

Number: WG36235



Llywodraeth Cymru
Welsh Government

Welsh Government
Consultation – summary of response

Clean Air Zone Framework for Wales

April 2019

Mae'r ddogfen yma hefyd ar gael yn Gymraeg.
This document is also available in Welsh.

OGL © Crown Copyright Digital ISBN 978-1-83876-032-8

Contents

Introduction	2
Methodology	3
Overview of responses	4
Summary of responses to individual consultation questions	
Question 1	7
Question 2	9
Question 3	11
Question 4	14
Question 5	16
Question 6	18
Question 7	19
Question 8	20
Question 9	21
Question 10	22
Question 11	25
Question 12	27
Question 13	29
Question 14	31
Question 15	32
Next steps	35
Annex A List of respondents	36

1.0 Introduction

1.1 In the 'UK plan for tackling roadside nitrogen dioxide concentrations 2017', the Welsh Government committed to consulting on a Clean Air Zone Framework for Wales. The Framework, it was stated, would set out how the Welsh Government will ensure the effective implementation of Clean Air Zones (CAZs) where evidence demonstrates they will bring about compliance before other measures and in the shortest possible time. The Framework would also provide an enduring impetus for actions to improve air quality over and above compliance thresholds.

1.2 The Welsh Government subsequently consulted on its draft Clean Air Zone Framework for Wales between 25 April and 19 June 2018.

1.3 The draft document set out the principles for the operation of CAZs in Wales. It also highlighted the expected approach to be taken by local authorities when implementing and operating a CAZ.

1.4 In simple terms, a Clean Air Zone was defined in the document as:

“A geographical target area where a range of co-ordinated actions are applied with the purpose of ensuring, in the soonest time possible, a significant reduction in public and environmental exposure to harmful airborne pollutants from all sources.”

1.5 The Clean Air Zone Framework for Wales is intended to guide and facilitate the establishment of CAZs by Local Authorities as a means of accelerating compliance where it is needed, helping to reduce pollution more widely, and embedding a level of consistency.

1.6 The Framework establishes:

- The definition of a CAZ.
- Under what circumstances a CAZ may be introduced.
- Key considerations for local authorities wishing to introduce a CAZ.

2.0 Methodology

2.1 The consultation asked 15 individual questions on the draft Framework. The majority were specifically about important aspects of how CAZs should be applied in Wales, such as the appropriate emissions standards, and the level of local authority flexibility in their application.

2.2 Further questions were asked about whether respondents felt CAZs would be effective, and whether they might have any effect on the Welsh language, either positively or negatively.

2.3 A final question enabled respondents to share any further comments they had not been able to share earlier in the questionnaire.

2.4 In addition to the consultation, the Wales Council for Voluntary Action hosted a webinar event enabling their members to hear more information from the Welsh Government about the proposals and to provide them with an opportunity to raise questions.

3.0 Overview of responses

3.1 The Welsh Government would like to thank all those who responded to the consultation and engaged in the webinar event.

3.2 In total, 69 responses were received to the consultation from a range of groups and individuals as detailed in Table 1.

For the full list of respondents see Annex 1.

Table 1 Breakdown of responses by respondent group

Respondent group	Number	Proportion (%)
Individual ¹	14	20
Non-governmental organisation ²	4	6
Business ³	15	22
Local authority ⁴	9	13
Other	27	39

3.3 The majority of respondents believed that CAZs would provide a means of improving air quality.

3.4 There was support for Welsh Government to mandate the introduction of CAZs although a number of respondents suggested this should only be done once all other potential measures had been exhausted.

3.5 The relationship between CAZs and the Local Air Quality Management (LAQM) regime was questioned, and some concern was raised about potential duplication and also competition for resources.

3.6 A number of respondents suggested that a CAZ should be required where an Air Quality Management Area (AQMA) has been declared.

3.7 The potential for negative impact on the haulage sector was raised, particularly in the context of the high price and relative unavailability of suitable vehicles to required emissions standards.

¹ Responding with personal views rather than as an official representative of a business/business association/other organisation.

² Responding in an official capacity as the representative of a non-governmental organisation/trade union/academic institution/other organisation.

³ In an official capacity representing the views of an individual business.

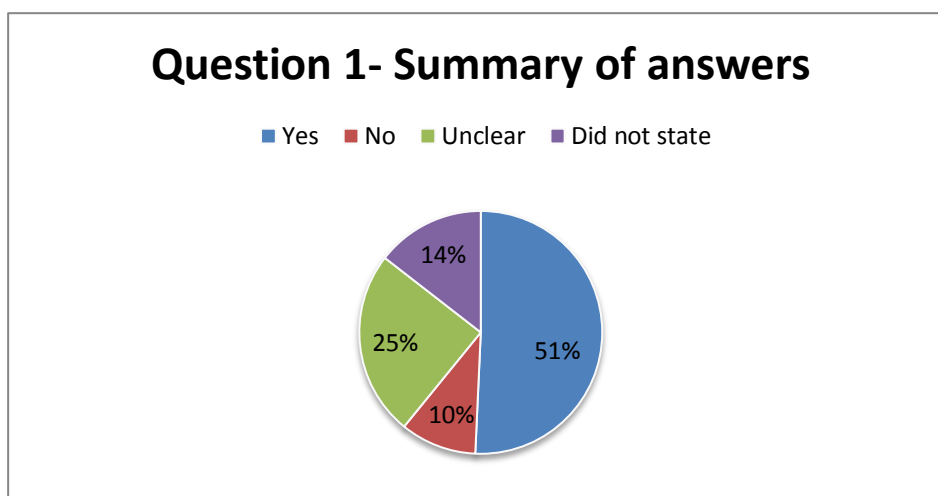
⁴ In an official capacity as the representative of a local authority.

- 3.8 Allowing for a reasonable lead-in time prior to the introduction of a CAZ was raised as an important consideration.
- 3.9 There was some disagreement about the level of evidence that should be required to make the case for a CAZ, with some respondents suggesting that this would cause unnecessary delay. Others recognised the need for independent evidence to support any requirement for a CAZ.
- 3.10 There was also a degree of disagreement over the proposed emissions standards, and the potential to tighten these over time. Some felt that a progressive tightening was contrary to the requirement to deliver improvements in the soonest possible time.
- 3.11 A commonly stated concern related to the potential for different schemes to apply in different areas, leading to potential confusion amongst road users. Some respondents, however, recognised the benefits of local authority flexibility to adjust CAZ requirements to reflect particular local problems. Others were concerned local authorities would simply choose less effective measures if able to do so.
- 3.12 Consistency with the English Framework was an advantage raised by some respondents as this would enable simpler travel between the two countries.
- 3.13 Of those respondents who gave a view on local authority flexibility in the setting of the timings that a CAZ would operate, the majority were in favour. Some pointed out any part time operation should be supported by evidence of air quality impact.
- 3.14 In terms of any potential to apply a part-charging model, around half of respondents were unclear about whether or not they supported this. Some respondents raised concerns about potential confusion, whilst others felt that a traffic ban would have the greatest negative impact economically and would penalise those unable to afford to upgrade their vehicles.
- 3.15 A clear majority of respondent's favoured national criteria for access charges, with several raising funds generated through this should be utilised to support active travel alternatives.
- 3.16 A number of respondents disagreed with some of the categories of vehicle/driver to be exempted from access restrictions. Any exemptions, it was felt by some, should be reviewed on a regular basis to ensure they were still valid.

- 3.17 Of those who gave their views, many felt insufficient consideration had been given to non-road sources of air pollution. A lack of advice on shipping, aviation and rail sources of pollution was cited. More advice on domestic burning was also requested by some.
- 3.18 The majority of respondents shared their thoughts on how information about a CAZ could best be made available. There was support for a national awareness-raising campaign. It was also recognised that local authorities would need to communicate not just with local residents but with those outside their authority boundaries also.
- 3.19 The potential to direct activity towards ensuring modal-shift to less harmful forms of transport was felt to be an important aspect of a CAZ.

