



Reliance Street MTR, TLS and HWRC

2.1 Odour Management Plan

April 2026

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1	Permit Boundary Plan	RIIs-PER-1125-01
2	Site Receptor Plan	RIIs-REC-0424-01
3	Site Location and Layout Plan	RIIs-LAY-1125-01
4	Proposed HWRC Layout	216352-CCL-XX-00-DR-C-3000 P04

1 SITE DESCRIPTION AND GENERAL MANAGEMENT

1.1 Introduction

- 1.1.1 Reliance Street MTR, TLS and HWRC (the site) is located at Reliance Street, Newton Heath, Manchester, M40 3EZ at National Grid Reference (NGR) SD 88141 01015. The site location and permit boundary are presented in Figure 1 and 3 respectively.
- 1.1.2 This Odour Management Plan (OMP) is written to support an application for an environmental permit to operate a Mechanical Treatment Reception, Transfer Loading Station and Household Waste Recycling Centre (HWRC) at the site.
- 1.1.3 All SUEZ operations are certified to ISO 14001, ISO 9001 and ISO 45001 and operate under documented management procedures. All SUEZ operations are controlled by an Integrated Management System (IMS) as described in the Operations Management Plan (Document reference 1.2).
- 1.1.4 The OMP is to be reviewed as a minimum on an annual frequency by the Site Manager and the Environment and Industrial Risk (EIR) Manager to ensure it reflects the latest guidance, legislation, and the site operations. As a minimum the OMP will be reviewed after a change of operations or after an environmental issue and following an accident on site or receipt of a complaint.

1.2 Guidance

- 1.2.1 This OMP is a working document, intended to be used as a reference document for operational staff on a day-to-day basis. SUEZ will implement the plan to ensure that all reasonable measures are taken to control odour emissions. If an adverse impact is identified, prompt action will be taken to identify the source and apply corrective measures. It provides a schedule of actions that will be taken to minimise odour impact and details site management procedures for the management and monitoring of odour.
- 1.2.2 The OMP has been prepared in accordance with the following guidance document:
 - H4 – Odour Management Guidance.
- 1.2.3 The OMP will adopt a Source → Pathway → Receptor model with an emphasis on implementing effective and robust controls for odour abatement at the earliest stages possible (i.e. at source). The guidance acknowledges that assessment and control of odour can be difficult due to dispersal and the episodic nature of odour events.
- 1.2.4 The 'H4' guidance provides a regulatory framework by which a permitting officer can ensure compliance by the provision of specific conditions.
- 1.2.5 This document provides a summary of the physical and management controls that will be employed to minimise odour release. It provides a site-specific assessment of the potential sources of odour; the pathways odour can take from the site and the receptors it is likely to impact. The document also



outlines the control measures including monitoring and contingency actions to be deployed at the site to prevent or minimise odour.

2 DESCRIPTION OF WASTE ACTIVITIES

2.1 General Overview

- 2.1.1 The site will operate as an MTR, TLS and HWRC. The combined waste acceptance limit for the site will be 280,000 tonnes per annum.

MTR:

- 2.2 The facility will receive an annual throughput of up to 180,000 tonnes of residual household waste and bulk material delivered to the site in Refuse Collection Vehicles (RCVs) or stillage type vehicles. The waste is deposited onto a hardstanding area in the MTR reception hall where a combination of 360° mobile grab and loading shovel are used to push up the waste into stockpiles (storage bays), before transferring the waste into a shredder.
- 2.3 The shredder will reduce the waste to smaller than 300mm cut size. A set of mechanical belt conveyors feed the shredder waste material under an overband magnet that removes any ferrous material to be stored for recycling. The remaining residual waste is conveyed to three compactors which compact waste into containers.
- 2.4 The compacted waste is put into rail/road containers inside the building which, when full are detached from the compactor, sealed and then taken from the building for outside storage prior to loading onto rail wagons or road transportation.

TLS and HWRC:

- 2.5 The TLS and HWRC will receive an annual throughput of up to 70,000 and 30,000 tonnes of material delivered respectively to the site in RCVs, stillage type vehicles, cars and vans. The waste from the TLS will comprise mainly of Dry Mixed Recyclate (DMR) which contains glass bottles and jars, plastic bottles and steel and aluminium cans. The TLS will also accept, Mixed Paper and Card (MPC) and general waste from trade customers and charities. Waste will be deposited onto a hardstanding in the TLS reception hall, where a loading shovel will be used to move the material into a designated bay. The material will be removed from the site using a loading shovel and transferred into bulk haulage vehicles inside the TLS building.
- 2.6 Waste from the HWRC will be delivered by members of the public. Waste will be into various receptacles around the site.
- 2.7 Household hazardous waste will be located in hazardous waste boxes along with gas bottles, stored in cages. Waste engine oil is stored in bunded containers and waste cooking oil in 4 x 25 litre containers. Batteries will also be stored in battery boxes and Waste Electrical and Electronic Equipment (WEEE) will be stored in a separate container.
- 2.8 The location of the recyclables within the site may alter to provide operational flexibility however, they will always be stored with the pre-constructed bays.

2.9 Permitted Wastes

- 2.9.1 The waste types permitted to be accepted at the site are detailed in the Storage Plan (Appendix B) in the Operations Management Plan (Document reference 1.2).
- 2.9.2 The site is designed to accept, store and transfer, non-hazardous and hazardous wastes.

2.10 Process Description

- 2.10.1 Waste deposited at the MTR, TLS and HWRC are primarily unloaded into 3 distinct areas. There are two separate entrances to the site that are appropriately signed for visiting traffic of the 3 distinct deposit areas. The MTR and TLS are accessed via the same entrance and the HWRC is accessed via a separate entrance.
- 2.10.2 Wastes are stored with the aim of ensuring that different types of waste accepted are stored separately where possible to ensure they do not contaminate each other.
- 2.10.3 The MTR facility receives residual household waste and bulk material delivered to the site in Refuse Collection Vehicles (RCVs) or stillage type vehicles. The waste is deposited onto hardstanding in the MTR reception hall, where a loading shovel is used to push up the waste into stockpiles (storage bays), before transferring the waste into the shredder. The non-recyclable shredded waste is then compacted before being loaded onto a train which takes it to an Energy Recovery Facility.
- 2.10.4 The TLS material is delivered to the site in RCVs, stillage type vehicles and vans. Vehicles are directed to the appropriate tipping bay within the TLS building. The waste for the TLS will comprise primarily (i) dry mixed recyclables (DMR) which contains glass bottles and jars, plastic bottles and steel aluminium cans (ii) mixed paper and card (MPC) and (iii) general waste from trade customers and charities. Waste will be deposited into a designated bay. The material will be removed from the site using a loading shovel and transferred into bulk haulage vehicles inside the TLS building.
- 2.10.5 The HWRC will have waste delivered by members of the public. Waste will be deposited into receptacles, containers, secure compounds and cages around the site. These containers once full will be removed from site. The HWRC will close and be redeveloped in 2025-26 with a revised layout.
- 2.10.6 An indicative site location and layout plan is presented in Figures 3 and 4.

