Improving Air Quality – Joint Select Committee Inquiry

I am sorry that a prior engagement means I am unable to provide oral evidence for the joint Select Committee inquiry into air quality in England. However, given the importance of this work I did want to provide a summary of the Greater Manchester perspective on plans to improve air quality and reduce harmful emissions.

Poor air quality is a severe problem in parts of Greater Manchester, where around 2,000 deaths each year may be attributable to air pollution. For context this is some 40 times the number of fatalities on our city-region’s roads each year.

There is no silver bullet to tackle this urgent public health issue, instead we believe there needs to be a mix of local and national measures. At a local level, Greater Manchester is ready to play our part and indeed we have been working collectively on this agenda for some time. However, we believe there is currently an absence of national leadership which is hampering our ability to make effective progress.

In Greater Manchester, commuting, freight and residents’ travel patterns and traffic flows are a complex mix of local and regional flows, involving the highways managed by ten highway authorities and Highways England. This is why Greater Manchester’s authorities have been working together, and are now implementing the range of measures set out in the GM Low Emissions Strategy and Air Quality Action Plan.

Improving air quality is a core priority across Greater Manchester agencies as reflected in our Transport Strategy 2040 and ‘Taking Charge’ – our five-year plan for health and social care. In February 2018, we will publish a new plan to tackle traffic congestion across Greater Manchester, with action to reduce the level of dangerous emissions that build up in slow moving, stop-start traffic.

However, whilst it is right that local areas are given flexibility for coming up with measures that take account of local conditions, there is a key role for Government in determining national fiscal measures and legislation, as well as controlling key national agencies, such as Highways England.

We remain very concerned that national policy and resourcing does not support local authorities in implementing effective and proportionate measures to achieve the emissions reductions as quickly as possible. To date, the Government’s approach appears to have been to ‘out-source’ much of the problem to local authorities, whilst failing to properly resource them or to fund the right national measures to support local areas in improving air quality.

In particular, we have three key concerns with the approach outlined in the Government’s latest air quality plan:

1. **Narrow Focus**

   The narrow focus of the July plan was to deal with NO2, and as such it does not properly address the wider air quality problem, which includes particulates. Perhaps driven by a need to avoid legal challenge, the Government’s approach simply risks repeating mistakes of the past, by failing to take a holistic approach and clearly address how to also reduce carbon emissions from our transport systems.
Government now promise to publish their wider air quality strategy next year. The key problem that this creates for local authorities is that Government requires them to make an assessment now of the most effective way of reducing NO2 emissions, whilst Government is itself unclear about wider national policy, interventions and their likely effects which may have a bearing on any proposed measures.

2. Unrealistic Deadlines

Secondly, the Government is imposing a very tight, if not unrealistic deadlines on local authorities to develop and secure local agreement on plans to reduce NO2, for example requiring approval of draft plans by March and final approval by the end of 2018. However, the necessary guidance issued to local authorities is still in draft form, rendering an already challenging process even more uncertain.

3. Inadequate Funding

The funding committed by Government to its NO2 plans is simply inadequate, both in terms of funding for those local authority areas that Government has identified as having the most severe air quality problems, and in terms of funding national measures. For example, those seven Greater Manchester authorities that Government modelling has identified as having one or more roads with NO2 concentration forecasts above statutory limits have recently been informed that they cannot apply for the Air Quality Grant Fund. We would welcome the Joint Committee’s support in raising awareness of this discrepancy.

In terms of national measures, Greater Manchester has proposed the general principle that Government should target funding toward those areas of both high exceedances and dense populations. This would mean targeting Government support toward local authorities and potentially businesses and residents in those highly populated areas with the worst air quality problems and worst health outcomes. However, we are still waiting to hear from Government in relation to proposals for scrappage schemes or a new Green Bus Fund, to help make public transport as clean and green as possible.

I look forward to the report of the inquiry and will await its recommendations with keen interest. In the meantime, we would be happy to provide you with any further information you may require.

November 2017

---

2 https://www.greatermanchester-ca.gov.uk/homepage/131/greater_manchester_low-emission_strategy_and_air_quality_action_plan
3 https://www.tfgm.com/2040
4 http://www.gmhsc.org.uk/assets/GM-Strategic-Plan-Final.pdf