



**Chartered
Institute of
Environmental
Health**

**Submission to Welsh Assembly Government
on consultation on
Environment Strategy for Wales**

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THE CHARTERED INSTITUTE OF ENVIRONMENTAL HEALTH

Founded in 1883, the Chartered Institute of Environmental Health (CIEH) is a professional and educational body, dedicated to the promotion of environmental health and to encouraging the highest possible standards in the training and the work of environmental health professionals.

The Chartered Institute has approximately 10,000 members, most of whom work for local authorities in England, Wales and Northern Ireland. As well as providing services and information for its members the Chartered Institute provides information to government departments and evidence to them on proposed legislation relevant to environmental health.

In 1993 the Chartered Institute became the World Health Organisation Collaborating Centre for Environmental Health in Europe.

In 2002 the Chartered Institute established a regional office in Wales in order to facilitate direct liaison with the National Assembly for Wales, local authorities and non-governmental organisations within Wales, promoting and representing Chartered Institute of Environmental Health policies in a Welsh context.

The Chartered Institute of Environmental Health (CIEH) welcomes the opportunity to comment on this important consultation. We provide below our responses to the questions asked in the order of raising, however are happy to provide further information or to comment further should our further views be required.

Chapter 3 – Climate Change

CC1: Will the actions described in the sections above enable us to deliver our key outcome in relation to reducing our contribution to climate change?

Proposed outcome:

- **Wales' contribution to climate change has reduced significantly.**

The actions proposed will contribute to Wales reducing its contribution to climate change, however the degree of reduction may not be significant.

CC2: If not, what else needs to be done by government, individuals and other organisations? Should there be a focus on particular emissions sectors?

The greatest gains will be made in the areas of potential growth. It is clear that the greatest areas of emissions are from road traffic and from the growing use of air transport. It will be hard to engage the public, and to drive them to changing energy use habits if these two key areas are not addressed.

There needs to be a great focus on the use of public transport, by delivering an integrated public transport scheme, that is not only integrated but is clean, safe to use and reliable. Individuals will only commit to using public transport if they feel that they can rely on it delivering them to their destination in accordance with its advertised programme, and this system need only fail a few times for individuals to lose confidence in it and to revert to private transport. The system must also be safe, for individuals traveling alone, and this must also include the immediate environment of the transport scheme – railway stations and bus stations for the individual user to be confident of their safety for the whole of their journey.

Government, through local government should provide better facilities for car sharing – we know that some individuals will continue to travel to work by car, but we should take steps to make car sharing easier – park and car share car parks provided by major road junctions, where parked vehicles can be secured rather than parked on public roads. These car parks could be revenue raising, provided this was not taken to the point where car sharing became uneconomic, and the use of the car parks and could also be used as a measure of success of the scheme.

Congestion charging should be considered for the larger towns and cities in Wales to cut the number of vehicles driving at low speeds in crowded areas. This should however be linked to elements of the integrated transport infra structure, so that individuals will be confident that they can leave their vehicles at a central point and can continue to the centre of the city or town by public transport, thereby avoiding the congestion charges but also by reducing traffic in the town.

There also needs to be a continuing focus on domestic energy use. There can be no question of energy pricing to make energy use price controlled, since such a course of action would have its greatest impact on those groups having greatest need, however continued efforts should be made to reduce domestic energy use. This should be both by encouraging domestic energy and also through encouraging manufacturers to produce energy efficient

goods and equipment. Domestic users will not however reduce energy use where there is conspicuous use in other areas, which may make any reduction made by them seem small and meaningless. Regard must be had to conspicuous energy use by other sectors – e.g. lighting of shopping centers at night after shops close etc, which may lead to disenchantment amongst domestic consumers.

It is difficult to see how reductions can be made in air travel, with the advent of low cost airlines and the increasing popularity of short haul short breaks and of air travel within the UK to and from regional airports, however this area is one where the potential for reduction is considerable.

It is essential that the International Airport is served by good integrated transport links to reduce reliance on the private car to travel to the airport.

CIEH suggests that greater use of Information Technology should be encouraged to reduce business travel – for example the use of video conferencing. Facilities should be available to allow this to take place easily – such as the provision of video conferencing suites in WDA Business Centres, libraries and other facilities on a hire by the hour basis.

CIEH suggests that the setting of targets is not a useful mechanism, since achievement of targets leads to a belief that enough has been done and subsequent disengagement. There should be continuing pressure to reduce energy use to as low a level as is achievable.

CC3: What would be an appropriate indicator of success and how could we measure it?

Success will clearly include a reduction in energy use, which reduction is measurable and quantifiable.

Success will also be achieved if there is a general move towards better use of energy and increased realisation of the need for better and more economical energy use. This will be demonstrated by the manufacture and sale of more energy efficient products, and by the development of innovative energy saving schemes which are adopted.

