

Supporting the Clean Air Bill for Wales
Regulatory Impact Assessment and Air
Quality Monitoring Network Design

Draft RIA: Support to the Clean Air White
Paper

Contents

Introduction	3
Options, costs and benefits	3
Air Quality Target Setting Framework.....	5
Local Air Quality Management (LAQM).....	9
Consolidated Powers for Road User Charging	12
Smoke Control	16
Anti-idling legislation	18
Producing new inter-sectoral guidance to empower workforces to tackle air pollution	20
The likely impact on our Communities, Economy and Environment	22

Introduction

This Draft Regulatory Impact Assessment (RIA) analyses the impacts, costs and benefits of proposals set out in the Clean Air Wales White Paper. The proposals include changes to enhance the legislative framework for air quality including:

- A requirement for a Clean Air Plan or Strategy to be reviewed at least every 5 years.
- Powers to set air quality targets, including for PM_{2.5}.
- Clarified and enhanced Local Air Quality Management Regime (LAQM).
- Consolidated powers to implement Clean Air Zones or Low Emission Zones.
- Strengthened powers to address vehicle idling.
- Enhancing existing powers for smoke control linked to tackling air pollution from domestic burning (PM_{2.5}).
- A duty on inter-sectoral bodies to adhere to guidance encouraging action on air pollution.

Three options have been considered for each of the proposals above, including a 'do nothing' option. For each option, the relative costs and benefits have been assessed as far as possible at the time of writing. Following the White Paper consultation we will undertake a full RIA which will set out costs and benefits in more detail.

Options, costs and benefits

This section will examine the associated costs and benefits of each legislative proposal in the White Paper in turn with multiple options considered in order to determine the best possible approach to improving air quality in Wales.

The review and publication of a Clean Air Plan for Wales

This section of the RIA is to support the review and publication of a Clean Air Plan for Wales.

Three options have been considered for publishing and reviewing a Clean Air Plan for Wales to ensure essential action is taken to tackle air pollution to achieve the best outcomes for current and future generations:

Option one – Do nothing (baseline);

Option two – Strengthen the current policy approach;

Option three – Set requirements in law in relation to Clean Air Plans for Wales.

Option one – Do Nothing

Description

Option one would represent no change to the current arrangements. In August 2020, the Welsh Government published the first Clean Air Plan for Wales. This Plan sets out action across many Government departments and public sector organisations. It includes ambitions to meet and where possible exceed requirements set at a UK level.

Under this option, there would not necessarily be a commitment by Welsh Government to review/publish any further Clean Air Plans for Wales.

Paragraph 2 of Schedule 12 to the UK Environment Bill amends the Environment Act 1995. The amendment in respect of the National Air Quality Strategy clarifies that the UK Secretary of State is no longer responsible for producing an Air Quality Strategy on behalf of the Devolved Administrations. The other effect of the amendment is that there will be a UK-wide Strategy (separate from any Strategies produced by the Devolved Administrations), comprising Welsh, Scottish, Northern Irish and English elements. The UK Strategy must be reviewed after 12 months (from the point the provision comes into force) and every 5 years thereafter.

Given air quality is devolved, Welsh Ministers are responsible for reviewing and publishing their own Plan/Strategy. Currently, there is no requirement set in law for the Clean Air Plan for Wales to be reviewed and published to set timescales.

Costs

There would be no additional costs to Welsh Government or any other sector/organisation under this option. However, there will be increased costs over time if the adverse health effects resulting from poor air quality take effect and the issues around poor air quality, health and inequalities are not addressed.

Benefits

There would be no additional expenditure for Welsh Government or any other sector/organisation under this option.

Summary

Option one would amount to preservation of the status quo with no additional expenditure for any sector or organisation. However, the costs to health and social care services would be likely to increase in future years in order to deal with the health impacts of poor air quality.

Option two – Strengthen the current policy approach

Description

Under option two, the Welsh Government would commit to review and publish a Clean Air Plan for Wales at its own discretion without the review, publication and timescales for review being set down in legislation. In this way, Clean Air Plans for Wales would be reviewed and published at regular intervals but there would be no requirements set in law in relation to the Clean Air Plans for Wales.

Costs

There would be costs associated with reviewing and re-publishing the Clean Air Plan. Officials will be carrying out work to estimate these costs and these will be provided in future RIAs. More widely, there would be increased costs over time if the adverse health effects resulting from poor air quality take effect and the issues around poor air quality, health and inequalities are not addressed.

Benefits

It is unlikely there would be any significant additional expenditure for Welsh Government or any other sector/organisation under this option.

Summary

Under this option, Clean Air Plans for Wales would be produced at the discretion of the Welsh Government with no specific requirements set in law. It is unlikely any significant additional expenditure would be incurred. However, improving air quality requires a systematic approach which is facilitated by requirements set in legislation.

Option three – Set requirements in law in relation to Clean Air Plans for Wales

Description

Under option three, the Welsh Government proposes to include a provision in the Clean Air Bill to publish a revised Clean Air Plan or Strategy within 12 months of the Bill being enacted with the content of the Clean Air Plan being reviewed every 5 years. Such reviews will enable Welsh Ministers to update and amend the Clean Air Plan as and when necessary.

Costs

Up to £350K is required for future evidence necessary to support the ambitions in the Clean Air Plan, including understanding how and by when compliance with a new statutory target based on the WHO guideline for fine particulate matter can be achieved. Costs for a new sensitive receptor monitoring

network are likely to be up to £400K in the first year and up to £200K thereafter. Work is ongoing to identify a potential contribution from Health and Social Services due to the savings to the NHS associated with improvements in air quality. It is also assumed up to £2 million will be required for the first year costs associated with an Air Quality Monitoring and Assessment Centre or Service, with an estimated £1 million per annum required thereafter. While these costs are associated with the Bill provisions, including wider work, the costs of reviewing and re-publishing the Clean Air Plan will be administrative, for example staff time and translation.

The annualised cost to society across all sectors and Ministerial Portfolios in Wales for measures which achieve a notional Welsh share of the UK statutory air pollutant emission reduction targets for 2030 is estimated to be £10.5 million per annum. These are estimated costs and there is not sufficient information available to break down these costs to the individual sectors.

Benefits

Option three entails administrative costs in relation to reviewing and re-publishing the Clean Air Plan. Officials will be carrying out work to estimate these costs and these will be provided in future RIAs. However, in the longer-term and particularly with the implementation of the actions within the Clean Air Plan, there will be savings in terms of reduced health and social costs and improved economic productivity. It is estimated the exposure of 3.16 million people in Wales to an average concentration of $6\mu\text{g}/\text{m}^3$ of fine particulate matter corresponds to a monetised health impact of £950M per year (central estimate),¹ based on mean levels of $\text{PM}_{2.5}$ where people were exposed (in 2016).

