



**AC**  
ENVIRONMENTAL  
CONSULTING

# Odour Management Plan



**London Local Skips Ltd**

Eley Road, Enfield, London, N18  
3BB

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## 1. INTRODUCTION

### 1.1 Location

AC Environmental Consulting Ltd, on behalf of London Local Skips Ltd, have prepared an Odour Management Plan (OMP) for the London Local Skips Ltd site located at Eley Road, Enfield, London, N18 3BB.

The site is located on Eley Road, Enfield, London, N18 3BB and is operating as a waste transfer station for household, commercial, and industrial skip waste. London Local Skips Limited seek to obtain a Bespoke Environmental Permit for a waste transfer station for household, commercial, and industrial skip waste. It is important to note that the site is already operating under a Standard Rules permit and need to vary this to bespoke permit, as per the Environment Agency's request following the consolidation of permit types and update of permitting rules. The nearest sensitive residential property lies approximately 528m west on Rays Road. The site is located on an industrial site therefore there are multiple commercial and industrial properties surrounding the site. Access to the site is provided from Eley Road. The site operates as a skip hire and waste transfer station and accepts up to up to 26,000 tonnes per annum of a range of predominantly domestic skip wastes.

### 1.2 Purpose of the OMP

This Odour Management Plan has been developed to manage and mitigate the potential impacts of odour from site operations. It identifies the possible receptors of odour and advises the control measures to put in place that are able to deal with any issues arising. The position of the sensitive receptors is shown in Appendix 4.

Routine monitoring for odour is a central part of the plan and forms part of the Site Inspection Procedure. The response to complaints is key and these shall be dealt with promptly in accordance with the Complaints Procedure. In all cases a review of odour events and complaints shall form part of the ongoing management review and shall be discussed at management meetings.

### 1.3 Implementation of the OMP

This Odour Management Plan is necessary for the London Local Skips Ltd site to effectively control and mitigate the risk of odour occurring from site activities and operations. The Site Manager will be responsible for the implementation of the OMP, and will exercise day-to-day control of the site, either personally or by delegation to suitably trained and responsible staff.

## 1.4 Maintenance and Review of the OMP

Staff at all levels will receive the necessary training and instruction in their duties relating to all operations and the potential sources of odour. Staff are trained on induction and given refresher training at least annually via toolbox talks by the Site Manager.

The OMP will be reviewed annually to ensure it is up to date or following an odour incident caused by the ineffectiveness of the plan. The OMP will also be reviewed in response to an incident.

The audience of this document is the Environment Agency for approval, and the operational staff on site. The document will be made available to the on-site staff and Environment Agency by being stored in the site office and online.

## 1.5 Relevant Sector Guidance on which this OMP is Based

The following guidance and technical standards have been used to construct this OMP:

- Odour Management Plan Template V2 05/05/2021.
- H4 Odour Management Guidance
- Non-hazardous and inert waste: appropriate measures for permitted facilities 12/07/2021.

## 2. POTENTIAL SOURCES

Waste accepted on site will mainly originate from domestic, commercial and industrial customers and will not include single stream food waste, therefore the waste on site is not expected to be odorous. However, due to the variable nature of such wastes, there is the potential for odorous waste to contaminate loads. The potential for odour is linked to the inspection procedure on arrival and the length of storage of wastes on site. The site will accept up to 26,000 tonnes of waste per annum. Daily tonnages will vary but on average this will be around 0-500 tonnes per week.

### 2.1 Odorous Materials Entering and Leaving the Site

Deliveries are made to the site by road only. The frequency of deliveries received will depend on workload and seasonality trends. Due to the site accepting up to 500 tonnes per week, the site will receive up to 15 deliveries per day. The site is located within an industrial estate which is therefore able to accommodate for a high number of deliveries across the estate.

Deliveries are made to site using skip vehicles which are covered with sheets rather than nets at all times aside from the loading and unloading of the vehicles. A driver induction is conducted, and this briefing includes information on odour mitigation. The site will accept deliveries of waste during the permitted operating hours only.

Drivers are required to inspect loads prior to uplift and the checks include load security, potentially odorous wastes, dangerous wastes, and hot loads. If a load is deemed to present a risk, then the driver reports this to site management who will advise the customer that the load cannot be collected and the reasons for that.

Loads are also inspected at the site by site staff prior to tipping. Loads being tipped are also supervised so that any issues which were hidden and not identified prior to tipping can be seen. The aim of this is to ensure that a problematic load is not tipped and allowed to stand for a period of time, potentially allowing odours to accumulate. Loads are inspected to ensure the following criteria is met:

- i) EWC Code on the waste transfer note conforms to the waste inside the container.
- ii) Permit waste acceptance criteria – waste meets with the criteria of the environmental permit and the planning permission for example, waste accepted would be within the permissible tonnage and waste type acceptance criteria.
- iii) The waste is not odorous – waste is likely to be odorous if it has elements of putrescible waste and food residue.

