



Department
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Andy Burnham, Mayor of
Greater Manchester

Cllr Eamonn O'Brien
By email only

26 January 2023

Dear Andy and Eamonn,

GREATER MANCHESTER NO₂ PLAN REVIEW

I am grateful for the discussion last Tuesday about the Greater Manchester Clean Air Plan. It was very helpful to enable me to understand your position and to set out my aims and legal responsibilities. I hope we can continue with this productive engagement we have started. I agreed to follow up in writing to confirm the request for evidence I, together with Jesse Norman MP, have asked our officials to pursue with TfGM.

The information requested is outlined in detail in the letter of 16 December from our officials, attached for ease. As this sets out, in line with the approach we take with all local authorities, we are asking Greater Manchester authorities to:

- (i) provide modelling results for a benchmark CAZ to address the persistent exceedances identified in central Manchester and Salford, in order for these to be compared against your proposals.
- (ii) Identify a suitable approach to address persistent exceedances identified in your data on the A58 Bolton Road in Bury in 2025, and to propose a suitable benchmark.
- (iii) Set out how the measures you have proposed will be modelled and evidenced overall, and to ensure that they are modelled without any unnecessary delay.

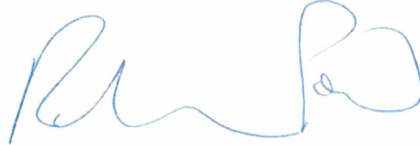
As the letter notes, this evidence is necessary to enable us to review the proposals fully and ensure exceedances are tackled as quickly as possible. The legal obligation is to achieve compliance with NO₂ limits in the shortest possible time. The Greater Manchester plan needs to demonstrate it meets this legal test, that the proposals are deliverable and how your proposed grant schemes would have sufficient uptake to have the desired effects. The current lack of supporting evidence and detail does not enable us to do so. We have requested this further information by 31 January.

You indicated that you will be able to provide some of this information by 31 January but that the CAZ benchmark modelling will take longer. I would be concerned at any timetable that may significantly hold up making progress on approving a plan for Greater Manchester. My team stands ready to work with yours, as they are doing already, to ensure that we have evidence of suitable level of quality taking account of shortened timescales

We are also happy to consider the proposals you outlined regarding using present funding to support electric buses and to open up the funds for taxis and PHVs. I would be grateful if you could provide more details for us to consider. We will need to understand what contribution this will make towards securing compliance as quickly as possible within your plans, how it

can be ensured funds are taken up as expected, and that the levels of funds remain appropriate within our funding frameworks for LAs.

I look forward to receiving the evidence we have requested to enable us to move towards reaching a satisfactory outcome. It is important we reach a suitable conclusion in order to ensure we address the serious impact poor air quality has on both human health and on nature.



REBECCA POW MP



Department
for Environment
Food & Rural Affairs



Department
for Transport

Simon Warburton
Transport Strategy Director
Transport for Greater Manchester
2 Piccadilly Place
Manchester M1 3BG

16 December 2022

Dear Simon

GREATER MANCHESTER NO₂ PLAN REVIEW

Thank you to you, and your team, for the work on the review of your clean air plan and the proposals provided on 1 July. We apologise for the delay in replying. Ministers have now asked us to write regarding next steps.

We note Greater Manchester authorities are now proposing a non-charging scheme, but a lot of detail remains to be developed about how this would work and how it would address some of the most persistent NO₂ exceedances.

It is important to bear in mind that the legal obligation is to achieve compliance with NO₂ limits in the shortest possible time. The Greater Manchester plan needs to demonstrate it meets this legal test, that the proposals are deliverable, and how a scheme would have sufficient uptake to have the desired effects.

At present there are a number of underlying gaps in the evidence meaning it is not possible to understand how the proposed approach will address these points. The full proposal has not been modelled. There is also no comparison, in line with the Government's agreed standard approach with all local authority NO₂ plans, against a suitable benchmark CAZ to demonstrate it is as effective in reaching compliance in the shortest possible time.

As noted in the then Environment Secretary's letter of 8 February, when agreeing to the review, proposals are also expected to work within existing funding allocations, our current funding framework and benchmarks.

We need to be able to review the proposals fully, and ensure exceedances are tackled as quickly as possible. The current lack of supporting evidence and detail does not enable us to do so.

To allow us to consider the proposals further and to assess their effectiveness, Ministers have asked us to request further evidence to enable them to consider the plans further. It is important we have this further evidence provided in a timely manner. We request that you:

- Provide modelling results for a benchmark CAZ to address the persistent exceedances identified in central Manchester and Salford, in order for these to be compared against your proposals. Modelling results for a Central Manchester benchmark CAZ need to be provided as soon as possible and by 31 January at the latest. We would expect the CAZ benchmark to include all the city centre locations predicted to be non-compliant in 2025.
- Identify a suitable approach to address persistent exceedances identified in your data on the A58 Bolton Road in Bury in 2025. Any proposals for tackling these exceedances will also need to be compared against a benchmark option. We have asked JAQU colleagues to discuss with yours to agree a suitable benchmark. Again, we would be grateful for proposals to be provided to us by 31 January.
- Set out how the measures now proposed will be modelled and evidenced overall, and ensure that they are modelled without any unnecessary delay. JAQU colleagues will discuss with yours to agree a methodology and a timeline for delivery of the modelling of the Greater Manchester proposal. We request that a methodology and timetable be provided to us for approval by 31 January.

It is important that we have the right information to confirm suitable proposals and to enable us to move forward quickly to their implementation. We look forward to its receipt. In the meantime, as also noted in the letter of 8 February, we will need to continue work together to ensure that Greater Manchester's ongoing costs are minimised. JAQU colleagues will be in touch to discuss the specific requests and are happy to discuss any further queries.

Yours sincerely



Sally Randall
Director, Environmental Quality, Defra



Claire Wren & Hannah Newell
Directors, Future Transport Systems and
Environment, DfT