

APPENDIX A to CAZ Grant Mitigations M1a, M2a and M2c Cabinet Report

FULL BUSINESS CASE (FBC)

A. GENERAL INFORMATION

A1. General

Project Title <i>(as per Voyager)</i>	Clean Air Zone Mitigations – M1a CAZ Worker Mobility Credit Grant, M2a Hackney Carriage Vehicle Support Grant and M2c Private Hire Vehicle Support Grant		
Voyager code			
Portfolio /Committee	Transport and Environment / Sustainability Committee	Directorate	Inclusive Growth
Approved by Project Sponsor	Phil Edwards	Approved by Finance Business Partner	Simon Ansell

A2. Outline Business Case approval *(Date and approving body)*

This FBC is a derivative of the overarching Clean Air Zone Government Final Business Case (GFBC) which was approved by Cabinet on 11th December 2018. These projects form part of the Clean Air Zone (CAZ) mitigations programme for which grant funding has been secured through the Clean Air Fund (CAF).

Following the GFBC approval, funding of £17.420 million was subsequently offered by JAQU (the Joint Air Quality Unit) and accepted by the Council in March 2020 for these specific schemes, confirmed in letters received by Council representatives on 20th March 2019 which detail CAZ mitigations capital and revenue funding.

This FBC relates to Mitigations M1a (Mobility Credit Grant), M2a (Hackney Carriage Vehicle Grant) and M2c (Private Hire Vehicle Grant). Each of these grants will be processed, and their award validated, by the CAZ team. This FBC details the application and validation process, and the mechanism by which the grants will be released. The total capital expenditure is £9.500 million and the total revenue expenditure is £9.920 million, funded from £17.420m CAF Grant and, subject to approval of this FBC, £2.000m CAZ net revenue proceeds.

For clarity and ease of reference, the table in section G3 details all of the mitigation measures and associated grants that are being implemented as part of the CAZ mitigations programme. Those pertinent to this FBC are shown in bold italics.

A3. Project Description

The GFBC detailed a series of mitigation measures to offset the financial impact of the CAZ on selected vulnerable groups within Birmingham. This FBC relates specifically to Mitigations M1a, M2a and M2c which are summarised below.

Mitigation M1a – CAZ Workers.

M1a CAZ Worker Grant - £10.840m of grant funding for CAZ workers who earn less than £0.030m annually. This is broken into two schemes. The first offers up to £0.002m in mobility credit for use of the TfWM Swift network in return for scrapping a non-compliant car. The total for this first scheme is £5.420m of revenue funding. The second scheme offers £0.002m towards the purchase of a compliant vehicle in return for scrapping a non-compliant vehicle. This is detailed in a separate FBC for expediency as it requires a bespoke procurement process; the total for this second scheme is £5.420m of capital funding.

Additionally, there is an exemption that applies to this group as well. This means they have the option to be exempt from CAZ charging for one year and, in order to encourage behavior change in those who may not be able to give up their vehicle, there is the option of £0.001m of mobility credit at the end of the exemption period – each applicant may only apply for grant funding once. The £5.420 million revenue fund that is available equates to mobility credit incentives for up to 2,710 CAZ workers.

APPENDIX A to CAZ Grant Mitigations M1a, M2a and M2c Cabinet Report

The CAF report recommended that the Transport for West Midlands Swift smartcard scheme would offer the most comprehensive 'one-stop-shop' for mobility credit in the West Midlands. Part of this project will be to establish a Grant Agreement with TfWM to enable eligible CAZ workers to benefit from the available mobility credit options.

Mitigation M2a – Hackney Carriage Grant Scheme. This mitigation scheme is comprised of £5.000m (£2.500m capital and £2.500m revenue) of grant funding for Hackney Carriage Vehicle (HCV) drivers who have been licensed with Birmingham City Council since 10th Sept 2018 and who drive non-compliant vehicles.

Option 1 – £0.005m towards CVRAS accredited retrofit installation.

Option 1 - Grant funding of up to £0.005m can be applied for towards the installation of CVRAS3 accredited retrofit technology. A list of CVRAS accredited solutions can be found at: businessbreathes.co.uk/retrofit-vehicle-solutions - vehicles retrofitted with technology outside of this scheme will not be eligible for funding.

To take advantage of this option drivers would need to:

1. Confirm that they own a Birmingham City Council licensed hackney carriage.
2. Register interest with a retrofit provider (this may include a refundable deposit, depending on the provider). The retrofit provider would then carry out a check on their vehicle to ensure that it is suitable for the retrofit solution.
3. Sign the grant terms and conditions
4. Make a reservation with the retrofit provider. The provider may require them to pay a holding deposit.
5. Provide evidence of the retrofit installation to the Council. The Council will make a single payment of the cost of the retrofit installation (up to a maximum value of £5,000 against pre-VAT cost).

Option 2 - Grant funding of up to £0.005m towards operational expenses of an Ultra-Low Emission Vehicle (ULEV) HCV.

The Council will provide grant funding of up to £0.005m as a contribution to the operating expenses of Birmingham licensed ULEV hackney carriage vehicles. This funding will likely consist of four annual payments of up to £0.00125m each, which could be used to cover costs such as electric charging, insurance, servicing, ranking fees etc.

To take advantage of this option the driver would need to:

1. Organise the purchase or long term lease of an electric hackney carriage.
2. On delivery of the vehicle provide evidence that they have purchased or leased the electric taxi in question and sign the grant terms and conditions.
3. Before each annual payment, they must provide evidence that they are still in possession of the vehicle and of running costs incurred.

Since the CAF report was produced, and changes to the delivery timescales, a further addition to the charging order has been proposed to exempt taxis from charging whilst on the waiting list for a retrofit. This will be confirmed when the final charging order is made.

Additionally, recent discussions with ULEV manufacturers have highlighted that a warranty and maintenance package may be available for purchase in the near future. For a 5 year period this would likely cost £0.0025m - £0.003m. Although not currently specified as an option, such a package complies with the conditions of the revenue grant funding and will be considered as part of the scheme if it becomes available whilst the scheme is operating. This is consistent with the grant funding conditions.

APPENDIX A to CAZ Grant Mitigations M1a, M2a and M2c Cabinet Report

The CAF report stated that, in the case of retrofits, the retrofit provider would claim back the grant funding from the Council upon completion of works, rather than the individual applicant. This would have required a Single Contract Negotiation (SCN) to be undertaken with what is currently the only CVRAS approved retrofit provider. It has since been decided that this could be counterproductive and discourage other retrofit providers from entering the market, with potential State aid implications. Additionally, there is likely to be a further retrofit provider that enters the market in the future. By developing a mechanism that allows individual taxi drivers to receive grant funding, which is a change from the CAF report, the Council will not have to enter in to additional agreements when additional retrofit options are available.

Mitigation M2c – Private Hire Vehicle Grant Scheme. This mitigation scheme is comprised of £9.000m (£7.000m capital and £2.000m revenue) for Birmingham registered PHV drivers who will have three options from which to choose in order to upgrade non-compliant vehicles. These options will also be available for retrospective application if vehicles have been upgraded since the date the CAZ was officially announced, 10th Sept 2018. The three options available are:

Option 1 - Upgrade to a CAZ compliant diesel or petrol vehicle.

This option is available to Birmingham registered drivers who own or lease a private hire vehicle and to PHV leasing companies with vehicles licensed by Birmingham City Council. They must currently have a PHV which is not compliant with Clean Air Zone standards (petrol Euro 4, diesel Euro 6).

The Council will provide grant funding of up to £0.001m towards the purchase or long term lease of a CAZ compliant petrol or diesel vehicle which meets the requirements of Birmingham City Council's licensing policy.

To take advantage of this option applicants will need to:

1. Register interest in the scheme.
2. Purchase or lease a compliant vehicle.
3. On delivery of the vehicle provide proof of purchase or lease and an assessment of the vehicle's value, and sign the grant terms and conditions.

The Council will make a single payment to reimburse them for up to £0.001m of the vehicle's pre-VAT cost.

- Once they have purchased or leased the new vehicle, the old vehicle can no longer be licensed by Birmingham City Council.
- Funding can only be applied to a vehicle once. This means that some drivers may not be able to receive funding if they are leasing a vehicle which has already received funding.
- If they have already purchased (or have a lease in place for) a CAZ compliant diesel or petrol PHV they would still be able to apply (with suitable evidence) for this grant. This only applies for purchases or leases after 10 September 2018.

Option 2 - Upgrade to a hybrid or plug-in hybrid electric vehicle.

This option is available to Birmingham registered drivers who own or lease a private hire vehicle and to PHV leasing companies with vehicles licensed by Birmingham City Council. They must currently have a PHV which is not compliant with Clean Air Zone standards (petrol Euro 4, diesel Euro 6).

The Council will provide grant funding of up to £0.002m towards the purchase or long term lease of a plug in hybrid electric vehicle or hybrid electric vehicle that is not eligible for the Government's plug-in grant. The vehicle must be CAZ compliant and meet the requirements of Birmingham City Council's licensing policy.

To take advantage of this option those eligible will need to:

1. Register interest in the scheme.

APPENDIX A to CAZ Grant Mitigations M1a, M2a and M2c Cabinet Report

2. Purchase or lease a suitable vehicle.
3. On delivery of the vehicle provide proof of purchase or lease and an assessment of the vehicle's value, and sign the grant terms and conditions.

The Council will make a single payment to reimburse them for up to £0.002m of the vehicle's pre-VAT cost.

- Once they have purchased or leased the new vehicle, the old vehicle can no longer be licensed by Birmingham City Council.
- Funding can only be applied to a vehicle once. This means that some drivers may not be able to receive funding if they are leasing a vehicle which has already received funding.
- There are currently a relatively small number of public electric charging points available within Birmingham. The Council is set to expand this network with at least 197 new charging points (including at least 97 rapid charge points) across the city.
- If applicants want to install an electric vehicle charge point at home, the government's Electric Vehicle Homecharge Scheme provides grant funding of up to 75% towards the cost of installing smart charge points at domestic properties across the UK.
- If they have already purchased (or have a lease in place) a plug in hybrid or hybrid electric PHV they would still be able to apply (with suitable evidence) for this grant. This only applies for purchases or leases after 10 September 2018.

Option 3 - Upgrade to a fully electric or long range plug-in hybrid vehicle.

This option is available to Birmingham registered drivers who own or lease a private hire vehicle. They must currently have a PHV which is not compliant with Clean Air Zone standards (petrol Euro 4, diesel Euro 6), or have upgraded since the date CAZ was officially announced, 10th Sept 2018.

The Council will provide grant funding as a contribution to the operating expenses of a fully electric vehicle or long-range plug-in hybrid vehicle. This is defined as vehicles that are eligible for the Government's plug-in grant. The funding will consist of either two annual payments of £0.00125m or a single payment of £0.0025m (subject to evidenced costs), which could be used to cover costs such as electric charging, insurance, servicing etc.

To take advantage of this option those eligible will need to:

1. Register interest in the scheme.
 2. Purchase or lease a suitable vehicle.
 3. On delivery of the vehicle provide proof of purchase or lease and sign the grant terms and conditions.
 4. Before payment, provide evidence that they are still in possession of the vehicle and of the running costs incurred.
- Once they have purchased the new vehicle, the old vehicle can no longer be licensed by Birmingham City Council.
 - The Government's plug-in grant means that the purchase price of the vehicle will already have been discounted by up to £0.0035m.
 - There are currently a relatively small number of public electric charging points available within Birmingham. The Council is set to expand this network with at least 197 new charging points (including at least 97 rapid charge points) across the city.
 - If users want to install an electric vehicle charge point at their home, the government's Electric Vehicle Homecharge Scheme provides grant funding of up to 75% towards the cost of installing smart charge points at domestic properties across the UK.
 - If they have already purchased (or have a lease in place) an electric PHV they would still be able to apply (with suitable evidence) for this grant. This only applies for purchases or leases after 10 September 2018.

