinesses and sole traders) are identified as being more vulnerable in terms of business affordability to the CAZ charges. Taxi drivers are predominantly male and there is a greater than proportionate number of BAME drivers. There is concern amongst older drivers that they would have insufficient working timeframes to obtain / pay back finance.

4.30 The post consultation EqIA summarises the following anticipated impacts at a business and personal (individual) level:

Business affordability mitigation

- The suite of CAP funding measures will mitigate the extent of adverse impacts the CAZ will place on business owners – both individuals and operators of small and large fleets. However, there will still, inevitably, be a cost involved, which would most likely be felt disproportionately by individuals and small businesses especially those where their fleets make up a large portion of the company assets.

- The finance related mitigation measures may not be effective for older business owners for whom (as mentioned above) the offered finance options would not be considered an appropriate investment given the short time remaining until retirement and the reduced pay-back time.

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Personal affordability mitigation

- The funding measures aimed at mitigating impacts on businesses will also indirectly mitigate the adverse impacts on personal affordability. This is because the likelihood of fare increases is reduced as businesses are more likely to be able to finance the upgrade to compliant vehicles without needing to pass additional costs onto customers or ending business.

4.31 The anticipated exacerbation of identified equality impacts post Covid-19, and in particular the affordability concerns for specific business, suggests a case for a standalone Hardship Fund which can provide additional support to those businesses in greatest need.

Economic Impacts post Covid-19

4.32 There remains considerable uncertainty around the timeframe for the 'end' of Covid-19. Many consider it to eventually be treated similar to flu, with those at risk being given annual boosters in response to variants. While the situation in the UK is broadly looking positive (though with spikes of variants in Bolton at the time of writing, in May 2021), the global vaccination rollout and return to 'normal' is a long way behind, with many countries vaccinating at a rate significantly below that required for all of their adult population within one year.

4.33 That said, there is anticipated to be a general upturn to economic output based on Government forecasts. The March 2021 OBR central forecast is predicting GDP to have returned to 2019 levels by 2022, reducing down towards a pre-Covid-19 growth rate towards the end of 2022. The long-term forecast is for a lasting relative reduction in GDP relative to pre-Covid-19 forecast of approximately 3%.

4.34 There is however expected to be a longer-term impact in terms of unemployment. The OBR forecast unemployment to peak in 2022 at 6.5%-7%, up from 4% in 2019. This compares to a peak of 11.7% in 1984, a peak of 10.4% in 1993 and 8.1% in 2011. This suggests there is not anticipated to be similar unemployment levels as experienced in previous recessions, however, there will be a large budget correction following the cost of Covid-19, which will impact Government spending and tax rates. Given the ongoing uncertainty around Covid-19 and the economy in general, it may also exacerbate the trend towards zero-hour contracts and potential under-employment, altering the interpretation of the headline employment and unemployment percentages.

4.35 GM businesses have had significant levels of financial support, aiding short-term survival, but the increase in debt and dependency creates huge risk at scheme end.

4.36 At January 2021, £2.7bn had been borrowed by GM businesses from the Coronavirus Business Interruption Loan Scheme (CBILS) and Bounce Back Loan Scheme (BBLS) schemes alone. This equates to (as examples);

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- Over £354m additional business debt in Salford;
- Over £592m additional business debt in Manchester; and
- Over £192m additional business debt in Bolton.

4.37 In addition, there has been;

- £3.2bn in furlough payments to employees in the North West;
- £178m in payments to self-employed people in the North West; and
- £550m in grants to businesses paid by GM local authorities.

4.38 Significant Covid-19 related risks and uncertainty which may impact people and residents within GM include:

- Unemployment being higher than forecast and/or concentrated on particular groups;
- The increased shift into 'economic inactivity' in the North West creates long-term scarring;
- High levels of business debt act as a medium or long-term drag on a significant number of businesses, or result in insolvencies and business failure;
- High levels of business debt reduce impact of tax incentives to increase capital investment;
- The impacts on certain areas are longer lasting, e.g. because of the increase in home working or a concentration of jobs that rely on international travel;
- The modest average impact on household finances hides a very wide distribution of effects. Some groups may come out of the crisis better off, but others even worse off. Based on the Bank of England data, lower income households and deprived areas are more likely to fall into the latter; and
- Worsening of long-term and entrenched inequalities (including health inequalities).

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5. GM CAP Revisions to Take Account of Covid-19

5.1 The pandemic has highlighted the importance of air quality on public health, as long-term exposure to air pollution has been linked to an increased risk of dying from Covid-19.

5.2 With consideration to the impacts of Covid-19 and the feedback received through the public consultation, GM has revised its proposals. Whilst key changes are summarised below, the full response to the Consultation and revised policy as documented within the *GM Authorities Response to Consultation* report provide further detail.

5.3 Revisions to some of the grant / finance amounts have been proposed. Significant changes include:

- An increase of the maximum Coach grant from £16,000 to £32,000.

  This will help to mitigate the significant Covid-19 impact identified within the Consultation feedback and wider impact analysis. It is proposed that the replacement grant would only be available for coach models that have no retrofit solution.

- An increase in maximum HGV grants by vehicle size, including an upper limit increase from £5,500 to £12,000 for some vehicles.

  The changes in grant values will reduce the cost burden to HGV owners through recognition of the impact of Covid-19 on the industry and to mitigate against the risk of lower funding uptake. The replacement grant values will remain variable by vehicle weight, recognising the large variations in the cost of HGVs.

- An increase in grants for LGVs greater than (or equal to) 3.5 tonnes in weight, from £3,500 to £4,500.

  The LGV replacement grant value is proposed to be uplifted depending on the weight of the vehicle, which will support larger vehicle owners which have experienced greater levels of indebtedness during Covid-19. A retrofit option has also been added for greater flexibility in achieving vehicle compliance.

- An increase in Hackney / PHV grants for non-WAV vehicles to £3,000 for compliant non-WAVs and £6,000 for ZEC non-WAVs and new grants for WAV vehicles offering £5,000 for a compliant WAV and supporting upgrade to a second-hand ZEC WAV.

  Consultation feedback and GM CAP evidence on Covid-19 impacts demonstrates that the taxi industry has been significantly impacted by the pandemic. This increased grant amounts for types of Hackney upgrade provides increased support and flexibility of response for non-compliant vehicle owners.

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- Introduction of new retrofit grants for LGV, Minibus, Hackney and PHV of £5,000 per vehicle.

  This will help to provide greater flexibility and potential to reduce the cost burden, assisting in particular where a vehicle is retrofittable and would experience additional costs due to the existing vehicle-specific customisation costs, such as interior fittings or liveries.

- Planned temporary exemptions extended from December 2022 to May 2023 and extended to all LGVs, minibuses, coaches and GM-licensed Hackney Cabs and PHVs, additional exemptions for bus operators operating some school bus services and driver training buses and broadening of discounts for private HGVs.

  These changes will provide a greater amount of time between the peak/end of the pandemic and the introduction of applicable CAZ charges.

- Any private HGV (licensed under the Private HGV Tax Class) to have a discounted charge of £10 per day (as opposed to the standard HGV rate of £60).

  This will help to mitigate the personal cost impacts of Covid-19.

5.4 In addition to these changes, the option for a broader, more flexible Hardship Fund has been identified as a valuable addition to the overall package following the Consultation feedback and with respect to the impact of Covid-19. While the proposed changes to grant / finance levels and exemptions will help mitigate the affordability impacts of the CAZ for most users, the analysis summarised above highlights the variability at a business type and individual level, and the benefit of a measure which can support those experiencing greatest difficulty in adapting to the CAZ requirements.

6. Economic Implications of the GM CAP Post-Pandemic – allowing for the proposed revisions

6.1 Despite the implementation of furlough and other local and national support measures, Covid-19 will leave patches of economic scarring.

6.2 The CAP is a strategic plan which will provide funding support at discrete levels for practical operation purposes. But there will be a range of funding ‘need’ for non-compliant vehicles owners, depending on individual circumstances, such as age of vehicles and the variation against their previous business operation which the CAP introduces.

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6.3 The pre-Consultation funding was broadly designed such that recipients of support would receive sufficient funding to support them to upgrade their vehicles or offset the costs of retrofitting. The proposed revisions to some CAP elements post Consultation help to mitigate the Covid-19 impacts. The pre-Consultation Distributional Impact Assessment categorised the GM CAZ (not including the supporting Funds) as having a 'large adverse' impact on all commercial vehicle types, apart from HGV which was described as 'moderate adverse'. Small businesses (including sole trader and micro businesses) were highlighted as being particularly impacted. With the addition of the Funds, these impacts were reduced to 'slight adverse' for each vehicle type.

6.4 The proposed extension to the temporary exemptions from December 2022 to May 2023 provide additional time for Coach, LGV, Minibus, Hackney and PHV operators to recover lost cash reserves post Covid-19. It also enables the growth of the compliant second-hand vehicle market for these vehicle types and provides more time for businesses to adapt their business plans.

6.5 The proposed increases to financial support benefit coach and HGV operators, doubling their grant amounts, bringing their grant to new vehicle price proportions to above 10% in most cases, and the grant to second-hand vehicle funding gaps to 40% or more in most cases.

6.6 LGV operators of larger vans now have an increased grant per vehicle amount, close to 20% of a new vehicle price and a funding gap to second-hand proportion of up to 50%. This will provide additional support to affected small businesses. They also benefit from the new retrofit grants, which provides a very low cost route to compliance for those with a retrofittable vehicle.

6.7 Given the de-coupling of Minimum Licensing Standards (MLS) with CAP, a wider range of financial support for Hackneys is proposed, including £3,000 and £5,000 diesel option grant for non-WAV (wheelchair accessible vehicle) and WAV vehicle types respectively. The £10,000 running costs grant is retained for ZEC WAVs.

6.8 PHVs benefit from increased financial support for both diesel and ZEC vehicles, the latter more than offsetting the reduction in Government grants for ZEC cars, and bringing the grant to new vehicle price closer to 20%.

6.9 Bus grant levels remain the same, given the higher level of Government support to date and the large proportion of vehicles which can be retrofitted.

