



October 27th, 2023

**Chairperson:** Councillor C McCready

**Vice-Chairperson:** Councillor R Carlin

**Aldermen:** J Baird, M Gregg, S Skillen, J Tinsley

**Councillors:** S Burns, P Catney, G Hynds, P Kennedy, J Lavery BEM, A McIntyre, M McKeever, R McLernon, N Parker

**Ex Officio:**

The Right Worshipful the Mayor, Councillor A Gowan

Deputy Mayor, Councillor G McCleave

**Notice Of Meeting**

A meeting of the Environment and Sustainability Committee will be held on **Wednesday, 1st November 2023 at 6:00 pm** for the transaction of the undernoted Agenda.

For those Members attending this meeting remotely, the Zoom details are included in the Outlook invitation that has been issued.

Hot Buffet will be available in Lighters Restaurant from 5.15pm for Committee Members.

**David Burns**  
**Chief Executive**

# 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 Head of Service (Building Control and Sustainability)

### 3.1 Department of Finance Consultation on a Range of Technical Issues Relating to The Building Regulations NI

*For Decision*

📄 *Item 3.1 - DOF Consultation - Range of technical issues relating to Building Regs NI.pdf* *Page 1*

📄 *Item 3.1 - Appendix 1 BC - Part F etc Consultation.pdf* *Page 3*

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

### 4.1 Notice of Motion – Impact of Animal Welfare Budget Cuts by the Department of Agriculture, Environment and Rural Affairs (DAERA)

*For Decision*

📄 *Item 4.1- Notice of Motion - Animal Welfare Funding.pdf* *Page 51*

📄 *Item 4.1 - Appendix 1EH - Notice of Motion Animal Welfare Funding.pdf* *Page 53*

### 4.2 Notice of Motion - Clean Air

*For Decision*

📄 *Item 4.2- Notice of Motion - Clean Air.pdf* *Page 54*

📄 *Item 4.2 - Appendix 2EH NOM - Clean Air 2.pdf* *Page 56*

### 4.3 Christmas Eve Trading Hours for Large Retailers

*For Decision*

📄 *Item 4.3 - Report - Christmas Eve Trading.pdf* *Page 57*

### 4.4 Update on Dog Fouling Initiatives including DNA Testing to Support the Prevention of Dog Fouling

*For Decision*

📄 *Item 4.4 - Report - DNA Testing and Dog Fouling Initiatives.pdf*

*Page 59*

📄 *Item 4.4 - Appendix 3EH - DNA Testing for Dog Fouling.pdf*

*Page 61*

📄 *Item 4.4 - Appendix 4EH - Update on Dog Fouling Initiatives.pdf*

*Page 65*

## **5.0 Any Other Business**

|                     |   |
|---------------------|---|
| <b>Committee:</b>   | Environment & Sustainability                        |
| <b>Date:</b>        | 1 <sup>st</sup> November 2023                       |
| <b>Report from:</b> | Head of Service – Building Control & Sustainability |

|                  |  |
|------------------|--|
| <b>Item for:</b> | Decision   |
| <b>Subject:</b>  | Department of Finance Consultation on a range of technical issues relating to the Building Regulations NI. |

1.0

### **Background and Key Issues**

1. The purpose of this report is to bring to Elected Members, for approval, the draft response to the Department of Finance Consultation on a range of technical issues relating to the Building Regulations NI.
2. Members were informed at the October Environment & Sustainability Committee that a draft response would be prepared by Officers and be presented to the November Committee for approval.
3. October Full Council meeting granted delegated authority for this Environment & Sustainability Committee, held on 1<sup>st</sup> November 2023, powers to agree the draft consultation response for submission before the closing date of 15<sup>th</sup> November 2023.
4. Members were provided with a link to the documentation on the DoF website and asked that any comments they wished to make to come back through the Head of Service directly.  
  
<https://www.finance-ni.gov.uk/consultations/review-energy-efficiency-building-regulations>
5. The document includes pre-consultation detail outlining potential next steps on a range of inter-related areas, including:
  - conservation of fuel and power
  - ventilation
  - mitigation of overheating in dwellings; and
  - electric vehicle charging infrastructure to parking spaces at buildings.
6. The current 'discussion document' is more of a call for evidence in a pre-consultation format covering a wide range of subject areas. It is 273 pages (with additional Equality Impact and Rural Needs documents) and contains at least 125 questions. The nature of the evidence gathering is very wide and is not necessarily specific at this stage to a Regulatory function. It is expected that further more directed consultation will follow that will require more specific input from Council as a Regulatory body.
7. Members will find the draft response compiled by Officers on behalf of Council attached at **Appendix 1 BC**.

|     |  |                          |
|-----|--|--------------------------|
|     | <p>8. The draft response for approval, focuses on the council's direct Building Regulation enforcement function.</p>   |                          |
| 2.0 | <p><b><u>Recommendation</u></b></p> <p>It is recommended that Members agree to the submission of the attached response, on behalf of the Council in relation to, Department of Finance Consultation on a range of technical issues relating to the Building Regulations NI, subject to any further comment</p> |                          |
| 3.0 | <p><b><u>Finance and Resource Implications</u></b></p> <p>None at this stage</p>   |                          |
| 4.0 | <p><b><u>Equality/Good Relations and Rural Needs Impact Assessments</u></b></p>  |                          |
| 4.1 | <p>Has an equality and good relations screening been carried out?</p>  | <p>Yes <del>No</del></p> |
| 4.2 | <p>Brief summary of the key issues identified and proposed mitigating actions <b><u>or</u></b> rationale why the screening was not carried out</p> <p><b>This is a third party consultation and not an internal document.</b></p>  |                          |
| 4.3 | <p>Has a Rural Needs Impact Assessment (RNIA) been completed?</p>  | <p>Yes <del>No</del></p> |
| 4.4 | <p>Brief summary of the key issues identified and proposed mitigating actions <b><u>or</u></b> rationale why the screening was not carried out.</p> <p><b>This is a third party consultation and not an internal document.</b></p>   |                          |

|                           |  |
|---------------------------|--|
| <p><b>Appendices:</b></p> | <p>Appendix 1BC – Draft Council Response to DoF for Approval</p> |
|---------------------------|--|



## **Review of energy efficiency requirements and related areas of Building Regulations**

### **Consultation return form**

26 July 2023

(closing date for receipt of responses is 15 November 2023 at 23:59)

Review of energy efficiency requirements and related areas of Building Regulations –  
CONSULTATION RETURN FORM

## Contents

|  |                                     |
|--|-------------------------------------|
| <b>Section 0: Information and how to respond</b> .....   | <b>3</b>                            |
| <b>Section 1: Introduction and General Information</b> .....   | <b>7</b>                            |
| <b>Section 2: Background</b> .....   | <b>7</b>                            |
| Section 2A:    Background - legislative considerations and policy contexts.....  | 7                                   |
| Section 2B:    Background - (developments elsewhere).....  | 8                                   |
| <b>Section 3: Pre-consultation Phase 3 proposals for dwellings</b> .....   | <b>10</b>                           |
| Section 3A:    Part F (Conservation of fuel and power) proposals for new dwellings,<br>Phase 3.....  | 10                                  |
| Section 3B:    Part F (Conservation of fuel and power) work to existing dwellings,<br>Phase 3.....   | <b>Error! Bookmark not defined.</b> |
| Section 3C:    Part K (Ventilation) dwellings- Phase 3.....  | 22                                  |
| Section 3D:    Mitigating overheating risks in dwellings – Phase 3 .....   | 25                                  |
| Section 3E:    Electric Vehicle infrastructure- background and Phase 3 proposals for<br>dwellings .....  | 27                                  |
| <b>Section 4: Pre-consultation Phase 3 proposals for buildings other than<br/>                    dwellings</b> .....                            | <b>32</b>                           |
| Section 4A:    Part F (Conservation of fuel and power) proposals for new buildings<br>other than dwellings Phase 3.....                          | 32                                  |
| Section 4B:    Section 4B: Part F (Conservation of fuel and power) proposals for work<br>to existing buildings other than dwellings Phase 3..... | 34                                  |
| Section 4C:    Part K (Ventilation) buildings other than dwellings Phase .....   | 38                                  |
| Section 4D:    Electric vehicle infrastructure- Phase 3 proposals for buildings other<br>than dwellings.....                                     | 41                                  |
| <b>Section 5: Considerations for Phase 4 uplifts</b> .....   | <b>43</b>                           |
| <b>Section 6: Concurrent issues - headline summary</b> .....   | <b>45</b>                           |
| Section 6A:    National Calculation Methodology issues .....   | 45                                  |
| Section 6B:    Embodied Carbon .....   | 45                                  |
| Section 6C:    Over-sized new homes.....   | 47                                  |
| Section 6D:    Performance gap.....  | 48                                  |

## Section 0: Information and how to respond

### DISCUSSION PAPER PACKAGE – CONTENTS AND RESPONSE

- 0.1 This consultation has been issued by the Department of Finance, which has responsibility for maintaining the Building Regulations for Northern Ireland. This document, together with the other consultation documents, is available online at: <https://www.finance-ni.gov.uk/consultations>
- 0.2 The consultation documents are:
- Review of energy efficiency requirements and related areas of Building Regulations: Discussion Document and Pre-consultation on next steps
  - Draft Equality Screening document
  - Rural Needs Assessment

### Responding to this discussion paper

- 0.3 We look forward to receiving your comments and views concerning any of the proposals contained in this discussion paper. We ask you to exercise care and refrain from the inclusion of any potentially defamatory material as it is our intention to publish responses on the Department's website. We will not publish the names or contact details of respondents, but will include the names of organisations responding.
- 0.4 We would encourage you to respond to the discussion paper using the online facility on the Citizen Space platform at <https://consultations2.nidirect.gov.uk/dof/building-regulations-discussion-document-2023>, where you can answer the questions and enter any supporting comments. It is not compulsory to answer all of the questions, so you can take part in the survey even if you do not have views on all of the issues.
- 0.5 If you use the consultation hub - Citizen Space - to respond, you will receive a copy of your response via email. Otherwise, individual responses will not be acknowledged unless specifically requested.
- 0.6 Your opinions are valuable to us. Thank you for taking the time to read this document and respond.

