

## Local air quality and noise management in Wales

Consultation response from the British Lung Foundation  
Cymru Wales



### Introduction

We are the only charity in Wales campaigning for the nation's lung health, with the aim of ensuring everyone in Wales breathes clean air with healthy lungs. Being specifically a health charity, we respond to this consultation with the health impact of air pollution in mind. Due to the nature of our work we will not respond to the questions regarding noise pollution.

Research has shown that dirty air has a huge impact on all our health. For people who already have a lung condition, it worsens their conditions and increases their chance of hospitalisation. For all of us, it increases our risk of lung cancer and conditions like asthma. For children's growing lungs, pollution can do lasting damage to their development. Pollutants in the air have been linked to over 1,300 early deaths a year in Wales and 40,000 across the UK<sup>1</sup>. Overall air pollution is estimated to cost the UK economy around £27 billion a year.

Our response to this consultation seeks to help reduce the effects of air pollution on Wales' lungs.

### Consultation questions

**Q1.** "In section 6 of this consultation document we asked a number of questions about the changes we are considering taking forward in the first year of this five-year Assembly, alongside a review of national planning policy and guidance on air and noise pollution.

**"Please use this space to answer the questions asked in section 6 of this document. Is there anything you think we should be doing differently?"**

**6.1** - We would support any simplifying of the reporting process for local authorities in order to reduce unnecessary burden on staff and enable more resources to be directed into directly tackling air quality issues. Our only concern

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<sup>1</sup> Department for Environment, Food and Rural Affairs (DEFRA), 2013: *Impact pathway guidance for valuing changes in air quality*.

would be ensuring there is no reduction in the overall information contained within the new annual progress report compared to the present reporting arrangements. We would also like to see increased transparency regarding the publication of reports, ensuring that they are readily available and accessible to all.

**6.2** - We believe that while further efficiency could be gained by local authorities pooling resources regarding tackling air quality, individual annual progress reports should be retained to enable local people to more effectively hold their own local authority to account.

**6.3** - We believe it is important for progress reports to be submitted to Welsh Government in a timely manner, to enable both Welsh Government and local people to effectively scrutinise their actions.

With this in mind, we would recommend shortening the deadline enforcement timescale to mean that section 85(3) directions by Welsh Ministers would come three months following the deadline, rather than six. We would also encourage the Welsh Government to consider imposing fines on local authorities who fail to submit their reports within this three-month window.

**6.4** - Despite not being a local authority, we would support a common format for annual progress reports to ease the comparative analysis of data, and ensure greater efficiency in the reporting process.

**6.5 and 6.6** - We would agree that this information should be included.

**6.7** - We are concerned that focusing on these two pollutants alone, while ignoring other known harmful pollutants, could have an adverse impact on the respiratory health of people in Wales.

We believe local authorities should be encouraged to reduce any known unsafe levels of any kind of harmful air pollution. In particular, clear World Health Organisation guidelines exist on permitted levels of ozone (O<sub>3</sub>) and sulphur dioxide (SO<sub>2</sub>), both of which are known to cause significant respiratory difficulties among those with a pre-existing condition, as well as other health effects<sup>2</sup>.

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<sup>2</sup>Ambient (outdoor) air quality and health, *World Health Organisation*, September 2016: <http://www.who.int/mediacentre/factsheets/fs313/en/>

**6.8** - We agree that the proposed changes, subject to our previous comments in this document, should be introduced in time for next year's reporting.

**6.9** - We agree that, in addition to tackling specific pollution hotspots, an increased emphasis should be placed on reducing population-wide air pollution to improve lung health across the board. We would stress the need for greater priority to be given within new policy guidance to reducing pollution around schools and in other areas where children and young people are often present, due to the disproportionately high impact that air pollution can have on a child's lung health compared to an adult's fully grown lungs. We would also ask that local populations with higher rates of diagnosed lung diseases such as COPD be prioritised for air pollution reduction efforts, in order to reduce exacerbations and therefore lessen the strain on health services.

**6.10** - We would welcome increased joint working between LHBs and NRW in order for air pollution to be tackled as a public health issue. We also believe that bodies such as Public Health Wales should do more to publicise warnings and appropriate health and impact mitigation advice ahead of periods of high pollution. Advice on managing exposure to pollution should also form part of clinical guidelines for all relevant disease areas, so that at-risk groups are aware of how they can better manage their condition.