6.10 Minibus grant levels also remain the same, given the existing grant to new vehicle proportion of over 20% and grant to second-hand vehicle funding gap proportion of over 40%. However, it is acknowledged that although a number of minibus operators will be exempt, remaining ones which cater for groups most severely impacted by Covid-19, may experience a more prolonged cashflow impact.

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7. Conclusions

7.1 With the above changes to grant / finance amounts, it is concluded overall, the business impacts of the CAP are anticipated to return broadly to 'slight adverse' ranking in regards to the DIA affordability categorisation, when the proposed changes to the grant / finance amounts, discounts and exemptions are included. However, there remains variation on an individual business level and this will likely be exacerbated by Covid-19.

7.2 Whilst financial support is targeted towards those most in need; sole traders, micro and small businesses within the GM boundary, it is noted that there will also be impacts on medium and to a lesser extent, larger businesses. Similarly, there will be varying degrees of impact on businesses based outside of GM, in particular those which are close to the boundary or operate frequently within GM.

7.3 From the Government Clean Air Fund of £260m for the CAPs across the country, GM have secured for more than £120m of funding for eligible local people and businesses to move to cleaner, compliant vehicles, before the CAZ is introduced. The CAP cannot remove all individual costs associated with the CAZ, and the primary goal of the CAP is to achieve NO_2 compliance in line with the legal duty under the Ministerial direction.

7.4 Furthermore, some vehicle owners will have been disproportionately affected by the pandemic compared to others with the same vehicle and operating in the same sector. For example, some will have had to shield themselves or family members, others may have been in a more precarious position for example if they had recently made a major investment on the basis of expected business, or may not have qualified for Government support.

7.5 The GM CAP was devised in a pre-Covid-19 world. Where possible, JAQU funding and guidance has been stretched to accommodate the new circumstances, through adjustments to the Clean Vehicle Funds and other aspects of the CAP. But the impacts of Covid-19 have been significant to date and will continue to have a bearing on business operations to varying extents in the medium to long-term. Those impacts and the uncertainty around individual circumstances and the UK economy as a whole, suggest that there will be a greater number of businesses operating under significant financial pressure relative to the pre-Covid-19 scenario.

7.6 The impact of Covid-19 therefore, supports the case for a more flexible Hardship Fund, which can adapt to the outturn micro-economic and localised impacts of Covid-19, where there remains considerable uncertainty.

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7.7 Although feedback from the consultation and the impact of COVID-19 research found that further support was required for GM businesses, Government Ministers do not agree that a Hardship Fund is the best way to mitigate the impact of uncertainty due to the pandemic. Ministers cite other Covid-response government schemes (not specific to Clean Air Plans) being available to address wider business impacts. However, Government have confirmed that they wish to ensure that Clean Air Funds can be adapted if necessary; and, that they will continue to work with GM to collectively understand the situation, including the funding position, if the impacts prove to be more severe than forecast. Joint Air Quality Unit (JAQU) officials have agreed that a mechanism for this assessment will be agreed in advance of the funds opening in November 21.

7.8 As further funding to address potential cases of hardship may be needed, Greater Manchester Authorities will be monitoring the situation very closely to ensure that they can take up the Government's offer to review the need for further funding if the need can be objectively demonstrated.

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Greater Manchester's Clean Air Plan to Tackle Nitrogen Dioxide Exceedances at the Roadside

Appendix 8: Other Cities' Clean Air Plans

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Version Status:	Draft for approval	**Prepared by:**	Transport for Greater Manchester on behalf of the 10 Local Authorities of Greater Manchester
Date:	20 June 2021		

1.1 This document provides a summary on other Clean Air Plans and their latest status.

1.2 Since the last GMCA report to members in January 2021, two Clean Air Zones (CAZ) have gone live and there have been significant updates on the progress of other cities' plans to implement Clean Air Zones.

1.3 Bath & North East Somerset launched their Clean Air Zone, a city centre CAZ category C, on 15 March 2021. This was initially due to launch in November 2020 but was delayed by the COVID-19 pandemic.

1.4 Birmingham launched their Clean Air Zone on 1 June 2021. However, the council did not require drivers to pay the daily fee until 14 June 2021. This approach was adopted to provide those with non-compliant vehicles with a little extra time to get ready, review the support available and to consider the alternatives to driving through the Clean Air Zone. The scheme, which is a city centre CAZ category D, was initially due to launch in January 2020 but was delayed by issues with the Government's vehicle checker and then by impacts of the COVID-19 pandemic. Prior to launch, Birmingham opened up their clean vehicle funds to enable impacted groups to access funding and upgrade their vehicle prior to the scheme's launch.

1.5 Bristol consulted on their city centre Clean Air Zone proposals between 8 October and 13 December 2020. The Full Business Case was submitted to Government on 26 February. Bristol plan for a CAZ to be in place by 29 October 2021 at the latest.

1.6 Portsmouth's CAZ B is expected to go live in November 2021. The city centre scheme will charge buses, coaches, Hackney Carriages, private hire vehicles and HGVs who drive in the CAZ B boundary.

1.7 Other Clean Air Zones are expected in Bradford, Tyneside, Sheffield and Liverpool.

1.8 London's Ultra Low Emissions Zone (ULEZ), although not required under the same legislation as local authority clean air plans which are part of the Clean Air Zone Framework but has similar principles of charging the most polluting vehicles, is to be extended to the North and South Circular roads of inner London on 25 October 2021.

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Greater Manchester's Clean Air Plan to Tackle Nitrogen Dioxide Exceedances at the Roadside

Appendix 9 - Compliance with the Secretary of State's Direction

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Version Status:	DRAFT FOR APPROVAL	**Prepared by:**	Transport for Greater Manchester on behalf of the 10 Local Authorities of Greater Manchester
Date:	20 June 2021		

1 APPENDIX 9 – COMPLIANCE WITH THE SECRETARY OF STATE'S DIRECTION

1.1 This appendix sets out how the proposals meet the requirements of the Ministerial Direction.

Background to the Direction issued in March 2020

1.2 The Direction issued by the Secretary of State in March 2020 requires the 10 GM local authorities to implement their local plan for NO_2 compliance which involves a Charging Clean Air Zone Class C with additional measures.

1.3 As part of the Outline Business Case (submitted to the Joint Air Quality Unit (JAQU)) in March 2019) an options appraisal analysis was undertaken. This included, in addition to a GM-wide CAZ C (Option 8), consideration among other options, for example, of a GM-wide CAZ D along with consideration of a CAZ C with a CAZ D in the Inner Ring Road (IRR).

1.4 This analysis followed guidance issued by the Joint Air Quality Unit (JAQU) for local authorities implementing a Clean Air Zone. It concluded that a GM-wide CAZ D was not one of the three best–performing measures that would be taken forward for further, more detailed appraisal. The basis for this decision is set out in the Strategic Case and the Options Appraisal Report, in particular paragraphs 8.6 - 8.11. It was considered unlikely that a GM-wide CAZ D could be delivered by 2021, and therefore this approach presented a risk that no real improvements to air quality would be achieved for some time as well as leaving the compliance date highly uncertain (paragraph 8.7). The conclusion was reached, therefore, that this option would not deliver compliance in the shortest possible time and that it would perform even more poorly in terms of reducing human exposure, as there would be a long period without action on the ground, during which time considerable progress towards compliance would be expected for the other options.

1.5 Two of the three best performing options that were taken forward for further, more detailed appraisal included charging non-compliant cars in the regional centre, namely option 5(i) (CAZ D in the IRR); and option 5(ii) (CAZ D in the IRR and charging all diesel vehicles). However, options 5(i) and 5(ii) did not bring forward compliance with the legal limit for nitrogen dioxide in Greater Manchester quicker than the preferred option (option 8), but at the same time – in 2024.

1.6 Comparing the three Options 5(i), 5(ii) and 8 showed that in 2021, all 3 Options reduced the number of exceedances above the legal limit by between 70% to 80%, with Option 5(ii) delivering the greatest emissions benefit in the first year. By 2023, all sites would be near compliance with all Options, with a maximum of three non-compliant sites predicted, and the three Options were all forecast to deliver compliance in the same year, 2024. The impact on human exposure over the lifetime of the Plan (assumed to be 2021 to 2024) was similar with all Options; and all delivered emissions reductions and reductions in concentrations region-wide and avoided or mostly avoided the risk of redistributing concentrations.

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1.7 Options 5(i) and 5(ii) include a CAZ Category D within the IRR bringing cars into scope for the scheme. This was considered because the city centre contains the highest density of sites in exceedance and many of the sites with the highest concentrations. As such it was thought that such a scheme would be necessary to deliver compliance within Greater Manchester in the shortest possible time. However, the analysis suggested that the last sites to become compliant were on or just outside the IRR and therefore that compliance with the legal limit for nitrogen dioxide within Greater Manchester was not ultimately determined by concentrations in the city centre. Consequently, although Options 5(i) and 5(ii) would bring greater benefits in terms of emissions reductions, particularly in the opening year, these were not as distinct as anticipated. Fundamentally, the analysis suggested that a city centre CAZ D did not bring forward the year of compliance despite bringing more people in scope for a charge including private car drivers going to work or to visit the retail and leisure destinations in the city centre.

1.8 It would have been reasonable to conclude simply from the modelling carried out that there was greater certainty in the estimated year of compliance for Options 5(i) and particularly 5(ii), as they consistently delivered lower concentrations in the modelled years. However, their delivery is subject to significant risks that make achieving compliance within Greater Manchester in the shortest possible time less likely. Options 5(i) and 5(ii) involve implementing an additional CAZ that involves private cars, alongside the region-wide CAZ proposed in all three Options. This creates challenges in terms of obtaining approvals and managing risks, and of deliverability, in terms of the achievability of delivering proposals of this scale, and of obtaining the necessary human and financial resources. Option 5(ii) carried additional risk of failure due to its innovative nature. Due to a lack of evidence on the effectiveness and impacts of such a proposal, forecasts for this option were considered particularly uncertain. Option 8 presented many delivery challenges, but was more feasible and achievable than Options 5(i) and 5(ii) and thus also offered greater confidence that compliance can be achieved in the shortest possible time.

