Appendix 4

Odour Management Plan

Cumbria Land Management Limited

Odour Management Plan

Hespin Wood Landfill,

Todhills,
Carlisle,
Cumbria,
CA6 4BJ

WESTBURY ENVIRONMENTAL

PROVIDING SOLUTIONS, ENSURING COMPLIANCE

T 01952 879705 E info@westburyenv.co.uk

A Agriculture House, Southwater Way
Telford, Shropshire, TF3 4NR

W www.westburyenv.co.uk

Document Control Table

Project Reference	24/012r
Project Title	Odour Management Plan
Document Title	Odour Management Plan, Version 1
Document Issue Date	10 April 2025
Client	Cumbria Land Management Limited
Status	Issued

Change log

Version	Changes	Produced by	Checked by	Date
1	Original Odour Management Plan.	Sian Wilcox	Tracey Westbury	10 April 2025

Contents

1. Introduction 1
2. Relevant Legislation 2
3. Site Location and Sensitive Receptors 3
4. Operations at the Site 6
5. Risk Matrix for Measures to be Taken 10
6. Odour Management Mitigation 12
7. Reporting and complaints response 17

Tables

Table 3.1 Sensitive Receptors 5
Table 5.1 Estimating the magnitude of risk. 10
Table 5.2 Temperature 10
Table 5.3 Risk matrix for warm weather 10
Table 5.4 Risk matrix for cool weather 11
Table 5.5: Action and odour monitoring frequency required for each level of risk 11
Table 6.1: Inventory of Odorous Materials 13
Table 6.2: Source Pathway Receptor Routes 16

Appendices

Appendix 1 Odour Control Procedure
Appendix 2 Odour Complaints Form

1. Introduction

1.1. Westbury Environmental Limited has prepared this Odour Management Plan (OMP) on behalf of Cumbria Land Management Limited to support an application for a Permit Variation to remove annual input limits for non-hazardous waste and inert waste.

1.2. The Site is located at Hespin Wood Landfill, Todhills, Carlisle, Cumbria, CA6 4BJ (Site).

1.3. The Site is located near to the residential area of Todhills. Land surrounding the Site is otherwise largely agricultural.

1.4. This OMP has been produced in accordance with the Environment Agency Technical Guidance Note H4: Odour Management – how to comply with your environmental permit.

1.5. This OMP provides detailed information on the sources, risks and mitigation measures related to the potential for increased odour emissions due to the removal the removal of limits for proposed changes to annual waste inputs.

1.6. It is considered that there could be an increase in odour emissions from the Site on the removal of the annual waste input limits due to the fact that the rate of waste inputs is likely to increase.

Content of the Odour Management Plan

1.7. This Odour Management Plan is structured as follows:

- Section 2 provides a summary of the relevant legislation and guidelines.
- Section 3 provides information relating to the Site setting, including the location of the Site and nearby sensitive receptors.
- Section 4 provides information on the operations carried out on the Site and the delivery of material to the Site.
- Section 5 provides information on the site management and the mitigation measures employed at the Site.
- Section 6 provides a description of how complaints can be made and how they are addressed by the site management.

2. Relevant Legislation

Environmental Protection Act 1995

2.1. The Environmental Protection Act 1990, Part III, Section 79 is the primary legislation for controlling odour from industrial, trade and business premises.

2.2. Local Authorities must review complaints about odours from industrial, trade and business premises that could be a 'statutory nuisance' covered by the Environmental Protection Act 1990.

2.3. Odour may be considered a 'statutory nuisance' if one of the following applies:

- The odour unreasonably and substantially interferes with the use or enjoyment of a home or other premises.
- The odour injures health or is likely to injure health.

2.4. An 'abatement notice' will be served by the Local Authority if it is agreed that a statutory nuisance is happening, has happened or will happen in the future. An abatement notice will require whoever's responsible to stop or restrict the odour being produced.

