

GM Air Quality Administration Committee

Date: 31 July 2025

Subject: GM Clean Air Plan – July 2025 Update

Report of: Cllr Eamonn O'Brien – GM Clean Air Lead

Purpose of Report

This report provides an update on the Greater Manchester Clean Air Plan now that the government has accepted the assessment that an investment-led, non-charging Greater Manchester Clean Air Plan will achieve compliance with nitrogen dioxide levels on the local road network in the shortest possible time.

Recommendations:

The Air Quality Administration Committee is requested to:

1. Note that *The Environment Act 1995 (Greater Manchester) Air Quality Direction 2022* has been revoked and replaced with a new direction on 4th February 2025 *The Environment Act 1995 (Greater Manchester) Air Quality Direction 2025*.
2. Note the update on progress in delivering the GM Clean Air Plan; and the need to adjust some elements of the Bus and Local Measures delivery plans, based on a change in local circumstances.
3. Agree a delegation is made to the Group Chief Executive, GMCA, GMFRS and TfGM, in consultation with the GM Clean Air Lead to approve the final submission of the need to adjust some elements of the Bus and Local Measures delivery to the Government's Joint Air Quality Unit and deal with any supplementary requests from the Joint Air Quality Unit in respect of the change request.
4. Note the Taxi Review Update.
5. Agree to establish and distribute the £8 million Hackney Support Funding on a 'first come first served' basis, with a funding round initially targeting single vehicle owners, as set out in paragraphs 7.11 and 7.13.
6. Note the update on Clean Air Zone signage.

BOLTON
BURY

MANCHESTER
OLDHAM

ROCHDALE
SALFORD

STOCKPORT
TAMESIDE

TRAFFORD
WIGAN

7. Note that TfGM will work with National Highways to reuse one site on the strategic road network on the M62 utilising two existing posts (no sign face), to signpost to Ladywell Metrolink.
8. Note the update on Greater Manchester Police (GMP) taking on the ownership of the Clean Air Funded ANPR cameras; and the proposal to integrate them into their existing ANPR network, thereby changing their primary use to crime detection.
9. Note the proposal to commence a 6-week public consultation on the ANPR Camera Change of Use, from 15th September 2025.
10. Delegate to the Group Chief Executive, GMCA, GMFRS and TfGM, in consultation with the GM Mayor and GM Clean Air Lead, to approve the ANPR Camera Change of Use consultation materials.
11. Note the 2024 GM Clean Air Plan monitoring data indicates that nitrogen dioxide air pollution has seen an overall reduction in nitrogen dioxide exceedances compared to 2023, and a significant improvement to 2019 levels.

Contact Officers

Caroline Simpson – Group Chief Executive, GMCA, GMFRS & TfGM
– caroline.simpson@greatermanchester-ca.gov.uk

Gill Duckworth – GMCA Solicitor and Monitoring Officer –
gillian.duckworth@greatermanchester-ca.gov.uk

Megan Black – Head of Logistics & Environment –
megan.black@tfgm.com

Equalities Impact, Carbon and Sustainability Assessment:

The GM Clean Air Plan is a place-based solution to tackle roadside NO₂ which will have a positive impact on carbon.

Equalities impacts are set out in Section 7.

Risk Management

Risks were set out in the Appraisal Report [Appraisal Report - Approved.pdf](#).

Legal Considerations

The Environment Act 1995 (Greater Manchester) Air Quality Direction 2025 was issued on 4 February 2025.¹

This direction requires that GM takes steps to implement the approved measures in their Clean Air Plan, ensuring that:

- Compliance with the legal limit value for nitrogen dioxide is achieved in the shortest possible time, and by 2026 at the latest;
- Exposure to levels above the legal limit for nitrogen dioxide are reduced as quickly as possible.

The description of the approved measures is as detailed in the appraisal report, 'Evidence Submission for a new GM Clean Air Plan' of the Greater Manchester Authorities dated October 2024, and its supplement, a package of non-charging measures, and specifically includes the following:

- i. Cleaner Buses; provision of Euro VI buses; zero emission buses; charging infrastructure and associated support.
- ii. Local traffic management measures at:
 - a. A57 Regent Road and
 - b. A34 Quay Street/Great Bridgewater Street
- iii. Support for moving the hackney carriage fleet to cleaner vehicles.

¹ [https://assets.publishing.service.gov.uk/media/67b494c73e77ca8b737d380f/Direction - Greater Manchester Non Charging Plan.pdf](https://assets.publishing.service.gov.uk/media/67b494c73e77ca8b737d380f/Direction_-_Greater_Manchester_Non_Charging_Plan.pdf)

The previous direction (The Environment Act 1995 (Greater Manchester) Air Quality Direction 2022) has been revoked.

Financial Consequences – Revenue

Financial consequences were set out in the Appraisal Report [Appraisal Report - Approved.pdf](#), with all development and delivery costs to be covered by central government. A new direction from the government is expected to be issued to the Greater Manchester authorities which will allow TfGM to understand the detailed breakdown of the funding awarded for Development, Administration, Risk & Contingency.

Financial Consequences – Capital

As Revenue Funding above.

Number of attachments to the report: Three

Comments/recommendations from Overview & Scrutiny Committee

Not applicable.

