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**ANDY BURNHAM**

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**MAYOR OF  
GREATER  
MANCHESTER**

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The Rt Hon Thérèse Coffey MP  
Secretary of State for Environment, Food and Rural Affairs  
2 Marsham Street  
London  
SW1P 4DF

14 July 2023

Ref: AB/ HC

Dear Secretary of State,

The attached report was considered by the GM Air Quality Administration Committee on 13 July 2023. The report provides an update on the Case for a new Greater Manchester Clean Air Plan and the impact that government's new evidence and guidance on Selective Catalytic Reduction (SCR) exhaust retrofitting on buses is having on the Greater Manchester Clean Air Plan (GM CAP). As you will be aware, this evidence, which includes a remote sensing monitoring campaign undertaken in Manchester city centre, suggests that bus retrofit is not reducing NOx emissions to the levels expected.

In January 2023, following submission of the Case for a New Clean Air Plan in July 2022 – where Greater Manchester (GM) proposed using the £120 million of Clean Air funding that the Government has awarded 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) – GM was asked by Government to:

- (i) Provide modelling results for a benchmark CAZ to address the persistent exceedances identified in central Manchester and Salford, in order for these to be compared against your proposals.*
- (ii) Identify a suitable approach to address persistent exceedances identified in your data on the A58 Bolton Road in Bury in 2025, and to propose a suitable benchmark.*
- (iii) Set out how the measures you have proposed will be modelled and evidenced overall, and to ensure that they are modelled without any unnecessary delay.*

When we wrote to Minister Pow in February 2023, it was anticipated that the activity for points (i) and (iii) would be concluded by the end of June 2023. The Greater Manchester Authorities supplied the further evidence for point (ii) on 6 March 2023 and were working toward a submission on points (i) and (ii) when we were informed in April 2023 of the Government's emerging new evidence on bus retrofit emissions performance and subsequently, we were provided with new guidance requiring revised emissions modelling to address this.

As you will be aware, buses are an essential component of the public transport offer in Greater Manchester, and in many parts of the region are the only public transport available. When GM submitted its Outline Business Case in 2018 it was made clear that it is vital that action to clean up

the bus fleet does not have the unintended consequence of reducing the number or frequency of bus services in the region.

GM developed a robust retrofit programme based on the government's Clean Vehicle Retrofit Accreditation Scheme (CVRAS) certification system. At present around 1,150 of the approximately 2,000 buses operating in Greater Manchester have been retrofitted to comply with the emissions standards set in the government's Clean Air Zone Framework.

In March 2023 and prior to Government's notification, nearly 90% of GM's Bus Fleet complied with the emissions standards set by the Clean Air Zone Framework, compared with around 10% prior to GM retrofit programme in 2018. Bus retrofit therefore formed a key part of GM's plan to achieve compliance with its duties under The Environment Act 1995 (Greater Manchester) Air Quality Direction 2022 (the Direction).

After informing TfGM of the issue on 19 April 2023, on the 28 April 2023, JAQU provided revised guidance on bus retrofit to local authorities developing their evidence to support a final business case for their CAPs (in essence requiring that any potential air quality benefit of retrofitted buses be disregarded) along with additional guidance specific to GM which allowed for a GM-specific approach to be developed using the available remote sensing monitoring campaign data.

Incorporating this revised guidance into GM's models entails a significant change to the baseline scenario underlying all of GM's modelling work to date, which will need to be updated and agreed prior to testing any measures. There will also be a need to rework the Approach to Address Persistent Exceedances Identified on the A58 Bolton Road, Bury report submitted in March 2023. Notwithstanding this, the GM Authorities are committed to implementing an investment-led plan that delivers compliance with the legal limit value in the shortest possible time and by no later than 2026, in accordance with the Direction, and we are working on potential solutions in parallel with the required updated modelling outlined above.

As you will see from the attached report, bus franchising will enable the integration of the bus network across bus services and with other modes of transport, significantly increasing the efficiency of the network. Critically for the GM CAP, it allows Greater Manchester to invest in buses with the confidence that they have control of the strategic delivery. Crucially, franchising allows TfGM to specify which vehicles are to be used on which routes, meaning lower emitting buses (OEM Euro VI<sup>1</sup> and electric vehicles) may be specified to run on routes with NO<sub>2</sub> exceedances. Alongside development of the GM Clean Air Plan, you will be aware that Greater Manchester is delivering the Bee Network – a high volume, low fare, transport system – and this will be transformational for the city-region.

