

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

## Response to Consultation



Salford City Council



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Council



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## 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<sup>1</sup>. 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.<sup>2</sup>
- 1.3 This report addresses the feedback raised in respect of each element of the proposals presented at consultation and 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<sup>3</sup>.
- 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

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<sup>1</sup> This can be found in Appendix 2 of the June 2021 GMCA report.

<sup>2</sup> [https://images.ctfassets.net/tlpqbvvy1k6h2/38mpTrGAw7qtuneFVIn93c/c919fd3e08d54ec1f17e114a3b014093/20-0565\\_CAP\\_Consultation\\_Summary\\_WEB.pdf](https://images.ctfassets.net/tlpqbvvy1k6h2/38mpTrGAw7qtuneFVIn93c/c919fd3e08d54ec1f17e114a3b014093/20-0565_CAP_Consultation_Summary_WEB.pdf)

<sup>3</sup> 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.

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.

## 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
<b>Launch date</b>	Spring 2022	30 May 2022 <sup>4</sup>
<b>Boundary</b>	Boundary coincided with the GM administrative boundary	No change but propose to include the A575 and A580 at Worsley subject to consultation.
<b>Timings</b>	24 hours a day, 7 days a week, all year	No proposed changes.
<b>Charging day</b>	Midnight to midnight	No proposed changes.
<b>Vehicles affected and daily charges</b>	Bus Heavy Goods Vehicle (HGV) £60 Coach £10 Light Goods Vehicle (LGV) £10 Minibus £7.50 Hackney Carriage £7.50 Private Hire	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.

<sup>4</sup> Subject to joint GM and JAQU agreement on overall 'readiness', including that the Central Charging Portal and national Vehicle Checker is 'GM ready'

Key characteristics	Policy at consultation	Proposed Final Plan Policy
	Vehicle (PHV)	
<b>Temporary exemptions</b>	<p>LGVs and minibuses GM-registered coaches GM-licensed Wheelchair accessible Hackney carriages and PHVs Outstanding finance / limited supply</p> <p>All temporary exemptions ended 31 December 2022</p>	<p>All LGVs, coaches and minibuses. All GM-licensed Hackney carriages and PHVs. Outstanding finance/ limited supply</p> <p>Above temporary exemptions to end 31 May 2023 (A year after CAZ launch)</p> <p>Buses used on a GM school bus service tendered prior to March 2019 exempt to end July 2022<sup>5</sup></p>
<b>Permanent discounts</b>	<p>GM licensed PHVs – 5/7 discount</p> <p>Leisure vehicles (&gt;3.5t) in private ownership registered to an address in GM eligible to apply for a discounted charge of £10 per day</p>	<p>PHV discount replaced with temporary exemption as more appropriate means of support</p> <p>All vehicles classified under the Private HGV tax class to be eligible for a discounted charge of £10 per day.</p>
<b>Permanent national exemptions</b>	<p>Historic vehicles Military vehicles Specialist emergency services vehicles Disabled tax class vehicles</p>	No proposed changes.
<b>Permanent local exemptions</b>	<p>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</p>	<p>All previous local exemptions remain.</p> <p>Additional exemptions: LGVs and Minibuses specially adapted for use by a disabled user Heritage buses not used for hire and reward Driver training buses</p>

<sup>5</sup> 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.

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
<b>Bus</b>	£60	30 May 2022 <sup>6</sup> (Same as at consultation)	£16k (Same as at consultation)	£16k (Same as at consultation)
<b>HGV</b>	£60	30 May <sup>7</sup> 2022 (Same as at consultation)	Up to £12k (Previously up to £5.5k)	£16k (Same as at consultation)
<b>Coach</b>	£60	All coaches - end May 2023 (Previously only GM-registered)	£32k (Previously £16k)	£16k (Same as at consultation)
<b>Van</b>	£10	End May 2023 (Previously 31 Dec 2022)	Up to £4.5k (Previously £3.5k)	New £5k (No option at consultation)
<b>Minibus</b>	£10	End May 2023 (Previously 31 Dec 2022)	£5k (Same as at consultation)	New £5k (No option at consultation)
<b>Hackney carriage</b>	£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)
<b>PHV</b>	£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:

<sup>6</sup> Subject to joint GM and JAQU agreement on overall 'readiness', including that the Central Charging Portal and national Vehicle Checker is 'GM read'

<sup>7</sup> Subject to joint GM and JAQU agreement on overall 'readiness', including that the Central Charging Portal and national Vehicle Checker is 'GM read'

