

WELSH GOVERNMENT INTEGRATED IMPACT ASSESSMENT

Title of proposal:	Clean Air Plan
Official(s) completing the Integrated Impact Assessment (name(s) and name of team):	David Thornley Kenn Palmer Air Quality Noise and Chemicals Branch
Department:	ESNR
Head of Division/SRO (name):	Gian Marco Currado
Cabinet Secretary/Minister responsible:	Lesley Griffiths, Minister for Environment, Energy and Rural Affairs
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SECTION 1. WHAT ACTION IS THE WELSH GOVERNMENT CONSIDERING AND WHY?

In narrative form, please describe the issue and the action proposed by the Welsh Government. How have you applied / will you apply the five ways of working in the Well-being of Future Generations (Wales) Act 2015 to the proposed action, throughout the policy and delivery cycle?

AIMS

The aim of the Clean Air Plan for Wales is to improve air quality and in doing so reduce the burden of poor air quality on human health and the natural environment in Wales, and contribute to improved air quality in the UK and Europe.

The Plan:

- sets out how we will work collaboratively across Government and sectors to reduce air pollution to support public health and the natural environment;
- explains how air quality policy aligns with wider Welsh Government policy and explains the priorities and principles we will apply in delivering the Plan; and
- provides context about current air quality management frameworks in Wales, the challenges we face and what we mean by clean air.

In delivering the Plan we will ensure that the actions provide the flexibility to mitigate any adverse effects arising from climate change on air quality.

The Clean Air Plan for Wales:

- provides context about what we mean by clean air, current air quality management frameworks in Wales and the challenges we face;
- explains the priorities and principles we will apply in delivering the Plan;
- sets out how we will work collaboratively across Government, both national and local, with the business, voluntary, community sectors and the public to reduce air pollution to support public health and natural environment improvements;
- demonstrates how we act in accordance with the sustainable development principle and support the Well-being goals enshrined in our Well-Being of Future Generations and Environment Acts.

CONTEXT

Clean air is essential for life, health, the environment and the economy. Air pollution is a result of the way we currently generate power, heat our homes, produce food, manufacture consumer goods and power transport. We need to encourage and support innovation and development and uptake of cleaner technologies. Simple changes in behaviour will tackle the pollution that claims lives.

Air pollution is a local, regional, national and international problem caused by the emission of pollutants which, either directly or through chemical reactions in the atmosphere, lead to negative impacts on human health, ecosystems and the economy.

The Minister for Environment, Energy and Rural Affairs declared a Climate Emergency in April 2019. The Clean Air Plan contributes to addressing the challenges faced, alongside other strategies and plans for decarbonisation, agriculture and the natural environment.

Long term

- ◆ *What long term trends, challenges and opportunities might affect the proposal?*

The issue of air pollution is a global phenomenon and by its very nature cannot be addressed by one nation, and as a result climate change and actions by other governments will affect this proposal. The Clean Air Plan identifies things that Wales can address as part of its global responsibilities.

- ◆ *How does the proposal prevent / mitigate the bad effects in these trends or facilitate / make the most of the good effects?*

The Clean Air Plan aims to establish **long-term targets** and sustainable actions to achieve the progressive reduction of emissions and pollutants in the air.

Prevention

- ◆ *How does the proposal support the breaking of negative cycles such as poverty, poor health, environmental damage and loss of biodiversity?*

Evidence suggests that poor air quality disproportionately affects the most vulnerable in society. Improvements in air quality will support the tackling poverty agenda by contributing to the health of everyone in society, but particularly those in less affluent groups.

Taking **preventative** action to reduce the impacts of air pollution on public health and the natural environment, by adopting preventive approaches where we can, and developing successful early actions whilst devising long term solutions.

The Plan is specifically intended to reduce and mitigate risks to health, and to promote ways of working and travelling that support and enhance the environment.

- ◆ *Does the proposal treat a symptom or the underlying cause? If so how? If it treats a symptom, what can be done about the underlying cause?*

The Plan aims to address the underlying causes of air pollution, and where this is not possible, to mitigate the effects.

- ◆ *How could the proposal minimise its own negative impacts e.g. minimising waste and resource use, emissions and impact on air quality, negative impact on social / community cohesion?*

The Plan aims to deliver impacts that are largely positive. The likely negative consequences of this plan are financial, as there are significant costs associated with some of the proposed activities.

The Plan proposes some actions that prompt consideration of changes in individual and collective thinking and behaviour; these may be received sceptically, but over time may contribute to improved well-being and greater opportunities to act as communities of location or communities of interest.

