

**Manchester City Council
Report for Information**

Report to: Environment, Climate Change and Neighbourhoods Scrutiny Committee – 11 January 2024

Subject: Greater Manchester Clean Air Plan Update

Report of: Strategic Director, Growth & Development

Summary

To receive a report that provides the Committee with information on the Greater Manchester Clean Air Plan (GM CAP) as submitted to the Joint Air Quality Unit (JAQU) for consideration, December 2023.

Recommendations

The Committee is asked to note the latest position on the development of an investment-led Clean Air Plan for Greater Manchester.

Wards Affected: All

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| Environmental Impact Assessment -the impact of the issues addressed in this report on achieving the zero-carbon target for the city | The GM CAP is a place-based solution to tackle roadside NO ₂ emissions which will have a positive impact on reducing carbon. |
| Equality, Diversity and Inclusion - the impact of the issues addressed in this report in meeting our Public Sector Equality Duty and broader equality commitments | The EQIA assessment undertaken following consultation concluded that improved air quality resulting from the GM CAP will have a disproportionate benefit for many protected characteristic groups namely, pregnancy and maternity; older people, young people and children; those with disability or ill-health; and those from minority ethnic and faith groups who are more likely to live in deprived neighbourhoods. A full EQIA will be undertaken at full business case development following the results from the JAQU review. |
| Manchester Strategy outcomes | Summary of how this report aligns to the Our Manchester Strategy/Contribution to the Strategy |

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| A thriving and sustainable city: supporting a diverse and distinctive economy that creates jobs and opportunities | The Clean Air Plan aims to improve air quality across Greater Manchester. By doing so the city will become a more attractive place to live, work and visit and this in turn is likely to lead to a stronger economy. |
| A highly skilled city: world class and home grown talent sustaining the city's economic success | A city with improved air quality is likely to be more successful at retaining and attracting talent |
| A progressive and equitable city: making a positive contribution by unlocking the potential of our communities | Ensuring that residents can access job opportunities and other facilities in a safe and clean environment, will enable everyone to contribute to the success of the city. |
| A liveable and low carbon city: a destination of choice to live, visit, work | Reducing congestion and air pollution will improve perceptions of the city, and help to tackle greenhouse gas emissions |
| A connected city: world class infrastructure and connectivity to drive growth | Investing in and maintaining the city's transport infrastructure will help to drive growth. |

Implications for:

- Equal Opportunities Policy
- Risk Management
- Legal Considerations

Can be found in the background information (AQAC report) and will be updated following JAQU review of our submission.

Financial Consequences – Revenue

None as a result of this report.

Financial Consequences – Capital

None as a result of this report.

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Background documents (available for public inspection):

The following documents disclose important facts on which the report is based and have been relied upon in preparing the report. Copies of the background documents are available up to 4 years after the date of the meeting. If you would like a copy, please contact one of the contact officers above.

In addition, the submission to JAQU, including Equalities Impacts and technical details, are now published and available at <https://cleanairgm.com/clean-air-plan/>

- 13 July 2023, Report to AQAC: GM Clean Air Plan – July 2023 Update
- 27 February 2023, Report to AQAC: GM Clean Air Plan – February 2023 Update
- 26 October 2022, Report to AQAC: GM Clean Air Plan – Expenditure Update
- 26 October 2022, Report to AQAC: GM Clean Air Plan – October 2022 Update
- 17 August 2022, Report to AQAC: GM Clean Air Plan – August 2022 Update
- 1 July 2022, Report to AQAC: GM Clean Air Plan – July 22 Update
- 23 March 2022, Report to AQAC: GM Clean Air Plan – March 22 Update
- 28 February 2022, Report to AQAC: GM Clean Air Plan – February 22 Update
- 2 February 2022, report to CACC: GM Clean Air Plan – update to the temporary exemption qualification date for GM-licensed hackney carriages and private hire vehicles
- 20 January 2022, report to AQAC: GM Clean Air Plan – A628/A57, Tameside – Trunk Road Charging Scheme update
- 20 January 2022, report to AQAC: GM Clean Air Plan – Financial Support Scheme Jan 22 Update
- 20 January 2022, report to AQAC: GM Clean Air Plan – Clean Air Zone Discount & Exemptions Applications
- 18 November 2021, report to AQAC: GM Clean Air Plan – GM Clean Air Funds assessment mechanism
- 18 November 2021, report to CACC: GM Clean Air Plan – GM Clean Air Plan Policy updates
- 13 October 2021, report to AQAC: GM Clean Air Plan – Operational Agreement for the Central Clean Air Service
- 13 October 2021, report to CACC: GM Clean Air Plan – Showmen’s Vehicle Exemption
- 13 October 2021, report to CACC: GM Clean Air Plan – Clean Air Zone daily charge refund policy
- 13 October 2021, report to CACC: GM Clean Air Plan – A628/A57, Tameside – Trunk Road Charging Scheme
- 21 September, report to AQAC: GM Clean Air Plan – Clean Air Zone: Camera and Sign Installation
- 21 September, report to AQAC: GM Clean Air Plan – Bus Replacement Funds
- 25 June 2021, report to GMCA: GM Clean Air Final Plan
- 31 January 2021, report to GMCA: GM Clean Air Plan: Consultation
- 31 July 2020, report to GMCA: Clean Air Plan Update
- 29 May 2020, report to GMCA: Clean Air Plan Update
- 31 January 2020, report to GMCA: Clean Air Plan Update
- 26 July 2019, report to GMCA: Clean Air Plan Update

