Widdington Recycling Ltd

Haverhill Waste Management Site
Land West of Falconer Road
Haverhill
CB9 8QE

Bespoke Permit Application (variation from Standard Permit reference EPR/WE8118AB)

Environmental Risk Assessment – Adjacent Local Wildlife Site

September 2025

1. Introduction

Widdington Recycling Ltd operates a non-hazardous waste transfer station at Falconer Road, Haverhill. The facility has operated under a Standard Rules Permit (EPR/WE8118AB) but now requires a bespoke permit owing to the proximity of a Local Wildlife Site (LWS) within 50 metres of the site boundary. Operations and throughput remain unchanged from the previous authorisation.

This Environmental Risk Assessment focuses specifically on the potential impact of the facility on the Haverhill Railway Walks Local Wildlife Site (LWS), as requested by the Environment Agency in their email correspondence dated 19 September, 2025, which stated:

Please provide a risk assessment in accordance with our guidance Risk assessments for your environmental permit - GOV.UK. As the facility will continue to operate with the same level of environmental risk as the standard rules, we are only asking for your assessment to consider the adjacent Local Wildlife Site.

2. Location and Description of the Local Wildlife Site

The LWS lies immediately west of the waste transfer station, occupying a former railway line with elevated ground (approximately five metres higher than the waste site platform). It supports mature woodland, scrub, and tree cover, providing important habitat for nesting and foraging birds, roosting and commuting bats, and a diverse flora and invertebrate assemblage.

The location and extent of the LWS is shown on the map presented in Appendix 1, Local Wildlife Sites provided by the EA in their response to the pre-application request relating to the EP variation application.

The difference in ground levels means there is no hydrological pathway from the site to the LWS. Site drainage is fully sealed and directed to internal management systems. A 2.5 metre screening bund and four-metre-high concrete retaining walls enclose the western boundary, supplemented by a tree belt, ensuring a robust buffer between operational activities and the ecological receptor.

3. Potential Sensitivities of the LWS

The sensitivities of the LWS relate to birds, bats, and flora. Birds are potentially sensitive to disturbance from noise and lighting, especially during the breeding season. Bats may be disturbed by inappropriate lighting that could interfere with foraging and commuting routes. Flora and invertebrates could theoretically be affected by dust deposition from operations on the adjacent site.

4. Assessment of Potential Impacts

4.1 Dust

The waste transfer station involves sorting, screening, and crushing of construction and demolition wastes, all of which can generate dust. The Air Quality Assessment prepared for planning (Air Quality Consultants, 2024) concluded that dust impacts at ecological receptors, including the LWS, are negligible under IAQM guidance. The risk is further mitigated by dust suppression systems, paved hardstanding, and containment within concrete bays. Given the controls and distance, the residual risk of dust deposition affecting the LWS flora is negligible.

4.2 Noise

Noise emissions arise from vehicle movements, material handling, and use of crushing and screening plant. A Noise Assessment undertaken by Vibrock Ltd (December 2023) modelled operational noise levels against BS 4142 and concluded that impacts at the nearest receptors are low or negligible, with rating levels at or below background sound levels.

In relation to the LWS, the topographic rise and intervening bund/wall provide additional attenuation. Birds may experience occasional disturbance from site activity, but noise is confined to daytime hours (06:00–18:00 weekdays, 06:00–14:00 Saturdays) with no evening, night-time, or Sunday operations. Bats are unlikely to be affected given the absence of nocturnal activity. The residual risk to LWS fauna from noise is therefore negligible.

4.3 Light Pollution

Artificial lighting is used for operational and safety purposes. A Lighting Assessment prepared by Strenger Ltd (May 2024) modelled the lighting scheme and confirmed compliance with ILP GN01/21 limits for Environmental Zone E3. Predicted vertical illuminance at off-site receptors is ≤0.04 lux (well below the 2 lux post-curfew criterion), glare is within the 1,000 cd limit, and upward light ratio is 0% (against a 5% limit).

Given the controlled design, downward-directed luminaires, and absence of overnight operations, the risk of lighting impacts on bat commuting or foraging and bird activity is negligible.

4.4 Surface Water Run-off and Contamination

The LWS sits approximately five metres higher than the site platform. All operational areas are laid to impermeable concrete with sealed drainage systems, tied into the retaining walls. There is no mechanism by which contaminants or suspended solids could migrate into the LWS. The risk of run-off impact is nil.

