



Environmental Risk Assessment

Environmental Permit Application – Little Cliffsend Farm

October 2023

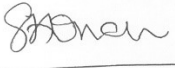
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This document has been prepared and checked in accordance with
Waterman Group's IMS (BS EN ISO 9001: 2015, BS EN ISO 14001: 2015 and BS EN ISO 45001:2018)

Issue	Date	Prepared by	Checked by	Approved by
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Comments

Comments

Disclaimer

This report has been prepared by Waterman Infrastructure & Environment Limited, with all reasonable skill, care and diligence within the terms of the Contract with the client, incorporation of our General Terms and Condition of Business and taking account of the resources devoted to us by agreement with the client.

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- A. Plans and Drawings
- B. Generic Risk Assessment
- C. EA Nature and Heritage Conservation Screening

1. Introduction

1.1 The Brief

Waterman Infrastructure & Environment Limited (“Waterman”) is instructed by Thanet Grab Hire Limited (TGH) to prepare an Environmental Permit (EP) application to the Environment Agency (EA). The application seeks a bespoke EP based on the SR2008No11_75kte – Inert and excavation waste transfer station with treatment rule set, to authorise waste management activities at Little Cliffsend Farm, Chalk Hill, Cliffsend, Ramsgate CT12 5HP.

A bespoke EP application requires an Environmental Risk Assessment (ERA) to be submitted as part of the application which analyses the potential environmental risks that the waste activities carry.

1.2 Report Context and Structure

An ERA is required in circumstances where there is no suitable standard rules EP available for the proposed activities, or where there is a near fit standard rules EP where the proposals do not meet all the criteria. In such cases only those aspects lying beyond the scope of the standard rules require assessment.

A standard rules EP application for this site is not viable because of a number of ecological designations recorded over the coastal environment to the south of the site. These designations will be elaborated on in section 3 below. Henceforth, the area containing these designations will be collectively referred to as the Sandwich Bay ecologically important site.

The activities and infrastructure proposed for the facility are as permitted by the SR2008No11_75kte.

The deviations of the proposed bespoke EP from SR2008No11_75kte ruleset are subject to assessment in accordance with EA guidance¹.

The findings of the risk assessment shall be used to inform management and mitigation measures as described herein and incorporated into the operator’s Environmental Management System (EMS).

A Dust & Emissions Management Plan (DEMP) has also been submitted with the EP application. The dust and particulates risk assessment is presented in the DEMP rather than in this ERA, along with detailed dust prevention and mitigation measures.

A Noise Impact Assessment (NIA) and a Noise Management Plan (NMP) have also been submitted with the EP application. Noise is therefore not considered in this ERA.

1.3 Limitations and Constraints

This report has been prepared in accordance with the scope agreed between Waterman and TGH, as documented in Waterman’s fee letter (WIE19228-100-220422-SO-Fee dated 22 April 2022) and with Waterman’s standard Terms of Appointment.

The benefit of this report is made to TGH.

Waterman has endeavoured to assess all information provided to them during this investigation, but makes no guarantees or warranties as to the accuracy or completeness of this information. The conclusions resulting from this study are not necessarily indicative of future conditions or operating practices at or adjacent to the site.

The scope of this investigation does not include an assessment for the presence of asbestos containing

¹ Guidance available at [Risk assessments for your environmental permit - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/risk-assessments-for-your-environmental-permit) (accessed February 2023).

materials within or below buildings or in the ground at the facility.

2. The Site and Activities

2.1 Site Location

The site is centred at approximate National Grid Reference TR 3577 6448.

It is located in the northeast part of the Little Cliffsend Farm.

The site comprises a yard of approximately 0.15 hectare (ha) in area.

Access to the site is from Chalk Hill Road by a single private road at the northwest corner of Little Cliffsend Farm.

A plan showing the site's EP boundary can be found in Appendix A.

2.2 Site Environs

The surroundings of Little Cliffsend Farm are predominately agricultural.

To the north of the site is arable land that stretches to up to the A299 and the residential periphery of Ramsgate.

The east of the site are horse paddocks, used for animal husbandry, that extend up to Pegwell Road and Ramsgate.

The south is occupied by three residential properties and a stables which are part of the Little Cliffsend Farm development. Further, at the cliffs edge and beyond lies Sandwich Bay which has national and international ecological designations discussed below.

The west features commercial and industrial businesses, as well as a reservoir. Beyond the western boundary of Little Cliffsend Farm is arable land that extends until Sandwich Road and the residences of Cliffsend village.

The nearest population centres are Ramsgate (570m east) and Cliffsend (380m west).

The table found below summaries in brief the surrounding environment and land uses found there.

Table 1: Summary of surrounding land uses

Location	Description
North	Agricultural
East	Animal husbandry, residential
South	Animal husbandry, residential, England Coastal Path route, Sandwich Bay ecologically important site
West	Commercial industrial / non-residential, reservoir, agricultural, and residential

A plan showing the sensitive receptors that may be negatively impacted by the waste activity applied for, within a 500m radius is included in Appendix A.

2.3 Proposed Waste Management Activities

2.3.1 SR2008No11_75kte

The site proposes to work under a bespoke EP based the SR2008No11_75kte EP, in order to generate value as a recycled aggregate production operation.

All waste activities, including processing and storage, will take place in the open yard. The permitted area is underlain entirely by permeable surfacing.

The facility seeks to conduct the following activities on the site:

- storage of inert and excavation waste pending recycling or reclamation;
- the recycling or reclamation of organic² and inorganic materials;
- treatment of wastes by;
 - sorting;
 - separation;
 - screening; and
 - crushing.

The generation of recycled aggregate from inert waste feedstock will be conducted in line with the appropriate quality protocol³, in order to meet the requirements of end of waste. The produced recycled aggregates, no longer being wastes, become viable products that are then transported off the site for sale.

The site proposes to work between the hours of:

- 07:30 to 16:30 on weekdays; and
- 08:00 to 13:00 on Saturdays.

TGH proposes to use a crusher on a campaign basis, and will restrict its operation to the hours of:

- 09:00 to 16:00 on weekdays only.

The same restricted hours will apply to the more frequent operation of a screener. Further detail regarding related control measures are included in the NMP, which can be found elsewhere in the application bundle.

² Under the limitation that organic substances are not used as solvents.

³ End of Waste Criteria for the production of aggregates from inert waste, accessible from [Quality protocol: aggregates from inert waste - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/674222/Quality_protocol_aggregates_from_inert_waste_-_GOV.UK.pdf) (accessed February 2023)

3. Comparison of Variation Proposals with Environmental Permit – SR2008No11_75kte

The SR2008No11_75kte ruleset has been reviewed in order to identify the differences between the standard rules and the activities proposed at the facility.

Rule 2 – operations

Three differences have been identified.

The first difference noted is of condition 2.2.2:

- “*The activities shall not be carried out within:*
 - (a) 500 metres of a European Site or Site of Special Scientific Interest (SSSI)…”

The facility is within 500m of the Sandwich Bay ecologically important site that has the following relevant statutory designations:

- Conserved wetlands sites (Ramsar sites);
 - Thanet Coast and Sandwich Bay;
- Sites of Special Scientific Interest (SSSI);
 - Sandwich Bay to Hacklinge Marshes;
- Special Areas of Conservation (SAC);
 - Thanet Coast;
 - Sandwich Bay;
- Special Protection Areas (SPA);
 - Thanet Coast & Sandwich Bay.

The other differences relate to Table 2.2. Waste types and quantities. The applicant wishes to accept an additional European Waste Catalogue (EWC) code, specifically 17 09 04, and reduce the maximum waste quantity listed to 50,000 tonnes per year.

No further deviations from the standard rules EP are identified or proposed.

