CRIBBS CAUSEWAY AEROBIC DIGESTER

Environmental Permit Application

Environmental Risk Assessment

Prepared for: Advetec Limited

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1.0 INTRODUCTION

SLR Consulting Limited (SLR) has been instructed by Advetec Limited (Advetec) to prepare a new bespoke Environmental Permit (EP) application for the proposed Cribbs Causeway Aerobic Digester (AD). The application involves an aerobic digestion system, operated by Incentive Facilities Management Limited (Incentive FM) which is located underneath Cribbs Causeway Shopping Centre, Patchway, Bristol, BS34 5DG, hereafter referred to as 'the site'.

This Environmental Risk Assessment (ERA) has been undertaken in accordance with the Environment Agency's (EA) guidance 'Risk assessments for your environmental permit' (March 2021).

It is a simple assessment of the risks to the environment and human health from accidents, noise and fugitive emissions that may be associated with the proposed variation of operations at the site. The aim of the assessment is to identify any significant risks and demonstrate that the risk of pollution or harm will be acceptable by implementing appropriate measures to manage these risks.

The risk assessments for your EP guidance requires that all receptors that are near to the site and could reasonably be affected by the activities are identified and considered as part of the ERA. Therefore, for the purpose of this report:

- A 2km radius has been adopted in reviewing potentially sensitive receptors of cultural and ecological importance; and
- A radius of 500m from the proposed permit boundary has been adopted for all other potentially sensitive receptors (for example, residential, commercial, industrial, agricultural and surface water receptors).

1.1 Overview and Approach

The assessment is based on the risk assessment for a bespoke EP.

This section outlines the procedure that has been followed in the undertaking of the ERA for the site:

Step One	Identify risks and their sources for the site
Step Two	Identify receptors at risk from the site
Step Three	Identify pathways between sources and receptors
Step Four	Assess risks relevant to the site activities and determine if they can be screened out
Step Five	State measures proposed to control unacceptably high risks
Step Six	Present your assessment

Step One is a screening step to identify the potential risks to the environment from the proposed development. The EA Guidance identifies areas that the EA considers would likely require assessment for most sites as follows:

- Odour;
- Noise & Vibrations;
- Visible Emissions;
- Discharges such as to surface or groundwater;
- Release of bioaerosols;
- Fugitive Emissions (including dust, mud, litter and pests); and
- Accidents.

2.0 SITE SETTING

Step Two identifies people or parts of the environment that could be harmed (at potentially significant risk) by the activity. This section details the site setting and potentially sensitive receptors near the site.

2.1 Site Setting

The site is located beneath the Cribbs Causeway Shopping Centre, Patchway, Bristol, BS34 5DG, centred on National Grid Reference (NGR) ST 58779 80826. The aerobic digestor is located within a waste compound, underneath the shopping centre, near to the main entrance. The Site is accessed via the South Loading Bays entrance, approximately beneath the John Lewis store at (NGR) ST 58565 80964 via an unnamed access road, which leads south off Centaurus Road. The site location is illustrated on Drawing EP1.

The site is immediately surrounded in all directions by commercial and industrial units comprising the Cribbs Causeway shopping centre complex and additional surrounding commercial and industrial units. The town of Patchway is located approximately 1km to the east of the site, comprising large areas of residential properties. Bristol City Centre is located 7.8km south, and the Bristol Channel is located approximately 6km to the west.

A summary of the immediate surrounding land use is provided in Table 1.

Table 1 Surrounding Land Use

Direction	Land Use
North	Industrial and commercial land, including the bus station and Patchway trading estate. The M5 motorway is situated approximately 565m to the North of the site at the closest point. Beyond this lies area of open rural land interspersed with some residential dwellings and Bristol Golf Course.
East	The town of Patchway is located approximately 1km to the East, which comprises largely of residential properties.
South	Merlin road, which is an access road to Cribbs Causeway shopping centre is located to the south of the site. Beyond this is Filton Airfield, which is disused and has been partially redeveloped for residential properties.
West	Industrial and commercial properties, beyond that is the A4018 and the M5 motorway. Areas of open rural land surround the M5 towards the West.

