



# Management System Summary

GXO UK Logistics Ltd.



*Helping clients prosper through compliance*

---

## SITE DETAILS

GXO UK Logistics Ltd  
Touchet Hall Road,  
Middleton,  
Manchester,  
M24 2YX

---

## OPERATOR DETAILS

GXO UK Logistics Ltd  
9 Haymarket Square,  
Edinburgh,  
Scotland,  
EH3 8RY

---

## PERMIT REFERENCE

EPR/LP3923MX

## DOCUMENT REFERENCE

K547.1~09~002

---

## ISSUE DATE

18/03/2026



**Wiser Environment Ltd**, Suite 11 Manor Mews, Bridge Street, St Ives, PE27 5UW  
94 Xuan Thuy, Thao Dien Ward, District 2, Ho Chi Minh City, 713385  
+44 1480 462 232 | [www.wiserenvironment.co.uk](http://www.wiserenvironment.co.uk) | [info@wisergroup.co.uk](mailto:info@wisergroup.co.uk)

## DOCUMENT CONTROL

<b>DOCUMENT TITLE:</b>	Management System Summary
<b>REFERENCE:</b>	K547.1~09~002
<b>CLIENT:</b>	GXO UK Logistics Ltd.
<b>REPORTED BY:</b>	Wiser Environment Limited
<b>STATUS:</b>	Final
<b>ISSUE:</b>	01
<b>ISSUE DATE:</b>	18/03/2026
<b>AUTHOR:</b>	Wiser Environment Limited
<b>APPROVED BY:</b>	GXO UK Logistics Ltd.

## REVISION HISTORY

REFERENCE	DATE	ISSUE:	REVISION SUMMARY
K547.1~09~002	05/02/2026	D1	For client review.
K547.1~09~002	18/03/2026	01	Finalised for submission.

## QUALITY CONTROL

ACTION	DATE	NAME
Prepared	28/11/2025	Hannah Davies
Checked	09/12/2025	Elliott Howard
Approved	18/03/2026	Elliott Howard

## CONTENTS

<b>1</b>	<b>INTRODUCTION .....</b>	<b>6</b>
<b>2</b>	<b>SCOPE OF MANAGEMENT SYSTEM .....</b>	<b>8</b>
<b>3</b>	<b>SITE INFRASTRUCTURE .....</b>	<b>10</b>
3.1	Construction Procedures & Supervision.....	10
3.2	Maintenance and Inspection .....	10
<b>4</b>	<b>PERMITTED ACTIVITIES.....</b>	<b>12</b>
<b>5</b>	<b>ANNUAL WASTE QUANTITIES .....</b>	<b>13</b>
<b>6</b>	<b>RECEPTION, HANDLING &amp; STORAGE OF WASTE.....</b>	<b>14</b>
6.1	Pre-Acceptance Procedure.....	14
6.2	Reception .....	14
6.3	Process Controls .....	15
6.4	Handling & Storage .....	15
6.5	Waste Dispatch .....	16
<b>7</b>	<b>TREATMENT PROCESS .....</b>	<b>18</b>
<b>8</b>	<b>SITE &amp; EQUIPMENT MAINTENANCE .....</b>	<b>19</b>
8.1	Site Operational Procedures.....	19
8.2	Training .....	19
8.3	Site Security .....	20
<b>9</b>	<b>ACCIDENT PREVENTION &amp; MANAGEMENT .....</b>	<b>21</b>
<b>10</b>	<b>WASTE MANAGEMENT .....</b>	<b>22</b>
<b>11</b>	<b>TRAINING &amp; COMPETENCE .....</b>	<b>23</b>
<b>12</b>	<b>COMPLAINTS .....</b>	<b>24</b>
12.1	Complaints Reporting .....	24
12.2	Community Engagement .....	24
<b>13</b>	<b>DOCUMENTS &amp; RECORDS .....</b>	<b>26</b>
<b>14</b>	<b>ENVIRONMENTAL MANAGEMENT .....</b>	<b>27</b>
14.1	Dust Control .....	27
14.2	Odour Control.....	27
14.3	Litter Control.....	27
14.4	Pests, Vermin, Birds .....	28
<b>15</b>	<b>EMISSIONS AND MONITORING .....</b>	<b>29</b>
<b>16</b>	<b>CLIMATE CHANGE .....</b>	<b>30</b>
<b>17</b>	<b>REVIEW THE MANAGEMENT SYSTEM .....</b>	<b>32</b>
<b>18</b>	<b>SITE CLOSURE .....</b>	<b>33</b>

