

Andy Burnham
Mayor of Greater Manchester
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30 June 2021

Dear Mayor Burnham

Greater Manchester Clean Air Zone (CAZ)

Following recent press reports that the Greater Manchester Clean Air Zone is now scheduled to begin from 30 May 2022, I write to express our continued grave concerns over the misguided approach and damaging impacts arising from the proposed CAZ.

Whilst we support the overall objective to improve air quality, we strongly believe that the approach taken via the Euro VI only diesel-vehicle compliance requirement is too blunt an instrument that will cause unnecessary economic harm to the businesses that serve the Greater Manchester area.

We are particularly concerned that the extent of the Clean Air Zone area within Greater Manchester is disproportionate and not justified given the “hot spots” identified from your available data.

The impact arising from the vehicle asset devaluation is ruinous for many small businesses, and we are disappointed that this is not adequately addressed. We do not accept the premise that SME businesses, which become unviable because they are unable to benefit from the limited financial support available, are dispensable.

Your approach also overlooks the substantial investment already made by business to improve air quality prior to CAZ policy being conceived. We point out again that, thanks to the £1.9bn investment made by road hauliers, NO_x emissions from HGVs have fallen by over 60% since 2013.

Having reviewed the recently-published analysis by AECOM on the CAZ consultation responses, it is not clear why taxis and private hire vehicles have been given a further one-year exemption until May 2023 yet HGV operators are overlooked. Given the collapse in vehicle replacement cycles due to the Covid pandemic, HGV operators also need additional time to upgrade their vehicles. In the circumstances therefore, I would be grateful if HGVs could be included in this further exemption.

We understand the need to improve air quality, especially in those places with high pollution levels. We think there are more sustainable ways to tackle overall air quality objectives. To avoid wholesale disruption across business and in people’s lives, we ask that you adopt a more sensitive approach by applying the following three proposals.

First, the charging CAZ area should be restricted to where that intervention will have the most immediate impact in reducing NO_x emissions as quickly as possible. Based on your published data, this would be within an area bordered by the Mancunian Way / A635 / A665. Given the resolve to impose financial charges on those vehicles deemed “polluting”, an equitable solution would be to make this area a CAZ D.

Secondly, throughout the rest of Greater Manchester, policy should be targeted at retiring the most polluting vehicles – we recommend Euro IV diesels and older – and will stretch available

funding offered to the owners to upgrade to newer vehicles. Together with investment in infrastructure to ease congestion, we believe this to be a more cost-effective and even-handed way to use limited public funds to realise the twin benefits of improved air quality and enhanced productivity.

Finally, we ask that you permanently exempt newer, currently non-CAZ compliant, coaches from charges when entering Manchester. We suggest exempting CAZ charges for coaches that are Euro V (or those with a "10" or "60" or newer number plate if that is simpler to implement).

This positive measure is needed for two reasons. First, the Joint Air Quality Unit (JAQU) CAZ framework failed to distinguish between coaches & buses. Coach lifespans, their use-case, and the options for retrofit are radically different from buses – all of which, we regret, was ignored by the JAQU assessments. Complete compliance in Manchester at Euro VI is impossible for many years. Our estimate, based on Department for Transport vehicle data (VEH0611) is that between 26 – 31% of coaches are Euro VI & compliant with the zone - the rest will not be. Secondly, coach operators are committed to achieving clean air but, along with hospitality, is a sector that has been devastated by the pandemic.

This limited permanent exemption will not markedly impact the drive for cleaner air. The National Atmospheric Emissions Inventory shows that coaches represent a negligible fraction (less than 1%) of the overall air quality challenge. The exemption will result in more Euro V coaches but that will be balanced by fewer Euro IV and older coaches. The risk to achieving air quality targets is immeasurably low, while the benefits to the city during COVID re-opening are significant.

We also highlight that all coaches entering Manchester will be meeting the needs of the tourist and education sectors as we come out of lockdown. This is vital as VisitBritain is forecasting inbound UK visits in 2021 to be less than half of the 40.9 million visits the UK enjoyed in 2019. We believe that every opportunity should be afforded to allow both the coach sector and the tourist trade within Manchester to recover by facilitating domestic tourism.

I look forward to receiving your reply soon to assist the industry in its recovery.

Yours sincerely



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cc. Duncan Buchanan – RHA Policy Director, England & Wales
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