

Keep Wales Tidy: Response to Welsh Government proposed '[White Paper on a clean Air \(Wales\) Bill](#)' January – April 2021

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Keep Wales Tidy is an independent environmental charity working across Wales to improve our environment for the benefits of people and wildlife alike. We have decades of experience in working with communities on Local Environment Quality (LEQ) issues and work in partnership with local authorities, businesses, schools, NGO's and other stakeholders to achieve our vision of a beautiful Wales that is cared for and that can be enjoyed by everyone.

This consultation response is informed by our work with local partnerships and communities across Wales, many years of collected data and our expertise in the field of environmental behaviour change and campaigns.

We welcome the opportunity to respond to this consultation and broadly support this White Paper and proposals. We particularly welcome the recognition of the severity of risk posed to human health and the recognition of the broad range of negative impacts that pollution has on wildlife and ecosystems (although the latter argument could be strengthened).

Keep Wales Tidy believes that this is an appropriate time to revise relevant Air Quality legislation and regulations and establish a framework and targets which meets World Health Organisation (WHO) guidelines and hope that this is still the case when the revised guidance is released (currently pending).

Due to the extensive and far-reaching impacts of this issue which the WHO cites as being 'the biggest environmental threat to human health', we believe that the severity of the issue warrants the implementation of legally binding reduction targets for all major pollutants including nitrogen oxides and ammonia which have the highest cumulative impacts on both human and environmental health.

Although links between the Environment Act and Wellbeing of Future Generations (Wales) Act have been made throughout, Keep Wales Tidy would also urge explicit recognition of the links between air pollutants and climate change as many are direct contributors. Establishing this link at the outset would also support framing awareness efforts at certain target audiences more effectively.

Given that 'deprivation acts as an amplifier for the negative effects on health of air pollution'¹ we would urge that the proposals in this paper do not have unfair impacts on those with low incomes, especially key workers whose travel requirements tend to be different from traditional 'in – out'

¹ Clean Air Advisory Panel, December 2020 'Impacts of the Covid-19 pandemic on air quality in Wales: March to October 2020' Available: <https://airquality.gov.wales/reports-seminars/reports> (Accessed: 18/2/21)

commuters and for whom, newer cars or the alternative option of public transport would be least viable.

It is positive to see that the main thrust of the White Paper is towards prevention, however one of the key gaps that we have identified is around education and awareness. Keep Wales Tidy believes that there is a significant lack of awareness and understanding of this issue and some of these proposals would suggest at least a minimum level of knowledge in the public mind.

Keep Wales Tidy specialises in promoting environmental behaviours and works in partnership with local authorities, behavioural psychologists and other stakeholders to inform, research and promote understanding of what actually works. We have collated research from a number of behavioural studies on both adoption and policy interventions in the [appendix](#) to support this response. As such, the suggestions within this response are based on academic studies of behavioural change for air quality interventions.

A good example of how behavioural interventions need to be considered more for this issue is the recently introduced reduced speed section on the A470 near Pontypridd where the signs frequently read 'Air pollution kills' without making the link between speed reduction and decreased air pollution. This is by no means a criticism of the intervention, but only to suggest that higher speeds and increased pollution is not a commonly perceived link and the signs do not necessarily support drivers in making that link. A better message could read, for example: 'higher speeds = higher pollution' or 'reduce the speed, reduce the pollution' as we know that understanding air quality issues has a direct correlation with adoption of air quality initiatives.

Keep Wales Tidy also welcomes the recent report on the impacts of the **Covid pandemic on Air Quality in Wales (March -October 2020) from the Clean Air Advisory Panel**. Their findings have supported our response to this consultation and we would support extending the review to consider any findings to ensure that this piece of work is reflective of the most recent evidence base.

1: Our strategic approach to improving air quality and supporting a healthier Wales. Clean Air Plan for Wales: Healthy Air, Healthy Wales

Q1. Do you agree with the proposal to create a requirement within the Bill for a Welsh Clean Air Plan or Strategy to be reviewed and published at least every 5 years? If not, please provide details

Q2. Do you agree with the proposed timescales for the review of the Clean Air Plan or Strategy? If not, please provide detail.

Q3. Do you agree Welsh Government should introduce a framework to set new air quality targets?

