

GREATER MANCHESTER COMBINED AUTHORITY

DATE: Friday, 31st January, 2025

TIME: 10.30 am

VENUE: Council Chamber, Stockport Town Hall, Edward Street,
SK1 3XE

SUPPLEMENTAL AGENDA

- 9. GMCA Audit Committee - 22 January 2025** 1 - 14

To note the minutes of the GMCA Audit Committee held on 22 January 2025.

- 14. GM Clean Air Plan - January 2025 Update** 15 - 28

Report of Andy Burnham, Mayor of Greater Manchester.

Name	Organisation	Political Party
Councillor Eleanor Wills	Tameside MBC	Labour
GM Mayor Andy Burnham	GMCA	Labour
Councillor Arooj Shah	Oldham Council	Labour
Councillor Tom Ross	Trafford	Labour
Councillor Mark Hunter	Stockport	Liberal Democrats
Councillor Neil Emmott	Rochdale	Labour

BOLTON	MANCHESTER	ROCHDALE	STOCKPORT	TRAFFORD
BURY	OLDHAM	SALFORD	TAMESIDE	WIGAN

Councillor Nicholas Peel	Bolton Council	Labour
Councillor Eamonn O'Brien	Bury Council	Labour
City Mayor Paul Dennett	Salford City Council	Labour
Councillor David Molyneux	Wigan Council	Labour
Councillor Bev Craig	Manchester CC	Labour

For copies of papers and further information on this meeting please refer to the website

www.greatermanchester-ca.gov.uk. Alternatively, contact the following

Governance & Scrutiny Officer: Governance and Scrutiny

✉ sylvia.welsh@greatermanchester-ca.gov.uk

This second supplemental agenda was issued on 30 January 2025 on behalf of Julie Connor, Secretary to the Greater Manchester Combined Authority, Broadhurst House, 56 Oxford Street, Manchester M1 6EU

Agenda Item 9

Minutes of the meeting of the GMCA Audit Committee, held on Wednesday 22nd January 2025, at The Mechanics' Institute, 103 Princess Street, Manchester. M1 6DD

Present:

Councillor Dylan Butt	Trafford Council
Councillor Colin McLaren	Oldham Council
Councillor Elliot Moss	Bury Council
Grenville Page	Independent Member (Chair)
Catherine Scivier	Independent Member
Susan Webster	Independent Member

Officers:

Steve Wilson	GMCA Group Chief Finance Officer
Sarah Horseman	GMCA Deputy Director, Audit and Assurance
Damian Jarvis	Internal Audit, GMCA
Paul Chase	Internal Audit, GMCA
Phil Swan	Digital Director, GMCA
Mark Scoales	Head of Digital, GMCA
Ashley Southern	Senior Systems and Intelligence Manager, GMCA
Paul Harris	GMCA Senior Governance and Scrutiny Officer

In attendance: -

Karen Murray	Forvis Mazars, External Auditor.
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AC42/24/25 Apologies for Absence

Apologies for absence were received and noted from Councillor Andrew Simcock (Manchester), Councillor Emily Mort (Bolton) (sub), Councillor Jack Youd (Salford) (sub) and Caroline Simpson Group CEO.

AC43/24/25 Chair's Announcements and Urgent Business

A. Unaudited Statement of Accounts 2023-2024

The Chair explained that he had agreed to the consideration of the unaudited Group Annual Statement of accounts 2023/2024 as urgent business, to allow members an opportunity to review the latest version of accounts ahead of the statutory publication deadline of 28th February 2025; and to consider a request to delegate authority to the GMCA Group Chief Finance Officer, in consultation with the GMCA Audit Committee Chair, the publication of the final unaudited accounts.

The Annual Governance Statement, as approved at the meeting of the Audit Committee on 22nd October 2024, was also resubmitted.

It was suggested that the discussion on the accounts takes place as part of the External Audit update at Item 12.

B. Audit Independent Member Recruitment Process.

The Group Chief Finance Officer provided an update on the recruitment process for the recruitment of independent members of the GMCA Audit Committee and the Joint Audit Panel (Police and Crime).

Members asked that this process be undertaken as a matter of urgency.

AC44/24/25 Declarations of Interest

There were no declarations of interest made by any Member of the Committee in respect of any item on the agenda.

AC45/24/25 Minutes of the Previous Audit Committee Meeting

The minutes of the meeting of the Audit Committee held on Wednesday 22nd October 2024 were submitted. An action log was also appended to the minutes.

Resolved/-

That the minutes of the previous meeting of the committee, held on Wednesday 22nd October 2024, be approved as a correct record and the action log be noted.

AC46/24/25 Joint Audit Panel Update

The GMCA Group CFO provided an update on the work of the Joint Audit Panel since the last meeting of the Committee, which set out the key issues considered by the Panel.

Following a comment from a Member in respect of Joint Audit Panel member attendance, officers confirmed that the meeting was quorate.

In response to a comment from a Member it was noted that the minutes from the Joint Audit Panel meeting in December will be shared for the information of Audit Committee, once finalised.

Resolved:-

1. That the update from the Joint Audit Panel be noted.
2. That the minutes of the Joint Audit Panel meeting from December 2024 be shared with Audit Committee members for information.