The Clean Air Plan for Wales is a means of arranging a set of policies and ambitions for improving air quality in a systematic way to aid and facilitate delivery. The Welsh Government believes enshrining the process for publishing and reviewing a Clean Air Plan in legislation will ensure essential action is taken to tackle air pollution to achieve the best outcomes for current and future generations.

Summary

Option three is the preferred option as this provides for requirements for the review and publication of the Clean Air Plan for Wales to be set in law. This will ensure essential and timely action is taken to tackle air pollution. Administrative costs are associated with the review and re-publishing of the Clean Air Plan. However, the current Clean Air Plan, including those which appear in the future, will lead to improved health and a reduction in health and social costs, including improved economic productivity.

Air Quality Target Setting Framework

This section of the RIA is to support the proposal to introduce a target setting framework in Wales.

Three options have been considered to achieve the Welsh Government's objective of developing evidence-based and effective target-setting legislation for the benefit of current and future generations:

Option one – Do nothing (baseline);

Option two – Strengthen the current policy approach;

Option three – Introduce a new fit for purpose air quality legislative framework for Wales.

Option one – Do Nothing

Description

¹ The Clean Air Plan for Wales, <https://gov.wales/sites/default/files/publications/2020-08/clean-air-plan-for-wales-healthy-air-healthy-wales.pdf>

Under this option, the intention would be to maintain the current approach to managing ambient air quality. This involves maintaining the current statutory ambient air quality objectives, which Local Authorities have to work towards, and target values stemming from EU Air Quality Directive for the protection of human health and the environment. Option one is provided as a baseline for comparison with the potential benefits of strengthening the current approach and introduces a framework for Welsh Ministers to set new evidence-based air quality targets in the future.

Costs

The intention under this option would be to maintain the current Welsh Government budget for managing air quality. While there would be no new costs to the Welsh Government from this option initially, there will be increased costs over time as the health problems resulting from poor air quality become more apparent, with the emergence of improved evidence, and the issues around poor air quality, health and inequalities are not addressed. Based on mean levels of PM_{2.5} where people were exposed (in 2016), it is estimated that 3.16 million people in Wales are exposed to an average concentration of 6µg/m³ of fine particulate matter corresponds to a monetised health impact of £950M per year (central estimate).² This estimate includes both direct costs, for example, chronic mortality, respiratory hospital admissions, coronary heart disease, strokes, asthma in children and lung cancer, and indirect costs such as productivity and building soiling. The biggest savings will be made through the reduction of costs incurred to the NHS and workplace as health impacts associated with air pollution reduce the need for medical care and the impact on workplace productivity. Existing resources to manage air quality would continue to be provided although increased funding may be needed to respond to the associated health and social costs.

Although the Clean air Plan for Wales outlined actions to reduce overall sources of pollution, including for PM_{2.5}, exposure to PM_{2.5} continues to pose a significant risk to health. Furthermore, evidence on the disproportionate effects of exposure to poor air quality on sensitive groups is continuing to emerge. Doing nothing therefore would not address this issue. The Welsh Government considers the long-term costs of not taking further action to protect public health and reduce exposure to PM_{2.5} concentrations, particularly for sensitive groups, are too high.

There would be no additional costs to local authorities or other public or private bodies from this option.

Benefits

A potential benefit of doing nothing would be an initial cost saving, as other options contain implementation costs to the taxpayer and statutory delivery agents.

Summary

Option one is to continue managing ambient air quality as it currently stands in keeping with the current statutory air quality objectives. No new implementation costs to Local Authorities will be realised. However the costs to health and social care services are likely to increase in years to come to deal with the health impacts of poor air quality.

Option two – strengthening the current policy approach

Description

This option would maintain the current ambient air quality standards in Wales stemming from the associated European directives and would amend them to mirror or exceed potentially more stringent EU standards set in the future. The Welsh Government is committed to taking proactive action to improve air quality for the benefit of public health, the environment and biodiversity and the economy. This option would ensure the gradual development of targets, although future targets may not be introduced at a time or in a way which focuses actions to achieve the most effective improvement in Wales. As recognised by the World Health Organisation, the target setting process needs to aim to

² The Clean Air Plan for Wales, <https://gov.wales/sites/default/files/publications/2020-08/clean-air-plan-for-wales-healthy-air-healthy-wales.pdf>

achieve the lowest concentrations possible in the context of local constraints, capabilities and public health priorities. Setting new targets which are dependent on events outside of Wales and the UK would risk making it more difficult to integrate them with other national and local policies for the long-term well-being of Welsh citizens. This option is reactionary and will require the Welsh government to respond when changes are made in Europe rather than being proactive as in Option 3 where Wales has a framework in which they can set their own targets.

Costs

The budget for managing air quality would be maintained, although it is likely to need to be reviewed and increased following the introduction of potentially more stringent targets in the future. This option is reactionary and therefore it is difficult to predict when costs will be required and what those costs will be. Costs for non-Welsh Government departments would depend on the form of the target set.

Benefits

Further and more stringent targets, including standards which mirror or exceed EU future standards, will help focus actions to reduce the harm caused by poor air quality. This may reduce costs to the health service if actions taken to improve air quality result in improved health for Welsh citizens, a reduction in aggravation of existing health conditions and reduced demand on health services as a result of improved air quality. It is difficult to quantify the benefits of future unspecified targets in the absence of information in relation to the pollutant, its level, the metric or compliance date.

Summary

Option two will strengthen the current policy by introducing new targets in line with changes to EU future standards. This is a reactionary option and it is therefore difficult to predict the costs or benefits that will be experienced by following this option. It is likely health benefits will be achieved only if improved air quality standards are brought in and introduced effectively. Timescales are unknown for option two. This is not considered the best option for improving the health and wellbeing of Welsh citizens

Option three – enact an air quality legislative framework for Wales including provision to set targets for fine particulate matter (PM_{2.5})

Description

This option would introduce an air quality legislative framework with a requirement for Welsh Ministers to set one or more air pollutant targets, including for fine particulate matter (PM_{2.5}) in ambient air concentrations, in secondary legislation by regulation.

