

June 6th, 2024

Notice Of Meeting

You are requested to attend the meeting to be held on **Wednesday, 12th June 2024 at 7:00 pm** in **Church Street**.

Agenda

Agenda

(Attached)

📄 *EC 12.06.24 Agenda.pdf*

Page 1

1. Apologies

2. Declarations of Interest

Reports for Approval

3. Grant of Outdoor Entertainment Licence

(Report attached)

📄 *Item 3 Grant of Outdoor Concert Entertainment Licence DL.pdf*

Page 3

📄 *Item 3 Appendix 1 - EMP NIFRS Ward Park - Comments.pdf*

Page 6

📄 *Item 3 Appendix 2 - EMP PSNI response.pdf*

Page 8

📄 *Item 3 Appendix 3 - EHPD Comment RE EL Application Ward Park Live 9 and 10 August 2024.pdf*

Page 12

4. Applications for Indoor Entertainment Licences

(Report attached)

📄 *Item 4 Grant of Entertainment Licences.pdf*

Page 15

📄 *Item 4 Appendix 1 Letters from Objectors for the Nines.pdf*

Page 19

📄 *Item 4 Appendix 2 Report from Environmental Health for the Nines.pdf*

Page 27

5. Street Naming Report - Clandeboye Court, Bangor

(Report attached)

📄 *Item 5 Street Naming Clandeboye Court, Bangor.pdf*

Page 29

6. Request from Lidl Regarding Sunday Trading

(Report attached)

[Item 6 Sunday Trading.pdf](#)

Page 30

[Item 6 Appendix 1 - Letter from Lidl Northern Ireland Limited.pdf](#)

Page 32

7. Q3 and Q4 Service Plan Performance Reports

(Report attached)

7.1 Assets and Property Services

(Report attached)

[Item 7.1 APS Service Plan KPI Report 2023-24 Q3-4.pdf](#)

Page 33

7.2 Regulatory Services

(Report attached)

[Item 7.2 RS Service Plan KPI Report 2023-24 Q3-4 DL.pdf](#)

Page 37

7.3 Waste and Cleansing Services

(Report attached)

[Item 7.3 WCS Service Plan KPI Report 2023-24 Q3-4.pdf](#)

Page 41

8. Sustainable Energy Management Strategy and Action Plan

(Report attached)

[Item 8 Sustainable Energy Management Strategy and Action Plan.pdf](#)

Page 44

[Item 8 Appendix 1 ANDBC Strategic Energy Mgmt Strategy DRAFT v3 280224.pdf](#)

Page 46

[Item 8 Appendix 2 ANDBC Energy Strategy Action Plan DRAFT Feb 2024.pdf](#)

Page 67

9. Proposed Corporate Response to Consultation on "Rethinking our Resources: Measures for Climate Action and a Circular Economy in NI

(Report attached)

[Item 9 Consultation Response Rethinking Our Resources 2024.pdf](#)

Page 80

Reports for Noting

10. ANDBC Waste Resource Management Performance Review 2015 - 2024

(Report attached)

Item 10 ANDBC Sustainable Waste Resource Management Performance Review DL.pdf

Page 136

11. Q2 and Q3 Licensing Activity Report (July to Dec 2023)

(Report attached)

Item 11 Q2 and Q3 Licensing Service Activity Report July - December 2023 DL.pdf

Page 146

12. High Hedge Legislation Implementation

(Report attached)

Item 12 High Hedge Legislation Implementation.pdf

Page 150

Item 12 Appendix - Guidance for Complainants.pdf

Page 153

13. Any Other Notified Business

IN CONFIDENCE

Reports for Approval

14. Renewal of Tender for Cardboard Collected at the HRCs

(Report attached)

Item 14 Tender Extension Report for Cardboard Recycling from HRCs 2024 DL.pdf

Not included

ARDS AND NORTH DOWN BOROUGH COUNCIL

6 June 2024

Dear Sir/Madam

You are hereby invited to attend a meeting of the Environment Committee of Ards and North Down Borough Council in the Council Chamber, 2 Church Street, Newtownards on **Wednesday, 12 June 2024** commencing at **7.00pm**.

Yours faithfully

Susie McCullough
Chief Executive
Ards and North Down Borough Council

A G E N D A

1. Apologies
2. Declarations of Interest

Reports for Approval

3. Grant of Outdoor Entertainment Licence (Report attached)
4. Applications for Indoor Entertainment Licences (Report attached)
5. Street Naming Report – Clandeboye Court, Bangor (Report attached)
6. Request from Lidl Regarding Sunday Trading (Report attached)
7. Q3 and Q4 Service Plan Performance Reports (Reports attached)
 - 7.1. Assets and Property Services
 - 7.2. Regulatory Services
 - 7.3. Waste and Cleansing Services
8. Sustainable Energy Management Strategy and Action Plan (Report attached)
9. Proposed Corporate Response to Consultation on "Rethinking our Resources: Measures for Climate Action and a Circular Economy in NI" (Report attached)

Reports for Noting

10. ANDBC Waste Resource Management Performance Review 2015-2024 (Report attached)

11. Q2 & Q3 Licensing Activity Report (July to Dec 2023) (Report attached)

12. High Hedge Legislation Implementation (Report attached)

13. Any Other Notified Business

*****IN CONFIDENCE*****

Reports for Approval

14. Renewal of Tender for Cardboard Collected at the HRCs (Report attached)

MEMBERSHIP OF ENVIRONMENT COMMITTEE (16 Members)

Alderman Armstrong-Cotter	Councillor Kerr
Councillor Blaney	Alderman McAlpine (Chair)
Councillor Boyle	Councillor McKee
Alderman Cummings	Councillor McKimm
Councillor Cathcart	Councillor Morgan
Councillor L Douglas	Councillor Rossiter
Councillor Edmund	Councillor Smart (Vice Chair)
Councillor Irwin	Councillor Wray

Unclassified

3

ITEM 3**Ards and North Down Borough Council**

Report Classification	Unclassified
Exemption Reason	Not Applicable
Council/Committee	Environment Committee
Date of Meeting	12 June 2024
Responsible Director	Director of Environment
Responsible Head of Service	Head of Regulatory Services (Temporary)
Date of Report	30 May 2024
File Reference	90101
Legislation	The Local Government (Miscellaneous Provisions) (NI) Order 1985
Section 75 Compliant	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Other <input type="checkbox"/> If other, please add comment below:
Subject	Grant of Outdoor Entertainment Licence
Attachments	1. Comments of the NIFRS 2. Comments of the PSNI 3. Comments from Environmental Services

An application has been received for the grant of an outdoor entertainment licence for a concert to be held in Ward Park, Bangor, August 2024.

Applicant: Callum Richard Douglas, CRD Events Limited, 96 Old Ballygowan Road, Comber, BT23 5RX

Days and Hours: 9 August – 10 August 2024, 5pm to 10.45pm public access on show days.

Type of entertainment: Music

Proposed Occupancy – 20,000

Not Applicable

4

The application was publicly advertised as required under the Order and no objections were received.

The NIFRS, PSNI and Environmental Health have been consulted and their comments are attached. All have expressed concern about the concert and the information provided by the applicant to date.

To summarise the comments from each of the above Agencies:

NIFRS

Requests “a *Fire Risk Assessment and a set of marked up plans to permit an assessment to be made*”. This has not been provided to date.

Environmental Health

It is the opinion of the Environmental Health Service that, in the absence of an acoustic report to demonstrate otherwise, the noise conditions recommended to be attached to an Entertainment Licence, should it be issued, could not be met without compromising sound level and quality within the event.

A noise consultant’s report has not been provided to date. Additionally, the request from Environmental Health for a site meeting with CRD Events’ noise consultant at a previous site meeting has not occurred. Hence, they are unable to assess the application and the impact on local residents.

PSNI

PSNI cannot make a thorough judgement or satisfactorily enact their own planning procedures based on the EMP as it currently stands. Their concerns remain as noted in their letter (attached) and PSNI request that the Safety Plan/Event Management Plan be updated to adequately reflect these concerns.

In addition, PSNI notes the lack of a traffic management plan (TMP) and would request further information on this matter.

Note: The applicant has not liaised with PSNI regarding traffic management nor have they employed a Traffic Management company or applied for road closures.

Licensing Services

The applicant has been advised that the site plan previously provided is unsatisfactory and needs to be updated. Location of toilets, franchises, bars and emergency exits are unsatisfactory. Despite repeated requests an updated site plan has not been provided.

The applicant has not provided details of the performing artist. This information is essential in allowing all the agencies to properly assess the audience profile and the impact on local residents.

Not Applicable

5

Deputation

Under the Order an applicant shall be given an opportunity of appearing before and being heard by the Council before they decide on the application.

The applicant has been offered the opportunity to make representation at tonight's meeting and respond to any questions from Members.

RECOMMENDATION

It is recommended that the Council considers the comments of the NIFRS, PSNI, Environmental Health and the comments of the applicant and decide whether to grant or refuse this application.



**Northern Ireland
Fire & Rescue Service**

NIFRS | Bangor District Headquarters
92 Newtownards Road | Bangor | BT19 1AZ

T 028 91271906
E bangor.district@nifrs.org

F & T @NIFRSOFFICIAL
W www.nifrs.org

Jonathan Gamble
Assistant Group Commander

22nd May 2024

Our Ref: S21/21309

Mr P Prentice
Licensing and Regulatory Services
Ards and North Down Borough Council
2 Church Street
Newtownards
BT23 4AP

Your Ref: Lic 2175

Dear Sir

CONSULTATION RESPONSE

LOCAL GOVERNMENT (MISCELLANEOUS PROVISIONS) (NORTHERN IRELAND) ORDER 1985

Name of Premises: Ward Park Concert
Address of Premises: Ward Park, Bangor, BT20 5JW

File Ref: S21/21309

I refer to your consultation letter of 19th April 2024 and the fire safety information for an application for a grant of a licence in the above premises and to a desktop assessment of the fire safety information carried out by Northern Ireland Fire & Rescue Service (NIFRS).

The fire safety information assessed was:

Fire Safety Information	Dated/Reference Number
Application	Dated 15 th April 2024

Fire Safety Information	Dated/Reference Number
Fire risk assessment	Even plan provided 'Ward Park 24 EMP V3.2'
1 set of marked up as built fire safety plans	Plan provided 'Ward Park CAD V.3;
Engineered solution or management strategy (if applicable)	Not Provided

NIFRS consultation response is that:

NIFRS requests additional fire safety information to permit an assessment to be made which is:

- **A fire risk assessment.**
- **One set of marked up fire safety plans to include information such as marquees, bar-area, food stalls etc. This will allow NIFRS to calculate the correct floor-space factor. Escape routes are to be clearly marked and to scale to allow NIFRS to calculate exit widths. Also escape routes clearly defined to show how persons will be managed to escape to a place of total safety.**

Following receipt of the information NIFRS will provide a consultation response.

NIFRS has the following comments to make:

- **NIFRS notes that page 43 of Event Safety and Management Plan details actions of NIFRS. NIFRS requests that applicant ensures this is updated to correctly reflect the actions of NIFRS.**

Following the issue of a licence, NIFRS requests a copy be forwarded for our records.

Should you require further information, Watch Commander Mageean can be contacted on 028 44839309.

Yours faithfully



AREA COMMANDER

PSNI Lisburn
15 Barrack Street
Lisburn
BT28 1TJ

To whom it may concern,

Following the most recent revision to the event management plan, dated 13/5/24, the concerns from PSNI remain the same as our previous response. We do not feel that there has been sufficient revision to the document to satisfy our concerns over the current plans. We cannot make a thorough judgement or satisfactorily enact our own planning procedures based on the EMP as it currently stands. Our concerns remain as noted below and we would request that the Safety Plan/Event Management Plan be updated to adequately reflect these concerns.

Overall Event Queries:

- Who are the artists in attendance?
- What is the anticipated audience profile for each date if the artists are different? Age range, male to female ratio given the audience profile and profile from previous gigs of each artist? (this will likely have an impact on vulnerability/welfare and facilities). A 50:50 ratio for male to female each day may not be the case depending on the artist.
- Is the concert likely to attract under 16's? *If so, the map does not show the sizing of the safe zone/ family area mentioned in the plan with associated facilities and distance from the bars. Also, can the EMP include your child protection policy for those attendees under 18 years of age.*
- If under 16's are likely to attend, will there be a process to ensure they are with a responsible adult and a form of responsibility signed? Can the details of this be included in the EMP.
- How many youths will an adult be permitted to safely manage in the safe zone/ family area?
- How will the ticket sales be managed to ensure that the number of disabled tickets/ safe zone tickets are known, so the area can be effectively sized?
- What are the plans for the adjacent green area to the concert to ensure that those with no tickets do not attend and congregating in that area, potentially causing a disturbance? How are the adjacent areas being kept sterile as per the EMP plans?

Traffic Management Plan

Current comments/plan inadequate and we would request this is looked at. Previous concerts of this size have attracted a significant increase in traffic flow and public transport traffic, in addition to foot traffic in the area. This causes significant disruption to the town and residents living in close proximity.

- What company will be employed to produce and manage a suitable traffic management plan for the substantial increase in traffic in the area? This will require directional signage for those attending, traffic diversions, road closures for ingress/egress and coning of adjacent residential areas to prevent parking etc

- Have Road Closures been applied for? What roads do they cover and timings? The EMP mentions closing Castle Street maybe, will Gransha Road be included in this given one of the gates will exit onto this road?
- Coach Parking: none predicted from EMP but with indications of a popular artist and 20000 attendees this is highly likely given the location and previous history. Where will the drop off point be and where will coaches be directed to park?
- Disabled parking: Will there be a designated disabled parking area made available? If not, will there be a dedicated drop off point for disabled attendees?
- Taxi: Will there be a designated taxi drop off/collection area?
- Private Parking: What provision is there for additional 'off street parking' for attendees? Will this include shuttle buses if the car parks are a distance from the venue? I appreciate that the communication will be to use public transport/car pool, but there will need to be an indication of parking areas as the town centre car parks may not be able to cope with the increased volume of traffic and we don't want to encourage parking in side streets at an inconvenience to residents.
- Vendor parking: Where will vendors be parking for access to their wares for build and usage? Same for the ambulance as noted in the EMP, where will it be parked?
- Translink: What discussions have been had with translink in order to increase the buses or trains for attendees from Belfast and Ards? This includes later trains for a late finish or additional carriages and queuing/facilities. Will there be stewards onsite at the translink station to aid with queueing or is this being arranged with Translink performing this duty themselves?

Key Personnel: None noted in the appendices at this late stage.

- Who is the Deputy Event Controller to take over in the control room should the Event Controller need to leave the control room.
- Who is the Front of House manager, customer Care?
- Who is the site manager?
- Who is the medical/first aid manager from Pro Paramedics?
- Who is the traffic management manager?
- How many stewards will there be and how will they be identified? Will body worn video be used by stewards? Will there be a full stewarding plan from Alan Steele/Eventsec within the EMP?

Map

Can the map please be updated to clearly show the layout and dimensions of the site, not restricted to, but including;

- Gate identifiers (inc. gate size). EMP mentions gate 1 being the main entrance as it is closer to the train station. Which gate is this on the map?
- Family area/Disabled area (sizing). I appreciate it is identified in the EMP as a 40 person wheelchair platform with room for 1 companion and measurements are 20mx5m but given the discussion that this will also be the area for the safe zone for families/under 18's, can the sizing be added to the map for both areas?
- Stage area (sizes)
- Bars (sizes and queuing systems) – Is extra space being shown for flow around the site?

- Vendors (locations, sizes and queuing systems) map shows some blue squares but no key to identify what these are if they are vendors. No queuing systems at each point shown.
- Facilities -disabled facilities and vendor facilities. It mentions disabled toilets in the EMP, but not on the map.
- Medical provision- ambulance location on site. Is it outside the venue or at the Medical Centre?
- Welfare provision
- Parking for vendors/disabled if provided on site or nearby site.

Ingress/Egress

- What is the expected arrival period for attending patrons?
- How will early attendees be managed?
- Will there be a communicated piece to attendees for an agreed approach path to and from the venue?
- Will vendors, cleansing staff, stewards, artists, have an agreed approach path and gate to enter?
- How will tickets be checked including search regime?
- If patrons leave during the concert, will they be readmitted?

- What will be done to monitor any potential disruption to neighbours on entrance and egress?
- What safety measures will be in place to aid egress ie lighting within venue, additional measures within Ward Park across the river?
- Has a full assessment of the site been completed?
- In the event of an emergency evacuation, have egress capacities been calculated through each gate and what will be the communicated direction of travel beyond the gate? The EMP mentions in an emergency exit, attendees will be directed through exit routes from the main site *or* to an area of safety/ place of reasonable safety. Where is this?
- From the emergency plan, it states that PSNI/NIFRS will enact the emergency plan. This is not the case and is not consistent with the information in the EMP. Can this be amended?
-

Welfare

- If someone is not admitted due to intoxication or other reasons, what is the procedure for this?
- What are the arrangements for welfare provision outside of medical provisions?
- Has consideration been given to a dedicated welfare hub that would be suitable for taking separated persons to? Will this be staffed with persons with suitable safeguarding training?
- Has consideration been given to making announcements prior to the event to direct any separated persons to an identified hub/point as a meeting point?
- What is the ratio of staff to separated person who has a vulnerability? Is it 1:1 or 2:1?

Medical provision

- What plan is in place from the designated manager?
- What gate will this be accessible from? (gate number)
- The map shows the medical area next to the gate and bar, how accessible is this given bar queuing and ingress/egress from the gate?
- As per previous comment, where will the ambulance be located? How many ambulances will be onsite for a crowd of this size?

Site Build

- What is the detailed plan for site build and who will be in charge?
- What vendors will be on site on what days?
- How will the site be protected during the build?
- How many security on site and contact details?
- Will CCTV be used?

Comms

- What are the communication plans around the site during build, event and take-down.
- What is the contingency plan should comms fail?
- What is the procedure for transfer of authority to Police in the event of an emergency?

For your respectful consideration and response.

Constable C Magee

55979

Lisburn PSNI

Phone: 101 ext 67327

Email: carol.magee@psni.police.uk

EHPD Comment RE EL Application - Ward Park Live 9th and 10th August 2024Noise

Previous events of this scale in Ward Park have had the following conditions applied to their Entertainment Licence in respect of noise control, and EH would be requesting similar conditions:

1. *Music noise levels should not exceed an absolute limit of 75 dB $L_{Aeq(15 mins)}$ when measured 1m away from the façade of the nearest noise sensitive premises.*

The site size and orientation are different to previous events on the site. Although the stage is located facing towards SERC, Moira Drive is located stage right, there are no measurements as to the distance of the stage from the residential property, but knowledge of the site would indicate this is of a proximity where, even with specifically located directional speakers, it would be difficult to comply with this condition without severely impacting the sound quality of the event inside the site boundary.

The event organiser would be expected to employ an acoustic consultant who would monitor during the event and ensure this limit is not being exceeded. It has been indicated that Martin Grainger has been engaged and was confident that this condition could be complied with, however no acoustic report has been received to date.

2. *Music noise levels at the mixing desk shall not exceed 95dB $L_{Aeq(15mins)}$ from the start of the event until 19:00, and 98dB $L_{Aeq(15 mins)}$ between 19:00 and 22:45.*

The location of the mixing desk has been indicated as 45m from the stage, and these levels will be calculated by officers and agreed in conjunction with the acoustic consultant.

Again, the event organiser would be expected to employ an acoustic consultant who would monitor during the event and ensure limits are not being exceeded.

3. *The event shall finish at 22:45 in order that no music or noise from patrons at the event site shall be audible at the nearest noise sensitive properties after 23:00.*

The Event Safety and Management Plan states that the music will cease at 10.45pm and the site cleared by 11.30pm– this must be revised to clarify that the site shall be cleared by 11pm.

4. *The applicant (event promoter) shall set up a complaints line which shall be monitored throughout the event, and a complaint log shall be provided to Environmental Health after the event.*
5. *The telephone number for the complaints line shall be provided to the Council to enable calls regarding the event to be redirected from the Council to the complaint line.*
6. *The applicant shall issue letters to residents in the vicinity, as agreed with the licensing section, providing details of the times and duration of the event including sound checks; and details of the telephone number for the complaint line.*

The EMP indicates a sound check at 1pm on the day of the event. It would be expected that the acoustic consultant would attend with EH and a sound propagation test would occur the evening before the event to ensure the conditions are capable of being met and that there is sufficient time to make alterations to the site set up. At the site meeting, it was indicated that this would happen, however it is not currently reflected in any documentation.

7. *Consideration shall be given to the residents of the area when scheduling associated works including; set up and break down of the staging, sound equipment, lighting; portable WC's; fencing and other structures; and any noise generated between the hours of 23:00 and 07:00 shall be kept to an absolute minimum.*

It would be expected that no active set up or break down should occur during the hours of 23:00 and 07:00. An absolute minimum would take into consideration anything that is required during the night for the purposes of site security or health and safety.

The locations of all generators on the site will need to be pre-agreed with EH, as typically these will run continuously for several days. At the site meeting it was agreed that these would not run during the evening. The current site map has a bar located backing onto the residential properties, should this be the agreed location for any bar, an additional condition that no generators shall run between the hours of 23:00 and 07:00 will be added.

The sound management and environmental monitoring sections of the original EMP document lacked detail and incorrectly identified a Hotel as the nearest noise sensitive receptor.

This has not been addressed in the current version provided on 14th May 2024, which states that the acoustic report and management plan will be included "when ready".

This Service has received no contact or request to arrange a meeting with the Acoustic consultant acting on behalf of the applicant – contrary to what was agreed at the site meeting on 2nd May 2024.

The location and orientation of the stage remain unchanged in the updated CAD Drawing V3 provided 14.05.24.

It is the opinion of the Environmental Health Service that, in the absence of an acoustic report to demonstrate otherwise, the noise conditions recommended to be attached to an Entertainment Licence, should it be issued, could not be met without compromising sound level and quality within the event.

This is a factor not solely impacting the enjoyment of the concert experience but may also have implications for crowd safety, should the crowd surge forward to get closer to the stage where they may perceive that the noise level should be higher.

Site layout considerations & Other EH Concerns:

The comments previously made by this Service were e-mailed to the applicant and subsequently discussed at the site meeting on 2nd May 2024.

These included comments regarding Food Safety, Consumer Protection, Noise, Public Health and Health and Safety requirements.

The list of comments while extensive, was not an exhaustive list of matters that the applicant should address. EHPD are the enforcing authority for legislation relating to the above requirements, including health and safety at work legislation, specifically at events run by an organiser separate from the Council, where there is an element of employment. This includes events such as this one on Council land where the Council is not organising the event. While the Council are the enforcing authority, the duty to comply with all legal requirements rests with the event organiser as an employer or person conducting an undertaking. This Service can provide advice to the organiser of an event but as the enforcing authority, cannot sign off to confirm that documents such as the event management plan are acceptable.

As the event is to be held on Council land, further input may be provided by Corporate Health and Safety, Risk Management and Emergency Planning without the same conflict of interest that impacts this Service.

There are a number of important details absent from the current Event Management Plan, including details of key personnel from the management structure, first aid provisions, stewarding details, traffic management plan etc. These omissions and the lack of further information since the site meeting introduce a lack of confidence that this event can be delivered safely and with minimal impact on the residents of the area within the timescale remaining prior to the proposed date for the event.

Unclassified

15

ITEM 4**Ards and North Down Borough Council**

Report Classification	Unclassified
Exemption Reason	Not Applicable
Council/Committee	Environment Committee
Date of Meeting	12 June 2024
Responsible Director	Director of Environment
Responsible Head of Service	Head of Regulatory Services (Temporary)
Date of Report	03 June 2024
File Reference	90101
Legislation	The Local Government (Miscellaneous Provisions) (NI) Order 1985
Section 75 Compliant	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Other <input type="checkbox"/> If other, please add comment below:
Subject	Applications for Indoor Entertainment Licences
Attachments	1. Letters of Objection to the Nines Application 2. Report from Environmental Health in respect of the Nines

Applications have been received for the Grant of an Entertainment Licence as follows:

1. Cloughey Bowling Club - 17 Main Road, Cloughey, BT22 1JA

Applicant: Ally McArthur, Ards and North Down Borough Council, 2 Church Street, Newtownards

Days and Hours: Monday-Sunday, 9am to 1am

Type of entertainment: Dancing, singing or music or any other entertainment of a like kind.

Not Applicable

16

There are no objections to this application.

2. The Ranch - 95 Green Road, Bangor, BT19 7QA

Applicant: Cole Hogg, 51 Donaghadee Road, Millisle

Days and Hours: 14 days, 9pm – 1am

Type of entertainment: Dancing, singing or music or any other entertainment of a like kind.

No objections have been received to this application.

3. The Nines, Seacliff Road, Bangor

Applicant: Mr Damien Fusco, 3 Downshire Court, Bangor

Proposed days and Hours: Monday-Sunday, 9am to 12pm

Type of entertainment: Dancing, singing or music or any other entertainment of a like kind.

This application is to vary the existing licence to provide entertainment Monday-Sunday, 9am to 1am

There have been objections to this application from local residents (letters attached).

Their objections are:

David and Pauline Flood	<ul style="list-style-type: none"> Quality of life would be made unpleasant if entertainment was granted for each night of the week. Disturbance made by patrons leaving the premises late at night
William and Lynn McAvoy	<ul style="list-style-type: none"> Changes to the days of entertainment has the potential disruptions for noise disturbance and anti-social behaviour. Would impact on the neighbourhood's quality of life
David Speers	<ul style="list-style-type: none"> Area is a residential area not commercial. Concerned of potential that premises will attract more customers and as a result of them sitting outside during the summer will cause additional noise disturbance.

Not Applicable

17

John Thomson	<ul style="list-style-type: none"> Previously he has advised that premises is located within a residential area of the town and not in an area predominantly frequented for drinking.
--------------	--

There were no objections received from the PSNI or NIFRS.

Environmental Health had requested a revised Acoustic Report which has been provided. They have no objection to the application provided the following Terms and Conditions are applied to the licence (a copy of their report is attached):

As such, the following conditions should be attached if the entertainment licence is to be granted:

1. Entertainment shall be restricted to Monday to Sunday between the hours of 12pm and midnight.
2. External speakers shall not be used during periods of entertainment.
3. All windows to the ground floor shall be kept closed during entertainment.
4. All external doors to the ground floor shall be kept closed during entertainment.
5. The music shall only be sourced in the bar area.
6. The music shall only be of an easy listening nature with no heavy bass tones.
7. A competent person shall be present during each entertainment event, and he/she will have access to a sound meter device of not less than Class 2 standard, in order to monitor the sound level of the band or entertainment. Readings will be taken mid floor circa 2 metres from the musicians in the ground floor bar at the beginning and thereafter at regular intervals during entertainment.
8. Results of monitoring shall be recorded using a log sheet. The sound levels should not exceed 85dB LAeq (5 minutes). If the sound does exceed this level, then the competent person must ensure that the entertainment provider reduces the music level to the point where 85dB LAeq (5 minutes) is no longer breached.
9. When entertainment is taking place, the ability to talk or to hear what a person is saying should also be used by the competent person to gauge the sound level. If talking or hearing what is said becomes difficult, the sound level is too high.
10. Externally the competent person shall periodically patrol the exterior of the premises and at the nearest dwellings will assess the overall sound levels. Specifically, the bass levels shall be considered and if the sound and bass levels are distinctly audible and likely to cause disturbance then they will ensure that the entertainment providers lower the volume.
11. If, following monitoring of entertainment by the Council's Environmental Health Service, there appears to be unreasonable disturbance, the noise level stated in Condition 8 above may be reduced and/or the licensee may be

Not Applicable

18

required to re-engage their noise consultant to propose what further mitigation measures may be required. Any necessary mitigation measures shall be implemented to the satisfaction of the council officers.

History

The current licensee of these premises was granted an entertainment licence in October 2023 for Saturdays between the hours of 9pm and Midnight. There had been objections from residents at that time, but Council agreed to grant the licence.

There have been no complaints regarding noise from the premise since the licence was granted.

The applicant, Mr Damien Fusco has requested to make a representation to the Committee.

The objectors also wish to address the meeting and will be represented by one of their number. To be confirmed.

RECOMMENDATION

It is recommended that:

1. The Council grants the licences in respect of Cloughey Club and The Ranch;
and
2. In respect of the Nines, Seacliff Road, Bangor hears representations from the applicant and objectors before determining the application.

William / Lynn McAvoy

12th February 2024

Licensing and Regulatory Services
Ards & North Down Borough Council
The Castle, Bangor, BT20 4BT.

Subject: Objection to Entertainment Licence Application
(The Nines, 10-12 Seacliff Road, Bangor. BT20 5EY)
as predated 23rd January 2024 in the County Down Spectator 18.01.2024

Dear Sir/Madam

Re: Your letter dated 31.01.2024 Confirming that The Nines at 10-12 Seacliff Road, Bangor have applied to vary the days the premises can provide music from the present, one day (Saturday) to seven days a week.

We would like to confirm our objection to the proposed Entertainment Licence Application. Our apprehension primarily revolves around potential disruptions such as noise disturbances and antisocial behaviour, especially if there are alterations to the conditions of the entertainment licence.

As conscientious residents, we strongly believe that the proposed changes to the licensing conditions could escalate noise levels (seven days a week) and disrupt the tranquillity of the area. Our paramount concern is the well-being of the community, and we fear that alterations to the conditions may not adequately address these concerns.

