

Classification	Item No.
Open / Closed	

Meeting:	Licensing and Safety Committee
Meeting date:	22 February 2024 - Licensing and Safety Committee 20 March 2024 - Full Council
Title of report:	Review of emissions standard transitional implementation date for existing Hackney Carriage and Private Hire vehicles to compliant vehicle in respect of proposed GM Clean Air Plan.
Report by:	Executive Director (Operations)
Decision Type:	Council
Ward(s) to which report relates	All

Executive Summary

This report outlines the proposal to bring forward the implementation of existing standards related to emissions from 1 April 2026 to 1 January 2026 for licensed vehicles eligible for current transitional arrangements. The rationale for this relates to the recent submissions to Government with revised proposals around the GM Clean Air Plan and requirement from Government to ensure a GM agreed emissions standard for all Taxi and Private Hire vehicles by 31 December 2025.

Recommended Option

It is recommended that the Licensing and Safety Committee considers and adopts the following amendment (1) to the existing emission standard and recommends to Full Council that amendment (1) be approved:

For existing vehicle licence proprietors:

1. That the transitional arrangements amended by Full Council on 22 March 2023, in relation to age and emissions, previously extended from 1 April 2024 to 1 April 2026, are amended again and to be in effect from 1 January 2026. This will enable hackney carriage and private hire vehicle owners to meet the agreed GM emissions standard outlined in the revised GM Clean Air Plan submissions. The amended policy will state that from 31 December 2024 a vehicle licence will not be renewed if the vehicle does not meet the current emission standard.

Key considerations

This is a Council Function that is delegated to the Licensing and Safety Committee by the Council's Constitution.

This paper is in the public domain.

Community impact / Contribution to the Bury 2030 Strategy

The changes put forward in this report will facilitate more rapid improvement with clean air through facilitating the replacement of non-compliant (emission) vehicles for both hackney carriage and private hire/private hire vehicles. This could potentially help reduce the time it takes for these vehicles to be upgraded and become compliant with existing emissions standard leading to less carbon emissions and less tailpipe emissions. It will also enable access to the linked funding related to the revised GM Clean Air Plan submissions to Government which will assist with vehicle upgrade costs.

Equality Impact and considerations:

Under section 149 of the Equality Act 2010, the 'general duty' on public authorities is set out as follows:

A public authority must, in the exercise of its functions, have due regard to the need to -

- (a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;*
- (b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;*
- (c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.*

The public sector equality duty requires us to consider how we can positively contribute to the advancement of equality and good relations and demonstrate that we are paying 'due regard' in our decision making in the design of policies and in the delivery of services.

The Licensing Service have considered the Equality Act 2010 and due to each application being dealt with on its own merits there is no positive or negative on any of the protected characteristics.

An Equality Impact Assessment (EIA) was undertaken when the existing standards were implemented through a full governance process. This report seeks to bring forward the implementation date for emissions compliance by 3 months to enable access to the GM Clean Taxi Fund support package when it is made available which will provide financial assistance to affected vehicle proprietors. Conversely, if no change is made to the existing transitional arrangements this could be detrimental and financially disadvantage affected vehicle proprietors.

Assessment of Risk:

The following risks apply to the decision:

Risk / opportunity	Mitigation
<p>Opportunity: The adoption of the recommended amendments to existing transitional arrangements will enable the hackney carriage and private hire trade in Bury access any future GM funding linked to the revised submissions to Government regarding the GM Clean Air Plan.</p> <p>Risk: Maintaining existing transitional arrangements may jeopardise the revised submissions to Government regarding the GM Clean Air Plan and may prevent the hackney carriage and private hire trade in Bury accessing any future GM funding.</p>	None

Consultation:

Not applicable

Legal Implications:

Under the legislation the Council is required to determine representations. The report is in accordance with the appropriate legislation.

The costs of the licensing function are funded through the fees and charges levied by the Council. There may be additional costs if appeals are lodged with the Magistrates and Crown Courts.

Members are advised that Licences are regarded as possessions within the terms of the Human Rights Act 1998. Under the Act everyone is entitled to the peaceful enjoyment of one's possessions and so actions interfering with those possessions must be lawful, reasonable and proportionate. It is lawful to impose reasonable conditions as a way of protecting the safety of the travelling public, so long as it is not out of proportion. It is a balancing act between the public interest and the individual's rights.

The policy changes recommended, if agreed by the Council, will be implemented and form the basis on which decisions are made on applications for vehicle licences received by the Council.

Financial Implications:

Revenue and Capital: The Licensing Regime is a self-funded service through the licensing fees. There are no financial implications as a result of this report as the changes do not have any cost implications to the Council.

Report Author and Contact Details:

Mr M Bridge
Licensing Office
3 Knowsley Place
Duke Street
Bury
Telephone No: 0161 253 5209
Email: m.bridge@bury.gov.uk

Background papers:

Licensing and Safety Committee report and minutes – 16 March 2023

Please include a glossary of terms, abbreviations and acronyms used in this report.

Term	Meaning
CAZ	Clean Air Zone
CTF	Clean Taxi Fund
EIA	Equality Impact Assessment
GM	Greater Manchester
GM CAP	Greater Manchester Clean Air Plan
GMCA	Greater Manchester Combined Authority
HCV	Hackney Carriage
ICE	Internal Combustion Engine
JAQU	Joint Air Quality Unit
NO ₂	Nitrogen Dioxide
PHV	Private Hire Vehicle
SoS	Secretary of State
TFGM	Transport for Greater Manchester
WAV	Wheelchair Accessible Vehicle
ZEB	Zero Emission Bus

1.0 Background

- 1.1 Members will recall that this matter was considered at the previous Licensing and Safety Committee meeting on the 1 February 2024. Members resolved to defer consideration of this matter until tonight's meeting.
- 1.2 The Government has instructed many local authorities across the UK to take quick action to reduce harmful roadside levels of Nitrogen Dioxide (NO₂) with the Secretary of State (SoS) for Environment, Food and Rural Affairs issuing Directions 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 Greater Manchester Clean Air Plan (GM CAP).
- 1.3 The GMCA – Clean Air Final Plan report on 25 June 2021¹ endorsed Greater Manchester's Final CAP and policy following a review of all of the information gathered through the GM CAP consultation and wider data, evidence and modelling work. Throughout the development of the previous Plan, JAQU reviewed and approved all technical and delivery submissions. The Plan was agreed by the ten Greater Manchester local authorities. Within this document, this is referred to as the Previous GM CAP.
- 1.4 On the 8 February 2022, a new direction (the Direction) was issued by the SoS² which confirmed that the March 2020 Direction to implement a Class C charging Clean Air Zone (CAZ) had been revoked and required that a new plan be submitted to the SoS by 1st July 2022 the GM authorities should:
- review the measures specified in the local plan for NO₂ compliance and associated mitigation measures; and
 - determine whether to propose any changes to the detailed design of those measures, or any additional measures.
- 1.5 The Direction also states that the local plan for NO₂ compliance, with any proposed changes, must ensure the achievement of NO₂ compliance in the shortest possible time and by 2026 at the latest. It should also ensure that human exposure to concentrations of NO₂ above the legal limit is reduced as quickly as possible.
- 1.6 In July 2022, the 'Case for a new Greater Manchester Clean Air Plan'³ was submitted to the Secretary of State. It 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 [GMCA 210621 Report Clean Air Plan - FINAL FINAL.pdf \(greatermanchester-ca.gov.uk\)](https://assets.ctfassets.net/tlpgbv1k6h2/7jtkDc5AODypDQlw0cYwsl/67091a85f26e7c503a19ec7aeb2e8137/Appendix_1_-_Case_for_a_new_Greater_Manchester_Clean_Air_Plan.pdf)

