PURPOSE OF REPORT

To provide the Committee with an update on the air quality work programme and the implications of the draft revised Department for Environment, Food and Rural Affairs (DEFRA) national plan to tackle nitrogen dioxide emissions.

RECOMMENDATIONS

Members are asked to:

(i) note the contents of the report.

BACKGROUND DOCUMENTS

None

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1. Introduction

1.1 Greater Manchester (GM) currently has an Air Quality Management Area (AQMA) which covers each of the ten districts. Areas identified within the AQMA are in breach of, or at risk of breaching, the European Ambient Air Quality Directive which sets the legal annual mean threshold for nitrogen dioxide (NO2) at 40 micrograms per cubic metre. To account for the accuracy of the modelling and real world emissions, the GM AQMA is declared at 35 micrograms per cubic metre rather than the European Union (EU) directive level of 40. Whilst air quality in GM meets the EU directive objective levels for PM10 (particulates), it is a widely held belief by the medical profession that there is no known safe level.

1.2 DEFRA has recently launched a consultation into a revised National Air Quality Plan following legal challenge over its December 2015 Plan, which has implications for GM, if implemented. This report sets out a proposed way forward for both the consultation response and preparation of a GM strategy to respond to its implications.

2. Background

2.1 In August 2016, GM agreed its approach to tackling air quality through the publication of the TfGM authored Air Quality Action Plan (AQAP) and Low Emission Strategy (LES). In GM, road transport accounts for 65% of NOx and 79% of PM emissions, along with 31% of CO2 emissions. In terms of the harmful effects on people, this is greatest where high-density residential areas coincide with major highways and, therefore, many of GM’s AQMA areas are aligned to major highways. Therefore, the strategic objectives of the AQAP and LES focus on initiatives to:

- reduce emissions from road transport to improve air quality; and
- contribute to a reduction in CO2 emissions.

2.2 Delivery of the AQAP has commenced and several activities are current in the delivery phase. Procurement is underway to provide an expanded air pollution monitoring network by November 2017. Trials are also taking place with various organisations to explore the benefits of an enhanced sensor network, which could provide better quality real-time information that could be used to inform and influence travel choices.

2.3 The existing GreatAirManchester website is being refreshed with the aim of providing a suitable platform for all AQ related communications across GM. TfGM is currently coordinating campaign activities for the first Clean Air Day which is to be held on 15 June 2017. Objectives are:
• Increased public awareness about both transport and air pollution, and the measures that can be adopted to both reduce personal contribution to pollution and reduce exposure;

• Encourage travel behaviour changes by children and parents and increased usage of sustainable transport modes; and

• Support businesses to adopt sustainable transport modes and to encourage their staff to make small changes to their travel plans which contribute to reductions in air pollution.

3. National Plans

3.1 DEFRA published the last National Air Quality Plan in December 2015. Client Earth deemed this plan to be insufficient and they took their case to 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 was originally ordered to release draft plans for consultation by 24 April 2017 and publish the final plan by 31 July 2017.

3.2 Following the announcement of the General Election to be held on 8 June, DEFRA appealed to the Supreme Court for an extension to the original deadlines but were unsuccessful. The draft plan was released for consultation on 5 May 2017. Consultation closes on 15 June and the final plan is due to be published on 31 July 2017.

3.3 In its original National Air Quality 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 GM Combined Authority elected to undertake a voluntary feasibility study, which is currently underway but focuses on a small number of scenarios within Manchester.

4. Implications of the revised plan for Greater Manchester

4.1 The revised DEFRA plan sets out the areas within eight districts (Bolton, Bury, Manchester, Salford, Stockport, Tameside, Trafford and Wigan) within Greater Manchester which are likely to require additional measures to achieve the objective levels by 2020. The final published plan is expected to confirm the local authorities which will formally and legally be required to develop and implement comprehensive Clean Air Zone plans. It will then be the responsibility of local authorities to develop innovative proposals for their local area that will bring pollution levels within the legal limits within the shortest time possible. This will include the consideration
of a wide range of options, exploring new technologies (e.g. retrofitting technologies, alternative fuels, low emission vehicles) and seeking to support the Government’s industrial strategy so that they can deliver in a way that best meets the needs of their communities and local businesses. Plans may or may not include a charge-based clean air zone.

4.2 The development of the best possible solution for GM, which is aligned with the wider strategy position, is vital. This will require a robust evidence base and detailed assessment of DEFRA's modelling.

4.3 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.

5. **Factors to Consider**

5.1 The timescales for action are likely to be very tight. The legal deadline for compliance with the objective levels is 1 January 2020. DEFRA has not yet announced the timelines for the delivery of the revised strategy, however, early conversations with DEFRA indicate that areas within GM may be expected to implement by December 2019. The CAZ programme is extremely complex and will be challenging to deliver within this timeline.

5.2 DEFRA carries out their modelling at A-road level and it is based on a 2001 model of the urban area. TfGM is able to model the whole urban area and provide a more detailed estimation of the likely position at 2020. The complication is that DEFRA is likely to identify very specific and small stretches of the highway network as requiring additional measures. The DEFRA plan will not account for local variances, impacts on the wider network, traffic dispersion or planned development. Feasibility work will, 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.

5.3 There are several activities which will need to be undertaken for more than one local authority area within GM and there will be efficiency and cost savings from undertaking these through one central point. Examples include dialogue with the Driver and Vehicle Licensing Agency (DVLA) and DEFRA, formal consultation, communication and engagement, traffic and emissions modelling and infrastructure procurement. Equally, it is advisable to adopt the same operational, enforcement, communication and payment strategies across the conurbation to assist the understanding of the general public and reduce impact on businesses. It
is proposed that TfGM leads on the development of the clean air zone proposals for the city region.

6. **Consultation Response**

6.1 It is proposed that TfGM will lead on the development and submission of the consultation response in conjunction with officers from each of the local authorities; and the response will be signed off by the Mayor on behalf of the Combined Authority.

6.2 Many specific points are being raised for inclusion in the formal response. The overarching points include:

- The importance of recognising that the DEFRA modelling and subsequent approach should not preclude a strategic and collaborative GM wide solution from being developed;

- Due to the dense urban motorway network which runs through the conurbation, we encourage government to strongly draw Highways England into the final plan; and

- Noting the reference to potential funding streams and challenging timescales, that Government should quickly provide clarity on the support which will be available for cities in the investigation and implementation of any solutions, as well as clarity regarding the package of national auxiliary measures to support and CAZ implementation.

7. **Initial Programme**

7.1 In the short term, the following approach is proposed:

- Following the publication of the Government’s draft revised National Air Quality Plan, TfGM is analysing the proposal and communicating with DEFRA to develop a better understanding of the implications for GM and what support may be available to assist with any implementation;

- Work will continue, in line with local authority officers, to develop the formal GM response to the DEFRA consultation; and

- 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.
7.2 Work will continue on a collaborative approach with Highways England to investigate the air quality problem in more detail and explore innovative and appropriate solutions.

8. Recommendations

8.1 Members are asked to:

   (i) note the contents of the report.

Stephen Rhodes,

Customer Director, TfGM