**From:** [redacted]
**To:** Planning Office
**Subject:** LA05/2025/0400/F – Further Representation
**Date:** 07 September 2026 11:16:18
**Attachments:** [redacted]

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Dear Planning,

**Application Ref: LA05/2025/0400/F**

Please find attached a further representation in response to the latest letter from MRA Partnership Ltd, dated 4 September 2026, concerning DfI Roads request for further road improvements.

I would be grateful if the attached representation could be placed on the public planning file and taken into account in the assessment of the application.

Kind regards,
David Hyndman

Dear Planning,

**Application Ref: LA05/2025/0400/F**

I wish to submit a further representation in response to the latest letter from MRA Partnership Ltd, dated 4 September 2026, concerning DfI Roads request for further road improvements.

The MRA letter appears to argue that further widening requested by DfI Roads is difficult to justify, partly because of the potential loss of mature trees along Carrowreagh Road. However, this raises an important inconsistency.

The applicant has already submitted amended access/run-off arrangements which, from review of the drawings, appear themselves to require the removal of a section of mature trees in order to facilitate HGV access to the site. It is therefore difficult to understand how the applicant can now rely on permanent tree loss as a reason for resisting further road improvements sought by DfI Roads, when tree removal already appears to be a consequence of the access arrangements proposed by the applicant.

The attached appendix shows where an existing, mature tree line is to be removed.

- Fig 1.0 Highlights the trees the applicant is proposing to remove to provide runoff and sight lines for their "Upper Newtownards Road" approach.
- Fig 1.1 Shows clearly the tree line proposed for removal on Google Maps.
- Fig 1.2 – 1.5 shows photos of the existing mature tree line that the applicant has already proposed removal of.

**Given the above, how can this latest representation from the applicant show concern for the loss of trees around the driveway of No28 Carrowreagh Road? I would point out that what has already been proposed is considerably more impactful to the local area.**

This reinforces the wider concern that the site and road environment are inherently constrained for the type of HGV-dependent B3 industrial use proposed. The issue is not simply whether a localised access arrangement can be engineered, but whether the development can be accommodated safely and acceptably on Carrowreagh Road without unacceptable impacts, including road widening, tree loss, congestion, and conflict with existing road users.

The MRA letter also appears to rely heavily on the assumption that HGV traffic will be "predominantly arriving from the Upper Newtownards Road". However, given the frequent congestion on the Upper Newtownards Road, it is entirely foreseeable that drivers may use the rural approach to Carrowreagh Road as an alternative route.

I therefore ask that the applicant be required to clearly demonstrate how HGV routing would be controlled and enforced. In particular:

1. How can the applicant guarantee that HGVs accessing the site will approach from the Upper Newtownards Road direction?
2. What mechanism would prevent HGVs from using the rural Carrowreagh Road approach?
3. Would any routing restriction be secured by planning condition, legal agreement, traffic management plan, contract terms with suppliers/hauliers, or another enforceable mechanism?
4. Has DfI Roads assessed the proposal on the basis of real-world routing behaviour, including the likelihood of drivers avoiding congestion on the Upper Newtownards Road?

In my view, the latest MRA letter does not resolve DfI Roads concerns. Rather, it confirms that DfI Roads consider further information or improvement necessary, while the applicant's transport consultant is now seeking to argue that such improvement should not be required.

The planning authority should not rely on an unenforced assumption that HGVs will approach only, or mainly, from the Upper Newtownards Road. For a 24-hour industrial digestate facility served by regular HGV movements, the rural approach to Carrowreagh Road must be properly assessed unless there is a clear, enforceable and robust routing restriction in place.

I respectfully request that this representation is placed on the planning file and taken into account in the assessment of the application.

