

## **Overnight Visitor Levy in England**

Consultation: <https://www.gov.uk/government/consultations/overnight-visitor-levy-in-england>

17<sup>th</sup> February 2026 - Submission by the Greater Manchester Combined Authority

### **About the Greater Manchester Combined Authority (GMCA)**

The [Greater Manchester Combined Authority](#) is a statutory entity made up of the ten GM councils and the [Mayor](#), who work with local services, businesses, communities, and other partners to ensure every part of our city region is successful. The ten councils that make up GM (Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Stockport, Tameside, Trafford, and Wigan) work together on issues that affect everyone in the region, like transport, regeneration, and attracting investment.

Our vision, underpinned by the [Greater Manchester Strategy](#), is to make Greater Manchester a thriving city region where everyone can live a good life. GMCA has forged a partnership that's stronger than the sum of its parts, spanning the public, private, voluntary, community, faith, social enterprise, and academic sectors. Greater Manchester represents the largest city region economy outside London, with a gross value added of over £100 billion. In the decade since devolution, Greater Manchester has become the [UK's fastest growing economy](#) and GM productivity is growing faster than London and the UK. We're ready to do even more in the next decade and with the right support from Government, including greater fiscal levers, we can turbocharge GM's growth and productivity.

GM has a long track record of using devolved powers effectively and transparently to deliver economic growth, public service reform, and innovation. Through [GM's Integrated Settlement](#), we are going even further to align resources with local and national priorities, and joining up in a way which makes delivery more effective. GMCA has demonstrated that when responsibilities and resources are devolved, outcomes improve for residents, businesses, and the GM economy.

There is already a form of Visitor Levy in parts of GM. In April 2023, the Manchester Accommodation Business Improvement District (ABID) established a voluntary city visitor charge where hotels and serviced apartments in Manchester and Salford charge a £1 per night additional fee to visitors. The charge pays for activity such as street cleaning, marketing campaigns that promote overnight stays out of season, and support

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to secure new conferences and sporting and cultural events. There are 79 accommodation establishments within the ABID zone that currently contribute, and the charge is overseen by the ABID board. As the first accommodation levy in England, the Manchester ABID is widely regarded as an operational success, with widespread support from the accommodation sector and very little resistance from visitors. Many destinations in England have shown interest in the approach that Manchester has taken.

The response to this consultation has been informed by engagement with local stakeholders, including industry. We will continue to engage with businesses and interested parties within the city region in developing an overnight visitor levy for Greater Manchester.

## Key points

### **1. Visitor levy powers are welcome but should be the first phase of fiscal devolution**

Giving UK Mayors and local leaders the freedom to design and implement an Overnight Visitor Levy aligns with the government's ambition of "*devolution by default*". GMCA welcomes this positive move towards fiscal devolution. This policy announcement can serve as the first step in a broader shift towards Mayoral Combined Authorities having greater control over fiscal powers. For example, GMCA is currently engaging with HM Treasury and MHCLG to explore a new Business Rates Retention Zone offer for GM. We also recognise the wider taxation ecosystem for businesses operating in the visitor economy and would advocate for more local discretion where appropriate.

### **2. Local flexibility is central to the success of this levy in Greater Manchester**

As elected leaders with a deep understanding of the local economy and the ability to better join up and integrate local approaches to deliver greater impact on growth and service outcomes, the GM Mayor and local leaders must be able to decide:

- the types of accommodation included,
- the charging model - whether it is flat rate, percentage-based or hybrid charge,
- the threshold at which accommodation providers are not liable,
- the maximum number of consecutive nights to which a levy applies,
- the ability to set rates and vary them over time,
- what the levy revenues are spent on and how funding is distributed
- the administrative model

This mirrors international practice, particularly in many city regions across continental Europe where visitor levies are routinely designed and governed locally, and in Scotland

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where councils have the flexibility to tailor the levy to their local context through rate-setting, liable accommodation types, exemptions, and use of revenues. Scottish legislation is also currently being amended to allow Scottish councils the ability to determine the charging model.

Local flexibility in the design and implementation of the levy is also particularly important in a GM context as there already exists a form of Visitor Levy in parts of GM. In April 2023, the Manchester Accommodation Business Improvement District (ABID) established a voluntary city visitor charge where 79 hotels and serviced apartments within a defined geography across Manchester and Salford charge a £1 per night additional fee to visitors. The charge pays for activity such as street cleaning, marketing campaigns that promote overnight stays out of season, and support to secure new conferences, sporting, and cultural events.