CC4: How high a priority is this activity (low, medium or high)?

This activity must be a high priority. Climate change is the biggest global challenge we have had to face, and we must take steps to reverse the damage already done as quickly as possible.

Proposed outcome:

• **Improved resilience to the impacts of climate change and with flexible measures in place to adapt to future changes.**

CC5: What needs to be done by government, individuals and other organisations to achieve this?

Government must ensure that planning guidance directs development in such a way as to promote resistance to the impact of climate change, e.g. there should be a presumption against new development on natural flood plains, which may flood on a more regular basis in consequence of climate change.

Planning policy guidance should also require construction of energy efficient buildings, which are warm in cold weather but are also cool in hot weather, and do not require large amounts of energy to sustain their temperature.

Government must ensure that developers and builders follow the guidance by directing planning authorities to follow the guidance other than in exceptional circumstances, to ensure that development by planning appeal does not overtake the presumptions in the guidance.

There should also be government support for forestry planting schemes that help to prevent soil erosion, planting to be with native species to encourage the proliferation of native fauna and flora by habitat provision.

Introduction of new crops should be monitored by DEFRA to ensure that they are not highly nutrient demanding when compared to native crops, and to ensure that the introduction of such crops does not also introduce pest species with no natural predators which may have a server adverse effect of native fauna or flora. The precautionary principle must guide and inform such deliberations.

Areas at risk from flooding or from landslips should be identified and action should be taken to prevent the risks manifesting themselves. Flood barriers, diversion measures and measures to prevent land slips, such as provision of gabions and tree planting to provide root adhesion should be put in place as quickly as possible. If these measures are in place householders and owners of commercial property find insurance easier to access and more affordable and are therefore protected to some degree in the event of a flooding or land slip incident.

Local Government must ensure that its emergency plans are in place to cope with natural disasters flowing from the results of climate change, such as flooding incidents or landslips. It is in such incidents that the vulnerability of individuals is exposed and it is imperative, if the public is to have confidence in the measures that are being put in place and belief in the need to make such changes to life style and behaviour, that they can see the benefits of so doing.

We repeat our comments about private vehicle use in this section, since emissions from private vehicles are one of the causes of climate change, and note that steps must be taken to encourage individuals to reduce private car use.

In response to rising temperatures Government must also provide robust advice about appropriate behaviour in times of extreme heat. This may include advice about changing work patterns to work in the cooler parts of the day, seeking shade, providing ventilation, protecting the very young and the elderly and what steps should be taken in the event of an individual being overcome by heat.

Hotter longer summers will give rise to increased risk of skin cancer, and robust advice must be provided as to how to reduce the risk of skin cancer and how to detect early signs of the disease. The NHS must have the capacity to deal with the potential increase in patient presenting with skin cancer.

CC6: Should certain sectors be a priority for planning climate change adaptation measures?

In the view of the CIEH the land use planning and development sectors should be a priority for planning climate change adaptation measures, since inappropriate development and development in inappropriate land can lead to vulnerability during climate change related incidents. Vulnerable land should be identified, and development precluded.

Land at risk of flooding and of landslips should be identified by the same sector and amelioration measures put into place.

Transport planning must also be a priority, since a robust and efficient integrated transport system is essential if private motorists are to be encouraged to adapt their behaviour such that they leave their vehicles and to use public transport.

CC7: What would be appropriate indicators of success and how could we measure them?

Appropriate measures of success in the short term will be reduction or elimination of flood damage in the event of high rainfall.

In the long term, and assuming no reduction in climate change, or the worst case scenario of further detrimental climate change success would be measured by the absence of flooding or landslip incidents in Wales notwithstanding the likely increased incidence of high rain fall, and by few or no heat related death in periods of extreme hot weather.

CC8: How high a priority is this activity (low, medium or high)?

The short term activities are high priority, as we already have evidence of damage to land and property caused by flash flooding.

The changes proposed to Planning Policy Guidance is also short term, because the effects of adopting the guidance will take time to work through, and must therefore be commenced at the earliest opportunity.

The transport planning initiatives are already in hand, but must be given continuing support, as the adverse effect of motor vehicle use is making a major contribution to climate change.

Chapter 4 Managing the Land and Sea

LS1: Will the actions described above enable us to deliver our key environmental outcome for the land and the sea?

Proposed outcome:

- **A integrated, flexible approach to the management of the land and sea will be in place to ensure that they can support our environmental, economic and social needs while retaining their essential character of and biodiversity**

It is the view of the CIEH that the measures proposed will enable delivery of the stated key outcome.