Kind regards,
David Hyndman

Appendix:

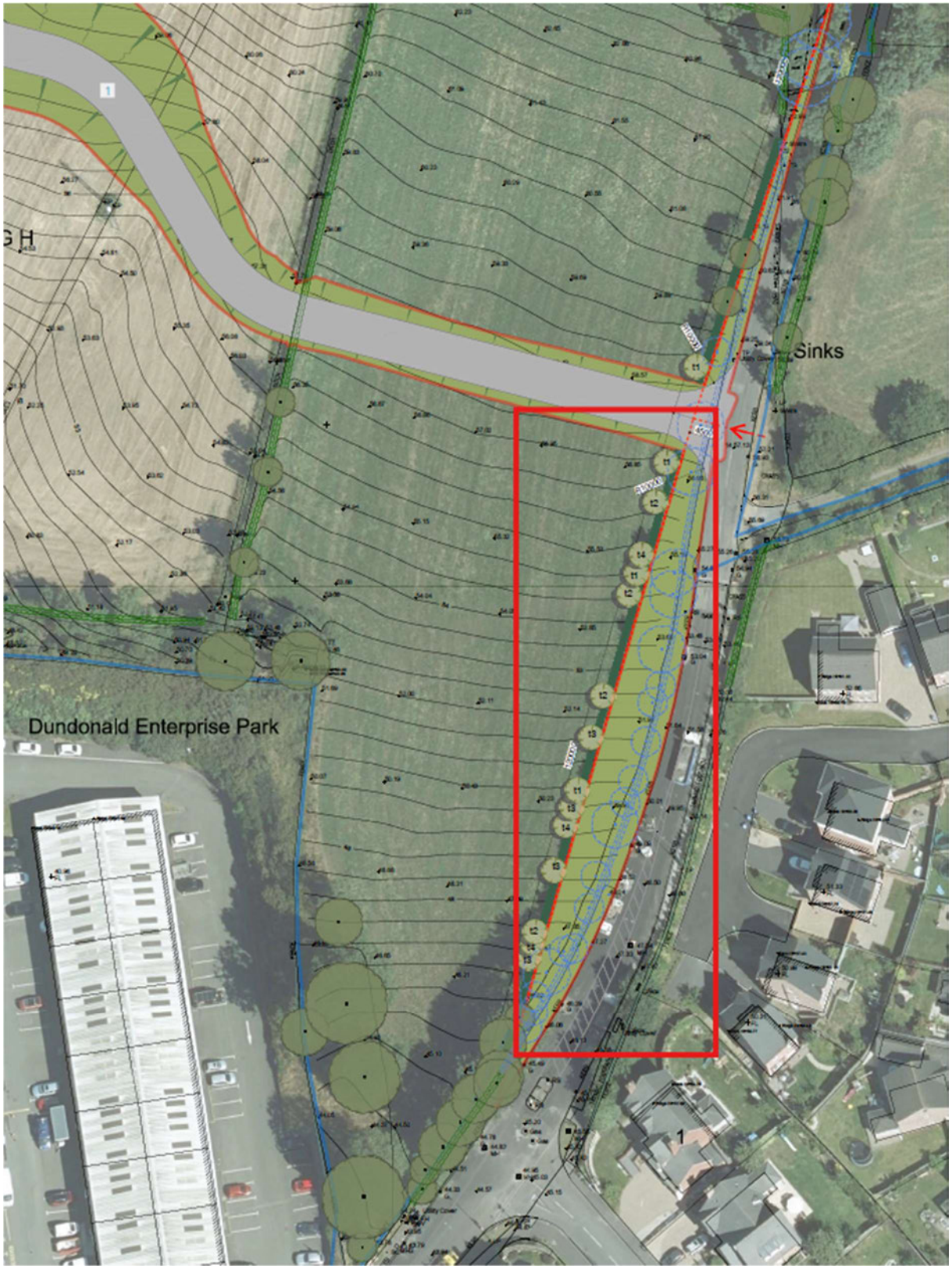



Fig 1.0 - Taken from applicants drawing of proposed site plans, mature trees marked in blue are to be removed to provide access/runoff.

