



Department
for Environment
Food & Rural Affairs

Consultation Questions

Before responding to the questions set out in this consultation, we recommend that you read the draft UK overview document, together with the draft plan or plans for the zone(s) you are particularly interested in.

Question 1: Do you consider that the proposed plan set out in the overview document strikes the right balance between national and local roles?

- Yes
- No

If no, please tell us why:

BCC does not agree with the following proposal included in the document:

“The Department will work with local authorities in Northern Ireland to review the Local Air Quality Management regime, so that funding support is shifted away from monitoring and onto specific outcome-based measures which will improve air quality in problem area.”

In order to assist councils with their air quality duties, under Part III of the Environment (Northern Ireland) Order 2002, Article 18 states that the Department may make grants or loans to any body or person for the purposes of:

- carrying out an air quality review or assessment
- preparing and implementing an action plan; and
- the assessment or management of the quality of air.

Historically, the Department provided grant funding to councils at up to a 90% rate for the purchase and maintenance of air quality monitoring equipment, completion of research and for the purchase and maintenance of atmospheric dispersion modelling software. Staff costs were also grant funded at a rate of up to 20p per head of population within the local authority district. It should be noted however, that the Department wrote to councils in March 2015 indicating that the overall budget allocated to air quality management had been cut from £500,000 in 2014 to £100,000 in 2015 and that staff costs would no longer be included.

We are concerned that the LAQM grant money allocated to BCC will not be sufficient for us to maintain and carry out the current legislative duties placed on us. Long term funding within DARD or DRD should be secured on a needs basis and not a general policy position of moving away from monitoring to modelling simply to save money. It is critical that specific outcome-based measures are informed by reliable good

quality monitoring data in relation to both national and local policy decisions. As we have seen, relying solely upon modelling for forward projections is a risky proposition; particularly with regard to road NO_x. We would therefore ask the Department to consider the risk associated with shifting from 'real time monitoring' to modelling.

Question 2: Are you aware of any other action happening in your area which will improve air quality and should be included in the plan? If yes, please identify in the space provided as far as you are able: a. What the additional actions are; b. The zone(s) in which they are being taken; and c. What the impact of those actions might be (quantified impacts would be particularly useful). If there is more than one action please separate them with numbering.

- I am not aware of any other action happening in my area

BCC and relevant partner organisations have just completed a public consultation on a new draft Air Quality Action Plan for the city for the period 2015-2020. The final plan will be available from December 2015 and draws upon all forms of air quality and transport planning activities, including sustainable transport options as well as engineering solutions. It is considered that successful implementation of the measures will improve road vehicle operations and promote and enable a shift onto more sustainable modes of transport to achieve compliance with the nitrogen dioxide EU Limit Value by 2020. This draft plan was made available to Defra and measures from it have feed into the draft UK AQAP. BCC are therefore not aware of any additional measures to improve AQ happening in our area.

Question 3: Within the zone plans there are a number of measures where we are unable to quantify the impact. They are included in the tables of measures. Do you have any evidence for the impact of these types of measures? If yes, please provide the name or code of the zone plan and measure codes of the measure you are referring to in the space provided.

- I do not have any evidence for the impact of these types of measures

BCC and relevant partner organisations have just completed a public consultation on a new draft Air Quality Action Plan for the city for the period 2015-2020. This draft plan was made available to Defra and measures from it to include quantification where possible have feed into the draft UK AQAP. BCC are therefore not able to provide any further quantification evidence in addition to what has already been submitted for the measures proposed.

Question 4: Do you agree that a consistent framework for Clean Air Zones, outlined in section 4.3.6 of the draft UK overview document, is necessary?

Single choice radio buttons (Required)

- Yes
- No
- Not applicable

If yes, do you think the criteria set out are appropriate?

Yes, BCC consider that the criteria set are appropriate.

Question 5: What do you consider to be the barriers that need to be overcome for local authorities to take up the measures set out in section 4 of the UK overview document? How might these be overcome?

- I am not aware of any barriers

Although a duty exists upon Northern Ireland district councils to review and assess air quality, and to develop and manage air quality action plans, responsibility for regional strategic planning, public transport policy and for managing the road network lies with the Department for Regional Development.

Belfast City Council through evidence based monitoring results will continue to seek to influence the Department's policies and proposals, in order to ensure that local air quality issues are afforded due consideration. However, should the DRD not consider it appropriate to take up the measures set out in section 4, we do not have the legislative powers to implement them.

Are there alternative measures which avoid these barriers? If so, please set these out in the space provided.

- I am not aware of any alternative measures

Question 6: Are you aware of any additional action on non-transport sources to improve air quality that should be included in the plan? If so, please set out in the space provided.

- I am not aware of any additional action