

## Appendix 1 – DAERA consultation on the Draft Air Quality (Amendment) Regulations (Northern Ireland) 2026 to tighten annual average particulate matter (PM<sub>10</sub> and PM<sub>2.5</sub>) limits, targets and objectives in Northern Ireland.

Air and Environmental Quality Branch  
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Via email: [PM.Regulations@daera-ni.gov.uk](mailto:PM.Regulations@daera-ni.gov.uk)

Dear Sir / Madam

**Re: Consultation on the Draft Air Quality (Amendment) Regulations (Northern Ireland) 2026 to tighten annual average particulate matter (PM<sub>10</sub> and PM<sub>2.5</sub>) limits, targets and objectives in Northern Ireland.**

### Consultation questions:

### About you:

1. What is your name Siobhan Toland, Director City Services
2. What is your email address? Tolands@belfastcity.gov.uk
3. What is your home postcode? BT2 8BP
4. Please tell us if you are responding as an individual or on behalf of an organisation. If you are responding on behalf of an organisation, please confirm the name of the organization and you have the authority to respond on behalf of the organisation.

## Organisation – Belfast City Council

5. Please indicate if you are happy for your response to be published.

Yes

6. If you are responding on behalf of an organisation, please indicate if you are content for the name of the organisation to be associated with your response.

Yes - Belfast City Council.

**Proposed new annual average limits, targets and objectives for particulate matter (PM<sub>10</sub> and PM<sub>2.5</sub>).**

**7. To what extent do you agree with the proposed new annual average limit value of 20 µgm<sup>-3</sup> for PM<sub>10</sub>?**

- Strongly agree
- **Agree**
- Neutral
- Disagree
- Strongly disagree

Please share any further views or suggestions you have in relation to this question. (1,500 character limit).

Council notes that DAERA propose to adopt an annual mean limit value of 20 µgm<sup>-3</sup> for PM<sub>10</sub> to be achieved by 1 January 2028; equivalent to interim target 4 of the *WHO global air quality guidelines*. Responsibility for achieving the proposed annual mean limit value will fall to government Departments. The WHO annual mean AQG is 15 µgm<sup>-3</sup> but DAERA have advised that further policy interventions will be required before stricter PM<sub>10</sub> standards are introduced. Council further notes that the 20 µgm<sup>-3</sup> annual mean limit value is half of the current 40 µgm<sup>-3</sup> annual mean limit value.

In considering the proposed 20 µgm<sup>-3</sup> annual mean limit value for PM<sub>10</sub>, Council has referred to Defra background air pollution mapping provided to inform LAQM functions. Defra have clarified that the total concentration of an air pollutant comprises contributions from local emission sources and those transported into an area by wind from further away, adding that if local emission sources are removed, what remains is pollution from further away; *the background*. Referring to Defra background data for 2026, it is noted that background PM<sub>10</sub> concentrations within the BCC area may be up to 14.2 µgm<sup>-3</sup>; more typically 10-11 µgm<sup>-3</sup> in developed areas. Accordingly, in order to achieve the 20 µgm<sup>-3</sup> annual mean limit value, actions will be required by government Departments to address both local and background emission sources, with a likely emphasis on background sources. It is considered, however, that adoption of a 20 µgm<sup>-3</sup> annual mean limit value for PM<sub>10</sub> is a pragmatic initial step towards introduction and achievement of the WHO 15 µgm<sup>-3</sup> annual mean AQG for PM<sub>10</sub>, in view of contributions from local and background emissions sources to overall PM<sub>10</sub> concentrations across the Belfast City Council area.

**8. To what extent do you agree with the proposed new annual average objective of 20 µgm<sup>-3</sup> for PM<sub>10</sub>?**

- Strongly agree
- **Agree**
- Neutral
- Disagree
- Strongly disagree

Please share reason for views or any further views or suggestions you have in relation to this question (1,500 character limit).

Further to our response to question 7, Council notes that DAERA are proposing to establish an annual average objective of  $20 \mu\text{gm}^{-3}$  for  $\text{PM}_{10}$  to be achieved by 1 January 2028; equivalent to interim target 4 of the *2021 WHO global air quality guidelines*. Responsibility for pursuit of this  $\text{PM}_{10}$  annual mean objective will fall to district councils and competent authorities. The WHO  $\text{PM}_{10}$  annual mean AQG is  $15 \mu\text{gm}^{-3}$  but DAERA have advised that further policy interventions will be required before stricter  $\text{PM}_{10}$  standards are introduced. Council notes that the  $20 \mu\text{gm}^{-3}$   $\text{PM}_{10}$  annual mean objective is half of the current  $40 \mu\text{gm}^{-3}$  annual mean objective.

