

GM Air Quality Administration Committee

Date: 29 January 2026

Subject: GM Clean Air Plan – January 2026 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. It details progress on the investment-led, non-charging Plan, including bus fleet electrification, local traffic measures, distribution of hackney carriage support funds, removal of CAZ signage, the outcome of a consultation to transfer of Clean Air Zone ANPR cameras to Greater Manchester Police for crime detection and the Performance Management Plan.

Recommendations:

The Air Quality Administration Committee is requested to:

1. Note the update on progress in delivering the GM Clean Air Plan; and the agreement of JAQU to adjust some elements of the Bus and Local Measures.
2. Approve the GM CAP Performance Management Plan.
3. Note the latest position on the distribution grants through the Hackney Support Fund.
4. Note the latest position on the consideration of Private Hire Vehicle Support Funding.
5. Note the update on Clean Air Zone signage removal.
6. Note the outcome of the CAZ ANPR change of use consultation.
7. Agree 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, noting GMP will share data with TfGM to support transport planning and Clean Air Plan Monitoring and Evaluation and TfGM will not have access to live data from the ANPR cameras.

8. Agree a delegation to the Group Chief Executive, GMCA, GMFRS and TfGM, in consultation with the Mayor and GM Clean Air Lead to approve the final arrangements, including the implementation Data Protection Impact Assessment, to complete the ownership transfer of the ANPR cameras from TfGM to GMP.

Contact Officers

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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.

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::

- 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.

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.

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)

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.

Financial Consequences – Capital

As Revenue Funding above.

Number of attachments to the report: Three

Comments/recommendations from Overview & Scrutiny Committee

Not applicable.

Background Papers

- 28 November 2025, report to GMCA: GM Taxi Review: Trade Engagement and Licensing Model
- 31 July 2025, report to AQAC: GM Clean Air Plan – July 2025 Update
- 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
- 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 Poor air quality has a real and significant effect on people's health. Air pollution is the largest environmental risk linked to deaths every year. Pollutants such as NO_x, principally NO₂, and PM (PM_{2.5} and PM₁₀) that are not visible to the naked eye are found at harmful levels in many urban areas across the UK and particularly on busy roads.
- 1.2 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).
- 1.3 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.
- 1.4 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.
- 1.5 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;
 - 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.

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 \(www.gov.uk\)](https://www.gov.uk/government/news/new-burdens-doctrine-guidance-for-government-departments)

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

- 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 2025 the government confirmed it 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).
- 1.8 On 4 February 2025 *The Environment Act 1995 (Greater Manchester) Air Quality Direction 2025* was issued. 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).
- 1.9 In July 2025, the committee noted 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. A Change Control⁶ was submitted to government on 29 August 2025. The GM Change Control included the following revisions which will still ensure compliance in the shortest possible time, and by 2026 at the latest.
- 1.10 Removing the following from the JAQU funding request:
- 77 new Euro VI buses
 - Queens Road depot electrification
 - 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

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>

⁶ [Change Request_001 - Approved - CleanAirGM_Version.pdf](#)

1.11 And adding the following:

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

1.12 All these measures proposed in the Change Control can be funded within the agreed JAQU funding award.

2 Key Developments Since July 2025

2.1 Officers have received confirmation from JAQU that the Change Control proposal to adjust some elements of the Bus and Local Measures, based on a change in local circumstances has been approved.

2.2 In assessing the proposals JAQU officials considered the potential risks around continuing to ensure compliance with NO₂ limits is achieved in the shortest possible time in Greater Manchester. These will be managed as part of a Performance Management Plan (PMP), which JAQU have requested is approved as soon as possible.

2.3 The PMP attached as Appendix One outlines the processes for monitoring, evaluation, benefits realisation, and adaptive planning designed to ensure the plan's effectiveness and adherence to the government direction.

