

## AQS31 Individual

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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

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### 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?

I think the principles are very good and yes, there is a need for this legislation.

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)

I would like to see stricter targets but I doubt that is going to happen. We do have to be realistic about what can be achieved.

Promoting awareness about air pollution (section 8)

I would like to see posters and leaflets at all Welsh GP surgeries, clinics and hospitals explaining, with simple diagrams, the causes of air pollution and the effects on our health. I would like this to include all forms of wood and coal burning, mentioning that even when smoke is not visible, emissions are present (perhaps just smaller?). I would also like to see ALL local authorities in Wales using real-time air quality monitoring systems in ALL their town centres (NO2, PM2.5/10) and not just in those areas where an AQ management concern has already been raised. If no on-the-spot continuous measurements are ever made, no one knows the true level of the air pollution (good or bad) and computer modelling cannot tell us this (especially if the computer modelling is based on levels taken somewhere many miles away as is the case at present for most of north and mid Wales). Public awareness can be better promoted this way - with relevant live local data, please - all across the whole of Wales. Now.

National air quality strategy (sections 9 to 11)

I think the combined approach mentioned in the Memorandum is appropriate.

Air quality regulations (section 12)

I think it is important for Welsh Ministers to have their own mechanisms for setting targets. They must now arrange for the collection of sufficient data to be sure that progress really is

being made towards the targets, and to ensure it is published. And then ensure that the targets are met, of course. I am a little concerned how long this will take.

#### Local air quality management (sections 13 to 15)

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As I have said above, I am very concerned there is still no local air quality monitoring in the towns near where I live (Mid-North Wales). It is being assumed that there is no problem and hence no need but I suspect this is wrong. Local measurement taking (PM and NO<sub>2</sub> esp.) should be obligatory for ALL the regions/local authorities across Wales. Point 3.124 says, "Assessment of air quality is focused on locations where members of the public are regularly present and where there is exposure to the pollutant in question over the timescale for which the air quality objective is defined. Local authorities are legally obliged to demonstrate that they are doing everything reasonably possible to work towards the legal objective values". This sounds good - but if any of the said pollutants are NOT even being routinely monitored, how can anyone possibly know if there is a "breach" of some kind? (see Point 3.126., please).

#### Smoke control (sections 16 to 18)

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Point 3.114 says, "Section 87(7) has remained largely unchanged since the Environment Act 1995 received Royal Assent, almost 28 years ago. It is no longer reflective of best practice in relation to consultation. For example, it does not require the public to be consulted about regulations made under Part IV". So, please can we have some public consultations on what exactly is meant by a "smoke control" zone? And if breached, how will the local authority deal with the matter? Again, this brings us back to the question of awareness. I agree that it is time to replace the criminal offence of emitting smoke from a chimney in a SCA with a civil sanctions regime instead. It is not clear to me, however (point 3.158) how the Government intends to raise awareness of the new legislation, or how local authorities will advise the public on the impacts of poor burning practice - and the very serious health issues thereto. Leaflets? Lectures?

#### Vehicle emissions (sections 19 to 21)

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I would like to know why bus companies still permit their vehicles to wait for 15 mins or more in our town centres in the afternoon, with idling engines pumping out fumes over school children and the elderly (indeed everyone and anyone). Is this legal or not?

#### National soundscapes strategy (sections 22 and 23)

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No comment - all sounds sensible, thank you. But, of course, some people are far sensitive to noise than others - and the kind of noise matters.

#### Strategic noise map and noise action plans (sections 24)

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No comment - except how easy will it be to put into action? Pilot study?

#### General provisions (sections 25 to 28);

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No comment.

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

Finances may be a problem, and too many meetings about more meetings? Time is of the essence?

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)?

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Sorry, I do not know enough about this matter to comment.

Are any unintended consequences likely to arise from the Bill?

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Wood burning will continue unchecked in areas where there is no "smoke control". No mention of pollution from bonfires which I had hoped for. It will be (wrongly) assumed that all this burning is not a problem. Same with controlled/prescribed burns on farmland. Shouldn't we all be moving towards recycling as much as possible, composting and using mechanical means to clear weeds wherever possible? Did I miss that? It all contributes to the air quality/pollution. If not mentioned, it will be ignored.

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?

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Sounds sensible but I am not an expert in the area.

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

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Yes. Where the EM (3.40) says, "Our air is cleaner in general terms than at any time since the industrial revolution", I am not convinced that applies uniformly across the whole of Wales. Yes, our cities and industrial areas are no longer full of coal soot but now we seem to have plenty of wood smoke instead? And so very many more vehicles on the roads - in deed the whole of the UK is criss-crossed with roads full of polluting traffic. So, in some ways the air may be cleaner, but not entirely - as we have other kinds of more insidious air pollution now. We should not give the impression it is all going well. For example, 3.151 says, "According to the Air Pollutant Inventories for England, Scotland, Wales and Northern Ireland: 2005-2020 report, domestic and commercial burning of solid fuels is estimated to be the largest source of PM2.5 in Wales and is attributed, in part, to the rise in the number of wood-burning stoves being installed in homes throughout the country". I understand that this wood burning is on the increase - how can we stop it from becoming the "new coal". Nothing on that in the EM/Bill?

Yes, 3.79 says, "The adverse effects of air pollution on health are not being sufficiently communicated to patients and their carers by medical and in nursing professionals.". I did not see that point picked up any further in the Memorandum - is there something on it in the Bill itself? It does sound rather important. Also, 3.212. says, "Our primary aim is to enhance the deterrence provided by the current anti-idling penalties regime". I was not clear as to how that "deterrence" will operate. 3.213 says, "We want to minimise risk to vulnerable receptors by tackling unnecessary vehicle idling in idling hotspots.. ". Yes, but have you said exactly how this will be done? I see under 3.224, you say "Ultimately, it will be a matter for local authorities to make the decision as to the level at which to set FPNs in particular circumstances, having had regard to the guidance" but who will check that local authorities carry this out, please? Under 7.203, "toolkits" are mentioned (or legislation, but what would that amount to?)