Environment, Marine and Fisheries Group

& NIEA

Department of
Agriculture, Environment and Rural Affairs
www.daera-ni.gov.uk

Planning Response Team
NIEA Lisburn
17 Antrim Road
Tonagh
Lisburn BT28 3AL
Telephone: 028 9056 9604

Date: 30 September 2025

Dear Sir/Madam,

Planning Application Ref.:	LA05/2025/0400/F
Location:	Lands c. 120m southwest of No. 28 Carrowreagh Road, Dundonald, BT16 1TS

Proposal:

Proposed Class B3 General Industrial building to be used for anaerobic digestate management, new access, landscaping and ancillary site works

Thank you for your consultation on the above which was received by the Department on 27/06/2025.

This letter provides a single combined response for your consultation request across all of DAERA's area of environmental responsibility. Summary comments in relation to the reason for consultation are provided in the table below at Annex A, and, where appropriate, more detailed advice is enclosed and attached to this letter.

You should be aware that, in the absence of comment, no inference can be made on DAERA's position with regard to other environmental matters. It is the responsibility of the planning authority to ensure that all risks to the environment and requirements under environmental legislation and planning policy have been considered.

This advice and guidance will enable you to identify and consider if there are other potential risks to the environment due to impacts from the construction and operation of the proposed development and also its location.

In addition, we would also refer you to DAERA's published advice and guidance on development proposals where there is potential for effects on the natural and marine environments and fisheries interests, available at: https://www.daera-ni.gov.uk/topics/environmental-advice-planning.

As the Planning Authority is the competent authority under The Conservation (Natural Habitats, etc.) Regulations 1995 (as amended), this responsibility extends to the carrying out of Habitat Regulations Assessments (HRAs) before a planning decision is made.

Should you require assistance or if you wish to discuss anything further, please do not hesitate to contact the Planning Response Team using the contact details below.

Kind regards.

Planning Response Team

On behalf of DAERA

Email: **planningresponse.team@daera-ni.gov.uk**

Annex A

Advice Provided By:	Summary
Water Management Unit	Water Management Unit has considered the impacts of the proposal on the water environment and on the basis of the information provided are unable to determine if the development has the potential to adversely affect the surface water environment.
Natural Environment Division	Further information required

Water Management Unit

Section Reference: WMU/PC/ 37924-1

Date of Response: 02/09/2025

Considerations:

Water Management Unit has considered the impacts of the proposal on the water environment and on the basis of the information provided are unable to determine if the development has the potential to adversely affect the surface water environment.

All DAERA Standing advice referred to in this response unless otherwise stated can be found at the following link Standing Advice | Department of Agriculture, Environment and Rural Affairs

Explanatory Note:

Water Management Unit note this proposal is for storage and processing of digestate. The "Supporting Statement" document uploaded to the portal on 04 June 2025 section relating to Abatement Systems (Sec 3.11) states "The use of dry materials means there will be no effluent from processing*. During any necessary wash down of the building (anticipated to be once a year during shutdown), all run-off will be directed to a containment tank." The location of containment tank and its specific engineering characteristics do not seem to be indicated on any plan of the development uploaded in support of the application.

*Water Management Unit notes however that moisture will be added as part of the process.

Water Management Unit consider that any washings arising from the wash down of the building or any excess water / moisture runoff during the processing would be classed as an organic manure and should have adequate collection facilities and any hardstanding areas must be impermeable with engineered site containment, drainage system and must be serviced by a suitable collection tank. This must comply with the Nutrient Action Programme (NAP) Regulations 2019.

As Water Management Unit consider the contents of the tank would be classified as an organic manure, Water Management Unit require details of how the contents of this tank will be disposed of.

Water Management Unit notes a basic outline of the process has been provided.

Water Management Unit would request clarification of this procedure including,

- How moisture will be added to the material including measures to prevent any excess water producing an effluent.
- Details on the additional nutrient added during the process.

Utilisation of digestate is a critical environmental aspect of this and other developments, particularly since the cumulative impact of digestate (including additionally processed digestate) generated by this and other proposals may be significant.

Water Management Unit notes the development will take in digestate from up to eight AD plants currently in operation throughout Northern Ireland.

Water Management Unit would request details of the relevant AD Plants, the tonnage of digestate accepted from each, and the details of any Authorisation / Waste Management Licence held by these AD plants.

Water Management Unit notes the proposal intends to export the processed digestate however no details have been provided as to where the material will be exported, or what arrangements are in place to do so.

