

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 Coleg Brenhinol y Meddygon Teulu Cymru Wales | Evidence from Royal College of GPs Cymru Wales

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?

RCGP Cymru Wales support the general principles of the bill. Wales has some of the worst air quality in Europe and indeed the UK, with Cardiff suffering higher levels of some pollutants than London, including nitrous oxide and particulate matter. The latter is proven to exacerbate or cause conditions such as asthma and migraine and has the potential to shorten lives. Greener General Practice notes the considerable impact poor air quality has on lung health on its website (<https://www.greenerpractice.co.uk/>)

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)

The targets are a step in the right directions for improving the quality of air. Using the PM2.5 measure is sensible as, as stated above, particulate matter is the most dangerous pollutant to health. While the Bill leaves it to subsequent regulations to devise the actual figure, RCGP Cymru Wales recommends that we must work towards the World Health Organisation recommended figure of 5micrograms per cubic metre.

Promoting awareness about air pollution (section 8)

While there is a general feeling the air pollution has a negative impact on health, more needs to be done to publicise the causes of poor air quality and its effects on individuals. Anecdotal evidence suggests that members of the public are more concerned with any inconvenience caused by traffic calming or reductions methods as they are not aware of the serious impact on health of vehicle emissions.

UK Health Alliance notes that the public will actively complain to the relevant authority if there tap water is not clean, however we seem to accept poor quality air, as the dangers are not obvious to us.

National air quality strategy (sections 9 to 11)

RCGP Cymru Wales supports the aims of the national air quality strategy, however, would urge all public bodies to take a pragmatic approach in its application to avoid unintended consequence such as preventing disabled attendees to event, by only allowing active travel, for example.

Air quality regulations (section 12)

By imposing a duty to consult with so many bodies before making regulations, RCGP Cymru Wales is concerned that this may cause delay to the drafting of those regulations.

Local air quality management (sections 13 to 15)

RCGP Cymru Wales supports the requirement for local authorities to plan and report their activities regarding air quality and the other provisions in this section.

Smoke control (sections 16 to 18)

RCGP Cymru Wales supports the reduction of high emissions fuel in homes, however the Welsh Government must take affirmative action to promote renewable fuels in as many homes in Wales as possible.

We note the steps taken to provide free solar panels to homes not connected to mains gas, however with the price of gas rising, news outlets this year report that individuals in the UK are using wood burners even when they are connected to mains gas.

While only focussing on homes with no alternative will improve air quality in the short term, introducing renewable sources of heat to as many homes as possible is a necessary long solution to curb the long-term health and wellbeing effects of climate change at large.

Vehicle emissions (sections 19 to 21)

While the dangers of emissions are evident, these must be accompanied by improvements to the active travel network. There is evidence of this investment, however projects are not coming into fruition at rate which will help air quality in the short term. As an example, according to air quality research service IQAir.

Chepstow currently has PM2.5 levels double the safe level recommended by WHO. This is due to almost constant, slow-moving traffic through the narrow streets of the town. Idling, which is addressed by the bill, is an easily preventable threat to air quality, however lack of public transport, poor road layouts and amenities outside of local areas are wider ranging causing of the overall number of cars on the roads, which if tackled, would have a larger impact on air quality as well as overall health. The bill focussing on easily achievable outcomes, however RCGP Cymru Wales believes that these will not go far enough to address this far reaching and critical problem. Greener General Practice highlights that over half of school run journeys in the UK made by car are between 1 and 5 miles, showing the public transport is not an attractive option for these journeys, while around 60% of commutes to work are also made by car.

National soundscapes strategy (sections 22 and 23)

Strategic noise map and noise action plans (sections 24)

General provisions (sections 25 to 28);

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

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)?

Are any unintended consequences likely to arise from the Bill?

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?

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