A4. Scope

APPENDIX A to CAZ Grant Mitigations M1a, M2a and M2c Cabinet Report

The scope of these projects/schemes is to establish the process detailed in the Management Case for processing grant applications, and therefore enable the distribution of grants to the vulnerable groups identified in Section C. Success will see all of the grant funding utilised which will both assist certain groups in accommodating the CAZ whilst also incentivising cleaner vehicle use and behaviour change.

A5. Scope exclusions

As stated in A3, this FBC does not include the £5.420m of capital funding for mitigation M1a, which is detailed in a separate FBC requiring a bespoke procurement exercise. Additionally, there are three further FBCs in development which detail a Hackney Carriage Rental Scheme, Heavy Duty Vehicle Fund and Non-Compliant Vehicle Scrappage Scheme.

B. STRATEGIC CASE

This sets out the case for change and the project's fit to the Council Plan objectives

B1. Project objectives and outcomes

The case for change including the contribution to Council Plan objectives and outcomes

Programme Objectives

The CAZ mitigation measures programme seeks to provide financial relief to businesses, workers and residents that will be affected by the introduction of the Clean Air Zone. Each measure is designed to help each group by incentivising them to upgrade to compliant vehicles or change their travel behaviours. This aligns with the primary CAZ aim of improving air quality in the city centre.

Project Objectives

This project will:

- Utilise the £17.420m of CAF grant funding that has been secured specifically for these measures.
- Provide £5.420m of grant funded options for behaviour change for lower earning CAZ workers who may face daily charging as a result of their travel habits. This also removes non-compliant cars from circulation.
- Provide £5.000m of grant funded options for the Hackney Carriage community to alleviate some of the cost pressures of upgrading their vehicles to avoid incurring daily CAZ charges. This will also help some to adapt to the new taxi licensing conditions which will be enforced from January 2020.
- Provide £9.000m of grant options for the Private Hire Vehicle community to alleviate some of the cost pressures of upgrading their vehicles to avoid incurring daily CAZ charges. This will include £2.000m of CAZ net revenue proceeds. Again, this will also help some to adapt to the new taxi licensing conditions which will be enforced from January 2020.

City Council Objectives

The implementation of the CAZ mitigation measures will support the delivery of the wider CAZ objectives, contributing to improved air quality whilst also mitigating the impact of a charging CAZ on those most financially vulnerable. This is consistent with the City Council's Plan 2018-2022 (2019 update):

- **Birmingham is an entrepreneurial city to learn, work and invest in** - We want a city that invests in its people, so that everyone can have opportunities to realise their potential through lifelong learning, skills and good jobs. We want to invest in the buildings and transport connections of our city to provide better places to live and work, and to enable businesses to prosper.
 - The mitigation grant funds encourage investment in compliant methods of transportation. This includes state of the art ULEV taxis, and use of the Swift card travel system which is on track for a substantial upgrade in early 2020.
- **Birmingham is a fulfilling city to age well in** - We want citizens to live more active, longer, healthier and independent lives. We want to reduce social isolation so that people can make positive choices and take control of their wellbeing.

APPENDIX A to CAZ Grant Mitigations M1a, M2a and M2c Cabinet Report

- Improving air quality will have a direct impact on the health and wellbeing of citizens and visitors to the city centre. People are encouraged and financially incentivised to use public transport rather than commuting in non-compliant vehicles.
- **Birmingham is a great, clean and green city to live in** - We want Birmingham to be a sustainable city of vibrant culture and flourishing neighbourhoods, with good quality housing. A city with clean air, safe and clean streets, and green spaces. We want to be a city where our citizens have pride in where they live, have a strong sense of belonging, and a voice in how Birmingham is run.
 - The CAZ will directly improve air quality in the city centre. Investing in the City's taxi community will mean the essential service they provide will have much less impact on the immediate environment. This is a further step on the way to a clean and sustainable city.
- **Birmingham is a city that takes a leading role in tackling climate change** - Climate change is an urgent issue with a global reach that directly impacts upon Birmingham residents. We will work with our partners to tackle this issue to make Birmingham a city in which all of our residents, including those from our most deprived communities, can lead healthy, safe, fulfilling lives.
 - Birmingham is one of the first cities to implement a CAZ, and the very first to operate a Charging CAZ type D. It is at the forefront of change in this area and will set the bar for future cities who wish to tackle air quality for their citizens.

B2. Project Deliverables

These are the outputs from the project eg a new building with xm2 of internal space, xm of new road, etc

There are no physical deliverables from this project. A process for validating, approving and issuing grant funding to qualifying applicants will be delivered in accordance with the project objectives in Section B1, facilitating the issuance of grants to businesses, workers and residents that will be affected by the introduction of the Clean Air Zone.

B3. Project Benefits

These are the social benefits and outcomes from the project, eg additional school places or economic benefits.

Measure	Impact
M1a - This mitigation measure will provide a financial incentive to enable those who wish to transition to public transport, from use of a non-compliant car, to do so.	A number of CAZ users will be able to switch to public transport routinely, thereby improving air quality in Birmingham city centre.
M2a – This measure will support the Hackney Carriage community in adapting to the Clean Air Zone implementation.	The HCV trade in Birmingham provides a vital service to visitors to the city centre. This measure assists the trade in adapting to reduce its impact on air quality in the city centre and incentivises the use of compliant technologies.
M2c – This measure will support the Private Hire Vehicle community in adapting to the Clean Air Zone implementation.	The PHV trade in Birmingham provides a vital service to visitors to the city centre and the surrounding area. This measure assists the trade in adapting to reduce its impact on air quality in the city centre and incentivises the use of compliant technologies.

B4. Benefits Realisation Plan

Set out here how you will ensure the planned benefits will be delivered

The benefits will be realised by eligible CAZ businesses, workers and residents applying for the funding. Applicants will apply online via a dedicated website, submitting evidence to support their eligibility for the scheme. Applications will be managed by the CAZ team, who will approve or reject applications. A flow chart of the process is included in Appendices 1, 2 and 3 for mitigations M1a, M2a and M2c respectively.

The CAZ team will monitor the applications and awards process, as well as the success of each scheme. The key benefits should be realised through increasing air quality as vehicles and users

APPENDIX A to CAZ Grant Mitigations M1a, M2a and M2c Cabinet Report

transition to cleaner means. Each grant fund will be assessed to project when it may be fully exhausted, with the communications strategy adaptable to better target those groups where full funding utilisation may be at risk. The Council will undertake a review after the schemes have been running for a period of time, not before September 2020 (decision point 1), which may inform a variation request to the grant award authority should the grant compositions require significant change. This will be based on uptake and expressions of interest and will involve consultation with the Cabinet member.

No indication of any clawback mechanism has been given by the grant award authority at the time of writing.

B5. Stakeholders

A list of stakeholders is in Section G4. This FBC and the mitigations outlined were informed by an extensive consultation exercise.

A statutory public consultation was undertaken by the Council between July and August in 2018. The consultation exercise involved 10,392 respondents along with 386 organisations and businesses. Specifically relevant to this report, the consultation was used to identify groups most vulnerable to the introduction of a Charging CAZ and shape the mitigation grant funds, including those to which this report relates.

An Integrated Impact Assessment (IIA) was undertaken as part of the CAZ feasibility study. The IIA assessed the economic and health impacts of the introduction of a Charging CAZ. As a consequence it identified certain economically vulnerable groups which formed the basis for developing the mitigations measures detailed in this report. As with the IIA, an Equality Impact Assessment (EQUA210) was undertaken which also formed the basis for the CAF report and proposed mitigations.

C. ECONOMIC CASE AND OPTIONS APPRAISAL

This sets out the options that have been considered to determine the best value for money in achieving the Council's priorities

C1. Summary of options reviewed at Outline Business Case

(including reasons for the preferred option which has been developed to FBC)

If options have been further developed since the OBC, provide the updated Price quality matrix and recommended option with reasons.

The economic case as evaluated in the Clean Air Fund Report remains largely extant and is summarised in this section; there have not been material changes to the vulnerable groups which would require the economic case to be amended, nor significant changes in the economy to warrant revisions to the individual grant funding amounts.

The economic case for each mitigation is addressed separately below:

Mitigation M1a – CAZ workers who earn less than £30,000.00 annually.

Target Group

During the feasibility study for the CAZ, a distributional impact analysis (DIA) was conducted. The DIA has shown that those on low incomes will be disproportionately impacted by the CAZ, which is particularly true for those residents and workers who live in close proximity to the CAZ and who must travel for work as they will be unable to avoid incurring CAZ charges. Quantitative analysis outlined in the DIA showed that residents of the most deprived LSOAs (quintile 1) will incur a disproportionately greater amount of the costs than more affluent areas. It also shows that LSOAs within or adjacent to the CAZ would incur the highest proportion of costs relating to the CAZ and that these are also the areas with the highest levels of income deprivation and generally high levels of non-compliant vehicle ownership.

For context, an individual will incur £3,072 of CAZ charges over a 4-year period if they enter the zone twice a week for 48 weeks a year in a non-compliant vehicle.

APPENDIX A to CAZ Grant Mitigations M1a, M2a and M2c Cabinet Report

From the DIA and consultation feedback, there is a clear need to target mitigation measures at residents of the CAZ, those who work within the CAZ and those who regularly enter the CAZ, especially low-income individuals. Mitigation M1a is designed to prioritise low income individuals who live and work within the CAZ for number of reasons:

- Individuals are forced to regularly travel into the CAZ and cannot alter their route to avoid the area, they are therefore most vulnerable to the CAZ charges. The distributional analysis has concluded that low-income residents will be disproportionately impacted.
- The financial circumstances of low-income individuals mean that they are less likely than others to be able to adapt to the CAZ, whether by upgrading their vehicle or by paying the CAZ charges.
- Low income households are more likely to own non-compliant vehicles. There is no definitive data on this, but it is a reasonable assumption considering households with less disposable income are more likely to own car of lower value which are in turn likely to be older vehicles and hence non-compliant. This is supported from evidence from the distributional impact analysis which showed that the LSOAs which will be most impacted by the CAZ charges are those which are in close proximity to the CAZ and have a high degree of low-income households, DfT licencing statistics show that these areas also contain a high proportion of non-compliant vehicles.
- To counter this, low income households are less likely to have access to a vehicle and government data shows that 44% of households in the lowest income quantile do not have access to a vehicle¹. This is however not relevant to this measure as it targets those who do currently own vehicles. The delivery plan and quantification of the scheme is based on vehicle data rather than volume of individuals in the group.

