

Fine particulate matter air quality targets

Q1. Question 1a: To what extent do you agree with the level of ambition proposed for the Annual Mean Concentration Target (AMCT)?

Strongly agree

Q2. Question 1b: Please explain your answer

We support the ambition set out for the AMCT. The significant and well established health impacts associated with long term exposure to PM2.5 justify a proactive and precautionary approach. Setting clear, ambitious targets is essential to drive improvement and deliver public health benefits. However, we would welcome further clarity regarding the practical implications of delivering and monitoring this target at a local level. In particular:

- The resource requirements for increased monitoring, modelling and assessment are currently unknown.
- It is unclear what support, guidance and investment will be provided to local authorities to meet these obligations.
- The consultation does not yet fully describe what intervention powers or duties local authorities will have if exceedances are identified.

Ambition is welcome, but must be matched by a realistic assessment of capacity, funding and available tools.

Q3. Question 2a: To what extent do you agree with the level of ambition proposed for the Population Exposure Reduction Target (PERT)?

Strongly agree

Q4. Question 2b: Please explain your answer.

We agree with the proportionate and preventative approach underpinning the PERT, particularly its focus on reducing exposure across the entire population not only in hotspot locations. This reflects a fairer and more holistic public health strategy.

However, there are concerns regarding the practical implementation of case by case assessment at a local authority level. To support effective delivery, we request:

- Greater transparency on how baseline exposure levels are defined
- Clear worked examples of how the PERT should be calculated in different real world scenarios (e.g., rural vs urban settings).
- Guidance on the frequency and methods for recalculating exposure baselines.
- A clear explanation of local authority responsibilities where PERT changes are outside our direct control.

This additional information is essential to ensure consistency and fairness across Wales.

Q5. Question 3a: To what extent do you agree with the proposed arrangements for assessing PM2.5 levels and achievement of the targets?

Strongly agree

Q6. Question 3b: Please explain your answer.

We support the proposed arrangements, particularly the provision allowing the subtraction of natural contributions such as sea salt, desert dust or other naturally occurring particulates. It would be unreasonable to require authorities to take action on sources outside any reasonable sphere of control. We also see an opportunity for closer collaboration with Local Health Boards. Incorporating health related data such as local population sensitivity, prevalence of respiratory and cardiovascular conditions, and vulnerability indices would strengthen assessments and allow for more targeted interventions where public health impacts are greatest.

Q7. Question 4a: To what extent do you agree with the provision in the draft regulations to allow the subtraction of the 'natural contribution' to particulate matter where exceedances of a target are due in whole or in part to these natural contributions?

Strongly agree

Q8. Question 4b : Please explain your answer.

This is a common sense and scientifically justified approach. Local authorities can only influence and act upon emissions that are within our control or those produced by anthropogenic activities. Exceedances driven by uncontrollable natural events should not trigger regulatory duties, enforcement expectations or negative performance assessments.

Q9. Question 5: We have asked some specific questions. If you have any other relevant thoughts or comments on our proposals, please provide them here.

The most significant concern is resources. The ambition of the proposed PM2.5 targets is welcome, but achieving them will require substantial investment in:

- Monitoring infrastructure
- Modelling and assessment tools
- Technical expertise and staffing capacity
- Public health partnership work
- Community engagement and behaviour change initiatives

Welsh Government must acknowledge that the introduction of more aspirational statutory targets needs to be matched with adequate, long term resourcing, otherwise local authorities will struggle to meet expectations or deliver improvements consistently across Wales.

Submit your response

Q10. Please provide the first part of your home postcode e.g. CF10

[information redacted]

Q11. You are about to submit your response. Please ensure you are satisfied with the answers you have provided before sending.

Name [information redacted]

Organisation (if applicable) Cyngor Sir Gar

Q12. If you want to receive a receipt of your response, please provide an email address.

Email address

[information redacted]

Q13. Responses to the consultation may be published. Your response will be anonymous.

However, if you would like your name to be published alongside your response, please tick the box.

No Response

Redacted information - regulation 13 - personal data.

