

AQS 14 Living Streets

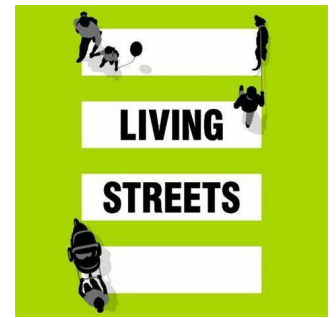
Senedd Cymru | Welsh Parliament

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 Living Streets | Evidence from Living Streets

Consultation: The Environment (Air Quality and Soundscapes) (Wales) Bill



Living Streets Cymru response

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Living Streets Cymru is the charity for everyday walking in Wales. We want to create a nation free from congested roads and pollution, reducing the risk of preventable illness and social isolation, and making walking the natural choice for everybody.

We operate a number of programmes across Wales including our flagship WOW Walk to School programme, which aims to reverse the decline in the number of children walking to school, and Walking Friends Wales which aims to increase the levels of physical activity for older and more vulnerable people at risk of social isolation and/or preventable disease.

1. Living Streets Cymru's views on the general principles of the Bill and the need for legislation to deliver the stated policy intention.

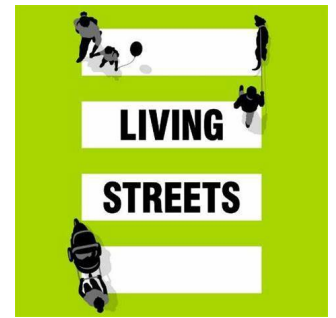
We recognise that there have been improvements to air quality, with emissions being reduced by 43% between 1990 and 2018. However, there is no safe level of air pollution. Conversely, there has been an increase in the level of transport emissions which now make the largest contribution to domestic air pollution.

Pollution from road traffic, particularly diesel fumes is the most significant cause of poor air quality and can be responsible for up to 70% of air pollution.

We must accelerate the reduction in emissions and air pollution. Doing so will reduce health and social inequalities, improve quality and life expectancy, reduce our environmental impact and reduce the burden of disease that are all associated with poor air quality.

People who walk or cycle do not contribute to poor air quality but are unfairly exposed to it. We need legislation to encourage healthier behaviours, including more people walking, cycling and using public transport as well as measure to penalise vehicle-idling, because nothing else has worked, we still see many communities

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living in air which does not meet international guidance from the World Health Organisation.

2. Living Streets Cymru's view of the following bill provisions:

2i. National air quality targets

We welcome the commitment in the Bill to seek relevant advice and to have regard to scientific knowledge, and the references to the new WHO guidelines in the EM, however we worry that there is nothing in the Bill to ensure that targets will be set to be consistent with WHO guidance, as committed to. In theory there would be nothing to prevent a Minister from choosing a much less rigorous target. It must be made clear in the Bill itself that the up to date WHO guidelines need to be the foundation of the target setting process, and that targets must be consistent with them - and must be met in the shortest time possible. We would like to see this captured on the face of the Bill, potentially listed in section 3, 5, 6 or become its own section.

Living Streets supports the commitment in the Bill to seek relevant advice and to have regard to scientific knowledge. However, we feel that the text of the Bill does not adequately reflect the ambition to improve air quality. We cannot help but recognise that improving air quality should be a universal aim and is supported across the political spectrum. However, without the impetus to improve air quality referenced specifically in the legislation, we worry that relying solely on targets being set by ministers could lead to a lack of ambition to deliver cleaner air.

Furthermore, without referencing the specific World Health Organisation targets in the legislation, it weakens the legislation. Less rigorous targets could hinder public sector ability to improve air quality.

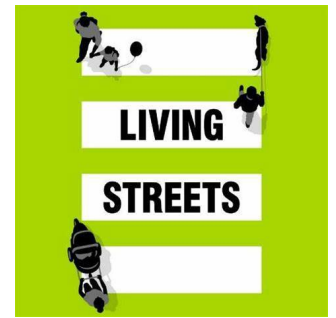
Living Streets calls on those with the opportunity to amend the legislation to include WHO guidance in the target-setting process, with the WHO guidance forming a starting point for scientific and expert advice.

2ii. Promoting awareness about air pollution

Welsh Government should run targeted informational campaigns on the environmental and health impacts of air pollution.