Background Papers

- 5 February 2025, report to AQAC: GM Clean Air Plan – January 2025 Update
- 5 February 2025, report to AQAC: GM Clean Air Plan – Expenditure Update
- 31 January 2025, report to GMCA: GM Clean Air Plan – January 2025 Update
- 1 October 2024, report to AQAC: GM Clean Air Plan – September 2024 Update
- 20 December 2023, Report to AQAC: GM Clean Air Plan – December 2023 Update
- 20 December 2023: Report to AQAC: GM Clean Air Plan – Expenditure Update
- 13 July 2023, Report to AQAC: GM Clean Air Plan – July 2023 Update
- 27 February 2023, Report to AQAC: GM Clean Air Plan – February 2023 Update
- 26 October 2022, Report to AQAC: GM Clean Air Plan – Expenditure Update
- 26 October 2022, Report to AQAC: GM Clean Air Plan – October 2022 Update
- 17 August 2022, Report to AQAC: GM Clean Air Plan – August 2022 Update
- 1 July 2022, Report to AQAC: GM Clean Air Plan – July 22 Update
- 23 March 2022, Report to AQAC: GM Clean Air Plan – March 22 Update
- 28 February 2022, Report to AQAC: GM Clean Air Plan – February 22 Update
- 2 February 2022, report to CACC: GM Clean Air Plan – update to the temporary exemption qualification date for GM-licensed hackney carriages and private hire vehicles
- 20 January 2022, report to AQAC: GM Clean Air Plan – A628/A57, Tameside – Trunk Road Charging Scheme update

- 20 January 2022, report to AQAC: GM Clean Air Plan – Financial Support Scheme Jan 22 Update
- 20 January 2022, report to AQAC: GM Clean Air Plan – Clean Air Zone Discount & Exemptions Applications
- 18 November 2021, report to AQAC: GM Clean Air Plan – GM Clean Air Funds assessment mechanism
- 18 November 2021, report to CACC: GM Clean Air Plan – GM Clean Air Plan Policy updates
- 13 October 2021, report to AQAC: GM Clean Air Plan – Operational Agreement for the Central Clean Air Service
- 13 October 2021, report to CACC: GM Clean Air Plan – Showmen's Vehicle Exemption
- 13 October 2021, report to CACC: GM Clean Air Plan – Clean Air Zone daily charge refund policy
- 13 October 2021, report to CACC: GM Clean Air Plan – A628/A57, Tameside – Trunk Road Charging Scheme
- 21 September 2021, report to AQAC: GM Clean Air Plan – Clean Air Zone: Camera and Sign Installation
- 21 September 2021, report to AQAC: GM Clean Air Plan – Bus Replacement Funds
- 25 June 2021, report to GMCA: GM Clean Air Final Plan
- 31 January 2021, report to GMCA: GM Clean Air Plan: Consultation
- 31 July 2020, report to GMCA: Clean Air Plan Update
- 29 May 2020, report to GMCA: Clean Air Plan Update
- 31 January 2020, report to GMCA: Clean Air Plan Update
- 26 July 2019, report to GMCA: Clean Air Plan Update
- 1 March 2019, report to GMCA: Greater Manchester's Clean Air Plan – Tackling Nitrogen Dioxide Exceedances at the Roadside - Outline Business Case
- 11 January 2019, report to GMCA/AGMA: Clean Air Update
- 14 December 2018, report to GMCA: Clean Air Update
- 30 November 2018, report to GMCA: Clean Air Plan Update
- 15 November 2018, report to HPEOS Committee: Clean Air Update
- 26 October 2018, report to GMCA: GM Clean Air Plan Update on Local Air Quality Monitoring
- 16 August 2018, report to HPEOS Committee: GM Clean Air Plan Update
- UK plan for tackling roadside nitrogen dioxide concentrations, Defra and DfT, July 2017.

Tracking/ Process

Does this report relate to a major strategic decision, as set out in the GMCA Constitution

No

Exemption from call in

Are there any aspects in this report which means it should be considered exempt from call in by the relevant Scrutiny Committee on the grounds of urgency? No

Bee Network Committee – Not applicable

Overview and Scrutiny Committee – Not applicable

GM Clean Air Scrutiny Committee – Not applicable

1 Background

- 1.1 In 2017 the government instructed many local authorities across the UK to take quick action to reduce harmful Nitrogen Dioxide (NO₂) levels following the Secretary of State (SoS) issuing a Direction under the Environment Act 1995. In Greater Manchester, the 10 local authorities, the Greater Manchester Combined Authority (GMCA) and Transport for Greater Manchester (TfGM) are working together to develop a Clean Air Plan to tackle NO₂ exceedances at the roadside, herein known as Greater Manchester Clean Air Plan (GM CAP).
- 1.2 The development of the GM CAP is funded by government and is overseen by the Joint Air Quality Unit (JAQU), the joint DEFRA and DfT unit established to deliver national plans to improve air quality and meet legal limits. The costs related to the business case, implementation and operation of the GM CAP are either directly funded or underwritten by government acting through JAQU and any net deficit over the life of the GM CAP will be covered by the New Burdens Doctrine, subject to a reasonableness test².
- 1.3 The primary focus of the plan is to achieve compliance with the legal limit value for NO₂ in a way that considers the current cost of living crisis and associated economic challenge faced by businesses and residents, through an investment-led approach. The evidence submitted in October 2024³ showed that the Investment-led Plan is the only option tested which meets the legal requirement placed on the 10 GM Authorities to deliver compliance in the shortest possible time and by 2026 at the latest.
- 1.4 The plan set out that, building on the transformational Bee Network, GM'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 & Bolton and 77 OEM Euro VI buses.
 - £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.
- 1.5 The core objectives of the new GM CAP are:
 - To reduce NO₂ concentrations to below the legal limits in the shortest possible time and by 2026 at the latest;

² The new burdens doctrine is part of a suite of measures to ensure Council Tax payers do not face excessive increases. [New burdens doctrine: guidance for government departments - GOV.UK \(www.gov.uk\)](#)

³ <https://cleanairgm.com/technical-documents/#updated-evidence-submission-for-a-new-greater-manchester-clean-air-plan>

- To achieve compliance in a way that is fair to businesses and residents, and does not damage business or cause financial hardship to people in GM; and
 - To ensure the reduction of harmful emissions is at the centre of GM's wider objective for delivering the Bee Network's core objectives.
- 1.6 The 'Case for a new Greater Manchester Clean Air Plan' proposed using the Clean Air funding that the government awarded to Greater Manchester 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). The plan ensures that the reduction of harmful emissions is at the centre of GM's wider objectives.
- 1.7 Having submitted evidence to support Greater Manchester's Investment-led Plan in October 2024⁴, on 23rd January the government confirmed it has accepted the assessment that an investment-led, non-charging Greater Manchester Clean Air Plan will achieve compliance with nitrogen dioxide levels on the local road network in the shortest possible time⁵. As a result, Greater Manchester will not need to implement a charging Clean Air Zone (CAZ).

