

## GM Air Quality Administration Committee

Date: 27 February 2023

Subject: GM Clean Air Plan – February 2023 Update

Report of: Councillor Eamonn O'Brien – Portfolio Lead for Clean Air

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### Purpose of Report

This report provides an update on the Case for a new Greater Manchester Clean Air Plan.

### Recommendations:

The Air Quality Administration Committee is requested to:

1. Note the latest position with Government.
2. Agree the report 'Greater Manchester's approach to address persistent exceedances of nitrogen dioxide identified on the A58 Bolton Road, Bury' attached as Appendix 3 as final to the Secretary of State.
3. Note the approach to modelling a Central Manchester CAZ as a benchmark.
4. Agree a delegation is made to the Chief Executive, GMCA and TfGM, in consultation with the Chair to approve the submission of proposals to support electric buses and to open up the funds for taxis and PHVs to the Government's Joint Air Quality Unit.
5. Note the Clean Air funding distribution to end January 2023 by Local Authority.
6. Note headlines from targeted engagement and research that was undertaken as part of the Participatory Policy Development activity at Appendix 4.
7. Note the update to deliver EV charge points funded by the GM CAP.

### Contact Officers

Eamonn Boylan – Chief Executive, GMCA and TfGM –  
eamonn.boylan@greatermanchester-ca.gov.uk

Simon Warburton – Transport Strategy Director, TfGM – simon.warburton@tfgm.com

Megan Black – Interim Head of Logistics & Environment –  
megan.black@tfgm.com

BOLTON  
BURY

MANCHESTER  
OLDHAM

ROCHDALE  
SALFORD

STOCKPORT  
TAMESIDE

TRAFFORD  
WIGAN

## **Equalities Impact, Carbon and Sustainability Assessment:**

The GM CAP is a place-based solution to tackle roadside NO<sub>2</sub> which will have a positive impact on carbon.

## **Risk Management**

Initial risk register set out in Clean Air Plan OBC (March 2019).

## **Legal Considerations**

On 8<sup>th</sup> February 2022 *The Environment Act 1995 (Greater Manchester) Air Quality Direction 2022* was issued. The new direction requires that the GM local authorities:

- review the measures specified in the existing Plan; and
- determine whether to propose any changes to the detailed design of those measures, or any additional measures.

The GM authorities must ensure that the Plan with any proposed changes will secure that:

- compliance with the legal limit value for NO<sub>2</sub> is achieved in the shortest possible time and by no later than 2026; and
- exposure to levels above the legal limit for NO<sub>2</sub> is reduced as quickly as possible.

This new direction revoked the direction dated March 2020 which required the ten Greater Manchester Local Authorities to implement a Category C Clean Air Zone to achieve compliance with the legal limit value for NO<sub>2</sub> in the shortest possible time and by 2024 at the latest.

## **Financial Consequences – Revenue**

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

## **Financial Consequences – Capital**

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

**Number of attachments to the report:** none

## **Comments/recommendations from Overview & Scrutiny Committee**

Not applicable.

## **Background Papers**

- 26 October 2022, Report for AQAC: GM Clean Air Plan – Expenditure Update
- 26 October 2022, Report for AQAC: GM Clean Air Plan – October 2022 Update
- 17 August 2022, Report for AQAC: GM Clean Air Plan – August 2022 Update
- 1 July 2022, Report for AQAC: GM Clean Air Plan – July 22 Update
- 23 March 2022, Report for AQAC: GM Clean Air Plan – March 22 Update
- 28 February 2022, Report for AQAC: GM Clean Air Plan – February 22 Update
- 2 February 2022, report to CACC: GM Clean Air Plan – update to the temporary exemption qualification date for GM-licensed hackney carriages and private hire vehicles
- 20 January 2022, report to AQAC: GM Clean Air Plan – A628/A57, Tameside – Trunk Road Charging Scheme update
- 20 January 2022, report to AQAC: GM Clean Air Plan – Financial Support Scheme Jan 22 Update
- 20 January 2022, report to AQAC: GM Clean Air Plan – Clean Air Zone Discount & Exemptions Applications
- 18 November 2021, report to AQAC: GM Clean Air Plan – GM Clean Air Funds assessment mechanism
- 18 November 2021, report to CACC: GM Clean Air Plan – GM Clean Air Plan Policy updates
- 13 October 2021, report to AQAC: GM Clean Air Plan – Operational Agreement for the Central Clean Air Service
- 13 October 2021, report to CACC: GM Clean Air Plan – Showmen’s Vehicle Exemption
- 13 October 2021, report to CACC: GM Clean Air Plan – Clean Air Zone daily charge refund policy
- 13 October 2021, report to CACC: GM Clean Air Plan – A628/A57, Tameside – Trunk Road Charging Scheme
- 21 September, report to AQAC: GM Clean Air Plan – Clean Air Zone: Camera and Sign Installation
- 21 September, report to AQAC: GM Clean Air Plan – Bus Replacement Funds
- 25 June 2021, report to GMCA: GM Clean Air Final Plan
- 31 January 2021, report to GMCA: GM Clean Air Plan: Consultation
- 31 July 2020, report to GMCA: Clean Air Plan Update

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

## **Tracking/ Process**

Does this report relate to a major strategic decision, as set out in the GMCA Constitution

No

## **Exemption from call in**

Are there any aspects in this report which means it should be considered to be exempt from call in by the relevant Scrutiny Committee on the grounds of urgency? No

