

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.

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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>

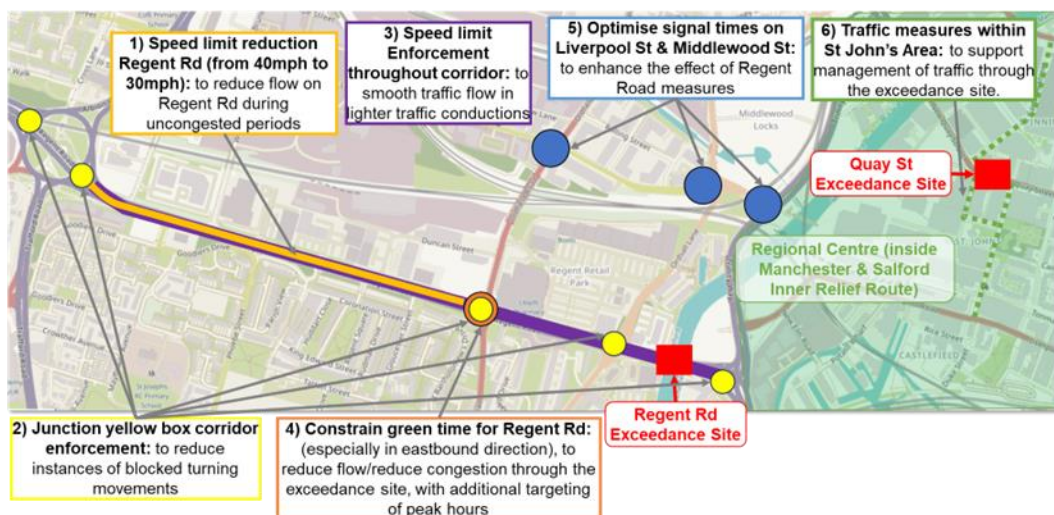
3.2 Greater Manchester has secured all the funding requested for cleaner buses as part of the Investment-led Plan. Transport for Greater Manchester will now commence the required:

- 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.