### **3. Revenue should be additional, locally retained, and locally controlled**

The levy should generate *new* funding that supports economic growth and the visitor economy, and we support the position in the Ministerial foreword to the consultation that revenues should not result in reductions to existing government funding for local authorities and should sit outside core spending power. GMCA believes that the introduction of an Overnight Visitor Levy should not replace any funding that local authorities currently receive. We also believe local leaders are best placed to determine investment priorities for Greater Manchester - for example transport, culture, destination management, and supporting services experiencing visitor driven pressures.

### **4. Effective implementation of this levy is inextricably linked to the charging model**

The consultation questions relating to both the liability and assessment model, and the administration of the overnight visitor levy, are fundamentally dependent on the design of the levy. In particular, the charging model that is used - a flat rate, percentage-based, or hybrid charge – has subsequent implications for the most effective way to collect and administer the levy.

GMCA advocates for Mayoral Combined Authorities to have the power to determine the charging model of the levy and, consequently, the assessment model and administration of the levy. Responses to the consultation questions relating to the liability and assessment model, and administration of the levy, are therefore consistent with that approach.

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## GMCA Responses to Consultation Questions

### Case for a Local Overnight Visitor Levy in England

#### Question 1 – Should this power to raise a visitor levy also be granted to Foundation Strategic Authorities?

*Not for GMCA to comment.*

### Use of Revenues

#### Question 2 – Do you agree that Mayors should be able to invest the revenues from a levy in interventions to support economic growth, including the visitor economy?

*Yes, GMCA agrees with the government position.*

Mayoral Combined Authorities are best placed to understand the visitor economy in their area and how targeted investment can support sustainable growth. In Greater Manchester, devolved decision making has enabled transformational investments in transport, culture, regeneration, and the night-time economy. Allowing Mayors to invest levy revenues in interventions that support economic growth ensures funding can be directed to high impact local priorities that sustain visitors to GM and supports the government's national priority of growth. The intention is to engage extensively with local stakeholders on the use of visitor levy revenue to support transparency and improve the offer for visitors and residents. This approach also aligns with established practice in other international cities with visitor levies.

#### Question 3 – Should a share of revenues for local authorities be allocated on the basis of the proportion of overnight stays in the authority or some other centrally defined metric, or should the distribution within the area be determined entirely by Mayors and other local leaders?

*Mayors and local leaders should be allowed to determine the distribution of revenues in their area.*

Local leaders are best placed to agree an appropriate distribution reflecting visitor pressures and economic opportunity. As one of the UK's most mature devolved regions, Greater Manchester has consistently demonstrated its ability to deliver growth, reform public services, and steward public money effectively, and we firmly believe GMCA should have the autonomy to work collectively with our 10 local authorities to determine how levy revenues should be distributed.

### Scope of the levy

#### Question 4 – Do you agree that all overnight stays in commercially let visitor accommodation should be within scope of a levy, unless otherwise

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**exempted within the national framework or by Mayors (see sections 4.3-4.5)?**

*Yes, GMCA agrees with the government position.*

We believe this forms a clear and fair starting point for the levy that will help to avoid market distortions. It should also include partial/day stays (i.e. not just overnight stays).

Under the current local taxation system many small independent accommodation providers, including AirBnB, do not contribute to the local authority revenues due to = claiming full small business rates relief, and being also being exempt from council tax, yet draw on services like waste collection and street cleaning. Therefore, GMCA is of the view that their inclusion in the Overnight Visitor Levy is vital to create a fairer taxation system.

**Question 5 – Should the government introduce a threshold below which providers are not liable for a levy? If so, what form should this take? Please provide evidence for why any suggestions should be considered.**

*Mayors and local leaders should be allowed to introduce thresholds appropriate to their regional economies.*

Thresholds need to reflect local market conditions. In some city regions, exempting micro providers could support business growth; in others, too broad an exemption could erode the levy base or create an uneven playing field. For example, the Manchester ABID currently applies to any paid accommodation establishment that falls within the Zone and that has a rateable value of £75,000. This most likely would not be appropriate for a city region such as London where the rateable values are significantly higher, reflecting the broader rental market London sits within. Local leaders are best positioned to balance administrative simplicity, fairness to small operators, and fiscal sustainability within their regional economy.

