LOWCARBON HUB BOARD

Date: 03 October 2017
Subject: Clean Air Update
Report of: Head of Logistics, Environment & Active Travel, TfGM

PURPOSE OF REPORT

To provide Board members with an update on the UK Plan for Tackling Roadside Nitrogen Dioxide Emissions and the implications for Greater Manchester.

RECOMMENDATIONS:

The Board are recommended to:

(i) Note the contents of the report.

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1. **INTRODUCTION**

1.2 DEFRA published the previous UK Plan for Tackling Roadside Nitrogen Dioxide Emissions in December 2015. Client Earth deemed this plan to be insufficient and they took their case to the High Court. In December 2016 the Supreme Court ordered the Government to draw up more far reaching and radical plans to tackle air pollution across the UK and improve air quality. DEFRA released the draft plan for consultation on 5th May 2017.

1.3 In the previous Plan the Government proposed a solution incorporating Clean Air Zones (CAZ) in several of the more polluted/harder to tackle areas in the UK. The plan mandated five areas outside of London to introduce charge based/access restriction based CAZ solutions. The plan did not include any areas in Greater Manchester, however, the Combined Authority was funded by DEFRA to undertake a voluntary feasibility study, which is currently underway but focuses on a small number of scenarios within the inner relief road and within the M60.

1.4 TfGM submitted a response to the consultation on behalf of the Combined Authority. The consultation closed on 15th June and the final UK Plan was published on 26th July 2017.

2. **THE UK PLAN FOR TACKLING ROADSIDE NITROGEN DIOXIDE EMISSIONS**

2.1 The final Plan sets out a series of activities which will be delivered at the national level as well as placing responsibility on local authorities to bring forward plans which will achieve the required emissions reductions at a local level.

2.2 National plans include:

- A ban on the manufacture of internal combustion diesel and petrol engine vehicles from 2040.
- Plans to consult on auxiliary measures to support clean air zones, such as a diesel scrappage scheme, in summer 2017.
- Plans to bring forward supporting strategies for Clean Growth, Pathway to Zero and Wider Clean Air Strategy in 2018.

2.3 The document also outlines the £3bn funding package available to support the delivery of the required interventions, of which £255m is new funding available to local authorities to assist in developing plans to address exceedances.

2.4 At a local level the Government makes clear that local authorities have a key role to play in identifying and implementing plans to reduce emissions.
The plan sets out that 29 local authorities, including seven districts within Greater Manchester, must undertake comprehensive feasibility studies, assessing a wide range of options, to identify solutions to local exceedances. Initial plans must be put forward by March 2018, with final plans being agreed by December 2018. The Government reserves the right to oversee the feasibility process and approve the final plan.

The Government has not yet confirmed the date for publication of the feasibility guidance document or allocation of funding. DEFRA has suggested that both will be released within the next two months.

The Government has identified charge-based clean air zones as the measure it is able to model nationally which will achieve statutory NO2 limit values in the shortest possible time. The document states that if a local authority can identify measures other than charging zones that are at least as effective at reducing NO2, and are at the same or lower cost, those measures should be preferred as long as the local authority can demonstrate that this will deliver compliance as quickly as a charge-based CAZ. It goes on to say that there is high uncertainty of the effectiveness of other, non-charge-based measures.

The DEFRA modelling and subsequent plan are focused at A-road level and are based on a 2001 model of the urban area, using 2015 air sampling data. They have identified specific and small stretches of the highway network as requiring additional measures. The plan does not account for town and city centre exposure levels, local variances, impacts on the wider network, traffic dispersion or planned development.

GM RESPONSE

The approach taken at the national level means that there are now two individual but related issues to be addressed within GM – the specific exceedances identified through the national modelling approach; and the GM Air Quality Management Area.

In dialogue with the Joint Air Quality Unit (JAQU), TfGM, on behalf of the Combined Authority, has been clear that:

- Addressing harmful emissions as a contributor to ill health is central to the strategy for the city region.
- Whilst the move to ban the manufacture of petrol and diesel vehicles from 2040 is welcomed, there is an immediate need for action and funding to deliver the required reductions.
- It is disappointing that the plan allows more time for the development of the national policy position but expects local authorities to develop their local plans to extremely tight deadlines without having clarity about national plans.
There is a desperate need for a complementary and comprehensive national strategy backed with substantial, up-front investment.