Threshold

The eligibility threshold was set at £30,000.00 of annual income based on analysis of the traffic model that was also produced for the feasibility study. The model forecast the number of trips made into the CAZ for the purpose of work and differentiated between mode of travel and income band. The model estimated that 23,566 people would travel by car and earn less than the £30,000.00 threshold. The CAF recorded the median full time weekly earnings was £569 which equates to a median annual gross income of £29,588.00. Although the salary cap is above the national median, and therefore by definition supporting more than just low-income workers, the Council deemed it important to set the salary cap at this level for a number of reasons. Firstly, an important aspect of this measure is to support local businesses operating in the CAZ as well as the individuals themselves, and concern from business regarding loss of their employees was a major finding from the consultation. As the salary cap is set just above the nation average, it provides for a wide range of employees mitigating this concern from businesses

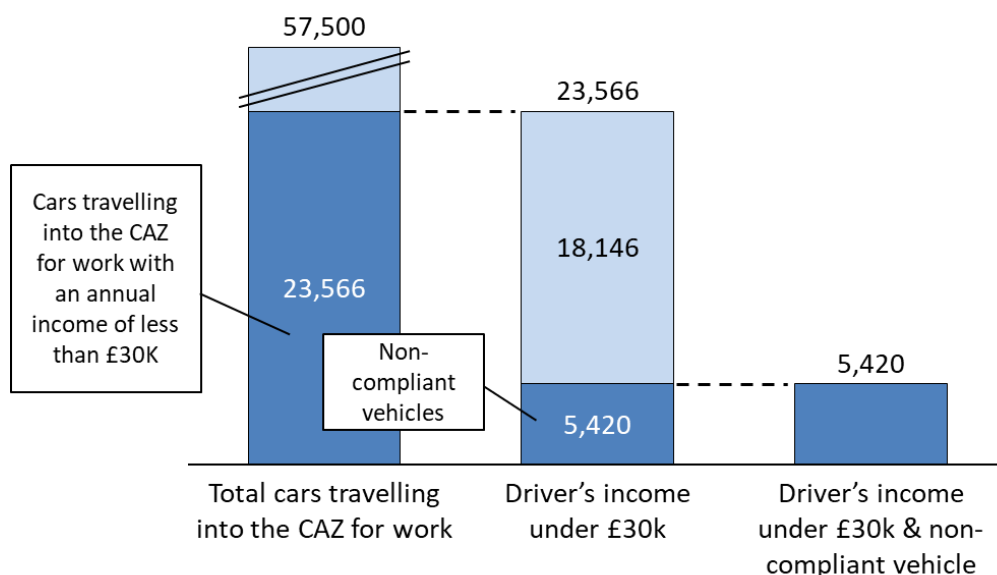
Another justification for setting the cap at this level is to support key workers, a key priority of the Council's when designing the package of mitigation measures. Data from Birmingham Children's Hospital show that 84% of their staff who work antisocial hours earn a salary of less than £30,000, the Hospital states that these staff are necessary to deliver a safe and operational service and their retention must be an absolute priority for any measure targeting workers within the CAZ. Additional data from the NHS trust within Birmingham shows there are 1,439 nurses and health visitors (a proxy for key workers) working for the trust. Most staff classified within this group are highly skilled clinicians and as such are most mostly NHS pay band 6 or above. Out of the 9 pay bands within this level, 3 are under £30,000 and 6 are over. This suggests that a large proportion of key workers working at the trust will be earning over £30,000. To reiterate, the Council considers it absolutely vital to provide support to key workers. The consultation response from the health service cited a study of their staff which showed a significant portion of those with non-compliant vehicles would consider changing working location as a response to the CAZ. To prevent this, and to continue to provide a safe level of health service in the city centre, the financial support offered must be broad and cover the majority of key health workers. The Council believes the £30,000 salary eligibility cap fulfils this criteria.

The expected proportion of non-compliant vehicles in 2020 is taken from the ANPR data and shows that 23% of cars travelling into the CAZ would be non-compliant in 2020 if no CAZ was

¹ Department for Transport: Travel by vehicle availability, income, ethnic group, household type, mobility status and NS-SEC

APPENDIX A to CAZ Grant Mitigations M1a, M2a and M2c Cabinet Report

introduced. This is the number of people who will be impacted by CAZ charges. This proportion is applied to give an estimate on the number of individuals with an annual salary of less than £30,000 who travel into the CAZ for work in a non-compliant vehicle. The figure below graphically displays the quantification process used.



This results in a rounded total of 5,420 individuals who will be supported through this scheme. As stated previously, key workers are a priority group to be targeted by this measure. On a national scale, around 15% of the national workforce are employed as a key worker. This has been partially validated within Birmingham from data provided by the Birmingham Community Healthcare NHS Foundation Trust which showed roughly 15% of its workforce were defined as key workers. If this is applied, along with the non-compliant rate used above, (23%) to the 57,500 daily trips it results in an estimate of 1,934 key workers travelling in to the CAZ with a non-compliant vehicle. This leaves 3,486 remaining places to be allocated to low income non-key workers.

Quantification

The Mobility Credit option will be supplied via Swift²; a scheme owned and operated by TfWM providing travel cards which can be used on a number of different travel modes and with any operator that provides public transport within the West Midlands. An individual can assess the options available and decide which is most suitable for their travel needs. Any remaining credit on their account could be used on a pay-as-you-go basis or could be used to contribute towards additional travel cards in subsequent years. For context, examples of travel cards available through Swift are shown below:

- Monthly pass covering bus, train and tram usage in zones 1-5 (entirety of West Midlands) is £99/month which totals to an annual cost of **£1,188**.
- Annual combined metro and bus pass: **£1020**
- Annual pass for all buses within the network West Midlands area is **£775**
- Annual metro pass: **£800**

From this evidence, it can be concluded that £1,000 will be sufficient to cover the majority of an individual's annual public transport expenses. An additional step in the validation process will be the proof of vehicle scrappage, this is an established process and the Council do not see logistical complications in the individual providing a certificate of destruction to the council. If the individual decides to select the mobility package option then they will receive £2,000 credit on a Swift account, again very similar to the process described previously for the mobility package mitigation measure. This credit will not have an expiry date and is a sufficient amount to provide users with almost 90% of the cost of 2 years of full travel coverage ($2 \times £1,188 = £2,366$), as before users could choose different options to suit their individual needs.

² <https://www.networkwestmidlands.com/swift>

APPENDIX A to CAZ Grant Mitigations M1a, M2a and M2c Cabinet Report

Mitigation M2a – Hackney Carriage Vehicle Grant

Target Group

The distributional analysis report identified the issues faced by the majority of the Hackney carriages registered in Birmingham. These result from a change in licencing conditions coming into force in January 2020 which mandate CAZ compliant vehicles in order to be able to operate. Out of the fleet of 1280 Hackney carriage vehicles, a minimum of 1,140 vehicles will have to be replaced due to these new licensing conditions (and an extra 69 also need action but have the option to retrofit to LPG, being TX4 under 14 years old). The options that are faced by the drivers are limited and expensive. This is further complicated by current plans for a 2026 licencing condition to be introduced mandating ULEV vehicles meaning a Euro 6 Hackney carriage bought in 2020 could be operated only for 6 years.

Quantification

The Council has conducted extensive consultation with the Hackney carriage driver community and two preferential options have emerged;

- **Purchasing a second-hand vehicle and installing a retrofit solution:** This will be limited to a vehicle under 15 years of age in 2020 (Euro 4 minimum). Feedback from the driver community suggests a second-hand Euro 4 vehicle will be in the region of £12,000³ with an additional £12,500 for installation of the retrofit technology⁴ totalling £24,500 (Incl. VAT). Following the conversion of 65 Hackney carriages to LPG in 2016-17, the local community is familiar with this technology and its real-world performance.
- **Purchasing/leasing a new ULEV taxi:** There is currently only one ULEV Hackney carriage on the market with a retail price of £55,599⁵ (including VAT, accounting for the national grant). The majority of drivers have indicated they do not have access to the capital to afford this upfront payment. The manufacturer in question offers alternative forms of payment such as a personal contract purchase but as a result of the high interest rate that is used, the total amount payable can be as high as £67,744.

To help taxi drivers adapt to these new licensing conditions and to transition to compliant vehicles, the Council requested CAF funding to provide Birmingham city licensed taxi drivers with a £5,000 support package to contribute to either:

- The running costs of a new ULEV taxi, this will help the drivers in question with on-going operational payments. The items listed below, along with their expected annual costs, have been considered when assessing the correct value of the support package, these total between £9,900 - £14,900 over 4 years. From this evidence the Council believes £5,000 is an attractive offer to drivers without being excessive, covering somewhere between 33%-50% of the operational costs over 4 years. Items considered are as follows⁶:
 - Insurance: £1,300 – £1,800 pa
 - Vehicle maintenance: £200 - £500 pa
 - Taxi rank access payments (e.g. proposed annual payment to access Birmingham New Street station): Up to circa £200 pa
 - Licencing fees: £120 pa
 - Vehicle electricity costs (public and home charging): £600 - £1,000 pa
 - Home charge point (incl. installation fees and government grant): £200 -£400 one-off payment
- Retrofitting an eligible vehicle in order to reach compliance. This process has already been established by the Council with 65 vehicles being retrofitted to LPG as part of a scheme carried out in 2016-2017, funded by the Clean Vehicle Technology Fund. In this instance, a £5,000 lump sum would be provided to the driver to carry out the retrofit. The retrofit

³ Feedback from engagement with Birmingham taxi drivers. Pricing varies with mileage and condition of the vehicle, from £8,000 to £25,000 mostly, examples can be seen here [LINK](#)

⁴ <http://gascab.co.uk/gascab-explained/the-repowering-solution>

⁵ <https://www.levc.com/finance/taxi-pcp-offers/>

⁶ Sources: BCC licencing team (taxi rank and licensing fee); feedback from Hackney carriage driver community (insurance and maintenance); Element Energy estimates (electricity costs, home charging points)

APPENDIX A to CAZ Grant Mitigations M1a, M2a and M2c Cabinet Report

technology and providers will not be prescribed but will have to be on the Clean Vehicle Retrofit Accreditation Scheme list. Only the LPG conversion is in an advanced stage of being accredited as of October 2018. The £5,000 funding amount covers 42% of the estimated cost of the retrofit solution, not including the cost of purchasing an eligible TX4 vehicle. Although this still requires the driver to contribute around £7,000, the grant significantly reduces the capital outlay and this proposal has received widespread positive feedback from the hackney carriage driver community. For reference, only 69 vehicles within the current fleet will be eligible for a LPG retrofit, others must first purchase an eligible vehicle.

Mitigation M2c – Private Hire Vehicle Grant

Target Group

Private Hire Vehicle (PHV) drivers will face many of the same issues identified as impacting Hackney carriage drivers. In 2020, the proposed new licensing conditions will require PHVs to be CAZ compliant as well as enforcing an 8-year age limit. The enforcement of this age limit alone will result in 89% of the current fleet of PHVs being no longer eligible for licensing by the Council and when the emissions standards are also considered this results in only 162 vehicles out of a total stock of 4,321 (4%) being eligible for license in 2020. This leaves 4,159 vehicles which must be upgraded.

The range of vehicle choice available to PHV drivers is larger than that available to Hackney carriage drivers, and this, combined with generally cheaper vehicle prices and a larger second-hand market, means the impact of the CAZ will be less severe than that experienced by Hackney carriage drivers. However, those with non-compliant vehicles still face significant upgrade costs and there is a risk that many will no longer be able to operate as PHV drivers as a result of the licencing changes.

The impact on both Hackney carriage driver and Private Hire Vehicle drivers is exacerbated by cross-border drivers from neighbouring councils. These drivers will not be subject to the same strict emissions standards applied to Birmingham licenced drivers, this result of this is that Birmingham's drivers are made less competitive as a result of the CAZ. Government support is therefore required to ensure that these drivers can remain competitive and are not forced out of the trade.

As with Hackney carriage drivers, Private Hire Vehicle drivers predominantly reside in areas which are in the first quintile for both BAME residents and deprivation. This stresses the impact that will be felt by some of the city's most vulnerable areas and the importance of providing support to these individuals.