Integration

- ◆ *How could this proposal connect and contribute to different public policy agendas and generate multiple benefits e.g. how can a transport project support improvements in health, culture or worklessness?*

The Plan has been developed in collaboration with internal and external stakeholders and groups, including Public Health Wales, Healthy Air Cymru, Swansea University, the Wales Air Quality Forum, Natural Resources Wales and Transport for Wales.

The Plan has been designed to reflect the sustainable development principle through focussing on actions that result in improving air quality, reducing the harmful effects of air pollution on citizens and the environment.

It is structured thematically to reflect the need for collaboration and integration between various sectors and interest groups.

The plan has been developed through formative dialogue with key stakeholders across Government, public sector bodies, Local Authorities, voluntary and community representative organisations.

Improving the integration of air quality management processes through better working practices between public, commercial and third sector organisations, balancing the

tensions between, say, emissions and noise reduction with maintaining industrial productivity.

- ◆ *What practical steps have you taken to integrate your proposal with **Prosperity for All** - our National Strategy, **well-being objectives** and plans, as well as those of other public bodies and Public Service Boards, to maximise the proposal's contribution across the seven well-being goals?*

Prosperity for All – the National Strategy commits us to building healthier communities and better environments. Clean air has a central role in creating the right conditions for better health, well-being and greater physical activity in Wales. This is reflected through a commitment to reducing emissions and delivering vital improvements in air quality through planning, infrastructure, regulation, and health communication measures.

Collaboration

- ◆ *Who are the partners that have a shared interest in this proposal?*

Partners in the proposal include: relevant departments within Welsh Government; UK Government; local authorities; NGOs; Public Health Wales; Natural Resources Wales; Transport for Wales. Collaboration aims to ensure actions are implemented and well-being objectives are met.

- ◆ *How have those partners been involved in developing the proposal and planning its delivery, and what contribution will they make to it?*

These partners have contributed to the development and will contribute to the delivery of actions that meet the plan's commitments, intentions and ambitions.

Involvement

- ◆ *How have people affected by the proposal been involved in developing it?*

By **involving** stakeholder representatives in the development of the plan at all stages, contributing to an understanding of what is needed in different places by different groups of people.

- ◆ *What matters to the people affected by the proposal and how might they be involved in its delivery?*

Stakeholders have been involved in the development and will be involved in the delivery of the plan. They provide a wealth of knowledge and understanding of what is needed in different places by different groups of people.

In addition to the five ways of working above, consider the following areas:

Impact

- ♦ *What are the main arguments for and against the proposal? Please refer to evidence; acknowledge significant gaps in our knowledge and describe any plans to fill them.*

There is a significant body of research from Welsh, UK and international sources that makes clear the relationship between airborne pollution, health and mortality. In addition we have substantial evidence of the need to tackle airborne pollution from agricultural, commercial, domestic, industrial and transport sources. Welsh Government has devolved responsibility to address airborne pollution and legal commitments to ensure that European targets are met.

How widely have you explored these arguments through involvement and collaboration?

The need for action and the contents of the Plan have been developed in close collaboration with a range of stakeholders, including Public Health Wales, Healthy Air Cymru, Wales Air Quality Forum, UNICEF.

Costs and Savings –

- ♦ *What will the proposal cost and how will it be funded?*

A £20 million Clean Air Fund has been made available to support costs to deliver the Welsh supplement to the UK plan for tackling roadside nitrogen dioxide concentrations in Wales up until the end of FY 2020/21. Local authorities are able to claim any costs incurred as a result of this work in full from this fund. The latest profile of budget and likely spend is as follows in £ millions.

Year	2019-20	2020-21	2021-22	2022-23	Total
Revenue Cost - Caerphilly	0.070	0.009	0.009	0	0.088
Revenue Cost – Cardiff (0.237	0.419	0.156	0	0.812
Revenue Budget	3.415	0	0	0	3.415
Total Surplus funding (+) / shortfall (-)	3.108	-0.428	-0.165	0	2.515
Capital Cost –Caerphilly	2.754	0.804	1.325	0	4.883

Capital Cost –Cardiff	8.381	10.624	0.761	0.634	20.400
Capital Budget	6.475	2.815	0	0	9.290
Total Shortfall (-)	-4.660	-8.613	-2.086	-0.634	-15.993
Capital Bid	4.660	7.885			

Based on estimated figures received to date, a capital pressure and bid of £4.660m has been identified for 2019-20 and an in-year Capital bid has been submitted. A shortfall in capital funding has been raised as a pressure and a subsequent bid of £7.885m in the current 2020-21 appraisal round.

