



Odour Management Plan

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

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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 | info@wisergroup.co.uk

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Checked	05/02/2026	Andrea Petrolati
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1. INTRODUCTION

This document is the Odour Management Plan (OMP) that accompanies the application for a bespoke environmental permit at the site located 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 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.

This OMP identifies potential odour issues and proposes mitigating measures that can reduce adverse impacts. The OMP should be read by the Technically Competent Manager (TCM), site staff, contractors working on site, and the Environment Agency (EA).

2. SITE LOCATION AND INFRASTRUCTURE

2.1. Site Description

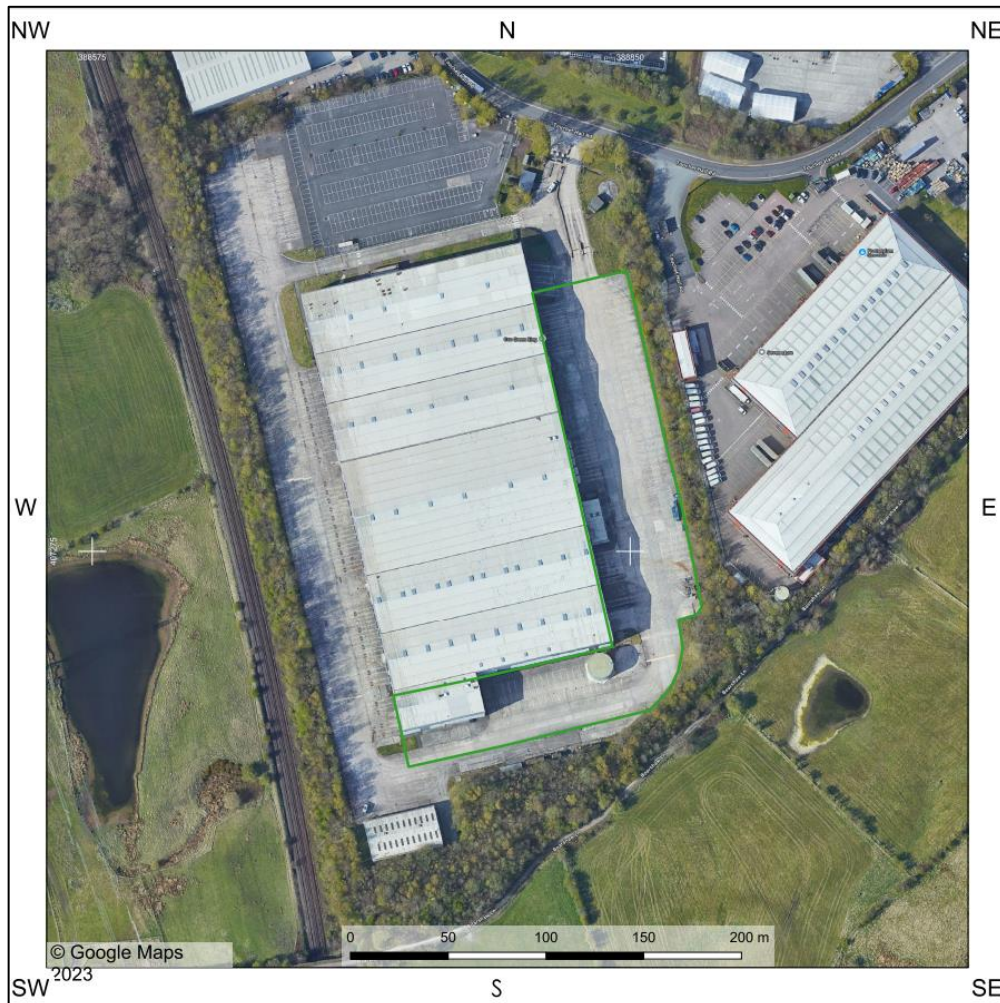


Figure 1 Aerial image of the site, showing the permit boundary in green.

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.