3 SOURCE, PATHWAY, RECEPTORS CHARACTERISATION

3.1 Odour Source

3.1.1 The proposed activities are limited to the handling, storage and transfer of wastes, therefore the main source of odour considered by this report relate to these activities only.

3.1.2 The following table provides an inventory of all potential odour sources and the odour generating sources at the site.

Table 1 - Odour Source Inventory

Odorous and potentially Odorous Materials	Odour Potential	Maximum time on site	Location on site	Maximum quantity on site at any one time (approx.)	Source and age of waste on arrival
General Municipal/ Residual black bag EWC codes 20 03 01 20 03 02	Medium	48 hours during weekdays or 72 hours over the weekend and bank holiday	MTR (areas 1 and 2) and HWRC (areas 13)	Approximate total volume in areas 1 and 2 = 900m ³ Approximate total volume in area 13 = 54m ³	Domestic households. Up to 72 hours when arriving on site
Green/garden waste EWC codes 20 02 01	Medium	1 week	HWRC (areas 15 and 24)	Approximate total volume in areas 15 = 37.5m ³ Approximate total volume in areas 24 = 112m ³ .	Domestic households. Up to 1 week from arrival to site.

3.2 Odour Pathway Characterisation

Overview

3.2.1 The principle mechanism for the transit of odorous emissions from site operations to adjacent sensitive receptors is via ambient air. The distance and direction that these emissions will be carried is determined by the following factors:

- Source Related Pathways
- Meteorological Conditions

- Topography

Source Related Pathways

- 3.2.2 The pathway that an odorous emission takes from a site may depend on the specific source term and/or location it arises from. The nature of the source related pathway could also influence the scale of the resulting impact on a sensitive receptor.

Meteorological Conditions

Wind Direction

- 3.2.3 The main controlling factor in determining the pathway of odour is the ambient meteorological conditions. This is fundamental to the transportation of odour to sensitive receptors.
- 3.2.4 Wind direction will determine which receptors will be affected and at what frequency. The data was obtained for Reliance Street (Manchester). The prevailing wind direction is from the west south west. A compass rose from meteoblue.com, with the prevailing wind direction, is included in Figure 2.
- 3.2.5 Areas most at risk from an odorous emission, should it occur, are therefore located north east of the site which is predominately other industrial uses and residential properties.

Wind Velocity

- 3.2.6 Wind velocity will affect the distance an odour emission will travel. Conversely, increased wind speed could also beneficially improve dispersal. However, those receptors closest to the site are still at the highest risk of a negative impact.

Air Temperature

- 3.2.7 Warm air may carry odours upwards by convection for dispersal away from the site. However, warm weather will encourage the onset of biodegradation of exposed or temporarily stored wastes and therefore increase odour potential.

Adverse Weather Conditions

- 3.2.8 Unusual weather conditions may increase the risk of odour emissions from the site. Site staff will be vigilant to unusual trends in the meteorological data or forecasts which may indicate strong winds or extremes of temperature which may cause a potential problem. The types of weather conditions that may impact on odour generation and emissions and appropriate contingency actions are detailed in Section 5 below.

3.3 Odour Receptor Characterisation

- 3.3.1 The site is bounded to the north by the Moston Brook with woodland and fields and residential properties beyond. To the east and west the site is bounded by neighbouring industrial premises. To the south of the site is a railway line.

- 3.3.2 A search of the Multi-Agency Geographic Information for the Countryside (MAGIC) website confirms that there are no sites of European ecological significance within 1km of the site.
- 3.3.3 Sensitive receptors within 1km of the site have been identified within Table 2 and are shown in Figure 2.

Table 2 – Sensitive Receptors

No.	Receptor	Category	Distance (m)	Direction from site
1	Rochdale Canal	SAC, SSSI, Surface Water	680	South East
2	Moston Fairway Nature Reserve	Local Nature Reserve, Local Wildlife Site	455	North East
3	Reliance Trading Estate	Industrial	45	South
4	Reliance Enterprise Park	Commercial	15	West
5	Commercial units between the Rochdale Canal and the A62	Commercial	500	South
6	Failsworth Industrial Estate	Industrial	300	East
7	Residential areas in Newton Heath	Residential	500	South
8	Residential area in Moston	Residential	1000	South
9	Residential area in Failsworth	Residential	245	East
10	Co-op Academy Broadhurst	Educational	185	North

11	All Saints Primary School	Educational	576	South
12	Christ the King RC Junior & Infants School	Educational	770	South
13	St Wilfrid's Primary School	Educational	955	South East
14	Spring Brook Upper School	Educational	715	North East
15	Mather Street Primary School	Educational	830	North East
16	St Dunstan's RC Primary School	Educational	865	Norths West
17	Oxford Road Community Park	Recreational	820	South
18	Brookdale Park	Recreational	1000	South East
19	Allotment Gardens	Allotment Gardens	320	North West
20	Newton Heath Rail workshops	Railway Infrastructure	230	West
21	Industrial units	Commercial	Adjacent	East
22	Railway Line north of the site	Railway Infrastructure	440	South
23	Broadway	Public Highway	550	East
24	Deciduous Woodland	Priority Habitat	Adjacent	North

25	Deciduous Woodland	Priority Habitat	220	North West
26	Deciduous Woodland	Priority Habitat	320	North West
27	Deciduous Woodland	Priority Habitat	165	North East
28	Deciduous Woodland	Priority Habitat	445	North
29	Deciduous Woodland	Priority Habitat	480	South West
30	Deciduous Woodland	Priority Habitat	790	South East
31	Rochdale Canal - Lock at Scowcroft Farm to Stott's Lane	Local Wildlife Site	325	South
32	Rochdale Canal Stott's Lane – Ducie Street Basin	Local Wildlife Site	325	South
33	Broadhurst Clough	Local Wildlife Site	320	North West
34	Moston Brook	Surface Water	40	North
35	Groundwater (Principal)	Groundwater	-	Beneath site

4 ROLES AND RESPONSIBILITIES

4.1 Site Management

- 4.1.1 The implementation and dissemination of this OMP will be the responsibility of the Site Manager, supported by other staff. The Site Manager can delegate certain tasks as required, although ultimate responsibility will remain with them.
- 4.1.2 A nominated deputy will be appointed for all times when the Site Manager is not on site. In such circumstances, it will be the nominated deputy's responsibility to ensure that the requirements of the OMP are adhered to.

4.2 Staff Training

- 4.2.1 Staff training will be a key aspect of ensuring that odour can be controlled through effective management during daily operations. All site operatives will therefore be trained via toolbox talks to deal with odour management issues. Annual refresher toolbox talks will ensure that the requirements of the OMP are reinforced. Toolbox talks will be delivered by the Site Manager who has received appropriate training.

