bell | rolston

Lands c. 120m southwest of No. 28 Carrowreagh Road, Dundonald, BT16 1TS

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

Supporting Statement
June 2025



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Date of Issue: June 2025

1. INTRODUCTION

1.1 This supporting planning statement has been prepared on behalf of Blakiston Houston Estate Company Ltd. (hereafter BH Estates) in relation to a proposal for the following development on lands circa 120m southwest of No. 28 Carrowreagh Road, Dundonald, BT16 1TS:

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

1.2 This statement is structured as follows:

- Site Context;
- Proposed Development;
- Planning Policy Compliance; and
- Conclusion.

2. SITE CONTEXT

Site

2.1 The site (<1ha in size) comprises two agricultural fields. The proposed access from Carrowreagh Road will pass through an improved grass field with the proposed building located in a field currently in use for arable crop. The fields are bound by hedgerow/trees.

2.2 The topography of the site slopes to the south, to the rear of the existing industrial estate. A ditch is located to the south of the site.

Surroundings

2.3 As above, there is an existing industrial estate which bounds the application site to the south. To the west and north is further agricultural land with residential development (Millreagh) located to the east.

2.4 The main farmyard and office for BH Estates is located to the north of the site (No. 28 Carrowreagh Road).

Planning History

2.5 Outline planning permission (Y/2002/0554/O) was previously granted on 05 March 2010 for "site for industry and commerce" at land to the north of Dundonald Industrial Estate and Dundonald Enterprise Park, Carrowreagh Road, Dundonald. The applicant was BH Estates.

2.6 No Reserved Matters or full applications followed this grant of outline permission.

3. PROPOSED DEVELOPMENT

3.1 This planning application submission is concurrent with a £4m award in October 2024 to BH Estates by the Department of Agriculture Environment and Rural Affairs ("DAERA") as a Small Business Research Initiative ("SBRI") Phase 2 project under the Sustainable Utilisation of Livestock Slurry ("SULS") programme.

3.2 The aim of the BH Estates project is to develop a supply chain and manufacturing facility that enables the capture and export of excess organic nutrients including phosphorus and nitrogen from the rural economy, and to export those as commercial products from digestate, such as organo-mineral fertiliser in this case. This will assist Northern Ireland's agriculture sector to reduce excess phosphorus from livestock slurry, reduce ammonia loss from livestock slurry and reduce the effect of nutrient oversupply on water bodies in Northern Ireland. The project sits under the Lough Neagh Action Plan.

Process

3.3 The proposed facility will accept 15,000tpa of solid, or dried, fraction of digestate produced from up to eight AD plants currently in operation throughout Northern Ireland. The dried digestate is delivered via HGVs and unloaded by reversing into an available top loader/delivery bay within the proposed building. An additional 15,000tpa of mineral fertiliser additives will be delivered by road tanker for tanker blown loading into the silos located within the proposed building.

3.4 The digestate is removed at a controlled rate by way of conveyors and combined with additives from each silo in turn to a mixing process to produce a "blend mix". A stabilising element is additionally dosed into the blend mix. The blending process stabilises the nitrogen, ammonia and phosphate contained within the feedstock and helps to achieve a formula required for future use as a fertiliser.

3.5 Post mixing, the blend mix undergoes a conditioning process where moisture, heat and other nutrient additives are introduced. The conditioned blend mix is fed into a pelletising line where the pellets are then cooled, cleaned and passed to storage.

3.6 Pellets are passed to an interim storage capacity prior to bagging into 1,000kg Flexible Intermediate Bulk Container ("FIBC") units. The facility will produce up to 30,000tpa of organo-mineral fertiliser product.

3.7 The blending process will operate continuously 24 hours per day, Monday to Sunday. Deliveries to the site will be limited to day-time hours where possible.

Abatement Systems

3.8 Several abatement systems are incorporated into the design of the facility to minimise potential adverse impacts on the environment and human health.

3.9 These include the indoor delivery, handling and blending of the digestate and mineral additives with fast acting roller shutter doors located on the proposed building.

3.10 A Local Exhaust Ventilation ("LEV") system will be installed within the building to collect and transfer dust into a suitable dust filter. In addition to dust, under a separate airflow, the LEV will capture odour emissions for Ultra-Violet ("UV") treatment prior to passing through a carbon filter. The treated and abated emission airflows (dust and odour) will be combined and discharged to the atmosphere via a single emission point, the proposed stack.

