

WELSH GOVERNMENT CONSULTATION

WHITE PAPER - CLEAR AIR (WALES) BILL

Consultation response form

Consultation Response Form

Your name:

Robert Andrew Robinson MBE FRICS

Organisation (if applicable):

North and Mid Wales Association of Local Councils

email / telephone number:

Tel: 01938 811378 or 07767 267830

Your address:

Crown House, High Street,
Llanfair Caereinion, SY21 0QY

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| 1. Do you agree with the proposal to create a requirement within the Bill for a Welsh Clean Air Plan or Strategy to be reviewed and published at least every 5 years? If not, please provide details
The Association supports this proposal. |
| 2. Do you agree with the proposed timescales for the review of the Clean Air Plan or Strategy? If not, please provide detail.
The Association supports the envisaged timescales as long as everything (I guidance etc.) is in place before implementation. |
| 3. Do you agree Welsh Government should introduce a framework to set new air quality targets?
The Association agrees with this proposal. |
| 4. Do you agree with the proposed air quality target setting framework? If not, please provide evidence to support your answer, if available
The Association agrees with this proposal. |
| 5. Do you agree there is a need to clarify and strengthen legislation? If so, do you agree with the approach outlined?
The Association supports this proposal. |
| 6. Do you think a mutually agreed compliance date on a case by case basis will help to achieve air quality improvements in AQMAs, in the soonest possible time? Please provide detail.
Yes, this will allow flexibility and gain more co-operation in achieving the aims and objectives. |
| 7. How can we ensure the 'partners' concept improves and supports collaboration in improving air quality?
By working in partnership more flexibility can be administered and this in turn may gain more co-operation in achieving the aims and objectives. |
| 8. Will these proposals collectively help to deliver a more proactive and prevention focused LAQM regime?
The Association agrees that collectively it may help to deliver what is required. |

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9. Do you think the proposals would support the efficient and effective roll-out of Clean Air Zones / Low Emission Zones in Wales? Yes in principle. The simpler everything is the more likelihood there is that a result will be achieved.
10. Do you believe revenue raised through trunk road charges should be available for purposes other than to support local transport policies (please specify)? Any charging in trunk roads should be deferred until the number of electric vehicles on the road has substantially increased. There are many vehicles which are diesel and the cost of replacement with electric over the short to medium term is great. It should be remembered that government encouraged the use of diesel vehicles a few years ago. The Association does not support charges on trunk roads for the foreseeable future except in cities or towns which show a case for it.
11. Do you agree with the proposals relating to tackling engine idling? The Association supports this proposal.
12. What do you think are the advantages/disadvantages of the proposals? The advantages are a reduction in emissions however enforcement may be difficult.
13. Can you suggest any additional approaches to tackle engine idling? No.
14. Do you have any evidence to present on the links between emissions and exposure in respect of idling? No.
15. Do you agree with the proposal to transpose Part 3 of the Clean Air Act 1993 (Smoke Control) into Welsh legislation? The Association supports this proposal.
16. Are there any other aspects of the Clean Air Act which you would consider appropriate for inclusion within Welsh legislation? No. The Association is appreciative of the proposals regarding bonfires in gardens. There are many homes that have no alternative; however the banning of burning wet wood is accepted.
17. Do you agree changing the enforcement regime from criminal to civil action will assist in improving enforcement? The Association agrees with this proposal.
18. Would you agree in light of the evidence there should be a presumption in favour of Smoke Control, at a minimum in urban areas? The Association supports this proposal for urban areas, not rural locations.
19. Do you agree with the proposals? Yes.
20. What are the advantages/disadvantages of the proposals? The recording of information will allow the government to make informed decisions.
21. In what other ways or by whom could the guidance be delivered? Please provide detail. Guidance should be from a single source (i.e. Welsh Government Web Site). Multiple sources will create confusion.
22. What would be best way(s) for stakeholders to report progress to the Welsh Government? There are many current reporting procedures in place for many regulatory functions. It is suggested it should be a simple online form for completion every 6 months.

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23. Do you have any additional points to make?	One of the main tourist attractions in Wales are its steam railways. Without the use of fossil fuels these attractions would not exist. There should be an exclusion for all heritage railways however they should seek to keep emissions to a minimum without defining what is minimum.
24. We would like to know your views on the effects these provisions would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English.	The Association supports equality with the Welsh Language; however it does not see its relevance to this consultation.
25. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?	The Association supports equality with the Welsh Language; however it does not see its relevance to this consultation.
26. Please also explain how you believe the proposed provisions could be formulated or changed to have positive 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.	The Association supports equality with the Welsh Language; however it does not see its relevance to this consultation.

Responses to consultations are likely to be made public, on the internet or in a report. If you would prefer your response to remain anonymous, please tick here: ☐

January 2021