Quantification

Financial support will be in the form of either:

- £2,500 financial support to cover the operational expense of purchasing a ULEV that is eligible to the Plug in Car Grant⁷. This support will be paid in two annual payments in a similar format to the ULEV financial support for Hackney carriage drivers. Operational costs for PHV drivers are expected to be similar as those for hackney carriages:
 - Insurance: £1,300 – £1,800 pa
 - Vehicle maintenance: £200 - £500 pa
 - Licencing fees: £120 pa
 - Vehicle electricity costs (public and home charging): £600 - £1,000 pa
 - Home charge point (incl. installation fees and government grant): £200 -£400 one-off payment
- £2,000 contribution towards the purchase or lease of a Hybrid Electric Vehicle (HEV) or ULEV not eligible for the Plug in Car Grant (in practice, Plug-in Hybrid Electric Vehicle (PHEV)) that is CAZ compliant vehicle. This will be a cash payment to offset the purchase cost of a new or second-hand vehicle.
- £1,000 contribution towards the purchase or lease of a petrol or diesel CAZ compliant vehicle. This will include any vehicle with emissions standards equal or greater than the CAZ requirements (Euro 4 petrol/Euro 6 diesel). This measure has been added in recognition that some drivers will not be able to afford to upgrade to low emission vehicles and this allows

⁷ Vehicles with CO₂ emissions of less than 50g/km, that can travel at least 112km (70 miles) without any emissions at all.

APPENDIX A to CAZ Grant Mitigations M1a, M2a and M2c Cabinet Report

them to have as wide a choice as possible whilst still receiving support in transitioning to a new vehicle.

The funding support has been designed to maximise the air quality benefits resulting from this measure. Numerous studies have shown that the real-world driving emissions of Euro 6 diesel cars far exceed legal limits, in some extreme cases over 12 times the legal Euro 6 limit. The council therefore wishes to take advantage of the stock turnover that will result from the CAZ and incentivise vehicles which will deliver meaningful air quality benefits. To maximise the impact of this funding and to ensure the financial support will be used towards vehicles which have longevity in the stock, a condition on the maximum age of the vehicle will be set at 4 years (as of 2020). Considering the 8-year age limit, this will ensure that vehicle purchased through this funding scheme will be able to operate up to at least 2024.

As stated, the Council's preference was for this measure to be reserved for drivers upgrading to HEVs or ULEVs, however the Council is open to feedback and has added the provision for CAZ compliant traditional vehicles in response to concerns that low income drivers could be excluded from support as a result of the high capital costs of low emission vehicles. It was felt that to avoid excluding low income PHV drivers from making use of this offer due to the higher upfront costs of ULEV vehicles, diesel and petrol vehicles must be included in the eligible list of vehicles. The Council still wishes to incentivise drivers to switch to the cleanest vehicles to maximise air quality benefits and therefore are proposing a graded system which provides higher funding amounts for those who transition to ULEVs or HEVs.

The Council wants this scheme to target the most vulnerable drivers whilst also recognising that PHV operators will face large upgrade costs which could put their business in jeopardy. To ensure that the funding is not disproportionality directed to PHV operators over self-employed drivers, the council is proposing a cap on the number funding awards a single operator can receive. This initially will be set at 10 vehicles per operator, this provides substantial support in upgrading an operator's fleet but also ensures that sufficient budget will be provided to sole traders to assist in the upgrade of their vehicle.

To quantify how many funding awards should be provided the council has had to make some broad assumptions:

- All current drivers will continue to operate as Private Hire Vehicle drivers after the introduction of the CAZ.
- Those that do not own their own vehicle (short term rentals or vehicle sharing) will continue to operate in this manner but will not take responsibility for the upgrading of a non-compliant vehicle. This will be the responsibility of the vehicle owner.
- Vehicle owners who are upgrading their vehicle as a result of the new licencing conditions will make use of the funding available rather than upgrading fully at their own expense.
- A small proportion of vehicles will upgrade through natural vehicle stock turnover before this funding scheme is introduced. The age profile of the current stock is assumed to remain constant until 2020.

There are 3,649 PHV owners covering a total of 4,321 vehicles. This suggests at between 672 - 1,344 vehicles are owned as part of a fleet rather than by the individual driver of the vehicle. It also suggests the number of vehicles eligible for the funding will be 3,659 (only one fleet of 672 vehicles) to 4,321 (no fleets over 10 vehicles). Taking a conservative estimate of 4,000 eligible vehicles and applying the expected proportion of non-compliant vehicles within the PHV stock (96%), this results in 3,600 vehicles needing to be upgraded. As there is no cost or sacrifice associated with the scheme, it is assumed that all eligible Private Hire Vehicle owners will make use of this scheme, the council is therefore asking for funding to support the upgrade of 3,600 vehicles. The council has made assumptions around the uptake of each of the funding options, these are based on the current fleet of vehicles, the average cost of upgrade and the support available for each option. The assumption is that 17% of vehicle owners will opt for traditional vehicles, 60% will opt for HEVs or PHEVs and 23% will opt to upgrade to a BEV. Taking a weighted average this results in a funding award of £1,945 per vehicle which comes to a total of £7 million to support the required 3,600 vehicles.

APPENDIX A to CAZ Grant Mitigations M1a, M2a and M2c Cabinet Report

C2. Evaluation of key risks and issues

The full risks and issues register is included at the end of this FBC

A risk register can be seen in Section G2.

The risks can be broadly split in to two categories; operational risks linked to the delivery of specific mitigation schemes, and a general risk of a lack of uptake for the schemes overall. A robust application process has been developed to mitigate the risk of fraudulent activity associated with the delivery and the Council has rightly adopted a risk adverse approach in this regard.

By introducing the necessary conditions and proof of eligibility requirements to the application process, the risk of a lack of interest increases as the process appears burdensome. In order to address this issue, an effective communications strategy has been developed to clearly explain the options and attract as many people as possible who are eligible. A decision point is included as a key milestone to review the effectiveness of each scheme and allow change requests to be made to the grant award authority in good time.

C3. Other impacts of the preferred option

Describe other significant impacts, both positive and negative

As the grant funding has already been awarded for the purposes of these schemes, the greatest impact that must be considered is of not awarding the funding. This would mean that vulnerable groups identified had not been able to benefit from the packages, and would be less able to deal with the impact of the CAZ.

These schemes not only help CAZ users avoid payment, but also provide opportunities for individuals to minimise their contribution to air quality in Birmingham, and therefore the overarching goal of the Zone.

D. COMMERCIAL CASE

This considers whether realistic and commercial arrangements for the project can be made

D1. Partnership, Joint venture and accountable body working

Describe how the project will be controlled, managed and delivered if using these arrangements

Mitigations M2a and M2c require that grant funding is passed on to individual taxi drivers once the eligibility criteria has been met. In this case, there is no commercial delivery mechanism required.

Mitigation M1a requires a Grant Aid agreement with Transport for West Midlands. This is a grant award mechanism that has been utilised by the Council previously and will ensure that the grant funding is used directly for the purpose it is intended for. By establishing such an agreement, the risk of fraudulent activity (individuals using the grant for other means) can be significantly reduced as the funding will never enter their personal accounts.

Engagement with TfWM has confirmed that this is a form of agreement they would be willing to sign up to. They have also intimated that they are willing to develop a complimentary system to most effectively manage this process.

In principal, the grant agreement will enable the Council to be invoiced (or otherwise) on a monthly basis to consolidate payments to TfWM. This will significantly reduce the administrative burden of processing grant claims otherwise. Grant applicants, on the other hand, will be able to benefit from the awarded funding as soon as it is credited to their account. The agreement will also set out the regular reporting of Swift credit usage from TfWM to the Council to inform future schemes and analyse success of the scheme. This will also allow accurate quarterly reporting to JAQU in accordance with the grant award conditions to the Council.

D2. Procurement implications and Contract Strategy:

What is the proposed procurement contract strategy and route? Which Framework, or OJEU? This should generally discharge the requirement to approve a Contract Strategy (with a recommendation in the report).

There is no requirement for a contracting strategy for mitigations M2a and M2c.

There is the need to establish a Grant Agreement with TfWM as described in section D1.

APPENDIX A to CAZ Grant Mitigations M1a, M2a and M2c Cabinet Report

D3. Staffing and TUPE implications:

This project will use a mixture of City Council staff and external consultants.

There are no identified staffing or TUPE implications as the Council does not expect to enforce any redundancies.

APPENDIX A to CAZ Grant Mitigations M1a, M2a and M2c Cabinet Report

E. FINANCIAL CASE

This sets out the cost and affordability of the project

E1. Financial implications and funding

[illegible]

APPENDIX A to CAZ Grant Mitigations M1a, M2a and M2c Cabinet Report

[illegible]

E2. Evaluation and comment on financial implications:

Funding is split between capital (£9.500m) and revenue (£9.920m) as detailed above.

M1a, M2a and M2c (capital element only) are funded from CAF grant awarded by JAQU and accepted by the Council in March 2019 and as detailed above. M2c (revenue) will be funded from CAZ net revenue proceeds subject to approvals sought within this FBC.

APPENDIX A to CAZ Grant Mitigations M1a, M2a and M2c Cabinet Report

All funding is finite and grants will only be approved where funding remains available. It is anticipated that the majority of grants will be issued within the first financial year of the schemes being open which will coincide with the CAZ go-live date. In the event that funding is not exhausted within the first financial year the application process may remain open into future years, (e.g. where individuals entitled to a temporary exemption require time to decide which option is best suited to their needs, where individuals decide to keep hold of their non-compliant vehicle for as long as possible or where take up is slower than anticipated for other reasons).

It should be noted that there is no specific time limit imposed on when the funds must be utilised, however a regular quarterly report must be submitted to JAQU through which they track progress against milestones that are outlined in the grant award confirmation letters.

The application and defrayal processes identified within this FBC are designed to robustly and efficiently deliver the associated mitigation measures. However, in order to provide flexibility the recommendations in this FBC include a delegation to the Head of the Clean Air Zone, in consultation with the Cabinet Member for Transport and Environment, to adapt the process following user experience and back office team feedback, once applications are open. Any proposed changes will be taken before the programme and executive board for agreement as per the project plan below. In addition, JAQU as the grant award authority must agree any changes to the use of grant funding and for significant changes may require a formal notice of variation. The Council will act in accordance with any processes and requirements in place, noting that this process is yet to be fully defined.

Administration costs of delivering the mitigation measure were factored into the original CAZ GFBC. Initial costs will be funded from the Clean Air Fund Administration Grant of £1.918m awarded by JAQU and accepted by the Council in March 2019. Where required, any further costs to complete delivery of the package of mitigation measures will be funded as part of the operational expenses from CAZ revenue proceeds.

E3. Approach to optimism bias and provision of contingency

Optimism bias and contingency has not been considered for these schemes as the amount of grant funding is fixed.

E4. Taxation

Describe any tax implications and how they will be managed, including VAT

Grants provided to individuals or businesses as a result of these measures are not subject to VAT and there is therefore no impact for the Council.

VAT may be payable on products or services that grant funding is used to acquire, however this will be the responsibility of the recipient of the product or service.

