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Richard Heaney
Causeway Coast and Glens Borough Council
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Our ref: 18-318/WTS/02

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 and c.5000 tonnes of food waste per annum was disposed of incorrectly via household black and blue bins. This building processes blue bin

waste but only 4.4% of blue bin waste is food waste, therefore we believe there is an increased 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"*
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There are a further 10 criteria but 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 blue bin 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. We welcome the proposed condition (Condition 9) requiring that, *"The operation of the site shall be carried out in accordance with the Odour Management Plan."* However,

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. It is proposed to take bring the waste to site and then take it away again (presumably to a "material recovery facility" elsewhere) so there will be double handling of black bin mixed municipal waste which will pass the holiday park twice.
3. Measures to prevent waste in transit creating odour should therefore be detailed and controlled by planning condition.
4. We welcome the proposed planning condition (Condition 10) requiring that roller doors are only to be opened to allow a vehicle to entry and exit the building.

5. The pedestrian access door should only be opened to allow personnel to enter and exit the building, and not just closed while waste is being moved about inside the WTS. Proposed planning Condition 11 states, *"The pedestrian access door shall remain closed at all times when waste is being moved within the building."*
6. Condition 11 should be reworded to state, **"The pedestrian access door shall only be opened to allow personnel to enter and exit the building and at no other times. It shall remain closed when waste is being moved within the building"**
7. No details of the odour suppression system have been provided. The planners should have sought details of the proposed odour suppression system before recommending that this development is approved. As a minimum, there should be a planning condition requiring, **"Details of the odour suppression system shall be submitted to the Council and approved in writing, in consultation with NIEA, prior to the commencement of the development hereby approved. The approved odour suppression system shall be installed prior to any mixed municipal wastes being delivered, stored or treated on site."**
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 containment and bunding of the building should be shown on the drawings.
10. 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).
11. There should be a planning condition requiring, **"The Waste Management Licence shall be updated to include all relevant waste codes and submitted to the Council and approved in writing, in consultation with NIEA, prior to any mixed municipal wastes being delivered, stored or treated on site."**

Should this application 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. The professional planning officer stops short of recommending a suitable planning condition, but states (section 2.10, Addendum 3), “... *it is the applicant’s intention that the purpose of any new transfer station at Letterloan is likely to recommend the consolidation and closure of Craigahulliar*”. We ask the Council to provide a firm commitment in this regard.

In conclusion, we believe that there are significant omissions in the application submission. The planning conditions as currently proposed are inadequate to ensure that this proposal will not create unacceptable adverse impact on sensitive receptors.

Yours sincerely,

David Dalzell CMLI MRTPI