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Llywodraeth Cymru
Welsh Government

Welsh Government
Consultation – summary of response

Tackling Roadside Nitrogen Dioxide Concentrations in Wales

Achieving Compliance with Nitrogen Dioxide Limit Levels on the
Motorway and Trunk Road Network

November 2018

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

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1. Introduction

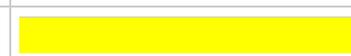
- 1.1. Tackling poor air quality is a priority for the Welsh Government and this is reflected in the National Strategy 'Prosperity for All'.
- 1.2. The Welsh Government is working alongside the other devolved administrations to meet their joint objective with the UK Government to transform the UK's most polluted towns and cities into clean and healthy urban spaces, supporting those most directly affected and ensuring the vehicle manufacturers play their part to improve the nation's air quality.
- 1.3. An Interim Welsh Government supplemental plan to the UK plan for tackling roadside nitrogen dioxide concentrations 2017 - Tackling Roadside Nitrogen Dioxide Concentrations in Wales was published on the 31 July. This plan contained potential measures to achieve compliance with limit values for nitrogen dioxide (NO₂) laid down by the Ambient Air Quality Directive (2008/50/EC) and the Air Quality Standards (Wales) Regulations 2010 at 5 locations on the motorway and trunk road network in Wales.
- 1.4. This consultation was launched on the 21st September 2018 seeking views on the final measures proposed at each of the 5 locations following the completion of detailed investigations and modelling at the end of August.
- 1.5. The consultation consisted of 6 specific questions concerning the proposed actions at the 5 different locations.

2. Summary of Consultation Responses

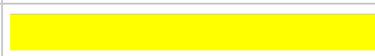
- 2.1. In total, the Welsh Government received 417 responses from a range of stakeholders from various sectors, including members of the public, commercial entities, non-governmental organisations, registered charities, and public bodies.
- 2.2. Not all respondents commented on every question in the consultation document, and some respondents did not clearly express whether they agreed or disagreed with measures proposed. Every effort has been made to interpret and include the respondent's intended viewpoint within the consultation analysis.
- 2.3. The summary in the following sections is presented by question and draws out similarity of views, suggestions, constructive criticism and useful points made.

3. Responses to Questions Analysis

1. Do you agree that the identified measure(s) will achieve compliance with the NO2 limit values as soon as possible?			Response Percent	Response Total
1	Yes		8.94%	37
2	No		83.57%	346
3	Don't know		7.49%	31
			answered	414

2. Do you agree that the identified measure(s) will achieve compliance in a way that reduces exposure to NO2 as quickly as possible?			Response Percent	Response Total
1	Yes		8.43%	35
2	No		84.58%	351
3	Don't know		6.99%	29
			answered	415

3. Do you agree that the identified measure(s) are likely to achieve compliance in that way?			Response Percent	Response Total
1	Yes		8.5%	35
2	No		85.68%	353
3	Don't know		5.83%	24
			answered	412

4. Do you disagree in any respect? If so why?			Response Percent	Response Total
1	I agree		11.78%	47
2	I disagree		88.2%	352
			answered	399

5. Do you consider that any other measure or packages of measures should be included in the Final Supplemental Welsh Air Quality Plan, what are those measures and why should they be included?			Response Percent	Response Total
1	Yes		44.36%	173
2	No		55.64%	217
			answered	390

6. Do have any other comments you would like to make?	
Answered	207

4. Summary of Responses in Line with the Identified WeITAG Stage 3 Measures

The following chapter provides a qualitative review of the responses received against the measures that have been appraised and summarised in the consultation document for all five of the sites.

4.1. Enforced/Reduced Speed Limit

Support in respect of proposed measures

- 4.1.1. In total 7 respondents commented that they are in support of the reduced speed limit proposal, including Client Earth, Public Health Wales, Wrexham County Borough Council, and the Road Hauliers Association, who welcomed the proposal, commenting that the measures will have the impact required without affecting small businesses.
- 4.1.2. References were made regarding motorists non-compliance with speed limits and the need for stricter enforcement, including use of speed cameras to ensure effectiveness. The provision of enforcement cameras was recommended by 29 respondents to support the reduced speed limits.