Consultation Question Responses

Question 1 - Do you agree that Clean Air Zones (CAZs) would provide an effective way of addressing air quality in Wales?



Of the respondents who agreed, many felt CAZs could be an effective way of addressing air quality challenges as part of a wider strategy for a low-carbon economy.

Three of the respondents who disagreed felt implementing a CAZ could be expensive and disruptive. Others felt that CAZs would not help meet air quality challenges such as pollution from domestic heating, ammonia and nitrogen deposition.

One respondent felt the focus should be on encouraging national behaviour change to reduce the number of vehicles on the roads and not on small areas.

The need to focus on public health improvements over limit values featured in a number of responses.

One respondent suggested there should be a bold commitment to introducing charging CAZs and others supported the reinvestment of surplus revenue into public transport and active travel.

Two respondents suggested the Welsh Government should provide funding at the outset to support active travel and public transport options, particularly as income from a successful charging CAZ would reduce over time.

A number of respondents questioned whether CAZs would be more effective than Air Quality Management Areas (AQMAs). It was recommended analysis of the AQMA process should be carried out to avoid duplicating work and to avoid competition for resources between CAZ and AQMA processes. It was suggested the AQMA and CAZ processes should be harmonised

The need for detailed, evidenced based, plans for introducing a CAZ featured in a large number of responses. This could be in the form of feasibility studies or impact assessments to ensure the impact on communities and businesses had been rigorously assessed.

One respondent expressed concern that CAZs may disproportionately impact the poorest communities who cannot afford to upgrade their vehicles without support. However, another respondent suggested investment in public transport and active travel infrastructure would help to ensure disadvantaged communities were not disproportionately affected.

Three respondents recommended traffic access restrictions needed to be complemented by help and support for individuals and small, city centre businesses to move to cleaner forms of transport.

A number of responses raised concerns polluting traffic would simply be diverted elsewhere due to poor public transport infrastructure and insufficient through routes. It was recommended local authorities consider the potential effect of introducing a CAZ on neighbouring authorities.

One respondent felt most of Wales, including rural areas had been neglected in the Framework.

Multiple responses stated the South Wales Valleys would be an unsuitable region for a CAZ. It was suggested CAZ measures should be adapted to suit the region.

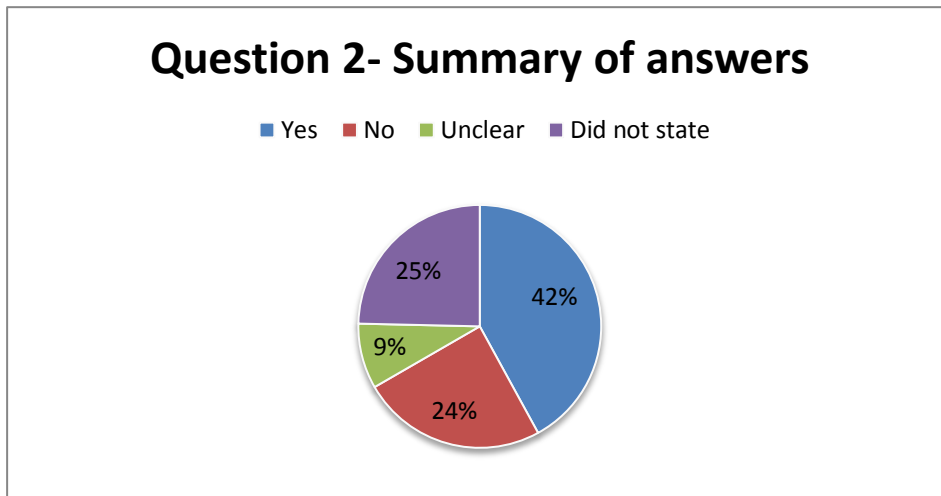
Two respondents noted the vehicle restrictions could impact the viability of businesses, particularly those in the road haulage sector. This is due to the limited availability of Euro VI vehicles.

One respondent felt the Framework leans towards electric vehicle based solutions with little reference to the investment required for the supporting infrastructure. Another respondent felt the Framework should give greater prominence to the health benefits of active travel over the promotion of electric vehicles.

A range of compliance options were suggested by two respondents, including fuel types and abatement technologies.

A number of respondents highlighted the need for sufficient time to allow for active travel infrastructure to be developed and for individuals and businesses to transition to cleaner vehicles.

Question 2 - Should Welsh Government direct local authorities to introduce a Clean Air Zone, and, if so, under what circumstances should it do so?



A large number of respondents stated the Welsh Government should mandate CAZs, particularly within existing AQMAs.

One respondent felt failure to mandate CAZs would lead to excess mortality and additional cost to the NHS as air quality improvements would not be reached in the soonest possible time.

Health impact assessments would be useful to link the potential health gain of different intervention scenarios.

Two respondents felt with a direction, local authorities may adopt less effective measures.

A large number of respondents felt a CAZ should only be mandated after all other measures have been exhausted and local authority proposals are deemed to be insufficient with due weight given to local traffic, planning and social issues.

One respondent suggested a larger CAZ area (as compared to an AQMA) would minimise the potential for pollution displacement.

Three respondents suggested the Welsh Government should set the trigger level in addition to minimum criteria regarding the location and emissions standards of a CAZ. This would ensure a CAZ is located in the most appropriate areas and as effective as possible.

A number of respondents suggested the Welsh Government should develop strict guidelines and decision making criteria to support local authorities. These guidelines

should also set out when it would be appropriate to direct the implementation of a CAZ.

It was noted local knowledge is key to improving air quality and local authorities are best placed to work with communities to develop options.

One respondent suggested any Direction should first require a feasibility study to be undertaken. Another respondent recommended the evidence to support the requirement for a CAZ should be developed impartially and not within the local authorities themselves.

Conversely, it was suggested local authorities should be directed to introduce a CAZ without feasibility studies as are they are time-consuming. This means people continue to experience poor air quality whilst it is being carried out.

A number of responses highlighted a lack of funding and resources would prevent local authorities to take action and provide solutions to AQMA issues. It was suggested the Welsh Government should make funding available to assist local authorities to invest in solutions.

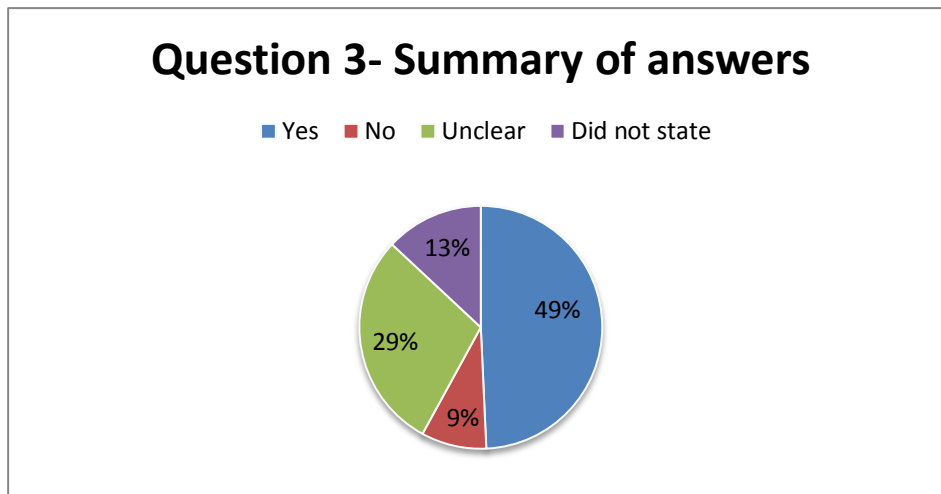
One respondent suggested measures should be applied against all sources of emissions to ensure a proportionate approach. However, another respondent suggested charges should only be levied against the drivers of the most polluting vehicles.