Council would reiterate its comments made in response to Q7 concerning the appreciable contribution from background pollution sources to monitored  $\text{PM}_{10}$  levels in Belfast and as a consequence, Council's, and indeed competent authorities' abilities to mitigate the impact of these distant background sources. In addition, Council would highlight that a detailed assessment for nitrogen dioxide and particulate matter ( $\text{PM}_{2.5}$  and  $\text{PM}_{10}$ ), completed during 2023, indicated that for a 2028 forward projection year, the maximum modelled  $\text{PM}_{10}$  annual mean concentration across the city would be  $20.3 \mu\text{gm}^{-3}$ , at a city centre location, marginally in excess of the proposed  $20 \mu\text{gm}^{-3}$  annual mean objective, and potentially requiring designation of an Air Quality Management Area and associated Action Planning. The Council considers, however, that the adoption of a  $20 \mu\text{gm}^{-3}$  annual mean objective value for  $\text{PM}_{10}$  is a pragmatic initial step towards eventual introduction of the WHO  $15 \mu\text{gm}^{-3}$  annual mean AQG, in view of contributions of local and background emissions sources to overall  $\text{PM}_{10}$  concentrations across the Belfast City Council area.

**9. To what extent do you agree with the proposed new annual average limit value of  $10 \mu\text{gm}^{-3}$  for  $\text{PM}_{2.5}$ ?**

- Strongly agree
- **Agree**
- Neutral
- Disagree
- Strongly disagree

Please share any further views or suggestions you have in relation to this question (1500 character limit).

Belfast City Council acknowledges the significant health disbenefits associated with  $\text{PM}_{2.5}$  and therefore welcomes the proposed tightening of the annual mean limit value to  $10 \mu\text{gm}^{-3}$ . Council notes that responsibility for achieving the annual mean limit value will fall to government Departments. Council further notes that the WHO annual average AQG is  $5 \mu\text{gm}^{-3}$  but that DAERA have highlighted that further policy interventions will be needed before stricter PM standards can be introduced.

Council would again highlight the significant contribution from background emission sources to monitored PM<sub>2.5</sub> concentrations within Belfast. 2026 background PM<sub>2.5</sub> concentrations have been estimated by Defra to be up to 8.6 µgm<sup>-3</sup>; more typically 6-7 µgm<sup>-3</sup> in built up areas; a significant proportion of the proposed 10 µgm<sup>-3</sup> annual mean limit value for PM<sub>2.5</sub>.

Council would additionally highlight that the 2023 detailed air quality assessment indicates that for a forward projection year of 2028, the highest levels of PM<sub>2.5</sub> are predicted to occur where local emission sources coincide with elevated background concentrations. For 2028, the highest annual mean PM<sub>2.5</sub> concentration is predicted to be 13.1 µgm<sup>-3</sup> at a city centre location, and in excess of the proposed 10 µgm<sup>-3</sup> annual average limit value. By way of comparison, the monitored annual mean concentration for PM<sub>2.5</sub> at the Belfast Centre AURN urban background site in 2025 was 8 µgm<sup>-3</sup>.

Accordingly, Council considers that adoption of a 10 µgm<sup>-3</sup> annual mean limit value for PM<sub>2.5</sub> is a pragmatic initial step towards introduction and achievement of the WHO 5 µgm<sup>-3</sup> annual mean AQG, in view of contributions from local and background emissions sources to monitored PM<sub>2.5</sub> concentrations within the Belfast City Council area.

**10. To what extent do you agree with the proposed new annual average target value of 8 µgm<sup>-3</sup> for PM<sub>2.5</sub>?**

- Strongly agree
- **Agree**
- Neutral
- Disagree
- Strongly disagree

Please share any further views or suggestions you have in relation to this question (1500 character limit).

Belfast City Council acknowledges the significant human health disbenefits associated with PM<sub>2.5</sub> and therefore welcomes the proposed tightening of the PM<sub>2.5</sub> annual mean target value. Council notes that DAERA have proposed a new annual mean target value of 8 µgm<sup>-3</sup> for PM<sub>2.5</sub>; a welcome and significant reduction of 17 µgm<sup>-3</sup> from the previous annual mean target value of 25 µgm<sup>-3</sup> and 2 µgm<sup>-3</sup> less than the proposed 10 µgm<sup>-3</sup> annual mean limit value; acknowledging that a '*target value*' is a level fixed with the aim of avoiding, preventing or reducing harmful effects on human health and / or the environment as a whole, to be attained where possible over a given period.

Council notes that the annual mean target value is to be achieved by government Departments.