## DRAWINGS

REFERENCE	TITLE	DATE
K547.1~20~001	Permit Boundary Plan	18/03/2026
K547.1~20~002	Site Setting Plan	18/03/2026
K547.1~20~003	Site Layout Plan	18/03/2026

## APPENDICES

APPENDIX	TITLE
Appendix A	Tote Washer Specification

## 1 INTRODUCTION

This document is the Management System Summary (MSS), as required by the associated Environment Agency guidance<sup>1</sup>. The MSS accompanies the application for a Bespoke Permit Application to permit a waste transfer site in on Touchet Hall Road, Middleton, Manchester, M24 2YX. The site is located at National Grid Reference SD 88847 07317.

The application has been prepared by Wiser Environment Limited on behalf of the applicant GXO UK Logistics Ltd. GXO UK Logistics Ltd are a logistics company providing services to, amongst others, the hospitality sector. To this end, as part of servicing these contracts, small amounts of waste are generated and returned to the depot where they are bulked before onward transfer to suitably permitted facilities.

The facility to be operated at Middleton is effectively a replacement for the site currently operated at Oceans Estate, Trafford Park Road, Trafford Park, Manchester, M17 1AS which operates on a combination of waste exemptions as well as an Environmental Permit (EPR/KB3305KZ). This new application will consolidate these activities into one permit at the new facility, prior to the formal surrender of the Oceans Estate permit.

The application will permit the following activities:

- Cardboard waste – bulked and baled prior to dispatch.
- Plastics – packaging and containers, bulked and baled prior to dispatch.
- Aluminium/metal tins, cans – sorted, bulked prior to dispatch.
- Glass – bulked prior to dispatch.
- Waste Oil – received in containers, bulked and palletised prior to dispatch.
- Food Waste – received in totes, bulked and stored within dedicated building prior to dispatch.

The site is located within a commercial area in the Middleton area of Greater Manchester and accessed via Touchet Hall Road. The centre of Manchester is located approximately 10 km SSW whilst the towns of Middleton and Oldham are 2 km south-west and 4.5 km south-east respectively. The nearest main road is the A627 located approximately 1 km east.

---

<sup>1</sup> [Develop a management system: environmental permits - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/develop-a-management-system-environmental-permits), updated 3 April 2023

The site location is shown on the Permit Boundary Plan (K547.1~20~001) in Section 7 of this application pack.

## 2 SCOPE OF MANAGEMENT SYSTEM

The facility to be operated at Middleton is effectively a replacement for the site currently operating at Oceans Estate, Trafford Park Road, Trafford Park, Manchester, M17 1AS, which operates on a combination of waste exemptions as well as an Environmental Permit (EPR/KB3305KZ). This new application will consolidate these activities into one permit at the new facility, prior to the formal surrender of the Oceans Estate permit.

The application will permit the following activities:

- Cardboard waste – bulked and baled prior to dispatch.
- Plastics – packaging and containers, bulked and baled prior to dispatch.
- Aluminium/metal tins, cans – sorted, bulked prior to dispatch.
- Glass – bulked prior to dispatch.
- Waste Oil – received in containers, bulked and palletised prior to dispatch.
- Food Waste – received in totes, bulked and stored within dedicated building prior to dispatch.

The scope of this Management System Summary (MSS) extends to all operations associated with the acceptance, handling, treatment and storage of waste at GXO Logistics UK Ltd. The wastes permitted to be accepted at the facility are detailed in Section 4 of this document.

The site is operated in accordance with management procedures and controls outlined within this MSS which has been produced in accordance with the Environment Agency (EA) guidance, '*Develop a Management System: environmental permits*<sup>2</sup>.

The benefits of operating an effective and efficient Management System are to ensure sustainable business practices, reduce risks and losses, reduce operational costs, to help obtain business and a good reputation, and to ensure legal compliance.

A controlled copy of the MSS will be available at Touchet Hall Road, Middleton, Manchester, M24 2YX.

