

**Welsh
Government
Consultation
Response
Form**

Appendix A

Clean Air Plan for Wales: Healthy Air, Healthy Wales

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Section Title	Questions
<p>The Clean Air Plan for Wales - Thematic Approach and Commitments</p>	<p>1. Does the thematic approach in the Clean Air Plan bring together the key air quality issues in a way that is clear and helpful way?</p> <p>Cardiff Council agrees with the outlined thematic approach, recognises and supports Welsh Government’s (WG) aspirations to deliver air quality improvements for the whole of Wales. The document cites various commitments and actions considered necessary to satisfy four given target themes that will cumulatively promote improved air quality. In order to aspire to achieve and satisfy the various themes the Council would urge Welsh Government to consider a singular key overriding objective, such as ‘achieving air quality levels as low as reasonably practicable for Wales’. It would prove useful if those commitments and actions are documented in an order of priority or viability, as well as clearly provide key performance indicators/ milestones for when those commitments/ actions will be met. The Council would also see it preferable if WG made clear who is responsible for the listed commitments/ actions.</p>
<p>Air pollution and health</p>	<p>2. Do you agree enhancing monitoring and assessment capabilities will help to understand and inform action to reduce the impacts of air pollution on health and well-being in Wales? Please provide evidence in support of your views where possible.</p> <p>3. Do the commitments and actions for health and well-being address the most important factors for improving air quality and realising health benefits?</p>

	<p>Cardiff Council welcomes the implementation of an enhanced monitoring network and improved new aligned approach to assessing areas of poor air quality, reverting to driving agendas from a public health perspective, and in doing so not becoming reliant upon air quality limit value thresholds and only pursuing compliance with said values. It is also encouraging to see the adoption of additional pollutants to be monitored in Wales, such as PM_{2.5} and inclusion of stringent air quality limit values, with reference made to WHO guidelines being appointed.</p> <p>However, the Council does have concerns on whether the adoption of WHO guidelines are realistically achievable given background levels in Cardiff already encroach on the WHO guideline value for PM_{2.5} of 10 µgm/3. The Council notes that Welsh Government intend to consult on the development of these new targets for particulate matter and the Council would therefore use this as an opportunity to address such concerns.</p> <p>As part of the recommendations and actions, although PM_{2.5} is cited, the Council would like to highlight that the proposed actions does not foresee the inclusion of further Ozone (O₃) or Ammonia (NH₃) monitoring. It is widely accepted that these pollutants pose threats to both public health and the natural environment, mainly through formulating secondary pollutants. It has also been noted increased metal levels are associated with vehicles under braking conditions. The Council would welcome any approach by WG to re-evaluate its strategy to strengthen the monitoring in Wales and provide a clear understanding how this will be achieved through appropriate allocation of resources to local authorities.</p>
<p>Local Air Quality Management (LAQM)</p>	<p>4. Are you satisfied the proposals for Local Air Quality Management will result in robust, effective air quality management arrangements?</p> <p>The Council welcomes the approach from WG to review LAQM to modernise the approach and adopt a public health-driven approach to enhance its outputs and outcomes and it is hoped that the outcomes of this review will ensure a more robust LAQM is delivered.</p> <p>As part of this review the Council would also welcome a review of whether one integrated air quality management regime in terms of the requirements under LAQM and the EU Ambient Air Quality Directive to enable these regimes to be better aligned.</p>