**GM Transport Committee** – Not applicable

**Overview and Scrutiny Committee** – Not applicable

# 1 Background

- 1.1 The Government has instructed many local authorities across the UK to take quick action to reduce harmful Nitrogen Dioxide (NO<sub>2</sub>) levels following the Secretary of State (SoS) issuing a direction under the Environment Act 1995. 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 NO<sub>2</sub> Exceedances at the Roadside, herein known as Greater Manchester Clean Air Plan (GM CAP).
- 1.2 The development of the GM CAP is funded by Government and is overseen by Joint Air Quality Unit (JAQU), the joint DEFRA and DfT unit established to deliver national plans to improve air quality and meet legal limits. The costs related to the business case, implementation and operation of the GM CAP are either directly funded or underwritten by Government acting through JAQU and any net deficit over the life of the GM CAP will be covered by the New Burdens Doctrine, subject to a reasonableness test<sup>1</sup>.
- 1.3 The GM CAP is a package of measures to deliver NO<sub>2</sub> reductions to within legal limits within the shortest possible time and by 2026 at the latest.
- 1.4 Throughout the development of the GM Clean Air Plan the ten GM local Authorities have made clear the expectation that the UK Government would support the plans through:
- Clear arrangements and funding to develop workable, local vehicle scrappage / upgrade measures;
  - Short term effective interventions in vehicle and technology manufacturing and distribution, led by national Government;
  - Replacement of non-compliant buses; and
  - A clear instruction to Highways England<sup>2</sup> to implement measures which deliver compliance with legal limits for NO<sub>2</sub> on the strategic road network, for which they are responsible, in the shortest possible time<sup>3</sup>.
- 1.5 The GMCA Clean Air Update report of 29 May 2020<sup>2</sup> detailed that in March 2020 the government provided initial funding of £41m for clean vehicle funds to award grants or loans to eligible businesses: £15.4m for bus retrofit, £10.7m for Private

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<sup>1</sup> The new burdens doctrine is part of a suite of measures to ensure Council Tax payers do not face excessive increases. [New burdens doctrine: guidance for government departments - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/news/new-burdens-doctrine-guidance-for-government-departments)

<sup>2</sup> On 19 August 2021 it was announced that Highways England changed its name to 'National Highways' reflecting the new focus the company has on delivering the government's £27bn strategic roads investment programme, while also continuing to set highways standards for the whole UK.

<sup>3</sup> GM Authorities are directed to take action on the local road network. Those roads managed by National Highways, such as motorways and trunk roads are excluded from the Clean Air Plan.

Hire Vehicles, £8m for HGVs, £4.6m for coaches and £2.1m for minibuses. These figures include Joint Air Quality Unit (JAQU) estimated delivery costs at 5%.

- 1.6 The GMCA – Clean Air Final Plan report detailed that GM had been awarded £14.11m for Hackney Carriages and £73.5m for Light Goods Vehicles. The Hackney Carriage award comprises £10.61m to support grants and loans to upgrade vehicles. These figures include JAQU estimated delivery costs at 5%.
- 1.7 The GMCA – Clean Air Final Plan report on 25 June 2021<sup>4</sup> endorsed the GM Final Clean Air Plan and policy following a review of all of the information gathered through the GM CAP consultation and wider data, evidence and modelling work. This included the GM Clean Air Plan Policy, that outlined the boundary, discounts, exemptions, daily charges of the formerly proposed Clean Air Zone (CAZ) as well as the financial support packages offered towards upgrading to a compliant vehicle, including the eligibility criteria to be applied. The aim of the funding is to support an upgrade to a compliant vehicle and to mitigate the negative socio-economic effects of the former GM CAZ.
- 1.8 The 25 June 2021 GMCA report set out that the Air Quality Administration Committee has the authority to establish and distribute the funds set out in the agreed GM Clean Air Plan policy.
- 1.9 On 21 September 2021 the Air Quality Administration Committee approved the establishment and distribution of the bus replacement funds.
- 1.10 On 13 October 2021 the Air Quality Administration Committee agreed the distribution of Clean Air funds set out in the agreed GM Clean Air Plan policy as follows:
  - From 30 November 2021 applications for funding would open for HGVs.
  - Opened the funds to applications from LGV, Hackney, PHV and Minibus owners who were detrimentally impacted by the decision of the AQAC to defer the wider opening of the Financial Support Scheme.
- 1.11 On 18 November 2021 the Air Quality Administration Committee agreed the assessment mechanism to allow for Clean Air Funds to be adapted, if necessary (including a process for considering whether additional funding is required), if the impacts of the Clean Air Zone prove to be more severe than forecast once opened.

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<sup>4</sup> Also considered by the GM authorities through their own constitutional decision-making arrangements.

- 1.12 On 20 January 2022 the Air Quality Administration Committee considered the findings of an initial review of conditions within the supply chain of Light Good Vehicles which is impacting the availability of compliant vehicles. The Committee agreed that a request should be made to the Secretary of State (SoS) for Environment, Food and Rural Affairs to agree to pause the opening of the next phase of Clean Air Funds to enable an urgent and fundamental joint policy review with Government to identify how a revised policy can be agreed to deal with the supply issues and local businesses' ability to comply with the GM CAP.
- 1.13 On 28 February 2022 the Air Quality Administration Committee noted the submission of a report "*Issues Leading to Delayed Compliance Based on the Approved GM CAP Assumptions*", attached as Appendix 3. The report concluded that on balance, the latest emerging evidence suggests that with the Approved Plan [Summer 2021 Clean Air Plan] in place, it was no longer more likely than not that compliance would be achieved in 2024. The Government subsequently issued a new direction which stated that proposals for a revised plan were required to be submitted to the SoS by 1<sup>st</sup> of July, requiring the revised plan to achieve compliance with the legal limit value for NO<sub>2</sub> in the shortest possible time and by no later than 2026. The committee also noted the interim arrangements for delivery arrangements for the Clean Air Zone in the meantime, including signage, funding and discount/exemption applications.
- 1.14 On 23 March 2022 the Air Quality Administration Committee noted the scope of the review of the Clean Air Plan and the participatory policy development approach, as well as delivery arrangements, including signage and funding.
- 1.15 On 1 July 2022 the Air Quality Administration Committee noted the 'Case for a new Greater Manchester Clean Air Plan' document and associated appendices would be submitted to the Secretary of State on the 1 July as a draft document subject to any comments of Greater Manchester local authorities.
- 1.16 On 17 August the Air Quality Administration Committee agreed to submit the 'Case for a new Greater Manchester Clean Air Plan' to the Secretary of State as a final Case for a new Greater Manchester Clean Air Plan and Approved the Case for a New Plan - Air Quality Modelling Report for submission to the government's Joint Air Quality Unit.
- 1.17 On 26 October the Air Quality Administration Committee noted the non-compliant vehicles that have been upgraded through Clean Air Funds; the targeted engagement being undertaken with key stakeholders to inform the policy development process, that Greater Manchester Police have advised that the disclosure requests from the Clean Air Zone ANPR cameras have been very useful in detecting crime and the update on the funding received from Government, the expenditure made and the funding requirements that have emerged as the new Greater Manchester Clean Air Plan is developed.

