

Agenda

1.0 Apologies

2.0 Declaration of Interests

- (i) conflict of interest on any matter before the meeting (Members to confirm the specific item)
- (ii) pecuniary or non-pecuniary interest (Member to complete disclosure of interest form)

3.0 Report by the Acting Head of Service (Waste Management and Operational Services)

3.1 Consultation on Call for Evidence on Reforming the Producer Responsibility System for Waste Electric and Electronic Equipment (WEEE)

For Decision

📄 *Item 3.1 W&OS - WEEE Consultation Report.pdf* *Page 1*

📄 *Item 3.1 W&OS - Appendix 1 - WEEE Consultation L&CCC Draft Response.pdf* *Page 3*

📄 *Item 3.1 W&OS - Appendix 2 - WEEE Call For Evidence L&CCC Draft Response.pdf* *Page 20*

4.0 Report by the Acting Head of Service (Environmental Health, Risk and Emergency Planning)

4.1 LCCC - Updated Air Quality Action Plan (2024)

For Noting

📄 *Item 4.1 - Report- AQAP FINAL V3.pdf* *Page 31*

📄 *Item 4.1 - Appendix 1 EH - Air Quality Action Plan FINAL V2.pdf* *Page 33*

5.0 Confidential Report from the Acting Director of Environmental Services

All items are confidential due to containing information relating to the financial or business affairs of any particular person (including the Council holding that information)

5.1 arc21 Provision of Services for the Receipt, Storage and Transfer of Municipal Waste Tender

📄 *REDACTED 2 Transfer Station Tender Report.pdf* *Page 69*

5.2 Tender for the Provision of a Haulage Service for Residual and Green Wastes from Council Household Recycling Centres (Ref STA23/24-040)

📄 *REDACTED STA2324_040 Confidential Report - Haulage of Residual Green Waste 03 2024.pdf*

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6.0 Any Other Business

Committee:	Environment and Sustainability
Date:	6th March 2024
Report from:	Acting Head of Waste Management & Operations

Item for:	Decision
Subject:	Consultation and Call for Evidence on reforming the Producer Responsibility System for Waste Electrical and Electronic Equipment (WEEE)

1.0 Background and Key Issues

A Consultation and Call for Evidence on reforming the Producer Responsibility System for Waste Electrical and Electronic Equipment (WEEE) was issued on 28th December 2023 with a closing date of 7th March 2024. The March Environment and Sustainability Committee was granted delegated authority to consider and approve the draft responses for submission.

A proposed L&CCC response for both the Consultation and the Call for Evidence has been compiled for consideration and approval and are attached at **Appendix 1** (Consultation on reforming the producer responsibility system for waste electrical and electronic equipment, L&CCC Draft Response) and **Appendix 2** (Call for evidence on reforming the producer responsibility system for waste electrical and electronic equipment, L&CCC Draft Response).

Consultation on reforming the producer responsibility system for waste electrical and electronic equipment. Key Points

This consultation includes the proposed introduction of a household waste collection service for both small and bulky WEEE to be financed by producers of WEEE, with a proposed implementation date of 2026. It also proposes the introduction of obligations for sellers of electrical goods to take away old appliances at no charge when delivering replacement appliances. Obligations on the producers of vapes are proposed to finance recycling costs when these products become waste, as is creating a discrete WEEE category for waste vapes.

These proposals could have significant operational implications for local authorities depending on how they are actually delivered. While the proposals are based on the assumption that in many cases partnerships with local authorities are likely to be the most cost effective and efficient way for producers to fulfil their obligations, local authorities will not be mandated to provide a separate collection of WEEE, and other service providers can be considered by the proposed producer led Scheme Administrator. There is an assumption that in order to deliver a small WEEE kerbside collection service, local authorities will be able to retrofit refuse collection vehicles with cages to facilitate this collection.

In addition, potential changes to WEEE collections may alter the flow and volumes of WEEE at Household Recycling Centres (HRC's), and strengthening take back obligations for retailers could reduce the amount taken to HRC's and therefore impact on Council reported recycling rates.

	<p>Call for evidence on reforming the producer responsibility system for waste electrical and electronic equipment. Key Points</p> <p>Many of the issues addressed in the call for evidence relate to the allocation of targets for the WEEE producer compliance scheme or ask for evidence that the Council does not have information to inform. Responses have been provided to questions where applicable.</p>	
2.0	<p><u>Recommendation</u></p> <p>It is recommended that Members:</p> <ul style="list-style-type: none"> • Approve the L&CCC draft response to the ‘Consultation on reforming the producer responsibility system for waste electrical and electronic equipment’ for submission. • Approve the L&CCC draft response to the ‘Call for evidence on reforming the producer responsibility system for waste electrical and electronic equipment’ for submission. 	
3.0	<p><u>Finance and Resource Implications</u></p> <p>As these are consultation documents it is not possible to quantify finance and resource implications at this stage. There is the potential for Council to receive financing for kerbside collections of both small and large WEEE from producers of WEEE but more work would be required in order to ensure full cost recovery associated with this approach, if adopted, to include back office, capital and revenue costs associated with delivery of enhanced kerbside collections, particularly in the case of small WEEE.</p>	
4.0	<p><u>Equality/Good Relations and Rural Needs Impact Assessments</u></p>	
4.1	Has an equality and good relations screening been carried out?	No
4.2	<p>Brief summary of the key issues identified and proposed mitigating actions <u>or</u> rationale why the screening was not carried out</p> <p>This is a third party consultation response and not an internal document.</p>	
4.3	Has a Rural Needs Impact Assessment (RNIA) been completed?	No
4.4	<p>Brief summary of the key issues identified and proposed mitigating actions <u>or</u> rationale why the screening was not carried out.</p> <p>This is a third party consultation response and not an internal document.</p>	

Appendices:	<p>Appendix 1: Consultation on reforming the producer responsibility system for waste electrical and electronic equipment. L&CCC Draft Response</p> <p>Appendix 2: Call for evidence on reforming the producer responsibility system for waste electrical and electronic equipment. L&CCC Draft Response</p>
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Consultation on reforming the producer responsibility system for waste electrical and electronic equipment

L&CCC Draft Response

Questions about you

1. What is your name?

Noeleen O'Malley

2. What is your email address?

Noeleen.omalley@lisburncastlereagh.gov.uk

3. Which of the following best describes you?

Local government

4. Would you like your response to be confidential?

No

5. If you answered 'Yes' to question 4, please briefly explain why you require your response to be confidential

N/A

Increasing collections of waste electrical and electronic equipment from households

6. Do you agree or disagree that producers (and distributors that do not provide their own take-back services for electric and electronic goods) should finance collections of small WEEE (for example, toasters, small toys and tools), from households? Please select one of the following options:

a. Agree

b. Disagree

c. Unsure

7. Please provide evidence any evidence you have to support your answer to question 6.

If producers are not obligated to finance collection of small WEEE from households there will be no motivating factor to increase these collections. At present Local Authorities through bulky waste collections for large WEEE and in some instances kerbside collections for small WEEE are effectively subsidising the collection of this waste stream. Given continued pressures on Council budgets and the ethos of the 'producer pays principle' it is only fair that producers who profit from the manufacture of electrical equipment are responsible for covering costs associated with its subsequent collection, treatment and disposal.

In some cases the general public can find it difficult to access WEEE recycling points, so it is anticipated that the convenience of having a collection on their doorstep will encourage more recycling of WEEE and reduce the amount that is being placed into the residual bin, contaminating other recycling streams, being littered or being fly-tipped.

Consideration will also have to be given as to how collection of increased volumes of WEEE will impact on WEEE reprocessing facilities to ensure there is adequate capacity to process additional volumes of recyclable WEEE collected. There will also have to be consideration of access to such facilities and the regional implications of the same.

There is also the question of who will provide the collections. The consultation suggests that the decision of who provides the kerbside collections will be left to WEEE producers. If Local Authorities are involved in collections there will be issues associated with capacity at HRC's, potential need for additional infrastructure to enable bulking and onward transport of WEEE etc. If collections are provided by a third party, clarification is needed on whether Local Authorities would still be required to provide storage space within their HRCs. Not only would this require research into the amount of space available but would also require an arrangement to be put in place between the third party and the Local Authority to ensure that Local Authorities are fully reimbursed for the costs of storage.

8. Recognising the need to balance frequency of service with efficiency, what frequency should a WEEE collection round be provided? Please select one of the following options:

- a. Weekly
- b. Fortnightly
- c. Monthly
- d. On demand

Do not know

9. Please provide any evidence you have to support your answer to question 8.

Depends on a number of factors, and a one size fits all approach may not work.

If producers consider appointing, through contract, local authorities to deliver a kerbside collection service of small WEEE, collection frequency would likely be determined by the kerbside collection system already adopted by the authority in question. LA's currently have different collection methods in place for dry recycling so if small WEEE were to be co-collected with this waste stream there could be differences in approach and frequency. There would also need to be consideration given to the suitability of this as a collection method e.g. for comingled collections can WEEE be added to other dry recycling and co-collected, if so does this raise greater risk/insurance issues around insurance industry concerns regarding WEEE/batteries and fires at processing facilities etc. In a kerbside sort collection if WEEE is sharp or damaged/broken does this present a manual handling issue etc.

Local Authorities also offer varying frequencies of residual waste collection – if residual waste collection vehicles were for example retrofitted with WEEE cages a simple message of 'present WEEE alongside residual waste' could be delivered but there would still be a variation in frequencies of collection between local authority areas. There would also need to be consideration given to the

suitability of this as a collection method e.g. can vehicles be retrofitted to enable simultaneous WEEE and residual waste collection, would the collection of WEEE negatively impact on existing residual waste collection round sizes, insurance issues around co-collection of WEEE, different points of deposit for WEEE and residual waste collected on the same vehicle, insurance industry concerns regarding WEEE/batteries and fires at processing facilities etc.

Any on demand system would need to be responsive enough whereby the public do not revert to residual waste disposal due to unacceptably long waiting times for collection or a complicated system that is difficult to access. Equally delivering a service on a very frequent basis e.g. weekly could have unforeseen environmental detriments with large numbers of stand-alone vehicles travelling weekly routes to collect relatively small volumes of WEEE.

10. Would there be benefit in providing for different arrangements to apply in different areas according to circumstances, for example, on demand in some areas and regular collection round in others? Please provide any evidence you have to support your answer.

There will be issues associated with rurality. There will also be issues associated with dovetailing into existing local authority collection, should this avenue become the preferred option. Not all local authorities may wish to offer a kerbside collection service even if it is funded by producers therefore there could be a scenario whereby the private sector delivered services in some areas and LA's in others.

Any material collected at the kerbside, particularly electronic goods, does not lend itself to the potential for reuse or repair due to the presentation of material, which is usually outdoors exposed to the elements for a period of time. There is also the issue around how WEEE is collected in vehicle cages and then contained in skip-type containers and uncovered areas. This is a suitable method for recycling purposes, but if producers are looking for quality and integrity to be maintained to maximise the reuse potential, take-back and drop-off points would be more suited to collection.

11. What should items qualifying for this service be defined by:

a. Weight

b. Dimension

It might be easier to define qualification by item type. Weight and volume measurements might not mean a lot to the average householder however it is easy to understand an item type such as mobile phone, laptop, toaster etc.

12. Please specify any products that, due to their properties, should be excluded from the small WEEE household collection service. Please provide evidence to support your answer.

Products containing Lithium Ion type batteries (e.g. laptops, mobile phones) raise concerns from a collection perspective. These batteries are currently a concern to the waste management industry due to issues with combustion of damaged batteries. This has led to concerns and difficulties regarding insurance for materials transfer, bulking and treatment/disposal facilities. If small WEEE were to be collected at kerbside additional insurance issues could also arise with regards to fleet insurance.

Lightbulbs, glass or ceramic appliances and items such as deep fat fryers that may contain food and oil.

13. For any products listed in response to question 12, what measures should be put in place to drive up levels of their separate collection to minimise disposal in residual waste?

Engagement with the Insurance industry to address concerns.

Lightbulbs – information needs to be provided to residents on how they can be recycled within their local area on a ‘bring’ basis.

Items that could have food residue in – deep fat fryers etc – residents need to be informed that these need to be empty and clean when placing out for recycling.

14. Do you agree or disagree that producers (and distributors that do not provide their own take-back services) should finance collection of large WEEE? Please select one of the following options:

a. Agree

b. Disagree

c. Unsure

15. Please provide any evidence you have to support your answer to question 14.

If producers are not obligated to finance collection of large WEEE from households there will be no motivating factor to increase these collections. Most Councils offer a bulky waste collection, some free of charge and some chargeable however either way Councils are currently covering the cost of collection of such items. This is both unfair and unsustainable as budgetary pressures become more pronounced. Councils should not be subsidizing the collection of any WEEE.

Given continued pressures on Council budgets and the ethos of the ‘producer pays principle’ it is only fair that producers who profit from the manufacture of electrical equipment are responsible for covering costs associated with its subsequent collection, treatment and disposal.

In some cases, the general public can find it difficult to access WEEE recycling points, so it is anticipated that the convenience of having a collection on their doorstep will encourage more recycling of WEEE and reduce the amount that is being placed into the residual bin, contaminating other recycling streams, being littered or being fly-tipped.

Consideration will also have to be given as to how collection of increased volumes of WEEE will impact on WEEE reprocessing facilities to ensure there is adequate capacity to process additional volumes of recyclable WEEE collected. There will also have to be consideration of access to such facilities and the regional implications of the same.

There is also the question of who will provide the collections. The consultation suggests that the decision of who provides the kerbside collections will be left to the retailers. If Local Authorities are involved in collections there will be issues associated with capacity at HRC’s, potential need for additional infrastructure to enable bulking and onward transport of WEEE etc. If collections are provided by a third party, clarification is needed on whether Local Authorities would still be required to provide storage space within their HRCs. Not only would this require research into the amount of space available but would also require an arrangement to be put in place between the third party and the Local Authority to ensure that Local Authorities are fully reimbursed for the costs of storage.

16. Do you agree or disagree that a producer-led Scheme Administrator, approved by government, is best placed to determine the most practical and efficient delivery mechanism to manage producer obligations to finance small and large WEEE collections from households? Please select one of the following options:

- a. Agree
- b. Disagree
- c. Unsure

17. Please provide any evidence you have to support your answer to question 16.

While we agree that a Scheme Administrator, approved by government, is best placed to determine the most practical and efficient delivery mechanism to manage producer obligations to finance small and large WEEE collections from households we also note that there will be no requirement mandated on Local Authorities to separately collect WEEE. The costs and benefits analysis associated with the consultation has however assumed that a producer led scheme administrator would seek to deliver the service by integration with exiting kerbside collection services provided by Local Authorities. There is however a question as to if all Local Authorities would want to become involved in such collections.

A producer led Scheme Administrator could be best placed to determine how producers should finance small and large WEEE collections however the same body would not have the expertise necessary to determine what on the ground delivery mechanisms would deliver the best outcomes to all interested parties, including householders and service delivery partners whether this be through the private sector or local authorities. More thought will have to be given to relationships between any Scheme Administrator and whoever they appoint to deliver WEEE collections on the ground.

Additionally, if Local Authorities are not part of the network put in place by the Scheme Administrator for collecting WEEE there will still need to be consideration given and financial provision made for covering the costs of WEEE that ends up in the household waste stream as residual waste.

An independent SA may be better placed to ensure the process remains objective and fair and represents the interests of all stakeholders.

18. Do you agree or disagree that the most efficient and cost-effective delivery of the obligation to provide a regular household collection service for small WEEE and bulky waste collections for large WEEE is likely to be achieved through partnerships between a Scheme Administrator and Local Authorities and their waste management partners?

Please select one of the following options:

- a. Agree
- b. Disagree
- c. Unsure

19. Please provide any evidence you have to support your answer to question 18.

It is true that Local Authorities already deliver regular kerbside collections to households throughout the UK. One of the main functions of Local Authorities is to deliver effective and efficient services to local ratepayers therefore it is likely that any discharge of the obligation to provide a regular household collection service for small and bulky WEEE, delivered through a partnership with Local Authorities has the potential to be both efficient and cost effective.

Local Authorities however have a core set of statutory waste management functions we need to deliver and while some authorities may feel their current service delivery profile could adapt well to providing these collections, others may feel it adds operational difficulties that they are reluctant to risk due to the potential detriment to existing waste collection services.

Until more detail is available on what services producers would want offered and the associated funding mechanisms for these services etc. it is not possible for us to say if Lisburn & Castlereagh City Council would be in favour of acting as a service delivery partner for small and large WEEE kerbside collections. There is a degree of nervousness within Local Authorities that despite the intention for Producers to cover all costs associated with producer responsibility collection systems that this will not materialise in practice with Councils left subsidising collections, having to pay for support infrastructure or having to navigate a complex administration payment system that is designed to limit payments as much as possible under a guise of delivering effectiveness and efficiency.

