

NEWCASTLE-UNDER-LYME BOROUGH COUNCIL

CORPORATE LEADERSHIP TEAM'S

REPORT TO CABINET

09 January 2025

Report Title: Walleys Quarry – Odour Issues

Submitted by: Chief Executive

Portfolios: Sustainable Environment; One Council, People & Partnerships

Ward(s) affected: All

<p><u>Purpose of the Report</u></p> <p style="text-align: right;"><u>Key Decision Yes</u> <input type="checkbox"/> <u>No</u> <input checked="" type="checkbox"/></p> <p>To update Cabinet on the latest position regarding the problematic odours in the Borough associated with Walleys Quarry.</p>
<p><u>Recommendation</u></p> <p>Cabinet is recommended to:</p> <ol style="list-style-type: none"> 1. Note the contents of this update report. 2. Note the request for the Council to be a principal party in the appeal process as set out in section 2 of this report. 3. If participation on the terms set out in recommendation 2 is agreed by the Planning Inspectorate, to endorse the participation of the Council in that process.
<p><u>Reasons</u></p> <p>To ensure Cabinet is kept updated on the ongoing work regarding the problem odours associated with Walleys Quarry landfill.</p>

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. 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 needs 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. Such consent has been obtained.
- 1.5** Members and Officers have attended Liaison Meetings to maintain contact 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 September 2024, reported on a weekly basis. Historical complaint data is attached to this report as Appendix 1.

	Complaints to NuLBC	Complaints to Environment Agency
October 2024		
30/09/24 -06/10/24	52	147
07/10/24 -13/10/24	80	187
14/10/24 - 20/10/24	37	136
21/10/24 - 27/10/24	100	311
November 2024		
28/10/24 -03/11/24	46	163
04/11/24 – 10/11/24	41	153
11/11/24 – 17/11/24	251	793
18/11/24 – 24/11/24	252	842
25/11/24 – 01/12/24	518	1478
December 2024		
02/12/24 - 08/12/24	261	760
09/12/24 - 15/12/24	182	518
16/12/24 - 22/12/24	220	797
23/12/24 - 29/12/24	417*	1644

*Figure may alter due to backdated complaints received

- 2.2** The number of odour events (where 10 or more complaints have been reported) has increased to 26 in the month of December compared to 21 odour events reported in the month of November:

- Sunday 1 December
- Monday 2 December
- Tuesday 3 December
- Wednesday 4 December
- Thursday 5 December
- Friday 06 December
- Monday 09 December
- Thursday 12 December
- Friday 13 December
- Saturday 14 December
- Sunday 15 December
- Monday 16 December
- Tuesday 17 December
- Wednesday 18 December
- Thursday 19 December
- Friday 20 December
- Saturday 21 December
- Sunday 22 December
- Monday 23 December
- Tuesday 24 December
- Wednesday 25 December
- Thursday 26 December
- Friday 27 December
- Saturday 28 December
- Sunday 29 December
- Monday 30 December

- 2.3** There were 19 consecutive days where the community reported 10 or more odour complaints from 12 December to 30 December.
- 2.4** The highest number of odour complaints was reported on 3 December with 103 complaints and a monthly total of 1128 complaints. The second highest number of complaints was reported on 27 December at 98 complaints.
- 2.5** It is expected that the odour complaints will reduce as WQL undertakes the steps specified in the Schedule to the Closure Notice.

‘The EA has stated that it is ‘satisfied that stopping further waste entering the site will help reduce the odour potential. Capping the site will also help contain fugitive emissions of odorous landfill gas and increase the volume / rate of landfill gas extraction, preventing escape. These are steps required by the Closure Notice. We expect odorous emissions from the landfill to reduce over time’.

NULBC Odour Assessments

- 2.6** 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.

In December 22 spot assessments were undertaken of which 13 detected landfill related odour ranging from an intensity rating of 3 (distinct) to 4 (strong).

NULBC Mobile Air Quality Monitoring (using Jerome monitor)

- 2.7** Officers have monitored the levels of hydrogen sulphide within the community using the mobile Jerome monitor. The highest level of hydrogen sulphide [H₂S] recorded in the community was 15.63 ppb on 23 December 2024 at 08:48.

