

Laura Crawford

From:
Sent: 25 February 2025 09:35
To: Planning
Cc: Richard Heaney
Subject: Planning Application - LA01/2024/1187/F. Craigahulliar Landfill, Ballymacrea Road, Portrush
Attachments: RSK Report445240-02 (00)CraigahulliarWTS-OMP Review.pdf

Hi Planning,

We have requested speaking rights at tomorrow's Planning Committee meeting with regards this application. My client, Blairs Caravans Limited, had asked RSK to review the current planning application LA01/2024/1187/F, and particularly the Odour Management Plan submitted with the application. To date we have not submitted this RSK report formally through the planning application process at this time, although we have provided it to the Applicant's agent for their review.

As the RSK Report attached provides more detail on the issue of potential for odour from this proposed development, may I ask that you upload this to the planning portal so that the points raised by RSK may be taken into consideration. Thank you.

Regards,

David Dalzell CMLI MRTPI

Chartered Landscape Architect and Chartered Town Planner

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9th January 2025

Our Report ref: 445240-02(00)

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Independent Review of Odour Management Plan for Proposed Craighulliar Waste Transfer Station

Dear David,

Thank you for your instruction to carry out an independent review and critical appraisal of the odour management plan prepared by Taggarts on behalf of Causeway Coast and Glens Borough Council.

1. BACKGROUND

We understand that the existing Craighulliar Landfill Site is to be closed and that as a result, Causeway Coast and Glens Borough Council has lodged an application to allow for mixed municipal wastes (EWC Code 20 03 01) to be stored and transferred, in addition to the currently consented dry recyclables, at the existing Craighulliar Waste Transfer Station (WTS).

Mixed municipal wastes may be odorous therefore the consented scheme may have the potential for an adverse impact on amenity due to odour at existing sensitive receptors including residential properties and the existing and proposed expansion of the Craighulliar Holiday Park.

An Odour Management Plan (OMP) has been prepared by Taggarts on behalf of Causeway Coast and Glens Borough Council, and submitted to support the application. This report presents a review of the submitted OMP, issued at version 00, 'Final', dated October 2024.

2. REVIEW OF ODOUR MANAGEMENT PLAN

The OMP states that it has been prepared with reference to the requirements of Environment Agency (EA) Technical Guidance Note H4 – Odour Management. Annex 4 to EA H4 acknowledges that some facilities may present a higher risk of impacts than others and that the OMP should be proportionate to the risk, so that '*sites with a low odour potential will require comparatively simple and concise OMPs*' and the Introduction to the OMP

states '*Given the control measures in place it is considered that the facility will not have an odour impact outside the site boundary*' however there seems to be little evidence to justify this assertion. The OMP does not appear to include any odour impact or risk assessment, and no odour impact assessment appears to have been submitted in support of the application.

Retained Planning Policy PS11 set out the policy of the Department of the Environment for planning and waste management facilities. PPS 11 acknowledges that the planning and pollution control regimes are complimentary and that planning decisions should assume that the pollution control regime will be properly applied and enforced, but 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;*....

In the absence of an odour impact or risk assessment, it is not clear how the OMP demonstrates that adding what may be a substantial throughput of mixed municipal wastes, which may be more odorous than the current dry recyclables handled, is compatible with the existing land uses and will not have an adverse odour impact on existing sensitive receptors including residential properties and the Craighullier Holiday Park.

The Introduction to the OMP states that '*This Odour Management Plan (OMP) provides information on the potential impact of odours which may be emitted from the site, as well as the mitigation measures to be implemented to reduce the risk of odour release*' however no assessment of potential impacts appears to be presented, except for the assertion later in the introduction that '*Given the control measures in place it is considered that the facility will not have an odour impact outside the site boundary*'.

Reference is made to a '*contingency plan outlining corrective measures in the event of odour emissions and complaints or an odour release greater than 1.5 OUE/m³ outside the site boundary*' but it is not clear how the latter would be determined.

Section 1.1 on Scope identifies that the OMP was prepared with the requirements of Environment Agency Horizontal Technical Guidance Note H4 – Odour Management, and this is recognised as relevant and appropriate guidance, but it is not always clear that the OMP follows the recommendations of H4, for example limited description and no quantitative inventory of potentially odorous materials is provided, or that the OMP includes all the listed elements; little '*assessment of the risk of odour problems*' appears to be provided.

