

Report of the Strategic Director, Place, to the meeting of Regeneration and Environment Overview and Scrutiny Committee to be held on 26th July 2022

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Subject:

Bradford Clean Air Zone (CAZ) Update

Summary statement:

The Council has been Directed by the Government to achieve compliance with legal limits for nitrogen dioxide (NO₂) in the shortest possible timeframe and implement a Class C Clean Air Zone (CAZ). The Council Executive resolved on the 2nd March 2021 to implement the CAZ and this report provides an update on the delivery and operation of the CAZ which will launch on the 26th September 2022.

EQUALITY & DIVERSITY:

The Council has carried out an extensive Distributional Analysis and Equality Impact Assessment as part of the development of the Clean Air Plan which has been approved by the Government. This work has informed the development of the Clean Air Zone and supported the applications for funding to help mitigate against any adverse impacts of the CAZ.

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Strategic Director, Place

Portfolio:

Healthy People & Places

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Overview & Scrutiny Area:

Regeneration & Environment

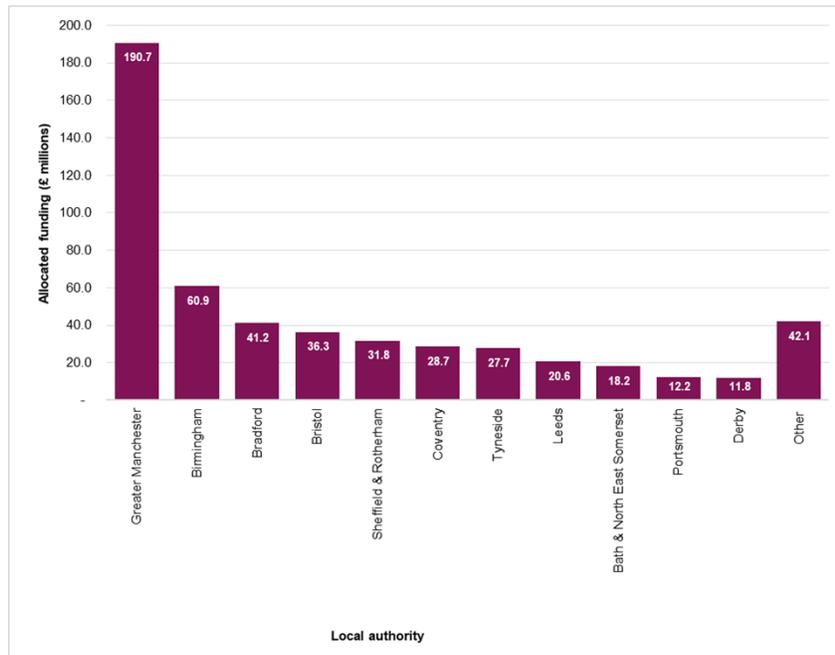
1. SUMMARY

The Council has been Directed by the Government to achieve compliance with legal limits for nitrogen dioxide (NO₂) in the shortest possible timeframe and implement a Class C Clean Air Zone (CAZ). The Council Executive resolved on the 2nd March 2021 to implement the CAZ and this report provides an update on the delivery and operation of the CAZ which will launch on the 26th September 2022.

2. BACKGROUND

- 2.1 Following Ministerial Direction to implement a Class C Clean Air Zone, to achieve compliance with legal limits for nitrogen dioxide (NO₂) in the shortest possible timeframe, and public consultation, the Council Executive Committee resolved on the 2nd March 2021 to implement the Class C CAZ. The area of the CAZ can be seen on the following link - <https://www.bradford.gov.uk/breathe-better-bradford/where-is-the-clean-air-zone/where-is-the-clean-air-zone/>
- 2.2 The implementation of the CAZ is entirely funded by Government under the New Burdens provisions and a total of £41.2m has been provided for the development of the CAZ enforcement systems and Clean Air Funding (CAF), to help local businesses upgrade to CAZ standard. The CAF is a competitive fund and the Council has secured almost £34m which is the highest level of funding provided to an authority for a CAZ of this type. Figure 1 shows the National Audit Office figures for total Government funding awards under the New Burdens regime for Directed Authorities to meet legal limits for NO₂. Additionally, the Council is providing an extensive exemptions programme to assist both businesses and residents to adjust to the CAZ over time.
- 2.3 Other CAZ have been introduced in Bath, Birmingham and Portsmouth and further CAZ are scheduled for Greater Manchester, Bristol, Newcastle, Sheffield, Stoke on Trent and Liverpool. Low Emission Zones (LEZ), which replicate a CAZ D, are due to be implemented in Glasgow, Edinburgh, Dundee and Aberdeen, and a Zero Emission Zone has been introduced in Oxford and an Ultra-Low Emission Zone (ULEZ) is in force in London.