This will enable additional targets to be set in the future to achieve effective and long-term outcomes for current and future generations. The setting of new legally binding air quality targets can help to drive action to improve the air we breathe and provide direct benefits for public health, habitats and biodiversity. Once targets have been set the framework will introduce a cycle of measurement, assessment and reporting. The aim of a target for PM_{2.5} is to reduce concentrations across Wales to below the WHO guideline where it is possible, and lower still where there is sufficient potential and high public exposure or risk to sensitive groups. Our previous analysis indicated significant progress is likely to be made in reducing PM_{2.5} by 2030, and further enhanced by taking the most cost-effective multi-pollutant and cross sector technical measures (accounting for legislative and technical developments).² However, it did not outline an agreed pathway of policy measures accounting for full economic viability, or practical deliverability. New targets need to be based on sound evidence to ensure they are challenging but realistic and likely to achieve the right outcomes. The process to determine new air quality targets which are effective, proportionate and practically feasible is complex and time consuming and will require further analysis and advice as the process develops.

An indicative analysis of the impacts of a setting targets is provided in the next section. However, a detailed analysis of the expected impacts of the secondary legislation will be carried out during the course of its development when the specific target details have been finalised.

Costs

The costs for implementing a Target Setting Framework will be mainly administrative and will fall to the Welsh Government. There will be consultation with the Natural Resources Wales (NRW) and other stakeholders, but costs to these external agencies associated with the consultation process are expected to be minimal. Welsh Government will undertake the work necessary to set up the framework, actual costs for undertaking this work are unquantified at this time.

In addition to the costs of setting up the framework, there will be future costs of setting targets within the framework. Work will need to be carried out to identify what actions will be required to meet any potential targets to ensure they are feasible and effective within any specified timescales. This includes determining the appropriate air quality monitoring, modelling and reporting capabilities necessary to measure, assess and report on compliance with specific targets. Under the Clean Air Plan £350,000 was estimated for this work.

It is not currently possible to estimate the cost of implementing new regulation as the scope of action required has not been defined. However, we have previously undertaken research that is likely to require similar action to the ones needed to reduce concentration of air pollutants in Wales, which has provided an insight into the likely level of cost.

We commissioned an assessment of current and future levels of air pollutants in Wales, their source, and the potential for further reductions through measures which achieve a notional Welsh share of the UK's statutory emission reduction targets. We also considered the progress these measures will deliver in terms of reducing the number of people exposed to levels of PM_{2.5} exceeding the World Health Organisation guideline levels and reduce overall exposure.

This section does not include its own estimate of costings but details the costings projected for each measure to achieve the notional Welsh share of national emissions reduction commitments required by the UK in the EU National Emissions Ceilings Directive (NECD). These estimates are based on previous research undertaken by the Welsh government.¹ The research looked at broad sectors where costs may fall but does not take into account any supporting grants provided by the government to businesses/citizens who may struggle to adapt to the requirements of any proposed legislation.

The findings indicate the most effective model to meeting the requirements of the NECD would cost approximately £10 million per annum, saving 3.19kt of PM_{2.5} and 11.23kt of NO_x from being emitted³. However it is important to highlight research undertaken did note some uncertainties, including those in the estimations of emissions used in the baseline data⁴ and the estimation of feasible uptake of new measures by the sectors impacted. The cost of implementation of each measure was derived from a review of available literature and may differ slightly if new regulation is implemented. A detailed analysis of the expected costs and benefits associated with the subordinate legislation will be carried out during the course of its development when the specific target details have been finalised.

Benefits

The main benefits of having a Target Setting Framework are that it allows the Welsh Government to react quickly to improve air quality within Wales when new evidence arises. Welsh Government can ensure that there is an evidence-based approach to any air quality targets set and will be able to identify which measures will need to be taken prior to setting any new targets. The benefits to health will be able to be realised much quicker as new targets can be brought in more easily. This in turn will reduce health and social care costs. The benefits of better air quality will improve biodiversity and outside spaces which in turn can improve people's health and wellbeing and make spending more time outside being active more attractive.

Further research was commissioned by the Welsh Government to investigate how the impact by measures used in the emissions reduction study would translate to health benefits for the citizens in

³ Note: Costing output from the modelling does not account for taxation, state support or sunk costs.

⁴ Detailed explanation of uncertainties can be found in Appendix E of the latest NAEI report found at https://uk-air.defra.gov.uk/assets/documents/reports/cat09/2010220959_DA_Air_Pollutant_Inventories_1990-2018_v1.2.pdf

Wales. Using 2016 as a baseline year, a national assessment of £50.00 (PM_{2.5}) and £6.30 (NO₂) per person per ug/m³ per year was derived from the UKIAM and used in the equation shown below:

$$\begin{array}{l} \text{The resulting} \\ \text{reduction in} \\ \text{population weighted} \\ \text{mean concentration} \\ \text{of PM}_{2.5} \text{ or PM}_{10}, \\ \text{averaged over the} \\ \text{Welsh population} \end{array} \times \begin{array}{l} \text{Population of} \\ \text{Wales (3.16m)} \end{array} \times \begin{array}{l} \text{Monetised} \\ \text{benefit per} \\ \text{person per unit} \\ \text{change in} \\ \text{concentration} \end{array}$$

The findings from this investigation suggest that the implementations of the most feasible list of measures would generate an estimated monetised health impact of £76 million (range £21 million to £230 million) from the associated reductions of PM_{2.5} and £15 million (range £1.5 million to £62 million) from the reductions of NO₂.

The benefits reported are supported by the available evidence. The health benefit costs quoted within this report to illustrate the benefits of the implementation of possible measures have been derived from the UK Integrated Assessment Model (UKIAM) which has been peer reviewed and adopted by the UK Government. The estimated benefit costs presented are therefore considered to be derived from an appropriate costing model.

Summary

Option Three is the preferred option as it allows the Welsh Government to react quickly to improve air quality in Wales. The cost of setting up the Framework is minimal compared to the health costs caused by poor air quality. The Target Setting Framework will deploy an evidence-based approach to ensure that any measures required to be taken to meet any targets do not detrimentally affect Welsh people especially those in disadvantaged groups. Improvements in air quality are likely to have the biggest positive effect on children, those living in poverty and those living in areas with the highest levels of air pollution.

Local Air Quality Management (LAQM)

This section of the RIA is to support the proposals of the White Paper and Bill relevant to the LAQM framework.

Three options have been considered to achieve the Welsh Government's objective of improving current LAQM framework for the benefit of current and future generations:

Option one – Do nothing, business-as-usual scenario;

Option two – Strengthen current approach through updates to statutory and technical guidance;

Option three – Enhance and clarify LAQM legislation through Clean Air Bill.

Option one – Do nothing, business-as-usual scenario

Description

Under this option, the current approach to LAQM would be maintained. This involves no clarification of existing duties or proposal for additional ones. Option one is provided as a baseline for comparison with the potential benefits of other options.