AC47/24/25 Risk Management Update

The Deputy Director Audit and Assurance, GMCA introduced a report which informed Members of changes to the GMCA Strategic and Key Operational risks. The report also provided an update on the risk management activities undertaken since the last meeting of the Committee.

Following an enquiry from a Member officers explained that the Risk Register included a specific risk heading in respect of confidence of GMP that would capture any matters associated to any child sexual exploitation inquiry. Members noted that the GMCA Safe and Secure Communities Directorate continues to review and update directorate risk profiles. Members noted that the mitigation of actions can only be included with those risked that are owned by GMCA. A Member suggested that high-level overarching assurance from the Joint Audit Panel be sought in relation to activity taking place in relation to this matter.

A Member highlighted the risk “Failure to respond effectively to local/nation emergencies” which also had the potential for to impact a number of GMCA services and activities. In response, it was noted that the Corporate Risk Manager continues to work with the GM Resilience Hub to have confidence that there are continuity planning measures in place. In addition, consideration of emergency planning preparedness of those public services that are outside of local government control needed to be understood. It was suggested that Local Resilience be considered as a deep-dive topic at a future meeting of the committee.

In respect of the retention of the bus fare cap, a Member asked what the risk to the GM budget planning process this may have. In response, it was noted that the fare cap was to remain in place until December 2025 then will be reviewed as part of the wider review of GM fares and ticketing. The Budget implications of the fare cap were to be considered at the upcoming GMCA Budget meeting in February 2025.

A Member highlighted the deferment of the Public Service Telephone Network (PSTN) change over to 2027. In response, it was noted that this activity had been

deferred to 2027 due to concerns of the potential impact the change may have to vulnerable individuals that are reliant on Telecare services. A revised approach and action plan on PSTN is awaited from Government.

In welcoming the report, a member suggested that the report would be enhanced in future with the inclusion of brief commentary on the actions and mitigations that were to be included as part of Directorate risks.

Clarity on risk appetite in relation to risks was highlighted. In response, officers were to explore risk appetite with GMCA Directorate risk owners over the upcoming months.

A Member asked how robust the risk assessment of GMCA partners is. In response, officers explained the contract management risk arrangements with third-party contractors. It was noted that partnership working is different to contract management arrangements and consideration of which bodies the GMCA engages as partners was suggested.

Resolved/-

1. That the Risk Management update, as set out in the report, be noted.
2. It was suggested that Local Resilience be considered as a deep-dive topic at a future, appropriate meeting of the Committee.
3. That the Committee seeks from the Joint Audit Panel high-level overarching assurance regarding activity taking place in relation Child Sexual Exploitation.
4. In welcoming the report, a Member suggested that the report would be enhanced in future with the inclusion of brief commentary on the actions and mitigations that were to be included as part of Directorate risks.

AC48/24/25 Risk Deep Dive - Integrated Settlement Update and GMCA Assurance Framework

A Risk Deep Dive – Integrated Settlement Update.

The GMCA Group CFO introduced a presentation which will provided an update on the Integrated Settlement. The presentation gave an overview of the Integrated Settlement, the Flexibilities and Opportunities, Funds in Scope, Quantum and Formulae, Impact on GMCA, Single Assurance Framework and Implications for GMCA Audit Committee.

In response to an enquiry from a Member, it was noted that the existing GMCA formal decision making process will not change under the Integrated Settlement arrangements. The need to develop evidence bases to support the decision-making process was highlighted.

A Member sought clarification on the leadership, behaviour and culture changes that may be required to accommodate the potential opportunities to maximise greater funding flexibility. In response, it was noted that this change will be part of the Readiness Check process. The presentation highlighted that the new GMCA Group structure demonstrated the cultural approach to develop relationships and behaviour.

Following an enquiry from a Member in respect of how potential funding flexibility will be treated, officers explained that any flexibility of funding between capital and revenue would require a business case to do so. A Readiness Check process was being conducted Deloitte to ensure the right processes are in place.

Resolved/-

That the presentation on the Integrated Settlement be received with thanks and noted.

B Draft GMCA Assurance Framework

The Deputy Director of Audit and Assurance, GMCA introduced a report which presented the draft GMCA Group Assurance Framework to Members for their review and comment. The report also explained why the Assurance Framework is

needed and what the Audit Committee's role in relation to the Assurance Framework will be once GMCA is in receipt of the Integrated Settlement from 2025/26 onwards.

Following an enquiry from a Member, officers explained the role and function of the TfGM Audit, Risk and Assurance Committee (ARAC). It was noted that as part of the Governance review, the relationship of ARAC, will be considered. In addition, Members noted that the composition of ARAC included TfGM Executive members. The Chair of ARAC is an Independent Member of the Executive Board. It was suggested that the Annual Report of ARAC be brought to a future meeting of this Committee for information.

In respect of the Governance Review, officers sought to clarify with the GMCA Monitoring Officer if the input of the Audit Committee Chair is needed in this process.

