



Morgan Sindall Woodchip Storage Facility Odour Management Plan (Version 1, June 2026)

Odour Management Plan for Morgan Sindall Woodchip Storage Facility

1 Introduction

The Site will require an Environmental Permit (EP) to be issued by the Environment Agency (EA) before it can operate. This OMP has been prepared in support of the application for the EP.

The Facility will undertake storage operations only. The only waste type to be accepted under the EP is woodchip.

2 Site Operations

The Facility will have an annual throughput of up to 30,000 tonnes per annum (tpa) of woodchip. Activities on-site include transfer, storage and handling of the woodchip material. There is no treatment of waste undertaken at the Facility. The Facility will store up to 3,500 tonnes of woodchip within the proposed EP boundary.

The Facility would support operations under the neighbouring EPR/HB3337AG permit by storing the woodchip generated from the adjacent (off-site) wood processing activities. The woodchip will be stored on the Site in windrow-style stockpiles pending export via water and road.

Site Layout

The EP boundary and operational layout is illustrated in Drawing 01 provided in Appendix A. The Site comprises:

- Woodchip storage area - located in the northern half of the Site and with surfacing comprising an impermeable pad.

The access point to Site is located on its eastern boundary at NGR TQ 91997 68289, via Lockyer Road.

Hours of Operation

The Facility operates on a 24/7 basis, operations could therefore be undertaken at any time, 7 days-a-week, including public holidays. However, the majority of the scheduled receipt of waste will be between the core operational hours of 06:00 – 22:00.

Receipt of Waste & Storage

The List of Waste (LoW) codes to be accepted under the EP for the woodchip storage are set out in Appendix B. Woodchips would be imported from the adjacent facility to the north using sheeted tractor and trailer units and would consist of the following grades:

- C grade: 8 – 100mm particle size; and
- A grade: 50-100mm particle size.

Duty of care documentation would be checked against incoming waste and if deemed acceptable, permission granted to tip the waste directly into the designated stockpile area.

Woodchips would be stored in windrow style stockpiles in one of four defined stockpiles on an area of impermeable surfacing. There would be a minimum of 6m distance between each stockpile and the Site boundary. Stockpiles will be formed by pushing up the tipped materials with loading shovels into the profile of the windrow style stockpiles. Each stockpile will be up to 120m long and 10m wide. The positioning and set-up of the woodchip windrows will allow plant access to the sides of all piles and as such the rows can be

broken up, turned, moved and monitored effectively. The maximum size of each stockpile is as shown in Table A.

Table A Stockpile Windrow Capacities

Stockpile	Length (m)	Width (m)	Height (m)	Volume (m ³)
1	120	10	4 (at Apex)	2,395.73
2	120	10	4 (at Apex)	2,395.73
3	120	10	4 (at Apex)	2,395.73
4	120	10	4 (at Apex)	2,395.73

Each windrow would have a maximum capacity of 2,395.73m³, with a total of 9,582.92m³ stored on site across the four windrows at any one time.

Woodchip waste would be stored for a maximum duration of 6 months with the Site working on a strict 'First in First out' (FIFO) principle. All woodchip waste is stored on impermeable surfacing. Other areas of the Site are comprised of concrete with a sealed drainage system.

Due to the type of inputs, it is expected the bulk of wastes will be evenly spread throughout the year. The quantity of stored waste will be monitored against the allowed maximum capacities.

Waste Acceptance

All woodchip waste would be sourced from CRL's neighbouring facility. The Site will implement waste acceptance procedures as per details provided within the EMS to check the waste meets the criteria stipulated during waste pre-acceptance.

All vehicles bringing waste material to the Site will report to the Site Office. All wastes will undergo a visual inspection during deposition to confirm its description and composition against the pre-acceptance criteria. Waste will only be stored at the Site if the description in the accompanying documentation is in accordance with the EP and that onsite inspection confirms the waste is consistent with the pre-acceptance criteria. In addition, all relevant storage areas (quarantine, reception and general) at the Site must have the physical capacity needed for the waste to be received. Wastes will not be accepted if this capacity is not available.

As per the EMS, should non-conforming waste be identified, waste would be removed and placed in a designated quarantine area located on the Site prior to removal to a suitably permitted facility. The waste quarantine areas will be clearly marked. A record is kept in the Site Diary of all rejected wastes and all wastes kept in isolation storage.