Infrastructure on site include:

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; office and amenities.

All waste will be stored and processed on impermeable surfacing with sealed drainage system.

2.2. Maintenance & Review of the OMP

The TCM is responsible for the OMP and ensuring people are trained. The plan is stored in the site office. The OMP will be reviewed annually or following a substantiated odour complaint.

All personnel shall be trained in the procedures for which they are responsible, including any reporting and contingency procedures. Records of all training shall be maintained and reviewed in accordance with GXO Logistic's written Management System.

All staff or contractors working on site must not undertake any work for which they are not competent – except under the careful instruction and supervision of a competent person.

Site specific inductions must include relevant aspects of the health and safety, environmental and quality policies, documentation, risk assessments, and emergency procedures. Further training will be provided if skills decline when not used regularly, and refresher training will be provided as necessary to ensure continued competence. Information from personal performance, health and safety monitoring, accident investigation and near-miss incidents are to be used to identify any gaps in skills and competence.

2.3. Relevant Sector Guidance

This OMP has been produced in accordance with the following guidance:

- H4 Odour Management¹; and
- Control and monitor emissions for your Environmental Permit²

¹ [Environmental permitting: H4 odour management - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/environmental-permitting-h4-odour-management), published 4 April 2011

² Control and monitor emissions for your environmental permit - GOV.UK (www.gov.uk), updated 11 June 2025

3. RECEPTORS

3.1. Receptor List

A receptor is the object (e.g., person, organism, resource, or property) impacted by a hazard. For example, odour may cause offence to a human (the receptor). When identifying receptors which may be at risk from the site, the following have been considered:

- Ancient woods
- Locations used to grow food or to farm animals or fish
- Drain and sewer systems
- Factories and other businesses
- Fields and allotments used to grow food
- Footpaths
- Roads and railways
- Groundwater beneath the site
- Homes, or groups of homes
- Playing fields and playgrounds
- Private drinking water supplies
- Regionally important geological sites
- Schools, hospitals, and other public buildings
- Water
- Conservation areas, habitats, and protected areas and areas of scientific interest

Sensitive receptors within 1 km of the permit boundary are shown on the Site Setting Plan. The IDs on the Sensitive Receptor Plan correspond to the Receptor List (Table 1) below.

Table 1 Sensitive Receptor List (1 km)

RECEPTOR TYPE	ID	DESCRIPTION	DISTANC E	DIRECTIO N
HUMANS AND PROPERTY	-	Site Workers	On site	-
	-	Site Visitors	On site	-
	INHABITANTS OF RESIDENTIAL PROPERTIES			
	1	Chadderton Fold Residential Area	155 m	SE
	2	Boarshaw Road Residential Areas	300 m	WSW
	3	Whitegates Road Residential Areas	585 m	NW
	4	St Bridge Road Residential Area	720 m	ESE
	5	Stanycliffe Lane Residential Area	815 m	WNW
	6	Slattock's Link	820 m	NNE
7	Hollin Lane Residential Areas	880 m	W	

