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**ANDY BURNHAM**

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**MAYOR OF  
GREATER  
MANCHESTER**

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Rebecca Pow MP  
Parliamentary Under Secretary of State  
Minister for Environmental Quality and Resilience  
2 Marsham Street  
London  
SW1P 4DF

10 February 2023

Dear Minister Pow,

We write further to your letter of 26 January, following our meeting on 17 January. We share a commitment to tackle the significant public health issue of Nitrogen Dioxide (NO<sub>2</sub>) exceedances and associated poor air quality.

As we set out in the meeting, Greater Manchester Leaders aim to deliver this in a way that minimises any financial hardship on the livelihood of businesses and residents in Greater Manchester, considering the cost-of-living crisis. That is why we have submitted a case for a non-charging investment led plan for our city-region. We believe an investment led approach to invest in vehicle upgrades, rather than imposing daily charges and in particular through the delivery of zero emission buses in the Bee Network (a London-style integrated transport network) is effective at reducing NO<sub>2</sub> and will deliver compliance in the shortest possible time. The new plan would ensure that the reduction of harmful emissions is at the centre of GM's wider objectives.

As we set out in the meeting it is disappointing the amount of time it has taken time for Government to respond and that we haven't received a formal, detailed reply to our submission but have instead been asked for more evidence, as follows:

- (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.*

We note that the Government updated the [Clean Air Zone Framework](#) on 6 October 2022 and the revision has removed the concept of a non charging clean air zone and therefore we are assuming your use of the term clean air zone in (i) is specifically asking us to benchmark a charging scheme. Whilst the concept of a non-charging zone has been removed, we note that Authorities remain able to identify measures other than charging zones that are at least as effective at reducing NO<sub>2</sub> and that those measures should be preferred, which aligns with Greater Manchester's case for an investment led non-charging Clean Air Plan.

In respect of point (ii) we enclose a draft report that identifies a suitable approach to address persistent exceedances identified on the A58 Bolton Road in Bury. We ask that you note the document is submitted as a draft, subject to any comments of the ten Greater Manchester local authorities, and at the next Air Quality Administration Committee, we will confirm the final submission and notify you of the change in status.

With regards to point (i) and the requirement to benchmark a CAZ to address the persistent exceedances identified in central Manchester and Salford, we have concluded from this request that you are content that there are no exceedances in Bolton, Bury, Oldham, Rochdale, Stockport, Trafford, Tameside and Wigan that require benchmarking and therefore addressing through a charging Clean Air Zone.

As we outlined in our meeting, to undertake this work will require GM to update its modelling tools which since the submission of the Outline Business Case in March 2019 Greater Manchester Authorities have not needed to consider a regional centre charging CAZ.

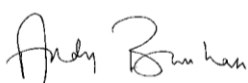
This update is important because drawing conclusions on the performance of differing schemes without a robust evidence base will inevitably lead to additional work later and increases the risk of legal challenge. There are a number of critical aspects that require updating and/or confirming to represent a regional centre charging CAZ:

- Definition of the exact specification of the CAZ including boundary;
- Review of all evidence on city centre CAZ research and appraisal, which has been undertaken and published since the submission of the Outline Business Case in March 2019;
- Analysis of vehicle trip frequencies into the defined CAZ boundary;
- Testing and assurance of model tools and outputs.

We would request that the Joint Air Quality Unit (JAQU) identify and share any pertinent evidence or data sources as a matter of urgency to assist in updating GM's models. In the interim, our team will work with yours to determine the parameters of the benchmark. In terms of timing, it will take a number of months for the modelling tools to be updated, the benchmark to be run and the outputs to be governed and we anticipate that the activity for points (i) and (iii) will be concluded by the end of June 2023.

We welcome the opportunity for officials to explore utilising Clean Air Funds to support GM's ambitions with regards to Zero Emission Buses and that you would consider opening up the funds for taxis and private hire vehicles. We will provide you with details of our proposals in due course.

Greater Manchester Leaders believe that the investment led non-charging Clean Air Plan is effective at achieving compliance with NO<sub>2</sub> limits in the shortest possible time. We will submit the evidence requested that will enable you to endorse the proposed approach so there will be no need for a charging Clean Air Zone in any Greater Manchester borough.



**Andy Burnham**  
Mayor of Greater Manchester



**Eamonn O'Brien**  
Leader of Bury Council & GM Portfolio Lead for Clean Air