Dust Management Plan

Unit J Prestwich Industrial Estate

KAS Metal Trading Limited

Unit J Prestwich Industrial Estate
Coal Pit Lane
Atherton
M46 0RY

Prepared by:

Wardell Armstrong LLP

City Quadrant, 11 Waterloo Square, Newcastle Upon Tyne, NE1 4DP

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11 August 2025

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Revision Record

Revision	Date	Prepared By	Checked By	Authorised By
2.0	11 August 2025	A Sharrock	A Cook	C Ridell
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Basis of Report

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Table of Contents

Tables

Figures

Appendices

Drawings

NT17007-002-P0 Site Layout

1.0 Introduction

1.1 General

KAS Metal Trading Limited have commissioned Wardell Armstrong LLP to prepare a permit application for their Metal Trading Facility, Unit J, Prestwich Industrial Estate, Coal Pit Lane, Atherton, M46 0RY.

The facility currently operates under:

- T9 waste exemption: recovering scrap metal;
- S2 waste exemption: storing waste in a secure place; and
- RPS 276 Storing and treating hazardous waste cable.

  There are no changes to the activities that take place on site, other than limited additional waste types, but there are anticipated changes to the exemptions and regulatory position statement (RPS) over the next few months which mean that the operator is seeking a permit in order to remain fully compliant with the legislation in the future.

The site is essentially a metal waste recycling facility that accepts, sorts and bulks scrap metals for onwards transport and trading. It is proposed that the site will also accept large WEEE, excluding fridges, for bulking and onward transportation. WEEE will not be treated onsite.

Metal will be treated physically to reduce the size only, this will be achieved via a hand saw or portable shear (McIntyre 500GT Alligator Shear). This is the only form of treatment on site. This is only undertaken in the building.

This Dust Management Plan has been prepared as part of the Permit application, to show that any dust arising from the site will be appropriately controlled.

The plan will be used in conjunction with other documents that form part of KAS Metal's Environmental Management System to ensure that the activities are managed in a way that prevents or minimises the potential for pollution.

A copy of the document will be held in the site office and will be available to site staff as needed. All staff will receive training so that they are aware of the contents of the plan and of their obligations in preventing pollution caused by dust from the site.

1.2 Site Activities

There will be two activities undertaken on site:

1. Installation to store more than 50 tonnes of hazardous waste;
2. A waste operation to shear, sort and store non-hazardous waste.

The following activities are permitted on the site:

- R4 (Recycling/reclamation of metals and metal compounds);
- R5 (Recycling/reclamation of other inorganic materials);
- R12 (Exchange of wastes for submission to any of the operations numbered R1 to R11);
- R13 (Storage of wastes pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where it is produced));

- D15 (Storage pending any of the operations numbered D1 to D14) incidental to the recycling activity only.

The site layout is shown on drawing KTML.01.02.

The site is not located in an air quality management area (AQMA).

2.0 Sensitive Receptors

The site is located in Atherton, Greater Manchester on an industrial estate that homes other similar operations, including a scrap yard and mechanic directly to the south, a sheet metal contractor to the northwest and a distribution centre to the west.

The area to the east of the facility is mixed residential and commercial. The nearest residential receptors are located 45m east of the site, off Prestwich Street.

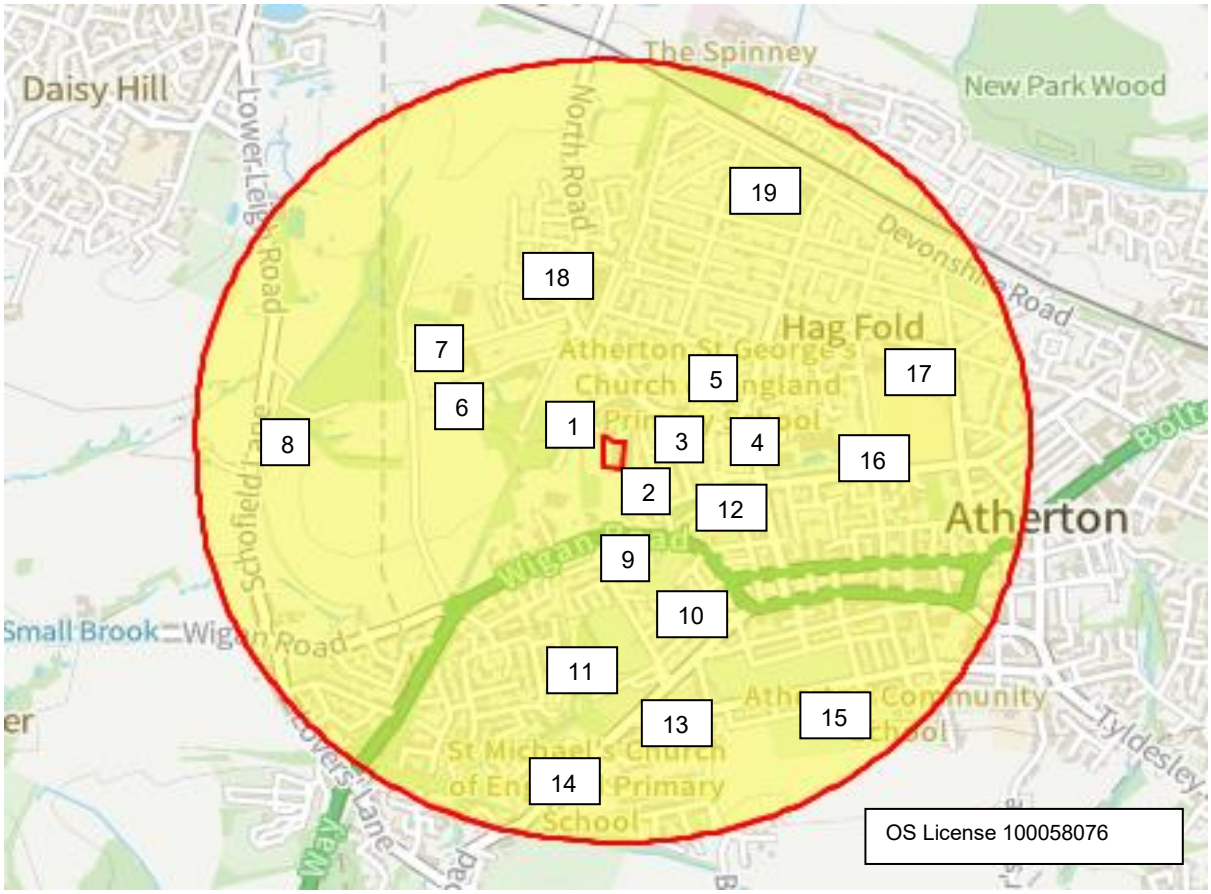
A review using DEFRA's Magic Map Tool found there are no statutory designated sites within 1km of the facility boundary. At greater distance from the site (>1km) is the Pretoria Pit Local Nature Reserve (LNR).

