



Welsh Government
Consultation – summary of response

Tackling Roadside Nitrogen Dioxide Concentrations in Wales

Welsh Government interim supplemental plan to the UK plan for tackling roadside nitrogen dioxide concentrations 2017

July 2018

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1. Introduction

- 1.1. Tackling poor air quality is a priority for the Welsh Government and this is reflected in the National Strategy 'Prosperity for All'.
- 1.2. The Welsh Government is working alongside the other devolved administrations to meet their joint objective with the UK Government to transform the UK's most polluted towns and cities into clean and healthy urban spaces, supporting those most directly affected and ensuring the vehicle manufacturers play their part to improve the nation's air quality.
- 1.3. The Welsh Ministers accept the 2017 Plan does not, insofar as it relates to Wales, satisfy the requirements of the Ambient Air Quality Directive or the Air Quality Standards (Wales) Regulations 2010. This is because the Welsh Government did not, at the time when the 2017 Plan was drawn up, have sufficient information to properly consider what measures within their devolved competence (if any) would ensure compliance with the limit values for NO₂ laid down by the Directive and the Regulations within the shortest possible time.
- 1.4. The Welsh Ministers have given a court undertaking to publish and commence consultation on a draft supplement to the 2017 Plan which satisfies the requirements of the Directive and the Regulations, by 30 April 2018, following a judicial review of the 2017 Plan decided earlier this year.
- 1.5. This consultation was launched on the 25th April 2018 seeking views on the Welsh Government supplemental plan to the 'UK plan for tackling roadside nitrogen dioxide concentrations 2017 ("the 2017 Plan")'. The Welsh Government supplemental plan ("WGSP") builds on Section 7.6 (Additional Actions in Wales) of the 2017 Plan and sets out actions the Welsh Government will take to ensure compliance within the shortest possible time with the limit values for nitrogen dioxide (NO₂) laid down by the Ambient Air Quality Directive (2008/50/EC) and the Air Quality Standards (Wales) Regulations 2010.
- 1.6. The consultation consisted of 4 specific questions concerning the proposed actions in the 4 different zones and agglomerations.
- 1.7. Further questions invited respondents to say whether they felt that the proposals could have any positive or negative impact on the Welsh language, and also invited respondents to offer any additional comments that weren't covered by the other specific questions.

2. Summary of consultation responses

- 2.1. In total, the Welsh Government received 35 responses from a range of stakeholders from various sectors, including members of the public, commercial entities, non-governmental organisations, registered charities, and public bodies. One response was subsequently withdrawn.
- 2.2. Not all respondents commented on every question in the consultation document, and some respondents did not clearly express whether they agreed or disagreed with measures proposed within the WGSP. Every effort has been made to interpret and include the respondent's intended viewpoint within the consultation analysis.
- 2.3. The summary in the following sections is presented by question and draws out similarity of views, suggestions, constructive criticism and useful points made.

Respondents breakdown by type



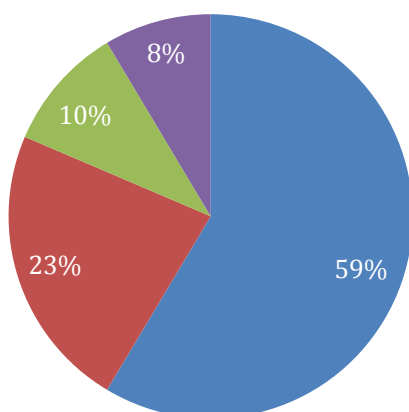
3. Can the measures proposed within the WGSP deliver compliance with statutory limit values for NO₂ in the Swansea Urban Area within the shortest time possible?

