

## **BCC 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 to Defra subject to final council approval at its meeting on 3 July 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?**

Belfast City Council (BCC) 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, Belfast City 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 Belfast Metropolitan Urban Area zone.

**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 Belfast City Council has not provided a response. Belfast City Council would however, wish 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?**

Belfast City Council would welcome government funding support for prioritised and integrated policies and actions to improve ambient air quality within the Belfast Metropolitan Urban Area zone and across Northern Ireland as a whole. 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, including for example, Belfast City Centre and the M1/ A12 Westlink corridor and York Street Interchange. Over 100,000 commuters travel into Belfast from other areas to work every day<sup>1</sup>. Workers travelling into and out of the city from neighbouring conurbations are therefore a significant contributor to road traffic congestion and to air pollution within Belfast, whilst Belfast residents exhibit some of the lowest instances of car ownership across Northern Ireland. Whilst completion of the York Street Interchange junction upgrade, the Belfast Rapid Transit project, the Transport Hub and Belfast Bikes public bike hire scheme will undoubtedly improve transport connectivity throughout the city, 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 city, without the need for reliance on single occupancy vehicles. Incentives must be introduced to make public transport the preferred option for

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<sup>1</sup> BCC Local Development Plan 2020-2035 - Preferred Options Paper Summary, January 2017.

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.**

We 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 and the implication of such an approach for Belfast. It would appear that the indicator will make use of annual average concentrations across Northern Ireland at urban background and urban roadside NO<sub>2</sub> 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 NO<sub>2</sub> of 40µg/m<sup>3</sup>. 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/m<sup>3</sup>, 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 Belfast. As a consequence of the adoption of this air quality indicator, Belfast City Council is concerned that air quality issues in locations of continued exceedence 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. Belfast City 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<sub>x</sub>. 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 Belfast, as a short term solution, Belfast City Council considers that retrofit schemes on buses, coaches and black cabs could potentially have direct air quality benefits within the city centre, although this would require further investigation.

Belfast City Council would welcome publication of revised yearly reduction factors for NO<sub>x</sub> 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 actions to deliver National and European air quality standards. It is evident that current government policies need to be updated 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 help them make informed decisions on all aspects of the potential environmental impacts a vehicle may have. If accelerated uptake of ULEV becomes a priority action for NI, significant investment will need to be put into the existing electricity generating and distribution networks and infrastructure, as they do not currently have the capacity to accommodate such actions.

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

Belfast City 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 for the UK, reports NI in compliance with the nitrogen dioxide annual mean limit value despite the Belfast Metropolitan Urban Area continuing to exceed this limit value. The draft UK Air Quality Plan for tackling nitrogen dioxide considers that establishing Clean Air Zones (CAZs) is the most effective way to bring the UK into compliance with NO<sub>2</sub> limit values in the shortest possible time. Unfortunately, the area of reported exceedence within Belfast is principally along the M1

Motorway / A12 Westlink corridor, which is classified as part of the strategic road network and therefore without a viable alternative route. Accordingly, a CAZ would not be considered a suitable action to address this exceedence 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. Perhaps of greater significance is the fact that although CAZs are considered by government to be the most effective means of achieving the nitrogen dioxide limit values, they are not mentioned as an option for the Belfast Metropolitan Urban Area, even as an opportunity for delivering air quality improvements in relation to wider health benefits. The council's forthcoming Local Development Plan Preferred Option Plan for Belfast contains an increased focus on city living and increasing the city centre residential population. The city centre is currently not designated as an AQMA due to a lack of relevant public exposure but new developments or redevelopment within the city centre will need to be supported by measures to protect and improve air quality. This challenge needs to be recognised by government and addressed in any future Northern Ireland government strategy, policies and actions.

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