We kindly request the Council to consider the potential impact on the neighbourhood's quality of life, as well as the safety and comfort of its residents. While we acknowledge the importance of supporting local businesses and entertainment, we equally emphasize the need to safeguard the interests of local private rate-paying homeowners.

We sincerely hope that the Council will conduct a thorough evaluation of this second entertainment licence application, considering the potential consequences of any alterations to the conditions, before arriving at a final decision.

Your attention to this matter is greatly appreciated.

Sincerely,
William / Lynn McAvoy



Imagine not knowing from night to night if you will get to sleep, or when you will get to sleep. Think of the effect that could have on our health and wellbeing in these difficult times.

We as ratepayers also need consideration here .

This is a residential area not commercial. It is not the main Street where there are pubs and clubs open to early morning.

At least there are no residents in that area.

I urge you to reject this application.

Yours faithfully,

A black rectangular redaction box covering the signature of David Speers.

David Speers

David & Pauline Flood



21-01-2024

Ards & North Down Borough Council.

Re: Application for Entertainments Licence, Fusco N.I. Ltd. T/A The Nines, 10/12 Seacliff Rd, Bangor. Advertised in County Down Spectator - 18-01-2024.

Fusco NI Ltd.

Dear Sir/Madam,

We read in the "Spectator" that another application has been made for an entertainments licence for The Nines Hotel, Seacliff Rd, Bangor. We would like to lodge an objection.

The application is, strangely, dated 23rd January 2024. The reason for applying again is unclear, as they have already been granted a licence.

If they are asking for modifications to the existing licence in this second application, "we as next-door neighbours", should have been informed in writing, as not everyone buys the "Spectator."

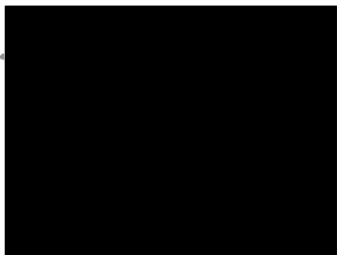
The application mentions "dancing, singing, or music, or any other entertainment of a like kind." What exactly does that mean? How often and within which hours?

Our objections to the granting of another licence are based on the probable detrimental effect on the lives of residents in the area, some of whose homes are in close proximity to the Nines.

Noise from the music, customers leaving the premises late at night, taxis and private cars, are all disturbing to the residents in the area.

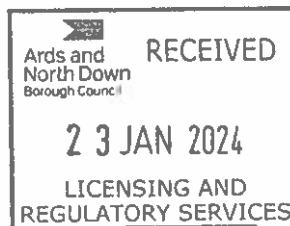
Thank you,

David and Pauline Flood

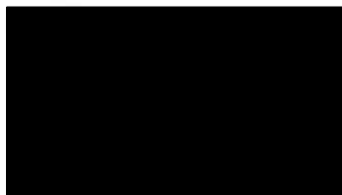


25 JAN 2024

Received



David & Pauline Flood



12-02-2024

Ards & North Down Borough Council.

Re: Application for Entertainments Licence, Fusco N.I. Ltd. T/A The Nines, 10/12 Seacliff Rd, Bangor. Advertised in County Down Spectator - 18-01-2024.

Dear Sir/Madam,

Once again, we are in the unfortunate position of having to express our objection to the application for an entertainment licence for the Nines.

Initially the licence was supposed to be on the same basis as the licence issued to the previous owner, who recognised the difficulties faced by nearby residents caused by loud music, noisy patrons leaving late at night etc. and had agreed to take measures to ensure this disruption was kept to a minimum, a few times a year.

We understand the new owners must make their business profitable, and we accept that there may be a few occasions when music is part of the atmosphere.

However, now we see the licence application proposes the entertainment could be on, as in your letter dated 31st January 2024, Any or All nights of the week.

This would make the quality of life for nearby neighbours very unpleasant, and we feel we must therefore lodge our continuing objection.

Thank you,

David and Pauline Flood



Imagine not knowing from night to night if you will get to sleep, or when you will get to sleep. Think of the effect that could have on our health and wellbeing in these difficult times. We as ratepayers also need consideration here . This is a residential area not commercial. It is not the main Street where there are pubs and clubs open to early morning. At least there are no residents in that area.

I urge you to reject this application.

Yours faithfully


David Speers

David Speers

Ref: Objection to The Nines Entertainment Licence Application.
The Nines,10-12 Seacliff Road,Bangor BT20 5EY

Dear Sir/Madam

I write to make clear my strong objection to the above application.

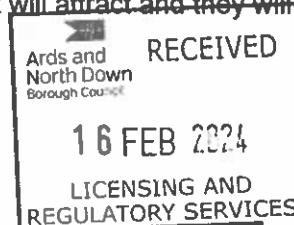
An ad was placed in the Spectator, which I do not regularly read, advising of an application to extend the current entertainment licence from 1 day per week to 7 days per week. Three months after the first application a second is put in without apparent thought for their neighbours. Imagine choosing to buy an apartment for a leisurely,peaceful retirement (all residents currently at or about retirement age) after careful research in to the area and neighbours. At that time, the Salty Dog with very restricted entertainment. Then a change of ownership and our retirement plans are diminished. We accommodated one night per week without going to Council to put our case, in the interest of harmony with our business neighbours.

I would add, to this day, I have never received notice from the Council itself of the change of application. Surely, as Alan Willis, the Entertainment Officer, is aware of our proximity to The Nines, immediately beside with our bedroom window just above and 3 feet to the left of the outdoor frontal area of The Nines, we should have received a letter of notice/explanation from the Council. In the Summer especially it is 11pm and later before the noise subsides. To make matters worse, some of the residents did receive a belated letter, possibly after complaining. Perhaps there is no legal need but I would have thought it appropriate as we are all ratepayers to the Council.

At the first Council meeting granting the licence that I listened to there was a feeling of The Nines is a business creating employment for Bangor and deserves the benefit of the doubt. There was only one lady Councillor who had concern for the residents and wanted further consideration to be given possibly including noise assessments before making the decision. That was rejected.

The problem now is that Summer is coming and brighter, longer nights mean more customers sitting outside my bedroom window and to the rear of our building which lies in to the Nines open Courtyard with tables, all residents at No. 8 can hear that noise via open windows and extractor fans in their bathroom wall.

The more nights live entertainment is on the more people it will attract and they will spill outside.




John Thomson
ANDBC CORPORATE ADMIN
CITY HALL, BANGOR

24 JAN 2024

Signed: 

Licensing and Regulatory Services
North Down Borough Council
The Castle
BANGOR
BT20 4BT
licensingandregulatoryservices@ardsandnorthdown.gov.uk

19th January 2024

Dear Sir/Madam,

Re: The Nines Entertainments Licence Application

I am writing to object to the application dated 24th January 2024 for an entertainment licence by The Nines hotel, bar and restaurant at 10-12 Seacliff Road.

The Nines previously applied for an entertainment licence back in June 2024 which, despite objections, they were successful in gaining. Following my last objection we met with Johnny Fusco, his PR/Marketing man and the manager of The Nines to go over our concerns. It was a productive meeting attended by myself and other residents where they assured us that they would be providing low key, post dinner acoustic music in an effort to retain customers who had eaten earlier in the restaurant. Subsequently they have had music on a Saturday night in the lead up to Christmas with no discernible effect on the block. Because of this, I am at a loss as to why they are applying for another entertainment licence and would like to know what this new licence is for that is different to their existing licence. Mr Fusco said at our meeting that he would keep us informed of any developments or plans for the future. This is obviously not the case.

We do not want them to fail as a business and I personally have used The Nines for a drink and dinner on several occasions. They are doing a great job at revitalising the area and the increased job opportunities and economic growth they create are welcome, however, I would very much like to know what this second licence is for? Until this is answered and I can make an informed decision on the application I must stick with my objection.

Many thanks


John Thomson

25 JAN 2024

Received

William / Lynn McAvoy


22th January 2024

Licensing and Regulatory Services
Ards & North Down Borough Council
The Castle, Bangor, BT20 4BT.

Subject: Objection to Entertainment Licence Application
(The Nines, 10-12 Seacliff Road, Bangor. BT20 5EY)
as predated 23rd January 2024 in the County Down Spectator 18.01.2024

Dear Sir/Madam

We are reaching out to express our objection to the issuance of a second entertainment licence for The Nines at 10-12 Seacliff Road, Bangor. Our concern arises from the fact that The Nines was granted a licence with conditions in October 2023, and we seek clarification on the need for a second licence. Our apprehension primarily revolves around potential disruptions such as noise disturbances and antisocial behaviour, especially if there are alterations to the conditions of the entertainment licence. Despite assurances made during a discussion with the new owners in September 2023, we have not been kept informed of their future intentions or plans. Additionally, unauthorized installation of lighting fixtures and cabling to our property has further raised concerns about their regard for residents' rights.

As conscientious residents, we strongly believe that any changes to the licensing conditions could escalate noise levels and disrupt the tranquillity of the area. Our paramount concern is the well-being of the community, and we fear that alterations to the conditions may not adequately address these concerns.

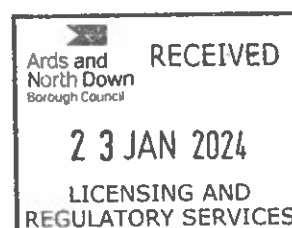
We kindly request the Council to consider the potential impact on the neighbourhood's quality of life, as well as the safety and comfort of its residents. While we acknowledge the importance of supporting local businesses and entertainment, we equally emphasize the need to safeguard the interests of local private rate-paying homeowners.

We sincerely hope that the Council will conduct a thorough evaluation of this second entertainment licence application, considering the potential consequences of any alterations to the conditions, before arriving at a final decision.

Your attention to this matter is greatly appreciated.

25 JAN 2024

Sincerely,
William / Lynn McAvoy



Response to the request to vary The Nines Entertainment Licence

This Service was consulted by the Council's Licensing and Regulatory Service in relation to an application to vary the Entertainment Licence currently held by 'The Nines'. The current Entertainment Licence permits entertainment on Saturdays between the hours of 9pm and midnight. The application to vary the Entertainment requested the proposed days and hours to be 'The permitted hours during which intoxicating liquor may be sold or consumed on these premises under the Licensing Order (NI) 1996'. We were notified by the Council's Licensing and Regulatory Service that the proposed days and hours were amended to 12 noon to 12 midnight, 7 days per week.

A number of objections to the variation of the Entertainment Licence were lodged with the Council's Licensing and Regulatory Service.

On 21st February 2024 EHPD requested that the applicant undertake a Noise Impact Assessment to assess the potential impact on neighbouring properties of holding entertainment on 7 days per week until midnight compared to the current permitted frequency of 1 night per week (Saturday). A Noise Impact Assessment was submitted to this Service on 17th May 2024. Clarification and correction of some points were required, and the updated assessment was submitted to this Service on 24th May 2024.

It is notable that this Service has not received any noise complaints while entertainment has been taking place in accordance with the conditions previously applied. Taking account of this fact, and considering the report provided by the Acoustic Consultant following his investigation and subsequent assessment, this Service would not object to the variation of the entertainment licence applied for.

It is, however, important to note that the Acoustic Consultant's report was based on certain parameters including the level and type of entertainment provided. In particular, the findings of the report are based on evidence gathered during entertainment of an acoustic genre and so heavy bass tones, which can be disturbing at lower levels, were not a material consideration. The applicant has indicated to this Service that this is the intended nature of entertainment to be provided and this aspect will be required to be managed in-house.

As such, the following conditions should be attached if the entertainment licence is to be granted;

1. Entertainment shall be restricted to Monday to Sunday between the hours of 12pm and midnight.
2. External speakers shall not be used during periods of entertainment.
3. All windows to the ground floor shall be kept closed during entertainment.
4. All external doors to the ground floor shall be kept closed during entertainment.
5. The music shall only be sourced in the bar area.
6. The music shall only be of an easy listening nature with no heavy bass tones.
7. A competent person shall be present during each entertainment event, and he/she will have access to a sound meter device of not less than Class 2 standard, in order to monitor the sound level of the band or entertainment. Readings will be taken mid floor circa 2 metres from the musicians in the ground floor bar at the beginning and thereafter at regular intervals during entertainment.
8. Results of monitoring shall be recorded using a log sheet. The sound levels should not exceed 85dB LAeq (5 minutes). If the sound does exceed this level, then the competent person must ensure that the entertainment provider reduces the music level to the point where 85dB LAeq (5 minutes) is no longer breached.

9. When entertainment is taking place, the ability to talk or to hear what a person is saying should also be used by the competent person to gauge the sound level. If talking or hearing what is said becomes difficult, the sound level is too high.
10. Externally the competent person shall periodically patrol the exterior of the premises and at the nearest dwellings will assess the overall sound levels. Specifically, the bass levels shall be considered and if the sound and bass levels are distinctly audible and likely to cause disturbance then they will ensure that the entertainment providers lower the volume.
11. If, following monitoring of entertainment by the Council's Environmental Health Service, there appears to be unreasonable disturbance, the noise level stated in Condition 8 above may be reduced and/or the licensee may be required to re-engage their noise consultant to propose what further mitigation measures may be required. Any necessary mitigation measures shall be implemented to the satisfaction of the council officers.

Unclassified

29

ITEM 5**Ards and North Down Borough Council**

Report Classification	Unclassified
Exemption Reason	Not Applicable
Council/Committee	Environment Committee
Date of Meeting	12 June 2024
Responsible Director	Director of Environment
Responsible Head of Service	Head of Regulatory Services (Temporary)
Date of Report	01 May 2024
File Reference	FP/2024/0939/MAST / 91200
Legislation	Local Government (Miscellaneous Provisions) (Northern Ireland) Order 1995
Section 75 Compliant	Yes <input type="checkbox"/> No <input type="checkbox"/> Other <input checked="" type="checkbox"/> If other, please add comment below:
Subject	Proposed Street Naming - Clandeboye Court, Bangor
Attachments	None

A development comprising of 20 apartments within three individual apartment blocks is currently under construction on lands at 116 Clandeboye Road, Bangor

The developer has requested the name Clandeboye Court for the new development.

The name is appropriate for the site location and is in keeping with the general neighbourhood.

RECOMMENDATION

It is recommended that Council agree to adopt the street name Clandeboye Court for this development and delegates acceptance of suffixes to the Building Control department.

Unclassified

30

ITEM 6**Ards and North Down Borough Council**

Report Classification	Unclassified
Exemption Reason	Not Applicable
Council/Committee	Environment Committee
Date of Meeting	12 June 2024
Responsible Director	Director of Environment
Responsible Head of Service	Head of Regulatory Services (Temporary)
Date of Report	29 May 2024
File Reference	90101
Legislation	The Shops (Sunday Trading &c) (NI) Order 1997
Section 75 Compliant	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Other <input type="checkbox"/> If other, please add comment below:
Subject	Request from Lidl regarding Sunday Trading
Attachments	Appendix 1 - Letter from Lidl Northern Ireland Limited

Lidl Northern Ireland Limited has written to express their gratitude for the support during the Covid pandemic when the Sunday opening hours were relaxed by the Council.

The company is now requesting that the Council considers designating Newtownards and Bangor (Holywood Exchange sites outside our Borough) as 'seasonal towns' in order that they can benefit from extended Sunday opening hours.

Under the Shops (Sunday Trading &c) (NI) Order 1997 a Council can designate an area as a holiday resort which would permit extended Sunday trading hours in large shops between 1 March and 30 September each year.

Currently large shops with a retail space over 280 square metres can only open on a Sunday between the hours of 1pm and 6pm excluding Easter Sunday or Christmas Day; with a few exceptions including petrol stations, pharmacies and motor suppliers.

Not Applicable

31

Under the Order a Council can designate an area as a Holiday Resort which would remove the Sunday restrictions on up to 18 days between March and September. The term holiday resort is not defined in the Order.

Ards Borough Council has previously designated Donaghadee and Ballywalter as Holiday Resorts.

The designation process is set out in the Order.

Before making any designation, a Council must first consult persons appearing to the it to be likely to be affected by the proposed determination (whether as the occupier of shops or as local residents) or persons appearing to the Council to represent such persons.

If the Council subsequently makes a designation, it must publish a notice of the designation.

RECOMMENDATION

It is recommended that the Council considers the request from Lidl Northern Ireland.



Stephen Reid
Chief Executive
Ards and North Down Council
The Castle Town Hall
Bangor
BT20 4BT

9th May 2024

Re: Extended Sunday Opening Hours

Dear Stephen

I hope this letter finds you well. On behalf of Lidl Northern Ireland, I am writing to express our gratitude for the support and cooperation we received from Ards and North Down Council, particularly regarding the extension of Sunday opening hours during the Covid-19 pandemic.

The flexibility provided by extended Sunday opening hours was invaluable in meeting the needs of our customers and communities, especially during that challenging time. We deeply appreciated the opportunity to serve our customers beyond traditional operating hours, enhancing accessibility and convenience for all.

Recognising the positive impact of extended Sunday opening hours in 'seasonal towns', we believe that there is an opportunity to further extend this benefit to communities across Northern Ireland. Expanding the initiative to a wider network of stores would support local economies by promoting increased footfall and economic activity during summer months. We understand that legislation gives Councils the authority to assign as many 'seasonal towns' as they wish, and we feel that the status of the below should be considered further:

- Lidl Newtownards, 4 Castlebawn Roundabout, Newtownards, BT23 4XE
- Lidl Bangor, 97 Bloomfield Road, Bangor, BT20 4XA
- Lidl Holywood, Unit A Holywood Exchange Retail Park, Airport Road West, Belfast BT3 9EJ

We respectfully request that Ards and North Down Council consider our proposal and explore the possibility of expanding the number of stores benefiting from extended Sunday opening hours.

We are committed to working closely to address any concerns and ensure a smooth and successful expansion of this initiative. Thank you for your attention to this matter. We look forward to the opportunity to discuss this proposal further and to the potential positive impact it could have on communities across Northern Ireland.

Chris Speers
Property Director

Iyan Ryan
Regional Managing Director

Lidl Northern Ireland Limited

Reg. Office: Dundrod Road, Nutts Corner, BT294SR, Crumlin, Co. Antrim – Northern Ireland – VAT Reg. No.: GB304775894 – Company Reg. No. NI 647629
Tel.: + 353 (0) 1 421 2000 – www.lidl-ni.co.uk
Postal Address: Head Office, Main Road, Tallaght, Dublin 24 – Rep. Ireland
Bank Details: Commerzbank AG, Stuttgart. BIC: COBADEFFXXX, IBAN: DE55 6004 0071 0522 9240 00 (EUR)
Commerzbank London. BIC: COBAGB2X, IBAN: GB20 COBA 4062 0130 7451 50 (GBP)

Unclassified

33

ITEM 7.1**Ards and North Down Borough Council**

Report Classification	Unclassified
Exemption Reason	Not Applicable
Council/Committee	Environment Committee
Date of Meeting	12 June 2024
Responsible Director	Director of Environment
Responsible Head of Service	Head of Assets and Property Services
Date of Report	29 May 2024
File Reference	43600
Legislation	Local Government Act 2014
Section 75 Compliant	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Other <input type="checkbox"/> If other, please add comment below:
Subject	Q3 & Q4 Service Plan Performance Report
Attachments	Half Yearly Performance Report

Context

Members will be aware that the Council is required, under the Local Government Act 2014, to have in place arrangements to secure continuous improvement in the exercise of its functions. To fulfil this requirement the Council approved the Performance Management Policy and Handbook in October 2015. The Performance Management Handbook outlines the approach to Performance Planning and Management process as:

- Community Plan – published every 10-15 years
- Corporate Plan – published every 4 years (Corporate Plan Towards 2024 in operation)
- Performance Improvement Plan (PIP) – published annually in September
- Service Plan – developed annually (approved April/May 2023)

Not Applicable

34

The Council's 18 Service Plans outline how each respective Service will contribute to the achievement of the Corporate objectives including, but not limited to, any relevant actions identified in the PIP.

Reporting approach

The Service Plans will be reported to relevant Committees on a half-yearly basis as undernoted:

Reference	Period	Reporting Month
Quarter 2 (Q2)	April – September	December
Q4	October – March	June

The report for Q4 is attached.

Key points to note:

- The action plan accompanying the sustainable energy management strategy was delayed as the strategy took longer to develop than first anticipated. The document has strong linkages to several other key documents including the corporate plan, the roadmap to sustainability and green fleet feasibility study, all of which are only recently developed. The strategy is before the Council for approval this month.
- As stated previously the biofuel trial had to be put on hold due to significant cost increases invoked almost immediately after the Council agreed the trial, making it unfeasible. HVO remains a potential short-term fuel to be explored in our forthcoming "Roadmap to Green Fleet" document.
- The timescales for completion of jobs remains an ongoing problem due to workload, staff absences and difficulty recruiting for vacant posts.
- We were underspent by 19% largely due to fluctuation in utilities costs.
- Several items of planned maintenance of public areas could not be completed due to wet weather preventing painting.

Key achievements:

- Refurbishments included Whiterock toilets, Clifton Road car park, Balloo ERC cladding replacement and Balloo HRC kiosk replacement.
- Over 5400 maintenance jobs completed this year.

RECOMMENDATION
















It is recommended that the Council notes the report.

Not Applicable








Half yearly Performance Report - Assets and Property Services

Generated on: 29 May 2024

Last Update H2 2023/24

Performance Data Traffic Light Icon	PI Short Name	Performance Data Current Value	Performance Data Current Target
	% of applicable properties achieving an E rating or better	91%	80%
	Set action plan implementation dates for Sustainable Energy Management Strategy	No	Yes
	Trial of Biofuel in the fleet completed and results reported back	No	Yes
	No. of roadside audits completed	90	90
	% of fleet audited	5%	5%
	% of condition surveys completed against the schedule (cumulative)	100%	100%
	No. of refurbishments carried out according to the schedule	Yes	Yes
	% of time that life belts are serviceable	99%	90%
	% of vehicles that pass PSV first time	93%	95%
	% of maintenance jobs completed within timescales	60%	80%
	% of maintenance jobs quality assured	37%	10%
	% spend against budget	81.24%	100%
	Internal Customer Feedback surveys completed	Yes	Yes
	Review findings of customer feedback survey and implement improvements	Yes	Yes
	Implement audit recommendations to ensure compliance with Port marine safety code	100%	100%

Not Applicable

Performance Data Traffic Light Icon	PI Short Name	Performance Data Current Value	Performance Data Current Target
	Review findings of harbour berth holder survey and implement improvements	Yes	Yes
	% questionnaires issued to berth holders	100%	100%
	% staff attendance	94.6%	93%
	% staff receiving team briefings	100%	100%
	% planned training vs actual completed as per training register (cumulative)	100%	80%
	% playground inspections are carried out as per schedule	100%	90%
	Planned maintenance of public areas carried out according to the schedule	No	Yes

Unclassified

37

ITEM 7.2**Ards and North Down Borough Council**

Report Classification	Unclassified
Exemption Reason	Not Applicable
Council/Committee	Environment Committee
Date of Meeting	12 June 2024
Responsible Director	Director of Environment
Responsible Head of Service	Head of Regulatory Service (Temporary)
Date of Report	3 June 2024
File Reference	43600
Legislation	Local Government Act 2014
Section 75 Compliant	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Other <input type="checkbox"/> If other, please add comment below:
Subject	Q3 & Q4 Service Plan Performance Report
Attachments	Half Yearly Performance Report

Context

Members will be aware that Council is required, under the Local Government Act 2014, to have in place arrangements to secure continuous improvement in the exercise of its functions. To fulfil this requirement Council approved the Performance Management Policy and Handbook in October 2015. The Performance Management Handbook outlines the approach to Performance Planning and Management process as:

- Community Plan – published every 10-15 years
- Corporate Plan – published every 4 years (Corporate Plan Towards 2024 in operation)
- Performance Improvement Plan (PIP) – published annually in September
- Service Plan – developed annually (approved April/May 2023)

Not Applicable

38

The Council's 18 Service Plans outline how each respective Service will contribute to the achievement of the Corporate objectives including, but not limited to, any relevant actions identified in the PIP.

Reporting approach

The Service Plans will be reported to relevant Committees on a half-yearly basis as undernoted:

Reference	Period	Reporting Month
Quarter 2 (Q2)	April – September	December
Q4	October – March	June

The report for Q4 is attached.

Key points to note:

- The budget overspend is due to reduced Car Parking income. The percentage overspend figure reflects the significance of the car park income budget as a proportion of the Department's overall budget, and the Departmental overspend is largely a consequence of this reduced income stream rather than an increased spend in services.

Key achievements:

- The successful introduction of a new carparking contract, Dogs on Leads scheme and the introduction of increased fixed penalty fine limits have been important developments for the service moving forward.
- The maintenance of extremely high levels of online applications and satisfaction levels is a credit to the teams.

Emerging issues:

- Due to the new method of appraisals, further work is required to maximise employee engagement moving forward.

Action to be taken:

- Car parking income to be reviewed in light of current car park usage levels.
- Staff attendance to be more closely scrutinised.

RECOMMENDATION

It is recommended that Council note this report.

Not Applicable

39











Half yearly Performance Report - Regulatory Services

Generated on: 03 June 2024

Last Update H1 2023/24

Performance Data Traffic Light Icon	PI Short Name	Performance Data Current Value	Performance Data Current Target
	% Fee income against YTD budget (Building Control)	97%	50%
	Review of income generation - % self-sustained	88%	90%

Last Update H2 2023/24

Performance Data Traffic Light Icon	PI Short Name	Performance Data Current Value	Performance Data Current Target
	Deliver LHLH grants through RCIF	£25,000.00	£25,000.00
	Redesign the delivery model for the Environmental ELLA programme to year 8's	Yes	Yes
	% spend against budget	174.83%	100%
	% of all applications made online (cumulative)	90%	55%
	Maintain top 3 position for Fixed Penalty Enforcement in NI	No	Yes
	Develop and implement Building Control awareness campaign	Yes	Yes
	% of buildings taken to certified completion	86%	93%
	Deliver and implement a new car parking enforcement contract	Yes	Yes
	Deliver a pilot signage scheme for dogs on leads at Ballyholme Promenade	Yes	Yes
	Develop and deliver an inspection and education package in relation to the licensing of Pavement Cafes	Yes	Yes

Not Applicable

Performance Data Traffic Light Icon	PI Short Name	Performance Data Current Value	Performance Data Current Target
	% customer satisfaction survey (services easily accessed)	90%	70%
	% customer satisfaction survey (Regulatory Services processes)	87%	70%
	% customer satisfaction survey (staff courtesy and helpful)	92%	80%
	% customer satisfaction survey (regulatory services outcomes)	88.5%	80%
	% Staff attendance	88.86%	93%
	% staff receiving regular team briefings	100%	100%
	% of completed Employee Appraisals in the period September 2023 to March 2025	56%	100%
	Introduce new maximum fine levels for fouling and litter	Yes	Yes
	Initiate working groups in relation to the various strands within the agreed car parking strategy	Yes	Yes

Unclassified

41

ITEM 7.3**Ards and North Down Borough Council**

Report Classification	Unclassified
Exemption Reason	Not applicable
Council/Committee	Environment
Date of Meeting	12 June 2024
Responsible Director	Director of Environment
Responsible Head of Service	Head of Waste & Cleansing Services
Date of Report	30 May 2024
File Reference	
Legislation	
Section 75 Compliant	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Other <input type="checkbox"/> If other, please add comment below:
Subject	Half Yearly Performance Report for 2 nd half of 2023 – 24.
Attachments	

Context

Members will be aware that Council is required, under the Local Government Act 2014, to have in place arrangements to secure continuous improvement in the exercise of its functions. To fulfil this requirement Council approved the Performance Management Policy and Handbook in October 2015. The Performance Management Handbook outlines the approach to Performance Planning and Management process as:

- Community Plan – published every 10-15 years
- Corporate Plan – published every 4 years (Corporate Plan Towards 2024 in operation)
- Performance Improvement Plan (PIP) – published annually in September
- Service Plan – developed annually (approved April/May 2023)

Not applicable

The Council’s 18 Service Plans outline how each respective Service will contribute to the achievement of the Corporate objectives including, but not limited to, any relevant actions identified in the PIP.

Reporting approach

The Service Plans will be reported to relevant Committees on a half-yearly basis as undernoted:

Reference	Period	Reporting Month
1 st Half	April – September	December
2 nd Half	October – March	June

The report for October 23 – March 24 is attached.

Key points to note:

- While the aspirational 60% recycling target was not met, the annual recycling rate increased by almost 3% from the 22/23 rate to 55.5%.
- The LEAMS Cleanliness Index surveys were re-established for the 2nd half of the year.

Key achievements:

- The recycling rate at the Council HRCs has increased to almost 70% for the 2nd half of 2023/24.

Emerging issues:

- The Textile recycling market in NI, is currently experiencing severe difficulties meaning that it may be necessary to delay the launch of the kerbside collection service to ensure that a viable market exists for collected materials.

Action to be taken:

- None

RECOMMENDATION

It is recommended that Council note this report.











