

TRAFFORD COUNCIL

DELEGATED OFFICER DECISION REPORT

Report to: Corporate Director, Place
Date: 6th April 2020
Report for: Decision
Report of: Head of Regulatory Services

Report Title

Greater Manchester's Clean Air Plan – Tackling Nitrogen Dioxide Exceedances at the Roadside – Further Supplementary Information to accompany the Outline Business Case – Ten Technical Reports

Summary

The Greater Manchester Clean Air Plan (GM CAP) is underpinned by analysis and modelling using the best data and tools available. The results of this analysis are presented throughout the Outline Business Case (OBC) and have been written up in full in a series of Technical Reports. These Technical Reports have been produced in line with JAQU guidance.

Technical Reports 1 to 29 were approved by the Corporate Director, Place on 13th February 2020, and reports 30 to 32 were approved by Corporate Director, Place on 26th February 2020. The purpose of this report is to summarise the purpose and contents of ten additional supplementary technical reports that are required to be formally submitted to government's Joint Air Quality Unit to accompany the OBC

A report that set out the progress that has been made following the Government's response to the OBC was considered on 6th January 2020 at the Council's Executive meeting. At this time a delegation was given to the Corporate Director, Place to approve the submission of this supplementary information.

Recommendation(s)

The Corporate Director, Place is recommended:

- (i) to approve the following documents for submission to the government's Joint Air Quality Unit; and
- (ii) to note their publication status as set out in the report.
 - 'T1 Local Plan Transport Modelling Tracking Table - Consultation Option Jan 2020'

- 'T2 Local Plan Transport Model Validation Report - Consultation Option Jan 2020'
- 'T3 Local Plan Transport Modelling Methodology Report - Consultation Option Jan 2020'
- 'T4 Local Plan Transport Model Forecasting Report - Consultation Option Jan 2020'
- 'AQ1 Local Plan Air Quality Modelling Tracking Table - Consultation Option Jan 2020'
- 'AQ2 Local Plan Air Quality Modelling Methodology Report - Consultation Option Jan 2020'
- 'AQ3 Local Plan Air Quality Modelling Report - Consultation Option Jan 2020'
- 'Analytical Assurance Statement for the 'Option for Consultation - Jan 2020'
- 'Modelling Assumptions for the 'Option for Consultation - Jan 2020'
- 'Consolidated TIRP feedback and responses as at Feb 2020'.

Contact person for access to background papers and further information:

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1 Background

- 1.1 In July 2017 the Secretary of State issued a Direction under the Environment Act 1995 requiring seven Greater Manchester local authorities, including Trafford Council, to produce a feasibility study to identify the option which will deliver compliance with the requirement to meet legal limits for nitrogen dioxide in the shortest possible time.
- 1.2 In accordance with this Direction, Trafford Council has been developing the study collectively with the other 9 Greater Manchester local authorities and the GMCA, coordinated by TfGM in line with Government direction and guidance and an Outline Business Case (OBC) was duly submitted in March 2019.
- 1.3 The key features of Greater Manchester's feasibility study and its Outline Business Case (OBC) to reduce nitrogen dioxide exceedances in Trafford and across Greater Manchester in the shortest possible time were approved on 18th March 2019 at the Council's Executive meeting for submission to the government's Joint Air Quality Unit (JAQU).

- 1.4 Ministerial feedback was received in July 2019 along with a further direction under the Environment Act 1995 which requires all ten of the Greater Manchester local authorities to take steps to implement a plan to deliver compliance with the requirement to meet legal limits for nitrogen dioxide in the shortest possible time.
- 1.5 The ministerial letter that accompanied the July 2019 direction requested from GM further options appraisal information (including transport and air quality modelling as well as due regard to economic, financial and deliverability considerations) to be submitted prior to statutory consultation.
- 1.6 A report that set out the progress that has been made following the Government's response to Greater Manchester's Outline Business Case to tackle Nitrogen Dioxide Exceedances at the Roadside (OBC), and the implications for the 10 Greater Manchester (GM) local authorities in relation to the schedule of work and statutory consultation on the Clean Air Plan was considered on 6th January 2020 at the Council's Executive meeting.
- 1.7 At this time a delegation was given to the Corporate Director, Place to approve the submission of supplementary information.
- 1.8 In response to the Ministerial request 32 Evidence Notes, have been produced. Notes 1 to 29 were approved by the Corporate Director, Place on 13th February 2020 and notes 30 to 32 were approved by Corporate Director, Place on 26th February 2020.
- 1.9 This report considers the submission of 10 technical reports.

