

Consultation on Draft Local Air Quality Management Policy Guidance – LAQM PGNI (09)

Comments by

Northern Ireland Environment Link

24 March 2010

Northern Ireland Environment Link (NIEL) is the networking and forum body for non-statutory organisations concerned with the environment of Northern Ireland. Its 58 Full Members represent over 90,000 individuals, 262 subsidiary groups, have an annual turnover of £70 million and manage over 314,000 acres of land. Members are involved in environmental issues of all types and at all levels from the local community to the global environment. NIEL brings together a wide range of knowledge, experience and expertise which can be used to help develop policy, practice and implementation across a wide range of environmental fields.

These comments are agreed by Members, but some members may be providing independent comments as well. If you would like to discuss these comments further we would be delighted to do so.

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Introduction

We welcome the opportunity to participate in the consultation process by responding to the draft policy guidance which district councils in Northern Ireland must have regard to in carrying out their local air quality management (LAQM) duties under Part III of the Environment (NI) Order 2002. We also welcome the intention that the chapters covering transport and planning will be taken into account by those working in relevant government and local government departments including environmental health, land-use, planning, economic development and transport planning. It is also encouraging that the Introduction of the document recognizes the importance of 'joining up' climate change and air quality policies. Good air quality should also be seen as an integral component of the Sustainable Development Strategy.

As the Introduction points out, air quality is important because poor air quality reduces human life expectancy in the UK by an average of 7-8 months, with equivalent health costs estimated at up to £20 billion a year. The UK Air Quality Strategy aims to reduce the effect on life expectancy to 5 months by 2020 and it is to be hoped that the present document will be used properly to ensure that Northern Ireland plays its full part in the achievement of this aim. NIEL is also concerned about the harmful impacts of poor air quality on the environment, including ecosystems and biodiversity, and we are pleased that the guidelines recognize the importance of developing integrated policies and co-ordination between district councils and other relevant authorities in Northern Ireland to control air pollution.

One area of possible concern is the monitoring of the performance of district councils in their actions to improve air quality. Financial cuts in the near future may compromise the effectiveness of the Department of the Environment in this monitoring and staffing shortages in the NIEA may make it more difficult for them to give adequate advice to district councils on pollution matters.

General Comments

The introductory letter to consultees states that the draft guidance is intended to "enable district councils to improve on the service they already provide...to work towards air quality objectives." The phrase 'work towards' is lamentably weak and should have been replaced with 'meet'. If the aim is only to work towards objectives then the objectives will never be achieved. The guidance must be followed to meet objectives.

The introductory letter to consultees then states that "The fourth round of district councils Review and Assessment of air quality commences in April 2009, and the aim of this document is to guide district councils towards further improving the management of air quality in their areas, focussing on what really matters and providing quantitative data, wherever possible, to demonstrate progress." Presumably we can therefore assume that the draft document is already one year or more behind schedule. This does not inspire confidence.

Section 1 of the draft guidance consists of seven Chapters that give an overview of local air quality management processes and principles. This section has either been compiled locally or is a British document that has been modified for Northern Ireland. It therefore

contains occasional typographical errors. However, the only consistent error is the use of 'compliments' which should be changed throughout the text to 'complements'. This section contains most of the guidance that will be of practical use to district councils and other authorities.

Section 2, entitled 'Measures to improve air quality', consists of nine sub-sections (Annex A – Annex I) containing detailed descriptions of how to format an action plan Progress Report, economic aspects of measures to improve air quality, cost-benefit analysis, guidance on Low Emissions Zones, measures to encourage the uptake of low-emissions vehicles and the retro-fitting of abatement equipment to vehicles and worked examples of these. Most of this material was produced for England but is also applicable to the devolved administrations. Much of the content will be potentially more useful to authorities other than district councils. For example, in Northern Ireland the retro-fitting of abatement equipment to public service vehicles is more relevant to DRD Roads Service and Translink.

Detailed Comments

Section 1

Chapter 1 Review and Assessment Reporting Cycles

We welcome the fact that district councils are **expected** to carry out a Review and Assessment every three years. However, we would request that the wording be changed to state that they are **required** to carry out the Review and Assessment every three years for clarification.

Chapter 3 Air Quality and Management Areas (AQMA)

We are pleased to see guidance for councils on the difficult question of how to draw the boundaries of an AQMA, and most of the points made are good ones. However, the following point is an exception:

- "Designating a number of smaller air quality management areas, rather than one single large area, can allow a council to demonstrate progress by 'ticking off' individual areas as air quality improves there;"

This does nothing to improve overall air quality. Its purpose seems to be to make life simpler for the council officials and for the civil servants in the Department. We believe that this should be removed from the final document.

Chapter 5 Consultation

Consultation with the Northern Ireland Environment Agency

We are pleased to see that NIEA continues to provide a range of support to district councils. We would like some assurance that this will continue despite any staff cuts in the Agency resulting from the current financial situation.

Consultation with the Public, Local Business and Other Stakeholders

We applaud the advice throughout this Section of the document to engage all stakeholders and publicise air quality initiatives. Perhaps public notices regarding air quality activities

could be regularly displayed on the websites of the district councils, the Department, and other authorities involved.

Chapter 6 Air Quality and Transport

This is a particularly important part of the document because Northern Ireland is relatively undeveloped industrially compared with other regions of the UK and transport is a major source of poor air quality. As the document points out, emissions from road vehicles are the most common reason for the designation of AQMAs in Northern Ireland and currently 17 of the 24 AQMAs list pollutants from roads as the main source of poor air quality.

Regulatory Measures to cut Vehicle Emissions

The document points out that vehicles are becoming cleaner and emissions from PM10 and NOx from road transport declined by 50% between 1990 and 2000 and are expected to lead to a further reduction of about 30% by 2010. Unfortunately, it is not clear whether these figures apply to Northern Ireland or the UK. Even more unfortunately, apparently the trend of declining emissions is expected to slow down from 2010 because of continuing traffic growth. Surely we can expect to see a Regional Transportation Strategy for Northern Ireland that includes targets to reduce private car transport and this should help to ensure a continuing decline in air pollution.

Centres for Excellence for Integrated Transport Planning

This initiative was set up by the Department of Transport in 2001 and now we are assured that DRD Roads Service will keep this initiative under review. We have nothing to show for the last nine years of review, so why mention the initiative in this document?