One respondent felt measures should focus on avoiding congestion caused by cars and vans. CAZ restrictions should not be placed on lorries and buses because they provide essential transport services for people and freight.

One respondent asked if the CAZ Framework could be linked to the Freight Strategy that was currently being reviewed.

Another respondent questioned whether the environmental impact of scrapping vehicles, and creating new ones, had been factored into the analysis of emissions improvements.

Question 3 - Do you consider the options/advice at section 5 to be suitable and effective elements of a CAZ?



Three respondents highlighted local authorities will need to consider the effects of measures they take on neighbouring authorities and surrounding areas.

One respondent felt the options were not effective enough. Another respondent recommended guidance should be provided to local authorities to outline the most effective measures of reducing pollutants within a CAZ. Some of these measures should be implemented and funded at a national level to maximise gains and to ensure consistency. The measures should be weighted to ensure every CAZ capitalises on the combination of elements most likely to deliver improvements.

A number of respondents suggested local authorities and the Welsh Government should lead by example in ensuring their own fleets are clean through the procurement of ULEVs.

Traffic management

Many responses featured traffic management measures with a particular focus on speed humps and 20mph speed restrictions. Some respondents favoured the removal of speed humps, or a change to speed cushions, to reduce emissions from heavy braking and acceleration. Other respondents felt traffic calming measures should remain for road safety purposes as this helps to encourage people to walk and cycle.

One respondent did not support the pedestrianisation of roads to meet air quality targets due to adverse effects on those with restricted mobility.

A number of responses highlighted the use of technology, such as electronic variable message signs to alert drivers of poor air quality and bus green filter traffic signals to maximise vehicle flow.

It was suggested park and rides should form part of a wider parking strategy across local authority boundaries and must offer more efficient, cheaper and/or quicker alternatives to driving a private car.

One respondent highlighted residential parking in new developments should be limited, particularly in the centres of towns and cities. Additionally, there should be dedicated car club parking bays outside train and bus stations. Another respondent suggested sufficient EV charging points should be a condition of approval for any new car park planning applications.

EV/ULEV

Many responses featured comments on electric vehicles (EVs) and ultra low emissions vehicles (ULEVs). A number of respondents felt incentivisation such as dedicated free parking/loading bays and taxi ranks with EV charging could encourage take up. Charging points should be affordable, accessible and located near to public transport locations.

It was recommended the Low Emission Bus Scheme or Welsh Government Mutual Investment Model could be utilised to secure compliance and should be strategically allocated instead of using a competitive bidding process. It was also suggested by three respondents that licensing regulations could be used to require only the cleanest taxi vehicles and a grant scheme would help to support this and retrofitting.

Some respondents highlighted EVs and ULEVs still contribute to congestion and generate particulate matter (PM) from tyre and break wear. There was also opposition against reopening pedestrianized routes to ULEVs due to the air pollution increases this would bring. A blanket ban against parking on pavements was supported by a number of respondents as this can deter walking.

Many respondents suggested EV/ULEV infrastructure should not take space away from footpaths or bus lanes, or make walking and cycling less safe. This would act against the spirit of encouraging active travel.

One respondent suggested Wales should lead on hydrogen-powered transport.

Behaviour change/modal shift

A number of respondents suggested there should be a greater focus on achieving public health improvements with an emphasis on achieving this through walking,

cycling and public transport. It was noted improved public transport infrastructure would be required.

Further suggestions were made such as a smart-ticketing system to enable easier travel across Wales, making bike racks on taxis a condition of licensing, investment in protected cycle paths in urban areas, and a scrappage scheme that provides public transport tickets or an e-bike loan.

Schools

A number of the responses featured suggestions on how to relieve congestion associated with the travel to schools. These included free school public transport, later school start times, and equipping local authorities to deal with school journeys, such as a policy framework and targeted active travel initiatives.

Working patterns

There was support for developing plans to reduce employee travel impacts, such as improved digital infrastructure to facilitate home working. It was also suggested the Framework should introduce charges for workplace parking, with the revenue being used for active and public transport schemes.

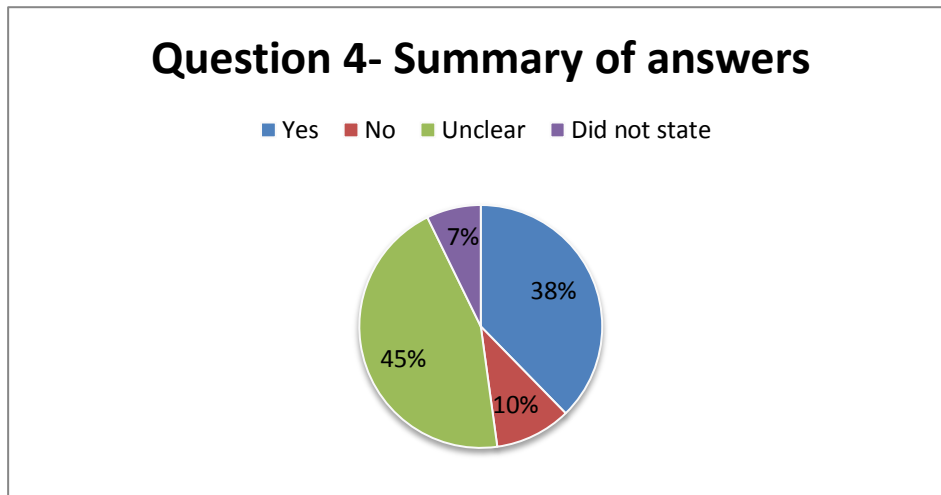
Other emissions

It was suggested by one respondent that in areas where industrial emissions contribute to poor air quality, they should be included in local CAZ measures. There was support for using EU legislation on Non-Road Mobile Machinery (NRMM) as the basis for setting requirements on emissions, with acknowledgement that businesses should be given sufficient time to acquire new machinery. Additionally, exhaust emissions from construction equipment should be modelled and the Framework should reflect the range of different standards applied to construction equipment engine types. One respondent also felt the Framework should set out how Environmental Permitting would be treated within a CAZ.

Green infrastructure

One respondent felt green infrastructure should be considered as a major strategy in the Framework to assist with pollution mitigation and delivery of health and well-being objectives. Another respondent suggested that the Framework should include a requirement on developers to incorporate green infrastructure into developments. It was also suggested green infrastructure should be used to separate people from traffic pollution, particularly in urban areas

Question 4 - Do you agree that the minimum emissions standards outlined in Annex 2 of the CAZ Framework should be applied to determine road vehicle access in Welsh CAZs, and that these standards should be tightened over time in order to apply more rigorous real-world emissions data?



Agree

The majority of respondents who directly answered the question supported the principle CAZs should only admit the least polluting vehicles, with standards being tightened over time. Additionally, consistency of minimum emissions standards between Wales, Scotland and England was supported by a number of respondents.

Disagree

Of the respondents who disagreed, one felt the proposal to tighten standards over time is at odds with the requirement to deliver an improvement in the soonest time possible. Two respondents felt standards should remain in place and should only be tightened where sufficient progress has not been made.

A number of respondents highlighted the minimum emissions standards would not improve poor air quality caused by congestion.

