

Chartered Institute of
Environmental Health



Sefydliad Siartredig
Iechyd yr Amgylchedd

Welsh Government Consultation

A Clean Air Zone Framework for Wales

Response by CIEH

June 2018

About the Chartered Institute of Environmental Health (CIEH)

CIEH is the professional voice for environmental health representing over 8,000 members working in the public, private and non-profit sectors. It ensures the highest standards of professional competence in its members, in the belief that through environmental health action people's health can be improved.

Environmental health has an important and unique contribution to make to improving public health and reducing health inequalities.

CIEH campaigns to ensure that government policy addresses the needs of communities and business in achieving and maintaining improvements to health and health protection.

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Question 1 – Do you agree that CAZs would provide an effective way of addressing air quality challenges in Wales?

Air quality management is a core duty of environmental health professionals and our members have become increasingly frustrated by the absence of modern tools and Government support for them to do their job. CIEH believes that Clean Air Zones should be part of a wider package of measures that are necessary to provide them with the tools to address the current public health emergency posed by poor air quality.

The CIEH view is that at a local level, tackling poor air quality should be a priority for local authorities not just their Environmental Health Professionals. All local authority staff, including Town Planners, Transport Planners/Engineers should work to ensure that all new development is sustainable and that good air quality is a key component in achieving sustainability.

CIEH calls for the following as part of a wider package of measures that are necessary to address air quality challenges in Wales:

- Welsh Government commitment to give this issue the highest priority and to recognise that air quality and climate change are inextricably linked
- Welsh Government to commission further research into developing effective strategies to address the health and wider societal effects of poor air quality
- Public health and environmental health team at the local level working together to provide advice and guidance to planners, highway engineers, public and business to enable them to make informed choices and decisions about their transport arrangements
- Planning Inspectorate to ensure that due regard is given to the adverse impact large developments may have on air quality before they approve the development
- National regulation to achieve a modal shift towards zero emission vehicles e.g. setting national minimum standards for bus, truck and licensed taxi emissions; the use of financial tools, including a scrappage scheme, to remove more polluting vehicles from the roads and the development of a national infrastructure to support zero emission vehicles
- Nationally set parameters for new houses to ensure they are fit for the future e.g. the provision of electric vehicle charging points and the provision of ultra-low NOx emission boilers
- National campaigns and advertising to encourage sustainable and active transport, dissuade people from travelling by car and promoting walking and cycling in congested areas.

Clean Air Zones could provide an effective way of working toward improving air quality at certain locations in Wales, but any potential Clean Air Zone should be very carefully considered and tailored to avoid negative impacts or detract from other resource effective solutions. The CIEH welcomes the statement in the guidance that Clean Air Zones 'will not be generic one size fits all' as it will enable local authorities to implement this 'tailored' approach in their own particular environment. Reference to the soundscape requirement is also welcomed as it is now encompassed within Local Air Quality in Wales Policy guidance and the draft Planning Policy for Wales.

CIEH welcomes the proposal that to assess the potential effectiveness of a Clean Air Zone an exhaustive feasibility study should be undertaken to support the decision making process. However, such a feasibility study is resource intensive. The lack of funding, resources, area wide monitoring data, along with a lack of real-time monitors to determine what impact interventions have will be an important issue to consider as part of any feasibility study. Currently the reliance upon modelled data and subsequent future projections is not robust enough to assess the impacts of any potential Clean Air Zones.

Question 2 – Should Welsh Government direct local authorities to introduce a Clean Air Zone, and, if so, under what circumstances should it do so?

CIEH is of the view that Welsh Government should only consider direction as a last resort. It should only be considered where there is evidence that alternative action proposed by a local authority will not achieve the necessary improvements in air quality.

Question 3 - Do you consider the options/advice at section 5 to be suitable and effective elements of a CAZ?

The CIEH acknowledges the options/advice offered in the consultation document and that combinations of various options, in suitable locations of elevated concentrations, are likely to have significant impacts in reducing measured concentrations of NO₂ and other pollutants. The primary source of pollutants giving rise to declarations of AQMA's in Wales relate to vehicle emissions and NO₂; given the likelihood that major infrastructure works would be required to implement a Clean Air Zone a 'collaborative approach' would be necessary for a local authority to co-ordinate these substantial works. The CIEH is aware that some local authorities are already carrying out several of the measures suggested within the consultation document. Designation of a 'charging or non-charging' Clean Air Zone is likely to place significant financial and other resource pressures on local authorities who are already stretched.

The support options referred to in connection with public transport and replacement of vehicles on routes of interest must have regard to the knock-on effects on surrounding areas within a local authority and to neighbouring authorities. The outcome of Welsh Government's work with local authorities to influence public transport providers to utilise cleaner vehicles will play an important part in providing tool-kits for local authorities to utilise in partnership with transport providers.

The CIEH acknowledges that 'Improvements to the natural environment/green infrastructure', may improve air quality, however, the area of vegetation required to achieve a reduction in pollutant concentrations is likely to exceed the available space at 'hot spot' locations.

Question 4 – Do you agree that the minimum emissions standards outlined in Annex 2 of the CAZ Framework should be applied to determine road vehicle access in Welsh CAZs, and that these standards should be tightened over time in order to apply more rigorous real-world emissions data?