- 3.1. In the Swansea Urban Area, the limit value is exceeded on a total of 2.7 km of road, on the M4 between junctions 41 and 42 (Port Talbot). The current projection is that the limit value will be met in Swansea in 2020
- 3.2. The majority of respondents (61%) did not specifically state an answer to this question. Of those respondents who did, 3 agreed whilst 7 disagreed.
- 3.3. The proposed speed restrictions were criticised by numerous respondents. One respondent suggested that there isn't definitive data to support that reduced speed limits would deliver the desired reductions. Another felt that speed restrictions would increase the risk to drivers of breaching the limit, and consequent speeding convictions, for no useful purpose.
- 3.4. The importance of encouraging driving of vehicles at their most efficient speeds was suggested.
- 3.5. It was suggested that any restrictions should only operate on a part-time basis. A variable limit was suggested by another respondent as a potential way of controlling flow and reducing congestion - higher speeds could be reinstated when air pollution levels were lower.
- 3.6. The importance of ensuring a smooth flow of traffic was recognised by several respondents. It was suggested that this could be assisted by profiling traffic signal cycles and a redesign of bottle necks.
- 3.7. Another respondent suggested that it was poor road design that was causing stationary traffic around J40 and J41 of the M4 - traffic flow was improved when J41 was temporarily closed.
- 3.8. One respondent felt that the process outlined in the plan does not appear to speed the timeframe for compliance.
- 3.9. The supporting evidence base to demonstrate that measures would be successful was challenged by some who felt that there wasn't enough data/research to show that these will make a difference. It was also raised that the measures identified in the plan only reflect 'possible' reductions, and further assessment of the likely impact was needed.

- 3.10. The actual sources of the pollution were also questioned and there was an appeal for an improved evidence base to identify these. Manufacturing and industrial emissions may be greater than that from road transport. This was supported by another respondent, who felt that there was no evidence that traffic was causing the pollution problem in the area.
- 3.11. Concern was also expressed by some respondents that modelled data was not wholly reliable, and contradicts actual monitoring. Automatic monitors installed at the sites of exceedance would improve data accuracy. It was outlined by another respondent that there is limited use of local monitoring data in Swansea, only the Automatic and Rural Network (AURN) site, and it was added that confirmation that other sites have been used in model verification would be useful. It was felt that there should be a proportionate approach to assessment given that the modelled exceedance for Swansea agglomeration does not represent annual mean exposure for the annual mean concentration objective
- 3.12. Electric vehicles (EV's) featured in a small number of responses. It was suggested that pure EV's should be exempt from speed restrictions, and that new charging infrastructure must offer contactless payment. It was further suggested that EV chargers with 3kw capacity are insufficient.
- 3.13. Improvements in the emissions of newer vehicles were referenced, with the suggestion that, as vehicles are in the process of becoming cleaner, action isn't really required.
- 3.14. There was some recognition of the value of encouraging modal shift to public transport alternatives. Improvements to provision giving access to major areas would be beneficial. Promoting alternative travel was also referenced in another response. Modal shift to two wheels was another suggestion (motorcycles/mopeds) for inclusion in the plan.
- 3.15. Other potential measures suggested by respondents included air quality announcements on signs, better traffic control at junctions, and fencing/screening.

Consultation responses

■ Yes ■ No ■ Unclear ■ Not stated



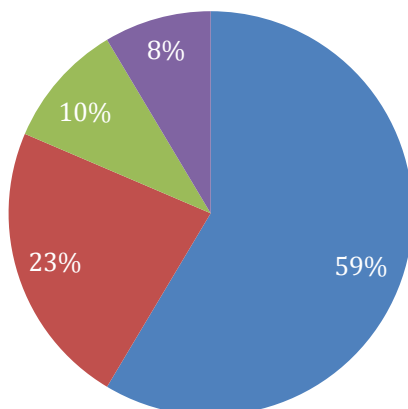
4. Can the measures proposed within the WGSP deliver compliance with statutory limit values for NO₂ in the Cardiff Urban Area within the shortest time possible?

