



Subject:	DAERA consultation into the 'Clean Air Strategy for Northern Ireland to 2032
Date:	6 th October 2026
Reporting Officer:	Siobhan Toland, Director of City Services
Contact Officer:	Alastair Curran Environmental Protection Manager

Restricted Reports

Is this report restricted?

Yes

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No

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Please indicate the description, as listed in Schedule 6, of the exempt information by virtue of which the council has deemed this report restricted.

Insert number ☐

1. Information relating to any individual
2. Information likely to reveal the identity of an individual
3. Information relating to the financial or business affairs of any particular person (including the council holding that information)
4. Information in connection with any labour relations matter
5. Information in relation to which a claim to legal professional privilege could be maintained
6. Information showing that the council proposes to (a) to give a notice imposing restrictions on a person; or (b) to make an order or direction
7. Information on any action in relation to the prevention, investigation or prosecution of crime

If Yes, when will the report become unrestricted?

After Committee Decision

After Council Decision

Sometime in the future

Never

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Call-in

Is the decision eligible for Call-in?

Yes

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No

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1.0	Purpose of Report/Summary of Main Issues
1.1	The Committee is advised that the Department of Agriculture, Environment and Rural Affairs (DAERA) is presently consulting upon a Clean Air Strategy for Northern Ireland that will run until 2032 - https://www.daera-ni.gov.uk/consultations/clean-air-strategy-northern-ireland-2032 . The Clean Air Strategy for Northern Ireland succeeds the 2007 Air Quality Strategy for England, Scotland, Wales and Northern Ireland and provides for the protection of human health and the environment.
1.2	This report serves to provide an overview of the DAERA Clean Air Strategy as it applies to and modifies the council's statutory Local Air Quality Management (LAQM) functions in respect of the protection of human health, as provided for via Part III of the Environment (Northern Ireland) Order 2002 and the Air Quality Regulations (Northern Ireland) 2003.
1.3	The report serves also to provide recommended responses to a series of questions posed by DAERA as an aspect of the DAERA consultation into the Clean Air Strategy for Northern Ireland to 2032. Proposed responses to the 32 consultation questions posed are provided from Section 3.24 of this report onwards, and at Appendix 1 to this Committee report.
2.0	Recommendation
2.1	The Committee is requested to: • Note the contents of this report concerning the DAERA consultation into the '<i>Clean Air Strategy for Northern Ireland to 2032</i>'. • Agree that the proposed consultation responses, provided at Appendix 1 to this report, be submitted to the DAERA by the consultation deadline of 17:00 hours on 27th October 2026.
2.2	Upon Committee agreement, the consultation response will be provided to DAERA by 27 th October 2026, indicating that the consultation response remains subject to ratification at a meeting of full Council on 2 nd November 2026, and that the consultation response may therefore be subject to amendment.
3.0	Main Report
3.1	The DAERA Clean Air Strategy for NI to 2032 indicates that air pollution is one of the most serious environmental health challenges, and that whilst progress has been made, levels of pollutants such as fine particulate matter (PM _{2.5}), nitrogen dioxide (NO ₂), and ozone (O ₃) still exceed latest World Health Organisation (WHO) guidelines in many areas of NI. The proposed Clean Air Strategy sets out how DAERA, government Departments and partner organisations will work together to reduce these air pollutants, protect health, and create a cleaner environment. For clarity, the Committee is advised that to date, PM _{2.5} and ozone (O ₃) have not been included within the LAQM regime for action by councils, and that as a consequence of the 2007 Strategy and objective concentrations established within the schedule to the Air Quality Regulations (Northern Ireland) 2003 , NI councils have not been working towards 2021 WHO Air Quality Guideline values.
3.2	DAERA have advised that the Clean Air Strategy will serve to provide direction and a framework for action to further improve ambient air quality, which will support better human health, increase public awareness of air quality issues to encourage behavioural change, reduce air pollution and protect the natural environment.
3.3	DAERA have further advised that the Clean Air Strategy will focus upon reducing the main ambient air pollutants that have direct effects on human health, noting that ammonia

