Cowen Road Household Waste Recycling Centre (HWRC)

2.1 Odour Management Plan

September 2025

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Document Details

Document title	Cowen Road HWRC 2.1 Odour Management Plan
Version	1.0
Date	September 2025
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Distribution	SUEZ – Site Copy SUEZ – EIR Department Environment Agency

Document Review History

Date	Description	Summary of Changes
September 2025	Version 1.0	Original document

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1 SITE DESCRIPTION AND GENERAL MANAGEMENT

1.1 Introduction

1.1.1 Cowen Road HWRC ("the Site") is located at Cowen Road, Blaydon, Gateshead, NE21 5TW at National Grid Reference (NGR) NZ 19156 63335, approximately 6km west of the centre of Newcastle upon Tyne.

1.1.1 Gateshead Council ("the Council") holds an Environmental Permit (permit) with the reference ERP/XP3093NK for Cowen Road Waste Reception & Recycling Centre (known as Cowen Road HWRC, "the Site") . SUEZ operates the Household Waste Recycling Centre (HWRC) on behalf of the Council . The Council also utilises the bays in their adjacent depot for the storage and transfer of highways waste, that are within the HWRC permit boundary.

1.1.2 This Odour Management Plan (OMP) is written to support an application to vary the Site's Environmental Permit (permit).

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) comprising quality, environmental and health and safety requirements. The IMS procedures are detailed within the 'Policies and Procedures' section of the SUEZ internal intranet system.

1.1.4 An IMS summary is provided in Appendix A.

1.1.5 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.

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, and in the event that an adverse impact is caused, 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 adopts 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 potential release points of odour are identified and the management systems to prevent and control fugitive odour emissions. Monitoring and reporting systems are described in addition to emergency contingency plans.

2 DESCRIPTION OF WASTE ACTIVITIES

2.1 General Overview

2.1.1 SUEZ operates Cowen Road Household Waste Recycling Centre (HWRC) ("the site") accepting, storing and transferring household wastes, received directly from members of the public. Gateshead Council ("the Council") operates bays for the storage and transfer of its highways waste, which are accessed via the adjacent highways depot.

2.1.1 The following activities and processes are carried out at the facility as a whole:

- Unloading waste
- Manual sorting and separation of waste
- Storing waste
- Loading and unloading waste containers
- RORO container exchange

2.1.2 Treatment undertaken at the site is limited to manual sorting and separation of waste only. The site's annual waste acceptance limit is 71,350 tonnes.

2.1.3 Plans showing the location and indicative layout of the site are shown in Figures 1 and 2.

2.2 Permitted Wastes

2.2.1 The waste types permitted to be accepted at the site are detailed within the Environmental Permit for the site. The list of waste types is included at Appendix B.

2.2.2 The HWRC is designed to receive the following wastes:

- mixed municipal waste
- hard plastic
- cardboard
- green waste
- wood
- soil
- gypsum
- scrap metal
- inert construction waste
- textiles
- gas cylinders
- lead acid batteries
- household batteries
- fluorescent tubes
- co-mingled material
- paper
- cooking oil

- engine oil
- tyres
- fridges and freezers
- WEEE
- hazardous and non-hazardous chemical

2.2.3 Highways waste is accepted by the Council at the adjacent highways depot, including hardcore, asphalt and street cleaning residues. These materials have been generated by the Council in the process of highways maintenance activities only.

2.3 Process Description

2.3.1 Wastes accepted at the HWRC are primarily deposited by the members of the public delivering the waste, with assistance provided by site staff when necessary.

2.1.2 Visiting traffic to the HWRC is directed (via signage) around the site and kept separate from site traffic. Traffic flows in a one-way system around the site. Vehicles are directed to the appropriate skip or container by a site operative.

2.3.2 Wastes stored at the HWRC are primarily stored within roll-on/roll-off (RORO) containers. Full containers are lifted onto vehicles and dispatched from site.

2.3.3 Other wastes stored on the HWRC in dedicated containers (e.g. battery boxes) are lifted into collection vehicles and dispatched from site.

2.3.4 Waste treatment undertaken at the site is limited to manual sorting and separation of waste into different components for disposal or recovery and may also include some light compaction of certain waste streams within containers.

2.3.5 Waste stored in bays at the Highways Depot bays are dispatched from site after being loaded into articulated lorries (or other large haulage vehicles) using the site's loading shovel. The highways depot bays are accessed via a separate entrance to the HWRC, with no public access.

2.1.3 Daily inspections of the recycling centre and operational areas are undertaken to check for leaks & spillages to ensure that all litter and dust/particulate matter generated from activities are contained within the site.

3 SOURCE, PATHWAY, RECEPTORS CHARACTERISATION

3.1 Odour Source

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

3.1.2 This section provides an inventory of all potential odour sources and the odour generating sources at the site.

Local Contributors

3.1.3 The Environment Agency's (EA) public register indicates there are five permitted facilities within 1km of the site that may be considered as local contributors to odour emissions. Details of these facilities are summarised in Table 1 below.

3.1.4 All facilities are operated under separate environmental permits. As such, it is considered that any potential odour emissions from these facilities will be controlled by the conditions of the relevant environmental permits.

