

Rebecca Pow MP
Parliamentary Under Secretary of State
Department for Environment, Food and Rural Affairs
Seacole Building
2 Marsham Street
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08 April 2020

Dear Minister

I write further to your letter received on 18 March, regarding next steps with Greater Manchester (GM)'s Clean Air Plan proposals. My response to your letter is made with advice from TfGM ahead of a formal discussion with my Local Authority colleagues.

I welcome the confirmation that you are satisfied with the additional options appraisal evidence with the main evidence queries having been suitably addressed, recognising there are some further technical clarifications that are needed for final assurances; and the steps forward that are contained within your letter. In particular, I noted that your letter outlines:

- the government's desire for GM to consult on a Class C Clean Air Zone (accepting our case for exempting LGVs to 2023) with the timings of reporting back on the consultation suggesting that this activity is expected to take place in the summer;
- that the government will provide an initial tranche of funding of £41m for grants or loans – and that this is broken down as £15.4m for bus retrofit, £10.7m for PHVs, £8m for HGVs, £4.6m for coaches and £2.1m for minibuses; and
- that there is an expectation that GM's Clean Air Zone will be introduced in 2021 so compliance with NO₂ legal limits is met in 2024.

Whilst the initial tranche of funding is welcome along with the acceptance of our case for 2023 being the earliest point possible to bring LGVs into the scope of the charging Clean Air Zone, there are a number of aspects within our Plan that your letter has not yet been able to provide certainty over.

Firstly, I have noted that the initial release of funds outlined in the letter does not currently set out an offer of funding for Hackney Carriages as proposed by Greater Manchester, however, I do note the intention to review this further with GM officials. Further development of this funding ask is crucial if consultation on our plan with the taxi trade is to be progressed in a fully informed manner.

I also noted that the initial release of funds outlined in the letter does not currently set out an offer of funding for the business community that relies on the 70,000+ LGVs in operation here in Greater Manchester. Again, I must encourage the work on this aspect to progress quickly so funding can be forthcoming as soon as possible, so as to ensure that bureaucratic delay does not use up the valuable time that could otherwise be available to enable vehicle replacement to happen, following your agreement to exempt Category C vehicles to 2023.

The funding for buses in your letter will provide the basis for developing a model to retrofit the circa 1,000 buses in Greater Manchester that are capable of being converted. However, there remain a further 600+ vehicles for which there are no accredited retrofit options. We

anticipate the parallel funds for ultra-low emission buses, announced in the March Budget Statement, may provide a source for this funding requirement, but we would welcome early confirmation that this is the case. Similarly, we would welcome clarification from JAQU, to help us to secure funding for Electric Vehicle charging infrastructure. I note that £500m was awarded to OLEV in the March Budget Statement.

Finally, we need to ensure that funding routes remain open to the other elements in our Plan that have not been supported by the letter, including the proposed Clean Air Hardship Fund; and the mobilisation/delivery costs for vehicle funds; and there remain outstanding issues regarding specific locations on the Highways England trunk road network that will be crucial to a coherent consultation proposal.

I note that your letter and the accompanying direction were dated 16 March, before the enactment of the Coronavirus Act 2020. Clearly since this time the focus of the nation has shifted dramatically to responding to the global COVID-19 pandemic. As a result, GM colleagues are working to understand the wider impacts of the coronavirus outbreak on this programme of work.

Most immediately, I would like to highlight the timing of GM's consultation, which is assumed in the letter to be taking place in the summer. The planning for this activity cannot be progressed until there is more clarity around the implications of the national response to coronavirus.

As you will appreciate, whilst the government has made a number of financial packages available to businesses and the self-employed in this extraordinary situation, our residents and businesses are rightly focused on ensuring they and their families and employees stay safe. In addition, we are very aware that the impact of pandemic management policies will be felt very strongly within the taxi trade. Furthermore, conducting a consultation in this lock down situation would seem inappropriate as many consultees may not have the opportunity or capacity to consider and respond to the proposals in a meaningful way as required by the public law principles of fair consultation.

Therefore, the proposition of consultation during this immediate period would not seem either viable or appropriate. Nonetheless, we remain committed to meeting our clean air obligations at the earliest opportunity and will be ready to continue to work as the circumstances change.

In doing so, we will also need to be mindful of the significant changes that could result from these exceptional times. We know that the transport sector has already been hugely impacted by the epidemic, and government policies to stem its spread; and its ability to recover from significant revenue loss whilst also being expected to renew fleet to respond to pre-pandemic policy priorities requires further thought and consideration. Therefore, the groups most affected by our Clean Air Plan may need even further assistance than we had anticipated at the time of our previous submission to Government.

More broadly, there will be wider economic impacts that may be sustained and that could significantly change the assumptions that sit behind our plans. Our officials have begun to consider this; and it is highly likely that we will need to update you and the JAQU team as the picture becomes clearer over time. I note that in recent days the JAQU team have made contact with TfGM to clarify that they understand that COVID-19 may impact our ability to progress this work and deliver to previously agreed timelines. They have also confirmed that they do not wish to create additional burdens on Local Authorities at this time. We understand they are committed to keeping an open dialogue with us keeping the situation under regular review, this position is welcomed.

Finally, we remain committed to continue to pursue dialogue with Government on supporting measures that we consider important in achieving plan outcomes, namely powers to act on congestion including moving traffic offences, and reforms to taxi and private hire legislation, in particular to end the practice of out-of-area operation which currently prevents effective local regulation of agreed standards for private hire services.

I hope that this letter helps to show that our commitment to clean air remains strong. However, given the extraordinary circumstances that will remain for some time, I hope that we can continue to work closely to ensure that its achievement is reached in a pragmatic and adaptable manner.

Yours sincerely,



Cllr Andrew Western

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