2.1.1 Agricultural

As the site is situated within a predominantly industrialised area, there is limited agricultural land in the surrounding area.

2.1.2 Commercial and Industrial

The site is located within a waste compound underneath Cribbs Causeway Shopping Centre, approximately situated beneath the River Island store, near the main entrance. Therefore, there are numerous commercial and industrial receptors surrounding the site.

2.1.3 Local Transport Network

There are numerous roads within a 500m radius of the site. The site is accessed via an unnamed access road, which leads south off Centaurus Road.

The M5 motorway is situated approximately 700m to the north of the site at the closest point.

2.1.4 Open Land and Woodland

There is currently one area of open land situated within a 500m radius of the site. Woodland is present within 2km of the site but not within 500m. Please see section 2.3 regarding woodland designated habitats for further information.

The nearest plot of woodland is situated approximately 280m to the North of the site. The closest plot of open land lies 260m to the south of the site, which is part of Filton airfield and is now disused.

2.1.5 Residential

As the area is predominantly used for commercial uses, there are only a couple of residential properties located within a 500m radius of the Site. Beyond this, residential areas are located to the east, south and west of the site. The nearest residential properties are located approximately 375m to the east of the site, in a residential area called Highwood Park.

2.2 Geology, Hydrogeology and Hydrology

2.2.1 Geology

A review of the British Geological Survey (BGS)[1] mapping reveals that the site is underlain by a bedrock of Mudstone and Limestone which is interbedded from the Cotham Member and Westbury formation. There are no recorded superficial deposits.

2.2.2 Hydrogeology

The mudstone bedrock underlying the site is identified as a Secondary B aquifer on the Multi-Agency Geographical Information for the Countryside (MAGIC) map[2]. This is defined as 'predominantly lower permeability strata which may in part have the ability to store and yield limited amounts of groundwater by virtue of localised features such as fissures, thin permeable horizons and weathering'.

Superficial drift is recorded as unproductive.

Groundwater Vulnerability

MAGIC map shows that the site lies in an area of high groundwater vulnerability with soluble rock risk.

Source Protection Zones

The site is not located within a source protection zone for drinking water.

2.2.3 Hydrology

The Flood Map for Planning[3] identifies the site as lying within a Flood Zone 1, defined as "Land having a less than 1 in 1,000 annual probability of river or sea flooding".

The nearest surface water receptor to the site is a drain is situated 200m to the north-east of the site. A larger pond which is attached to a drain is located approximately 310m to the south-west of the site.

[1] British Geological Survey (BGS) Available at www.bgs.ac.uk, accessed in March 2021

[2] Multi-Agency Geographical Information for the Countryside Map, available at www.magic.gov.uk, accessed in March 2021

[3] Gov.uk Flood Map for Planning, available at https://flood-map-for-planning.service.gov.uk/, accessed in March 2021

2.3 Designated Habitat Sites

A 2km radius was used for identifying nearby designated habitat sites. A review of MAGIC confirmed none of the following receptors are present in a 2km radius of the site:

- National Parks;
- National Nature Reserve;
- Ramsar;
- Special Area of Conservation;
- Special Protection Area;
- Area of Outstanding Natural Beauty; and
- Marine Conservation Zone.

2.3.1 Site of Special Scientific Interest (SSSI)

Pen Park Hole is a Site of Special Scientific Interest (SSSI) situated approximately 1.6km to the south of the site. This is the only SSSI located within a 2km radius of the site.

2.3.2 Local Nature Reserve (LNR)

Gorse Covert, Local Nature Reserve (LNR) is located approximately 800m to the north-east of the site.

2.3.3 Ancient woodland

There are two areas of ancient woodland located within a 2km radius of the site. Blackhorse wood is located approximately 1.4km to the west of the site. Another area of ancient and semi-natural woodland which is unnamed is located 1.4km to the north of the site.

2.4 Cultural Heritage

A review of MAGIC identified multiple Grade II and Grade III listed buildings within 2km of the site to the north, east, south, and west. The nearest listed building is Cedar House, a Grade II listed building, situated approximately 840m to the south of the site.