2.5. If an abatement notice is not complied with then the person responsible may be prosecuted and/or fined.

2.6. Local Authorities can also take action to stop or restrict the nuisance by:

- Carrying out works and making the person given the abatement notice pay for them (this can include seizure and confiscation of equipment)
- Applying to the High Court for an injunction (if a prosecution is not adequate)

Compliance with Environmental Permit

2.7. The Environment Agency ensures odour from permitted waste facilities is controlled by including conditions relating to odour emissions in the Environmental Permit.

2.8. If the Environment Agency consider that odour emissions are at an unreasonable level, then the operator will be required to take further abatement measures to reduce odour pollution or risk having to reduce or cease operations.

2.9. A final determination as to whether there has been a Permit breach will involve an assessment of the level and effect of the emissions and the appropriateness of the measures being employed.

3. Site Location and Sensitive Receptors

3.1. Hespin Wood Landfill is located at Todhills, Carlisle, Cumbria, CA6 4BJ.

3.2. The land surrounding the Site is largely agricultural, with the nearest residential area being Todhills which is located approximately 630m southeast from the Site boundary at its closest point.

3.3. The Site is not located within a Groundwater Source Protection Zone. The nearest surface water features are the Channel of River Esk located approximately 1.25km northwest and the River Eden approximately 1km southwest of the Site boundary.

3.4. The Site is located within flood Zone 1 and therefore has a low risk of flooding.

Sensitive Receptors

3.5. This OMP identifies receptors within 1km of the Site that may be sensitive to odour emissions as a result of the permit variation to remove annual waste input limits for landfill deposit.

3.6. Receptor sensitivity is a key factor in determining the significance of odour pollution as some receptors are more sensitive than others. Residential receptors tend to have considerably lower tolerance to odour pollution than commercial and industrial receptors.

3.7. Locations with a high sensitivity to odour near to the Site include the residential area of Todhills 250m southeast of the Site at its closest point.

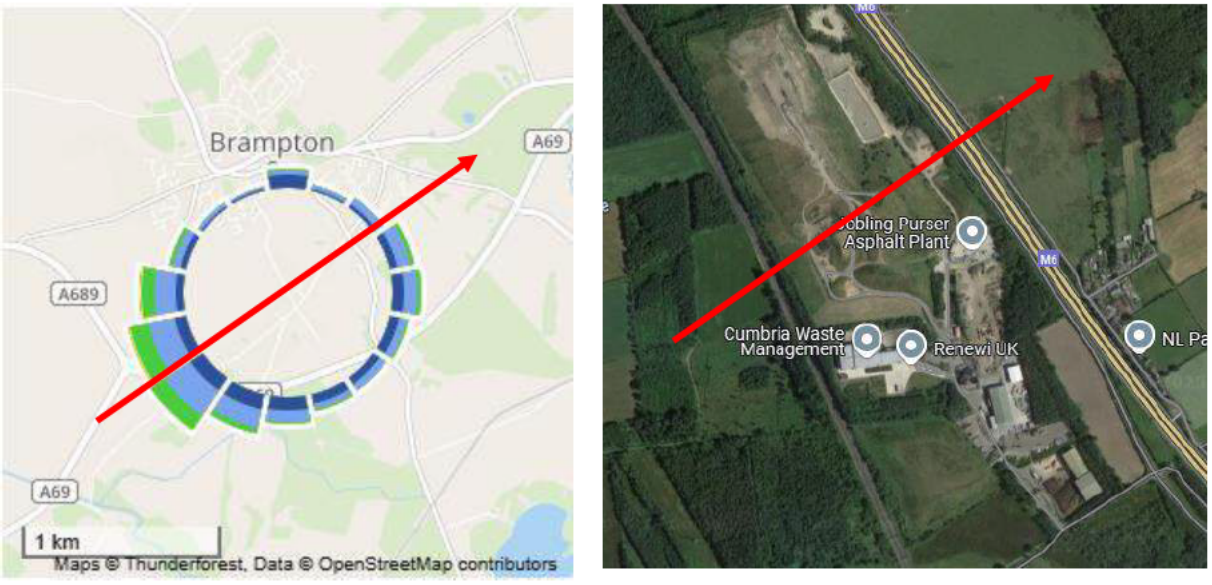
3.8. The distance from the Site boundary to the sensitive receptor plays an important role in the potential impact experienced from odour emissions. Odour intensity reduces significantly the further away from the source.

