

Appendix A – Consultation response to the DAERA Clean Air Strategy for Northern Ireland to 2032.

Department of Agriculture, Environment and Rural Affairs
Air and Environmental Quality Branch
1st Floor, Clare House
303 Airport Road West
Belfast
BT3 9ED

Via email: casni@daera-ni.gov.uk

Dear Sir / Madam

Re: Consultation on the 'Clean Air Strategy for Northern Ireland to 2032'.

Consultation questions.

1. What County do you live in? - **Co. Antrim.**
2. Are you responding on behalf of an organisation? – **Yes.**
3. If yes, please provide the name of your organisation - **Belfast City Council.**
4. Which background category best represents you? - **District Council.**
5. If other, please specify: N/A

Clean Air Strategy - Views on each Strategic Objective.

6. Do you agree with the aim of the draft Clean Air Strategy? (Y)
7. If no, please provide your comments about an alternative or additional aim:

Council notes that the Strategy's aim is to improve air quality across NI by 2032 for the benefit of human health & the environment.

Whilst the council agrees with this aim, we note that the Strategy is being consulted upon in late 2026, with an operational period to 2032. A new Strategy will have to be agreed within this time period to be available from 2033, alongside implementation of the current Strategy. It is considered that the Strategy should have a significantly longer lifetime to provide continuity of approach to improving air quality, supported by successive Implementation Plans.

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8. Do you agree with the three goals in the draft Clean Air Strategy? (N)
9. If no, please provide your comments about alternative or additional goals:

The 3 goals to be achieved by 2032 are:

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.
3. To increase public awareness of air quality issues and empower the public to take personal action to improve air quality.

It is considered that goal 2, *To reduce air pollution for a cleaner environment* should be amended to reflect more meaningful and tangible environmental outcomes and / or benefits such as safeguarding the natural environment and / or biodiversity.

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10. Do you agree with the five strategic objectives in the draft Clean Air Strategy? (Y)

11. If no, please provide your comments about alternative or additional Strategic Objectives:

N/A

Clean Air Strategy - Actions for each Strategic Objective.

Strategic Objective 1: Develop our Evidence Base.

12. Do you believe that the proposed new actions for Strategic Objective 1 will deliver an improved air quality evidence base across Northern Ireland? (N)

Please provide further detail to support your answer:

It is noted that DAERA has 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 consider that, when combined with atmospheric dispersion modelling, compliance can be assessed across a much wider geographical extent than through monitoring alone.

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13. Are there any additional actions that you suggest should be included within Strategic Objective 1? (Y)

Please provide further detail to support your answer:

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 the following emission sources; road traffic sources; non-road transport sources (airports, railways & ports); industrial sources; commercial and domestic combustion sources; and fugitive or uncontrolled sources. Various screening thresholds for these emission sources, together with monitoring actions, if the

screening confirms potential issues, are provided within Ch. 7 of LAQM.TG22. It is recommended that DAERA's proposed expansion of the air quality monitoring network should be targeted, having regard to the outworkings of the district council LAQM review and assessment processes and associated screening.

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14. Do you have any other comments about Strategic Objective 1?

It is noted that DAERA is to regularly engage with councils to include 2 formal meetings per year to discuss locations for additional monitoring / additional pollutants. It is considered that such discussions should include the use of low cost air quality sensors. Defra funded development of PAS 4023:2023, '*Selection, deployment & quality control of low-cost air quality sensor systems in outdoor ambient air CoP*' to standardise the use of low cost sensors as standalone units or as part of a network, to account for uncertainties, and to enable better integration with other AQ measurements.

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Strategic Objective 2: Improve Legislation.

15. Do you believe that the proposed actions for Strategic Objective 2, will deliver improved air quality legislation for Northern Ireland? (Y)

Please provide further detail to support your answer:

It is noted that DAERA has already consulted upon the Draft Air Quality (Amendment) Regulations (NI) 2026 to tighten annual mean particulate matter (PM₁₀ and PM_{2.5}) limits, targets and objectives in NI, in advance of this Strategy consultation.

Whilst DAERA have stated that progress is needed on current particulate matter, ozone and nitrogen dioxide levels to meet the more stringent World Health Organization guidelines, to reduce the negative impacts of air pollution and to save lives, no further tightening of standards for ozone and nitrogen dioxide is proposed within this Strategy.

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16. Are there any additional actions that you suggest should be included within Strategic Objective 2? (Y)

Please provide further detail to support your answer:

Strategic objective 2 includes the updating of existing particulate matter (PM₁₀ & PM_{2.5}) legislation to protect air quality and human health. It is noted, however, 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 or amplification of the nitrogen dioxide (NO₂) legislation and objectives. It is unclear, therefore, what additional powers are available to NI councils, competent authorities

and transport partner organisations in the pursuit of this indicator. It is considered that DAERA should therefore engage with NI councils, competent authorities and transport partner organisations regarding any additional necessary actions in pursuit of this indicator and / or concerning proposals to strengthen existing NO₂ limit values, targets or objectives.

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17. Do you have any other comments about Strategic Objective 2?

DAERA's commitment to review and simplify AQ terminology for the public is welcomed. However, it should be noted that most UK air pollution information services already use the COMEAP approved Air Quality Index, which presents pollution levels on a simple 1 (Low) to 10 (High) scale, similar to the UV & pollen forecasts, based on concentrations of NO₂, SO₂, O₃, PM₁₀ & PM_{2.5}. Real-time monitoring data is available via the DAERA website, with passive monitoring results, commentary & exceedance reporting provided through council LAQM reports. Any proposed changes should align with COMEAP.