General Housekeeping

Regular cleaning of the standing areas within the Site is undertaken, in line with the daily inspections. Where required, appropriate remedial and corrective action will be implemented as soon as practicable.

Mitigation of Community Impacts

The following measures are adopted to ensure a 'good neighbour' approach to local residents:

- A phone number for members of the public to contact the Site Management Team will be visible on the Site board at the entrance; and
- Responding to odour complaints promptly and keeping the complainant informed of outcome of investigation (as detailed in Section 5).

3 Site Location & Baseline

The Facility is located at Ridham Docks, Sittingbourne, Kent, centred on National Grid Reference (NGR) 91863 68335. The village of Iwade is located approximately 1.5km southwest of the Facility. The area surrounding the Facility comprises predominantly agricultural / open marshland to the west, with areas of industrial and commercial use to the south, north and east. The Facility is accessed on its eastern boundary via Lockyer Road.

The Swale, a tidal channel of the Thames estuary, is situated 210m to the north of the Facility boundary at its nearest point within Ridham Docks. The Swale is designated as a Ramsar site, Site of Special Scientific Interest (SSSI) and Special Protection Area (SPA) and forms part of Elmley National Nature Reserve (NNR). The Facility borders the Swale SSSI, SPA and Ramsar sites on its western and southern boundaries.

Table B below summarises the surrounding land uses. The location of the Facility is illustrated in **Error! Reference source not found.**

Table B Surrounding Land Uses

Boundary	Description
North	To the north lies industrial/ commercial premises and The Swale which is designated as an SSSI, Ramsar site and SPA. The land beyond this predominantly comprises Elmley NNR.
East	To the east lies industrial/ commercial premises and The Swale which is designated as an SSSI, Ramsar site and SPA. The land beyond this predominantly comprises Elmley NNR.
South	Land to the south of the site predominantly consists of industrial/ commercial premises. Beyond this is the village of Kemsley located approximately 2km south of the Facility.
West	The A249 lies approximately 680m to the west. Land around this largely comprises open / agricultural land, in addition to the village of Iwade which is located approximately 1.5km southwest of the site. The dwellings in Iwade are the closest residential receptors to the site. Swale railway station is located 900m northwest of the Facility.