Q4. Do you agree with the proposed air quality target setting framework? If not, please provide evidence to support your answer, if available

In regard to the strategic approach and target setting, Keep Wales Tidy believe that the overall approach to this is positive. We also support the intention to exceed EU targets and to meet and /or exceed the stronger WHO Guidelines (expected revision 2021). However, the proposal could be **strengthened in terms of vision and commitment by ensuring that targets for reducing major pollutants are legally binding**. This includes nitrogen oxides and more specifically ammonia (NO₃).

Binding targets would serve as a catalyst for action, in the same way that statutory recycling targets propelled us to achieve world-ranking recycling rates, **Keep Wales Tidy believes that binding targets**

on major pollutants will have a similar effect and will kickstart progress where voluntary efforts have been unsuccessful.

Over half of Wales' total land area receives ammonia concentrations above the critical level set to protect lichens, mosses, liverworts and similar plants – keystone species that are vital to ecosystems.² This is having a knock-on effect on species of pollinators, fungi and other plant life.

Although recognised that ammonia is part of the proposed PM2.5 targets, Keep Wales Tidy would urge this pollutant to be considered specifically due to its increasing prevalence and devastating impacts on human and whole ecosystem health. **While NO_x emissions are declining, ammonia emissions have risen in recent years.** Farming is by far the main source of ammonia emissions – 91% in 2017 – but only an estimated 5% of farm emissions are directly regulated.³

This issue is also highlighted in the report by the Clean Air Advisory panel: *'Initial work submitted by the UK Centre for Ecology and Hydrology to AQEG 2 suggests that, for the UK, urban background¹⁰ and urban on road and roadside emissions of ammonia are likely to have decreased by as much as 30% and 90% respectively compared with normal emissions before COVID-19. However, **the total ammonia emissions are likely to have decreased by only around 2% due to the dominance of agricultural emissions.**'*⁴

Voluntary action by the farming sector has not been successful in recent years and **statutory interventions are needed** for change to occur. This could be integrated with the Control of Agricultural Pollution Regulations 2021.

Strategic links should also be made with **policy action on Climate Change and the Decarbonisation** agenda, this would not only serve to recognise the contribution of many major pollutants as direct contributors to global warming but would also expand the potential for targeting awareness for future resources and campaigns. These links across would also facilitate regular reviews as **air pollution levels can be used as a key indicator for Government across a spectrum of policy areas.**

Keep Wales Tidy supports the proposed review of the Plan every 5 years although would urge that some elements (such as nitrogen and ammonia levels) may benefit from more regular scrutiny, particularly in the first term of the plan. Again, communicating progress can also be a key tool for raising awareness and understanding.

Chapter 2: A fit for purpose legislative framework

Q5. Do you agree there is a need to clarify and strengthen legislation? If so, do you agree with the approach outlined?

Q6. Do you think a mutually agreed compliance date on a case by case basis will help to achieve air quality improvements in AQMAs, in the soonest possible time? Please provide detail.

Q7. How can we ensure the 'partners' concept improves and supports collaboration in improving air quality?

Q8. Will these proposals collectively help to deliver a more proactive and prevention focused LAQM regime?

² <https://www.theguardian.com/environment/2019/jun/18/ammonia-pollution-damaging-uk-land-report>

³ Hawley, J. Plantlife, 2021, 'Clean Air for Wales' Wildlife', 2021, WEL Species Champions newsletter spring 2021

⁴ Clean Air Advisory Panel, December 2020 'Impacts of the Covid-19 pandemic on air quality in Wales: March to October 2020' Available: <https://airquality.gov.wales/reports-seminars/reports> (Accessed: 18/2/21)

Keep Wales Tidy supports the approach to strengthening current legislation and regulations. We would agree that **the approach takes a more proactive and preventative approach generally towards tackling AQMA's and LAQM although we note some areas which need further strengthening** or clarification.

In regard to the 'partners' concept, we would agree generally that collaboration is key to supporting efforts to improve air quality. However, we would note that there is already a requirement for collaboration in the Wellbeing of Future Generations (Wales) Act (WFG) with a reduction in NO2 emissions being a key national indicator. This being the case, there is clearly more that needs to be done to foster and incentivise collaboration on this issue. Again, ensuring that the targets are legally binding would be a catalyst for this concept and for successful action.