For clarity and the avoidance of doubt, no variations from the standard rules EP are proposed for the following sections of the SR2008No11_75kte EP:

- 1 – Management;
- 3 – Emissions and monitoring; and
- 4 – Information.

3.1 Wastes to be Accepted

The table below includes all wastes proposed for acceptance, with those that are additional to those permitted by SR2008No11_75kte shown italicised. Due to the quite general nature of some of the EWC code entries, the additional waste type is also proposed by the operator to be subject to limitations as stated in the third column of the table below. An assessment of risks posed by this additional waste type is presented below.

Table 2: Wastes to be accepted at the site

EWC	Description	Proposed Limitation for waste types additional to those permitted by standard rules SR2008No11_75kte (shown in italics)
17 01	Concrete, bricks, tiles and ceramics	
17 01 01	Concrete	
17 01 02	Bricks	
17 01 03	Tiles and ceramics	
17 01 07	Mixtures of concrete, bricks, tiles and ceramic other than those mentioned in 17 01 06	
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 other than those mentioned in 17 05 07	
17 05 08	Track ballast other than those mentioned in 17 05 07	
17 09	Other construction and demolition wastes	
17 09 04	Mixed construction and demolition wastes including other than those mentioned in 17 09 01, 17 09 02 and 17 09 03	<p><i>Limited to excavation waste arising from the activities of utilities contractors, ground works contractors and others involved in the excavation of roads, car parks, foundations etc. (i.e. mixtures of tarmac, concrete, sub-base, soils etc.). Accordingly will comprise mixed construction and demolition wastes (including only 17 01 01, 17 01 02, 17 01 03, 17 01 07, 17 03 02, and 17 05 04).</i></p> <p><i>No mixed skip waste to be accepted.</i></p>
20 02	Garden and park wastes (including cemetery wastes)	
20 02 02	Soil and stones	

3.2 Maximum Quantities of Waste

The SR2008No11_75kte EP allows for a maximum quantity of 75,000 tonnes per year to be accepted at a site. The proposed bespoke EP intends to limit the quantity to 50,000 tonnes per year – this is a significant reduction. By reducing the total quantity of waste accepted at the site the risks inherent to the

operation will also be reduced.

4. Limits of the Assessment

This assessment is limited to consideration of those aspects lying outside of scope of standard rules for SR2008No11_75kte namely:

- additional waste type to be accepted; and
- risks to the Sandwich Bay ecological site that is within 500m of the site.

5. Assessment of Risks Posed by Additional Waste Type

5.1 Comparison of Additional Waste Type With Those Permitted by SR2008No11_75kte

5.1.1 17 09 04 mixed construction and demolition wastes other than those mentioned in 17 09 01, 17 09 02 and 17 09 03

The waste to be accepted will be limited to excavation waste arising from the activities of utilities contractors and other similar waste arising from the excavation of roads, car parks, foundations or similar infrastructure (i.e. activities generating waste arisings which include mixtures of asphalt, concrete, sub-base, soils etc.). The waste will comprise various constituents in variable proportions of asphalt, broken concrete, road base and sub soils which are acceptable under SR2008No11_75kte as separated wastes from sub chapter 17 01 concrete, bricks, tiles and ceramics, 17 03 02 non-hazardous bituminous mixtures and 17 05 04 non-hazardous soil and stones.

Whilst there is the potential for minor proportions of plastic and metals (e.g. pipe work, ducting etc.) to be present in the waste, such contraries are also considered likely to be present in the single waste type streams permitted by SR2008No11_75kte. Accordingly we consider the additional waste type is not materially different from those permitted under standard rules since it offers no greater intrinsic hazard nor warrants the application of any additional control measure over and above those required under standard rules. This waste type does carry a marginally increased risk of littering due to potential inclusions. This risk will be addressed and mitigated by procedures in the site's EMS, and therefore excluded from the risk assessment table that follows.

For the avoidance of doubt, we confirm that no mixed skip waste is proposed for acceptance at the site.

6. Assessment of Risks Posed by Site Location

6.1 Introduction

This assessment makes use of the source-pathway-receptor model to investigate the magnitude of risk and potential linkages between pollution and sensitive receptors. The Sandwich Bay ecologically important site is agreed to be present as a receptor within 500m, however there are also residential sensitive receptors within 50m that should be considered as well in the context of noise impacts.

The GRA for the SR2008No11_75kte EP has been used as a basis for a review of the potential risks to the Sandwich Bay ecologically important site. The assessment has been included in a later section. The environmental risks posed by the site in all other respects has been covered by the GRA for SR2008No11_75kte which may be found in Appendix B.

6.2 Sandwich Bay Ecologically Important Site

An EA Nature and Heritage Conservation screen report identified multiple statutory conservation designations, within 500m of the site.

The largest of these designated areas is the Sandwich Bay to Hacklinge Marshes SSSI, which encompasses an area of approximately 1790ha along the coastal region between Deal and Sandwich⁴. The area is of conservation interest because it contains many nationally rare plant and invertebrate species, and is an important site for wintering bird populations⁵. The latter point is of relevance to this report as the bird species may be affected by the noise generated at the site.

The report and enclosed maps are included in Appendix B.

6.3 Review of Generic Risk Assessment for SR2008No11_75kte

6.3.1 Risk Assessment Approach

Activities, processes and wastes accepted that are associated with SR2008No11_75kte that have been identified as potential sources of harm to nature conservation sites can be seen in its respective GRA. The GRA collates all risks to protected areas into a single row and categorises the waste activity as carrying a medium magnitude of risk to SSSI at distances over 500m from a permitted facility.

To assess risks specifically to the Sandwich Bay and Hacklinge Marshes that is the concern of this report, a further risk assessment must be produced in the same vein as the SR2008No11_75kte GRA.

6.3.2 Risk Management Approach

In fields where it has been identified that there is a magnitude of risk above low, procedures for managing the corresponding risk will be set out in the "comments and risk management" column.

⁴ Information accessible from [SSSI detail \(naturalengland.org.uk\)](https://www.naturalengland.org.uk) (accessed February 2023).

⁵ Information accessible from [1001128 \(naturalengland.org.uk\)](https://www.naturalengland.org.uk) (accessed February 2023).

Table 3: Review of Generic Risk Assessment (GRA) for SR2008No11: location of the site within 500m of the Sandwich Bay ecologically important site

GRA Source and Potential Harm	GRA Magnitude of Risk to protected areas	GRA Risk Management	Comments and Risk Management	Residual Risk
Releases of dusts and bioaerosols (smothering of flora / change in soil pH / nutrient enrichment / toxic contamination)	Medium	Emissions management plan (EMP) (if required)	Please see DEMP included in the application bundle.	Low
Litter (harm to animal health by ingestion or entrapment, smothering of flora and loss of amenity value of the protected area)	Medium	EMP (if required)	The permitted waste types have low litter potential. The wind speed and direction data discussed above are also relevant to this potential linkage being mitigated. An EMP is not proposed, the management of litter will be addressed in the sites EMS.	Low
Debris and mud on local road (amenity and safety impacts)	Medium	EMP (if required)	This risk is not applicable to the Sandwich Bay ecologically important site, there are no roads through it. Access roads leading away from the site out to public highway will be washed by a road sweeper. Risk is addressed more generally in DEMP.	Low
Odour (loss of amenity value of the protected area, nuisance)	Medium	Odour management plan (if required)	Risk is not applicable to protected area, wastes have low odour potential. No odour management plan proposed.	Low