4.3 Maintenance

- 4.3.1 SUEZ's Emergency Preparedness and Response procedures provide a clear structure of responsibility which allows operational staff to call in specialist contractors to deal with emergencies and unplanned events which may lead to an odour impact. For occasions when the manager is off site then the nominated deputy will be authorised to take appropriate action.
- 4.3.2 A list of approved repair contractors will be maintained on the company's intranet and all staff with delegated responsibility should be aware of this list. In line with SUEZ's Policies and Procedures, if a part of the site infrastructure fails and cannot be fixed within 24 hours then a report will be made on EcoOnline.
- 4.3.3 If maintenance is required on site to prevent odour, then the EA will be informed. Repairs will be initiated and completed as soon as possible. EcoOnline include checks on site infrastructure, which will allow preventative maintenance to be carried out.

4.4 Sub-Contractors

- 4.4.1 All sub-contractors working at the site, will be subject to the requirements of the OMP. It is the site manager's responsibility to inform sub-contractors of their responsibilities on site. Failure to comply with odour control measures will result in a Notice of Infringement being issued to the operative and



their employer. Further failures to comply may result in that person being banned indefinitely from all SUEZ sites.

5 ODOUR MANAGEMENT AND CONTROL

5.1 Waste Acceptance

- 5.1.1 The site operators will ensure that capacity is available on-site before accepting waste from members of the public. In particular, if the waste storage area is full, all inbound loads of waste must be diverted until the quantity of waste on site has been reduced this will be recorded in the site diary.
- 5.1.2 Only waste types detailed within the environmental permit will be accepted at the site.
- 5.1.3 Where practicable, the site operatives will complete a visual inspection of the waste being deposited at the site.
- 5.1.4 In the MTR wastes that are believed to cause a significant odour problem will be prioritised for processing within the MTR.
- 5.1.5 The site buildings operates with an automatic door system with sensors. This includes opening doors to all access or egress to and from the facility, once a door has been opened it will be closed as quickly as possible to avoid odours escaping the buildings. Pedestrian access doors will be open only to allow personnel to move around the facility.
- 5.1.6 Should particularly odorous wastes within the TLS and HWRC believed to cause an odour problem, they will not be accepted at the site where possible. Should the situation occur where a deposit of waste could cause an odour problem at the site, the waste will immediately be prioritised for removal. Recording of such information will allow the site to identify any sources of waste which persistently do not meet acceptance requirements enabling remedial action to be taken.

5.2 Waste Storage

- 5.2.1 The primary control of odour on site is that all potentially odorous wastes (as detailed in Table 1) will be stored within the MTR building which has its own odour abatement system. Other potentially odorous wastes situated on the HWRC can be transferred into containers for odour control.
- 5.2.2 The odour abatement system within the MTR involves air from the building being extracted at several locations by a ventilation system and treated by abatement plants which intended to abate dust, particulate matter and odour prior to discharge to atmosphere through a tall stack.
- 5.2.3 Most of the potentially odorous wastes mainly general municipal waste on site will be stored for a maximum of 48 hours (72 hours during bank holiday and over weekends). The maximum storage time for green and garden waste is 1 week due to the variation of quantity received at any one time depending on seasonal variations. The short turnaround time of potentially odorous wastes stored on site will minimise the likelihood of odour to develop.

- 5.2.4 Visual inspections of the waste storage areas will also be undertaken by the Site Manager to ensure that the volume of waste is not exceeded.

5.3 Waste Handling

- 5.3.1 Material will be delivered, processed and removed from the site as described in Section 2.3 above.
- 5.3.2 Waste material will be moved in a regular and consistent manner and the site will operate a first in and first out policy on all waste streams to ensure that waste is removed from site as quickly as possible to prevent further degradation and minimise potential generation of odour.

5.4 MTR Odour Abatement System

- 5.5 The odour abatement system is designed to provide extraction from 2 areas – the main hall (waste reception, short-term storage and transfer to the compactor feed conveyors) and the compaction hall (used for filling and compaction of waste into ISO containers).
- 5.6 Both areas of the MTR building are kept at negative pressure, drawing air in via the air inlet louvres. All inlet louvres are installed with bird/vermin and insect meshes. The inlet louvres are fitted with open/close actuators, which are interlocked with Main Hall roller shutter doors.
- 5.7 A series of extraction dampers are installed in the extractor ductwork to provide a sweep of air across the operating halls, picking up contaminated air and drawing it away from the inlet louvres and vehicle doors. There are also extraction connections to conveyor hoods in the compaction area.
- 5.8 The duct header exists the building to the Odour Control Plant where the extracted air stream is passed into a 4-chamber dust filter. The particle-free discharge from the dust filter is passed an annular carbon filter, before being discharged into atmosphere via the 25m high discharge stack.

5.9 Housekeeping

- 5.9.1 The site will be subjected to a good housekeeping regime which assists with the aim of proactive management and associated environmental compliance. Daily inspections will be undertaken at the site via the SUEZ Vision App.
- 5.9.2 As described in more details in Section 5.2 all potentially odorous waste will be unloaded into dedicated containers or cages/compounds. Any possible spillage will be clean at the earliest opportunity. This will reduce the potential for odour. This will contribute to maintain a clean and organised site. Regular cleaning will be undertaken in the waste storage areas, including floors and containers to ensure the removal of any residues or debris.

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- 5.9.3 In addition, any equipment on site that has been in contact with potential Odorous materials will be cleaned as and when deemed necessary.
 - 5.9.4 Potentially odorous waste are stored within the MTR building or can be transferred to containers if required in the HWRC.
 - 5.9.5 In addition to operating a first in and first out policy the waste storage areas will be regularly emptied to allow it to be cleaned thoroughly.

5.10 Odour Checks

- 5.10.1 Regular odour checks are carried out to identify any potential odours as detailed in Section 6.2 below. Should any odour be identified, then contingency action shall be followed.

6 ASSESSMENT, REPORTING AND CONTINGENCIES

6.1 Overview

- 6.1.1 Prevention is viewed as the most effective means of controlling odour before an impact occurs. The Source → Pathway → Receptor model allows for the identification of the critical control points where odour can arise, how it can travel to a receptor and the likely impact.
- 6.1.2 It is intended that the odour management system will mitigate any potential odour impacts of the activity on the identified receptors. Should complaints be received, procedures will be in place to effectively deal with the issue in a sensitive, efficient and auditable manner.
- 6.1.3 The controls for each source term are detailed in previous sections of this report. The management of those controls will be based on the on-going monitoring regime at site. The monitoring regime can work as an early warning system to potential problems (e.g. meteorological monitoring) or a diagnostic tool to establish the cause of an odour event (e.g. perimeter monitoring).

