

Ein Cyf /Our Ref:
Eich Cyf /Your Ref:
Dyddiad /Date:
Gofynnwch am/Please ask for:
Llinell uniongyrchol/Direct line:
Ebost/Email:

ST/SJW/AQ
06/08/18
Steve Thomas
029 2046 8610
steve.thomas@wlga.gov.uk



Mr David J Rowlands AC/AM
National Assembly for Wales
Petitions Committee
Cardiff Bay
Cardiff
CF99 1NA

Dear Mr Rowlands AC/AM,

Petition P-05-825 Protect children's lungs from harmful pollution whilst at school

The Welsh Local Government Association (WLGA) is committed to assisting local authorities work to achieve cleaner air for all our communities.

As such, we are engaged with the Wales Air Quality Forum, the All Wales Expert Panel for Air Quality, and the Directors of Public Protection Wales, who collectively work to inform policy and action, at a local and a Wales level.

In June 2018, the WLGA also accepted an invitation to participate in the Healthy Air Cymru debate to mark Clean Air Day, an event hosted by David Melding AM.

In conjunction with the Directors of Public Protection in Wales, we agree that everybody needs to reduce their exposure to air pollution. We believe that more could be done to protect the health of the population, in particular children, from the potential harm caused by poor air quality.

Monitoring of school sites

However, we do not consider that monitoring air quality outside all schools will necessarily help inform the right policies.

For the vast majority of schools in Wales the air-quality during the route to school is much more important than at the school itself. There is a need to work on better systems to inform parents (hopefully in real-time) on the best route to school with the lowest

Steve Thomas CBE
Prif Weithredwr
Chief Executive

Cymdeithas Llywodraeth
Leol Cymru
Tŷ Llywodraeth Leol
Rhodfa Drake
CAERDYDD CF10 4LG
Ffôn: 029 2046 8600

Welsh Local Government
Association
Local Government House
Drake Walk
CARDIFF CF10 4LG
Tel: 029 2046 8600

wlga.cymru
wlga.wales

@WelshLGA

**Croesawn ohebiaeth yn y Gymraeg a'r Saesneg a byddwn yn ymateb i ohebiaeth yn yr un iaith.
Ni fydd defnyddio'r naill iaith na'r llall yn arwain at oedi.**

**We welcome correspondence in Welsh and English and will respond to correspondence in the same language.
Use of either language will not lead to a delay.**

exposure for that day. Reducing the impact of the “school run” is another key issue.

Wider considerations regarding public policy also have a potential impact here. The trend toward smaller numbers of larger schools mean that children are travelling greater distances to reach school with a consequent increase in reliance on cars and buses and increasing challenges to the promotion of cycling and walking.

Wellbeing of Future Generations

The health consequences of public policy decisions need to be better considered in the round, particularly in the context of Health Impact Assessment and the Wellbeing of Future Generations Act.

Outside the school gate there may well be a brief exposure to nitrogen dioxide and fine particles depending on the parking arrangements and the local topography.

Government Guidance

Local authorities have a statutory duty to monitor air quality in their area and they all meet this responsibility. How this is carried out is shaped by detailed government guidance. Our screening techniques can only measure long-term averages, but this approach is based on good scientific advice to identify areas where exposure is likely to be significantly elevated. This does consider many previous studies to compare peak values with average values and does allow a fairly big safety margin to make sure that we are not missing sites that we should be assessing.

Ongoing assessment

Any school in Wales with a reasonable traffic flow on the road outside will have been assessed already by the local authority and data will have been gathered for at least 12 months. If we are no longer measuring at that school, it is because the current air-quality is well below the target value.

Fortunately, there are only a small number of schools in Wales where air-quality on the site itself is still a concern. There are some projects underway where we are looking at short-term fine particle measurements at schools. These are reliant on collaboration with Swansea University otherwise those local authorities could not justify the cost of the monitoring equipment.

Welsh local authorities would far rather concentrate efforts on work that would reduce the impact of the school run and give parents better information about their child's exposure during that journey.

There are also policy issues to consider around staggering school times and sharing school transport contracts. Simply measuring nitrogen dioxide outside schools using current technology could create the false impression that children are generally not affected by vehicle emissions.

Active Travel

There are several activities or steps that councils undertake, or are planning, in relation to active travel and the promotion of sustainable transport that are relevant to the issue of air quality around schools. These include engineering, educational and enforcement measures.

'Engineering' measures include:

- Land use planning whereby new housing areas and schools are designed to incorporate safe routes which can encourage walking and cycling to school
- Installation of charging points for electric vehicles (EVs) to encourage take-up of EVs (see e.g. [Swansea - More charging points in pipeline to cater for electric vehicles](#); [Cardiff bids for funds to bring in more electric car charging points - Wales Online](#); [Wrexham: Electric car charge points expansion plan for town | The Leader](#))
- provision of home-to-school transport, which reduces the number of car journeys required
- installation of traffic calming measures which improve safety and can encourage motorists who are not on a school run to take alternative routes (where available)
- use of speed limits around schools which improve safety (including deterrence of non-school traffic) and can thereby contribute to efforts to get children to walk and cycle
- actions arising from the Active Travel (Wales) Act 2013.

Integrated Network Mapping

In relation to the Active Travel Act, all local authorities were required to produce Integrated Network Maps. These set out walking and cycling routes that councils will seek to deliver over the next 15 years.

An active travel journey is defined as: "a journey made to or from a workplace *or educational establishment* or in order to access health, leisure or other services or facilities"¹. In developing their active travel plans, therefore, journeys to school will have been an important consideration.

As such routes are developed, the intention is that more children will be encouraged to walk or cycle to school. This will reduce congestion at drop-off and pick-up times, thereby improving air quality in the vicinity.

Education

As well as physical measures to improve routes, councils also undertake **educational** activity in relation to road safety (which can be aimed at drivers as well as children – e.g. through eco-school activity on car sharing and 'no-idling' campaigns).

As part of this, a number of councils and schools encourage walking to school, including the use of 'walking buses' whereby children walk to school accompanied at the front and rear by volunteers (after relevant risk assessments and checks have been undertaken) – see for example:

¹ <https://beta.gov.wales/sites/default/files/publications/2017-09/statutory-guidance-for-the-delivery-of-the-active-travel-wales-act-2013.pdf> (page 5, emphasis added).

[Best Foot Forward in Caerphilly](#)

[Walk to School](#) (Carmarthenshire)

[Welsh school awarded for encouraging pupils to cycle, walk and scoot the school-run | Sustrans](#) (Denbighshire)

[Severn Primary School take up the challenge | Living Streets](#) (Cardiff)

Enforcement

On the **enforcement** front, physical measures such as traffic calming can be 'self-enforcing' in terms of limiting speed. Measures sometimes include planting schemes, which can themselves contribute to air quality.

In some cases, repeater signs are used to highlight driver speed and councils can also work with Go Safe, the road safety camera partnership in those cases where cameras (fixed or mobile) are considered necessary.

We hope that this information will assist the work of the Committee. Please contact the WLGA again if you require further information or assistance.

Yours sincerely,



Steve Thomas CBE

Prif Weithredwr/Chief Executive

Croesawn ohebiaeth yn y Gymraeg a'r Saesneg a byddwn yn ymateb i ohebiaeth yn yr un iaith.

Ni fydd defnyddio'r naill iaith na'r llall yn arwain at oedi.

We welcome correspondence in Welsh and English and will respond to correspondence in the same language.

Use of either language will not lead to a delay.