NULBC Actions

- 2.8** 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 any formal legal action it is necessary for the Council to formulate a view with regard to this matter, this is ongoing.
- 2.9** 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.
- 2.10** On 29 July 2024 the Rt Hon Steve Reed OBE MP, Secretary of State Environment, Food and Rural Affairs responded to the Leader's request for permission to prosecute Walleys Quarry Ltd. under statutory nuisance legislation, confirming that he would grant consent for the prosecution to proceed.
- 2.11** As reported in the previous Cabinet report the EA served a closure notice on Walleys Quarry Ltd on 28 November 2024. Walleys Quarry Limited subsequently submitted an appeal against the closure notice on 6 December [further details are contained in section 2.22 - 2.25]
- 2.12** The Council has sought urgent legal advice regarding the appeal process and how best to support the community in terms of challenging the appeal submitted by Walleys Quarry Ltd.
- 2.13** The Council is currently drafting a written representation as an 'interested party' to be submitted to the Planning Inspectorate on 13 January 2025.
- 2.14** The Council intends to request that the Planning Inspectorate considers the Council as a 'principal party' in the inquiry. If the Planning Inspectorate agrees to the request this potentially enables the Council to be a main party in the inquiry in the same way as the EA and WQL.
- 2.15** Cabinet will be informed of the decision by the Planning Inspectorate in due course.

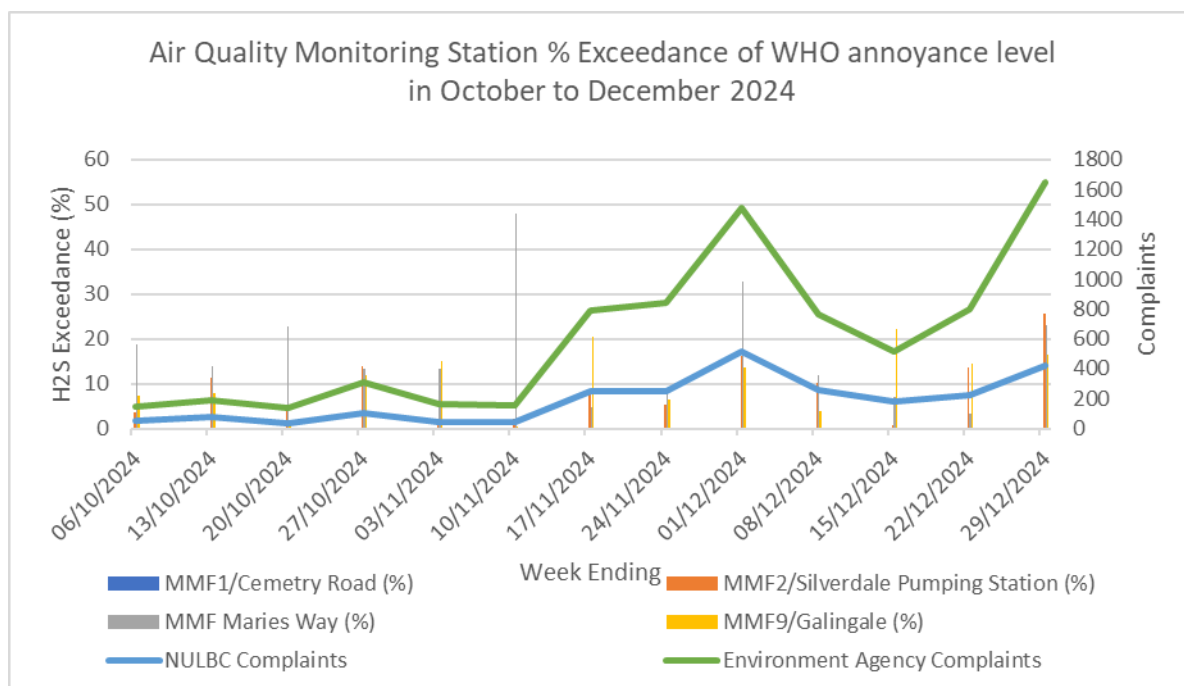
Air Quality

- 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 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 2.

