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Resources**
Wales

Mr. Geoff Marquis
Environmental Manager,
Neath Port Talbot CBC
The Quays
Brunel Way
Briton Ferry
Neath
SA11 2GG

Our ref: SH/2013/115442/01-L01
Your ref: Airwise Strategy

Date: 20 August 2013

Annwyl/Dear Mr. Marquis

Re; Consultation - Airwise Strategy for Neath Port Talbot Council.

Thank you for consulting us on the revised draft Neath Port Talbot Council "Airwise – Clean Air for Everyone Strategy" and please find below our comments which we hope will be useful in your authority formulating the final document.

Please note that on 1 April 2013, Natural Resources Wales brought together the work of the Countryside Council for Wales, Environment Agency Wales and Forestry Commission Wales, as well as some functions of Welsh Government. Our purpose is to ensure that the natural resources of Wales are sustainably maintained, used and enhanced, now and in the future.

Introduction.

We have actively participated and worked with your authority (and other public bodies) to improve the air quality within the Borough and in particular the Port Talbot area. The combined efforts of all the partners are gradually improving the quality for the benefit of local residents and visitors alike. We appreciate the vital importance of the "Airwise strategy" in terms of air quality and rest assured Natural Resources Wales share your authority's concerns regarding this important and integral element in the overall policy of improving the quality of the life for the population.

Introduction to comments.

In an effort to assist you in this matter we will present our specific comments in chronological order as they appear in the draft "Airwise strategy" document. The points will include a text reference point to aid the reader in locating and assessing our comments.

We also offer some general comments below and finally some overall comments as to the efficiency of the document.

General comments.

We have several general comments;

- On the structure of the document, in addition to page numbers, the use of paragraph numbers throughout the document would have been advantageous for the reader.
- Additionally the paper continually refers to Environment Agency Wales and this should now read Natural Resources Wales both in text and tables.
- Clarification of various symbols throughout text i.e. should be CO_2 : mg/m^3

Specific Comments.

1. Opening Para – Executive summary.

There appears to be a conflict in publication date for Airwise publication, it states February 2000 yet date is stated as 2002 in Para 1.2.

2. Second Para refers to “Modern Industry”.

We consider that this situation is linked to all Industry and as such this should just state “Industry” in the text.

3. Our vision is.... 1. PM_{10} in Port Talbot.

Should this year read 2012?

4. Issues of local concern. Page 4.

Port Talbot area. PM_{10} – fine particles less than 10 microns in diameter. These arise mainly from Industry; *traffic* and from....

5. Page 4. – last Para on page;

Should this read; *average = 40 ug³*.

6. Page 5. – $\text{PM}_{2.5}$ Para.

Duplication of phrases. Should read “*The source of $\text{PM}_{2.5}$ includes trans-boundary sources as Saharan sand and European Industry which may have travelled many thousands...*”

7. Page 6. Ozone (O_3) Para.

Duplication of phrase in same paragraph; “*It irritates the airways of the lungs...& irritating the airways.*”

8. Page 6. Ozone (O_3).

Spelling error - last but one sentence; should read “*no more than ten exceedences*”.

9. Page 7. Figure 4 Polyaromatic Hydrocarbon levels in Port Talbot.

We consider it would be beneficial to the reader if the figure included EU Target value in graph and clear labeling/notation of the other lines indicated in the figure.

10. Page 8. Second paragraph.

Spelling error – diltusion should read *diffusion*.

11. Page 8. Figure 7. Nickel monitoring stations in Pontardawe.

The locations in the figure are shown in red NOT green.

12. Page 9. First paragraph.

The paragraph states that “, Levels of nickel at this site have decreased substantially.....*are hoped* to meet new European targets introduced in 2013”. Should the strategy be more positive in language and tone than just saying “are hoped”? Would not the words “anticipated or expected “instill greater confidence in this statement.

13. Page 8. Figure 8 Nickel levels at Tawe Terrace.

We consider it would be beneficial to the reader if the relevant target values and labeling were added to graph.