It is the case that for proper management of the land and the sea a joined up approach is required, and the current management plans and those in development are joined up. This will ensure that any impacts from them are fully assessed before the plans are implemented. Remediation should always be the last resort.

We are however clear that there must be a strong presumption in favour of measures proposed in the plans, with deviation being the exception, not the norm. Management by exception will inevitably have adverse effects and should be resisted by the Welsh Assembly Government and those agencies charged with delivering the plans.

LS2: If not, what else needs to be done by government, individuals and other organisations?

In the light of the foregoing answer, no response is made to this question.

LS3: How can we better understand the potential impact of different management choices and how can we decide what sort of landscape and marine environment we want to achieve through management?

As noted above Environmental Impact Assessments and Integrated Impact Assessment should be carried out before any management choices are made. These tools will identify all potential costs and benefits of the choices proposed, and allows for amendment of schemes to minimize adverse effects prior to implementation. Where it is clear that research is required to better inform the assessment this should be commissioned before any action is taken.

LS4: Do you support our proposed aim for the marine environment on page 55?

Yes.

LS5: What would be appropriate indicators of success and how could we measure them?

Indicators of success are that the sea should be clean and should contain healthy, functioning ecosystems that are biologically diverse as stated in the proposed aim. Both of these aims are clear and measurable, subject to appropriate base line information being known. The productivity of the sea is measurable, success will be productivity being maintained or improved, subject to improvement in productivity having no long term effects on the ecosystem. Resilience is demonstrated by the use and productivity of the sea being maintained notwithstanding and adverse incidents that may affect it - such as chemical or oil spills etc.

LS6: How high a priority is this activity (low, medium or high)?

Protecting our marine environment must be a very high priority. We know that the marine ecosystem has a natural resilience, the recovery of the sea and the coast line after the Sea Empress oil tanker disaster is a clear example of this, however we also know that recovery from over fishing can be long, and can cause economic hardship to those relying on the sea for a living. A healthy marine environment is also essential for tourism, both to holiday makers and to wild life and bird watching tourists.

A healthy marine environment is critical for the wildlife that lives in it, as was demonstrated by the sand eel crash in 2004 and the marine bird breeding failure that followed it. Species once lost are hard to recover, as their place in the ecosystem is taken by other species. For these reasons protecting our marine environment must have a high priority.

Our comments in respect of the urban environment and the countryside are contained in the relevant chapter.

Chapter 5 Sustainable use of Resources and Ecosystem Services

RES1: Will the actions described throughout this section enable us to deliver our key outcomes for sustainable material use?

Proposed outcomes:

- **Reduce, re-use and re-cycle is universally accepted and becomes ‘normal behaviour’ for government, business, industry and home life**
- **The increase in household municipal waste has stopped and reversed**
- **Business produces well designed products that maximise resource efficiency and reduce waste during their production, use, and end of life requirements**

In the view of CIEH these actions, as described, will assist in delivering the key outcomes for sustainable material use. We do not take the view that the actions described will be enough, on their own, to achieve the target.

RES2: If not, what else needs to be done by government, industry, individuals and other organisations?

We believe that not enough is being done to make household recycling the norm rather than as something undertaken by high minded individuals as a life style choice. If the Welsh Assembly Government is to achieve its key target of universal acceptance firmer drivers are needed. We do not support financial disincentives such as have been proposed in the past, such as charging for more than one domestic refuse bin, but rather incentives, such as local money gained from recycling being spent on local projects, to bring home the benefits of recycling in a real and tangible context.

Industry and retailing must be forced to consider the use of packaging materials, particularly since much packaging is polythene, which requires oil for its manufacture. Consideration should be given to a levy on carrier bags, such as that introduced in the Republic of Ireland.

Individuals must understand how the effect of their use of resources. Publicity of the type used to promote giving up smoking should be used to demonstrate what consequences flow from use of resources and how the consequences can be eliminated by better practice. Individuals must understand that each has a personal responsibility to recycle and reuse, and to make recycling part of their daily lives. To this end it must be made easy for them to do so, such that the process of recycling is not seen as a chore.

RES3: What would be appropriate indicators of success and how could we measure them?

Success is a reduction in material going to landfill and a corresponding increase in material being reused or recycled. These figures are collectable, the landfill figures to date being available already, and volume of material collected for recycling also being available.

Success is also indicated by new materials coming onto the market which are made from or contain recycled materials. As these will be one off occurrences they cannot strictly be measured, but their coming onto the market can be acknowledged. These new materials may be either for use in manufacturing, construction or for sale to the general public.

RES4: How high a priority is this activity (low, medium, high)?

Encouraging the public to reuse, recycle and compost is important, however this work is already underway, and has fallen largely to local authorities. Continued support is needed for this work, but in the view of CIEH this is a medium priority.