RECEPTOR TYPE	ID	DESCRIPTION	DISTANCE	DIRECTION
	8	Chadderton Park Road Residential Area	915 m	SE
SENSITIVE PUBLIC USE				
	1	Middleton Cemetery	425 m	SW
	2	Soccer Stars Academy Middleton	705 m	WNW
	3	Boarshaw Children's Centre	750 m	WSW
	4	St John Fisher RC Primary School	890 m	WNW
	5	Chadderton Park FC	960 m	SE
COMMERCIAL USE				
	1	GXO Green King Commercial Area	0 m	NNW
	2	Boarshaw Lane Commercial Area	20 m	NE
	3	Touchet Hall Road Commercial Area	65 m	N
	4	Finland Road Commercial Area	395 m	N
	5	Bentley Avenue Commercial Area	715 m	NNE
	6	Three Pits Stables	775 m	NNW
	7	Hilltop Farm and Riding School	915 m	ESE
	8	Oldham Road Commercial Area	935 m	S
	9	Boarshaw Road Commercial Area	1.0 km	WSW
RECREATIONAL AREAS				
	1	Boarshaw Clough Nature Reserve	820 m	W
	2	Manchester golf club	840 m	NW
	3	Chadderton Hall Park	1.00 km	SE
ROADS AND RAILWAYS				
	1	A664	820 m	WNW
	2	A627 (M)	985 m	ENE
PUBLIC RIGHTS OF WAY				
	1	Footpath between Rochdale Canal and Oozewood Road	25 m	SE
	2	Footpath between Chadderton Fold and Oldham Road	100 m	SE
	3	Footpath between Touchet Hall Road and Stakehill Lane	135 m	N
	4	Footpath running alongside the Rochdale Canal	285 m	W
	5	Footpath between Boarshaw Lane and Eastern Agricultural Areas	500 m	ENE
	6	Footpath connecting Rochdale Road	580 m	NNW
	7	Public Footpath near Haigh Lane	775 m	S
	8	Footpath between Green Lane and Myrtle Road	795 m	SW
	9	Footpath between St Bridge Road Residential Area and Church Avenue	815 m	NE
	10	Footpath between Don Street and Hilton Fold Lane	845 m	SW

RECEPTOR TYPE	ID	DESCRIPTION	DISTANC E	DIRECTIO N
	11	Footpath next to Stakehill Nurseries	860 m	NE
	12	Footpath between Rochdale Road and Hollin Lane	865 m	NW
	13	Footpath connecting Rochdale Road and Oaken Bank Road	890 m	NNW
	14	Footpath connecting Pennine Edge Wood to Rochdale Road	1.00 km	NW
	15	Footpath between Healds Green and Heights Lane	1.00 km	ESE
WATER	SURFACE WATER			
	1	Rochdale Canal	320 m	NW
	2	Whit Brook	630 m	NW
	GROUNDWATER			
	1	Secondary Superficial Aquifer	On slte	-
ENVIRONM- ENTALLY SENSITIVE SITES	DESIGNATED SITES			
	1	SSSI- Rochdale Canal	355 m	W
	2	Local Nature Reserve Running through Pennine Edge Wood	1.00 km	NW
	3	Local Nature Reserve in Manchester Golf Club	1.00 km	NNW
	NON-STATUTORY DESIGNATED SITES			
	1	Historic Parkland on Manchester Golf Club	900 m	NNW
HERITAGE SITES	LISTED BUILDINGS, PARKS & SCHEDULED MONUMNETS			
	1	Rochdale Canal Lock Number 58 and adjoining bridge (Grade 2 listed building)	620 m	NNW
	2	4 grade 2 listed buildings near Limefield Livery Stables (Grade 2 listed buildings)	625 m	S

3.1. Prevailing Wind Direction

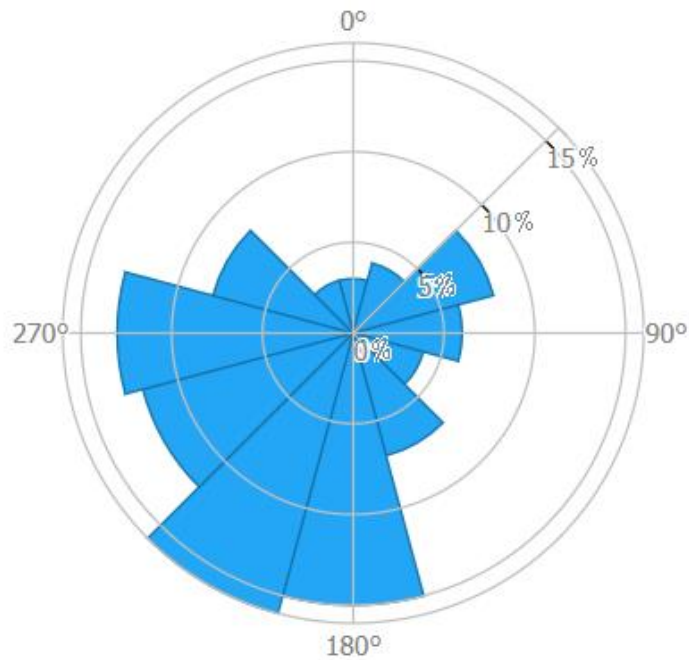


Figure 2 Global Wind Atlas wind rose. ([Global Wind Atlas](#)).