Time Period	MMF Maries Way (%)	MMF Silverdale Pumping Station (%)	MMF Galinagle View (%)
07 October - 13 October 2024	14.0	11.3	8.0
14 October - 20 October 2024	22.8	5.09	1.8
21 October - 27 October 2024	13.4	14.0	12.0
28 October - 03 November 2024	13.2	1.5	15.0
04 November - 10 November 2024	47.9	2.1	0.3
11 November - 17 November 2024	4.8	7.49	20.4
18 November - 24 November 2024	8.0	5.4	6.5
25 November - 1 December 2024	32.7	16.1	13.7
2 December - 8 December 2024	11.9	10.3	3.9
9 December - 15 December 2024	7.1	0.6	22.3
16 December - 22 December 2024	3.3	13.6	14.5
23 December - 29 December 2024	22.9	25.6	16.4

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



Environment Agency Regulatory and Enforcement Action

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

2.20 There have been no further Compliance and Assessment Reports published on the EA website since the previous Cabinet report(s).

2.21 On 03 January 2025 the EA acknowledged the increase in complaints week commencing 23 December:

'Recent Odour

We are aware that there was substantial odour around Walleys Quarry in the week commencing 23 December 2024. We have every sympathy with members of the local community who were affected. Dispersal conditions were particularly poor during this period of cold, still weather.

On 20 December 2024 officers identified an area of the site with high levels of landfill gas. We are discussing appropriate remedial action with Walleys Quarry Ltd (WQL).

We expect odour outside the site to reduce as the additional gas infrastructure and capping required by the Closure Notice are completed. WQL is making progress with this work. WQL published a further website update on 02 January 2025, which you can read [here](#)

Reporting an Odour

It is really important that you continue to report any odour you experience around Walleys Quarry. Please call our hotline number on 0800 80 70 60 or click the link below to report through our online form.

<https://report-walleys-quarry-smell.service.gov.uk/>

Sources of Health Advice

We recommend that you speak to your general practitioner if you have any health concerns.

You may also wish to consult: [Frequently asked questions about the health effects of odours and emissions from Walleys Quarry - Staffordshire County Council](#)

Closure Notice

2.22 On 28 November 2024 the Environment Agency issued a Closure Notice to Walleys Quarry Ltd (WQL).

2.23 The Schedule to the Closure Notice requires WQL to comply with steps to initiate closure. The steps specified in the Schedule are summarised in the table below:

Schedule 2	Timescale	Steps
Stage 1 Step 1	From 00:01 on 29 November 2024	Cease accepting waste and do not recommence the acceptance of waste for disposal or recovery at the landfill
Stage 1 Step 2	By 13 December 2024	Construct bench-like horizontal platforms within the waste flanks on the uncapped former active tipping (operational) areas to facilitate access, maintenance and monitoring for the installation of gas control infrastructure (gas wells and connecting pipelines).
Stage 1 Step 3		Any waste left exposed following construction of bench like horizontal platforms in the former active area tipping (operational) areas shall be covered with non-waste material by the end of each working day.

Stage 1 Step 4	By 24 December 2024	Install permanent gas extraction wells as set out in Walleys Next Phase Gas Infrastructure Design 18.11.2024 reference CLP3573 and in those former active tipping (operational) areas without gas extraction, in accordance with the design and specification set out in the LGMP
Stage 1 Step 5		Connect all installed gas extraction infrastructure to the operational gas control system and place it under extraction. This shall occur no later than the end of the day of installation of the specific infrastructure
Stage 1 Step 6	By 31 January 2025	Install temporary geomembrane capping to any uncapped part of the former active tipping area of the landfill. Once installed, the capping shall alleviate gas emissions so that they do not exceed 50 parts per million (ppm) methane.
Stage 1 Step 7		Collect and remove surface water run-off from capped areas in accordance with Temporary Surface Water Management Layout, drawing ECL. 9311.D05.001 Rec C dated 10.07.2024. Any contaminated surface water shall either be removed from site or treated via leachate treatment plant.
Stage 1 Step 8	By 7 February 2025	A surface gas emissions survey shall be undertaken in accordance with LFTGN07 v2 2010 Guidance on monitoring landfill gas surface emissions
Stage 1 Step 9	By 14 February 2025	Submit a report to the EA demonstrating that emissions of methane do not exceed 50 parts per million (ppm) methane.
Stage 1 Step 10	From 14 February 2025	Conduct surface gas emission surveys every four weeks until the permanent cap is installed to ensure that the temporary cap is alleviating methane emissions to below 50ppm.
Stage 1 Step 11	No later than 7 days after each survey carried out in accordance with Step 10 above	Submit a report to the EA demonstrating that emissions of methane do not exceed 50ppm methane
Stage 1 Step 12	Within 24 hours from detection	Repair any defects or leaks in the cap giving rise to methane emissions greater than 50ppm methane
Stage 1 Step 13	By 28 February 2025	Provide the EA with a Landfill Closure and Aftercare Plan [Refer to the Closure Notice for the relevant sector guidance]
Stage 2 Step 1	By 30 May 2025 or such date agreed in writing by the EA	Provide the EA with a closure report which specifies how closure has been achieved and how the activities at the site will be managed, monitored and maintained during the aftercare phase. [Refer to Closure Notice for the relevant sector guidance]

