

NEWCASTLE-UNDER-LYME BOROUGH COUNCIL

CORPORATE LEADERSHIP TEAM'S

REPORT TO CABINET

16 July 2024

Report Title: Walleys Quarry – Odour Issues

Submitted by: Chief Executive

Portfolios: Sustainable Environment; One Council, People & Partnerships

Ward(s) affected: All

<u>Purpose of the Report</u>		<u>Key Decision</u> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
To update Cabinet on the latest position regarding the problematic odours in the Borough associated with Walleys Quarry.		
<u>Recommendation</u>		
Cabinet is recommended to:		
1. Note the contents of this update report.		
<u>Reasons</u>		
To ensure Cabinet is kept updated on the ongoing work regarding the problem odours associated with Walleys Quarry landfill.		

1. Background

- 1.1** For a number of years, parts of the borough have suffered from foul odours from the Walleys Quarry Landfill Site in Silverdale operated by Walleys Quarry Ltd, part of the RED Industries group of companies. The Environment Agency (EA) is the lead regulator for such sites, testing and enforcing compliance with the permit under which the site operates. The Council also has a role in influencing the operation and performance of such sites, where an operator fails to comply with actions required under an abatement notice issued by the Council in relation to any statutory nuisance caused by the site.
- 1.2** In March 2021, Council held an extraordinary meeting to receive the report of the Economy, Environment and Place Scrutiny Committee review into the Walleys Quarry issues, and to debate a motion demanding the immediate suspension of operations and acceptance of waste at the Walleys Quarry Landfill site.
- 1.3** Following extensive work, officers determined that the odours from the Walleys Quarry site amounted to a Statutory Nuisance and, on 13 August 2021, served an Abatement Notice on Walleys Quarry Ltd. (WQL). Following an appeal by Walleys Quarry Ltd, and a successful mediation process, His Honour District Judge Grego approved the settlement that the parties had reached and issued a court order upholding the Abatement Notice and dismissing WQL's appeal on 6 October 2022.

- 1.4 The Council continues to assess the prevalence of odours off site. If there are further instances of statutory nuisance identified which amount to a breach of the Abatement Notice, the Council's Enforcement Policy will guide the process to be followed [Reference: [Environmental Health enforcement policy – Newcastle-under-Lyme Borough Council \(newcastle-staffs.gov.uk\)](https://www.newcastle-staffs.gov.uk)]. This would determine what action the Council would take, and whether that would be formal or informal. Enforcement is usually considered sequentially but should the circumstances or nature of the breach be such, escalation direct to prosecution is possible. The Council would need to obtain the consent of the Secretary of State before it is able to prosecute an offence of breaching an abatement notice, as the site is permitted by the Environment Agency.
- 1.5 Officers maintain an ongoing dialogue with Walleys Quarry Ltd, and with other agencies involved with the issue. Cabinet has received monthly updates on the issues relating to the odours, and Council has also been regularly updated.

2. Complaint Data

- 2.1 Below is a schedule of complaints received by the Council and by the Environment Agency from April 2024, reported on a weekly basis. Historical complaint data is attached to this report as Appendix 1.

	Complaints to NuLBC	Complaints to Environment Agency
April 2024		
01/04/24- 07/04/24	56	220
08/04/24-14/04/24	18	75
15/04/24- 21/04/24	32	145
22/04/24- 28/04/24	55	196
29/04/24- 05/05/24	41	167
May 2024		
06/05/24- 12/05/24	75	311
13/05/24- 19/05/24	76	192
20/05/24- 26/05/24	89	240
27/05/24- 02/06/24	75	207
June 2024		
03/06/24- 09/06/24	38	114
10/06/24- 16/06/24	50	147
17/06/24- 23/06/24	67	189
24/06/24- 30/06/24	117	298
July 2024		
01/07/24- 07/07/24	45	103
08/07/24-14/07/24	46	

- 2.2 Officers highlight any odour events where 10 or more odour complaints have been recorded.

