

Y Gymdeithas Feddygol Brydeinig
Pumed Llawr
2 Pentir Caspian
Ffordd Caspian
Bae Caerdydd
Caerdydd
CF10 4DQ

British Medical Association
Fifth Floor
2 Caspian Point
Caspian Way
Cardiff Bay
Cardiff
CF10 4DQ

BMA

Cymru Wales

Air Quality Policy Team
Environment and Communities Division
Welsh Government
Cardiff CF10 3NQ

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The Clean Air Plan for Wales: Healthy Air, Healthy Wales **Consultation response by BMA Cymru Wales**

INTRODUCTION

BMA Cymru Wales is pleased to provide a response to the consultation by the Welsh Government on a draft Clean Air Plan for Wales.

The BMA is a professional association and trade union representing and negotiating on behalf of all doctors and medical students in the UK. It is a leading voice advocating for outstanding health care and a healthy population. It is an association providing members with excellent individual services and support throughout their lives.

At the BMA's Annual Representative Meeting in 2017, a motion was passed calling for greater action to tackle the illegal, lethal levels of air pollution in the UK, which are breaching international standards set by the EU (European Union) and the WHO (World Health Organisation). We have repeatedly called for more decisive action from governments in this area, and we are therefore pleased to see Welsh Government take the lead in this area.

The BMA is a founding member of the UKHACC (UK Health Alliance on Climate Change), which is a coalition of major health institutions committed to increasing awareness and encouraging better approaches to tackling climate change that protect and promote public health, whilst also reducing the burden on health services from the impact of climate change.

Cyfarwyddwr Cenedlaethol (Cymru)/National director (Wales):

Rachel Podolak

Cofrestrwyd yn Gwmni Cyfyngedig trwy Warant. Rhif Cofrestredig: 8848 Lloegr
Swyddfa gofrestredig: BMA House, Tavistock Square, Llundain, WC1H 9JP.
Rhestrwyd yn Undeb Llafur o dan Ddeddf Undebau Llafur a Chysylltiadau Llafur 1974.
Registered as a Company limited by Guarantee. Registered No. 8848 England.
Registered office: BMA House, Tavistock Square, London, WC1H 9JP.
Listed as a Trade Union under the Trade Union and Labour Relations Act 1974.



The impact of air pollution on public health

It has been estimated that the impact on life expectancy from daily exposure to air pollution, when averaged over an adult lifetime, is the equivalent of losing 15 minutes from each dayⁱ. Air pollution is associated with 40,000 premature deaths per year in the UKⁱⁱ. A report by King's College Londonⁱⁱⁱ suggests that living within 50 metres of a major road can increase the risk of developing lung cancer by up to 10% and can stunt the lung growth in children by 13-14% in areas suffering the worst air pollution.

This alarming level of harm is attributable largely to the burning of fossil fuels in cars, lorries and power stations^{iv}. The cost to our health services of treating the health problems associated with this exposure to air pollution adds up to an excess of £20bn per year across the UK^v.

This evidence demonstrates the scale of the challenge ahead and we welcome the plan as an opportunity to set out clearly the Welsh Government's plans in the short, medium and long-term to address the critical impact that air pollution has on public health.

RESPONSE

Structure and timeline of the clean air plan for Wales

The plan is organised according to four themes all centred around improving air quality (protecting the health & wellbeing of future generations; supporting the natural environment; supporting a prosperous Wales; and supporting sustainable places). We believe these themes help to appropriately describe the key areas of focus for change within the plan.

Rather than address each question in turn, we will focus our response on the areas within the draft plan which we think could be strengthened or where further clarity is needed.

- [The clean air white paper](#)

The plan reiterates the First Minister's manifesto commitment to the development of a Clean Air Act for Wales, noting the intention to enhance existing legislation and bring about new legislation to bring about tangible improvements in air quality for current and future generations. The proposed Act would a statutory requirement for a Clean Air Strategy, a reformed regulatory structure for local air quality management, and new nationwide powers for implementing Clean Air and Low Emission Zones.