2.4 The plan sets out:

- A description of the four-stage process specified in JAQU's technical guidance, enabling local authorities to demonstrate successful NO₂ reduction and exit from the NO₂ programme.
- A clearly defined framework for monitoring, evaluating, and reviewing performance of the GM CAP.
- Details of the data collection and evaluation procedures used to track outputs and outcomes.
- An outlined benefits realisation plan to confirm objectives are achieved and negative impacts are mitigated.
- Details of the Adaptive Planning Process, which facilitates adjustments to the GM CAP should monitoring highlight any issues.
- An Annual Monitoring Report each July which will provide updates to include:
 - Deployment of cleaner buses and depot electrification.
 - Distribution of the Hackney Support fund.
 - Status of local highway measures.

- Air quality monitoring results.
- Expenditure on the plan.

3 Bus Investment

3.1 Following the agreement of the Change Control, GM's agreed investment-led Clean Air Plan is £51.1m for 78 zero-emission electric buses along with depot electrification in Manchester & Bolton. Work is ongoing to implement the Bus Measures and the latest position is set out in the table below.

Measure	Latest Position
Upgrade of 77 buses to OEM Euro VI at Stockport – No funding required	Complete. New OEM Euro VIs were deployed onto the GM fleet in Tranche 3. They are operating on services that have been identified by the Clean Air Plan.
Fleet – 78 ZEBs £46.4 million for the purchase of 78 ZEBs at Bolton	Currently, 20 Clean Air funded Zero Emission Buses (ZEBs) are in operation in Bolton. Further 58 ZEBs intended for the 8/10 and V1/V2 services are expected to be phased into service from May 2026.
Depot Electrification – Bolton £4.2 million to provide 24 dual chargers to support the additional 78 ZEBs at Bolton	Installation complete providing additional 24 chargers (capacity now 98 ZEBs charging simultaneously with 49 dual chargers).
Free Bus Charging (Service 1 & 2, inc Piccadilly Approach charger) £0.2 million for moving buses to/from an alternative depot, and installation of Piccadilly Approach charger	Installation of Piccadilly Approach chargers complete and <i>ZEBs are operational on the Free Bus (Service 1 & 2).</i>
Additional Operational Costs £0.3 million for operational inefficiency of restricting fleet	Ongoing. Requiring bus operators to use specific vehicles for designated services limits their flexibility and efficiency. The funding exists to address and manage this issue.
OEM Euro VI fleet to be cascaded from Bolton ZEB deployment – No funding required	Initial cascade of fleet into Wigan commenced, further cascade ongoing.

3.2 ZEBs funded by the GM CAP have / are to be deployed on the following routes.

Route	Depot	Vehicles ⁷	Exceedance location	Status
36	Bolton	20	A34 Bridge St, Manchester	In Service
37	Bolton	20	King St, Manchester New York St, Manchester Portland St, Manchester	In Service
471	Bolton	20	A58 Bolton St, Bury	In Service
472/ 474	Bolton	10		In Service
X39	Bolton	0 ⁸	A34 Bridge St, Manchester King St, Manchester New York St, Manchester	In Service
8/10	Bolton	28	A34 Bridge St, Manchester A664 Shudehill, Manchester	From May 2026
V1/V2	Bolton	30	A34 Bridge St, Manchester Portland St, Manchester	From May 2026

4 Local Traffic Measures

4.1 Manchester and Salford City Councils are delivering the Investment-led Plan local measures.

4.2 Salford City Council Measures Update.

Measure	Latest Position
Speed limit reduction from 40mph to 30mph	Signage expected to be installed in February 2026.
Signal timing adjustment on A57 Regent Road and adjacent parallels	Adjustments to signal timings are expected to commence in January 2026.
Yellow box enforcement at junctions along the A57 Regent Road corridor. <ul style="list-style-type: none"> M602/A5063 Albion Way/A57 Regent Road/A6042 Trinity Way roundabout A57 Regent Road/ A5066 Oldfield Road A57 Regent Road/Ordsall Lane A57 Regent Road/A6042 Trinity Way 	The line markings have been completed. Camera installation is planned, with operational commencement anticipated in February 2026.