There are also differences between authorities as to how kerbside collection services are delivered. No one size fits all approach is likely to be agreed between all authorities and indeed to achieve efficiencies the collection service offered would need to be compatible with the services already in place at an individual local authority level. It would therefore be difficult to provide a harmonised service that could be universally promoted across the UK as services are likely to differ on a Council by Council basis.

It is also fair to say that private sector waste management companies who are commercially driven may be able to offer innovative solutions that still deliver efficient and effective services but using a service delivery model different to that of Councils.

20. If you answered agree to question 16, what, if any, safeguards might be necessary to ensure costs incurred by producers in meeting the WEEE household collection obligation are reflective of the actual costs of delivery through their service partners?

From a Council perspective we feel Councils already deliver efficient and effective services as standard. Councils are subject to high levels of financial scrutiny with regards to both internal and external audit and comply with legislative requirements regarding waste management and public procurement regulations. Councils are also scrutinised and monitored with regards to waste collection and disposal through provision of quarterly data through the WasteDataFlow system.

If Councils were to work as delivery partners to provide household WEEE collections, we would be more concerned regarding ensuring Producers deliver full cost recovery for the services delivered on their behalf by Council.

21. Do you agree or disagree with the analysis of this proposal set out in the accompanying Impact Assessment? Please select one of the following options:

a. Agree

b. Disagree.

c. Unsure

22. Please provide any evidence you have to support your answer to question 21.

Council does not agree with the analysis surrounding the issue of Local Authority WEEE kerbside collection solutions/costs. The analysis assumes that all Local Authority refuse collection vehicles or kerbside sort vehicles could accommodate or be retrofitted to accommodate small WEEE collections. We do not consider that this will be possible for all Local Authorities (due to a number of issues with vehicle capacity; presence of existing underslung cages for alternative materials etc.). In addition, the analysis does not consider issues around the need to accommodate additional WEEE in Local Authority depots and household recycling centres (some of which are constrained) and the further complexities such as the potential need for Waste Management Licences/Environmental Permits or variations to Waste Management Licences/Environmental Permits that may come at significant expense.

23. Are there are other means of delivering a cost effective and efficient household collection service to that described in question 18, with alternative delivery partners to Local Authorities and if so, what might that look like?

Partnerships with private sector waste management companies may deliver innovative solutions as these organisations are more commercially driven and do not have the same levels of expectation from the public as Councils do. Also Councils need to comply with things like Equality and Rural Needs issues when delivering services which can impact how services are designed and delivered on the ground.

24. Please provide any other comments and supporting evidence on the proposal for producers (and distributors that do not provide take-back services) to finance a system of kerbside collection of small WEEE and on-demand collections of large WEEE for households?

Consideration needs to be given to collection of data on WEEE collected and how this contributes to future waste management targets. At present Local Authorities collect some WEEE for recycling and reuse and report this through WasteDataFlow. This then contributes to Council recycling and landfill diversion rates. If the collection of WEEE is to be through kerbside collections delivered by the private sector and a complimentary in store/distributor take back network this will have an impact on Councils reported recycling rates.

As Councils increasingly have to deal with harder to manage wastes, achievement of recycling targets will become more and more challenging. While targets in the past were household waste focused, we have now moved to municipal waste recycling and landfill targets. Given Councils are not solely responsible for the management of all municipal wastes some thought needs to be given as to how collective responsibility for meeting targets will be managed, especially as materials for which Councils previously received recycling benefits for are removed from our management, therefore impacting our ability to achieve increasingly challenging targets.

How this service (if carried out by the Local Authority) would be measured in terms of effective and efficient (as deemed by EPR) also need to be clarified. Although WEEE is not classed as packaging, would the WEEE service provided by LAs be considered under efficiency and effectiveness as part of the whole suite of waste management services provided by LAs?

25. Producers who place less than 5 tonnes of equipment on the UK market each year are exempt from financial obligations under the WEEE Regulations. Does that 5-tonne threshold remain appropriate? Please select one of the following options:

a. Yes

b. No

c. Unsure

26. If you answered no to question 25, what tonnage threshold is appropriate? Please provide evidence in support of an alternative threshold.

Producers would be better paced to provide an answer to this as they would have more information regarding what proportion of producers would fall under this threshold and therefore what proportion of costs the larger producers would need to cover on their behalf.

27. Are there alternative, non-regulatory approaches that could be established to increase separate collection of WEEE from households for re-use and recycling? If so, please describe what this might look like.

No – the need to divert WEEE from landfill had been a long-standing issue. Evidence presented in the consultation document would indicate that improvements are not being made therefore a regulatory approach is necessary to get all WEEE producers on board and level the playing field regarding allocation of costs etc.

Increasing distributor collections infrastructure

28. Do you agree or disagree that internet sellers and retailers should provide a free of charge “collection on delivery service”, requiring the free takeback of large domestic appliances such as washing machines, dishwashers, fridges, freezers and TVs? Please select one of the following options:

a. Agree

b. Disagree

c. Unsure

29. If you answered agree to question 28, should there be a reasonable time frame stipulated in which the unwanted item should be collected to allow for circumstances where it is not available for collection at time of delivery? Please select one of the following options:

a. Yes

b. No.

c. Unsure

30. If you answered yes to question 29, what should those timeframes be?

a. 2 days

b. 5 days

c. 10 days

d. No there should not be a reasonable timeframe stipulated.

31. If you answered agree to question 28, should this service be extended to collection of smaller items when a large item is collected? If so, should this be subject to reasonable limits in terms of how many items can be returned at once? Please select one of the following options:

a. Yes

b. No

c. Unsure

While this is a nice idea it is hard to see how it would work in practice as logistically it would be difficult for companies to plan deliveries with take back for an unspecified number of smaller WEEE items. It would require dedicated space in delivery vehicles to store returned small WEEE which could build inefficiencies into deliveries. Any requirement for a small WEEE collection would need to be specified at the time of placing the order for the larger WEEE item etc.

32. Should retailers selling new household appliances as part of a new kitchen also be obligated to take away the old appliances from the household free of charge? Please select one of the following options:

a. Yes

b. No

c. Unsure

33. Please provide any evidence you have to support your answer to question 32.

N/A

34. Do you agree or disagree that we should extend the existing take-back requirements for large retailers from 1:1 to a 0:1 basis ie by removing the requirement to purchase an item for the take-back obligation to apply? Please select one of the following options:

a. Agree

b. Disagree

c. Unsure

35. If you answered 'agree' to question 34, do you agree or disagree that such an obligation should be subject to reasonable limits as to the quantities of WEEE returned per householder? Please select one of the following options:

- a. Agree
- b. Disagree
- c. Unsure

36. Do you agree or disagree that the definition of "large retailer" should be any business with an annual turnover of electrical and electronic equipment of over £100k? Please select one of the following options:

- a. Agree
- b. Disagree
- c. Unsure

37. Please provide any evidence you have to support your answer to question 36.

N/A

38. If you answered 'disagree' to question 36, what should an alternative threshold be? Please provide evidence to support your answer.

N/A

39. Do you agree or disagree that the obligation be restricted to retailers only taking back items that are similar to those sold in their stores? Please select one of the following options:

- a. Agree
- b. Disagree
- c. Unsure

40. Please provide any evidence you have to support your answer to question 39.

While we can understand the logic of only obliging retailers to take back items that are similar to those sold there is an ease of messaging to the public that they can return an item of WEEE to any retailer of WEEE.

41. Do you agree or disagree that an alternative obligation to 0:1 takeback be available to internet sellers such as payment into a scheme, similar to the current distributor takeback scheme, be used to support increased levels of collections for re-use and recycling? Please select one of the following options:

- a. Agree

b. Disagree

c. Unsure

42. Please provide any evidence you have to support your answer to question 41.

N/A

43. Do you agree or disagree that the current information requirements should be enhanced to ensure customers are provided with information about their recycling options 'at the point of sale'? Please select one of the following options:

a. Agree

b. Disagree

c. Unsure

44. Please provide any evidence you have to support your answer to question 43.

It is important for consumers to have this information so they are able to take responsibility for the items they are purchasing, especially as a result of the changes to the WEEE regulations which will result in many more options for consumers to use.

Since January 2021, large retailers have been obliged to offer in store 1-1, like for like, but this has not transpired therefore the provision of clear information to all parties obligations is key to success.

45. Do you agree or disagree that the point of producer responsibility should be moved to the retailer or internet seller's premises such as the retailer's store, bulking point, distribution point? Please select one of the following options:

a. Agree

b. Disagree

c. Unsure

46. Please provide any evidence you have to support your answer to question 45.

N/A

47. Are there any other obligations we should place on retailers and/or internet sellers to increase levels of collections?

N/A

48. Please provide any evidence you have to support your answer to question 47.

N/A

49. Do you agree or disagree that Online Marketplaces and/or fulfilment houses should have 'take-back' obligations where they facilitate the supply of the product to the householder? Please select one of the following options:

a. Agree

b. Disagree

c. Unsure

50. Please provide any evidence you have to support your answer to question 49.

N/A

51. How long will industry need to adapt to the proposals set out above? Please select one of the following options:

a. Up to 12 months

b. 12 to 18 months

c. 18 to 24 months

d. 24 to 48 months

52. Please provide any evidence you have to support your answer to question 51.

Best answered by industry but up to two years would seem a reasonable timeframe taking on board the time needed to put suitable arrangements in place but balancing this with the need to act now to increase WEEE recycling and reuse.

New producer obligations for Online Marketplaces and Fulfilment Houses

53. Do you agree or disagree that Online Marketplaces should be required to fulfil the producer obligations on behalf of their overseas sellers? Please select one of the

following options:

a. Agree

b. Disagree

c. Unsure

54. Please provide any evidence you have to support your answer to question 53.

N/A

55. Do you agree or disagree that fulfilment houses should be required to meet the producer obligations on behalf of their overseas sellers? Please select one of the following options:

a. Agree

b. Disagree

c. Unsure

56. Please provide any evidence you have to support your answer to question 55.

N/A

57. Do you agree that Online Marketplaces/fulfilment houses should initially be able to use estimated weight data using a protocol agreed with the environmental regulators? Please select one of the following options:

a. Agree

b. Disagree

c. Unsure

58. If you answered agree to question 57, please provide evidence to explain why exact data cannot be provided.

If online marketplaces/fulfilment houses are not currently collecting weight data a process needs to be put in place to initially use estimated data but to enable the accurate capture of actual weight data moving forward. Also if there is a 18-24 month implementation period this should allow adequate time for proper data capture processes to be put in place.

59. What additional costs will accrue to online marketplaces and fulfilment houses as a result of becoming defined as a producer?

N/A

60. Please provide any evidence you have to support your answer to question 59.

N/A

61. What other ways, if any, should government explore to tackle the issue of non-compliance with the WEEE Regulations by online sellers?

Proper regulation that is adequately resourced with costs to be covered by the Compliance Scheme but operating independent of this scheme.

62. Please provide any evidence you have to support your answer to question 61.

N/A

Dealing with the environmental impacts of vaping products

63. Do you agree with the proposal to create a new category for vapes? Please select one of the following options:

a. Yes

b. No

c. Unsure

64. What additional costs will accrue to producers, compliance schemes and regulators as a result of creating a new category for vapes? Please provide evidence to support your answer.

Currently, the significant majority of the cost and risk of handling waste vapes (e.g. as litter and residual waste) sits with Local Authorities, which is clearly not in compliance with the 'polluter pays' principle or Producer Responsibility. Producers, compliance schemes and regulators should fund the full net costs of collection and recycling of disposable vapes, alongside communications to support proper disposal.

Given potential problems around the collection of Vapes a Deposit Return Scheme (DRS) could be a viable solution to encourage consumers to take responsibility for returning used vapes. This could impact consumers who are not likely to 'do the right thing' and responsibly return products to safe disposal routes without incentive.

65. Are there any other measures, beyond those for eco-modulation and littering set out in the call for evidence, you think government should take to curb the environmental impact of vapes? Please provide evidence to support your answer.

Ban disposable vapes. If a decision is taken to not ban disposable vapes mandate the design of these products to make recycling easier e.g. battery removal is a must, given the fire hazard to recycling facilities.

System governance, the creation of a WEEE Scheme Administrator and performance indicators

66. Do you agree or disagree with the principle of establishing Government approved, producer-led Scheme Administrator to carry out specified functions in the reformed WEEE system? Please select one of the following options:

a. Yes

b. No

c. Unsure

67. Please provide any evidence you have to support your answer to question 66.

As a Scheme Administrator will also be used as a vehicle to manage Packaging Extended Producer Responsibility this would be a consistent approach however an independent scheme administrator, who can reflect the opinions of all stakeholders could be preferable to a producer-led body.

68. If you answered no to question 66, please set out details of an alternative approach to the proposed functions of a Scheme Administrator.

N/A

69. Which of the following functions do you think the Scheme Administrator should carry out?

i. managing the Producer Balancing system for household WEEE (and non-household if necessary)

ii. administration of a Distributor Takeback Scheme (for use by those distributors who are not required under the new system to offer in store take-back)

iii. development and administration of a compliance fee methodology in consultation with all PCSs, for approval by Government

iv. providing evidence and forecasts of the likely household WEEE arisings –presenting recommendations to Government s to inform setting annual financial obligations placed on PCSs for household WEEE collections

v. eco-modulation – support Government on potential new measures which could be applied to specific product categories, including development of a methodology upon which to base the modulation

vi. assess and report on environmental performance of the future system against key performance indicators with recommendations to Government on measures to improve that performance

70. Are there any additional functions that should be added?

N/A

71. Please provide any other comments on the role of a Scheme Administrator.

A Scheme Administrator will need to be adaptable to reflect the interests of any service delivery partner appointed by producers to deliver kerbside collections of small and large WEEE.

An Administrator needs to be independent and configured in a way to drive and ensure maximum WEEE recycling rather than protect the interests of Producers. It would be sensible to have a wide range of Stakeholders on the 'Board' of any Scheme Administrator, including Local Authority representation if LA's are involved in collection of WEEE on behalf of producers.

72. Which of the alternative performance indicators listed in the section above do you agree or disagree should be included in the future system?

- a. Quantity or weight of WEEE in residual waste.
- b. Convenience of recycling.
- c. Volume of WEEE in fly-tipped waste in each of the nations.
- d. Level of consumer awareness of value and opportunities for reusing or recycling WEEE.
- e. Regular assessment of the carbon impact the UK WEEE system.
- f. Assessment of circular economy performance of the system.
- g. Improvements in the quality of WEEE treatment processes.
- h. Amount of WEEE diverted for reuse.

NB Some of these indicators will only be measurable through compositional studies involving local authorities. All costs of measurement need to be covered by the WEEE producers, irrespective of if Local Authorities are involved in WEEE collections or not with data also made available to LA's in recognition of their cooperation for such studies to be conducted.

As referenced above in response to Q24, consideration needs to be given to collection of data on WEEE collected and how this contributes to future waste management targets. At present Local Authorities collect some WEEE for recycling and reuse and report this through WasteDataFlow. This then contributes to Council recycling and landfill diversion rates. If the collection of WEEE is to be through kerbside collections delivered by the private sector and a complimentary in store/distributor take back network this will have an impact on Councils recycling rates.

As Councils increasingly have to deal with harder to manage wastes, achievement of recycling targets will become more and more challenging. While targets in the past were household waste focused, we have now moved to municipal waste recycling and landfill targets. Given Councils are not solely responsible for the management of all municipal wastes some thought needs to be given as to how collective responsibility for meeting targets will be managed, especially as materials for which Councils previously received recycling benefits for are removed from our management, therefore impacting our ability to achieve increasingly challenging targets.

73. Are there any other measures of success which government should consider to assess the performance of the system?

% of households serviced by a kerbside small & large WEEE collection service.

74. Should information be collected to a level to support regional or local? Please select one of the following options:

- a. Yes
- b. No
- c. Unsure

The collection and publication of both local and regional information would be useful, especially to understand how much is being collected via the various options that will be available to consumers – at kerbside, via take-back in store, reverse distribution etc.

Call for evidence on reforming the producer responsibility system for waste electrical and electronic equipment

Draft Response L&CCC

Q1. What is your name?

Noeleen O'Malley

Q2. What is your email address?

Noeleen.omalley@lisburncastlereagh.gov.uk

Q3. Which of the following best describes you?

Local government

Q4. Would you like your response to be confidential?

No

Full net cost recovery

5. Considering the points for and against set out in the call for evidence, please select which of the following activities producers should finance the cost of:

a) WEEE in the residual waste

b) Fly-tipped WEE

c) Littered WEEE

6. Please provide evidence of the volume (tonnes) of WEEE arising at UK level and/or by nation level in residual waste.

Council does not hold information of this nature. A detailed waste composition analysis would be required to properly evidence the volume of WEEE arising at a UK level in residual waste. While an analysis of Council kerbside collections and Household Recycling Centre (HRC) residual waste would provide good evidence to quantify the volumes of WEEE in domestic residual waste, consideration would also need to be given as to how this evidence could be gathered for non-household waste sources.