We would urge in the first instance that key delivery partners are identified as part of local plans and would ask that Welsh Government consider what resources might be required to enhance partnership working. We would also underline the **importance of partnership advice and external input into planning permissions** with the recent judicial review of the poultry farm in Powys being a relevant and recent case in point.⁵

The eNGO sector could support this agenda quite significantly, for instance; environmental improvements and green infrastructure, data gathering and monitoring, local active travel planning and route maintenance, awareness campaigns and communications, advice for planners and expertise on impacts.

Currently however, it is a rare exception that eNGO's have been invited to join discussions on this issue as it is largely considered to be more in the realms of public health or transport and infrastructure. This is reflected in the types of funding available to the third sector to tackle this issue as well and will be a key factor in shaping what form partnerships could take.

We would also like to highlight the potential **collaboration across the border with English Authorities**, most obviously where there is a shared land border but also in the case of the Severn Estuary authorities and where shared air and water pollution is a common link along roadways, rivers and other spatial pathways. From our experience with local authorities, we understand that this type of collaboration is rare, with the exception of Flintshire where collaboration along the Dee river for clean-ups and community activities are increasingly common. The issue of the border is an important aspect in partnership working as many key employment hubs are situated in those border authorities and therefore often attract increased congestion.

Q9. Do you think the proposals would support the efficient and effective roll-out of Clean Air Zones / Low Emission Zones in Wales?

Keep Wales Tidy is supportive of the concept of Low-Emission Zones and charging with some key caveats. Namely that their introduction must be combined with:

- ***Efforts to ensure that public transport and active travel which reflects the needs of the local population are efficient, available and affordable.***
- ***The charge is ring-fenced for air quality or active travel promotion purposes and that there is complete transparency around the charge to ensure that it is not viewed as 'yet another tax'.***

⁵ <https://www.theguardian.com/environment/2021/jan/30/welsh-council-admits-it-should-not-have-approved-vast-poultry-farm>

- ***That low-income households and key workers such as those working in private care and on low-incomes are not unfairly targeted or that they qualify for some sort of exception / reduction.***

Efforts to ensure that public transport and active travel which reflects the needs of the local population are efficient, available and affordable.

In order to promote alternatives to private car use, it is critical that **other alternatives are available and that they suit the requirements of the population**. This is an especially important element in the post-Covid world where working commutes and structures have changed significantly. The requirements of the local population may no longer be in and out of town routes but less direct 'across' routes. Before any financial deterrent is imposed, **it is critical that transport and all associated infrastructure is accessible, convenient, affordable and safe**. For example - A UK Department for Transport study **60% of women are scared waiting on train platforms**, 49% are scared waiting at the bus stop, and 59% are scared walking home from a bus stop or station. (The figures for men are 25% , 20 % and 25%, respectively).⁶

The charge is ring-fenced for air quality or active travel promotion purposes and that there is complete transparency around the charge to ensure that it is not viewed as 'yet another tax'

Like many environmental levies, the primary aim of the LEZ charge is to change behaviour, rather than to raise revenue. The charge should be utilised as an awareness raising tool and should be ring-fenced for the promotion of local travel and or environmental improvements that mitigate air pollution. For it to be received positively however, it must be communicated well and it must not be seen as 'another tax'.

That low-income households and key workers such as those working in private care and on low-incomes are not unfairly targeted or that they qualify for some sort of exception / reduction.

It is clear that older cars, particularly older diesel cars, are the target of LEZ interventions as they are the most polluting. However, we should also be aware that there are **many people in Wales who cannot afford to buy a new car (or even a newer car) and that many low-income key worker jobs may require more frequent travel** such as those who work shifts or those who work in private care who need to undertake numerous home visits – these would also be **the same potential group of people for whom public transport is not a viable option, either through cost, convenience, access or safety** as above. There are a number of ways to address this issue, from introducing exceptions, special worker permits, requiring organisations to ensure leased fleets are LEZ compliant or by introducing an affordable and interest free financial mechanism for those on low-incomes to purchase newer vehicles.

Q10. Do you believe revenue raised through trunk road charges should be available for purposes other than to support local transport policies (please specify)?