It will make it much easier for people to travel more affordably and sustainably and it will help us to reduce all types of air pollution, not just nitrogen dioxide, but other pollutants such as fine particulate matter. It will also cut emissions of carbon dioxide. We've made great progress already, including:

- Introduction of new low bus fares - £2 adult single fares, £1 for a child/£5 adult daily fares, £2.50 for a child - which have contributed to a 12% increase in patronage already.
- Investment to upgrade the bus fleet, which includes orders for 270 electric buses, which will be zero emission at the tail pipe – with the first 50 hitting our streets in a little over two months' time.

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<sup>1</sup> Original Equipment Manufacturer – Euro 6

- Operators running the first two phases of franchising have also committed to providing around 200 more electric buses. These will be coming onto our streets over the next two years, with funding secured for even more still and plans for a zero-emission bus fleet by 2032.
- Tranche 1 of bus franchising in Wigan and Bolton going live on 24 September 2023 will have a positive impact on many more places, including Manchester city centre, given the routes those buses will take.
- Operators have also ordered cleaner new Euro VI compliant buses. This includes the purchase of 67 Euro VI buses by Rotala.
- To support the roll out of a new fleet of world-class, environmentally friendly buses, state-of-the-art electric bus depots will be built in Stockport and Central Park in Manchester.
- Delivering the first fully connected cycle network in the UK, connecting every area and community in Greater Manchester with 1,800 miles of safe routes and 2,400 new crossings.
- Work to deliver the largest active travel network in the country also continues, making it easier for people to switch from car journeys to active travel for shorter journeys.
- Over £100m of schemes funded through the Mayor's Cycling and Walking Challenge Fund (MCF) now having Full Business Case Approval.
- Bee Network hire bikes and e-bikes are available in areas of Manchester, Salford and Trafford right now – with ridership recently surpassing 1 million kilometres cycled.
- Across the city-region, schools and colleges continued to receive Active Travel grants in 2022, with over £360,000 now spent on active travel grants across Greater Manchester schools delivering over 1,000 new and improved cycle parking spaces.
- 13 School Streets were delivered in Greater Manchester in 2022, providing cleaner and safer air for our children, and funding is allocated for the introduction of more schemes.
- A new £535K programme, funded through the Department for Transport and Active Travel England Capability and Ambition Fund, means businesses, community groups and other organisations in Greater Manchester can apply for grants to help get more people walking, cycling and wheeling, reducing lorry and van travel in urban areas.
- To support the move towards a cleaner taxi fleet, in 2023, 60 rapid charging points at 32 sites across Greater Manchester are being installed dedicated for EV private hire (PHV) and hackney vehicles licensed by a Greater Manchester Authority.

As set out in the report GM is now:

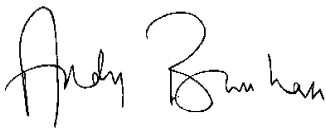
- Working to incorporate the revised JAQU guidance into GM's models;
- Working with JAQU to develop a bespoke approach to model emissions from retrofitted buses, as per JAQU's "Bus Retrofit Update - Additional Technical Guidance for Greater Manchester". This is fundamental to the assessment of a benchmark charging Clean Air Zone scenario, GM's investment-led proposals and additional measures (e.g. locally targeted road traffic management); and
- Determining bus fleet composition and service deployment assumptions for 2025 to incorporate into modelling.

These tasks will take some time to complete, and we are conscious that while GM is undertaking this work Government's programme of research to fully understand the cause(s) of variability on bus retrofit performance, and how performance can be improved, will be still ongoing and is anticipated to be reporting in the Autumn. In addition, GM is aware that a further roadside remote sensing monitoring campaign of bus performance has been undertaken in Manchester to address JAQU's potential concerns about the original study being conducted in November and December

2022 due to the cold weather conditions. GM Authorities are concerned that the outcomes of this research may materially change Government's understanding of bus retrofit. This in turn could lead to additional work, and associated delays, to reflect the outcomes of the research or an increased risk of legal challenge if GM's proposals could be seen as founded on an evidence base that is not accurate or up-to-date.

The GM Authorities are therefore looking to align the reporting of our programmes of work so far as possible given their interdependency. We will continue to work with your officials particularly within JAQU and would be very happy to meet with you to discuss how we deal with this unprecedented issue.

Yours sincerely,



**Andy Burnham**  
Mayor of Greater Manchester



**Eamonn O'Brien**  
Leader of Bury Council & GM Portfolio Lead for Clean Air