6.2 Assessment

Odour checks

- 6.2.1 The Site Manager will be responsible for ensuring that daily odour inspections are made of the site and its perimeter boundary in order to identify any sources of odour and to establish whether any odours are discernible. Any odour issues are recorded on the SUEZ Vision App
- 6.2.2 However, the site management do not solely rely on the odour checks and odour is continually assessed by all staff present on site and any odours identified outside the regular inspections are reported to site management for investigation.
- 6.2.3 Generally, the site supervisor will carry out the daily odour checks. Any odours identified must be clearly marked on the SUEZ Vision App.
- 6.2.4 Should a distinct odour be identified during a routine odour check then an investigation on the source of the odour will be undertaken.
- 6.2.5 Upon identification of an incident or failure of a control measure, then in consultation with the EIR Manager, the odour check frequency might be increased to twice daily, if necessary.
- 6.2.6 Should an odour be attributed to the site and the odour sources cannot be resolved within a timely manner, then an odour inspection shall be undertaken at key sensitive receptors and recorded on the external odour assessment survey, which will clearly indicate whether or not odour was detected.

- 6.2.7 Should an odour attributed to the site be recorded external to the site as detailed above, then an investigation shall be carried out and recorded on the odour assessment form included in Appendix A.
- 6.2.8 The Site Manager will be informed immediately of any findings of odour attributed to the site and will authorise remedial measures to be taken. Remedial actions may include but be not limited to:
- Checking storage areas to identify the source of the odour to a particular waste.
 - Removal of the odorous waste at the earliest opportunity and within 24 hours.
 - Cleaning of storage area.

Odour Assessment

- 6.2.9 In the event of an odour issue, due to the potential for desensitisation to odours, odour assessment will be carried out by site personnel who do not work closely with handling waste e.g. office or weighbridge staff. These personnel will be the most suitable to detect any fugitive odour outside the site. Routine odour assessment shall be undertaken, where possible, during hours of waste acceptance and prior to those assessing the odour having entered operational areas where they may be likely to be exposed to odours.
- 6.2.10 Those undertaking odour assessment should try to avoid where possible strong food or drinks, including coffee, for at least half an hour beforehand and strong scented toiletries and deodorisers in any vehicle used during the assessment. Where possible the use of perfume sprays, cleaning products etc are avoided within the offices to prevent exposure.
- 6.2.11 Should staff have been exposed to odours within the facility or any scented products, food or drinks prior to undertaking odour assessment then they may request that the assessment is undertaken by someone else. If this is not possible then the assessor may leave site for a period of time (approximately 15 mins or more) or complete the assessment but ensure that a follow up assessment is carried out after half an hour.
- 6.2.12 Routine odour assessment should, where possible, be undertaken by staff who have undergone odour acuity assessment to ensure a suitable detection threshold for odours.
- 6.2.13 Odour assessment is carried out using sniff testing to check ambient air on or off site.
- 6.2.14 Off-site olfactory assessment will be carried out with reference to the H4 Odour Management Guidance, with an odour assessment form being completed. All site personnel will be responsible for reporting any odour problems immediately to the site manager or the next level of management if the manager is not available.
- 6.2.15 The form used for odour inspections and assessments is included within Appendix A.

6.2.16 All odour assessments are undertaken using the intensity scale detailed below which is in line with the H4 Odour Management Guidance. This ensures consistency and enables odour assessments taken by Site Management to be compared with odour assessments taken in conjunction with or independently by the Environment Agency.

- 0. None
- 1. Very Faint
- 2. Faint
- 3. Distinct
- 4. Strong
- 5. Very Strong
- 6. Extremely Strong

6.3 Complaints Management and Reporting

Investigation and Records

- 6.3.1 All complaints and queries received at the facility or via the regulatory bodies including the Environment Agency and Local Authority will be logged in accordance with the integrated management system as soon as practicably possible. Where possible, as much information and detail about the complaint will be recorded, whether this is from the relevant authority or complaint direct to site. All complaints logged will be subject to investigation and complainants responded to as necessary following completion of the investigation. All responses will be through trained and experienced staff.
- 6.3.2 Complaints management will be undertaken in line with IMS – Amenity Complaints. The first stage of complaints investigations is to complete a basic screening exercise to determine if the site is the likely cause and if further, more detailed investigations are required. Once determined that further investigations are needed an off-site and on site odour investigations are carried out using the Amenity Complaint Investigation Form included within Appendix B.
- 6.3.3 Complaints investigations are carried out by site management that are not regularly exposed to the odours and therefore are able to assess the level of odour objectively.
- 6.3.4 Should a complaint be received out of operational hours of a current / ongoing issue then site management shall try to attend site as soon as possible to carry out an investigation, dependent upon availability.
- 6.3.5 Where necessary, the Environment Agency shall be informed of the investigation findings so they can relay this back to the complainant.
- 6.3.6 SUEZ will ensure that the complainant has relevant contact details for the site (i.e. the Site Manager). SUEZ will be in regular contact with the complainant and / or the EA where necessary, whilst any odour issue is being investigated or remediated.

- 6.3.7 An evaluation of the effectiveness of the techniques used will be carried out on completion of any remedial measures or if the complaints persist. Records of the above will be retained by site for future reference.

Non-Conformances and Complaints

- 6.3.8 The investigation will determine the source of the complaint and then the cause of the odour.
- 6.3.9 If an odour can be directly related to the site, corrective actions will be identified and programmed for remediation. Actions taken in response to any odour complaint will be recorded on the Amenity Complaint Investigation form.
- 6.3.10 Corrective action procedures are documented in IMS – Non-conformance, Corrective and Preventive Actions. A list of all policies and procedures is included in the Operations Management Plan, which forms part of the Environmental Permit.
- 6.3.11 If remediation cannot be completed within 24 hours then the non-conformance and remedial actions shall be raised on the SUEZ Compliance and Audit System (COMPAS).
- 6.3.12 SUEZ operates an open communication policy with residents and businesses surrounding its sites and will engage with them if deemed necessary.
- 6.3.13 If necessary, following received complaints, SUEZ will engage and communicate with its neighbours to improve understanding of possible odour issues. This will include detailing the efforts being undertaken to control odour; and importantly the actions being taken in response to their complaints.
- 6.3.14 Should any problems associated with odour be identified (either by SUEZ or through external sources), SUEZ would engage with those surrounding the site to ensure that they are kept up to date and have means of communicating with SUEZ through an appropriate communications strategy established by the SUEZ communications team and in agreement with the client. This may include letter drops, visits to the site, open community meetings, social media updates and if appropriate and in agreement with the local residents and political representatives, and if necessary, the establishment of a Community Liaison Group (CLG).