Support may be required for research into finding alternative uses for material that has passed its original use. This should be supported through grants, and is seen as a medium priority, since industry will finance research that it considers will give it commercial success and financial reward.

RES5: Will the actions described throughout this section enable us to deliver our key outcomes for water resources and water quality?

Proposed outcomes:

- **Water resources are managed sustainably meeting the needs of society without causing damage to the environment**
- **Water is used more efficiently across all sectors**
- **The high quality of our drinking water is maintained**

The quality of our rivers, lakes and coastal waters is maintained and enhanced

- **Diffuse pollution is better understood and action is being taken to reduce the causes of diffuse pollution**

The proposed actions are seen as contributors to achieving the key targets. Some responsibility for maintaining water stocks and ensuring its efficient use lies with the water companies who are responsible for the repairing of leaks to supply pipes. It is difficult to see how an argument can be made that water can be conserved by the public turning off taps whilst cleaning their teeth when water companies acknowledge that they have a number of leaking pipes and are slow to repair those reported by the public. Whilst it is accepted that the water companies are upgrading their systems and are seeking to prevent flooding incidents and river contamination, they must also take responsibility for preserving water, particularly where it has been cleaned to drinking water standards.

The report also fails to consider increased use of grey water for processes that do not require water of drinking water quality.

CIEH is concerned that the Consultation on Catchment Sensitive Farming relies on the co-operation of farmers to ensure that water catchments are not polluted by animal waste or farm chemicals. Given that one pollution incident can destroy invertebrate life and subsequently fish life for considerable periods it is our view that a more robust stance should be adopted to require compliance.

RES6: If not, what else needs to be done by government, water companies, individuals and other organisations?

Government and the water companies need to promote and encourage the use of grey water. This could be used for flushing of lavatories and for industrial processes where the presence of water rather than its quality is important, e.g. for cooling purposes. New buildings should have a facility to collect and use grey water, and it should be used where practicable for irrigation of crops.

CIEH supports the increased use of SUDs and would encourage their promotion as alternative disposal systems, particularly for grey water systems.

RES7: What would be appropriate indicators of success and how could we measure them?

Indicators of success are reductions in water loss through pipe leakage, measured in volume. A reduction in water use per head of population in Wales could also be considered as an indicator of success, however some adjustments to a basic figure would have to be made to take account of use by visitors etc.

Increased use of grey water and increased use of SUDs could also be used as indicators of success, measured against a target figure to be set on an annual basis.

RES8: How high a priority is this activity (low, medium or high)?

Wales is not presently short of water, although natural storage capacity is limited. It is therefore suggested that, other than for the need to ensure urgent repairs and upgrading of supply pipes, this matter is of medium priority.

RES9: Will the actions described throughout this section enable us to deliver our key outcomes for soils?

Proposed outcomes:

- **Soil resources are better understood and managed sustainably through the adoption of good land management practices**
- **The extent of soil contamination is better understood and actions are being taken to remediate contaminated land for beneficial use**

In respect of preventing erosion and soil compaction, yes.

In respect of remediation of contaminated land and its restoration to the land bank, no. Given the pressure on land and the desire of the population to live in particular areas it is essential that contaminated land is remediated and brought back into use as brown field development land. Local authorities have responsibility for enforcement of the contaminated land regime, but are not provided with sufficient financial resource to tackle the problem in a comprehensive way. To reduce pressure on green field land it is essential that all potential sources of land are exploited, and to this end all contaminated land, particularly that which is historically contaminated and for which a responsible owner cannot be found, must be brought back into use.

RES10: If not, what else needs to be done by government, individuals or other organisations?

Local authorities must be provided with sufficient financial resource to properly address the issue of remediation of contaminated land.

RES11: What would be appropriate indicators of success and how could we measure them?

Hectares of brown field land being used for development, and hectares of contaminated land coming back into the useable land bank are both measurable indicators of success.

RES12: How high a priority is this activity (low, medium or high)?

Both the remediation of contaminated land and the presumption in favour of brown field development are already in place, therefore we suggest that their incremental improvement should be of medium priority.

RES13: Will the actions described throughout this section enable us to deliver our key outcome for minerals and aggregates?

Proposed outcome:

- **Extraction of minerals and aggregates will balance current needs for economic development, with protection of the environment, securing supplies for future use and the impact on local communities**

Yes.

RES14: If not, what else needs to be done by government, individuals and other organisations?

This part of the consultation has failed to take account of the role of recycled aggregates and the use of reclaimed material. The CIEH suggests that there should be greater use of reclaimed material to reduce the need for virgin material. Planning conditions on new development should require the use of reclaimed material, preferably generated on the site where demolition is an element of the development.

RES15: What would be appropriate indicators of success and how could we measure them?