We would also welcome further collaboration and partnership working between LHBs, NRW, local education authorities and education consortia to ensure air pollution within the vicinity of schools is addressed. Given the particular impact pollution has on children's lungs, Welsh Government should support the production and dissemination of accurate, practical advice for schools to help them (with the participation of parents and guardians where necessary) reduce the impact pollution has on their students.

**6.11** - Research undertaken by the British Lung Foundation using Freedom of Information requests showed major discrepancies in the quality and quantity of air pollution monitoring across Wales. This was due to inconsistent interpretation of guidance, in particular in relation to whether schools were viewed as a priority for air quality monitoring.

Recent statistics from the World Health Organisation found that levels of particle pollution in Port Talbot, Swansea and Cardiff are unsafe. Levels of nitrogen dioxide (NO<sub>2</sub>) also exceeded legal limits in 2013 in the Cardiff area. Despite this, our FOI

research found that one school in Swansea has a pollution monitor nearby, and not a single school in Cardiff did.

We believe the guidance given to local authorities should be amended to ensure there is adequate monitoring of air pollution near schools, and other areas where vulnerable communities frequent. Pollution and transport should be mandatory material considerations in all local authority planning application assessments relating to new schools, in order to cut the number of children being schooled in areas high pollution over time. All existing schools should conduct regular monitoring of air pollution, the results of which should be made accessible to parents/guardians, and published as part of school inspection reports. Actions and measures should also be taken to reduce the level of pollution inside and outside schools, through the use of good air filtration systems and other pollution absorbing measures, as appropriate.

**6.12** - We would encourage the maximum promotion of any available additional resources that enable local authorities to tackle air pollution and implement local air quality action plans.

**Q2.** “There is considerable uncertainty about the extent to which we will still be bound by our current EU obligations relating to air and noise pollution following the UK’s withdrawal from the European Union. Therefore, we are not yet in a position to state precisely what further action we propose to take forward in the second, third, fourth and fifth years of this Assembly.

**“Bearing this uncertainty in mind, along with the information provided on the current state of play in Wales in sections 1 to 5 and Annex A of the consultation document, please tell us what further action, if any, you would like to see taken forward on air and noise pollution in the next five years?”**

We would hope that the Welsh Government’s commitment to tackling air pollution does not depend on being required to meet its current EU obligations, but rather would use EU directives as a starting point upon which to build plans of action.

We are concerned that the air pollution indicator under the remit of the Wellbeing of Future Generations Act exclusively concerns nitrogen oxides. We believe a national indicator is also required for particulate matter (PM) pollution, due to the significant adverse effect PM pollution (in particular PM<sub>2.5</sub>) has on lung health.

We also believe that more needs to be done by Welsh Government to actively monitor daily air pollution levels from a public health perspective. Forecasting by DEFRA and the Met Office means it is possible to prepare for expected high levels of pollution and warn those most susceptible to its effects beforehand, but Public Health Wales and local health boards do not currently routinely do this. Undertaking this activity would help ensure air pollution is viewed as an ongoing public health issue, reduce the risk of avoidable exacerbations for those with chronic obstructive pulmonary disease and other prevalent lung conditions, and therefore potentially reduce hospitalisations.

**Q3.** “We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:”

We would like to welcome recent moves by the Welsh Government to encourage active travel, in particular through the passing of the Active Travel (Wales) Act. Encouraging active travel can in itself help combat air pollution, as well as the other stated health benefits.<sup>3</sup>

We are however concerned that the Act in its current form does not give regard to the safety of active travel routes in terms of air quality. Given that a person’s lungs are more susceptible to the effects of air pollutants during exercise, we would argue that walking and cycling routes should be subject to regular air pollution monitoring and should also be prioritised if a reduction in pollution levels is needed. We also call for an amendment to the Act to ensure air quality is taken into account when creating new active travel routes.

**For further information please contact:**

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<sup>3</sup> *Working together to promote active travel: a briefing for local authorities*, Public Health England (2016).  
<https://www.gov.uk/government/publications/active-travel-a-briefing-for-local-authorities>