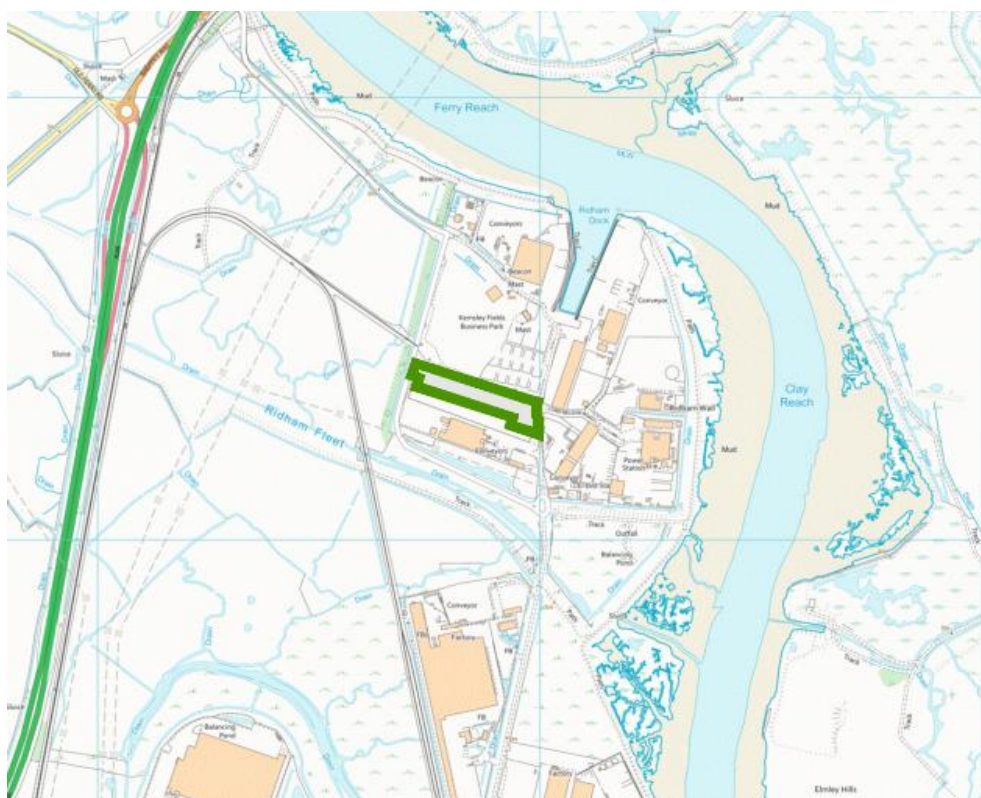


Figure A Site Location

4.. Sources, Release Points and Impact Odour

Odour Sources

The Environmental Management System (EMS) ensures site conditions are monitored to assure on-going compliance with Health, Safety and Environmental Legislation. The EMS is underpinned by an Environmental Risk Assessment and this has identified the following operations as having the potential to give rise to odorous emissions:-

- Delivery of potentially odorous material.
- Discharging of potentially odorous material.
- 'Pushing up / Working' of potentially odorous material.
- Storage of potentially odorous material.
- Loading potentially odorous material.

Potential Odour Sources, Receptors, Pathways and Mitigation Measures

Mitigation Measures are dealt with in Table 1 below:

Source	Receptors	Pathways	Assessment Characteristics	Embedded Mitigation
<i>Delivery /Discharging</i> This activity only occurs during 06:00 – 22:00	Industrial/Commercial areas to the north, east, and west. The closest residential receptors are 1.5km south in the town of Iwade.	Dispersion in the atmosphere to offsite receptors.	Delivery of contaminate waste within the woodchip that may have the potential to generate odour.	Woodchip not meeting specification will be rejected and returned to supplier.
<i>Storage Inc. Pushing Up/ Working Stockpiles</i> This activity only occurs during Daylight hours 06.00 – 22.00.	Industrial/Commercial areas to the north, east, and west. The closest residential receptors are 1.5km south in the town of Iwade.	Dispersion in the atmosphere to offsite receptors.		Inspection & monitoring of stored Woodchip.
<i>Loading</i> This activity only occurs during Daylight hours 06.00 – 22.00.	Industrial/Commercial areas to the north, east, and west. The closest residential receptors are 1.5km south in the town of Iwade.	Dispersion in the atmosphere to offsite receptors.	.	Use of trained and competent operatives to ensure operation is carried out efficiently and effectively.

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Other Potential Sources of Odour

A review of other potential sources of odour in the Facility locale has been undertaken through use of aerial imagery.

CRL operates the neighbouring “Ridham Dock Wood Facility” under Permit reference EPR/HB3337AG, located immediately to the north of the Site. This neighbouring facility operates as a wood treatment facility to accept, chip and store wood and wood chip for both recovery via biomass Combined Heat and Power (CHP) and manufacture of panel board, with a maximum annual throughput of 100,000 tonnes.

The industrial area of Ridham Dock in which the Facility is located is used to import, export and store a wide range of cargo such as wood, steel, grain, aggregate and concrete products and contains various large-scale buildings. The area also hosts a number of industrial land uses including an aggregate facility (Brett Aggregates), a distribution depot (Morrisons), a building material supplier (Knauf), Kemlsey Paper Mill (DS Smith Paper Ltd) and waste management facilities (the wood processing facility operated by CRL to the north), and the facility operated by MVV Environment Ridham.

5. Control Measures

Odour Control – General

All appropriate measures are taken to prevent odorous emissions arising from the storage of Woodchip. It is primarily controlled at source by good operational practice, including physical and management control measures.

As identified in Table 1, the potential odour sources could occur in relation to following activities:

Material Delivery

- Loose/processed woodchip delivered on site is inspected for any potential ‘non-conforming ‘ material and/or odorous material. If the woodchip does not meet pre-agreed specifications, which includes being non-odorous, the load is **rejected** and returned to the supplier.

Storage Inc. ‘Pushing up’ / Working Stockpiles

- Woodchip stored on site will be inspected / monitored in line with the Countrystyle Recycling’s Waste Monitoring and Inspection Procedure.
- Loose / processed woodchip is stored on the permitted area on a hardstanding area consisting of an impermeable surface pending export via vessel. Woodchip material is accumulated in the permitted area in order to obtain the required quantities to fulfil orders. Woodchip is not odorous. If any material becomes odorous during storage, it will be removed to the quarantine area and removed from the site.

Technically Competent Manager

A Technically Competent Manager (**TCM**) will be based on site for the specified time period and will be responsible for ensuring that all compliance requirements are met and in particular:-

- Waste Acceptance and Control Procedures;
- Odour Assessment & Monitoring
- Operational Controls;
- Maintenance requirements;
- Record Keeping;
- Emergency Action Plans;
- Recording and reporting of any incidents, complaints and emergencies.