## 2 Overview

2.1 The primary focus of the 'Case for a new Greater Manchester Clean Air Plan' is to identify a plan to achieve compliance in a way that considers the current cost-of-living crisis and associated economic challenge faced by businesses and residents. This would be achieved through an investment-led approach combined with all the wider measures that GM is implementing and aims to reduce NO<sub>2</sub> emissions to within legal limits, in the shortest possible time and at the latest by 2026. Unlike the previous charging-led scheme defined by Government guidance, the investment-led scheme seeks to factor in the cost-of-living crisis, it will actively consider the impacts of the pandemic and wider global economic instability on supply chains, can be delivered from summer 2023, and crucially considers the significant beneficial effects that the delivery of electric bus can have along key routes. In particular:

- The **cost-of-living crisis** means that businesses are less able to afford to invest in vehicle upgrades, whilst households are less able to absorb any costs that may be passed on to them.
- This is exacerbated by **rising vehicle prices** and – for some vehicle types – lower residual values of non-compliant vehicles. There is evidence that illustrates the demand for new and compliant second-hand vehicles is exceeding supply, leading to longer wait times and rising prices.
- A charging Clean Air Zone could therefore cause **unacceptable financial hardship** and contribute to business failures.
- In addition, **new opportunities have arisen** – via the approval of bus franchising and new funding for electric buses – this means that GM has the opportunity to tackle emissions in a different way.
- The exceedances become more localised in 2025 and 2026, therefore **action can be targeted** at those locations suffering the worst air quality.
- It is clear that the GM-wide Clean Air Zone category C as approved in summer 2021 could lead to hardship in GM and that implementing a materially revised charging CAZ, for example with a different boundary, vehicles in scope or discounts and exemptions, would take time to design and consult upon and then implement.

2.2 The 'Case for a new Greater Manchester Clean Air Plan' therefore proposes using the £120 million of Clean Air funding that the Government has awarded to Greater Manchester to deliver an investment-led approach to invest in vehicle upgrades, rather than imposing daily charges and in particular through the delivery of zero emission buses in the Bee Network (a London-style integrated transport network). The new plan would ensure that the reduction of harmful emissions is at the centre of GM's wider objectives.



### **3 Feedback from Government**

- 3.1 On 17 January 2023 the Mayor of Greater Manchester and the GM Clean Air Lead, Councillor Eamonn O'Brien met with Rebecca Pow, Minister for Environmental Quality and Resilience.
- 3.2 At the meeting the Mayor and Clean Air Lead set out that GM Leaders want to find a way forward and had been calling for the meeting since the Case for a New Clean Air Plan had been submitted in July 2022. Whilst noting that JAQU officials had written to TfGM on 16 December 2022 there had been no feedback from Ministers on the Case for a New Clean Air Plan.
- 3.3 Following this meeting, on 26 January 2023 the Minister wrote, see Appendix 1, confirming the ask of the Greater Manchester authorities to:
- (i) provide modelling results for a benchmark CAZ to address the persistent exceedances identified in central Manchester and Salford, in order for these to be compared against your proposals.*
  - (ii) Identify a suitable approach to address persistent exceedances identified in your data on the A58 Bolton Road in Bury in 2025, and to propose a suitable benchmark.*
  - (iii) Set out how the measures you have proposed will be modelled and evidenced overall, and to ensure that they are modelled without any unnecessary delay.*
- 3.4 GM Leaders have responded, see Appendix 2, in respect of point (ii) a report that identifies a suitable approach to address persistent exceedances identified on the A58 Bolton Road in Bury has been produced – see section 4.
- 3.5 In respect of points (i) and (iii), the response sets out that in terms of timing, it will take a number of months for the modelling tools to be updated, the benchmark to be run and the outputs to be governed. It is anticipated that benchmark CAZ modelling results to address the persistent exceedances identified in central Manchester and Salford and setting out the modelling methodology will be concluded by the end of June 2023.

### **4 An approach to address persistent exceedances on the A58 Bolton Road in Bury**

- 4.1 As outlined in para 3.4, Greater Manchester (GM) sent the Minister a report that identifies a suitable approach to address persistent exceedances identified on the A58 Bolton Road in Bury. The report was submitted as draft and subject to any comments of the Air Quality Administration Committee.

- 4.2 Although GM has been requested to model a charging CAZ as a benchmark to compare against the preferred GM option of an investment-led, non-charging Clean Air Plan, a CAZ benchmark is not appropriate at the A58 Bolton Road, Bury, due to the strategic nature of the traffic trips utilising this section of road, meaning a local urban centre focused CAZ would be ineffective. A CAZ on the section of the A58 where the exceedance is predicted would likely lead to significant re-routing.
- 4.3 The report, attached as Appendix 3, outlines GM's approach to address persistent exceedances of NO<sub>2</sub> identified on the A58 Bolton Road, Bury, setting out the results of modelling carried out in October to December 2022 to forecast air quality in GM in future years. However, it specifically addresses the exceedances predicted at the A58 Bolton Road, a site of persistent poor air quality predicted to remain in exceedance, without any GM CAP measures in place, until 2026.
- 4.4 The report sets out the tests against three incremental measures, delivering bus and taxi vehicle upgrades to improve air quality at the A58 and that GM has therefore prioritised the deployment of Zero Emission Buses, with the launch of the regulated bus system in Wigan and Bolton. The bus services which will be electrified account for 84% of the bus trips, and therefore exceed the target proportion which will be a major contributor to resolving exceedances at the A58 to secure compliance at this location.