The review of MAGIC confirmed that there are none of the following receptors within a 2km radius of the site:

- Scheduled Monuments;
- World Heritage Sites;
- Registered Battlefields; and
- Registered Park and Garden.

2.5 Receptors

Local receptors within 500m of the site are recorded in Table 2, along with natural and cultural receptors within 2km. SSSIs are recorded within 2km, in accordance with the Draft EA guidance[4].

[4] EA Draft guidance 'How to complete a location check in Opra' 2011

Table 2 Receptors

Receptor Name	Receptor Type	Direction	Approximate Distance from Permit Boundary (m)
Local Receptors within 500m			
Cribbs Causeway Shopping Centre	Commercial	Adjacent	N/A
Bus Station	Commercial	North East	180m
Merlin Road	Road	South	300m
Filton Airfield (disused)	Open land	South	260m
Drain	Surface water feature	North	200m
Drain	Surface water feature	South west	310m
Centaurus Road	Road	North west	320m
Residential Properties-Highwood Park	Residential	East	375m
Centaurus Retail Park	Commercial	North	400m
The Venue	Commercial/ Recreational	South east	400m
Ecological and Cultural Receptors within 2km			
Cedar House	Grade II listed building	South	740m
Gorse Covert	Local Nature Reserve (LNR)	North east	800m
Blackhorse Wood	Ancient Woodland	North west	1.4km
Woodland (unnamed)	Ancient and semi-natural woodland	North	1.4km
Pen Park Hole	Site of Special Scientific Interest (SSSI)	South	1.6km

2.6 Wind Rose

The wind direction and frequency should be considered when looking at the impact of emissions on receptors. The predominant wind direction is from the west and south west, with winds from the east and north relatively infrequent.