Reduction in the use of virgin minerals and aggregates measured in tonnes extracted without hindrance to development, reliance instead being placed upon reclaimed and recycled materials.

RES16: How high a priority is this activity (low, medium or high)?

Medium.

RES17: Will the actions described throughout this section enable us to deliver our key outcome for fish stocks?

Proposed outcome:

- **Marine and freshwater fisheries are improved and maintained through sustainable management'**

Subject to the success of the Sustainable Fisheries Programme, yes.

RES18: If not, what else needs to be done by government, individuals and other organisations?

No comment.

RES19: What would be appropriate indicators of success and how could we measure them?

No comment.

RES20: How high a priority is this activity (low, medium or high)?

No comment

Chapter 6 Biodiversity

BIO1: Will the actions described above enable us to deliver our key outcomes for biodiversity?

Proposed outcomes:

- **the loss of biodiversity has been halted and we can see a definite recovery in wildlife, in particular those species that need very specific conditions to survive**
- **better habitat management practices will be in place and habitat fragmentation will be reduced**
- **the wider environment in Wales will be more favourable to supporting biodiversity and resilient enough to cope with the challenges of climate change**
- **impacts on biodiversity will be integral in the decision making process for all policies and activities**
- **sites of international, Welsh and local importance will be in favourable condition to support the species and habitats for which they have been identified and other species of high conservation value**
- **a co-ordinated, joined up approach to biodiversity management will be in place.**

Other than in respect of the effect of pollution on biodiversity this area is not the core business of CIEH. Our comments are therefore restricted to issues affecting biodiversity arising out of pollution incidents.

Considerable pollution arises, as noted, from vehicle emissions. We refer to our comments made earlier in this response in respect of reducing reliance on private motor vehicles. We further support the development of alternative technology vehicles which produce reduced and less harmful emissions.

As noted earlier in this response we are concerned at incidents of pollution that damage the fauna of watercourses and thereby affect wildlife that requires micro and invertebrate fauna to sustain it. We support the concept of Catchment Sensitive Farming in upland water catchments areas, but further are concerned at any pollution incidents from farms and farming activities. Whilst we accept that many of these incidents are accidental it is essential that these are prevented where possible. To that end we support the use of environmentally friendly artificial fertilizers and the safe compounding of animal waste to prevent water course contamination.

BIO2: If not, what else needs to be done by government, individuals and other organisations?

No comment

BIO3: What would be appropriate indicators of success and how could we measure them?

No comment

BIO4: How high a priority is this activity (low, medium or high)?

No comment

Chapter 7 Quality of Life

QL1: Will the actions described above enable us to deliver our key environmental outcomes for the built environment?

Proposed outcomes:

- **our urban spaces will be high quality and vibrant, supporting strong communities**
- **buildings in Wales will meet high environmental quality standards**

Yes. Planning Policy Wales addresses all of those issues that will enable the delivery of the key objectives. We note however that it is critical that this document is read alongside other relevant strategies such as the local Crime and Disorder Strategy, since reductions in the levels of crime and the fear of crime are also essential to improving quality of life.

We support the regeneration of buildings and the preservation of communities, and further support the reuse of commercial buildings for commercial and for residential use.

QL2: If not, what else needs to be done by government, individuals and other organisations?

No comment.

QL3: How high a priority is this activity (low, medium or high)?

No comment.

QL4: Will the actions described above enable us to deliver our key environmental outcomes for the urban green spaces and access to the countryside?

Proposed outcomes:

- **there will be good access to the countryside and coast and ample green space in urban areas and everyone will be encouraged to use the outdoors for recreation and to enhance health**
- **our use of the natural environment for recreation and health benefits will be sustainable and lead to environmental improvement**

Yes. We have some concerns regarding access to the country side, and support the proposal that everyone should have footpath or cycle path within 10 minutes of their door step. It is imperative that access to the countryside should not be by private motor car, unless this is unavoidable.

We particularly support the idea that the outdoors should be used for recreation and for enhanced health, and the move to promote walking and cycling. This is timely in the light of Health Challenge Wales.

QL5: If not, what else needs to be done, by government, individuals and other organisations?

No comment

QL6: What would be appropriate indicators of success and how could we measure them?

Indicators of success are higher levels of usage of the countryside and the coast for recreational purposes. This is measurable in footfall. There will be incidental health improvements, but we suggest that it would be too difficult to measure such health gains.

QL7: How high a priority is this activity (low, medium or high)?

The countryside has been opened up to a greater degree than previously by the Right to Roam. There is also an extensive network of public footpaths as well as the Coastal Footpath in West Wales. We support the promotion of further opening of the countryside both for health and for environmental reasons, but suggest that as much of the work necessary in this regard is already in hand it should have a medium priority.

