



# **Environmental Risk Assessment & Emissions Plan**

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Hallen Yard**

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## **1 SCOPE**

Bristol & Avon (the operator) are applying to increase the site's annual waste throughput to 450,000 tonnes per annum, amend the existing operating hours and install a bespoke wash plant in order to facilitate the recovery of materials and saleable aggregates from the waste delivered to the site.

## **2 SITE DESCRIPTION**

### **2.1 Site Location**

The site is located at National Grid reference ST54623 81083, within an area of undeveloped farmland approximately 800 m to the northwest of Hallen, 2 km to the east of the Severn Estuary and 2.5 km to the north of Avonmouth, as shown on Site Location Map, drawing No. 2763-772-01.

The Site is situated in an area that is characterised by a patchwork of fields separated by drainage ditches and hedgerows with occasional mature trees. The fields were predominantly used for grazing livestock. Immediately to the north of the Site is a significant drainage ditch called Monks Well, beyond which is a gas works. The Site is located approximately 30m to the northwest of the M49 motorway. There is a small, unnamed drainage ditch to the south of the Site, beyond which there is an embankment that leads up to Severn Road. The land to the west of the Site comprises a former field that has recently been raised in preparation for development. There is also a small industrial to the west of the Site.

The site is fairly level, averaging at 7.45 AOD.

### **2.2 Planning**

This development was granted Planning Permission by Gloucestershire County Council Reference number: PT16/4744/MW.

## **3 ENVIRONMENTAL SENSITIVITY**

### **3.1 Sites of environmental importance**

The site is located more than 1km of a site of environmental importance. It is situated 2km from The Severn Estuary, which is designated a SSSI.

The site is located 200m from Local Wildlife Site (LWS) and up to 500m from a Coastal and Floodplain grazing marsh. The protection of these Nature and Heritage Conservation sites has been addressed in the Ecological report, ref BATPA0806 and subsequent letter received from Environ (January 2014). There is no pathway to these sensitive sites and a holding pond is being constructed as mitigation to control any potential escape of surface waters from the site.

## **3.2 Geology and hydrogeology**

Bedrock beneath the site comprises the Mercia Mudstone Group (previously known as the Lower Keuper Series) which comprises mudstone and halite-stone. This is a sedimentary deposit. The Mercia Mudstone Group is classified as a Secondary B Aquifer (reference: Environment Agency Groundwater map), defined as ‘predominantly lower permeability layers which may store and yield limited amounts of groundwater due to localised features such as fissures, thin permeable horizons and weathering’.

Superficial deposits are also present at the site, comprising Tidal Flat deposits (clay and silt). These deposits are identified as ‘unproductive strata’, which are defined as ‘layers of drift deposits with low permeability that have negligible significance for water supply or river base flow’.

According to the classifications given by the Cranfield National Soil Resources Institute, the predominant soil type on-site is ‘loamy and clayey soils of coastal flats with naturally high groundwater’. The higher ground to the southeast of the site is characterised by soils which are ‘slowly permeable, seasonally wet, slightly acidic but base-rich loamy and clayey’, whilst the slopes leading towards site are ‘slightly acid loamy and clayey, with impeded drainage’.

### **3.2.1 Watercourses and Drainage**

The site is adjacent to two drainage channels: Monks’ Well Rhine to the northeast and an unnamed channel to the southwest. These channels are typically some 4 m wide. The southwestern channel is identified in the SFRA as “ditch south of Willow Farm”. These watercourses are perennial (flowing under all conditions) and drain north-westwards to the Severn Estuary. They are classified as ordinary watercourses and had slight but discernible flow at the time of the site visit. Each watercourse is conveyed under the motorway in concrete pipes of approximately 600 mm diameter. The motorway appears to drain to peripheral ditches which discharge to these watercourses.

The site is bounded to the northwest by a shallow, heavily vegetated and dry drainage channel which only flows under storm conditions. Maps and aerial photographs show that the site was previously crossed by minor dry drainage ditches, which have been filled as the site has been levelled with imported soil. All drainage ultimately discharges to the Severn Estuary. The developed site is drained by two concrete pipes which flow to an oil-water interceptor at the northern corner of the site, prior to discharge into Monks’ Well Rhine. The yard areas used for waste storage and the entrance road are surfaced with concrete.

### **3.2.2 Groundwater**

The site is not located within a source protection zone.

### **3.2.3 Surface water**

The majority of the site is drained by land drains and ditches which run along the Northern and Southern site boundary.