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

1.0 Introduction

- 1.1 The Government has instructed many local authorities across the UK to take quick action to reduce harmful roadside levels of Nitrogen Dioxide (NO₂). In 2017 the Secretary of State (SoS) for Environment, Food and Rural Affairs issued Directions under the Environment Act 1995 requiring local authorities to undertake feasibility studies to identify measures for reducing NO₂ concentrations to within legal limit values in the “shortest possible time”. In Greater Manchester, the 10 local authorities, the Greater Manchester Combined Authority (GMCA) and Transport for Greater Manchester (TfGM) are working together to develop a Clean Air Plan to tackle NO₂ exceedances at the roadside.
- 1.2 The development of the GM CAP is funded by government and is overseen by Joint Air Quality Unit (JAQU), the joint Department for Environment, Food & Rural Affairs (DEFRA) and Department for Transport (DfT) unit established to deliver national plans to improve air quality and meet legal limits. The costs related to the business case, implementation and operation of the GM CAP are either directly funded or underwritten by government acting through JAQU and any net deficit over the life of the GM CAP will be covered by the New Burdens Doctrine, subject to a reasonableness test¹.
- 1.3 The 10 GM local authorities are committed to delivering an investment-led, non-charging GM Clean Air Plan.

2.0 Background

- 2.1 The GMCA – Clean Air Final Plan report on 25 June 2021 endorsed Greater Manchester’s final CAP and policy following a review of all of the information gathered through the GM CAP consultation and wider data, evidence and modelling work. Throughout the development of the previous Plan, JAQU reviewed and approved all technical and delivery submissions. The Plan was agreed by the ten Greater Manchester local authorities. Within this document, this is referred to as the Previous GM CAP.
- 2.2 On the 8th February 2022, a new direction (the Direction) was issued by the SoS² which confirmed that the March 2020 Direction to implement a Class C charging Clean Air Zone (CAZ) had been revoked and required that a new plan be submitted to the SoS by 1st July 2022 the GM authorities should:
 - review the measures specified in the local plan for NO₂ compliance and associated mitigation measures; and
 - determine whether to propose any changes to the detailed design of those measures, or any additional measures.

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

² [The Environment Act 1995 \(Greater Manchester\) Air Quality Direction 2022 \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)

- 2.3 The Direction also states that the local plan for NO₂ compliance, with any proposed changes, must ensure the achievement of NO₂ compliance in the shortest possible time and by 2026 at the latest. It should also ensure that human exposure to concentrations of NO₂ above the legal limit is reduced as quickly as possible.
- 2.4 In July 2022, the 'Case for a new Greater Manchester Clean Air Plan'³ was submitted to the Secretary of State. It set out that challenging economic conditions, rising vehicle prices and ongoing pandemic impacts meant that the original plan of a city-region charging CAZ was no longer the right solution to achieve compliance, instead proposing an investment-led, non-charging GM CAP.
- 2.5 The primary focus of the 'Case for a new Greater Manchester Clean Air Plan' was to identify a plan to achieve compliance with the legal limit value for NO₂ in a way that considered the cost-of-living crisis and associated economic challenge faced by businesses and residents. This would be achieved through an investment-led approach combined with all the wider measures that GM is implementing with the aim of reducing NO₂ emissions to within legal limits, in the shortest possible time, and at the latest by 2026.
- 2.6 The 'Case for a new Greater Manchester Clean Air Plan' proposed using the £123m of Clean Air funding that the Government has awarded to the GM authorities to deliver an investment-led approach to invest in vehicle upgrades, rather than imposing daily charges, and deliver new Zero Emission Buses (ZEBs) as part of the Bee Network (a London-style integrated transport network for Greater Manchester). The new plan would ensure that the reduction of harmful emissions would be at the centre of GM's wider objectives. Within this document, this plan is referred to as the 'New GM CAP'.
- 2.7 Having submitted the Case for a New Clean Air Plan in July 2022 GM was asked by Government in January 2023 to:
- (i) provide modelling results for a benchmark CAZ to address the persistent exceedances identified in central Manchester and Salford, for these to be compared against your proposals.*
 - (ii) Identify a suitable approach to address persistent exceedances identified in your data on the A58 Bolton Road in Bury in 2025, and to propose a suitable benchmark.*
 - (iii) Set out how the measures you have proposed will be modelled and evidenced overall, and to ensure that they are modelled without any unnecessary delay.*