The closest observing station where wind statistic data is available is at *Middleton, Rochdale, Greater Manchester, England, M24 1HB, United Kingdom*, approximately 3.5 km southwest of the permit boundary. Figure 2 presents the wind statistics on a wind rose as an average using data of the wind directions. The wind rose indicates that the sensitive receptors located towards the North-East of the site are potentially at greatest risk from hazards transmitted through the air.

4. OPERATIONS

Site shall operate as a waste transfer station, receiving small quantities of waste from facilitating contracts with Greene King. Primarily, these wastes will relate to cardboard and plastic packaging, aluminium and metal cans/tins, glass, waste oil and food waste (non-hazardous kitchen waste, edible oil and fat). A full list of waste is included as part of the submission (LoW, K547.1~09~007).

Wastes are stored within containers, internally and externally but in small quantities and subject to short turnaround times from initial acceptance onto site until dispatch.

4.1. Waste Acceptance

All deliveries are pre-booked, from known sources (Greene King contracts) therefore the prospect of any non-conforming waste is limited. All staff collecting and receiving waste are fully trained in identifying non-conforming materials at the collection point. A waste tracking system is utilised to document and manage waste transfer notes and number of totes collected (and whether $\frac{1}{4}$ full, $\frac{1}{2}$ full against the relevant EWC code).

Wastes accepted consist of cardboard and plastic packaging, aluminium and metal cans/tins, glass, waste oil and non-hazardous food waste.

Wastes are accepted within cages (cardboard and plastic), totes (tins/cans, food, glass) and already containerised (waste oil). At the initial waste acceptance area (see Site Layout Plan (K547.1~20~003), totes will be unloaded and the contents separated into dolav containers before plant takes these to 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. These are emptied into dolavs before loading onto trailers into 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 for cardboard and plastic whilst waste oil is loaded onto pallets and wrapped prior to dispatch. 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 three times per week, meaning that any waste stored is kept to a minimum.

The Management System Summary (MSS) (K547.1~09~002) describes the Waste Acceptance Procedure for the site.

4.2. Waste Processing

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

Site does undertake some washing of containers (totes) in which food wastes and other streams are received. This is undertaken using a dedicated plant, 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.

5. SOURCE OF ODOUR & SITE PROCESSES

The Environmental Risk Assessment (K547.1~09~003) (Section 04 of the Permit application pack), identifies the following hazards of greatest significance with potential to cause odour:

- Storage of food waste

5.1. Materials Entering & Leaving Site

Waste EWC codes for materials accepted on site are listed below. These materials have a low risk of producing odour. All wastes derived from catering and hospitality outlets and mainly comprise of bagged food wastes or food waste packaging.

15 01 01 - paper and cardboard packaging

15 01 02 - plastic packaging

15 01 04 - Metallic packaging

15 01 05 - Composite packaging

15 01 07 - Glass packaging

20 01 01 -paper and cardboard

20 01 02 - glass

20 01 08 - biodegradable kitchen and canteen waste

20 01 25 - edible oil and fat

20 01 39 - plastics

20 01 40 - metals

No hazardous wastes will be accepted on site. Once returned to site, the wastes are bulked up for onward transfer within sealed containers. Returned totes are washed for re-use, with the wash water discharged to foul sewer under an existing discharge consent.

The non-hazardous food waste is removed from customer premises in sealed totes and within sealed food-grade bags checked and sorted on site and placed into a fully contained trailer pending transport to an appropriately permitted treatment facility.