In response to an enquiry from a Member regarding NHS governance arrangements, officers clarified the role of the GM Integrated Care Partnership Board and that of the Integrated Care Board. In addition, officers undertook to review the wording in relation accountability to the paragraphs associated to the arrangements in respect of NHS and GMP in the draft Framework document.

A Member highlighted the responsibility of Management to apply the Assurance Framework and not of the Internal Audit team and asked if that this responsibility was understood within the Authority. Committee Members endorsed this approach.

Following a comment from a Member on the ability to manage cultural and behavioural change in the organisation, it was suggested that assurance around the capability to programme manage the delivery framework be considered at a future meeting of the Committee.

In response to an enquiry from a Member, officers explained that the Integrated Settlement outcomes required further discussion with Government and that the Risk

Assurance Framework will seek to articulate the risks of non-delivery and how to prevent such an occurrence taking place.

A Member asked if there would be standardisation of business case templates. In response, it was noted that a suite of templates will be developed for consistency to show adherence to the Assurance Framework but each will need to be adapted for specific business cases.

A Member highlighted that the Assurance Framework will shape the work of the Committee and deep-dive focus. In addition, accounting and reporting arrangements needed to be understood as part of the work planning process.

Resolved/-

1. That the draft Assurance framework and the Audit Committee's role from 2025/26 onwards in relation to the Framework, as set out in the report, be noted.
2. That the approach of the Assurance Framework being the responsibility of Management to apply the Assurance Framework be supported by the Committee.
3. That assurance around the capability to programme manage the delivery framework be considered at a future meeting of the Committee.

AC49/24/25 Internal Audit Progress Report

The Deputy Director Audit and Assurance, GMCA introduced a report on Internal Audit Progress and Audit Action Tracking. The report informed Members of the Audit Committee of the progress made on the delivery of the Internal Audit Plan for 2024/25.

Members also noted that the report is also used as a mechanism to seek approval of changes to the internal audit plan.

It was noted that since the last meeting of the Committee, three reports have been finalised and published, with three further reports at the draft reporting stage.

The finalised audits in respect of Leavers' Compliance, ICT/Digital Asset Management and ICT/Digital Supplier Management were summarised in the report.

In response to a comment from a Member, officers confirmed that the Principal Auditor position was a twelve-month fixed term contract.

A Member welcomed the 92% action completion rate reported and suggested that this demonstrated the value of the work of the Internal Audit team across the organisation. Concern was raised that the capacity of the team may be stretched over the upcoming months due to the requirements of the Integrated Settlement planning and implementation. In response, it was noted the Internal Audit capacity arrangements were under review and that discussions were taking place with Government in respect of the administrative funding to support the new responsibilities associated with the Integrated Settlement.

In response to comment from a Member suggesting that the ICT Audit actions will reduce the current 92% action completion rate, officers explained that it was not anticipated that the quantum of these action will impact on current performance.

Following a comment from a Member in respect of whether there was in place a detailed framework of the responsibilities of GMCA Directors. In response it was noted that the respective role profiles provide an understand of Director's responsibilities.

Resolved/-

1. That the Internal Audit progress, as set out in the report be noted.
2. That the changes to the Audit Plan, as set out at appendix c to the report be approved.

AC50/24/25 GMCA IT Asset Audit and Leavers Audit

The Director of Digital introduced a report which seeks to provide the Audit Committee with progress against audits on the effectiveness of the Leavers' process and IT asset management controls within GMCA.

It was noted that the audits were conducted to evaluate the current controls over the management of computer hardware and software assets, identify any gaps or weaknesses, and recommend improvements. It was also noted that the review is crucial for ensuring that IT assets are managed securely and efficiently, mitigating risks related to cyber security, data loss, and asset mismanagement, and ultimately supporting the organisation's operational integrity and compliance with relevant standards.

The update explained the action plan and progress being made to address to actions identified by the audits. This has included the recruitment of additional resources to help manage assets.

It was noted that repeat testing of the audit actions will take place to identify what progress has been made. An off-boarding process guide in respect of leavers has been developed.

Following a comment from a Member, it was noted that a remediation plan has been developed and that validation work was to take place by Internal Audit. In addition, target dates were to be reviewed and that the IT External Auditor will be undertaking additional work.

In response to an enquiry, officers explained that some service improvements were needed to enable the automation of the asset and leaver process.

Resolved/-

1. That the reports be noted and that a further update be provided to the next meeting of the Committee.
2. That officers be thanked for their attendance and update on progress.

The GMCA Group CFO introduced a report which provided Members with the Treasury Management Strategy Statement and Annual Investment Strategy Mid-Year Review Report 2024/25. Members were reminded that the report had been written in accordance with the requirements of Chartered Institute of Public Finance and Accountancy's (CIPFA) Code of Practice on Treasury Management (revised 2021).

The following activities were covered within the report:

- An economic update for the first half of the 2024/25 financial year;
- A review of the Treasury Management Strategy Statement and Annual Investment Strategy;
- The Authority's capital expenditure, as set out in the Capital Strategy, and prudential indicators;
- A review of the Authority's investment portfolio for 2024/25;
- A review of the Authority's borrowing strategy for 2024/25;
- A review of any debt rescheduling undertaken during 2024/25;
- A review of compliance with Treasury and Prudential Limits for 2024/25.