- 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.<sup>8</sup>
- 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<sup>9</sup> 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

<sup>8</sup> Further information is available in the GMCA report for the 25 June 2021 GMCA meeting

<sup>9</sup> 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](http://gmtaxistandards.com/minimum-licensing-standards)



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	<b>Change</b>
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	<b>Change</b>
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'.	<b>Change</b>
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	<b>Change</b>
8.35	Buses should be permanently exempted from the CAZ	No change
8.36	Hackney carriages and PHVs should be permanently exempt	No change

8.37	Other vehicles should be permanently exempt	<b>Change</b>
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	<b>Change</b>
8.42	Lead in time/availability/retrofit capacity resulting in delays of upgrades to compliant alternatives of over 12 weeks	<b>Change</b>
8.43	Temporary exemptions should be offered to those coach operators based outside GM but operating within it.	<b>Change</b>
8.44	Temporary exemptions should be offered to all GM licensed hackneys and private hire vehicles	<b>Change</b>
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.	<b>Change</b>
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)	<b>Change</b>
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	<b>Change</b>
9.12	Vehicles that operate in GM and will be affected should be eligible for funding support (including those beyond the boundary)	<b>Change</b>

9.13	More funding for buses should be available	No change
9.14	Funding should only be available for smaller bus companies	<b>Change</b>
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	<b>Change</b>
9.17	The eligibility criteria should not inadvertently exclude buses operating on school services	<b>Change</b>
9.18	Funding for HGVs should be higher/current funding amount won't help/ can't afford to upgrade	<b>Change</b>
9.19	Funding for leisure vehicles should be increased due to unaffordability of upgrade	<b>Change</b>
9.20	Funding for LGVs should be higher due to unaffordability to upgrade	<b>Change</b>
9.21	Funding for coaches should be higher due to unaffordability of upgrade	<b>Change</b>
9.22	Funding for minibuses should be higher due to unaffordability to upgrade	<b>Change</b>
9.23	Funding for Hackney Carriages should be higher due to affordability to upgrade	<b>Change</b>
9.24	Electric Hackney Carriages are not suitable, the infrastructure is not in place	<b>Change</b>
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	<b>Change</b>
9.27	Funding should be higher for PHVs due to unaffordability of upgrade	<b>Change</b>
9.28	Opposition to the Try-Before-You-Buy (TBYB) Hackney Carriage Scheme	<b>Change</b>
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	<b>Change</b>
9.31	General opposition to the Hardship fund	<b>Change</b>
9.32	General opposition to the Hardship fund – disagree with the daily charges/won't help those affected	<b>Change</b>
9.33	Concerns about abuse/management of the Hardship Fund	<b>Change</b>
9.34	Hardship funding should be prioritised for those who need it most/smaller businesses/voluntary sector etc.	<b>Change</b>

## 2 Background

2.1 Government has instructed many local authorities across the UK to take quick action to reduce harmful Nitrogen Dioxide (NO<sub>2</sub>) 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<sub>2</sub> Exceedances at the Roadside, referred to as the GM CAP.

2.2 On 16 March 2020 the Government issued a direction<sup>10</sup> 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<sub>2</sub> compliance for the areas for which they are responsible.

3.2 the authorities must ensure that the local plan for NO<sub>2</sub> 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<sub>2</sub> 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 measures of which are summarised in Schedule 1”<sup>11</sup>.

2.3 Schedule 1, Summary of local plan for NO<sub>2</sub> 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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<sup>10</sup> The full direction can be found here: <https://democracy.manchester.gov.uk/documents/s18580/Appendix%20%20-%20Greater%20Manchester%20NO2%20Plan%20Direction.pdf>

<sup>11</sup> 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<sub>2</sub> in Greater Manchester that have been forecast to exceed the legal Limit Value (40 µg/m<sup>3</sup>) identified through the target determination process<sup>12</sup> 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<sub>2</sub> 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<sup>13</sup> 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<sup>14</sup> 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<sup>15</sup>.
- 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.

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<sup>12</sup> The Target determination process used modelling to show that illegal levels of NO<sub>2</sub> will span all GM local authorities in 2021 if no action is taken. The extent of the air quality problem was agreed with Government.

<sup>13</sup> 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.

<sup>14</sup> The information provided at the conversation, as well as the summary of responses can be found here: [cleanairgm.com/technical-documents](https://cleanairgm.com/technical-documents)

<sup>15</sup> The AECOM GM Clean Air Plan Consultation report is published on [cleanairgm.com](https://cleanairgm.com)

3.6 The policy put forward at consultation can be found at [cleanairgm.com/technical-documents](https://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.

