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Dr Thérèse Coffey MP
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Cllr Andrew Western
Trafford Council,
Trafford Town Hall,
Talbot Road,
Stretford,
M32 0TH

9 July 2019

Dear Councillor Western,

Greater Manchester Local NO₂ Plan

In July 2017, local authorities in Greater Manchester were directed to conduct a feasibility study and submit, by 31 December 2018, a Final Plan for delivering compliance with legal limits for nitrogen dioxide in the shortest possible time.

I am pleased that the joint study has made progress and looks to be on track to deliver compliance in the shortest possible time. On the basis of the evidence provided to date I am content that Greater Manchester authorities should continue to proceed towards developing the implementation and contract arrangements of a charging Clean Air Zone in Greater Manchester and will provide an initial tranche of £36m of funding now to take this forward. However, we need to work together to address some concerns on the evidence presented to allow approval of the details and further funding awards. I request that you:

- **Submit further options appraisal information (including transport and air quality modelling as well as due regard to economic, financial and deliverability considerations)** that you have been working on prior to public consultation, and by 2nd August 2019 at the latest. Updated analysis is requested that addresses the review panels' and JAQU's concerns particularly around the behavioural assumptions that have been used; and **provides assurance that your Clean Air Zone will deliver compliance in the shortest possible time, and that you cannot achieve compliance earlier than 2024. This 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 Panels' suggestions
 - providing further sensitivity testing on your vehicle upgrade assumptions
 - demonstrating that a Greater Manchester CAZ D cannot bring forward compliance, including outlining the delivery challenges discussed for a GM wide CAZ D;

My officials have already requested this and have been in contact with your officials at TfGM to discuss the detail of this request. This evidence should be used to update the measures. In prioritising your approach to evidence we would expect that these asks would take precedence over the development of the Clean Air Fund/mitigation type measures. This will enable decision-making on what additional measures to the charging Clean Air Zone in 2021 are needed to deliver compliance in the shortest possible time and consider whether any targeted exemptions are appropriate. These additional measures could include the proposed inner ring road CAZ

- **Provide updated Implementation Fund and Clean Air Fund proposals** – I recognise the need to support individuals and businesses affected by the charging Clean Air Zone, and we will provide support for those drivers affected, but this support will be dependent on the measures required to deliver compliance and their impact. I note that you have identified a very significant funding bid and we need fuller justification for each measure identified. As it stands the approach you have taken does not demonstrate the scale of support that is appropriate. The bid maintains that all funding measures are needed to deliver compliance, and does not identify those measures that are needed to mitigate the impacts of a scheme. Therefore, I request you provide updated proposals that are informed by the revised modelling and a clearer understanding of what is specially required to deliver compliance and what is needed for mitigation.
- **Prepare to implement the scheme** - I expect the feedback that has already been fed through to TfGM from JAQU and the independent review panels to be addressed in developing the commercial, financial and management arrangements for the scheme to be outlined in the Full Business Case. The options appraisal should include a detailed delivery timeline and confirmation of delivery and procurement approaches. I note you have discussed with JAQU officials your plans for an 'interim' FBC step, followed by a final FBC in 2021 as part of delegated approvals confirming final costs. I accept the approach outlined is pragmatic in dealing with a scheme of this scale. This interim full business case should be received by 31 December 2019 at the latest setting out how a scheme will be implemented in 2021 and include the costs for CAZ implementation. All public consultation necessary in respect of the scheme identified in the full business case should also have been completed.

To ensure delivery of NO₂ compliance in the shortest possible time, I attach to this letter a Ministerial Direction requiring Greater Manchester councils to implement a charging Clean Air Zone Class C (without a van exemption until 2023) with additional measures; and for local authorities to jointly submit to JAQU revised evidence and by 2 August and a Full Business Case by 31 December at the latest.

I also note your Outline Business Case contained a number of wider asks for Government that I should also address.

Clear arrangements and funding to develop workable vehicle renewal scheme/upgrade Measures; and the replacement of non-compliant buses. We are already liaising with you about your proposed vehicle renewal schemes. While we are not proposing to take forward a national scrappage scheme at this time, we have not restricted the types of measures local authorities could bid for from our Clean Air Fund. It is open to you to propose a local scrappage scheme, as I know has been considered, including considering the needs of the bus sector and taking account of the comments above.

Action to tackle the air quality impact of the SRN in the region: Highways England are working up plans for exceedances identified by national modelling on their network. While this is not expected to include charging on the SRN, Highways England are looking at a range of measures such as traffic management, speed limits and barriers. They are also working with Local Authorities to understand the impacts of the local air quality plans and

maximise the benefits. I know JAQU officials have facilitated senior engagement between TfGM and Highways England on your plan, and to also discuss the role of the £100m Air Quality Designated Fund and Greater Manchester proposals. I would encourage that senior engagement to continue.

Short-term effective interventions in vehicle and technology manufacturing and distribution, led by central Government with local authorities. The Road to Zero Strategy sets out a clear pathway to zero emissions, to give clarity and certainty to both industry and motorists. By 2030 the Government wants at least half of new cars sold, and as many as 70%, to be ultra low emission, alongside up to 40% of new vans. Our mission is to put the UK at the forefront of the design and manufacturing of zero emission vehicles, and for all new cars and vans to be effectively zero emission by 2040. We are investing nearly £1.5bn between April 2015 and March 2021 to do so. Along with the measures in our strategy, this adds up to one of the most comprehensive support packages in the world. Local authorities have a crucial role to play and earlier this year OLEV announced funding awards to Greater Manchester for electric buses and taxi/PHV charging infrastructure.

Reform of taxi and private hire legislation to enable licensing authorities to enforce minimum standards and manage out-of-area operation: The Government response to the report by the Chair Task and Finish Group on Taxi and PHV Licensing set out the thinking on the control of taxis and PHVs working in an area other than that in which they are licensed. The Chair recommended that all journeys start and/or end in the 'home area'. Government agrees with the principle of this recommendation, and will consider further (with a view to legislation) how it might best work in detail. The Government also agrees that there should be national minimum standards for taxi and PHV licensing, and that there should be national enforcement against these standards, and will legislate for this when time allows. In the interim, Government will continue to review its statutory and best practice guidance.

Powers to act on congestion, including moving traffic offences: My officials have discussed with the Department for Transport, and there are no current plans to enable local authorities outside London to enforce moving traffic offences. These offences remain a matter for the police, who may issue Fixed Penalty Notices accordingly.

Rail devolution and action on outstanding rail commitments in relation to the Northern Hub: I am aware these are longstanding issues and are being discussed with the Department for Transport and addressed on various fronts. I would encourage you to continue this engagement.

I have requested to be kept closely informed of your progress over the coming months and look forward to receiving your evidence and Full Business Case. Thank you for your efforts in getting to this stage.

I have copied this letter to the Leaders of each of the ten Greater Manchester authorities and the CEO for the GMCA.

Yours sincerely,



DR THERESE COFFEY MP