

## **HIGH PEAK BOROUGH COUNCIL**

### **Public Transport Working Group**

**4 November 2020**

<b>TITLE:</b>	<b>Greater Manchester Clean Air Plan Consultation</b>
<b>EXECUTIVE COUNCILLOR:</b>	<b>Councillor Jean Todd - Executive Councillor for Climate Change, Environment and Community Safety</b>
<b>CONTACT OFFICER:</b>	<b>Mark James – Principal Planning Officer</b>
<b>WARDS INVOLVED:</b>	<b>All</b>

### **Appendices Attached – briefing presentation from Transport for Greater Manchester**

#### **1. Reason for the Report**

- 1.1 To notify Councillors of the current consultation regarding the Greater Manchester Clean Air Plan. Emerging issues for High Peak which may form the basis of a response to the consultation are identified to a view to seeking feedback from Councillors before the response is finalised.

#### **2. Recommendation**

- 2.1 That Councillors note the proposals of the Greater Manchester Clean Air Plan consultation.
- 2.2 That Councillors note the initial list of issues for High Peak that have been identified.
- 2.3 That Councillors delegate responsibility for finalising a consultation response to officers which reflects the issues raised in this report, feedback from Councillors and the outcome of further engagement with local businesses.

#### **3. Executive Summary**

- 3.1 A public consultation on the Greater Manchester Clean Air Plan is open until December 3<sup>rd</sup>. The plan is in response to a legal direction from Central Government to the Greater Manchester Authorities requiring them to tackle Nitrogen Dioxide (NO<sub>2</sub>) emissions due to concerns over exceedances and

associated impacts on public health.

- 3.2 It is proposed that the Clean Air Zone will come into force across most of Greater Manchester in the Spring of 2022. This will require that all commercial vehicles entering the Zone including; buses, vans, HGVs, private hire vehicles and hackney carriages, meet the necessary emission standards for NO<sub>2</sub>.
- 3.3 If the commercial vehicles do not meet the required emission standards, they will be required to pay a daily charge.
- 3.4 Several exemptions and discounts are proposed for certain types of vehicles, alongside a significant fund (currently £41m) to support vehicle upgrades and compliance with the emission standards.
- 3.5 The proposed fund is primarily only going to be open businesses based or registered in Greater Manchester region. So unfortunately, High Peak based businesses and vehicles that are reliant upon regular travel to and from the Clean Air Zone, will have to pay the future charge, but are currently not expected to benefit from the support offered to those based or registered in Greater Manchester. Officers are in the process on engaging with local businesses to determine the implications of the scheme for them.
- 3.6 It is proposed that a response to the consultation is submitted to raise this issue along with the potential for “rat runs” due to the current exclusion of the sections of the A57/A628 operated by Highways England from the charging regime.

#### **4. How this report links to Corporate Priorities**

- 4.1 The Clean Air Plan links to Aim 1 (Supporting our communities to create a healthier, safer, cleaner High Peak), Aim 3 (Protect and create jobs by supporting economic growth, development and regeneration) and Aim 4 (Protect and improve the environment including responding to the climate emergency) of the Corporate Plan.

#### **5. Alternative Options**

- 5.1 Option 1 (recommended) – that the Council responds to the consultation in line with the issues raised in this report and which reflects the feedback from Councillors and local businesses. This option will ensure that issues of relevance to High Peak can be considered.
- 5.2 Option 2 (not recommended) – that the Council does not respond to the consultation. This will not provide the Greater Manchester Combined Authority with sufficient feedback to take concerns specific to High Peak into account.

Neil Rodgers  
**Executive Director (Place)**

## Web Links and Background Papers

Clean Air Plan consultation:  
<https://cleanairgm.com/clean-air-consultation/>

Proposed Clean Air Zone: <https://cleanairgm.com/clean-air-zone-map/>

## Contact details

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## 6. Detail

### Background and scope

- 6.1 Greater Manchester has received a direction from Government to introduce a Clean Air Plan to bring nitrogen dioxide (NO<sub>2</sub>) levels within legal limits in "the shortest possible time and by 2024 at the latest". The ten Boroughs are working together to develop a plan to address this.
- 6.2 The plan aims to remove all roadside concentrations of NO<sub>2</sub> that have been forecast to exceed the legal limits. If the plan is implemented, it is expected that the issue will have been addressed by 2024.
- 6.3 150 stretches of road across Greater Manchester will exceed NO<sub>2</sub> limits unless action is taken. This is a concern due to the significant impact that air quality has on human health with the issue adversely affecting people of all ages from unborn children through to the elderly. NO<sub>2</sub> and particulate matter can contribute towards a range of health conditions such as asthma, coronary heart disease, lung cancer and diabetes.
- 6.4 As the proposals are in response from a legal Government direction to take action, the scope of the consultation is limited. Fixed elements include:
- The requirement for a Category C Clean Air Zone
  - The type of vehicles which should pay a charge
  - The timing of the implementation of the Clean Air Zone in Greater Manchester.
- 6.5 However, the following elements are subject to the consultation and may be subject to change in light of feedback. As such, any response from the Council should focus on these matters:
- Elements of the Clean Air Zone such as the details of the proposed boundary, the proposed daily charge, discounts and exemptions.
  - Supporting measures such as the funds and vehicle finance available to support impacted vehicles.
  - The impacts of the COVID-19 pandemic on the ability of businesses /

organisations to respond to the proposals.