² [The Environment Act 1995 \(Greater Manchester\) Air Quality Direction 2022 \(publishing.service.gov.uk\)](https://publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/103421/The_Environment_Act_1995_(Greater_Manchester)_Air_Quality_Direction_2022.pdf)

³

https://assets.ctfassets.net/tlpgbv1k6h2/7jtkDc5AODypDQlw0cYwsl/67091a85f26e7c503a19ec7aeb2e8137/Appendix_1_-_Case_for_a_new_Greater_Manchester_Clean_Air_Plan.pdf

- 1.7 The primary focus of the 'Case for a new Greater Manchester Clean Air Plan' was to identify a plan to achieve compliance with the legal limit value for NO₂ in a way that considered the 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 with the aim of reducing NO₂ emissions to within legal limits, in the shortest possible time, and at the latest by 2026.
- 1.8 The 'Case for a new Greater Manchester Clean Air Plan' proposed using the £123m of Clean Air funding that the Government has awarded to the GM authorities to deliver an investment-led approach to invest in vehicle upgrades, rather than imposing daily charges, and deliver new Zero Emission Buses (ZEBs) as part of the Bee Network (a London-style integrated transport network for Greater Manchester). The new plan would ensure that the reduction of harmful emissions would be at the centre of GM's wider objectives. Within this document, this plan is referred to as the 'New GM CAP'.
- 1.9 Having submitted the Case for a New Clean Air Plan in July 2022 GM was asked by Government in January 2023 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.*
- 1.10 Greater Manchester Authorities have been undertaking the work required to supply this further evidence and on 8 March 2023 submitted the first element,⁴ 'Approach to Address Persistent Exceedances Identified on the A58 Bolton Road, Bury'⁴.
- 1.11 In April 2023, Government advised TfGM that it was to pause any new spending on bus retrofit as it had evidence that retrofitted buses have poor and highly variable performance in real-world conditions.
- 1.12 In the light of the Government's new evidence, JAQU issued revised general guidance to authorities producing Clean Air Plans nationwide requiring that air quality modelling should no longer assume any air quality benefits from a retrofitted bus. The Government also advised that it anticipated a six-month focused research programme to quickly investigate the causes of poor bus retrofit performance and how it could be improved would be reported in Autumn 2023.

⁴ <https://democracy.greatermanchester-ca.gov.uk/documents/s24939/Appendix%203.%20GM%20CAP%20A58%20Bury%20Measure%20Report%20DRAFT%20for%20AQAC%20Approval%20Feb%2023.pdf>

- 1.13 To date the outputs of this study have not been made available to GM and in the absence of the government's bus retrofit study and GM has incorporated the revised guidance from JAQU, requiring that air quality modelling should no longer assume any air quality benefits from a retrofitted bus into the modelling which underpins the development of its Clean Air Plan to produce an report that appraises the ability of the Investment-led Plan and a benchmark CAZ to deliver compliance with the legal limit value in the shortest possible time and by no later than 2026.

Information

- 1.14 The report "GM Clean Air the GM Air Quality Administration Committee on 20 December 2023. The report was agreed by the Committee provides an update on the Case for a new Greater Manchester Clean Air Plan and confirms that an appraisal of GM's proposed investment-led plan has been undertaken against a benchmark charging Clean Air Zone (CAZ) in the centre of Manchester and Salford.
- 1.15 Using the government's updated technical guidance, that 'no air quality benefit' should be assumed from bus retrofit, GM now has evidence to show that its investment-led, non-charging Clean Air Plan can deliver compliance with the government direction to bring nitrogen dioxide levels within legal limits in 2025.
- 1.16 Modelling predicts if GM did nothing there would be twelve exceedances of nitrogen dioxide in 2025. The majority of these would be in the regional centre – Manchester and Salford.
- 1.17 GM's investment-led plan proposes using £86.7 Clean Air funding already awarded, for investment in zero-emission buses, taxi and private hire vehicle upgrades (through a Clean Taxi Fund) and measures to manage traffic flows on some roads in the centre of Manchester and Salford.
- 1.18 Modelling shows GM's investment-led plan can achieve compliance in 2025 and that compliance is not achieved in 2025 or 2026 by a benchmarked category C charging CAZ.
- 1.19 The GM's evidence shows that the investment-led, non-charging plan can achieve compliance in 2025. However, it is for government to determine what measures GM is to implement – only the Investment-led Plan complies with the requirement placed on the 10 GM local authorities to deliver compliance in the shortest possible time and by 2026 at the latest.

Taxi and Private Hire Vehicle (PHV) Measures

- 1.20 Taxi and PHV measures represent an important mechanism for reducing exceedances under the Investment-led Plan and are grounded in the ability of the GM authorities to reduce emissions through licensing conditions.
- 1.21 The appraisal of the Investment-led Plan has been developed on the basis that an emissions standard, requiring licensed hackneys and PHVs to be a minimum of Euro 6 (diesel) or Euro 4 (petrol) by 31 December 2025, will have been adopted by all GM Authorities.

- 1.22 This means that licences issued by Bury will have to have a compliant vehicle attached to the licence by 31 December 2025 at the latest. Licensees can apply at any time during the currency of their licence to replace the vehicle attached to that licence, and therefore must ensure that they have sourced and purchased an emissions compliant vehicle in good time to ensure they have a compliant vehicle licensed by 31 December 2025. Officers will advise the trade further with regards to application deadlines to ensure sufficient time for processing and vehicle testing prior to the licence being issued.
- 1.23 The Council's current licensed vehicle emissions policy is a petrol vehicle must be Euro 4 and a diesel vehicle must be a Euro 6.
- 1.24 In the investment led plan, it is therefore assumed that by 2026 100% of the GM taxi fleet will be compliant with the emission standards with all GM Authorities working to achieve this. It is intended that the Clean Taxi Fund will support this providing sufficient funds for every current non-emission compliant vehicle licensed to a GM authority to receive grant support (if applicable). Further the is to be opened Fund before 2025 enabling earlier upgrades, and helping to mitigate against the risk of taxis re-licensing with another authority that does not have the same emission standard requirement.
- 1.25 A Clean Taxi Fund (CTF) of £30.5m is proposed to offer funding to support upgrades of taxis to cleaner vehicles through two routes. These are:
- Core Taxi Fund of £22.5m – based on the 2021 GM CAP Policy, the funding is eligible to non-compliant, GM-licensed hackneys and PHVs. The financial support has been uplifted with inflation, with an associated air quality benefit derived from minimum emission standards across the 10 GM Authorities.
 - Electric Hackney Upgrade Fund of £7.9m – based on the Bradford scheme⁵ and feedback received during GM's Participatory Policy Development⁶, the funding is available to compliant Internal Combustion Engine (ICE) hackneys and seeks to support upgrades to the cleanest vehicle type whilst taking into account feedback.
- 1.26 The Air Quality Administration Committee recommended that each GM Authority puts appropriate arrangements in place to facilitate a transitional start date for the implementation of emission standards by the 1 January 2025 with the end transition date being the 31 December 2025. Ultimately it is for the government to determine what measures GM is to implement, the appraisal shows that only the Investment-led Plan complies with the requirement placed on the 10 GM Authorities to deliver compliance in the shortest possible time and by 2026 at the latest.
- 1.27 The report has been submitted to the Secretary of State for Environment, Food and Rural Affairs setting out that whilst we await their response the GM Authorities will, on the anticipation of the Clean Taxi Fund being agreed, make preparations to ensure a minimum taxi emissions standard will have been adopted by all GM Authorities.