### Next steps in the consultation process

- 0.7 Where respondents have given permission for their response to be made public, and after we have checked that they do not contain personal



Review of energy efficiency requirements and related areas of Building Regulations –  
CONSULTATION RETURN FORM

information or product names, responses will be made available to the public at <https://www.finance-ni.gov.uk/publications>. We may also make responses to this consultation available to the Northern Ireland Assembly and for public inspection at the Building Standards Branch office.

- 0.8 Following the closing date, all responses will be analysed, and the Department will publish a summary of responses to the consultation.
- 0.9 All information will be handled in accordance with the General Data Protection Regulations.

### **Confidentiality and data management**

- 0.10 If you ask for your response to be regarded as confidential and not to be published, you will be asked to explain to us why you regard the information you have provided to be confidential.
- 0.11 Information provided in response to this discussion paper, including personal data will be published or disclosed in accordance with the access to information regimes (These are primarily the Freedom of Information Act 2000 (FOIA), the Data Protection Act 2018 (DPA), the UK General Data Protection Regulation, and the Environmental Information Regulations 2004. If we receive a request for disclosure of confidential information, we will take full account of your explanation, but we cannot give an assurance that confidentiality can be maintained in all circumstances.
- 0.12 The Department of Finance will process your personal data in accordance with the law and in the majority of circumstances this will mean that your personal data will not be disclosed to third parties.
- 0.13 Are you satisfied that this consultation has followed the Consultation Principles? If not or you have any other observations about how we can improve the process please contact us at [info.bru@finance-ni.gov.uk](mailto:info.bru@finance-ni.gov.uk) or write to the following address:  
Building Standards Branch  
Department of Finance  
6th Floor Goodwood House  
44-58 May Street  
Belfast  
BT1 4NN

### **Territorial extent:**

- 0.14 This call for evidence consultation applies solely to Northern Ireland.

Review of energy efficiency requirements and related areas of Building Regulations –  
CONSULTATION RETURN FORM

## Completion of the Response Form

The Department will consider all responses to this consultation received on or before the closing date for receipt of responses which is **15 November 2023**.

***Submissions made after this date will not be considered.***

**We would strongly encourage you to respond to the consultation by completing the survey on the Citizen Space platform, which can be accessed [here](#).**

If using this form to respond to the consultation please send it by email to:

[info.bru@finance-ni.gov.uk](mailto:info.bru@finance-ni.gov.uk) or it may be posted to:

Consultation Co-ordinator  
Department of Finance  
Building Standards Branch  
Floor 6,  
Goodwood House  
44-58 May Street  
BELFAST  
BT1 4NN

Please refer to the package of Consultation Documents which outline fully the proposed amendments at –

<https://www.finance-ni.gov.uk/consultations/review-energy-efficiency-building-regulations>

Click on the box (or insert an “x”) beside “Yes”, “No” or “No view” as appropriate. It is not essential to give an answer to every question.

Please make any comments you might have in the box provided. If you disagree with any of the proposals the Department would be interested to know why you disagree.

Review of energy efficiency requirements and related areas of Building Regulations –  
CONSULTATION RETURN FORM

**Respondent Details**

In order for your response to be considered valid, you must provide the following information:

|                              |                                      |
|------------------------------|--------------------------------------|
| <b>Name</b>                  | Colin Duff                           |
| <b>Organisation (if any)</b> | Lisburn and Castlereagh City Council |
| <b>Email</b>                 | Colin.duff@lisburncastlereagh.gov.uk |

Are you responding as an individual?

Or are you representing the views of an organisation?

Please indicate how you wish your response to be handled and, in particular, whether you are content for your response to be published.

If you ask for your response to be confidential, we will still take account of your views in our analysis but we will not publish your response, quote anything that you have said or list your name. If you ask for your response to be regarded as confidential and not to be published, you will be asked to explain to us why you regard the information you have provided as confidential.

To find out how we handle your personal data, please see your privacy policy ([Department of Finance Privacy Notice | Department of Finance \(finance-ni.gov.uk\)](#) ). When submitting this response you agree to our privacy policy.

The Department of Finance would like your permission to publish your consultation response. Please indicate if you wish your response to be treated as confidential.

Yes No

If you wish your response to be treated as confidential, please provide your justification for doing so.

We may wish to contact you again in the future, but we require your permission to do so. Are you content for the Department of Finance to contact you again in relation to this consultation exercise?

Yes  No

## Section 1: Introduction and General Information

No questions

## Section 2: Background

---

### Section 2A: Background - legislative considerations and policy contexts

---

**Q.2A.1 Do you agree that coming into force considerations would be best addressed through review of Article 19 of the Order, rather than by transitional provisions of any amendment to Part F?**

**Yes**

Comments (if any):

The comment of yes is provisional without the details of any future proposals to review the Order

---

**Q.2A.2 Do the current arrangements here, with up to three year phasing in period, support an argument for a more ambitious uplift, as it provides scope for processes to be developed and training to take place?**

**Yes**

Comments (if any):

Ambitious targets clearly mean there is/will be a need for training across the industry, including local Council Building Control.

The industry needs to find a method of training the small medium enterprises which make up so much of the local construction industry. This should not be left to the enforcement body (Local Council Building Control) to carry out at the point of construction.

---

**Q.2A.3 What do you consider should be the maximum time permissible for previously approved applications to commence on site after the introduction of the new standards?**

Comments (if any):

The current 3 years is satisfactory given that most building regulation application works are commenced within this period. To reduce to less would have implications on staffing levels and workloads within Building Control Services and also within the construction industry due to requirement for a new application for the works.

---

**Q.2A.4 Do you have a view on any specific regulations or definitions which would benefit from reform, with a view to simplifying or clarifying Part F regulations<sup>1</sup>? If so, please provide details.**

Comments (if any):

Nothing specific at this time.

---

## **Section 2B: Background - (developments elsewhere)**

---

**Q.2B.1 Have you modelling information directly comparing the compliant or 'notional' buildings across administrations, ideally using an up to date and consistent methodology for comparative analysis purposes (e.g. SAP 10)? If so, please provide a link or information on how to access this.**

**No**

Comments (if any):

No we do not hold any modelling information in relation to this.

---

**Q.2B.2 Are there any additional local characteristics or issues around our local industry that the Department should be mindful of as we take forward proposals?**

Comments (if any):

Department to ensure that the construction/ M&E industry is equipped to deliver any new technologies that may be included in any future requirements.

The dispersion of rural dwellings in NI (a high proportion of rural dwellings) would appear to be an issue in relation to the provision of any 'mains' type of energy supply. Consideration should be given to the increased costs to existing dwelling if the regulations lead to rising traditional fuel costs.

---

<sup>1</sup> [The Building Regulations \(Northern Ireland\) 2012 \(legislation.gov.uk\)](http://legislation.gov.uk)

Review of energy efficiency requirements and related areas of Building Regulations –  
CONSULTATION RETURN FORM

11

---

**Q.2B.3 Do you agree with the proposed timing of uplifts planned for 2023/24 (Phase 3) and 2026/27 (Phase 4), which are intended to follow developments in England by 18-24 months in each case?**

**Yes**

Comments (if any):

While this Council would be supportive of the expedient introduction of higher standards and the associated reduction in carbon production, it also realises that such changes have major affects across the construction and associated industries.

Consultation is required with industry to see if the skills and technology is readily available.

### Section 3: Pre-consultation Phase 3 proposals for dwellings

---

**Q.3.1 The Department's programme of proposals seeks to implement a 'Phase 3' uplift here in 2023 (likely now to be in 2024) to reflect the changes above. Do you agree that this is appropriate that this should cover the extent of issues above?**

**Yes**

Comments (if any):

---

### Section 3A: Part F (Conservation of fuel and power) proposals for new dwellings, Phase 3

---

**Q.3A.1 Do you agree that a new primary energy metric and TPER targets should be introduced?**

**Yes**

Comments (if any):

As a Regulatory enforcement body, we do not have any comment to make on this at present. We would need further detail to explore implications on the enforcement of the Building Regulations.

---

**Q.3A.2 Are you content that a FEES metric and targets should be introduced in line with the assessment in England?**

**Yes**

Comments (if any):

Yes, but we also would support the approach taken in ROI and Scotland in regards to an alternative whole building approach.

Review of energy efficiency requirements and related areas of Building Regulations –  
CONSULTATION RETURN FORM

13

---

**Q.3A.3 Could you provide a specification that house builders are actually adopting in practice in order to be compliant with England's current requirements? Please provide details and commentary or explanation.**

**No**

Comments (if any):

---

**Q.3A.4 Do you think the proposed Notional Dwelling fabric is suitable for Option 1 and Option 2's proposals?**

**Yes**

Comments (if any):

Based on other jurisdictions evidence

---

**Q.3A.5 Would you agree with replication of England's limiting U-values? We would be grateful for any evidence or reasoning if you think these should remain in line with the Republic of Ireland or be otherwise different.**

**Yes**

Comments (if any):

We do not hold any evidence to comment on this issue

---

**Q.3A.6 Do you agree that the Department should not introduce a cost (SAP rating) metric assessment?**

**Yes**

Comments (if any):

Agree that this should not be introduced as the cost assessment is based on a neutral UK location which would mean that the outputs would not be accurate.



Review of energy efficiency requirements and related areas of Building Regulations –  
CONSULTATION RETURN FORM

14

---

**Q.3A.7 Do you agree that a delivered energy or energy use intensity metric is not needed as part of the Phase 3 uplift?**

**No**

Comments (if any):

This metric would be valuable in future in relation to the needs of the building, rather than the efficiency of the fitted systems.