GXO UK Logistics Ltd will ensure that copies of all relevant permits and approved supporting documents are provided to all personnel with nominated responsibility for the management or control of the site.

---

<sup>2</sup> [Develop a management system: environmental permits - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/develop-a-management-system-environmental-permits), updated 3 April 2023

The locations of the documents will be made known to all relevant personnel and will always be readily available for inspection by regulatory bodies when the site is operational.

### 3 SITE INFRASTRUCTURE

The site is located within a commercial area in the Middleton area of Greater Manchester and accessed via Touchet Hall Road. The centre of Manchester is located approximately 10 km SSW whilst the towns of Middleton and Oldham are 2 km south-west and 4.5 km south-east respectively. The nearest main road is the A627 located approximately 1 km east.

The site is approximately 1.35 ha, and includes two buildings, one in the south-east corner of the site to house conveyors/balers to process cardboard, plastics and waste oil (part of the wider warehouse complex) and another building for food waste storage. There will also be an area to unload vehicles of totes, skips for glass and tins/cans and outside storage areas for empty totes, pallets and kegs.

Site infrastructure comprises of the following:

- Metal sliding vehicle entrance gate with a rising barrier gate beyond this;
- Waste acceptance area;
- Steel frame building underlain by impermeable surface with balers and conveyors;
- Machine to wash totes which discharges into the foul sewer via a trade effluent consent;
- Food waste storage building will be constructed to the same specification as the current permitted site (Oceans Estate);
- CCTV cameras across the site, spill kits, fire extinguishers and first aid kits; and
- Office and amenities.

#### 3.1 Construction Procedures & Supervision

Any construction work, infrastructure improvement and replacement will be undertaken by a specialist contractor. A suitably qualified Civil and/or Structural Engineer will inspect works to ensure that all necessary standards and specifications are met.

#### 3.2 Maintenance and Inspection

Daily inspections of site infrastructure will be undertaken by the Technically Competent Manager (TCM) or a person appointed by the TCM. All defects will be reported and logged in the Site Diary and/or recorded electronically.

Daily site checks are undertaken to ensure that all structures are in good repair and recorded in the site diary or similar document. A comprehensive inspection of the concrete surfaces are undertaken monthly, repairs are organised where defects are found to maintain the integrity of the surface and prevent the transmission of fluids.

Hydraulic and lubricating oils, for use within mobile plant and machinery, will be stored in appropriate containers or removed by the service engineer. The container is provided with a spillage containment tray, to prevent the leakage from the container of any materials that might leak from any of the containers stored within it.

All containers stored within the site will be clearly marked with their contents and capacity. Container openings will be securely sealed before being moved around site to prevent spillages.

Spill kits are strategically placed within the site. Spill response kits shall be available during the transfer of all substances at the site.

The drainage system for the wheel washing and sealed surface water drainage around the site perimeter will be inspected daily to ensure this is free flowing. If found to be blocked immediate action will be taken to remove and dispose of the blockage.

## 4 PERMITTED ACTIVITIES

Permitted activities are restricted to bulking, baling and repackaging of non-hazardous household, commercial and industrial waste to be transferred elsewhere for recovery. The permitted activities will take place on an impermeable surface.

The activities onsite consist of bulking and baling wastes such as cardboard and plastics. Soft and hard plastics are processed in separate bailers. The baled cardboard and plastic is stored within a two-curtain sided trailer whilst they await dispatch from site.

Aluminium metal tins and cans are received in totes, sorted and bulked in a 40yrd skip. Food waste is packed in biodegradable bags within "totes" (small black plastic boxes), moved into dolavs then emptied into trailers, before being stored within a dedicated building prior to dispatch. Glass is also received in totes (yellow top to differentiate from food waste) and this is stored in a RoRo skip prior to dispatch from site.

Waste oil is received in containers, palletised and wrapped prior to dispatch. This is stored in a two-curtain side trailer whilst awaiting dispatch and if there is a shortage in supply of trailers, a maximum of 11 pallets of waste oil can be stored onsite.

All storage areas are indicated on the Site Layout Plan, K547.1~20~003.

Only non-hazardous waste is accepted onsite.