The proposed site will be laid to an impermeable hardstanding, where clean runoff is drained to interceptors. There will be a holding pond in the north west area of the site to contain surface waters during the construction phase and used as a wildlife pond following development of the site.

## 4 CONTROL OF WASTES

The acceptance of wastes onto the site will be restricted to those set out in Table 1, which is set out within the Environment Permitting (England and Wales) Regulations 2007.

**Table 1. Waste Codes**

Waste Code	Description
<b>01</b>	<b>Wastes resulting from exploration, mining, quarrying and physical and chemical treatment of minerals</b>
01 01	Mineral excavation
01 01 01	wastes from mineral metalliferous excavation
01 01 02	wastes from mineral non-metalliferous excavation
01 04	Wastes from physical and chemical processing of non-metalliferous minerals
01 04 08	Waste gravel and crushed rock other than those containing dangerous substances
01 04 09	Waste sand and clays
01 04 11	wastes from potash and rock salt processing other than those mentioned in 01 04 07
01 04 13	wastes from stone cutting and sawing other than those mentioned in 01 04 07
<b>02</b>	<b>WASTES FROM AGRICULTURE, HORTICULTURE, AQUACULTURE, FORESTRY, HUNTING AND FISHING, FOOD PREPARATION AND PROCESSING</b>
02 02	Wastes from the preparation and processing of meat, fish and other foods of animal origin
02 02 02	Shellfish shells from which the soft tissue or flesh has been removed only
<b>03</b>	<b>WASTES FROM WOOD PROCESSING AND THE PRODUCTION OF PANELS AND FURNITURE, PULP, PAPER AND CARDBOARD</b>
030101	Waste bark and cork
03 03	Waste from pulp, paper and cardboard production and processing
030301	Waste bark and wood
030309	lime mud waste
<b>10</b>	<b>WASTES RESULTING FROM EXPLORATION, MINING, QUARRYING, AND PHYSICAL AND CHEMICAL TREATMENT OF MINERALS</b>
10 01	Wastes from power stations and other combustion plants (except 19)
10 01 02	Coal fly ash
10 01 05	Calcium-based reaction wastes from flue-gas desulphurization in solid form
10 01 07	Gypsum (sludge) only
10 01 15	Bottom ash, slag, and boiler dust from co-incineration other than those mentioned in 10 01 14
10 01 17	fly ash from co-incineration other than those mentioned in 10 01 16

Waste Code	Description
10 01 24	sands from fluidised beds
10 02	
10 02 01	wastes from the processing of slag
10 02 02	unprocessed slag
10 02 08	solid wastes from gas treatment other than those mentioned in 10 02 07
10 09	
10 09 03	furnace slag
10 09 06	casting cores and moulds which have not undergone pouring other than those mentioned in 10 09 05
10 09 08	casting cores and moulds which have undergone pouring other than those mentioned in 10 09 07
10 09 10	flue-gas dust other than those mentioned in 10 09 09
10 09 12	other particulates other than those mentioned in 10 09 11
10 09 14	waste binders other than those mentioned in 10 09 13
10 09 16	waste crack-indicating agent other than those mentioned in 10 09 15
10 10	
10 10 03	furnace slag
10 10 06	casting cores and moulds which have not undergone pouring, other than those mentioned in 10 10 05
10 10 08	casting cores and moulds which have undergone pouring, other than those mentioned in 10 10 07
10 10 10	flue-gas dust other than those mentioned in 10 10 09
10 10 14	waste binders other than those mentioned in 10 10 13
10 10 16	waste crack-indicating agent other than those mentioned in 10 10 15
10 11	Waste from manufacture of glass and glass products
10 11 03	waste glass-based fibrous materials
10 11 10	waste preparation mixture before thermal processing, other than those mentioned in 10 11 09
10 11 12	Clean glass other than those mentioned in 10 11 11
10 11 16	solid wastes from flue-gas treatment other than those mentioned in 10 11 15
10 11 20	solid wastes from on-site effluent treatment other than those mentioned in 10 11 19
10 12	Waste from manufacture of ceramic goods, bricks, tiles and construction products
10 12 01	waste preparation mixture before thermal processing
10 12 06	discarded moulds
10 12 08	Waste ceramics, bricks, tiles and construction products (after thermal processing)
10 12 10	solid wastes from gas treatment other than those mentioned in 10 12 09
10 12 12	wastes from glazing other than those mentioned in 10 12 11
10 13	Wastes from manufacture of cement, lime and plaster and articles and products made from them
10 13 01	waste preparation mixture before thermal processing