⁷ 128 ZEBs required in total, of which 50 ZEBs provided from other funding sources

⁸ The X39 is operated with the fleet used for the 36, 37 & 471 services, therefore no additional ZEBs are required for this service.

4.3 Manchester City Council Measures Update.

Measure	Latest Position
Yellow box enforcement at junctions along the A34 Quay Street corridor <ul style="list-style-type: none">• A6042 Trinity Way / A34 Irwell Street / Loverose Way• A34 Quay Street / Water Street• A34 Quay Street Gartside Street• A34 Quay Street / A56 Deansgate	The works completed include resurfacing, line marking, and the installation of enforcement cameras. The cameras are currently pending configuration, with operational commencement anticipated in January 2026.

5 Hackney Support Fund

- 5.1 In July 2025, the committee agreed 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.
- 5.2 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. The grant 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 – as set out in Appendix Two – are designed to partially offset the expense rather than fully covering the cost.
- 5.3 Working with the GM Authorities a list of eligible vehicles has been established. There are currently 990 eligible hackney vehicles qualifying for the existing £8 million support scheme. Of these, 820 are owned by single-vehicle licensees, while 38 owners possess multiple vehicles — most of whom own two vehicles each, with a minority owning three or more. The largest multi-vehicle owner has 8 vehicles requiring replacement. Based on this data, we anticipate up to 858 applications in the initial round, leaving 132 vehicles eligible in the second round.
- 5.4 The GM Authorities have collaborated with the GM Growth Company to oversee the administration of the grant funding process and the fund opened on 8 December 2025.
- 5.5 Distribution of Grants at 13 January 2026 – 219 applications have been received. Of these, 193 have been fully processed and Fund Award Notifications (FANs) issued. The remaining 26 applications are either awaiting additional information from applicants or are being processed before FANs can be issued.
- 5.6 The following tables set out the value of grant available and committed (at 13 January 2026), the number of vehicles upgraded and the split across authorities.

Purpose	Value of Grant (net of Admin costs) £m	Value Committed⁹ £m	Vehicles Upgraded
Hackney	8.0	1.58	1

Applications by Local Authority (LA) and Vehicle Upgrade Category

Local Authority	Total Eligible Vehicles	Eligible for Round 1	Applied	% Eligible Round 1 Applied	Pending	Approved			
						WAV ¹⁰		Non-WAV	
						ZEC 11	Euro 4/6 ¹²	ZEC	Euro 4/6
Bolton	48	48	6	13%	0	3	3	0	0
Bury	25	24	24	100%	2	0	22	0	0
Manchester	689	613	115	19%	16	48	51	0	0
Oldham	12	9	7	78%	1	1	3	0	2
Rochdale	26	21	10	48%	0	0	6	1	3
Salford	19	8	3	38%	1	2	0	0	0
Stockport	53	46	22	48%	2	3	17	0	0
Tameside	61	57	20	35%	3	1	16	0	0
Trafford	41	26	8	31%	1	3	4	0	0
Wigan	16	6	4	67%	0	0	3	0	1
TOTAL	990	858	219	26%	26	61	125	1	6

⁹ Value Committed is the total value of grants that have been paid following vehicle upgrade, plus the total value of the grants for applicants who have applied and been awarded a Fund Award Notification with a committed grant value based on their proposed vehicle upgrade choice (but are yet to complete the upgrade).

¹⁰ WAV: Wheelchair Accessible Vehicle

¹¹ ZEC: Zero Emission Capable Vehicle

¹² Euro 4/6: Euro 4 petrol or Euro 6 diesel or higher

6 Private Hire Vehicle Support Funding

- 6.1 The *GM Taxi Review: Trade Engagement and Licensing Model*¹³ report presented to the GMCA on Friday 28 November recommended that Leaders endorse the exploration of a fund to assist private hire vehicle (PHV) owners in upgrading their vehicles to meet revised emission standards; and to subsequently feed this into the 2026/27 GMCA budget setting process. A verbal update will be provided at the meeting.