---

**Q.3A.8 Do you agree that a renewable energy ratio assessment is not needed as part of the Phase 3 uplift?**

**No**

Comments (if any):

---

**Q.3A.9 Have you any comment to make on the metrics the Department is proposing to adopt for Phase 3?**

**No**

Comments (if any):

---

**Q.3A.10 Have you any opinion or evidence to support limiting the extent of variance for any individual dwelling when using a whole-block average performance to demonstrate compliance with TER, TPER or TFEE assessments?**

**No**

Comments (if any):

---

**Q.3A.11 Do you agree that the changes to the airtightness testing regime should include the measures introduced in England, but provide for a lower maximum permissible air permeability level than 8.0 m<sup>3</sup>/(h.m<sup>2</sup>) @ 50 Pa? If so, what should the maximum permissible level be?**

**Yes**

Comments (if any):

---

**Q.3A.12 Do you agree that all current fuel factors in TBF1 should be removed, so that targets (TER) are no longer relaxed where higher carbon fuels are used?**

**Yes**

Comments (if any):

However, it is felt that this decision cannot be properly determined until a more complete Rural Needs Impact Assessment is completed, due to the lack of gas network to rural areas. In the absence of a complete Rural Needs Impact Assessment the retention of emission fuel factors for areas with no access to the gas grid in the next uplift may be better. .

---

**Q.3A.13 Are you content with the likely outcomes for biofuels under Option 1 and the proposed Primary Energy metric? If not, how should the regime be less, or more, permissive towards biofuels?**

**Yes**

Comments (if any):

Depending on how biofuel is derived.

Review of energy efficiency requirements and related areas of Building Regulations –  
CONSULTATION RETURN FORM

16

---

**Q.3A.14 Have you any evidence or concern around the extent of renewable generating technology expected under either Option 1 or 2?****Yes**

Comments (if any):

Other than to ensure that Industry has the expertise and technology to satisfy any new requirement.

We would have concern as to the difficulties provided in establishing the status of the export connection when assessing Building Control applications, as we have limited access to the relevant information, and also the possible scope to mislead in terms of the actual status when built.

---

**Q.3A.15 Have you any comment on the proposed revised treatment of non-export connections?****No**

Comments (if any):

---

**Q.3A.16 Do you agree that new heating systems should be designed and installed to operate with a maximum flow temperature of 55°C as per England's current guidance? If not please provide evidence to support a different maximum flow temperature, or position.****Yes**

Comments (if any):

Yes, this is a sensible approach to future proof for any future retrofit to low carbon heating which operates more efficiently at lower flow temperatures.

---

**Q.3A.17 Do you agree that replication of Sections 5 and 6 of England's Approved Document on building services and controls guidance into the next version of TBF1 would be appropriate for the Phase 3 proposals?**

**Yes**

Comments (if any):

Yes it would be better to replicate Sections 5 and 6 of England's approved document as this would give a fixed point of what is required for building regulations approval.

---

**Q.3A.18 Do you have any comments or issues around how UK and EU Ecodesign requirements might interact with Part F guidance requirements at Phase 3 or over the longer term?**

Comments (if any):

No Comment

---

**Q.3A.19 Do you agree that designers, should be able to demonstrate a water efficiency assessment as per Appendix A of England's Approved Document G?**

**Yes**

Comments (if any):

---

**Q.3A.20 Have you any suggestion or further insight on how heat networks should be assessed under the Phase 3 proposals? If so, please outline the issue and suggested handling in your response.**

**No**

Comments (if any):

Review of energy efficiency requirements and related areas of Building Regulations –  
CONSULTATION RETURN FORM

18

---

**Q.3A.21 Is the specification of the heat pump proposed for Option 2 appropriate? If not, how should it be amended?****Yes**

Comments (if any):

Experts in the field should be consulted

---

**Q.3A.22 Do you have concerns or evidence on the viability and risks associated with either Option 1 or Option 2?****Yes**

Comments (if any):

The availability of supply and expertise in heat pump design and installation. Industry should be consulted.

---

**Q.3A.23 Should the Department implement Option 1 or Option 2 for the Phase 3 uplift?**Option 1       Option 2       Other 

Comments (if any):

This requires specific consultation with industry

---

**Q.3A.24 Have you any comment on how the Option 2 specification should be improved, for Phase 3 or Phase 4 or 5?**

Comments (if any):

No Comments

---

**Q.3A.25 Do you agree that the Department should adopt the new BREL type format for notice of compliance with emissions, renewables and other requirements in keeping with England’s provisions? See Appendix B of Approved Document L1 (2021) for further detail<sup>2</sup>**

**Yes**

Comments (if any):

Agree

---

**Q.3A.26 Do you agree that the Department’s guidance should additionally require provision of a new non-technical Home User Guide in keeping with England’s provisions? for further detail see**

<https://www.gov.uk/government/publications/home-user-guide-template>

**Yes**

Comments (if any):

The timings of Completion, and handover may need to change to allow this to happen in a meaningful way, and for this to be evidenced to Building Control.

---

**Q.3A.27 Do you agree that the Department should require geo-located photographs to be lodged to support evidence of the as-built construction?**

Yes  No

Comments (if any):

In Principle it is a good idea to improve the quality of the work on site, however, we would have concerns around this proposal. Will there be the training and awareness in place within the construction industry, will there be systems in place to deliver and store this information? This information regarding accredited details is normally received by Building Control on completion of the works, if not in compliance at this stage a lot of disruptive work will need to be carried out to a completed house. Receiving evidence as works progress will require additional resources from the enforcing authority to check and store the information. We would have concerns over the quality that could rightly or wrongly result in enforcement.

Consideration should be given to an accreditation scheme.

---

<sup>2</sup> [Conservation of fuel and power: Approved Document L - GOV.UK \(www.gov.uk\)](#)

Review of energy efficiency requirements and related areas of Building Regulations –  
CONSULTATION RETURN FORM

20

**Section 3B: Part F (conversion of fuel and power) work to existing dwellings,  
Phase 3.**

---

**Q 3B.1 Do you support the addition of a Primary Energy and FEES metric assessment alongside the current Carbon emissions metric assessment when using the Equivalent Target Approach to demonstrate compliance in cases of work to existing dwellings?**

**Yes**

Comments (if any):

---

**Q 3B.2 Do you have any particular concerns or insight on the U-values used in standards related to existing dwellings for any of the various situations in other administrations?**

**No**

Comments (if any):

---

**Q.3B.3 Do you agree that our U-value standards should be largely in line with the proposed standards for new building elements in cases of extensions and replacement elements?**

**Yes**

Comments (if any):

Review of energy efficiency requirements and related areas of Building Regulations –  
CONSULTATION RETURN FORM

21

---

**Q.3B.4 Do you agree that our U-value standards should be largely in line with the values used in England, in cases of a material change of use of a building, for renovated elements and where a change of energy status occurs?**

**Yes**

Comments (if any):

---

**Q.3B.5 Are there any particular areas where alternative performance values for fabric elements (such as EWI) should be considered? If so please provide evidence and an indication of the value you consider appropriate.**

**No**

Comments (if any):

No evidence held

---

**Q.3B.6 Do you agree that a maximum glazing area assessment should continue to form part of the requirements, where a material change of use to form a dwelling occurs?**

**Yes**

Comments (if any):



---

**Q.3B.7 Do you agree that traditional construction should be referenced out to third party guidance, with a greater scope for bespoke consideration in these situations?**

**Yes**

Comments (if any):

---

**Q.3B.8 Do you agree that the Boiler Plus measures introduced in England in 2018 and thermostatic control measures introduced in 2022 should be replicated and included in revised guidance here?**

**Yes**

Comments (if any):

---

**Q.3B.9 Do you agree that where a new or complete replacement heating system is being installed in an existing dwelling, it should be installed to operate with a maximum flow temperature of 55°C?**

**Yes**

Comments (if any):

Yes as this will future proof the building.

---

**Q.3B.10 Do you agree that both an emissions and primary energy performance assessment should be applied to boiler replacements where a change of fuels is proposed?**

**Yes** Comments (if any):

Yes agree it should be applied but the fees received for such applications do not reflect the additional checks that may be required.

Review of energy efficiency requirements and related areas of Building Regulations –  
CONSULTATION RETURN FORM

23

---

**Q.3B.11 Do you have information or evidence to help assure the Department that reversion from liquid biofuels to conventional home heating oil need not be a concern?**

**No**

Comments (if any):

---

**Q.3B.12 Do you agree that Technical Booklet F1 should be amended to follow the minimum services provisions of Section 5 and 6 of England's Approved Document L1, subject to further NIBRAC and public consultations? Please include any 'lessons learned' from the roll-out of these provisions elsewhere which may merit consideration.**

**Yes**

Comments (if any):

Yes but subject to further public consultation as noted.

---

**Q.3B.13 Do you agree that the consequential improvements similar to those applicable to extensions to dwellings in Wales should apply here?**

**Yes**

Comments (if any):

---

**Q.3B.14 Do you have any evidence or insight on the major renovation measures in place in the Republic of Ireland to suggest the Department should prioritise a similar approach here? If so, please include the evidence with your response.**

**No**

Comments (if any):

No evidence available

---

**Section 3C: Part K (Ventilation) dwellings- Phase 3**

---

**Q.3C.1 Do you agree that Technical Booklet K (TBK) should be split into two (similar to current Part F guidance) and that relevant guidance currently cited within the Ventilation Compliance Guides should be integrated within them?**

**Yes**

Comments (if any):

---

**Q.3c.2 Do you agree that Technical Booklet K guidance should cite background ventilator sizes in line with England and Wales?**

**Yes**

Comments (if any):

---

**Q.3C.3 Do you agree that revised TBK guidance should align the three principal systems (natural, continuous mechanical extract and continuous supply and extract/MVHR) in keeping with air-permeability thresholds England and Wales?**

**Yes**

Comments (if any):

Review of energy efficiency requirements and related areas of Building Regulations –  
CONSULTATION RETURN FORM

25

---

**Q.3C.4 Do you have any evidence or guidance that should prompt the Department to develop an independent approach to noise of mechanical ventilation systems in dwellings?**

**No**

Comments (if any):

---

**Q.3C.5 Do you agree that the updated performance based specification in England's ADF1 (Ventilation – dwellings) should be replicated in equivalent guidance here?**

**Yes**

Comments (if any):

---

**Q.3C.6 Do you support amendment of the Technical Booklet K guidance in line with the developments in England and Wales, to address ventilation alongside fabric retrofit work?**

Yes  No

Comments (if any):

We would require further evidence to support this as works carried out prior to any regulations changes could have an adverse impact on future design.