Maintenance

This document will complement operational procedures to ensure effective control of operations, the use of approved suppliers and contract services, the maintenance of operational equipment and the calibration of monitoring equipment.

All plant equipment will be subject to a programme of planned preventative maintenance which will follow the inspection and maintenance schedule recommended by the manufacturer.

6. Monitoring

General

A thorough monitoring schedule is implemented to assess the following criteria:-

- Process controls;
- Odorous releases;
- Transport through the atmosphere;
- Impacts.

In addition to these criteria and due to the potential for odorous emissions from woodchip material, the following areas are also included in the monitoring schedule:-

- Complaints management;
- Contingency monitoring;
- Site, pathways, and community monitoring undertaken by regulatory authorities;
- Detailed reporting and record keeping.

Monitoring Odorous Releases

- A) For both storage and loading operations, routine subjective (site) assessments are conducted by monitoring personnel at locations within the site boundary
- B) Monitoring personnel will assess the odour present at each monitoring location and the nature/offensiveness of the odour detected will be recorded and compared to previous results for calibration purposes.
- C) The following points will be followed by the **TCM**:-
 - **TCM** will not smoke or consume strongly flavoured food / drink for at least an hour prior to the assessment.
 - The consumption of confectionary and/or soft drinks will be avoided immediately before and during the assessment.
 - Perfumes / deodorants or any other strong scented toiletries will not be applied immediately before or during and assessment.
 - If the **TCM** has a cold, sore throat etc. that inhibits their ability to detect odours then an alternative person will undertake the assessment. Where this is not possible the TCM's condition should be noted in assessment report and site diary.
- D) The **TCM** will walk slowly around the site perimeter breathing normally and then checking odour at identified monitoring locations by standing upwind (if possible) inhaling deeply.
- E) If an odour is detected and indications suggest that it's arising from the site, the **TCM** will continue the assessment trying to trace the odour back to the source. Where an odour is detected and indications suggest that it's arising from an off-site activity then it is reported to the relevant person and appropriate control measures implemented.
- F) On completion of the monitoring activity a record will be made in the site diary.

7. Complaints

In order that the veracity of any odour complaints can be substantiated it is imperative that the site is immediately informed, either by the complainants themselves or by the Environment Agency.

The site telephone number is clearly displayed on the site noticeboard and complainants are encouraged to immediately contact the site office or the EA in the event of any off-site odour being detected that may be attributable to site operations.

Upon receipt of the odour complaint, the details will be recorded on the Site Diary. The report form will provide a checklist to ensure the most relevant and useful information is obtained during the investigation.

All odour complaints will be investigated using all, or a combination of the following information:-

- Information obtained from the complaint source;
- Location;
- Date & Time (in order to establish if it coincides with certain / specific site operations);
- Weather Conditions Inc. Temperature, Wind Direction and Strength;
- Smell, Intensity, Duration, Constant or Intermittent;
- Operating Conditions and operations being undertaken at the time of the alleged odour;
- Any other complaints relating same complaint;
- Any other complaints received previously relating to the site, location, odour, similar operations etc.

Senior management will be informed of all complaints and, where they are validated, any necessary corrective / preventative actions taken in response to the complaint.

All records of complaints will be retained within the EMS and will be available for inspection by EA representatives at any time.

8. Contingency Plan

Due to the nature of the waste handled and the odour measures in place, it is considered unlikely the operation will present any significant odour issues however, the contingency plan outlines the short and long term measures that will be implemented in the event of odour releases (single events or ongoing) as identified in the monitoring programme.

Short Term

- Isolation and / or removal of any odorous materials off-site.
- Increase in inspection activities of stored materials including the operations.
- Increase in inspection frequency of on-site / off-site monitoring points (particularly in weather likely to give rise to odour release).
- Identify supplier of material generating odour emissions and keep record of their deliveries to see if they correspond with any odour release identified during monitoring or any complaints received.

Long Term Measures

- Exclusion of certain suppliers, if deliveries correspond to persistent odour emission and / or complaints received.
- Increase the rate of material turn over.
- Reduction in material being stored on site

9. Odour Management Plan Review

The Odour Management Plan will be reviewed on an annual basis or as and when required due to:-

- Changes in permit conditions.
- Changes to legislation.
- Changes to company policy and procedures.