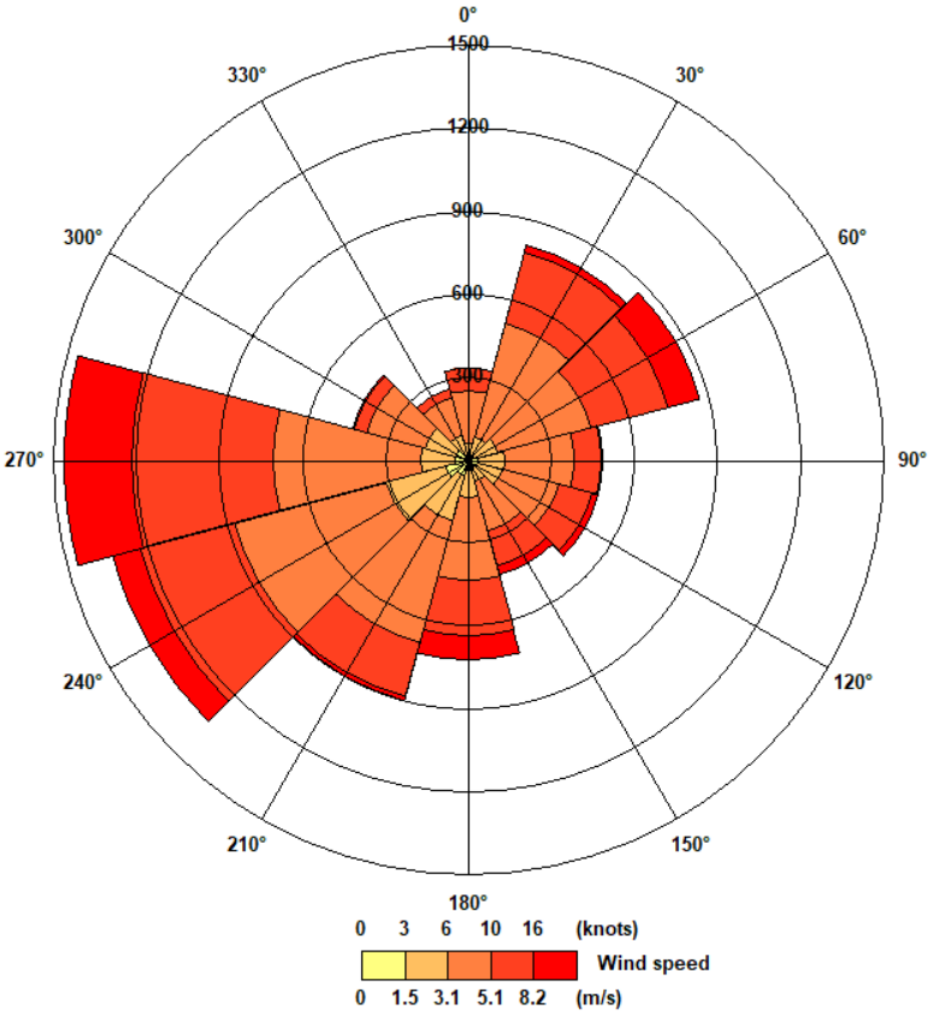

Figure 1 Wind Rose from Bristol Meteorological Station (2016)

3.0 ENVIRONMENTAL RISK ASSESSMENT

Step Three identifies the potential pathways between source and receptor and where appropriate, the assessment demonstrates how the risk of pollution or harm can be mitigated by measures to manage these risks and/or block the pathways (Steps Four and Five). The following tables in accordance with EA guidance[5] present the assessment in terms of hazards posed, receptors and pathways, along with management and residual risks for the following hazards:

- Odour;
- Noise & Vibrations;
- Visible Emissions;
- Bioaerosols;
- Discharge to surface or groundwater;
- Fugitive Emissions (including dust, mud, litter and pests); and
- Accidents.

[5] EA Guidance Risk Assessments for your environmental permit March 2021

Table 3 Odour Risk Assessment and Management Plan

What do you do that can harm and what could be harmed			Managing the Risk	Assessing the Risk		
Hazard	**Receptor**	**Pathway**	**Risk Management**	**Probability of Exposure**	**Consequences**	**What is the overall risk**
What has the potential to cause harm?	What is at risk/What do I wish to protect?	How can the hazard get to the receptor?	What measures will you take to reduce the risk? Who is responsible for what?	How likely is the contact?	What is the harm that can be caused?	What is the risk that still remains? The balance of probability and consequence
Odour from the acceptance and treatment of waste through the aerobic digester. Odour from waste storage in the compound.	Sensitive receptors listed in Table 2 including residential, commercial, agricultural recreational and ecological receptors.	Air	Due to the small scale of the aerobic digester (less than 2 tonnes per day), the risk of odour is low. The site is also located underground, which prevents odour from affecting sensitive receptors within a close proximity of the site. The waste types accepted on site have low odour potential. Waste comes from a single source generated on the site of the shopping centre. Therefore, waste is received prior to undergoing degradation and putrefaction. The digestion process is undertaken aerobically which limits odour generation compared to an anaerobic digestion process for example. The automatically controlled process ensures that anaerobic conditions will not develop within the vessel. The aerobic digester is a sealed process benefitting from a carbon filter, which abates any odours which may be produced during the process. The compactor in which the post-process flock is stored, is an enclosed bin, also stored underground away from receptors meaning that odour potential from storage of waste is low. The compactor is also collected and emptied a minimum of once a week and more often if so required, meaning the waste has little time for any potential odour to be generated. Storage areas and the perimeter of the site is monitored daily for any unacceptable levels of odour. Any odour identified on site is recorded in the site diary, investigated by the site manager and remediated as soon as possible. Storage of waste generated by the machine is stored within a lidded 1,100 litre wheelie bin prior to collection and transportation off-site. Storage prior to treatment is a non-Waste Framework Directive activity due to having been generated on the site of the waste producer. The Site Manager is responsible for managing emissions of odour on site.	Low	Odour Nuisance and loss of amenity.	Very Low