F. PROJECT MANAGEMENT CASE

This considers how project delivery plans are robust and realistic

F1. Key Project Milestones

The summary Project Plan and milestones is attached at G1 below

Planned start date for delivery of the project

FBC Approval

Grant Schemes Testing Period

Grant Schemes Open for Application

Applications Processed and Grant Funding Awarded

Decision Point 1 (first review of schemes effectiveness)

Practical completion (payment of final grant monies)

Planned Delivery Dates

Dec 2019

Not before Jan 2020

Not before Apr 2020

Jan 2020 until complete

Not before Sept 2020

Expected July 2024

F2. Achievability

Describe how the project can be delivered given the organisational skills and capacity available

APPENDIX A to CAZ Grant Mitigations M1a, M2a and M2c Cabinet Report

The project will be delivered by the CAZ team. The Council currently has the resources and capacity to establish these schemes, with consultant support, and the recruitment process is well underway to ensure there is capacity to deal with the applications and grant awards in 2020/2021.

F3. Dependencies on other projects or activities

There is a key dependency on the JAQU vehicle checker in order to reliably ensure that applicants can check their vehicle for compliance prior to applying for funding. Without this checker, neither applicants nor the CAZ team will not have a definitive method for identifying whether a vehicle is compliant or not.

There is also a dependency on Swift system development currently in process. The CAZ team has regular updates with the Swift development team to ensure timelines are aligned for delivery.

The Council will establish a contract to deliver at least 197 Electric Vehicle (EV) charging points around the city. This will allow a much larger quantity of ULEV HCVs to operate in the city, and may have an impact on the uptake of the ULEV operating expenses grant which forms part of M2a.

F4. Officer support

Project Manager: Stephen Arnold / Will Brown

Project Accountant: John Prince

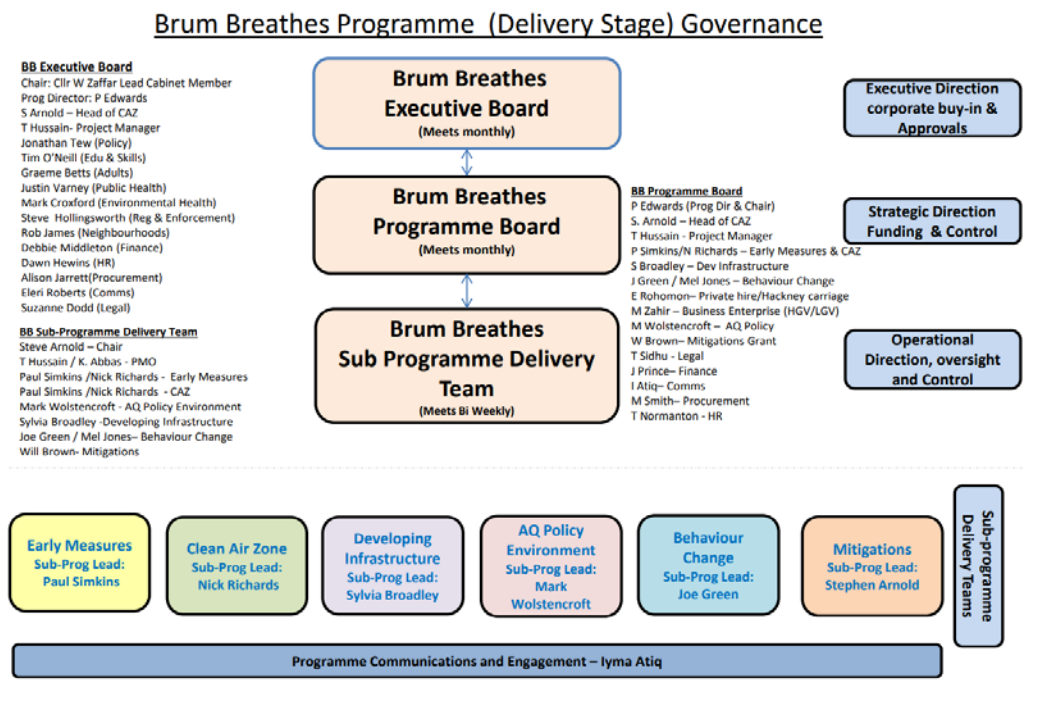
Project Sponsor: Phil Edwards

F5. Project Management

Describe how the project will be managed, including the responsible Project Board and who its members are

The grant funding will be managed and approved for release by the Head of the Clean Air Zone (or their delegate). A 'customer journey' has been developed for each of the mitigation schemes and these can be found in appendices to this document.

The project will be managed by the CAZ team, which will report regularly to the Brum Breathes Programme Board and Brum Breathes Executive Board. The project will be managed in line with the governance structure in the graphic below.



The 'Brum Breathes' programme board and subsequent Executive board are responsible for the governance, approval and reporting with regards to this project. Monthly updates and issue escalation already take place, with the option to submit papers in advance to

APPENDIX A to CAZ Grant Mitigations M1a, M2a and M2c Cabinet Report

propose decisions and recommended courses of action where required. In addition, risks and their mitigation activities are reviewed and updated.

Application and Review Process

Applications for the grant funding will be managed by the Clean Air Zone (CAZ) team which is under recruitment at the time of writing. This team will oversee the application process, validate each application on a case by case basis, and arrange for the award of grant funding once all of the necessary criteria have been reached. In addition, the team will monitor the overall uptake and utilisation of the grant funding. This will inform the communications strategy to ensure each grant is best utilised and allow decisions to be made at decision points on the topic of each scheme's structure; it is at these decision points that change requests may be produced for submittal to the grant award authority should the scheme options require significant alteration.

Each of the application and validation steps, including the criteria that must be satisfied to ensure eligibility for each grant, are outlined below.

Mitigation M1a

The application and award process for mitigation M1a is detailed in Appendix 1 which also contains an example application form. This includes the evidence required to enable the Council to determine and validate each candidate's eligibility.

The CAF report suggested that employers applied for this grant fund on behalf of their employees; the basis for this decision was that employers would be able to evidence an employee's annual earnings, as well as confirming their employment within the CAZ. It has since been established that individuals should apply themselves and it is on this basis that the application process has been designed.

It is fully incumbent upon the individual to provide suitable evidence to support their application – the Council will not be able to exercise discretion where grant funding is being awarded. Similarly, if an applicant can produce suitable documentation to validate their claim in addition to those that are specified in the application form, these may be accepted on a case by case basis.

Mitigations M2a and M2c

The application and award process for mitigation M2a is detailed in Appendix 2 and M2c in Appendix 3. The annexes also contains an example application form which includes the evidence required to enable the Council to determine and validate each candidate's eligibility. The CAF report implied that the Birmingham City Council taxi licensing team would administer the applications but this is no longer a possibility.

In addition to providing the required documentation, an applicant's details will be cross referenced with information held by the Birmingham City Council taxi licensing team. This is a significant step that must be undertaken to ensure vigilance against fraudulent applications.

Again, it is fully incumbent upon the individual to provide suitable evidence to support their application – the Council will not be able to exercise discretion where grant funding is being awarded. Similarly, if an applicant can produce suitable documentation to validate their claim in addition to those that are specified in the application form, these may be accepted on a case by case basis.

A further step that is required in the case of grants to cover running costs is the annual submittal of evidence that such running costs have been incurred. The CAF report

APPENDIX A to CAZ Grant Mitigations M1a, M2a and M2c Cabinet Report

identified that this should not be an issue for any daily PHV or HCV operators as the annual costs will exceed £1,250 annually and can be applied for over two/four years respectively.

Funding Award

The Head of Clean Air Zone will be responsible for overseeing the award of grant funding.

Where payment is to be made to TfWM it will be done in accordance with the conditions of grant aid agreement to be agreed between TfWM and the Council. Upon receipt of the necessary evidence to substantiate the retrospective grant claim payment will be made, likely on a monthly basis.

In the case of HCV and PHV operators, payment will be made using the Council's extant Voyager system. This system allows payment to individuals, sole traders and other businesses. The process is outlined below:

- Once a successful application has been made to confirm an applicant's eligibility for the grant they will be requested to complete a vendor form. The information submitted in the vendor form must have a demonstrable association with the applicant.
- The vendor form is used to create an account on the Voyager system which enables payment at a later date – this should be done well in advance of the anticipated payment date to ensure there is sufficient time to get the details entered in to the system.
- Upon receipt of evidence that demonstrates the purchase of a newer compliant vehicle or incurred running costs, payment will be made using the details captured in the vendor form.
- The Voyager system will continue to store the payment details to enable future payments.

Records of the grant funding awarded will be kept in line with the Council's and JAQUs audit requirements. JAQU are not yet able to specify their audit requirements, therefore the Council has put in place what it deems to be suitable processes and audit requirements taking in to account experience of previous and existing grant funding requirements. The Council remains in dialogue with JAQU and will work with them to ensure robust monitoring is in place.

A GDPR compliant data privacy policy will be developed in relation to each of these schemes.

Change Control

The application and defrayal processes identified within this FBC are designed to robustly and efficiently deliver the associated mitigation measures. However, in order to provide flexibility the recommendations in this FBC include a delegation to the Head of the Clean Air Zone, in consultation with the Cabinet Member for Transport and Environment, to adapt the process following user experience and back office team feedback, once applications are open. Any proposed changes will be taken before the programme and executive board for agreement.

JAQU, as the grant award authority, must agree any changes to the use of grant funding and for significant changes may require a formal notice of variation. The Council will act in accordance with any processes and requirements in place, noting that this process is yet to be fully defined.

Reporting

APPENDIX A to CAZ Grant Mitigations M1a, M2a and M2c Cabinet Report

JAQU have provided a specific quarterly report template, of which two iterations have been completed previously, that forms the basis for formal communication of progress to the grant award authority. Part of the Grant Agreement with TfWM will include regular reporting with detail at least to satisfy the requirements of JAQU.

G. SUPPORTING INFORMATION

(Please adapt or replace the formats as appropriate to the project)

G1. PROJECT PLAN

Detailed Project Plan supporting the key milestones in section F1 above

It is anticipated that approval for this FBC is granted in December 2019. This is a critical milestone to enable the mitigation grant applications to begin in early 2020 assuming the vehicle checker that JAQU are developing is available as indicated. An applications testing period is anticipated in January 2020 to test and adjust the process as and if required. This will focus on applications for the taxi (HCV and PHV) grants because there is less dependency on any other systems or programmes and the community is already engaged in discussions with the CAZ team. A full application process for all is due to commence in April 2020.

In the last quarter of 2019, the CAZ team recruitment drive will have established a number of dedicated staff to run the applications process. It is anticipated that demand for the mitigation schemes will not be consistent; the communications plan will go some way to inform individuals of their eligibility in order to initiate applications as soon as possible, though it is more likely that it is not until the CAZ charging becomes imminent that the schemes will generate significant interest.

In early 2020 it is anticipated that applications will be made online using standardised forms. Applicants will be required to upload documents to evidence their eligibility, as detailed in Appendices 1-3, in support of their applications. The forms and supporting evidence will be assessed by the CAZ team to determine eligibility and authenticity before informing each applicant that they have successfully qualified for the grant. In the case of taxi drivers, this will allow them to continue with their vehicle upgrades knowing they have the grant allocated, for CAZ workers this will initiate them scrapping a non-compliant vehicle. For both groups, there is a second engagement with the CAZ team to evidence either the ownership of a compliant vehicle or the destruction of a non-compliant vehicle before the grant funding is released.

The CAZ team role will be to monitor applications, allocate grant funds and approve, and enable the actual payment mechanisms to individuals and via the grant agreement with TfWM. Payments will be made through a finance delegate within the CAZ team.