<p>Area-specific policies and the designation of air quality improvement areas/zones.</p>	<p>5. Are you satisfied with the proposed approach for Clean Air Zones/Low Emission Zones in Wales?</p> <p>Cardiff Council recognises that the implementation of Clean Air Zones/ Low Emission Zones can be successful measures to reduce air pollution levels. However, it is important to also recognise the wider societal impacts (i.e. impacts on deprived persons to upgrade vehicles, displacement effects etc.) that imposing such measures could have and that these wider considerations should be accounted in any revised framework.</p> <p>In reviewing any framework for CAZs, Welsh Government should consider any wider negative impacts that such zones, could have in terms of other emissions with particular reference to greenhouse gases/ CO2. The current framework allows for Euro 4 petrol vehicles which are known to have a higher CO2 emissions, and thus the impacts of CAZs as a tool addressing the climate emergency need to be considered in any revision of the framework.</p> <p>It is noted that where CAZs are being proposed by English local authorities, such as Bristol, Birmingham, Leeds, and Newcastle that such schemes are being supported with significant funding bids for vehicle scrappage schemes, bus retrofitting schemes, taxi grant schemes and further highway improvements. In progressing any revised CAZ framework Welsh Government should be minded to ensure similar levels of funding and resources are made available to support any such implementation.</p> <p>Further any future proposals for any form of charging/ vehicle access restrictions should ensure that a wide range of environmental issues including addressing climate change are also a requirement. The Framework should also look to include how such measures can work to achieve modal shift aspirations, thus the use of road user charging and other mechanisms should also be considered.</p> <p>The Council therefore welcomes the intention that in addition to reviewing their Clean Air Zone Framework, Welsh Government is committed to reviewing the role that road user charging could play in reducing roadside levels of air pollution. As detailed in our recent Transport White Paper, road user charging is just one charging mechanism the Council will look to assess as a delivery option for the transport vision. One of the key objectives of any such scheme would be to facilitate wider improvements in air quality. The Council is therefore encouraged and welcomes the fact that Welsh Government will review road user</p>

	charging and we would look to work with Welsh Government on any such proposals.
Domestic Combustion	<p>6. Do you agree with the proposals for tackling air pollution from domestic combustion?</p> <p>7. Which aspects of Smoke Control would you would like Welsh Government to consider or strengthen?</p> <p>Cardiff Council agrees that the enforcement of pollution from domestic combustion does need further scrutiny. The current procedures to enforce domestic burning is a very long process and requires much evidence before a statutory nuisance is sanctioned. The Council would request that WG therefore consider whether a more a streamlined and more enforceable legislation is considered. In support of this it would be necessary that the mechanisms that be made accessible to local authorities to deliver sufficient good practise. Welsh Government should work with the Welsh Air Quality Forum to establish a Task and Finish Group to look at reviewing how domestic combustion issues should be better regulated and enforced to inform any change in legislation.</p>
Integration of area specific policies	<p>8. Are you satisfied with proposals to deliver a more integrated air quality management approach? If no, please provide evidence to support other alternatives</p> <p>Cardiff Council favourably views the described integrated air quality management approach outlined in the Draft Plan. However, in order to facilitate the approach it must be acknowledged by Welsh Government that the responsibility to implement and solidify this revision in working practise should not be wholly the responsibility of local authority officers specialising in air quality. Welsh Government officials, must therefore take a lead role in developing this approach in collaboration with local authority officers. but there needs to be a steer from Welsh Government representatives.</p>
Indoor Air Pollution	<p>9. Are there aspects of indoor air pollution which you would like Welsh Government to address? You may wish to consider what the Welsh Government’s top priorities should be for regulating chemicals in articles and products which may contribute to poor indoor air quality.</p> <p>The Council supports the actions proposed by WG to review indoor air pollution and measures to raise awareness on this emerging issue and would welcome any further research into this area.</p>
A Clean Air Act for Wales	<p>10. Do you support the proposals for a Clean Air Act for Wales?</p> <p>11. Are there additional issues a Clean Air Act should address?</p>

