



Deputy Clerk  
Petitions Committee  
Senedd Cymru  
Cardiff  
CF99 1NA

06 October 2020

Dear Sirs,

1. We write in reply to the request submitted by the committee for further comments and thoughts on the Clean Air Plan for Wales concerning the petition 'Protecting Children's Lungs from Harmful Pollution whilst at School'.
2. First, we would like to thank the committee for further opportunity to elaborate on our concerns that we initially raised on 21 January 2020. In our response, we will refer to matters raised in our previous correspondence to the committee, dated 15.01.20.<sup>i</sup>
3. Secondly, having been involved in the development of this plan, we are incredibly proud of what it has become. This ambitious proposal offers the opportunity to transform our country and create a greener, healthier Wales.
4. The proposed plan commits to several asks raised by the British Lung Foundation (Now Asthma UK and British Lung Foundation (AUK-BLF)) through the Healthy Air Cymru Group and seeks to enshrine them in a new Clean Air Act, we welcome:
  - a. Enshrining in law new WHO air quality guidelines,
  - b. Reviewing and updating legislative instruments to review air quality strategies every five years,
  - c. Increasing local monitoring by providing statutory duty on local authorities to assess air pollution
  - d. Introducing a White Paper on a new Clean Air Act for Wales.
5. Thirdly, it is quite clear that COVID-19 has had an impact on everyone, as the only lung charity looking after the nation's lungs we note the impact to our beneficiaries, families and communities across the country. Therefore, we cannot respond without taking into account the effect that COVID-19 has had on our environment, air quality and health.
6. The cost of such changes is deadly, and when submitting evidence, we do so with remorse at the human toll to record such a reduction.
7. However, pollution levels collated by the University of Swansea have noted the significant drop in NO<sub>2</sub> concentrations across Wales.<sup>ii</sup> The reduction is significantly lower, where roadside emissions are the main contributory factor. The effects of which have been felt by our beneficiaries with lung conditions and will benefit everyone's lung health, especially children's developing lungs.

#### **Funding at a Local Authority Level**

8. In our previous correspondence, we welcomed the reforms to powers at local authority (LA) level such as the proposed reform to smoke control zones and domestic burning, legislation which is long overdue for reform. However, we had concerns about the financial implications for councils to implement such new frameworks to tackle air pollution.
9. Although there is no direct mentioning of funding to be made available in the Clean Air Plan, there are increased references in the plan to increase resources for local authorities. However, there are still some concerns about a lack of direct promises for further funding for future clean air improvements. Recent actions by the Welsh Government has gone some way to alleviate those concerns many are referenced in the Clean Air Plan:
  - a. £1m of capital funding which has been made available to accelerate the deployment of Ultra Low Emission (ULE) refuse collection vehicles in the Welsh public sector.<sup>iii</sup>
  - b. £69 million to develop walking and cycling routes, facilities and improvements to existing infrastructure.<sup>iv</sup>
  - c. Recent £15.4 million to LAs to introduce measures to improve the safety and conditions for sustainable active travel modes in response to the COVID-19 crisis.<sup>v</sup>
  - d. Promise to work across Government and external partners to develop and align behaviour change programmes to promote active travel.<sup>vi</sup>

- e. Increased budget by 50% for the Active Journeys programme, which promotes walking, cycling and scooting to school to reduce air pollution at the school gates.<sup>vii</sup>
  - f. £25 million for Cardiff and Caerphilly councils to comply with Legal compliance NO2 limits.<sup>viii</sup>
10. We stress that there needs to be continued investment in our local communities to improve air pollution and reduce the health impacts on our future generations. Further, in authorities where the £15.4 Million of funding was granted, we call for a detailed analysis of the monitoring measures undertaken of areas of known air quality issues. Such an analysis is vital to highlight the positive health, economic and environmental impacts of such interventions so that future local authorities can suggest such means to be implemented when they update their air quality management plans.
  11. Further, we note the impact that working from home has had on the reduction of air pollution. As mentioned earlier concentrations of NO<sub>2</sub> in Wales has fallen during the pandemic.
  12. This is directly linked to the reduction of human activity as we were all asked to stay home and then to stay local.
  13. One of the significant impacts is the increase in people working from home. Research conducted towards the end of the first wave of the pandemic noted that close to half of all working adults (41%) had travelled to work between the 11th - 14th, June 2020.<sup>ix</sup> This is compared to the recent release (October 1st 2020) of 59% (a fall from 64% from the previous week).<sup>x</sup> The same release highlights that a third of the working force is currently working from home.
  14. Common sense alone can make the link that if we continue to improve resources and access to support for our workforce to work from home, then the commute to work will continue to remain low and could fall further. Such a reduction in the commute to work will, in turn, reduce traffic during hours when children are either walking, cycling, scooting or been driven to school. Meaning that in the short term, whilst combustion vehicles are still driven and active travel provisions are being improved, if we continue to work from home more, school children will be exposed to less air pollution.