## 5 Considerations for a CAZ benchmark scenario

- 5.1 The government has asked GM to: *Provide modelling results for a benchmark CAZ to address the persistent exceedances identified in central Manchester and Salford, in order for these to be compared against your proposals and set out how the measures you have proposed will be modelled and evidenced overall.*
- 5.2 Government have asked for this as they want to understand how Greater Manchester's case for an investment-led, non-charging Clean Air Plan, performs (in terms of delivering compliance) against the 'benchmark' of a charging Clean Air Zone. To model the performance of a benchmark CAZ the GM Authorities need to determine the following aspects:
- Spatial coverage of the CAZ (boundary over which charges apply);
  - Category of CAZ i.e. which vehicle types may be subject to charging – guidance states that the benchmark should be the lowest category of CAZ that achieves compliance in the year following its implementation;
  - Level of charge to be applied by vehicle type; and
  - First year from which the CAZ is operational and whether that is consistent across all vehicle types.
  - There are secondary considerations which would ideally also be determined:
    - Level and nature of any funding support for users / vehicles; and
    - Exemptions from charges.

- 5.3 Boundary – Most other CAZ schemes are focused on a relatively small area – typically the Central Business District or similar. In the Regional Centre the Inner Relief Route (IRR) forms a natural boundary to the central area, and aligns with the City Centre Transport Strategy. Modelling a CAZ within the IRR would minimise wider traffic reassignment impacts by non-compliant vehicles, and would primarily model those journeys with an origin or destination within the Regional Centre. Therefore, the proposed approach to model a CAZ boundary would be the area within the Inner Relief Route.
- 5.4 Category of CAZ – GM's starting point will be to benchmark a Category B zone (Bus/Coach/Taxi/PHV/HGV) as the lowest class of CAZ with the potential to achieve compliance in the year following implementation.
- 5.5 Level of charge to be applied by vehicle type – The table below sets out the charges for other schemes around the country. From this comparison, the charges included within the original plan are generally in line with other schemes around the country. It would therefore seem sensible to initially propose the previous charging regime as the basis for the benchmark scenario:
- Taxi/PHV £7.50
  - Bus/Coach/HGV £60
  - Van/Minibus £10

CAZ	CAZ Category	Cars	Taxis	Bus	LGV	HGV
Bath	C	-	£9.00	£100.00	£9.00	£100.00
Birmingham	D	£8.00	£8.00	£50.00	£8.00	£50.00
Bradford	C+	-	£7.00	£50.00	£9.00	£50.00
Bristol	D	£9.00	£9.00	£100.00	£9.00	£100.00
Newcastle	C	-	£12.50	£50.00	£12.50	£50.00
Portsmouth	B	-	£10.00	£50.00	-	£50.00
Sheffield	C	-	£10.00	£50.00	£10.00	£50.00
<b>GM 2021</b>	<b>C</b>	<b>-</b>	<b>£7.50</b>	<b>£60.00</b>	<b>£10.00</b>	<b>£60.00</b>
<i>Average</i>	<i>C</i>	<i>-</i>	<i>£9.20</i>	<i>£62.00</i>	<i>£10.10</i>	<i>£62.00</i>
<i>Average</i>	<i>all</i>	<i>£8.50</i>	<i>£9.13</i>	<i>£63.75</i>	<i>£9.64</i>	<i>£63.75</i>

- 5.6 Funding Support / Exemption from charges – It is proposed that the exemptions and grant values agreed under the 2021 GM CAP Policy are retained and grant values uplifted with inflation. The Bank of England November 2022 Monetary Report<sup>5</sup> shows the culmination of inflation between, the grant values being agreed in Summer 2021 to 2023 (when the funds could open) shows a likely 22.5% increase in costs associated with CPI inflation.
- 5.7 Operational date – The benchmark scenario requires a date from which the CAZ is operational. Implementation considerations around the time necessary to undertake a consultation and alter signing and camera locations make 2024 the earliest realistic year of opening.
- 5.8 The recommended approach to modelling a benchmark CAZ is as follows:

<b>Spatial coverage of the benchmark CAZ (boundary over which charges apply)</b>	Area within the Inner Relief Route
<b>Class of benchmark CAZ i.e. which vehicle types may be subject to charging</b>  The benchmarking scenario chosen should be the lowest class of charging CAZ that can deliver compliance in the year following implementation.	GM's starting point will be to benchmark a Category B zone (Bus/Coach/Taxi/PHV/HGV) as the lowest class of CAZ with the potential to achieve compliance in the year following implementation. JAQU have also requested that a Category C zone is modelled.
<b>Level of charge to be applied by vehicle type</b>	It is initially proposed to use the charges as set out within the 2021 plan - this is compatible with other northern cities <ul style="list-style-type: none"> <li>• Taxi/PHV £7.50</li> <li>• Bus/Coach/HGV £60</li> <li>• Van/Minibus £10</li> </ul>
<b>First year from which the benchmark CAZ could be operational and whether that is consistent across all vehicle types</b>	Given the considerations around the time necessary to undertake a consultation on a City Centre Charging CAZ and alter signing and camera locations 2024 is the earliest realistic year of opening.
<b>Level and nature of any funding support for users / vehicles</b>	It is proposed to use grant values as set out within the 2021 plan (as required by JAQU) and also to model grant values inflated by 22.5% The <i>Bank of England November 2022 Monetary Report</i> <sup>5</sup> shows culmination of inflation between, the grant values being agreed in Summer 2021 to 2023 (when the funds could open) shows a likely 22.5% increase in costs associated with CPI inflation.

<sup>5</sup> <https://www.bankofengland.co.uk/monetary-policy-report/2022/november-2022>