Table 4 Noise Risk Assessment and Management Plan

What do you do that can harm and what could be harmed			Managing the Risk	Assessing the Risk		
Hazard	Receptor	Pathway	Risk Management	Probability of Exposure	Consequences	What is the overall risk
What has the potential to cause harm?	What is at risk/What do I wish to protect?	How can the hazard get to the receptor?	What measures will you take to reduce the risk? Who is responsible for what?	How likely is the contact?	What is the harm that can be caused?	What is the risk that still remains? The balance of probability and consequence
Noise from the aerobic digester.	Sensitive receptors listed in Table 2 including residential, commercial, agricultural recreational and ecological receptors.	Air	It is considered unlikely that significant noise or vibrations will be generated by the aerobic digester. The scale and location of the aerobic digester will also prevent noise pollution as it is situated underground and treats approximately 2 tonnes of waste per day within a sealed vessel. Noise pollution will be reduced compared to without the digester, as transport required to transfer the waste generated on site will be less frequent. To ensure that noise and vibrations are limited, the following management techniques will be implemented: • All plant and machinery will be operated and maintained in accordance with manufacturer's specifications; • Machinery will be operated so as to minimise noise; • Vehicles adhere to a speed limit on site, and within the wider Cribbs Causeway Shopping Centre; and • Site surfaces will be kept in good repair to minimise noise associated with uneven roads Daily auditory monitoring will be carried out by site personnel to identify any unacceptable levels of noise. A record of the inspection findings will be made in the site diary. Remedial action will be taken in the event that noise from the site is detected at nearby sensitive receptor locations. The Site Manager will be responsible for managing emissions of noise on site.	Low	Noise disturbance and loss of amenity.	Low

Table 5 Fugitive Emissions Risk Assessment and Management Plan

What do you do that can harm and what could be harmed			Managing the Risk	Assessing the Risk		
Hazard	Receptor	Pathway	Risk Management	Probability of Exposure	Consequences	What is the overall risk
What has the potential to cause harm?	What is at risk/What do I wish to protect?	How can the hazard get to the receptor?	What measures will you take to reduce the risk? Who is responsible for what?	How likely is the contact?	What is the harm that can be caused?	What is the risk that still remains? The balance of probability and consequence
To Air:						
Dust from vehicle movements transferring residual waste off the site.	Sensitive receptors listed in Table 2 including residential, commercial, agricultural recreational and ecological receptors.	Air	The digester is located within a compound with concrete surfacing leading to tarmacked roadways. As such, vehicles will not be tracking over dusty roads. Use of the digester will result in a reduction in vehicle movements thereby reducing the potential for dust generation from this source. Daily visual inspections will be conducted in response to any complaints. If dust is deemed a nuisance from any of these inspections, mitigation measures will be enforced to reduce any dust emissions. The result of any inspections or investigations as a result of complaints will be recorded in the Site Diary. The Site Manager will be responsible for implementing risk management measures in accordance with operational and management procedures including the Site's Dust Management Plan.	Negligible.	Nuisance and harm to human health	Low
Dust from storage and transfer of waste from bins to the aerobic digestor.	Sensitive receptors listed in Table 2 including residential, commercial, agricultural recreational and ecological receptors.	Air	Waste is bagged and stored in lidded wheelie bins. The lidded wheelie bins are loaded in to a hopper within a shrouded bin loader. The aerobic digester accepts approximately 2 tonnes of waste each day. It is therefore a small scale activity. Daily visual inspections will be conducted in response to any complaints. If dust is deemed a nuisance from any of these inspections, mitigation measures will be enforced to reduce any dust emissions. The result of any inspections or investigations as a result of complaints will be recorded in the Site Diary. The Site Manager will be responsible for implementing risk management measures in accordance with operational and management procedures.	Low	Nuisance and harm to human health.	Low
Bioaerosols released during aerobic digestion.	Sensitive receptors listed in Table 2 including residential, commercial, agricultural recreational and ecological receptors.	Air	It is considered unlikely that the aerobic digester will emit significant levels of bioaerosols due to the small scale of the machine which only treats up to 2 tonnes of waste per day. The site is located within an underground compound which also decreases the risk of the aerobic digester harming sensitive receptors with bioaerosols. The digestion process is undertaken within a sealed vessel, benefiting from a carbon filter. This limits the release of bioaerosols from the treatment process.	Low	Nuisance and harm to human health	Low