The reality is we will only truly tackle air pollution if we can also give people reliable and affordable alternatives to diesel cars. Clean public transport (especially buses) and support to encourage cycling and walking are a key part of the overall solution.

4. IMPLICATIONS OF THE REVISED PLAN FOR GREATER MANCHESTER

4.1 The development of the best possible solution for GM, which is aligned with the wider strategy position, and complementary to activities which address other GM priorities is vital. This will require a robust evidence base and detailed assessment of DEFRA’s modelling.

4.2 At present there is a collaborative approach to addressing air pollution within GM. The legal responsibility for achieving air quality objective levels and the legal power to implement access restriction type interventions on the highway both sit with the Local Authority. At present, the responsibility for tackling air pollution within GM is held by the Combined Authority and discharged via TfGM.

4.3 Feasibility work and subsequent interventions should be implemented on a GM wide basis to ensure a solution which tackles the problem without impacting negatively on the surrounding areas.

4.4 The resulting proposals should include a package of measures which are directed not only towards achieving compliance with the DEFRA (and legal) requirements but which can also bring about changes to reduce air pollution, and its impacts on health, more broadly across the conurbation.

4.5 One of the priority areas of focus will be to build on and ensure integration with other strategic priorities including the GMCA broader health agenda, the green city summit and the integrated transport agenda. Discussion have already taken place in relation to alignment with the congestion plan and with the walking and cycling commissioner.

4.6 The timescales for action as set out in the National Plan are very tight. The feasibility studies must be mobilised quickly with clear established scopes.

4.7 Due to the wider impacts for all GM authorities of any intervention decisions, a clear governance arrangement is important. In November 2016, WLT agreed that each Local Authority would establish a local air quality steering group. It was agreed that the steering group should have senior management representation and include representatives from Planning (both strategic and development control), Transportation/Highways, Environmental Health (Air Quality) and Public Health. This group in each of the authorities will be the main point of
communication, information provision, escalation and local decision making. The interface between the project team and each of the steering groups will be via the GM Senior Office District Steering Group. All key decisions will be escalated to WLT.

5. INITIAL PROGRAMME

5.1 The Joint Air Quality Unit (JAQU) has stated that they will release the feasibility guidance and supporting funding within the next couple of months. No date has been confirmed. On the basis that TfGM will lead the feasibility work on behalf of the ten local authorities (not yet approved), an agreement has been made with JAQU for the release of early funding to allow work to commence.

5.2 To ensure that GM is in the best possible position to respond to the plan, the following activities are underway:

- Following the publication of the Government’s National Air Quality Plan, TfGM is analysing the proposal and communicating with JAQU to develop a better understanding of the implications for GM and what support may be available to assist with any feasibility work;
- TfGM established an internal project team which is currently setting out the framework and proposed scope for the feasibility project.
- Work will continue, in line with local authority officers, to determine the scope of the feasibility study/studies;
- The initial CAZ feasibility study will proceed to conclusion in September 2017 and the information will be used to inform the development of the proposed solution.
- Work will continue via the Highways Strategy Board on a collaborative approach with Highways England to investigate the air quality problem in more detail and explore innovative and appropriate solutions.

5.3 The initial proposal is for a six strand approach to the feasibility work:

- Scope and assessment framework – To be developed in line with JAQU requirements and the approach of other city regions.
- Data and evidence – assessment of the DEFRA modelling approach against the GM data to provide better clarity of the problem to be addressed and challenge any inconsistencies.
- Existing plans – maximising the potential of existing activities such as Growth Deal schemes and interventions identified within the Congestion Plan
- New proposals – bringing forward a wider package of measures including existing aspirations and innovative trials for testing.
- The Plan – bringing together the overall proposal for GM approval and submission to JAQU
- Communication and engagement – preparing for and managing communication in relation to the in-scope interventions.

5.4 Although we have made a clear statement that GM will not implement charge-based clean air zones, there remains a requirement to use the timescales of such for intervention in the wider feasibility study to provide a benchmark against which JAQU will measure the suitability of the proposed solution. Greater Manchester will need to provide data to illustrate what could be achieved in terms of timescales and emissions reductions with the implementation of a charge based clean air zone. The Government does not specify what class of zone must be used as the benchmark but the current assumption is that it would be based on the most economically viable option.

6. **RECOMMENDATIONS**

6.1 Recommendations are set out at the front of this report.

_Helen Smith_

_Head of Logistics, Environment & Active Travel, TfGM_