3.9. The predominant wind direction also plays an important role in the potential impacts experienced from odour emissions.

3.10. Wind direction data has been obtained from Brampton weather station, see Figure 3.1. Brampton weather station is the nearest weather station with wind rose statistics and is located approximately 15km southeast of the Site.

3.11. The predominant wind blows towards receptors to the north-east of the Site which includes industrial and residential areas, see Figure 3.1: Wind rose from Brampton weather station.

Figure 3.1: Wind rose from Brampton weather station



3.12. The direction and distances from the boundary of the Site to the boundary of sensitive receptors are provided in Table 3.1 Sensitive Receptors.

Table 3.1 Sensitive Receptors

Ref	Receptor	Description	Direction from Site Boundary	Approx. Distance from Site Boundary to Receptor Boundary (m))	Receptor sensitivity
1	Todhills	Residential	Southeast	250	Medium
2	Rockcliffe	Residential	Southwest	1km	Low
3	M6	Motorway	East	120	Low

3.13. The closest residential area to the site is Todhills, situated 250m southeast of the site. This area is not in the predominant wind direction. It is expected that the wind direction will reduce the impact of any odour emissions produced by the potential increase in annual waste input at this receptor.

3.14. The M6 motorway is situated between the site and the nearest residential areas. Given the substantial traffic on the M6, it is anticipated that vehicle movements will aid in dispersing potential odour emissions from the potential increase in annual waste input.

Meteorology

3.15. Adverse weather conditions such as heat waves may increase the potential for odour emissions from wastes deposited on Site. Prolonged spells of high temperatures will lead to biodegradable waste degrading quicker, thereby increasing the potential for odour emissions.

Other Sources of Odour

3.16. Operations undertaken by nearby industrial/commercial businesses such as Jobling Purser Asphalt Plant which borders the Site to the southeast, Cumbria Waste Management waste transfer station which borders the Site to the south, and AWJ Recycling Centre, located approximately 280m southeast of the Site.

3.17. It is also considered that agricultural activities carried out at particular times of the year on the surrounding agricultural land have the potential to cause odour emissions that will impact local sensitive receptors.

4. Operations at the Site

Waste Deliveries

4.1. All waste deliveries are accompanied by a Waste Transfer Note (WTN) which is obtained from the load driver. The WTN provides information on the driver, waste haulier name, permit number, description of waste etc. Loads not accompanied by a WTN or that do not match the description on the WTN are rejected.

4.2. A record is kept of all vehicles delivering waste to and from the Site, along with the type, quantity and source of waste delivered. WTN's are appropriately stored for a minimum of two years.

4.3. Waste acceptance procedures are applied to ensure that only suitable waste is accepted.

4.4. It is considered that the removal of the annual waste input limits for non-hazardous and inert waste will potentially result in a larger number of waste deliveries to site per annum. This will mean that there may be a higher volume of deliveries containing odorous wastes.

Waste storage and handling

4.5. The operations carried out at the Site include the receipt, handling, storage and disposal of waste in a landfill.

4.6. The movement and handling of odorous wastes may generate odour emissions. There is a possibility for larger amounts of odorous material to be handled and deposited in the landfill per annum due to the removal of annual waste input limits.

5. Risk Matrix for Measures to be Taken

5.1. The following section details the assessment process to be taken when determining if activities on Site should stop in order to prevent significant odour.

5.2. Weather conditions are monitored each working day as part of the Odour Control Procedure see Appendix 1 Odour Control Procedure.

Estimating Magnitude of Risk

5.3. Table 5.1 provides a matrix for estimating the magnitude of risk from a potential hazard, considering both the probability and consequences of the hazard occurring.

5.4. The magnitude of risk determines the level of management required to reduce the probability of the hazard occurring.