### 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<sup>16)</sup> 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<sup>17)</sup> 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 NO<sub>2</sub> 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<sub>2</sub> 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

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<sup>16</sup> Supplied as Appendix 3 in the June 2021 GMCA report

<sup>17</sup> Supplied as Appendix 3 in the June 2021 GMCA report

- 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 NO<sub>x</sub> 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 NO<sub>2</sub> 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:



- 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<sub>2</sub> 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<sub>2</sub> 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% NO<sub>x</sub> road transport emissions, and that LGVs are the second biggest contributor to illegal levels of NO<sub>2</sub>. 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.

- 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<sup>18</sup> 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](http://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<sup>19</sup> – 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<sup>16</sup>.
- 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:

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<sup>18</sup> 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.

<sup>19</sup> 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.

- 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<sup>20</sup>.
- 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.

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<sup>20</sup> 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.

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.

## **5 GM Minimum Licensing Standards for hackney carriages and private hire vehicles<sup>21</sup>**

- 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.

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<sup>21</sup> 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](http://gmtaxistandards.com/minimum-licensing-standards)

- 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](http://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<sup>22</sup>.
- 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<sup>23</sup>.
- 6.5 GM was not consulting on whether a GM-wide CAZ C should be implemented, as that is mandated by the Ministerial Direction<sup>24</sup>. 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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<sup>22</sup> 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](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/863730/clean-air-zone-framework-feb2020.pdf)

<sup>23</sup> These reports can be found on [cleanairgm.com](http://cleanairgm.com)

<sup>24</sup> 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.

- 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<sub>2</sub>) levels within legal limits in "the shortest possible time"<sup>25</sup>. 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<sup>26</sup>. 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<sup>27</sup>.

7.3.4 **Outcome:** No change in GM Clean Air Plan Policy.

### 7.4 **Comparisons between the GM CAP proposals and other UK schemes**

<sup>25</sup> [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/746095/air-quality-no2-plan-directions-2017.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/746095/air-quality-no2-plan-directions-2017.pdf)

<sup>26</sup> July 2020 GMCA report <https://democracy.greatermanchester-ca.gov.uk/documents/s8746/Clean%20Air%20consultation%20Final%202022.7.11.08am.pdf>

<sup>27</sup> <https://www.legislation.gov.uk/ukpga/2000/38/part/III/chapter/I/crossheading/charging-schemes>

- 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<sup>28</sup> to take action to take NO<sub>2</sub> levels over a number of years into the future in order to demonstrate compliance with legal limits<sup>29</sup>, 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<sub>2</sub> 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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<sup>28</sup> 16 March 2020 Ministerial Direction <https://democracy.greatermanchester-ca.gov.uk/documents/s8746/Clean%20Air%20consultation%20Final%202022.7.11.08am.pdf>

<sup>29</sup> The modelling approved by government of NO<sub>2</sub> 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<sup>30</sup>, 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<sub>2</sub> 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<sup>31</sup>.
- 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.<sup>32</sup> 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 25<sup>th</sup> 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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<sup>30</sup> [Strategic Case \(ctfassets.net\)](https://assets.ctfassets.net/tlpqgvvy1k6h2/21Gu3GqIPyBUO7VNvFGuZO/e38a10f200eaa72e435aa60c1c014d7b/30_-_GM_CAP_Alternative_Sensitivity_Test_Modelling_Summary_Note.pdf)

<sup>31</sup> [https://assets.ctfassets.net/tlpqgvvy1k6h2/21Gu3GqIPyBUO7VNvFGuZO/e38a10f200eaa72e435aa60c1c014d7b/30\\_-\\_GM\\_CAP\\_Alternative\\_Sensitivity\\_Test\\_Modelling\\_Summary\\_Note.pdf](https://assets.ctfassets.net/tlpqgvvy1k6h2/21Gu3GqIPyBUO7VNvFGuZO/e38a10f200eaa72e435aa60c1c014d7b/30_-_GM_CAP_Alternative_Sensitivity_Test_Modelling_Summary_Note.pdf)

<sup>32</sup> This report is available here:

[https://assets.ctfassets.net/tlpqgvvy1k6h2/21Gu3GqIPyBUO7VNvFGuZO/e38a10f200eaa72e435aa60c1c014d7b/30\\_-\\_GM\\_CAP\\_Alternative\\_Sensitivity\\_Test\\_Modelling\\_Summary\\_Note.pdf](https://assets.ctfassets.net/tlpqgvvy1k6h2/21Gu3GqIPyBUO7VNvFGuZO/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 NO<sub>2</sub> 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<sup>33</sup>, 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<sub>2</sub> 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**

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<sup>33</sup>[https://assets.ctfassets.net/nv7y93idf4jq/6HANAC6XKWnyvZ508tbVfq/f661cc31bad890a4f388de49e79c1826/CCTS\\_Full\\_Document\\_Final\\_170321.pdf](https://assets.ctfassets.net/nv7y93idf4jq/6HANAC6XKWnyvZ508tbVfq/f661cc31bad890a4f388de49e79c1826/CCTS_Full_Document_Final_170321.pdf)

- 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<sup>34</sup>.
- 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’<sup>35</sup> 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’<sup>36</sup>. 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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<sup>34</sup> Available at [Analytical Assurance Statement \(cdfassets.net\)](https://www.cdfassets.net)

<sup>35</sup> Supplied as Appendix 5 to the June GMCA Report ‘Greater Manchester Clean Air Plan’

<sup>36</sup> 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.

- 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 Report<sup>37</sup> 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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<sup>37</sup> 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 NO<sub>x</sub> 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<sub>2</sub> 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.

## **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.

- 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<sup>38</sup> 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.

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<sup>38</sup> Local Plan Transport Model Forecasting Report (T4) that can be found at: <https://cleanairgm.com/technical-documents>

- 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<sup>39</sup>, 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.

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<sup>39</sup> 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](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/863730/clean-air-zone-framework-feb2020.pdf)

- 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<sup>40</sup> (UK AQ Plan) states that, “unlike greenhouse gases, the risk from NO<sub>2</sub> 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<sub>2</sub> specifically, including those within GM, to undertake local action to consider the best option to meet legal NO<sub>2</sub> limits in the shortest possible time.
- 8.6.5 All ten of the Greater Manchester (GM) local authorities have received ministerial direction<sup>41</sup> to implement the local plan for securing compliance with the legal limits for nitrogen dioxide. The targeting of NO<sub>2</sub> 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<sub>2</sub>) or specify higher vehicle emission standards than those proposed. However the GM Air Quality Action Plan<sup>42</sup> 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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<sup>40</sup> 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>

<sup>41</sup> Environment Act 1995 (Greater Manchester) Air Quality Direction 2020. Available at: <https://democracy.manchester.gov.uk/documents/s18580/Appendix%20%20-%20Greater%20Manchester%20NO2%20Plan%20Direction.pdf>

<sup>42</sup> GM Air Quality Action Plan  
[https://secure.manchester.gov.uk/download/downloads/id/24676/greater\\_manchester\\_air\\_quality\\_action\\_plan\\_-\\_2016-2021.pdf](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<sup>43</sup>. 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<sub>2</sub> 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<sup>44</sup> (which was published with the consultation materials), a scheme affecting private cars on this geographical scale is unprecedented – GM covers 1,280 km<sup>2</sup> whereas in comparison the CAZ D (incl. private cars) scheme proposed in Birmingham covers just 8km<sup>2</sup>. 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<sub>2</sub> 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.

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<sup>43</sup>[https://assets.ctfassets.net/tlpgbvvy1k6h2/uCbNfiDpTY49uAUTFzVO/b3ae7ceb4e8be0dcb36008fba4939ce9/Options\\_Appraisal\\_Report.pdf](https://assets.ctfassets.net/tlpgbvvy1k6h2/uCbNfiDpTY49uAUTFzVO/b3ae7ceb4e8be0dcb36008fba4939ce9/Options_Appraisal_Report.pdf)

<sup>44</sup> 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/tlpgbvvy1k6h2/2WevOiPePeiHfkAHHQDr0e/54490777f9af51dd42d6e20139d73e9/17\\_-\\_GM\\_CAP\\_Evidence\\_supporting\\_the\\_decision\\_not\\_to\\_progress\\_with\\_a\\_GM-wide\\_CAZ\\_D.pdf](https://assets.ctfassets.net/tlpgbvvy1k6h2/2WevOiPePeiHfkAHHQDr0e/54490777f9af51dd42d6e20139d73e9/17_-_GM_CAP_Evidence_supporting_the_decision_not_to_progress_with_a_GM-wide_CAZ_D.pdf)

- 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<sup>45</sup> (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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<sup>45</sup> 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/tlpgbvy1k6h2/21Gu3GqIPyBUO7VNVfGuZO/e38a10f200eaa72e435aa60c1c014d7b/30\\_-\\_GM\\_CAP\\_Alternative\\_Sensitivity\\_Test\\_Modelling\\_Summary\\_Note.pdf](https://assets.ctfassets.net/tlpgbvy1k6h2/21Gu3GqIPyBUO7VNVfGuZO/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<sub>2</sub> 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<sup>46</sup>, 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<sub>2</sub> 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<sup>47</sup>. 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<sub>2</sub> 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.