7. Please provide evidence of the volume (tonnes) of WEEE arising the UK level/and or by nation that has been fly-tipped.

Council does not hold information of this nature.

8. Please provide evidence of the volume (tonnes) arising at UK level and/or by nation that has been littered.

Council does not hold information of this nature.

9. Please provide evidence of the net costs per tonne for collection of WEEE arising in residual waste.

Council does not hold information of this nature.

10. Please provide evidence of the net costs per tonne for collection of WEEE that has been fly-tipped.

Council does not hold information of this nature.

11. Please provide evidence of the net costs per tonne for collection of WEEE that has been littered.

Council does not hold information of this nature.

12. Please provide evidence of the types of WEEE commonly discarded in the residual waste stream.

Council does not hold information of this nature. Anecdotally we would expect smaller WEEE items are more commonly discarded in the residual waste stream collected from kerbside i.e. items that can fit into a standard wheelie bin, alongside other residual waste collected.

As Council currently segregates WEEE at HRC's it is less likely that either small or large WEEE items end up in this element of the residual waste stream.

13. Please provide evidence of the types of WEEE commonly fly-tipped.

Council does not hold information of this nature.

14. Please provide evidence of the types of WEEE commonly littered.

Council does not hold information of this nature.

Allocation of costs for the collection and treatment of household WEEE

15. Do you agree or disagree that we should establish a rolling 3-year process for setting the financial obligations of producers to create more certainty in the system? Please select one of the following options:

a. Agree

b. Disagree

c. Unsure

16. Please provide evidence of whether or not setting a rolling three-year forecast would provide more certainty in the system and act to encourage increased investment by the treatment sector.

The treatment sector is best placed to provide evidence in this regard.

17. Please provide evidence of whether or not a three-year forecast to set financial obligations be supported by a three-year minimum PCS-DCF contract duration in order to encourage increased investment by the treatment sector?

The treatment sector is best placed to provide evidence in this regard.

18. What are your views on the idea of establishing an allocation system as an alternative way to set financial obligations on producers and guaranteeing the **financing of Local Authority collections**?

No comment

19. Please provide evidence on the estimated costs and monetised benefits of both establishing and operating such a system.

No comment

20. Please provide evidence of any other alternative approaches, not described in Chapter 2, which you think could be suitable for allocating financial obligations on producers.

No comment

Prevention of waste and increasing re-use of unwanted electrical and electronic equipment

21. Do you agree or disagree that giving a higher weighting to tonnage collected by PCSs for re-use (or preparation for re-use) towards their collection targets, than tonnage collected for recycling would incentivise greater re-use (or preparation for reuse) of WEEE? Please select one of the following options:

a. Agree

b. Disagree

c. Unsure

22. Please provide any evidence you have to support your answer to question 21.

No evidence to provide however we feel it is logical to believe that if re-use is given a higher weighting towards collection targets it should act as an incentive to increase reuse levels of WEEE.

23. Do you agree or disagree that we should introduce new targets for the re-use (or preparation for re-use) of WEEE that has been collected separately from other types of waste to incentivise more collections for re-use (or preparation for re-use)? Please select one of the following options:

a. Agree

b. Disagree

c. Unsure

24. Please provide any evidence you have to support your answer to question 23.

While re-use being given a higher weighting towards collection targets should act as an incentive to increase reuse levels of WEEE, introducing an associated target would further focus attention on the more preferable reuse option. A double approach such as this may also focus manufacturers minds more when considering the design of electrical goods to make them easier to repair thus making reuse an easier option moving forward.

25. If you answered agree to question 23, please provide evidence to indicate on which of the stakeholder groups below targets should be placed to maximise impact?

Please select one of the following options:

- a. Producers (via PCSs)
- b. Retailers
- c. Local authorities
- d. Both retailers and Local Authorities
- e. Unsure

26. Please provide any evidence you have to support your answer to question 25.

If the proposed collection systems and associated measures for increasing the volumes of WEEE collected are to be financed and led by producers, via a producer led Scheme Administrator it would seem logical that the targets should be placed on these same producers. The Consultation on reforming the producer responsibility system for waste electrical and electronic equipment clearly states in its proposals that producers of electronic and electrical products will be responsible for financing kerbside collections of small household WEEE and bulky waste collections for larger WEEE items. It also however states that producers will not be mandated to work with local authorities for these collections. It would therefore not be appropriate to place targets on local authorities as they neither produce or sell the electric equipment in question and may not have a role in its collection either.

27. Do you agree or disagree that an obligation on PCSs to provide free collection services to re-use charities and the charity retail sector for donated equipment subsequently deemed unsuitable for re-use would promote greater re-use by removing a significant cost barrier to the sector? Please select one of the following

options:

- a. Agree
- b. Disagree
- c. Unsure

28. Please provide any evidence you have to support your answer to question 27.

At present Charities may be unwilling to accept WEEE items for potential reuse due to concerns regarding if an item cannot be repaired they will then be liable for the cost of disposing of the items. A foc collection service could help alleviate these concerns.

29. Do you agree or disagree that access to data from retailers and Local Authorities on how much used equipment is received at these collection facilities for re-use (and consequentially diverted away from entering the WEEE producer responsibility system) would provide significant and useful new insight into volumes of equipment being re-used that is not classified as waste? Please select one of the following options:

- a. Agree

- b. Disagree
- c. Unsure

30. Please provide any evidence you may have to support your answer to question 29.

If reporting requirements are introduced there needs to be some consideration of the resource required to capture data and report accordingly. In the absence of a more cohesive reuse and repair network some local authorities may divert WEEE for reuse or repair however it would be preferable for reuse and repair to be facilitated directly by custom established organisations whose main role is reuse/repair.

31. Please provide evidence (including from international sources) of other potential mechanisms to increase levels of re-use and preparation for reuse activities across a broad range of products.

Targets and opportunities for increased levels of reuse would need to be accompanied by regular, ongoing and robust national and local communications campaigns that encourage consumers to choose reusable products and to support repair initiatives.

Product design for reusability to include modular design, standardised components, and easy disassembly for repair or refurbishment would assist with increasing reuse levels.

Creation of community-based reuse centres and expanding coverage of initiatives such as repair cafes.

Legislation and Regulation designed to incentivise or mandate product reuse. Tax incentives for companies engaging in reuse activities or penalties for those contributing to excessive waste and placing harder to reuse products on the market.

Moving to a circular economy through the design of better products and business models

32. Do you agree or disagree that implementing a system of eco-modulation into the UK's WEEE system could incentivise more sustainable product design? Please select one of the following options:

- a. Agree
- b. Disagree
- c. Unsure

33. Please provide any evidence you have to support your answer to question 32.

This is in keeping with the system being proposed under the packaging EPR scheme and therefore delivers consistency in approach whereby producers are encouraged to deliver better product design in order to reduce the amount of fees they would be obliged to pay.

34. If you agree with question 32, which of the following approaches would you most likely support:

- a. A new system of EPR in which variable fees, based on units placed on the market (POM), are modulated through the implementation of a malus (increased fee) or bonus (reduced fee).
- b. Maintain the current system of setting obligations based on a market share (by weight) approach but with that market-share modulated to reward producers whose products have the lowest environmental impact, thereby reducing their compliance costs compared to those producing more harmful products.

c. Either of the above approaches

35. Which of the following metrics should we use to prioritise products to eco-modulate?

Please select one of the following options:

- a. Total weight of the product (in tonnes).
- b. Total volume (in units) sold on the UK market.

c. Carbon intensity of the product.

36. Which of the following criteria should be used as an effective basis for eco-modulation:

a. Recycled content

b. Recyclability

c. Reparability

d. Durability

e. Energy efficiency

f. Hazardous substances

37. Are there any other criteria, other than those set out in question 36, which you feel would be relevant? Please specify what these could be.

Lifecycle/carbon footprint

38. How should compliance with eco-modulation criteria be verified in a way that balances cost with the integrity of the system? Please select one of the following options:

a. Self-declaration

b. Third party declaration

c. In advance control or inspection by the authorities

d. Other (please specify)

39. Do you agree or disagree that eco-modulation should be supported by mandatory labelling to give consumers visibility of the extent to which the product has met certain eco-design criteria? Please select one of the following options:

a) Agree

b) Disagree

c) Unsure

40. Please provide any evidence you have to support your answer to question 39.

N/A

41. If you answered 'agree' to question 39, in which format do you think this information should be displayed? Please select one of the following options:

a) QR Code (or other electronic tag)

b) Physical label

More easily accessible than a QR code that relies on access to a smart phone and a certain level of digital enablement for people to access.

c) Alternative format (please specify)

42. Do you agree or disagree that products made available on the market using circular economy business models should be excluded from the calculation of collection and treatment obligations placed on producers because they will in any case be responsible for the individual product when it becomes waste? Please select one of

the following options:

a. Agree

b. Disagree

c. Unsure

43. Please provide any evidence you have to support your answer to question 42

Products placed on the market using circular economy models will still eventually become waste with the cost for treatment/disposal of this product needing to be financed by producers within the circular economy business model.

Increasing collections of business WEEE

44. Do you agree or disagree that the current business to business (B2B) system (EEE or WEEE that is designed for business, industry or professional use only, rather than household use) is an effective mechanism by which end users can return WEEE to producers for proper treatment? Please select one of the following options:

- a. Agree
- b. Disagree
- c. Unsure

45. Please any evidence you have to support your answer to question 44.

As a local authority we often receive 'commercial type' WEEE such as refrigeration units that our WEEE service providers classifies as business WEEE. We are then left with the cost of recycling this material despite it being brought to us by a householder.

46. Do you agree or disagree that we should extend the principle of producer responsibility to the premises of the business end user (and other non-household premises) and introduce a collective producer responsibility system for Business to Business (B2B) WEEE? Please select one of the following options:

- a. Agree
- b. Disagree
- c. Unsure

47. Please provide any evidence you have to support your answer to question 46.

N/A

48. Are there circumstances (for example, for certain product types) in which individual producers should be responsible for the cost of collection and treatment of the products they place on the market when they become waste? Please select one of the following options:

- a. Yes
- b. No

c. Unsure

49. If you answered yes to question 28, please set out what these product types might be.

It is likely question 48 has a typo and should have read: Are there circumstances (for example, for certain product types) in which individual producers should NOT be responsible for the cost of collection and treatment of the products they place on the market when they become waste?

In this respect, L&CCC believes that producers should be responsible for all WEEE products in order to comply with the producer pays principle and the principles of EPR. There are therefore no circumstances or product types for which individual producers should not be responsible for the cost of collection and treatment of the products they place on the market when they become waste.

50. Do you agree that a system in which producers financed the cost of collection from the business end user and adequately supported by appropriate communications would be sufficient to drive increased levels of business WEEE into the system? Please select one of the following options:

- a. Agree
- b. Disagree
- c. Unsure

51. Please provide any evidence you have to support your answer to question 50.

N/A

52. Are there any circumstances in which it might not be appropriate for producers to finance collections from businesses? Please select one of the following options:

- a. Yes
- b. No
- c. Unsure

53. If you answered yes to question 52, please say circumstances these may be. Please provide any evidence you have to support your answer.

N/A

54. Do you agree or disagree that there should be a ban on producers and distributors sending whole items of electrical equipment (such as surplus stock) to landfill or incineration? Please select one of the following options:

- a. Agree
- b. Disagree
- c. Unsure

55. Please provide any evidence you have to support your answer to question 54.

N/A

56. If a ban were to be implemented, do you foresee any unintended consequences of unwanted electrical stock being redirected to any of the following routes? Please select one of the following options:

- Reselling
- Repair / refurbishment
- Re-use
- Recycling

57. Please provide any evidence you have to support your answer to question 56.

A robust enforcement and data collection system would need to be established and appropriately resourced by the Regulator (paid for by producers) to ensure that these items were being sent to one of the above routes, with strong sanctions enforced against producers and distributors that do not comply.

58. What are your views on alternative policies to improve the B2B system? Please provide any evidence you have to support your answer.

N/A

Improving treatment standards

59. Do you agree or disagree that the recovery and recycling rates for WEEE should be reviewed to ensure that those targets remain sufficiently challenging whilst achievable? Please select one of the following options:

a. Agree

b. Disagree

c. Unsure

60. Please provide details of evidence sources used to support your answer and evidence on the extent current targets are being met and exceeded.

N/A

61. Do you agree or disagree that AATFs should be required to report annually on the extent to which they have met those recycling and recovery targets and that their report should be supported by an independent audit? Please select one of the following options:

a. Agree

b. Disagree

c. Unsure

62. Please provide any evidence you have to support your answer to question 61.

N/A

63. Please provide evidence of likely costs of both reporting and independently auditing recycling and recovery rates.

N/A

64. Do you agree or disagree that the introduction of individual recovery targets for specific materials, including critical minerals would drive recovery of and demand for those materials thereby contributing to Net Zero and Circular Economy ambitions whilst supporting security of supply of certain materials? Please select one of the following options:

a. Agree

b. Disagree

c. Unsure

65. Please provide any evidence you have to support your answer to question 64.

N/A

66. If you agree with question 64: would you support the introduction of reporting on specified materials to form a useful evidence base ahead of setting targets in the future? Please select one of the following options:

a. Agree

b. Disagree

c. Unsure

67. If you answered agree to question 66, should these targets be mandatory or non-binding?

a. Mandatory

b. Non-binding

68. We require treatment facilities to demonstrate sound management of WEEE, including removal of specified hazardous material and POPs. Are there any other substances and components which should be added to the restricted list? Please provide evidence to support your answer.

N/A

69. What do you think are the key barriers to improving material recovery when treating WEEE? Please select one of the following options:

a. Information barrier

b. Technological barrier

c. Other

70. If you answered 'other' to question 69, please specify what this would be.

Cost and lack of suitable infrastructure.

71. What information do you think suppliers of products should be required to provide to assist waste treatment operators to increase the recovery of specific materials or components commonly found in WEEE?

Full details of all materials used in the manufacture of the product including the quantities of each of the materials in question.

Committee:	Environment & Sustainability
Date:	6th March 2024
Report from:	Head of Service (Acting) - Environmental Health, Risk and Emergency Planning

Item for:	Noting
Subject:	LCCC – Updated Air Quality Action Plan (2024)

1.0 **Background and Key Issues**

- 1.1 In January 2011, Castlereagh Borough Council declared an Air Quality Management Area (AQMA) for Normandy Court in Dundonald Village. The AQMA was declared after an assessment of air quality identified exceedances of the annual mean objective for Nitrogen Dioxide (NO₂) due to road traffic emissions. Following Local Government Reform in 2015, the AQMA is now within the Lisburn & Castlereagh City Council (LCCC) area.
- 1.2 Where an AQMA has been declared, Local authorities have a responsibility under Article 13(2) of the Environment (Northern Ireland) Order 2002 to prepare and submit an Air Quality Action Plan (AQAP) to the Department for Agriculture, Environment and Rural Affairs to identify proposals in pursuit of meeting the Air Quality Standard (AQS) objectives. There is also a requirement on other relevant authorities to identify proposals within their respective responsibilities and functions.
- 1.3 LCCC's AQAP sets out key actions which were to be completed to improve the air quality, and gain compliance with the air quality objectives for NO₂. These actions were identified through engagement with other relevant authorities including the Department for Infrastructure, Roads, Translink and neighbouring Councils.
- 1.4 LCCC also undertake annual reviews of air quality through the completion of Progress Reports and Updated Screening Assessments in line with Article 11(1) of the Environment (NI) Order 2002.
- 1.5 The reviews have demonstrated that levels of NO₂ have decreased within the AQMA and have been below the AQS objective since the completion of the Rapid Transport System in Dundonald in 2018.
- 1.6 Following the publishing of the 2023 Annual Review, and subject to the NO₂ levels remaining below the objective, LCCC will move towards revoking the AQMA in Dundonald.
- 1.7 To revoke the AQMA, a Detailed Assessment (DA) will be undertaken clearly stating the reasons for revocation and providing the evidence to demonstrate that the AQ objectives have been achieved. Monitoring results should demonstrate levels sufficiently below the relevant objective level to be considered as demonstrating genuine compliance.