Not applicable

43

Half yearly Performance Report - Waste and Cleansing Services

Generated on: 30 May 2024

Last Update H2 2023/24

Performance Data Traffic Light Icon	PI Short Name	Performance Data Current Value	Performance Data Current Target
	Tonnage of municipal solid waste sent to landfill (Half Year)	15,494	17,500
	% of household waste recycled, reused and composted (for 2023 – 2024)	55.48%	60%
	Amount (tonnes) of biodegradable waste sent to landfill (for 2023 – 2024)	14,395	17,124
	Improve the recycling rate at the Council's HRCs (Half Year)	69.9%	65%
	Local Environmental Audit and Measurement Score (LEAMS) (Street Cleansing) (Half Year)	73	80
	Add kerbside textiles collection to Glass collection service	No	Yes
	Full review of Council's Waste Management Services	Yes	Yes
	% spend against budget (for 2023 – 2024)	103%	100%
	Loo of the Year Awards (for 2023 – 2024)	5	5
	% staff appraisals carried out (for 2023 – 2024)	93%	100%

Last Update H1 2024/25

Performance Data Traffic Light Icon	PI Short Name	Performance Data Current Value	Performance Data Current Target
	% staff attendance (for 2023 – 2024)	92.59%	93%

Unclassified

44

ITEM 8**Ards and North Down Borough Council**

Report Classification	Unclassified
Exemption Reason	Not Applicable
Council/Committee	Environment Committee
Date of Meeting	12 June 2024
Responsible Director	Director of Environment
Responsible Head of Service	Head of Assets and Property Services
Date of Report	22 May 2024
File Reference	50002
Legislation	
Section 75 Compliant	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Other <input type="checkbox"/> If other, please add comment below:
Subject	Sustainable Energy Management Strategy and Action Plan
Attachments	1. Sustainable Energy Management Strategy 2. Action Plan

The Council's Sustainable Energy Management Strategy and Action Plan sets out the Council's commitment to effective energy and carbon management and outlines the next steps on our journey toward achieving net zero emissions in our estate, addressing the critical challenges and opportunities in our transition to a sustainable future. This document focuses purely on our estate and is to be read alongside our "Roadmap to Sustainability", our Corporate Plan (2024 to 2028) and our forthcoming "Roadmap to Green Fleet".

This strategy is designed to direct our policies, investments, and initiatives over the coming years, ensuring that we meet our environmental targets while fostering economic resilience and social well-being.

Not Applicable

45

The Council has an aging estate and achieving net zero by 2050 will require significant commitment and investment. It will only be possible by taking radical steps to maximise energy efficiency, reduce carbon emissions, improve governance arrangements and committing the human and financial resources required to carry out all of these measures.

At the same time, we must do this by balancing customer expectations and budgetary limitations with the need for sustainable investments.

RECOMMENDATION

It is recommended that the Council agrees the draft strategy and action plan attached.



**Ards and
North Down**
Borough Council

**Sustainable Energy Management Strategy
2024- 2029**



April 2024

Prepared with the Assistance of:



Contents

- 1 Executive Summary 3
- 2 Introduction 4
- 3 Background 5
- 4 The Road to Net Zero: the challenge ahead 7
 - 4.1 Carbon Offsetting..... 8
- 5 Strategy aims / themes 9
 - 5.1 Enabling Themes 10
 - 5.1.1 Improved Governance, Accountability and Oversight of Energy Management within the Council 10
 - 5.1.2 Improve resource availability for energy management..... 12
 - 5.2 estates Strategy..... 14
 - 5.2.1 Stakeholder Engagement in Energy and Carbon Management..... 14
 - 5.3 Zero and Low Carbon Technologies 14
 - 5.3.1 Renewable electricity generation 14
 - 5.3.2 Low carbon heat..... 15
 - 5.3.3 Technology Solutions 15
 - 5.3.4 Lighting technology 15
 - 5.3.5 Building Management Systems..... 15
 - 5.3.6 Monitoring & Targeting..... 16
 - 5.4 Fleet Management..... 16
- 6 Conclusion 18
- Appendix 1 Sustainable Energy Action Plan 19
- Appendix 2 Annual energy consumption and carbon emissions overview 20

1 EXECUTIVE SUMMARY

The Council's Sustainable Energy Management Strategy and Action Plan sets out the Council's commitment to effective energy and carbon management and outlines the next steps on our journey toward achieving net zero emissions in our estate, addressing the critical challenges and opportunities in our transition to a sustainable future. This document focuses purely on our estate and is to be read alongside our "Roadmap to Sustainability", our Corporate Plan (2024 to 2028) and our forthcoming "Roadmap to Green Fleet". This strategy is designed to direct our policies, investments, and initiatives over the coming years, ensuring that we meet our environmental targets while fostering economic resilience and social well-being.

Council has an aging estate and achieving net zero by 2050 will require significant commitment and investment. It will only be possible by taking radical steps to maximise energy efficiency, reduce carbon emissions, improve governance arrangements and committing the human and financial resources required to carry out all of these measures.

At the same time, we must do this by balancing customer expectations and budgetary limitations with the need for sustainable investments.

2 INTRODUCTION

An independent review of the Council's existing energy management arrangements was completed by Adrian Davis of AD Sustainability, which informed the development of this strategy and action plan document.

The key aims of this Strategy and Action Plan are to:

- Maximise the efficiency of energy usage.
- Minimise energy related carbon emissions from the Council estate.
- Reduce the Council's dependency on grid electricity and fossil fuels.
- Ensure effective governance and oversight arrangements are in place for energy management.
- Ensure effective resources, both human and financial, are in place to facilitate effective energy management.
- Establish the Council as an 'exemplar' organisation for the wider business and residential communities across the entire Borough regarding sustainable energy management practices.
- Achieve financial savings and minimise the impact of high energy prices.

3 BACKGROUND

Relevant Legislation

The Climate Change Act (Northern Ireland) 2022 (“the Act”) sets a target of an at least 100% reduction in net zero greenhouse gas (GHG) emissions by 2050 (i.e., net zero emissions by 2050) for Northern Ireland compared to baseline, along with interim targets including an at least 48% reduction in net emissions by 2030. This document sets out these targets in real terms and outlines possible ways of achieving them.

In addition, the Act set a target of 80% of electricity within the distribution network must come from renewables by 2030. This will require more than doubling the current renewable electricity generation to meet the growth in demand as consumers electrify heat and transport. This is an extremely ambitious target and will involve extensive works to achieve.

Whilst a transition towards a renewable grid will go some way to achieving our Climate Change Targets without us taking any direct action, this is not seen as a sufficient step towards sustainability in isolation as the current and estimated future demand for renewables far exceeds the supply. Therefore, all consumers must reduce electricity load, as far as is practical and furthermore, as Council electrify vehicles and heat sources, our demand for electricity will increase. Therefore, this increase must be mitigated so much as is possible by reducing our consumption in other areas.

As a responsible organisation, Ards & North Down Borough Council should therefore set our own targets in line with legislation, and not rely solely on the decarbonisation of the electricity network to achieve carbon savings on our behalf.

Ards and North Down Borough Council has already made several commitments to Sustainable Energy Management within the following high level strategic documents.

Roadmap to Sustainability

The Roadmap to Sustainability (“the roadmap”) was developed to formalise the Council’s commitment to becoming more sustainable. It covers the period 2021-2028 and is based around UN Sustainable Development Goals (UN SDGs) most relevant to Council operations.

The roadmap has several references and actions related to energy and carbon management, primarily within its Biosphere (Environment) Pillar section and related actions within the supporting action plan.

Examples from the action plan include:

- **Action 7-** which commits the Council to develop this Sustainable Energy Management Strategy and Action Plan.
- **Action 16-** which commits the Council to develop an overarching Climate Change Mitigation/ Carbon reduction Strategy. This Strategy and Action Plan supports this primarily for the Scope 1 & 2 emissions¹ element.

Corporate Plan – Towards a Sustainable Borough 2024-2028

The Corporate Plan’s vision is for the Council to work towards becoming a sustainable borough by focusing on three corporate priorities that align with the three pillars of sustainable development: economic, environmental, and social. The environmental priority is to reduce carbon emissions as we transition to net zero. In working towards net zero, recognition is given to the importance of biodiversity, natural ecosystems and creating communities resilient to the unavoidable impacts of

¹ Scope 1 & 2 carbon emissions are those related to the Council’s consumption of grid electricity, natural gas, DERV, gas oil and kerosene

climate change. Considerable emphasis is placed on reducing carbon emissions through energy reduction and technological advances.

The Corporate Plan contains an outcome, as well as strategic actions and measures of success to track progress towards achieving the aspirations:

- Outcome – We are an environmentally resilient Council and Borough meeting our net zero targets
- Strategic action – Developed and are implementing a fully funded plan to transition Council operations towards our long-term net zero carbon targets
- Strategic action – Promoting responsible behaviours that focus on reducing carbon emissions while enabling resilience to climate change.

Measures of success to track progress include agreeing a plan to transition to net zero, reducing our energy consumption through energy efficiency and increased our use of renewable sources.

Integrated Strategy for Tourism, Regeneration and Economic Development 2018 to 2030

This Strategy presents a coherent vision for the pursuit of prosperity in this Borough.

Within the Strategy, there is the following commitment relating to carbon reduction:

‘The Council will pursue an ambitious programme to reduce the carbon emissions resulting from its operations and encourage businesses and residents to reduce their emissions.’

Council’s Roadmap to Green Fleet

Although this document is currently in the process of being written, Council have agreed a general direction of travel as outlined within the “Alternate Fuel feasibility Study” commission by East Border Region group of Councils. This feasibility study determined that the most feasible alternate fuel for our smaller vehicles would be battery power and the most feasible alternate fuel for our larger vehicles would be hydrogen. As stated above this transition to electric vehicles will increase our consumption and so must be mitigated by savings elsewhere.

Council decisions

Key energy and carbon-related activity within Council operations and the wider Borough has been informed/led by the following decisions made by Elected Representatives during Council meetings.

1. Carbon Neutrality (November 2018)

‘That this council agrees that Climate Change is one of the biggest global challenges of our time, affirms that the council has an important leadership role in creating a low carbon future.’

2. Climate Emergency (February 2019)

‘That this council notes the recent IPCC report on the impacts of climate breakdown and agrees that drastic and far-reaching measures must be taken across society to try and mitigate the risks and declares a Climate Emergency.’

The Council became the first in Northern Ireland to declare such an emergency. It is this leadership which the Council wishes to adopt through this Strategy in its efforts to becoming an ‘exemplar’ organization in relation to energy and carbon management.

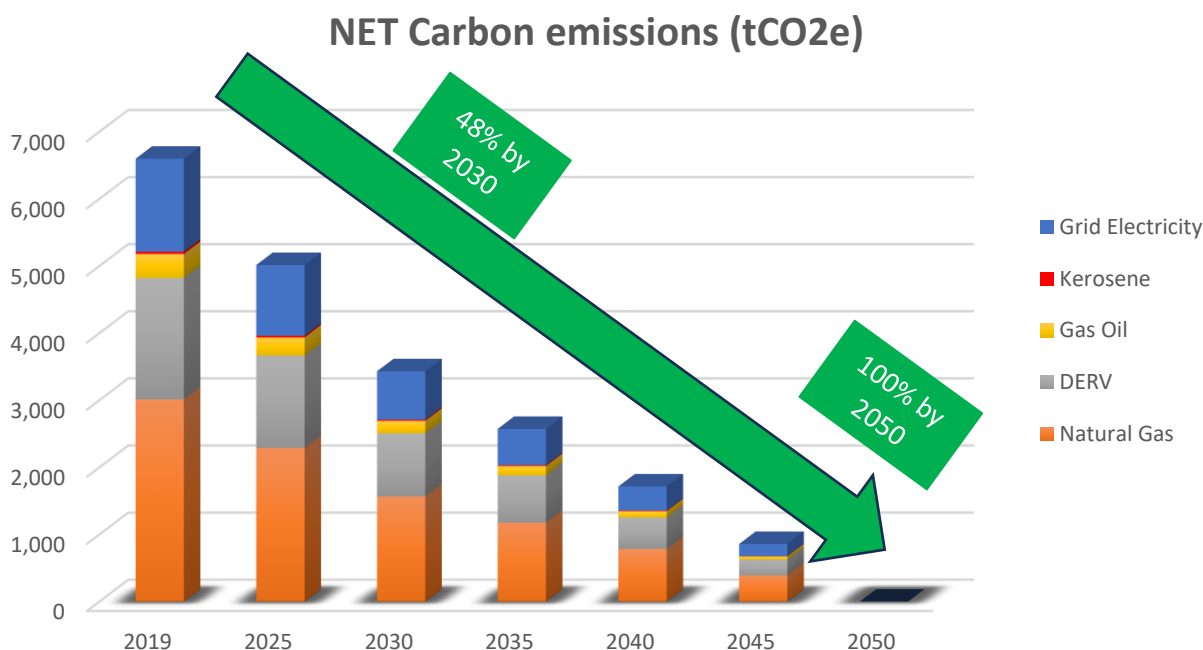
4 THE ROAD TO NET ZERO: THE CHALLENGE AHEAD

The Climate Change Act (Northern Ireland) 2022 (Act) sets a target of an at least 100% reduction in net zero greenhouse gas (GHG) emissions by 2050 (i.e, net zero emissions by 2050) for Northern Ireland compared to baseline, along with interim targets including an at least 48% reduction in net emissions by 2030.

The Act states that the baseline should use 1990 figures. However, all 11 Councils agreed that due to the challenges of accessing historical data, and the changing remit of Councils over the past 30 years, that 2019 was an appropriate baseline year from which to measure improvements.

By way of demonstrating the scale of the challenge ahead, the table below quantifies this Carbon reduction in terms of the costs (using current costs per unit for the purposes of this comparison).

Emissions Source	2019 Costs	2030 target costs (48% reduction)	Savings to be realised
Natural Gas	£819,136	£425,950	£393,185
DERV	£800,342	£416,178	£384,164
Gas Oil	£98,542	£51,242	£47,300
Kerosene	£9,438	£4,908	£4,530
Grid Electricity	£1,248,089	£649,006	£599,083
Total Costs	£2,975, 546	£1,547,284	£1,428,262

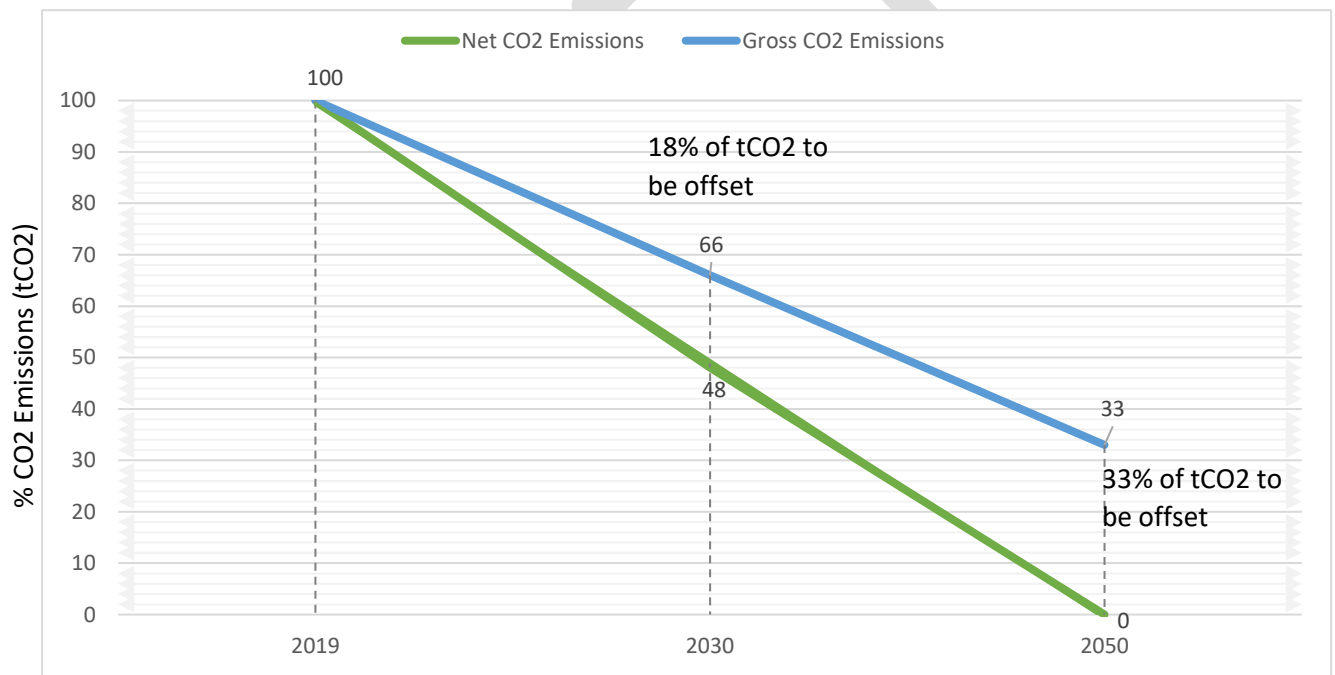


4.1 CARBON OFFSETTING

It is clear that despite implementing all possible measures, it is extremely unlikely that an organisation such as Ards and North Down Borough Council will have zero carbon emissions by 2050. For example, at present the technology simply doesn't exist to provide heat for our larger buildings without utilising fossil fuels. We therefore must look at Carbon Offsetting to achieve **NET** zero by 2050.

The exact gross CO₂ emissions, and by deduction, the amount of carbon to be offset in 2050 is unknown at this time but can be estimated based on what we currently know, as indicated in the graph below. This figure is based upon the implementation of the entirety of the attached action plan (using estimated implementation dates) and the factors associated with the transition to the electrification of vehicles and heat sources. These offset figures are likely to be conservative, and more offsetting will likely be required.

The steps within the Action plan attached to this document will realise savings of approximately 2,242 tons of CO₂. This represents a reduction of around 30% compared to our 2019 baseline, meaning a considerable amount of carbon will remain to be reduced or offset. As the deadlines imposed by the Climate Change Act grow closer, it is anticipated that Carbon reducing technology will become more advanced and more prevalent.



Despite this, Council will clearly need a robust plan in place to offset the shortfall. Several Carbon offset measures are explored within the Council's Tree and Woodland Strategy 2021-2032 and Local Biodiversity Action Plan (LBAP) including planting 15,000 trees per year, rewilding certain areas and managing peat bogs within the Borough. The Tree and Woodland Strategy will also include the provision for software that will facilitate the calculation of CO₂ absorption achieved via the various measures implemented. This data will be used to inform our Carbon offset value and which is critical to demonstrate that net zero has been achieved. The new software will also supply the Council with tree data such as pollution removal and avoiding stormwater run-off.

By 2030 it is expected that both Council's long term carbon reduction measures, and the carbon offset value will be calculated, enabling any indicated net shortfall to be addressed prior to 2050.

5 STRATEGY AIMS / THEMES

This section summarises the key strategic themes upon which the Council's focus will be concentrated to optimise consumption, reduce costs, and carbon emissions.

The key areas where energy efficiency and carbon emissions reduction will be focussed include:

- Enabling measures and initiatives, first and foremost, related to:
 - effective governance and oversight arrangements for energy management; and
 - appropriate resourcing (human and financial) of energy management.
- The Council's 'estates Strategy,' via sustainable new build, major refurbishment, and space rationalisation, including the potential closure of less efficient buildings and spaces to improve the overall energy and carbon efficiency of the Council's Physical estate.
- The ongoing delivery and development of a structured sustainability awareness and communications programme with a key aim of creating a positive energy and carbon culture within Council staff, elected representatives, and the wider Borough stakeholders (i.e. its residents and business community).
- The development of sustainable, flexible working policies and arrangements to reduce the size of the Physical estate to optimise space use and reduce unnecessary building energy consumption.
- The introduction of more sustainable, zero and/ or low carbon, energy efficient technologies to:
 - replace existing inefficient and/ or aged plant, equipment and building systems.
 - reduce dependency on grid electricity and fossil fuels.
- Improvements to building fabric and building management system controls.
- Enhanced metering of the Council utility supplies to reduce wastage/ optimise consumption; and
- Continual review and update of related policies/ procedures/ strategies and reporting structures to ensure that energy and carbon management is regarded as an integral part of the Council's wider business planning and operations arrangements.

5.1 ENABLING THEMES

5.1.1 Improved Governance, Accountability and Oversight of Energy Management within the Council

In order to ensure this Strategy and accompanying Action Plan's suitability and effective implementation, the Council will enhance existing energy management governance arrangements. Enhancements to support this Strategy will be introduced in the following areas:

5.1.1.1 Publication of the Strategy/Plan

In the interests of transparency and openness, this Strategy and supporting Action Plan will be publicly available via externally accessible web pages. In addition, an annual energy and carbon performance report will be published outlining key energy management work undertaken, progress against targets and year on year performance.

5.1.1.2 Energy Management as a Strategic Priority

This Strategy outlines the strategic importance that the Council places on energy and carbon management and is being produced in support of the Council's wider **Roadmap to Sustainability and Corporate Plan**.

This strategic importance should in turn encourage the integration of effective energy management throughout Council operations, which will result in improved energy performance, cost avoidance/reduction and associated carbon emissions reduction.

The Council will endeavour to ensure that all future strategies, policies, and procedures are aligned to this Strategy where relevant.

5.1.1.3 Key Roles & Responsibilities

A summary of the key roles and responsibilities for energy and carbon management within the Council is as follows. It is critical for the success for this Strategy that all those groups and individual post holders mentioned are made aware of the key role they play, and the subsequent expectations placed on them.

CHIEF EXECUTIVE

The Chief Executive is responsible for the executive management of the Council and its day-to-day direction. As a result, the postholder is ultimately responsible for the delivery of the Council's strategic and operational plans.

This Sustainable Energy Strategy is a key strategic plan which will contribute to the Council's wider sustainability agenda.

Energy management must be a key consideration within the Council's decision-making processes particularly in areas including development and refurbishment of the Council estate, stakeholder engagement, procurement of goods and services and flexible working arrangements.

The Chief Executive will ultimately be accountable for the successful implementation of this Strategy.

DIRECTORS

As the senior management overseeing the day-to-day activities of the Council's Directorates, Directors are responsible for promoting effective energy and carbon management practices within their respective areas, ensuring that energy management is a key consideration. This, in turn, supports the successful implementation of this Strategy.

Directors will act as a challenge function within and across directorates to ensure that energy management is an important factor within Directorate-wide planning and decision making.

HEADS OF SERVICE

Heads of Service are the link between the strategic Directors and the operational staff. Their role is therefore crucial in ensuring that the strategic aspirations of the Council become reality. The Service Planning process should reflect the content of this Strategic Plan and cross-service collaboration on relevant matters should be implemented to ensure consistency.

CLIMATE CHANGE AND SUSTAINABILITY CHAMPIONS WORKING GROUP

The Council has established a Climate Change and Sustainability Champions Working Group whose aim is to support the council in its declaration of a Climate Emergency and its commitment to net zero carbon.

Its key objectives are to:

- Enable collaborative working within the Council in the first instance
- Source relevant and necessary budget to facilitate the group
- to engage with relevant individuals, community groups, external stakeholders, businesses, and other partners to ensure a consistent and pro-active approach to climate action throughout the Borough
- To ensure the actions relevant to Climate Action within the Roadmap to Sustainability are implemented
- Identify best practice and relevant benchmarking standards
- To develop clear targets for net zero

The Group will monitor the delivery of the actions within this Strategy. The Group will also receive regular updates on energy performance and provide a vital challenge function on the progress of the Action Plan. This will ensure cross-council collaborative working. Any relevant actions arising will be taken to the appropriate Committee.

The Working Group is chaired by the Compliance Officer - Sustainability, who as Chair, will raise the profile of energy and carbon management within the Council and promote key targets and actions.

COUNCIL STAFF

Council staff have a particularly important role to play, individually and collectively, in optimising energy consumption and reducing carbon emissions. It is they who use equipment, purchase goods etc. so they should be aware of the positive impact they can have on the successful implementation of the Plan.

All staff must take ownership of the equipment and facilities they use and the decisions they make which can have an impact on energy use.

All staff will receive compulsory Sustainability and Climate Change Awareness training, including energy and carbon management as a key consideration.

Sustainability Champions have also been appointed who act as 'leads' on sustainability across all service areas. Their role is to sense-check and challenge where energy and carbon management should be considered.

ASSETS AND PROPERTY SERVICES

The Assets & Property Services section within the Council's Environment Directorate will play a key role in the successful implementation of this Strategy. The Section is responsible for making upgrades to the physical estate to improve energy efficiency within the following areas:

- oversight of the construction of "minor works" schemes, and refurbishment of existing buildings.
- oversight of improvements to building fabric, plant, equipment, controls, and monitoring systems to enhance the efficient use of energy; and
- installation of low and zero carbon technologies (Solar PV, wind turbine generators, CHP. units etc.) as part of refurbishment and new build activities.

Ultimately, it is the responsibility of the Head of Assets & Property Services to ensure the Action Plan section of this Strategy is implemented, and this objective is included in the Service Plan for 2024-25.

STRATEGIC CAPITAL DEVELOPMENT

This Section is responsible for the delivery of the Council's larger capital projects and therefore plays a significant role in the long-term sustainability of our estate. This Section is currently working on an office rationalisation project that aims to consolidate numerous office buildings into one main building, thereby achieving significant savings and benefits.

Furthermore, the Section is currently developing a **Capital Projects Sustainability Policy**. The draft policy makes several recommendations:

1. That council introduces the principles of BREEAM, an internationally recognised measure and mark of sustainable qualities, to all strategic capital projects. Where appropriate and possible all projects to achieve a BREEAM 'Outstanding' rating and where appropriate register the project with the Building Research Establishment (BRE) for certification.
2. That Council uses the principles within the BREEAM process to assist all capital projects to ensure sustainability is considered and incorporated, even when it is deemed appropriate not to register the project with the BRE, seek certification and or not possible for the project to adhere to the principles in full.
3. That Council continues to work with external funders, the majority of whom require BREEAM Outstanding as part of their funding criteria.
4. That Council acknowledges that not only is this a way of ensuring compliance with legislation, but it will have long lasting efficiencies benefits with regards to whole life cycle costs

It should be noted that the policy is currently in draft form and is therefore subject to change.

5.1.2 Improve resource availability for energy management**5.1.2.1 Human Resource- dedicated energy professional(s)**

Responsibility for energy management currently resides within the Environment Directorate's Assets & Property Services Section.

The Council now appreciates that the allocation of human resources to energy management was stretched in general and would not have delivered its energy management aspirations, particularly in becoming an exemplar institution.

With this in mind, the Council has appointed a full-time Energy Efficiency Officer who co-ordinates energy management improvements across the Council estate. This Officer will be a key support for the implementation of this Strategy and supporting Action Plan. They will also assist with the sharing of good practice on sustainable energy management to the Borough's residential and business communities.

This structure and the appointment of a full-time resource will allow more focus and effort in proactive energy and carbon management.

5.1.2.2 Financial resource- dedicated funding for a programme of prioritised energy improvement and carbon reduction initiatives

Considerable financial investment will be needed to implement the identified actions and subsequent projects.

Funding will continue to be required for year-on-year energy and carbon reduction initiatives. Many of these initiatives will be 'invest to save' for the longer term, and as such will have a direct payback through reduced energy bills.

Given the current elevated increase in energy prices, it is vital that the Council acts without delay in reducing dependency on fossil fuels and grid electricity.

With this in mind, Officers recently amended the Council's **Property Maintenance Strategy** to include a sum of £150k per year for "Energy Saving Initiatives"

The Council will use this fund to 'invest to save' in areas including:

- New build and refurbishment
- Minor works upgrades e.g. lighting, glazing, insulation, improved controls
- Energy monitoring and targeting
- Awareness and communications
- Low and zero carbon technologies
- Building management controls and systems

Whilst this fund will go some way to improving the efficiency of the smaller buildings within our estate, separate capital revenues for larger scale projects will undoubtedly also be required in the near future.

5.1.2.3 Dedicated energy management funding

The review identified that there has been investment in energy efficiency upgrades within the Council estate such as LED lighting and controls, boiler replacements and zero and low carbon technologies such as the installation of Solar PV, a wind turbine generator and CHP units.

The review also identified several opportunities to upgrade existing systems, plant and equipment and fittings in buildings. These have been included within the Action Plan, attached as Appendix 1.

The Council wishes to be regarded as an exemplar organisation with regards to energy and carbon management; consequently, it will investigate how it can introduce a dedicated energy improvement fund to drive energy optimisation and carbon reduction.

There are several examples of organisations who have introduced dedicated ring-fenced funds for such purposes.

Some of these funds have been set up so that they are sustainable and longer term, through having a mechanism where cost savings from the projects implemented are used to 'top up' the fund for further reinvestment. The Council will also investigate how a self-sufficient fund might be set up and established.

Council has already allocated £770k over the next two years for such initiatives and will consider requests for further funding in the next estimates budgeting cycle. In addition, Council has established three strategic funds, one of which is focussed on sustainability. This was set up in order to provide funding to pump-prime initiatives to address a range of sustainability issues including energy reduction and management. It is intended to review the Reserves Policy during the current year and also develop a strategy in respect of how to grow the Council's strategic funds.

5.2 ESTATES STRATEGY

It has been estimated that building stock accounts for approximately 50% of all carbon emissions in the UK. As such, it is the single biggest contributor to the emissions of non-industrial/ transport-based organisations.

The Council, through its capital new build and refurbishment programmes, will be enhancing the specifications for such works going forward in terms of energy and carbon performance.

Specifically, the Council will induce minimum performance standards for major refurbishment and new build projects which align with best practice standards such as BREEAM, as noted in the Council's draft Capital Projects Sustainability policy reference in section 4.1.1.3.

This will lead to the construction and refurbishment of more efficient buildings with lower carbon emissions, which will vastly exceed current building regulations requirements.

Another key area within the Council's estate development will be the rationalisation of existing space.

The Council is currently reviewing working arrangements for staff which may reduce the amount of office space required and result in the disposal/repurposing of some Council buildings.