Table 2.1: Sensitive Receptors within 1km of the Site

No.	Receptor	Receptor Type	Distance from Proposed Permit Boundary	Direction from Site	Location Relative to Prevailing Wind
1	Prestwich Industrial Estate	Industrial/Commercial	0m	N, W & S	Upwind
2	Surface water Drain	Ecological	15m	E	Downwind
3	Properties off Prestwich Street	Residential	45m	E	Crosswind
4	St Georges Church	Public	170m	E	Crosswind
5	St Georges Primary School	Public	250m	NE	Crosswind
6	Fairview Caravan Park	Residential	120m	NW	Upwind
7	Atherleigh Business Park	Commercial	270m	NW	Upwind
8	Arondale	Residential	650m	W	Upwind
9	Properties off Wigan Lane	Residential	135m	S	Downwind
10	Petrol Station	Public	200m	S	Downwind
11	Atherton Cemetery	Public	340m	S	Crosswind
12	Collier Brook	Ecological	180m	SE	Downwind
13	Allotment Gardens	Public/Ecological	600m	S	Crosswind
14	St Michaels School	Public	810m	S	Crosswind

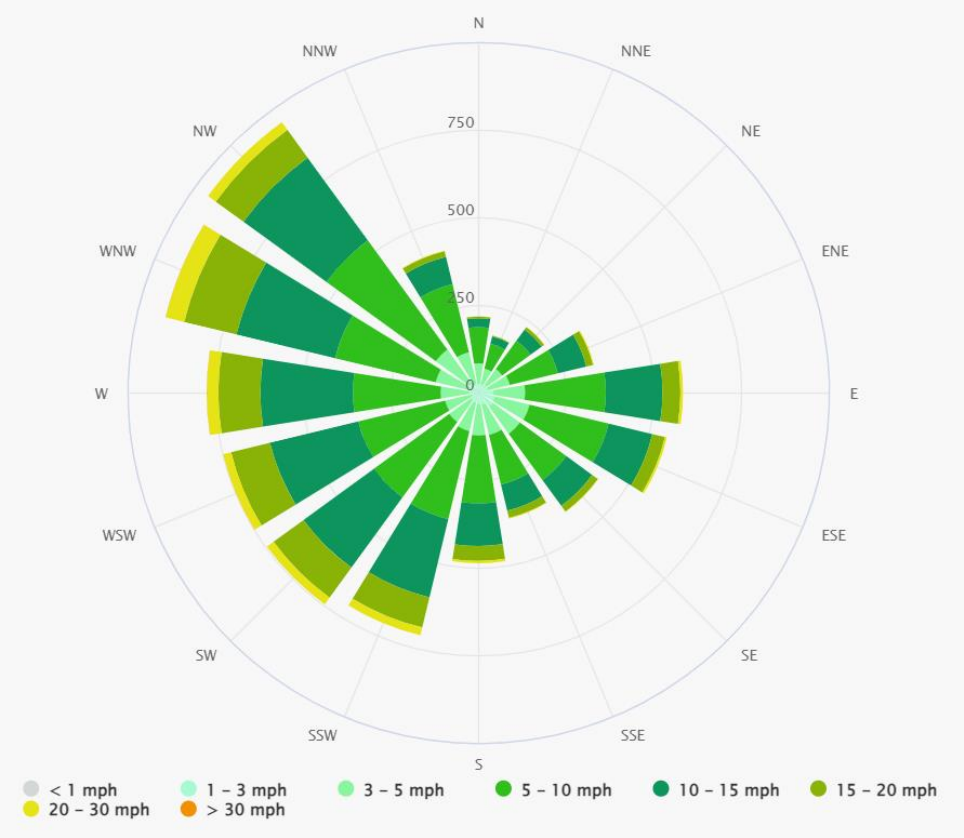
No.	Receptor	Receptor Type	Distance from Proposed Permit Boundary	Direction from Site	Location Relative to Prevailing Wind
15	Atherton High school	Public	840m	SE	Downwind
16	Meadowbank Playing Fields	Public	620m	E	Crosswind
17	Meadowbank & St Richards Schools	Public	720m	E	Crosswind
18	Hagfold Allotment	Public/Ecological	560m	N	Upwind
19	Community Centre and Recreation Ground	Public	670m	N	Crosswind
*Distance to the residential receptor at its closest point has been used as a proxy for the wider residential area at increased distance from the site.					