Where the applicant intends land spreading the contents of the tank (referenced above), then a Nutrient Management Plan will be required.

Where the material is to be exported to another farm or business, Water Management Unit require a contractual agreement.

Contractual Agreements must:

- Be signed by both parties,
- Set out the type of material and tonnages / quantity involved.
- Agreement should be for a minimum of 3 years,
- Must be dated and less than 12 months old.

Where material is to be Exported to the Republic of Ireland then Water Management Unit require a contractual agreement and additional information.

For full details of the type of information that may be required (Nutrient Management Plans / Contractual Agreements / Export agreements including to the Republic of Ireland) the applicant should refer to the advice on the DAERA website on Nutrient Management Plans.

Any Nutrient Management Plan, Contractual Agreement etc. must fully comply with the requirements outlined.
Nutrient Management Plan | Department of Agriculture, Environment and Rural Affairs (daera-ni.gov.uk)

In summary, Water Management Unit require further information in order a make a full assessment:

- An updated site plan showing the location of containment tank mentioned in the supporting statement to include adequate collection facilities and any hardstanding areas which must be impermeable with engineered site containment, drainage

system and must be serviced by a NAP Compliant collection tank. This must comply with the Nutrient Action Programme (NAP) Regulations (Northern Ireland) 2019.
- Details of how the contents of this tank will be disposed of including a NMP / Contractual Agreement / Export Agreement as appropriate.
- Details of how moisture will be added to the material including measures to prevent any excess water producing an effluent.
- Details on the additional nutrient added during the process.
- Details of the AD Plants supplying the digestate, the tonnage of digestate to accepted from each, and the details of any Authorisation / Waste Management Licence held by these AD plants.
- Details of where the processed digestate will be exported to including Contractual Agreement / Export Agreement as appropriate.

The planning Case Officer should note, where the applicant identifies exporting to a country outside Northern Ireland, they may wish to consult with the relevant authorities in that country for any considerations they might have.

The applicant must refer. and the proposal adhere, to all the relevant precepts contained in DAERA Standing Advice Agricultural Developments.

Should the applicant wish to submit further information to address these points Water Management Unit will be happy to consider it.

The Planning Case Officer should note, all information supplied relating to the utilisation of digestate for NIEA's consideration must be emailed directly in un-redacted form (including signatures). This includes all:
- Nutrient Management Plans
- Contractual Agreements
- Teagasc/DAFM Advisor Letters
- Signed Article 48 Authorisation from DAFM

All un-redacted information can be e-mailed to PlanningResponse.Team@daera-ni.gov.uk

The applicant should note it is an offence under the Water (Northern Ireland) Order 1999 to discharge or deposit, whether knowingly or otherwise, any poisonous, noxious, or polluting matter so that it enters a waterway or water in any underground strata. Conviction of such an offence may incur a fine of up to £20,000 and / or three months imprisonment.

The applicant should ensure that measures are in place to prevent pollution of surface or groundwater as a result of the activities on site, both during construction and thereafter.

Natural Heritage

Section Reference: CB36574-1

Planning Application number: LA05/2025/0400/F

Summary statement

NED has considered the available environmental information and concluded that the proposal lacks sufficient information to provide a substantive response to the consultation and to make an informed decision of potential impacts on the Designated Site Network.

Considerations

The application site is within 7.5km of the following nationally, European and internationally designated sites:

- Strangford Lough Ramsar and Belfast Lough Ramsar, which are designated under the Convention on Wetlands of International Importance, Ramsar 2.2.1971 (as amended);
- Strangford Lough SAC, Belfast Lough SPA, Belfast Lough Open Water SPA and Strangford Lough SPA, which are designated under the 'Conservation (Natural Habitats, etc.) Regulations (Northern Ireland) 1995 (as amended);
- Inner Belfast Lough ASSI, Outer Belfast Lough ASSI, Craigantlet Woods ASSI, Whitespots ASSI, Scrabo ASSI, and Strangford Lough Part 1 ASSI, which are declared under the Environment Order (Northern Ireland) 2002.

National Site Network considerations

In accordance with Regulation 43(1) of the Conservation (Natural Habitats, etc.) Regulations (Northern Ireland) 1995 (as amended), the Competent Authority must assess how these works, either alone or in combination, are likely to have a significant effect on the Designated Site Network and their selection features.

In accordance with part IV of the Environment (Northern Ireland) Order 2002 (as amended), the public body must assess how these works, either alone or in combination could adversely affect a site of National Importance. A development proposal may only be permitted where the associated public benefits clearly outweigh the value of the site, where the planning authority determines this is the case, they must notify NIEA and impose conditions sufficient to minimise the damage and restore the site.