If an issue is identified at the site with non-conforming waste, the load shall be transferred to the quarantine area and site management alerted. Action taken may be to segregate and remove the problematic waste to a secure area or to sort the load, removing acceptable waste to recycling and to invite suitable qualified contractors to collect the problematic waste. It is crucial to note that this waste will not remain on site for a long period of time. The non-conforming waste will be removed from site within 48 hours to a suitable permitted facility. In the event of an odour issue within this time period, the waste will be covered with tarpaulin.

In the event that plasterboard and gypsum waste is identified when sorting through a load on site, site management will be alerted, and the waste will be segregated immediately. Gypsum based waste is low risk in terms of the potential for odour when kept dry and separate. The gypsum waste will be transferred to the assigned 6cyd quarantine skip within the shed pending removal to a suitable permitted facility. It is crucial to note that the site does not accept this type of waste, and the above details a contingency procedure in the event that it makes its way onto site.

A driver induction will be conducted, and this briefing includes information on odour mitigation. Waste will only be accepted on site where the waste has been pre-booked with the office staff. All waste will be visually inspected upon reception to the site in order to ensure that the waste is compliant with the site's permitted waste types and EWC Code description given by the produce/holder as listed on the waste transfer description.

Any wastes that do not comply with the site's permitted waste types shall be reloaded, rejected, and recorded in the rejection log. Any waste that is identified as odorous upon arrival, regardless of it being within the permitted EWC codes, will be reloaded, rejected, and recorded in the rejection log.

In terms of records, Duty of Care notes, Waste Transfer notes are all kept within the office at all times. Additionally, input records consisting of EWC Codes as well as the source and quantity of the waste received will also be kept.

## 2.2 Odorous Materials

Waste accepted on site will mainly originate from domestic, commercial, and industrial customers and will not include single stream food waste, therefore the waste on site is not expected to be odorous. However, due to the variable nature of such wastes, there is the potential for odorous waste and for odours to be the result of contaminants. Further detail on the odour sources is shown in Table 2.1. An identification of the possible sources of odour, pathways taken by odour and receptors affected by odours produced on site have been displayed in Table 2.2. Additional information on the inventory of odorous materials is given in Section 4.1.

Table 2.1 Odour Sources

Parameter	Site Details
Source Description	Domestic, commercial & industrial skip wastes
Odorous Materials	Putrescible waste contamination, green waste, mixed residual waste, contaminated plastic / paper packaging
Potentially odorous EWC codes	02 01 03, 02 01 07, 02 02 03, 02 03 04, 02 05 01, 02 06 01, 02 06 02, 02 07 01, 02 07 02, 02 07 04, 04 01 08, 04 01 09, 15 01 01, 15 01 02, 15 01 04, 15 01 06, 15 01 07, 15 02 03, 16 03 06, 17 03 02, 17 08 02, 19 05 01, 19 05 02, 19 05 03, 19 12 01, 19 12 04, 19 12 05, 19 12 10, 20 01 01, 20 01 02, 20 01 08, 20 01 39, 20 02 01, 20 03 01, 20 03 02
Containment / release point	General
Odour Description	Food waste, green waste, contaminated packaging

Intensity at or near the point of release (0 no detected to 6 extremely strong)	Variable due to weather conditions experienced by the site (0 to 4).
Pattern of release	Expected to peak during waste receipt, other waste activities and during certain weather conditions.
Potential for problems	Equipment failures or excessive waste inputs could result in extended holding times of accepted waste.

Table 2.2 Source-Pathway-Receptor routes

Source	Pathway	Receptor	Type of impact	Where relationship can be interrupted
Storage	Contamination of odorous wastes. Evaporation of odorous chemicals and subsequent atmospheric dispersion.	All	Unpleasant odour for surrounding receptors	Maintain the integrity of the enclosure of stockpiles and skips to prevent odours from escaping.
Unloading and loading	Contamination of odorous wastes. Disruption of odorous chemicals and subsequent atmospheric dispersion.	All	Unpleasant odour for surrounding receptors	Thorough inspection of the waste prior to unloading. Reduce drop heights to reduce the disruption of possible odorous chemicals within the waste.

### 3. RECEPTORS

Detail on the receptors is shown on the sensitive receptor plan Drawing Ref: 230810LLS103 given within Appendix 4.

The site itself is located within a heavily industrialised area, as illustrated by the sensitive receptor plan. Within this drawing, it can be seen that within 1km from the site, the majority of areas are commercial/industrial. This highlights the fact that the site activities are suitable for the area, but also shows that other businesses within the area are accustomed to various activities and operations occurring in close proximity to their own site. Neighbouring businesses consist of the following:

- Scrap metal dealer
- Car body shop
- Vehicle repair
- Construction equipment supplier
- Solid Waste Incineration Plant
- Storage facility

Due to the nature of these surrounding facilities, their general sensitivity will be minimised due to the majority of these sites operating within an enclosed building, with some of them also having an external yard (for parking, or in the case of the scrap metal dealer, for the storage of wastes).

Regardless of the minimised sensitivity and the fact that odour generating from London Local Skips is minor, the site will operate in accordance with the control measures detailed below in section 4. Any odour will not cause exposed community members to be offended, due to the nature of the wastes processed at the site. No food wastes are readily accepted onto the site, with the site accepting general waste from domestic skips. This general waste is then sorted according to the stockpile: hardcore, plastics, plasterboard, timber, ferrous metals, and soils.