The predicted costs associated with the provision of Measures on the Welsh Government road network arising from the Welsh supplement to the UK plan for tackling roadside nitrogen dioxide concentrations are estimated to be £2.6m. It should be noted the High Court ruling states specifically that cost cannot be taken into consideration when improving nitrogen dioxide levels.

Measures to support air quality improvement are likely to be costly and will need to be sustained over a period of possibly up to 20 years to support current and future generations.

Up to £350K is required for future evidence necessary to support the ambitions in the 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.

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.

Costs incurred as part of consultation will be met by the existing BEL 2817 Radioactivity and Pollution Prevention budget.

- ◆ *How might costs be reduced through involvement and collaboration, across Welsh Government and/or with external stakeholders?*
- ◆ *Are there savings and how will these be realised?*

As air quality improves, there will be a net positive effect on health, resulting in savings for the NHS.

Mechanism

- ♦ ***Is legislation proposed? If so you will probably need to complete a [Regulatory Impact Assessment](#). You can use the output of this Integrated Impact Assessment to help you.***

It is currently envisaged that the plan will include work to prepare a Clean Air Bill. Consideration will also be given to existing regulatory powers, enforcement and sanctions, and whether there is a case to strengthen these. Evidence from the consultation will be used to inform any necessary action to ensure that the most appropriate tools are available.

SECTION 7. CONCLUSION

7.1 How have people most likely to be affected by the proposal been involved in developing it?

Not only is it our duty to engage and consult in certain circumstances, but there is clear evidence that involving the public and stakeholders is central to successful policy and delivery. In keeping with the Well-being of Future Generations (Wales) Act 2015, we are committed to involving people. Please describe how you have involved:

- *Children and their representatives;*

There will be opportunities for children and young people to contribute during the consultation period for the Plan in order to ensure that they have an opportunity to influence the outcome and final Plan.

- *People with protected characteristics under the Equality Act 2010;*

There will be opportunities for those with protected characteristics to contribute during the consultation period for the Plan in order to ensure that they have an opportunity to influence the outcome and final Plan.

- *Welsh speakers and Welsh language specialist groups;*

The Consultation will follow Welsh Government standard practice in relation to language considerations.

and,

- *Other people who may be affected by the proposal.*

7.2 What are the most significant impacts, positive and negative?

This section should be used to help complete section 6 of the MA template

Cleaner air across Wales will provide significant and wide ranging benefits for all parts of society, our environment and our economy. This Plan sets out how the Welsh Government will take action to reduce air pollution to support extensive benefits for Wales, safeguarding a healthy and more prosperous Wales for this and future generations.

Summarise the most significant impacts for the people, culture and Welsh language, economy and environment of Wales, expected as a result of the proposed action. Describe the themes that emerged from involving people. Refer to the seven well-being goals and the Welsh Government's well-being objectives. Contrast with the impact of current Welsh Government action if appropriate.

This Clean Air Plan:

- provides context about what we mean by clean air, current air quality management frameworks in Wales and the challenges we face;
 - sets out how we will work collaboratively across sectors, taking action to reduce air pollution to improve public health, biodiversity and the natural environment;
 - explains how air quality policy aligns with wider Welsh Government policy and the priorities and principles we will apply in delivering the Plan; and
 - demonstrates how we act in accordance with the sustainable development principle and support the Well-being goals enshrined in our Well-Being of Future Generations and Environment Acts;
 - demonstrates how we act in accordance with The United Nations Convention on the Rights of the Child;
 - includes information about the complex links and inter-relationship between decarbonisation and improving air quality;
 - brings together existing commitments with new actions to address air quality improvement.
- The Plan is focused on airborne pollution, its impact on the public health, the natural environment and well-being in Wales, and the action being taken to provide long-term, sustainable improvements.

Key pollutants are:

- Particulate matter (PM_{2.5} and PM₁₀)
- Nitrogen Oxides (NO_x): comprises nitric oxide (NO) and nitrogen dioxide (NO₂).
- Ground-level ozone (O₃)
- Sulphur dioxide (SO₂)
- Nickel (Ni)
- Benzo[a]pyrene (B[a]P)
- Ammonia (NH₃)
- Non methane volatile organic compounds (NMVOCs)
- Benzene (C₆H₆)
- Lead (Pb)
- Carbon Monoxide (CO)

Noise pollution is closely associated with air pollution and is also addressed.