Waste Code	Description
10 13 04	wastes from calcination and hydration of lime
10 13 14	Waste concrete only
<b>15</b>	<b>WASTE PACKAGING; ABSORBENTS, WIPING CLOTHS, FILTER MATERIALS AND PROTECTIVE CLOTHING NOT OTHERWISE SPECIFIED</b>
15 01	Packaging (including separately collected municipal packaging waste)
15 01 07	Glass packaging
16 01 20	glass
16 03 04	inorganic wastes other than those mentioned in 16 03 03
<b>17</b>	<b>Construction and demolition wastes (including excavated soil from contaminated sites)</b>
17 01	Concrete, bricks, tiles and ceramics
17 01 01	Concrete
17 01 02	Bricks
17 01 03	Tiles and ceramics
17 01 07	Mixture of concrete, bricks and tiles
17 02	Wood, glass and plastic
17 02 02	glass
17 03	Bituminous mixtures, coal tar and tarred products
17 03 02	Bituminous mixtures other than those mentioned in 17 03 01
17 05	Soil (including excavated soil from contaminated sites) stones and dredging spoil
17 05 04	Soil and stones
17 05 06	Dredging spoil other than those mentioned in 17 05 05
17 05 08	Track ballast other than those mentioned in 17 05 07
17 08	Gypsum-based construction material
17 08 02	Gypsum based construction materials other than those mentioned in 17 08 01
<b>19</b>	<b>Wastes from waste management facilities, off-site waste water treatment plants and preparation of water intended for human consumption and water for industrial use</b>
19 01	Incineration or pyrolysis of waste
190112	bottom ash and slag other than those mentioned in 19 01 11
190114	fly ash other than those mentioned in 19 01 13
190116	boiler dust other than those mentioned in 19 01 15
190118	pyrolysis wastes other than those mentioned in 19 01 17
190119	sands from fluidised beds
19 05	Wastes from aerobic treatment of solid wastes
19 05 03	Off specification compost
19 08	Waste from waste water treatment plants not otherwise specified
19 08 02	Washed sewage grit (waste from desanding) free from sewage contamination only
19 08 99	Stone filter media if free from sewage contamination only

Waste Code	Description
19 09	Wastes from the preparation of water intended for human consumption or water for industrial use
19 09 02	Sludges from water clarification
19 12	Waste from the mechanical treatment of waste (for example sorting, crushing, compacting, pelletising) not otherwise specified
191205	Glass
191209	Minerals (for example sand, stones)
191212	other wastes (including mixtures of materials) from mechanical treatment of wastes other than those mentioned in 19 12 11
19 13	Wastes from soil and groundwater remediation
19 13 02	Solid wastes from soil remediation other than those containing dangerous substances
19 13 04	Sludges from soil remediation other than those mentioned in 19 13 03
<b>20</b>	<b>Municipal wastes (household waste and similar commercial, industrial and institutional wastes) including separately collected fractions</b>
20 01	Separately collected fractions (except 15 01)
20 01 02	glass
20 02	Garden and park wastes (including cemetery waste)
20 02 02	Soil and stones
20 03	Other municipal wastes
20 03 03	street-cleaning residues

#### 4.1 Traffic Management Plan

A Traffic Management Plan was conducted on 30th June 2023, Appendix B

The site currently operates as an existing waste recycling facility which accepts up to 250,000 tonnes per annum of construction and demolition wastes which are processed into re-usable aggregate products.

The proposals include a new wash plant which will increase the efficiency of the recycling operation whilst also reducing the amount of material that needs to be stored on site. As a result of this increase in recycling efficiency, an increase in waste throughput is proposed, which will increase the throughput to 450,000 tonnes of construction and demolition wastes per annum, thus also enabling the operator to meet increased demand for recycled products. In order to accommodate the increased demand, an extension to existing operational hours is proposed. The envisaged daily operating hours at the site are summarised below:

- 06:30 to 16:30 – 10 hour working shift
- 16:30 to 17:30 – Site maintenance/shut down
- 17:30 to 03:30 – 10 hour working shift
- 03:30 to 04:30 – Site maintenance/shut down

Details of the agreed access/egress routes will be issued to all staff suppliers and subcontractors. In addition, verbal and written briefings will be provided to all staff suppliers, contractors and visitors in order to make them aware of the process that they should adhere to when accessing the site. The local roads within the vicinity of the site have been reviewed. In the vicinity of the site, Severn Road has a carriageway width of approximately 7.3m and Chittening Road has a carriageway width of approximately 9.0m.