## 4. CONTROL MEASURES

The nature of the waste types accepted at the site means that odour is unlikely to become an issue. However, specific control measures will be put into place to minimise the risk of odour becoming an issue. Implementing control measures to minimise the risk of odours arising is the key to odour management. This is done by ensuring site operations are conducted in accordance with the Environmental Management System and procedure SWP015 of the Site Working Procedures Manual.

### 4.1 Managing Inventory

The waste streams accepted on site that have the potential to contain odorous contaminants are displayed in Table 4.1 below. These waste streams consist of green waste, mixed domestic waste, and potential food contaminants on plastic packaging within plastic waste. The daily tonnages of each waste stream are subjective and so approximate tonnages have been given below whilst considering

the other waste streams accepted on site that do not have the potential for odorous contaminants, such as scrap metal. Further detail on potentially odorous contaminants is provided in Table 4.1. Information on odorous material accepted on site is given in Table 4.2.

In the unlikely event that odorous contaminants are identified within the loads accepted on site, they will be separated from the load immediately and transferred to the quarantine area where they will be retained for a maximum of 24 hours pending removal to a suitable permitted facility. The site predominantly accepts domestic mixed skip waste with occasional loads of builder's materials, and therefore the risk of odorous materials being accepted on site is significantly low.

Table 4.1 Potentially odorous material

Odorous and potentially odorous material (any solid, liquid or gas)	Odour potential High Risk / Medium Risk / Low Risk	Maximum time held on site (hours or days)	Location of identified odorous materials on site
Contaminants within green waste	Medium	24 hours	Tipping area, picking line, stockpile bay
Contaminants within mixed domestic waste	High	24 hours	Tipping area, picking line, stockpile bay
Contaminants within plastic waste	Medium	24 hours	Tipping area, picking line, stockpile bay

Table 4.2 Odorous materials

Odorous and potentially odorous material (any solid, liquid or gas)	Odour potential High Risk / Medium Risk / Low Risk	Maximum quantity on site at any given day (cubic meters)	Maximum time held on site	Location of odorous materials on site
General Waste	Medium	30	30 days	External yard bay
Plastics	Medium	30	30 days	External yard bay
Wood	Low	56	30 days	Bay in covered shed

Odour control begins on receipt of loads with each load being inspected on arrival. Waste will be inspected on collection by the driver and on receipt to ensure that the waste meets the following criteria:

- i) EWC Code on the waste transfer note conforms to the waste inside the container.
- ii) Permit waste acceptance criteria – waste meets with the criteria of the environment permit and planning permission for example, waste accepted would be within the permissible tonnage and waste type acceptance criteria.
- iii) The waste is not odorous – waste is likely to be odorous if it has elements of putrescible waste and food residue.

All waste will be visually inspected upon reception to the site in order to ensure that the waste is compliant with the site's permitted waste types and EWC Code description given by the producer/holder as listed on the waste transfer description. Any wastes that do not comply with the site's permitted waste types shall be reloaded, rejected, and recorded in the rejection log.

There will not be any food waste accepted on site and waste entering the site will be mixed domestic, commercial, and industrial skip waste only. In the event that any food waste enters the site, within a mixed load, the food waste will be quarantined immediately and removed from the site within 24 hours. Quarantined material will be stored within the quarantine area as shown on Drawing Ref: 230810LLS101.

The monitoring of incoming waste will be thorough and consistent through the immediate inspection of all loads accepted onto site. Records of any identified odorous contaminants will be kept in the site office at all times, and will be available to the site staff, the Environment Agency and the Local Authority.

## 4.2 Retention Times

The maximum annual throughput and the capacity for storage of wastes indicates that materials can be stored for up to 30 days from receipt.

The permitted area accepts a variety of skip wastes collected from predominantly domestic sources, whilst also collecting waste from builders' activities. Upon arrival, the waste vehicles will drive over the weighbridge to the northwestern area of the site prior to delivering the waste to the tipping area in the shed to the eastern end of the site. The waste will then be immediately sorted and segregated by hand with the assistance of mobile plant including the picking line. Once sorted, the waste will then be transferred to the appropriate stockpile according to waste stream as shown on Drawing Ref: 230810LLS101 and will be stored on site for no longer than 30 days.

The site does not accept hazardous waste, but it is accepted that on occasion hazardous waste e.g. paint tins, batteries etc. may be hidden within a mixed load, so the potential for fire arising from mixtures of wastes or non-conforming wastes, whilst limited, does exist. Non-conforming waste is defined as waste that the site is not permitted to accept.

As stated above, in the event that odorous waste is identified, it will be immediately transferred to the quarantine area and stored on site for a maximum of 24 hours pending removal to a suitable permitted facility for disposal. Additionally, any waste stream considered to be high risk regarding odour potential will be stored on site for a maximum of 24 hours prior to removal as stated within Table 4.2. Due to the nature of the wastes accepted on site, all wastes are low to medium risk. These materials regarding the potential for odour will be stored on site for between 7 – 30 days. Due to the annual throughput and fast turnover, it is expected that waste will be on site for less than 30 days.