			Daily visual inspections shall be undertaken at all areas of the site to check for conditions potentially affecting bioaerosol release. Records of the findings will be recorded in the sit diary. Operational areas and site surfaces shall be maintained in a clean condition; and processes shall take place in designated and controlled areas of the site. A bioaerosols monitoring report has been completed and include within Section 7 of this EP application. The report concludes that Total Viable Count (TVC) and Aspergillus Fumigatus did not exceed the Internal Control Levels or the relevant ambient air bioaerosol concentration limits at any of the monitored locations.			
To Water:						
Contaminated run off from aerobic digester.	Sensitive receptors listed in Table 2 including residential, commercial, agricultural recreational and ecological receptors. Groundwater.	Land	Waste is stored in wheelie bins or within the digester while undergoing treatment. No waste is stored on the ground. Waste comes from a single source generated on the site of the shopping centre. Therefore, waste is received prior to undergoing degradation and putrefaction. All wastes received at the site are solid. No liquid wastes are accepted. The treatment process is exothermic. The heating of the waste during the treatment process causes it to dry out with the moisture extracted and treated via the carbon filter. Due to the site being located within an underground compound, the risk of contaminated run off is low. No rain falls on the site or through the compound. Waste received at the site is low risk non-hazardous in nature. The aerobic digestion process does not use water and does not discharge to a drain or sewer, which makes it a low potential risk. The Site Manager will be responsible for implementing risk management measures in accordance with operational and management procedures.	Low	Contamination	Very Low
Pests						
Birds, pests and insects attracted to waste stored around the compound and the residual flock produced from the aerobic digester.	Sensitive receptors listed in Table 2 including residential, commercial, agricultural recreational and ecological receptors.	Land, Water and Air	Due to the site being located within an underground compound, it is unlikely that birds will be present, however there is low risk of other pests such as insects and vermin such as rats. Waste is stored in wheelie bins or within the digester while undergoing treatment. No waste is stored on the ground. It is considered unlikely that the waste types accepted on site will generate significant levels of scavenging animals. Site personnel will conduct daily inspections of waste storage areas for signs of scavenging animals. If scavenging animals are spotted a licenced contractor is contacted to remove them and the offending waste type will be investigated and removed if necessary. The Site Manager is responsible for management of scavenging animals.	Low	Nuisance, potential risk to health	Very Low
Mud/Litter						
Litter from waste	Sensitive receptors listed in Table 2 including residential, commercial,	Air	Due to the scale of the aerobic digestor, which only processes up to 2 tonnes of waste per day, the potential risk of litter is low.	Low	Nuisance from litter. Dangerous conditions on roads.	Very Low

	agricultural recreational and ecological receptors.		Waste is bagged and stored in lidded wheelie bins. The lidded wheelie bins are loaded in to a hopper within a shrouded bin loader. Waste output from the digester is loaded directly on a conveyor into a 1,100 litre wheelie bin. The site is located underground and there is no wind that might blow litter during loading or unloading of the unit. The site will be inspected daily for signs of litter. The site benefits from good housekeeping. In the event that any litter is identified on site, it is cleared from the affected area. The Site Manager is responsible for managing emissions of litter on and off site.			
Mud from vehicle movements	Local Road Network	Transferral of mud on vehicles wheels	Due to the site being located within an underground compound, underneath Cribbs Causeway shopping centre, there is a low potential risk for mud on roads on and off site. The access roads to the site are all tarmacked and therefore present low risk in terms of transferring mud. The permitted waste types have low litter potential, therefore vehicles which transfer the residual waste off site have a low potential to track mud and waste on and off site. All site vehicles will be checked to ensure that they are clear of loose waste prior to leaving the site. Due to the small scale of residual waste produced from the aerobic digester, transport of the waste off site will be infrequent and therefore reduce the risk of mud being transferred. Good housekeeping will be put in place by the site manager, which involves daily cleaning and inspections. The site will be inspected daily for signs of litter, mud or waste. Any identified instances of mud, litter or waste are cleared immediately. The Site Manager is responsible for managing emissions of litter and mud on site.	Low	Nuisance from mud. Dangerous conditions on roads.	Low

