

10th March 2020

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deunyddiau hanfodel
atebion cynaliadwy

essential materials
sustainable solutions

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Dear Sir/Madam

THE CLEAN AIR PLAN FOR WALES - HEALTHY AIR, HEALTHY WALES

The Mineral Products Association (MPA) is the trade association for the aggregates, asphalt, cement, concrete, dimension stone, lime, mortar and silica sand industries. With the affiliation of British Precast, the British Association of Reinforcement (BAR), Eurobitume, MPA Northern Ireland, MPA Scotland and the British Calcium Carbonate Federation, it has a growing membership of over 530 companies and is the sectoral voice for mineral products. MPA membership is made up of the vast majority of independent SME quarrying companies throughout the UK, as well as the 9 major international and global companies. It covers 100% of UK cement production, 90% of GB aggregates production, 95% of asphalt and over 70% of ready-mixed concrete and precast concrete production. In 2016, the industry supplied £18 billion worth of materials and services to the Economy. It is the largest supplier to the construction industry, which had annual output valued at £169 billion in 2018. Industry production represents the largest materials flow in the UK economy and is also one of the largest manufacturing sectors. For more information visit: www.mineralproducts.org.

Thank you for consulting us on the above document. Our comments are appended to this letter.

If you require clarification on any of the points made, please do not hesitate to contact us. We welcome future engagement on this matter. We should be grateful if you could forward future correspondence to the email below.

Yours faithfully

A handwritten signature in blue ink, appearing to read 'Nick Horsley', is written over a light blue horizontal line.

Nick Horsley
Director of Planning, MPA Wales

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MPA Wales/Cymru is part of the Mineral Products Association, the trade association for the aggregates, asphalt, cement, concrete, dimension stone, lime, mortar and silica sand industries

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| Section Title | Questions | MPA Comment |
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| <p>The Clean Air Plan for Wales - Thematic Approach and Commitments</p> | <p>1. Does the thematic approach in the Clean Air Plan bring together the key air quality issues in a way that is clear and helpful way?</p> | <p>Yes, in general. However, the plan does not present a clear and focussed approach to delivery. There are plenty of ideas out forward, but little structure to the managed implementation. Further, the statistics cited in the introduction are broad and general. They would benefit from focus to add substance.</p> <p>Whilst any death associated with air pollution could be considered one too many, we are concerned that the statistics are being used to “shock” the reader. They do not attribute the specific nature and extent of air pollution to an actual number of deaths. Adopting the document’s themed approach, how many deaths are attributed to pollution associated with transport, energy generation or agriculture. Are there underlying considerations which are being overlooked such as work place exposure to particulates? Without the proper assessment of the mortality statistics associated with specific places, subsequent monitoring and analysis may prove worthless.</p> <p>In addition, the MPA believes the references to noise pollution and soundscape are out of context within a “Clean Air Plan for Wales”. Whilst the plan identifies similarities between air pollution and noise pathways, the potential health implications of noise and particulates are not necessarily compatible. Further, environmental noise is a measurable, determinable and attributable science with established guidance and principles existing within Welsh planning policy and environmental regulations. This is particularly applicable in the area of mineral extraction and processing. We believe the Clean Air Plan should focus on airborne pollution rather than matters linked to air quality in general, unless the document is re-titled as the “Air Quality Plan for Wales”. Furthermore, a “Noise and Soundscape Plan” already exists for Wales and it is not clear how these documents will dovetail.</p> |
| <p>Air pollution and health</p> | <p>2. Do you agree enhancing monitoring and assessment capabilities will help to understand and inform action to reduce the impacts of air pollution on health</p> | <p>Yes. It is important to establish a baseline of air pollution and pollutants through a formulated programme of monitoring and evaluation. The monitoring should be in real time, both in terms of particulate size and in particulate analysis, incorporating climatic and meteorological conditions.</p> |

