



Manchester Friends of the Earth  
Green Fish Resource Centre  
46-50 Oldham Street Manchester

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3<sup>rd</sup> December 2020

Dear Clean Air GM,

### **Manchester Friends of the Earth response to the Greater Manchester Clean Zone Consultation**

We are writing in response to the Greater Manchester Clean Air Plan consultation. Thank you for the opportunity to comment on this important policy initiative. We need urgent and decisive action to significantly reduce air pollution in Greater Manchester and bring it within legal levels in the shortest time possible. An effective Clean Air Zone (CAZ) will lead to fewer, and cleaner cars on our roads, safer streets, more welcoming neighbourhoods and, vitally, healthier lungs for our children.

We support the introduction of a CAZ for Greater Manchester and urge you to implement this rapidly and to consider all options that increase the effectiveness of the CAZ to reduce air pollution in Greater Manchester in the *shortest time possible*. This means expanding the remit of the zone to apply restrictions to all vehicle types, including private cars, i.e. the creation of a **CAZ Category D**.

We support a Clean Air Zone in Greater Manchester because air pollution is a public health emergency that affects us all and places a particular burden on the most vulnerable in society. It is vital that Greater Manchester and other cities take action on air quality, and are supported and encouraged by the national Government.

In order to be effective, we need to see:

- CAZ charges set at levels that achieve real changes in the way people travel, i.e. acting as an incentive to walk or cycle, use clean vehicles, or public transport;
- a CAZ that is in operation seven days a week and 24 hours per day;
- the Government providing financial support to help those individuals and businesses who will need to change to cleaner vehicles;
- a clearly demonstrated commitment to continuing to develop walking and cycling infrastructure, affordable public transport, and infrastructure for charging electric vehicles.

### **The case for action on air quality**

- Research has demonstrated the severity of air pollution as a **health issue**. In 2018, IPPR North published research from King's College London that estimated *that '1.6 million life years will be lost in Greater Manchester in the coming century due to its poisonous air'*<sup>1</sup>. They calculated that this is equivalent to each of us having our life expectancy reduced by six months. Using the 2011 baseline, NO<sub>2</sub> pollution alone was estimated to have caused up to 1,781 premature deaths in Greater Manchester by 2018, and particulate matter pollution up to 1,906 premature deaths. The Royal College of Physicians and the Royal College of Paediatrics and Child Health has estimated that air pollution is causing 40,000 people to die prematurely each year. Adjusted for population, this is equivalent to approximately 2,000 people in Greater Manchester<sup>2</sup>.

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<sup>1</sup> <https://www.ippr.org/publications/atmosphere>

<sup>2</sup> <https://www.greatermanchester-ca.gov.uk/news/interim-gm-mayor-calls-for-action-to-prevent-thousands-of-premature-deaths-from-pollution/>

- Air pollution limits life expectancy, damages children’s development and has been linked with dementia. Emergency admissions to hospital for asthma in Central Manchester and North Manchester NHS trusts are double the national average<sup>3</sup>.
- Importantly, research suggests there is no safe level of air pollution, with impacts seen in areas within the legal limits. Recent British Heart Foundation research has demonstrated that people exposed to air pollution levels ‘well within UK guidelines’ have changes in the structure of the heart, similar to those seen in the early stages of heart failure<sup>4</sup>.
- It is a **social justice issue** as people in the most disadvantaged communities are least likely to own a car but often suffer the highest health and social impacts<sup>5</sup>.
- And it is an **economic issue**, estimated to cost between £1 and £1.2 billion across Greater Manchester - approximately a fifth of the region’s health and social care budget<sup>6</sup>.

### The case for a Clean Air Zone

With road transport contributing 75% of emissions of nitrogen oxides and 81% of particulate emissions in Greater Manchester<sup>7</sup>, any successful action on air quality will need to address travel and bring about reductions in vehicle use and a move towards the use of cleaner vehicles.

Friends of the Earth, nationally, and many other organisations, including the British Lung Foundation, are calling for effective Clean Air Zones in our polluted towns and cities.