5.5. In this management plan, the hazard is considered to be the significant emission of odour from the Site such that it could cause nuisance to local sensitive receptors. Table 5.1 describes this Risk Matrix applied to this assessment of risk.

Table 5.1 Estimating the magnitude of risk.

	Magnitude of Risk	Consequence			
		High	Medium	Low	Negligible
Probability	High	Very high	High	Medium/Low	Very low
	Medium	High	Medium	Low	Very low
	Low	High/Medium	Medium/Low	Low	Very low
	Negligible	High/Medium/Low	Medium/Low	Low	Negligible

5.6. An assessment of the most common weather conditions and their potential to generate significant detectable odour emissions from the activities on Site has been undertaken and is presented in Table 5.2 to Table 5.4.

5.7. The risk assessment is separated into two sections. In Table 5.2 the operator must record the temperature and then proceed to the corresponding table. Tables 5.2 and 5.4 contain all common weather conditions and their risk magnitude. Actions required for each risk category are detailed in Table 5.5.

Table 5.2 Temperature

Temperature	Action
Warm (Above 18°C)	Go to table 5.3
Cool (Below 18°C)	Go to table 5.4

Table 5.3 Risk matrix for warm weather

Conditions	Probability of odour nuisance occurring	Consequence	Risk magnitude
low wind (<3 Beaufort)	Low	Medium	Medium/Low
medium wind (>4 Beaufort)	Medium	Medium	Medium
high wind (>8 Beaufort)	Low	Medium	Medium/Low

Table 5.4 Risk matrix for cool weather

Conditions	Probability	Consequence	Risk magnitude
low wind (<3 Beaufort)	Negligible	Medium	Medium / Low
medium wind (>4 Beaufort)	Low	Medium	Medium / Low
high wind (>8 Beaufort)	Negligible	Medium	Medium / Low

5.8. The above Risk Matrix details are based on the following assumptions:

- More anaerobic degradation / odour generation will occur in warmer weather.
- High wind speeds will cause a greater dilution of the odour from the site thereby reducing the risk of nuisance to the sensitive receptors.

5.9. The action and odour monitoring frequency required for each level of risk is provided in Table 5.5: Action and odour monitoring frequency required for each level of risk.

Table 5.5: Action and odour monitoring frequency required for each level of risk

Risk Magnitude	Action	Odour Monitoring Frequency
Low	Continued implementation of preventive measures.	Once per day at around midday.
Low / Medium	Continued implementation of preventative measures.	Once per day at around midday.
Medium	Continued implementation of preventative measures. Odour emissions are likely, therefore movement / deposit of waste may temporarily cease if preventative measures are not proving effective in preventing the odour emission.	Twice per day, once in the morning, once in the afternoon.
High	Continued implementation of preventative measures. Odour emissions are likely therefore movement / deposit of waste with a potential to cause odour may not be undertaken or will be temporarily ceased.	At least every 3 hours.

6. Odour Management Mitigation

Responsibility for Implementation of the Odour Management Plan

6.1. The Site Manager is responsible for the implementation of the OMP and for ensuring that the mitigation strategies in place are adhered to. Where the Site Manager is unavailable to oversee the implementation of odour management, a suitably experienced Site Operative is allocated responsibility.

6.2. The effectiveness of the OMP is reviewed every year or when a change in operations is deemed to have the potential to increase odour emissions at the Site. The review process will amend any mitigation measures that have been identified as areas for improvement.

6.3. All staff members have the necessary training to deliver odour mitigation measures detailed within this OMP. All staff are given training on the EMS for the Site, which include an Odour Control Procedure, see Appendix 1 Odour Control Procedure. Where new odour control measures are to be implemented refresher training will be provided to ensure staff remain competent. This training is delivered by the Site Manager.

Overview of Odour Control

6.4. Cumbria Land Management Limited have odour control measures in place to help mitigate odour emissions at the Site, see Table 6.2.

6.5. Incoming mixed waste loads will be unloaded and deposited as soon as practically possible to ensure that the odour potential of odorous materials is reduced.

6.6. General housekeeping and regular cleaning of waste storage areas and operational areas is carried out on Site to further reduce the potential for significant odour emissions.