We consider these proposals extremely noteworthy, but they lack necessary detail at this stage. This detail will understandably follow through the publication of the White Paper prior to the end of this Assembly term, but we are concerned that this timescale would delay much needed action given that the Act, subsequent to the paper's release and consideration, will require the usual cycle of legislative scrutiny. It also poses the risk that proposals are not taken forward by any incoming administration following the 2021 elections, who may have different legislative, or financial priorities. We suggest that the White Paper proposals, when released, are fully costed as to best ensure they

can be feasibly taken forward, and that the White Paper is released as soon as possible for wider consideration.

- [Local authorities and Local air quality management \(LAQM\)](#)

The plan proposes reforms at a local authority level which will allow authorities to develop more proactive plans within new frameworks and according to revised timelines. This is welcome given that the current approach has been in place since 1997 and is in need of revision. We support the ambition to strengthen the local LAQM regime by mandating a time period for reviewing local air quality management strategies. However, there is the risk that local authorities, which are already stretched financially, may struggle to reallocate and invest necessary funding to properly develop and implement the new frameworks. A robust legal framework may help with compliance and prioritisation, thereby helping to emphasise the need for decisive action in this area.

We believe that it is vital that local authorities in Wales are provided with the financial resource to implement any new arrangements as proposed. This should include additional funding for new public engagement approaches and awareness campaigns to promote existing successes and to drive further behaviour change. Urgent action in this area is necessary to deliver the modal shift in public attitudes toward lifestyles that support cleaner air.

The Welsh Government's Air Quality Fund of £20m was announced in April 2018, with the express aim of supporting local authorities to reduce emissions, to operate until 2021. This fund is welcome, but we think it is insufficient to tackle the scale of the problem over the long term. We would welcome confirmation that this fund will continue, and potentially be expanded upon to help finance behaviour change in a wider sense.

- [Transport and infrastructure](#)

We are pleased to see the commitment to update the Welsh transport strategy, setting out the policy framework for achieving decarbonisation targets. Given the huge contribution made by private transport to air pollution, the commitment to move away from private vehicles to low-carbon, clean air methods of transport is welcome. This would reflect the highly publicised commitments towards a South Wales Metro system.

Additionally, we believe that clearer information should be provided to the public about vehicles' emission levels. This will encourage individuals to purchase ultra-low emission vehicles instead of diesel cars but also encourage behaviour change toward active transport. This itself will have major health benefits by helping to reduce obesity, coronary heart disease and reducing road traffic accidents.

BMA Cymru Wales heavily supported the introduction of the Active Travel Act in 2013^{vi}. However, it is disappointing to see that the praiseworthy intentions of the legislation have not been realised. The numbers of people walking and cycling to work and school has not increased in any meaningful way since the Act's passage, with only 5% of people over 16 making at least one 'active travel trip' at least once week in 2016-17.

The Economy, Infrastructure and Skills Committee's post-legislative scrutiny report^{vii} identified that the level of available funding constrained the activity of local authorities and advocated for an increase in the overall recurrent funding for implementation. The proposed capital investment highlighted in the plan is extremely necessary, as similar to our concerns about the changes to the local air quality monitoring regulatory system, appropriate funding must be made available in order for local authorities to deliver.

- [Expanding low emission zones](#)

We welcome the plan's commitments to take forward a new framework for clean air zones/low emissions zones, and to continue reviewing vehicle access restrictions. The plan to review legislation about car idling is also welcome given the increasing knowledge we have about the contributory factor to air pollution. As an illustration, Westminster Council have estimated that an idling car produces enough harmful exhaust emissions to fill 150 balloons a minute^{viii}.

We suggest that this section of the plan could benefit from incorporating a commitment to consider legislation around School Exclusion zones, building on much of the positive schemes being undertaken on a voluntary basis at the moment. Exclusion zones would be situated immediately around schools where parents are encouraged not to park their cars, thereby encouraging active travel to school. This could be aligned with a 'park and stride' model^{ix} where parents are encouraged to park at another location with the children (or a group of children) being supervised by an adult walking to school.

