

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

Participatory Policy Development - Summary of Stakeholder Engagement Report



Salford City Council



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1 Introduction

1.1 Background

- 1.1.1 The Government has instructed many local authorities across the UK to take quick action to reduce harmful roadside levels of Nitrogen Dioxide (NO₂) following the Secretary of State (SoS) for Environment, Food and Rural Affairs issuing a Direction under the Environment Act 1995 in 2017 requiring them to undertake feasibility studies to identify measures for reducing NO₂ concentrations to within legal limit values in the “shortest possible time”. In Greater Manchester, the 10 local authorities, the Greater Manchester Combined Authority (GMCA) and Transport for Greater Manchester (TfGM) are working together to develop a Clean Air Plan to tackle NO₂ exceedances at the roadside, herein known as the Greater Manchester Clean Air Plan (GM CAP).
- 1.1.2 In Summer 2021, GM authorities following the Government direction, agreed a plan to implement a charging Category C Clean Air Zone (CAZ), which relates to non-compliant buses, coaches, Heavy Good Vehicles, taxis, vans/LGV (Light Goods Vehicles) and minibuses to achieve compliance with legal limits for NO₂ on local roads in the shortest possible time and by 2024 at the latest. This will be referred to as the ‘Previous GM Clear Air Plan (CAP)’.
- 1.1.3 In January 2022, GM submitted evidence that the cost and availability of vehicles, particularly vans, meant that the Previous GM CAP was unworkable. By February 2022, the Government revoked the direction to implement a charging CAZ and gave a new direction to the GM authorities to review the Previous GM CAP and achieve compliance in the “shortest possible time and by no later than 2026”.
- 1.1.4 The Previous GM CAP has already taken steps to improve air quality across the city region through the launch of the Clean Bus Fund (CBF) and Clean HGV Fund in December 2020 and November 2021 respectively. As of January 2023;
- £15.1m awarded for the retrofit of 972 buses - 877 retrofits completed;
 - £1.2m awarded for the replacement of 75 buses - 69 compliant buses purchased;
 - 386 HGVs awarded funding to upgrade - 132 compliant HGVs purchased; and
 - 44 additional vehicles awarded funding where purchases had been made in anticipation of the Funds opening in early 2022.
- 1.1.5 Additionally £3.5m of GM CAP funding has been allocated to deliver 30 rapid charging points dedicated to support the taxi trade in GM, with the intention of encouraging transition to Zero Emission Capable vehicles.

- 1.1.6 In Summer 2022, GM set out that challenging economic conditions, rising vehicle prices and ongoing pandemic impacts meant that the original plan of a city-region charging CAZ was no longer the right solution to achieve compliance, instead proposing an investment-led, non-charging GM CAP.
- 1.1.7 The draft 'Case for a New Clean Air Plan' was submitted to the Secretary of State for Environment, Food and Rural Affairs on 1st July 2022. This set out that GM is to:
- 1) Invest in electric buses across the network and targeted at the last points of exceedance; and**
 - 2) Review funding to support upgrade to cleaner vehicles (targeting Category B vehicles). Category B vehicles include: buses, coaches, Hackneys / PHVs and HGVs. LGVs and minibuses are Category C vehicles.**
- 1.1.8 The submission did not provide a detailed design of the New GM CAP. However, it did outline that the 10 GM authorities were working to develop that detail collaboratively through a Participatory Policy Development (PPD) approach.
- 1.1.9 The PPD process approach has been undertaken so that GM can continue to work in partnership with stakeholders to deliver the best solutions.
- 1.1.10 It is important to note that GM will continue to engage with affected groups throughout the PPD process to ensure that it has been designed in collaboration with those affected by the scheme.

1.2 Objectives of the PPD Approach

- 1.2.1 The objectives of the PPD approach are detailed below:
- 1) Raise awareness and gather feedback on the proposed new GM CAP.
 - 2) Assess interest in funding and what factors are considered when purchasing a vehicle and any barriers (e.g. availability of vehicles, purchase costs, market conditions).
 - 3) Gather feedback on retaining funding principles from the previous CAP.
 - 4) Assess support for proposal to use Automatic Number Plate Recognition (ANPR) cameras to identify vehicles frequently travelling on routes where there are persistent exceedances.
 - 5) Explore perceptions and experiences of current vehicle market conditions, vehicle availability and costs of upgrading.