5. Residual Risk Evaluation

Considering dust, noise, lighting, and water pathways, the potential effects on the LWS are fully mitigated and residual risks are negligible. The operations will not adversely affect the ecological integrity or function of the LWS.

6. EA Standard Risk and Mitigation Tables

Table 1: Dust

What you do that can harm and what could be harmed		Managing the Risk		Assessing the Risk		
Hazard	Receptor	Pathway	Risk management	Probability of exposure	Consequence	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 this contact?	What is the harm that can be caused?	What is the risk that still remains? The balance of the probability and consequence
Dust from crushing, screening, vehicle movements	LWS flora and invertebrates	Airborne transport and deposition on vegetation	Measures: Operate and maintain misting and mobile bowser; keep paved surfaces damp/clean; enforce 10 mph speed limit; sheet all outbound loads; use 4 m bay walls and perimeter retaining wall; conduct boundary visual dust checks (increased during dry/windy conditions); stop/modify activities if visible dust leaves	Unlikely	Minor – possible smothering of vegetation or reduced photosynthesis	Negligible

			boundary; record and investigate complaints. Responsibilities: Site Manager – activate/adjust dust suppression, maintain equipment, enforce speed/housekeeping, investigate complaints, stop-work authority; All site operatives – continuous visual dust surveillance and prompt reporting (training provided).			

Table 2: Noise

What you do that can harm and what could be harmed		Managing the Risk		Assessing the Risk		
Hazard	Receptor	Pathway	Risk management	Probability of exposure	Consequence	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 this contact?	What is the harm that can be caused?	What is the risk that still remains? The balance of the probability and consequence

Noise from HGVs, plant, and crushing activities	Birds and bats in LWS	Airborne transmission of noise	Measures: Restrict noisy operations to 07:00–18:00 Mon–Fri and 07:00–14:00 Sat; no Sundays/Bank Holidays; maintain plant silencers and service schedules; minimise drop heights/idling; use bunds/walls for screening; locate/orient plant away from LWS where practicable; log and investigate complaints; undertake periodic boundary checks. Responsibilities: Site Manager – enforce hours, schedule/verify maintenance, review plant locations, monitor/record noise issues and complaints; All site operatives – follow quiet working practices (low drop heights, no unnecessary revving).	Unlikely	Minor disturbance to nesting or foraging behaviour	Negligible

Table 3: Light

What you do that can harm and what could be harmed		Managing the Risk		Assessing the Risk		
Hazard	Receptor	Pathway	Risk management	Probability of exposure	Consequence	What is the overall risk
What has the potential to cause harm?	What is at risk – what do I	How can the hazard get	What measures will you take to reduce the risk? Who is responsible for what?	How likely is this contact?	What is the harm that can be caused?	What is the risk that still remains?

	wish to protect?	to the receptor?				The balance of the probability and consequence
External site lighting	Birds and bats in LWS	Light spill, glare, or sky-glow entering LWS	Measures: Use downward-facing, shielded LED luminaires; maintain aiming/height per the approved lighting design; no overnight lighting – switch off when not required; minimise glare/sky-glow; repair lighting faults promptly; periodic night-time checks to confirm no light spill towards LWS beyond design assumptions. Responsibilities: Site Manager – ensure compliance with lighting scheme, arrange periodic checks and maintenance; All site operatives – report any mis-aimed/damaged luminaires or unintended lighting use (training provided).	Unlikely	Behavioural disruption to birds or bats if unmanaged	Negligible

Table 4: Run-off and Contamination

What you do that can harm and what could be harmed	Managing the Risk	Assessing the Risk

Hazard	Receptor	Pathway	Risk management	Probability of exposure	Consequence	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 this contact?	What is the harm that can be caused?	What is the risk that still remains? The balance of the probability and consequence
Surface water or leachate from waste handling	LWS soils and flora	Surface water run-off	Measures: Maintain impermeable concrete apron and sealed drainage; inspect perimeter retaining wall/apron integrity; implement spill prevention and response (spill kits available); prohibit discharge off-site; routine inspections recorded. Responsibilities: Site Manager – maintenance of drainage/apron, spill response leadership and record-keeping; All site operatives – immediate reporting/containment of spills or surface damage (training provided).	None	None	None

7. Conclusion

This ERA has been undertaken in accordance with EA guidance. The assessment is provided as part of the EP variation application for Haverhill WTS.