Figure 1 - Receptor Locations (1km Radius)



Wind statistics have been obtained for the site from Meteoblue[1] which show the prevailing wind to be predominantly from the northwest with a secondary component from the west northwest and west.

Figure 2 - Wind Rose Manchester[1]



3.0 On Site Sources of Dust And Control Measures

It is unlikely that dust will be generated at the site as no dusty waste types will be accepted. There is limited manual treatment of waste undertaken comprising cutting metal to size using a hand saw or portable shear. No other treatment will be undertaken, consequently there is no mechanical sorting, shredding or crushing of waste, the activities most likely to give rise to dust problems.

Cutting of metal will be undertaken in the building so there will be no fugitive emissions from this activity outside the building.

Dust particulates may be present in vehicle exhausts, there will be a no idling policy enforced on site to manage these emissions.

Drop heights from loading and unloading equipment will be minimised to avoid raising dust, however the metal delivered to site will be unlikely to generate dust and is often delivered in bulk bags.

Speed limit of 10 miles per hour on site to minimise dust being raised.

[1]https://www.meteoblue.com/en/weather/historyclimate/climatemodelled/manchester_unitedkingdom_2643123

It will not be possible to manage emissions from all vehicles using the site, which may be owned and operated by third parties. KAS Metals has a preventative maintenance programme and will ensure that their own vehicles and plant are regularly serviced.

3.1 Waste Types

3.1.1 Wastes consisting of powders or dust are not to be accepted at the site

The list of wastes to be accepted and treated at the MRF are set out in Table 3.1, below. The risk of dust generation form all of these waste types is categorised as low.

Table 3.1: Proposed EWC Codes

02	**WASTES FROM AGRICULTURE, HORTICULTURE, AQUACULTURE, FORESTRY, HUNTING AND FISHING, FOOD PREPARATION AND PROCESSING**
02 01	**Wastes from agriculture, horticulture, aquaculture, forestry, hunting and fishing**
02 01 11	Waste metal
15	**WASTE PACKAGING, ABSORBENTS, WIPING CLOTHS, FILTER MATERIALS AND PROTECTIVE CLOTHING NOT OTHERWISE SPECIFIED**
15 01	**packaging (including separately collected municipal packaging waste)**
15 01 04	Metallic packaging
16	**WASTES NOT OTHERWISE SPECIFIED IN THE LIST**
16 01	**end-of-life vehicles from different means of transport (including off-road machinery) and wastes from dismantling of end-of-life vehicles and vehicle maintenance (except 13, 14, 16 06 and 16 08)**
16 01 17	Ferrous metal
16 01 18	non-ferrous metal
16 01 21*	hazardous components other than those mentioned in 16 01 07 to 16 01 11 and 16 01 13 and 16 01 14
16 01 22	components not otherwise specified
16 02	**wastes from electrical and electronic equipment**
16 02 14	discarded equipment other than those mentioned in 16 02 09 to 16 02 13
16 02 15*	hazardous components removed from discarded equipment (WEEE cable)
16 02 16	components removed from discarded equipment other than those mentioned in 16 02 15
16 06	**Batteries and Accumulators**
16 01 01*	lead batteries
16 01 02*	Ni-Cd batteries
16 06 04	Alkaline Batteries (except 16 06 03)
16 06 05	Other batteries and accumulators
17	**CONSTRUCTION AND DEMOLITION WASTES (INCLUDING EXCAVATED SOIL FROM CONTAMINATED SITES)**
17 04	**metals (including their alloys)**

17 04 01	copper, bronze, brass
17 04 02	Aluminum
17 04 03	Lead
17 04 04	Zinc
17 04 05	iron and steel
17 04 06	Tin
17 04 07	mixed metals
17 04 09*	metal waste contaminated with hazardous substances
17 04 10*	cables containing oil, coal tar and other hazardous substances
17 04 11	cables other than those mentioned in 17 04 10
19	**WASTES FROM WASTE MANAGEMENT FACILITIES, OFF-SITE WASTE WATER TREATMENT PLANTS AND PREPARATION OF WATER INTENDED FOR HUMAN CONSUMPTION/INDUSTRIAL USE**
19 01	**wastes from incineration or pyrolysis of waste**
19 01 02	ferrous materials removed from bottom ash
19 10	wastes from shredding of metal-containing wastes
19 10 01	iron and steel waste
19 10 02	non-ferrous waste
19 12	**wastes from the mechanical treatment of waste (for example sorting, crushing, compacting, pelletising) not otherwise specified**
19 12 02	ferrous metal
19 12 03	non-ferrous metal
20	**MUNICIPAL WASTES (HOUSEHOLD WASTE AND SIMILAR COMMERCIAL, INDUSTRIAL AND INSTITUTIONAL WASTES) INCLUDING SEPARATELY COLLECTED FRACTIONS**
20 01	**separately collected fractions (except 15 01)**
20 01 33*	lead batteries
20 01 40	Metals

3.2 Mobile Plant

Plant will be switched off when not in use and will not be allowed to idle.