There have been 11 odour events in the month of June 2024:

- Sunday 02 June 2024

- Wednesday 12 June 2024
- Friday 14 June 2024
- Wednesday 19 June 2024
- Thursday 20 June 2024
- Friday 21 June 2024
- Monday 24 June 2024
- Tuesday 25 June 2024
- Wednesday 26 June 2024
- Thursday 27 June 2024
- Sunday 30 June 2024

The highest number of complaints reported to NuLBC on 26 June 2024 (31 complaints).

- 2.3** The overall trend is for “spikes” in complaints when odours are prevalent.

NULBC Odour Assessments

- 2.4** Officers have undertaken odour assessments. The monitoring has been reactive to odour complaints and proactive where low odour dispersion is predicted.

The type of monitoring includes spot assessments (instantaneous assessments) and assessments made over a 5-minute period where the odour intensity is recorded every 10 seconds.

2 assessments were undertaken over 5 mins, both recording a maximum intensity rating of 4.

14 spot assessments were undertaken in June of which landfill odour was detected in 10 assessments. 9 assessments had an intensity rating of 4 and 1 assessment had an intensity rating of 2.

NULBC Mobile Air Quality Monitoring (using Jerome monitor)

- 2.5** Officers have monitored the levels of hydrogen sulphide within the community using the mobile Jerome monitor. The highest level of hydrogen sulphide recorded in the community was 9.2ppb at Cemetery Road at 11:14 on 19 June 2024.

NULBC Actions

- 2.6** It is disappointing to report that over the winter period there had been a deterioration in the odour conditions from Walleys Quarry as shown in the data reported. However, it can be seen that the data for April to date is variable showing some periods of improvement and some deterioration.
- 2.7** Critically, under the law, whilst odours may exist off site at levels which could be considered a breach of the notice, that breach would be unenforceable (or a defence against creating a statutory nuisance) if the operator can show that Best Practical Means (BPM) are routinely deployed in the management of the site. Whilst the existence or not of BPM can be debated, it would be a court which would determine whether BPM was in place at the time of the breach. That said, prior to entering into any formal legal action it is necessary for the Council to formulate a view with regard to this matter, this is ongoing.

- 2.8** At the core of next steps are two issues – whether the action taken by the Environment Agency as the primary enforcement agency for this site have been successful in remedying the issues; and whether a defence of BPM exists. Where either of these are assessed to be in place it would not be in the public interest for the Council to pursue this matter further.
- 2.9** The Council has written to the Secretary of State requesting permission in relation to legal proceedings. A response was received on 5 June 2024 from the Deputy Director for Resources and Waste stating: ‘we have been considering your letter and have sought input on the facts of the issue from the Environment Agency’.
- 2.10** Steve Reed OBE MP was appointed Secretary of State for the Department of Environment, Food and Rural Affairs (DEFRA) on 5 July 2024. Cllr Simon Tagg also wrote on 9th July to the newly appointed Secretary of State, urging quick approval of our outstanding request, which was made in April, to bring legal action against the operators of Walleys Quarry.
- 2.11** The newly appointed Secretary of State for Environment, Food and Rural Affairs is now considering all the relevant information/advice to enable him to take a decision and respond to our request. The Council now awaits his decision.
- 2.12** In May there was an upturn in odour complaints followed by a reduction in June. It should however be noted that in June the number of complaints were above those reported in 2022 and 2023 for the same month.

Scrutiny- Committee of Inquiry

- 2.13** With regard to Scrutiny, a report outlining a proposed approach to convening a ‘Committee of Inquiry’ was presented at Health, Wellbeing & Environment Scrutiny Committee on 26th February 2024, this can be found at [WQ Scrutiny post Council.pdf \(newcastle-staffs.gov.uk\)](#) the recommendations were endorsed. The Committee of Inquiry members have been selected and the scoping meeting has been held.
- 2.14** At a 16th May member meeting, briefings/information to help members understand some of the technical issues involved in WQ and effects from the operations, in preparation for the Inquiry session(s) were presented. Members also considered responses received to date from participants in the 2020/21 exercise who had been invited to review/update their previous statements.
- 2.15** Plans are currently being put in place to obtain statements for the Committee of Inquiry Day now planned for 23rd July (plus another session on the 14th August), when participants will be invited to appear before members. A report and recommendations will duly be prepared and presented to Cabinet and Council for consideration.