Figure 1 – Total Government New Burdens funding to Directed authorities (NAO, 2022)



Note: Greater Manchester comprises 10 local authorities

3. REPORT ISSUES

3.1 Clean Air Team

The Clean Air Team includes CAZ Operations, Grant & Business Support, Monitoring & Evaluation, Business Services and the CAZ Contact Centre. The Monitoring & Evaluation Team also carry out all Statutory air quality functions of the Council, including monitoring and assessments, Annual Status Reports to Government and input into planning applications.

3.2 CAZ Operations

The Bradford CAZ covers 9.3sqm and will be enforced using 360 ANPR cameras linked to the Government Central Service, including the DVLA database, the Government Taxi Database, General Purpose White List and the Council's White List of local exemptions. Vehicle operators can check their vehicles for CAZ compliance on the Government Central Service Vehicle Checker - <https://www.gov.uk/clean-air-zones>.

The Government Portal also provides facilities for individuals and fleets to pay the daily charge for entering the CAZ with a non-compliant vehicle. Payment can be made up to 6 days in advance and in arrears of the day of entry. The Government Central Service also operates the national CAZ Call Centre where enquiries regarding payments and compliance can be made and they are referred to CAZ authorities where they cannot answer the enquiry for a specific CAZ.

The Government make a charge of £2 for every payment made to enter a CAZ¹.

¹ <https://www.legislation.gov.uk/ukxi/2020/1444/contents/made>

The Government set the range of charging levels for each vehicle type and the Council has negotiated the lower levels of charging for CAZ authorities and the lowest charging level for taxis in the UK.

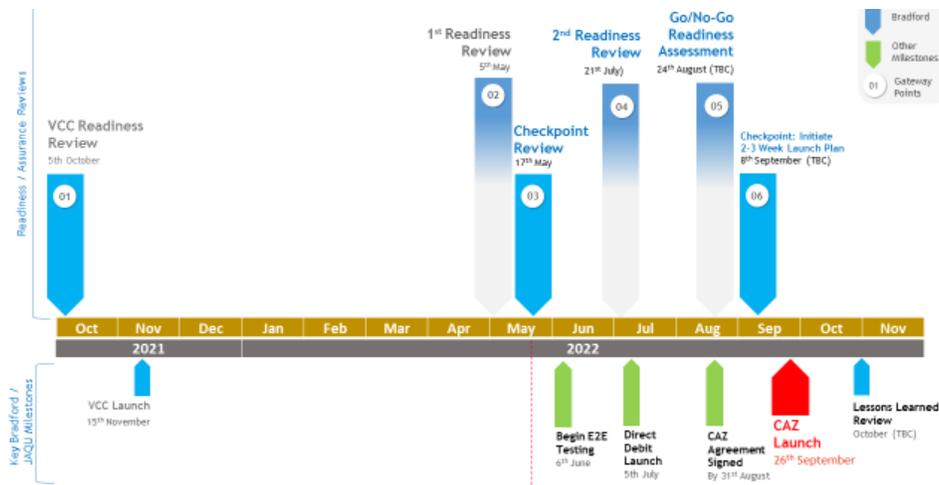
The CAZ operations system is the largest digital engineering project that the Council has undertaken involving 16km of digital ducting and 5 new digital rings around the City. From digital architecture design agreement with the Government it will have taken 12 months to the launch of the CAZ on the 26th September. The Council is the only CAZ authority to deliver all CAZ infrastructure and operations in-house, including all signage, creating and supporting skilled jobs.

