

CONSULTATION ON A DRAFT REVISED UK AIR QUALITY PLAN FOR TACKLING NITROGEN DIOXIDE, MAY 2017	6th June 2017
TO: ENVIRONMENTAL SERVICES COMMITTEE	
FOR DECISION	

Linkage to Council Strategy (2015-19)	
Strategic Theme	Protecting and Enhancing our Environments and Assets
Outcome	Improvement in Air Quality
Lead Officer	Head of Health & Built Environment
Cost: (If applicable)	N/A

Background

DEFRA are seeking the views and comments of Council on the draft revised UK Air quality plan for tackling Nitrogen Dioxide.

The draft plan sets out proposed actions to meet air quality standards within the shortest possible time.

The consultation includes the following documents:

- draft UK Air Quality Plan for tackling nitrogen dioxide ('Improving air quality in the UK: tackling nitrogen dioxide in our towns and cities')
- technical report, including details of modelling techniques and assumptions used in the draft UK Air Quality Plan for tackling nitrogen dioxide

Attached as Appendix III is a response prepared by Environmental Health Northern Ireland (EHNI). The full consultation paper can be found at <https://consult.defra.gov.uk/airquality/air-quality-plan-for-tackling-nitrogen-dioxide/>

The closing date for submission of responses is 15th June 2017.

Recommendation

It is recommended that Council endorse this response.

Causeway Coast and Glens Borough Council Consultation Response

Consultation on a draft revised UK Air Quality Plan for tackling nitrogen dioxide, May 2017

The deadline for receipt of this consultation to Defra is 15 June 2017. Accordingly, it is proposed to submit this response in draft format to Defra subject to final council approval at its meeting on 27 June 2017.

Questions for consultation

1. How satisfied are you that the proposed measures set out in this consultation will address the problem of nitrogen dioxide as quickly as possible?

Causeway Coast and Glens Borough Council (CCGBC) considers that the focus of proposed measures as set out within the May 2017 Draft UK Air Quality Plan for tackling nitrogen dioxide is primarily targeted towards Local Authorities in England. It is noted however, that the actions focussed on Northern Ireland include:

- *Revising Northern Ireland's air quality policy and legislation and devise an Air Quality Action Plan.*
- *Ensuring Local Development Plans and planning decisions take account of existing regional strategic planning and transport policies and guidelines to encourage the use of walking, cycling and public transport.*

We would recommend that these actions in particular are brought forward as soon as practicable by the Department of Agriculture, Environment and Rural Affairs (DAERA), including for example, Northern Ireland specific Air Quality Strategy and Action Plan documents and an update to the various supporting policy guidance documents including Local Air Quality Management Policy Guidance LAQM PGNI (09). The council would wish to assist DAERA in the development of these documents and policies as Part III of the Environment (Northern Ireland) Order 2002 continues to place a duty upon councils to review and assess air quality in their districts, to designate Air Quality Management Areas and to develop actions plans in pursuit of the achievement of the health-based air quality objectives. The documents should be developed in partnership with all NI competent authorities and such bodies or persons representative of the interests of industry. Future documents should have a clear focus on both regional and local issues. Until there is clarity regarding the content of these documents, the specific actions and a quantification of the benefits that they will provide, Causeway Coast and Glens Borough Council is unable to comment on their propensity, coupled with national measures, to address the problems caused by high nitrogen dioxide concentrations within parts of the area.

2. What do you consider to be the most appropriate way for local authorities in England to determine the arrangements for a Clean Air Zone, and the measures that should apply within it?

What factors should local authorities consider when assessing impacts on businesses?

These questions relate only to local authorities within England and so Causeway Coast and Glens Borough Council has not provided a response. Causeway Coast and Glens Borough Council would however, want to be consulted and involved as soon as practicable on the development of a Northern Ireland Air Quality Strategy and Action Plan.

3. How can Government best target any funding to support local communities to cut air pollution? What options should the Government consider further, and what criteria should it use to assess them?

Are there other measures which could be implemented at a local level, represent value for money, and that could have a direct and rapid impact on air quality? Examples could include targeted investment in local infrastructure projects.

How can Government best target any funding to mitigate the impact of certain measures to improve air quality, on local businesses, residents and those travelling into towns and cities to work? Examples could include targeted scrappage schemes, for both cars and vans, as well as support for retrofitting initiatives.

How could mitigation schemes be designed in order to maximise value for money, target support where it is most needed, reduce complexity and minimise scope for fraud?

Causeway Coast and Glens Borough Council would welcome government funding support for prioritised and integrated policies and actions to improve ambient air quality across Northern Ireland as a whole. Specifically the implementation of a local infrastructure project to divert HGV traffic from the centre of Dungiven would address the current exceedance of EC limit values for Nitrogen Dioxide. More widely it is considered however, that significant investment must be prioritised towards connecting rural and urban locations across Northern Ireland, with an emphasis on tackling commuter congestion at particular geographical locations which presently experience concentrations of nitrogen dioxide in excess of EC limit values. There is an additional need to focus on the regional transport network (bus and rail) in order to better connect commuters living in the surrounding conurbations to the cities, without the need for reliance on single occupancy vehicles. Incentives must be introduced to make public transport the preferred option for the majority of commuters, in terms of cost, journey time and capacity. Presently, in many cases, it is cheaper for people to commute using their car than by train.

4. How best can governments work with local communities to monitor local interventions and evaluate their impact?

The Government and the devolved administrations are committed to an evidence-based approach to policy delivery and will closely monitor the implementation of the plan and evaluate the progress on delivering its objective.