2 Key Developments Since January 2025

- 2.1 On 4 February 2025 The Rt Hon Steve Reed MP, Secretary of State for Environment, Food and Rural Affairs, and The Rt Hon Heidi Alexander MP, Secretary of State for Transport wrote to Andy Burnham, Mayor of Greater Manchester and Cllr Eamonn O'Brien, GMCA portfolio lead for clean air (Appendix One), issuing a new Direction.
- 2.2 *The Environment Act 1995 (Greater Manchester) Air Quality Direction 2025* was issued. The new direction which requires that the GM local authorities:
- Ensure that the plan for NO₂ compliance is implemented so that –
 - a) Compliance with the legal limit value for nitrogen dioxide is achieved in the shortest possible time, and by 2026 at the latest;
 - b) Exposure to levels about the legal limit for nitrogen dioxide are reduced as quickly as possible
- 2.3 This new direction revokes the direction dated February 2022. The latest Direction can be found here: [Environment Act 1995 \(Greater Manchester\) Air Quality Direction 2025](#).
- 2.4 Schedule 1 of the Direction specifies that in terms of the GM Clean Air Plan, the measures that are approved are as detailed in the appraisal report 'Evidence

⁴ <https://cleanairgm.com/technical-documents/#updated-evidence-submission-for-a-new-greater-manchester-clean-air-plan>

⁵ <https://www.gov.uk/government/news/government-backs-local-plans-for-clean-air-in-greater-manchester--2>

Submission for a new GM Clean Air Plan' dated October 2024 and its supplement, a package of non-charging measures, specifically:

- Cleaner buses, provision of: Euro VI buses; zero emission buses; charging infrastructure and associated support.
- Local traffic management measures at:
 - A57 Regent Road and
 - A34 Quay Street/ Great Bridgewater Street, and additionally
- Support for moving the hackney carriage fleet to cleaner vehicles.

2.5 The Secretaries of State letter confirmed they are to provide up to £86m to support the following elements of our proposal, as they considered these are needed to achieve compliance in the shortest possible time.

- Bus investment for 77 Euro VI buses, 40 zero emission buses and associated charging infrastructure (£51.1m);
- Local traffic management measures in central Manchester (£5m);
- Support to move the hackney carriage fleet to cleaner vehicles (£8m); and
- Administration, delivery, monitoring and other associated costs (up to £21.9m).

2.6 They did not consider the evidence supports a need for the full £30.5m funding proposed for a Clean Taxi Fund. Compliance is still predicted in 2026 without this measure. However, on the basis that aspects of this measure will further provide assurance to meet compliance, £8m is being provided to support moving Greater Manchester's hackney carriage fleet to cleaner vehicles.

2.7 The Secretaries of State letter confirmed that in line with the approval, up to £86m of the unspent funds presently remaining with Greater Manchester authorities from the previous CAZ may be reallocated to support the agreed proposals.

2.8 After reaching an agreement with the government on a non-charging, investment-led plan, the Clean Air Charging Authorities Committee, previously tasked with decisions related to the Greater Manchester Clean Air Zone, will be removed from the list of committees on the Greater Manchester Combined Authority website as it is no longer required.

3 Bus Investment

3.1 Work is ongoing to implement the Bus Measures.

3.2 So far, 20 out of 40 ZEBs are operating in Bolton, with 20 dual chargers installed. Additionally, 77 new OEM Euro VI buses were integrated into the GM fleet through Bus Franchising.

3.3 Due to complexities around the Grade II listed depot structure at Queens Road, it is now not expected to be electrified in the timescales required for the Clean Air Plan.

- 3.4 Following conclusion of a desktop-based review using the bus fleet data, GM CAP modelling suite and 2024 air quality monitoring data GM have developed a bus-based alternative to electrification of the Queens Road bus depot resulting in a need to adjust the Investment-led Plan. This will still achieve compliance with the legal direction.
- 3.5 Discussions with JAQU are underway to enter a change control process as detailed in Section 5.

4 Local Traffic Measures

- 4.1 Manchester and Salford City Councils are delivering the Investment-led Plan local measures outlined in the October 2024 Appraisal Report.
- 4.2 Salford City Council have undertaken a yellow box enforcement stakeholder consultation⁶, and have also issued their speed limit consultation notice⁷ although inclusion of average speed cameras not to be included in the plan. Plans for signal optimisation on Regent Road are also being developed and finalised.
- 4.3 Updated modelling has shown that the St John's Area Local Measures are no longer required to achieve compliance at A34 Quay Street in 2026.
- 4.4 Manchester City Council is finalising designs and preparing to consult on yellow box enforcement but will not continue with the prohibition of driving on Lower Byrom Street.
- 4.5 These changes also trigger an adjustment to the Local Measures, which GM is discussing the above with JAQU in the context of the change control process as detailed in Section 5 below.