Odour Complaints and Management Review

- 6.3.15 All complaints will be investigated by the Site Management including but not limited to a review of the number of complaints, weather conditions, investigations and remediation works. If required, the Operations Management Plan (Document reference 1.2) and OMP shall be updated to reflect any changes made to the management procedures on site following the review.
- 6.3.16 Site Management and the EIR Manager will review all procedures for the facility as necessary against other SUEZ operations and management procedures as well as industry practice, guidance and

legislation to ensure continued best practice is carried out at the facility. Any amendments to practices on site will be reflected in updates of the Operations Management Plan and the OMP.

- 6.3.17 All complaints received by the site are recorded. All odour complaints are reported to the EIR Manager and communicated to relevant parties within SUEZ as part of the EIR Department's monthly review.

6.4 Means of Contact

- 6.4.1 The site will be readily contactable to outside organisations and to members of the public. The site signage board (placed in a readily visible location) contains the necessary contact details for both the site operations and Environment Agency.

6.5 Contingency and Emergency Plans

- 6.5.1 In the event that odour is proven to be from the site and found to be causing a problem, as determined by the investigation of off-site complaints or during routine on-site monitoring, action will be taken to determine the source.

6.6 Abnormal Events

- 6.6.1 The OMP assumes that the site will be running under expected operational conditions. There are however a number of circumstances which could result in an odorous emission from the site if not appropriately considered in advance.

Temperature Inversions

- 6.6.2 The conditions that can facilitate a temperature inversion (warm odorous air trapped beneath a layer of cold air under still conditions) can be predicted by simple regard to local and regional weather forecasts. If such conditions look possible olfactory monitoring will focus on the down-flow boundaries of the site to monitor for the early signs of low-level odour movement.

Storm Conditions

- 6.6.3 Severe storms may result in disruption to the removal of materials from site. However severe storm conditions are unlikely to be prolonged. Therefore, it is considered unlikely that this will cause a major odour issue on site as potentially odorous waste will unlikely be stored for more than 48 hours (72 hours during bank holiday).

Hot Conditions

- 6.6.4 There is a greater potential to generate odour during warm weather and therefore an increase in ambient air temperature may result in increased odour. During prolonged periods of hot weather

olfactory monitoring frequency will be increased and any wastes identified as generating an odour will be prioritised for removal from site.

Implementation of the Contingency Plan and/or Emergency Plan

- 6.6.5 Should the situation occur where a waste deposit could cause an odour problem is delivered to site, the waste will be immediately placed in a designated areas and prioritised for processing at the MTR or removed as soon as practicably possible at the TLS and HWRC.
- 6.6.6 Should site maintenance be required that would significantly disrupt normal operations and could have the potential to cause an environmental impact (for example during emergency situations), staff will initially inform the site manager who will in turn inform the Environment Agency. Site staff will implement measures to store or divert waste as required.
- 6.6.7 The contingency plan in place at the site is discussed in more details in Table 3 below.

Table 3 - Contingency Plan

ISSUE	POTENTIAL IMPACT ON SITE OPERATIONS	PERIOD	MITIGATION PLAN
Storage capacity full. Site not available as a storage place	This could potentially mean that the site does not have capacity to accept waste for deliveries	1 day	Direct waste to alternative storage area/permitted site.
		Up to 72 hours	As above Risk assess odour generation and impact by increasing Odour Assessment
Storage capacity full due to mobile plant mechanical failure	This could potentially mean that the site does not have capacity to accept waste and to transfer waste off site	1 day	Address mechanical failure and/or issues Mobile plant can be hired at short notice from preferred contractor or brought from one of SUEZ's other facilities.
		Up to 48 hours	As above Risk assess odour generation and impact by increasing Odour Assessment
		Up to 72 hours	Direct deliver to alternative storage area/permitted site Address mechanical failure and/or issues

ISSUE	POTENTIAL IMPACT ON SITE OPERATIONS	PERIOD	MITIGATION PLAN
			Plant can be hired at short notice from preferred contractor or brought from one of SUEZ's other facilities. Identify alternative longer-term storage area or cover containers.
Waste removal halted storm conditions / power plant shut down.	Difficulties in removing waste could lead to waste accumulating on site.	1 day	Receive waste and store up to the permit capacity limit and for no-longer than the maximum duration.
		Up to 72 hours	Risk assess odour generation and impact by increasing Odour Assessment Implement medium term solution i.e. transfer to alternative site.

Experience with Contingency/Emergency Situations

- 6.6.8 SUEZ is experienced in developing contingency plans for other long-term contracts which have worked effectively on previous occasions.
- 6.6.9 SUEZ has a policy of continuous review of emergency and contingency procedures and this has allowed experience from these incidents to be used to improve procedures across the operations.
- 6.6.10 SUEZ experience in operating a significant number of waste facilities, together with managing complex long-term contracts offering similar services, means that SUEZ is able to offer the benefit of experience in and knowledge of logistical planning to ensure that service continues effectively with minimal disruption.

Review and Update of Contingency and Emergency Plans

- 6.6.11 The Contingency Plan and Emergency Plan will be reviewed following any incident where they have had to be followed. They will be updated as necessary incorporating the outcome of any lessons learned.



Appendices



Appendix A – Odour Inspection Form

Odour Investigation - Detailed Assessment Form

To be completed after odour is detected on external assessment form, or following a complaint

ODOUR ASSESSMENT REPORT

CAR Ref

Installation Location

Date

Weather

Wind (strength & direction)

Temperature

Bar Pressure (mbar) if known

Ground Condition

General Air Stability (if known)

General Air Quality

Cloud cover

Time Start

Time Finish

Plan attached showing location and extent of odour

Yes / No

(delete as appropriate)

Complaint Received

Yes / No

Date/Time complaint received

Location of Complaint Area

Number of complaints (related to the same source)

Grid reference (where location is not a property)

Time odour noticed and duration

Test Location	Intensity (0-6)	Extent (0-6)	Severity (0-6)	Offensiveness (0-6)	Sources within facility	External sources

0 - None, 1 -Very Faint, 2 - Faint, 3 - Distinct, 4 - Strong, 5 - Very Strong, 6 - Extremely Strong

Additional Comments

Signed

Persons Contacted Regarding Process

Action Required



Appendix B - Amenity Complaint Investigation Form



THIS FORM MUST BE COMPLETED FOR ALL AMENITY COMPLAINTS THAT REQUIRE AN INVESTIGATION IN LINE WITH IMS 3.36B. IF MORE THAN ONE OF THE SAME TYPE OF COMPLAINT IS RECEIVED IN ANY ONE DAY, THEN ONE INVESTIGATION FORM CAN BE USED TO COVER ALL COMPLAINTS OF THE SAME NATURE.

1. Investigating Manager/Supervisor

A) Name		B) Position	
C) Location*	<i>*Note: this is the SUEZ location the complaint relates to</i>		

2. Complaint Type/Location

This section looks at the type of complaint that has been received, as well as the location it was made from.