	emissions, which arise mainly from agriculture and which can impact both human health and ecosystems, are subject to other policy measures including, for example, the draft Ammonia Strategy for Northern Ireland.
3.4	The overall aim of the Clean Air Strategy is therefore, <i>‘To improve air quality across Northern Ireland by 2032 for the benefit of human health and the environment’</i>. Three goals have been established in pursuit of this aim; namely: 1. To improve air quality to support better human health and prevent ill health and premature deaths associated with air pollution; 2. To reduce air pollution for a cleaner environment; and 3. To increase public awareness of air quality issues and empower the public to take personal action to improve air quality.
3.5	The Strategy includes five Strategic Objectives; 1. Develop our evidence base by building on the existing high quality air quality monitoring network to provide more scientific air quality data, which will help to show if policy changes are working or not. 2. Improve legislation by updating existing legislation to protect Northern Ireland’s air quality and human health. The Committee will recall that DAERA recently concluded a public consultation into the tightening of annual average particulate matter (PM₁₀ and PM_{2.5}) limits, targets and objectives for Northern Ireland. The Committee considered this matter and a proposed council consultation response at agenda item 4c of its 11th August 2026 meeting. 3. Raise awareness and change behaviour by providing people with clear, concise and accurate information to allow people to make better informed decisions and change behaviour. 4. Work towards zero pollution by preventing air pollution at source. If prevention is not fully possible, air pollution should be minimised; and, if air pollution has occurred, it should be remediated. 5. Deliver change through partners by working together to manage and improve Northern Ireland’s air quality. DAERA will work with the District Councils to improve the Local Air Quality Management (LAQM) regime and grant.
3.6	DAERA have advised that the Strategy will have a 6-year duration until 2032, with a midpoint review in 2029, and that at the end of the strategy timescale, a further review will take place. DAERA have further advised that if a new Strategy is not in place to replace the current Strategy, it will remain operational and fulfil requirements of Part III Air Quality of the Environment (Northern Ireland) Order 2002 for DAERA to prepare and publish a strategy containing policies with respect to the assessment or management of air quality.
3.7	In terms of current NI ambient air quality conditions, DAERA have advised that the main air pollutants of concern are particulate matter (PM₁₀, PM_{2.5} & PM_{0.1}), nitrogen oxides (NO_x), ozone (O₃), sulphur dioxide (SO₂), and polycyclic aromatic hydrocarbons (PAHs).
3.8	DAERA have additionally advised that further progress is needed on particulate matter (measured as PM₁₀ and PM_{2.5}), ozone (O₃) and nitrogen dioxide (NO₂) to meet more stringent World Health Organisation (WHO) 2021 guideline values, to reduce the negative impacts or air pollution and to save lives, adding that there is growing concern regarding particulate matter

	pollution and its impact on human health. Moreover, DAERA have highlighted that although ambient monitoring has been expanded within Northern Ireland, ultrafine particles (PM_{0.1}), are not currently monitored and that as an overall consequence, Northern Ireland requires stronger mitigation measures to meet international health-based standards and protect vulnerable communities.
3.9	DAERA have clarified that existing standards, limit values, target values and objectives, for air quality within NI, come primarily from the CAFÉ Directive, The Air Quality Standards Regulations (Northern Ireland) 2010, the National Emissions Ceiling Directive, and the 2007 UK Air Quality Strategy. DAERA refer to the 2021 WHO Air Quality Guideline values but highlight that further change is necessary if we are to comply with these values.
3.10	In terms of the 5 strategic objectives, DAERA have advised that the following actions will be taken to help improve air quality to support better human health, reduce air pollution and increase public awareness of air quality issues.
3.11	Objective 1. Develop our evidence base. • Undertake knowledge surveys. • Review the Northern Ireland air quality monitoring network. • Expand and upgrade the NI air quality monitoring network. • Assess the feasibility of establishing ultra-fine particulate matter monitoring in Northern Ireland. • Develop an Air Quality Model Application.
3.12	Objective 2. Improve legislation. • Consult on new PM_{2.5} and PM₁₀ limit values and make relevant legislative changes. • Review and simplify air quality policy monitoring terms for the public. • DAERA will work with the UK Government to analyse the consultation responses to the 2026 UK wide consultation on solid fuel burning.
3.13	Objective 3. Raise awareness and bring about behavioural change. • Launch Air Quality Awareness and Behaviour Change Campaigns
3.14	Objective 4. Work towards zero pollution. • Achieve a fair and just transition to phasing out of coal, manufactured solid fuels and unseasoned wood for home heating. • Produce Local Draft Transport Plans. • Conduct diesel particulate filter tests.
3.15	Objective 5. Deliver change through partners. • Establish a Northern Ireland Clean Air Forum. • Increase investment in Active Travel. • Deliver a transboundary air pollution collaborative project (PEACEPLUS). • Establish an Air Quality Common Framework. • Improve policy integration between air quality, noise and net zero. • Review the LAQM process and associated guidance. • Review the LAQM Grant.