A Member highlighted that the report provided the assurance required, however the report covered the period up to September 2024. In response it was noted that the timing of the meetings can be reflected in future reports to the Committee.

Resolved/-

1. That the Treasury Management Strategy Statement and Annual Investment Strategy Mid-Year Review 2024/25 and treasury activity, as set out in the report be noted; and
2. That members agreed that the Treasury Management Strategy Statement and Annual Investment Strategy Mid-Year Review Report 2024/25, as set out in the report be recommend its approval to the full Authority.

AC52/24/25 External Auditor Report

The External Auditor introduced a report which set out the GMCA Audit Strategy and Completion Report. The update informed members that the 2023/2024 Audit would not be undertaken as it was not going to be possible to complete the audit by the 28th February 2025 backstop date and for this reason, a disclaimer opinion is to be issued.

Members noted that a similar backstop had been put in place for the 2024/25 audit process.

Members also noted that this was an unsatisfactory position and was the result of an arbitrary deadline being imposed.

Members were asked to consider the 2023/24 unaudited accounts and to note the changes outlined in the report. The report also asked to delegate authority to the Chief Finance Officer, in consultation with the Chair of the Audit Committee to action any changes to the unaudited accounts. The Annual Governance Statement, as approved at the Committee on 22 October 2024 was also re-submitted.

A Member highlighted that the External Auditor needed to provide a Value for Money Statement. In response, it was noted that a draft Value for Money statement will be shared with Members in the upcoming week.

In terms of the audit for 2024/2025, a Member raised concerns that there may be a similar problem next year. In response the External Auditor explained the sliding backstop arrangement with 24/25 accounts deadline of February 2026. It was also noted that changes to the Accounting Code to take place and a consultation process was underway. An update on this will be provided to the next meeting.

In addition to the Report, Members also considered the unaudited GMCA Group accounts 2024/2024.

This report provides a copy of the Greater Manchester Combined Authority (GMCA) final unaudited group statement of accounts for 2023/24.

Resolved/-

1. That the GMCA Audit Strategy and Completion report, be noted
2. That the final unaudited group statement of accounts for 2023/24 be approved and that delegated authority be granted to the GMCA Group CFO/Group Chief Finance Officer in consultation with the Audit Committee chair, the publication of the final unaudited accounts.
3. That the Annual Governance Statement, as approved at the Audit Committee on 22nd October 2024, be endorsed.
4. That an update on the Accounting Code consultation was to be provided to the next meeting.
5. That the Value for Money statement be shared with Committee Members.

AC53/24/25 Audit Committee Work Programme 2024 -2025

Audit Committee members were asked consider and comment on the work programme of items that will provide a focus for the work of the Committee for the remainder of the 2024/25 municipal year.

It was noted that the Committee will look to programme the deep-dive topics identified at the previous meeting as part of a longer-term work programme at the meeting of the Committee in March 2025.

It was noted that a Budget training session for members have been arranged.

In respect of the Committee effectiveness work, it was suggested that a virtual workshop be arranged.

Resolved/-

That the Audit Committee Work Programme for 2024/25 be noted and that a longer-term work programme be developed and be presented to the next meeting of the Committee.

AC54/24/25 Dates and Times of Future Meetings

To note the future meeting dates for the Committee of Wednesday 19th March 2025, commencing at 10:00 am.

Greater Manchester Combined Authority

Date: 31 January 2025

Subject: GM Clean Air Plan – January 2025 Update

Report of: Cllr Eamonn O’Brien – GM Clean Air Lead

Purpose of Report

This report provides an update on the Greater Manchester Clean Air Plan now that the government has accepted the assessment that an investment-led, non-charging Greater Manchester Clean Air Plan will achieve compliance with nitrogen dioxide levels on the local road network in the shortest possible time and Greater Manchester will not need to implement a charging Clean Air Zone (CAZ).

Recommendations:

The GMCA is requested to:

1. Note that government confirmed it has accepted the assessment that an investment-led, non-charging Greater Manchester Clean Air Plan will achieve compliance with nitrogen dioxide levels on the local road network in the shortest possible time and by 2026 and Greater Manchester will not need to implement a charging Clean Air Zone (CAZ).
2. Note the investment-led package of £86m confirmed by government consists of:
 - £51.1m towards bus investment, including 40 zero emission buses, 77 Euro VI standard buses and charging infrastructure;
 - £5m for local traffic management measures;
 - £8 million to support moving Greater Manchester’s taxi fleet to cleaner vehicles;
 - Up to £21.9m for administration, delivery, monitoring and other associated costs.
3. Note a new direction from the government is expected to be issued to the Greater Manchester authorities imminently which will allow TfGM to understand the detailed breakdown of the funding awarded for Development, Administration, Risk & Contingency.

4. Note that proposals on funding to support Greater Manchester's taxi fleet move to cleaner vehicles, including timelines for next steps, such as fund opening, will be presented at the next meeting.
5. Note TfGM and the GM Authorities are working together to assess the potential alternative use of signage, timelines for next steps will be presented at the next meeting.
6. Note a public consultation on the use of the cameras for potential law enforcement activity related to the detection of crime is anticipated for the summer of 2025, subject to a review of the financial, technological and legal options available to facilitate a change of use.
7. Note that the GM Air Quality Administration Committee will consider a report at its meeting on 5 February 2025.