The local roads already accommodate regular HGV movements and have no restrictions for HGVs. Any unsuitable routes for large equipment will be communicated to all parties.

Access to the site will be provided via the existing access road which provides a connection to Severn Road to the southwest of the site.

The site entrance is approximately 400m from Severn Road and therefore a significant distance from the adopted highway. A gatehouse will be provided at the site entrance in order to monitor vehicles entering and leaving the site and prevent queueing.

#### **4.2 Potentially Contaminated Sites**

Where it is proposed to import soils and stones from sites that may have been used historically and where contamination may have occurred these will only be accepted following receipt of the necessary contamination reports, sampling methodologies and analysis.

To ensure that the waste is suitable for use site specific waste acceptance criteria is developed based on the existing site conditions and final end use.

Where necessary we may undertake further sampling of material being brought to site to ensure its suitability and ensure that it does not pose a risk to human health, amenity or the environment.

#### **4.3 Waste Acceptance Criteria**

Due to the amount of waste typically used at sites such as this and the inability at this early stage to identify exactly where the material is likely to come from this is a useful way of detailing what wastes will be used. We have considered both environmental and human health impacts and have used thresholds derived from the CLEA Soil Guideline, GAC and the Landfill Regulations, outlined in Table 2.0.

**Table 2. Threshold values for the final finished levels**

Hazard	Determinand	Threshold (mg/kg)	Assessment Guidance used
Human Health Risks: Site End users	Arsenic	640	CLEA SGVS Commercial & Industrial
	Cadmium	230 (pH 8)	
	Chromium	5000	
	Lead	750	
	Inorganic Mercury	3600	
	Nickel	1800	
	Selenium	13000	
	Total Phenols	15	CLEA SGVS Residential without plant uptake assuming 5% organic matter
	Toluene	15	
	Ethyl benzene	80	
	Polyaromatic Hydrocarbons	100	Landfill Regulations. Technical Guidance WM2
	Mineral Oils	1000	
	PCBs (7 congeners)	1	
	Free Cyanide	20	Dutch intervention values
Asbestos	No presence		
Phytotoxicity	Copper	250	MAFF guidance on Phytotoxicity
	Zinc	1000	

#### 4.3.1 Human Health

Where available the threshold values are derived from published Soil Guideline Values (SGVs) or Generic Assessment Criteria (GACs). The SGV is defined, as the concentration below which there is “no significant possibility of significant harm to human health”. We have used the ‘Commercial & Industrial End Use’ guidelines due to the existing and future use of the site. The material will be covered with an impermeable final surface layer, which will prevent any pathway to human or environmental receptors.

GACs have been issued for a limited number of polynuclear aromatic hydrocarbons (PAH). For residential use without plant uptake, these vary from 1.32 mg/kg to 2,700 mg/kg, depending on toxicity. However the limit value for waste acceptable at landfills for inert waste (under the Landfill Regulations) is 100 mg/kg Total PAH, therefore we have adopted this limit here. We have also derived the screening values for Mineral Oils and PCBs from the Landfill Regulations. The Dutch standard for free cyanide has been used in the absence of a current UK guideline. If the waste fails outside of these threshold values we will undertake a site-specific risk assessment and advice will also be sought from the Environment Agency.

#### 4.3.2 Waste Acceptance Procedures

Please refer to the acceptance flow chart BATPA08/08.

## **5 CONTROL OF EMISSIONS**

### **5.1 Mud and debris**

The deposit of material onto the surfaced road will be treated as an emergency and will be cleared by a vacuum/road sweeper.

A wheel wash is already installed at the site which includes a sealed concrete bath with rumble strips with a dry entry grating and a wet exit grating to allow the shedding of mud/debris carried on the wheels and chassis of vehicles leaving the site. Residual water from the wheel wash and residual mud/debris which is not shed from the vehicle after transmission over the wheel wash will then be contained on the subsequent tarmac apron prior to vehicles accessing the adopted highway.

Visual inspections of the site surface will be undertaken on a daily basis and staff will report any problems with mud on the site surfaces immediately to the site manager. Vehicles will be visually inspected before leaving the site in order to check that loads are safe and that no mud is carried out on the wheels or body of the vehicle.

