

Lesley Griffiths AC/AM  
Gweinidog yr Amgylchedd, Ynni a Materion Gwledig  
Minister for Environment, Energy and Rural Affairs



Llywodraeth Cymru  
Welsh Government

Ein cyf/Our ref LG/05014/18

David John Rowlands AM  
Chair - Petitions Committee  
National Assembly for Wales  
Cardiff Bay  
Cardiff Bay  
CF99 1NA  
Government.Committee.Business@gov.wales

Dear David

18

December 2018

Thank you for your letter of 29 November regarding Petition P-05-839, in which the British Heart Foundation Cymru is calling for the adoption of World Health Organisation (WHO) guidelines into Welsh law and the introduction of a new Clean Air Act for Wales. I am responding as this matter now falls within my portfolio.

I would like to reaffirm the Welsh Government's commitment to improving air quality in Wales. As set out in the response to you of 22 October from the previous Minister for Environment, this summer the Welsh Government established a Clean Air Programme. The aim of the Programme is to reduce the burden of poor air on human health and the natural environment, and also the requirement to comply with European and domestic legislative obligations. This is an ambitious programme which aims to address not just the emission and impacts of nitrogen dioxide, but all harmful air pollutants.

We must meet our legal obligations as a priority but I also recognise that air quality improvement in Wales must reach beyond this in order to protect and improve health and wellbeing in the longer-term. At the heart of the programme is the importance of coherent action. Action needs to be taken where it is needed the most, based on robust evidence in relation to all airborne pollutants. As part of the Welsh Government's actions to tackle levels of nitrogen dioxide along roads where statutory limits are exceeded, we have also required Local Authorities to consider levels of particulate matter when deciding on two or more equally effective measures.

My views on the British Heart Foundation Cymru's response to the previous Minister for Environment's letter of 22 October are set out below.

Bae Caerdydd • Cardiff Bay  
Caerdydd • Cardiff  
CF99 1NA

Canolfan Cyswllt Cyntaf / First Point of Contact Centre:  
0300 0604400  
[Gohebiaeth.Lesley.Griffiths@llyw.cymru](mailto:Gohebiaeth.Lesley.Griffiths@llyw.cymru)  
[Correspondence.Lesley.Griffiths@gov.wales](mailto:Correspondence.Lesley.Griffiths@gov.wales)

Rydym yn croesawu derbyn gohebiaeth yn Gymraeg. Byddwn yn ateb gohebiaeth a dderbynnir yn Gymraeg yn Gymraeg ac ni fydd gohebu yn Gymraeg yn arwain at oedi.

We welcome receiving correspondence in Welsh. Any correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in responding.

## Ensuring WHO guidelines are observed by Welsh law

The WHO has recommended ultimate concentration levels of particulate matter for PM<sub>10</sub> and PM<sub>2.5</sub>. They are half the current EU limits and the WHO recognises the challenge in reducing population exposures to particulate matter, recommending a phased approach.

Guideline values recommended by WHO acknowledge when formulating policy targets, governments should consider their own local circumstances carefully before adopting the guidelines directly as legally based standards. Sources of particulate matter comprise of local primary emissions direct to the atmosphere and secondary particles formed by chemical reactions in the air. Particulate can also travel large distances over national boundaries, with impacts occurring far from the original source. My officials are considering the WHO guideline levels along with existing evidence across Wales to assess the practical aspects of achieving improvements in ambient concentrations. Any future targets need to be underpinned by evidence in the context of Wales to ensure they deliver the most effective change, supporting the delivery of our well-being goals.

## Clean Air Zones

I believe Local Authorities should have the flexibility to determine the most appropriate response to meet local air quality needs. There must be a balance to ensure Local Authorities have a choice of actions to enable delivery of desired outcomes. However it is important to have a level of national consistency, which is achieved through a guidance framework. A Clean Air Zone may not always be the most appropriate means of achieving air quality improvements, for example outside of urban areas where no alternative routes are available.

I do not currently intend to place a requirement on Local Authorities to introduce a Clean Air Zone, whether charging or otherwise. However, as part of our development of a Clean Air Plan for Wales, my officials will work with stakeholders to consider the opportunities presented by Clean Air Zones and how they may be integrated with wider Government policies. Although there are currently no proposals to introduce a Clean Air Zone in any part of Wales, I would expect Local Authorities to assess their potential where it is evident that action is required to achieve reduced pollution levels and an improvement in public health.

The draft Clean Air Zone Framework for Wales recognises potential opportunities associated with charging an entry fee for non-compliant vehicles. For example, it can help fund public transport improvements and encourage active travel, whilst reducing the number of polluting vehicles entering the zone. Caerphilly County Borough Council and Cardiff Council are currently modelling the potential for charging Clean Air Zones to bring forward compliance with nitrogen dioxide limit values. Should a charging Clean Air Zone be identified as the best option in either case, I will issue a further direction requiring their introduction in the soonest time possible.

I would like to clarify Clean Air Zones aim to reduce all types of air pollution, including, but not restricted to, nitrogen dioxide and particulate matter. The draft Clean Air Zone Framework for Wales acknowledges this. Traffic management within a Clean Air Zone will need to include action to reduce the overall volume of traffic and also to reduce the pollution emitted by remaining vehicles by restricting access to only the least polluting.