	<p>12. What other legislative or regulatory actions in relation to air quality should we consider to improve people's lives and community well-being in a sustainable way?</p> <p>Cardiff Council welcomes the idea for a proposed Clean Air Act for Wales and would be content to participate in any pilot studies that would assist with the assessment needs to review the various proposed actions. Cardiff Council would encourage Welsh Government to establish a strong evidence base prior to finalising any documentation, specifically when it comes to instigating revised air quality objectives that would adopt WHO guidelines. It is welcomed that an action outlined in the Draft Plan is to develop and consult on new targets for particulate matter in Wales, and that this work will be informed by an expert panel to ensure the right approach is developed. It is widely accepted that Wales' current monitoring network does need to be strengthened and expanded upon. There is a definite need to implement monitoring sites at locations of relevant exposure with the capability of monitoring particulate matter.</p> <p>Given the urgent need to address both air quality issues and the climate emergency it would be welcomed if Welsh Government could consider including a Section within the Clean Air Act that provides local authorities powers to expedite implementation of planned interventions to address breaches of air quality standards / or to meet carbon reduction targets provided robust evidence is available to support such measures.</p> <p>Ideally the Council would welcome if such powers could ensure any implementation of any measures to address air quality or climate emergency issues had limited scope to being challenged.</p>
<p>Public awareness about airborne pollution</p>	<p>13. Citizen science projects to date have focused on work with young people. Are there other age groups or communities would you like to see us work with?</p> <p>14. Which age groups do you think would benefit most from greater understanding of air quality, pollutants, evidence and interpretation, and developing personal awareness and responsibility?</p> <p>15. Are there other approaches or opportunities to develop greater understanding of air quality issues that you think we should explore?</p> <p>16. Do the proposed communications work streams provide a suitable focus for air quality communications and behaviour change work?</p> <p>17. Are there features you would like as part of the Air Quality in Wales website?</p> <p>18. Are there specific communications and behaviour change campaigns you would support?</p>

- 19. Are there age groups or communities who could contribute to developing citizen science projects?**
- 20. Which age groups would benefit most from developing personal awareness, understanding and responsibility in terms of air quality and pollutants?**
- 21. Are there additional approaches or opportunities to develop greater understanding of air quality issues that should be explored?**

To date the Citizen Science approach does not include the use of holistic objectives. There are numerous groups/ organisations working towards their own objectives and performance indicators. Welsh Government need to assign objectives formulated through a collaborative working partnership established between LAs, Health Professionals, Academia and Local environment campaign groups. Cardiff Council does recognise schools which encapsulates the younger generation, as a useful tool to educate and generate behaviour change. Although it is good to examine those groups suggested as vulnerable to air quality, broadening the captive audience such as the inclusion of motorists would encourage and deliver greater positive impacts for air quality.

The Council is committed to achieving air quality levels as low as reasonably practicable, whereby educating all age groups aids in delivering this aspiration.

The Council frequently receives enquiries/ complaints regarding idling vehicles. Under the **Road Traffic (Vehicle Emissions) (Fixed Penalty) (Wales) Regulations 2003, regulation 6 (3)** Cardiff Council has the power to implement 'no vehicle idling' areas, particularly where groups congregate, such as outside schools, hospitals and care homes, and in areas where exposure to road-traffic related air pollution is high, i.e., in AQMAs.

However, Cardiff Council does not currently exercise these powers owing to a number of difficulties in the enforcement of them, particularly around the requirement of having to request drivers to switch off their engines prior to taking any further action.

It would therefore be welcomed if Welsh Government revisited the legislation surrounding vehicle idling and reevaluated its purpose and integrity. In order to strengthen the use of non-idling legislation the Welsh Government ought to examine how they can make the action more robust and make it clear how it can be enforced without difficulty. This could be further supported by the development of a National non-idling campaign for Wales.

<p>Improving air quality to protect the health and well-being of current and future generations - commitments and actions</p>	<p>22. Do the proposed commitments and actions address the issues described in the health and well-being section of the Plan?</p> <p>23. Do you agree the actions will help to reduce the impact of air pollution on health and well-being in Wales?</p> <p>24. What additional commitments or actions would you propose?</p> <p>Cardiff Council welcomes the proposed commitments and actions, however given the number of actions required and level of work needed to complete the actions, there is an underlining concern if the actions are achievable. Concerns associated with workload requirements and commitment expectant of LAs will put pressure on satisfying the targets dates for completion.</p>
<p>Improving air quality to support our natural environment, ecosystems and biodiversity</p>	<p>25. What sorts of nature based solutions could be promoted to help to reduce human exposure to air pollution?</p> <p>26. How can we speed up the recovery of our biodiversity and ecosystems alongside emission reduction?</p> <p>27. What activities can we emphasise in our environmental growth plan to help tackle air pollution and its impact on ecosystems in Wales?</p> <p>28. Do the proposed commitments and actions address the issues described in natural environment, ecosystems and biodiversity section of the Plan?</p> <p>29. Do you agree the actions will help to reduce the impact of air pollution on natural environment, ecosystems and biodiversity in Wales?</p> <p>30. What additional commitments or actions would you propose?</p> <p>In general the Council agrees with the approach set out in the 'Intelligent tree and hedge planting supporting air quality improvements' section of the consultation document and would offer the following further comments.</p> <p>Urban Green infrastructure (GI), when designed and implemented correctly can lead to improved air quality on a local scale. GI has the ability to control pollution dispersion and deposition, and therefore is a useful tool to be used in urban environments. As well as improved air quality conditions, urban green infrastructure also provides benefits such as less heat stress, management of storm waters and a reduction in energy consumption and noise pollution, and thus can enhance city aesthetics and public realms.</p> <p>With that said the Green Infrastructure is likely to be limited to improving levels of NO₂. A recent study produced for by</p>

