

Asthma + Lung UK

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Chair, Climate Change, Environment, and Infrastructure Committee
Senedd Cymru
Cardiff Bay
CF99 1SN

Sent via email to: SeneddClimate@senedd.wales

Subject: Concerns Regarding the Welsh Government's Approach to Air Quality and Smoke Control

Dear Chair,

I am writing on behalf of Asthma + Lung UK Cymru to express our concerns regarding the Welsh Government's approach to air quality management and smoke control, as outlined in the recent consultation on Local Air Quality Management (LAQM) and Smoke Control Guidance.

While we welcome the Welsh Government's commitment to implementing the Environment (Air Quality and Soundscapes) (Wales) Act 2024, we are deeply concerned that the proposed guidance fails to provide the necessary ambition and clarity required to protect public health.

Concerns Regarding Local Air Quality Management (LAQM) Guidelines

Air pollution is one of the greatest environmental threats to public health in Wales, contributing to approximately 2,000 premature deaths per year. Particulate matter (PM2.5) and nitrogen dioxide (NO2) are particularly harmful, exacerbating respiratory conditions such as asthma and COPD, increasing cardiovascular risks, and contributing to mental health issues and dementia. Despite this, the proposed guidance does not go far enough in mandating stronger enforcement measures, expanding Smoke Control Areas (SCAs), or ensuring effective monitoring of air pollution, particularly in communities most affected by poor air quality.

We are also concerned about the lack of a robust public awareness strategy to educate residents on the dangers of air pollution. Without significant behavioural change, enforcement measures alone will not be sufficient to reduce emissions from domestic burning. The failure to link this guidance with the Healthy Air, Healthy Wales strategy is a missed opportunity to align local and national efforts in tackling air pollution.

Concerns Regarding Smoke Control Guidance

Our Freedom of Information requests have revealed that no councils with existing SCAs have taken enforcement action in the past five years. This suggests a lack of awareness, resources, and incentives to implement effective smoke control measures. The current guidance does little to address this, as it does not encourage the expansion of SCAs beyond the existing four local authorities, nor does it provide financial and technical support for enforcement activities.

We urge the Welsh Government to take immediate action to strengthen the guidance by:

1. Introducing stronger enforcement mechanisms to ensure Local Authorities actively implement and enforce air quality and smoke control measures.
2. Investing in a national public awareness campaign on the dangers of air pollution, particularly from domestic burning, to drive meaningful behavioural change.

3. Expanding Smoke Control Areas beyond the current four authorities to protect more communities from harmful emissions.

Concerns Regarding Idling Guidance Delays

We are further alarmed by the delays in implementing idling guidance as outlined in the Environment (Air Quality and Soundscapes) (Wales) Act 2024. Emissions from idling vehicles, particularly outside schools and public spaces, pose a serious health risk, especially to vulnerable individuals and children. Immediate action is required to enforce stronger anti-idling measures and protect public health.

We urge the Welsh Government to:

1. Expedite idling guidelines so they can be published in this Senedd.
2. Ensure local authorities have the resources to implement and enforce idling fines effectively.
3. Raise public awareness on the dangers of vehicle idling through education campaigns.

Conclusion

Without urgent improvements to this guidance, the Welsh Government risks failing in its duty to protect public health from the serious consequences of air pollution. The lack of decisive action, as proposed in line with Healthy Air, Healthy Wales will also see this Government failing to discharge its duty to future generations. We urge the Committee to prioritise this issue and hold the Welsh Government accountable for delivering stronger, clearer, and more effective air quality policies. We would be willing to discuss the further and provide any additional evidence the committee requires.

Yours sincerely,
Joseph Carter
Head of Asthma + Lung UK Cymru



Joseph Carter
Head of Devolved Nations
Pennaeth Cenhedloedd Datganoledig