1.9 It was also considered that Options 5(i) and 5(ii) might cause unacceptable and significant unintended consequences and distributional impacts, particularly in terms of the impact on affordability for residents, the impact on the local economy, and the impact on the quality of life of local residents. There were particular concerns in terms of the potential impacts on low income car dependent workers, small businesses, and city centre retail. Option 8 delivered compliance in the same year without the same potential risk of damaging economic impacts.

1.10 On balance, therefore, it was considered that Option 8, whilst remaining a substantial and complex undertaking, was the surest way of delivering compliance in the shortest possible time, providing considerable health benefits at the lowest cost to society and the economy, of the three Options.

1.11 In July 2019 the Secretary of State issued a direction under section 85 of the Environment Act 1995 requiring the 10 GM local authorities to implement the local plan for NO_2 compliance for the areas for which they were responsible, involving a Charging Clean Air Zone Class C with additional measures, but with an obligation

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to provide further options appraisal to demonstrate the applicable class of charging clean air zone and other matters to provide assurance that the local plan would deliver compliance in the shortest possible time and by 2024 at the latest.

1.12 Following this Direction ClientEarth wrote contending that the option chosen did not reflect its interpretation of the duties imposed on the Secretary of State by EU law.

1.13 JAQU's approach was that, in selecting an option among those which may achieve compliance on the same date, reduction of human exposure in the interim was a factor to be scored and weighed appropriately when applying Critical Success Factors (CSF) when comparing the options: it did not of itself necessarily determine which of those options should be selected. JAQU's guidance adopts, at para 2.3, a single primary pass/fail CSF (i.e. compliance in the shortest possible time) and treats reduction in human exposure as part of the secondary CSF theme of "strategic and wider air quality fit", one of a number of themes which include value for money, affordability and distributional impacts. It also notes that options should be selected/rejected based on the final combined weighted score of these CSFs. JAQU's approach, as set out in the options appraisal guidance, is that the reduction of human exposure is one factor to be considered amongst a number of other relevant factors, such as cost and practicability, when choosing between two options which achieve compliance in the same amount of time. Thus, JAQU's approach is that a local authority may *not* be bound to select the option that appears at the OBC stage (as further detailed modelling may still be required) to reduce human exposure more quickly, over and above all other factors. Rather, it may be legitimate to choose an option that does *not* reduce human exposure as quickly as other options if it performed better in relation to other factors.

1.14 The selection of GM's preferred option followed the JAQU approach and explained in the Strategic Case why Option 8 was preferred, i.e., it performed better on a number of other secondary CSFs, including affordability and distributional impacts, than the IRR CAZ D options - see paragraph 1.7.21 onwards.

1.15 JAQU confirmed that the options appraisal had correctly applied the JAQU options appraisal guidance at the OBC stage, including consideration of the reduction in human exposure; and that the direction required the local plan to be *implemented* in such a way as to achieve a quicker reduction in human exposure if that could be done.

1.16 JAQU's officer level feedback on the Outline Business Case (OBC) requested further evidence as part of the options appraisal to provide reassurance that the preferred option would deliver compliance in the shortest possible time and to provide further evidence in support of the bid for Funds.

1.17 Extensive data gathering, analysis and modelling was carried out following the submission of the OBC in order to respond to JAQU's questions and to develop more detailed proposals. This work was summarised in a series of 32 evidence

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notes[1] and further supplementary Technical Reports submitted to JAQU in draft between July 2019 and February 2020.

1.18 This included Technical Note 17[2] (December 2019) which responded to a request from JAQU to demonstrate that a GM-wide CAZ D could not bring forward compliance. This further evidence supported the decision not to progress with a GM-wide CAZ D and built upon the analysis within the GM CAP Outline Business Case (OBC) in relation to the issues surrounding the introduction of a CAZ D across the whole of GM, as an alternative to current proposals for the GM CAP. It stated that:

"Key conclusions from the OBC assessment of Option 6, a GM-wide CAZ D scenario, were as follows:

- *It is very unlikely that Option 6 could be delivered by 2021 and it appears unlikely that it could be delivered much before 2023. All aspects of the scheme, from the technical work required to design the scheme, to the scale of the infrastructure provision and customer service offer required to deliver it, would be slow, complex and subject to considerable risk. Moreover, the 'all or nothing' nature of this proposal presents a risk that no real improvements to air quality would be achieved for quite some time, and the time to compliance would be highly uncertain as a result;*
- *The scale of the intervention across the whole of GM is considered to be potentially undeliverable in physical terms and significantly risk delay to compliance as a result;*
- *It would not be possible in the required timescales to deliver transformative public transport improvements to facilitate sufficient mode shift. This would therefore significantly risk delay to compliance in order to have sufficient provision – which itself would incur substantial additional cost;*
- *A scheme on this scale would raise very significant issues in terms of the economic and social impact on the region, and widespread mitigation Measures would be required that are not likely to be feasible; and*
- *In summary, Option 6 would not deliver compliance in the shortest possible time, a fundamental Critical Success Factor (CSF), and would perform even more poorly in terms of reducing human exposure as there would be a long period without action on the ground; during which time considerable progress towards compliance would be expected with Option 8.*

[1] Note that 6 further technical notes were produced later in 2020, all notes are available at Technical Documents | Clean Air Greater Manchester (cleanairgm.com)
[2] Note 17 - Evidence supporting the decision not to progress with a GM-wide CAZ D (ctfassets.net)

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Further, it is noted that a scheme affecting private cars on this geographical scale is unprecedented:

- *GM covers 1,280km^2 whereas in comparison the CAZ D scheme proposed in Birmingham covers just 8km . There are 1.1 million cars registered to households across Greater Manchester, of which around 200-250k are expected to remain non-compliant by 2021.*

- *Case study analysis of Leeds and Birmingham CAP submissions, shows that similarly to GM, they discounted expansions to their respective CAZ areas due to implementation considerations, anticipated construction and user costs and consideration that there would be limited impact on air quality compliance targets.*

- *These less comprehensive CAZ definitions in terms of geographic coverage and in the case of Leeds, lesser degree of CAZ, were accepted by JAQU on the basis that they did not bring forward compliance, despite the submissions acknowledging some improved air quality under alternative options.*

The analysis within this Note reinforces the OBC conclusions and highlights additional aspects:

- *In order to develop, consult upon and deliver such a scheme as a GM-wide CAZ D, considerable planning activity would be required, encompassing research and data collection; modelling and analysis; policy development and scheme design; impacts assessments amongst other activities. Our experience is that this activity would typically take up to 2 years.*

- *There are several reasons to believe that a scheme on this scale could not be delivered within the timescale required, related to the feasibility of providing a sufficient camera network; boundary considerations and the need to minimise diverting traffic and tackle any safety concerns; and the provision of customer management services at a sufficient scale and quality within the time available.*

- *Therefore, a GM-wide CAZ D would pose an unacceptable delivery risk and as a result, would threaten the ability of the CAP to deliver compliance by the preferred option date of 2024 or to deliver earlier reductions in human exposure.*

- *Whilst GM applied best endeavours to adapt the behavioural responses available, these were not considered to be fully appropriate for a robust assessment at a GM-wide CAZ D scale scheme for the following reasons:*

— *The responses are considered inappropriate and overly optimistic for a regional scale scheme which involved charging of private cars. This is because, on a regional scale, the assumed level of public transport*

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provision implicit in the fixed percentage for 'change mode' is not consistent with the provision of public transport option available in GM. Introducing a CAZ D where there is not a public transport alternative available, means that people only have the choice of paying the charge or upgrading their vehicle. This would in reality likely deliver lower emissions benefits than forecast at the sifting stage for Option 6.

- *The behavioural responses available to those affected by a city centre scheme (and to a lesser extent, the inner London proposal) are different to the responses available to those affected by a region-wide scheme.*

- *Furthermore, it is considered a credible risk that a scheme of the scale proposed in Option 6, in combination with the schemes expected to go live elsewhere, would affect the cost of upgrading to a compliant vehicle, with the risk that a lower rate of upgrade than forecast and consequently lower than forecast emissions reductions would be achieved.*

Based on the available modelling – based on an implementation date of 2021 which is not in fact considered deliverable - the evidence suggests that a GM-wide CAZ D would not bring forward compliance compared to the preferred option:

- *The modelling was considered suitable for the purpose of identifying the likely best performing options for more detailed appraisal, but not as a credible forecast of when "compliance is not just possible but likely".*

- *The evidence available now suggests that even a GM wide CAZ D scheme would converge to the same final points of non-compliance in the city centre, meaning that (assuming delivery prior to 2024 was possible) compliance would be likely to be achieved at around the same time.*

Some of the most deprived areas in England are located in the areas of GM where people are most likely to own a non-compliant car, and also have limited access to public transport. Around 60,000 people live in deprived communities with high levels of non-compliant car ownership and poor public transport accessibility. A GM-wide CAZ D would have dramatic ramifications across the north-west region and country as a whole, the scale of which should not be underestimated."

1.19 Following the submission of technical notes 1 to 29 and review by JAQU's Technical Independent Review Panel (T-IRP) in November 2019, JAQU accepted GM's proposed methodology and requested resubmission of the Technical Reports underpinning the plan.

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1.20 A further technical note, submitted on February 14 2020 to JAQU in draft for consideration by JAQU and the Technical Independent Review Panel (T-IRP), Note 30[3], summarised a sensitivity test involving a GM-wide CAZ Class C charging zone introduced in 2021 (with LGVs, minibuses and coaches registered in GM exempt until 2023) with supporting measures and with and without an Inner Ring Road CAZ Class D. This showed that the addition of a CAZ Class D within the IRR (assuming it was also implemented in 2021) would not affect the date for compliance (2024) and that, although it would reduce the number of non-compliant sites in the interim, it would only reduce the total GM-wide NO_2 emissions compared with the Do-Minimum by 1% more than the Class C option.

1.21 The Technical Reports[4] and key supporting technical notes[5] were reviewed by JAQU and the T-IRP in February 2020.