- 6) Understand what measures other than vehicle funding would help vehicle owners to upgrade.
 - 7) Understand unintended impacts of the proposed plan on people with protected characteristics GM-wide and within local geographies to inform the Equalities Impact Assessment.
 - 8) Understand any spatial considerations with particular emphasis on the locations where there are projected to be persistent exceedances in NO₂.
- 1.2.2 The submission set out that integral to the success of any New GM CAP is active engagement with those it will affect. Greater Manchester is committed to undertaking a participatory approach to the development of the New GM CAP to ensure that Greater Manchester's proposals consider evidence regarding deliverability and the impacts on affected groups.

1.3 PPD Approach - Process

- 1.3.1 The purpose of the PPD approach is to ensure that GM's proposals are well-grounded in evidence in terms of the circumstances of affected groups and possible impacts of the Plan on them, and therefore the deliverability and effectiveness of that Plan. The policy development process involves the following stages:
1. **Evidence Gathering** – including via stakeholder engagement, research, and the development of analytical tools and methods for estimating the impact of different policy measures;
 2. **Review of Evidence** – evidence gathered reviewed by GM to define the challenge and inform the development and assessment of different individual measures, policy options, proposed packages of measures and any recommendations;
 3. **Update to Policy for Consultation** – approve recommendations from the review process used to inform the policy development for public consultation.
 4. **Consultation** – Undertake consultation in-line with the principles for the review outlined by GM authorities in Spring 2022 and in accordance with good local authority practice, which will help to ensure impacts are understood and inform the ongoing equality impact analysis. The timescale for public consultation on the agreed plan will be put forward upon agreement with Government; and
 5. **Update to New GM CAP Policy for Approval** – GM will review the responses to the consultation and make any adaptations to the proposals as necessary. It is anticipated that local authorities could make a decision to proceed with the New GM CAP once the consultation process has concluded.

1.4 Purpose of the Report

- 1.4.1 The purpose of this report is provide an overview of the PPD approach and detail the stage 1 Evidence Gathering activities, as set out below.
- 1.4.2 There have been three strands of activity to the stage 1 Evidence Gathering participatory activity:
 1. Targeted engagement sessions with key stakeholders – vehicle-owning groups and other impacted individuals, such as community, business, environment and equality-based groups;
 2. An online survey with businesses and organisations who own or drive at least one type of vehicle from the three vehicle types; and
 3. Additional in-depth interviews with owners of vehicles which would be non-compliant under the proposed requirements for the GM CAP.
- 1.4.3 Transport for Greater Manchester (TfGM) on behalf of the 10 local authorities in Greater Manchester held the targeted engagement sessions. This report sets out the activity relating to targeted engagement, details the key stakeholder groups and summarises the feedback received in the sessions.
- 1.4.4 AECOM completed the online survey and in-depth interviews which have been reported separately and summarised in the “Participatory Policy Development - Online survey and in-depth interview report”.

1.5 Report Structure

- 1.5.1 Following this introduction, the document has been summarised into two sections:
 - Section 2 - Methodology and engagement format; and
 - Section 3 - Key points from targeted engagement.

2 Methodology

2.1 Identified Groups and Rationale

- 2.1.1 The ten local authorities in GM are dedicated to working in partnership with stakeholders and other transport bodies to deliver solutions that are area-specific and appropriate for GM.
- 2.1.2 Integral to the success of the New GM CAP is active engagement with those it will impact. GM has been committed to undertaking a participatory approach to the development of the New GM CAP to ensure the proposals are well-grounded in evidence concerning the circumstances of affected groups and possible impacts of the Plan on them.
- 2.1.3 The proposals which formed the Previous GM CAP in Summer 2021 were informed by evidence gathering through research, engagement and formal consultation. To continue this stakeholder partnership working with the direction of the New CAP, stakeholders were identified for the PPD approach covering five groups shown below:
- 1) Vehicle Owning Groups
 - 2) GM Business Representative Organisations (BROs)
 - 3) Equality, and Voluntary, Community and Social Enterprise (VCSE) Groups
 - 4) Health and Environment Groups
 - 5) Neighbouring Local Authorities
- 2.1.4 The following stakeholders were contacted for an engagement session, but either did not want to participate in the engagement at this time or a session was unable to be arranged:
- Federation of Builders
 - Association of Plumbing and Heating Contractors
 - Electrical Contractors Association
 - North West Business Leadership Team
 - GM Disabled People's Panel
 - GM Faith and Belief Advisory Panel
 - GM LGBTQ+ Equality Panel
 - GM Women and Girls' Equality Panel
 - Age UK Salford
 - Blackburn with Darwen Borough Council
 - Calderdale Council
 - Chorley Council
 - Derbyshire County Council
 - Kirklees Council
 - West Yorkshire Combined Authority