Government research has shown that Clean Air Zones are the most effective route to compliance<sup>8</sup>. The Government’s own evidence shows that Clean Air Zones (CAZs), or networks of CAZs, that require polluting vehicles to pay a charge are the most effective measure to bring down levels of air pollution. ‘CAZs that include charging are the measure that can be modelled nationally (referred to as the ‘CAZ scenario’) to **provide the benchmark for achieving statutory NO2 limit values in towns and cities in the shortest possible time.**<sup>9</sup>.

### The case for going further: a Clean Air Zone Category D

Whilst we welcome the plans for a CAZ in Greater Manchester, we do not accept that the current plans will bring air pollution within legal limits rapidly enough. They therefore not only breach national guidelines, but also subject the population to severe health implications for longer than necessary. We urge you to go further and to implement a CAZ D, i.e. one that includes restrictions on private cars. According to the CAZ guidance<sup>10</sup>, a CAZ D will restrict the use of private cars below Euro 6 diesel and Euro 4 petrol. Such a scheme should be responsive as newer standards for car engines are established.

The principle of charging for private car use is not without political precedent. Manchester City Council Councillors unanimously passed a resolution in January 2020 to ‘Explore the feasibility of an ultra-low

<sup>3</sup> <https://www.manchestereveningnews.co.uk/news/greater-manchester-news/greater-manchesters-deadly-air-pollution-14781713>

<sup>4</sup> <https://www.bhf.org.uk/what-we-do/news-from-the-bhf/news-archive/2018/august/air-pollution-linked-to-heart-remodelling>

<sup>5</sup> ‘areas with households least able to access a vehicle also have the highest pollution concentrations, and conversely those areas with the highest household vehicle access have the lowest concentrations’ (Barnes et al, 2019)

Barnes, J. H., Chatterton, T. J., & Longhurst, J. W. (2019). Emissions vs exposure: Increasing injustice from road traffic-related air pollution in the United Kingdom. *Transportation Research Part D: Transport and Environment*, 73, 56-66. <https://doi.org/10.1016/j.trd.2019.05.012>

<sup>6</sup> <https://www.ippr.org/publications/atmosphere>

<sup>7</sup> In Greater Manchester road transport contributes 75% of emissions of nitrogen oxides and 81% of particulates. It also accounts for 32% of carbon dioxide emissions. The proportions of emissions from all sources are shown in Figure 2. <http://democracy.stockport.gov.uk/mgConvert2PDF.aspx?ID=91485>

<sup>8</sup> UK Plan for tackling roadside nitrogen dioxide concentrations. Technical report. July 2017

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/632916/air-quality-plan-technical-report.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/632916/air-quality-plan-technical-report.pdf) Effectiveness was assessed against three critical success factors: air quality impact, timing to impact and deliverability.

<sup>9</sup> [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/632916/air-quality-plan-technical-report.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/632916/air-quality-plan-technical-report.pdf) [Page 30] (Emphasis added)

<sup>10</sup> [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/863730/clean-air-zone-framework-feb2020.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/863730/clean-air-zone-framework-feb2020.pdf)

emission zone inside the Manchester/Salford Inner Ring Road<sup>11</sup>, therefore establishing the principles of charging owners of private vehicles to drive in Manchester City Centre. Like a CAZ D, an ultra-low emission zone entails charging people driving private cars. The draft City Centre Transport Strategy to 2040 mentions undertaking work to establish the feasibility of such a zone in the city centre as part of a commitment to pushing for cleaner, lower polluting vehicles as part of the delivery of the clean air plan<sup>12</sup>. This builds upon Greater Manchester commitment to air quality, demonstrated for example through the City Region signing up to the World Health Organisation (WHO) Breathe Life standards<sup>13</sup>.