3.16	In terms of indicators, DAERA advise that '<i>final indicators</i>' will be informed by the public consultation but suggested indicators for particulate matter are a downward (improving) trend in: • PM_{2.5} to 10 µg/m³, assessed as an annual average, in line with WHO Interim Target 4 (from 25 µg/m³ at present); and • PM₁₀ to 20 µg/m³, assessed as an annual average, in line with WHO Interim Target 4 (from 40 µg/m³ at present)
3.17	To measure improvement in feedback, the following indicator is to be used: • 10% increase in average score across all respondents for key questions to the awareness survey.
3.18	Improvement in vehicle emissions will be measured using the following indicator: • A downward (improving) trend in the Wellbeing Framework NO₂ indicator, down to 10 µg/m³.
3.19	With regard to implementation and governance, DAERA have advised that delivery of the Strategy will rely upon interdepartmental collaboration between DAERA, DfE, DfI and DoH, and district council engagement, and that a new Clean Air Forum will operate alongside a cross-Departmental Steering Group to enable partnership working between DAERA, NICS Departments, district councils and non-government organisations.
3.20	DAERA is to lead delivery of the Strategy and the majority of the actions detailed within Annex A (Actions and Delivery Plan) of the Strategy. It is noted, however, that there are to be specific partner obligations upon NI councils in respect of: Strategic Objective 1 – Develop our evidence base. • Review the Northern Ireland air quality monitoring network. • Expand and upgrade the NI air quality monitoring network.
3.21	Strategic Objective 3 - Raise awareness and bring about Behavioural Change. • Launch Air Quality Awareness and Behaviour Change Campaigns.
3.22	Strategic Outcome 5 – Deliver Change through Partners. • Establish a Northern Ireland Clean Air Forum. • Review the LAQM process and associated guidance. • Review the Local Air Quality Management Grant.
3.23	DAERA have advised that government funding for delivery of the Strategy and Delivery Plan will be subject to usual affordability and business case assessments by relevant Departments and that district councils will continue to have an element of funding provided through the LAQM annual grant process.
3.24	In terms of the consultation process, and as advised within paragraph 1.3, DAERA have posed 32 questions for consultees to consider, with questions 1-5 covering consultee details. The council's proposed consultation responses are detailed in Appendix A to this report and are summarised as follows for questions 6 – 32:

3.25	Questions 6 and 7 - Do you agree with the aim of the draft Clean Air Strategy? Whilst we agree with the aim of the draft Clean Air Strategy, we have highlighted that: • The draft Strategy is being consulted upon in late 2026, with an operational period to 2032, and that a new Strategy will therefore have to be agreed within this time period to be available from 2033, alongside implementation of the current Strategy. • The Strategy should have a significantly longer lifetime to provide a continuity of approach to improving air quality, supported by successive Implementation Plans.
3.26	Questions 8 and 9 - Do you agree with the three goals in the draft Clean Air Strategy? We have indicated 'no' and have recommended that: • Goal 2, '<i>To reduce air pollution for a cleaner environment</i>' should be amended to reflect more meaningful and tangible environmental outcomes and / or benefits such as safeguarding the natural environment and / or biodiversity.
3.27	Questions 10 and 11 - Do you agree with the five strategic objectives in the draft Clean Air Strategy? We have indicated that we 'do' agree and have not therefore provided any recommendations concerning alternative or additional Strategic Objectives.
3.28	Questions 12 - Do you believe that the proposed new actions for Strategic Objective 1, will deliver an improved air quality evidence base across Northern Ireland? We have indicated 'no' and have advised that: • We note that DAERA has already commissioned a review of the NI air quality monitoring network to ensure that coverage is in place for legislative compliance; protection of health and the environment; provision of air quality alerts; and the assessment of emissions levels considering 2021 WHO air quality guidelines. • Whilst additional monitoring at locations of relevant public exposure is welcomed, the Strategy does not seemingly consider that, when combined with atmospheric dispersion modelling, compliance with air quality objectives may be assessed across a much wider geographical extent than through monitoring alone.
3.29	Question 13 - Are there any additional actions that you suggest should be included within Strategic Objective 1? We have advised that: • Under the LAQM regime, where a USA or Progress Report indicates risk of an air quality objective not being achieved, the council is required to complete a Detailed Assessment (DA). LAQM.TG22 advises that for a DA, targeted ambient monitoring is required for a range of pollution sources. Various screening thresholds for these pollution sources, together with monitoring actions, if the screening confirms potential issues, are provided within LAQM.TG22. • DAERA's proposed expansion of the monitoring network should be targeted, having regard to district council LAQM review and assessment processes and associated screening.
3.30	Question 14 - Do you have any other comments about Strategic Objective 1? We have advised that: • We note that DAERA is to regularly engage with district councils, to include 2 formal meetings per year, to discuss locations for additional monitoring and additional pollutants.

	Such discussions should include the use of low cost air quality sensors, highlighting that Defra has recently funded development of PAS 4023:2023, '<i>Selection, deployment & quality control of low-cost air quality sensor systems in outdoor ambient air CoP</i>'.
3.31	Question 15 - Do you believe that the proposed actions for Strategic Objective 2, will deliver improved air quality legislation for Northern Ireland? Whilst we have advised DAERA that proposed actions for Strategic Objective 2 will deliver improved air quality legislation for Northern Ireland, we have highlighted that: - DAERA has already recently consulted upon draft Regulations to tighten annual mean particulate matter limits, targets and objectives within NI, in advance of this Strategy consultation. - Whilst DAERA has stated that progress is needed on particulate matter, ozone and nitrogen dioxide levels to meet WHO guidelines, no further tightening of standards for ozone (O₃) and / or nitrogen dioxide (NO₂) is proposed within the Strategy.
3.32	Question 16 - Are there any additional actions that you suggest should be included within Strategic Objective 2? We have noted and advised that: - DAERA has proposed a downward trend in the Wellbeing Framework NO₂ indicator, to 10 µg/m³, as a Strategy Indicator, to be adopted without any associated strengthening of the nitrogen dioxide (NO₂) legislation and objectives. - It is unclear what additional powers are available to NI councils, competent authorities and transport partners in the pursuit of this indicator. - DAERA should engage with NI councils, competent authorities and transport partners regarding additional necessary actions in pursuit of this indicator and / or concerning proposals to strengthen NO₂ standards.
3.33	By way of amplification, the Committee is advised that the '<i>Wellbeing Framework NO₂ indicator</i>' is assessed as an annual mean of urban traffic levels of nitrogen dioxide. The Committee is further advised that this 10 µg/m³ annual mean indicator is equivalent to the WHO annual mean Air Quality Guideline Value for nitrogen dioxide but that DAERA has not proposed or brought forward legislation, to date, to tighten the existing 40 µg/m³ annual mean objective for nitrogen dioxide to 10 µg/m³, in a manner similar that which it recently consulted upon for particulate matter. It is unclear, therefore, what additional legislative powers are available to NI councils and competent authorities and transport partners in pursuit of this 10 µg/m³ annual mean Wellbeing Framework indicator. For clarity, the Wellbeing Framework NO₂ indicator for 2025 was 27.2 µg/m³.
3.34	Moreover, the lowest monitored nitrogen dioxide (NO₂) annual mean concentration across Belfast in 2025 was 11.3 µg/m³, recorded at an urban background monitoring site in east Belfast. The majority of other roadside and kerbside NO₂ monitoring sites across the city recorded NO₂ annual mean concentrations typically in excess of 20 µg/m³ during 2025, but below the current annual mean objective of 40 µg/m³. 2025 air pollution monitoring data is summarised in the council's 2026 Progress Report, provided as a separate agenda item to this Committee meeting.
3.35	Question 17 - Do you have any other comments about Strategic Objective 2? We have advised DAERA that with regard to reviewing and simplifying air quality policy monitoring terms for the public:

	• Most UK air pollution information services already use the Committee on the Medical Effects of Air Pollutants (COMEAP) approved Air Quality Index, which presents pollution levels on a simple 1 (Low) to 10 (High) scale, and which is based upon concentrations of NO₂, SO₂, O₃, PM₁₀ & PM_{2.5}. • Real-time air quality monitoring data is available via the DAERA NI Air website, with passive monitoring results, commentary and exceedance reporting provided through council LAQM reports, also available via the DAERA NI Air website. • Any proposed reporting changes should align with COMEAP recommendations and approvals.
3.36	Question 18. Do you believe that the proposed new action for Strategic Objective 3 will deliver raised awareness and bring about behavioural change? In consideration of the Strategic Objective 3 action to launch air quality awareness and behaviour change campaigns, we have noted and indicated that: • This action will not deliver raised awareness and bring about behavioural change. • DAERA is to develop, launch and lead an awareness / behaviour change campaign, for each year for the Strategy, with topics including <i>'No idling' at schools; solid fuel burning; wet wood burning; Clean Air Primary Schools Campaign; indoor air quality and Clean Air Night / Day</i>. • Many of these campaigns have already been implemented by councils and target different air pollutants. • DAERA should deliver consistent awareness campaigns on a prioritised basis, taking account of the health disbenefits of respective air pollutants.
3.37	Question 19. Are there any additional actions that you suggest should be included within Strategic Objective 3? We have indicated that there are no additional actions that should be included within Strategic Objective 3.
3.38	Question 20 - do you have any other comments about Strategic Objective 3? We have advised that: • It is unclear if successive year-on-year awareness campaigns, over the 6-year lifespan of the Clean Air Strategy, targeting different air pollution messaging and priorities, will bring about the necessary behavioural changes referred to in Strategic Objective 3. • In many instances, significant progress can only be achieved through messaging in support of legislative controls such as, for example, The Air Quality (Domestic Solid Fuels Standards) Regulations 2020, as they apply to the sale of domestic wood, supply of certain manufactured solid fuels and supply of bituminous coal.
3.39	Question 21 - Do you believe that the proposed new actions for Strategic Objective 4, will help to achieve a fair and just transition to phasing out of coal, manufactured solid fuels and unseasoned wood for home heating? We have indicated 'no' in our response and highlighted to DAERA that: • Although DAERA's proposal to bring forward legislation to tighten of annual average particulate matter standards is welcomed, the home heating action for DAERA to issue a <i>'Call for Evidence', to seek views on bringing forward secondary legislation, to restrict or phase out coal and / or, manufactured solid fuels, and / or unseasoned wood'</i> by the end of 2027 is unlikely to result in any short term meaningful air quality impacts, as it is anticipated that it may take years for any secondary legislation to be introduced and implemented.