2.1.5 Stakeholders which participated in an engagement session are shown in **Figure 1¹**

Figure 1 Stakeholder groups and stakeholders engaged with in the PPD approach

Neighbouring Local Authorities	Vehicle Owning Groups	Equalities and Voluntary, Community, Social Enterprise (VCSE) Groups
<ul style="list-style-type: none">• Cheshire East Council• High Peak Borough Council• Lancashire County Council• Liverpool City Region Combined Authority (LCRA)• Rossendale Borough Council• St Helens Borough Council• Warrington Borough Council	<ul style="list-style-type: none">• Road Haulage Association (RHA)• Confederation of Passenger Transport (CPT)• One Bus• Community Transport Association (CTA)• Institute of Couriers• Finishes and Interiors Sector• Hackneys - Hackney Drivers Association, local authority representatives and operators• PHVs - National Private Hire & Taxi Association, local authority representatives and operators	<ul style="list-style-type: none">• GM Older People's Panel• GM Race Equality Panel• GM Equality Alliance• GM Disability Design Reference Group (DDRG)• 10GM• GM Voluntary, Community, Faith and Social Enterprise (VCFSE) Leadership Group• Youth Leadership Group
Health and Environment Groups		GM Business Representative Organisations (BROs)
<ul style="list-style-type: none">• Directors of Public Health• Asthma & Lung UK• Caribbean African Health Network (CAHN)• Friends of the Earth• Clean Cities Campaign		

2.1.6 The dates of each targeted engagement session can be found in **Appendix A.**

2.1.7 GM has also been undertaking introductory meetings with stakeholders that did not constitute as standalone targeted engagement sessions. Introductory meetings have taken place with: GM BROs as convened through the GM Local Enterprise Partnership (LEP) Chair, meetings with the ten GM local authorities business representatives, GM Equality Panel Facilitators, GM Equality Officers, GM CAP Local Authority Equality Working Group and National Highways.

2.2 Session Format

2.2.1 The engagement sessions with the stakeholder groups were held either on video calls (Microsoft Teams / Zoom), or in person.

2.2.2 The sessions followed a similar layout:

- Welcome / Introduction;

¹ An initial meeting was held with the Interiors and Finishes sector however a planned follow-up targeted stakeholder session did not take place and thus are not included within Section 3 of this report.

- A PowerPoint presentation led by TfGM, on behalf of the ten GM local authorities, about the latest position of the GM CAP and next steps;
- Stakeholder groups given the opportunity to ask questions on the content presented; and
- Tailored questions presented to the stakeholder groups to gather feedback which will be fed into the policy development for the CAP.

2.2.3 The PowerPoint presentations presented to the stakeholders followed a similar layout and comprised the following material:

- **Overview on GM's current position regarding the CAP, including why a new plan is being developed.** The subject matter included: a summary of GM's current position with the New GM CAP submission, an overview of the new opportunities to tackle air quality including funding from Zero Emission Bus Regional Areas (ZEBRA) and City Region Sustainable Transport Settlement (CRSTS), and bus franchising, all of which were not available in summer 2021.
- **Details on what was offered under the Previous GM CAP.** For example, the stakeholders in the vehicle groups were shown a breakdown of the funding amounts in the Previous GM CAP for the different vehicle types; and
- **Seeking feedback from the groups on the elements of GM's proposal for an investment-led non-charging CAP.** Elements of the new proposal put forward to the groups included: proposed funding approach for all vehicle types, and whether the installed ANPR cameras (initially proposed to detect non-compliant vehicles travelling within GM who were liable to charge) could be used to inform eligibility for Clean Air funding.

2.2.4 At the end of the presentation stakeholders were asked for their feedback on the proposal for the investment-led non-charging CAP and were presented with a series of questions for discussion.

2.2.5 A summary of the notes recorded during the sessions were circulated with the attendees of the sessions to ensure an accurate reflection of the meeting had been recorded.

2.2.6 Any actions from the engagement sessions held with the stakeholder groups were also flagged and separately recorded. The actions were then addressed accordingly by the appropriate channels to keep the engagement ongoing between TfGM and the stakeholder groups.

3 Summary of Key Points from Targeted Engagement

- 3.1.1 This section outlines a summary of the key points emerging from discussions which took place with the targeted stakeholders. The below key points reflects feedback received from targeted engagement as opposed to statements made by TfGM or any other parties attending on behalf of the 10 GM local authorities.

