

Transport for Greater Manchester (TfGM) consultation on the draft Greater Manchester Low-Emission Strategy and Air Quality Action Plan

Response from Campaign for Better Transport

April 2016

Campaign for Better Transport is a leading charity and environmental campaign group that promotes sustainable transport policies. Our vision is a country where communities have affordable transport that improves quality of life and protects the environment.

The need for action on air pollution is grave and urgent. Air pollution in the UK breaches legal air quality limits. Dirty air causes tens of thousands of people to die early each year, and contributes to life-limiting conditions in many more. Children whose lungs are still developing are particularly at risk.

The links between motor vehicle traffic and air pollution are well-established. Some 80% of NO_x in areas exceeding EU limits comes from road transport, primarily diesel vehicles. Latest figures indicate that 97% of all modern diesel cars emit more toxic nitrogen oxide (NO_x) pollution in real-world conditions than in laboratory compliance testing, contributing further to illegal pollution levels.¹ Relying on upgrading to more modern vehicles to fix the problem for us while our transport behaviours stay the same will not work. Given that the single biggest contributor to air pollution is diesel vehicles, joined-up working on sustainable transport is essential to tackling the problem.

We therefore strongly welcome the positive approach set out in Greater Manchester's draft Low-Emission Strategy and Air Quality Action Plan, including:

- stimulating uptake of ultra-low-emission vehicles (ULEVs)
- reducing emissions from HGVs
- reducing emissions from buses on key urban corridors
- changing travel behaviour
- investigation of clean air zones
- focusing on the M60/ M62 corridor, major routes into town and the impact of new developments.

In particular we note that having proposed interventions across different sectors – development control, freight management, public transport, active travel, and information services – will combine to produce a much more effective strategy than action on one front alone.

We believe the strategy could go further and make explicit connections with strategies and action plans from other agencies, including

- NHS Greater Manchester. Cleaner air delivers improved health outcomes, and health should be included in the 'complimentary effect' section.
- Transport for the North. Greater Manchester's Transport Strategy (Vision 2040) is impressive but will require effective partnership working across the region to be fulfilled, providing sustainable options for journeys into as well as within Greater Manchester.
- Highways England. The Strategic Road Network through Greater Manchester is a priority area for partnership action, through Highways England's emerging Air Quality Strategy.

¹ <http://www.theguardian.com/business/2016/apr/23/diesel-cars-pollution-limits-nox-emissions>

- Future devolved structures. Action on air pollution must become and remain a political and organisational priority for the future administrations and future Mayors, including use of powers and budgets in other areas including health, policing, planning and economic development, to address the issue.
- National Government. Additional powers for Greater Manchester, for example to control polluting vehicles through fiscal or licensing measures, may be necessary for effective delivery of the action plan.

We believe it will take this scale of ambition and commitment to deliver the necessary results in tackling air pollution across Greater Manchester.

In welcoming the Low-Emission Strategy and Air Quality Action Plan as a whole, there are some specific aspects we would highlight:

Clean Air Zone/Low Emission Zone

We welcome recommendation 1.4. *Clean Air Zone Appraisals: TfGM will undertake an appraisal of the effects of Clean Air Zones (CAZs) as a first step to bringing forward a Clean Air Zone/Low Emission Zone, a measure whose implementation we strongly support as essential to underpin an effective air quality action plan.*

We believe a CAZ/LEZ model that uses differential vehicle charging by level of emissions would provide positive incentives for people to switch vehicles as well as helping reduce air pollution and congestion.

- Charging could be applied flexibly to (dis)incentivise travel by particular routes or at particular times of day
- Real time air quality monitoring could be used to apply flexible charging, perhaps through pre-advertised price bands, in response to daily pollution levels.
- Charges could be applied in a way that encourages drivers to choose genuinely cleaner vehicles including hybrid and electric cars.
- Workplace parking levies could be adjusted to give incentives to buy and run low emission cars of all kinds.
- The charging regime for LGVs and HGVS can be linked to the other measures proposed to reduce HGV traffic, incentivise lower emission vehicles and support better freight operations.

Past surveys indicate that there is public acceptance of road pricing measures, provided that the proceeds are reinvested in sustainable transport alternatives.² This is therefore an opportunity to generate investment for public transport and active travel as well as helping deliver improved air quality, resulting in a win-win for the City.

Land use planning

We welcome the recommendation 1.2 *Development Planning Guidance to ensure that sites are properly appraised for local air quality impacts as necessary but not sufficient.*

Land-use planning guidance should explicitly discourage car-dependent development and instead support and encourage development based on sustainable public transport, walking and cycling, in support of the Air Quality Action Plan.

Manchester has seen a growth in city centre housing, including new high quality/ high density developments proposed at Deansgate Locks. There is an opportunity to make these and other developments exemplars, for example by promoting car-free housing (where residents have access to car clubs and not to residents' parking) and by concentrating new homes at transport hubs.

Other measures to consider include

- Locating new housing with a focus on walking distance to major public transport links and existing urban centres
- Larger developments should have dedicated public transport routes with direct high quality pedestrian and cycle links to public transport.

² <http://www.ippr.org/publications/charging-forward-a-review-of-public-attitudes-towards-road-pricing-in-the-uk>

- Smart travel and behaviour change programmes such as residential travel plans should be in place both as part of the construction and marketing of a development, and then part of an ongoing commitment to supporting and extending sustainable transport.