## Exclusion Zones

15. As highlighted above, we welcome the increased funding and promotion of walking and cycling to school through the Active Journeys Programme, which is in collaboration with over 400 schools across Wales. However, there is still no direct comments in the plan around School Exclusion Zones.
16. The plan does highlight welcomed planned changes to strengthen car idling laws which pollute our streets unnecessarily as the car remains idle. Such idling concerns the charity and members of HAC, as such idling is seen at the school gates, increasing the levels of air pollution that children breathe. However, there is no direct mention of school exclusion zones.
17. To remind members of the committee, a school exclusion zone is a zone around a school where parents are encouraged not to drive their car to school and promote active travel instead. Such a measure could be applied alongside a 'park and stride' model (Living Streets toolkit here<sup>xi</sup>) where parents are recommended to park at another location and walk with their children or a group of children in the supervision of an adult instead of driving to the school gates.
18. We further highlighted in our previous response that children growing up around severe air pollution are five times more likely to have poor lung development. High levels of air pollution from vehicles has been linked to worsening of symptoms of conditions such as asthma, which is common in children.
19. Sustrans, in partnership with 'playing out', is working with local authorities and schools in implementing exclusion zones around schools in Wales. The plan could incorporate such a method to reduce air pollution around schools and legislate to strengthen such initiatives.
20. We would like to see school exclusion zones to be a tool available to local authorities across Wales. There are areas where it is harder to implement due to a school's proximity to the main road; however, if the plan seeks to strengthen anti-idling laws, then school exclusion zones should be part of that reform and sought to implemented where practical.

## WHO Guidelines

21. In our previous correspondence to the committee, we highlighted our concern that there is no direct commitment in the draft clean air plan to legislate WHO (World Health Organisation) air quality guidance.
22. In the current plan, it states that the Welsh Government plan is to improve air quality by: 'New evidence-based, health-focused targets for fine particulate matter (which take account of stringent WHO guidelines values) and improving national air pollution monitoring and modelling capabilities.'<sup>xii</sup>
23. Although we are concerned that there isn't a direct promise of the new Clean Air Act to legislate for WHO limits, there are, however, optimistic promises for '... concentrations across Wales to below the WHO guideline for PM2.5 where it is possible, and lower still where there is sufficient potential, and there is high public exposure or risk to sensitive receptor groups.'<sup>xiii</sup>
24. The plan highlights that the future targets for PM2.5 are underpinned by the right evidence and metrics to achieve the most significant improvement to air quality. This target is based on the current lack of understanding and analysis of measures to

achieve WHO guidance everywhere in Wales. The plan highlights that a Clean Air Advisory Panel has been established to provide independent, evidence-based advice and air quality matters in Wales.

25. We welcome the plan's commitment to reduce levels of air pollution to the lowest levels possible, as there are no 'healthy' levels of air pollution. However, we believe that the new Clean Air Act for Wales should at least set an ambition for WHO guidelines to become Wales' legal air quality limits. We understand that further research and advice may need to be taken; however, the Welsh Government should ask of the panel of when Wales could achieve such a target and legislate a timetable for implementation.

### The Clean Air White Paper

26. In our previous response, we expressed concerns about the lack of detail in the draft Clean Air Plan of the detail of the White Paper for a new Clean Air Act for Wales.
27. We further stressed that a Bill should be debated in this Senedd term. However, our call was made before the start of the COVID-19 pandemic, and we understand that the Senedd's time has been allocated to focus on the crisis.
28. We, therefore, welcome the plan's commitment for a White Paper to be introduced at the end of this Senedd term.
29. In our previous response, the draft Clean Air Plan didn't grant much detail as to the contents of the White Paper for a Clean Air Act for Wales. Some of our concerns have been alleviated as the plan sets out:
- a. Consultation on LAQM legislative intent in a White Paper by the end of this Senedd term.<sup>xiv</sup>
  - b. The Welsh Government will publish and seek to consult on a White Paper on a Clean Air Act for Wales before the end of this Senedd Term.<sup>xv</sup>
  - c. The plan highlights further examination of the evidence base for strengthening anti-idling measures and will set out proposals during 2020, in the Clean Air Act White Paper.<sup>xvi</sup>
  - d. The Welsh Government will publish and consult on a White Paper on a Clean Air Act for Wales before the end of this Senedd Term.<sup>xvii</sup>
30. However, concerning there is no further detail as to the contents of the Clean Air White Paper. Because of the nature of the proposed instrument used to introduce the new Act, there will also be no clear funding plans to accompany the aims and ambitions of this plan and no need to provide further detail than what is already stated in the Clean Air Plan.
31. We would call for the Clean Air Plan for Wales to be introduced by the Environment, Energy and Rural Affairs Minister in the Senedd to allow Members of the Senedd the proper chance to scrutiny the planned proposals and highlight their concerns for the plan. Such a statement and questions after that might unveil possible future content of the White Paper and place positive pressure on the Welsh Government to deliver this White Paper by the end of this Senedd term.