Concerns in respect of proposed measures

- 4.1.3. The proposed speed restriction was criticised 142 respondents as they considered that lower speeds would lead to congestion which in turn will increase pollution. Concern was also raised by 49 respondents that the change in speed limit will increase pollution due to the need for additional braking and accelerating.
- 4.1.4. 29 respondents also considered that the speed limit restriction on the A483 was implemented on too short a length to have any positive effect on air quality. Concern was also raised that the speed limits are not set at a level to encourage the most efficient driving speed.
- 4.1.5. 4 respondents raised concerns about the safety implications of implementing the reduced speed limits, particularly where not enforced by speed cameras.
- 4.1.6. 28 of the respondents questioned the validity of the air quality data provided in relation to the reduced speed limits.

- 4.1.7. 25 respondents believed that the speed limit reductions have not been introduced to reduce pollution but to merely increase revenue and may not be effective in reducing pollution, and 9 respondents considered that the speed limit will have a negative effect on the economy.
- 4.1.8. There was a general consensus that the current reduction in speed seems to be causing traffic congestion, there were suggestions that the speed limit should go back to 70mph to keep the traffic moving at all times.

4.2. Air Quality Screening/Fencing/Environmental Barriers

- 4.3. No comments were received proposing the introduction of Air Quality Screening/Fencing/Environmental Barriers.

4.4. Ramp Metering

- 4.4.1. No comments were received proposing the introduction of ramp metering.

4.5. Junction closures

- 4.5.1. In response to proposed junction closures, 4 respondents considered that this would offer small benefit to the M4 whilst giving a significant disbenefit to the local network, thereby potentially increasing pollution for local residents.

4.6. Junction closures (M4 Port Talbot J41 Westbound on-slip) (with speed limit) (precautionary retained measure)

Support in respect of precautionary retained measure

- 4.6.1. 8 respondents recommended junction closures on the A494 or M4 to reduce congestion levels.

Concerns in respect of precautionary retained measure

- 4.6.2. A number of parties made reference to the previous part time slip road closure at J41 stating that this had a negative effect on the local road network which outweighed any benefit to the motorway. Other parties however, disagreed with this statement saying that closure of the junction would help to reduce congestion.
- 4.6.3. 33 respondents considered that closing M4 J41 will not change the pollution levels and this measure will only move the congestion and pollution to the surrounding areas.

4.7. Variable diversion

- 4.7.1. A single respondent commented on the A483 Variable Diversion proposal, commenting that the categorisation of the effect as largely beneficial is actually a very narrow and unrealistic assessment.

4.8. Parking Improvements

- 4.8.1. No comments were received in relation to parking management on the A470.
- 4.8.2. One respondent recommended that parking near any school should be prohibited on school days and a second proposed the introduction of free parking areas along the M4 to encourage car sharing.

4.9. Clean Air Zones/Low Emissions Zones

- 4.9.1. Public Health Wales commented that Clean Air and Low Emission Zones have potential to reduce NO₂ beyond the areas considered to be non-compliant, with improvements in public transport and incentive packages to reduce the need for private vehicles key aspects, all of which should be considered in the assessment.
- 4.9.2. Client Earth recommended that Clean Air Zones for the M4 and A470 are progressed as quickly as possible to address pollution exceedances, with liaison undertaken with the relevant local authorities to maximise the benefits.
- 4.9.3. The Road Hauliers Association recommended that Clean Air Zones be phased to support air quality objectives without major disruption to small businesses and their customers.

4.10. Distance Chevrons

- 4.11. One respondent suggested the introduction of chevrons to space out traffic.

5. Summary of Views and Comments from Commercial Entities, Non-governmental Organisations, Registered Charities and Public Bodies