1.22 Subsequently the Secretary of State issued a further direction on March 16 2020 with which the 10 GM local authorities must now comply. It provides that the authorities must take steps to implement the local plan for NO_2 compliance for the areas for which they are responsible. The local plan for NO_2 compliance is:

> "*the detailed scheme (excluding any associated mitigation measures) which the authorities identified as part of [the UK Plan for tackling roadside nitrogen dioxide concentrations 2017] to deliver compliance with the legal limit value for nitrogen dioxide in the shortest possible time that was considered by the Secretary of state on 16 March 2020, the approved measured of which are summarised in Schedule 1*".

1.23 The summary of the local plan measures in Schedule 1 was "*Charging Clean Air Zone Class C with additional measures*" with the deadline "*to be implemented as soon as possible and at least in time to bring forward compliance to 2024*".

1.24 The proposals as they stood in March 2020 included the following measures, as set out in the note 'Modelling Assumptions for the 'Option for Consultation'[6] submitted to JAQU in draft in January 2021:

- A category C CAZ covering the whole of Greater Manchester in 2021 with charge levels at £60 (HGV/bus/coach), £10 (LGV/minibus) and £7.50 (taxi);
- Temporary exemptions to 2023 for LGVs, minibuses, GM-licensed wheelchair accessible Hackney Carriages and Private Hire Vehicles, and GM-registered coaches;

[3] Note 30 - GM CAP Alternative Sensitivity Test Modelling Summary Note (ctfassets.net)
[4] Technical Reports T1 – T4, AQ1 – AQ3 and the Analytical Assurance Statement for the Consultation Option, as published at Technical Documents | Clean Air Greater Manchester (cleanairgm.com)
[5] Technical Notes 30, 31 and 32 were submitted in January/February 2020, available at Technical Documents | Clean Air Greater Manchester (cleanairgm.com)
[6] See Technical Documents | Clean Air Greater Manchester (cleanairgm.com)

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- Measures to invest in electric vehicle charging infrastructure for taxis and a try-before-you-buy electric taxi scheme;
- Funds to upgrade the bus fleet; and
- Funds for Taxi, PHV, LGV and HGV operators to upgrade their vehicles, plus Loan/Finance measures.

1.25 The Direction further provided that:

> *"The authorities must ensure that the local plan for No2 compliance is implemented so that –*
>
> > *"(a) compliance with the legal limit value for nitrogen dioxide is achieved in the shortest possible time, and by 2024 at the latest; and*
> >
> > (*b) exposure to levels above the legal limit for nitrogen dioxide are reduced as quickly as possible*."

Compliance with the Direction

1.26 The GM Clean Air Plan Policy (Appendix 1) proposes that a charging CAZ will be introduced on 30 May 2022[7]. This is now the earliest possible date for its implementation.

a. The ten GM local authorities have begun the preparatory implementation and contract arrangements required to deliver the CAZ and other GM CAP measures in order to maintain delivery momentum in line with the funding arrangements agreed with Government. TfGM is running the procurement exercises with potential suppliers on behalf of the ten GM local authorities to final evaluation and is to provide a report to allow the authorities to make a decision to award to the successful supplier(s) following receipt of the confirmation of funding from Government.

b. The geographic scale of the zone (almost 1,300km^2) is such that over 2,300 road signs and almost 1,000 automatic number plate recognition (ANPR) cameras will need to be installed on the highway network. The cameras need to be integrated into a technology platform, that will also be connected to the payment and vehicle checking services which have been established by central government. In addition, the operational teams of both TfGM and the chosen supplier must be recruited, trained and mobilised. Whilst much of this technology is tried and tested, the programme schedule is complex. This schedule currently shows that implementation of a scheme that has fully tested all of the component parts is late May 2022 and therefore this is the earliest date that the GM CAZ could launch.

[7] Subject to joint GM and JAQU agreement on overall 'readiness', including that the Central Charging Portal and national Vehicle Checker is' GM ready'.

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c. The funds which support the introduction of the charging zone will be implemented from November 2021. To effectively manage the distribution of the funds it is necessary to develop an IT platform, integrate that with a number of third parties for the purposes of validating applicant data and allowing for applicants to apply to a number of selected financiers should they wish to apply for a financial product to support their vehicle upgrade. As such November 2021 is the earliest that the funds can commence being distributed.

1.27 The local plan as set out in the GM Clean Air Plan Policy (Appendix 1), as so implemented, is forecast to achieve compliance with the legal limit value for nitrogen dioxide within Greater Manchester in 2024, which is the shortest possible time. This final plan provides for a CAZ Class C with additional measures as required by the direction. Its detail differs in a number of respects from some of the detailed individual proposals in the local plan considered by the Secretary of State in March 2020 as a result of consultation, a possibility that the Secretary of State would no doubt have contemplated when issuing the direction. These detailed changes are not considered to affect the outcomes which the Direction sought. For the avoidance of doubt, it is proposed to seek the Secretary of State's confirmation that the policy does not require the direction to be varied if it is to be implemented and to request a variation if he considers that it is required.

1.28 GM have followed Government guidance in terms of considering modelling uncertainties and has worked closely with JAQU's technical team and Technical Independent Review Panel (T-IRP) throughout the process to ensure the forecasting methodology is as robust as possible [8]. A discussion of uncertainty in the modelling of the Option for Consultation is set out in the Analytical Assurance Statement[9].

1.29 By and large, the analysis relies on well established data sources and on values provided by JAQU, TAG and the Green Book, including DEFRA's EFT v9.1a. GM's Plan does not rely on measures that are uncertain or aspirational. Compliance is achieved as a result of behaviour change (in terms of vehicle owners upgrading to cleaner vehicles) resulting from a Clean Air Zone, coupled with the provision of funding to support upgrade. The Plan relies only on measures that have a direct impact on the type of vehicles on the road (in terms of their emissions standard) and that are planned and funded and under the control of GM's authorities.

1.30 GM have considered the impacts of Covid-19 on the GM CAP, as set out in the 'Impacts of Covid-19 on the GM CAP Report'[10] and have specifically considered the impact on uncertainty, in line with Government guidance. At the time of writing, the UK is still operating under pandemic-related restrictions on activity and travel. It is

[8] T-IRP reviews have been sought as follows: (i) Initial Evidence Submission in May 2018; (ii) Outline Business Case in April 2019; (iii) Review of technical notes in November 2019; (iv) Review of updated Technical Reports (Consultation Option) and technical notes 30-32 in January 2020; (v) Review of further technical notes (34-37) in August 2020; (vi) GM's proposed approach to representing Covid-19 impacts in the core scenario in April 2021; and (vii) GM's Air Quality Modelling Report (post-Consultation) in June 2021.
[9] GM CAP Option for Consultation - Analytical Assurance Statement (ctfassets.net)
[10] This can be found in Appendix 5 of the June 2021 GMCA report

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therefore too early to say with certainty what the impacts of Covid-19 will be post-pandemic on behaviour, travel patterns, businesses and the economy. The Government's guidance on reflecting the impacts of Covid-19 within the modelling is set out in Appendix A of the Air Quality Modelling Report[11] and GM's proposed approach to representing the impact of Covid-19 in core modelling scenarios is set out in Appendix D of that same report. This includes a discussion of uncertainty, as section 7 of Appendix D; concluding that there is greater uncertainty as a result of the pandemic, with some aspects potentially worsening air quality and others potentially providing air quality improvements. Overall, Appendix D of the Air Quality Modelling Report concludes that it is very unlikely that any improvements to air quality would be of a sufficient scale to mean that action was no longer required.

1.31 In order to achieve compliance in the shortest possible time, GM needs to progress the modelling underpinning the GM CAP based on a set of reasonable assumptions about the medium-to-long term impacts of the pandemic. GM has made its best estimates of what is likely to happen based on the available evidence. These conclude that compliance is forecast to be achieved in Greater Manchester in 2024 with the local plan[12]. This is the same date as produced by the Consultation Option, and meets the requirements of the Ministerial Direction for such compliance to be achieved by 2024 at the latest. Compliance is achieved three years earlier than predicted without the GM CAP in place.

1.32 Nonetheless, uncertainty remains and as a result, sensitivity testing is planned and underway to consider the possible impacts of delayed development plans, increased homeworking, changes to GDP, impacts on public transport, and changes to vehicle purchasing costs and the affordability, feasibility or appeal of upgrade as a result of the pandemic. Sensitivity testing will also be conducted to assess the possible impact of other factors affecting certainty, unrelated to the pandemic.

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[11] This can be found in Appendix 6 of the June 2021 GMCA report

[12] Achieving compliance in Greater Manchester is not possible sooner with the other options that have been suggested. GM's forecasting has consistently shown that a GM-wide CAZ C achieves compliance in 2024 across GM. No other scheme has been identified that can achieve compliance more quickly, including the implementation of a CAZ D within the inner ring road (IRR). This has been the conclusion of modelling carried out at OBC (See AQ3 Local Plan Air Quality Modelling Report produced at OBC https://assets.ctfassets.net/tlpgbvy1k6h2/6cCMBAiLO7s6AjpWez5FHw/cb027ecf0d9ddc51332bda106f1ab8b7/AQ3_Local_Plan_Air_Quality_Modelling_Report.pdf) and prior to consultation (See AQ3 Local Plan Air Quality Modelling Report produced for the Option for Consultation GM CAP Option for Consultation - Local Plan Air Quality Modelling Tracking Table (AQ3) (ctfassets.net) and Note 30 - GM CAP Alternative Sensitivity Test Modelling Summary Note (ctfassets.net)), and the modelling of the post-consultation policy (as set out in the post-consultation Air Quality Modelling Report) confirms that compliance is forecast to be achieved in 2024. Although sensitivity testing has not been carried out considering a CAZ D in addition to the post-consultation policy, it can reasonably be concluded that a CAZ D in the IRR would not bring forward the date of compliance with the legal limits from 2024. This is because the results of the modelling for the Preferred Package show that there are five points of exceedance remaining in 2023 before compliance occurs in 2024. The spatial pattern of exceedance remains consistent, but the maximum concentrations are now at locations outside the IRR on the A58 Bolton Road, Bury. Modelling of the impacts of a CAZ D in the IRR have previously shown negligible impact on NO_2 concentrations at the A58 because it is not strategically linked with access to the regional centre. Therefore, implementing a CAZ D in the IRR would not be expected to bring forward compliance at the A58 or therefore across GM as a whole.