5 Change control

- 5.1 JAQU has acknowledged that local authorities may need adjustments to their clean air plans based on practical experience or changing circumstances.
- 5.2 GM has raised the need for a change request relating to the approved measures focusing on bus investments and local traffic measures.
- 5.3 The GM Change Control will include the following revisions which will still ensure compliance in the shortest possible time, and by 2026 at the latest.
- 5.4 Removing the following from the JAQU funding request:
 - 77 new Euro VI buses
 - Queens Road depot electrification

⁶ [Project: Yellow box junction cameras along Regent Road a... | Salford City Council](#)

⁷ [Regent Road and Alan Henning Way area•Salford City Council](#)

- Bus service relocation from Bolton to Wigan
- St John's Area local measures, prohibition of driving on Lower Byrom Street.
- Average speed cameras on A57 Regent Road

5.5 And adding the following:

- 38 ZEBs for Bolton depot
- Bolton depot electrification (including supporting vehicle chargers)
- Additional operational costs for Free Bus charging
- Additional operational costs for bus fleet deployment

5.6 All these measures proposed in the change control can be funded within the agreed JAQU funding award.

6 Supporting the GM Taxi Trade

- 6.1 Greater Manchester leaders recognise the importance of financial support for the licensed trade and are committed to ensuring that those registered locally have access to financial assistance, thereby upholding local standards and mitigating the impact of competition from out-of-area licensees.
- 6.2 Current licensing legislation means that vehicle owners are not required to obtain a licence from the local authority where they operate, severing the link between drivers and the people and places they serve.
- 6.3 Department for Transport figures show that more than 11% of England's private hire vehicles are licensed by one local authority, City of Wolverhampton Council, up from below 0.5% less than a decade ago. In Greater Manchester, for example, nearly half (49%) of private hire vehicles are now licensed by authorities outside of its ten councils. The city-region's 'out of area' figure of more than 12,000 has risen sharply from just under 7,000 in 2023.
- 6.4 The 'Backing our taxis: Local. Licensed. Trusted' Campaign, launched at a roundtable with the taxi trade in April, is calling for the government to introduce new powers to Mayoral Combined Authorities for granting licenses and enforcing conditions to address out of area licensing.
- 6.5 In addition, Baroness Casey's National Audit on Group-based Child Sexual Exploitation and Abuse⁸ has made a recommendation to close the legal loophole that means PHV drivers can apply for a licence anywhere in the country.

⁸ [National Audit on Group-Based Child Sexual Exploitation and Abuse](#)

- 6.6 Until the government confirms how it is to legislate this change, GM will continue to advocate for the swift implementation of a system that is safe, fair, and locally controlled.
- 6.7 The April roundtable also saw Greater Manchester leaders recognise the importance of financial support for the licensed trade and reiterated their commitment to ensuring that those registered locally have access to financial assistance, thereby upholding local standards and mitigating the impact of competition from out-of-area licensees. They endorsed maintaining consistent emission standards across GM Authorities and endorsed extending the emission compliance date to 31 December 2026, with exemption to the emission standard until the maximum age limit of the relevant licensing authority (or, for those without an age policy, until 31 August 2030).
- 6.8 Leaders also endorsed a review into how GM can realise its vision for taxis in the existing framework / without legislative change. The primary activity for engagement with the trade during the review has been through an online survey distributed to licensees (c.15,000) through GM taxi licensing managers, and via in-person surveys conducted at LA Council Officers and in-depth interviews with trade representatives. The online survey was hosted on GMConsult and sought views on matters including the following:
- **Hackney Owners:** The proposal to allocate the £8 million Clean Air funding on a first-come, first-served basis, using the existing per vehicle funding of grants of up to £12,560, with views sought on alternative proposals.
 - **PHV Owners:** The proposal to offer financial assistance using GM funding in the form of either a £1,000 grant or a £5,000 0% interest rate loan repayable over five years to enable PHV owners to upgrade their vehicles to a compliant standard.
 - **Integration with the Bee Network:** GM establishing an 'Industry Working Group' as a trade body to advise the Bee Network Committee on how taxis can better align with the ambitions of the Bee Network.
 - **Making GM licensing more attractive:** how taxi licensing in GM could be administered more effectively and made more attractive.
 - **Incentives:** incentives GM could offer to make licensing, in the city-region more attractive
- 6.9 5,243 responses were received from the survey. Trade focus group sessions held for Hackney, PHV, Unions and Operators (e.g. Uber). Member and Officer sessions were held with each local authority. Benchmarking and officer interviews have been undertaken with Transport for London, City of Wolverhampton Council, Sefton Metropolitan Borough Council, Liverpool City Council, and Leeds City Council.

- 6.10 A report on the review will be submitted to the GMCA in the Autumn, presenting trade perspectives and recommendations, including the proposal to offer financial assistance to PHV owners. Views regarding the Hackney Fund are however being brought forward, and are detailed in Section 7 below.

7 Views on Hackney Funding

- 7.1 The Greater Manchester Authorities are offering financial support – a non-repayable grant – through the GM CAP to support hackney carriage vehicle owners to move to cleaner vehicles.
- 7.2 The intention is to offset some of the additional costs that applicants face by their next vehicle upgrade being brought forward as a result of improving emission standards in licensing requirements. These grants are designed to partially offset the expense rather than fully covering the cost. A summary is provided below.
- 7.3 As of January 2025, 1,063 hackney vehicles (59%) registered between 1999 and 2015, are non-compliant—many exceeding the 15-year age limit and awaiting Greater Manchester's funding decision.
- 7.4 262 respondents to the taxi review survey were from hackney vehicle licensees who currently own a non-compliant vehicle. Their responses can be summarised as:
- **Funding Distribution:** 34% of hackney vehicle licensees favoured a first-come, first-served grant approach, while 29% preferred equal distribution with reduced amounts. Others favoured alternative improvements eg improved EV charging (13%) or were undecided (13%). 11% 'Other' i.e they suggested an alternative form of distribution. From those that responded 'Other', there was no clear suggestion as to how the funding should be distributed.
 - **Vehicle Upgrade Preferences:** Most respondents (59%) intend to use funding to upgrade to second-hand petrol/diesel wheelchair accessible vehicles (WAVs), with 23% opting for second-hand electric vehicles (EVs). 8% didn't know which vehicle they would upgrade to. The remaining 11% suggested that they would upgrade to a non-WAV EV or petrol/diesel. The smaller proportion of non-WAV upgrades reflects the requirement that most GM licensing authorities have in place, requiring Hackney Carriages to be WAVs.
- 7.5 In addition to views from Hackney vehicle licensees, views were also sought from drivers, taxi industry representatives, trade unions, taxi operators, GM officers and members.