Section 1.2 presents a very brief description of the site and surroundings. Little detail of the existing WTS is provided, and the characterisation of site as '*mostly bounded by fields and grassland, with some residential dwellings*' is vague and appears to miss both the existing Craighullier Holiday Park, and the proposed extension, both of which are close to the boundary and represent a highly sensitive location, where a large number of members the public may be present for extended periods and may expect a high standard of amenity. A caravan park with a proposed extension, assumed to be the Craighullier Holiday Park is referred to in the introduction, so its omission from the only section on receptors is of concern. The section identifies that '*The closest dwelling to the proposed development boundary is approximately 200m to the north west of the WTS*

building' but it is not clear where the measurement is taken from, or to which property it is referring and no plan is provided. The cited distances to the caravan park and proposed extension referred to in the introduction seem unexpected and in the absence of a plan it is not clear that the receptors have been correctly identified.

The process description is cursory and does not include any detail on or inventory of the types of materials handled by the WTS under either the existing or proposed scenarios, or how these will be processed.

The assertion that the storage and transfer of waste in the WTS is likely to result in an improvement in 'the odour environment' does not seem to be supported by any evidence, and because that the WTS is closer to some receptors than the former landfill site, seems doubtful.

Section 2 deals with odour control during normal operation. Procedures for receipt of waste are briefly described incorporating good practice measures to minimise the potential for odour liberation including ensuring the materials accepted are appropriate, minimising storage times and good housekeeping and maintenance. The major emission control measures appear to be containment of the materials in the WTS building and roller doors which will be kept closed except to allow for the entry and exit of vehicles. An 'odour suppression system' is mentioned once near the beginning of the section, but no further detail is provided.

All buildings are permeable to some extent and the potential may exist for odorous emissions to escape through gaps in the building envelope. Waste management buildings are commonly fitted with air extraction systems to capture and treat odorous air before discharge, maintaining the building under slight 'negative pressure' to reduce the potential for fugitive emissions and to contribute to a safer working environment inside the building. Such systems may under some circumstances be considered the best available technique (BAT) but in the absence of information of the quantities of material to be handled, may or may not be disproportionate.

Section 3 sets out a regime of routine odour and meteorological monitoring. The odour monitoring would be based on 'sniff' testing', according to the protocol suggested in the H4 guidance, and this is considered good practice and appropriate, though it is important that the procedure should be documented and should control variables such as the operators' odour response (and potential 'desensitisation') as far as possible.

A number of reasonably foreseeable abnormal events which may lead to an increased risk of odour and (mainly housekeeping) actions to manage these are presented in Table 3.2, and are considered appropriate.

Section 4 considers roles and responsibilities and complaints handling, and these will be important in view of the reliance on good housekeeping measures to control potential odour impacts.

Section 5 commits to periodic and 'for cause' review of the OMP and this is considered good practice, although the proposed periodic review frequency of four years seems at odds with H4, which suggests annually, or if complaints or relevant changes are made to operations or infrastructure.

3. CONCLUSIONS

The odour management plan is based on appropriate guidance and includes good practice. OMPs should not be disproportionate to the risk of impacts, but there appear to be some significant omissions.



Little information is provided on the materials, their odour potential or quantities to be handled, and no odour impact assessment is presented. The identification of receptors seems questionable and appears to miss or give little consideration to several highly sensitive receptors.

Potential emissions and control measures are given limited consideration. Odour control relies heavily on good housekeeping and containment of odorous emissions by the building, without any extraction or treatment of air, with little evidence that these will be effective.

Overall it is not clear that the potential for a significant impact at nearby receptors such as the existing and proposed extension to the Craighulliar Holiday Park has been appropriately considered therefore it is not possible to be confident that it will be adequately controlled.

A robust odour assessment should be prepared in accordance with relevant guidance to provide a sound evidence base for a revised OMP so that confidence can be gained that the proposed development will not result in an adverse impact on existing users of surrounding land.

We hope you find the above of interest, however should you have any questions or wish to discuss anything at all, please do not hesitate to contact us.

Yours sincerely,

For RSK Environment Limited

Prepared by:

Reviewed by:

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Director, Air Quality