2 Introduction

- 2.1 The Greater Manchester Clean Air Plan (GM CAP) is underpinned by analysis and modelling using the best data and tools available. The results of this analysis are presented throughout the OBC and have been written up in full in a series of Technical Reports. These Technical Reports have been produced in line with JAQU guidance.
- 2.2 The purpose of this report is to summarise the purpose and contents of ten additional supplementary technical reports that are required to be formally submitted to JAQU to accompany the OBC.

3 Purpose of the analysis and modelling

- 3.1 Pursuant to the Ministerial Direction, and in discussions with the government's Joint Air Quality Unit (JAQU) GM has updated analysis that addresses issues raised around the behavioural assumptions used and provided assurance that the proposed Clean Air Zone will deliver compliance in the shortest possible time, and that compliance cannot be achieved earlier than 2024, such analysis includes:

- exploring whether measures targeted at the last remaining exceedance locations following implementation of a CAZ in 2021 would achieve compliance quicker;
 - updating the behavioural assumptions used to model the impact of a CAZ, following the Technical Independent Review Panel (TIRP)'s suggestions;
 - providing further sensitivity testing on vehicle upgrade assumptions; and
 - demonstrating that a Greater Manchester CAZ D cannot bring forward compliance, including outlining the delivery challenges discussed for a GM wide CAZ D.
- 3.2 In response to the Ministerial request, 32 Evidence Notes have been produced. Notes 1 to 29 were approved by the Corporate Director, Place on 13th February 2020 and notes 30 to 32 were approved by Corporate Director, Place on 26th February 2020.
- 3.3 A further 10 additional supplementary draft technical reports have been produced and have been issued to JAQU in draft form and are subject to approval, namely:
- 'T1 Local Plan Transport Modelling Tracking Table - Consultation Option Jan 2020'
 - 'T2 Local Plan Transport Model Validation Report - Consultation Option Jan 2020'
 - 'T3 Local Plan Transport Modelling Methodology Report - Consultation Option Jan 2020'
 - 'T4 Local Plan Transport Model Forecasting Report - Consultation Option Jan 2020'
 - 'AQ1 Local Plan Air Quality Modelling Tracking Table - Consultation Option Jan 2020'
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 - 'Modelling Assumptions for the 'Option for Consultation - Jan 2020'
 - 'Consolidated TIRP feedback and responses as at Feb 2020'
- 3.4 The evidence base that will underpin the Full Business Case (FBC) is still being developed. Evidence was supplied to JAQU where it was possible to do so, with the recognition that the reports represented a work-in-progress and that more work is required to properly understand the implications of the analysis from a policy, delivery, legal and analytical assurance perspective.