Table 1 - Local Contributors

Facility Name	Distance and direction from the Site	Name of Operator	Site Type	Environmental Permit Reference
NWH Waste Services Ltd - Cowen Road	20m South	NWH Group Limited	Household, Commercial & Industrial Waste Transfer Station	EPR/KB3301TN
Chainbridge Road, Blaydon	140m Northwest	Armo Skip Hire Limited	Household, Commercial & Industrial Waste Transfer Station	EPR/BB3533AY
TB Waste Management and Skip Hire Ltd	500m North	TB Waste Management and Skip Hire Ltd	Household, Commercial & Industrial Waste Transfer Station	EPR/KB3905HJ
Blaydon Transfer Station	550m North	Mulberry Waste Limited	Hazardous Waste Transfer Station Temporary Storage Of Haz Waste tonnes - 5.6 A(1) a)	EPR/XP3934YT

Facility Name	Distance and direction from the Site	Name of Operator	Site Type	Environmental Permit Reference
			Disposal Or Recovery Of Haz Waste Involving Blending Or Mixing 5.3 A(1) a) (iii	
Citron Hygiene Newcastle Site	700m Northwest	Citron Hygiene (UK) Limited	Clinical Waste Transfer Station	EPR/ WE8260AA

3.1.5 Local farms and agricultural industry operating within the area are considered to present potential odour emissions from the nature of their operations. These fall out of the control of SUEZ's site operations. Any observations of such activities will be noted in the site diary.

Green Waste

3.1.6 Green waste (EWC 20 02 01) accepted as part of the HWRC will be delivered by members of the public and therefore it is not possible to determine the age of the waste when it arrives on site. Green waste within the HWRC is stored within two 40-yard RoRo containers. A maximum of approximately 30m^3 will be stored within the HWRC at any one time.

3.1.7 Green wastes are only stored on site prior further transport to another site for processing. No processing of green wastes will be undertaken on site.

3.1.8 Green waste will be stored in accordance with the timescales outlined in Table 2 and is considered a medium risk in terms of odour generation.

General Municipal/Residual Black Bag Waste

3.1.9 General municipal waste (EWC 20 03 01) will be delivered to the HWRC by members of the public and therefore it is not possible to determine the age of the waste when it arrived on site. General municipal waste will be stored within two 40-yard Ro-Ro containers and approximately 30m will be stored on site at any one time.

3.1.10 General municipal wastes are only stored on site prior further transport to another site for processing. No processing of this type of wastes will be undertaken on site. General municipal wastes will be stored in accordance with the timescales outlined in Table 2. General municipal waste will contain a certain percentage of putrescible waste, but the odour generation from this source is considered to be medium.

Street Cleaning Residues

3.1.11 Street cleaning residues (EWC 20 03 03) are accepted in the Highways Depot, originating from Gateshead Council's road sweeping activities. Street sweepings are generally made up of leaves, grit,

litter, glass, cans, plastic, with the potential for small quantities of other contaminants such as dog faeces and small dead animals.

3.1.12 The street sweepings are stored in a maximum of two bays of the highways depot, dependent of seasonal demand (i.e. excess leaves in autumn). A maximum of approximately 24m^3 will be stored within the bays at any one time.

3.1.13 Street cleaning residues are only stored on site prior further transport to another site for processing. No processing of residues wastes will be undertaken on site.

3.1.14 Road sweepings will be stored in accordance with the timescales outlined in Table 2 and is considered a medium risk in terms of odour generation.

Recyclable and Bulky Wastes

3.1.15 Dry recyclables and bulky wastes may be lightly contaminated with residual waste, however it is considered that the potential for an odour source is negligible and as such is not discussed further in this OMP.

Table 2 - Source Inventory Odour

Odourous and potentially odourous materials	Odour potential	Maximum quantity on site at any one time	Maximum time on site	Location on Site	Source and age of waste on arrival
Green Waste **EWC codes** 20 02 01	Medium	30m^3	1 week	HWRC - Within 40-yard Ro-Ro containers	Delivered by members of public and therefore it is not possible to determine the age of waste.
General Municipal/ Residual black Bag **EWC codes** 20 03 01	Medium	30m^3	1 week	HWRC - Within 40-yard Ro-Ro containers	Delivered by members of public and therefore it is not possible to determine the age of waste.
Street Cleaning Residues **EWC codes** 20 03 03	Medium	24m^3	1 week	Highways Depot – within 2x bays	Delivered directly from street sweeping vehicles. It is not possible to determine how long waste was on roads prior to sweeping.
Recyclable and Bulky Wastes	The potential for an odour source is negligible and as such is not discussed further in this OMP.				

3.2 Odour Pathway Characterisation

Overview

3.2.1 The principal 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 prevailing wind direction relative to the activity undertaken on site is from the southwest.

Wind Velocity

3.2.5 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

3.2.6 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

3.2.7 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 5.5 below.

3.3 Odour Receptor Characterisation

3.3.1 The Site is located at Cowen Road, Blaydon, Gateshead, NE21 5TW (National Grid Reference (NGR) NZ 19156 63335). Access to the site is located off Cowen Road, adjoining Chain Bridge Road off the A695 (Blaydon Highway). The site is located approximately 6km west of the centre of Newcastle upon Tyne.

3.3.2 Cowen Road HWRC is adjacent on its east boundary to Gateshead Council's Cowen Road Highways Depot. Shibdon Pond Nature Reserve is located 60m east of the permit boundary. Industrial units of the wider industrial estate are located to the north, south & west of the site. The nearest residential

receptors are located 400m southwest on Shibdon Road.

3.3.3 The nearest nature and heritage conservation sites have been screened using Defra's Magic Maps tool (https://magic.defra.gov.uk/magicmap.aspx). The screening identified no designated Ancient Woodland or European Sites within 1km. Shibdon Pond Local Nature Reserve is designated as a SSSI located 300m east of the permit boundary.

