

UK NATIONAL AIR QUALITY STRATEGY:

Guidance for the Evaluation  
of Stage 3 Reviews  
and an Assessment of  
their Potential Effect on  
Key Oil Industry Installations



INSTITUTE OF PETROLEUM  
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# SUMMARY

The genesis and ambitions of the UK National Air Quality Strategy (NAQS) are described and examined. The choice of air quality objectives receives special attention both in the context of current European Union legislation and in relation to risk aversion. It is found that the UK's policy of focussing on the achievement of air quality targeted at preventing the occurrence of adverse effects in the most sensitive individuals irrespective of pre-existing medical conditions or natural life expectancy, plus a generous safety margin, represents an extremely conservative form of risk management. It is also probably unique in terms of public policy ambitions and public infrastructure design criteria; it is exceptional, if not unprecedented, in the sphere of public health care.

Consequently, if the sole or even principal aim of policy is to improve public health, priority should be given to other measures. Improvements to diet, food hygiene, housing, primary and secondary health care and, in particular, reducing tobacco smoking, are all likely to deliver much greater benefits and, for the most part, would be more cost-effective. It follows that NAQS objectives (and EU limit values) are already inappropriately stringent and no further layers of protection should be applied in the process of their implementation.

This report goes on to consider the guidance provided by government to inform local authorities on the technical and policy aspects of implementing the NAQS. This advice is found to be clear, thorough, helpful and pragmatic. If followed closely and completely air quality reviews and action plans should be consistent, balanced and objective. The guidance represents an invaluable yardstick by which to assess local authorities' NAQS assessments of present and future ambient air quality.

Finally, the report examines the potential impact on key oil industry installations of first round air quality reviews. In general these seem unlikely to have any significant effect on operations except in the case of three marketing terminals. One site, including access road, and highway access to the other two, fall within Air Quality Management Areas declared for nitrogen dioxide and particulates. Depending on the measures contained in the air quality action plans for these areas, yet to surface, the efficient and effective operation of the three sites could be compromised by restrictions on the operation of delivery vehicles.