All mobile plant will be included in the preventative maintenance schedule and will be serviced in accordance with the manufacturer's recommendations to avoid excessive emissions.

Where plant is replaced, the lowest emissions models will be selected where they are equally effective and the cost is not excessive.

3.3 Outloading

Wastes will be loaded onto vehicles and drop heights will be minimised.

Vehicles will be checked before leaving the site and will be cleaned if necessary to minimise dust, mud or debris being tracked onto nearby roads. As the site is concreted as well as the access road it is unlikely there will be generation of dust from the road surfacing.

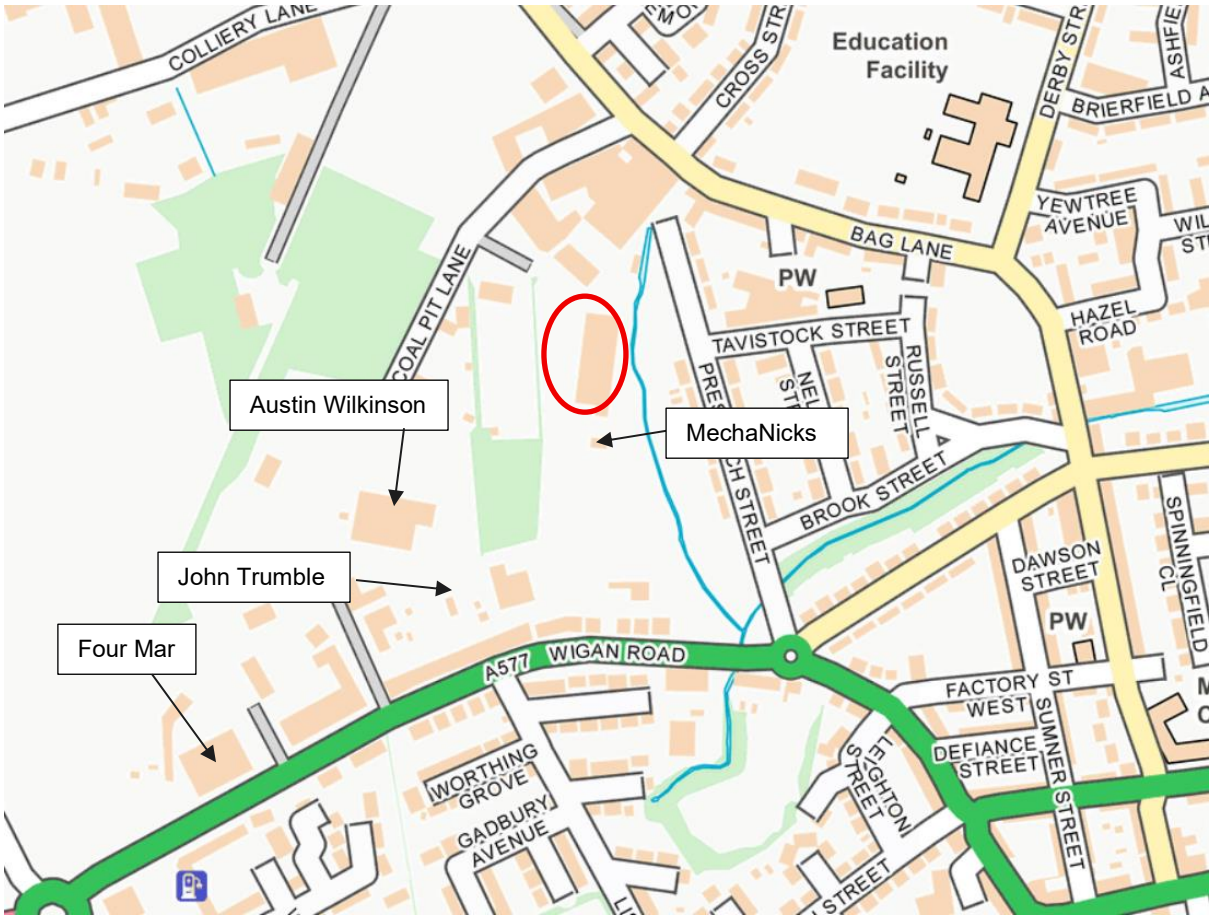
Site surfacing will be properly maintained and will be swept when unacceptable levels of dust dust is observed to limit any build-up of dust.

Speed limit of 10 miles per hour on site to minimise dust being raised.

4.0 Off Site Sources of Dust

There are several industrial units adjacent to the site which may produce emissions of dust. These include mechanics (John Trumble and MechaNicks), a car scrap yard (Gadbury Auto Salvage), a distribution centre (Austin Wilkinson & Sons) and a plastic fabrication company (Four Mar).

Figure 3 – Off Site Sources of Dust



5.0 Dust and Particulate Management

5.1 Implementation of the Dust Management Plan

Implementation of the dust management plan will be the responsibility of the site manager. The Dust Management Plan will form part of the Environmental Management System for the site and compliance will be audited on an annual basis.

