



RTPI Cymru

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e-mail response sent to: AirQualityPolicy@gov.wales

Dear Sir/Madam,

Response to: Clean Air Plan for Wales

The Royal Town Planning Institute (RTPI) is the largest professional institute for planners in Europe, representing some 25,000 spatial planners. RTPI Cymru represents the RTPI in Wales, with 1,100 members. The Institute seeks to advance the science and art of planning, working for the long-term common good and well-being of current and future generations. The RTPI develops and shapes policy affecting the built environment, works to raise professional standards and supports members through continuous education, training and development.

This response has been formed drawing on the expertise of the RTPI Cymru Policy and Research Forum which includes a cross section of planning practitioners from the private and public sectors and academia from across Wales.

Our response to the consultation questions is set out below.

RTPI Cymru's response to the consultation questions are set out below. If you require further assistance, please contact RTPI Cymru on 020 7929 8197 or e-mail Roisin Willmott at walespolicy@rtpi.org.uk

Yours sincerely,



Dr Roisin Willmott OBE FRTPi
Director
RTPI Cymru

Section Title	Questions
<p>The Clean Air Plan for Wales - Thematic Approach and Commitments</p>	<p>1. Does the thematic approach in the Clean Air Plan bring together the key air quality issues in a way that is clear and helpful way?</p> <p>We support the thematic approach outlined in the Clean Air Plan but suggest that commitments may need to be prioritised and there needs to be a clear, over-riding commitment to maximising improvements to air quality.</p> <p>The new national air pollution monitoring network needs to establish clear performance indicators against which progress can be measured. The commitments under each theme are wide ranging and it will be important to understand the linkage and interaction between them in terms of working towards improved air quality.</p> <p>It would also help for key agencies and actor responsible for each policy and action to be listed to ensure that there is clear ownership and to support collaboration.</p>
<p>Air pollution and health</p>	<p>2. Do you agree enhancing monitoring and assessment capabilities will help to understand and inform action to reduce the impacts of air pollution on health and well-being in Wales? Please provide evidence in support of your views where possible.</p> <p>3. Do the commitments and actions for health and well-being address the most important factors for improving air quality and realising health benefits?</p> <p>We strongly support the public health focus of the plan and its recognition that improving air quality needs to go beyond compliance with limit thresholds.</p>
<p>Local Air Quality Management (LAQM)</p>	<p>4. Are you satisfied the proposals for Local Air Quality Management will result in robust, effective air quality management arrangements?</p> <p>RTPI Cymru supports the approach to modernising the regime and adopting a public health-driven approach to enhance its outputs and outcomes.</p>

<p>Area-specific policies and the designation of air quality improvement areas/zones.</p>	<p>5. Are you satisfied with the proposed approach for Clean Air Zones/Low Emission Zones in Wales?</p> <p>RTPi Cymru recognises the benefits of Clean Air Zones (CAZ's)/Low Emission Zones in terms of reducing air pollution, but that any revised framework needs to carefully take account of wider social impacts in terms of charging for the use of more polluting vehicles and the displacement of traffic.</p> <p>In considering CAZ's Welsh Government should have regard to their implementation in other parts of the UK where they have been supplemented by significant investment to support vehicle scrappage and retrofitting of the public transport and taxi fleet. Such measures should also be supported by promotional initiatives and other activities to support travel behaviour change.</p> <p>We welcome the recognition of the role that road user charging could play in delivering cleaner air and the commitment in the plan to reviewing this.</p>
<p>Domestic Combustion</p>	<p>6. Do you agree with the proposals for tackling air pollution from domestic combustion?</p> <p>No comment</p> <p>7. Which aspects of Smoke Control would you would like Welsh Government to consider or strengthen?</p> <p>No comment</p>
<p>Integration of area specific policies</p>	<p>8. Are you satisfied with proposals to deliver a more integrated air quality management approach? If no, please provide evidence to support other alternatives.</p> <p>We support these proposals but would highlight the importance of Welsh Government taking a leading role in terms of direction and collaborating with local authorities.</p>
<p>Indoor Air Pollution</p>	<p>9. Are there aspects of indoor air pollution which you would like Welsh Government to address? You may wish to consider what the Welsh Government's top priorities should be for regulating chemicals in articles and products which may contribute to poor indoor air quality.</p> <p>No comment</p>
<p>A Clean Air Act for Wales</p>	<p>10. Do you support the proposals for a Clean Air Act for Wales?</p> <p>11. Are there additional issues a Clean Air Act should address?</p> <p>12. What other legislative or regulatory actions in relation to air quality should we consider to improve</p>