- 7.6 There was a general view that the funding level was insufficient, with many highlighting that vehicle costs have risen since the Clean Air Taxi scheme was first proposed. Delays in launching the scheme has resulted in drivers delaying upgrading their vehicles until there was clarity on the future of the scheme. Some drivers sought retrospective support for vehicle upgrades that they had already made. Many BAME drivers requested interest-free loans for religious reasons. Concerns were also raised about future Wheelchair Accessible (WAV) taxi availability and its impact on disabled users.
- 7.7 The pros and cons of opening the fund as is, splitting it equally, or pursuing further policy development have been evaluated to determine next steps.

Option	Pros	Cons
1. Open Hackney Taxi in line with previously agreed vehicle funding amounts, on a 'first come first served' basis.	<ul style="list-style-type: none"> • Responds to feedback stating frustrations about the delays and changes to the conditions. • Consultation risk low – no consultation assumed – per-vehicle funding closest alignment to the Previous GM CAP CTF which went to public consultation. • Reduces risk of JAQU funding clawback – funding distribution is in-line with GM evidence submission and funding award. • Reflects broad consensus from officer / member interviews that the proposals are reasonable in terms of focusing the money on Hackneys, where the cost of upgrading is higher. • A fund could open for applications in November. 	<ul style="list-style-type: none"> • Does not respond to those who did not favour 'first-come, first-served' approach. • Does not have a vehicle finance option as a grant payment in arrears.
2. Divide fund equally	<ul style="list-style-type: none"> • Responds to feedback in favour of 'reducing funding and dividing equally'. • Would provide all non-compliant vehicle owners funding to upgrade. 	<ul style="list-style-type: none"> • Further consultation likely required. • With consultation would delay the fund opening and creating a risk that there would be insufficient time for taxi licensees to respond to emission standards. • Removes the funding incentive to upgrade to ZEC vehicles.

Option	Pros	Cons
		<ul style="list-style-type: none"> Assumes all vehicle owners will remain licenced in GM (age profile). Does not have a vehicle finance option
3. Undertake further policy development for Hackney Taxi Fund	<ul style="list-style-type: none"> Responds to feedback for those not in favour of 'first-come, first-served' approach. Would potentially allow for either more per-vehicle funding or providing funding for every eligible vehicle. 	<ul style="list-style-type: none"> Further consultation v. likely required. Would delay the fund opening and creating a risk that there would be insufficient time for taxi licensees to respond to emission standards. There may be further risks and challenges which are not realised until an alternative proposal has been fully developed.

7.8 An Equality Impact analysis indicates that older, male, ethnic minority, and low-income vehicle owners may experience negative impacts in having to meet the revised emission standards and may have affordability challenges in upgrading their vehicle.

7.9 Mitigations include vehicle age exemptions, offline application support, GM Growth Company business support, encouraging vehicle manufacturers to provide Sharia-compliant finance products.

7.10 Mitigations Considered and Discounted

- Interest-free or alternative finance products: Applicants can access Sharia-compliant vehicle finance through third-party providers.
- Re-implement accredited dealerships aspects of the original 2021 scheme: Would take time and past feedback from the Taxi trade cited the limited accredited dealerships as being a prohibitor to owners upgrading their vehicles.
- Re-implement GM panel of lenders in line with original 2021 scheme: GM panel was unable to deliver the advantageous interest rates. Vehicle owners can get the same or better interest rates on vehicle loans on the retail lending market. The 2021 panel was a 4-year framework that cannot be extended without a further re-procurement.
- Additional funding: Government funding is set at £8 million for upgrading Greater Manchester's hackney carriage fleet and supporting compliance. It is not currently proposed to allocate any additional local funding for Hackneys.

- Increasing individual grant funding levels: Discounted because it would lower the number of vehicle owners able to receive support and further policy development would create a risk that there would be insufficient time for taxi licensees to respond to emission standards.

- 7.11 It is recommended to establish and distribute the Hackney Support Funding (Option 1) using the eligibility criteria and funding distribution in line with the GM evidence submission and funding award with a funding round initially targeting single vehicle owners.
- 7.12 Hackney carriages offer valuable transport services to GM residents and these vehicles need to be a safe and reliable part of the transportation network for the wider community. A shift to cleaner compliant vehicles has a positive impact across the nine protected characteristics⁹, improving air quality for everyone, with some groups disproportionately benefiting more than others.
- 7.13 It is also recommended to include a round of funding for retrospective applications for eligible owners or registered keepers of replacement compliant hackney vehicles purchased on or after 23 January 2025 (when the government agreed GM's investment-led Clean Air Plan).
- 7.14 This per-vehicle funding and eligibility approach is consistent with the previous GM CAP Clean Taxi Fund, and is set out in Appendix Two, which was subject to public consultation.
- 7.15 The GM Authorities would collaborate with the GM Growth Company to oversee the administration of the grant funding process. It is anticipated that a fund could open for applications in November 2025.
- 7.16 Once opened GM would keep the uptake of the funding under review and advise the Committee of any significant changes required to the scheme required to ensure the success of the initiative in achieving the transition to cleaner vehicles.