6.7. In the event of a complaint of odour being received, the Accidents, Incidents and Complaints Procedure within the EMS should be followed.

6.8. All Site operatives will be given the appropriate training in managing odour emissions and malodours material. Training will also be given to all personnel who are responsible for completing Odour Complaint Forms, see Appendix 2 Odour Complaint Form.

Odour Monitoring

6.9. Odour monitoring will be completed in accordance with the Odour Control Procedure, see Appendix 1 Odour Control Procedure.

6.10. Frequency of monitoring will be determined by weather conditions.

6.11. All staff responsible for checking odour will have received specific training from Site management on odour inspection.

Sources and Control of Odour Emissions

6.12. Table 6.1 provides an inventory of the potentially odorous materials that may be handled, stored and deposited on Site.

6.13. Table 6.12 details the potential sources of odour on the Site and which mitigation measures are implemented in order to break the source-pathway-receptor routes for odour emissions.

Table 6.1: Inventory of Odorous Materials

Waste Type	List of Waste Codes	Description	Factors that influence odour emissions	Potential for variation
Wastes from Agriculture, horticulture, aquaculture, forestry, hunting and fishing, food preparation and processing	• 02 01 01 – sludges from washing and cleaning • 02 01 02 – animal-tissue waste • 02 01 03 plant-tissue waste • 02 01 06 – animal faeces urine and manure (including spoiled straw), effluent, collected separately and treated off-site • 02 02 03 – materials unsuitable for consumption or processing • 02 03 04 – materials unsuitable for consumption or processing • 02 05 01 – materials unsuitable for consumption or processing • 02 06 02 – wastes from preserving agents • 02 07 01 – wastes from washing, cleaning and mechanical reduction of raw materials • 02 07 02 – wastes from spirits distillation • 02 07 03 – wastes from chemical treatment	Potential to be odorous as a result of decomposing organic material.	Quality of material – moisture content, organic content, age, degradation, ambient temperature). Quantity of waste on site and input of material.	Potentially less odorous in winter months due to lower ambient temperature. Potentially more nitrogenous and degraded from April to September.

	• 02 07 04 – materials unsuitable for consumption or processing			
Municipal Wastes	• 20 01 08 – biodegradable kitchen and canteen waste • 20 01 25 – edible oil and fat • 20 02 01 – biodegradable waste • 20 02 03 – other non-biodegradable wastes • 20 03 01 – mixed municipal waste • 20 03 02 – waste from markets • 20 03 03 – street-cleaning residues • 20 03 04 – septic tank sludge • 20 03 06 – waste from sewage cleaning	Potential to be odorous as a result of decomposing organic material.	Quality of material – moisture content, organic content, age, degradation, ambient temperature). Quantity of waste on site and input of material.	Potentially less odorous in winter months due to lower ambient temperature. Potentially more nitrogenous and degraded from April to September.
Wastes from waste management facilities, off-site waste water treatment plants and the preparation of water intended for human consumption and water for industrial use	• 19 05 01 – non-composted fraction of municipal and similar wastes • 19 05 02 – non-composted fraction of animal and vegetable waste • 19 05 03 – off-specification compost • 19 06 04 – digestate from anaerobic treatment of municipal waste	Potential to be odorous as a result of decomposing organic material.	Quality of material – moisture content, organic content, age, degradation, ambient temperature). Quantity of waste on site and input of material.	Potentially less odorous in winter months due to lower ambient temperature. Potentially more nitrogenous and degraded from April to September.