3.3.4 Sensitive receptors within 1km of the site have been identified within Table 3 and are shown in Figure 3.

Table 3 – Sensitive Receptors

No.	Receptor Name	Category/Type	Approx. Distance in meters	Direction from Site
0	Groundwater	Water	0	N/A
1	Electricity pylons	Infrastructure	30	N
2	Waste/Recycling site	Industrial commercial	50	NWN
3	Gateshead council	Industrial commercial	30	E
4	Various Industrial buildings	Industrial commercial	85	E/ESE
5	Fuel station	Industrial commercial	365	WSW
6	Blaydon Shopping centre	Commercial	465	W
7	St Cuthberts community hall	Recreation	475	SW
8	Blaydon cemetery	Recreation	500	SSW
9	Playing fields	Open space	350	S
10	Shibdon pond local nature reserve/SSSI	Habitat/open space	60/ 325	SSE
11	Blaydon youth & community centre	Recreation	545	S
12	Blaydon leisure centre	Recreation	850	ESE
13	Derwenthaugh Industrial Estate	Industrial commercial	675	E
14	Various Industrial buildings around Tundry Way	Industrial commercial	850	NNE
15	Various Industrial buildings around Scotswood Road	Industrial commercial	600	NE
16	Blaydon Industrial Park	Industrial commercial	225 - 616	N/NNE
17	B&Q Warehouse	Industrial commercial	910	NNE
18	Various Industrial buildings around Bells Close	Industrial commercial	995	N
19	Various Industrial buildings Newburn Riverside	Industrial commercial	695 - 980	NW
20	Various Industrial buildings around Greenfinch Way	Industrial commercial	880 - 1000	NW
21	Residential properties around Murray Street	Residential	605 - 1000	WSW
22	Residential properties around Shibdon Park	Residential	850 - 1000	SSE

No.	Receptor Name	Category/Type	Approx. Distance in meters	Direction from Site
23	Residential properties around Woodlands Park Drive	Residential	690 - 1000	SSW
24	Residential properties around Western Way	Residential	670 - 1000	SSW
25	Railway line	Transport	60	N
26	A1 road	Transport	275	E
27	A695 Blaydon Highway	Transport	165	N
28	Blaydon West Primary School	Education	740	W
29	Blaydon Station	Transport	620	NW
30	River Tyne	Water course	450	NW
31	Priority Habitat – Lowland Meadows	Habitat	900	NW
32	Priority Habitat – Lowland Fens	Habitat	420	SE
33	Priority Habitat – Reedbeds	Habitat	420	SE
34	Priority Habitat – Lakes	Habitat	510	SE
35	Priority Habitat – Deciduous Woodland	Habitat	150	SE

3.4 Risk Assessment

Odour Source

3.4.1 The odour potential of the putrescible waste stored on site is medium. Green waste and street cleaning residues will be stored in accordance with the timescales outlined in Table 2. Should the situation occur where a load does contain particularly odorous wastes, the waste will be prioritised and will be removed at the earliest opportunity.

Pathways

3.4.2 The prevailing wind direction will determine which receptors will be affected and at what frequency. Meteorological data has been used from Blaydon obtained from www.meteoblue.com which is considered to be representative of conditions within the vicinity of the application site. According to the wind rose data for the area is from the southwest (SW). Areas most at risk from an odorous emission, should it occur, are therefore located northeast of the site which is predominately industrial units.

Receptors

3.4.3 The receptors likely to be most sensitive to an odour nuisance arising from the facility are domestic dwellings or commercial offices.

3.4.4 The nearest domestic properties are located 400m southwest on Shibdon Road, Blaydon, with further

properties located 700m southeast. These receptors are not directly in the path of the prevailing wind direction, so it is considered that these residential areas have a low likelihood of being affected by odour.

3.4.5 In terms of offices, the nearest is Gateshead Council Depot, located adjacent to the southeast boundary of the site. There are further offices dispersed throughout the surrounding industrial estate to the north, south and west of the site. Office units located to the northeast of the site are directly in the path of the prevailing wind direction, so would be the most likely to be impacted by potential odour from the site versus offices in other directions, although the risk will remain low due to control measures implemented at the site.

4 ODOUR MANAGEMENT AND CONTROL

4.1 Waste Acceptance

4.1.1 The site operators will ensure that capacity is available on-site before accepting waste.

4.1.2 Only waste types detailed within the environmental permit will be accepted at the site.

4.1.3 Site staff will identify the types of wastes being brought into site to ensure that only wastes types detailed in the permit are accepted on site. Wastes on site are segregated by waste types in individual containers.

4.1.4 Staff will carry out ongoing visual inspections of the wastes within the containers and bays.

4.1.5 Waste deposition will generally be undertaken by those delivering the waste. Site staff will direct site users to the correct areas.

4.1.6 Should the situation occur where a load with wastes that could cause an odour problem is delivered to site, the waste will be immediately segregated and quarantine procedures will be followed, with the waste removed by the end of the working day. A load rejection form will be completed, and a copy of this form will be kept on site. 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.

4.2 Waste storage

4.2.1 Waste will be stored in accordance with the storage arrangements outlined in Table 2. Should the situation occur where a load does contain particularly odorous wastes, the waste will be removed at the earliest opportunity.

4.3 Waste handling

4.3.1 Material will be delivered and removed from the site as described in Section 2.3 above.

4.3.2 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.

4.4 Housekeeping

4.4.1 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 Daily/Weekly Checklist (Appendix D) or the Vision App. The checklist will be completed by the Site Manager or designated staff and signed off at least weekly by the TCM for the site.

4.4.2 Regular cleaning will be undertaken in the waste storage areas, including floors and bays to ensure the removal of any residues or debris and reduce the potential for odour.

4.4.3 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, as necessary.

4.5 Odour checks

4.5.1 Regular odour checks are carried out to identify any potential odours as detailed in Section 5.2 below. Should any odour be identified, then contingency action shall be followed.

5 MONITORING, REPORTING AND CONTINGENCIES

5.1 Overview

5.1.1 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.

5.1.2 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.

5.1.3 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).

5.2 Monitoring

On/Off-Site Olfactory

5.2.1 The site manager will be responsible for ensuring that daily inspections are made of the site and its perimeter to identify any sources of odour and to establish whether any odours are discernible. Regular odour checks are undertaken on site as detailed below. 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.