8 Signage

- 8.1 The Group Chief Executive of GMCA, GMFRS, and TfGM, along with the Clean Air Lead, approved the release of funds for Greater Manchester Local Authorities to use the Clean Air Signage contract for removing or repurposing signs.
- 8.2 Bolton, Rochdale, Salford, Stockport, Tameside, Trafford and Wigan, are to undertake work in their areas. Bury, Manchester, Oldham, and eight neighbouring authorities signs will be decommissioned through the existing signage contract with McCann & Co Ltd.

⁹ The nine protected characteristics under the Equality Act 2010 are: Age, Disability, Gender reassignment, Marriage and civil partnership, Pregnancy and maternity, Race, Religion or belief, Sex, Sexual Orientation.

- 8.3 National Highways is responsible for managing the Strategic Road Network signage. They have identified 39 locations on the network where signs were installed or planned. One site on the M62, which consists of two existing posts but has no sign face, has been identified as potentially reusable for signposting to the Ladywell Metrolink Park and Ride site.

9 Automatic number plate recognition (ANPR) cameras

- 9.1 To date 398 Clean Air funded cameras have been installed across Greater Manchester.
- 9.2 GMP have determined that they wish to take over the majority of installed and uninstalled GM ANPR cameras. To demonstrate the technical feasibility of integrating the GM CAP ANPR cameras with GMP's ANPR service solution, compatibility testing has taken place. GMP has confirmed that high-quality images are reaching their back-office system, with manual checks showing a 100% capture rate.
- 9.3 The Surveillance Camera Code of Practice confirms that any change to the purposes for which a surveillance camera system was established and images and information are collected should be subject to consultation before any decision is taken.
- 9.4 The proposal to enable consultees to respond to a change of use is:
- Greater Manchester Police take on the ownership of the Clean Air funded ANPR cameras and integrate them into their existing ANPR network, thereby changing their primary use to the purpose of crime detection.
 - GMP to share data with TfGM to support transport planning and Clean Air Plan Monitoring and Evaluation. TfGM will not access live data from the ANPR cameras.
- 9.5 It is proposed to commence a 6-week consultation on the ANPR Camera Change of Use on 15th September 2025.
- 9.6 The consultation material and engagement activity will use the GMCA visual identity and will be coordinated by the Safer & Stronger Communities team.

10 Nitrogen Dioxide (NO₂) Monitoring Results 2024

- 10.1 Greater Manchester publishes its Air Quality data annually in June each year via the Air Quality Annual Status Report, submitted to DEFRA.
- 10.2 Since 2018, the Greater Manchester Clean Air Plan has been using diffusion tube monitoring equipment to measure roadside levels of NO₂, helping to provide a clearer picture of NO₂ levels in Greater Manchester.

- 10.3 In 2024, 270 roadside monitoring locations showed that there were 38 sites of exceedance, a further 73 locations were at risk of exceedance, and this was consistent with the air quality modelling that was used to inform the location of monitoring. The GM CAP monitoring data indicates that air pollution has generally decreased compared with 2023.
- 10.4 The 2024 GM Clean Air Plan monitoring data indicates that nitrogen dioxide air pollution has seen an overall reduction in nitrogen dioxide exceedances compared to 2023, and a significant improvement to 2019 levels.
- 10.5 Full results can be found in Appendix Three.
- 10.6 **Why does Greater Manchester monitor Nitrogen Dioxide?**
- 10.7 Greater Manchester undertakes NO₂ monitoring to determine compliance with NO₂ legal limit values in accordance with GM CAP and government Direction and the 10 districts also monitor NO₂ in accordance with the requirements of the Environment Act 1995 and associated statutory guidance, also called Local Air Quality Management or 'LAQM'. The two monitoring regimes have different siting criteria to assess exposure in different types of locations.
- 10.8 **What are the legal limit values for Nitrogen Dioxide?**
- 10.9 The GM CAP monitoring assesses exposure as defined by the Air Quality Standards Regulations (England) 2010 Limit Values, with roadside being typically worst-case and hence the focus for monitoring. The LAQM monitoring is concerned with exposure at locations of relevant public exposure¹⁰ where the Air Quality Objectives apply, which can include the roadside but only in exceptional circumstances. LAQM monitoring also includes measurements at background¹¹ and industrial locations and is not limited to road traffic sources.

¹⁰ All locations where members of the public might be regularly exposed. Building façades of residential properties, schools, hospitals, care homes etc. Kerbside locations are on the whole excluded, unless members of the public are likely to be exposed for longer than the time used to determine the legal limit for the pollutant concerned. Box 1.1 for TG16 give more detail [LAQM-TG16-April-21-v1.pdf \(defra.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/68444/LAQM-TG16-April-21-v1.pdf)

¹¹ Background sites are used to provide useful information such as long-term trends, general population exposure and an indication of reduction in pollution away from roadside sources, as opposed to measuring exceedances.