2.0 Bury Council's position

- 2.1 The transitional arrangements were initially agreed by Full Council on 24 November 2021 with subsequent amendments to the implementation date for transitional arrangements on 22 March 2023, in relation to age and emissions standards extending from 1 April 2024 to

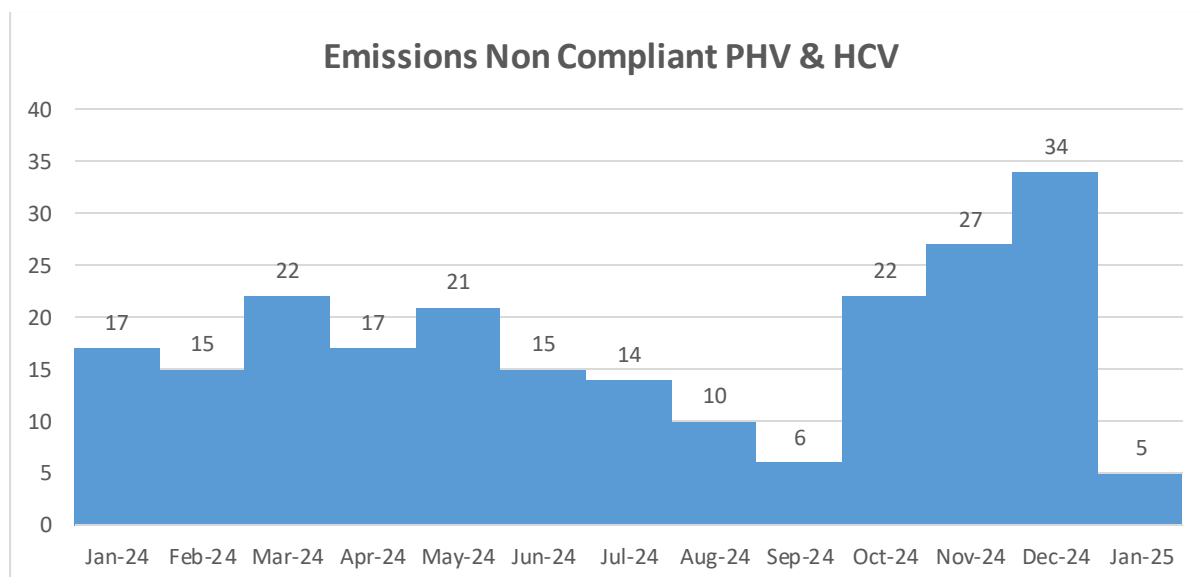
⁵ Bradford Council, who operate a Category C charging Clean Air Zone, have launched an additional fund to support Bradford-licensed Hackneys to upgrade to fully electric. The fund is open to owners of Bradford which are already classed as compliant with minimum emissions standards.

⁶ [Participatory Policy Development - Summary of Stakeholder Engagement Report](#) Page 14, point 8

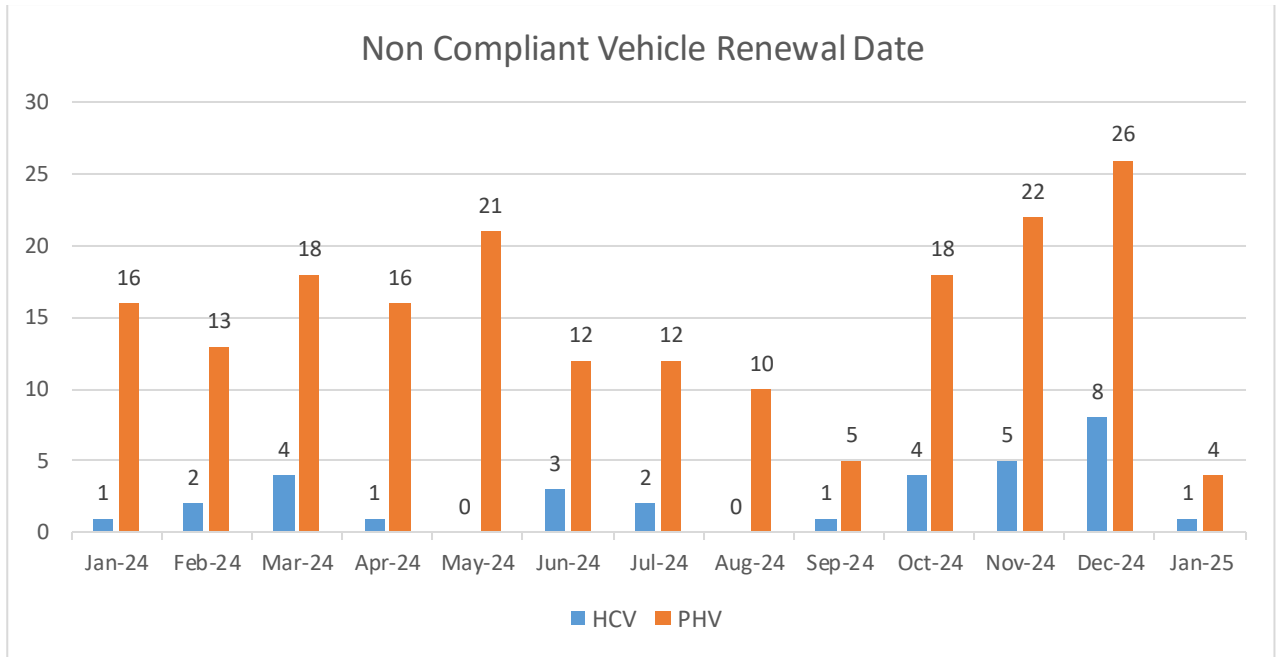
1 April 2026. This report seeks approval to amend by bringing forward the implementation date by three months to 1 January 2026. The justification for this amendment is to enable hackney carriage and private hire vehicle owners to meet the agreed GM emissions standard outlined in the revised GM Clean Air Plan submission to Government which will provide access to the Clean Taxi Fund to assist vehicle proprietors to upgrade their existing vehicle to an emissions compliant vehicle. The proposed amended policy will state that from 31 December 2024 a vehicle licence will not be renewed if the vehicle does not meet the current emission standard to ensure that on the 1 January 2026 all licensed vehicles in Bury will comply with the GM emissions standard.

2.2 The Licensing Service have reviewed the fleet data on the 11 January 2024 and have identified following the assessment of all 760 licensed vehicles we currently have 225 (29.6%) non complaint vehicles which consist of 193 (25.4%) Private hire vehicle and 32 (4.2%) Hackney Carriages.