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Strategic Objective 3: Raise Awareness and bring about behaviour change.

18. Do you believe that the proposed new action for Strategic Objective 3 will deliver raised awareness and bring about behavioural change? (N)

Please provide further detail to support your answer:

It is noted that DAERA is to develop, launch and lead an awareness and behaviour change campaign, for each year for the Strategy, with topics including *'No idling' at schools; solid fuel burning; wet wood burning; Clean Air Primary Schools Campaign; indoor air quality and Clean Air Night / Day.*

Many of these campaigns have, however, already been implemented by councils for some time, and target different air pollutants. It is considered that DAERA should deliver consistent awareness campaigns on a prioritised basis, taking account of the health disbenefits of respective air pollutants.

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19. Are there any additional actions that you suggest should be included within Strategic Objective 3? (N)

Please provide further detail to support your answer: 750 characters

20. Do you have any other comments about Strategic Objective 3?

It is unclear if successive year on year awareness campaigns, over the 6 year life of the Strategy, targeting different air pollution messaging and priorities, will bring about the

necessary behavioural changes referred to in Strategic Objective 3. It is considered that 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 & supply of bituminous coal.

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Strategic Objective 4: Work towards zero pollution.

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? (N)

Please provide further detail to support your answer:

DAERA's proposal to bring forward legislation to tighten of annual average particulate matter (PM₁₀ & PM_{2.5}) limits, targets and objectives in NI is welcomed. However, the home heating Strategy Action 4.1 for DAERA to issue a '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' 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 many years for any secondary legislation to be introduced and implemented.

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22. Are there any additional actions that you suggest should be included within Strategic Objective 4? (Y)

With regard to recent PM₁₀ and PM_{2.5} emissions for NI, figs 13 & 14 show that significant particulate matter emissions arise from agriculture, industrial processes and transport, in addition to residential, commercial & public sector combustion. The Strategy does not, however, appear to contain any significant commitments or actions to address these prominent particulate matter sources. A PEACEPLUS project and a draft Ammonia Strategy are mentioned. Moreover, fig. 15 concerning NO_x emissions shows that transport is the principal source. Whilst councils continue to work to achieve the 40 µgm⁻³ annual and 200 µgm⁻³ 1-hour mean objectives via the LAQM regime, the Strategy does not appear to contain any significant policy/legislative measures to directly reduce transport related air pollution. For example, no actions concerning the uptake of zero emission vehicles, etc.

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23. Do you have any other comments about Strategic Objective 4?

N/A

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Strategic Objective 5: Deliver Change through Partners.

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? (Y)

Please provide further detail to support your answer:

Council welcomes DAERA's commitment that a Clean Air Forum will be established for all relevant stakeholders, as this is considered critical to the continued successful delivery of LAQM processes.

Whilst the council welcomes the proposed review of policy & technical guidance relating to air quality, net zero & environmental noise, to improve connectivity between environmental policy matters, which is to be completed by 2030, and the Local Air Quality Management process for NI, which is to be reviewed by 2032, the council would suggest that these timescales should be bought forward.

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25. Are there any additional actions that you suggest should be included within Strategic Objective 5? (Y)

Please provide further detail to support your answer:

It is considered that the legislative framework underpinning LAQM urgently requires amendments, alongside the introduction of a clear & ambitious policy direction from key government Departments, to deliver necessary positive changes.

We would advocate that the 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 & combustion sources for commercial & private premises. Further, our strong view is that NI AQ legislation requires introduction of a statutory responsibility on a lead Department, to coordinate development & delivery of Action Plans, alongside development & implementation of achievable regional policy plans to successfully deliver beneficial changes in AQ at a NI level.

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26. Do you have any other comments about Strategic Objective 5?

N/A

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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? (N)

Please provide further detail to support your answer:

We have expressed concern regarding adoption of the Wellbeing Framework indicator.

Moreover, DAERA has advised that Strategy delivery will rely on interdepartmental collaboration between DAERA, DfE, DfI & DoH, & councils. Annex A is the Clean Air Delivery Plan. Whilst actions have an identified lead & completion date, it is considered that few actions will have a direct beneficial impact on NO₂ & PM levels within the Strategy lifetime, e.g. analysis of the 2026 consultation on solid fuel burning to determine further options will take time to develop and implement policy / legislation.

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28. Have you any comments on the Implementation and Governance proposals for the Clean Air Strategy? (Y).

LAQM legislation urgently needs additional amendments, alongside introduction of a clear and ambitious policy direction from key government Departments, to deliver necessary AQ changes.

We would advocate that the Assembly considers designating a lead Department, tasked with ensuring delivery of LAQM functions across Depts, as they are best placed to effect policy changes necessary to reduce AQ emissions.

A lead Dept should coordinate development and delivery of AQ Action Plans, alongside development & implementation of regional policy plans to deliver beneficial changes in AQ.

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29. Have you any comments on the Equality and Disability Screening Assessment of the draft Clean Air Strategy? (N)

Please provide further detail to support your answer:

N/A

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30. Have you any comments on the Rural Needs Impact Assessment of the draft Clean Air Strategy? (N)

Please provide further detail to support your answer:

N/A

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31. Have you any comments on the Strategic Environmental Impact Assessment of the draft Clean Air Strategy? (N)

Please provide further detail to support your answer:

N/A

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32. Have you any comments on the Habitats Regulations Impact Assessment of the draft Clean Air Strategy? (N)

Please provide further detail to support your answer:

N/A

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Yours sincerely,

Siobhan Toland
Director of City Services
City and Neighbourhood Services Department