- 10.10 Additionally, the two regimes have different values by which they determine an exceedance. LAQM determines that the legal limit of $40\mu\text{g}/\text{m}^3$ has been exceeded by any result over $39.9\mu\text{g}/\text{m}^3$ ¹², whereas for the GM CAP, JAQU determine anything over $40.4\mu\text{g}/\text{m}^3$ to be an exceedance¹³. These differences in definition should be taken into consideration when comparing the results from individual monitoring locations. There are two legal limits in relation to NO_2 :
- A short-term hourly limit of $200\mu\text{g}/\text{m}^3$ (not to be exceeded more than 18 times a calendar year).
 - The long-term annual average limit of $40\mu\text{g}/\text{m}^3$.
- 10.11 To determine compliance with the NO_2 1-hour mean Air Quality Limit Values, research undertaken on behalf of Defra and outlined in Technical Guidance Note LAQM.TG (16) (Defra, 2021) identified that road traffic emission related exceedances are unlikely to occur where the annual mean concentration is below $60\mu\text{g}/\text{m}^3$.
- 10.12 For the purpose of the GM CAP, the government has directed GM (and other areas) under the Environment Act 1995 to address NO_2 exceedances at the roadside in the shortest possible time. In GM this direction specifically focuses on the long-term annual average legal limit ($40\mu\text{g}/\text{m}^3$).
- 10.13 **How do we monitor Nitrogen Dioxide?**
- 10.14 The GM local authorities carry out air quality monitoring for NO_2 using a combination of:
- Continuous automatic monitoring sites: There are currently 21 continuous air quality monitoring stations, 14 of which are located at the roadside.
 - Diffusion tubes: 383 sites are set up for local air quality management (LAQM) purposes. In addition, approximately 270 sites are set up for GM Clean Air Plan monitoring and evaluation purposes.

¹² An exceedance defines a period of time during which the concentration of a pollutant is greater than, or equal to, the appropriate air quality criteria. For Air Quality Standards, an exceedance is a concentration greater than the Standard value. For Air Pollution Bandings, an exceedance is a concentration greater than, or equal to, the upper band threshold. <https://uk-air.defra.gov.uk/air-pollution/glossary#E>

¹³ The IPR guidance underpinning the Air Quality Standards Regulations 2010 stipulates that compliance should be assessed using data of 'the same numeric accuracy' as the limit value, therefore a value of $40.4\mu\text{g}/\text{m}^3$ is rounded down to $40\mu\text{g}/\text{m}^3$ and is not exceeding. https://ec.europa.eu/environment/air/quality/legislation/pdf/IPR_guidance1.pdf

10.15 Monitoring for NO₂ for GM Clean Air Plan purposes uses diffusion tubes at sites where “target determination”¹⁴ modelling predicted illegally high levels of NO₂ for 2021. Three new continuous automatic air quality monitoring stations were in 2022.







¹⁴ The government’s Joint Air Quality Unit undertook a process called ‘target determination’, which involves comparing the outputs of the local and national modelling, verifying the local modelling methodology and then agreeing the forecast concentration assessment to be compared to the limit value for each exceedance. The outcome of this is an agreement of the NO₂ problem Greater Manchester must resolve (“target determination”) and the basis for the Greater Manchester Clean Air Plan.




11 Appendices - Attached as supplementary papers

11.1 Appendix One: SoS letter to GM Mayor and Clean Air Lead – 31 January 2025

12 Appendix Two – Hackney Support Funding & Proposed Eligibility criteria

- 12.1 In December 2023, following research and engagement, the GM Authorities revised the funding amounts which were increased to reflect inflation as set out in the table below, funding for compliant Internal Combustion Engine vehicles to upgrade to an electric vehicle to increase availability of second-hand compliant Hackney Carriages for purchase and the award of funding was changed to be given directly to applicants rather than through accredited dealerships.
- 12.2 Changing the proposed approach to provide funding directly to applicants, as opposed to the use of a list of accredited dealerships, would remove additional vehicle supply constraints imposed by the fund administration to an industry which, according to the feedback received in engagement and research undertaken in 2022, was facing existing constraints to upgrade their vehicle.

Vehicle type (upgrade to)		Offer available (per vehicle)	Change from previous policy funding amount (2021)
Purpose-built Wheelchair Accessible Vehicle	Zero Emission Capable (ZEC)	Up to £12,560 towards the running costs of the replacement vehicle (or vehicle finance).	 Increase of £2,560
	Second-hand ZEC	Up to £12,560 towards the cost of the replacement vehicle.	 Increase of £2,560
	Compliant Vehicle (Euro 4 petrol or Euro 6 diesel or better)	Up to £6,280 towards the cost of the replacement vehicle.	 Increase of £1,280
	Compliant Vehicle (Retrofit)	No retrofit option to be offered given Government's evidence on efficacy of retrofit technology.	 Removed
Non-Wheelchair Accessible Vehicle	ZEC	Up to £7,530 towards the running costs of the replacement vehicle (or vehicle finance).	 Increase of £1,530
	Second-hand ZEC	Up to £7,530 towards the cost of the replacement vehicle (vehicle finance).	 Increase of £1,530

Vehicle type (upgrade to)		Offer available (per vehicle)	Change from previous policy funding amount (2021)
	Compliant Vehicle 6+ seater (Euro 4 petrol or Euro 6 diesel or better)	Up to £6,280 towards the cost of the replacement vehicle (grant or vehicle finance).	 Increase of £1,280
	Compliant Vehicle (Euro 4 petrol or Euro 6 diesel or better)	Up to £3,770 towards the cost of the replacement vehicle (grant or vehicle finance).	 Increase of £770
	Compliant Vehicle (Retrofit)	No retrofit option to be offered given Governments evidence on efficacy of retrofit technology.	 Removed

12.3 Hackney applicants to the fund will be expected to meet eligibility criteria. This requires demonstration that:

- Applicants are the owner or registered keeper of the non-compliant and replacement compliant vehicle.
- The non-compliant vehicle is licensed for the purposes of Hackney Carriage service with one of the 10 GM Authorities and was licensed with one of them on 1st October 2024.
- The non-compliant vehicle is replaced by a compliant vehicle to meet GM CAP emissions standards.
- The non-compliant vehicle on the 23rd January 2025 was taxed, insured and licensed with one of the 10 GM Authorities. (A non-compliant vehicle that has upgraded to a compliant vehicle between the 1st October 2024 and the 23rd January 2025 is not eligible for Clean Taxi Funding.)
- The replacement compliant vehicle is taxed, insured and licensed with one of the 10 GM Authorities.
- Applicants declare that they will remain licensed with one of the 10 GM Authorities for the purposes of performing Hackney Carriage duties within GM for two years following the receipt of funding.
- Applicants have not received and do not expect to receive more than £315,000 (or equivalent) of domestic or international funding/subsidy from any government/public sources over a period of three fiscal years. This figure is inclusive of any financial benefit from discounts, exemptions, grants or vehicle

finance secured through the GM CAP or any other applicable public funding source.