Review of energy efficiency requirements and related areas of Building Regulations –  
CONSULTATION RETURN FORM

26

---

**Q.3C.7 Have you any comment or insight on how the Department or others should support skills or cite competence standards for the design, testing and commissioning of ventilation systems in dwellings? Please include relevant details in your response.**

**No**

Comments (if any):

---

**Q.3C.8 Have you any other evidence on issues or suggestions on ventilation standards in dwellings, which the Department should consider as part of the review of Part K (Ventilation)?**

**No**

Comments (if any):

---

**Q.3C.9 Do you agree that CO<sub>2</sub> monitoring in dwellings should be a consideration for Phase 4?**

**Yes**

Comments (if any):

Should only be considered if there is evidence to supports its use.

---

**Q.3C.10 Do you support inclusion of ventilation guidance to more specifically consider clothes drying, in line with current provisions in Scotland?**

**Yes**

Comments (if any):

Would support the guidance on ventilation to drying spaces if they are included in the design of the dwelling.

---

**Q.3C.11 Do you have any evidence or insight on other aspects of ventilation for dwellings which the Department should take into account?**

**No**

Comments (if any):

---

**Section 3D: Mitigating overheating risks in dwellings – Phase 3**

---

**Q.3D.1 Do you agree that local regulation and guidance will be needed to mitigate overheating in new dwellings and residential buildings?**

**Yes**

Comments (if any):

---

**Q.3D.2 Do you agree with the proposed course of action whereby DSM modelling to TM59 requirements would be used in more complex situations but a simplified approach, largely following Scotland’s proposals, could be applied in more straightforward situations?**

**Yes**

Comments (if any):

---

**Q.3D.3 Should the new requirements only apply to new-build situations (i.e. to the erection of a building) or should it also apply to material change of use situations and/or extensions and structural alterations?**

**No**

Comments (if any):

Should be considered along with any associated requirements such as planning.

Review of energy efficiency requirements and related areas of Building Regulations –  
CONSULTATION RETURN FORM

28

---

**Q.3D.4 Should the noise assessment levels be based on planning issues, or should bespoke noise assessment and testing be expected where openings are proposed for purge cooling of rooms in dwellings or similar buildings?**

Option 1       Option 2

Comments (if any):

Unsure, we would need additional rational to respond to this

---

**Q.3d.5 Are you content that the guidance in Appendix D of the current Technical Booklet K provides sufficient clarity on pollution assessment where natural purge ventilation for cooling is proposed?**

Based on planning issues       Bespoke

Comments (if any):

Unsure, we would need additional rational to respond to this

---

**Q.3D.6 Do you agree that guidance should be revised to support a 1.1m high guarding at openings for purge cooling or should the current 800mm height for guarding at windows remain?**

**No**

Comments (if any):

Unless there is evidence that there is a risk with current height for guarding in domestic dwelling it should remain the same at 800mm. Further consideration should be given to high rise building

---

**Q.3D.7 Are there any other issues which should be taken into consideration in terms of the usability of openings for purge cooling?**

Comments (if any):

No comment

---

**Q.3D.8 Have you any evidence or modelling to indicate if a requirement for cooling could result in new Carbon emissions or Primary Energy targets proposed in Section 3A (see Table 3A.1) being difficult, or impossible, to deliver in practice in some circumstances e.g. single aspect flats next to noisy/polluted roads? If so, please provide details and outputs.**

Comments (if any):

No evidence held

---

**Q.3D.9 Can you evidence any 'lessons learned' from roll out of the overheating mitigation policies elsewhere that we should consider?**

Comments (if any):

No evidence held

---

### **Section 3E: Electric Vehicle infrastructure- background and Phase 3 proposals for dwellings**

---

**Q.3E.1 Do you agree with the proposed approach to use Building Regulations to legislate for EV infrastructure requirements?**

**Yes**

Comments (if any):

It is felt that the assessment of the number of charging points and relevant infrastructure required should be considered earlier in the design stage of the works and number of Parking Spaces required. This is something that is reviewed as part of the planning process it may be a better fit within that legislation.

Another issue that may arise and make it difficult for Building Control to assess is that larger housing developments whilst planning normally assess the full scheme when submitted, Building Control regularly get these in smaller phased works and cannot assess the overall complete picture.



Review of energy efficiency requirements and related areas of Building Regulations –  
CONSULTATION RETURN FORM

30

---

**Q.3E.2 Do you agree with the proposed approach to follow the technical provisions in England? The Department would be grateful for any comment on the guidance or out-workings there or in other regions.**

**Yes**

Comments (if any):

Looking at the examples it is probably reasonable but it is felt that this should be considered earlier in the design stage as outlined above.

---

**Q.3E.3 Do you agree that for new dwellings with associated parking spaces; one CP per dwelling or one per associated parking space (whichever is the lesser) should be required and that, in addition, for those buildings with more than ten associated parking spaces, ducting to the rest of the residential parking spaces to facilitate future installations, should also be required?**

**Yes**

Comments (if any):

As above

---

**Q.3E.4 Do you agree with the proposed limitations 1 and 2 (as outlined in paragraph 3E.34 and 3E.35) restricting the application of the requirements for EV infrastructure at parking spaces associated with new dwellings?**

**Yes**

Comments (if any):

As above

---

**Q.3E.5 Do you think there should be a limitation to the application of the requirements, on the grounds of additional grid connection costs that may accrue to developers as a result of the provision of CPs?**

Yes No

Comments (if any):

No view

---

**Q.3E.6 If the answer to Q 3E.5 is yes, do you think the amount of £3600 (which is currently under review) is appropriate and do you have any comment on how it should be assessed?**

Yes No

Comments (if any):

As enforcers we do not have a view or any evidence as to what would be a reasonable charge

---

**Q.3E.7 Do you agree that where a major renovation results in a residential building being associated with more than 10 parking spaces, then CPs should be provided at a rate of one per dwelling<sup>3</sup>, or one per associated parking space (whichever is the lesser) and that that ducting should be installed in each associated car parking space, to support the future installation of an EV CP?**

**Yes**

Comments (if any):

Currently if buildings are undergoing major renovation as per the definition Building Control would not normally be made aware of parking spaces and therefor it may be hard to determine this. For this reason it may be better to follow the approach of Rol and get ductwork provided to all in-curtilage spaces.

---

<sup>3</sup> this would apply to the existing dwellings- newly created dwellings would be addressed through the other routes (“new dwellings” or “a newly created dwelling by way of a material change of use”).

---

**Q3E.8 Do you agree with the proposed limitations to requirements in the case of major renovations, as outlined in paragraph 3E.41-3E.47?****Yes**

Comments (if any):

Limitation 3 – work to carpark may be done outside scope of work to building so building control may not be aware of it

Limitation 4 – how would Building Control assess the capacity of an existing electrical supply

Limitation 5 – Building Control is not in a position to determine if the installation would exceed 7% costs of renovations

---

**Q.3E.9 Do you agree that where a dwelling is created through a material change of use, a CP should be required at any parking space associated with the new dwelling?****Yes**

Comments (if any):

---

**Q.3E.10 Do you agree with the proposed limitations to the application of the requirement, where a newly created dwelling is established under a material change of use, as outlined in paragraph 3E.51-3E.55?****Yes**

Comments (if any):

Limitation 2 – work to carpark may be done outside scope of work to building so building control may not be aware of it

Limitation 3 – how would Building Control assess the capacity of an existing electrical supply

---

**Q.3E.11 Should a cost cap apply, instead of limiting the number of CPs on the basis of the existing supply, where a new electrical supply connection to the building occurs alongside a major renovation, or a material change of use that creates a new dwelling?**

**Yes**

Comments (if any):

How would the costs be assessed?

---

**Q.3E.12 Should there be a requirement for cable routes to all spaces associated with dwellings newly created by way of a material change of use, in circumstances where a building has more than 10 parking spaces?**

**Yes**

Comments (if any):

As before the assessment of parking provided should be dealt with earlier in the design stage so would be better considered then see previous comments

---

**Q.3E.13 Do you have any other views that you wish to provide on the EV section of the consultation (e.g. the minimum standard of EV charge point or safety and accessibility within the built environment)?**

**No**

Comments (if any):

No further comment

### Section 4: Pre-consultation Phase 3 proposals for buildings other than dwellings

---

#### Section 4A: Part F (Conservation of fuel and power) proposals for new buildings other than dwellings Phase 3

---

**Q.4A.1 Do you agree that the Department should adopt the same Primary energy metric for new non-domestic building assessments, as proposed for domestic buildings?**

**Yes**

Comments (if any):

---

**Q.4A.2 Do you agree that the Department should develop proposals to adopt the Notional Building specification in line with England’s Part L 2022 specification and requirements? If not, please provide evidence of why and how the specification should be altered.**

**Yes**

Comments (if any):

---

**Q.4A.3 Do you agree that the Department should develop proposals to adopt the limiting fabric U-values in line with England’s Part L 2022 requirements? If not, please provide evidence of how the specification is impractical here and what alternative standard should be required.**

**Yes**

Comments (if any):

Review of energy efficiency requirements and related areas of Building Regulations –  
CONSULTATION RETURN FORM

35

---

**Q.4A.4 Do you agree that the Department should develop proposals to adopt maximum permissible air-permeability values for new builds of 5.0 m<sup>3</sup>/(h.m<sup>2</sup>) @50Pa, or should it maintain consistency with England's approach?**

Maximum of 5.0 m<sup>3</sup>/(h.m<sup>2</sup>) @50Pa  **Maintain consistency with England.**

Comments (if any):

---

**Q.4A.5 Do you agree that the Department should develop proposals to adopt the limiting services standards in line with the requirements in England, Wales and Scotland?**

**If not, please provide evidence of how the specification is impractical here and what alternative standard should be required.**

**Yes**

Comments (if any):

---

**Q.4A.6 Do you agree that the Department should develop proposals to include the limiting services standards within the Technical Booklet guidance documents, or is a more explanatory, separate Non-domestic Building Services Compliance Guide preferable? Please provide reasoning in your response.**

**YES, services guidance should be within the Technical Booklet**

**NO, a separate NDBSCG is preferable**

Comments (if any):

---

**Q.4A.7 Do you agree that the Department should develop proposals to require BACS in new buildings?**

**If so, should the threshold be at 290kW or 180kW? Please provide evidence or reasoning for your view.**

Yes  No

Comments (if any):

No evidence available

---

**Q.4A.8 What is your view on the value of requiring either TM54 modelling of actual energy use in buildings >1000m<sup>2</sup> (as applicable in England) or Scotland's conversion to Zero Direct Emissions Heating reports?**

YES – at 290kW  YES – at 180kW

This would be an addition a measure that put extra burden on Building Control staff to assess and not sure how relevant it is if can be done on software not approved by government.

