

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

The Rt Hon Mark Harper MP
Secretary of State for Transport

By email

22 December 2023

Dear Secretaries of State,

The attached report was considered by the Greater Manchester Air Quality Administration Committee on 20 December 2023 and provides an update on the Case for a new Greater Manchester Clean Air Plan. In the absence of the outcome of the government's bus retrofit study, which was anticipated in Autumn 2023, GM has incorporated revised guidance from JAQU into the modelling underpinning development of its Clean Air Plan. As requested by the government, appraisal of GM's proposed investment-led plan has been undertaken against a benchmark charging Clean Air Zone (CAZ) in the centre of Manchester and Salford.

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

Building on the transformational Bee Network, GM's investment-led plan would target Clean Air funding already awarded by government to invest:

- £51.2m in 64 new zero-emission electric buses and depot electrification in Manchester, Bolton and Middleton.
- £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.

The bus measures represent the most important mechanism for reducing exceedances under the investment-led plan and are grounded in GM's ability to control the emissions standards of vehicles operating on key routes having introduced bus franchising.

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 GM Authorities to secure compliance with legal limits in 2025.

GM Leaders are keen to improve the overall safety, quality, and fairness of PHV services in GM, ultimately enhancing the experience for passengers across the region. In order to do this an element of control is needed over the standards of all taxis operating in GM including those registered outside the area. GM's proposed Clean Taxi Fund will be available only to vehicles licensed with GM authorities, and will therefore provide an incentive for those vehicles to remain with GM rather than moving to out-of-area licensing authorities without emissions standards. However, out-of-area operation already undermines our local licensing regimes. .

The scale of the out-of-area private hire taxi operation in GM has increased significantly during development of the Clean Air Plan, with nearly 4 in 10 private hire vehicles being registered outside of the region, restricting the enforcement capabilities of local licensing authorities as there are limited powers to enforce against out-of-area vehicles.

The government has recognised the challenge that out-of-area working by pre-booked taxi and private hire vehicle drivers can present, and in our Trailblazer Deal has said it is open to working with Greater Manchester Combined Authority to explore potential options which could address these issues provided primary legislation is not required. However it is now clear that primary legislation is the only way to address this issue, so GM are calling upon government to introduce legislation that strengthens local licensing regimes.

GM Leaders also request that the government urgently considers agreeing to the removal of the signs installed for a GM-wide category C charging Clean Air Zone across GM, 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 GM.

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 GM is to implement. The appraisal shows that only the investment-led plan complies with the requirement placed on the 10 GM 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 GM Authorities, and we will work with Manchester and Salford City Councils 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