## 6 Proposals for Electric Bus & Opening Clean Taxi Fund (CTF)

- 6.1 Minister Pow set out in her letter that she would be “happy to consider the proposals you outlined regarding using present funding to support electric buses and to open up the funds for taxis and PHVs. I would be grateful if you could provide more details for us to consider. We will need to understand what contribution this will make towards securing compliance as quickly as possible within your plans, how it can be ensured funds are taken up as expected, and that the levels of funds remain appropriate within our funding frameworks for LAs.”
- 6.2 Hackney Carriage and PHV – Greater Manchester has been engaging with the trade about the possibility of funding to assist upgrades through the Clean Air Plan since the 2019 Conversation. In the Case for a new Clean Air Plan, the anticipated timeline for Clean Air Funds to open was Summer 2023, following a public consultation on the new Clean Air Plan proposals in early 2023. However, due to the delay in receiving a response from Government, and a new request to benchmark proposals against a Charging Clean Air Zone (CAZ) option, the date for opening the CTF, as part of a new GM CAP proposal, is unknown.
- 6.3 A number of districts have permitted existing vehicle license holders to retain vehicles on those licenses, that go well beyond the age limit policies of those districts in order for those license holders to benefit from the opportunity to apply to the fund when it opens. This has resulted in aging fleets across GM, as owners postpone upgrading their vehicles with the expectation of funds opening. Until the fund is opened, the GM taxi fleet will likely continue to age.
- 6.4 During engagement with the trade in September 2022 they also highlighted that some are now running old vehicles with disappointment expressed that funding was not likely to open until Summer 2023. Note that unless the CTF is opened early ahead of Government feedback on the GM CAP, the timeline for funds opening is likely to be further delayed.
- 6.5 A key assumption is that early opening of the fund is only viable if done without the need for a further consultation on the CTF, it is recommended that using the evidence gathered through the participatory policy development that highlighted the importance of inflationary impacts being taken into account, GM drafts a proposal to ask government to open the previously awarded CTF allocation using the eligibility criteria as set out in the 2021 GM Clean Air Plan Policy, in advance of agreeing the final scope of the GM CAP and a delegation is made to the Chief Executive, GMCA and TfGM, in consultation with the Chair to approve the submission of a proposal to the Government’s Joint Air Quality Unit.

- 6.6 ZEB Bus – In the report, attached as Appendix 3, which outlines Greater Manchester’s approach to address persistent exceedances of nitrogen dioxide identified on the A58 Bolton Road, Bury. It is stated that “In April 2022, Greater Manchester was awarded its City Region Sustainable Transport Settlement (CRSTS) and an allocation of £115m from that award has been made to towards Zero Emission Buses with the aim that a third of the bus fleet in Greater Manchester will be zero emission by 2027. These funds will be used to fund the incremental costs of updating buses to zero emission over above the cost of new diesels.”
- 6.7 Submitting a proposal for offsetting some of the £115m of CRSTS with other funding would offer both clean air and Bee Network benefits against challenging transport budget conditions and it is recommended that a delegation is made to the Chief Executive, GMCA and TfGM, in consultation with the Chair to approve the submission of a proposal to the Government’s Joint Air Quality Unit.

## 7 Clean Air Funds

- 7.1 As has been reported previously the emissions reduction for an HGV or bus changing from a non-compliant vehicle to a Euro VI model is greater than for lighter vehicles such as taxis and vans, therefore, the air quality benefits to GM per successful fund application are maximised. Funding for HGV and bus replacement and retrofit for eligible people and businesses remain open.
- 7.2 The Air Quality Administration Committee approved the establishment and distribution of the bus retrofit, bus replacement and HGV funds. Grants have been made using the scheme eligibility criteria as set out in the current GM Clean Air Plan Policy<sup>6</sup> to impacted vehicle owners. Grants have also been made to a very small number of Hackney, PHV, LGV and Motorhome vehicle owners who had already placed orders pending funding opening at the end of January to ensure they are not detrimentally impacted by the decision to pause the opening of the funds, this is referred to as the Early Financial Support Scheme. To end of January 2023 the following awards have been made:

<b>Purpose</b>	<b>Value of Total Grant</b>	<b>Value Committed<sup>7</sup></b>	<b>Value Paid out<sup>8</sup></b>	<b>Vehicles Upgraded</b>
Heavy Goods Vehicles	£8,000,000	£2,645,135	£899,135	132
Private Hire Vehicles	£10,744,811	£26,500	£20,000	6
Coaches	£4,448,000	£0	£0	0

<sup>6</sup> [GM Clean Air Plan Policy following Consultation](#)

<sup>7</sup> Value Committed is the value of the total number of applicants who have applied and have been awarded a grant

<sup>8</sup> Value Paid out is the value of the total number of grants paid out once a non-compliant vehicle has been traded in for a compliant vehicle and is on the road.

<b>Purpose</b>	<b>Value of Total Grant</b>	<b>Value Committed<sup>7</sup></b>	<b>Value Paid out<sup>8</sup></b>	<b>Vehicles Upgraded</b>
Minibus	£2,000,000	£5,000	£0	0
Light Goods Vehicles	£70,000,000	£72,500	£54,000	12
Hackney	£10,100,000	£115,000	£115,000	20
Bus Retrofit	£15,439,200	£15,121,528	£13,784,000	877
Bus Replacement	£3,248,000	£1,200,000	£1,104,000	69

7.3 The bus upgrades mean that 89% of the bus fleet serving Greater Manchester is now compliant with clean air standards.

7.4 Members requested the funding distribution to be broken down by LA. The table below sets out this information with the exception of buses as funding is available to all operators of registered bus service within GM.

	<b>Heavy Goods Vehicles</b>	<b>Private Hire Vehicles</b>	<b>Coaches</b>	<b>Minibus</b>	<b>Light Goods Vehicles</b>	<b>Hackney</b>
Bolton	54 (£359,000)	-	-	-	-	1 (£5,000)
Bury	20 (£140,000)	1 (£3,000)	-	-	1 (£4,500)	
Manchester	49 (£329,500)	-	-	-	1 (£4,500)	11 (£65,000)
Oldham	38 (£248,500)	3 (£11,500)	-	-	1 (£4,500)	1 (£5,000)
Rochdale	52 (£359,000)	-	-	-	1 (£4,500)	1 (£5,000)
Salford	39 (£291,083)	-	-	1 (£5,000)	2 (£9,000)	2 (£10,000)
Stockport	26 (£172,000)	-	-	-	5 (£23,000)	2 (£10,000)
Tameside	26 (£202,000)	-	-	-	-	-
Trafford	19 (£117,500)	3 (£12,000)	-	-	1 (£4,500)	-
Wigan	63 (£426,553)	-	-	-	4 (£18,000)	2 (£15,000)

## **8 Participatory approach to the development of a new plan**

8.1 GM leaders committed to a participatory approach to the development of the new Plan 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.

