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Richard Heaney
Causeway Coast and Glens Borough Council
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Our ref: 18-318/WTS/01

Re: Planning Application LA01/2024/1187/F. Use of existing waste transfer station to allow for storage and transfer of dry recyclables and mixed municipal wastes due to closure of existing landfill site (Amendment to planning permission C/2002/1040/F - Shed for the storage and transfer of dry recyclables) , Craigahulliar Landfill Site, Ballymacrea Road, Portrush.

Dear Mr Heaney,

I write on behalf of Blairs Caravans Limited who own and operate the holiday park at Craigahulliar.

Firstly, we welcome the Council's commitment to close the Craigahulliar Landfill site over the coming years and to restore the site to some form of positive after-use.

Craigahulliar Holiday Park has been in operation since 2018 as a neighbour of the landfill site. In that time the normal day to day operations at the landfill site have caused no major issues for Blairs Caravans. However, this current proposal will fundamentally change the way that mixed municipal waste, which will include “black bin” putrescible matter, is going to be handled and that concerns my client. By the Council's own assessment (July 2024), 22.5% of black bin content was food waste which shouldn't be there. We believe there is risk of odour where this problem doesn't presently exist.

Retained Planning Policy PPS 11 sets out policy for planning and waste management facilities. While planning and pollution control regimes are complimentary and planning decisions should assume that a pollution control regime will be properly applied and enforced, Policy WM1 states that:

“proposals for the development of a waste management facility will be subject to a thorough examination of environmental effects and will only be permitted where it can be demonstrated that all of the following criteria are met:

- *The proposal will not cause demonstrable harm to human health or result in an unacceptable adverse impact on the environment*
- *The proposal is designed to be compatible with the character of the surrounding area and adjacent land uses”*

There are a further 10 criteria. Essentially, the onus is on the Council to scrutinise the proposal in detail at the planning application stage. Potential problems should not be “kicked down the road” to licensing.

It has not been demonstrated (in the planning submission or the professional planning officer’s report) how including mixed municipal waste (which will be more odorous than only dry recyclables) will not have a potential adverse impact on surrounding land uses.

An Odour Management Plan (OMP) dated October 2024 was submitted with the application:

1. The *“identification of sensitive receptors”* in the OMP states *“the closest dwelling to the proposed development boundary is approximately 200m to the north west of the WTS building”*. There is no mention of the holiday park as a “sensitive receptor”. This omission should be addressed and all sensitive receptors should be correctly identified and assessed.
2. How waste will be brought onto and off site should be explained. This waste will now travel past the holiday park twice (arriving to the Waste Transfer Station (WTS) for storage and then leaving the WTS again for a new destination). Measures to prevent waste in transit creating odour should be detailed.

Section 2 of the OMP suggests means of Odour Control during the operation of the facility:

3. Roller doors are only to be opened to allow a vehicle to entry and exit the building. This should be a planning condition (if planning permission is granted).
4. At other times (including when waste is being moved about inside the WTS), these roller doors are to remain closed. The pedestrian access door should also be closed at these times. This should be controlled with a planning condition.

5. An odour suppression system is proposed, but no details have been provided. When will this system will be activated and by whom? This should be detailed and conditioned by planning.
6. Where is the “*quarantine area*” for “*contaminants*” and “*particularly malodorous waste*” coming onto site? This area is referred to but not shown on the WTS floor plan or site layout.
7. How often is “regular cleaning” of operational areas within the building, roads etc. A minimum interval (daily cleaning) should be stated, not just “as required” which is unenforceable.
8. Odour may be able to escape through the existing building envelope, even with the doors closed. The shed was designed and approved over 20 years ago to handle and transfer dry recyclables, not putrescible waste. The accompanying Planning Statement states that, “*No physical amendments or changes to the existing waste transfer station building will be required to accommodate the new waste stream*”. The capability of the existing building envelope to contain odours has not been proven.
9. The proposed waste stream and washing down could create liquid run-off. The “*sealed drainage system*” referred to (Planning Statement), and its outfall or collection point should be shown on the floorplan/site layout. We are concerned that contaminated run-off could reach the existing pond or watercourses which run under the holiday park and eventually to the East Strand (Skerries and Causeway Special Area of Conservation).
10. The containment and bunding of the building should be shown on the drawings.
11. Compliance with every aspect of a comprehensive Odour Management Plan (OMP) should be a planning condition of planning permission.

The Transport Assessment Form states that there will be no increase in vehicles visiting the site. However, currently this municipal waste stream goes permanently to landfill on site. Now it is proposed to take this waste away again, presumably to a “material recovery facility” elsewhere. Therefore, there will be “double handling” and a requirement for additional heavy good vehicles leaving the site loaded with mixed municipal waste. As stated before, this waste will pass the holiday park twice.

Should this proposal be approved, it should at the very least be time constrained. The Council envisage that a new WTS at Letterloan will make Craigahulliar WTS “surplus to requirements” (Environmental Services Committee, November 2024). An appropriate planning condition would stipulate that Craigahulliar WTS must close completely within 3 months of Letterloan WTS coming into operation.

In conclusion, we believe that there are significant omissions in the application submission. The proposed planning conditions are inadequate to ensure that this proposal will not create unacceptable adverse impact on sensitive receptors. The Council, if minded to approve this application, should give the suggested conditions above full consideration.

Yours sincerely,

David Dalzell CMLI MRTPI