

Implementation Date: 01 September 2023

Template for Requesting Speaking Rights at the Planning Committee

The Protocol for the Operation of the Planning Committee provides for interested person(s) to register to speak on a planning application that is scheduled to be determined at the next meeting of the Planning Committee. This request must be received by the Planning Department no later than 10am on the Monday before the Planning Committee meeting via email account planning@causewaycoastandglens.gov.uk.

Planning Reference	LA01/2024/1187/F
Name	Adrian Thompson
Contact Details	Tel:
	Email:
Support or Objection – please tick relevant box	Support
BOX	Objection
Written representation summarising key points to be addressed and supplementary information in support of your case (minimum font size 10 and maximum length two sides of A4 page).	
This application is for the addition of 1 waste type to the already consented and operational waste transfer station at the Craigahulliar Landfilll Complex.	
The waste transfer station has been operational for over 20 years with no known amenity issues or complaints.	
The planning application to add black bin waste to the current waste transfer station on an alternative weekly basis is a small but critical piece of a larger environmental improvement plan.	
It is the Council intention to close the Craigahullair landfill early without the development of cell 6. The Council have full planning approval under C/1993/0600/F for the landfill, including cell 6.	
Cells 1 to 5 have now reached capacity. Therefore, the Council have 2 options: 1. Invest and develop Cell 6; or 2. Transfer the black bin waste through the existing waste transfer station then close and restore the landfill	
To ensure compliance with the Waste Hierarchy, the NWRWMG Waste Management Plan and the Waste (Circular Economy) (Amendment) Regulations (NI) 2020, the Council have agreed a strategy to close the landfill early and transfer the waste going forward to a private sector contractor who can extract further recyclates from the waste and convert any remaining waste to a fuel for energy recovery.	
The transfer of the black bin waste from the existing waste transfer station is therefore imperative to allow the closure of the landfill.	

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The benefits of this application are:

- It will allow the landfill to close, be sealed with a low permeability cap, and be restored
- It will mitigate risks of odour, litter and flies which can be operational risks of a landfill
- Waste placed in a landfill produces gases such as methane and carbon dioxide from its decomposition
 which can continue for periods up to and exceeding 60 years. Ceasing the operation of the landfill will
 therefore reduce the future greenhouse gas emissions associated with the Councils management of
 wastes.
- The alternative option to transferring the black bin waste through the waste transfer station is to develop cell 6 which will bring landfill operations closer to receptors. It is estimated that it would take a further 15 years to fill cell 6. The Council would also have to re-open the landfill to commercial customers to help cover the capital and operational costs of the new cell 6. This would increase the flow of HGV's along the road and past the caravan park.
- If the waste transfer station was to be granted permission to transfer black bin waste the following
 operational controls would be in place to prevent amenity risk:
 - o The black bin waste would only be accepted on an alternative weekly basis
 - o The waste would be tipped inside the enclosed shed to prevent amenity issues
 - The waste transfer station is 170m from the closest point of any future extension of the caravan park
 - o The waste would be loaded into HGV's and removed from site. The Council would endeavour to remove all black bin waste from the shed by the end of each working day and at worst within 48 hours. Therefore, waste will not sit for periods long enough to generate an odour outside the waste transfer station
 - The acceptance of black bin waste would only be for the limited bin lorries around the Portrush area. It is estimated that this would only be in the region of 8 bin lorries daily, Monday to Friday. The waste would be loaded into 2 to 3 bulk HGVs daily, Monday to Friday. This would equate to 10 to 11 HGV's per day. This would be a significant reduction in HGV movements when compared to the landfill operation.
 - The waste transfer station is currently operational under a Waste Management Licence issued and regulated by NIEA. The modification to this Waste Management Licence would be assessed and regulated by NIEA.
 - The Waste Management Licence for the site contains a compliance condition that states
 - "5.2.1 Measures shall be implemented and maintained throughout the operational life of the site to control odour and monitor emissions of odours from the site, in accordance with Table 5.2. 5.2.2 All emissions to air from specific waste management operations on the site shall be free from odours at levels as are likely to cause pollution of the environment or harm to human health or serious detriment to the amenity of the locality outside the site boundary, as perceived by an authorised officer of the Department"
- Both NIEA and Environmental Health were statutory consultees to the planning application. As part of this
 consultation they considered the Site Management Plan and the Odour Management Plan for the Waste
 Transfer Station. Neither NIEA, nor Environmental Health had an objection to the proposal.
- Further benefits will be delivered by the proposal. The application will support the Councils objective of zero waste direct to landfill. This will ensure compliance with new statutory targets which will require no more than 10% of waste sent to landfill by 2035.
- It will allow the waste that was previously disposed of in the landfill to go for further treatment at a private sector facility. This will allow further recycles to be extracted and the remainder sent for energy recovery.
- It ensures the Council waste will be managed in accordance with the Waste Hierarchy.
- The Council must have its own waste transfer stations to ensure it can issue competitive tenders for the future treatment of the waste. A lack of waste transfer provision would result in the reliance on 1 private sector operator in the Council area. The Council would therefore not be able to demonstrate value for money in any future procurement process.
- The lack of waste transfer provision from Craigahullair would result in bin lorries having to travel greater distances to tip. This would result in extra costs to the Council in terms of staff over time, fuel and wear and tear on the bin lorries. It would also result in more time traveling to tipping points which could affect the time spent collecting bins. This will increase operational costs to the Council as well as increase vehicle / carbon emissions associated with the bin collection service