Keep Wales Tidy **supports the proposal and general concept for Road Charging**. However, we would suggest that local transport policies is too broad a term to be useful here and would not want it to get lost. That said, we do support road charges only being available for specific purposes. We would suggest the following activities would be suitable:

- **Developing and maintaining Active Travel Routes (including safe routes to schools)**

⁶ Badtsuber, N, October 2019, <https://www.londonreconnections.com/2019/mind-the-gender-gap-the-hidden-data-gap-in-transport/> (Visited: 11/2/21).

- Upgrading local travel routes and infrastructure (see Q9 above) and ensuring safe infrastructure
- Strategic green infrastructure projects that mitigate Air Pollution (see [Appendix 2](#))
- Air Quality Awareness campaigns / resources
- Conversion / Electrification of public transport
- (Fast) Electric charging point network development

Wherever possible, it would be very beneficial for the activities that the fund goes towards to be visible and for a direct link between the charge and the activity to be made through public communication – this would be a key element in increasing support for the charge.

Q11. Do you agree with the proposals relating to tackling engine idling?

Q12. What do you think are the advantages/disadvantages of the proposals?

We largely agree with the proposal to increase the fines and capability for enforcing against engine idling. However we would suggest that this is not the most appropriate or preventative approach in the first instance. The primary reason behind this is that there is still a very significant lack of understanding and awareness of air pollution and the associated risks. Enforcement is rarely a useful tool on it's own and it is essential that this is accompanied with education and engagement.

There is also the danger – as noted above with LEZ zones – that those on a low-income will be heavily targeted by this approach as newer vehicles are often equipped with **start -stop technology**. Indeed, the proposals explicitly say that they will target older vehicles. **Targeting those without money does little to promote positive behaviour change but can also increase the financial burdens on local authorities who then need to chase up the payments.**

Keep Wales Tidy does however, **strongly support efforts to reduce idling** and to raise awareness of the issue and does not disagree that FPN's could play a role in this in some cases although cannot be carried out in isolation without education and engagement measures.

Q13. Can you suggest any additional approaches to tackle engine idling?

Q14. Do you have any evidence to present on the links between emissions and exposure in respect of idling?

Idling is a behaviour which is best addressed through behavioural interventions. Keep Wales Tidy will be running an air quality trial with Cardiff University as part of the Caru Cymru programme. Further details will be submitted separately to this response to relevant officials in Welsh Government.

There are few barriers to engaging with all schools in Wales to adopt 'No Idling' Zones and children and parents can be engaged as a way of raising awareness as to *why* vehicles should be switched off. Keep Wales Tidy's Eco-Schools programme could support this effort.

Planning is also an essential part of changing behaviour and ensuring safer routes to schools. Whilst interventions at the school gate to stop idling engines and raise awareness can be effective, behaviour change will not occur unless the area or environment enables safe access and is designed in such a way as to be the better and more convenient option.

A community-based approach could be designed in certain areas to address specific behaviours such as idling cars in traffic or outside schools. Over a two-week period, 50 volunteers from the behaviour change charity Global Action Programme, directly approached idling drivers in London to inform and

spread the word about the dangers of air pollution and the effect of idling on pollution levels. Drivers were asked to switch off their engines and rewarded with a thank you air freshener to hang in their vehicle to remind them of the no idling behaviour. Although it was impossible to review the campaign in terms of longitudinal behaviour change or reduction in emissions, it embodied some of the key principles of a simple message, delivered face to face, a quick reward and long-term prompt.

Q15. Do you agree with the proposal to transpose Part 3 of the Clean Air Act 1993 (Smoke Control) into Welsh legislation?

Keep Wales Tidy supports this proposal in principle but would urge caution for enforcement measures over awareness raising measures for reasons laid out elsewhere in this document. This element also has **a link to fuel poverty and as many areas are still off-grid in Wales (an estimated 17% of households)**, we believe that this section could be approached in a more sophisticated manner.

As with other elements of air quality, we also believe that the **public have very limited understanding of indoor air pollution** generally. This was highlighted in the Clean Advisory Panel report as an area which may have increased over the period of the Covid pandemic and resources that support awareness and behaviour change are required to address this issue.

Q16. Are there any other aspects of the Clean Air Act which you would consider appropriate for inclusion within Welsh legislation?

Q17. Do you agree changing the enforcement regime from criminal to civil action will assist in improving enforcement?

Q18. Would you agree in light of the evidence there should be a presumption in favour of Smoke Control, at a minimum in urban areas?