5.2.2 Generally, the site supervisor will carry out the daily odour checks. However, in the event of an odour issue, due to the potential for desensitisation to odours, odour monitoring may be carried out by site personnel who do not work closely with handling waste e.g., office staff. These personnel will be the most suitable to detect any fugitive odour outside the site. Routine odour monitoring 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.

5.2.3 Those undertaking odour monitoring 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.

5.2.4 Should staff have been exposed to odours within the facility or any scented products, food or drinks prior to undertaking odour monitoring then they may request that the monitoring is undertaken by someone else. If this is not possible then the assessor may leave site for a period of time (approximately 15 minutes or more) or complete the assessment but ensure that a follow up assessment is carried out after half an hour.

5.2.5 Routine odour monitoring will be undertaken by suitably trained site operatives. Odour monitoring is carried out using sniff testing to check ambient air on or off site.

5.2.6 If a potential odour issue is detected during on-site monitoring, off-site olfactory monitoring 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.

5.2.7 The Vision app will be used to record all odour inspections and assessments.

5.2.8 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

Odour checks

5.2.9 As detailed above, odour checks are undertaken on a daily basis at the site boundary and are recorded on the daily and weekly IMS Checklist (Appendix D) or the Vision App.

5.2.10 Any odours identified must be clearly marked on the inspection record.

5.2.11 Should a distinct odour be identified during a routine odour assessment then an investigation on the source of the odour will be undertaken.

5.2.12 Upon identification of an incident or failure of a control measure, then in consultation with the EIR Manager, the monitoring frequency might be increased to twice daily if necessary.

5.2.13 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.

5.2.14 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.

5.2.15 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.
- Cleaning of storage area.
- Use of an odour suppression system for the dispersal of odour-neutralising or masking agents if required.

5.3 Complaint Management and Reporting

Investigation and Records

5.3.1 Any complaints received at the facility or via the regulatory bodies including the Environment Agency and Local Authority, will be recorded and SUEZ or Gateshead Council will commence an immediate investigation.

5.3.2 All complaints and queries will be logged in accordance with the integrated management system as soon as is practicably possible. All complaints logged will be subject to investigation.

5.3.3 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.

5.3.4 Should the complaint be received out of operational hours then site management shall try to attend site as soon as possible to carry out an investigation dependent upon availability.

5.3.5 The Environment Agency shall be informed of all findings from the investigations so they can relay this back to the complainants where necessary.

5.3.6 Should a complaint be made direct to the site then site management shall carry out a detailed odour assessment at the location of the complaint and on site.

5.3.7 All complaints received by the site are recorded on the amenity complaints log by Site Management and saved for records along with all inspection forms and investigations which are available on site.

Non-Conformances and Complaints

5.3.8 Corrective action procedures are documented in the Non-conformance, Corrective and Preventive Actions section of the IMS. A list of all policies and procedures is included in the Site Management Plan, which forms part of the Environmental Permit.

5.3.9 Each complaint will be reviewed and assessed. If the site is identified as the source of the potential odour nuisance, then an assessment shall be carried out to determine the source of the complaint and then the cause of the odour.

5.3.10 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 odour investigation form.

5.3.11 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).

Odour Complaints and Management Review

5.3.12 All complaints will be investigated immediately by the site management and the EIR Manager including but not limited to a review of the number of complaints, weather conditions, investigations and remediation works. If required, the Site Management Plan and OMP shall be updated to reflect any changes made to the management procedures on site following the review.

5.3.13 Site management and the EIR Manager will review all procedures for the facility 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 Site Management and OMP.

5.3.14 All odour complaints are reported to the EIR Department via the EIR Manager and where applicable communicated to relevant parties within SUEZ as part of the EIR Department's monthly review.

5.4 Means of Contact

5.4.1 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.

5.5 Contingency and Emergency Plans

5.5.1 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 in line with Section 4.1.6.

5.6 Abnormal Events

5.6.1 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

5.6.2 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

5.6.3 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 putrescible waste will have a short residence time (as outlined in Table 1).

Hot Conditions

5.6.4 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

5.6.5 Should the situation occur where a load with wastes that could cause an odour problem is delivered to site, the waste will be removed at the earliest opportunity. A load rejection form will be completed,

and a copy of this form will be kept on site.

5.6.6 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.

5.6.7 The contingency plan in place at the site is discussed in more details in Table 4 below.

Table 4 - 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.
		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 for deliveries and to transfer waste off site	1 day	Address mechanical failure and/or issues 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 Address mechanical failure and/or issues Plant can be hired at short notice from preferred contractor or brought from one of SUEZ's other facilities. Identify alternative long-term storage area

ISSUE	POTENTIAL IMPACT ON SITE OPERATIONS	PERIOD	MITIGATION PLAN
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

5.6.8 SUEZ is experienced in developing contingency plans for other long-term contracts which have worked effectively on previous occasions.

5.6.9 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.

5.6.10 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

5.6.11 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 – Summary of Integrated Management System

Summary of Integrated Management System

Safety, Health, Environment & Quality - IMS

Integrated Management System

- Integrated Policy Statement
- IMS Policy Manual
- Management of Change
- Surface Water Discharges From Waste Facilities.
- Management Roles & Responsibilities
- Fair Culture in Health and Safety
- Process Safety Management

IMS System Procedure

- Risk Assessment & Safe Working Procedures
- Fire Risk Assessment
- Environmental Aspects
- Legal and Other Requirements
- Objectives, Targets & Management Programmes
- Training, Awareness & Competence
- Customer Focus and Related Processes
- Complaints
- Control of Documents
- Assessment and Approval of Suppliers and Contractors
- Communication & Consultation
- Purchasing & Verification of Products and Services
- Accident Investigation & Reporting
- Site Inspection, Audit and Reporting
- Managing Non-Conformance, Corrective & Preventive Action
- Control of Records
- Audits
- Management Review
- H&S Specific Responsibilities