7 Signage

- 7.1 Apart from 10 signs in Salford planned for removal in February 2026 and 6 in Stockport scheduled for removal in January 2026, all Clean Air signs on the local road network have been taken down. Funded by the government, the total cost for this work is £563,722: £404,579 for services by the signage contractor and £159,144 for local authorities taking down signs in their districts.
- 7.2 National Highways is responsible for managing the Strategic Road Network signage. They anticipate removing their signs by end March 2026. One site on the M62, which consists of two existing posts but has no sign face, has been reused for signposting to the Ladywell Metrolink Park and Ride site as part of their programme of works.

8 Automatic number plate recognition (ANPR) cameras

- 8.1 To date 372 Clean Air funded cameras are operational across Greater Manchester.
- 8.2 Greater Manchester Police (GMP) have determined that they wish to take over the majority of installed and uninstalled GM ANPR cameras. 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.
- 8.3 A 6-week consultation on the ANPR Camera Change of Use ran from 23 September to 6 November 2025 on the proposal for:
- 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.
 - Greater Manchester Police 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.

¹³ [Taxi Review and Engagement Update](#)

8.4 The consultation material and engagement activity used the GMCA “Together We Are” visual identity and this was coordinated by the GMCA Safer & Stronger Communities team.

Outcome of Consultation

8.5 The consultation was hosted on the GM Consult webpage and during the 6-week window received a total of 4830 responses. This is the largest number of responses received from a Safer and Stronger Communities consultation on the GM Consult platform since its first use in 2018.

8.6 89.7% of respondents agree (with 65.3% strongly agreeing) with the proposal to change the primary use of the Clean Air Zone ANPR cameras to law enforcement. See Appendix Three for more detail on the findings.

8.7 A number a desired clarifications were raised which need to be considered, these include.

Issue Raised	Clarification
Greater clarity on how these cameras will support crime prevention / reduction.	<ul style="list-style-type: none"> • ANPR cameras will integrate with GMP’s systems to enable real-time checks against national databases. • Supports rapid identification of vehicles linked to serious crime, terrorism, and missing persons. • Enhances intelligence-led policing without replacing visible community engagement.
Impact these cameras will have on GMP’s demand and whether they have the resources to respond to a potentially significant increase in alerts being generated by the ANPR infrastructure.	<ul style="list-style-type: none"> • Increased alerts may place additional demand on GMP. • Resource planning and budget adjustments are being undertaken to ensure operational capacity. • Technology is designed to complement existing policing, not replace frontline officers.
How will this technology help tackle the areas of policing GMP are seen to be inefficient (i.e. everyday crimes such as theft, ASB etc).	<ul style="list-style-type: none"> • Automates vehicle checks, freeing officer time for frontline duties. • Provides actionable intelligence to support investigations into theft, ASB, and other everyday crimes. • Enables better allocation of resources through data-driven insights.
Greater clarity needed on data privacy and sharing between GMP and TfGM, and the impact of proposals on individuals with protected characteristics would be welcomed to reduce distrust of services.	<ul style="list-style-type: none"> • GMP will act as Data Controller, ensuring compliance with GDPR and national policing standards. • A Data Protection Impact Assessment (DPIA) has been completed for consultation; GMP will lead on full DPIA and Equalities Impact Assessment (EIA) for implementation. • Data sharing between GMP and TfGM will follow strict legal frameworks.

Issue Raised	Clarification
Transparent and accessible information would further boost trust in the proposal.	<ul style="list-style-type: none"> • Commitment to publish DPIA, FAQs, and clear explanations of data use and safeguards. • Ongoing engagement to address misinformation and reinforce ethical use of technology. • Accessible information will be key to reducing distrust and improving confidence in the proposal.