GRA Source and Potential Harm	GRA Magnitude of Risk to protected areas	GRA Risk Management	Comments and Risk Management	Residual Risk
Noise and vibration (disturbance of sensitive fauna and nuisance to local population)	Medium	NMP (if required)	<p>Fauna living in the Sandwich Bay ecologically important site may be impacted by noise and vibrations. The activity may impact the behaviour of birds that forage in the bay during low tide. The Sandwich Bay ecologically important site is 145m away from the site. However, there is a significant difference in elevation, the Sandwich Bay ecologically important site begins at a sheer cliff approximately 18m lower than the site. This will not only increase the effective distance of the site but also aid in the dispersion of the noise generated by the waste activity.</p> <p>A Noise Impact Assessment (NIA) has been prepared and is included in the application bundle. It is focussed on residential receptors within 100m of the site and does not find noise risk to the residents to be unacceptable. It can be concluded the fauna living in the Sandwich Bay ecologically important site will also not be unacceptably impacted.</p> <p>A NMP has also been prepared and is included in the application bundle.</p>	Low
Scavenging animals and birds and pests e.g. flies (predation of sensitive fauna and flora)	Medium	EMP (if required)	<p>The wastes accepted by the facility are not likely to attract or support a population of scavenging animals, birds or insect pests. The site may provide harbourage. An EMP is not proposed, the prevention of pests will be addressed in the site's EMS.</p>	Low
Flooding of site (contamination of surrounding downstream with wastes)	Medium	Accident procedures and contingency plans and EMS	<p>The site is not at risk from river or coastal flooding. Surface water flooding is anticipated to be negligible. There is a moderate risk of groundwater flooding.</p> <p>The site is comprised of permeable surfacing which further reduces flood risk. Permitted wastes are inert and are not likely to reach the Sandwich Bay ecologically important site in the event of flooding.</p>	Low

GRA Source and Potential Harm	GRA Magnitude of Risk to protected areas	GRA Risk Management	Comments and Risk Management	Residual Risk
Site hazards such as machinery and wastes (bodily injury by plant and equipment to unauthorised human and livestock visitors)	N/A	N/A	Diesel and other chemicals used in machine maintenance are not stored on site. This risk is not relevant to the Sandwich Bay ecologically important site.	N/A
Arson / vandalism leading to polluting releases (all environmental media including controlled waters)	Medium	Accident procedures and contingency plans and EMS	<p>The accepted wastes are not predisposed to be being flammable or combustible, however plant and equipment used at the facility will be vulnerable to tampering and damage by vandalism that could lead to an incident e.g. diesel spill or fire.</p> <p>In the event of a vandalism incident, risks to the Sandwich Bay ecologically important site via groundwater and surface water pathways are minimal – groundwater is anticipated to flow northwest. which means there is no flow pathway.</p> <p>Vandalism can potentially lead to fires which can cause emissions to air, that may result in a deleterious impact on the Sandwich Bay ecologically important site.</p> <p>Airborne pollutants are less likely to be blown over the Sandwich Bay ecologically important site due to the prevailing wind direction. Fires on mobile plant or equipment are likely to be short in duration and infrequent.</p> <p>To specifically mitigate unauthorised access and in turn vandalism, the site will have site security procedures in place as part of its EMS.</p>	Low
Direct runoff with suspended solids,	Medium	Accident procedures and contingency plans and	See flooding. Direct runoff risk to the Sandwich Bay ecologically important site is very low due	Low

GRA Source and Potential Harm	GRA Magnitude of Risk to protected areas	GRA Risk Management	Comments and Risk Management	Residual Risk
spillages of liquids leading to acute effect on surface water quality and on downstream abstractions		EMS	to distance and intervening structures. Accident procedures and contingency plans will mitigate the risk to surface water quality in a general sense, as an example risk posed by diesel spills.	
Indirect runoff via soil layer with suspended solids, spillages of liquids leading to chronic effects on surface water quality and on downstream abstractions	Medium	Accident procedures and contingency plans and EMS	indirect runoff risk to the Sandwich Bay ecologically important site is very low due to distance and intervening soil structure. Accident procedures and contingency plans will mitigate the risk to surface water quality in a general sense, as an example risk posed by diesel spills.	Low
Contaminated surface water leading to chronic groundwater contamination requiring treatment of water or closure of borehole	Medium	Accident procedures and contingency plans and EMS	Potential for groundwater contamination is low because accepted waste types are non-hazardous or inert.	Low
Contaminated surface waters used for recreational purposes (harm to human health)	N/A	N/A	There is no pathway for contaminated surface water to reach the Sandwich Bay ecologically important site, and therefore no linkage.	N/A

6.4 Risk Management Actions Required

It is confirmed that the following will be implemented by TGH:

Dust & Emissions Management Plan

A plan for controlled potential dust and particulates produced using the EA's DEMP template⁶, will be utilised and incorporated into the site's EMS. The DEMP has been submitted as part of the EP application and can be found elsewhere in the application bundle.

The DEMP will account for environmental risks that may cause environmental harm or negatively impact amenity, by implanting control measures over aspects of the waste activity such as:

- mobile plant use; and
- waste storage and handling practices.

Noise Management Plan

A plan for controlling potential noise emissions produced using the EA's NMP template and guidance⁷, will be utilised and incorporated into the site's EMS. The NMP has been submitted as part of the EP application and can be found elsewhere in the application bundle.

The NMP will account for environmental risks that may cause environmental harm or negatively impact amenity, by implanting control measures over aspects of the waste activity such as:

- mobile plant use; and
- site operating times.

Accident Plan

Accident procedures and contingency plans will be incorporated into the EMS that will govern the site. These procedures and plans are designed to manage the environmental harm caused by potential incidents that may take place at the site.

Environmental Management System

The site will operate in accordance with an approved EMS developed using EA guidance⁸. The EMS will govern the operating practices of the site and will ensure compliance with the proposed bespoke EP.

⁶ Dust & Emission Management Plan (DEMP), version 10, released October 2018 (received by email from preapplicationservice@environment-agency.gov.uk, dated 6 May 2022)

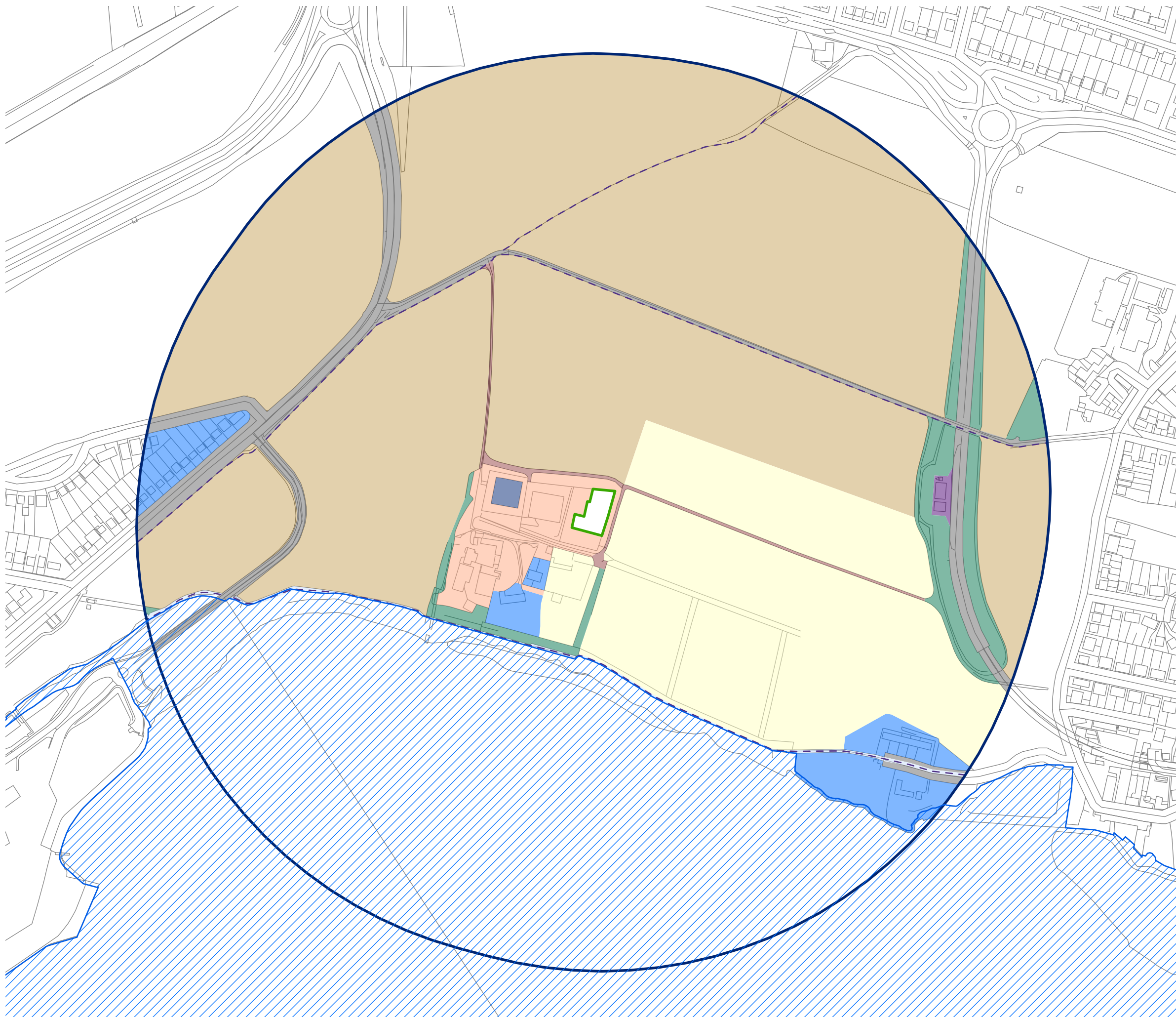
⁷ EA Noise Management Plan version 1.0, released on 2 November 2021 (received by email from preapplicationservice@environment-agency.gov.uk, dated 6 May 2022)