---

**Section 4B: Section 4B: Part F (Conservation of fuel and power) proposals for work to existing buildings other than dwellings Phase 3**

---

**Q.4B.1 Do you support the addition of a Primary Energy metric assessment alongside the current Carbon emissions metric assessment when using the Equivalent Target Approach to demonstrate compliance in cases of work to existing buildings?**

**Yes**

Comments (if any):

Review of energy efficiency requirements and related areas of Building Regulations –  
CONSULTATION RETURN FORM

37

---

**Q.4B.2 Do you have any particular comment, concern or insight on the U-values used for standards related to existing buildings in any of the various situations in other administrations?**

**No**

Comments (if any):

No comment

---

**Q.4B.3 Do you agree that our U-value standards should be largely in line with limiting standards for new buildings in cases of extensions and replacement elements on buildings other than dwellings?**

**Yes**

Comments (if any):

---

**Q.4B.4 Do you agree that our U-value standards should be largely in line with the values used in England, in cases of a material change of use of a building, for renovated elements and where a change of energy status occurs involving buildings other than dwellings?**

**Yes**

Comments (if any):



Review of energy efficiency requirements and related areas of Building Regulations –  
CONSULTATION RETURN FORM

38

---

**Q.4B.5 Are there any particular areas where alternative performance values for renovated elements or services should be considered for buildings other than dwellings? If so please provide evidence and an indication of the value you consider appropriate.**

**No**

Comments (if any):

---

**Q.4B.6 Do you agree that a maximum glazing area assessment should continue to form part of the requirements for extensions and be included where a material change of use occurs to buildings other than dwellings?**

**Yes**

Comments (if any):

---

**Q.4B.7 Do you agree that traditional construction should be referenced out to third party guidance, with a greater scope for bespoke consideration in situations applicable to traditionally constructed buildings other than dwellings?**

**Yes**

Comments (if any):

Clarity required on definition of 3<sup>rd</sup> party

Review of energy efficiency requirements and related areas of Building Regulations –  
CONSULTATION RETURN FORM

39

---

**Q.4B.8 Do you agree that where a new or complete replacement heating system is being installed in an existing building, it should be installed to operate with a maximum flow temperature of 55°C?**

**Yes**

Comments (if any):

---

**Q.4B.9 Do you agree that Technical Booklet F2 should be amended to follow the minimum services provisions of Section 5 and 6 of England's Approved Document L2, subject to further NIBRAC and public consultations? The Department would be grateful to understand any 'lessons learned' from the roll-out of these provisions elsewhere.**

**Yes**

Comments (if any):

Subject to further specific consultation

---

**Q.4B.10 Do you have any evidence on the success or otherwise of consequential improvements? If so, please include this with your response.**

**No**

Comments (if any):

---

**Q.4B.11 Do you think consequential improvement requirements should be—**

- a. retained (i.e. maintained in keeping with England),**
- b. amended (for example to apply where the principal works are of a particular value, rather than being based on the total floor area of the existing building),**
- c. extended to apply to all extensions, or otherwise extended; or**
- d. revoked?**

**Please provide a reasoning for your response and evidence that supports any changes you would propose.**

a       b       c       d

Comments (if any):

|   |
|---|
| A |
|---|

---

**Q.4B.12 Do you have any evidence or insight on the major renovations measures in place in the Republic of Ireland to suggest the Department should prioritise a similar approach here for buildings other than dwellings? If so please include the evidence with your response.**

**No**

Comments (if any):

|  |
|--|
|  |
|--|

---

### **Section 4C:      Part K (Ventilation) buildings other than dwellings Phase**

---

**Q.4C.1 Do you agree that Technical Booklet K should take a similar approach to noise and installation of ventilation systems, as England and Wales?**

**Yes**

Comments (if any):

|  |
|--|
|  |
|--|

---

**Q.4C.2 Do you agree that Technical Booklet K should replicate the proposed performance based guidance outlined for dwellings?**

**Yes**

Comments (if any):

---

**Q.4C.3 Do you agree that Technical Booklet K (TBK) should bring the Appendix D guidance on polluted external air into the main body text of TBK?**

**Yes**

Comments (if any):

---

**Q.4C.4 Do you agree that the list of sources for design guidance provided in Annex F should be replicated in the new TBK, for application to specialist building types?**

**Yes**

Comments (if any):

---

**Q.4C.5 Are there any specific concerns or issues with the updated references proposed in the Table in Annex F, that the Department should consider? If so, please provide details.**

**No X**

Comments (if any):

---

**Q.4C.6 Do you agree that requirements for air quality monitoring, similar to those introduced in England and Wales, should be included in the Phase 3 uplift package to Part K (Ventilation)?**

**Yes**

Comments (if any):

---

**Q.4C.7 Do you agree that requirements for increased ventilation rates to certain higher risk spaces, similar to those in England and Wales, should be introduced in Phase 3?**

**Yes**

Comments (if any):

---

**Q.4C.8 Do you agree that additional requirements for ventilation in offices, similar to those introduced in England and Wales, should be included in the Phase 3?**

**Yes**

Comments (if any):

---

**Section 4D: Electric vehicle infrastructure- Phase 3 proposals  
for buildings other than dwellings**

---

**Q.4D.1 Do you agree with the proposed use of Building Regulations to implement Article 8.2 for the provision of EV charging point infrastructure at buildings other than dwellings?**

**Yes**

Comments (if any):

As with domestic Building Control do not look at the number of parking spaces provided and it is felt that this would be better looked at earlier in the design process

---

**Q.4D.2 Do you agree that ducting infrastructure for one in five parking spaces and one CP, should be installed when a non-residential buildings with more than 10 non-residential car parking spaces is being erected or is undergoing a major renovation?**

**Yes**

Comments (if any):

As above

---

**Q.4D.3 Do you agree with the proposed limitations (outlined in para 4D.13-4D.18) to the application of EV charging requirements for new non-residential buildings and for major renovations of such buildings? If not, please comment on how should they should be changed.**

**Yes**

Comments (if any):

Limitation 1 – number of parking spaces not determined by Building Control  
Limitation 3 – this work might be carried outside the scope of a building control application for major renovation  
Limitation 4 – Building Control is not in a position to determine if the installation would exceed 7% costs of renovations

Review of energy efficiency requirements and related areas of Building Regulations –  
CONSULTATION RETURN FORM

---

**Q.4D.4 Do you agree that more onerous residential requirements should apply in mixed-use building situations and shared parking arrangements?**

**Yes**

Comments (if any):

## Section 5: Considerations for Phase 4 uplifts

---

**Q.5.1 Do you agree that, for Phase 4, the Department should expect to replicate measures introduced in England's Future Homes and Future Buildings (2025) in the first instance, or is there a particular administration that we should seek to align with for Phase 4? If possible, please provide supporting evidence for your preference?**

**Yes** Comments (if any):

As we are reliant on software providers whose main market is England it would be better to align with England.

---

**Q.5.2 Would you support a ban on direct emissions heat generators or combustion appliances, similar to Scotland's measures banning such appliances? (Please take into account your answer to Question 3A.23 on which Option you have supported.)**

**No**

Comments (if any):

No as it is not evident that the current infrastructure is capable of supporting a change that requires all buildings to have heat pumps.

---

**Q.5.3 Do you support efforts to more closely align the NCM and targets towards passive house standards, where possible?**

**No**

Comments (if any):

No as there will be less standardization of dwellings leaving harder for building control to determine what are acceptable levels therefore adding to an already complex assessment time, also not sure if the industry has the skill in place that would be required.



---

**Q.5.4 Have you any advice or evidence as to how further verification measures might help ensure the standard is delivered in practice (please provide details)?**

**No**

Comments (if any):

---

**Q.5.5 Are there any other particular or detailed issues that the Department should be considering for new build Part F requirements for non-domestic buildings as part of Phase 4 developments?**

**No**

Comments (if any):

---

**Q.5.6 Are there any other issues which the Department should be considering for Phase 5? Please note that some further/concurrent issues are discussed in Section 6 which may influence input on this.**

**No**

Comments (if any):

## Section 6: Concurrent issues - headline summary

---

### Section 6A: National Calculation Methodology issues

---

**Q.6A.1 Do you agree that the local NCM should be consistent with England? If not, please provide any particular thoughts on how it should be varied, for example with the use of a local NI weather file, or with local cost or carbon intensity factors, rather than UK averages, in building regulation assessments.**

**Yes**

Comments (if any):

Agree

---

### Section 6B: Embodied Carbon

---

**Q.6B.1 Do you have any comments on EPDs that you would like to bring to the attention of the Department at this stage?**

**No**

Comments (if any):

---

**Q.6B.2 Have you any insight or evidence on the likely professional costs incurred in carrying out a whole lifecycle assessment of carbon in a project? For example, is it likely to be comparable to the cost of a traditional Bill of Quantities? If so, what phases of the lifecycle assessment and data were included?**

**No**

Comments (if any):

---

**Q.6B.3 Have you any opinion or insight on how to address any of the challenges listed? For example, a view on the extent and scope of assessments.**

**No**

Comments (if any):

---

**Q.6B.4 Do you agree that the intricacies and implications of embodied carbon mean that it is best considered at a UK wide level and that the Department should concentrate efforts on attending to the current gap in standards compared to other regions, in the first instance?**

**Yes**

Comments (if any):

Due to the complexities involved with embodied carbon assessments these would be better dealt with at a UK wide level as building control may struggle with capacity to oversee and manage any enforcement requirements.

