

Clean Air Feasibility Study – Communications Strategy

Introduction

- As set out in the Council’s policy document, Capital Ambition, the Council is committed to improving air quality in the city.
- The Welsh Government, along with the UK Government, has been legally challenged by an Environmental Law organisation, ClientEarth, on their plans to meet the EU [Ambient Air Quality Directive 2008/50/EC](#) in order to meet the EU limit value for Nitrogen Dioxide (NO²)
- NO² is damaging to the human health as this gas irritates the airways of the lungs, increasing symptoms of those suffering from lung diseases. Short term exposure to NO² is associated with increased risk of cardiovascular and respiratory diseases and there is no known safe levels of air pollution. Road traffic is responsible for around 80% of NO² measured at the roadside.
- Extensive baseline assessments have taken place in areas across the city by world renowned consultants, Ricardo AEA, to assess whether Cardiff will be compliant with EU Directive by 2021. The modelling suggests that Castle Street will be the only street in the city centre which is forecasted to show NO² levels exceeding the limit value beyond 2021, if no additional measures are implemented.
- The Welsh Government has placed a legal duty on Cardiff Council to identify and implement measures to reduce the NO² levels on Castle Street in the ‘shortest time possible’.
- In order to develop a preferred option, an Outline Business Case is required to assess the impact of a number of measure to reduce NO² concentrations. These measures will be benchmarked against a Clean Air Zone to assess which solution reduces the NO² concentrations in the ‘shortest time possible’. The benchmarking against a clean air zone is a requirement of the study which has been set by the Welsh Government.
- From a long list of measures that were analysed, a proposed list of measures has been modelled to achieve compliance in the quickest time possible.
 - i. Implementation of electric buses to replace the oldest and most polluting vehicles
 - ii. Retrofitted the remaining buses that do not meet the latest Euro 6 engine emission standards. (This could be further supported by creating a bus low emission zone around Castle Street/Westgate Street, by applying for a Traffic Regulation Condition requiring all buses operating in this area to be a minimum Euro 6/ULEV/EV. This further measure will need to be considered as part of the Final Business Case)
 - iii. Major changes to both Castle Street and Westgate Street to increase the provision for travel by bus and cycling.
 - iv. Review and implement a revised taxi policy to ensure that all applications for grant for a **new vehicle license** or for the **change of a vehicle on a current licence** are only approved for vehicles that meet the latest Euro 6 emission standards.
 - v. Improvements to Active Travel and cycling.

- These measures will be communicated to the public as proposals. The individual schemes will be consulted on prior to implementation in line with the statutory legal processes required.
- As part of a wider Clean Air Strategy, a series of additional measures have been developed, which will aim to reduce NO² levels further across all Cardiff.
- A limited number of scenarios are being modelled for a clean air zone which will be used as the benchmark in the assessment to assess when compliance can be achieved. **Guidance issued by the UK Government Joint Air Quality Unit (JAQU) clearly states that charging clean air zones should only be implemented if the non-charging alternatives are found to be insufficient to bring compliance in the shortest time possible.**
- A communications strategy and plan will be delivered to give clear information on the business case, with information on what measures are being proposed and the timeline going forwards before a decision is made.
- The information that is being given to the public is pre statutory engagement. The Business Case that has been put together is based on advice from specialist consultants. Any feedback that is given during the engagement process will be passed through to the Project Team and will be considered as part of the Final Business Case.
- Further communications will need to take place when the results of the final business case are known, so that all stakeholders identified are aware of the measures that will be put in place to ensure air quality compliance by 2021.

National perspective

- The Welsh Government has set out its final supplementary plan to tackling roadside nitrogen dioxide concentrations in Wales, in November 2018.
- The UK currently meets EU Limit values for most of the listed pollutants, the only statutory limit that Wales and the rest of the UK is currently failing to meet is NO² concentrations.
- Under the requirements of the EU Directive Wales is split into two zones (North Wales and South Wales) and two agglomerations (Cardiff Urban area and Swansea Urban area) and the Welsh Government is ultimately responsible to ensure that the level of NO² in any zone or agglomeration does not exceed the limits that are set out in both the EU and Welsh legislation.
- Where the level of NO² exceeds the limits set, the Welsh Government is required to draw up and implement an air quality plan to meet the standards in the shortest possible time. The limits are an hourly limit value of an average of 200 micrograms per cubic metre and an annual limit value of an average of 40 micrograms per cubic metre.