Vehicle Owning Groups

HGVs
Road Haulage Association (RHA)
<p>The RHA is dedicated solely to road haulage. As a trade association it is responsible for campaigning, training, advice, information and business services for its members.</p>
<ul style="list-style-type: none">• Highlighted some concern about the availability of compliant vehicles and that compliant vehicle prices are on the rise, but the re-sale value of Euro 5 vehicles has declined. They suggested that the funding should be used for purchasing compliant vehicles rather than retrofitting as the lifespan is short for retrofitted vehicles.• Stated that there will be a natural decline in emissions and agreed that the residual hotspots would benefit from a targeted approach.• Felt that the funding principles would exclude larger businesses.• Would like GM to increase the cap on number of vehicles an operator can apply for funding.• Said that the use of ANPR cameras was a sensible strategy, and that they felt this would help reduce air pollution and identify these non-compliant vehicles across GM.• Concluded that the new investment led non-charging GM CAP was going in the right direction.

Coaches

Confederation of Passenger Transport (CPT)

The CPT is a trade association which represents the bus and coach industry across the UK. It influences governments, provides technical & operational support, regional support and representation for members and commercial partners.

- Participants support a non-charging investment-led CAP.
- Supportive of the potential for Clean Air Funds to be opened up to businesses based outside of Greater Manchester.
- Fund level offered to coaches (for retrofit and replacement) under the previous CAP was thought to be generous.
- Highlighted an issue in Summer 21 policy that new operators couldn't access funding because of the requirement for a minimum length of time to be operational/vehicle owner.
- Participants reported they would be interested in funding if it became available.
- Regarding use of ANPR cameras to target funding – some concerns around the use of data and how it might be used as the coach industry is dynamic, responsive to where contracts or demand is, and therefore can be hard to target.

Buses

OneBus

OneBus is a partnership of commercial bus operators in GM. There is a shared commitment to improve public transport across the GM region.

- Supportive of the investment-led, non-charging approach and felt it was a more positive approach and to move forward with all Clean Air funding. If scheme uses investment to achieve compliance rather than punitive measures, GM should be doing this as soon as possible.
- No concern was raised regarding retaining the funding principles, regarding The Clean Bus Fund, from the Summer 2021 plan.
- OneBus commented that they didn't believe there were any other measures that could further encourage bus operators to upgrade to cleaner vehicles commenting that by 2024 GM's bus network will be 100% franchised, so compliance will be achieved as non-Euro VI / zero emission buses won't be bid compliant.
- The use of ANPR cameras to target investment, in principle, sounded sensible.

Minibuses

Community Transport Association (CTA)

The CTA is a national charity which supports and represents providers of community transport across the UK.

- Supportive of the investment-led, non-charging approach.
- Highlighted it can take a community transport organisation 3 years to fund and source a new minibus. Emphasised that this sector is different from commercial operators as they do not operate for profit.
- There is an appetite within the sector to decarbonise their vehicles but the main barrier to doing so is the means to do so.

- Electric Vehicle Charging Infrastructure (EVCI) is another barrier to going electric – due to the size of vehicles largely being incompatible with charge points.
- GM needs to consider Community Transport (CT) as part of the solution to poor air quality – CT effectively reduces the number of trips taken by providing accessible journeys that would otherwise have to be taken in more frequent private hire journeys. Many vulnerable people cannot use public transport because of access; CT plugs the gap.

LGVs

Institute of Couriers

The Institute of Couriers is a government stakeholder organisation which is the voice for the courier and express delivery sector. They also provide individuals with recognition for their industry-related skills and standards.

- Stated that there were 25 billion parcel units delivered to door in 2019, compared with 53 billion parcels in 2021, in part due to a spike in home deliveries during the pandemic. Express courier companies made significant profits. The home delivery sector is different to regular van or truck deliveries and is pushing for vehicles less than 3 years old and towards electric.
- Increasing van operating costs from older vehicles is a key driver to upgrade. However, this factor is not as effective for express courier vans as they have a lower average mileage.

Hackneys

Engagement via GM Licensing Manager with trade representatives

Engagement with Hackney Drivers Association, local authority representatives and operators.

- Many cannot afford to upgrade, the trade has suffered financially since the pandemic, including impact on credit.
- CAP funding amount from the Previous GM CAP not sufficient to encourage to upgrade.
- Problems in the market for CAP-compliant vehicles; there is no second-hand market.
- There are a limited number of dealerships to upgrade vehicles.
- The trade-in value of Euro 5 vehicles is low – operators will take a hit by upgrading even with the grant at its current amount.
- Welcome tackling out-of-area vehicles.
- Electric Vehicle Charging Infrastructure (EVCI): it would not be beneficial to use funds to install more charge points - taxi membership rate was said to be expensive.
- Look into Bradford Council, who are offering equal funding to compliant and non-compliant vehicle owners.