This will entail not only a spot check, but records of incidents will be reviewed and the plan will be updated as necessary to address any issues.

The plan will also be reviewed if an ongoing problem is noted with dust, that is, if breaches are regular or frequent.

All staff will be made aware of the Dust Management Plan and their responsibilities to ensure compliance. Refresher training will be given as necessary.

5.2 Sources and Control of Fugitive Dust/Particulate Emissions

Table 5.1, below, sets out the potential sources of dust on site and shows the measures in place to break the source/pathway/receptor linkage and minimise the impact of dust.

Then main method of control is the single activity of metal cutting is undertaken in the building and no dusty wastes are accepted on site. Metal scrap is not considered a likely source of dust.

Water may be used to clean vehicles and for damping down roads if this becomes needed, for example in hot dry weather. The site has a mains water supply.

Table 5.1: Breaking the Source Pathway Receptor Linkage for Dust

Source	Pathway	Receptor	Type of impact	Where relationship can be interrupted
Mud on site roads	tracking dust on wheels and vehicles, then mud dropping off wheels/vehicles when dry	Mud on industrial estate roads immediately adjacent to site entrance.	Visual soiling, also consequent resuspension as airborne particulates	Concrete/tarmac site and entrance road limits potential for dust and mud generation. Entrance road swept if necessary Speed limit in force to avoid raising dust. Damping down with water if needed, e.g. in hot dry weather, e.g. with hose or bowser.
Unloading of waste. Storage and sorting of waste inside buildings (unlikely due to metal wastes not being inherently dusty or subject to degradation)	Escape from buildings and subsequent atmospheric dispersion	Potential impact on local businesses and closest residential	Visual soiling and airborne particulates	The nature of the wastes accepted onsite makes it unlikely that any dust will be generated. If there was to be any dust the building walls and closing of the doors would contain this inside. Waste treatment and sorting is undertaken within the building. Waste is stored in the building or in fully enclosed containers.
Vehicle exhaust emissions	Atmospheric dispersion	Potential impact on playing field, local businesses and closest residential and wildlife receptors	Airborne particulates	Vehicles properly maintained and switched off when not in immediate use. There is a no idling policy on site Models with lower emissions to be considered when replacing vehicles.
Non road going machinery exhaust emissions	Atmospheric dispersion	Potential impact on playing field, local businesses and closest residential and wildlife receptors	Airborne particulates	Compliance with standards for non-road machinery regulations. Plant properly maintained and switched off when not in use. Models with lower emissions to be considered when replacing plant.
Waste treatment (minimal only	Escape from buildings and	Potential impact on playing field, local businesses and	Visual soiling and airborne particulates	All operations take place within a building. The doors will be kept closed as far as practicable.

Source	Pathway	Receptor	Type of impact	Where relationship can be interrupted
cutting to size of metal)	subsequent atmospheric dispersion	closest residential and wildlife receptors		
Build-up of dust around the site	Escape from buildings and subsequent atmospheric dispersion	Potential impact on playing field, local businesses and closest residential and wildlife receptors	Visual soiling and airborne particulates	Good housekeeping with plant, bays and other surfaces cleaned as necessary to prevent major build ups of dust. Whilst unlikely if there is a build-up of dust or mud on the site or access road this will be swept. Sheeted or enclosed vehicles will be used where appropriate. Waste is not inherently dusty and little dust will be generated.

6.0 Visual Dust Monitoring

Dust monitoring will be undertaken throughout the day with staff aware of the need to report any excessive dust so that the cause can be identified and resolved.

Formal monitoring will take place at least once a day with an inspection being made around the front of the building and the external hardstanding outside of the building, along access road and at the site entrance. The finding of this inspection will be recorded in the site log.

Figure 4 – Dust Monitoring Location Plan

Where dust is noted leaving the site or escaping from the building/site this will be recorded and immediately reported to the site manager. Steps will be taken to confirm the source of the dust and take remedial action.

7.0 Reporting and Complaints Response

7.1 Recording Complaints

Contact Should a complaint be received, either from a member of the public or one of the Regulators, this will be recorded on a form prepared for the purpose.

The following information will be recorded:

- contact details of complainant;
- date and time of the incident;
- nature of the incident;
- weather conditions at the time (including wind strength and direction, any precipitation, temperature).

The information will be passed to the site manager or their designated deputy for action.

An investigation will be carried out to determine the activities taking place on site at the time of the incident and the likely cause of the dust emissions.

The site manager, or their deputy, will determine the measures required to prevent further significant emissions and will implement action to resolve the issue. Where necessary, in order to prevent significant emissions of dust, site operations will cease until suitable remedial measures have been put in place.

The complainant will be informed of the outcome of the investigation, the remedial measures proposed and the likely time scale for implementation (unless they have indicated that they do not wish to be contacted). The aim will be to do this within 48 hours (or 72 hours at weekends).

A record of the complaint and the actions taken will be retained on site and these records will be made available to the Environment Agency on request.

7.2 Engagement with the Community

Contact details for the site will be made available via the site noticeboard and the Company website. All complaints will be taken seriously and will be properly recorded and investigated.

7.3 Reporting of Complaints

Where there are consistent complaints regarding dust from the site or where there is a major incident and pollution is known to have occurred or to be likely to occur the Environment Agency will be informed as soon as possible by telephone.