- 8.2 GM has undertaken targeted participatory activity with key stakeholders – vehicle-owning groups and representatives of other impacted individuals, such as community, business, environment and equality-based groups. This activity consisted of:
- Targeted engagement sessions – all groups
  - An online survey and supporting qualitative research activity – vehicle-owning groups only
- 8.3 The objectives of the approach are to:
- Raise awareness and gather feedback on the proposed new GM CAP.
  - 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).
  - Gather feedback on retaining funding principles from the previous Clean Air Plan.
  - Assess support for proposal to use ANPR cameras to identify vehicles frequently travelling on routes where there are persistent exceedances.
  - Explore perceptions and experiences of current vehicle market conditions, vehicle availability and costs of upgrading.
  - Understand what measures other than vehicle funding would help vehicle owners to upgrade.
  - Understand unintended impacts of the proposed plan on people with protected characteristics GM-wide and within local geographies to inform the Equalities Impact Assessment.
  - Understand any spatial considerations with particular emphasis on the locations where there are projected to be persistent exceedances in NO<sub>2</sub>.
- 8.4 The headlines from targeted engagement and research are set out at Appendix 4, the PPD Summary of Stakeholder Engagement Report is attached as Appendix 5, and the AECOM PPD Online Survey and In-depth Interview Report is attached as Appendix 6. Input from those engaged will inform the ongoing policy development process as GM develops a package of measures forming a proposed new GM CAP.

## **9 Electric Vehicle Charging**

- 9.1 As set out in the report GM Clean Air Plan Expenditure Update, the transition to low and zero emission vehicles is a key priority of Greater Manchester's Transport Strategy and ambition to become carbon neutral by 2038, as well as a key component of the GM Clean Air Plan.



- 9.2 JAQU have made 3 funding awards for the purpose increasing the number of publicly accessible of EV Charging Points and following feedback from the public consultation, Local Authorities approved the reallocation of funding from the Try Before You Buy scheme to the Taxi EV Charging scheme to provide additional electric vehicle charging points dedicated for use by taxis.
- 9.3 The delivery and operation of Greater Manchester’s publicly funded Electric Vehicle Charging Infrastructure is co-ordinated by Transport for Greater Manchester (TfGM), so that EV can integrate its delivery with wider strategic GM responsibilities such as sustainable journeys, carbon reduction and Clean Air.
- 9.4 Members requested an update as to progress to deliver EV charge points funded by the Clean Air Funding.
- 9.5 Early Measures – EV Awareness and Infrastructure – Update
- 9.6 Since the funding was awarded in March 2018 TfGM has delivered 22 out of the 24 rapid charging points. These are listed below:

<b>Site Name</b>	<b>Authority</b>	<b>Type of Site</b>	<b>Date of Installation</b>
Soho Street 1	Bolton	LA Car Park	11/03/2021
Soho Street 2	Bolton	LA Car Park	11/03/2021
Mill Gate Shopping Centre	Bury	Private Leisure Car Park	13/08/2021
The Rock Multi-storey Car Park	Bury	Private Retail Car Park	13/08/2021
Angel Street	Manchester	Onstreet	01/02/2021
Levenshulme Station	Manchester	Rail Station Car Park	02/02/2022
Liverpool Road	Manchester	On-Street	07/06/2021
MMU Birley Fields	Manchester	Private Car Park	21/07/2021
Oldham Civic Centre	Oldham	LA Car Park	21/08/2020
Housing Units	Oldham	Private Retail Car Park	21/07/2021
Heywood Civic Centre	Rochdale	LA Car Park	23/03/2021
Rochdale Leisure Centre	Rochdale	Leisure Car Park	30/04/2021
Crescent House Lay-by	Salford	On-Street	24/12/2021
Wellington Road	Salford	On-Street	22/10/2020
Massie Street	Stockport	LA Car Park	27/08/2020
New Bridge Lane	Stockport	LA Car Park	10/11/2020
Ashton Pools (Tameside Sports Trust)	Tameside	Leisure Car Park	01/02/2021
Darnton Road (Tameside)	Tameside	LA Car Park	31/03/2021
Trafford General Hospital	Trafford	Private Car Park	22/07/2021
Harrogate Street	Wigan	LA Car Park	03/09/2020
Loire Drive – Wigan	Wigan	LA Car Park	06/10/2020

- 9.7 Additionally, through the Early Measures project TfGM have delivered 18 promotional events for business and the general public, an Electric Travel website Home Page | TfGM Electric Travel. TfGM have also directly engaged with over 50 businesses and Local Authorities in the Greater Manchester area around various

Electric Vehicle opportunities, including fleet and providing charging points to improve their commitment to electric vehicles.

- 9.8 Until December 2021 TfGM had been progressing the delivery of a further three charging points at the Trafford Centre, but unfortunately due to a change of ownership of the centre, this no longer aligned with their EV strategy and they withdrew their sites from the programme. Working with the Local Authorities the team have determined 2 replacement charging points in order to meet the requirement of 24 charging points, as stated in the funding letter. It has been agreed with JAQU to replace two legacy Siemens charging points at the Etihad Stadium and Stott Lane Car Park (Salford Royal) to bring them in line with the latest Government customer standards, to include contactless payment methods. Additionally, it is intended to deliver the remaining charging point purchased for use at the Trafford Centre. Three potential locations have been identified to progress to feasibility through an options assessment process, taking into account geographical gaps in EV charging infrastructure across GM, affordability (following receipt of ENWL cost estimates) and deliverability. The three sites are all in Stockport; and the site will be selected following completion of the feasibility studies.
- 9.9 Dedicated Taxi Electric Vehicle Charging Infrastructure Update – The Taxi EV project will see 60 rapid charging points across Greater Manchester dedicated for EV private hire (PHV) and hackney vehicles licensed by a Greater Manchester Authority. They will become part of the Be.EV charging network.
- 9.10 GM secured £1.8m of Office of Zero Emission Vehicles (OZEV) funding with a GMCA contribution of £0.6m to facilitate the rollout of no less than 30 dedicated rapid Taxi charging points in locations that will be highly favourable to both the Hackney and Private Hire trades.
- 9.11 The GM Clean Air Plan (GM CAP) also has £3.5m of funding for a further 30 dedicated rapid Taxi charging points.
- 9.12 Given the similarities in scope between the OZEV Taxi EV project and the CAP Taxi EV project they have been combined for delivery, and the charging points will be delivered using a phased approach in order to best utilise TfGM, Local Authority and ENWL resources.
- 9.13 The table below provides an overview of the site selection process to highlight that choosing Taxi EV sites has been a complex and lengthy process and there are many factors that have been considered.