QL8: Will the actions described above enable us to deliver our key outcome in relation to litter, flytipping, dog fouling, light pollution and neighbour noise?

Proposed outcome:

• our cities, towns, villages and countryside will be clean and well maintained. Litter, graffiti, dog fouling, neighbour noise and light pollution will be minimized

We consider it unlikely that the actions discussed will enable the Welsh Assembly Government to achieve these key targets.

It is noted that flytipping is a major problem in Wales. The CIEH agrees with this statement, but notes that regulations imposing charges for the disposal of asbestos, and in some cases the policy decision of local authorities to charge for the receipt and disposal of bulky waste is in part to blame for this. We firmly endorse the policy of prosecuting offenders and agree that resource should be put into doing so, however we are of the view that the £725,000 spent cleaning up flytipping incidents and the monies expended on tracking down and prosecuting individuals would be better spent improving civic amenity sites and expanding the bulky goods collection service. The End of Life Directives make it more likely that people will fly tip, which is not only expensive for local authorities but also detrimental to the visual amenity of the locality, and encourages other flytippers.

Litter continues to be a problem in some areas of Wales. The consultation document does not advance any innovative solutions to the problem, and restricts itself to education and to local authority enforcement and clean ups as the answer to this issue. We suggest that a more dynamic approach is necessary

We welcome the indication that the National Assembly Government is seeking to reduce the time period for removal of abandoned cars to 7 days. This is a measure that the CIEH has been pressing for since 2002. At present Wales is in a worse position than England, and local authorities have to wait an unnecessarily long time before abandoned cars can be removed. The presence of abandoned cars leads to flytipping and degrades the location. We consider this development to be very important.

Whilst we welcome the fact that light pollution from new development is to be addressed in planning guidance and the Clean Neighbourhoods Act has included light pollution as a statutory nuisance the general issue of the cumulative effect of light pollution has not been adequately addressed. The Clean Neighbourhoods Act will allow local authorities to deal with individual lights, such as security lights, but will not allow for bigger light issues, such as night time lighting of large buildings or shopping centres to be addressed. The levels of light pollution currently experienced in towns and cities is indicative of wasted energy, as noted in the consultation document, but the document does not address this issue, other than obliquely in terms of general energy saving.

QL9: If not, what else needs to be done by government, individuals and other organisations?

It is the view of the CIEH that positive steps should be taken to reduce existing light pollution, both to save energy and in the interests of preserving nocturnal species of animals and insects driven away from towns and cities by light levels.

Funding should be provided to local authorities to allow them to improve and increase the number of civic amenity sites, and bulky waste collections, to reduce the likelihood of fly tipping. There should also be guaranteed funding for organisations and charities that are engaged in the recycling of large objects, such as furniture.

There should be a much more dynamic approach to litter. Local authorities should consider the use of recycling litter bins, such as those used in Wrexham and in the city of Belfast, so that litter can be collected pre-sorted for recycling. Consideration must also be given to dealing with specific types of littering – e.g. littering of streets outside night clubs and fast food premises late at night. Whilst this sort of littering often occurs because of anti social behaviour it is a pollution issue and should be dealt with as such.

Consideration must be given to the issue of tackling existing light pollution. The Clean Neighbourhoods Act allows local authorities to deal with single lights as a statutory nuisance, and planning controls will take on the issue of lights from new developments, however the issue of light pollution arises from the cumulative effect of many lights. It is necessary to reduce the amount of unnecessary light, e.g. lights being left on in retail and office premises over night.

QL10: What would be appropriate indicators of success and how could we measure them?

Indicators of success would be;

1. Reduced fly tipping with a corresponding increase in material deposited at civic amenity sites and with recycling bodies, measurable by weight and by unit items,
2. Increasing numbers of locations moving up the Local Environment Audit and Management System in respect of litter
3. Reduced levels of light from large urban conurbations, measurable in terms of reduction of lumens against black sky.

QL11: How high a priority is this activity (low, medium or high)?

Issues such as litter, dog fouling and abandoned vehicles are matters which engage the public and give rise to large number of complaints. They also contribute to areas looking run down and lead to increased fear of crime. Fly tipping incidents generally lead to further incidents of flytipping, lead to the degradation of localities, and are particularly detrimental to the amenity of open countryside. Light pollution is indicative of wasted energy and also detrimental to nocturnal animal and insect species. For these reasons the priority to be attached to these issues, in all three cases should be high.

QL12: Will the actions described above enable us to deliver our key outcomes for managing flood risk?

Proposed outcomes:

- where appropriate, measures will be in place to manage the risk of flooding from rivers and the sea
- everyone will understand the flood risk they are subject to and how to live with that risk

The CIEH in Wales does not have any expertise in respect of flooding. We therefore do not offer any comments on this issue.