Written reports will subsequently be provided to the Environment Agency in line with the permit conditions.

The complaint log will be reviewed on an annual basis to assess any trends or common issues. Where necessary the Dust Management Plan will be updated as a result and targets for improvement will be put in place.

The Dust Management Plan will also be reviewed following any incidents to ensure lessons learned are taken onboard.

A date will be set for when corrective action should be completed and actions will be reviewed and recorded to demonstrate that improvements have been implemented as required.

8.0 Summary

To summarise, a copy of the Dust Management Plan will be retained on site and will be made available as required to site staff.

The site manager will take responsibility for the implementation of the Plan and will ensure that staff receive initial training and refresher training as required to ensure compliance. The site manager will also review the plan on an annual basis and ensure it is revised as and when required.

The main control for dust is that activities take place inside the building and the waste streams to be accepted are not noted for the propensity to generate dust.

Good housekeeping measures will be in place with site roads and site yard properly maintained and swept if needed, i.e where there is any noticeable build-up of dust or debris. The building and plant will be cleaned regularly where necessary to prevent a build-up of dust.

All plant and equipment will be properly maintained to minimise emissions.

Daily visual monitoring will take place around the site to ensure that there are no visible emissions of dust.

Where significant dust emissions are noted by site staff or where a complaint is received the cause will be investigated and resolved.

Wardell Armstrong LLP

Arabella Sharrock
Principal Waste Permitting Consultant

Charles Ridell
Technical Director

Appendix 1 Housekeeping Log

Dust Management Plan

Unit J Prestwich Industrial Estate

KAS Metal Trading Limited

11 August 2025

SLR

Daily Site Log – KAS Metal Trading Limited Unit J

COTC Attendance				COTC Attendance	
Name:				**Name:**	
Time In:	**Time Out:**			**Time In:**	**Time Out:**
Plant Details	**Inspect**	**Defects**	**Status**		
Type	**Y/N**	**Y/N**	**Op / Unop**	**Person Conducting Inspection**	
Equipment Details	**Inspect**	**Defects**	**Status**		
Type	**Y/N**	**Y/N**	**Op / Unop**	**Person Conducting Inspection**	
Weighbridge					
Weighbridge Indicator, PC & Printer					
Fire Alarms Inspection					
Emergency Lighting Inspection					
CCTV					
Current Weather Conditions					
Weather **Average wind speed** **Gusts** **Comments**					

Daily Site Log – KAS Metal Trading Limited Unit J

Installation Inspection

Weighbridge Operator			**Person Completing Form**		
Name		**Name**			
Signature		**Signature**			
Date		**Date**			
		COTC Holder			**Y / N**

	House Keeping Measure	**Location**	**Freq**	**Inspected Y/N Comments?**	**Compliant Y/N**	**If no, provide comment on non-compliance and action taken**	**Person Inspecting**
1	Removal of Dust	Electrical panels, equipment and surfaces	**Weekly or as Req.**				
2	Sweeping under and around equipment and plant for fugitive litter	Fixed & mobile plant/ equipment	**Weekly or as Req.**				
3	Collection of loose waste	Floor	**Daily**				
4	Removal of Dust (Hot Exhausts)	Plant Exhausts	**Daily**				
5	Inspection of Perimeter	Site boundary	**Daily**				

There must be 2 signatures on document, unless person completing form is also the COTC holder

Appendix 2 Complaints Form

Dust Management Plan

Unit J Prestwich Industrial Estate

KAS Metal Trading Limited

11 August 2025

Complaints Log Form

1. Site details

Site name: Kas Metal Trading Unit J
Site address: Prestwich Industrial Estate, Coal Pit Lane, Atherton, M46 0RY.
Operator name: KAS Metal Trading Limited
Permit number: EPR/

2. Complaints Log

Complaints are received through the site telephone number or via the site email, details of these complaints will be recorded in the below complaints log. The Name and details of the complainant will be recorded along with the date, time and type of complaint (dust, mud, litter or odour etc.)

Table 1 – Complaints log Form

Date & Time	Name of Complainant	Telephone number or e-mail address	Address/ Location of complaint	Type of Complaint	Direction From Site	Distance from Site	Direction of Wind at Time of complaint	Complaint addressed? (provide brief detail of actions taken)

