



AC
ENVIRONMENTAL
CONSULTING

Environmental Management System Summary

Equestrian Surfaces Limited

Phoenix Works, Phoenix Way,
Burnley BB11 5SX

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Equestrian Surfaces Limited

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Environmental Management System Summary

This Environmental Management System has been prepared by AC Environmental Consulting Ltd for the Equestrian Surfaces Limited site located at Phoenix Works, Phoenix Way, Burnley BB11 5SX.

1. LOCATION

The management system details the geographical context of the site, including nearby infrastructure, sensitive receptors (like residential or commercial areas), and environmental designations. This information is essential for effectively evaluating the risks posed by the site's location relative to human populations, properties, and natural environments.

2. HISTORY

The management system incorporates a historical overview of how the site has been used over time. It includes reference to past industrial or agricultural activities and any known or suspected contamination. This informs baseline environmental assessments and helps identify legacy risks.

3. SITE DESIGN

3.1 The management system outlines the physical layout and infrastructure of the site, such as buildings, storage areas, drainage, and access routes. It also explains how the site is configured to support operations safely and to minimise environmental impacts through design features like impermeable surfacing and containment systems.

3.2 The management system includes a working plan drawn to scale, which details the layout of the site. This drawing will also include:

- Site access
- Location of site infrastructure
- Storage facilities
- Entrances and exits
- Location of any discharge points
- Location of stored wastes

- Drainage details (including the direction of flow of water into the drain, locations of manhole covers and drains, location of discharge points, etc.)

3.3 In addition to the site's layout and infrastructure, there will also be a plan which identifies the location of any receptors that may be vulnerable to pollution as a result of the site's operations.

3.4 In accordance with Section 13 (Review of Management System), the site plan will be reviewed and may be amended if there are any changes to site operations that may affect the layout of the site. The plan may also be updated if there are any changes to nearby receptors.

4. SITE OPERATIONS

4.1 The management system will comprise documented procedures for all site operations. These procedures will also provide details of what measures will be undertaken in order to prevent or minimise the environmental risk from site operations.

4.2 All operational procedures will be reviewed on an annual basis as part of the management system (Section 13) and under the following circumstances:

- After any accident, complaint, or breach of the Environmental Permit.
- A need to amend procedures is identified following a near miss investigation.
- A need to amend procedures is identified following an incident investigation.
- Legislative requirements change resulting in a need to alter procedures.
- Changes to site operations.

4.3 The management system will include a waste storage plan which includes the following:

- The longest amount of time that each waste type will be stored and the criteria in place to ensure this is not exceeded.
- The maximum volume of each type of waste to be stored on-site.
- How the operator will separate different types of waste where required.
- Waste acceptance procedures to ensure the only the wastes within the permit are accepted on site.

4.4 A planned maintenance programme for all vehicles and plant used for daily activities is incorporated into the site's management system to minimise the risk to safety, health, and the

environment by ensuring that all appropriate items and elements within the site are served and inspected on a regular basis or to the manufacturer's maintenance schedules.

4.5 Details of faults, breakdowns and repairs will be documented, and records which will be maintained by the operator. Faults and breakdowns will be investigated, and the service schedule will be revised if necessary.

4.6 A Site Condition Report (SCR) for the site is provided in Appendix 6 of the Environmental Management System.

4.7 The SCR provides an assessment of the site's current condition, including details of any past uses, historic pollution events and the environmental characteristics of the site.

4.8 The report concluded that there had been no historical contamination prior to activities commencing on site, no significant breaches have been reported, and no concerns have been raised by the EA since the land was purchased by the Operator.

4.9 In the event of any incident on-site, a report will be produced to include details of the incidents, measures that were undertaken, and the effectiveness of these measures to protect the land or groundwater. This information will demonstrate that the necessary measures were undertaken to avoid any pollution risk at the point the operator seeks to surrender the environmental permit.

5. CONTINGENCY PLANS

5.1 All operational procedures will comprise contingency plans which details what actions will be undertaken in the event of any breakdown, enforced shutdowns and any changes to normal operations (e.g., flooding, or extreme weather). This will ensure that the necessary measures are employed to minimise the environmental risks arising from abnormal operating conditions.