- Changes to operation that could affect the amount of odour generated.
- Changes to personnel.
- Recommendation from regulatory authorities.
- The number of complaints received.

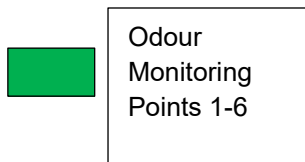
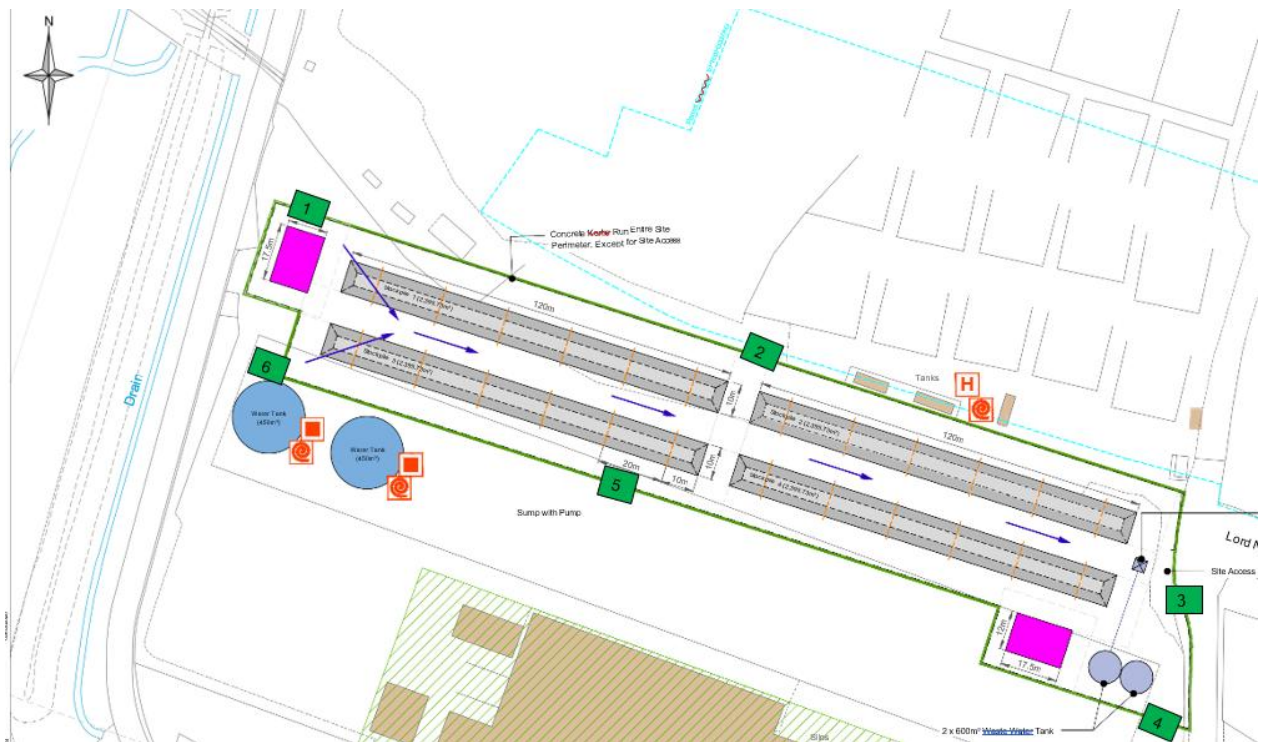
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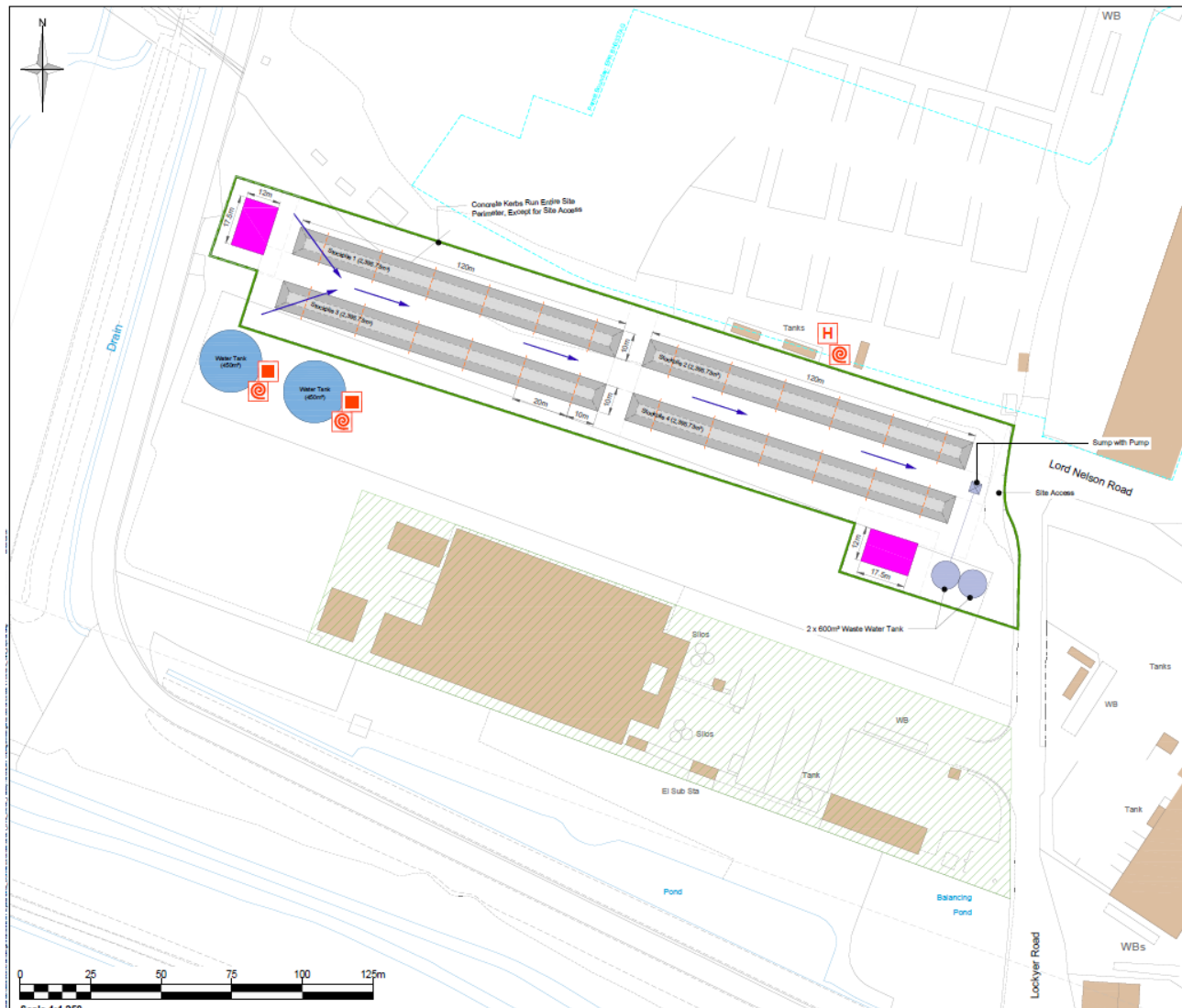
Appendix A Drawings