Drawings

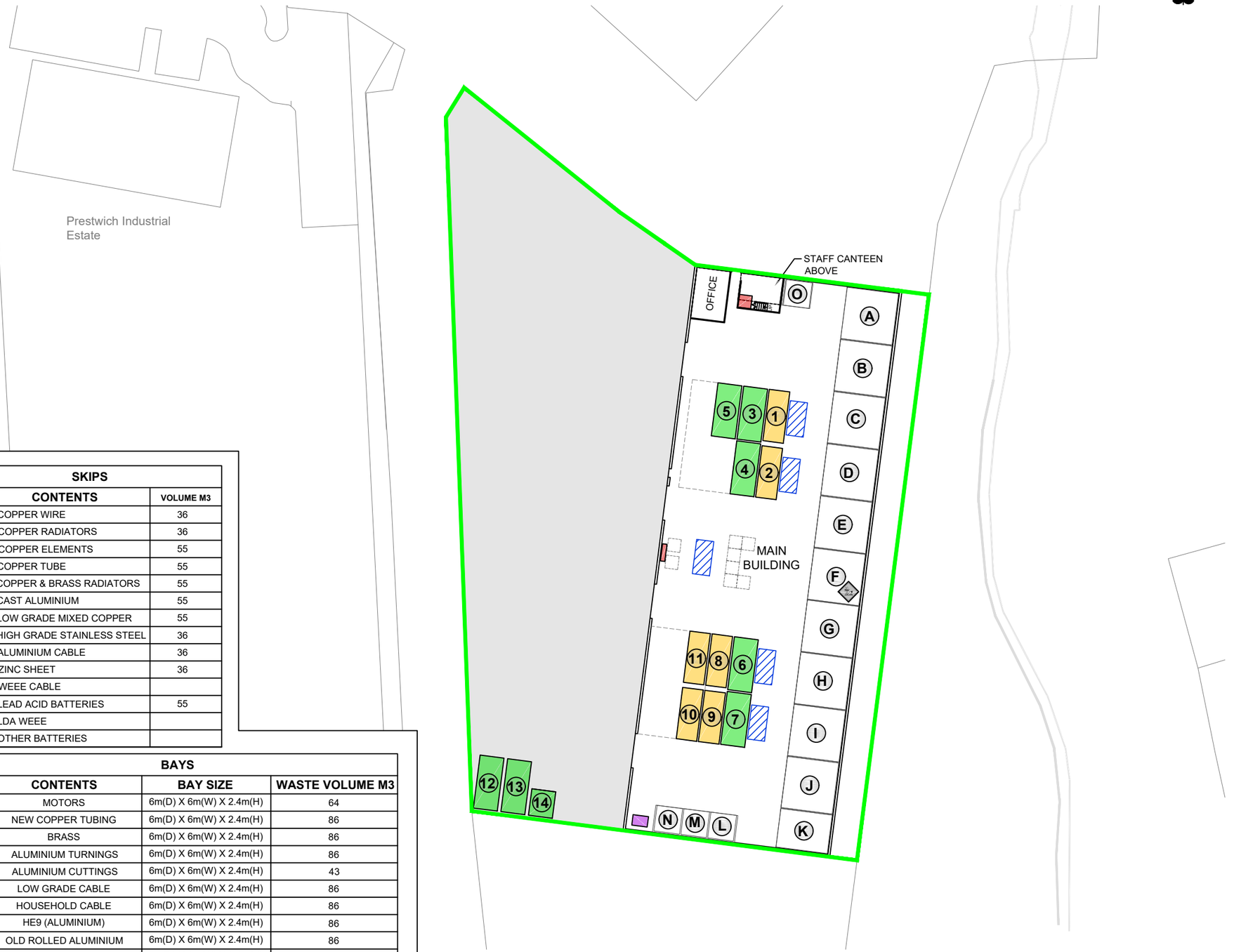
Dust Management Plan

Unit J Prestwich Industrial Estate

KAS Metal Trading Limited

11 August 2025

DO NOT SCALE FROM THIS DRAWING



LEGEND

- ENVIRONMENTAL PERMIT BOUNDARY
- EXTERNAL SURFACING IMPERMEABLE CONCRETE
- 55 YARD SKIP - 6.2m(L) X 2.8m(W) X 3.3m(H)
- 40 YARD SKIP - 6m(L) X 2.4m(W) X 2.5m(H)
- FLAMMABLE LIQUIDS
- DIESEL TANK - 1.8m(L) X 1.22m(W) X 1.22m(H)
- MOBILE PLANT MACHINERY
- PERSISTENT ORGANIC POLLUTANTS

LAYOUT PROVIDED BY ENVIRONMENTAL COMPLIANCE LTD ENTITLED SITE LAYOUT PLAN, DRAWING No.KMTL.01.02-02, DATED 03-11-23

SKIPS

NO.	CONTENTS	VOLUME M3
1	COPPER WIRE	36
2	COPPER RADIATORS	36
3	COPPER ELEMENTS	55
4	COPPER TUBE	55
5	COPPER & BRASS RADIATORS	55
6	CAST ALUMINIUM	55
7	LOW GRADE MIXED COPPER	55
8	HIGH GRADE STAINLESS STEEL	36
9	ALUMINIUM CABLE	36
10	ZINC SHEET	36
11	WEEE CABLE	
12	LEAD ACID BATTERIES	55
13	LDA WEEE	
14	OTHER BATTERIES	

BAYS

ID	CONTENTS	BAY SIZE	WASTE VOLUME M3
A	MOTORS	6m(D) X 6m(W) X 2.4m(H)	64
B	NEW COPPER TUBING	6m(D) X 6m(W) X 2.4m(H)	86
C	BRASS	6m(D) X 6m(W) X 2.4m(H)	86
D	ALUMINIUM TURNINGS	6m(D) X 6m(W) X 2.4m(H)	86
E	ALUMINIUM CUTTINGS	6m(D) X 6m(W) X 2.4m(H)	43
F	LOW GRADE CABLE	6m(D) X 6m(W) X 2.4m(H)	86
G	HOUSEHOLD CABLE	6m(D) X 6m(W) X 2.4m(H)	86
H	HE9 (ALUMINIUM)	6m(D) X 6m(W) X 2.4m(H)	86
I	OLD ROLLED ALUMINIUM	6m(D) X 6m(W) X 2.4m(H)	86
J	MIXED COPPER	6m(D) X 6m(W) X 2.4m(H)	86
K	DRY CU WIRE	6m(D) X 4.5m(W) X 2.4m(H)	17
L	LEAD	3m(D) X 3m(W) X 2.4m(H)	21
M	STAINLESS SOLIDS	3m(D) X 3m(W) X 2.4m(H)	43
N	S&A's	3m(D) X 3m(W) X 2.4m(H)	17
O	GM SOLIDS	3m(D) X 3m(W) X 2.4m(H)	17