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| | <p>and well-being in Wales? Please provide evidence in support of your views where possible.</p> | <p>The consultation document recognises that the relative toxicity of different components of the particulate matter are not yet clearly understood. Real time analysis will go some way to enabling the nature, source and potential risk of pollutants to be determined and allow a focused methodology to address the source and severity of particulates.</p> <p>We would also suggest that the data from the monitoring network is made publicly available in its raw form as well as in summary. This would ensure transparency and broader interpretation.</p> |
| | <p>3. Do the commitments and actions for health and well-being address the most important factors for improving air quality and realising health benefits?</p> | <p>It is important that the workings and findings of the independent panel of experts are transparent and open to scrutiny. Targets must be robust but achievable. The MPA supports the approach to develop and consult on new targets but to be truly sustainable, we would seek assurance that these are achievable and subject to appropriate economic considerations, as well social and environmental. Further, appropriate consideration should be given to unintended consequences, for example where measures to reduce one pollutant result in an increase in another pollutant.</p> |
| <p>Local Air Quality Management (LAQM)</p> | <p>4. Are you satisfied the proposals for Local Air Quality Management will result in robust, effective air quality management arrangements?</p> | <p>Standards set by Welsh Government must be sustainable and should not disadvantage Wales in a post-Brexit environment. Further, a well-considered and fit for purpose communication strategy is critical to ensure engagement at all levels. Poor communication could breed disengagement with the public and may result in deprived areas suffering further due to the stigma of poor air quality. Industry engagement is also imperative. Identification of the appropriate tools, the ability to deliver improvements in air quality and the subsequent monitoring and review of measures must form part of the LAQM implementation. We would suggest the most appropriate way to implement improvements would be through the carrot and not the stick.</p> |
| <p>Area-specific policies and the designation of air quality improvement areas/zones.</p> | <p>5. Are you satisfied with the proposed approach for Clean Air Zones/Low Emission Zones in Wales?</p> | <p>Any clean air zone must be deliverable and must recognise the levels of development likely to take place in an area. Areas of regeneration will require the recycling of building materials associated with demolition and site preparation as part of the circular economy. Appropriate mitigation measures employed at these sites will</p> |

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| | | <p>help minimise particulate emissions. Regeneration will also require a significant number of HGVs delivering construction materials to facilitate new development. Banning HGVs or charging significant and disproportionate access fees within these areas would be counterproductive.</p> |
| <p>Domestic Combustion</p> | <p>6. Do you agree with the proposals for tackling air pollution from domestic combustion?</p> <p>7. Which aspects of Smoke Control would you would like Welsh Government to consider or strengthen?</p> | <p>We would question the ability to enforce such restrictions on domestic appliances. It should be noted that in many rural areas oil is the main source of heating, often supplemented by log burners. It may be necessary for WG to incentivise alternatives methods in order to reduce domestic emissions.</p> <p>We support updated and appropriate testing standards using modern testing equipment for all fuels to ensure parity across the market.</p> |
| <p>Integration of area specific policies</p> | <p>8. Are you satisfied with proposals to deliver a more integrated air quality management approach? If no, please provide evidence to support other alternatives.</p> | <p>Work placed parking levies may be acceptable where there are integrated alternatives forms of transport. Again, reasonable alternatives should be provided before implementation and prior to fiscal penalties are applied. This should also recognise that there are rural areas and urban fringes where access to public transport is extremely limited or non-existent. Again the approach should be the carrot and not the stick. To avoid this becoming a worker tax, any revenue raised from such levies should be ringfenced to ensure alternative transport options are available and not lost within Local Authority finance department. Home working should be encouraged to help limit commuter journeys, but not to the detriment of services provided. Furthermore, such levies must align with workers equalities particularly where medical conditions may limit accessibility and where childcare responsibilities may limit options for the use of public transport.</p> |
| <p>Indoor Air Pollution</p> | <p>9. Are there aspects of indoor air pollution which you would like Welsh Government to address? You may wish to consider what the Welsh Government's top priorities should be for regulating chemicals in articles and products which may contribute</p> | <p>From a work place perspective Welsh Government should recognise initiatives such as NEPSI. NEPSI is the acronym for the *European Network for Silica* formed by the Employee and Employer European sectoral associations having signed the Social Dialogue "Agreement on Workers' Health Protection Through the Good Handling and Use of Crystalline Silica and Products Containing it".</p> <p>As highlighted in the consultation document, the toxicity of particulates may</p> |