QL13: If not, what else needs to be done by government, individuals and other organisations?

QL14: Do people at risk of flooding have sufficient information about the risk that they face and what they need to do about it?

QL15: What would be appropriate indicators of success and how could we measure them?

QL16: How high a priority is this activity (low, medium or high)?

In the light of the response to QL12 we offer no comments in respect of QL13-16 inclusive.

QL17: Will the actions described above enable us to deliver our key outcome in relation to air pollution?

Proposed outcome:

• **everyone in Wales will enjoy clean air.**

The issue of clean air is very important. The CIEH acknowledges that the plans proposed in this document will contribute to reducing air borne pollutants, and we welcome this. We also acknowledge the very good work undertaken by the Welsh Air Quality Forum, and commend it.

We are concerned however that which the role of road traffic in generating air pollution is acknowledged in the consultation document that not enough is being done to drive transport of goods off the roads. In our view much greater use should be made of the rail and waterways network. It is accepted that 4 pilot projects are being undertaken, but this is not enough to make a meaningful difference.

Although local authorities can impose penalties under the Road Traffic (Vehicle Emissions) (Fixed Penalty) (Wales) Regulations 2003 this is a case of closing the stable door once the horse has bolted, as the vehicles concerned may have been creating excessive emission for long periods before being detected. Whilst supporting the mechanism we are concerned that it should be seen for what it is, a specific enforcement power which will be used at the discretion of local authorities as resources allow, rather than as a meaningful control mechanism. Similarly the emission test attached to MOT tests for vehicles is only a snap shot of the vehicle on one day, and reliance should not be placed on it as a major pollution control mechanism.

QL18: If not, what else needs to be done by government, individuals and other organisations?

We suggest that there should be incentives to changing the way goods are delivered, if not for all of their journeys then at least for part of them. This is particularly important where heavy traffic goes through towns, and in places such as Neath Port Talbot where the main arterial route is close to large centres of population.

We also suggest that more work should be done to eliminate motor vehicles from the centres of towns. Vehicle discharge is usually at pushchair and small child level, and it highest when vehicles are travelling at low speeds or are starting up from cold. We suggest that consideration should be given to further pedestrianisation of shopping centres and where possible to the routing of traffic away from schools gates and other areas where people congregate. We refer to our comments regarding park and drive car share provision made earlier in this response as a mechanism for removing vehicles from town and city centres. We also refer to our comments regarding the continuing upgrading of public transport and the need for an integrated transport regime.

Campaigns to encourage use of public transport in preference to private vehicles must continue, and incentives such as that promoted by Newport City Council giving on year free public transport in return for the crushing of private vehicles should be encouraged.

QL19: What would be appropriate indicators of success and how could we measure them?

Appropriate indicators of success are falling levels of air borne pollutants, measured as presently. They are also reduced reliance on private vehicles and increases in the amount of freight being moved other than by road.

Further indicators could include reduction in the number of people presenting at GPs and at hospitals with respiratory complaints such as asthma which have a direct link to air borne pollutants, although it is accepted that such indicators may be too complicated to measure, due to the number of other contributing factors associated with them.

QL20: How high a priority is this activity (low, medium or high)?

High. Air borne pollutants cause respiratory illnesses, become dissolved in water courses causing pollution of the water and of the sediment and also cause damage and degradation to buildings and to plant and tree life. This issue must be addressed as one of high priority.

QL21: Will the actions described above enable us to deliver our key outcome in relation to noise pollution?

Proposed outcome:

- **there will be an increase in the proportion of tranquil areas and noise pollution will be reduced**

Subject to appropriate implementation, yes. CIEH however notes that increasing the number of bypasses around towns, whilst reducing noise pollution and also the air pollution associated with high volumes of traffic will also have the effect of taking land currently not under development. We urge that Environmental Impact Assessment should be carried out in all cases where this action is proposed to ensure that the best fit solution is adopted.

QL22: If not, what else needs to be done by government, individuals and other organisations?

No comment

QL23: What would be appropriate indicators of success and how could we measure them?

A reduction in the level of background noise, measure and compared to levels pre-intervention.

QL24: How high a priority is this activity (low, medium, high)?

Medium. The experience of CIEH is that neighbourhood noise is considered far more intrusive than background noise levels, which, so long as they are constant are not so intrusive. We therefore suggest that this issue is given medium priority.

QL25: Will the actions described above enable us to deliver our key outcomes in relation to chemicals?

