

Appendix 1 Consultation Questions

Chapter 1 - Sources and Effects of Air Pollution

1. Should there be legally binding targets for particulate matter, which are based on WHO Guidelines?

The WHO publish Air Quality Guidelines to support the setting of air quality standards worldwide by considering the body of evidence for key pollutants including particulate matter (PM2.5 and PM10). These guidelines represent recommended maximum levels for pollution in ambient air that countries should aim to achieve and are set purely on an understanding of the human health impacts. In setting these guidelines, the WHO do not consider the practicalities of policy development and implementation, including issues of costs and proportionality. Rather, the guidelines are intended to inform the process of setting standards alongside policy discussions. There are already legally binding ambient air quality standards for these pollutants.

We would only be in favour of implementing targets for particulate matter, based on WHO Guidelines, provided that there are clear policy measures identified in the Clean Air Strategy defining actions to ensure they are met.

2. Should all automatic monitoring sites measure at least NOx and PM?

The main source of PM is domestic/industrial whereas NOx is road traffic therefore having a single monitoring location for both pollutants would not always be appropriate, particularly where the site is in a residential area. Where any additional monitors are to be considered then these require to be fully funded.

3. Should the current urban air quality monitoring network be expanded?

District Councils review their air quality monitoring network annually through the current Review and Assessment Process and extend or reduce the monitoring sites accordingly. Expansion of the current monitoring network would be encouraged but must be fully funded.

4. Should a targeted approach to exposure, based on population, be used to expand the current monitoring network?

The current approach of monitoring based on relevant locations has been effective. Having a targeted approach based on population only will overlook small areas where there is a discreet problem having been identified through our review and assessment work to date

5. What are your views on using a population figure of 10,000 as a threshold that triggers the requirement to monitor air quality?

Using a population figure for triggering monitoring is not appropriate as there could be an air pollution problem in a small rural town with less than 10,000 population due to a congested road, whereas a large town of 10,000 may not have any relevant location affected by

pollution. In order to trigger monitoring there must be evidence from all review and assessments to date or local knowledge.

6. Should biomass heating be discouraged in urban areas or in areas with poor air quality?

Yes, evidence suggests that secondary burning including the installation of biomass appliances can give rise to PM issues. The Department should look at wider issues including the use of all solid fuels and supply of same across NI.

7. Should the connectivity between air quality and noise issues be improved through requiring consideration of each in Noise and Air Quality Action Plans?

Noise Action Plans are completed primarily by DfI, Translink and NIEA under the Environmental Noise Regulations (NI) 2006 that outline specific stages to manage and improve environmental noise whereas Air Quality Action Plans are completed by District Councils.

In relation to Noise Action Plans Councils have very little control over strategic and local road networks and as per Air Quality may have difficulty achieving same.

8. Given that air pollution, carbon emissions, and noise often share the same sources, what are your views on including noise and carbon emissions as a consideration in Low Emissions Zones?

It would be beneficial to include noise and carbon emissions as a consideration in Low Emissions Zones.

Chapter 2 - Transport Emissions

9. Are there any potential measures not included here that you believe could help encourage a shift away from private car use to walking, cycling, and public transport?

There should be consideration given to the expansion of the public transport system in more rural areas of the province, reduced fares, use of working from home policies and subsidised travel vouchers for use on public transport. Department should place increased priority on walking, cycling and rural transport networks to reduce the dependency on private motor car and rapid deployment of multiple fast charge e car points for both private and light commercial vehicles.

10. What would encourage you to consider buying an electric vehicle as your next car?

More competitively priced, interest free loans, tax incentives, improvements in technology, better battery life, and a significant increase in the public charging network across all local / rural settlements.

11. Do you think that DAERA should develop a Low Emissions Zone Framework for dealing specifically with transport emissions in Northern Ireland? Or

Would you be in favour of Low Emissions Zones for urban areas also covering other sources of pollution, for example, those from household heating?

A Low Emissions Zone Framework should be developed specifically dealing with transport emissions only as the paper states that Low Emission Zones are suited to NO2 emissions in the city centre and not trunk roads (p69). Household emissions can continue to be addressed through AQMAs and Smoke Control Areas.

12. What are your views on vehicle charging cordons for entry to the most polluted parts of urban areas in Northern Ireland?

If vehicle-charging cordons are to be introduced there must continue to be a choice and good alternative transport options to allow people to get into town centres.

Chapter 3 - Household Emissions

13. Should urban areas, in their entirety, be designated as Smoke Control Areas?

Urban areas that are shown to exceed air quality limits should be designated smoke control areas in their entirety, as opposed to specific areas of the urban area. However, urban areas, which have not demonstrably exceeded the air quality limits, should not be designated as a smoke control area. Designating urban areas in their entirety as a Smoke Control Area would have resource implications.

14. Should the law be changed so that non-smokeless fuels may not under any circumstances be sold in Smoke Control Areas?