the Air Quality Expert Group for Defra, which states the following

‘For nitrogen dioxide (NO₂), vegetation is, generally speaking, of little benefit; it is not a very efficient sink. The deposition occurs in daytime, and primarily in the warmer months, when NO₂ is less of a problem.

However the same study also suggest that evidence ‘suggests that planting more trees in an urban area will increase deposition rates of particulate matter’. There are also the wider health benefits from increasing urban planting that should be factored into any programme

Whilst it is accepted that individual trees can block air pollution in some situations (the TDAG document on air quality sets this out) and that trees/vegetation are not a complete solution to air quality at a city scale, the Clean Air Plan for Wales appears to suggest that only woodland planting can have any positive effects on air pollution and planting of individual trees is not a worthwhile option.

Overall the document is somewhat lacking in the green infrastructure approach, and there are other nature-based solutions which could be included in the Clean Air Plan. For example green walls create rough surfaces at different heights, which can increase air mixing and therefore pollutant dispersal, as well as providing greater surface area for deposition.

The use of varied heights and forms of trees within the urban landscape can increase air mixing and therefore pollutant dispersal, so a varied canopy cover should be an aim of any urban planting scheme.

Large healthy trees have the greatest effect at pollution removal and are more effective than smaller trees. A mixture of tree species is also important.

To maximise pollution control, retention of existing trees and new tree planting has to be considered from an early stage in the design / planning process, before the building layout has been fixed.

Too often trees are seen as an ‘afterthought’ and their potential impact isn’t realised.

Hedges have been invoked as barriers to dispersal, but planted containerised trellises or ‘green screens’ may also be effective where it is not possible to plant hedges or trees in the ground.

Any type of vegetation whether it be trees, hedges, screens or green walls etc. has the potential to introduce biodiversity into an otherwise potentially sterile environment. Any planting scheme should aim for a mixture of species, deciduous and evergreen, native and non-native, annual and perennial etc. in order to increase diversity. Semi-natural informal planting will normally be better for wildlife than formal planting of monocultures, and other measures such as use of flowering plants, unsealed soils, and fruiting species can all have additional benefits. Use of SuDS will provide opportunities to provide additional innovative landscape schemes that provide drainage, biodiversity and pollution benefits and an opportunity to provide a wider range of species.

Parks and public open spaces in urban areas can act as 'oases' of better air quality, so accessibility to these spaces should be prioritised in the urban landscape. Wherever possible provision of new green open space, particularly in densely built environments such as city centres should be a priority.

Smaller areas of green land can also provide opportunities to create additional planting, benefitting biodiversity by acting as a stepping stone for biodiversity connecting to other sites. In terms of pollution control these spaces are particularly important where levels of pollution are high e.g. on main traffic routes or junctions.

Ecosystem resilience should be assessed in terms of the attributes referred to in the Environment Act, being Diversity, Extent, Condition and Connectivity. Any green infrastructure intervention aimed at reducing impacts of poor air quality should strive to maximise all of these attributes.

The forthcoming Area Statements should be used to inform the Environmental Growth Plan, as should the second version of the State of Natural Resources Report (SoNaRR).