In the unlikely event that non-accepting waste is accepted on site, it will be removed from site immediately. If it is not possible for the waste to be removed immediately, it will be stored within the quarantine area for a maximum of 7 days.

### **4.3 Controlling Evaporation**

Reducing the rate of evaporation of odorous chemicals is a valuable control measure in limiting the risk of foul odours being produced on site. It is crucial to note that all waste storage will remain within the shed and the skips or bays in the external yard.

The use of hoses and a mobile mister to dampen stockpiles are not considered as an appropriate measure. The use of such equipment on site will cease if they cause an odour issue.

### **4.4 Containment and Abatement**

There is the potential for odour to be produced from food residue within the waste accepted on site, meaning that completely avoiding odorous air is not feasible, therefore containment methods are necessary to treat the emissions. It is most appropriate to choose containment and treatment methods together to ensure coordinated management of ventilation rates.

Keeping the containment at a local level reduces the volume of odorous air. The immediate removal of food residue if detected during the inspection upon arrival will reduce the exposure time of the potential odour on site. The transfer of the contaminated food residue to the quarantine area will ensure the enclosure of any potential odours and significantly reduce the risk of potential odours spreading offsite to neighbouring properties.

Localised containment or abatement equipment within the shed is not deemed necessary due to the small-scale nature of operations. Potential odours from the waste accepted on site will initially be contained within the tipping area within the shed prior to hand sorting. It is crucial to note that any further sorting using the picking line, despite taking place externally, does not give further rise to odour dispersion due to waste not being entrained in any air stream, so risk of odour generation is limited. It is not deemed necessary for the shed to have fast acting roller shutter doors due to the small-scale nature of the operations and waste storage contained inside, along with the strict housekeeping procedures detailed within Section 4.5.

## 4.5 Housekeeping

### 4.5.1 Skips

Skips and skip vehicles are visually inspected following emptying to ensure that no waste remains in the skip or vehicles. In the event that remaining waste is identified these wastes will be manually removed and the skip shall be cleaned.

### 4.5.2 Bays

Bays will be visually inspected following emptying to ensure that no waste remains. Any remaining waste shall be removed, and the bay shall be cleaned.

### 4.5.3 Processing Plant

The processing plant consisting of the picking line will be visually inspected following emptying to ensure that no waste remains. Any remaining waste shall be removed. Equipment and machinery will be cleaned and disinfected once a week. Further detail on the cleaning schedule is provided within Appendix 5.

### 4.5.4 Site Surfaces

It is crucial to note that all site surfaces are constructed from impermeable concrete and are therefore sealed in the areas within which waste is stored. Site surfaces will be inspected regularly by site management to ensure the concrete remains sealed to prevent absorption of odour producing residues. At the end of each operational day, the area under and around the baler will be cleared of any waste / debris and cleaned. Once the equipment and machinery has been disinfected and cleaned the area below the equipment will also be cleaned once a week.

The drainage systems on site will be treated with bacteria inhibiting solutions. Any spillages will be dealt with immediately using the spill kit that is located in the shed. In the event of a spillage, site management will be notified immediately, and trained staff will deal with the spill in situ using the

spill kit located on site at all times. The spill kit is stored in the shed as shown on Drawing Ref: 230810LLS104.

#### 4.5.5 Areas Containing Odorous Wastes

Areas that have contained odorous waste will be cleaned thoroughly using a jet wash once a week. The jet wash will be equipped with high-pressure low-volume nozzles.

#### 4.5.6 First in / First out Principle

The site operates in strict accordance with the First in / First out procedure (FIFO). The stockpiles in the storage areas according to waste stream operate through the first in first out principle. This can only be achieved with extra attention by site management to ensure full removal of waste from the storage areas once they have reached their maximum volume. Site management will inspect each stockpile daily to ensure FIFO is thoroughly implemented on site. Stockpile levels will be recorded by the COTC holder weekly. The records will be reviewed by site management and action will be taken in the event where stockpiles are not being reduced as planned. This could involve investing in new equipment, hiring new staff, further staff training or changes in the site's current procedures.

#### 4.5.7 Inspections

The site will be inspected once a week by the COTC holder as mentioned above. The site will be inspected at the end of each working day by the site manager which will include a sniff test as detailed in Section 5. The site manager will also undertake an inspection after jet washing or heavy rain, particularly around the stockpiles stored in the 40cyd skips in the external yard to help identify areas where water may have pooled, leading to odour pockets.

#### 4.5.8 Plant and Machinery Maintenance

Plant and machinery will be maintained by the supplier and will be serviced in accordance with the manufacturer's specifications and recommendations with a LOLER being performed annually. Plant will be cleaned down at the end of the working week. Defect checks will be performed daily by the user of the plant machinery and any defects noted will be recorded on the defect form and the repair will be arranged with the supplier.

In the event of a breakdown, either of vehicles, plant or machinery, a contingency process is followed which involves options such as fixing the item internally, covering the broken-down item with a replacement, hiring a supplier to fix the item, and renting additional equipment. If none of these options are suitable, operations may have to cease on site and the relevant affected parties will be contacted immediately with a date of when operations can continue.