14. Page 10. First and second paragraphs,
Should mg/m^2 read mg/m^3 .

15. Page 10. Third paragraph.

Should this sentence read; “All these sites are in close proximity to an industrialised area *and a major construction project (PDR)*”.

16. Page 10. Fourth paragraph.

There is reference here to Ochwr y Waun, Cwmllynfell opencast exceeding the $80 \text{ mg}/\text{m}^3$ per day – are there any actions being undertaken to resolve position?

17. Page 11. Para. 4.2 1. PM_{10} in Port Talbot. Second paragraph.

This paragraph gives a sweeping comment which is open to question. We recommend an alternative statement; “ Levels of PM_{10} and exceedences are continuing to gradually decrease below the EU objectives but we will continue strive to seek even greater improvements in the local air quality”.

18. Page 12. Second paragraph.

Should this paragraph read; Pollution was carried up and down the valley until a task group set about modelling and which instigated investment by the owners of the Mond (now Vale) works allowing it to operate within EU targets.

19. Page 12. Fourth paragraph.

We question the validity of the statement that “nickel levels continue to fall towards EU targets” as there may have been a spike in levels in 2013?

20. Page 12. Sixth paragraph.

Final sentence should read; “Again... around nickel companies within the Neath Valley”.

21. Page 15. First paragraph.

Typo error. “The Council will continue to carry out it’s” should read; “*its*”.

22. Page 15. Air Quality Action Plan (AQAP).

Planning policies – Unitary Development plan and forthcoming Local Development Plan.

We have been actively discussing with your authority’s Planning department this particular issue and exploring potential policy framework to affect PM_{10} within Port

Talbot. We await the opportunity to comment upon the air quality issues/policies in the Deposit Local Development Plan which is due for publication due in late August.

23. Page 15. Air Quality Action Plan. (AQAP).

Company name change – Civil and Marine Slag Cement – now called Hanson Cement.

24. Page 18. EAW (NRW) & NPTCBC regulation.

Should this read "*Both EA (NRW) & NPTCBC regulate these businesses using permits and NPTCBC is working to improve operations at Wall Colmonoy moving them towards achieving BAT*".

25. Page 18. EAW (NRW) & NPTCBC regulation.

There is a statement in the text which says "to be reviewed by European Commission by 2013". However there is no clarification of what is to be reviewed.

Overall comments.

1. There is a long history of collaboration and liaison between your authority and us (both former EAW & NRW) in the area of air quality. This positive relationship transcends to other environmental activities and has been paramount in the area of Town Planning with particular reference to the Neath Port Talbot Local Development Plan. It is with this sense of common purpose for improving the environment that we have presented the aforementioned comments which we hope will be of assistance and allow clarification of the Airwise Strategy for Neath Port Talbot.

2. We note that one of the stated aims of the strategy is "To ensure air quality throughout the County Borough is better than the standards required by EU and UK legislation" which is a very progressive and ambitious goal. Is this setting the bar too high? Would not a staged progression linked to timescales be more prudent?

3. Consequently this leads us to one of the key elements which appears to be missing from the strategy i.e. that of timeline/timescales for the life of the Strategy. Questions which seem relevant at this juncture are;

- What is period of time that this Strategy is looking at?
- When will be reviewed again?
- Is it envisaged that the Strategy timescale will run parallel to that of the Local Development Plan? Or some other plan such as advocated by Local Service Board?

4. Finally thank you for consulting us on the "Airwise; Clean Air for everyone" publication and we welcome this valuable opportunity to contribute to future policy and guidance. Naturally we are happy to meet and discuss our comments regarding the document if required and sincerely hope our excellent working relationship continues to assist in improving the air quality of Neath Port Talbot

 Yn ddiffuant / Yours sincerely

Mr. David Watkins
Technical Specialist

Direct dial 01792 325 533

Direct e-mail david.watkins@naturalresourceswales.gov.uk