⁸ Accessible at [Develop a management system: environmental permits - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/develop-a-management-system-environmental-permits) (accessed February 2023)

APPENDICES

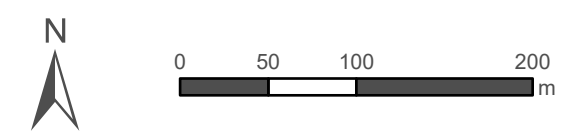
A. Plans and Drawings

- 500m Sensitive Receptors Plan (WIE19228-100_GIS_EPA_2A).



-  Permit Boundary
-  500m Study Area
-  Agricultural
-  Commercial Industrial / Non-residential
-  England Coast Path Route
-  Animal Husbandry
-  Private Access Road
-  Public Highways
-  Reservoir
-  Residential
-  Utilities
-  Woodland
-  Public Rights of Way
-  Conservation Statutory Designations*

* The designation boundaries have been combined in this plan for the sake of clarity. The designation boundaries are shown separately in the Environment Agency's Nature and Heritage Conservation Screening Report: Bespoke Waste (reference EPR/LB3037AU/A001) dated 6 May 2022."



Project Details	WIE19228-100: Thanet Grab Hire, Little Cliffsend Farm
Figure Title	Figure 2: Environmental Receptor Plan
Figure Ref	WIE19228-100_GIS_EPA_2A
Date	March 2023
File Location	N:\Projects\WIE19228\100\9_GIS\WIE19228-100_GIS_WAI

B. Generic Risk Assessment

- GRA for SR2008No11_75kte EP.

Generic risk assessment for standard rules set number SR2008No11 v4.0

Standard Facility:	Waste Operation: Inert and Excavation Waste Transfer Station with treatment
Location:	Applies to all potential locations.
Location of environmentally sensitive sites (km / m):	Greater than 50m (see below)
Risk assessment carried out by:	Environment Agency
Date:	25-Jun-12

The scope of the permit and associated rules is defined by the following risk criteria:

- Parameter 1 Permitted activities - The storage and repackaging of waste (D15, R13, D14) and treatment consisting only of manual sorting, separation, screening and crushing (D9, R3, R4, R5)
- Parameter 2 Permitted waste types - Inert and Excavation Waste
- Parameter 3 Quantity of waste accepted at the facility: <75,000 tonnes per annum
- Parameter 4 The activities shall not be carried out within an Air Quality Management Area (AQMA) designated for particulate matter in the form of PM10.
- Parameter 5 All waste shall be stored and treated on an impermeable surface with sealed drainage system or on hard standing.
- Parameter 6 The only point source discharges to controlled waters or groundwater, are surface water from the roofs of building and from areas of the facility not used for the storage or treatment of wastes.
- Parameter 7 The activities shall not be carried out within 500m of a European Site (candidate or Special Area of Conservation, proposed or Special Protection Area or Ramsar site) or a Site of Special Scientific Interest (SSSI) or within 50m of any well, spring, or borehole used for the supply of water for human consumption; This must include private water supply or within 250 m of presence of Great Crested Newt where it is linked to the breeding ponds of the newts by good habitat

Abbreviations: SR - Standard Rule

Data and information				Judgement				Action (by permitting)	
Receptor	Source	Harm	Pathway	Probability of exposure	Consequence	Magnitude of risk	Justification for magnitude	Risk management	Residual risk
What is at risk? What do I wish to protect?	What is the agent or process with potential to cause harm?	What are the harmful consequences if things go wrong?	How might the receptor come into contact with the source?	How likely is this contact?	How severe will the consequences be if this occurs?	What is the overall magnitude of the risk?	On what did I base my judgement?	How can I best manage the risk to reduce the magnitude?	What is the magnitude of the risk after management? (This residual risk will be controlled by Compliance Assessment).
Local human population	Releases of particulate matter (dusts) and micro-organisms (bioaerosols).	Harm to human health - respiratory irritation and illness.	Air transport then inhalation.	High	Medium	High	Permitted waste types are inert and do not include dusts, powders or loose fibres and have a low potential to produce bioaerosols, but the treatment activities will produce particulate matter so a high magnitude risk is estimated. There is potential for exposure if anyone is living or working close to the site (apart from the operator and employees). There is potential for increased dust generation from permitted activities during prolonged dry periods e.g. summer months.	SR - emissions of substances not controlled by emission limits... SR (if required) emissions management plan. Long term increases in particulate levels are restricted by SR - the activities shall not be carried out within an AQMA designated for PM10.	Low
Local human population	As above	Nuisance - dust on cars, clothing etc.	Air transport then deposition	High	Low	Medium	As above. Local residents often sensitive to dust.	As above	Low
Local human population, livestock and wildlife.	Litter	Nuisance, loss of amenity and harm to animal health	Air transport then deposition	Low	Low	Low	Local residents often sensitive to litter, however permitted waste types have low litter potential.	As above. Appropriate measures could include clearing litter arising from the activities from affected areas outside the site.	Very low
Local human population	Waste, litter and mud on local roads	Nuisance, loss of amenity, road traffic accidents.	Vehicles entering and leaving site.	Medium	Medium	Medium	Road safety, local residents often sensitive to mud on roads.	As above. Appropriate measures could include clearing waste, litter and mud arising from the activities from affected areas outside the site.	Low

