

Rt Hon Thérèse Coffey MP  
Secretary of State for Environment, Food and Rural Affairs  
By email [secretary.state@defra.gov.uk](mailto:secretary.state@defra.gov.uk)

14 November 2022

Dear Secretary of State,

RE: Greater Manchester Clean Air Plan

We are the largest clean air coalition in the UK, representing charities across health, transport and environment. Air pollution affects us all. It is the largest environmental threat to human health and is responsible for up to 36,000 premature deaths each year in the UK. Toxic air has been shown to stunt the lung growth of children, as well as making life harder for people with existing medical conditions and causing new illnesses, such as cancer.

We write ahead of your decision on whether to accept the revised plan submitted by the Greater Manchester Combined Authority (GMCA) to address the illegal levels of nitrogen dioxide across the city region. The new plan proposes to remove the proven charging element of a Clean Air Zone for the most polluting vehicles, which the authority's own evidence has shown would be the most effective route to legal compliance. The new plan proposes to replace this charging element with a voluntary approach, with the aim of encouraging owners of older, more polluting, commercial vehicles to retrofit or upgrade to cleaner vehicles. This represents the further watering down of a plan that many already considered to be weak; the previously agreed proposals did not impact private cars even though they are a significant source of emissions in the region.

Dirty air already contributes to more than 1,000 early deaths a year in Greater Manchester and lifelong illness for many people, starting at an early age. The city region has also breached legal air quality limits for more than a decade. In fact, recent data from the Government shows that Greater Manchester worryingly registered higher levels of nitrogen dioxide in 2021 than before the pandemic in 2019. This is why it's hugely disappointing that Greater Manchester's leaders are doubling down on a voluntary approach, which the councils' own modelling shows would do less to protect people's health from air pollution and would leave the city region with illegal levels of nitrogen dioxide for another four years. Clean air is not 'a nice to have' but something that is essential for people to be able to lead healthy and fulfilling lives.

The rationale put forward by the GMCA for a revised Greater Manchester Clean Air Plan argued it is about the economy but fails to recognise that toxic air in the region already costs the local economy £1 billion every year, with every single district affected. It is also concerning that not a single civil society group, patient group, health or environmental NGO

was listed by the GMCA in its report as having been engaged to validate the evidence and conclusions of their proposed approach.

We believe the GMCA is doing some great work to transform public transport in the region, with support from the Government, and we agree that incentives and financial support are needed but, as the Government's plan acknowledges, this is not enough on its own to address the air pollution crisis we face. The Government's own analysis and other UK city leaders have shown that a Clean Air Zone, with charges, is the most effective and timely tool at reducing nitrogen dioxide pollution.

It is our expert belief that at minimum a charging CAZ is needed in the city centre region, together with help and support for people and businesses across the city region. A wholly voluntary approach will lead to more illness and deaths and associated loss of productivity for the economy in Greater Manchester that could otherwise be prevented, as well as delaying efforts to achieve legal compliance in the UK in the shortest time possible.

We urge you to place people's health and wellbeing at the heart of your decision. Please ensure the region's Clean Air Plan is not weakened so that we deliver clean air as quickly as possible.

Yours faithfully,

Kyle Lischak, Head of UK, ClientEarth

Henry Gregg, Director of External Affairs, Asthma + Lung UK

Elaine Mulcahy, Director UK Health Alliance on Climate Change

Ross Matthewman, Head of Policy and Campaigns, Chartered Institute of Environmental Health

Oliver Lord, UK Head of Campaigns, Clean Cities Campaign

Dave Timms, Head of Political Affairs, Friends of the Earth

Ruth Billingham, Head of Campaigns and Public Affairs, Living Streets

Imogen Martineau, UK Portfolio Manager, Clean Air Fund

Stephen Cooke, Head of Policy and Communications, British Safety Council

Silviya Barrett, Director of Policy and Research, Campaign for Better Transport

Larissa Lockwood, Director of Clean Air, Global Action Plan

Simon Birkett, Founder and Director of Clean Air in London

cc Rebecca Pow MP, Parliamentary Under Secretary of State in the Department for Environment, Food and Rural Affairs