<sup>46</sup> 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/tlpqbyv1k6h2/3UC4AhiPenRw3hdKjTYHTg/2fb88ead100e042bf756d0562b977266/Strategic\\_Case.pdf](https://assets.ctfassets.net/tlpqbyv1k6h2/3UC4AhiPenRw3hdKjTYHTg/2fb88ead100e042bf756d0562b977266/Strategic_Case.pdf)

<sup>47</sup> The Options Appraisal report can be found here: [cleanairgm.com/technical-documents](https://cleanairgm.com/technical-documents)



- 8.8.5 GM's Transport Vision, as set out in the GM Transport Strategy 2040<sup>48</sup>, is for world class connections that support long-term, sustainable economic growth and access to opportunity for all. GM's 5 year Environment Plan<sup>49</sup> 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<sup>50</sup>, 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<sub>2</sub> 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<sub>2</sub> 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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<sup>48</sup> <https://tfgm.com/2040-transport-strategy>

<sup>49</sup> [https://www.greatermanchester-ca.gov.uk/media/1975/5\\_year\\_plan\\_exec\\_summ\\_digital.pdf](https://www.greatermanchester-ca.gov.uk/media/1975/5_year_plan_exec_summ_digital.pdf)

<sup>50</sup> TfGM. 2021. The Bee Network. Available at: <https://activetravel.tfgm.com/bee-network-vision/>

- 8.9.5 The geographic scale of the zone (almost 1,300km<sup>2</sup>) 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<sup>51</sup> 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<sub>2</sub> has historically been exceeded at a large number of locations across Greater Manchester.
- 8.10.3 Air Quality Modelling<sup>52</sup> carried out in support of the GM CAP shows that, without action, GM is not expected to comply with legal limits for NO<sub>2</sub> 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<sub>2</sub> 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

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<sup>51</sup> Subject to joint GM and JAQU agreement on overall 'readiness', including that the Central Charging Portal and national Vehicle Checker is 'GM ready'

<sup>52</sup> Which can be found in document AQ3 on <https://cleanairgm.com/technical-documents/#2020-clean-air-plan-consultation>

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<sup>53</sup>.

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.

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<sup>53</sup> <https://www.legislation.gov.uk/ukpga/2000/38/part/III/chapter/I/crossheading/charging-schemes>

- 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<sub>2</sub> concentrations are predicted to exceed the legal Limit Value in all 10 Greater Manchester local authorities. As 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<sub>2</sub> 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.

- 8.14.6 **Outcome:** No change in GM Clean Air Plan Policy, the GM-wide approach set out in the Options Appraisal Report<sup>54</sup> 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<sub>2</sub>. 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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<sup>54</sup>[https://assets.ctfassets.net/tlpqgvv1k6h2/uCbNfiDpTY49uAUTFEzVO/b3ae7ceb4e8be0dcb36008fba4939ce9/Options\\_Appraisal\\_Report.pdf](https://assets.ctfassets.net/tlpqgvv1k6h2/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<sup>55</sup> 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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<sup>55</sup> 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..

- 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 a residential area 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<sup>56</sup>, 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.

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<sup>56</sup>[https://assets.ctfassets.net/1pgbv1k6h2/4GHuHasUCnfnv6oRfIINHku/1fc85978e017bebaf47cb95bc1e72dfc/GM\\_CAP\\_Study\\_Traffic\\_Impact\\_on\\_Neighbouring\\_Authorities.pdf](https://assets.ctfassets.net/1pgbv1k6h2/4GHuHasUCnfnv6oRfIINHku/1fc85978e017bebaf47cb95bc1e72dfc/GM_CAP_Study_Traffic_Impact_on_Neighbouring_Authorities.pdf)



- 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<sup>57</sup>.
- 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<sub>2</sub> 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)<sup>58</sup>, 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<sub>2</sub> 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.