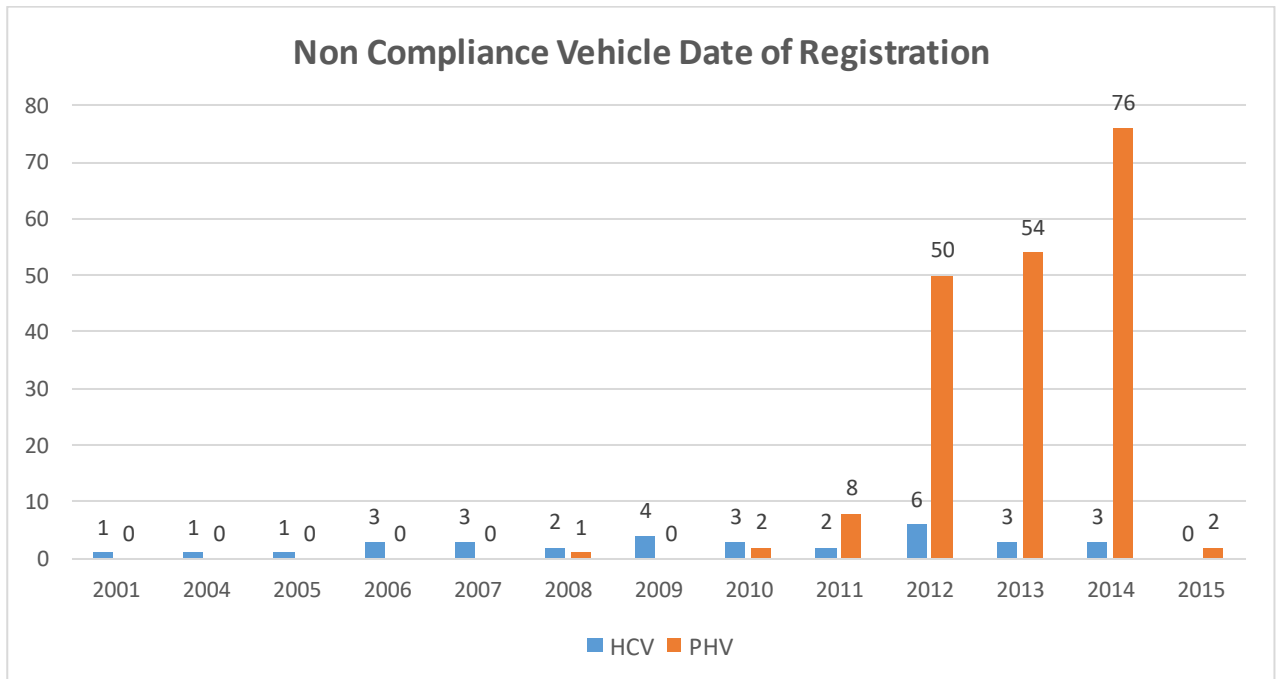
2.3 **Table 1** shows the numbers of vehicles that are not compliant between the period of January 2024 until January 2025.



2.4 **Table 2** shows the numbers of vehicles that are not compliant by renewal date between the period of January 2024 until January 2025.



2.5 **Table 3** shows the numbers of vehicles that are not compliant by date of vehicle registration.



2.6 Following the request from Members of the Licensing and Safety Committee on 1 February 2024, the Licensing Service undertook an engagement exercise which included contacting the 225 affected vehicle proprietors who are currently in receipt of transitional arrangements. An initial email was sent on 6 February 2024 and reminder email was sent on 12 February 2024 asking for responses to the two questions requested by members of

the committee;
1. *What are your views on moving the implementation date from 1 April 2026 to 1 January 2026*
2. *What are your views on your ability to meet this proposed amendment?*

- 2.7 The engagement exercise sought views on the proposals to bring forward the transitional arrangements in respect of the existing emissions standard by three months (1 April 2026 to 1 January 2026). In addition to the email correspondence, the Councils Licensing Engagement Officer contacted a range of vehicle proprietors affected to gain their views.
- 2.8 The proposed amendment will be discussed at the at the Trade Liaison meeting scheduled to take place on the 15 February 2024.
- 2.9 The results of the engagement exercise will be forwarded to the Members of the Licensing and Safety Committee once collated and reviewed. The collation of the data will take place after the Trade Liaison meeting on 15 February 2024.
- 2.10 The responses will be annexed to this report prior to the Licensing & Safety Committee meeting on 22 February 2024 at Appendix 1.

3.0 Conclusion & Recommendation

- 3.1 This report seeks to amend the existing transitional arrangements which are due to end on 1 April 2026 by bringing forward three months with a proposed implementation date of 1 January 2026. This amendment affects the implementation date of the existing emission standard which was agreed and adopted by the Council, and has been in place for all new to fleet vehicles, since 24 November 2021.
- 3.2 If the transitional date is not amended as outlined above, the Councils transitional arrangements policy will not be aligned with the submissions to Central Government by TfGM for the revised GM CAP which proposes that by 1 January 2026 100% of the GM taxi fleet will be compliant with the emission standards with all GM Authorities. Maintaining existing transitional arrangements may jeopardise these revised submissions to Government regarding the GM Clean Air Plan and may prevent and/or disadvantage vehicle proprietors of non-compliant vehicles in Bury from accessing future GM clean taxi fund funding.
- 3.3 It is recommended that the Licensing and Safety Committee considers and adopts the following amendment to the existing emission standard and recommends to Full Council that amendment is approved:

For existing vehicle licence proprietors:

1. That the transitional arrangements amended by Full Council on 22 March 2023, in relation to age and emissions, previously extended from 1 April 2024 to 1 April 2026, are amended again and to be in effect from 1 January 2026. This will enable hackney carriage and private hire vehicle owners to meet the agreed GM emissions standard outlined in the revised GM Clean Air Plan submissions. The amended policy will state that from 31 December 2024 a vehicle licence will not be renewed if the vehicle does not meet the current emission standard.

APPENDIX 1: Outcome of the engagement exercise of vehicle proprietors and trade representatives on the proposed amendment to transitional arrangements related to vehicle emissions standards (redacted).

Appendix 1.1 and 1.2 show all redacted responses received from the engagement exercise of 225 vehicle proprietors who are currently in receipt of existing transitional arrangements.

Appendix 1.1

What are your views on moving transitional arrangements implementation date?