REVISION	DETAILS	DATE	DR'N	CHK'D	APP'D

CLIENT: KAS METAL TRADING LTD

PROJECT: ENVIRONMENTAL PERMIT APPLICATION
UNIT 1
ATHERTON, MANCHESTER

DRAWING TITLE: SITE PLAN

PRELIMINARY

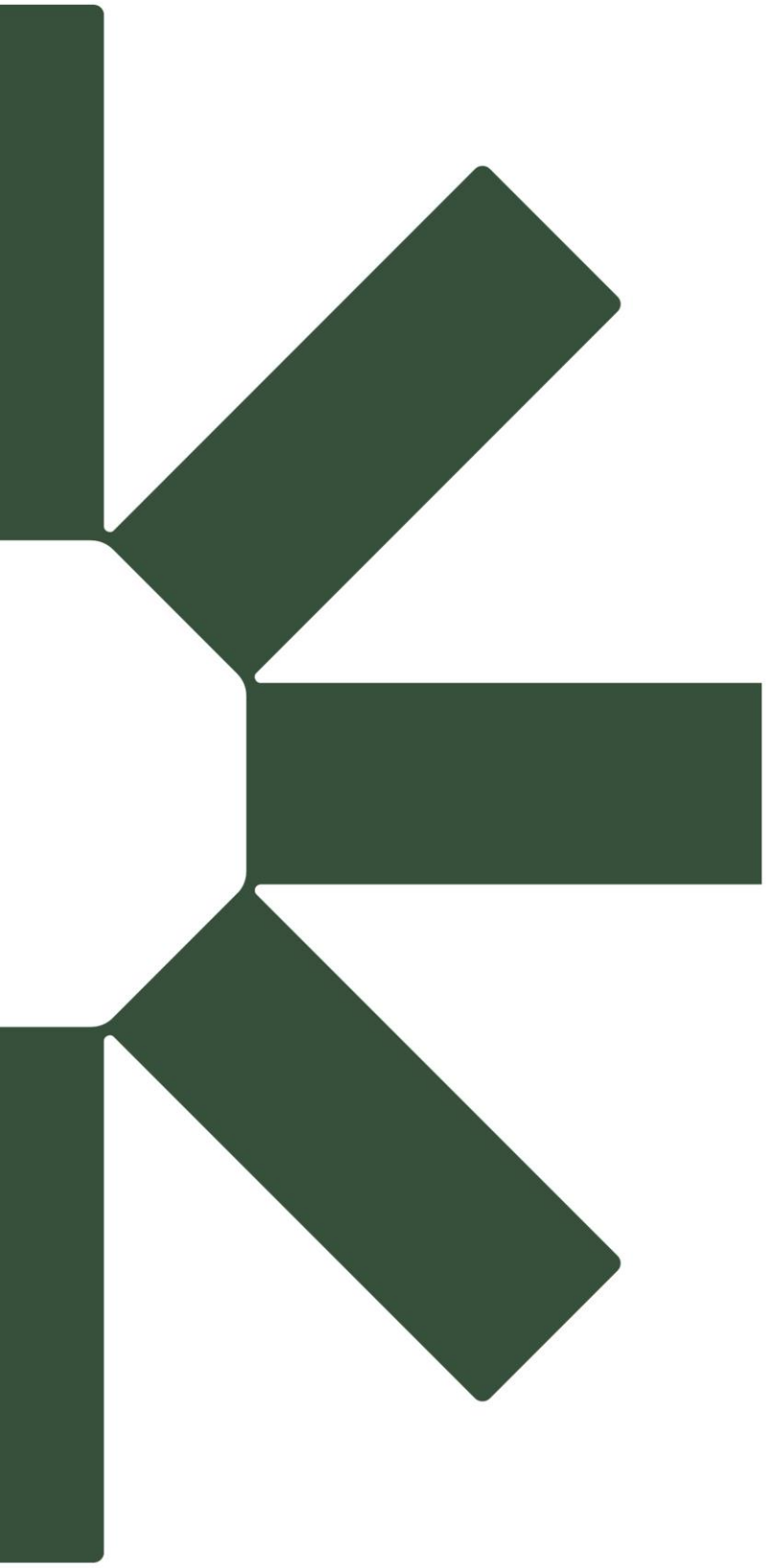
DRG No.	REV	SUIT. CODE
NT17007-002	P0	

DRG SIZE	SCALE	DATE
A3	1:500	18-06-25

DRAWN BY	CHECKED BY	APPROVED BY
DR		

wardell armstrong
PART OF SLR

N:\NT\NT17007 - KAS METAL TRADING COMP SUPPORT\03 - DESIGN\AUTOCAD\NT17007-002-P0 SITE PLAN.DWG



Making Sustainability Happen