	• 19 06 06 – digestate from anaerobic treatment of animal and vegetable waste • 19 08 05 – sludges from treatment of urban waste water			
Paper and cardboard	• 15 01 01 – paper and cardboard packaging • 20 01 01 – paper and cardboard	Potential to be odorous as a result of decomposing organic material.	Quality of material – moisture content, organic content, age, degradation, ambient temperature). Quantity of waste on site and input of material.	Potentially less odorous in winter months due to lower ambient temperature. Potentially more nitrogenous and degraded from April to September.
Wood wastes	• 03 01 01 – waste bark and cork • 03 01 05 – sawdust, shavings, cuttings, wood, particle board and veneer • 03 03 01 – waste bark and wood • 15 01 03 – wooden packaging • 17 02 01 – wood • 19 12 07 – wood other than that mentioned in 19 1 06 • 20 01 38 – wood other than that mentioned in 20 01 37	Potential to be odorous as a result of decomposing organic material.	Quality of material – moisture content, organic content, age, degradation, ambient temperature). Quantity of waste on site and input of material.	Potentially less odorous in winter months due to lower ambient temperature. Potentially more nitrogenous and degraded from April to September.

Wastes from the leather, fur and textile industries	• 04 01 01 – fleshings and lime split wastes • 04 01 02 – liming waste • 04 02 10 – organic matter from natural products (for example grease, wax)	Potential to be odorous as a result of decomposing organic material.	Quality of material – moisture content, organic content, age, degradation, ambient temperature). Quantity of waste on site and input of material.	Potentially less odorous in winter months due to lower ambient temperature. Potentially more nitrogenous and degraded from April to September.

Table 6.2: Source Pathway Receptor Routes

Source	Pathway	Receptor	Impact	Odour Control Measures
Reception, handling, storage and deposit of waste.	Atmospheric dispersion causing air transport then inhalation.	Surrounding sensitive receptors.	Nuisance. Potential for complaints if excessive odour is detected beyond the Site boundary.	Odorous materials will be kept to a minimum on site where possible. Incoming waste loads will be deposited as soon as practically possible to ensure that the odour potential of odorous materials is reduced. All Site operatives will be given the appropriate training in managing odour emissions and malodourous material. Training will also be given to all personnel who are responsible for completing Odour Complaint Report Forms. The landfill restoration phases will be completed and capped in a shorter timeframe, reducing the amount of time potentially odourous waste are exposed.

7. Reporting and complaints response

7.1. An Odour Complaint Form will be available on Site. An Odour Complaints Report Form must be filled in and kept on file whenever an odour complaint is received in accordance with the EMS Complaints Procedure.

Engagement with the Community

7.2. A Site Notice Board is located at the Site entrance and includes the following information:

- The Permit holder's name.
- The operator's name.
- An emergency contact name and telephone number.
- A statement that the Site is permitted by the Environment Agency
- The Environmental Permit Ref. EPR/BM6026IB
- The Environment Agency national numbers, 03708 506506 and 0800 807060 (incident hotline).

7.3. The provision of the above information ensures that members of the public can contact the Operator should they be concerned by odour or wish to make a complaint. This also applies to any events that may happen when the Site is unmanned / not operational.

Reporting of Complaints

7.4. Should a complaint regarding odour be received by the Site, the complaint is recorded on the Odour Complaints Report Form in the EMS and investigated in accordance with the Complaints Procedure within the EMS implemented on the Site. The Odour Complaints Report Form records who made the complaint, what the complaint was about and what has been done to resolve the issue and make sure this does not happen again.

7.5. The Site Manager must identify what caused the odour emission to be generated. This generation may have been caused by failure of odour control measures or abnormal weather conditions. If the excessive odour emission has been caused by a procedure not being carried out properly, then staff will receive repeat EMS training on the odour control procedures and site management.

7.6. In all cases, and where information is available, all complaints will be acknowledged and investigated, with resultant actions reported to the complaint. Any complaints received by the Environment Agency or Local Authority relating to odour emissions from the Site are dealt with on the same day.

Management Responsibilities

7.7. Site staff are responsible for odour management issues and detecting/reporting odour emissions. All members of staff are given training on the EMS for the Site, which includes an Odour Control Procedure. All staff on the Site are trained on the Odour Control Procedure which includes details regarding mitigation measures and recording complaints.

7.8. On receipt of a complaint the Site Manager investigates and establishes the cause. The most effective corrective or preventative action must then be determined to prevent future emissions occurring. Where additional time is required in order to implement the appropriate corrective or preventative action the complainant will be contacted with details on the actions to be implemented and the estimated timescales for completion. The maximum response time for contacting a complainant will be two working days.