Renewal Period	Licence Type	Comment	For/Against/ Not Applicable
Jan-Mar	PHV	No comment	NA
Jan-Mar	PHV	I would have preferred the implementation in April simply because this would have given us the extra time to fulfil the requirements.	Against
Jan-Mar	PHV	Can you guarantee that drivers will get a contribution to get a new car? I'm happy to get one year out of my car and I'm happy that I will receive a nice deposit for a new car from the fund	NA
Jan-Mar	PHV	Couple of months wont make a big difference but the longer we get the better for drivers affected.	Both For and Against
Jan-Mar	PHV	email is very complicated and difficult to understand. I am looking for a new vehicle soon but want to know if I can get grant support and when	NA
Apr-Dec	PHV	I am objection with the change if date	Against
Apr-Dec	HCV	I believe that it is better if the implementation date is in April	Against
Apr-Dec	PHV	i dont want this date changes. it is unfair and we should not be made to buy vehicles earlier. if date is january we have to look for car at least 2-3 months before deadline. we cannot afford this as a trade	Against
Apr-Dec	PHV	i have no issues with whatever Bury Council Decide	For
Apr-Dec	PHV	I have no problem at all moving the date to 1/1/26	For
Apr-Dec	PHV	I have received the below email informing me that I can Relicence my vehicle Reg number ***** and private hire plate number ***** only for one more year.My views on moving the implementation date from 1/4/2026 to 1/1/2026 are that it's totally unfair and unnecessary burden for me and I cannot afford to pay for a car on finance or buy as before my car supposed to be eligible to licence by 1/4/2026.So moving dates from 1/4/2026 to 1/1/2026 means that I am losing a year on my car and I have to buy a new car a year earlier which is financially not possible for me and it will bring unnecessary hardship for me.I hope that you will be able to find a solution or recommendations for all those drivers like me in this same situation. Thanks	Against
Apr-Dec	PHV	I hold a positive view regarding the influential decision made regarding the new rule implementation.	For
Apr-Dec	PHV	I prefer date from 1/4/2026	Against

Apr-Dec	PHV	I reject this proposal as we will have to buy a vehicle earlier to meet standards. We are struggling financially already.	Against
Apr-Dec	PHV	I think 1/1/2026 is a great idea. sooner we get clean cars on road better for all of us	For
Apr-Dec	PHV	I was under the illusion my was gonna run for 2 years so I gmhave spent substantial amount money on it now u telling me its only 1 yr. U have bought the date forward so my vehicle can only run for one Yr but I have spent substantial amount of money on this vehicle because I thought it was running fpr 2 years so no I have insufficient funds to replace the vehicle. Looking forward to your response As u have changed the rules again I have Not git sufficient funds 2 get new vehicle but my vehicle is kept 2 very high standard	Against
Apr-Dec	PHV	I will lose much more than 3 months on my veichle and have to buy a car earlier which will be financial burden on me	Against
Apr-Dec	PHV	I would like to keep this date at April unless its proven i wont be financially affected as we dont have enough information	Against
Apr-Dec	PHV	I would not like the implementation date bringing forward. I would be forced to having to buy a new vehicle earlier, which I can't afford so I'll probably have to give up private hire driving earlier.	Against
Apr-Dec	HCV	I would prefer the date to stay at 1/4/26 and not be moved 3 months earlier	Against
Apr-Dec	PHV	It's will reduce the time of damage to the air and to help the environment improve	For
Apr-Dec	HCV	just going to have to go with the proposal and the dates of the proposal being changed	For
Apr-Dec	PHV	Makes no difference	NA
Apr-Dec	PHV	No problem with the date moving forwards	For
Apr-Dec	PHV	provide more information on the grant availability date then I can provide some feedback. everything is very unclear	NA
Apr-Dec	HCV	that is not a good idea.It will not work in a positive way. In this way we hackney drivers lose tha value of our existing vehicle when we go to sell it to up grade our vehicles.	Against
Apr-Dec	PHV	this will be very difficult for me as I cannot afford a new vehicle	Against
Apr-Dec	PHV	this will put a financial pressure on drivers but im not sure what all this means	Against
NA	Trade Rep 1*	due to financial crisis implementation date, instead of decrease should be increased	Against
NA	Trade Rep 2*	Fair enough, I was wondering how we could best reply to that request in our usual professional manner, but now we don't need to	For
NA	Trade Rep 3*	I am writing on behalf of **** to address an important matter regarding the scheduled date planned to brought forward As an organization representing members of	Against

		<p>the taxi trade industry, we are deeply concerned about the financial challenges they are currently facing.</p> <p>In light of the precarious financial situation experienced by our members, many of whom are struggling to make ends meet, we urgently request that the date of not be brought forward until grant packages are confirmed. These grants are essential for supporting our members in overcoming their financial difficulties and ensuring the sustainability of their businesses.</p> <p>We believe that maintaining the current date is crucial for providing a sense of stability and certainty to our members during this uncertain time. Any changes to the date could have significant implications for their ability to participate and benefit from the event, further exacerbating their financial struggles.</p> <p>we understand the importance of compliance with clean air regulations and the need to transition to cleaner and more environmentally friendly vehicles. However, we are also aware of the financial challenges faced by many taxi operators, particularly when it comes to upgrading their vehicles to meet these standards. Past 4 years we are getting information there will be grants for the none compliance vehicle but we haven't seen significant progress from any relevant authorities. So we urge bury licensing to assist the taxi trade</p> <p>We kindly ask for your understanding and support in honoring our request to keep the date unchanged until the grant packages are confirmed. This will allow our members to plan accordingly and maximize the opportunity to access the necessary financial assistance for their businesses.</p> <p>We are willing to collaborate with the licensing authority to find mutually beneficial solutions and ensure the successful outcome of [event\meeting] while prioritizing the needs of our members in the taxi trade industry.</p> <p>Thank you for considering our request. Should you require any further information or clarification, please do not hesitate to contact us</p>	
NA	Trade Rep 4*	I would question what benefit would be gained for the trade in losing 3 months will have	Against

**Responses from trade representatives were received prior to the detailed discussions held at the Trade Liaison Meeting held on the 15 February 2024.*

Table 4: Trade Responses on moving transitional implementation date.

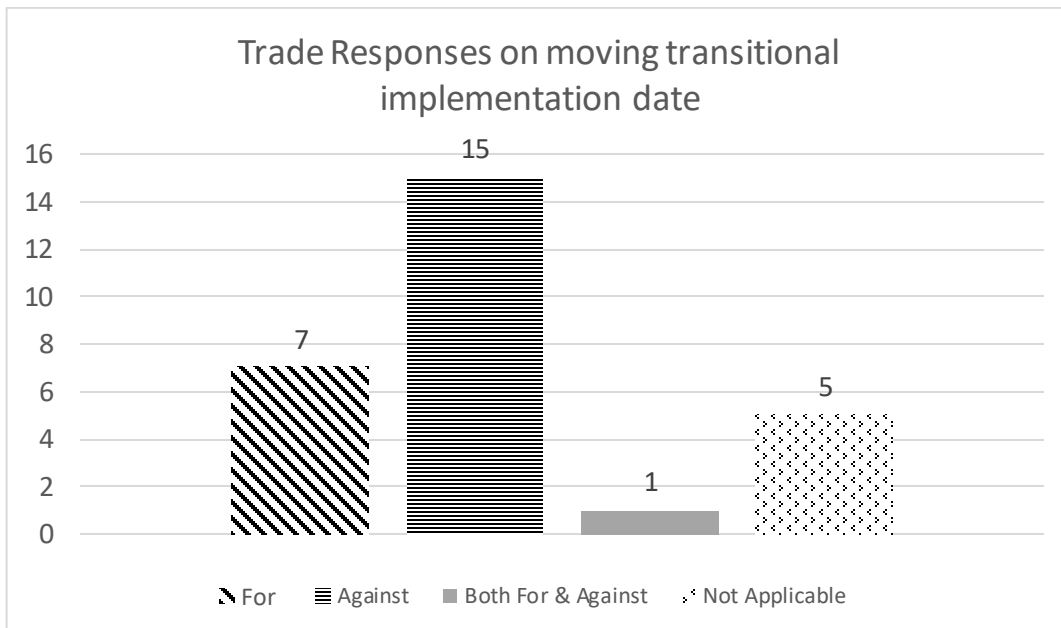
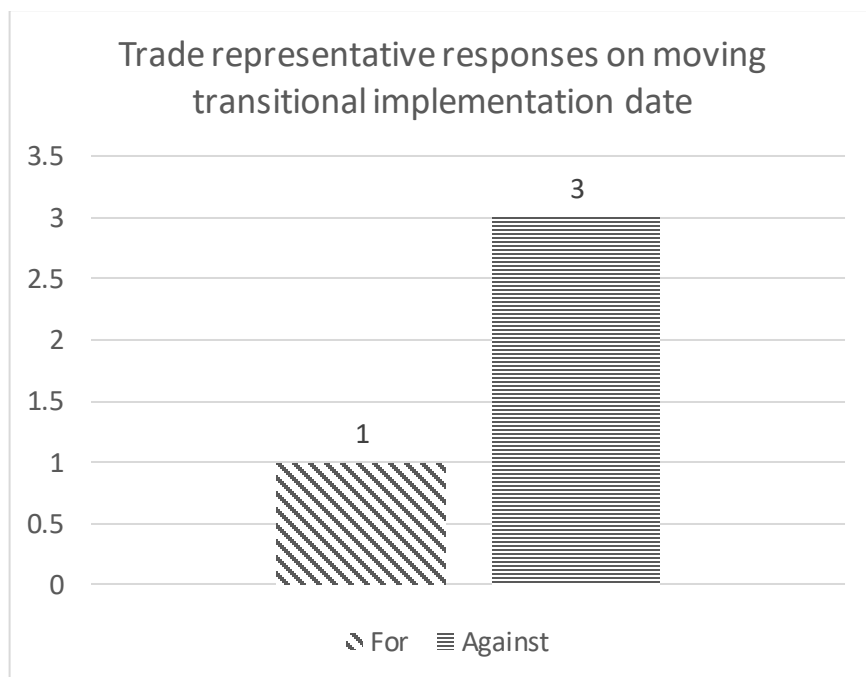