- 4.1. In Cardiff Urban Area, the limit value is exceeded on a total of 16.3 km of road, on the A4161, the A4232, the A4234, the A470 and the A48. The A48, which extends out of the Cardiff Urban Area agglomeration zone and into the South Wales non-agglomeration zone, is not projected to achieve compliance until 2023 without further measures. However, the current projection is that the limit value will be met in the Cardiff urban area agglomeration zone itself in 2021.
- 4.2. The majority (59%) of respondents did not provide a specific view as to whether the proposed measures would deliver compliance, and the answers were unclear about this point in 20% of the responses. Of those who did directly answer this question, two answered yes, and five answered no.
- 4.3. A perceived lack of firm measures was criticised by one respondent
- 4.4. Cardiff was noted as being the only authority tasked with developing solutions. It was added that this should be done in conjunction with neighbouring authorities. It was also raised that the timescales for completing the feasibility study were extremely challenging. More detailed guidance, it was felt, should be provided to support the legal direction on the local authority. The question of funding was also raised, with a suggestion that the necessary budget should be provided to the local authority to enable rapid completion of their feasibility study and final measures.
- 4.5. One respondent questioned the purpose of the plan when it is already known that compliance could be achieved with a Clean Air Zone (CAZ). Also related to CAZ's, concern was expressed by one respondent that a compliance date of 2021 (with the possibility of a CAZ) would be very difficult for those operating light goods vehicles (LGVs) to meet. It was suggested that Cardiff should be directed to introduce a CAZ immediately, or at least if an alternative cannot be found to address air quality issues in the same time period. Although, at least one respondent supported the principle of a CAZ, it was suggested that local authorities should use an evidence-based approach which targets the most polluting vehicles doing the most miles in the most polluted areas.
- 4.6. As with question 1, uncertainty around the actual baseline, due to apparent contradictions between actual readings and modelled predictions, means difficulty arises in deciding which measures will be effective. A more comprehensive monitoring network was again called for.

- 4.7. The Pollution Climate Mapping (PCM) projections were directly challenged a respondent, who called for the plan to be amended to reflect that only the A48 is modelled to be non-compliant. They also felt there was some contradiction around when Cardiff would become compliant, and under what circumstances.
- 4.8. In terms of the assessment of measures, it was felt to be vital, by one respondent, that this was robust, transparent, and evidenced to a high standard, including full economic assessment, to ensure that identified options would achieve compliance.
- 4.9. National measures, it was commented, would support local interventions, and could include a targeted scrappage scheme, investment in public transport, retrofitting grants, a clean vehicle labelling scheme, and incentives and infrastructure to support the take-up of electric and hybrid vehicles.
- 4.10. EV's were again mentioned and a suggestion was made that pure EV's should be exempt from speed restrictions. New charging infrastructure should also offer contactless payment. Chargers with 3kw capacity were felt to be insufficient.
- 4.11. One respondent added there needs to be a speed-up in the transfer to alternative fuels for industry and not just cars.
- 4.12. As vehicles were in the process of becoming cleaner over time, one respondent again stated that action wasn't required.
- 4.13. Ensuring a free-flow of traffic was also again raised, and it was felt that efforts should be directed to achieving this by profiling traffic signal cycles and a redesign of bottle necks.
- 4.14. One respondent believed that stationary traffic created the worst pollution, and that the plan would be more effective if it enabled free-flowing, speed-restricted traffic.
- 4.15. In terms of speed reductions, one respondent suggested that these should be determined by traffic and weather conditions.
- 4.16. Modal-shift was again mentioned and it was felt that this was the most likely way to reduce emissions.
- 4.17. Other sources of pollution that needed to be tackled were identified, including domestic and commercial gas usage.

Consultation responses

■ Yes ■ No ■ Unclear ■ Not stated



5. Can the measures proposed within the WGSP deliver compliance with statutory limit values for NO₂ in the South Wales non-agglomeration zone within the shortest time possible?