As part of this review of working arrangements, the Environment Directorate will continue to engage with the process, advising on strategic decisions in relation to office accommodation.

The Council will work to prioritise the disposal/repurposing of less efficient buildings and office space within buildings and focus on flexible working space in more efficient buildings.

As this review of working arrangements continues, the Council will refrain from significant energy improvement investment in buildings which have the potential for closure in the near future.

The Council is in the process of developing its "Roadmap to Green Fleet" document. The agreed outline for this document suggests that battery power will be utilised for its smaller vehicles and hydrogen for its larger vehicles. The generation, storage, and distribution of both these fuel types will have a significant impact on our depots, where Council's 200+ vehicles are based. A full review of the suitability of our depots will therefore be required as part of any feasibility study.

5.2.1 Stakeholder Engagement in Energy and Carbon Management

As detailed in the **Roadmap to Sustainability**, the Council is developing a sustainability communications programme amongst staff, elected members, visitors, residents, and businesses.

Key content within this programme will include energy conservation, carbon emissions and climate change awareness.

Engaging staff, visitors, residents, business owners and elected members in effective energy and carbon management will give them a better understanding of their individual respective environmental impact and the positive actions they can take to minimise this impact. This will encourage a sense of ownership amongst our stakeholders with the cumulative benefits of reduced energy use and lower carbon emissions through the adoption of more positive, environmentally sound choices and behaviours.

5.3 ZERO AND LOW CARBON TECHNOLOGIES

5.3.1 Renewable electricity generation

The Council has in place some small scale Photovoltaic (PV) generation installations in addition to a large wind turbine generator installed adjacent to its Balloo Household Recycling Centre site.

Both technologies are mature, qualify for government subsidies, provide significant carbon, and cost savings where the generated electricity is utilised on site. The Council will therefore look to expand the use of renewable electricity generation wherever practical to do so. All renewables will be considered including ground source, air source and tidal generation, where appropriate.

5.3.2 Low carbon heat

The Council will review the potential to replace older heating systems, particularly those fuelled by kerosene, with lower carbon fuel sources.

The Council is keen to install further low and zero carbon technologies across its estate to reduce its dependency on grid electricity and fossil fuels.

We will continue to closely monitor technological advances, alternative fuel types and the availability of grant support for the installation of such technologies and the use of low carbon fuels.

5.3.3 Technology Solutions

The Council will continue to evaluate the feasibility of introducing more sustainable energy technologies, controls, and systems across the estate.

The Council will also enhance its existing life-cycle cost assessment in such technology considerations, including carbon saving potential.

Examples of technologies to be considered include:

5.3.4 Lighting technology

Lighting within buildings accounts on average for 30% of electricity consumption.

In reviewing opportunities for improvement, the Council will continue to consider the following key lighting technologies:

5.3.4.1 LED Lighting

LED lighting technology is a cost-effective option for the refurbishment of existing lighting arrangements. It can typically provide a 20-30% reduction in power consumption and associated carbon emissions compared with modern fluorescent or metal halide light fittings.

The technology also has the benefit of longer hours of use, thereby reducing replacement, recycling, and maintenance costs.

The Council has already introduced LED lighting within its estate, with the independent review identifying further opportunities to achieve consumption reduction and other wider benefits. These are highlighted within this Strategy's Action Plan.

5.3.4.2 Automatic Lighting Controls

The Council has already introduced automatic lighting controls e.g. PIRs (Passive InfraRed sensor) Photocells across its estate.

Lighting controls will continue to be installed as buildings and outside spaces are upgraded and developed.

5.3.5 Building Management Systems

Building Management Systems are critical pieces of equipment for controlling energy use. They are computer-based systems used to monitor and control building services such as lighting and heating, ventilation, and air conditioning systems.

The review identified opportunities to improve the management of such installed systems, which in turn would lead to energy reduction. These opportunities have been included within the Action Plan.

5.3.6 Monitoring & Targeting

The Council will make improvements to its existing monitoring of energy consumption, which will be a key responsibility for the additional dedicated resource for energy management being introduced.

Currently, the only readily available information the Council has is consumption information via utilities invoices, with the best data frequency interval available being monthly consumption.

This monthly frequency does not allow the Council to proactively monitor consumption to identify trends e.g. out of hours consumption, and consequently hinders the identification of opportunities to reduce consumption.

The Council will strengthen its existing invoice validation process to enhance interrogation of consumption and costs so that any anomalies, including potential instances of overconsumption, can be identified, and addressed in a timely manner.

5.3.6.1 Automatic Monitoring & Targeting (aM&T)

Proactive monitoring and targeting of energy consumption is a vital component of any organisation's energy management efforts.

Automatic monitoring and targeting is an excellent tool which allows an organisation to monitor consumption more closely e.g. on a half hourly basis. The technology in itself does not save energy, rather it enables an organisation to:

- identify ways to reduce energy costs;
- pinpoint energy wastage;
- be made aware of instances of abnormally high energy consumption; and
- put in place robust and long-term energy management practices.

The technology takes the information from utilities meters and brings it back into a platform which logs data such as consumption and load. The programme can then be used to profile consumption trends and/or set up alarms which can alert programme users where high consumption is occurring.

It is estimated that this technology can help organisations identify energy savings of 4 – 20% or more, with average cost savings of 10-15% provided the technology installed is appropriately set up and utilised.

The Council will explore the installation of aM&T systems for targeted higher energy consuming buildings.

5.4 FLEET MANAGEMENT

The Council consumes significant quantities of DERV (Diesel Engine Road Vehicle, also known as white diesel or road diesel) in the completion of its everyday activities and support to the Borough's residents and organisations.

The Council is actively working to reduce its dependency on DERV as it is a carbon intensive fossil fuel. It has completed the following trials on its Refuse Collection Vehicles (RCVs):

- the retrofitting of solar panels to provide renewable power to the RCVs ancillary equipment;
- the use of Hydrotreated Vegetable Oil (HVO) as a sustainable fuel replacement for RCVs; and

- the use of driver behaviour software to monitor and prompt drivers to ensure that they drive vehicles to their optimum performance which in turn will improve fuel efficiency.

As noted in section 4.2 the Council is in the process of developing its “Roadmap to Green Fleet” document. The agreed outline for this document suggests that battery power will be utilised for its smaller vehicles and hydrogen for its larger vehicles. The generation, storage, and distribution of both these fuel types will have a significant impact on our depots, where Council's 200+ vehicles are based. A full review of the suitability of our depots will therefore be required as part of any feasibility study.

DRAFT

6 CONCLUSION

This Strategy and Action Plan sets out the Council's commitment to effective energy and carbon management.

The Council wishes to become an exemplar organisation and as such, it recognises the challenge ahead and the need to fundamentally enhance existing arrangements, particularly around governance, oversight and reporting and the allocation of dedicated human and financial resources.

The Council was the first in Northern Ireland to declare a Climate Emergency. This Strategy will go some way to allowing this declaration to be actioned at a more accelerated rate through innovative and ambitious improvement initiatives.

For this Strategy to be successfully implemented it is critical that energy and carbon management is regarded as a key strategic priority across the Council. This is crucial for the following reasons:

1. The environmental impact of Council's operations upon natural resource depletion and the generation of carbon emissions, contributing to climate change.
2. The associated energy costs for grid electricity and fossil fuel supply and use.
3. As a responsible organisation, the need to demonstrate best practice in energy management to its key stakeholders, which in turn should influence the adoption of related positive behaviours and actions in the residential and commercial sectors.

All Directorates must engage fully with the implementation of this Strategy, and energy management within the Council will not be regarded as the sole responsibility of one individual or part of the organisation. Whilst the Assets and Property Section within the Environment Directorate will play a key role in leading and co-ordinating the implementation of the Strategy and Action Plan, energy management will be a key consideration within the policy planning and operational delivery processes of every Section and Directorate on an ongoing, continuous basis.

See separate document

DRAFT

APPENDIX 2 ANNUAL ENERGY CONSUMPTION AND CARBON EMISSIONS OVERVIEW

The following tables and charts provide a summary of the Council's annual consumption and carbon emissions for the year 2019-2020².

Emissions sources (listed below) have been reviewed to collate/ calculate the consumption, costs, and carbon emissions:

- Grid electricity
- Natural Gas
- DERV/ white dies
- Gas oil/ red diesel
- Kerosene/ heating oil

Council operated buildings and facilities

Source		Consumption	Unit of measurement	Costs ³	Carbon factor (CO ₂ e/ unit)	Carbon emissions (tonnes)
Electric	Total Grid	4,035,520	kWh	678,485	0.18385	1031.38
Natural Gas		7,729,967	kWh	473,304	0.25560	1421.15
DERV		672,556	litres	823,095	2.6897	1,808.97
Gas Oil		129,661	litres	86,354	2.7821	357.63
Kerosene		12,981	litres	5,867	2.54042	32.98
Total Carbon emissions (CO₂e)			tonnes			4,652.11

Serco operated buildings and facilities⁴

Source	Consumption	Unit of measurement	Carbon emissions factor (kgCO ₂ e/ unit)	Carbon emissions (tonnes CO ₂ e)
Grid electricity	1,390,954	kWh	0.2556	355.53
Natural Gas	8,652,743	kWh	0.18385	1,590.81
Kerosene	2,000	litres	2.54042	5.08
Total Carbon emissions		tonnes		1,951.42

² For the period April 2019 to March 2020

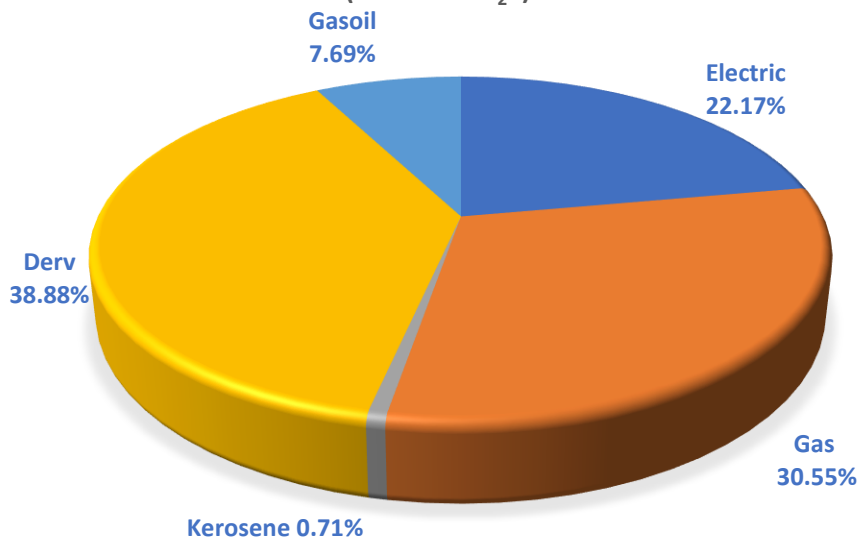
³ Costs are inclusive of VAT. Assumes costs presented for DERV, Gas Oil and Kerosene are inclusive of VAT.

⁴ Data presented is for the following Serco operated facilities- Aurora Leisure Centre, Queen's Leisure Centre, Spafield Pavilion and Bangor Sportsplex.

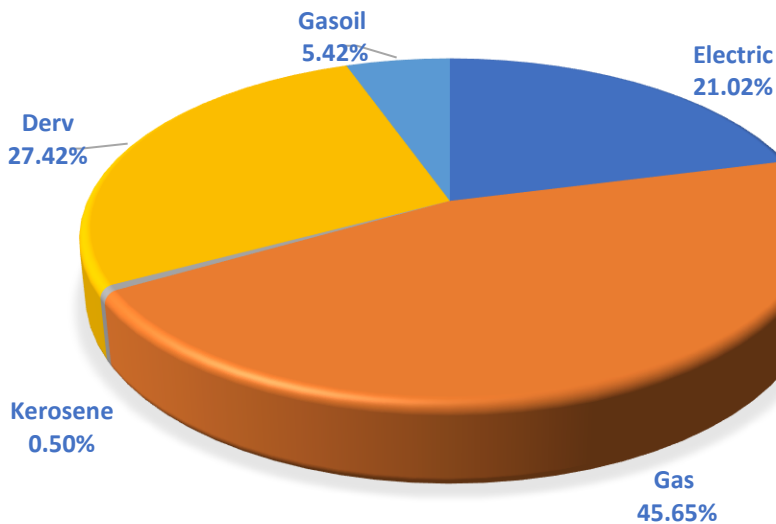
Combined carbon emissions (Serco and Council operated)

Emissions Source	Consumption	Unit of measurement	Emissions Scope	Carbon emissions (tCO ₂ e)
Natural Gas	16,382,710	kWh	1	3,011.96
DERV	672,556	litres	1	1,808.97
Gas Oil	129,661	litres	1	357.63
Kerosene	14,581	litres	1	32.98
Grid Electricity	5,426,474	kWh	2	1,386.91
Total carbon emissions		tonnes	1 & 2	6,598.45

CARBON EMISSIONS (TONNES CO₂E) - COUNCIL OPERATED



CARBON EMISSIONS (TONNES CO₂E) - COUNCIL AND SERCO OPERATED



Appendix 1

Ards and North Down Borough Council Sustainable Energy Management Strategy

ACTION PLAN

This action plan has been divided into the following sections/ themes:

1. Enabling Actions
2. Generic/ Behavioural Actions; and
3. Building Specific Actions

This action plan shall be for a three-year period, after which a revised action plan will be developed with further details.

It is envisaged that the follow up action plan will include more specific actions in terms of buildings and systems improvements i.e. after the actions within this plan related to further detailed surveys and feasibility studies are completed.

This initial action plan focuses on getting the systems, governance, and oversight arrangements in place within the Council to ensure effective sustainable energy management, with some specific actions also included which were identified during the high-level energy surveys.

Further update reports will include costs and timescales for the actions.

The actions presented within each of these sections/ themes are in order of priority and benefit in terms of consumption and carbon emissions reduction potential.

The actions are also classified as follows:

1. Urgent- within 6-9 months of the Actions Plan being endorsed.
2. Short Term- within 12 months
3. Medium Term- -within 24- 36 months

The Action Plan will be subject to annual review. A Progress Report shall be prepared, presented, and approved by Environment Committee.

Enabling Actions

Theme	Priority/ Lead Responsibility	Action	Rationale/ Notes	Benefit
Enhanced Energy Management Governance	Urgent Head of Assets & Property Services Director of Environment	Improve governance arrangements to ensure that energy management has effective oversight and accountability within the Council.	Improving oversight and accountability within the Council for energy management will ensure that consumption performance and the implementation of the Strategy and this action plan will be continuously monitored. Energy Management should be a standing agenda item to allow it to be regularly reviewed through the Council's 'Climate Change Working Group.'	Improved monitoring and governance will improve energy performance by ensuring actions are effectively implemented, consumption trends routinely monitored, which should result in reduced consumption, costs, and emissions.
Formal Energy and Carbon Management Policy	Urgent Director Of Environment	Develop a formal policy for the Council to include a requirement for space heating to be switched off during a predetermined period during the summer.	Having a formal approved policy will support energy and carbon management efforts as well as demonstrate the Council's commitment to reducing energy consumption and carbon emissions.	Enhanced Reputation (the Policy should be made publicly available) Should support efforts/ actions to reduce consumption, costs, and emissions.
Energy check/ audit programme	Urgent Director of Environment	Introduce an energy check/ audit programme to introduce a structured review process for energy and carbon management in prioritised buildings.	Having a programme where energy checks/ audits are completed will proactively monitor performance. Key areas to review during these checks/ audits include: <ul style="list-style-type: none"> ○ Time and temperature set points on heating controls and building management systems (e.g. AHUs, boiler heating timers etc.) ○ Lighting and equipment left on unnecessarily. ○ Out of hours consumption (where aM&T systems have been installed or where half hourly electricity data is available. 	Reduced energy consumption and costs A thorough, robust, proactive audit programme has the potential to realise considerable savings in consumption, costs, and emissions. Estimated realistic savings of between 3-5% of energy costs.

Savings	Cost	Carbon
3%	£62k	124T
5%	£104k	207T

<p>Energy and Carbon Awareness</p>	<p>Short term</p> <p>Director of Environment</p> <p>Director of Corporate Services Development and Administration</p>	<p>Development and roll out of an energy and carbon awareness campaign to promote energy efficiency and carbon emissions reduction. Key content could include:</p> <ul style="list-style-type: none"> ○ Lighting and equipment switch off messaging. ○ Heating set points ○ Other key behavioural messages <p>The campaign should be designed and delivered to the following:</p> <ul style="list-style-type: none"> ○ All staff, via generic sessions ○ Focussed sessions and materials for prioritised staff/ buildings i.e. those with high consumption e.g. leisure centres. <p>This should be completed to complement the Council's existing Sustainability Communications Programme</p>	<p>Employee engagement in energy efficiency and carbon reduction has many benefits:</p> <ul style="list-style-type: none"> ○ Energy savings: Saving energy saves money and reduces an organisation's carbon footprint. ○ Employee satisfaction: participation in employee engagement schemes can make employees feel valued. Knowing that their organisation cares about sustainability can improve employee satisfaction and employee retention. ○ Reputation: an employee engagement/ awareness scheme around sustainability shows that an organisation cares about both its employees and the environment. This can improve an organisation's reputation and improve employee attraction. <p>The campaign should comprise information/ training sessions as well as the design and display of awareness messages e.g. posters/ signage with equipment and lighting switch off when not in use.</p> <p>Whilst the priority should be in higher consuming buildings, the messaging should be displayed throughout the Council Estate.</p>	<p>A well implemented employee engagement scheme can lead to energy savings of approximately 5-10%.</p> <table border="1" data-bbox="1675 341 1912 432"> <thead> <tr> <th>Savings</th> <th>Carbon</th> </tr> </thead> <tbody> <tr> <td>5%</td> <td>207T</td> </tr> <tr> <td>10%</td> <td>414T</td> </tr> </tbody> </table> <p>It could also lead to:</p> <ul style="list-style-type: none"> ○ Employee satisfaction ○ Council reputation <p>The campaign would also support the related commitments and actions within the Council's wider 'Corporate Plan' and 'Roadmap to Sustainability'</p>	Savings	Carbon	5%	207T	10%	414T
Savings	Carbon									
5%	207T									
10%	414T									

DRAFT FOR COMMENT

Generic/ Behavioural Actions

Theme	Priority/ Responsibility	Action	Rationale/ Notes	Benefit
Sustainable energy design	Urgent Director of Place plus Head of Strategic Capital Unit	Develop a Capital Projects Sustainability Policy to be agreed by Council	<p>Consideration, in particular, should be given to the introduction of specifications which should include the following key criteria, subject to business cases:</p> <ul style="list-style-type: none"> ○ Zero/ Low carbon technologies ○ Effective zoning e.g. of heating and lighting systems ○ Energy and carbon performance targets e.g. as set out in the BREEAM performance standard. ○ Effective commissioning of key plant and equipment e.g. AHUs, low carbon/ renewable technologies ○ Installation of efficient equipment, fittings, and controls e.g. boiler upgrades, LED lighting, PIR and daylight sensors, smart heating programmers, variable speed drives (VSDs) on pumps etc. <p>Building sustainable structures not only reduces their environmental impact but also offers economic advantages.</p> <p>Sustainable buildings are more efficient and cost less to operate than conventionally built buildings.</p>	<p>Enhanced Corporate Reputation</p> <p>Consumption and carbon emissions reduction and cost savings.</p> <p>Although the upfront costs can be higher for more sustainable new builds and refurbishments, a newly built green asset has been found to have 14% lower operational costs over five years when compared to a conventionally designed and constructed building (World Green Building Council).¹</p> <p>In addition, the briefing paper 'Assessing carbon emissions in BREEAM' published in 2016 demonstrated that the average CO2 savings for a BREEAM assessed building is 22%, whilst a BREEAM Excellent building is expected to reduce carbon emissions by 33% when compared to conventional builds.</p>
Existing/ historic energy improvement quotations	Urgent Director of Environment	Complete an exercise to gather all energy efficiency related upgrade quotations e.g. LED lighting upgrades,	During the completion of the review and auditing project, it was advised that quotes had been received in the past which were not taken forward.	Consumption and carbon emissions reduction and cost savings should projects be implemented.

¹ <https://bregroup.com/breeam-news/six-ways-to-get-the-most-out-of-breeam/>

		<p>which should then be reviewed with those deemed beneficial taken forward.</p>	<p>Such quotes received would include estimated cost savings and payback. Reviewing these and revisiting them where the projects are deemed feasible will result in consumption and cost savings.</p> <p>LEDs are more energy efficient than traditional halogen bulbs. They also last five times longer and use 80% less energy to produce the same amount of light. (Energy Saving Trust)</p>	<p>Considering that lighting can contribute to a third of a building's overall electricity consumption, transitioning to LED lighting is a swift and budget-friendly method to cut costs.</p> <p>For example, a traditional 600x600 4x18w fluorescent fitting, when swapped with a 600x600 30w LED panel, can reduce the related electricity consumption by approximately 55%.</p> <p>In many applications, the volume of fittings in-situ can multiply these savings even further.</p> <p>Adding lighting controls, such as dimming, and PIR sensors can also increase these savings further.</p>
<p>Improve energy and carbon performance reporting</p>	<p>Urgent Director of Environment</p>	<p>Improve availability of energy consumption and carbon emissions information to high consuming building managers e.g. Leisure Centres</p> <p>Improve reporting of energy and carbon performance through the Climate Change Working Group</p>	<p>Examples of information which could be provided include:</p> <ul style="list-style-type: none"> • Monthly reports on consumption and cost • Updates on work being completed e.g. related to actions contained within the action plan 	<p>This should promote and complement energy awareness in the Leisure Centres and a sense of ownership to assist with energy management.</p> <p>Improved high level oversight of energy and carbon management through the Climate Change Working Group should increase the likelihood of energy improvements being realised.</p>

Building insulation	Short term Director of Environment	Complete detailed building insulation reviews to identify opportunities to upgrade to improve efficiency	<p>During construction, Council policy has been to typically to install insulation to meet but not exceed, the levels stipulated by the Building Control regulations at that time. These levels have varied over time and older buildings often suffer from inadequate insulation by modern standards. There therefore may be significant opportunities to complete insulation upgrades across the Council to reduce heat loss and improve energy efficiency.</p> <p>Works and reviews should focus in on older buildings and those with higher heating related energy consumption. Improvements to insulation levels in buildings will also increase the potential to lower temperature set points in heating boilers due to the reduction in heat loss from those buildings.</p>	<p>Reduced heating related energy consumption, costs, and carbon emissions.</p> <p>Estimated savings of 10% across 30% of the Council's Estate/ Building Stock heating costs (Natural Gas & Kerosene).</p> <p>Savings</p> <ul style="list-style-type: none"> • Costs £64.5k • Carbon 255 tonnes
Space Planning/Rationalisation	Short term Corporate Leadership Team	Develop an effective space rationalisation regime to complement existing work on flexible working arrangements.	<p>Rationalisation of office and other Council space should be prioritised where possible to poorer energy performing buildings.</p> <p>Energy efficiency of existing building stock should be a key consideration for any space rationalisation efforts.</p> <p>No energy efficiency expenditure should be completed on buildings/ areas identified for closure (including those 'at risk')</p>	Closing down inefficient buildings/ areas will result in low-cost reduction in energy-related running costs, reducing consumption and carbon emissions
Automatic Monitoring & Targeting (a M&T)	Medium term (Short term for the trial installation)	Install aM&T systems in prioritised buildings on key energy supply meters to monitor consumption closely	<p>aM&T is a key tool to proactively monitor and manage energy consumption.</p> <p>Having aM&T systems available will vastly improve the Council's energy management efforts through</p>	It is estimated that this technology can help identify energy savings of 4 – 20% or more, with average cost savings of 10-15% being typically realised.

	<p>Director of Environment</p>	<p>and proactively on a regular basis in targeted buildings.</p>	<p>the timely identification of abnormal consumption patterns allowing them to be investigated and addressed quicker, resulting in reducing unnecessary consumption and costs.</p> <p>It is recommended that such a system is installed in one trial building to assess suitability e.g. on the main incoming energy supplies in one of the leisure centres.</p> <p>Linked to the need for dedicated energy management staff/ resource, aM&T systems are effective tools but only where there is enough time for them to be interrogated on a regular basis.</p> <p>aM&T systems can be purchased outright or can be installed as part of a monthly management arrangement with a specialist consultant who install the system and monitor it on a client's behalf.</p>	<p>For the Council Estate, estimated carbon reduction would be on the lower side of the typical savings (estimated as 5%-10%) primarily due to the variance in the Estate's building stock.</p> <table border="1" data-bbox="1646 453 1883 547"> <thead> <tr> <th>Savings</th> <th>Carbon</th> </tr> </thead> <tbody> <tr> <td>5%</td> <td>207T</td> </tr> <tr> <td>10%</td> <td>414T</td> </tr> </tbody> </table>	Savings	Carbon	5%	207T	10%	414T
Savings	Carbon									
5%	207T									
10%	414T									
<p>Wind Turbine Generator feasibility study</p>	<p>Medium term Director of Environment</p>	<p>Complete an options appraisal/ feasibility study on the potential to install wind turbine generators at Council sites.</p>	<p>A specialist consultant should be engaged with knowledge of planning implications to complete such an appraisal/ study.</p>	<p>Increased use of renewable electricity, resulting in reduced grid dependency, cost reduction and carbon emissions reduction</p>						

DRAFT FOR COMMENT

Building Specific Actions

Note: buildings referenced in the Action column are presented in order of focus/ priority)

Theme	Priority/ Lead Responsibility	Action	Rationale/ Notes	Benefit
Building Management Systems	Urgent Director of Environment	Complete detailed BMS reviews at the following locations with focus on energy efficiency to assess potential to reduce consumption through time settings, temperature settings, the installation of additional controls etc. <ul style="list-style-type: none"> ○ Ards Blair Mayne Leisure Centre ○ Bangor Sportsplex ○ Comber Leisure Centre ○ Town Hall, The Castle ○ North Road Depot 	High level reviews of existing BMSs in the locations identified have the potential to reduce energy consumption considerably. By way of example, it was noted that the Air Handling Units (AHU's) associated with the main pool area at Ards Blair Mayne were running 24 hours per day. There is an opportunity here to reduce these 'out of hours' i.e. when the facility is closed, and the pool cover is on. Similarly, there would also be potential to ramp back on the pool recirculation pumps 'out of hours'. The completion of more focussed BMS audits/ reviews are likely to identify more opportunities to reduce consumption, costs, and emissions.	Consumption, cost, and emissions reduction.
Boiler temperature settings	Short term Director of Environment	Complete exercises at each of the following locations to optimise the temperature settings on the heating to maximise the efficiency of the condensing boilers: <ul style="list-style-type: none"> ○ Comber Leisure Centre ○ Queen's Leisure Complex ○ Donaghadee Community Centre ○ Kilcooley Community Centre ○ Waste Transfer Station, Baloo Drive ○ Ards Blair Mayne (pool water and pool hall temperatures) 	An ideal design temperature for a condensing boiler commercial heating system would be 65°C supply, 45°C return. The lower return temperature means it can operate in part-condensing mode all year round. Although this is the most efficient setting other factors need to be considered. Such factors include: <ul style="list-style-type: none"> ○ how well the building is insulated, ○ the pipe runs throughout the building/ building size; and ○ potential for legionella risk. To complement this action, it is therefore vital that building insulation is also upgraded to prevent heat loss and support the lowering of temperature set points on boilers. It is recommended that set points are gradually lowered e.g. by 1°C each time, with periods of monitoring between each lowering until the set	Reduced consumption, costs, and emissions

			points gets to an optimum point in terms of lower temperature set point and building comfort.	
Solar Reflective/ Control film on Windows	Short term Director of Environment	Install Solar Reflective/ Control film on Windows on the Church Street building.	The identified buildings were very warm during the audit visits, with staff members mentioning the overheating and comfort issues. Additional portable air conditioning had been introduced to try to address the issue (with the associated energy consumption implications). The application of solar film to the windows in those areas experiencing overheating will reduce solar gain and will also retain heat, thereby improving both comfort levels and efficiency.	Electricity consumption, costs, and emissions reduction. Film is a widely used solution which can result in up to 1/3 savings on associated cooling requirements/ costs for those spaces which are subject to excessive solar gain. It also has comfort benefits for space users.
Pipework insulation	Short term Director of Environment	Complete insulation of pipework at the following locations: <ul style="list-style-type: none"> o City Hall, the Castle (significant lengths requiring insulation) o Ballygowan Village Hall o Marquis Hall, Bangor o Ards Blair Mayne (fit jackets to sand filters) 	Insulating pipework will reduce heat loss, thereby improving the efficiency of the heating systems	Electricity consumption, costs, and emissions reduction. Generally, maximum savings of 10-20% can be realised. This however depends on the length of uninsulated pipe run, pipe/ valve size etc.
Solar PV	Short term Director of Environment	Consider the installation of Solar PV at the following locations: <ul style="list-style-type: none"> o Ards Blair Mayne Leisure Centre o Bangor Sportsplex (add to existing system and check that existing system is operational) o Queen's Leisure Complex o Londonderry Park o Donaghadee Community Centre 	Engage a specialist installer or independent solar consultant to design/ specify systems for each building which optimises the amount of generated renewable electricity used on site, thereby minimising grid electricity use and avoidance of associated carbon emissions. Designs/ specifications should be developed using half hourly consumption/ load data. There is likely to be potential to install additional PV systems at sites with such systems already installed.	Increased use of renewable electricity, resulting in reduced grid dependency, cost reduction and carbon emissions reduction