The law should be changed to enable this. This will ensure more effective enforcement.

15. Should government ban the sale to the general public of smoky/bituminous/household coal in Northern Ireland?

Yes, however suitable arrangements should be made to ensure that domestic users have appropriate heating appliances installed or grant funded for same to ensure their appliances are appropriate and fit for purpose.

16. Should government ban the import, into Northern Ireland, of high-sulphur coal?

Yes any control to be effective must place appropriate controls on the point of import to adequately manage and control the sale of unsuitable products .

17. Should government ban the sale to the general public of unseasoned wood in Northern Ireland at retail outlets?

Yes, and introduced in line with the rest of the UK and Ireland

18. Are there any further things you think that central and local government could be doing to address air pollution from burning solid fuels?

The process of routine sampling of coal from local outlets by Local Authorities should continue with funding provided for analysis. Legislation should be reviewed to ensure that analysis of samples is in line with current good laboratory practice. It may also be beneficial to introduce Fixed Penalty Notices and a public awareness campaign.

Chapter 4 - Agricultural Emissions

19. Do you think that the process in place to address ammonia emissions in Northern Ireland is appropriate?

The current arrangements should be reviewed to ensure that current and projected targets are specific and focused on specific sources and standards are set taking account of current best practice in commercial , industrial and agricultural activity and the development of sustainable practices going forward .

Chapter 5 - Industrial Emissions

20. Are there any industrial sectors or air pollutants that require new or further investigation?

The current arrangements should be reviewed to ensure that current and projected targets are specific and focused on specific sources and standards are set taking account of current best practice in commercial , industrial and agricultural activity and the development of sustainable practices going forward .

Chapter 6 - Local Air Quality Management

21. Should councils more widely adopt low-cost air quality monitoring systems, for screening purposes?

Yes, some District Councils currently use these to supplement diffusion tube monitoring and this should be encouraged.

22. Should AQMAs should be discontinued and replaced instead with Low Emissions Zones, which cover all aspects of air quality, including Smoke Control?

As previously stated, our preference is that Low Emissions Zones should be developed specifically for dealing with transport emissions and other aspects of air quality including smoke control should be dealt with separately through AQMAs and Smoke Control Areas.

Historically AQMAs are declared if there has been a breach of air quality objectives. This will be in hotspot areas and based on having a relevant location. We need to ensure that these hotspot areas are still protected whilst maintaining areas where there is existing good air quality.

Needs to be more information as to what a low Emission Zone entails.

23. Where applicable, should the entirety of urban districts should be declared as AQMAs (or Low Emissions Zones)?

This may be beneficial in ensuring that more general climate change measures and air quality measures can be implemented throughout the District as a whole instead of targeted to a very narrow specific area as in the existing AQMA's.

24. What are your views on having a traffic-light system for councils to report on?

There would appear to be some benefit in the use of the traffic light system in that it helps present data in an easily understood manner. However more detail in how exactly this would be implemented would be required before more detailed comments could be made in particular towards pollutants like NO2.

25. What are your views on the proposals to change the LAQM process, in particular to grant funding for outcome-based measures as opposed to monitoring?

Council believe that it is important to continue to monitor the pollutant level so that any reduction or indeed increase in the pollutant level can be monitored over time. To implement an outcome-based measure there needs to be evidence of a problem. This is currently provided through monitoring. While grant funding based on outcome based measures may be a useful addition it should not automatically replace the existing regime. It is difficult to envisage how an outcome-based outcome would be measured unless there is ongoing monitoring of pollutant levels. Council would contend that grant funding should be direct funding to support these measures .

26. Are there any further measures you would suggest to help achieve a significant reduction or revocation of all AQMAs by 2021?

All councils with existing AQMAs have revoked AQMA's in their area in the past and this is purpose of annual review and assessment. It is anticipated that further revocations will take place in the future.

Mid Ulster Council have revoked 2 out of 5 AQMA's. There is also likely to be a third in Magherafelt. It is unlikely there is much prospect of revoking the remaining two barring bypasses of Moy and Dungannon.

Chapter 7 - Communication

27. Do you have any suggestions for the membership of the Air Quality Forum?

It is felt that an air quality forum would be beneficial to improving air quality in the province. It is felt that membership should consist at least of DfI Roads, Translink, Strategic Planning, Northern Ireland Housing Executive, Housing Associations , NILGA , Solace .

28. Is increasing awareness of air quality impacts at a local level is the best way of promoting behaviour change by individuals to reduce air pollution?

Yes, this can take the form of development of web site, local engagement, ongoing health and wellbeing development, climate change groups. Further measures can be using social media to highlight air quality issues.

29. Do you have any further comments or suggestions on how the impacts of policy interventions can be tracked in Northern Ireland?

The impacts of policy interventions can only realistically be tracked by continued monitored as is routinely carried out at present. It may also be beneficial to link with NISRA statistics, Increased working between organisations may help monitor specific data that may give useful statistics eg, traffic data etc.