IMS Operational Procedure All Sites

- Duty of Care
- Hazardous Waste Administration
- Persistent Organic Pollutants (POPs) in Soft Furnishings
- Animal By-Products Regulations
- ABPR SUEZ Internal Guidance
- Surface Water Management
- Oil & Fuel Storage

Emergency Preparedness & Response
Serious Incidents Protocol
Critical Incident Communications Procedure
Control of Contractors and Visitors
Service Enquiries & Sales
Control & Operation of Vehicles, Plant & Equipment
Handling & Storage of Hazardous Substances
Avery Weighman
Offices, Premises & Welfare Facilities
Manual Handling
Asbestos Management
Control of Legionella
Lifting Equipment
Use of Abrasive Wheels
Construction Design & Management (CDM)
Provision of First Aid
Working At Height
Work Equipment
Noise
Occupational Health
Zone Access Restriction (Traffic & Pedestrian Management)
Mobile Plant
Radio Communications
Hand Arm Vibration (HAVs)
Lone Working
Control of Ozone and Fluorinated Green House Gases
Transfrontier Shipment of Waste (Notifiable Wastes)
Transfrontier Shipment of Waste (Annex VII/Green List)
Amenity Control and Monitoring
Amenity Complaints
PERNS
Security Shredding and Destruction of Information
Personal Protective Equipment (PPE)
Containment Wall Selection and Management

IMS Activity Specific Requirements

Landfill Safety
Refuse Transfer Station & HWRC Safety
Composting Safety
Waste Collection Safety
MRF and Paper Recycling Safety

- Cleansing Services Safety
- SUEZ recycling and recovery UK Power Safety
- Energy from Waste Plants Safety
- Quarry Safety
- Vehicle & Fabrication Workshops Safety
- Road Gritting & Snow Clearance Safety
- Works On Highways Safety

IMS Production Quality Management

- Materials Acceptance, Sampling & Testing Procedure (Schedule 9A Sites)
- Methodology for Input Sample Collection
- Methodology for Product Sample Collection
- Material Testing Table Methodology
- Customer Review & Validation
- Trading Claims Process

IMS Production Quality Management Wood Processing

- Wood Materials Acceptance Criteria
- Waste Wood Regulatory Position Statements 249 and 250

IMS Radioactive & NORM Waste Disposal

- Clifton Marsh Prior Risk Assessments

IMS Process Safety

- Application of Dangerous Substances and Explosive Atmosphere Regulations (DSEAR)
- Process Hazard Analysis and Review (PHA/R)
- Hazard and Operability (HAZOP) Study
- Structured 'What-If' Technique (SWIFT)
- Access, Lifting and Maintenance Study (ALM)
- Failure Mode and Effect Analysis (FMEA)
- Permit to Work
- Isolation of Energy Sources
- Mechanical Integrity
- Management of Plant and Equipment Change
- Temporary Operating Instruction
- Override Management
- Electrical Safety
- High Voltage rules
- Pre Start-Up Safety Check
- Pre Start-Up Safety Review
- Confined Space

IMS Landfill Energy

- SUEZ recycling and recovery UK G01 Procedure to measure Methane, Carbon Dioxide and Oxygen

SUEZ recycling and recovery UK GWL01 Procedure to measure Groundwater levels
SUEZ recycling and recovery UK S01: Procedure to Sample Raw Waters and Leachate
SUEZ recycling and recovery UK A01 Procedure to measure Methane and Hydrogen Sulphide in Air
L01 Procedure to Measure and Record Leachate Levels
CAL 1 Procedure for the calibration of site testing equipment

Appendix B – Waste Types

Cowen Road Household Waste Reception and Recycling Centre (HWRC)

Appendix A - Permitted Waste Types

WASTE CODE	DESCRIPTION
13	OIL WASTES AND WASTES OF LIQUID FUELS
13 02	Waste engine, gear and lubricating oils
13 02 04*	Mineral-based chlorinated engine, gear and lubricating oils
13 02 05*	Mineral-based non-chlorinated engine, gear and lubricating oils
13 02 06*	Synthetic engine, gear and lubricating oils
13 02 07*	Readily biodegradable engine, gear and lubricating oils
13 02 08*	Other engine, gear and lubricating oils
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 01	Paper and cardboard packaging
15 01 02	Plastic packaging
15 01 03	Wooden packaging
15 01 04	Metallic packaging
15 01 05	Composite packaging
15 01 06	Mixed packaging
15 01 07	Glass packaging
15 01 09	Textile packaging
15 01 10*	Packaging containing residues of or contaminated by dangerous substances
15 01 11*	Metallic packaging containing a dangerous solid porous matrix (for example asbestos), including empty pressure containers
15 02	Absorbents, filter materials, wiping cloths and protective clothing
15 02 02*	Absorbents, filter materials (including oil filters not otherwise specified), wiping cloths, protective clothing contaminated by dangerous substances
15 02 03	Absorbents, filter materials, wiping cloths and protective clothing other than those mentioned in 15 02 02
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 03	End-of-life tyres
16 01 07*	Oil filters