The duration of the application window will be directly linked to the available funding; each fund will remain open for application until exhausted. In order to ensure the funds will be fully utilised, and therefore assist in the transition to compliant vehicles or alternative means of travel and contribute to improved air quality, a review of each fund will take place in September 2020. This will be Decision Point 1, and will allow an opportunity to reflect on each schemes success and attempt to forecast when each fund may be complete. This also allows the opportunity to formally request a change to a schemes structure (through the grant award body, JAQU) if it is not appealing enough to attract the required number of applications. Any later than Sept 2020 may mean a change is not approved and implemented in time to have an effect on air quality compliance by the end of 2021 deadline. Further decision points will be identified following DP1.

In the case of revenue grant funding issued over multiple payments, for example in the case of ULEV operating expenses for which M2a or M2c can be used, the CAZ team will maintain a group to check eligibility and verify operating costs on an annual basis. In this case, successful applicants will be allocated the full grant funding when they apply but will not receive it all immediately. It is conditional up evidencing suitable expenditure which is likely to require multiple engagements with the team.

APPENDIX A to CAZ Grant Mitigations M1a, M2a and M2c Cabinet Report

As detailed in the financial case, it is anticipated that the bulk of the funding will be utilised in the 2020/2021 financial year.

APPENDIX A to CAZ Grant Mitigations M1a, M2a and M2c Cabinet Report

G2. SUMMARY OF RISKS AND ISSUES REGISTER

Risks should include Optimism Bias, and risks during the development to FBC

Grading of severity and likelihood: High – Significant – Medium - Low

		Risk after mitigation:	
Risk or issue	Mitigation	Sever-ity	Like-lihood
1. M1a. TfWM may not be able to offer an account based solution which offers multiple products to Swift customers before the mitigations grant is available. This will impact the Council's ability to smoothly credit accounts on their system.	Engagement with TfWM has suggested it is possible to create new accounts to be used by TfWM Swift customers though it is a more laborious process.	Medium	Medium
2. M2a – The demand for HCV retrofits may result in a waiting period before the work can be carried out.	HCV owners who can demonstrate that they have a retrofit booked for completion with an accredited provider will be exempt from CAZ charging until the retrofit is complete.	Low	High
3. M2c – The PHV vehicle market is fairly fluid and may result in the same vehicle being used to justify funding on more than one occasion.	Grant funding is limited to one person and one corresponding vehicle.	Low	Low
4. M2a & M2c – There is a risk of fraudulent activity in relation to obtaining grant funding.	Grant funding will only be given to the Council registered HCV and PHV drivers who have been registered since 10 th Sept 2018. As the Council already holds information on this group and their vehicles, confirming eligibility can be done through the taxi licensing team. Funding will only be granted retrospectively upon receipt of confirmation of new vehicle purchase or retrofit completion.	Low	Low
5. M2a & M2c – Proactive members of the taxi community may have already upgraded their vehicle in response to the announcement of the CAZ.	Retrospective applications will be considered if made by the Council registered taxi drivers who have upgraded since 10 th Sept 2018.	Medium	Low
6. All – There may be insufficient interest in the schemes to fully utilise the grant funding.	There is a well-developed and ongoing communications strategy which will advertise the numerous options to those who may apply. In addition, change requests may be put to the grant fund awarding body in order to make the schemes more attractive, the need for a change request will be made at Decision Point 1.	Medium	Medium

APPENDIX A to CAZ Grant Mitigations M1a, M2a and M2c Cabinet Report

G3. EXTERNAL FUNDING AND OTHER FINANCIAL DETAILS

Description of external funding arrangements and conditions, and other financial details supporting the financial implications in section E1 above (if appropriate)

The table below details all of the mitigation measures and their associated grant funding that make up the mitigations measures programme. Funding for all of the mitigations listed has been confirmed in writing by JAQU. The grants pertinent to this FBC are highlighted in ***bold italics***.

Total Clean Air Fund Grant Received

Project	Scheme	Original Allocation - Total £	Current Allocation - Total £
MITIGATIONS & EXEMPTIONS (ME)			
Clean Air Fund (Capital)	Clean Air Fund (Capital)		
M1a - Mobility support for individuals	Vehicle Upgrade Support	5,420,000	5,420,000
<i>M2a - Hackney Carriage support</i>	<i>Hackney Carriage Support</i>	<i>2,500,000</i>	<i>2,500,000</i>
M2b - Council Hackney Carriage Leasing	Hackney Carriage Leasing	2,750,000	2,750,000
<i>M2c - Private Hire Vehicle upgrade</i>	<i>Private Hire Vehicle Upgrade</i>	<i>7,000,000</i>	<i>7,000,000</i>
M4 - HGV & Coach compliance fund	HGV & Coach Compliance	10,050,000	10,050,000
	Clean Air Fund (Capital)	27,720,000	27,720,000
Clean Air Fund (Revenue)	Clean Air Fund (Revenue)		
<i>M1a - Mobility support for individuals</i>	<i>Mobility Credit</i>	<i>5,420,000</i>	<i>5,420,000</i>
<i>M2a - Hackney Carriage Support</i>	<i>Hackney Carriage Support</i>	<i>2,500,000</i>	<i>2,500,000</i>
M5 - Marketing and Engagement	Marketing & Engagement	400,000	400,000
Administration Cost - CAF	Administration Cost CAF	1,917,529	1,917,529
	Clean Air Fund (Revenue)	10,237,529	10,237,529
	Total	37,957,529	37,957,529

An additional mitigation measure under M2C (private hire vehicle grant) has been identified, subject to approval within this report. This will offer support for 'plug-in' vehicle owners who have acquired vehicles following the announcement of the implementation of the CAZ. Those acquiring these vehicles will already have benefited from the governments plug-in capital grants and this mitigation will therefore focus on providing support for running costs in order to further encourage upgrades to such vehicles, funded from £2.000m CAZ net revenue proceeds. To not fund this measure would have the effect of discouraging the purchase of some of the most compliant vehicles.

The total funding is therefore £19.420m (£17.420 Clean Air Fund Grant and £2.000m CAZ net revenue proceeds), comprised of £9.920m revenue and £9.500m capital funding. This is summarised in the table, below:

Funding Requirements of this Cabinet Report and FBC

Project	Scheme	Original Allocation - Total £	Current Allocation - Total £
MITIGATIONS & EXEMPTIONS (ME)			

APPENDIX A to CAZ Grant Mitigations M1a, M2a and M2c Cabinet Report

Clean Air Fund (Capital)	Clean Air Fund (Capital)		
M2a - Hackney Carriage support	Hackney Carriage Support	2,500,000	2,500,000
M2c - Private Hire Vehicle upgrade	Private Hire Vehicle Upgrade	7,000,000	7,000,000
	Clean Air Fund (Capital)	9,500,000	9,500,000
Clean Air Fund (Revenue)	Clean Air Fund (Revenue)		
M1a - Mobility support for individuals	Mobility Credit	5,420,000	5,420,000
M2a - Hackney Carriage Support	Hackney Carriage Support	2,500,000	2,500,000
	Clean Air Fund (Revenue)	7,920,000	7,920,000
	Sub-Total	17,420,000	17,420,000
CAZ Net Proceeds (Revenue)	CAZ Net Proceeds (Revenue)		
	Private Hire Vehicle Upgrade	2,000,000	2,000,000
	CAZ Net Proceeds (Revenue)	2,000,000	2,000,000
	Grand Total	19,420,000	19,420,000

APPENDIX A to CAZ Grant Mitigations M1a, M2a and M2c Cabinet Report

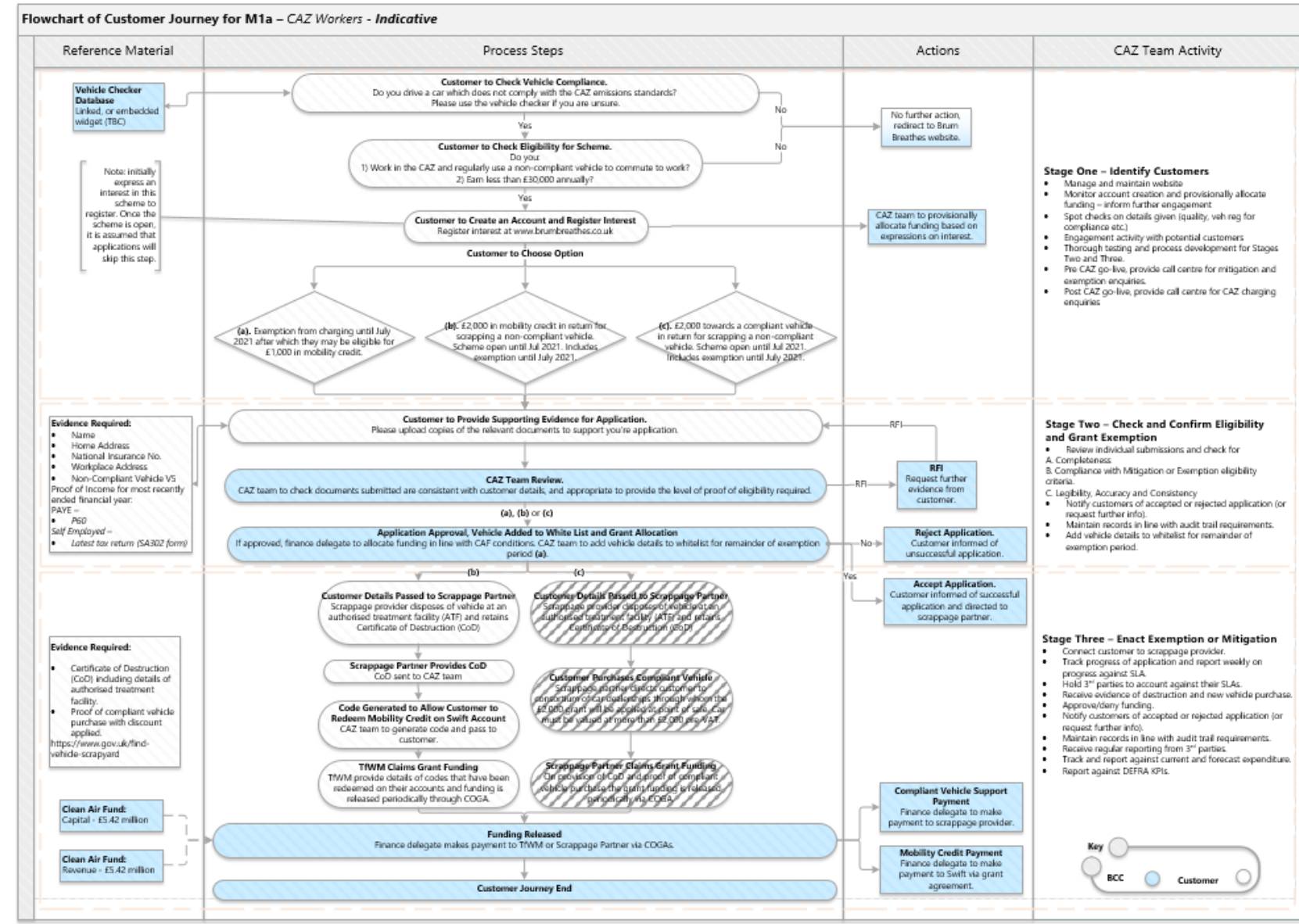
G4. STAKEHOLDER ANALYSIS		
Stakeholder	Role and significance	how stakeholder relationships will be managed
CAZ Workers	Eligible group for mitigation M1a grant.	Managed through communications strategy and engagement activities to ensure knowledge of grant funding available to them.
CAZ Businesses	Concerned over impact on their workers.	Managed through communications strategy and engagement activities to ensure knowledge of grant funding available to their workforce.
BCC HCV Taxi Community	Potential users of the rental scheme.	Managed through taxi licensing team and formal mailing of scheme details, including other grant funding opportunities specific to HCVs. Rental scheme will be managed by successful tenderers.
BCC PHV Taxi Community	Competing taxi drivers in the city.	Managed through taxi licensing team and formal mailing of scheme details, including other grant funding opportunities specific to PHVs.
JAQU	Grant awarding authority.	Managed through regular meetings and quarterly reporting on grant funding projected and actual spend.
Neighbouring Councils	Interested in success of scheme	Kept informed and may see increased applications from HCV operators who chose to move location rather than comply with updated the Council licensing conditions.
Taxi Unions	Speak on behalf of taxi community	Kept informed regularly of the scheme, have had opportunity to engage with consultations.
BCC Contact Centre	Can expect queries in relation to this scheme	Will be engaged and given details of the scheme when it is established.
BCC Taxi Licensing Team	Can expect queries in relation to this scheme	Have attended numerous workshops to develop and comment on the scheme. Will need to license the new taxis when they are purchased.