The Haverhill Waste Transfer Station will continue to operate with the same level of environmental protection as under the Standard Rules permit. With mitigation in place and confirmed by technical assessments, the risk to the adjacent Haverhill Railway Walks LWS is **negligible**.

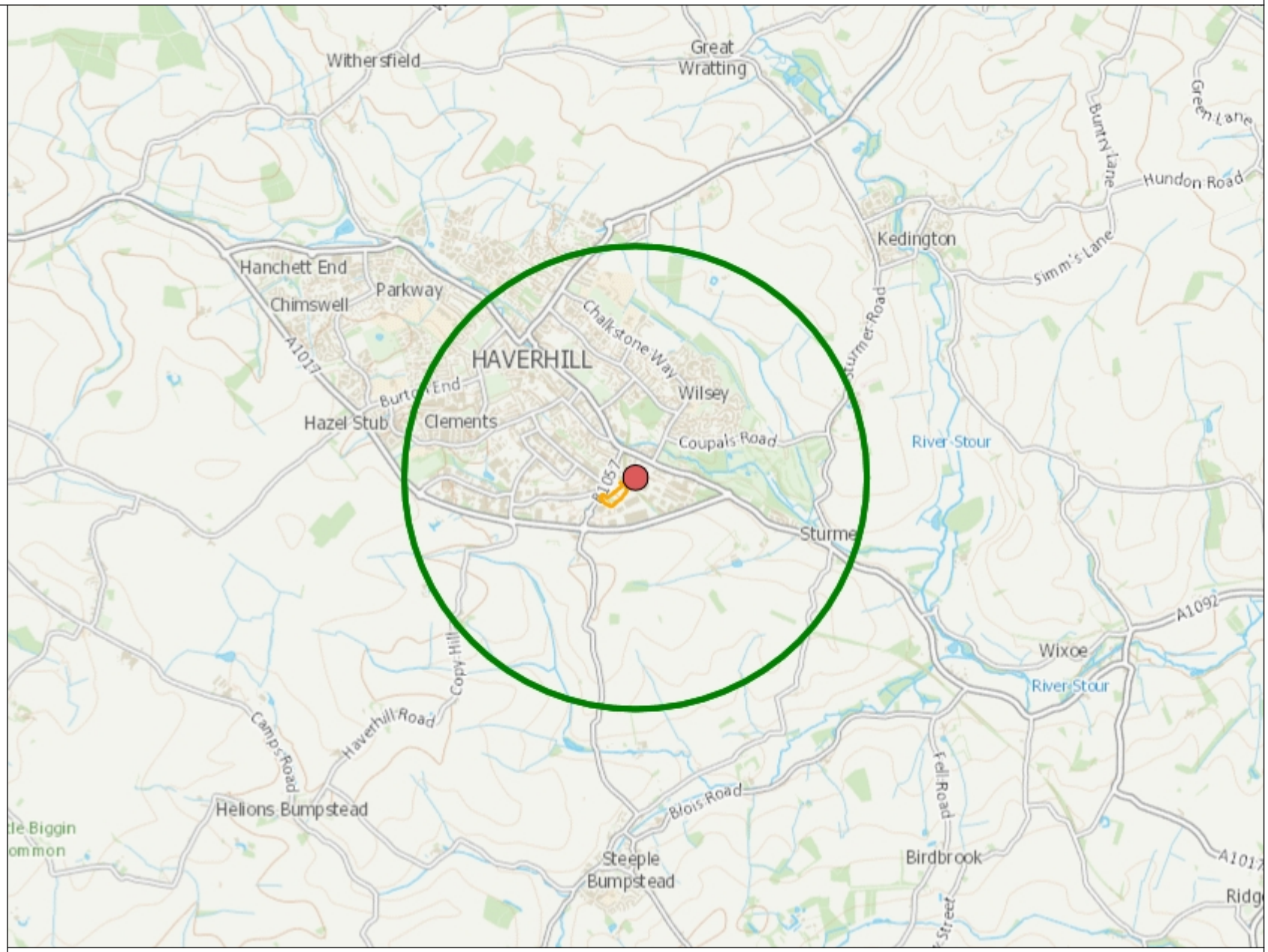
Appendix 1 – Local Wildlife Site Map

Local Wildlife Sites

Environment Agency

Legend

Local Wildlife Sites



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