Further comments

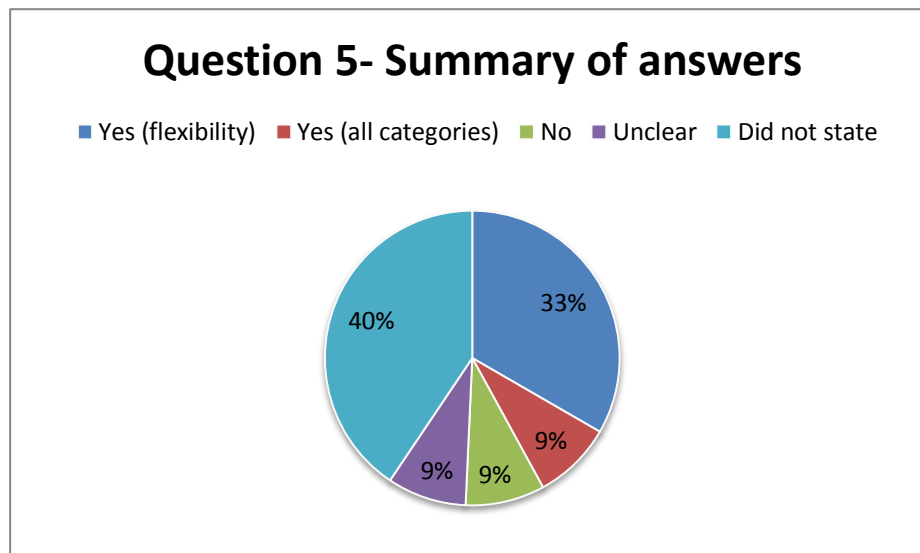
It was recommended by four respondents the Framework should outline a contingency plan. This is in case a feasibility study indicates the air quality will remain poor even if the majority of the traffic fleet complies with the standards.

One respondent asked for a guarantee that no business or individual who has purchased a vehicle adhering to the highest emissions standards would be subject to

a CAZ charge if standards are changed within 3 years of the vehicle's first purchase. It was also highlighted by a respondent that small firms may be disproportionately affected by the cost of vehicles meeting the standard.

One respondent felt a Euro 4 standard for motorcycles was too high as this standard only applied from 2016/7. Another respondent thought motorcycles should be seen as part of the solution rather than a problem as they contribute less to road congestion.

Question 5 - Do you agree that Local Authorities should have flexibility to target only those vehicles that may be presenting the biggest air pollution problems locally, or should access restrictions apply to all categories of vehicle, wherever CAZs may be introduced in Wales?



Four respondents agreed local authorities should have flexibility as air quality challenges will differ between areas. Two respondents suggested source apportionment modelling should be used to design the most effective CAZ model for the area.

A large number of respondents disagreed as they felt different rules between areas could be confusing for drivers and commercial operators. It may also lead to some areas feeling disadvantaged by the restrictions. A large number of respondents believed all, or at least a high proportion, of the most polluting vehicles should be restricted, with a particular focus on private cars and vans to achieve the maximum air quality improvements.

One respondent suggested local authorities should be able to implement the most appropriate restrictions within a uniform national emissions standards framework. This would ensure drivers were clear on requirements for a CAZ.

Another respondent highlighted consistency with the English CAZ Framework would help businesses who travel between the two countries.

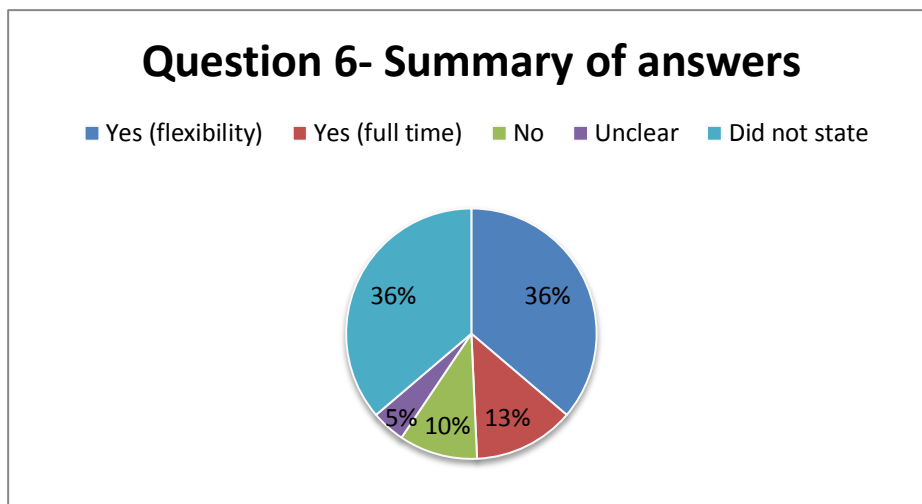
Three respondents suggested more should be done to reduce the number of fleet movements and deliveries in an area.

As construction sites are time-limited, one respondent felt it should be clear what benefits are expected to arise from any restrictions applied to Non-Road Mobile Machinery.

Four respondents felt the benefits of public transport should be promoted before car drivers are charged. Incentives for low emission or electric buses would also be welcomed.

One respondent highlighted driver behaviour also has an impact on air quality.

Question 6 - Should local authorities have the flexibility to vary the times that CAZ restrictions should operate, or would full-time operation provide the most desirable solution in terms of meeting air quality challenges?



There was some support for flexible operation as the CAZ could be tailored to meet times of poor quality. It was suggested part time operation could reduce congestion at peak times and the level of charges could be varied throughout the day to support this. It was advised if flexible times were implemented, a public information campaign would need to be implemented to inform drivers of the time.

Conversely, it was felt by a number of respondents that full-time, 24 hour operation would be the most effective way of tackling air pollution. This would reduce the chance of confusion and any fines/charges as a result.

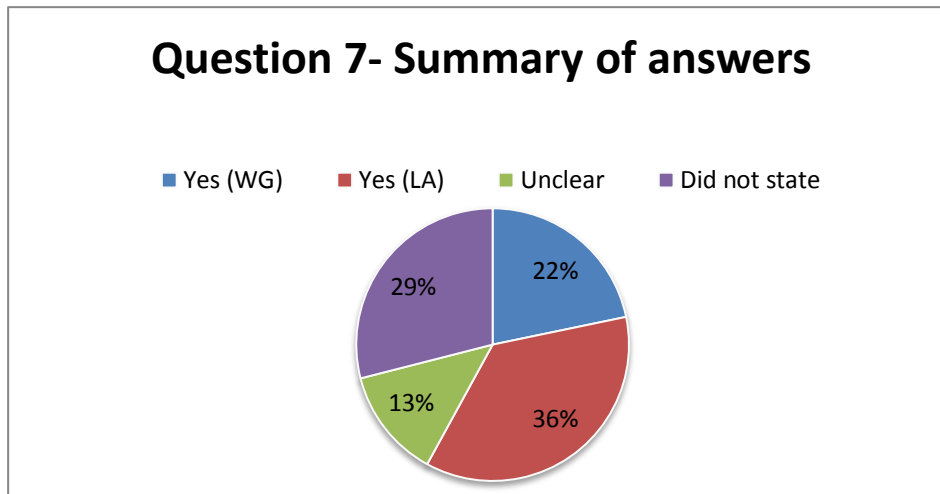
Other respondents suggested any flexibility would need to be evidenced by air quality impact. One respondent recommended the hours of operation should be designed to maximise air quality improvements and minimise the risk of displacement to other areas or times of day.

It was highlighted it is the responsibility of Welsh Ministers to ensure a CAZ operates in a way that meets the ClientEarth legal tests.

Five respondents felt flexible operation could be difficult to enforce and may lead to traffic spikes immediately outside restricted times with added congestion as a result.

A number of respondents suggested local authorities could incentivise fleets to make collections and deliveries at off-peak times. However, some respondents felt this may not be practical and may increase night time road noise.