If replaced, the item will be replaced with the lowest emissions standard possible at the time of purchase. Both ultra-low and low sulphur fuels are used. Breakdowns will be recorded, and the Environment Agency will be contacted with the nature of the problem and when it is expected for the site to return to normal operations.

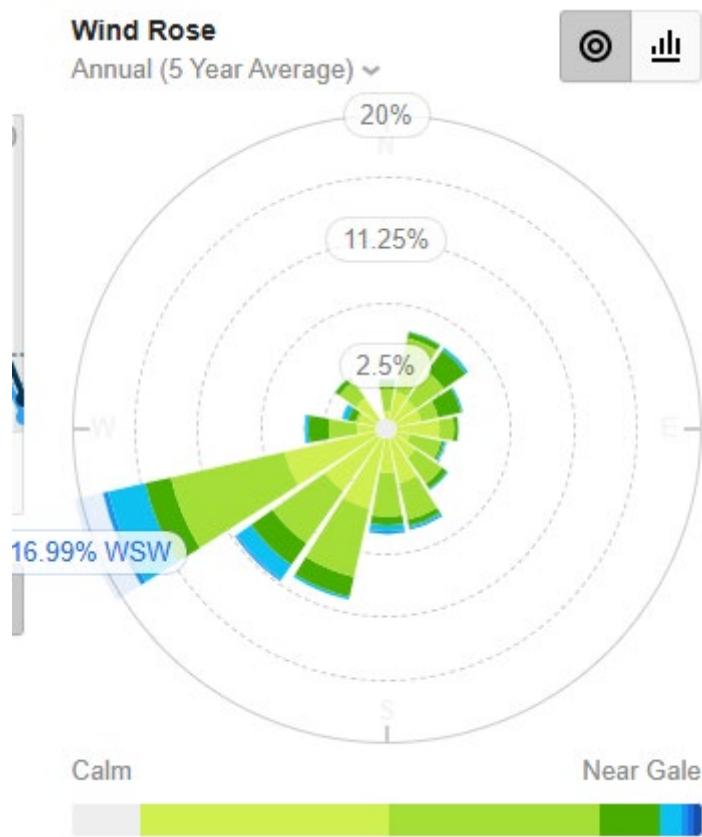
Staff will be trained on induction and are given refresher training at least annually via toolbox talks. Visitor driver inductions are given to inform them of all odour mitigation measures they can undertake. Control measures in place to reduce emissions include the strong enforcement of a ban on idling site vehicles and plant. Control measures in place to reduce emissions include the strong enforcement of a ban on idling plant.

#### 4.6 Transport and Dispersion

Due to the nature of waste accepted on site, the potential for offensive odour is highly unlikely. However, the site design has considered potential impacts on neighbours. The site will be sensitive to the timings of the waste processing, meaning that the site will avoid peak impacts through operating during adverse weather condition such as temperature inversions. In the event of a temperature inversion, the site will not continue to operate. The site will also be considerate of strong winds and monitor whether the prevailing winds are directed towards the nearest sensitive receptors to the northwest during waste deliveries and processing.

A Wind Rose for Upper Edmonton has been obtained. The wind rose indicates prevailing winds from the west-southwest, indicating that any potential odour will be dispersed predominantly to the east-northeast towards the additional commercial and industrial properties beyond.

Figure 3.1 Wind Rose



#### 4.7 Actions in the Event of an Issue

Due to the nature of waste accepted on site, the potential for offensive odour is highly unlikely. However, it is crucial to consider the actions that would be undertaken in the unlikely event that odour becomes an issue. The site has an impermeable concrete surface, therefore making the site easy to sweep and clean in the event of an incident to ensure the risk of odour becoming an issue for nearby receptors remains significantly low.

The site predominantly accepts mixed skip waste from domestic sources, with some loads of builder's materials. The site will not accept any food waste, and therefore the risk of odour becoming an issue is significantly low. However, there are some waste streams that may have the potential to contain odorous contaminants. These site waste streams include timber, mixed domestic waste, and plastic packaging with minimal food residue within plastic waste. It is key to note that any plastic packaging that may have minimal food residue is not accepted as a single waste stream, rather it is accepted that some may enter the site as a low-level contaminant of other wastes.

The site will operate in strict accordance with the following procedures in the event of an accident, emergency and other abnormal events which may result in odour pollution:

- 1) If odorous contaminants are identified upon initial inspection prior to accepting the load on site, the entire load will be rejected.
- 2) If odorous contaminants are identified within a load on site, they will be separated from the load immediately and transferred to the quarantine area for a maximum of 24 hours pending removal to a suitable permitted facility.
- 3) If odorous contaminants cannot be separated from a load, the entire load will be transferred to the quarantine area for a maximum of 24 hours pending removal to a suitable permitted facility.
- 4) Hiring a mobile mister to dampen stockpiles in the event that odour is detected during regular monitoring of stockpiles.
- 5) Hiring a mobile mister to dampen stockpiles in the event that odour arises from stockpiles high temperatures.
- 6) Covering stockpiles with tarpaulin in the event that odour is detected during regular monitoring of stockpiles.
- 7) Covering stockpiles with tarpaulin in the event that odour arises from stockpiles being exposed to high temperatures.
- 8) Use of deodorising chemicals on stockpiles in the unlikely event odour remains an issue following the dampening and covering of stockpiles.
- 9) The concrete surface will ensure that the site can be easily hosed down and swept in accordance with a strict cleaning regime provided within Appendix 5.
- 10) In the unlikely event that odour still remains an issue after implementing the above actions, the site will cease to operate.