Local human population	Odour	Nuisance, loss of amenity	Air transport then inhalation.	Low	Low	Low	Local residents often sensitive to odour, however permitted waste types have low odour potential.	SR - emissions shall be free from odour.... SR (if required) - odour management plan.	Very low
Local human population	Noise and vibration	Nuisance, loss of amenity, loss of sleep.	Noise through the air and vibration through the ground.	Medium	Medium	Medium	Local residents often sensitive to noise and vibration	SR - emissions shall be free from noise and vibration..... SR (if required) - noise and vibration management plan.	Low
Local human population	Scavenging animals and scavenging birds	Harm to human health - from waste carried off site and faeces. Nuisance and loss of amenity.	Air transport and over land	Low	Medium	Low	Permitted wastes unlikely to attract scavenging animals and birds but may become nesting / breeding sites.	SR - emissions of substances not controlled by emission limits (including those from scavenging animals, scavenging birds and other pests) shall not cause pollution.	Very low
Local human population	Pests (e.g. flies)	Harm to human health, nuisance, loss of amenity	Air transport and over land	Low	Medium	Low	Permitted waste types unlikely to attract pests.	As above	Very low
Local human population and local environment	Flooding of site	If waste is washed off site it may contaminate buildings / gardens / natural habitats downstream.	Flood waters	Low	Low	Low	Permitted waste types are inert so any waste washed off site will add to the volume of the local post-flood clean up workload, rather than the hazard.	SR - management system (will include flood risk management).	Very low
Local human population and / or livestock after gaining unauthorised access to the waste operation	All on-site hazards: wastes; machinery and vehicles.	Bodily injury	Direct physical contact	Medium	Low	Low	Permitted waste types are inert so any waste a low magnitude risk is estimated	SR - activities shall be managed and operated in accordance with a management system (will include site security measures to prevent unauthorised access).	Low
Local human population and local environment.	Arson and / or vandalism causing the release of polluting materials to air (smoke or fumes), water or land.	Respiratory irritation, illness and nuisance to local population. Injury to staff, firefighters or arsonists/vandals. Pollution of water or land.	Air transport of smoke. Spillages and contaminated firewater by direct run-off from site and via surface water drains and ditches.	Medium	Low	Low	Permitted waste types do not include sludges or liquids and are inert, so only a low magnitude risk is estimated.	As above. SR - management system (will include fire and spillages).	Low
Local human population and local environment	Accidental fire causing the release of polluting materials to air (smoke or fumes), water or land.	Respiratory irritation, illness and nuisance to local population. Injury to staff or firefighters. Pollution of water or land.	As above.	Low	Low	Low	As above.	As above (excluding comments on access to waste). Permitted activities do not include the burning of waste.	Low
All surface waters close to and downstream of site.	Spillage of liquids, leachate from waste, contaminated rainwater run-off from waste e.g. containing suspended solids.	Acute effects: oxygen depletion, fish kill and algal blooms	Direct run-off from site across ground surface, via surface water drains, ditches etc.	Low	Low	Low	Permitted waste types do not include sludges or liquids so only a medium magnitude risk is estimated. There is potential for contaminated rainwater run-off from wastes stored outside buildings especially during heavy rain.	SR - All liquids shall be provided with secondary containment.... (applies to non- wastes such as fuels). Run-off restricted by SR on emissions of substances not controlled by emission limits , with appropriate measures: storage & treatment on an impermeable surface with sealed drainage or on hard standing.	Very low
All surface waters close to and downstream of site.	As above	Chronic effects: deterioration of water quality	As above. Indirect run-off via the soil layer	Low	Low	Low	Waste types are non-hazardous and inert so harm is likely to be temporary and reversible.	As above	Very low
Abstraction from watercourse downstream of facility (for agricultural or potable use).	As above	Acute effects, closure of abstraction intakes.	Direct run-off from site across ground surface, via surface water drains, ditches etc. then abstraction.	Low	Low	Low	Watercourse must have medium / high flow for abstraction to be permitted, which will dilute contaminated run-off.	As above	Very low
Groundwater	As above	Chronic effects: contamination of groundwater, requiring treatment of water or closure of borehole.	Transport through soil/groundwater then extraction at borehole.	Low	Low	Low	Permitted wastes unlikely to contaminate groundwater.	As above	Very low

Local human population	Contaminated waters used for recreational purposes	Harm to human health - skin damage or gastro-intestinal illness.	Direct contact or ingestion	Low	Medium	Low	Unlikely to occur, but might restrict recreational use.	SR - emissions of substances not controlled by emission limits...SR (if required) - emissions management plan.	Very low
Protected sites - European sites and SSSIs	Any	Harm to protected site through toxic contamination, nutrient enrichment, smothering, disturbance, predation etc.	Any	Medium	Medium	Medium	Waste operations may cause harm to and deterioration of nature conservation sites.	SR - emissions of substances not controlled by emission limits...SR - activities shall not be carried out within 500m of a European Site or SSSI; or within 50m of any well, spring, or borehole used for the supply of water for human consumption; or within 250 m of presence of Great Crested Newt where it is linked to the breeding ponds of the newts by good habitat. (Distance criteria as agreed with Natural England/Countryside Council for Wales).	Low

Notes: Red triangle indicates comment containing supporting information
 Yellow columns contain drop down menus that allow automatic evaluation of risk in green column

C. EA Nature and Heritage Conservation Screening

- Nature and Heritage Conservation Screening Report: Bespoke Waste (reference EPR/LB3037AU/A001) dated 6 May 2022.

Nature and Heritage Conservation

Screening Report: Bespoke Waste

Reference	EPR/LB3037AU/A001
NGR	TR 35635 64539
Buffer (m)	35
Date report produced	06/05/2022
Number of maps enclosed	6

The nature and heritage conservation sites and/or protected species and habitats identified in the table below must be considered in your application.

Nature and heritage conservation sites	Screening distance (m)	Further Information
Special Areas of Conservation (cSAC or SAC) Thanet Coast (SAC) Sandwich Bay (SAC)	1000	Joint Nature Conservation Committee
Special Protection Area (pSPA or SPA) Thanet Coast & Sandwich Bay (SPA)	1000	Joint Nature Conservation Committee
Ramsar Thanet Coast & Sandwich Bay (Ramsar)	1000	Joint Nature Conservation Committee
Sites of Special Scientific Interest (SSSI) Sandwich Bay to Hacklinge Marshes (SSSI)	1000	Natural England
National Nature Reserve (NNR) Sandwich & Pegwell Bay (NNR)	200	Natural England

Protected Species

European Eel migratory route
Atlantic Salmon migratory route
River Lamprey migratory route

Screening distance (m)

up to 500m

Further Information

[Natural England](#)

Environment Agency. Dial 03708 506 506 for your local Fisheries and Biodiversity team


Where protected species are present, a licence may be required from [Natural England](#) to handle the species or undertake the proposed works.