1.33 If the sensitivity testing identifies any potential issues with the plan as it stands, this will indicate that adaptive planning is required and GM will need to work with JAQU to agree mechanisms to facilitate this. Adaptations could include reviewing the charge levels; funding offers; or eligibility criteria for funding, with the aim of further encouraging upgrade if it appears that more people are choosing to stay and pay than forecast. GM could also review permanent discounts and exemptions if it becomes apparent that non-compliant vehicles will constitute a greater proportion of the on-the-road fleet than expected.

1.34 The local plan as set out in the GM Clean Air Plan Policy has a defined timetable for implementation and it will be implemented so that exposure to levels above the legal limit for nitrogen dioxide are reduced as quickly as possible. For example, Bus Retrofit commenced to ensure the most polluting vehicles should be retrofitted first and the policy proposes that the oldest vans are targeted first with funds, with other funds targeting the smallest commercial-vehicle owning businesses first, which are the least likely to be able to upgrade and typically operate the oldest vehicles.

1.35 Once the plan is in place, monitoring will also be required to ensure that the policy and proposals contained in the GM CAP remain appropriate throughout the lifetime of the interventions. GM will ensure that the CAP Monitoring and Evaluation Plan sets out to address issues where uncertainty remains as to post-pandemic conditions (or for other reasons), as identified in the sensitivity testing, and for example in terms of vehicle fleets, travel patterns and the provision of bus services. If the monitoring reveals issues with the performance of the measures that form the plan, again, an adaptive planning approach will be required, such that GM and JAQU can agree any changes to the plan that would make it more effective.

1.36 There are a number of other requirements in the Direction requiring steps to be taken by certain times that have not proved to be achievable given the effects of COVID-19 among other matters. The main outstanding requirements to be complied with is the submission of an interim full business case to be followed by a full business case.

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Greater Manchester's Clean Air Plan to Tackle Nitrogen Dioxide Exceedances at the Roadside

Appendix 10 – CAZ Signage and ANPR

Oldham

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Version Status:	DRAFT FOR APPROVAL	**Prepared by:**	Transport for Greater Manchester on behalf of the 10 Local Authorities of Greater Manchester
Date:	25 June 2021		

1 CAZ Signage and ANPR

1.1 This appendix sets out the proposed locations for all Greater Manchester (GM) Clean Air Zone (CAZ) signage and Automatic Number Plate Recognition (ANPR) Cameras[1] within Oldham Council's administrative area.

1.2 Section 177 of the Transport Act 2000 (the **TA 2000**) states that the Secretary of State may, '*direct the charging authority, or any of the charging authorities, in relation to a charging scheme … to place and maintain traffic signs, or cause traffic signs to be placed and maintained, in connection with the scheme*.'

1.3 As set out in the Clean Air Zone Framework, a minimum requirement for setting up a CAZ is to "have in place signs along major access routes to clearly delineate the route"[2]. Clear signing at the point of entry into a charging CAZ, as well as signs in advance of entry, are key to provide drivers with adequate information about potential charges applicable to their vehicle and to provide alternative routes for those who wish to divert around it.

1.4 In order for the 10 GM local authorities to operate the CAZ, specified signage is therefore required to be installed inside and outside the CAZ boundary, including within the local authority areas of the eight councils that border the GM local authorities.[3]

1.5 A clear and consistent sign is critical for those who may be entering a charging CAZ. To ensure consistency, the design of the symbol and traffic sign was commissioned centrally by the Joint Air Quality Unit (JAQU) who worked closely on the development of the signage strategy with the signs team in the Department for Transport (DfT).[4] The proposed signage consists of the following types of sign depending upon the location of the specific sign. Please note the examples below are representative and for the GM Clean Air Zone all signs will have the Letter C signifying a class C Clean Air Zone.

1.5.1 Advance Warning of a Clean Air Zone:



[1] Automatic Number Plate Recognition (ANPR) cameras are purpose built and mounted on either lamp posts or dedicated poles. They are designed to achieve a specific field of view and are fixed to 'look' at the highway and record the Registration Number of passing vehicles. The cameras are not able to be moved by remote operators.

[2] Available here: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/863730/clean-air-zone-framework-feb2020.pdf

[3] JAQU Guidance, 'Signs And Road Markings For Charging Clean Air Zones'.

[4] Department for Environment Food & Rural Affairs and Department for Transport, 'Clean Air Zone Symbol Guidelines.'

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1.5.2 Entrance to a Clean Air Zone:



1.5.3 Camera Head and Reminder of being in a Clean Air Zone



1.5.4 End of a Clean Air Zone:



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1.5.5 Advance Notification of the Introduction of a Clean Air Zone. This sign will be presented as a cover over the actual sign which will be removed in advance of the proposed go Live of the CAZ on 30th May 2022:



1.5.6 Clean Air Zone Roundel:



1.6 TfGM are undertaking on behalf of the 10 GM local authorities the preparatory procurement and contract arrangements required to deliver the CAZ and other measures. A procurement exercise has been undertaken for entry, exit and advance, repeater and advance direction signage, to cover the manufacture, installation, management and de-commissioning of such signs. TfGM have been working with Local Authority officers to propose the CAZ signage that is required to be sited in each Local Authority.

1.7 The following identifies the proposed locations of all CAZ signs and ANPR within Oldham Council.

CAZ Signage

Sign ID	Location drawing	Sign Structure Ref.	Easting	Northing	Nearest Road
OLD-001-ENT-001	60601741-ACM-OLD-DD-DR-TR-001001	ZBI+END-LATTIX-LOW-VE-100x	398282	414106	Ripponden Road
OLD-001-REP-001	60601741-ACM-OLD-DD-DR-TR-001301	REP-VE-75x	397805	411978	Ripponden Road

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Sign ID	Location drawing	Sign Structure Ref.	Easting	Northing	Nearest Road
OLD-001-REP-002	60601741-ACM-OLD-DD-DR-TR-001302	REP-VE-75x	397723	411805	Ripponden Road
OLD-002-ENT-001	60601741-ACM-OLD-DD-DR-TR-002001	ZBI+END-LATTIX-LOW-VE-100x	399827	412125	Huddersfield Road
OLD-003-ENT-001	60601741-ACM-OLD-DD-DR-TR-003001	ZBI+END-LATTIX-LOW-VE-100x	401866	409505	Standedge Cutting
OLD-004-ENT-001	60601741-ACM-OLD-DD-DR-TR-004001	ZBI+END-LATTIX-LOW-VE-100x	403764	406048	Holmfirth Road
OLD-004-REP-001	60601741-ACM-OLD-DD-DR-TR-004301	REP-OFFSET-RIGHT-50x	400615	403999	Holmfirth Road
OLD-004-REP-002	60601741-ACM-OLD-DD-DR-TR-004302	REP-50x	400709	403987	Holmfirth Road
OLD-005-REP-001	60601741-ACM-OLD-DD-DR-TR-005301	REP-VE-75x	401791	409469	Standedge Cutting
OLD-005-REP-002	60601741-ACM-OLD-DD-DR-TR-005302	REP-VE-75x	401697	409432	Standedge Cutting
OLD-111-REP-001	60601741-ACM-OLD-DD-DR-TR-111301	REP-50x	390752	407288	Middleton Road
OLD-115-REP-002	60601741-ACM-OLD-DD-DR-TR-115302	REP-50x	392119	406679	Oldham Road
OLD-118-REP-001	60601741-ACM-OLD-DD-DR-TR-118301	REP-50x	388471	403775	Greengate
OLD-120-REP-002	60601741-ACM-OLD-DD-DR-TR-120302	REP-50x	392125	403138	Hollins Road
OLD-124-REP-002	60601741-ACM-OLD-DD-DR-TR-124302	REP-50x	388539	400889	Peel Street
OLD-137-REP-002	60601741-ACM-OLD-DD-DR-TR-137302	REP-50x	392958	404842	Waterloo Street
OLD-147-REP-002	60601741-ACM-OLD-DD-DR-TR-147302	REP-50x	390075	403913	Whitegate Lane
OLD-501-ENT-001	60601741-ACM-OLD-DD-DR-TR-501001	ZBI-60x	389214	403566	Broadgate
OLD-501-ENT-002	60601741-ACM-OLD-DD-DR-TR-501002	ZBI-60x	389298	403563	Gateway Crescent
OLD-501-ENT-007	60601741-ACM-OLD-DD-DR-TR-501007	ZBI+END-60x	389496	403272	Local Road
OLD-501-ENT-008	60601741-ACM-OLD-DD-DR-TR-501008	ZBI+END-60x	389553	403242	Ryecroft Close
OLD-501-ENT-009	60601741-ACM-OLD-DD-DR-TR-501009	RHS-ZBI+END-75x	389800	402929	A6104
OLD-501-ENT-010	60601741-ACM-OLD-DD-DR-TR-501010	RHS-ZBI+END-75x	389822	402934	A6104
OLD-501-EXT-001	60601741-ACM-OLD-DD-DR-TR-501101	END-75x	389213	403586	Broadgate
OLD-501-EXT-002	60601741-ACM-OLD-DD-DR-TR-501102	END-75x	389329	403572	Gateway Crescent
OLD-501-EXT-009	60601741-ACM-OLD-DD-DR-TR-501109	END-75x	389541	403241	Ryecroft Close
OLD-502-ENT-001	60601741-ACM-OLD-DD-DR-TR-502001	RHS-ZBI-75x	390486	402574	Hollinwood Avenue
OLD-502-ENT-002	60601741-ACM-OLD-DD-DR-TR-502002	RHS-ZBI-75x	390496	402583	Hollinwood Avenue
OLD-502-ENT-003	60601741-ACM-OLD-DD-DR-TR-502003	ZBI-OFFSET-RIGHT-60x	390489	402472	Hollins Road
OLD-502-ENT-004	60601741-ACM-OLD-DD-DR-TR-502004	ZBI+END-60x	390479	402480	Hollins Road