The CAZ will see around 6m vehicles a week entering the Zone and the Council is undergoing robust systems testing to ensure that the Government Central Service can handle the volumes anticipated.

The Council will collect a weeks' camera data in July and August, prior to CAZ launch, and will send Early Notice Letters (ENL) in August and September, respectively, notifying non-compliant vehicle operators that entered the Zone about the CAZ requirements and sources of information such as the Breathe Better Bradford website² which includes additional information regarding current grant and exemption programmes.

Figure 2 illustrates the timelines for the preparation of the CAZ to the launch date

Figure 2 – CAZ Timelines to Launch



The CAZ will be enforced from 26th September. Any non-compliant vehicle operator that is liable to pay the daily charge and does not make the payment will be liable for a penalty charge notice (PCN). The PCN will be £120 plus the daily charge, reduced to £60 plus the daily charge if paid within 14 days

3.3 CAZ Support

The Council is providing £32,814,200 in grant funding to help businesses to

² <https://www.bradford.gov.uk/breathe-better-bradford/breathe-better-bradford/>

upgrade their vehicles to CAZ standard. An additional £3.96m of Clean Bus Technology Funding (CBTF) had previously been awarded to retrofit buses both scheduled and tendered bus services in the District.

Grant funding has been made available to local businesses up to small and medium enterprise (SME) size, however, the Council has also made bus, coach and HGV funding available to businesses outside of the District who could provide evidence of entering the CAZ frequently.

Funding has been awarded that will see 317 buses upgraded to CAZ standard, including all scheduled and tendered services that enter the CAZ. 468 HGV grants have been awarded to businesses which equates to around 20% of all HGVs registered in the District. 38 coach grants have been awarded and grant funding has enabled the licensed taxi fleet to achieve 90% compliance. The Bradford taxi fleet is arguably the cleanest taxi fleet in the UK. Funding has been allocated for 1,800 vans and minibuses.

Full funding totals have been allocated in respect of buses, coaches and HGVs. The Clean Air Taxi and Clean Air Van & Minibus Funds are still open for applications.

The Council has worked closely with trade bodies such as the Road Haulage Association (RHA) and the Federation of Small Businesses (FSB) to provide information to local businesses, including on-line webinars.

The following videos show some of the businesses that have been supported by the Clean Air Grant Programmes:

Driving Miss Daisy - <https://www.youtube.com/watch?v=J6cgiu2qaX4&list=PLzYOSpxR-vtv19BCJQiWJa7ACjNVZM8Jc&index=2>

First Bus - <https://www.youtube.com/watch?v=qXL5J89o5lo&list=PLzYOSpxR-vtv19BCJQiWJa7ACjNVZM8Jc&index=4>

Manningham Concrete - <https://www.youtube.com/watch?v=ak1HdT5pL24&list=PLzYOSpxR-vtv19BCJQiWJa7ACjNVZM8Jc&index=5>

TF Smiths - <https://www.youtube.com/watch?v=TMziGWTZSbs&list=PLzYOSpxR-vtv19BCJQiWJa7ACjNVZM8Jc&index=8>

Bhatti Travel Services - <https://www.youtube.com/watch?v=uPflLPII1Rc&list=PLzYOSpxR-vtv19BCJQiWJa7ACjNVZM8Jc&index=2>