	<p>1.8 The proposed revocation of the AQMA shall include consultation with the relevant statutory consultees, local stakeholders, businesses and members of the public. The DA report will be submitted to DAERA for appraisal. Where the appraisal report accepts that it would be appropriate to revoke the AQMA, LCCC will revoke the AQMA within 4 months from the date that DAERA confirms the findings of the appraisal report.</p> <p>1.9 The attached updated AQAP (Appendix 1 EH) seeks to inform on the outcomes of the key actions from the previous AQAP and sets out the proposals for future work to improve air quality and continued achievement of the AQS objectives in Table 10 within the AQAP.</p>													
2.0	<p><u>Recommendations</u></p> <p>It is recommended that Members note the updated Air Quality Action Plan (2024).</p>													
3.0	<p><u>Finance and Resource Implications</u></p> <p>None.</p>													
4.0	<p><u>Equality/Good Relations and Rural Needs Impact Assessments</u></p> <table border="1" data-bbox="209 1016 1252 1545"> <tr> <td data-bbox="209 1016 316 1115">4.1</td> <td data-bbox="316 1016 1252 1115">Has an equality and good relations screening been carried out?</td> <td data-bbox="1252 1016 1489 1115">Yes</td> </tr> <tr> <td data-bbox="209 1115 316 1285">4.2</td> <td data-bbox="316 1115 1252 1285">Brief summary of the key issues identified and proposed mitigating actions <u>or</u> rationale why the screening was not carried out</td> <td data-bbox="1252 1115 1489 1285">No associated equality impact</td> </tr> <tr> <td data-bbox="209 1285 316 1384">4.3</td> <td data-bbox="316 1285 1252 1384">Has a Rural Needs Impact Assessment (RNIA) been completed?</td> <td data-bbox="1252 1285 1489 1384">No</td> </tr> <tr> <td data-bbox="209 1384 316 1545">4.4</td> <td data-bbox="316 1384 1252 1545">Brief summary of the key issues identified and proposed mitigating actions <u>or</u> rationale why the screening was not carried out.</td> <td data-bbox="1252 1384 1489 1545">No associated rural needs impact</td> </tr> </table>	4.1	Has an equality and good relations screening been carried out?	Yes	4.2	Brief summary of the key issues identified and proposed mitigating actions <u>or</u> rationale why the screening was not carried out	No associated equality impact	4.3	Has a Rural Needs Impact Assessment (RNIA) been completed?	No	4.4	Brief summary of the key issues identified and proposed mitigating actions <u>or</u> rationale why the screening was not carried out.	No associated rural needs impact	
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Appendices:	Appendix 1 EH – Updated Air Quality Action Plan (2024)
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Lisburn & Castlereagh City Council

Updated Air Quality Action Plan



February 2024

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1. Introduction and Aims of the Action Plan

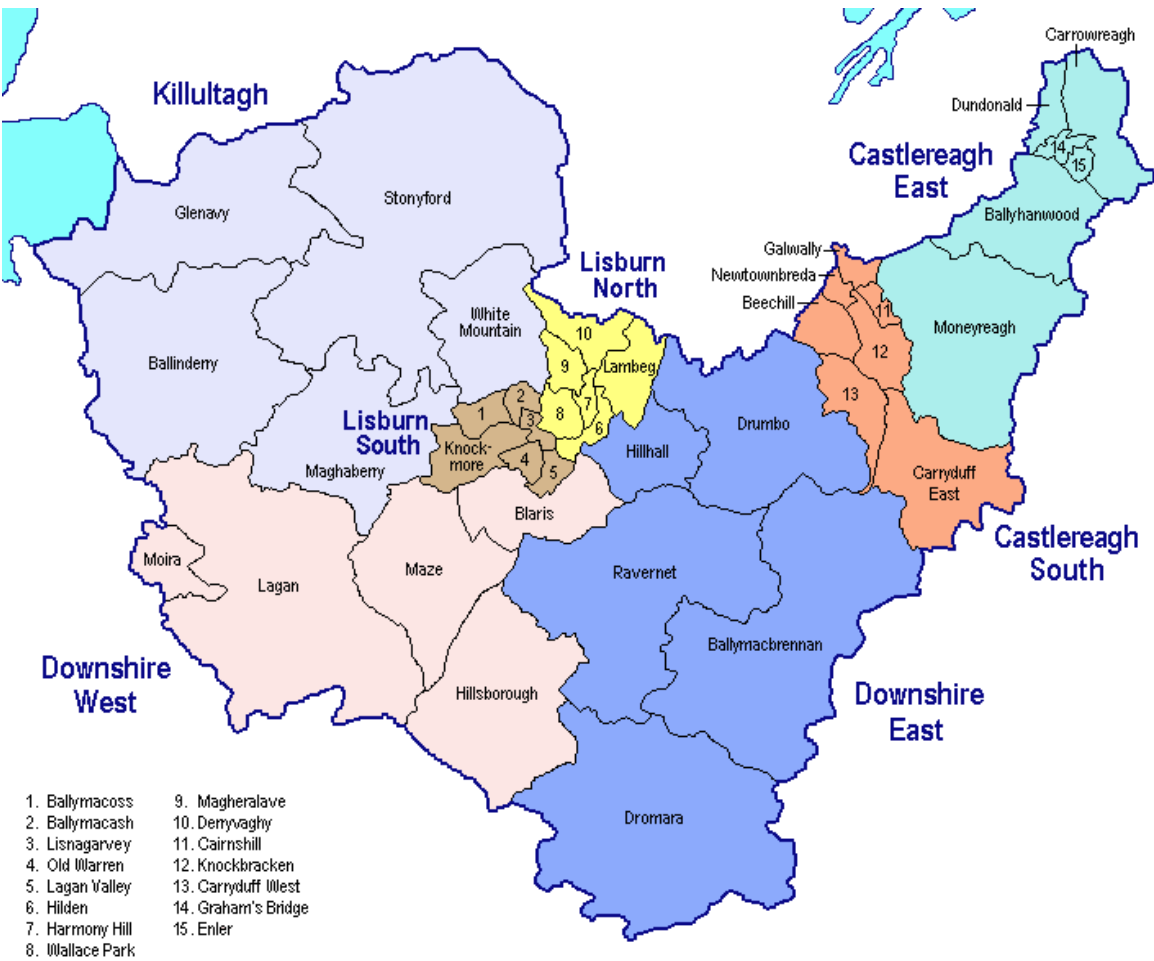
1.1 Context

Castlereagh Borough Council declared an Air Quality Management Area (AQMA) for Normandy Court in Dundonald Village in January 2011. The AQMA was declared following assessments of air quality identified exceedances of the annual mean objective for nitrogen dioxide (NO₂). On 1st April 2015 local authorities in Northern Ireland amalgamated and the AQMA is now within Lisburn & Castlereagh City Council (LCCC).

1.2 Profile of the Council

LCCC has a population of 149,106 (NISRA Census, 2021) and an area of approximately 200 square miles. The area is of urban rural character and the predominant wind direction is from the Southwest. It is bounded by a number of other council areas and has the largest boundary with Belfast City Council. This has made LCCC a very popular residential area due to the ease of the commute to Belfast City Centre

Figure 1 Map of Lisburn and Castlereagh City Council area



1.3 Legislative Background

The Environment (Northern Ireland) Order 2002 introduced a statutory obligation on local authorities to review and assess the air quality in their areas from time to time to determine whether the air quality objectives are likely to be met. Local Air Quality Management Policy Guidance is designed to help local authorities with their Local Air Quality Management (LAQM) duties under Part III of the Environment (NI) Order 2002. LAQM PGNI(09) sets out the legislative framework for the system of local air quality management. This system is an integral part of delivering the air quality objectives set out in the Air Quality Strategy for England, Scotland, Wales and Northern Ireland, which were published in January 2000.

The Air Quality Regulations (NI) 2003 provide the statutory basis for the LAQM system and set out the air quality objectives (see Table 1). Local authorities were required to consider whether the Air Quality Objectives were achievable within the required date. Where it appeared likely that the air quality concentration (ie the amount of pollution) was going to be higher than the limits a local authority had to declare an Air Quality Management Area (AQMA).

Following the declaration of an AQMA, the authority was required to carry out a further assessment of existing and likely future air quality. Under Article 12(2) of the Environment (NI) Order 2002 the local authority was required to develop an Air Quality Action Plan (AQAP). The AQAP should set out the local actions that can be taken to work towards improving air quality and meeting the objectives.

The Air Quality Strategy for England, Scotland, Wales and Northern Ireland, first published in 1997, established a strong framework for tackling air pollution. It was established on the basis of strong scientific evidence and a science-based understanding of the effects of air pollutants on health and the environment.

The Air Quality Strategy highlighted a number of government policies that aim to tackle air pollution throughout the UK. These policies focused broadly on the UK as a whole, but also function in parallel with local and regional air quality management policies introduced by devolved administrations and councils. Policy initiatives were also introduced by the government to address air quality emissions such as

1. Cleaner Vehicles:
 - Promoting smarter driving to reduce fuel consumption
 - Encouraging the use of alternative modes of transport
 - Purchasing of more fuel-efficient vehicles
 - Use of cleaner alternative fuels
 - Highlighting alternatives to flying when travelling abroad
2. Industrial Pollution Prevention and Control (IPPC):
 - Reducing emissions to Air, Water and Land
3. Air Pollution Prevention and Control:
 - Regulation of over 16,000 industrial premises to minimize air emissions.
4. Clean Air Act:
 - To control domestic and industrial smoke emissions

The then Department of the Environment in Northern Ireland published the Air Quality Standards Regulations (Northern Ireland) 2007, which came into operation on 28th May 2007.

1.4 Scope of the Action Plan

Where local authorities have designated AQMAs, they have a duty to produce an Action Plan. This plan must set out the measures the local authority intends to introduce with the aim of reducing pollution below the Air Quality Standards (AQS) objectives. The AQAP is expected to include:

- Quantification of the source contributions to the predicted exceedances of the objectives, to allow the action plan measures to be effectively targeted;
- Evidence that all available options have been considered on the grounds of cost effectiveness and feasibility.
- How the local authority will use its powers and work in conjunction with other relevant authorities in pursuit of the air quality objectives;
- Clear timescales in which the local authority propose to implement the measures within its plan.
- Details of proposals and implementation timetables submitted by other relevant authorities.
- Quantification of the expected impacts of the proposed measures and, where possible, an indication as to whether the measures will be sufficient to meet the air quality objectives.
- How the local authority intends to monitor and evaluate the effectiveness of the action plan.

Lisburn & Castlereagh City Council has responsibility under Article 13(2) of the Environment (Northern Ireland) Order 2002 to prepare and submit an Action Plan to the Department of the Environment for Northern Ireland (now the Department for Agriculture, Environment and Rural Affairs). The responsibility for preparing the Action Plan rests with the local authority, however, there is a requirement on other relevant authorities to identify proposals in pursuit of the AQS objectives within their respective responsibilities and functions.

This Action Plan has been developed in consultation with other relevant bodies, including The Department for Infrastructure NI, DFI Planning Service, Translink, DFI Travelwise NI and neighboring councils.

Part III of the Environment (NI) Order 2002 places a statutory duty on Local Authorities to periodically review and assess the air quality within their area. Local authorities assess air quality against a number of Air Quality Objectives, which are set by Government through the Air Quality Regulations (NI) 2003 (Table 1).

Table 1. Air Quality Objectives included in Regulations for the purpose of Local Air Quality Management in Northern Ireland.

Pollutant	Concentration	Measured as	Date to be achieved by
Benzene	16.25 $\mu\text{g}/\text{m}^3$	Running annual mean	31.12.2003
	3.25 $\mu\text{g}/\text{m}^3$	Running annual mean	31.12.2010
1,3-Butadiene	2.25 $\mu\text{g}/\text{m}^3$	Running annual mean	31.12.2003
Carbon monoxide	10.0 mg/m^3	Maximum daily running 8-hour mean	31.12.2003
Lead	0.5 $\mu\text{g}/\text{m}^3$	Annual mean	31.12.2004
	0.25 $\mu\text{g}/\text{m}^3$	Annual mean	31.12.2008
Nitrogen dioxide	200 $\mu\text{g}/\text{m}^3$ not to be exceeded more than 18 times a year	1-hour mean	31.12.2005
	40 $\mu\text{g}/\text{m}^3$	Annual mean	31.12.2005
Particles (PM₁₀) (gravimetric)	50 $\mu\text{g}/\text{m}^3$, not to be exceeded more than 35 times a year	24-hour mean	31.12.2004
	40 $\mu\text{g}/\text{m}^3$	Annual mean	31.12.2004
Sulphur dioxide	350 $\mu\text{g}/\text{m}^3$, not to be exceeded more than 24 times a year	1-hour mean	31.12.2004
	125 $\mu\text{g}/\text{m}^3$, not to be exceeded more than 3 times a year	24-hour mean	31.12.2004
	266 $\mu\text{g}/\text{m}^3$, not to be exceeded more than 35 times a year	15-minute mean	31.12.2005

2. Air Quality Management Area and further assessment

2.1 Air Quality Management Area (AQMA), Normandy Court, Dundonald

Lisburn & Castlereagh City Council’s Air Quality Management Area for Normandy Court in Dundonald was declared by Castlereagh Borough Council in 2011 prior to the amalgamation of Lisburn City Council and Castlereagh Borough Council in 2015. This was based on monitoring results from diffusion tubes which identified exceedences for the annual mean objective for nitrogen dioxide. The diffusion tubes were then relocated from the kerbside of the Upper Newtownards Road onto the façade of Normandy Court. National Physical Laboratory carried out a Detailed Assessment (DA) in June 2009. The purpose of this DA was to ascertain sensitive receptors and from this identify the extent of the AQMA.

The AQMA declared at Normandy Court, on the Upper Newtownards Road, is located at the traffic light junction of the Church Road and Ballyregan Road. Normandy Court is a relatively new block of flats, which were constructed in 2001. No other sensitive receptors are nearby.

The Upper Newtownards Road is the main arterial route for road traffic moving from Newtownards to Belfast City Centre. This area is a major bus route with buses moving from the new Park & Ride in Dundonald and the neighbouring council area of Ards and North Down to the centre of Belfast City. The flow of traffic during peak and off-peak times is busy, especially during school and commuting times. Heavy goods vehicles pass along this route accessing the city and servicing nearby industrial units.

The Park & Ride facility in Dundonald opened in 2014 and a new road layout was completed in 2018 creating a bus lane into the city centre, this coincided with the introduction of the new hybrid glider buses.

Figure 2. Picture of junction and Normandy Court apartments 2012



Figure 3. Normandy Court/Church Road junction (Glider Bus, new bus lane)



Figure 4. 2019 Normandy Court/Church Road junction



Figure 5. Aerial view of Normandy Court junction 2012



Figure 6 Aerial view of Normandy Court junction 2019 (with new bus lane)



Figure 7. Picture of triplicate diffusion tubes on façade of Normandy Court



2.2 Overview of Air Quality in Lisburn & Castlereagh City Council

Prior to local government reform in 2015, Castlereagh Borough Council completed a number of reviews and assessments of air quality in earlier rounds of the assessment process with reference to Normandy Court in Dundonald and the AQMA. These reviews and assessments are summarised in Table 2 below.

Table 2. Castlereagh Borough Council Air Quality Reports 2009-2014

Updating and Screening Assessment (USA) (CBC 2009)	This USA reported the 2008 data. The Dundonald NO ₂ diffusion tube for site A20 exceeded the objective, and a detailed assessment was initiated.
Detailed Assessment (CBC 2009)	A detailed assessment was carried out for NO ₂ for the A20 site in the Dundonald area
Progress Report (CBC 2010)	This Progress Report (PR) reported the 2009 data and the relocation of the NO ₂ diffusion tubes on the A20 to the façade of the relevant exposure i.e. Normandy Court
Progress report (CBC 2011)	This report highlighted the continued elevated levels of NO ₂ at Normandy Court Dundonald and details the AQMA Castlereagh Borough Council declared in January 2011.
Update and Screening Assessment (CBC 2012)	This reported the 2011 data and further details of the AQMA and action plan.
Progress Report (CBC 2013)	This reported the 2012 data and the submission of an action plan in January 2013.
Progress Report (CBC 2014)	This reported the 2013 data and details of the action plan progress

After local government reform in 2015 Lisburn & Castlereagh City Council completed the following reviews and assessments of Air Quality in earlier rounds of the assessment process.

Table 3. Lisburn & Castlereagh City Councils Air Quality Reports 2015-2021

LCCC 2015 - Update and Screening Assessment	This reported the 2014 data and levels within the AQMA which remained close to the objective and the opening of the new Park & Ride in Dundonald on 1 st December.
LCCC 2016 - Progress Report	This reported the 2015 data and the reduction of levels within the AQMA possibly due to the opening of the new Park & Ride
LCCC 2017 - Progress Report	This reported the 2016 data and the levels within the AQMA still remaining close to the objective.
LCCC 2018 - Update and Screening Assessment	This reported the 2017 data and the levels within the AQMA still remaining close to the objective possibly due to the extensive traffic issues caused by major road works to introduce a new bus lane for the rapid transport system.
LCCC 2019 - Progress Report	This reported the 2018 data and the reduction of levels within the AQMA possibly due to the growth in popularity of the Park & Ride and the introduction of the new rapid transport System in September 2018.
LCCC 2020 - Progress Report	This reported the 2019 data and the further reduction of NO ₂ levels within the AQMA
LCCC 2021 - Update and Screening Assessment	This reported the 2020 data and the further reduction of NO ₂ levels within the AQMA and the reduction in traffic flows due to the COVID 19 pandemic.
LCCC 2022 – Progress Report	This reported the 2021 data and the further reduction of NO ₂ levels within the AQMA

2.3 Lisburn & Castlereagh City Councils Air Quality Management Area

The AQMA declared in 2011 consists of the apartments on the façade of Normandy Court Dundonald i.e. no's 1, 5, 9, 2, 6 & 10. These apartments are situated on a main arterial route to Belfast City, and within 3 metres of the main traffic lights within Dundonald village.