		<ul style="list-style-type: none"> ○ Hamilton Road Community Hub ○ Manor Court Community Centre ○ Queen’s Hall ○ Recycling Centre, Bangor ○ Skipperstone Community Centre ○ Glen Community Centre ○ Portavogie Community Centre ○ Green Road Community Centre ○ Alderman Green Community Centre ○ Kircubbin Community Centre ○ North Road Works Depot ○ Kilcooley Community Centre ○ Whitechurch Cemetery ○ 2 Church Street ○ Clandeboye Cemetery ○ Conlig Community Centre 	<p>Consideration should also be given to the ‘future proofing’ of any installations i.e. to facilitate the introduction of battery storage systems once the technology is more commercially available.</p>	
Northern Community Leisure Trust (Serco) Operated Facilities	<p>Medium term</p> <p>Director of Environment</p>	<p>Completion of energy assessments for each building/ facility</p>	<p>The completion of the assessments will ensure opportunities to optimise consumption are identified an</p> <p>Due to the nature of the facilities multiple leisure sites and pavilions), these are high consuming buildings and as such have the potential for good energy reduction opportunities to be identified.</p> <p>Efforts should focus on BMS settings and controls on key plant such as AHUs, pumps etc. and the potential to upgrade existing inefficient fittings e.g. lighting as well as introduce/ increase the use of low/ zero carbon technologies such as solar PV.</p>	<p>Identification of reduction and other opportunities prior to facility handover and assessment of priority to rectify in terms of energy cost, consumption, and emissions reduction.</p>
Boiler replacement	<p>Medium term</p>	<p>Upgrade the following, less efficient heating boilers to</p>	<p>Upgrading to a more efficient heating boiler should result on average 5-10% energy efficiency</p>	<p>Consumption, cost, and emissions reduction.</p>

	<p>Director of Environment</p>	<p>improve the efficient use of energy:</p> <ul style="list-style-type: none"> ○ Bangor Sportsplex ○ Comber Adult Learning Centre ○ Green Road Community Centre ○ Groomsport Boathouse ○ Kircubbin Community Centre ○ Manor Court ○ Portavogie Community Centre ○ Queen's Hall ○ Skipperstone Community Centre ○ North Road Depot ○ Ards Blair Mayne (replace existing hot water boilers with plater heat exchangers) 	<p>improvement benefits and subsequent reduction in consumption, costs, and emissions.</p> <p>These upgrades should be prioritised based on consumption and building use/ occupancy levels at each location.</p> <p>Upgrades should be completed after consideration has been given to the fuel switching action point in locations using kerosene.</p>	
<p>Low carbon fuel replacement</p>	<p>Medium term Director of Environment</p>	<p>Complete a feasibility review to assess potential to migrate to lower carbon fuels at the following locations:</p> <ul style="list-style-type: none"> ○ Bangor Sportsplex ○ Kircubbin Community Centre ○ Portavogie Community Centre ○ Queen's Hall ○ Skipperstone Community Centre 	<p>The highlighted locations use Kerosene as a heating fuel, which is a high carbon fuel when compared to others currently available.</p> <p>Lower carbon options include:</p> <ul style="list-style-type: none"> ○ Natural Gas- limitations on availability may restrict this option. ○ Propane- this could be utilized where natural gas is not available. ○ BioLPG- a lower carbon alternative to 'virgin' propane, though it is a higher cost fuel. ○ Electric- electrification of heating in buildings could be considered, particularly along with the installation of solar PV. 	<p>Reduced carbon emissions</p> <p>Currently, LPG costs are comparable with natural gas and kerosene costs. The benefit would be on lowering carbon emissions.</p> <p>BioLPG costs are approximately 15-20% higher than standard LPG.</p> <p>Carbon emissions associated with standard LPG are approximately 40%</p>

			<p>This action focuses on carbon reduction. Cost savings may be realized but its focus is more on reducing the Council's carbon emissions.</p>	<p>less carbon intensive than kerosene.</p> <p>BioLPG is effectively zero carbon rated.</p>
<p>Lighting upgrades to LED equivalents</p>	<p>Medium term</p> <p>Director of Environment</p>	<p>Complete lighting upgrades to LED equivalents (and install PIR/ daylight controls) in the following buildings:</p> <ul style="list-style-type: none"> ○ Baloo Waste Transfer Station (T5 fittings in the main waste 'shed') ○ Bangor Sportsplex (internal lighting T8 & pitches to LED) ○ Glen Community Centre (T8 fittings) ○ Kilcooley Community Centre (install PIRs to existing LED) ○ Kircubbin Community Centre (T8) ○ Church Street Office ○ Comber Adult Learning Centre ○ Conlig Community Centre ○ Alderman George Green Community Centre (PIR) ○ Redburn Community Centre ○ Tower House (PIR) ○ Portavogie Community Centre (PIR) ○ Queen's Hall (PIR) ○ Queen's Leisure Complex (PIR) ○ Manor Court (T5 fittings to be replaced with LED) ○ City Hall, The Castle (existing fittings to be replaced with LED and controls) 	<p>Upgrading to LED lighting as well as introducing automated PIR and/ or daylight sensors will reduce electricity consumption, costs, and emissions.</p> <p>LED fittings also reduce 'whole life' maintenance costs due primarily to their longer life spans.</p>	<p>Electricity consumption, costs, and emissions reduction</p> <p>Typical savings of 30% can be realised through the installation of PIR controls and LED lighting when compared with older fittings.</p>

		<ul style="list-style-type: none"> ○ Ards Blair Mayne (microcell and PIR sensors fitted and time control added) ○ North Road Depot (fit LED lighting to all other areas that currently do not have LED) ○ Aurora (LED replacements of fluorescent and microcell/PIR controls) 		
Electric Storage Heaters	<p>Medium term</p> <p>Director of Environment</p>	<p>Complete upgrades to more efficient alternatives to existing, aged storage heater units in the following locations:</p> <ul style="list-style-type: none"> ○ Ards Arts Centre (partial replacement) ○ North Down Museum ○ Portaferry Market House 	Move to more efficient storage heaters will reduce consumption.	Electricity consumption, costs, and emissions reduction
Glazing upgrades	<p>Medium term</p> <p>Director of Environment</p>	<p>Complete glazing upgrades to the following buildings.</p> <p>Replace single glazing with double glazing:</p> <ul style="list-style-type: none"> ○ Queen’s Hall, Newtownards <p>Install secondary glazing in the following listed buildings:</p> <ul style="list-style-type: none"> ○ Town Hall, the Castle ○ Ards Arts Centre ○ North Down Museum ○ Portaferry Market House (1st Floor) ○ Tower House 	Upgrading glazing at the identified locations will reduce heat loss from the buildings, thereby improving energy efficiency.	<p>Electricity consumption, costs, and emissions reduction.</p> <p>Glazing upgrades from single pane reduces heat loss from the respective areas being upgraded. Up to 15% savings on heating costs in those areas can be realised.</p>

Unclassified

80

ITEM 9**Ards and North Down Borough Council**

Report Classification	Unclassified
Exemption Reason	Not Applicable
Council/Committee	Environment Committee
Date of Meeting	12 June 2024
Responsible Director	Director of Environment
Responsible Head of Service	Head of Waste and Cleansing Services
Date of Report	31 May 2024
File Reference	69001
Legislation	
Section 75 Compliant	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Other <input type="checkbox"/> If other, please add comment below:
Subject	Proposed Council Response to Consultation on "Rethinking our Resources: Measures for Climate Action and a Circular Economy in NI".
Attachments	Appendix 1 - Consultation Questions and Draft Response

The Consultation was launched on 7 March 2024 and sets out proposals aimed at improving the quantity and quality of household waste and business waste of a similar nature recycled in Northern Ireland ([Rethinking Our Resources - Measures for Climate Action and a Circular Economy in NI \(daera-ni.gov.uk\)](https://daera-ni.gov.uk)).

Further to a report that was brought to the Committee on this last month, it was agreed that the Elected Member Kerbside Collections Review Working Group should convene to agree a draft response to the consultation document.

The draft response agreed by the working group is attached at Appendix 1.

Not Applicable

81

RECOMMENDATION

It is recommended that the Council agrees the attached response for submission to DAERA.



Rethinking Our Resources:

Measures for Climate Action
and a Circular Economy in NI

Questions

March 2024



Department of
**Agriculture, Environment
and Rural Affairs**

www.daera-ni.gov.uk

***Sustainability** at the heart of a living,
working, active landscape
valued by everyone.*

Annex - Questions posed via Citizen Space for consultation.

GENERAL

What is your name?

Nigel Martin

What is your email address?

Nigel.martin@ardsandnorthdown.gov.uk

Are you responding to this consultation representing an organisation you work or volunteer for?

Yes. Skip to Question 5

No

You selected “no” to Question 3. This means that you are responding to the consultation as an individual householder/member of public. If this statement does not describe how you wish to respond, please amend your answer to Question 3. If you are happy to proceed, please select Yes. If you select No, the survey process will end.

Yes. I am responding as a householder/member of public. Please proceed to Proposal 1.

No

Which category best represents you from the list below?

Category	Please Select
Trade Body (Waste Sector)	
Local Council	X
Local Council Sector Body	
Waste Management Company (Collectors, Sorters, Infrastructure Operators of Treatment Facilities for various streams)	
Reprocessors (End Destination)	
Non-Governmental Organisation (NGO)	
Businesses and Non-Household Municipal (NHM) producing organisations	
Trade Body (representing business sectors)	
Other	

If applicable, please state the name of the organisation you are responding on behalf of.

Northern Ireland Local Government Association

Part 1: Proposals to improve commonality in recycling from households

Proposal 1: To restrict the residual waste capacity for households in Northern Ireland to a maximum of 90 litres per week, delivered either via a 180-litre wheeled bin collected fortnightly or a 240 litre wheeled bin collected every three weeks. Councils would decide on the most appropriate methodology for their own circumstances.

1. Do you agree with the proposal to restrict the capacity of residual waste for average households to a maximum of 90 litres per week? Some households may require additional containment or alternative arrangements. See question 6.

- No
- If no, your response should include clear evidence as why residual waste capacity should not be restricted. Evidence with justification to extend timescales should be provided, if appropriate.
- Unsure

The Council is not clear on the mitigation measures available for households that may require additional capacity and believe the Department should provide a strategy for dealing with nappy waste as a separate waste stream with reference to the Welsh government trials with disposable nappy waste: - www.bbc.co.uk/news/uk-wales-60525088

2. Some Councils may not be able to restrict the capacity of residual waste by the date proposed (within 24 months of notification of a statutory requirement). In this table we set out some circumstances which may delay changes to residual waste restriction. Please complete the table, providing evidence with justification as to why timescales should be extended, as appropriate.

Not all rows need to be completed. Please use N/A where not applicable.	
Contracts for residual waste treatment	N/A
Procurement processes for new containers	N/A
Manufacturing capacity for new containers	N/A
Projects outcomes from residual waste reduction action	N/A
Cost burdens	N/A
Ability to resource & mobilise within the required timescale	N/A
Other - please describe: Getting the publics buy-in to what is a major change to a frontline service used by almost every household. Guarantee of available Central Government financial support where required.	

Rethinking Our Resources: Measures for Climate

Action and a Circular Economy in NI - March 2024 - Questions

3. If the proposal to restrict the capacity of residual waste for households is adopted, what is your preference for how this should be delivered? If other, please provide an explanation in the box below.

- 180 litre capacity bins collected fortnightly.
 240 litre capacity bins collected three weekly.
 Other
 Unsure

If you responded other, please set out your reasons, with clear evidence in the box below.

This should be left to individual Councils in context of their particular operational arrangements/needs, as long as the target maximum of 90L per week is achieved.

4. Do you agree that forms of restricted capacity for residual waste collections should apply to all households, including those dwellings such as flats and houses in multiple occupation where citizens share a communal bin?

- Yes
 No
 Unsure

If you disagree with this proposal, please provide the reason for your response below. Your response should include clear evidence, relating to collection of residual waste from communal settings, such as residual waste yields per dwelling per year and learnings or project outcomes from action to reduce residual waste in communal settings.

5. Do you agree that restricted capacity for residual waste collections should be rolled out across NI simultaneously (or as near as possible) to assist local councils with communicating the changes to households?

- Yes
 No
 Unsure

If you disagree with this proposal, please provide the reason for your response below. Your response should include clear evidence as to why a staggered roll out is preferable.

Ideally yes, but this will be heavily influenced by funding availability, and by the fact that councils are autonomous. Some councils may be more able to move ahead more quickly depending on their financial situation and the willingness of their local population to accept change.

Rethinking Our Resources: Measures for Climate

Action and a Circular Economy in NI - March 2024 - Questions

6. Do you agree that households who demonstrate that they meet the following criteria could be provided with more than the maximum of 90 litres per household per week?

	Yes agree	No disagree		Unsure
Household comprises more than 6 residents.	Yes (provided they fully engage in available recycling services)	If selected, please define the number of citizens in a household where exclusions should apply, with evidence to justify your response.		
Households where citizens have medical conditions which produce additional waste, such as produce to manage incontinence.	Yes	If selected, please provide evidence to justify your response.		
Households where there are more than two children using disposable nappies.	Yes	If selected, please provide evidence to justify your response.		
All households in the collection subsequent to the Christmas break, where presentation of a restricted amount of side waste is acceptable.		If selected, please provide evidence to justify your response, including details on the quantity of side waste that could be accepted.	No, such an arrangement discourages recycling and poor segregation of recyclables	
Other (Please detail). If selected, please provide evidence to justify your response.				

Proposal 2: To require local Councils to collect a core set of dry recyclables from households to help avoid confusion and improve consistency and the quality of recyclable material.

1. Do you agree that the core set of materials comprising dry recycling collections by councils should comprise as the list below, as a minimum?

	Agree. All items listed in the row should be included	Disagree. All items listed in the row should not be included. Please state which ones and why.	Unsure
Paper and card, including newspaper, cardboard packaging, writing paper etc.	Agree		
Glass bottles and jars - including drinks bottles, condiment bottles, jars, etc. and their metal lids.	Agree		
Metal packaging: aluminium cans, foil and aerosols, and steel cans [and aerosols], aluminium tubes.	Agree		
Plastic: bottles including drinks bottles, detergent/ shampoo/ cleaning products; pots, tubs, and trays; plus cartons (such as Tetrapak®).	Agree		

2. Do you agree with our proposal that will require the kerbside collection of the core set of dry recyclables within 24 months of notification of a statutory requirement?

- Yes
- No - If no, your response should include clear evidence as to which materials you consider should not be incorporated within the list and why. Evidence with justification to extend timescales should be provided, if appropriate.
- Unsure

Rethinking Our Resources: Measures for Climate

Action and a Circular Economy in NI - March 2024 - Questions

3. Some Councils may not be able to collect the core set of dry recyclables by the date proposed. In the table below we set out some circumstances which may delay changes to recycling collections. Please provide evidence with justification why timescales should be extended, as appropriate.

Not all rows need to be completed. Please use N/A where not applicable.	
Contracts for dry recyclable collection.	N/A
Sorting or reprocessing.	N/A
Procurement processes for new containers or vehicles.	N/A
Manufacturing capacity for new containers or vehicles.	N/A
MRF infrastructure or capacity.	N/A
Container distribution	N/A
End Market volatility/lack of end markets.	X
Other - please describe. The lack of local end markets means NI councils are increasingly reliant on overseas markets for re-processing capacity with associated risks and volatility.	

Proposal 3: That additional materials are added to the core set over time when feasible, with flexible plastic packaging set to be collected from households by the end of the financial year 2026/2027.

1. As plastic films will need to be added to the core set of dry recyclables by no later than 31st March 2027, please state how you propose plastic films should be collected at the kerbside, ensuring quality and quantity of other dry recyclables. Select one of the options below (tick box).

- Collected as a separate stream from all other recyclables, and from residual waste I.e., in a dedicated bag or container.
- Collected in a container alongside other plastics - bottles, pots, tubs, and trays.
- Collected mixed with other dry recyclables in the same container.
- Unsure.
- Other (please detail and explain your reasoning for this proposal with supporting evidence).

2. Collecting plastic films by the 31st March 2027 may be challenging for some Councils. In this table we set out some circumstances which could affect a Council's ability to collect plastic film by this date. Please provide evidence with justification detailing why this timescale will be challenging.

Rethinking Our Resources: Measures for Climate

Action and a Circular Economy in NI - March 2024 - Questions

Not all rows need to be completed. Please use N/A where not applicable.	
Contracts for plastic film collection.	N/A
Sorting or reprocessing.	No local re-processing capacity
Procurement processes for new containers or vehicles.	N/A
Manufacturing capacity for new containers or vehicles.	N/A
MRF infrastructure or capacity.	May require modifications
Container distribution.	N/A
End Market volatility/lack of end market.	Untested market so may be an issue
Factors relevant to collections from flats and houses in multiple occupation, where citizens share communal containers.	N/A
Other - please describe	

3. Do you agree that the list of materials to be collected as a minimum by councils should be regularly reviewed, and providing certain conditions met, expanded?

Yes

No

Unsure

If you disagree with this proposal then please provide the reason for your response below with clear evidence on why you do not agree with regular reviews of the minimum list and why the list should not be expanded, provided certain conditions are met.

4. If the proposal for a minimum list of materials to be collected for dry recycling were to be adopted and regularly reviewed, do you agree that the frequency of review should be every two years.

Yes

No

Unsure

If you answered “No,” then please provide the reason for your response below. Your response should include clear evidence as to what frequency of review would be more appropriate.

Rethinking Our Resources: Measures for Climate

Action and a Circular Economy in NI - March 2024 - Questions

5. What, if any products or materials do you consider should be also included in the core list of materials to be collected by councils? Please provide your response in the box below as to why the list should include the material(s).

Consideration should be given to textiles on account of their Carbon impact and their potential contribution to achieving net zero (refer to table 3 – WRAP’s Carbon Warm Metric in the RIA Document).

6. Do you agree that the materials comprising the items below should be excluded currently from the minimum list of materials for collection by councils within dry recycling collections?

Type	Examples	Agree. Items listed in the row should be excluded from recycling	Disagree. Items listed in the row should be included for recycling. Please state which items should be included and why	Unsure
Glass	Ceramics, for example crockery, earthenware Drinking glasses Flat glass Glass cookware including Pyrex® Light bulbs and tubes Microwave plates Mirrors Vases Window glass.	Agree		
Metal	Laminated foil, for example pet food pouches, coffee pouches. General kitchenware, for example cutlery, pots, and pans. Any other metal items, for example kettles, irons, pipes, white goods.	Agree		

Rethinking Our Resources: Measures for Climate

Action and a Circular Economy in NI - March 2024 - Questions

<p>Plastic</p>	<p>Any plastic packaging or non-packaging items labelled as “compostable” or “biodegradable” (including but not limited to coffee pods and cutlery) with the exception of food waste caddy liners in food waste recycling collections.</p> <p>Plastic pouches with laminated foil layer for example pet food pouches, coffee pouches.</p> <p>Plastic bottles containing white spirits, paints, engine oils and anti-freeze.</p> <p>Bulky rigid plastics such as garden furniture, bins, and plastic toys.</p> <p>Polystyrene (expanded and high impact).</p> <p>Polyvinyl chloride (PVC) packaging.</p>	<p>Agree</p>		
<p>Paper and card</p>	<p>Absorbent hygiene products (AHPs) including nappies, period products and incontinence items.</p> <p>Cotton wool, make up pads. Tissue/toilet paper.</p> <p>Wet wipes for example for nappy changing times, kitchen/ bathroom cleaning.</p>	<p>Agree</p>		

Rethinking Our Resources: Measures for Climate

Action and a Circular Economy in NI - March 2024 - Questions

<p>Any other items - please state which items and why they should be specifically excluded from recycling.</p>			
---	--	--	--

7. Do you agree that the core list of materials in the dry recycling stream should apply to all households, including flats and houses in multiple occupation, where citizens share communal containers?

Yes

No

Unsure

If you disagree with this proposal, please provide the reason for your response below. Your response should include clear evidence, relating to issues with collection of named materials from communal settings such as containment, contamination, engagement with citizens.

Proposal 4: To highlight NI's unique legislation on the quality of dry recyclable materials, the proposed term QualiTEE should be adopted to describe the exceptions to collecting dry recyclable materials separately.

1. Do you agree with our proposal that the term QualiTEE should be used to describe the process of determining if there may be an exception to collecting dry recyclable materials separately?

Yes

No - If no, your response should include clear evidence as to why the term QualiTEE is not your preference. Evidence with justification for alternative terminology should be provided.

Unsure

We believe that it should be left to the re-processors and end markets to define what is acceptable in terms of meeting quality standards. If modern MRFs can achieve effective materials separation and recovery to meet the requirements of re-processors, then commingled collections should also be deemed acceptable. Ultimately the choice of collection system should remain a matter for councils to decide. The adoption of QualiTEE by NI only may create difficulties in relation to EPR arrangements that will apply to all regions.

Proposal 5: The default position for collection of dry recyclables from households is in four separate streams.

1. As per the default position do you agree that councils should be required to collect "multi-stream," with at least: (i) fibres (paper/card), (ii) plastics, (iii) metals, and (iv) glass separately from each other in the dry recycling collection?

Yes

No

Unsure

Rethinking Our Resources: Measures for Climate

Action and a Circular Economy in NI - March 2024 - Questions

If you disagree with this proposal, then please provide the reason for your response below. Ideally, your response should include clear evidence of how recyclables streams can be successfully collected including methods to preserve quality for recycling, the quantities and proportions of materials sent for recycling, both for closed and open loop processing.

We see no logic in the collection of metals and plastics separately, as the technology exists to ensure 100% effective separation in a MRF. Similarly mixed metals (aluminium and steel) and mixed plastics (HDPE, MDPE and LDPE) still need to be separated for end markets.

2. Do you agree with our proposal that will require the core set of dry recyclables to be collected separately from each other in the dry recycling collection (i.e., multi-stream) within 24 months of notification of a statutory requirement and/ or notification of Extended Producer Responsibility funding allocation?

- Yes
 No
 Unsure

If you disagree with this proposal, then please provide the reason for your response below. Your response should include clear evidence as to why the dry recyclables cannot be collected separately from each other within the proposed timeframe. Evidence with justification to extend timescales should be provided, if appropriate.

We do not accept the need for separate collections of the 4 core materials, as per previous response.

Proposal 6: Standardised written assessments are prepared by councils where two or more dry recyclables are mixed during the collection process, evidencing why separate collections are not practicable and that co-collection delivers recyclable material of comparable quality.

1. Where councils cannot collect each dry recyclable waste stream separately, do you agree that the council should produce a written assessment and make available to the NI Environment Agency to outline the exception (s) to the requirement, on the basis of Comparable Quality, Technical Feasibility, Economic Costs and Environmental Outcomes (QualiTEE).

- Yes
 No
 Unsure

Rethinking Our Resources: Measures for Climate

Action and a Circular Economy in NI - March 2024 - Questions

95

If you disagree with this proposal, then please provide the reason for your response below.

We believe it should be down to MRF Operators and the Re-processors to define what is acceptable in terms of quality and for councils to adopt and develop their collection systems accordingly without the need for assessments.

2. Where councils cannot collect the dry recyclable waste streams separately, do you agree that the council should provide a written assessment based on the template shown in Appendix 2 to outline the exception(s) to the requirement?

- Yes
 No - further content should be added.
 No - content should be removed.
 Unsure

If you disagree with this proposal then please provide the reason for your response below, including your suggested amendments to the template.

As per previous response

3. Do you agree or disagree with the recommendation that Councils should review and re-submit written assessments at least every 7 years?

- Yes
 No
 Unsure

If you disagree, please select one of the following statements that best describes why:

- Revising written assessments every 7 years is too frequent (please state how frequently you think they should be revised and evidence why).

Revising written assessments at least every 7 years is too infrequent (please state how frequently you think they should be revised and evidence why).

Other (please detail).

We consider the provision of written assessments to justify the delivery of collection services unnecessary bureaucracy and resources would be better spent on recycling education and enforcement to improve quality.

Proposal 7: A set of conditions should be set out that define comparable quality, best environmental outcome, technical feasibility and disproportionate economic cost- “QualiTEE”. Where conditions are met, an exception may apply, and two or more recyclable waste streams may be collected together from households.

Proposal 7a: Similar guidance on MRF sampling, to that used in England and Wales, should be introduced in NI to ensure that the quality of input and outputs for MRFs can be quantified.

1. In terms of disproportionate economic costs, to demonstrate if there is an excessive cost to collect recyclable waste in separate waste streams, do you agree that the following factors should be provided and evidenced by the council:

Factors	Yes agree	No disagree. If you disagree, please provide information as to why you disagree, providing clear evidence of why the factors should be included/ excluded.	Unsure
Gate fees and material income.	Yes		
Salaries and staff numbers - including supervision.	No	Supervisory and support staff carry out a range of duties and it is difficult to apportion costs relating to recycling collections.	
Container costs, numbers, and replacements.	Yes		
Vehicle types, costs, finance, depreciation, hire, running costs.	Yes		
Quantities of materials collected, frequency of collection.	Yes		
Associated overheads including depot costs.	No	Shared facility with other Council service areas, so difficult to apportion costs across the various services.	
Contract length, penalties associated with variations.			
Other (please detail). Health and Safety considerations including evidence of repetitive strain injuries from Kerbside sort activity and the potential for future personal injury claims.			

2. Do you agree that the following factors should be considered when evaluating economic costs:

Factors	Yes agree	No disagree. If you disagree, please provide information as to why you disagree, providing clear evidence of why the factors should be included/ excluded.	Unsure
Adverse environmental costs.	Yes		
Adverse health impacts.	Yes		
Potential for efficiency improvements.	Yes		
Revenues from sales of secondary raw materials.	Yes		
Application of the polluter pays principle.	Yes		
Application of Extended Producer Responsibility.	Yes		
Other (please detail). Adverse health and safety impacts			

3. Do you agree that economic costs could be considered to be disproportionately excessive on a method of calculating an average cost per household deviation from a standard separate collection system cost?

- Yes
- No
- Unsure

If no, please provide information as to why you disagree, providing clear examples of alternative approaches to define excessive cost differences between systems, including a value you consider appropriate to differentiate economic impacts.

4. Please detail examples of technical challenges, with any supporting evidence, which you believe demonstrate that a separate collection of dry recyclables will not be feasible in circumstances for some or all properties.

- [Limited secure storage space for multiple separate waste containers](#)
- [Isolated rural properties meaning excessive down time when vehicles are required to empty.](#)
- [Provision of additional storage for separate waste streams when direct delivery to re-processors is impractical.](#)
- [General public’s preference for commingled collections](#)
- [Public acceptance of kerbside sort systems.](#)

Rethinking Our Resources: Measures for Climate

Action and a Circular Economy in NI - March 2024 - Questions

5. In order to make the case that separate collection does not deliver the best Environmental Outcome compared to the collection of recyclable waste streams together, do you agree that the overall impact of the management of the household waste stream evidence should be provided on the measures listed but not limited to the following:

Measures	Yes - agree	No disagree - please provide information as to why you disagree, providing clear evidence	Unsure
Quantities of materials classed as contamination and not recycled.	No	The design of MRF Reception area means that materials received from various sources are not segregated, so contamination figures are an average across all contributors and not individual councils.	
Quantities of materials lost from sorting processes at a MRF.	Yes		
Vehicle emissions from collection rounds.	Yes		
Vehicle emissions from bulk transportation to sorting and reprocessing both in NI and overseas.	Yes		
Emissions from disposal/ treatment including savings arising from landfill diversion; and	Yes		
Carbon savings from using recycled materials rather than virgin materials.	Yes		
Other factor to be added - please describe.			

6. Do you agree that the following evidence factors should be provided by a Council to demonstrate that materials are of comparable quality.

Evidence Factors	Yes - agree	No disagree - please provide information as to why you disagree, providing clear evidence	Unsure
Comparable quantities (+/-2%) of each material stream sent for closed loop recycling.	Yes		
Comparable quantities (+/- 5%) of each material stream sent for open loop recycling.	Yes		
Other factor to be added - please describe.			

7. Do you agree standard default values and data that have clearly referenced sources (that cover comparable Quality of materials, Environmental outcomes, Technical feasibility or Economic Costs) which could be used to support a written assessment, would be useful?

- Yes
- No
- Unsure**

If you disagree, please provide the reason for your response.

There is insufficient information provided within the consultation document to enable an informed response to this question. More clarification is required as to what is meant by this question.

8. Do you agree with the principle that MRFs in NI should follow the same input and output sampling guidance used as part of Environmental Permitting Regulations in England and Wales?

- Yes**
- No
- Unsure
- If no, your response should include clear evidence as to why similar sampling protocols to England and Wales should not be followed in NI?

Proposal 8: The quality of recyclate for reprocessing is important and needs to be improved through changes to collections and clear measures should be set to describe quality.

1. Which of the following options are your most preferred scenarios concerning the mixing of materials? Please rank the following options 1 (most preferred) to 4 (least preferred). If you consider that some options are not viable, please do not include these in your ranking, in which case, please rank only one, two or three option(s). Please focus on comparable quality of materials, rather than economic costs or technical feasibility of collections. You will note that we have set out clearly in the options which streams are separate, and which are mixed. If you are not sure or have no preference, please skip this question.