The above procedures will be used alongside each other, if necessary, in the event of an odour issue arising to ensure the risk of odour becoming an issue for sensitive receptors remains significantly low.

#### 4.8 Responding to Complaints

All complaints will be recorded in a complaint register, a copy of which is attached in Appendix 2, and reported to the Site Manager, who will investigate the circumstances and ensure that the necessary corrective measures are taken. A prompt response will be made to the complaint and a record, including copies of all correspondence and telephone file notes, will be made in the complaints register. All complaints will be engaged with and responded to directly. Neighbouring businesses will be reassured that any complaints will be dealt with immediately through direct engagement with site management and a follow up phone call once the nature of the complaint has been resolved.

Relevant authorities e.g. London Borough of Enfield and the Environment Agency will be notified by e-mail or phone call on the day that the complaint is made, and will be informed on the identity/location of the complaint, the type of odour and the details of the findings of the London Local Skips Ltd management investigations as regards to the source of the odour and what corrective action has been taken.

If it is necessary to substantiate the odour, a sniff test and walkover will be taken by site management / trained staff. In the event of any substantiated complaint, the effectiveness of the Odour Management Plan will be reviewed.

#### **4.9 Ceasing or Reducing Operations**

Due to the nature of waste accepted on site, it is highly unlikely for offensive odour to be produced, therefore, the need to cease operations is significantly reduced. However, the site will reduce operations in the event of weather conditions or a mechanical failure relating to containment in order to prevent an adverse impact on the surrounding environment and receptors.

#### **4.10 Accident Management Plan**

The odour risk assessment below will guide the action to be taken in response to any odour event. In the first instance the aim will be to remove odour causing materials from the site as soon as possible. In the interim site management shall deploy the existing odour control unit to minimise or eliminate the odour.

Where odours develop from materials already on site through degradation of the waste, the waste shall be removed from site at the earliest possible opportunity and site odour control equipment shall be deployed in the interim.

## 5. MONITORING AND RESPONSE

The following table details the numerous actions that can be taken on site to control the unlikely event of odour, their triggers and who will undertake such actions. Permanent actions in place include maintaining all waste storage within skips, or bays.

Monitoring Method	Trigger	Action	Instigated by
Meteorological	Prevailing winds blowing towards residential housing detected.	On site and off-site sniff test	COTC holder, site management or suitably trained site staff.
Sniff test	Odour detection through sniff test	Checking the integrity of the inspection upon arrival for odorous material. Immediate removal of contaminated waste residue from loads if detected to quarantine area.	Site management
Offsite walk over survey	Odour detection complaint	Checking the integrity of the inspection upon arrival for odorous material. Immediate removal of contaminated waste residue from loads if detected to quarantine area.	Site management

### 5.1 Sniff Tests

Sniff tests will be carried out at the end of each operational day by the site manager in line with the daily inspections of the site. They will also occur after any jet washing activity and heavy rain in order to identify any pools leading to odour pockets. The sniff tests will occur at every stockpile consisting of waste with any level of risk of potential odour. Such wastes are listed in Table 4.1 and 4.2. Therefore,

any potential odours will be identified within an operational day and the odorous waste can be segregated and removed from site within 24 hours.

## 5.2 Walkover

The walkover will be undertaken by site management and will consist of a walkover across the site. The walkover will occur once an odour has been identified by site management during the sniff tests. Site management will patrol the entire site, consisting of an inspection of the stockpiles, site surfaces, vehicles, skips, bays, and processing plant in order to identify the source of the odour. The offsite walkover will be undertaken in response to a complaint from a neighbouring property. Further detail on responding to complaints is provided within Section 4.8.

## Appendix 1 - Sniff Test Form

Odour report form					Date
Time of test					
Location of test e.g. street name etc					
Weather conditions (dry, rain, fog, snow etc):					
Temperature (very warm, warm, mild, cold, or degrees if known)					
Wind strength (none, light, steady, strong, gusting) Use Beaufort scale if known					
Wind direction (e.g. from NE)					
Intensity (see below)					
Duration (of test)					
Constant or intermittent in this period or persistence					
What does it smell like?					
Receptor sensitivity (see below)					
Is the source evident?					
Any other comments or observations					

Sketch a plan of where the tests were taken, the potential source(s).