- 6.6 This follows on from previous public consultation undertaken in May / June 2019. At this time, the Borough Council responded by highlighting air quality concerns within High Peak. The response also sought further discussions to explore the potential implications of the Clean Air Zone for local businesses and opportunities for collaboration to address air quality.

### Proposals

- 6.7 Daily charges will apply to all “non-compliant” commercial vehicles that travel within the defined Clean Air Zone (CAZ). One charge would apply per day, with payments made via the Government’s payment portal. Payments will be able to be made up to 7 days in advance or 7 days, retrospectively of the journey. Exemptions and discounts are proposed to certain vehicles or groups. Funding is also to be made available to assist with compliance and in recognition of the economic impacts in some cases. A summary of the key aspects of the proposals is set out below:

#### Clean Air Zone

- 6.8 The CAZ would cover the majority of roads within the 10 Greater Manchester Authorities.

However, currently the Strategic Road Network (motorways and key trunks roads) managed by Highways England, are to be excluded from the zone and exempt from the charges. This includes

- The A57/A628 within Greater Manchester.
- The A555 (Manchester Airport Relief Road) is also proposed to be excluded even though the road forms part of the local highway network. This is because several sections of the road lie within Cheshire East which is not implementing the CAP and it is understood that there are concerns that applying a charge on the A555 would be counter-productive given that it was developed to reduce traffic on the A6 through Stockport where a charge will apply. An interactive map of the CAZ is available online (see link above).

#### Charges, exemptions and enforcement

- 6.9 Private cars and motorcycles would not be liable for a charge. Other vehicles may be liable dependant on whether they comply with European emissions standards. Vehicle compliance and proposed charges are set out in the tables below.

## Vehicle compliance

Vehicle	Age of compliant vehicles
Car (diesel)	2015 (Euro 6)
Car (petrol)	2005 (Euro 4)
Van	2016 (Euro 6)
Bus / HGV	2013 (Euro 6)

## Proposed charges

Vehicle	Daily charge
Buses and coaches	£60
Hackney carriages and private hire vehicles	£7.50
HGVs	£60
Minibuses	£10
Vans	£10

6.10 The Government specifies that the following should be permanently exempt:

- Historic vehicles (registered more than 40 years ago)
- Military vehicles
- Disabled passenger vehicles
- Specialist emergency service vehicles

6.11 In addition to the above, local permanent exemptions are proposed for:

- Specialist HGVs (e.g. recovery vehicles)
- Non road going vehicles (e.g. mobile cranes)
- Emergency services
- Community minibuses
- Showman's Guild vehicles
- Driving within the zone due to road diversions
- Disabled tax class vehicles

6.12 Certain temporary exemptions are also proposed at a local level to apply until 31 December 2022, including non-compliant vehicles with outstanding finance or when delivery of a compliant vehicle is awaited but delayed due to shortage of supply.

6.13 Permanent local discounts are proposed for:

- Private hire vehicles owned or exclusively contracted by 1 person can apply for a discounted charge of 5/7 of the weekly total from 2022. This is only proposed to be available to vehicles registered in Greater Manchester.
- Owners or registered keepers of leisure vehicles (>3.5t) in private ownership can apply for a discounted charge of £10 per day. Again, this would only apply

to vehicles registered to an address in Greater Manchester.

- 6.14 In terms of enforcement, ANPR cameras will be used to identify vehicles that have now paid. A fine of £120 (in addition to the daily charge) will be charged for non-payment. This will be reduced to £60 (plus the daily charge) if paid within 14 days.

#### Timescales

- 6.15 Charging is expected to be introduced in the Spring of 2022 until “at least the second half of 2026”. Once in place, charges would apply 24 hours a day, 365 days a year.

#### Financial support

- 6.16 A range of financial assistance is proposed to support and encourage compliance with the emissions standards. To date, £41m has been made available by Government, from a total request for £150m. Further funding may be confirmed in due course. A summary of available funds is set out below. Unfortunately, the current proposals largely exclude vehicles or businesses in High Peak from accessing the additional funding.