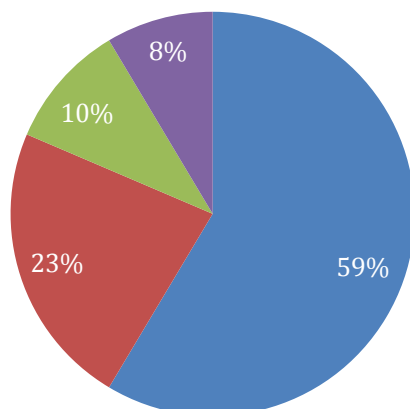
- 5.1. In South Wales, the limit value is exceeded on a total of 15.1 km of road, on the A48 near Cardiff, on the A472 near Hafod-yr-ynys, on the M4 between Junctions 41 and 42 (Port Talbot) and between Junctions 25 and 26 (Newport), and on the A470 between Upper Boat and Pontypridd (there are additional short stretches of road which are the responsibility of Cardiff City Council but, owing to the location of the zone boundaries, fall within the South Wales zone rather than the Cardiff Urban Area). The current projection is that the limit value will be met in South Wales in 2026.
- 5.2. 59% of respondents did not provide a definitive answer to this question. Three agreed and seven disagreed, with the answers given by four respondents not providing a clear view as to whether the measures would or would not deliver compliance.
- 5.3. It was felt that the plan fails to commit to any urgent action on roads managed by Caerphilly Council.
- 5.4. It was asked by one respondent why we are Directing Caerphilly when a decision on likely measures cannot be undertaken until the existing monitor is re-sited. Another advised that the siting of the monitor at Hafod-yr-Ynys has not been raised as an issue in terms of data reliability despite regular audits. The monitor should remain in its current location even if a new monitor is added elsewhere. The monitor issue should also be resolved imminently, it was suggested, and this section removed from the plan.
- 5.5. The 50mph speed restriction at Pontypridd was commented on – as projected emissions concentrations are 39 ug/m³, then it was felt that there was a need for more long-term measures.
- 5.6. The lack of a technical report left one respondent concerned that speed limits on the A470 might lead to an increase in traffic along other southbound routes, potentially exacerbating problems in the Caerphilly town Air Quality Management Area (AQMA).
- 5.7. One respondent suggested speed limits should be determined by traffic and weather conditions. Another respondent commented that emissions will not be decreased in diesel cars as a result of the speed restrictions as they need to operate at 2,000 revolutions per minute (rpm+) for the Diesel Particulate Filter (DPF) filter to regenerate.

- 5.8. The appropriateness of a blanket reduction to 50 miles per hour (mph) between Junctions 41 and 42 of the M4 was challenged – a variable limit could control flow and reduce congestion. Higher speeds could be reinstated when air pollution levels were lower. One respondent believed that additional benefits could accrue from the extended application of the 50mph limit to the length of A470 above Pontypridd abutting Cilfynydd AQMA.
- 5.9. There was a call for further information on fleet composition to support a transition to Ultra Low Emission Vehicle's (ULEV's).
- 5.10. The call was again made for pure electric vehicles to be exempt from speed restrictions, for new charging infrastructure to offer contactless payment, and noted that chargers with 3 kilowatt (kw) capacity were insufficient. It was also highlighted, there needs to be a speed-up in the transfer to alternative fuels, for industry and not just cars.
- 5.11. The timing of the plan was raised, and it was felt that it would be more beneficial if the plan was produced after the outcome of the Caerphilly feasibility study.
- 5.12. More detailed guidance to support the legal direction on the local authority was called for. It was also requested by one respondent that sufficient funding be provided to the local authority to enable rapid completion of their feasibility study and final measures.
- 5.13. A requirement for both local and national measures was proposed. It was felt there is too much focus on local measures and not enough on the potential contribution of national measures.
- 5.14. It was commented that no information had been provided to explain why the monitor at Hafod-yr-Ynys should be relocated. The report that recommended the re-siting should be made public. It was further added that automatic monitors should be installed at the sites of exceedance to improve data accuracy.
- 5.15. In terms of the strength of the measures listed on the plan, it was commented that these only reflect 'possible' reductions, and further assessment of the likely impact was needed. One respondent stated the planned measures would offer some respite only.
- 5.16. One respondent said there has been no consideration of adverse affects to family life from increased travel time.
- 5.17. With further reference to the supporting data, it was commented that there is no data to indicate where people are travelling from and to. Furthermore, the Welsh Government should invest in job creation closer to where people live.
- 5.18. Public transport alternatives were felt to be overcrowded, expensive, and impractical for many.