- 3.5 Contents of the further supplementary Technical Reports:
- 3.6 'T1 Local Plan Transport Modelling Tracking Table - Consultation Option Jan 2020' sets out feedback received to date from JAQU on the traffic and transport modelling process and supplies GM's responses to that feedback.
- 3.7 'T2 Local Plan Transport Model Validation Report - Consultation Option Jan 2020' describes the development of the base year transport model for use in the GM CAP assessment. The report describes the main features of the transport model and presents details of the base year model validation, including comparisons of modelled and observed traffic flows and journey times in the study area. Note that this report has not been updated from the OBC version.
- 3.8 'T3 Local Plan Transport Modelling Methodology Report - Consultation Option Jan 2020' describes the approach taken to forecasting road traffic for the GM CAP. The report describes the development of the future year highway networks and trip matrices and sets out the assumptions on which the forecasts are made. The report has been updated to reflect some methodology improvements and the incorporation of updated Government guidance and input values. Note that the sensitivity testing has not yet been updated from the OBC version and will be supplied to JAQU at a later date.
- 3.9 'T4 Local Plan Transport Model Forecasting Report - Consultation Option Jan 2020' describes the transport modelling process for the Greater Manchester Clean Air Plan Project and presents baseline and scenario forecasts for the preferred option which will be taken forward for consultation. The report has been substantially updated to reflect the revised methodology for deriving behavioural responses to the measures, and now includes new appendices setting out the methodology applied in the Demand Sifting Tool and new Operational Cost Models for freight and taxi. Note that the sensitivity testing has not yet been updated from the OBC version and will be supplied to JAQU at a later date.
- 3.10 'AQ1 Local Plan Air Quality Modelling Tracking Table - Consultation Option Jan 2020' sets out feedback received to date from JAQU on the air quality modelling process and supplies GM's responses to that feedback.
- 3.11 'AQ2 Local Plan Air Quality Modelling Methodology Report - Consultation Option Jan 2020' sets out the air quality modelling methodology that is and will be used to underpin any air quality modelling for the baseline (2016, 2021, 2023 & 2025) scenario and for scenario forecasts for the preferred option which will be taken forward for consultation. The report has been updated to reflect updates made to the methodology to incorporate updated Government guidance and input values.

- 3.12 'AQ3 Local Plan Air Quality Modelling Report - Consultation Option Jan 2020' provides the air quality results and discussion of the GM CAP options that have been assessed. Specifically, this document sets out the results of the proposed option for consultation. Details of the approach to model verification are provided in Appendix A, and the full set of air quality modelling results are tabulated in Appendix B as a separate pack of files. Note that the sensitivity testing has not yet been updated from the OBC version and will be supplied to JAQU at a later date.
- 3.13 'Analytical Assurance Statement for the 'Option for Consultation - Jan 2020' considers the limitations, uncertainties and risks in the evidence base, and the implications of these for decision makers. In particular, it considers whether an appropriate procedure has been followed, in terms of the modelling process and the source data, and whether appropriate checks have been carried out. It considers whether appropriate expertise has been utilised, and whether sufficient time and resources have been allocated to the analysis. The report has been updated to describe the improvements that have been made to the evidence base and modelling approach since the OBC submission and therefore the extent to which there have been changes regarding limitations, uncertainties and risks in the analysis. Note that the sensitivity testing has not yet been updated from the OBC version and will be supplied to JAQU at a later date.
- 3.14 'Modelling Assumptions for the 'Option for Consultation - Jan 2020' summarises the key modelling assumptions underpinning the analysis of the option proposed for consultation, the results of which are set out in reports T4 and AQ3.
- 3.15 'Consolidated TIRP feedback and responses as at Feb 2020' sets out all the feedback that has been received from JAQU's Technical Independent Review Panel (TIRP) and also includes the feedback set out in T1 and AQ1. It supplies GM's responses to that feedback for further review by JAQU and the TIRP.
- 3.16 These reports are unfinished as they may be subject to change before the start of the statutory consultation.
- 3.17 As such, it is considered that these reports fall within the exception under regulation 12(4)(d) EIR and that, in all the circumstances of the case, the public interest in maintaining the exception outweighs the public interest in disclosing the information.
- 3.18 These reports will be published prior to statutory consultation so there will be an appropriate opportunity for public scrutiny of them. It is not considered that the public interest would be served by disclosing at this stage drafts which are incomplete.

4 Recommendation

- 4.1 The Corporate Director, Place is recommended:

- (i) to approve the following documents for submission to the government's Joint Air Quality Unit; and
- (ii) to note their publication status as set out in the report.
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Other Options

None

Reasons for Recommendation

The recommendations will help ensure that the authority complies with the Directions served by the Government in 2017 and 2019, requiring the authority to deliver compliance with legal limits for nitrogen dioxide in the "shortest possible time".

Finance Officer Clearance PC
Legal Officer Clearance DS

HEAD OF SERVICE SIGNATURE