APPENDIX A to CAZ Grant Mitigations M1a, M2a and M2c Cabinet Report

Other Attachments <i>provide as appropriate</i>	
<p>Not attached but available for reference:</p> <ul style="list-style-type: none">• Clean Air Zone: Charging Order and Indicative Allocation of Net Proceeds, Cabinet Report 25th June 2019. CMIS Reference 006457/2019.• Birmingham Clean Air Zone Submission of Full Business Case and Request to Proceed with Implementation, Cabinet Report 11th December 2018. CMIS Reference 005939/2018• Tackling Air Quality in Birmingham - Clean Air Zone – Submission of Business Case to Government, Cabinet Report 10th Sept 2018. CMIS Reference 005425/2018	
<ul style="list-style-type: none">• Appendix 1 – M1a Application Process	
<ul style="list-style-type: none">• Appendix 2 – M2a Application Process	
<ul style="list-style-type: none">• Appendix 3 – M2c Application Process	

Appendix 1 – Mitigation M1a Application Process

Indicative flowchart for application and award of Mitigation M1a grant.



Appendix 1 – Mitigation M1a Application Process

Indicative application form for mitigation M1a, including the necessary documentation that must be provided to validate each application.

Part 1

This application form is strictly for individuals working within the CAZ and earned less than £30,000 in the most recently ended financial year. You must also currently be the registered keeper of a non-compliant vehicle which is used to commute to work, and have owned the vehicle since at least 10th Sept 2018.

Section 1.1 Personal Details	
Details of person listed in this application must be provided through those documents detailed in Part 2. These documents must be submitted alongside this application.	
Title:	
Fore Name/s:	
Surname:	
Date of Birth:	
Email Address:	
Telephone no.:	
National Insurance Number:	

Section 1.2 Vehicle Information	
Details of vehicle listed in this application must be provided through those documents detailed in Part 2. These documents must be submitted alongside this application.	
Registration Number:	
Make:	
Model:	
Colour:	
Date of First Registration (from V5):	

Section 1.3 Home Address	
Building Name/Number:	
Street Name:	
City:	
County:	
Post Code:	

Section 1.4 Work Address	
Details of employment listed in this application must be provided through those documents detailed in Part 2. These documents must be submitted alongside this application.	
Business Name:	
Building Name/Number:	
Street:	
City:	
County:	

Appendix 1 – Mitigation M1a Application Process

Post Code:	
------------	--

Section 1.4 Eligibility Information – Please tick all statements that apply.	
You are the registered keeper of a vehicle which is not compliant with the CAZ emissions standards.	<input type="checkbox"/>
You work within the CAZ and earn less than £30,000 annually.	<input type="checkbox"/>

Section 1.5 Scheme Selection –	
Please choose ONE option from the list below. Applications with more than one option selected will automatically be rejected.	
a. £1,000 of mobility credit for use on a SWIFT product.	<input type="checkbox"/>
b. £2,000 of mobility credit for use on a SWIFT product, in exchange for scrapping the non-compliant vehicle identified in Section 1.2.	<input type="checkbox"/>
c. £2,000 towards a compliant vehicle purchased through a BCC approved dealer, in exchange for scrapping the non-compliant vehicle identified in Section 1.2.	<input type="checkbox"/>

Section 1.6 Signature
By signing this form you certify that all of the information provided is complete and accurate to the best of your knowledge. You also agree to the BCC terms and conditions which can be found at (insert URL).
Print Name of Applicant:
Signature of Applicant:
Date of Form Submission:

Appendix 1 – Mitigation M1a Application Process

Part 2

This section specifies the documents that should be submitted alongside the application form to allow your details to be verified.

Section 2.1 Proof of Identification Checklist –

Please use this checklist to ensure the correct information is submitted to support your application. The documents you select must be attached and sent alongside this application form.

Please provide an image or copy of **ONE** of the following:

a. Current valid (signed) full EU Passport	<input type="checkbox"/>
b. Current full UK Driving Licence	<input type="checkbox"/>
c. Original birth certificate (UK birth certificate issued within 12 months of the date of birth in full form including those issued by UK authorities overseas such as Embassies High Commissions and HM Forces)	<input type="checkbox"/>
d. Current UK or EEA photo card driving licence	<input type="checkbox"/>
e. Full old-style driving licence	<input type="checkbox"/>
f. National identity card bearing a photograph of the applicant	<input type="checkbox"/>
g. Residence permit issued by the Home Office to EEA nationals on sight of own country passport	<input type="checkbox"/>

Section 2.2 Proof of Employment and Earnings Documentation –

Please ensure the correct information is submitted to support your application. The documents you select must be attached and sent alongside this application form.

You will need to provide an image or copy of one document from **both a. and b.** below.

a. Proof of employment within the CAZ:	
i) Written evidence from your employer including workplace details. This includes a company headed letter with full name and work address.	<input type="checkbox"/>
b. Demonstrate proof of income less than £30,000 annually through provision of one of the following:	
If PAYE:	
i) Your latest P60.	<input type="checkbox"/>
If self-employed:	
i) Your most recent tax return (SA302 form).	<input type="checkbox"/>

Section 2.3 Vehicle Documentation Checklist –

Please use this checklist to ensure the correct information is submitted to support your application. The document you select must be attached and sent alongside this application form.

You will need to provide an image or copy of **ONE** document from the list below:

Own Private Vehicle:	<input type="checkbox"/>
a. V5C vehicle registration certificate (logbook). (The vehicle must also be registered with the DVLA in your name and at the address you are using to apply for the residents' discount)	
Company Car:	<input type="checkbox"/>
b. A company car authorisation letter -this must be on company headed paper, state your full name, the number plate (Vehicle Registration Mark) and confirm that the vehicle is for your use only (The vehicle must be registered in the company name with the DVLA)	
Leasing Vehicle:	<input type="checkbox"/>
c. Vehicle lease document -this is the document that you signed to lease the vehicle. (The vehicle must be registered in the lease company name with the DVLA)	
A company car provided by a lease company (must provide both):	<input type="checkbox"/>

Appendix 1 – Mitigation M1a Application Process

d (i). Your company's vehicle lease document (this is the document that you signed to lease the vehicle)

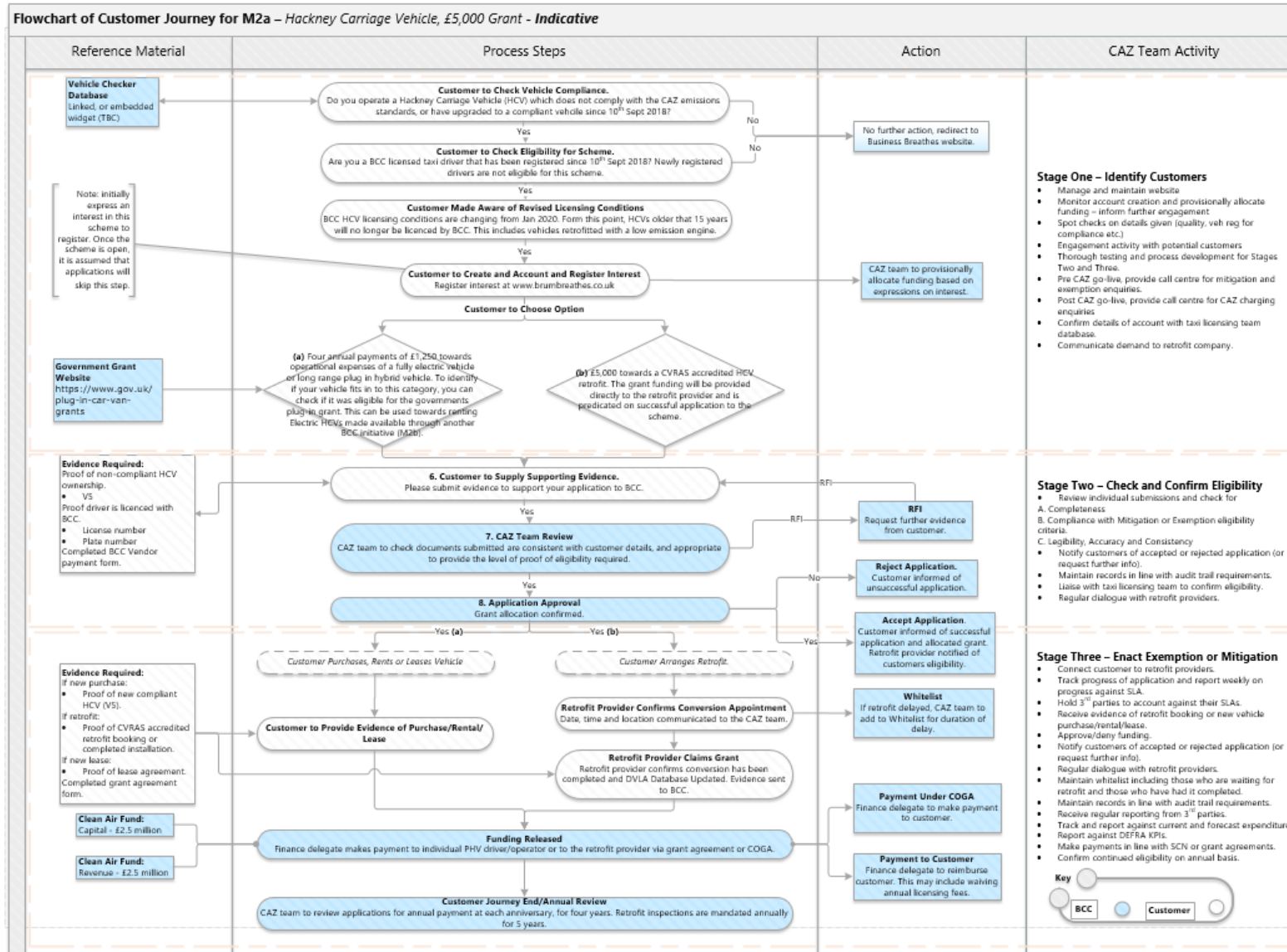


AND

d (ii). A company car authorisation letter -this must be on company headed paper, state your full name, the number plate (Vehicle Registration Mark) and confirm that the vehicle is for your use only. (The vehicle must be registered in the company or lease name with the DVLA)

Appendix 2 – Mitigation M2a Application Process

Indicative flowchart for application and award of Mitigation M2a grant.



Appendix 2 – Mitigation M2a Application Process

Indicative application form for mitigation M2a, including the necessary documentation that must be provided to validate each application.