---

**Q.6B.5 Would you support the development of an advisory Information Note or Appendix to Technical Booklets on Part F to support embodied carbon assessment?**

**No**

Comments (if any):

As any advisory note will not be enforceable by Building Control the information is unlikely to be looked at so may be a waste of resources at this time to develop it.

---

**Q.6B.6 Have you any practical suggestions for how circular economy principles may be best encouraged in construction or, if necessary, regulated for in the future?**

**No**

Comments (if any):

---

## **Section 6C: Over-sized new homes**

---

**Q.6C.1 Have you any evidence on new-build dwelling sizes that should be taken into account in future policy making on larger dwellings?**

**No**

Comments (if any):

Building Control would be confident that the dwelling size data extracted as part of the consultation from EPC's would be reflective of what is being built.

---

**Q.6C.2 Do you believe that action should be taken to better highlight the higher total energy demand for large, less spatially efficient dwellings? If so, how should this be best achieved?**

Yes  No

Comments (if any):

It would be too late to highlight at the Building Control application stage by the time of the application it will have already gained planning permission and it is unlikely that any attention will be paid to the advice as this may require amended planning application. Any highlighting of the energy demand should be given at the early stages of design/planning

---

**Section 6D: Performance gap**

---

**Q.6D.1 Do you have any particularly local evidence on design vs as-built performance gaps?**

**No**

Comments (if any):

On site design changes occur regularly that means a recalculation of as built data.

---

**Q.6D.2 Do you have any evidence or insight supporting specific actions to address specific performance gaps in Parts F or K of the Building Regulations?**

**No**

Comments (if any):

There should be a more formalised process in place for the signing of by energy assessors.

|                     |   |
|---------------------|---|
| <b>Committee:</b>   | Environment & Sustainability                    |
| <b>Date:</b>        | 1 <sup>st</sup> November 2023                   |
| <b>Report from:</b> | Head of Service (Acting) - Environmental Health |

|                  |   |
|------------------|---|
| <b>Item for:</b> | Decision  |
| <b>Subject:</b>  | Notice of Motion – Impact of Animal Welfare Budget Cuts by the Department of Agriculture, Environment and Rural Affairs (DAERA) |

|     |   |    |
|-----|---|----|
| 1.0 | <b><u>Background and Key Issues</u></b>   |    |
|     | 1. Members are advised that a Notice of Motion, in the name of Councillor Nancy Eaton, was approved by Council on 24th October 2023 to be referred to the Environment & Sustainability Committee in November 2023 for consideration.  |    |
|     | 2. The Notice of Motion details concerns that the removal of Animal Welfare Regional funding from £1.25M to zero by DAERA will have a significant negative impact on the work carried out by local government for the protection of non-farmed animals and consequently could lead to more suffering and an increase in the mistreatment of said animals.   |    |
|     | 3. The Notice of Motion calls on the Council to write to the Permanent Secretary of DAERA to express opposition to this decision and to encourage an urgent alternative solution to be found.   |    |
|     | 4. Furthermore, given the significant pressures on the Animal Welfare function throughout Northern Ireland, Members request that Officers attending the Animal Welfare Strategic Board and the Multi-Agency Animal Welfare Forum keep Members apprised through the Environment and Sustainability Committee of the work of these groups and provide an opportunity for Members to contribute to their work. |    |
|     | 5. Members are requested to consider the Notice of Motion, attached as <b>Appendix 6 EH</b> , and indicate how they would like Officers to progress this on behalf of the Council.  |    |
| 3.0 | <b><u>Recommendation</u></b>  |    |
|     | It is recommended that the Notice of Motion regarding the Impact of Animal Welfare Budget Cuts by DAERA be considered and Members indicate how this is to be progressed on behalf of the Council.   |    |
| 4.0 | <b><u>Finance and Resource Implications</u></b>   |    |
|     | None.   |    |
| 5.0 | <b><u>Equality/Good Relations and Rural Needs Impact Assessments</u></b>  |    |
| 5.1 | Has an equality and good relations screening been carried out?  | No |
| 5.2 | Brief summary of the key issues identified and proposed mitigating actions <b>or</b> rationale why the screening was not carried out  |    |
|     | Not required – Notice of Motion seeking correspondence to be forwarded to DAERA to express concern at budget cuts by DAERA and to seek approval from the Committee for Members to be afforded the opportunity to contribute   |    |

|     |  |    |
|-----|--|----|
|     | to the work of the Animal Welfare Strategic Board and the Multi-Agency Animal Welfare Forum.   |    |
| 5.3 | Has a Rural Needs Impact Assessment (RNIA) been completed?   | No |
| 5.4 | <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>Not required – Notice of Motion seeking correspondence to be forwarded to DAERA to express concern at budget cuts by DAERA and to seek approval from the Committee for Members to be afforded the opportunity to contribute to the work of the Animal Welfare Strategic Board and the Multi-Agency Animal Welfare Forum.</p> |    |

|                    |  |
|--------------------|--|
| <b>Appendices:</b> | <b>Appendix 6 EH</b> - Notice of Motion proposed by Councillor Nancy Eaton |
|--------------------|--|

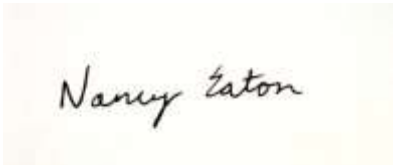
# Alliance

## NOTICE OF MOTION:

This Council considers the impact of cuts from DAERA to Animal Welfare in Northern Ireland from £1.25m to zero with great concern. These cuts have a high risk of negatively impacting the work done by local government in the protection of non-farmed animals in Lisburn and Castlereagh area and consequently could lead to more suffering and maltreatment of animals. The council will urgently write to DAERA Permanent Secretary to express opposition to this decision and to urge an alternative solution to be found.

Furthermore, given the significant pressure on Animal Welfare in Northern Ireland, we ask that through the Environmental Services Committee that Officers attending the Animal Welfare Strategic Board and those from the Multi Agency Animal Welfare Forum keep both members informed of the work of these groups and provide an opportunity to contribute to this work.

Signed:



Nancy Eaton



|                     |   |
|---------------------|---|
| <b>Committee:</b>   | Environment & Sustainability                    |
| <b>Date:</b>        | 1 <sup>st</sup> November 2023                   |
| <b>Report from:</b> | Head of Service (Acting) - Environmental Health |

|                  |                              |
|------------------|------------------------------|
| <b>Item for:</b> | Decision                     |
| <b>Subject:</b>  | Notice of Motion – Clean Air |

|     |  |    |
|-----|--|----|
| 1.0 | <b><u>Background and Key Issues</u></b>  |    |
|     | <p>1. Members are advised that a Notice of Motion, in the name of Councillor Sharon Lowry, was approved by Council on 24th October 2023 to be referred to the Environment &amp; Sustainability Committee in November 2023 for consideration.</p> <p>2. During the Covid Pandemic there were lessons learned of the importance of good ventilation and clean indoor air for health and productivity. The Notice of Motion seeks a commitment from Council to sign and implement the Covid Safety Pledge, thereby seeking to take all reasonable steps to enable use of Council facilities by all citizens, including the vulnerable and so further inclusion, as well as seeking to care for the health and wellbeing of Council employees.</p> <p>3. By signing and implementing the Covid Safety Pledge the Council will report on steps already taken to prioritise clean indoor air in Lagan Valley Island and other Council owned and operated facilities and outline what further or additional steps could be taken to improve indoor air quality for Council employees and service users. The Council will seek to develop and promote advice that can be followed to provide clean indoor air at events supported by Lisburn &amp; Castlereagh City Council.</p> |    |
|     | <p>4. Members are requested to consider the Notice of Motion, attached as <b>Appendix 2 EH</b>, and indicate how they would like Officers to progress this on behalf of the Council.</p>   |    |
| 3.0 | <b><u>Recommendation</u></b>   |    |
|     | <p>It is recommended that the Notice of Motion regarding the signing of the Covid Safety Pledge be considered and Members indicate how this is to be progressed on behalf of the Council.</p>  |    |
| 4.0 | <b><u>Finance and Resource Implications</u></b>  |    |
|     | None.  |    |
| 5.0 | <b><u>Equality/Good Relations and Rural Needs Impact Assessments</u></b>   |    |
| 5.1 | Has an equality and good relations screening been carried out?   | No |

|     |  |           |
|-----|--|-----------|
| 5.2 | <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>Not required – Notice of Motion in relation to the signing and implementation of the Covid Safety Pledge on behalf of the Council.</p>  |           |
| 5.3 | <p>Has a Rural Needs Impact Assessment (RNIA) been completed?</p>  | <p>No</p> |
| 5.4 | <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>Not required – Notice of Motion in relation to the signing and implementation of the Covid Safety Pledge on behalf of the Council.</p> |           |

|                    |  |
|--------------------|--|
| <b>Appendices:</b> | <b>Appendix 2 EH</b> - Notice of Motion proposed by Councillor Sharon Lowry. |
|--------------------|--|

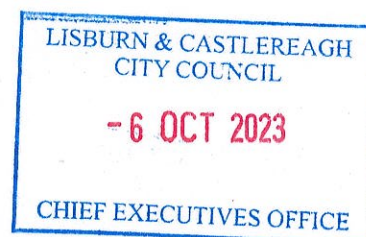
# Alliance

## NOTICE OF MOTION:

### Clean Air

"Having learned lessons of the importance of ventilation and clean indoor air for health and productivity during the Covid pandemic; and seeking to take all reasonable steps to enable use of all Council facilities by all citizens, including the vulnerable and so further inclusion; and seeking to care for the health and wellbeing of Council employees, this Council will explore the necessary requirements to signing and implementing the COVID safety pledge; to report on steps already taken to prioritise clean indoor air in Lagan Valley Island and other Council owned and occupied premises, and on what further or additional steps could be taken to improve indoor air quality for employees and service users; and to develop and promote advice that can be followed to provide clean indoor air at events support by LCCC."