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| | to poor indoor air quality. | not always be apparent. For most carcinogens and mutagens, it is not scientifically possible to identify levels below which exposure would not lead to adverse effects. This applies to both the home and the work place. For other carcinogens and mutagens it is scientifically possible to identify levels below which exposure is not expected to lead to adverse effects. |
| A Clean Air Act for Wales | 10. Do you support the proposals for a Clean Air Act for Wales? | We support the proposals for a Clean Air Act for Wales, subject to the caveats identified above. Measures such as baseline monitoring, with real time analysis; consideration of whether or not the document is appropriately titled “clean air” if it is to include noise and soundscape; the measures implemented, should be truly sustainable; WG should adopt a carrot and not a stick approach. Fiscal measures such as work placed parking levies should only be implemented, post the implementation of practical and reasonable alternatives; Clean Air Zones and AQMAs should recognise the need to have flexibility and finally a well-conceived communication strategy is critical. |
| | 11. Are there additional issues a Clean Air Act should address? | No comment |
| | 12. What other legislative or regulatory actions in relation to air quality should we consider to improve people’s lives and community well-being in a sustainable way? | New measures imposed should complement and not confuse existing guidance and policy, e.g. noise considerations for the extractive industry. Clear and definitive responsibilities for respective regulators must be defined. |
| Public awareness about airborne pollution | 13. Citizen science projects to date have focused on work with young people. Are there other age groups or communities would you like to see us work with? | The communication strategy should engage with all elements of society, including the public and communities and with industry. Indeed, engagement with industry would facilitate a balanced message being delivered across the age groups. |
| | 14. Which age groups do you think would benefit most from greater understanding of air quality, pollutants, evidence and interpretation, and developing personal | As indicated above, any communication strategy should be inclusive and engage with all elements of society and both with the public and communities and with industry. |

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| | awareness and responsibility? | |
| | 15. Are there other approaches or opportunities to develop greater understanding of air quality issues that you think we should explore? | <p>If the Curriculum for Wales is to be amended to provide a greater opportunity to develop a greater understanding of air quality, pollutants and a personal contribution to preserving and improving our environment, then this clearly needs to present a balanced view. For example if one is to promote green energy, storage and technology, then this must go hand in hand to recognise that this will require raw materials which is not limited to timber. Metals and minerals mining required to produce batteries that store electricity and for the materials used in the turbine and solar technology. Wind turbines require secure platforms made from concrete. Nuclear power stations and tidal lagoons also require significant quantities of raw materials for their construction. Mining operations also help deliver significant benefits in net-gain. Industry should not be regarded as damaging to the environment. It is a mechanism to help deliver air quality improvements, through providing the raw materials required to achieve net zero, whilst delivering net gain.</p> |
| | <p>16. Do the proposed communications work streams provide a suitable focus for air quality communications and behaviour change work?</p> <p>17. Are there features you would like as part of the Air Quality in Wales website?</p> <p>18. Are there specific communications and behaviour change campaigns you would support?</p> <p>19. Are there age groups or communities who could contribute to developing citizen science projects?</p> | <p>In part, yes, however, there is no reference to engagement with industry and/or the commercial sector</p> <p>The development of the Air Quality in Wales must be balanced and take all sustainable principles in to consideration. Economic growth helps deliver wealth, technology and innovation.</p> <p>No comments</p> <p>This must engage and encompass all age groups and communities</p> |
| | 20. Which age groups would benefit most from developing personal awareness, understanding and | All age groups would benefit from a balanced and well presented educational approach to air quality issues |

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| | responsibility in terms of air quality and pollutants? | |
| | 21. Are there additional approaches or opportunities to develop greater understanding of air quality issues that should be explored? | The development of any approach should encompass regulators and industry |
| Improving air quality to protect the health and well-being of current and future generations - commitments and actions | 22. Do the proposed commitments and actions address the issues described in the health and well-being section of the Plan? 23. Do you agree the actions will help to reduce the impact of air pollution on health and well-being in Wales? 24. What additional commitments or actions would you propose? | No comment No comment From the outset it is important that all regulator roles are clearly defined. If there are cross functional issues, these should be aligned with responsibilities also made clear. |
| Improving air quality to support our natural environment, ecosystems and biodiversity | 25. What sorts of nature based solutions could be promoted to help to reduce human exposure to air pollution? 26. How can we speed up the recovery of our biodiversity and ecosystems alongside emission reduction? 27. What activities can we emphasise in our environmental growth plan to help tackle air pollution and its impact on ecosystems in Wales? | The progressive restoration of mineral sites makes a significant contribution to delivering nature based benefits. The requirements for management and maintenance through agreed aftercare schemes ensure such schemes deliver over the longer term. In the urban environment, landscaping schemes are rarely monitored and under enforced by local planning authorities. As such, in areas often associated with higher traffic volumes, the potential contribution of nature based solutions falls short of what could be achievable. A broad engagement between industry, regulators and communities would help speed up recovery. Engagement and partnerships will achieve more than regulation. Many sectors can readily deliver net gain and a nature based approach to air quality improvement. Minerals based solutions in construction are more effective in delivering building longevity, effective insulation and long term safety, especially when these are sourced locally. In addition such materials are critical in delivering |

