

AQS34 Individual

Senedd Cymru | Welsh Parliament

Pwyllgor Newid Hinsawdd, yr Amgylchedd a Seilwaith | [Climate Change, Environment, and Infrastructure Committee](#)

Bil yr Amgylchedd (Ansawdd Aer a Seinweddau) (Cymru) | [The Environment \(Air Quality and Soundscapes\) \(Wales\) Bill](#)

Ymateb gan Unigolyn | Evidence from Individual

General principles

What are your views on the general principles of the Bill, and is there a need for legislation to deliver the stated policy intention?

The general principles are appropriate. There is probably a need for legislation to give effect to some of the aims but not all.

What are your views on the Bill's provisions (set out according to sections below), in particular are they workable and will they deliver the stated policy intention?

National air quality targets (sections 1 to 7)

Seem appropriate

Promoting awareness about air pollution (section 8)

Seem appropriate

National air quality strategy (sections 9 to 11)

Seem appropriate

Air quality regulations (section 12)

Need to have full regard to current usage of fuels and avoid rapid curtailment of methods where significant impact would occur eg wood burning in domestic settings. Education and motivation is likely to be more effective than legislative action in many cases. Subsidised change would be important also.

Local air quality management (sections 13 to 15)

Smoke control (sections 16 to 18)

See above

Vehicle emissions (sections 19 to 21)

This is where WG have to get away from the personal agendas introduced in this area. We have seen ill thought out road transport policies introduced, on the premise that an effective public transport

system exists, which it does not, and will not for some years, and only in some areas. The cancelling of the M4 relief Road has directly promoted ongoing excess pollution including PM2.5, due to the daily lengthy queues. The reduction in urban speed limits in all areas regardless of safety concerns similarly has the result of increasing harmful emissions due to higher combustion engine speeds. From this it would be incongruous to introduce charging for road usage when WG policies, however poorly thought out, give rise to increased pollution in the first place. The effect of road usage charges on the economy also has to be realised; anything that further impedes inward investment is totally unacceptable, but it is accepted that some balance has to be achieved. This will need skilful consideration, not the use of further legislative powers which do not give the perception of government by consent of the electorate. Finally it is important that electric vehicle usage is promoted, and differential treatment of these vehicles is introduced.

National soundscapes strategy (sections 22 and 23)

Acceptable

Strategic noise map and noise action plans (sections 24)

Acceptable

General provisions (sections 25 to 28);

No comment

What are the potential barriers to the implementation of the Bill's provisions and how does the Bill take account of them?

As above. Issues of disproportionality, the perception that individual ministers' personal opinions are paramount rather than the wider context, and the discord between WG actions in some areas and the suggested legislative components.

How appropriate are the powers in the Bill for Welsh Ministers to make subordinate legislation (as set out in Chapter 5 of Part 1 of the Explanatory Memorandum)?

As above. May be considered inappropriate in some areas

Are any unintended consequences likely to arise from the Bill?

As above. Several possibilities

What are your views on the Welsh Government's assessment of the financial implications of the Bill as set out in Part 2 of the Explanatory Memorandum?

No comment

Are there any other issues that you would like to raise about the Bill and the accompanying Explanatory Memorandum or any related matters?

This consultation was poorly publicised, and the early closing date has just passed. Please could you confirm my views will be submitted?