Signed: \_\_\_\_\_ Cllr Sharon Lowry \_\_\_\_\_



2

|                     |   |
|---------------------|---|
| <b>Committee:</b>   | Environmental Services                          |
| <b>Date:</b>        | 1st November 2023                               |
| <b>Report from:</b> | Head of Service (Acting) - Environmental Health |

|                  |   |
|------------------|---|
| <b>Item for:</b> | Decision  |
| <b>Subject:</b>  | Christmas Eve Trading Hours for Large Retailers |

|     |   |    |
|-----|---|----|
| 1.0 | <b><u>Background and Key Issues</u></b>   |    |
|     | <ol style="list-style-type: none"> <li>1. The current trading hours under The Shops (Sunday Trading &amp;c.) (Northern Ireland) Order 1997 are from 1.00pm to 6.00pm (depending on the square footage of the store).</li> <li>2. The Council have received a request from the Centre Management at Bow Street Mall for special dispensation to be applied this year to permit shops with the relevant square footage to open from 12 noon on Sunday 24<sup>th</sup> December 2023.</li> <li>3. Typically footfall within shopping areas steadily declines from around 4.00pm on Christmas Eve, therefore, by permitting the large retailers to open from 12.00noon would benefit both the stores and the shoppers.</li> </ol> |    |
| 2.0 | <b><u>Recommendation</u></b>  |    |
|     | To support local businesses, it is recommended that Members approve the relaxation of Sunday Trading hours and permit large retailers to trade from 12.00noon on Sunday 24 <sup>th</sup> December 2023.   |    |
| 3.0 | <b><u>Finance and Resource Implications</u></b>   |    |
|     | None.   |    |
| 4.0 | <b><u>Equality/Good Relations and Rural Needs Impact Assessments</u></b>  |    |
| 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>Request for special dispensation to vary Sunday Trading Hours for large retailers to trade from 12.00noon on 24<sup>th</sup> December 2023.</p>  |    |
| 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.<br><br>Request for special dispensation to vary Sunday Trading Hours for large retailers to trade from 12.00noon on 24 <sup>th</sup> December 2023. |  |
|-----|---|--|

|                    |       |
|--------------------|-------|
| <b>Appendices:</b> | None. |
|--------------------|-------|

|                     |   |
|---------------------|---|
| <b>Committee:</b>   | Environment & Sustainability                    |
| <b>Date:</b>        | 1st November 2023                               |
| <b>Report from:</b> | Head of Service (Acting) - Environmental Health |

|                  |  |
|------------------|--|
| <b>Item for:</b> | Decision and Noting  |
| <b>Subject:</b>  | Update on Dog Fouling Initiatives including DNA Testing to Support the Prevention of Dog Fouling |

|     |  |    |
|-----|--|----|
| 1.0 | <b><u>Background and Key Issues</u></b>  |    |
|     | <ol style="list-style-type: none"> <li>1. At a meeting of the Environment and Sustainability Committee in September 2023 it was proposed that a report be tabled at a future date to revisit the feasibility of DNA Testing to support the prevention of dog fouling and to update Members on current dog fouling initiatives.</li> <li>2. A detailed report on DNA testing to support the prevention of dog fouling is attached as <b>Appendix 3 EH</b>. Given the limited success of the DNA testing initiative, significant start-up and ongoing revenue costs, and by the abandonment of such an initiative by other Councils, it is proposed that Members agree not to progress with this form of prevention.</li> <li>3. Dog fouling complaints have decreased year-on-year from 393 complaints received in 2020 to 250 complaints to date in 2023. With over 12,000 dogs licensed in the Lisburn &amp; Castlereagh City Council (LCCC) area, it is clear that the majority of dog owners exercise responsible dog ownership. There are a small number of owners who have less regard for this and it can have a negative impact.</li> <li>4. LCCC have used a range of innovative and engaging initiatives to effectively reduce dog fouling. These initiatives are included in <b>Appendix 4 EH</b> for Members' information.</li> </ol> |    |
| 2.0 | <b><u>Recommendation</u></b>   |    |
|     | It is recommended that the Committee:  |    |
|     | <ul style="list-style-type: none"> <li>• Note the recent initiatives being undertaken by the Dog Control Service in order to reduce dog fouling throughout the City; and</li> <li>• Agree not to progress with DNA testing of dogs for the purposes of preventing dog fouling.</li> </ul>  |    |
| 3.0 | <b><u>Finance and Resource Implications</u></b>  |    |
|     | The recommendations contained in this report result in no further finance or staff resource implications for the Council.  |    |
| 4.0 | <b><u>Equality/Good Relations and Rural Needs Impact Assessments</u></b>   |    |
| 4.1 | Has an equality and good relations screening been carried out?   | No |
| 4.2 | Brief summary of the key issues identified and proposed mitigating actions <b>or</b> rationale why the screening was not carried out   |    |

|     |   |    |
|-----|---|----|
|     | Screening will be carried out if the option is to be progressed.  |    |
| 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 <b>or</b> rationale why the screening was not carried out.<br><br>Screening will be carried out if the option is to be progressed. |    |

|                    |                      |   |   |
|--------------------|----------------------|---|---|
| <b>Appendices:</b> | <b>Appendix 3 EH</b> | - | <b>Detailed report on DNA testing to support the prevention of dog fouling.</b> |
|                    | <b>Appendix 4 EH</b> | - | <b>Update on dog fouling initiatives by the Dog Control Service.</b>            |

## Appendix 3 EH

**LCCC - Environmental Health Service Unit**  
**DNA Testing to Support the Prevention of Dog Fouling****1.0 Purpose of Report**

This report seeks to update Members on an outcome from September's Environment and Sustainability Committee where it was agreed that a report be tabled to a future Environment and Sustainability Committee to:

- revisit feasibility of DNA Testing to support the prevention of Dog Fouling;
- examine how the DNA Testing Initiative performed in Leitrim/other Councils and associated costs;
- report the outcome of consideration of DNA testing by NIDAG

Therefore, the following report considers the use of DNA sampling and analysis to identify dogs in an attempt to reduce the number of dog fouling incidents within the Council area.

**2.0 How It Works**

- The Council informs the public, and in particular pet owners, of the initiative and starts a pet owner profile by entering their information into the database.
- Registration is completed by collecting DNA with the DNA swab kit provided by PooPrints. For the initiative to succeed, the Council will have to establish a substantial database of dogs' DNA.
- When fouling occurs, a sample is collected with a waste collection kit provided by PooPrints.
- The sample is sent to a local collection point and picked up by PooPrints and taken to their base in America for analysis.
- Once analysis is completed if there is a match with a previous swab, the Council will be notified of their identity.

**3.0 Proposal – DNA Testing to Support the Prevention of Dog Fouling**

PooPrints are an American company that specialise in DNA dog waste management. They would advocate that the goal of PooPrints is to begin developing a long-term database of dogs within the Council area, while also causing deterring affects to current irresponsible dog owners.

**4.0 Pricing**

The costs of providing this service to the Council are as follows:-

- Swab Kit - collection, transport and analysis of swab - £47 per dog;
- Waste collection kit - collection and transport - £20 per waste sample;
- Waste sample analysis - extracting DNA and running against database - £70 per sample.



Below is a summary of the typical costs of one confirmed detection based on percentage participation e.g. with 10% participation it is assumed that 1 in 10 samples would yield a positive detection.

| Percentage participation | Swab kits | Waste collection kit | Waste sample analysis | TOTAL COST PER DETECTION |
|--------------------------|-----------|----------------------|-----------------------|--------------------------|
| 10%                      | £47       | 20 x 10 = £200       | 70 x 10 = £700        | £947                     |
| 20%                      | £47       | 20 x 5 = £100        | 70 x 5 = £350         | £497                     |
| 50%                      | £47       | 20 x 2 = £40         | 70 x 2 = £140         | £227                     |
| 100%                     | £47       | 20 x 1 = £20         | 70 x 1 = £70          | £137                     |

To establish the database of all current licensed dogs within the Lisburn & Castlereagh City Council area (12,281) the cost would be £577,207. Based on the total fouling complaints during 2022/2023 (295) analysis of one sample per complaint would cost £26,550 (£90 x 295). Administration costs for the scheme, including staff and marketing is estimated at £45,871. Total cost = £649,628.

To establish the database with 20% of the licensed dogs within the Lisburn & Castlereagh City Council area (12,281) the cost would be £115,441. Based on the total fouling complaints during 2022/2023 (295) analysis of one sample per complaint would cost £26,550 (£90 x 295) plus administrative costs of £45,871. Total cost = £187,862. It should be noted that pilot initiatives in other Councils have resulted in no positive identifications due to the low uptake of registration. Therefore, all costs incurred may result in no identification of offending dogs and their owners.

A dog licence fee is set in statute and costs between £0 and £12.50 depending on the circumstances of the registered owner.. The Council cannot adjust this fee. Furthermore, despite it being a legislative requirement to have a dog licence, there is every likelihood that a number of dog owners will not have licensed their dogs. It should be noted that a dog fouling Fixed Penalty fine is £100. Under this initiative, costs incurred to identify a dog through DNA testing would not be eligible for recovery over and above the legislative Fixed Penalty.

With regards to this initiative, we have no powers to encourage owners to DNA swab their dogs and it is unlikely that the majority of dog owners would be prepared to pay the £47 swab kit fee (before administrative costs) for this.

An incentive scheme may help to increase campaign uptake but may be costly to implement. It should also be noted that the scheme would only hold information on LCCC resident's dogs; therefore, the many visitors to our parks and attractions would not be included.

Members should note there is no provision within the existing budget for any the above DNA testing and analysis.