	<p>people's lives and community well-being in a sustainable way?</p> <p>RTPI Cymru supports the proposals for a Clean Air Act and would wish to work closely with Welsh Government and stakeholders to ensure appropriate linkages are made to land use planning policy and mechanisms.</p>
<p>Public awareness about airborne pollution</p>	<p>13. Citizen science projects to date have focused on work with young people. Are there other age groups or communities would you like to see us work with?</p> <p>14. Which age groups do you think would benefit most from greater understanding of air quality, pollutants, evidence and interpretation, and developing personal awareness and responsibility?</p> <p>15. Are there other approaches or opportunities to develop greater understanding of air quality issues that you think we should explore?</p> <p>16. Do the proposed communications work streams provide a suitable focus for air quality communications and behaviour change work?</p> <p>17. Are there features you would like as part of the Air Quality in Wales website?</p> <p>18. Are there specific communications and behaviour change campaigns you would support?</p> <p>19. Are there age groups or communities who could contribute to developing citizen science projects?</p> <p>20. Which age groups would benefit most from developing personal awareness, understanding and responsibility in terms of air quality and pollutants?</p> <p>21. Are there additional approaches or opportunities to develop greater understanding of air quality issues that should be explored?</p> <p>No comment</p>
<p>Improving air quality to protect the health and well-being of current and future generations - commitments and actions</p>	<p>22. Do the proposed commitments and actions address the issues described in the health and well-being section of the Plan?</p> <p>23. Do you agree the actions will help to reduce the impact of air pollution on health and well-being in Wales?</p> <p>24. What additional commitments or actions would you propose?</p> <p>Broadening awareness of air quality issues and encouraging changes in behaviour which contribute to air pollution is challenging and will require a multi-faceted approach involving greater collaboration between key agencies such as those in the health sector, local authorities, academic bodies, third sector and local advocacy groups and covering educational initiatives and information campaigns targeting key actors with a role to play in improving air quality and people across all age groups.</p>

	<p>Raising public awareness and encouraging positive action will require a targeted approach to communications. For example, many local communities are affected by air pollution from traffic and, in particular, the nuisance and harmful effects upon health of the anti-social practice of engine idling. Combatting this practice will require a combination of national messaging and local campaigns which targets individuals as residents of communities but also as motorists and members of school communities. Curriculum-linked activities focussed on the journey to school and encouraging wider active travel is important.</p>
<p>Improving air quality to support our natural environment, ecosystems and biodiversity</p>	<p>25. What sorts of nature based solutions could be promoted to help to reduce human exposure to air pollution?</p> <p>26. How can we speed up the recovery of our biodiversity and ecosystems alongside emission reduction?</p> <p>27. What activities can we emphasise in our environmental growth plan to help tackle air pollution and its impact on ecosystems in Wales?</p> <p>28. Do the proposed commitments and actions address the issues described in natural environment, ecosystems and biodiversity section of the Plan?</p> <p>29. Do you agree the actions will help to reduce the impact of air pollution on natural environment, ecosystems and biodiversity in Wales?</p> <p>30. What additional commitments or actions would you propose?</p> <p>RTPI Cymru agrees with the approach set out in the 'Intelligent tree and hedge planting supporting air quality improvements' section of the document. We think the role of Green Infrastructure in improving air quality should have greater emphasis in particular the role of urban tree planting and vegetation provision in combination with SuDs and innovative solutions such as green walls which assist pollution dispersal and facilitate deposition.</p>
<p>Industrial Air Pollution</p>	<p>31. On which sectors, processes or areas should we focus our action to reduce public exposure to industrial emissions to air pollution?</p> <p>32. Are there any specific legislative changes you think we should consider in order to tackle industrial emissions to air?</p> <p>33. Are there any specific actions or measures with which we can encourage investment by industry to reduce air pollution?</p> <p>34. Are there any novel or emerging approaches to reducing emissions to air from industry that you think we should consider?</p>