Costs

The intention under this option would be to maintain the LAQM regime as it stands with no change in resources to Local Authorities and so no additional costs to the Welsh Government. However, maintaining the current approach will likely result in the continuation of reactionary measures as opposed to preventative ones. As such, the Welsh Government will likely incur costs associated with continued exposure to poor air pollution and related inequalities in the future.

There would be no additional upfront costs to Local Authorities or other public or private bodies from this option.

Benefits

There are no identifiable benefits from this business-as-usual option. It maintains the status-quo and presents no upfront costs to the Welsh Government or any other body. This could be viewed as a benefit but would likely come at a cost to wider societal and environmental health.

Summary

Option one is to continue with the current LAQM regime as set out in Part IV of the Environment Act 1995. No new implementation costs to the Welsh Government or Local Authorities will be realised however there is a potential for other health and social costs to arise if the LAQM regime is not improved to act in a preventative manner.

Option two - Strengthen current approach through updates to statutory and technical guidance

Description

This option would maintain the current LAQM approach as it exists in legislation with improvements coming from updated statutory and technical guidance for Local Authorities. This option would rely on Local Authorities duty to take updated guidance into consideration when assessing local air quality.

Costs

The budget for LAQM would be maintained although review may be necessary if Local Authorities feel current funding is insufficient to undertake tasks detailed in updated guidance.

Costs of updating the statutory and technical guidance would be almost entirely administrative and fall to the Welsh Government.

Additional health and social costs may be incurred if Local Authorities fail to update their LAQM strategies in line with the updated guidance as, under these conditions, air quality may improve more slowly. These costs cannot be quantified as it is not possible to predict the individual extent of new guidance uptake by each of the Local Authorities.

Additional costs outlined in option three, associated with action implementation, feasibility studies and modelling assessments, may also be incurred here if Local Authorities choose to engage fully with the updated guidance.

This option is unlikely to involve any cost to other public or private bodies.

Benefits

Improved and clearer guidance will make the need for Local Authorities to take preventative action explicit thus improving the LAQM regime and reducing the chance of air pollution exceedances. This may result in reduced costs to health services if the actions taken result in improved air quality in Wales.

However, whilst Local Authorities have a duty to take guidance into consideration, it is difficult to quantify how when these updates will improve air quality and so benefits are difficult to quantify.

Summary

Option two will strengthen the current regime by updating guidance to give a clearer picture of how Local Authorities should tackle LAQM in their area. This option intends to encourage preventative action across an area to reduce the likelihood of exceedances. However, this option is likely to be less effective as, while guidance should be followed and adhered to, it does not necessarily have the same strength and clarity as incorporating it explicitly into the legislative framework.

Option three – Enhance and clarify LAQM legislation through Clean Air Bill

Description

This option intends to update the LAQM legislative framework with corresponding policy and funding considerations following a comprehensive review. In the first instance, this involves transposing the LAQM legislation into the Clean Air Act to remove ambiguity in relation to existing organisational duties. The legislation will include a requirement for Local Authorities to undertake regular reviews of their monitoring and assessment strategy to ensure a proactive and preventative regime. These reviews will take place annually as part of the existing APR process. Local Authorities will also be required to project a compliance date for any declared AQMAs following the production and appraisal of an AQAP (with a requirement that these must also be reviewed every 5 years).

Additionally, the proposed 'partners' concept will be introduced to improve collaboration and provide needed support to Local Authorities who often may not be able to deliver air quality improvements alone. Legislation will clearly state that an organisation designated as a 'partner' cannot reasonably refuse to engage with the Local Authority in developing effective action to improve air quality unless it would be unreasonable to ask them to do so and they are able to justify this with suitable evidence.

Costs

The costs for updating the legislative framework will be mainly administrative and so will fall to the Welsh Government. The Welsh Government will carry out the necessary work to set up the new legislative framework but actual costs for undertaking this work are unquantified at this time.

Any additional costs to Local Authorities are likely to appear in the form of modelling assessment, feasibility studies and action implementation as discussed briefly below.

Requirement of regular, comprehensive monitoring assessment may result in a small cost to Local Authorities in the form of time and potential addition of monitors to a network. Any costs to Local Authorities may be offset to some extent by savings and/or reallocations of time and resources from monitoring sites found to be redundant (i.e. reporting consistently low pollution levels).

Prediction of compliance dates as a part of AQAPs are likely to result in costs to Local Authorities in the form of feasibility studies and action implementation. Feasibility studies will be required in order to assess the viability of a compliance date and consider how compliance will be achieved in this time. Feasibility studies have previously cost between £20k and £80k giving a wide range of potential expenditure for Local Authorities. Furthermore, actions highlighted in AQAPs will have associated implementation costs. There are a wide range of actions Local Authorities may choose to implement and so a wide range of potential costs. Examples include engagement-centric strategies which may present only minimal costs and large infrastructure projects which may cost upwards of £5 million. The cost to each Local Authority will be specific to their action plan and so are difficult to quantify at this point. Although Local Authorities are currently required to develop measures for AQAPs, potential increased costs to Local Authorities for projecting a compliance date will be investigated and the need for additional funding assessed.

The 'partners' concept is expected to present minimal costs to Local Authorities in the form of staff time. Any designated 'partners' may also need to allocate time to collaborate with their relevant authority. These costs are expected to be minimal and offset by the increased cost efficiency and productivity of collaborative working in a community.

The costs of implementing the legislative framework, with additional guidance updates, have not been quantified at this point.

Benefits

Proper delivery of these legislative proposals will deliver an LAQM regime proactively seeking out and addressing air quality problems in the soonest possible time in a preventative and health-focussed manner. Under the new regime, action will be taken for public health benefits, not just to achieve compliance with legal limits. This will result in reducing exposure, protecting the most vulnerable members of society and striving to achieve the lowest reasonably practical levels of air pollution. This will more effectively protect public health and so is likely to reduce related health and social costs currently incurred. Costs associated with preventative action may be lower than those associated with reactive measures due to more effective planning. Therefore, a preventative approach is likely to increase the value for money of projects.

Additionally, improved collaboration between local organisations will provide more effective and efficient improvements. Furthermore, any 'partners' are likely to benefit from a more productive and healthy workforce with any decrease in air pollution they (or others) help to facilitate. A collaborative effort will support the development of healthy and active communities in line with the Well-being of Future Generations (Wales) Act 2015.

Summary

Option three is the preferred option as it will facilitate a more preventative, proactive and health-focussed LAQM regime in line with the approach set out in the Well-being of Future Generations (Wales) Act 2015 and Prosperity for All: the National Strategy. The costs of improving the legislative regime are likely to be minimal in comparison to the health and social costs associated with poor air quality across Wales. Additionally, potential increased costs to Local Authorities in delivering option three will be investigated and the need for additional funding assessed.

