

CONSULTATION

Response Document



43 Southgate Street, Winchester, Hampshire, SO23 9EH, UK
Tel: +44 (0)1962 868 626 | enquiries@cieem.net | www.cieem.net

Clean Air Plan for Wales
Llywodraeth Cymru | Welsh Government

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Introduction to CIEEM

The Chartered Institute of Ecology and Environmental Management (CIEEM), as the leading membership organisation supporting professional ecologists and environmental managers in the United Kingdom and Ireland, welcomes the opportunity to comment on this consultation.

CIEEM was established in 1991 and has over 5,000 members drawn from local authorities, government agencies, industry, environmental consultancy, teaching/research, and voluntary environmental organisations. The Chartered Institute has led the way in defining and raising the standards of ecological and environmental management practice with regard to biodiversity protection and enhancement. It promotes knowledge-sharing through events and publications, skills development through its comprehensive training and development programme, and best practice through the dissemination of technical guidance for the profession and related disciplines.

CIEEM is a member of:

- Environmental Policy Forum
- Greener UK¹
- IUCN – The World Conservation Union
- Professional Associations Research Network
- Society for the Environment
- United Nations Decade on Biodiversity 2011-2020 Network

CIEEM has approximately 400 members in Wales who are drawn from across the private consultancy sector, NGOs, government agencies, academia and industry. They are practising ecologists and environmental managers, many of whom regularly provide input to and advice on land management for the benefit of protected species and biodiversity in general.

We welcome the opportunity to participate in the consultation on a Clean Air Plan for Wales and would be happy to provide further information on this topic. We have only responded to questions which relate to our area of expertise below. Please contact Jason Reeves (CIEEM Head of Policy and Communications) at JasonReeves@cieem.net with any queries.

¹ Supporter Member

Comments from CIEEM

1. Does the thematic approach in the Clean Air Plan bring together the key air quality issues in a clear and helpful way?

The thematic approach does serve to simplify the main themes of an air quality plan but ultimately there will be an overlap across each theme with actions undertaken across one influencing the achievements across the other.

10. Do you support the proposals for a Clean Air Act for Wales?

Yes. There is, however, the question of who will be responsible for the promotion and/or delivery of measures to address air quality at the national and local level and whether they currently hold the skills, tools and resources to do so. Delivery of the scheme will rely on the knowledge, skills and resources of statutory agencies and local planning authorities alike to address these issues. However, such organisation may not have the resources to successfully implement new policies and measures, particularly within a consistent manner across Wales. For example, many local authorities no longer employ an ecologist who would be able to advise on biodiversity matters whilst planning officers are in need of more training and other support in assessing the air pollution impacts of, for example, agricultural and other rural developments.

The Clean Air Plan should make provisions for the recruitment and training of responsible government agencies to promote an increased understanding on the effect of air pollution across all themes and increase the capacity of these organisations to assess and regulate air quality in accordance with proposed legislation.

11. Are there additional issues a Clean Air Act should address?

There remains a need for further research into the effects of air quality to improve our understanding of ecological impacts and the potential measures that could be delivered to mitigate these impacts, providing certain and measurable outcomes. Such evidence would be beneficial in understanding the potential impacts of, for example, new development on sensitive habitats and the critical load of sensitive impacts at which impacts occur, allowing both local authorities, statutory agencies and consultants alike to measurably assess both negative and positive effects.

The Clean Air Plan should further promote collaborative working across all relevant industries, including the private sector and encompassing air quality experts and ecologists/environmental managers.

Currently the strategy focuses on promoting collaboration with regulatory bodies and communities, but we would also consider that collaboration with the private sectors is of equal importance, since any change also needs to be driven by the potential polluters. There is often a lack of understanding of other disciplines and how the data acquired by one translates into something useable by the other.

The requirements of the Act will only be effective with effective monitoring and governance, therefore a new independent environmental scrutiny body with enforcement is required to replace the role of the European Commission.

12. What other legislative or regulatory actions in relation to air quality should we consider improving people's lives and community wellbeing in a sustainable way?

Further details are sought in respect of the regulatory powers of statutory agencies in enforcing

legislation and air quality targets. For regulation to be effective it requires monitoring, sufficient resources to work with industry/business to address non-compliance, and the ability to take legal action. Without governance, the plan is unlikely to be successful.

As mentioned in our response to question 11, a new environmental governance body should also be established to replace the role of the European Commission to ensure effective governance.