In promoting awareness about air pollution, Welsh Government should also commit to promoting awareness of behaviour-change solutions that can reduce air pollution. Just as public bodies will be required to have due regard for the impact on air quality,

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raising awareness of air pollution should be linked to promotion of healthy behaviours to improve our air quality such as active travel and the need for modal shift.

Research (Physical Activity through Sustainable Transport Approaches, 2019) has shown that social factors impact on behaviours. Those who valued low air pollution exposure and low environmental impacts, amongst others values, tended to walk more; “this suggests that if people could see the importance of these values, they may be encouraged to walk more” (Imperial College London News, 19 September 2019).

The current Net Zero Plan to reduce passenger miles by 10% and increase the modal share for active travel and public transport to 39% by 2030 are ambitious. However, regulatory tools within this legislation combined with a whole-system approach to promoting awareness on air pollution and modal shift will go some way towards meeting our existing Net Zero targets.

2vii. Vehicle emissions

Vehicle emissions, particularly from private cars, are one of the greatest contributors to air pollution. As a result, there is an inevitable link between the number of vehicles on our roads and the quality of our air. The number of people choosing to travel actively will be important in tackling air pollution and reducing vehicle emissions.

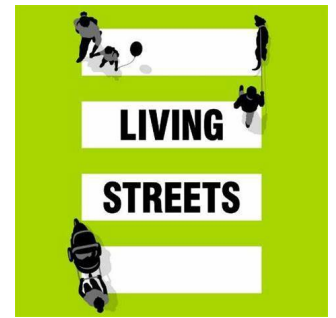
Existing targets in the Net Zero Plan to reduce emissions by 22% between 2019 and 2025, and by 98% by 2040, and highlights the need for this legislation to utilise all tools at Welsh Government’s disposal including the introduction of clean air zones under existing powers in addition to exercising trunk road charging that would be introduced in this bill.

Trunk Road charging

Living Streets Cymru supports the introduction of trunk road charging. Funds raised from trunk road charging should be ring-fenced for active travel and public transport infrastructure, to further improve air quality across Wales.

Living Streets Cymru would also support a requirement to introduce clean air zones should insufficient progress be made in individual local authorities to improve air quality. These powers already exist under the Transport Act (2000). We would urge Welsh Government to look at the use of these powers particularly where pollution levels exceed the targets set by ministers. We are concerned that trunk road charging alone will have sufficient impact.

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It is important to recognise that all vehicles create particulate matter. The Tyndall Centre found that even if all new cars were ultra-low emission vehicles (ULEVs) by 2035, a 58% reduction in car mileage between 2016 and 2035 would still be required to meet the Intergovernmental Panel on Climate Change's recommendations for air quality.

This is because electrification will not reduce emissions of fine particulate matter from brake, tyre and road-surface wear either. These now collectively exceed that of emissions from diesel and petrol cars. Hence the importance of tools to reduce overall traffic to reduce the levels of fine particulate matter in our air.

Vehicle idling

We strongly welcome S.21 amendments to the *Environment Act 1995* to make stationary idling an offence under the S.42 of the *Road Traffic Act 1988*. Every minute, an idling car produces enough exhaust emissions to fill 150 balloons with harmful chemicals, including cyanide, NOx and PM2.5.

A 2016 study found that one factor in people choosing to make journeys on foot was environmental aesthetics, including air quality and fresh air (Dadpour et al. 2016, *Int J Environ Res Public Health*: 731). With cleaner air we can encourage people to travel actively and promote the benefits of outside physical activity.

However, we would welcome clarity on how the Welsh Government expects penalties for stationary idling to be issued, and which bodies will be tasked with the enforcement of the offence.

4. How appropriate are the powers in the bill for Welsh Ministers to make subordinate legislation?

In many ways the Bill gives too wide-ranging powers, but there are sections where these powers don't go far enough. Sections 1 and 2 for examples give powers to set targets but Ministers are not constrained by how ambitious or how urgent these targets are in improving air quality.

As stated earlier, we would like to see the World Health Organization limits recognise somewhere within the legislation itself rather than just referenced in the appendix. However, there are other areas where ministerial powers are constrained. On smoke control areas, the power to establish one seems to remain with the local authority, whilst S.19(1)(b) places constraints on when Ministers would be able to introduce trunk road charging.