Causeway Coast and Glens Borough Council note that '*actions focused only in NI*' are relevant to delivering improvements in Northern Ireland in accordance with the Northern Ireland Draft Programme for Government (PfG) 2016-2021. The inclusion of an air quality indicator within the Draft PfG is to be welcomed and it is evidence that fostering engagement around, and improving air quality is confirmed as a Government priority. We do however have some concern about the approach in relation to how the indicator is to be measured. It would appear that the indicator will make use of annual average concentrations across Northern Ireland at urban background and urban roadside NO₂ monitoring sites. For example, the "urban roadside sites mean" is the mean of all roadside or kerbside sites with at least 75% data capture. These mean values will then be assessed against the annual average limit value for NO₂ of 40µg/m³. The historical trend data contained within the PfG shows that since 2004, the means of the annual averages for urban roadside and background sites have consistently been below 40µg/m³, suggesting that NI is in compliance with the limit value at all locations and that there are no nitrogen dioxide air quality issues. In reality however, there are numerous locations across Northern Ireland, which continue to exceed the nitrogen dioxide annual mean limit value, including areas within the council area. As a consequence of the adoption of this air quality indicator, Causeway Coast and Glens Borough Council is concerned that air quality issues in locations of continued exceedance will be obscured, thereby compromising government and council abilities and actions to deliver the health based air quality limit values for nitrogen dioxide as soon as is possible.

Although a duty exists upon Northern Ireland councils to periodically review and assess air quality, and to develop and manage local air quality action plans, responsibility for regional strategic planning, public transport policy and for managing the road network lies with the Department for Infrastructure. Causeway Coast and Glens Borough 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 DfI not consider it appropriate to take up actions proposed at local level, councils do not have the legislative powers to compel the Department to implement them.

Accordingly, the council considers it critical that interventions and impact evaluation are informed by reliable good quality monitoring data in relation to both national and local policy decisions. As has been demonstrated in relation to dispersion modelling for some arterial road transport corridors within Belfast, relying solely upon modelling for forward projections of nitrogen dioxide is a high risk approach; particularly with regard to road NO_x. It is considered that long-term funding within DAERA should be secured on a needs basis to allow Northern Ireland local authorities to plan for air quality requirements, maintain monitoring networks and to carry out their legislative duties put on them relative to successful action evaluation.

5. Which vehicles should be prioritised for government-funded retrofit schemes? We welcome views from stakeholders as to how a future scheme could support new technologies and innovative solutions for other vehicle types, and would welcome evidence from stakeholders on emerging technologies. We currently anticipate that this funding could support modifications to buses, coaches, HGVs, vans and black cabs.

Specific to, Causeway Coast and Glens Borough Council consider that retrofit schemes on HGV's could potentially have direct air quality benefits within the Dungiven town centre, although this would require further investigation.

Causeway Coast and Glens Borough Council would welcome publication of revised yearly reduction factors for NO_x reflective of real world driving conditions and vehicle emissions.

6. What type of environmental and other information should be made available to help consumers choose which cars to buy?

The current government policy approach to transport, with a primary emphasis on the reduction of carbon dioxide emissions, has led to a rapid increase in the uptake of diesel-fuelled vehicles across Northern Ireland, which has had a corresponding significant detrimental impact on the actions to deliver National and European air quality standards. It is evident that current government policies need to be updated in order to address this issue, however, although actions to accelerate the uptake of ULEV may result in a lower environmental impact at their point of use, their overall impact is directly related to the manner in which the electricity to power them is generated. This should be considered appropriately. Consumers should be provided with adequate information to make informed decisions on all aspects of the potential environmental impacts a vehicle may have. Should the accelerated uptake of ULEV be a prioritised action for NI, significant investment will need to be put into the existing electricity generating and distribution networks and infrastructure, as it is believed that it does not currently have the capacity to accommodate such an increase.

7. How could the Government further support innovative technological solutions and localised measures to improve air quality?

Causeway Coast and Glens Borough Council is unable to respond to this question until Northern Ireland specific actions are confirmed.

8. Do you have any other comments on the draft UK Air Quality Plan for tackling nitrogen dioxide?

The government's modelling approach employed for the UK reports NI in compliance with the nitrogen dioxide annual mean limit value despite the local areas continuing to exceed the limit value. The draft UK Air Quality Plan for tackling nitrogen dioxide considers that establishing Clean Air Zones (CAZs) are the most effective way to bring the UK into compliance with NO₂ limit values in the shortest possible time. Unfortunately, the area of reported exceedance within Causeway Coast and Glens Borough Council is Dungiven town centre, which is without a viable alternative route currently. Accordingly, a CAZ would not be considered a suitable action to address this exceedance and alternative control measures will therefore have to be investigated.

National actions included within the Air Quality Plan, such as additional funding to accelerate the uptake of electric taxis do not explicitly demonstrate how they can help to deliver improvements in nitrogen dioxide concentrations across NI and particularly within the various Air Quality Management Areas.

It is the council's view that any new air quality action plan for nitrogen dioxide for Northern

Ireland should not solely focus upon delivering limit values within existing Air Quality Management Areas but it should also focus upon improving ambient quality for the population as a whole. While legal limits (EU Limits and UK Objectives) are in place to protect human health, evidence suggests that health effects can still occur well below these limits and any improvement in air quality will have positive health consequences. A Northern Ireland Air Quality Strategy should consider not only actions to meet legal limits, but also include assessment and quantification of how wider air quality improvements can benefit public health. This should include research in the relationship between air quality and public health, to establish if a reduction in air pollution will have long-term health benefits and potential savings to the Northern Ireland Health Service.