Contact Officers

Caroline Simpson – Group Chief Executive, GMCA, GMFRS & TfGM
– caroline.simpson@greatermanchester-ca.gov.uk

Gill Duckworth – GMCA Solicitor and Monitoring Officer –
gillian.duckworth@greatermanchester-ca.gov.uk

Megan Black – Head of Logistics & Environment –
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Equalities Impact, Carbon and Sustainability Assessment:

The GM Clean Air Plan is a place-based solution to tackle roadside NO₂ which will have a positive impact on carbon.

Risk Management

Risks were set out in the Appraisal Report [Appraisal Report - Approved.pdf](#).

Legal Considerations

Until a new direction is issued by the government, *The Environment Act 1995 (Greater Manchester) Air Quality Direction 2022* (the Direction) issued on 8th February 2022 remains in place. The Direction requires that the GM local authorities:

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

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

- compliance with the legal limit value for NO₂ is achieved in the shortest possible time and by no later than 2026; and
- exposure to levels above the legal limit for NO₂ is reduced as quickly as possible.

This Direction revoked the Direction dated March 2020 which required the ten Greater Manchester Local Authorities to implement a Category C Clean Air Zone to achieve compliance with the legal limit value for NO₂ in the shortest possible time and by 2024 at the latest.

Financial Consequences – Revenue

Financial consequences were set out in the Appraisal Report [Appraisal Report - Approved.pdf](#), with all development and delivery costs to be covered by central government. A new direction from the government is expected to be issued to the Greater Manchester authorities which will allow TfGM to understand the detailed breakdown of the funding awarded for Development, Administration, Risk & Contingency.

Financial Consequences – Capital

As Revenue Funding above.

Number of attachments to the report: One

Comments/recommendations from Overview & Scrutiny Committee

Not applicable.

Background Papers

- 1 October 2024, report to AQAC: GM Clean Air Plan – September 2024 Update
- 20 December 2023, Report to AQAC: GM Clean Air Plan – December 2023 Update
- 20 December 2023: Report to AQAC: GM Clean Air Plan – Expenditure Update
- 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 2021, report to AQAC: GM Clean Air Plan – Clean Air Zone: Camera and Sign Installation
- 21 September 2021, 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.

Tracking/ Process

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

No

Exemption from call in

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

Bee Network Committee – Not applicable

Overview and Scrutiny Committee – Not applicable

GM Clean Air Scrutiny Committee – Not applicable

1 Background

- 1.1 In 2017 the government has instructed many local authorities across the UK to take quick action to reduce harmful Nitrogen Dioxide (NO₂) levels following the Secretary of State (SoS) issuing a Direction under the Environment Act 1995. In Greater Manchester, the 10 local authorities, the Greater Manchester Combined Authority (GMCA) and Transport for Greater Manchester (TfGM) are working together to develop a Clean Air Plan to tackle NO₂ exceedances at the roadside, herein known as Greater Manchester Clean Air Plan (GM CAP).
- 1.2 The development of the GM CAP is funded by government and is overseen by the Joint Air Quality Unit (JAQU), the joint DEFRA and DfT unit established to deliver national plans to improve air quality and meet legal limits. The costs related to the business case, implementation and operation of the GM CAP are either directly funded or underwritten by government acting through JAQU and any net deficit over the life of the GM CAP will be covered by the New Burdens Doctrine, subject to a reasonableness test¹.
- 1.3 In June 2021 the GMCA endorsed a final GM Clean Air Plan and policy following a review of the information from the GM CAP consultation and wider data, evidence and modelling work. The plan was then agreed by the ten GM local authorities. This included a Greater Manchester-wide category C charging Clean Air Zone (CAZ), where the most polluting vehicles that did not meet emission standards would have been charged to drive in the Zone.
- 1.4 It was originally intended that the CAZ would go live from May 2022, affecting non-compliant HGVs, buses and non-GM-registered taxi and private hire vehicles. Work to install the CAZ signage and Automatic Number Plate Recognition (ANPR) cameras for monitoring the CAZ began in summer 2021, alongside the development of back office systems.
- 1.5 The CAZ was designed to comply with a legal direction from government issued before the coronavirus pandemic, to deliver compliance with NO₂ legal limits on the local road network by 2024. However, in late in 2021, Greater Manchester commissioned an independent review of emerging global supply chain issues and the impact this could have on the cost and availability of vehicles.
- 1.6 Based on this the Greater Manchester Mayor and Leaders determined that the original Clean Air Plan was unworkable, Government agreed in February 2022 to lift the previous legal direction requiring GM to achieve compliance with legal NO₂ limits by 2024.
- 1.7 Government directed Greater Manchester to present a revised plan to achieve compliance with legal levels of NO₂ on the local road network in the shortest time possible and by no later than 2026.