Question 7 - Should Welsh Government consider options for mandating either a charging or a non-charging CAZ structure in Wales, or should this be left to local authority determination depending on evidence of which of the two may be the most effective means of reducing airborne pollution locally?



A number of responses supported mandatory charging CAZs as it was felt this would bring around compliance with the legal limits in the shortest possible time.

There was also support for the revenue generated to be invested in active travel. Two respondents suggested charging CAZ proposals should be accompanied by detailed information on how revenue will be used.

One respondent raised concerns that failure to direct local authorities to introduce a charging CAZ could lead to local authorities choosing less effective measures.

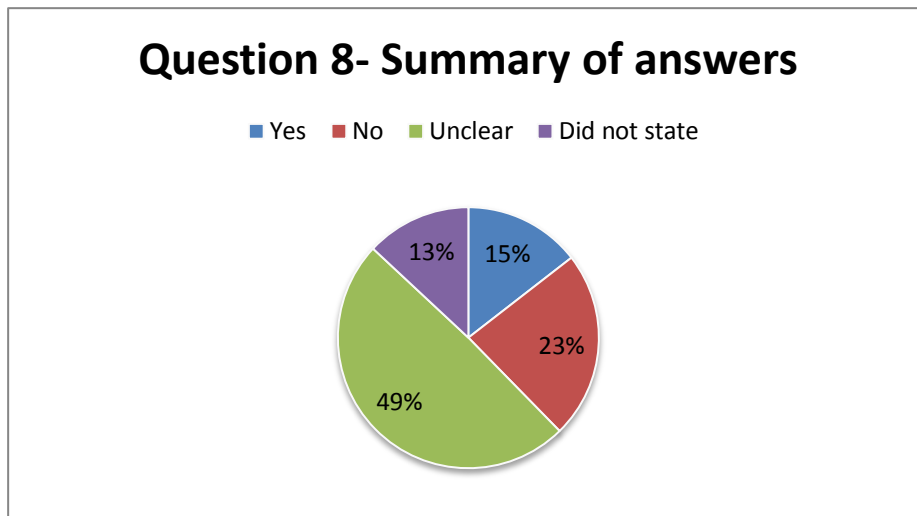
Six respondents supported a CAZ being implemented in the most polluted areas and where an AQMA exists.

A large number of respondents suggested the Welsh Government should produce guidance detailing national charges to provide consistency across local authorities. This would help to avoid confusion for drivers.

Three respondents felt CAZs should be left to local authorities to determine the best option for the area. One respondent noted for areas with no alternative modes of transport, people would continue to drive and use other routes to avoid the charges, thereby displacing pollution.

Three respondents called for the decision to introduce a charging or non-charging CAZ to be made based on evidence, including robust air quality assessments and socio-economic analysis. This is so the most effective option that produces results in the shortest possible time should be implemented.

Question 8 - Would a part-charging model bring any benefits over the alternatives of a total ban on non-compliant vehicles, or a charging system with full coverage within the CAZ?



A number of respondents welcomed the part-charging model as a means to support phasing-in of a charging mode. This could assist local authorities in developing an approach that tackles specific issues.

One respondent felt a part-charging model would give private drivers more time to adapt and another respondent felt a part-charging model would support operators who are close to being compliant.

Six respondents suggested a mixed model of charging has the potential to generate confusion which could reduce the effectiveness of a CAZ.

One respondent stated choosing a charging CAZ over a ban penalises those who live in the area, while enabling non-compliant vehicles to continue to be driven in the area.

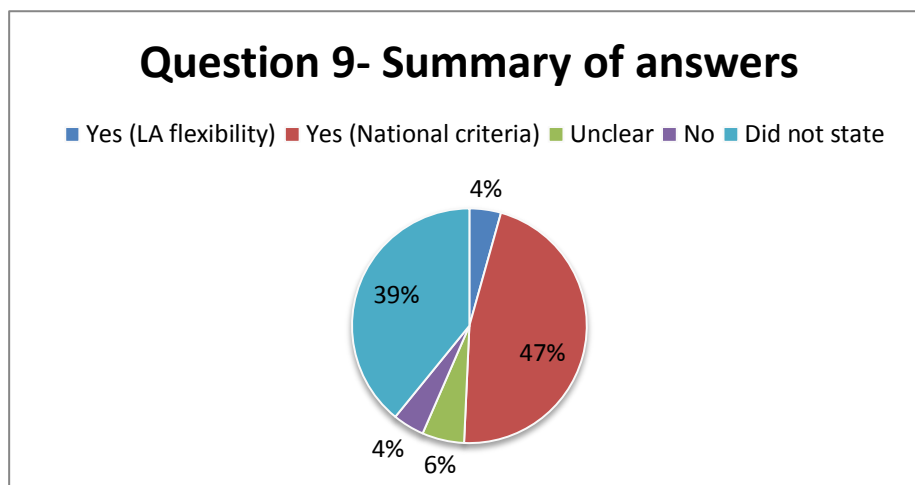
Two respondents supported a total ban of non-compliant vehicles, while one respondent felt traffic bans should only be applied to the very smallest and most seriously affected areas.

Three respondents suggested a total ban would have the most significant impact on economic activity and could mean businesses are unable to access certain areas of a CAZ.

One respondent felt a charging scheme was preferable to a complete ban on non-compliant vehicles as drivers who cannot afford to upgrade their vehicles will be disproportionately affected.

Three respondents recommended the decision should be left to local authorities to decide which model is most appropriate.

Question 9 - Should local authorities have full flexibility to determine the level of any access charges they may apply, or should Welsh Government establish national criteria for local authorities to refer to?



A number of respondents welcomed national criteria in order to provide consistency and avoid confusion for individuals and businesses. Four respondents highlighted without national charge rates, local populations may question why the cost of remedying pollution has a different value placed on it across Wales.

Three respondents suggested the national criteria should be based on health impact data and damage cost analysis. It was also suggested a national criteria would ensure costs of driving are equal and do not disadvantage particular areas. Another respondent felt the criteria should be national as it is the responsibility of the Welsh Government to ensure adopted measures achieve compliance.

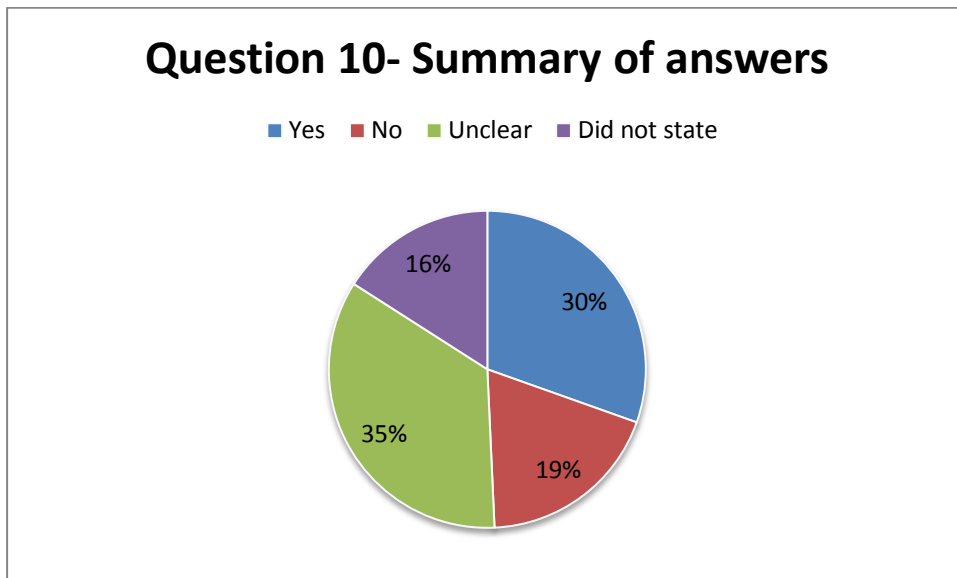
Six respondents suggested national criteria should set out that any surplus revenue from charging and this should be ring-fenced for air quality and active travel improvements.