All vehicles carrying waste are cleaned in line with food safety and HACCP (Hazard Analysis and Critical Control Points) plan whilst all totes are cleaned within the bespoke area.

It is highly unlikely that malodorous waste will arrive on site as the waste is coming from a well-known coffee retailer where the collection totes are stored inside and where food safety regulations ensure that best practice is in place.

All incoming loads will be pre-booked, having undergone basic characterisation by the waste producer prior to delivery to site. Waste will only be accepted from suitably permitted facilities and delivered to site by registered waste carriers. On arrival, vehicle details will be recorded in the site diary, or similar document. Waste will only be accepted from companies who have provided a relevant Waste Transfer Note.

Waste deliveries will be inspected upon arrival and then directed to the designated areas and building.

The procedure for waste rejection is detailed in the Management System Summary (K547.1~09~002).

In the unlikely event that an odorous load is received, the materials giving rise to odour will be rejected and a record will be made. Olfactory/SNIFF test required to pinpoint source of odour. Once the source is Identified, contact responsible person and clean/remove as required.

5.2. Odorous Materials

Table 2 outlines the potentially odorous materials and an analysis of their risk due to variables, such as maximum quantity and maximum time held on site.

Table 2 Odorous Materials

Odorous and potentially odorous material	Odour potential	Maximum quantity on site at any given day	Maximum time held on site	Location of odorous materials on site	Additional comments
Food waste, collected from pubs for bulking up and temporary storage	Low odour potential	No more than 20 tonnes stored on site at any one time.	Waste is sorted on a day-to-day basis covering a 24-hour period. No waste food waste will be stored on site longer than 4 days.	All waste will be stored and processed on concrete hardstanding surfacing.	<p>Food wastes are collected and transported in sealed food-grade plastic bags, within plastic totes.</p> <p>Monitoring of odour will be undertaken as standard practice during observational tours (2 per day). Daily cleaning of operational areas is undertaken using water hoses, in-line with site operational procedures.</p> <p>Contracted pest control is in place to avoid infestation with pests as required by food safety controls.</p> <p>Lids on food waste skips/containers are kept closed to avoid scavenging by birds.</p>

5.3. Overview of Odorous Processes & Emissions

All waste food waste returned is approximately one day old, sandwiches and pastries. To minimise over-stocking, waste is sorted on a day-to-day basis covering a 24-hour period. Waste contractors are in place and waste skips are removed and replaced approximately twice per week or as required. All storage is either undertaken in skips or containers (trailers) both of which are of steel construction and can be securely closed. Site operatives will ensure that the oldest materials will always be removed first. This ensures good stock rotation for all stored materials and a clear method to manage the storage of all waste on site.

The site is equipped with mobile plant (e.g., loading shovels). All equipment is periodically inspected in accordance with manufacturers’ guidance and manuals, to ensure the plant and equipment is available for work when required.

The site is operated in accordance with written procedures incorporated within GXO Logistics’ Management System. All procedures: identify the potential hazards; include written instruction

on how to undertake tasks; and specify the required control measures (including PPE and safety equipment). Each procedure is accompanied by an activity risk assessment.

5.4. External Odour Emitting Operations

There are no potentially highly odorous sites adjacent to the waste operation and therefore should a complaint be received, an investigation will commence immediately on receipt of the complaint to determine whether the odour is the result of activities from the waste facility or from other nearby sites. The site is predominantly located in a commercial/ light industrial area (Trafford Park) and for the purposes of this OMP all sensitive receptors both Human and Environmental have been considered. Potential sources of odour emissions in the locality may include activities from other commercial and industrial services in the site proximity.

6. CONTROL MEASURES & PROCESS MONITORING

6.1. Appropriate Measures

Table 3 outlines the monitoring procedures and appropriate measures to mitigate the risk of fugitive odour emissions from site.

