

Rt Hon George Eustice MP
Secretary of State for the Environment
DEFRA

2nd June 2022

Dear George

Greater Manchester Clean Air Zone

We are extremely disappointed and surprised to receive your letter which seeks to dismiss Greater Manchester's developing plan for a non-charging category B Clean Air Zone (CAZ) and instead to continue to push Greater Manchester to implement a charging Category C CAZ. It would also appear somewhat premature, given Greater Manchester's revised plan is due to be submitted to government on 1 July.

Firstly, we wish to be clear that Greater Manchester Leaders take the issue of poor air quality and the health impacts very seriously, and are fully committed to discharging our legal and moral obligations to tackle this problem.

During the recent elections, your Conservative MPs and council candidates across Greater Manchester promised to scrap any form of charging CAZ. Your letter confirms the truth however, that it is your Government's policy to impose a charging CAZ on Greater Manchester, as you have done to other cities.

As you will be well aware, it was your Government that issued a legal direction on all ten Greater Manchester councils which required every district to take action to reduce emissions by 2024, and effectively dictated the size and charging nature of the original scheme.

At every stage, Greater Manchester has been required to follow all parts of your statutory guidance, including approvals by officials and by Ministers.

You will recall that we presented evidence to you and your Minister, when we met in January, that 2024 was unachievable given the economic situation following the pandemic. The Government's position was to extend the date by one year to 2025, which was unacceptable to us as it would still have required a charging scheme. We held out for 2026 and were pleased when the Minister agreed. This was important because it enabled a non-charging scheme and we are at a loss as to why you have not taken this into account and are insisting on a charging scheme.

In this way, we left our discussions with confidence that we could develop the right plan to clean up our air in line with this direction, without further economic impact.

Building on this position, we instructed our officials to continue their work with your officials to best understand the projected air quality problem. In order to meet your 1 July deadline, we agreed a process to develop modelling and we continue to work with your officials to progress this.

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

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Over the past month, our officials have shared high-level modelling on the shape and nature of NO2 exceedances across Greater Manchester to achieve compliance in the shortest possible time and by 2026 which clearly supports our stated preference for a non-charging, category B investment led approach.

This modelling demonstrates that points of exceedance in the City Centre are caused not by LGVs – which represent only between 4% and 15% of NO2 emissions and instead that the remaining problem will principally derive from Category A and B vehicles, for which we have developed targeted investment plans, including securing over £150m investment in zero emission buses outside of Clean Air Funds.

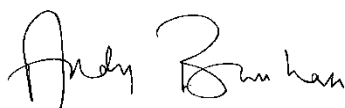
For government to seek to impose a Category C Clean Air Zone demonstrates no understanding of the nature of the air quality problem in Greater Manchester and would fundamentally damage our economy.

Your letter references what, in the absence of evidence, we assume can only be an arbitrary reduction of the previous Greater Manchester Clean Air Zone (designed to comply with your legal direction) by 95%. This demonstrates that government has no understanding of the economy of Greater Manchester which sees vehicles from across the conurbation trading in the city centre. Nor does it acknowledge that tens of thousands of vehicles from across Greater Manchester would still require the right level of support via a financial incentive scheme to ensure that they can afford to change vehicles in these challenging economic conditions. Your proposal would see this considerable number of our businesses across Greater Manchester – with 80,000 non-compliant vans across the ten boroughs alone - subject to a daily charge- especially van owners and Taxi and Private Hire drivers which will need to enter the city-centre for their business purposes. That is why Greater Manchester is clear that the right plan needs to be based upon the right investment led financial support scheme.

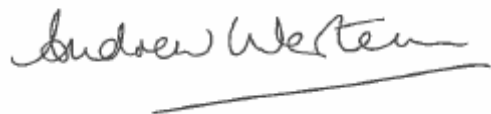
You will be aware that the imposition of a charging Category C Clean Air Zone for the City Centre would require years of further detailed planning. The right non-charging, investment led plan could deliver benefits through the appropriate financial support to those most polluting vehicles to upgrade as soon as possible.

Whilst it appears government wishes to impose charges on Greater Manchester businesses and individuals, our plan will set out how the Greater Manchester's investment-led approach shows this would not be necessary. We will continue to work with your officials to present our evidence for a non-charging category B CAZ and would be very happy to meet with you next week to discuss this further.

Yours sincerely



Andy Burnham
Mayor of Greater Manchester



Cllr Andrew Western
Leader, Trafford Council and Clean Air Lead