

To:

Planning Department

Newry, Mourne and Down District Council
O'Hagan House
Monaghan Row
Newry
BT35 8DJ

Planning@nmandd.org

Re: Objection – Planning Application LA07/2025/0465/F (ReGen Waste Ltd)

Dear Sir/Madam,

I write to object to Planning Application LA07/2025/0465/F, submitted by ReGen Waste Ltd, for external storage of baled materials (including RDF and SRF) over a 3,300 m² area, stacked to 8 metres high without fire breaks or odour control.

WISH “Reducing Fire Risk” Guidance

The WISH Forum’s WASTE28 guidance (March 2020) stipulates best practices for bale storage:

- Bales must not be stacked in continuous vertical “chimneys” but interlaced or separated to reduce ignition risk.
- Recommended maximum of 4 bales high, to avoid collapse and rapid fire spread. The proposed 8m single block is contrary to these safety standards.

Please provide details on the management of stored waste with reference to Sections 5, 7 and Appendix 1 of the Waste Industry Safety and Health Forum (WISH) – Reducing Fire Risk at Waste Management Sites, including but not limited to:

- (i) Firewall height.
- (ii) Maximum height (h) of 4 metre stacks, or four bales high whichever is the lowest, based on practical ability to fight fires using manual means such as standard hoses.
- (iii) Maintaining a 1 metre gap between the top of each stack and the top of the firewalls to allow sufficient space for potential flames to reduce the risk of fire spreading.
- (iv) Stability of bale stack to reduce the risk of fire spread from falling/rolling waste bales and requiring competent advice on the stacking of bales.
- (v) Consider access for the fire service when planning construction of firewalls.

RDF Industry FPP Guidance – 450 m³ Safety Limit

The RDF Industry Group’s (of which Regen is a member) Fire Prevention & Mitigation guidance limits pile volume to 450 m³.

“If you want to store as many RDF bales as possible in a compliant pile (450 m³)”
The proposed storage significantly exceeds this volume without justification or mitigation.

DAERA/NIEA RPS – Material Storage Safety

DAERA/NIEA regulatory position statements mandate:

- **Maximum block size of 450 m³**, with adequate **fire separation**.
- Bales should be **inspected daily**, kept on impermeable surfaces, and **wrapped** to limit fire and odour risk.

The current proposal fails to meet these essential requirements.

Public Safety and Environmental Concerns

The proposal’s lack of fire breaks and odour containment:

- Contravenes established, site-specific standards.
- Increases the risk of large-scale fire events and smoke/odour nuisance to nearby communities.
- Fails to reflect recognized best practice or regulatory compliance.

Request for Council Action

I respectfully request that Newry, Mourne & Down District Council **refuse planning permission** unless the applicant:

- Reduces storage height to **no more than 4 bales**.
- Limits each block to **≤ 450 m³**.
- Provides **clear fire breaks/interlacing**, fire suppression systems, and odour controls.
- Incorporates daily bale inspections and impervious base provisions.

Without these safety and environmental safeguards, this proposal is contrary to public interest and regulatory guidance.

Yours faithfully,