Air Quality & Health

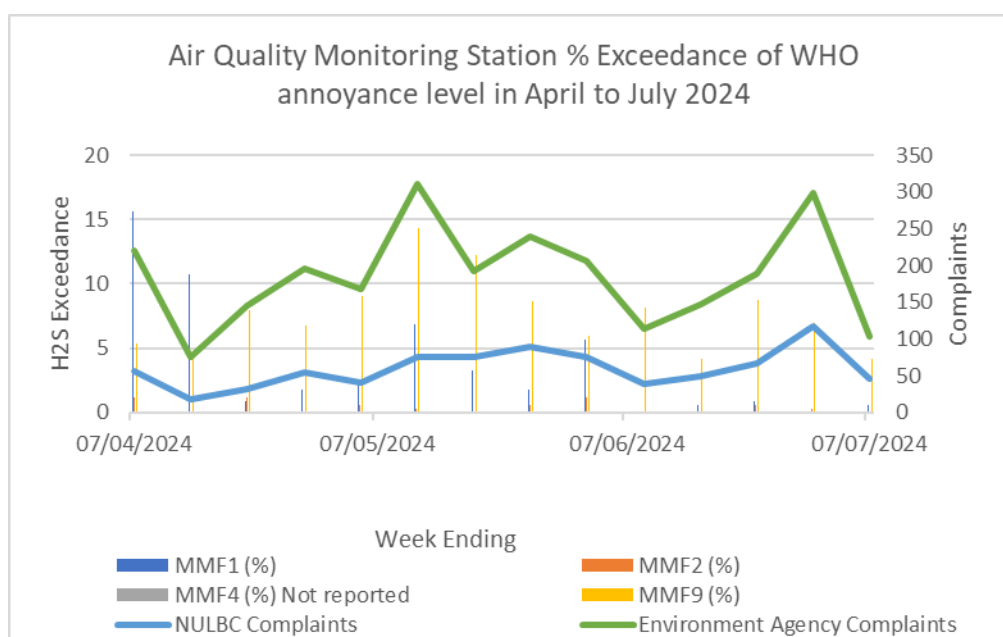
- 2.16** The Council, Staffordshire County Council, and the Environment Agency have jointly funded a campaign of air quality monitoring utilising three static air monitoring stations. The Environment Agency manage and operate these air quality monitoring stations. Data from these stations has been routinely published weekly by the Environment Agency (EA).
- 2.17** Hydrogen sulphide levels have previously been reported and reviewed as part of this report and a full data set provided in Appendices. On 5 October, the Environment Agency provided an update, alerting the community to a problem with the reliability of the Hydrogen Sulphide (H₂S) monitoring data collected at the monitoring stations. This

update is available at the following link [Latest News | Engage Environment Agency \(engagementhq.com\)](https://www.engagementhq.com)

- 2.18** On 19 October 2023, the EA calibrated the H2S analysers in MMF1 and MMF2. The EA have sufficient confidence in the raw data recorded for the week commencing 16 October 2023 to allow the EA to restart publishing data from MMF1 and MMF2.
- 2.19** The latest H2S data is set out in the table below, defining the proportion of the time periods where H2S levels were above the WHO Odour Annoyance guideline of 7ug/m³. Historic data is available in Appendix 4.