Consolidated Powers for Road User Charging

This section of the RIA is the support the proposals of the White Paper and Bill relevant Road User Charging (RUC) powers in Wales specifically in relation to air quality through: the creation of dedicated RUC powers for trunk roads; the widening of current restrictions on the use of net proceeds from RUC on trunk roads; and the commencement of existing powers in relation to Local Authority charging schemes. Updating this legislation aims to enable, where required, the efficient introduction of effective Low Emission Zones (LEZs), Clean Air Zones (CAZs) and other forms of RUC to facilitate air quality compliance and improvements across Wales

Below are the options considered in relation to this section on amending powers for RUC:

Option one – Do nothing, business-as-usual scenario;

Option two – Develop LEZ or CAZ framework and commence local authority charging powers under Transport Act 2000;

Option three – Consolidate RUC powers through the Clean Air Bill.

Option one – Do nothing (baseline)

Description

Under this option, the current legislation surrounding RUC would be maintained. This means there would be no commitment, currently, to commencing existing powers for local authorities (either by themselves, or in a regional partnership with neighbouring authorities) to fully implement charging schemes for the purpose of air quality improvement. Moreover, under this baseline scenario charging provisions for trunk roads would not be consolidated within the Bill and net proceeds from any road charging implemented can only continue to be used for local transport policies, limiting investment flexibility. This option is provided for baseline comparison.

Costs

The intention under this option would be to maintain the current RUC regime so no additional costs to the Welsh Government would be incurred. However, costs associated with continued public exposure to air pollution and failures to meet air quality targets will continue to be experienced. Public Health Wales have published advice on the health implications of poor air which cites the UK Committee on the Medical Effects of Air Pollution estimates that air pollution is responsible for “an effect equivalent of between 28,000 and 36,000 deaths (at typical ages) each year.”⁵ In Wales it was estimated to be the equivalent of between 1,000 to 14,000 deaths each year.

Without the proposed RUC legislation specifically catered towards the improvement of air quality in this Bill, any future Low Emission Zone (LEZ) or Clean Air Zone (CAZ) Framework could not include a charging element and, therefore, would be likely to be less effective. The recent Independent Review of RUC⁶ echoes this remark by stating that within a LEZ “enforcement by testing can often be complicated”. Less efficient enforcement could result in increased use of Welsh Government/Local Authority resources and as a result increased costs incurred.

Welsh Government has made a commitment to publish a LEZ or CAZ Framework in spring 2021, which would be jeopardised under this option.

Benefits

This “do nothing” option maintains the status quo. Not providing dedicated RUC powers in the Bill as a method for air quality improvement will, to some extent, limit its effectiveness. This will likely reduce RUC usage and similarly LEZ or CAZ adoption when they are required. Consequently, the requirement for transportation compliance, upgrading vehicle fleets and its associated disruption to meet LEZ or CAZ requirements will be reduced. This could be seen as benefit but could reduce Wales’ ability to meet its air quality objectives and reduces any related benefits to wider societal health and the environment.

Summary

Option one results in no new implementation costs to the Welsh Government or Local Authorities. However there is a potential for other health and social costs to arise if effective tools such as RUC and LEZ or CAZ for addressing air quality are not strengthened. There is an argument for implementing LEZ or CAZ in a preventative manner. Not establishing an effective link between RUC and LEZs or CAZs for air quality and transport is a missed opportunity.

Option two - Develop LEZ or CAZ framework and commence local authority charging powers under Transport Act 2000

Description

Under this option, the current legislation surrounding RUC would be maintained, and existing local authority powers under Transport Act 2000 commenced through regulations. The development of Welsh Government frameworks for tools such as LEZs or CAZs would continue. Within our Clean Air Plan we set out our expectation that we will see “Clean Air Zones established in towns and cities throughout Wales to reduce the impact of transport emissions on health”. This option would develop that ambition without committing to the consolidation of road user charging provisions in the Bill.

Costs

The costs for updating the legislation will be mainly administrative and will be met by Welsh Government. Actual costs for undertaking this work are unquantified at this time.

⁵ <https://phw.nhs.wales/services-and-teams/environmental-public-health/air-quality/air-pollution-and-health-fact-sheet/>

⁶ <https://gov.wales/independent-review-road-user-charging-wales>

Additional costs to Welsh Government, and Local Authorities, where charging schemes may be introduced, will arise in the form of modelling, assessments and feasibility studies for implementation of specific measures that are deemed appropriate to address their air quality needs. There will also be costs to implement measures locally, for instance through the necessary equipment to enforce a charging scheme.

Additional health and social costs may be incurred if Local Authorities fail to update their guidance on new legislation as air quality improvement could be delayed.

This option is unlikely to involve any immediate cost to other institutions, although there would be costs to road users associated with subsequent compliance with a charging scheme.

More developer costs in the form of actual RUC implementation or LEZ or CAZ adoption will be considered in future framework documents and associated RIAs.

Not committing to consolidating RUC powers in this Bill will mean we will remain reliant on existing powers which may be less efficient to deploy. The lack of establishing a clear legislative link to air quality could reduce uptake of air quality improvement tools and increase costs associated with continued public exposure to air pollution.

Benefits

The commencement of existing RUC powers through secondary legislation helps in providing a tool which delivers a method for transport demand management and direct emission reduction which will reduce costs associated with public exposure to poor air quality. Recently stated in the Independent Review:-

“RUC can be an excellent tool to help the Welsh Government and Welsh Local Authorities deliver a more equitable, efficient and sustainable transport system directly for all road users and for others across the wider transport system. Furthermore, in the spirit of the Well-being of Future Generations Act⁷, it can help Government achieve wider economic, societal, cultural and environmental priorities such as improving air quality, sustainability and benefiting ‘placemaking’ and health.”

The continuation of the development of a Welsh Government framework for tools such as LEZs or CAZs is of great benefit to reducing the impact of transport emissions on health. This is aligned with the consultation on the new Transport Strategy for Wales, which envisions a transport system which is good for people and communities, and creates a stronger link between transportation and air quality.

Summary

This option takes beneficial steps in the direction of air quality improvement through continuing the development of necessary tools to combat air pollution. However, without the consolidation of RUC powers in this bill which creates clear alignment with air quality improvement, proposed tools such as LEZs or CAZs could be rendered less effective and attractive. This reduction in effectiveness could increase administrative costs and weaken future frameworks which is not considered a sensible approach or in line with current Welsh Government ambitions.

