

Dr Thérèse Coffey MP  
Parliamentary Under Secretary of State for the Environment  
Department for Environment, Food & Rural Affairs  
Seacole Building  
2 Marsham Street  
London  
SW1P 4DF

16th July 2019

Ref KB/TW

Dear Dr Coffey,

**Greater Manchester Clean Air Proposals**

Thank you for the letter of 9 July.

In March this year, Greater Manchester submitted to government a comprehensive Outline Business Case to reduce nitrogen dioxide (NO<sub>2</sub>) levels on local roads in as short a time as possible.

Despite the urgency of the task to clean our air, we are concerned that we have only now – nearly four months later – received a response. However our greatest concern and that of my colleagues is reserved for the treatment of our carefully designed plan in your letter and the accompanying ministerial direction, which will have profound consequences for the communities and businesses of Greater Manchester.

In taking the decision to devolve the responsibility for the preparation of Clean Air Plans, we had understood that Government had sought to ensure that local conditions would be properly addressed, whilst tackling exceedances in NO<sub>2</sub> levels. It is clear from the letter and Direction that the current framework is failing in this regard. Therefore we would like to request an urgent meeting with you and the Secretary of State to discuss how we can establish a new model of working to ensure that we meet our responsibility to our communities in a comprehensive way.

As we all now know, poor air quality is the largest environmental public health issue facing the UK, with air pollution estimated to contribute to the equivalent of 1,200 deaths in Greater Manchester each year. We are clear that the success of our city-region depends on the health of its population which is why, through devolution, we are committed to achieving the greatest and fastest improvement to the health, wealth and wellbeing of the 2.8 million people who live here.

All of our local authorities have worked swiftly and productively together to produce a joint plan to meet accelerated government deadlines. Our plan and our policy approach balances our duties as local authorities within the wider public policy framework. Unfortunately, the air quality challenge has only been made harder by government's previous approach of largely ignoring the NO<sub>2</sub> issue until legal actions forced a change in national policy.

In developing the Greater Manchester Clean Air Plan, extensive work was carried out by Greater Manchester local authorities - in partnership with local business and communities and your departmental officials - to develop a deliverable package of measures to tackle the health threat posed by roadside NO<sub>2</sub> issue as quickly and effectively as possible, while also protecting and supporting our local economy.

GMCA, Churchgate House, 56 Oxford Street, Manchester, M1 6EU

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This is demonstrated by the comprehensive nature of our plan, which is the most ambitious in the UK and which covers an area of around 500 square miles. It goes significantly further than the guidance initially offered by Government – a clear indication of the seriousness of our intent to tackle this public priority.

Our proposals included implementing a Clean Air Zone from 2021 that would initially mean that buses, coaches, HGVs, taxis and private hire vehicles that do not meet emission standards would be required to pay a daily penalty to drive in Greater Manchester, with non-compliant vans and minibuses affected from 2023, when the availability of compliant vans on the second hand market will make switching a viable option.

However, recognising the potential impact on local business and communities, a fundamental part of our proposals was the need for a modest amount of funding for an upgrade programme to clean up the city-region's bus, coach, minibus, HGV, taxi, private hire and van fleets over the next two to four years as well as significant investment in 600 new public rapid electric vehicle charging points across the city-region – nearly trebling the size of the GMEV electric charging network. This is not a speculative bid for funding but rather a fundamental component of a realistic package-based approach. Our ongoing engagement with local businesses has reinforced the crucial importance of clarity on all aspects of the plan to help them plan for this change in their operating conditions.

Further, in your letter you state that the Greater Manchester proposals would achieve compliance in the shortest possible time. So it is unclear why you have chosen to issue a ministerial direction to force the implementation as soon as possible of a Category C charging Clean Air Zone for the whole of Greater Manchester. These two positions are entirely inconsistent and add to the overall impression of confusion within government and the lack of clarity that is compounding an already challenging issue.

This direction would mean that all buses, minibuses, HGVs, taxis and van fleets that are not compliant would be subject to a charging regime imposed by Government, regardless of any local views or consultation.

Your letter provides absolutely no assurances for our businesses and communities about any financial support to help transition to cleaner vehicles, meaning that rather than having cleaner vehicles on our roads, the government would in effect be penalising residents and businesses who acted in good faith and followed previous government guidance to purchase diesel vehicles. This is clearly unacceptable and unfair and we believe is in direct contravention to the policy framework that government has agreed.

We are keen to ensure that both you and the Secretary of State fully understand the consequences of your direction for Greater Manchester. In effect, your actions will mean:

- For large and small bus operators across Greater Manchester, we estimate they will have to replace 1350 non-compliant buses in the next 18 months to avoid a charge, which will significantly undermine an already precarious bus network. Further, you provide no assurances about our proposed £29m GM Clean Buses Fund.
- For those haulage companies, and those that operate mini-buses and coaches, it means that they will have to pay a daily charge for non-compliant vehicles 18 months from now, with no clarity regarding financial support through the proposed £59m GM Clean Freight Fund
- For small and micro businesses that use non-compliant small vans for their work, it means that they will have to pay a daily charge 18 months from now, rather than the Greater Manchester proposed timeframe of 2023, and no certainty about financial support.
- For taxis and private vehicle operators, of which there are at least 5500 non-compliant vehicles operating across GM, it means that they will have to pay a daily charge 18 months from now, with no clarity on financial support.
- For those business that have started the transition of their fleets to electric vehicles, it means that their options to make the transition to cleaner vehicles will be restricted, due to no funding being available for GM proposals to treble the number of electric charging points across Greater Manchester.

However, the narrow approach now advocated by DEFRA and DfT – which effectively imposes charges on businesses first with no certainty over support – may in reality keep the most polluting vehicles on our roads for longer and continue to impact on the health of our population. It also seriously undermines wider government policy to support businesses and growth and is tantamount to taxing our businesses, whilst giving nothing in return. This approach also contravenes government's stated commitment to devolution and partnership working with local authorities.

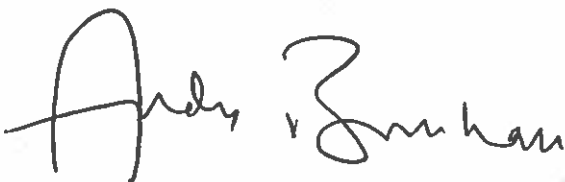
We want to be clear that Greater Manchester is willing to take bold steps to clean up our air as quickly as possible. But this cannot place a significant financial burden on the back of hard working businesses and our local communities.

We also reiterate our urgent request for government to take action to require Highways England to tackle the NO<sub>2</sub> exceedances on the Strategic Road Network that is so damaging for our communities. It cannot be right that local authorities are required to act whilst government continues to overlook the serious health impact on our citizens caused by their Strategic Road network.

Poor air quality is a problem that affects us all, which is why it requires carefully co-ordinated national and local action. But central government must do much more than just impose charges on local businesses, to clean up a problem partly of its own making.

Taking responsibility means central government funding the transition to clean fleets; it means government developing national solutions for national problems, it means legislating now – not in the uncertain future – so we can better manage our roads and improve taxi and private hire standards; and it means mandating Highways England to take appropriate action across their motorway network

We would welcome the opportunity to meet with yourself and the Secretary of State for Environment at the earliest opportunity.



Andy Burnham

Mayor of Greater Manchester



Councillor Andrew Western

Leader of Trafford Council and Greater Manchester Portfolio Lead for Green City