3.11 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.

Proposal

3.12 The proposed development comprises of the following elements as illustrated on the accompanying site layout plan:

- *Industrial Building;*

3.13 The proposed building measures 50.72m x 51.26 with a total gross floor area of 2,598 sq.m. It is of typical construction with profiled metal wall and roof cladding, roof-mounted solar PV to the south facing roof and roller shutter doors. The proposed finished floor levels of the building step down to assist with the sloping site. A proposed stack (16.9m in height) is located on the western elevation of the building. Wall mounted (at 6m) external lighting is also proposed in the locations as shown.

- *New Access;*

3.14 A new access is proposed from Carrowreagh Road. It has been designed to accommodate traffic for the wider industrial zoning with splays of 4.5 x 120m.

- *Entrance/Exit Gates and Perimeter Fencing;*

3.15 Two 2.1m high sliding gates are proposed providing a separate entrance and exit from the facility onto the internal access road. The site will be secured by way of 2.1m high mesh panel fencing around the perimeter.

- *Yard Area; and*

3.16 A yard area to be finished in concrete is proposed around the building. This provides space for loading/unloading bays, enabling HGVs to turn within the site and car parking (8no. spaces shown).

- *Landscaping.*

3.17 Replacement hedgerow / tree planting (native species) is proposed behind the new visibility splays along with compensatory "filling in" of the broken hedgerow located along the southern field boundary.

4. PLANNING POLICY COMPLIANCE

Local Planning Policy

4.1 Section 45(1) of the Planning Act (Northern Ireland) 2011 requires regard to be had to the Local Development Plan (LDP), so far as material to the application and to any other material considerations.

4.2 Section 6 (4) states that where regard is to be had to the Development Plan, the determination must be made in accordance with the Plan unless material considerations indicate otherwise.

4.3 Lisburn and Castlereagh City Council ("the Council") has now adopted its Plan Strategy entitled 'Lisburn and Castlereagh Local Development Plan 2032'. In line with the transitional arrangements set out in the Schedule to the Planning (Local Development Plan) Regulations (Northern Ireland) 2015 (as amended), the Local Development Plan ("LDP") now becomes a combination of the Departmental Development Plan ("DDP") and the Plan Strategy read together. Any conflict between a policy contained in the DDP and those of the Plan Strategy must be resolved in favour of the Plan Strategy.

4.4 The extant DDP for the site is the Belfast Urban Area Plan 2001 ("BUAP").

4.5 The BUAP denotes the site as zoned for industry and commerce within the development limit.

4.6 While the draft Belfast Metropolitan Area Plan ("dBMAP") is not a DDP as it was not adopted, it remains a material consideration.

4.7 In its post inquiry form, dBMAP 2015 shows the site is zoned as existing employment (MCH 06) within the development limit.

4.8 Zoning MCH 06 stipulates a number of Key Site Requirements ("KSRs") for the partially developed zoning as follows:

- *Development shall only include the following uses*
    - *Industrial and Business, Use Classes B1(b), B1(c), B2, B3 and B4 as currently specified in the Planning (Use Classes) Order (Northern Ireland) 2004;*
    - *Only Industrial and Business, Use Classes B1(b), B1(c) and B(2) shall be acceptable in the northern / undeveloped portion of the site adjacent to existing housing in order to protect the amenity of the residential dwellings;*

4.9 The proposed use of the building (B3 General Industrial) is compliant with the use classes specified. Its location is not adjacent to existing housing and the accompanying assessments demonstrate no unacceptable impact on residential amenity. Further, it is located outwith the hatched areas highlighted as part of the previous outline permission whereby only Class B1 and B2 were considered acceptable.

- *Development of the site shall only be permitted in accordance with a masterplan for the site to be agreed with the Department. This shall outline the design concept, objectives and priorities for the site;*

4.10 The access has been designed to accommodate the wider zoning and further development can be established off the main internal access road.