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/government/news/new-burdens-doctrine-guidance-for-government-departments)

- 1.8 Greater Manchester has accordingly been working to develop a package of measures to deliver NO₂ reductions to within legal limits within the shortest possible time and by 2026 at the latest. The first 'Case for a new Greater Manchester Clean Air Plan' to deliver compliance with the legal limit value in the shortest possible time and by no later than 2026 was submitted in July 2022, a revised submission in December 2023 and a further revised submission in October 2024.
- 1.9 The primary focus of the plan is to achieve compliance with the legal limit value for NO₂ in a way that considers the current cost of living crisis and associated economic challenge faced by businesses and residents, through an investment-led approach. The evidence submitted showed that the Investment-led Plan is the only option tested which meets the legal requirement placed on the 10 GM Authorities to deliver compliance in the shortest possible time and by 2026 at the latest.
- 1.10 The plan set out that, building on the transformational Bee Network, GM's Investment-led Plan would target Clean Air funding already awarded by government to invest:
- £51.1m in 40 new zero-emission electric buses depot electrification in Manchester & Bolton and 77 OEM Euro VI buses.
 - £30.5m for a Clean Taxi Fund to support GM-licensed owners to upgrade to cleaner vehicles.
 - £5m to manage traffic flows on roads in Manchester and Salford.
- 1.11 The core objectives of the new GM CAP are:
- To reduce NO₂ concentrations to below the legal limits in the shortest possible time and by 2026 at the latest;
 - To achieve compliance in a way that is fair to businesses and residents, and does not damage business or cause financial hardship to people in GM; and
 - To ensure the reduction of harmful emissions is at the centre of GM's wider objective for delivering the Bee Network's core objectives.
- 1.12 The 'Case for a new Greater Manchester Clean Air Plan' proposed using the £123 million of Clean Air funding that the government has awarded to Greater Manchester to deliver an investment-led approach to invest in vehicle upgrades, rather than imposing daily charges and in particular through the delivery of zero-emission buses in the Bee Network (a London-style integrated transport network). The new plan would ensure that the reduction of harmful emissions is at the centre of GM's wider objectives. A summary of the GM CAP measures as submitted is set out at **Appendix 1**.

2 Key Developments Since October 2024 Submission

- 2.1 Having submitted evidence to support Greater Manchester’s Investment-led Plan in October 2024², on 23rd January the government confirmed it has accepted the assessment that an investment-led, non-charging Greater Manchester Clean Air Plan will achieve compliance with nitrogen dioxide levels on the local road network in the shortest possible time³. As a result, Greater Manchester will not need to implement a charging Clean Air Zone (CAZ).
- 2.2 The agreed investment-led package includes:
- £51.1m towards bus investment, including 40 zero-emission buses, 77 Euro VI standard buses and charging infrastructure;
 - £5m for local traffic management measures;
 - £8 million to support moving Greater Manchester’s taxi fleet to cleaner vehicles;
 - Up to £21.9m for administration, delivery, monitoring and other associated costs.
- 2.3 A summary breakdown of the award against the Investment-led Plan costs outlined in October 2024 is set out in the table below.

	Cost Plan – October 2024	Government Award – January 2025
Bus Investment	£51.1m	£51.1m
Taxi Investment (Clean Taxi Fund)	£30.5m	£8.0m
Local measures	£5.0m	£5.0m
Development, Administration, Risk & Contingency	£37.1m	Up to £21.9m
Investment Led Plan Total	£123.7m	£86.0m

- 2.4 A new direction from the government is expected to be issued to the Greater Manchester authorities imminently which will allow TfGM to understand the detailed breakdown of the funding awarded for Development, Administration, Risk & Contingency.

3 Implications

- 3.1 Bus Investment – Investment in cleaner buses represents the most important mechanism for reducing exceedances under the Investment-led Plan and is grounded in the ability, now provided by GM operating a bus franchising scheme, for TfGM to manage franchise agreements in respect of local services, including the specification of fleet requirements and deployment.

² <https://cleanairgm.com/technical-documents/#updated-evidence-submission-for-a-new-greater-manchester-clean-air-plan>

³ <https://www.gov.uk/government/news/government-backs-local-plans-for-clean-air-in-greater-manchester--2>

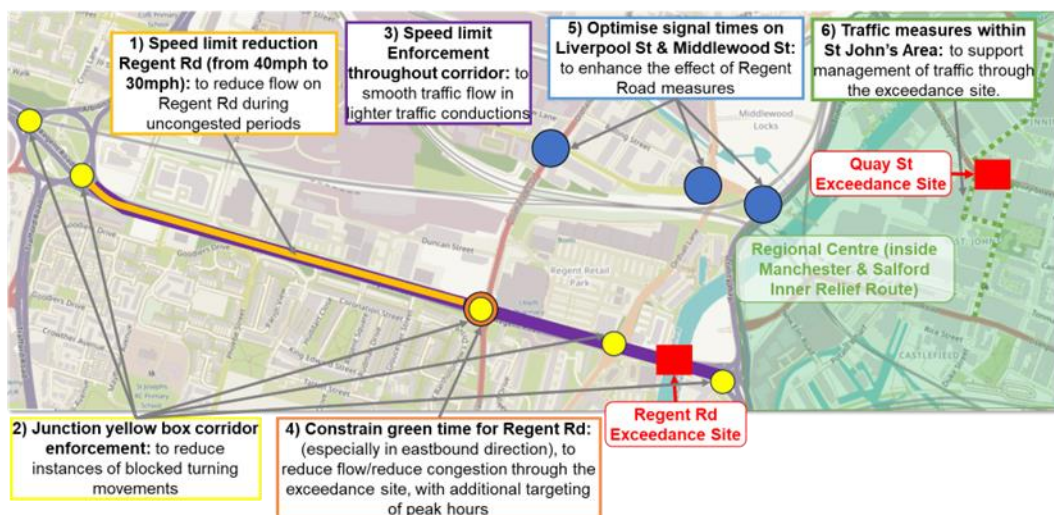
3.2 Greater Manchester has secured all the funding requested for cleaner buses as part of the Investment-led Plan. Transport for Greater Manchester will now commence the required:

- ZEB upgrade: deploying 40 zero-emission buses (ZEB) where it is modelled that compliance cannot be achieved through upgrade to OEM Euro VIs alone.
- OEM Euro VI upgrade: 77 vehicles modelled to be operated from the Stockport depot onto routes for clean air purposes where compliance can be achieved via a OEM Euro VI fleet.
- Depot electrification to support the additional ZEBs.

3.3 Local Measures – Investment in targeted local measures can be summarised into the following, as shown in **Figure 1** below:

- Signal optimisation at A57 Regent Road and adjacent parallel routes;
- Speed restrictions on A57 Regent Road with supporting enforcement measures;
- Yellow box enforcement along the A57 Regent Road corridor; and
- Traffic management measures – St John’s area

Figure 1 Overview of local measures



3.4 Greater Manchester has secured all the funding requested for these local traffic measures. Transport for Greater Manchester will work with Salford and Manchester City Council's to progress the detailed design.

3.5 Clean Taxi Fund – Greater Manchester appreciates the government's support for the Investment-led Plan but is disappointed not to secure full funding for taxi fleet upgrades. The original plan requested £30.5m to help upgrade GM-licensed hackney and private hire vehicles. However, only £8m has been approved for this purpose.

- 3.6 Since the Clean Air Plan was first proposed in 2018, the taxi trade has been anticipating the establishment of a Clean Taxi Fund, a topic frequently raised with Greater Manchester Leaders. Recognising their classification as high-frequency users in the Clean Air Zone Framework for England, falling under Category A due to their substantial per-vehicle emissions alongside buses, the original Clean Air Zone proposals led to a clear expectation within the taxi community that dedicated funds would be allocated to support their transition to cleaner vehicles, standards that are now mandated by the introduction of minimum emissions standards by all Greater Manchester Authorities.
- 3.7 The expectation of funding has resulted in taxi owners delaying upgrading their vehicles and consequently the GM taxi fleet being older and more non-compliant (GM-licensed Hackney Carriages remain largely non-compliant (62%) based on June 2023 licensing data).
- 3.8 Greater Manchester leaders recognise the importance of financial support for the licensed trade and are committed to ensuring that those registered locally have access to financial assistance, thereby upholding local standards and mitigating the impact of competition from out-of-area licensees.
- 3.9 The Greater Manchester Authorities will be working with TfGM and GMCA to determine how the funding provided will be used to support the move to cleaner taxis, with consideration for any impacts to implementation of the end of transition period for existing vehicles that do not meet the emissions standard. This will include a review of the taxi funding requirement based on the latest taxi licensing data. Proposals and timelines for next steps, such as fund opening, will be presented at the next meeting.
- 3.10 Signage – As Greater Manchester does not need to implement a charging Clean Air Zone (CAZ) signs that were erected across the ten GM Local Authorities and the eight neighbouring authorities and funded by government, as set out at para 1.2 need consideration. TfGM and the GM Authorities are working together to assess the potential alternative use of signage.
- 3.11 Automatic number plate recognition (ANPR) cameras – the cameras installed to identify non-compliant vehicles travelling in formerly planned CAZ and funded by government, as set out at para 1.2 have been used to support the development of the investment-led, non-charging GM Clean Air Plan – by helping GM better understand:
- The current vehicle fleet on the city-region’s roads and their emissions.
 - Where the city-region would get the greatest emissions reductions by tackling polluting vehicles travelling regularly through GM’s most nitrogen dioxide polluted places.
- 3.12 Under an Investment-led Plan, some of the ANPR cameras procured as part of the Previous GM CAP would be used to monitor and evaluate the effectiveness of the investment-led scheme but once GM’s local authorities meet their air quality legal limits, the ANPR cameras will no longer be needed for Clean Air Plan purposes.

- 3.13 Through formal requests, Greater Manchester Police (GMP) can currently ask for ANPR data to help them gather evidence for criminal investigations.
- 3.14 Greater Manchester Leaders have called for government support to the use of the cameras for potential law enforcement activity related to the detection of crime, subject to the consideration of the outcome of public consultation.
- 3.15 The government have agreed this principle and work has begun between GMP, TfGM and GMCA to explore the financial, technological and legal options available to facilitate such a change of use. Any final decision will require a public consultation and TfGM, GMCA and GMP will continue working towards that consultation stage, anticipated for the summer of 2025.
- 3.16 National Highways is responsible for the work carried out on signage on the Strategic Road Network (SRN), which includes motorways. At the time of writing no details on the removal of their signs is known and GM will closely with NH to look at uses of signage on SRN, for example exploring promotion of park and ride sites.