- 2.8 Greater Manchester Authorities have been undertaking the work required to supply this further evidence and on 8 March 2023 submitted the first element, 'Approach to Address Persistent Exceedances Identified on the A58 Bolton Road, Bury'⁴.
- 2.9 In April 2023, the Government advised TfGM to pause any new spending on bus retrofit as it had evidence that retrofitted buses have poor and highly variable performance in real-world conditions.
- 2.10 In the light of the Government's new evidence, JAQU issued revised general guidance to authorities producing Clean Air Plans nationwide requiring that air quality modelling should no longer assume any air quality benefits from a retrofitted bus. The Government also advised that it anticipated a six-month focused research programme to quickly investigate the causes of poor bus retrofit performance and how it could be improved would be reported in Autumn 2023.
- 2.11 To date the outputs of this study have not been made available to GM and in the absence of the Government's bus retrofit study, GM has incorporated the revised guidance from JAQU. The guidance requires that air quality modelling should no longer assume any air quality benefits from a retrofitted bus into the modelling which underpins the development of its Clean Air Plan and to produce a report that appraises the ability of the Investment-led Plan and a benchmark CAZ to deliver compliance with the legal limit value in the shortest possible time and by no later than 2026.

3.0 Main issues

- 3.1 This report provides the Scrutiny Committee with an update on the development of an investment-led Clean Air Plan for Greater Manchester.
- 3.2 The report "GM Clean Air Plan – December 2023 Update", attached as Appendix One, was considered by the GM Clean Air Scrutiny Committee on 18th December 2023 and the GM Air Quality Administration Committee on 20th December 2023. The report provides an update on the Case for a new Greater Manchester Clean Air Plan and confirms that an appraisal of GM's proposed investment-led plan has been undertaken against a benchmark charging Clean Air Zone (CAZ) in the centre of Manchester and Salford.
- 3.3 Using the Government's updated technical guidance, that 'no air quality benefit' should be assumed from bus retrofit, GM now has evidence to show that its investment-led, non-charging Clean Air Plan can deliver compliance with the Government direction to bring nitrogen dioxide levels within legal limits in 2025.

⁴ <https://democracy.greatermanchester-ca.gov.uk/documents/s24939/Appendix%203.%20GM%20CAP%20A58%20Bury%20Measure%20Report%20DRAFT%20for%20AQAC%20Approval%20Feb%202023.pdf>

- 3.4 Modelling predicts if GM did nothing there would be twelve exceedances of nitrogen dioxide in 2025. The majority of these would be in the regional centre – Manchester and Salford.
- 3.5 GM's investment-led plan proposes using £86.7m Clean Air funding already awarded for investment in zero-emission buses, taxi, and private hire upgrades (through a Clean Taxi Fund) and measures to manage traffic flows on some roads in the centre of Manchester and Salford.
- 3.6 Modelling shows GM's investment-led plan can achieve compliance in 2025 and that compliance is not achieved in 2025 or 2026 by a benchmarked category C charging CAZ.

4.0 The Investment Led Plan

- 4.1 The Investment-led Plan targets action at the 12 exceedance sites predicted in 2025.
- 4.2 In the light of the government's new evidence on bus retrofit and having incorporated the revised guidance from JAQU into GM's modelling, it has been determined that targeted investment in zero-emission buses and taxis would provide the most effective means to achieve compliance under an investment-led scenario. This will be supplemented by local highway-based measures at known persistent exceedance locations at Regent Road and around Quay Street.
- 4.3 **Bus investment** represents the most important mechanism for reducing exceedances under the Investment-led Plan and is grounded in the ability of TfGM to operate a bus franchising scheme. TfGM is responsible for operating bus franchising on behalf of the GMCA and has the authority to manage franchise agreements in respect of local services, including the specification of fleet requirements and deployment.
- 4.4 The Investment-led Plan involves bus investment of £51.2 million, comprising:
- £39.7 million to purchase 64 ZEBs; and
 - £11.5 million for the electrification required on Piccadilly Approach, and at Bolton, Queens Road and Middleton depots.
- 4.5 **Taxi measures** represent an important mechanism for reducing exceedances under the Investment-led Plan and are grounded in the ability of the GM authorities to reduce emissions through licensing conditions.