PHVs

Engagement via GM Licensing Manager with trade representatives

Engagement with local authority representatives and operators.

- The trade has the same goals as GM authorities – no one wants dirty air, but funds need to be there to enable this.
- If measures are taken to address out-of-area drivers, this would require a significant transition period so as not to affect availability of drivers.
- Concerns that capping funds to 5 vehicles would damage the effort to upgrade as well as limit larger operators in upgrading vehicles.
- The costs of financing vehicles are rising as well as purchase price.
- Electric vehicle charging infrastructure is not adequate at the moment – it is not practical for operators (for example to spend two hours charging while not accepting jobs). Despite this, CAP funds should be used on vehicle upgrade rather than charging points.

PHVs

The Licensed Private Hire Car Association

A UK membership-based Trade Association which represents licensed private hire operators.

- It would be a reasonable approach to offer funds to those that are a non-GM licensed vehicle regularly dispatched to bookings within the GM boundary.
- Funding should help individuals to upgrade, not large fleet operators, given that the pandemic has had a huge financial impact.

GM Business Representative Organisations (BROs)

GM BROs

GM Chamber of Commerce and Federation of Small Businesses

GM Chamber of Commerce - Business member organisation committed to providing businesses with a platform to connect with other businesses, communicate their message and create opportunities for a skilled workforce.

Federation of Small Businesses - Business member organisation supporting smaller businesses to help them grow and succeed.

- The financial impacts of the pandemic are still being felt – many are struggling to access finance.
- Reported rising costs – in fuel, materials and staff.
- As the demand for Euro 6 vehicles is high, the trade-in value of Euro 4 has reduced.
- The investment-led approach was said to be more business friendly.
- Some businesses reported to have upgraded in anticipation of the CAZ.
- Concern regarding how GM will enforce or assure uptake of funds to upgrade vehicles.
- Communication of the investment-led plan will be key to ensuring it achieves what it set out to do.
- Inflation must be taken into account – but be aware that businesses experience much higher price rises than the BoE inflation rate would suggest.
- Do not underfund or the CAP risks being unsuccessful.
- Agree that targeting funds to those based outside of GM if they are regularly using routes of exceedances.

Neighbouring Authorities

Cheshire East Council

- Suggested that it could be more beneficial to target vehicles travelling into the specific exceedance areas.
- Concerns that the 60 non-retrofittable buses will be placed in Cheshire East's area or other rural areas.
- Suggested that in the grant policy, if a bus is non-retrofittable it should be removed all together. Stated that old non-compliant buses are heavy polluters and should be scrapped.
- Cheshire East are changing their taxi licensing standards; for vehicles to be Euro 6 and above, and a steer towards electric vehicles.
- Agreed that the non-charging investment led plan is positive for everyone, in this current economic climate.

High Peak Borough Council

- Supportive that the charging element of the Plan is no longer the proposed approach as this would have had disadvantages for High Peak.
- Would welcome the eligibility of funding opening up to businesses based outside GM (High Peak) but regularly travelling within the boundary. This would help to solve the matter of exceedances.

Lancashire County Council

- Clean Air Funds – keen to see eligibility opened up to businesses based outside GM (e.g. Lancashire) because they may regularly use those routes where there are exceedances and so would benefit from support to upgrade to compliance.
- Interested in what happens next regarding the CAZ signage, as this is where there is a lot of interest from the public.

Liverpool City Region Combined Authority

- Supportive of the new investment led non-charging plan.
- LCRCA are keen to be kept sighted on GM's Plans as they are concerned about the displacement effect of anything that GM do that could negatively impact the LCRCA region.

Rossendale Borough Council

- Members supported the approach for a non-charging investment-led CAP and were keen that businesses based in Rossendale were eligible to be able to apply for any funding.
- Use of ANPR cameras to target funding – keen to see the cameras used so the money used to install them does not go to waste.
- Use of ANPR cameras to assist in crime detection is a good idea, subject to a public consultation.

St Helens Borough Council

- St Helens representatives supported the approach for a non-charging investment-led CAP, as the previous charging zone could have negatively impacted businesses in St Helens significantly.
- Advised they have been awarded £650k funding by the Department for Environment, Food & Rural Affairs (DEFRA) to deliver grants to retrofit or replace polluting vehicles.

Warrington Borough Council

- Supported the approach for a non-charging investment-led CAP.
- Interested in what happens next regarding the CAZ signage, as this is where there is a lot of interest from the public.
- Interested to understand which services will be served by zero emission buses particularly the 100 service from Warrington to Manchester.