	<p>35. Do you think generators used for research and development should be treated differently in terms of emission controls?</p> <p>It is important that planning and permitting processes are fully aligned and addressed in parallel. Natural Resources Wales have an important role to play.</p> <p>There is a need for a cross national supplementary planning guidance for Wales which would integrate land use planning considerations with consideration of the provisions of industrial emissions legislation and controls.</p>
<p>Improving air quality to support a prosperous Wales - commitments and actions</p>	<p>36. Do the proposed commitments and actions address the issues described in the Prosperous Wales section of the Plan?</p> <p>No comment.</p>
<p>The National Infrastructure Commission for Wales</p>	<p>37. Should air quality issues be referenced in the remit of NICW?</p> <p>As planning and investment decisions in respect of infrastructure provision can positively or negatively impact upon air quality, it is essential that air quality be referenced within the remit of the NICW.</p>
<p>Transport</p>	<p>38. Are there other air quality matters relating to transport which Welsh Government should consider or review?</p> <p>We are pleased that the Plan fully recognises the significant proportion of air pollution particularly in urban areas that is created by transport, particularly road transport. It is essential that the new Welsh Transport Strategy, the Welsh Infrastructure Investment Plan (WIIP) and the National Development Framework (NDF) is fully aligned with achieving Welsh Government's commitments to improve air quality and tackle the climate change emergency.</p> <p>Planning Policy Wales Edition 10 represents a significant shift in land use policy in Wales in the way it recognises the central role of active and sustainable modes of travel in creating sustainable places and contributing to the goals of the Well-Being of Future Generations Act.</p> <p>The recent increases in capital funding to local authorities for active travel delivery referenced in Plan are welcomed. This higher level of capital investment needs to be sustained but also supplemented by funding for a range of supporting actions to achieve behaviour change. These range from upskilling transport and planning professionals in infrastructure planning and design through to investment in softer</p>

	<p>promotional and training activities including cycle training, pedestrian training and active travel planning in schools (building on the work of Sustrans and also following the example of Cardiff Council's recently-launched Active Travel Schools programme.)</p> <p>The commitments to improving public transport in the plan needs to be strengthened. Whilst the emphasis is on greening/cleaning the bus fleet is to be welcomed, along with the invitation to local authorities to apply for funding for Green fleet/ electric charging infrastructure under the ULEV grant, it is disappointing to note there is no reference to the great need to improve the number and range of bus services available and service reliability, efficiency and customer experiences which are key to modal shift.</p> <p>While the changes to improve the planning and delivery of bus services which will be included in the forthcoming public transport bill are to be welcomed, the lack of funding to subsidise improved bus services will remain a key challenge.</p> <p>As referenced in our response to the consultation on the Improving Public Transport White Paper in February 2019, Welsh Government currently subsidises every rail journey within the all Wales rail franchise by over £11. This is in contrast to bus passenger journeys which attract funding of only £2.20 per journey. This deficit must be reduced to fully realise the modal shift potential of bus travel.</p>
<p>Improving air quality to support sustainable places – commitments and actions</p>	<p>39. Do the proposed commitments and actions address the issues described in the Plan?</p> <p>40. Do you agree the actions will help to reduce the impact of air pollution to support sustainable places in Wales?</p> <p>41. What additional commitments or actions would you propose?</p> <p>We broadly support the commitments and actions in the plan but would highlight the significant capital investment that will be required for fleet replacement, charging infrastructure, the need to address issues around manufacturing and supply and issues around State Aid rules.</p> <p>In this regard, it would be helpful for Welsh Government to set out a clear pathway towards reaching its target around low emission vehicles and infrastructure</p>
<p>Welsh language</p>	<p>42. We would like to know your views on the effects the <i>Clean Air Plan</i> will have on the Welsh language, specifically on:</p> <p style="padding-left: 40px;">a. opportunities for people to use Welsh; and</p>

	<p>b. treating the Welsh language no less favourably than the English language.</p> <p>43. What effects do you think there would be? How could the positive effects be increased, or negative effects be mitigated?</p> <p>44. Please also explain how you believe the proposed Plan could be formulated or changed so as to have:</p> <ul style="list-style-type: none"> a. positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language b. no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language. <p>No comments</p>
<p>General question</p>	<p>45. We have asked a number of specific questions. If you have any related issues that we have not specifically addressed, please use this space to report them.</p> <p>No further comments</p>