<b>Activity</b>
<b>Site Selection – Long listing</b> A long list of possible Taxi EV sites on LA or TfGM owned land across GM was developed with LA colleagues. LA or TfGM owned land was selected to avoid lengthy legal agreements and increased costs associated with privately owned sites.

ENWL was engaged to understand power feasibility at all sites and helped to determine the long list i.e. there was enough power at sites for the proposed charging points.
<p><b>Trade Engagement on long list</b></p> <p>The long list of sites were used as part of an online interactive engagement (in light of COVID19) exercise to consult the Taxi Industry on site selection – this was promoted via License Managers for a total length of 8 weeks in order to gain their insight as to which sites they felt were most appropriate.</p>
<p><b>Site Selection - shortlisting</b></p> <p>Trade feedback was collated to determine the 30 preferred sites across GM (each of the 10 districts has 3 sites each.) LA’s were engaged throughout this process to ensure that the top sites were acceptable and approved internally taking into account any internal governance processes that were required.</p> <p>The Taxi License Managers, Highways and Car Parking teams were engaged and site visits arranged to visit sites and understand feasibility / constraints.</p>
<p><b>Feasibility Studies &amp; Detailed Design</b></p> <p>Feasibility reports were produced for all Taxi EV sites</p> <p>Detailed designs produced for Taxi EV sites</p>
<p><b>Planning permission, Host Agreements and TROs</b></p> <p>7 Planning applications approved(1 still to submit)</p> <p>Host Agreements in progress or completed</p> <p>TROs in progress or completed for 8 LAs (2 LAs have District-wide TROs in place)</p>
<p><b>Installation</b></p> <p>30 Taxi EV sites to be delivered across GM (3 in each district) in line with the Mayoral commitment.</p> <p>The installation works commenced in early 2023 and will be completed by summer 2023.</p>

9.14 The 30 sites chosen are listed below each site will have 2 charging units:

<b>Site Name</b>	<b>Authority</b>
Eagle Street car park	Bolton
Egerton Street car park	Bolton
Back Willows Lane car park	Bolton
Foundry Street car park	Bury
Trinity Street car park	Bury
Whitefield Metrolink Park and Ride car park	Bury
China Town car park	Manchester
Thurloe Street car park	Manchester
Harling Road (on street) Sharston Industrial Area	Manchester
Peel Street car park	Oldham
Waterloo Street car park	Oldham
2x sites are currently under consideration	Oldham
High Street car park	Rochdale
Eastview car park	Rochdale
Taylor Street car park	Rochdale
Hankinson Way car park	Salford
Church Street car park	Salford
St John Williams Street car park	Salford
Lomas Street car park	Stockport

<b>Site Name</b>	<b>Authority</b>
Newbridge Lane car park	Stockport
Torkington Street car park	Stockport
Beeley Street car park	Tameside
Mulberry Street car park	Tameside
Union Street car park	Tameside
Ashfield Road (on street)	Trafford
The Quadrant car park	Trafford
Victoria Place	Trafford
Chatsworth Street Pemberton car park	Wigan
Loire Drive car park	Wigan
Town Hall car park (Leigh)	Wigan

## **10 Recommendations**

10.1 The recommendations are set out at the front of the report.

## **11 Appendix One – Minister Pow Letter**

11.1 Attached as a supplementary paper.

## **12 Appendix Two – GM Response Letter**

12.1 Attached as a supplementary paper.

## **13 Appendix Three – A58 Report**

13.1 Attached as a supplementary paper.

## **14 Appendix Four – Headlines from targeted engagement and research**

14.1 Stakeholder groups were taken through Greater Manchester's current position regarding GM CAP and asked a series of agreed questions. They were given a recap on why a new Greater Manchester Clean Air Plan is needed and what is currently under review (subject to government feedback).

14.2 Vehicle groups were presented with the Clean Air funding levels offered in the previous plan, as well as the funding principles – noting that some elements of the '2021' Policy are relevant for the investment-led approach.

14.3 Stakeholders were asked for their view on the new CAP, the use of ANPR. Vehicle groups were asked about their interest in taking up funding, retaining the funding principles from the previous clean air plan, and any other measures they wanted to share to help clean up their fleet.

14.4 The headline findings from the engagement sessions are as follows:

14.5 GM Hackney & Private Hire Vehicle Trade

- CAP funding amount from previous plan not sufficient to encourage to upgrade.
- PHV welcomed tackling out-of-area vehicles but if measures are taken to address out-of-area vehicles – this would require a significant transition period so as not to affect availability of drivers.
- Reported problems in the market for CAP-compliant vehicles, the second-hand market is limited.
- The trade-in value of Euro 5 vehicles is low. Many cannot afford to upgrade, the trade has suffered financially since the pandemic, including impact on credit.
- EV charging infrastructure: it would not be beneficial to use funds to install more charge points – operating EV was said to be impractical and expensive. Still cheaper to buy compliant Euro 4/6.
- Concerns that capping funds to 5 vehicles would damage the effort to upgrade as well as limit larger operators in upgrading vehicles.
- Only one testing house (CVRAS) is approved for retrofit – this is limiting and less affordable. There are a limited number of dealerships to upgrade vehicles.
- The requirement to use accredited dealerships to upgrade vehicles.

14.6 Confederation of Passenger Transport:

- Operators based outside of GM should be eligible for CAP funding if they can evidence they are regularly operating in GM.
- Thought that £16k to cover the cost of retrofit or £32k for upgrade was a generous offer.
- Offer grants to upgrade the oldest Euro III to Euro V vehicles, which would reduce supply issues and there would still be an air quality benefit, though not as good as Euro VI.

14.7 Road Haulage Association:

- 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.
- suggested that the funding should be used for purchasing compliant vehicles and not retrofitting as the lifespan is short for retrofitted vehicles.
- 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.

#### 14.8 Community Transport Association (Minibus):

- 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.
- Greater Manchester 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. Supportive of the plan.

#### 14.9 Institute of Couriers:

- 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.
- An investment-led non-charging Clean Air Plan could result in the industry regarding Manchester as a place where courier businesses can send older vans as there would be no clean air regulations and it wouldn't be seen as the place to send any investment in electric vans.

