

DAERA Consultation on the Draft Air Quality (Amendment) Regulations (Northern Ireland) 2026

MAG Response

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About you

Question 1. What is your name?

Ruth Hunter, Member of the Ministerial Advisory Group for Architecture & Built Environment NI

Question 2. What is your e-mail address?

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Question 4. Please tell us if you are responding as an individual or on behalf of an organisation. If you are responding on behalf of an organisation, please confirm the name of the organization and you have the authority to respond on behalf of the organisation?

Ministerial Advisory Group for Architecture & Built Environment NI

Question 5. Please indicate if you are happy for your response to be published?

Yes

Question 6. If you are responding on behalf of an organisation, please indicate if you are content for the name of the organisation to be associated with your response.

Yes

Proposed new annual average limits, targets and objectives for particulate matter (PM10 and PM2.5)

Question 7. To what extent to you agree with the proposed new annual average limit value of 20 µg/m³ for PM10?

Disagree

Please limit your response to 1500 characters or less:

MAG welcomes the proposed annual average limit value of 20 µg/m³ for PM10 and recognises it as an important step towards improved air quality and better public health outcomes in Northern Ireland. Reduced exposure to particulate matter can contribute to lower rates of respiratory and cardiovascular disease and improve population health generally.

However, MAG notes that the proposed limit remains above the current WHO Air Quality Guideline of 15 µg/m³. Given the growing evidence that adverse health effects occur at concentrations below previous regulatory thresholds, we question why the proposed limit does not align more closely with WHO's health-based recommendations. While we support the proposal as a meaningful improvement, we encourage DAERA to articulate a longer-term pathway towards achievement of WHO guideline levels and to clarify the evidence underpinning the selected limit.

From a built environment perspective, stronger standards can help drive healthier development, sustainable transport choices and improved place-making.

Question 8. To what extent to you agree with the proposed new annual average objective of 20 µg/m³ for PM10?

Disagree

Please limit your response to 1500 characters or less:

MAG supports the introduction of an annual average objective of 20 µg/m³ for PM10 as a positive mechanism for encouraging continuous improvement in air quality.

Nevertheless, we note that the proposed objective does not reflect the current WHO guideline of 15 µg/m³. Given that air quality objectives should provide long-term direction and ambition, MAG would welcome further

explanation as to why the objective is not aligned more closely with current health evidence.

We encourage the Department to view the proposed objective as an interim milestone within a broader strategy aimed at achieving WHO guideline levels over time. This would strengthen the integration of air quality considerations within planning, transport, housing and public health policy and support the creation of healthier places for current and future generations.

Question 9. To what extent to you agree with the proposed new annual average limit value of 10 µg/m³ for PM_{2.5}?

Disagree

Please limit your response to 1500 characters or less:

MAG strongly welcomes the proposed annual average limit value of 10 µg/m³ for PM_{2.5}, recognising the substantial health benefits that can arise from reducing population exposure to fine particulate pollution. PM_{2.5} is among the most harmful air pollutants because it can penetrate deeply into the lungs and enter the bloodstream.

However, it is important to recognise that the proposed limit remains double the current WHO Air Quality Guideline of 5 µg/m³. Evidence increasingly indicates that there is no clear safe threshold below which PM_{2.5} poses no risk to health. Consequently, MAG considers the proposed limit a significant step forward, but not the level ultimately required to provide optimum protection of public health.

We therefore support the proposal while recommending that the Department publish a longer-term trajectory towards WHO guideline levels and identify the policy interventions necessary to achieve this ambition.

Question 10. To what extent to you agree with the proposed new annual average target value of 8 µg/m³ for PM_{2.5}?

Disagree

Please limit your response to 1500 characters or less:

MAG welcomes the proposed target value of 8 µg/m³ for PM_{2.5} as an indication of greater ambition beyond the proposed statutory limit value.

However, the target remains above the WHO guideline level of 5 µg/m³ and therefore falls short of what current evidence suggests is necessary to maximise public health protection. While we recognise that practical, economic and technical considerations may influence the pace of implementation, it would be helpful for the consultation documents to explain more clearly why a less ambitious target has been selected.

MAG recommends that the target be viewed as an interim step and that government commits to periodic review of air quality standards in line with emerging evidence and international best practice.

Question 11. To what extent do you agree with the proposed compliance date of 1 January 2028 for these new limit values, target values and objectives for PM10 and PM2.5?

Strongly agree

Please limit your response to 1500 characters or less:

MAG supports the proposed compliance date of 1 January 2028. Given the established health impacts associated with particulate air pollution, early action is justified and necessary.

While the proposed standards do not fully align with WHO guideline levels, it is important that implementation of the revised standards is not delayed. Rapid progress towards lower levels of particulate pollution will deliver benefits for public health, environmental quality and health inequalities.

MAG encourages government to accompany implementation with transparent reporting arrangements and a clear commitment to future review and progressive strengthening of standards where evidence supports this.

Impact Assessments

Question 12. Do you agree or disagree with the conclusions of the Rural Needs Impact Assessment (RNIA)?

Agree

Please limit your response to 1500 characters or less:

MAG broadly agrees with the conclusions of the Rural Needs Impact Assessment and recognises that improved air quality standards are likely to generate health benefits for both rural and urban populations.

However, we recommend continued monitoring of rural impacts, particularly in relation to domestic heating, transport dependence, agricultural activities and access to support measures. It will be important to ensure that implementation does not inadvertently disadvantage rural communities or create barriers to compliance.

MAG would welcome ongoing engagement with rural stakeholders to assess both the benefits and any unintended consequences arising from implementation of the Regulations.

Question 13. Do you agree or disagree with the conclusions of the Equality and Disability screening?

Agree

Please limit your response to 1500 characters or less:

MAG agrees that the Regulations are likely to have positive impacts from an equality and disability perspective as cleaner air can particularly benefit groups who may be more vulnerable to the effects of air pollution, including children, older people, disabled people and those with pre-existing health conditions.

However, we recommend that monitoring and evaluation explicitly assess whether improvements are experienced equally across all communities.

Exposure to air pollution is often unevenly distributed and can disproportionately affect more deprived populations and communities located near major transport corridors.

MAG therefore encourages continued assessment of equality impacts throughout implementation and reporting.

Additional comments

Question 14. Do you have any additional comments you wish to raise with regards to the draft Regulations or consultation documents?

Please limit your response to 1500 characters or less:

MAG welcomes the Draft Air Quality (Amendment) Regulations as a positive and important step towards improving air quality and protecting public health in Northern Ireland.

However, we note that the proposed standards remain above the WHO Air Quality Guidelines for PM10 and PM2.5. While we recognise that regulatory change often requires a phased approach, we would welcome greater transparency regarding the rationale for selecting standards that fall short of current WHO recommendations and the evidence used to determine these levels.

MAG recommends that the proposed standards be presented as interim milestones within a longer-term programme aimed at achieving WHO guideline levels. We recommend publication of a roadmap setting out how NI intends to progress towards more health-protective standards over time.

As the Ministerial Advisory Group for Architecture and the Built Environment, we emphasise that air quality should not be considered solely an environmental issue. It is fundamentally linked to planning, transport, housing, place-making, climate resilience and population health. Achieving lasting improvements will require coordinated action across these sectors, including investment in active travel, sustainable transport, high-quality urban design, green infrastructure and healthy placemaking.

Overall MAG supports the proposed Regulations and their implementation but considers them a staging post rather than the final destination for air quality policy in Northern Ireland.

Prof Ruth Hunter, MAG Member