**Question 6 - Do you agree that the following exemptions should apply at a national level? Please provide details for why any additional exemptions should be considered.**

- a) Stays in registered Gypsy and Traveller sites where the accommodation is a primary residence.**
- b) Stays in charitable or non-profit accommodation provided for shelter, respite, or refuge, where the accommodation is not commercially operated.**
- c) Other types of accommodation, such as for statutory Temporary Accommodation arranged by local authorities (please provide details for why any additional exemptions should be considered).**

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*Yes, GMCA agrees with the government position.*

GMCA welcomes national exemptions being applied by accommodation type rather than on an individual visitor basis as this approach is simpler to implement. GMCA also agrees that gypsy and traveller sites, accommodation for refugees and the homeless, and statutory temporary accommodation should be exempted nationally.

**Question 7 – Do you think that Mayors and other local leaders should have the power to introduce additional local exemptions to those outlined nationally?**

**Please provide examples of specific exemptions, and evidence for these.**

*Yes, Mayors and local leaders should be allowed to introduce additional local exemptions.*

GMCA believes that Mayoral Strategic Authorities should have the flexibility over additional exemptions on accommodation type. As an example, some residents and visitors from outside our city region may travel and stay overnight in Greater Manchester to access specialist health services that are not available locally. Some NHS trusts and specialist centres provide accommodation for people receiving treatment - this may be an appropriate accommodation type to be exempted in GM, and this exemption would be within the remit of local leaders to determine.

**Levy rates**

**Question 8 – Do you agree that a levy should be set as a percentage of accommodation costs?**

*No, there should not be a national percentage fee set, and Mayors and local leaders should be allowed to decide the charging model of the levy in their area.*

Mayors and local leaders should have the power to determine the charging model for a visitor levy based on local data and local consultation. For example, there may be a balance to strike between the progressivity of a charge and simplicity for accommodation providers.

Giving Mayoral Strategic Authorities the power to determine the charging model will enable other, more appropriate charge options to be considered. The Scottish experience demonstrates clearly that a one-size-fits-all approach is unworkable: after initially restricting councils to a percentage-based levy, the Scottish Government has had to rewrite legislation to allow local authorities to choose charging models. Giving places the flexibility to tailor the levy—just as Scotland is now doing—ensures the system is fair, administratively practical, and aligned with local economic strategies .

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**Question 9 – How should a percentage-based levy be applied to inclusive packages where accommodation is only part of the total cost (for example, packages that include meals, entertainment, or transport)?**

*As above, there should not be a national percentage fee set, and Mayors and local leaders should be allowed to decide the charging model of the levy.*

**Question 10 – Do you agree that Mayors and other local leaders should have the flexibility to set levy rates locally? Please describe any factors that should be considered in setting a rate.**

*Yes, Mayors and local leaders should be allowed to set rates locally.*

Local leaders are best placed to consider economic context, market competitiveness, potential behavioural impacts, and the needs of the visitor economy. Rate setting autonomy is a hallmark of visitor levies globally and is fundamental to effective fiscal devolution.

**Question 11 – Should the government put in place a cap on the maximum tax rate? If so, at what level should a cap be set? Please provide evidence in support of your views.**

*As above, Mayors and local leaders should be allowed to determine the charging model and hence, a national cap on rates only applies if government legislates for the same charging model nationally, which GMCA disagrees with.*

**Question 12 – Should the government put in place a limit on the maximum number of consecutive nights to which a levy applies? If so, at what level should that limit be set? Please provide evidence in support of your views.**

*No, Mayors and local leaders should be allowed to decide if there is a maximum number of consecutive nights that the levy applies through analysis of local visitor data.*

Patterns of visitor stays vary widely - business travel, events, tourism, conferences etc. all have distinct profiles. Local leaders need flexibility to reflect these differences and to ensure fair treatment of accommodation types in their area. If autonomy is given to local leaders to design the levy, thorough stakeholder engagement and analysis of visitor data would inform GM's visitor levy to ensure we are responding to market need and remaining competitive as a tourist destination. GMCA would co-design the visitor levy with industry to ensure the business community's voice is heard and our city region remains competitive both nationally and internationally. Therefore, the number of consecutive nights the levy applies and the maximum tax rate would be a central part of those cost competitiveness discussions with GM accommodation providers and hospitality sector more generally.