Proposed outcome:

- **there will be greater understanding of the health risks posed by chemicals and these risks will be minimised as far as possible**

Although the consultation document talks about reducing the risks posed by chemicals it is not clear who is intended to have better understanding of these risks. It is critical that the risks are understood by scientists, public health specialists and by legislators, but there is no mention of making the public aware of the risks. Where there is a risk posed by a chemical used for legitimate purpose the public must be made aware of that risk, so that they can choose to avoid taking the risk should they desire to do so.

So far as reduction of risk from chemicals is concerned in our view the measures proposed should be effective.

QL26: If not, what else needs to be done by government, individuals and other organisations?

There must be a respected and authoritative mechanism for advising the public of risks, in such a manner to as not to generate unwarranted levels of fear and concern, but in such a way as to allow for selective avoidance if desired.

QL27: What would be appropriate indicators of success and how could we measure them?

Reductions in the use of chemicals posing hazards to health in manufacturing and processing.

Reduction in the levels of chemicals being detected in rivers, marine and river life and in soils. Reduction in the levels of chemicals being detected in human studies, all measurable in accordance with current practice.

QL28: How do we balance the need for innovation in product developments with the need to protect the public and environment against the potentially adverse consequences of exposure to chemicals?

The mechanism of Integrated Impact Assessment should be used in all cases, and further, the precautionary principle must apply to the development of products which use chemicals which are in any way detrimental to the environment or to human health.

QL29: How high a priority is this activity (low, medium or high)?

High. Mistakes in this area may be damaging to human health and the environment over generations and we must take every possible precaution to prevent this.

QL30: Will the actions described above enable us to deliver our key outcome in relation to radioactivity?

Proposed outcome:

- **appropriate measures will be in place to protect those at risk from radon. Other radioactive discharges in Wales will be minimised.**

Subject to the measures being proposed being effective, and subject to the restrictions on sheep contaminated by caesium being preventing from entering the food chain, yes.

QL31: If not, what else needs to be done by government, individuals and other organisations?

No comment

QL32: What would be appropriate indicators of success and how could we measure them?

Reduction in levels of exposure to radon in homes, measured as currently.

QL33: How high a priority is this activity (low, medium, high)?

High.

Chapter 8 Making the Connections

MTC1: Will the actions described throughout this section enable us to deliver our key outcomes for education and information, policy integration and better delivery by relevant organisations?

Proposed outcomes:

- **individuals take responsibility for their environmental impact and understand what they can do make improvements by recycling, energy saving, reducing car emissions**

- **environmental considerations are integrated in all policy development and that high quality and consistent environmental data is available to inform the decision making processes**
- **the roles and responsibilities of organisations are understood leading to better integration for the delivery of environmental protection and enhancement**
- **good quality information is available at the point where people make decisions and changes in behaviours that have a negative impact on the environment is apparent**

A qualified yes. CIEH endorses the policy of ensuring all sectors of society in Wales are working together for the common goal of improving our environment, but points out that there must be corporate leadership in this regard. If individuals are to be encouraged to change their behaviour they must see that all other sectors, such as industry and commerce are similarly taking steps to make change. The actions to be taken to improve the environment must be seen as an agenda for all, rather than the actions of a fringe minority of enthusiastic amateurs.

It must also be made easy for changes to be made, by provision of facilities that allow change to be made without inconvenience. Integrated transport systems, better facilities for recycling and better access to the coast and countryside are examples of facilitation mechanisms that will make changing behaviour patterns painless.

The risks of failing to act must also be made clear. The recent events in the southern USA have brought home to the American public that the climate is changing. We cannot rely on catastrophic events to cement belief in the need for change. Clear and unequivocal information about the need for behaviour change must be promulgated by all levels of government, and all levels of government must demonstrate through their own behaviour leadership in this regard.

There is also a need for the planning process to be linked. National and local government produces large numbers of strategies and plans covering all areas of their operations. There must be a clear link between these plans to ensure that actions proposed under one plan do not undermine actions proposed under others. Integrated Impact Assessment is vital to ensure that any detrimental impact flowing from a proposal are minimized or ameliorated.

MTC2: If not, what else needs to be done by government, individuals and other organisations?

See answer to MTC1 above.

MTC3: How should the State of the Environment Report be structured in future, what should it report on and how frequently should it be updated?

It is suggested that the report in future should be as supplement to this report, and should contain the indicators chosen and action achieved against the indicators. Reporting on the action achieved against the indicator is essential, but should not require such amounts of work as to divert attention from primary action. Biannual reporting it is suggested is sufficient to note changes and to ensure resources are targeted at areas of greatest need, with a composite report with comment being made on a less frequent basis, perhaps every 10 years.

Where new environmental issues are identified there should be consultation on them, to derive indicators for inclusion within the environmental indicator suite.

MTC4: How high a priority is this activity (low, medium, or high)?

High, the gaps identified in our response to MTC1 should be addressed as an imperative.