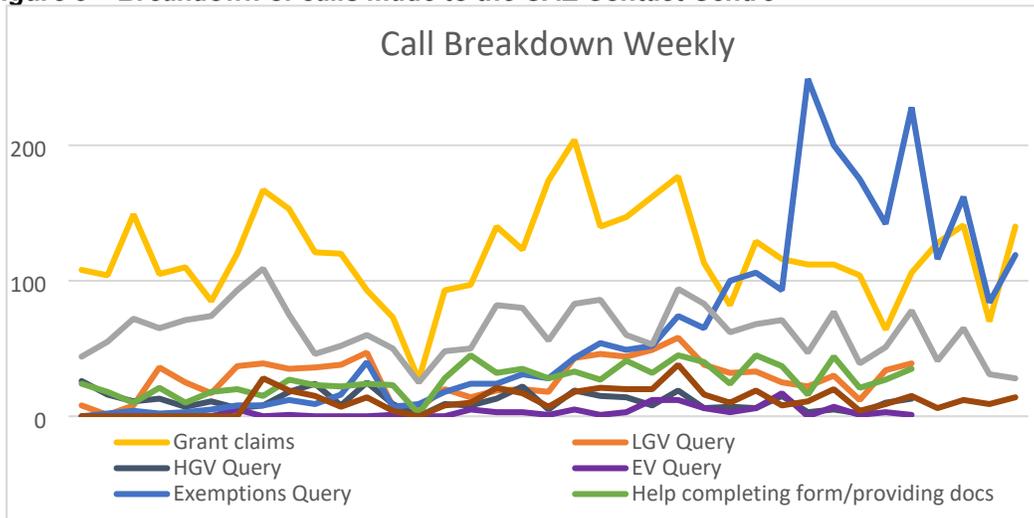
The Clean Air Exemption Programme was launched on the 8th April 2022, allowing local SMEs and residents to obtain exemptions from CAZ charges. Additionally, businesses outside of the district with specialist vehicles, school buses, members of the Showman's Guild and charities can also apply for exemptions. The Government

has exempted military vehicles, disabled (tax class) vehicles and agricultural (tax class) vehicles. 92.33% of exemptions awarded to date are for local SME and residents.

The Council has issued 3,837 exemptions to date and expects around 5,000 exemptions in total. The Exemptions Programme was modelled as part of the final business case submitted to Government, which showed that in terms of the total volume of vehicles entering the CAZ, local vehicles were only a small percentage (14% of LGV and 8% of HGV) and, therefore, the exemptions could be provided without jeopardising the achievement of compliance with legal limits for NO2.

The Council has a dedicated CAZ Contact Centre (01274 435533) who deal with a variety of calls, providing advice on the CAZ and the grant and exemptions programmes. A breakdown of weekly call received by the Contact Centre is shown in figure 3. It can be seen where we have received an increase in enquiries following the launch of grant and exemptions programmes.

Figure 3 – Breakdown of calls made to the CAZ Contact Centre



3.4 Air Quality and CAZ Monitoring & Evaluation

The Council has expanded the air quality monitoring network from 80 monitoring tubes to just over 400 tubes monitoring NO2. Some of this increase is due to Government requirements for monitoring the CAZ. Additionally, the Council has 7 automatic monitoring stations, providing real time data for NO2 and particulate matter. All monitoring data is submitted to the Government each year for audit and is then published by the Council in the Air Quality Annual Status Report in September.

Air quality levels 2020 and 2021 have been affected by reductions in traffic due to national Covid lockdowns. Figure 4 shows provisional NO2 levels at key sites in the District in 2021. Despite the District being under a national lockdown for the first quarter of 2021, levels of NO2 still breach the legal limit. Data from early 2022 suggests that there has been an increase in levels at some sites, however, a full year of data is required to evaluate the NO2 annual average

Figure 4 – Provisional Annual average NO₂ 2021 (Red – exceeds 40ug/m³ limit, Orange >37 ug/m³ near limit)

Monitoring Location	Annual Mean NO ₂ level (limit = 40)
Mayo Avenue	37.6
Mayo Avenue	41
Manchester Road	37.6
Manchester Road	41.4
Queen's Road	48.8
Canal Road	38
Godwin Stret	43.2
Market Street	45.3
Sunbridge Road	38.4
Market Street	37.8
Shipley Airedale Road	50.6
Saltaire crossroads	41.4
Saltaire Crossroads	41.8
Saltaire crossroads	37.9
Low Mill Keighley	44.7
Keighley Road	37.5
Manningham Lane	37.8
Fox corner Shipley	39.1

Subject to Government Audit

The Council will monitor the introduction of the CAZ to ensure that there is no unintended traffic displacement. Other metrics are included in the CAZ monitoring programme, in addition to the Government's national 'deep dive' evaluation programme that includes Bradford. The Council provides a CAZ monitoring report to the Government on a quarterly basis.