Options	Ranking (1 - most preferred; 4 - least preferred). Leave blank for option(s) you consider are not viable	Please provide clear evidence in support of your selection for this ranking
<p>Option A - “three stream”</p> <ul style="list-style-type: none"> • Separate stream of glass bottles & jars; with • Separate stream of paper & card; with • Mixed stream of: metal packaging and plastics bottles, tubs, and trays 	1.	As a result of breakages, glass has the greatest potential to cause cross-contamination issues and should be collected separately.
<p>Option B - “two stream: fibres out”</p> <ul style="list-style-type: none"> • Separate stream of paper & card; with • Mixed stream of: metal packaging, plastic bottles, tubs and trays and glass bottles & jars 	3.	Broken glass shards could lead to cross-contamination of plastics.
<p>Option C - “two stream: glass out”</p> <ul style="list-style-type: none"> • Separate stream of glass bottles and jars; with • Mixed stream of: metal packaging, plastics bottles, pots & trays, and paper & card 	2.	Plastic bottles and metal cans can often contain traces of liquid that can in turn increase the moisture content of paper/card resulting in the rejection of loads by re-processors.
<p>Option D - “fully co-mingled”</p> <ul style="list-style-type: none"> • Mixed stream of: metal packaging plastics bottles, pots, tubs & trays, paper, card, and glass bottles & jars 	4.	Glass likely to cause cross-contamination issues and recovered glass may not be of sufficient quality for remelt and closed loop recycling.

Proposal 9: Commingled collection of plastics and metals should be exempt from requirements to collect these materials as separate fractions.

1. Do you agree that Councils may have an exemption from the regulations where they mix plastics and metals, thus should not be required to prepare a written assessment to seek an exception from the regulations where these two materials are collected together? Note that a Council may still select to collect these recyclable waste streams as separate materials.

- Yes**
- No - all material streams should be collected separately.
- No - more mixing of materials should be permissible.
- Unsure

If you answered no, please provide information as to why you disagree, providing clear evidence as to why you consider all material streams should be collected separately, or more mixing should be permissible.

2. What other exemptions would you propose to the requirement to collect the recyclable waste streams separately, where it would not significantly reduce the potential for recycling? Please provide your evidence in the box below.

Collection model as per the 3-stream model described in Proposal 8.

Proposal 10: Revisions to household food waste collections to increase capture rates and improve the diversion of food waste from disposal should be introduced, ensuring all householders, including those living in flats, can recycle more and in time have access to separate, weekly food waste recycling collections.

1. We have listed possible collection methods for food waste from kerbside properties below, some of which we consider are suitable short term. How would you rank the following options for food waste collections, where 1 is most preferred and 4 is least preferable? If you consider that some options are not viable, please do not include these in your ranking, in which case, please rank only one, two or three option(s).

Rethinking Our Resources: Measures for Climate

Action and a Circular Economy in NI - March 2024 - Questions

Options	Ranking (1 - most preferred; 4 - least preferred). Leave blank for option(s) you consider are not viable	Please provide clear evidence or statements in support of your preferred selection for your ranking
A separate weekly collection of food waste with additional arrangements for garden waste.	3.	Additional containers, vehicles and crew needed with little evidence to support increased capture rates (refer to Council's current capture rates in WasteDataFlow).
A weekly mixed food and garden waste collection.	2.	Additional vehicles and crews needed with little evidence for increased capture rates.
A separate fortnightly collection of food waste with additional arrangements for garden waste.	4.	Likely to result in lower capture rates than currently achieved.
A fortnightly mixed food and garden waste collection.	1.	Council's current collection model that consistently achieves high capture rates for food waste.
Other - please detail.		

2. Do you agree with our proposal that all kerbside properties should in future have access to a least a weekly collection for food waste to increase capture rates of food waste?

- Yes
- No
- Unsure

If you disagree with this proposal, please provide the reason for your response below, with clear evidence.

We remain to be convinced that weekly food waste only collections achieve higher yields and similarly are not convinced that the additional costs (financial and environmental) of providing a weekly service achieve carbon savings. The availability of AD Treatment locally may also be an issue.

3. Do you agree that all households, including those dwellings such as flats and houses in multiple occupation where citizens share a communal bin should have access to at least a weekly collection for food waste?

- Yes
- No
- Unsure

Rethinking Our Resources: Measures for Climate

Action and a Circular Economy in NI - March 2024 - Questions

If you disagree with this proposal, please provide the reason for your response below, with clear evidence.

For the reasons listed under Q.2 and current experience of how communal bins are prone to contamination issues.

4. Do you agree that councils should be required to implement a weekly food waste collection service from kerbside properties, keeping food and garden waste separate, by the points in time listed below?

Time Period	Yes	No	If you answered no, please provide the reason for your response with clear evidence such as collection contracts, treatment contracts, treatment infrastructure capacity (AD/IVC), cost burden, reprocessing, end markets.	Not sure
24 months from notification of a statutory requirement.		x	Current Organics Contract runs until 2029.	
3 to 4 years from notification of a statutory requirement.		x	Introduction would require a complete service redesign	
More than 4 years from notification of statutory requirement.		x	We believe that the environmental and financial cost of implementation would outweigh any improvement in capture rates.	
Never.				
Other - please detail.				

5. Do you agree that guidance should be provided on caddy liners, including on caddy liner material types?

- Yes
- No
- Unsure

If you disagree with this proposal, please provide the reason for your response below, with clear evidence.

Rethinking Our Resources: Measures for Climate

Action and a Circular Economy in NI - March 2024 - Questions

6. Do you agree that caddy liners should be provided free of charge to citizens that participate in food waste collection? (Please select only one option).

(1) Yes, via Council offices, libraries, leisure centres etc.	X
(2) Yes, as in (1) and via citizens adding their own note to their food waste containers to request new liners which crews deliver.	
Yes, as in (1) and via a tag supplied in the roll of caddy liners that is attached to the food waste container by the citizen when their supply is low. Crews deliver new liners.	
Other method - please detail.	Annual free doorstep delivery
No - citizens should purchase their own liners.	
Not sure.	

If you disagree with this proposal, please provide the reason for your response below, with clear evidence.

Proposal 11: Through collaboration with Councils, we will set out proportionate and robust guidelines for compliance and enforcement that enable Councils to enhance their waste and recycling services.

1. Do you agree that section 21 of the Waste and Contaminated Land (Northern Ireland) Order 1997, as amended, should be clarified to set out the circumstances in which Councils can enforce householders to place items of waste and recycling in certain receptacles and the levels of fixed penalty notice that could be levied where householders do not comply?

Yes

No

Unsure

If you disagree with this proposal, please provide the reason for your response below, with clear evidence.

Rethinking Our Resources: Measures for Climate

Action and a Circular Economy in NI - March 2024 - Questions

2. Do you agree that the following options should be adopted to help to improve the quality of recycling collected from households:

	Yes	No - if no, please state why	Unsure
Issuing standardised information in the form of leaflets to citizens at least annually.	X		
Crew training on how to manage containers with the wrong items.	X		
Oversight of crew working practices.			
Better support to crews and recognition of their work.	X		
Clear and updated visually appealing websites.	X		
Other - please detail.			
Crew training, working practices and support are operational issues for councils and are not a policy concern for the Department.			

3. If a Fixed Penalty Notice system were to be levied where people continue to put the wrong items in their recycling containers, which of the values proposed for the Fixed Penalty Notice do you consider to be appropriate?

	About right	Too low	Too high	Unsure
£50		X		
£75		X		
£100 (existing value)	X			
£150			X	
£200			X	

Other value you feel is appropriate - please detail.	
--	--

Proposal 12: Non-Statutory Guidance will be provided to councils to expand the opportunities to recycle more materials and to embed best practice in existing services.

1. Do you agree that Non-Statutory Guidance would be useful as a framework on good practice collections from kerbside and communal dwellings, HWRCs and bring sites?

Yes

No

Unsure

If you disagree with this proposal, please provide the reason for your response below, with clear evidence.

Rethinking Our Resources: Measures for Climate

Action and a Circular Economy in NI - March 2024 - Questions

107

2. Do you agree that the following topics should be included in Non-Statutory Guidance to Councils on collections:

Topic	Yes	No - if no, please provide details on why you consider this topic not to be relevant.	Unsure
Collection of hazardous waste from HWRCs.	X		
Collection of textiles, batteries, WEEE from the kerbside and communal properties.	X		
Collection of cooking and engine oil from the kerbside.		No, would require additional investment in vehicles and staff for small return.	
Collection of AHPs (nappies, incontinence products) from the kerbside.	X		
Standardised arrangements for assisted collections from the kerbside.	X		
Standardised price ranges and arrangements for bulky waste collections.	X		
Standardised arrangements for replacement containers.	X		
Standardised arrangements for excess recycling.	X		
Other - please detail.			

Part 2: Proposals to improve consistency in recycling from businesses and the wider NHM sector

Proposal 13: The scope of the revised definition of municipal waste would include mixed waste and separately collected waste from other sources, where such waste is similar in nature and composition to waste from households. Specifically, wastes from production, agriculture, forestry, fishing, septic tanks and sewage network and treatment, including sewage sludge, end-of-life vehicles or waste generated by construction and demolition activities, are excluded.

1. Do you agree with the list of out-of-scope waste producers, who will not be obligated to segregate a core set of dry recyclables from their residual waste?

Yes

No

Unsure

If you disagree with this proposal, please provide the reason for your response below, with clear evidence.

NILGA has no strong view on this issue.

Proposal 14: Businesses and the wider non-household municipal (NHM) sector will be required to segregate from residual waste a core set of dry recyclables, to improve recycling behaviour and activity and ensure consistency between what people can recycle at home, at school and at work.

1. Do you agree with the contents of the list below, detailing the materials that should be included in the core set of recyclable streams collected separately from businesses and NHM producing premises by waste collectors, as a minimum?

	Agree. All items listed in the row should be included.	Disagree. All items listed in the row should not be included for recycling. Please state which ones should be excluded and why.	Unsure
Paper and card, including newspaper, cardboard packaging, office, writing paper etc.	X		

Rethinking Our Resources: Measures for Climate

Action and a Circular Economy in NI - March 2024 - Questions

	Agree. All items listed in the row should be included.	Disagree. All items listed in the row should not be included for recycling. Please state which ones should be excluded and why.	Unsure
Glass bottles and jars - including drinks bottles, condiment bottles, jars etc and their metal lids.	X		
Metals: aluminium cans, foil and aerosols, and steel cans [and aerosols], aluminium tubes.	X		
Plastic bottles - including drinks bottles, detergent/ shampoo/ cleaning products; pots, tubs, and trays plus cartons (such as Tetrapak).	X		

2. Do you agree with the contents of the list below, detailing those materials that should be excluded currently from the core set of dry recyclables and therefore not collected by waste collectors from obligated businesses, public bodies, and other organisations, as a minimum?

Material	Items proposed to be excluded.	Agree. All items listed in the row should be excluded from recycling.	Disagree. Items listed in the row should be included for recycling. Please state which items should be included and why.	Unsure
Glass	Ceramics, e.g., Crockery or earthenware Drinking glasses Flat glass Glass cookware including Pyrex Light bulbs and tubes Microwave plates Mirrors Vases	X		

Rethinking Our Resources: Measures for Climate

Action and a Circular Economy in NI - March 2024 - Questions

Material	Items proposed to be excluded.	Agree. All items listed in the row should be excluded from recycling.	Disagree. Items listed in the row should be included for recycling. Please state which items should be included and why.	Unsure
Metal	<p>Laminated foil i.e., pet food pouches, coffee pouches.</p> <p>General kitchenware i.e., cutlery, pots, and pans.</p> <p>Any other metal items, i.e., kettles, irons, pipes, white goods.</p>	X		
Plastic	<p>Any plastic packaging or non-packaging items labelled as “compostable” or “biodegradable” (including but not limited to coffee pods and cutlery) with the exception of food waste caddy liners in food waste recycling collections.</p> <p>Plastic pouches with laminated foil layer i.e., pet food pouches, coffee pouches.</p> <p>Plastic bottles containing white spirits, paints, engine oils and antifreeze.</p> <p>Bulky rigid plastics such as garden furniture, bins, and plastic toys.</p> <p>Polystyrene (expanded and high impact) Polyvinyl chloride (PVC) packaging.</p>	X		

Material	Items proposed to be excluded.	Agree. All items listed in the row should be excluded from recycling.	Disagree. Items listed in the row should be included for recycling. Please state which items should be included and why.	Unsure
Paper and card	Absorbent hygiene products (AHPs) including nappies, period products and incontinence items Cotton wool, make up pads. Tissue/toilet paper. Wet wipes for example for nappy changing times, kitchen/ bathroom cleaning .	X		

3. Do you agree that the list of materials to be collected as a minimum should be regularly reviewed, and providing certain conditions met, expanded?

Yes

No

Unsure

If you disagree with this proposal, then please provide your reason with supporting evidence in the box below.

4. If the proposal for a minimum list of dry recyclable materials to be collected for recycling were to be adopted and regularly reviewed, do you agree that the frequency of review should be every two years.

Yes

No

Unsure

If you answered “No” please provide the reason for your response. Your response should include clear evidence as to what frequency of review would be more appropriate.

5. What, if any, other products or materials do you consider should be also included in the minimum list of materials to be collected by waste collectors from obligated businesses, public bodies, and other organisations? Please provide your response in the box below and clear evidence as to why the list should include the material(s).

Proposal 15: Subject to the costs being covered by packaging EPR (pEPR) and confirmation that the material can reasonably be collected for recycling, additional materials will be added to the core set over time, with businesses and NHM producing premises to be required by legislation to segregate flexible plastic packaging for recycling no later than March 31st 2027.

1. Do you have any views on how plastic film should be collected from obligated businesses, public bodies, and other organisations?

- Collected as a separate stream from all other recyclables, and from residual waste I.e., in a dedicated bag or container.
- Collected in a container alongside other plastics - bottles, pot, tubs, and trays.
- Collected mixed with other dry recyclables in the same container.
- Other (please detail and explain your reasoning for this proposal with supporting evidence).
- Unsure.

2. Collecting plastic films from all obligated businesses, public bodies and other organisations by the 31st March 2027 may be challenging. Using the list below please select those reasons which you believe will affect the ability to collect plastic film by this timeframe from businesses and NHM producing premises.

Please provide evidence with justification, as appropriate. Not all rows need to be completed. Please use N/A where not applicable.	
Collection and treatment contract limitations.	X
MRF infrastructure and/or capacity.	X
Inability to resource and mobilise within the timeframe.	X
Cost Burden to obligated businesses, and NHM producing premises.	N/A
Reprocessing availability.	X
End Market volatility/lack of end markets.	X

Proposal 16: The Food Waste Regulations (Northern Ireland) 2015 will be revised to require all NHM premises which generate food waste, to be required to segregate food waste from their residual waste for recycling. An additional two years to implement such changes will be granted for small and micro sized businesses.

1. Do you agree with our proposal that will require the separate collection of food waste from all businesses and the wider NHM sector within 24 months of notification of a statutory requirement?

- Yes
- No - If no, your response should include clear evidence as to which materials you consider should not be incorporated within the list and why. Evidence with justification to extend timescales should be provided, if appropriate.
- Unsure

2. Do you agree that the Food Waste Regulations (Northern Ireland) 2015 should be extended to require all obligated businesses, public bodies, and other organisations to segregate food waste for separate collection?

- Yes, I agree - the Regulations should be extended to cover all obligated businesses, public bodies and other organisations, no matter of their size or nature. (If yes, go to Q7).
- No, I disagree - the Regulations should not be extended to cover all obligated businesses, public bodies or other organisations, no matter of their size or nature, some exemptions or phasing should apply.
- Unsure

3. If you disagreed, do you believe that exemptions to the Regulations should apply based on the amount of food waste produced by obligated businesses, public bodies, or other organisations?

- Yes
- No (If no, go to Q5).
- Unsure

If you have answered no, please explain why you have this view, supplying evidence to justify your opinion.

4. If you believe that exemptions to the Regulations should apply based on the amount of food waste produced by obligated businesses, public bodies, or other organisations, what parameter should be used to determine the de minimis amount? Please select from the list provided.

- 0-5kg of food waste per week.
- 5kg+ food waste per week.
- Other (please specify and provide evidence to support your proposal).

5. If you disagreed, do you believe that exemptions or phasing should be applied to the amended Food Waste Regulations (Northern Ireland) 2015 for some obligated businesses, public bodies, and other organisations? Please select the option that most closely represents your view and provide evidence to support your comments.

- Option 1** - All obligated small (businesses, public bodies and other organisations that employ between 10-50 FTEs) and micro-firms (businesses, public bodies and other organisations that employ up to 9 FTEs) should be exempt from any requirement to segregate food waste from other waste streams.
- Option 2** - All obligated small (businesses, public bodies and other organisations that employ between 10-50 FTEs) and micro-firms (businesses, public bodies and other organisations that employ up to 9 FTEs) should be given two additional years to comply with the new requirements (i.e., compliant 4 years post the legislative enactment).

If neither of the above options represents your view, please detail your view providing the reason for your response, and indicate if appropriate how long obligated businesses, public bodies, and other organisations, would require before they can segregate a core set of recyclables for recycling.

6. If you disagreed, do you believe that some obligated businesses, public bodies, or other organisations should not be required to segregate food waste for collection due to their nature, please detail the reason for this view, supplying evidence to justify your opinion.
7. To what extent do you agree that the measures we have proposed will increase the recycling of food waste from obligated businesses, public bodies, and other organisations? Please provide evidence to support your answer if possible.

- Strongly agree.
- Agree.
- Neither agree nor disagree.
- Disagree.
- Strongly disagree.
- No opinion.

Food waste is generally heavy/dense waste and therefore it does not take the presence of many employees to generate several kgs per week.

8. Are there any further measures that you would like to see included over and above our proposals that would improve the recycling of food waste by obligated businesses, public bodies, and other organisations? Please provide supporting evidence for any proposed measures.

Businesses, public bodies and organisations should be required to make an annual return to the Department stating who collects their food waste and where it is sent for treatment, with periodic audits.

Proposal 17: For separately collected food waste from businesses and the wider NHM sector, anaerobic digestion is our preferred method of treatment.

1. We propose that anaerobic digestion is the preferred method for treating separately collected food waste, where suitable, but composting is also permitted. Do you agree with this view?

- Yes
- No
- Unsure

If you disagree, please explain why you have this view and provide supporting evidence.

Proposal 18: Recyclables produced by businesses and the NHM sector should be collected separately from residual waste, and separately from each other, unless comparable quality is achieved through co-collection of materials beyond plastics and metals only, and separate collection is not technically feasible, incurs disproportionate economic costs or does not deliver the best environmental outcome; or if a permitted exemption to this requirement is set out in legislation.

1. Do you agree that obligated businesses, public bodies, and other organisations should be required to segregate each of the following dry recyclables for collection and recycling?

Core dry recyclable	Example	Yes, agree	No, disagree	Unsure/ no opinion
Separate glass bottles and containers	Including drinks bottles, condiment bottles, jars, etc.	X		
Separate Paper and card	Including newspaper, cardboard packaging, writing paper, etc.	X		
Separate Plastics and metals	Including drinks containers, detergent, shampoo and cleaning products, pots, tubs & trays, etc. Steel and aluminium tins and cans, including aerosols Drinks cartons (i.e., Tetrapak)	X		

2. Do you have any other comments to make on the separate collection of dry recycling from businesses and the NHM sector?

Proposal 19: Proposals on conditions where an exception may apply, and two or more recyclable waste streams may be collected together from businesses and the wider NHM sector, which would be required two years following a requirement in legislation to collect NHM recycling separately. In the interim, waste carriers would be encouraged to have regard to the principle of QualiTEE.

1. Please detail examples of technical challenges, with any supporting evidence, which you believe demonstrate that a separate collection of dry recyclables will not be feasible in circumstances for some or all NHM sector premises.

2. To make the case that separate collection does not deliver the best Environmental Outcome compared to the collection of recyclable waste streams together, do you agree that evidence on the overall impact of the management of the NHM sector waste stream should be provided on the measures listed but not limited to the following:

	Yes - agree	No disagree - please provide information as to why you disagree, providing clear evidence.	Unsure
Quantities of materials collected;	X		
Quantities of materials classed as contamination and not recycled;	X		
Quantities of materials lost from sorting processes at a MRF;	X		
Vehicle emissions from collection rounds;	X		
Vehicle emissions from bulk transportation to sorting and reprocessing both in NI and overseas;	X		

Rethinking Our Resources: Measures for Climate

Action and a Circular Economy in NI - March 2024 - Questions

	Yes - agree	No disagree - please provide information as to why you disagree, providing clear evidence.	Unsure
Emissions from disposal/ treatment including savings arising from landfill diversion; and	X		
Carbon savings from using recycled materials rather than virgin materials.	X		
Other factors to be added - please describe.			

3. Do you agree that the following evidence factors should be provided by a waste carrier to demonstrate that NHM sector recyclable materials are of comparable quality?

	Yes - agree	No disagree - please provide information as to why you disagree, providing clear evidence.	Unsure
Comparable quantities (+/-2%) of each material stream sent for closed loop recycling.	X		
Comparable quantities (+/- 5%) of each material stream sent for open loop recycling.	X		
Other factors to be added - please describe.			

4. Do you agree with the distance factor of more than 3 miles from another obligated NHM organisation, whereby collectors should not be required to collect recycling separately?

- Yes
- No
- Unsure**

If no, your response should include evidence as to why the distance factor is not appropriate and if relevant, supply information on an alternative distance.

Rethinking Our Resources: Measures for Climate

Action and a Circular Economy in NI - March 2024 - Questions

5. Do you agree that if the quantity of all core materials for collection is less than 3kg per week from one NHM organisation, then collectors should not be required to collect recycling separately?

- Yes
- No
- Unsure**

If no, your response should include evidence as to why the quantity is not appropriate and if relevant, supply information on an alternative amount.

6. Which is your preferred option for collectors when requested to collect recycling where the distance to an obligated NHM organisation is above 3 miles or where the quantity of all core materials is less than 3kg per week? Please rank your preference where 1 is most preferred:

Mixed recycling collections.	1.
Separate recycling collections using different coloured “survival sacks” which are collected in the same vehicle as residual waste, then managed apart from the residual waste after the vehicle tips off.	3.
No recycling collections required, and a collector could direct organisations to alternative facilities.	2.
Something else - please detail.	

7. Do you agree standard default values and data that have clearly referenced sources (that cover comparable Quality of materials, Environmental outcomes and Technical feasibility) which could be used to support a written assessment, would be useful?

- Yes
- No
- Unsure**

If you disagree, please provide the reason for your response.

Proposal 20: Written assessments should be completed by waste collectors that co-collect dry recyclables from NHM premises, evidencing why separate collections are not practicable and that co-collection delivers recyclable materials of comparable quality to those collected as separate fractions. Collectors must ensure that where they deviate from a standardised template, their output information attains the same evidential threshold. Regular reviews of such assessments should be undertaken to ensure that they remain accurate and up to date.

1. Where waste collectors do not collect dry recyclable waste in the permitted three segregated streams, do you agree that the collector should produce a written assessment based on the template shown in Appendix 3 to outline the exception (s) to the requirement?

Yes

No - further content should be added to the template.

No - content should be removed from the template.

Unsure

If you responded No, please provide the reason for your response below, including your suggested amendments to the template.

It should be the responsibility of the business to either complete the template or segregate their waste. Collectors will be reluctant to provide the service if it involves completing templates on behalf of customers. As councils are obligated to provide a commercial waste collection service on request, they may end up with all the customers with difficult storage arrangements.

2. Do you agree that reference to standard default values and data that have clearly referenced sources, which could be used to support a written assessment, would be useful?

Yes

No

Unsure

If you disagree, please provide the reason for your response with supporting evidence in the box below.

Rethinking Our Resources: Measures for Climate

Action and a Circular Economy in NI - March 2024 - Questions

121

3. Do you agree that waste carriers for NHM recycling should be encouraged to have regard to the principle of QualiTEE (and not required to conduct a written assessment) during the first two years following the introduction of legislation requiring separate NHM recycling collections?

Yes

No

Unsure

If no, please provide information as to why you disagree.

4. Do you agree with the recommendation that waste collectors should review and re-submit written assessments at least every 2 years?

Yes

No

Unsure

If you disagree, please select one of the following statements that best describes why:

Revising written assessments every 2 years is too frequent (please state how frequently you think they should be revised and evidence why).

Revising written assessments at least every 2 years is too infrequent (please state how frequently you think they should be revised and evidence why).

Written assessments should be revised every time changes are made to the collection services delivered by the waste collector or the treatment facility, they use i.e., collection methodology utilised, access to a new recycling facility.

Other (please detail providing evidence to support your opinion).

5. Using a template to produce a written assessment and using standardised data should reduce the burden on waste collectors. What other ways to reduce the burden on waste collectors should we consider for the written QualiTEE assessment?

If a significant administrative burden is placed on waste collectors, this will be reflected by a large increase in the costs of commercial waste collection services and as previously indicated, councils will end up with the difficult scenarios.

Rethinking Our Resources: Measures for Climate

Action and a Circular Economy in NI - March 2024 - Questions

122

6. Do you agree with the content of the written assessment template for collection of waste from obligated businesses, public bodies or other organisations as provided at Appendix 3?

- Yes
 No
 Unsure

If you disagree, please select any of the following that best describe why:

- Further content should be added (please comment).
 Content should be removed (please comment).
 Other (please comment).

Responsibility for completion of the template should rest with the waste producer and not the waste collector.

7. Do you have any other comments on the content for the written assessment template for non-household municipal collections?

No

8. We are proposing that a waste collector should only need to produce one written assessment for each set of premises or rurality that they intend to employ an exception for. For 'set of premises', we have suggested that this would include at a national level, groups of premises on a collection route or type of premises, for example hospitality premises. Do you agree with the examples listed for 'set of premises'?

- Yes
 No
 Unsure (please comment).

If you disagree, please select one of the following statements that best describes why:

- Other examples should be added to the list (please comment).
 Examples should be removed from the list (please comment).
 Other (please comment).

The duty should rest with the waste producer and not the waste collector. The requirement would have an educational purpose as many businesses have no understanding of the volumes (and weight) of waste they generate.

9. What other factors, if any, should be taken into consideration and included in the written assessment? For example, different premise type in a service/geographical area, costs of breaking existing contractual arrangements and/or access to treatment facilities.

It is unclear how commercial waste services, the majority of which are provided by the private sector will be policed to ensure compliance with the proposed measures and bearing in mind the limited data held on NI commercial waste arisings.

Proposal 21: To introduce, or where existing, improve NHM recycling collections.

1. Do you agree that the range of proposals set out by DAERA in this consultation once implemented, will sufficiently ensure that NHM recycling collections focus on segregating recyclable waste from residual waste alongside improving the quality and quantity of recycling?

- Yes
- No - If no, your response should include clear evidence as to why you have this.
- Unsure

Proposal 22: We will continue to review and investigate options to reduce costs for businesses and NHM premises where possible to maximise their recycling behaviour and activity.

1. What are the main barriers that obligated businesses (small and micro-firms in particular), public bodies and other organisations face when trying to recycle? Please select one option for each barrier listed.

	Major Barrier	Some Barrier	Little/No Barrier	No opinion
Financial		X		
Contractual			X	
Space	X			
Engagement		X		
Location		X		
Time and expense of staff training.		X		

Rethinking Our Resources: Measures for Climate

Action and a Circular Economy in NI - March 2024 - Questions

	Major Barrier	Some Barrier	Little/No Barrier	No opinion
Enforcement	X			
Lack of awareness or understanding of how to recycle more waste.	X			
Other				

Please provide further detail of these barriers and how you believe they can be overcome alongside any supporting evidence.

Business owners are often not present and low paid staff with no incentive or training are left to sort waste resulting in contamination issues. When contaminated bins are rightly left by the collection team, the owners expect the Council to rectify the issue with limited enforcement powers.

2. Which type(s) of business support do you believe would be most useful for obligated businesses, public bodies, and other organisations to ensure they understand their obligations and enable them to recycle more of their waste? (Select any number of responses).

	Very useful	Useful	Neutral	Not useful	No opinion
1:1 support provided/offered to obligated businesses and organisations.		X			
National, regional, or local communications campaigns.		X			
National guidance and good practice case studies.		X			
Dedicated website including online business support tools (e.g., online calculator and good practice guidance).		X			
Other (please specify). Ability to take enforcement action against businesses who persistently present contaminated waste. Translation services to help businesses owned by ethnic groups who struggle to understand instructions and guidance in English.					

Rethinking Our Resources: Measures for Climate

Action and a Circular Economy in NI - March 2024 - Questions

3. If adopted, and it became a legal requirement for obligated businesses, public bodies, and other organisations to segregate a core list of dry recyclables for collection alongside food waste, how do you believe such regulatory change should be promoted or communicated?

	Please tick all that apply
National, regional, and local communications campaigns i.e., TV adverts, social media campaigns, adverts in trade, national or local press, webinars.	X
Guidance and/or notification provided directly to all obligated businesses and organisations via the relevant regulatory bodies (local councils, NIEA) i.e., emails, written notification.	X
Guidance and/or notification provided to obligated businesses and organisations via their existing waste or recycling collector.	X
Guidance and/or notification provided to obligated businesses and organisations via relevant trade bodies or umbrella associations, Chambers of Commerce etc. i.e., newsletters, social media, workshops, conferences, or webinars.	X
Other (please specify).	

4. Do you have any views on how Government could support businesses, public bodies, or other organisations to procure waste management services more collaboratively?