Green infrastructure interventions for air quality could be incorporated into SuDS, whereby for example intercepted particulates are washed down into the SuDS and natural filtration occurs through reed beds or similar vegetation, leading to bioaccumulation of contaminants.

In the sense that references to the WBFG Act and the Environment (Wales) Act incorporate the ecosystem approach and address the attributes of ecosystem resilience, then I would say yes.

	<p>The proposed actions will inevitably have some benefit in terms of reducing the impact of air pollution upon the natural environment. This is provided an ecosystem approach or green infrastructure approach is taken which comprehensively incorporates trees, soils, landscaping, parks, public open spaces, SuDS and biodiversity. These actions should also increase the benefits provided by green infrastructure in mitigating the impacts of poor air quality upon the human population.</p>
<p>Industrial Air Pollution</p>	<ol style="list-style-type: none"> 31. On which sectors, processes or areas should we focus our action to reduce public exposure to industrial emissions to air pollution? 32. Are there any specific legislative changes you think we should consider in order to tackle industrial emissions to air? 33. Are there any specific actions or measures with which we can encourage investment by industry to reduce air pollution? 34. Are there any specific actions or measures with which we can encourage investment by industry to reduce air pollution? 35. Do you think generators used for research and development should be treated differently in terms of emission controls? <p>Cardiff Council understands the public health concerns associated with industrial installations, both large and small scale. The Council believes that improvements can be made in respect to the planning and permitting process. Firstly, in line with the Environmental Permitting Regulations 2018 the WG need to provide clarity and simplify the expectancies and obligations of the EPR 2018. It needs to be documented and communicated clearly by WG what is expected of current and future installation operators, as well as underpin who is the responsible regulating body. In addition, in terms of installations that conform to the Medium Combustion Plant Directive (MCPD) or Part A of EPR 2018 in Wales, Natural Resources Wales (NRW) ought to become a direct consultee for local authorities during the planning process, therefore addressing any potential concerns/ queries. Planning and permitting must be addressed at the same time. This approach will avoid installations being granted planning consent without the ability to be approved a permit to operate. Also in moving forward to account with future growth and development and ensure a sustainable long term approach which protects our future and well-being, NRW can provide valuable input to a suggested cross national supplementary planning guidance for Wales which would integrate the needs of the various industrial emissions air quality legislation, as well as aid local authority to deliver</p>

	<p>development in the best possible way, in line with their LDP objectives and policies.</p> <p>NRW can review its own approach to risk assessing the impacts derived by source point installations. NRW could give consideration to the adoption of Defra’s Damage Cost Approach Guidance, which provides a monetary value for air quality impacts generated by the proposed development. The applicant will then need to provide a list of mitigation measures that equate to the monetary value calculated. This would be a valued commodity for local authority. The review could also see the aspirations of the LDP’s considered as part of the permitting process.</p> <p>From a local air quality management perspective, new industrial proposals are examined in terms of their process contribution. There are instances whereby the baseline concentration already exceeds the critical level. However, process contribution is less than permitted % of the critical level. What is the viewpoint to authorise such a development given this scenario?</p>
<p>Improving air quality to support a prosperous Wales - commitments and actions</p>	<p>36. Do the proposed commitments and actions address the issues described in the Prosperous Wales section of the Plan?</p> <p>Yes, Council agrees with the proposed commitments outlined in the draft Plan. However, further details on the proposed action to ensure a change in waste collection vehicles to run on electricity/hydrogen, would be welcomed. It is not clear how WG will facilitate/ resource this change and therefore further information/ clarification on such proposals would be welcomed.</p>
<p>The National Infrastructure Commission for Wales</p>	<p>37. Should air quality issues be referenced in the remit of NICW?</p> <p>Given the likely impacts that any National Infrastructure projects may have (either positively or negatively) on air quality then the Council considers it essential that air quality is referenced in the remit of NICW.</p>
<p>Transport</p>	<p>38. Are there other air quality matters relating to transport which Welsh Government should consider or review?</p> <p>The Council supports many of the views and actions presented in the consultation document and the Council hopes that the updated Wales Transport Strategy will support the bold vision we recently presented in our Transport White Paper: Transport Vision 2030, which set out Cardiff Councils our priorities over the next 10 years to fundamentally transform the way people move around the city. This will</p>