3.5 CAZ Health Impact Assessment (HIA)

Born in Bradford (Bradford Health Research Institute) has been awarded £1.1m NIHR funding to undertake a health impact assessment (HIA) of the CAZ. This is the only CAZ HIA being undertaken and has been described by the Government as a project of national significance.

BiB is currently working with 20 schools in the District with projects including pupils monitoring air quality and exposure, creativity labs and citizen scientist, which saw pupils come to City Hall to present their solutions for improving air quality in front of the TV cameras for BBC Look North.

BiB is currently carrying out analysis that estimates that there will be a significant reduction in emergency admissions to hospital from heart disease, respiratory illness, COPD and asthma due to the introduction of the CAZ, which was provide a substantial cost saving to the NHS.

BiB has recently undertaken a survey of 1,770 families in the District showing a 71% support level for the CAZ.

BiB has produced a video of the work they are undertaking in respect of the CAZ which can be found on the following link - [Born In Bradford - Documentary \(A New Generation\) #AirPollution - YouTube](#)



The Chief Medical Officer, Chris Whitty, visited Bradford in March this year (see picture below) and was specifically interested in the CAZ and the HIA. He has requested that BiB provided a full chapter for the 2021 Chief Medical Officers Report.



Chris Whitty, Bradford, March 2022

3.6 CAZ Communications

The Council is carrying out ongoing communications regarding the CAZ, in line with the Clean Air Communications and Stakeholder Engagement Plan that is approved by the Government.

The Council has a dedicated website called Breathe Better Bradford - <https://www.bradford.gov.uk/breathe-better-bradford/breathe-better-bradford/>

The website includes information on the grant and exemption programmes, links to the Government Vehicle Checker and information on how to pay to enter the CAZ if needed. Other information, including reports and links to related projects can also be found on the website. The website has 76,000 users with over 550,000 page views, with clear peaks in activity related to communications activity and programme launches.

The CAZ publicity programme includes a variety of media approaches such as radio adverts, billboards, press releases, social media, newsletters, bus & rail advertising and geo-fenced targeted messaging. Examples of publicity material are shown in figure 5. The communication timelines for the launch of the CAZ are shown in figure 6.

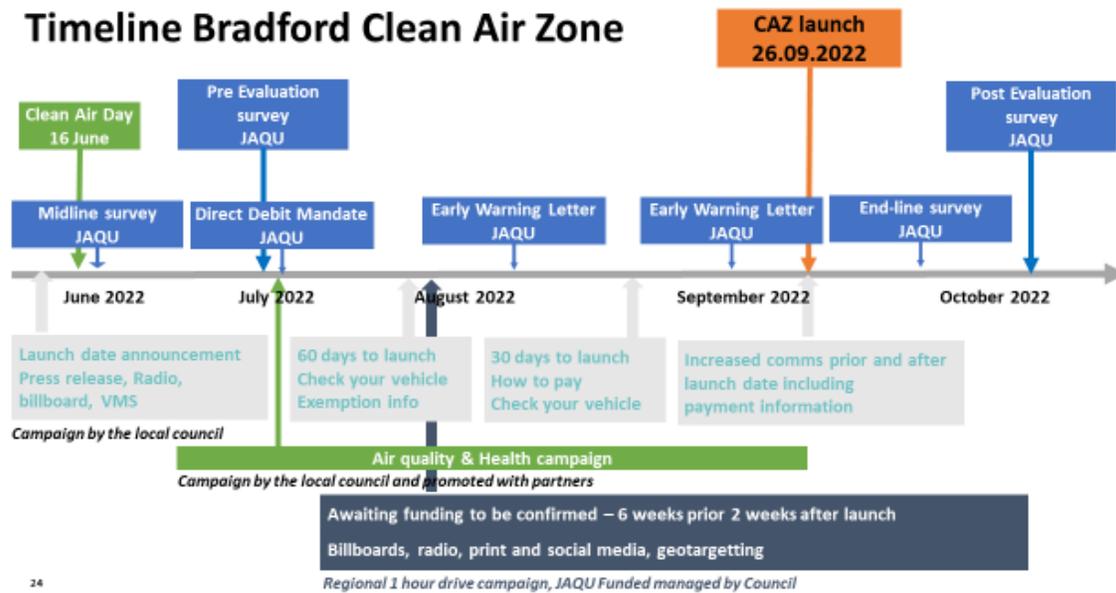
Figure 5 – Publicity material



The Council can confirm that additional funding of £300,000 has been confirmed by the Government to raise awareness of the CAZ within a one-hour drive time.