	Tick all the options which you think should be considered
Promote existing collaborative opportunities relating to waste management so that businesses and NHM producers can access these easier.	
Develop new procurement framework opportunities for waste management services that businesses and NHM producers can use collaboratively to gain best value.	
Develop standard contract templates that businesses and NHM producers can utilise to collaboratively source waste management services.	
Collaborate with key industry organisations or accredited associations to develop waste management framework opportunities suitable to specific industry sectors i.e., transport, retail, hospitality.	
Other (please detail and provide examples if possible). Educate businesses that waste created by their activities is an intricate part of their business and dealing with it must be considered as part of their business model.	

Proposal 23: Businesses and the NHM sector will be provided with a minimum two-year notification of a statutory requirement to collect dry recyclables as separate streams, segregated from residual waste, with a further phasing of such legislative requirements for small and micro businesses producing NHM waste.

1. Do you agree with our proposal that will require the separate collection of the core set of dry recyclables within 24 months of notification of a statutory requirement?

Yes

No - If no, your response should include clear evidence as to which materials you consider should not be incorporated within the list and why. Evidence with justification to extend timescales should be provided, if appropriate.

Unsure

2. Do you agree that small and micro firms should be required to implement a separate collection of the core set of dry recyclables, by the points in time listed below? Tick the point in time which you think should apply.

	Yes	No	If you answered no, please provide the reason for your response with clear evidence detailing why small and micro firms need more time to accommodate the changes.	Not sure
24 months from notification of a statutory requirement.	<input checked="" type="checkbox"/>			
3 to 4 years from notification of a statutory requirement.				
More than 4 years from notification of statutory requirement.				
Never.				
Other - please detail.				

3. Are there any other obligated businesses, public bodies or other organisations in your opinion that should be exempt from the proposed requirements?

Please provide evidence to support your view.

4. Some waste collectors may not be able to collect the required dry recyclable streams from all obligated businesses, public bodies and other organisations within the timeframe proposed. In this table we set out some circumstances which may delay changes to dry recycling collections. Please select the circumstances which you believe will create challenges and provide evidence with justification detailing why timescales should be extended, as appropriate.

Not all rows need to be completed. Please use N/A where not applicable.	
Collection and treatment contract limitations.	N/A
MRF infrastructure and/or capacity.	N/A
Container procurement and distribution challenges.	N/A
Reprocessing availability.	N/A
End market volatility/lack of end markets.	X
Cost burdens to collectors of setting up new or expanded collection services.	N/A
Other - please describe.	

Proposal 24: To review collection zoning and franchising to reduce costs to businesses and NHM premises.

1. Which recyclable waste streams do you believe should be included under a potential franchising/zoning scheme available for use by obligated businesses, public bodies, and other organisations?

For each option, please select whether you agree, disagree, or are not sure/do not have an opinion/not applicable.

	Agree	Disagree	Not sure/No opinion/Not applicable.	No opinion
Dry recyclable material streams (glass, metal, plastic, paper, and card).			X	
Food Waste.	X			
Other Items, for example oils, hazardous waste, bulky waste (please specify).			X	

2. Which of the below options, if any, is your preferred for zoning and/or collaborative procurement? Please select only one option that most closely aligns with your preference.

- Encouraging two neighbouring businesses to share the same containers under a contract.
- Encouraging businesses to use shared facilities at a site/estate or equivalent.
- Business Improvement Districts/partnerships tendering to offer a preferential rate (opt-in).
- Co-collection - the contractor for household collection services also delivers the NHM service.
- Framework zoning - shortlist of suppliers licensed to offer services in the zone.
- Material specific zoning - one contractor collects food waste, one dry recyclables, one residual waste.
- Exclusive service zoning - one contractor delivers the core recycling and residual collection waste services for the zone.
- None of the above.
- Other (please detail)

Rethinking Our Resources: Measures for Climate

Action and a Circular Economy in NI - March 2024 - Questions

▪

3. Do you have any views on the roles of stakeholders in implementing a potential zoning/franchising scheme. Please tick where you think the named stakeholder should have a role in each of the following activities:

	DAERA	NIEA	Councils	Business Improvement Districts	Environmental Non-Governmental Organisations	Waste producers i.e., businesses, public bodies etc	Trade body, Umbrella Associations, Accredited bodies	Other - please detail
Procurement of services.						X		
Scheme/collection service design.			X			X		Private waste Mgt companies
Admin and day to day management.						X		
Enforcement (ensuring zoning rules are adhered to).		X						
Business support/advice.	X	X	X				X	Private waste Mgt companies
Development of tools & guidance.	X		X					
Delivery of communications campaigns.	X	X						
Other activities (please detail).								

4. If you think that there is a role for any other stakeholders not already listed, please name the stakeholder below and state what activities you believe they should be involved in.

As many small businesses already use the private sector for their commercial waste collections, they will have an important role in ensuring suitable collection arrangements can be put in place.

5. Do you have any further views on how a potential waste or recycling collection franchising or zoning scheme could be implemented?

It is probable that such a scheme will face a legal challenge under procurement legislation if public bodies are involved in establishing it.

Proposal 25: To establish commercial waste bring sites and/or to increase the access to HWRCs for businesses, public bodies, and other organisations to encourage more recycling and better waste management.

1. Do you agree that obligated businesses, public bodies, and other organisations would find the provision of commercial waste bring sites useful to facilitate an increase in recycling?

X No

If you disagree, please explain why you have this view and provide supporting evidence.

Unmanned Bring Sites would attract fly tipping and contamination. Some small businesses already abuse street litter bins to dispose of commercial waste and also try to pass it off as household waste at HWRCs.

2. Are there any barriers which we should be aware of, regarding the creation and operation of commercial waste bring sites?

- Lack of suitable location(s) to accommodate commercial waste bring sites.
- Access restrictions - time, availability, vehicular access, noise.
- Risk of abuse which may cause recycling containers to fill up quickly.
- Risk of contamination to recyclables meaning collected materials are less likely to be recycled.
- Sites encourage fly-tipping or litter.
- Other (please specify).

3. Do you agree that obligated businesses, public bodies, and other organisations should be permitted to use HWRC's to dispose of their waste or recyclables?

No, most existing sites were not designed to handle large volumes of commercial waste.

If you disagree, please detail the reason for this view, supplying evidence to justify your opinion.

If you agree, what benefits do you believe access to HWRCs will provide to obligated businesses, public bodies, or other organisations? (Select as many benefits as are appropriate)

- HWRC access will provide a trusted, legitimate disposal route for our waste and recyclables.
- HWRC access will provide a cost-effective disposal route for our waste and recyclables.
- HWRCs will provide access to disposal routes for our waste and recyclables at times which suit our organisation (in line with the opening hours of the facility).
- HWRC access will enable us to recycle more of our waste due to the range of accepted materials.
- Other (please specify).

4. Are there any barriers, which we should be aware of, should HWRCs be made accessible to obligated businesses, public bodies, and other organisations?

- HWRC network has limited capacity for waste or recyclable storage - would be unable to accept predicted increase in volumes.
- Council(s) has/have insufficient resources to handle the anticipated increase in numbers of visits, waste volumes, payments or permits needed to cope with acceptance of commercial waste or recyclables.
- Existing Environmental Permit or planning condition for HWRC network would not permit a service expansion.
- Other (please specify).

It would increase the likelihood of disputes, abuse of HWRC staff and arguments over the origin of waste – commercial -v- household. Councils have a long history of trying to restrict commercial

waste with limited legislative powers. Certain businesses will go to great lengths to avoid commercial waste charges.

Proposal 26: Amendments will be made to Article 5 of The Waste and Contaminated Land (Northern Ireland) Order 1997 to ensure compliance with the post-consultation requirements to segregate a core set of dry recyclables and food waste by obligated businesses and the wider NHM sector.

1. Do you agree that our proposal to extend Article 5 of the Waste & Contaminated Land (NI) Order 1997 will be sufficient to ensure compliance with the proposed requirements to segregate a core set of dry recyclables and food waste by obligated businesses, public bodies, and other organisations?

- Yes
- No
- Unsure

If you disagree, please explain why you have this view and provide supporting evidence.

There is no indication as to how the proposals will be audited and enforced, with it applying to 100s of obligated businesses, the vast majority of whom have no concept of what is required by them.

2. Do you agree that the existing penalty of £300 for non-compliance for obligated businesses, public bodies and other organisations is severe enough to ensure compliance?

- Yes
- No
- Unsure

If you have answered No, what value do you feel the fixed penalty notice for non-compliance should be increased to?

Proposed new penalty value	Please select one answer
£400	
£500	
£600	
£700	

If you believe another value should apply to fixed penalty notices for non-compliance, please specify the value you feel the fixed penalty should be set at and explain why, as well as providing

Rethinking Our Resources: Measures for Climate

Action and a Circular Economy in NI - March 2024 - Questions

supporting evidence.

Resources and Waste Strategy Team
Environmental Resources Policy Division
Department of Agriculture, Environment & Rural Affairs
Jubilee House
111 Ballykelly Road
Ballykelly
BT49 9HP

Email: wastepolicyteam@daera-ni.gov.uk



Department of
**Agriculture, Environment
and Rural Affairs**

www.daera-ni.gov.uk

INVESTORS IN PEOPLE®
We invest in people Standard

Unclassified

136

ITEM 10**Ards and North Down Borough Council**

Report Classification	Unclassified
Exemption Reason	Not Applicable
Council/Committee	Environment Committee
Date of Meeting	12 June 2024
Responsible Director	Director of Environment
Responsible Head of Service	Head of Waste and Cleansing Services
Date of Report	03 June 2024
File Reference	72010
Legislation	Waste and Contaminated Land (NI) Order 1997
Section 75 Compliant	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Other <input type="checkbox"/> If other, please add comment below:
Subject	ANDBC Waste Resource Management Performance Review 2015-2023
Attachments	None

1.0 Background

Nine years into the life of Ards and North Down Borough Council April 2015, and with just under 6 years until the 70% recycling target laid down in the Climate Change Act (Northern Ireland) 2022, the purpose of this report is to set out a strategic review of our sustainable waste resource management performance.

1.1 Strategic Significance

Waste disposal costs represent one of the Council's single biggest categories of expenditure and therefore has a very significant impact upon our ratepayers. Secondly, this aspect of service delivery hugely impacts the standard of our environmental governance. Thirdly, waste management is one of, if not the most, heavily regulated of all Council functions; some of the most significant of our statutory duties are listed below.

Not Applicable

137

- Section 25 of the Northern Ireland (Miscellaneous Provisions) Act 2006 – duty to promote the achievement of sustainable development in the exercise of our functions.
- The Waste and Contaminated Land (NI) Order 1997 and The Waste Regulations (NI) 2011 – duties to apply the waste hierarchy priorities when planning our waste collection and disposal services.
- The Climate Change Act (NI) 2022 establishes a waste recycling target of 70%, to be achieved by 2023.

1.2 Strategic Prioritisation

For the financial, environmental and statutory reasons set out above, when Ards and North Down Borough Council came into existence in 2015, 'Sustainable Waste Resource Management' was quickly identified and agreed by the new Council as a key strategic corporate priority. In November 2015, the Council approved a Sustainable Waste Resource Management Strategy position, which:

- Set out the challenges ahead,
- Identified the potential rewards accruing from more sustainable waste resource management outcomes,
- Plotted a roadmap of key service development proposals; and
- Established a headline key recycling target of 70% to be achieved by 2030 (this visionary target was agreed by ANDBC some 7 years before it was eventually enshrined in the NI Climate Change Act).

The challenge for the new ANDBC Council was probably one of the most significant facing any NI Council. The combined municipal waste recycling rate for the two legacy Councils in the last year of their existence (2014/15) was 40.6%, below the then NI average of 41.4% and some 30% below our new target of 70%.

2.0 Transformation of Waste Management Services

2.1 Service Transformation Initiatives Already Implemented

Immediately after agreeing its strategic approach towards more sustainable waste resource management outcomes, the Council embarked upon a visionary and ambitious programme of structural waste management services' re-design. The following programme of key service transformations have been progressed:

- New Food Waste Recycling Service (Dec 2015)
- Expansion of Blue Bins Recyclables Range (April 2016)
- New Kerbside Glass Collection Service (June 2017)
- HRC Access Permit System for Vans and Large Trailers (January 2018)
- New Kerbside Trade and Schools Waste Recycling Collection Service
- Rules for General Access and Use of HRCs (December 2022)
- HRC Online Access Booking System (September 2023)

Not Applicable

138

- **Food Waste Recycling**

December 2015 – roll out of new food waste kerbside recycling collection service, involving a ban on any organic food waste being placed into grey bins and provision of kitchen food waste caddies and compostable food caddy liners to every home to support convenient and easy collection and transfer of all household food waste into green and brown wheeled bins for composting.

Landfilled food waste leads to very significant greenhouse gas emissions and represents the biggest category of household waste by weight. It was therefore identified as the number one strategic waste resource management priority by the Council due to its impact both financially and environmentally, and the relative scale of potential recycling rate improvement to be gained by capture of food waste through our household recycling services.



- **Expansion of Blue Bin Recyclables Range**

April 2016 – implementation of newly negotiated contractual arrangements for the processing of mixed dry recyclables that are accepted into blue bins. This expanded the range of kerbside recyclable plastics packaging from just plastic bottles, to a very wide and comprehensive range of all shapes, sizes and colours of plastic pots, tubs, trays and containers.

This type of packaging waste is vast in variety and scale, and the Council identified as an early priority the need to capture such materials for recycling as part of the kerbside recycling collections service - and do so in a way that was as all-encompassing and least confusing as possible to householders.

Not Applicable



• **New Kerbside Glass Collection Service**

June 2017 – implementation of a new kerbside collection service to every home for recycling of all types of glass bottles and jars, involving provision of collection caddies to all homes. Whilst glass recycling banks had long been available at a number of locations around the Borough, Council was aware that utilisation of such facilities was somewhat limited across the community and much glass waste was still going into the grey bins. Moreover, glass is 100% and endlessly recyclable, and the glass recycling process is highly energy efficient compared to glass manufacture from raw materials.

Due to the relative simplicity of the glass recycling message, and the prevalence and weight of this material in the household waste stream, it was identified as an early strategic service transformation target.

Important changes to your household bin collection service

Dear Householder,

Following our recent and very successful campaign to remove food waste from grey bins, requirements for how we dispose of ALL recyclable household waste have now changed.

What's changed?

- All glass bottles and jars (of every shape, size and colour) **must** now be placed in a new **glass collection box** that is currently being delivered to every home; they must no longer be placed in the grey bin.
- All recyclable paper/card, plastics and metals **must** now be placed in the **blue bin** for collection every two weeks. The range of recyclable waste items that must now go into the blue bin has been greatly expanded - please check the guide provided along with this letter or use the free Bin-ovation recycling app for full details.
- **Only** non-recyclable waste items **must** now be placed in your **grey bin**.

Not Applicable

140

- **HRC Access Permit System for Vans and Large Trailers**

January 2018 – implementation of a new permit system for access to Household Recycling Centres using vans or large trailers. This was identified as a strategic priority due to the relatively large amount of both total and landfill waste being received into our Household Recycling Centres, with the associated negative financial and recycling rate impacts. Council identified the abuse of our HRCs for trade/business waste purposes as a primary contributor, with this most closely linked to access by vans and large trailers.

- **New Kerbside Trade and Schools Waste Recycling Collection Service**

April 2019 – implementation of a new kerbside recycling collection service to all trade and schools' customers, that matched the kerbside recycling service delivered to residents. Prior to this most trade waste collected was landfilled, and the transformation of the trade and schools' waste service was implemented to ensure a consistent and sustainable approach was adopted across the entirety of the Council's waste management operations. The transformation included a move to free recycling collections for all of the Borough's schools, aimed at incentivizing and promoting engagement and education of our children on the subject.



- **Rules for General Access and Use of HRCs**

December 2022 – implementation of strict rules around general access and use of HRCs, involving a requirement to show ID proving residency in the Borough and an obligation to use sites appropriately for 'recycling' as opposed to mere waste 'disposal' (e.g. separation of recyclable waste, ban on placing bags of mixed waste in landfill skips).

This move was precipitated by a period of significant deterioration in the Council's Borough recycling rate (both in absolute terms and relative to other Councils' recycling rates) during and post Covid. Inappropriate use of our

Not Applicable

HRCs for both out of Borough and trade/business waste as well as a deterioration in the level of general recycling engagement by residents at sites, were identified as the key contributory factors. At its worst point, Council was receiving almost 60% more HRC waste per capita than the average for other NI Councils and received the same amount of HRC landfill waste as Belfast City Council, despite BCC having more than twice our population.



- **HRC Online Access Booking System**

September 2023 – implementation of an online booking system (supported by access to telephone booking where required), for general access into HRCs. This system which is now extensively used by many Councils across the UK, was introduced to consolidate and sustain the implementation and ongoing effectiveness of the site access and use rules that had been agreed and commenced in December 2022. Its primary purpose is to ensure that only household and in-Borough waste is allowed into sites and that waste is routinely more effectively segregated for recycling.



2.2 Planned Future Service Transformation Initiatives

Council is currently either working towards the implementation of additional new waste management service transformation initiatives or is planning such measures in the near future, with the aim of delivering further step change improvements in our Borough recycling rate towards the 70% target identified for 2030.

Not Applicable

- **New Kerbside Textile Recycling Collections Service**

This has already been agreed by Council, and new combined glass and textile collections vehicles have recently been procured to replace our original glass only collection vehicles which had reached the end of their working life. Detailed service implementation planning is in progress with the hope of commencing the new kerbside textile recycling service later in this financial year, although a recent slump in the textiles recycling market may necessitate a delay in this.

- **Kerbside Bin Collections Review**

Council has agreed to a comprehensive review of its kerbside bin collections model, with the aim of ensuring that the configuration of bin collections for different waste streams is optimized to produce the best possible recycling outcomes.

This review, being led by a cross party group of Elected Members, is already well under way. It is anticipated that a review report will be brought to the Environment Committee as early as possible this year, with proposals for a way forward.





- **HRC Estate Review**

Council has agreed to a full review of its HRC estate, looking at the design and location of HRC sites to ensure that there is a capital plan in place to upgrade its network of facilities in a way that will optimize sustainable waste resource management outcomes. It is anticipated that a draft high level strategy paper will be brought to Committee after the summer, with proposals for a way forward on this agenda.

3.0 Sustainable Waste Management Service Performance Outcomes

3.1 Financial, Environmental and Statutory

The following table summarises our performance progress over the past 9 years in relation to key financial, environmental and recycling rate outcome criteria – benchmarked against data for 2014/15, after which the two legacy Councils were merged under Local Government Reform.

	2014/15	2023/24	Change
Annual Landfill Disposal Tonnage	52350	32687*	 19663 (38%)
Annual Municipal Recycling Rate %	40.6	55.5	 14.9%
Annual Tonnage of CO ₂ equivalent Greenhouse Gas Emissions from Landfill	15,700	9,800	 5900
Landfill CO ₂ equivalent Greenhouse Gas Emissions Equivalent to	7400	4600	 2800

Not Applicable

Emissions from No. of Average Cars			
Annual Land Disposal Cost @ Present Gate Fee and Landfill Tax Rate	£6.8M	£4.3M	↓ £2.5M
Annual Landfill Disposal Cost @ Present Gate Fess and New Landfill Tax Rate from April 2025	£8M	£5M	↓ £3M

* Rolling 12-month period (Jan – Dec 23)

Worthy of highlighting is the fact that were Council still landfilling the same amount of municipal waste as we were in 2014/15, this would represent an additional annual landfill cost burden of £2.5M at current gate fee and landfill tax rates.

The tables below illustrate how the position has changed since 2014/15 in ANDBC compared to the average for other Councils, in respect of several key sustainable waste resource management indicators:

- The total amount of municipal waste generated.
- The amount of residual waste disposal (i.e. waste either landfilled or otherwise disposed of in ways that are not accredited as reuse or recycling).
- The municipal recycling rate.

	Total Municipal Waste Tonnage 2014/15	Total Municipal Waste Tonnage 2023/24*	Change	Residual Waste Tonnage 2014/15 (Not Reused or Recycled)	Residual Waste Tonnage 2023/24* (Not Reused or Recycled)	Change
ANDBC	96,193	84,244	↓ 12.4%	57,139	37,489	↓ 34.4%
All Other NI Councils	855,230	909,597	↑ 6.4%	501,165	449,341	↓ 10.3%

*Rolling 12-month period (Jan 23 – Dec 23)

	Municipal Waste Recycling Rate % 2014/15	Municipal Waste Recycling Rate % 2023/24*	Change
ANDBC	40.6	55.5	↑ 14.9%
All NI Councils	41.4	50.6	↑ 9.2%

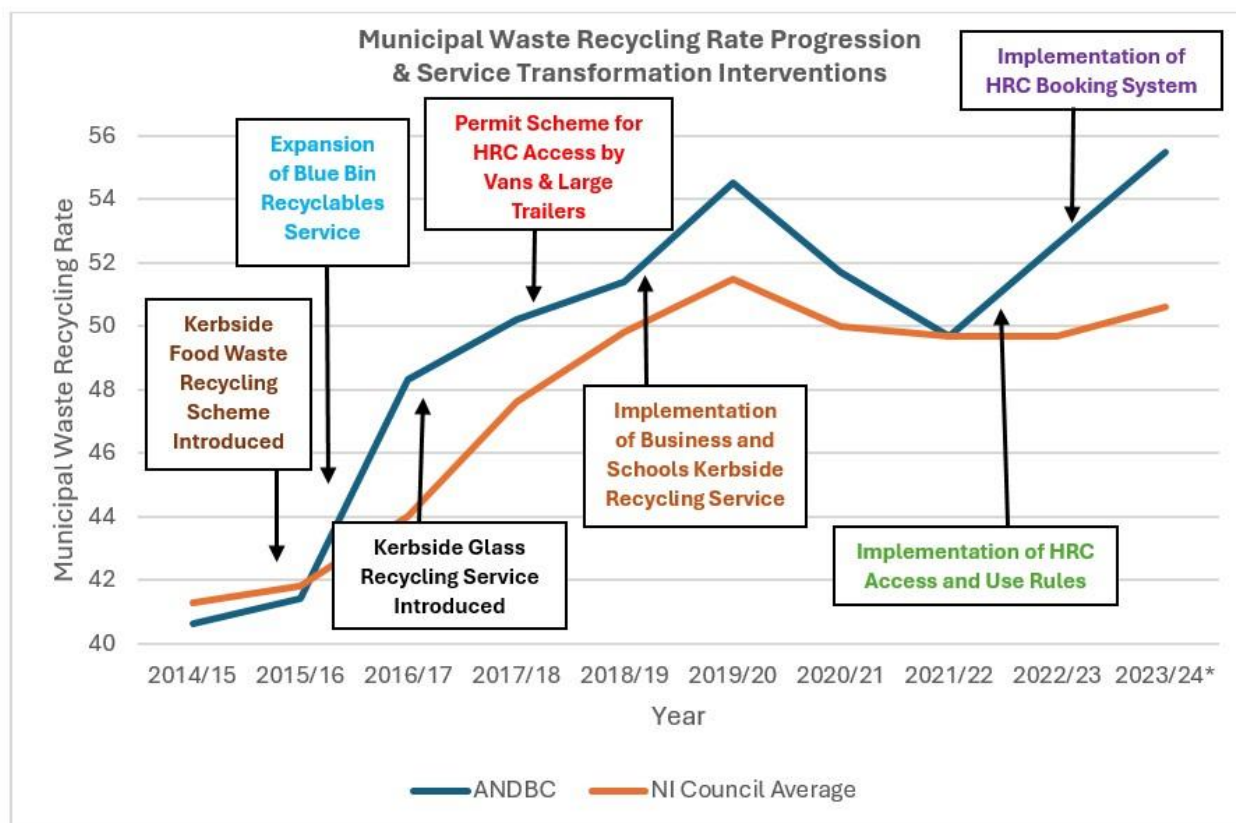
*Rolling 12-month period (Jan 23 – Dec 23)

Not Applicable

The data in these two tables is key to understanding the extent to which our Council has improved its sustainable waste management outcomes over the past 9 years since local government reform, both in absolute terms and relative to the average performance of other Councils in NI.

3.2 Impact of Service Transformation Initiatives on Outcomes

The chart below illustrates the change in our municipal recycling rate year by year, as each of our waste service transformation initiatives have been implemented. The chart clearly illustrates the correlation between each significant service transformation initiative, and the Borough’s Municipal Waste Recycling Rate.



*Rolling 12 months (Jan – Dec 2023)

4.0 Summary and Conclusion

This report provides an important strategic overview of the very significant progress made by ANDBC over the past 9 years since the new Council was created in 2015. Our sustainable waste management performance has been positive overall, both in absolute and relative terms, and the outcomes achieved are patently a product of the strategic approach adopted by the Council from the outset – with each planned service transformation initiative leading directly to successive step changes in our recycling rate (with associated positive financial and environmental outcomes).

Not Applicable

145

Notwithstanding the above, it is clear from this review that:

- a. We cannot be complacent, as our recycling progress did suffer a significant reversal for a period, as indicated in the chart above. This demonstrates that we cannot take continued upward momentum in performance for granted, and Council must prioritise continuous monitoring and review of its sustainable waste management service outcomes – with corrective actions taken where these are not in line with expectations or requirements.
- b. Further significant step change improvements in our sustainable waste management outcomes are still required to propel us towards the target of a 70% recycling rate by 2030. We have improved our rate by almost 15% over the past 9 years and now have almost 6 more years until 2030 to increase that rate by a further 15%. Officers believe that this is achievable; there is precedent, with some other UK Councils having already reached 70% and indeed more locally the former Banbridge District Council achieved a rate of almost 61% back in 2014/15 just prior to Local Government Reform when the NI Council average rate was then just 41%.

Our consolidation of the service transformation initiatives we have already implemented, with further refinement where possible to secure even better outcomes from these, plus determined progression of the planned further service development initiatives, provides the best opportunity to reach our 70% recycling goal by 2030. The Council is fortunate to have an excellent, dedicated and enthusiastic team of officers and staff across our Waste and Cleansing Services Department, whose efforts have contributed significantly to the progress we have already made and stand ready to similarly support the challenges ahead.

It is worth concluding this report by highlighting that landfill tax is scheduled to rise very steeply in April 2025, by 21.6%. Even at our existing levels of landfill disposal, which as highlighted in this report have been reduced significantly since 2014/15, it is projected that this rise would equate to an extra annual landfill tax burden of over £³/₄ M. This adds an even greater financial imperative to our sustainable waste resource management agenda.

RECOMMENDATION

It is recommended that Council note this report.

Unclassified

146

ITEM 11**Ards and North Down Borough Council**

Report Classification	Unclassified
Council/Committee	Environment Committee
Date of Meeting	12 June 2024
Responsible Director	Director of Environment
Responsible Head of Service	Head of Regulatory Services (Temporary)
Date of Report	29 May 2024
File Reference	LQR / 90100
Legislation	
Section 75 Compliant	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Other <input type="checkbox"/> If other, please add comment below: If other, please add comment below:
Subject	Q2 & Q3 Licensing Activity Report (July to Dec 2023)
Attachments	None

1.0 Introduction

The information provided in this report covers, unless otherwise stated, the period from **1 July to 31 December 2023**. The aim of the report is to provide members with details of some of the key activities of the Licensing Service, the range of services it provides along with details of level of performance.

2.0 Applications Received

The Service deals with a wide range of licensing functions which require the officers to consult with the PSNI, NIFRS and a range of other internal Council Sections in making their assessment of an application.

Unclassified

147

	Period of Report July – December 23	Same period last year July – December 22
Entertainment Licence	88	25
Cinema Licence	0	0
Amusement Permits	4	0
Marriage and Civil Partnership Place Approval	1	3
Pavement Café Licence	8	7
Street Trading Licence	0	1
Lottery Permits	5	1

Most of the licences issued are for renewals and hence the workload is constant year on year. Renewing a licence still entails considerable work to assess the application and consult with the other bodies.

3.0 Regulatory Approvals

This is the number of licences, approvals and permits that have been processed and issued.

	Period of Report July – December 23	Same period last year July – December 22
Entertainment Licence	60	4
Cinema Licence	0	0
Amusement Permits	5	0
Marriage and Civil Partnership Place Approval	2	2
Pavement Café Licence	15	8
Street Trading Licence	1	3
Lottery Permits	0	2

4.0 Inspections

The service carries out a range of inspections in connection with the grant and renewal of licences to establish if the premises are suitable. In some cases, they inspect with the NIFRS.

During performance inspections are an important element in ensuring the licensees are abiding by their licence terms and conditions and that they are safe for patrons.

Unclassified

148

	Period of Report July – December 23	Same period last year July – December 22
Initial/ renewal Entertainment Licence Inspections	57	31
During performance Inspections	50	24
Initial Inspections of Street Cafes	0	0
Initial Inspections of Places of Marriage and Civil part.	0	1
High Hedges Site Investigations	14	16

The Service has an annual planned programme of ‘during performance inspections’ which concentrates on the higher risk premises such as night clubs through the year.