Option three - Consolidate RUC powers through Clean Air bill

Description

To meet commitments outlined within our Clean Air Plan⁸, and to ensure that powers are readily available in Wales to introduce LEZs or CAZs with effective charging provisions, the following actions are required.

⁷ <https://www.futuregenerations.wales/wp-content/uploads/2017/01/WFGAct-English.pdf>

⁸ <https://gov.wales/clean-air-plan-wales-healthy-air-healthy-wales>

Commencement of relevant provisions under the Transport Act 2000 to enable Local Authorities (either by themselves, or in a regional partnership with neighbouring Authorities) to fully implement charging schemes.

Creation of a new standalone charging regime for trunk roads through the Clean Air Act and the creation of a regulation-making power.

Broaden the current limitation on net proceeds from road charging on trunk roads to be invested in local transport schemes only.

Costs

The costs for updating this legislation will be mainly administrative and will be met by Welsh Government. Actual costs for undertaking this work are unquantified at this time.

Additional costs to Welsh Government, and Local Authorities, where charging schemes may be introduced, will arise in the form of modelling, assessments and feasibility studies for implementation of specific measures that are deemed appropriate to address their air quality needs. There will also be costs to implement measures locally, for instance through the necessary equipment to enforce a charging scheme and the staff required to administer the scheme.

Additional health and social costs may be incurred if Local Authorities fail to update their guidance on this new legislation as air quality improvement could be delayed.

This option is unlikely to involve any immediate cost to other institutions, although there would be a cost to road users associated with subsequent compliance with a charging scheme. For example, drivers of non-compliant vehicles may incur the costs of upgrading to a compliant vehicle, or may continue to use their existing (non-compliant) vehicle and pay the fee levied by a LEZ/CAZ scheme (this fee may vary between different schemes, but, for illustrative purposes, a daily charge of £10 for drivers of private cars was assumed in Cardiff Council's Clean Air Zone Study⁹).

The range of potential costs arising from implementation of charging schemes will be considered in more detail within future RIAs and framework documents.

Benefits

These proposed legislative changes would ensure Welsh Government, and Local Authorities have clear powers to introduce a charging scheme on roads for which they are the relevant traffic authority for the improvement of air quality. This proposed consolidation and commencement of RUC provisions acts on our desire to develop more demand management and emission reduction tools for air pollution.

This option is aligned with the consultation on the new Transport Strategy for Wales¹⁰, which envisions a transport system which is good for people and communities, contributing to a more equal and healthier Wales. Also, a transport system that is good for the environment, contributing to a more resilient and globally responsible Wales. Moreover, SWOT analysis within the Independent RUC review comments that with careful LEZ design and alignment with RUC, sustainable transport choices can be encouraged, and LEZs are easy to modify in line with improving air quality targets.

Also reflected in the Transport Strategy is the need for a regional approach to transport planning and RUC schemes and their associated LEZs or CAZs can support significant place based reductions in vehicle use and emissions with consequent reductions in public exposure to polluted air. With a carefully defined fee structure, and fines for non-compliance, drivers of the most polluting (non-compliant) vehicles are encouraged to upgrade, conduct a modal shift or to take alternative routes to avoid charges, thereby alleviating the impact on the most polluted areas. This can improve the quality of life for those living in, or visiting, the designated area and reduce impacts on health conditions

⁹<https://cardiff.moderngov.co.uk/documents/s28262/Cabinet%2021%20March%202019%20Clean%20Air%20App%201%20App%20A.pdf>

¹⁰ <https://gov.wales/llwybr-newydd>

arising from poor air, reducing pressure on local health services. There are further health benefits arising through increasing the numbers of people using active travel alternatives.

Summary

Option three is the preferred option which provides opportunity to ensure air quality management tools and provisions meet the current needs of Wales, whilst reflecting closely, the direction being taken with our new Transport Strategy. The Clean Air (Wales) Bill provides a platform to bring provisions together in one place, ensure full commencement of RUC powers, to provide a much clearer legislative process. Consolidating existing legislation, in relation to trunk road charging, under the Clean Air (Wales) Bill, would enable a more tailored and clearer framework to be established. This will ensure that, where there is a case to introduce a charging scheme such as a LEZ, the legislative route to achieve this would be clear. This would increase efficiency and reduce bureaucratic burdens, ensuring time is minimised in the process.

Smoke Control

This section of the RIA is in relation provision on smoke control for potential inclusion in the Clean Air (Wales) Bill.

Three options have been considered to achieve the Welsh Government's objective of improving the use and enforcement of Smoke Control legislation for the benefit of current and future generations:

Option one – Do nothing, business-as-usual scenario;

Option two – Strengthen current approach through updates to statutory and technical guidance;

Option three – update Smoke Control legislation through Clean Air (Wales) Bill.

Option one – Do nothing, business-as-usual scenario

Description

Under this option, the current approach to Smoke Control would be maintained. This would mean no change to existing duties. Option one is provided as a baseline for comparison with the potential benefits of other options.

Costs

The intention under this option would be to maintain the smoke control regime as it stands. There would be no change in resources to Local Authorities and no additional costs to the Welsh Government. Maintaining the current approach is likely to result in the continuation of low take-up and use of Smoke Control Orders.

There would be no additional cost to Local Authorities or other public or private bodies from this option.

Benefits

There are no identifiable benefits from this business-as-usual option. It maintains the status-quo and presents cost to the Welsh Government or any other body. This could be viewed as a benefit, however, it could result in negative impacts to wider societal and environmental health.

Summary

Option one is to continue with the current Smoke Control regime as set out in Part 3 of the Clean Air Act 1993. No new implementation costs to the Welsh Government or Local Authorities will be realised. However, there is a potential for other health and social costs to arise if the Smoke Control regime is not improved to act in a preventative manner.

Option two - Strengthen current approach through updates to statutory and technical guidance

Description

This option would maintain the current Smoke Control approach as it exists in current legislation, with improvements coming from a more coherent approach to the determining of Smoke Control Orders.

Costs

The budget for Smoke Control would be maintained, although review may be necessary if Local Authorities feel current funding is insufficient to deliver on the support for improvements to appliances allowed under the Clean Air Act 1993.

Costs of this option have not yet been quantified, but there are expected to be revenue costs which will fall for the most part on Local Authorities.

Additional health and social costs may be incurred if Local Authorities fail to update their Smoke Control strategies. These costs cannot currently be quantified, as it is not possible to predict the individual extent of new uptake by each of the Local Authorities.

This option is likely to involve some cost to private homeowners, private landlords and public and third sector bodies responsible for housing.