<sup>57</sup> [https://assets.ctfassets.net/tlpqbyv1k6h2/3UC4AhiPenRw3hdKjTYHTq/2fb88ead100e042bf756d0562b977266/Strategic\\_Case.pdf](https://assets.ctfassets.net/tlpqbyv1k6h2/3UC4AhiPenRw3hdKjTYHTq/2fb88ead100e042bf756d0562b977266/Strategic_Case.pdf)

<sup>58</sup> 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](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<sub>2</sub> 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).

- 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<sub>2</sub><sup>59</sup> 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<sub>2</sub> 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.

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<sup>59</sup> The EU Ambient Air Quality Directive set the Legal Limit value of an annual mean of 40ug/m<sup>3</sup>, 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.

- 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 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.

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<sup>60</sup>. 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<sup>61</sup> 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).

<sup>60</sup> 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 \(ctfassets.net\)](#)

<sup>61</sup> <https://assets.ctfassets.net/tlpqbvy1k6h2/77frjZSqdKGLiyDwCUrmev/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<sup>62</sup>.
- 8.22.5 Modelling of the Policy for Consultation, as set out in T4 (Option for Consultation)<sup>63</sup>, 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<sup>64</sup> 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.

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<sup>62</sup> [Vehicle Population Estimates Note \(37\) \(ctfassets.net\)](#)

<sup>63</sup> [GM CAP Option for Consultation - Local Plan Air Quality Modelling Tracking Table \(T4\) \(ctfassets.net\)](#)

<sup>64</sup> [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/863730/clean-air-zone-framework-feb2020.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/863730/clean-air-zone-framework-feb2020.pdf)

- 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<sup>65</sup> 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.

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<sup>65</sup> [Technical Documents | Clean Air Greater Manchester \(cleanairgm.com\)](https://www.cleanairgm.com)

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 NO<sub>x</sub> emissions. In GM, buses emit in the region of 8% of the net NO<sub>x</sub> vehicle emissions overall. In the Regional Centre, bus emissions are predicted to produce 62% of total NO<sub>x</sub> 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.

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<sup>66</sup>. 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.

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<sup>66</sup> All available at [Technical Documents | Clean Air Greater Manchester \(cleanairgm.com\)](https://www.cleanairgm.com/Technical-Documents)



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.

- 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<sup>67</sup>’ 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**

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<sup>67</sup> This information is recorded in DVLA records.

- 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.

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.

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<sup>68</sup> 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<sup>69</sup>, 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<sup>70</sup> 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<sub>2</sub> 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.

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<sup>68</sup>[https://images.ctfassets.net/tlpgbvy1k6h2/6WIPEVFCSUB1rYQHxN4EYv/8b327d3e47aff8480643f8ccd1e48fbd/Data\\_Evidence\\_and\\_Modelling\\_-\\_Consultation\\_Summary\\_Report.pdf](https://images.ctfassets.net/tlpgbvy1k6h2/6WIPEVFCSUB1rYQHxN4EYv/8b327d3e47aff8480643f8ccd1e48fbd/Data_Evidence_and_Modelling_-_Consultation_Summary_Report.pdf)

<sup>69</sup> [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/863730/clean-air-zone-framework-feb2020.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/863730/clean-air-zone-framework-feb2020.pdf)

<sup>70</sup>[https://images.ctfassets.net/tlpgbvy1k6h2/6WIPEVFCSUB1rYQHxN4EYv/8b327d3e47aff8480643f8ccd1e48fbd/Data\\_Evidence\\_and\\_Modelling\\_-\\_Consultation\\_Summary\\_Report.pdf](https://images.ctfassets.net/tlpgbvy1k6h2/6WIPEVFCSUB1rYQHxN4EYv/8b327d3e47aff8480643f8ccd1e48fbd/Data_Evidence_and_Modelling_-_Consultation_Summary_Report.pdf)

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<sub>x</sub> emissions and that are included within the Government's Clean Air Framework<sup>71</sup> 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:

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<sup>71</sup> [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/863730/clean-air-zone-framework-feb2020.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/863730/clean-air-zone-framework-feb2020.pdf)

- 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 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. Respondents also commented on how all vehicles contribute to air pollution and should not be exempt, including emergency service and disabled vehicles.

- 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<sup>72</sup>, 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<sup>73</sup>, 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.

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<sup>72</sup> Available at [Technical Documents | Clean Air Greater Manchester \(cleanairgm.com\)](#)

<sup>73</sup> It is anticipated that, once implemented, the Clean Air Zone will remain in full operation until at least the second half of 2026.



- 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<sup>74</sup>, 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<sup>75</sup>.

