



**BRECON AND RADNOR
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Brecon and Radnor Branch Campaign for the Protection of Rural Wales

Response to Welsh Government Consultation: Clean Air Zone Framework for Wales

BRB-CPRW is grateful for the opportunity to respond to this consultation.

We fully support any attempt to control road traffic emissions in order to improve air quality in Wales and believe that encouraging CAZs is a useful, but limited, initiative. We note that CAZs, depend on LPA discretion. The CAZ Framework is a response to a High Court judgement against the WG in the case brought by ClientEarth. We hope it will be successful but since it is not subject to legislation there is no guarantee of the air quality improvements it could theoretically achieve. After this judgement in February 2018, a wider Clean Air Program for Wales – incorporating more than road traffic pollution - was announced for later in 2018. We regard this as urgent.

Clean Air is not just a matter for urban locations where there is heavy road traffic. Air quality is a multifactorial pan-Wales issue. Most of Wales, including all rural areas, are neglected in the fuller text about this initiative which is clearly designed for a few urban areas where control of heavy traffic could improve air quality.

According to the definitions and explanations set out, the CAZ framework should apply to a wider range of situations:

A CAZ is defined as **an area where targeted action is taken to improve air quality**

and also:

“A geographic target area where a range of co-ordinated actions are applied with the purpose of ensuring, in the soonest time possible, a significant reduction in public **and environmental exposure** to harmful airborne pollutants from all sources.”

The Framework sets out a series of requirements for a CAZ including:

- Consider **the full range of sources of air pollution** and environmental noise (not restricted to road use)
- Apply targeted action to **improve air quality and thus health & well-being** of the population
- Aim to reduce **all types** of airborne pollution
- Act against potential increases in pollution arising though....**new development or changes in land use.**

However the text is entirely about traffic control and so the answer to Question 11 of the consultation is an emphatic “**NO**”.

The Framework contains no reference to ammonia. There is currently scientific consensus and a great deal of public concern about levels of ammonia emissions in Wales which are threatening plant biodiversity and residential amenity. Ammonia comes mostly from agricultural sources (88% of UK emissions) and is particularly associated with intensive livestock units which are increasing

at an unprecedented rate in Wales. This applies specially to poultry units. ILUs below NRW permitting thresholds are largely unregulated and are being approved even where background ammonia levels exceed critical thresholds for endangered plant species and animal species depending on them.

Plantlife is launching a report about the risk in Wales on 21st June 2018, **UK CLEAN AIR DAY**, unfortunately just too late for our response to this consultation but **we trust that this will be fully considered by the WG.**

Background ammonia levels in Wales are increasing so that Wales is likely to fail binding EU legislation setting targets for cutting ammonia emissions (8% by 2020 and 16% by 2030).

The Draft Defra Clean Air Strategy 2018 recently announced for consultation seeks to reduce emissions from farming. It is focussed on action in England but says “the United Kingdom has a shared goal to protect our natural heritage” and says it also highlights action being taken in Wales. It cites a number of evidence sources and sets out the role of ammonia in secondary particulate matter which increases exposure everywhere and has negative health impacts. We await effective binding measures to address ammonia pollution in Wales.

Wales urgently needs a comprehensive Clean Air Strategy to tackle the environmental and health hazards of failing air quality standards across the board. Any attempt to improve air quality and reduce transport emissions for the sake of human health and environmental protection is welcome but the voluntary CAZ framework is no substitute for a responsible, comprehensive Clean Air Strategy for Wales.

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