Intensity	4 Strong odour	Receptor sensitivity
0 No odour	5 Very strong odour	Low (e.g footpath, road)
1 Very faint odour	6 Extremely strong odour	Medium (e.g. industrial or commercial workplaces)
2 Faint odour		High (e.g. housing, pub/hotel etc)
3 Distinct odour	Ref. German Standard VDI 3882, Part 14	

## Appendix 2 - Odour Complaint Report Form

Odour Complaint Report Form		
Time and date of complaint:	Name and address of complainant:	
Telephone number of complainant:		
Date of odour:		
Time of odour:		
Location of odour, if not at above address:		
Weather conditions (i.e., dry, rain, fog, snow):		
Temperature (very warm, warm, mild, cold or degrees if known):		
Wind strength (none, light, steady, strong, gusting):		
Wind direction (eg from NE):		
Complainant's description of odour:		
<ul style="list-style-type: none"> <li><input type="radio"/> What does it smell like?</li> <li><input type="radio"/> Intensity (see below):</li> <li><input type="radio"/> Duration (time):</li> <li><input type="radio"/> Constant or intermittent in this period:</li> <li><input type="radio"/> Does the complainant have any other comments about the odour?</li> </ul>		
Are there any other complaints relating to the installation, or to that location? (either previously or relating to the same exposure):		
Any other relevant information:		
Do you accept that odour likely to be from your activities?		
What was happening on site at the time the odour occurred?		
Operating conditions at time the odour occurred (eg flow rate, pressure at inlet and pressure at outlet):		
Actions taken:		
Form completed by:	Date	Signed

### Intensity

0 No odour	3 Distinct odour	5 Very strong odour
1 Very faint odour	4 Strong odour	6 Extremely strong odour
2 Faint odour		

### Appendix 3 - Odour Diary

Odour Diary					
Name:	Address:				
Telephone Number:					
Date of odour:					
Time of odour:					
Location of odour, if not at above address (indoors, outside):					
Weather conditions (dry, rain, fog, snow etc):					
Temperature (very warm, warm, mild, cold or degrees if known):					
Wind strength (none, light, steady, strong, gusting):					
Wind direction (eg from NE):					
What does it smell like? How unpleasant is it? Do you consider this smell offensive?					
Intensity – How strong was it? (see below 1-5):					
How long did go on for? (time):					
Was it constant or intermittent in this period:					
What do believe the source/cause to be?					
Any actions taken or other comments:					