Wastes to be accepted are shown in the List of Waste (K547.1~09~007).

Permitted activity codes for the waste transfer activities are listed below:

- R13: Storage of waste pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where the waste is produced).
- R12: Exchange of waste for submission to any of the operations numbered R1 to R. Including preliminary operations prior to recovery including bulking, baling and repackaging.

## 5 ANNUAL WASTE QUANTITIES

Activities onsite have a capacity of 15,000 tonnes per annum. The addition of glass waste (EWC: 20 01 02) will not require an increase in overall site tonnage from the original activities undertaken at Oceans Estate.

## 6 RECEPTION, HANDLING & STORAGE OF WASTE

The following section describes the operational techniques that are implemented on site to control the release of any potentially polluting substances to the environment during reception, handling and storage of the waste.

All operations and working practices are regularly reviewed and improved where necessary. There are robust mechanisms in place for investigation of incidents/accidents if they occur.

### 6.1 Pre-Acceptance Procedure

GXO UK Logistics Ltd accepts non-hazardous waste at the Middleton site from within the UK, consisting of non-hazardous waste from commercial premises as part of facilitating Greene King contracts. The types of wastes to be accepted onsite are detailed in Section 4 of this report.

A pre-acceptance procedure is followed in accordance with SGN S5.06<sup>3</sup> section 2.1.1.

The waste producer is asked to confirm the type of process where the waste is produced, the expected quantity of waste, and hazards associated with the waste before the waste is accepted onsite. The information is allocated a unique reference code and retained as a record for a minimum of 3 years.

Waste is delivered to site within biodegradable totes (tins/cans, food & glass) or metal cages (cardboard and plastic) which are unloaded in the waste acceptance area. The totes will be washed onsite, using dedicated machinery before being reloaded onto trailers and dispatched from site. Further information on this is included in Section 7.

### 6.2 Reception

On arrival, vehicle details will be recorded in the site's waste tracking system. Waste will only be accepted from companies who have provided a valid waste carrier registration and relevant Waste Transfer Note.

All loads will be pre-booked from known sources (Greene King contractors), therefore the prospect of any non-conforming waste is limited. No ad-hoc deliveries will be accepted.

All loads are inspected on arrival for non-permitted wastes, quality, and conformance with Environmental Permit requirements. Non-conforming loads are refused entry at the collection

---

<sup>3</sup> [Sector Guidance Note S5.06: recovery and disposal of hazardous and non-hazardous waste - GOV.UK \(www.gov.uk\)](http://www.gov.uk), updated 10 October 2018

point and details are recorded on the waste transfer note. All staff collecting and receiving waste are fully trained in identifying non-conforming materials at the collection point. All accepted waste is then directed to the waste reception area before loads are discharged in the designated area.

All drivers must be wearing appropriate Personal Protective Equipment (PPE) before beginning the unloading process.

The site is operated in accordance with written procedures incorporated within the GXO UK Logistics Ltd. Management System. All procedures include written instruction on how to undertake tasks, equipment involved, PPE/safety equipment required and potential hazards. Each procedure is accompanied by an activity risk assessment.

### **6.3 Process Controls**

- Always wear the correct PPE provided by the Company. Report any wear and tear so that it might be replaced.
- Drive around the site in accordance with site driving rules.
- Only trained operators may operate machinery in accordance with operational procedures.
- Beware of your own area and others who may enter it.
- Engage positively with these rules and if unsure contact your Line Manager.

### **6.4 Handling & Storage**

The site is equipped with various mobile plant. All equipment is periodically inspected in accordance with manufacturers' guidance and manuals to ensure the plant and equipment is available for work when required.

Any non-conforming waste types, other than those listed in the List of Waste in Section 4 of this report will be rejected upon visual identification. Rejected wastes will be quarantined and the customer will be informed (usually via telephone/email), and arrangements will be made to remove these items from site within 72 hours.

A record is kept of all waste received at, or rejected from, the site. A waste tracking system is utilised to document and manage waste transfer notes and number of totes collected (and whether ¼ full, ½ full against the relevant EWC code). GXO UK Logistics Ltd. drivers operate a Microlise system and record waste streams received on a handheld device. These records contain:

- Date & time of arrival to ensure first in first, out principle can be followed;

- Waste Transfer Note;
- Producers' details;
- Previous holders;
- A unique reference number;
- Intended treatment/recovery route;
- Accurate nature and quantity of waste, including hazards; and
- Storage location.