Appeal against Closure Notice

- 2.24** On 9 December the EA updated on their Latest News webpage that on Friday 6 December 2024, the EA were notified that WQL had submitted an appeal form in respect of the Closure Notice.

“For this reason, it is no longer appropriate to answer questions about the Notice as we had planned. It is therefore necessary to cancel the public meeting due to be held Monday 9 December 2024 at 7.00pm.

The appeal will be determined by an Inspector appointed by the Planning Inspectorate (PINS). Walleys Quarry Ltd has asked that its appeal is heard by an Inspector at an inquiry.

The statutory appeals procedure affords interested parties an opportunity to make representations to the Inspector at the appropriate time. You can read more about the procedure on the PINS website here: [environmental permit guidance on the appeal procedure\(External link\)](#).

We will continue to update our website when we can. Information about the Notice, including a frequently asked question section, can be found on our [closure notice Engagement HQ page](#).”

- 2.25** Interested parties have an opportunity to make representations to the Planning Inspectorate. Please note that any representations on this appeal, must be submitted in writing by 13 January 2025. Any representations made to the Inspectorate will be copied to WQL and the EA. Further detail is set out in the EA’s letter to ‘Interested Parties’ set out in Appendix 4 to this report.

- 2.26** The letter states that WQL “disputes the decision to, and grounds for serving the notice”.

“WQL has indicated that:

- It believes the Closure Notice is an unlawful exercise of the Environment Agency’s powers, and permit variation or revocation would have been more appropriate to secure the immediate cessation of waste acceptance.
- The steps in the Closure Notice are not sufficiently clear or detailed.
- The Environment Agency has failed to have regard to the Landfill Directive.
- WQL was not provided an opportunity to make representations about the steps in the Closure Notice.
- The reasons for decision to issue the Closure Notice are flawed.
- The Environment Agency has acted unreasonably, and substantial unfairness has resulted”

- 2.27** Where an appeal is brought against a closure notice or to initiate a closure procedure, the appeal will not suspend the notice.

Walleys Quarry update

- 2.28** On 5 December WQL issued the following press information of their website:

“The acceptance of waste material at Walleys Quarry is currently prohibited following receipt of the closure notice by the Environment Agency.

Over the coming weeks Walleys Quarry will undertake engineering work to create “benches”, (platforms that enable the installation of gas collection infrastructure).

These works are unlikely to be seen from off-site because of their location, however given Walleys Quarry is not able to import wastes including waste soil to form these benches or use waste soil that is already stockpiled on site to form them the Agency has compelled us to take the unusual step of cutting into already emplaced waste to create them.

This is not standard practice in the UK and carries increased risk of odour evolution and operational safety for those working to create them. Walleys Quarry will monitor the activity and attempt to complete the works as quickly as practicable”.

2.29 WQL released further press information the same day:

“The acceptance of waste material at Walleys Quarry is currently prohibited following receipt of the closure notice by the Environment Agency.

Walleys Quarry will continue to undertake engineering work at the site. This includes the importation of product clay as an engineering material.

Over the coming weeks Walleys Quarry will have heavy goods vehicles delivering clay to the site to support the engineering requirements onsite.

This activity is not covered by the closure notice.”