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Equalities and VCSE (Voluntary, Community and Social Enterprise sector) Groups

Equality Groups
GM Older People's Equality Panel
A membership organisation which focuses on providing opportunity for people aged 50 or over to join with others to be a strong voice to influence decision making on key issues.
<ul style="list-style-type: none">• Members had knowledge of people having asthma attacks when they go outside.• GM should investigate new technology to reduce visits to hospital and reduce travel – virtual wards.• Concern over the reduction of small buses and community transport services that older people rely on.• Would like to see funding extended to include minibuses as many community groups rely on these.• ANPR cameras have been a large investment and should be shut down if not near an area of exceedance.• Members felt that diesel train engines at Victoria and Piccadilly stations should be addressed.

Equality Groups

GM Race Equality Panel

The Panel work to promote racial equality, tackle racial discrimination and foster positive relationships between ethnically diverse communities, and embed the Public Sector Equality Duty in policies, processes, procedures, practices and people development.

- Agree in principle with the investment-led approach.
- More should be done to encourage use of public transport in support of clean air, however some are still not confident in sharing closed spaces with others in the aftermath of the pandemic, particularly those with long-term health conditions.
- Highlighted that for example Caribbean and African communities experience socio-economic disadvantages linked to clean air – health impacts of traffic and Covid.
- Interest in co-production of the Equality Impact Assessment of the CAP, and the data that will inform it e.g. respiratory illness.

Equality Groups

GM Equality Alliance

The Alliance is a coalition of organisations and individuals drawn from a wide range of communities of experience across GM. The GMEquality Alliance serves to connect communities to policy makers, and vice versa, to assist with strategic equality and diversity work within the sub-region.

- There were concerns amongst the taxi community regarding the Previous GM CAP.
- There were also concerns amongst disabled people with blue badges who use large or specialist vehicles regarding exemptions to the previous CAZ charges. It was clarified that if there are no charges, there would be no need to apply for an exemption.
- Consideration should be given to the source of electricity for electric buses to ensure carbon neutrality.
- Electric buses can cause issues for deaf / sight impaired, so such groups should be considered in scheme design.

Equality Groups

TfGM Disability Design Reference Group (DDRG)

The DDRG provide advice from their own lived experience, which assists TfGM to ensure that, as far as possible, an inclusive, barrier-free environment is developed across public transport and active travel in GM.

- Support the new approach of an investment-led plan.
- More publicity and communications needed to show how dangerous NO₂ is on public health. Specific examples were made regarding asthma sufferers unable to get out and about and fatal asthma attacks.
- Designs of electric buses need to be accessible and designed so all members of the public are accommodated. For example, disabled people are isolated.
- Look into bus customer journey experience and customer service. Buses are better options than cars and need to make people feel safe on public transport.
- Should be sorted sooner rather than later due to the cost of signage and ANPR cameras.

Equality Groups

GM Youth Network

The network influence change on the issues that matter to them in their local communities. The Group currently support groups to campaign and provide consultations to other groups and organisations on issues including employment, health, special educational needs and disabilities (SEND), and experiences of care.

- The dangerous effects of poor air quality on public health should be communicated more widely.
- Fining people for not having the right standard of vehicle is not the fairest way of addressing poor air quality.
- The application process should be made simple to complete in order to be granted funding to upgrade vehicles.
- Perception that EV technology is not there yet in terms of being able to fulfil the needs of drivers. Ambition to move to EV should be had when technology is improved and more EVCI installed.
- The group made a number of suggestions around improvements to public transport provision that should be made if GM is to support improvements to air quality. These were as follows:
 - Routes and timings of public transport must be expanded – to night-time and into remote areas of GM.
 - Bus reliability needs to be addressed – taxis frequently make up the shortfall.
 - Would like to see fewer cars more generally. Public spaces are more enjoyable when they are not full of cars.
 - People should be able to access annual passes for public transport via regular payments rather than an upfront cost.
 - Would like to see financial incentive to purchase bicycles instead of cycle hire schemes.

VCSE

10GM

10GM is a joint venture to support the voluntary, community and social enterprise (VCSE) sector in GM. The founding members are: Action Together, Bolton CVS, Macc and Salford CVS. The organisation's shared purpose is to champion local voluntary and community action and social enterprise across the city-region in order to improve the economic, social and environmental wellbeing of gm's people and communities.

