

Local Air Quality and Noise Management in Wales

The Natural Gas Vehicles Network (NGV Network) is an established trade body which represents a diverse range of businesses involved in the production of gas-derived fuels and gas-powered vehicles, particularly heavy goods vehicles. Given that air pollution, and related preventable deaths, are at unacceptably high levels, the work of our members is vital in developing the next generation of cleaner transport fuels and vehicles. The NGV Network is one of the six divisions of the Energy and Utilities Alliance (EUA).

Natural gas is readily available as well as being cheaper and less vulnerable to price volatility compared with diesel, the primary fuel used by heavy vehicles such as HGVs, buses, etc. It also performs far better on the most harmful pollutants such as particulates and nitrogen dioxide whilst having the potential to be decarbonised through use of renewable gases such as biomethane.

We welcome the Welsh Government's proposed changes which we believe will make the reporting of local strategies to tackle air pollution more streamlined and focused. This would provide the local framework necessary to facilitate more effective co-operation between the Welsh Government, local authorities, businesses and other interested parties which will be essential to ambitious action on air quality. We have provided more detailed responses to the consultation's proposals below:

6.1. We think these proposed changes will reduce the burden on Local Authorities without reducing the effectiveness of LAQM. Do you agree?

We agree that a single annual report would give a better indication of local authorities' progress in improving air quality whilst making the reporting process simpler for all bodies involved. This would also refocus efforts in this area to an ongoing annual basis as opposed to the primary focus being on three-yearly assessments.

6.2. Do you agree there is scope for some Local Authorities to work more efficiently by producing annual progress reports and/or local air quality strategies jointly?

We agree with this proposal as it is perfectly sensible to allow local authorities to work jointly on progress reports and the actions which arise from them. In fact, we believe this model of working should not only be allowed but should be actively encouraged. Poor air quality is clearly a problem which transcends local government boundaries and often affects neighbouring areas in similar ways; for example, local authorities along the M4 corridor could benefit from working together on reducing emissions associated with motorway traffic whilst councils in the South Wales Valleys will often experience similar issues with emissions from arterial roads settling in the valleys and could therefore share expertise and resources.

A silo mentality in government has been detrimental to improving air quality for decades and so we welcome this proposal to allow local authorities to collaborate on joint strategies that will be mutually beneficial to their residents.

6.3. Do you agree the Welsh Government should enforce deadlines for annual progress reports and local air quality action plans in the manner described?

Yes, we support the Welsh Government's proposals to enforce the deadlines for annual progress reports. These reports should be viewed with the same seriousness as the issues of air quality and related preventable deaths are as they are the tool with which local authorities can take action. Enforcement is therefore necessary but we believe the process should be more stringent than that which is suggested. Half a year should not be allowed to go by without statutory action being taken, therefore we would suggest a warning letter after the report is two months overdue, a final warning letter after three months and a direction from Ministers after four months.

6.5. Do you agree annual progress reports should include air and/or noise pollution figures and average levels of NO₂, PM_{2.5}, PM₁₀ at dwellings?

We do agree with these proposals, particularly the suggestion to mandate the inclusion of NO₂ and particulate figures as they are undoubtedly now among the top targets for addressing air quality issues. Residents and the Welsh Government will need these figures to be included so that they can come to an informed decision as to whether a LAQM plan is robust and effective enough.

6.6. Do you agree local air quality action plans should include how actions are being taken forward not solely with a view to achieving technical compliance with the national air quality objectives, but also with a view to maximising their contribution to reducing average levels of NO₂, PM_{2.5}, PM₁₀ and noise pollution at dwellings across the Local Authority?

Yes, this is also a sensible proposal which will guarantee the best real-world outcomes for residents. In the past, overemphasis on meeting national air quality figures has, in some cases, led to inadequate or poorly planned action being taken in many parts of the UK. In order to properly get to grips with air quality in an ambitious way, it will be necessary for all levels of government to take a holistic approach which considers the impact of decisions on a range of pollutants and particularly the most harmful to health such as NO₂ and particulates.

6.7. Do you agree to our retaining all the existing national air quality objectives but encouraging Local Authorities to focus just on NO₂ and particulate matter?

Yes we agree with this proposal. Although reducing all pollutants would be the most desirable outcome from action taken by local authorities, it is important to acknowledge the financial and resource constraints they face. For this reason, focusing on the most harmful pollutants, namely NO₂ and particulates, is the most pragmatic approach and we welcome the fact that the Welsh Government has identified these pollutants as the priority.

6.8. Do you agree to our introducing the proposed changes through statutory guidance in time for next year's reporting?

If these changes are finalised then the Welsh Government should aim to bring them into force as soon as possible, preferably before the round of 2017 reports are due. This would avoid a year's delay in the implementation of these improvements and allow the new system time to bed in whilst substantial reviews of air quality legislation are ongoing at the national level.