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Sign ID	Location drawing	Sign Structure Ref.	Easting	Northing	Nearest Road
OLD-502-ENT-005	60601741-ACM-OLD-DD-DR-TR-502005	ZBI-60x	390604	402686	Manchester Road
OLD-502-ENT-006	60601741-ACM-OLD-DD-DR-TR-502006	ZBI-60x	390613	402683	Manchester Road
OLD-502-EXT-001	60601741-ACM-OLD-DD-DR-TR-502101	END-75x	390456	402485	Hollinwood Avenue
OLD-502-EXT-003	60601741-ACM-OLD-DD-DR-TR-502103	END-75x	390482	402619	Hollinwood Avenue
OLD-502-EXT-004	60601741-ACM-OLD-DD-DR-TR-502104	END-75x	390458	402621	Hollinwood Avenue
OLD-502-EXT-005	60601741-ACM-OLD-DD-DR-TR-502105	END-75x	390656	402756	Manchester Road
OLD-502-EXT-006	60601741-ACM-OLD-DD-DR-TR-502106	END-75x	390648	402758	Manchester Road
OLD-502-REP-004	60601741-ACM-OLD-DD-DR-TR-502304	REP-50x	390433	402422	Manchester Road
OLD-502-REP-011	60601741-ACM-OLD-DD-DR-TR-502311	REP-50x	390427	402646	Hollinwood Avenue
OLD-502-REP-012	60601741-ACM-OLD-DD-DR-TR-502312	REP-75x	390415	402668	Hollinwood Avenue
OLD-502-REP-013	60601741-ACM-OLD-DD-DR-TR-502313	REP-50x	390672	402829	Manchester Road
OLD-503-ENT-004	60601741-ACM-OLD-DD-DR-TR-503004	RHS-ZBI-75x	390940	406630	Chadderton Way
OLD-503-ENT-005	60601741-ACM-OLD-DD-DR-TR-503005	RHS-ZBI-75x	390925	406630	Chadderton Way
OLD-503-ENT-006	60601741-ACM-OLD-DD-DR-TR-503006	RHS-ZBI-75x	390928	406712	Broadway
OLD-503-ENT-007	60601741-ACM-OLD-DD-DR-TR-503007	RHS-ZBI-75x	390932	406721	Broadway
OLD-503-ENT-008	60601741-ACM-OLD-DD-DR-TR-503008	ZBI-60x	390725	406592	Burnley Lane
OLD-503-EXT-004	60601741-ACM-OLD-DD-DR-TR-503103	END-LOW-75x	390945	406586	Chadderton Way
OLD-503-EXT-005	60601741-ACM-OLD-DD-DR-TR-503104	END-LOW-75x	390958	406594	Chadderton Way
OLD-503-EXT-006	60601741-ACM-OLD-DD-DR-TR-503105	END-75x	390951	406680	Broadway
OLD-503-EXT-007	60601741-ACM-OLD-DD-DR-TR-503106	END-75x	390946	406694	Broadway
OLD-503-EXT-008	60601741-ACM-OLD-DD-DR-TR-503107	END-LOW-75x	390730	406638	Burnley Lane
OLD-503-EXT-009	60601741-ACM-OLD-DD-DR-TR-503108	END-LOW-75x	390722	406641	Burnley Lane
OLD-504-ENT-002	60601741-ACM-OLD-DD-DR-TR-504002	RHS-ZBI-75x	390813	406468	Burnley Lane
OLD-505-ENT-001	60601741-ACM-OLD-DD-DR-TR-505001	ZBI+END-OFFSET-RIGHT-60x	390689	406268	Parkdale
OLD-506-ENT-001	60601741-ACM-OLD-DD-DR-TR-506001	RHS-ZBI+END-75x	390625	406102	Park View
OLD-506-EXT-002	60601741-ACM-OLD-DD-DR-TR-506102	END-75x	390658	406084	Broadway
OLD-507-ENT-001	60601741-ACM-OLD-DD-DR-TR-507001	ZBI-60x	390491	405490	Middleton Road
OLD-507-ENT-002	60601741-ACM-OLD-DD-DR-TR-507002	ZBI-60x	390385	405518	Middleton Road

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Sign ID	Location drawing	Sign Structure Ref.	Easting	Northing	Nearest Road
OLD-507-EXT-001	60601741-ACM-OLD-DD-DR-TR-507101	END-75x	390502	405473	Middleton Road
OLD-507-EXT-002	60601741-ACM-OLD-DD-DR-TR-507102	END-OFFSET-RIGHT-75x	390391	405531	Middleton Road
OLD-508-ENT-001	60601741-ACM-OLD-DD-DR-TR-508001	ZBI-OFFSET-RIGHT-60x	390368	405274	Hunt Lane
OLD-508-ENT-002	60601741-ACM-OLD-DD-DR-TR-508002	ZBI-OFFSET-60x	390256	405328	Hunt Lane
OLD-508-EXT-001	60601741-ACM-OLD-DD-DR-TR-508101	END-75x	390357	405268	Hunt Lane
OLD-508-EXT-002	60601741-ACM-OLD-DD-DR-TR-508102	END-75x	390261	405339	Hunt Lane
OLD-509-ENT-001	60601741-ACM-OLD-DD-DR-TR-509001	ZBI+END-60x	390190	405054	Derwent Drive
OLD-510-ENT-001	60601741-ACM-OLD-DD-DR-TR-510001	ZBI-OFFSET-50x	390185	404839	Fold Green
OLD-510-ENT-002	60601741-ACM-OLD-DD-DR-TR-510002	ZBI+END-OFFSET-60x	390116	404833	Milton Drive
OLD-510-EXT-001	60601741-ACM-OLD-DD-DR-TR-510101	END-OFFSET-75x	390188	404826	Fold Green
OLD-511-ENT-001	60601741-ACM-OLD-DD-DR-TR-511001	ZBI+END-50x	390069	404607	Local Access Road
OLD-512-ENT-001	60601741-ACM-OLD-DD-DR-TR-512001	ZBI+END-60x	390026	404445	Thatch Leach
OLD-513-ENT-001	60601741-ACM-OLD-DD-DR-TR-513001	ZBI+END-60x	390006	404165	Eaves Lane
OLD-513-ENT-002	60601741-ACM-OLD-DD-DR-TR-513002	ZBI-60x	389926	404235	Foxdenton Lane
OLD-513-EXT-002	60601741-ACM-OLD-DD-DR-TR-513102	END-OFFSET-75x	389948	404229	Foxdenton Lane
OLD-514-ENT-001	60601741-ACM-OLD-DD-DR-TR-514001	ZBI-OFFSET-60x	390001	403923	Whitegate Lane
OLD-514-ENT-002	60601741-ACM-OLD-DD-DR-TR-514002	ZBI+END-60x	389966	403905	Whitegate Lane
OLD-514-ENT-003	60601741-ACM-OLD-DD-DR-TR-514003	ZBI+END-OFFSET-60x	389887	403920	Jardine Way
OLD-514-EXT-001	60601741-ACM-OLD-DD-DR-TR-514101	END-OFFSET-75x	389968	403892	Whitegate Lane
OLD-515-ENT-001	60601741-ACM-OLD-DD-DR-TR-515001	ZBI-OFFSET-50x	389902	403768	Whitegate Avenue
OLD-515-EXT-001	60601741-ACM-OLD-DD-DR-TR-515101	END-75x	389880	403782	Whitegate Avenue
OLD-516-ENT-001	60601741-ACM-OLD-DD-DR-TR-516001	ZBI-60x	389741	403724	Gorse Street
OLD-516-ENT-002	60601741-ACM-OLD-DD-DR-TR-516002	ZBI-OFFSET-RIGHT-60x	389713	403684	Gorse Street
OLD-516-EXT-001	60601741-ACM-OLD-DD-DR-TR-516101	END-75x	389751	403739	Gorse Street
OLD-517-ENT-001	60601741-ACM-OLD-DD-DR-TR-517001	ZBI-OFFSET-60x	389604	403482	Long Lane
OLD-517-ENT-002	60601741-ACM-OLD-DD-DR-TR-517002	ZBI-60x	389543	403528	Local Road
OLD-517-EXT-001	60601741-ACM-OLD-DD-DR-TR-517101	END-OFFSET-75x	389608	403450	Long Lane
OLD-517-EXT-002	60601741-ACM-OLD-DD-DR-TR-517102	END-OFFSET-75x	389564	403536	Local Road