Council would once again refer to its previous comments concerning the contribution of background sources to concentrations of PM<sub>2.5</sub> across the Belfast City Council area and the impact that such PM<sub>2.5</sub> background sources may consequently have on the ability of

government Departments to achieve the proposed  $8 \mu\text{gm}^{-3}$  annual mean target value within Belfast.

Belfast City Council considers, however, that the various additional policy and mitigation measures that will be necessary in order to achieve the proposed annual mean target value of  $8 \mu\text{gm}^{-3}$  for  $\text{PM}_{2.5}$ , will additionally contribute towards the introduction and facilitate the achievement of the WHO annual mean AQG of  $5 \mu\text{gm}^{-3}$  for  $\text{PM}_{2.5}$ .

**11. To what extent do you agree with the proposed compliance date of 1 January 2028 for these new limit values, target values and objectives for  $\text{PM}_{10}$  and  $\text{PM}_{2.5}$ ?**

- Strongly agree
- Agree
- Neutral
- Disagree
- **Strongly disagree**

Please share any further views or suggestions you have in relation to this question (1500 character limit).

Council notes that the revised annual average objectives are to be achieved each calendar year, with a first compliance year of 2027. To ensure consistency and a lead in time, annual average standards are to have a compliance date of 1 January 2028. Proposed amendments to the existing particulate matter standards are to be made in late 2026.

As the first compliance year is 2027, with a compliance date of 1 January 2028, DAERA are advised that the first formal assessment of 2027 monitoring data will be via the 2028 Progress Report. It is unclear therefore why DAERA have indicated that a compliance date of 1 January 2028 provides an appropriate 'lead in' time. Moreover, the consultation document highlights that administrations that have adopted strengthened  $\text{PM}_{2.5}$  standards have adopted compliance dates of up to 2040.

In setting a  $\text{PM}_{2.5}$  target for England, Defra published evidence reports that included trajectories for various target level scenarios. The trajectories were modelled for emission reduction scenarios and a target baseline to provide a timeline for 2025, 2030, 2040 & 2050, which was then used to inform the likely dates for target achievability. It is unclear if DAERA have undertaken a comparable particulate matter achievability assessment for NI. It is recommended, however, that dates for achieving strengthened NI particulate matter standards should be informed by an equivalently robust scientific trajectory assessment.

Council considers, therefore, that 1 January 2028 is an unrealistic compliance date, in terms of strategies and policies that will need to be developed and mitigation actions that may need to be taken by Departments and councils to achieve, or be in pursuit of new limit values, target values and objectives for  $\text{PM}_{10}$  and  $\text{PM}_{2.5}$ .

## Impact Assessments

### 12. Do you agree or disagree with the conclusions of the Rural Needs Impact Assessment (RNIA)?

- Strongly agree
- Agree
- **Neutral**
- Disagree
- Strongly disagree

Please share any further views or suggestions you have in relation to this question (1500 character limit).

N/A

### 13. Do you agree or disagree with the conclusions of the Equality and Disability screening?

- Strongly agree
- Agree
- **Neutral**
- Disagree
- Strongly disagree

Please share any further views or suggestions you have in relation to this question (1500 character limit).

N/A

## Additional comments

### 14. Do you have any additional comments you wish to raise with regards to the draft Regulations or consultation documents? (1,500 character limit).

- Council notes that DAERA consulted on a NI *Clean Air Strategy* in 2020, but no Strategy has yet been published, despite consultation into tightened PM standards.
- In delivering LAQM functions, AQ officers will refer to LAQM.TG22. Assessment tools provided in TG22 may require revisions to reflect the new PM<sub>10</sub> annual mean objective. TG22 is also utilised by consultants for assessing PM impacts associated with developments.
- Whilst Council recognises the importance of good air quality and associated benefits to health, we are strongly of the view that the legislative framework underpinning the NI LAQM regime urgently requires additional amendments, alongside the introduction of a clear and ambitious policy direction from key government Departments to deliver necessary positive changes. We would reiterate that PM emissions may be transboundary in source and nature.

We would advocate that the NI Assembly considers designating a lead government Department, tasked with ensuring delivery of necessary LAQM functions across Departments, as such Departments are best placed to effect policy changes necessary to reduce PM emissions from transport and combustion sources for existing / new commercial / private premises. Moreover, our strong view is that NI air quality legislation requires introduction of a statutory responsibility on a lead Department, to coordinate development and delivery of AQ Action Plans, alongside development and implementation of achievable regional policy plans to successfully deliver beneficial changes in AQ at a regional level.

- Tightened PM objectives may mean that additional monitoring is required for Belfast. It is unclear if Departments will seek council assistance with monitoring for their limit / target values.