Yes, however the proposal to restrict and then tighten emission standards over time within a Clean Air Zone is looking at the 'Long Term' effect which could be considered contrary to the Ministerial Forward which suggests that Clean Air Zones are a means of delivering a 'marked and sustained improvement within a short timescale'.

Whilst unrestricted access for the least polluting vehicles is accepted to be a strong driver to encourage uptake of newer, better emission standards vehicles, CIEH is concerned that this will penalise members of the local population that may not be able to afford newer vehicles. Whilst the guidance advises that emission standards will apply equally to all, it will be vital to ensure that suitable measures are identified so as to not make local residents feel their health and well-being is not being further eroded.

The CIEH is concerned there is no contingency plan in place should a feasibility study illustrate that air quality concerns persist even though the majority of the traffic fleet complies with the minimum requirements of the emissions standards permitted for access to a Clean Air Zone.

Question 5 – Do you agree that Local Authorities should have flexibility to target only those vehicles that may be presenting the biggest air pollution problems locally, or should access restrictions apply to all categories of vehicle, wherever CAZs may be introduced in Wales?

Yes, flexibility is important. Local authorities should be given the flexibility to decide the most appropriate approach having regard to the characteristics of the areas to be targeted.

Question 6 - Should local authorities have the flexibility to vary the times that CAZ restrictions should operate, or would full-time operation provide the most desirable solution in terms of meeting air quality challenges?

The CIEH is of the view that local authorities should have flexibility over the times Clean Air Zones operate. The overarching aim is to achieve compliance and reduce exposure to poor air quality. Whatever approach is adopted, it will be important for motorists and others impacted by the introduction of a Clean Air Zone to be provided with clear information. Failure to provide clear information will almost inevitably mean increased enforcement costs for local authorities and reduced credibility and public support for the initiative.

Question 7 – Should Welsh Government consider options for mandating either a charging or a non-charging CAZ structure in Wales, or should this be left to local authority determination depending on evidence of which of the two may be the most effective means of reducing airborne pollution locally?

The CIEH is of the view that charging decisions should be made at a local level and that Welsh Government should not mandate either a charging or non-charging structure. The costs associated with implementing a Clean Air Zone are likely to be significant and the decision to introduce charging should be considered on a case by case basis by locally elected members.

Question 8 - Would a part-charging model bring any benefits over the alternatives of a total ban on non-compliant vehicles, or a charging system with full coverage within the CAZ?

Part-charging may be a useful approach to phasing in the implementation of a Clean Air Zone although it is likely drivers will simply change their routes to avoid the relevant charging periods and displace pollution to other areas.

Question 9 - Should local authorities have full flexibility to determine the level of any access charges they may apply, or should Welsh Government establish national criteria for local authorities to refer to?

Whilst the CIEH is of the view that the decision whether or not to charge is one that should be taken locally, should a decision to charge be made, then the CIEH is of the view that charging should be consistent across Wales and as such it would be appropriate for Welsh Government to develop national charging criteria. Variations in charges across Wales would almost certainly attract criticism and dealing with the consequences of this would likely take an inordinate amount of scarce local authority resource.

Question 10 - Do you agree with the proposed vehicles and categories of drivers that should be exempt from meeting published access requirements within a CAZ?

Yes, the CIEH agrees with the proposed vehicles and categories of drivers set out in Annex 3 that should be exempt from the access requirements within a Clean Air Zone. There is evidence to link area of high deprivation with declared AQMA's and it will be important to assess and address local residents concerns that they are not being further penalised for where they live.

Question 11 - Do you think sufficient consideration has been given to non-road sources of air pollution in the Framework?

The Framework has considered approaches to non-road sources of air pollution however, the CIEH is of the view that further research into the impact and contribution of domestic and non-domestic wood burning on air quality is required.

Question 12 – How best should information about a CAZ be made publicly available in order to ensure the clearest and widest possible notice of what access restrictions will mean to those travelling within the area?

The provision of good quality, timely information about Clean Air Zone restrictions will be key to their success. The widest possible coverage will be achieved using a range of communications including, but not restricted to:

- Local and national press
- Local radio
- Local authority and Welsh Government websites
- Social media including Facebook, Twitter

- Integration of information to SATNAV technology
- Digital road signs on affected routes

Question 13 – Do you have any views on how the impact/success of a CAZ should be measured, and how this information should be used to develop a local CAZ over time to ensure the widest ongoing possible benefits for air quality?

Demonstrating the impact of Clean Air Zones is essential. Given the significant impact they are likely to have on motorists and others affected, there will be a public expectation for on-going, real time monitoring of air quality and traffic counts to evaluate the success of the initiative. The CIEH is of the view that where Clean Air Zones are introduced, real time monitoring should be carried out although it is acknowledged this could have significant cost implications.

Question 14 – Could the advice in the draft Framework have any positive or adverse effects on the Welsh language, and how could the document increase the former/mitigate the latter?

The CIEH does not have a view

Question 15 - Do you wish to make any further comments about the Clean Air Zone Framework for Wales?

The CIEH is of the view that national problems require properly evaluated national solutions. This means conducting robust, properly funded and appropriately evidenced research to not only work out what currently works, but to also identify innovative solutions that will work. This is not the role of local authorities and they should not be expected to fulfil that role. Welsh Government must ensure that we do not end up with a patchwork of local schemes, providing varying solutions with uncertain outcomes and, potentially, providing barriers and a lack of clarity not only to the operators of multi-site businesses but also to consumers.