Figure 6 – CAZ communication timelines

Timeline Bradford Clean Air Zone



3.7 Charging Scheme Order (CSO)

The CAZ Charging Scheme Order (CSO) provides details of vehicles affected by the CAZ, levels of charging and exemption provisions. The CSO also includes details regarding projects that will be funded through any excess revenue received from the CAZ. The draft CSO is being advertised for 6 weeks with comments invited. This is not a consultation on the CAZ but on the provisions contained in the draft CSO - <https://bradford.moderngov.co.uk/mgConsultationDisplay.aspx?ID=458>

3.8 Climate Emergency

The Clean Air Plan will reduce greenhouse gases by an estimated 150,000 tonnes over the life of the CAZ. This is one of the most significant climate change projects in the Yorkshire and Humberside Region

The Bradford Clean Air Plan was given the LGC Climate Response Award 2021 for the integrated response to tackling air quality, health and reducing greenhouse gas emissions.

The Clean Air Plan delivery has been shortlisted under the Climate Response category again for 2022.



4. FINANCIAL & RESOURCE APPRAISAL

The £41.2m delivery of the CAZ has been entirely funded by Government under the New Burdens Funding regime, where Government places a new burden on a local authority.

Revenue from the CAZ will pay for the operation of the scheme and any excess funding is required to be spent on projects and programmes that are outlined in Annex 3 of the Charging Scheme Order.

5. RISK MANAGEMENT AND GOVERNANCE ISSUES

The Clean Air Programme (CAP) is governed by the CAP Programme Board that meets on a monthly basis. The CAP Board reports to the Health & Wellbeing Committee and to Council Executive Committee.

The Council maintain a CAZ risk RAID log that is reviewed on a weekly basis with the Government and discussed at CAP Programme Board meetings

6. LEGAL APPRAISAL

Following the decision to implement the CAZ by Executive Committee decision of the 2nd March 2021 a Charging Scheme Order (“CSO”), to be made under the Transport Act 2000, has been drafted and is currently undergoing a six-week consultation period. The CSO will be made after consideration of the consultation responses in order for the CAZ to be brought into operation on the 26th September.

7. OTHER IMPLICATIONS

7.1 SUSTAINABILITY IMPLICATIONS

The Clean Air Plan and CAZ are central to Council plans for a Clean Growth, sustainable district

7.2 GREENHOUSE GAS EMISSIONS IMPACTS

The Clean Air Plan will reduce greenhouse emissions by 150,000 tonnes over the life of the CAZ, one of the most significant projects in the Yorkshire and Humberside Region

7.3 COMMUNITY SAFETY IMPLICATIONS

None identified

7.4 HUMAN RIGHTS ACT

The United Nations Human Rights Council has declared that clean, healthy and sustainable environment is a human right

7.5 TRADE UNION

None identified

7.6 WARD IMPLICATIONS

The CAZ is predicted to improve air quality in all Wards in the District

7.7 AREA COMMITTEE ACTION PLAN IMPLICATIONS (for reports to Area Committees only)

N/A

7.8 IMPLICATIONS FOR CHILDREN AND YOUNG PEOPLE

[To include details of health impacts on children and young people

7.9 ISSUES ARISING FROM PRIVACY IMPACT ASSESMENT

[To include details regarding data protection and privacy impact assessment etc]

8. NOT FOR PUBLICATION DOCUMENTS

➤ N/A

9. OPTIONS

Not applicable

10. RECOMMENDATIONS

10.1 That the information provided in the report be noted

11. APPENDICES

None

12. BACKGROUND DOCUMENTS

- i) Ministerial Direction 2020 – [Environment Act 1995 \(City of Bradford Metropolitan District Council\) Air Quality Direction 2020 \(publishing.service.gov.uk\)](#)
- ii) Council Executive Committee Report on the CAZ, 2nd March, 2021