One respondent recommended the frequency of charging should be outlined in the Framework. Three respondents supported a single charge per day, per vehicle to reduce administrative costs. The Framework should also include information about how and when a CAZ would be removed.

One respondent suggested drivers should not be penalised excessively due to where they live.

Another respondent highlighted discounts to businesses based within a CAZ could be unfair to those outside the zone.

Question 10 - Do you agree with the proposed vehicles and categories of drivers that should be exempt from meeting published access requirements within a CAZ?



There was support for categories listed, although one respondent felt the list was too large.

Two respondents suggested the exemptions should be time limited to promote take up of compliant vehicles.

One respondent felt the impact on public health should be the only consideration when determining exemptions. It was also suggested measures to abate vehicle emissions will provide fewer public health benefits than measures to increase sustainable transport.

Impact of categories on blue badge holders and health and social care providers

One respondent noted there was the potential for a CAZ to disproportionately affect people with disabilities and long term conditions from low-income backgrounds who are unable to upgrade their vehicles.

Another respondent suggested social providers who have their travel costs reimbursed and blue badge holders requiring a specialist vehicle should be included. Residents in a CAZ should be given a sunset period for compliance. Blue badge holders requiring a specialist vehicle could be exempted through the specialist vehicle exemption.

Impact of categories on residents

The importance of addressing local residents' concerns about being penalised for where they live was highlighted by a number of respondents. Two respondents suggested local authorities should have some flexibility in avoiding penalising residents.

One respondent asked for greater clarity on the proposed sunset period and suggested residents should not be exempted as they are the most likely to have access to other modes of transport.

Impact of categories on businesses

A number of responses highlighted potential impacts on businesses. One respondent suggested a degree of flexibility was required to help businesses most affected, potentially through a discount or a sunset period with exemptions reviewed annually. Another respondent suggested short term hardship exemptions should be applied where it can be demonstrated the cost of upgrading vehicles would lead to a business closing.

An additional exemption was sought for vehicles delivering a universal service (such as mail carriers) and for breakdown/recovery. It was also suggested that range extended vehicles with geo-fencing technology should be exempt.

The low availability and cost of compliant vehicles was a concern raised by some respondents.

Ultra low emissions vehicles

One respondent suggested only zero emissions vehicles should be exempt. Two other respondents felt ULEVs should not be exempted as they generate harmful particular matter.

Further clarification was suggested regarding ULEVs so only those vehicles eligible for the Plug-in Vehicles Grants are included and not 'mild' hybrids.

Autogas (LPG) and converted/retrofitted vehicles

One respondent suggested LPG vehicles should be accredited to ensure they meet the minimum emissions criteria. Two respondents felt retrofitting is not a viable option for replacing entire fleets due to expense and availability of technology.

Historic vehicles

One respondent suggested historic vehicles should not be considered as a means of transportation because their use tends to be limited to travel to cultural events and shows, and their usage at times of congestion is rare.

The same respondent thought upgrading engines in historic vehicles would remove their cultural and heritage value. Therefore, the qualification “historic vehicles that cannot be upgraded to meet emissions standards” should be removed from the Framework. Another respondent questioned how the determination of whether a historic vehicle can or cannot be upgraded would be made.

Conversely, two respondents believed any historic and specialist vehicles that cannot be upgraded should not be exempt as they were felt to be some of the most polluting vehicles.

Public service vehicles

One respondent felt public bodies should be setting an example with their own fleets. Three respondents suggested that refuse, community and school transport vehicles should not be exempt indefinitely and the Welsh Government should provide support to upgrade these fleets. Another respondent noted local authorities' currently operate vehicle fleets that are not Euro VI compliant. Providing exemptions for those would be discriminatory against private operators.

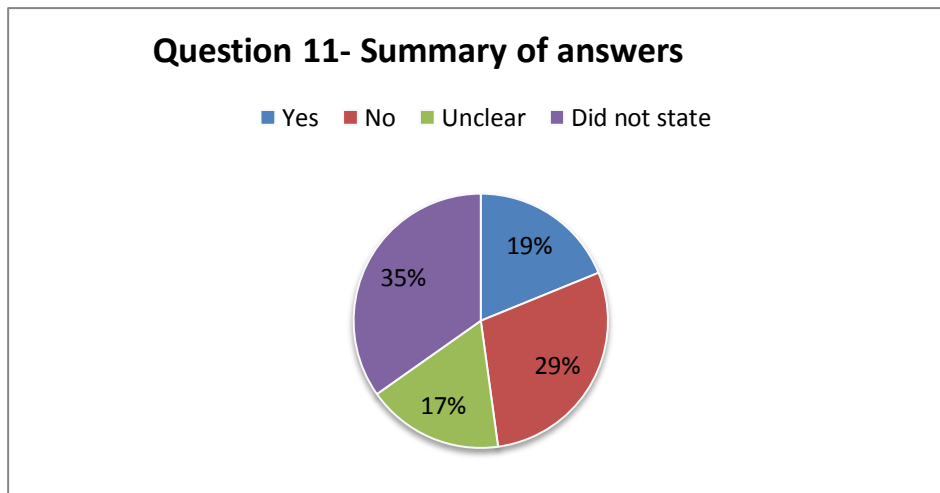
Motorbikes

Two respondents suggested motorbikes and scooters should be exempt due to their lower emissions.

Implementing exemptions

One respondent suggested feasibility studies could demonstrate the impact exemptions would have on achieving compliance. Another respondent highlighted the process of registering for an exemption would need to be clear and accessible to all.

Question 11 - Do you think sufficient consideration has been given to non-road sources of air pollution in the Framework?



One respondent stated it was vital to keep the main focus on traffic.

It was suggested by another respondent that complementary treatment of both road and non-road sources of pollution should be applied.

One respondent who answered no to this question felt non-road sources are conflated with non-road mobile machinery (NRMM). The respondent also highlighted there is also no mention of shipping, aviation or rail freight pollution.

It was suggested more information should be provided on wider sources of air pollution, accompanied by proposals for engagement to help industry and consumers understand the issues.

Twelve respondents highlighted more research and specific proposals are required for domestic and commercial emissions, with a particular focus on wood burning.

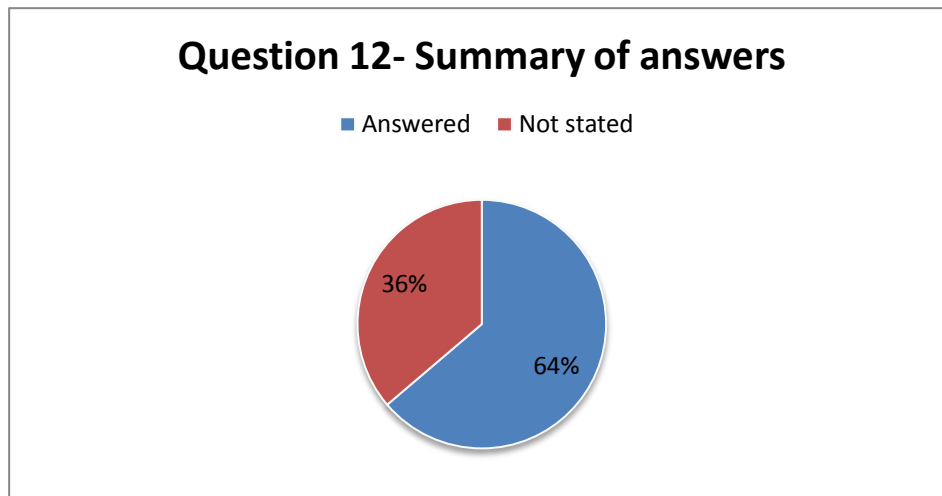
One respondent suggested there should be more emphasis on the decarbonisation of heat and efficiency improvements for domestic, commercial and industrial buildings. Another respondent suggested a boiler scrappage scheme would help.