Q19. Do you agree with the proposals?

We agree with this approach, but statutory guidance should only be in place if the overall targets for air quality are binding. In addition, **workplaces and other listed organisations would have to be supported through practical advice and support in order to take action**. Some examples of this are listed in [Appendix 3](#).

Q20. What are the advantages/disadvantages of the proposals?

Q21. In what other ways or by whom could the guidance be delivered? Please provide detail.

- If resources were made available, Welsh Government could support a network of lay **Air Quality Champions** through schools, councils and businesses to raise awareness and champion the issue of air pollution to a wide network.
- Similarly, we would also support **Air Quality for Health Champions** through **training and advice programmes through GP's and surgery staff** where, for example, air pollution maps could be displayed in waiting rooms and the related health information can be provided.
- **Support for new and existing BID's** to engage with air quality issues and solutions – See case study example in [Appendix 2](#)
- Increased support for **effective monitoring and monitoring capacity** to improve the evidence base.
- Coordination and joint promotion of air quality messages and engagement with environment and health focused NGO's
- Continued promotion and engagement on the impacts through Public health Wales including advice to GP's

- Improve cooperation on trans-boundary pollution with England and Ireland
- Partnership at local and regional levels to target 'hotspots' including health, planning, environment, farming and industry

Q22. What would be best way(s) for stakeholders to report progress to the Welsh Government?

Q23. Do you have any additional points to make?

Keep Wales Tidy believes that the time is right to **ban the release of fireworks due to the pollution they release into the air, the litter they cause on the ground (albeit seasonal) and the danger and distress they pose to animals.**

Fireworks contain two main components – the explosive (gunpowder), which propels it into the sky, and metal salts (different metals produce different colours), which produce the effects. These are enclosed in a paper or plastic shell casing and are attached to a (usually wooden) stick.

Unfortunately, this means that their fallout and litter contain materials which have serious consequences for not only the air, but also soil and water. This is particularly important when we consider that like all litter, fireworks often find their way into watercourses. In Oklahoma, for example, fireworks increased salt levels in one lake up to a factor of 1,000, a level exceeding many states' maximum allowable levels for drinking water, and it took between 20 and 80 days for the levels to return to normal.⁷ Firework byproducts are also linked to acid rain.⁸ In addition, fireworks '*...often contain carcinogenic or hormone-disrupting substances... not to mention the lung-clogging smoke they release...*'⁹

We believe that air quality is the right area in which to introduce a ban (or at least partial ban for private use), making the direct links between fireworks and human health. For more information see Keep Wales Tidy's '[Litter from the Air](#)' paper.

Q24. We would like to know your views on the effects these provisions would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English.

Q25. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

Q26. Please also explain how you believe the proposed provisions could be formulated or changed to have positive or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language

⁷ Newsweek. 2017. Are Fireworks Chemicals Dangerous? Available: <http://www.newsweek.com/are-fireworks-chemicals-dangerous-81679> [13.4.2017]

⁸ Mclendon, R. 2017. Are fireworks bad for the environment? Available: <https://www.mnn.com/earth-matters/translating-unclesam/stories/are-fireworks-bad-for-the-environment> [06.7.2017]

⁹ Mclendon, R. 2017. Are fireworks bad for the environment? Available: <https://www.mnn.com/earth-matters/translating-unclesam/stories/are-fireworks-bad-for-the-environment> [06.7.2017]

Appendices

Appendix 1: Air Quality and Behaviour Change

Keep Wales Tidy specialises in promoting environmental behaviours and works in partnership with local authorities, behavioural psychologists and other stakeholders to inform, research and promote understanding of what actually works.

From various studies in this field, Keep Wales Tidy can share a number of insights into promoting behaviours around air quality. We have focused here on behaviours that affect day to day behaviours such as idling engines, rather than long-term behaviours – such as choosing a car.

Replicated aspects of studies on Air Quality Interventions (AQI) to promote participation and awareness;

-Increasing AQI knowledge is critical for AQI adoption to occur.

-Perceived susceptibility, perceived severity, perceived benefits, perceived barriers, cues to action, and self-efficacy need to be considered with respect to AQI adoption.

-Reasons for not checking and following health messages varied between lower and higher SES groups.

