

Environment Bill Public Bill Committee
House of Commons
Westminster
London
SW1A 0AA

16 March 2020

Dear Committee Chairs,

I am writing to you in my capacity as Greater Manchester Green City Region Lead to set out Greater Manchester's position on the Environment Bill.

As you know, the Environment Bill will have a significant impact on a number of functions of public authorities so I am keen to ensure the views of Greater Manchester are considered as the Bill continues its passage through parliament. Greater Manchester authorities welcome the reintroduction of the Environment Bill and the renewed focus it has brought to critical issues such as the climate emergency, air quality and flood protection.

Greater Manchester has developed a Five Year Environment Plan to address several major environmental challenges that threaten the future health and prosperity of our city-region. This plan sets out our aim to be a carbon neutral city by 2038 – a science based target, aligned with international commitments – and what we all need to do now and over the next five years to put us on that pathway. But we cannot do it all in Greater Manchester. Government has some of the most powerful levers, both fiscal and legislative, to drive the transformational change we need. It is vital that the Bill recognises that a systemic approach is required to reduce our carbon emissions, one that acknowledges the importance of considering the embedded carbon in goods and materials as much as the potential for our natural environment to sequester carbon.

While the Environment Bill presents a number of opportunities to tackle these environmental challenges, appropriate resources must be available to allow combined and local authorities to take effective and joined-up action. New responsibilities for local and combined authorities - to consult local people as part of new policies; to develop new strategies/plans; and to take on new roles – will each require significant additional support and capacity, for which additional funding will be vital if the Bill is to contribute to the achievement of the Government's environmental ambitions.

There are a number of core areas of the Bill that we believe warrant focused attention during the Bill's scrutiny in Committee. These are set out below:

Air quality

We welcome Government's intention to set ambitious, legally binding targets to reduce fine particulate matter, PM2.5, which in 2017 alone was responsible for 3,799 deaths in London and 923 deaths in Manchester. It is vital that these targets are health-based and aligned to World Health Organisation (WHO) 2030 guidelines, which is not currently explicit in the Bill.

The Government needs to engage with local and combined authorities on their role in meeting this target and its integration with Clean Air Plans, which are already being developed in

Greater Manchester and many other city regions. The immediate priority for Government, however, must be to provide Greater Manchester with details of the essential funding support that will be made available to businesses to help them to upgrade to compliant vehicles ahead of the introduction of the city-region's clean air zone.

Waste

We have concerns regarding the cost and environmental implications of proposed changes to domestic waste collections included in the Bill. As currently drafted, the Bill would require weekly food waste collections which could have cost, air quality and environmental implications in Greater Manchester and other areas where fortnightly collections are currently successfully carried out. Increased collections would increase vehicle movements (running counter to our clean air aims) and offer no practical or environmental benefit. As such, we believe decisions on collection frequencies should be left to the discretion of local authorities.

The Government's decision to ban or restrict the export of plastic waste to non-OECD countries is a welcome step to avoid the 'offshoring' of environmental responsibilities to countries who may not be adequately equipped to process this waste. However, the financial restrictions faced by many of our local authorities over the past decade have left us in a position where we are operating at capacity for waste management. We would therefore welcome clarity on measures that will be implemented (including potential funding provision) to allow local authorities to cope with this additional burden.

Office for Environmental Protection (OEP)

The Bill does not currently allow for public authorities to submit complaints of breach of environmental law by other bodies carrying out a public function to the Office for Environmental Protection (OEP). This would limit Greater Manchester's ability to ensure that the highest environmental standards are upheld across the city region. We would therefore welcome a change to allow public authorities to also utilise the OEP when other complaints procedures are exhausted.

We would welcome the Bill to put an explicit requirement on the OEP to:

- Ensure the accessibility of accurate, local and real time data;
- Support the development and maintenance of cohesive, cross sectoral local partnerships to drive environmental improvement; and
- Ensure infrastructure planning and investment is cross functional and not delivered in silos.

Local Funding and Resource Issues

The potential for local government to take greater responsibility in tackling our environmental challenges is welcomed. As outlined above, we are concerned however that the Bill does not guarantee appropriate funding and resources to provide local authorities with the full capacity needed to ensure these new responsibilities are met.

Specific areas of concern relate to the additional requirements on local authorities resulting from new measures including: mandatory 10% biodiversity net gain for new developments; provision of local nature recovery strategies; new waste collection requirements and capacity to support local partnership arrangements and wider, cross-sectoral collaborations.

Greater Manchester is supportive of the principles and ambitions set out in the Environment Bill but believes the Bill needs to be strengthened and improved in some areas. I hope the

Committee will consider the points outlined above as the Bill proceeds to Public Bill Committee. We would be happy to provide Committee members with further information on any of these issues.

Yours sincerely,



Councillor Andrew Western
Greater Manchester Green City Lead and Leader of Trafford Council