- 8.8 Given the public support for the proposals as evidenced through both the public consultation and four focus groups, it is recommended that:
- GMP 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 , noting GMP will share data with TfGM to support transport planning and Clean Air Plan Monitoring and Evaluation and TfGM will not have access live data from the ANPR cameras.
 - A delegation is made to the Group Chief Executive, GMCA, GMFRS and TfGM, in consultation with the GM Mayor and GM Clean Air Lead, to approve the final arrangements, including the implementation Data Protection Impact Assessment, to complete the ownership transfer of cameras from TfGM to GMP.
- 8.9 GMP will assume ownership of the Clean Air funded ANPR cameras, with funding provided through the GMP budget. This budget is comprised of central government grants, local council precepts, and other allocations that support policing throughout the city-region .
- 8.10 GMP's 2026/2027 budget allocation for integrating these cameras and data systems will be reported verbally as it is to be confirmed at the Police & Crime Panel meeting on 28 January 2026.

9 Appendix One: Performance Management Plan

9.1 Attached as a supplementary paper.

10 Appendix Two: Hackney Support Funding

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

11 Appendix Three: ANPR Camera Change of Use Consultation – Findings

- 11.1 Greater Manchester Police (GMP) want to 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 crime detection.
- 11.2 The proposal to enable consultees to respond to a change of use was as follows:
- 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.
- 11.3 A 6-week consultation on the ANPR Camera Change of Use ran from 23 September to 6 November 2025.
- 11.4 The consultation material and engagement activity used the GMCA “Together We Are” visual identity and this was coordinated by the Communications and Engagement Team, TfGM and Safer & Stronger Communities team

Outcome of Consultation

- 11.5 The consultation was hosted on the GM Consult webpage and during the 6-week window received a total of 4830 responses. This is the largest number of responses received from a Safer and Stronger Communities consultation on the GM Consult platform since its first use in 2018.
- 11.6 The demographic profile of the responses received is as follows:

Group	Category	Percentage
Age	65-74 years old	24%
	55-64 years old	23%
	45-54 years old	17%
	35-44 years old	13%
	+75 years old	11%
	25-34 years old	8%
	18-24 years old	1%
Gender	Male	48%
	Female	42%
	Prefer not to say	7%
	Non-binary	1%
	In another way	1%
Ethnicity	White	86.7%

Group	Category	Percentage
	Prefer not to say	6.6%
	Asian	3.5%
	Mixed race	1.1%
	Black	0.7%
	Other	0.4%
Residency	Manchester	12.1%
	Bolton	12%
	Stockport	10.8%
	Wigan	10.4%
	Tameside	10.1%
	Rochdale	9.4%
	Bury	9.2%
	Trafford	8%
	Oldham	7.2%
	Salford	6.8%
	Prefer not to say	3.4%

11.7 The headline findings from the consultation are:

- 89.7% of respondents agree (with 65.3% strongly agreeing) with the proposal to change the primary use of the Clean Air Zone ANPR cameras to law enforcement
- 7.1% of respondents disagree with the proposal
- 2.7% of respondents remained neutral.

11.8 The primary concerns of respondents with the proposal were as follows:

- How their privacy would be protected (38.2%).
- How their data may be shared (37.0%).
- Data storage timelines (30.1%).
- How their data may be used (29.3%).
- The accuracy of the data collected (23.5%).
- Fewer residents were concerned about not knowing the location of the ANPR cameras (11.8%).

11.9 Respondents identified the main benefits of the proposal as:

- Supporting GMP's ability to investigate crime more efficiently (84.4%).
- An increased ability to prevent crime against residents and businesses (83.6%).
- Allowing GMP to quickly provide evidence to courts (79.6%).

- The change in purpose provided taxpayers with value for money (74.5%).
- Fewer respondents but still a majority believe the ANPR cameras will safeguard vulnerable people (63.4%) and enable GMP to provide reassurance to communities (57.7%).