Part 1

This application form is strictly for Hackney Carriage Vehicle (HCV) drivers who operate a non-compliant HCV and are licensed with Birmingham City Council. You must have owned a non-compliant vehicle since at least 10th Sept 2018. If you have recently upgraded your vehicle to one that is compliant, you may be eligible to benefit from the grant retrospectively.

Section 1.1 Personal Details	
Details of person listed in this application must be provided through those documents detailed in Part 2. These document must be submitted alongside this application.	
Title:	
Fore Name/s:	
Surname:	
Date of Birth:	
Email Address:	
Telephone no.:	
License Number:	

Section 1.2 Vehicle Information	
Details of vehicle listed in this application must be provided through those documents detailed in Part 2.	
Registration Number:	
Make:	
Model:	
Colour:	
Date of First Registration (from V5):	

Section 1.3 Home Address	
Building Name/Number:	
Street Name:	
City:	
County:	
Post Code:	

Section 1.4 Eligibility Information – Please tick all boxes that apply.	
I am a BCC licensed taxi driver	<input type="checkbox"/>
My vehicle complies with the BCC HCV licensing conditions	<input type="checkbox"/>
I operate a Hackney Carriage Vehicle (HCV) which does not comply with the CAZ emissions standards	<input type="checkbox"/>
I operate a Hackney Carriage Vehicle that has recently been upgraded as of 1 st September 2018, which is compliant with the CAZ emissions standard	<input type="checkbox"/>

Appendix 2 – Mitigation M2a Application Process

Section 1.5 Scheme Selection –

Please choose ONE option from the list below. Applications with more than one option selected will automatically be rejected.

Upon completion of retrofit works to non-compliant vehicle, you must notify the Council and submit evidence of the works.

a. Four annual payments of £1,250 toward operational expenses of ULEV vehicle	<input type="checkbox"/>
b. £5,000 grant upon completion of CVRAS retrofit works to a non-compliant vehicle (you must notify the Council once complete)	<input type="checkbox"/>

Section 1.6

By signing this form you certify that all of the information provided is complete and accurate to the best of your knowledge. You also agree to the BCC terms and conditions which can be found at (insert URL).

Print Name of Applicant:

Signature of Applicant:

Date of Form Submission:

Part 2

This section specifies the documents that should be submitted alongside the application form to allow your details to be verified.

Section 2.1 Proof of Identification Checklist –

Please use this checklist to ensure the correct information is submitted to support your application. The documents you select must be attached and sent with this application form.

Please provide an image or copy of **ONE** of the following:

a. Current valid (signed) full EU Passport	<input type="checkbox"/>
b. Current full UK Driving Licence	<input type="checkbox"/>
c. Original birth certificate (UK birth certificate issued within 12 months of the date of birth in full form including those issued by UK authorities overseas such as Embassies High Commissions and HM Forces)	<input type="checkbox"/>
d. Current UK or EEA photo card driving licence	<input type="checkbox"/>
e. Full old-style driving licence	<input type="checkbox"/>
f. National identity card bearing a photograph of the applicant	<input type="checkbox"/>
g. Residence permit issued by the Home Office to EEA nationals on sight of own country passport	<input type="checkbox"/>

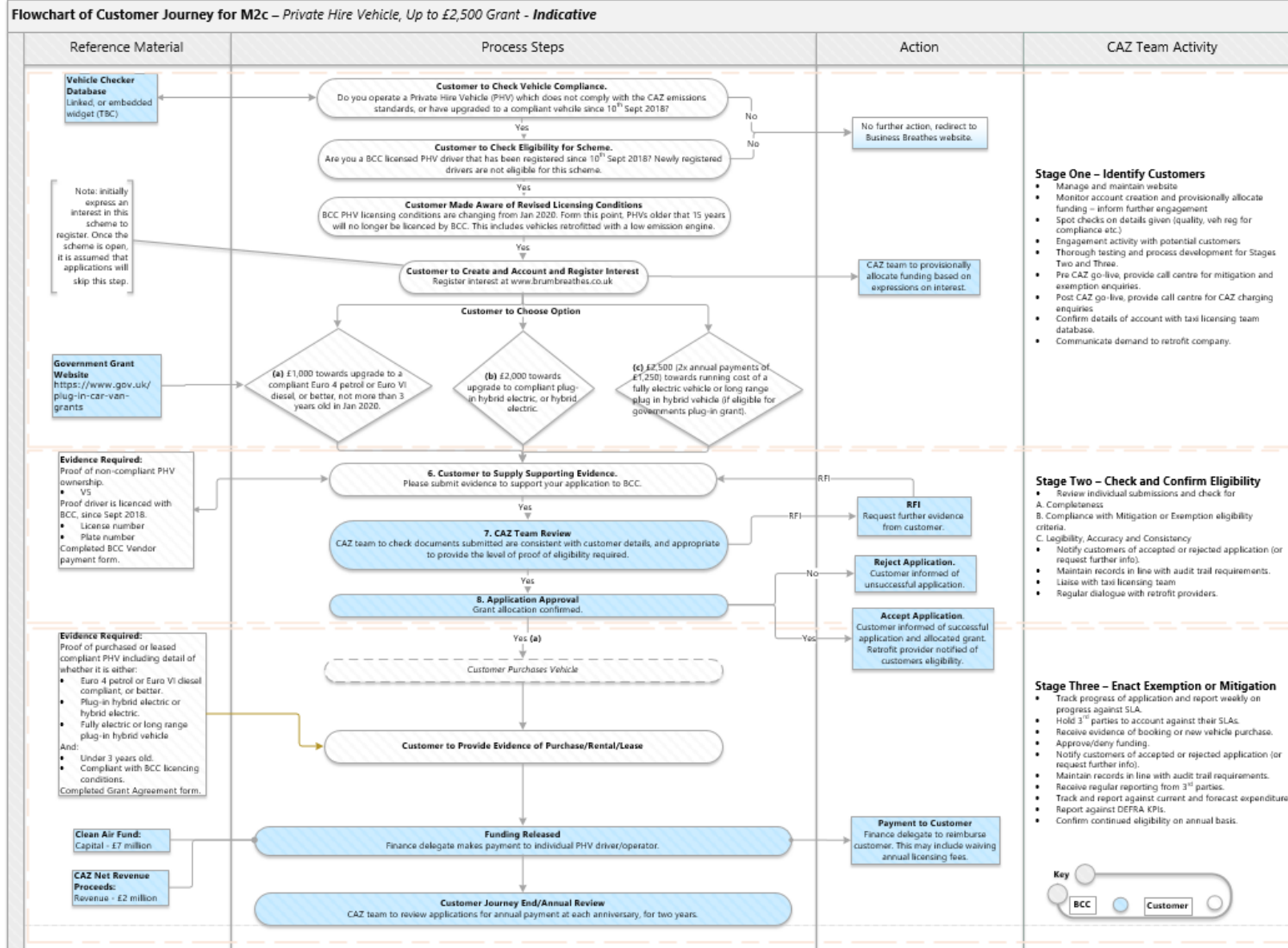
Section 2.2 Proof of Eligibility Documentation Checklist – Please use this checklist to ensure the correct information is submitted to support your application.

Please attach an image or copy of the following.

a. Demonstrate non-compliant HCV ownership through provision of one of the following:	
i) Vehicle Registration Document (V5) for a non-compliant vehicle.	<input type="checkbox"/>
b. Demonstrate proof driver is licensed with Birmingham City Council (BCC)	
i) License Number	<input type="checkbox"/>
c. If new purchase (relevant to option 5a)	
i) Proof of new compliant HCV (V5)	<input type="checkbox"/>
d. If retrofit (relevant to option 5b)	
i) Proof of CVRAS accredited retrofit booking or completed installation	<input type="checkbox"/>
e. If new lease, provide evidence of the lease agreement	<input type="checkbox"/>

Appendix 3 – Mitigation M2c Application Process

Indicative flowchart for application and award of Mitigation M2c grant.



Appendix 3 – Mitigation M2c Application Process

Indicative application form for mitigation M2c, including the necessary documentation that must be provided to validate each application.

Part 1

This application form is strictly for Private Hire Vehicle drivers who are licensed with Birmingham City Council and drive a non-compliant PHV. You must have owned the non-compliant vehicle since at least 10th Sept 2018. If you have recently upgraded your vehicle to one that is compliant, you may be eligible to benefit from the grant retrospectively.

Section 1.1 Personal Details

Details of person listed in this application must be provided through those documents detailed in Part 2. These document must be submitted alongside this application.

Title:	
Fore Name/s:	
Surname:	
Date of Birth:	
Email Address:	
Telephone no.:	
License Number:	

Section 1.2 Vehicle Information

Details of vehicle listed in this application must be provided through those documents detailed in Part 2. These documents must be submitted alongside this application.

Registration Number:	
Make:	
Model:	
Colour:	
Date of First Registration (from V5):	

Section 1.3 Home Address

Building Name/Number:	
Street Name:	
City:	
County:	
Post Code:	

Section 1.4 Eligibility Information – Please tick all boxes that apply.

I am a BCC licensed Private Hire Vehicle driver that has been registered with Birmingham City Council (BCC) since September 2018	<input type="checkbox"/>
I operate a vehicle which complies with the BCC Private Hire Vehicle licensing conditions	<input type="checkbox"/>
I operate a Private Hire Vehicle (PHV) which does NOT comply with the CAZ emissions standard	<input type="checkbox"/>

Section 1.5 Scheme Selection – Please choose ONE option from the list below. Applications with more than one option selected will automatically be rejected.

Appendix 3 – Mitigation M2c Application Process

a. £1,000 towards upgrade to a compliant Euro 4 petrol or Euro VI diesel, or better, no more than 3 years old, as of January 2020.	<input type="checkbox"/>
b. £2,000 towards upgrade to compliant plug-in hybrid electric or hybrid electric	<input type="checkbox"/>
Or, subject to purchase	
c. 2 annual payments of £2,500 towards running cost of a fully electric vehicle or long range plug-in hybrid vehicle (if eligible for government plug—in grant)	<input type="checkbox"/>

Section 1.6 Signature

By signing this form you certify that all of the information provided is complete and accurate to the best of your knowledge. You also agree to the BCC terms and conditions which can be found at (insert URL).

Print Name of Applicant:

Signature of Applicant:

Date of form submission:

Part 2

This section specifies the documents that should be submitted alongside the application form to allow your details to be verified.

Section 2.1 Proof of Identification Checklist –

Please use this checklist to ensure the correct information is submitted to support your application. The documents you select must be attached and sent with this application form.

Please provide an image or copy of **ONE** of the following:

a. Current valid (signed) full EU Passport	<input type="checkbox"/>
b. Current full UK Driving Licence	<input type="checkbox"/>
c. Original birth certificate (UK birth certificate issued within 12 months of the date of birth in full form including those issued by UK authorities overseas such as Embassies High Commissions and HM Forces)	<input type="checkbox"/>
d. Current UK or EEA photo card driving licence	<input type="checkbox"/>
e. Full old-style driving licence	<input type="checkbox"/>
f. National identity card bearing a photograph of the applicant	<input type="checkbox"/>
g. Residence permit issued by the Home Office to EEA nationals on sight of own country passport	<input type="checkbox"/>

Section 2.2 Proof of Eligibility Documentation Checklist – Please use to this checklist to ensure the correct information is submitted to support your application.

a. Demonstrate proof of non-compliant Private Hire Vehicle ownership	
i) Vehicle Registration Document (V5) for a non-compliant vehicle. The vehicle must be registered to the address provided in Section 3.	<input type="checkbox"/>
b. Demonstrate proof driver has been licensed with BCC since September 2018	
i) Copy of BCC PHV licence.	<input type="checkbox"/>