Benefits

Improved and clearer guidance will make the need for Local Authorities action on Smoke Control more explicit. This will improve the Smoke Control regime and reducing the chance of air pollution exceedances. Guidance may also result in reduced costs to health services if the actions taken result in improved air quality in Wales.

Additional benefits may accrue from a reduction in the number of people in Wales living in fuel poverty. Subject to the mechanisms and support schemes adopted this may also contribute to reducing the reliance of Welsh households on all types of fossil fuels.

It is difficult to quantify how or when improved take-up of Smoke Control Orders will improve air quality and associated benefits.

Summary

This option intends to encourage preventative action across an area to reduce the burden and impact of fine particulate matter in the air.

Option three – update Smoke Control legislation through Clean Air Bill

Description

This option intends to integrate existing Smoke Control regulation within a Welsh legislative framework with corresponding policy and funding considerations following a comprehensive review. In the first instance, this involves transposing the Smoke Control legislation into the Clean Air Act in order to permit Welsh legislators better access to the tools to amend this legislation.

Costs

The costs for updating the legislative framework will be mainly administrative and so will fall to the Welsh Government. The Welsh Government will carry out the necessary work to set up the new legislative framework but actual costs for undertaking this work are unquantified at this time.

As stated in Option 2, additional costs to Local Authorities are likely to support updating and upgrading of existing appliances to ensure homes within Smoke Control Areas are compliant.

The partner's concept is expected to present minimal costs to Local Authorities in the form of staff time. Any designated 'partners' may also need to allocate time to collaborate with their relevant

authority. These costs are expected to be minimal and offset by the increased cost efficiency and productivity of collaborative working in a community.

The costs of implementing the legislative framework, with the associated cost to Local Authorities for implementation have not been quantified at this point.

Benefits

Delivery of these legislative proposals will enable a Smoke Control regime, which seeks out and addresses air quality issues in the soonest possible time. This will support a preventative and health-focussed approach. Under the new regime, action will be focussed on benefits for public health, not just compliance with legal limits. This will result in reduced exposure, protection of the most vulnerable members of society and supports us in reaching the lowest reasonably practical levels of fine particulate matter. Costs associated with preventative action are likely to be lower than those associated with reactive measures. More effective planning is likely to increase the value for money of the projects.

Summary

There is little difference between options two and three, however, option three is the preferred option as it will facilitate clearer legislative control for Welsh Ministers. The costs of improving the legislative regime are likely to be significantly lower. This action could reduce the level of health and social costs associated with poor air quality.

Anti-idling legislation

This section of the RIA is the support the proposals of the White Paper and Bill relevant to anti-idling legislation.

Three options have been considered to achieve the Welsh Government's objective of improving the current approach for the benefit of current and future generations:

Option one – Do nothing;

Option two – Introduce a new legislative framework governing anti-idling;

Option three – Strengthen the current policy approach.

Option one – Do Nothing

Description

Under this option, the status quo would be maintained. The current legislative framework, particularly the Road Traffic (Vehicle Emissions) (Fixed Penalty) (Wales) Regulations 2003, sets out the anti-idling legislation available to Local Authorities to tackle idling vehicles, for example the power to enforce. Under these regulations an idling offence carries a Fixed Penalty Notice of £20.

Option one is provided as a baseline for comparison with the potential benefits of strengthening the current legislative framework.

Costs

There would be no additional costs to local authorities or Welsh Government under this option. However, there will be increased costs over time if the adverse health effects resulting from poor air quality take effect and the issues around poor air quality, health and inequalities are not addressed. Idling can be an issue where there are regular occurrences of concentrated and sustained idling by older vehicles with less effective after treatment systems (where diesel exhaust emitted by the engine isn't cleaned as well as in more modern vehicles prior to being relayed through the tailpipe to the air outside). Examples of such occurrences could be idling outside schools by older school transport service buses (especially as concern for children's health is a common theme in relation to the impacts of idling); idling by older buses in city/town centre transport hubs (bus stations); idling by

older taxis (for example, outside train stations); idling by older, private motor cars outside schools; or idling by older, private motor cars outside shopping centres or level crossings etc. The increased costs of inaction would encompass health care costs; increased social costs; and the costs of sick leave and the resultant impact on economic productivity.

Benefits

There would be no additional expenditure for local authorities.

Summary

Option one would amount to preservation of the status quo with no additional expenditure for local authorities. However, the costs to health and social care services would be likely to increase in future years in order to deal with the health impacts of poor air quality.

Option two – Introduce a new legislative framework governing anti-idling

Description

Under this option, a new policy and legislative framework governing anti-idling would be introduced for with statutory duties on Local Authorities as follows:

- a duty on Local Authorities to pay due regard to guidance on developing and implementing anti-idling measures, including the enforcement of anti-idling (such as exists under option three);
- a duty on all Local Authorities to carry out anti-idling enforcement ; and
- a duty on all Local Authorities to increase the amounts of fixed penalty for idling (to increase the deterrent effect

Costs

Option two would incur significant additional expenditure on all Local Authorities in Wales. The additional expenditure has not been precisely quantified to date. Officials will be working with Local Authorities and internal colleagues in transport to estimate these costs and these will be provided in future RIAs. However, it can be argued that a robust enforcement regime has the potential to be self-financing (in terms of revenue received from fixed penalties). There is also potential for Local Authorities choosing to exercise these duties to share resources in relation to conducting anti-idling enforcement.

Benefits

There is some evidence to suggest that anti-idling measures can be most effective if included in a package of different but complementary measures, all with the purpose of preventing or reducing air pollution. In this context, there can be potential for achieving cumulative reductions in emissions, over time, across a range of different measures applied in tandem. In this way, the application and implementation of anti-idling measures would contribute to better health and the reduction of health and social costs. There would be potential for the additional expenditure incurred by Local Authorities to be offset by revenue received from fixed penalties and for Local Authorities to reduce any costs by sharing resources when carrying out anti-idling enforcement.

Summary

Option two would bind Local Authorities and/or Welsh Government to significant additional expenditure at a time of extreme budgetary pressures. Officials will be carrying out work in collaboration with transport colleagues, including the wider local government community, to estimate these costs and these will be provided in future RIAs.

Option 3 – Strengthen the current policy approach

Description

Under this option, the policy and legislative framework governing anti-idling would be strengthened. The Bill proposes to:

- impose a duty on Local Authorities to pay due regard to guidance on developing and implementing anti-idling measures, including the enforcement of anti-idling; and
- enable Local Authorities to increase the amounts of fixed penalty for idling (to increase the deterrent effect)

Costs

Any Local Authorities choosing to exercise their discretionary powers to carry out anti-idling enforcement or to increase the amounts of fixed penalty for idling would incur additional expenditure. Officials will be carrying out work to estimate these costs and these will be provided in future RIAs. The additional expenditure has not been precisely quantified to date. It can be argued that a robust enforcement regime has the potential to be self-financing (in terms of revenue received from fixed penalties). There is also potential for Local Authorities choosing to exercise these discretionary powers to share resources in relation to conducting anti-idling enforcement.