A) <u>When</u> did the complaint and investigation occur? <i>*Note: the issue may have been experienced by the complainant before they made the complaint</i>	Alleged issue: Date: _____ Time: _____	Complaint made: Date: _____ Time: _____	Investigation: Date: _____ From (time): _____ To (time): _____
	Have any other related complaints been received within the last 7 days? Yes ☐ No ☐ If yes, provide basic detail:		
B) <u>What</u> type of amenity complaint has been made? <i>*Note: tick all that relate</i>	Odour ☐ Dust ☐ Noise ☐ Litter ☐		Mud or Debris ☐ Pests ☐ Light ☐ Other ☐ If other, please detail: _____
	Basic description of amenity issue: _____ (e.g. type of odour)		
C) <u>Where</u> was the complaint made from? <i>*Note: this is the complainant's location. The exact location may not be provided if the complaint has been received via the environmental regulator or local authority</i>	Full address (if known): Postcode (if known): If the above are unknown, then provide the approximate area of the complaint:		

3. Weather Conditions

Weather conditions at the time of the alleged issue and during the investigation are important. Some weather conditions can cause amenity issues to be worse, so it is important to provide details where they are known.

A) <u>What</u> were the weather conditions like at the time the complainant experienced the issue? <i>*Note: you may only be able to accurately identify this if you have a weather station on site</i>	General Description: Wind (speed and direction): _____ Temperature (°C): _____ Raining? Yes ☐ No ☐ Ground conditions: Wet ☐ Damp ☐ Dry ☐
B) <u>What</u> were the weather conditions like at the time of the investigation? <i>*Note: you can use weather data from a weather station, the Met Office and your own observations</i>	General Description: Wind (speed and direction): _____ Temperature (°C): _____ Raining? Yes ☐ No ☐ Ground conditions: Wet ☐ Damp ☐ Dry ☐

4. Off-Site Investigation

It is important to attend the complainant's location to assess whether an impact is occurring. Guidance on what to look for is available in IMS 3.36b.

A) What is the amenity impact at the complainant's location? <i>*Note: identify whether there is any impact being caused and indicate the severity</i>	Amenity impact? Yes ☐ No ☐ If yes, detail the severity. For odour, refer to the odour intensity and extent details in Appendix A. For other amenity issues, provide a basic written description:
B) Note any other sensitive receptors in the complainant's location	<i>*Note: refer to housing, parks, pubs etc</i>
C) Are there any other actual or potential sources of amenity impact in the local area?	

**Note: if another source is identified causing an amenity impact, then ensure this is detailed*

5. On-Site Investigation

Following the off-site investigation, it is essential to assess what was occurring on site. If a complaint is received or investigated after the alleged issue, then it may be difficult. If this is the case, then provide an overview of the operations that were occurring at the time of the alleged issue. Guidance on what to look for is available in IMS 3.36b.

A) Site activities <i>*Note: CCTV footage may be useful in determining site conditions at the time of the alleged issue. If an amenity issue has not been traced back to site, then it is still useful to provide detail of site conditions at the time.</i>	If an amenity impact was noted in section 4A, then state whether this has been traced back to site operations. Focus on the following areas: - Waste inputs/outputs - Waste storage - Waste treatment processes - Condition of infrastructure
B) Non-conformance	If the amenity impact can be traced back to site, state whether this was as a result of a non-conformance: Yes ☐ No ☐ If yes, provide detail: <i>*Note: you may need to refer to the Permit and site-specific management plans</i>
C) Corrective action <i>*Note: provide COMPAS CAR reference number if the required action has been raised as a CAR</i>	If a non-conformance has been identified, then state what has been done to remediate this:

6. Supporting Information & Evidence

Supporting information can be useful in building a picture of the incident.