- Organisations in the VCSE sector, such as community transport, food banks, hospital service etc. are financially constrained, which limits their opportunity to engage with funding.
- Investing in a new vehicle is challenging for many VCSE organisations as long-term funding security may be uncertain, which adds risk to investment that a business may not experience.
- Concerns that organisations upgrading vehicles may pass the cost on to consumers, which could impact VCSE organisations and the individuals they help.
- Therefore, the investment-led, non-charging scheme is welcomed and will have less impact on the organisations that 10GM work with and those that they support.

VCSE

GM VCFSE Leadership Group

Coalition of sector leaders, promoting the role and involvement of the VCSE sector and communities in devolution. It comprises individuals from eighteen voluntary, community, faith, and social enterprise organisations from across GM.

- It is important to think about how community-led initiatives and CAP can support each other and contribute to an overall vision for GM, so that people at the local level feel that they are part of something bigger.
- Groups representing women and girls should be engaged in the development of the plan, including women of colour, of visible faith or with disabilities.
- There is a need to consider communication and public awareness at the same time as developing policy proposals. While buses are being made cleaner, women and girls will not use them if they are not considered safe. Transport should not be considered in isolation and there is a need to consider how to address other barriers to achieve a cultural shift.

Health and Environment Groups

Health Groups
Directors of Public Health (GM)
Public health leader representatives from the 10 GM local authorities.
<ul style="list-style-type: none">• The impact of air quality on health is very important and is a major driver of hospitalisations.• There are anxieties over the health impacts of log burner usage in the coming winter relating to the cost-of-living crisis.• GM Authorities and public health organisations need to consider how they can effectively frame the argument for improving air quality and spread the message to the public. This could include a move from raising awareness of mortality impacts to quality-of-life benefits.• ANPR cameras could be used to help enforce School Streets, Low Traffic Neighbourhoods or 20mph zones, or to understand progress against carbon reduction and net zero ambitions.• Public health professionals should feed into the scheme forecasting/modelling.• The impact of transport on carbon and air quality, and encouraging active travel remain public health priorities. The current iteration of the plan doesn't help with other health objectives as it focuses on NO_x exceedances.

Health Groups
Asthma + Lung UK
Charity organisation promoting the need for better lung health and tackling negative attitudes that hold back progress.

- Concern that there was not sufficient engagement undertaken with health professionals and those with health issues before the new plan was developed.
- Concern that delaying compliance until 2026 will have negative impacts due to ongoing poor air quality, such as extra deaths and increased rates of asthma.
- Other cities, such as Birmingham, Bristol and Bradford are achieving compliance faster with charging clean air zones.
- The new plan prioritises businesses rather than the health of individuals and those suffering the effects of poor air quality.
- GM should work with organisations such as the NHS to consider the impacts of their fleet vehicles on clean air and how they can contribute to the plan.
- Public transport accessibility should be improved and made cheaper to discourage car use.
- Concern that without the charging CAZ, there is no incentive for vehicle owners to upgrade.
- There needs to be greater emphasis on reducing levels of particulate matter (PM) as related health impacts are worse than thought. Whilst the plan addresses a legal requirement to reduce Nitrogen Oxide (NO_x), air quality can't be improved without reducing PM, so GMCA should take a more strategic long-term view.
- There is an issue around public understanding of clean air and the messages that are sent out. There needs to be a wider awareness of the issues and measures to reduce the levels of vehicles on the road rather than making engines cleaner.
- Other measures to accelerate air quality improvements should be considered, such as school air quality audits, public information campaigns using screens around GM or those at GP surgeries/hospitals and tougher anti-idling enforcement/penalties.
- Asthma + Lung UK would like a commitment by GM to embed ongoing engagement with health professionals, consultants, and Asthma + Lung UK as a permanent stakeholder group within the CAP development process.

Health Groups

Caribbean African Health Network (CAHN)

CAHN is a black-led organisation set up to address the wider social determinants to eradicate health disparities for Caribbean & African people in the United Kingdom.

- Suggested that stickers with a CAP logo could be distributed to those that have received funding to put on their vehicles to raise awareness of the funds.
- Costs imposed by the previous scheme would have impacted groups that CAHN represents. It is important to ensure that funding is available to groups to help them upgrade.
- Supportive of the plan and recognise the health benefits of improving air quality.
- Would like GM to investigate if air quality monitoring could be extended to local communities.
- Interest in how the sector can contribute to clean air, including the potential for social enterprises to distribute funding or support community led transport services.
- Ambassadors from the communities could be recruited to help raise awareness of the issues during a community workshop or event.

Environment Groups

Friends of the Earth

A membership organisation which focuses on protecting the natural world and the wellbeing of everyone in it. They are involved in providing resources and information, leading campaigns and driving solutions to environmental problems.