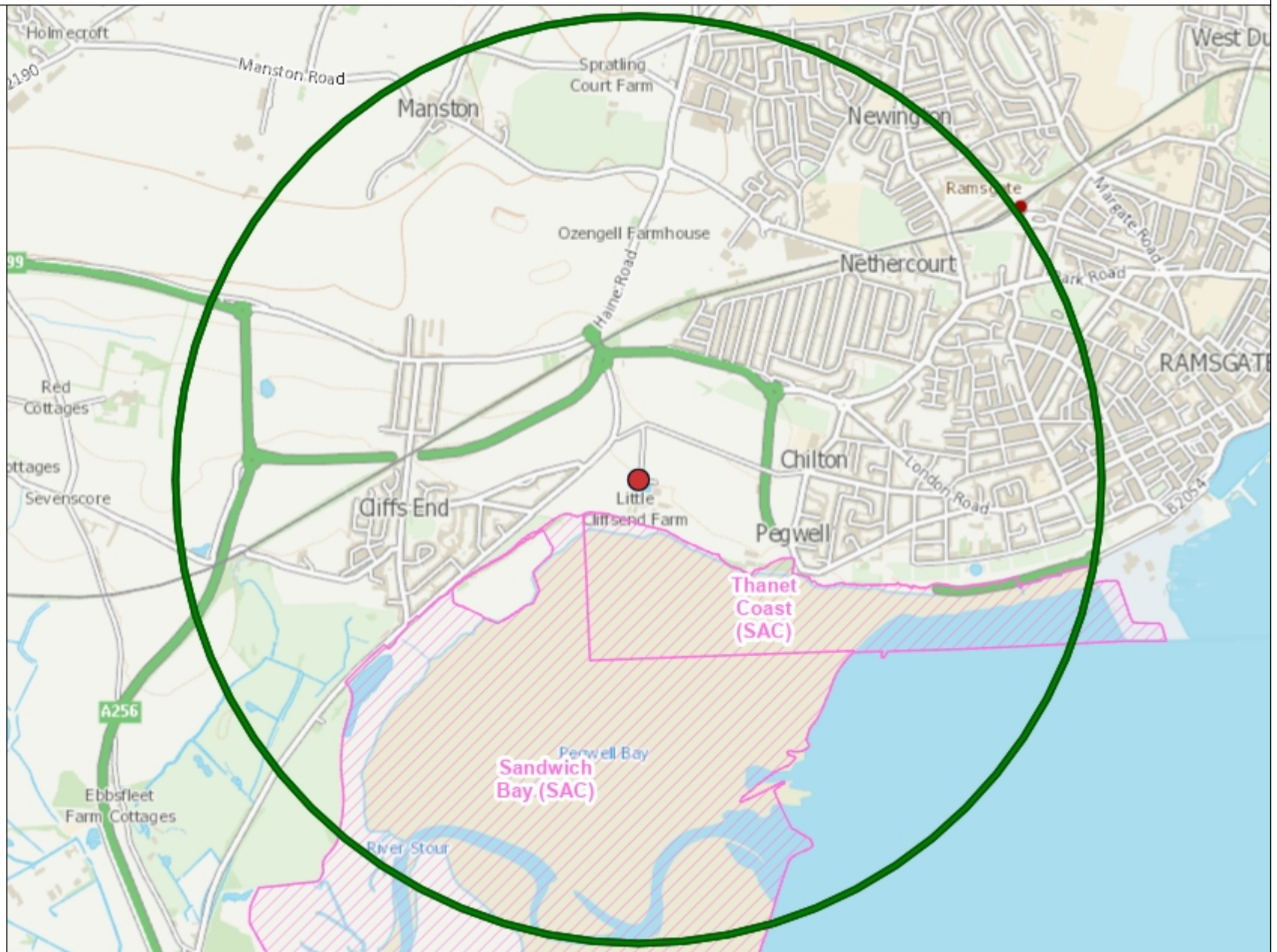
Please note we have screened this application for protected and priority sites, habitats and species for which we have information. It is however your responsibility to comply with all environmental and planning legislation, this information does not imply that no other checks or permissions will be required.

Please note the nature and heritage screening we have conducted as part of this report is subject to change as it is based on data we hold at the time it is generated. We cannot guarantee there will be no changes to our screening data between the date of this report and the submission of the permit application, which could result in the return of an application or requesting further information.

Special Areas of Conservation


Legend

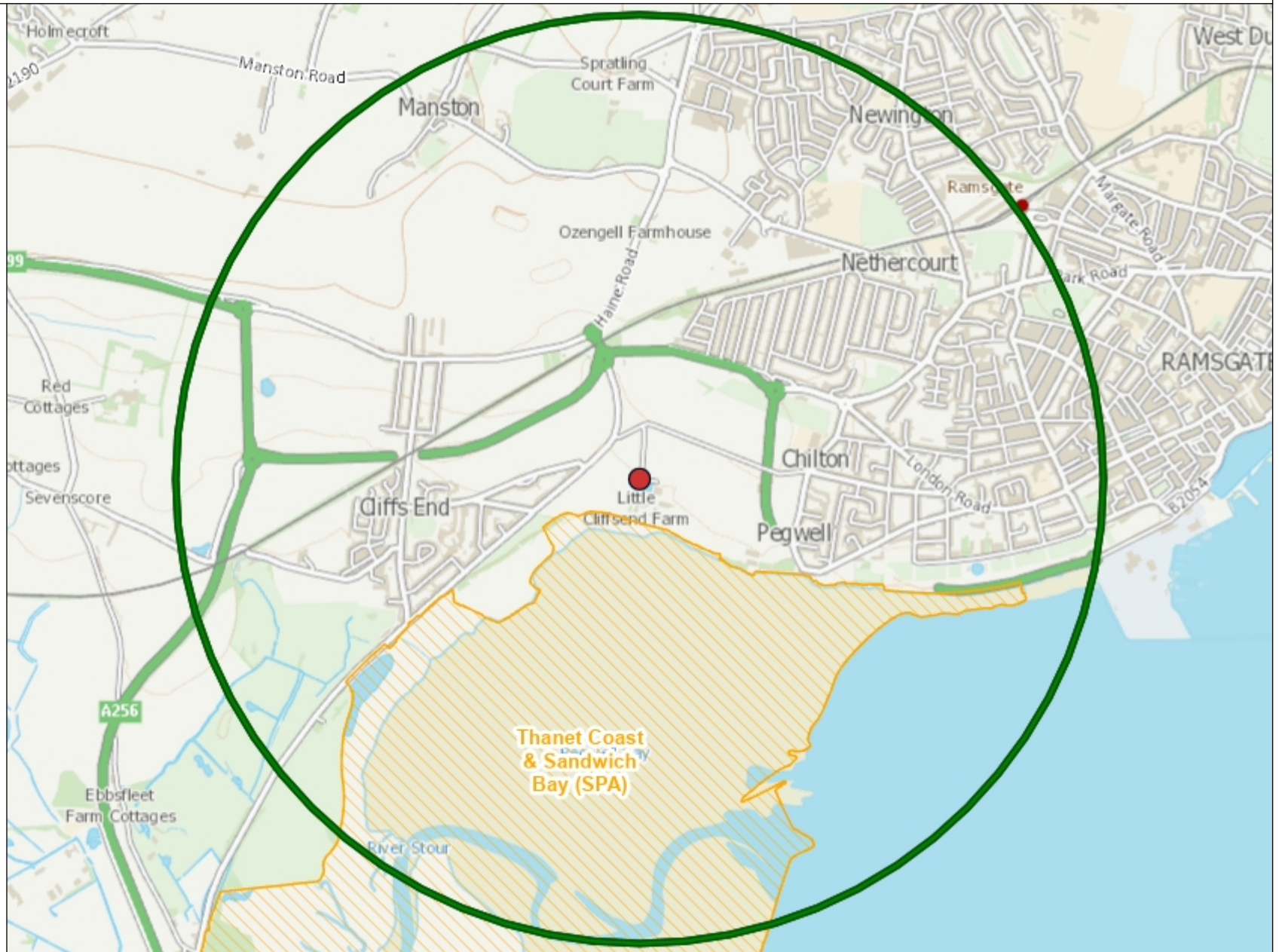
 SAC (England)



Special Protection Area

Legend

 SPA (England)