The detailed assessment identified these apartments as the only receptors. The volume of traffic and their proximity to the traffic lights resulted in the objective for NO₂ being exceeded.

As it was not possible to change topography and physical structure of the road, other alternatives such as traffic reduction and traffic light phasing were considered prior to the introduction of the New Rapid Transport System in 2018.

Figure 8. Map showing position of AQMA in Dundonald Village

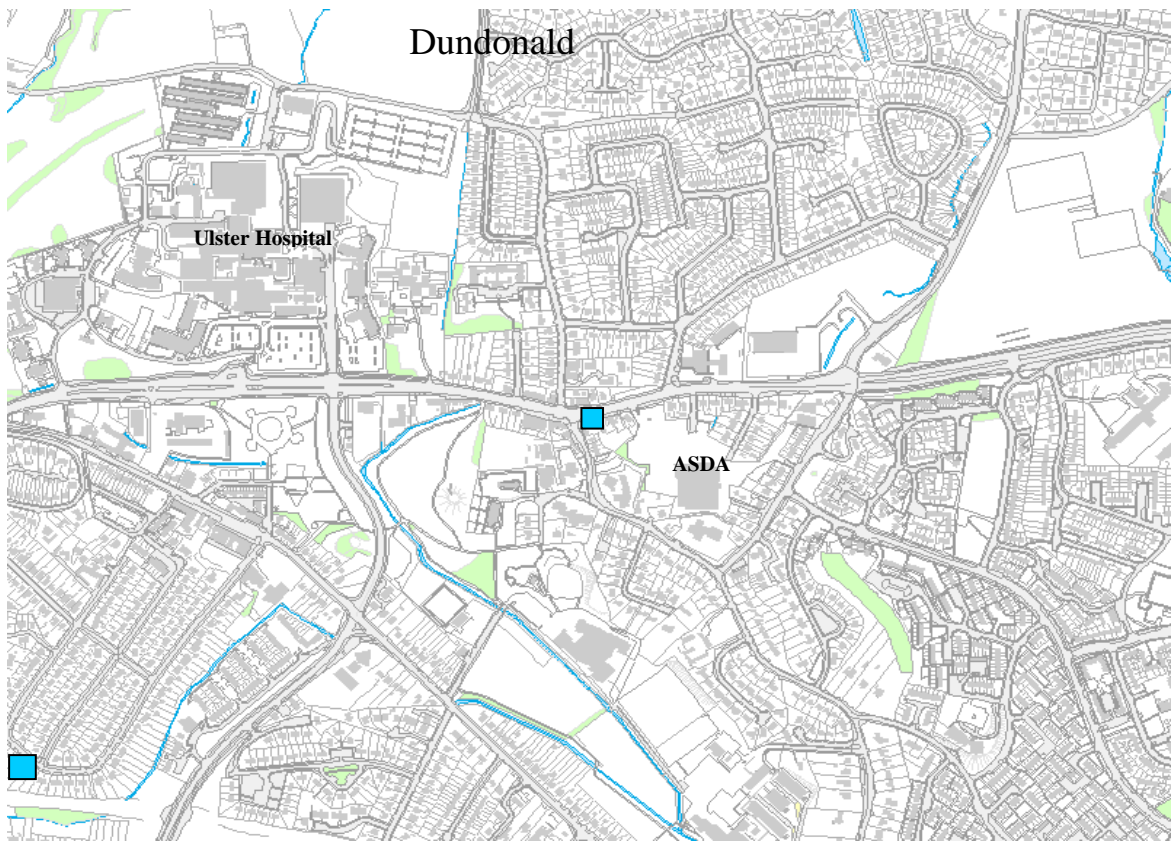
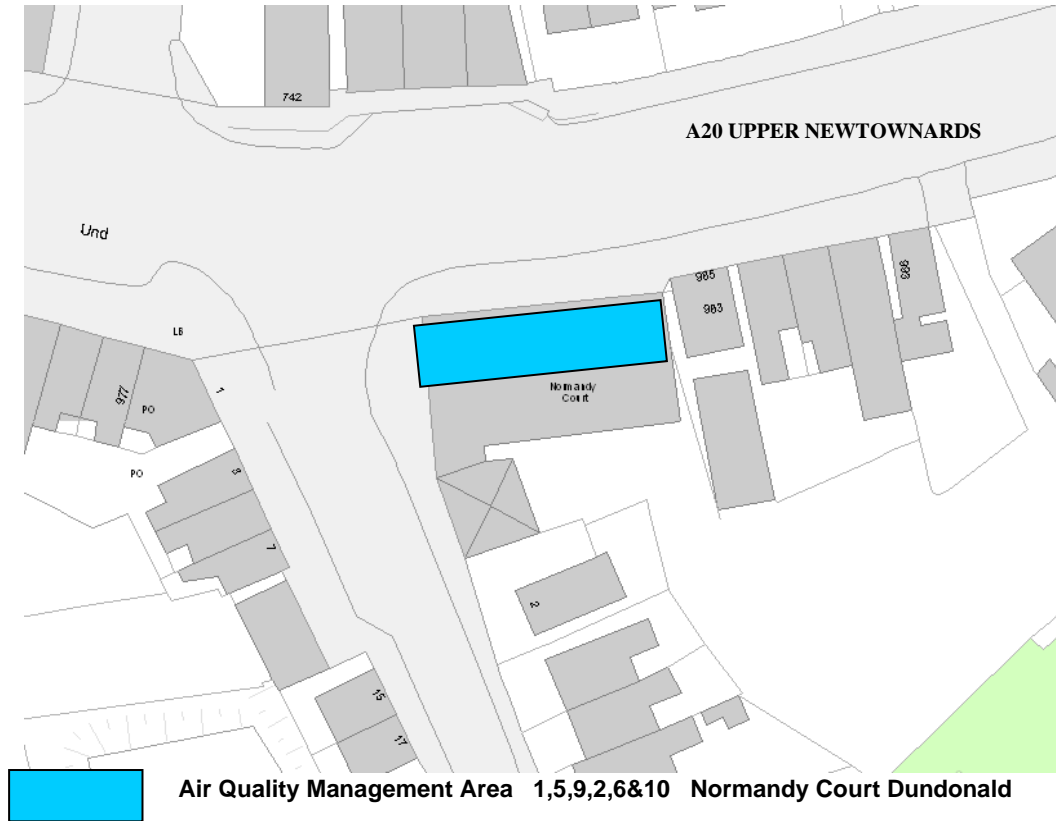


Figure 9. Map showing position of no's 1, 5, 9, 2, 6, & 10 Normandy Court



2.4 Monitoring Data

Lisburn & Castlereagh City Council presently have eighteen NO₂ diffusion tube sites and two automatic monitoring sites for NO₂, SO₂, PM₁₀ and PM_{2.5} within the Council area. The automatic NO₂ analyser in Dundonald is 30M from the AQMA and triplicate diffusion tubes are positioned on the façade of Normandy Court (the AQMA). A co-location for the NO₂ tubes is being carried out at the Dundonald station so that an accurate local bias adjustment factor can be ascertained, to ensure accurate data monitoring within the AQMA. The NO₂ diffusion tubes are supplied by Gradko, preparation method is 20% Triethanolamine (TEA) in water.

Table 4. Existing Air monitoring sites within Lisburn & Castlereagh City Council 2021

Location	Type	Coordinates	Coordinates	Pollutant	Ex	Measurement	Comments
Normandy Court Dundonald (AQMA)	Roadside	E341991	N374013	NO ₂	Y	Diffusion tube	Commenced November 2009. Within AQMA since January 2011
Newtownbreda Road	Roadside	E335246	N370061	NO ₂	N	Diffusion tube	Triplicate tubes
Saintfield Road	Roadside	E336832	N365625	NO ₂	N	Diffusion tube	
Antrin Road Lisburn	Roadside	E326313	N364621	NO ₂	N	Diffusion tube	
Benson Street Lisburn	Roadside	E326090	N364619	NO ₂	N	Diffusion tube	
Sloan Street Lisburn	Roadside	E327236	N364102	NO ₂	N	Diffusion tube	
Sprucefield Court Lisburn	Roadside	E327586	N363586	NO ₂	N	Diffusion tube	
Comber Road	Roadside	E341731	N373666	NO ₂	N	Diffusion tube	
Comber Road	Roadside	E341622	N373759	NO ₂	N	Diffusion tube	
Hillsborough	Roadside	E324404	N358876	NO ₂	N	Diffusion tube	
58-62 Main Street, Moira	Roadside	E314994	N360589	NO ₂	N	Diffusion tube	
Blaris Road Lisburn facade	Roadside	E325993	N362462	NO ₂	N	Diffusion tube	
Saintfield Road Lisburn	Roadside	E327810	N363609	NO ₂	N	Diffusion tube	
Moira Road Lisburn	Roadside	E324169	N363671	NO ₂	N	Diffusion tube	
Blaris Green/Drive	Roadside	E325883	N362501	NO ₂	N	Diffusion tube	
Knockmore Road	Roadside	E324883	N365180	NO ₂	N	Diffusion tube	
Cairnshill Park & Ride	Roadside	E335702	N368362	NO ₂	N	Diffusion tube	
Seymour Hill	Background	E328585	N368117	NO ₂	N	Diffusion tube	
Castlereagh Dundonald	Roadside	E341989	N374011	NO ₂	N	Automatic site for NO ₂ and PM ₁₀ . Diffusion tube co-location study also carried out	NO ₂ within 30M of AQMA
Kilmakee Seymour Hill Lisburn	Background	E328956	N367973	SO ₂ PM ₁₀ PM _{2.5}	N	Automatic site for SO ₂ and PM ₁₀ . And PM _{2.5}	Two DEFRA sites also located here monitoring PAH and black carbon

Results of air monitoring for nitrogen dioxide

Table 5. Monitoring results in relation to the AQMA in Dundonald for NO₂ 2008 to 2014 then within Castlereagh Borough Council

Location	Within AQMA?	Relevant public exposure? Y/N	Annual mean concentrations (µg/m ³)						
			2008	2009	2010	2011	2012	2013	2014
Normandy Court facade (diffusion tubes)	Y	Y	n/a	n/a	45	45	38	39	39
Normandy Court kerbside (diffusion tube)	N	Y	65.6	57.4	n/a	n/a	n/a	n/a	n/a
Castlereagh Dundonald (realtime analyser)			32.3	36	41	39	30	32	37

Comparison with Annual Mean Objective of 40 µg/m³

Table 6. Monitoring results in relation to the AQMA in Dundonald for NO₂ from 2015 to present for NO₂ in Lisburn & Castlereagh City Council

Location	Within AQMA ?	Relevant public exposure ? Y/N	Annual mean concentrations (µg/m ³)							
			2015	2016	2017	2018	2019	2020	2021	2022
Normandy Court facade (diffusion tubes)	Y	Y	34.75	39	40	34	31	23	26	24
Newtownbreda Road Castlereagh (diffusion tubes)	N	Y	34.10	33	31	32	31	23.7	30	29
Saintfield Road Carryduff (diffusion tubes)	N	Y	14.03	17	19	23	17	11	14	12
Seymour Hill (diffusion tubes)	N	Y	n/a	n/a	14	18	17	17	15	14
Antrim Rd Lisburn (diffusion tubes)	N	Y	26.51	29	27	30	27	20	21	21
Benson Street Lisburn (diffusion tube)	N	Y	24.62	27	26	28	26	18	19	20
Sloan Street Lisburn (diffusion tubes)	N	Y	29.81	34	26	32	28	23	25	25
Sprucefield Court Lisburn (diffusion tubes)	N	Y	32.27	37	39	38	34	26	29	28

Location	Within AQMA?	Relevant public exposure? Y/N	Annual mean concentrations ($\mu\text{g}/\text{m}^3$)							
			2015	2016	2017	2018	2019	2020	2021	2022
Comber Road (Comber side) (diffusion tubes)	N	Y	n/a	n/a	28	25	24	18	18	20
Comber Road (Belfast side) (diffusion tubes)	N	Y	n/a	n/a	29	28	23	17	18	19
Hillsborough (diffusion tubes)	N	Y	25.82	28	27	29	25	20	19	19
58-62 Main Street Moira (diffusion tubes)	N	Y	25.86	30	29	29	26	20	21	20
Blaris Road Lisburn facade (diffusion tubes)	N	Y	n/a	n/a	n/a	n/a	31 _a	24	30	30
Saintfield Road Lisburn (diffusion tubes)	N	Y	n/a	n/a	n/a	33	29	23	26	28
Moira Road Lisburn (diffusion tubes)	N	Y	n/a	n/a	25	25	23	17	20	17
Blaris Green/Drive (diffusion tubes)	N	Y	n/a	n/a	n/a	n/a	27	23	29	30
Knockmore Road (diffusion tubes)	N	Y	n/a	n/a	n/a	n/a	32	24	30	29
Cairnshill Park & Ride (diffusion tubes)	N	Y	n/a	n/a	n/a	n/a	n/a	20	25	23
Castlereagh Dundonald (real-time analyser)	N	Y	29	27	27	24	22	17	21	24

2.5 Sources of Emissions and Improvement required within AQMA

The Department for Environment, Food and Rural Affairs (DEFRA) guidance LAQM TG(16) (section 7.96) states that carrying out source apportionment to understand the contribution of all sources to the exceedances of the air quality objectives within a AQMA is important to identify priorities whilst preparing an AQAP.

The source apportionment work carried out in 2011 by Castlereagh Borough Council as part of the preliminary study for the action plan considered the following vehicle categories:

- Cars and Vans
- Light Delivery Vehicles (LDVs)
- Heavy Goods Vehicles (HGVs)

The assessment considered the percentage of the total traffic flow (for year 2009, completed by DRD, Roads).

Cars accounted for 87.7% of the total, light delivery vehicles (LDVs) 7.9% and the remaining 4.4% were HGVs.

Lisburn & Castlereagh City Councils latest assessment considering the percentage of the total traffic flow from the current data available from DFI (year 2017). HGVs accounted for 5% and all other vehicles made up 95%. Figure 9 below shows a breakdown of vehicle types passing the AQMA (i.e., Normandy Court, Dundonald A20).