Table 5: Trade representative responses on moving transitional implementation date (*prior to Trade Liaison Meeting held on 15 February 2024*).



Appendix 1.2

What are your views on your ability to meet this proposed amendment?

Renewal Period	Licence Type	Comment	Able/Unable/ Neither Able or Unable/ Not Applicable
Jan-Mar	PHV	i oppose these changes	Unable
Jan-Mar	PHV	I think it may be difficult due to the current cost of living crisis and increased costs for vehicle.	Unable
Jan-Mar	PHV	As you are aware most drivers have language problems and are unable to understand the email that you have sent . So you might not get a reply from them all . I understand exactly what's going on . If you guarantee that if the date is pulled forward and drivers will Have access to the fund then yes . But if you change your mind again and again like you always do . Then you have cheated the drivers out . Lots of drivers whose plates will end next year will probably go and get licensed in Wolverhampton and get 2 years extra . I'm happy for the date to be brought back so drivers can get some of that money to get a new car	Neither Able or Unable/
Jan-Mar	PHV	Couple of months wont make a big difference but the longer we get the better for drivers affected.	Neither Able or Unable/
Jan-Mar	PHV	finding a vehicle around this time will create a backlog for drivers but may not affect me as I will possibly buy a vehicle sooner	Unable
Jan-Mar	PHV	as long as we get grants to help purchase vehicles im fine with it	Able
Jan-Mar	PHV	I have received the below email informing me that I can Relicence my vehicle Reg number ***** and private hire plate number ***** only for one more year.My views on moving the implementation date from 1/4/2026 to 1/1/2026 are that it's totally unfair and unnecessary burden for me and I cannot afford to pay for a car on finance or buy as before my car supposed to be eligible to licence by 1/4/2026.So moving dates from 1/4/2026 to 1/1/2026 means that I am losing a year on my car and I have to buy a new car a year earlier which is financially not possible for me and it will bring unnecessary hardship for me.I hope that you will be able to find a solution or recommendations for all those drivers like me in this same situation. Thanks	Unable
Jan-Mar	PHV	My ability is very hard and trying as I have bought a new Toyota corolla on 01 August 2023 and I am paying £453.35 monthly for the car and £63.21 each month for servicing, which I am currently struggling to pay at the moment. So if the clean taxi fund help me to pay some money to Toyota which will be very helpful for me. Otherwise it will be impossible for me to continue to pay this amount.	Neither Able or Unable/

Jan-Mar	PHV	We will struggle to meet this and our trade reps have taken our views to refuse this. Please take the trade rep views as ours.	Unable
Jan-Mar	PHV	I was under the illusion my was gonna run for 2 years so I gmhave spent substantial amount money on it now u telling me its only 1 yr. U have bought the date forward so my vehicle can only run for one Yr but I have spent substantial amount of money on this vehicle because I thought it was running fpr 2 years so no I have insufficient funds to replace the vehicle. Looking forward to your response As u have changed the rules again I have Not git sufficient funds 2 get new vehicle but my vehicle is kept 2 very high standard	Unable
Jan-Mar	PHV	the christmas period is very busy and changing a vehicle around this time would be a big challenge	Neither Able or Unable/
Jan-Mar	PHV	I have to upgrade my car on new standard,It's not easy for me If I see the living cost rising but the idea of benefits we will have with clean air zone are much higher	Unable
Jan-Mar	PHV	As the date change is only a few months, i don't think it will cause any more problems than drivers already have.	Able
Jan-Mar	PHV	if the grant is the right amount and fair I could meet any standards	Able
Jan-Mar	HCV	Its too hard to meet this proposal at this time.	Unable
Jan-Mar	PHV	christmas period is busy and I cannot buy a vehicle around this time and if i buy earlier i lose time on my vehicle	Neither Able or Unable/
Jan-Mar	PHV	will be difficult to buy new vehichle earlier TFGM need to relook at funding amount for second hand market	Unable
Apr-Dec	PHV	I will try my best to meet the proposed amendment	Able
Apr-Dec	HCV	I would have preferred the system now without these amendments.	Unable
Apr-Dec	PHV	i want you to listen to our trade reps as they oppose this change too.	Unable
Apr-Dec	PHV	I have been looking to change to meet requirements but everything is so expensive at the moment.. So any help at all from the govt will be greatly received.	Able
Apr-Dec	PHV	My picture of ability to meet this proposed amendment will be wider next year	Neither Able or Unable/
Apr-Dec	PHV	I think 1/1/2026 is a great idea. sooner we get clean cars on road better for all of us	Able
Apr-Dec	PHV	i oppose this change and do not want to lose any time as my vehicle expires around june/july so i will have to buy a vehicle 6 months earlier	Unable
Apr-Dec	PHV	I would not like the implementation date bringing forward. I would be forced to having to buy a new vehicle earlier, which I can't afford so I'll probably have to give up private hire driving earlier.	Unable