### **5.2 Dust Control**

A series of dust mitigation measures are already used/implemented on site to ensure dust emissions are controlled as far as is practicably possible. These include the following:

- Sheeting of vehicles delivering waste to site (if necessary);
- Sheeting of vehicles transporting potentially dusty loads off site;
- Use of a mobile bowser on site to damp down vehicle running surfaces;
- Use of a mobile sprinkler;
- Vehicle loads and areas on and around machinery which may give rise to dust, especially during dry and windy conditions;
- Cleaning of any spillages using wet cleaning methods;
- Stockpiles will be limited to 8 metres from the ground;
- Use of crusting agents on stockpiles, if required; and,
- Drop heights always minimised to prevent dust emissions.
- Sprinkler system on the crusher

Site operatives will continuously monitor dust emissions whilst the site is in operation and will report back to the site supervisor for advice if required. The site supervisor will make a formal visual inspection of dust emissions daily and results of monitoring will be entered into the site diary/record forms.

A permanent water supply is available on site in all climatic conditions to ensure that the dust suppression systems can function effectively.

### **5.3 Odour control**

This presents a very low risk of odour nuisance. If malodorous waste is deposited on site it will be consigned to the quarantine skip and removed from site immediately. Any loads which are found to be malodorous will be rejected.

### **5.4 Noise Control**

A noise survey was completed over several days between August 2022 and July 2023 in accordance with BS 7445-1: 2003 by Thomas Benson of Oaktree Environmental Ltd. Attended background level measurements were taken at locations representative of the nearest noise sensitive receptor to the proposed development site.

It is considered the most significant noise sources associated with the development are:

- The loading and operation of the wash plant,
- The unloading/tipping of wastes,
- The loading of HGVs prior to egress,
- The loading and subsequent operation of onsite crushers/screeners,
- The movement/sorting of onsite waste/product via the waste handlers.

A Noise Impact Assessment for the increase in throughput and installation of a wash plant for the waste transfer site at Severn Road, Hallen was conducted, appendix A. The primary receptors are considered to be those located off Severn Road to the southeast of the site.

The site has been assessed with regards to BS4142:2014 and it is considered that the impacts associated with the proposed operation of the site are acceptable based on the comparison of the calculated rating level to the proposed background level.

### **5.5 Pest and Bird Control**

The waste streams will not contain putrescible wastes that would provide a source of food to insects, birds or vermin. No special measures are therefore required to control infestation by pests. This is reviewed if pests are observed at the site in significant numbers.

### **5.6 Litter Control**

The types of waste deposited at the site are to be free of litter. Any loads containing a significant proportion of paper or cardboard will be rejected. Any litter noted will be picked up as soon as possible such that it is collected within 24 hours. Priority will be given to any litter that may have been blown off site. Records will be made of the incident, the location of the litter in relation to the site, the wind direction and the nature of the wastes. Appropriate steps will be taken to remove the source of litter and a record made of the corrective action.

### **5.7 Records**

Bristol and Avon Transport and Recycling Ltd, as the Principal contractor, will be on site during operational hours and the inspection findings will be recorded in the site diary. All details of any breakdowns or complaints will be recorded on the day that each event occurs and will be investigated. Routine inspections will also be carried out to inspect the quality of

the material entering the site, monitor the environmental controls and record the weather conditions.

## **5.8 Surface water control**

During the construction phase no surface water will be permitted a pathway to the water receptor as a holding pond will collect on site water. Earthworks will be covered over in hardstanding as soon as possible following completion.

# **6 RISK ASSESSMENT**

## **6.1 Sources**

The wastes permitted are those listed within Table 1 as set out in the Environmental Permitting (England and Wales) Regulations 2007. The wastes include predominantly inert wastes or those with low polluting potential. The wastes are derived from the construction industry. The wastes will not contain items that represent a source of litter, odour or provide a food source to vermin or insects.

It is however recognised that some of these wastes may give rise to dust when dry and to runoff contaminated with suspended solids when there is significant rainfall. The wastes to be deposited will comprise of soils, clays, stones and rocks from development sites. These wastes are unlike to constitute a source of pollution other than by contaminated run off (see above).

Where it is proposed to use waste materials from sites where there may be potentially contaminative historical uses, these will only be accepted following a desk study and or sampling/ analytical results. Waste materials will be placed at the site using a back acting excavator and a dozer which will generate noise but will be fitted with exhaust silencers.