Figure 10. Graph showing percentage of passing vehicle type

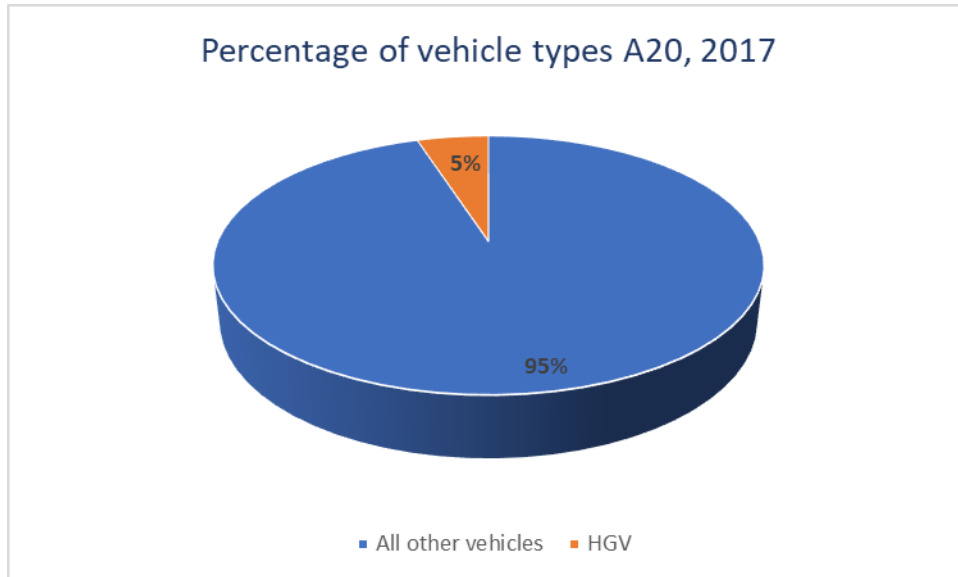
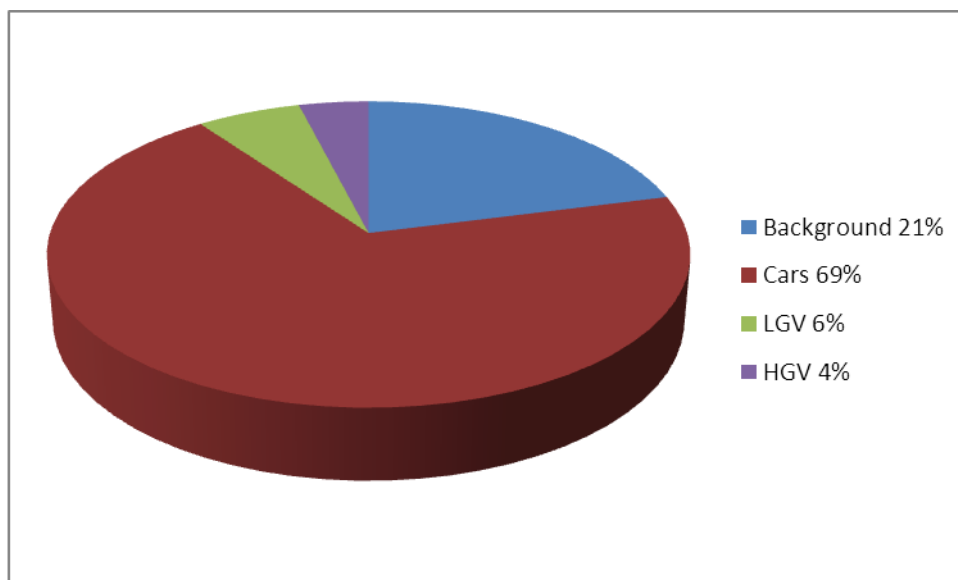


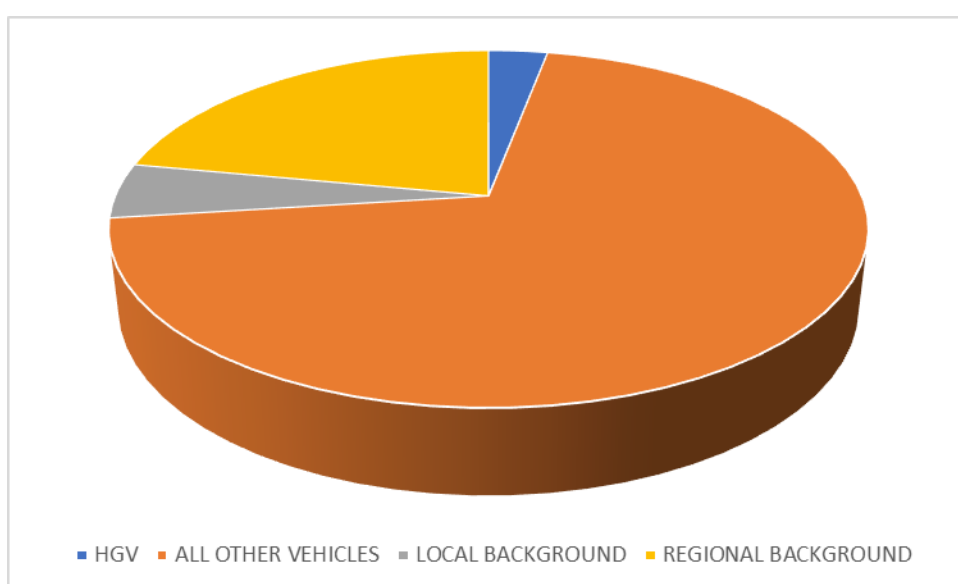
Figure 10 below shows the breakdown of the annual mean NO₂ concentration in the AQMA in 2010 (highest value 45µg/m³) with the AQMA being declared in 2011. The results indicate that traffic emissions contribute up to 79% of the total NO₂ concentration, the rest (21%) representing the background contribution from various sources around Dundonald village. Cars represent 69% of the total NO₂ emissions. LGVs 6% and HGVs contribute 4%.

Figure 10. Graph showing contribution of local sources to annual mean NO₂ concentration in the AQMA 2010



The next figure (Figure 11) shows the breakdown of the 2019 annual mean NO₂ concentration in the AQMA pre-COVID restrictions when traffic flows were reduced (highest value 31µg/m³). The results indicate that traffic emissions contribute up to 73% of the total NO₂ concentration, the rest representing the background contribution (27%). HGVs contribute 3% and all other vehicles 70%.

Figure 12. Graph showing contribution of local sources to annual mean NO₂ concentration in the AQMA 2019



2.6 Required Reductions in NO₂

A key part of the action planning process following the declaration of the AQMA, is to ascertain the minimum reduction of NO₂ required to meet the AQS objective limit within the AQMA.

In this reduction estimation study, the monitoring data from the NO₂ triplicate diffusion tubes situated on the façade of Normandy Court, Upper Newtownards Road, Dundonald for 2010 were used, and the information was put into the NO_x calculator on the UK Air Quality website, <https://www.airqualityni.co.uk/laqm/laqm-tools>. Nitrogen oxides (NO_x) is a collective term used to refer to nitrogen monoxide (nitric oxide or NO) and nitrogen dioxide (NO₂). Background levels are expressed in terms of NO_x and NO₂ and both these are applied to the calculator to identify the required level reduction.

Information fed into the NO_x calculator

- Year of interest 2010
- Site location is Normandy Court, Upper Newtownards Road Dundonald (341991,374013)
- Concentration measured at location was 45µg/m³.
- Using background maps background concentrations of NO_x and NO₂ are 13.3µg/m³ and 9.44. This was the background concentration for local 1kmx1km grid square 341500,374500.

Steps taken to determine required reductions

Step 1

Enter 45µg/m³ into NO₂ to NO_x calculator. Enter background concentrations into calculator. Run calculator.

Local Authority:		Castlereagh	
Diffusion tube NO ₂ , µg m ⁻³	Background µg m ⁻³		Road NO _x , µg m ⁻³
	NO _x	NO ₂	
45	13.3	9.44	85.82

Road NO_x contribution that will result in 45 µg/m³ of NO₂ is 85.82µg/m³

Step 2

Enter 40µg/m³ NO₂ to NO_x calculator and background concentrations into calculator. Run calculator.

Local Authority:		Castlereagh	
Diffusion tube NO ₂ , µg m ⁻³	Background µg m ⁻³		Road NO _x , µg m ⁻³
	NO _x	NO ₂	
40		7.01	76.7

Road NO_x contribution that will result in 40µg/m³ of NO₂ is 76.7µg/m³.

Step 3

Therefore, required reduction is Step 1 NO_x minus Step 2 NO_x.

$85.82\mu\text{g}/\text{m}^3 - 76.7\mu\text{g}/\text{m}^3 = 9.12\mu\text{g}/\text{m}^3$

Expressed as % $(9.12/85.82 \times 100) = \mathbf{10.6\% \text{ reduction in Road NO}_x \text{ required to achieve } 40\mu\text{g}/\text{m}^3 \text{ NO}_2 \text{ objective.}$

This represents a significant reduction target based on the 2010 results. In 2013 the Action Plan could only be categorised as being 'in pursuit' of achieving it.

This reduction in road NO_x was achieved between 2012-2017, however during this period results remained static just under the 40 $\mu\text{g}/\text{m}^3$ objective. Climatic conditions may have had a contributing factor to this reduction in 2012 and 2013, and the opening of the Park & Ride at Quarry Corner Dundonald in 2014 helped NO_x levels remain at this level.

The monitoring results 2018-2019 showed a noticeable 31% reduction in NO_x compared to the 2010 results within the AQMA. This indicates that the Park & Ride in Dundonald and the EWAY Rapid Transport System have had the most significant impact on improving the Air Quality at Normandy Court.

LCCC have been unable to determine the continuing trend in reduction of NO_x in 2020 due to the impact the COVID19 pandemic has had on traffic flows and reduced vehicle emissions.

3. RELEVANT PLANS AND POLICIES**3.1 Regional Development Strategy**

The Northern Ireland Regional Development Strategy (RDS) 2035 was published in 2012. This strategy aims to take account of the economic ambitions and needs of the region, and put in place spatial planning, transport and housing priorities that will support and enable the aspirations of the region to be met.

The Spatial Framework within the RDS 2035, and supporting guidance in Chapter 3 of the Strategy, are designed to deal with the major issues of climate change, population growth and movement, transportation and how investment should be focused on the main hubs and clusters.

There are two types of Strategic Guidance outlined in Chapter 3, the Regional Guidance (RG) and the Spatial Framework Guidance (SFG). Within the Strategy, Policy RG2 sets out the framework to deliver a balanced approach to transport infrastructure and promotes the more efficient use of road space using continued investment in public transport and infrastructure, such as Park & Ride, to encourage motorists to take the bus for the main part of their journey. RG2 is a key consideration to this action plan.

3.2 Regional Transportation Strategy

The Regional Transportation Strategy (RTS) for Northern Ireland 2002- 2012 identified strategic transportation investment priorities and considers potential funding sources and affordability of planned initiatives. The RTS focuses on three geographic areas and one overlying Network. These are as follows:

- Belfast Metropolitan Area (BMA), containing the continuous area comprising Belfast City Council and the built-up areas within the Council areas of Carrickfergus, **Castlereagh**, Lisburn, Newtownabbey and North Down.
- Other Urban Areas (OUAs): collectively those towns described as main or local hubs in the RDS.

- Rural Area – the remainder of Northern Ireland; and
- Regional Strategic Transport Network (RSTN) comprising the complete rail network and all motorway and trunk road links (including the Key Transport Corridors and Link Corridors).

The RTS is a “daughter document” of the Regional Development Strategy (RDS), which sets out the spatial development framework for Northern Ireland up to 2025. Implementation of the Strategy will be through three Transport Plans covering the Regional Strategic Transport Network (RSTN), the Belfast Metropolitan Area (BMA), and the Sub-Regional Transport Plan (SRTP).

A revised strategy document, Ensuring a Sustainable Transport Future - A New Approach to Regional transportation, was published in 2012. This complements the RDS 2035 and aims to achieve its vision for transportation. One of its main Strategic Objectives is to “improve connectivity within the region” by completing the work identified in the current RSTN Transport Plan and Strategic Road Improvement Plan.

3.3 Regional Strategic Transport Network Transport Plan

The RSTN Transport Plan prepared by The Department for Infrastructure covered the complete rail network, five Key Transport Corridors (KTCs), four Link Corridors, the Belfast Metropolitan Transport Corridors and the remaining trunk network across Northern Ireland. The Plan is based on the guidance set out in the Regional Development Strategy (RDS) and the Regional Transportation Strategy (RTS), as described in Section 3.1 and 3.2 above.

The RSTN Transport Plan consists of proposals for transport schemes and measures for the maintenance, management and development of the RSTN. The RSTN Transport Plan also includes a number of measures for rail, bus, road, walking and cycling.

4. Proposed Measures to Improve Air Quality Within AQMA

4.1 Proposed measures

Northern Ireland Councils amalgamated in 2015 and the original 2013 Action plan for Normandy Court Dundonald now falls within Lisburn & Castlereagh City Council. As discussed previously the main contributor to NO₂ pollutants is road transport. The responsibility for managing the road network falls within the remit of the Department for Infrastructure, Roads and the provision of public transport is managed mainly by Translink. Therefore, both these organisations have an important role to play in the Action Planning process to ensure there is a reduction in NO₂ levels within the AQMA. In 2012 a number of actions were proposed for working towards improving air quality in the AQMA at Normandy Court, Dundonald.

4.1.1. Network Management

Traffic lights are present at the junction of Normandy Court. Normandy Court is situated on the corner junction of the Upper Newtownards Road and Church Road Dundonald. The Upper Newtownards Road is the main thoroughway for traffic from Newtownards to Belfast City centre. Traffic backs up during the red light phase at this junction and as there are buildings either side of the carriageway, this can reduce dispersal causing an increase in NO₂ from road vehicles.

In 2012 DRD Roads Service investigated the possibility of extending the green light phase at these lights to help improve traffic movement through the junction. However, they were concerned if they alter the timing of the light phase at this junction, it may have other implications such as:

- Pedestrians waiting a longer period of time to cross the junction
- Traffic waits longer at other legs of this junction
- A possible detrimental effect on other junctions/traffic lights towards the City Centre
- There was also no guarantee that the timing change will improve the air quality issue at this junction.

DRD Roads Service therefore believed that the junction was already operating at its most optimum and did not recommend any alterations at this junction.

4.1.2. Traffic Lanes

In 2012 in Dundonald there were two lanes of traffic flowing in either direction. Just past Normandy Court towards Belfast city centre, vehicles were permitted to park on the inside lane during non-peak hours. It was suggested that if both lanes were available at all times this may improve traffic movement along the Upper Newtownards Road and therefore reduce a build up of traffic at Normandy Court. DRD Roads Service indicated that the traffic flow during non-peak times was not an issue and also with the current timings of the traffic lights this option would be unlikely to have any improvement on the air quality.

In 2018 a new road layout was completed to accommodate the new Rapid Transport System. This incorporated a designated bus lane through Dundonald and parking was no longer permitted on the inside lane, although there were still two lanes at Normandy Court AQMA. The inside lane was mainly used for those vehicles turning left and the build up of traffic at peak times moved to the outside lane further from Normandy Court.

4.1.3. New Road/Network Plans

In 2012 DRD Roads Service informed the Council that there are no immediate or long-term plans for the development of any new roads or junctions around the Dundonald area, which may have a positive effect on air quality in this area.

4.1.4. Lisburn & Castlereagh City Council Fleet

Lisburn & Castlereagh City Council are currently operating approx. 160 vehicles on a daily basis. Only two of which are cars, and the rest are all commercial.

We are currently utilising 1 electric vehicle, however, there is a greater initial cost and we have no infrastructure to support multi-site charging. Furthermore, due to the age of the vehicle/battery it has a limited range. On the larger vehicles, which make up the majority of the fleet, electric is not a suitable replacement option as the current power supply to the depot would not support multivehicle use.

We are continuing to investigate alternative fuels to reduce emissions and running costs and we ensure that all vehicles purchased are Euro 6 standard.

4.1.5. Translink Bus Fleet

Buses play an essential role in providing public transport alternatives to the car, and an efficient use of road space and fuel when operating efficiently.

Public Transport buses and trains in Northern Ireland are operated by Translink. Their mission is to deliver a transformation in public transport by providing integrated services which connect people, enhance the economy & improve the environment.

In 2012 Translink confirmed:

Initiatives within the Bus Division of Translink include:

- Specification of vehicle
- Technological solutions
- Driver training

Specification of Vehicle

Provision of seated transport for children has taken a very high priority as the safety benefits have been highlighted over the past few years. As such, Translink has been involved in close liaison with vehicle manufacturers to design vehicles that maximise seating capacity whilst retaining good accessibility for passengers with disabilities.

Maximising seating capacity improves efficiency in terms of operational costs, wholelife footprint and fuel usage, as the number of vehicles required to provide transport to a given number of people reduces. Whereas a typical low-floor single deck bus has a seated capacity of approximately 44, high capacity single-deck vehicles designed to Translink's unique criteria have seated capacities of between 55 and 63 depending on the model.

Translink have also increasingly specified double-deck vehicles, where seating capacities are at least 75. Whilst these vehicles may use more fuel than typical lowfloor single deck buses, the increase in capacity represents a significant efficiency gain.

Technological Solutions

New vehicles procured by Translink now meet Euro 5 emissions standards. As well as representing a significant reduction in NOx emissions compared to Euro 3 vehicles, Euro 4 and 5 vehicles show fuel efficiency savings. This is due to a combination of factors including automatic idle shut down.

In 2022 Translink confirmed with Lisburn & Castlereagh City Council the following:

“Q3 Bus fleet improvements planned in the next 5 years and made in the last 5 years

In the last 5 years Translink has invested heavily in the renewal of its fleet. During that period, we made significant improvements to the Goldline network through the introduction of 157 Goldline vehicles. In the same time period, the 32 Gliders have entered service on the popular BRT corridors, and we have also introduced 43 vehicles on the new Urby service. On top of these we have continued to renew our fleet, replacing older Euro 3 and 4 vehicles with 273 modern low emission vehicles. A key milestone achieved has been the introduction of the first 3 zero emission hydrogen vehicles into service in December 2020.

Looking ahead we will be introducing 100 zero emission vehicles into Belfast and Foyle Metro within the next 12 months. Translink have a fleet strategy to have transitioned all of the Metro services to zero emissions by 2030 and across the whole network by 2040. The continued renewal of our older fleet with low and zero emission vehicles across the network will drive our fleet renewal programme over the next 5 years. “

Driver Training

In 2022 Translink confirmed with Lisburn & Castlereagh City Council the following:

“Translink has commenced a programme to train 80 Mentor Drivers throughout the network who will in turn encourage other drivers to drive in a fuel-efficient manner. Training focuses on avoiding unnecessary acceleration, reading the road ahead and driving accordingly.

This programme will be delivered in-house using Translink’s Driving School. The programme is reinforced by a CPC-accredited course delivered to all drivers which explains the theory of fuel-efficient driving.

We piloted a mentor program pre-covid that proved successful with the mentors and candidates, so we had planned to roll this out to all mentors. However, COVID and lack of resources intervened and now roll out is likely to be the end of this year.”