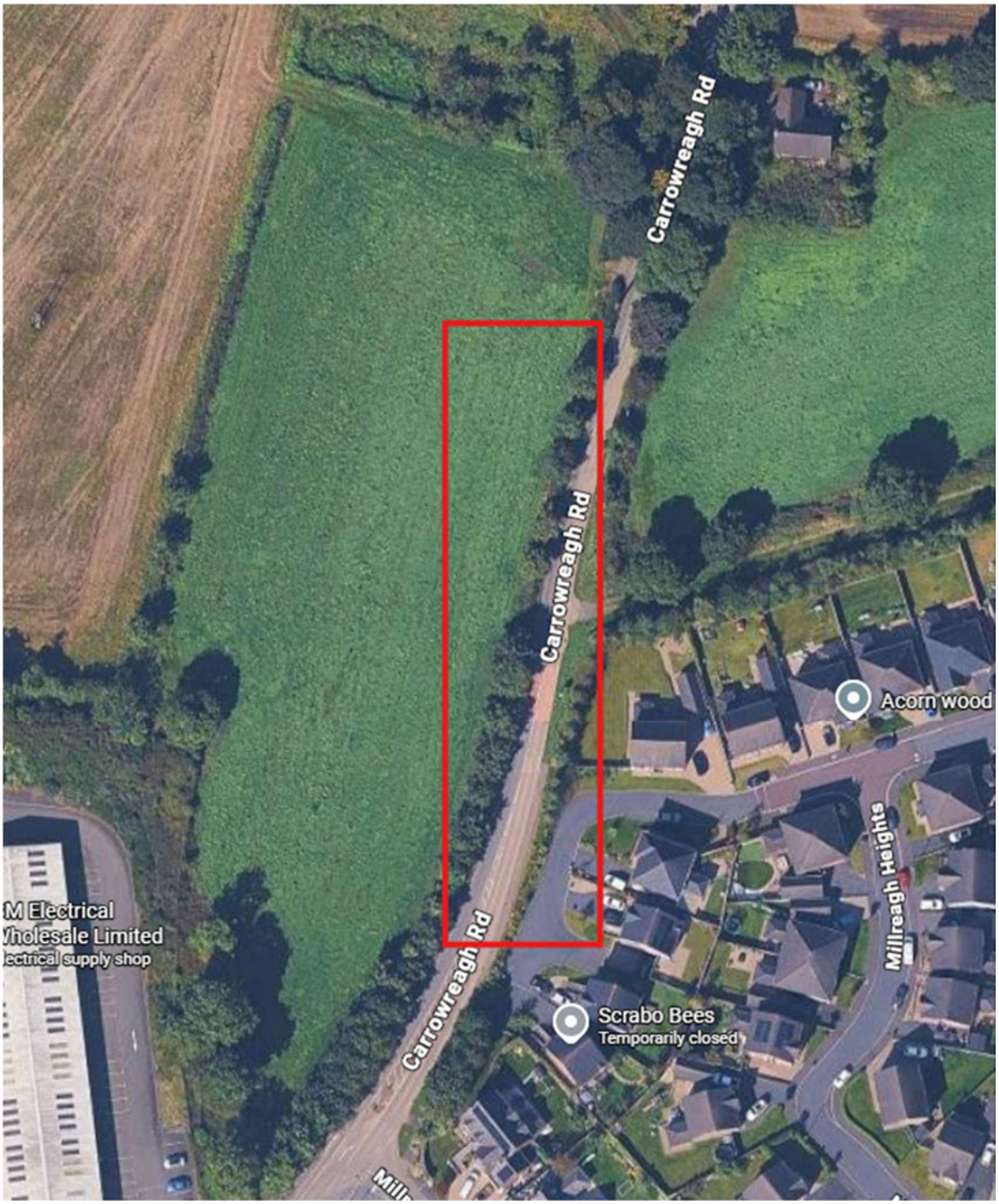



Fig 1.1 – Google maps aerial view of existing tree line for proposed removal from applicant.



Fig 1.2 Photo of current tree line proposed for removal on Carrowreagh Road coming from direction of Upper Newtownards Road.



Fig 1.3 - Photo of current tree line proposed for removal on Carrowreagh Road coming from direction of rural approach.



Fig 1.4 – Picture of tree line applicant proposes for removal, taken from entrance of Millreagh Development.



Fig 1.5 – Picture of tree line proposed from removal, opposite Millreagh, country approach.