The Plan uses a thematic approach to address broad areas of impact, where work across organisations and themes can better address problems and build collaborative approaches to future action. The themes complement each other and interact to create a sustainable approach to improving air quality, integrated with other policy and legislation. The themes are:

- **Improving air quality to protect the health and wellbeing of current and future generations**
 - **Improving air quality to support our natural environment, eco-systems and biodiversity**
 - **Improving air quality to support a prosperous Wales**
 - **Improving air quality to support sustainable places**
- Each theme in the Clean Air Plan is supported by a chapter and associated actions. The timescales for delivering actions are framed within the current Assembly (to 2021) and next Assembly period (2021-26) and the future from 2026 onward.

7.3 In light of the impacts identified, how will the proposal:

- **maximise contribution to our well-being objectives and the seven well-being goals?**

This plan is set within the context of our obligations under the Well-being of Future Generations (Wales) Act 2015 (WFGA) sustainable development principle, which places a duty on all public bodies in Wales to consider how their actions might impact in the long term, and how they will alleviate problems of poverty, health inequalities and climate change.

The Plan contributes to the Act's goals, primarily to achieving a healthier Wales and a resilient Wales, and demonstrates our commitment to being a globally responsible Wales. Developing our knowledge, skills and capabilities in addressing air quality and reducing harmful emissions will contribute to being a prosperous Wales. We can demonstrate a Wales of cohesive communities through the way in which we address change at personal, neighbourhood and spatial levels, and through our communities of interest (e.g. agricultural, business and industrial, cultural, historical and sporting, educational, environmental, technological, age-related) across Wales and the wider world.

Well-being Goals and air quality

Goal	Description	Impacts	Clean Air Plan contribution
A prosperous Wales	An innovative, productive and low carbon society which recognises the limits of the global environment and therefore uses resources efficiently and proportionately (including acting on	Impacts on businesses, competition and employment, productivity Effects of exposure to air pollution on health.	Action taken to improve air quality will support economic growth in Wales. Wales is dependent on a productive workforce and attractive places for businesses to invest. A healthy workforce and clean environment would contribute to prosperity through a productive

Goal	Description	Impacts	Clean Air Plan contribution
	<p>climate change); and which develops a skilled and well-educated population in an economy which generates wealth and provides employment opportunities, allowing people to take advantage of the wealth generated through securing decent work.</p>		<p>workforce. Improvements in health reduce medical and health costs. Positive employment impacts would also arise for those companies that manufacture and install abatement technologies in the UK.</p> <p>Costs required to ensure the reductions in air pollution will affect a wide range of sectors. We will take action to manage any potential adverse impacts on employment, competition and small and medium-sized enterprises (SMEs).</p>
A resilient Wales	<p>A nation which maintains and enhances a bio-diverse natural environment with healthy functioning ecosystems that support social, economic and ecological resilience and the capacity to adapt to change (for example, climate change).</p>	<p>Impacts on air quality, greenhouse gas emissions and effects of pollution on biodiversity and natural habitats</p>	<p>Emission reduction from transport, industry and other sectors has a direct and significant positive impact both locally, regionally and nationally on the Welsh environment and ecosystem functioning.</p> <p>The aims of the decarbonisation programme will have a direct effect on air quality and <i>vice versa</i>. Acting on climate change not only reduces emissions and builds resilience but also ensures the Wales we live in has clean air and water, liveable places, productive farmland, energy security and green jobs.</p>
A healthier Wales	<p>A society in which people's physical and mental well-being is maximised and in which choices and behaviours that benefit future health are understood</p>	<p>Impacts on human health</p>	<p>Poor air quality can have a disproportionate impact on the health and well-being of children, older, poor and vulnerable people. Reduction of air pollution will have a direct and significant impact on improving human health and welfare for everyone.</p>
A more equal Wales	<p>A society that enables people to fulfil their potential no matter what their background or circumstances (including their socio economic background and circumstances).</p>	<p>Impacts of air quality actions on equality</p>	<p>All people who live in and visit Wales will benefit from air quality improvements, no matter what their background or circumstances are.</p> <p>Tackling impacts of poor air quality and improving air quality and human health will have a positive impact on promoting equality in Wales, especially where improvements coincide with deprived areas with high pollution.</p>