Apr-Dec	HCV	The proposed amendment will make it very difficult to meet what is outlines as three months is a substantial amount of time	Unable
Apr-Dec	HCV	I will try my best to meet these requirements, but it will be difficult to do as i won't be able to afford a new taxi, there is hardly any work the business is very quiet, please take that into consideration, a lot of money is needed for a new taxi which is really hard to earn when the taxi business is so low.	Neither Able or Unable/
Apr-Dec	PHV	Makes no difference happy with	Able
NA	Trade Rep 1*	Non of our member able to meet this proposed amendment due trade financial hardship.	Unable
NA	Trade Rep 2*	Fair enough, I was wondering how we could best reply to that request in our usual professional manner, but now we don't need to	Able
NA	Trade Rep 3*	<p>I am writing on behalf of **** to address an important matter regarding the scheduled date planned to brought forward As an organization representing members of the taxi trade industry, we are deeply concerned about the financial challenges they are currently facing.</p> <p>In light of the precarious financial situation experienced by our members, many of whom are struggling to make ends meet, we urgently request that the date of not be brought forward until grant packages are confirmed. These grants are essential for supporting our members in overcoming their financial difficulties and ensuring the sustainability of their businesses.</p> <p>We believe that maintaining the current date is crucial for providing a sense of stability and certainty to our members during this uncertain time. Any changes to the date could have significant implications for their ability to participate and benefit from the event, further exacerbating their financial struggles.</p> <p>we understand the importance of compliance with clean air regulations and the need to transition to cleaner and more environmentally friendly vehicles. However, we are also aware of the financial challenges faced by many taxi operators, particularly when it comes to upgrading their vehicles to meet these standards. Past 4 years we are getting information there will be grants for the none compliance vehicle but we haven't seen significant progress from any relevant authorities. So we urge bury licensing to assist the taxi trade</p> <p>We kindly ask for your understanding and support in honoring our request to keep the date unchanged until the grant packages are confirmed. This will allow our members to plan accordingly and maximize the</p>	Unable

		<p>opportunity to access the necessary financial assistance for their businesses.</p> <p>We are willing to collaborate with the licensing authority to find mutually beneficial solutions and ensure the successful outcome of [event/meeting] while prioritizing the needs of our members in the taxi trade industry.</p> <p>Thank you for considering our request. Should you require any further information or clarification, please do not hesitate to contact us</p>	
NA	Trade Rep 4*	Would be the same as now, is there vehicles for drivers out there to get and how many Hackneys will be lost to Private Hire, how many will be lost over cost?	Neither Able or Unable/

**Responses from trade representatices were received prior to the detailed discussions held at the Trade Liaison Meeting held on the 15 February 2024.*

Table 6: Trade responses regarding their ability to meet the proposed changes.

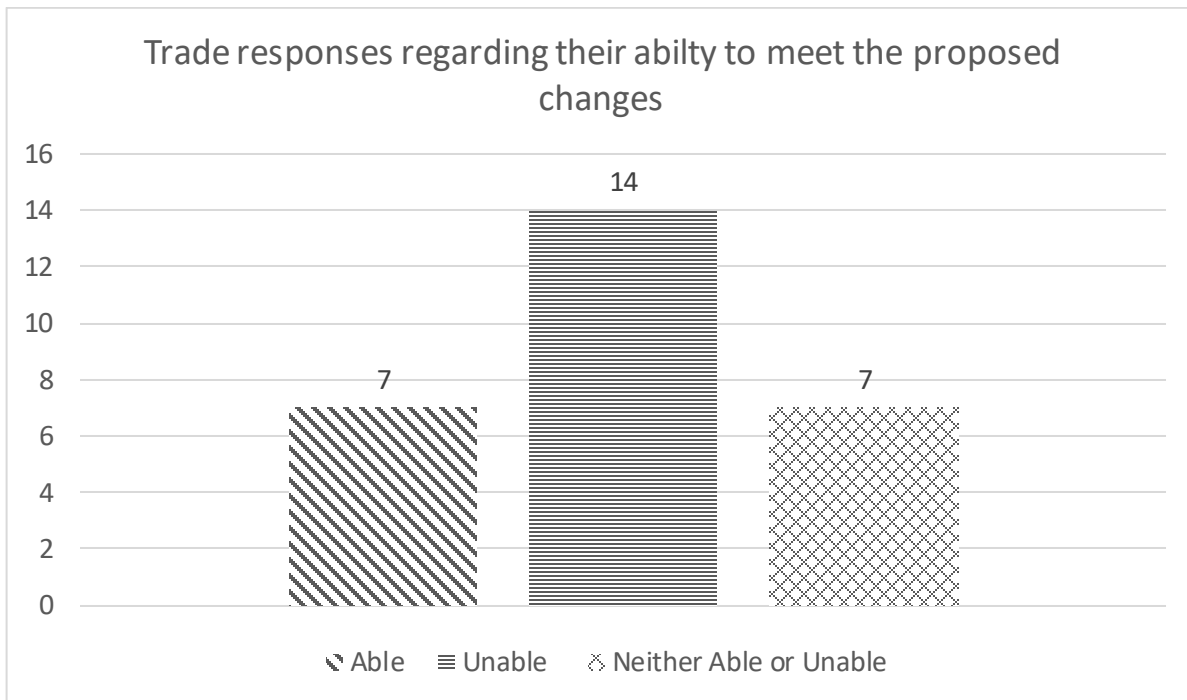
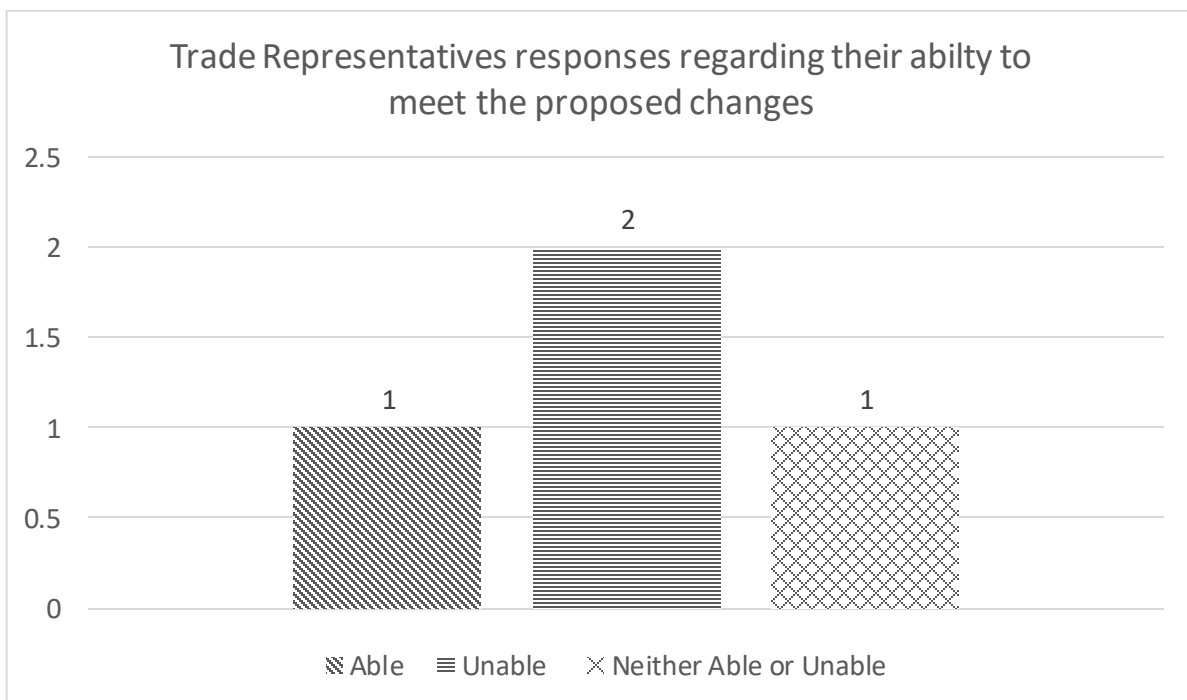


Table 7: Trade Representatives responses regarding their ability to meet the proposed changes (prior to Trade Liaison Meeting held on 15 February 2024).