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Sign ID	Location drawing	Sign Structure Ref.	Easting	Northing	Nearest Road
OLD-518-ENT-001	60601741-ACM-OLD-DD-DR-TR-518001	ZBI-50x	389388	403336	Stott Road
OLD-518-EXT-001	60601741-ACM-OLD-DD-DR-TR-518101	END-75x	389397	403341	Stott Road
OLD-519-ENT-001	60601741-ACM-OLD-DD-DR-TR-519001	ZBI-60x	389321	403144	Butterworth Lane
OLD-519-ENT-002	60601741-ACM-OLD-DD-DR-TR-519002	ZBI-60x	389269	403199	Restricted Local Access Road
OLD-519-EXT-001	60601741-ACM-OLD-DD-DR-TR-519101	END-75x	389316	403125	Butterworth Lane
OLD-519-EXT-002	60601741-ACM-OLD-DD-DR-TR-519102	END-75x	389254	403222	Mough Lane
OLD-520-ENT-001	60601741-ACM-OLD-DD-DR-TR-520001	ZBI-50x	389166	402991	St George's Square
OLD-520-EXT-001	60601741-ACM-OLD-DD-DR-TR-520101	END-75x	389171	403002	St George's Square
OLD-521-ENT-001	60601741-ACM-OLD-DD-DR-TR-521001	RHS-ZBI-OFFSET-RIGHT-75x	389187	402854	Hollinwood Avenue
OLD-521-ENT-003	60601741-ACM-OLD-DD-DR-TR-521003	RHS-ZBI-OFFSET-75x	389107	402870	Hollinwood Avenue
OLD-521-EXT-001	60601741-ACM-OLD-DD-DR-TR-521101	END-75x	389185	402836	Hollinwood Avenue
OLD-521-EXT-003	60601741-ACM-OLD-DD-DR-TR-521103	END-75x	389096	402897	Hollinwood Avenue
OLD-522-ENT-001	60601741-ACM-OLD-DD-DR-TR-522001	ZBI+END-60x	389951	404071	Secondary Access Road
MAN-509-REP-004	No drawing required	REP-LC-50x	388962	402939	Hollinwood Avenue
MAN-509-REP-006	No drawing required	REP-LC-50x	388931	403020	Owler Lane
OLD-002-REP-001	No drawing required	REP-LC-50x	397699	410445	Huddersfield Road
OLD-002-REP-002	No drawing required	REP-LC-50x	397771	410426	Huddersfield Road
OLD-101-REP-001	No drawing required	REP-LC-50x	394276	410411	Milnrow Road
OLD-101-REP-002	No drawing required	REP-LC-50x	394292	410550	Milnrow Road
OLD-102-REP-001	No drawing required	REP-LC-50x	393844	409157	Crompton Way
OLD-102-REP-002	No drawing required	REP-LC-50x	393937	409241	Crompton Way
OLD-103-REP-001	No drawing required	REP-LC-50x	395378	407819	Ripponden Road
OLD-103-REP-002	No drawing required	REP-LC-50x	395422	407870	Ripponden Road
OLD-104-REP-001	No drawing required	REP-LC-50x	397970	406656	Oldham Road
OLD-104-REP-002	No drawing required	REP-LC-50x	397983	406567	Oldham Road
OLD-105-REP-001	No drawing required	REP-LC-50x	399827	407007	Standedge Road
OLD-105-REP-002	No drawing required	REP-LC-50x	399841	407076	Standedge Road
OLD-107-REP-001	No drawing required	REP-LC-50x	398341	403637	Manchester Road
OLD-107-REP-002	No drawing required	REP-LC-50x	398397	403650	Manchester Road
OLD-108-REP-001	No drawing required	REP-LC-50x	395057	404539	High Street
OLD-108-REP-002	No drawing required	REP-LC-50x	395109	404577	High Street
OLD-109-REP-001	No drawing required	REP-LC-50x	393161	406617	Higginshaw Lane
OLD-109-REP-002	No drawing required	REP-LC-50x	393166	406729	Higginshaw Lane
OLD-110-REP-001	No drawing required	REP-LC-50x	393230	408234	Shaw Road
OLD-110-REP-002	No drawing required	REP-LC-50x	393305	408307	Shaw Road

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Sign ID	Location drawing	Sign Structure Ref.	Easting	Northing	Nearest Road
OLD-111-REP-002	No drawing required	REP-LC-50x	390808	407326	Middleton Road
OLD-112-REP-001	No drawing required	REP-LC-50x	393154	405504	Egerton Street
OLD-112-REP-002	No drawing required	REP-LC-50x	393199	405539	Egerton Street
OLD-113-REP-001	No drawing required	REP-LC-50x	391352	405171	Middleton Road
OLD-113-REP-002	No drawing required	REP-LC-50x	391445	405164	Middleton Road
OLD-114-REP-001	No drawing required	REP-LC-50x	393695	405336	Cheetham Street
OLD-114-REP-002	No drawing required	REP-LC-50x	393960	405477	Huddersfield Road
OLD-114-REP-003	No drawing required	REP-LC-50x	393804	405480	Barry Street
OLD-114-REP-004	No drawing required	REP-LC-50x	393714	405424	St James's Street
OLD-115-REP-001	No drawing required	REP-LC-50x	392108	406601	Oldham Road
OLD-117-REP-001	No drawing required	REP-LC-50x	390777	403964	Block Lane
OLD-117-REP-002	No drawing required	REP-LC-50x	390863	404042	Block Lane
OLD-118-REP-002	No drawing required	REP-LC-50x	388510	403848	Greengate
OLD-119-REP-001	No drawing required	REP-LC-50x	390460	403134	Drury Lane
OLD-119-REP-002	No drawing required	REP-LC-50x	390643	403113	Drury Lane
OLD-120-REP-001	No drawing required	REP-LC-50x	392061	403038	Hollins Road
OLD-121-REP-001	No drawing required	REP-LC-50x	392059	403906	Chamber Road
OLD-121-REP-002	No drawing required	REP-LC-50x	392145	403961	Chamber Road
OLD-121-REP-003	No drawing required	REP-LC-50x	392119	403830	Burlington Avenue
OLD-123-REP-001	No drawing required	REP-LC-50x	394756	403352	Abbey Hills Road
OLD-123-REP-002	No drawing required	REP-LC-50x	394983	403168	Abbey Hills Road
OLD-123-REP-003	No drawing required	REP-LC-50x	395012	403172	Lees New Road
OLD-124-REP-001	No drawing required	REP-LC-50x	388398	400838	Oldham Road
OLD-124-REP-003	No drawing required	REP-LC-50x	388430	400867	Morton Street
OLD-124-REP-004	No drawing required	REP-LC-50x	388498	400858	Corn Street
OLD-125-REP-001	No drawing required	REP-LC-50x	389786	401147	Lord Lane
OLD-125-REP-002	No drawing required	REP-LC-50x	389764	401202	Lord Lane
OLD-126-REP-001	No drawing required	REP-LC-50x	390966	402624	School Road
OLD-126-REP-002	No drawing required	REP-LC-50x	391039	402646	Hollins Road
OLD-126-REP-003	No drawing required	REP-LC-50x	391023	402610	Secondary Access Road
OLD-127-REP-001	No drawing required	REP-LC-50x	389603	405755	Middleton Road
OLD-127-REP-003	No drawing required	REP-LC-50x	389737	405721	Middleton Road
OLD-128-REP-001	No drawing required	REP-LC-50x	396326	405515	Huddersfield Road
OLD-128-REP-002	No drawing required	REP-LC-50x	396442	405591	Huddersfield Road
OLD-129-REP-001	No drawing required	REP-LC-50x	396489	405508	Lower Turf Lane
OLD-129-REP-002	No drawing required	REP-LC-50x	396552	405635	Lower Turf Lane
OLD-130-REP-001	No drawing required	REP-LC-50x	391655	403935	Frederick Street
OLD-130-REP-002	No drawing required	REP-LC-50x	391605	404004	Frederick Street
OLD-131-REP-001	No drawing required	REP-LC-50x	392834	402653	Ashton Road
OLD-131-REP-002	No drawing required	REP-LC-50x	392851	402534	Ashton Road
OLD-131-REP-003	No drawing required	REP-LC-50x	392884	402579	Ducie Street

UNDER APPROVAL

Sign ID	Location drawing	Sign Structure Ref.	Easting	Northing	Nearest Road
OLD-132-REP-001	No drawing required	REP-LC-50x	392595	404506	Park Road
OLD-132-REP-002	No drawing required	REP-LC-50x	392640	404473	Park Road
OLD-133-REP-001	No drawing required	REP-LC-50x	392463	404074	Ashton Road
OLD-134-REP-001	No drawing required	REP-LC-50x	392469	404112	Ashton Road
OLD-136-REP-001	No drawing required	REP-LC-50x	393912	405029	Lees Road
OLD-136-REP-002	No drawing required	REP-LC-50x	394013	404976	Lees Road
OLD-136-REP-003	No drawing required	REP-LC-50x	394002	404974	Staley Street
OLD-136-REP-004	No drawing required	REP-LC-50x	394022	405024	Cow Lane
OLD-137-REP-001	No drawing required	REP-LC-50x	392953	404887	Waterloo Street
OLD-137-REP-003	No drawing required	REP-LC-50x	392959	404881	Roscoe Street
OLD-138-REP-001	No drawing required	REP-LC-50x	392184	405269	Rochdale Road
OLD-138-REP-002	No drawing required	REP-LC-50x	392172	405399	Rochdale Road
OLD-138-REP-003	No drawing required	REP-LC-50x	392161	405301	Alderson Street
OLD-139-REP-001	No drawing required	REP-LC-50x	392042	405044	Middleton Road
OLD-139-REP-002	No drawing required	REP-LC-50x	392099	405036	Middleton Road
OLD-140-REP-001	No drawing required	REP-LC-50x	391609	406854	Broadway
OLD-140-REP-002	No drawing required	REP-LC-50x	391673	406883	Broadway
OLD-141-REP-001	No drawing required	REP-LC-50x	391891	407915	Rochdale Road
OLD-141-REP-002	No drawing required	REP-LC-50x	391792	408140	Schofield Street
OLD-141-REP-003	No drawing required	REP-LC-50x	391887	408057	Bleasdale Street
OLD-142-REP-001	No drawing required	REP-LC-50x	390901	402118	Roman Road
OLD-142-REP-002	No drawing required	REP-LC-50x	390793	402064	Roman Road
OLD-147-REP-001	No drawing required	REP-LC-50x	390036	403928	Whitegate Lane
OLD-148-REP-001	No drawing required	REP-LC-50x	389919	404242	Foxdenton Lane
OLD-148-REP-002	No drawing required	REP-LC-50x	389849	404334	Foxdenton Lane
OLD-149-REP-001	No drawing required	REP-LC-50x	390094	404087	Eaves Lane
OLD-149-REP-002	No drawing required	REP-LC-50x	390151	403988	Eaves Lane
OLD-150-REP-001	No drawing required	REP-LC-50x	390145	405379	Hunt Lane
OLD-150-REP-002	No drawing required	REP-LC-50x	390241	405336	Hunt Lane
OLD-151-REP-001	No drawing required	REP-LC-50x	390360	405281	Hunt Lane
OLD-151-REP-002	No drawing required	REP-LC-50x	390427	405236	Hunt Lane
OLD-501-REP-001	No drawing required	REP-LC-50x	389178	403612	Broadgate
OLD-501-REP-002	No drawing required	REP-LC-50x	389367	403611	Gateway Crescent
OLD-501-REP-006	No drawing required	REP-LC-50x	389898	403693	Whitegate Avenue
OLD-501-REP-009	No drawing required	REP-LC-50x	389702	403335	Long Lane
OLD-501-REP-017	No drawing required	REP-LC-50x	389397	402972	Butterworth Lane
OLD-501-REP-020	No drawing required	REP-LC-50x	389211	403189	St George's Square
OLD-501-REP-021	No drawing required	REP-LC-50x	389166	403271	Mough Lane
OLD-502-REP-003	No drawing required	REP-LC-50x	390448	402422	Manchester Road
OLD-502-REP-007	No drawing required	REP-LC-50x	390623	402319	Albert Street
OLD-502-REP-008	No drawing required	REP-LC-50x	390602	402369	Albert Street