Goal	Description	Impacts	Clean Air Plan contribution
A Wales of cohesive communities	Attractive, viable, safe and well-connected communities	air quality Impacts on communities	<p>Positive (indirect) / Neutral – Actions to improve air quality which are led by or co-produced with local communities will carry greater impact and be better integrated with other actions to improve the quality of life, health and well-being, the environment and opportunities for prosperity.</p> <p>Improved air quality in deprived communities would contribute to better quality of life and community cohesion.</p>
A Wales of vibrant culture and thriving Welsh language	A society that promotes and protects culture, heritage and the Welsh language, and which encourages people to participate in the arts, sports and recreation.	Impacts on health, environment, culture and population	<p>Action to support individuals, businesses and Government to understand, value and identify with the importance of improving air quality in Wales, will empower everyone to play their own role in supporting reductions in air pollution.</p> <p>We are committed to having air quality which enables the people of Wales and visitors to enjoy and promote a wide range of recreation activities across Wales.</p> <p>Improved health would provide further opportunities for people to participate in sports and recreational activities.</p> <p>Protection of natural ecosystems and biodiversity would enhance the cultural capital of Wales and provide outdoor activities.</p> <p>We expect, and will actively encourage, promote and facilitate, the use of the Welsh language through education and services as set out in 'Cymraeg 2050: A million Welsh speakers. We will ensure equal standards of services in both English and Welsh. As we implement the Clean Air Plan, we will foster a Welsh identity which is distinctive.</p>
A globally responsible Wales	A nation which, when doing anything to improve the economic, social, environmental	Impacts on air quality, greenhouse gas emissions and biodiversity/habitats	Air pollution is major global environmental problem affecting everyone. Air pollution does not stop at or respect national and

Goal	Description	Impacts	Clean Air Plan contribution
	and cultural well-being of Wales, takes account of whether doing such a thing may make a positive contribution to global well-being. Goal 7 recognises that in an inter-connected world what we do to make Wales a sustainable nation can have positive and adverse impacts outside of Wales.		<p>international borders. We will take strong positive action on air quality in Wales to meet our national and international ethical and legal obligations. Actions to improve air quality will be closely aligned with action on decarbonisation.</p> <p>Improved air quality would directly contribute to environmental well-being in Wales. Protection of ecosystems in NATURA 2000 sites and Sites of Special Scientific Interest (SSSIs) is an international contribution to maintaining biodiversity.</p> <p>Compliance with the national emission ceilings is a contribution to international progress in reducing transboundary air pollution outside Wales, with reciprocal benefits from emission reduction outside Wales, including in the rest of the UK.</p>

Five Ways of Working	The Plan aims to deliver in line with the Act's Five Ways of Working by:
Prevention	Taking preventative action to reduce the impacts of air pollution on public health and the natural environment, by adopting preventive approaches where we can, and developing successful early actions whilst devising long term solutions.
Long term	Establishing long-term targets and sustainable actions to achieve the progressive reduction of emissions and pollutants in the air.
Collaboration	Collaboration with relevant departments within the Welsh Government, UK Government, national partners and at a local level to ensure actions are implemented and well-being objectives are met.
Integration	Improving the integration of air quality management processes through better working practices between public, commercial and third sector organisations, balancing the tensions between, say, emissions and noise reduction with maintaining industrial productivity.
Involvement	Involving stakeholders in the development and delivery of the programme at all stages, understanding what is needed in different places by different groups of people.

The WFG Act requires Welsh Government, its public sector partners and stakeholders to work together to address air quality using an integrated approach to deliver long-term sustainability and improvement. Under the Act, we have established average population exposure to nitrogen dioxide as one of the Welsh Government National Indicators which are used to measure progress towards well-being goals in Wales. Regulations made under the Act require public services boards to consider air quality when carrying out their statutory assessments of local well-being.

What action can the Welsh Government take to promote biodiversity, children's rights, equalities, the Welsh language or another of the areas covered by your impact assessments?

See above.

What action can the Welsh Government take to strengthen its contribution to a particular goal or contribute to additional goals?

See above

- **and/or avoid, reduce or mitigate any negative impacts?**

What action can the Welsh Government take to avoid, reduce or mitigate a negative impact?

See above

If no action is to be taken to avoid, remedy or mitigate a negative impact then please explain why.

7.4 How will the impact of the proposal be monitored and evaluated as it progresses and when it concludes?

What plans are in place for post implementation review and evaluation?

The Plan is expected to deliver over a 5 year lifespan. It is anticipated that the Plan will be subject to a formal evaluation approximately 2-3 years from its launch. This will give sufficient time to assimilate any recommendations from the evaluation into a future plan.

An independent expert panel and advisory group will be established to monitor progress against the plan.