Further investigation into a number of non-road sources was suggested such as adapting smoke control zones, measures to reduce ammonia from agriculture, measuring the impact of spraying herbicides in public areas and assessing the impact of biomass power stations on air quality.

One respondent suggested there are opportunities for cleaner machinery through the use of Liquid Petroleum Gas for generators and fork-lift trucks.

Another respondent suggested appropriate standards should be developed for other significant sources of pollution such as NRMM, domestic and commercial boilers and combined heat and power (CHP) units.

Question 12 - How best should information about a CAZ be made publicly available in order to ensure the clearest and widest possible notice of what access restrictions will mean to those travelling within the area?



One respondent suggested the minimum information required would include an explanation of a CAZ and why it is required; where it will operate with visual map; when it is in operation; emissions standards applicable for each vehicle class and how to find this information out; charges and payment information; and methods of enforcement and penalties.

Another respondent recommended a common charging and payment platform should be created by the Welsh Government.

Method of communication

A number of respondents suggested there should be a pan-Wales, ongoing national awareness campaign in with input from Public Health Wales and third sector organisations to communicate the health, social and economic impacts of air pollution. The campaign should encourage people to reduce their car use and to promote public transport and active travel alternatives. The information should be tailored to different audiences and those groups vulnerable to air pollution in particular should be made aware of measures they can take to protect themselves.

There were recommendations to advertise on buses, television, local and national newspapers, community newsletters and in public locations. Social media was highlighted as a useful communication tool in many responses. It was suggested a combination of social media and traditional mail communications may be useful to give tailored messages to residents and businesses within a CAZ.

Eight respondents recommended local authorities, transport associations and the Welsh Government produce press releases and information on their websites

regarding the rules of a CAZ. Four respondents suggested work should be undertaken with satnav providers so drivers can be easily informed of a CAZ or AQMA on their route.

Physical signs would be required at the boundaries of a CAZ and along major access routes showing alternative routes and alternative methods of travel. For example, the signs could provide real-time parking and park and ride information. Large format, digital displays networked into traffic signalling systems were also recommended.

Regional communication

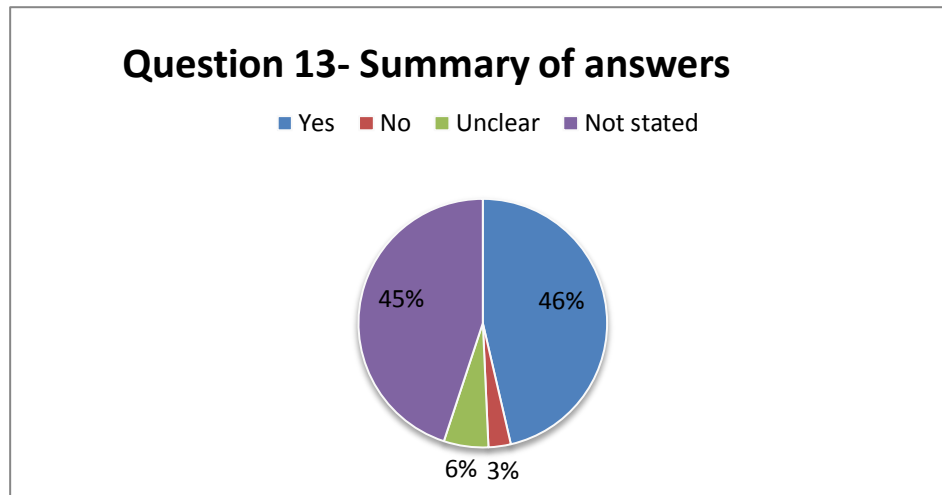
One respondent highlighted local authorities would need to communicate with communities affected outside their boundaries. Another respondent suggested a wider regional communications strategy may be needed where there is a high volume of inbound traffic from neighbouring authorities.

Fleet operator/business specific communications

Three respondents recommended local authorities should work closely with fleet operators and the motoring industry more generally. One respondent recommended keeping vehicle manufacturers well informed would enable companies to inform the public, through dealerships, about the transition away from internal combustion engines. Another respondent recommended the Welsh Government considers a vehicle certification to help drivers and fleet managers ensure they are making the best choices when purchasing vehicles.

Five respondents noted the need for a suitable lead-in time for any enforcement measures to ensure businesses are able to make any necessary adjustments.

Question 13 - Do you have any views on how the impact/success of a CAZ should be measured, and how this information should be used to develop a local CAZ over time to ensure the widest ongoing possible benefits for air quality?



Air quality monitoring

Many respondents felt success would be a reduction in pollutants to within legal limits. There was also significant support for funding being made available for a combination of real-time and passive monitoring to demonstrate air quality impact. Three respondents suggested monitoring should take place along active travel routes and public sites such as schools. It was also suggested the public should have access to monitoring information so they can see how pollution levels are changing.

Four respondents called for immediate improvements to air quality monitoring in order to be able to assess the impact of a CAZ. One of these respondents highlighted additional monitoring should not delay the introduction of measures where non-compliance has been identified.

Transport surveys/traffic counts

A number of respondents recommended transport surveys and traffic counts in addition to air quality monitoring would demonstrate any reduction in vehicle numbers and modal-shift that occurs as a result of a CAZ. Commuting and school run journeys in particular could be measured.

Public health improvements

Three respondents suggested the effectiveness of a CAZ should be measured in public health improvements. It was further suggested the location and placement of

air quality monitoring should be determined on a human exposure based approach rather than a transport planning based approach.

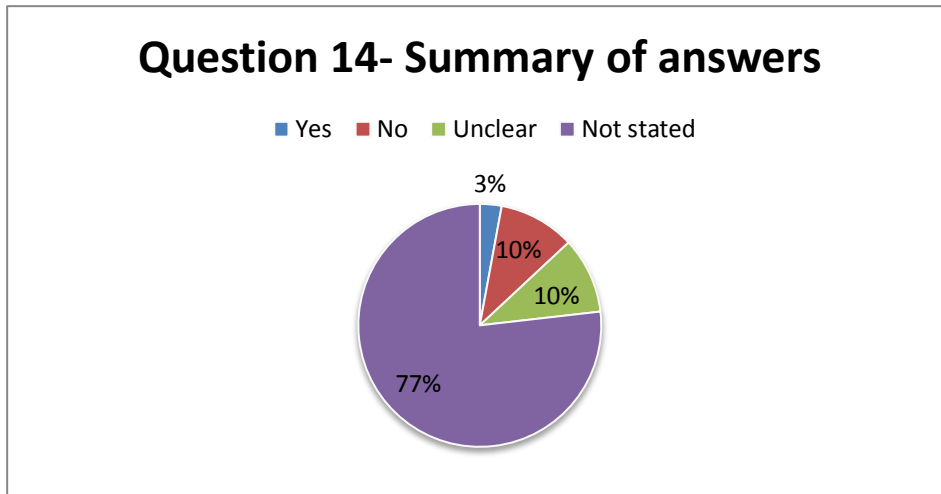
Economic measures

A range of economic measures were suggested by two respondents, such as the cost of maintaining a CAZ; revenue generated; affect on the economy of the area and change in business start ups/closures, particularly in the tourism industry.