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| | | <p>green energy generation and storage solutions. Increasing woodland planting is a contributory element to help tackle air pollution and its impact on ecosystems, however, to then cut the woodland down for construction purposes would appear to be counter-productive. Further, importing timber for construction purposes ignores the proximity principle of supplying raw materials from local sources.</p> |
| | <p>28. Do the proposed commitments and actions address the issues described in natural environment, ecosystems and biodiversity section of the Plan?</p> <p>29. Do you agree the actions will help to reduce the impact of air pollution on natural environment, ecosystems and biodiversity in Wales?</p> | <p>The commitments and actions appear sensible, subject to the comments raised above.</p> <p>Again, see comments above.</p> |
| | <p>30. What additional commitments or actions would you propose?</p> | <p>No further comment.</p> |
| <p>Industrial Air Pollution</p> | <p>31. On which sectors, processes or areas should we focus our action to reduce public exposure to industrial emissions to air pollution?</p> | <p><u>Carbon Capture Utilisation and Storage</u></p> <p>We welcome the commitment to seize the opportunities to take actions which both decarbonise the Welsh industrial base and simultaneously reduce the emission of pollutants which diminish air quality.</p> <p>Decarbonisation is a key issue for MPA Wales Members, particularly those involved in the manufacture of cement products, although there are limited options to reduce the unavoidable carbon dioxide (CO₂) emissions associated with the thermal decomposition of materials during the manufacturing process. One option is to capture CO₂ emissions for utilisation and storage (CCUS). CCUS also provides a route to capture and store other air emissions and therefore has the potential to make a significant contribution to improved air quality in a prosperous Wales. We therefore believe that Welsh Government should prioritise support for CCUS technologies at cement plants and other industrial installations.</p> <p><u>Emissions Monitoring Standards</u></p> <p>MPA has found that emissions monitoring standards have not kept pace with</p> |

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| | | <p>monitoring equipment, emissions abatement technologies, or emission limit values. As a result, industrial installations are being asked to demonstrate regulatory compliance with emission limit values when it is simply not feasible to do so. For example, since April 2017, all cement manufacturers in Wales have been subject to a 10mg/m³ emission limit for particulate matter. At such low emission levels, emissions monitors cannot be calibrated using the specified standard reference method, EN13284-1. This means that, whilst emissions are being monitored and managed, it is technically impossible for operators to demonstrate compliance.</p> <p>We note that there are also monitoring issues with other pollutants, not just particulate matter. Furthermore, many of these monitoring issues are cross-sectoral. We would therefore welcome further investment in emissions monitoring standards for industrial installations.</p> |
| | <p>32. Are there any specific legislative changes you think we should consider in order to tackle industrial emissions to air?</p> | <p>The minerals industry, and particularly the cement sector, has already made significant investment and taken early action to reduce key emissions to air. Industrial emissions in Wales are regulated through the Environmental Permitting Regulations which includes a commitment to deploying best available techniques (BAT). Uptake of BAT in UK cement production is widespread and recent modifications to environmental permits have introduced further reductions to emissions limits. BAT has provided a strong framework to drive improvements in abatement of industrial emissions. Furthermore, many cement operators already go beyond BAT requirements.</p> <p>We welcome Welsh Government's commitment to maintaining a high standard of environmental protection following EU-Exit. The MPA would like to see a coordinated approach within the UK to the development of UK BAT after EU-Exit, to ensure a consistent environmental regulatory framework across Wales, Scotland, Northern Ireland and England. Otherwise there is the risk that regulatory fragmentation could damage the specific areas of the minerals industry, including the cement sector. Development of a regulatory framework in the UK which delivers a level playing field is imperative.</p> <p>We would seek assurance that any legislative changes to air quality legislation in Wales are 'proportionate'. Any emission-specific air quality policies and</p> |