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<sup>74</sup> All technical reports are available here: <https://cleanairgm.com/technical-documents>

<sup>75</sup> For further discussion and evidence on the impacts of Covid-19, see the 'Impacts of Covid-19 on the GM CAP Report'.

- 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.

- 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.

- 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**

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**

- 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 GM 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<sup>76</sup>, 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.

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<sup>76</sup> See Technical Note 38 Discounts and Exemptions at [Vehicle Population Estimates Note \(37\) \(ctfassets.net\)](#)

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.

- 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 carriage 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.



- 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.

- 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.

DRAFT FOR APPROVAL

## 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.

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<sup>77</sup>, 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**

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<sup>77</sup> See Technical Notes considering each vehicle type, available at [Technical Documents | Clean Air Greater Manchester \(cleanairgm.com\)](#)

- 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<sub>2</sub> 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.<sup>78</sup>
- 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.

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<sup>78</sup> TfGM, 2019. Greater Manchester's Outline Business Case to tackle Nitrogen Dioxide Exceedances at the Roadside. Analysis of Distributional Impacts

- 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<sup>79</sup>.
- 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.

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<sup>79</sup> 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/>

- 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 providers 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.

- 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.



- 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.

- 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<sup>80</sup>. 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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<sup>80</sup> [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/863730/clean-air-zone-framework-feb2020.pdf](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.

- 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”<sup>81</sup> which is consistent with GM CAP’s approach to target funding for vehicles registered in Greater Manchester.

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<sup>81</sup> 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](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<sup>82</sup> 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.

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<sup>82</sup> 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.

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<sub>2</sub> 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.

- 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<sub>2</sub> concentration limits in the shortest possible time"<sup>83</sup> 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.

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<sup>83</sup> Joint Air Quality Unity, Third Wave Local Authorities – Guidance: Options Appraisal, p. 8.

- 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 31<sup>st</sup> 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 31<sup>st</sup> March 2019 which expire on or by 31<sup>st</sup> July 2022 and which have not been renewed by GM for future services can apply for a temporary exemption to 31<sup>st</sup> 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).



- 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:

DRAFT FOR APPROVAL

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.

<sup>84</sup> 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.

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.

- 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.

- 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**

- 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<sup>85</sup>. 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

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<sup>85</sup> subject to operational viability and further discussion with retrofitters to confirm the capacity of the supply chain

- 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:

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) <sup>86</sup>	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

**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.

<sup>86</sup> A Zero Emissions Capable (ZEC) Vehicle is defined as having CO<sub>2</sub> 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, whilst 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<sub>2</sub> compliance and the overall objectives of the GM CAP.

- 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.

- 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

## 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 insufficient 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<sup>87</sup>.

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.<sup>88</sup> A Hardship Fund is, therefore, not included in the proposed final GM Clean Air Plan.

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<sup>87</sup> More information can be found here [be-ev.co.uk](http://be-ev.co.uk)

<sup>88</sup> Further information is available in the GMCA report for the 25 June 2021 GMCA meeting

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.**

- 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.

- 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<sup>89</sup>.

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<sup>89</sup> This document is supplied in Appendix 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) <sup>90</sup> . The detailed boundary can be found here: <a href="http://cleanairgm.com/clean-air-zone-map">cleanairgm.com/clean-air-zone-map</a>  Consultation to be undertaken on the inclusion of the A575 and A580 at Worsley <sup>91</sup> .
Clean Air Zone: Times of Operation	24 hours a day, 7 days a week The anticipated implementation date is Monday 30 May 2022 <sup>92</sup>
Clean Air Zone: Vehicles Affected	<ul style="list-style-type: none"> <li>• Licensed Hackney Carriage</li> <li>• Licensed Private Hire Vehicle</li> <li>• Bus</li> <li>• Coach</li> <li>• Minibus</li> <li>• LGV</li> <li>• HGV</li> </ul>

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

<sup>90</sup> 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>

<sup>91</sup> Originally this section of the A575 and A580 at Worsley was excluded at consultation.