-Demographics (gender, age, education, and area of residence), knowledge/understanding, and individual perceptions (neighbourhood air effects on health) were significant predictors of AQI awareness, checking, following health messages, and adoption.

-Women tend to be less aware than men over risks and health interventions but are significantly more likely to act on health messages.

-Intervention strategies must clearly define the at-risk populations such that they are able to self-identify and understand that they are considered at risk

-Intervention strategies must account for variations in environmental risk perceptions found in lower and higher SES areas as sensory cues prevail over AQI adoption.

In addition, key aspects of a number of Air Quality policies have been studied extensively:

- Rejection of proposals for congestion charging are linked to uncertainties over the impacts of the charge as well as a lack of information to those who will be affected
- Increasing road charges is likely to reduce car use and increase public transport use
- Preferential taxes for lower emission cars results in increased sales and a potential reduction in air pollution
- In some locations, the use of travel plans with individualised information and the request to make a behavioural plan is found to increase public transport use
- The presence of crossing areas increases the likelihood of primary school age boys walking to school and feelings of safety and security increased the likelihood of girls walking to school

- The need to provide information that is relevant and targeted with regard to environmental knowledge may have an impact on behaviour
- Aspects of urban design such as pedestrian and cycle paths that are well connected reduces dependency on private car use
- Those reporting less traffic noise reported actively travelling more frequently

Appendix 2: Victoria BIDS - Strategic Infrastructure for Air Quality Improvement

The Victoria borough in London has been leading the way of implementing green infrastructure within the BID structure and have done considerable work on the application of strategic vegetation for the purpose of enhancing air quality. Launched in 2010, the BID has ten employees, has a catchment of more than 250 businesses and has an annual revenue of approximately £1.4 million. 'Clean and Green' is one of 5 thematic groups which the BID has developed and the revenue is roughly equal to each group. Victoria is the 6th biggest entry point to the UK and has two major transport hubs making the area vulnerable to particularly high levels of pollution. In their first year, the 'Clean and Green' team mapped all of their green space in the BID area, including the potential on roofs and potential tree-planting space. Their mapping exercise is now considered best practice and was used to create a roadmap of green projects to implement over their first five year BID phase. Their projects have included creating low maintenance green space such as the Diamond garden, now looked after by the Palace Guards and the creation of one of London's largest Living Walls covering 450 square metres on the side of the Ruben's Hotel. Other small parks, green 'screens', tree planting and pollinator friendly habitats have been created in the borough and has led to the increasing recognition that green spaces are beneficial to businesses with many taken on small scale 'ownership'.

The BID has undertaken significant monitoring and evaluation of their installations from thermal imaging to gauge the cooling effects of the living wall to attitude and behavioural studies. The evaluation of the first phase of the 'Greener Victoria' BID includes a number of learned lessons and recommendations for this application of green infrastructure in urban areas, particularly when working with businesses.

With their experience of engagement with a variety of public stakeholders, the BID have also produced a 'Little Guide to Better Air Quality' which has informed some of the recommendations in this document.

Website: <http://www.victoriabid.co.uk/>

Appendix 3: Suggested practical tips to promote air quality in the workplace

- Explore private hire vehicle contracts with hybrid and electric cars
- Support investment in workplace electric charging points
- Incorporate air quality, alongside other environmental targets, into supply chain policies
- Embed air quality into corporate responsibility and environment policies
- Launch campaigns internally to promote walking and cycling using air quality as a core driver for change
- Workplace actions around the annual 'Clean Air Day'
- Establishing 'No idling zones outside schools and workplaces
- Engage children in the subject through Eco-Schools projects and creative monitoring methods
- Reduce the number of vehicles delivering to the office
- Share services with neighbours and organisations on different floors for business basics (eg: stationery and toiletries)

- Demand a lower emission vehicle that delivers your goods and services
- Ask drivers to refrain from idling their vehicle engines when visiting site
- Reduce gas consumption and install ultra-low NOx boilers when fitting new or upgrading equipment
- Assess the energy needs of the building to improve efficiency and reduce gas usage
- Install ultra-low NOx boilers or at least a leaner burner
- Parent / public information packs that should include details on minimising air pollution impacts locally to the school
- ULEZ complaint car loan schemes for employees
- Sharing the 'Air quality weather forecast' as part of internal communications