

The Rt Hon Steve Reed MP
Secretary of State for Environment, Food and Rural Affairs

The Rt Hon Louise Haigh MP
Secretary of State for Transport

By email

11th October 2024

Dear Secretaries of State,

The attached appraisal reports were considered by the Greater Manchester Air Quality Administration Committee on 1 October 2024. They provide an update on the Case for a new Greater Manchester Clean Air Plan.

Having submitted the Case for a New Clean Air Plan in December 2023, Greater Manchester officers have been in dialogue with the Joint Air Quality Unit (JAQU) to explain the need to update the submission. The update to our December 2023 submission is in response to changes in circumstances and opportunities, including:

- Timescales for electric charging at bus depots; and
- The latest operational bus deployment patterns, service requirements and objectives of Greater Manchester's bus franchising scheme.

The results provide evidence that Greater Manchester's proposed investment-led plan can achieve compliance with legal limits for nitrogen dioxide (NO₂) concentrations in 2026 and that compliance is not achieved in either 2025 or 2026 under a benchmark Category C charging Clean Air Zone in the centre of Manchester and Salford.

Building on the transformational Bee Network, Greater Manchester'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 and Bolton and 77 OEM Euro VI buses.
- £30.5m for a Clean Taxi Fund to support Greater Manchester-licensed owners to upgrade to cleaner vehicles.
- £5m to manage traffic flows on roads in Manchester and Salford.

The bus measures represent the most important mechanism for reducing exceedances under the investment-led plan. Bringing buses back under local control through the Bee Network allows Greater Manchester to run clean and zero emission buses (ZEBs) on routes where they are most needed to improve air quality.

Taxi measures represent an important mechanism for reducing exceedances and an emissions standard, requiring licensed hackney carriages (hackneys) and private hire vehicles (PHVs) to meet minimum emissions standards, is to be adopted by all Greater Manchester Authorities to secure compliance with legal limits.

Since 2018, the trade has been eagerly 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, due to their substantial per-vehicle emissions alongside buses, there is a clear expectation within the taxi community that dedicated funds will be allocated to support their transition to cleaner vehicles.

Greater Manchester Leaders are keen to improve the overall safety, quality, and fairness of PHV services in the city region, ultimately enhancing the experience for passengers across the 10 boroughs and are committed to ensuring that those registered locally are prioritised for this financial assistance, thereby upholding local standards and mitigating the impact of competition from out-of-area licensees. The expectation of funding is resulting in taxi owners delaying upgrading their vehicles and consequently the Greater Manchester taxi fleet being older and more non-compliant (GM-licensed Hackney Carriages remain largely non-compliant (62%) based on June 2023 licensing data).

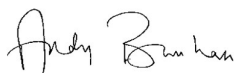
The proposed Clean Taxi Fund will be available only to vehicles licensed with Greater Manchester Authorities, and will provide an incentive for those vehicles to remain with Greater Manchester rather than moving to out-of-area licensing authorities.

Greater Manchester Leaders also request that the government urgently considers agreeing to the removal of the signs installed for a Category C charging Clean Air Zone across the city region, its Boundary Authorities and the motorway network. The appraisal shows that only the investment-led plan meets the legal requirement to deliver compliance in the shortest possible time and by 2026 at the latest, and therefore the signs are no longer required. Their existence causes confusion for the motorist travelling in Greater Manchester.

We would also welcome the opportunity for officials to explore using the Automatic Number Plate Recognition Cameras funded by the government for clean air purposes to also be utilised for law enforcement activity related to the detection of crime by Greater Manchester Police, subject to the consideration of the outcome of public consultation.

Ultimately it is for the government to determine what measures Greater Manchester is to implement. The appraisal shows that only the investment-led plan complies with the requirement placed on the 10 Greater Manchester Authorities to deliver compliance with legal limits for NO₂ on local roads in the shortest possible time and by 2026 at the latest.

Whilst we await your response, we are mindful of our duty to achieve compliance in the shortest possible time and therefore will make preparations to ensure we are able to deliver the proposed investment in zero-emission buses, that a minimum taxi emissions standards will be adopted by all Greater Manchester Authorities, and work with Manchester and Salford City Councils to be ready to deliver the local highway-based measures.



Andy Burnham
Mayor of Greater Manchester



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