Intensity

0 No odour	3 Distinct odour	5 Very strong odour
1 Very faint odour	4 Strong odour	6 Extremely strong odour
2 Faint odour		

## APPENDIX 4 – SENSITIVE RECEPTORS

## EDUCATIONAL

1. Bluebells Day Nursery
2. Meridian Angel Primary School
3. West Lea School Meridian Campus

## CARE HOME

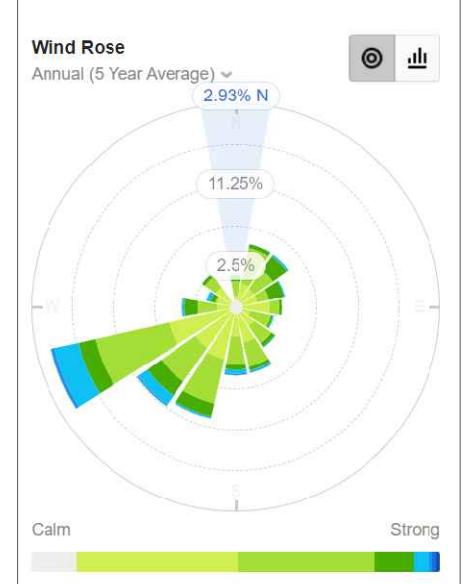
- A. Murrayfield Care Home

## SITES OF SPECIAL SCIENTIFIC INTEREST

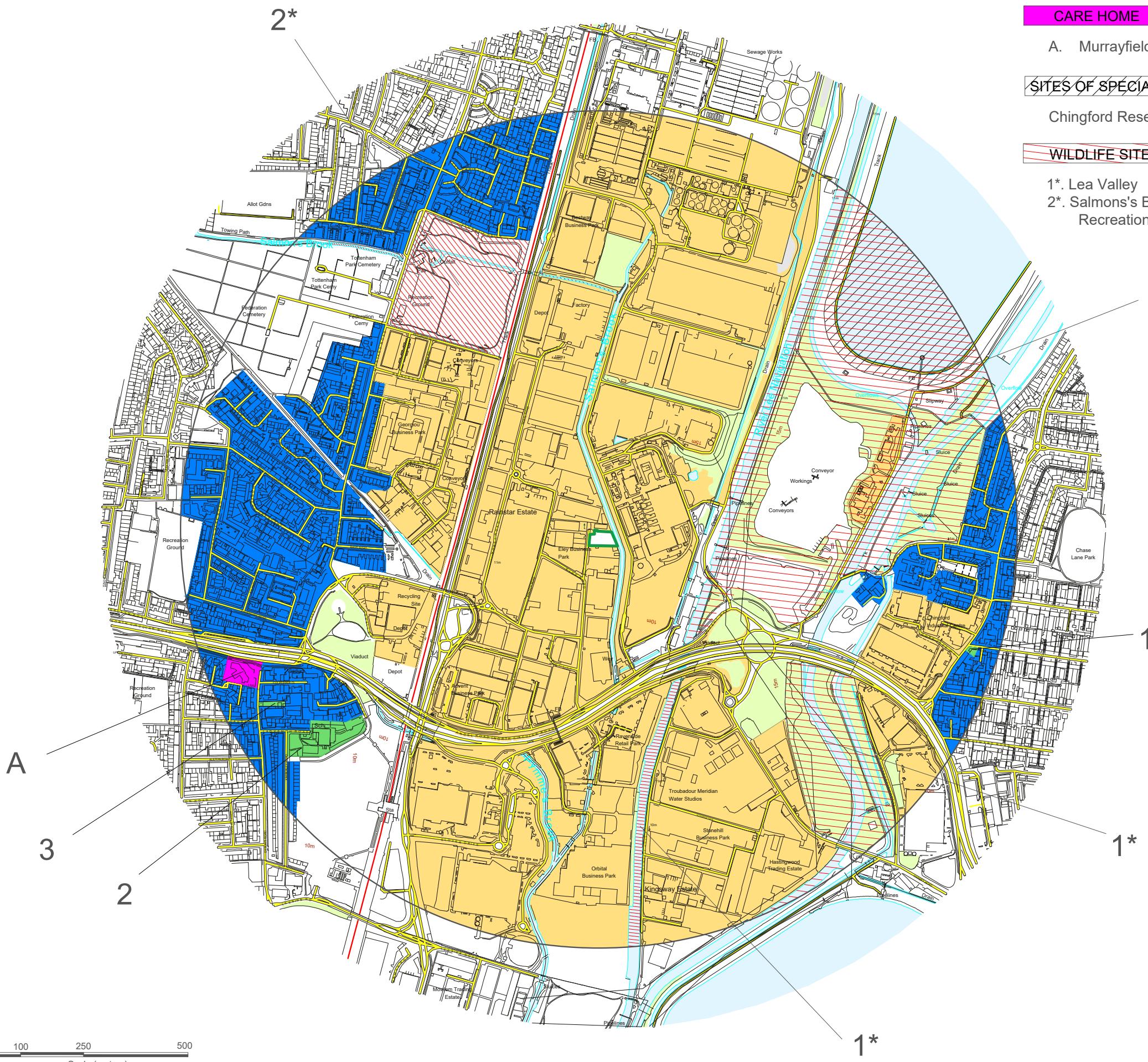
Chingford Reservoirs (SSSI)

## WILDLIFE SITES

- 1\*. Lea Valley
- 2\*. Salmons's Brook & Montague Road Recreation Ground



- █ Residential
- █ Commercial / Industrial
- █ Educational
- █ Care Home
- Road
- Rail



CLIENT  
**London Local Skips Ltd**  
SITE  
Eley Road,  
Enfield, London  
N18 3BB

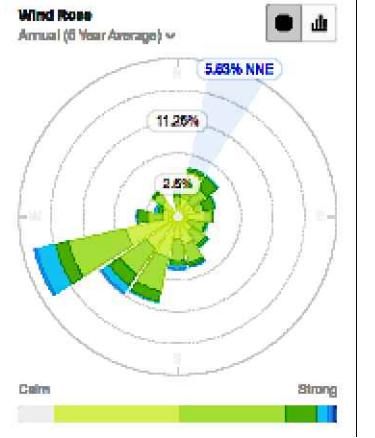
PROJECT			
PERMIT APPLICATION			
TITLE			
KEY RECEPTOR PLAN			
SCALE @A3	DATE	DRAWN BY	CHECKED BY
1:10000	June 2025	T Kearns	D Alcock
DRAWING NO		REVISION	
23081LLS103			
REV	DATE	DETAIL	

## APPENDIX 5 – CLEANING SCHEDULE

Area	How it is cleaned	Frequency
Skips	Jet wash	Upon emptying and after containing odorous materials
Bays	Jet wash	Upon emptying and after containing odorous materials
Processing plant	Disinfected	Weekly
Site surfaces	Jet wash	Daily
Areas containing odorous material	Jet wash	Weekly
Access roads	Jet wash	Daily

APPENDIX 6 – DRAWING REF: 230810LLS101

1. Hardcore -  $7 \times 5 \times 3 = 105\text{m}^3$
2. Plastic - 40cyd Skip =  $30.58\text{m}^3$
3. Plasterboard - 40cyd RoRo =  $30.58\text{m}^3$
4. Timber - 40cyd RoRo =  $30.58\text{m}^3$
5. Fines -  $3 \times 4 \times 3 = 36\text{m}^3$
6. Soil -  $3 \times 4 \times 3 = 36\text{m}^3$
7. Soil -  $3 \times 4 \times 3 = 36\text{m}^3$
8. Ferrous Metals - 40cyd RoRo =  $30.58\text{m}^3$
9. General Waste & Tipping Area =  $16 \times 6.7 \times 3 = 321.6\text{m}^3$
10. Timber - approx  $9.5 \times 10.4 \times 3 = 296.4\text{m}^3$
11. Lithium-ion battery drum filled with vermiculite - 205ltr Steel Drum =  $0.205\text{m}^3$



## Salmons Brook Tributary of the River Lea