Aims and Objectives

Aims

To produce a communications strategy and plan to give information to the public and stakeholders on the options that are being considered in the Outline Business Case (OBC)

Objectives

- To advise the public and stakeholders on the process that has to be followed with the OBC to meet the requirements of the Welsh Government.

- To provide information on the measures that are being proposed in the OBC, what these measures are and how these measures will be benchmarked against a variety of possible Clean Air Zones in terms of the timescales for achieving compliance
- To give the public and stakeholders the opportunity to ask any questions through the engagement process and receive responses from the project team.

Situational analysis – key messages through SWOT (Strengths, Weaknesses, Opportunity and Threats)

Strengths

- There is no doubt that reducing road traffic and congestion in the city centre will improve the quality of the air that we all breathe and improve human health
- There has been positive feedback from the recent Green Paper – ‘Changing how we move around our growing city’ on the need to improve provision for active travel and public transport and improve the quality of air that we all breathe.
- With air quality improving and less congestion on the roads, it will be more appealing for people to walk or cycle, which in turn can support local economies by increasing footfall, improving accessibility and attracting new business and events;
- Cardiff is a small city and the population is predicted to grow significantly over the coming years. The Council has set out the need to move towards a 50/50 modal shift between those travelling by private car and alternative forms of transport. The excessive levels of NO² above the limits set in legislation gives context to why the Council has to put in measures in place to reduce traffic emissions and invest in active travel.
- Welsh Government has set out that £20 million of funding is available from a Clean Air Fund, and that initially this fund will be made available for Cardiff (and Caerphilly) to put measures in place to reduce NO² to the levels that are required in law.
- In accordance to Welsh Government’s draft CAZ Framework, revenue generated from any potential Clean Air Zone or Congestion Charge Zone should be reinvested to support local transport policies, to improve active travel, park & ride facilities and public transport infrastructure in the future.
- If 20 MPH limits are extended across the city, this will make these areas a safer environment for residents, cyclists and walkers, moving further towards the aim of having a 50/50 modal shift between those travelling by private car and sustainable transport by 2026.
- Potential funding could be made available for Cardiff Bus to move towards electric buses for their fleet and/or for retrofitting older buses so they meet latest emissions standards. Further collaboration with other bus operators, such as New Adventure Travel and stagecoach will be required to encourage these companies to update their fleet of buses.
- Incentive schemes could be made available for taxis to move towards hybrid vehicles or electric vehicles to reduce traffic emissions from these vehicles.

Weaknesses

- Excessive levels of pollutants are invisible and recent data from the Ask Cardiff survey suggests that public perception believes that polluted air isn’t a problem in Cardiff. It will be a difficult task to persuade some residents that action needs to be taken.
- There isn’t a clear Welsh Government framework for a Clean Air Zone. Any charging scheme would be unpopular with the public.

- At this stage of the process the communications will focus on the process of the OBC, with measures that can be put in place to reduce the NO² emissions to permitted levels. These measures haven't yet received funding, so the information is being released into the public domain before we know whether the schemes are deliverable.
- Any measure which involves improvements to the highway will involve an element of disruption to the public and businesses.
- The monitoring that has taken place is to assess air quality against national standards/legislation. This is separate to the Air Quality Management Areas (AQMA's) which are in place in the city.
- Due to a number of uncertainties in the modelling work, concerns could be raised on the accuracy of the forecasted results, which could in turn cause concerns on the how effective the proposed solutions will be.

Opportunities

- The £20 million of funding for Cardiff and Caerphilly will allow the authority to develop credible costed measures to reduce NO² from the polluted areas in the city.
- For a significant period of time, Government Policy has set out the need to reduce CO² emissions to reduce the impact on the environment. During that time, diesel engines were the preferred option. Electric vehicles are now becoming a credible option and with Government Policy now moving towards this as their preferred solution (Potential ban on ICE cars by 2040) scrappage schemes (National scheme scrappage scheme) may become available for more polluting vehicles to encourage behaviour change for the need to buy new cars or travel credits.
- With less vehicles on the road and less congestion, the urban environment of Cardiff will improve, which will give opportunity for people to 'reclaim their streets'. The recent car free day which took place in the city centre demonstrated what is possible.
- The delivery of the METRO will significantly improve public transport in the city, which in turn will displace travel by car. This will improve the air quality in the city centre even further.