Time Period	MMF1 (%)	MMF 2 (%)	MMF 9 (%)
01 April - 07 April 2024	15.6	1.2	5.4
08 April – 14 April 2024	10.7	0	4.8
15 April – 21 April 2024	0.9	1.2	7.9
22 April –28 April 2024	1.8	0	6.7
29 April – 05 May 2024	2.4	0.6	9.0
06 May – 12 May 2024	6.85	0.3	14.3
13 May – 19 May 2024	3.3	0	12.2
20 May – 26 May 2024	1.8	0.6	8.6
27 May – 02 June 2024	5.7	1.2	6.0
03 June – 09 June 2024	0.0	0.0	8.1
10 June – 16 June 2024	0.6	0.0	4.2
17 June – 23 June 2024	0.9	0.6	8.7
24 June – 30 June 2024	0.0	0.3	6.9
01 July – 7 July 2024	0.6	0.0	4.2

- 2.20** The complaint data and weekly % exceedance of the WHO annoyance level have been combined and is shown on the graph below:



H2S Data Adjustment Method

2.21 The EA provided an update on 10 April 2024 as follows:

‘In November 2023 we explained that we had developed a data adjustment method that could allow us to adjust historic hydrogen sulphide (H₂S) data, and that an independent peer review group, led by Defra’s Chief Scientific Adviser was assessing this method.

In February 2024 we informed you that we expected the group’s findings to be published shortly. We understand that the report has been undergoing quality assurance. Unfortunately, no firm date has been given for its publication.

We recognise that members of the community may be feeling frustrated by the delay. Once the report is formally approved and published, we expect to outline next steps, including the possibility of adjusting historic data, and anticipate offering another virtual public meeting.’

2.22 On 8 July 2024 the EA issued the following update regarding the data adjustment method:

‘Several members of the community have been asking for an update on the publication of the report of the peer review, led by Defra’s Chief Scientific Adviser. The Environment Agency has not taken part in and has no control over the outcome of the review, or the timescales involved. However, we recognise that members of the community may be feeling frustrated by the delay.

In our update on the Environment Agency’s Engagement HQ website on 10 April 2024, we explained that the report had been undergoing routine quality assurance. Prior to publication, the report must be reviewed and cleared by the Chief Scientific Adviser, the rest of the Peer Review Group and ministers. We understand new ministers will want to review the report before publication and will look to do so at an early stage of the new government to prevent further delays.

As soon as the report is published, we expect to outline next steps and anticipate offering another virtual public meeting’.

Environment Agency Regulatory and Enforcement Action

2.23 The Environment Agency has continued to provide updates on their regulatory activity on the Walleys Quarry Landfill and can be accessed here: <https://engageenvironmentagency.uk.engagementhq.com/hub-page/walleys-quarry-landfill>

2.24 These updates reflect regular EA officer presence at the site to review progress with the Contain Capture Destroy strategy. The Compliance Assessment Reports (published on the [EA website](#)) provide further details of the site visits undertaken.

2.25 The following table provides a summary of the published CAR (Compliance Assessment Report) forms since the last Cabinet report:

Date of Report	Date issued	CAR reference	Assessment	Compliance Score
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27/02/24	27/02/24	DP3734DC/0495267	Review of Odour Management Plan Rev: 4.0	31
29/04/24	02/05/24	DP3734DC/0502412	Site inspection - announced	0
07/05/24	07/05/24	DP3734DC/0502992	Report/data review Temporary Capping Assessment	0
08/05/24	21/05/24	DP3734DC/0503511	Site inspection – unannounced	0
13/05/24	13/05/24	DP3734DC/0503746	Retro drilling and installation of leachate wells – CQA report	0
22/05/24	05/06/24	DP3734DC/0506055	Site inspection – unannounced	0

Non-compliance identified

2.26 The non-compliance identified in the CAR dated 27 February 2024 states:

‘In CAR Report ID: DP3734DC/0477431 issued on 27 October 2023, we notified Walleys Quarry Ltd (WQL) that we were not satisfied that the approved Odour Management Plan (“OMP”) (dated October 2019 version 2.2) (“v 2.2”), which forms part of WQL’s written Management System, identified and minimised the risks of pollution due to odour from the disposal of waste in the landfill’

‘WQL was required to (i) review the OMP so that it was capable of approval and (ii) submit a revised version to the Environment Agency by 08 December 2023’.