- 5.19. Efforts should be directed at ensuring a free-flow of traffic by profiling traffic signal cycles and a redesign of bottle necks.
- 5.20. The plan should address the need to improve flow and eliminate stationary traffic. Other measures referenced included air quality announcements on signs, better traffic control at junctions, fencing and screening, and promoting alternative travel.
- 5.21. Concern was noted that measures adopted along the A470 could result in traffic displacement to neighbouring roads, potentially to the detriment of existing AQMA's.
- 5.22. Early engagement and consultation with the local authority was felt to be important, with the potential for collaborative working this could bring, and shared benefits. Engagement on any monitoring proposals could also avoid duplication.
- 5.23. Measures along the A470 to support noise reduction would also be encouraged.

Consultation responses

■ Yes ■ No ■ Unclear ■ Not stated



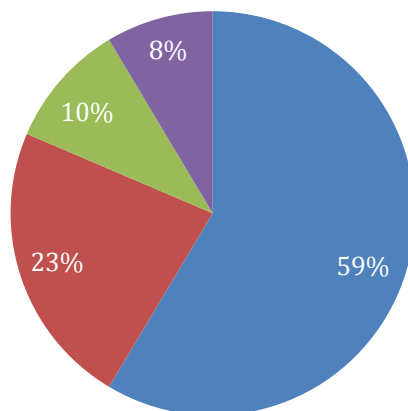
6. Can the measures proposed within the WGSP deliver compliance with our statutory limit values for NO₂ in the North Wales non-agglomeration zone within the shortest time possible?

- 6.1. In North Wales, the limit value is exceeded on a total of 7.7 km of road, on the A494 at Deeside and the A483 near Wrexham. The current projection is that the limit value will be met in North Wales in 2021.
- 6.2. Nine respondents answered that the proposed measures would not achieve compliance, whilst three believed that they would. A large number (62%) gave no direct answer, and one respondent's answer was unclear.
- 6.3. There was a call from one respondent to implement the same measures at all sites including the A494. Another respondent felt that the proposed measures would not address congestion on the roads around the A494/Deeside corridor. It was added that the creation of the new 'red route' and changes to the drone interchange before the bridge, will help. Furthermore, planning departments need to be aware that approving further housing developments will make traffic congestion worse. Recommendations should include better/cleaner buses, a third lane at Aston Hill for heavy goods vehicles (HGV's), better enforcement against foreign HGV's turning off safety emission systems, better signage advising of traffic jams, improvements to the St David's roundabout.
- 6.4. The lack of monitoring in this region, and unique geographical conditions, was identified as a barrier to the assessment of whether the proposals could achieve compliance. Measurements, it was suggested, have not been properly undertaken, and there is no evidence that existing data is within the correct parameters. It was commented that automatic monitors should be installed at the sites of exceedance to improve data accuracy.
- 6.5. The distinction between local and national measures was again raised. It was commented that the proposals for the trunk road network were limited in scope to the vicinity of the exceedances only, and the plan was overwhelmingly focused on local-level measures.
- 6.6. Restrictions along a 1.5-mile length of busy road were felt to be insufficient to combat NO₂ exceedances in Wrexham let in the rest of North Wales. The large industrial estate at Wrexham, and emissions from Kronospan, will also be having an impact.
- 6.7. EV's were again mentioned, and the call for pure EV's to be exempt from speed restrictions. New charging infrastructure must offer contactless payment. Chargers with 3kw capacity are insufficient.