7.9. Should numerous complaints be received at the Site regarding the same issue, the cause of the complaint(s) will be investigated in accordance with the Accidents, Incidents & Complaints Procedure within the EMS. Operations on the Site will cease or be reduced should excessive odour emissions be identified following the implementation of other mitigation measures or when instruction from the Environment Agency to cease operations has been received.

Appendix 1

Odour Control Procedure

Procedure No. [x] Odour Control — V.1, April 2025

Purpose: To ensure that odours from the Site do not cause a nuisance to sensitive receptors.

		RESPONSIBLE PERSON	RECORD
1.	This Procedure implements the odour control measures included within the Odour Management Plan.	Site Operative	Odour Management Plan
2.	Wastes accepted on to the Site have the potential to cause odour. Waste is deposited into the landfill and covered at the end of each operating day to reduce odour emissions.	Site Operative	
3.	Incoming waste loads will be unloaded and then deposited in the landfill promptly to minimise potential odour emissions from handling odorous waste.	Site Operative	Odour Management Plan
4.	Any vehicles arriving at the Site that may contain potentially malodorous waste will be enclosed or sheeted.	Site Operative	
5.	General housekeeping and regular cleaning of waste storage areas and operational areas is carried out on Site to further reduce the potential for significant odour emissions.		

Monitoring

6.	Olfactory monitoring (sniff testing) will be undertaken on the Site in accordance with Odour Management Plan, including: • Once per day, around midday, when the risk magnitude is Low or Medium/Low. • Twice per day when the risk, once in the morning and once in the afternoon, when the risk magnitude is Medium. • At least every 3 hours when the risk magnitude is High.		Odour Management Plan
7.	Staff responsible for completing odour surveys should: • Not smoke or eat/drink strongly flavoured items for thirty minutes before the odour survey. • Not eat/drink sweet items immediately before or after the odour survey. • Not complete odour surveys if they have an illness which can impact the odour survey e.g., cold, sore throat.		
8.	Once the above is completed, the Site Manager will determine the action to take using the Risk Matrix in the Odour Management Plan.	Site Manager	Odour Management Plan

Complaints

9.	In the event of a complaint of odour being received, the Accidents, Incidents and Complaints Procedure should be followed.	Site Operative	
10.	Should a complaint regarding odour be received by the Site, the complaint will be recorded on the Odour Complaints Report Form in the Odour Management Plan and investigated in accordance with the Complaints Procedure within the EMS implemented on the Site.	Site Operative	Odour Management Plan

	RESPONSIBLE PERSON	RECORD
11. The Odour Complaints Report Form records who made the complaint, what the complaint was about and what has been done to resolve the issue and make sure this does not happen again.	Site Operative	Odour Management Plan
12. The Site Manager must identify what caused the odour emission to be generated. If the excessive odour emission has been caused by a procedure not being carried out properly, then staff will receive repeat EMS training on the odour control procedures and site management.	Site Manager	Training Record
13. In all cases, and where information is available, all complaints will be acknowledged and investigated, with resultant actions reported to the complaint. Any complaints received by the Environment Agency or Local Authority relating to odour emissions from the Site are dealt with on the same day.	Site Operative	Odour Management Plan

Appendix 2

Odour Complaints Form

Form No. [x] **Odour Complaint Report Form**

Site Manager			
Site Address	Hespin Wood Landfill, Todhills, Carlisle Cumbria, CA6 4BJ		
Contact No.			
Name of Complainant		**Contact number of Complainant:**	
Address of Complaintant			
Date of complaint:		**Time of complaint:**	
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 (e.g. from NE)			
Complainants' description of odour: • **What does it smell like?** • **Intensity (see below)** • **Duration (time)** • **Constant or intermittent in this period** • **Does the complainant have any other comments about the odour?**			
Do you accept that the odour was likely to be from the site's activities?			
What activities were being carried out on site when the odour occurred?			
Actions taken:			
Form completed by:	**Date:**	**Signed:**	