**Warm Regards,**



Joseph Carter  
Head of Devolved Nations  
Asthma UK & British Lung Foundation Wales.

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<sup>i</sup> Correspondence 15.01.20 for item 3, meeting 21/01/20.

<https://business.senedd.wales/documents/s97590/15.01.20%20Correspondence%20-%20Petitioner%20to%20Committee.pdf> Accessed 5<sup>th</sup> of October 2020.

<sup>ii</sup> Swansea University Trend Analysis of Air Pollution in Wales. Link to data can be found here:

[https://chemri.shinyapps.io/Air\\_pollution\\_change\\_in\\_Wales\\_2020/](https://chemri.shinyapps.io/Air_pollution_change_in_Wales_2020/)

<sup>iii</sup> Clean Air Plan for Wales, <https://gov.wales/sites/default/files/publications/2020-08/clean-air-plan-for-wales-healthy-air-healthy-wales.pdf> Page 54.

<sup>iv</sup> Clean Air Plan for Wales, <https://gov.wales/sites/default/files/publications/2020-08/clean-air-plan-for-wales-healthy-air-healthy-wales.pdf> Page 61.

<sup>v</sup> Clean Air Plan for Wales, <https://gov.wales/sites/default/files/publications/2020-08/clean-air-plan-for-wales-healthy-air-healthy-wales.pdf> Page 62.

<sup>vi</sup> Clean Air Plan for Wales, <https://gov.wales/sites/default/files/publications/2020-08/clean-air-plan-for-wales-healthy-air-healthy-wales.pdf> Page 62.

<sup>vii</sup> Clean Air Plan for Wales, <https://gov.wales/sites/default/files/publications/2020-08/clean-air-plan-for-wales-healthy-air-healthy-wales.pdf> Page 62.

<sup>viii</sup> Clean Air Plan for Wales, <https://gov.wales/sites/default/files/publications/2020-08/clean-air-plan-for-wales-healthy-air-healthy-wales.pdf> Page 66.

<sup>ix</sup> Coronavirus and the latest indicators for the UK economy and society: 18 June 2020, ONS. Link to data can be found here:

<https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/conditionsanddiseases/bulletins/coronavirustheukconomyandsocietyfasterindicators/18june2020>.

<sup>x</sup> Coronavirus and the latest indicators for the UK economy and society: 18 June 2020, ONS. Link to data can be found here:

<https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/conditionsanddiseases/bulletins/coronavirustheukconomyandsocietyfasterindicators/1october2020#social-impacts-of-the-coronavirus-on-great-britain>.

<sup>xi</sup> Living Streets, Park and Stride Toolkit, <https://www.livingstreets.org.uk/media/2035/park-and-stride-print.pdf>.

<sup>xii</sup> Clean Air Plan for Wales, <https://gov.wales/sites/default/files/publications/2020-08/clean-air-plan-for-wales-healthy-air-healthy-wales.pdf> Page 6.

<sup>xiii</sup> Clean Air Plan for Wales, <https://gov.wales/sites/default/files/publications/2020-08/clean-air-plan-for-wales-healthy-air-healthy-wales.pdf> Page 27.

<sup>xiv</sup> Clean Air Plan for Wales, <https://gov.wales/sites/default/files/publications/2020-08/clean-air-plan-for-wales-healthy-air-healthy-wales.pdf> Page 33.

<sup>xv</sup> Clean Air Plan for Wales, <https://gov.wales/sites/default/files/publications/2020-08/clean-air-plan-for-wales-healthy-air-healthy-wales.pdf> Page 39.

<sup>xvi</sup> Clean Air Plan for Wales, <https://gov.wales/sites/default/files/publications/2020-08/clean-air-plan-for-wales-healthy-air-healthy-wales.pdf> Page 65.

<sup>xvii</sup> Clean Air Plan for Wales, <https://gov.wales/sites/default/files/publications/2020-08/clean-air-plan-for-wales-healthy-air-healthy-wales.pdf> Page 73.