In 2018, the High Court ruled that air pollution in the UK be reduced to below legal limits within the *shortest time possible*. Under the proposed plan for Greater Manchester, it is expected that legal compliance will be reached by 2024 - so a child born in 2018 will be seven before they can breathe 'legally safe' air. Even if pollution is brought within legal limits, we have established that these are not the same as safe health limits and research has shown that air pollution - particularly ultrafine particulates - causes lifelong damage to children<sup>14</sup>. Research has shown that the design of low emissions zones determines their effectiveness, determined by factors that include territory covered, level of stringency, enforcement of policies, exemptions granted to users, and the clarity of the policy<sup>15</sup>.

With private cars making up the majority of traffic in Greater Manchester<sup>16</sup> and therefore the majority of emissions, it is vital that this vehicle type is included in a CAZ if it is to be effective.

We understand that there are concerns about social justice and the implications of increasing the cost of driving for low-income communities and their ability to access transport in order to fully participate in society. These concerns must however be understood in the context of the current situation in which the most deprived communities are less likely to own cars yet more likely to live in areas with dangerous air pollution.

The requirement to buy a car in order to reach work or education can place stress on household budgets and leave less money for food, heating and social life. A truly inclusive transport strategy focuses on reducing the exposure of vulnerable populations to dangerous air pollution and improving access to employment, nature and key services by providing opportunities to live without a car by developing a comprehensive and affordable public transport network, creating safe routes for walking and cycling, and reducing the need to travel by enhancing and retaining shops and services in district centres. Financial support will need to be made available to individuals and businesses to help with the transition to cleaner vehicles, affordable public transport and active travel. A vehicle scrappage scheme will be most effective if it offers support not only for clean fuel and alternative cars and vans but also for modal shift, in the form of mobility credits that can be used in, for example, car clubs, bike hire and public transport season tickets. European research has emphasised the importance of proactive approaches to ensuring a fair transition, including providing incentives for other forms of mobility; helping small businesses, sole traders, and charities to go zero emission; and helping poorer families to purchase cleaner cars and use public transport, and walk and cycle for shorter journeys.<sup>17</sup>

An effective Clean Air Zone will lead to fewer, and cleaner cars on our roads, safer streets, more welcoming neighbourhoods and, vitally, healthier lungs for our children. We urge you to ensure that Greater Manchester rises to the challenge of protecting its most vulnerable residents by substantially reducing air pollution even if this entails some difficult political decisions.

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<sup>11</sup> <https://democracy.manchester.gov.uk/mgAi.aspx?ID=4294>

<sup>12</sup> Draft City Centre Transport Strategy (p15) [https://www.manchester.gov.uk/downloads/download/7277/draft\\_city\\_centre\\_transport\\_strategy\\_2020](https://www.manchester.gov.uk/downloads/download/7277/draft_city_centre_transport_strategy_2020)

<sup>13</sup> <https://breathelife2030.org/breathelifecity/greater-manchester/>

<sup>14</sup> <https://www.euro.who.int/en/media-centre/sections/press-releases/2013/01/newly-found-health-effects-of-air-pollution-call-for-stronger-european-union-air-policies>

<sup>15</sup> Transport and Environment, (2019), "Low-Emission Zones are a success but they must now move to zero-emission mobility", [https://www.transportenvironment.org/sites/te/files/publications/2019\\_09\\_Briefing\\_LEZ-ZEZ\\_final.pdf](https://www.transportenvironment.org/sites/te/files/publications/2019_09_Briefing_LEZ-ZEZ_final.pdf)

<sup>16</sup> 3.6.2 Private cars typically represents >70% of the vehicle movements on most roads, and so the influence of cars is significant in most areas where high pollutant concentrations have been identified. Furthermore, the large proportion of cars also influences areas of congestion due to the road space taken up by the vehicles. <http://democracy.stockport.gov.uk/mgConvert2PDF.aspx?ID=91485>

<sup>17</sup> Transport and Environment, (2019), "Low-Emission Zones are a success but they must now move to zero-emission mobility", [https://www.transportenvironment.org/sites/te/files/publications/2019\\_09\\_Briefing\\_LEZ-ZEZ\\_final.pdf](https://www.transportenvironment.org/sites/te/files/publications/2019_09_Briefing_LEZ-ZEZ_final.pdf)

Yours faithfully

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