WASTE CODE	DESCRIPTION
16 01 13*	Brake fluids
16 01 14*	Antifreeze fluids containing dangerous substances
16 01 15	Antifreeze fluids other than those mentioned in 16 01 14
16 02	Wastes from electrical and electronic equipment
16 02 11*	Discarded equipment containing chlorofluorocarbons, HCFC, HFC
16 02 13*	Discarded equipment containing hazardous components other than those mentioned in 16 02 09 to 16 02 12
16 02 15*	Hazardous components removed from discarded equipment
16 05	Gases in pressure containers and discarded chemicals
16 05 04*	Gases in pressure containers (including halons) containing dangerous substances
16 05 05	Gases in pressure containers other than those mentioned in 16 05 04
16 05 07*	Discarded inorganic chemicals consisting of or containing dangerous substances
16 05 08*	Discarded organic chemicals consisting of or containing dangerous substances
16 06	Batteries and accumulators
16 06 01*	Lead batteries
16 06 02*	Ni-Cd batteries
16 06 03*	Mercury-containing 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 01	Concrete, bricks, tiles and ceramics
17 01 01	Concrete
17 01 02	Bricks
17 01 03	Tiles and ceramics
17 01 07	Mixtures of concrete, bricks, tiles and ceramics other than those mentioned in 17 01 06
17 02	Wood, glass and plastic
17 02 01	Wood
17 02 02	Glass
17 02 03	Plastic
17 03	Bituminous mixtures, coal tar and tarred products
17 03 02	Bituminous mixtures other than those mentioned in 17 03 01

WASTE CODE	DESCRIPTION
17 04	Metals (including their alloys)
17 04 01	Copper, bronze, brass
17 04 02	Aluminium
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 11	Cables other than those mentioned in 17 04 10
17 05	Soil (including excavated soil from contaminated sites), stones and dredging spoil
17 05 04	Soil and stones other than those mentioned in 17 05 03
17 06	Insulation materials and asbestos-containing construction materials
17 06 04	Insulation materials other than those mentioned in 17 06 01 and 17 06 03
17 08	Gypsum-based construction material
17 08 02	Gypsum-based construction materials other than those mentioned in 17 08 01
17 09	Other construction and demolition wastes
17 09 04	Mixed construction and demolition wastes other than those mentioned in 17 09 01, 17 09 02 and 17 09 03
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 01	Paper and cardboard
20 01 02	Glass
20 01 08	Biodegradable kitchen and canteen waste
20 01 10	Clothes
20 01 11	Textiles
20 01 13*	Solvents
20 01 14*	Acids
20 01 15*	Alkalines
20 01 17*	Photochemicals
20 01 19*	Pesticides
20 01 21*	Fluorescent tubes and other mercury containing waste

WASTE CODE	DESCRIPTION
20 01 23*	Discarded equipment containing chlorofluorocarbons
20 01 25	Edible oil and fat
20 01 26*	Oil and fat other than those mentioned in 20 01 25
20 01 27*	Paint, inks, adhesives and resins containing dangerous substances
20 01 28	Paint, ink, adhesives and resins other than those mentioned in 20 01 27
20 01 29*	Detergents containing dangerous substances
20 01 30	Detergents other than those mentioned in 20 01 29
20 01 33*	Batteries and accumulators included in 16 06 01, 16 06 02 or 16 06 03 and unsorted batteries and accumulators containing these batteries
20 01 34	Batteries and accumulators other than those mentioned in 20 01 33
20 01 35*	Discarded electrical equipment and electronic equipment other than those mentioned in 20 01 21 and 20 01 23 containing hazardous components
20 01 36	Discarded electrical and electronic equipment other than those mentioned in 20 01 21, 20 01 23 and 20 01 35
20 01 37*	Wood containing dangerous substances
20 01 38	Wood other than that mentioned in 20 01 37
20 01 39	Plastics
20 01 40	Metals
20 01 41	Wastes from chimney sweeping
20 01 99	Waste coffee pods
20 02	Garden and park wastes (including cemetery waste)
20 02 01	Biodegradable waste
20 02 02	Soil and stones
20 02 03	Other non-biodegradable wastes
20 03	Other municipal wastes
20 03 01	Mixed municipal waste
20 03 03	Street-cleaning residues
20 03 07	Bulky waste

Appendix C – Detailed Odour Assessment Form

Odour Investigation - Detailed Assesment 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 D – Indicative Daily/Weekly Checklist

DAILY/WEEKLY INSPECTION CHECKLIST

Version 3 30th March 2016

Site: _____

Week Commencing: _____

TCM Minimum Attendance Required: _____

TCM Attendance (hours/week): _____

	Inspected Items	Frequency	Mon	Tue	Wed	Thur	Fri	Sat	Sun	TCM Weekly Audit	Date CAR raised
	Person Completing the Checklist	Daily Initials									
	All Facilities										
1	Condition of Site ID Board & Signs	Weekly									
2	Condition of Access, Site Road & Hardstanding	Weekly									
3	Condition of Waste Reception Area & Operational area	Weekly									
4	Site Building & Welfare	Weekly									
5	Condition of Interceptors	Weekly		External Checked/Emptied - Yes / No							
6	Waste Type, Quantities & Storage	Daily									
7	Waste Acceptance / Inspection & Duty of Care	Daily									
8	Condition of Fencing, Gates & Security	Daily									
9	Condition of ALL Waste Containers, on shared sites this includes any containers left by Logistics	Daily									
10	Condition of Lighting System	Daily									
11	Condition of fuel & storage tanks, inc containment systems	Daily									
12	Condition and stability of all steps, including mobile steps on CRCs	Daily									
13	Other liquid storage; Availability of spillage kit	Daily									
14	Fire; Availablility of emergency equipment (inc vehicles)	Daily									
15	Surface Water Management e.g. Drainage System	Daily									
16	Control of Litter inc. fly tipping	Daily									
17	Control of Odour - Morning check - ✓ if no odour, x if odour and investigate with details on reverse	Once / Twice Daily as appropriate									
18	**ADDITIONAL CHECK TO BE IMPLEMENTED IF ODOUR COMPLAINT RECEIVED AND CONTINUED FOR 1 MONTH AFTER LAST COMPLAINT** Control of Odour - Afternoon check- ✓ if no odour, x if odour and investigate with details on reverse										
19	Odour supression system operating satisfactorily	Daily									
20	Control of Dust	Daily									
21	Control of Noise	Daily									
22	Control of Birds and Rats	Daily									
23	Control of Flies (* record spraying and any problem loads on reverse)	Daily									
24	Control of Mud / Debris on Road & Wheelwash	Daily									
25	Food Waste - Is food waste being stored safely in designated areas and are all containers labelled and sealed.	Daily									
26	Have any inspections occurred (e.g. Regulator) or samples taken (e.g. discharge monitoring). If Regulator scores received, ensure logged on COMPAS as manual CAR	As Inspected									
27	Weather station operating satisfactorily	Daily									
28	Emergency testing of tank floats/alarms	Monthly									