1: 25,000


0 625

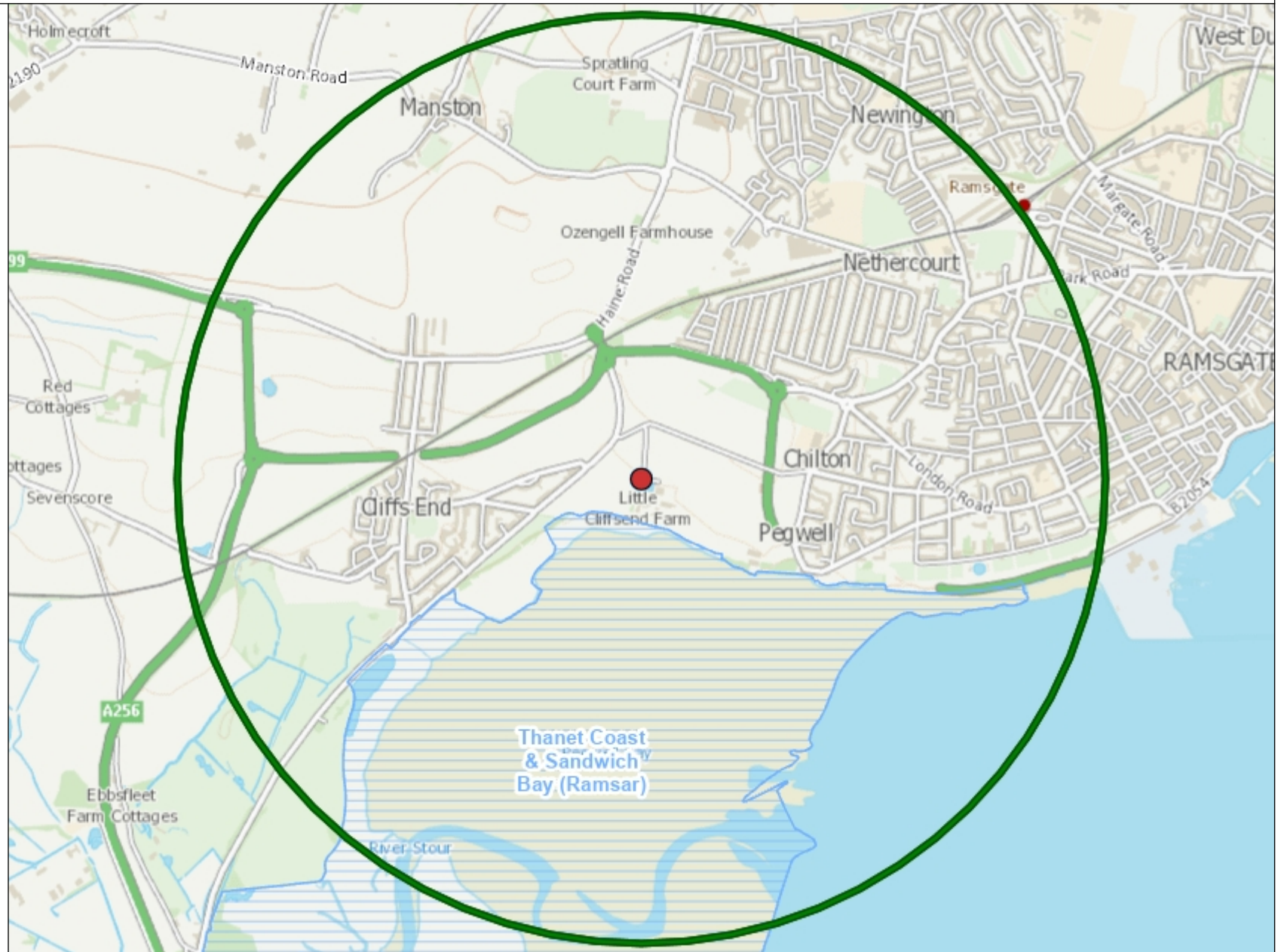
Metres



Ramsar

Legend

-  Ramsar (England)



1: 25,000


0 625

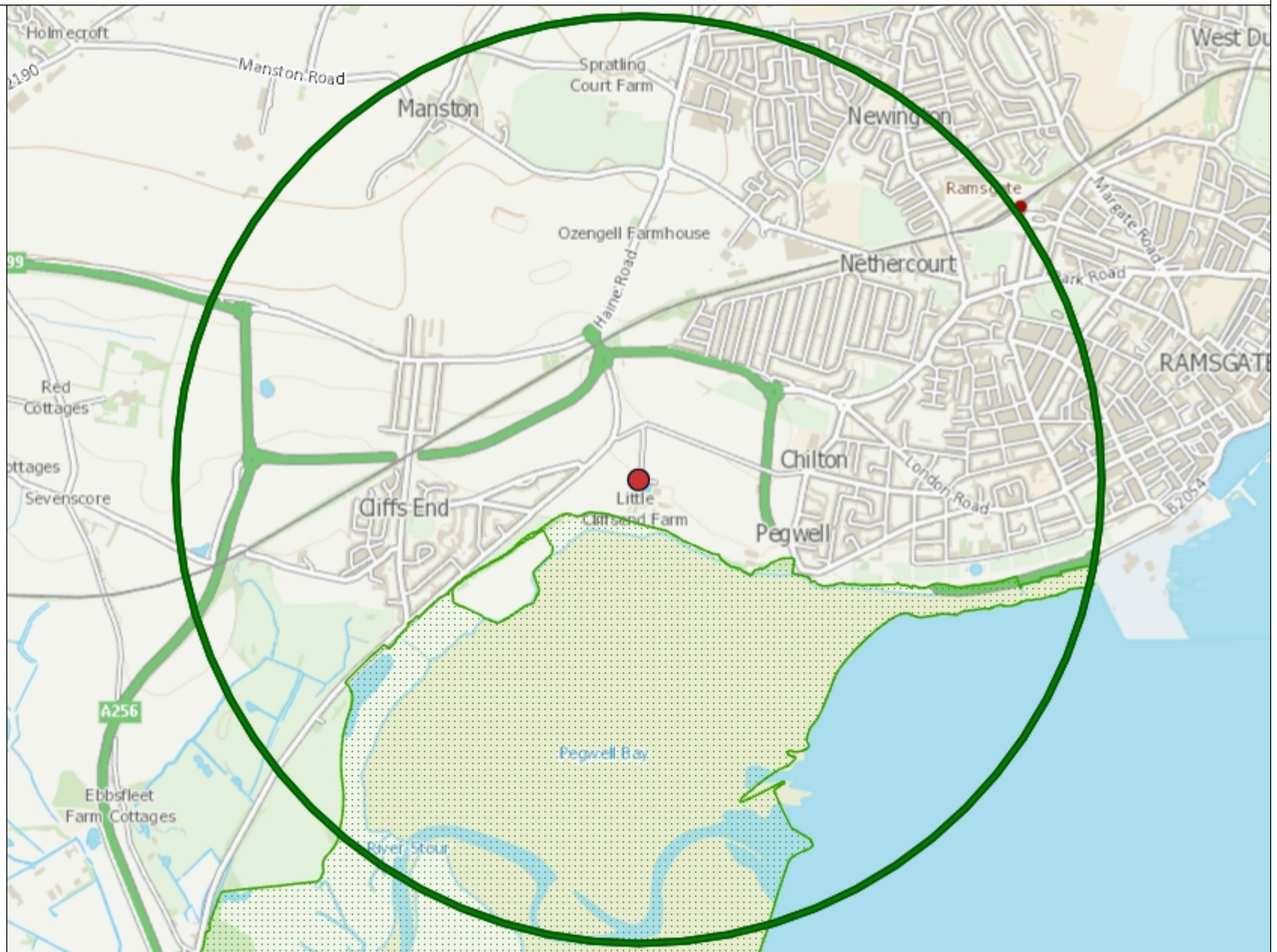
Metres



Site of Special Scientific Interest

Legend

 SSSI (England)