- 6.8. A need to speed-up the transfer to alternative fuels, for industry and not just cars, was cited.
- 6.9. Efforts should be directed; it was suggested, at ensuring a free-flow of traffic by profiling traffic signal cycles and a redesign of bottle necks.
- 6.10. One respondent supported the speed restrictions and suggested that this was the most effective method of reducing emissions. Another added, again, that speed limits should be determined by traffic and weather conditions. The appropriateness of a blanket reduction to 50mph on the A494 and A483 was challenged – a variable limit could control flow and reduce congestion. Higher speeds could be reinstated when air pollution levels were lower.
- 6.11. A quite detailed response was provided by one respondent who felt that the speed reduction to 50mph appears to be based on conjecture and would have little effect. The basis for determining exceedance is focused on a single monitor at Rhostyllen roundabout, which, although under the limit, is adjusted. A monitor should be placed at this location instead to determine the actual air pollution levels. The data for traffic flows is flawed as it is based on an average when traffic flows vary across different days and times of the year. The report suggests that compliance would, in any case, be achieved by 2018. HGV's are the biggest problem and they are speed-restricted already so will be little affected. Charging infrastructure needs to be installed to encourage take-up. More investment for cycle lanes and loans for electric bikes are needed. Funding is also needed for bus routes and low-emission buses. Additional train stations are needed to provide an alternative. Tractors and JCB's should be banned at peak times due to the congestion they cause. Roadside checks must be made to uncover the use of HGV cheat devices. A filter lane for Junction 4 of A483 with A525 would help. A new bus or cycle route along the old rail track bed from Monerpenny access road would help. The fleet needs to be converted to electric. Modal-shift needs to be encouraged.
- 6.12. Behaviour change to encourage active travel was believed to be important.
- 6.13. Other measures such as air quality announcements on signs, better traffic control at junctions, fencing and screening, and promoting alternative travel would also be welcomed.

Consultation responses

■ Yes ■ No ■ Unclear ■ Not stated



7. Potential impact of the measures proposed within the WGSP on the Welsh language, and any further comments.

- 7.1. The question on potential impact on the Welsh language generated little response, and no respondents identified any adverse impacts. There was a recognition that signage would need to be bilingual. A comment was made by one respondent about the additional expense that this would attract.
- 7.2. The majority of respondents (65%), however, took the opportunity to provide further comments about the general proposals.
- 7.3. Noted was that the Welsh Government must be able to demonstrate the effectiveness of measures instituted on strategic road network and assessment of further measures to bring about compliance. Also, the plan misinterpreted the second limb of the legal test set out in ClientEarth (No.2), and doesn't reflect the need to reduce exposure whilst the final objective is being achieved – this has been omitted from the Welsh Transport Appraisal Guidance (WelTAG) assessment and also the local authority directions.
- 7.4. It was suggested that the plan does not include any actual measures. A lack of sufficient information in the plan was cited as a barrier to making an informed judgement on suitable measures.
- 7.5. One respondent believed the Welsh Government was not moving fast enough.
- 7.6. One respondent called for a “properly funded public transport system that is so attractive and well priced that people will choose to use it rather than pay hefty premiums to drive”.
- 7.7. Disappointment was raised that the plan did not cover the need to reduce overall traffic levels and encourage behaviour-change. There's a need, it was suggested, for long-term sustainable transport solutions. Shared mobility would also help reduce car ownership, along with dedicated parking policies. Autonomous vehicles will also have a part to play. It was raised that proposed measures should accommodate multi-modal options including car club and car hire as an alternative to the ownership of private vehicles. A mobility scrappage scheme for older vehicles, providing a prepaid travel card for bus, rail, car hire, car club and bike share, would be beneficial.
- 7.8. A respondent believed that 50mph speed restrictions would not make any difference, another that the speed limits could actually have an adverse effect on air quality. The issue of being prevented from engaging 6th gear due to 50mph limit was raised as leading to less engine efficiency. There was a call to educate the public in 'ECONOMY driving'.