- The Plan is to reach EU exceedance level on nitrogen dioxide, but the air is still full of other gases, particulates etc. Why is GM not shooting for higher things?
- Technical question exceedances – on what concentration was GM considered compliance, confirmed as 40.4 ug/m³, – what happened to the precautionary 35 ug/m³ set out in the GM Air Quality Action Plan? Applied guidance as defined by JAQU following outcomes of legal challenges.
- Interested to know how GM plans to monitor the success of the CAP, for example if the current approach does not bring down exceedances.
- Private cars form a large part of the road-mix. Keen to understand why cars are not included in the plan. Attendees stated that it would be easier to switch out for sustainable journeys than commercial vehicles, e.g. a plumber can't get rid of his van.
- Interest in whether TfGM has conducted any work on a feasibility study of a possible Ultra Low Emission Zone (ULEZ) for the City Region.
- Comment that the GM investment-led CAP seems like a narrow approach regarding bringing down emissions. In the case to government there is no detail on, for example using last mile deliveries or other measures for Regent Road.
- The promotion of the GM CAP will be key – there needs to be more emphasis on why a CAP is needed. Members of the public last time believed that private cars were included.
- Friends of the Earth support the approach but, like with the previous Plan, believe it is not enough and will press Manchester City Council for a ULEZ.

Environment Groups

Clean Cities Campaign

The Clean Cities Campaign is a European coalition of organisations backed by Transport & Environment. The overall aim is to encourage cities to transition to zero-emission transport by 2030.

- The New GM CAP should fund the transition from LGVs to e-cargo bikes as they are greener and would offer lower costs.
- The new plan shows a lack of ambition as more could be done to achieve compliance sooner and plans should be implemented irrespective of costs, citing that the legal limits of nitrogen dioxide (NO₂) were set in 2010 and GM was now directed to compliance by 2026. In the meantime, the World Health Organisation (WHO) has revised the guidelines to be even lower (10 µg/m³).
- There should be greater clarity in the path to compliance, such as how the bus fleet will transition to electric year on year.
- Other measures should be implemented alongside funding, such as traffic-based measures, a city centre CAZ and a workplace parking levy.
- Other cities with high levels of low-income households, such as Bradford and Sheffield, are still implementing charging CAZs.
- A health impact assessment should be undertaken to identify the health impacts of delaying the CAP.
- The Government should be doing more to fund and support CAPs and have left local authorities to make tough decisions.
- A penalising element is the most effective way to guarantee change and critical to the success of the plan, otherwise it will be seen as optional.

Appendix A – Targeted Engaged Stakeholders for PPD (Aug – Nov 2022)

Organisation	Category	Sub-Category	Date of Meeting
Road Haulage Association (RHA)	Vehicle Groups	HGVs	14 th September 2022
Confederation of Passenger Transport (CPT)		Coaches	22 nd September 2022
OneBus		Buses	8 th September 2022
Community Transport Association (CTA)		Minibuses	24 th August 2022
Institute of Couriers		LGVs	9th September 2022
Engagement via Licensing Manager with trade representatives		Hackneys	8 th September 2022
Engagement via Licensing Manager with trade representatives		PHVs	7 th September 2022
Licensed Private Hire Car Association		PHVs	30 th September 2022
Cheshire East Council	Neighbouring Authorities	-	27 th October 2022
High Peak Borough Council			12 th August 2022
Lancashire County Council			9 th September 2022
Liverpool City Region Combined Authority (LCRCA)			9 th September 2022
Rossendale Borough Council			23 rd August 2022
St Helens Borough Council			15 th August 2022
Warrington Borough Council			5 th September 2022

Organisation	Category	Sub-Category	Date of Meeting
GM Chamber of Commerce and Federation of Small Businesses	Businesses	Businesses Representative Organisations (BROs)	13 th October
GM Older People's Equality Panel	Equality and VCSE Groups	Equality Groups	12 th September 2022
GM Race Equality Panel			11 th October 2022
GM Equality Alliance			22 nd September 2022
TfGM Disability Design Reference Group			8 th September 2022
GM Youth Network			14 th November 2022
10GM			30 th September 2022
GM VCFSE Leadership Group			14 th October 2022
Directors of Public Health	Health and Environment Groups	Health	27 th September 2022
Asthma + Lung UK			29 th September 2022
Caribbean African Health Network (CAHN)			30 th September 2022
Friends of the Earth		Environment	19 th October 2022
Clean Cities Campaign			23 rd November 2022