<sup>92</sup> Subject to joint GM and JAQU agreement on overall 'readiness', including that the Central Charging Portal and national Vehicle Checker is 'GM ready'

	<p>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</p> <p>up to £10,000 towards a second-hand purpose-built WAV ZEC vehicle; OR,</p> <p>up to up to £5,000 towards a compliant purpose-built WAV vehicle (Euro 4 petrol or Euro 6 diesel or better).</p> <p>The following funding is available for upgrading a non-compliant taxi to a non-Wheelchair Accessible Vehicle:</p> <p>up to £5,000 towards retrofit to a compliant standard via a Clean Vehicle Retrofit Accreditation Scheme (CVRAS) certified system; OR</p> <p>up to £6,000 towards the running costs of a new Zero Emissions Capable (ZEC) ZEC vehicle; OR</p> <p>up to £6,000 towards a second-hand ZEC vehicle; OR</p> <p>up to £3,000 towards a compliant vehicle (Euro 4 petrol or Euro 6 diesel or better)</p> <p>Limit of 5 vehicles per applicant.</p> <p>GM estimates that the funding of £9.5m, received from Government would provide funding to upgrade around 1,130 vehicles.</p>
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**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	<p>The following funding is available for upgrading a non-compliant Private Hire Vehicle to a purpose-built Wheelchair Accessible Vehicle (WAV):</p> <p>up to £5,000 towards retrofit to a compliant standard via a Clean Vehicle Retrofit Accreditation Scheme (CVRAS) certified system; OR</p>

	<p>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</p> <p>up to £10,000 towards a second-hand purpose-built WAV ZEC vehicle; OR,</p> <p>up to up to £5,000 towards a compliant purpose-built WAV vehicle (Euro 4 petrol or Euro 6 diesel or better).</p> <p>The following funding is available for upgrading a non-compliant taxi to a non-Wheelchair Accessible Vehicle:</p> <p>up to £5,000 towards retrofit to a compliant standard via a Clean Vehicle Retrofit Accreditation Scheme (CVRAS) certified system; OR</p> <p>up to £6,000 towards the running costs of a new Zero Emissions Capable (ZEC) ZEC vehicle; OR</p> <p>up to £6,000 towards a second-hand ZEC vehicle; OR</p> <p>up to £3,000 towards a compliant vehicle (Euro 4 petrol or Euro 6 diesel or better)</p> <p>Limit of 5 vehicles per applicant.</p> <p>GM estimates that the funding of £10.2m, received from Government would provide funding to upgrade around 3,075 vehicles.</p>
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**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	<p>There will be permanent exemptions for Heritage buses not used for hire and reward and driver training buses.</p> <p>Buses used on a GM school bus service tendered prior to March 2019 will have a temporary exemption that will end in July 2022.</p>
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

	<p>TBC - Bus replacement - Up to £16,000 for purchase or lease of a compliant vehicle</p> <p>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).</p>
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#### 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	<p>A grant of £32,000 per vehicle for replacement OR access to vehicle finance.</p> <p>OR a grant of up to £16,000 towards retrofit to a compliant standard via a Clean Vehicle Retrofit Accreditation Scheme (CVRAS)</p> <p>Limit of 5 vehicles per applicant.</p> <p>Government have provided funding of £4.4m, which would provide funding to upgrade around 174 vehicles.</p>

#### 11.7 Proposals for Minibuses – Government has awarded GM £2 million.

Clean Air Zone: Exemptions	<p>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.</p> <p>Minibuses specially adapted for a disabled user will be permanently exempted.</p> <p>Minibuses will be eligible for a temporary exemption until 31 May 2023.</p>
Clean Air Zone: Discounts	None
Clean Air Zone: Daily Charge	£10 per charging day (midnight to midnight)
Clean Vehicle Funding	<p>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.</p> <p>Government has provided £2m in funding, which would provide funding to upgrade around 380 vehicles.</p>

**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:  <table> <tr> <td>&lt;7.5t</td> <td>£5,000</td> </tr> <tr> <td>&lt;18t</td> <td>£7,000</td> </tr> <tr> <td>&lt;26t</td> <td>£9,000</td> </tr> <tr> <td>&lt;32t</td> <td>£12,000</td> </tr> <tr> <td>&lt;44t</td> <td>£6,500</td> </tr> </table>	<7.5t	£5,000	<18t	£7,000	<26t	£9,000	<32t	£12,000	<44t	£6,500
<7.5t	£5,000										
<18t	£7,000										
<26t	£9,000										
<32t	£12,000										
<44t	£6,500										

	<p>per vehicle, dependent on vehicle size OR access to vehicle finance.</p> <p>OR a grant of up to £16,000 towards retrofit to a compliant standard via a Clean Vehicle Retrofit Accreditation Scheme (CVRAS)</p> <p>This would be limited to 5 vehicles per applicant.</p> <p>The Government fund received of £7.6m would provide funding to upgrade around 798 vehicles.</p>
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