‘WQL submitted a revised version of the OMP document reference ECL.9353.R01.001 Rev:4.0 (“Rev 4.0”) on 08 December 2023

‘You have been scored a category 2 non-compliance (31 CCS points), because your OMP (including the revisions captured in Rev 4.0), which forms part of your management system, does not identify and minimise the risks of pollution due to odour.

The OMP continues to omit a sufficient level of detail, including clear statements about how and when WQL will implement appropriate measures to control odour.

This is a non-compliance which could have a significant effect on quality of life, due to an increased risk of odour pollution occurring beyond the site boundary, causing offence to local residents’ sense of smell. Where the EMS, which you should operate in accordance with, does not identify and minimise the risk of pollution by identifying appropriate measures that you will take to manage odour caused by depositing waste in the landfill, a substantial number of people are likely to be affected by odour pollution given their proximity to the site.

Action 1: Revise your OMP so that it identifies and minimises the risks of pollution due to odour.

The revised OMP shall include:

1. Clear commitments by WQL to specific actions, which avoid vague language. Caveats such as ‘where necessary’, ‘as soon as practicable’, ‘where possible’ and ‘where circumstance dictate’ make it impossible to understand when, or even if, you will implement the measure(s). These and any similar phrases should be deleted;

2. Detailed cross-references to all supporting documents and procedures mentioned in the OMP, in particular waste acceptance procedures, including version number and dates of issue. The cross references in the OMP should direct the reader straight to the piece of information in question, and the documents should be appended to the OMP;

3. Reference to current guidance available on .gov.uk; For the avoidance of doubt, IPPC H4: Horizontal Guidance for Odour is now obsolete and was replaced with H4 Odour Management available online here:

<https://www.gov.uk/government/publications/environmental-permitting-h4-odour-management>

Environment Agency guidance for the Landfill Sector S5.02 was withdrawn and has been replaced with Landfill operators: environmental permits available online here:

<https://www.gov.uk/guidance/landfill-operators-environmental-permits>

4. Fully address adaptation to odour by all site personnel to avoid underestimates of odour, including how adaptation is minimised;

5. An inventory of odour sources that includes:

1. Identifying the main waste materials received; cross referencing them with the waste codes that appear in Table S2.1 of the permit; quantifying the maximum amount of each waste type accepted per day, and defining the maximum storage duration prior to disposal;

2. Quantifying the amount of landfill gas production over time together with the maximum levels of odorous compounds like hydrogen sulphide that might be expected in the gas, and quantifying the amount of leachate held and treated on site (including tankering off site) and discharged to sewer;

6. Housekeeping controls, including what is done, who is responsible, the frequency of each activity and the expected result;

7. Further details in respect of daily cover, including its characteristics, depth of application, and how sufficient supplies of appropriate materials will be maintained at all times;

8. Specific controls that will be used to minimise the size of the working face, including periodic reviews to ensure that the controls continue to be effective;

9. A correct and clear description of when temporary capping will be applied, which corresponds to current guidance;

10. Full reference to flank cover, including appropriate planning, benching, and slope angles with a clear explanation of when WQL would implement such measures;

11. Reference to installation of sacrificial horizontal “scavenger” lines or pin wells;

12. Firm commitments to the appropriate deadlines by which permanent capping will be installed;

13. Revised text, specifically in

1. paragraph 3.2.2, which avoids suggesting WQL will not comply with any approved LFGMP where it is waiting for approval of a revised plan;

2. paragraph 3.2.6, which avoids suggesting that review/approval of the LFGMP by the Environment Agency is an integral part of WQL’s odour control strategy;

3. paragraph 3.2.7, which avoids suggesting that WQL's gas management contractor is responsible for controlling fugitive emissions of landfill gas;

14. A greater degree of detail and commitment by WQL in relation to leachate management, including the checks made on the leachate system, the use of the biofilter in the leachate treatment plant, its specification, how it is operated, monitored and maintained, how spillage and leakage of leachate is prevented, and the measures to manage emissions from leachate tanker filling

15. An appropriate table which draws together descriptions of the different monitoring regimes, including the parameters measured, details of who is responsible for conducting the monitoring, the frequency with which monitoring is carried out, and the location of results record.