All records are maintained for a minimum of 3 years following recovery or disposal.

At the initial waste acceptance area (see Site Layout Plan (K547.1~20~004), totes will be unloaded and the contents separated into dolav containers before it is tipped into dedicated storage areas.. In the case of tins/cans and glass, the dolavs are emptied into 40-yard skips. Food waste is stored within the totes in sealed, biodegradable, food-grade bags which are emptied into dolavs before being emptied into trailers within the dedicated food waste storage building. Empty totes are washed using the dedicated plant before storage in empties area prior to redistribution to pubs.

Cardboard, plastics and waste oil are taken to a further waste processing area where they are unloaded onto conveyors prior to sorting and baling. These bales are then stored within two curtain side trailers whilst awaiting dispatch from site.

Waste oil is loaded onto pallets, wrapped and stored on two curtain side trailers prior to dispatch. If for any unforeseen circumstance the supply of trailers is not sufficient for the waste, a maximum of 11 pallets of waste oil and 15-20 pallets of baled cardboard and plastic can be stored onsite.

Given the limited quantities of waste accepted, any feedstock is usually processed the same day and shall be stored within two curtain side trailers prior to dispatch. Currently, dispatch of waste is undertaken between two or three times per week (see Section 6.5), meaning that timeframes waste is stored is minimised. No food waste will be stored onsite longer than 4 days under normal operating conditions.

## **6.5 Waste Dispatch**

Any waste leaving the site will be accompanied by a written description, and due diligence checks will ensure that they are transferred to a suitably permitted waste management facility, by a registered waste carrier.

Waste oil, cardboard and plastic bales and glass/metals are collected twice a week. Food waste is collected 3 times a week. All totes will be washed before leaving the site in curtain sider lorries.

## 7 TREATMENT PROCESS

The only 'processing' of waste onsite is the baling of cardboard and plastics prior to dispatch. No treatment beyond this is undertaken on site to any of the other accepted waste streams.

All waste is stored and processed on an impermeable surface with a sealed drainage system.

Site does undertake some washing of containers (totes) in which food wastes and other streams are received. This is undertaken by dedicated plant (specification in Appendix A), which recirculates water used before eventual discharge to a foul sewer connection under a trade effluent consent. The same consent covers the discharge from vehicle washing which is undertaken in a purpose-built bay with dedicated drainage system. Vehicle washing is undertaken outside of the permitted area.

## 8 SITE & EQUIPMENT MAINTENANCE

The site contains mobile plant e.g. Manual Handling Equipment, a counterbalance truck and a hand pallet truck for unloading waste. The site also contains fixed equipment such as a conveyor and washing plant for the totes.

All equipment is periodically inspected in accordance with manufacturer's guidance and manuals to ensure the plant and equipment is available for work when required. The forklift is inspected and tested by an external auditor on an annual basis. The MEWP is inspected and tested by an external auditor on a 6-month basis. Electronic and/or paper copies of the audits are kept onsite.

Weighing equipment is inspected and tested on annual basis by an external auditor in accordance with the Weight and Measures Act 1985.

The site is operated in accordance with written procedures incorporated within the GXO UK Logistics Ltd. management system.

All procedures include written instruction on how to undertake tasks, equipment involved, PPE/safety equipment required and potential hazards. Each procedure is accompanied by an activity risk assessment.

The site manager also maintains a register of all calibrations of measuring and monitoring devices. All calibrations are undertaken by an approved subcontractor.

### 8.1 Site Operational Procedures

The site is operated in accordance with a number of written procedures incorporated within the GXO UK Logistics Ltd Company Management System.

All procedures include written instruction on how to undertake tasks, equipment involved, PPE/safety equipment required and potential hazards. Each procedure is accompanied by an activity risk assessment.

### 8.2 Training

It is the responsibility of Senior Management and the Site Manager to ensure that no unauthorised persons operate equipment on site.

Operation of the equipment is carried out exclusively by staff that are fully trained in safe working practices and the safety features of the equipment.