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| | | <p>regulation need to be considered holistically, to ensure that environmentally responsible Welsh manufacturing is supported and valued and so contributes to prosperous clean growth in Wales, the UK and globally. Failure to do so would create a real risk that, in an international marketplace, additional costs and increased regulation may increase imports and divert investment away from Wales, effectively exporting, rather than reducing, industrial emissions. This would ultimately be damaging to Welsh manufacturing and contrary to Welsh Government's stated commitment in the Clean Air Plan for Wales to support economic growth in Wales.</p> |
| | <p>33. Are there any specific actions or measures with which we can encourage investment by industry to reduce air pollution?</p> | <p>The minerals industry, and particularly the cement sector, have already made significant investment and taken early action to reduce key emissions to air. As such, approaches that recognise the early action and investment of the cement sector will be important. This means that further action is challenging, often more costly, and delivers a smaller environmental benefit. It is therefore important that those who are only just starting on the journey to reduce emissions are not disproportionately incentivised over those who have been committed to such actions for a number of years.</p> <p>The consultation recognises the role of early action to drive down air pollution, and the development and compliance with BAT through existing permitting arrangements. By its nature, BAT is 'best' and it is difficult to understand what measures can be taken to go beyond 'BAT' and thus understanding should temper expectation on static installations.</p> <p>We would expect any industry-specific actions or measures to be developed within the new BAT process post EU-Exit. This new BAT process should continue to incorporate and engage industry stakeholders in determination of BAT for their sectors. The MPA would ask for the new BAT process to incorporate a more thorough assessment. In our experience, the economics of availability of specific measures have not always been adequately addressed in EU-BAT.</p> <p>It may be inappropriate for the MPA to recommend specific measures here. Nonetheless, we would like to re-iterate that any actions or measures should be 'proportionate' and should not risk</p> |

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| | | undermining Welsh prosperity by offshoring manufacturing. |
| | 34. Are there any novel or emerging approaches to reducing emissions to air from industry that you think we should consider? | <p>We have highlighted above the need for WG support for CCUS and would welcome further discussions with WG on additional support that the cement sector could use to accelerate decarbonisation. There might be support the WG could give to build on work currently being undertaken by the sector with funding from the Department for Business, Energy and Industrial Strategy (BEIS) for ground-breaking demonstrations of hydrogen and plasma technology. The current phase of the project will demonstrate the potential of these technologies to reduce carbon emissions through fuel switching away from fossil fuels in cement production. If the trials are successful, there might be support the WG could offer to help deploy these technologies in Wales.</p> <p>It is vital that the new post EU-exit BAT process should continue to incorporate and engage industry stakeholders in determination of BAT for their sectors. In our experience, EU-BAT has not always addressed the economics of availability of specific measures. We would ask for the new BAT process to incorporate a more thorough assessment of the economics of any new abatement technologies, in order to avoid any adverse impacts on Welsh cement manufacturing.</p> |
| | 35. Do you think generators used for research and development should be treated differently in terms of emission controls? | No Comment |
| Improving air quality to support a prosperous Wales - commitments and actions | 36. Do the proposed commitments and actions address the issues described in the Prosperous Wales section of the Plan? | <p><u>Circular Economy</u></p> <p>We believe that the Minerals Products Industry is a key contributor to the Circular Economy and has been for many years with recycling rates of construction materials. In the UK 120mt of Construction, Demolition and Excavation Waste (CDEW) is produced in a typical year, of which 12mt represents navigational dredging spoil disposed offshore and hazardous waste. From the remaining balance of 108MT:</p> <p>76% of all Construction, Demolition and Excavation Waste (CDEW) is currently recycled or recovered in the ‘chain of utility’ and directly contributes to the Circular Economy;</p> |