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Sign ID	Location drawing	Sign Structure Ref.	Easting	Northing	Nearest Road
OLD-502-REP-009	No drawing required	REP-LC-50x	390348	402344	Wickentree Lane
OLD-502-REP-010	No drawing required	REP-LC-50x	390344	402321	Oldham Road
OLD-502-REP-014	No drawing required	REP-LC-50x	390682	402824	Manchester Road
OLD-503-REP-001	No drawing required	REP-LC-50x	391078	406472	Chadderton Way
OLD-503-REP-003	No drawing required	REP-LC-50x	391110	406675	Broadway
OLD-503-REP-004	No drawing required	REP-LC-50x	390638	406544	Burnley Lane
OLD-507-REP-002	No drawing required	REP-LC-50x	390541	405472	Middleton Road
OLD-507-REP-003	No drawing required	REP-LC-50x	390535	405447	Dalton Street
OLD-507-REP-004	No drawing required	REP-LC-50x	390213	405594	Middleton Road
OLD-507-REP-005	No drawing required	REP-LC-50x	390624	405427	Middleton Road
OLD-507-REP-006	No drawing required	REP-LC-50x	390638	405444	Burnley Street
OLD-513-REP-001	No drawing required	REP-LC-50x	390028	404175	Denton Lane
OLD-513-REP-002	No drawing required	REP-LC-50x	390100	404209	Denton Lane
OLD-521-REP-001	No drawing required	REP-LC-50x	389419	402783	Hollinwood Avenue

Automatic Number Plate Recognition (ANPR) Cameras

1.8 In order to enforce the boundary, Automatic Number Plate Recognition (ANPR) Cameras are required. TfGM have been working with Local Authority officers to propose the ANPR cameras that need to be sited in each GM authority administrative area. It is proposed to locate ANPR cameras at the following locations:

Site reference	Road name	Latitude	Longitude	Lighting column reference	Proposed infrastructure
OLD-001-CAM-001	A672 Ripponden Road	53.60355	-2.0353542	12	Replacement structure
OLD-002-CAM-001	A640 Huddersfield Road	53.590508	-2.0357511	11	Replacement structure
OLD-004-CAM-001	A635 Holmfirth Road	53.532619	-1.991845	10	Replacement structure
OLD-005-CAM-001	A62 Standedge Cutting	53.581621	-1.9753723	N/A	New structure
OLD-101-CAM-001	A663 Milnrow Road	53.591173	-2.0876915	54	Replacement structure
OLD-102-CAM-001	A663 Crompton Way	53.579331	-2.0936478	36	Replacement structure
OLD-103-CAM-001	A672 Ripponden Road	53.567167	-2.0708063	97	Replacement structure
OLD-104-CAM-001	A62 Oldham Road	53.556263	-2.0320389	36	Replacement structure
OLD-105-CAM-001	Standedge Road	53.560151	-2.003917	6	Replacement structure
OLD-107-CAM-001	A635 Manchester Road	53.529453	-2.0260446	60	Replacement structure
OLD-108-CAM-001	A669 High Street	53.537692	-2.0757663	4	Replacement structure
OLD-109-CAM-001	Higginshaw Lane	53.55677	-2.1046778	6	Replacement structure
OLD-110-CAM-001	Shaw Road	53.57091	-2.1032934	49	Replacement structure
OLD-111-CAM-001	B6195 Middleton Road	53.562324	-2.1407438	43	Replacement structure
OLD-112-CAM-001	Egerton Street	53.546281	-2.1044557	18	Replacement structure
OLD-113-CAM-001	A669 Middleton Road	53.543054	-2.1314595	26	Replacement structure

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Site reference	Road name	Latitude	Longitude	Lighting column reference	Proposed infrastructure
OLD-114-CAM-001	Huddersfield Road	53.545021	-2.0956393	11	Replacement structure
OLD-114-CAM-002	Huddersfield Road	53.545238	-2.0943269	18	Replacement structure
OLD-115-CAM-001	Oldham Road	53.556521	-2.1206026	48	Replacement structure
OLD-116-CAM-001	A627 Oldham Way	53.544751	-2.124538	No ID	Replacement structure
OLD-117-CAM-001	B6190 Block Lane	53.532456	-2.1402976	28	Replacement structure
OLD-118-CAM-001	Greengate	53.530855	-2.1749149	68	Replacement structure
OLD-118-CAM-002	Greengate	53.530694	-2.175314	69	Replacement structure
OLD-119-CAM-001	B6189 Drury Lane	53.524497	-2.1435294	12	Replacement structure
OLD-120-CAM-001	Hollins Road	53.524531	-2.1207529	31	Replacement structure
OLD-121-CAM-001	Chamber Road	53.531839	-2.1208039	13	Replacement structure
OLD-122-CAM-001	A62 Manchester Road	53.533814	-2.1320343	13	Replacement structure
OLD-123-CAM-001	B6194 Abbey Hills Road	53.52543	-2.0774338	59	Replacement structure
OLD-124-CAM-001	A62 Oldham Road	53.504636	-2.1745806	5	Replacement structure
OLD-125-CAM-001	Lord Lane	53.507143	-2.1556534	7	Replacement structure
OLD-126-CAM-001	A6104 Hollins Road	53.520334	-2.1369846	85	Replacement structure
OLD-127-CAM-001	A669 Middleton Road	53.548155	-2.1571624	24	Replacement structure
OLD-128-CAM-001	A62- Huddersfield Road	53.546511	-2.0560271	134	Replacement structure
OLD-129-CAM-001	Lower Turf Lane	53.546566	-2.0541106	4	Replacement structure
OLD-130-CAM-001	Frederick Street	53.532299	-2.127745	36	Replacement structure
OLD-131-CAM-001	A627 Ashton Road	53.519967	-2.109383	87	Replacement structure
OLD-132-CAM-001	Park Road	53.536961	-2.1128972	6	Replacement structure
OLD-133-CAM-001	A627 Ashton Road	53.533615	-2.1153625	22	Replacement structure
OLD-134-CAM-001	A627 Ashton Road	53.532556	-2.114583	29	Replacement structure
OLD-136-CAM-001	A669 Lees Road	53.541554	-2.0923268	31	Replacement structure
OLD-137-CAM-001	Waterloo Street	53.540265	-2.1077907	8	Existing LC
OLD-138-CAM-001	A671 Rochdale Road	53.544801	-2.119694	19	Replacement structure
OLD-139-CAM-001	A669 Middleton Road	53.541968	-2.1211648	6	Replacement structure
OLD-140-CAM-001	A663 Broadway	53.558321	-2.1275669	33	Replacement structure
OLD-141-CAM-001	A671 Rochdale Road	53.568077	-2.1241537	16	Replacement structure
OLD-142-CAM-001	Roman Road	53.515478	-2.1392159	31	Replacement structure
OLD-147-CAM-001	Whitegate Lane	53.531786	-2.1513537	3	Replacement structure
OLD-148-CAM-001	B6189 Foxdenton Lane	53.53536	-2.1541426	36	Replacement structure
OLD-149-CAM-001	Eaves Lane	53.53309	-2.1507398	6	Replacement structure
OLD-150-CAM-001	Hunt Lane	53.544848	-2.1497253	16	Replacement structure
OLD-151-CAM-001	Hunt Lane	53.543837	-2.1463112	25	Replacement structure
OLD-501-CAM-001	Broadgate	53.528803	-2.164226	13	Replacement structure
OLD-501-CAM-002	Gateway Crescent	53.528931	-2.1622955	2	Replacement structure
OLD-501-CAM-003	Butterworth Lane	53.523943	-2.1619597	7	Replacement structure
OLD-501-CAM-013	Long Lane	53.527059	-2.1575819	7	Replacement structure
OLD-501-CAM-019	Hollinwood Avenue	53.52223	-2.1527374	N/A	New structure

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Site reference	Road name	Latitude	Longitude	Lighting column reference	Proposed infrastructure
OLD-501-CAM-021	Whitegate Avenue	53.530237	-2.1535507	3	Replacement structure
OLD-501-CAM-022	Mough Lane	53.525747	-2.1645309	4	Replacement structure
OLD-502-CAM-001	Hollinwood Avenue	53.520028	-2.1454297	2	Replacement structure
OLD-502-CAM-002	A62 Manchester Road	53.518194	-2.1458155	89	Replacement structure
OLD-502-CAM-003	Manchester Road	53.521721	-2.142615	94	Replacement structure
OLD-502-CAM-004	Albert Street	53.517658	-2.1430387	3	Replacement structure
OLD-502-CAM-005	Manchester Road	53.517887	-2.1465685	86	Replacement structure
OLD-502-CAM-007	Manchester Road	53.521578	-2.1422978	93	Replacement structure
OLD-503-CAM-001	Chadderton Way	53.555587	-2.1371289	76	Replacement structure
OLD-503-CAM-002	A663 Broadway	53.5568	-2.1373592	70	Replacement structure
OLD-503-CAM-003	Burnley Lane	53.555698	-2.1416426	3	Replacement structure
OLD-507-CAM-001	A669 Middleton Road	53.545611	-2.143361	57	Replacement structure
OLD-507-CAM-002	A669 Middleton Road	53.546487	-2.1478295	4	Replacement structure
OLD-513-CAM-001	Denton Lane	53.534393	-2.1512574	41	Replacement structure
OLD-521-CAM-001	A6104 Hollinwood Avenue	53.521677	-2.1630973	65	Replacement structure
OLD-521-CAM-002	A6104 Hollinwood Avenue	53.521942	-2.163472	68	Replacement structure

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