- A Clean Commercial Fund - to provide financial support for the upgrade of non-compliant vehicles which will be targeted to support smaller local businesses, sole traders, individuals and the charity/voluntary sector.
- A Clean Taxi Fund - to provide financial support for the upgrade of non-compliant hackney carriages and private hire vehicles licensed with the Greater Manchester Authorities.
- A Clean Bus Fund - to provide financial support for the upgrade of non-compliant buses registered to run services across Greater Manchester. It is understood that services which originate from outside Greater Manchester but that operate within it (e.g. the 199 Buxton-Manchester Airport service) will be eligible.
- A Hardship Fund to support individuals, companies and organisations who are considered to be the most vulnerable to the potential negative economic impacts.

- 6.17 Furthermore, assistance with vehicle finance is proposed. To support the switch to cleaner vehicles a network of 40 Hackney / private hire vehicle only rapid electric vehicle charging points is to be funded via the CAP.

#### Process

- 6.18 The current consultation is due to close on 3 December 2020. A number of online events for residents and businesses are scheduled to share information about the scheme and answer questions.
- 6.19 The results of the consultation are expected to be published in February 2021 along with an assessment about the impact of Covid-19 on the proposals. The final business case for the scheme will then be published along with the roll out of the financial support packages ahead of the charges commencing in Spring 2022.

#### Issues for High Peak

- 6.20 Based on an initial review of the scheme, it is considered that the main issues for High Peak relate to the impact on local businesses and the owners of other commercial vehicles that will be liable for charge, as well as potential wider implications for air quality and traffic as summarised below.

#### Business impacts

- 6.21 Greater Manchester provides access to key markets for High Peak businesses given its the close proximity. The conurbation also provides essential services and infrastructure for High Peak. Local haulage firms, taxi companies, delivery firms and local tradesman are a few examples of the range of High Peak businesses that are likely to rely upon travel to/from Greater Manchester on a regular basis.
- 6.22 Unless these business operate with compliant vehicles, they will incur additional expenses in the form of a daily charge or to upgrade to a compliant less polluting vehicle. To exacerbate the matter, busses and vehicles in High Peak will be excluded from most of the financial support offered to those inside the Greater Manchester boundary. The only exception to this would appear to be to bus operators.
- 6.23 The scale of this problem is currently unknown as it is dependant on the current vehicle portfolio (compliant or not) and the usual destination of a business. However, it is considered likely that this will be a negative impact on these businesses, particularly smaller businesses. Officers are in the process of liaising with local businesses to gather further information on the likely impact on their operation and the extent to which they may already be compliant with the required emission standards.

#### Air quality and traffic

- 6.24 The exclusion of roads managed by Highways England from the scheme may lead to “rat runs” developing (most notably in the Glossop area), as some commercial vehicles alter their routes to avoid charges ,by using the Strategic Road Network (SRN). This may lead to increased congestion and poorer air quality within these areas of High Peak.

- 6.25 It should be noted that the exclusion of the SRN from the scheme is a restriction currently decided at a national level. Indeed, concerns have been raised by the Greater Manchester authorities on this discrepancy. They have asked the Government to direct Highways England to tackle NO<sub>2</sub> exceedances on the SRN in the same way GM Authorities are having to take action on the local road network.
- 6.26 In particular, Tameside MBC has highlighted to Ministers that the inconsistency in approach is leaving many of their most vulnerable residents unprotected, particularly, around the A628/A57. This route, managed by Highways England, will be left with NO<sub>2</sub> exceedances that are not being addressed, despite the area being declared as part of GM's Air Quality Management Area.
- 6.27 In response, Government ministers have agreed to consider extending Greater Manchester's Clean Air Zone (CAZ) charges to the sections of the A628/A57 which form part of the Strategic Road Network, within the proposed CAZ boundary. The extension of any charges to the A628/A57 will be subject to a full assessment of the potential impacts, to be led by Highways England. This will cover air quality impacts on other roads, safety impacts, carbon impacts, as well as wider issues for Highways England, such as operational and network issues. Following the assessment, ministers will take the final decision on whether or not charging should be implemented on the A628/A57. A conclusion is expected in early 2021.
- 6.28 Furthermore, there is a possibility that commercial operators (either operating with or delivering to High Peak) focus their newer vehicles in the Greater Manchester area and redeploy higher polluting vehicles for journeys solely within High Peak (or other non-charging areas).

### Proposal

- 6.29 In light of the above, it is proposed that:
- A response to the consultation is submitted on behalf of the Council which:
    - Seeks the expansion of financial support and exemptions / discounts to businesses and vehicles registered in High Peak.
    - Highlights the concerns regarding potential rat running and seeks confirmation of the inclusion of the sections of the A57/A628 within the Strategic Road Network.
    - Reflects feedback from Councillors and local businesses following engagement
- 6.30 In addition, a request has been made the Council's Communication team to help raise awareness of the scheme locally and to encourage as many people as possible to respond to the consultation directly. This could also include raising awareness of support that is currently available at a national level to

High Peak business and other organisations to improve the emissions output of vehicles.