11.10 Within the consultation there were three questions which allowed for respondents to provide further insight as to why they had responded as they had. These responses have been analysed, and the main themes are provided below

11.11 Benefits of and reasons for supporting the proposal were identified as:

- **Crime Prevention & Community Safety** with many respondents expressed strong trust in GMP, stating “anything that helps the police” was a strong positive and should be pursued and that there wasn’t much of a debate to be had if the outcome was working towards protecting local communities and enabling GMP to access the tools and technology required to do this. Emphasis was given that wherever possible, resources should be made available to support crime prevention efforts, and in particular some respondents referred directly to issues such as county lines drug networks, firearms offences and stolen vehicles. These respondents stressed the need for greater intelligence capability and believed that ANPR could play a role in improving the police response to organised and high-harm crime.
- **Efficiency & Cost Effectiveness** reasons were strongly noted, given that the cameras are already installed and operational and therefore many saw it as logical and cost-effective to use them for policing purposes. Comments within this theme often highlighted both financial responsibility and practical efficiency, expressing a preference for making use of existing public assets rather than allowing them to remain unused.
- Whilst **Road Safety & Public Reassurance** is not seen as a primary operational purpose of the cameras, some respondents believe increasing the safety of Greater Manchester’s Road network is a key benefit of the proposal, with many residents citing road safety issues such as untaxed and uninsured vehicles, and anti-social driving behaviours.

11.12 Concerns with and reasons for disagreeing with the proposal were:

- **Privacy**, with the proposed change in purpose from environmental monitoring to law enforcement as an intrusion into personal privacy. Many felt that the level of surveillance in everyday life is already extensive and that converting Clean Air Zone cameras into ANPR devices would represent an overreach. Questions were raised about who would have access to the data collected, and whether this could lead to misuse, either through improper access or inadequate safeguards. Some respondents were specifically uneasy about the possibility of third-party (i.e. Transport for Greater Manchester) accessing to data, linking this to wider anxieties about privacy in the digital

age, including recent cyberattacks, the introduction of digital identification systems, and a broader distrust of institutions.

- **Mission Creep** and whether additional uses of the cameras would be introduced without further consultation with the public. Respondents expressed scepticism that the cameras were being amended with the intention of raising revenue for police and local government. Respondents felt the cameras would go on to be used for traffic offences such as speeding, parking violations, and tax and insurance, with some respondents expressing conditional support for the scheme on the basis these introductions were not pursued.
- **Data Security** concerns ranged from general data security issues such as the possibility of cyber-attacks and having their data leaked, to general data practices such as data retention windows and safe storage. Some respondents held concerns regarding the data collected being used personally by officers with access to the system, alongside concerns the data may be sold on to third parties who may be interested in using the data for other purposes.

11.13 Often respondents expressed their support for the proposal, but expressed conditional support based on the need for appropriate governance and expressing a need to be reassured that the data captured by ANPR would be managed responsibly, retained only for legitimate policing purposes, and subject to strict controls.

- The **Effectiveness** of the technology was also questioned, with some respondents questioning whether the placement of the cameras may not be effectively placed for the new law enforcement purpose. Concerns were also raised regarding the use of illegal and cloned number plates with concerns that could increase with knowledge that more ANPR technology was in place and being used and if this did happen, there would be little impact on criminals, but innocent members of the public may be required to prove their innocence if cloned plates were used. There were also a number of respondents who felt the cameras were only part of the solution and expressed concern as to the availability of resource and staff required to utilise the cameras and instead GMP should be focused on improving community safety through visible policing and police on the ground. Whilst cameras may provide useful data, they were not to be used in place of active engagement, deterrence, and traditional policing methods.
- **Trust and Transparency** was a concern throughout the responses, with some respondents requesting further information regarding the proposal and reassurance regarding data controls, safety, and restrictions that would be in place. Other respondents expressed a general distrust of GMP and the

government, expressing their suspicions that the proposal is just an excuse for a wider goal of state surveillance and control.