- Only one grant payment per vehicle is permitted with the exception of the running cost grant which is split into two payments.

12.4 Funding rounds based on the size of business will be applicable.

- an initial round of funding open to eligible owners/registered keepers of a non-compliant hackney vehicle, with a limit of one vehicle per Applicant; and
- a second round of funding open to:
 - eligible owners/registered keepers of a non-compliant hackney vehicle, up to the vehicle cap (up to a total of 5 vehicles per Applicant).
 - eligible owners/registered keepers of a replacement compliant hackney vehicle purchased on or after the 23rd January 2025.

12.5 A Funding Award Notice will be issued to successful applicants and remain eligible for use for 4 months. Applicants will be requested to select their upgrade choice at the point of application.

12.6 A lump sum grant will be payable to the applicant in arrears following the submission of compliant vehicle licenced with GM Authority. * direct arrangement with vehicle manufacturers and FCA lenders will be considered.

12.7 Like-for-like replacement: Like-for-like policy to apply. Flexibility of upgrade from a non-WAV Hackney Carriage to a WAV Hackney Carriage is permitted, with the financial support based upon the vehicle being upgraded to. Replacing a non-compliant WAV Hackney Carriage with a non-WAV Hackney Carriage will not be permitted.

12.8 Grants to be issued directly to the applicant, subject to passing checks. Lump sum grants to be paid by BACs after the replacement vehicle is licensed. A running cost grant will be paid in two staggered payments.

12.9 Trade-in of the existing vehicle: Vehicle owner would source replacement compliant vehicle, delicense their existing vehicle and license replacement vehicle. Value of the sale of the existing vehicle may be used to purchase the compliant vehicle.

13Appendix Three – Nitrogen Dioxide (NO₂) Monitoring Results 2024

13.1 Table 1 below summarises NO₂ concentrations and exceedances of the annual mean objective (AMO) across sites set up for local air quality management (LAQM) purposes (automatic and non-automatic) across GM in 2024.

13.2 Maps showing the location of the LAQM monitoring sites are provided on the CleanAirGM Data Hub.

Table 1 Summary of LAQM NO₂ monitoring in GM in 2024

Authority	Automatic sites (with valid data capture 2023) ¹⁵	Non-automatic sites (locations)	Concentration range (all sites) (µg/m ³)	Exceedances of NO ₂ Annual Mean (non-automatic sites)		Increase / Decrease of Exceedances from 2023
				In AQMA	Outside AQMA	
Bolton MBC	1	54 (49)	31.6 - 9.1	-	-	-1
Bury MBC	3	22 (20)	36.4 - 16.7	-	-	-
Manchester CC	3	33 (27)	51.3 - 13.9	2	-	0
Oldham MBC	1	32 (30)	41.3 - 13.3	1	-	-1
Rochdale MBC	1	29 (27)	35.0 - 9.4	-	-	-
Salford CC	3	53 (45)	38.9 - 9.7	-	-	-2
Stockport MBC	2	34 (29)	32.6 - 5.9	-	-	-
Tameside MBC	2	55 (53)	38.4 - 8.5	-	-	-3
Trafford MBC	3	21 (14)	25.4 - 9.5	-	-	-
Wigan MBC	2	50 (48)	40.7 - 13.4	1	-	-1
Total	21	383 (342)	51.3 - 5.9	4	0	-8

13.3 Table 2 shows the number of diffusion tube monitoring sites.

Table 2 Number of GM CAP Monitoring Sites

Authority	Number of monitoring Sites						
	2018	2019	2020	2021	2022	2023	2024
Bolton	5	14	14	14	32	19	19
Bury	5	16	16	16	36	19	20
Manchester	20	91	91	91	160	109	123
Oldham	0	9	9	9	19	13	10
Rochdale	0	12	12	12	15	6	6
Salford	5	27	27	27	60	32	31

¹⁵ >25% (3 months or more) data capture.

Stockport	10	19	19	19	47	24	22
Tameside	5	14	14	14	32	19	19
Trafford	5	14	14	14	18	4	4
Wigan	0	6	6	6	13	3	4
Total	55	222	222	222	432	248	270

13.4 Table 3 below summarises NO₂ concentrations and exceedances of the annual mean across sites set up for GM CAP purposes between 2018 and 2024. Maps showing the location of the GM CAP monitoring sites are provided on the CleanAirGM Data Hub.

Table 3 Number of GM CAP Exceedances

	Number of Exceedances (>40.4µg/m³)						
Authority	2018	2019	2020	2021	2022	2023	2024
Bolton	1	4	1	2	4	2	0
Bury	2	10	0	2	6	3	0
Manchester	14	65	8	25	49	39	31
Oldham	0	5	0	1	5	1	1
Rochdale	0	4	1	1	1	0	0
Salford	1	16	0	7	13	4	0
Stockport	6	15	2	3	8	7	3
Tameside	4	6	4	4	8	7	2
Trafford	1	3	0	0	0	0	0
Wigan	0	1	0	0	1	1	1
Total	29	129	16	45	95	64	38