Within the Framework

Three respondents suggested guidance for evaluation should be provided in the Framework. A further three respondents recommended the evaluation guidance should include assessments to measure any unforeseen circumstances which could be used to see whether restrictions need to be tightened or loosened over time. Two respondents recommended CAZ monitoring could be incorporated in to the annual LAQM reporting structure.

Question 14 - Could the advice in the draft Framework have any positive or adverse effects on the Welsh language, and how could the document increase the former/mitigate the latter?



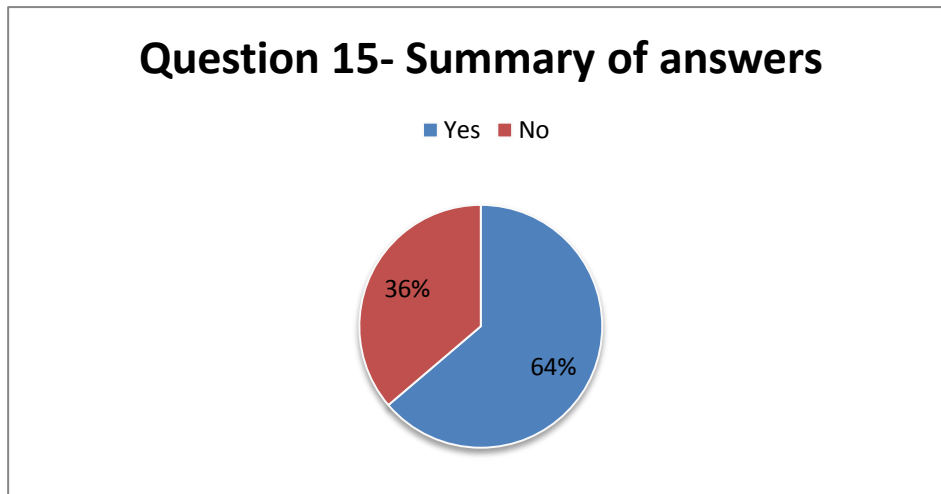
Five respondents highlighted the need for the Framework, any CAZ communications and road signage to be bilingual.

Three respondents advised electronic road signs only give drivers a short time to read notices, investigation is needed into how best to convey CAZ messaging on electronic signs.

One respondent suggested the language of other communities should also be recognised.

Another respondent highlighted a CAZ could bring outside interest to the area which may provide greater exposure for the language.

Question 15 - Do you wish to make any further comments about the Clean Air Zone Framework for Wales?



A number of respondents asked for Wales, Scotland and England to work together to develop a UK wide CAZ Framework to make it easier for drivers to understand the rules.

Three respondents stated a CAZ must be designed to achieve modal-shift so walking and cycling are the default for daily journeys. Four respondents felt the car will remain the most convenient choice until public transport is improved.

One respondent suggested medium to long-term travel objectives should not be compromised in the rush to put measures in place in the soonest time possible. For example, it was noted park and ride facilities will still encourage some level of car use.

Five respondents called for designated anti-engine idling zones with penalties at sensitive locations such as schools, colleges, hospitals and large entertainment venues. Another respondent suggested the boundaries of a CAZ should include public buildings and high-density housing areas that would be vulnerable to traffic displacement.

It was suggested by two respondents the Framework should set out a model for local authorities to apply, including minimum criteria for the location and size of CAZs and associated cameras. It was also suggested the Framework should contain more detail surrounding EV charging infrastructure implementation.

The potential for non-payment of CAZ charges was raised by one respondent. Powers to increase charges for late payment and to issue a court summons would be needed.

Four respondents suggested the Framework should outline how it is linked with other legislation and relevant policy areas such as Local Transport Plans, Local and Strategic Development Plans, Freight Strategies, Planning Policy Wales, Area Statements and permitting assessments.

One respondent felt too many CAZ decisions have been delegated to local authorities and the Welsh Government should clarify its role in developing CAZs in line with the Garnham legal tests.

One respondent requested further information on noise and an analysis of whether the noisiest areas are also those with the highest air pollution concentrations.

A ban of non-smokeless fuels and unseasoned wood was called for by one respondent in addition to support for cleaner fuels for heating. Another respondent highlighted house coal is one of the cheapest fuels to buy and restricting its use could exacerbate fuel poverty. It was also suggested low emission heating systems should be considered more in the Framework.

One respondent has been developing a facility to deliver mail by e-bike and trailer within towns and cities. This requires a staging area with storage, e-bike/tricycle parking and charging facilities and finding space for such a facility within towns and cities has been difficult. It was recommended companies developing innovative methods like this should be supported due to the vehicles it could take off the road within some of the most polluted areas.

Local authorities should, in the view of one respondent, make funding available for night time simultaneous charging infrastructure which would support small businesses take up electric vehicles.

It was highlighted by one respondent that actions to reduce one pollutant should not increase another.

One respondent stated businesses should not be penalised for investing in diesel vehicles when the Government originally supported take-up for environmental reasons. Another respondent suggested Euro V should be used as the standard for HGVs until 2024, thereby allowing sufficient time for operators to upgrade their fleets. A charge of £100 was suggested for pre-Euro V vehicles and a charge of between £0-£10 for Euro V in the meantime.

It was suggested by one respondent that CAZs should address both AQMA non-compliance as well as non-compliance with the limit values. It was also suggested CAZs should take into account local monitoring and not concentrate purely on modelled exceedances. This is so a CAZ can include roads which local assessment indicates will be in exceedance, even if the national model does not.

A list of criteria to be used when assigning a CAZ based on requirements for health improvements was suggested by one respondent.

Two respondents suggested supplementary planning guidance would be useful to manage the impact of a CAZ on proposed developments.

One respondent felt the consultation wasn't very user friendly and many of the questions were difficult for the lay person to answer.

Next steps

The Welsh Government would like to thank all who responded to the consultation. We are analysing and considering all responses in the process of drafting the final Clean Air Zone Framework for Wales.

Based on the comments and suggestions from the consultation, a number of revisions will be made to the document. We are involving a number of consultation respondents and other stakeholders in the development of the final Framework.

The final Framework is expected to be published spring 2019.

Annex A

List of respondents

This list does not include respondents who wished to remain anonymous.

- Peter Donnelly
- Keep Wales Tidy
- Swansea Friends of the Earth
- Doosan Babcock
- National Association of Wedding Car Professionals
- Institute of Civil Engineers Wales
- Calor Gas Ltd
- Living Streets
- Ian Raymond
- Royal College of Physicians
- Road Haulage Association
- Autogas Ltd
- Caerphilly County Borough Council
- Centrica
- Cardiff Friends of the Earth
- Campaign for the Protection of Rural Wales, Brecon and Radnor
- Federation of Historic Vehicle Clubs
- Healthy Air Cymru
- Public Health Wales
- Torfaen County Borough Council
- Blaenau Gwent County Borough Council
- Society of Motor Manufacturers & Traders Ltd
- CPL Industries
- UPS
- UK Construction Equipment Association
- Disability Wales
- The Builders Merchants' Federation Ltd
- Toyota
- Wales Heads of Environmental Health
- RAC Foundation
- Pembrokeshire County Council
- FSB Wales
- Cardiff Council Transport Policy
- Valero Pembroke Refinery
- British Heart Foundation Cymru
- Welsh Air Quality Forum

- UKLPG
- Client Earth
- Enterprise Holdings
- Freight Transport Association
- Chartered Institute of Environmental Health
- Natural Resources Wales
- Woodland Trust
- Dan Allsobrook
- HETAS
- Owain Dafydd Morgan
- John Charles
- Anonymous
- RAC Motoring Services
- Matt Taylor
- City and County of Swansea Council
- Rhondda Cynon Taf County Borough Council (Public Health Protection)
- ABB
- Mark Andrew Tappin
- Associated British Ports
- British Vehicle Renting & Leasing Association
- Motorcycle Action Group