11.14 Overall, the same considerations that respondents identified as benefits and concerns also shaped their overall stance on the proposal. Agreement was most strongly influenced by perceptions of safety, efficiency, and trust in policing, while disagreement was primarily driven by concerns over privacy, data use, and the expansion of surveillance. Although a clear majority supported the proposal, the free-text reasoning shows that public confidence in its implementation depends heavily on transparent communication and the maintenance of strict safeguards. Together, these insights illustrate how residents balanced the perceived benefits of ANPR technology with the responsibilities of governance, trust, and accountability.

Research Focus Groups outputs

11.15 Further to the public consultation, four one-hour long focus groups were delivered by Bluegrass Research Ltd on behalf of the Greater Manchester Combined Authority. Inclusivity and representation were priorities within the focus groups with the focus groups' sample structure based on a spread of demographics that broadly represented the GM population as per the ONS Population Survey. There was a total of 30 participants in the focus groups.

11.16 The focus groups were structured to understand both the participants unprompted awareness and understanding of ANPR cameras in general before the change of use proposal was presented to them and their views recorded.

11.17 Pre-proposal concerns focused around ANPR cameras being used for issuing fines and financial motivation by services and companies.

11.18 ANPR cameras were also identified as being part of the contentious Clean Air Zone scheme and prompted negative views as to the use of this technology as well as the wider topic of the previously proposed Clean Air Zone.

11.19 There were also some concerns raised that this could be a way of preserving the cameras in Greater Manchester in case a charging Clean Air Zone is reviewed and considered again in the future.

11.20 The proposal for GMP to assume ownership of the cameras was broadly well received, with the idea that this proposal might not proceed potentially being more controversial as it restricts GMP's ability to do its primary role of keeping Greater Manchester as safe as possible. The proposal was well received on the grounds that:

- The proposal makes financial sense.
- Any initiative that helps reduce crime is unlikely to be a bad thing.
- Many assume the technology is already in use, so expanding capabilities is seen as logical.

11.21 A number a desired clarifications were raised which need to be considered as part of future public engagement on the outcome of this consultation and implementation of the proposal.

Issue Raised	Clarification
Greater clarity on how these cameras will support crime prevention / reduction	<ul style="list-style-type: none"> • ANPR cameras will integrate with GMP’s systems to enable real-time checks against national databases. • Supports rapid identification of vehicles linked to serious crime, terrorism, and missing persons. • Enhances intelligence-led policing without replacing visible community engagement
Impact these cameras will have on GMP’s demand and whether have the resources to respond to a potentially significant increase in alerts being generated by the ANPR infrastructure	<ul style="list-style-type: none"> • Increased alerts may place additional demand on GMP. • Resource planning and budget adjustments are being undertaken to ensure operational capacity. • Technology is designed to complement existing policing, not replace frontline officers.
How will this technology help tackle the areas of policing GMP are seen to be inefficient (i.e. everyday crimes such as theft, ASB etc).	<ul style="list-style-type: none"> • Automates vehicle checks, freeing officer time for frontline duties. • Provides actionable intelligence to support investigations into theft, ASB, and other everyday crimes. • Enables better allocation of resources through data-driven insights.
Greater clarity needed on Data privacy and sharing between GMP and TfGM, and the impact of proposals on individuals with protected characteristics would be welcomed to reduce distrust of services	<ul style="list-style-type: none"> • GMP will act as Data Controller, ensuring compliance with GDPR and national policing standards. • A Data Protection Impact Assessment (DPIA) has been completed for consultation; GMP will lead on full DPIA and Equalities Impact Assessment (EIA) for implementation. • Data sharing between GMP and TfGM will follow strict legal frameworks.
Transparent and accessible information would further boost trust in the proposal.	<ul style="list-style-type: none"> • Commitment to publish DPIA, FAQs, and clear explanations of data use and safeguards. • Ongoing engagement to address misinformation and reinforce ethical use of technology. • Accessible information will be key to reducing distrust and improving confidence in the proposal.

11.22 In summary, the levels of support for the proposals and the benefits and concerns associated with it mirror those seen in the wider public consultation.