NED acknowledge receipt of the following documents:

- Preliminary Ecological Appraisal
- Badger survey
- AQIA

NED has considered the document(s) made available on the public registry and can provide the following advice.

Explanatory note

NED has considered the proposal and highlights the following as potential impacts on the designated sites;

Designated Site Considerations

NED have considered and provided advice based on the most up-to-date scientific information available on the potential impact of proposals both alone, and if required, in-combination with other relevant plans and projects on the Designated Site Network.

Insufficient information has been submitted with the application to enable NED to make a considered response. NED recommends that further information is submitted so that a full assessment of the proposal and any potential adverse impacts on the designated sites can be undertaken.

NED acknowledge the Air Quality Impact Assessment (dated, 25/04/2025) and Supporting Statement (dated, June 2025). NED also acknowledge the objections which have been published to date (29.08.2025) and have considered their contents.

Natural Heritage Considerations

Using the information submitted, NED is content that the proposed development is unlikely to significantly directly impact priority habitats or priority species.

Although the PEA and Badger survey did not locate any badger setts within the 25m zone of influence, badgers are known to be active in the area, so there is a probability that badgers will utilise the site as a foraging ground. As a dynamic species there is the possibility that a badger sett could appear within the site boundary, should this occur before or during the development phase the applicant should contact their ecologist or the NIEA Wildlife Team.

NED notes that some vegetation may require removal and advises that the vegetation on the site may support breeding birds. All wild birds and their nests are protected under the Wildlife (Northern Ireland) Order 1985 (as amended), known as the Wildlife Order. NED thus advises that any removal of buildings/structures and vegetation on site should be undertaken outside the bird breeding season which occurs from 1st Match to 31st August, or checked by a suitably qualified ecologist with protective measures undertaken if any active nest is found.

NED notes that Craigantlet Woods SLNCI is within 2km of the development, NED notes that a revised AQIA is requested for the Designated Site issues and therefore advises that the SLNCI is also taken into consideration in the revised

Further Information

NED advises that the following information is supplied to enable a determination of the potential impacts on the designated sites:

1. Further information is required on the process from on-farm mechanical slurry separation to the pelletised end-product, with evidence that aerial emissions have been considered.

2. The Supporting Statement (dated, June 2025) explains that "the proposed facility will accept 15,000tpa of solid, or dried fraction of digestate produced from up to eight AD plants". No information has been provided on these AD plants. Clarification is sought on where these AD plants are located, along with their Waste Management License References.

3. Further information is required on how and where the drying of the digestate will take place. If not previously assessed, Air Dispersion Modelling will be required to assess the impact of the drying process on designated sites and priority habitats.

4. Based on the UNECE document[1], paragraph 258, on drying and pelletising of manure solids, "*increased ammonia loss is inevitable in the process, unless exhaust filtering or scrubbing and recovery is applied, or the solids are acidified prior to drying*". It is also not clear where the combining of the digestate with additives will take place or where the conditioning process will occur. Further information is sought on this.

5. Revised Air Dispersion Modelling (ammonia, NOx and nitrogen deposition) should be provided that assesses the impact on designated sites and priority habitats of aerial emissions from each stage of the application process, including (but not limited to);

    a) The loading of the solid digestate into the building when the doors or open or confirmation if there will be negative pressure to prevent the release of fugitive emissions;

    b) Storage of digestate when combining with additives and mixed;

    c) The conditioning process where moisture and heat are added to the 'blend mix';

    d) The pelletising process;

    e) Vehicular emissions (including HGVs) if within 200m of designated sites or priority habitats.

6. Manufacturer Specification of UV treatment and carbon filter to be used at the facility, as specified in Section 5.2.1 of the Air Quality Impact Assessment (25 April 2025)

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[1] [1] Bittman, S., Dedina, M., Howard C.M., Oenema, O., Sutton, M.A., (eds), 2014, Options for Ammonia Mitigation: Guidance from the UNECE Task Force on Reactive Nitrogen, Centre for Ecology and Hydrology, Edinburgh, UK

7. Further information on the nature of the minerals to be added to the digestate and the final destination of the pelletised material.

Informative

The applicant is referred to standing advice to protect hydrological connections to designated sites from pollution: Standing advice for the water environment

Note, revised technical guidance to inform the assessment of air quality impacts on the natural environment will be finalised and uploaded onto the DAERA website as soon as possible