Carbon Trust Accreditation (please record your information on the 1st working day of each month) DATE:

For those sites with energy meters	Gas	Electricity
Monthly Meter Reading		
Monthly Meter Consumption		
YTD Consumption		
Annual Verification of Supplier		

✓ **= Satisfactory; X = Unsatisfactory; NI = Not Inspected; NA = Not Applicable**

Note:

1 Checklists should be comleted at the end of each day, please refer to IMS 2.12 and IMS 3.35 for guidance

2 If the unsatisfactory condition is minor and resolved the same day, remedial action / comments to be recorded over page. Otherwise Manual Corrective Action Request (CAR) should be raised with CAR reference recorded in right hand column.

CoTC / TCM Signature: _____ Date: _____

DAILY/WEEKLY INSPECTION CHECKLIST

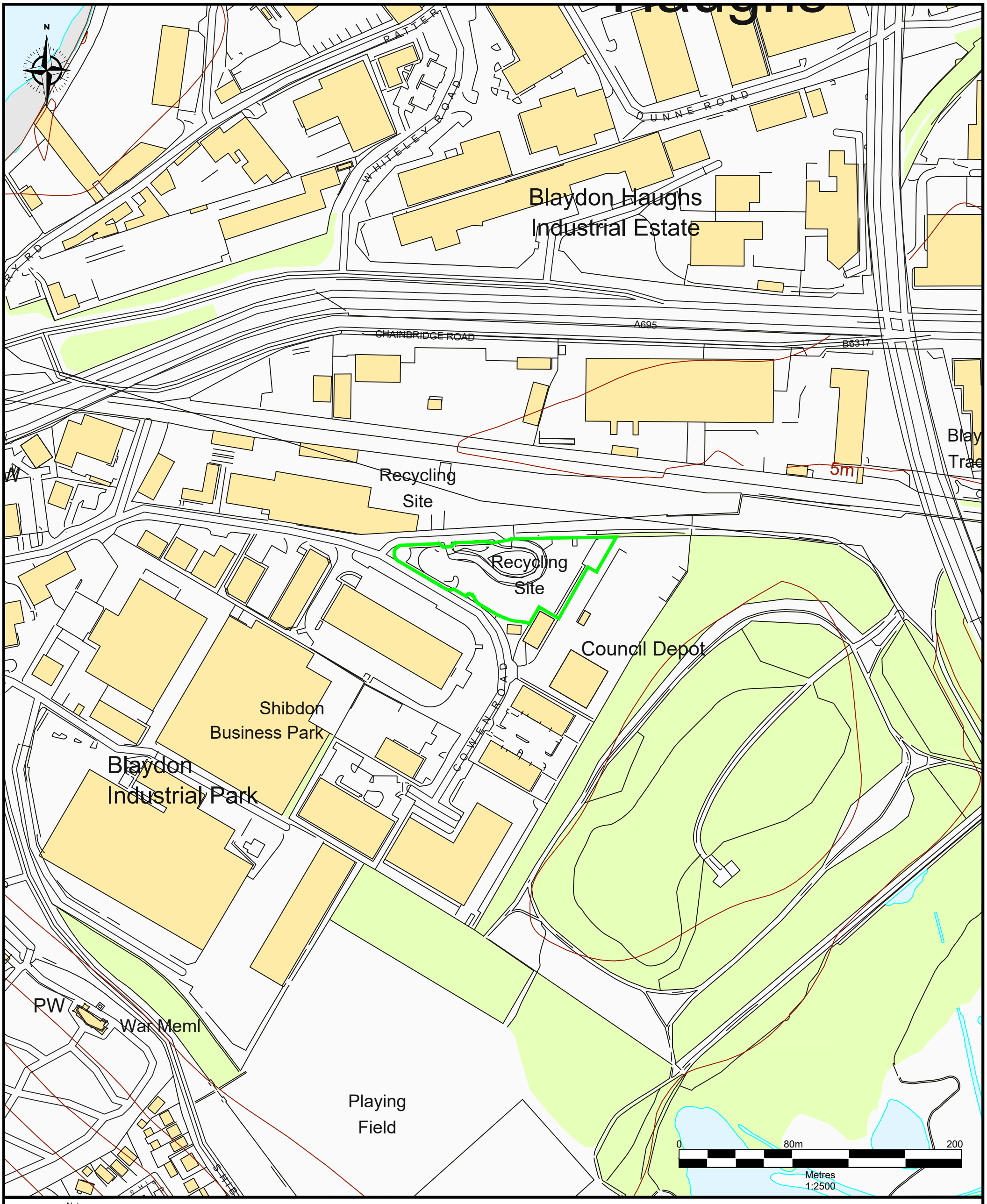
Site: _____

Week Commencing: _____

Monday
Tuesday
Wednesday
Thursday
Friday
Saturday
Sunday
Other Comments

Figures

Figure 1 – Site Location Plan



Notes

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Permit Boundary

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

Site	Cowen Road HWRC
Title	Site Location Plan
Scale	1:2,500 @ A3
Date	August 2025
Drawing Ref	Cwn-PLN-1123-01b
Drawn by	JA
Checked by	SW

Rev	subject	date
A	Updated Layout	March 2025
B	Permit Boundary Adjusted	August 2025