Threats

- Please refer to the Project Team's Risk Register.

Target Audience

High influence/High interest

- Statutory bodies, WLGA, NRW, Public Health Wales, Public Health Board
- Policy officers at Welsh Government who oversee the funding
- Cabinet
- Elected Members
- Public Services Board
- Clean Air Steering Group
- Shared Regulatory Service Joint Committee
- Public Protection Committee
- Environmental Scrutiny Committee
- MP's and AM's representing Cardiff
- MP's and AM's representing areas in the City Region
- Local communities living in close proximity to where the measures will be put in place

- Established community groups in close proximity to where the measures will be put in place
- Businesses in close proximity to where the measures will be put in place
- Environmental campaign groups – Friends of the Earth, ClientEarth, Healthy Air Cymru
- British Lung Foundation Wales
- British Heart Foundation Wales
- Business Improvement District – For Cardiff (on behalf of city centre businesses)
- Unions – GMB, UNISON and UNITE
- Sustrans
- Cardiff Cycling Campaign
- Living Streets

High influence/low interest

- Local and national media

Low influence/High interest

- Taxis – Private hire operators and Hackney carriage
- Royal Mail
- Bus companies operating in Cardiff - Cardiff Bus; Stagecoach and New Adventure Travel
- Coach companies - National Express
- Associated British Ports
- Federation of Small Businesses Wales
- Alliance of British Drivers
- Road Haulage Association
- Society of Motor Manufacturers and Traders
- Community Transport Association
- Chartered Institute of Environmental Health
- Institute of Air Quality Management
- Environmental Protection UK
- Environmental Industries Commission
- Confederation of Passenger Transport
- Travel campaign groups – RAC, AA, Alliance for British Drivers

Low influence/low interest

- The wider public in Wales

Communication methods

External

Creation of a Concept/Brand and Logo

The creation of an identity for the project is essential. As well as using the brand on all communications material during the OBC and FBC, and it can also be used for on-street signage/information boards when the construction work takes place on the various projects.

Input	Creation of a concept, brand, logo and identity for the project.
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Output	Linking the identity of the scheme to the 5 projects which need to be delivered to lower the NO ² levels in Castle Street and the surrounding areas.
Impact	Better public understanding on the need for these projects, to improve air quality in the city centre which in turn will benefit the public's health.

Creation of a stakeholder database

There are a significant number of interested parties identified through the stakeholder mapping. A database will have to be produced, so that the Project Team can easily contact these groups through various communications material.

Input	Researching the key contact in each organisation identified through the stakeholder mapping, with email and telephone contact details.
Output	Having all the contact details, so the Project Team is able to mail merge the stakeholder newsletter to all stakeholders identified for the scheme.
Impact	Ensuring that all stakeholders receive timely and accurate information on the project, directly for the Project Team.

Council website – www.cardiff.gov.uk

Rather than have a standalone website, the idea is to incorporate all relevant information on the project on the Council's website. This will include up to date information on the context to the problem; the project objectives, Q& A documents, infographics and contact details so that the public can make enquiries about the project.

Input	Creation of a dedicated web page to give up to date information on the project.
Output	Ensuring the public have a single source of truth on all information related to the project
Impact	Monitoring web analysis on the number of web hits, visits and other related data.

Dedicated email account for the public to ask questions and receive responses

A dedicated email account will be set up which will be managed by the Project Team. This will give the public an opportunity to ask any questions they may have through the engagement process. All correspondence will be saved and archived for future reference.

Input	Giving the public and all identified stakeholders the opportunity to email the Project Team with any questions they may have on the project.
Output	Responding to any enquiries with accurate information on the project.
Impact	Number of emails received and number of responses given within the agreed timeline.

Proactive media engagement

The media will be fully briefed on the campaign before the matter is discussed at Cabinet. The business case and the parameters on what has to be analysed will be clearly explained, so that it is understood that a Clean Air Zone has to be evaluated as part of the process.

A press pack will be produced which will include a media press release, a questions and answers documents as well as media interviews with the relevant Cabinet members being made available. All information will then be published on the Cardiff Newsroom website.

Further media releases will be issued to publicise the public drop in sessions which will take place, as well as any updates that are available during the business case.