16. A more detailed explanation of how WQL uses concentrations of hydrogen sulphide obtained following monitoring of the gas collection system and emissions of trace gases from surface monitoring to review odour management measures (paragraph 4.2.1): and an explanation of how existing action levels for hydrogen sulphide in the LFGMP are appropriate from a managing odour perspective;

17. A complete list of contingency measures with a focus on prevention rather than reaction. These might include on odour control from freezing weather, plant malfunction and power outage on site.

Deadline 02 April 2024

Action 2: Supply a copy of the revised OMP to the Environment Agency

Deadline 02 April 2024

Advice and Guidance issued by EA

2.27 The Compliance and Assessment Report dated 22 May 2024 issued the following advice and guidance regarding the discharge of liquid from a tanker.

'Officers discussed a report, including video footage, relating to possible acceptance of liquid waste.

WQL informed officers that liquid waste was not accepted for disposal. The on-site tanker had been used to remove liquid that had accumulated around the unloading pad, which was discharged onto the tipping area. The liquid was moved from one area to another in order to facilitate vehicular and plant access to the unloading bay.

WQL should treat such liquid as leachate, which includes liquid produced by the act of leaching, such as rainwater that has percolated over and through various areas of the landfill and become contaminated.

Your leachate management plan (LMP) should describe how this leachate is collected, treated, and disposed. You're existing LMP does not refer to any recirculation of leachate. If you wish to recirculate leachate to the landfill, the reasons and methods will need to be incorporated into your LMP'.

'**Action:** Stop discharging/re-circulating liquid in this manner. Provide a revised LMP by 19 June 2024, which demonstrates that you have considered and taken account of

the following guidance: <https://www.gov.uk/guidance/landfill-operators-environmental-permits/manage-leachate>

Impact Study

2.28 An Impact study, commissioned jointly by a group of public bodies, including Staffordshire County Council, Newcastle-under-Lyme Borough Council, the Environment Agency and UK Health Security Agency, will be carried out by the independent Arcadis Consulting and findings will be published later in the year.

2.29 Communities affected by emissions from a landfill site are to be involved in an independent study detailing their experiences. Researchers will talk directly to residents, businesses and schools to ask not only how the long-running problems at Walleys Quarry landfill in Newcastle have affected their physical and mental health, but how they may have influenced children's education, the local economy, community safety, the value of homes and other factors.

2.30 A copy of the press statement is available at:

<https://www.newcastle-staffs.gov.uk/news/article/254/wide-ranging-study-begins-into-impact-of-landfill-odours>

Key Performance Data

2.31 Through the settlement agreement both Walleys Quarry Ltd and the Council have developed key performance indicators in relation to relevant data from each organisation. These key performance indicators are shown in Appendix 2 and 3.

2.32 The data from the Council covers the period from April 2024 to June 2024 and provides complaint numbers and officer assessments.

2.33 The data from Walleys Quarry Limited provides data on waste acceptance, odour management, landfill operations, landfill gas management, leachate management and information relating to the EA regulator as the primary regulator of the site. The KPI data and explanatory notes for April and May is uploaded as Appendix 3 and the data for June will be uploaded when available.

3. Proposal

3.1 Cabinet is recommended to:

- Note the contents of this update report.

4. Reasons for Proposed Solution

4.1 To ensure Cabinet is kept updated of the ongoing work to address the issues associated with the odours from Walleys Quarry landfill and to keep under review opportunities to further action.

