

Deputy Clerk
Petitions Committee
National Assembly for Wales
Cardiff
CF99 1NA



THE ASTHMA UK AND
BRITISH LUNG FOUNDATION
PARTNERSHIP

15 January 2020

Dear Sirs,

We write in reply to the request submitted by the committee for further comments and thoughts on the draft Clean Air Plan for Wales in relation to the petition 'Protecting Children's Lungs from Harmful Pollution whilst at School'.

First, we would like to thank you for the opportunity to provide further comments. Since submission of our petition, recent evidence has emerged highlighting the growing concern that air pollution is having a negative impact on developing lungs.

For children growing up around severe air pollution, they are five times more likely to have poor lung development with a recent [Kings College London](#) report highlighting that in places of the worst levels of air pollution the development of children's lungs can be stunted by as much 13 - 14%. The same report suggests that for those who live within 50 meters of a major road the risk of developing lung cancer increases by up to 10%. Such findings don't only confirm what the concerns that the petition raised but increase the need for action as soon as possible help mitigate if not reduce completely the levels of pollution that our future generations are experiencing today.

Secondly, we broadly welcome the introduction of the new Clean Air Plan for Wales as this now sets the path to urgently address the levels of air pollution and improve overall air quality in Wales.

Air pollution is one of the biggest threats to public health, second only to smoking. At a cost £1bn per year, air pollution is draining our resources, straining our health system and claiming over 2000 lives a year in Wales. Poor air quality has been linked to increases in childhood asthma, dementia, lung and heart disease, mental health and obesity.

The proposed plan commits to several asks raised by the British Lung Foundation (Now Asthma UK and British Lung Foundation Partnership (AUK-BLF)) through the Healthy Air Cymru Group and seeks to enshrine them in a new Clean Air Act, we welcome:

- Enshrining in law new WHO air quality guidelines,
- Reviewing and updating legislative instruments to review air quality strategies every five years,
- Increasing local monitoring by providing statutory duty on local authorities to assess air pollution
- Introducing a White Paper on a new Clean Air Act for Wales.

The plan also has highlighted the need for a public health awareness campaign to promote positive behaviours and a modal shift from the current overreliance on the car to that of local and active transport. With a focus on reviewing legislative instruments around domestic burning and increase regulation to reduce pollution emitted from high polluting sources of fuel such as wet wood and coal.

We highly welcome the proposals set by the plan however we do have some concerns.

Funding at Local Authority Level

We welcome the reforms at a local authority (LA) level which allow LA's to develop and incorporate their plans to new frameworks and reformed timelines. However, with a large focus on reforming laws which govern laws at the local level, there is fears that already financially stretched authorities may not have the sufficient funding to implement the new frameworks to tackle air pollution.

The Public Health Campaign

The plan addresses the need for public health awareness campaigns and that a review of guidance should be completed by 2021. The plan highlights campaign work which is already underway such as Clean Air Day and work being done to promote LA's in their awareness campaigns. However, the pressure and focus is placed at the LA level with only a review of possible future campaign through Public Health Wales and NHS Wales in the immediate future with funding for such campaigns again a concern.

Reducing speed limits to 50mph in the five locations in Wales to reduce NO2 levels is a positive step in reducing the level of emissions emitted at the roadside, however it doesn't deliver on the public health message. Only later after several concerns raised by members of the Assembly, organisations like those who are members of Healthy Air Cymru and members of the public did the Government introduce road signs stating that 'Air pollution kills'.

Whilst the Government states that legislative time may not be permitting to introduce a new Clean Air Act now, to promote the modal shift that has been echoed by this plan, campaign work should begin at a much earlier stage in the plan to deliver behavioural change and begin to reduce the levels of pollution through positive action in Welsh communities.

Exclusion Zones

We welcome the plan's comments in the need to review laws around car idling which pollutes our streets unnecessarily as the car remains idle. However, there is no comments in the plan around School Exclusion Zones.

This would be a zone around a school where parents are encouraged not to drive their car to school and promote instead active travel. This could also be done with a 'park and stride' model ([Living Streets has a toolkit here](#)). Where parents are recommended to park at another location and walk with their children or a group of children in supervision of an adult walk to school instead of driving to the school gates.

Children growing up around severe air pollution are 5 times more likely to have poor lung development. Increases of air pollution from vehicles has been linked to worsening of symptoms of conditions such as asthma, which is common in children.

Recent figures of ONS data have recorded an increase in asthma deaths and diagnosis. 1,400 people have died from an asthma attack in 2018, an 8% increase from 2017 and an increase of 33% compared to a decade ago. With a third more children diagnosed with asthma during the same period.

Sustrans in partnership with 'playing out' are working with local authorities and schools in implementing exclusion zones around schools in Wales. The plan could incorporate such a method to reduce air pollution around schools and legislate to strengthen such indicatives.

WHO Guidelines, will there be another timetable?

The plan sets out the ambition of not only setting WHO guidelines into statutory instruments but for Wales to eventually reduce the air pollution limits below that of the current WHO guidance. This ambitious target is welcomed, however the details are unclear as to when the new Clean Air Act for Wales will bring in compliance to WHO levels.

Will the new Act upon enactment bring about the new WHO compliance from day one of commencement or will there be another phased in timeline of when the guidelines will become Wales' new limits? This is not clear and we would like a more concrete commitment made by Welsh Government and suggest that instead of a White Paper at the end of the legislative term that a Bill is introduced and debated in the Assembly.

The Clean Air White Paper

Our initial concerns are the lack of apparent detail of what will be included in the White Paper which aims to set out the new Clean Air Act for Wales. Because of the nature of the proposed instrument used to introduce the new Act, there is no clear funding plans to accompany the aims and ambitions of this plan.

We would like to instead see a Bill proposed and debated in this legislative term to allow the proper scrutiny of the plans set out in the Clean Air Plan and address our concerns below.

We understand the legislative implications of the current political climate but expresses the need for action quicker rather than later. With the plan highlighting that air pollution contributes to around 20 – 27 people a week dying from poor air quality and the cost to our national health service estimated to be around a billion pounds per year legislative action is needed now.

The plan highlights several avenues and policies to tackle air pollution and the need to work alongside stakeholders. AUK-BLF highlights the need for cross party support with other political matters absorbing legislative time at the Assembly, a Climate Emergency declared, and a public health crisis, now is the time to act.

The Assembly has been recalled early before to debate matters of national importance, we support the proposal for an extra sitting day a week during what is remaining of the legislative term to bring forward and policies and statutory reform set out in this Clean Air Plan.

Concluding Remarks

We need to begin improving air quality for Wales to improve the air that we breathe and to begin to reduce the number of people affected by air pollution. We do not know the long-term implications that air pollution will have to our children's developing lungs, what we do know is that action now can at least limit further damage and prevent future generations' from breathing in poor low-quality air.

Many means to improve air quality are already available to local authorities, what is needed is clear direction and funding. We call upon this Assembly and Government to make such tools and funding available now.

There is no question as to whether air pollution is damaging to our health and we understand that there needs to be an update on several legislative instruments in order to improve air quality in Wales. However, there are questions as to when this plan is going to be fully implemented, of when the funding will be provided, when the new Clean Air Act will be introduced to the Senedd and why there isn't already a public health campaign on air pollution to promote the behavioural change at the local level.

Regards,



Joseph Carter
Head of Devolved Nations
Asthma UK & British Lung Foundation Partnership