#### 14.10 OneBus:

- 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, Greater Manchester should be doing this as soon as possible.

#### 14.11 Licensed Private Hire Association:

- 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, if GM wants those vehicles to be compliant.
- Funding should help individuals to upgrade, not large fleet operators, given that the pandemic has had a huge financial impact.

#### 14.12 Equalities-based, Health, Voluntary, Community & Social Enterprise sector:

- Would like to see funding extended to include minibuses as many community groups rely on these. (GM Older People's Panel)
- 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. (10GM and others)
- More publicity and communications needed to show how dangerous NO<sub>2</sub> is on public health, specific examples were made to asthma sufferers unable to get out and about and fatal asthma attacks. (DDRG, DPH and others)

- Concern that there was not sufficient engagement undertaken with health professionals and those with health issues before the new plan was developed. (Asthma & Lung UK)
- 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. (Asthma & Lung UK)
- 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. (Asthma & Lung UK)
- Public transport accessibility should be improved and made cheaper to discourage car use. (Asthma & Lung UK and others)
- There needs to be greater emphasis on reducing levels of particulate matter (PM) as related health impacts are worse than thought. (Asthma & Lung UK)
- Reducing bus fares would encourage more use of public transport to help address the problem (CAHN and others)

#### 14.13 Friends of the Earth:

- Private cars form a large part of the road-mix, were keen to understand why are cars not included in the plan. Attendees stated would be easier to switch out for sustainable journeys than commercial vehicles, e.g. a plumber can't get rid of his van.
- The promotion of the GM CAP will be key – there needs to be more emphasis on why a Clean Air Plan is needed. Members of the public last time believed that private cars were included.
- Friends of the Earth supported the approach but, like with the previous Plan, believe it is not enough and will press Manchester City Council for a Ultra Low Emission Zone.

#### 14.14 GM Chamber & FSB:

- The financial impacts of the pandemic are still being felt – many are struggling to access finance.
- Business are facing rising costs – in fuel, materials, staff.
- The investment-led approach was said to be more business friendly.
- Reported that the financial impacts of the pandemic are still being felt. Regarding grant levels, inflation must be taken into account – however businesses experience much higher price rises than the BoE rate suggests.
- Agree that targeting funds to those based outside of Greater Manchester if they are regularly using routes of exceedances.

- Communication of the investment-led plan will be key to ensuring it achieves what it set out to do.

#### 14.15 Neighbouring Local Authorities:

- Broadly supportive of the investment-led non-charging approach.
- Interest in what is happening with signage and infrastructure.
- Keen interest across the board and support of the potential for funds to open up to businesses based outside of GM, but regularly travelling within GM boundaries.

#### 14.16 The following points summarise the feedback that was obtained from all groups engaged regarding the use of ANPR cameras to identify vehicles who would be eligible for funding:

- PHV: ANPR cameras – good to use them to identify those who can apply for funding.
- Coach: Regarding use of ANPR cameras to target funding – some concerns around the use of data and how it might be used.
- RHA: Use of ANPR cameras was a sensible strategy, and that they felt this would help reduce air pollution, the cameras are an integral part that will help identify these non-compliant vehicles across GM.
- OneBus: The use of ANPR cameras to target investment, in principle, sounded sensible.
- Older People's Panel: ANPR cameras have been a large investment and should be shut down if not near an area of exceedance due to being in the way.
- Neighbouring LAs: GM should target the funding accordingly to meet exceedance need through use of ANPR cameras

#### 14.17 Two surveys for vehicle-owning groups were developed, one for the Hackney and Private Hire Vehicle trade and the HGV/Coach trade. The surveys ran from Monday 5th September – Monday 10th October. 900 responses were received for Taxi and 233 responses for coach/HGV. The survey headlines are:

#### 14.18 Hackney & PHV

- 82% said if funding was available to retrofit or replacement under a non-charging plan they would apply.
- For PHV, 74% said if funding was available to retrofit or replacement under a non-charging plan they would apply.
- Around 50% of both Hackney and PHV reported that they were making fewer bookings each day compared to before the pandemic.



#### 14.19 HGV

- 45% of HGV respondents had taken up the funding or applied for the funding.
- 62% of HGV respondents stated they strongly agreed that they were having issues with vehicle affordability.
- 70% of HGV respondents had at least 1 non-compliant vehicle running in GM.
- 54% of HGV respondents had more than 5 vehicles.
- 19% were not aware Clean Air Funds for HGVs existed.

#### 14.20 Coach:

- 33% of coach respondents said that the price they had in mind for a new vehicle was £100-£225K.
- 57% of coach respondents said that market conditions has affected their process of upgrading to a cleaner vehicle.
- 90% would apply if funding was available to retrofit or replacement under a non-charging plan.

14.21 28 depth interviews took place between 26th September and 10th October. In total there were 28 interviews: 8 HGV vehicle owners, 4 coach owners and 16 taxi/PHV owners. The Research sought to understand vehicle journeys in GM, vehicle purchasing behaviours inc. Challenges. It asked about attitudes to EV, awareness of the CAP fund and feedback on upgrading vehicles under an investment-led non-charging plan. The interview headlines are:

#### 14.22 Coach

- Reported experience of covid recovery, rising fuel costs and unstable work. It was felt that it would be a risk to invest and upgrade.
- Most looking at second-hand market as prices are considerably lower.
- One interviewee stated that the non-charging plan was the difference between the business surviving or not.

#### 14.23 Hackney/PHV

- Generally, the message from both hackney and PHV was that if they're going to upgrade and funding was available then they would use it, but not earlier than planned, particularly around uncertainty with CAP and vehicle market.

#### 14.24 HGV

- Reported long waiting lists, of up to 1.5 years for a compliant vehicle.

- Funds – Those who were going to upgrade anyway would see it as a bonus, but if there were no plans to upgrade relatively soon, then they expected uptake would be low.

## **15 Appendix Five – PPD Summary of Stakeholder Engagement Report**

15.1 Attached as a supplementary paper.

## **16 Appendix Six – AECOM PPD Online Survey and In-depth Interview Report**

16.1 Attached as a supplementary paper.