Odour Monitoring Points Plan

ODOUR MONITORING POINTS



EP boundary and operational layout



Appendix B List of Wastes

LoW Code	Description
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 03	plant-tissue waste (wood and bark only)
02 01 07	wastes from forestry (wood and bark only)
03	WASTES FROM WOOD PROCESSING AND THE PRODUCTION OF PANELS AND FURNITURE, PULP, PAPER AND CARDBOARD
03 01	wastes from wood processing and the production of panels and furniture
03 01 01	waste bark and cork
03 01 05	sawdust, shavings, cuttings, wood, particle board and veneer other than those mentioned in 03 01 04
03 03	wastes from pulp, paper and cardboard production and processing
03 03 01	waste bark and wood
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 03	wooden packaging
17	CONSTRUCTION AND DEMOLITION WASTES (INCLUDING EXCAVATED SOIL FROM CONTAMINATED SITES)
17 02	wood, glass and plastic
17 02 01	Waste wood from construction and demolition
19	WASTES FROM WASTE MANAGEMENT FACILITIES, OFF-SITE WASTE WATER TREATMENT PLANTS AND THE PREPARATION OF WATER INTENDED FOR HUMAN CONSUMPTION AND WATER FOR INDUSTRIAL USE
19 12	wastes from the mechanical treatment of waste (for example sorting, crushing, compacting, pelletising) not otherwise specified
19 12 07	wood other than that mentioned in 19 12 06