- 4.6 The appraisal of the Investment-led Plan has been developed on the basis that an emissions standard, requiring licensed hackneys and PHVs to be a minimum of Euro 6 (diesel) or Euro 4 (petrol) by 31st December 2025, will have been adopted by all GM Authorities. A transitional start date for the implementation of emission standards by the 1st January 2025 is assumed and, recognising that taxi licensing renewals occur annually across the calendar year, it is assumed that the end transition date for the implementation of emission standards across the 10 local authorities will be the 31st December 2025.
- 4.7 The current licensed vehicle emissions policies in Manchester are:
- New vehicle licence applications require an emissions compliant vehicle to be attached to the licence (effective since January 2022)
 - Existing vehicle licences have until 1 April 2026 to replace their non-emissions compliant vehicle with a compliant vehicle.
- 4.8 Therefore this would require the Licensing and Appeals Committee to consider amending the transition date on the currently policy by 3 months. A report is being prepared for the Committee's consideration.
- 4.9 The Clean Taxi Fund proposed under the investment led Plan would provide a grant for every eligible taxi and private hire vehicle licensed with a GM authority as of 20 December 2023; the fund totals £30.5m.
- 4.10 By 2026, it is therefore assumed that 100% of the GM taxi fleet will be compliant with the emission standards. It is intended that the Clean Taxi Fund will support this by opening before 2025 enabling earlier upgrades and helping to mitigate against the risk of taxis re-licensing with another authority that does not have the same emission standard.
- 4.11 **Targeted Local Traffic Management Measures** – a series of targeted local traffic management measures are proposed to reduce NO2 exceedance concentrations at Regent Road (Salford) and Quay Street (Manchester) sites.
- 4.12 The package of targeted local measures can be summarised into a series of three schemes:

Signal optimisation at A57 Regent Road and adjacent parallel routes

- Signal timing adjustment to A57 Regent Road green times applied at the junctions of A57 Regent Road / Oldfield Road and M602 J3 West arm approach to the junction. Supplementary adjustments are to be applied to parallel routes, namely: Oldfield Road / Middlewood Street, Ordsall Lane / Middlewood Street / Hampson Street and Hampson Street / Trinity Way. These adjustments will improve the flow of traffic to reduce the level of congestion and therefore improve emissions.

Speed restrictions on A57 Regent Road

- Implementation of a speed reduction from 40mph to 30mph on A57 Regent Road between Oldfield Road and M602. By implementing these speed reductions, traffic flow will become steadier as a result of reducing unnecessary accelerations and decelerations, leading to a reduction of emissions.

Measures to reduce through traffic in the wider A34 Quay Street area

- Implementing measures to reduce through traffic on Gartside Street, Lower Byrom Street, Great John Street and Atherton Street will reduce through and turning traffic on Quay Street. The measures may differ by location, but are likely to include signing, surface treatments and urban realm improvements. The aim of this measure is to perceive these roads as low speed and low capacity and therefore avoid them unless necessary.

- 4.13 GM have been working to understand how compliance can be reached on the A34 Quay Street and the roads that feed onto the A34 Quay Street. Modelling on this section has shown achieving a maximum 10 mph flow on local roads feeding into A34 Quay Street to be an effective means of reducing traffic volumes on adjacent routes and therefore delivering air quality benefits on Quay Street and delivering compliance at this exceedance site. Viability of achieving the modelled 10mph speed limit is being explored by Manchester City Council.
- 4.14 Proposed schemes, which are subject to public consultation, could involve a combination of speed management, streetscene (homezone) improvements and traffic management measures on local roads feeding into the A34 Quay Street to reduce the flow on this road. The roads under consideration include Gartside Street, Lower Byrom Street, Great John Street and Atherton Street.
- 4.15 The modelled air quality impact of the package of measures including bus, taxi and targeted local traffic management measures outlined above shows that the Investment-led Plan achieves compliance at these locations and therefore reduces the number of exceedances from 12 in 2025 to 0.
- 4.16 However, it is for Government to determine what measures GM is to implement – only the Investment-led Plan complies with the requirement placed on the 10 GM local authorities to deliver compliance in the shortest possible time and by 2026 at the latest.
- 4.17 A verbal update on the considerations of both committees will be provided at the meeting.

5.0 Recommendations

- 5.1 The Committee is asked to note the latest position on the development of an investment-led Clean Air Plan for Greater Manchester.