25. What sorts of nature-based solutions could be promoted to help to reduce human exposure to air pollution?

There should be continued and more wide-spread drive to promote 'green development' particularly in cities, with focus on maximising biodiversity as far as possible through inclusion of, for example, street tree planting and protection of mature street trees, green walls and green roofs. Currently under consultation is the Swansea Central Area Green Infrastructure Strategy which sets out a strategy for the delivery of Green Infrastructure across the city. This should be replicated in other areas. We have recently produced a statement setting out our position on Welsh Government's Green Infrastructure Guidance².

Welsh Government should not rule out retrospective improvements within existing development to maximise positive air quality benefits. For example, retrospective implementation of a sustainable drainage strategy has recently been completed within Grangetown Cardiff. Although undertaken to reduce volumes of rainwater entering Cardiff's sewerage system, the inclusion of SuDS (sustainable drainage system) features, including rain gardens with tree and shrub planting, provide multiple benefits.

The use of nature-based solutions to help with air pollution is essential and can have additional benefits for biodiversity, however, it should not replace action on emissions reductions in the first instance.

26. How can we speed up the recovery of our biodiversity and ecosystems alongside emission reduction?

There is the potential to roll out actions within the Clean Air Plan alongside other planning policy including, for example, green infrastructure within new development which, when implemented will deliver multiple benefits to including air quality.

There is significant potential for speeding up the recovery of biodiversity through rural payments to farmers for delivering Sustainable Land Management outcomes as per recent the Sustainable Farming and Our Land consultation, to which we responded and supported an outcome-based approach³.

Recovery can further be promoted through working with developers at an early stage of planning to ensure benefits for ecosystems, such as green infrastructure, are built in at an early stage and are designed to maximise effects upon air quality.

We welcome the coordinated approach to achieving emissions reduction by developing the Environmental Growth Plan. Solutions to air pollution issues should not be at the expense of areas that are important for biodiversity in other ways, for example, trees should not be planted over priority open habitats.

² <https://cieem.net/wp-content/uploads/2019/09/CIEEM-Green-Infrastructure-Briefing-Wales-August-2019-FINAL.pdf>

³ <https://cieem.net/wp-content/uploads/2019/11/Sustainable-Farming-Our-Land-CIEEM-response-FINAL.pdf>

27. What activities can we emphasise in our environmental growth plan to help tackle air pollution and its impact on ecosystems in Wales?

We support the concepts of stop, grow and change within an Environmental Growth Plan. However, a plan should include measures for supporting change. There is only so far one can encourage an ethos of 'doing the right thing' without providing alternative means. For example, the general public cannot be encouraged to use public transport if it is disproportionate expensive, runs on a limited timetable and/or is not accessible from home location. A push to exchange petrol cars for electric would not be successful if there is not the supporting infrastructure in terms of frequent and accessible charging points.

There remains a need for further research into the effects of air quality to improve our understanding of ecological impacts and potential measures that could be delivered to mitigate impacts, providing certain and measurable outcomes. Particularly in relation to ongoing impacts upon Natura Sites arising from air pollution and/or nutrient enrichment of water courses. Ultimately there appears to be little understanding in the nature and scale of impacts that can arise, how such impacts can be measured and how can they be mitigated. This should be included in the Environmental Growth Plan.

28. Do the proposed commitments and actions address the issues described in natural environment, ecosystems and biodiversity section of the Plan?

There should be further emphasis on collaborative working across government boundaries and the sharing of research and data as impacts occur across boundaries. The actions within the Clean Air Plan should be consistent with those introduced into England and vice versa, both plans supporting the other.

29. Do you agree the actions will help to reduce the impact of air pollution on natural environment, ecosystems and biodiversity in Wales?

We agree that the actions addressed in this consultation will help to reduce impacts of air pollution. However further detail should be provided on who will ultimately be responsible for implementation, and the necessary funding, resources and training.

Welsh Government should ensure that local authorities have sufficient skills and resources to make comprehensive assessments and decisions on air pollution issues.

These actions will only be effective with effective monitoring and governance, therefore a new independent environmental scrutiny body with enforcement is required to replace the role of the European Commission.

What is also not clear are whether such actions and measures will adequately account for population growth across Wales. An increased population will result in increased development with traffic, more waste and more pollution.

30. What additional commitments or actions would you propose?

N/A