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**Question 13 – Are there any other flexibilities or safeguards that should be built into the rate-setting framework?**

*As above, Mayors and local leaders should have the flexibility to build in additional safeguards that are relevant for their local context.*

**Question 14 – Should Mayors and other local leaders have powers to vary the rate for different types of accommodation, including short term lets?**

*Yes, Mayors and local leaders should be allowed to vary the rate for different accommodation types.*

Different accommodation types generate different levels of demand on local services. For example, short term lets may create more intensive impacts on neighbourhoods compared to city centre hotels. Varying rates enables local leaders to design a levy that is equitable, transparent, and responsive to local market conditions.

**Question 15 – Do you agree that Mayors should have the flexibility to decide whether the levy applies to different constituent authorities within their region?**

*Yes, Mayors and local leaders should have the flexibility to determine collectively in which local authorities the levy will apply.*

Within a combined authority area, visitor activity is not evenly distributed. For example, in Greater Manchester, Manchester city centre hosts a significant majority of overnight stays, while other local authorities may have lower activity or specific local considerations.

Local flexibility allows the levy to potentially reflect the geography of visitor demand and local political consensus. GMCA advocates for Leaders and the Mayor in GM, as part of the normal GMCA processes, to decide if a levy is applied to all of GM or only to parts, and, equally, we advocate for a collective GM decision around how the revenue is spent.

**Question 16 – Should Mayors and other local leaders be able to vary levy rates in their areas based on, for example, seasonality? Please provide details of any other flexibilities that should be considered.**

*Yes, Mayors and local leaders should be allowed to vary the levy rate based on certain factors.*

Seasonality is an important feature of many visitor economies. Enabling seasonal variations supports demand management, encourages off-peak tourism, and helps avoid disproportionate impacts on providers during quieter periods. This approach aligns with international best practice.

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## Transparency and Accountability

**Question 17 – Do you agree that a formal consultation process conducted by Mayors and, if powers are extended to them, Foundation Strategic Authorities should be required before a levy is introduced and that this approach is proportionate?**

*Yes, GMCA agrees with the government position that, before a levy is introduced, a formal consultation should be conducted.*

**Question 18 – Do you agree with the proposed components of the prospectus?**

*Yes, GMCA agrees with the government position.*

**Question 19 – Do you think that the proposed length of the notice period of 12 months is appropriate?**

*Government should evaluate what minimum notice period is required, balancing giving businesses time to prepare versus ensuring MSAs can go live with the levy by April 2028*

GMCA recognises the balance between timely implementation and providing businesses adequate preparation time, and we welcome providing certainty in the form of a notice period to give accommodation providers time to adjust to this new levy. GMCA has already begun engaging with regional stakeholders to make them aware of this new visitor levy power for MSAs and discuss effective implementation of the levy. However, a minimum notice period of 12 months may be too long given the primary and secondary legislation, and the regional consultation period, which will be required before the levy can go live.

**Question 20 – Do you agree that introduction of a levy, and any subsequent changes to the core elements of a levy, should be subject to the relevant statutory Mayoral budget voting process in MSAs?**

*Yes, GMCA agrees with the government position, and it is worth noting that the introduction of any GM Overnight Visitor Levy, and any subsequent changes, would also involve continual engagement with local stakeholders.*

**Question 21 – If Foundation Strategic Authorities have powers to introduce a visitor levy, do you agree that a simple majority council vote should be required ahead of consultation on a levy, ahead of implementation and this be repeated ahead of any changes to the core elements of a levy? Is this approach fair and proportionate?**

*Not for GMCA to comment.*

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**Question 22 – If Foundation Strategic Authorities have powers to introduce a visitor levy, what are your views on the consent mechanism in Foundation Strategic Authorities where a levy is applied to a smaller area within the Foundation Strategic Authorities’ geography?**

*Not for GMCA to comment.*

**Question 23 – What further or different governance and accountability mechanisms are needed in Foundation Strategic Authorities, Mayoral Strategic Authorities or the Greater London Authority?**

*The design and implementation of a GM overnight visitor levy would be embedded within GMCA’s well-established existing governance processes, covering both the levy’s operation and investments from the levy revenues. Any further or different governance mechanisms would be determined by GMCA as appropriate.*

**Question 24 – Do you agree with the proposed approach to reporting, and should any further accountability mechanisms be considered?**

*Yes, GMCA agrees with the government position.*

#### **Liability and Assessment model**

**Question 25 – Do you agree that it should be the visitor accommodation provider that is ultimately liable?**

*Yes, agree with the government position.*

The party liable would have the legal duty to collect payment of the tax and return it to the relevant tax authority. The legal liability sitting with the accommodation provider is logical as they know best how many visitors are staying overnight in their accommodation.