Individual operators have access to the operation and maintenance manuals of the equipment they use.

### **8.3 Site Security**

The site is enclosed with a palisade security fence around the perimeter and secure card entrance gates which provide the only vehicle access route onto site. The vehicle entrance is also gated with a rising barrier and has CCTV which is monitored 365/24/7. The site has further secure gates and doors both internal and external and access is via an access card.

Internal security audits are conducted on an annual basis. There are procedures in place for reporting security incidents, and the security system identified any breaches and raises an alarm to onsite security staff.

## 9 ACCIDENT PREVENTION & MANAGEMENT

The GXO UK Logistics Ltd Risk Assessment for the Middleton site identifies the foreseeable risks on site and provides details on how risks will be controlled.

Potential accidents and incidents have also been identified within Table ERA13 of the Environmental Risk Assessment (ERA) (K547.1~09~004), where management procedures and controls are identified to reduce any identified risk.

Control measures detailed within the ERA include:

- Site is secured by fencing, gated and CCTV is monitored externally 365/24/7;
- All vehicles delivering waste will be trained and record details of the waste using the internal GXO Logistics UK Ltd. system;
- Waste deliveries and site operations shall be overseen by the Technically Competent Manager or nominated competent person;
- Unloading of waste will only be undertaken in designated areas;
- Waste storage and processing activities will be undertaken on an impermeable surface with sealed drainage;
- Appropriate training regarding process/plant operation and emergency procedures is provided to all relevant staff;
- Plant and equipment will be maintained in accordance with their maintenance schedules or when applicable;
- Storage tanks are checked as part of daily site inspections for integrity or signs of leakage;
- Fuelling of plant is to be undertaken on an impermeable surface with a suitable spill kit and fire extinguisher available; and
- Surface water is actively managed on site to prevent flooding.

Accident prevention and management will be reviewed on an annual basis along with the Management System or following an accident.

## 10 WASTE MANAGEMENT

The site produces limited quantities of non-recoverable waste streams which are not forwarded to further re-processors. Those residual wastes are managed through contract with a waste management company.

Waste oil, cardboard and plastic will be stored in two curtain side trailers awaiting disposal from site and are collected twice a week from site. Waste glass and metal are also collected from site twice a week and stored within dedicated containers.

Food waste is stored in a dedicated building and collected 3 times a week from site and stored in dedicated trailers.

## 11 TRAINING & COMPETENCE

The site shall be overseen and managed by a Technically Competent Manager (TCM) holding the relevant Operator Competence Certificate qualification. The Site Manager will be responsible for the day-to-day operations at the site, and to ensure that site personnel operate the site in compliance with the Environmental Permit. They will be responsible for ensuring adequate training of staff has been undertaken.

The TCM will report any problem, or potential problem, to Senior Management as well as the Environment Agency.

The TCM will attend site in accordance with the attendance criteria specified within the Environment Agency guidance, *'Legal operator and competence requirements: environmental permits'*<sup>4</sup>.

All new site staff are taken through an induction process, covering all areas of site operations, including company policies, operational and emergency procedures, risk assessments, site rules, and all relevant conditions of the Environmental Permit.

It is the responsibility of Senior Management and the Site Manager to ensure that no unauthorised persons operate plant and equipment on site.

Operation of the equipment is carried out exclusively by operators fully trained in safe working practices and safety features of the equipment.

Individual operators have access to operation and maintenance manuals of the equipment they use.

Staff training is reviewed regularly through refresher courses, to ensure continued competence in their daily tasks.

---

<sup>4</sup> [Legal operator and competence requirements: environmental permits - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/legal-operator-and-competence-requirements-environmental-permits), updated 11 June 2019

## 12 COMPLAINTS

All complaints received concerning the permitted site will be dealt with in accordance with the existing complaints procedure in the Management System. Those relating to odour will be treated in accordance with the procedure detailed in the Odour Management Plan (K547.1~09~006).

The Technically Competent Manager (TCM) is responsible for responding to complaints and implementing the complaints procedure. All complaints will be investigated within 24 hours upon receipt.

Upon receipt of a complaint, either directly from a neighbouring resident or indirectly via the Regulator. The following information will be requested from the complainant:

- Name;
- Address;
- Contact details;
- Date(s) and time(s) to which the complaint relates; and
- Nature of the complaint and any other details which may assist in the identification of the source, activity or circumstances which prompted the complaint.