3.40	Question 22 - Are there any additional actions that you suggest should be included within Strategic Objective 4? We have responded 'yes' and advised DAERA that: • Recent PM emissions data indicated that significant NI PM emissions arise from agriculture, industrial processes and transport, in addition to residential, commercial and public sector combustion. • The Strategy does not appear to contain any significant commitments or actions to address these prominent particulate matter emission sources. • Fig. 15 NOx emissions shows that transport is the principal emission source for NI. • Whilst councils continue to work to achieve NO₂ objectives, the Strategy does not appear to contain any significant policy and / or legislative measures to directly reduce transport related air pollution.
3.41	Question 23 - Do you have any other comments about Strategic Objective 4? We have indicated that we have no other comments concerning Strategic Objective 4.
3.42	Question 24 - Do you believe that the proposed new actions for Strategic Objective 5, will deliver positive change to air quality in Northern Ireland through working with delivery partners? We have indicated 'yes' and clarified that: • Council welcomes DAERA's commitment that a Clean Air Forum will be established for all relevant stakeholders, as this is considered to be critical to the delivery of LAQM processes. • Whilst the council welcomes the proposed review of policy and technical guidance relating to air quality, net zero and environmental noise, we note that it is to be completed by 2030, and that the LAQM process for NI is to be reviewed by 2032. • We have recommended that these timescales should be bought forward.
3.43	Question 25 - Are there any additional actions that you suggest should be included within Strategic Objective 5? We have indicated that: • The legislative framework underpinning LAQM within NI urgently requires additional amendments, alongside the introduction of a clear and ambitious policy direction from key government Departments, to deliver the necessary positive changes. • Council would advocate that the NI Assembly considers designating a lead government Department, tasked with ensuring delivery of necessary LAQM functions across all Departments, as they are best placed to effect policy changes necessary to reduce emissions from transport and combustion sources for commercial and private premises. • Our strong view is that NI Air Quality legislation requires introduction of a statutory responsibility on a lead Department, to co-ordinate development and delivery of Action Plans, alongside the development and implementation of achievable regional policy plans to successfully deliver beneficial changes in air quality at a NI level.
3.44	Question 26 - Do you have any other comments about Strategic Objective 5? We have indicated that we have no other comments concerning Strategic Objective 5.
3.45	Question 27 - Do you believe that the proposed indicators for the Clean Air Strategy will effectively measure the success of the Strategic Objectives and their actions? We have indicated 'no' to this question and noted and advised that: • We have expressed concern regarding adoption of the Wellbeing Framework NO₂ indicator.

	• DAERA has advised that delivery of the Clean Air Strategy for Northern Ireland is to rely upon interdepartmental collaboration between DAERA, DfE, DfI & DoH, and district councils. • Whilst Delivery Plan actions have an identified lead and completion date, few actions will have a direct beneficial impact on NO₂ and PM concentrations within the Strategy lifetime.
3.46	Question 28 - Have you any comments on the Implementation and Governance proposals for the Clean Air Strategy? We have indicated to DAERA that • LAQM legislation urgently requires additional amendments, alongside introduction of a clear and ambitious policy direction from key government Departments, to deliver necessary air quality changes. • We would advocate that the Assembly considers designating a lead Department, tasked with ensuring delivery of LAQM functions across Departments, as they are best placed to effect the various policy changes necessary to reduce air quality emissions. • A lead government Department should co-ordinate development and delivery of Air Quality Action Plans, alongside development and implementation of regional policy plans to deliver beneficial changes in air quality.
3.47	We are not proposing to respond to consultation questions 29, 30, 31 and 32 concerning Equality and Disability, Rural Needs Impact, Strategic Environmental Impact and Habitats Regulations Impact Assessments for the draft Clean Air Strategy.
3.48	<u>Financial and Resource Implications.</u> There are no immediate financial or resource implications for the council in the development of this proposed consultation response to the DAERA Clean Air Strategy for Northern Ireland to 2032. The Report has been developed from within existing Scientific Unit air quality staff resources.
3.49	Council Air Quality Officers will, however, continue to develop and submit annual applications to the DAERA LAQM grant process to support existing LAQM projects and any new air quality actions, projects or obligations arising from the Clean Air Strategy for Northern Ireland to 2032.
3.50	<u>Equality or Good Relations Implications/Rural Needs Assessment</u> There are no Good Relations Implications or Rural Needs Assessment implications associated with this proposed consultation response.
4.0	Appendices - Documents Attached
4.1	Appendix A – Consultation response to the DAERA Clean Air Strategy for Northern Ireland to 2032.