**Question 26 – How could digital booking platforms or intermediaries best be integrated to streamline levy assessment, collection and tax returns?**

*As above, this question is pertinent for a percentage charge as it is important in this approach when the charge is applied and if it includes the commission that third-parties charge for calculating the accommodation cost that the levy is applied to, but this is not the case for other charging models.*

**Question 27 – Do you agree that a self-assessed model is the most appropriate approach for administering a visitor levy?**

*As above, it depends on the charging model of the levy.*

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**Question 28 – Do you agree that the tax point of a levy should be the point of arrival?**

*Yes, GMCA agrees with the government position. The point of arrival is the most sensible tax point regardless of which charging model is applied.*

**Administration**

**Question 29 – In your view, should levies be administered locally by relevant authorities, through a centralised approach, or a combination of local and central authorities?**

*GMCA's view is this depends on the approach the government takes to legislating the levy.*

If Mayors and local leaders are given the power to determine the charging model, then administering the levy locally by the relevant authority would be the best approach as approaches will differ between regions and the local context becomes more of a factor. Local authorities already collect business rates and council tax. The levy could be raised as an addition to the business rates payment system and paid to the relevant authority. However, if the government is to apply a percentage charge nationally, then a more centralised approach with HMRC playing a role could be more appropriate as it may be more efficient and make enforcement easier. The levy could be collected and repatriated as part of the VAT system via HMRC.

**Question 30 – Do you agree a portion of levy revenues should be retained by the relevant authorities to fund administration costs, if levies are administered locally?**

*Yes, GMCA agrees with the government position that a portion of levy revenues should be retained by either the combined authority or local authorities to fund administration costs if levies are administered locally.*

**Question 31 – Should the registration process for accommodation providers to support the administration of the visitor levy be operated locally or nationally alongside the registration scheme for short-term lets in England?**

*GMCA would welcome a national registration process for accommodation providers that sits alongside the registration scheme for short-term lets.*

Regardless of which charging model for levy is applied, this would be the most efficient option because it ensures consistency, reduces duplication, and leverages the existing short-term- lets registration framework. It also keeps the process simple for accommodation providers while still giving regions full control over levy rates and enforcement.

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**Question 32 – What processes or solutions for collecting revenues could be introduced to minimise the burden on businesses?**

*As above, this depends on the charging model that is applied.*

An example of an alternative model of collection that minimises the administrative burden on businesses is the model that has been adopted by the Manchester ABID. The charge is collected by a representative organisation on the ABID Board, City Co. The amount due from accommodation providers in the ABID zone, charging £1 per night additional to visitors, is estimated monthly based on the number of rooms and average occupancy for each accommodation provider using historical occupancy data. This approach means that accommodation providers sometimes have to pay an estimated monthly amount higher than their actual visitor numbers or occasionally having a lower charge due to higher-than-estimated visitor numbers. This solution, however, is not possible with a percentage charge approach where a self-assessment model would most likely need to be used.

**Question 33 – What further support could reduce the administrative burden on businesses in collecting and remitting a levy?**

*As above, this depends on the charging model that is applied.*

A percentage-based levy puts an increased administrative burden on businesses and some form of reimbursement to businesses for the administrative costs should be considered if the percentage charge is applied nationally.

**Compliance and Enforcement**

**Question 34 – Tax authorities will require enforcement powers to ensure compliance with a levy. Do you agree with the powers listed?**

- Civil information and inspection powers
- Civil powers to charge interest and penalties
- Discretionary debt relief powers

*Yes, GMCA agrees with the government position.*

**Question 35 – Do you agree that an appeals process should enable providers to appeal on the basis of liability, classification or enforcement action? Please provide details of any additional areas which should be considered.**

*Yes, GMCA agrees with the government position.*

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## Equalities

### **Question 36 – Do you have any views on the potential impacts of the proposals in this consultation on persons who share a protected characteristic?**

*As far as GMCA is aware, there are no equalities impacts on persons who share protected characteristics from the introduction of an overnight visitor levy. If a visitor levy is to be introduced in GM, then a full Equalities Impact Assessment would be undertaken, in line with our Greater Manchester Strategy.*

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