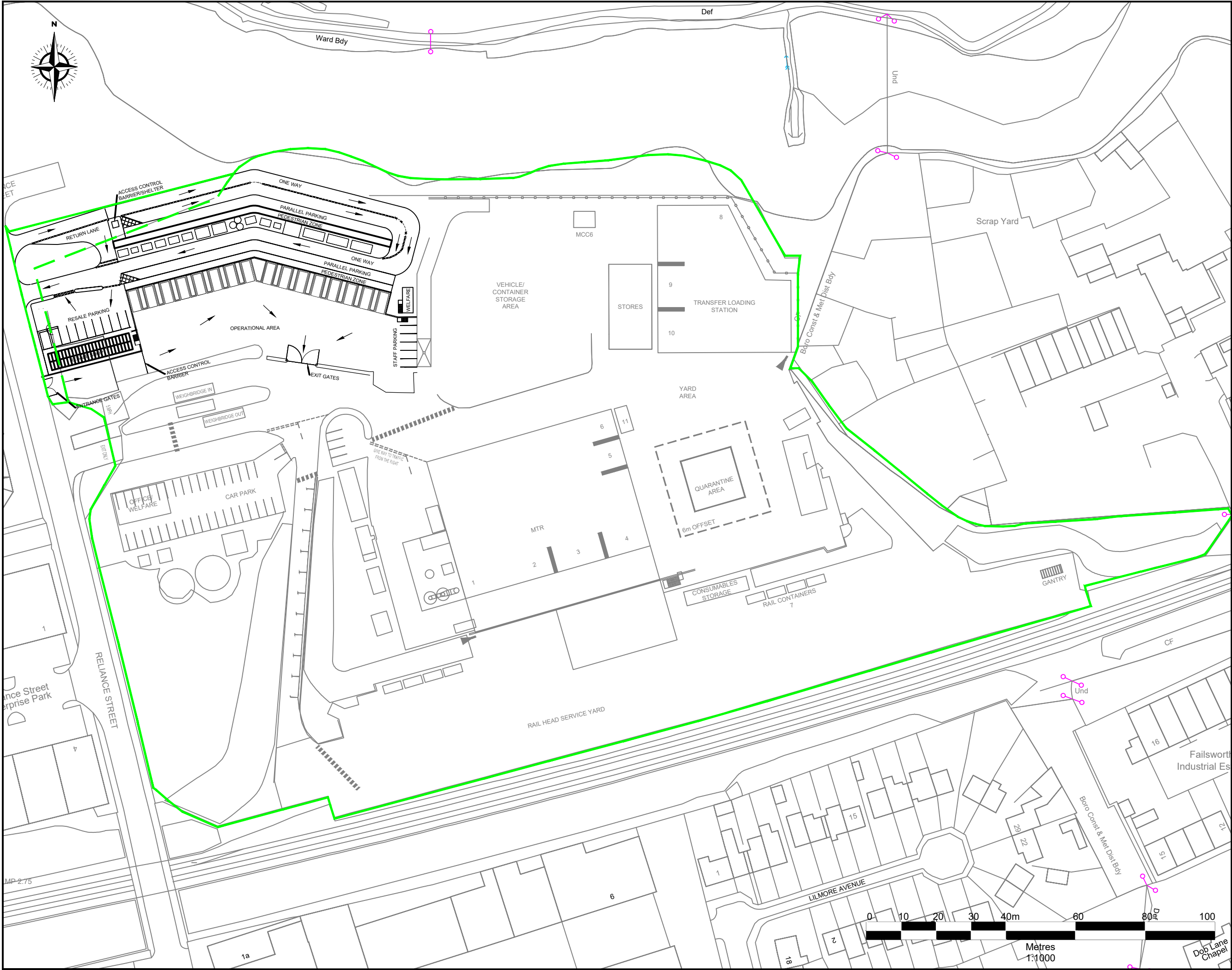
A) Attach any photos or videos	
--	--

11. Appendix A

Odour Intensity	Odour Extent (assuming odour is detectable)
0: No detectable odour	1: Local and impersistent (only detected during brief periods (wind drops/blows
1: Very Faint Odour (barely detectable, need to stand still and inhale facing into the wind)	2: Impersistent as above, but detected away from site boundary
2: Faint Odour (odour easily detected while walking and breathing normally, possibly offensive)	3: Persistent, but fairly localised
3: Distinct Odour	4: Persistent and pervasive up to 50 m from site boundary
4: Strong Odour	5: Persistent and widespread (odour detected >50 m from site boundary)
5: Very Strong Odour	
6: Extremely Strong Odour	

Figures

Figure 1 – Permit Boundary Plan



Notes

1. Reproduced from the Ordnance Survey Map with the permission of the Controller of Her Majesty's Stationary Office, Crown Copyright, Licence Number 100004910.

- Current Permit Boundary
- Proposed Permit Boundary

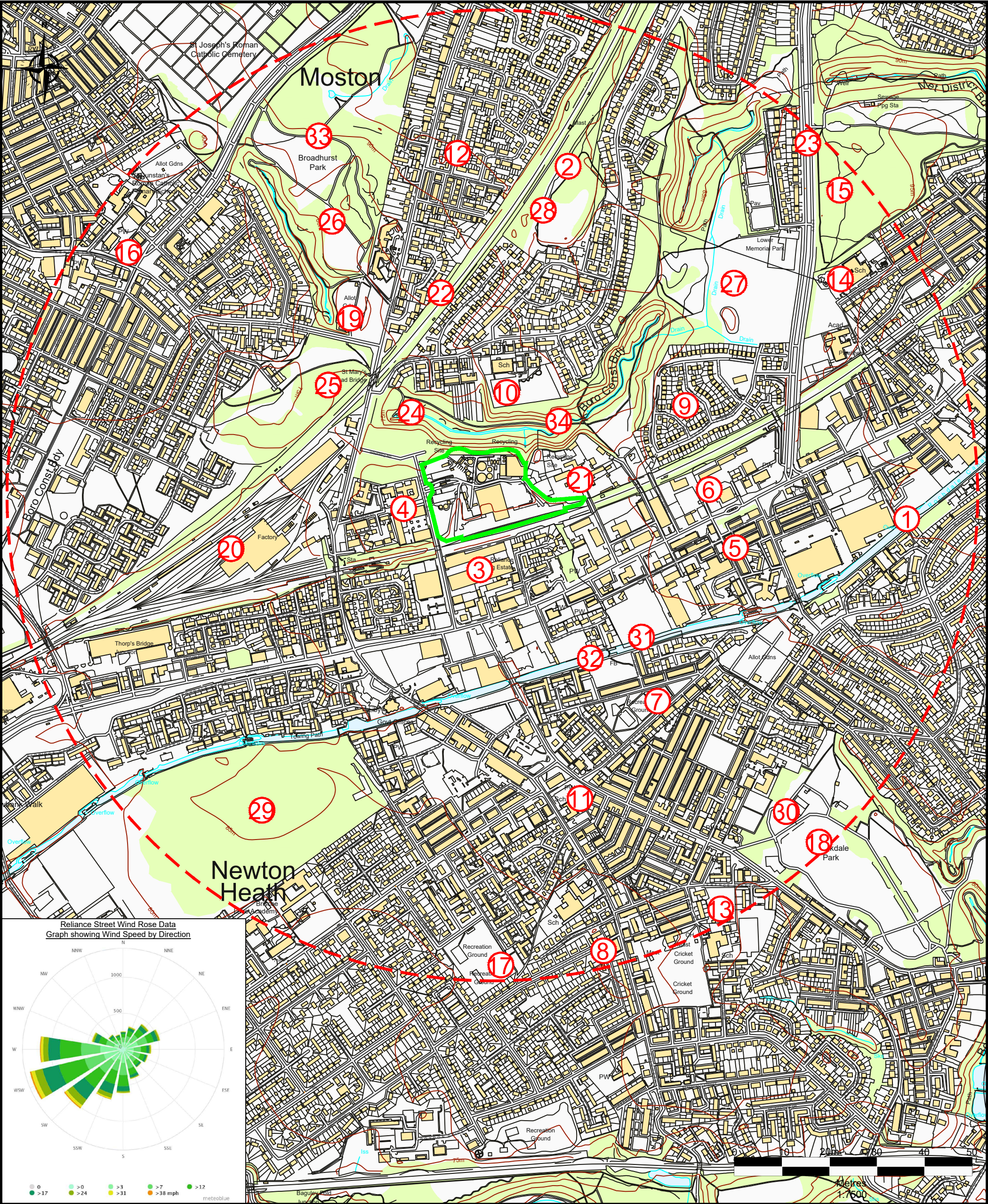
Rev	subject	date



Darwen Resource Recovery Park, Lower Eccleshill Road, Darwen, BB3 0RP
Tel: (01254) 819700, Fax: (01254) 819749, Email: richard.bisset@suez.co.uk

Site	Reliance Street - MTR, TLS & HWRC	
Title	Site Permit Boundary Plan	
Scale	1:1000 @ A3	
Date	November 2025	
Drawing Ref	RIs-PER-1125-01	Drawn by JA
		Checked by SW

