



Michael Wilson
Planning Department
Causeway Coast & Glens Borough Council
Cloonavin
66 Portstewart Road
Coleraine
BT52 1EY

24th March 2025,

Dear Mr Wilson,

**PLANNING APPLICATION – CRAIGAHULLIAR WASTE TRANSFER STATION – RESPONSE TO DAVID DALZELL LETTER
24/03/2025**

Further to the objection received by David Dalzell on behalf of Blairs Caravans Ltd, please find below a response to each of the points raised.

Reference to a change to how the black bin waste will be managed

Reference is made to the black bin waste containing 22.5% food waste and by changing the disposal option from landfill to the waste transfer station will create an odour problem where it does not current existing. I totally disagree with this statement. The waste currently going to the landfill is black bin waste and therefore it will contain the same amount of food waste. However, when the black bin waste is disposed of in the landfill it will be placed here until it fully decomposes which can be 100's of years. During this time the decomposition of waste in the landfill will give rise to landfill gases and contaminated runoff which must be managed. Therefore, based on my 21 years' experience in the waste industry the operation of a landfill will present significantly greater odour risks than the operation of the waste transfer station.

Waste will be removed from the waste transfer station daily. This quick turn over of the waste will mitigate odours from arising.

Assessment of PPS11

The Supporting Statement submitted with the planning application included a detailed assessment of the proposal against all aspects of Policies WM1 and WM2 of PPS11. This assessment details how the black bin waste would be managed to mitigate the risk of odours, while identifying compliance with all aspects of Policies WM1 and WM2.

The waste transfer station has been in existence for ~20 years. The proposal is the addition of 1 waste stream. Mixed dry recyclables can also include food waste as contamination. In addition, mix dry recyclables can include odourous wastes such as milk bottles, and other jars, bottles and containers that can have food and drink residues on them. This is the reason why both mixed dry recyclables and black bin waste have the same European Waste Catalogue Code 20 03 01 (Mixed Municipal Waste). As identified in Mr Dalzell's objection, the site is operational and since 2018 the site has presented no major issues to the caravan park.

23 Bedford Street +44 (0) 28 9066 2121
BELFAST info @taggarts.uk
BT2 7EJ taggarts.uk



This demonstrates the ability of the Council to manage odorous wastes in both a landfill and Waste Transfer setting without causing an odour issue at the nearest receptors.

Comments on the Odour Management Plan

The location of the receptors is raised. However, it should be noted that all sensitive receptors are outside the site boundary. As identified, the site will be regulated by NIEA under a Waste Management Licence. This Waste Management Licence contains a condition which states that the operation is not permitted to have an odour outside the site boundary.

The waste transfer station is 170m away from the closest point of the caravan park, even its proposed future extension. The alternative option, as previously identified, is to develop Cell 6 of the landfill which will result in a more odorous waste management operation within ~100m of the proposed caravan park extension.

The Waste Transfer Station operation in terms of how vehicles will arrive at the site will not change from the current operation. All waste will be delivered and removed from the site in enclosed and covered vehicles.

When managing black bin waste all doors will be closed except when a vehicle is entering or leaving. This will also be a condition imposed by NIEA and the Waste Management Licence. It is therefore not required to be imposed by the Planning Approval.

The odour suppression system will be operated if the site manager completes their daily inspection and assesses a risk of odour outside the site boundary. This will be a condition of the Waste Management Licence and regulated by NIEA. Based on my 21 years of experience in the waste industry and the ~20 years evidence of the current waste transfer station operation I do not believe the odour suppression system will be required. However, this is a further mitigation measure to ensure the Council comply with the Waste Management Licence condition, ensuring no odour outside the site boundary.

The quarantine area is a section inside the shed separate from the main stockpile of waste. This separated area will be within the waste bay area identified on the current floor plan. The key principal is that this is separate from the rest of the material. This therefore does not need identified on the floor plan as waste storage areas are clearly identified.

The waste transfer station will be cleaned on a weekly basis. This will be done to ensure that the waste bay is clear of any black bin waste before the waste transfer station is used on the alternative week for the mixed dry recyclable wastes. As previously identified this will be on top of the endeavors to ensure that the black bin waste is removed from the waste transfer station by the end of each day.

23 Bedford Street +44 (0) 28 9066 2121
BELFAST info @taggarts.uk
BT2 7EJ taggarts.uk



I have developed the majority of Northern Ireland's waste transfer stations for Local Authorities. I have recently completed a black bin waste transfer station for another Northern Ireland Council, handed over in November 2024. This waste transfer station is of an identical design as the Craigahulliar facility including reinforced concrete walls, roller doors and steel cladding. The current Craigahulliar Waste Transfer Station therefore still meets modern design standards for these facilities.

I completed an inspection of the Craigahulliar waste transfer station prior to the submission of the planning application, and with Mr Dalzell and a representative of Blairs Caravan Park, on 4th February 2025. These site visits found the waste transfer station to be in very good condition.

As stated in the planning application there are no proposed changes to the drainage system. The waste transfer station is enclosed. The operations to clean the waste transfer station have not changed over the 20 years of operation. I am not aware of any incident of any runoff from inside the waste transfer station reaching the pond or any watercourse. As conditioned in the waste management licence no discharges are permitted from the waste transfer station. In addition, the surface water pond and any discharge to the water course are monitored by the Council on a month basis to demonstrate compliance.

We are content to have compliance with the Odour Management Plan conditioned as this will also be regulated and enforced by NIEA.

Transport Assessment From

The operational landfill took all the black bin waste from the full Council area as well as commercial customers. It is now proposed just to accept the black bin waste from the area around Craigahulliar Landfill. Other bin lorries will tip at other points in the Council area. No commercial customers will be accepted at the Waste Transfer Station. Therefore, there will be no increase in vehicle movements from what was permitted for the operation of the landfill. As no commercial customers will be accepted it is envisaged that vehicle movements will be significantly less than when the landfill was operational.

I trust the above provides further clarity as to how the black bin waste transferred through the current facility will be managed to prevent any odour or amenity issues outside the site boundary, let alone at any of the sensitive receptors

I trust the above is in order however if you have any queries please do not hesitate to contact me.

Yours sincerely,

23 Bedford Street +44 (0) 28 9066 2121
BELFAST info @taggarts.uk
BT2 7EJ taggarts.uk

Taggarts

Adrian Thompson

Technical Director

BSc (Hons) MSc CRWM MCIWM

23 Bedford Street

BELFAST

BT2 7EJ

+44 (0) 28 9066 2121

info @taggarts.uk

taggarts.uk