- *A Transport Assessment (TA), agreed with Roads Service, DRD, shall be required to identify any necessary improvements to the road network/public transport/transportation facilities in the area. In addition to the need for a TA and the requirements identified herein, this proposal shall seek to reduce the number of accesses from the existing employment development onto the Carrowreagh Road and provide capacity improvements to the junction with the A20 Upper Newtownards Road; and*

4.11 Road improvements have been completed/approved at the Upper Newtownards Road junction to enable on-going developments on the Carrowreagh Road. The proposed industrial building and the associated traffic generation (see TAF provided) does not merit a Transport Assessment and/or additional road improvements to be carried out.

- *A comprehensive landscaping scheme for the proposed development shall be submitted with any planning application for development and agreed with the Department. This shall include all of the following:-*

    - *The existing vegetation along the northern and eastern boundaries of the site shall be retained (unless otherwise determined by the Department) and supplemented with an additional 5-10 metres of buffer planting consisting of trees and planting of native species to help integrate the development into the surrounding countryside. Planting along the northern boundary shall take account of the nature conservation interests of Craigantlet Woods SLNCI and Dunlady Glen LLPA; and*

    - *The western boundary of the site along the undeveloped portion of the site (which separates the site from the adjoining housing development) shall be landscaped with a 5-10 metre buffer of trees and planting of native species to provide screening for the development and protect the amenity of adjacent residential properties.*

4.12 The proposed development does not impact the western or northern boundaries of the site. The existing vegetation along the eastern boundary is required to be removed to facilitate access and visibility splays, however, replacement planting is proposed as shown.

Regional Planning Policy

4.13 As the Plan Strategy has now been adopted, Operational Policies set out in Part 2 of the Plan Strategy have come into effect and the existing suite of regional Planning Policy Statements ("PPSs") no longer apply.

4.14 Policy ED1 Economic Development in Cities and Towns states that a development proposal for Class B2, B3 and B4 use will be permitted:

a. on zoned employment land identified in the Local Development Plan where it is demonstrated that the proposed use is compatible with adjacent or nearby uses and is of a scale, nature and form appropriate to the existing area.

4.15 The application site is located on zoned employment land in both the BUAP and dBMAP and the accompanying assessments demonstrate that the proposed use is compatible with adjacent uses. The scale of the proposed building is largely dictated by its function with floorspace required for storage/processing and the building height necessary to accommodate HGV loading/unloading. The photomontages accompanying the application demonstrate the proposed building will be viewed alongside adjacent industrial development.

4.16 Policy ED7 relates to the retention of zoned land and economic development. It states that development that would result in the loss or building zoned economic development in a Local Development Plan to other uses will not be permitted, unless the zoned land has been substantially developed for alternative uses.

4.17 As an industrial use is proposed for the building this policy is not engaged.

4.18 Policy ED9 General Criteria for Economic Development sets out that any proposal for economic development use outlined in Policies ED1 to ED8 will also be required to meet a number of criteria relating to amenity and environmental impacts. As demonstrated by the accompanying assessments, the proposal will not result in any unacceptable impacts.

4.19 In summary, the proposal is compliant with all relevant planning policy as contained with BUAP/dBMAP and the Plan Strategy (Policy ED1/ED9).

5. CONCLUSION

5.1 This application seeks full planning permission on behalf of BH Estates for a proposed industrial building to be used for anaerobic digestate management.

5.2 BH Estates have recently been awarded £4m from DAERA as part of an SBRI. The aim of the BH Estates project is to develop a supply chain and manufacturing facility that enables the capture and export of excess organic nutrients including phosphorus and nitrogen from the rural economy, and to export those as commercial products from digestate, such as organo-mineral fertiliser in this case. This will assist Northern Ireland's agriculture sector to reduce excess phosphorus from livestock slurry, reduce ammonia loss from livestock slurry and reduce the effect of nutrient oversupply on water bodies in Northern Ireland. The project sits under the Lough Neagh Action Plan.

5.3 The process to take place within the proposed building entails the blending of dried digestate with other mineral additives to produce a pelletised product with an optimum nutrient profile for re-sale.

5.4 The application site is located on zoned industrial land where Policy ED1 sets out a presumption in favour of industrial development (Class B3). The accompanying assessments demonstrate that the proposal will be compatible with adjacent uses and is of a scale, nature and form appropriate to its location.

5.5 The proposal is therefore considered to comply with all relevant policy and material considerations.