## 5.0 Legal Position of DNA Testing

In May 2021 we sought DAERA's opinion on the interpretation of the legislation and the use for DNA testing. DAERA confirmed that "it is not something that the Minister plans to introduce in Northern Ireland at this point". They cited the following reasons for their position:

- The majority of dog fouling offences can be attributed to irresponsible dog owners, who do not pick up after their dog. As such, the uptake of DNA swabbing among these owners is likely to be low, rendering a voluntary scheme ineffective.
- The administration and enforcement of a mandatory scheme, involving new legislation to enable the compulsory DNA swabbing of every dog in Northern Ireland, updating and maintaining the database, testing of dog waste in a laboratory and tracking and fining those guilty of an offence, is likely to be very costly.
- Even with a costly mandatory scheme, it is likely that a not insignificant number of irresponsible dog owners would still decide not to register their dogs with the scheme, making its potential success very uncertain.

## 6.0 **Benchmarking**

Following our last report to Committee, DNA testing was discussed at the Northern Ireland Dog Advisory Group (NIDAG) in May 2021. All Councils in NI are represented on NIDAG and all agreed that any scheme would rely on the voluntary sampling/swabbing of a dog's DNA. It was considered that the vast majority of dog owners would not be agreeable to voluntary sign up to such an initiative. The group questioned the feasibility of such a scheme based on a likely limited uptake rate, detection rate and prohibitive costs.

Furthermore, Officers have consulted with six Councils in England and three in Ireland who have investigated the feasibility of DNA testing. All have abandoned the initiative citing reasons summarised below.

- 
- It was deemed almost impossible to enforce because it would have to be a voluntary scheme as a national dog DNA database does not exist.
- People who will submit the DNA are responsible owners; such owners are less likely not to pick up their dog's waste.
- Deemed not cost effective and could fail if challenged in court.
- Significant cost implications to initiate such a pilot scheme.
- Unless a large proportion of owners register their dogs a positive match is unlikely.
- The practicalities of operating the program were deemed too complicated.

## 7.0 Conclusion

While a DNA dog testing initiative remains a voluntary scheme with no central government financial backing or legislation, it is unlikely to garner much support from dog owners. As such, there is a significant cost to Council to implement, with no ability to recover the cost outlaid. Additional costs would also be incurred for the marketing, management and implementation of the scheme. Pilot schemes elsewhere in the UK and Ireland have been abandoned due to substantial set up costs, low levels of detection and low uptake levels.

## 8.0 Recommendation

Based on the information gathered to inform this review, it is recommended that such an initiative should not be pursued further.

## **LCCC - Environmental Health Service Unit** **Detailed Report on Dog Fouling Initiatives**

### **1.0 Purpose of Report**

The purpose of this report is to provide Members with an update on the ongoing and recent work that is being undertaken by the Dog Control Service to tackle the issue of dog fouling and responsible dog ownership.

### **2.0 Background**

Dog fouling and irresponsible dog ownership go hand in hand and can impact the quality and amenity of our Council area. Clearly, whilst the majority of dog owners exercise responsible dog management, there are a small number of owners who have less regard for this and it can have a negative impact. This requires ongoing use of our resources to address the problem, in terms of its removal from the streets, as well as providing a wide range of education and awareness programmes together with the use of fixed penalties or other costly formal enforcement action where infringements are detected.

The Dog Control Service, as part of their role deploy routine monitoring patrols, to detect dog fouling incidents, however, it is widely recognised that the problem of dog fouling cannot be addressed solely by enforcement intervention. An important role of the Dog Control Service is also to carry out other statutory investigative work related to attacks, straying, licencing issues, noise issues and compliance with Dog Control Orders. To encourage a change in behaviour, a wider programme supporting responsible dog ownership is an essential element of the Council's approach to reducing the level of dog fouling.

### **3.0 Recent dog fouling initiatives and evaluation**

A number of initiatives and marketing strategies have recently been employed to help reduce dog fouling. As a result of these, we have seen a steady decrease in fouling complaints since 2020 as outlined below. Straying complaints have fluctuated within this same time period.

| <b>Year</b> | <b>Fouling complaints</b> | <b>Straying complaints</b> |
|-------------|---------------------------|----------------------------|
| 2020        | 393                       | 241                        |
| 2021        | 369                       | 204                        |
| 2022        | 273                       | 267                        |
| 2023*       | 250                       | 214                        |

\*year to date

Further details on each initiative and campaign is provided below.

#### **3.1 Dog Fouling Stencils**

We have continued the use of signage in areas where there appears to be an increase in the incidence of dog fouling. Temporary spray paint is used with the dog fouling stencils along paths in hotspot areas to highlight the problem and increase awareness of enforcement action. New signs and stencils, designed by local children through our Local Investment Plan initiative, have been recently purchased and these resources will also be used for future campaigns.

### 3.2 Dog Fouling Media Campaign

In November 2022, the Council launched a dog fouling media campaign where we generated awareness of our 'Pick it Up' campaign through radio advertisements, outdoor advertising (consisting mainly of bus and bus stop advertisements,) and social media bursts. Outdoor and radio advertising saw a good broad coverage of the campaign to a wide demographic. Through social media we reached an audience of 2,737,937 users resulting in a total of 20,831 link clicks. The campaign was launched on 7 November 2022 and in the preceding 5 months a total of 93 complaints were received. In the 5 months after the event 115 complaints were received with 122 complaints received during the 5 months of the campaign. The increase in complaints from the introduction of the campaign can be attributed to an increased awareness of fouling by members of the public.

### 3.3 Paint Means Poo

Our first Paint Means Poo initiative involved three community groups in Ballybeen, Manor Park and Glenavy who were invited to take part in this pilot DEA Project. The aim of the campaign was to highlight the problem of dog fouling, encouraging the local community group members to engage with the project and inspire irresponsible dog owners in that community to change their ways

Each participating community group was asked to provide details of willing volunteers, committed to undertaking the four-week campaign and to record the results and provide feedback. In return they received an information pack giving the necessary information to run and promote a campaign. Each nominated volunteer received their own pack including a can of eco-spray paint, a toolkit, risk assessment, recording forms, flyers giving details of the campaign, posters to be erected in the community informing of the campaign and new signage promoting the disposal of dog waste in regular litter bins. In addition, each group was assigned a Council Enforcement officer to help them through the four-week campaign. Prior to the commencement of the campaign the paths in the area were cleaned by our cleansing service. For four weeks dog fouling in the areas chosen was sprayed to highlight the problem. Recording forms were completed and returned at the end of the 4 week period.

It is recognised that the Paint Means Poo campaign only provides a 'snapshot' of the actual situation with respect to dog fouling in certain Council areas. The results suggest that this initiative was successful in all three areas showing a steady decrease over the four week period - particular improvement was noted in Glenavy. Successful campaigns have also taken place in Aghalee and Harmony Hill. Further paint means poo projects would be beneficial in building on the success of the campaign and utilising the data insight provided by the local volunteers. Overall, volunteers commented that the campaign had been successful, and that the incidence of fouling had reduced. It is recognised that without a dedicated and reliable team of volunteers, and the support of participating community groups, this initiative would not have been possible, and the feedback has been invaluable.

The scheme is due to commence in the Tonagh and Newtownbreda areas in November 2023.

### 3.4 Responsible Dog Ownership Education

Over the past number of years (except in 2021 and 2022) we have participated in Bee Safe and provided advice to approximately 1400 primary school children per year raising their awareness to the importance of responsible dog ownership and providing advice in relation to safety around dogs. This message is then shared at home with parents and relatives thereby reaching an even greater audience.

### 3.5 Changes to Fixed Penalty Amount

On 1 September 2023, the Fixed Penalty Fine for dog fouling and littering was raised from £80 to £100 (the fine will be reduced to £70 if paid within 10 days). This change emphasises the Council's commitment to maintaining cleaner communities and reinforcing the message that dog fouling and littering will not be tolerated. To facilitate the change some marketing material and resources were rebranded to include the new charges. Changes were made to; fixed penalty receipt book, signage, bin stickers, van artwork and calling cards. It is hoped that the increase in fix penalty will act as a further deterrent for dog fouling

### 3.6 Dog Control Orders

On 1 December 2019 the council enacted three new Dog Control Orders under the Clean Neighbourhoods and Environment Act to provide a useful tool to the ongoing work of the council in seeking to address all dog related issues.

The Orders meant that dogs will no longer be allowed on certain land within the council area, namely play areas, MUGAs, artificial pitches, bowling greens, tennis courts and golf courses.

The all year round exclusion also applies to Kirkwoods Road Playing Fields, Lough Moss Playing Field beside MUGA, Glenmore Playing Fields and Billy Neill pitches 4, 6 and 7. Furthermore, access to the majority of playing fields is restricted to 1st May to 31st August. Dogs must always be kept on a lead in cemeteries, burial grounds and caravan parks in the council area.

Finally, in open spaces to which the public are entitled to enter, a council officer may request that a dog be placed on a lead where necessary to prevent nuisance, annoyance or disturbance to a person or other animal.

### 3.7 Increased Social Media Presence

Following a request from the Environment & Sustainability Committee Chairman in September 2023, an increased presence on social media is to be considered. To enable this, Environmental Health is currently developing a social media and marketing plan in relation to dog fouling and litter. It is hoped that plan will inform residents what work is ongoing to tackle these issues on their behalf and support the work already underway.

### 3.8 Other Dog Fouling Initiatives

In a bid to reduce dog fouling in our Council area, various other initiatives have been undertaken in recent years:

- Promotion of 'Any Bin Will Do' in relation to disposing of dog poo bags. Prominent Stickers placed on litterbins in hotspot areas to ensure that dog walkers know they can use the bin for bagged dog fouling.
- Collaborative working with cleansing service
- Deployment of 3 active FIDO (Dog Faeces Collection & Disposal Unit) machines to clear fouling in areas most in need.
- Targeted Patrolling of known dog fouling hotspots by our Enforcement Officers including early morning and late evening patrols.
- Action days promoting responsible dog ownership, most recently at Little Green Allotments Open Day in August.
- Provision of additional bag dispensers in our parks and communities.
- Zero tolerance enforcement of dog fouling offences