- 5.1. Client Earth supported the implementation of the speed restrictions but requested that further action be taken to ensure they are enforced in order to increase the likelihood of the modelled air quality benefits being realised. Client Earth also cautioned against removing the speed restrictions when compliance is achieved as it could tip the pollution levels back into exceedance.
- 5.2. Client Earth recommended that a review of the wider local authority and government managed road network be carried out to address the risk that roads currently outside the scope of the Welsh Government Supplement to the UK Plan for tackling roadside nitrogen oxide concentrations may suffer from exceedances.
- 5.3. As noted above, Client Earth also urged that Clean Air Zones on the M4 and A470 be progressed as soon as possible and broadly supported the proposed introduction of softer measures to raise awareness about air pollution.
- 5.4. The Institution of Civil Engineers (ICE) did not support the proposed measures because of the little regard given to the existing traffic congestion at many of the sites; considering that reducing the number of slow moving diesel vehicles would reduce NO₂ levels at the same rate.
- 5.5. The ICE proposed a number of alternative measures for consideration, including the provision of alternative routes, implementation of national fuel quality standards and promotion of alternative modes of transport.
- 5.6. As noted above the Road Hauliers Association welcomed the proposal, commenting that the measures will have the impact required without affecting small businesses.
- 5.7. Public Health Wales supported the assessment and the proposed measures, as well as the air quality monitoring and evaluation plan, recognising the pragmatic approach proposed to ensure compliance in the shortest time possible. Public Health Wales also commented that they would have liked to have seen the “soft measures” implemented at the same time as the speed limits to better inform road users and residents affected by poor air quality.
- 5.8. As noted above Public Health Wales consider the wider environment beyond the areas considered non-compliant should be considered in the assessment with regards introduction of Clean Air and Low Emission Zones.

6. Summary of Responses for Additional Consideration and Comments

- 6.1. 105 respondents explicitly referred to the emissions produced by industrial sites in close proximity to the identified measures, such as the Kronospan in Flintshire as being of more concern than pollutants emanating from vehicles on the road. Of the 105 respondents, 87 respondents highlighted the steelworks at Port Talbot with many respondents considering this to be the primary cause for air pollution in the area. 17 respondents consider that the pollution levels can be attributed to various other factors and not just vehicular speed or congestion.
- 6.2. It was suggested by 7 respondents that variable speed limits should be implemented at the M4 motorway sites, so as to limit speeds only during peak hours.
- 6.3. Recommendations were also made to increase the speed limit from 50mph to 60mph or 70mph were made, so as to reduce congestion levels, however, some respondents called for the expansion of the 50mph zones to reduce congestion.
- 6.4. It was also recommended by 13 respondents to increase the number of lanes on the motorway to reduce congestion, and 3 respondents recommended the introduction of a congestion charge.
- 6.5. Recommendations were made to increase electrical car charging facilities to encourage more people to change to electric vehicles.
- 6.6. 19 respondents also considered that HGVs should be targeted as they tend to produce more emissions than passenger cars and also older diesel, suggestions were also made to limit HGV time on the road, specifically during peak hours.
- 6.7. It was also suggested at a number of sites, including M4 Port Talbot and A494 Aston Hill that other nearby pinch points/bottle necks equally contribute to pollution and should also be considered for improvement measures, or should be addressed before the identified sites.
- 6.8. 32 respondents considered investment in public transport as being more beneficial than the current measures.
- 6.9. As noted above, 8 respondents recommended closing junctions on the A494 or M4 to reduce congestion levels.
- 6.10. 31 respondents suggested doing nothing at the identified sites and investment of the funding should be in other areas of the economy such as the NHS, schools and pot hole repair.
- 6.11. There were various suggestions to provide solutions for better infrastructure to address bottle necks, especially in locations such as the Dee Bridge and the Wrexham to Chester Bypass (amongst others).

- 6.12. Poor driving was considered an issue by several respondents which they considered if addressed would contribute to a reduction in pollution levels and there were also suggestions to plant more trees/oxygenating plants.
- 6.13. The suitability of the location of the monitoring stations were questioned by three respondents with comments provided that they are located too far from the road, residential area or school and are also unable to prove the origin of the NO₂.
- 6.14. 10 respondents commented that the hard shoulder should be used as a running lane to ease congestion.
- 6.15. Wrexham CBC confirmed their support for any scheme that will demonstrate an improvement to the health of its residents and visitors. Wrexham CBC also commented that there is a lack of definition in the current monitoring data as to whether the perceived breach of air quality objectives is occurring at sensitive receptors or on the A483 itself.
- 6.16. Wrexham CBC also recommended that the evaluation of the 50mph zone be repeated with enforcement to confirm if the proposed intervention will be effective prior to major capital expenditure.

7. Next Steps

- 7.1. The Welsh Government would like to thank those that responded to the consultation.
- 7.2. The responses made will be carefully analysed and considered in the development of the final Welsh Government Supplemental Plan which is due to be published on the 30th November 2018.
- 7.3. Comments that have been made in relation to the wider issues on air quality within Wales will be passed to the appropriate Welsh Government department for information and consideration.