1: 25,000

0 625


Metres

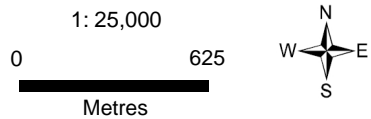
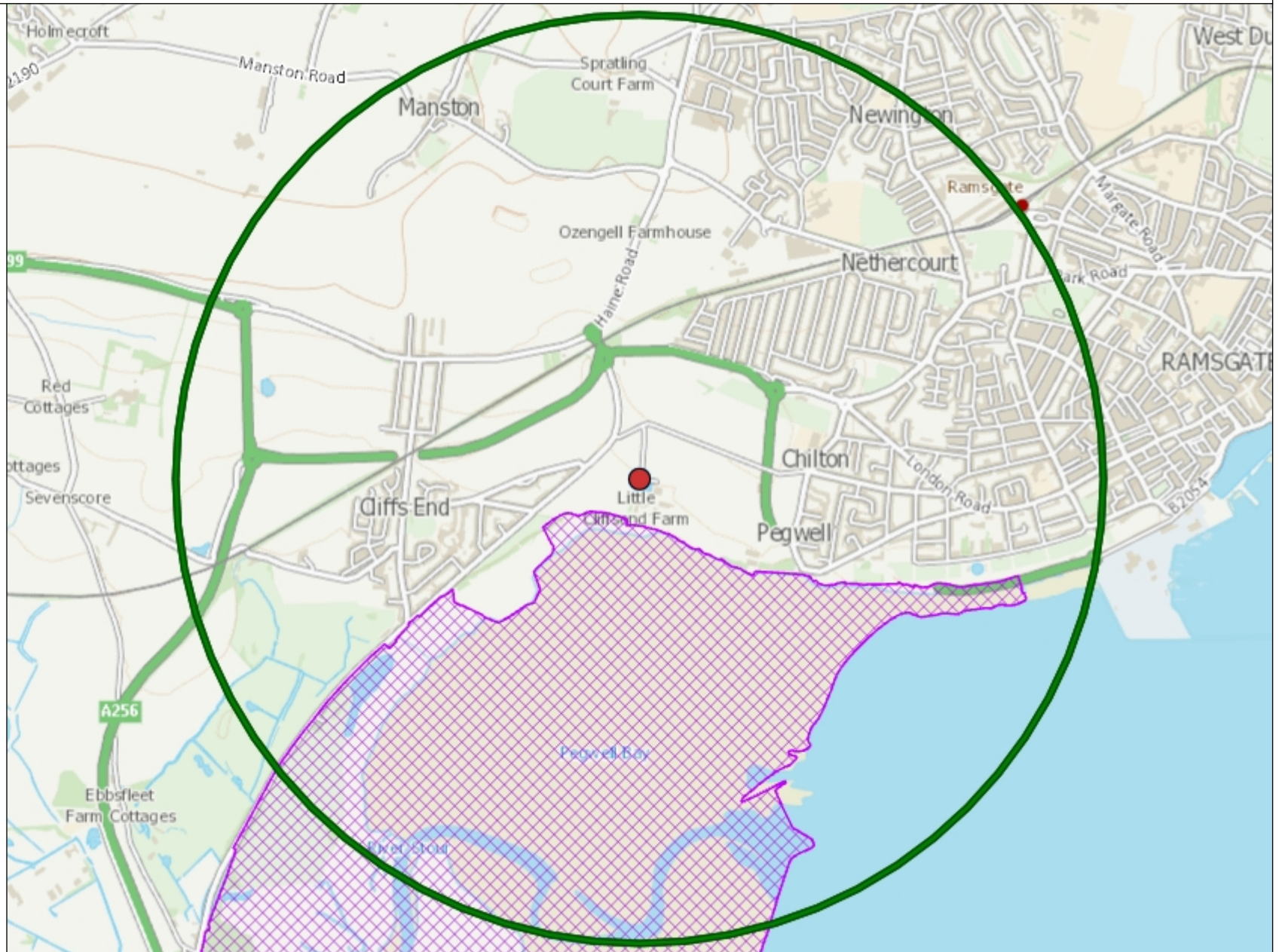


National Nature Reserve



Legend




 NNR (England)

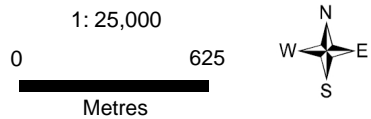
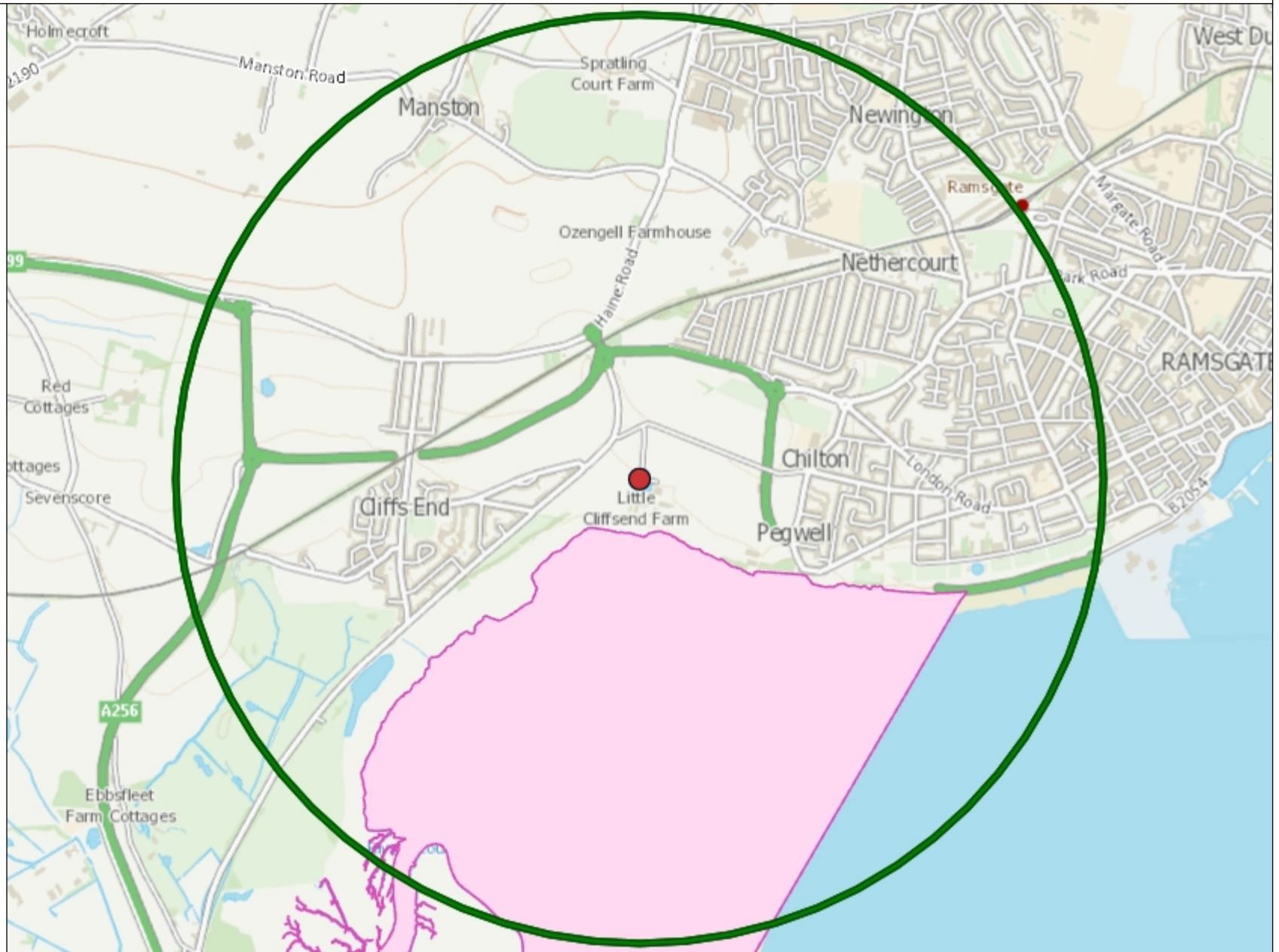


Protected Species

Legend

Protected species screened for Env Permits - complete set

-  Protected species, non fish
-  Protected fish
-  Protected fish migratory route



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We deliver progressive, sustainability-driven environmental and engineering consultancy services across every sector. We think differently, and we're harnessing our collective expertise to deliver greener, healthier and well-connected communities, networks and built environments.

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