Figure 2 – Site Receptor Plan



Notes

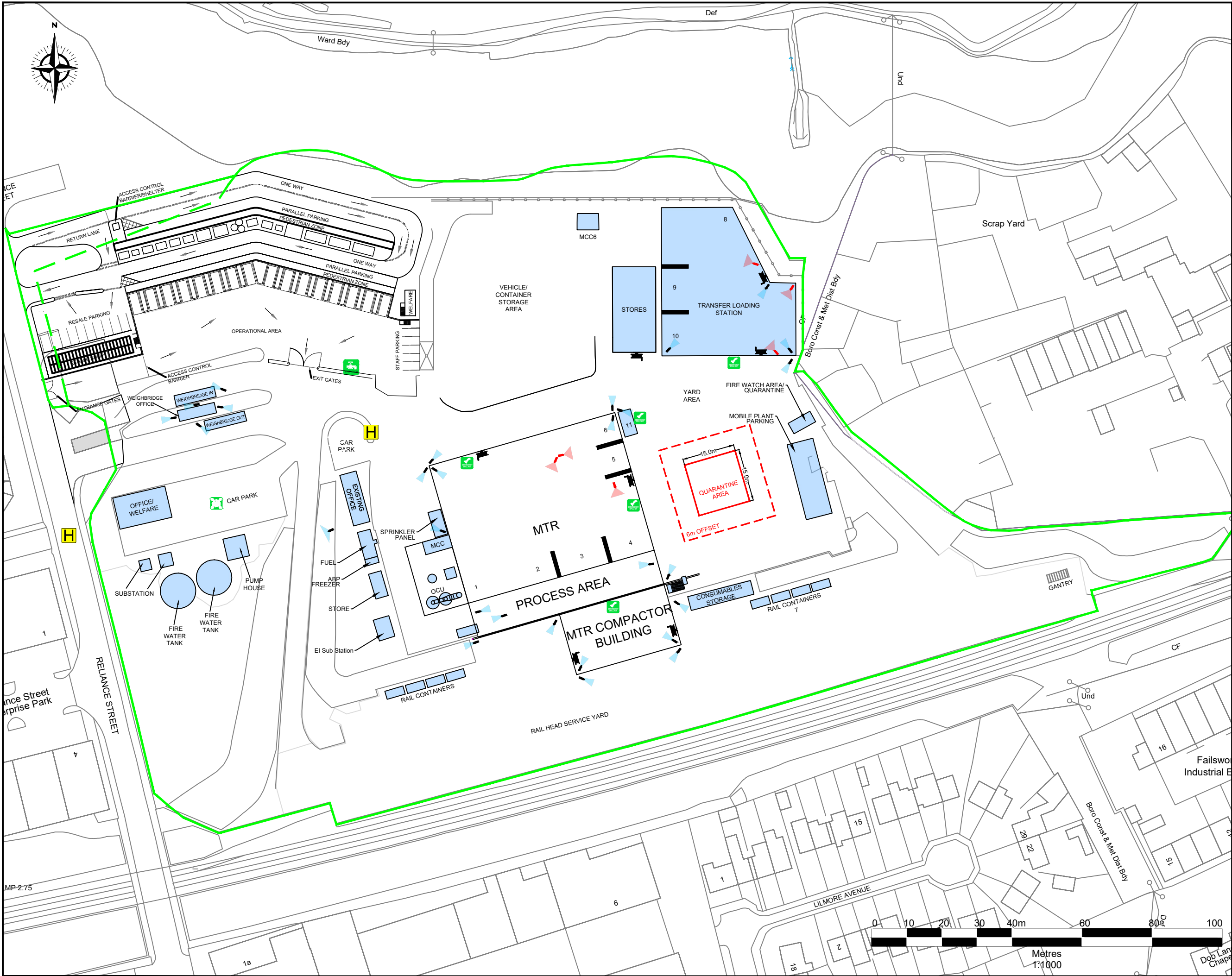
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— Permit Boundary
--- 1km Offset

① Receptors

 Darwen Resource Recovery Park, Lower Eccleshill Road, Darwen, BB3 0RP Tel: 01254 819700, Fax: 01254 819749, Email: richard.bisset@suez.co.uk	Site Reliance Street GMC Title Site Receptor Plan	Scale 1:7,500 @ A3	Drawn by RB	Rev	subject	date
		Date April 2024	Checked by GGD			
		Drawing Ref RIs-REC-0424-01				

Figure 3 – Site Location and Layout Plan



Notes

1. Reproduced from the Ordnance Survey Map with the permission of the Controller of Her Majesty's Stationary Office, Crown Copyright, Licence Number 100004910.

- Current Permit Boundary
- Proposed Permit Boundary
- Hydrant
- Penstock Valves
- Direction of CCTV
- Direction of Thermal Camera
- Hose Reel
- Fire Assembly Point
- Emergency Spill Kit

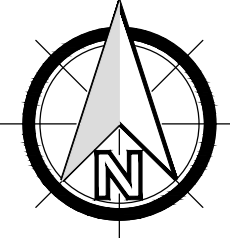
Rev	subject	date



Darwen Resource Recovery Park, Lower Eccleshill Road, Darwen, BB3 0RP
Tel: (01254) 819700, Fax: (01254) 819749, Email: richard.bisset@sita.co.uk

Site Reliance Street - MTR, TLS & HWRC	
Title Site Location and Layout Plan	
Scale 1:1000 @ A3	
Date November 2025	
Drawing Ref RIs-LAY-1125-01	Drawn by JA
	Checked by SW

Figure 4 – Proposed HWRC Layout



- LEGEND
- PROPOSED TARMAC SURFACE
 - PROPOSED PEDESTRIAN AREAS
 - PROPOSED PARKING AREAS
 - PROPOSED ESCAPE LANE
 - PROPOSED SOFT LANDSCAPING AREAS
 - PROPOSED LOWER LEVEL RECYCLING BINS
 - PROPOSED PIERS
 - PROPOSED UPPER LEVEL RECYCLING BINS
 - EXISTING RED LINE BOUNDARY
 - INDICATIVE LAND WITHIN CLIENT OWNERSHIP
 - PROPOSED RETAINING WALL
 - PROPOSED BUILDING

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 - FOR ALL SETTING OUT INFORMATION REFER TO THE ARCHITECT'S DRAWINGS AND DETAILS.
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 - DIMENSIONS MARKED * ARE SUBJECT TO CONFIRMATION BY SITE MEASUREMENT BEFORE CONSTRUCTION PROCEEDS.
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 - ALL DESIGNS, CONNECTIONS, WORKMANSHIP AND MATERIAL ARE TO COMPLY WITH THE CURRENT BUILDING REGULATIONS AND THE LATEST RELEVANT BRITISH STANDARD SPECIFICATION AND CODES OF PRACTICE OR OTHERWISE BE TO THE SPECIFIC WRITTEN APPROVAL OF THE ENGINEER.
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P02	09.07.21	LAYOUT AMENDED TO CLIENT COMMENT	JDP	MH
rev	date	details	drawn	checked



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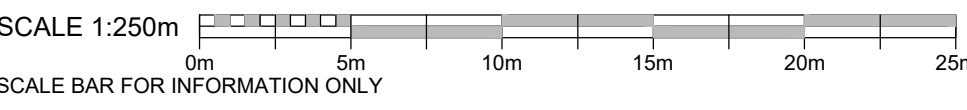
title
EXTERNAL WORKS:
GENERAL ARRANGEMENT

CCL ref:	drawn	design	checked	scale	size	date
216352	GPC	MH	MH	1:250	A1 (L)	29.04.2021

status:
S3 - SUITABLE FOR REVIEW & COMMENT

drawing number	revision
216352-CCL-XX-00-DR-C-4000	P04

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