Bus Fleet within the AQMA

Table 7. The total number of buses travelling through the AQMA daily (Mon-Fri)

Outward - to Dundonald through AQMA

Location	Dundonald Park & Ride	Newtownards	Newtownards	Portaferry
Bus	Glider Service G1	Ulsterbus 7	Ulsterbus 5	Ulsterbus 9/10
No's	123	14	16	12

Total outward buses: 165

Inward - from Dundonald through AQMA

Location	Dundonald Park & Ride	Newtownards	Newtownards	Portaferry
Bus	Glider Service G1	Ulsterbus 7	Ulsterbus 5	Ulsterbus 9/10
No's	122	13	14	9

Total Inward buses: 158

The following table (Table 8) provides information on the 2 bus depots that service the Dundonald area. Not all the Ulsterbuses will travel through the AQMA, but it will provide an understanding of the percentage of buses which are Euro 3 or better for these depots.

Table 8. Euro classification of Translink buses

Depot	No. of Vehicles	Pre Euro	Euro 1	Euro 2	Euro 3	Euro 4	Euro 5	Euro 6
Great Victoria St	60	0.00 %	0.00 %	0.00 %	13.33 %	8.33%	26.67 %	51.67%
Newtownards	49	0.00 %	0.00 %	0.00 %	26.53 %	20.41 %	14.29 %	38.78%
Glider	34	0.00 %	0.00 %	0.00 %	0.00%	0.00%	0.00%	100.00 %

4.1.6. Lisburn & Castlereagh City Council sustainable travel plans

Lisburn & Castlereagh City Council continue to participate in the cycle to work scheme to introduce and encourage employees within the Council to consider using a more sustainable form of transport to work. LCCC is also developing strategies to promote blueways and greenways to make the area more active transport friendly.

The Local Development Plan 2032 also sees the Council's commitment to addressing climate change by encouraging the growth of sustainable transport including active travel, improving the design and layout of buildings and encouraging development in the most accessible places. Finally, the development of the Lisburn orientation and walkability strategy plans to enhance the signage across the city centre to encourage everyone to use more active forms of transport.

4.1.7. Park & Ride Scheme in Dundonald

In 2012 a key element of the Belfast Metropolitan Transport Plan (BMTP) 2015 was the provision of a Park & Ride facility at Millmount in Dundonald that would have complemented the proposed route of the EWAY bus rapid transit scheme. Since the BMTP was published in 2004, DFI secured the lands required for the Park & Ride at Millmount but the emerging preferred route option for EWAY changed. Following the public consultation on route options they elected for a Park & Ride facility at Quarry Corner instead to serve the EWAY.

The Census in 2009 indicated that there was a daily through flow of 23,310 vehicles passing Quarry Corner and the majority of these vehicles would pass through the AQMA at Normandy Court. The Park & Ride scheme is located outside of the AQMA, however such a scheme could significantly reduce the volume of traffic passing through the AQMA, therefore having a positive impact on the air quality. A survey carried out by DFI Roads indicated a possible reduction in road traffic vehicles by 20%.

The Park & Ride at Quarry Corner was completed by the DFI on 1st December 2014 and the Rapid Transport System in September 2018. The Park & Ride slowly grew in popularity and soon after the completion of the Rapid Transport System (Glider Bus) it was operating at capacity most days. In 2021 LCCC discussed with DFI if there were any plans to extend the Park & Ride, they replied that no scope existed to extend the current site within Dundonald as there was no suitable land available. In terms of additional facilities, the Department is currently developing new park and ride options in both Newtownards and Comber. The delivery of these schemes would help to reduce demand in Dundonald, however, they are subject to the successful acquisition of land and securing capital funding.

4.1.8. Eway Rapid Transit Scheme

The implementation of a bus based rapid transit scheme known as the Eway in the Newtownards Metropolitan Transport corridor (MTC) within the BMA plan, was to be the first rapid network scheme. The scheme was to facilitate the re-use of the former Comber railway line to provide fast, efficient, safe and comfortable transport to Belfast City centre. In 2011 the proposal changed as the old railway line had already been re-used as a pedestrian, cycle route "Comber Greenway" and in 2012 an alternative route from Dundonald along the Upper Newtownards Road was planned for the Rapid Transit Scheme. Construction commenced in 2014 and completed in 2018 with a new hybrid Glider Bus introduced and a designated bus lane to and from the Belfast City centre.

4.1.9. Air Quality in Planning and Biodiversity

New developments have the potential to effect air quality, particularly developments in close proximity to the AQMA. Environmental Health are consulted on all planning applications received by the Council in the Dundonald area, ensuring that all relevant air quality issues are highlighted and mitigation measures are considered where necessary.

Billy Neill MBE Country Park Project

The Council has planned to plant 20,500 native trees in Billy Neill MBE Country Park, to support the Council's actions to mitigate against climate change and to enhance biodiversity within the park.

Woodland Trust Project

The Council is taking part in Woodland Trust projects to achieve the following improvements:

- To create a sustainable source of native IUKSG trees for the Lisburn & Castlereagh City Council area to ensure that the trees it grows are of a high biosecurity standard.
- To mitigate against the effects of Ash dieback present within in the Council area.
- To repurpose and develop Council nursery facilities to enable them to supply the trees required to support the wider tree planting and outreach projects.
- To support the Woodland Trust's Community Tree Packs program in Northern Ireland.

To achieve a reduction in the Council's carbon footprint by growing and planting locally produced trees and thus reduce the transportation requirements which is created by importing tree stock.

4.1.10. Travelwise NI

Travelwise NI was a DFI initiative launched in 2012 to encourage sustainable transport options such as walking, cycling, public transport or car sharing, Travelwise NI has subsequently been replaced by new strategies and initiatives. In 2022 the DFI Active Travel branch informed LCCC of the following strategies relevant to sustainable travel:

- The Bicycle Strategy for Northern Ireland published in August 2015 envisaged 'a community where people have the freedom and confidence to travel by bicycle for everyday journeys' and it set out the ambition to increase the number of people regularly walking and cycling.
- The Bicycle Strategy identified three pillars one of which is to build a comprehensive network for bicycles. The Strategy will contribute to improvements in the physical environment. Increased levels of cycling can contribute to reduced congestion, improved air quality, less noise pollution and a cleaner environment.
- The Bicycle Strategy was followed in 2016 by the Strategic Plan for Greenways. The aim of this Strategic Plan is to encourage a substantial increase in the number of people walking and cycling as a regular part of everyday life through the building of a connected and accessible regional greenway network which significantly increases the length of traffic free routes.
- The Strategic Plan for Greenways flows from a number of other Departmental strategies and policies such as the Regional Development Strategy 2035 and 'Ensuring a Sustainable Transport Future – A New Approach to Regional

Transportation’ with its focus on sustainability in travel choices. It is also relevant to the Public Health Agency’s ‘Making Life Better 2012 – 2023’ strategy (published in 2014) which supports increasing opportunities for walking and cycling, the Outdoor Recreation Action Plan and the strategy for Sport and Physical Recreation.

- The most recent plan to come from the Bicycle Strategy is the Belfast Cycling Network Delivery Plan. This is to guide the development & operation of bicycle infrastructure in the city for the next 10 years by identifying the key schemes throughout the city, with a particular focus on those areas where there is currently little separated or traffic-free infrastructure. It also identifies those schemes that link pieces of isolated infrastructure into a more coherent network of routes. It also sets out strategic approaches to delivery. The timescale for delivery of each project will be refined as each project is designed, consulted upon and constructed.
- This Belfast network aims to provide safe and attractive space which will give people the freedom and confidence to cycle whether by providing segregated infrastructure on the public road, traffic-free paths through parks or quiet streets where motor traffic volumes are very low and the speed of traffic is appropriate to the quiet nature of the area.
- Over 50 individual schemes are planned for the greater Belfast area including trialling new routes.

4.2 Air Quality Impact Assessments

To evaluate the proposed measures, we assessed each measure in terms of:

- Potential air quality impacts (reduction in emissions or concentrations)
- Cost of the measure
- Wider, non-air quality

The following table (Table 9) has been used to score the cost and impact as well as determine a timescale, the score has been inserted into the AQAP in Table 10.

Table 9 Impact Assessment scoring

Costs		Beneficial Impact on Air Quality		Timescale	Years
Score	£				
7	< 100K	10 ↓ ↓ ↓ ↓ ↓ ↓	Highest	Short (S)	1-2
6	100 – 500K		↓	↓	
5	500k – 1 million		↓	↓	
4	1-10 million		↓	↓	
3	10-50 million		↓	Medium (M)	3-5
2	50-100 million		↓	↓	
1	>100 million	1	Lowest	Long (L)	6+

Table 10. Actions

Actions in 2023	Lead Authority	Impact	Time Scale	Status	Impact	Cost	Cost Effective Score	Outcomes
1. To review the existing 2012 Action Plan created by Castlereagh Borough Council	LCCC	Leading to the review of the AQMA Normandy Court, Dundonald	S	I	4	7	28	Review all actions within the existing Action Plan and the impact they have had. To update all actions within the Action Plan. Updates found in annex
2. Council vehicle fleet - Improving Euro Emissions	LCCC	Improving air quality with low emission vehicles	L	O	2	6	12	LCCC will continue to try and improve vehicle emissions when purchasing new vehicles
3. Continue to improve the bus fleet by providing Eco- driver training.	Translink	Reduced vehicle emissions with improved driving skills	M	O	1	7	7	Translink provide Eco-driver training and roll out a mentor programme. LCCC will continue to monitor air quality
4. Continue current practice of purchasing low emission vehicles on fleet renewal	Translink	Reduced emissions from buses in AQMA	M	O	3	5	15	Purchase low emission vehicles on replacement/ renewal. LCCC will continue to monitor air quality
5. Improve the transport network and efficiency.	Translink	Lower emissions from buses and a significant reduction within the AQMA which is within the new Belfast Rapid Transport (BRT) corridor.	M	O	6	3	18	To continue with improvements to the transport network with newer vehicles and more efficient routes, continuation of the new glider buses in the BRT corridor. LCCC will continue to monitor air quality

6. Introduction of zero emission hydrogen vehicles.	Translink	Zero emissions from a number of metro buses	L	O	6	1	6	3 new hydrogen buses are now included in the fleet with all of the metro line to be zero emissions by 2030
7. Park & Ride Schemes in neighbouring towns to the AQMA Newtownards and Comber	The Department for Infrastructure (DFI)	Reduced Vehicle emissions as better use of public transport	M	O	4	2	8	DFI Roads to develop new park and ride options, however, they are subject to the acquisition of land and securing capital funding.
8. Rapid Transport system	DFI	Reduced no. of vehicles on the road therefore reduced emissions	L	O	6	3	18	Continued operation of Glider bus and continued service through the AQMA to the city centre and improved lower emission bus fleet using this route.
9. Comment on planning applications that are relevant to the AQMA and encourage biodiversity projects	LCCC	Help reduce air quality issues in around the AQMA	S	O	1	7	7	LCCC will continue to monitor air quality Planning applications responses consider AQ impacts Biodiversity projects planned.
10. Sustainable Travel Strategies	DFI Active Travel Branch	Increased use of sustainable methods and therefore improving air quality	S	O	1	7	7	On going air quality initiatives by DFI LCCC will continue with air quality monitoring
11. Continued monitoring of NO2 levels within the AQMA with a review to revoking	LCCC	Report on decreasing levels within the AQMA	S	I	1	7	7	LCCC aim to revoke AQMA should levels remain low for 5 consecutive years, excluding 2020/21, being the COVID year.

5. Consultation

It is important for the success of the Action Plan to seek involvement from all local stakeholders including local residents, community groups and local businesses in order to share knowledge about the issues and hopefully gain support for the final measures proposed.

In 2012 a number of discussion/meetings were held with the Strategic Partners and other agencies in developing the action plan. Table 11 shows details of these discussion/meetings. The following is a list of statutory and non-statutory consultees to which the draft Plan was sent:

- Department of the Environment/the Northern Ireland Environment Agency;
- Department for Regional Development;
- Castlereagh Borough Council Councillors and Officers;
- Neighbouring local authorities;
- Relevant community groups and businesses within the AQMA;
- Other relevant local stakeholders.

All comments from both statutory and non-statutory consultees received on the draft Action Plan were considered and incorporated where appropriate into the final Action Plan. The Plan was presented to Castlereagh Borough Council for endorsement and subsequently placed on the Northern Ireland Air Quality website at <http://www.airqualityni.co.uk/reports>.

All relevant Departments have been contacted in 2022 for updates to contribute to this Action Plan

5.1 Implementation and Monitoring

Since the amalgamation in 2015 Lisburn & Castlereagh City Council has continued to work on the Action Plan measures, in partnership with the other relevant agencies, to secure the necessary air quality improvements.

The implementation and effectiveness of the Action Plan has continued to be carefully assessed through long-term monitoring of NO₂ at relevant receptor locations within the AQMA.

There have been regular review and assessment of the action plan proposals to evaluate progress and this is reported annually as part of the LAQM Action Plan Progress Report.

Table 11. Log of meetings and discussions with other agencies and partners

Date	Event	Agenda
27/10/10	Meeting with EGEHC	Air Quality Issues and proposals
19/11/10	Contact with DRD Roads on AQMA	Informing on Proposal to declare AQMA and consideration for improvements
19/11/10	Meeting with EGEHC	Discussion on declaration of AQMA
16/12/10	Meeting with EGEHC	Final discussion for proposal and Council seal for AQMA
25/01/11	Belfast City Council	Air Quality Forum Meeting
01/02/11	Meeting with Translink	Discussion on Translinks involvement
04/02/11	Meeting with Travelwise	Discussion as to Travelwise and their involvement on improvements to air quality
16/03/11	AQMA Action Plan meeting with EGEHC	Progress Report
13/06/11	AQMA action plan meeting EGEHC	Progress meeting and consideration on actions
08/09/11	Meeting with DOE	Progress and possible measures/actions for improvement
18/11/11	AQMA action plan EGEHC	Progress meeting
08/02/12	Strategic Stakeholder Discussion Translink	Discussion on Bus fleet in AQMA
15/02/12	Strategic Stakeholder Discussion DRD Roads	Discussion o possible improvement measures
07/03/12	AQMA Action Plan meeting with EGEHC	Discussion on draft action plan and further issues
11/05/21	Discussion with Active Travel branch DFI	Discussion of initiatives within LCCC to reduce congestion, pollution and obesity
09/08/21	Discussion with Eastern Division Roads DFI	Discussion on extending the Park & Ride in Dundonald
24/08/21	Discussion with DFI Translink	Discussion on bus fleet improvements
24/01/22	Discussion with DFI Translink	Update on Driver training and bus service through AQMA

ANNEX A. Update of Actions from the 2012 Action Plan produced by Castlereagh Borough Council

Actions in 2012	Lead Authority	Impact	Time Scale	Status	Impact	Cost	Cost Effective Score	2012 Update on actions	2023 Update on actions
1. Investigate the efficiency of the traffic lights at the junctions of Upper Newtownards Road and Church Road	2012 DRD Roads Service (NI) 2022 DFI	Less congestion and faster speeds at junctions leading to a reduction in NO2 levels	S	I	3	7	21	Roads Service responded to this action. Response indicated a change in times may well have a detrimental affect elsewhere and that the timings were already at its most optimum.	This has not changed and timings remain at their optimum
2. Investigate the efficiency of having both lanes of traffic operational at all times and not just peak times.	2012 DRD Roads (NI) 2022 DFI	Reduction of traffic building up around Normandy Court and therefore reducing NO2 levels	S	I	2	7	14	Roads Service investigated this option and indicated that traffic during off peak times does not present an issue.	This action is no longer relevant as parking on the road is not permitted at any time as the inside lanes are now a designated bus lane and traffic is mostly restricted to the outside lane.
3. Alternative planning routes/bypass of Dundonald village	2012 DRD Roads (NI) 2022 DFI	Reduction in traffic and therefore reduction in NO2 levels	L	O	3	5	15	Roads Service indicated that no immediate or long-term plans to develop a bypass or improve traffic lanes.	There are still no immediate or long-term plans to develop a bypass, with the introduction of the Rapid Transport System the most efficient road layout has been constructed.
4. Council vehicle fleet- Improving Euro Emissions	2012 Castlereagh Borough Council 2022 LCCC	Improving air quality with Euro 5 Vehicles and consideration of alternative environmentally friendly fuels	M	O	2	6	12	Castlereagh Borough Council will continue to try and improve vehicle emissions when purchasing new vehicles	In 2015 Councils amalgamated and the Castlereagh Borough Councils AQMA now falls within LCCC who continue to try and improve vehicle emissions when purchasing new vehicles
					30				