## ULEV funding

The draft budget 2019-20 published in October, is the third budget of the fifth Assembly and falls within the final year of the UK Government's current Spending Review settlement. This draft budget sets the Welsh Government's revenue budget for the period to 2019-20 and the capital budget until 2020-21.

The UK Government has said it will carry out a new Spending Review in 2019. We do not know yet the timing of the Spending Review, the period for which it will set budgets and what impact this will have on the Welsh Government's budget in the future.

We have successfully made the case for extra capital from central budgets for the establishment of the Active Travel Fund. This is in addition to funding the Welsh Government makes available annually through the Local Transport Fund, Safe Routes in Communities and Road Safety Grant.

The Active Travel Fund will see an additional £60 million allocated to active travel schemes across Wales over this and the coming two financial years, with £10 million in 2018-19, £20 million in 2019-20 and £30 million in 2020-21. Whilst it is not yet at the level that you would like to see, it represents a significant increase, which has to be considered against the context that we also fund active travel improvements from our £5 million Safe Routes in Communities Grant, the £31 million Local Transport Fund and the £4 million Road Safety Grant.

In 2018/19, we have already allocated close to £30 million for active travel improvements, most recently with the allocation to schemes benefiting from additional Local Transport Funding this year.

## Air quality monitoring

Resources aimed at tackling poor air quality need to be targeted effectively and the type and level of assessment, including the number and location of monitoring stations, needs to be proportionate to the likely risk. Human exposure to air pollution occurs in many places. This can include in the home, at school, at workplaces and whilst travelling, where individuals will be exposed to other sources of pollution. Human exposure assessment is a developing field which is important for the management of public health protection. We will keep developments under review and welcome the active involvement of stakeholders to capitalise on potential development opportunities.

Information on monitored levels of air quality across Wales is available on the *Air Quality in Wales* website (<https://airquality.gov.wales/>). This includes monitored levels at Hafod-yr-ynys. The website also provides an air pollution forecast tool and related public health advice.

Ensuring the national approach to assessing air quality across Wales is right is an important aspect of the work being undertaken to underpin the Clean Air Programme and future Government policy. The Evidence, Innovation and Improvement Project will help to do this, complementing existing evidence on airborne pollution with timely and more local evidence where it is needed, to enable better targeted actions and policies in Wales. This may be supported by the deployment of mobile monitors and modelling, if it is appropriate. The work will aim to enhance collaboration between stakeholders to help drive and evaluate air pollution reduction interventions, enabling a long-term and prevention focused approach across Wales. I want to maintain and enhance the assessment of air quality across Wales to enable positive improvements including through a combination of mapping, monitoring and modelling, as appropriate.

## Domestic wood burning

I am aware of Defra's consultation on cleaner domestic burning of solid fuel and wood. My officials continue to work closely with Defra as we develop our own Welsh policy in this area.

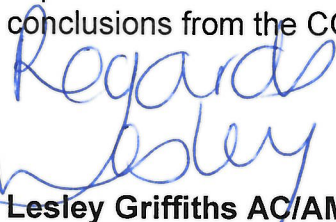
Since my previous correspondence, I have asked my officials to convene a Task and Finish group, made up of key stakeholders, to oversee work in this important area. The first meeting is planned to be held in January 2019. I have clarified the focus of initial meetings must be on identifying a package of early intervention measures which have the potential to considerably reduce pollution and improve air quality. This may (and is likely to) include a restriction on the sale of wet wood and a prohibition on the sale of house coal, amongst other things. I want the group to consider any and all options in relation to pollution from domestic burning and I am not ruling anything out at this stage.

I agree more information needs to be made available to the public about the impact of domestic burning. We need to raise awareness and prevent the burning of dirty fuels. In addition, we must educate people on the correct way to burn and more generally in the use of their appliance to ensure burning is efficient and less polluting. The need to encourage regular maintenance of such equipment is also important to achieve efficient burning. My officials have met with representatives of Hetas, Woodsure, the Stove Industry Alliance and the Guild of Chimney Sweeps to discuss how, in the short term, we can support and promote existing dedicated campaigns intended to raise awareness with consumers and offer advice on reducing pollution. This will be done in addition to communications and awareness raising communications developed by the Welsh Government. Success in this area is dependent on improved public awareness and action taken to burn more efficiently, economically and considerately.

The Welsh Government's Warm Homes Programme Arbed scheme has previously worked in collaboration with gas distributors to connect off grid properties in Wales to the gas distribution network. Under the Welsh Government Warm Homes Programme, proposals for schemes under Arbed 3, the area based fuel poverty scheme, are being developed. In taking forward these schemes, we are keen to work with industry to explore opportunities to extend the gas distribution network and access alternative technologies.

Any measures delivered under the Warm Homes Programme are and will continue to be based on a whole house assessment. This ensures the right measure is installed for individual properties.

I welcome the further views and continued interest from the British Heart Foundation Cymru in improved air quality for Wales. I can assure you we will take account of their policy aspirations as we develop our future clean air policy. This includes consideration of the conclusions from the COMEAP report into air pollution and cardiovascular disease.



**Lesley Griffiths AC/AM**

Gweinidog yr Amgylchedd, Ynni a Materion Gwledig  
Minister for Environment, Energy and Rural Affairs