4 Next Steps

- 4.1 The GM Air Quality Administration Committee will consider a report at its meeting on 5 February 2025.
- 4.2 To implement the investment-led Clean Air Plan the GM Authorities will now:
- Mobilise resources to deliver and oversee the implementation of the investment-led Clean Air Plan.
 - Secure the additional ZEBs and the OEM Euro VI upgrades along with depot electrification to support the additional ZEBs.
 - Start work to implement local traffic measures with Salford and Manchester City Council's.
 - Determine how the taxi funding provided will be used to support the move to cleaner vehicles, with consideration for any impacts to implementation of the minimum emission standard for existing vehicles that do not meet the standard.
 - Assess the best appropriate and cost-effective method for reallocation/reuse of signs.
 - Explore the financial, technological and legal options available to facilitate a change of use of the ANPR cameras.
 - Begin negotiations to terminate or revise the contracts for the approved scheme.
 - Reflect the final scheme in a Performance Management Plan.
 - Update Cost Plan to align with government funding award with specific adjustments needed for administration, delivery, monitoring and other associated costs.
 - Produce a Delivery Plan for the agreed Investment-led Plan.

5 Recommendations

- 5.1 The recommendations are set out at the front of the report.

6 Appendix 1: Summary of proposed CAP Measures – October 2024

Investment-led CAP measure	Description
GM-Wide Funds	
Funding for ZEBs	Funding will be allocated to purchase ZEBs that operate on services that pass remaining exceedance sites which cannot achieve compliance in the shortest possible time and by 2026 at the latest through an upgrade to an OEM Euro VI buses.
Bus Electric Charging Infrastructure	Funding to provide electric charging infrastructure to support the additional ZEBs which are required to operate on modelled exceedance routes to achieve compliance at these locations alongside other investment-led measures. Based on the bus services identified for upgrade, these operate out of three different depots in addition to the Manchester City Centre Free Bus which operates from Manchester Piccadilly Approach.
Funding for Taxis	<p>Taxi funding will be delivered in the form of a grant or vehicle finance contributions for the upgrade of hackney carriages and PHVs licensed in GM to cleaner vehicles. Eligible applicants will be offered a running cost grant towards the running costs of a new ZEC vehicle, or a contribution towards a replacement vehicle, which may be taken as a lump sum grant or access to vehicle finance. There are two funding routes proposed for taxis:</p> <ul style="list-style-type: none"> • Core Fund: This fund will be available for GM-licensed, non-compliant hackney carriages and PHVs. • EV Hackney Fund: this fund will be available for GM-licensed, Internal Combustion Engine compliant hackney carriages. <p>The per-vehicle funding amounts are consistent across both funding routes. The per-vehicle funding amounts are split into funding for upgrade to wheelchair accessible vehicles (WAVs) and funding for upgrade to non-wheelchair accessible vehicles (non-WAVs), as follows:</p> <p><u>Upgrade to WAV</u></p> <ul style="list-style-type: none"> • up to £12,260 towards the running costs of a new purpose-built WAV ZEC replacement vehicle. This option is available when the compliant replacement vehicle acquired with GM CAP funds has also been eligible for a government plug-in grant; or • up to £12,260 towards a second-hand purpose-built WAV ZEC replacement vehicle; or • up to £6,280 towards a compliant purpose-built WAV replacement vehicle (Euro IV petrol or Euro VI diesel or better). <p><u>Upgrade to non-WAV</u></p> <ul style="list-style-type: none"> • up to £7,530 towards the running costs of a new ZEC replacement vehicle; or • up to £7,530 towards a second-hand ZEC replacement vehicle; or • up to £3,770 towards a compliant replacement vehicle (Euro 4 petrol or Euro 6 diesel or better); or • up to £6,280 towards a compliant replacement 6+ seater vehicle (Euro IV petrol or Euro VI diesel or better).

Investment-led CAP measure	Description
	All funding is subject to meeting eligibility criteria.
Local Measures	
Signal optimisation at A57 Regent Road	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. By implementing these signal changes, traffic flow will become steadier, reducing unnecessary accelerations and deceleration, and leading to a reduction of emissions through the exceedance site.
Speed reductions on A57 Regent Road	Implementation of a speed reduction from 40mph to 30mph on A57 Regent Road between Oldfield Road and M602. This measure would influence trips outside of the peak periods, during free-flow conditions, making Regent Road a less attractive route and therefore reducing traffic flow leading to a reduction in emissions.
Measures to reduce through traffic at A34 Quay Street area	Implementing measures to reduce through traffic in the St John's area of the Regional Centre which access the A34 Quay St / Great Bridgewater St exceedance locations. The aim of this measure is to perceive these roads as low speed and low capacity and therefore avoid them unless necessary.

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