The timings and description of the complaint will be analysed in conjunction with the activities and meteorological conditions logged on site without delay to identify the odour source. The complainant may be asked to keep ongoing log for correlation with the site operational log. Once the source or activity is identified suitable mitigation measures will be implemented without delay to prevent odour emissions.

The details of the complaint and any subsequent investigation will be recorded in GXO Logistics UK Ltd. internal system, or other format recording relevant information.

### 12.1 Complaints Reporting

Records relating to management review, complaints, internal audits and inspections are held for a minimum of six years.

All complaints will be acknowledged and investigated by the TCM, or nominated person, with resultant actions reported to the complainant and the EA.

### 12.2 Community Engagement

On receipt of a complaint, the TCM, or nominated person, will investigate the complaint to swiftly rectify the source.

Where contact details are made available, the complainant will be contacted within 24 hours to check that the mitigation measures rectify the issue.

Where additional time is required to undertake repair or replacement of infrastructure which has caused the complaint, the complainant will be contacted with details on the actions being taken and the estimated timescale for completion.

## 13 DOCUMENTS & RECORDS

As a minimum, the following records must be kept ensuring compliance with the requirements of the Environmental Permit:

- A copy of the site permit;
- Site management plans;
- Operational procedures;
- Site and activity risk assessments;
- Competence and training records;
- Compliance records; and
- Duty of Care documentation and Environment Agency (EA) waste returns.

Records must be retained for 6 years; unless they relate to off-site environmental or health effects, or the condition of the land or groundwater when they shall be retained until permit surrender.

Copies of all relevant Environmental Permits, access to the Management System, and any other codes of practice will be available at the site office, with electronic back-ups.

Records of all waste received at, and removed from, the site will be maintained on site and reported to the EA on a quarterly basis.

Records will be kept in accordance with The Waste (England and Wales) Regulations 2011 (as amended) and the conditions of the Environmental Permit.

## 14 ENVIRONMENTAL MANAGEMENT

### 14.1 Dust Control

Initial Risk: Medium

Residual Risk: Low

Site has limited potential to create dust emissions given the wastes accepted, methods of storage and storage durations.

All waste is stored in skips or containers which can be securely closed. None of the wastes accepted would be classified as dust. All treatment operations (baling) are undertaken internally.

Full list of control measures are listed within the Environmental Risk Assessment, Table ERA8 (K547.1~09~004 ERA).

### 14.2 Odour Control

Initial Risk: Medium

Residual Risk: Low

Food waste accepted has potential for odour but this is managed through an Odour Management Plan and the Environmental Risk Assessment (K547.1~09~006; 004). Food waste is stored within containers on receipt and unloaded into dolavs prior to deposit in dedicated enclosed trailers. These are stored within a food waste building, preventing escape of potential fugitive emissions.

For full list of control measures see the OMP and ERA (K547.1~09~006; 004).

### 14.3 Litter Control

Initial Risk: Medium

Residual Risk: Low

Where litter is generated, the following measures are employed.

The site is subject to regular housekeeping to suppress litter generation, staff are required to litter pick on a 'see it, pick it up' basis.

Where litter is identified as a nuisance on the site boundary, the TCM and management will immediately organise the collection of litter by staff. Priority will be given to eliminating the

source, following which off-site areas and the site boundary will be cleared. The source of the litter will be investigated and removed to a container ready for disposal.

See full controls in ERA (K547.1~09~004).

#### **14.4 Pests, Vermin, Birds**

Initial Risk: Medium

Residual Risk: Low

All reasonable measures will be taken to prevent and minimise the occurrence of pests. Daily site inspections and good housekeeping procedures will be maintained in order to reduce any occurrence and allow appropriate measures to be taken where necessary.

If an increase in a pest population is observed, the source will be investigated in order to undertake the most effective mitigation measures.

See full list of controls in ERA (K547.1~09~004).

## 15 EMISSIONS AND MONITORING

There are no emission limits or monitoring requirements specified on the current permit for the Oceans Estate site (EPR/KB3305KZ). As the proposed new site, Middleton will be the same site operations, with no emission points. The discharge of foul water is governed by a Trade Effluent Consent outside of the Environmental Permit.