5.2 Plans include ceasing operations during breakdowns, fires, or floods, deploying barriers, halting deliveries, and informing authorities.

6. ACCIDENT PREVENTION AND MANAGEMENT PLAN

6.1 The Accident Prevention and Management Plan will identify potential accidents that could arise from the site's operations, and the environmental consequences of those accidents. It will also provide details on how the operator will reduce the likelihood of accidents and indicates how the operator will respond should any such events occur.

6.2 The Accident Prevention and Management Plan will be reviewed on an annual basis and under the following circumstances: -

- After any accident or complaint.
- Changes to site operations that may affect the likelihood of accidents.
- Changes to emergency contacts.

7. A CHANGING CLIMATE

7.1 Climate risks like flooding and extreme heat are addressed through a dedicated climate change risk assessment (Appendix 5) and appropriate mitigation measures.

7.2 As part of the review process (Section 13), the Operator will consider whether the site's operations could be affected by a changing climate which may include the delivery of the site's Accident Prevention and Management Plan and Contingency Plans.

8. PERSONNEL AND DUTIES

8.1 A defined management structure (Appendix 1) ensures roles and responsibilities are clear and accountable.

9. STAFF COMPETENCE AND TRAINING

9.1 To ensure that the site is operated by personnel who are suitably trained, the operator will maintain a record which identifies each job role and the training requirements for each role. This will be monitored against a training checklist which will identify whether each member of staff has received the required training to undertake their role on site.

9.2 The operator will also maintain a record of all training, experience and qualifications of staff and kept will be kept up to date. Toolbox talks and ongoing assessments ensure continued competence.

9.3 The training requirements and training checklist for all personnel will be reviewed on annual basis as part of the management system review (Section 13) and in the event of any significant alterations to the site operations or procedures.

10. RECORDS

10.1 Records are maintained for waste, training, inspections, maintenance, incidents, and reviews. Stored digitally and in hard copy on-site, this will include the following:

- Environmental permits and variation notices issued to the site.
- Risk assessment for site operations.
- Any plans that are required by the Environmental Permit.
- Operating procedures.
- Staff competence and training.
- Compliance checks, findings of investigation and actions taken.
- Complaints made, findings of investigation and actions taken.
- Audits of management system, findings and actions taken.
- Management reviews and changes made to the management system.

10.2 These documents will be kept in a convenient location on site, allowing access for any person that may be working or visiting the site.

11. FIRE CONTROL AND PREVENTION PROVISIONS

11.1 A Fire Procedure will be provided within the site's management system which details the mechanisms in place to prevent a fire on site alongside the procedure to be undertaken should a fire arise.

11.2 A Fire Prevention Plan has also been provided alongside the permit application which identifies the potential causes and effects of a fire and describes the measures that will be in

place to prevent the occurrence of a fire at the site. In addition, the report provides details on the planned response to a fire incident and explain how fire water would be contained.

12. COMPLAINTS

12.1 A complaints procedure is incorporated into the site's management system to ensure that complaints will be handled by the operator to reassure the Environment Agency and the public that any of their concerns will be acknowledged and acted upon where appropriate. The procedure will be reviewed on an annual basis as part of the management system review (Section 13) or in the event of any significant complaints.

12.2 A notice board / sign will be situated at the site entrance which details the operator's and the Environment Agency's contact details. This will ensure that any member of the public can report their complaint and be confident that it will be received by the appropriate party even if they do not wish to discuss their complaint directly with the operator.

12.3 Any complaint that is received by the operator will be investigated in order to identify the cause of the complaint. Once established, necessary actions will be undertaken to prevent re-occurrence.

12.4 The operator will maintain a record of all complaints, how the complaint was investigated and any actions that were undertaken as a result of the complaint.

13. REVIEW OF THE SYSTEM

13.1 The management system will be reviewed on an annual basis to ensure compliance with the relevant guidance and regulations. The management system will also be reviewed under the following circumstances: -

- After any accident, complaint or breach of the Environmental Permit.
- Changes to the site or operations that will require the Environmental Permit to be varied (changed).
- If a new environmental problem or issue is encountered on site and a new control measure has been implemented.

13.2 The operator will maintain a record of any changes to the management system. Staff are also trained on any changes.