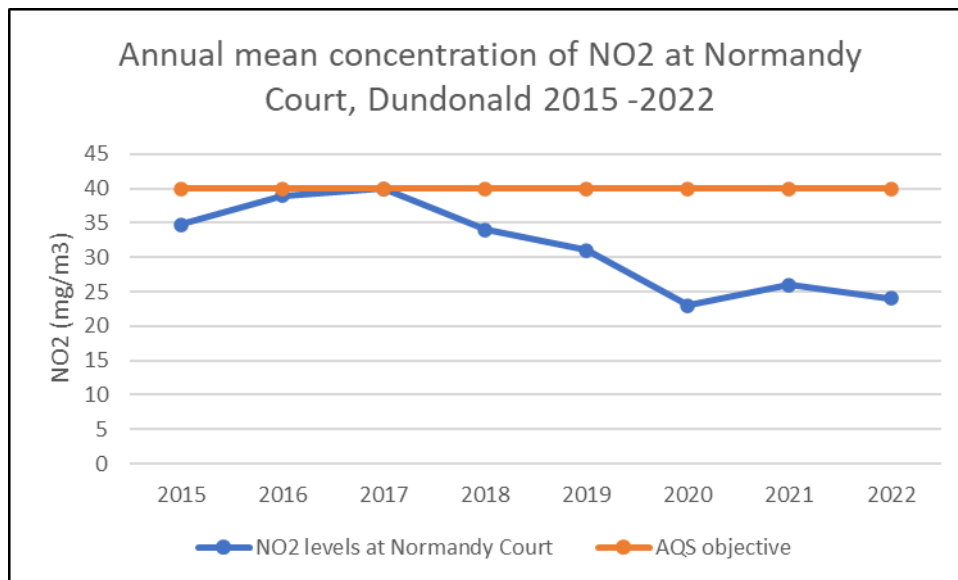
5. Continue to improve the bus fleet by providing Eco- driver training an installation of driver monitoring devices	Translink	Reduced	M	O	1	7	7	Translink will continue to replacement/renewal. CBC will continue with air quality monitoring	Translink continue to provide Eco-driver training and roll out a mentor programme. LCCC will continue with air quality monitoring
6.Improve the bus fleet by providing Eco-driver training an installation of driver monitoring devices Continue current practice of purchasing Euro 5 vehicles on fleet renewal	Translink	Emissions from buses in AQMA	M	O	1	7	7	Purchase Euro 5 vehicles on replacement/renewal. CBC will continue with air quality monitoring	Purchase Euro 5 vehicles on replacement/renewal. LCCC will continue with air quality monitoring
7. Council to implement a sustainable transport method scheme for employees	2012 Castlereagh Borough Council 2022 LCCC	Reduced Vehicle emissions	S	O	1	7	7	Castlereagh Borough Council will assess employee's needs and suggest other sustainable means of transport.	LCCC will continue to promote sustainable means of transport
8. Park & Ride Scheme at Quarry Corner Dundonald	2012 DRD Roads Service (NI) 2022 DFI	Reduced Vehicle emissions as better use of public transport	S	O	4	4	16	DRD Roads to purchase land and operate P&R scheme. This is hoped to be in operation within the next 2 years	DRD Roads completed the Park & Ride at Quarry corner on 1 st December 2014 which now falls under The Department for Infrastructure.

9. Eway Rapid Transport system	2012 DRD Roads service NI 2022 DFI	Reduced no. of vehicles on the road therefore reduced emissions	L	O	4	3	12	DRD roads in consultation process for introduction of system. Likely to be 5 years before system in place	Construction commenced in 2014 and completed in 2018 with a new hybrid Glider Bus introduced and a designated bus lane to and from Belfast city centre. This has had the desired result in reducing NO ₂ within the AQMA
10. Comment on Planning applications that are relevant to the AQMA and encourage biodiversity projects	2012 Castlereagh Borough Council 2022 LCCC	Help reduce air quality issues in around the AQMA	S	O	1	7	7	On-going air quality monitoring. Planning applications commented on	Air quality monitoring has continued during this period. Planning applications responses within this time have considered AQ impacts Biodiversity projects implemented
11. Travelwise NI promoting more sustainable transport methods	2012 Travelwise NI 2022 DFI Active Travel Branch	Increased use of sustainable methods and therefore improving air quality	S	O	1	7	7	On going air quality monitoring and initiatives continued	Travelwise now superseded by new sustainable strategies within the DFI. Ongoing air quality monitoring continued.

5.2 Review to revoke AQMA at Normandy Court Dundonald

Levels of NO₂ have decreased within the AQMA and have been below the AQS objective since the completion of the Rapid Transport System in 2018. Due to the COVID 2020 results being included in this reduction, LCCC shall review the results to move towards revoking the AQMA if the results in 2023 remain below the objective as this will have shown a trend for more than 5 years.

Figure 13. Annual mean concentration of NO₂ at Normandy Court, Dundonald 2015 - 2022



Committee:	Environment & Sustainability
Date:	6 March 2024
Report from:	Acting Head of Waste Management & Operations

CONFIDENTIAL REPORT

Reason why the report is confidential:	Information relating to the financial or business affairs of any particular person (including the Council holding that information).
When will the report become available:	<i>10 years from contract commencement for non redacted report</i>
When will a redacted report become available:	<i>Post Contract Commencement</i>
The report will never become available:	

Item for:	Decision
Subject:	Arc21 Provision of Services for The Receipt, Storage and Transfer of Municipal Waste Tender

1.0	<p><u>Background and Key Issues</u></p> <p>A procurement was conducted by arc21 for the provision of services for the receipt, storage and transfer of municipal waste for use by Lisburn & Castlereagh City Council.</p> <p>The main elements of the service required included:</p> <ul style="list-style-type: none"> (i) the acceptance and storage of the Councils municipal waste, at a suitably consented facility which was to be located within a specific geographical area based on the centre of waste arisings, to ensure that the refuse vehicles point of delivery was within a reasonable travel distance; (ii) the bulking of the municipal waste and transfer of it to Cottonmount landfill site (provision also included to allow for a change location, should it be required over the contract period); and (iii) the collection and reporting of data. <p>Having identified the requirement for a new contract, tender action was initiated in accordance with the Public Contract Regulations 2015 using the Open Procedure on 15 December 2023 by the placing of a Tender Notice in Find Tenders UK. This was followed by adverts in two local papers and the arc21 website.</p> <p>The specification was performance based and required Tenderers to demonstrate, through a service delivery plan, how the requirements would be met.</p> <p>Key Contract elements included:</p> <ul style="list-style-type: none"> (i) Initial contract duration of 3 months with an option for extension of any period up to twelve months; (ii) Delivery point to be available Monday to Friday from 8am until 5pm and available on a Saturday (up to three times per quarter, without additional charge) from 8am to 3pm. Site to be available to receive waste on all Public holidays with the exception of 12 July and 25 December; (iii) Vehicle turnaround of 30 minutes or less required;
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- (iv) Payment mechanism based on tonnage and mileage rates with pricing reviews for fuel applicable if services are performed for more than 6 months and CPI, only applicable if the services are performed for more than twelve months;
- (v) Provision for additional waste stream to be added should the need arise;
- (vi) Provision included for a change to the point to which the municipal waste is to be transferred;
- (vii) Contingency arrangements to be available to receive and transfer the residual waste;
- (viii) Provision of weekly and quarterly information to include documentation to show tonnage accepted at the delivery point in addition to tonnage transferred to the disposal point; and
- (ix) Service credits applicable for specified aspects of non-performance

In response to the call for tender one response was received from Natural World Products Ltd.

The tender submission was evaluated in accordance with the criteria stated in the tender documentation and comprised of the following stages:

STEP 1

Completeness and Compliance which comprised of satisfying the following elements:

- Confirmation of acceptance of the Call for Tender and the Form of Contract;
- Confirmation that the proposed solution can deliver the essential elements of the service;
- Provision of a point of delivery within the specified geographical area;
- All Regulatory Consents being in place at the time of submission of the tender. Such evidence included complete copies of the following Specified Regulatory Consents:
 - Planning permissions
 - Current PPC Permits and Current Waste Management Licences;
 - Current working plans and
 - Current permissions pertinent to the haulage and transport of material associated with the service.
 - Letters of Support (excluding contingency providers);
 - Insurances (excluding contingency providers)

STEP 2 – worth 30%

Evaluation of the Service Delivery Plan which comprised the following four elements:

- Arrangements for the receipt of Contract Waste ;
- Arrangements for the loading, transfer and management of Contract Waste to a specified location;
- Performance Management and Reporting; and
- Communications and Complaint Handling

STEP 3 – worth 70%

Evaluation of cost which was mainly based on the costs associated with the Council vehicles travelling to the nominated delivery point and the cost for the tenderer to accept, store, load and transfer the material to Cottonmount.

The submission made by Natural World Products Ltd. was deemed to have passed step one and was then evaluated further based on steps two and three. Following completion of the full evaluation the tender submitted by Natural World Products Ltd. has been recommended for acceptance.

As there was only one bidder there is no requirement to run a standstill period.

In order to ensure service continuity a new contract needs to be in place for 1 April 2024. The March Environment and Sustainability Committee was therefore granted delegated authority to consider and approve recommendations relating to this procurement.

2.0

Recommendation

It is recommended that

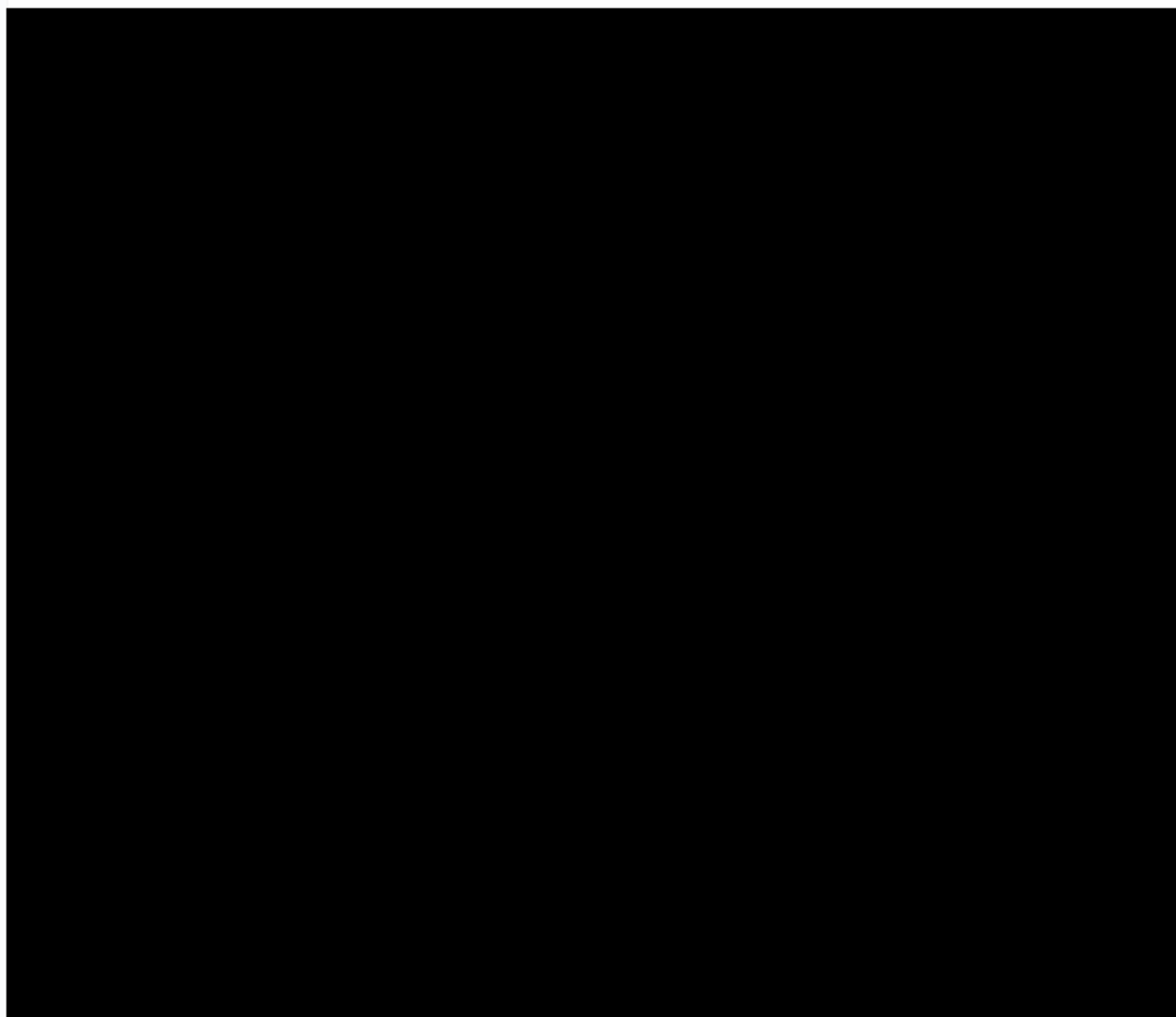
- (a) the contract for the provision of services for the receipt, storage and transfer of municipal waste for use by Lisburn & Castlereagh City Council be awarded to Natural World Products Ltd, 32 Glenside Road, Dunmurry for an initial period of 3 months, subject to the completion of arc21 governance and NWP satisfying the pre award conditions and
- (b) that following the award of the contract and subject to the services being performed satisfactorily the contract may be extended for a period of up to 12 months after the initial term as per operational need.

Furthermore, it is noted that in agreeing with the recommendation that the indexation mechanism included within the contract will be managed as detailed within the contract.

3.0

Finance and Resource Implications

Pricing information is provided below:



Based on the tendered rates adequate financial provision has been made in the 2024/25 revenue estimates for transfer provision.

	<p>It is also possible that a new waste stream might be included in the later stages of any contract extensions. If that is the case the provisions of the contract will be utilised to make the change and the financial impact will be reported to Council.</p>	
4.0	<p><u>Equality/Good Relations and Rural Needs Impact Assessments</u></p>	
4.1	<p>Has an equality and good relations screening been carried out?</p>	<p>No</p>
4.2	<p>Brief summary of the key issues identified and proposed mitigating actions <u>or</u> rationale why the screening was not carried out</p> <p>Contract procured through arc21 in line with all public procurement processes</p>	
4.3	<p>Has a Rural Needs Impact Assessment (RNIA) been completed?</p>	<p>No</p>
4.4	<p>Brief summary of the key issues identified and proposed mitigating actions <u>or</u> rationale why the screening was not carried out.</p> <p>Contract procured through arc21 in line with all public procurement processes</p>	

Appendices:	
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Committee:	Environment and Sustainability
Date:	6 March 2024
Report from:	Acting Director of Environmental Services

CONFIDENTIAL REPORT

Reason why the report is confidential:	Information relating to the financial or business affairs of any particular person (including the Council holding that information).
When will the report become available:	-
When will a redacted report become available:	Redacted report available following Council approval
The report will never become available:	-

Item for:	Decision
Subject:	Tender for the provision of a haulage service for residual and green wastes from Council Household Recycling Centres (Ref STA23/24-040)

1.0	<p><u>Background and Key Issues</u></p> <p>1. The service is for collection and transportation of residual and green wastes from Council Household Recycling Centres to specified delivery locations.</p> <p>2. Tender T22/23-052 for the haulage of residual and green wastes from Council Household Recycling Centres was advertised with a closing date of 25th August 2023 and an anticipated contract commencement date of 1st October 2023. However, due to [REDACTED] it was not possible to select a suitable bid from those received and the tender was abandoned. It was therefore necessary to extend the current contract with R&M Greenkeeper Ltd, Unit C1, Kilcronagh Business Park, Cookstown, Co Tyrone, BT80 9HG, for 6 months commencing 1 October 2023 to 31 March 2024, to enable a review of tender documents and further market engagement.</p> <p>3. To enable the preparation of final tender documents and mobilisation period, it is necessary to further extend the contract with R&M Greenkeeper Ltd for 6 months commencing 1 April 2024 to 30 September 2024. R&M Greenkeeper have agreed to maintain current contract rates for the 6 months period.</p> <p>4. The Single Tender Action approach was taken in consultation with the Council’s Procurement Section to ensure compliance with the Procurement Regulations. In line with the Accounting Manual and to ensure compliance with the Public Contracts Regulations, a STA report was prepared in consultation with the Procurement Section clearly setting out the reasons for the STA. During the process, and where applicable, the provisions of the European Procurement Regulations were taken into account.</p>
2.0	<p><u>Recommendation</u></p> <p>It is recommended that Members approve the award of the tender to R&M Greenkeeper Ltd for the period 1 April 2024 to 30 September 2024.</p>
3.0	<p><u>Finance and Resource Implications</u></p>

	Provision has been made within revenue estimates	
4.0	<u>Equality/Good Relations and Rural Needs Impact Assessments</u>	
4.1	Has an equality and good relations screening been carried out?	Yes
4.2	Brief summary of the key issues identified and proposed mitigating actions <u>or</u> rationale why the screening was not carried out It is considered that there will be no adverse effects from the provision of the service on any equality group.	
4.3	Has a Rural Needs Impact Assessment (RNIA) been completed?	No
4.4	Brief summary of the key issues identified and proposed mitigating actions <u>or</u> rationale why the screening was not carried out. This is not considered relevant to the service.	

Appendices:	None
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