Wastes managed on site are sealed within food-grade bags, with acceptance checks undertaken at the point of collection, then the likelihood of odour is extremely small and failure to detect odours will be more rather than less likely.

Table 3 Monitoring Procedures for Appropriate Measures

Odorous and potentially odorous process / material	Control measures (Appropriate Measures)	Monitoring frequency	Monitoring procedure and optimum process parameters	Trigger level	Action taken if outside optimum process parameters
<ul style="list-style-type: none"> • Food waste, collected from pubs for bulking up and temporary storage 	<ul style="list-style-type: none"> • Effective monitoring of waste & acceptance checks undertaken at the point of collection. • Waste is managed on a 'first in first out' basis to ensure waste rotation. • Food waste (in biodegradable bags) collected from customer sites in sealed boxes (totes). • Tipped into fully contained trailers. Trailers typically collected 2x weekly. • Unloaded in controlled area, and stored in 	<ul style="list-style-type: none"> • Odour testing is undertaken daily. The waste area is monitored, including housekeeping, compliance and odour control, as part of the overall management process. 	<ul style="list-style-type: none"> • Daily, a member of the team will conduct a 'smell test' at the source of odour and at a point downwind of the odour. 	<ul style="list-style-type: none"> • Under normal operating conditions, the risk of odours being higher than a 3 (distinct odour) is very low, however exceptional circumstances there is a small chance of odours being realised, or a complaint received, by sensitive receptors. 	<ul style="list-style-type: none"> • If the odour rating is more significant than 'low' at any one location, then record findings. Always report any concerns, odours and or smells to your manager.

	<p>dedicated storage building.</p> <ul style="list-style-type: none">• Sealed drainage & interceptors on site and regular cleaning in place.• Minimising the time that waste is stored on site.				
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7. REPORTING & COMPLAINTS RESPONSE

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.

The complaints reporting procedure is detailed in the Management System Summary (K547.1~09~002) (Section 02 of the Permit Application Pack).

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 the Complaint Form (Appendix A) or other format with relevant information.

7.1. 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.

7.2. 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.

7.3. Pro-active Odour Monitoring

The TCM and site staff will monitor odour periodically throughout the day (at least twice). Any adverse observations, that are directly attributed to the site's activities, will be recorded and retained in the Daily Environmental Log (Appendix B).

7.4. Reactive Odour Monitoring

On receipt of a complaint, the TCM, or nominated person, will investigate the complaint to swiftly rectify the odour source. Odour checks at both the source and permit boundary will be carried out by the TCM, or nominated person, to check if the mitigation measures rectify the issue.

8. ABNORMAL EVENTS

Table 4 Abnormal Events

Abnormal event	Recovery steps
Equipment Breakdown	<p>Plant and equipment are visually inspected prior to every use to ensure it is in good condition with no faults.</p> <p>In the event of a failure or suspected fault with an item of plant or piece of equipment, the operator will ensure that the equipment is shut off/isolated in a safe manner and not used until the equipment can be repaired or replaced and ensure this is recorded on the defect log.</p>
Short-staffed or unable to remove materials	<p>In the event of emergency circumstances (e.g. collection vehicle breakdown resulting in non-collection of skip / container), the main waste contractors such as Bio-bean and Veolia as opposed to smaller waste companies will be used. This allows for a flexible contract that assures collection on urgent call outs and bank holidays.</p>
Prolonged precipitation event	<p>The integrity and functionality of the drainage system is tested regularly.</p>
Flood	<p>There is no risk of flooding within the permitted area. Fire water may cause flooding. In the event of a fire, any contaminated water can be pumped to a tanker for removal from site.</p>

9. APPENDICES

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Appendix A

Complaint Form

Appendix B

Daily Environmental Log



Helping clients prosper through compliance

Suite 11 Manor Mews, Bridge Street, St Ives, PE27 5UW
01480 462 232 | www.wiserenvironment.co.uk | info@wisergroup.co.uk