Benefits

There is some evidence to suggest that anti-idling measures can be most effective if included in a package of different but complementary measures, all with the purpose of preventing or reducing air pollution. In this context, there can be potential for achieving cumulative reductions in emissions, over time, across a range of different measures applied in tandem. In this way, the application and implementation of anti-idling measures would contribute to better health and the reduction of health and social costs. There would be potential for the additional expenditure incurred by Local Authorities to be offset by revenue received from fixed penalties and for Local Authorities to reduce any costs by sharing resources when carrying out anti-idling enforcement.

Summary

Option three is the preferred option as it would enable Local Authorities to contribute to improving air quality without placing legal obligations upon them at a time of extreme budgetary pressures.

Producing new inter-sectoral guidance to empower workforces to tackle air pollution

This section of the RIA is to support the proposals of the White Paper and Bill relevant to empowering workforces to tackle air pollution.

Three options have been considered to achieve the Welsh Government's objective of integrated and collaborative working for the benefit of current and future generations:

Option one – Do nothing;

Option two – Strengthen the current policy approach;

Option three – Introduce comprehensive new guidance to cover all sectors.

Option one – Do Nothing

Description

Under this option, there would be no change to current arrangements. In April 2018, the Welsh Government and Public Health Wales published 'Advice for NHS Wales staff - Working together to

reduce outdoor air pollution, risks and inequalities'.¹¹ This guidance complements existing air quality responsibilities and uses four principles to influence, communicate and champion air quality improvement within and beyond the NHS:

- supporting others to assess and appropriately prioritise air pollution in local areas;
- engaging senior local decision-makers to take local action on air pollution;
- communicating with the public (including patients) about local air pollution; and
- championing air quality improvement both outside and inside their organisations.

This guidance is non-statutory and does not apply to any other sectors/organisations other than NHS Wales. Under option one, this guidance would be the only guidance of its kind whereby workforces are empowered to tackle air pollution.

Costs

There would be no additional costs to Welsh Government or any other sector/organisation under this option. However, there will be increased costs over time if the adverse health effects resulting from poor air quality take effect and the issues around poor air quality, health and inequalities are not addressed.

Benefits

There would be no additional expenditure for Welsh Government or any other sector/organisation under this option.

Summary

Option one would amount to preservation of the status quo with no additional expenditure for any sector or organisation. However, the costs to health and social care services would be likely to increase in future years in order to deal with the health impacts of poor air quality.

Option 2 – Strengthen the current policy approach

Description

Under option two, new guidance on empowering workforces to tackle air pollution would apply to the public sector as a whole. It can be argued that a limited extension to the scope and reach of the guidance would not do enough to decrease costs over time if the adverse health effects resulting from poor air quality take effect and the issues around poor air quality, health and inequalities are not addressed.

Costs

The costs associated with option two have not been precisely quantified. Officials will be carrying out work to estimate these costs and these will be provided in future RIAs. It can be argued that such a limited extension to the scope of the guidance would not be enough to decrease the health and social costs, including the economic impacts, of poor air quality.

Benefits

There would be an extension to the scope and reach of the guidance. The public sector's leadership role would be reinforced and there would be a clear role for the public sector to lead the private and voluntary sectors by example.

Summary

¹¹ <https://gov.wales/sites/default/files/publications/2019-06/working-together-to-reduce-outdoor-air-pollution-risks-and-inequalities.pdf>

Under option two, there would be a limited extension to the scope and reach of the guidance. However, given the urgency of supporting improvement to air quality, it can be argued that the scope and reach of the guidance has to be wider.

Option three – Introduce comprehensive new guidance to cover all sectors.

Description

Under option three, new guidance will be produced, put on a statutory footing and be made to apply on an inter-sectoral basis. The Bill proposes the following:

- to include a provision placing the guidance on a statutory footing so it applies to the public sector (NHS Wales; Natural Resources Wales; Local Authorities), including the private and the voluntary sectors
- to make it a statutory duty for stakeholders from the public, private and voluntary sectors to report on progress (every 6 months) and to be accountable for their actions/responsibilities to the Welsh Government

Costs

There would be additional costs to Welsh Government and the wider public, private and voluntary sectors. These costs have not as yet been precisely quantified. Officials will be carrying out discussions with all stakeholders to estimate these costs and these will be provided in future RIAs. However, it can be argued that empowering multi-sectoral workforces to tackle air pollution will, in the longer-term, substantially reduce health and social costs and promote productivity within the wider economy.

Benefits

The reach and impact of the guidance on empowering workforces to tackle air pollution would be maximised to cover all sectors (public, private and voluntary). This would make improving air quality everyone's business with employees and employers working together to tackle air pollution within workplaces thereby protecting workers and the wider communities. In the longer-term, there would be substantial cost savings in terms of decreased health and social costs and more productivity within the wider economy as workers are healthier and taking fewer sick days.

Summary

Option three is the preferred option as this provides for the production of comprehensive new statutory guidance to empower multi-sectoral workforces to tackle air pollution which, in turn, will lead to improved health and a reduction in health and social costs, including improved economic productivity.

The likely impact on our Communities, Economy and Environment

This section summarises the costs and benefits and likely impacts on our communities, economy and environment.

Impact on communities:

- Positive impacts on health as a result of cleaner air.
- Research into the impacts of poor air quality found that areas of high air pollution strongly correlate with areas of low household income and where the number of people with chronic ill health tends to be highest. Improving air quality will have a direct effect on equalities and may help promote a sense of community.

Impact on economy:

- Positive impacts on tourism and other outdoor activities as cleaner air may facilitate participation in outdoor recreation activities.
- Potential positive employment impacts as a result of additional work arising from the manufacture and installation of the abatement technologies.
- Potential costs associated with abatement on businesses but also positive effects on prosperity as a result of health benefits to the workforce¹².

Impact on environment:

- Positive impacts on biodiversity which results in improved ecosystem functioning.

Unquantified costs may be experienced by some sectors when new legislation is set, however, further detailed analysis on the costs of these proposals will be undertaken and a full RIA will be published with a draft bill.

¹² Costs to small businesses and the wider economy have been considered both quantitatively where possible and qualitatively to provide theory of costs that are not quantifiable.