Managing demand for workplace parking

We welcome action point 6.3 *Local Authority Parking Charges: Work with local authorities to review the introduction of parking charges at local authority offices to discourage private car use* and note action point 6.6 *Companies are encouraged to look at travel planning measures, and to investigate the potential of additional demand management measures to effect a significant mode shift.*

We would encourage Greater Manchester to go further, and follow Nottingham's successful implementation of a city centre workplace parking levy (WPL). This was reported in a briefing on the WPL produced by Nottingham City Council as part of our thought leadership programme, Tracks.³

It is forecast that the WPL package of improvements will take 2.5 million cars off the roads in Nottingham, and reduce traffic growth by around 7%, thereby helping to reduce pollution and carbon emissions. The WPL is in its fourth year of operation and continues to achieve a 100% compliance of all liable employers: it has relatively low operating costs (currently £0.475m per year) with simple online registration. In its first three years of operation (from 2011) the scheme raised £25.3m in revenue, which is ring-fenced for public transport improvements (rail, tram and bus) and support for workplace green travel plans. We commend Nottingham's experience to Manchester.

Alongside demand management, we welcome investment in alternatives, including Metrolink extensions, the Leigh Guided Busway, GM cycle network, and to maintain the successful TfGM Travelchoices scheme (providing advice on local sustainable transport).

M60/M62 corridor

We welcome the emphasis tackling air pollution on this important corridor. In 2013, the then Highways Agency abandoned plans to increase road capacity by converting the hard shoulder of the M60 for all-lane running, once it became clear that air quality would be seriously compromised and existing levels of pollution made far worse.

We note that the Department for Transport and Highways England are again considering options for the M60 North West Quadrant. We are concerned that renewed plans to spend billions of pounds increasing road capacity in response to congestion, rather than investing in more sustainable options, would risk further breaches of air quality standards, undermining the good work outlined in the draft Air Quality Action Plan.

Given that nearly 40% of morning peak journeys on the NW Quadrant of the M60 are for home to workplace travel⁴, there is great potential for alternative modes to reduce congestion and air pollution, by providing commuters with real transport choices.

HGVs and freight traffic

We welcome the focus on freight and HGVs. While we welcome the measures in the action plan to address freight movements into the city centre, through smarter servicing strategies, and better use of consolidation centres for example, we feel the strategy could say more on measures to encourage shifting of freight to rail as a means of tackling both congestion and air pollution both on city centre roads and on the Strategic Road Network; for example, expanding use of the rail head at Trafford Park as part of the wider Greater Manchester Freight and Logistics Strategy. Rail freight produces 76% less CO2 emissions than the equivalent HGV journey, 90% less PM10 and up to fifteen times less NOX.

Rail freight is well placed to offer the long distance truck haul for consumer products which can be brought into or on the edge of conurbations and then transferred to low emissions electric vehicles. There are some examples from London on which Manchester could improve: for example trials into Euston of trainloads of freight for Sainsburys and TNT show the benefits of bringing in high volumes of cargo into the centre of cities for final mile delivery in low emissions vehicles. Rail can be an integral part of infrastructure development

³ "Workplace Parking Levy NOTTINGHAM" Briefing Note for Tracks, March 2016

⁴ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/505262/m60-nwq-initial-report.pdf

bringing in aggregates and removing spoil as in the case of CrossRail and the Olympic Village. Across London, 40% of aggregates are brought in by rail, with a number of small aggregates terminals to cater for this traffic.

Water-based movement of freight, including waste and aggregates, is an important element, making best use of the Manchester Ship Canal and other waterways.

Monitoring and implementation

The goals and broad approaches in the strategy are welcome: however, to be effective they need to be accompanied by a detailed action plan, with clear milestones and funding. The action plan needs to set out interim targets for air quality targets by specific dates, to track progress, and include the flexibility to bring forward or expand planned measures, and to introduce additional measures, if milestone targets are not being achieved.

The action plan needs to include effective monitoring and transparent reporting. The people of Greater Manchester are essential partners in, as well as beneficiaries of, an effective implementation, so public monitoring and reporting must be a central element of the action plan.

This could include:

- Real time air quality information, building on the good work of the Great Air Manchester website.
- School and workplace based air pollution monitoring projects, supporting into green travel plans
- Partnership working with centres of excellence such as the Centre for Atmospheric Science at the University of Manchester to develop best practice in tracking the impact of various interventions on the city's air pollution.

Conclusion

We welcome the proposals in the Low-Emission Strategy and Air Quality Action Plan, which we believe should be implemented at the earliest opportunity for the economic and social wellbeing of Greater Manchester and the growing numbers of people who live and work here.

We urge Transport for Greater Manchester and the Greater Manchester Combined Authority to progress these important plans and to share them with other local authorities and with Transport for the North: with proper resourcing, a clear action plan and strong local commitment, Greater Manchester has the opportunity to lead the way, creating a truly liveable 21st century city in a vibrant region.

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Campaign for Better Transport

Campaign for Better Transport's vision is a country where communities have affordable transport that improves quality of life and protects the environment. Achieving our vision requires substantial changes to UK transport policy which we aim to achieve by providing well-researched, practical solutions that gain support from both decision-makers and the public.

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