When the preferred option is identified, a further media briefing will take place, so that any questions on the business case can be answered prior to the information being released into the public domain.

Input	Ensuring that the media receive detailed information on the project under embargo before information is published in the public domain.
Output	Giving the opportunity to the media to fully understand the project and ask any questions they may have prior to articles being published
Impact	Number of media briefings given; number of press releases issued and number of press enquiries responded to.

Social media

The use of the Council's social media channels will be used to give updates on the project as it progresses. It is essential that the public understand the need for change, and these channels will be used to create debate and answer any questions that arise from the public.

Input	Ensuring that information on the project is cascaded down through the Council's established social media channels.
Output	Ensuring that all our followers receive information on the project. A campaign group will be set up for the project, so that all social media activity to can be recorded.
Impact	Regular statistics on the success of the social media activity will be able to be downloaded from the social media software – Orlo.

Public drop in sessions (roadshows)

A series of public drop in sessions will be provided with an exhibition on the project. Members of the Project Team will be in attendance to answer any technical questions on the public. It has to be made clear in all of the exhibition material that this project is in place to deal with excess NO² emissions related to national legislation. This is separate to the Air Quality Management Areas, which are in place through breaches to local legislation.

Input	Ensuring that residents and businesses which will be directly impacted by the proposed schemes receive information on the project and are able to have questions answered directly from the Project Team.
Output	Providing detailed information on the project directly to the people that will be affected by the development of these schemes, so they understand the need for the projects.
Impact	Monitoring will take place through feedback forms which will be provided to the public after they visited the exhibition and asked any questions that they may have. Members of the public will also be able to add their contact details to the database so that they can receive further information as the project develops.

Stakeholder newsletter

A stakeholder newsletter will be produced which will be sent to all identified stakeholders on the database to give information on the project.

Input	Ensuring that all identified stakeholders that have been identified receive a monthly newsletter from when the OBC is submitted to when the FBC is approved by the Welsh Government.
Output	Providing information on the project to all stakeholders.
Impact	Number of stakeholder newsletters sent to stakeholders.

Business Improvement District Meetings

The BID – For Cardiff – represent businesses in the city centre and regardless of whether the ‘measures’ are chosen as the preferred solution, or the Clean Air Zone, city centre businesses will be impacted and there will be significant interest in the project. Established meetings are set up with the BID, and the communications plan will look to utilise these existing measures.

Input	Regular updates to the BID team, so information can be cascaded down to their members.
Output	Ensuring that city centre businesses understand the reason why these schemes need to be put in place.
Impact	Number of briefing sessions held, feedback received from city centre businesses.

Partner’s websites (Sustrans, Living Streets, Cardiff Cycling Campaign)

Working with our partners, we will share content on the project, so that information can be published through partners’ websites. Although the Project will not have editorial control over these websites, direct links will be given to the council’s website and Cardiff newsroom to increase the reach

Input	Proactively sending information and web links to partners so information can be put up on their website.
Output	Developing a wider audience to give information on the project.
Impact	N/A

Cardiff Council Taxi Forum

This is an established forum which is led by Cardiff Council’s Licensing Department. This new approach will affect the taxi trade, as it is proposed that taxi licensing policy relating to polluted cars will be amended and incentives may be available for taxi drivers to move towards electric or hybrid vehicles.

Input	Proactively engaging with the taxi trade so they understand the reasons for the proposed change in policy.
Output	Increased understanding in the taxi trade on the reasons and requirements to deliver the project.
Impact	Number of taxi drivers in attendance at the Taxi Forum.

Internal

Briefing for the C2C and social media team

The C2C Management Team will be fully briefed on the project. The number of calls from the public is expected to be relatively low, due to a dedicated email account being put in place, as well as interactions via social media.

Input	Ensuring that the internal staff who manage the Contact Centre fully understand the project and the reasons why it has to take place and are able to cascade information down to their frontline staff. A briefing pack will be provided to the C2C management team to ensure that any calls that are received can be answered correctly.
Output	Ensuring that C2C staff are able to give accurate information to anyone who enquires about the project
Impact	Number of calls received/number of responses issued

Cabinet

Cabinet are the decision makers on this project and they will agree the measures that will be analysed against the Clean Air Zone as part of the Outline Business Case. Cabinet will be kept fully informed of developments by the Project Team.