	<p>ensure Cardiff is a well-connected city where everyone can easily, reliably and safely get to where they need to go in the greenest, healthiest and most affordable way, reducing the dependency on private cars whilst adopting challenging modal split targets for active travel and public transport through investment in transformative transport projects.</p> <p>In terms of promoting a larger modal shift to active travel and public transport the current draft Clean Air Plan would benefit from some stronger actions/ commitments which could be directly linked to the updated Wales Transport Strategy. Under 'Promoting the shift from the private motor vehicle to active travel and public transport' the sole action is currently '<i>We will work with partners to ensure improved provision of public transport</i>'. Whilst actions under the other headings may contribute to promoting modal shift, more detail could also be given here – particularly as the section also states that “We recognise the challenges involved in challenging personal convenience, reconsidering habitual behaviour and adapting to change.”</p> <p>Similarly in relation to buses, the focus within the Draft Plan is on greening/ cleaning the fleet which of course is of significant importance. However there is no reference to improving service reliability/ efficiency and customer experiences of buses/ public transport which is a key aspect to encourage modal shift. The Metro section could also specify that bus will form part of the integrated Metro network, as within the draft Plan currently only rail is referenced here.</p> <p>The bold ambition to ensure both buses and taxi fleets have zero exhaust emissions by 2028 is welcomed by the Council, but more details on how this will be achieved in terms of investment requirement for both vehicles and the necessary charging infrastructure needs to be detailed.</p>
<p>Improving air quality to support sustainable places – commitments and actions</p>	<p>39. Do the proposed commitments and actions address the issues described in the Plan?</p> <p>40. Do you agree the actions will help to reduce the impact of air pollution to support sustainable places in Wales?</p> <p>41. What additional commitments or actions would you propose?</p> <p>The plan discloses target dates, which Cardiff Council consider to be quite ambitious, specifically around the zero tailpipe emissions for buses and taxis by 2028. Although the Council supports the aspirations of the plan and agree that the achievement will lead to improved air quality and will aid the shift to more sustainable modes of transport given the array of potential obstacles that may obscure the ambitions, Cardiff</p>

	<p>Council would seek further clarity and understanding from Welsh Government how the target dates were suggested and the realism of the actions proposed to meet said targets. Does the vision of ambition consider certain restrictions such as the capital investment requirements for charging infrastructure and vehicles, supply of vehicles from manufactures etc. and potential State Aid implications that may arise. Further in terms of the ambition for taxis, has there been discussions with taxi trade representatives on how drivers will be supported to achieve this transition given the barriers faced in the trade.</p> <p>It is noted that the UK Government announced on the 4th February 2020 to bring forward the ban on ICE vehicles, including hybrids to 2035 at the latest. Have Welsh Government been involved in any discussions around this policy decision and assessed how this will be implemented in Wales. The draft plan will need to be amended to reflect this recent shift in UK Government Policy.</p>
<p>Welsh language</p>	<p>42. We would like to know your views on the effects the <i>Clean Air Plan</i> will have on the Welsh language, specifically on:</p> <ul style="list-style-type: none"> a. opportunities for people to use Welsh; and b. treating the Welsh language no less favourably than the English language. <p>43. What effects do you think there would be? How could the positive effects be increased, or negative effects be mitigated?</p> <p>44. Please also explain how you believe the proposed Plan could be formulated or changed so as to have:</p> <ul style="list-style-type: none"> a. positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language b. no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language. <p>The Council has no comments on this and would expect that a Welsh Language Impact Assessment will be undertaken by Welsh Government.</p>

General question	45. We have asked a number of specific questions. If you have any related issues that we have not specifically addressed, please use this space to report them.
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Responses to consultations are likely to be made public, on the internet or in a report. If you would prefer your response to remain anonymous, please tick here:

Submit your comments by **10 March 2020**, in any of the following ways:

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