

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	David Dalzell, Colin Mayrs, Chris Parkhill
Contact Details	Tel: Email:
Support or Objection – please tick relevant box	Support <input type="checkbox"/> Objection <input checked="" type="checkbox"/>

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 putrescible matter, is going to be handled and that gives us concern. We believe there is a risk of an odour problem arising that presently doesn't 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 proposal must be scrutinised in detail at the planning application stage and 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) in addition to dry recyclables only (as currently) will not have a potential adverse impact or be compatible with surrounding land uses.

There has been an Odour Management Plan (OMP) dated October 2024 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*". It is not clear (there is no map in the report) showing where this dwelling is. Moreover, 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.
How waste is brought onto and off site should be explained, with measures to prevent waste in transit creating an odour detailed. 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).

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

2. 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).
3. While 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.
4. An odour suppression system is proposed, but no details have been provided. When will this system be activated and by whom? This should be detailed and conditioned by planning.
5. 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.
6. How often is "regular cleaning" of operational areas within the building, roads etc. A minimum interval should be stated, not just "as required" which is unenforceable.
7. 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.
8. The proposed waste stream 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.
9. The containment and bunding of the building (as required by NIEA) should be shown on the drawings.
10. Compliance with every aspect of a comprehensive Odour Management Plan (OMP) should be made 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.

In conclusion, we believe that there are significant omissions in the OMP submitted in support of this application, and the proposed planning conditions are inadequate to ensure that this proposal does not create unacceptable adverse impact on sensitive receptors.