## **6.2 Pathways**

The predominant pathway for dust and noise is atmospheric. Mud from vehicle wheels can be tracked onto the highway and provide a secondary source of dust. The pathway for suspended solids is surface water runoff. The pathway for contaminants should they be present in the soils will be by leaching in water and dust.

## **6.3 Receptors**

Potential receptors:

- Adjacent dwellings
- Adjacent highways
- Groundwater
- Surface water
- Sensitive conservation sites

Of these the most sensitive human receptors for noise and dust are adjacent properties due to the proximity.

The site is not located within an Inner Source Protection Zone as defined by the Environment Agency Policy for the Protection of Groundwater. There is a watercourse near to the site.

#### **6.4 Magnitude of Risk (Source: Environment Agency)**

Magnitude of the risk is determined by combining the probability with the magnitude of the potential consequences, categorised as high, medium, low or very low.

Please see attached Risk Assessment.

### Pollution Risk Assessment

Receptor	Source	Harm	Pathway	Probability of Exposure	Consequence	Magnitude of risk	Justification for magnitude	Risk Management	Residual Risk
Human	Imported material	Human Health	Direct ingestion	Very low	Medium	Low	No plant uptake or vegetables to be grown.	All imported material will require analysis which will be assessed against the CLEA model, and SGV's.  There is no residential use or plant or vegetable uptake which could increase risk to human health.	Low
			Inhalation of soil	Low during material movement.	Medium	Medium	All operatives to wear correct PPE. In periods of dry weather dust to be suppressed using bouser.		Low
				Very low during completion	Medium	Low	Final finished surfaces will be impermeable so material will not be in contact with humans		Very Low
	Noise	Noise nuisance & amenity value	Atmospheric	Low	Low	Low	Currently located within an industrial estate. Additional traffic movements are not believed to cause significant noise problem. All machinery fitted with silencers.	Vehicle movement only permitted within operational hours. Fitted with silencers. Serviced & maintained regularly.	Low
	Odour	Odour nuisance & amenity value	Atmospheric	Low	Low	Low	No malodorous wastes accepted	Quarantine and reject malodorous loads	Low
	Litter	Amenity value	Windblown	Low	Low	Low	Permitted wastes unlikely to generate litter	Quarantine and reject loads containing litter	Low
	Pests	Human health & amenity value	Direct	Low	Low	Low	Permitted wastes unlikely to attract pests.	No putrescible material accepted on site	Low
Water	Imported material	Water Quality via direct runoff or leaching of contaminants	Run off	Very Low	Low	Low	No pathway for runoff to watercourse.  Material covered with impermeable surface following works.	Ensure earthworks are covered with hard standing on completion of works. Holding pond to collect runoff during construction.	Low
			Leaching	Low	Medium	Medium	All material required to meet acceptance criteria outlined in the Environmental risk assessment.	Ensure all waste meets criteria and approval sought from EA.	Low

Receptor	Source	Harm	Pathway	Probability of Exposure	Consequence	Magnitude of risk	Justification for magnitude	Risk Management	Residual Risk
							Material covered with impermeable hard standing.		
			Groundwater	Medium	High	High	All oil storage to be stored in bunded tank with 110% bund. Only re-fuelling in designated areas. Spill kits provided onsite.  Only permitted waste to be received. No hazardous wastes	All plant and machinery well maintained.  Site surfacing inspected regularly.	Medium
<b>Air</b>	Imported material	Dust nuisance	Atmospheric & trafficking of vehicles	Low	Medium	Medium	All operatives to wear correct PPE. In periods of dry weather dust to be suppressed using a bouser. Vehicles will be sheeted and access roads sprayed to reduce dust.	Contractor to carry out site inspections and inductions for all operatives.	Low
<b>Land</b>	Imported material	Currently vacant industrial land.	No pathway to SSSI.  Direct - Material deposited will be assessed using CLEA for commercial use.	Low	Medium	Medium	No direct pathway to SSSI. Imported material is assessed using guidance criteria.	Ensure all waste meets criteria and approval sought from EA.	Low
<b>Plant/ Animal</b>	Imported material	Not within 1km of SSSI	No known pathway to SSSI.	Low	Medium	Medium	No planting or vegetation uptake.  Land covered with impermeable hard standing.	Ensure all waste meets criteria and approval sought from EA.	Low
		Nature Conservation Sites, protected habitats	No pathway to receptor	Low	Medium	Medium	Low impact activity on habitats. No pathway to receptor. All operations restricted to within site boundary.	Holding pond constructed to prevent surface water runoff into water course.	Low