Figure 2 – Indicative Site Layout Plan

N

GAS BOTTLES

Track

ENTRANCE

EXIT

CHEMICALS

REUSE

TEXTILES

PAPER

MIXED RECYCLING

WEEE (SDA)

FL. TUBES

BATTERIES

OIL

TYRES

GIVE WAY

TV/ MONITORS

UNLOADING

FRIDGES

WEEE (LDA)

SOILS

SCRAP METAL

SITE OFFICE

WELFARE CABIN

UNLOADING

1 GANTRY 2 HARDCORE & RUBBLE PLASTERBOARD

3 GANTRY 4 GARDEN WASTE WOOD

5 GANTRY 6 CARDBOARD GENERAL WASTE

7 GANTRY 8 MATTRESSES HARD PLASTICS

9 GANTRY 10 GENERAL WASTE POPs WASTE

11 GANTRY 12 WOOD GARDEN WASTE

13 GANTRY 14

1 2 3 4 5 6

STREET SCENE RESIDUAL

UNLOADING

COWEN ROAD

HGV ONLY

6 14 7 23 17

e

0 5 10 15 20m 30 40 50

Metres
1:500

Notes

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Permit Boundary

Rev	subject	date
A	Permit Boundary Adjusted	August 2025

suez

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

Site: Cowen Road HWRC

Title: Indicative Site Layout

Scale: 1:500 @ A3

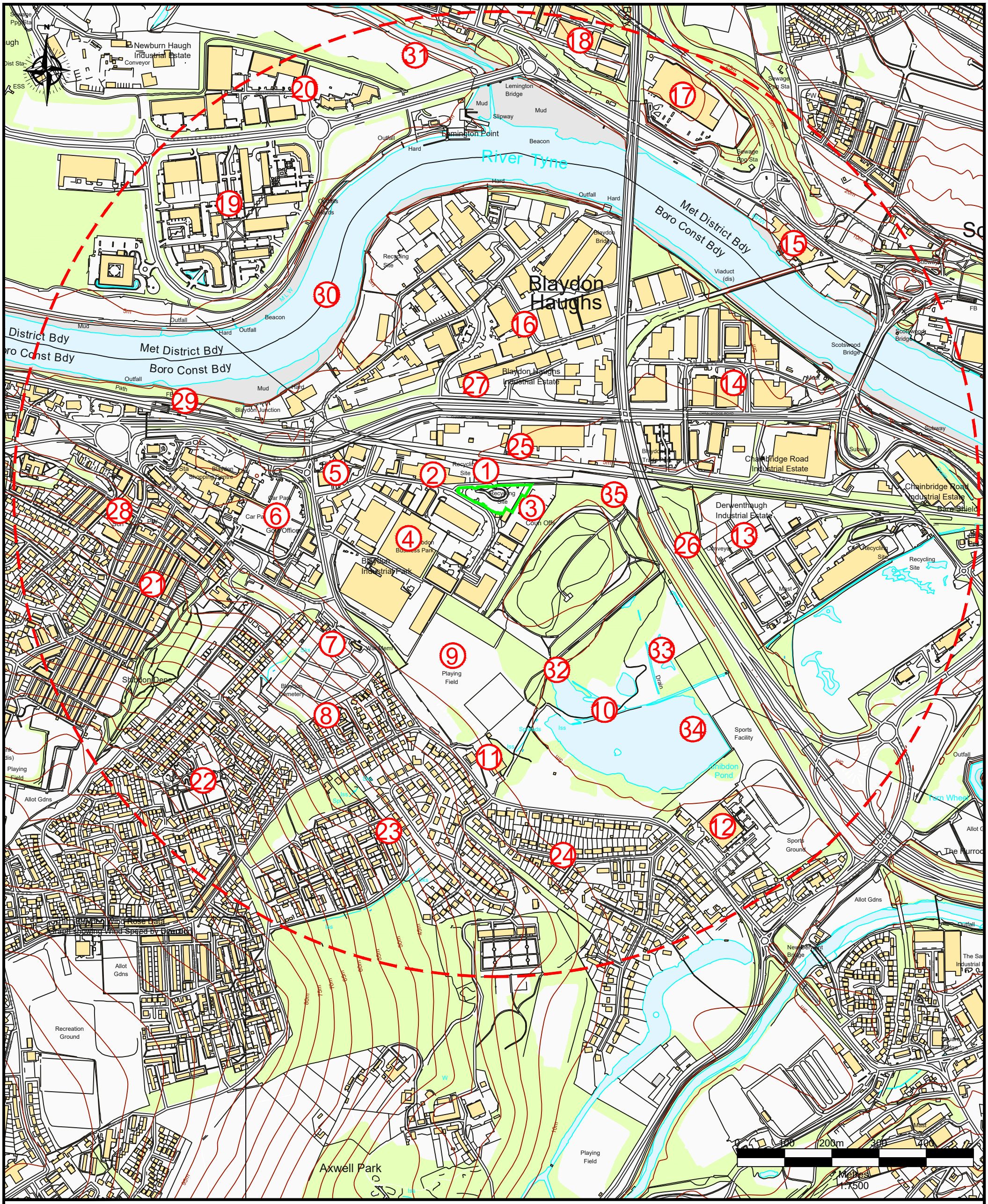
Date: August 2025

Drawing Ref: Cwn-LAY-1124-01a

Drawn by: JA

Checked by: SW

Figure 3 – Receptor Plan



Notes

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Permit Boundary

1km Offset

① Receptors

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

Site	Cowen Road HWRC
Title	Environmental Compound Site Receptor Plan
Scale	1:7,500 @ A3
Date	August 2025
Drawing Ref	Cwn-REC-0225-01a
Drawn by	JA
Checked by	KH

Rev	subject	date
A	Permit Boundary Adjusted	August 2025