Appendix 1.3

Outcome of Trade Liaison Meeting held on 15 February 2024

The meeting was attended by 4 trade bodies and 1 private hire operator.

Detailed discussions were undertaken following an explanation of the proposals and implications of amending the current emissions standards transitional arrangements from 1 April 2026 to 1 January 2026 and the necessary governance processes for making any changes.

There was shared agreement regarding concerns about the uncertainty of detail around the clean taxi fund, funding amounts, application, and determination process/criteria. Attendees of the Trade Liaison Meeting understood the reason for the proposed changes to bring Bury's emissions standards policy in line with the revised GM Clean Air Plan submissions to Government which are part of the proposed investment led model.

Following these discussions there was agreement by attendees of the Trade Liaison Meeting and the private hire operator and support for the proposed changes to the implementation date of the emissions standard from 1 April 2026 to 1 January 2026. They agreed this would enable access to the proposed financial support packages relating to the revised GM Clean Air Plan. They agreed by maintaining the current emissions policy and implementation date of 1 April 2026 may consequently result in Bury's Hackney Carriage and Private Hire trades not being able to access any future funding linked to the revised GM Clean Air Plan submissions to Government.

However, attendees of the Trade Liaison Meeting noted and agreed if the revised GM Clean Air Plan submissions were not accepted by Government and/or the Clean Taxi Fund was delayed further or withdrawn, they asked if the Council's licensing service would consider re-evaluating the emissions standard transitional implementation date accordingly.

Appendix 1.4

Minute extract from the Licensing and Safety Committee held on the 22nd February 2024

Minutes of:	LICENSING AND SAFETY COMMITTEE
Date of Meeting:	22 nd February 2024
Present:	Councillor G McGill (in the Chair) Councillors J Grimshaw, K Hussain, B Ibrahim G Marsden, D Quinn, I Rizvi, J Rydeheard and M Walsh.
Also in attendance:	M Bridge- Licensing Unit Manager M Cunliffe – Democratic Services R Thorpe – Legal Advisor B Thomson- Head of Public Protection
Public Attendance:	No members of the public were present at the meeting.

REVIEW OF EMISSIONS STANDARD TRANSITIONAL IMPLEMENTATION DATE FOR EXISTING HACKNEY CARRIAGE AND PRIVATE HIRE VEHICLES TO COMPLIANT VEHICLE IN RESPECT OF PROPOSED GM CLEAN AIR PLAN

The Executive Director (Operations) submitted a report outlining the proposal to bring forward the implementation of existing standards related to emissions from the 1st April 2026 to the 1st January 2026 for licensed vehicles eligible for current transitional arrangements. The rationale for this relates to the recent submissions to Government with revised proposals around the GM Clean Air Plan and requirement from Government to ensure a GM agreed emissions standard for all Taxi and Private Hire vehicles by the 31st December 2025.

The Head of Public Protection presented the report to Members and outlined the opportunity and risk element of the paper. Members were reminded that this matter was considered at the previous Licensing and Safety Committee meeting on the 1st February 2024. Members resolved to defer consideration of this matter until tonight's meeting.

Following the request from Members of the Licensing and Safety Committee on the 1st February 2024, the Licensing Service undertook an engagement exercise which included contacting the 225 affected vehicle proprietors who are currently in receipt of transitional arrangements. An initial email was sent on the 6th February 2024 and reminder email was sent on the 12th February 2024 asking for responses to the two questions requested by members of the committee;

- a. What are your views on moving the implementation date from 1 April 2026 to the 1st January 2026*
- b. What are your views on your ability to meet this proposed amendment?*

The engagement exercise sought views on the proposals to bring forward the transitional arrangements in respect of the existing emissions standard by three months (1 April 2026 to 1 January 2026). In addition to the email correspondence, the Councils Licensing Engagement Officer contacted a range of vehicle proprietors affected to gain their views.

The results of the engagement exercise had been forwarded to Members of the Licensing and Safety Committee. The collation of information from the Trade Liaison meeting on the 15th February 2024 and the responses were annexed at Appendix 1 to the report attached to the agenda pack.

The report sought to amend the existing transitional arrangements which are due to end on the 1st April 2026 by bringing forward three months with a proposed implementation date of the 1st January 2026. This amendment affects the implementation date of the existing emission standard which was agreed and adopted by the Council, and has been in place for all new to fleet vehicles, since 24 November 2021.

If the transitional date was not amended as outlined above, the Councils transitional arrangements policy will not be aligned with the submissions to Central Government by TfGM for the revised GM CAP which proposes that by 1 January 2026 100% of the GM taxi fleet will be compliant with the emission standards with all GM Authorities. Maintaining existing transitional arrangements may jeopardise these revised submissions to Government regarding the GM Clean Air Plan and may prevent and/or disadvantage vehicle proprietors of non-compliant vehicles in Bury from accessing future GM clean taxi fund funding.

It was recommended in the report that the Licensing and Safety Committee considered and adopted the following amendment to the existing emission standard and recommended to Full Council that the amendment be approved:-

For existing vehicle licence proprietors

That the transitional arrangements agreed by Full Council on 22 March 2023, in relation to age and emissions standards that were previously extended from 1 April 2024 to 1 April 2026 are brought forward by three months to 1 January 2026. This will enable hackney carriage and private hire vehicle owners to meet the agreed GM emissions standard outlined in the revised GM Clean Air Plan. The amended policy will state that from 31 December 2024 a vehicle licence will not be renewed if the vehicle does not meet the current emission standard.

The Chair reported that he had attended the Trade Liaison meeting and commented that face to face meetings were more beneficial to gauge accurate responses and feelings rather than surveys.

A Member thanked the Licensing Service for collating the extra information requested from the last meeting.

The Licensing Unit manager confirmed that with a change of vehicle application under this scheme, the transfer period would see a lower fee charged. Members who had concerns about drivers applying for licences with other authorities were reminded that to be eligible for this funding, they had to be licenced via a Greater Manchester authority. They also had to stay licenced within GM for a set period of time or risk repaying the funding. A discussion took place to investigate if the number of vehicles registered outside of Bury could be obtained.

Delegated decision:

It was agreed by the Licensing and Safety Committee to adopt the following amendment (1) to the existing emission standard and recommended to Full Council that the amendment (1) be approved:

For existing vehicle licence proprietors:

1. That the transitional arrangements amended by Full Council on the 22nd March 2023, in relation to age and emissions, previously extended from the 1st April 2024 to the 1st April 2026, are amended again and to be in effect from the 1st January 2026. This will enable hackney carriage and private hire vehicle owners to meet the agreed GM emissions standard outlined in the revised GM Clean Air Plan submissions. The amended policy will state that from the 31st December 2024 a vehicle licence will not be renewed if the vehicle does not meet the current emission standard.