Table 6 Accidents Risk Assessment and Management Plan

What do you do that can harm and what could be harmed			Managing the Risk	Assessing the Risk		
Hazard	Receptor	Pathway	Risk Management	Probability of Exposure	Consequences	What is the overall risk
What has the potential to cause harm?	What is at risk/What do I wish to protect?	How can the hazard get to the receptor?	What measures will you take to reduce the risk? Who is responsible for what?	How likely is the contact?	What is the harm that can be caused?	What is the risk that still remains? The balance of probability and consequence
Leakage of fuel and oils	Local surface water features including rivers, streams and drains. Groundwater.	Land	There are no fuels stored on site, however there is the potential for fuel spillage from the vehicles transferring residual waste from the site. The site will be monitored for any spillages associated with vehicle removals and any identified incidents are cleaned up as soon as they are identified. The result of any inspections or investigations as a result of complaints will be recorded in the Site Diary. The Site Manager will be responsible for implementing risk management measures in accordance with appropriate procedures outlined in the Operating Techniques.	Low	Contamination of surroundings	Very Low
Fire	Sensitive receptors listed in Table 2 including residential, commercial, recreational, ecological and agricultural receptors. Site personnel.	Air and Land	Storage of waste generated by the machine is stored within a lidded 1,100 litre wheelie bin prior to collection and transportation off-site. Storage prior to treatment is a non-Waste Framework Directive activity due to having been generated on the site of the waste producer. In any event, waste is stored is small volumes within bins. There are no other combustible materials stored on site, so a low magnitude risk is estimated. Permitted activities do not include the burning of waste. Smoke detectors and sprinklers are located throughout the site to detect fire, as well as fire extinguishers situated around the compound. It is also a requirement for all employees with access to the site to be trained as fire marshals. An internal temperature monitor is situated within the compound which continually assesses the temperature of the aerobic digester. The temperature measurements can be accessed via cloud-based portal. The system is programmed with alerts and alarms to notify the user of any temperature related risks. In the event of events such as arson and vandalism the incident is recorded in the site log and reported to the relevant authority. Site security measures are reviewed and improved where necessary. The Cribbs Causeway Shopping Centre benefits from security guards, restricted access areas and CCTV.	Low	Harm to human health, harm to operations, pollution of surroundings.	Low
Flooding	Sensitive receptors listed in Table 2 including residential, commercial, agricultural recreational and ecological receptors. Site personnel.	Land	The site lies in a Flood Zone 1, which is classified as “Land having a less than 1 in 1,000 annual probability of river or sea flooding”. The Site Manager is responsible for the management of the site in the event of flooding.	Low	Harm to human health, contamination of groundwater and surface water.	Very low

Security and Vandalism	Sensitive receptors listed in Table 2 including residential, commercial, agricultural recreational and ecological receptors.	Air, Land and Water	To prevent unauthorised access, the site has a lockable site entrance and benefits from being located within an underground compound beneath Cribbs Causeway Shopping Centre. The location of the site should minimise unauthorised access. Access to the Site also requires passing through the South Loading Bays entrance which has a barrier and floor blockade to prevent vehicles entering the Site without permitted access. In the event that damage is sustained repairs are made by the end of the working day. If this is not possible, suitable measures will be taken to prevent any unauthorised access to the site and permanent repairs are affected as soon as practicable. The Site Manager will be responsible for managing security on site. This includes inspecting the site at the commencement of each day. All inspections, any defects, damage or repairs is recorded in the Site diary.	Low	Nuisance, Contamination and harm to human health.	Low

4.0 CONCLUSION

To conclude, this ERA has been undertaken in accordance with EA guidance. The assessment is provided as part of the application for a bespoke EP application for Cribbs Causeway Aerobic Digester.

The qualitative risk assessment has considered that the proposed environmental permit for the site will not pose a significant risk of harm to sensitive receptors in the vicinity of the site predominantly due to both the small scale of the aerobic digestion activity and the location of the site within an underground compound.

The assessment concludes that with the implementation of the risk management measures described above, potential hazards from the proposed development are not likely to be significant and no further assessment is required.

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