- 7.9. Emissions will not be decreased in diesel cars, it was suggested, as they need to operate at 2,000rpm+ for the DPF filter to regenerate. HGV's are restricted to 56mph, so it will become impossible to overtake them within a 50mph restriction area, leading to dangerous situations arising from the frustration of other drivers. The evidence to support speed limit reductions was felt by some to be fake/biased/unreliable.
- 7.10. Any congestion charges, it was felt by one respondent, would make pollution worse, as per a recent (unattributed) study of the charge in London.
- 7.11. The timetabling for the final plan, it was suggested, does not correspond with that for the measures on the strategic road network. The requirement for the route to compliance to reduce exposure as quickly as possible has not been fully addressed.
- 7.12. There was a call for the plan to be better linked to other policy areas, and other Frameworks should be considered in conjunction with WelTAG.
- 7.13. A better focus on public health was also called for, with consideration also being given to particulate matter (PM). The public should be better informed about the health risks of air pollution, and influenced to bring about behaviour change. It was felt by one respondent that the plan appropriately acknowledges the health impacts of poor air on people and the environment.
- 7.14. The focus on NO₂ was challenged - the danger of this approach has already been evidenced (CO₂). It was noted that the plan does not acknowledge the need to take account of other sources of air pollution and areas where pollutant levels may not be over EU limits but still need addressing. It was suggested, focusing on NO₂ emissions only is flawed and a plan for action on the range of pollutants should be produced.
- 7.15. World Health Organisation standards were raised and it was suggested that these should be used to determine where action should be taken.
- 7.16. The plan should consider other areas with persistent levels of air pollution, and not just where the exceedances are locally. It was raised that concentrating on individual areas like this will not help tackle the problems elsewhere in Wales. The plan treats each element in isolation and does not reflect the need for partner working or the potential consequences for one area following the introduction of measures in another.
- 7.17. On the issue of EV's, several respondents called for a network of rapid charging points. These should have parking enforcement including fines for non-electric vehicle use. Some chargers should be dedicated to EV's and unavailable for hybrid vehicles. Charging points need improved signage, clearer directions, and canopies.
- 7.18. The value of consumer incentives to encourage cleaner technologies was noted. Policy levers should be applied to assist with transition to cleaner transport forms.

- 7.19. Although the plan references work with other devolved administrations to ensure vehicle manufacturers play their part to improve air quality, it was raised there is no actual detail on this. No information is provided on links to other initiatives such as that on electric vehicles – joint working with the Regional Transport Authority to improve charging infrastructure should be acknowledged.
- 7.20. There were further calls for more information to identify exactly which vehicle types were making the greatest contribution to poor air. One respondent noted that data currently does not differentiate private cars from private hire vehicles (PHVs).
- 7.21. Road charging was considered, by one respondent, to drive positive health benefits through a reduction in traffic volume.
- 7.22. One respondent was concerned that, should a charging CAZ be introduced, then costs should be proportionate. Charges could particularly affect self-employed drivers. Long notice of a proposed CAZ should be provided.
- 7.23. A targeted scrappage scheme could help those with specialist light goods vehicles (LGV's).
- 7.24. It was noted that benefits could be derived from technological solutions that can greatly reduce NO₂.
- 7.25. The need to achieve compliance 'in the shortest time possible' was felt to be too vague and a timeframe should be set alongside more long-term goals.
- 7.26. In terms of targeting areas of identified exceedance through modelling, it was felt, by a respondent, to be nonsensical that known breaches in AQMA's were being ignored in the plan. Only AURN monitors were providing the basis for determining the areas where action must be taken. The respondent called for AQMA's to also be addressed in the plan. Many AQMA's have automatic monitoring stations – why can't these be used to increase model accuracy/reliability? It is factually incorrect to say that the NO₂ limit is only exceeded at Cardiff, Caerphilly, and at 5 other locations.
- 7.27. In terms of budgets, it was raised that any further Direction requiring the undertaking of further measures will have to be funded. Clarity was required as to how the £20m Air Quality Fund is to be allocated. A commitment to increasing this fund should be made, and support for improvements under the Local Air Quality Management (LAQM) regime funded.
- 7.28. The very short timescales for the local authority directions conflict with procurement timescales meaning that bringing about the chosen measures within 1 year would seem unachievable. It was asked what sanctions could follow failure to achieve this?