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| | <p>90% of hard (CDEW) is recycled as aggregates. Together with a further 9MT of recycled soft Excavation Waste (EW), this contributes 60MT to the construction materials supply chain;</p> <p>57% of soft Excavation Waste (EW) is beneficially used, mainly in backfilling operations to restore land, often following mineral extraction;</p> <p>Only 26mt of the remaining CDEW stream is actually sent for disposal, of which a proportion is likely to be used beneficially.</p> <p>In addition, waste materials form an important element in the sustainable manufacture of cement, as alternative raw materials and as an energy source, by a unique technology known as ‘co-processing’:</p> <ul style="list-style-type: none"> • Waste is used as an alternative fuel (energy recovery), which reduces the demand on primary fossil fuels - as well as reducing CO2 and other emissions. • At the same time, the cement manufacturing process recycles the mineral content of the waste, and solid fuels, as a raw material (material recycling) - thus reducing dependence on virgin raw materials. • All the mineral content from the waste is captured in the cement product, therefore no residual waste is generated by the manufacturing process. <p>Co-processing in cement manufacturing provides a positive end use for materials which have reached their end of life and maximises the value from waste materials, especially when compared to disposal to landfill or incineration, including through Energy from Waste facilities. As it displaces primary fossil fuels as an energy source, co-processing waste in cement manufacturing does not increase overall emissions. The MPA believes that it will benefit the environment in Wales, and support the growth aspirations and ambitions of the Welsh Government if the recycling of wastes in cement manufacturing is encouraged as an upcycling opportunity for low value, end-of-life materials and a means to reduce overall emissions to air. Welsh Government should recognise co-processing in cement kilns as a valuable element of the Circular Economy.</p> <p><u>Proportionate and Coordinated Regulation following EU-Exit</u></p> |
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| | | <p>The MPA welcomes Welsh Government’s commitment to maintaining a high standard of environmental protection following EU-Exit. We would like to see a coordinated approach within the UK to development of UK BAT after EU-Exit, to ensure a consistent environmental regulatory framework across Wales, Scotland, Northern Ireland and England.</p> <p>We also asks that any changes to air quality legislation and environmental regulation in Wales post EU-Exit are ‘proportionate’ and so ensure that environmentally responsible Welsh manufacturing is supported and valued, so that it contributes to prosperous clean growth in Wales, the UK and globally. Otherwise there is a real risk that, in an international marketplace, additional costs and increased regulation may increase imports and divert investment away from Wales, effectively exporting, rather than reducing, industrial emissions. This would ultimately be damaging to Welsh manufacturing and contrary to Welsh Government’s stated commitment in the Clean Air Plan for Wales to support economic growth in Wales.</p> <p><u>Actions to improve air quality and reduce greenhouse gas emissions</u></p> <p>As discussed in response to question 31, we believe that Welsh government should urgently prioritise support for CCUS technologies at cement plants, as these technologies offer a key opportunity for reducing industrial emissions of greenhouse gases and air pollutants together.</p> |
| <p>The National Infrastructure Commission for Wales</p> | <p>37. Should air quality issues be referenced in the remit of NICW?</p> | <p>Air quality matters should be treated with parity across the regulatory system and processes.</p> |
| <p>Transport</p> | <p>38. Are there other air quality matters relating to transport which Welsh Government should consider or review?</p> | <p>It is important to highlight the limitations of EVs in transporting heavy goods for the construction industry. Distances travelled are limited and any downtime during the day to re-charge a vehicle may have serious economic consequences. Further, charging facilities at destination sites will be limited as these are often sites where new development or regenerstions is taking place and charging points may not yet be installed. The development of new technologies in heavy goods road transport should be supported by WG and it is important that any fee penalties imposed are phased in over a reasonable timescale to facilitate fleet replacement over time.</p> |

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| Improving air quality to support sustainable places - commitments and actions | <p>39. Do the proposed commitments and actions address the issues described in the Plan?</p> | <p>No additional comments to those made above (Question 5)</p> |
| | <p>40. Do you agree the actions will help to reduce the impact of air pollution to support sustainable places in Wales?</p> | <p>No additional comments</p> |
| | <p>41. What additional commitments or actions would you propose?</p> | <p>No comments</p> |
| Welsh language | <p>42. We would like to know your views on the effects the <i>Clean Air Plan</i> will have on the Welsh language, specifically on:</p> <ul style="list-style-type: none"> a. opportunities for people to use Welsh; and b. treating the Welsh language no less favourably than the English language. | <p>No comments</p> |
| | <p>43. What effects do you think there would be? How could the positive effects be increased, or negative effects be mitigated?</p> | <p>No comment</p> |
| | <p>44. Please also explain how you believe the proposed Plan could be formulated or changed so as to have:</p> | <p>No comment</p> |
| | <ul style="list-style-type: none"> a. positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language | <p>No comment</p> |
| | <ul style="list-style-type: none"> b. no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no | <p>No comment</p> |

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| | less favourably than the English language. | |
| General question | 45. We have asked a number of specific questions. If you have any related issues that we have not specifically addressed, please use this space to report them. | It is imperative that planning, policy and regulation moves with the times. It may be necessary to review of the General Permitted Development Order to keep pace with new technology and innovation, particularly in the areas of green energy supply and storage. PD rights afforded to utilities may need to be applied to private sector developments to ensure the timely delivery of infrastructure. This could readily be incorporated in the formal review of planning law currently taking place in Wales. |