- [World Health Organisation standards](#)

We support the ambition of the plan to introduce into law, via the Clean Air Act, the requirement that concentrations of particulate matter (PM_{2.5}) in Wales are in line with, and eventually below, the guidelines set by the World Health Organisation. This is an ambitious move but a highly necessary one, and fully in keeping with the Welsh Government's declaration of a climate emergency.

However, we would welcome further clarity on timescales, particularly around whether it will be a 'day one' expectation or a phased implementation toward meeting the guidelines. Additionally, it would be beneficial to consider any incentives/disincentives for local authorities that are achieving or failing to achieve these new requirements.

We suggest that the legislation should include a commitment to regularly review air quality targets, as the evidence base around the damaging effect of air pollution continues to expand. This will help to ensure that local authorities and other competent authorities do not fall into a compliance culture and instead are accustomed to a system of regular review requiring improvement.

- [NHS Wales as an exemplar](#)

The section about empowering the workforce of the NHS and other public bodies to tackle air pollution is laudable, and we encourage the principle of collaboration with Public Health clinicians to review the air pollution guidance.

In addition, we feel that the plan should contain an ambition to establish NHS Wales an exemplar organisation for clean air and safe workplaces. This would ensure that those who are most vulnerable to the impacts of air pollution – children, the elderly and infirm – are protected, in addition to the staff who care for them. This could include:

- Environmentally friendly NHS Wales transport – require all NHS Wales vehicles to meet certain criteria for minimising air pollution (e.g. switching from polluting fuels to hybrid/electric vehicles within a specified timeframe), and where feasible minimise the use of any pollution-causing transport options in favour of cleaner alternatives.
- Monitoring air pollution associated with NHS procurement – require Health Boards to report this data, and progress made in reducing their footprint, against their Integrated Medium-Term Plans (IMTPs).
- Energy-efficient – as one of the UK’s most energy-intensive organisations, it should continue to switch to clean energy providers and adopt on-site renewables, where possible.
- Ensuring that all new build developments are well integrated with local transport networks to minimise the need for private transport by patients and staff.

ⁱ Royal College of Physicians (2017) “*What does Brexit mean for air quality?*” Available at: www.rcplondon.ac.uk/projects/outputs/brexit-what-does-it-mean-air-quality

ⁱⁱ Royal College of Physicians & Royal College of Paediatrics and Child Health (2016) “*Every breath we take: the lifelong impact of air pollution*”, p18. Available at www.rcplondon.ac.uk/projects/outputs/every-breath-we-take-lifelong-impact-air-pollution

ⁱⁱⁱ King’s College London “*Living near a busy road can stunt children’s lung growth*” (2019). Available at: www.kcl.ac.uk/news/living-near-a-busy-road-can-stunt-childrens-lung-growth

^{iv} UK Health Alliance on Climate Change (2016) “*A Breath of Fresh Air*” Available at: www.ukhealthalliance.org/report-breath-fresh-air/

^v Royal College of Physicians & Royal College of Paediatrics and Child Health (2016) “*Every breath we take: the lifelong impact of air pollution*”, p79. Available at www.rcplondon.ac.uk/projects/outputs/every-breath-we-take-lifelong-impact-air-pollution

^{vi} BMA Cymru Wales (2013) “*Consultation on Active Travel (Wales) Bill – response*” (2013) Available at: www.bma.org.uk/-/media/files/pdfs/about%20the%20bma/what%20we%20do/lobbying/wales/walesresponseactivetravelbill.pdf?la=en

^{vii} National Assembly for Wales Economy, Infrastructure and Skills Committee (2018) “*Post-legislative scrutiny of the Active Travel (Wales) Act 2013*” Available at www.assembly.wales/laid%20documents/cr-ld11566-r/cr-ld11566-r-e.pdf

^{viii} City of Westminster (2019) “*Don’t Be Idle*” www.westminster.gov.uk/dont-be-idle

^{ix} Living Streets (2019) “*A guide to setting up a Park & Stride scheme*” www.livingstreets.org.uk/media/2035/park-and-stride-print.pdf