2.30 On 11 December 2024 the following press information was published:

“The acceptance of waste for Landfilling at Walleys Quarry (WQ) is currently prohibited following receipt of the closure notice by the Environment Agency.

Over the coming weeks WQ will undertake drilling of additional gas collection wells, and associated infrastructure. This work was planned to occur before the closure notice was issued and WQL will continue to lead on it.

WQ has a specialist landfill gas contractor to undertake the work, and a drilling rig may be visible offsite.

Given the nature of the works (drilling into landfilled waste), the specialist drilling contractor will continue to use equipment that incorporates extraction to minimize the risk of off-site odour.

These landfill gas collection wells will form part of the infrastructure to capture, and process landfill gas on the site.”

2.31 The Liaison meeting planned for 17 December 2024 was postponed following the receipt of a closure notice. WQL will provide updates to the Liaison Committee via email regarding the site and provide a new date for the Committee to convene.

2.32 On 2 January 2025 the following update was published by WQL:

“Temporary Capping Works Scheduled for January 2025

Starting on 6th January 2025, Walleys Quarry will begin the process of temporarily capping in the southwest area of the site, located adjacent to the leachate treatment plant.

What to Expect

•**Visibility of Works:** Due to the location of the work there will be minimal visible activity for the surrounding community. However, there may be some additional vehicle movements as the specialist lining crew accesses and exits the site.

•**Work Details:** The process involves laying plastic geomembrane sheeting over the current active area of the landfill.

Timeline

The works are expected to be completed by 31st January 2025, although progress may be impacted by weather conditions.

Who Is Carrying Out the Work?

The capping works will be undertaken by specialist contractor

We appreciate your understanding during this time”.

Scrutiny- Committee of Inquiry

- 2.33** A member-led committee of inquiry has been set up to look at the impact on local communities from the Walleys Quarry Landfill operation.
- 2.34** The specific lines of inquiry have been determined by Full Council and are as follows:
- What is the impact of the ongoing odour issue?
 - What needs to be done next, and by whom, to bring about resolution?
 - What, if any, opportunities have been missed to resolve this issue sooner?
- 2.35** The summary was presented to Full Council on 25 September 2024.
- 2.36** There have been no major changes to the completed or active recommendations since the last Cabinet report.

Impact Study

- 2.37** 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.
- 2.38** The Health and Care Overview and Scrutiny Committee at Staffordshire County Council considered the report at its meeting on 2 December 2024.

Key Performance Data

- 2.39** Through the settlement agreement both Walleys Quarry Ltd and the Council have developed key performance indicators in relation to relevant data from each organisation. The key performance indicator for NuLBC are shown in Appendix 3.
- 2.40** The data from the Council covers the period from October 2024 to December 2024 and provides complaint numbers and officer assessments.
- 2.41** 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 from September onwards has not been submitted by the operator.

3. **Recommendation**

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 On 20 November 2024 Council approved the sum of £400k (£250k from the General Fund Reserve, £150k from the Budget and Borrowing Support Fund) for costs associated with action to prosecute, and delegate to the Chief Executive and Section 151 Officer, in consultation with the Portfolio Holders for One Council, People and Performance and Town Centres and Finance, to draw down and remit such funds as are necessary for this action.

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;

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. One Council

11.1 Please confirm that consideration has been given to the following programmes of work:

One Commercial Council

One Digital Council

The Council will use all available monitoring data and digital tools in making strategic and operational decisions in relation to Walleys Quarry.

One Green Council

The Council is not a user of Walleys Quarry. Within its restricted powers, the Council is committed to ensuring that waste does not cause a nuisance for residents and ultimately wishes to see the end of landfill, with a site that is successful closed, capped off and restored.

12. Key Decision Information

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

13. Earlier Cabinet/Committee Resolutions

13.1 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, 16th July 2024, 10th September 2024, 25th September 2024, 15th October 2024, 5th November 2024, 25th November 2024. 3rd December 2024

14. List of Appendices

- 14.1 Appendix 1. Historical Complaint data
- 14.2 Appendix 2. Percentage exceedance above WHO odour annoyance guideline
- 14.3 Appendix 3. NULBC Key Performance Data
- 14.4 Appendix 4. EA Letter to Interested Parties