Appropriate measures have been taken to control emissions of substances not controlled by emissions limits.

A dedicated Odour Management Plan in support of an Environmental Risk Assessment manages potential risk from odourous wastes.

## 16 CLIMATE CHANGE

Climate change may increase risk of uncontrolled emissions or smoke and fire water; increase in waste reactions or fires involving heat sensitive or combustible waste; and increase in high temperature expansion and stress of plant, pipework and fittings. There is also a risk if UV degradation of plastic pipes and hoses causing them to fail; increased dust emissions from processing areas (risk of reduced water availability for dust suppression); and potential increased risk of wildfires impacting the site.

Potential effects from climate change have been identified within Table ERA15 of the Environmental Risk Assessment (ERA) (K547.1~09~004), where management procedures and controls are identified to reduce identified risk.

Control measures detailed within the ERA include:

### 15.1 Temperatures

Temperature fluctuations are unlikely to significantly impact waste streams onsite given the limited stock, waste being containerised and that material processed is stored for limited periods. If waste streams change then any risk shall be re-assessed.

#### 15.1.1 Summer

The potential for fire if the temperature exceeds the heat rating for the wastes stored, the potential for UV degradation, waste reactions, increased dust emissions, drought, wildfires and risk of pests and scavengers have all been considered, along with the quick turnaround times of the wastes stored onsite.

The appropriate mitigations can be found in the Fire Prevention Plan (K547.1~09~003), and the Environmental Risk Assessment (K547.1~09~004).

#### 15.1.2 Winter

Potential impacts of warmer winter temperatures have been considered; potential for increased odour and pest infestations is limited given types of waste accepted onto site. Logistical issues potentially caused by extreme cold temperatures shall be managed through accurate calculations of material input and output, associated logistics to ensure a steady supply of feedstock and deliveries. On site surfaces, salt and grit shall be utilised to reduce potential for skidding and accidents.

## **15.2 Rising Sea Levels**

Potential impacts of rising sea levels are negligible given the site's location – site is located within a Flood Zone 1 area and therefore has a very low risk of flooding.

## **15.3 Changes in Rainfall Patterns and Intensity**

Stockpiled material is limited on site, the majority containerised with all processing (baling) undertaken internally. Wastes are subject to limited storage times and this limits the potential impact of more intense rainfall and any potential flooding or washout of site.

## **15.4 Heat Waves**

Long periods of hot weather have been considered, and potential risks with dust are managed through storage of waste within containers. Processing of waste (baling) is undertaken within a building therefore potential for fugitive dust emissions and impacts from heat are limited.

Other potential impacts have been considered within the Environmental Risk Assessment and the Fire Prevention Plan (K547.1~09~004; 002).

## **15.5 Storms**

The potential for high winds causing damage to buildings, infrastructure and plants will be mitigated by regularly surveying of the sites infrastructure quality and keeping up-to-date with all EA and Government weather reports (Environmental Risk Assessment – K547.1~09~004).

## 17 REVIEW THE MANAGEMENT SYSTEM

The Management System Summary will be reviewed in its entirety at least annually or following any substantial change in site operations.

Other activities which may prompt review of the Management System are variations to the environmental permit, accident, complaint, breach or a change in the site setting or sensitive receptors.

Where the review results in required changes, this will be documented and maintained with the site records, for example, changes to environmental management measures, new or altered equipment.

## 18 SITE CLOSURE

Following completion of restoration works on site, GXO UK Logistics Ltd will plan for the closure of the site through maintaining records of waste inputs, site development and maintenance. Following any pollution incidents, records of actions taken, any remedial works, and verification reports undertaken shall be kept, as well as any monitoring results.

To evidence that the site operation has not caused a detrimental impact to the surrounding environment, the information collated during the lifetime of the permit will be utilised to prepare the permit surrender.



*Helping clients prosper through compliance*

Suite 11 Manor Mews, Bridge Street, St Ives, PE27 5UW  
01480 462 232 | [www.wiserenvironment.co.uk](http://www.wiserenvironment.co.uk) | [info@wisergroup.co.uk](mailto:info@wisergroup.co.uk)