5. Options Considered

5.1 To provide regular updates to Cabinet.

6. **Legal and Statutory Implications**

6.1 Part III of the Environmental Protection Act 1990 is the legislation concerned with statutory nuisances in law. This is the principal piece of legislation covering the Council's duties and responsibilities in respect of issues relating to odour nuisance:

- The Environmental Protection Act 1990, section 79 sets out the law in relation to statutory nuisance. This is the principal piece of legislation covering the Council's duties and responsibilities in respect of issues relating to odour nuisance.
- The relevant part of Section 79 defines a statutory nuisance as any smell or other effluvia arising on industrial, trade or business premises which is prejudicial to health or a nuisance. The Council is responsible for undertaking inspections and responding to complaints to determine whether a statutory nuisance exists.
- Where a statutory nuisance is identified or considered likely to arise or recur, section 80 of the Act requires that an abatement notice is served on those responsible for the nuisance. The abatement notice can either prohibit or restrict the nuisance and may require works to be undertaken by a specified date(s).
- It is then a criminal offence to breach the terms of the abatement notice. Because the site is regulated by the Environment Agency under an Environmental Permit, the council would need to obtain the consent of the Secretary of State before it is able to prosecute any offence of breaching the abatement notice.
- The Act provides powers in respect of a breach. If a person on whom an abatement notice is served, without reasonable excuse, contravenes or fails to comply with any requirement or prohibition imposed by the notice, they shall be guilty of an offence. If this is on industrial, trade or business premises shall be liable on conviction to an unlimited fine. It is a defence that the best practicable means were used to prevent, or to counteract the effects of, the nuisance.

7. **Equality Impact Assessment**

7.1 The work of the Council in this regard recognises that the problematic odours in the area may impact on some groups more than others. The work is focussed on minimising this impact as soon as possible.

8. **Financial and Resource Implications**

8.1 Dedicated officer resource has been allocated to continue the Council's work regarding Walleys Quarry Landfill.

8.2 From April 2024 there is a £300k reserve for works associated with Walleys Quarry Landfill site. Should further funding be required, up to £300k can be made available through the transfer of useable reserves (£100k from the Borough Growth Fund and

£200k from the Budget and Borrowing Support Fund). These funds can be transferred without Council approval

- 8.3 Should proceedings regarding the breach of the Council's Abatement Notice exceed £600k, a further report will be presented to Council in order to seek approval to utilise funds from the General Fund Reserve.

9. Major Risks

9.1 A GRACE risk assessment has been completed including the following main risks:

- Failure to achieve a reduction in odour levels;
- Community dissatisfaction at odour levels;
- The ability to take enforcement action against abatement notice;
- Failure to evidence a breach of the abatement notice;
- Secretary of State refuses permission to undertake prosecution proceedings.

9.2 Controls have been identified and implemented in order to control these risks; the main controls include:

- Provisions in settlement agreement ensures greater transparency for public;
- Provisions in settlement agreement ensures regular meetings with Walleys Quarry which enable issues to be discussed;
- Dedicated officer resource for Walleys Quarry work has been secured;
- Continued air quality monitoring provision;
- Robust procedure for investigating complaints with experienced officers;
- Specialist expert advice maintained;
- Multi-Agency partnership working continues.

10. UN Sustainable Development Goals (UNSDG)



11. Key Decision Information

11.1 As an update report, this is not a Key Decision.

12. Earlier Cabinet/Committee Resolutions

12.1 This matter has been variously considered previously by Economy, Environment & Place Scrutiny Committee, Council and Cabinet on 21 April 2021, 9th June 2021, 7th July 2021, 21st July 2021, 8th September 2021, 13th October 2021, 3rd November 2021, 17th November, 1st December 2021, 12th January 2022, 2nd February 2022, 23rd February 2022, 23rd March 2022, 20th April 2022, 7th June 2022, 19th July 2022, 6th September 2022, 18th October 2022, 8th November 2022, 6th December 2022, 10th January 2023, 7th February 2023, 13th March 2023, 5th April 2023, 6th June 2023, 18th July 2023, 19th September 2023, 17th October 2023, 7th November 2023, 5th December 2023, 16th

January 2024, 6th February 2024, 14th February 2024, 19th March 2024, 10th April 2024,
4th June 2024.

13. List of Appendices

- 13.1** Appendix 1. Historical Complaint data
- 13.2** Appendix 2. NULBC Key Performance Data
- 13.3** Appendix 3. WQL Key Performance Data
- 13.4** Appendix 4. Percentage exceedance above WHO odour annoyance guideline