Input	Ensure all Cabinet Members fully understand the project and the process relating to both the OBC and the FBC.
Output	Cabinet Members are informed so that they are in a position to approve the measures that are set out in the OBC.
Impact	Whether the Outline Business Case is given the go-ahead by Cabinet.

Public Protection Committee

The Public Protection Committee is the decision making body on taxi licensing policy. Any changes to the existing policy, which have been earmarked in the measures proposed for this scheme will have to be approved by the Committee.

Input	Members of the Committee will be fully briefed on the project and the need to change taxi licensing policy to reduce NO ₂ levels in the city centre
Output	Improved understanding of the committee on the need to make changes to taxi licensing policy in line with the context of the project.
Impact	Whether the Committee approve the measures that are being proposed

Meetings with Welsh Government

This engagement will be led by the Project Team, to ensure there is agreement on the measures that are being proposed in the Outline Business Case.

Input	Regular updates by the Project Team to the Clean Air Board which has been commissioned by the Welsh Government to oversee the progress of the Outline Business Case.
Output	Ensuring that the Clean Air Board understand the proposals that are being put forward to reduce NO ₂ emissions in Castle Street.

Impact	Ensuring that members of the Clean Air Board are happy with the content of the OBC before it is officially submitted to the Welsh Government.
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Public Services Board

Regular updates will be given by the Project Team to the Public Services Board so there is agreement on the measures that are being proposed as part of the Outline Business Case.

Input	Regular updates to the Public Services Board to ensure they are fully informed of the project, as it develops.
Output	Members of the Public Services Board having Internal buy-in to the project as it develops.
Impact	Ensuring that all members of the board agree with the measures that are being put forward as part of the OBC.

Clean Air Steering Group

The Clean Air Steering Group is the decision making panel on the business case, before the project is proposed and debated by Cabinet. Regular meetings are set between officers and Elected Members. This project crosses over into a number of Cabinet Members' portfolios including Strategic Planning and Transportation; Clean Streets, Environment and Recycling and Social Care, Health and Wellbeing

Input	N/A – as this is the steering group, this groups leads the project going forwards.
Output	Ibid.
Impact	Ibid.

All member engagement

All members need to understand the reasons for the project, what measures are being put forward as part of the OBC and the impact that these measures will make compared to a Clean Air Zone. It is proposed that a presentation is scheduled at the beginning of each political group meeting. Questions will be answered by officers and then officers will leave before political discussion takes place.

Input	One presentation to each political group meeting before the OBC is submitted to the Welsh Government.
Output	Ensuring that all members understand the need for the project.
Impact	Whether there is political buy in across the political parties for the project.

Shared Regulatory Services Joint Committee

The Shared Regulatory Services is responsible for the Air Quality Management Areas in the City Centre; Llandaff; Stephenson Court and Ely Bridge. This is separate to the work of the project, but it is important that the Joint Committee are kept informed on the progress with the project, as the measures that are proposed to reduce NO² on Castle Street should in turn eradicate the AQMA in the city centre.

Input	Regular updates to the SRS Joint Committee to give information on the measures that are being proposed as part of the OBC.
Output	Sharing best practice on how to deal with air quality issues with the SRS partners of the Vale of Glamorgan and Bridgend.
Impact	Better understanding between the SRS elected members on how this project can improve the AQMA in the city centre.

Environmental Scrutiny Committee

The scrutiny committee will scrutinise the cabinet report on the proposed measures before cabinet make the decision on the proposed measures. The Environmental Scrutiny committee have already carried out a Task and Finish Exercise on this subject and a series of recommendations were drafted by the committee. This work was carried out before the detailed modelling was carried out by Ricardo.

Input	The Environmental Scrutiny Committee will scrutinise the OBC prior to the report going to Cabinet
Output	Giving members of the committee the opportunity to scrutinise the measures that are being put forward in the OBC and the forecasted impact of these measures prior to a decision being made at Cabinet.
Impact	Giving scrutiny members a better understanding of both the project and the measures that are being put in place following on from their previous Task & Finish Group on this subject.

Staff engagement

The established communication methods for staff will be utilised, which includes Core Brief, Intranet and the staff app.

Input	All press releases on the project will be shared with staff through the established channels
Output	Increased staff understanding on the project and the schemes that are being proposed.
Impact	Number of posts issued to staff on the project.