- 7.29. One respondent noted the plan should reflect the need to reduce overall traffic levels as per the CAZ Framework, and encourage modal shift, putting it into the broader, ongoing, more holistic process.
- 7.30. The need for collaboration between authorities and key stakeholders should be noted, as the issues cross boundaries.
- 7.31. It was raised that the plan is overwhelmingly focused on local-level measures predominantly delivered by local authorities despite responsibility ultimately resting with Welsh Ministers.
- 7.32. Again mentioned was that the worst areas should be directed to introduce charging CAZ's.
- 7.33. Monitoring across Wales needs to be robust and data published regularly.
- 7.34. There was a call for legislation to ensure departments across Government develop policies that are in line with reducing harmful pollutants.
- 7.35. One response questioned the purpose of the consultation as the measures have already been or were in the process of being chosen.
- 7.36. It has not been considered, one respondent stated, whether measures may only be required at certain times of day.
- 7.37. It was asked by another respondent why the plan does not require stronger measures against aircraft, shipping and also wood-burning stoves?
- 7.38. There was a call for the benefits of motorcycle/moped travel to be referenced in the plan.

8. Next steps

- 8.1. The Welsh Government would like to thank those that responded to the consultation.
- 8.2. The responses made have been carefully analysed and considered in the development of the final WGSP.
- 8.3. The responses will also be used (where appropriate) in the WelTAG Stage 3 work which is due to be completed by September 2018.
- 8.4. The advice received will also be considered in the context of the feasibility study process being undertaken by Caerphilly County Borough Council and Cardiff Council, and will be further referred to in the development of our proposals for a Clean Air Plan for Wales next year.

9. List of respondents

David White	n/a
Mrs G Brine	n/a
Phil Coates	n/a
Rhys Taylor	Healthy Air Cymru
Rosaleen Doyle	Royal College of Physicians
Sarah Jones	Public Health Wales
Tanya Sinclair	London Electric Vehicle Company
Sukky Choongh-Campbell	Society of Motor Manufacturers & Traders Ltd
(anonymised)	(anonymised)
Rodney Berman	British Motorcycle Association Cymru Wales
Jason Bale	Cardiff Council & Shared Regulatory Services
Ceri Edwards	Caerphilly County Borough Council
Cheryl Owen	Cardiff Council Transport Policy
Katie Nield	ClientEarth
Emma Henwood	British Heart Foundation
James Lancaster	Enterprise Holdings
Steve Williams	n/a
(anonymised)	(anonymised)
(anonymised)	(anonymised)
(anonymised)	(anonymised)
(anonymised)	(anonymised)
Graham Connolly	Member of the common sense party
(anonymised)	(anonymised)
(anonymised)	(anonymised)
(anonymised)	(anonymised)
(anonymised)	(anonymised)
(anonymised)	(anonymised)
Nicholas Lyes	RAC Motoring Services
(anonymised)	(anonymised)
Neil Pilliner	Rhondda Cynon Taf County Borough Council Public Health & Protection
(anonymised)	(anonymised)
Steev Lewis	n/a
Tom Price	Swansea Council Pollution Control
Lembit Opik	Motorcycle Association Group