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Clean Air Greater Manchester

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Chair of the Place and External Relations Scrutiny Panel

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Phone: 0161 342 2199 Ask for Paul Radcliffe Date: 26 June 2019

To whom it may concern,

Clean Air Conversation

I write on behalf of Tameside Council's Place and External Relations Scrutiny Panel. The Panel has remained suitably informed of the mandate to improve air quality across Greater Manchester, the development of an Outline Business Case and the Clean Air Conversation that is now taking place to inform proposals prior to public consultation.

The Scrutiny Panel seeks to submit a formal response to the Clean Air Conversation, which closes on 30 June 2019. This letter therefore aims to provide a summary of collective discussion points and to express any issues and concerns raised by panel members. I would be extremely grateful if on receiving this letter you are able to take the appropriate action to ensure the collective response is suitably recorded and submitted to the conversation.

Air quality exceedances identified across Greater Manchester's highway network have propelled the health related impacts of traffic pollution to the forefront of the local, regional and national agenda. Challenging decisions undoubtedly lie ahead with the introduction of a Clean Air Zone (CAZ). Panel members are fully supportive of the approach taken to tackle this head on as a region. We need to be bold and ambitious by reaching further than the mandate and for Greater Manchester to quickly reduce the number of deaths with poor air quality as a contributing factor.

Members are particularly aware of the relatively short timescales imposed when considering the need to raise general awareness and to support sustainable behaviour change. I have listed some of the main points below, which are to be viewed as individual responses from members, under the collective of Tameside's Place and External Relations Scrutiny Panel.

- The Panel is supportive of the proposed boundary of the CAZ and the need for this to become a concern for all boroughs, all businesses and all residents within Greater Manchester.
- The motorway network is a significant contributing factor to air quality exceedance in Tameside. With some of the poorest air quality identified in close proximity to motorway junctions. It appears difficult to evidence why the Government has made the decision not to mandate Highways England and the pressure this now places on local authorities to resolve issues outside of their direct influence or control.

- Consider the trunk roads and motorways that pass through Tameside, with current proposals to provide non-compliant vehicles with the leniency to drive through the borough, often as part of a longer journey, without being subject to a daily penalty.
- There are risks associated with the exemptions being granted to major trunk roads, with the potential for increased congestion and increased air quality exceedance.
- In order for Greater Manchester to support local business and deliver a truly effective CAZ, the Government must allocate the required funding levels and access to financial support.
- Identify the current level of non-compliant vehicles across the conurbation entering Phase 1 of the CAZ. Insight required to the purchase and lease methods of small and medium enterprise to prevent the CAZ imposing additional financial pressures resulting in businesses needing to relocate or downsize.
- Increase the level of direct engagement with businesses to ensure their views are
 effectively captured within the proposals and planned consultation. There is a significant
 need to increase responses from those impacted the most, as a percentage of total
 responses.
- Explore further options regarding the daily penalty charge for non-compliant vehicles entering the CAZ. A reduced daily penalty charge with phased increases. For example, daily penalty charges of £5 (Taxi / Private Hire) and £50 (Buses / HGV) to increase by 50% every 6 months up to Phase 2 and subject to review in 2023.
- As of June 2019 more than 80% of taxi and private hire vehicles in Tameside are non-compliant to meet the proposed CAZ emission standards. While technology and the demand for cleaner vehicles are growing, it is not expected to reach the majority of taxi and private hire vehicles by 2021. The consultation on Common Minimum Standard for Taxi and Private Hire Vehicles is welcomed, with a need to ensure consistent licensing measures are introduced across Greater Manchester.
- If national bus operators are able to access funding to upgrade or retrofit vehicles, there is a need to ensure all vehicles remain within the Greater Manchester network.
- Remain focused on improving the public transport network in Greater Manchester and impact of wider pollutants. To include accessibility; the need for 'one ticket' to incorporate travel across the bus, tram and train network; route planning and concessions. This is an essential part of allowing residents to make better transport choices in the long-term.
- That local authorities are further encouraged to work with key partners such as Hospital Trusts, Registered Social Landlords and Clinical Commissioning Groups to communicate the sectors commitment to improving air quality within organisational logistics and procurement. Options for more case studies of behaviour change within the wider media.
- Develop key messages to reassure the public that this not a money making exercise and that any additional funds (in excess of operating costs) will be re-invested in Greater Manchester.

If further clarity is needed on any of the above points, please do not hesitate to contact me.

Yours faithfully,

Councillor Mike Glover Chair – Place and External Relations Scrutiny Panel