5.0 CCTV incidents

Period: 1 July 2023 to 31 December 2023

Date	Location	Incident	Action
5 July	Newtownards	Traffic accident	Recorded for PSNI
13 July	Bangor	Persons fighting	Noted
28 July	Bangor	Persons fighting	Noted
26 July	Newtownards	Criminal damage	Recorded for PSNI
3 Aug	Bangor	Traffic accident	Recorded for PSNI
12 Aug	Bangor	Assault	Recorded for PSNI
26 Aug	Bangor	Persons fighting	Noted
8 Sept	Bangor	Persons fighting	Noted

Unclassified

149

20 Sept	Bangor	Persons fighting	Noted
3 Oct	Bangor	Criminal damage	Recorded for PSNI
11 Oct	Bangor	Persons fighting	Noted
19 Oct	Newtownards	Persons fighting	Noted
13 Nov	Bangor	Assault	Recorded for PSNI
18 Nov	Bangor	Drink driving	Recorded for PSNI
6 Dec	Bangor	Criminal damage	Recorded for PSNI
14 Dec	Newtownards	Traffic accident	Footage provided
10 Dec	Bangor	Assault	Footage provided
27 Dec	Bangor	Assault	Recorded for PSNI

6.0 Off Street Car Parking

The Council currently operates 22 pay and display car parks in Bangor, Holywood and Newtownards. Ticket sales and usage have not returned to date to pre Covid levels.

Table 1: Income from Ticket Sales

	Period of Report	Previous year
Income from ticket sales	£390,373	£297,761

Table 2: PCN's Issued

	Period of Report	Previous year
Bangor	764	704
Holywood	622	686
Newtownards	798	740
Total	2184	2030

RECOMMENDATION

It is recommended that the Council notes the report.

Unclassified

150

ITEM 12**Ards and North Down Borough Council**

Report Classification	Unclassified
Exemption Reason	Not Applicable
Council/Committee	Environment Committee
Date of Meeting	12 June 2024
Responsible Director	Director of Environment
Responsible Head of Service	Head of Regulatory Services (Temporary)
Date of Report	30 May 2024
File Reference	90505
Legislation	The High Hedges Act (Northern Ireland) 2011
Section 75 Compliant	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Other <input type="checkbox"/> If other, please add comment below:
Subject	High Hedge Legislation Implementation
Attachments	Guidance for Complainants

The Council previously requested an update on the working of the High Hedges Act 2011.

Background

The Act is intended to help persons secure reasonable enjoyment of their property in respect of the loss of light caused by a 'hedge' growing in an adjoining property.

Whilst there is an ultimate legal sanction that the Council can impose, the aim of the legislation is to resolve problems through mediation.

In determining if the Act can help a property owner the hedge must first meet specified rules set out in the Act:

- the hedge (or the portion of the hedge that is causing problems) must be made up of a line of two or more trees or shrubs, and

Not Applicable

151

- it is mostly evergreen shrubs or trees, and
- it is more than two metres above ground level on the hedge owner's side; and
- It is causing a loss of light to the property.

If the hedge meets these requirements, then there may be a cause for complaint.

The process

It should be noted that this is normally a long process.

1. Persons who consider that they are affected by a High Hedge should speak in the first instance with the Licensing Services for advice. This advice will be verbal and relating to the above questions and the application process. Officers will not call or inspect the hedge at this stage. A copy of the Council Guidance will be forwarded. Copy attached.
2. The complainant will also be advised of the need for them to take reasonable steps to resolve the matter with the hedge owner and record those interactions. This could take up to a year.
3. If they believe that the hedge meets the definition of a high hedge and they have had a period of interaction with the hedge owner then the complainant can make a formal complaint to the Council. They must also pay the fee of £360.
4. The Council will check the application and review the evidence provided regarding their actions to resolve the complaint.
5. If it is considered that there has been insufficient action taken to resolve the matter the application will be refused and the fee returned.
6. If the complaint is accepted the hedge owner will be contacted and asked for their comments. Once these are received and reviewed arrangements will be made to assess the problem hedge and undertake measurements etc.
7. If the inspection does not agree that there is a loss of light then the complaint will be closed and part of the fee returned.
8. If it is agreed that there is a loss of light then an assessment of the reduced height of the hedge will be calculated.
9. If the reduction is more than one third of the height of the hedge the Council will seek the advice of a tree surgeon. The Council cannot reduce the height unless it is satisfied that the hedge will survive.
10. If it is likely that a Remedial Notice should be served, then the Officers will attempt to mediate with both parties. If the matter is resolved, then part of the fee is returned and no further action is required.
11. If mediation fails, then a Remedial Notice will be issued against the hedge owner.
12. The Notice will explain the reasons for the Notice and the height that the hedge needs to be reduced to. It will also set the timescale for the action to be taken.
13. The hedge owner can appeal to the Lands Tribunal.
14. The full fee is refunded to the complainant and recharged to the hedge owner.
15. The Council can subsequently prosecute the hedge owner for failing to

Not Applicable

152

comply with the Remedial Notice.

Action taken 2023/24

Number of general enquiries: 51

Number of formal complaints received: 4

Number refunded: 2

RECOMMENDATION

It is recommended that the Council notes the report.



**Ards and
North Down**
Borough Council

**HIGH HEDGES ACT
(NORTHERN IRELAND) 2011 –
GUIDANCE FOR
COMPLAINANTS**

For further information please contact

Licensing & Regulatory Services Department

**Ards and North Down Borough Council
2 Church Street
Newtownards
BT23 4AP**

Tel: 0300 013 3333

email: licensingandregulatoryservicesteam@ardsandnorthdown.gov.uk

HOW CAN YOU DEAL WITH A HIGH HEDGE PROBLEM?

Guidance and Advice for COMPLAINANTS

The right hedge can be an enhancement to a garden but the wrong hedge may bring problems.

Use this guide to help you:

- understand what can be done to resolve hedge problems informally;**
- understand what a council's responsibilities are if a high hedge complaint is lodged with it under the High Hedges Act (Northern Ireland) 2011; and**
- understand what is - and importantly what is not - covered by the legislation.**

This is intended to be a straightforward guide - not a statement of the law.

Introduction

You do not normally need permission to plant a hedge in your garden and there are no laws that limit the height you can grow your hedge. Nor is it an offence for a hedge of any particular height or species (variety) to be grown. Planning law¹ that governs the height of boundary walls and fences does not apply to hedges.

Problems can however occur if a hedge is allowed to grow unchecked, particularly without considering its effect on neighbours. If you have an issue about a neighbour's hedge, it is best to talk to them about it and to try and sort things out amicably.

Common law rights entitle neighbours to cut overhanging branches back to the boundary line (unless other legal restrictions, such as a tree preservation order, apply), but require you to offer the return of cut foliage to the owner. These common law rights do not extend to reducing the height of a hedge without the owner's agreement.

Responsible hedge owners² look after any hedge on their property and make sure it is not a nuisance to anyone else. This normally means trimming the hedge regularly, both its top and all sides and ensuring that it does not pose a danger to people or property. In addition, **Roads Service³ can require trees or hedges blocking sightlines to be cut back.**

The High Hedges Act (Northern Ireland) 2011 provides a legal basis for taking action over a problem high hedge. The legislation will help people in Northern Ireland who are adversely affected by high hedges bordering their domestic property. It deals with evergreen and semi-evergreen hedges that are more than 2-metres in height and affecting light reaching a neighbouring domestic property. It introduces a formal complaints system that will be operated by local councils, but it should only be used as a **last resort** as neighbours are

¹ The Planning (General Development) Order (Northern Ireland) 1993

² The term 'hedge owner' means 'every owner and every occupier of the neighbouring land', a term used in the High Hedges Act (Northern Ireland) 2011

³ The Roads (Northern Ireland) Order 1993 (Article 50)

encouraged to resolve the problem themselves.

The legislation will not mean that all hedges above 2-metres in height will need to be cut down. Nor will people need council permission to grow or retain a hedge along the boundary of their property. Councils will only intervene in circumstances where a complaint is made. Even then, each case will be determined on its own merits.

A complaint cannot be made about single trees or single shrubs, whatever their size. In addition, the High Hedges Act excludes areas of forest or woodland (greater than 0.2 hectares in area).

The Act **only** applies to problems experienced because the hedge is too tall. The problems that will be considered include obstruction of daylight and sunlight, jointly or as separate issues. Loss of view or satellite signals cannot be considered.

What can be done before resorting to a formal complaint?

Before deciding to make a formal complaint to your local council, you need to be sure that the hedge meets the criteria outlined in the High Hedges legislation.

The hedge must:

- act as a barrier to light;
- be formed wholly or predominantly by a line of 2 or more evergreen or semi-evergreen trees or shrubs; and
- rise to a height of more than 2 metres above ground level.

You also need to try to resolve the problem with your neighbour as the council may reject your complaint if you can't demonstrate that you have tried to sort out the problem yourself.

What is a High Hedge?

A high hedge is defined in the Act as so much of a barrier to light as is formed wholly or predominantly by a line of two or more evergreen or semi-evergreen trees or shrubs and rises to a height of more than 2 metres above ground level. But, for these purposes, a line of evergreens or semi-evergreens is not to be regarded as forming a barrier to light if gaps significantly affect its overall effect as such a barrier at heights of more than 2 metres above ground level.

When considering whether a particular hedge can be the subject of a complaint under the Act, you should ask yourself the following series of questions:

- is the hedge - or the portion that is causing problems - made up of a line of 2 or more trees or shrubs;
- is it mostly evergreen or semi-evergreen;
- is it more than 2 metres above ground level;
- even though there are gaps in the foliage or between the trees, is the hedge still capable of obstructing light?

If the answer to all these questions is 'yes', then it is likely to be a high hedge for the purposes of the Act.

It is not necessary for the whole of the hedge to fall within the definition. If some parts of it qualify, they can be considered as individual hedges under the Act.

The following additional information might help when you are considering the answers to the questions set out above.

Line of two or more trees or shrubs

A complaint cannot be made under the Act about single trees or shrubs, whatever their size. A tree or shrub that has multiple stems, all growing from the same trunk or root plate, remains a single tree or shrub and so falls outside the scope of the Act. This is the position even though the multiple stems might result in a considerable spread.

The 2 or more trees or shrubs do not have to form a straight line. As long as they are roughly in line, they will be caught. A group of trees forming a woodland area of 0.2 hectares or more is specifically excluded from the Act. The area of 0.2 hectares only relates to an area of **woodland**. It **does not** relate to the area of a garden or the area occupied by a long single line of trees.

Mostly evergreen or semi-evergreen

The Act applies not only to Leyland cypress or conifers but also includes other evergreen trees or shrubs, such as laurel. It does not include climbing plants, such as ivy, or bamboo - which is classed as a grass.

The term semi-evergreen is not separately defined in the Act but normally means that the hedge retains some live foliage throughout the year. Depending on geographical location, the trees and shrubs may drop their leaves in cold winters but retain them in mild winters.

Deciduous trees lose all their living leaves during part of the year, thus Beech hedges are excluded. Although they may retain some foliage for most of the year, this is brown and dead.

Reference works such as Hillier Gardener's Guide to Trees and Shrubs or the RHS A-Z Encyclopedia of Garden Plants may help to clarify whether particular trees and shrubs are classed as evergreen, semi-evergreen or deciduous.

A hedge does not have to be only evergreen or semi-evergreen trees or shrubs. The Act applies to hedges that are predominantly evergreen or semi-

evergreen. Whether a particular hedge is mostly evergreen or semi-evergreen is a matter of judgement. It does not necessarily require a set number or proportion of the trees or shrubs in the hedge to meet this description. Evergreen or semi-evergreen hedges that include some deciduous species will fall within the scope of the definition in the Act. Thus deciduous trees that are located within a predominantly evergreen hedge might be the subject of a complaint under the Act.

More than 2 metres above ground level

The 2 metres should be measured from the ground where the hedge is growing - that will usually be on the hedge owner's side. Even if the property affected is on a lower (or higher) level than the land where the hedge is situated, the 2 metres should still be measured from the ground where the hedge is growing. This is in line with planning requirements for a wall.

For these purposes, ground level means the natural level of the ground where the hedge is situated. Normally, therefore, any measurements should be taken from the ground at the base of the trunks or stems of the trees or shrubs in the hedge. An exception might be where the hedge has been planted on a mound, or in a bed or other container that is raised above the ground. In such a case, the measurement should be from the natural ground rather than of the hedge alone.

In order for a complainant to make a complaint about a high hedge, it should be sufficient for them to estimate of the height of the hedge in order to determine whether or not the hedge falls under the scope of the Act. Neither the legislation nor the guidance suggests that the complainant should enter a neighbour's land to take any measurements – this will be the responsibility of the council if a formal complaint is made.

When a council is investigating a high hedge complaint, it will need to measure the height of the hedge on the complainant's side to assess the impact on the complainant's property. It will also need to confirm that the height of the hedge is more than 2-metres which is likely to necessitate measurements on the hedge owner's side, depending on the specific

circumstances and also to ensure that any remedial action does not require the hedge to be reduced below 2 metres on the land where it is growing.

Barrier to light

The Act applies to hedges that, despite any gaps that occur above the 2 metre mark, act as a barrier to light. This is about the physical appearance of the trees and shrubs in question - and whether or not they form what we might commonly consider to be a hedge. Only what they look like above 2 metres counts. This is consistent with the fact that complaints cannot be brought against 2 metre high hedges. It effectively takes anything below this height outside the scope of the Act.

Whether a particular hedge meets this criterion is a matter of judgement, depending on its composition, form, growth habit, and past management. The key question is whether - even though there might be gaps in the foliage or between the trees or shrubs - the hedge is capable of obstructing light.

The trees or shrubs in the hedge may have been closely planted and become so entangled that they appear as a solid green wall. In such circumstances, the matter is straightforward: the hedge is evidently capable of blocking light. Other cases may be more difficult to judge. The trees or shrubs may be more widely spaced so their branches are not touching. Branches might have fallen off or been removed so the canopy is lifted. Or the growth might be straggly and foliage sparse. Such cases must be assessed individually, on their particular merits. But, if individual trees or shrubs are so widely spaced, or the gaps in the foliage are so extensive, that it is possible to see what lies behind them, then the hedge might fall outside the Act.

If someone were to remove every other tree from their hedge, whether or not it would still be caught under the definition would depend on what the hedge looks like afterwards. If, despite any gaps, the hedge still acts as a barrier to light; and it comprises wholly or predominantly a line of 2 or more evergreen or semi-evergreen trees or shrubs; and it is over 2 metres high - then it would meet the definition of a high hedge. If separate parts of the hedge meet the definition, they could be considered as individual hedge.

Location of the Hedge

The Act says that the hedge must be on land that is owned by someone other than the complainant. Otherwise, there is no restriction on where the hedge is situated. It is the effect of the hedge on a domestic property that is important, rather than where it is located.

Although the Act describes where the hedge is growing as "neighbouring land", the use of the word neighbouring has no special significance here. In particular, the hedge does not have to be next door. It could, in theory, be several gardens down the road. Though, in practice, the farther away a hedge is, the less its impact and the less chance that a complaint will be successful. Nor does the hedge have to be wholly on a neighbour's property. It could extend over several properties.

In addition, the problem hedge does not have to be growing in someone else's garden. It could, for instance, be on parkland that backs onto a garden or yard, or on commercial premises.

Crown land

The Act applies to Crown land. This means that Councils are able to investigate and determine complaints about high hedges on land owned by the Crown. For example, a hedge on land owned by a Government Department might be adversely affecting neighbouring domestic property. The Crown itself is not liable to prosecution under the Act, though its employees might be.

Affected Property

You can bring a complaint under the Act if a domestic property is affected. The Act defines domestic property as a dwelling or any associated garden or yard. And it defines dwelling as any building or part of a building occupied, or intended to be occupied, as a separate dwelling.

This would exclude properties that might be in a residential area but wholly occupied by, say, a dental practice or other commercial use.

A complaint could not be brought under the Act if a hedge was affecting a garage, barn, shed or other outbuilding that might be used for storage or for purposes other than as living accommodation.

Where a property contains a mix of domestic and commercial uses, the Act would apply to protect the living quarters from the effects of a neighbouring high hedge.

Sometimes the division between domestic and commercial elements will be clear, e.g. the doctor's surgery that operates out of an extension to a home, or the flat above a shop or pub. In such cases, a complaint could be brought under the Act only if the doctor's home or the flat over the shop or pub were adversely affected.

Where the boundaries between the business and living quarters are more blurred, the question of whether or not a complaint may be brought under the legislation will turn on the facts of the particular case.

A garden or yard does not have to be attached to the dwelling, as long as it is linked - legally rather than physically - with a domestic property e.g. a split property with a garden on the other side of a road.

Reasonable attempts to resolve the problem

Before you contact your neighbour, be clear in your own mind about what you think the problem is, how it affects you and what you want done. When arranging a time to discuss the problem with the hedge-owner, allow them some time to think about your concerns. It's better to speak face-to-face rather than just pushing a note through the door. You could try inviting them to see the hedge from your side – it may help them to understand the problem. You should keep a record of these discussions as this will form part of the evidence that you will need to provide to the council if you need to make a formal complaint.

Write to the hedge-owner

If you decide to write to the hedge-owner, think carefully about what you write – you may like to include a description of the problems caused by the hedge and how it affects you; don't be rude or abusive. Put yourself in the hedge-owner's position and think how you would feel if you received the letter; write or type the letter neatly – a scrappy note pushed through the door suggests that you don't really care. Again, you should keep records of any correspondence.

Mediation

If the hedge-owner refuses to either talk or correspond with you, you may wish to consider the use of mediation. You could ask a community representative or a mutual acquaintance to intervene or alternatively, you can ask for the help of an independent mediator, although there may be a cost associated with this. The mediator's job is not to make a decision but to help the people concerned to understand each other's point of view, without apportioning blame. Annex A provides further information on mediation services.

You will need to keep a record of your attempts to resolve the issue because in the event of you subsequently having to lodge a formal complaint with the council, you will be required to provide evidence of having tried unsuccessfully to resolve the matter with your neighbour.

Who can make a complaint?

You can bring a complaint to the council if a hedge is adversely affecting the reasonable enjoyment of your property due acting as a barrier to light. Grounds of complaint must, therefore, relate to the impact of the hedge on your property, i.e. home and garden (see paragraph – Affected Property – Page 8).

The reference to "reasonable" enjoyment of the property is significant. It affects the way that councils will determine complaints. It requires them to:

- Assess the impact of the hedge, acting as a barrier to light, on the enjoyment that a person might expect from their home and garden, thereby introducing a degree of objectivity to the decision-making process. This may differ from the complainant's expectations. For example, the complainant might attach particular importance and weight to the loss of winter sunlight. The council, however, will have regard to what is a reasonable amount of sunlight for people to get in their property at this time of year. It will also take into account the fact that the effect lasts for a limited time;
- Consider what is reasonable in the circumstances. This means they must take account of all relevant factors, including the opinions of the complainant and hedge owner and the contribution that the hedge makes to the wider amenity of the area. They will not look solely at the complainant's concerns. They must look at each case on its particular merits. A problem that leads to the issue of a remedial notice in one complaint might not necessarily produce the same outcome in another case - because of the different circumstances.

Potential complainants should have regard to these points in framing their grounds of complaint and substantiating their case. You must be able to demonstrate that you have tried unsuccessfully to resolve the problem with your neighbour. If there is insufficient evidence that you have taken all reasonable steps to resolve the problem, the council may reject your complaint. It may also reject your complaint if it believes that it is frivolous (not serious) or vexatious (intended to harass).

Owner/Occupier Responsibility

A complaint can be made by the owner or occupier of the affected property. Where there is both an owner and an occupier (e.g. landlord and tenant), each is entitled to complain to the council, although only one complaint is required to start the formal council process.

You do not have to live at the address for a set period before you can make a complaint, although it is unlikely that you would be in a position to complain to the council shortly after occupying or taking ownership of a property since you would need to have some experience of the adverse effects of the high hedge and to have attempted to arrive at a solution with your neighbour.

Although the Act does not require an occupier (e.g. tenant) to get permission from the owner of their property before making a complaint, this could be a condition in the tenancy agreement. You should, therefore, check the terms of any such agreement before getting in touch with the council.

Even if there is no requirement to obtain the property owner's consent, it is good practice for the occupier to inform them before a complaint is submitted to the council. This is important as the owner may have already complained. This is particularly important if someone is occupying a property for only a short time - especially where the owner is temporarily absent and intends to return to the property.

There is provision for the owner of an empty property to bring a complaint to a council. They might, for example, have moved out but be unable to sell the house because of the impact of the high hedge.

Making a formal Complaint

If you feel that you have made every effort to resolve the problem, without any success, you may wish to consider making a formal complaint to your local council. **You will be required to demonstrate the steps that you have taken.**

You must contact your local council to obtain a High Hedge Complaints Form and to find out how much you will be required to pay to have your complaint investigated.

You should complete all parts of the High Hedge Complaint Form, available from your local council, and return it with the appropriate fee. The fee to make complaints will be determined by your local council. The complainant

pays for a service provided by the council and the fee is justified on the grounds of recovering the council's costs. But you will get a refund if the remedial notice issued by the council takes effect.

You must provide as much supporting information as possible, as your local council will require evidence that you have tried to solve the problem before it can investigate your complaint.

In the case of vacant land, you should take reasonable steps to identify the owner of the land and these steps should be recorded on the complaints form before it is submitted to the council. Land and Property Services should be contacted to find out if the land is registered. Companies House may be able to provide information on land owned by a business. In exceptional circumstances, ownerless property, under common law, passes to the Crown. The Treasury Solicitor, on behalf of the Crown, administers the estates of people who die intestate or without known kin and collects the assets of dissolved companies and failed trusts. Further information is on their website at www.bonavacantia.gov.uk. As a general rule, the Treasury Solicitor does not undertake any management responsibilities in respect of properties that it holds.

If you need help to complete the form, you could contact your local Citizens Advice Bureau or other community support service. Your local council cannot help you to complete the form.

A copy of the Complaint Form should be sent to the Hedge Owner/ Occupier at the same time it is submitted to the council.

Fees

Complaints fee

Local councils can charge a fee for administering a high hedge complaint. The maximum fee that can be charged is specified in the High Hedges (Fee) Regulations (Northern Ireland) 2012. Your complaint must be accompanied by the appropriate fee and you should contact your council to find out what this fee is.

Refund of fees

If a council investigates your complaint, issues a remedial notice requiring action to deal with the height of the hedge and that remedial notice then takes effect (after any appeals have been decided), the council will refund the fee that you paid.

Fee transfer

When a remedial notice takes effect i.e. after any appeals have been determined and the council has refunded your fee, the council can then levy a fee on the 'hedge owner' for the investigation and administration costs arising as a result of a complaint under the High Hedges Act. The fee transfer mechanism is laid out in the High Hedges (Fee Transfer) Regulations (Northern Ireland) 2012.

What can the council do?

The role of the council is to act as an independent and impartial third party. It will **not** negotiate or mediate but will adjudicate on whether the hedge, by forming a barrier to light, is adversely affecting the reasonable enjoyment of your property. In doing so, it will take account of all views and relevant factors - including the hedge-owner's amenity and that of the wider neighbourhood. Each case will be assessed on its particular merits.

The council will not deal with complaints made about roots of trees, single trees, woodlands 0.2 hectares or more in area or deciduous hedges under this legislation. **The council will consider whether or not the hedge meets the criteria of the High Hedges Act.**

If the council decides to investigate the complaint it will write to everyone who owns and occupies the land where the hedge is situated, notifying them formally that it is considering a complaint about their hedge. As you should have sent them a copy of the complaint form at the same time as the complaint was submitted to the council, its approach should not come as a surprise.

After the exchange of representations has been completed, the council should normally arrange to visit the site. This enables the officer dealing with the case to see the hedge and surroundings at first hand, so that the written information and evidence already provided can be considered properly. The purpose of the visit is not to facilitate mediation or negotiation between the people in dispute, and so there should be no discussion of the merits of the complaint.

Where a visit is required, the council must give at least 24 hours notice of the intended entry to all occupiers of the land and should be prepared to produce - if asked - evidence of authority to enter the land in question.

If it thinks it is justified, the council may issue a remedial notice requiring the hedge owner to remedy the problem by, for example, reducing the height of the hedge and maintaining it at the lower level. The notice is binding on the owner or occupier of the land where the hedge is situated.

The remedial notice will include the following information:

- a description of the hedge it relates to and where it is situated;
- a statement that a complaint has been made to the council about the hedge and that the council has decided that the height of the hedge is adversely affecting the complainant's reasonable

enjoyment of their property;

- the property affected by the hedge (full postal address and any local 'town-land', if applicable);
- what action must be taken in relation to the hedge in order to remedy the adverse effect and, if necessary, to prevent it recurring ("initial action") and by when ("the compliance period");
- further action, if any, that is required to prevent longer-term recurrence of the adverse effect ("preventative action");
- the date the notice takes effect ("the operative date"); and
- the consequences of failure to comply with the requirements of the notice.

The council can only require works to the hedge that address any problem it is causing and cannot require the hedge to be removed. The council may also reject your complaint if it feels that the hedge falls outside the scope of the legislation.

If a council decides to issue a remedial notice and this notice takes effect (after any appeals have been processed) you will have your complaints fee refunded (if the council charged you a fee for investigating the complaint).

The council will provide you with a copy of all the papers relating to the case, including the decision notice and remedial notice.

Legal and environmental factors to be considered when a council is assessing a complaint

When deciding the contents of a remedial notice, the council must consider any relevant legal or environmental issues:

Protected trees

When considering a high hedge complaint, the council will need to know if

any trees that form part of the hedge are protected, either by a tree preservation order or because they are in a conservation area. The Local Planning Office⁴ must normally give consent before any work can be carried out on protected trees. Further advice on assessing and weighing the issues is given in the Planning Information Leaflet 4: Tree Preservation Orders⁵.

Planning conditions

Some hedges must be retained under the terms of a condition attached to a planning permission. Planning conditions can be removed or varied only by making an application under section 28 of the Planning (Northern Ireland) Order 1991.

Historic, wildlife and landscape value

Councils must also take account of other factors such as:

- whether the hedge is part of or within the boundaries of a listed building, registered park or garden or other site of archaeological or historic importance and the effect that any removal may have on the said site;
- whether it has historic associations or contains veteran trees;
- whether it is situated in an Area of Outstanding Natural Beauty, or forms an important link with other landscape features;
- whether it is within a designated nature conservation site such as an Area of Special Scientific Interest⁶;
- whether any protected birds, animals or plants are present in the

⁴ This responsibility will pass to local councils when the relevant parts of the Planning Act (Northern Ireland) 2011 are commenced

⁵ For further information see www.planningni.gov.uk/index/advice/advice_leaflets/leaflet04.htm

⁶ See the Environment (Northern Ireland) Order 2002

hedge⁷ and how they would be affected by any works, having regard not only to relevant legislation but also to local Biodiversity Action Plan policies;

- whether appropriate advice has been taken to ensure that the proposed remedial action will not result in the hedge dying; or
- the potentially seasonal nature of the work since hedge cutting should be avoided during the bird nesting season (March – August) if birds are nesting in the hedge.

Covenants

Some properties have legal covenants that stipulate the size or type of hedge that can be grown. They might, for example, require that a hedge is kept tall in order to provide a screen or shelter. These are private rights or restrictions which are normally enforceable through the civil courts.

The terms of a covenant could, nevertheless, be relevant to a complaint, though they would not necessarily be decisive: it is possible that other factors, including the wider public interest, could have greater weight and importance. How long ago the restriction was introduced, its original purpose and whether circumstances remain the same could be material in considering the continuing relevance of any covenant.

Farm hedges

Hedgerows are a characteristic feature of the landscape and many form field boundaries which are valuable for wildlife, attractive in the landscape and are an important part of our heritage. If a problem hedge is on farm land which may be subject to Cross-Compliance requirements (aimed at protecting nesting birds and securing a supply of food for a range of wildlife), the council should discuss the matter with countryside management staff at the local DARD office before deciding the contents of a remedial notice, particularly in relation to the timescale within which the

⁷ See the Wildlife and Natural Environment Act (Northern Ireland) 2011, the Conservation (Natural Habitats etc) Regulations (Northern Ireland) 1995 and the Wildlife (NI) Order 1985

remedial works should be completed.

How do I appeal against the council's decision?

You can appeal against a council's decision to the Northern Ireland Valuation Tribunal. Specific guidance on the appeals process can be found in the High Hedges Act (Northern Ireland) 2011 – Guide to Appeals.

Any appeal should be made on the High Hedges Appeals Form (available from the Northern Ireland Valuation Tribunal) and should be accompanied by the appropriate fee. Before you appeal, you should consider carefully the reasons for the council's decision.

If you decide to appeal, the Northern Ireland Valuation Tribunal will review the case file with all relevant documentation and may also visit the site to view the hedge and assess its impact.

There is no specific right of appeal against a council's decision that a complaint is invalid. If you consider that the council has not applied the legislation correctly, you can refer the matter to the council's own complaints procedures or to the Northern Ireland Ombudsman. It is possible in certain circumstances to make an application to the High Court for a judicial review. Such a review is about whether the council has applied the law properly by adhering to the proper procedures.

Annex A

Citizens Advice Bureaux give free, confidential, impartial and independent advice on a range of subjects and may be able to put you in touch with their local community mediation service or help you in your dealings with the hedge-owner. They also run an online advice guide containing up-to-date and practical information, at www.adviceguide.org.uk. You can locate your nearest Citizens Advice Bureau through this site, as well as through the local telephone directory.

Further information about local community mediation services can be found on the **Mediation UK** website at www.mediationuk.org.uk.

The **Directory of UK Mediation** on the ADRNow website at www.adrnow.org.uk can also help you to find a mediator in your area.

Mediation Northern Ireland can put you in touch with a trained mediator in your area:

e-mail: info@mediationnorthernireland.org,

website: www.mediationnorthernireland.org